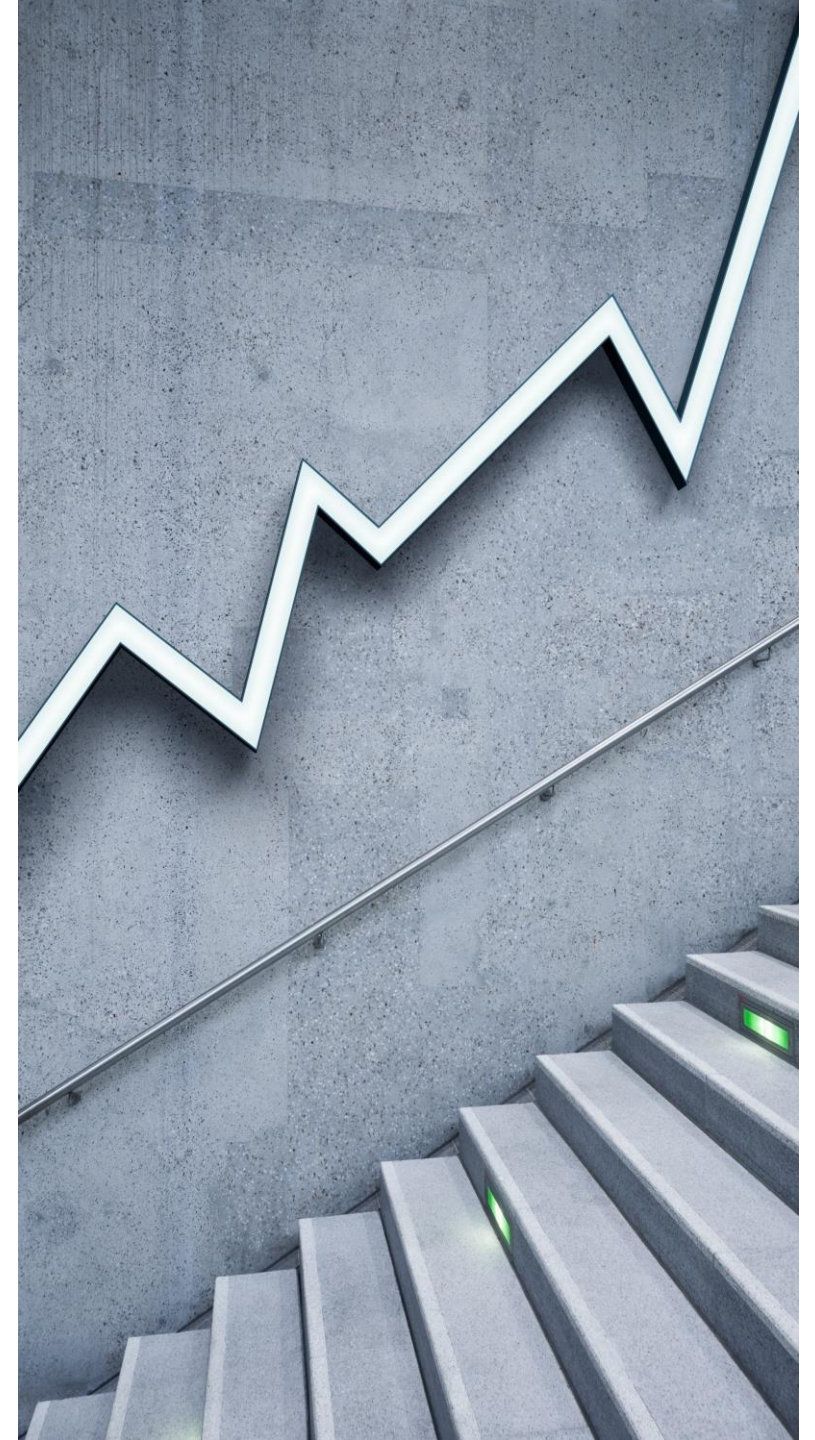


***The Employment Injury Scheme (EIS) of Bangladesh
An Interim Review***

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I. BACKGROUND AND OBJECTIVES



- The Employment Injury Scheme (EIS) – one of the key components of Bangladesh's National Social Insurance Scheme (NSIS) under the National Security Strategy (NSSS) – has been implemented on a pilot basis since June 2022
 - The foundation for Bangladesh's EIS was laid with the signing of the Berlin Declaration at the Headquarter of the German Social Accident Insurance (DGUV) in 2019
 - The EIS Pilot was inaugurated, covering approximately 40 lakh workers belonging to 2000-3000 factories contributing to the export-oriented RMG sector of Bangladesh
 - The Pilot is built on the vision to produce an efficient, no-fault, and risk-sharing EIS based on the relevant international labour standards
- As per the framework, the general objectives of the scheme are fivefold
 - First, ensuring the payment of benefits for the contingencies' duration and contributing to safeguarding decent living conditions for the victims and their families
 - Second, providing benefits in line with international standards
 - Third, aiming to protect employers from costly lawsuits in case of severe industrial accidents that can affect the industry's reputation as a whole

I. BACKGROUND AND OBJECTIVES



- Fourth, providing for financial and institutional transparency
- Fifth, providing adequate time for the implementation of a full-fledged wage-based EIS in Bangladesh
- Based on the mentioned objectives of EIS, it was decided to collect data from the factory level in order to assess the cost of the benefits and nature of accidents over time
- Since the EIS has passed its first three years, there is a demand for a mid-term evaluation of the EIS to understand major achievements, challenges, and lessons learned for the future
 - This study has been carried out to assess the performance of the EIS and to take the lessons for future course of action on the employment injury insurance system in Bangladesh
 - The study has been carried out by the Centre for Policy Dialogue (CPD) in partnership with the GIZ

Objectives

- The broad objective of this interim study is to review the current status of the EIS Pilot and evaluate its potential for scaling up to the national level by 2027. In light of this, the specific objectives of the study are as follows:
 - To review and analyse the institutional framework, operational mechanism, and financial structure of the scheme
 - To assess the sectoral scale-up of the scheme in EPZs, leather and footwear, and other industries
 - To assess the beneficiaries' challenges, expectations and their social and economic benefits from the scheme
 - To assess the preparation for transitioning into a full-fledged wage-based scheme following the current timeline and activities
 - To identify gaps and challenges, and recommendations for the EIS project to scale it up to the national scheme

2.TIMELINE-WISE INDICATORS OF EIS

- To assess EIS's progress and potential, periodic joint indicators have been studied, as outlined in the Table –

Year	Month	Indicators
2022	March	Tripartite EII Committee finalises the Agreement on the final design of the Pilot (Berlin Agreement/Declaration)
2023	June	15 brands support the Pilot financially; 80% of factory accidents reported; 90% of claims processed
	December	30 brands support the Pilot; 50% staff planning completed; 50+ claims processed
2024	June	40 brands support the Pilot; 80 factories sign MoU for accident data; 75% staff planning completed; MIS operational; 40% factories trained
	December	60% factories trained; 60+ brands support the Pilot; 120 factories sign MoU; Audited financial statement and actuarial valuation published
2025	June	National EIS extension strategy discussed; 100% staff planning and capacity building
	December	Legal and institutional setup designed; Tripartite discussion on legal framework held; 100% factories trained; Audited financial statement published
2026	June	Legal framework presented to Legislature
	December	Financial statement and actuarial analysis published; Costing of employer liability completed
2027	June	Law adopted; Factories pay directly to EIS institution

3. CROSS-COUNTRY EXPERIENCES OF EII



3.1 Legal Structure: All five countries selected under the review study have enacted specific laws or decrees mandating employment injury insurance, which provides the legal backbone for institutional setup and benefit delivery, ensuring mandatory participation

1. **Thailand:** Workmen's Compensation Act (1994) mandates EII for private sector workers
2. **Cambodia:** Sub-decree of 2008 establishes EII under national legislation
3. **Malaysia:** Employees' Social Security Act (1969) provides a unified legal base
4. **India:** Multiple overlapping laws (ESI Act 1948, WCA Act 1923) govern the system
5. **Philippines:** Presidential Decree No. 626 governs the Employees' Compensation Scheme

3.2 Institutional Framework: Each country assigns implementation to a centralized institution supervised by a relevant ministry. Medical and legal appeals are usually handled by dedicated boards or tribunals:

1. **Thailand:** Operated by SSO under the Ministry of Labour; has a tripartite fund committee
2. **Cambodia:** NSSF executes the scheme; dual oversight from the Labour and Finance Ministries
3. **Malaysia:** PERKESO manages the scheme with a medical board for assessment
4. **India:** ESIC under the Ministry of Labour; the appeal process includes Medical Tribunals
5. **Philippines:** ECC under DOLE, with SSS and GSIS handling the private/public sector respectively

3. CROSS-COUNTRY EXPERIENCES OF EII



3.3 Coverage: Coverage varies in scope, but all schemes apply to formal sector workers. Informal, self-employed, and seasonal workers are included in some but not all systems

1. **Thailand:** Covers formal workers in the private sector; excludes agriculture and NGOs
2. **Cambodia:** Includes seasonal and self-employed workers; minimum of 8 employees
3. **Malaysia:** Covers ≥ 1 employee; includes foreign and contract workers
4. **India:** Applies to power-using units (≥ 10 employees); salary cap of Rs 21,000
5. **Philippines:** Covers both sectors via SSS and GSIS; includes seasonal/self-employed workers

3.4. Eligible Beneficiary: All countries ensure benefits for both injured workers and legal dependents in death cases, though the criteria for dependents slightly vary

1. **Thailand:** Includes spouse, children (biological and posthumous), and parents
2. **Cambodia:** Recognises spouse, children, and dependent elders under legal decree
3. **Malaysia:** Covers workers earning \leq MYR 4,000 and their dependents; includes foreigners
4. **India:** Eligible injured workers and legal dependents per ESI Act
5. **Philippines:** Recognises dependents in line with GSIS/SSS frameworks

3. CROSS-COUNTRY EXPERIENCES OF EII



3.5 Benefits: All schemes provide comprehensive benefits including medical care, pensions, funeral grants, and rehabilitation. Some countries offer unique add-ons –

1. **Cambodia:** Includes constant attendance allowance for severely injured
2. **Malaysia:** Offers education support for children of affected workers
3. **Thailand:** Covers all standard benefits, including rehabilitation and death grants
4. **India:** Provides cash/in-kind rehab support and compensations for disabilities
5. **Philippines:** Includes full benefit package and RTW support for injured workers

3.6 Registration: Registration of employers and employees is mandatory, mostly digitized, and required early in employment to ensure access to benefits

1. **Thailand:** Employers must register within 30 days of hiring
2. **Cambodia:** Requires both employer and employee registration via NSSF
3. **Malaysia:** Online registration required for employees and owners' spouses
4. **India:** Documentation submitted to ESIC regional office for a registration code
5. **Philippines:** Employer must register worker with SSS/GSIS within 30 days

3. CROSS-COUNTRY EXPERIENCES OF EII



3.7 Reporting: Prompt reporting by employers is mandated in all countries, with fixed deadlines ranging from 24 hours to 15 days, depending on country

1. **Thailand:** Report within 15 days (latest within 180 days) to SSO
2. **Cambodia:** Report incidents to NSSF within 48 hours; arrange medical care
3. **Malaysia:** Report to PERKESO within 48 hours; urgent cases within 24 hours
4. **India:** Timeline not explicitly detailed but follows ESIC guidelines
5. **Philippines:** Employers maintain logbooks and submit reports to SSS/GSIS

3.8 Medical Treatment and Assessment: Primary care is the employer's responsibility, while final assessment and benefit decisions are handled by certified boards under institutional frameworks

1. **Thailand:** Treatment at registered hospitals; Occupational Health Clinics assist
2. **Cambodia:** Employers provide emergency care and transfer to NSSF-approved facilities
3. **Malaysia:** PERKESO provides free care, OSH programs, and rehabilitation
4. **India:** Assessments and reimbursements handled by ESIC medical boards
5. **Philippines:** Medical certification guided by GSIS/SSS procedures

3. CROSS-COUNTRY EXPERIENCES OF EII



3.9 Benefit Payments: Payments are typically deposited directly into beneficiary bank accounts, ensuring transparency and traceability

1. **Thailand:** Funds transferred to designated bank accounts via SSO
2. **Cambodia:** Lump-sum via cheque, monthly pensions via bank transfer
3. **Malaysia:** Direct payments through PERKESO banking system
4. **India:** Claims processed and paid through ESIC to bank accounts
5. **Philippines:** Payments handled through SSS/GSIS systems

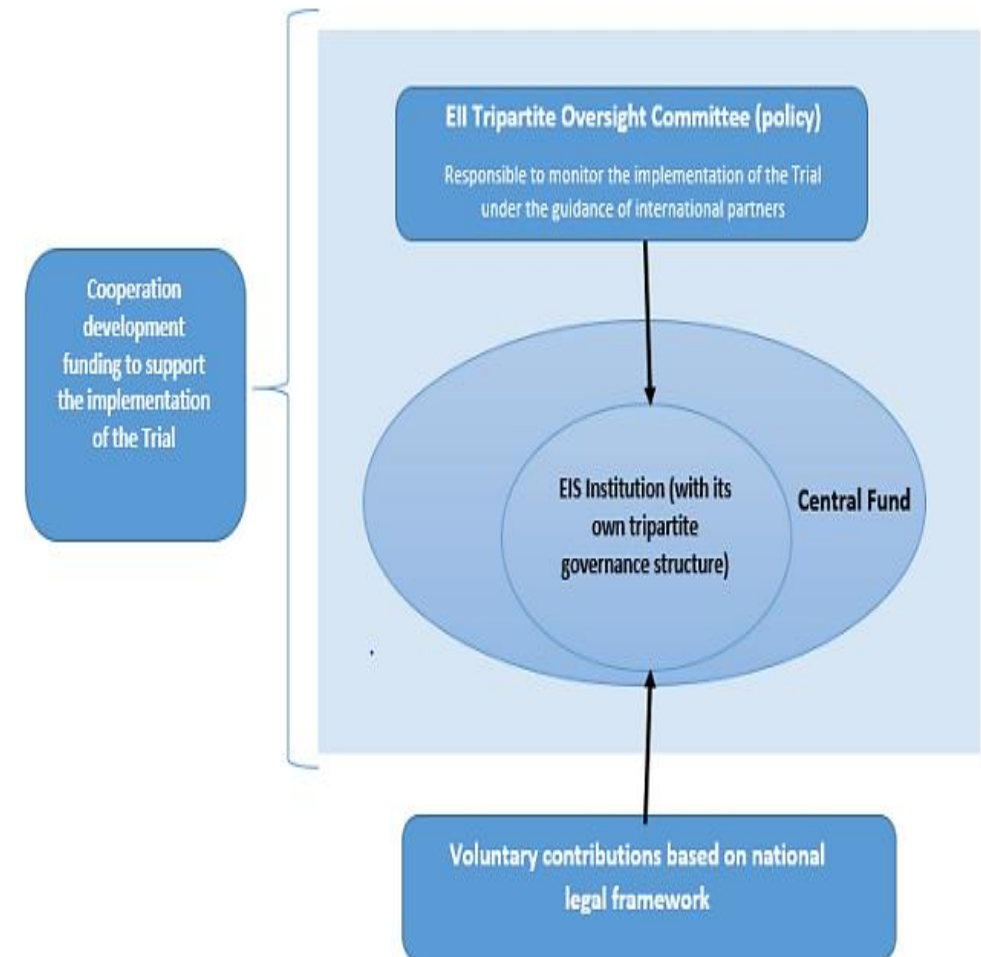
3.10 Funding: EII schemes are mostly employer-funded, with variable contribution rates depending on wages. Penalties for late payments are common and enforce compliance

1. **Thailand:** Employer-only contribution (0.2–1%), with merit-based risk adjustments
2. **Cambodia:** Employer contributes 0.8% of wage; strict reporting deadlines
3. **Malaysia:** Employer contribution 0.5%
4. **India:** Employer (3.25%); 12% penalty on delay
5. **Philippines:** Employer pays 1%; government adds irregular contributions; strict penalties (up to 25%)

4. CURRENT STATUS OF THE EIS: INSTITUTIONS

4.1 Institutional Structure as per Framework

- The EIS Pilot follows the institutional structure proposed in its framework (see Figure 1)
- Oversight is provided by a **Tripartite Committee**, while operations and data management are handled by a designated implementing agency
- The implementing agency follows **ISSA guidelines on good governance**
- The Pilot is embedded within the existing legal framework—**Bangladesh Labour Act and SRO 291-Law/2015**, specifically provisions 212–236 related to the Central Fund
- An **ad-hoc administrative structure** is set up under a **Central Fund sub-account** to ensure that resources are used exclusively for the Pilot
- This structure supports **capacity-building** of stakeholders to prepare for scaling up the scheme



4. CURRENT STATUS OF THE EIS: **FINANCING**



4.2 Financing & Contribution Mechanism

Compensation & Funding:

- Central Fund covers long-term compensation for permanent disability and death
- Pilot fund provides top-up pensions aligned with ILO Convention No. 121
- Total cost estimated at 0.15% of wages; USD 8.99 million annual benefits; USD 900,000 institutional cost

Employer Contributions:

- Employer contributes to the central fund, not to the EIS. EIS funding is provided by the brands
- Financial transparency through cost data collection aims to build employer acceptance for future national funding
- Currently, brands voluntarily fund all Pilot benefits

Brand Contributions:

- Started with 7 brands; now more than 80 brands, mostly from the EU
- ILO and GIZ actively engage brands, highlighting ethical responsibility and low cost
- Brands pledge 0.019% of sourcing value; contributions managed by the ILO with independent audits selected by EIS Pilot tripartite body

4. CURRENT STATUS OF THE EIS: OPERATION



4.3 Operational Mechanisms

Scope & Coverage:

- Covers export-oriented RMG sector workers for workplace-related accidents (excluding natural disasters)
- Event-driven scheme with no prior registration needed
- Both permanent and temporary workers eligible for permanent disability benefits
- Survivors/dependents can claim benefits after document verification

Limitations & Expansion:

- Does not yet fully comply with ILO Convention No. 121; lacks full medical services coverage
- Commuting accidents covered from July 2024, including accidents on travel between home and factory
- On-duty road traffic accidents included

Challenges:

- Eligibility disputes when workers take alternate routes during disruptions
- Some factory owners are reluctant to accept responsibility for commuting RTAs
- Natural deaths at work (e.g., heart attacks) are excluded despite possible workplace contribution
- Case study highlighted the need for better coverage of sudden health events and improved leave policies

4. CURRENT STATUS OF THE EIS: **REPORTING**



4.4 Reporting Mechanisms & Claims Processing

EIS Reporting Requirements

- Worker/dependents apply via factory (covers Central Fund & EIS)
- Form on Central Fund website; documents: NID, certificates, bank details, etc.
- Factory → BGMEA/BKMEA → Central Fund → EIS PSU (verification & MIS entry)
- Sub-Committee approves; SMS sent; payment to bank account
- Rejected cases sent to EIS Governing Body

Duration & Efficiency

- Avg. 30 days with correct documents
- Up to 60 days if further verification needed
- Delays often at factory/association level

Reporting via LIMA

- Factories report accidents digitally through DIFE's LIMA system
- Tutorials for registration and reporting are on the EIS website

Assurances & Incentives

- Brands assure owners reporting won't harm business
- Non-reporting owners bear costs; Central Fund may deduct from exports

4. CURRENT STATUS OF THE EIS: **REPORTING**



Challenges in Reporting

- Challenges in Reporting
- Owners often suppress reporting to protect their reputation, using threats, cash offers, or ID seizure.
- Accidents are sometimes misclassified as commuting incidents, while victims fear job loss if they report.
- Resistance from factories and workers hinders verification, leading to widespread underreporting.

DIFE

- Often misses commuting/workplace accident reports
- Third-party audits & complaint boxes suggested for transparency

Claims Challenges

- Delays from factories/associations compiling cases
- Difficulties collecting documents (e.g., inheritance)
- Legal issues: minors, multiple dependents, negligence

Database & Awareness

- Databases exist but need digitalisation & due diligence
- Low worker/family awareness; factories usually guide process

4. CURRENT STATUS OF THE EIS: **TREATMENT & INJURY**



4.6 Medical Treatment & Injury Assessment

General Framework & Medical Care

- General Framework & Medical Care
- Employers must provide compensation and medical treatment for work injuries; DIFE doctors assess cases under BLA Schedule I.
- Victims are usually treated in nearby hospitals, with costs mainly covered by factories or EIS.
- Minor expenses may still fall on victims' families.

Rehabilitation & Reintegration

- Laws lack formal rehabilitation or return-to-work provisions; some support provided near factories.
- Plans to collaborate with KComwell and local bodies (e.g., BRAC, CRP, CDD) for prosthetics and rehab.

Capacity & Assessment

- Only two DIFE doctors are trained; Schedule I is outdated and excludes many injuries (e.g., brain, internal).
- Regional centres and updated guidelines are needed for better assessment and compensation.

Occupational Diseases & Awareness

- EIS does not yet cover occupational diseases; BLA Schedule 3 is outdated.
- ILO & GIZ working to update list and train doctors; 100 factory staff trained, NOSHTRI to provide ongoing training.
- Yearly health checks and worker awareness are recommended.

4. CURRENT STATUS OF THE EIS: **BENEFIT**



4.7 Benefit Payments

General Framework & Data Collection

- Data collection estimates average medical costs, covering temporary incapacity, permanent disability, and survivors, with risk-pooling to ensure fair compensation.

Existing Benefits Design

- Lump-Sum Payment: Tk 2 lakh from Central Fund for death or permanent disability (BLA Section 215), usually via bank transfer; current amount is below ILO standards and does not consider age, dependents, or wages.
- Top-Up Payments: Added under EIS Pilot via brand agreements (not required by law).

Top-Up Monthly Benefits

- Approved cases go to EIS Sub-Committee; software calculates compensation with lump-sum deducted and remainder paid as monthly pension.
- Monthly pensions are given if over Tk 1000; otherwise, lifelong sum paid upfront, with dependents receiving lifelong or conditional benefits (e.g., widow until remarriage, children until adulthood).

Monthly Benefits in Death Cases

- Death Benefits: 40–60% of former wage, depending on number of dependents.
- Disability Benefits: Up to 60% of former wage, based on DIFE assessment.

4. CURRENT STATUS OF THE EIS: **BENEFIT**



4.7 Benefit Payments

Payment Procedure

- Beneficiaries notified via SMS/call; payments transferred to individual bank accounts.
- Minors' payments managed by guardians.

Beneficiary Experience

- **Permanent Total Disability:** Example – Tk 7,000/month vs former wage Tk 8,375; struggles with rent, food, medical costs.
- **Permanent Partial Disability:** Example – Tk 2,310/month vs former wage Tk 14,000–18,000; faces harsh work conditions, seeks higher compensation.
- **Workplace Death:** Family receives Tk 11,500/month (wife, son, parents); funds used for education and essentials, with concern for child's future
- **Commuting Accident:** Family receives Tk 4,000/month; payments delayed 4–5 months; wishes for higher support
- **On-Duty RTA:** Child gets Tk 8,000; parents/sister Tk 1,000 each; wife concerned about long-term support

4. CURRENT STATUS OF THE EIS: **BENEFIT**



4.7 Benefit Payments

Compliance with ILO Standards

- Benefits are provided regularly, but amounts may not cover the full loss of earnings or health needs
- Physical/vocational rehab services are insufficient
- EIS design aligns with ILO standards, but the benefits are poor compared to their cost (health, food, etc.)

5.8 Overall Observations and Gender-Sensitivity of the Scheme

Coverage Gaps & Medical Capacity

- EIS urgently needs to include occupational diseases, commuting accidents, and on-duty RTAs, as current focus is mainly on permanent disabilities and death.
- Training and capacity-building of medical institutions is essential, and the outdated disability assessment schedule needs revision to cover modern workplace injuries.

Rehabilitation & Return-to-Work

- Rehabilitation support and RTW provisions are missing; establishment of rehab centres and stakeholder training is crucial.

4. CURRENT STATUS OF THE EIS: **OVERALL**



4.8 Overall Observations and Gender-Sensitivity of the Scheme

Reporting & Claims Challenges

- Delays arise from document collection requirements, low reporting via LIMA, and factory owners' reluctance due to reputational risks.

Benefit Payments & Gender Sensitivity

- Payments are generally regular but often insufficient for sustainable livelihoods.
- Gender-specific issues exist (e.g., widow benefits ending on remarriage); future design should ensure gender-sensitive provisions for women workers and dependents.

5. PREPARATION OF FULL-FLEDGED WAGE-BASED EIS



5.1 *Providing Adequate Time for Implementation*

- EIS Pilot runs for 5 years (ends June 2027) to prepare institutions for nationwide coverage, with ILO & GIZ providing capacity-building, technical support, and ~USD 12 million funding
- **Safeguards** include the 5-year Pilot limit, voluntary yearly brand contributions, brand participation in monitoring, and active ILO governance
- **Risk:** Without a legal framework by 2027, top-up payments cease, and the scheme reverts to employer liability under the Labour Code

5.2 *Expansion to EPZs*

- Letter of Intent signed; benefits provided to EPZ RMG factories under same governance, with BEPZA reps joining the Sub-Committee
- Funding: RMG factories via brand contributions; EPZ factories via BEPZA's existing funds, which also process claims through the endorsement committee

5.3 *Replication in the Leather Industry*

- Leather & footwear sectors show interest in joining Pilot
- Expansion depends on confirming **buyer funding**
- Similar model as RMG Pilot; leather sector reps join case reviews

5. PREPARATION OF FULL-FLEDGED WAGE-BASED EIS



5.4 Potential Expansion to Other Sectors

- **Formal Sector**
 - Priority industries: **steel, transport, construction, ship breaking, cement** (high risk)
 - Safer industries (e.g., glass, chemical)
 - Need injury/casualty data for expansion
- **Informal Sector**
 - 85% of Bangladesh workforce informal → major inclusion challenges (registration, monitoring)
 - Difficult to bring into EIS due to lack of legal coverage under BLA
- **Nationalization of the Pilot**
 - **Goal:** EIS for **all workers, all industries**
 - **Challenges:** Small firms → low margins; large firms → huge worker numbers
 - Comprehensive worker database is essential for sustainability
- **Gradual Expansion**
 - ILO advises gradual inclusion post-pilot → begin with few sectors, expand over time
- **Role of the Government**
 - Sustainability of EIS schemes depends on long-term commitment from the government, social partners, and stakeholders, with the government playing a key role in nationalization
 - Previous government worked toward SDG 8 and National Social Security by 2026, but current political discourse creates uncertainty for timely national-level expansion

5. PREPARATION OF FULL-FLEDGED WAGE-BASED EIS



5.5 Awareness among Stakeholders: Numerous initiatives are ongoing by ILO, GIZ, BGMEA, BKMEA to raise awareness, such as -

- Through BGMEA/BKMEA/Brands: Brochures, posters, and training in 400 factories; brands like H&M trained 80+ union leaders.
- GIZ & ILO Initiatives: Reached 1,100+ factories, partnered with IndustriALL, NGOs, NCCWE; conducted webinars, union leader workshops, and theatre dramas to create awareness across all factory hierarchies.

5.6 Challenges in Awareness-Raising Initiatives

Issues related to Workers:

- Workers struggle to understand communication materials due to poor literacy and impatience with lengthy texts
- Early training by GIZ revealed workers demanding payments for past incidents, highlighting sensitivity in communication
- Animated videos are recommended to better educate workers, supported by EIS PSU or relevant authorities
- BGMEA and BKMEA inform GIZ about awareness initiatives, but workers' active involvement is uncertain
- Trade union finances are limited; development organizations currently lead awareness efforts
- Worker proactiveness is essential for sustaining awareness and scheme success

5. PREPARATION OF FULL-FLEDGED WAGE-BASED EIS



Issues related to Owners:

- Owners may lack awareness since EIS payments come from the Central Fund, not directly from them
- ILO cannot run mass campaigns due to risk of unrest among workers in other industries without benefits
- Some factory heads remain unaware despite training sessions for representatives
- Collaboration with BGMEA and BKMEA ongoing to improve awareness among all factory levels
- Full awareness and compliance remain challenging, though awareness is widespread among HR officers
- Long-term effectiveness of awareness efforts is questioned by some stakeholders

5.7 Legal Framework in line with ILS

EIS Pilot's **Framework** is built on the existing Bangladesh Labour Act (BLA). Such as –

- Chapter XII outlines employer liability for workplace injury compensation
- Compensation amounts defined by schedules: e.g., Fifth Schedule for death, First Schedule for permanent partial disablement
- Employers are responsible for the timely medical examinations of injured workers
- BLA provisions form the basis for testing EIS in the export-oriented RMG sector
- Schedule 1 lists injuries with percentage loss of earning capacity; Schedule 3 lists occupational diseases not yet covered by EIS
- Permanent disability often results in lifelong benefits; minor injuries are compensated for once
- Need to update schedules to fix inconsistencies and clarify beneficiary verification, especially for minor injuries

5. PREPARATION OF FULL-FLEDGED WAGE-BASED EIS



Amendment vs Establishment of New Law:

- Stakeholders largely favour amending the BLA to include EIS rather than creating a separate law
- Bangladesh's strong labour law makes amendment more feasible and less costly than establishing new institutions
- Some argue for an independent EIS law and institution; the final legal framework will be decided after further discussions

6. CHALLENGES OF THE EIS

Key challenges relate to accident reporting, claims processing, and information collection/verification are –

- Owners are often reluctant to report accidents due to reputational concerns
- Workers fear reporting accidents because of potential job termination
- Underreporting occurs through the LIMA system
- Claims processing is delayed due to underreporting and difficulties in document collection
- Verification of beneficiaries in death cases is problematic
- Communication with beneficiaries is hindered by emotional distress, network issues, language barriers, and health/age factors
- Lack of comprehensive and accurate accident data within factories and Central Fund applications delays case processing
- Accidents often misclassified or underreported, with death certificates frequently missing accurate causes
- Failure to file GD/FIR for accidental deaths impedes proper verification
- Missing or incorrect demographic and ID information complicates validation

7. RECOMMENDATIONS & WAY FORWARD



The following recommendations are based on stakeholder input and scheme analysis to aid expansion and nationalisation -

7.1 Legal Reforms

- Amend the Bangladesh Labour Act (BLA) to make the EIS mandatory for all businesses
- Customize Chapter XII of BLA to include EIS operations rules aligned with ILO Convention No 121
- Amend Section 80 of BLA for mandatory digital reporting of workplace and commuting accidents
- Introduce penalties for employers who refuse participation or delay contributions, as done in India and the Philippines

7. RECOMMENDATIONS & WAY FORWARD



7.2 Institutional Reforms

- Upgrade and legally mandate the existing institutional framework for the national scheme
- Ministry of Labour and Employment (MoLE) to serve as the legal guardian for monitoring and policymaking
- Establish the EIS Special Unit (EIS PSU) as the core operational institution under MoLE's supervision
- Set up regional and local offices for easier access and operations nationwide
- Create a centralized digital database accessible by EIS PSU, regional offices, and stakeholders
- Upgrade digital tools like Safety@Work app to support direct incident reporting
- Use the Central Fund for collecting employer contributions; contribution rate to be finalized post-Pilot
- Establish an official Medical Division with trained doctors for diagnosing occupational diseases
- Include rehabilitation and return-to-work facilities, leveraging existing centers and international collaboration
- Adopt multi-disciplinary rehabilitation approaches including occupational therapy, prosthetics, and vocational training

7. RECOMMENDATIONS & WAY FORWARD



7.3 Operational Mechanisms

- Introduce a mandatory registration process for businesses and workers in the national scheme
- Improve reporting via third-party audits alongside DIFE inspections
- Install secure complaint boxes in factories for confidential worker reports
- Allow flexible investigation policies for commuting accidents
- Provide regular medical checkups for workers in hazardous environments
- Mandate factory-level training with certification on OSH and EIS topics
- Extend benefit coverage to occupational diseases by updating BLA's Schedule 3
- Provide constant attendance allowance for total disablement pensioners requiring assistance

7. RECOMMENDATIONS & WAY FORWARD



7.4 Expansion of the Pilot

- Continue raising awareness using animated videos and other tools
- Train employers on contribution mechanisms; educate workers on disease symptoms for reporting
- Expand coverage to leather and footwear sectors with technical support for database preparation
- Prioritize inclusion of low-cost industries first, then high-cost sectors for smoother transition
- Increase government proactiveness in nationalizing the scheme and driving legal amendments
- Gradual inclusion of other industries in the national scheme over time

Thank you