

SECTION - B

**UTILISATION OF
LABOUR CESS**

CHAPTER IV
REGISTRATION OF
WORKERS

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The manual as well as the electronic data of registered workers had significant shortcomings. Inaccuracies in capturing vital data such as Aadhaar number, mobile number and bank account number of the registered workers compromised the quality of the registration database. Deficiency in identification of eligible construction workers through proper survey resulted in non-registration of significant number of workers. TNCWWB did not initiate effective action to bring the inter-State migrant construction workers under its fold.

4.1 Registration of construction workers

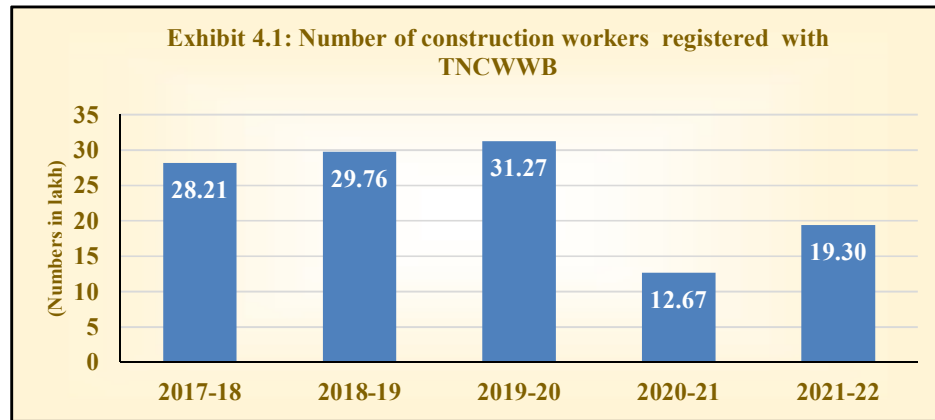
TNCWWB registers construction workers through its district offices (ACL-SSS). A total of 54 categories of building and Other Construction Workers (**Appendix 4.1**), who have completed 18 years of age but not completed 60 years of age, are eligible for registration under TNMW Act.

The registration of workers was carried out through a manual process till 18 June 2020, and the data was maintained in physical form at District Offices. From 19 June 2020, the registration process was through online. The process of registration involves online filling up of application on the website of TNCWWB and uploading of supporting documents¹² by the applicant. The online application is validated using a One Time Password (OTP) sent to the applicant's mobile number linked with his/her Aadhaar number. The online application is routed through the Village Administrative Officer, who verifies the information furnished by the applicant through an online interface in the system. Thereafter, the ACL-SSS scrutinises the application and the documents attached by the applicant and either approves or rejects the application with an intimation to the applicant. The details of the process is given in **Appendix 4.2**.

4.2 Deficiencies in the quality of registration data

The details of registered construction workers for the period 2017-22 are given in **Exhibit 4.1**.

¹² Employment certificate issued by Employer or Authorised Trade Unions representing the worker or Labour Inspector or DISH, Family card, Aadhaar card, first page of Bank Passbook and Nomination Form.



(Source: Details furnished by TNCWWB)

Audit found a steep fall in the number of construction workers registered in 2020-21 which was due to removal of inactive workers¹³ and de-duplication exercise carried out by TNCWWB in 2020, before it commenced distributing cash assistance to its registered members during COVID 19 pandemic. Audit observes that such mass scale purging of members in 2020 was indicative of lack of due diligence in the registration process over the years.

Subsequent to the data cleansing exercise in 2020, another exercise was launched by GoTN in 2022. With a view to improve governance, efficiency, transparency, and seamless service delivery, GoTN has been implementing a Data Purity Project. As part of Data Purity Project, the Aadhaar number of registered workers/Pensioners in all 18 Manual Workers Welfare Boards' registration database are checked by Tamil Nadu e-Governance Agency (TNeGA) for duplication of beneficiary by mapping with other Aadhaar seeded beneficiary databases i.e., old age pension, PM Kisan, Government employees/pensioners, Death data sets, etc¹⁴. TNeGA furnished (August 2022 and November 2022) two sets of reports on potentially ineligible workers enrolled with the Manual Workers Welfare Boards, including TNCWWB.

Audit analysed TNCWWB's members data using TNeGA's inputs on potentially ineligible workers registered with the 18 Manual Workers Welfare Boards. It was found that there were 1,53,099 potentially ineligible persons registered with TNCWWB as given in **Table 4.1**.

¹³ Workers already registered with TNCWWB but did not renew their registration within the stipulated period of five years.

¹⁴ Some of the reasons with Aadhaar mapped data were not considered for ineligibility viz., School Student Dataset, Aadhaar number not linked in Public Distribution System, PDS smartcard seems Above Poverty Line, family having more than two Gas Connections and having ₹10 lakh worth property.

Table 4.1: Ineligible persons included in TNCWWB registration data

Reasons for ineligibility	Ineligible persons		Total - All districts
	Sampled districts	Non-sampled districts	
Aadhaar ID Found in Death Dataset	47	173	220
Aadhaar ID Found in Government Employee/Pensioner Dataset	2,801	2,833	5,634
Aadhaar ID Found in Old Age Pension Dataset	38,857	54,841	93,698
Aadhaar Number found multiple times	8,745	10,528	19,273
Aadhaar number is invalid	16,722	17,552	34,274
Total	67,172	85,927	1,53,099

(Source: Data analysis of data furnished by TNCWWB and TNeGA)

Audit observed that even though TNeGA had already reported the deficiencies in August 2022, no field verification was initiated by TNCWWB (March 2023) for taking appropriate action. TNCWWB, after due verification of TNeGA reports on ineligible persons, should act against the officials/Trade Unions responsible for registering ineligible persons and the scheme benefits already distributed should be recovered.

Moreover, as per extant procedure, during registration/claim, the concerned district ACL-SSS was to verify whether the worker was a beneficiary of other schemes. As the data contain potentially ineligible persons, field verification should have been taken up much earlier to avoid payment to ineligible persons.

GoTN replied (February 2023) that field verification is under process by the district-wise Committees constituted by the Commissioner of Labour. Results of action taken based on field verification is awaited (March 2023).

4.3 Analysis of Registration data

Data analysis of 19,30,077 records of registered workers as on 31 March 2022 by Audit revealed deficiencies in registration and renewal of workers (**Appendix 4.3**) as discussed in the subsequent paragraphs:

4.3.1 Deficiencies in Aadhaar seeding

To fill an application online, the worker had to provide the Aadhaar number to be validated through an OTP received by the mobile number linked with it. Only after entering the OTP, the applicant could fill the application. Hence, capturing of correct Aadhaar number of the beneficiary was essential for registration purpose.

Data analysis of Aadhaar seeding revealed that there were 44,246 cases (2.30 *per cent*) of invalid Aadhaar numbers and multiple use of Aadhaar numbers as given in the **Table 4.2**.

Table 4.2: Data analysis of Aadhaar seeding

Ineligible category	Number of records	Reasons
Invalid Aadhaar numbers	25,416	Either without Aadhaar number or having junk data - the length of string ranged between 0 to 12 and unrelated values such as Family card numbers (Appendix 4.4)
Multiple use of Aadhaar numbers	18,830	Same Aadhaar number was used to identify 2 to 18 different workers (Appendix 4.5)

(Source: Data analysis of data furnished by TNCWWB)

Audit observed that data with junk values/errors were captured both in the erstwhile data that was migrated as well as in the online registration/renewal data without any validation checks.

Thus, non-updation of Aadhaar numbers had resulted in junk values/multiple use of Aadhaar numbers in 44,246 registration records, which would make it difficult for rendering service to the beneficiaries.

4.3.2 Other Board workers registered with TNCWWB

In addition to the activities for the welfare of construction workers, the officers of the Labour Department are involved in administering the welfare schemes of various other classes of unorganised workers such as Domestic Workers, Tailors, Washermen, Hairdressers, etc., for which 17 separate Boards have been constituted by GoTN. While TNCWWB caters to 54 categories of construction workers (**Appendix 4.1**), the 17 other Boards cater to 60 categories of other unorganised workers (**Appendix 4.6**). Each class of workers have a four-digit Work Code to identify their occupation. The data containing 19,30,077 records of registered construction workers was analysed with the related Work Code and it was noticed that in 2,753 records, the Work Code did not relate to TNCWWB, as given in **Table 4.3**.

Table 4.3: Work code of registered workers not pertaining to TNCWWB.

Work code not pertaining to TNCWWB	Number of workers		Total
	Sampled districts	Non-sampled districts	
Work Codes pertaining to other 17 Boards under TN Manual Workers Welfare Board	267	367	634
Work Codes not available in the 114 work codes given in Appendices 4.1 and 4.6	931	1,188	2,119
Total	1,198	1,555	2,753

(Source: Data analysis of data furnished by TNCWWB)

Audit observed that the field level officers of the Labour Department, who deal with construction workers as well as other class of workers belonging to the 17 other Boards, had erroneously registered 2,753 non-construction workers as eligible members of TNCWWB.

4.3.3 Deficiencies in capturing Mobile Numbers

Though application to register could be initiated only through OTP received through Aadhaar linked mobile number, Audit, however, found that, in 5.86 lakh cases, mobile numbers were not captured or were invalid. Audit analysis revealed that there were deficiencies of capturing of mobile numbers as given in **Table 4.4**.

Table 4.4: Deficiencies in capture of mobile numbers

Sl. No.	Details of records	Number of records of workers
1	Mobile number not captured	5,77,850
2	Mobile number captured as zero	7,261
3	Junk Values	1,072
4	Invalid mobile numbers	105
Total		5,86,288

(Source: Data analysis of data furnished by TNCWWB)

Further, in 8,327 records, same mobile numbers were captured multiple times against different registered workers' data. Such instances ranged from 2 to 26 of the sampled records, as given in **Appendix 4.7**.

4.3.4 Deficiencies in capturing of bank accounts of registered workers

The registered workers avail various scheme assistances through their registered bank accounts. Even though the bank accounts of the registered construction workers were captured in the online portal, these bank accounts were not validated through Aadhaar numbers by Unique Identification Authority of India (UIDAI). Results of analysis of data containing 19,30,077 records of registered workers of TNCWWB are given in **Table 4.5**.

Table 4.5: Deficiencies noticed in capture of bank accounts of registered workers

Sl. No.	Details of records of registered workers	In numbers	Deficiencies
1	Bank account number not captured	4,35,471	Kept blank or '0'
2	Junk value (less than six digits)	4,725	Less than six-digit bank account numbers are not used by banks
3	Same bank account number for multiple workers	8,992	Ranged from 2 to 1,693

(Source: Data analysis of data furnished by TNCWWB)

As an illustration, invalid bank account numbers, including junk values, found in the database, is given in **Table 4.6**.

Table 4.6: Illustrative cases of Invalid Bank account numbers and junk values

Bank account Number	Cuddalore	Dharmapuri	Dindigul	Tiruchirappalli	Tiruvannamalai	Ariyalur	Kallakurichi	Namakkal	Perambalur	The Nilgiris	Villupuram	Total
11111111	178	0	0	0	0	0	0	0	0	0	6	184
2323222223	0	0	0	0	0	13	0	0	0	0	0	13
123456789	0	2	1	0	1	0	0	7	0	1	0	12
5555555555	0	0	0	0	0	0	0	0	0	0	24	24

(Source: Data analysis of data furnished by TNCWWB)

Maintaining only validated bank account details is very important. Audit noticed a case of fraud by changing the bank account of workers by a contract employee and fraudulently transferring COVID cash assistance of two beneficiaries to her bank account. Further, during COVID-19 pandemic, TNCWWB was not able to transfer the COVID cash assistance to all its registered workers due to non-availability of their proper bank accounts. This led to a situation where assistance to 1.64 lakh registered workers could not be made, as assistance was done through Direct Beneficiary Transfer mode to their bank accounts that were Aadhaar linked.

Due to the above deficiencies, the respective ACL-SSS in district offices continued to make payment to the beneficiaries through ECS which is kept outside the online portal database defeating the purpose of capturing the bank accounts in the registration database.

4.3.5 Registration of ineligible workers outside registration criteria

Date of Birth (DOB) of the worker is important as it decides the eligibility/ineligibility of the worker for registering with TNCWWB and pension is also allowed based on the age of the registered workers. An analysis of data containing 19,30,077 records of registered workers of TNCWWB, as on 31 March 2022, is given in the **Table 4.7**.

Table 4.7: Observation on analysis of data of registered workers

Sl. No.	Item	Number of registered workers	Observations
1	More than 60 years	1,00,857	No input validation/non-verification.
2	Below 18 years	28	Minors are not eligible.
3	Non-capture of date of birth	17	No input validation/non-verification without DOB, eligibility could not be verified.

(Source: Data analysis of data furnished by TNCWWB)

In Sivagangai district, the DOB of one member with registration ID 24MZDR081536 was 01 July 2029 and date of registration was captured as

22 December 2066. This shows that there was no validation control in capturing the data. Inclusion of ineligible persons and incorrect/invalid/null values were due to non-enforcement of input and validation control checks, non-cleaning/non-updating of data and lack of monitoring.

TNCWWB replied (December 2022) that most of the data were migrated from the older database which is having legacy data also. However, new software application has been developed with data validation controls.

The reply is not acceptable, as 26,428 applications for renewal/approval had registrations dated prior to their date of birth. Some illustrative cases are given in **Table 4.8**.

Table 4.8: Illustrative cases where registration date is prior to date of birth

Application Number	Date of Application	Date of Approval	Date of Registration	Date of birth	District
TNUWWB000001231147	02/01/2021	18/05/2021	01/01/1970	01/01/1995	Virudhunagar
TNUWWB00000418963	07/01/2021	22/10/2021	01/01/1970	01/01/1995	Karur
TNUWWB000001456790	20/01/2021	05/01/2022	01/01/1970	01/01/1995	Madurai
TNUWWB000001157927	28/12/2020	08/12/2021	01/01/1970	30/12/1996	Dindigul

(Source: Data furnished by TNCWWB)

Therefore, it is necessary to ensure the accuracy of both migrated legacy data and dataset through online portal.

GoTN replied (February 2023) that all the members' data was migrated from the older database which did not have field validation using Aadhaar, but in the present software the Aadhaar number and mobile number were validated through OTP.

Audit verified whether the new IT system with Aadhaar and mobile number-based verification was able to ensure data integrity, and found that the issues discussed above continued to prevail, undermining the integrity of the data held in the new system as given below:

- There are 512 Aadhaar card numbers with junk values with varied string length¹⁵ (7, 8, 10, 11 and Null value)
- 210 memberships were renewed with duplicate Aadhaar cards (105 x 2). Accepting duplicate Aadhaar card numbers could be attributed to lack of input controls and validation controls.
- 1,504 manual workers, who were not construction workers, were registered.
- 104 mobile numbers had junk values with invalid string length.
- 945 invalid bank account numbers were found captured.
- 1,750 members were allowed to be registered/renewed beyond the age of 60.

¹⁵ Aadhaar number is a 12-digit string.

The above significant issues in the quality of data captured even after launching the new system, points to lack of proper input and validation controls in the IT system. Audit observed that the above issues in data integrity had ultimately impacted timely settlement of claims for various benefits under the schemes implemented by TNCWWB due to mismatch in the identity and bank details of the beneficiaries, as discussed in **Chapter V**.

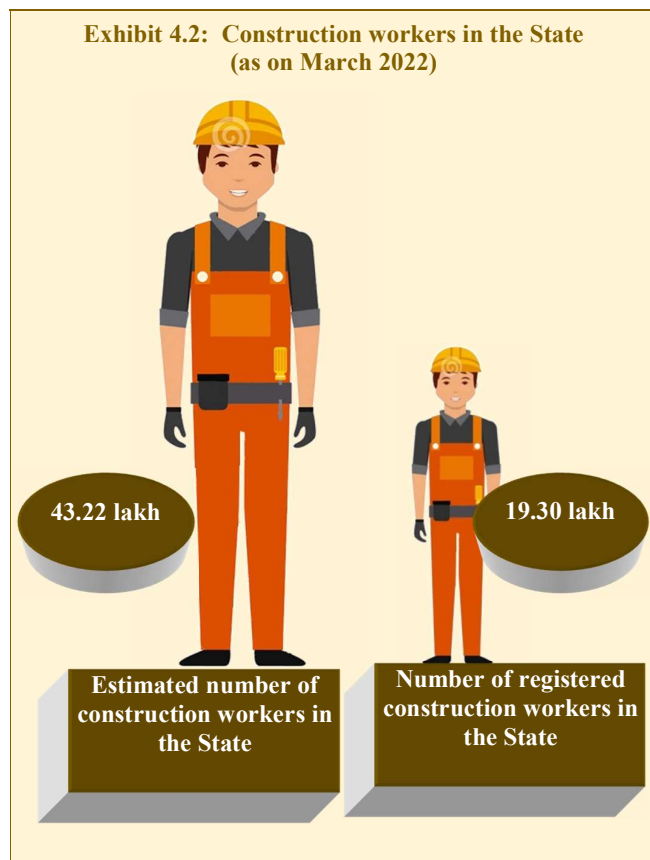
4.4 Non-estimation of construction workers and non-conduct of survey

Even though registration of construction workers is voluntary, there is a need for coverage of non-registered workers in the State for providing scheme benefits. This aspect has been stressed by the Hon'ble Supreme Court and GoI. Further, the Hon'ble Madras High Court has directed (August 2020) GoTN to undertake an extensive survey to identify, register and enlist all unorganised manual workers to ensure that they benefit from various government schemes.

The Hon'ble Supreme Court, in its judgement, stressed (March 2018) that registration of Establishments and construction workers should be seriously looked into by all the State Governments and the Ministry of Labour and Employment.

Audit, however, found that TNCWWB did not initiate any proactive measures like conducting survey to identify eligible workers for registration. Audit attempted to estimate the number of construction workers in Tamil Nadu with the available data and found that:

(i) In July 2020, GoI had estimated the number of construction workers in the State as 43.22 lakh¹⁶ and only 19.30 lakh were found registered by TNCWWB (**Exhibit 4.2**) as of March 2022.



¹⁶ Based on NSSO survey.

Thus, there was a 55 *per cent* shortage in registration of construction workers.

(ii) GoTN has been implementing a scheme for payment of accident relief of ₹5 lakh per worker who succumb to accidents at workplace. During 2017-22, out of 147 claims settled, 121 claims were from non-registered workers (82 *per cent*). Therefore, going by the data on payment of accident relief, the shortage in registration was 82 *per cent*.

(iii) A joint physical verification of 21 construction sites by the Audit Team along with officers of DISH/ACL-SSS revealed that 398 out of the 501 construction workers employed in the sites were inter-State migrant workers and none of these were registered with TNCWWB. Of the remaining 103 native-State workers, 55 workers (53 *per cent*) were not registered with TNCWWB. As such, 453 workers (90 *per cent*) were not registered with TNCWWB.

Considering the significant shortfalls observed in registration of eligible workers from the secondary evidence discussed above, it is clear that TNCWWB has not made efforts to identify and register all eligible workers in line with the directions of the higher Judiciary.

GoTN replied (February 2023) that orders have been issued¹⁷ (December 2022) to appoint a qualified person as consultant for studying and preparing a 'Request for proposal', along with the budget for conducting the survey.

4.4.1. Non-utilisation of available data for registration of workers

Rule 240 of TNBOCW Rules, 2006 provides that every Employer shall maintain details of workers employed by him/her in the prescribed form (Form XV). As on 31 March 2022, 15,219 construction establishments were registered with DISH under BOCW Act. DISH has access to details of workers being employed at worksites through Form XV¹⁸ (**Appendix 4.8**). This data if shared with concerned authorities can help in identification of unregistered workers working at construction sites. During Joint Physical Verification of 21 construction sites only 11 were DISH registered construction sites, wherein, the inspecting team found that there were 404 construction workers (398 inter-State migrant and six native-State workers) and none of them were registered with TNCWWB.

DISH is the only authority empowered to inspect the construction sites with access to employers' records. Had DISH shared with TNCWWB, the data of employers and workers working with them, efforts to cover unregistered workers, including inter-State migrant workers could have gained momentum. However, no attempt was made by DISH and TNCWWB in this regard.

The fact that only 52 *per cent* (11 out of 21 construction sites) inspected by Audit were registered with DISH shows that efforts to bring unregistered construction workers under protective cover were abysmally poor. Only with proper co-ordination between agencies, focussed surveys and appropriate

¹⁷ G.O. (Ms). No.162 (LW&SDD) dated 7 December 2022.

¹⁸ Register of Building and other Construction Workers employed by the Employer.

follow up actions unregistered construction workers can be brought under the ambit of TNCWWB to avail the welfare schemes.

To a specific audit query, DISH stated (January 2023) that it verified the Form XV on the construction site itself and that there were no specific provisions in the Act/Rules to collect and share the data. Reply of DISH is not tenable as registration of establishments and registration of construction workers need not be looked in isolation. Further, it is pertinent to mention that during Joint Physical Verification, it was noticed that out of 11 registered establishments, only one establishment was maintaining Form XV, which is contrary to the reply of DISH. Thus, Audit observed that the State lacked in enforcement of TNBOCW Rules and no system existed for DISH and TNCWWB to work in tandem.

During the Exit conference, ACS to Government stated that directions have been issued to conduct a meeting between DISH and TNCWWB every month for sharing of information for better coverage of workers. Results of the action taken were awaited (March 2023).

4.5 Timelines for registration of workers

Registrations and renewals of construction workers for the period from June 2020 to March 2022 were analysed and the following observations are made:

4.5.1 Non-availability of benchmark timeline for service delivery

The processes of registration and renewal involve optimal service delivery by TNCWWB to the construction workers through its district offices. TNCWWB has not benchmarked any timeline for registration, renewal and sanctioning of TNCWWB scheme assistance. In the absence of benchmark, there is a lack of accountability on the part of officials in providing service delivery.

4.5.2 Pendency in processing applications

As of December 2022, 28,274 applications for registration/renewal made between June 2020 and March 2022, have been pending approval and the details of pendency are as given in **Table 4.9**.

Table 4.9: Applications pending registrations/renewals of construction workers

Type	Total	Less than six months	Six months to one year	One to two years	More than two years
Sampled	10,191	0	2,759	7,005	427
Non-sampled	18,083	0	3,837	13,728	518
Total	28,274	0	6,596	20,733	945

(Source: Data furnished by TNCWWB)

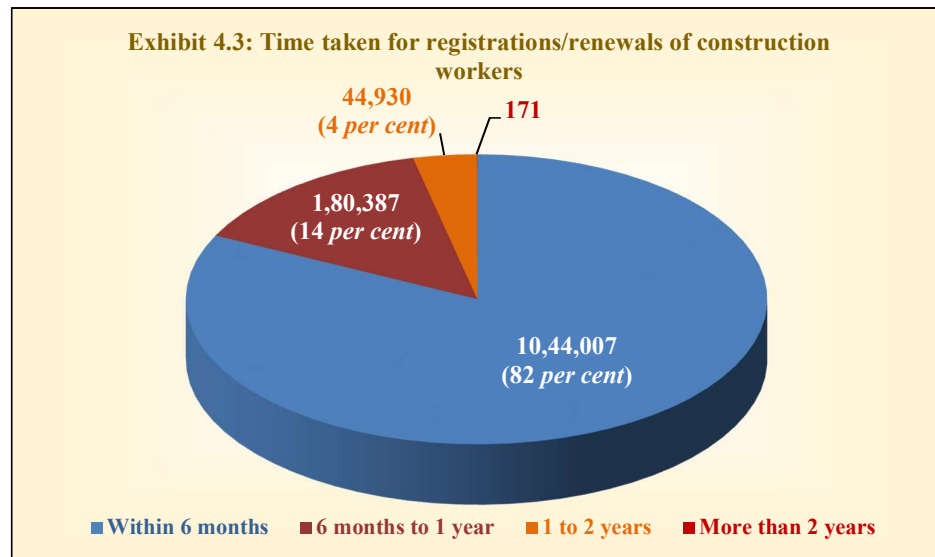
As seen from **Table 4.9**, 21,678 applications were pending for more than a year. This indicates laxity in processing the applications and lack of effective monitoring which requires urgent remedial measures.

Audit test-checked 108 applications that were pending registration as on 31 March 2022. It was seen that:

- 38 of the 108 applications stated to be pending as on 31 March 2022 were either already approved or rejected as of 2 February 2023 (date of audit scrutiny).
- In 30 out of 108 cases (28 per cent), no action was taken by ACL-SSS till 2 February 2023 (the date of audit scrutiny).
- In 36 cases, the applicants took inordinate time to upload necessary documents requested by the ACL.

4.5.3 Delay in registration and renewal

Out of the 19.30 lakh worker's data sets made available to Audit, data sets of 12.76 lakh workers¹⁹ were new registration/renewals during June 2020 to March 2022. The time taken for registrations/renewals are shown in Exhibit 4.3.



(Source: Based on data furnished by TNCWWB)

Audit observed that:

- (i) Time taken to complete the registration ranged from one to 818 days.
- (ii) Since no timelines were prescribed for registration and renewal of workers, Audit adopted it to be six months in line with Hon'ble Supreme Court's direction. Of 12.70 lakh workers who registered/renewed, 18 per cent of registrations (2.25 lakh) were done only after six months.
- (iii) The average time taken for those belated registrations was 292 days (nine months).

¹⁹ Out of 12,76,312 registered workers, 6,753 did not have date of registration/application and 64 dates of registration/application were captured with errors. Therefore, only 12,69,495 were analysed.

(iv) In 64 cases approvals were carried out even before the applications were made indicating absence of any validation control in the application software.

4.5.4 Analysis of reasons for rejection

Out of 1.36 lakh rejected applications²⁰, 28,923 applications were rejected after one year. In 16 rejected cases, the rejected date precedes application date, which indicates lack of validation controls, as detailed in **Table 4.10**.

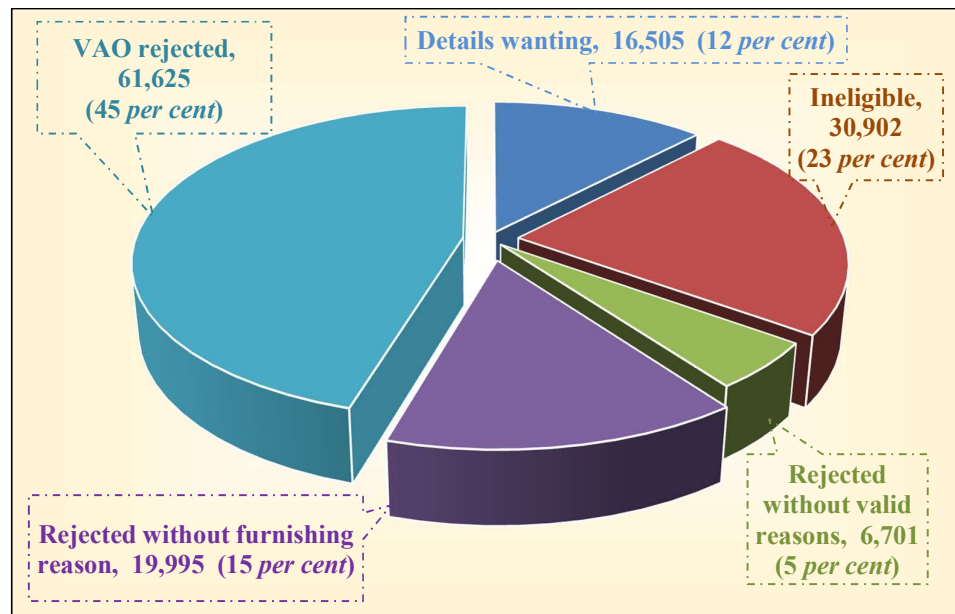
Table 4.10: Rejection of applications for registration

Type	Total	Less than six months	Six months to one year	One to two years	More than two years	Rejection date precedes application date
Sampled	62,550	45,553	11,573	5,340	74	10
Non-sampled	73,178	29,503	20,160	23,130	379	6
Total	1,35,728	75,056	31,733	28,470	453	16

(Source: Based on data furnished by TNCWWB)

Out of 1.36 lakh rejected applications, Audit reviewed 1.23 lakh applications and noticed that they were rejected for various reasons, as given in **Exhibit 4.4**.

Exhibit 4.4: Reasons for rejection of membership applications



(Source: Analysis of application by Audit)

It was seen that applications for membership registration were rejected citing incorrect reasons; some of those are discussed below:

- 181 applications were rejected on the ground that the applicant owns land in the village.

²⁰ These applications for registration/renewal were received during June 2020 to March 2022.

- 63 applications were rejected on the ground that the spouse/relative of the applicant is on a gainful employment.
- 3,635 applications were rejected on the ground that the applicant was an agricultural worker.

None of these were prescribed as criteria for rejecting the application. Also, 923 applications that were rejected citing mismatch between age and date of birth could have been resolved by calculating it using the date of birth.

Audit test-checked 100 cases of rejected applications for registration and observed that the average time taken to decide on these applications was 243 days where the minimum was one day and the maximum 852 days.

The abnormal delays in approving membership applications point to lacunae in the registration process, adversely impacting the workers as they would be eligible for any benefit only after they become member of TNCWWB.

GoTN replied (February 2023) that the subject will be placed in the ensuing Board Meeting and timelines will be fixed for registration and renewal.

4.6 Registration of inter-State migrant workers

DISH is assigned with the task of directing the Employers to register the migrant construction workers with TNCWWB. A monthly periodical report consisting of details of unregistered migrant manual workers engaged in construction work was to be submitted by DISH to the Commissioner of Labour and TNCWWB. The Secretary, TNCWWB was to take action to register them for a period of one year based on the Employer certificate issued by the present Employer. The photographs of the identified inter-State migrant workers must be captured at construction site and the data has to be processed by the concerned ACL-SSS offices and registration card shall be distributed at the site within a week. The inter-State migrant workers are eligible for all the welfare schemes implemented by TNCWWB except pension.

The details of inter-State migrant workers and their Employers are also collected by the District Collectors, DISH, and LW&SDD through online portal. As per Management Information System of the Commissionerate of Labour (November 2022), 1.30 lakh migrant workers were registered through the web portal which include 7,319 construction workers belonging to 29 States/UTs (**Appendix 4.9**). During COVID-19 pandemic (March 2020), 1.45 lakh inter-State migrant construction workers were distributed Dry ration kits. Audit observed that TNCWWB did not maintain any data pertaining to the 1.45 lakh inter-State migrant beneficiaries of Dry ration kits. Further, the 7,319 inter-State migrant workers registered in the Commissionerate of Labour portal were also not registered with TNCWWB.

Audit, however, found that as of March 2023, not a single inter-State migrant worker was registered with TNCWWB. During Joint Physical Verification, it was noticed that there were 398 inter-State migrant workers at the construction sites visited and none of them were registered with TNCWWB

(**Appendix 4.10**). Even though GoI and Hon'ble Supreme Court have issued instructions for registration of migrant workers, non-registration of inter-State migrant construction workers resulted in denial of scheme benefits to them. Further, TNCWWB has not initiated portability of inter-State migrant workers as envisaged in Mission Mode Project (MMP) for getting benefits without interruption.

GoTN stated (November 2022) that initially there were 24,274 inter-State migrant workers registered in March 2020 and non-registration/renewal might be due to migratory nature of work from one place to another and shorter periodicity of renewal *i.e.*, one year.

GoTN also stated (February 2023) that registration of workers with TNCWWB could not be legally enforced, but instructions were issued to the field level officers to encourage the employers to register the construction workers employed in their construction sites. Further, GoTN stated that online registration of inter-State migrant workers has been launched on 20 July 2022 and 67 applications have been received so far and were under scrutiny by respective ACL-SSS. Audit observed that effective IEC activity is required for facilitating enrolment of inter-State migrant construction workers.

4.7 Conclusion

Despite creation of TNCWWB in 1994, significant shortfalls continued in the registration process of unorganised construction workers. The manual as well as the electronic data of registered workers had significant shortcomings. Inaccuracies in capturing vital data such as Aadhaar number, mobile number and bank account number of the registered workers compromised the quality of the registration database. Deficiency in identification of eligible construction workers through proper survey had resulted in non-registration of significant number of workers. TNCWWB did not initiate effective action to bring the inter-State migrant workers under its fold. None of the estimated 1.45 lakh inter-State migrant construction workers were registered with the TNCWWB.

4.8 Recommendations

- TNCWWB should coordinate with DISH to ensure coverage of all eligible workers at registered construction sites, including inter-State migrant construction workers.
- Government should order a survey of construction workers and ensure registration of all eligible workers with TNCWWB.
- TNCWWB should ensure integrity of its database of registered members for hassle-free processing of claims.
- In order to provide for general welfare of the workers, Government should amend the TNMW Act, 1982 and TNBOCW Rules, 2006 to make registration of workers with TNCWWB mandatory. A penalty clause to deter those employers/contractors for non-compliance may also be included.