

Memorandum to Ministry of Social Justice and Empowerment (MoSJE) on Strengthening the NAMASTE Scheme

Submitted by National Faecal Sludge and Septage Management (NFSSM) Alliance

Introducing NFSSM Alliance:

The NFSSM Alliance is a collaborative, multi stakeholder platform driving transformative change in India’s sanitation sector. It is a national working group comprising 30+ organisations and 120+ experts across India. By harnessing collective knowledge, fostering strategic partnerships, and nurturing innovation, the Alliance works to create an enabling environment for universal, equitable, and inclusive sanitation for all.

Since its inception, the Alliance has worked in close collaboration with national, state, and city governments, as well as key ministries and missions such as the Ministry of Housing and Urban Affairs (MoHUA), Ministry of Social Justice and Empowerment (MoSJE), Department of Drinking Water and Sanitation (DWS) under the Ministry of Jal Shakti, National Mission for Clean Ganga (NMCG), National Urban Livelihoods Mission (NULM), Central Public Health and Environmental Engineering Organisation (CPHEEO), NITI Aayog. The Alliance has also worked with state departments such as Housing and Urban Affairs Department (HuDD), Govt. of Odisha and the State Finance Commission of Haryana among others.

Drawing on learnings from organisations working across Indian states on sanitation worker programmes, the NFSSM Alliance submits this memorandum to support MoSJE in broadening and deepening the impact of the NAMASTE Scheme.

Detailed Recommendations on the NAMASTE Scheme:

Sr No	Observations	Recommendations
1	<p>Institutional Strengthening of RSAs/SRUs and Capacity Building for Sanitation workers</p> <p>While Responsible Sanitation Authorities (RSAs), Sanitation Response Units (SRUs), and Emergency Response Sanitation Units (ERSUs) have been notified, their functionality needs to be prioritised. Many units remain under-resourced with limited institutional capacity, particularly in small and medium towns to effectively implement NAMASTE.</p> <p>Core systems, such as grievance redressal mechanisms, require significant strengthening to ensure that sanitation workers are adequately protected. Additionally,</p>	<ul style="list-style-type: none"> ● Institutional strengthening of RSAs/SRUs/ERSUs with dedicated staffing, clear SOPs, budgetary allocations, and accountability frameworks to ensure consistent functionality across all ULBs guided by requirements as per population division and area context. While ERSUs established for larger ULBs in the district need guidance on population and area-based criteria, a cluster based or shared-service approach can be implemented for smaller ULBs in the districts to ensure optimum resource allocation. Establish Sanitation Worker Hubs (district/ULB) for welfare, Occupational Safety and Health, grievances, and entitlements. Ensure diverse worker participation, including women and transgender workers, in decision making. ● Recommend periodic review and reporting of RSA/SRU performance at institutional level, with sanitation worker participation built into governance. Develop monthly Drill Protocols,

<p>duplication in worker registration persists, reducing administrative efficiency and transparency, and hampering coordinated service delivery.</p> <p>Building robust institutional capacity within RSAs and SRUs is therefore essential for efficient scheme implementation. Strengthened institutions can ensure the safety, dignity, and entitlements of sanitation workers while improving overall operational effectiveness, enabling the program to deliver on its objectives in a sustainable and systemic manner.</p>	<p>similar to other emergency services, to ensure maintenance and inspection of procured sanitation equipment, and periodic training of sanitation workers (Safaimitra Drill).</p> <ul style="list-style-type: none"> ● Regular needs assessments and feedback loops at local level must be institutionalised so sanitation workers can directly raise concerns, ensuring services and entitlements remain worker centric, such as Swachh Survekshan periodic review. ● Establish and empower Rehabilitation and Incubation Cells at the State level (within relevant institutions such as State Safaikarmachari Finance Development Corporations), mandated and financed to work with civil society, ULBs, and government departments. These Cells should serve as hubs for outreach and mobilisation of workers, collectivisation and enterprise incubation, identification and testing of new technologies, and coordination of capacity building training and transition support for workers. ● Strengthen training and capacity building for sanitation workers (contractual employees with ULBs & Private Sanitation Service Organisations (PSSOs) as well as organized workers through SHGs) by leveraging NUDM, state training academies, and other institutional platforms. Training must be structured, certified, and continuous, with regular refresher modules (digital and print formats) and complementary training resources such as videos, gamified scenario based training, etc. for ULB staff, SRU functionaries, and sanitation workers. Include Recognition of Prior Learning (RPL) as part of the training framework so that sanitation workers' prior experience is formally certified. ● Set up and operationalise Internal Committees (ICs) under POSH in all ULBs and raise awareness of workers, about grievance redressal under the Act. Additionally, build capacity of municipal officials on gender, caste, and occupational health dimensions. ● Develop concise training modules for sanitation workers to integrate: <ul style="list-style-type: none"> ○ Disaster preparedness and Occupational Health Safety for small towns with limited sanitation infrastructure. ○ Awareness of rights and entitlements (E-Shram, Ayushman Bharat PMJAY, insurance schemes, pensions).
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2	<p>Revisiting cost allocations for machinery and strengthening financing towards effective mechanization</p> <p>While NAMASTE has successfully accelerated mechanization, high machinery costs remain a barrier for many ULBs, especially in small and medium towns. Current procurement is fragmented, leading to inefficiencies and duplication, and much of the available equipment requires adaptation to local geographies or climate risks (e.g., flood-prone regions, hilly terrain, small towns with narrow lanes).</p> <p>Without dedicated financing for sanitation worker cooperatives and MSMEs limits their participation in mechanization services, restricting the development of sustainable local service ecosystems Without structured financing mechanization risks becoming a one-time capital expenditure rather than a long-term, systemic safety solution.</p>	<ul style="list-style-type: none"> ● Revisit cost allocations and financing models, that enable pooled procurement across ULBs and states to ensure optimum utilization of procured equipment. Leverage Public Private Partnerships (PPP) and leasing models, and utilise dedicated allocations under SBM, DAY-NULM, NSKFDC, and MoHUA to enable ULBs and sanitation worker collectives to procure machinery. ● Ensure climate-and geography-adaptive equipment: Prioritise procurement of portable, weather-proof, and lightweight machinery suited to hilly terrains, flood-prone, and water-logged areas, as well as compact designs for small and medium towns. Additionally, include a GIS methodology that accounts for desludging operations in flood-prone or hilly terrains, and consider factors like road width and slope that affect desludging activities, and costs. ● Ensure availability of PPEs and machinery through GeM Portal. Revise the CPHEEO calculator to include terrain-adapted technologies, estimate equipment and sewer professionals or small and medium towns. Ensure separate protocols for high-value equipment. ● Integrate gender-responsive budgeting to account for women and transgender workers' infrastructure needs (such as including menstrual hygiene supplies under PPE kits) ● Leverage enumeration data from MoSJE to guide machinery deployment: Align allocation of machinery and prioritise high-risk areas and zones with intensive manual work, ensuring mechanization directly reduces hazardous manual cleaning. ● Institutionalise O&M and service delivery models: Move beyond one-time equipment purchase by establishing robust operations, maintenance, and leasing frameworks that strengthen service delivery, ensure machine availability, and extend lifecycle use. ● Establish and strengthen financing windows for sanitation worker cooperatives and MSMEs in mechanization services. Further facilitate formation, formalization and

		<p>strengthening of SHGs towards sanitation service delivery. Earmark gender sensitive credit lines and subsidies for trans-and women-led SHGs.</p> <ul style="list-style-type: none"> ● Suggest including dedicated priority lending windows in banks for sanitation workers with simplified procedures, priority processing, and time-bound approvals. Establish a Social Security Fund at the national/state level to cover premium payments, emergency relief, and accident compensation for sanitation worker families.
3	<p>Promotion of Gender-Sensitive & Climate-Adaptive PPE Innovations</p> <p>PPE provision under NAMASTE needs strengthening to meet safety standards across climatic and hydrological conditions. Additionally, women and transgender sanitation workers remain inadequately catered to. Workers also often require training on proper PPE use, and enforcement is fragmented.</p>	<ul style="list-style-type: none"> ● Invest in Research & Design of PPE for sanitation workers: Co-develop PPE with sanitation workers, to ensure that it is gender-sensitive (ensuring fit, comfort, and safety for women), third-gender inclusive, and climate, hydrological and geography adaptive. Institutions such as National Institute of Design at IIT Bombay, or NIFT can be consulted for designing for all the genders. ● Ensure PPE compliance with the Indian Standard (IS) codes and develop a resource bank of OEMs across states and ULBs. ● Institutionalise quality standards and monitoring systems: Establish national standards for PPE quality, durability, and replacement cycles, with monitoring and reporting mechanisms to track distribution, usage, and compliance per CPHEEO’s SoP and Equipment and Workforce Norms. ● Integrate PPE usage into training and refresher courses: Build dedicated modules on correct PPE usage, maintenance, and occupational safety into skilling programs and ensure refresher training is mandatory. ● Disaster- and emergency-resilient provisions: Ensure availability of protective gear for sanitation workers in disaster-prone small and medium towns (floods, cyclones, landslides), where infrastructure is limited and risks are heightened. National Disaster Response Force (NDRF) and State Disaster Response Force (SDRF) can be leveraged to clarify the roles and responsibilities of the sanitation workers and provide training to fulfill the same during the disasters. ● Link PPE to worker safety and grievance platforms: Create clear channels for sanitation workers to provide feedback on PPE design,

		<p>usability, and gaps, feeding directly into procurement and policy reviews, through periodic audit at district and ULB levels.</p>
4	<p>Comprehensive Enumeration and Professionalization of Sanitation Work</p> <p>Enumeration through NAMASTE can be further strengthened by expanding its scope and covering all categories of sanitation workers. The enumeration may be duplicative where workers live in one ULB but work in another.</p> <p>Informal workers, waste pickers, STP/FSTP operators, and contractual staff are largely excluded. Further, costs of ULB-led enumeration are high, raising questions of sustainability. Additionally, the data collected by MoSJE has potential to be leveraged by other ministries for seamless convergence.</p>	<ul style="list-style-type: none"> ● Expand enumeration scope: In addition to sewer and septic workers and waste pickers, suggest covering <i>all categories</i> of sanitation workers including sewer and septic tank workers, waste pickers, SWM workers, informal and contractual staff, and STP/FSTP operators through systematic surveys and mapping exercises. This process can be carried out in collaboration with sanitation workers’ unions, Community-Based Organisations (CBOs), and NGOs to ensure accuracy, inclusivity, and trust-building with the worker communities. ● Enable inter-ministerial convergence: Ensure MoSJE enumeration data informs and integrates with: <ul style="list-style-type: none"> ○ MoHUA (mechanization and service delivery planning), ○ Labour Ministry (E-Shram, social security), ○ Health Ministry (Ayushman Bharat, insurance, health camps and check-ups at ULBs), ○ Skill Development (OHS, training and upskilling), ○ MoRD/DDWS (rural sanitation convergence). ● Strengthen professionalization through enumeration: Position enumeration not just as data collection but as a workforce planning tool — for profiling of sanitation workers, including identification and registration of all categories of sanitation workers, linking workers to structured service delivery models, accountability frameworks, and performance-based ULB incentives. ● Avoid duplication and ensure accuracy: Develop standard protocols to address overlaps where workers live in one ULB but are employed in another. ● Establish grievance redressal and feedback loops: Integrate worker-facing platforms within the NAMASTE portal, allowing sanitation workers to directly raise concerns on safety, welfare, and exclusion. ● Build learning systems: Capture and document both successes and challenges from enumeration exercises to continuously improve

		<p>design, planning, and ensure accountability.</p> <ul style="list-style-type: none"> ● Formalisation of Sanitation Workers: India’s 4 million informal waste workers play a vital role in recycling but face exclusion, limited recognition, and unsafe conditions; phased municipal integration can ensure safer work, social protection, and improve city-level recycling outcomes. ● Inclusive and Participatory Identification of Sanitation Workers (SSWs): Recognising the scale of informal sanitation work in India, identification and profiling of SSWs can happen in collaboration with existing CBOs, unions, cooperatives, and civil society organisations, which builds trust, strengthens outreach and support SHG formation.
5	<p>Urban–Rural Convergence in Service Delivery</p> <p>Although Responsible Sanitation Authorities (RSAs) and Sanitation Response Units (SRUs) were envisaged to serve both urban and rural areas, implementation remains predominantly urban-focused. As a result, sanitation workers in peri-urban and rural contexts are often unable to avail NAMASTE benefits and welfare provisions. Migrant workers or those engaged across multiple job roles face significant challenges in maintaining access to entitlements, as portability is limited. Small and medium towns, which have limited institutional capacity, are particularly vulnerable, with sanitation workers often left without adequate mechanization, PPE, or grievance redressal support. Without deliberate focus, NAMASTE risks excluding large portions of the sanitation workforce outside metros and larger ULBs.</p>	<ul style="list-style-type: none"> ● Strengthen district-level RSAs and SRUs: Ensure they cover both urban and rural sanitation workers, beyond large ULBs, by equipping them with resources, budgets, and accountability frameworks. ● Create Sanitation Worker Hubs: Institutionalise <i>Sanitation Worker Hubs</i> at ULB and Gram Panchayat levels to streamline welfare delivery, link workers to entitlements, and ensure visibility of peri-urban and rural workers. Drawing on the best practice at Rajasthan’s Sanitation hub model serves as a resource hub enabling workers to influence decision-making in policies, access entitlements via a Single Window system, and participate in governance, having been institutionalized by Urban Local Bodies. ● Develop district-level licensing arrangements for desludging operators and their machinery, while continuing to enumerate and register sanitation workers at ULB-level. This ensures that desludging operators can operate across urban and rural areas, expand their fleet within the district, and be subject to regulations surrounding waste dumping/treatment. ● Enable portability of entitlements: Establish systems to ensure workers retain benefits across geographies, ULBs, and job categories, recognising their mobility and multiple roles and migrant sanitation workers. ● Integrate caste, gender, and migration lenses into rural-urban programme design. ● Extend mechanization and PPE to peri-urban and rural areas: Ensure that workers

		<p>outside cities have access to mechanised solutions and climate- and geography-appropriate PPE, especially in flood-prone, hilly, or water-logged regions.</p> <ul style="list-style-type: none"> ● Common protocols and grievance systems: Develop shared databases, monitoring systems, and grievance redressal mechanisms that integrate workers across rural and urban jurisdictions. Institutionalise independent third-party audits and monitoring of scheme implementation and sanitation worker fatalities/incidents. Ensure representation of sanitation workers, including women and transgender persons, in state- and district-level monitoring committees. ● Disaster preparedness for small towns and rural areas: Incorporate training and equipment for disaster contexts (floods, landslides, epidemics), where workers are at heightened risk. ● Establish alternate livelihood pathways and transition support to sanitation workers: Provide SSWs the choice of either alternate livelihoods beyond sanitation, or sanitation service enterprises, which require financial support, counselling and handholding support.
6	<p>Systems strengthening, monitoring and convergence through streamlined access to benefits via single-window NAMASTE Portal</p> <p>There is a need for inter-ministerial convergence, to address fragmented welfare delivery, and limited accountability mechanisms limit NAMASTE’s effectiveness. The grievance helpline 14420 needs to be strengthened for redressal and ensuring that workers are aware of their entitlements. Current systems require integration of benefits across ministries with effective feedback loops from workers. Monitoring remains a challenge, while policy reviews require sanitation worker voices or gender-disaggregated data. Without a streamlined, integrated system, sanitation workers face barriers in accessing welfare, health,</p>	<ul style="list-style-type: none"> ● Establish a Single-Window NAMASTE Portal: Create a unified platform that integrates benefits across MoSJE, MoHUA, Health, Labour, Skill Development, and allied ministries. Ensure e-KYC integration so workers can seamlessly access insurance, pensions, healthcare, education, financial security, and welfare schemes. ● Operationalise the 14420 Helpline: Strengthen the helpline as a functional single point for grievance redressal and service coordination. Link it to empanelled desludging operators and ensure all ULBs adopt the same number for consistency. ● Convergence Platforms at State & District Levels: Establish multi-stakeholder convergence forums that bring together government departments, ULBs, private sector, entrepreneurs, and recycling industry actors to align welfare, service delivery, and professionalization of sanitation work. ● Stronger Monitoring and Accountability: Institutionalise independent audits, third-party monitoring, and worker representation

	<p>insurance, and skill development schemes.</p>	<p>in review processes. Mandate regular policy-level reviews that include sanitation worker participation, especially women and transgender workers.</p> <ul style="list-style-type: none"> ● Feedback and Learning Systems: Build structured feedback loops into the portal and state platforms so sanitation workers can raise concerns directly. Capture failures as well as successes to enable adaptive learning. ● Gender-Responsive Data Systems: Ensure all monitoring and reporting is supported by gender-disaggregated data to inform targeted interventions, training, and welfare provisions.
7	<p>Strengthening communication, behaviour change campaigns</p> <p>Despite NAMASTE’s progress on mechanization and welfare, sanitation workers continue to face deep stigma, invisibility, and low recognition. Current messaging is limited to hazard awareness and requires positioning sanitation as dignified, skilled, and professional work. The specific challenges of women and transgender workers are largely ignored, and safe spaces for sanitation workers remain scarce. This invisibility undermines professionalization and perpetuates exclusion, even as workers face daily occupational and social risks.</p>	<ul style="list-style-type: none"> ● National Communication Campaigns: Launch sustained positive media and behaviour change campaigns that reframe sanitation as skilled, professional, and dignified work. Campaigns should: promote the practice of routing all sewer/septic tank entry related requests through the Sanitation Resource Unit (SRU), ensuring that no informal worker undertakes sewer or septic tank work without informing and being monitored by the SRU. ● Showcase best practices and success stories, with emphasis on women and transgender workers. ● Highlight mechanization as a safety solution, while also educating about risks (e.g., causes of worker deaths, septic tank entry hazards) and preventive measures. Capacitate ULBs to conduct systematic mapping to identify critical infrastructure hotspots where mechanization is not feasible, and implement targeted safety measures, protocols, and alternative solutions to mitigate occupational risks in these areas. ● Reduce stigma by positioning sanitation workers as essential service providers in urban transformation. ● Safe Spaces and Recognition Platforms: Institutionalise facilities such as Garima Grihas and Viram Kendras across ULBs as safe spaces for rest, welfare access, and social dignity. These hubs can also act as recognition platforms and provide training, entitlements, and grievance support. Ensure availability safe changing space and access to toilets and childcare facilities for workers at work sites for trans persons and women. ● Worker-Centric Documentation and Narrative Building: Systematically document and amplify sanitation worker experiences

		<p>and best practices, especially of women and transgender workers, and feed them into training, communication, policy recommendations, and decision-making processes.</p> <ul style="list-style-type: none"> • Partner with sanitation worker unions and CSOs to design community-led IEC strategies, and integrate sanitation dignity education into schools and community curricula.
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Conclusion:

The NAMASTE scheme stands at a pivotal juncture. It represents a historic opportunity to end hazardous sanitation practices once and for all, while building a future where sanitation work is recognised as safe, dignified, and professionalised. Early progress on mechanization, enumeration, and welfare linkages demonstrates strong intent; however, the scale of the challenge demands that the scheme further evolves into a more robust, and integrated national programme.

As India advances towards its vision of inclusive and resilient urbanisation, sanitation workers must be placed at the very centre of this transformation. This requires **scaling mechanization, capacity building for workers, strengthening inter-departmental convergence**, and driving systemic reforms that **prioritise gender and climate responsiveness, innovation, and professional dignity-centred communication**.

The NFSSM Alliance kindly recommends the Ministry of Social Justice and Empowerment to adopt the consolidated recommendations to safeguard the lives and livelihoods of sanitation workers, strengthen service delivery systems, accelerate urban resilience, and reflect India’s leadership in inclusive development.

References:

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