

Final Independent Cluster Evaluation --Improving Working Conditions in the Ready-Made Garment Sector Programme Phase 2 (RMGP II) and Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component

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This evaluation has been conducted according to ILO's evaluation policies and procedures. It has not been professionally edited, but has undergone quality control by the ILO Evaluation Office.

Acronyms

Accord	Bangladesh Accord on Fire and Building Safety
Alliance	Alliance for Bangladesh Workers Safety
BEF	Bangladesh Employers' Federation
BFSCD	Bangladesh Fire Service & Civil Defence
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BIDA	Bangladesh Investment Development Authority
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
BLA	Bangladesh Labour Act (2006, revised 2013)
BLR	Bangladesh Labour Rules (2015)
BUET	Bangladesh University of Engineering and Technology
BVV	Bureau Veritas Bangladesh
BWB	Better Work Bangladesh
CAP	Corrective Action Plan
CDA	Chittagong Development Authority
DEA	Detailed Engineering Assessment
DIFE	Department of Inspection for Factories and Establishments
DoL	Department of Labour
DWCP	Decent Work Country Programme
E&E	Efficiency and Effectiveness
EO	Evaluation Objective
EPZ	Export Promotion Zone
EQ	Evaluation Question
EQM	Evaluation Question Matrix
EU	European Union
FBCCI	Federation of Bangladesh Chambers of Commerce and Industry
FGD	Focus Group Discussion
GDPR	General Data Protection Regulation (of the EU)
GiZ	Gesellschaft für Internationale Zusammenarbeit (German word for Society for International Cooperation)
GoB	Government of Bangladesh
HRDD	Human Rights Due Diligence
IA	Implementation Agreement (of the ILO with the partners)
IBC	IndustriALL Bangladesh Council
ILO	International Labour Organisation
IPs	Implementing Partners
ISF	Industrial Safety Forum
ISU	Industrial Safety Unit
KfW	Kreditanstalt für Wiederaufbau – German word for Credit Institution for Reconstruction
KIIs	Key Informant Interviews
LDC	Least Developed Country
LI	Labour Inspector
LIMA	Labour Inspection Management Application
M&E	Monitoring and Evaluation
MHPW	Ministry of Housing and Public Works

MOLE	Ministry of Labour and Employment
MoWCA	Ministry of Women and Children's Affairs
MTE	Mid Term Evaluation
METI	Ministry of Economy, Trade and Industry, Japan
NCCWE	National Coordination Committee for Workers' Education
NGO	Non-Governmental Organisation
NOHSTRI	National Occupational Health and Safety Training Research Institute
NPA	National Plan of Action
NTPA	National Tripartite Plan of Action on Fire Safety and Structural Integrity in the Garment Sector of Bangladesh
OECD-DAC	Organisation for Economic Co-operation and Development-Development Assistance Committee
OSH	Occupational Safety and Health
OSS	One Stop Service
PC	Participation Committee
PCC	Programme Coordination Committee
PMO	Prime Minister's Office
PPP	Public Private Partnership
PSC	Programme Steering Committee
RAJUK	Rajdhani Unnayan Kartripakkha
RBC	Responsible Business Conduct
RCC	Remediation Coordination Cell
RMG	Ready-Made Garment
RMGP	Improving Working Conditions in Ready-Made Garment Industry programme
ROAP	Regional Office of Asia and Pacific (of the ILO)
RSC	RMG Sustainability Council
RTM	Remediation Tracking Module (of LIMA)
SDF	Sustainable Development Foundation
SDG	Sustainable Development Goals
SDIR	Social Dialogue and Industrial Relations (project of the ILO-Bangladesh)
SME	Small and Medium Enterprise
SOP	Standard Operating Procedure
TA	Technical Assistance
ToC	Theory of Change
ToR	Terms of Reference
UN	United Nations
UNEG	United Nations Evaluation Group
UNICEF	United Nations Children Fund
UNSDCF	UN Sustainable Development Co-operation Framework
UN SWAP	United Nations System-wide Action Plan on Gender Equality and the Empowerment of Women
WRC	Workers Resource Centre

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Executive Summary

Programme design

The Tazreen and Rana Plaza disasters promoted a major effort to improve working conditions in Bangladesh. The International Labour Organisation (ILO) along with the Government, employers, workers implemented a programme— Improving working conditions in the ready-made garments sector in Bangladesh (RMGP) first phase from October 2013 to June 2017. Over the course of the first phase, the programme made a significant contribution as RMG factories were inspected, various standards harmonized, the labour inspectorate reformed, and progress made to establish a culture of Occupation Safety and Health (OSH). The first phase also supported Rana Plaza survivors to re-enter the workforce. In its second phase (July 2017 to June 2023), the development objective of the RMGP II programme was to ensure safe and decent working conditions contributing to improved competitiveness in the garment and other sectors in Bangladesh. RMGP II interventions focused on strengthening factory safety through remediation, labour inspection reforms and OSH in policy and practice. Strategic expansion of Better Work in Bangladesh (BWB) was also a key component of RMGP II interventions in Bangladesh.

Evaluation design

The ILO commissioned a final cluster evaluation of RMGP II, herein after also called a programme, conducted by a team of four evaluators. The purpose of the evaluation was:

- Review the **overall achievements** of the RMGP II and BWB in terms of outputs and outcomes
- Examine **relevance, design, efficiency, effectiveness, impact, and sustainability** of RMGP II and BWB, including programme contributions to cross-cutting issues related to gender equality, non-discrimination, social justice, and environmental sustainability
- Assess how **management and governance arrangements** were appropriate, and how cross-cutting issues were addressed
- Identify the **main difficulties, constraints and distil best practices, lessons**, and insights from implementing the cluster of projects (RMGP II and BWB) in Bangladesh
- Provide **practical recommendations** that can inform future reforms in industrial safety, labour inspections and workers welfare in RMG sector and beyond in Bangladesh

The primary end users of the evaluation findings are the programme management team and the ILO Country Office in Dhaka, the donors (Canada, Netherlands, Japan, UK), ILO's constituents, ILO technical and collaborating departments and in-country partners and stakeholders. The evaluation gathered evidence to assess the OECD/DAC parameters - relevance, design, efficiency, effectiveness, impact, sustainability, and management arrangement of the project. While doing so, the evaluation integrated gender equality, normative and tripartite mandate, and environmental sustainability as a cross-cutting concern throughout the analysis. A detailed set of evaluation questions and assessment methods used is described in the Evaluation Question Matrix (EQM) at Annex 1. The evaluation was conducted through a consultative and participatory process through online and in-person discussions. The evaluation reviewed the programme documents and conducted about 60 key informant interviews and focus group discussions involving 100+ ILO tripartite constituency partners from Government, Employers and Workers. The evaluation followed a utilisation focussed methodology that responds to both accountability and learning concerns of the ILO tripartite constituency. The evaluation was scope and time-bound and its limitations are highlighted in the section 2.5. The evaluation was conducted and completed during April to June 2023.

Evaluation findings

Relevance:

The programme interventions were highly relevant with the situation, needs and safety priorities of RMG sector. The programme contributes directly to implementation of the National Tripartite Plan of Action on Fire Safety and Structural Integrity in the garment Sector of Bangladesh (NTPA). RMGP II also aligns with other important national strategy documents such as the Decent Work Country Programme (2022-2026), specifically DWCP Outcome 1. The programme is consistent with ILO's mainstreaming strategy on gender equality. The programme design has a very clear gender focus. The programme is pertinent to stakeholders' (MOLE/DIFE, BFSCD, employers' and workers' organizations) requirements and policies of partners and donors and the continuing needs for reform of the RMG sector in Bangladesh. Within the changing context due to socio-economic impact of Covid-19, the programme became even more relevant as it provided support to the factories to improve their standing on safety and social compliances so as to remain relevant and attractive to international buyers. The programme facilitated and oversaw a well-managed transition to Accord and Alliance into nationally registered initiatives called RSC and Nirapon. A clear degree of separation was achieved among these initiatives, in terms of factory coverage.

Design:

The programme conceptualised an intervention design that is plausible and coherent to bring about RMG sector reforms. The programme focused on addressing challenges at different levels, such as policy/regulatory, sector/industry, factory, and worker levels through various initiatives. In addition to BWB, the RMGP II also worked with another ILO initiative in the country called Social Dialogue and Industrial Relations (SDIR) Project. In theory, a set of country programmes (RMGP II including BWB and SDIR (including Workers Resource Centre -WRC) were highly complementary to each other, in practice, this complementariness was only partially realised as these have different resources, teams and priorities. There was some overlap of factories e.g., SDIR worked with certain number of NI factories (not all). It is likely that SDIR and WRC interventions was needed for all NI factories. It is also likely that BW interventions would have gained from SDIR and WRC approaches. But without a tightly knit sector-wide portfolio of programmes, this may have been a missed opportunity.

The programme examined the root causes of gender inequality and focused its interventions to promote gender equality and women's empowerment at DIFE, BFSCD and other constituents of the programme. Sex-disaggregated data was utilized, and innovative and women empowerment-oriented interventions were designed (and implemented) in factories of different initiatives, e.g., BWB's Mothers@Work and GEAR initiative for leadership promotion of women. The programme identified and understood risks well, implementing preventive and proactive response mechanisms. The COVID-19 pandemic caused significant disruptions, leading to a shift in the programme's approach from field-based to desk-based operations. The programme also faced the challenge of a withdrawal of financial support from one of the donors, briefly impacting its progress and implementation capacity. Given a range of initiatives (DIFE-NI, RSC, BW, Nirapon, BIDA-FBCCI), linkages and opportunities of learning from each other were less realised during RMGP II. Also, some dissonance was observed in the way factories in Export Promotion Zone (EPZ) follows a set of rules than those outside EPZ, which comes under BLA.

Efficiency:

The programme achieved 'right' allocations across different strategic areas, including on gender aspects. The actual spending up to May 2023 closely matched with the projections made in 2017 in the ProDoc. Remediation (strategic area 1) accounted for 31% of the spending, which was outsourced to a private firm (cost-intensive) to ensure technical expertise and capacity development within the responsible government agencies. The remaining

strategic areas (SA 2 to 4) received approximately 10% of the total spending, wherein most of the activities involved policy development and training, which were covered by staff costs (37%) and programme support costs (10%). Although there is no specific data on gender budgeting, the programme integrated gender considerations into all its activities. It can be safely assumed that gender budgeting was adequate and flexibly available to the programme team based on emerging requirements. The programme has delivered a good 'value for money' overall but could have done better on 'equity'. The programme's work with 1549 NI factories (which have several tier 2 factories) demonstrate certain level of 'equity' in its work even though there are large number (at least 1000+) other small and medium RMG factories which are still not covered by any initiative.

Effectiveness:

The programme made significant progress across all strategic areas and achieved most of the logframe targets, though a few cases of shortfall remained. In Strategic Area 1 (ensuring factory safety through remediation), the programme aimed to 100% remediate all active factories (658) of the target 1,549 NI factories. The progress is lower than the target as 54% of original non-compliances have been remediated in 658 active factories. This progress is driven by good progress (79%) achieved in Category (Cat) 1 factories. The progress in Cat 2 and 3 factories is much lower and is a point of concern, for example, 55% of active factories have achieved less than 50% progress on remediation. Establishment of an Industrial Safety Unit (ISU) to replace RCC is another significant achievement. ISU will now monitor safety aspects in all industrial units. The programme has also supported development of LIMA 2.0, which is expected to address the causes of data scarcity in the Remediation Tracking Module (RTM).

In Strategic Area 2 (labour inspection governance), the programme supported a cross-departmental initiative of One Stop Service (OSS) which was established and was made operational during this phase of the programme. Several Government departments (DIFE, CDA, RAJUK, BFSCD) linked their online systems with the BIDA's OSS. Further, a process simplification was carried out through one form for five services for ease of doing business in Bangladesh. Currently, 60% of licensing by the RMG factories are being obtained online, including through OSS.

In Strategic Area 3 (OSH), significant achievements are reported in national OSH profile and policy documents. There have also been efforts on making OSH as Fundamental Rights. Capacity building of industry bodies (FBCCI safety cell, BGMEA, BKMEA), trade unions and employers' representatives have been carried out. While policy and factory level improvements are well evident, there seems to be lack of data on how trained safety committees are more effective than those not trained. More importantly, how safety committees have improved OSH compliances at factory and how awareness and action at worker level have improved their well-being. The outcome study observes that in the case of licensing and use of complaint reporting online, there is still scope for improvement. Also, online system for accident and injury reporting is rarely used.

In Strategic Area 4 (BWB expansion), BWB has expanded to 441 factories (up to March 2023), employing 1,273,646 workers, 50% of whom are women. BWB is working with 321 Participation Committees (PCs), 284 SCs. 646,247 workers (56 percent women) elected 3,504 PC representatives. 47% women elected as PC representatives. An assessment of functionality and effectiveness of SCs, as per the outcome study, indicate a considerable scope for improvement. Clearly, a detailed assessment of functionality and effectiveness of PCs and trade union would be needed. BWB revenue model already shows 56% cost recovery, with assessment report subscription by brand partners standing at 385, with 30 buyers /brands affiliated with BWB. 103 factories have been guided to develop maternity rights and breastfeeding policy in line with national laws and international labour standards. 625 female machine operators have been provided with training to capacitate them for career progression, of whom 395 (63%) have been successfully promoted to supervisory positions. 191 Master

Trainers- comprising 30 officials from Department of Labour and 161 from employer and worker organizations- have so far been developed through Learning Hub. Towards building sustainability and ownership of factories in areas of compliance, Better Work has so far trained 121 Welfare Officers from 114 factories, and developed 166 Factory Ambassadors from 87 factories, who are now acting as change agents in the pursuit of compliance in their respective factories. BWB is organising consultations with national stakeholders for a better Human Rights and Due Diligence (HRDD) framework and its applications among the industry partners. BWB has also unveiled a new factory engagement framework transferring ownership to industry stakeholders and BWB taking the role of convenor. If the BWB becomes the convenor, then the structural modalities of delivering the advisory support would drastically change. This is being worked out.

At the macro level, the programme effectively engaged and empowered partners though they would need continued support e.g., DIFE though considerably strengthened would continue to need support as it's capacities and resources are still limited for the mandate entrusted to them. DIFE still looks up to the ILO for continued support on capacity building, equipment, and other resources. Similarly, OSS still have many gaps in technology, people and processes requiring continued programme support in the designated areas. At the meso level, the programme partnered with industry associations (BGMEA, BKMEA, BEF) to support their member organisations towards improved safety culture, however, follow on monitoring and support is needed to ensure that improved capacities lead to improved behaviours and mindset change among factory owners and managers. At the micro level, the assumption that combined effects of different initiatives (RMGP II, SDIR, WRC, BW) will ensure effective participation of workers organisations (safety committees, trade unions, participation committees) at factory level has not turned out to be completely valid. A gap remained on this respect.

Impact:

The RMG sector in Bangladesh has undergone significant improvements in compliance, competitiveness, and forward-looking practices. These changes have been supported by regulatory /legal reforms, such as remediation frameworks, enhanced labour inspections, strengthened OSH regulations. These reforms, coupled with factory-level interventions, have contributed to a culture of compliance at the enterprise level, leading to the sector's progress and its economic contribution to the national economy. Bangladesh has become the second-largest apparel exporter globally, with substantial growth in apparel export earnings. The sector's export values have steadily increased, and it now accounts for 81.2% of the country's total export income. The European Union (EU), the United States (US), and the UK are the main export markets, facilitated by duty-free and quota-free access. However, as Bangladesh transitions from a Least Developed Country (LDC) to a developing country, safety and social compliances will become crucial in negotiating preferential market access agreements.

The impact of the RMG sector regulatory reforms extends to enterprises, social partners, and workers. The remediation requirements and protocols have compelled factories to improve compliance and safety measures, leading to investments in safety infrastructure. Studies show that the RMG sector's progress aligns with several Sustainable Development Goals (SDGs), particularly those related to employment, labour rights, secure working environments, and institutional transparency. BWB member factories have demonstrated higher hourly wages, improved maternity leave provisions, and faster export revenue and volume growth compared to non-BWB factories. The formation of trade unions and participation committees has also improved workers' conditions and reduced harassment.

Despite these achievements, the RMG sector still has considerable ground to cover to achieve accident-free and decent work status, particularly among large medium-sized factories. Small and Medium Enterprise (SME) factories have witnessed diverse types of accidents, including electrical and structural incidents, indicating the need for further safety measures. SMEs face

financial constraints in establishing a safety culture and ensuring employee participation. While the sector has become safer overall, social compliances are limited to some BW factories, and there is a need to broad base this social compliance progress to more SMEs. These would include SME factories currently supported by DIFE, RSC and Nirapon and will also include factories (expected to be 1000+) which are currently not supported by any initiative. The compliance ambit also needs to be broadened to include some critical aspects of environmental compliances.

In summary, the RMG sector in Bangladesh has made noteworthy progress in compliance, safety, and social issues through regulatory reforms and programme interventions with industry bodies and with the factories. This progress has contributed to the sector's economic growth and to the country's preparation for transitioning to a developing country status. However, challenges remain, particularly in ensuring safety compliances among SMEs and expanding beyond safety to social (and subsequently environmental) compliances across the sector.

Sustainability:

The long-term viability and continuity of the programme results depends on the sustained motivation of all stakeholders. If all tri-partite stakeholders collaborate, the results of the programme can be maintained and even enhanced. The interventions that are likely to be sustained beyond RMGP II include continued remediation actions, implying a continued decrease in the number of factories with severe safety risks and hazards. A higher level of compliance (on safety and social compliance related labour standards) can be expected at least from medium and large factories. As the government continues to demonstrate commitment to industrial safety, compliance with labour standards, and labour governance, there is a greater probability that the programme's results will be sustained. However, sustainability is not guaranteed automatically as it will require effective implementation of national policies, regulations, and frameworks by the GoB as well as by other ongoing initiatives. Since sustainability of RMGP II results are closely associated with 'institutionalisation', the evaluation has analysed sustainability through 'institutionalisation' lens. To this end, we have used a '4-I' framework of institutionalisation ('Intuiting', 'Interpreting', 'Integrating', and 'Institutionalising'), developed by Crossan, Lane, and White (1999), and used by CPD (2021). Over the last decade, RMGP I and II have made significant progress in institutionalisation by achieving Step 3 (Integrating) of the institutionalisation framework. Next and the final step of 'Institutionalising' is not fully achieved yet by June 2023 (end of RMGP II). The RMG sector have made significant strides in terms of SOPs, code of conduct, manuals, tools, and capacities and so the sector is well-placed to achieve Step-4 of '4-I' institutionalisation framework. To go there, a few milestones would need to be crossed, such as a) a stronger institutional structure of ISU is needed, b) ISU need to more-clearly identify its role under the BLA and explore ways of complementing this role by collaboration with other govt departments and private sector initiatives for building safety across RMG (and other sectors), c) greater institutional coordination and sharing (e.g., LIMA and OSS become guiding force) is needed, d) greater linkages between different initiatives, e) successful transfer of roles to industry bodies by BWB, f) institutionalising ISF, g) remediation finance redesign and pilot /scale up, and finally enhanced sector-wise awareness and knowledge sharing.

On the directive of the Prime Minister's Office (PMO), the Federation of Bangladesh Chambers of Commerce and Industry (FBCCI), along with BIDA has carried out a joint survey cum inspections of 5206 non-RMG factories. This BIDA-Industry partnership shows the way for reforms to be scaled up and replicated within and beyond the RMG sector.

Effectiveness of management arrangement:

Operating with a dedicated teams for RMGP II and BW, composition of staffing was appropriate for the skillsets required. There were some international staff members but over time, some of these were replaced with nationals. While reducing staff costs, this approach

worked in terms of creating in-country capacities. There was just once exception in terms of perceived workload. The role of advisor in BW has come in for a scrutiny as each advisor is allocated about 18 factories. BW have 29 advisors and is now recruiting consultants to do the assessment to ease the workload of advisors.

The programme formed a tripartite Project Steering Committee (PSC) to provide governance strategic oversight to the implementation of RMGP II. This was a good structure as most of the engaged Ministries of the GoB were involved, along with other constituents of the tripartite. However, the representation of the workers /workers organisations in the PSC was considerably lower in the second phase of the programme. This may be due to the fact RMGP II was focussing on the regulation and policy level and was engaged in strengthening the Government capacity. Nonetheless, this limitation is notable as more engaged workers organisations are important for the ILO's tripartite mandate, irrespective of the focus of programme interventions.

The programme had a well-functioning M&E system that monitored output and outcome indicators of programme Logframe /Results Framework. The strength of the programme M&E system lies in the fact that a clear picture of progress is available on most of the output and outcome indicators. Despite robust systems in place at RMGP II (including STAR system of BW), the M&E system could not capture, or document data related to training outcomes (beyond participant satisfaction surveys). Similarly, though BGMEA, BKMEA, RMGP II supported a range of capacity building interventions on OSH, safety committee, participation committee for 400+ factories. However, performance and impact of these trainings were not assessed, and no data is evidently available in terms of adoption of OSH, functionality of safety committee and participation committees.

Cross-cutting issues – gender, tripartite normative mandate, and environment

A range of 'gender integration' initiatives across different institutions (DIFE, BFSCD) and levels (Govt, industry association, factories, and workers) have been undertaken. DIFE has developed a gender road map (2021-2030) that identifies key areas of work and proposes strategic directions for its work on gender mainstreaming. Awareness levels and several other advocacy campaigns are being organised for the ILO Convention C190's ratification. BWB's transformative action projects (mother@work, GEAR) can usher in systemic changes. These initiatives for stakeholders and workers enhance knowledge, capacity, and responsible business conduct. It is clear that the BW component of the programme has contributed to the creation of a secure and healthy working environment for women, as well as achieve some success in increasing the number of women in leadership positions within the sector. The RMG sector still faces challenges such as wage discrimination, access to maternity benefits, availability of mandatory daycare and breastfeeding corners, enforcement of hygiene facilities, effective complaint mechanism and monitoring system, active anti-harassment committees, career advancement for women, mindset (stereotypical roles, mentally pressuring environment) etc. Clearly lot more is needed in terms of change in systems, cultures, and norms. This will take time and persistent efforts.

The real change on the ground as per the theory of change happens through constant tripartite engagement and actions. Tripartite collaboration in the programme was skewed towards government as per the design of Phase II. Practical considerations of delivering a programme within a limited timeframe made it difficult to involve tripartite constituents in all aspects of programming. It was expected that SDIR /WRC projects will support workers participation. In reality, this did not happen as envisaged.

Though not a focus currently, environmental standards is the new /emerging compliance requirements for large and SME factories (tier 1) in the RMG sector.

Conclusion and Recommendations

Conclusion:

Achievements: The RMGP II primarily intervened at the policy, regulatory, and industry levels, whereas BWB component of the programme intervened at the factory and worker levels. The programme interventions directly contribute to the implementation of the NTPA and are highly relevant to the needs of the RMG sector. The programme assisted the government in ensuring the remediation of active NI factories. The programme contributed to institutionalising remediation strategies (in the form of RCC followed by ISU in DIFE). The partnership and collaboration with various ministries and agencies resulted in the establishment of a factory licensing OSS with several GOB agencies /departments involved (BIDA, DIFE, BFSCD, RAJUK, and CDA). The programme provided technical assistance to the BGMEA and BKMEA to assist their members in OSH and remediation, and for strengthening safety committees. RMGP II assisted in a smooth transition of Accord and Alliance into new nationally registered initiatives (RSC and Nirapon respectively) with minimal disruption to their respective lines of activity. The programme made significant progress across all four strategic areas and achieved most of the log frame targets. The programme's outputs of policy/strategy documents, frameworks, tools, and advocacy materials are very impressive. The programme has contributed to the development of an OSH strategy, an NPA, a roadmap for DIFE, a gender strategy for DIFE, standard operating procedures for DIFE, factory design guidance, and numerous research reports, videos, and publications, modules, guidelines, etc. DIFE's institutional capacities, structures and systems have considerably improved. These long-term regulatory reforms are likely to assist the RMG industry in remaining more compliant, competitive, and forward-looking. The RMG industry as a whole has become safer over the past decade (over RMGP I and II). The programme supported a range of 'gender integration' initiatives across different institutions (DIFE, BFSCD). The programme has contributed to the creation of a secure and healthy working environment for women, as well as achieve some initial success in increasing the number of women in leadership positions of different committees. If systemic change and institutionalization, catalysed by the programme, continues, there will be less need for direct ILO assistance because "systems" of initiatives (DIFE-NI, BIDA-FBCCI, DIFE-ISU, RSC, BW, Nirapon) and institutions that are capable of carrying out their mandates (DIFE, BIDA, FBCCI, BKMEA, BGMEA, BEF, WRC, IBC) are available to do so.

Challenges, gaps, points for improvement: The integration challenges of the RMGP II and SDIR projects limited complementarity and the coherence of one single programme. Remediation finance, phased out in 2019 as per the tripartite and donor agreed plan, may have continued relevance which needs to be further assessed. There are numerous untapped opportunities for RMG sector initiatives (DIFE-NI, RSC, Nirapon) to strengthen their connections and mutual learning. A sector-wide need was also perceived for a nationally defined unified code of conduct for safety, social (and environmental) compliances. While category 1 NI factories achieved 79% of remediation progress, it was also clear that about 55% of active factories achieved less than 50% of remediation progress during RMGP II. It was also noticed that BGMEA and BKMEA would need to carry out more follow up support after training to their member factories to ensure that enhanced capacities are translating into improved behaviours (in terms of safety culture) and actual change on the ground in terms of working conditions of workers (including women workers). Most of the transformative changes evidenced by this evaluation have happened in the domain of policy and regulatory framework and among the relatively large and medium-sized factories and with workers working therein. Many of the SME factories, including those who are not covered by any initiative (expected to be 1000+ factories), are left behind due to financial constraints, and a culture of safety has not yet been established in many of these factories. Overall, beyond safety, social compliance (except in BW factories) is less evident, environmental concerns are more so in these and even in some medium /large factories. DIFE gender roadmap is ambitious, needing strong implementation and cultural change within the organisation. NI factories continues to have lower representation of women in PCs /SCs or as welfare officers. Concrete changes (childcare facilities, maternity leave and other benefits, complaint handling mechanisms, anti-harassment committee), freedom to complain require changes in norms and cultures at factory

and societal level, which may require much longer and more strategic efforts. Further, if the BWB becomes the convenor, then the structural modalities of delivering the advisory support to its member factories would drastically change, requiring shift in roles and working modalities, which is being worked out by BWB. Overall, building on the momentum established over the last decade, systemic change in the RMG sector would require further processes of wide scaling of impact and institutionalisation.

Recommendation:

The recommendations follow the evidence presented in the evaluation findings. There are six main recommendations detailed in section 4.2 of the report. Here is the summary of these recommendations:

R.1: Develop a fully integrated third generation of reforms / next phase of the programme – ILO Country Office: The ILO country office should continue to support the RMG sector to complete the ongoing process of ‘institutionalisation’ and to ensure sustainability of structures building on the momentum achieved so far. At the same time, the ILO in Bangladesh should expand its focus to the non-RMG sectors: Suitable adaptation and replication of the RMG model of compliance to other non-RMG sectors – both export-oriented and risk-prone sectors serving domestic markets. The expanded and a fully integrated programme should contain four strategic areas - Strategic Area 1: Prevention, Assessment and Remediation (with clear links with other Government department responsible for building safety), Strategic Area 2: Piloting and scaling up the BW convening model, Strategic Area 3: Social dialogue and industrial relations, and Strategic Area 4: OSH in practice. ***(High priority, high resource requirements and long-term time frame)***

R.2: Private sector led initiatives develop strong linkages within and with DIFE-NI and with other government departments responsible for building safety: – Private sector-led initiatives (including BW) in the RMG sector: DIFE cooperation modalities with BW, RSC and Nirapon can be developed further. The code of conduct and modalities of operations between DIFE-NI, RSC, Nirapon and BW can be unified (with coverage on safety, OSH, and social compliance issues. Initiatives can share their data on one platform. Initiatives can organise regular knowledge exchange and learning sessions (under the ambit of ISF). Initiatives also develop stronger linkages with other government departments responsible for building safety. ***(Medium priority, medium resource requirements and medium-term time frame)***

R.3: Private sector initiatives (BW, RSC and Nirapon) can strengthen their work in social dialogue, skill building and leadership promotion of women, and behaviour change of factory management: Private sector-led initiatives in the RMG sector: Learning from BW experiences, for achieving systemic change (as was the intent of RMGP II), all the private sector initiatives (including BW) can potentially include social compliance elements in their programming. The initiatives (including BW) can particularly invest more in female workers' skill development, establish effective grievance/complaints mechanisms, enhance social dialogue and community-level collaboration, promote agency and opportunities for leadership and representation of women workers and work towards a comprehensive culture and behaviour change among the factory management. ***(Medium priority, medium resource requirements and medium-term time frame)***

R.4: Framing a national unified code of conduct for safety, social and environmental compliances: The Government of Bangladesh and the ILO: There is a realisation that the country needs a unified code of conduct on safety, social and environmental compliances, aligned with existing regulation (BLA /BLR). There are country examples such as China and Vietnam with comprehensive national laws that guide all initiatives for safety, social and environmental compliances. A national unified code will ensure that there are same rules for

every buyer as national law will uphold always. **(Medium priority, low resource requirements and short-term time frame)**

Recommendation 5: DIFE and ISU strengthening measures are continued to complete ‘systemic’ change and institutionalisation processes underway: The ongoing process of systemic change and institutionalisation would need further boost through actions by the Government of Bangladesh and DIFE. Some of these actions can be supported by the ILO-Bangladesh, in terms of peoples and processes (and not so much on heavy costs of technology and infrastructure). These actions are summarised as: a) stronger institutional structure of ISU a developed with more staffing and financial resources, b) greater institutional coordinations among different departments of the GoB is needed. DIFE /ISU can facilitate this with support of the ILO-Bangladesh. This is to ensure that LIMA and OSS achieve a higher degree of functionality and increased use among intended users, c) BGMEA and BKMEA are supported for conducting follow ups with their constituents in terms of ensuring ‘practice’ and ‘behaviour’ level changes at the factory floors which constitutes concrete improvement of safe and decent working conditions for the workers (including women workers) in the RMG sector, d) continue the operation of the ILO collaboration with FBCCI to extend the safety and health issues in all RMG factories and in other high-risk sectors. The ILO Bangladesh can support FBCCI in analysis of data it has gathered for 5206 factories as it can help in not only risk profiling of different sectors and districts but also in policy advocacy for a safer and socially complaint industries in the country. **(High priority, medium resource requirements and medium-term time frame)**

R.6: Re-examine relevance of remediation finance and redesign and reboot if needed: Donors /other UN agencies (with ILO facilitation): The evaluation recommends an assessment of the root causes, relevance and need for the remediation finance. Based on this assessment, redesign, and reboot of remediation finance products is needed with support from other UN agencies (such as IFC), donors and the Government of Bangladesh. Though not part of its mandate, the ILO can facilitate this process by collaborating with donors and other UN agencies if such an initiative is found to improves systemic change in the RMG sector. Remediation finance should ensure compliance with building regulation in such a way that no remediation would be needed in the future. **(High priority, low resource requirements and short-term time frame)**

Lessons learned and emerging good practices

The RMGP II facilitated a significant transformation in the safety culture in the RMG sector, especially among the factories assessed and remediated by different initiatives. This can be attributed to a combination of regulatory initiatives, policy reforms, new structures, effective protocols, working models, and strengthened capacities of tripartite stakeholders. The programme led to sustained enhancement of institutional and technical capacities and the culture of collaboration amongst different stakeholders. These programme contributions, especially to DIFE, can potentially contributes to impact beyond the RMG sector. Risk-profile based strategic labour inspections, digitalization, and stronger enforcement capabilities are likely to pave the way for DIFE to become more effective in the future for all industrial sectors. Also, the long-term success of the ISU relies on the active participation and support of the government, particularly in providing ongoing technical expertise and resources and in establishing a clear role and mandate for the ISU so that it effectively collaborate with private sector initiatives to achieve further transformation in the RMG sector and beyond.

Gender roadmap at DIFE is a pioneering initiative at a government department in Bangladesh. Equally notable is also the BW’s innovations related to enhancing gender equality on factory floors. Achieving greater impact would require an enabling working environment for women that addresses societal attitudes and establishing supportive systems. It is also learnt that continuous and consistent advocacy and innovations would be needed to provide the momentum to progress towards gender mainstreaming and women empowerment in the RMG

sector.

While the OSH plan of action is a valuable resource for promoting workplace safety, emphasizing its implementation, regular review, and monitoring by stakeholders is necessary to ensure its effectiveness and adaptability to evolving needs and challenges in occupational safety and health. DIFE's helpline service is a much-needed support to workers to raise their grievances but it would need to improve its accessibility, gender sensitivity, and prompt resolution to maintain trust and encourage utilization.

Overall, the RMGP II work portray a picture of a successful sectoral reform model. This sectoral reform model incorporates a strong collaborative architecture, with a range of initiatives working with a common purpose even though modalities of implementation are different. The successful reform model also means a Safety+ approach (including social compliances as well) has higher potential in improvement of working conditions in the RMG factories. Also, addressing legislative gaps and ratifying conventions such as C190 can further advance country' credentials in international export markets.

1. Introduction

1.1 About the programme

The Tazreen and Rana Plaza disasters promoted a major effort to improve working conditions in Bangladesh. The International Labour Organisation (ILO) along with the Government, employers, workers implemented a programme— Improving working conditions in the ready-made garments sector in Bangladesh (RMGP) first phase from October 2013 to June 2017. First phase of the programme included four components – i) Building and fire safety assessment, ii) Strengthening labor inspections and fire and building inspections, iii) Building Occupational Safety and Health (OSH) awareness, capacity, and systems, iv) Implementing a Better Work (BW) program. Over the course of the first phase, the programme made a significant contribution as RMG factories were inspected, various standards harmonized, the labour inspectorate reformed, and progress made to establish a culture of OSH. The first phase also supported Rana Plaza survivors to re-enter the workforce.

In its second phase, the ILO RMG programme has continued to build upon phase 1 achievements to further improve industry safety and working conditions. The second phase of the RMG programme is implemented from July 2017 to June 2023 (6 years) and is funded through contributions from Canada, the Netherlands, and the United Kingdom (DFID /Foreign and Commonwealth Development Office - FCDO). For BWB, the programme funding complements revenues generated through programme activities as well as funding from other development partners.

The development objective of the RMGP II programme is to ensure safe and decent working conditions contributing to improved competitiveness in the garment and other sectors in Bangladesh. Using an integrated approach, the RMGP II was structured along four broad strategic areas (SAs) which are mutually supportive and re-enforcing.

Table 1. Strategic areas and associated outcomes

Strategic area	Outcome¹
Strategic Area 1: Ensuring factory safety through remediation.	Outcome 1: By the end of 2022, all active factories of the target 1,549 National Initiative (NI) factories are remediated
Strategic Area 2: Governance building to effectively regulate industrial safety and support labour inspection reform.	Outcome 2: Government effectively regulates industrial safety. Outcome 3: Effective and equitable labour inspection system in place based on robust performance management accountability and a sound gender equality culture
Strategic Area 3: Improving OSH in both policy and practice, in a gender inclusive manner	Outcome 4: OSH improved in policy and practice in a gender inclusive manner.
Strategic Area 4: Expansion of Better Work Bangladesh programme to ensure compliance in at least 400 RMG factories.	Outcome 5: Better Work factories serve as model for compliance with international labor standards.

The Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component (2022-2024) is part of a regional programme implemented in 4 countries including Bangladesh, Cambodia, Vietnam, and

¹ As per the logic of the programme theory of change (see figure 1), these outcomes can actually be considered as 'intermediate outcome' as these are stepping-stone towards higher-order change related to RMG sector becoming more compliant with wide-spread change in safety culture /mindset.

Japan. In Bangladesh, the programme is managed in conjunction with the on-going Better Work Bangladesh Programme, with the overall coordination of the METI project. The project objective is similar to RMGP II in that it aims to (i) improve working conditions (ii) improve the wellbeing of workers and (iii) support firms in the specified sectors to make improvements in productivity and responsible business practices. The METI project has three outcomes:

Outcome 1: Enterprises improve social compliance and adapt good labour practices in line with national laws and ILS with social dialogue structure in place.

Outcome 2: Stronger tripartite institutions and collaboration create conducive enabling environment for RBC.

Outcome 3: Providing evidence base and required awareness to help policy discussion.

1.2 The programme theory of change

Even though there is not specific diagram, the programme theory of change is amply described in the Programme Document (ProDoc) dated 13th March 2018. Articulation in the ProDoc provides a deeper and adequate understanding of how programme interventions would support short, medium, and long-term changes across four strategic areas.

Building on RMGP Phase I achievements and based on a new strategy (as contained in the ProDoc) to address prevailing challenges, Phase II interventions focused on strengthening factory safety through remediation, labour inspection reforms and OSH in policy and practice. Strategic expansion of Better Work in Bangladesh was also a key component of RMGP II interventions in Bangladesh. A simple diagrammatic visualisation of theory of change (by the evaluation team, based on ProDoc and other programme documents) articulates those strategic objective linked outcomes, as described in table 1 above, can actually be considered as intermediate outcomes since achievement of these outcomes are stepping-stone towards achieving higher-order outcomes. Higher-order outcomes are development outcomes related to the RMG sector becoming more compliant with:

- i. Improved regulation and enforcements by the ILO constituency partners such as Government institutions (such as MoLE, DOL/DIFE, BFSCD, BIDA), Industry and Employers organisations (such as BGMEA, BKMEA, BEF, and FBCCI) and workers organizations (such as NCCWE, IndustriAll)
- ii. Responsible business conduct by factories and firms in the sector
- iii. Improved safety culture throughout the sector including Government, employers' organisations, workers organisations, factories, and workers.

When the sector becomes more compliant i.e., when development outcomes are achieved, then it can contribute to /usher in three main development impact:

- i. Improved industrial safety,
- ii. Improved working conditions and wellbeing of workers and
- iii. Factories and firms in the sector become more productive

Having achieved this level of impact is likely to enhance competitiveness and growth in the garment and other sectors in Bangladesh, contributing to SDG 8.5 (full and productive employment and decent work for all, and equal pay for work of equal value), SDG 8.8 (labour rights and secure working environments for all) and SDG 16.6 (effective accountable and transparent institutions). The ILO /RMGP II interventions can ultimately contribute to other SDGs as well such as SDG 1 (poverty reduction), SDG 5 (gender equality) and SDG 9 (industrial innovation and infrastructure) and thereby to the graduation of Bangladesh from a Least Developed Country (LDC) to a developing country status.

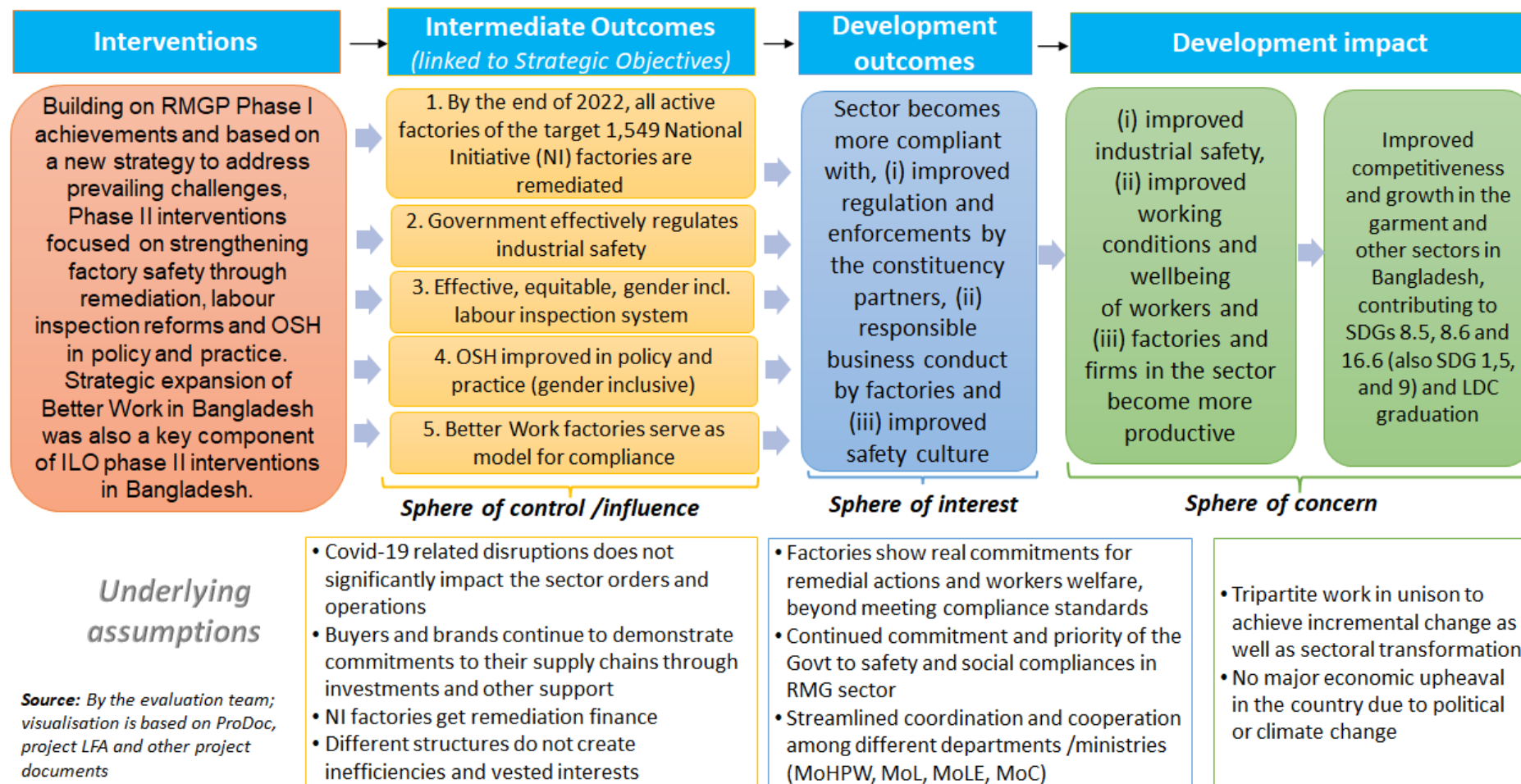
However, as can be expected, achievement on the lines of theory of change is a not linear process as contextual realities (social, political, economic context) and other factors (such as interest and commitment of social partners) can accelerate or undermine the progression and achievement of hierarchy of results. It is important, therefore, to visualise the risks and assumptions in the progression of a theory of change. RMGP II maintained a risk register and

periodically analysed risks that can hamper progress and achievements of results. In the ToC, some of these risks are highlighted in the transitions from interventions to intermediate outcomes and from intermediate outcome to development outcome and then from development outcome to development impact.

Understanding a trajectory of change is critical for any evaluation exercise such as this one. A robust theory of change provides an anchor / framework to the evaluation as it logically and plausibly indicates how interventions and strategies pursued by the programme can potentially contribute to different hierarchy of results and what factors have contributed to accelerate or impede this progression. This analysis is presented in different sections of this evaluation report.

Figure 1. Simple visualisation of RMGP II and BWB theory of change

RMGP II and Better Work Bangladesh: Simple visualisation of change (2017-2023)



2. Evaluation Design

2.1 Purpose of the evaluation

As per the TOR, the main purpose of the independent final evaluation is for improving learning and accountability. The purpose of the evaluation is:

- Review the **overall achievements** of the RMGP-II and BWB in terms of outputs and outcomes
- Examine **relevance, design, efficiency, effectiveness, impact, and sustainability** of RMGP-II and BWB, including programme contributions to cross-cutting issues related to gender equality, non-discrimination, social justice, and environmental sustainability
- Assess how **management and governance arrangements** were appropriate, and how cross-cutting issues were addressed
- Identify the **main difficulties, constraints and distil best practices, lessons**, and insights from implementing the cluster of projects (RMGP-II and BWB) in Bangladesh
- Provide **practical recommendations** that can inform future reforms in industrial safety, labour inspections and workers welfare in RMG sector and beyond in Bangladesh

The evaluation complies with the [ILO evaluation policy](#), which is based on the [United Nations Evaluation Norms and Standards](#) and the [UNEG ethical guidelines](#). The evaluation adheres to ILO reporting guidance in a) formulating and presenting recommendations, b) identifying and presenting lessons learned, and filling in the appropriate templates; and c) identifying and presenting emerging good practices and filling in the relevant templates.

The primary end users of the evaluation findings are the program management team and the ILO Country Office in Dhaka, the donors (Canada, Netherlands, UK), ILO's constituents, ILO technical and collaborating departments and in-country partners and stakeholders. Canada provided an \$8 million grant (2013-2017) and a \$10 million grant (2018-2023) to the ILO in support of its improving working conditions in the RMG Sector. Secondary users include other programme stakeholders, other UN organisations, other countries where similar ILO interventions are ongoing as these entities may indirectly benefit from the evidence and insights generated by this evaluation.

2.2 Evaluation Objectives

The evaluation has focussed on addressing 11 evaluation objectives:

- **EO1:** To assess relevance and effectiveness of the programme considering the changing context of the programmes e.g., Accord and Alliance leaving and RSC's existence, and other underlying factors beyond ILO's control that affected and might affect the achievement of the programme outputs and outcomes
- **EO2:** Informing the ILO whether the current programme strategy of both programmes is valid. To what extent, the recommendations of the midterm independent evaluation has been taking into consideration
- **EO3:** To assess the long-term changes and impact of the programme and its sustainability and whether it can be linked with phase one (2013-2017) and to what extent
- **EO4:** Independently assessing the contribution of RMGP-II and BWB to gender equality, non-discrimination, social justice, environmental sustainability.
- **EO5:** To assess complementarity and the effectiveness of the collaboration between the different programmes in the sector and provide recommendations on what could be improved and how.
- **EO6:** Identifying good practices and lessons learned that would contribute to learning and knowledge development of the two programmes and their stakeholders.

- **EO7:** To assess any change (institutional /operational etc.) within the GOB agencies e.g., DIFE, ISU Industrial Safety Unit/ ministries as well as other actors that this programme aims to influence.
- **EO8:** To assess level of effectiveness of the management arrangements and the impact of RMGP interventions versus value for money.
- **EO9:** To assess how the programmatic interventions and achieved outcomes have influenced the national priorities in the area of trade, socioeconomic development.
- **EO10:** To assess how the programme contributed towards better preparation of the country for smooth transition in the upcoming development trajectory in post LDC graduation.
- **EO11:** To assess systemic changes elicited by the programme(s), intended or otherwise

2.3 Evaluation Framework

The evaluation framework is developed based on three frames of thinking and assessment:

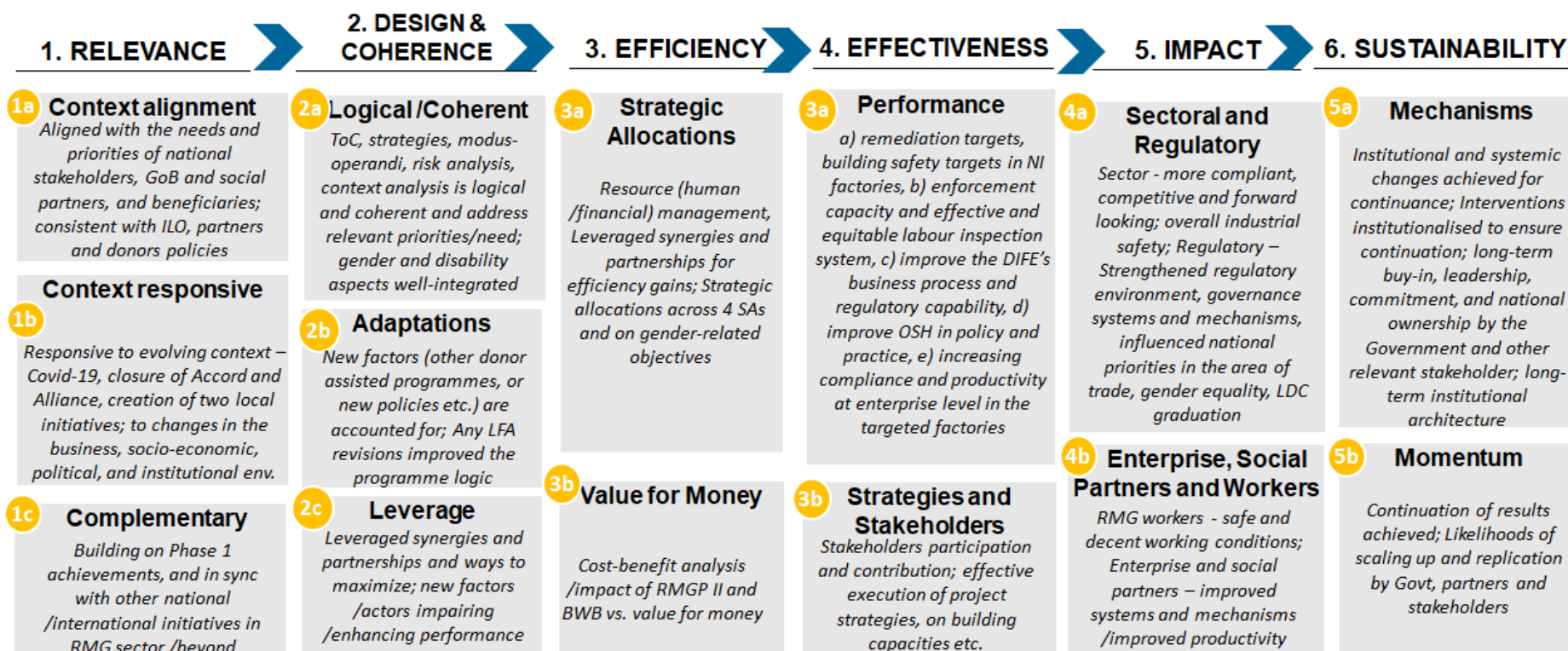
- Visualised theory of change of the programme (see figure 1), as defined in the ProDoc
- 11 evaluation objectives (section 2.2), as defined in the TOR of this evaluation
- 42 TOR questions following the Organisation for Economic Co-operation and Development-Development Assistance Committee (OECD-DAC) parameters

Overall, these three frames intersect and overlap with each other in useful ways. We consider that 42 questions OECD-DAC framework is the most comprehensive and therefore we have used this as the basis of evaluative analysis and presentation in this report. Where relevant, references to the ToC and 11 evaluation objectives have been made in the evaluation findings. The evaluation has gathered evidence and data to assess the ToC, 11 evaluation objectives and 42 evaluation questions, all of which were clustered into the following seven elements:

1. **Relevance:** assessing context alignment, context responsiveness, and complementarity of the programme
2. **Design and coherence:** assessing logic and coherence of the programme theory of change, programme strategies and structures, including gender equality strategy, leveraged synergies and partnerships, adaptations in design if any, engagement with 'fit for purpose' social partners.
3. **Efficiency:** assessing efficient and strategic resource allocations, including gender budgeting, Cost-benefit /value for money,
4. **Effectiveness:** Effective programme performance (target vs. achievements), effective stakeholders participation and contribution, effective execution of programme strategies, and unintended outcomes (positive or negative).
5. **Impact:** assessing impact of the programme at three levels, a) Sectoral and regulatory, b) Enterprise level improved systems and mechanisms for better compliance and any productivity improvements, c) social partners level improved systems and mechanisms and workers welfare and benefit
6. **Sustainability:** assessing mechanisms that are likely to impart continuity of interventions and their benefit and assessing momentum already achieved and the likelihood of scaling up and replication by Govt, partners and stakeholders.
7. **Management arrangement:** assessing governance and staffing structures, skills, partnerships, role divisions, systems for assessing performance, risk management, adaptiveness in execution, cross-cutting issues, lessons learnt and best practices.

The evaluation framework is captured in figure 2 below. The 42 evaluation questions are aligned with the evaluation framework used. See this detailed list of these evaluation questions and how these are aligned with the evaluation framework in Annex 2. In the evaluation findings section 3, we have used notations of evaluation question as EQ1 or EQ2 and so on while answering these questions with relevant findings.

Figure 2. RMGP II Cluster Evaluation Framework



7. EFFECTIVENESS OF MANAGEMENT ARRANGEMENT, CROSS CUTTING ISSUES AND LESSONS LEARNT

- Governance and staffing structure; skills, partnerships and role divisions, gender
- Systems for assessing performance and impact, risk management
- Adaptiveness in execution
- Facilitating or constraining factors for achieving outcomes and objectives
- Cross-cutting issues: gender equality, normative and tripartite mandate, env sustainability
- Lessons learnt and good practices

We have clustered 42 evaluation questions (as per OECD/DAC criteria) into 21 clusters as is shown in the evaluation framework (see figure 2). All 21 clusters were assessed, and observations and evidence are provided in the report.

The evaluation has conducted assessment of covid-19 related disruptions and adaptiveness of the programme, gender equality and inclusion of people with disabilities as a cross-cutting concern throughout the assessment in the evaluation report.

2.4 Evaluation methodology and approach

The evaluation was guided by the following principles:

- Evaluation design was vetted against the **OECD-DAC criteria**, reflecting upon the relevance of the interventions, responsiveness to changing contexts, outcome and impact, sustainability, and impact.
- The evaluation applied **mixed methods (qualitative and quantitative) for data collection and analysis**, to the extent possible within the scope of this evaluation. The evaluation enquiry was mostly qualitative through key informant interviews while the quantitative data was collated and consolidated from different sources (programme monitoring database, outcome, and research studies etc.)
- **A participatory and consultative process** was used to generate insights and perspectives from the programme stakeholders and social partners.
- **Flexibility and rigour** (as possible) were built into the evaluation processes to take account of the uncertainties and challenges (e.g., covid-19 related disruptions) within the Bangladeshi context.
- For assessment of **gender equality**, we have taken inspiration from the **UN SWAP methodology and score card**². See more details on this later in this section.
- In assessing **Value for Money (VfM)**, we have used DFID approach to assessing VfM, however full-scale application of this approach was not possible within the scope of the evaluation.
- In assessing **labour governance reforms** (one of the strategic objectives of the programme), we analysed progress and gaps in achieving National Action Plan of Labour Sector of Bangladesh (2021-26). This assessment is indicative of what the programme have contributed to achievement of labour governance reforms.

The evaluation was conducted through a consultative and participatory process, engaging with key stakeholders during field mission (19 May to 1 June 2023) in Bangladesh as well as through online meetings. The selection and adequate coverage of each stakeholder group has been ensured during the evaluation process as we conducted about 60 key informant interviews and focus group discussions engaging more than 100 individuals the ILO team, collaborating departments and in-country partners, ILO constituents, RMG factories and workers.

The evaluation has used the following methods:

- **Review of documents:**
 - Secondary literature related to Bangladeshi context, programmes, and policies
 - Programme documents, outcome studies, legacy study, programme monitoring reports, mid-term evaluation report and other programme documents
 - ILO DWCP for Bangladesh 2022-26
 - Donor strategy documents
- **Key informant interviews and focus group discussions:** We covered more than 100 key informants in about 60 interviews and focus group discussions (see annex 4 for details)

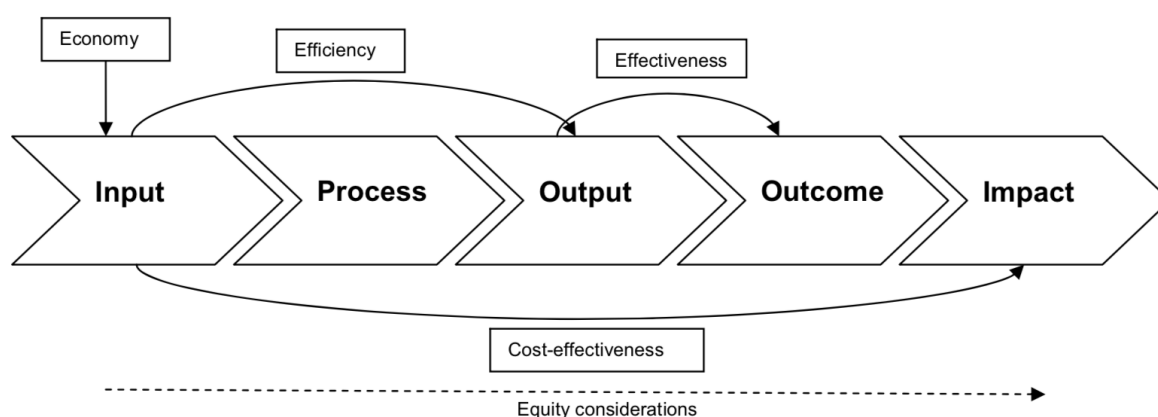
² [Ukraine-Gender-Scorecard-Report-2016.pdf \(un.org\)](#)

of stakeholders covered) The key informant came from a cross-section of stakeholders representing Programme Steering Committee (PSC), the ILO team in Bangladesh, Government ministries and departments, employers' organisations, workers' organisations, Implementing Partners (IPs), international brands, factories, and workers. These interviews and focus group discussions, including with the factories and workers, was conducted during the data collection period of 10 May to 5 June 2023.

- **Contribution analysis** was conducted on three main frames of assessment, a) 42 evaluation questions, b) 11 evaluation objectives, c) programme theory of change. Overall, several perspectives and a range of data (from the programme documents, including outcome and legacy studies) were utilised to make robust assessment of the programme contributions.
- **Periodic briefing and debriefing** with the ILO team, validating the assessments carried out. We conducted two debriefs (31st May and 26 June 2023) to ensure that ILO team and its constituency partners have opportunities to validate the findings and recommendations of the evaluation.

The UNCT-SWAP Scorecard is a tool used by the evaluation to measure how well the United Nations works to promote gender equality at the country level. It was created through almost two years of collaboration between the United Nations Sustainable Development Group (UNSDG), UN Women, and the United Nations Development Programme (UNDP). The UN-SWAP Scorecard was updated to align with the SDGs and harmonized to strengthen accountability for gender mainstreaming and development results at the country level³. However, the independent evaluation team were inspired to use the UN SWAP-Scorecard, which assesses how gender equality is incorporated into RMGP phase II program implementation. This scorecard considers 7 different areas, including planning and programming, monitoring and evaluation, partnerships, leadership, gender architecture and capacities, resources, and results. The methodology was utilised by the evaluation to assess programme progress in achieving gender equality. It provides a comprehensive overview of gender mainstreaming in the programme.⁴

Figure 3. DFID /UK Government approach for assessing Value for Money



The assessment of VfM, we have considered the DFID's 2011 Approach to Value for Money⁵.

³ <https://undg.org/document/un-system-wide-action-plan-on-gender-equality-and-the-empowerment-of-women/>

⁴ https://unsdg.un.org/sites/default/files/UNCT-SWAP_Gender-report_Web.pdf

⁵ DFID's Approach to Value for Money, DFID 2011, [DFID's Approach to Value for Money \(VfM\) \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214242/DFID_s_Approach_to_Value_for_Money_VfM.pdf)

This sets out the four principal contributors to VfM - **Effectiveness, Efficiency, Economy, and Equity**. All three are all required to achieve a cost-effective impact (poverty reduction) from the input (primarily DFID funds). Efficiency is about conversion of 'inputs' into 'outputs'. Effectiveness is about, outputs from an intervention achieving the desired outcomes e.g., on safety and social compliances and on working condition and well-being of the workers. Economy is about procurement / buying of inputs of the appropriate quality at the right price. Equity is an overriding concern in the VfM assessment in terms of how the most vulnerable (e.g., workers in the tier 2 and other National Initiative factories) have benefited from the programme. The cost-effectiveness parameter of VfM methodology is not assessed.

The assessment methodology relies on cross-sectional consultation and collective analysis to rate the RMGP II program for each indicator against minimum standards. While the desk review document was an essential part of the evaluation, the participation of different stakeholders and factory level respondents in interviews and FGDs captured the perceptions, knowledge and practice across multiple areas and mandates of the programme. Hence, the findings of the UN SWAP (United Nations System-wide Action Plan on Gender Equality and the Empowerment of Women) also exemplify the characteristics of institutional frameworks such as management and budget systems, information management, communications, monitoring and evaluation systems, partnerships, and organizational culture that have the potential to facilitate or impede the promotion of gender equality.

2.5 Scope and limitations of the evaluation

The evaluation methodology is utilisation focussed and responds to both accountability and learning concerns of the ILO programme stakeholders. It has captured lessons and insights on programme performance as well as generated a few forward looking and practical recommendations. The evaluation has uncovered the intended and unintended changes that has happened. However, the methodology was not designed to uncover or clearly assign causality /attribution to the changes observed. Several other intervening factors, beyond the programme have contributed or undermined the envisaged outcomes. The scope or design of the evaluation was not intended to capture attributed impact. However, the evaluation has derived facilitating and constraining factors that have contributed or undermined the programme achievements.

This is a comprehensive evaluation with 11 key evaluation objectives and 42 question spread across 7 main OCED /DAC parameters (see figure 2, evaluation framework). While the evaluation maintained necessary focus and emphasis on all evaluation questions, it is expected that evaluation is not able to generate equally robust findings on all evaluation questions, due to:

- Paucity or inadequacy of data available from programme monitoring and evaluation, e.g., the evaluation is not designed to collect rigorous impact level evidence and largely relied on outcome /impact studies carried out by the programme.
- Similarly, it may not be possible to validate available evidence on all evaluation questions /parameters due to limitedness of timeframe /methodological approach of the evaluation.
- The evaluation team had a limited timeframe and a window of opportunity to meet key stakeholders. Some of the key informants were not available during the data collection phase of the evaluation, thereby missing some perspectives on certain issues.
- Evaluation team have a very limited timeframe to generate its report, limiting more in-depth reflections on each evaluation question

Conducting efficiency and 'value for money' (VfM) analysis will be predicated by the availability and access to the granular financial data. The evaluation team have access to a broad summary of financial data (not activity wise and not including gender markers) and therefore a simple /rudimentary efficiency and VfM analysis has been carried out. A detailed VfM

analysis (related to cost-benefit /cost-effectiveness) requires much more granular information related to both 'costs' and 'benefits'. This is true for analysing gender budgeting. A more detailed VfM analysis was, anyway, outside the scope of this evaluation

Regarding assessment of effectiveness of governance and management arrangement, the evaluation team have relied on the openness and honest sharing of the feedback and perspectives by the key stakeholders interviewed and if some issues are considered sensitive where information is withheld from the evaluator, then the evaluator have only reported the facts available to the evaluation team.

Covid-19 related disruptions have been analysed under adaptiveness of the programme to changing circumstances. A more detailed covid-19 related assessment was outside the purview of this evaluation.

Overall, while the evaluation team have gathered a wide range of perceptions regarding the performance and results of the programme, however, it was not possible to robustly quantify and statistically signify the outcomes as the evaluation is largely qualitative in design.

3. Evaluation Findings

3.1 Relevance

Context alignment (EQ 1 and 2)⁶

The programme interventions were highly relevant with the situation, needs and safety priorities of RMG sector: The RMGP II is the continuation of first phase of RMGP wherein 1,549 factories under the National Initiative underwent inspection for structural, fire and electrical safety, with those posing an immediate danger to workers lives closed. The groundwork for the formation of a Remediation Coordination Cell (RCC) to carry forward and oversee this work was also carried out in the phase 1. The operating modalities of the RCC were established. Lessons learned from the first phase highlighted the need for a more harmonized legislative environment relating to fire and building safety as well as a more streamlined and transparent factory registration and licensing mechanism which would contribute to overall factory safety. By October 2017, BWB was working with 151 RMG factories employing some 314,192 workers and partnering with 18 international brands. It was realised that BWB work is relevant and impactful needing further expansion. As the ProDoc says, Phase II was needed to leave a legacy of stronger laws, systems and governance mechanisms that translate into a safer industry that goes beyond achieving minimum lowest standards.

The programme contributes directly to implementation of the National Tripartite Plan of Action on Fire Safety and Structural Integrity in the garment Sector of Bangladesh (NTPA). RMGP II also aligns with other important national strategy documents such as the Decent Work Country Programme (2020-2026), specifically DWCP Outcome 1. In fact, the programme is relevant for the four DWCP outcomes as the underlined words in the outcome statements indicate:

- **DWCP Outcome 1:** By 2026, more people in Bangladesh, particularly the most vulnerable and marginalized from all gender and social groups, and those from lagging districts, have access to and can enjoy full and productive employment and decent work opportunities resulting from responsible, inclusive, sustainable, green, and equitable economic development (adapted from UNSDCF).
- **DWCP Outcome 2:** By 2026, more people, in particular the most vulnerable and marginalized, have improved access to and utilization of quality, inclusive, gender, disability and shock-responsive, universal, and resilient social protection systems and basic social services (adapted from UNSDCF).
- **DWCP Outcome 3:** By 2026, more people, especially the most vulnerable, benefit from more equitable, non-discriminatory, gender-responsive, participatory, accountable governance and justice, in a peaceful and tolerant society governed by the rule of law (UNSDCF).
- **DWCP Outcome 4:** By 2026, more women in the world of work benefit from improved policies, laws, and measures to reduce gender-based violence and harassment; reduce women's disproportionate unpaid care responsibilities; increase women's voice, representation, and leadership; and increase access to a gender responsive work environment.

As stated in the ProDoc, The Seventh Five Year Plan (2016-2020) has specific objectives on fire safety; capacity building of garment industries to promote employment, improved environmental standards, and addressing gender bias in the industry. These build on the directions established in the preceding Plan, illustrating the importance of the sector and the continuing political commitment to reform.

⁶ For the detailed wordings and the list of 42 evaluation questions, please refer to Annex 2.

The programme is consistent with ILO's mainstreaming strategy on gender equality. The programme design has a very clear gender focus (assessed in section 3.2). The programme is pertinent to stakeholders' (MOLE/DIFE, BFSCD, employers' and workers' organizations) requirements and policies of partners and donors and the continuing needs for reform of the RMG sector in Bangladesh. Within the changing context due to socio-economic impact of Covid-19, the programme became even more relevant as it provided support to the factories to improve their standing on safety and social compliances so as to remain relevant and attractive to international buyers. The programme remained relevant for workers for ensuring translation of factory level improvements into working conditions and well-being of workers. The continuation of the programme was necessary for also ensuring that the transition to Accord and Alliance happens smoothly.

Context responsive (EQ 3)

The programme facilitated an effective transition from Accord and Alliance to nationally registered initiatives: The private sector led (buyer driven) Accord and Alliance initiatives were immensely successful (in the first phase of RMGP) for initiating reforms of industrial safety in the RMG sector. Both the initiatives ended after five years (2013-2018). At that point, there was no clear understanding how these initiatives would be registered within the country. Further, not all factories have been covered under those initiatives and a strong clarity was needed in terms of proper allocations of factories to different initiatives. This is where the programme helped and facilitated a smoother transition process of Accord and Alliance transforming into new nationally registered initiatives (RSC and Nirapon), without significant gaps. A clear degree of separation was achieved among these initiatives, in terms of factory coverage.

Complementary (EQ 2)

In theory, a set of country programmes were highly complementary to each other, in practice, this complementarity was only partially realised: During RMGP II, the ILO, in partnership with its tripartite constituents and development partners, was implementing a set of aligned and complementary programmes in the RMG sector. These include the RMG second phase initiative with DIFE working with National Initiative (NI) factories, Better Work Bangladesh (BWB) and the Social Dialogue and Industrial Relations (SDIR) Project. The three projects are all focused on supporting the application of the Bangladesh labour law and helping to boost the further growth and development of Bangladesh's economically crucial RMG industry. As per the ProDoc, in order to maximise impact and avoid duplication, the SDIR and BWB initiatives were focusing on different factories. However, as per this evaluation, this reduced their complementarity. SDIR (2015-2023) project provided technical expertise and resources for Workers Resource Centre and National Coordination Committee for Workers Education (NCCWE) and IndustriAll Bangladesh. WRC supported capacity building intervention for trade unions, in about 117 factories on negotiation skills and collective bargaining. In partnership with the International Trade Centre-ILO and Centre for Advanced Legal Studies of the University of Dhaka, WRC supported a para legal country training course (6-months). The graduated para legal provided support at factory level on labour issues with 618 labour cases that came up, of which 49% of complaints resolved, 8% channelised to Govt /Non Govt machinery, and represented the workers at the labour court⁷. Working with BGMEA, BKMEA, SDIR project also supported 320 non-unionised factories on participation committees. All SDIR factories are part of RMGP II NI factories and so SDIR interventions are indeed complementary to RMGP II interventions. However, in reality, complementarity was partial as practical challenges of integration remained. The SDIR and WRC projects had very different teams, resources and priorities with some overlap which could not achieve coherence of one single programme. There is no analysis in any programme documents of how SDIR

⁷ [Labour Courts: Justice seekers suffer as deadlines ignored | The Daily Star](#). As per Law, labour court cases should be disposed of within 60 days of filing. That's hardly the case as the news items cited provides the status as of July 2023. It represents a case of justice delayed (and justice denied).

and WRC results complemented and supported design and implementation of RMGP II activities or vice versa (also see the next section).

3.2 Validity of the design

Logical and plausible design and design adaptations (EQ 5, 6 and 8)

The programme conceptualised an intervention design that is logical and plausible to bring about RMG sector reforms though practical challenges of integration between different initiatives remained: Based on the ProDoc and other documents, the visualisation of the programme design in terms of a theory of change (ToC) is presented in the section 1.2 (and figure 1). In a simple diagram, it presents how the programme conceptualised a hierarchy of results (outputs to intermediate outcomes to development outcomes to impacts) to be achieved. There are plausible connections between the result transitions (from outputs to intermediate outcomes and so on). Risks and assumptions (also see the later point in this section) are well described and monitored during the course of programme implementation. Building on the phase 1 progress and gaps, this was a reasonably well-designed intervention, working to address sectoral challenges at policy /regulatory, sector/industry, factory, and workers levels. Different programme initiatives were targeted to intervene at different levels, e.g., RMGP II was intervening mainly at policy, regulatory and industry levels while BW was intervening at factory and worker levels. Other ILO initiatives in the country, such as Social Dialogue and Industrial Relations (SDIR) and Workers Resources Centre (WRC) were addressing other key issues (constituency voice, collective bargaining, and negotiations) at workers levels. Overall design of different initiatives gives an impression of a holistic programme in the country. However, in reality and for practical reasons, it was difficult to achieve integration as each of the initiatives worked with their own teams, agenda, and resources to deliver their programme component with a certain number of factories and workers. There was some overlap of factories e.g., SDIR worked with certain number of NI factories (not all). It is likely that SDIR and WRC interventions was needed for all NI factories. It is also likely that BW interventions would have gained from SDIR and WRC approaches. But without a tightly knit sector-wide portfolio of programmes, this may have been a missed opportunity.

The programme design has considered the gender dimension in all planned interventions except that social inclusion aspects were less attended to: The programme examined the root causes of gender inequality and focused its interventions to promote gender equality and women's empowerment at DIFE, BFSCD and other constituents of the programme. Sex-disaggregated data was utilized, and innovative and women empowerment-oriented interventions were designed (and implemented) in factories of different initiatives (see table 2). However, a little mention is found in programme and gender strategy documents related to the need to understand and address specific needs of persons with disability to ensure their meaningful participation and representation in different activities of the programme though BW raised awareness on this issue in its factories.

Table 2. Distinguished elements of gendered approach across different initiatives

Aspect	BWB	DIFE	BFSCD	RSC	NIRAPON
Distinguished element of gendered approach in programme intervention	Mother@ work: maternity rights of a female worker (103 factories)	Gender Roadmap (2021-2030) Training promotes c190 advocacy	Situational Analysis Report (SITAN) training of firefighters on gender issues	Gendered approach in factory Inspections, remediation Resolving complaints Safety training	Gendered approach in safety Management Training Helpline
	GEAR: skill training for female	capacity building	training of		

Aspect	BWB	DIFE	BFSCD	RSC	NIRAPON
	workers (25 factories)	workshops gender inclusion in the OSH policy and NPA	female firefighters		
Overall coverage of factories and brands	441 factories; 40+ brand partners	1549 NI factories		Brands >150 Factories >1600, Workers >2 million	335 Factories Global Partners 55

Table 3. Assessment of gender and social inclusion in the programme design

Dimension and indicators	Achievement Levels*	Findings & Explanations
Planning and Programming Indicators include - Gender analysis, coverage of all sector constituents in gender analysis, gender and social inclusion strategy and innovative intervention planning	Level 2: Meets minimum requirement	Gender analysis is conducted, and gender-focused strategy development have taken place across DIFE, BFSCD and other constituents of the programme. The gender analysis has examined the root causes of gender inequality and discrimination and its approach is aligned with SDG 5 priorities. BW covered factories are with innovative and women empowerment-oriented interventions. Gender as a cross-cutting agenda was also incorporated throughout BWB's interventions, guided by the Better Work Global Gender Strategy which was adopted at the country level. Gender equality and women empowerment are visibly mainstreamed across all output indicators. Additionally, sex-disaggregated data, and that takes gender equality considerations into account. Social inclusion aspects (needs and priorities of people with disability) were not visible much in the programme and gender strategy documents, explaining why this aspect is not rated at Level 3 (exceeds minimum requirements)

*As per UN Country Team -SWAP methodology scorecard, achievements are assessment in terms of three levels – Level 1: Approaching minimum requirements, Level 2: Meets minimum requirements, Level 3: Exceeds minimum requirements

The programme envisaged and understood risks well and undertook design adaptations as needed: The programme envisaged 18 specific risks that could impair programme performance and results. The programme did well in designing and implementing preventive and proactive response mechanisms (see table 4). Preventive measures were effective as 8 of the 18 envisaged risks did not happen. However, 10 of the 18 envisaged risks did happen. The programme team was mostly very effective in responding to the 'materialised' risks. Some risks would continue to need programme attention in the next phase e.g., addressing bottlenecks for achieving synergy among different GoB agencies would continue to need programme support. Other risks that would need continued monitoring and programme support are, a) implementation of escalation protocol, b) transparency and credibility of remediation data, c) relationships of GoB (DIFE) with the private sector initiatives, d) BGMEA /BKMEA continued efforts for follow ups on practice level changes in their member factories, e) greater use of LIMA and OSS among intended users.

Table 4. Risk and response during RMGP II

Envisaged risk	Whether materialised	Response /preventive measure undertaken, including evaluation remarks
Decrease in GoB	No	Continuous engagement and advocacy with the Government worked to maintain the commitment.

Envisaged risk	Whether materialised	Response /preventive measure undertaken, including evaluation remarks
commitments to reforms		Several interventions (ISU, LIMA, DIFE roadmap) were useful in this regard.
BWB legacy of compliance not capitalised by the tripartite	No	Learning hub to strengthen the capacities of the ILO tripartite constituents on the application of international labour standards and national labour legislation.
Brands reducing their exposure to the country (due to Covid-19 and other issues)	Partially for a brief period	BWB continued high level engagement with the brands. The programme ensuring that remediation protocols are implemented well, despite challenges being faced.
Major fire breaking out	No	Continued capacity building of RCC and DIFE for remediation monitoring; BGMEA and BKMEA leading the way for self-policing (Utilisation Declaration withdrawal in case needed); data on remediation status updated regularly was also envisaged but less accomplished.
Undue comparisons of NI and other factories supported by RSC, Nirapon and BW	Yes	Clarifications that NI factories face less incentives and more challenges to comply and complete CAPs. Keeping appropriate NI targets was planned but the LFA continued to target 100% remediation even in NI factories.
Closure of NI factories due to economic downturn caused by Covid-19	No	Closely tracking the status of closure of factories and developing support mechanism for reopening. Persistence in following through the RCC work plan for remediation despite covid-19 related challenges.
GoB slow response or failing to act on agreed priority actions	Yes	Continuous engagement with DIFE and RCC; BV support and handover; extending implementation agreements with RCC; facilitating coordination among all departments and agencies involved. Without active support from the programme in resolving constraints to GoB response, it may continue to post risk in future.
Slow follow up and partial implementation of escalation protocol of remediation	Yes	Working with GoB on the EU action plan and national roadmap for effective implementation; regular follow ups with DIFE; continuous improvement of LIMA - Remediation Tracking Module (RTM). This will continue to need programme support.
Lack of transparency and credibility of remediation data	Yes	BV risk ranking of 666 factories and verifications of remediation data on NI factories (30% data discrepancies found); RTM constantly upgraded. This will continue to need programme support.
GoB- private sector relationship unclear	Yes	Facilitating a technical sub-committee to find common agreed solutions in relationship of DIFE and other private sector initiatives. However, the risk continues to exist, and more clarity is needed in terms of DIFE-RSC linkages, and DIFE linkages with other initiatives.
OSH master trainer	Yes	The programme ensured selection of 125 NI factories.

Envisaged risk	Whether materialised	Response /preventive measure undertaken, including evaluation remarks
support on Safety Committees (SCs) by BGMEA /BKMEA do not include majority of NI factories		However, it remained unclear how master trainers supported SCs of NI factories and what results (in terms of capacity and behaviour change) were achieved. BGMEA /BKMEA will need continued facilitation for follow ups with their members on these issues.
No funding for new labour inspectors	Yes	DIFE continues to remain dependent on the programme (ILO) for foundational and other trainings to the newly recruited labour inspectors.
IT tools (LIMA, OSS, RCC tracking system) do not provide adequate data	Yes	Regular follow ups with DIFE and upgradation of IT tools and infrastructure to ensure their suitability to capture relevant data. However, user-friendliness and promotion among users for greater use is still needed.
LIMA data breach by hacking etc.	No	Cybersecurity training to concerned officials and departments; LIMA 2.0 with built-in security features.
Low motivation to join OSS – BFSCD and other agencies	Yes	IT infrastructure integration support provided; advocacy and coordination with departments; however still is a continuing risk /challenge.
Low perceived contribution of the programme on creation of LIMA	No	Text in LIMA clarifying contribution of different agencies towards it support
Low commitment on gender mainstreaming by GoB agencies and social partners	No	Systematic situation analysis and gender roadmap support provided to different GoB agencies
Corruption and fraud	No	Close monitoring of budget allocations and expenditure by implementation agreement partners.
Factories show low commitments for remedial actions and workers welfare, beyond meeting compliance standards	Yes	This risk was not envisaged. BW, RSC and Nirapon worked persistently to ensure that safety and social compliance results in worker level welfare. This was less evident in NI factories where the focus was mainly on safety compliance. Mindsets of factory management are changing in a subset of factories. More advocacy with factory management is needed. Similarly, more empowering actions are needed for Safety Committees, Participation Committees, and other representative mechanisms where workers welfare issues can be discussed and negotiated.
NI factories do not have the necessary capital to fund their remediation	Yes	This risk was not envisaged. NI factories faced challenges in funding their investments required for remediation. A remediation finance initiative was designed but did not attract any takers. An assessment of continued need for remediation finance and rebooting remediation finance is likely to be needed.
Different structures create inefficiencies and	Yes	This risk was not envisaged. The programme promoted different structures (RCC, ISU, OSH units) and there

Envisaged risk	Whether materialised	Response /preventive measure undertaken, including evaluation remarks
vested interests		were several ongoing initiatives (DIFE-NI, BIDA-FBCCI, RSC, Nirapon, BW, and own initiatives of BGMEA and BKMEA), which obviously have potential for confusion, not least for the factories receiving different audits. Programme facilitated linkages and integration through Industrial Safety Forum (May 2022), which needs ongoing support for continued operation.

Source: Evaluation assessment based on the programme risk register (Nov 2022)

Some other (non-envisaged) risks materialised but programme was reasonably effective in responding to them: It is common for programmes to encounter unforeseen risks and challenges during implementation. The new risks emerged due to changes in the project's context, stakeholder dynamics, and some external factors beyond the programme's control. It was essential to take stock of these risks in terms of their impact on project outcomes. As shown in the table 4, some non-envisaged risks emerged during the course of the programme. Factory's token commitment to meeting the safety compliances without a real commitment for workers' welfare was evident in several NI and other factories. Given the intense nature (regular interactions with factory management), the BW model was well-placed to notice such dissonances. BW and to some extent RSC and Nirapon could notice such instances in their interactions with factories and promote better awareness and advocacy with the factory management. However, this is a continuing risk and more advocacy with factory management would be needed. Similarly, more empowering actions are needed for Safety Committees, Participation Committees, and other representative mechanisms where workers welfare issues can be discussed and negotiated.

The risk of NI factories not having the necessary capital for funding their remediation /CAP activity was not envisaged but it did happen. The programme responded well by facilitating the offer of a remediation finance in collaboration with KfW, GiZ and other financial institutions. However, there were few takers for this offer of remediation finance as it was not designed based on the situation of NI factory owners. The product required documentation (such as collateral) which many of the NI factory owner could not provide as most of the NI factories are housed in rented floors of a building. The other reasons for not taking up the remediation financing offer was also reluctance of factory owners to open their books to scrutiny and the high interest rate imposed by the Bank of Bangladesh. It is to be assessed whether there is a continuing need for remediation finance and if so, what kind of products (potentially with credit risk guarantees) can be offered that meets the specific requirements of NI factory owners.

Another non-envisaged risk that happened was related to different structures and initiatives that created confusions, duplications, inefficiencies, and sometime vested interests. The programme rightly promoted several structures such as RCC and then ISU, OSH units within DIFE. Several initiatives developed organically over the years, serving distinct segment of supply chain factories for international buyers, it was observed by the evaluation that there are some implicit competitive pressures among the private sector initiatives (RSC, Nirapon, BW) in terms of acquisition of factories, especially those which have multiple buyers. A continued facilitation from the programme would be needed to ensure different structures and different initiatives work in tandem.

The outbreak of the COVID-19 pandemic was not something that could have been predicted. The extent of its impact on the programme could not have been assumed beforehand, as the pandemic caused significant disruptions globally. Consequently, the working approach of the project had to be shifted from field-based activities to desk-based operations due to lockdowns, travel restrictions, and social distancing measures. This unexpected risk had an adverse effect on the project's implementation and necessitated adjustments to adapt to the new circumstances.

Additionally, another significant risk that materialized was the withdrawal of approximately USD 2 million in support from the Department for International Development (DFID). The exact reasons behind this withdrawal are not specified, but it indicates a loss of financial resources and external support for the programme. This loss may have impacted the programme's progress, implementation capacity, and ability to achieve its intended outcomes.

The programme design was focussed on 'remedial' actions and less so on 'prevention' actions: While remediation was one of the main focuses of the programme design (and rightly so), some of the real issues of building safety originates before the buildings are occupied. Some of the key informants argued that in the long-term, 'preventive' approach can work better than the 'remedial' approach. Structural integrity and site safety comes under Building Code Authority (Ministry of Housing and Public Works) even before the buildings are occupied. The Building Code regulation start when a building design is submitted, and a permit is expected to be issued for compliance of building with structural integrity, fire safety etc. That is where some of the major lacunas are in terms of regulation and enforcement. RMGP II supported regulation improvement in the 'remedial' part of the safety chain and therefore worked more closely with MoLE /DIFE. However, RMGP II design and actual interventions received less focus on 'preventive /root' part of the safety chain. Though in later course of implementation of programme, some design adaptations happened as the programme started working with RAJUK, CDA and city corporations (as part of BIDA OSS initiative), but their actions were also more 'remedial' than 'preventive' in nature. Evidently, more programmatic actions /support were needed at the 'root' part of the safety chain.

3.3 Coherence and Synergy

Synergies and leverage (EQ 7 and 9)

The programme canvassed a wide array of institutions for synergistic remediation efforts in the NI factories: Ensuring industrial safety in the RMG factories needed efforts and participations from an array of institutions. RMGP II supported all relevant institutions such as DIFE (including RCC, and now ISU), BFSCD, BGMEA, and BKMEA to ensure an effective remediation effort across the NI factories. Building synergy among these institutions was very important for ensuring that, a) remediation capacities are strengthened, b) remediation tracking is carried out effectively and c) escalation protocol is wisely developed and implemented.

The RMGP II interventions were reasonably coherent and synergistic, though some gaps were witnessed: The ILO in Bangladesh designed three main initiatives – RMGP II, BWB, SDIR (including WRC) All have the ultimate aim to improve safety and working conditions in the RMG factories. The designs were synergistic as apart from remediation efforts in selected NI factories, RMGP II mainly operated at policy and legislative levels, while BWB, SDIR and WRC operated at factories and workers levels to directly improve safety and social compliances at RMG factories by strengthening capacities, management systems and mechanisms (such as trade unions, safety committee, participation committee, Welfare Officers, anti-harassment committees) to deliver better workplaces. All initiatives were operational during the timeframe of RMGP II (2017-2023) providing added benefits of combined effects of a cluster of initiatives /projects in the country. There was some overlap in terms of factories covered by each of these initiatives, however the overlap between RMGP II and BWB factories was not much as these two initiatives focussed on different type of factories. BWB worked with larger and export-oriented factories (441) while RMGP II focus was on smaller tier 1 (direct supplier to international brands) or tier 2 (supplier to tier 1 factories) NI factories (1549). SDIR promoted social dialogue and harmonious industrial relations in 320 non-unionised factories while WRC strengthened capacities of trade unions in 117 factories to better serve their members and workers. SDIR coverage of factories were all from the NI factories while WRC worked with several NI factories.

RMGP II also facilitated the transition of Accord and Alliance to nationalized initiatives - RSC and Nirapon respectively – without a notable interruption in their respective lines of work. RSC as a private initiative of RMG manufacturers, global brands and retailers, global unions and their local affiliates focussed on factory inspections, remediation monitoring, safety training, and independent safety and health complaints mechanism (factories that subscribe to BWB have broader ambit of social compliances). Nirapon continued to work with CAP-closed factories, investing in engineering safety solutions and guiding and educating employees, managers, and owners. Some of the 335 factories under Nirapon that have not yet reached CAP closure are either brand-new or have been retained from the Alliance. Once the CAP is closed, the factory enters the Nirapon Safety Management Programme, requiring factories to undergo a variety of safety and social compliance audits. NI factories too came under initially to a temporary institution RCC and finally to ISU that has mandate to inspect all aspects of safety not only to the NI factories but also to other sectors of the country. Overall progress of remediation is yet low (54%) in comparison with the factories under RSC and Nirapon, however, now with 754 closed and 113 relocated factories, the rest of the factories are monitored by DIFE.⁸ The issue of joint monitoring by DIFE with other initiatives (RSC and Nirapon) brings the differential standards of monitoring being carried out by the initiatives, especially when LIMA inspection module and checklists have been institutionalised. DIFE is the authority of the inspection of all factories, shops, and establishment in the country, however DIFE's cooperation modalities with RSC and Nirapon are not yet fully developed to take charge of all the safety and social compliance issues in export oriented RMG factories. Some key informants argued that ongoing initiatives (RSC, Nirapon, BW, NI) are currently operating on parallel tracks, serving different segment of factories, different brands and buyers from different export markets (USA and Europe). It is well acknowledged that these initiatives have organically developed and are important contributors to ongoing reforms in the RMG sector. On the compliance spectrum, the initiatives range from safety (DIFE-NI, BIDA) to safety+ (RSC and Nirapon) to social compliance (BW). There is presently no initiative working on environmental compliance. The initiatives' compliance protocols and checklists generally align with BLA /BLR, but it is unclear if they adhere to a uniform code of conduct, as there is room for improvement in existing laws (BNBC, Fire Act, BLA) in Bangladesh for comprehensively defining and addressing safety, social, and environmental compliances. Nonetheless there are ample unrealised opportunities for these initiatives to improve their linkages and learning from each other. Also, some dissonance was observed in the way factories in Export Promotion Zone (EPZ) follows a set of rules than those outside EPZ, which comes under BLA.

3.4 Efficiency

Efficient and strategic resource allocations, gender budgeting (EQ 13, and 15)

The programme achieved 'right' allocations across different strategic areas, including on gender aspects: In the ProDoc, it was envisaged that remediation and industrial safety would represent more than 40% of the total direct costs of the programme while complementary initiatives in labour inspection and OSH were expected to amount to 13%. Total costs incurred for Better Work after applying the revenue were expected to be 7%. However, the budgeting was flexible as ProDoc expressed that “*depending on status of progress and needs arising, funds can be further redistributed amongst the different strategic areas*”. Looking at the financial situation up to May 2023, the actual spend have more or less played out as envisaged in the ProDoc. A similar actual spend proportion is observed (see the

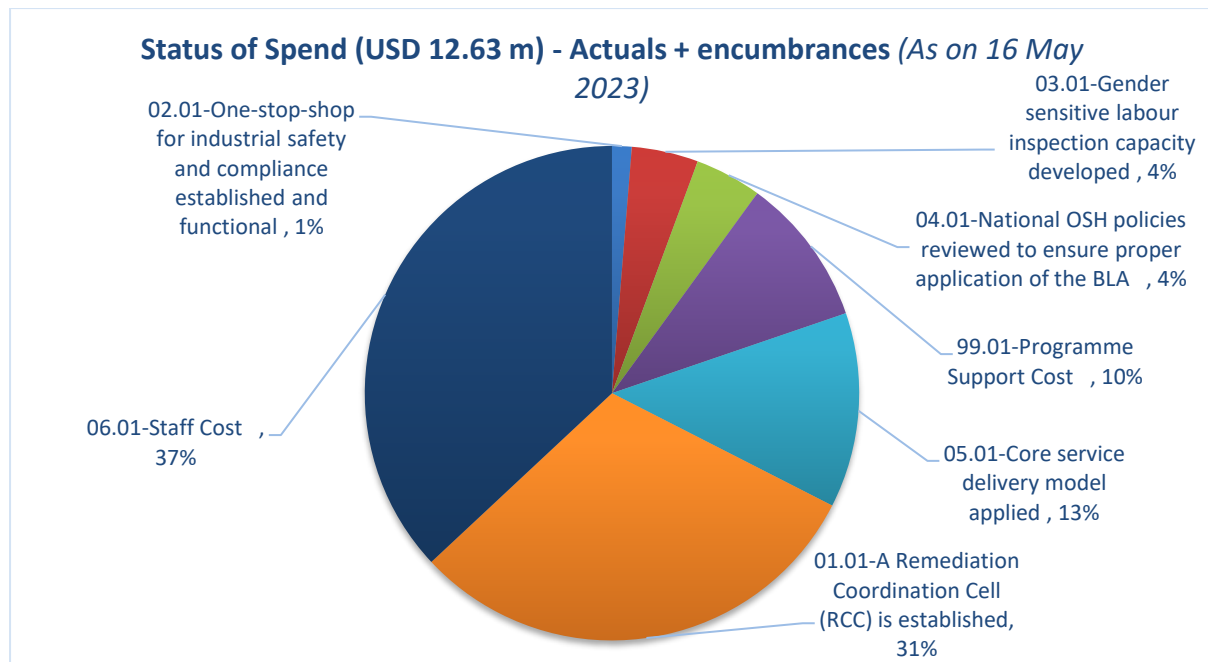
⁸ If RSC or Nirapon stop working with a factory for one reason or other (normally due to escalation) then they get transferred over to DIFE.

figure 3). Remediation accounted for 31% of actual spending. As noted in the ProDoc, “remediation is a highly technical area with significant potential liability concerns. As such, the programme subcontracted the work to a private firm which has the appropriate professional qualifications and can support the development of enhanced capacity in the technical staff of the responsible government agencies is the preferred delivery mode”. This was cost-intensive. This approach also ensured development of technical capacity to deliver remediation within the country.

The other three strategic areas accounted for about 10% of total spending. Given the requirements of ensuring remediation for 1549 NI factories, a higher proportion of spending on first strategic area looks justifiable. It is also true that other strategic areas had less budget needs as most of the involved developing policy documents, protocols, trainings which were taken care of by the staff costs (37%) and programme support costs (10%). As there are no gender markers in the budget utilisation sheets provided to the evaluation, it is difficult to assess budget allocations on gender across each strategic area. However, it is clear from different assessments presented in other sections of this report that gender was fully mainstreamed in all activities of the programme and so it is expected that gender budgeting was adequate and flexibly available to the programme team based on emerging requirements.

The programme delivery was not smooth as Covid-19 seriously affected programme activities and utilisation of budgets. However, after a brief stopover (due to lockdowns in the country), the programme continued to deliver its remediation and other services in online /virtual mode.

Figure 4. Status of actual expenditure across main budget heads (2017 to May 2023)



Source: Evaluation analysis based on the financial data provided by the programme

Value for money (EQ 16)

The programme has delivered a good ‘value for money’ overall but could have done better on ‘equity’: As explained in the methodology (section 2.4, figure 3), the VfM assessment is conducted based on the following four parameters:

- **Economy**⁹: The programme has achieved ‘economy’ through the use of best practice, especially via large procurements and savings generated through negotiations. The ILO

⁹ Procurement of inputs at the most appropriate price and quality

has used competitive bidding processes for all of its contracts and was able to reduce the contract value by 5-10% in each procurement through such negotiations.

- **Efficiency**¹⁰: Except a few (e.g., remediation targets), the programme has achieved most of its stated outputs in the logframe. Though there were some delays (due to Covid-19 related disruptions), the programme was brought on track through investing more in digital technologies. In fact, the core programme outputs in terms of LIMA and OSS are expected to improve efficiency of labour inspections, safety-related licensing of factories, remediation of factories on their CAPs, and for complaints handling and redressal. These mechanisms improve programme efficiency for per unit of cost. The BW have supported setting up of Participatory Committees (PCs) and Safety Committees (SCs) at factories, across 400+ factories. Effectively functioning PCs and SCs can improve the process and efficiency of factory assessment and correction actions.
- **Effectiveness**¹¹: Through improved regulation and policy framework on remediation and OSH, the programme has set in enabling conditions to achieve effectiveness. The programme has inculcated a culture of public private partnerships between DIFE and industry bodies (BGMEA, BKMEA, FBCCI). BW work in factory level systems is directly improving the welfare of the workers. Clearly, the programme has promoted a safety culture throughout the RMG sector.
- **Equity**¹²: The programme's work with 1549 NI factories (which have several tier 2 factories) demonstrate certain level of 'equity' in its work even though there are large number (at least 1000+) other small and medium RMG factories which are still not covered by any initiative. It is also not clear how shifted factories are supported for remediation. In terms of engagement of women workers, BW's Mothers@Work and GEAR initiatives are providing need-based support. However, the programme has so far given less attention to people with disability who may be workers in the RMG factories. There is very limited data on this aspect, with certain BWB activities (Integrated Advisory Solution Workshops) focused on building awareness on this within its member factories. Also, youth as part of programming have only recently been initiated.

3.5 Effectiveness

Effective programme performance (EQ 10)

The programme made significant progress across all strategic areas and achieved most of the logframe targets, though with a few cases of shortfall: There is significant internal (progress monitoring reports) and independent (outcome and legacy studies) evidence demonstrating high level of performance, except in a few areas, of the programme against its logframe. The evaluation has summarised all the evidence in Annex 4. A synthesis of performance data is presented below, for each strategic area:

Strategic Area 1 - Ensuring factory safety through remediation: As per the outcome target, the programme aimed to 100% remediate all active factories (658) of the target 1,549 NI factories. The progress of 54% remediation¹³ has been achieved in all active factories i.e., 54% of original non-compliances have been remediated in 658 active factories. Some of the factories which made good progress, and which would have likely improved remediation progress of 54%, were transferred to RSC and Nirapon. The other reasons of short-fall are cited¹⁴ as, a) shortage of manpower of DIFE, b) Covid-19 impact and c) ineffective application of the escalation process. The overall average of 54% CAP completion progress is driven by

¹⁰ Conversion of inputs (programme costs and activities) into outputs (first level programme results)

¹¹ Outputs achieving the desired outcomes such as workplace safety, social compliances, and welfare of workers

¹² Inclusion of most vulnerable factories (tier 2 /NI) and workers therein and also addressing women, youth, and disabled workers if they are marginalised

¹³ 54% remediation progress is the corrected data after private sector agency involved in verification found gaps in the remediation data. Some of the data certified that remediation is achieved but private agency verification did not find this to be the case. About 30% this kind of mismatch with the data was found and corrected.

¹⁴ In programme progress report and outcome study

good progress achieved in Cat1 factories. The progress in Cat 2 and 3 factories is much lower and is a point of concern, for example, 55% of active factories have achieved less than 50% progress on remediation. Further, as reported by the outcome study, MoLE has decided to carry on the remediation work for category 2 (including category 3) NI factories from June 2021 till December 2026. As against a target of 100 per cent, the programme has managed to escalate 42 per cent of category 3 factories to rounds 4–6. It is understandable that NI factories have much lesser incentives (no buyers pressure e.g.) and resources (financial capacity) for change than RSC and Nirapon factories (where CAP completion is seen at upwards of 90%). Of the other factories, 754 have been closed, 13 joined private initiatives, 113 relocated or shifted. Withdrawal of Utilisation Declarations was requested by DIFE for 238 factories. Of these, 135 factories have been suspended by BGMEA and 47 other closure order issued.

Establishment of an Industrial Safety Unit (ISU) to replace RCC is another significant achievement. ISU will now monitor safety aspects in all industrial units. The programme also developed a model factory design guidance with support from Bengal Institute (BI) for Architecture, Landscapes and Settlements.

The programme has also supported development of LIMA 2.0, which is expected to address the causes of data scarcity in the Remediation Tracking Module (RTM). The programme progress report indicates that the RMG wing at DIFE is nascent and can in due source develop synergistic links with RSC, Nirapon and other private initiatives.

Strategic Area 2 – Governance: To improve labour inspection governance, the programme supported a cross-department initiative of One Stop Service (OSS) which was established and was made operational during this phase of the programme. Several Government departments (DIFE, CDA, RAJUK, BFSCD) linked their online systems with the BIDA's OSS. Further, a process simplification was carried out through one form for five services for ease of doing business in Bangladesh. Currently, 60% of licensing by the RMG factories are being obtained online, including through OSS. Based on the capacity and training needs assessment conducted as part of developing OSS integration roadmap, the programme also delivered the cyber security training for the departments involved. While it is recognised the programme mandate is about improving governance of industrial safety and by that logic, any support for digitalisation initiatives that improve efficiency of regulation by the Government is justified, as it can in the long-term improve industrial safety. However, this is already part of Digital Compliance /Smart Governance agenda of the Government of Bangladesh. The key informants argued that the programme can invest only in select areas which can not be supported by the Government's own budgets.

The outcome study observed that OSS operationalisation continues to face organizational and technical barriers and more inter-departmental and inter-ministerial coordination among the government bodies will be required to get these agencies to work through one platform.

The programme also initiated the development of Industrial Safety Framework with MoLE. Several capacity building of DIFE staff (24 master trainers, 387 labour inspectors) were carried out. 6 SOPs were further updated and are being incorporated into a single document. A draft labour inspection policy is being developed and a strategic compliance plan is being prepared.

A female labour inspectors conference with 81 female LIs was organised. A gender roadmap was developed for DIFE. 120 fire services professionals (18 female) and 237 (29 female) DIFE officials enhanced their knowledge on gender equality.

LIMA was operationalized in all 23 offices of DIFE across the country, resulting in the use of LIMA for all inspections. With all of these accomplishments, there are few areas of further work in this strategic area.

While DIFE institutional capacities are getting strengthened through several RMGP II interventions, translating these capacities into strategic inspection planning and implementation remains a challenge given the enormity of the tasks (RMG and non-RMG) for

the DIFE. The capacities and resources are still limited. DIFE still looks up to ILO for continued support on capacity building, equipment, and other resources. DIFE budgets (demonstrating Govt commitment) have increased over last the 10 years, by at least five times. But this is still not adequate (more posts to be sanctioned). Further, gender roadmap implementation at DIFE requires considerably more efforts in the coming years. Also, RSC and ISU engagement links would need to be further developed ensuring synergies.

Strategic Area 3 - Occupational safety and health: Significant achievements are reported in national OSH profile and policy documents. There have also been efforts on making OSH as Fundamental Rights (in different forums - National Council for Industrial Health and Safety level discussions). Capacity building of industry bodies (FBCCI safety cell), trade unions and employers' representatives have been carried out. The programme has trained master trainers at BGMEA and BKMEA who trained up 820+ Trade Union and Safety Committee members from 125 factories. The programme intent of 'OSH in policy and practice' means improvement at all three tiers (Policy, Factory and Workers). While policy and factory level improvements are well evident, there seems to be lack of data on how trained safety committees are more effective than those not trained. More importantly, how safety committees have improved OSH compliances at factory and how awareness and action at worker level have improved their well-being.

The outcome study observes that in the case of licensing and use of complaint reporting online, there is still scope for progress. Also, online system for accident and injury reporting is rarely used.

Furthermore, it is known that BGMEA and BKMEA are implementing a number of donors funded projects. Once a funding is finished, the team at BGMEA and BKMEA will move on to other funded activity. There is a possibility that after training OSH to factory management and safety committees, there is a very limited follow-on monitoring and support provided to see the process of capacity building leading to practice and behaviour level changes.

Strategic Area 4 - Better Work Bangladesh: improving working conditions and productivity: BW has expanded to 441 factories (up to March 2023), employing 1,273,646 workers, 50% of whom are women. BW is working with 321 PCs, 284 SCs. 646,247 workers (56 percent women) elected 3,504 PC representatives. 47% women elected as PC representatives. DIFE monitoring report on SC indicate that 79% SCs out of 1486 factories operated in accordance with the BLA amended in 2018. An assessment of functionality and effectiveness of SCs, as per the outcome study, indicate a considerable scope for improvement. Clearly, a detailed assessment of functionality and effectiveness of PCs and trade union would be needed.

103 factories have been guided to develop maternity rights and breastfeeding policy in line with national laws and international labour standards. 625 female machine operators have been provided with training to capacitate them for career progression, of whom 395 (63%) have been successfully promoted to supervisory positions.

191 Master Trainers- comprising 30 officials from Department of Labour and 161 from employer and worker organizations- have so far been developed through Learning Hub. Towards building sustainability and ownership of factories in areas of compliance, Better Work has so far trained 121 Welfare Officers from 114 factories, and developed 166 Factory Ambassadors from 87 factories, who are now acting as change agents in the pursuit of compliance in their respective factories.

ToTs were conducted on Leadership Skills development for worker representatives (TU & PC). A total of 165 representatives (82 female, 83 male) from TU, PC, Sexual Harassment Prevention (SHP) and SC of 27 factories were trained over this period. With the overarching objective of strengthening the leadership skills for the worker representative to ensure workers voice, inclusive economic growth, and overall labour management relationship, both males and females were trained on facilitation of a conducive environment at workplace, and raising

of their concerns, suggestions, and workplace issues in more structured way to lead a stronger social dialogue mechanism.

BWB revenue model already shows 56% cost recovery, with assessment report subscription by brand partners standing at 385, with 30 buyers /brands affiliated with BWB. Average NC rate on publicly reported issues is 19.58%.

BW has unveiled a new factory engagement framework transferring ownership to industry stakeholders and BWB taking the role of convenor. If the BWB becomes the convenor, then the structural modalities of delivering the advisory support would drastically change. This is being worked out.

Overall, the programme's outputs in terms of policy /strategy documents, frameworks, tools, and advocacy materials are very impressive and can have utility beyond RMG and beyond Bangladesh: The programme has contributed to development of remediation Strategy (2017), ISU-RSC Framework, ILO- Industrial Safety Framework, OSH strategy, NPA, DIFE roadmap, DIFE gender strategy, SOPs for DIFE, factory design guidance, several research reports, videos, publications etc. These capacity-building resources also include training modules, guidelines, information, communication and educational (ICE) materials. These documents have clearly assisted stakeholders towards framing their plans and interventions. These knowledge resources as programme outputs clearly have larger and broader relevance beyond RMG sector and beyond Bangladesh.

Effective stakeholders' participation and contribution (EQ 11, 14 and 17)

At the macro level, the programme effectively engaged and empowered partners, and institutions though they would need continued support: RMGP II collaborated with the government to improve the legal and regulatory framework and to design and implement effective enforcements in the RMG sector. The programme assisted the government in resolving non-compliances in NI factories (with 54% achievement rate), enhancing safety regulations, and expanding DIFE capacity. A number of regulatory bodies and service providers—BIDA, DIFE, BFSCD, RAJUK, and CDA, explored interlinkages between existing licensing services provisions and collaborated closely with the RMGP II programme initiating digitalized One Stop Service (OSS) for industrial safety. The national plan of actions (NPA) on OSH, national profile, widespread OSH awareness, and establishment of the National Occupational Health and Safety Training & Research Institute (NOHSTRI) demonstrate the commitment of government ministries and agencies to workplace safety. The programme also brought all the stakeholders together under one platform called 'Industrial Safety Forum (ISF)'. The ISF provides the space of dialogue for a credible and accountable industrial safety governance in RMG and beyond. The continuation of organising the ISF can allow coordinated decision-making among stakeholders for ensuring industrial safety in Bangladesh. The government BIDA (along with other departments) and with FBCCI conducted nationwide inspections of risky manufacturing units (5206) beyond RMG and have designed a system of addressing non-compliances observed. These instances demonstrate success of programme engagement with partners and institutions at macro level. But as can be expected, while DIFE's institutional capacities are strengthened, beyond doubt as several key informants acknowledged this, translating these capacities into strategic inspection planning and implementation remains a challenge given the enormity of the tasks (RMG and non-RMG). DIFE's capacities and resources are still limited for the mandate entrusted to them. DIFE still looks up to the ILO for continued support on capacity building, equipment, and other resources. Similarly, OSS still have many gaps (highlighted in later sections) in technology, people and processes requiring continued programme support in the designated areas.

At the meso level, the programme partnered with industry associations to support their member organisations towards improved safety culture with some success: RMGP II collaborated with industry associations (BGMEA and BKMEA) to provide technical assistance to their members, and to play an active role in the remediation of NI factories. The associations provided OSH training to their members and established and supported safety committees.

The industry associations were able to fulfil their duties in the programme to a large extent on both counts – OSH and safety committee training and remediation support. However, the industry associations' competing mandate made it difficult for them to completely commit to closure of the NI factories lacking adequate remediation. BGMEA and BKMEA were primarily concerned with promoting remediation rather than closure. Also, BGMEA and BKMEA gets number of donor projects for supporting their members on different fronts, which is why they complete their activity (such as OSH training or safety committee support) and move on to other funded projects. This means that limited follow up monitoring and support happens, post-training and it remains unclear to what extent member factories have improved in terms of their OSH practices and functionality of their safety committees.

At the micro level, the programme involved and engaged with the workers' organisations, though not in a mainstreamed way: Through BW, SDIR (and WRC) initiatives, the programme engaged with the workers organisations to stimulate social dialogues among RMG employees and entrepreneurs. However, these processes were happening in a limited number of overlapped RMGP II NI factories, RSC or Nirapon factories. The focus of RMGP II was more on macro and meso levels and less on micro level engagements. The Bangladesh Employers Federation (BEF) and the workers' organizations (NCCWE and IBC) were not involved in programme implementation, as RMGP II was cited as a policy-focused initiative. Workers' organisations were involved with the BWB's awareness-raising initiatives and felt the need for workers' active participation in capacity-building activities, awareness on safety and labour standards, and participation in social dialogue processes. The assumption that combined effects of different initiatives (RMGP II, SDIR, WRC, BW) will ensure effective participation of workers organisations (safety committees, trade unions, participation committees) at factory level has not turned out to be completely valid. A gap remained which also partly explains the so far limited impact of the programme on working conditions and well-being of the workers in the RMG sector.

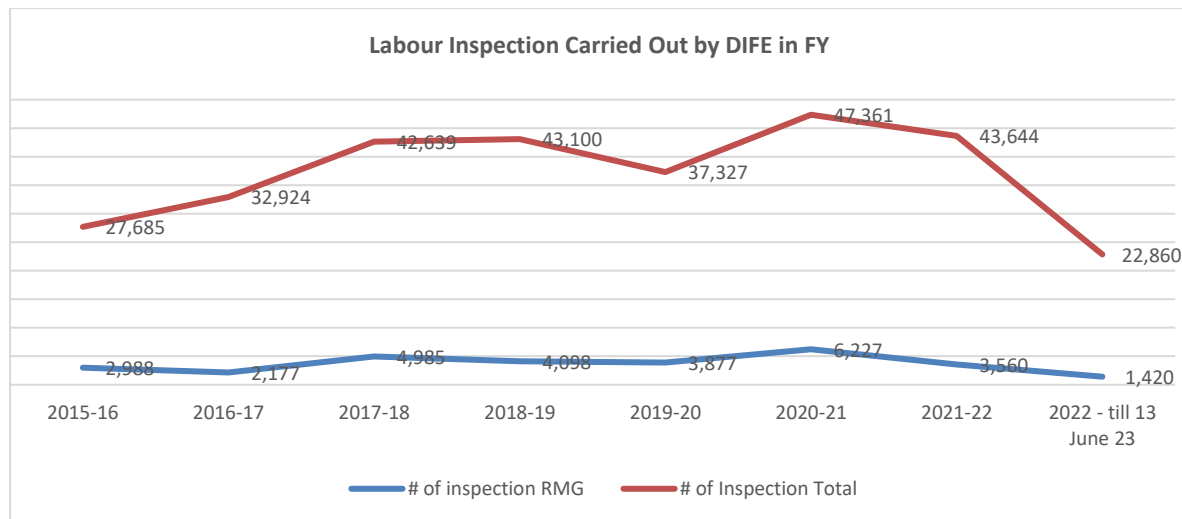
Effective execution of programme strategies (EQ 12 and 34)

The programme significantly enhanced DIFE's institutional capacities and systems: The programme support was oriented toward the remediation of all NI factories, the enhancement of the DIFE's capacity for an effective and improved labour inspection system. The programme enhanced the government's capacity to deliver improved industrial safety regulation and inspection system and remediation activities. Evidently, DIFE's institutional capacities, structures and systems have considerably improved. DIFE is moving towards a function-based organisation for implementing labour inspection reform roadmap. Structural changes happened with the set up with ISU. DIFE enforcement capacity has significantly increased with higher number of inspectors and regional /district offices involved in inspections and remediation. Following the transition of RCC to the current ISU in the department's safety wing, 13 engineers are assigned to the ISU. All inspectors have received foundational training supported by the programme. In addition, more than a hundred inspectors have received training in OSH, risk assessment, and risk management. 24 DIFE engineers received special training on effective inspection on fire, electrical and structural safety, and have become master trainers. Further, the programme supported DIFE with equipment provisions such as 100 motorcycles and 20 mopeds (for female inspectors). In addition, DIFE was supported in preparing a number of strategy documents that include labour inspection reform roadmap, gender roadmap, labour inspection strategy, and inspection checklist. Six Standard Operating Procedures (SoPs) have been developed for DIFE with the support of the programme that includes accident management; issuing and renewing licences; complaint management; factory layout plan, occupational diseases, and accident investigation. These SoPs are likely to improve effectiveness of the DIFE's operations.

Translating DIFE's enhanced capacities into strategic inspection planning and implementation remains a challenge given the enormity of the tasks (RMG and non-RMG): The newly formed ISU still have very limited capacity in terms of human resources. Overall, human resources at DIFE across all sectors remain limited given the enormity of the

mandate as the DIFE is responsible for inspecting all shops, establishments, and factories in the country (44868 registered establishments; see figure 3 for the trend in labour inspections over the years). Labour inspectors, by their vary role, are not expected to be experts in building or fire safety and structural integrity. It goes to the achievement of the programme to develop this expertise among the labour inspectors. Beyond the technical skills, there was a requirement of a 'culture and mindset change' within DIFE as this sector-wide reform required DIFE to work with the private sector closely to monitor and enforce compliance, integrate gender aspects in all its operations and initiate a process of mindset change among its labour inspectors.

Figure 5. Trend of annual labour inspections by DIFE



Source: DIFE annual reports

This is an ongoing process and would require further investments by the GoB /MoLE and DIFE to ensure enhanced technical skills along with cultural and mind-set transformations can make DIFE a more impactful organisation. Further, many key informants argued that as a government establishment, DIFE’s focus is on providing the regulatory framework and oversee a process of ongoing compliance and enforcements. It does not mean that DIFE would need to directly be involved in enforcements as it can work with a range of private sector initiatives and external partners (who have the necessary expertise) to carry out the inspection and enforcement function on its behalf. The programme supported DIFE in this direction (through BV). It is not clear whether DIFE can undertake these partnership strategies on its own once the programme support is completed.

LIMA as an integrating platform has demonstrated its potential, though it needs further development and use-promotion: Labour Inspection Management Application (LIMA) provides DIFE a digital tool for integrating its services through the different modules. LIMA has been successfully tested and scaled up during RMGP II. The number of factories receiving their license using LIMA has significantly increased from 633 (2019-2020) to 1299 (2021-2022). However, factories sharing their data in LIMA is still limited. Worker’s involvement in LIMA is still limited as only 71 complaints were reported in three years (2020 to 2022). Clearly, LIMA needs promotion at various levels for increasing its usage. LIMA 2.0 is being developed now with support from GiZ which is likely to have more user-friendly options. Similarly, LIMA 2.0 will further develop Remediation Tracking Module (RTM) and inspection module in such a way that it can achieve its potential for effective tracking for RMG and beyond.

One Stop Service (OSS) brings together different government services but that is also its challenge for ensuring effective functionality: OSS is a partnership and collaboration with different ministries and agencies led by BIDA, and includes DIFE, BFSCD, RAJUK, and

CDA are linked to the embedded online system for industrial safety. This phase of the programme addressed several coordination and collaboration issues within different departments of the Government. An OSS roadmap (with plan to include 20+ agencies in its fold) was prepared which planned to address people, process, and technology issues to effective implementation. It is clear that digital compliance and smart governance need incentives for the players to participate more diligently. As digital compliance and smart governance increases transparency and accountability, some of the agencies are reluctant to participate. While supply-side digital infrastructure (such as LIMA, OSS) has been duly established through the support of the programme, overcoming demand-side challenges in terms of cultures (transition from face-to-face dealings to online transparent dealings), adequate incentives for change is still a work in process.

OSH in policy and practice has been implemented well with heightened awareness levels across the board: The programmes have substantially supported integration of OSH into the RMG sector organisations, with OSH units established across the board in Government (DIFE) and industry organisations (such as BKMEA, BGMEA, FBCCI), at factory levels (especially in BW factories) and at worker levels in terms of safety and participation committees. The programme's assistance in implementing remediation throughout the RMG sector has resulted in heightened awareness. RMG factories (mostly BW but also some of the NI factories) have started prioritising workplace safety. The programme has engaged constituents in a variety of activities that have raised awareness and knowledge of employers' and workers' organisations on OSH issues. In this endeavour, the programme has used numerous awareness-raising materials, posters, videos, and infographics.

The programme has partially or completely acted on all the recommendations of the Mid-Term Evaluation, except the one related to remediation finance: The Mid-Term Evaluation (MTR) proposed seven recommendations. At final evaluation, most of these recommendations have been acted upon, except the one on remediation finance. A detailed assessment of action taken on the MTR recommendations is provided in the table below:

Table 5. Action taken on the MTR recommendations

MTR Recommendation	Final evaluation's assessment of the action taken
The ILO should focus remediation interventions on longer term DIFE capacity building related to the ISU and strengthen NI factories access to remediation financing	The programme continued to strengthen DIFE /ISU. However, procedural delays at the Government level have blunted the effectiveness of programme support to DIFE /ISU. Remediation finance work (738 NI factories received information) phased out in 2019 as per tripartite and donor agreed plan; initial experiences were not encouraging but remediation finance may have a continued relevance.
Ensure OSS is a balanced intervention – people, process, policy, and technology	The programme continued to support /facilitate OSS functionality on all aspects (people/process/policy and technology). However, OSS integration continued to be beset with procedural delays and reluctance of Government departments to align their systems.
Strengthen RMGP II interventions to build labour administration capacity to set inspection priorities and implement holistic strategies to improve compliance	The programme continued to strengthen LIMA with the next version (2.0) launched during RMGP II. While adoption have improved across different labour inspectorates at district level, LIMA 2.0 is still a work in process. This is so as use of LIMA data to set inspection priorities is still limited.
Make BWB more visible and relevant to national level RMG stakeholders	BWB continued its expansion and dialogue with buyers and national level RMG stakeholders. However, actions are less visible on establishing linkages between social compliances and workers productivity based on the BWB data. Similarly, more actions are

MTR Recommendation	Final evaluation's assessment of the action taken
	needed in terms of influencing agenda and exit strategy.
Build ILO post Covid-19 strategy to support RMG sector recovery using "cluster approach"	An integrated programme interventions based on sector-wide theory of change was conceptualised but in practical reality, integration was less achieved.
Capitalise more strongly on the ILO's significant presence in the RMG sector and capacity to convene tripartite stakeholders and foster social dialogue on important issues affecting RMGP II progress and sustainability	The programme continued to capitalise on the ILO significant expertise in the RMG sector and have well supported its tripartite constituents.
Strengthen overall project management	The programme conducted a detailed risk analysis and carried out considerable mitigating measures to ensure that the programme intervention remain on track despite several contextual risks and challenges.

The programme engagement with its constituency for influencing power relations and for women empowerment were in the right direction though still too early to expect impact. The programme documents and key informant interviews clearly establish that several partnerships and collaboration (see table 5) for influencing power relations and for promoting women empowerment. The programme collaborated with the UN Women and conducted a major study¹⁵ on gender composition in the RMG Sector. The programme also collaborated with the Ministry of Women and Children Affairs and Bangladesh National Woman Lawyers' Association (BNWLA) for policy advocacy on the new law on sexual harassment and the promotion of C190. Achieving impact on these issues takes time as beyond activities and interventions, power relations generally change when changes are observed in social norms, behaviours, and mindsets. It is too early to expect impact even though the programme efforts were in the right direction.

Table 6. Programme intervention influencing power relations between women and men, and promoting women's empowerment

Dimension and indicators	Achievement Levels*	Findings & Explanations
Partnerships Programme's engagement with its constituency for promoting power relations and women empowerment	Level 3: Exceeds minimum requirement	Several examples of programme interventions indicate that it influenced power relations between women and men and promoted women empowerment in different spheres of its activity. These are: <ul style="list-style-type: none"> - Capacity development initiative of DIFE (gender roadmap 2020-30), BFSCD (Fire safety training for female firefighters) - Online complaint mechanisms (RSC, Nirapon, LIMA) - Building capacity of female Trade Union leaders on gender and OSH issues. - Targeted training with factories and in partnership with brands, tackling violence and harassment at work, including sexual harassment, has taken centre stage and continues to be reinforced via ongoing advisory services with BW factories. - BWB has also taken significant strides towards promoting

¹⁵ http://www.ilo.org/dhaka/Whatwedo/Publications/WCMS_754669/lang--en/index.htm

Dimension and indicators	Achievement Levels*	Findings & Explanations
		<p>career progression opportunities for female workers through GEAR (Gender Equality and Returns) project, rolled out in 2016 in partnership with IFC, it was scaled up, and a total of 588 female sewing operators were trained, and 368 promoted in the supervisory positions to improve their skill. GEAR has covered 80 supplier factories from six major international brands</p> <ul style="list-style-type: none"> - Mothers@Work – a UNICEF and BWB partnership helped protect the well-being of mothers and ensure that their children receive the early nutrition they deserve. In addition to the 80 BWB partner factories, the M@W program was scaled up to additional 25 factories at the end of 2020.

*As per UN Country Team -SWAP methodology scorecard, achievements are assessment in terms of three levels – Level 1: Approaching minimum requirements, Level 2: Meets minimum requirements, Level 3: Exceeds minimum requirements

3.6 Programme impact

Sectoral and regulatory impact (EQ 22, 24 and 26)

The RMG sector have indeed become more compliant, competitive, and forward-looking through the regulatory changes supported by the programme: Bangladesh' RMG sector has made a sizable progress in the last 10 years (and specifically during RMGP II from 2017) in terms of improved regulation and labour inspection reforms. The establishment of the NTPA on Fire Safety and Structural Integrity in the Garment Sector of Bangladesh, guiding legislation and policy, and administrative measures not only facilitated the launch of the three initiatives—ISU, RSC, and Nirapon—but also directed their inspection and safety support measures. The NTPA and the support of RMGP II in developing a common framework document, the NTPA Guidance Manual contributed to a fundamental transformation in the safety culture of the RMG industry. Other changes witnessed are related to, a) remediation framework and structure for NI factories, b) labour inspection reforms and enhancement of the DIFE's capacity, c) strengthened regulatory environments governing OSH, d) revisionary reforms in the legal framework of Bangladesh (BLA 2006 amended in 2013, 2018; BLR 2015 proposed to be amended in 2022; EPZ labour act passed in 2019). Many regulatory changes happened in the area of governing OSH, such as national plan of actions (NPA) on OSH (2021-30), national OSH profile, national OSH day (28 April), widespread OSH awareness, OSS, and LIMA. Regular factory inspections to identify and address safety hazards and risks, sustained remediation efforts in all RMG factories, the establishment of safety committees in factories, and increased awareness of safety and health concerns have contributed to the compliant culture at the enterprise level. These regulatory reforms are for the long-term and likely to support the RMG industry to remain more compliant, competitive and forward looking in the future (Beyond RMGP II).

The concrete improvements in the RMG sector are a contributor to the growth and economic contribution of the sector to the country's export earnings: Bangladesh is the second largest apparel exporter in the world. In 2021, Bangladesh's apparel export earnings grew 30.36 percent to \$35.81 billion. The country's earnings from apparel exports surpassed Vietnam's export earnings of \$32.75 billion¹⁶. In FY21, around 70 percent of the country's total export earnings came from three markers, such as the European Union (EU), the United States (US), and UK. Facilitated by the duty-free and quota-free access, the EU became the largest destination of Bangladeshi exports, mainly RMG, accounting for around 45 percent (excluding UK) of total export in the past few years¹⁷. Export values of RMG sector have been

¹⁶ [BANGLADESH REGAINS GLOBAL POSITION AS THE SECOND LARGEST RMG EXPORTER - RMG Bangladesh \(rmgbd.net\)](https://www.rmgbd.net/), quoting the General Statistical Office in Bangladesh

¹⁷ [Export Performance of Bangladesh. A Quick Assessment \(bb.org.bd\)](https://www.bb.org.bd/)

steadily increasing from 19.1 billion USD (2012)¹⁸ to 35.8 billion USD (2021). The RMG sector contributes to 81.2% of the country's total export incomes¹⁹. While Bangladesh has several competitive advantages in the RMG sector in terms of prices, on-time delivery, quality, and product advantage, Shwazan and Das (2022) acknowledge that factor conditions such as safety and social compliances initiated by safety and social compliance initiatives are also a contributor to the growth of the sector and its economic contribution to the national economy.²⁰

Safety, social (and environmental) compliances will acquire increasing importance and leverage in negotiating country's transition from LDC to a developing country: The graduation from LDC to a developing country status expected in 2026 would mean anticipated loss of preferential market access availed by Bangladesh's exports of apparels (preferential access is to end in 2029 in the EU market). In moving from Everything but Arms (EBA) duty free and quota free access to EU's Generalised System of Preferences (GSP) would require demonstration of compliances related to 27 international conventions pertaining to labour and human rights, environmental and climate protection, and good governance. This means that safety and social compliances (including environmental compliances in the future) would become increasingly important for the country in negotiations with the EU and other markets for preferential access. The achievements of the RMGP II have put the country on a strong pedestal on this front.

Impact on enterprises, social partners, and workers (EQ 23 and 25)

The remediation requirements and protocols were compelling for the factories, thereby improving compliance and safety: The remediation requirements (and the protocol followed by DIFE in conjunction with BGMEA and BKMEA) compelled /motivated the factories to comply as without which will lose Utilisation certificate or license to operate (1000+ factories have closed down or shifted). This amplified the need to focus on safety by the enterprises, especially who are linked to the global supply chain. Factory owners have invested in safety infrastructure. The new entrants in the RMG global supply chain too are compelled to make investment in building, fire, and electric safety first, and then continue investing in safety system. The programme supported remediation processes have clearly provided the impetus for long-term improvements in industrial safety.

Evidence from several studies shows that the programme contributed to acceleration of progress on SDGs in the RMG sector, however this progress would need to be scaled up as it is currently seen in a section of factories and workers: Several instances of impact are cited by outcome and legacy studies, independently conducted by the CPD. These are useful indications that programme have indeed contributed to acceleration of progress on SDGs in the RMG sector, which have a consequence for the national level picture as RMG sector employs large number of workers - 4.2 million (2.5 million women)²¹. However, it is also acknowledged by these studies that the impact is not even across i.e., the impact is experienced by a limited proportion of factories and by workers. Further the progress is more pronounced on SDG 8.5 (full and productive employment and decent work for all, and equal pay for work of equal value), SDG 8.8 (labour rights and secure working environments for all), SDG 16.6 (effective accountable and transparent institutions) and SDG 9 (Industrial infrastructure and innovation) and less so on SDG 1 (no poverty), and SDG 5 (gender equality). The proportion of change on SDGs is relatively higher in BW-supported factories (and workers) than NI factories (and workers). A synopsis of this impact²² is presented below:

¹⁸ [Bangladesh: export value of ready-made garments 2021 | Statista](#)

¹⁹ [Bangladesh's Robust RMG Export Performance: The Underlying Drivers | CPD](#)

²⁰ Ishtehar Sharif Swazan & Debanjan Das, 2022. " Bangladesh's Emergence as a Ready-Made Garment Export Leader: An Examination of the Competitive Advantages of the Garment Industry," International Journal of Global Business and Competitiveness, Springer, vol. 17 (2), pages 162-174, December.

²¹ [Ready-Made Garment Sector Digital Market Assessment: Bangladesh - UN Capital Development Fund \(UNCDF\)](#)

²² Outcome Study (2022) and Legacy Study (2023) and other programme documents and literature cited

- A survey revealed that 50 per cent of surveyed NI factories management are aware of the SDGs 8.8.1 definition of fatal and non-fatal injuries. Further 89 per cent of workers of surveyed NI factories, compared to five years back, presently feel safer working in their factories (SDG 8.8). At the same time, 97 per cent of the surveyed workers from NI factories said they have seen their factories undertaking activities to improve workplace safety. Considering their previous minimal level of workplace safety standards, a section of interviewed stakeholders sees this rise in awareness and development of safety culture among NI factories as a key achievement under Outcome 1 of RMGP (Phase II)
- As NI factories used to be most vulnerable to industrial accidents due to their minimal compliance, the risk reduction rate is higher for remediation progress in NI factories compared to other initiatives factories. Hence, the remediation progress in NI factories has substantially contributed to reducing the risk of industrial accidents occurring. No significant industrial accident case has occurred in these NI factories in the last five years, unlike in the past. A survey found that compared to the year 2018, the ratio of injuries against the number of accidents in surveyed NI factories decreased by almost 10 per cent in 2021.
- The improvement in workplace safety is expected to play a role in increasing the productivity of the workers. Workers, particularly from these NI factories, are now more aware of how to prevent industrial accidents and what to do if one such accident occurs in their factory. This has resulted in an increase in their confidence regarding their workplace safety. According to the conducted survey, in 2017, 53% of workers in NI factories used to feel assured about their workplace safety. However, for the year, 2021, this confidence has increased to 60 per cent. This increase in confidence should partly contribute to an increase in their workability, which can be considered another achievement. Evidence from BW factories indicate that technical know-how on improving working conditions is contributing to improved productivity.
- A survey conducted on NI factories by Moazzem et al. (2022) found a significant improvement in the different business indicators of NI factories in post remediation phase (in 2021) as compared to pre remediation phase (in 2018).²³ For example, the average no of products produced/exported to (per surveyed NI factory) has increased to 2.07 from 1.13; the average no of countries exported to (per survey NI factory) has increased to 7.53 from 6.73; the average no of brands work with (per surveyed NI factory) has increased to 8.80 from 8.33; average per month production capacity (per surveyed NI factory) increased to 1.0 million from 0.8 million.
- Two research reports (quoted by Legacy study) on BW's impact one titled 'Understanding-impact-Research-insights-from-Better-Work-2017-2022' and another titled 'Is BW better?: Empirical Patterns from the Garment Sector in Bangladesh' found that workers of BWB member factories earned an hourly wage up to 3-4 per cent higher relative to comparable workers in other non-BWB member factories (while demographic, work and firm characteristics effects are controlled). It was also found that Better Work Bangladesh factories are performing better in terms of providing maternity leave to workers than their peers in this area. In addition, it was found that after subscribing to Better Work, factories in Bangladesh grow (both in terms of export revenues and volumes) at a significantly higher pace than the factories outside the programme. On average, in the period following enrolment, factories' export revenues and volumes are 50 per cent higher than non-Better Work firms.
- About 100 factories (of 441 BW supported factories) have active trade unions and rest have participation committees. Trade unions provide better collective bargaining agreements between employers and workers. In key informant interviews, BW team observed that trade unions in BW factories is an emerging success story as unions are effective in educating workers about their rights, roles and responsibilities and are able to make their work more comfortable in the factories. Before trade union, BW team observes, there was no culture of compliance. But after trade union, scenario of these factories is

²³ Moazzem et al. (2022)

totally changed. The cases of harassment of workers have considerably reduced, and benefits and facilities available to the workers have increased. Though employer have still not changed their attitude towards trade unions in terms of positive role they can play but with time, this is expected to happen as well.

- Since the programme's inception and until March 2023, BWB facilitated the formation of 321 PCs and 284 SCs, where 646,247 workers (56 percent women) elected 3,504 PC representatives (47 percent women). These committees have a positive impact on enhancing workers-management dialogue factories²⁴.

Despite these achievements, the sector has still to make considerable progress towards accident-free and decent work status especially among small and medium factories: A CPD analysis²⁵ on rate of accidents in post Accord-Alliance period portray a still concerning picture. The CPD made a comparison in industrial accidents during the post-Accord-Alliance period (2018-21) vis-à-vis the Accord-Alliance period (2015-2018). No major difference was observed in total number of incidences between the two periods. Majority of incidence in Accord-Alliance period was related to fire. The incidences are getting diversified from fire to electrical and structural in post-Accord-Alliance period. Also, new types of incidences are also observed: boiler and explosion of gas cylinder. Incidences are particularly evident in medium size factories in the post Accord-Alliance period. Majority of factories were under the inspection of Accord/Alliance. These accidents occurred despite existence of safety committees meaning a part of responsibility can be assigned to these committees. The CPD goes on to say that while large factories are generally safe and progressing over time, Small and Medium Enterprise (SME) industries are left behind due to financial constraints. Safety culture in factories has not been established yet: Majority of SME factories are yet to develop a safety culture. There is little initiative to ensure employee participation to create a safe environment, reducing employee level of risk, and undertaking proper emergency responses. Gap exists in safety leadership roles through senior, mid, and junior level management professionals. Different workers organisations, particularly safety committees are not functioning adequately in this context. Employees do not have adequate information regarding the functional groups of safety programmes. On the contrary, numerous labour unions are documented, but their functional quality is questionable. In a visited (tier 2) NI factory by the evaluation team, it is observed that while safety committees, participation committees, and anti-harassment committees exist, the members are less aware of their roles, and it is not clear what deliberations have happened recently in these committees. It may be that these committees exist but are less functional and /or effective. Staff are not aware about DIFE help line.

While the RMG sector have become safe overall especially in medium and large factories, social compliances are still limited to large BW factories: The RMG sector overall has become safe during the past ten years. The safety policy environment in the sector too can be attributed by the initiatives by and created through RMGP II and BWB programme intervention. The establishment of the National Tripartite Plan of Action on Fire Safety and Structural Integrity in the Garment Sector of Bangladesh (NTPA), guiding legislation and policy, and administrative measures not only facilitated launch of the three initiatives—ISU, RSC, and Nirapon, but also guided their inspection and safety support measures. A fundamental shift in the RMG industry's safety culture too can be attributed to the NTPA. While the compliance to international labour standards in relation to OSH is somewhat visible, but very few factories focus has moved to social compliance issues. Environmental compliances are visible only in very large factories. It is acknowledged that majority of medium and large RMG factories are compliant in terms of physical safety issues. Some of these factories (e.g., under BWB) have embarked on programmes that cover issues beyond physical safety to a

²⁴ QPR Jan-Mar 2023 report, p 12

²⁵ <https://cpd.org.bd/wp-content/uploads/2021/07/Presentation-on-Challenges-of-Industrial-Safety-in-the-Post-Accord-Alliance-Era.pdf>

broader set of social compliance issues (representations in safety and participation committees, collective bargaining; benefits such as maternity, leave, decent wages; voice in terms of complaint and grievance addressing mechanisms; insurances such as medical, employment injury and better compensation packages for workers /their families who suffer injury /deaths due to workplace accidents.

3.7 Sustainability

Sustainability mechanisms (EQ 28, 29, 31 and 33)

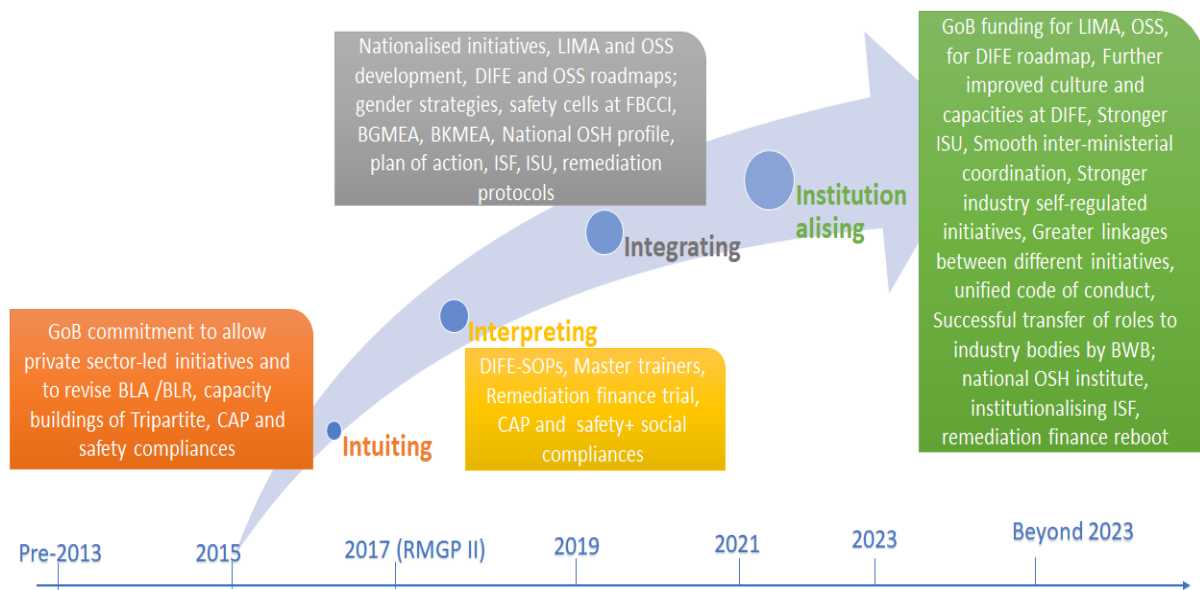
Sustainability mechanism is about institutionalisation which is the process of incorporating programme interventions into existing systems and procedures. This includes integrating industrial safety measures, compliance mechanisms, and labour governance practices into regular factory operations, reporting systems, and standard operating procedures. They are more likely to continue implementing and supporting these practices if various stakeholders, including government agencies and business associations, are synergistically engaged and recognize the benefits of enhanced labour governance and compliance.

The results of the programme are likely (medium-to-high confidence) to be sustained as institutionalisation processes are progressing well: The long-term viability and continuity of the programme results depends on the sustained motivation of all stakeholders. If all tri-partite collaborate, the results of the programme can be maintained and even enhanced. The interventions that are likely to be sustained beyond RMGP II include continued remediation actions, implying a continued decrease in the number of factories with severe safety risks and hazards. A higher level of compliance (on safety and social compliance related labour standards) can be expected at least from medium and large factories. As the government continues to demonstrate commitment to industrial safety, compliance with labour standards, and labour governance, there is a greater probability that the programme's results will be sustained. However, sustainability is not guaranteed automatically as it will require effective implementation of national policies, regulations, and frameworks by the GoB as well as by other ongoing initiatives. Since sustainability of RMGP II results are closely associated with 'institutionalisation', the evaluation has analysed sustainability through 'institutionalisation' lens. To this end, we have used a '4-I' framework of institutionalisation ('Intuiting', 'Interpreting', 'Integrating', and 'Institutionalising'), developed by Crossan, Lane, and White (1999). This framework was also used by the CPD (2021).²⁶ We have adapted and updated the framework to evaluate sustainability of RMGP II. Post Rana Plaza (2013), the 'Intuiting' phase of institutionalisation started with GoB demonstrating its commitment by allowing private sector led initiatives (Accord and Alliance) to take root and by revising BLA (2006, revised 2013) and BLR (2015). The RMGP I organised several levels of capacity building for the tripartite constituents. A process of Corrective Action Planning (CAP) and safety compliances started to happen in this phase (RMGP I) for the brand /buyer-linked factories. In RMGP II, 'Interpreting' step of institutionalisation started with further rounds of improvements in regulation (DIFE SOPs), further rounds of capacity building on labour inspections, and further improvements in remediation protocol. Realising a challenge of capital for funding remediation especially by the NI factories, a new product of remediation finance was also tried out in this phase. RMGP II also involved progress to third 'Integrating' step of institutionalisation, under which Accord and Alliance were transitioned into nationally registered initiatives called RSC and Nirapon respectively. Smart Governance /technological interventions (LIMA, OSS) were developed with considerable potential to improve industrial safety. DIFE and OSS roadmaps were prepared. DIFE and BFSCD was supported with their gender mainstreaming strategies. These are some of the changes in the practices of national partners (DIFE, BFSCD, RSC,

²⁶ Crossan, M., Lane, H. and White, R. (1999) An Organizational Learning Framework: From Intuition to Institution. *Academy of Management Review*, 24, 522-538.

Nirapon etc.). Safety cells were established across FBCCI and other industry bodies /membership organisations. National OSH profile and a plan of action was developed. New institutional structures called Industrial Safety Unit – ISU (within DIFE) were formed which are expected to take on the role of the temporary structure of RCC established in the first phase of RMGP. Remediation protocols and ISU-RSC were developed to ensure effective implementation of remediation activities related to safety and social compliances. The programme developed initial thinking on how an Industrial Safety Framework (ISF) would look like. RMGP II clearly was legacy building phase as significant institutionalization (third step of 'Integration') occurred during this phase. As a consequence of the remediation efforts of NI factories under RMGP II, the number of factories with serious safety risks and hazards has decreased significantly. The BWB's legacy of compliance has helped factory owners and managers recognize the importance of labour standards. BWB's new factory engagement framework mechanism sees transfer of tools and capacities to national constituents so that they can take over delivery of services from the programme in a sustainable manner. The interventions in labour governance have strengthened the government's ability to enforce labour laws and regulations. Next and the final step of 'Institutionalising' is not fully achieved yet by June 2023 (end of RMGP II). Several ongoing processes (see figure 5) would need to be completed to ensure that this institutionalisation happens in reality, which is the task for the next phase of the RMGP to oversee and support.

Figure 6. Status of institutionalisation of labour inspection reforms and industrial safety in Bangladesh

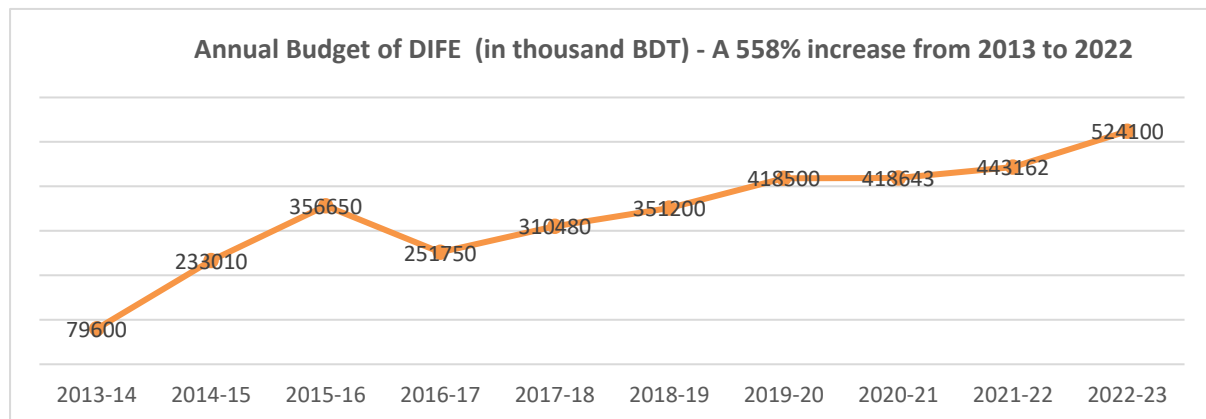


Adapted by the evaluation team from Crossan, Lane and White (1999) as cited by Moazzem and Khandker, CPD (2021)

The RMG sector have made significant strides in terms of SOPs, code of conduct, manuals, tools, and capacities and so the sector is well-placed to achieve Step-4 of '4-I' institutionalisation framework. To go there, a few milestones would need to be crossed, such as a) a stronger institutional structure of ISU is needed, b) greater institutional coordination and sharing (e.g., LIMA and OSS become guiding force) is needed, c) greater involvement of private sector partners in tracking and enforcements (in PPP mode) by the governmental authorities, d) greater linkages between different initiatives, e) successful transfer of roles to industry bodies by BWB, f) institutionalising ISF, g) remediation finance redesign and pilot /scale up, and finally enhanced sector-wise awareness and knowledge sharing. Further, the safety and social compliance initiatives (RSC, Nirapon, BIDA-FBCCI) would need to be integrated under one umbrella. DIFE is considered to be the most-appropriate structure for providing this integrating platform. More interactions and knowledge sharing are needed

among different initiatives and actors within RMG sector for improving safety culture across the board.

Figure 7. Trend of annual budget of DIFE in the last 10 years



Source: DIFE annual reports

Sustainability momentum (EQ 30 and 32)

While a sustainability momentum is already witnessed, but there is still a ‘way to go’ to achieve scaling up within and replication beyond the RMG sector: The programme has succeeded in enabling a culture of safety priority in the Bangladeshi RMG factories. However, there is still a way to go in terms of scaling up within and replication beyond the RMG sector. The evaluation team conducted a detailed assessment of achievement on the National Action Plan of Labour Sector of Bangladesh (2021-26), the government delineated actions by DIFE and government agencies. This is a collection of a series of legal and administrative reforms required to uphold labour rights and workplace safety in Bangladesh. It details out what more needs to be done to achieve sustainable impact in the RMG sector and beyond:

Institutional strengthening in terms of number of posts is still a work-in-process: To ensure full functionality of the labour inspectorate, the plan was to expand inspector resource base to 575 posts recruiting 255 new labour inspectors, and by December 2023 establish 942 new posts of inspectors and fill the posts. Human resources at DIFE have during the programme period substantially increased, and more inspectors are being recruited. However, the recruitment pace still lacks in view of the needs identified and planned for in the NPA. As of now, the total number of inspectors working in DIFE is 401, out of which 305 are the field level labour inspectors, 49 Assistant Inspector Generals, 40 Deputy Inspector generals, 5 Joint Inspector Generals, 1 Additional Inspector General, and 1 Inspector General. The rest of the vacant posts (174) are yet to be recruited directly or filled up by promotion. The government has approved 136 new posts of inspectors against the MOLE proposal for 942 posts of inspectors, and also sanctioned creation of 13 new posts of inspectors for NOHSTRI, which needs to be filled up on an urgent basis. Also, the planned expansion of legal officers - from current one officer to nine legal officers - has not taken place. Year wise inspection data of DIFE shows that in RMG sector DIFE has carried out a total of 547 inspections in 2022, out of which 434 were proactive inspections, 51 were reactive inspection, and 2 were follow-up inspections. Yet, current manpower in DIFE focusing for all sectors of the country is limited. As the DIFE is responsible for inspecting all shops, establishments, and factories in the country (44868 registered establishments), it is unlikely that the institution will be able to inspect all of them. The human resources and capacity of the newly formed safety unit must be expanded in order to conduct proactive inspections in the sector.

DIFE is yet to have a systematic capacity development plan for developing competencies of labour inspection staff: Another of the NPA action for DIFE is developing competencies of Labour inspections staff, for which two actions were planned—first by creating senior posts for inspectors (4 Additional IG, 12 JIG and 51 DIG) and regular promotion of LIs to AIG, AIG to DIG, DIG to JIG and Additional IG, and second by providing regular trainings and capacity building measures. In terms of promotion during the programme period, 53 inspectors are either promoted or in the process of being promoted. 8 staffs were promoted to LI, 8 DIGs are in place and 5 JIG are currently in charge and their promotions are in the process in MoLE. Also 32 DIGs are awaiting promotion, and it is in the process too in the MoLE. The trainings and capacity building measures are ongoing, as the timeframe of NAP is continued till 2026, where each of the labour inspector is expected to receive a minimum of 50 man-hour training annually. The training records of DIFE shows that 359 inspectors received the foundation training on Basic OSH and labour inspection, and 96 inspectors received some form of higher-level trainings (master's in OSH, risk and safety management, and social protection, and diploma in OSH or safety). The programme document and the KII interviews with DIFE staff point to 24 DIFE engineers receiving special training on effective inspection on fire, electrical and structural safety, and have become the master trainers to share learning to inspectors. In addition, DIFE provided in-house training to inspectors (34 training courses in 2021-22 in which 958 persons participated, and in 2022-23, trainings were given to 930 participants). However, these in-house trainings were for a short duration (6 hours to 2 days) and the issues of trainings were varied including employment contract, citizen charter, 4IR, Information rights, case filing, GRS, e-governance, APAMS software, audit software, public procurement, national wage policy, BLA and BLR. In terms of trainings and capacity building measures, DIFE is yet to have a systematic training plan and action to ensure all inspectors receive regular training on issues of safety, social and environmental compliances, on which future intervention need to focus on.

Full application of LIMA is expected to happen in near future: In order to ensure functionality of labour inspectorate, according to NPA, another action planned by DIFE is the full application of LIMA in all DIFE offices. All 23 DIFE offices are using the LIMA for inspection monitoring, and the inspections are being carried out through LIMA.

Workers compliant management system of DIFE need to become more effective: The NPA obliges DIFE to set up an efficient system to follow-up on workers' complaints received through the helpline. A complaint management cell has been established at DIFE consisting of eight labour inspectors. One action under the NPA is the creation of a database of the complaints including the information on the number and nature of complaints and the nature of follow-up complaints. The DIFE records on grievance handling do not show distinguished criteria of follow-up complaints, but a database is created. The nature of complaints in 2021-22 show that 78% of the complaints to DIFE were related to legal payment salary and other payments, overtime, and service benefits; 15% complaints were related to dismissal, lay-off, and termination benefits related, and rest were related to maternity benefits, leave and compensation claims. However, the number of complaints received shows that the helpline established in January 2019 is yet to be a commonly taken option for stakeholders to make complaints. The manual complaint mechanism is still in use at large, and the online system together (helpline, LIMA, and through email) accounts for only less than one-fourth of the complaints. In 2020-21 online complaints were 25% of the total complaints (1309 complaints out of total 5236 complaints) received in the year. The following year the percentage of online complaints reduced to 17% (612 complaints out of total 3604), and the online system was used by 22% stakeholders (826 complaints out of total 3604), in the current fiscal year (till April 2023). In view of this, future intervention needs to focus not only making stakeholders aware on the online system of complaints including the helpline but also need to address inadequate supports DIFE has in terms both human resources and logistics, and training to monitor the complaints received and addressed and update the number of complaints

received and resolved.

Cooperation arrangements between DIFE and other initiatives (RSC, Nirapon) need refinements: The status of DIFE's coordination and monitoring framework for RSC is one action point of DIFE under NPA. Till date, two bilateral meetings between DIFE and RSC, nomination of DIFE focal point for coordination with RSC, formation of joint working group of DIFE and RSC and DIFE review panel led to cooperation with the RSC. But no such efforts are visible for overseeing Nirapon linked factories' remediation and compliance progress. A joint monitoring and assessment framework for factories under the RSC, Nirapon, and DIFE that addresses all issues related to remediation, inspection, and social conformance will help reduce duplication of efforts and resources. The collaborative framework would enable all three initiatives to identify areas in which they can collaborate more closely, including information sharing reducing the need to gather factory data, training, and capacity-building activities.

The issue of cooperation arrangement of DIFE with other initiatives (RSC and Nirapon) brings to the fore the issue of differential standards being pursued by different initiatives. This issue becomes more pertinent as LIMA inspection module and checklists aim at some standardisation on compliance checklists. DIFE cooperation modalities with RSC is defined in terms of ISU-RSC framework, which entails reporting requirements of RSC to DIFE. However, this arrangement is yet to be effectively operationalised. Also, there is no cooperation arrangement defined of DIFE and Nirapon.

BIDA-Industry partnership shows the way for reforms to be scaled up and replicated beyond the RMG sector. On the directive of the Prime Minister's Office (PMO), the Federation of Bangladesh Chambers of Commerce and Industry (FBCCI), apex industry organisations working in all sectors, along with BIDA has carried out a joint survey (~February 2023) cum inspections of 5206 non-RMG factories. For doing this, 108 small teams were formed (drawn from different departments and authorities) and started inspections (with three days prior information of inspection visit provided to factories). An inspection list was provided in advance to the factories being inspected. The assessment was completed very rapidly, and the data collected has considerable potential in terms of risk-profiling of sectors and geographical areas. This data is being analysed for which FBCCI is expected to seek support from the ILO. This data can potentially guide next stage of safety interventions in high-risk sector /geographies. Based on the assessment, three levels of actions have been proposed with a directive from BIDA /DIFE. The factories have been given 3-months/6-months/12-months' time for undertaking corrective actions depending on the issues identified and the marks obtained during inspection (25% marks given 3-months' time and so on). If this initiative succeeds in ensuring remedial actions, then it can be a model of a self-regulated initiative catalysing large-scale reforms in the industry within a short span of time. This is an excellent joint initiative of the Government with the industry organisation, where for the first time, factory owners were included in the inspection team. The programme contribution /attribution to this initiative can be seen in terms of support provided to the FBCCI safety council through a TOT on fire safety rescue, safety committee. FBCCI safety cell has then supported 60 factories, employed TOT instructors, and supervised them. FBCCI has established 4 safety cells and 12 sectoral cells in four chambers across 6 divisions in the country.

3.8 Effectiveness of governance and management arrangement

Governance, and staffing structure (EQ 18 and 19)

Operating with a dedicated teams for RMGP II and BW, composition of staffing was appropriate for the skillsets required, except that some BW advisors perceived a workload: The programme has a dedicated team for RMGP II (first four outcomes) and for

the BW work (fifth outcome). The discussions with the ILO country team confirms that the team structure, skill set, and adequacy of staffing was appropriate. Early in the second phase, there were some international staff members but over time, some of these were replaced with nationals. While reducing staff costs, this approach worked in terms of creating in-country capacities. There was just once exception. The role of advisor in BW has come in for a scrutiny as each advisor is allocated about 18 factories. Each advisor is responsible for conducting assessment, identify root causes, facilitate corrective action planning /road map, and support the factories for any troubleshooting required. The work of advisor is geographically distributed and require movements for 10-12 days in a month to provide hands on advisory services. An advisor conducts two assessment per month and prepare assessment reports that can be shared with the buyers. An overall progress report is also prepared every year for each factory. The workload of an advisor is considered unsustainable by the BW team. BW have 29 advisors and is now recruiting consultants to do the assessment to ease the workload of advisors and some work allocations especially related to assessment can be taken on by the consultants.

Programme governance arrangement was adequate though workers organisations felt their limited participation: The programme followed the tripartite mandate since the very beginning when post Rana Plaza, a NTPA on Fire Safety and Structural Integrity in the RMG Sector was adopted. Most of the programme actions involved different and complementary roles of the tripartite. The programme formed a tripartite Project Steering Committee (PSC) to provide governance strategic oversight to the implementation of RMGP II. This was a good structure as most of the engaged Ministries of the GoB were involved, along with other constituents of the tripartite. Praising the tripartite involvement and the governance structure, one of the CPD report recommended that a similar kind of governance structure can be formed to execute industrial safety in the non-RMG sector. However, some other key informants argued that the representation of the workers /workers organisations in the PSC was considerably lower in the second phase of the programme. Consultations on this issue with the programme team confirms that this limitation was mainly due to the fact RMGP II was focussing on the regulation and policy level and was engaged in strengthening the Government capacity. Nonetheless, this limitation is notable as more engaged workers organisations are important for the ILO's tripartite mandate, irrespective of the focus of programme interventions.

Skills and partnerships, including gender expertise (EQ 17)

As demonstrated earlier, programme had all the partnerships (at macro, meso and micro levels) needed for effective implementation and benefited from high level of gender expertise: Effective collaboration and partnerships are assessed in detail in section 3.4. The assessment clearly indicate that the programme had adequate tripartite partnerships to implement the programme effectively. The management team had adequate gender expertise, as is demonstrated by the assessment that the programme achieved gender integration across all its main interventions. The programme team had a matrix structure with a gender focal point leading the gender portfolio of work across all strategic areas.

Systems for assessing performance and impact, risk management (EQ 18)

M&E system in the programme captured progress well through internal mechanisms and independent studies: The programme had a well-functioning M&E system that monitored output and outcome indicators of programme Logframe /Results Framework. The M&E system collected sex-disaggregated data (to the extent possible) and captured and reported on gender-related results. The strength of the programme M&E system lies in the fact that a clear picture of progress is available on most of the output and outcome indicators. The M&E system did well in commissioning verification of remediation data on NI factories as this verification resulted in corrections in the data. The M&E system also involved conducting independent baseline (2018) and outcome studies (2022) to track the progression on results being achieved. However, this comparison could not be made as baseline study design

focussed on understanding the working conditions and wellbeing of the workers in the RMG sector while the outcome study design focussed on the logframe indicators. This dissonance made the M&E system less robust. Even though designs of baseline and outcome studies were different, it is acknowledged that the outcome study provided some reflection on worker level impact of the programme. Also, The BWB M&E system generated data related to both the logframe indicators as well as on the working condition and well-being of workers through regular monitoring, as well as special evaluations on initiatives such as GEAR and M@W. Therefore, combining all the M&E documents (baseline study, outcome study, legacy study, BW monitoring data) provide a reasonable picture of programme progress and achievements on results. But it must be noticed that BW worked with a different set of factories than the DIFE component of the programme. As the programme was conducting a range of training and capacity building for different constituency partners, however M&E system could not capture, or document data related to training outcomes (beyond participant satisfaction surveys). Similarly, though BGMEA, BKMEA, RMGPIL supported a range of capacity building interventions on OSH, safety committee, participation committee for 400+ factories. However, performance and impact of these trainings were not assessed, and no data is evidently available in terms of adoption of OSH, functionality of safety committee and participation committees.

Given the intense nature of BW advisory to the factories, it could marshal better M&E data: The M&E system at BW has generated several layers of useful data for understanding progress and results and for better planning and implementation. BW operate in 10 focal areas and themes and regular data is generated on these through designated forms. This data feeds into the results matrix. BW also conducts research related to factory satisfaction, productivity and profitability assessment, impact on business and workers etc. BW maintains an integrated cloud-based system called STAR. The system is accessible to the BW global team and is used to generate data on globally harmonized indicators. This helps in not only to monitor the programme progress but also in differential donor level reporting at country and global levels.

Adaptiveness in execution, including response to Covid-19 disruptions (EQ 20 and 21)

The programme demonstrated a very high level of adaptiveness in the course of implementation: The programme management has been adaptive to changes in the institutional framework of remediation, inspection, and policy development. Remediation framework evolved with the changing context. The mandate to continue factory inspections, remediation monitoring, and workplace programmes of Accord was inherited by the RSC. Work of Alliance was followed by Nirapon in especially the CAP closed factories. The remediation responsibilities of the NI factories were entrusted to DIFE, and during the programme period a temporary institution—RCC was created and finally to a full -fledged unit—ISU of DIFE was developed. The institutional changes required programme management to work with these initial institutions and the transitioned these to new structures to remain relevant in the future. Another adaptive management feature of the programme is evidenced in its support in creating digitalized OSS for industrial safety. The programme collaborated with BIDA's to leverage OSS for licensing processes of several departments. The integration of OSS with BFSCD (e-fire licensing) is complete, and the with DIFE (LIMA) is in the process. The exploration of the interlinkages between existing licensing services provisions together with labour inspection (LIMA) and initiating the digitalized OSS has enhanced opportunities to achieve intended programme outcome. The third concrete example of adaptive management is inclusion of youth in the OSH awareness campaigns. Youth were not part of its programming, but it was realised that for a sustained awareness on OSH across the country, the inclusion of youth is a necessity. To that end, the programme established an agreement with VSO Bangladesh and engaged 1500+ youth through 8 divisional youth summits for promoting OSH awareness across the country.

Better Work Bangladesh kept engaging factories through its core services during the Covid-19 pandemic, with the adoption of hybrid modality in the forms of online trainings and

assessments. Master Trainers trained by BWB provided TOT on topics including Covid-19 General Awareness and Supporting OSH and Infectious Disease Preparedness and Response to COVID-19. BWB developed COVID-19 Management guidance for factories (that covered issues including retrenchment) and COVID-19 awareness-raising training for workers, in order to ensure adherence with safety and health requirements. Also, BWB convened brand partners as signatories to the global Call to Action, which was aimed at mitigating risks for RMG factories in the face of declining RMG orders internationally.

The GoB commitment and several other factors enabled RMGP II to deliver its mandate. The programme, overall, showed adaptiveness to changing context, while some constraining factors remained outside the programme’s sphere of influence: A key factor facilitating the achievement of the results, outcomes, and objectives of the RMGP-II is the government’s interest and willingness to change the safety culture and system so that the horrific fire and building collapse tragedies never occur again and Bangladesh continues to perform with its strengths in the global supply chain. The crisis prompted the government to adopt a comprehensive strategy to ensure safe working conditions. Government sought support for a significant dive into enhancing workplace safety in RMG industries, with Accord and Alliance sharing the remediation tasks with the DIFE. RMGP II has intervened in the sector to ensure that all factories participating in the National Initiative have either successfully undergone remediation or ceased operations. Government (PMO) interests also prompted the commitment, collaboration, and active participation of government agencies in regulating industrial safety and establishing an effective labour inspection system. The second factor contributing to the success of the RMGP II was the initiatives led by supply chain /private sector brands and buyer. Accord and Alliance (in the first phase) and subsequently RSC and Nirapon (in the second phase) were the flagbearers of safety movement in the RMG sector. By facilitating the establishment of the National Tripartite Plan of Action (NTPA) on Fire Safety and Structural Integrity in the Garment Sector of Bangladesh guiding legislation and policy, administrative and practical activities, and timeframe for implementation was also a significant contributory factor. In accordance with the NTPA, a Guidance Manual, for assessing remediation for all three initiatives was developed. The remediation progress against the initial CAP has contributed to a fundamental shift in the RMG industry’s safety culture. Adaptive management and execution by the ILO team played a significant role as new strategies (LIMA, OSS, DIFE road maps, OSH day), processes (ISF) and structures (RCC and then ISU) were developed to respond to continuously changing context.

Figure 8 Factorial analysis of RMGP II



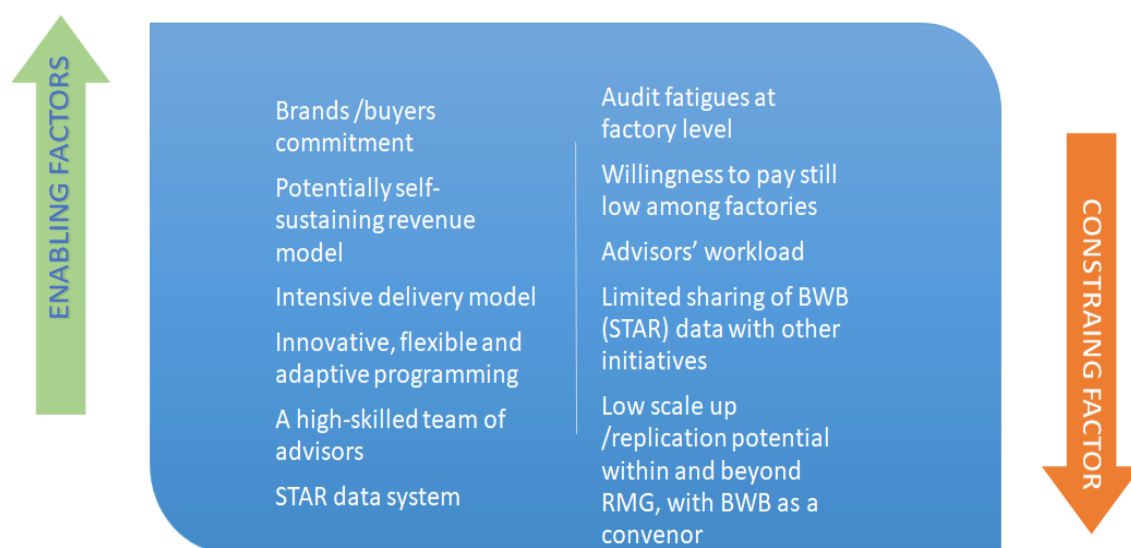
The programme also saw several constraining factors as captured in the figure 4 below. Some of these constraining factors were clearly external to the programme, outside its sphere of influence e.g., most of the NI factories were small factories, operating within shared building /rented floors, and so have no control over full building. Capital investments in this scenario was one of the challenges some of the factories faced. A first ISF meeting report (May 2022) highlight that factories have insufficient funds for relocation as many accidents take place in the densely populated area. There is a GoB initiative for relocating plastic factories, however, the redeployment costs are expensive to many owners. Remediation finance did not succeed due to inadequate design and ineffective implementation. Here other UN agencies (such as IFC) could have played a better role (than the ILO). The other factors outside the sphere of influence of the programme were related to the procedural bottlenecks (in recruitment of inspectors, in approval of roadmap /strategies by Government departments), capacities, culture and coordination challenges within Government departments. On other constraining factors, the programme could have done better in addressing them and showed more adaptiveness in execution e.g., the programme would have devised mandatory requirements of follow up of factory management, safety committees and participation committees who received capacity building support from BGMEA and BKMEA as that would have given better idea about how the behaviours and practices are changing post capacity building. Similarly, more regular verification of remediation data of NI factories was required to instil confidence in the reported remediation data. Furthermore, with regard to influencing power relations between men and women achieving gender equality requires long-term behaviour change as social norms and traditional attitudes have become deeply rooted in our society. Breaking resistance to change in established gender roles and expectations across the RMG sector would require programme to continue its tailored communication strategies, community dialogues, and engagement approaches that address concerns and highlight the benefits of change. It takes persistence and approaches that consider cultural sensitivities and offers alternatives to overcome resistance and confront these stereotypical societal norms.

BWB delivered a highly flexible, innovative, and adaptive programming, however further expansion (and possibly replication in other sectors), with BWB as a ‘convenor’, would require different structural modalities: The acceptance of BWB as a model of social compliance for the sector resulted from the brands /buyers’ commitment to the safety and social compliances in their supply chains. The BW is developed as a potentially self-sustaining revenue model, with contributions from both brands /buyers and factories. It is an intensive delivery model and have undertaken considerably innovative, flexible, and adaptive programming e.g., mothers@work, GEAR, and several other initiatives to improve workers wellbeing. BWB is implemented by a high-skilled team of advisors guiding the continuous improvement processes at their allocated factories (each advisor provide support to about 18 factories). Furthermore, STAR data system is the star of BW programming.

The factors which are not working for BWB is the ‘felt’ audit fatigue expressed by the factories receiving BWB support, which may also explain their still lower willingness to pay for the services received even though factory management and owners do realise the benefits of this support. Though, as BWB team clarified, some factories have also witnessed reduction in their audits as some buyers have subscribed to BWB assessment reports and are no longer conducting their own audits. The situation is variable across factories as some buyers are still conducting their own audits.

Advisors’ workload is high as they have to facilitate several assessments, follow on support and reporting for their allocated factories. While data systems at BWB are excellent, there has been limited sharing of this data with other ongoing initiatives. There is any way no common platform which can act as data repositories for all the initiatives to share their compliance related factory specific (without sharing buyers-related or other business-sensitive details) data.

Figure 9 Factorial analysis - BWB



Finally, given the intense model of compliance that BWB has developed and followed in a select group of factories (which are considered to be already 'better' factories by a constituency of key informants), it will be hard for the BWB to expand its model within the RMG sector and /or replicate this model beyond RMG, even in export oriented factories as a constellation of enabling factors (export-oriented nature of the RMG sector, buyers commitment to reforms in their supply chains, factories commitment to serve export markets and therefore comply with the safety and other Human Rights Due Diligence (HRDD) related compliances) would need to work for the BWB model to show similar level of success in other sectors of the Bangladesh economy. As per the long-term plan, the BWB will become the 'convenor' rather than providing direct advisory support to the factories and gradually hand-over the role of advisory support to BGMEA, BKMEA, BEF. This will require very different structural modalities for the BWB model to work and succeed.

3.9 Cross cutting issues

Gender (EQ 34, 35, 36)

RMGP has supported a number of initiatives intended to foster a culture of gender equality and achieved some success: A range of 'gender integration' initiatives across different institutions and levels have been undertaken. The programme has provided DIFE inspectors with capacity-building training on gender-related issues. DIFE has developed a gender road map that identifies key areas of work and proposes strategic directions for its work on gender mainstreaming. The programme has contributed to the addition of gender-based violations to the DIFE's inspection criteria. BWB has worked directly within the RMG industry to assure the presence of anti-harassment committees and women's representation on factory safety committees. Workers received training on gender issues and the safety and participation committee's function. Additionally, RMG management officials received training on supervisory skills, sexual harassment prevention, workplace cooperation, and participation committee duties and responsibilities. In order to lay the groundwork for ILO Convention C190's ratification, the programme emphasized raising industry stakeholders' awareness of the convention. BFSCD has introduced fire safety training for female firefighters, promoting gender equality and enhancing fire safety practices. Online complaint mechanisms such as RSC, Nirapon, and LIMA provide accessible channels for workers (including women workers) to report grievances. BWB's transformative action projects (mother@work, GEAR) can usher in systemic changes. These initiatives for stakeholders and workers enhance knowledge, capacity, and responsible practices. It is clear that the programme has contributed to the creation of a secure and healthy working environment for women, as well as achieve some

success in increasing the number of women in leadership positions within the sector (see table 6 for more detailed assessment).

Table 7. Assessment of Gender mainstreaming (leadership, and results) in the programme

Dimension and indicators	Achievement Levels*	Findings & Explanations
<p>Leadership Organizational Culture, Gender Parity, leadership development</p>	<p>Level 2: Meets minimum requirement</p>	<p>Gender parity showed patterns consistent with global trends whereby women comprised the majority of General Service Staff, and men dominated in more senior positions. The Govt. authorities such as DIFE, DoL, employers and workers' organizations portray less female leadership and representation of women. A recent GoB Gender Budget report (2023-24) showed that within the Ministry of Labour and Employment, 19.2% of DIFE and 21.2% of Department of Labour (DoL) staff are women. However, women comprise 15% (13) of 85 Grade- 2 to 9 officers. Of the 232 existing posts for Grade-10 officers, 51 (about 22%) are female. Clearly more parity is needed but this is a much broader issue, beyond the scope of the programme. The programme has facilitated sensitisation on these issues across different constituency partners.</p> <p>Until March 2023, BWB facilitated the formation of 321 PCs and 284 SCs, where 646,247 workers (56 % women) elected 3,504 PC representatives (47% women). These committees have a positive impact on enhancing workers-management dialogue factories. 588 female machine operators have been provided training to capacitate them for career progression, of whom 368 (63%) have been successfully promoted to supervisory positions.</p> <p>The programme reports document several examples of training of female trade union leaders including on GBV (C190), leadership skills, of male and female workers from trade unions, participation committees, etc. Undoubtedly, the programme is promoting women's leadership in various ways. However, it is expected that the progress on achieving in this area would be slow and require significant time and continued efforts. Thereby the rating is still at Level 2 on this dimension.</p>
<p>Results</p>	<p>Level 2: Meets minimum requirement</p>	<p>The RMGP II gender strategy showed the main objectives were to contribute to a more gender-inclusive working environment in the RMG sector and to increase the rights, voice, and representation of women at all levels through the activities of the RMG programme. The approach to gender undertaken by the programme covers seven focus areas: 1) To mainstream gender throughout the RMG programme; 2) To develop/review policies/regulations so that they are gender-responsive; 3) To undertake capacity building/awareness raising/knowledge building; 4) To engage men at all levels as partners for gender equality; 5) To make advocacy/communication gender responsive; 6) To carry out strategic partnership/coordination and 7) To pursue gender-specific research, M&E and accountability mechanisms. A good progress has been achieved on all of these elements of the strategy. As elements of these strategies relate to enhanced 'capacity and sensitisation', this level of result has been achieved.</p> <p>The next level of results is achieved when enhanced</p>

Dimension and indicators	Achievement Levels*	Findings & Explanations
		<p>capacities lead to practice and systems level change. This, to some extent, is being witnessed in institutions (such as DIFE, BGMEA, BKMEA) and some factories (especially those affiliated with BW) supported by the programme. Institutions are willing and are already changing their recruitment policies, their organisational norms, and rules to allow for more women to participate at different levels. This in itself is a significant achievement.</p> <p>The third level of results are essentially about representation, leadership, and welfare / well-being of women workers. Some progress is also being witnessed on this front e.g., DIFE's is achieving some gender parity, but it is a long way to go. Out of the total existing 481 posts, almost 21% (103) posts are filled in by women. Representation of women in leadership positions and top-level management is still low. Even in mid-level, there are a limited number of women; even in workers' organizations, there are not enough female voices. The federations and policy-making authorities are all dominated by men.</p> <p>The RMG sector still faces challenges such as wage discrimination, access to maternity benefits, availability of mandatory daycare and breastfeeding corners, enforcement of hygiene facilities, effective complaint mechanism and monitoring system, active anti-harassment committees, career advancement for women, mindset (stereotypical roles, mentally pressuring environment) etc. Clearly lot more is needed in terms of change in systems, cultures, and norms. This will take persistent efforts and time. Thereby the rating is still at Level 2 on this dimension.</p>

*As per UN Country Team -SWAP methodology scorecard, achievements are assessment in terms of three levels – Level 1: Approaching minimum requirements, Level 2: Meets minimum requirements, Level 3: Exceeds minimum requirements

Normative and tripartite mandate (EQ 19, 37, 38 and 39)

Tripartite collaboration was inherent by not everywhere due to practical considerations: Tripartite collaboration was skewed towards government as per the design of Phase II. It was expected that SDIR and WRC projects will support workers participation and BW initiative would work with factories, brands, and buyers. There was some overlap as some NI factories received DIFE and SDIR support and there were some which received SDIR and BWB support. However, in majority of factories, it was either SDIR or DIFE or BWB support. It is well acknowledged that sector organisations (BGMEA, BKMEA) were involved /contracted to provide training and other support to their member factories. Nonetheless, workers organisations in the RMGP II were less visible /engaged as the programme design focussed on improving regulatory, inspection and enforcement capacity of the government institutions. The real change on the ground as per the theory of change happens through constant tripartite engagement and actions. Practical considerations of delivering a programme within a limited timeframe made it difficult to involve tripartite constituents in all aspects of programming.

Youth were not included in its programming, but it was realized that including youth is necessary for sustained awareness of OSH across the country, so the programme established an agreement with VSO Bangladesh and engaged 1500+ youth in promoting OSH awareness across the country.

Environmental sustainability (EQ 40)

Though not a focus currently, environmental standards is the new direction of travel for large and SME factories (tier 1) in the RMG sector: The sustainability behaviours in the global supply chains are driven by regulatory requirements. The European Commission adopted a proposal for a Directive on corporate sustainability due diligence²⁷. The aim of this Directive is to foster sustainable and responsible corporate behaviour and to anchor human rights and environmental considerations in companies' operations and corporate governance. The new rules will ensure that businesses address adverse impacts of their actions, including in their value chains inside and outside Europe. In the RMG sector in Bangladesh, there is a surge in demand for sustainability certification services – environmental certification, energy audits etc. This demand is mostly coming from export oriented large companies and not SMEs at the moment. Some of these companies have started their journey towards meeting 'net zero' ambitions. This movement is expected to become stronger in the years to come. However, as part of RMGP, not much progress is observed on environmental compliances in the last decade (since 2013) as the focus was more on building safety, OSH, and social compliances. Environmental compliances have not yet become the norms. However, key informant argues that in the next decade, these compliances will gain increasing more currency. The businesses will start to understand their license to operate is not just about safety and social compliances, but environmental compliances matter too. Some momentum is already seen in Bangladeshi with certified 190 green factories. In the future, RSC indicated

Global brands sustainability is increasingly moving towards environmental standards and committing to reductions in their scope 3 footprints

H&M sustainability report 2022 talks about Green House Gases (GHG) emission reduction in its supply chain factories (which is also called Scope 3 emissions). The target of reduction in Scope 3 emission is 56% by 2030. Similarly, H&M has launched a new water strategy targeting reduction in use by 38% by 2030. The strategy focusses on reducing gender-based violence and sexual harassment in supply chain factories. It also talks about targets related to tier 1 supplier factories having trade union representations and collective bargaining agreements in place. GAP sustainability strategy talks about 80% sourcing from 'green' rated factories. It also talks about its tier 1 sourcing factories having grievance mechanisms for employee complaint and management and social compliances as per international labour standards.

- Based on corporate sustainability reports (accessed on the web)

that they plan to cover environment, waste management, and human rights due diligence as well and for which RSC is building its capabilities. The international brands (H&M and GAP, for example, see the box item above) are also increasingly demanding more attention to environmental compliances. Clearly the wind is flowing in that direction and therefore the business owners in the RMG (and other sectors) would need to notice this movement and start their preparations.

²⁷ https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en

4. Conclusions and Recommendations

4.1 Conclusions

Relevance of the programme in a changing context

The programme interventions were highly relevant to the RMG sector's situation, needs, and safety priorities. The programme is aligned with key national strategy documents and is pertinent to the four DWCP outcomes (full and productive employment and decent work opportunities, social protection, accountable governance, and women in the world of work). The programme is aligned with the country's development plans, which have goals pertaining to fire safety, garment industry capacity building to promote employment, enhanced environmental standards, and the elimination of gender bias in the industry. The programme directly contributes to the implementation of the NTPA. The programme has a very distinct gender focus and is too consistent with the ILO's gender equality mainstreaming strategy. The programme is pertinent to the demands of stakeholders (MOLE/DIFE, BFSCD, employers' and workers' organizations) and the policies of partners and donors, as well as the ongoing needs for reform in Bangladesh's RMG sector. Improving safety and social compliance became even more significant in the new context post Covid 19 impact.

Validity of the design

The programme is a reasonably well-designed intervention that sought to address sectoral challenges at the policy/regulatory, sector/industry, factory, and worker levels. RMGP II primarily intervened at the policy, regulatory, and industry levels, whereas BWB intervened at the factory and worker levels. Several structures, including the RCC, the ISU, and the NTC, were established to guarantee effective implementation and institutionalisation. The programme assisted the government in ensuring the remediation of all (NI non-compliances, facilitated a collaborative monitoring system for the implementation of CAP. The broad spectrum of RMGP II operations demonstrates the programme's contribution to institutionalising remediation strategies. The DIFE contributions to the NTAP and NAP on Bangladesh's Labour Sector (2021-2026) are among its most significant achievements. DIFE contributed to Model Factory Design Guidance and technical knowledge training for RCC, DIFE, BFSCD, BGMEA, and BKMEA engineers and inspectors. The partnership and collaboration with various ministries and agencies resulted in the establishment of a factory licensing OSS; BIDA, DIFE, BFSCD, RAJUK, and CDA are connected to the embedded online OSS system for industrial safety. RMGP II collaborated with industry associations (BGMEA and BKMEA) to improve working conditions in the RMG industry. The programme provided technical assistance to the members of these organisations, and the associations actively participated in the remediation of NI factories, provided training to their members (master trainers), and established and supported safety committees throughout the sector.

Remediation finance may have continued relevance for future programme, as remediation finance work phased out in 2019 as per the tripartite and donor agreed plan, and the NI factories may still require remediation supports. The programme support to OSS digitalisation was much needed but it is also part of Smart Governance agenda of the GoB and so the programme need clarity regarding where its support is most needed (e.g., related to people and processes rather than on technology and infrastructure provision) and can not be funded through the GoB own initiatives. Further, if the BWB becomes the convenor, then the structural modalities of delivering the advisory support would drastically change. This is being worked out.

Coherence of the design and underlying factors, changing context and programme adaptations

The RMGP II interventions were reasonably coherent and synergistic. The designs were synergistic as apart from remediation efforts in selected NI factories, RMGP II mainly operated at policy and legislative levels, while BWB, SDIR /WRC operated at factories and workers

levels to directly improve safety and social compliances at RMG factories by strengthening capacities, management systems and mechanisms (such as trade unions, safety committee, participation committee, Welfare Officers, anti-harassment committees) to deliver better workplaces. The programme was very adaptable to changing conditions throughout its implementation. The programme intervention in developing remediation framework and protocol, supporting transitions to nationalised initiatives, supporting new structures (RCC and then ISU), digitalisation initiatives (LIMA, OSS), and providing demand led support (e.g., cyber security) to Government departments are examples of adaptiveness to changing context. Further, exploring the interlinkages between licensing services, labour inspections (LIMA), and digitalized OSS has improved programme outcomes.

The programme anticipated, monitored, and managed risks well. The programme implemented several risk prevention and mitigation solutions. Preventive actions were effective, as eight of the 18 anticipated risks (including severe fires in RMG factories, a data breach at LIMA, and a reduction in GoB commitment) did not occur.

RMGP II worked with its tripartite members and development partners to implement a set of programmes. RMGP II with DIFE and NI factories, BWB, and SDIR Project extended supports to the WRC. There is no analysis in any programme documents of how SDIR /WRC results complemented and supported design and implementation of RMGP II activities or vice versa. The integration challenges of the two programmes thus limited complementarity and the coherence of one single programme. Further, the programme saw several constraining factors which were clearly external to the programme, outside its sphere of influence e.g., many of the NI factories were small factories, operating within shared building /rented floors, and so have no control over full building. Capital investments in this scenario was one of the challenges some of the factories faced for remediation. The programme staff was effective in reacting to the majority of the threats that arose. Other risks that would necessitate ongoing monitoring and programme support include a) implementation of the escalation protocol, b) transparency and credibility of remediation data, c) establishment of GoB (DIFE) relationships with private sector initiatives, d) facilitation of BGMEA/BKMEA to continue follow-ups on practice level changes in their member factories, and e) increased use of LIMA and OSS among intended users.

Effectiveness of the transition after Accord and Alliance

During the programme period, the most significant change in context was the transition of Accord and Alliance to nationally registered (also termed as nationalised) initiatives. There was an unresolved idea of how these measures would be institutionalised after the end of the programme period. Not all factories were covered by these initiatives, and a strong clarification in terms of the proper allocation of factories to distinct initiatives was required. This is where the RMGP II came in, assisting and facilitating a smooth transition of Accord and Alliance into new initiatives (RSC and Nirapon respectively) with minimal disruption to their respective lines of activity. These efforts have emerged organically and serve a specific segment of supply chain factories for international buyers. In terms of factory coverage, these initiatives have achieved a degree of separation.

There are numerous untapped opportunities for these initiatives to strengthen their connections and mutual learning. Differential standards of monitoring are followed by different initiatives, even after the initiation of the LIMA inspection module and associated protocol DIFE's cooperation modalities with RSC and Nirapon needs refinement. are not yet completely developed to address all safety and social compliance concerns. Further, there is a room for improvement in existing laws (BNBC, Fire Act, BLA) in Bangladesh for comprehensively defining and addressing safety, social and environmental compliances.

Effectiveness, including achievement of programme outputs and outcomes

The programme made significant progress across all four strategic areas and achieved most

of the log frame targets. The programme's outputs of policy/strategy documents, frameworks, tools, and advocacy materials are very impressive. The programme has contributed to the development of an OSH strategy, an NPA, a roadmap for DIFE, a gender strategy for DIFE, standard operating procedures for DIFE, factory design guidance, and numerous research reports, videos, and publications, modules, guidelines, etc. Clearly, the relevance of these knowledge resources as programme outputs extends beyond the RMG sector and Bangladesh.

While category 1 factories achieved 79% of remediation progress, it was also clear that about 55% of active factories achieved less than 50% of remediation progress during RMGP II. It was also noticed that BGMEA and BKMEA would need to carry out more follow up support after training to their member factories to ensure that enhanced capacities are translating into improved behaviours (in terms of safety culture) and actual change on the ground. Overall, some of the constraining factors to achievement of outcomes and impact in RMGP II were, a) inadequate incentives and access to finance for NI factories, b) slow process of change in mindsets of factory owners and managers, c) limited workers' engagement in different mechanisms, d) procedural bottlenecks, and coordination challenges among different government departments, e) limited follow up on capacity building and verification of remediation, f) deep-rooted social norms and resistance to change on the factory floors.

Long term changes, systemic changes, and impact

In terms of enhanced regulation and labour inspection reforms, the RMG industry in Bangladesh has made tremendous strides. DIFE's institutional capacities, structures and systems have considerably improved as it has established the ISU to institutionalize industrial safety. The capacity of the DIFE safety division succeeded the capacity of the RCC. DIFE is moving towards a function-based organisational based on labour inspection reform roadmap. DIFE enforcement capacity has also significantly increased with increased number of inspectors and regional and district offices, and trainings. DIFE was supported in preparing a number of strategy documents. During this phase of the programme, the initiative of OSS was established and made operational with the mandate of the program is to improve industrial safety governance. The government's support for digitalisation initiatives that increase the efficacy of regulation is justified, as it improves industrial safety. ISU support strategy at DIFE and programme level must have continued supports because it lacks adequate capacity. The evaluation has documented several other transformative changes. These long-term regulatory reforms are likely to assist the RMG industry in remaining more compliant, competitive, and forward-looking. The RMG industry as a whole has become safer over the past decade.

A comprehensive policy and regulatory reforms coupled with effective enforcements and sector-wide adoption of safety and compliance measures can be termed as 'systemic' change. The RMG sector has experienced significant process of systemic change happening in the RMG sector. The programmes led to improved policy and legal framework for safety compliances and remediation. The programme facilitated new structures (such as ISU within DIFE) that have the potential to improve industrial safety over the long run. The programme worked with a wide range of stakeholders, including the government and business associations. The development of safety committees in workplaces, consistent remediation efforts, routine factory inspections to detect and resolve safety risks and hazards and raised awareness of safety and health issues all examples of systemic changes underway. Over the past ten years, the number of accidents and injuries in the RMG industry has dramatically dropped as a result of these efforts. If systemic change and institutionalization continues, there will be less need for direct ILO assistance because "systems" of initiatives (DIFE-NI, BIDA-FBCCI, DIFE-ISU, RSC, BW, Nirapon) and institutions that are capable of carrying out their mandates (DIFE, BIDA, FBCCI, BKMEA, BGMEA, BEF, WRC, IBC) are available to do so.

Influence on trade, socio-economic development

The results of the programmatic interventions have influenced national priorities for trade and socioeconomic development. Bangladesh is the world's second-largest exporter of textiles and clothing. The RMG industry accounts for 81% of all export revenue in the country. Although Bangladesh has a number of competitive advantages over other countries in the RMG sector in terms of prices, on-time delivery, quality, and product advantage, other factors like safety and social compliance also play a role in the sector's expansion and its economic contribution to the overall national economy.

Transition to LDC graduation

Bangladesh's exports of apparel would likely no longer be eligible for preferential market access in 2026 when it graduates from LDC to developing nation status (preferential access is set to expire in 2029 for the EU market). Duty- and quota-free entry to the EU's Generalized System of Preferences (GSP) Everything but Arms (EBA) after leaving the LDC status would require compliance with 27 international treaties relating to labour and human rights, environmental and climate protection, and good governance. This implies that compliance with social and safety standards (and, in the future, environmental standards) would become more crucial for the nation in talks with the EU and other markets for preferential access. The accomplishments of the RMGP II have placed the country on a firm footing as safety, social (and environmental) compliances will acquire increasing importance and influence in negotiating the country's transition from an LDC to a developing country.

Despite these accomplishments, the industry still has a long way to go to attain an accident-free and decent work environment, particularly in small and medium-sized factories. Most of the transformative changes highlighted above have happened in the domain of policy and regulatory framework and among the relatively large and medium-sized factories and with workers working therein. Many of the SME industries, including those who are not covered by any initiative (expected to be 1000+ factories), are left behind due to financial constraints, and a culture of safety has not yet been established in many of these factories. There is little initiative in these factories to assure employee participation in the creation of a safe workplace, the reduction of employee risk, and the implementation of appropriate emergency responses. Although there are safety committees, participation committees, and anti-harassment committees, members are less cognizant of their roles, these committees exist but are less effective and/or functional. The workers are generally unaware of the DIFE helpline. Furthermore, translating DIFE's enhanced capacities into strategic inspection planning and implementation remains a challenge given the enormity of the tasks of the DIFE (both in RMG and non-RMG).

Compliance with international labour standards in terms of OSH is substantiated to a high degree, but neither social compliance issues nor environmental concerns are entirely addressed. The majority of RMG factories are compliant in terms of physical safety issues, and some factories (e.g., under BWB) have implemented programmes that address a broader range of social compliance issues (representations in safety and participation committees, collective bargaining; benefits such as maternity leave, decent wages; voice in terms of complaint and grievance addressing mechanisms; insurances such as medical, employment injury). Overall, beyond safety, social compliance (except in BW factories) is less evident, environmental concerns are more so in the factories. A comprehensive focus on safety and social (and environmental) standards needs to be ensured across the initiatives. Also, there is still a 'way to go' in terms of concrete improvement in working conditions and welfare of workers, including living wages and voice and representation of workers.

Remediation handover from BV, including risk profile of factories would need to be managed well by the DIFE. The ISU would need higher allocation of dedicated staffing. Positive implications of these institutional changes at GoB level would need to be realised for non-RMG sectors which may require wider policy advocacy with different departments and

ministries.

Building on the momentum so far, systemic change would require further processes of wide-scaling of impact and institutionalisation, a few examples of which are - a) In order to complete the CAP remediation in the NI factories and include a section of the still undiscovered tier 2 factories in the fold, a variety of support measures to the tripartite constituency are needed, b) Simplification and further improved functionality of OSS, LIMA, ISU, and ISF is needed, c) Inter-ministerial collaboration need further strengthening, , and d) remediation finance need to be redesigned and rebooted if it is found to have continued relevance and need. There is also a need to continue working on enhancing regulatory frameworks, with the national uniform and comprehensive code of conduct for safety, social, and environmental compliance being particularly important. Furthermore, the successes and challenges of implementing RMGP in the last 10 years indicates opportunities for appropriate adaptation and replication of the programme model of compliance in the RMG sector to non-RMG sectors—both export-oriented and risk-prone sectors servicing local markets.

Furthermore, the systemic change also means that the other initiatives (such as RSC, Nirapon) can learn from and adopt elements of BWB inventions related to social dialogue, skill building, and behaviour change initiatives at the factory floors. All private-sector initiatives can, in particular, invest in the skill development of female workers, establish effective grievance/complaint mechanisms, improve social dialogue and community-level collaboration, promote agency and opportunities for leadership and representation of female workers, and work toward a comprehensive culture and behaviour change among factory management.

Sustainability

The government continues to demonstrate commitment to industrial safety, compliance with labour standards, and labour governance. This entails incorporating effective practices into national policies, regulations, and frameworks, as well as enhancing the government's capacity to enforce labour laws and regulations. DIFE budgets have multiplied over last 10 years, by at least five times. DIFE budgets are still not adequate (more posts to be sanctioned) to implement new structures (ISU) and strategic labour inspections. LIMA would continue to get donor support. A number of other initiatives under the programme indicates sustainability. First, the BW revenue model, with increasing cost recovery, seems to indicate its sustainability. Factory Ambassador Program and Welfare Officer Training create sustainable change agents at the factory floor. The BIDA-Industry partnership for factory inspections beyond RMG sector shows the way for reforms to be scaled up and replicated beyond the RMG sector. RMG sector have made significant strides in terms of SOPs, code of conduct, manuals, tools, and capacities and so. The results of the programme are likely to be sustained as institutionalisation processes are progressing well. Currently, the programme has contributed to achieve Step 3 ('Integrating') of the 4-I institutionalisation framework. The RMG sector is well-placed to achieve Step-4 of '4-I' institutionalisation framework.

To go to step 4 of the institutionalisation, a few milestones would need to be crossed, such as a) a stronger institutional structure of ISU is needed, b) greater institutional coordination and sharing (e.g., LIMA and OSS become guiding force) is needed, c) greater involvement of private sector partners in tracking and enforcements (in PPP mode) by the governmental authorities, d) greater linkages between different initiatives, e) successful transfer of roles to industry bodies by BWB, f) institutionalising ISF, g) remediation finance redesign and pilot /scale up, and finally enhanced sector-wise awareness and knowledge sharing. Also, to that end, more interactions and knowledge sharing are needed among different actors within RMG for improving safety culture across the board. RSC and ISU engagement links would need to be further developed ensuring synergies. Further, there are several nationalised initiatives (RSC, Nirapon, BIDA-FBCCI) which needs to be integrated under one umbrella. DIFE is the most-appropriate structure to providing integrating platform. More interactions and knowledge sharing are needed among different actors within RMG for improving safety culture across the

board.

Contribution to gender equality

RMGP has supported a number of initiatives intended to foster a culture of gender equality and achieved some success. A range of 'gender integration' initiatives across different institutions have been undertaken. The programme has contributed to the creation of a secure and healthy working environment for women, as well as achieve some success in increasing the number of women in leadership positions of different committees. The programme has provided DIFE inspectors with capacity-building training on gender-related issues. DIFE has developed a gender road map that identifies key areas of work and proposes strategic directions for its work on gender mainstreaming. BWB has worked directly within the RMG industry to assure the presence of anti-harassment committees and women's representation on factory safety committees. Workers received training on gender issues and the safety and participation committee's function. Additionally, RMG management officials received training on supervisory skills, sexual harassment prevention, workplace cooperation, and participation committee duties and responsibilities. In order to lay the groundwork for ILO Convention C190's ratification, the programme emphasized raising industry stakeholders' awareness of the convention. BFSCD has introduced fire safety training for female firefighters, promoting gender equality and enhancing fire safety practices. Online complaint mechanisms such as RSC, Nirapon, and LIMA provide accessible channels for workers (including women) to report grievances.

DIFE gender roadmap is ambitious, needing strong implementation and cultural change within the organisation. Based on baseline and outcome studies, NI factories continues to have lower representation of women in PCs /SCs or as welfare officers. Concrete changes (childcare facilities, maternity leave and other benefits, complaint handling mechanisms, anti-harassment committee), freedom to complain require changes in norms and cultures at factory and societal level, which may require much longer and more strategic efforts. Social inclusion aspects (needs and priorities of people with disability) were not visible much in the NI factories, programme, and gender strategy documents except in BW factories where Integrated Advisory Solutions Workshops raised awareness on PWD at the factory floors.

Effectiveness of management arrangement

Operating with a dedicated teams for RMGP II and BW, composition of staffing was appropriate for the skillsets required, except that some BW advisors perceived a workload: The programme has a dedicated team for RMGP II (first four outcomes) and for the BW work (fifth outcome). The discussions with the ILO country team confirms that the team structure, skill set, and adequacy of staffing was appropriate. The role of advisor in BW has come in for a scrutiny as each advisor is allocated about 18 factories. Each advisor is responsible for conducting assessment, identify root causes, facilitate corrective action planning /road map, and support the factories for any troubleshooting required. The work of advisor is geographically distributed and require movements for 10-12 days in a month to provide hands on advisory services. An advisor conducts two assessment per month and prepare assessment reports that can be shared with the buyers. An overall progress report is also prepared every year for each factory.

The programme had all the partnerships needed for effective implementation and clearly benefited from high level of gender expertise. The programme had adequate partnerships to fulfil the programme requirements. The management team had adequate gender expertise; the programme achieved gender integration across all its main interventions.

M&E system in the programme captured progress well through internal mechanisms and independent studies. The programme had a well-functioning M&E system that monitored output and outcome indicators of programme Logframe /Results Framework. The M&E system collected sex-disaggregated data (to the extent possible) and captured and reported on

gender-related results. The strength of the programme M&E system lies in the fact that a clear picture of progress is available on most of the output and outcome indicators. The M&E system did well in commissioning verification of remediation data on NI factories as this verification resulted in corrections in the data. The M&E system also involved conducting independent baseline (2018) and outcome studies (2022) to track the progression on results being achieved.

The M&E system at BW has generated several layers of useful data for understanding progress and results and for better planning and implementation. BW operate in 10 focal areas and themes and regular data is generated on these through designated forms. This data feeds into the results matrix. BW also conducts research related to factory satisfaction, productivity and profitability assessment, impact on business and workers etc. BW maintains an integrated cloud-based system called STAR. All three focal team members have access to STAR and is updated every day. The system is accessible to the BW global team and is used to generate data on globally harmonized indicators. This helps in not only to monitor the programme progress but also in differential donor level reporting at country and global levels.

Some BW advisors perceived a workload. The representation of the workers /workers organisations in the PSC was considerably lower in the second phase of the programme. Baseline-outcome study dissonance in terms of designs, as purpose of both studies were different. Due to Covid-19 disruption, performance and impact of trainings were not assessed, and no data is evidently available in terms of adoption of OSH, functionality of safety committee and participation committees.

Good Practices

The programme has been exemplary in many ways, including regulatory initiatives, policy reforms, new structures, effective protocols, enhanced tripartite capacities, and its contribution to the safety of the RMG sector. The regulatory initiative of the NTPA governing legislation and policy, as well as administrative measures, not only facilitated the launch of the three initiatives—ISU, RSC, and Nirapon—but also directed their inspection and safety support measures. By facilitating and/or establishing these structures/institutions, the programme ensured that factories continued to make CAP-related progress. These structures and protocols are also assuring a profound change; new entrants in the RMG sector are compelled to invest in building, fire, and electrical safety.

The other exemplary accomplishment of the programme is the sustained improvement of institutional and technical capacities, resulting in the ability to provide inspection and safety support services to the majority of NI and export-oriented factories. The programme increased the government's capacity to assure the industrial safety inspection system and remediation efforts.

Another exemplary achievement of the program is the culture of collaboration among various stakeholders, which is manifested in several collaborative initiatives such as OSS, BWB, SDIR, WRC, and several other activities of the programme implemented in collaboration with industry/employers' organizations and workers organizations. This has established a tripartite approach of programme design and implementation.

DIFE has made a considerable commitment to gender mainstreaming as a result of the programme's ongoing follow-up, awareness, and advocacy actions. The DIFE's Gender Roadmap is a 10-year strategy plan for integrating gender into all aspects of its activity, including in the non-RMG sectors. The initiative will challenge gender stereotypes and foster a positive perception of women's capabilities throughout the country. This is mainly due to the government's willingness to see improvements in DIFE's institutional and technical competence, with a particular emphasis on gender mainstreaming. The adoption of best practices will likely continue to promote gender equality and empowering women.

Lessons learned

RMGP II provides an excellent collaborative framework for the RMG industry to implement safety and social compliance reforms. As the initiatives operate on a compliance spectrum ranging from safety (DIFE-NI, BIDA-FBCCI) to safety+ (RSC and Nirapon) to social compliance (BW), there are several valuable lessons to be learned. Each initiative's governance and operation model are unique, providing valuable insights into how effectiveness can be attained individually and collectively. BIDA-FBCCI is an example of how the government's safety initiative can be expanded to more than 5000 factories within a few months. Clearly, each of these initiatives provides programme designers and decision makers with valuable lessons for future initiatives aimed at sector-wide or national reforms.

The safety plus approach has greater potential for enhancing working conditions in RMG factories: There exist a number of complementary initiatives, including DIFE (NI and BIDA with FBCCI), BWB, RSC, and Nirapon. Driven by investment promotion, PMO was involved in ensuring safety processes across all sectors in Bangladesh (BIDA and FBCCI evaluation of 5206 factories beyond RMG). Every initiative is governed by the standards outlined in the BLA, and all initiatives give safety standards priority. Some addressed safety standards, while others addressed a broader range of social compliance issues. Clearly, learning from all of these initiatives is necessary. As demonstrated by the evidence gathered for this evaluation, the Safety+ approach to compliance is likely to produce higher quality outcomes. The standards pursued by various initiatives can gradually build on the safety+ and social compliance (and subsequently environmental compliance) standards and approach, as this is likely to result in increased competitiveness and brand-value of the RMG exports and sector.

4.2 Recommendations

The recommendations follow the evidence presented in the evaluation findings. Recommendations are proposed for the ILO Country Office, for the tripartite constituency, for the Government of Bangladesh and for the donors /other UN organisations. The recommendations also indicate priority (high /medium/low), resource requirements (high/medium/low) and timeframe (short/medium/long) needed for the recommendation to be implemented.

Recommendation 1: Develop a fully integrated third generation of reforms / next phase of the programme: In the last decade, post Rana Plaza (2013), there has been considerable affirmative actions and incremental change in the RMG sector. The programme model has been successful in accelerating this trajectory of change. But there are lessons to be learnt as well. Therefore, the third generation of reforms in the RMG sector should be a more integrated intervention. The reforms in the first and second phase of the programme have established the foundations for bigger and more ambitious process of change. Next phase of programming should, ideally, focus on:

- The RMG sector to complete the ongoing process of 'systemic' change and 'institutionalisation' and to ensure sustainability of structures building on the momentum achieved so far. This is not the time yet for the ILO to withdraw from the RMG sector as the ILO is needed for a range of support measures to the tripartite constituency for completing the CAP remediation in the NI factories and including a portion of still uncovered tier 2 factories in the fold. The ILO support is also needed for streamlining OSS, LIMA, ISU, ISF, and for facilitating inter-ministerial coordination, unified code of conduct, remediation finance redesign and reboot etc.
- The non-RMG sectors: Suitable adaptation and replication of the RMG model of compliance to other non-RMG sectors – both export-oriented and risk-prone sectors serving domestic markets. The data from the BIDA-FBCCI assessment of 5206 factories

can aid in risk profiling and selection of priority non-RMG sectors. This would also require policy advocacy (by the ILO) with different government ministries and departments.

The next phase of programming should ideally have the following strategic areas /programme components:

Strategic Area 1: Prevention, Assessment and Remediation – in RMG and non-RMG sectors, targeting a mix of factories – large as well as SMEs. Working with the relevant tripartite institutions depending on the sectors of work. Ensuring that Building Code Authority (Ministry of Housing and Public Works) is involved for strengthening the ‘preventive’ approach

Strategic Area 2: Piloting and scaling up the BW convening model in the RMG sector, including further expansion of the BW work in the RMG sector

Strategic Area 3: Social dialogue and industrial relations in the same factories where prevention, remediation and BW convening model activities are being carried out

Strategic Area 4: OSH in practice – a national-wide educational and advocacy campaign targeting factories, workers in all key export-oriented and risk-prone domestic market sectors and also youth in general public and universities

The next phase of programming can potentially take on a code of conduct of remediation which focusses on safety + social compliances as this is found to be more impactful and aligned with all the four outcomes of the DWCP 2022-26. This may be ambitious and so a staggered (phase-wise) approach can be adopted.

Responsible Unit	Priority	Time Implication	Resource Implication
ILO country office in Bangladesh	High	Long-term (5+ years)	High resource requirements

Recommendation 2: Private sector led initiatives develop strong linkages within and with DIFE: The evaluation has indicated a strong need for all the private sector initiatives to develop strong linkages within and with the DIFE-NI initiative. Specifically:

- DIFE being the authority of the inspection of all factories, shops, and establishment of the country, DIFE cooperation modalities with RSC and Nirapon can be developed further.
- The code of conduct and modalities of operations between RSC, Nirapon and BW can be unified (with coverage on safety, OSH, and social compliance issues) so that buyers and brands can receive one report from one factory. A joint monitoring and assessment framework for factories under the RSC, Nirapon, and DIFE that addresses all issues related to remediation, inspection, and social conformance will help reduce duplication of efforts and resources.
- Initiatives can share their data on one platform (potentially LIMA or any other open-source platform). Synergy and data sharing with LIMA remediation tracking module by all initiatives have not yet gained currency. LIMA RTM needs further development to achieve the status of a data integration platform for all the initiatives, which is not what it is currently designed for. Another opportunity is an open-source hub. Integration is worthy cause as it can provide different uses to different types of users.
- Initiatives can organise regular knowledge exchange and learning sessions with each other, potentially under the umbrella of Industrial Safety Forum

The collaborative approach would enable all three initiatives to improve efficiency and effectiveness of their work.

Responsible Unit	Priority	Time Implication	Resource Implication
DIFE, working with the ILO-BW team + other private sector initiatives (RSC, Nirapon)	High	Short-term (within the next one year)	Low resource requirements

Recommendation 3: Private sector initiatives (BW, and also RSC and Nirapon) can

strengthen their work in social dialogue, skill building and leadership promotion of women, and behaviour change of factory management: BW interventions have amply demonstrated the value of social dialogue, skill building and behaviour change initiative at factor levels. BW experiences have also demonstrated that more work is needed in these areas to achieve inclusive working environment at the RMG factories, especially at the SME factories. Learning from these experiences, and for achieving systemic change (as was the intent of RMGP II), all the private sector initiatives can potentially include these elements of work in their programming. The initiatives can particularly invest in female workers' skill development, establish effective grievance/complaints mechanisms, enhance social dialogue and community-level collaboration, promote agency and opportunities for leadership and representation of women workers and work towards a comprehensive culture and behaviour change among the factory management. By promoting these measures, the private sector led initiatives (including BW) will truly achieve not only safe but also a more inclusive and equitable environment in the RMG sector.

Responsible Unit	Priority	Time Implication	Resource Implication
ILO-BW team working with other private sector initiatives (RSC, Nirapon)	Medium	Medium-term (2 to 3 years)	Medium resource requirements

Recommendation 4: Framing a national unified code of conduct for safety, social and environmental compliances: There is a realisation that the country needs a unified code of conduct on safety, social and environmental compliances, aligned with existing regulation (BLA /BLR). There are country examples such as China and Vietnam who have comprehensive national laws that guide all initiatives for safety, social and environmental compliances. A national unified code will ensure that there are same rules for every buyer as national law will uphold always in meeting national /international labour standards. Framing of a national unified code in Bangladesh can be initiated through an expert committee consisting of academics, legal professionals, representatives of member organisations (industry and workers). Buyers are likely to accept comprehensive national laws as it would enhance overall reliability and credibility of the standards followed in the country. This process can be facilitated /supported by the ILO Bangladesh. The process of developing a national unified and comprehensive code of conduct for safety, social and environmental compliances would necessarily require a gradual /phased approach. It should first cover export-oriented sectors (such as RMG) and then risk-prone domestic sectors (such as plastic, chemical, ship breaking, textile, leather /tanneries). Unified code would guide all nationalised and international initiatives supporting sector-wide compliances. It can also be mandatory for all the factories and establishments not supported by these initiatives. While the safety standards can be more generally defined for all sectors, a sector-specific unified code would be needed on social and environmental compliances. This is so as social compliances would depend on social (workers profile, purchasing power) and economic (sector productivity, contribution to the economy) profile within the sector and other pertinent issues. In the unified code, different levels of adherence can be defined for different size of factories and establishments. Level 1 should be the minimum code of conduct for all factories and establishments irrespective of size. This segmented /classification approach is likely to help in effective enforcements and also motivate factories to reach higher levels of compliance on the defined code of conduct. This is also likely to set a momentum of long-term process of economic transformation of the country from a lower to middle income status.

Responsible Unit	Priority	Time Implication	Resource Implication
ILO country office in Bangladesh supporting the Govt. of Bangladesh	Medium	Short-term (<1 year)	Low resource requirements

Recommendation 5: DIFE and ISU strengthening measures are continued to complete 'systemic' change and institutionalisation processes underway: The ongoing process of systemic change and institutionalisation would need further boost through actions by the Government of Bangladesh and DIFE. Some of these actions can be supported by the ILO-Bangladesh, in terms of peoples and processes (and not so much on heavy costs of

technology and infrastructure). The key interventions are summarised below:

- A stronger institutional structure of ISU a developed with more staffing and financial resources. The ISU would need systematic approach to capacity building of labour inspectors in the RMG (and other) sectors. Remediation processes (as handed over from BV) would need to managed well by the ISU to ensure completion of CAP and inclusion of currently uncovered factories. It is important to ensure effective implementation of the escalation protocol for remediation and also the credibility and transparency of remediation data.
- Greater institutional coordinations among different departments of the GoB is needed. DIFE /ISU can facilitate this with support of the ILO-Bangladesh. This is to ensure that LIMA and OSS achieve a higher degree of functionality and increased use among intended users.
- BGMEA and BKMEA are supported for conducting follow ups with their constituents in terms of ensuring 'practice' and 'behaviour' level changes at the factory floors which constitutes concrete improvement of safe and decent working conditions for the workers (including women workers) in the RMG sector. BGMEA and BKMEA should ensure that its member factories implement 'whatever it takes' to achieve a strong OSH culture through active involvement of both the management and the workers.
- Continue the operation of the ILO collaboration with FBCCI to extend the safety and health issues in all RMG factories and in other high-risk sectors. The ILO Bangladesh can support FBCCI in analysis of data it has gathered for 5206 factories as it can help in not only risk profiling of different sectors and districts but also in policy advocacy for a safer and socially complaint industries in the country.

Responsible Unit	Priority	Time Implication	Resource Implication
DIFE, ILO-Bangladesh, working with BGMEA, BKMEA and FBCCI	High	Medium-term (~2 year)	Medium resource requirements

Recommendation 6: Re-examine relevance of remediation finance and redesign and reboot if needed: Remediation finance did not find takers in the first instance when it was launched. The factories, which need remediation finance, are more vulnerable as safety risk factors are very high. Financial Institutions (FIs) consider these factories as 'high risk' assets. Most of these factories are SMEs – a scale not favoured by commercial /competitive finance. Further financial packages offered currently are found to be cumbersome. FIs prefer to provide loans against credit guarantees /collateral/against fixed assets. But many of the SMEs are established in rental space and so unable to give guarantees. Remediation of these factories is not necessarily are remediation of entire buildings, model is sometime cumbersome to handle remediation financing. Given a spate of challenges, it is no wonder that the remediation finance so far has not been successful. To get a workable model of remediation finance, several modalities are needed, such as, a) consider dynamic and more flexible financing conditions and find out alternative ways for providing the finance to factories who need it most, b) simplify documentary requirements and procedures, c) BGMEA /BKMEA can do more to persuade their membership towards taking more responsibility (motivation can come from different structure of memberships- observer, associate, full etc) and facilitate finance guarantees to their member factories, d) risk sharing credit guarantees provided by the donors and GoB. The evaluation recommends an assessment of the root causes, relevance and need for the remediation finance. Based on this assessment, redesign, and reboot of remediation finance products is needed with support from other UN agencies (such as IFC), donors and the Government of Bangladesh. Though not part of its mandate, the ILO can facilitate this process by collaborating with donors and other UN agencies if such an initiative is found to improves systemic change in the RMG sector. Remediation finance should ensure compliance with building regulation in such a way that no remediation would be needed in the future.

Responsible Unit	Priority	Time Implication	Resource Implication
ILO country office in Bangladesh, working with other UN organisations	High	Short-term (<1 year)	Low resource requirements

5. Lessons Learned and Emerging Good Practice

Exemplary achievements and good practices (EQ 41)

- ***The significant transformation in the safety culture can be attributed to a combination of regulatory initiatives, policy reforms, new structures, effective protocols, working models, and strengthened capacities of tripartite stakeholders, ultimately resulting in a safer RMG sector:***

The regulatory initiative of the NTPA guiding legislation and policy, and administrative measures not only facilitated the launch of the three initiatives—ISU, RSC, and Nirapon but also guided their inspection and safety support measures. Similarly, NPA on OSH, national OSH profile, and LIMA, OSS are exemplary achievements of the programme. Structural interventions played a significant role in making programmes more effective and successful. A number of new structures /institutions were created during the programme period. RSC took over Accord, Nirapon transitioned from Alliance, and the remediation responsibilities of NI factories were entrusted to DIFE temporarily to RCC and are currently in a permanent structure of ISU. By facilitating and /or establishing these structures /institutions, the programme ensured that factories continued to make progress on their CAP. Remediation protocol also helped in this regard. These structures and protocols also ensure that the new entrants in the RMG sector are compelled /motivated to invest in building, fire, and electric safety first. This is a profound change.

- ***Sustained enhancement of institutional and technical capacities and the culture of collaboration amongst different stakeholders:***

Another exemplary achievement of the programme is the sustained enhancement of institutional and technical capacities leading to the ability to cover most NI and export-oriented factories in terms of inspection and safety support services. While it is true that the programme support was more geared towards the remediation of all NI factories, the enhancement of the DIFE's capacity for an effective and improved labour inspection system and the strengthening of regulatory environments governing OSH is expected to support remediation in non-RMG factories as well. The programme enhanced the government's capacity to ensure industrial safety regulation, inspection system, and remediation activities. The programme also relates to the culture of collaboration amongst different stakeholders manifesting in several collaborative initiatives such as OSS, BWB, SDIR, WRC and several other activities of the programme implemented together with industry /employers' organisations and workers' organisations. This has set an example of a tripartite model of programme design and implementation.

- ***Gender roadmap is a pioneering initiative at a government department in Bangladesh:***

The program's continuous follow-up, awareness, and advocacy initiatives have generated a significant commitment from DIFE towards gender mainstreaming. The DIFE's Gender Roadmap is a 10-year strategy plan for mainstreaming gender in all its work, including non-RMG sectors. This is a major initiative at a government department in Bangladesh, as this will set the tone for other departments to follow. This initiative will challenge gender stereotypes and promote a positive perception of women's capacity within the country. This is happening primarily due to the government's willingness to witness enhancements in the institutional and technical capacity of DIFE, with a specific focus on gender mainstreaming. The government (MoLE) responded positively and actively participated in the process. The adoption of best practices is expected to persist, supported by further assistance in promoting gender equality and empowering women.

- ***Enhancing Awareness and Accessibility by translating and Distribution of Key Documents for Promoting Safety and Workers' Rights in the factories:***

The translation, printing, and distribution of the ILO Convention C190 and R206, along with other important policies and materials such as the OSH profile policy, COVID-19, and C190 Issue Brief, and SCs committees' responsibilities booklet, proved to be a commendable initiative. Translating these documents into Bangla, the mother tongue of the majority of factory workers, facilitated better understanding and accessibility. The factory visit evaluator observed that workers were aware of the laws and policies, indicating their tangible applicability at the grassroots level. The use of graphic presentations, posters, leaflets, and wall hangings inside the factories was recognized as an impactful change, as visual aids conveyed information effectively. Further workshops, training sessions, and increased circulation of materials in Bangla would be beneficial for the factory workers, ensuring enhanced understanding. The efforts of ILO, employers' federations, brands, and the Ministry of Labour and Employment, in alignment with RMGP II gender strategy focus area 3 and the mandates of ILO conventions and Sustainable Development Goals (SDGs) 5, 8, and 10, contribute to capacity building and knowledge generation initiatives in this context.

- ***Better Work Bangladesh's Initiatives for Gender Equity & Women's Empowerment:***

Better Work Bangladesh (BWB), a strategic area of the RMGP II, has actively engaged with the RMG industry to promote gender equity, women's empowerment, safety measures, ensuring women's inclusion in safety committees and the establishment of anti-harassment committees. Notably, BWB has launched initiatives like Mother@Work and GEAR to support working mothers and promote gender equality for technically skilled female workers in the RMG industry. While BWB has gathered positive impressions from management, employers, workers' organizations, and factory-level workers, there is a need to expand these initiatives to a larger number of factories to benefit female workers. These initiatives hold the potential to improve the conditions of female workers in the RMG sector, helping not only the women themselves but also employers, the overall production, and future generations of the country, aligning with the RMGP II gender strategy, BW objectives, ILO mandates, and SDGs 5, 8, and 10.

Lessons learned (EQ 42)

- ***A successful sectoral reform model would essentially require a strong collaborative architecture, with a range of initiatives working with a common purpose even though modalities of implementation are different.***

The RMGP II was about the ILO initiative of working with DIFE and NI factories. It was also about other ILO initiatives such as BWB which was part of the phase II programming. In addition, there were a range of initiatives that were either private sector driven (RSC, Nirapon) or GoB driven (DIFE) or public private partnership model such as BIDA with FBCCI. This provides an excellent collaborative architecture for the RMG sector to implement reforms related to safety and social compliances. There are several useful lessons here as each of these initiatives are operating on a compliance spectrum from safety (DIFE-NI, BIDA-FBCCI) to safety+ (RSC and Nirapon) to social compliance (BW). Each initiative has a different governing and operation model (see table 7), providing useful lessons on how effectiveness can be achieved individually and altogether. RSC have been particularly very successful in remediation. Nirapon has been very successful in soliciting and resolving workers complaints. BW has been very successful in going beyond safety to social compliances thereby improving working conditions and welfare of the workers. DIFE has been successful in working with a challenging set of factories (including some of the tier 2 factories) which have a lesser incentive to change than the buyer-linked factories other initiatives are working with. BIDA-FBCCI is an example of how the Government intent of safety can be scaled up within a few

months to 5000+ factories. Clearly, each of these initiatives provide useful lessons for the programme designers and decision makers for any future initiative aiming at sector-wide or country-wide reforms.

Table 8. An overview of RMG and other sector initiatives for making the sector structurally safe and socially compliant

Aspect	RSC	Nirapon	BWB	DIFE	BIDA-FBCCI
Mandate	Sustainable workplace safety programmes, enabling sustainable business and developing the supply chain	Workplace safety in Bangladesh through factory participation in a Safety Management Program	Improving the lives of the workers, their families, and their communities, and increase the competitiveness of the ready-made garment sector	Ensuring workplace safety including fire safety, structural integrity, and welfare of workers	Strengthen workplace safety and health at institutional as well as enterprise levels
Type of Initiative	Private sector initiatives of RMG manufacturers, global brands and retailers, global unions, and their local affiliates; Licensed by the Ministry of Commerce (MoC) and coordinate work with the Ministry of Labour and Employment (MoLE) and the various related ministerial departments	Private member led organization -group of 55 members	Partnership between the International Labour Organization (ILO) and the International Finance Corporation (IFC),	Government department under Ministry of Labour and Employment	GoB organisation (BIDA) in collaboration with a private sector industry body apex organisation (FBCCI)
Core elements of work in relation to the RMG sector	Factory inspections, remediation monitoring, safety training and independent safety & health complaints mechanism	Safety Support in the form of the 90-Day Workbook and Reporting Process, Education and Training, and Helpline Services.	Build in-factory capacity to improve working conditions and establish management systems through assessment visits, advisory services, and training; and assist in building constituent capacity to achieve structural, sustainable change in labour administration, industrial relations, and social dialogue systems.	(a) inspection of factories and establishments, prosecution against the violations of labour laws in different courts; (b) approval of lay-out plans, construction, and extension of factories; (c) issue of registration and licenses; (etc.	Capacity building and promotional activities to strengthen workplace safety and health; safety representatives and safety committees development
Administrative authority/ Board members	18 Board of Directors (6 each brand, TU, employer, 1convenor ILO, 1 each co-chair)	9-member team including brand, manufacturer, and NGO	Public sector, tripartite initiative,	Government - Ministry of Labour and Employment	Business apex body) president 1, senior vice president, 1 vice president 6, Directors 63

Aspect	RSC	Nirapon	BWB	DIFE	BIDA-FBCCI
Organization set up/ Collaboration		Safety Support facilitated by ELEVATE; Worker training facilitated by BRAC; Helpline supported by Amader Kotha	47 international brands and retailers	The monitoring the enforcement of legal provisions regulating work and workplace is carried out by four sections—(i) safety; (ii) health; (iii) general; and (iv) administration and development.	9 Divisions including FBCCI safety council, and ADR work in collaboration with BIDA, ILO
Personnel / membership	199 staffs (with 76 engineers)	Work carried out by ELEVATE, BRAC, Amader Kotha		2013 --- 92 out of 183 2023 --- 393 out of 716 (Another 96 inspectors are in the process of recruitment)	106 Chamber of commerce and 402 Trade and Industrial Association
Number of Inspection/ safety support	760 initial inspections ; 6206 follow-up inspections (RSC period June 2020 to till April 2023)	265 safety support visits			5206 factories
Coverage of factories	1883 (1701 inspected and 182 newly enlisted)	335 factories	438 factories (1.27 million workers supported of which 50% female workers)	1549	5206
Spectrum of compliances covered	Structure, Electrical, and fire	Engineering safety solutions in factories that have closed their CAPs	Assessment visits, advisory services, and training to improve working conditions and establish management systems for sustainable change in labour administration, industrial relations, and social dialogue systems.	Accident prevention and compensation, health and safety, maternity, and welfare benefits, and working hours, leave and rest, wage, and employment contract	Structural safety, fire, electrical, machine, and boiler safety, explosive materials management, and environmental issues
Inspection / safety support progress		100% submitting 90-day workbooks, 368 Technical changes			

Aspect	RSC	Nirapon	BWB	DIFE	BIDA-FBCCI
		reported, and CAP in progress for 41 factories			
Escalation	646 factories (stage 1- 270; Stage 2 -170; Stage 3 - 206); De-escalated -376				
Overall remediation Progress	Remediation - 91.3%	work in CAP closed factories		Overall - 54 % (out of 1549 factories, Open and DIFE monitored - 538 factories, Open & jointly monitored - 120 factories, joined private initiative - 13 factories, Closed - 754 factories, Relocated or shifted - 113 factories, and EPZ - 11 Factories)	
Status of Remediation in factories					
0%-30%	22			250	
31%-60%	77			163	
61%-90%	255			127	
91-100%	1347			118	
Total factories	1701			658	
Escalation stages:					
Stage 1	170 (9%)				
Stage 2	316 (17%)				
De-escalated	392 (21%)				
Not in escalation	1005 (53%)				

Source: Compilation by the evaluation team based on publicly available sources and key informant interviews

- ***Safety plus approach has higher potential in improvement of working conditions in the RMG factories:***

Several complementary initiatives - DIFE (NI and BIDA with FBCCI), BW, RSC and Nirapon exist. Driven by investment promotion, PMO involvement in ensuring safety processes across all sectors in Bangladesh (BIDA and FBCCI assessment of 5206 factories beyond RMG). Every initiative is guided by standards defined in the BLA and all initiatives have prioritised safety standards. Some addressing safety standards, and some focussed on larger spectrum of social compliance issues e.g., BWB. RSC continued factory inspections, remediation monitoring, and workplace programmes. BW have a widened scope of action as it promotes social compliance and labour standards. Nirapon worked with CAP-closed factories and invested in engineering safety solutions and guiding and educating employees, managers, and owners. Clearly there is a need for lesson learning from all these initiatives. Safety+ approach of compliance is likely to generate better results as have been demonstrated by the evidence compiled by this evaluation. The standards pursued by different initiatives can progressively build on the safety+ and social compliance (and subsequently environmental compliance) standards and approach as it is likely to lead to improved competitiveness and brand-value of the RMG sector and country's exports.

- ***Still a 'way to go' in terms of translating enhanced DIFE capacities to achieving impact beyond the RMG sector:***

In theory, enhancement of DIFE's human resources and capacities during RMGP II means that DIFE can utilize this enhanced capacity and LIMA digital inspection platform progressively to cover other factories beyond the RMG sector. However, this continues to be a challenging prospect as this would require continued interests of the government to change the safety culture beyond the RMG sector. The Government now perceives well that the decades of investment in promoting workplace safety have to a great extent, materialized at least in the RMG sector. Bangladesh has evaded the negative perception of the brands and buyers regarding the state of safety in its supply chain. The current legislative landscape may prevent DIFE from applying meaningful sanctions for non-compliance, undermining the organisation's enforcement capabilities. Digitilization and effective inspection face implementation challenges due to technological barriers, lack of infrastructure, or resistance to change at the enterprise level. The current manpower of DIFE of the country is yet limited in view of the ever-expanding private sector factories in the country. The human resource and capacity of the newly formed safety unit too must be expanded in order to conduct proactive inspections in RMG and other sectors.

- ***Gender mainstreaming and an enabling working environment requires addressing societal attitudes and establishing supportive systems through continuous and consistent advocacy and innovation:***

The programme's continuous and consistent follow-up, awareness, and advocacy initiatives have generated a significant commitment from DIFE towards gender mainstreaming. As the DIFE GRM is 10 years long-term strategy plan, it is assumed that special attention will be given to creating opportunities and supporting women to undertake leading roles in these sectors. DIFE will expand its efforts to improve social compliance in other priority sectors, building on its success. Efforts will be made to challenge gender stereotypes and promote a positive perception of women's capacity within the country. Through the BWB, the programme initiated many innovations for empowering women workers by protecting the rights of working mothers and promoting participation of women in leadership roles, with a focus on long-lasting mindset changes through comprehensive awareness campaigns at all levels. The programme clearly learnt that gender mainstreaming and an enabling working environment requires addressing societal attitudes and establishing supportive systems through continuous and consistent advocacy and innovation

- ***Risk-profile based strategic inspections, digitization, and stronger enforcement capabilities are likely to pave the way for DIFE to become more effective in the future:***

Although DIFE's capacity has increased recently, it's crucial to note that the private sector has expanded tremendously as well. In 2019 compared to 2006, there were 33% more private industrial establishments (BBS, 2020). By extending its capacity at the same rate as the sector, DIFE may find it challenging to keep up with the industry's expansion as a governance organisation. Therefore, DIFE's limited capacity, notably in terms of the availability of inspectors, represents a continuing concern. While future efforts to increase DIFE's capacity should still be made, there is a need to concentrate on making the most use of the current resources. Even with limited human resources, it is possible to increase the monitoring system by adopting digitization and putting effective inspection procedures into place. The DIFE should prioritize inspections based on the degree of risk and vulnerability rather than on the industry's size. However, given the current legislative landscape, DIFE is unable to apply meaningful sanctions for non-compliance. Therefore, future initiatives should focus on strengthening DIFE's enforcement capabilities. Additionally, developing new abilities becomes essential as new sectors emerge. Therefore, future efforts should focus on strengthening the technical and digital proficiency of DIFE inspectors.

- **The long-term success of the ISU relies on the active participation and support of the government, particularly in providing ongoing technical expertise and resources as the programme expands and evolves with the growing business needs**

A noteworthy accomplishment of the RMGP II is the quick and effective development of ISU. However, the participation and assistance of the government will be essential to ISU's long-term success. ISU will demand more technical know-how and personnels in the future as the business keeps growing. It will be up to the government to continue to support ISU with the needed requirements for ensuring that it succeed in its mission.

- **Addressing legislative gaps and ratifying conventions such as C190 can further advance country' credentials in international export markets**

There are still some gaps in the legislative framework for labour rights and safety that need to be filled in order to bring it into compliance with international labour standards (for instance, C190 is still waiting to be ratified). The convention 190 acknowledges that gender-based violence and harassment disproportionately affects women and girls, and recognizing that an inclusive, integrated and gender-responsive approach, which tackles underlying causes and risk factors, including gender stereotypes, multiple and intersecting forms of discrimination, and unequal gender-based power relations, is essential to ending violence and harassment in the world of work. While RMGP II's support have sparked momentum for essential improvements, it is essential for all stakeholders to continue supporting this momentum going forward. This will credibly enhance the country's credentials in international export markets.

- ***DIFE's helpline service is a much-needed support to workers to raise their grievances but it would need to improve its accessibility, gender sensitivity, and prompt resolution to maintain trust and encourage utilization:***

The direct helpline service, which DIFE introduced, has made it easier for employees to file grievances, but there are still a number of issues that need to be resolved if the system is to be effective. First, it's crucial to guide a female caller to a female focal point when she dials the helpline since women could feel better at ease discussing delicate topics like harassment and health with a female representative. Second, more awareness and advertising campaigns are required to inform employees about the helpline and its offerings. Last but not least, it is

critical to respond to complaints as soon as possible because a slow response may deter employees from using the service.

- ***While the OSH plan of action is a valuable resource for promoting workplace safety, emphasizing its implementation, regular review, and monitoring by stakeholders is necessary to ensure its effectiveness and adaptability to evolving needs and challenges in occupational safety and health:***

The OSH plan of action is an excellent resource for directing efforts to promote workplace safety. However, in order to produce significant outcomes, it is necessary to emphasize the plan's implementation at all three levels (policy, industry organisations and factories). The OSH strategy should be periodically reviewed to evaluate its progress and determine any alterations, both inclusions and exclusions, that may be required to improve its efficacy. Stakeholders may make sure the plan stays relevant and adaptable to changing requirements and problems in promoting occupational safety and health in the workplace by monitoring and reviewing the plan's execution.

7. Appendices

Annex 1 : Evaluation Question Matrix (EQM)

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment		
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors	
RELEVANCE	Context alignment	In what ways, the programme is aligned with the needs and priorities of national stakeholders, GoB and social partners, and beneficiaries; and is consistent with ILO, partners, and donors policies? In what ways, the programme addresses the ILO's global commitments and SDGs, as well as gender strategy?	- Demonstrating conformance/ non-conformance of the programme design with the needs and priorities of national stakeholders, GoB and social partners, and beneficiaries - Analysis of the extent to which the programme addresses the ILO's global commitments, and gender strategy	- Secondary literature - programme design documents - programme monitoring data and studies - Key informants	- Review of programme documents and monitoring data (PD) - Review of secondary literature (SL) - Key Informant Interviews (KII) - Focus Group Discussions (FGD)	✓	✓	✓	✓	✓		✓				Analysis of quantitative data and qualitative perspectives from programme documents and key informants to distil appropriate findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment	
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors
	Context responsive	EQ1a: To assess relevance of the programme considering the changing context of the programmes e.g., Accord and Alliance leaving and RSC's existence, and other underlying factors beyond ILO's control that affected and might affect the achievement of the programme outputs and outcomes '- In what ways, the programme is responsive to evolving context – Covid-19, closure of Accord and Alliance, creation of two local initiatives; to changes in the business, socio-economic, political, and institutional environment?	- Citations and instances demonstrating changes in the context since 2017 (RMGPII), and how these contextual changes have elicited programmatic response and how effective that response have been - Citations and instances; Citations and instances demonstrating consistency (or inconsistency) of programme response to changing realities	- Secondary literature - programme design documents - programme monitoring data and studies - Key informants	- PD - SL - KII	✓	✓	✓	✓	✓				✓	Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions
	Complementary	- In what ways, the programme is building on Phase 1 achievements, and in sync with other national /international initiatives in RMG sector /beyond? - In what ways, the programme complements the ongoing national efforts?	- Specific programme components that stand out, in terms of complementarity with the other ongoing interventions in the country - Specific programme components that are seeking to address constraints and opportunities in the Bangladeshis context?	- Secondary literature - programme design documents - Key informants	- PD - SL - KII	✓	✓	✓	✓	✓				✓	Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment			
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors		
DESIGN & COHERENCE	Logical /coherent	<ul style="list-style-type: none"> - To what extent, Theory of Change (ToC), strategies, modus-operandi, risk analysis, context analysis is logical and coherent and address relevant priorities/need - In what ways the articulated theory of change is plausible and consistent with the logic of hierarchy of results? Whether assumptions were articulated and analysed? - Whether the design of RMGP II and BWB is realistic? Enquire extent to which the programme, as designed, is practically doable in the Bangladeshi context? Any alternations needed in the programme design to be better aligned with the Bangladeshi context? - To what extent the programme design integrate gender equality in all aspects? 	<ul style="list-style-type: none"> - Examining logic /Practical feasibility of the ToC, strategies deployed to achieve ToC and extent to which modus-operandi have proven to be coherent in the Bangladeshi context - Testing the validity and consistency of the hierarchy of results and assumptions as conceptualised - Number and proportion of interventions targeting women and girls as per the programme design documents 	<ul style="list-style-type: none"> - programme design documents - Key informants 	<ul style="list-style-type: none"> - PD - KILs 											Analysis of quanti data and quali perspectives from programme documents and KILs to distil findings and conclusions	
						✓		✓	✓							✓	

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants									Analysis and assessment	
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners	Donors		
	Adaptations	- To what extent new factors (other donor assisted programmes, or new policies etc.) are accounted for and any LFA revisions improved the programme logic?	- Instances of adaptations in design and implementation carried out over RMGP II phase and in BWB - Instances of original assumption proving invalid and revising assumptions based on a new reality - Instances of tailoring programme strategies /programme model	Key informants	KII		✓	✓	✓					✓	✓	Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions
	Leverage	- To what extent programme design leveraged partnerships and synergies with other initiatives? And what are the ways to maximize these synergies and partnerships? - What are the new factors /actors impairing /enhancing performance	- Instances of design leverage and how these can be improved - Examples of new factors /actors that have impacted (positively or negatively) the programme	Key informants	KII		✓	✓	✓					✓	✓	Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment		
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors	
EFFICIENCY	Efficient and strategic resource allocations, including gender budgeting	<ul style="list-style-type: none"> - How strategically resources (funds, human resources, time, expertise, etc.) been allocated across four strategic areas and for gender objectives, to achieve better outcomes? - Whether programme Leveraged synergies and partnerships with BWB, other ILO programmes, constituents, other donors, Government, UN, and social partners, etc.? 	<ul style="list-style-type: none"> - Financial allocations of programme budgets across strategic areas - activities, outputs, and outcomes - Cost sharing data with other ILO and non-ILO interventions - Instances of leverage and how it helped the programme in synergistic implementation, while improving efficiencies 	<ul style="list-style-type: none"> - RMGP/II and BWB financial datasets - Key informants 	<ul style="list-style-type: none"> - PD - KIIs 											Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions
	Cost-benefit /value for money	<p>EQ8a: What is the impact of RMGP interventions versus value for money.</p> <p>Sub-questions: What does the cost-benefit /value for money analysis indicate?</p>	<ul style="list-style-type: none"> - Disaggregated budgets for analysing costs and benefits of interventions, for conducting an indicative value for money analysis 	<ul style="list-style-type: none"> - programme financial data, activity wise - Key informants 	<ul style="list-style-type: none"> - PD - KIIs 											Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-Aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment	
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors
EFFECTIVENESS	Effective programme performance (target vs. achievements)	Sub-questions: Did the programme succeed in achieving the development objective and outcomes? Were targets reached? Specifically, a) remediation targets, building safety targets in NI factories, b) strengthened enforcement capacity and effective and equitable labour inspection system, c) improve the DIFE's business process and regulatory capability, d) to improve OSH in policy and practice, e) programme contributed to increasing compliance and productivity at enterprise level in the targeted factories	- Disaggregated achievements (plan Vs. actuals) of outputs and outcomes - Reasons for variance if any	- programme reports, including mid-term review report - Key informants	- PD - KILs - FGDs		✓	✓	✓	✓	✓		✓	✓	Analysis of quanti data and quali perspectives from programme documents and KILs to distil findings and conclusions
	Effective stakeholders participation and contribution	EQ1b: To assess effectiveness of the programme considering the changing context of the programmes Sub-questions: - To what extent has the programme management been participatory and has the participation contributed towards achievement of the programme objectives? - To what extent, stakeholder /partners fulfilled their designated roles	- Instances and citations of stakeholders involvements in different stages of programme design and execution - Instances /specific contributions and effectiveness of social partner - Any missed opportunities in here in terms of engaging stakeholders	- programme progress reports - Key informants	- PD - KILs - FGDs		✓	✓	✓	✓	✓		✓	✓	Analysis of quanti data and quali perspectives from programme documents and KILs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment	
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors
	Effective execution of programme strategies	EQ2: Informing the ILO whether the current programme strategy of both programmes is valid. To what extent, the recommendations of the midterm independent evaluation has been taking into consideration EQ5: To assess complementarity and the effectiveness of the collaboration between the different programmes in the sector and provide recommendations on what could be improved and how. Sub-questions: - To what extent programme addressed capacity needs and challenges incl. enforcement capacity; improving power relations and women empowerment?	- Specific capacity building inputs provided by the programme to Government and other social partners - Specific benefits and results of strengthened capacity of Govt and social partners - Specific achievements and gaps in enforcement capacity, improving power relations and women empowerment? What affected (positively /negatively) strategy execution - Action taken on the mid-term review	- programme progress reports containing data related to programme strategy implementation - Key informants	- Review of programme progress reports - KIs	✓	✓	✓	✓	✓	✓		✓		Analysis of quanti data and quali perspectives from programme documents and KIs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment	
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors
IMPACT	Sectoral and regulatory	<p>EQ3a: To assess the long term changes and impact of the programme</p> <p>EQ9: To assess how the programmatic interventions and achieved outcomes have influenced the national priorities in the area of trade, socioeconomic development.</p> <p>EQ10: To assess how the programme contributed towards better preparation of the country for smooth transition in the upcoming development trajectory in post LDC graduation</p> <p>Sub-questions: Whether the RMG sector have become more compliant, competitive, and forward looking; whether overall industrial safety in the sector have improved; whether regulatory environment, governance systems and mechanisms have been strengthened?</p>	Instances and citations on benefits generated by the programme, in terms of sectoral and regulatory changes	- programme progress reports - Key informants	- PD - Kils										Analysis of quanti data and quali perspectives from programme documents and Kils to distil findings and conclusions
						✓	✓	✓	✓	✓			✓	✓	

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants									Analysis and assessment
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners	Donors	
	Enterprise, social partners, and workers	To what extent RMG workers (including women workers) have achieved safe and decent working conditions; and what have been the gains for enterprises and social partners in terms of improved systems and mechanisms leading to improved productivity?	Instances and citations on benefits generated by the programme, for enterprises, social partners, and workers, highlighting benefits for women workers, if any	- programme progress reports - Key informants	- PD - KIIs - FGDs	✓	✓	✓	✓	✓	✓		✓	✓	Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions
	Unintended outcomes (positive or negative)	What positive or negative unintended outcomes can be identified?	Instances and examples of outcomes witnessed which were unintended	Key informants	KIIs	✓	✓	✓	✓	✓	✓		✓	✓	Analysis of quanti data and quali perspectives from programme documents and KIIs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment		
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors	
SUSTAINABILITY	Mechanisms	EQ3b: To assess sustainability and whether it can be linked with phase one (2013-2017) and to what extent EQ7: To assess any change (institutional /operational etc.) within the GOB agencies e.g., DIFE, ISU Industrial Safety Unit/ ministries as well as other actors that this programme aims to influence. EQ11: To assess systemic changes elicited by the programme(s), intended or otherwise Sub-questions: What is the likelihood of interventions continuing beyond the life of the programme? Will benefits produced by the programme continue?	Specific examples of mechanisms that can act as 'sustaining' force for continuation of programme benefits	- Key informants - Relevant documents if available	- PD - Kils											Analysis of quanti data and quali perspectives from programme documents and KILs to distil findings and conclusions
	Momentum	To what extent can we expect continuation of results achieved; and what is the likelihood of scaling up and replication by Govt, partners and stakeholders?	Instances /examples of ongoing or planned efforts to ensure continuance and scale up of programme interventions and results by different entities (Govt, partners and other stakeholders)	- Key informants - Relevant donor strategy document if available	- PD - SL, including media reports - Kils											Analysis of quanti data and quali perspectives from programme documents and KILs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment		
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors	
MANAGEMENT ARRANGEMENT, CROSS-CUTTING ISSUES AND LESSONS LEARNT	Governance and staffing structures	EQ8b: To assess level of effectiveness of the management /Gov arrangements? Sub-questions: Was mgt and governance arrangement adequate and involved tripartite constituents? How does the programme's governance structure facilitate good results and efficient delivery? What can be learned for efficiency gains?	- Instances and examples of 'Fit-for-purpose' nature of management and governance arrangement - Level of representatives of the governing and management structure regarding its effectiveness and what could have been done better /missed opportunities	- programme and governing board meeting minutes - Key informants	- PD - Kils		✓	✓	✓							Analysis of quanti data and quali perspectives from programme documents and Kils to distil findings and conclusions
	Skills and partnerships, role divisions	Did the programme have adequate technical skills and partnerships, with gender expertise? How clear is the understanding of roles and responsibilities and division of labour between programme's staff, partners, and government entities?	- Matching of skills and experiences of the social partners to deliver the programme components effectively - Instances of mismatch /missed opportunities /challenges in terms of collaborating with social partners - Instances of satisfaction /dissatisfaction with division of labour and work allocations between programme staff, partners and govt entities; any missed opportunities	- programme and governing board meeting minutes - Key informants	- PD - Kils		✓	✓	✓							Analysis of quanti data and quali perspectives from programme documents and Kils to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment		
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors	
	Systems for assessing performance and impact, risk management	How effectively does the programme's management team monitor the programme's performances and results? Does the programme report on progress in a regular and systematic manner, both at regional and global levels, and to social partners and donors? What M&E system has been put in place, and how effective has it been? Does the M&E system provide for capturing results in terms of participation of women's and people with disabilities?	- programme teams' self-assessment of the M&E framework and systems deployed in the programme, including what challenges and information gaps were witnessed, and what more could have been done - Evaluator's assessment of the M&E system	- programme documents - Key informants	- Review of programme documents - KIs	✓	✓	✓								Analysis of quanti data and quali perspectives from programme documents and KIs to distil findings and conclusions
	Adaptiveness in execution	- How adaptive have the entire programme management been? Whether and how course corrections been carried out? - What path corrections with regard to Covid-19 led disruptions	- Instances and examples of adaptive programme management and gaps therein, also analysing Covid-19 related disruptions and programme response	- programme documents - Key informants	- PD - KIs - FGD	✓	✓	✓	✓	✓	✓		✓	✓		Analysis of quanti data and quali perspectives from programme documents and KIs to distil findings and conclusions

Evaluation aspect (as per OECD /DAC criteria)	Sub-aspect	Evaluation questions /sub questions	Measure (s) or indicator (s)	Data sources	Data collection method	Stakeholders /informants								Analysis and assessment	
						PSC	Govt.	ILO team	Employer Org'n	Workers Org'n	Factories & workers	Brands	Partners		Donors
	Cross-cutting issues, lessons learnt and best practices	EQ4: Independently assessing the contribution of RMGP-II and BWB to gender equality, non-discrimination, social justice, and environmental sustainability EQ6: Identifying good practices and lessons learned across different strategic areas of the programme and how this can contribute to learning and knowledge development of the two programmes and their stakeholders. Sub-questions: What were facilitating or constraining factors for achieving outcomes and objectives?	- Instances /specific examples of cross cutting issues being addressed - Best practices observed - Examples of facilitating or constraining factors to making programme effective and impactful - Challenges and missed opportunities in dissemination and communication about the programme	- programme documents - Key informants	- Review of programme documents - KIs - FGDs	✓	✓	✓	✓	✓	✓		✓	✓	Analysis of quanti data and quali perspectives from programme documents and KIs to distil findings and conclusions

Annex 2: Evaluation framework Vs. OECD-DAC criteria and questions of the evaluation TOR

Evaluation framework Vs. OECD-DAC criteria and questions of the evaluation TOR			
OECD-DAC Criteria	EQ Number	Specific evaluation question	Addressed by EQM assessment cluster
Relevance	1	To what extent and how well has the programme responded to the needs and priorities of the national stakeholders, GoB and social partners, and beneficiaries in the RMG sector including COVID-19 response and recovery and to the post COVID-19 related challenges facing RMG industry?	Context responsive
Relevance	2	Does the programme align or is consistent with ILO's mainstreaming strategy on gender equality. To what extent has the programme strategies and approaches been pertinent to stakeholders' (MOLE/DIFE, BFSCD, employers' and workers' organizations) requirements and policies of partners and donors and the needs of RMG sector in Bangladesh, considering the changes in context (e.g., COVID-19's socio-economic impact, the closure of the Accord and Alliance and the creation of two local initiatives, and etc.)?	Context alignment and complementary
	3	Have the programme strategies been responsive to changes in the business, socio-economic, political, and institutional environment (e.g., the departure of the Accord and Alliance and whether it will affect RMG sector and BWB)?	Context responsive
Design	4	To what extent are the programme designs (objectives, outcomes, outputs, and activities) and their underlining theory of change, its strategies, modus-operandi, risk analysis, context analysis logical and coherent and address relevant priorities/need?	Logical /coherent
	5	• Did the project design consider the gender dimension of the planned interventions through objectives, outcomes, outputs, and activities that aim to promote gender equality and non-discrimination? Is the programme strategy adapted to the identified needs and capacities of female and male partners and beneficiaries and those of people with disabilities?	Logical /coherent
	6	Were there any major changes in the logical framework? If yes, why? How effective were these changes in improving the programme logic?	Adaptations
Coherence	7	To what extent has the programme leveraged synergies and partnerships (with BWB and other ILO programs/projects, constituents, other donors, Government, social partners, national institutions, and other UN/development agencies) to enhance the projects' effectiveness and impact and maximize its contribution to Bangladesh's priority of "improved working conditions in the RMG sector"? Are there any ways to make the intervention more efficient and effective?	Leverage
	8	Have there been new intervening factors/actors (e.g., other donor assisted programmes, or new policies or other interventions) that have emerged, which may have impaired or enhanced programme performance or future ILO development assistance in these strategic areas?	Coherence

Evaluation framework Vs. OECD-DAC criteria and questions of the evaluation TOR			
OECD-DAC Criteria	EQ Number	Specific evaluation question	Addressed by EQM assessment cluster
	9	What are the ways to maximize synergies and improve collaboration with these new actors? Also explore possible duplication of effort/resources?	Leverage
Effectiveness	10	Assess the extent to which the programme achieved its intended outcomes and objectives? o to what extent and how has the programme met the remediation targets and support the remediation work of NI factories? To what extent has these ensured building safety in the targeted NI factories? (SA1, outcome 1)o How has the programme strengthened enforcement capacity and effective and equitable labour inspection system? To what extent have the regulation of industrial safety by the GOB become more effective, as a result of the programme intervention? (SA 2, outcome 2)o How has the programme contributed to improve the DIFE's business process and regulatory capability to regulate industrial safety through enforcement of labour law and advisory services to employers and workers? How effective has DIFE become in regulating industrial safety of the RMG, through the support of the programme? (SA 2, outcome 3)o How has the programme contributed to improve OSH in policy and practice? To what extent has the occupational safety and health practices been improved as a result of the programme intervention? To what extent has a culture of occupational safety and health been established in the sector? (SA 3, outcome 4)o to what extent and how has the programme contributed to increasing compliance and productivity at enterprise level in the targeted factories? To what degree have the compliance and productivity at enterprise level in the targeted factories been increased? (SA 4, outcome 5)	Effective programme performance (target vs. achievements)
	11	How effective was the programme at stimulating interest and participation of programme partners at the micro, meso and macro levels? To what extent were the constituents able to fulfil the roles expected in the programme strategies?	Effective stakeholders participation and contribution
	12	To what extent and how well did the programme meet the capacity needs of the constituents and how well did it address capacity challenges (if any, e.g., for employers, workers, and buyers to support and sustain remediation efforts) as well as those challenges related to enforcement capacity? What effects (expected/unexpected) are the interventions likely to have on power relations between women and men, and on women's empowerment?	Effective execution of programme strategies
Efficiency of resource usage	13	How efficiently has the RMGP II been managed in terms of its human / financial resources and organizational / governance structure?	Efficient and strategic resource allocations, including gender budgeting

Evaluation framework Vs. OECD-DAC criteria and questions of the evaluation TOR			
OECD-DAC Criteria	EQ Number	Specific evaluation question	Addressed by EQM assessment cluster
	14	To what extent have the programme leveraged partnerships (with constituents, national institutions, and other UN/development agencies) that maximize the projects' effectiveness and impact on Bangladesh's priority of "improved working conditions in the RMG sector"?	Effective stakeholder participation and contribution
	15	Were resources allocated strategically to achieve the objectives under the four SAs? Were resources (funds, human resources, time, expertise etc.) allocated strategically to achieve gender-related objectives?	Efficient and strategic resource allocations, including gender budgeting
	16	Assess the impact of RMGP interventions versus value for money	Cost-benefit /value for money
Effectiveness of management arrangements	17	To what extent were the technical resources and partnerships adequate and adapted to fulfil the programme plans? Does the management team have adequate gender expertise?	Adequate skills and partnerships, with gender expertise
	18	Were the management and governance arrangements of the programme adequate? Does the project have an M&E system in place that collects sex-disaggregated data and monitors gender-related results?	Adequate management and governance
	19	Were institutional arrangements with partners and the role of tripartite constituents appropriate and effective?	Adequate management and governance
	20	Identify factors that facilitated, or challenges that obstructed the programme from achieving its results, outcomes, and objectives. Have these factors been sufficiently analysed and adequately addressed in programme intervention?	Systems for assessing performance and impact
	21	To what extent and how had the programme management been adaptive ? To what extent has these adaptive management contributed to maximize the opportunities to achieve the intended outcomes and objective?	Adaptive management
Impact	22	To what extent has the RMG sector become a more compliant, competitive, and forward-looking industry through the changes that have been enhanced with the support by the programme (e.g., strengthened regulatory environment and governance systems and mechanisms at national and enterprise levels , compliance to international labour standards)?	Sectoral and Regulatory

Evaluation framework Vs. OECD-DAC criteria and questions of the evaluation TOR			
OECD-DAC Criteria	EQ Number	Specific evaluation question	Addressed by EQM assessment cluster
	23	To what extent has the overall industrial safety and safe and decent working conditions been generated in the RMG sector? How this can be linked with the programme?	Workers
	24	How have the programmatic interventions and achieved outcomes influenced the national priorities in the area of trade (RMG share), socioeconomic development? What are the possible long-term effects on gender equality?	Sectoral and Regulatory
	25	To what extent has the RMGP II contributed to accelerating the SDGs at the national level? Have the programme initiatives made a difference to specific higher goals to which they are linked (i.e., social, environmental, and economic effects of the intervention)? If so, how?	Sectoral and Regulatory
	26	To what extent and how had the programme contributed towards better preparation of the country for smooth transition in the upcoming development trajectory in post LDC graduation?	Sectoral and Regulatory
	27	Has the programme generated any unintended (both positive and negative) effects?	Unintended
Sustainability	28	To what extent has the programme had impact on institutional and systemic changes (including improved inter-agency coordination) necessary for sustainable improvements in industrial safety and safe and decent work in Bangladesh?	Mechanisms
	29	To what extent has the RMG II interventions, i.e., remediation efforts, BWB legacy of compliance, and labour governance interventions (i.e., OSS for industrial safety), been institutionalized? What are the results that are likely to be sustained/maintained beyond the RMGP II through the action of Government and other stakeholders, factory partners and social partners and ILO constituents?	Mechanisms
	30	Are there any results that are likely to get scaled up and replicated by the government, partners, and stakeholders?	Momentum
	31	To what extent has the strategies adopted by the RMGP II contributed to sustainability of results? To what extent has the RMGP II supported the long-term buy-in, leadership, commitment, and national ownership by the Government and other relevant stakeholder to fully take over the process of ensuring industrial safety? What were the challenges? How should these challenges be best tackled?	Mechanisms
	32	Analyse stakeholders ownership to continue contributing to the momentum the program has initiated. How has the program contributed to labour law reforms beyond RMG?	Momentum
	33	What are needed to be done in developing a long-term institutional architecture of the industrial safety regulation and enforcement mechanism which is independent, efficient, and credible to protect factories and their workers?	Mechanisms

Evaluation framework Vs. OECD-DAC criteria and questions of the evaluation TOR			
OECD-DAC Criteria	EQ Number	Specific evaluation question	Addressed by EQM assessment cluster
Cross-cutting issues	34	To what extent had the programme mainstreamed OSH and gender in the systems across the RMG sector? To what extent has the RMGP II contributed to improve gender equality, and inclusion and empowerment of women workers in the RMG sector?	Gender
	35	What are other observed gender impacts of the programme (both positive and negative, if any)?	Gender
	36	To what extent has the programme contributed to achieving UNSDCF 2021-2025's relevant outcome, i.e., a more equitable, non-discriminatory, gender-responsive, participatory, accountable governance and social justice? and are there any differential results across groups?	Gender
	37	To what extent social dialogue (including worker/employer dialogue) have been promoted in the design and implementation and achievement of programme results?	ILO normative and tripartite mandate
	38	To what extent has the programme been able to increase the capacity, commitment and motivation of tripartite constituents and committees (e.g., Participation Committees) at the factory and national level to resolve compliance issues? To what extent are the PCs capable to contribute to safe working conditions and respect of labour rights in their respective factories?	ILO normative and tripartite mandate
	39	To what extent has normative and tripartite mandates been promoted to create a regulatory environment in line with International Standards and best practice, and to contribute to driving lasting improvements and encourage inclusive growth?	ILO normative and tripartite mandate
	40	How have the programme address environmental issues and contributed to improve environmental standards and environmental sustainability of the RMG sector?	Environmental sustainability
	41	What are the exemplary achievements and/or particular challenges for achieving policy, legislative and strategic change and buy-in to create an enabling environment for an efficient and effective culture of industrial safety in the country?	Good practices
	42	Document lessons learnt and good practice in regard to capacity development of the social partners	Lessons learnt

Annex 3: List of stakeholders interviewed

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries								
<i>Data collection period: 15 May to 10 June 2023</i>								
S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
1	PSC members	Mr. Md. Ehsane Elahi	Secretary, Ministry of Labour, and Employment	Chairman PSC and Secretary, MoLE		23 May 2023		2-3 PM
2	PSC members	Md. Nasir Uddin Ahmed	Inspector General, Department of Inspection for Factories and Establishments	Member	1. Mina Masud Uzzaman, Additional IG, HQ 2. Farid Ahmed, Joint IG (current), HQ 3. Abdul Mumin DIG (POCD), HQ 4. Shuly Aktar DIG (Safety), HQ 5. Abdul Awal, AIG Safety, HQ 6. Tammin Haque, AIG Safety, HQ 7. Md. Akid Ul Hasan, AIG Safety, HQ 8. Md. Rashedul Alam, Labour Inspector, HQ 9. Sumon Kumar Bhattacharya –FO DIFE RMGP	24 May 2023		2.30 PM
3	PSC members	Mahabubul Hoque	Representative of RAJUK	Member	Borhan Uddin	04 June 2023		2-3 PM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
4	PSC members		Additional/Joint Secretary (IO.) & National Project Coordinator (NPC), Ministry of Labour and Employment	Member		23 May 2023		2-3 pm
5	PSC members	Mr Md. Humayun Kabir	Joint Secretary (Dev.) Ministry of Labour and Employment	Joint Secretary International Organization and PSC Member		23 May 2023		2-3 pm
6	PSC members	Tuomo Poutiainen	Director, ILO Country Office for Bangladesh	Member and ILO Country Director		21 May 2023	11 April 2023; 29 May 2023	9-10 AM
7	PSC members	Mr. Farooq Ahmed/Santoash	Representative of Bangladesh Employers Federation (BEF)	Sec general and PSC member	1. Santosh Kumar Dutta, Deputy Secretary General 2. Md. Saidul Islam, Additional Secretary General 3. Muhammad Habibur Rahman, Senior Legal Officer 4. Joha Jamilur Rahman, Senior Training Coordinator	24 May 2023		10.00 AM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
8	PSC members	Mr. Mohammad Hatem	Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA)	Executive President BKMEA and PSC member	Farzana Sharmin Joint Secretary (compliance cell) – coordinator of RMGP II + one other BKMEA staff	25 May 2023		11:00 AM
9	PSC members	China Rahman	IndustrialAll Bangladesh (IBC)			27 May 2023		3-4 PM
10	Donors	Ms Tanzila Tajreen	Ministry of Foreign Affairs, Netherlands	Sr Policy Advisor, private sector development		30 May 2023		10-11.30 AM
11	Donors	Mr Feroz Iqbal Faruque	Global Affairs Canada	Public Finance Advisor		28 May 2023		2.30 - 4.30 PM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
12	Donors	Ms Afsana Islam	UK	Private Sector Development Adviser & Deputy Team Leader, Growth and Private Sector Development		She was focal then, not with DFID now		
13	Government	Abdul Mumin	Department of Inspection for Factories and Establishments (DIFE)	DIG		24 May 2023		2.30-4.00 PM
14	Government	Kamrul Hasan	Department of Inspection for Factories and Establishments (DIFE)	Ex DIFE IA Focal/Now with BWB, BWB Enterprise Adviser		22 May 2023		3.30-4.30 PM
15	.	Md Mehedi Hasan	Department of Inspection for Factories and Establishments (DIFE)	Deputy Inspector General (Admin)		24 May 2023		2.30-4.00 PM
16	Government	Shuly Aktar	Department of Inspection for Factories and Establishments (DIFE)	DIG, Safety		24 May 2023		2.30-4.00 PM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
17	Government	Mr. Md. Nasiruddin	Department of Labour (DOL)	Director		not responded		
18	Government	Mr Jibon Krishna Saha Roy	BIDA - Bangladesh Investment Development Authority	Director General (current charge) Investment environment services		16 May 2023		3 -4 PM
19	Government	K. M. Salehuddin	Remediation Coordination Cell	Former Project Director Implementation of CAP for the Factories under RCC		06 June 2023		3.30-4.30 pm
20	Government	Md Mostafa Jamal	CDA System Analyst			22 May 2023		4.30-5.30 pm
21	Employers' Organisation	Mohammad Monower Hossain	Bangladesh Garment Manufacturers and Exporters Association (BGMEA)	Joint Secretary, Research, Development, and Trade Information (RDTI) & Head	Ashraf Wares, AKM Mamunur Rashid			

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
				Sustainability at Brand BGMEA				
22	Employers' Organisation	Mr. Fazle Shamim Ehsan	Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA)	Vice President		25 May 2023		11 AM-12 PM
23	Workers' Organisation	Mr. Naimul Ahsan Jewel	NCCWE	Member Secretary, NCCWE		25 May 2023		3-4 PM
24	ILO	Saidul Islam	ILO Bangladesh	Senior Program Officer		21 May 2023		2-3 pm
25	ILO	Mohammad Nazmul Avi Hossain	ILO Bangladesh	Senior Program Officer		19 May 2023		11 AM-12 PM
26	ILO	Neeran Ramjuthan	ILO Bangladesh	CTA, LabAdmin Cluster		21 May 2023		10-11 AM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
27	ILO	Maurice Len Brooks	ILO Bangladesh	Manager - Improving Working Conditions in the RMG Sector ILO-Dhaka		14 May 2023	11 April 2023; 17 April 2023	3.30 - 4.30 PM
28	ILO	Borhan Uddin	ILO Bangladesh	Programme officer		11 May 2023	11 April 2023	2.30- 3.30 PM
29	ILO	AKM Masum	ILO Bangladesh	Programme officer		15 May 2023		3.30 - 4.30 PM
30	ILO	Md. Ashiqur Rahman Ripon	ILO Bangladesh	Programme officer		14 May 2023		2.30 - 3.30 PM
31	ILO	Satil Mahmud	ILO Bangladesh	Programme officer		11 May 2023		10-11 AM
32	ILO	Shammin Sultana	ILO Bangladesh	Programme officer		15 May 2023		2.30- 3.30 PM
33	ILO	Onchita Shadman	ILO Bangladesh	Communication Officer		declined but shared a list of documents with a mail		
34	ILO	Mokther Hossain	ILO Bangladesh	M&E Officer		11 April 2023	12 April, 21 May 2023, and various other interactions on different days	
35	ILO	Alam Mostofa	ILO Bangladesh	Finance Officer		11 May 2023		3.30 - 4.30 PM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
36	ILO	Mohamad Anis Agung Nugroho	Better Work Bangladesh	CTA		13 April 2023	21 May 2023	11.30 - 12.30 AM
37	ILO	Sayan Md Rafi	Better Work Bangladesh	M&E Officer		13 April 2023		
38	ILO	Zariath Tamanna	Better Work Bangladesh	TL		15 May 2023		12.00- 1.00 PM
39	ILO	Andrew Christian	ILO -Regional /HQ	HQ (LABADMIN OSH)		Declined due to his very limited involvement with projects		
40	ILO	Deborah Schmidiger	ILO -Regional /HQ	Senior Programme & Partnership Officer - BW		16 May 2023		2-3 PM
41	ILO	Yuki Kobayashi	ILO Tokyo-BWB/METI	Programme Coordinator Building Responsible Value Chains in Asia ILO Office for Japan		16 May 2023		2-3 PM
42	Partners	Paul Rigby	NIRAPON	Chief Executive Officer		19 May 2023		2.30 PM -3.30
43	Partners	Mr. Abdul Haque,	RSC	Managing Director	Sefat Ahmed and George Feller	22 May 2023		11 AM- 12 PM

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
44	Partners	Mr Sohel AZAD	Bureau Veritas Bangladesh (BVV)	Country Manager	Tapan Sarkar, Building and Infrastructure specialist	06 June 2023		2.30 PM -3.30
45	Partners	Dr Khondaker Golam Moazzem	Centre for Policy Dialogue (CPD)	Research Director		07 June 2023		7-8 PM
46	Factories and workers	Md. Enamul Haque, Asst. General Manager, Admin HR,&Compliance,	Fullcharm Fashion Knitters Ltd., Plot-1175/1179, Basan Sarak, Vogra, Gazipur sadar, Gazipur		Several factory managers and workers were engaged in the discussions	17 May 2023		10.00 AM
47	Factories and workers	Md. Rubel Mallik- Manager HRD, Alim Knit LTD	Alim Knit (BD) Ltd., Building No.1, Nayapara, Kashimpur, Gazipur		Several factory managers and workers were engaged in the discussions, including 1. Lipi Akhter, Senior Officer, Compliance 2. Toukir Ahmed, Officer, Compliance	18 May 2023		10.00 AM
48	Factories and workers	Nazma Akter, Senior Welfare officer, 18 May, Karim Textile (Purbani) Ltd	Purbani Fashion Ltd., Mouchalk/Noorbagh, Kaliakoir, Gazipur (BWB and RMGP II)		Several factory managers and workers were engaged in the discussions	18 May 2023		2.00 PM
49	Factories and workers		NI factory - Mondol Knitwear Ltd		Several factory managers and workers were engaged in the discussions			

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
50	International Brands		H&M			05 June 2023		10-11 AM
51	International Brands	Tahmina Jesmin	GAP			05 June 2023		3-4 PM
52	Government	Lt Col Zulfiker	BFSCD	Former DG//support gender activities		08 June 2023		3-4 PM
53	Employers' Organisation	Brig General Abu Nayeem Md Shahidullah	FBCCI safety council: The Federation of Bangladesh Chambers of Commerce and Industry		Md Monjur Kadar Khan, Programme coordinator FBCCI safety council Md Shakhawat Hossain, training, and admin officer of safety council Executives, Md Amin, accounts, and finance	23 May 2023		10.30 AM
54	Partners	George faller	RSC Chief Safety Officer	Ex CTA RMGP II		22 May 2023		11-12 PM
55	ILO	Abul Azad, Jamil Ansar	ILO, SDIR project team			30 May 2023		2.30-3.30 PM
56	Workers organisations	Razequazzaman Ratan	Trade union					
57	Other partners	Umme Salma Annie	CARE Bangladesh	Project Officer, Urban Health, Care Bangladesh				

RMGP II Cluster Evaluation - Key Informant Interviews and Focus Group Discussion with selected stakeholders and beneficiaries

Data collection period: 15 May to 10 June 2023

S.No.	Stakeholder type	Name	Organisation	Position	Other key informants who participated in the meeting (name and designation)	Date of meeting	Other dates of second /third meeting as applicable	Time of meeting
58	Partners	DIFE female labour inspector conference			Multiple key informants interviewed	25 May 2023		2-3 PM
59	Other	Shashwata Kasfia Sneho,	Coordinator, Konabari & Ashulia Zirabo Center, Bangladesh Center for Workers Solidarity (BCWS),	Workers Empowerment Project (WEP), Funded by USAID, (tenure: 2017-2023)				

Annex 4: RMGP II programme progress on the results framework

RMGP II progress on the Results framework <i>(Source: Quarterly and Annual Progress Reports RMGP II and evaluation assessment)</i>						
Strategic Area	Outcome	Output	Consolidated achievements (till March 2023)	Disaggregated picture	Key data points (related to output and outcome indicators)	Evaluation remarks
SA1: Ensuring factory safety through remediation	Outcome 1: By the end of 2020, all active factories of the target 1,500 NI factories are remediated	Output 1.1: A remediation coordination cell (RCC) is established	<p>54% original non-compliances remediated in 658 active factories. The reasons being shortage of manpower of DIFE, Covid-19 impact and ineffective application of the escalation process.</p> <p>An industrial safety unit is established under the DIFE to monitor safety in all industries.</p> <p>First industrial safety forum in Bangladesh was organised in May 2022.</p>	<ul style="list-style-type: none"> - CAP completion in Cat1 factories: 79% - Structural NCs are addressed (48% in progress or completed) in relatively more proportions than fire (35%) and electrical (37%) NCs 	<ul style="list-style-type: none"> - 754 factories (of 1549) closed - 658 open or jointly monitored by DIFE, and private initiatives - 13 joined private initiatives - 113 relocated or shifted - 55% factories have achieved less than 50% progress on remediation - Utilisation Declaration of 135 (out of 238 requested by DIFE) factories suspended by BGMEA; 47 closure order issued - ILO handed over 16 types of inspection equipment to DIFE 	<ul style="list-style-type: none"> - Given that overall average of 54% CAP completion progress is driven by good progress achieved in Cat1 factories, progress in Cat 2 and 3 factories is expected to be much lower and is a point of concern, although it is understandable that NI factories have much lesser incentives (no buyers pressure e.g.) and resources (financial capacity) for change than RSC and Nirapon factories (where CAP completion is seen at upwards of 90%). - While these initiatives have organically grown and are serving distinct segment of supply chain factories for international buyers, there is some implicit competitive pressures among the private sector initiatives (RSG, Nirapan, BW) in terms of acquisition of factories, especially those which have multiple buyers - Initiatives are operating on a compliance spectrum from safety (NI, BIDA), to safety+ (RSC and Nirapan) to social compliance (BW). No initiative is currently working on environmental compliance. It is to be reviewed whether BLR /BLA provide a unified /common code of conduct from where initiatives can select their niche

RMGP II progress on the Results framework

(Source: Quarterly and Annual Progress Reports RMGP II and evaluation assessment)

Strategic Area	Outcome	Output	Consolidated achievements (till March 2023)	Disaggregated picture	Key data points (related to output and outcome indicators)	Evaluation remarks
SA1: Ensuring factory safety through remediation	Outcome 1: By the end of 2020, all active factories of the target 1,500 NI factories are remediated	Output 1.2: Employers, workers and buyers are better equipped to support and sustain remediation efforts	Bengal Institute (BI) for Architecture, Landscapes and Settlements developed a FDG manual and organised a consultation with PWD, BKMEA, BLF, IBC, and others.		- 59% factories submitted detailed remedial designs, of which 18% approved by the RCC task force, delays due to slow response from factories and ongoing transition from RCC to ISU	- Model factory design guidance is a good way to achieve improved structural integrity of existing and new factories. Implementation of this design may require adjustments beyond the NCs being identified for the NI and other factories. As the factories are striving to address existing NCs, achieving new guidance on factory design can at best be a 'medium-term' change that can potentially happen when all factory support initiatives (DIFE-NI, DIFE-FBCCI, BW, Nirapon, RSC) include the new design elements into this code of conduct /audit procedures. - LIMA Remediation Tracking Module (RTM) have data scarcity at the moment. Its potential for effective tracking for RMG and beyond would need to be realised. - RMG wing at DIFE is nascent and can in due source develop synergistic links with RSC, Nirapan and other private initiatives.
SA2: Governance	Outcome 2: Government effectively regulates industrial safety	Output 2.1: One-stop-shop for industrial safety and compliance established and functional	- OSS established and operational. DIFE, CDA, RAJUK, FSCD linked with the national OSS system. - BIDA OSS process simplification through one form for five services for ease of doing business in Bangladesh - FSDC service integrated to BIDA-OSS - Capacity building on cyber security - Industrial Safety Framework agreed with MoLE for tripartite signing		- 60% of licensing by RMG factories are obtained online, including through OSS - In the fiscal year 2021-22 a total 10,568 new licence have been issued from DIFE and the number of renewal licence is 36,796. The data of license processed through LIMA is not received yet.	ILO mandate for RMGP II is about improving governance of industrial safety and in that logic, any support for digitalisation initiatives that improve efficiency of regulation by the Government is justified, as it can in the long-term improve industrial safety. However, this is already part of Digital Compliance /Smart Governance agenda of the Government of Bangladesh. ILO can invest only in select areas which can not be supported by the Government's own budgets.

RMGP II progress on the Results framework

(Source: Quarterly and Annual Progress Reports RMGP II and evaluation assessment)

Strategic Area	Outcome	Output	Consolidated achievements (till March 2023)	Disaggregated picture	Key data points (related to output and outcome indicators)	Evaluation remarks
SA2: Governance	Outcome 3: Effective and equitable labour inspection system in place based on robust performance management, accountability, and a sound gender equality culture	Output 3.1: Labour inspection capacity of DIFE is developed, which is fair, effective and gender sensitive	<ul style="list-style-type: none"> - 24 DIFE Master trainers - ISU (transitioning from RCC) established, with short, medium and long term plan being developed /agreed upon - 387 LIs trained (2-months foundational trainings) through 11 batches - 6 SOPs further updated and being incorporated into a single document - Draft labour inspection policy being developed; strategic compliance plan being prepared - Female LI conference (81 LIs) - Child care centre study (initial steps) taken on implementation of gender road map 	A gender roadmap was developed for DIFE. 120 fire services professionals (18 female) and 237 (29 female) DIFE officials enhanced their knowledge on gender equality.	<ul style="list-style-type: none"> - DIFE compliant management system received 11 complaints in the Jan-March 2023 quarter, and all were resolved - 6 SOPs developed on labour inspection, factory licensing, layout plan approval, accident investigation and complaints Diseases - Operationalization of the Labour Inspection Management Application (LIMA) in all 23 offices of DIFE across the country, resulting in the use of LIMA for all inspections – both proactive and reactive. 	<ul style="list-style-type: none"> - DIFE institutional capacities are getting strengthened through several RMGP II interventions. Translating these capacities into strategic inspection planning and implementation remains a challenge given the enormity of the tasks (RMG and non-RMG), still limited capacities and resources at DIFE. DIFE still looks up to ILO for continued support on capacity building, equipment, and other resources. DIFE budgets (demonstrating Govt commitment) have multiplied over last 10 years, by at least five times. But this is still not adequate (more posts to be sanctioned). - Gender roadmap implementation requires considerably more efforts in the coming years. RSC and ISU engagement links would need to be further developed ensuring synergies.
SA3: Occupational safety and health (OSH)	Outcome 4: OSH improved in policy and practice in a gender inclusive manner	Output 4.1: Framework for national OSH programme initiated in line with national OSH policies of the government	<ul style="list-style-type: none"> - National profile and National Plan of Action (NPA) on occupational safety and health (OSH) are in place - National Plan of Action (NPA) on occupational safety and health (OSH) are in place - National Council for Industrial Health and Safety level discussions on making OSH as Fundamental Rights, SC training manuals, code of conduct for textile and other industries etc. - FBCCI's Master trainers (34) on Safety Committee 			OSH in policy and practice means improvement at all three tiers (Policy, Factory and Workers). While policy and factory level improvements are well evident, there seems to be lack of data on how trained safety committees are more effective than those not trained. More importantly, how safety committees have improved OSH compliances at factory and how awareness and action at worker level have been improved.

RMGP II progress on the Results framework

(Source: Quarterly and Annual Progress Reports RMGP II and evaluation assessment)

Strategic Area	Outcome	Output	Consolidated achievements (till March 2023)	Disaggregated picture	Key data points (related to output and outcome indicators)	Evaluation remarks
			who have so far provided capacity development support to 45 safety committees -			
SA3: Occupational safety and health (OSH)	Outcome 4: OSH improved in policy and practice in a gender inclusive manner	Output 4.2: Stakeholders' capacity and awareness on OSH built in a gender inclusive manner	- Capacity building of trade union and employer representative - The programme with BGMEA and BKMEA trained Master Trainers who will train up 1,000 Trade Union and Safety Committee members from 125 factories.	Two studies on gender: One study was on gender composition in RMG sector and another one was GBV study related to the ILO's C190		BGMEA and BKMEA undertake lot of donors funded projects and therefore move on after completing a particular activity. There is a possibility that after training safety committee, OSH to factory management and owners, there is a very limited follow-on monitoring and support provided to see the process of capacity building leading to practice and behaviour level changes
SA4: Better Work Bangladesh: improving working conditions and productivity	Outcome 5: Better Work factories serve as model for compliance	Output 5.1: Core service delivery model applied	- New factory engagement framework unveiled, transferring ownership to industry stakeholders and BWB taking the role of convener - 321 PCs, 284 SCs formed		- 438 factories were enrolled and active with Better Work Bangladesh, employing 1,273,646 workers, 50% of whom are women - 646,247 workers (56 percent women) elected 3,504 PC representatives. 47% women elected as PC representatives. - DIFE monitoring report on SC indicate that 79% SCs out of 1486 factories operated in accordance with the BLA 2018. - BWB revenue model already shows 56% cost recovery, with assessment report subscription by brand partners standing at 385, with 30 buyers /brands affiliated with BWB	An assessment of functionality and effectiveness of SCs, as per outcome study, indicate a considerable scope for improvement. A detailed assessment of functionality and effectiveness of PCs and trade union would be needed If the BWB becomes the convener, then the structural modalities of delivering the advisory support would drastically change. This is being worked out.

RMGP II progress on the Results framework

(Source: Quarterly and Annual Progress Reports RMGP II and evaluation assessment)

Strategic Area	Outcome	Output	Consolidated achievements <i>(till March 2023)</i>	Disaggregated picture	Key data points <i>(related to output and outcome indicators)</i>	Evaluation remarks
SA4: Better Work Bangladesh: improving working conditions and productivity	Outcome 5: Better Work factories serve as model for compliance	Output 5.2: Engaging stakeholders to contribute to responsible business practices	<ul style="list-style-type: none"> - Better Work Bangladesh, started in 2014, is now working with 441 factories. - Consultations with worker organizations (NCCWE, IBC, ITUC) on new FEF and partnership model, and also consultations with employer organisations to discuss gradual transfer of roles of factory engagement to BGMEA, BKMEA and BEF - This will develop a model of partnership for tailored training & learning for enterprises on different thematic areas like OSH, HR, IR, Management System, and Gender to promote a culture of social compliance and harmonious industrial relations, including Human Rights Due Diligence (HRDD) 		<ul style="list-style-type: none"> - Average NC rate on publicly reported issues is 19.58% - A total of 395 female sewing machine operators had been promoted to supervisory positions in factories - 100% of supervisory training participants were women - ILO RMG Learning Hub initiative, in total 262 Master Trainers have been trained and over 450 RMG factories have so far directly benefitted from their services. - 191 Master Trainers- comprising 30 officials from Department of Labour and 161 from employer and worker organizations- have so far been developed through Learning Hub, on topics including Managing Labour Relations, Covid-19 General Awareness, and Supporting OSH and Infectious Disease Preparedness and Response COVID-19 - 103 factories have been guided to develop maternity rights and breastfeeding policy in line with national laws and international labour standards - research on the preparedness of stakeholders on HRDD and stakeholder consultations - ToTs were conducted on Leadership Skills development for worker representatives (TU & PC). A total of 165 	<p>About 100 factories have active trade unions and rest have participation committees. Trade unions provide better collective bargaining agreements between employers and workers. It is observed by the BW team that trade unions in BW factories is an emerging success story as unions are effective in educating workers about their rights, roles and responsibilities and are able to make their work more comfortable in the factories. Before trade union, BW team observes, there was no culture of compliance. But after trade union, scenario of these factories is totally changed. Workers harassment have considerably reduced and benefits and facilities available to the workers have increased. Though employer have still not changed their attitude towards trade unions in terms of positive role they can play but with time, this is expected to happen as well.</p>

RMGP II progress on the Results framework <i>(Source: Quarterly and Annual Progress Reports RMGP II and evaluation assessment)</i>						
Strategic Area	Outcome	Output	Consolidated achievements <i>(till March 2023)</i>	Disaggregated picture	Key data points <i>(related to output and outcome indicators)</i>	Evaluation remarks
					<p>representatives (82 female, 83 male) from TU, PC, Sexual Harassment Prevention (SHP) and SC of 27 factories were trained over this period. With the overarching objective of strengthening the leadership skills for the worker representative to ensure workers voice, inclusive economic growth, and overall labour management relationship, both males and females were trained on facilitation of a conducive environment at workplace, and raising of their concerns, suggestions, and workplace issues in more structured way to lead a stronger social dialogue mechanism.</p>	

Source: Quarterly and annual progress reports and evaluators assessment

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Annex 6: Terms of Reference

Terms of Reference - Independent Final Cluster Evaluation

Of Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component

ILO Programme Code	<ol style="list-style-type: none"> 1. BGD/16/03/MUL (or BGD/19/05/MUL) Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 2. BGD/22/50/JPN Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component – Bangladesh country component
Country	Bangladesh
P&B Outcome	Outcome 7: Promoting workplace compliance through labour inspection
DWCP Outcome	BGD227: Capacities of labour administration and institutions improved BGD 230, output 1.4 (increased capacity of Member States to improve social dialogue and labour relations laws, processes, and institutions).
Technical field	Labour administration and inspection
Administrative unit	ILO Country Office for Bangladesh
ILO Technical backstopping units	GOVERNANCE
Collaborating ILO Units	DWT /CO New Delhi, RO Asia and the Pacific, LABADMIN/OSH, BETTER WORK, MULTI (Enterprise), ACTRAV, ACT/EMP, LABOURLAW, ITC-TURIN
Time frame	RMGP II - 72 months (01 July 2017 – 30 June 2023) BGD/22/50/JPN - 24 months (01 April 2022 – 31 March 2024)
Budget	BGD/19/05/MUL - USD 22.5 million BGD/22/50/JPN - USD 1,411,556
Funding Agencies	<ol style="list-style-type: none"> (i) Department for International Development (DFID) 6.6 million pounds (US\$8,505,154) (01 July 2017 – 22 Nov 2020) (ii) The Netherlands Ministry for Foreign Trade and Development Cooperation (US\$8,179,474) (01 July 2017 – 30 June 2023) (iii) Department of Foreign Affairs, Trade and Development (DFATD), Canada (Canadian dollars \$10,000,000) (01 July 2017 – 30 June 2023) (iv) Government of Japan/ Ministry of Economy, Trade, and Industry (METI) (US\$ 1.4 million)
Type of Evaluation	Independent
Timing of Evaluation	Final
Evaluation Manager	Ms. Rattanaporn Pongpattana, M&E Officer, ROAP

Introduction and rationale for evaluation

These Terms of Reference (ToR) encompass the final independent evaluation of the following ILO programmes in the ready-made garment (RMG) sector in Bangladesh:

- 1) Improving Working Conditions in Bangladesh's Ready Made Garments sector (2017-23) (BGD/19/05/MUL)
- 2) Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component (2022-2024) (BGD/22/50/JPN)

This final evaluation complies with the 4th ILO Policy Guidelines for Evaluation published in 2020, which requires all programmes/projects with a budget of more than US\$5 million and a duration of more than 30 months to undergo two independent evaluations i.e. midterm and final. The final evaluation will be managed by the M&E Officer based in the ILO Regional Office in Bangkok and will be conducted by a team of independent evaluators (international and national) to be recruited by the evaluation manager. Key stakeholders, including tripartite constituents, donors, key partners, ILO Country Office – Dhaka, technical backstopping unit as well as collaborating ILO Units, will be consulted throughout the evaluation process. The evaluation process and report will follow ILO guidelines and the ILO Evaluation Office will approve the final evaluation report. The evaluation will comply with the United Nations Evaluation Group (UNEG)'s

Evaluation Norms and Standards²⁸.

Per the ILO Evaluation guidelines, the programme required one midterm and one final evaluations, both of which must be independent. The mid-term cluster evaluation was conducted in 2022. This final independent evaluation also takes on a “clustered approach” and covers the ILO development cooperation programmes listed above. This cluster evaluation will allow for more strategic focus and to reduce evaluation fatigue among the key stakeholders²⁹ and will apply a holistic and integrated approach in assessing the performance of the programme against the OECD/DAC evaluation criteria including relevance, coherence efficiency, effectiveness, impact, and sustainability of the programme. The evaluation aims to promote accountability and enhance learning within the ILO and among key stakeholders. The evaluation will apply mixed methods – both qualitative and quantitative. Given the numerous knowledge and M&E products that have been generated both by the RMGP, BWB, and other ILO projects in the RMG sector of Bangladesh, desk review will constitute an integral part of this final evaluation, and the evaluation team will conduct a thorough review of relevant documents and propose possible methods to gather evidence during the field visit in Bangladesh to address the evaluation’s objectives, that include assessment of programmes’ performance based on the OECD/DAC evaluation criteria and other relevant cross-cutting issues, including Gender equality and non-discrimination, promotion of international labour standards, tripartite processes and environmental issues.

This evaluation is planned between March and June 2023, with the final evaluation report expected to be completed by mid of June 2023. The evaluation findings and recommendations will help inform the BWB/METI team in the planning and implementation of the remaining duration of the BGD/22/50/JPN project and will also provide valuable inputs to guide the future direction of ILO’s interventions, at National, Sector and enterprise level in Bangladesh including in the RMG sector and beyond. The M&E Officer, in consultation with the Chief Technical Adviser of RMGP II, the Programme Manager of BWB, and the Operations and Program Support Specialist for the programme, will provide all necessary documents and information required by the evaluation team and will facilitate and support the evaluation team on the logistics needed in the evaluation process.

Background and description of programmes to be evaluated

These Terms of Reference encompass the final independent evaluation of the following ILO programmes in the ready-made garment (RMG) sector in Bangladesh:

- 1) Improving Working Conditions in Bangladesh’s Ready Made Garments sector (RMGP-II, 2017-23) (BGD/19/05/MUL).
- 2) Better Work Bangladesh (BWB), through the implementation of the following component/project
 - BWB (funded through the RMGP-II (SA 4/Outcome 5))
 - The project “Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations” – Bangladesh country component (2022-2024) (BGD/22/50/JPN) (hereinafter referred to as “METI” project)

RMGP II

The RMGP II is a USD 22.5 million programme funded by the Netherlands, Canada, and the UK³⁰, to improve working conditions and safety standards in the Ready-Made Garments (RMG) sector of Bangladesh over the period 2017-2023. It is built on the achievements of the first phase (October 2013 - June 2017) which responded to enhance industrial safety in one of Bangladesh’s leading manufacturing and export sector, following a major industrial accident in 2013 at the Rana Plaza.

The **development objective** of the RMGP II programme is *Safe and decent working conditions contribute to improved competitiveness in the garment and other sectors in Bangladesh.*

Using an integrated approach, the RMGP II was structured along four broad strategic areas (SAs) which are mutually supportive and re-enforcing.

²⁸ <http://www.unevaluation.org/document/detail/1914>

²⁹ Guidance Note 3.3 Strategic clustered evaluations to gather evaluative information more effectively (June 2020) https://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_746718.pdf

³⁰ The original RMGP II worth was \$24.5 million, but the budget was later reduced to 22.5 million since UK left in 2020.

Strategic Area	Outcome
Strategic Area 1: Ensuring factory safety through remediation.	Outcome 1: By the end of 2022, all active factories of the target 1,549 National Initiative (NI) factories ³¹ are remediated
Strategic Area 2: Governance building to effectively regulate industrial safety and support labour inspection reform.	Outcome 2: Government effectively regulates industrial safety
	Outcome 3: Effective and equitable labour inspection system in place based on robust performance management, accountability, and a sound gender equality culture
Strategic Area 3: Improving OSH in both policy and practice, in a gender inclusive manner	Outcome 4: OSH improved in policy and practice in a gender inclusive manner
Strategic Area 4: Expansion of Better Work Bangladesh programme to ensure compliance in at least 400 RMG factories.	Outcome 5: Better Work factories serve as model for compliance

METI project

The Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component (2022-2024) is part of a regional programme implemented in 4 countries including Bangladesh, Cambodia, Vietnam, and Japan. In Bangladesh, the project is overseen by BWB Chief Technical Advisor, who reports to the Country Director, and is managed in conjunction with the on-going Better Work Bangladesh Programme, with the overall coordination of the METI project managed by Programme Coordinator based in ILO-Tokyo.

The project objective is similar to RMGP II in that it aims to (i) improve working conditions (ii) improve the well-being of workers and (iii) support firms in the specified sectors to make improvements in productivity and responsible business practices.

The METI project has three outcomes:

Outcome 1: Enterprises improve social compliance and adapt good labour practices in line with national laws and ILS with social dialogue structure in place.

Outcome 2: Stronger tripartite institutions and collaboration create conducive enabling environment for RBC.

Outcome 3: Providing evidence base and required awareness to help policy discussion.

In Bangladesh, the project plans two outcomes as listed in the table below. While Outcome 1 is backstopped by Better Work, Outcome 2 is backstopped by Better Work and MULTI, with technical advice from ACTRAV and ACTEMP where relevant.

RMGP II's Strategic Area	Outcome
Strategic Area 1: Ensuring factory safety through remediation	
Strategic Area 2: Governance building to effectively regulate industrial safety and support labour inspection reform	
Strategic Area 3: Improving OSH in both policy and practice, in a gender inclusive manner	
Strategic Area 4: Expansion of Better Work Bangladesh programme to ensure compliance in at least 400 RMG factories.	Outcome 1: Based on the business case for good industrial relations, enterprises will improve compliance with national laws and respect the principles of international labour standards and have strong social dialogue structures and processes
	Outcome 2: Stronger tripartite institutions and

³¹ The RMGP II has a special focus on relatively smaller RMG factories which are not covered by industrial safety initiatives, namely Alliance and Accord, supported by European and American apparel retailers. The bottom tier factories, called National Initiative (NI) factories, although not directly contracted by international retailers, exist in large numbers (at last count nearly 700) and employ about 250,000 men and women. The NI factories work on low profit margins and have few incentives for industrial safety, posing significant risk to the lives of their workers and reputational risk for the sector.

	tripartite collaboration at national and international level will create an enabling environment for more productive and sustainable enterprises that implement responsible business practices
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Stakeholders and Partners

Direct stakeholders

- (i) Government of Bangladesh:
 - a) The Ministry of Labour and Employment and its agency responsible for labour inspection, the Department of Inspection for Factories and Establishments (DIFE). Its Industry Safety Unit (ISU) –RMG Wing
 - b) The Ministry of Home Affairs (MOHA) and its agency responsible for fire safety inspection and licensing, the Bangladesh Fire Service and Civil Defence (BFSCD).
 - c) The Ministry of Housing and Public Works (MoHPW), responsible for the Bangladesh Building Code, its Public Works Department (PWD) as well as development authorities responsible for authorizing and inspecting building construction such as: Rajdhani Unnayan Kartripakkha (RAJUK), the Chattogram Development Authority, and other local development authorities.
 - d) National Council for Industrial Health and Safety
- (ii) Employers' organizations
 - a) Bangladesh Employers' Federation (BEF), the national apex employers' organization, representing employers and business associations of all economic sectors of Bangladesh.
 - b) Bangladesh Garment Manufacturers and Exporters Association (BGMEA) and the Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA) are the industry associations that represent factory owners in the garment sector.
 - c) The Federation of Bangladesh Chamber of Commerce (FBCCI)
- (iii) Workers' organizations
 - a) IndustriALL Bangladesh Council (IBC) [for sectoral level collaboration]
 - b) National Coordination Committee for Worker's Education (NCCWE) [for National level collaboration]
- (iv) Factories (RMG), their management and workers, factory safety committees, Participation Committees (PCs)³²
- (v) Garment and retail brands sourcing from Bangladesh

Other collaborating agencies and organizations

- (i) Better Work Bangladesh
- (ii) ILO Learning hub
- (iii) Partners (including BRAC, BSR, CARE Bangladesh, Ethical Trading Initiative, Fair Wear Foundation, Oxfam in Bangladesh, GIZ Bangladesh, Plan International Bangladesh and SNV Bangladesh, Amfori)
- (iv) Bangladesh Bank and private financing institutes (PFIs)
- (v) Bangladesh Investment Development Authority (BIDA) and Bangladesh Economic Zone Authority (BEZA)³³
- (vi) Bangladesh University of Engineering and Technology (BUET)
- (vii) The Center for Policy Development (CPD)
- (viii) Private sector: brands and buyers sourcing from Bangladesh which are working closely with the ILO on issues related to remediation and OSH.

³² Participation Committee (PC) is a legal requirement for establishments which employ fifty or more workers. A PC is a platform for discussion and dialogue between workers and management at factory level, on issues pertaining to working conditions and workplace cooperation. Its membership comprises of management and elected workers' representatives. The functions of the PC include promoting mutual trust and cooperation between workers and employers; ensuring application of labour laws and supporting workers' education and welfare services which have a positive effect on productivity. (Source: "Taking social dialogue to the next level" 12 Dec 2018) https://www.ilo.org/dhaka/Informationresources/Publicinformation/features/WCMS_654366/lang--en/index.htm

³³ both involved in establishing one-stop-shop for streamlining licensing services in the country

- (ix) The Buyers Forum-A consortium of Buyers and Brands sourcing from Bangladesh (led by H&M)
- (x) The IFC, co-implementing GEAR
- (xi) Bureau Veritas Bangladesh (BV) a private engineering agency, contracted to assist the Remediation Coordination Cell (RCC) with case handling, reporting and technical assistance

Ultimate beneficiaries

- (i) The ultimate beneficiaries are, initially workers in the RMG industry, which directly employs some 4.1 million people – of whom approximately 60% are women – and indirectly supports as many as 40 million Bangladeshis (about 25% of the population).
- (ii) Beyond the RMG sector, actions undertaken under RMG-II will further strengthen the capacity of various regulators (e.g., DIFE, BFSCD etc.). This will benefit all other sectors and ultimately large swathes of the Bangladesh work force and their dependents.

Management arrangements and ILO technical backstopping

The implementation of RMGP II is overseen by a Chief Technical Advisor (CTA) for the first three strategic areas (SAs), and a Programme Manager oversees the implementation of BWB (SA 4).

Main programme staffing under the RMGP-II (excluding BWB) consists of a total of 21 positions, of whom four are international (two finished their terms in 2020 and one retired in 2022) and ten national professional officers (two finished in 2019), two programme and one admin assistant, two secretaries and two drivers. The majority of positions were time-limited in the initial design, with only seven positions (two international, two national professional and four support) to be continued after 2020 till 2023. However, due to Covid-19 impacts on the delivery of programme activities, the programme has been continuing with 1 international (though he is funded by another programme of the cluster since June 2022) and 8 national staff without any change in admin and programme support staff.

The BWB programme currently consists of 49 staff members, of whom one is an international professional, 41 are national professional officers, one HR & admin assistant, one finance assistant, one training assistant, two secretaries and two drivers. Initially, other than the Programme Manager, the BWB programme was designed with two additional international professional roles- one of the professionals finished their term in 2017, while the other was transferred in 2021, and replaced by a newly developed National Operations Manager (national professional officer) role.

2.3 Link to National Development Framework and UN and ILO frameworks

The Government's Vision 2021 defines several economic and social outcomes for Bangladesh to achieve by 2021. The Vision and the 8th Five Year Plan (2020-2025) include a major focus on the RMG sector as leader in the export growth strategy. Garment related objectives in the Plan include:

- Fire safety, especially in the garment sector
- Decentralization of garment industries to promote more geographically distributed employment
- Improved environmental standards for the RMG industry
- Addressing gender bias and its impacts on female workers

The programme aligns with the ILO P&B Outcome 7: Promoting workplace compliance through labour inspection and aligns with the UNSDCF 2022-2026 Outcome 4: By 2026, more people, especially the most vulnerable, benefit from more equitable, non-discriminatory, gender-responsive, participatory, accountable governance and justice, in a peaceful and tolerant society governed by the rule of law.

The programme contributes to: SDG 1 (No Poverty), SDG 5 (Gender Equality), SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry Innovation and Infrastructure)

The SDG linkages above subsequently contribute to the ILO Centenary Declaration for the Future of Work, 2019" as follows:

- Strengthened, inclusive and sustainable economic growth, full and productive employment, and decent work for all
- Strengthened capacities of all people to benefit from the opportunities of a changing world of work
- Strengthened institutions of work to ensure adequate protection of all workers

Purpose and scope of the evaluation

Purposes of the final independent evaluation

The main purpose of the independent final evaluation is for improving learning and accountability. The specific focus of the evaluation is as the following:

- 1) To assess relevance and effectiveness of the programme considering the changing context of the programmes e.g., Accord and Alliance leaving and RSC's existence, and other underlying factors beyond ILO's control that affected and might affect the achievement of the programme outputs and outcomes.
- 2) Informing the ILO whether the current programme strategy of both programmes is valid. To what extent, the recommendations of the midterm independent evaluation has been taking into consideration.
- 3) To assess the long-term changes and impact of the programme and its sustainability and whether it can be linked with phase one (2013-2017) and to what extent.
- 4) Independently assessing the contribution of RMGP-II and BWB to gender equality, non-discrimination, social justice, environmental sustainability.
- 5) To assess complementarity and the effectiveness of the collaboration between the different programmes in the sector and provide recommendations on what could be improved and how.
- 6) Identifying good practices and lessons learned that would contribute to learning and knowledge development of the two programmes and their stakeholders.
- 7) To assess any change (institutional/operational etc.) within the GOB agencies e.g., DIFE, ISU-Industrial Safety Unit/ ministries as well as other actors that this programme aims to influence.
- 8) To assess level of effectiveness of the management arrangements and the impact of RMGP interventions versus value for money.
- 9) To assess how the programmatic interventions and achieved outcomes have influenced the national priorities in the area of trade, socioeconomic development.
- 10) To assess how the programme contributed towards better preparation of the country for smooth transition in the upcoming development trajectory in post LDC graduation.
- 11) To assess systemic changes elicited by the programme(s), intended or otherwise

Scope of the evaluation

The final evaluation covers the period starting from July 2017 (start of RMGP II) to June 2023, and will cover the programmes listed in section 2 for its work in the RMG sector. This evaluation will also find out how this phase is built on the first phase (2013-2017) and to what extent the results are linked with each other (from two phases) to generate greater impacts in the RMG sector.

Client

The primary end users of the evaluation findings are the programme management team and the ILO Country Office in Dhaka, the donors, ILO's constituents, ILO technical and collaborating departments and in-country partners and stakeholders.

Evaluation criteria and questions

Below is the list of the evaluation criteria and suggested evaluation questions. It is expected that the final evaluation will address all of the questions detailed below to the extent possible. The evaluators may adapt the evaluation criteria and questions, but any fundamental changes should be agreed upon with the ILO evaluation manager.

Where the evaluation questions (EQ) are not specifically addressing any particular strategic area (SA) component, it is expected that the evaluation team provides equal efforts to gather data necessary to address all of the SA components/projects as listed in Section 2.

Relevance

The extent to which the intervention objectives and design respond to beneficiaries, country, and partners/institution needs, policies, and priorities, and continue to do so if circumstances change.

- To what extent and how well has the programme responded to the needs and priorities of the national stakeholders, GoB and social partners, and beneficiaries in the RMG sector including COVID-19 response and recovery and to the post COVID-19 related challenges facing RMG industry?
- Does the programme align or is consistent with ILO's mainstreaming strategy on gender equality. To what extent has the programme strategies and approaches been pertinent to stakeholders' (MOLE/DIFE, BFSCD, employers' and workers' organizations) requirements and policies of partners and donors and the needs of RMG sector in Bangladesh, considering the changes in context (e.g., COVID-19's socio-economic impact, the closure of the Accord and Alliance and the creation of two local initiatives,³⁴ and etc.)?
- Have the programme strategies been responsive to changes in the business, socio-economic, political, and institutional environment (e.g., the departure of the Accord and Alliance³⁵ and whether it will affect RMG sector and BWB)?

Validity of intervention design

The extent to which the design is logical and coherent.

- To what extent are the programme designs (objectives, outcomes, outputs, and activities) and their underlining theory of change, its strategies, modus-operandi, risk analysis, context analysis logical and coherent and address relevant priorities/need?
- Did the project design consider the gender dimension of the planned interventions through objectives, outcomes, outputs, and activities that aim to promote gender equality and non-discrimination? Is the programme strategy adapted to the identified needs and capacities of female and male partners and beneficiaries and those of people with disabilities?
- Were there any major changes in the logical framework? If yes, why? How effective were these changes in improving the programme logic?

Coherence: How well does the intervention fit?

- To what extent has the programme leveraged synergies and partnerships (with BWB and other ILO programs/projects, constituents, other donors, Government, social partners, national institutions, and other UN/development agencies) to enhance the projects' effectiveness and impact and maximize its contribution to Bangladesh's priority of "improved working conditions in the RMG sector"? Are there any ways to make the intervention more efficient and effective?
- Have there been new intervening factors/actors (e.g., other donor assisted programmes, or new policies or other interventions) that have emerged, which may have impaired or enhanced programme performance or future ILO development assistance in these strategic areas?
- What are the ways to maximize synergies and improve collaboration with these new actors? Also explore possible duplication of effort/resources?

Effectiveness

The extent to which the interventions achieved, or are expected to achieve, its objectives, and its results, including any differential results across groups

- Assess the extent to which the programme achieved its intended outcomes and objectives?
 - To what extent and how has the programme met the remediation targets and support the remediation work of NI factories? To what extent has these ensured building safety in the targeted NI factories? (SA1, outcome 1)

³⁴ Accord on Fire and Building Safety in Bangladesh and the Alliance for Bangladesh Worker Safety were also launched in 2013 to address workplace safety issues. Both initiatives Alliance and Accord, supported by European and American apparel retailers, are now closed, following a directive from the Bangladesh High Court in favour of the RMG sector's desire to replace them with a local initiative. Following the closure of the international brands' initiatives, Accord and Alliance, GoB, RMG factories, and international brands have agreed to replace them with two local initiatives; namely (i) the RMG Sustainability Council (RSC) owned by the sector's industry association, Bangladesh Garments Manufacturers and Exporters Association (BGMEA) and (ii) 'Nirapon' to be managed and run by a not-for-profit local body set up by Alliance.

³⁵ Both initiatives Alliance and Accord, supported by European and American apparel retailers, are now closed, following a directive from the Bangladesh High Court in favour of the RMG sector's desire to replace them with a local initiative.

- How has the programme strengthened enforcement capacity and effective and equitable labour inspection system? To what extent have the regulation of industrial safety by the GOB become more effective, as a result of the programme intervention? (SA 2, outcome 2)
- How has the programme contributed to improve the DIFE's business process and regulatory capability to regulate industrial safety through enforcement of labour law and advisory services to employers and workers? How effective has DIFE become in regulating industrial safety of the RMG, through the support of the programme? (SA 2, outcome 3)
- How has the programme contributed to improve OSH in policy and practice? To what extent has the occupational safety and health practices been improved as a result of the programme intervention? To what extent has a culture of occupational safety and health been established in the sector? (SA 3, outcome 4)
- To what extent and how has the programme contributed to increasing compliance and productivity at enterprise level in the targeted factories? To what degree have the compliance and productivity at enterprise level in the targeted factories been increased? (SA 4, outcome 5)
- How effective was the programme at stimulating interest and participation of programme partners at the micro, meso and macro levels? To what extent were the constituents able to fulfil the roles expected in the programme strategies?
- To what extent and how well did the programme meet the capacity needs of the constituents and how well did it address capacity challenges (if any, e.g., for employers, workers, and buyers to support and sustain remediation efforts) as well as those challenges related to enforcement capacity? What effects (expected/unexpected) are the interventions likely to have on power relations between women and men, and on women's empowerment?

4.5 Efficiency of resource usage

The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way given the impacts of COVID-19 during the major intervention period.

- How efficiently has the RMGP II been managed in terms of its human / financial resources and organizational / governance structure?
- To what extent have the programme leveraged partnerships (with constituents, national institutions, and other UN/development agencies) that maximize the projects' effectiveness and impact on Bangladesh's priority of "improved working conditions in the RMG sector"?
- Were resources allocated strategically to achieve the objectives under the four SAs? Were resources (funds, human resources, time, expertise etc.) allocated strategically to achieve gender-related objectives?
- Assess the impact of RMGP interventions versus value for money.

4.6 Effectiveness of management arrangements

The extent to which the management capacities and arrangements were put in place to support the achievement of results.

- To what extent were the technical resources and partnerships adequate and adapted to fulfil the programme plans? Does the management team have adequate gender expertise?
- Were the management and governance arrangements of the programme adequate? Does the project have an M&E system in place that collects sex-disaggregated data and monitors gender-related results?
- Were institutional arrangements with partners and the role of tripartite constituents appropriate and effective?
- Identify factors that facilitated, or challenges that obstructed the programme from achieving its results, outcomes, and objectives. Have these factors been sufficiently analysed and adequately addressed in programme intervention?
- To what extent and how had the programme management been adaptive? To what extent has these adaptive management contributed to maximize the opportunities to achieve the intended outcomes and objective?

4.7 Impact

The extent to which the intervention has generated or is expected to generate significant positive or negative, intended, or unintended, higher-level effect.

- To what extent has the RMG sector become a more compliant, competitive, and forward-looking industry through the changes that have been enhanced with the support by the programme (e.g., strengthened regulatory environment and governance systems and mechanisms at national and enterprise levels, compliance to international labour standards)?
- To what extent has the overall industrial safety *and safe and decent working conditions been generated in the RMG sector?* How this can be linked with the programme?
- How have the programmatic interventions and achieved outcomes influenced the national priorities in the area of trade (RMG share), socioeconomic development? What are the possible long-term effects on gender equality?
- To what extent has the RMGP II contributed to accelerating the SDGs at the national level? Have the programme initiatives made a difference to specific higher goals to which they are linked (i.e., social, environmental, and economic effects of the intervention)? If so, how?
- To what extent and how had the programme contributed towards better preparation of the country for smooth transition in the upcoming development trajectory in post LDC graduation?
- Has the programme generated any unintended (both positive and negative) effects?
-

Sustainability

The extent to which the net benefits of the intervention continue or are likely to continue.

- To what extent has the programme had impact on institutional and systemic changes (including improved inter-agency coordination) necessary for sustainable improvements in industrial safety and safe and decent work in Bangladesh?
- To what extent has the RMG II interventions, i.e., remediation efforts, BWB legacy of compliance, and labour governance interventions (i.e., OSS for industrial safety), been institutionalized? What are the results that are likely to be sustained/maintained beyond the RMGP II through the action of Government and other stakeholders, factory partners and social partners and ILO constituents?
- Are there any results that are likely to get scaled up and replicated by the government, partners, and stakeholders?
- To what extent have the strategies adopted by the RMGP II contributed to sustainability of results? To what extent has the RMGP II supported the long-term buy-in, leadership, commitment, and national ownership by the Government and other relevant stakeholders to fully take over the process of ensuring industrial safety? What were the challenges? How should these challenges be best tackled?
- Analyse stakeholders ownership to continue contributing to the momentum the program has initiated. How has the program contributed to labour law reforms beyond RMG?
- What are needed to be done in developing a long-term institutional architecture of the industrial safety regulation and enforcement mechanism which is independent, efficient, and credible to protect factories and their workers?

4.9 Cross-cutting issues (Gender equality, social dialogue, normative mandate, tripartism, environmental sustainability and women worker empowerment)

Gender and inclusiveness

- To what extent had the programme mainstreamed OSH and gender in the systems across the RMG sector? To what extent has the RMGP II contributed to improve gender equality, and inclusion and empowerment of women workers in the RMG sector?
- What are other observed gender impacts of the programme (both positive and negative, if any)?
- To what extent has the programme contributed to achieving UNSDCF 2021-2025's relevant outcome, i.e., a more equitable, non-discriminatory, gender-responsive, participatory, accountable governance and social justice? and are there any differential results across groups?

ILO's Normative and tripartite mandate

- To what extent social dialogue (including worker/employer dialogue) have been promoted in the design and implementation and achievement of programme results?
- To what extent has the programme been able to increase the capacity, commitment and motivation of tripartite constituents and committees (e.g., Participation Committees) at the factory and national level to resolve compliance issues? To what extent are the PCs capable to contribute to safe working conditions and respect of labour rights in their respective factories?

- To what extent has normative and tripartite mandates been promoted to create a regulatory environment in line with International Standards and best practice, and to contribute to driving lasting improvements and encourage inclusive growth?

Environmental sustainability

- How have the programme address environmental issues and contributed to improve environmental standards and environmental sustainability of the RMG sector?

4.10 Lessons Learned and good practices

- What are the exemplary achievements and/or particular challenges for achieving policy, legislative and strategic change and buy-in to create an enabling environment for an efficient and effective culture of industrial safety in the country?
- Document lessons learnt and good practice in regard to capacity development of the social partners

Methodology

- The evaluation will comply with evaluation norms, standards and follow ethical safeguards, as specified in the ILO's evaluation procedures. The ILO adheres to the United Nations system of evaluation norms and standards as well as to the **OECD/DAC Evaluation Quality Standards**.
- The evaluation will be conducted by a team of independent evaluators (international and national), who will primarily focus on all the criteria described in section 4 as well as will provide inputs that will feed into the remaining programme period.
- In particular, the gender dimension will be considered as a cross-cutting concern throughout the methodology, deliverables, and final report. The evaluation should involve both men and women in the consultation, evaluation analysis and evaluation team as well as an assessment of the implementation of the program's Gender Strategy and its accompanying Gender Action Plan. Moreover, the evaluators should review data and information that is disaggregated by sex and gender and assess the relevance and effectiveness of gender-related strategies and outcomes to improve the lives of women and men. All this information should be accurately included in the inception report and evaluation report.
- To get a complete understanding and opinion of the relevant stakeholders on RMGP II and BWB/METI's achievements, the evaluation will primarily use a qualitative method of research. This qualitative method will use a mix of desk review of relevant reports and data related to the RMG programme³⁶ and interactions with stakeholders in the field (series of meetings and interviews).
- Quantitative surveys with stakeholders may be conducted (with small sample sizes) to address relevant evaluation questions.
- Cost benefit analysis may be carried out to assess the impact of RMGP interventions versus value for money.
- The evaluation team will examine the intervention's Theory of Change, specifically in light of the logical connect between levels of results and their alignment with the two programs and with the ILO's strategic objectives and outcomes at the global and national levels, as well as with the relevant SDGs and related targets.
- The evaluators will conduct face-to-face semi-structured interviews (or via Skype when necessary) with ILO officials, donors, and constituents in Bangladesh during a three weeklong field mission from **30 April 2023 to 25 May 2023**. The stakeholders to be interviewed will include all of the implementing partners and other stakeholders as has been detailed out in Section 2.1 above and all the clients of the evaluation.

³⁶ Here is a list of M&E products of the RMGP programme and other relevant ILO projects which will be shared with evaluation team when they are on board:

- Log frames (Original version May 2019; 1st revised version May 2021 (after the 2020 RMGP II MTE and 2020 DFID annual review))
- DFID Annual review 2020
- RMGP II Baseline study report
- RMGP II Mid Term Independent Evaluation report 2020
- RMGP II Outcome measurement study report 2022
- BGD/15/03/MUL Promoting Social Dialogue and harmonious Industrial Relations in Bangladesh Final Independent Evaluation report 2022.
- BGD/21/01/DIS Better work National Constituents Capacity Building and Joint Learning Plan Final progress report 2022.
- Other technical products produced by the RMGP II (e.g., technical notes, briefing notes, strategies) for each SA.

- A Stakeholders' workshop will be held in Dhaka towards the end of the evaluation mission. The objective of this workshop will be to: 1) present initial evaluation findings; 2) receive feedback and comments. The workshop will be designed to achieve the dual objectives of validating and adjusting the initial findings whilst also serving as a final data collection step. In addition to various stakeholders, the workshop will also be attended by the programme donors.
- Prior to the stakeholders' workshop, a debriefing session should be organized with the two programs and ILO CO Dhaka.
- To enhance the rigor of the evaluation, data collection methods should be triangulated. Considering the variety of views and interests of stakeholders and clients and users of the evaluation, the stakeholders' perspectives will be triangulated for many of the evaluation questions in order to strengthen the credibility and validity of the results. While the review of documents will provide necessary data, interacting with and interviewing a variety of stakeholders should allow for cross-checking the information acquired, and thereby verifying and triangulating the accuracy and validity of data and information. This should be further supplemented with direct observations in the field during interviews as well as during the participation in the stakeholder workshop.
- Key stakeholders will have the opportunity to provide inputs to the evaluation's TORs, participate in the evaluation process, and provide inputs to a draft evaluation report.
- The evaluator may adapt the methodology, but any fundamental changes should be agreed to between the evaluation manager and the evaluator, and reflected in the inception report

Annex 7: Lessons Learned

ILO Lesson Learned Template – Lesson 1

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: A successful sectoral reform model would essentially require a strong collaborative architecture, with a range of initiatives working with a common purpose even though modalities of implementation are different

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>Over the past 10 years and specifically during RMGP II (since 2017), the programme has developed strong collaborations with all the tripartite constituency responsible for the RMG sector. These collaborations are with the Government (Ministry of Labour and Employment, specifically DIFE), Employers Organisations (FBCCI, BGMEA, BKMEA) and Workers Organisations (WRC, trade unions). The programme has established good links with DIFE-NI, RSC, Nirapon and other initiatives, even though each has different modalities of implementation. The programme has also facilitated inter-ministerial linkages among BIDA, DIFE, BFSCD, RAJUK, and CDA, explored interlinkages between existing licensing services provisions and initiated the digitalized OSS for industrial safety. All this, together with the evidence presented in this evaluation report, provide a good indication of a successful reform model in the RMG sector in Bangladesh.</p>
<p>Context and any related preconditions</p>	<p>Rana Plaza and other tragedies in 2013 attracted international attention and damaged the RMG sector's credibility as a safe and socially complaint supplier to international brands in Europe, UK, and USA. This led to a range of commitments and interventions from the GoB and international buyers to support their supply chain factories to become safe and compliant with international labour standards. The ILO programme capitalized on these opportunities to strengthen the collaborative architecture and support evolution of a sectoral reform model.</p>
<p>Targeted users / Beneficiaries</p>	<p>Government, employers, and workers; The beneficiaries are the private industrial establishments themselves, as well as the workers working in these establishments.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>As this was a policy-focused initiative, RMGP II had little scope to stimulate interest and participation among RMG employees and entrepreneurs, and workers' representatives. The Bangladesh Employers Federation (BEF) and the workers' organizations (NCCWE and IBC) were not involved in programme implementation though IndustriAll Bangladesh Council was involved with the BWB's awareness-raising initiatives.</p>
<p>Success / Positive Issues - Causal factors</p>	<p>A culture of collaboration was built in the programme. This was more explicit in developing digitalized OSS for industrial safety, demonstrating the commitment of government ministries and agencies to workplace safety.</p>
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	<p>ILO programme design and implementation should explicitly ensure collaboration with the tripartite stakeholders in programme design, implementation, and monitoring. Clearly, the RMGP experience provides useful lessons for the ILO programme designers and decision makers for any future initiative aiming at sector-wide or country-wide reforms.</p>

ILO Lesson Learned Template – Lesson 2

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: Safety Plus approach has a higher potential for improvement of working conditions in the RMG factories

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>The RMGP over phases I and II saw a range of initiatives such as DIFE-NI, RSC, BWB, Nirapon, BIDA-FBCCI. All prioritised safety standards while some focused on the larger spectrum of social compliance issues e.g., BWB. Clearly there is a need for lessons learning from all these initiatives. Safety+ approach of compliance is likely to generate better results as have been demonstrated by the evidence compiled by this evaluation. The standards pursued by different initiatives can progressively build on the safety+ and social compliance (and subsequently environmental compliance) standards and approach as it is likely to lead to improved competitiveness and brand-value of the RMG sector and country's exports.</p>
<p>Context and any related preconditions</p>	<p>Each initiative developed its own standards and compliance approaches based on requirements of international buyers in terms of audit reports. Each initiative made its own interpretations of the BLA /BLR to align its protocols to these the national laws and regulatory framework. The initiatives operated independently even though the programme initiated some linkages and knowledge sharing through the Industrial Safety Forum in May 2022.</p>
<p>Targeted users / Beneficiaries</p>	<p>All RMG factories, as well as the workers and communities affected by these establishments.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>Differential standards of monitoring are being carried out in the initiatives, especially when the LIMA inspection module and checklists have been institutionalized. DIFE cooperation modalities with RSC and Nirapon have yet not developed fully to take charge of all the safety and social compliance issues in export oriented RMG factories. The other challenges have been a) limited or no sharing of compliance related data by different initiatives, and b) there is no unified system of monitoring among these initiatives.</p>
<p>Success / Positive Issues - Causal factors</p>	<p>Driven by investment promotion, PMO involvement in ensuring safety processes across all sectors in Bangladesh (BIDA and FBCCI assessment of 5200 factories beyond RMG) in a positive success factor.</p>
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	<p>ILO programme designers should learn from these experiences of multiple initiatives in terms of how better linkages and data sharing can be ensured.</p>

ILO Lesson Learned Template – Lesson 3

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: Still a ‘way to go’ in terms of translating enhanced DIFE capacities to achieving impact beyond the RMG sector:

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>In theory, enhancement of DIFE’s human resources and capacities during RMGP II indicates that its impact will go beyond the RMG sector. However, in reality, further expansion and transformation would be needed to allow DIFE to make broader impact beyond the RMG sector. DIFE and its newly created structure of ISU would need further enhanced capacities and continued GoB commitments would be required to improve safety and social compliances in high-risk profile but non-RMG sectors of the country.</p>
<p>Context and any related preconditions</p>	<p>The foremost precondition was that the government was willing to see changes in the DIFE institutional and technical capacity enhanced for effective inspection of factories. Government interests prompted the commitment, collaboration, and active participation of government agencies in regulating industrial safety and establishing an effective labour inspection system. The best practice is expected to be continuing with further technical support in enhancing the DIFE technical and institutional capacity.</p>
<p>Targeted users / Beneficiaries</p>	<p>The target users are policymakers, government officials, and decision-makers involved in industrial governance and regulation, particularly those responsible for DIFE and its operations. The beneficiaries are the private industrial establishments themselves, as well as the workers and communities affected by these establishments. By improving DIFE's capacity and enforcement capabilities, the aim is to ensure regulatory reforms as well as improved enforcements which in turn are expected to improve compliance with regulations, and overall improvement in the industrial safety in different sectors.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>The challenge to ensuring DIFE enhanced role in other sectors is the continued interests of the government and willingness to change the safety culture beyond the RMG sector. The government now perceives well that the decades of investment in promoting workplace safety have to a great extent materialized at least in the RMG sector. Bangladesh has evaded the negative perception of the brands and buyers regarding the state of safety in its supply chain.</p> <p>There are a few legislative constraints; the current legislative landscape may prevent DIFE from applying meaningful sanctions for non-compliance, undermining the organisation's enforcement capabilities. Digitization and effective inspection face implementation due to technological barriers, lack of infrastructure, or resistance to change at the enterprise level.</p> <p>The current manpower of DIFE of the country is yet limited in view of the expanding private sector factories as the DIFE is responsible for inspecting all shops, establishments, and factories in the country, it is unlikely that the institution will be able to inspect all of them. The human resources and capacity of the newly formed safety unit too must be expanded in order to conduct proactive inspections in RGM and other sectors.</p>

<p>Success / Positive Issues - Causal factors</p>	<p>Continued willingness of the GoB: Government has shown a willingness to extend inspection to risk-prone factories beyond RMG.</p> <p>Capacity enhancement: Increasing DIFE's capacity, particularly through the adoption of digitization and effective inspection procedures, can improve monitoring efforts despite limited human resources.</p> <p>Risk-based approach: Prioritizing inspections based on risk and vulnerability allows for better allocation of limited resources, focusing efforts where they are most needed.</p> <p>Strengthened enforcement capabilities: By addressing the challenges related to legislative constraints and implementing measures to strengthen enforcement capabilities, DIFE can enhance its ability to ensure compliance and apply meaningful sanctions.</p> <p>Technical proficiency development: By investing in the technical proficiency of DIFE inspectors on LIMA, including the RTM, the organization can adapt to emerging sectors, effectively regulate new industries, and address evolving challenges.</p>
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	<p>ILO programmatic and administrative support would be needed in continued support to the Government (in particular DIFE) in:</p> <ul style="list-style-type: none"> (a) ensuring commitment, collaboration, and active participation of government agencies in regulating industrial safety and establishing an effective labour inspection system. By addressing the challenges related to legislative constraints and implementing measures to strengthen enforcement capabilities, DIFE can enhance its ability to ensure compliance and apply meaningful sanctions to non-compliances. (b) increasing DIFE's capacity, particularly through the adoption of digitization and effective inspection procedures, can improve monitoring efforts despite limited human resources; LIMA would require further development and promotion in such a way that it can achieve its potential for effective tracking for the RMG sector and beyond. (c) Assisting prioritization of inspections based on risk and vulnerability allows for better allocation of limited resources; and (d) investing in the technical proficiency of DIFE inspectors, the organization can adapt to emerging sectors, effectively regulate new industries, and address evolving challenges.

ILO Lesson Learned Template – Lesson 4

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: Gender mainstreaming and an enabling working environment requires addressing societal attitudes and establishing supportive systems through continuous and consistent advocacy and innovation.

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>The programme's continuous and consistent follow-up, awareness, and advocacy initiatives have generated a significant commitment from DIFE towards gender mainstreaming. As the DIFE GRM is 10 years long-term strategy plan, it is assumed that special attention will be given to creating opportunities and supporting women to undertake leading roles in these sectors. DIFE will expand its efforts to improve social compliance in other priority sectors, building on its success. Efforts will be made to challenge gender stereotypes and promote a positive perception of women's capacity within the country. Through the BWB, the programme initiated many innovations for empowering women workers by protecting the rights of working mothers, with a focus on long-lasting mindset changes factory floors /factory management. through comprehensive awareness campaigns at all levels.</p>
<p>Context and any related preconditions</p>	<p>The programme could make contributions to gender mainstreaming as the DIFE and other constituents within the government displayed positive responses and actively participated in the process. Due to the prevailing enabling situation, it is expected that continued progress on gender mainstreaming will persist, supported by further assistance as needed by the programme in the next phase. It is clear that this agenda is far from being fully achieved and continued efforts are necessary, including sustained awareness programmes, challenging societal attitudes through education and advocacy, and implementing supportive workplace policies and systems.</p>
<p>Targeted users / Beneficiaries</p>	<p>The programme targeted DIFE (and BFSCD) for gender mainstreaming. Other targeted organisations /beneficiaries were private industrial establishments, workers, and communities, with the goal of ensuring safer working conditions and well-being for women and other workers.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>It is perceived (by key informants interviewed) that the female Labour Inspectors (LI) are entrusted with less responsibilities and authority as compared to their male colleagues. Also, female LIs sometimes face stereotypical treatment, red-tapism, expectations that they will also need to participate in corrupt practices as others in the system are engaging in.</p>
<p>Success / Positive Issues - Causal factors</p>	<p>Govt. is actively participating and integrating gender into rules and regulations. DIFE has already made strides in enhancing social compliance within key sectors in Bangladesh. In addition to promoting increased participation, it is essential to place special emphasis on enabling women to assume leadership positions in both government agencies and the private sector. Efforts must be dedicated to fostering a positive mindset regarding the capabilities of women in the country. By empowering women and creating an enabling working environment, the initiative can lead to increased gender equality, improved workplace conditions, and enhanced opportunities for women to thrive and contribute to the workforce.</p>

ILO Administrative Issues (staff, resources, implementation)	<ul style="list-style-type: none">a) Continued support to Government (in particular DIFE)b) increasing DIFE's capacity, particularly through the adoption of Gender Roadmapc) BWB initiatives can enhance the number of covering factories regarding their ongoing innovations related to wellbeing of women workers
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ILO Lesson Learned Template – Lesson 5

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: Risk-profile based strategic inspections, digitalization, and stronger enforcement capabilities are likely to pave the way for DIFE to become more effective in the future

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>Although DIFE's capacity has increased recently, it's crucial to note that the private sector has expanded tremendously as well. In 2019 compared to 2006, there were 33% more private industrial establishments (BBS, 2020). By extending its capacity at the same rate as the sector, DIFE may still find it challenging to keep up with the industry's expansion and fulfill its labour inspection and other roles. Therefore, DIFE's limited capacity, notably in terms of the availability of inspectors, represents a continuing concern. While future efforts to increase DIFE's capacity should still be made, there is a need to concentrate on making the most use of the current resources. Even with limited human resources, it is possible to increase the monitoring system by adopting strategic inspections guided by risk profiling and digitalization. The DIFE should prioritize inspections based on the degree of risk and vulnerability rather than on the industry's size. However, given the current legislative landscape, DIFE is unable to apply meaningful sanctions for non-compliance. Therefore, future initiatives should also focus on strengthening DIFE's enforcement capabilities. To make this work, future efforts should focus on strengthening the technical and digital proficiency of DIFE inspectors.</p>
<p>Context and any related preconditions</p>	<p>The private sector is growing in size and numbers. DIFE is also growing but not at that pace. The relationships of private sector with DIFE would need to evolve and become more conducive to industrial safety in diverse sectors of the country.</p>
<p>Targeted users / Beneficiaries</p>	<p>The target users of these lessons and recommendations are policymakers, government officials, and decision-makers involved in industrial governance and regulation, particularly those responsible for DIFE and its operations. The beneficiaries are the private industrial establishments themselves, as well as the workers and communities affected by these establishments. By improving DIFE's capacity and enforcement capabilities, the aim is to ensure safer working conditions, better compliance with regulations, and overall improvement in the industrial sector's impact on society.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>Limited capacity and resources: The expansion of the private sector has outpaced DIFE's capacity to effectively regulate and monitor all establishments. Insufficient resources, including a shortage of inspectors, contribute to this challenge.</p> <p>Legislative constraints: The current legislative landscape may prevent DIFE from applying meaningful sanctions for non-compliance, undermining the organization's enforcement capabilities.</p> <p>Technological barriers: Digitization and effective inspection procedures may face challenges in implementation due to technological barriers, lack of infrastructure, or resistance to change.</p>

<p>Success / Positive Issues - Causal factors</p>	<p>Capacity enhancement: Increasing DIFE's capacity, particularly through the adoption of digitization and effective inspection procedures, can improve monitoring efforts despite limited human resources.</p> <p>Risk-based approach: Prioritizing inspections based on risk and vulnerability allows for better allocation of limited resources, focusing efforts where they are most needed.</p> <p>Strengthened enforcement capabilities: By addressing the challenges related to legislative constraints and implementing measures to strengthen enforcement capabilities, DIFE can enhance its ability to ensure compliance and apply meaningful sanctions.</p> <p>Technical proficiency development: By investing in the technical proficiency of DIFE inspectors, the organization can adapt to emerging sectors, effectively regulate new industries, and address evolving challenges.</p>
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	

ILO Lesson Learned Template – Lesson 6

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: The long-term success of the ISU relies on the active participation and support of the government, particularly in providing ongoing technical expertise and resources as the programme expands and evolves with the growing business needs

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>A noteworthy accomplishment of the RMGP II is the quick and effective development of ISU. However, the participation and assistance of the government will be essential to ISU's long-term success. ISU will demand more technical know-how and personnels in the future as the business keeps growing. It will be up to the government to continue to support ISU with the needed requirements for ensuring that it succeeds in its mission.</p>
<p>Context and any related preconditions</p>	<p>The need for ISU as a structural intervention emerged during the RMGP II. The programme as an external entity can only support technical capacity development as the rest of the requirements for a successful ISU would need to come from the Government.</p>
<p>Targeted users / Beneficiaries</p>	<p>The target users of these lessons and recommendations are policymakers, government officials, and decision-makers involved in the RMGP or similar government entities. The beneficiaries are government agencies, departments, or programmes that rely on the services provided by the ISU. The broader society may also benefit from the improved efficiency and effectiveness of the government's operations through the ISU.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>Lack of government support: If the government fails to provide the necessary support, including resources, funding, and policy backing, the long-term success of ISU may be at risk. Insufficient technical expertise: Without adequate technical knowledge, the ISU may struggle to meet the evolving demands of the business, hindering its ability to effectively support the RMGP. Limited personnels: As the business grows, the demand for skilled personnels within the ISU may increase. Insufficient availability of qualified personnel can challenge the unit's operations and expansion.</p>
<p>Success / Positive Issues - Causal factors</p>	<p>Quick and effective development: The ability to establish the ISU quickly and effectively indicates the organization's agility and responsiveness, contributing to its overall success.</p> <p>Government support: Ongoing government participation and assistance play a critical role in the sustained success of ISU, ensuring its continued operations and growth.</p> <p>Technical expertise and labour availability: Building and maintaining a team with the necessary technical skills and expertise, combined with sufficient labour resources, enable ISU to meet the evolving needs of the business and effectively support the RMGP.</p> <p>Commitment to sustainability: The government's commitment to providing the required support for ISU demonstrates a long-term vision and dedication to its success, contributing to the unit's sustainability and overall achievements.</p>

ILO Administrative Issues (staff, resources, design, implementation)	
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ILO Lesson Learned Template – Lesson 7

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: Addressing legislative gaps and ratifying conventions such as C190 can further advance country' credentials in international export markets

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>There are still some gaps in the legislative framework for labour rights and safety that need to be filled in order to bring it into compliance with international labour standards (for instance, C190 is still waiting to be ratified). The convention 190 acknowledges that gender-based violence and harassment disproportionately affects women and girls, and recognizing that an inclusive, integrated and gender-responsive approach, which tackles underlying causes and risk factors, including gender stereotypes, multiple and intersecting forms of discrimination, and unequal gender-based power relations, is essential to ending violence and harassment in the world of work. While RMGP II's support has sparked momentum for essential improvements, it is essential for all stakeholders to continue supporting this momentum going forward. This will credibly enhance the country's credentials in international export markets.</p>
<p>Context and any related preconditions</p>	<p>The country's standing in international markets is increasingly dependent on compliance with human rights and international labour standards. This is increasingly becoming more evident with the country's transition from LDC to a Low- and Middle-Income Country when different rules of preferential trade are applied.</p>
<p>Targeted users / Beneficiaries</p>	<p>The target users of these lessons and recommendations are policymakers, legislators, government officials, relevant labour rights organizations and other stakeholders involved in labour rights and safety regulations and advocacy. The beneficiaries include workers, labour unions, and the broader society affected by labour rights and safety issues, as well as organizations working towards upholding and promoting international labour standards.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>Legislative gaps: The presence of gaps in the legislative framework may be due to several factors, such as delays in policy formulation, resistance from specific stakeholders, or a lack of understanding about the importance of international labour standards.</p> <p>Ratification delays: The delay in ratifying international labour standards, such as C190 (Convention concerning the Elimination of Violence and Harassment in the World of Work), could stem from legislative processes, competing priorities, or political challenges.</p> <p>Limited stakeholder support: If stakeholders do not continue to support the momentum for improvement, progress may stagnate, and necessary changes may face obstacles.</p>

<p>Success / Positive Issues - Causal factors</p>	<p>Stakeholder involvement: The active involvement of stakeholders, including the RMGP and other relevant organizations, can contribute to revisions and improvements in the legislative framework.</p> <p>Momentum for change: Initiatives led by stakeholders can create momentum for crucial improvements, raising awareness and pushing for necessary changes in labour rights and safety.</p> <p>Advocacy for international standards: Efforts to align national labour rights and safety frameworks with international labour standards demonstrate a commitment to upholding and promoting global norms and best practices.</p>
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	

ILO Lesson Learned Template – Lesson 8

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: DIFE's helpline service is a much-needed support to workers to raise their grievances but it would need to improve its accessibility, gender sensitivity, and prompt resolution to maintain trust and encourage utilization:

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>The direct helpline service, which DIFE introduced, has made it easier for employees to file grievances, but there are still a number of issues that need to be resolved if the system is to be effective. First, it's crucial to guide a female caller to a female focal point when she dials the helpline since women could feel better at ease discussing delicate topics like harassment and health with a female representative. Second, more awareness and advertising campaigns are required to inform employees about the helpline and its offerings. Last but not least, it is critical to respond to complaints as soon as possible because a slow response may deter employees from using the service.</p>
<p>Context and any related preconditions</p>	<p>There is a slow uptake of DIFE's help line service. The direct helpline service for employees to file grievances would need to recognise gender-specific needs for effective communication. Also, for promoting the help line, resources would be needed for advertising campaigns, and for ensuring that helpline respond to complaints in a timely manner.</p>
<p>Targeted users / Beneficiaries</p>	<p>The target users of these lessons and recommendations are the employees in the industrial sector who may need to file grievances or seek assistance through the helpline service. The beneficiaries are the employees themselves, as they can access a dedicated platform to voice their concerns and seek support. The organization or entity operating the helpline service, such as DIFE, also benefits by promoting a safe and supportive work environment.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>Lack of gender sensitivity: Failing to guide female callers to female focal points may create discomfort and hinder effective communication, reducing the effectiveness of the helpline in addressing sensitive issues.</p> <p>Limited awareness and promotion: Insufficient advertising campaigns may result in low awareness among employees about the helpline service, limiting its utilization and impact.</p> <p>Slow response times: Delays in responding to complaints can lead to frustration and diminished trust in the helpline service, discouraging employees from using it in the future.</p>

<p>Success / Positive Issues - Causal factors</p>	<p>Gender-sensitive approach: Providing a female focal point for female callers fosters a more comfortable and trusting environment for discussing sensitive matters, improving the effectiveness of the helpline service.</p> <p>Effective communication and awareness: Conducting advertising campaigns helps raise awareness among employees, ensuring they are well-informed about the helpline's purpose, availability, and benefits.</p> <p>Timely response: Promptly addressing complaints demonstrates the commitment to resolving employee concerns, enhancing trust in the helpline service, and encouraging ongoing usage.</p>
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	

ILO Lesson Learned Template – Lesson 9

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.

LL Element: While the OSH plan of action is a valuable resource for promoting workplace safety, emphasizing its implementation, regular review, and monitoring by stakeholders is necessary to ensure its effectiveness and adaptability to evolving needs and challenges in occupational safety and health:

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>The OSH plan of action is an excellent resource for directing efforts to promote workplace safety. However, in order to produce significant outcomes, it is necessary to emphasize the plan's implementation at various levels – Policy, industry organisations and RMG factories. The OSH strategy at all these levels should be periodically reviewed to evaluate its progress and determine any alterations, both inclusions and exclusions, which may be required to improve its efficacy. Stakeholders may make sure the plan stays relevant and adaptable to changing requirements and problems in promoting occupational safety and health in the workplace by monitoring and reviewing the plan's execution.</p>
<p>Context and any related preconditions</p>	<p>While existence of an OSH plan is an achievement, the next stage of action is needed to ensure its effective implementation at all three levels (policy, industry organisations and factories), and for ensuring mechanisms for periodic review and stakeholder involvement.</p>
<p>Targeted users / Beneficiaries</p>	<p>The target users of these lessons and recommendations are employers, managers, safety officers, employees, labour unions, government agencies responsible for occupational safety and health, and other stakeholders involved in promoting workplace safety. The beneficiaries include workers who benefit from improved safety and health measures, and organizations, which benefit from reduced accidents and improved productivity.</p>
<p>Challenges /negative lessons - Causal factors</p>	<p>Lack of implementation focus: Insufficient emphasis on implementing the OSH plan can lead to limited progress in improving workplace safety and health.</p> <p>Inadequate review and evaluation: Neglecting to regularly review and evaluate the OSH strategy can hinder its effectiveness and limit opportunities for improvement.</p> <p>Lack of stakeholder involvement: Insufficient involvement of stakeholders in monitoring and reviewing the plan's execution may result in a lack of diverse perspectives and limited adaptability to evolving challenges.</p>
<p>Success / Positive Issues - Causal factors</p>	<p>Emphasis on implementation: Prioritizing the implementation of the OSH plan ensures that safety measures and interventions are effectively put into practice.</p> <p>Regular review and evaluation: Periodic review and evaluation enable the identification of strengths, weaknesses, and necessary adjustments to enhance the efficacy of the OSH strategy.</p> <p>Stakeholder engagement: Involving stakeholders in monitoring and reviewing the plan's execution allows for diverse insights, collaboration, and adaptability to improve occupational safety and health outcomes.</p>

ILO Administrative Issues (staff, resources, design, implementation)	
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Annex 8: Emerging Good Practice

ILO Emerging Good Practice 1

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element: The significant transformation³⁷ in the safety culture can be attributed to a combination of regulatory initiatives, policy reforms, new structures, effective protocols, working models, and strengthened capacities of tripartite stakeholders, ultimately resulting in a safer RMG sector.

<p>Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)</p>	<p>As evidenced by this evaluation, the programme has contributed a significant transformation in the safety culture among the targeted BWB (and some NI) factories. Even though this transformation is not yet witnessed across all NI factories and there are several uncovered factories (1000+) which were not part of the RMGP interventions, this is still a good emerging practice of a sectoral reform model that can guide other similar interventions in other country-context by the ILO. Facilitated by the programme, the regulatory initiative of the NTPA guiding legislation and policy, and administrative measures not only facilitated the launch of the three initiatives—ISU, RSC, and Nirapon, but also guided their inspection and safety support measures. By facilitating and /or establishing these structures /institutions, the programme ensured that factories continued to make progress on their CAP. Remediation protocol also helped in this regard. Overall, a range of regulatory initiatives (NTPA, revised BLA/BLR), policy reforms (OSH policy), new structures (ISU), effective protocol (remediation), working models (Industry Safety Forum), and strengthened capacities of the tripartite (Govt, employers and workers organisations) are a profound change for the RMG sector.</p>
<p>Relevant conditions and Context: limitations or advice in terms of applicability and replicability</p>	<p>The above-cited transformation is not applicable to all the factories in the RMG sector. Many NI factories continue to face challenges related to location, lack of owner interest or capability, and limited progress in remediation compared to the aforementioned initiatives. Implementing corrective actions, especially in non-export-oriented factories, remains challenging. Many export-oriented but tier 2 (supplier to tier 1 factories) were also not covered by the program and so ongoing transformations are not witnessed by these factories..</p>
<p>Establish a clear cause-effect relationship.</p>	<p>NPA on OSH, national OSH profile, and LIMA, OSS are exemplary achievements of the programme. Structural interventions (such as ISU within DIFE) played a significant role in making the programme more effective and successful.</p>
<p>Indicate measurable impact and targeted beneficiaries.</p>	<p>A number of new structures /institutions (RCC, ISU within DIFE) were created during the programme period. RSC took over Accord, Nirapon transitioned from Alliance, and the remediation responsibilities of NI factories were entrusted to DIFE temporarily to RCC and are currently in a permanent structure of ISU.</p>

³⁷ Transformation hereby mean sector-wide, systemic change in terms of regulation, policy reforms, capacity of governing institutions (DIFE e.g.), industry organisation and factory management adopting new compliance requirements leading to tangible /concrete results seen in terms of working conditions and well-being of workers

Potential for replication and by whom	These structures and protocols also ensure that the new entrants in the RMG sector are compelled /motivated to invest in building, fire, and electric safety first. This is a profound change. This has potential for replication within the other sectors of Bangladesh and in the RMG sectors of other countries.
Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	The RMG sector reform model as demonstrated by the RMGP over 10 years (since 2013) contributes to all four outcomes of the DWCP-Bangladesh (2022-26).
Other documents or relevant comments	Refer to outcome study and legacy study which provide evidence on sectoral transformations achieved by the RMGP

ILO Emerging Good Practice 2

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element: Sustained enhancement of institutional and technical capacities and the culture of collaboration amongst different stakeholders.

Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)	Another exemplary achievement of the programme is the sustained enhancement of institutional and technical capacities (of DIFE and other institutions of the tripartite such as BGMEA, FBCCI, BKMEA) leading to the ability to cover most NI and export-oriented factories in terms of inspection and safety support services. While it is true that the programme support was more geared towards the remediation of all NI factories, the enhancement of the DIFE's capacity for an effective and improved labour inspection system and the strengthening of regulatory environments governing OSH is expected to support remediation in non-RMG factories as well. The programme enhanced the government's capacity to ensure industrial safety regulation, inspection system, and remediation activities. The programme also relates to the culture of collaboration amongst different stakeholders manifesting in several collaborative initiatives such as OSS, BWB, SDIR, WRC and several other activities of the programme implemented together with industry /employers' organisations and workers' organisations. This has set an example of a tripartite model of programme design and implementation.
Relevant conditions and Context: limitations or advice in terms of applicability and replicability	Challenges exist in integrating different services between the OSS and other licensing and safety-related agencies within the ministry. Technical issues and delays in data collection and uploading pose challenges to the effectiveness of the Labor Inspection Management Application (LIMA). Remediation financing is limited, and factories in shared buildings struggle to access funds.
Establish a clear cause-effect relationship.	The programme enhanced the government's capacity to ensure the industrial safety regulation and inspection system and remediation activities.
Indicate measurable impact and targeted beneficiaries.	The programme also relates to the culture of collaboration amongst different stakeholders manifesting in several collaborative initiatives such as OSS, BWB, SDIR, WRC and several other activities of the programme implemented together with industry /employers' organisations and workers organisations. This has set an example of a tripartite model of programme design and implementation.

Potential for replication and by whom	This has potential for replication within the other sectors of Bangladesh and in the RMG sectors of other countries.
Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	The RMG sector reform model as demonstrated by the RMGP over 10 years (since 2013) contributes to all four outcomes of the DWCP-Bangladesh (2022-26).
Other documents or relevant comments	Refer to outcome study and legacy study which provide evidence on sectoral transformations achieved by the RMGP

ILO Emerging Good Practice 3

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element: Gender roadmap (2020-2030) is a pioneering initiative at a government department in Bangladesh, DIFE.

Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)	The programme has actively supported government agencies like DIFE and BFSCD in enhancing their gender responsiveness through numerous initiatives that have fostered a positive mindset regarding women's capacity and importance among government agencies. Hence, With the assistance of RMGP, DIFE has developed its first-ever gender roadmap, outlining strategic directions for gender mainstreaming and identifying key focus areas for their work from 2020 to 2030. Appointing female Labour inspectors in the field is also remarkable for ILO RMGP II and DIFE.
Relevant conditions and Context: limitations or advice in terms of applicability and replicability	DIFE has limited access to external funding and a visible scarcity of human resources. To ensure progress on gender roadmap , DIFE would need to adopt a strategy of resource mobilization while at the same time adopt resource efficiency measures to optimize costs so that gender mainstreaming activities can be adequately resourced. . If this done well, then DIFE can overcome the limitations of resources while serving as a potential blueprint for other government agencies to follow the gender roadmap.
Establish a clear cause-effect relationship.	Being a government regulatory body, DIFE has the advantage of being integrated into the system in collaboration with ILO RMGP II to apply the theory of change process gradually and effectively within the organization and program. By focusing on policy and regulation, DIFE can make significant strides in enhancing gender equality and promoting women's empowerment.
Indicate measurable impact and targeted beneficiaries.	The targeted beneficiaries will be the women working in DIFE and the RMG sectors.
Potential for replication and by whom	The RMGP II's support has played a key role in creating important strategic documents for Bangladesh, such as the OSH plan of action, DIFE gender road map, NPA, and others. The gender roadmap developed for DIFE is a valuable example that other government departments can use to improve their gender strategies with the help of ILO.

Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	Enabling working empowerment for women and ensuring women's representation in the mandate of ILO (Convention 100, 111,156, 183, 190) and SDGs 1, 5, 8 and 10 are directly linked with the effort.
Other documents or relevant comments	Gender roadmap of DIFE, gender mainstreaming strategies at BFSCD and other institutions supported by the programme

ILO Emerging Good Practice 4

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element: The ILO Convention C190 and R206 were translated, printed, and distributed.

Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)	The translation, printing, and distribution of the ILO Convention C190 and R206, along with other important policies and materials such as the OSH profile policy, COVID-19, and C190 Issue Brief, and SCs committees' responsibilities booklet, proved to be a commendable initiative. Translating these documents into Bangla, the mother tongue of the majority of factory workers, facilitated better understanding and accessibility.
Relevant conditions and Context: limitations or advice in terms of applicability and replicability	It was a brilliant initiative to translate the policies, acts and instructions into Bangla, which is the mother tongue of almost all of the workers in the factory and also easy to understand from the perspective of their academic level on understanding. The factory visit evaluator found that the applicability is palpable, and grassroots-level workers know about the laws and policies.
Establish a clear cause-effect relationship.	"A picture worth 1000 words"- graphic presentations/posters/leaflets and wall hangings inside the factories is more viable, so this initiative is considered a positive change impact. During the factory visit evaluators observed that workers were aware of the laws and policies, indicating their tangible applicability at the grassroots level. The use of graphic presentations, posters, leaflets, and wall hangings inside the factories was recognized as an impactful change, as visual aids conveyed information effectively. Further workshops, training sessions, and increased circulation of materials in Bangla would be beneficial for the factory workers, ensuring enhanced understanding.
Indicate measurable impact and targeted beneficiaries.	Factory-level mass workers are the beneficiaries; they understand the Bangla better-more workshops, training, and visible circulation will work more effectively.
Potential for replication and by whom	ILO and other partner organizations, such: as employers' federations, Brands and MoLE
Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	RMGP II gender strategy focus area 3 is directly mentioned the capacity building and knowledge generation initiatives, the mandate of ILO (Convention 100, 111,156, 183, 190) and also SDG no 5, 8, 10
Other documents or relevant comments	ILO C190 ratification process and impact achieved by other countries, as it can provide inspiration and guidance to ongoing campaign

ILO Emerging Good Practice 5

Project Title: Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II) & Building Responsible Value Chains in Asia through the Promotion of Decent Work in Business Operations – Bangladesh country component.

TC/SYMBOL: BGD/19/05/MUL) / (BGD/22/50/JPN

Name of Evaluators: Ravinder Kumar, Jakir Hossain, Afsana Islam, Arafat Khan

Date: 20 June 2023

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element: Better Work Bangladesh (BWB), as a part of the RMGP II, has actively engaged in the RMG industry to promote gender equity and safety measures.

<p>Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)</p>	<p>The BWB has diligently ensured women's inclusion in safety committees within factories, as mandated by national law, and the establishment of anti-harassment committees following court orders. BWB of RMGP II has launched two noteworthy initiatives called Mother at Work and GEAR. These initiatives are aimed at supporting working mothers with a range of support measures and promoting technically skilled female worker to achieve supervisory and other leadership positions within the factories. These initiatives have demonstrated their effectiveness (see the evidence cited in many places in this evaluation report) towards ensuring gender equality within the RMG industry.</p>
<p>Relevant conditions and Context: limitations or advice in terms of applicability and replicability</p>	<p>BW is reported to have a prevalent and affirmative impression among management, employers, workers' organizations, as well as among factory-level workers. Although this program has so many women centered innovative initiatives, but presently working on a minimal number of factories. These numbers should be increased for the betterment of the female workers.</p>
<p>Establish a clear cause-effect relationship.</p>	<p>These initiatives aim to improve female workers' conditions in the RMG sectors. So as women represent the most significant number of RMG sector workers, protecting their rights would positively impact overall production.</p>
<p>Indicate measurable impact and targeted beneficiaries.</p>	<p>Female RMG sectors workers, employers, and overall future generations of the country</p>
<p>Potential for replication and by whom</p>	<p>BWB, ILO and partner organizations</p>
<p>Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)</p>	<p>RMGP II gender strategy, BW objectives, the mandate of ILO (Convention 100, 111, 156, 183, 190) and also SDG no 5, 8, 10</p>
<p>Other documents or relevant comments</p>	<p>BWB documentation on M@W and GEAR initiative</p>

Annex 9. Complaint and Grievance handling by DIFE, RSC and Nirapon

Aspect	DIFE Complaints Management System (CMS)	RMG SUSTAINABILITY COUNCIL (RSC) Occupational Safety and Health Complaint Mechanism	NIRAPON
Achievements	<p>With the support provided by RMGP, DIFE established its labour helpline in 2015 and continued its operation through RMGP funding. With technical support from RMGP, DIFE started its call center for the Helpline in January 2021. The Helpline initiated its service in January 2021. A complaints cell at DIFE's head office was established to operate the Helpline, receive complaints and follow-up resolution of complaints.</p> <p>Through LIMA, they can submit the complaint keeping their identity confidential and can find regular updates on the submitted complaint. The scope of anonymously complaining should help workers, particularly female workers, feel safe reporting against their employers³⁸.</p> <p>There is no increase. However, a total of 3191 complaints were made in Jul 2021-Jun 2022. DIFE published its monthly complaints reports on its website. From January to March 2023, DIFE received 11 complaints from the online platform (via Helpline and LIMA) and resolved 100% of complaints in the reporting period.</p>	<p>The RSC inherited the operation of OSHCM in June 2020. Brand Signatory companies and Union Signatories of the International Accord are required to ensure that through the RSC, the OSHCM continues to provide effective remedies to workers independently and autonomously as part of our core objectives.</p> <p>1885 RSC Covered Factories, Total Complaints Received (1 June 2020 –30 April 2023) Since June 2020, the RSC received 4,259 complaints, out of which 1,096 (26%) are Occupational Safety & Health (OSH) related complaints and 3,212 (75%) are non-OSH related complaints.</p> <p>Working environment related (incl. COVID-19 related, unsafe drinking water supply, excessive heat, workplace Violence, forced overtime, denial of maternity pay/leave, rights, denial of sick leave, physical and sexual Harassment): 590.³⁹</p>	<p>The Amader Kotha Helpline tracks all calls and their outcomes, providing accurate reporting on factory safety and other issues. The Helpline's data also helps Nirapon formulate strategies to prevent accidents and start to predict emerging risks.</p> <p>22.46% (1,508) of calls received were substantive issues. A majority (73.8%) related to low-level labour issues such as compensation (including wages and bonuses), termination and leave, and verbal abuse from supervisors. 7 high-level safety and 6 high-level labour issues were reported to the Helpline.</p> <p>The most reported priority issues were related to physical abuse and harassment, sexual abuse and harassment, worker injuries or fatalities, and active factory for a total of 13 incidents. High and medium-level labour and safety issues comprised 0.7 % of all calls during the quarter.</p>
Sex-disaggregated data	No sex-disaggregated data was found or not provided details complaints on documents or the LIMA website.	No sex-disaggregated data was found, but Detailed complaints were found from the cases from 2017-2023 on website archives.	No sex-disaggregated data was found or not provided details complaints on documents or websites.

³⁸ RMGP Legacy report 2022

³⁹ RMG SUSTAINABILITY COUNCIL (RSC) MONTHLY UPDATE APRIL 2023, <https://rsc-bd.org/storage/app/media/RSC%20Annual%20Report%202021-22.pdf>

Aspect	DIFE Complaints Management System (CMS)	RMG SUSTAINABILITY COUNCIL (RSC) Occupational Safety and Health Complaint Mechanism	NIRAPON
Information link	https://lima.dife.gov.bd/public-report/complaint-resolving-efficiency	https://www.rsc-bd.org/storage/app/media/RSC%20Annual%20Report%202021-22.pdf	https://amaderkothahelpline.net/wp-content/uploads/2023/05/AmaderKotha_Q1-2023.pdf