

Chapter 4
Registration of Establishments
and Workers

4 Registration of Establishments and Workers

The BOCW Act mandates every employer to get his/her establishment registered and to report to the Board regarding the commencement and completion dates of the work, availability of health and safety facilities at the workplace, periodicity of payment of wages *etc.* Commencement of work, without submitting such a report to the Board, is liable to attract penalty. In addition, workers engaged in construction activities are entitled to benefits under the various welfare schemes, framed by the Board. A worker can avail welfare facilities only when he/she is registered as a beneficiary of the Fund.

Audit scrutiny of records revealed shortcomings in the registration of establishments and workers, as discussed in the succeeding paragraphs.

4.1 Registration of establishments and workers

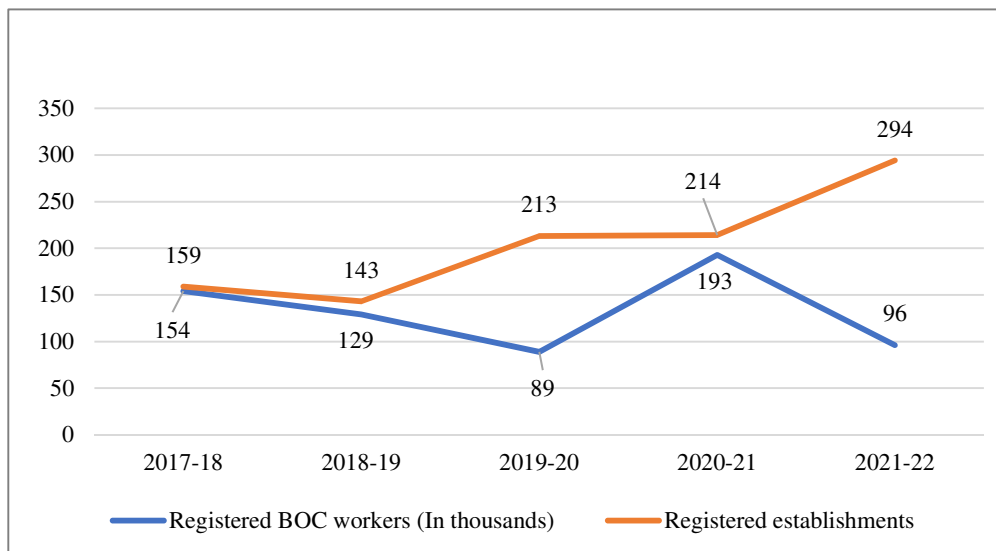
Section 7 of the BOCW Act stipulates that every employer, undertaking construction work, should make an application to the Registering Officer, for registration of the concerned establishment, within 60 days from the commencement of the work. Further, as per Section 12, every building worker, who has completed 18 years of age, but has not completed 60 years, and has been engaged in any building or other construction work, for not less than ninety days during the preceding twelve months, is eligible for registration as a beneficiary, under the Act.

Construction activity in the State is undertaken by the departments of the State Government, State and Central PSUs, Autonomous Bodies and Local Bodies. In addition, the plans for construction of private and government buildings are approved by the plan approving authorities²¹ of the local government and the department concerned respectively.

The trends in regard to new registrations of establishments, *vis-à-vis* newly registered building workers, during FYs 2017-18 to 2021-22, are depicted in **Chart 4.1**.

²¹ Regional Development Authorities and Municipal Corporations.

Chart 4.1: Registration of new establishments and workers, during FYs 2017-18 to 2021-22



(Source: Data provided by JAP-IT and the district offices)

It can be seen from **Chart 4.1** that the number of newly registered workers had actually gone down with the increase in the number of newly registered establishments during FYs 2017-18 to 2021-22. This can be attributed to non-identification of workers by the Board, after taking into account construction activities being carried out in the State, and lack of co-ordination between the Board and the administrative departments, as well as plan approving authorities.

During joint physical verification along with the representatives of the Board, it was noticed that, out of 220 workers surveyed at 24 construction sites/establishments (eight registered and 16 non-registered), only 34 workers were registered with the Board, as discussed in **Paragraph 6.1**.

Audit further noticed, in four²² test-checked districts, that the Building Construction Divisions (BCD) and the Road Construction Divisions (RCD) had executed 1,869 works²³. However, the divisions had not shared information of the establishments with the Board, as required under MWS&AP (discussed in **Paragraph 2.5**). The contractors (employers) also had not ensured registration of their establishments after commencement of works, though stipulated under the BOCW Act. Further, the Board also failed to obtain related information, from the concerned divisions, though the divisions were realising labour cess, at source, under the directions of the Board. Moreover, the Inspecting Authorities of the Board also did not inspect these works, to assess their commencement and to get the establishments and the workers engaged thereon, registered under the Act.

²² Bokaro, Dhanbad, East Singhbhum and Ranchi

²³ RCD: 151 works and BCD: 1,718 works

Thus, the Board failed to ensure registration of building and other construction works as establishments and identify and register workers engaged in these works for providing welfare benefits under the BOCW Act.

Recommendation 5: State Government may fix responsibility on the officials of Government Departments/PSUs/Local Bodies, who have not shared information of employers with the Board. The State Government may also consider inserting a clause in the bidding documents, relating to all construction works to be undertaken by the State Government/State PSUs/Autonomous Bodies, for ensuring mandatory registration of establishments under the BOCW Act.

4.2 Delays in the registration of establishments

As per Rule 24 of the Jharkhand Rules, the registering officer, after receiving an application for registration of an establishment, is required to register the establishment and issue a Certificate of Registration (CoR), to the applicant, within fifteen days of receipt of the application.

In the State, 1,023 establishments had been registered, during FYs 2017-18 to 2021-22. Of these, in 412 cases (40 *per cent*), CoRs had been issued after the prescribed period of 15 days, as shown in **Table 4.1**.

Table 4.1: Delays in issuing CoRs

Financial Year	Total registrations	Registrations involving delays	Delays (<i>per cent</i> of total registrations)				
			More than two years	One to two years	90 days to 180 days	30 to 90 days	16 to 30 days
2017-18	159	69	0	2	21	22	24
2018-19	143	85	4	4	14	28	35
2019-20	213	89	4	5	14	25	41
2020-21	214	81	9	7	22	21	22
2021-22	294	88	11	4	30	20	23
Total	1,023	412	28 (3)	22 (2)	101 (10)	116 (11)	145 (14)

(Source: Data provided by the Board)

It can be seen from **Table 4.1** that there were delays of more than 90 days, in issuance of CoRs, in 15 *per cent* cases (including five *per cent* cases, where the delays were more than one year).

While accepting the facts, the Department stated (October 2023) that incorporation of mandatory provisions in the contracts/SBDs, for registration of works as establishments under BOCW Act, is under consideration. It was further stated that the Labour Superintendents of the respective districts have been directed to ensure timely disposal of applications for registrations of establishments, in addition to conducting inspections of the unregistered establishments and initiating appropriate action.

4.3 Registration of building workers

Section 2 (d) of the BOCW Act empowered the State Government to specify a work, as 'building and other construction work', for registration of workers under Section 12 of the BOCW Act.

GoJ had notified (April 2011 and November 2015) 54 categories of works (**Appendix 4.1**) as 'building or other construction work'. The Board had also decided (March 2011) to register MGNREGA workers, as building and other construction workers. Further, as per the forty-fourth Report of the Parliamentary Standing Committee on construction workers, presented (March 2014) to the Parliament, there were an estimated 16.99 lakh construction workers in Jharkhand, as of June 2013. Audit noticed deficiencies in the process of identification, registration and issue of identity cards to workers, as discussed in the following paragraphs.

4.3.1 Identification of workers for registration

To bring maximum workers under the coverage of welfare schemes under the BOCW Act, the MWS&AP directed the Board to conduct awareness campaigns and facilitate registration of workers, by holding regular camps and setting up facilitation centres at prominent labour *chowks/addas*.

Audit noticed that the Board had not conducted awareness programmes, or set up any facilitation centres, in the four test-checked districts. Audit scrutiny revealed that there were 5.96 lakh and 12.57 lakh registered workers in Jharkhand, as on 31 March 2017 and 31 March 2022, respectively, which were below the estimated figure of 16.99 lakh workers in June 2013, as per the Report of the Parliamentary Committee.

Though, the number of registered workers in the State had increased from 5.96 lakh in FY 2017-18 to 12.57 lakh in FY 2021-22, the Board had still not covered a large number of left out workers, including all MGNREGA workers and other categories of workers²⁴, who were required to be covered as beneficiaries of the Welfare Fund.

Thus, the Board had failed to conduct awareness campaigns and set up facilitation centres at prominent labour *chowks/addas*, for registration of workers, resulting in a large number of eligible construction workers remaining deprived of the benefits of the welfare schemes run by the Board.

4.3.2 Unique Identification Number and online mode of registration

The Department had directed (May 2016) all Registering Authorities in the State to register workers only in the online mode, with effect from May 2016, on the

²⁴ Watchmen, Sewerage workers, workers involved in installation and repair of fire extinguishers, installation and repair of lifts, escalators *etc.*

dedicated web portal called ‘*Shramadhan*²⁵, developed and maintained by the Jharkhand Agency for Promotion of Information Technology²⁶ (JAP-IT). Further, the MWS&AP envisages portability of welfare benefits for the workers. It provides that every State should allot a Unique Identification Number (UIN) to each construction worker and upload the complete details on the State and National web portals.

Audit, however, noticed that registration had continued in the offline mode till March 2021. Details regarding registration made under the offline and online modes, in the test-checked districts, for the period from FYs 2017-18 to 2021-22, are given in **Table 4.2**.

Table 4.2: Registration of BOC workers

Financial Year	Ranchi		Dhanbad		East Singhbhum		Bokaro		Total		
	Offline	Online	Offline	Online	Offline	Online	Offline	Online	Offline	Online	Total
2017-18	3,246	4,075	9,577	4,764	8,879	699	9,395	927	31,097	10,465	41,562
2018-19	0	7,008	6,568	5,162	12,332	967	15,180	1,399	34,080	14,536	48,616
2019-20	10,443	3,243	1,469	3,034	0	3,085	4,319	90	16,231	9,452	25,683
2020-21	11,284	3,345	0	3,626	0	3,747	0	3,192	11,284	13,910	25,194
2021-22	0	4,713	0	5,508	0	7,646	0	9,910	0	27,777	27,777
Total	24,973	22,384	17,614	22,094	21,211	16,144	28,894	15,518	92,692	76,140	1,68,832

(Source: Data provided by the District Offices and JAP-IT)

It can be seen from **Table 4.2** that, out of 1,68,832 registrations, 92,692 registrations (55 per cent) had been done in the offline mode. Further, the Board had also not provided UINs to any of the workers registered through the online or the offline modes.

Audit further noticed that, in the case of registrations done in the offline mode, the Registration Officers (ROs) had allotted block-wise registration numbers, to the workers. The Board had also computerised the data of offline registrations, for uploading on the web portal. Scrutiny of the computerised offline data, pertaining to 1.93 lakh registered workers, in the four test-checked districts, revealed that 2,374 registration numbers had been issued to only 1,306 workers. Out of these 1,306 workers, 65 workers were found to have registered in more than one block, with different registration numbers and 67 registrations involved more than one worker registered with the same *Aadhaar* number.

Thus, the Board had failed to ensure UIN to each beneficiary, through online registration, which had also led to double benefit of welfare schemes to the same beneficiaries, from different Blocks, as discussed in **Paragraph 5.5.1**.

²⁵ A dedicated portal used for online registration of establishments as well as building workers. The portal also provides information of various welfare schemes and facilitates application by the beneficiaries for availing welfare benefits under the Schemes.

²⁶ Nodal agency for propelling IT growth & implementation of IT & e-Governance projects, in the State of Jharkhand.

4.3.3 Delays in the Registration of workers

The Department of Personnel, Administrative Reforms and Rajbhasha, GoJ, issued (December 2015) a notification, under Section 4 of the *Jharkhand Rajya Sewa Dene ki Guarantee Adhinium*, 2011 (Right to Guarantee of Service Act or RTGS Act), stipulating that the Labour Superintendent would provide the service of registration, to workers, under the BOCW Act, within 30 days. Section 7 of the RTGS Act also provides that failure to provide the service, without sufficient and reasonable cause, within the stipulated time frame, shall attract a lump sum penalty of ₹ 500 to ₹ 5,000.

Further, Section 12 (5) of the BOCW Act stipulates that applicants may prefer an appeal before the Secretary of the Board, or any other person specified by the Board, within 30 days, if they are aggrieved with the decision of the Registration Officer.

Out of the 92,692 offline registrations, made during FYs 2017-18 to 2021-22, in the four test-checked districts, Audit test-checked 300 applications (75 from each of the four districts). It was seen that the dates of submission had not been mentioned on any of these applications. Further, the Registering Officers had not maintained any register, to record or acknowledge the receipt of these applications. As such, Audit could not ascertain the compliance of the RTGS Act, by the Registering Officers.

In case of the 76,140 online registrations, made in the four test-checked districts, 9,546 registrations (13 *per cent*) had been completed with delays of up to 1,356 days, beyond the prescribed 30 days, as shown in **Tables 4.3 and 4.4**.

Table 4.3: Delays in the registration of workers

Financial Year	Dhanbad		Ranchi		Bokaro		East Singhbhum		Total		
	Total registrations	Delayed registrations	Total registrations	Delayed registrations	Total registrations	Delayed registrations	Total registrations	Delayed registrations	Total registrations	Delayed registrations	Per cent of delayed registrations
2017-18	4,764	0	4,075	107	927	359	699	189	10,465	655	6
2018-19	5,162	3	7,008	471	1,399	162	967	112	14,536	748	5
2019-20	3,034	161	3,243	406	90	28	3,085	516	9,452	1,111	12
2020-21	3,626	404	3,345	339	3,192	264	3,747	1,458	13,910	2,465	18
2021-22	5,508	155	4,713	754	9,910	2,153	7,646	1,505	27,777	4,567	16
Total	22,094	723 (3%)	22,384	2,077 (9%)	15,518	2,966 (19%)	16,144	3,780 (23%)	76,140	9,546 (13%)	13

(Source: Data provided by JAP-IT)

Table 4.4: Range of delays in the registrations of workers

District	Total registrations	Registrations involving delays (percentage)	Delays (percentage)				
			More than 400 days	301 to 400 days	201 to 300 days	101 to 200 days	31 to 100 days
Bokaro	15,518	2,966 (19)	8	29	41	95	2,793
Dhanbad	22,094	723 (3)	0	0	8	33	682
East Singhbhum	16,144	3,780 (23)	81	21	84	218	3,376
Ranchi	22,384	2,077 (9)	99	192	84	128	1,574
Total	76,140	9,546 (13%)	188 (2%)	242 (3%)	217 (2%)	474 (5%)	8,425 (88%)

(Source: Data provided by JAP-IT)

It can be seen from **Tables 4.3** and **4.4** that the delays in registrations had increased over these years. Further, the delays were much higher in the East Singhbhum district, compared to other districts. It can also be seen that the registration applications of 430 workers had been approved after delays of more than 300 days.

It was further noticed that the provision of registration within 30 days, or penalty, in cases of delays, under the RTGS Act, or the provision regarding appeal against the decision of the Registering Officer, had not been publicised, for information to the stakeholders at large, to enable them to be aware of their rights, in this regard. No mention of these provisions was found available, either on the web portal *Shramadhan*, or in the pamphlets being distributed by the Board.

Thus, the Board had not ensured that all registrations were completed within the prescribed period, nor had it created awareness among workers regarding their right to get themselves registered without undue delay.

4.3.4 Registration of workers without ascertaining their age

As per Section 12 of the BOCW Act, read with Rule 276 of the Jharkhand Rules, every building worker, between the ages of 18 years to 60 years, is eligible for membership of the Welfare Fund. The workers are required to submit any one of the three prescribed documents²⁷ in support of age along with the application for registration.

Audit scrutinised the applications of 300 beneficiaries (75 from each of the four test-checked districts), who had registered offline, during FYs 2017-18 to 2021-22, and noticed the following deficiencies:

- The prescribed documents, in support of age, were not found enclosed with any of the 300 applications. Instead, copies of *Aadhaar* Cards (which were

²⁷ (i) School records (ii) Certificate from the Registrar of Births and Deaths and (iii) Certificate issued by a Medical Officer, not below the rank of Assistant Civil Surgeon or Assistant Chief Medical Officer.

not part of the prescribed list of documents for proof of age) were found enclosed with the applications. Audit also noticed that some *Aadhaar* cards indicated only the year of birth and not the exact date of birth.

- The Board, had decided (May 2016) to register building workers only in the online mode, through the web portal '*Shramadhan*'. The portal facilitates workers to apply online to register themselves, along with details of bank accounts, *Aadhaar* numbers, dates of birth, occupation *etc.*, by uploading the supporting documents. These details were to be verified with the uploaded documents and approved by the concerned Registering Officers, after which identity cards, bearing unique registration numbers, were to be generated.

Audit, however, noticed that the portal did not have any validation controls for restricting ineligible workers, who were not in the age group of 18 years to 60 years, to apply online. Analysis of online registration data in the four test-checked districts, revealed that the ages of 91 registered workers, were below 18 years, whereas the ages of 106 workers, were more than 60 years, on the dates of their registration.

Thus, the Registering Officers were carrying out registrations, without proper verification of the age-related requirements of workers.

4.3.5 Registration of workers without verifying their occupation

As per Section 12 (1) of the BOCW Act, a building worker, who has been engaged in any building and other construction work, for not less than 90 days, during the preceding 12 months, is eligible for registration under the BOCW Act. Further, Rule 276 (3) of the Jharkhand Rules provides that, in support of employment: (i) a certificate from the employer or contractor or (ii) a certificate issued by the registered Construction Workers Unions or (iii) a certificate issued by the Assistant Labour Commissioner/Deputy Labour Commissioner of the concerned area, is to be enclosed, with the application.

- Test-check of the applications of 300 registered workers, in the four test-checked districts, revealed that 'building and other construction worker' had been recorded, against the field 'occupation', on their applications. However, the bank pass books of 176 of these beneficiaries²⁸ indicated their occupation as students; housewives; and persons involved in agriculture or private business; self-employed persons *etc.* Out of these 300 beneficiaries, only 111 beneficiaries had submitted the prescribed documents in support of occupation. The remaining 189 beneficiaries had either not submitted any documents, or had submitted self-certificates regarding their occupation. During the beneficiary survey, 20 out of 400 registered workers were found to be engaged as weavers/housewives/tailors, or engaged in agriculture (**Appendix 4.2**), but had been registered as building workers.

²⁸ Ranchi: 48, Dhanbad: 54, East Singhbhum: 40 and Bokaro: 34.

- In two out of the four test-checked districts, 111 applications²⁹ were found to be supported (number of days engaged in any building and other construction work) by the certificates issued by the registered Workers Union or Employers. However, in East Singhbhum, it was seen that the front leaves of the MGNREGA job cards, from which the days of employment were not verifiable, had been enclosed with 39 applications. Further, in Ranchi and Bokaro, all 150 applications were supported by self-certificates of employment, without mentioning even the name of the work. Moreover, in 16 applications of Ranchi, the workers had themselves declared that they had done work for only 67 to 89 days, which was less than the 90 days required for registration.

Thus, the likelihood of registration and extension of benefits to ineligible workers, could not be ruled out, as workers had been registered without ensuring that they met the prescribed conditions regarding occupation or the number of days of employment.

4.3.6 Incomplete credentials for Registration for Direct Benefit Transfer (DBT)

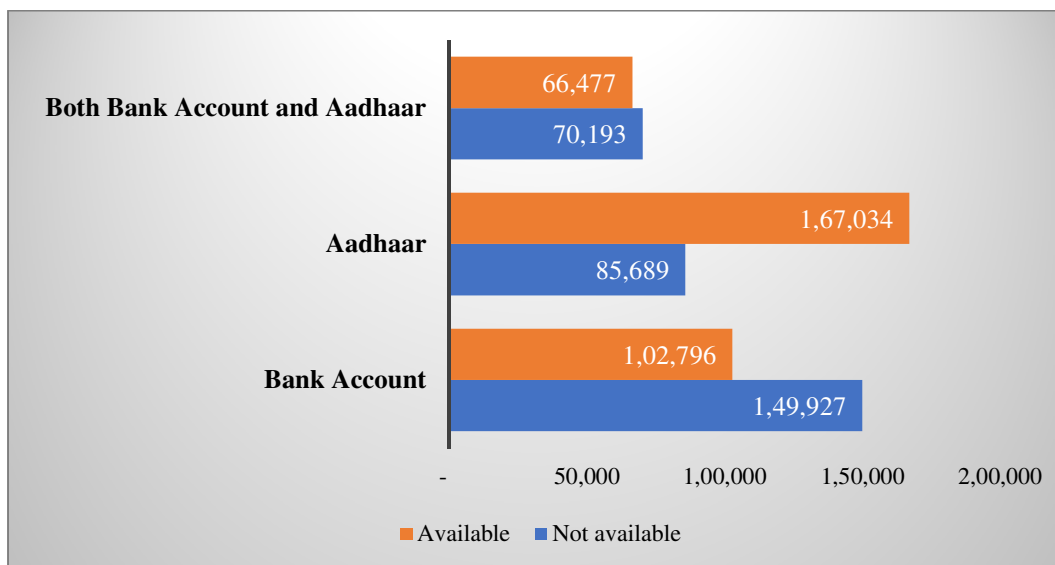
The Department decided (April 2016) to provide all benefits of schemes, implemented by the Board, through DBT. The Board, accordingly, directed (May 2016) all Assistant Labour Commissioners and Labour Superintendents, to update the details of the beneficiaries, with their *Aadhaar* numbers and Bank Accounts in the database maintained by the Board, so that DBT could be rolled out.

Audit, however, noticed that the Board was not providing benefits in the DBT mode (as of December 2022). Instead, assistance under various schemes (except distribution of *sarees* and cloth for shirt and pants) was being provided by transferring the amounts directly into the Bank Accounts of the beneficiaries, through NEFT (National Electronic Fund Transfer), as of March 2022.

Audit analysed the computerised data of 2,52,723 beneficiaries, who had been registered in the offline mode, in the State, up to 31 March 2022, to ascertain availability of their *Aadhaar* number and bank account. Findings are summarised in **Chart 4.2**.

²⁹ Dhanbad: 75 and East Singhbhum: 36.

Chart 4.2: Status of availability of Aadhaar and bank account of the beneficiaries



(Source: Data provided by the Board)

It can be seen from **Chart 4.2** that both *Aadhaar* numbers and bank accounts were available only for 66,477 (26 per cent) beneficiaries. *Aadhaar* details were not available for 85,689 beneficiaries (34 per cent), bank details were not available for 1,49,927 beneficiaries (59 per cent) and bank details and *Aadhaar* details were not available for 70,193 beneficiaries (28 per cent).

In the absence of bank account details, 59 per cent of beneficiaries were not being provided benefits even through NEFT. In addition, the Board had failed to update both the *Aadhaar* and bank account details of 74 per cent of the beneficiaries, even though these details were necessary for providing benefits in the DBT mode.

Recommendation 6: The Board may expedite integration of the offline database in the web portal incorporating all credentials, including *Aadhaar* number and bank accounts mapped with *Aadhaar*.

4.3.7 Discrepancies in the reported number of registered workers

As per Section 14 (1), of the BOCW Act, a building worker, who has been registered as a beneficiary under the BOCW Act, shall cease to be as such, when he attains the age of sixty years, or when he is not engaged in building or other construction work, for not less than ninety days in a year. Further, Section 57 of the BOCW Act stipulates that, the Board is to furnish, from time to time, to the Central Government and to the State Government, such returns, as they may require.

The field offices of the Board were required to submit monthly returns of registered workers, to the Board. After compilation of the data, the Board was required to submit reports to the Monitoring Committee of GoI, on a quarterly

basis. As per the reports submitted by the Board, there were 12.57 lakh registered workers in the State, as of March 2022.

Audit scrutiny revealed that the Board, since its inception in July 2008, had paid death assistance benefits, in respect of 3,589 registered workers, up to March 2022. Further, in the four test-checked districts, there were 10,710 registered workers, who had attained the age of 60 years, during FYs 2017-18 to 2021-22. However, both the above-mentioned categories of workers had been considered as registered workers, in the reports of the Board.

Thus, the Board had failed to review the registration details of workers, whose memberships were liable to cease, under the provisions of the BOCW Act.

While accepting the facts, the Department stated (October 2023) that directions have been issued to all Labour Superintendents of the districts, to coordinate with the agencies empanelled under Municipal Corporations and the offices of the Information and Public Relations Department, for display of boards/hoardings *etc.* at prominent places with concentration of workers/large construction sites, *Chowk/Adda etc.*, advertising the schemes of the Board. It was further stated that the Secretary, BOCW Board, had also issued directions to the Registration Officers for timely disposal of applications for registration after ensuring that the required eligibility, prescribed under Section 12 of the Act, are met. Presently, registrations are being carried out only through online mode for which *Aadhaar* and Bank Account numbers are mandatory. Instructions have also been issued for updation of *Aadhaar* and Bank Account numbers for registrations which had been made through offline mode earlier. Further, all Labour Superintendents of the districts have been instructed to provide information of active/inactive workers, who have completed the age of 60, and workers who have received death benefits, since the Board's inception. The compiled data would be placed before the SAC and the Board for taking appropriate decisions on the status of their registration.

Recommendation 7: The database of the web portal may be periodically updated, in respect of registered workers who have attained pensionable age, died or had ceased to remain BOC workers.

4.4 Non-payment of contribution

Section 16 (1) of the BOCW Act envisages payment of contribution, by a registered beneficiary, as may be specified by the State Government. Further, Section 17 of the BOCW Act stipulates that, non-payment of contribution, for a continuous period of one year, would lead to cessation as a beneficiary, until the beneficiary is restored by the Secretary of the Board, after being satisfied that the non-payment of contribution was for a reasonable ground, and the worker was ready to pay the arrears. The State Government had notified (September 2011) that every registered beneficiary was required to contribute to the Welfare Fund, at the rate of ₹ 100 annually, or ₹ 50 half-yearly.

Audit noticed that a large number of registered workers, in the test-checked districts, were not paying annual contribution regularly, as shown in **Table 4.5**.

Table 4.5: Status of contribution

Financial Year	Details of workers paying contribution									
	Ranchi		Dhanbad		Bokaro		East Singhbhum		Total	
	Number of workers liable to pay	Number of workers who paid	Number of workers liable to pay	Number of workers who paid	Number of workers liable to pay	Number of workers who paid	Number of workers liable to pay	Number of workers who paid	Number of workers liable to pay	Number of workers who paid (per cent)
2017-18	21,581	1,012	42,458	16,750	45,406	2,220	42,585	3,699	1,52,030	23,681 (16%)
2018-19	28,902	314	56,817	24,136	55,563	9,536	53,329	2,173	1,94,611	36,159 (19%)
2019-20	34,955	1,950	68,582	2,251	70,958	285	68,109	3,032	2,42,604	7,518 (3%)
2020-21	48,641	5,913	74,391	0	75,353	1,471	70,587	4,283	2,68,972	11,667 (4%)
2021-22	63,270	5,116	74,391	4,386	78,492	1,357	73,587	544	2,89,740	11,403 (4%)

(Source: Information provided by district offices)

It can be seen from **Table 4.5** that only three to 19 per cent of workers had paid their annual contributions during FYs 2017-18 to 2021-22. Despite a significant decrease in the number of paid members over the years, neither the Board, nor the field offices, had taken steps to encourage workers to contribute regularly to the Welfare Fund.

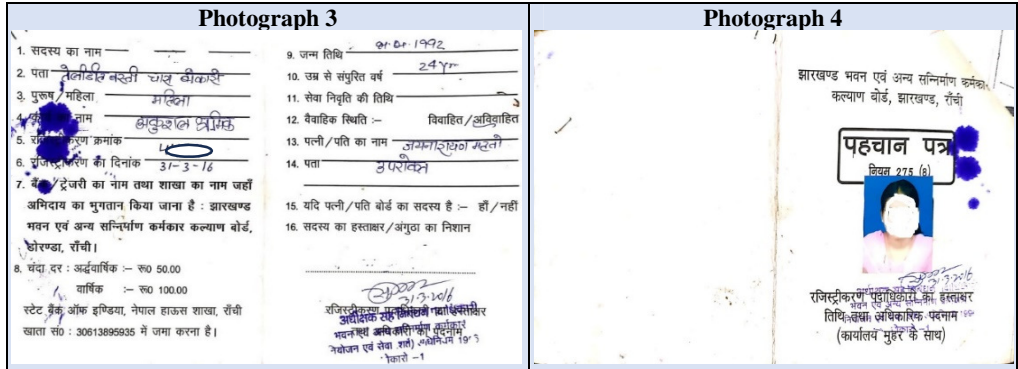
The Department did not submit specific replies to the audit observation.

4.5 Non-Issue of identity cards in consonance with the provisions of the Act

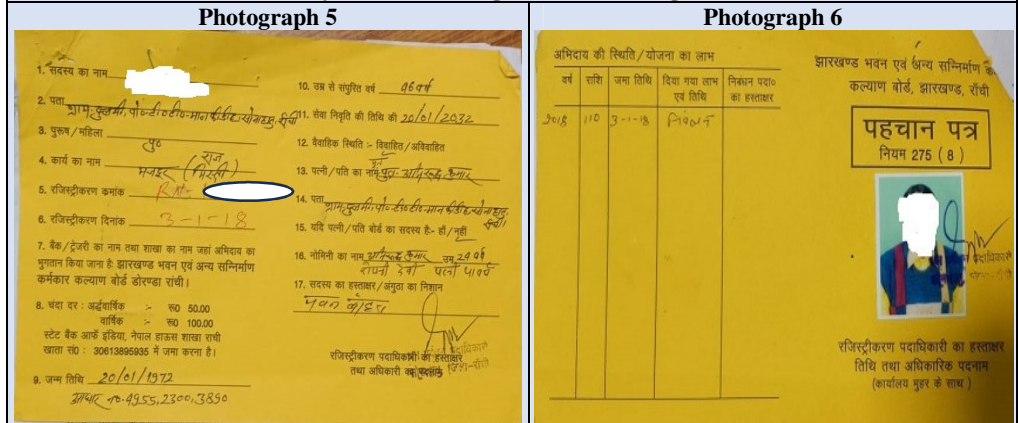
As per Section 13 of the BOCW Act, the Board was to give every beneficiary an identity card, with his/her photograph duly affixed thereon, and with enough space for entering the details of the building and other construction work done by him/her. Every employer was required to enter, in the identity card, the details of works done by the beneficiary and to authenticate the same. The MWS&AP also stipulated that the registering authorities were to provide identity cards, in a form of a passbook or employment diary, for getting the employment details entered therein.

To assess the employment details available in the issued identity cards, Audit scrutinised 300 identity cards (75 from each of the four test-checked districts), comprising of 200 cards issued after offline registration and 100 cards issued after online registration. It was seen that, in case of offline registration, a single page (leaflet) hard card had been issued, containing the details of the beneficiary³⁰, photograph of the beneficiary and the seal and signature of the Registering Officer. In case of online registration, the identity cards were in the form of a smart card, containing details and photographs of the beneficiary. The different types of identity cards issued, are shown in **photographs 3 to 8**.

³⁰ Name, date of birth, father's/husband's name, date of retirement, photograph, signature/thumb impression



Identity card issued against offline registration



Identity card issued against offline registration



Identity card issued against online registration

From the photographs above, it is evident that identity cards had not been issued in a passbook or employment diary form, to ensure recording of the employment details on the cards, for the purpose of ascertaining that the worker had been employed in building or other construction work for the requisite number of days. Further, no separate arrangements had been made for recording the number of days a worker had remained engaged in construction work.

Thus, the Board had not issued identity cards in the required form, with sufficient space for recording the number of days of work, so that engagement of registered workers, for at least 90 days during the preceding year, which was necessary for continuation of membership of the Fund, could be verified.

While accepting the facts, the Department stated (October 2023) that the identity cards are issued in the form of smart cards. However, the proposal of

issue of identity card in the form of passbook/employment diary, would be placed before the Board/SAC for appropriate decision. It was further stated that State level unique registration numbers are being provided to the workers which are in the process of being uploaded on the National portal '*e-shram*'.

Recommendation 8: The Board may ensure issue of identity cards to workers, in passbook or employment diary form, with enough space for employers to record the details of the works carried out by the workers. Provision of benefits to registered workers, may be linked with the details of works recorded in the identity cards.