

SAFETY AND HEALTH OF LABOURERS IN COTTON GINNING INDUSTRIES IN GUJARAT

A Status Paper by Prayas Centre for Labour Research and Action

This brief status paper has been prepared on the basis of accumulated experience of working for the welfare of Ginning workers since 2006 season in Kadi area of Gujarat and a study of accidents wherein researchers traced the cases of accidents in both the states of Rajasthan and Gujarat. In all 105 cases have been identified by the researchers so far, though all of them have not been approached in person and interviewed. The paper is divided into four parts. Part one provided background of the industry. Part II briefly outlines working and living conditions of workers. Part III provides an account of industrial accidents as recorded by the Prayas. Finally Part four discusses the responses of the administration and the employers and recommends appropriate measures.

I: Background

Cotton Ginning and its ancillary oil crushing solvent plants are some of the main agro-based industries in Gujarat. In fact, Gujarat has the largest number of these industries in India. While the exact number of cotton ginning factories is not available, it is noteworthy that under a GOI scheme to upgrade cotton-ginning factories, half the total number of 650 gins taken up is from Gujarat. It can be safely assumed that there are over 500 ginning factories in the state. Within Gujarat, the largest conglomerate of these is perhaps around Kadi town of Mehsana District, about 50 kms away Ahmedabad. The Directorate of Industrial Health and Safety, Gujarat, has provided a list of 122 ginning mills located around Kadi. Besides Kadi, ginning industry is spread in North, Central Gujarat, and Saurashtra regions of Gujarat.

The employment in ginning industry is seasonal – from November to April. In most cotton ginning industries, ginning is done by the mechanized raw cotton feeder machine or ‘machine charkha’—as it is called locally. About 3-4 years back, raw cotton was fed manually wherein one worker manned one feeder, while in the mechanized feeder one person manages input into 4 charkhas at a time. Similarly, at the output point, there is one person who manages 4 charkhas. At the output site cotton that spills over, has to be pushed back into the channel (‘gallery’); and one person for 4 charkhas also manages this. Besides, several labourers are employed at the bale making machines, and then for stacking and loading cotton bales onto trucks, and yet others for pilling up tractor trolleys with the by-product cottonseed. Further, supervisors, fitters and maintenance people are around. The smallest units consist of 10-12 charkhas, while the bigger units consist of 36- 40 charkhas. Thus there are 50-60 workers in a small unit and about 125-130 workers in big units, making an average of about 100 workers per unit. Thus the total workforce in ginning all over Gujarat can be estimated at over 50,000. Modernization has been possible by the technological intervention and subsidy through Cotton Corporation of India, Department of Textiles, of Government of India. Workers are also engaged in unloading raw cotton trucks, that come into Kadi from Gujarat as well as the neighbouring states.

Unfortunately, there are no accurate estimates of the number of workforce. The workers are mostly sourced through labour contractors, who procure a lump sum or a commission based on the nos. of labour he procures. The worker knows little of the details of the deals between the owner and the contractor. Majority of the workers are never shown on rolls of the factory. There are small time contractors who bring in 15-30 workers while some large ones bring in 100-200 workers. Several mates especially from nearby Rajasthan, leave their workers behind at the factory, and return sometimes mid-season or end of the season or incase there is any major problem. The senior labourers keep watch over the juniors in the absence of main contractors.

It is interesting to note that the specialized tasks, as operating charkhas, bale making etc., are performed by contract labour from specific social/ethnic/regional groups herein. On the charkhas, mainly large proportion of migrant tribal workforce from south Rajasthan is employed, besides some local population of the *dalit* (Scheduled Castes) OBC, and minority communities. The majority of the tribal migrants are adolescent and even child labour, and they are housed in shelters within the factory campus. Once the supply of raw cotton picks up the worker/mate contractors bring in the migrant labourers from Rajasthan. Until then, the local labourers are employed. Once the migrant labourers come, the local labourers are relieved, as the migrant labour is cheaper and can be controlled better, as they live on the campus. Females comprise a large proportion of the workforce, as they are cheaper. Unloading workers are from Bihar and bale packing workers from Marwar in Rajasthan.

Prayas Centre For Labour Studies And Action

Prayas Centre began working in Gujarat in the year 2006 when it started work with seasonal tribal migrants from South Rajasthan who come to Gujarat. The current initiative focuses on organising workers in the unorganised sector many of them migrant labour from Rajasthan, Madhya Pradesh, Chattisgarh, and Uttar Pradesh while it has also included working with the local workers mainly in cotton ginning mills, and construction work. It's philosophy and approach is to create a supportive environment for setting up and strengthening workers' organizations/Unions. **Dakshini Rajasthan Majdoor Union, is the Union promoted by Prayas in South Rajasthan. Similarly, the Gujarat Ginning and Other Mill Workers Union** is another union which is working with ginning workers in Kadi area from last two years. Further a union has been formed for brick kiln workers and one general union called Majoor Adhikar Manch to be able to address the issues of all kinds of unorganized sector labourers.

Besides, having acquired credibility amongst the Government bureaucracy that deals with labour issues in both the states of Gujarat and Rajasthan, it has given memorandum on key issues related to workers' welfare. Prayas Centre has organized public hearings, seminars and symposium with active support of the State and Central Government and statutory bodies, and multi stakeholder participation on the issues of child labour in Bt Cottonseed farms, cotton ginning factories and other sectors of work in Gujarat and Rajasthan, and on the issues of brick kiln workers.

The Gujarat Ginning and other Mill Workers Union started work with the tribal labour who migrated from Rajasthan in the ginning and oil mills of Gujarat mainly around Kadi, and included a large nos. of Child and adolescent labour. Later, it expanded to include the local labourers who also faced similar issues in the cotton ginning factories related to working hours, work conditions payment of minimum wages, accidents and workmen's compensation. In its work over the years, the Union encountered cases of accidents causing disability to many workers most of whom are adolescents. It has tried to research into the causes, and issues related to such accidents and documented over several case studies.

II: Working and Living Conditions

Workers work under very difficult conditions and for long hours. The major problems related to work and living are as follows.

Overworked Labour Force: All workers, whether migrant or local, do 12 hours shifts. The typical gin factory in its full capacity runs 2 shifts of 12 hours each (Day Shift—8 am to 8 pm ; Night Shift-- 8pm to 8 am), most of the ginning season. All workers do the day and night shifts as may be allotted to them, but mostly the local workers do the day shift while migrants do night shifts. At times, the migrant workers

living in the factory shelter, are summoned to do double shifts in case of labour shortage. Although the work seems unskilled, in most parts, working on the ginning machines, calls for high alertness of the worker, which many times falters due to long work hours, illness and lack of sleep, or even due to newness of tasks and/or acclimatizing to it in case of a new worker, or the new ginning season, year after year.

Unprotected working conditions leading to very high morbidity: Workers have to operate under extremely unprotected conditions where the ginning process generates miniscule fibres. Inhaling of cotton fibres leads to the serious disease of ***Byssinosis***. Therefore use of respirators is recommended. However, in none of the factory any masks are provided to workers. Workers start falling sick soon after they start working. Morbidity is very high, especially in initial days, until workers get acclimatized. The workers repeatedly suffer from respiratory diseases and skin related diseases, as the Gujarat Ginning and other mill Workers Union Found out from local doctors. At times, unskilled and untrained or un-oriented workers are expected to do risky tasks like oiling machines, or shifting large pieces of machinery, or cleaning up machines jammed up with cotton balls. It has been noticed that there is blatant flouting of statutory safety norms and facilities.

Unofficial worker muster rolls: Almost all labour at these factories is never registered officially as full/parttime workers or even contractual labourers. All lists and accounts of payments are maintained as rough registers and never make it to the official accounting systems as such. These are doctored with help of special accountants such that most of the actual workers never figure with their original name and address. Thus the existence of the actual nos. and names of labour that work or worked at the factories can hardly be ascertained or confirmed. Migrant labourers too, are not correctly accounted for, and some times officers of the of the Government overlook or collude with the factory owners and managers, so that the nos. and names a large mass of actual workers, is rendered invisible.

High incidence of child labour: A high proportion of workforce (around 40 percent) comprises of adolescent workers, and even child labour, who are of course never allowed to be visible. Employment of adolescents in a factory environment in 12 hour shifts is a serious violation of human rights.

Provision for leave and holidays: There is no provision of leave in this work. The gin at peak season runs 24 x 7, and workers are employed on daily wage basis, workers are marked absent whenever they don't show up. This is the case with both the local workers as well as the migrants, who stay on campus. In fact the common complaint of the gin owner in favour of the migrant is that the local labour absent himself or herself as and when they like leading to mismanagement in operation of gin machines. However they do not reveal that they have not adopted any regular leave system even as labourers are expected to put in 12 hours of hard labour all through the season. Thus there is no concept of casual, sick, paid or any other traditional leave granted to the labour.

Wage Matters –The contracted labour is brought in by the labour contractor, popularly known as Met who in case of the tribal migrants and most local labour is generally one of them. He may or may not pay and advance sum, which is mostly small amounts only. Wages are settled every 15 days and if the contractor has forwarded any advance in between he deducts the same when the supervisor is settling wages every fortnight. Before the last season the earned wage rate for the charkha operators was about Rs. 60/- while even after the updated wage of Rs. 115/-, for eight hours work, they have been paid only Rs. 80/- until today. The Union so far has been able to file only one case of minimum wage as the contractors and workers fear retrenchment. The actual wage is thus roughly one-third of the official minimum wage.

Living Conditions

Unhygienic living conditions: The migrant workers live on campus for the whole season of 5-6 months, while the labour contractor or the gin owners from the factory in tractors or trucks cart the local labourers to and fro from their respective nearby villages. The living conditions in the shelter sheds are highly unhygienic. There are almost 15-20 workers cramped in small rooms of 100 square fit. There are no toilet facilities made available to workers either while at work or at the living quarters, in most of the ginning factories. The entire workers share a single water tap to wash and bathe that is in the open, with no privacy for female workers. Workers live in crowded living quarters, lacking basic hygiene, with poor lighting. Besides, inhaling of cotton dust leads to a very high morbidity rate. Workers keep falling sick daily.

Lack of any Allowances/Benefits to the workers: Besides the wages, no other allowances for overtime, illnesses etc are paid to the workers. The migrant workers are given cramped housing and fuel wood to cook food whose costs the owner pays for. However, in case of illness no support is given. It is the contractor who manages such crisis and deducts costs directly from the worker. The local workers are carted to and fro at the cost of the gin owners, as long as they are employed, in autorickshaws, vans etc. Many a times a local transport owner is also a contractor or supervisor and arranges for the labour and their transport.

III: Accidents in Ginning Industries

Occupational health is a major concern in the Ginning Industries. Due to the atmosphere in the gins full of micro cotton fibres, long work hours, sometimes double shifts, and the general poverty of these tribal communities there are various types of safety issues including safety of life. Respiratory tract infections and illnesses caused by exhaustion predominate, besides malaria and other water borne diseases are quite common. We have in the recent past have recorded 105 cases, list of which is being circulated along with this note. This listing is only partial as for instance, only half the villages around Kadi – accounting for some 10 percent of the total labour force - have been covered fully in this list. A quick analysis of the recorded cases is related below.

We have information about 62 victims regarding year of accident. The Majority of the reported cases are for the last four years. In one case reported year is 1999 and four cases for 2003 and 2004. The victims are more among males than females. The males are about 55 percent and females about 45%.

The victims are from across the states (Table 1). The majority are from the state of Gujarat (54.3%) and Rajasthan (41%). The two states together account for almost 95 percent. There are cases from UP, Bihar, Maharashtra and PM as well. Table 2 suggests that out of 82 workers whose information is available to us about the age, almost half are up to 18 hears of age. Most importantly 11 percent victims are child labourers as per the labour law, Child Labour (P&R) Act 1986. There are also workers who are over 0 years of age.

Table:1: Distribution by State of Workers

State	Frequen cy	Percent	Cum. Per.
RAJASTHAN	43	41.0	41.0
GUJARAT	57	54.3	95.2
UP	1	1.0	96.2
BIHAR	2	1.9	98.1
MAHARASH	1	1.0	99.0
TRA			
MP	1	1.0	100.0
Total	105	100.0	

Table:2: Distribution of victims by AGE

Age	Frequ ency	Valid Percent	Cumulative Percent
1	2	3	4
12 to 14	9	11.0	11.0
15 to18	30	36.6	47.6
19 to 25	23	28.0	75.6
29 to 35	10	12.2	87.8
36 to 55	8	9.8	97.6
61 to 65	2	2.4	100.0
Total	82	100.0	

Fatal Accidents: The duration of working shift in all the mills is 12 hours. Although unskilled, work on the gins requires speed and alertness that is very much adversely affected by excessively long work hours, lack of adequate rest and leave. Further no appropriate apparels for workers and absence of safety devises for the them, and at times even for the factory premises, sets the stage for accidents. This is a perfect

Table:3: Distribution of victims by Nature of Injury

Nat of Injury	Frequency	Valid Percent	Cumulative Percent
Loss of Limbs (other than fingers)	48	46.6	46.6
DEATH	17	16.5	63.1
FINGER crushing and cut		21.4	84.5
BURNS	11	10.7	95.1
HEAD INJ	3	2.9	98.1
MISSING	2	1.9	100.0
Total	103	100.0	

recipe for fatal accidents keeping in mind the profile of the workforce. No wonder therefore that the out of total cases recorded we find almost 17 percent are fatal cases (Table 3). In fact, we recorded as many as five incidents of death of ginning workers in Kadi town in the year 2006-07 season. Most of the deaths are caused by gross negligence and flouting of safety norms by the employers. This is well illustrated by the fact that half of these deaths have been caused by asphyxiation in tractor trolley that collects cottonseed after ginning. In two cases the accident happened in night and in the third case the worker was doing double shift.

Other serious accidents: When serious accidents do not result in death, they certainly cause the workers serious injuries as loss of limbs/fingers, burns; resulting in physical disability of more or less degree, and more often than not rendering the young wage earner incapable of working to earn a living (Table 3). Most of near fatal accidents involve orthopaedic and head injuries. Amputation of limbs, fractures, cutting of fingers, is very common. The Union has put together a list of 88 such cases so far. This is given in the Annexure. Nevertheless it gives an idea of the types of risk workers are subject to. The list has been updated now and should be more comprehensive.

Compensation is rare: Only eight victims reported that they got compensation ranging room rupees 10,000 to 1,75,000. Actually even cost of treatment is not met by the employers in majority of the cases.

Incidents of Sexual Exploitation: Sexual exploitation of female workforce becomes a distinct possibility in the typical work environment in ginning mills – tribal adolescent girls, confined living space, and absolute control of employers over the workforce. This results in trauma and physical hardship for the victim and causes a lot of trouble for the families dealing with the incident. The Union has come across two cases of sexual exploitation of female workers. This is very common and most local workers complain that this is one region why migrant workers are preferred over them. Cases of all female groups, the Union has found difficult to access.

Case 1: Attempt to Rape

Pramila Vadi, a tribal girl from District Dungarpur in Rajasthan, was working in Neminath cotton ginning mill in Muli taluka of Surendranagar district was repeatedly propositioned by the manager of the factory. He made an attempt to rape her one night. Following this, Pramila had to run away from the factory. She had to sell her nose ring to be able to reach back home safely.

Case 2: Sexual Assault Leading to death

Shobha, a tribal girl from District Dungarpur in Rajasthan had gone to work in Som Nath Cotton Industries of Amreli district. Her body was brought back to the village on 2nd February 2007. While reportedly a post mortem has been carried out, the report is not available. It has been revealed by the co workers who have come back that Shobha died an unnatural death. She was taken out of the factory premises by the owner's son and subsequently her body brought back.

IV: State and Employers Responses and Conclusions

Status of Statutory and Legal Requirements and Implementation.

As far as the legal status goes, all the basic laws for casual and contractual labour apply to the ginning factories. Further the Factories Act, the Workmen's Compensation Act, the Interstate Migrant Worker's Act, and the Prohibition and Regulation of Child Labour Act are relevant and can be effectively used to yoke in the gin owners to ensure safety, security and payment of minimum wages, if these laws are implemented properly.

- Under the Factories Act, the owner can be booked for not maintaining proper worker's records, proper wage records, insisting women working in night shifts and doing difficult tasks, not ensuring safety procedures and equipment, and basic amenities for factory as well as workers, and not reporting worker accidents and deaths at work, as well as taking 12 hour duty without overtime wages, and not allowing regular leave, etc.
- Under Child Labour Act, the owner can be booked for employing children under 14 years;
- Under the regulation and prohibition of contract labour Act, the owner as well as the contractors can be booked for non-registration as such, etc.
- Minimum wages as per the scheduled lists is never paid and the factory owner can be prosecuted, under the Payment of Wages as well Minimum Wages Act, etc.

It may be noted, that The non compliance of statutory requirements by the gin owner of all the above and many such other provisions, , leads one way or the other, directly or indirectly, to adverse health, safety and security situations, causing illnesses, accidents and deaths.

Response of Ginning Factory Owners

Primary responsibility of implementation of all the safety related norms that are stipulated in the Factories Act is that of employers. However, it is evident that most of these are not observed as required. Further as the workers are on 'invisible rolls' they are neither insured nor protected under any social security. When

any worker meets with an accident and is injured, s/he is provided treatment at any local hospital. Every Gin owner has contracted one or another local doctor, mostly an orthopedic, who treats accident cases for him. He mostly colludes to hide/cover up the medical records. Most doctors refused to co-operate for a medical camp and admonished the union leaders who approached them as being anti gin owner, although not a single case of flouting the law has been won in favour of the worker so far. Mostly the medical treatment given by these facilities is confined to amputation, healing wounds, and preventing infection. No attention is paid to the physical and mental trauma of the victim, or to physical therapy or follow-up. There is no question of any other rehabilitation.

The victim mostly loses his/her job and is sent back home as early as possible, without any record of treatment, or medical or disability certificate regarding physical injury etc. The medical history and treatment file is almost always confiscated by the gin owner, in tandem with the doctor, who also avoids giving any proper proof on paper. No follow-up/rehabilitative surgery is ever undertaken by the owner. On the contrary, when the relatives /parents of the victim try to negotiate with the factory owners for follow-up treatment or compensation, some are generally dismissed after some miniscule compensatory amount that hardly pays for the follow-up treatment, but many are even threatened to leave the place. At times the owner gives a false promise of compensation quoting some vague insurance policy that is supposed to mature in future, and takes away all medical records. The Union knows of no case where appropriate insurance was given. Even when a labourer falls ill, the owner takes no responsibility.

Response of Labour Contractor

Migrant labourers are invariably recruited by mates/contractors/mukaddams. The mates from Rajasthan have themselves been labourers and overtime have become small time contractors bringing in 15-30 labourers at one gin mostly. A few are bigger and bring in upto 200. The Gujarat mates mostly bring labourers from their own or neighbouring villages. They earn a commission of Rs 5-15 per labourer. They are responsible for ensuring the work output and wellbeing of the workers as they live on factory sites. They also settle all accounts with the gin owners on workers behalf, and take the workers to doctors when they are unwell. However, they are also as powerless as the workers when negotiating with the gin owners for compensation related to accidents and death at work of the workers. Some of them do mediate, but due to their own powerlessness and self-interest they generally never end up supporting the labourer whom they accompanied to the gin. Most of the mates actually escape away and generally avoid playing the mediation role.

Response of the State- Union's Experiences

Labour Department

As is usually the case, the response of the Labour Department has been mixed. Some officers co-operate, respect the union and proceed to at least initiate the legal procedures. Others just don't care. Infact one experience relates to the beating up of a labourer who complained, in the office premises of the labour inspector, and regular threats to union workers. Labour Department's response to the above issues at joint meetings is positive, while in the field it is rather weak, to say the least, to the reported cases as well as to general conditions of labour in the factories. It gives a feeling that the labour department tends to be biased in favour of employers as labour involved is mostly inter-state migrants. Further, in the absence of evidences due to wide spread practice of recruiting 'benami mazdoors' the labour department fails to prosecute the offender employers.

The process of enquiry under Factories Act is very complicated and the Dept insists on concrete evidences. It also stops at serving notices and extracting penalties that are quite meager. But the same Dept. fails to notice lack of proper worker records that don't match with the actual workers who visibly

live and work in the factories. In fact the owner's lawyers prepare all the paper work, and face the Dept., and the owner is hardly inconvenienced. These lawyers also intervene in out of court settlements with accident cases and underplay accidents as worker's bad luck or owner's graciousness for providing treatment, or a blessing in disguise for not being worse than it was!!

Mostly workers when confronted reveal nothing out of fear of loss of livelihood, making it easy for the owner to go scot free. Union notified 6 cases of accidents in which the Factory Inspector has started investigations. Out of these, the department responded in three cases. In two cases of death, report was prepared. In one case, several workers returned to their villages and are fearful of coming back. They lack records and also resources to face a lengthy and expensive legal process.

Workmen's Compensation Act has to be filed by the affected worker, whose powerless situation makes him fearful to approach any state apparatus, without any backing or records.

Police Department

The Union has taken recourse to reporting the accidents cases at the police station which files a 'Panchnama' for record purpose. It has taken a while before the Police started to take cognizance on insistence of the Union. But the police insist on presenting some medical records even for such reports, and that as mentioned above, are very difficult to procure. Of course no case of criminal negligence has been filed since Prayas' work.

Health Department

As the gin owner only uses private medical facilities, the government's role does not arise, and no record of injuries or accidents is maintained by Government. There is no knowledge of whether the Public Health Dept, even visits the factory campus to ensure safe drinking water and sanitation, or educates the local workers on health and safety issues. Most local accident cases resulting in disability, have not even procured disability certificates several years after the accident, to avail benefits due under the law. No disability identification camps have been noted during last three years since the Prayas Centre's work. There are no government checks on the private hospitals to compulsorily involve or inform the government health Dept.

Social Welfare Department

Like Health Department, the social welfare Dept. also seems to be hardly aware of the severity of the situation of disability in the areas around the ginning factories; and no special efforts have been noticed in identification of the disabled, as well as in providing benefits to them in the last three years, since the union has started its work

In final analysis, as the situation exists today, state response is neither helping in getting justice to the victims nor is it helping in improving the situation proactively. The State response thus leaves much to be desired in terms of both curative measures as well as protective aspects.

Conclusion

➤ It is clear that as safety norms are observed in the negative, the risk and/or actual incidence of accidents and resultant injuries are very high. As the large nos. of workers herein is adolescents, they form the largest amount of affected persons (victims). Many are first time workers too.

- Most of these young labourers injure their limbs, mainly the working arm/hand or leg and are rendered partly or fully disabled as far as productive work and earning ability goes. Also, as young and unmarried, most of them are psychologically affected due to disfiguration, fearing social rejection and isolation and many draw into a psychological shell. Many have contemplated suicides.
- As the owner mostly shirks responsibility or openly threatens, while the mate/contractor is helpless, the fearful family retreats, and is unduly burdened with managing the follow-up treatment as well as the psychological trauma of their wards without any compensation from either the owners or the government. Many have borrowed heavily, hoping to provide appropriate treatment to their family members, rendering them into heavy indebtedness and poverty. This leads to spiraling of adversities on the existence of the entire family of the victim.
- Almost all owners maintain no formal records of the contractual labourers, nor do they insure them. They confiscate personal medical and treatment record files related to injuries. Thus there is almost no way to seek legal redress. Infact, it gets almost impossible to even lodge a complaint, with the police or the labour department's official concerned with Industrial Health and Safety.
- Several accidents occur as unskilled/unoriented workers are set up for tasks they have never handled. Or it is sheer criminal negligence when electric wires hang loose in and around the operating machines, leading to electric shocks and fires, which spread fast.
- The information collected from one zonal office of Industrial Health and Safety, very few inspections have been filed against gin owners.
- Employment of adolescents in 12 hour night shift is only a violation of basic safety norm, but of basic human right, and needs to be booked under culpable homicide, but that has never happened.

All these rather obvious issues are critical. Yet they are strangely invisible, or are interpreted in a casual manner as stray accidents that after treatment have no further significance except as unpleasant incidences to be forgotten by gin owners, co-workers and society. However, for the affected victim and her/his family, it is the beginning of a traumatic existence and life conditions, which become confined within the four walls of the household and the recesses of a depressed mind.

Objective of Public Hearing

It is clear that although a very common occurrence, accidents are hushed up almost as soon as they occur, and the victim returns home, without any clue as to what relief, rehabilitation and legal remedy s/he can procure and from where. The government does its very little bit, quoting lack of evidence and records. Thus this reality and the heavy social and economic cost to society is undermined and well nigh relegated into invisibility.

The present Public Hearing has been organised to

- To bring visibility to the issue of industrial accidents in the ginning factories and highlight various issues related to these industrial accidents
- To highlight the non-implementation of provisions of various laws related to safety and compensation
- To ensure quick remedial measures through public action and state accountability and suggest ways to bring about comprehensive relief to the victims and/or their families.
- To develop a strategy to address these concerns proactively in future.