



ILO/EU Project to Support Implementation of National Action Plan on the Labour Sector of Bangladesh- Decent Work For All – Independent Final Evaluation>

QUICK FACTS

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Administrative Office: ILO Country Office Bangladesh (CO-Dhaka)

Technical Office: Decent Work Team, New Delhi

Evaluation manager: Ms. Ruchira Chandra

Evaluation consultant(s): Mr Ty Morrissey, Morrissey Consulting International

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BACKGROUND & CONTEXT

Summary of the project purpose, logic and structure

This final evaluation report details the results and findings of an independent final evaluation (IFE) of the *ILO/EU Project to Support the Implementation of the National Action Plan on the Labour Sector of Bangladesh- Decent Work For All*. The project’s implementation period was from January 2022 to December 2023 (with a no-cost extension between July 2023 and December 2023).

The European Union (EU) supported the project with a total budget of US\$ 1.7 million. The focus of the project was aimed at helping the Government of Bangladesh (GoB) accomplish the ILO Governing Body mandated *Roadmap* and the *National Action Plan on the Labour Sector of Bangladesh 2021 – 2026*).

During the EU-Bangladesh Joint Commission in October 2019, Bangladesh and the EU agreed to adopt a National Action Plan on labour rights with concrete timelines. Nine (9) key actions were identified as part of the NAP.

In early 2020, the Government submitted to the EU the first version of the Roadmap (the global pandemic in 2020 delayed the process after that). At the end of November 2020 and again in April 2021, the GoB submitted revised versions of the Roadmap to the EU. On 1 July 2021, the GoB proposed to the EU the final version of the Roadmap as “the NAP on the Labour Sector (2021-2026) of Bangladesh.” Currently, the implementation of the NAP comes into effect while the engagement continues between the EU and the GoB with technical inputs provided by the ILO. The Project delivered across four strategic areas, namely:

- **Strategic Area 1** - Enabling policy, legislative and institutional environment.
- **Strategic Area 2** - Credible labour administration institutions
- **Strategic Area 3** - Adequate and effective protection at work for all
- **Strategic Area 4** - Inclusive decent work and sustainable and competitive enterprises.

Present situation of the project

The project commenced implementation in January 2022 and completed implementation in December 2023. The project was funded by the European Union with a total budget on USD1,704,171. The project was initially scheduled to end on July 20-23 but was granted a no-cost extension for six-months to complete interventions. The focus of the project was aimed at helping the Government of Bangladesh (GoB) accomplish the ILO Governing Body mandated *Roadmap* and the *National Action Plan on the Labour Sector of Bangladesh 2021 – 2026*). The project is part of the ILO managed Labour Administration and Working Conditions (LAWC) cluster which is a new approach for the ILO aimed at consolidating resources and provided more efficient and effective support to achieve project outputs and outcomes.



Purpose, scope and clients of the evaluation	The primary purpose of the IFE is for accountability and enhanced learning and management of results. The findings will improve the implementation of relevant interventions in Bangladesh. Given the lack of available documents, reports, and individuals to interview, the evaluation was primarily theory-based. Interpretation needed to be made based on the available information provided.
Methodology of evaluation	The evaluation employed a primarily qualitative assessment with an initial desk review and key informant interviews with key stakeholders. A total of 21 people were interviewed (18 men and 3 women). All interviews were conducted virtually, and two group interviews were held with DIFE and BEF. Data was triangulated following interviews and cross-referenced with the data and information in the completed results framework. Further clarifications were sought from project staff to address any final gaps or issues.

MAIN FINDINGS & CONCLUSIONS	<p>Relevance</p> <p>The project is aligned with key national development frameworks, including (i) the 8th five-year plan of the Government of Bangladesh (2021 – 2025), (ii) the Outline perspective plan of Bangladesh 2021-2041, (iii) the National Skills Development Policy (NSDP) 2020; (iv) the National Jobs Strategy; and (v) the National child labour elimination policy (2012-2025).</p> <p>Consultations with counterparts through KIIs indicate strong partnership and engagement with the ILO. However, constituents needed to be made aware of the specific details of the project. Instead, perception focused on ILO support as a whole rather than specific components of the project and the source of donor support.</p> <p>Overall, the project does align with ILO interventions under the LAWC cluster, given the pilot nature of the work that has led to more significant interventions. Consultations with the EU indicate that the project aligns somewhat with their interventions but could have had better visibility. These issues are discussed in later sections.</p> <p>Validity of Design</p> <p>The project had a clear and logical design. The structuring of interventions around four SAs was a positive and proactive step that helped provide an operating framework under which the project could operate. The Description of Action (referred to as the ProDoc for consistency) contained a well-defined Theory of Change (ToC) narrative that helped explain how interventions would be structured and what results were anticipated. A ToC diagram would have allowed visibility, better utilisation, and understanding of how work would be implemented across the four SAs.</p> <p>Coherence</p>
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As indicated in the relevant section, the project aligned very well with other ILO-supported interventions and the work of the EU. However, the project needed to maintain high visibility given the structuring of personnel and focus. The impression is that the ILO was supporting a range of initiatives simultaneously that had the potential to duplicate and overlap. This reinforces the importance and need for a broad overarching strategy and narrative that then structures projects and interventions to focus on specific elements.

The Project has engaged with tripartite constituents and non-traditional partners within the GoB, CSOs, and academia. This includes working in the area of labour judiciary with the Ministry of Law, Justice and Parliamentary Affairs. It also means supporting a growing partnership with the Bangladesh Export Processing Zones Authority, as well as working with other CSOs

Effectiveness

The project has achieved and made solid progress towards defined outcomes and outputs. At the impact level, the project has reached its target of ratifying fundamental conventions in that GoB ratified all eight fundamental conventions with the support of the project. The ratification of all eight fundamental conventions is notable, demonstrating a solid commitment by the GoB to international labour standards. Results against outcomes include:

- **Outcome 1** Bangladesh policy, legislative and institutional environment for decent work is strengthened. Technical and political agreements have been made between the ILO and GoB under the NAP and Roadmap to align labour laws further (i. Bangladesh Labour Act, 2006; ii. Bangladesh Labour Rules, 2015; iii. EPZ Labour Act, 2019; iv. EPZ Labour Rules, 2022) with ILS. The bill has been sent back to the Parliament for correction, creating a window of opportunity for further alignment. Also, the GoB did not pass the law in November 2023. It is a matter of timing rather than lack of political will.
- **Outcome 2** - Their credibility is enhanced, and their action is based on social dialogue and tripartism. Tentative steps have been made to strengthen institutional work and response, mainly through establishing the case management system and supporting approaches to complaints. However, without a clear definition of what “success looks like”, it is hard to assess this outcome’s achievement fully.
- **Outcome 3** – Improved protection and safer working conditions. MoLE has updated the hazardous child labour list. The project engaged in high-level lobbying and advocacy, with the revised list being prepared in December 2021, which was later gazetted and published in April 2022. A National Child Labour Survey Report was Published in 2022. BBS conducted the establishment-based sector-wise survey for

five hazardous sectors, namely 1) Dry fish production, 2) informal/local tailoring and clothing, 3) manufacturing of leather footwear, 4) automobile workshop and 5) Welding work, for a detailed assessment of the situation of CL (Child Labour).

- **Outcome 4 - Inclusive decent work for sustainable and competitive enterprises is promoted.** Two new initiatives were launched to build the capacity of tripartite stakeholders to play an active role in workplace compliance for sustainable, gender-responsive and strategic management system development.

Efficiency

To assess this EQ, the report applied a Value for Money (VfM) approach that sought to determine the extent to which the project was managed in terms of management decisions, management of risk, and engagement in monitoring project activities/outputs to ensure the best possible outcomes. Consultations indicate that the project needed more human resources to implement the scope of work. There needed to be a designated team to drive implementation, and management and technical specialists were brought in from other projects.

The project had an NCE for six months. The NCE was likely arranged as work components were incomplete. Using technical specialists from other projects might be effective, but there is a risk of delayed timelines given their work commitments on existing activities.

Effectiveness of Management

There is a clear link between the project and the broader national programme supported under LAWC. Ideally, an overarching strategy would better reflect the integrated nature of the project and the programme overall.

The project remains relatively invisible to constituents. The ILO office refers to the “EU One” project, but this is relatively unknown to constituents. Interviewed social partners know ILO support but have limited visibility of where the funding is being sourced from or the broader nature and scope of work. Compounding the problem is that the project has no defined team. The coordinator role is a senior member of the ILO office involved with a wide range of activities.

Impact and sustainability

It is difficult to assess impact given the project's focus, its “pilot nature”, and its merging and combination of work with other interventions and projects. There is some evidence of work being adopted by MoLE. Specific examples include the acceptance of some revisions to the labour law (even though the formal law has yet to be passed), acceptance of changes required

to comply with Convention No. 138 on minimum age in work and Protocol 29 on forced labour.

It would have been helpful to have a clear transition strategy to position for work to transfer to the newly funded TEI and PROSHAR projects. A simple approach could have been to strengthen the M&E arrangements for the project to assess longer-term changes and overall contributions to longer-term outcomes. The output and process nature of work demonstrates that work is ongoing.

Cross-Cutting

These issues could have been better reflected and detailed in the ProDoc. Often, these theses are inherently integrated within broader portfolios of work (i.e. labour standards and social dialogue), but it is still essential to ensure they are addressed and discussed. Reference to gender is included but is often limited to participation rates for women in training. There does need to be a more concerted effort as to how women will benefit from interventions.

RECOMMENDATIONS, LESSONS LEARNED AND GOOD PRACTICES

Main findings & Conclusions

Recommendation 1: The project should have developed an overarching narrative to demonstrate how it contributes to longer-term priorities and differentiates itself from other ILO interventions. This is a suggestion for future reference, particularly as the ILO CO moves towards a cluster approach for projects and programmes.

Recommendation 2: Future projects should have a small, designated team of management and technical specialists devoted to implementation. Using specialists from other projects does not promote ownership of results and has implications for transparency and accountability. While resources may be saved, it is not beneficial for the donor and constituents as there is no key reference point for engagement.

Recommendation 3: Future projects should employ different approaches to support M&E. Using logframes and results frameworks focuses on the simple achievement of indicators, which often overlook the importance of outcomes and progression towards longer-term change. M&E should be strengthened to collect additional evidence, particularly of changes in work practices and broader institutional reforms.

Recommendation 4: Project interventions should focus on priority areas with strong political will and engagement. Simply funding projects and interventions that comply with the mandate of the ILO are only sometimes sustainable. Work should focus on areas where the government is willing to make changes, invest their funding and engage in a way that benefits employers and workers.



Recommendation 5: Performance indicators should be limited to priority statements that measure and assess change. Significant numbers of indicators do not support the narrative of change. Also, baselines should be established for all indicators and targets where possible. If a baseline cannot be determined, then the intervention should be questioned.

Recommendation 6: GEDSI strategies, targets and intervention should have high priority and visibility. Concerted efforts need to be employed to ensure GEDSI interventions are clear documented and supported and associated monitoring and evaluation arrangements are put in place that move beyond simple counting of participation. Evaluative efforts should be designed in a manner to capture the real impacts and outcomes of female involvement and participation.

Main lessons learned and good practices

The project has implemented good practices and identified key lessons learned. Good practices include:

- The ongoing amendment process for BLA, with political and technical consensus between the ILO and the GoB, is a positive step. The process employed demonstrates an ability to navigate complex issues and underscores the commitment to addressing key concerns outlined in NAP and CEACR recommendations.

Key Lessons include:

- Key Lesson 1: To enhance the M&E process, regular updates on the progress of legislative amendments, consultations, and ratifications should be documented and communicated transparently to all relevant stakeholders. In addition, feedback mechanisms should be established to incorporate constituents' input and adapt strategies as needed.
- Key Lesson 2: The target of passing the BLA amendment Bill by Parliament in 2023 demonstrates a clear timeline for achieving the desired outcome. The progress made until December 2022, with the bill in process and placed with the Labour Law Review Working Group, reflects a systematic approach to legislative reforms. The bill being sent back to Parliament for correction creates a window of opportunity for further alignment, which might be a strategic advantage. This period can be leveraged to address gaps and enhance the alignment with ILS. It's essential to capitalise on time effectively.
- Key Lesson 3: While the results highlight the activities and topics covered, it would be beneficial to include metrics or qualitative insights on how the capacity-building initiatives have translated into improved practices or contributions from worker organisations in relevant processes.