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#### REFERENCES:

- (1) Wikipedia to ADR
- (2) Case Management and ADR LAW COMMISSION (for Banking sector)
- (3) Government of India regard to ADR Report No.222, April 2009.
- (4) Introduction to ADR [www.oup.com](http://www.oup.com).

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### DENIAL OF TRIBAL LAND JUSTICE

By

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A brief overview of the legislations affecting ownership and management of land in Schedule areas is essential to appreciate the pattern of growing problem or the continued struggle for tribal rights. It is important to have a critical assessment of the laws affecting land in agency areas in historical perspective demarcating the major concerns and issues.

#### *Historical Evolution of Land Laws in Fifth Scheduled Area*

##### *(a) Pre independence period:*

The land alienation as a pressing problem was first recognized during the British Rule in India when the Schedule Districts Act XIV, 1874 was passed aiming to protect the tribals from the danger of further land (legal land holding) alienation and indebtedness. Exercising the power under Section 6 of the Scheduled Districts Act, 1874, local Government issued rules for the administration of the Agency Tracts and for

regulation of the procedure of the Officers so appointed to administer them. Subsequently, the Agency Tracts Interest and Land Transfer Act 1917 (Act of 1917) came to be passed with the object of limiting the rate of interest and to check the transfer of lands in the Agency Tracts in Ganjam, Vizagapatnam and Godavari Districts. By a subsequent notification, the Act was extended to the taluk of Bhadrachalam in East Godavari District.

Under Section 2 of said Act, Agency Tracts are defined as meaning Scheduled Districts as defined in the Acts XIV and XV of 1874. Therefore, Scheduled Districts within the meaning of Scheduled Districts Act XIV of 1874 were treated as Agency Tracts by virtue of Section 2(a) of Act 1 of 1917. The object of Act 1 of 1917 is to limit the rate of interest and also to check the transfer of lands in the Agency Tracts. Yet, the land legislation was seldom implemented and prove effective.

In similar to the position of tribals in British presidency, the tribals in Telangana Districts of Nizam rule in the State of Hyderabad suffered at the hands of land grabbers, landlords, unscrupulous traders, and money lenders. Imposing heavy taxes on tribals and forcing them to retreat deep into the forest may be another reason<sup>1</sup>.

In comparatively recent times also in Adilabad District the tribals rebelled in 1940 under the leadership of Tribal Komram Bhim as a result of alienation of tribal land and forest reservation rules. The non-tribal settlers managed to obtain title deeds for the occupied lands which once belonged to tribals. Large chunk of lands which had been cultivated on Sivai Jamabandhi Tenure (Government Land Encroachments) was lying fallow at the time of demarcation was included in the Reserve.

The struggle was ultimately resulted to promulgation of law known as Tribal Areas Regulation 1356 Fasli (1946 A.D). This Regulation empowered the Government to make such rules as appear to them to be necessary or expedient for the better administration of any notified tribal area in respect of tribals and of their relation with non-tribals. The substance of this regulation was incorporated in the Tribal Areas Regulation 1359 Fasli (1949 A.D). The most important provision of this Regulation is no Court of law or revenue authority shall have any jurisdiction in any Notified Tribal Area in any dispute relating to land, house or house site occupied, claimed, rented or possessed by any tribal or from which any tribal may have been evicted whether by process of law or otherwise during a period of one year preceding the notification of such an areas as a Notified Tribal Area.

### ***(b) Post Independence period***

After the advent of the Constitution of India the provisions of the Fifth Schedule

to the Constitution were made applicable to the Scheduled areas of Andhra Pradesh. The Article 244 provides that for administration and control of the scheduled areas in any State. The Governor may make regulations for the peace and good Government after consulting the Tribes Advisory Council of the State if one is existing. He is also empowered to make regulations prohibiting or restricting transfer of land and by or among the members of the scheduled tribes in such area; regulate the allotment of land to members of the Scheduled Tribes in such area. Such regulation will have effect when the President has assented to the same.

Exercising the above power conferred by Para (5) of Fifth Schedule, the Governor issued the A.P Scheduled Area Land Transfer Regulation, 1959 (Regulation 1 of 1959) which came into force on 4.3.1959 partially repealing the earlier Agency Tracts Land Transfer Act 1917. The Tribal Area Regulation 1359 Fasli (1949 AD) in the Telangana Districts was repealed in 1963 and replaced by A.P. Scheduled Area Land Transfer Regulations 1 of 59 which came into force on 1.12.1963. The regulation says that notwithstanding anything contained in any enactment, rule or law in force in the Agency Tracts, any transfer of immovable property situated in the Agency Tracts by a member of a Scheduled Tribe, shall be absolutely *null* and *void* unless made"

- (i) in favour of any other member of a Scheduled Tribe or a registered society as defined in Clause (f) of Section 2 of the Madras Co-operative Societies Act, 1932 (Madras Act VL of 1932), composed solely of members of the Scheduled Tribes, or
- (ii) with the previous sanction of the State Government, or subject to rules made in this behalf, with the previous consent in writing of the Agent or of any prescribed officer.

1. Tribes of India-Haimendorf, 1943

Although the protective Land Transfer Regulations had been in force, it was observed by several committees that the non-tribals were able to find ways and means to circumvent the provisions of Land Transfer Regulation 1 of 1959 by entering into benami transactions and other clandestine transactions with unsophisticated tribals. As there was no check on transfer of lands between non tribal settlers and other non tribals, several transactions in relation to the immovable property situated in the scheduled areas were effected. As a result non tribal migration to scheduled areas had increased and invited further tribal land alienation by new migrants through recorded or un recorded clandestine transactions. The excessive exploitative conditions induced by external interventions, the ineffectiveness of the Government response in prevention Tribal land alienation and restoration of alienated tribal lands and the ineffective legislations triggered the Naxalite movement in Srikakulam Region from 1968-70.

It is only with a view to maintain peace

and to govern the area effectively Regulation 1 of 1970 was passed by the Governor. The basic purpose was to ensure that the land of the tribals should not be frittered away to outsiders by transfer and that non-tribals should not be allowed to infiltrate into scheduled areas by getting allotments of land made in their favor. The Regulations 1 of 70 say that until the contrary is proved, any immovable property situated in the Agency tracts and in the possession of a person who is not a member of Scheduled Tribe, shall be presumed to have been acquired by such person or his predecessor in possession through a transfer made to him by a member of a Scheduled Tribe.

#### *Out come of the Tribal Protective land laws:*

The out come of legal process at Special Deputy Collector's Court level in the State is a glaring example of denial of justice to tribals although tribal protective land transfer regulations 1 of 70 have been in force for retrieval of alienated lands.

**Table 3.2: Outcome of cases at Special Deputy Collector's Courts as on 31.1.2010**

Sl. No.	District	Cases detected		Cases Disposed		Cases Decided in favour of STs		Cases Decided in favour of Non-STs		Land Restored of Tribals		Balance cases at the end of the month (col. 3-5 & 4-6)	
1	2	Nos.	Extent (Acres)	Nos.	Extent (Acres)	Nos.	Extent (Acres)	Nos.	Extent (Acres)	Nos.	Extent (Acres)	Nos.	Extent (Acres)
3	4	5	6	7	8	9	10	11	12	13	14		
1.	Srikakulam	462	1100	453	1024	296	538	157	486	250	522	9	76
2.	Vizianagaram	1364	7544	1343	7501	955	5631	388	1870	850	5498	21	43
3.	Visakhapatnam	5708	22731	5480	22087	4359	17721	1121	4366	3029	13944	228	644
4.	East Godavari	8485	49637	8264	48768	3751	19667	4513	29101	3392	17685	221	869
5.	West Godavari	11611	62121	11477	60820	2584	11082	8893	49738	2451	10081	134	1301
6.	Khammam	33582	126713	33325	125834	15514	52192	17811	73642	12750	41662	257	879
7.	Warangal	7289	15784	7052	15218	4865	8964	2187	6254	4865	8964	237	566
8.	Adilabad	8245	54008	7564	51543	4175	27839	3389	23704	3305	23606	681	2465
9.	Mahbubnagar	16	61	15	57	13	49	2	8	13	49	1	4
Total		76762	339699	74973	332852	36512	143683	38461	189169	30905	122011	1789	6847

Out of 76762 cases covering an extent of 339699 Acres of land, 74973 cases covering an extent of 332852, were disposed off by the SDC Courts in the State of Andhra Pradesh. The Courts decided 36512 cases covering an extent of 143683 Acres of land in favor of tribals. However the enforcing machinery set up under the Regulations only could able restore the land of 122011 Acres pertaining to the 30905 cases out of 36512. On contrary the non tribals parties could able to secure orders in their favor in 38461 cases and retained the land of 189169 acres of in their possession.

The table shows that the success rate is 49 percent in the case of tribals, 51 percent in the case of non tribals. Tribals could able to regain the possession of lands from non tribals only to the extent of 43 percent of the total extent of land covered by cases disposed off, while the Non tribal could retain the remaining 57 percent of the disputed land. Due to failure of implementing machinery in implementing the orders passed by the SDC Court in favor of Tribals, only 85 percent of total cases disposed off in favor of tribals covering an extent of 85 percent of land was only handed physically to them. This shows the failure on the part of administrative machinery in execution of the orders passed by the Court in favor of tribals. This resulted in to continuation of non tribals in the lands even eviction orders were passed against them.

The legal system in Scheduled Areas is ostensibly designed to facilitate the passage of justice in tribal-dominated societies. In this cause, legal protections for tribals have been formulated in the interest of their survival and livelihood. But, as *K. Balagopal* has pointed out,

it is not enough if a disadvantaged class of people are endowed with legal rights. Legal instruments created for the benefit of the socially privileged can be expected to find their way to implementation

without anything else. This is not the case with legal rights enacted for the benefit of the disadvantaged<sup>2</sup>.

The alien legal system imposed by British impinges on the customary land rights of adivasis. Customary law traditionally settled tribal disputes until English common law became the sole legitimate recourse for enforcing rights. Predictably, the usual difficulties with any imposed law—prolonged procedures, impractical rules of evidence, and delays in disposal of cases—hinder a verdict even in the simplest of cases. But tribals give more value to the verbal evidence rather documentary. However Evidence Act gives more weightage to documentary evidence which is well known to the Non tribal parties in the land matters and managed to document the land records which are in their favor to get advantage during the Court enquiries. Indigenous communities therefore prefer the swift justice delivered by extremists (such as the Naxalites and Maoists) flourishing in the hinterlands over the procrastinated conventional Court system to which they are unaccustomed. They thus become ready recruits for extremist groups like the Maoists in central and south India who promise protection of the tribes' natural rights in return for material and political support<sup>3</sup>.

### *Judicial interventions in land justice at Higher level:*

The scope of the meaning of word 'Transfer' under Land Transfer Regulation 1 of 59 as amended by 1 of 70 is expanded to provide legal justice to tribals for retrieval of lands lost to non tribals through interpretations by the High Court of Andhra Pradesh as well as Supreme Court. The

2. *K. Balagopal* in his foreword to *P. Trinadha Rao*, op.cit., p.1)

3. See "A Specter Haunting India" *The Economist* (17 August 2006), online : <[http://www.economist.com/world/asia/displaystory.cfm?story\\_id=7799247](http://www.economist.com/world/asia/displaystory.cfm?story_id=7799247)>.

word transfer is included the acts of “forcible dispossession and encroachment of tribal lands by outsiders”. So a dispossessed tribal is entitled to restoration of possession of his land<sup>4</sup>. The word **“Other dealing” in the definition of the word Transfer under Land Transfer Regulations also embraces**, allotment of shops in Bus stands in Agency Areas by means of tenders in the form of licence. The word ‘licence’ can be read under the general expression ‘other dealings’ used in Section 2(g) of the Regulation. Hence even permitting non tribal commercial establishments by the State is also banned under the Regulation<sup>5</sup>. The Supreme Court while dealing a case under “Orissa Scheduled Areas Transfer of immovable Property (By Scheduled Tribes) Regulation (2 of 1956) held that ‘Transfer of immovable property’ by ST – Expression ‘transfer’ – includes any ‘dealing’ with such property – Word ‘deal with’ not defined in Statute – Dictionary meaning if taken as safe guide can be extended to achieve legislative object of Act – Transaction or dealing with immovable property having effect of extinguishing title of member of aboriginal tribe – and vesting same in non-tribal – Is construed as ‘transfer of immovable property’<sup>6</sup>.

Further the word ‘Exchange’ in the definition of ‘transfer’ also includes exchange of shared immovable properties among family members in Fifth Scheduled Areas. Partition of family properties is permitted but not exchange of properties during the partition of inherited family properties by non tribals<sup>7</sup>. The High Court of AP further held that the word “Transfer” includes

“contract to sell”<sup>8</sup>. To make available the Government lands for tribals cultivation, the High Court of A.P further expanded the definition holding that even if land classified as Gayalu/Government poramboke, person who is in possession of such land must be said to be dealing with such immovable property. Therefore same falls within scope of “Transfer” as defined under Section 2(g) of the Regulation<sup>9</sup>.

The Supreme Court held that the word ‘person’ in Section 3(1) of the Land Transfer Regulations would also include both natural persons as well as juristic person, and Constitutional Government. Therefore transfer of land by juristic persons or allotment of land by State to non tribals, stands prohibited. This ruling restricts the Power of Government to grant leases to non tribals in agency areas for mining or any other purposes. Constitution of India, Article 21 guarantees “Right to life”. Right to life means something more than mere survival of animal existence. Thus tribals have fundamental right to social and economic empowerment<sup>10</sup>.

The laws made applicable to the scheduled areas indicate an anxiety to safeguard the interest of the tribals in the scheduled areas and to see that the land in the scheduled areas should be in possession of tribals only. The High Court of Andhra Pradesh held that the object seems to be that all the immovable properties in Agency Tracts, as far as possible, must be restored back to the tribals, which was held by tribals at one time. Therefore a non tribal transferor after the commencement of Land Transfer Regulations 1 of 70 can not seek restoration

4. *M. Suresh Bhargava and another v. State of Andhra Pradesh and others*, 1989 (2) ALT 516

5. *Adarsba Adivasi Mahila Samithi and others v. Agent to the Government Khammam and others*, 2003 (5) ALD 284.

6. *Amrendra Prapat Singh, Appellant v. Tej Babadur Prajapati and others*, AIR 2004 SC 3782.

7. *Asbok v. Baba Rao and another*, 2002 (6) ALT 296.

8. *(Kakarla Nageswara Rao and others v. Government of A.P. rep. by its Secretary (Tribal Welfare) Dept. Hyderabad*, 1995 (3) ALT 164).

9. *Vuppuluri Veera Venkata Raju and others v. Special Deputy Tahsildar, Tribal Welfare, Gangavaram (V&M), E.G. District and others*, 2007 (6) ALD 292.

10. *Samata Appellants v. State of Andhra Pradesh and others with Ms. Hyderabad abrasives and Minerals (P) Ltd., (appellant) & State of Andhra Pradesh and others, Respondents*, AIR 1997 SC 3297.

of the alienated land to another non tribal nor the non tribal transferee can claim for retention of the land<sup>11</sup>.

***Land Transfer Regulation prevails over other laws:***

Governments time to time issued several Government Orders protecting the landed interest of non tribals due to political pressures. However the High Court of Andhra Pradesh came to the rescue of tribals in protecting their interest observing that such GOs are illegal and without jurisdiction<sup>12</sup>. Similarly in another similar case, High Court held that the GOs 41 and GO Ms 951 in 74 prohibiting eviction of non-tribal Sivai Zamadars in occupation of Government lands in Scheduled areas are against the provisions of tribal protective Land Transfer Regulations 1 of 70<sup>13</sup>.

The High Court of AP even held that the lands situated in the scheduled areas cannot be acquired under Land Acquisition Act for providing house-sites even to Scheduled Castes *de hors* the Regulation<sup>14</sup>.

The constitutional importance of the Land Transfer Regulation as amended by Regulation 1 of 1970 underlined by the High Court of AP observing that the Regulations 1 of 70 prevails over the provisions of Regulation 2 of 1970 Ryotwari Settlement Regulations and no Ryotwari patta can be granted in violation of the provisions of Regulation 1 of 1970 – Such a patta would not bind the Authorities under Regulation 1 of 1970<sup>15</sup>.

The main purpose of A.P. Scheduled area Land Transfer Regulations 1 of 59 is to invalidate any transfer of lands situated in agency tracts in favour of non-tribal. Where the Regulation 1 of 59 decides that possession and occupation of the non tribal is void that would prevail against any ryotwari patta that might have been granted under Regulation II of 1970. Therefore any decision made under Regulation II of 1970 can only be tentative and provisional and would be subject to the decision under Regulation 1 of 59<sup>16</sup>.

The prohibition against transfer and the declaration of nullity enjoined under Amended Land Transfer Regulation having been held to be an emanation of Para 5(2) of the Fifth Schedule to the Constitution itself, the determination of invalidity declared under the provisions of Land Transfer Regulations will have to be held as overriding any contrary determination under any other Regulation<sup>17</sup>.

***Applicability of principle of Resjudicata :***

Even the High Court of AP is not inclined to apply the Principle of *Resjudicata* to the tribal land alienation cases under the Regulations, but given a restrictive frame for its application. It is held that orders passed in the first proceedings initiated under the Regulation will not operate as *Resjudicata* if the later proceedings were initiated by third party or by the same party on the basis of any further material<sup>18</sup>. Further held that held, the earlier proceedings do not operate as *Resjudicate* in the present proceedings if the question involved in the earlier proceedings is distinct and different from the one on

11. *Vemana Somalamma and another (Appl.), Veera Sunkar Deo and another (pet.) v. Deputy Collector (TW), Rampachodavaram, E.G. District*, 1993 (1) ALT 409 (FB)

12. *A.P. Girijan Welfare Students and Youth Union v. State of A.P.*, WP No.1755/90 dated 5.12.1984

13. *P. Gangamma v. Vasudha Misra and another*, 1998 (2) ALD 35.

14. *Koppula Saramma v. Government of A.P. Social Welfare Dept. and others*, 2001 (3) ALT 501.

15. *Gadde Nagabushanamma v. Govt. of A.P. and others*, 1999 (5) ALD 430.

16. *Kandula Brahmaiah v. The Deputy Collector (Tribal Welfare) Rampachodavaram, E.G. District*, WP 2169/1981 dated 10.12.1986-un reported.

17. *Samatha v. State of A.P.*, AIR 1997 SC 3297

18. *(N. Durga Rao and another v. Special Deputy Collector (TW) Kota Ramachandrapuram W.G. District and others*, 2003 (6) ALD (NOC 68)).

the basis of which the present proceedings are initiated<sup>19</sup>.

Mere fact that on the earlier occasion a petition filed under Land Transfer Regulation 1959, was dismissed does not confer any right on the non tribal so long as the Statutory order subsists, viz., the void sale subsists. The Statute prescribes that any transaction entered into between a tribal and not tribal or between non tribal and a non tribal, they are void *per se*<sup>20</sup>.

### ***Tribal land Justice is deprived:***

However, judicial activism has put an obstacle to the very objective of Land Transfer Regulations. The Supreme Court of India held that the Andhra Pradesh Scheduled Areas Land Transfer Regulation (1 of 1959), Section 3 (as it stood before and after amendment in 1963 and 1970), prohibition to transfer of immovable properties in scheduled area operates prospectively. This means the Regulations do not adversely affect completed transactions of transfer which have taken place prior to enforcement of Regulations<sup>21</sup>.

Dealing with a Tribal Land question situated in Telangana area, the High Court applied the same principle and held that authorities acting under the said Regulation cannot interfere with the alienations effected prior to the commencement of the Regulation 1/1970. If the said transactions are illegal in view of any other provisions of law, it is for the appropriate Forum to take action but they cannot be declared void by Deputy Collector acting under Section 3

of Regulation 1/1970. The Court held that the authorities under Regulation while admitting the transfer to be prior to 1.12.1963 cannot set aside the same on the ground that it was by an unregistered sale deed and therefore not valid. There is no jurisdiction or power conferred on authority to question the validity of alienation otherwise than being in contravention of the regulation<sup>22</sup>. Therefore these rulings give a wider scope to non tribals to escape from the clutches of tribal protective land laws, and manipulation of anti dated unregistered agreements and sale deeds.

The ruling of AP High Court further weakened the unwilling State in enforcing the Land Transfer Regulations. The Regulations have provided *suo motu* power to initiate proceedings against non tribal occupants in the scheduled areas. However the ruling of the Court has limited its power affecting the tribal land rights. The High Court of A.P held that exercising a *suo motu* power after a lapse of reasonable time would be arbitrary and contrary to the principle of 'Rule of Law' enshrined in the Constitution and exercising such a *suo motu* power after 14 or 15 years would be *ipso facto* unreasonable<sup>23</sup>.

However the Courts in other cases have taken an adverse stand to the decision of the Supreme Court in *P. Ramireddy v. State of Andhra Pradesh* which stands for tribal land justice. The Supreme Court was pleased to hold that the legislation which in essence and substance aims at restoration to the 'tribals' of the lands which originally belonged to the 'tribals' but which passed into the hands of 'non-tribals' in the aforesaid background certainly cannot be characterized as unreasonable. True, transfer by 'non-tribals' to 'non-tribals' would not diminish the pool. As a matter of fact it would be unjust, unfair

19. *(Special Deputy Collector (TW), Rampachodavaram, E.G. District and others v. Datla Venkapatbi Raju and others*, 2003 (1) ALD 386 (DB)) Similar view was taken by the Court in *G. Nageswararao @ China Nageswararao v. Government of A.P. and others*, 2007 (6) ALD 621)

20. *Ch. Satyanarayana v. The Agent to Govt. & Dist. Collector, Visakhapatnam*, WP 6065/1979-unreported.

21. *Deputy Collector v. Venkata Ramanaiah and another*, AIR 1996 SC 224.

22. *K. Mahalaxmi and another v. Government of Andhra Pradesh and others*, 2000 (5) ALD 588.

23. *Kola Mahalaxmi v. Agent to Government, Khammam and others*, 1999 (6) ALD 718.

and highly unreasonable merely to freeze the situation instead of reversing the injustice and restoring the *status-quo-ante*<sup>24</sup>.

Therefore the decisions of A.P. High Court in *Kola Mahalakshmi* case stands as legal hurdle for the efforts of either State or individual tribals in seeking land justice for the tribals.

### **Conclusions:**

Justice must be seen in a broader perspective without confining to the fixed lens of legal frame work particularly in the context of prevalence of in equal societies. There is a continued conflict between customary laws of tribals and codified law in dispensation of justice. The Legal Institutions give priority to codified law which never recognized the customary law of tribals governing natural resources. The State is expecting justice in the given frame

work of legal institutions which are not apt to deal the land alienation problem of tribals. Tribals seek simple form of justice without any elaborate legal procedure and giving any scope for weighting the justice based on land records which are invariably in favor of non tribals. As rightly observed by the Supreme Court in *P. Ramireddy* case that the community cannot shut its eyes to the fact that the competition between the tribals and non tribals partakes the character of the race between a handicapped one legged person and an able two legged person. It would be unfair to the State to continue the race using the present legal frame work in rendering justice to tribals. Therefore the present alien legal system is not an appropriate forum for administration of justice and an alternative dispute resolution mechanism must be put in place to deliver the land justice to tribals by amending the laws to suit the factual context.

## **DISCIPLINE IN INDIAN INDUSTRY – A BRIEF STUDY**

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Discipline in the Industrial setup is very important and essential to build a healthy atmosphere for industrial production and labour welfare. Indiscipline destroys the cordial atmosphere and relation between the employer and employee. Indiscipline is considered as a serious menace in any institution such as family, society, country and also in any of the organisation, trade unions, religious organisations and political parties. Discipline is corner stone of the institution without which there will not be any progress and success.

Labour Laws and Labour welfare have become very important in independent India. The developing concept of social justice and social security are effecting far-reaching changes in labour laws in India. It is very unfortunate that majority of the workers are not knowing of their rights and the position of labour laws. There are many misunderstanding and conflicts between employer and employee which resulted due to ignorance of these rights and obligations. It is also pointed out that the employer is also not always fully aware of all laws specially those connected to his duties and obligations towards his employees. Adequate

24. *P. Rami Reddy and others v. State of A.P. and another*, (1988) 22 Reports (SC) 364.