



Safety + Health for All Workers in South Asia – Final Internal Evaluation

QUICK FACTS

Countries: India, Nepal, Sri Lanka

Evaluation date: 27 February 2025

Evaluation type: Project

Evaluation timing: Final

Administrative Office: ILO DWT/CO New Delhi

Technical Office: OSHE BRANCH

Evaluation manager : Justine Tillier

Evaluation consultant(s): Lotta Nycander

DC Symbol: RAS/20/08/JPN

Donor(s) & budget: Government of Japan, 3.7 million USD

BACKGROUND & CONTEXT

Summary of the project purpose, logic and structure

The long-term objective/goal of the project is “a conducive policy environment at national, provincial and municipal level together with an effective social dialogue platform at the field level, where management and workers can collaboratively promote a safe and healthy working environment”. The three immediate objectives are:

1. Generating and sharing knowledge on constraints and opportunities to improve the safety and health of workers and prevention discrimination in the plantation sector; **2. Strengthening national and local institutions** to better promote and protect the safety and health of plantation workers in India, Nepal and Sri Lanka; and **3. Developing or strengthening workplace and industry level practices** and initiatives to promote the safety and health of workers. There are a total of 6 key outputs to contribute to achieving the immediate objectives (2 for each of the objectives).

Present situation of the project

The Project was closed on 31 December 2024.

Purpose, scope and clients of the evaluation

The evaluation’s purpose is to provide an objective assessment of the Project’s progress on the achievement towards the project’s development objectives and performance based on the Project’s results framework. The chronological scope is to assess and evaluate the Project’s entire period from December 2020 – to December 2024. The geographical scope is India, Sri Lanka and Nepal.

The clients are the principal tripartite stakeholders, namely the Governments, Employers’ and Workers’ organisations and ultimate beneficiaries in the three countries; ILO staff; and the development partner/donor agency.

Methodology of evaluation

The methods used to gather data include documentation review; briefing sessions; Key Informant Interviews (KII); Focus Groups Discussions (FGDs); Field observations and Questionnaire Survey.

The Project Manager and Interim Coordinator, and project NPCs briefed the evaluation team through virtual (online) sessions. The KIIs and the FGDs were undertaken face-to-face in the three countries. Field observations was an important element, in particular when visiting tea plantation estates, tea and cardamom factories, health clinics. The questionnaire survey was sent to project staff. To ensure credibility and validity of the results, methodological triangulation of the data/information from the various above-mentioned methods was

applied, i.e. information received was cross-checked from more than one source – as an integral part of the whole data collection and processing/analysis phase.

MAIN FINDINGS & CONCLUSIONS

Relevance and coherence

a) The Project has been **relevant**. Consistency was found with ILO “Flagship Programme Safety + Health for All” and its 4 pillars; the occupational safety and health needs in the three countries and target areas, sectors and enterprises; as well as the priorities of ILO tripartite constituents and plantation workers and small growers/workers - the latter being informal economy workers, and not earlier been “targeted” in OSH awareness raising events or training.

b) The Project also has **coherence** through its contributions to the implementation of two ILO OSH Fundamental Conventions 155 and 187; its Global Strategy on OSH; and the ILO Programme & Budget (2020-21 which was the programme at the time the Project was set up). There is also coherence vis-à-vis the SDG No.8 (economic growth and especially decent work for all), SDG No. 5 (gender quality) and SDG No. 10 (reduced inequalities). Furthermore, the Project is in line with the DWCP in the respective three countries. There is no evidence of synergy with *other* UN agencies, or with NGOs.

Effectiveness

The Project is assessed to have been **effective, overall** – as the evaluation has shown that it has been able to produce the vast majority of the Outputs, and contribute to all three Outcomes. The Project had a slow start and faced a number of challenges. However, in a short time span between mid 2023 and December 2024 a number of developments and events took place. It has addressed lack of awareness, knowledge and practices on OSH in the plantation sector. Capacity building, often through participatory approaches, of all involved stakeholders, has been the main vehicle to motivate changes. The message has been conveyed that workers (women and men) have a *fundamental right* to safe and healthy working conditions – hence improvements must be made to avoid accidents, injuries and diseases.

National policies and programs: The Project has raised awareness among stakeholders about the two OSH conventions C155 and C187 in all three countries the fact that ILO in 2022 declared OSH as a core

convention and one of the Fundamental Principles of Rights. Much effort has been placed on developing national and state OSH profiles, policies and programmes together with the tripartite partners. *Examples* of good results are: India: 1) OSH programmes were developed at state levels (Assam and West Bengal) - integrating policy directives with practical implementation; 2) Nepal: A draft OSH programme was submitted to the MoLESS and a national OSH tripartite committee has been formed - and FNCCI and trade unions have also set up OSH “promotion” committees; 3) Sri Lanka: A final OSH policy and programme was submitted to the government and a National OSH profile was developed.

Capacity development: Capacity building was a major component of the Project. It included raising awareness and imparting knowledge about OSH, through Training of Trainers/cascading training, among high-level government officials; labour inspectors; administrators, and unions and cooperatives, at national, provincial/district - as well as managers and workers at estate/enterprise levels. All in all, 25643 (F:15445 and M:10198) persons have benefited from outreach and participated in training events on OSH, including on-the job at enterprise/plantation/field level.

Studies undertaken: Studies were commissioned to increase knowledge and *guide* the project implementation. Legal Gap Assessments on law and practices were undertaken in all countries. In Nepal, the Project undertook a ‘diagnostic study in tea and cardamom sectors’, with the Department of Labour and Occupational Safety. In Sri Lanka the National Institute of Occupational Safety and Health undertook a ‘diagnostic study on the tea, coconut, and plantation sectors’. The Project supported the Employment Federation Ceylon in undertaking a study on ‘ergonomics, time, and motion’ in the tea plantation sector to identify and explore the various health risks within 10 critical jobs. In India the planned diagnostic study in the plantation sector had to be dropped from the work plan as a result of discussions held with the Government in 2022. The activity was replaced with consultations on OSH with stakeholders in different sectors.

Efficiency

It has been assessed that the level of efficiency in relation to the use of resources was **satisfactory** and the results generally justified the costs. Regarding financial resources, it is worth mentioning that the budget delivery was not optimal as resources could not be fully spent



in the end and that no funds could be spent on joint meetings with the three countries, to share knowledge, good practices and experience. The utilization of human resources has been problematic in all three countries i.e. there was an unusual high staff turnover disrupting continuity of project implementation causing some loss of continuity and appreciation of the original intent of the Project.

It has also been assessed that ILO field and Headquarters, Specialists and the Flagship Programme management team in Geneva have supported the Project's implementation - which has been crucial, in mitigating the adverse effects of the high staff turnover issues and, in particular, in helping to find solutions and achieving results. The Project has benefited from an overall coordination in the implementation among the respective ILO country offices in Delhi, Kathmandu and Colombo and the Decent Work Teams; the ILO Headquarters and the ILO regional office in Bangkok.

Impact

The project has been able to generate **good impact** despite the delays and short time that was devoted to actual implementation at the workplace level in plantations. The fact that most safety measures at enterprise/factory level were not costly, and constitute relatively easy fixes, enabled the Project to get the managers' consent to "enter" into the privately owned and closed tea gardens/estate plantations and generate impact on OSH - for which it should be given credit. It has also worked with Small Tea Growers/farmers who are 'unprotected' in terms of their enterprises not being part of the formal economy. According to the ILO this is the first time that it has been able to work on capacity-building and institutional processes specifically on workplace safety in the tea plantations - and contribute to working women and men being represented in **OSH committees**, enabling their voices to be heard.

The improvements made at **enterprise/factory** are many and cannot be listed here (see chapter 3.6.) but they range from using protective gear when working in the fields and inside factories; making improvements of tea leaves collecting baskets; cleanliness of toilets; installing fire extinguishers; fire exits and drills; using stools to climb on to reach machines placed at higher level; ensuring daylight in factories or adequate lighting and maintenance; and safeguards around machines. The evaluation found that in many cases both female and male members of the OSH committees in the work places expressed

appreciation for the changes made, and have often suggested the improvements and/or taken part in materialising them with the managements. The evaluations' assessment is however that it is too early to know if the OSH committees will continue to function as intended in the long term - and if knowledge and attitudes will be *internalised* among managers and workers and have a significant impact on the workers' health and safety.

Members of **Small grower societies** have also reported on changes made after participating in training such as learning about safe practices with respect to handling certain chemicals, and keeping them separate – and extending the OSH activities to encompass even their local neighbourhoods and public places.

The Project's title includes both safety and health. The evaluation found that **health issues were to a much less extent addressed**, compared to safety.

Sustainability

The aim of the Project has been to address immediate OSH concerns in workplaces through the establishment of systems, structures and practices for safety and health and for them to be *sustained*. The following are **some interesting examples of potential sustainability**:

In India, DGFASLI (Assam, the State Labour Department), India, has initiated a year-long sectoral programme on OSH that may also benefit workers in the tea plantations; and the State Labour Department has issued a circular on strengthening OSH data collection, accident reporting and follow up: The Municipality in Suryodaya, Ilam district in Nepal is implementing an OSH model that has the potential to be replicated and become sustainable also in other municipalities and will be followed-up under ILO Nepal's regular budget. The NIPM in Sri Lanka has included OSH into its programme, in nine training programmes, and *specifically targeted estate managers*, across tea, rubber, and coconut plantations. The PHDT is now addressing OSH in its health services and is seeking its Board's support to *also work with small growers*. The trade union CWC is planning to continue OSH training and cover 1,417 divisions. The EFC has enriched its training course on OSH for employers with a better understanding after the interaction with the estate workers involvement in OSH Committees.

To what extent knowledge and new attitudes about health and safety will be “internalised” among stakeholders, and especially at workplaces, remains a question that should be followed-up.

Challenges

All projects face some problems and challenges. In the case of the Safety + Health for All in South Asia, it was found that the Project had more than its fair share. The *main* challenges were late approval of the India component; Covid pandemic; very high turnover of staff in the Project (and within governments); severe economic crisis in Sri Lanka; elections in Nepal hindering the engagement of constituents; and the donor’s funding arrangement for the Project that hindered continuity of the implementation as the 3-year budgeted funds were only given one year at a time.

Cross-cutting concerns

Regarding cross-cutting concerns such as capacity development, International Labour Standard, norms, social dialogue and tripartite representation, the **Project has performed well**. It has also been mindful of non-discrimination, however, one aspect of non-discrimination was not addressed, namely ‘disability’. Disability was not mentioned in the Project Document it is an important consideration of ILO’s policies.

Regarding gender equality concerns the Project did not conduct any specific gender analysis or develop a gender strategy on how to work with gender equality issues which is surprising in view of the fact that *2 of the 6 key outputs* in the LFA specifically mention that focus is on “women workers”. Still, much **effort was made to raise awareness and appreciation for the situation of women workers**. Training and promotional materials highlight the fact that female workers in the plantation industry are more vulnerable and more at risk in terms of safety and health than male workers. Links between gender-based violence and OSH, and preventive strategies are explained in the training methodology and materials used. In its strategic meetings with the Project’s implementing agencies (trade unions, cooperatives) the discussions have been held on women’s work, OSH challenges and sexual harassment. The project also **insisted and ensured that training events and all OSH committees include women**. At the higher organisational level of the Project, the evaluation found that the importance of gender mainstreaming and the need to focus on working women due to their vulnerability was quite appreciated. At local work



place levels, involved in the Project, the evaluation’s findings are that the work on gender issues had not made much of a dent and that *attitudes hindering improved health and working conditions of women workers* prevail.

RECOMMENDATIONS, LESSONS LEARNED AND GOOD PRACTICES

Recommendations

1. Addressed to the ILO and tripartite stakeholders. Priority: High. Resources: Medium–High. Timing: Immediate or within 6 months.

The tripartite constituents and ILO should follow-up to what extent new OSH practices and systems (and attitudes) are “internalised” at workplaces and the impact on workers’ safety is sustained also in the long term.

2. Addressed to the ILO and the tripartite stakeholders. Priority: High. Resources: Medium– High. Timing: Within 6 – 12 months.

ILO should make more effort in promoting/explaining a broader appreciation of the gender concepts to the tripartite partners – including identifying the social dynamics between men and women, and their respective roles and needs, as well as the division of labour. The Partners should appreciate that the gender equality is not equal to “women participation” in committees and training events.

3. Addressed to the ILO. Priority: Medium. Resources: Medium-High. Timing: within 12 months.

The ILO should consider utilizing the experience gained from engaging Small Growers Associations in the plantation sector - to develop technical cooperation initiatives and support to Self-help Groups and *widen* the support to not only focus on OSH, but also entrepreneurship development to strengthen their bargaining power, increase incomes and enhance livelihoods.

4. Addressed to the ILO. Priority: Medium. Resources: Low. Timing: Immediate or within 6 months

The Project has had unusually many changes of staff and the ILO should examine what the reason for this was, and make efforts as much as possible to avoid such a situation in future projects.

5. Addressed to the ILO. Priority: Medium. Resources: Low. Timing: When new projects are to be implemented.



	<p>When commissioning implementing agencies (e.g. trade unions/workers organisations) to act as Implementing Agencies, ILO and the IAs should ensure that:</p> <ol style="list-style-type: none"> a. They possess the technical knowledge and capacity required for the tasks, if beyond <i>advocacy</i>. If not adequate – certain tasks should be given to external consultants, or ILO experts; and b. The tasks in Implementing Agreements can realistically be undertaken and completed within the set timeframe. <p>6. Addressed to the ILO and tripartite stakeholders. Priority: High. Resources: Medium. Timing: When new projects are to be implemented.</p> <p>Disability is an important consideration of ILO’s policies as a part of non-discrimination and should be included in technical cooperation projects, with clear strategies on how to include persons in target groups who have disabilities.</p>
<p>Main lessons learned and good practices</p>	<p><i>Lessons learned (see section 6 for details)</i></p> <ol style="list-style-type: none"> 1. All technical cooperation projects should, as a general “rule”, have 6 months <i>dedicated</i> as inception period after CTAs/project managers are on board. 2. Manage expectations and drawing Implementation Agreement plans that realistically can be completed within the time period, especially when starting work in new areas. <p><i>Good practices (see section 6 for details)</i></p> <ol style="list-style-type: none"> 1. Applying participatory approaches in Training of Trainers of tripartite stakeholders including field visits to factories and work areas in rural/agricultural areas/plantation sector. 2. Organising self-evaluations and award ceremonies for winners of competitions on best and most innovative work of OSH committees.