

# **‘Document’ and North-Indian Labour Migrants: Governing Labour Mobility in Manipur**

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## **Abstract**

Drawing upon in-depth interviews with labour migrants in Manipur and the use of Foucault’s ‘governmentality’, we argue that ILP and state surveillance as a tool are governing the 'conduct' of labour migrants in Manipur. Regular documents checked to ensure their legal status, which results into labour migrant’s social, economic, and psychological insecurity. Police and security personnel often conduct search operations in various localities of Manipur. Though this is the regular practice of government to ensure security, but this regular practice of the state became means to harass, exclude, detain, and extort money from labour migrants if they fail to prove their legal status. Besides this, police personnel randomly check the documents of labour migrants with motives to extort money which is an additional financial burden.

We intend to examine the history, trajectory, and significance of documents for labour migrants in the existing literature. Further, we explore the power dynamics between state and labour migrants in Manipur to govern the 'conduct' of labour mobility through ILP and their legal status. Besides, we shall highlight the negotiation and navigation strategy of labour migrants to overcome from regular state surveillance, detention, and police harassment.

**Keywords:** Labour, ILP, State, Migrants, and governmentality

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## **Introduction**

Like any ordinary citizen in India, labour migrants also possess various documents such as Aadhar cards, pan cards, bank passbooks, driving license, health care cards, ration cards, electoral cards etc., which serve various purposes during their migration (Axelsson et al., 2022, p. 603; Czajka, 2014, p. 159; Prasad-Aleyamma, 2018, p. 2). Besides the specific purpose of these documents, they use them to prove their identity and citizenship in the various span of their mobile life (Abbas, 2016, pp. 152–153). Migrants' possession of certain documents, including Aadhar, does not merely prove their legal status but often becomes a gate pass for inclusion and exclusion from various social security measures. But migrants are underprivileged in even getting their entitlement due to the lack of documents at their destination. Datta (2020) noted in her study that despite working at a destination for a long time, very few migrants possess documents such as ration cards, voter IDs, Aadhar cards, pan cards, and even bank accounts at their destination (p. 1158). The significance of documents can be understood in Horton's (2020) assertion that "Migrants may agentively and creatively engage with official documents and those who bestow, verify, and check them...migrants are acutely aware that valid documents are a scarce form of capital in migrant communities; they open the doors to other forms of capital, such as the ability to travel, to access driver's licenses, to find a job, or to access public benefits" (p. 13). They carry these documents with them because it provides them with a sense of security during their migration. Though documents are meant to serve a specific purpose—identity proof, disbursement of welfare schemes, and entitlement, but they often become a contested site of sharing the power dynamics between state and labour migrants at various locations of destination. Horton (2020) has noted in her study that state-issued identity cards may confer legal status to migrants, but often 'legible' information associated with identity cards and documents makes them more vulnerable (p. 6). Despite the vulnerability associated with government-issued identity cards and documents, migrants are forced to apply and get those documents. Aadhar is one of the classic examples which legitimately made migrants to enrolled in Aadhar involuntarily. The persuasive way of implementing Aadhar enrollment forced labour migrants to return to their villages and get valid proof to enrol in Aadhar. Many pre-existing norms drive migrants to enrol and procure Aadhar cards. In the words of Baxi (2019), "Bureaucratic rules demanding proof of local settlement guide state-citizen interactions for various programmes, and

local identification documents certify claims to social protection schemes. These pre-existing norms are being reproduced in the process of procuring an Aadhaar number...” (p. 563).

In addition to the compulsion of having an Aadhar card and other documents at the destination as a medium of 'conducting the conduct' of poor labour migrants, vulnerability and insecurity discipline them to behave in a particular manner. Jha & Pankaj (2021) noted in their study that labour migrants migrated from so-called backward areas to relatively developed ones to find livelihood in insecure and informal work, further positioning them to self-regulate themselves accordingly. In addition, implicit prescription of insecure and hostile work environment contributes to making them prone to 'conduct their conduct' (p. 207). Their vulnerability is often associated with more worry when they feel alienated and 'other' at their destination because of the contested process of migration that competed with locals for jobs and other economic benefits. In the context of migration in Manipur, the people of Manipur often feel vulnerable and insecure due to the uncontrolled influx of migrants in the state (Meitei and Arunkumar, 2017, p. 249). However, the imposition of an Inner Line Permit (ILP) tends to make migrants in Manipur more insecure and vulnerable because one of the aims of ILP is to 'force migrant workers out of Manipur' (Thoudam, 2021, p. 1). Therefore, the article is an attempt to understand the dynamics of migrants' possession of documents and its influence on disciplining labour migrants in Manipur. In addition, the article also tries to examine contestation between labour migrants and the state because of the imposition of ILP that govern the conduct of labour migrants.

### **Methodological and Theoretical Context**

The article aims to examine the experience of labour migrants concerned with the possession and access of various document and their struggle with the unavailability of various documents—Aadhar card, ILP, voter Id card etc. Labour migrant in this article refers to the Migrants from north Indian states—Bihar, Uttar Pradesh, Jharkhand, Madhya Pradesh, and Chhattisgarh working in the informal sector, such as the construction and service sector; and currently living in Manipur. The observation and analysis are based on the direct engagement of authors in the field and the help of a research assistant. The paper is based on the research project titled 'Migrant Workers and Urbanisation in Politically Sensitive Areas: A Study in Kashmir and Manipur', funded by ICSSR, New Delhi. As part of the project fieldwork along with the research assistant, authors were also engaged in the field to collect data. The author used in-depth narrative interviews as an approach to capture the existing narrative about everyday forms of struggle,

issues, and challenges of labour migrants to own various documents and how these documents provide an easy way out for the state to govern the migratory movement of labour migrants in Manipur. In order to gather qualitative data, narrative interviewing creates a story throughout the interview (Kartch) (2017, p.1072). “Narrative interviewing is a method of qualitative data collection whereby a story is generated through the interview” (Kartch (2017, p.1072). The substantially longer interviews also made it necessary to use a smaller sample size for the study, which provided an initial obstacle for participants in framing their experiences as stories (Anderson & Kirkpatrick, 2016). It also has the advantages of being "flexible, less structured, and more [in-depth] conversational in the format" (Field-Springer, 2017, p. 800). Therefore, we used in-depth narrative interviews to trace the experience of labour migrants and their negotiation strategy to deal with the state. A total of thirty qualitative interviews were conducted as data was getting saturated. Reflecting on fieldwork experiences and data analysis, this article highlights that lack of documentation became a medium of state impunity to exploit and harass labour migrants. Besides, the state uses ILP as a source to discipline and govern labour migrants at various facets of their migratory movement. However, amid these issues and challenges, labour migrants found ways to escape state surveillance and prevent police exertion of money.

The theoretical underpinning of the article is Michel Foucault's 'governmentality' that anchored the argument of the article to highlight state action of governing migration and labour mobility. Foucault's theoretical formulation provides a direction to investigate the implication of state action and security check-in disciplining the labour migrant's mobility in Manipur. Foucault refers to governmentality as a complex power structure "that has the people as its objective, political economy as its major form of knowledge, and security apparatuses as its essential technological instrument" (2009:107–8). Thought and technique together comprise the ensemble of "institutions, procedures, analyses and reflections, the calculations and tactics" through which governmental interventions are devised and conduct the conduct (Foucault, 2009: 102; Muller, 2011, p. 5). Dean (2017) has noted in his pioneer work that “governmentality...address the rationalities and technology of governing in modern societies”. Dean has provided three layers of Foucault’s governmentality (i) it is a chronological process by which the state governs the population and civil society (ii) it is a field of power relation that governs through regulation of 'self-government of individual and collective actors' (iii) it is a ‘form of analysis that links the study of the government of the self and the government of others’ (ibid, p. 1). Governmentality

tends to be techniques, tools, and practices that use persuasion over coercion to manage, discipline, regulate, and govern individuals, communities, and society. Governmentality as an approach provides a lens that allows us to investigate and examine various facets of labour migrant's life in the context of documents and documentary proof that enable the state to discipline them in a particular manner.

The data for this article were triangulated from the following sources: (1) field observation and documentation, (2) in-depth interviews of labour migrants in the studied area, (3) an analysis of secondary literature like reports from local newspapers, government policy briefs, article and books related to labour migrants, ILP, politics, identity, and document.

### **Documents and Labour Migrants: History, Trajectory, and Significance**

Document and documentation have a rich and strong presence in the history of humankind. Post-world war, the colonial government introduced many popular documents that largely emerged as a tool to dominate everyday social and economic life (Sriraman, 2018, p. 2). She further noted in her iconic work that the ration card was the first document in its kind of ID document, which was introduced at the mass level during colonial rule. (p. 2). Later, many documents were introduced by the colonial and postcolonial governments in India, such as passports, voter Id cards, Pan cards, caste certificates, residential proof, Aadhar cards etc. However, in the context of labour migrants, the colonial government regulated indenture contracts for labour retention warranty. It was a kind of binding between two groups—indentured and colonial government. This was a legal document of indenture to lease their freedom for a particular period, wages, and conveniences (Ramsarran, 2008, p. 178).

Precisely the contract documents of indenture were essential for documentary proof of their terms and conditions—wages, amenities, and period of service to serve specific government and organisation. However, it is not easy for migrants to access and possess such a document which makes them entitled to get benefits of state welfare services at their destination. Abbas, (2016) has illustrated in detail about struggle and challenges of labour migrants in access to entitlement at their destination. In her own words, “According to national policy, to get a new ration card, a migrant must offer documentary proof that his name does not appear on any other ration card. In practice, migrants find it difficult to do this. Many do not know the procedure for obtaining a new ration card, and many others, who have never had a ration card, to begin with, find it difficult to obtain proof for something that does not exist” (p. 159). Such an experience of

migrants became harsher when there was a strong presence of the notion of 'son of the soil' at the destination. It is often overheard that migration is one of the contentious processes because migrants compete with locals for jobs and other economic benefits. In the context of migration in Manipur, the people of Manipur often feel vulnerable and insecure due to the uncontrolled influx of migrants in the state (Meitei and Arunkumar, 2017, p. 249).

In migration facilitation, documents and paper describe social and power relations (Grappi, 2022, p. 109). She strongly emphasises that documents and papers are being produced by many 'authorities', state agents, and other officials involved in regulating and governing migration through various documents such as visas (p. 109). The state meditates documents and papers of labour migrants through its various channel and agents, which subsequently help the state to maintain the power balance and discipline the migratory labour. Prasad-Aleyamma (2018) highlighted in his study that 'migration radically alters the meaning of identification document'. It works as a medium of the process by which the state brings territory to the fore, reproducing the surveillance through the specification of border and boundary (p. 3). Putting it differently, identity documents are helpful to the state in disciplining and governing the labour migrants because the document provides boundary demarcation that often helps the state to regulate labour mobility. The significance of the document for labour migrants could be understood when a large number of labour migrants were excluded from various government schemes during the recent pandemic. Due to a lack of information and migration from sources, a significant proportion of migrants missed linking their Aadhar to their bank account, which subsequently denied their entitlement (Rajan et al., 2020, pp. 1026–1027). 'Liminality—neither here nor there and non-portability of benefits of welfare schemes, deny their entitlement and reinforce precarity (Jha & Vyas, 2021, p. 6).

Similarly, Srivastava (2020) has shown that migrants in urban failed to access local entitlement because to acquire any entitlement in an urban ration card is mandatory. While ration cards require valid residential proof, they mostly fail because of their temporary and mobile status (p. 12). However, despite its disciplinary nature, Aadhar could be useful in the transfer of rights and entitlement of labour migrants from one state to another (Kumar, 2011, p. 21). In other words, Aadhar, as a unique identification document, can play a vital role in the portability of entitlement for labour migrants from source to destination. From colonial to postcolonial government, documents have been one of the critical proofs not merely to prove one's identity but also to

ensure and facilitate social welfare schemes. Labour migrants' identity, movement, entitlement, legality, illegality, and welfare revolve around a piece of paper—documents and identity cards. Because along with proof of identity, possession of documents mediate access to the welfare scheme and provides the legal guarantee of entitlement. However, although documents are very crucial for labour migrants, it also becomes a medium for the state to govern and regulate labour migration and curtail the rights of labour migrants by citing the excuse of documentation and other required paper (Jha & Vyas, 2021 p. 6; Srivastava, 2020, p. 12-13).

### **State and Labour Migrants: Conducting the Conduct through ‘Document’**

The state does not merely use various tactic and mechanism to discipline its citizen but also disseminate welfare schemes through various documentary evidence as a governance tool. Jha et al. (2013) asserted that migrants in Mumbai are often forced through various Acts and government legislation to produce documentary evidence that they have been residing in the city before 1995 to claim their accommodation and prevent eviction. Failing to produce documentary proof excludes many of them from the benefit of alternative housing schemes (p. 47). The state policy and governance often apply the 'individualisation technique' by making compulsory documentary proof of an individual to justify their legality of habitation and ensuring rights and entitlement (M. K. Jha, 2011, p. 6). In the words of Jha (2011), “the urban poor are frequently in a situation where the process of governance results in making them more insecure and deprived under the rubric of their ‘illegality’” (ibid, p. 6). Documentary evidence is being utilised as a governance tool through the implication of legal and illegal for urban poor in the city. Such a tool denotes the notion of Foucault's governmentality that refers to an idea of self-regulation—'conducting the conduct of conduct' (Dean, 2017, p. 2). Poor labour migrants in Manipur often go through a similar notion of governmentality in the course of their migration. Suresh, a 39-year migrant, shared his experience in his journey from Bihar to Manipur:

There was not much problem until I reached Nagaland because, at Nagaland (Mao gate), I started facing problems for a pass [Inner Line Permit]. The pass was like a specific document or deed. Those who came to Manipur for the first time have to spend Rs. 50/- to Rs. 100/- to get the pass, but those who had already visited Manipur can travel on the same pass until the validity gets over. And those who lost their passes have to pay a fine.

It is understood that ILP is a measure introduced by the government to keep track of non-local persons, but the narrative entails that it became the reason for trouble for migrants, particularly for the new migrants. The ILP is being issued as a documentary permit for migrants to enter the state of Manipur, putting an additional burden on finance. Though Rs. 50 to 100 seems a very small amount, but for a poor labour migrant, it could be an additional financial burden which may increase if they lose the ILP pass. The anxiety of Suresh about ILP could be understood easily while looking at one of the objectives of ILP, which advocates keeping migrants out of Manipur (Thoudam, 2021, p. 1). The fundamental politics of the ILP movement in Manipur can be understood through the assertion of McDuire-Ra (2016), “In excluding the non-Manipuri [migrant] population from the city, the ILP issue also constructs the notion of a shared indigenous identity, or at the very least a sense of who is legitimately entitled to dwell in the city” (p. 114). However, the introduction of ILP was meant to control the influx of migration in the state that was a danger to indigeneity of Manipuri identity and insecurity due to control of migrants over the business, trades, and labour market (McDuire-Ra, 2016, p. 109). But while narratives of Suresh suggest ILP seems to become legal documentary proof for migrants to enter in Manipur and a tool and technique for the state to govern their mobility in the state. Governmentality explains such a situation in a more nuanced and threads out its complexity. The process of ILP and making it mandatory for entry in Manipur seems influenced by what Madsen (2014) noted about governmentality as a 'ensembles formed by institution, procedures, analysis, and reflection, calculation, and tactic' which allow the state to exercise its power over the targeted population–labour migrants. Moreover, the state uses security personnel to discipline labour migrants and behave in a particular way. Another participant, Rakesh, shared his experience of police harassment:

There are much random police frisking or routine checking on the way. But I was hardly stopped by the police for random frisking or out of suspicion. Sometimes they used to come to my rented room, mainly at the time 26<sup>th</sup> of January i.e., republic day, for document verifications. So, I used to show them my documents, and they will check them properly and then just leave.

The narrative of Rakesh entails routine security surveillance of labour migrants in the state. Surveillance and random security checks are often conducted in various locations of migrant workers in Manipur during important occasions such as republic day. The narrative of Rakesh



emphasised how the state tracks the migrants and perceives them as a security threat. The part of the narrative, "I used to show them my documents, and they will check it properly and then just leave, " highlights the 'discipline' that labour migrants internalise in their everyday life. Chhotu, another participant, shared his experience of documents checking:

...we got checked at the way more often. The police personnel often asked us to show our Aadhaar cards and voter Id card. But nowadays, they also ask us to show the ILP pass. The police personnel also took money (Rs. 50/- or Rs. 100/-) from us by force, and they didn't give us any valid reason for taking the money from us...After I came back from my hometown in the month of January 2021, I experienced the same incident nearby the market area. Even though we showed our documents, they threatened to give us money if we didn't give the money the police used to scold and beat us. So, the only way for us to get away from them is to give them money since there is no one to help us. In the past, they took Rs. 20 to 30, but now we have to give not less than 50 rupees.

It is common to find regular checking of documents conducted by police personnel in the street of Imphal. However, this recurrent phenomenon of checking on the name of security became the cause of anxiety and insecurity for poor labour migrants because of their poor support system and negotiation capacity. The narrative of Chhotu does not merely emphasise everyday police interference and corruption that cause embarrassment and put extra financial burden; but also highlights their vulnerable position at the destination. Despite labour, migrants produced valid documents at the time of checking, but yet police personnel forcefully took money from them. The narration "... the only way for us to get away from them is to give the money since there is no one to help us..." highlights a poor social network and support system that could help them to overcome such an unwanted situation. Vigneswaran et al. (2010) have noted in their study that securitisation of migrants often hints to police authorities that labour migrants are a threat to the state and security because they are 'suspected illegal foreigners, non-citizens, irregular migrants, and refugees. This further gives impunity to police authority and personnel to exploit and extort money from migrants. Such acts of police are also often overlooked by state and vulnerable migrants because of their precarious condition (p. 479). Similarly, in the case of Chhotu, his precarious condition seems responsible to overlook police harassment, exploitation, and extortion. Santosh, a 43-year-old labour migrant, shared his experience:

I had come across many combing operations. They used to ask for my ID cards, and I used to show them my Aadhaar card, or Voter ID even though I had the ID they would ask for more documents and if I could not satisfy them then I had to give them money. The police personnel used to deliberately create problems for us to get money without any reason...

The above narrative of Santosh entails the deliberate act of police impunity to create trouble for labour migrants. A mere single document is enough to serve the purpose of police personnel if they are conducting the security check randomly for security purposes. While in the case of Santosh, asking for more and more documents seems to be a deliberate action of police authority to harass and extort some amount from labour migrants, which might cause mental and financial pressure on poor migrants. In context to migrants in Moscow, the government applied three-level measures to discourage migrants: (i) “random check of migrant’s identity documents in public places, (ii) raids at workplaces targeting undocumented migrants, and (iii) deploying police officers at points of entry and transit area such as railway station, and city’s metro system points” (Urinboyev, 2020, p. 103). Police personnel were implanting authority of these measures to disseminate fear among migrants and create an unpleasant situation for migrants, which could result in preventing the entry of migrants into the city. It seems a similar situation is also being imposed before labour migrants in Manipur. Frequent document checking, police harassment and extortion have become recurrent phenomena, which create an unwelcome situation for migrants in the city and prevent their free movement in the city. However, despite these challenges, labour migrants try to use different means and methods to negotiate and navigate such situations.

### **Labour Migrant’s Negotiation with State: Everyday Phenomena**

Labour migrants encounter various stages of negotiation and navigation in their migratory life, starting from source to destination. Fear, insecurity, and uncertainty keep haunting them from the moment they start their journey till their destination and workplace as well. Chakrabarty points out the continued surveillance of labour migrants even after their migration in the hope of better life, and fear keeps following them as they identify themselves as a trespasser (p. 236). Drawing upon our fieldwork observation, a similar situation was found where labour migrants were the subject of constant state surveillance starting from their entry to Manipur on the name of ILP and further recurrent document checking by police personnel in and around the city. Police use various tactics to keep surveillance on migrants, such as ‘racial and ethnic profiling, loitering law, petty traffic infringements, and jaywalking in a creative way’ to suspect migrants

(Vigneswaran et al., 2010, p. 479). However, amid state surveillance and insecurity, labour migrants use their own tactics in this unlawful situation. We found local dialect and language were one of the key significant tools of migrants to deal with police security checks. Drawing upon our observation, we found that at the time of police and security checks, they initiate the conversation with police in the local dialect and language—*meitei*, which often prevents their harassment and payment of a bribe. Sometimes, they tend to pay less bribes as through local dialect and language; they could negotiate better. In a similar context, Chakrabarty (2022) asserts in her study that "...learning the language is preferred by conversing with people at the destination...and this helps them [migrants] in smoother sustenance and acceptance by the local populations. One connects between proficiency, acceptance, and thereby the ease with which one makes room for a secured existence" (p. 246). Besides the local language as a tool of negotiation, labour migrants have other means to negotiate police security checks. For instance, Azad, 32 year old migrants shared his experience:

We also try to avoid the place where police frisking is being done. Our fellow migrants also used to inform each other about where the police frisking was going on...in such a situation, we shared the information among ourselves and avoided using the road in specific areas and localities where the checking was going on.

The above narrative of Azad entails solidarity and mutual cooperation as a tool for avoiding an encounter with police, thus preventing security checks. Advance information on ongoing security checks in particular locations helps labour migrants to escape from police frisking and checking, which seems a strong source of their negotiation strategy to deal with police harassment and exploitation in the name of security. The narrative of Azad strongly emphasises mutual support among labour migrants to help them escape from unwanted police surveillance. Besides police frisking and unreasonable security checks, labour migrants experience challenges getting ILP cards. Ashok a 46-year-old labour migrant, shared his experience:

We were caught by the police personnel once at the chowk. They send us back by telling us to get renew our ILP pass and other essential documents. The policemen used to give us a sheet of paper and used to tell us to make the ILP pass soon, and they will come to check again tomorrow. But we were not able to renew or get an ILP pass so we used to stay at our rooms out of fear to avoid being caught by the police.

The narrative of Ashok points out the difficulty due to ILP pass. ILP as a document became crucial for migrants to move in the city. As the narrative entails, due to the lack of ILP, they decided to stay in the room instead of going out. Police are making them discipline citizens by restricting their movement in the name of the ILP pass. The decision and conduct of being a stay at room seem influenced and governed by police personnel. However, in a few instances, they found the landlord a helping hand to assist them in getting ILP which subsequently prevent them from police harassment and extortion. Banke, a 37-year-old labour migrant, shared his experience of getting ILP:

I have a voter id card, an Aadhaar card, an ILP pass, and a Pan card. After coming to Manipur, my friend told me about the ILP pass. I submitted my form, my Aadhaar, my photograph, and Rs. 700/- to the landlord. He took all the related documents and went to the office for the application. So, he helped us to get our ILP pass. And later, I also help my friend get their ILP pass.

Though not in all cases, landlord helps their tenants, but in Manipur, it was found many participants shared about the help they received from their respective landlord, particularly in case of emergency. Landlords become the crucial person who often helps labour migrants to overcome an unwanted situation. The narrative of Bankey illustrates one such case where the landlord helps them to get an ILP card that subsequently prevents their police surveillance. Landlords negotiate and do navigation in favour of their tenants—labour migrants tend to be very significant for migrants at their destination. This could be one of the support systems for migrants at their destination. Besides, the narrative also suggests migrants' extended help and support to their fellow migrants in their time of need and getting essential documents such as ILP, which shows the notion of solidarity among labour migrants.

## **Conclusion**

We have tried to explain the recent phenomena of various documents and their significance in the life of labour migrants. Possessing certain documents enables labour migrants to be entitled to various social welfare schemes. In contrast, a lack of documents excludes them from the benefits of welfare provisions and curtails their entitlement at destination and often at the source. Possession of documents in the form of Aadhar card, voter Id, and ILP often provide them a

sense of security at destination and prevents their harassment by police personnel on various occasions. However, we have noticed it is not the labour migrants who consider documents—Id cards and ILP as an integral part of their life at their destination. But state and state agents also find it as a powerful tool to exercise its power. Labour migrants were not given entry in the territory of Manipur until they get ILP, even if somehow, they entered then there is constant threat of getting caught by police as police randomly ask them about ILP and in its absence, police personnel gets an opportunity to extort money and harass them. In context to state exercise of power over labour migrants, we are referring to what Mezzadra et al. (2013) noted: "power...is applied; it evolves, integrating and defusing resistance, absorbing revolts, unifying differences, unifying the world in its image, recovering, appropriating, even hybridising sometimes, not to lose control" (p, 23). Vulnerable poor labour migrants are not in a position to resist exploitation and police extortion in the name of security and 'document', which shows control of the state to regulate labour migration. However, amid chaotic and insecure mobility and movement, labour migrants find their ways and means to negotiate with the state in the absence of valid id proof and documents. Mutual support of migrants for each other and their landlord often becomes the most crucial tool for labour migrants to escape unnecessary and unlawful surveillance, mostly used to extort money from poor labour migrants, discipline their life, and govern their conduct of conduct.

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