

To

The Hon'ble Chief Justice
High Court of Telangana
Hyderabad

Subject: Urgent provision of Medical Facilities at the Temporary Shelters instituted by the Government of Telangana

Respected Lordships

It is submitted that in the wake of the COVID 19 health emergency and the subsequent lockdown from 22-03-2020 thousands of migrant labour, homeless people, beggars and abandoned children have been collected from the road sides, bus stations and railways stations and other public places and put into various shelters in the twin cities of Secunderabad and Hyderabad. Stadiums, marriage function halls and other large areas have been converted overnight into temporary shelters to house the migrant people, homeless people and patients discharged from various hospitals.

Being members of the **Advocacy COVID 19 Lockdown Group**, some of us have been regularly visiting the shelters at West Marredpally and the Lalapet Stadium. It is submitted that we personally visited the temporary shelter at Lalapet Stadium on the evening of 3-04-2020 and found the following:

- a) The Lalapet Stadium shelter has about 200 inmates of which 30 are women and the rest are men. A majority of the inmates of the shelter are homeless people who were lying on the roads in the vicinity of Gandhi Hospital, women discharged after pregnancies with their new born children, male patients discharged after surgeries along with their attenders, beggars and migrant workers.
- b) The women who had just delivered were unable to sit on the floor. Another of the women had undergone an orthopedic surgery and she was also unable to sit on the ground. The staff at the shelter reported that the women who had delivered and the woman who had undergone surgery were sitting in chairs throughout the night as they couldn't lie on the floor. So was the case with the

men who had undergone orthopedic and other surgeries.

c) The men and the women complained that they were lying on the bare floor having spread their towels and lungis. They were not provided even with a bed sheet. There was no soap to wash themselves or detergent powder to wash their clothes and hence they were sitting there without a bath.

d) The women's room had mentally challenged women. The volunteers who were manning the shelter were repeatedly telling the mentally challenged woman to not to bite the other women inmates.

e) The staff manning the shelter informed that patients suffering HIV, TB and possibly COVID 19 were all put in the same room without any policy of isolation.

f) One of the men who appeared like a beggar was sitting in the stadium and looked visibly ill. The staff manning the Centre said that they were repeatedly requesting for ambulances to come and pick up the ill man but ambulances were not responding to their requests.

g) The staff manning the shelter said that they were insisting for a health screening of the inmates before they were deposited in the shelter. But no such precautions were being taken by the police or the GHMC and people were just being dumped in the shelter.

h) The staff also said that there is a necessity for a team of doctors to examine the inmates everyday as the inmates were complaining of different health issues and that the staff were feeling helpless in the face of these mounting complaints.

i) The staff also felt that the screening of the inmates at the entry itself will help in isolating the inmates accordingly.

j) That there has been a death in the shelter and the staff are unsure if it was due to COVID 19. That in spite of a postmortem being conducted, there was no information given to the volunteers and staff in the Shelter if that man had died because of the COVID 19 virus. The staff also informed that

there has been a death each in the temporary shelters at Malkajgiri and West Marredpally too and that there is no information given to the shelter about the cause of death.

k) The lack of screening and the complete absence of medical facilities in each of these is making the inmates and the staff manning the shelters extremely vulnerable to the virus.

2. It is submitted that following our visit on 3-04-2020 an appeal was sent out for cots and mattresses, bed sheets and men's and women's clothes. Immediately, on 4-04-2020, St Francis College Begumpet and Secunderabad and Vijay Marie Hospital Khairatabad arranged for 6 cots, bed sheets and clothes for the inmates of the shelter. Some other elders in the vicinity of Lalapet stadium have arranged for toothpaste, tooth brushes and soaps for the inmates. It is however submitted that this was done only for the Lalapet Shelter and that similar conditions are prevailing in the other temporary shelters too.

3. It is submitted that each of these shelters, including the Lalapet shelter, have no medical facilities and that people from all walks of life have been disparately clubbed together and housed in these shelters. In the context of the current pandemic such a clubbing without medical screening of the entry of inmates will have fatal consequences for the already existing inmates of the shelter which are numbering at about 200 in each of the shelters.

4. Further there are no doctors to even examine the inmates to see if any of them are infected. Some of the inmates were directly brought from Gandhi Hospital after being discharged from their respective surgeries and are at high risk and yet have not received any medical attention or treatment. Women and children and mentally challenged persons are all living in the same room due to lack of space. Despite the best efforts of the staff manning the shelters, social distancing is not being followed mainly due to lack of space in the shelters. The staff of the shelter even tried to bring local doctors from the locality to examine the inmates and the more serious ones among them but the doctors were reluctant to enter the shelter as most of the inmates appeared unhygienic and medically vulnerable.

5. In the circumstances we request your Hon'ble Self to kindly take note of these circumstances and treat this letter as a Suo moto public interest litigation and issue the follow directions to the Chief

Secretary of the State of Telangana

- a) To immediately arrange for a team of doctors in each of these temporary shelters
- b) to provide ambulances and to shift inmates who are ill to government hospitals;
- c) to conduct COVID 19 diagnostic tests upon each inmate at each of these temporary shelters;
- d) to inform the staff manning the temporary shelters about the cause of death of the inmates who had died in the last one week
- e) to arrange for the required measures of quarantine at each of the shelters and to pass such other order or orders as deemed fit and proper in the circumstances of the case.

Sincerely

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Sajaya Kakarla, Caring Citizens Collective

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