

Conducting interview with migrant workers

An EJF guide to conducting interviews at PIPO centres - 2020 edition



This guide is designed to provide an overview of interview procedures and questions to use when conducting interviews with migrant or foreign workers to screen them for indicators of trafficked, debt bondage or forced labour. It draws on the International Labour Organisation (ILO)'s indicators of forced labour¹, field investigations and supply chain research undertaken independently by the Environmental Justice Foundation (EJF).

Since 2016 EJF has carried out in-depth observations and inspections of the Royal Thai Government's (RTG) initiatives aimed at tackling illegal, unreported, and unregulated (IUU) fishing and human trafficking in the Thai fishing industry. EJF has observed all stages of the monitoring, control, and surveillance (MCS) systems in place with visits to all 30 'Port In Port Out' (PIPO) centres, all three Thai Maritime Enforcement Command Centre (Thai-MECC) Area Commands, as well as witnessing multiple at-sea patrols conducted by the Royal Thai Navy (RTN), Department of Fisheries (DoF) and Department of Coastal and Marine Resources (DCMR). This guide seeks to address some of the concerns identified through these observations. Although this guide is directed primarily at migrant workers, many of the procedures and precautionary measures are applicable for interviews with Thai workers too.

Thailand has a network of 30 PIPO centres and 21 Forward Inspection Points (FIPs) across its 22 coastal provinces that are designed to conduct inspections of fishing vessels as they enter and leave port. All vessels over 30 gross tonnes must report to their provincial PIPO centre in order to receive authorisation to carry out any fishing trip. A full list of PIPO and FIP locations is available upon request. Since their installation in 2015, EJF and several other organisations have worked with the Royal Thai Government to address identified capacity gaps that have plagued the PIPO system and prevented these centres from operating as an effective monitoring, control and surveillance mechanism.

¹ International Labour Organisation (1 October 2012) ILO indicators of Forced Labour www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang-en/index.htm

COVID-19 precautions:

It should be noted that due to the ongoing novel Coronavirus (COVID-19) global pandemic that fisheries management regimes including PIPO vessel inspections and in-depth labour inspections including crew interviews have – understandably – been scaled back to minimise the chances of further infection of either fishing vessel crews or port officials. As the RTG and relevant agencies seek to normalise economic activities across the country including across the fishing industry it is vital that the safety and security of fishing crews, vessel operators and port officials is adequately maintained through rigorous anti-COVID-19 measures. These include ensuring the accurate dissemination of COVID-19 related materials; adequate provision of face masks, face shields and other forms of personal protective equipment; and social distancing protocols for port-side and at-sea vessel inspections.

Victim-Centred Approach:

In the context of Thai fisheries, EJF has long argued that the close intersection between IUU fishing and serious labour violations in Thailand's fishing industry requires a multi-stakeholder and interoperable approach that can solve capacity gaps across a wide spectrum of areas.² At the forefront of these reforms have been the introduction of systematic labour checks and interviews during port-side fishing vessel inspections, the rollout of digital and worker verification inspection tools at PIPO centres, and other measures on fisheries labour reforms.³

In order to improve the overall effectiveness of these measures it has become vitally important that labour officials employ a victim-centred approach when engaging with fisher workers. Such an approach increases the chances of workers feeling that they can trust officials and makes it more likely that they will speak freely about potential labour abuses or exploitation.

A victim-centred approach towards engaging with workers or interviewees can be defined as one that seeks to prioritise the needs and concerns of interviewees. It should seek to minimize discomfort or re-traumatisation for interviewees or potential victims through several critical aspects including building a rapport with interviewees, interview location, interview participants and questioning techniques.⁴ Labour inspectors should understand the unique situations that victims may find themselves in and appreciate that victim situations are rarely the same.

For example, if a child is found working onboard a fishing vessel, the questionnaire that labour inspectors use may not be the same as the questionnaire used for adult fishers. Such a practice is in line with the Thai prosecution legal codes. It can be seen clearly, for example, from the Prevention and Suppression of Human Trafficking Act, No.4, B.E. 2562 (2019) that the human trafficking offence may be committed regardless of a child's consent.^{5/6}

The three main elements of victim-centred approach that are given precedence by the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime (Bali Process) are as follows:⁷

- Take into account the individual of victims and tailor protection responses accordingly;
- Should be based on the fundamental consideration of safety, confidentiality and non-discrimination;
- Should be irrespective of whether the victim participates in the justice process.

Thai labour inspectors can employ 'soft skills' during interviews in order to empower interviewees or participants and build trust. Soft skills could include the ability to empathise with interviewees and enhanced communication and interaction techniques.

² Environmental Justice Foundation (2015) Pirates and Slaves — how overfishing in Thailand fuels human trafficking and the plundering of our oceans <https://ejfoundation.org/reports/pirates-and-slaves-how-overfishing-in-thailand-fuels-human-trafficking-and-the-plundering-of-our-oceans>

³ Environmental Justice Foundation (July 2019) Thailand's Road to Reform: Securing a sustainable, legal and ethical fishery <https://ejfoundation.org/reports/thailands-road-to-reform-securing-a-sustainable-legal-and-ethical-fishery>

⁴ U.S. Department of Justice (2015) Victim-Centred Approach www.ovcttac.gov/taskforceguide/eguide/1-understanding-human-trafficking/13-victim-centered-approach/

⁵ Council of State (2 February 2020) Prevention and Suppression of Human Trafficking Act, No.4, B.E. 2562 (2019) [http://web.krisdika.go.th/data/outsidedata/outside21/file/ANTI_HUMAN_TRAFFICKING_ACT,B.E._2551_\(2008\).pdf](http://web.krisdika.go.th/data/outsidedata/outside21/file/ANTI_HUMAN_TRAFFICKING_ACT,B.E._2551_(2008).pdf)

⁶ Article 52 para 3 of the Anti-Trafficking Act imposes punishment term of 8 to 20 years imprisonment and fine of THB800,000 to THB2,000,000 for child trafficking under the age of 15. Note that pursuant to Article 56/1 in the case of child trafficking under the age of 15 to carry out extremely dangerous work or service that has an effect on their body or mind, growth, or personal development; or to work in a dangerous environment, or to carry out immoral acts, the punishment term is not more than 4 years imprisonment and fine not more than THB400,000. However, there is an exemption to Article 56/1 where the court may elect not to punish the offender if the act was committed by parent(s) of the child due to intolerable poverty or other reasonable considerations.

⁷ Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime (1 October 2016) Enhancing a Victim-Centered Approach: Identification, Assistance, and Protection of Trafficking Victims in the Asia-Pacific https://www.baliprocess.net/UserFiles/baliprocess/File/RSO-CIFAL-curriculum%20Enhancing%20a%20Victim-Centered%20Approach_A4_Final_2017-02-14_for-web.pdf

Indicators of Human Trafficking & Forced or Debt Bonded Labour:

The identification of victims of human trafficking or forced and bonded labour can be assisted by being able to notice any one or more of the following indicators:

Human trafficking:⁸

EJF uses indicators in line with ILO and UN Convention guidelines which can be used to assess the situation of a potential victim of trafficking.^{9/10}

- Deception into work, conditions of work, content/length of contract
- Coercion or threatened into working in both the worker's origin country (OC) and Thailand¹¹
- Document confiscation during the transportation process and upon arrival in Thailand
- Debt bondage through transport, documentation, processing fees
- Dependency on exploiters/brokers upon arrival into Thailand. E.g.: Being forced to purchase food or water from a pre-determined individual or business
- Abuse of a worker's lack of education, language skills, information, illegal status in Thailand
- Exploitation through long hours, bad living conditions, low or no salary

Forced Labour:¹²

The ILO provides several indicators that are intended to help "front-line" criminal law enforcement officials, labour inspectors, trade union officers, NGO workers and others to identify persons who are possibly trapped in a forced labour situation, and who may require urgent assistance. These indicators represent the most common signs or "clues" that point to the possible existence of forced labour.¹³

- Abuse of vulnerability: Anyone can be a victim of forced labour. However, people who lack knowledge of the local language or laws, have few livelihood options, belong to a minority religious or ethnic group, have a disability or have other characteristics that set them apart from the majority population are especially vulnerable to abuse and more often found in forced labour.
- Deception: This relates to the failure to deliver what has been promised to the worker, either verbally or in writing.
- Restriction of movement: Forced labourers may be locked up and guarded to prevent them from escaping from their lodgings, place of work or while being transported.
- Isolation: Victims of forced labour are often isolated in remote locations and/or denied contact with the outside world.
- Physical and sexual violence: Forced labourers, their family members and close associates may be subjected to physical or sexual violence.
- Intimidation and threats: Victims of forced labour may suffer intimidation and threats to prevent them from complaining about their conditions or prevent them from quitting their jobs.
- Retention of identity documents: Retention by employers or brokers of identity documents or other valuable personal possessions is an element of forced labour if workers are unable to access these items on demand and/or if they feel that they cannot leave the job without risking their loss.
- Withholding of wages: Workers may be obliged to remain with an abusive employer while waiting for wages that are owed to them.
- Debt bondage: Forced labourers are often working in an attempt to pay off an incurred or sometimes even inherited debt.
- Abusive working and living conditions: Forced labour victims are likely to endure living and working conditions that workers would never freely accept.
- Excessive overtime: Forced labourers may be obliged to work excessive hours or days beyond the limits prescribed by national law or collective agreement.¹⁴

8 These indicators are adapted from ILO's (2009) Operational indicators of trafficking in human beings: <http://lft.ee/admin/upload/files/ILO%20indicators.pdf>

9 EU Together Against Trafficking in Human Beings (2009) Operational indicators of trafficking in human beings www.ec.europa.eu/anti-trafficking/publications/operational-indicators-trafficking-human-beings_en

10 Office of the United Nations High Commissioner for Human Rights (2000) Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime www.ohchr.org/en/professionalinterest/pages/protocoltraffickinginpersons.aspx

11 The origin country (OC) is the country from which a migrant worker comes from whereas a destination country (DC) is the country that the migrant worker is travelling to.

12 These indicators are adapted from ILO's (2005) Forced Labour Indicators: http://forcedlabour.org/?page_id=86

13 International Labour Organisation (1 October 2012) Indicators of Forced Labour www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm

14 International Labour Organisation (1 October 2012) Indicators of Forced Labour https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf



This interview taking place in Sichon should be commended for 1) taking place out of sight and out of earshot of the rest of the vessel inspection, 2) using a comfortable & private setting to make the crew feel safe and secure, 3) only allowing the DLPW inspector and translator to be present, and 4) taking a proportional sample of the crew to be interviewed.

Interview preparation:

It is important to make migrant workers feel safe and secure while conducting interviews. Interviews should only be carried out by trained officials and utilise certified, independent translators for communications with foreign workers. Interviewers should always acknowledge the vulnerability of migrant workers while planning and conducting interviews.

One of the requirements of the official PIPO Standard Operation Procedure (SOP) is the pre-inspection briefing. This has been introduced so that officials can discuss tactics and potential lines of enquiry before the inspection. EJF commends the introduction of this practice.

To enhance the investigative mindset of PIPO officials, EJF suggests that officials be asked to identify at least one issue with the vessel relevant to their jurisdiction. This could be a useful training exercise for officials as it improves their questioning abilities. Just before the end of the inspection, the team should hold a second de-briefing session to discuss the potential suspicions they have identified and decide what action should be taken.

Both these briefings should be conducted away from the vessel owner or captain to ensure that officials can discuss suspicions or concerns found during the inspection without feeling influenced or pressured by the vessel owner or other members of the senior crew.



During this post-inspection debrief in Pattani, the vessel owner (in the red circle) and vessel crew were in close proximity. This could adversely influence officials' abilities to freely report their concerns.

Inspection officials should try to identify signs and clues that workers are unhappy, uncomfortable, or unusually reserved during the overall vessel inspection. Workers may also exhibit physical signs of injury that may have been caused through physical abuse or self-harm.

Officials should select a proportional and random sample of the vessel crew for interviews. A single interviewee may be anxious about speaking out about potential infractions as s/he can easily be singled out by the captain and may face retribution. A sample of three to four crew members should be taken so that there is less concern as to being singled out as the informant.

Officials should take care that the vessel captain, foreman/net supervisor (chiev), and other senior crew are not included in any potential sample or interview process as they could skew interview results or potentially even intimidate the crew into not speaking out.

Once officials have identified possible interviewees they should separate them from the rest of the crew and especially from the vessel captain or anyone else connected to the vessel, pier, or indeed anyone not relevant to the interview. The interview should take place out of earshot (and ideally eyesight) of other individuals and in a comfortable, familiar environment. I.e. covered seating area or bed of the PIPO pickup truck. Note, carrying out interviews in small, enclosed rooms may prove intimidating for workers.

Officials tasked with interviewing workers should wear civilian clothes and avoid wearing uniforms that might give the impression of military or law enforcement. If officials are in uniform, they should explain the role of the Department of Labour Protection and Welfare (DLPW) and that it is a separate entity to law enforcement agencies.



DLPW interviewers (right hand side) are in official uniforms here which could be perceived by migrant workers as being associated with law enforcement agencies.



For this interview, DLPW officials took the important step of separating a sample of three crewmembers. However, unrelated uniformed officials were present along with a clerk from the pier company.

Even if interviewers or inspectors have longstanding existing relationships with workers, recurring interviews are still crucial in analysing living and working conditions. Inspectors should utilise their close relationships with workers to build trust and increase the likelihood that if a worker was abused, they would feel comfortable speaking about it.

The utmost care should be taken to increase the likelihood of gaining the trust of migrant workers. Interviewers should recognise that victims of trafficking may be afraid of law enforcement agencies and may feel uncomfortable disclosing their situation to them. They may be concerned that if they do speak out that they will face financial penalties, incarceration, and/or deportation.

It is important to acknowledge:

- Migrants may not speak the local language
- They may lack the basic social and legal protections that local workers receive
- In the event that they have been trafficked, they may be fearful of retribution for speaking out about their situation or how they were recruited

Workers may feel especially concerned about speaking out at a 'port out' because they may then face several weeks or months at-sea with little chance of rescue. To address these concerns, officials should clearly explain the purpose of the interview, and that if an issue is identified it can either be raised immediately or when the vessel returns to port. This should of course depend on the severity of the issue.

Officials should also assure interviewees that the information they disclose will remain confidential and they will not suffer any retaliation for their participation.

It should be noted that even if crew members are in possession of official identification documentation they may still be a victim of abuse or trafficking. In-depth interviews using certified translators should always be used alongside labour checks to identify cases of abuse or trafficking.

Interview preparation summary:

To help migrants feel they are in safe environment and to improve the chances of potential victims coming forward, labour and anti-trafficking agencies should ensure that:

- Interviewers are certified DLPW officials who were trained on advance course of victims of human trafficking and forced labour and have no connection to the company/vessel being inspected.
- Interviews are carried out in the worker's native language using a certified translator.
- Interviews are carried out separate from the rest of the vessel crew, captain, and unrelated individuals – out of sight and earshot.
- Interviewers should be aware of unrelated officials or other individuals listening in and must be ready to tell them to leave the area.
- Interview samples should include a proportional sample of the vessel crew to prevent 'whistle blowers' from being singled out.
- Interviewers clearly explain the purpose of the interview and confidentiality of the information.
- Interviewees are provided with chairs or other arrangements so that workers feel comfortable – for example utilising the PIPO centre's pickup truck as an interview location.
- Interviewers wear civilian clothes to avoid presenting themselves as military or law enforcement officers. If in uniform, DLPW officials should explain that they are a separate entity from law enforcement.

Important questions to ask:

The following is a list of potential questions that could be asked in an interview. It is important to note that many of these questions cover extremely sensitive topics and interviewers should make every effort to ensure workers feel safe and secure during the interview.

Interviewers should also only use these questions as a reference and should always seek to ask follow up questions if workers exhibit indicators or warning signs of forced labour or human trafficking.



Interviews like this are unlikely to yield useful results because: 1) It takes place too close to the rest of the inspection, 2) The interview is not out of sight or earshot of the rest of the crew, and 3) There is only one interviewee making it very easy to identify the whistleblower.

Recruitment and Hiring:

Migrant workers often rely on extended broker networks to find employment in Thailand. This is because of language barriers and lack of local contacts to access job markets. The more complex the network, the greater the chances for malpractice or abuse, especially with recruitment fees paid in workers' OCs and also upon arrival into Thailand. Brokers may also ask for a deposit or bond from their workers in order to limit their ability to terminate their work contracts early. Questions for migrant workers might include:

- What was the recruitment/hiring process from your OC through to Thailand?
- Do you know the name of the recruitment agency/broker(s) involved in hiring you?
- Did you have to pay a service or recruitment fee, deposit or bond of any kind to the recruitment agency/broker(s) during the hiring process? If yes, how much?
- How did you travel from your OC to Thailand? Did you have to pay for travel costs?
- Upon arrival into Thailand did you receive accommodation, an orientation, or a medical examination?
- Did you have to borrow any money to pay for any of the fees involved in recruitment? If yes, how much?
- Were you pressured or threatened in any way into accepting the job?

Employment contracts:

Employment contracts are most often a legal requirement by local labour regulations and are essential in providing rights protection to migrant and local workers alike. During inspections, officials should examine these contracts closely to determine that they are genuine and that they stipulate correctly the wage levels, and entitlements for the worker.

- In what language is the contract written and do you understand it?
- When you signed your contract, were the terms of employment explained to you? Do you understand these terms?
- Does the contract describe the process of contract termination, including minimum notice?
- When and where was the contract signed?
- Were you given a copy of the contract to read prior to signing and do you currently hold a copy of the signed contract?
- Were you pressured or threatened in any way into accepting the contract or any terms included in the contract?
- Does your contract explain overtime arrangements?
- How often do you have to work overtime? Is it always voluntary?
- Are you able to terminate your contract without penalty prior to the end of your contract? If yes, What is the required notice period?

Withholding documents & limiting freedom of movement:

The confiscation or withholding of migrant workers' personal documents is a form of coercion that has been reported in many fisheries by many organisations including EJF. It leaves migrant workers highly vulnerable to trafficking and labour abuse, effectively binding them to their employer or broker. It often means that workers are unable to leave their current job and means that they are vulnerable to deportation or detention by local police or immigration authorities. In many cases workers' documents will be held on-board the vessel, usually in a waterproof container. EJF understands this practice is done because documents could easily be lost during fishing trips and are expensive to replace. It is crucial, however, that workers know where these documents are kept, and is permitted to access and retrieve these documents whenever s/he wishes.

- Have you given original copies of your identification papers, work permits to your employer or broker? If yes, what did you submit?
- Are your documents being held for legal reasons or did you request that they hold them for you?

- Do you have free access to these documents? What is the procedure for retrieving these documents?
- Are there restrictions on your freedom of movement? Eg: when your fishing boat returns to port, or your working shift is finished.
- Do you live in a dormitory? If yes, are there restrictions on your movements? Is there a curfew?



The vessel foreman distributes worker IDs and seaman books.

Wages and electronic payment:

Workers are vulnerable to having their wages withheld or deducted from their initial recruitment deposit that they paid when they left their home country. All workers on-board fishing vessels are required to be paid at least once per month through using an electronic bank account. However, uptake amongst workers varies considerably across Thailand. It is therefore important to ascertain how workers are using the system and if there are any potential issues.

- Who pays money into your account?
- How are you paid? Hourly, daily, or on a catch-based rate?
- Are you paid on-time or at regular intervals?
- Which bank do you have your bank account with?
- How do you access the ATM?
- Do you know your PIN number? And does anyone else know your PIN?
- Have you ever had your wages or payments withheld?
- Do you any debts? If so, how much and what is the interest rate? Do you have a record of past/future payments?
- Do you receive a payslip? If yes, is it in a language that you understand?

Brokers have been known to demand interest on recruitment bonds, trapping workers in a cycle of debt bondage.

- Are any deductions made from your wages? If so, what? Eg: recruitment deposits, meals, transport, etc
- Does your employer or broker limit or restrict in any way how you use your wages?

Threats and violence in the workplace:

Threats of violence and physical or psychological abuses are means of exploiting and intimidating victims of human trafficking. Workers may suffer or witness abuse through disciplinary measures by a supervisor, employer, broker, or other employee. Abuse may also be used to frighten workers into accepting certain work conditions, contract terms, lack of freedoms, or living conditions. Interviewers should be aware that the following questions are extremely sensitive and that workers may be afraid to speak out or air their grievances about their supervisors or employer for fear of retaliation. Special care should be taken to assure workers that their answers will be kept confidential and secure.

- Have you ever been subjected to or witnessed verbal, psychological, physical, or sexual abuse/harassment?
- If yes, what happened, when and where did it happen, and who was involved?
- Are you aware of any procedures for dealing with harassment or abuse complaints in the workplace?
- Are you able to make complaints or grievances with your supervisor or employer?
- Is it possible to make these complaints anonymously?
- Do you feel that the process is effective?
- Are you free to join a trade union or has your employer tried to prevent you from joining?



A translator and DLPW official (hidden from view) interview three workers.

Living and working conditions on-board:

The Labour Protection in Sea Fishery Work Act B.E. 2562 (2019), Ministerial Regulation Concerning Labour Protection in the Sea Fishery Sector BE 2557 (2014) and 2018 amendment seeks to guarantee the basic rights of migrant fishers and raise health and safety standards across the Thai fishing fleet. For example, employers shall provide employees with a rest period of not less than 10 hours during a period of 24 hours, and not less than 77 hours during a period of seven days. Employers must provide evidence of these rest periods during vessel inspections.

- How many times do you set the fishing gears?
- How many hours does one fishing gear process take?
- How many hours do you get to rest on-board?
- How many meals do you receive per day?
- Have you or your colleagues ever received an injury from your time on-board the vessel?
- Do you know where medicines are kept on-board and how to use them?
- Where are lifejackets/preservers kept on-board the boat? Are there more than enough of them for all the crew? And do you know how to put it on?

Safety at-sea:

At the majority of PIPO inspections that EJF has observed, workers wear lifejackets. EJF acknowledges that this exercise may only be done for seemingly superficial reasons but it does serve several purposes including: 1) quickly showing inspectors that all crew have access to one, 2) that the crew know where they were located on-board the vessel, 3) showing that lifejackets are in a wearable state, and 4) that the crew know how to put them on.

This practice should be adopted during all PIPO inspections as it is a quick and effective method of ensuring that all crew on-board have access to life jackets. Life jackets should be inspected to make sure they are in good condition.

Inspectors should ensure that there are adequate food and water provisions on-board vessels before it 'ports out'. Inspectors should also verify that medicines are sufficient and that they are in good condition and within their expiry dates.

In addition, EJF strongly recommends that all fishers receive basic safety training before they are allowed to start work on-board any fishing vessel. They must be able to use all on-board safety equipment including first aid, life jackets, life preservers and fire extinguishers. This safety knowledge should be periodically verified during inspections.

EJF recommends the following critical procedures are carried out regardless of vessel risk category. Please note that these should take place alongside or in addition to the 15 existing PIPO inspection procedures:

Number	Procedure in order of importance
1	On-board inspection for stowaways/hidden crewmembers
2	On-board inspection for MTU check, food and water provisions
3	Interviews with proportion of the crew (typically 3-4 crewmembers)
4	Check that all crew have and know how to use lifejackets/life preservers and that these are fit for purpose.
5	Check that fire extinguishers are located in areas that are easily accessible and that they are fit for purpose.
6	Check all crew have and understand how to use bank accounts. Verify that these bank accounts have been used and updated in recent months.

In the event fishers are lost at-sea, PIPO centres must coordinate an investigation with THAI-MECC to establish the circumstances of the incident to determine whether the cause was accidental or not. This investigation should follow the guidelines set out in the IMO's Casualty Investigation Code.¹⁵

The DoF's new at-sea accident and 'man overboard' guidelines for vessel owners dictate that interviews must be conducted when the vessel returns to shore however these guidelines focus only on collecting key details of the incident and rescue effort and do not examine underlying issues or causes of the incident.

EJF understands that DLPW officials are present during such interviews at PIPO centres, however there are no clear protocols for their involvement nor are there official question guidelines that could help identify potential issues or underlying causes. EJF recommends that the DLPW introduce interview guidelines for accident and missing fisher cases with emphasis placed on questions that could facilitate identification of underlying issues on-board the vessel; i.e. living and working conditions or labour abuse.

In addition, interviews with the captain and all crewmembers should always be conducted individually, according to a victim-centred approach and always involve a DLPW official and certified translator. If there is adequate suspicion, then the multidisciplinary team and police inquiry officers should become involved.

A full incident report should be completed that lays out the factual information, analysis, actions to be taken and recommendations for mitigating similar incidents in the future. This should be based on the testimonials collected from the captain and crewmembers. For good practice examples of similar reports please consult the UK Marine Accident Investigation Branch's website.

For further information and guidance on EJF recommended procedures for such incidents please either consult EJF's full technical briefing available on our website or our specific fisher safety at-sea briefing which is available upon request.



A worrying spike in the number of fishers lost at-sea warrants urgent revisions to investigation protocols.

15 IMO (2008) Adoption of the code of the international standards and recommended practices for a safety investigation into a marine casualty or marine incident (Casualty investigation code) [http://www.imo.org/en/OurWork/MSAS/Casualties/Documents/Res.%20MSC.255\(84\)%20Casualty%20Investigation%20Code.pdf](http://www.imo.org/en/OurWork/MSAS/Casualties/Documents/Res.%20MSC.255(84)%20Casualty%20Investigation%20Code.pdf)