

NON-CREMATATION AND MASS BURIAL PRINCIPLES IN DISASTER MANAGEMENT OF HUMAN CORPSE

ING HOE LOH¹ AND CHONG JU LIAN^{2*}

¹*Curtin University of Technology, Miri 98009 Sarawak, Malaysia*

²*School of Marine and Environmental Sciences, University Malaysia Terengganu. 21030 Kuala Nerus, Malaysia*

*Corresponding author email address: julian@umt.edu.my

Abstract: Non-cremation and mass burial principles of a human corpse in the event of disaster have become a practice under international law. However, under the Malaysian National Security Council, Directive No. 20 Policy and Mechanism of National Disaster Relief and Management, which is the main legislation governing the disaster management in Malaysia, no guideline has been outlined regarding management of human corpse. This paper focuses on the international law related principles of non-cremation and mass burial of the human corpse. The qualitative methodology with analytical, historical and comparative approaches was used in this study. The result shows that the Directive No.20 focuses on the duty and obligation of government agencies when dealing with disaster management with principles of non-cremation and mass burial of human corpse not mentioned in the Directive. As such, new legislation governing the disaster management of human corpse should be introduced.

KEYWORDS: Non-cremation, mass, burial, National Disaster Relief and Management

Introduction

In the aftermath of the 2010 earthquake in Haiti which killed more than 200,000 people, lack of coordination resulted in human corpses being piled up outside morgues and hospitals, while thousands were buried without identification in mass graves (Irin, 2013). Without proper legislation and guideline to organize and manage human corpses, one's identity will be lost. Family members will suffer depression, emotional destruction and unable to get closure due to the uncertainty of whether their loved one is alive or dead. The practice of cremation is prohibited under international law except for hygiene reasons. And the mass burial of human corpse is only allowed under exceptional circumstances. However, the Haiti earthquake in 2010 and its alternative solution to the issue of the massive number of human corpses by burying them in massive graves without identifying the deceased had shown up the issue of lack of legislation which serves as a guideline to proper disposal of the human corpses with respect.

Even though Malaysia is located outside the Pacific Ring of Fire which means that it is relatively free from certain natural disasters

which commonly found in neighbouring countries such as typhoons and earthquakes, Malaysia is still vulnerable to other natural hazards which include floods, forest fires, tsunami, cyclonic storms, landslides, epidemics and haze. And with climate change, a natural disaster is unpredictable. The existing Malaysia legislation pertaining to disaster management, the National Security Council, Directive No. 20 Policy and Mechanism of National Disaster Relief and Management only focus on the coordination and regulation of government agencies when dealing with disaster. Most existing legislation related to disaster management focuses on land management, transportation and town planning. The only act which is applicable to the human corpse is the Infectious Disease Act 1988. Under Section 17 of the Infectious Disease Act, no human corpse shall be disposed without authorization from an authorized officer. Therefore, there is a need for the legislative body of Malaysia to introduce the Malaysian Disaster Management of Human Corpse Act, which a part of it should incorporate non-cremation and mass burial principles.

The lack of legislation in managing human corpse during a disaster has contributed to

human corpses being cremated and buried in massive graves. The unknown identity of those deceased has further caused the mental health of the survivors and caused chaos to the society. Even though Malaysia has yet to face a massive disaster, there is a need of new legislation in Malaysia pertaining to disaster management of human corpse, and the legislature shall include principles of non-cremation and mass burial of the human corpse. The research objective was to identify the lacuna of law in Malaysia related to non-cremation and mass burial principles in the disaster management of human corpse. The study is essential to improve the legislation related to disaster management of human corpse in Malaysia.

Non cremation and mass burial principles are crucial in the management of human corpse after a disaster. According to Morris (2007), the proper management of the dead body is a core component of disaster response, together with the rescue and care of survivors and the provision of essential services. Fahrudin *et al.* (2000) in their article "Disaster management and Post-disaster Social Services: The Need to Prepare Social Work Students to Practice in Disaster Setting" is of the opinion that literature review from the experience of various countries throughout the world supported the idea of post-disaster management and also suggested a range of helping roles and tasks for the social worker to help in managing the disaster. Brown *et al.* (2011) was of the opinion that good planning and coordination for response to disaster events is essential to minimize disruption. And Obonyo (2015) has pointed out the problem of a lack of an integrated and coordinated approach that relies on ad hoc measures to handle unexpected disasters.

The systematic and good coordination in managing disaster is important to ensure human corpse to be treated respectfully. The search of corpses, in situ identification of bodies, transfer of bodies, transfer to a facility serving as morgue, delivery of the body to family members, and assistance from local health authorities for the final disposal of the body in accordance with the wishes of the family, religious and cultural

norms of the community have to be done systematically to ease the pain of the family members.

According to the Disaster Preparedness and Response Training Module (2014), recovery means that the immediate needs of the disaster are addressed and the emergency phase ends, with the focus of the disaster efforts shifting to recovery. The recovery phase involves the actions taken to return the community to normal following a disaster. Actions during this phase include the repair, replace or rebuild of properties; as well as the proper management of dead bodies. The International Committee of the Red Cross advised against mass burials following disasters, as does the World Health Organization, reporting that the act can cause more harm than good. Rushing to bury the dead makes it harder for survivor and relatives to deal with the loss of loved one and without identification of the dead body, or knowledge of where it might have been buried, family members will not get closure. Nor can they perform the necessary funeral rituals according to their religious and cultural beliefs (Amber, 2013).

The cultural requirements and needs of the deceased's families should be taken into serious consideration. The process of mourning and burial or cremation is highly significant and emotional to the family members of the deceased. It is important that relief workers take time to adhere to the wishes and traditions of different groups within the affected population. A misunderstanding between aid personnel and families may result in unnecessary friction. Cemeteries or cremation facilities should be planned for and provided early on in an emergency, in consultation with family members of the deceased. Lack of acceptable funeral facilities and procedures may leave social issues unresolved and attribute to the overall grief of those involved, further increasing trauma to the family members, who are very possibly also survivors of the disaster. For example, in the aftermath of the 2010 earthquake in Haiti which killed more than 200,000 people, lack of coordination resulted in

human corpses being piled up outside morgues and hospitals, while thousands were buried unidentified in mass graves (IRIN, 2013). The lack of proper management in the event of a disaster and the lack of coordination in managing the human corpse directly affected the survivors' psychology and mental health. Taking into consideration of the psychosocial impact of the proper management of human corpse, the Pan American Health Organization in their guideline namely *Managing of Dead Bodies in Disaster Situation*, Disaster Manuals and Guidelines Series, No.5 (2009) raised their concern that the best efforts by experts continue to be counterbalanced by unacceptable practices in managing dead bodies in disaster situations due to lack of information and the persistence of deeply rooted and erroneous beliefs. Additionally, the lack of knowledge of some authorities regarding management of mass fatalities in disaster situations caused disorder and chaos at various stages of the expert study, such as the removal of bodies, processing the bodies in morgues and the registration and delivery of the bodies.

Therefore, it is important to have a proper burial of human corpse according to cultural requirements and the needs of the families of the deceased should be given priority over public concerns. The process of mourning and burial or cremation will be highly significant and emotional to the family and friends of the deceased (Peter *et al.*, 2002).

Materials and Methods

The qualitative methodology with analytical, historical and comparative approaches was used in this research. This study will focus on the international guidelines and practices on non-cremation and mass burial of human corpse principles in the event of disaster management of human corpse. It is hoped that the study will help the legislative body of Malaysia to draft disaster management of human corpse legislation based on the international guidelines and practices.

Results and Discussion

Malaysia Legislation on Non-Cremation and Mass Burial of Human Corpse in Disaster

National Security Council (NSC) Directive No.20 on The Policy and Mechanism on National Disaster and Relief Management (1997) is the only legislation for disaster management in Malaysia. It is complemented by other sectoral legislation and guidelines that form a disaster mitigation framework. The Directive prescribes the management mechanisms according to the level and complexity of disaster and determines the roles and responsibilities of various agencies to ensure effective coordination and mobilization of resources when handling disasters.

Article 4 of the National Security Council Directive No.20 outlined the purposes of disaster relief operations which include (1) mitigating the effects of various hazards, (2) preparing for measures that will preserve life and minimize damage to the environment, (3) responding during emergencies and provide assistance, and (4) establishing a recovery system to ensure the affected community's return to normalcy. The Directive No.20 has defined "disaster" as "an incident that occurs suddenly, is difficult in nature, destructive of property or environment and may cause loss of life and disrupt the daily activity of the local community. This includes natural disasters such as floods, landslides and technological disaster like factory explosions and fires (Art.5, Directive No.20).

Through this Directive, disaster management is controlled in accordance with the scale of disasters. The disaster management has been divided into levels. Level 1 Disaster refers to local incidents which are in control and do not have the potential to spread. Disasters at this level are not complex and only cause minimal damage to life and property. This form of disaster would not jeopardize local daily activities on a large scale. The District level Authority is capable of controlling such incidents through district-level agencies without or with limited assistance from outside.

Level 2 Disaster refers to more serious incidents, occurring over a wide area or exceeding two districts with a potential to spread. Disaster at this level possibly would cause death and damage to a large number of properties. Incidents at this level would also affect public daily activities. Being more complex than level 1, these disasters are difficult in terms of search and rescue. The State Level Authority is capable of controlling such incidents with or without limited help from outside. However, Level 3 Disaster refers to more complex incidents in nature and affects a wide area of more than two states. Such incidents could be handled by the Central Authority with or without foreign help (Art.13, Directive No.20).

To ensure disaster incident is managed according to its level, the Disaster Management and Relief Committee has formed the District Disaster Management and Relief Committee (JPBBD) for level I Disaster, State Disaster Management and Relief Committee (JPBBN) for level II Disaster, and Central Disaster Management and Relief Committee (JPBBP) for Level III Disaster (Art.14, Directive No.20). When a disaster is reported, JPBBP, JPBBN and JPBBD, where ever applicable, should take responsibility to evaluate the situation and decide the level and the scope of disaster; formulate an acting plan to overcome the disaster, decide the ability in overcoming the disaster; decide on the nature of assistance needed from higher level or outside; and hand over or takeover of disaster management based on evaluation of the incident (Art. 15(2), Directive No.20).

Officials must comply with the National Security Council Directive No.20 alongside other national legal framework which include Land Conservation Act, Environmental Quality Act 1974, Local Government Act 1976, Road, Drainage and Building Act, Occupational Safety and Health Act, Uniform Building By-Laws, Town and Country Planning Act 1976, Infectious Disease Act 1988, Road Transportation Act, Internal Security Act, Police Act, Criminal Procedure Act, and Fire and Safety Act (Roosli, 2012).

Section 17 of the Infectious Disease Act states that where a person has died of an infectious disease and an authorized officer has given direction as to the manner in which the corpse of such person is to be buried or cremated, no person shall bury or cremate such corpse otherwise than in accordance with the directions of the authorized officer. Section 17 of the Infectious Disease Act is applicable in disaster management of human corpse where no human corpse shall be disposed without authorization from an authorized officer. The other relevant legislation is mostly dealing with the management of disaster area, transportation, safety, government agencies, and general procedure. In Malaysia, the only specific law governing the disaster management in general is the National Security Council, Directive 20 on The Policy and Mechanism on National Disaster and Relief Management. However, non-cremation and mass burial principles have not been mentioned in the Directive.

The international treaty, declaration, protocol, guideline and principle related to non-cremation and mass burial principles can be referred to in order to draft new legislation that specifically governs the disaster management of human corpse. And for the purpose of this paper, the focus will be on non-cremation and mass burial principles which will form a part of the proposed legislation.

International Law related to Non-cremation and Mass Burial Principles

The sources of international law are enumerated in Article 38 of the Statute of the International Court of Justice with the four sources listed by Article 38 being: (a) international conventions or treaties establishing rules expressly recognized by the contesting states; (b) customary international law, as evidence of a general practice accepted as law; (c) the general principles of law recognized by civilized nations; and (d) judicial decisions and the teachings of the most highly qualified publicists of the various nations, as subsidiary means for the determination of rules of law.

There are some quasi sources of international law that have been suggested, however, none of them can stand in their own right as a new source of international law without relying on the established formal sources. One of the quasi sources of international law related to non-cremation and mass burial principles is soft law (Rahman & Amin, 2014).

Treaty

International humanitarian law is a set of rules of law which protect people who are not or are no longer participating in the hostilities and also to limit methods of warfare. International humanitarian law addresses the handling of corpses including the aspect of search, identification, and final disposal of human remains resulting from armed conflict. The relevant treaty and protocol related to non-cremation and mass burial of human corpse are the Convention (I) for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field (Convention I), Convention (ii) for the Amelioration of the Condition of Wounded, Sick and Shipwrecked Members of Armed Forces at Sea (Convention II), Convention (III) relative to the Treatment of Prisoner of War (Convention III), Convention (IV) relative to the protection of Civilian Persons in Time of War (Convention IV), Protocol (I) Additional to the Geneva Convention and relating to the Protection of Victims of International Armed Conflicts (Protocol I), and Protocol (II) Additional to the Geneva Conventions and relating to the Protection of Victims of Non-International Armed Conflicts (Protocol II). Additionally, the 1998 Comprehensive Agreement on Respect for Human Rights and the 1999 NATO Standardization Agreement also emphasized on the non-cremation and mass burial of the human corpse.

According to Article 15 of the Convention I, Article 118 of the Convention II, and Article 8 of the Protocol II, all the parties in an armed conflict...should, without delay, take all possible measures to seek and collect the dead, without distinction, and to treat them with respect and

dignity, avoiding plunder and the dispossession of the same. Article 20 of the Convention II and Article 120 of the Convention IV states that all the parties in armed conflict should take measures to identify the dead before burying them or burning them. Parties to the conflicts shall ensure that burial or cremation of the dead, carried out individually as far as circumstances permit, is preceded by a careful examination, if possible by a medical examination of the bodies, with a view to confirm the death, establishing identity of the deceased to enable a report to be made.

Article 17 of the Convention I, Article 120 of the Convention III, Article 130 of the Convention IV and Article 34 of Protocol I emphasized that bodies shall not be cremated except for imperative reasons of hygiene or for motives based on the religion of the deceased. In the case of cremation, the circumstances and reasons for cremation shall be stated in detail in the death certificate or on the authenticated list of the dead. In an armed conflict, it is necessary to bury or to burn honorably the dead and to respect their graves. People whose fatal remains cannot be delivered to their family members in armed conflict will be buried individually with all the graves will be marked. Only under exception situations, collective graves will be utilized. Article 19 of the Convention II and Article I of the Protocol I state that all the parties in an armed conflict have to do everything possible to provide information on the identity, the location, and the cause of the death of the deceased to the responsible authorities or to the deceased's relatives.

Customary International Humanitarian Law

Customary international humanitarian law is a body of unwritten rules of public international law, which govern conduct during armed conflict. Article 112 of Customary International Humanitarian Law urged each party to the conflict to take all possible measures to search for and to collect the dead. This includes permitting the search for and collection of the dead by humanitarian organizations. Article 113

has underlined the obligation to take all possible measures to prevent the dead from being despoiled or the prohibition of the despoliation of the dead. In addition, Article 114 states that the obligation of parties to facilitate the return of the remains of the dead to their families upon their request. As such, this obligation is in keeping with the requirement of respect for family life.

Article 115 emphasizes that the dead must be buried, if possible, according to the rites of the religion to which they belonged and that they may only be cremated under exceptional circumstances, such as imperative reasons of hygiene, on account of the religion of the deceased or in accordance with the expressed wish of the deceased. Burial should be in individual graves. Collective graves may only be used when circumstances do not permit the use of individual graves or, in case of burial of the prisoners of war or civilian internees, due to unavoidable circumstances which require the use of collective graves. Finally, Article 116 required each party to record all available information for identification purposes prior to disposal and to mark the location of the graves.

Soft law

As quasi sources of international law, Management of Dead Bodies in Disaster Situation, Disaster Manuals and Guidelines Series, No.5, Management of Dead Bodies After Disaster: A Field Manual for First Responders, and Disaster Victim Identification Guide have outlined the non-cremation and mass burial principles in human corpse management during disaster (Oliver et. al., 2009)

Chapter 2 Guidelines Series states that the final disposal of the corpse can be conducted by burial or interment, which is almost universally practiced. It might be necessary to preserve the dead body until it can be taken to the vigil or public viewing site or is finally disposed of. Various methods can be used to preserve the remains of victims, depending on the condition in which the corpse is found. It includes the use of low temperatures where the remains are kept

in containers that are refrigerated with ice or other systems; the use of chemical processes in which substances are injected intravenously or placed or injected into the cavities or other parts of the corpse; immersion in liquids; and burial.

All identified bodies should be released to relatives or their communities for disposal according to local customs and practices. Long-term storage will be required for any remaining unidentified bodies. Burial is the most practical method as it preserves evidence for future forensic investigation if required. Careful thought must be given to the location of any burial site. Soil condition, highest water table level, and available space must be considered. The burial site should be clearly marked and surrounded by a buffer zone that is at least 10m wide to allow planting of deep-rooted vegetation and to separate the site from inhabited areas (Chapter 8, First Responders).

Chapter 12 of the Disaster Victim Identification Guide directed that if no cooling capacities are available or obtainable, temporary graves can be dug to accommodate large numbers of victims as bodies remain cooler when stored underground. Burial trenches can be dug to accommodate large numbers of bodies and body parts. These trenches should be at least 1.5 metres deep and not located closer than 200 metres from the nearest drinking water sources with a gap of 40 cm should be left between individual corpses. In these trenches, corpses must not be stacked and the position of each body must be clearly marked.

Conclusion

Based on the treaties, customary international humanitarian law and soft laws, non-cremation of a human corpse is prohibited except for imperative reasons of hygiene and the body shall be returned to the family members for funeral purposes. Those whose fatal remains cannot be delivered to their family members will be buried individually and all the graves will be marked. Information such as the identity of the deceased, the location, and the cause of the death of the deceased have to be recorded. Only

under exceptional cases, collective graves shall be utilized. Therefore, in drafting the Malaysian disaster management of human corpse legislation, one crucial part of the legislation shall emphasize on the non-cremation and mass burial principles of the human corpse. Dignifying the human corpse is the final tribute the family members, as well as the society, can do to show our respect to the deceased.

Acknowledgements

The writers would like to express our gratitude to the Ministry of Higher Education. This research will not be able to be completed without the funding from Ministry of Higher Education Malaysia under the Research Acculturation Grant Scheme (RAGS)(Ref: RAGS/1/2015/SS10/UNISZA/02/1). It is hoped that this article will contribute to the development of disaster management of human corpse in Malaysia.

References

- Abas, A. (2012). *International Law*. Oxford University Press, Oxford. 737 pp.
- Ballera, J. E., Reyes, V. C., Sucaldito, M. N., Guzman, A.D., Sy, L. Jr., Zapanta, M. J., Avelino, F., Feliciano, J. & Tayag, E. (2015). Management of the Dead in Tacloban City after Typhoon Haiyan. *Western Pacific Surveillance and Response Journal*, 6(1), 44-47.
- Brown, C., Milke, M. & Seville, E. (2011). Disaster Waste Management: A Review Article. *International Journal of Integrated Waste Management, Science and Technology*, 31(6), 1085-1098.
- DCBA (Disaster Countermeasures Basic Act). (1997). National Land Agency. <http://www.adrc.asia/documents/law/DisasterCountermeasuresBasicAct.pdf>, [accessed 20 October 2018].
- Department of Health. (2007). National Policy on the Management of the Dead and Missing Persons during Emergencies and Disasters. *Department of Health, Philippines*, 17 pp.
- Centers for Disease Control and Prevention (CDC). (2014). *Disaster Preparedness and Response: Complete Course Module One, Two & Three. Facilitator Guide*, 1st edition. Centers for Disease Control and Prevention (CDC), Atlanta. 189 pp.
- Fahrudin, A., Baco, B.S., Abdul Malek, M.D. & Yusuf. M.H. (2000). Disaster management and post- disaster social services: the need to prepare social work students to practice in disaster setting. http://www.ums.edu.my/fksw/images/files/BIL7_8-2001-2002/Disaster%20Management%20And%20Post-Disaster%20Social%20Services.pdf, [accessed 16 August 2018].
- Frazer, J.G. (1974). *Myths of the origin of fire*. Hacker Art Book, New York. 238 pp.
- Geneva Convention (I) for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the field. <https://ihl-databases.icrc.org/applic/ihl/ihl.nsf/7c4d08d9b287a42141256739003e636b/fe20c3d903ce27e3c125641e004a92f3>, [accessed 16 August 2018].
- Geneva Convention (II) for the Amelioration of the Condition of Wounded, Sick and Shipwrecked Members of Armed Forces at Sea. <https://ihl-databases.icrc.org/applic/ihl/ihl.nsf/Treaty.xsp?documentId=2F5AA9B07AB61934C12563CD002D6B25&action=openDocument>, [accessed 16 August 2018].
- Geneva Convention (III) relative to the treatment of Prisoners of War. <https://ihl-databases.icrc.org/applic/ihl/ihl.nsf/Treaty.xsp?documentId=77CB9983BE01D004C12563CD002D6B3E&action=openDocument>, [accessed 16 August 2018].
- Geneva Convention (IV) relative to the protection of civilian persons in time of war. <https://ihl-databases.icrc.org/applic/ihl/ihl.nsf/Treaty.xsp?documentId=AE2D398352C5B028C12563CD002D6B5C&action=openDocument>, [accessed 16 August 2018].

- =openDocument, [accessed 16 August 2018].
- Harvey, P., Baghri, S. & Reed, B. (2002). *Emergency sanitation, assessment and programme design*. Loughborough University, Leicestershire. 380 pp.
- Henckaerts, J-M. & Doswald-Beck, L. (2009). *Customary International humanitarian law Vol 1: Rules*. Cambridge: Cambridge University Press, Cambridge. 689 pp.
- Hildebrandt, A. (2013). Mass burials may complicate Philippines Typhoon Haiyan recovery. <http://www.cbc.ca/news/world/mass-burials-may-complicate-philippines-typhoon-haiyan-recovery-1.2430868>, [accessed 16 August 2018].
- INTERPOL Disaster Victim Identification Guide (2014). <http://www.interpol.int/INTERPOL-expertise/Forensics/DVI>, [accessed 20 October 2018].
- IRIN (The Inside Story on Disasters). (2013). *Why dead body management matters*. <http://www.irinnews.org/report/96673/analysis-why-dead-body-management-matters>, [accessed 16 August 2018].
- Loh, I.H., Pauzai, N.A., Mat Zait, N.A.B. & Noor, S.N.H.B.M. (2016). Disaster Management of Human Corpse: Transformation of International Law into Municipal Law. *International Journal of Applied Business and Economic Research*, 14(12), 8691-8702.
- May, T. (2001). *Social Research: Issues, Methods and Process*, 2nd edition. Open University Press, Buckingham. 258 pp.
- National Security Council (NSC) Directive No.20, Malaysia. (1997). National Security Division, Prime Minister's Department, Kuala Lumpur. http://www.adrc.asia/management/MYS/Directives_National_Security_Council.html?Fr, [accessed 16 August 2018].
- Nazarov, E. (2011). Emergency response management in Japan. http://www.adrc.asia/aboutus/vrdata/finalreport/2011A_AZE_Emin_FRR.pdf, [accessed 16 August 2018].
- Obonyo, R. (2015). We do need a disaster management policy. <http://www.nation.co.ke/oped/Opinion/We-do-need-a-disaster-management-policy/-/440808/2715688/-/onstOe/-/index.html>, [accessed 16 August 2018].
- Oestigaard, T. (2005). Cremation and cosmogony – karma and soteriology. *Dhualagiri Journal of Sociology and Anthropology*, 1, 164-175.
- Oliver, M., Tidball-Binz, M. & van Alphen, D. (2009). *Management of dead bodies after disasters: a field manual for first responders*. Pan American Health Organization, Washington D.C. 58 pp.
- Pan American Health Organization. (2004). *Management of Dead Bodies in Disaster Situations. Disaster Manuals and Guidelines Series. No. 5*. Pan American Health Organization. Washington D.C. 194 pp.
- Pauzai, N.A., Makhtar, M., Chong, J.L. & Loh, I.H. (2017). Disaster Management of Human Corpse Act: From the legal practitioner's perspective. *International Journal of Applied Business and Economic Research*, 15(7), 117-125.
- Prevention and Control of Infectious Disease Act (1988). <http://www.bloomcomm.com/sites/ISAKOS-2017/supportLetters/SD.AP2.pdf>, [accessed 2 December 2018].
- Protocol (I) Additional to the Geneva Convention of 12 august 1949, and relating to the protection of victims of international armed conflicts (Protocol I). <https://ihl-databases.icrc.org/applic/ihl/ihl.nsf/Treaty.xsp?documentId=D9E6B6264D7723C3C12563CD002D6CE4&action=openDocument>, [accessed 16 August 2018].
- Protocol (II) Additional to the Geneva Convention of 12 august 1949, and

- relating to the protection of victims of non-international armed conflicts (Protocol II). <https://ihldatabases.icrc.org/applic/ihl/ihl.nsf/Treaty.xsp?documentId=AA0C5BCBA B5C4A85C12563CD002D6D09&action=openDocument>, [accessed 16 August 2018].
- Punch, K.F. (1998). *Introduction to Social Research Quantitative and Qualitative Approaches*. Sage Publications Ltd., London. 320 pp.
- Roosli, R. (2012). Learning and adaptation of disaster management and housing provision: the Malaysian experience. *Australian Journal of Emergency Management*, 27(3), 20-26.
- The Holy Bible. (2014). <https://www.lds.org/scriptures/nt/1-cor/15?lang=eng>, [accessed 16 August 2018].
- The Quran. (2016). <https://quran.com/>, [accessed 16 August 2018].
- Tidball-Binz, M. (2007). Managing the dead in catastrophes: Guiding Principles and Practical Recommendations for First Responders. *International Review of the Red Cross*, 89(866), 421-442.
- Webley, L. (2013). *Qualitative Approaches to Empirical Legal Research*. https://www.researchgate.net/publication/259339842_Chapter_38_Qualitative_Approaches_to_Empirical_Legal_Research, [accessed 18 October 2018].

