



International Labour Organization

iTrack  
Evaluation

# ILO EVALUATION

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- **RMGP II - USD 24.5 million, BWB II and affiliated - USD18.4 million**
- **Evaluation Manager:** Ms. Pamornrat Pringsulaka, Regional M&E Officer
- **Key Words:** OSH, Labour Inspection, Better Work, International Labour Standards, Compliance

*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*

Cluster Independent Mid-term Evaluation of RMGP II and BWB and its affiliated projects



Photo Credit: Better Work Bangladesh

# CLUSTER INDEPENDENT MID-TERM EVALUATION REPORT

## RMGP II AND BWB AND AFFILIATED PROJECTS

SEPTEMBER 2020

<b>Project Title</b>	<b>1. Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2 (RMGP II)</b> <b>2. Better Work Programme Bangladesh (BWB) and its affiliated projects</b>
<b>ILO Project Codes</b>	<b>1. Improving Working Conditions in the Ready-Made Garment Sector RMGP – Phase 2</b> BGD/16/03/MUL (or BGD/19/05/MUL)  <b>2. Better Work Bangladesh</b> BGD/16/50/AUS, BWB Phase II (June 2016 to June 2022) BGD/18/01/CEF, Support to UNICEF Mothers@Work programme (June 2018 to August 2020) BGD/17/51/MUL, BWB Phase II (September 2019 to October 2021) BGD/12/50/USA, BWB Design and Beyond (November 2011 to February 2020) BGD/18/04/GAP, Strengthening social dialogue in GAP factories in Bangladesh (January 2019 – December 2021)
<b>Geographic Scope</b>	<b>Bangladesh</b>
<b>P&amp;B Outcome</b>	<b>Outcome 7: Promoting workplace compliance through labour inspection</b>
<b>DWCP Outcome</b>	<b>BGD227: Capacities of labour administration and institutions improved</b>
<b>Technical Field</b>	<b>Labour administration and inspection</b>
<b>Administrative Unit in charge</b>	<b>ILO Country Office for Bangladesh</b>
<b>Technical Backstopping Unit</b>	<b>GOVERNANCE</b>
<b>Time frame</b>	<b>RMGP II - 72 months (01 July 2017 – 30 June 2023)</b> <b>BWB II - 60 months (01 July 2017-30 June 2022)</b>
<b>Budget</b>	<b>RMG II - USD 24.5 million</b> <b>BWB II and affiliated – USD18.4 million<sup>1</sup></b>
<b>Funding Agencies</b>	<b>1. Department of International Development (DFID)</b> BGD/19/05/MUL US\$8,505,154 (6.6 million pounds) Jul 2017 – Jun 2023 <b>2. The Netherlands Ministry for Foreign Trade and Development Cooperation</b> BGD/19/05/MUL US\$8,179,474 Jul 2017 – Jun 2023 <b>3. Department of Foreign Affairs, Trade and Development (DFATD), Canada</b> BGD/19/05/MUL.. CAD \$10,000,000 Jul 2017 – Jun 2023 <b>4. The Department of Foreign Affairs and Trade, Australia</b> BGD/16/50/AUS US\$ 1,400,000 Jun 2016 – Jun 2022

<sup>1</sup> This is the overall amount of funding needed, a proportion comes from the RMG II budget, a proportion from factory/buyer revenue for services and the rest from private sector and institutional funders (see list below). The programme is not yet fully funded until the end of 2022.

	<b>5. UNICEF BGD/18/01/CEF US\$ 263,695 Jun 2018 – Aug 2020</b> <b>6. Swiss State Secretariat for Economic Affairs</b> <b>SECO, Danish and German BGD/17/51/MUL US\$ 2,273,863 Sep 2019 – Oct 2021</b> <b>7. United States Department of Labour</b> BGD/12/50/USA US\$ 2,748,334 Nov 2011 – Feb 2020 <sup>2</sup> <b>8. GAP, Inc. BGD/18/04/GAP US\$ 500,000 Jan 2019 – Dec 2021</b>
<b>Type of Evaluation</b>	<b>Independent</b>
<b>Timing of Evaluation</b>	<b>Mid-term</b>
<b>Evaluation Manager</b>	<b>Ms. Pamornrat Pringsulaka, Regional M&amp;E Officer</b>
<b>Evaluators</b>	<b>Ms. Sandy Wark and Dr. Shantanu Majumder</b>

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<sup>2</sup> Expecting \$526,503 for the period 2020-2022

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## Acronyms

Accord	Bangladesh Accord on Fire and Building Safety
AFD	Agence Française de Développement (French Development Agency)
Alliance	Alliance for Bangladesh Worker Safety
BEF	Bangladesh Employers' Federation
BEZA	Bangladesh Economic Zones Authority
BFSCD	Bangladesh Fire Service and Civil Defence
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BIDA	Bangladesh Investment Development Authority
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
BV	Bureau Veritas
BWB	Better Work Bangladesh
CAP	Corrective Action Plan
CDA	Chattogram Development Authority
CEACR	Committee of Experts on the Applications of Conventions and Recommendations
DEA	Detailed Engineering Assessment
DIFE	Department of Inspection for Factories and Establishments
DIG	Deputy Inspector General of DIFE
EU	European Union
GEAR	Gender Equality and Returns
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GOB	Government of Bangladesh
IFC	International Finance Corporation
IG	Inspector General of DIFE
ILO	International Labour Organization
ILS	International Labour Standards
ISU	Industrial Safety Unit
ITC	International Training Centre
JICA	Japan International Cooperation Agency
LIMA	Labour Inspection Management Application
MOLE	Ministry of Labour and Employment
NI	National Initiative
NPA	National Plan of Action
NTC	National Tripartite Committee
OSH	Occupational Safety and Health
OSS	One-Stop-Shop
PCs	Participation Committees
RAJUK	Rajdhani Unnayan Kartripakkha (Dhaka Capital Development Authority)
RCC	Remediation Coordination Cell
RSC	Ready-Made Garment Sustainability Council
RMG	Ready-Made Garment
RTM	Remediation Tracking Module
SA	Strategic Area
SCs	Safety Committees
SDIR	Social Dialogue and Industrial Relations
SOPs	Standard Operating Procedures

Cluster Independent Mid-term Evaluation of RMGP II and BWB and its affiliated projects

UD	Utilisation Declaration
UK	United Kingdom
USA	United States of America
USD	United States Dollar

## 2. Executive Summary

### Project and evaluation overview

The evaluation office of the International Labour Organization (ILO) commissioned an independent mid-term evaluation (MTE) of the two main complimentary ILO programmes aimed to improve working condition and enhance the competitiveness of the ready-made garment (RMG) sector in Bangladesh:

- Improving Working Conditions in Bangladesh's Ready-Made Garments sector Phase II (RMGP II, 2017-23),
- Better Work Bangladesh-BWB and associated projects (funded through the RMGP-II and additional funding sources)

The evaluation's goal was to review the progress made toward achieving intended results and outcomes, identify lessons learned, and recommend possible programmatic adaptations during the programmes final implementation period. The mid-term evaluation draws on RMGP II performance data as well as qualitative and quantitative data collected from programme stakeholder interviews, online surveys and programme documents as well as secondary research. This report presents the evaluation's principal findings, conclusions, and recommendations.

### Findings and Conclusions

#### Relevance and Design Validity

**RMGP II objectives and strategies largely aligned with Ministry of Labour and Employment (MOLE) needs and priorities but to a lesser extent with those of other ILO constituents.** The programme's efforts to address industrial safety concerns, OSH policy and practice as well as its Labour Inspectorate capacity building efforts are highly relevant given the RMG sector's importance in Bangladesh's economy and the Government of Bangladesh's (GOB) future ambitions to become a major global manufacturing hub. RMGP II activities were relevant to all ILO constituents to the extent that government, workers and employers were all concerned with preventing future industrial accidents and assuring international brands and buyers that goods sourced from Bangladesh respect ILS and national labour laws. However, RMGP II's large focus on government capacity building did not satisfy workers' and employers' organizations expectations and perceived capacity building needs. For its part, BWB, both a component of RMGP II and its own stand-alone programme, was largely unfavourably perceived by national level ILO constituents, which still have limited direct collaboration with the programme. However, evaluation findings show its relevance to factory-level stakeholders' and their brand partners' needs was overall high for a variety of reasons BWB factories managers perceived the programme to have been good for business while workers cited improvements in their welfare and working conditions.

**RMGP II and BWB planned interventions aligned with ILO priorities and strategic plans and with national, regional and international development frameworks.** The programmes' planned intervention strategies aimed to help national counterparts uphold International Labour

Standards (ILS) and national labour laws, engaged tripartite bodies, and integrated gender equity concerns effectively. RMGP II and BWB strategies also aligned with and contributed to key national, regional and international economic development and decent work agendas such as the GOB's Vision 2021 and the Seventh Five Year Plan (2016-2020), Bangladesh's Decent Work Country programme (2017-2020), multinational frameworks on sustainable supply chains and the Sustainable Development Goals (Agenda 2030).

**RMGP II and BWB interventions strategies generally drew on ILO strengths and adequately considered country level challenges and opportunities, but some strategies could be improved.** National Initiative (NI) remediation strategies followed through on phase one audits and appeared relatively well designed to strengthen enforcement. However, they do not address many of the root causes of NI factory safety problems, such as the factories' financial and management challenges. Additional interventions appear needed to upgrade NI factories and preserve employment, more so now given new Covid-19 related challenges. RMGP II strategies to improve factory licensing processes and strengthen coordination among GOB agencies were likewise valid but their focus on building online systems risk being overly technology-centred while most challenges are enforcement capacity related. Overall, the ILO RMG portfolio showed strong thematic synergies, even though funding was unevenly distributed and some areas such as minimum wage-setting mechanisms and labour court reform are not currently addressed by current projects. To date, RMGP II and BWB have not adequately capitalized potential implementation synergies although CO reflections on a "cluster approach," explicitly aimed at improving both thematic and operational synergies in the CO RMG portfolio, may bring improvements.

**Among new emerging risks affecting programme interventions' efficacy, the coronavirus pandemic is clearly at the top of the list.** Evaluation findings show important new challenges with large potential negative consequences on workers' health and well-being as well as on Bangladesh's RMG industry and national economy, with shrinking orders, loss of employment and limited social protection being major constituent concerns. At the time evaluation data collection with national stakeholders (April-May 2020), RMGP II and BWB efforts to readjust to the post-pandemic reality were in their early stages. Early ILO guidance and awareness-raising efforts on how to prevent virus spread in the workplace and efforts to facilitate dialogue within the industry were well-appreciated by national stakeholders, who nevertheless held high expectations for more comprehensive future support. For its part, the CO, RMGP II and BWB leaders appeared cognizant that national priorities and needs were shifting and would require a revision of existing RMGP II and BWB intervention strategies as well as related output and outcome indicators.

#### Implementation progress and effectiveness

**Strategic Area (SA) 1 Remediation: Despite RMGP II's relatively strong performance achieving output targets, progress on actual NI factory remediation has been slow and is unlikely to accelerate in the near term.** Several hundred unsafe NI factories have been shut down thanks to RMGP I and II remediation efforts as well as economic factors. Nevertheless, slow follow-up and reported partial implementation of the remediation escalation protocol (officially endorsed in July 2019) by DIFE and by BGMEA suggests limited political will to strictly enforce deadlines, a challenge likely to be exacerbated given current national concerns to preserve employment

during and after the Covid-19 pandemic. Among the 645 factories with outstanding corrective action plans, the limited number of NI factories that have started remediation or accessed remediation funding suggests that upscaling DIFE technical capacity and informing NI factories about funding opportunities are unlikely to be effective achieving 100 percent remediation by the end of 2020. However, progress appears to have been made improving cooperation and knowledge-sharing between DIFE and private sector engineering teams hired by RMGP II. These capacity building efforts should benefit DIFE's planned Industrial Safety Unit (ISU), although the ISU strategy still needs to be more fully fleshed out and discussed among tripartite constituents. Although building the future units' capacity will likely take time, ISU creation holds promise for sustaining remediation work and for facilitating the extension of DIFE industrial safety monitoring to other sectors needing oversight.

**SA 2 Governance:** With delayed One Stop Shop (OSS) and gender roadmap implementation, RMGP II contributions to improving labour governance have been mostly DIFE focused, and mainly on improving inspection tools and procedures. While the former made good progress and, especially in the case of the LIMA inspection module and inspection check lists, have been largely institutionalized, efforts to build DIFE capacity to determine priorities, including how to cooperate with new industry initiatives such as the RMG Sustainability Council (RSC), have been limited to date. In the absence of stronger DIFE capacity to use and follow-up on inspection and other data, such as worker complaints, RMGP II interventions' impact on compliance will likely be limited. In this respect, delayed progress developing a comprehensive DIFE training strategy, while a gap, is also an opportunity to ensure the plan includes interventions to build DIFE's analytical competencies. Moreover, given the scope of labour inspector responsibilities, their still limited numbers and enforcement capacity, scope exists within SA2 to strengthen DIFE's awareness raising strategies, building on successful OSH awareness raising (national day celebrations, Annual OSH Awards) and factory-level stakeholder empowerment intervention strategies using, among others, BWB factory-level stakeholder empowerment interventions (participation committee facilitation, sexual harassment prevention training).

**SA 3 OSH:** RMGP II OSH policy work advanced well, and if validated, should lay a foundation for a comprehensive national OSH strategy. However, planned efforts to capitalize past successes around factory safety committees largely lagged, except in BWB factories. The planned National Plan of Action (NPA) holds promise to provide a framework for future OSH interventions but its impact on worker safety and health is largely dependent on implementation, including institutionalizing RMG remediation and labour governance interventions and continued factory level stakeholder capacity building.

**SA 4 BWB:** BWB programme expansion accelerated modestly, producing positive BWB factory level results related to compliance, women worker empowerment and worker/employer dialogue, especially among factories in the programme for longer. Evaluation findings also suggest BWB has contributed to reducing compliance audit duplication in some subscriber factories, as more brand partners agreed to forego their own audit process and accept BWB reports. Communication activities also intensified, with greater efforts being made to share BWB success stories with industry stakeholders. The Covid-19 crisis appears to have accelerated Better Work supplier/brand facilitation activities at the factory, national as well as at the global

levels, offering the programme the opportunity to capitalize on its strong brand relationships to help overcome the current crisis and rebuild trust. Relatively less progress was made strengthening BWB engagement with DIFE, industry associations and workers organizations, although Better Work Global and BWB personnel indicated plans for broader national level stakeholder engagement in the future to build programme sustainability and share its good practices and lessons learned to reach a broader segment of the industry.

### Resource use efficiency and management effectiveness

**RMGP II implementation delays suggest less-than-optimal resource use, which were partially mitigated by the programmes' largely effective leveraging of ILO's global, regional and national expertise, knowledge base, as well as the CO's strong tripartite constituent relationships.** The programme faced many external challenges that negatively affected progress and was to varying degrees proactive and effective analysing the causes and finding solutions. Planned budgetary revisions provide programme managers the opportunity to review planned interventions and expenditures in light current priorities, and potentially to increase operational synergies within the CO's RMG project portfolio.

### Sustainability and impact orientation

RMGP II work strengthening governance structures and facilitating systemic approaches to promoting safe and decent work, while relatively slow producing some planned results, is compensated by its relatively high impact and sustainability potential. For example, the programmes DIFE institutional capacity building efforts offer opportunities to replicate good practices in sectors outside RMG and leverage national expertise and budgetary resources to sustain interventions beyond the programme intervention period. There is already evidence of the latter, based on DIFE's reported plans to extend electrical and fire safety activities to other sectors using their own resources. RMGP II remediation and BWB factory level interventions have already successfully addressed issues affecting workers' lives and safety. In the case of BWB, by building stronger synergies with national level work, the programme also has the potential to contribute to improving the broader enabling environment by demonstrating, among other approaches, how improved worker/employer dialogue and women worker empowerment contributes to industry bottom lines.

### Recommendations

The following six recommendations of the evaluation are addressed to the ILO:

#### **1. The ILO should focus remediation interventions on longer term DIFE capacity building related to the ISU and strengthen NI factories access to remediation financing**

- Intensify capacity building for DIFE related to ISU, focus on core group of DIFE engineers
- Facilitate tripartite consultations and discussion on ISU as well as how ISU and Ready Made Garment Sustainability Council (RSC) will interact
- In ILO's post Covid-19 RMG strategy, explore feasibility of program for small and medium factories that provide holistic assistance to improve safety, compliance with ILS and productivity, for example SCORE, WISE
- Advocate for factory upgrade financing facilities appropriate for small & medium factories

- Donor partners should consider funding partial remediation grants or soft loans to NI enterprises for safety upgrades for enterprises conditioned on partial self-funding and possible other compliance-related commitments, since lack of funding appears to be a significant constraint affecting progress on remediation among some enterprises

## **2. Ensure OSS is a balanced intervention – people, process, policy, and technology**

- Plan interventions to engage business associations on need to reinforce safety checks within licensing process – drawing on lessons learned within Remediation Coordination Cell (RCC)
- Beware of differences in the objectives of BIDA and ILO – the former to make licensing simpler, faster and the other to ensure safety issues are addressed prior to licensing and ensure that there are safeguards in the “simplified” licensing processes to prevent factories with serious safety concerns from receiving/renewing their license.
- Limit programme investments in equipment and software -use available government money for technical aspects and focus on people and process dimensions which align with ILO strengthens and value added.

## **3. Strengthen RMGP II interventions to build labour administration capacity to set inspection priorities and implement holistic strategies to improve compliance**

- Build on the success of and continue to refine LIMA with emphasis on advanced reporting to support decision-making
- Build DIFE capacity to analyse and use LIMA data to set inspection priorities
- Identify high priority post-Covid-19 compliance issues and build DIFE capacity to monitor and follow-up on these issues with multi-pronged strategy – education, communication, enforcement
- Support implementation of priority Gender Road Map activities
- Reinforce labour inspection expertise on RMGP II team
- Strengthen synergies with BWB on labour inspector capacity-building
- Integrate constituents in action programs to address post-Covid 19 compliance/safety issues

## **4. Make BWB more visible and relevant to national level RMG stakeholders**

- Continue and reinforce interventions addressing Covid-19 related challenges facing industry: continue tailoring factory level advisory services to Covid-19 related issues
- Consider taking a stronger, more public position responsible business practices (brands purchasing practices) and continue contributing to effective brand/supplier dialogue
- Reinforce capacity building interventions involving ILO constituents – DIFE, Employers' Associations, Trade Unions
- Develop strategy to scale/sustain successful gender intervention strategies: GEAR, Mothers-at-Work, Sexual Harassment Prevention
- Contribute to national debate on RMG sustainability using BWB experiences and data showing linkages between social compliance and productivity
- Develop PMP indicators that measure progress on influencing agenda and on exit strategy

## **5. Build ILO post Covid-19 strategy to support RMG sector recovery using “cluster approach”**

- Revise current programme workplans based on sector wide theory-of-change

- Develop new programmes based on sector wide theory-of-change
- Strengthen linkages between factory-level experiences, data and policy advocacy

**6. Capitalize 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**

- Areas that would benefit from greater involvement of constituents in consultation and validation include the OSH NPA, the ISU concept and implementation strategy, and the ILO RMG cluster strategy

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**7. Strengthen overall project management and coordination**

- Review planned down-scaling of project personnel to keep key personnel on longer
- Conduct more regular stock-taking exercises (example January 2020 analysis), especially to adapt existing strategies to Coronavirus-induced industry challenges
- Strengthen cooperation between RMGP II and BWB management teams by building in more synergies in intervention areas of shared interest – LI capacity building, OSH management



## 1. Introduction

The evaluation office of the International Labour Organization (ILO) commissioned an independent mid-term evaluation (MTE) of the two main complimentary ILO programmes aimed to improve working conditions and enhance the competitiveness of the ready-made garment (RMG) sector in Bangladesh:

1) Improving Working Conditions in Bangladesh's Ready-Made Garments sector Phase II (RMGP II, 2017-23),

2) Better Work Bangladesh-BWB and associated projects (funded through the RMGP-II and additional funding sources).<sup>3</sup>

This report presents the evaluation's principal findings, conclusions, and recommendations.

### 1.1 Context

Bangladesh is the world's second-largest clothing exporter, with more than 4,600 garment factories employing an estimated 4.1 million workers, making clothing for consumers mainly living in Europe, the United States, and Canada. Ready-made garments comprised about 84 percent of Bangladesh's total exports worth \$34 billion in the 2018-2019 financial year, according to data posted on the website of the trade body, Bangladesh Garment Manufacturers and Exporters Association (BGMEA).<sup>4</sup>

Following the Tazreen factory fire in 2012 and the collapse of Rana Plaza in April 2013, which together killed nearly 1,250 workers, international and national stakeholders came together through various initiatives to improve workers' safety in Bangladesh's export-oriented RMG sector. In 2013, the European Union, the United States, ILO and the Government of Bangladesh signed the Sustainability Compact to promote continuous improvements in labour rights and factory safety in the Ready Made Garment (RMG) industry. The Government of Canada joined the Compact in 2016.<sup>5</sup>

In the years following the accidents, international brands and government trading partners invested significant resources in conducting building assessments. Three initiatives, the Accord on Fire and Building Safety in Bangladesh (Accord), the Alliance for Bangladesh Worker Safety (Alliance) and the Government of Bangladesh's National Initiative (NI) carried out inspections reaching nearly 3,800 factories. The same initiatives also launched processes to remediate the

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<sup>3</sup> This mid-term cluster evaluation concerns the second phase of Improving Working Conditions in Bangladesh's Ready-Made Garments sector (RMGP II). RMGP II, like the programme's first phase, includes a component on Better Work Bangladesh (BWB). BWB received other funding streams in addition to the RMGP II programme. This evaluation covers all BWB activities funded through RMGP II as well as other funding sources.

<sup>4</sup> <http://bgmea.com.bd/bgmea/investment-trade/rmg-sector/>

<sup>5</sup> [https://www.ilo.org/dhaka/Whatwedo/Publications/WCMS\\_658138/lang--en/index.htm](https://www.ilo.org/dhaka/Whatwedo/Publications/WCMS_658138/lang--en/index.htm)

faults identified during inspections and to strengthen the capacity of national stakeholders to address some of the root causes of the industry's poor safety record.<sup>6</sup>

Bangladesh has been an active ILO member state since 1972. The ILO opened a country office in 1973, cooperating with the Government of Bangladesh (GOB), workers and employers' organisations to promote decent and productive employment opportunities for both women and men. A significant proportion of ILO's recent technical cooperation activities in Bangladesh have focused on enhancing working conditions and labour rights in the ready-made garment (RMG) sector.<sup>7</sup> The ILO implemented the Programme on Improving Working Conditions in the Ready-Made Garment Sector funded by Canada, the Netherlands and the United Kingdom from October 2013 to June 2017. The programme focused on building and fire safety assessments; labour inspection reforms; awareness on occupational safety and health (OSH); rehabilitation and skills training for Rana Plaza survivors and the launch of Better Work Bangladesh (BWB), a partnership between the ILO and the International Finance Corporation, (IFC). In July 2017, ILO launched a programme second phase which was designed to build on and enhance the first phase's positive outcomes.

## 1.2 Programme Overview

### Improving Working Conditions in Bangladesh's Ready-Made Garments sector Phase II (RMGP II)

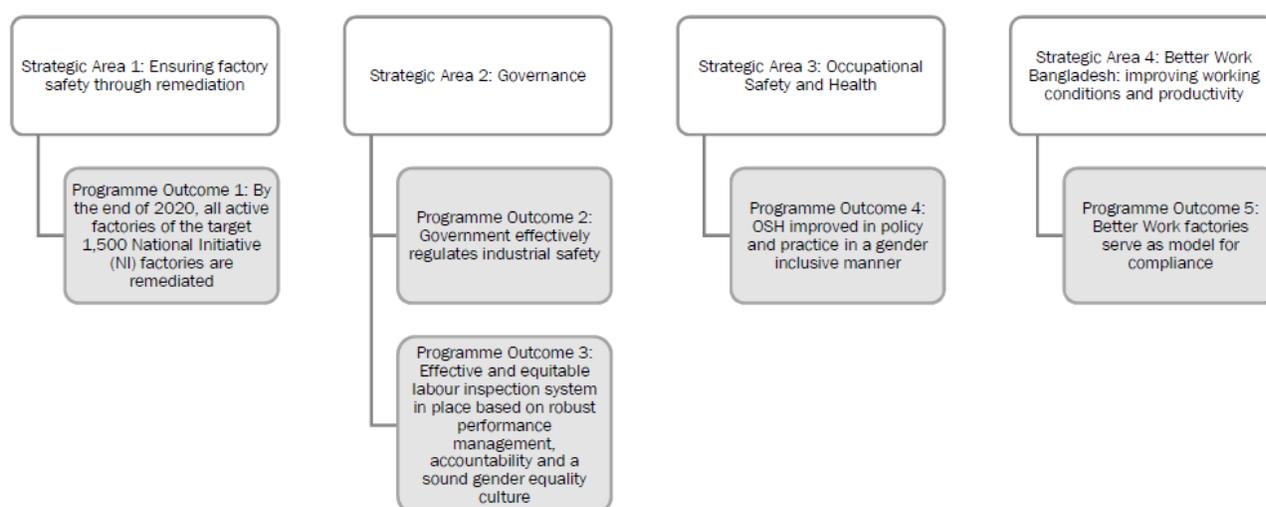
The second phase of RMGP (RMGP II 2017-2023) is a USD 24.5 million, six-and-a-half-year programme designed to improve the working conditions and safety standards in the RMG sector of Bangladesh. RMGP II works in four strategic areas: ensuring factory safety through remediation, governance building, improving OSH and BWB and aims to achieve five intermediate outcomes as outlined below:

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<sup>6</sup> [https://www.ilo.org/dhaka/Informationresources/Publicinformation/features/WCMS\\_733334/lang--en/index.htm](https://www.ilo.org/dhaka/Informationresources/Publicinformation/features/WCMS_733334/lang--en/index.htm)

<sup>7</sup> <https://www.ilo.org/dhaka/lang--en/index.htm>

Figure 1 RMGP II Strategic programme areas and outcomes



## Better Work Bangladesh (BWB)

Better Work, one of the ILO flagship global programmes, aims to improve working conditions in the garment industry and make the sector more competitive. It is currently active in nine countries and in over 1700 factories.<sup>8</sup> Launched in Bangladesh in 2014 with RMGP phase one and other funding, the programme works with diverse stakeholders including government, global brands, national industry associations and factory owners, and unions and workers. BWB's 2018-21 strategic phase set three overarching objectives:

1. Improve working conditions in factories with a focus on industrial safety.
2. Support a policy and business environment that protects workers' rights and boosts competitiveness.
3. Empower women, reduce sexual harassment and close the gender pay gap.

During the RMGP II implementation period (July 2017 – December 2021) BWB planned to expand programme services to 400 factories. BWB factory-level services include:

- Guided self-diagnosis to support factories to identify social compliance related issues and priorities within their factory<sup>9</sup>
- Establishment of a bipartite worker management committee to improve workplace communication and cooperation
- Learning services – advisory services, industry seminars and training courses
- Compliance assessments with international and national labour standards and laws

<sup>8</sup> <https://betterwork.org/>

<sup>9</sup> BWB learning and assessments cover a variety of issues including child labour, discrimination, forced labour, freedom of association, collective bargaining as well as national labour law regulations on compensation, contract and workplace relations, occupational safety and health, and working hours.

During the period 2017 to the present, BWB implemented three sub-programmes that are included in this midterm evaluation. These projects are Mothers@Work, the Gender Equality and Returns (GEAR) initiative and Strengthening social dialogue in GAP factories in Bangladesh. Table 1 provides an overview of these programmes.

*Table 1 BWB sub-programmes*

Subprogramme	Description
Mothers@Work	Mothers@Work is partnership between UNICEF and BWB to support the rights of working mothers and their children.  US\$ 263,695 Jun 2018 – Aug 2020
Gender Equality and Returns (GEAR) initiative	Launched in 2016, GEAR is a partnership between the IFC and BWB that aims to increase women worker’s access to supervisory positions in RMG factories.
Strengthening social dialogue in GAP factories in Bangladesh	A GAP Inc. and ILO joint initiative to strengthen social dialogue and industrial relations in all factories that Gap Inc. sources from in Bangladesh.  US\$ 500,000 Jan 2019 – Dec 2021

### 1.3 Theory of Change

RMGP II and BWB and its associated sub-projects aim to contribute to improved competitiveness in the RMG and other industrial sectors in Bangladesh by promoting safe and decent working conditions. The theory of change (TOC) of RMGP II and BWB is presented in the diagram below. To achieve safe and decent working conditions, the programme postulated progress was needed in four areas:

**Remediation of existing safety issues:** Between 2013–2017, with support from the ILO, the Ministry of Labour and Employment (MOLE) Department of Inspection for Factories and Establishments (DIFE) conducted fire, electrical and structural safety audits of 1,549 National Initiative<sup>10</sup> RMG factories. To contribute to safe and decent working conditions in these factories, RMGP II planned to provide assistance to MOLE’s Remediation Coordination Cell (RCC), a temporary structure, to put in place and implement a protocol for supporting and monitoring the remediation of the safety problems identified by the audits. As part of its support, RMGP II planned to facilitate NI factory access to financing for remediation activities by raising awareness about financing programs. Through these activities and others, the ILO aimed to contribute to building broader capacity to promote and monitor industrial safety in Bangladesh, including by facilitating the creation of a permanent industrial safety unit within DIFE.

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<sup>10</sup> After the Rana Plaza factory disaster, the Alliance for Bangladesh Worker Safety and the Accord on Fire and Building Safety in Bangladesh were signed. The Accord was an independent and legally-binding agreement between global brands, retailers and trade unions to build a safe and healthy Bangladeshi RMG industry. The Alliance is a legally-binding, five-year commitment to improve safety in Bangladeshi RMG factories. Later, the Bangladesh government, supported by the ILO formed another platform – the National Initiative (NI) – for RMG factories that were not part of the Accord and Alliance to improve their safety standards. A total 1,549 garment factories beyond the Accord and Alliance inspections were inspected by the NI.

**Strengthening of labour governance structures:** In addition to fixing already identified factory safety problems, RMGP II postulated that achieving safe and decent working conditions required strengthening the capacity of national regulatory bodies with an industrial safety mandate, especially the labour inspectorate. Under this component of the RMGP II TOC, ILO highlighted the need for more effective coordination between various GOB regulatory bodies charged with licensing factories<sup>11</sup> as well as continued capacity building for DIFE in areas including labour inspector training, inspection tools and standard operating procedures, data collection management and worker complaints handling.

**Improving OSH policies and practices:** RMGP II also highlighted the need to continue efforts to improve OSH policies and practices. At the policy level, the programme planned to assess national OSH regulations and policies and support the development of a National Plan of Action on OSH. At the level of practice, RMGP II planned to support national awareness raising activities and strengthen factory safety committees' capacity to ensure safe working conditions at the factory level.

**Improving working conditions/increasing productivity:** RMGP II and BWB TOC intersect under the fourth component on improved working conditions and increased productivity. BWB contributes to safe and decent working conditions in its member factories through core services aimed at improving factory compliance with international labour standards and national labour laws. In addition, BWB aims to engage industry stakeholders such as industry associations, brands and buyers to support responsible business practices. The RMGP II TOC highlights that BWB will contribute to broader improvements in the RMG sector by modelling how to achieve compliance improvements at the factory level and to promote broader policy improvements through research and sharing lessons learned with national and international stakeholders as part of its influencing agenda.

**Gender mainstreaming:** Recognizing that women make up a significant proportion of the RMG workforce in Bangladesh<sup>12</sup> and that men and women face some common but also some unique decent work challenges, RMGP II developed specific strategies to make policies and regulations more gender responsive as well as to promote women workers' voice and representation, maternity rights, and health and safety issues at all levels within regulatory bodies, the labour inspectorate, employers and workers organizations and in factories.

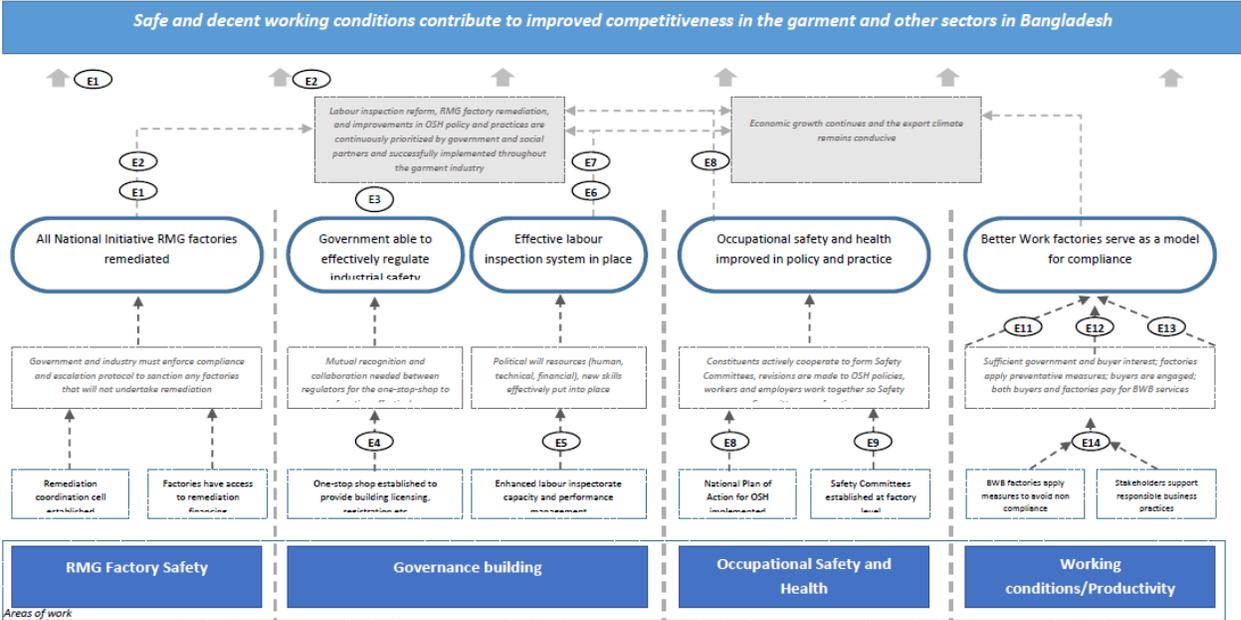
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<sup>11</sup>Public agencies with industrial safety related mandates include: Bangladesh Economic Zones Authority (BEZA), Bangladesh Fire Service and Civil Defence (BFSCD), the Dhaka Capital Development Authority known as RAJUK, and the Chattogram Development Authority (CDA), among others.

<sup>12</sup> Women make up between 50 and 60 percent of Bangladesh's workforce, according to the RMGP II Gender Action Plan.

Figure 2 RMGP II Theory of Change

Theory of Change



## 2. Evaluation Overview

### 2.1 Evaluation Purpose, Scope, Users and Objectives

To promote accountability and inform intervention strategies for the remaining implementation period of RMGP II and ongoing BWB activities, ILO commissioned an independent mid-term evaluation of RMGP II and BWB covering implementation from July 2017 and April 2020. The evaluation’s goal was to review the progress made toward achieving intended results and outcomes, identify lessons learned, and recommend possible programmatic adaptations during the programmes’ final implementation period. The mid-term evaluation draws on RMGP II performance data as well as qualitative and quantitative data collected from programme stakeholders and documents.

**Rationale for Cluster evaluation:** This evaluation used the cluster approach, a pro-active effort by the ILO driven by its new evaluation policy which aims to facilitate higher level analysis and recommendations as well as to potentially save resources, among other reasons. The approach, which was agreed upon by programme donors, was justified by the programmes’ shared objectives and in some cases, management structures and intervention strategies.

The evaluation’s main users include the RMGP II and BWB programmes, the ILO country office (CO) and regional and global technical support teams, ILO tripartite constituents in Bangladesh and other programme implementing partners, programme donors and other stakeholders endeavouring to improve safety and overall working conditions in Bangladesh’s RMG sector. In

addition to informing RMGP II and BWB implementation during its remaining time, ILO may use the results of the evaluation to guide future programming related to RMG supply chains.

The evaluation set out to answer the key evaluation questions outlined in the evaluation terms of reference (see Annex A) and listed in table 2 below:

*Table 2 Evaluation Questions*

<b>Relevance</b>
<p>To what extent did the intervention objectives and intervention strategies align with beneficiary, country, and institutional partners' needs, policies, and priorities?</p> <ul style="list-style-type: none"> <li>· What are current key stakeholders' interests and attitudes regarding worker safety?</li> <li>· Have the RMGP II and BWB programme strategies been responsive to changes in the business, socio-economic, political, and institutional environment?</li> <li>· To what extent are the programme strategies likely to adapt to expected technological developments in the industry (e.g. automation)?</li> <li>· To what extent has the programme adapted to the departure of the Accord and Alliance?</li> <li>· Do BWB services respond to the needs of the constituents to improve working conditions of the RMG sector?</li> <li>· To what extent is the role of BWB considered legitimate by stakeholders including international buyers? How does this affect the programme results, impact and sustainability?</li> </ul>
<b>Validity of design</b>
<p>To what extent are the RMGP II and BWB programme designs (objectives, outcomes, outputs and activities) and their underlining theory of change logical and coherent?</p> <ul style="list-style-type: none"> <li>· Are the intervention strategies of the two programmes' appropriate for achieving their stated objectives?</li> <li>· Do one or other or both programmes' logical framework/TOC need to be modified? If so how and why?</li> <li>· Are the indicators described in the logical framework and programme monitoring plans (PMP) useful for assessing the programmes' progress? Should they be modified to be more useful? If so how and why?</li> <li>· Were programme risks properly identified and assessed? Are there any other risks that should be highlighted and mitigated against?</li> </ul> <p>To what extent do the two programmes effectively mainstream international labour standards, tripartite mechanism and social dialogue, gender and non-discrimination, and environmental concerns in programme strategies and interventions?</p> <ul style="list-style-type: none"> <li>· The what extent have RMGP II and BWB interventions been consistent with promoting International Labour Standards, human rights- based approach and gender equality in Bangladesh?</li> <li>· Does the M&amp;E system of RMGP II and BWB collect sex-disaggregated data and monitor gender-related results?</li> </ul> <p>What are the lessons learnt in the design of the two programmes?</p>
<b>Coherence</b>
<p>Are RMGP II and BWB program approaches strategic and in line with the broad ILO action in Bangladesh (Decent Work Country Programme, gender mainstreaming and Strategic Programme Framework, Programme and Budget 2020-2021, Sustainable Development Goals and Centenary Declaration)?</p> <p>To what extent have RMGP II and BWB created synergies and interlinkages between the programmes' interventions and with other interventions carried out by ILO Dhaka, Government and social partners?</p> <ul style="list-style-type: none"> <li>· To what extent have RMGP II and BWB coordinated with other actors working in the RMG sectors of Bangladesh. Have the programmes' interventions complemented and/or harmonized with other industry initiatives?</li> </ul>

<ul style="list-style-type: none"> <li>· To what extent have other actors' interventions and policies either supported or undermined RMGP II and BWB interventions, and vice versa. How might RMGP II and BWB increase synergies, reduce duplication of effort/resources and improve collaboration with other actors?</li> </ul>
<p><b>Intervention progress and effectiveness</b></p> <p>To what extent have planned programme outputs been achieved, in relation to the original programme document, logical framework, performance monitoring plan, and work plans?  What obstacles were encountered in programme implementation?  How effective was the programme at stimulating interest and participation of programme partners at the micro, meso and macro levels?</p> <ul style="list-style-type: none"> <li>· To what extent were the constituents able to fulfil the roles expected in the programme strategies?</li> <li>· To what extent did the programmes adequately address the capacity challenges?</li> </ul> <p>What effects (expected/unexpected) are the interventions likely to have on power relations between women and men, and on women's empowerment?</p>
<p><b>Efficiency of resource usage</b></p> <p>Were resources allocated/used strategically to achieve programme outputs and outcomes?</p> <ul style="list-style-type: none"> <li>· Were activities completed on-time/according to work plans? If not, what were the factors that hindered timely delivery? Were the estimated timeframes adequate to achieve the intended outcomes?</li> <li>· To what extent were the programme activities cost-effective? What level of the programme activities (individual, institutional, systemic) were most or least cost-effective?</li> <li>· To what extent have the two programs leveraged partnerships (with constituents, national institutions, and other UN/development agencies) to enhance the projects' efficiency?</li> <li>· To what extent did the distribution of resources between activities and staff/administration optimize resource use? Could something be done differently to achieve greater efficiency? If so what?</li> <li>· Did the programme take measures taken to ensure/improve efficiency? If so, how effective were these measures?</li> </ul> <p>Were resources allocated strategically to achieve gender-related objectives?</p>
<p><b>Effectiveness of management arrangements</b></p> <p>To what extent have programme human resources been adequate in number, appropriately skilled, and effectively managed to fulfil the programme plans?  To what extent were governance and oversight arrangements effective to support the achievement of results?</p> <ul style="list-style-type: none"> <li>· Have the programmes received adequate administrative, technical and- if needed- political support from the ILO country office, regional technical specialists, and the responsible technical unit at headquarters, including M&amp;E experts?</li> <li>· Were programme governance arrangements with the funding partners, tripartite constituents, and other partners appropriate and effective?</li> </ul> <p>To what extent did programme managers capitalize on the programmes' M&amp;E systems for learning and use M&amp;E outputs to improve programme effectiveness?</p> <ul style="list-style-type: none"> <li>· How effectively did the programme monitor programme performance and results?</li> <li>· To what extent was results-based management implemented in the programme?</li> <li>· What, if anything, could be done to improve the programmes' M&amp;E systems?</li> </ul> <p>Does the programme team and the backstopping CO team have adequate gender expertise? Was technical backstopping sought and received from gender specialists when needed?</p>
<p><b>Impact orientation</b></p> <p>To what extent have programme interventions generated significant positive or negative, intended or unintended, higher-level effect? How likely are they to generate significant higher-level change in the future?</p>

- To what extent have the RMGP II and BWB initiatives contributed to progress toward the specific higher goals articulated in the United Nations Sustainable Development Goals (SDG), the Decent Work Country Program, and/or the Bangladesh national tripartite plans? If so, how have the interventions made a difference so far (social, environmental, and economic effects of the intervention)? Is stakeholder feedback consistent with other research / impact assessments (including the impact assessment of Better Work)?

What are the main challenges in the enabling environment? How are these challenges affecting programme efforts to achieve policy, legislative and strategic change? What factors affect stakeholder buy in for creating an efficient and effective culture of industrial safety in the country?

What are the possible long-term effects on gender equality?

- How do the tripartite constituents and other partners view the ILO's newly adopted Convention on Eliminating Violence and Harassment in the World of Work (C190)? To what extent are the programmes supporting long term stakeholder action and engagement toward the Convention objectives?

### **Sustainability**

To what extent are the programmes' results likely to be sustained beyond the end of the programme (RMGP II) or strategic plan (BWB)?

- Have the two programmes developed a sustainability plan and exit strategy? If so, are the proposed plans appropriate to sustain programme results?
- Which programme results (financial, economic, social and environmental dimensions) appear likely to be sustained after the programme and how?

To what extent are the programmes addressing partners' concerns and needs regarding sustainability?

- To what extent have government and social partners been involved in the preparation of a sustainability plan?
- How do the partners perceive that programme results will be sustained in the short, medium and long term?
- What are the constituents' plans to incorporate and continue programme activities in the short, medium and long term?
- Are results anchored in national institutions? Can the partners maintain them financially at the end of the programmes?

## **2.2 Evaluation design and data collection methods**

The evaluation team, composed of one International Evaluator (Team Leader), one National Consultant (Co-Evaluator), and one national note taker and logistics assistant, conducted the evaluation from April to September 2020. The team adapted the evaluation methodology to coronavirus pandemic-related travel and safety restrictions. In the initial evaluation design, the team planned two data collection phases - the first phase was to be conducted remotely in April/May using online communication technologies and mainly focused on ILO personnel, donors and national level stakeholders to be followed by a second in-country phase later in the year, mainly focused on factory level stakeholders. After the end of the first phase (June 2020), ILO evaluation department (EVAL) in consultation with the evaluation team and programme managers, determined that all data collection would be conducted remotely considering continuing travel and public health restrictions. For the two data collection phases, the evaluators relied upon both qualitative and quantitative data collection methods including document review, key informant and group interviews, and online surveys. The lead evaluator also consulted RMGP II and BWB monitoring and evaluation data.

The evaluation complied with ILO's evaluation norms and standards and respected ethical safeguards described in the ILO's evaluation procedures in line with the United Nations (UN)

system of evaluation norms and standards as well as to the OECD/DAC Evaluation Quality Standards.

### **2.2.1 Sampling**

The evaluators collected data on the perspectives and experiences of all key stakeholder groups involved in the RMGP II and BWB programmes.

- ILO officials and implementing partner representatives (country office representatives, RMGP II and BWB programme managers, ILO regional offices and headquarters specialists, Bureau Veritas)
- Donors representatives (Governments of Canada, Netherlands, United Kingdom, and United States, UNICEF and GAP Inc.)
- Bangladesh government representatives (from the Ministry of Labour and Employment [MOLE], Bangladesh Investment Development Authority [BIDA],
- Workers' Organizations (IndustriALL Bangladesh Council [IBC] and National Coordination Committee on Workers Education [NCCWE])
- Employers Organizations' representatives (Bangladesh Employers Federation [BEF], Bangladesh Garment Manufacturers' and Exporters' Association [BGMEA], and Bangladesh Knitwear Manufacturers and Exporters Association [BKMEA])
- BWB buyers/retailers
- Other partners (IFC)
- Factory managers
- Factory workers

For key informant interviews, the team used purposeful sampling to select key informants with first-hand knowledge of the programmes. For evaluation online surveys, with assistance from the ILO programme management team, the evaluation team sent the online survey instrument by email to the entire stakeholder group population based on contact information in RMGP II and BWB databases and created the sample based on respondents who volunteered to fill in the survey.

For discussion groups with factory level stakeholders including NI factory managers and BWB factory managers and workers, the evaluation team mainly used stratified random sampling to choose participants. The team requested lists of factories in specific categories (active NI factories and BWB factories enrolled in Mothers@Work, GEAR and GAP social dialogue) and randomly selected 2-4 factories from each list. Programme managers supplied a short list of potential participants from each selected factory from which the evaluators selected the final discussion group participants. Two worker groups (GEAR, Mothers@Work) were all female, otherwise the team aimed to achieve gender balance among participants when possible. In addition to the factories selected randomly by the evaluation team, the ILO selected participants from active factory participation and safety committees (one discussion group for each committee type). Overall, the final sampling allowed the evaluators to compare the perspectives of different key stakeholder groups and cross-check and fill gaps in the programmes' reporting.

### **2.2.2 Key Informant Interviews**

The evaluators interviewed 65 individuals, 25 females and 40 males from various stakeholder groups. The evaluators interviewed informants individually or in small groups. They conducted

stakeholder interviews primarily in English using protocols adapted to each stakeholder group and featuring open ended questions. Table 3 below shows the distribution of key informant interviews by stakeholder group and sex. Annex B includes a list of persons consulted by the evaluation team.

*Table 3 Key Informant Interviews distribution by stakeholder group and sex*

Stakeholder Group	Total	Male	Female
ILO Bangladesh Country Office team and other ILO project managers	4	3	1
ILO regional and HQ specialists/managers	5	3	2
RMGP II Programme Team	13	8	5
BWB Programme Team	5	1	4
Ministry of Labour and Employment (MOLE)	10	9	1
Workers' Organizations	3	2	1
Employers' Organizations	8	7	1
Other Stakeholder Organizations	6	3	3
Donors	9	3	6
Brands	1	0	1
NI Factory Manager	1	1	0
<b>Total</b>	<b>65</b>	<b>40</b>	<b>25</b>

### 2.3.3 Factory Manager and Worker Discussion groups

The evaluation included nine discussion groups with factory level stakeholders, both managers and workers, with a total of 36 participants (18 males, 18 females). Table 4 provides an overview of the groups. Discussion with NI managers gathered participants' perspectives of factory safety issues and remediation processes and challenges. Discussion with BWB factory managers and workers collected participants' general perspectives on BWB and when applicable, the specific sub-programme in which the factory was enrolled. The team called the discussion group participants on their phones using online conference call technology. The discussion groups used discussion guidelines prepared in advance and were conducted in Bengali by the co-evaluator.

*Table 4 Discussion group participants disaggregated by stakeholder group and sex*

Discussion Group	Total Participants	Male	Female
NI Factory managers	4	4	0
BWB/Mothers@Work Workers	5	0	5
BWB/Mothers@Work Managers	4	4	0
BWB/GEAR Workers	4	0	4
BWB/GEAR Managers	4	3	1
BWB/GAP Social Dialogue Workers	5	2	3
BWB/GAP Social Dialogue Managers	2	2	0
BWB Participation Committee	4	2	2
BWB Safety Committee	4	1	3
<b>TOTAL Discussion group participants</b>	<b>36</b>	<b>18</b>	<b>18</b>

### 2.3.4 Online Surveys

The evaluation team conducted six short online surveys to supplement qualitative information gathered through interviews with quantitative and qualitative survey data. The surveys, which were hosted online with invitations to participate sent by email, collected respondent perceptions and level of satisfaction with RMGP II and BWB activities and services as well as perceived outcomes and challenges affecting outcomes. They used a variety of question types: multiple choice, Likert scales, ranking, and open-ended questions. Participation was voluntary and answers were anonymous. Table 5 summarizes the number and gender distribution of survey respondents as well as estimated response rates by survey<sup>13</sup>.

*Table 5 Number and gender distribution of online survey respondents by survey*

Survey	Total Respondents	Male	Female	Number of Survey Recipients	Estimated response rate
Active National Initiative Factory Managers	20	19	1	400	5%
Labour Inspector Management Application (LIMA) training Participant Survey	86	71	15	270	33%
DIFE Headquarter Deputy Inspector General	7	5	2	23	30%
Better Work Bangladesh Enterprise Advisors and Team Leaders	19	10	9	24	79%
Better Work Bangladesh Brand Partners	8	2	6	30	26%
Better Work Bangladesh Factory Managers	153	141	12	253	60%
<b>Total Respondents</b>	<b>293</b>	<b>248</b>	<b>45</b>		

### 2.2.5 Document Review

RMGP II and BWB programme managers provided an extensive selection of programme documents to the evaluation team which provided useful inputs for this report. The lead evaluator reviewed the following document types:

- Project documents: project proposal, work plan, M&E framework, progress reports, activity reports
- Project products: studies, manuals, and training modules
- Better Work annual compliance reports
- Secondary research

Annex C includes a full list of documents consulted.

<sup>13</sup> Response rates are estimated based on the number of email addresses to which the survey was sent minus emails that bounced back. The LIMA training participant survey was also posted in a facebook group. There are 634 active NI factories. Out of these, RMGP II has valid email addresses for about 400 factories. Approximately 280 labour inspectors attended LIMA training, however at the time of the survey

## 2.2.6 Evaluation Debriefs

At the end of first phase of data collection, the lead evaluator analysed available data and presented initial evaluation findings, conclusions, and recommendations to stakeholders in three half day sessions on 17, 22, and 24 June for ILO personnel, donors and ILO constituents, respectively. In each session, the lead evaluator presented preliminary evaluation results and invited feedback from participants which was reflected in this draft evaluation report.

## 2.2.7 Evaluation Limitations

**Potential bias:** The evaluation team was aware of potential bias risks in data collection. These potential biases included recall (accuracy of key informant recollections including their ability to distinguish between different ILO as well as other institution programmes in the same country), selection (potential that involvement of programme personnel in the selection of evaluation key informants could lean toward selection of individuals with favourable views of the programmes) and response (potential that key informants respond in ways that they think are expected and/or will favour follow-on support). To mitigate these biases, the evaluators interviewed a wide variety of stakeholders, some selected randomly from stakeholder lists. To the extent appropriate, the team asked similar questions to all stakeholders. Instances of divergent perceptions are noted in this report. The team probed informant answers to help facilitate accurate recollection and noted when stakeholders referenced contributions from other initiatives. Finally, the evaluators initiated all key informant interviews and the group discussion with information about the evaluation's learning objectives and key informant confidentiality protocols.

**Challenges of remote data collection:** The evaluation team's reliance on remote data collection-imposed challenges including key informants' access to internet and comfort participating in virtual discussion groups as well as audio quality. With the help of ILO personnel, the team mitigated these risks by preparing participants, choosing technology that was accessible, which included dialling participants into discussions on regular telephone lines when necessary, and having a backup plan when one technology failed. The challenge was the greatest with workers, all of whom participated in discussion groups via their personal telephone. The team organized worker discussion groups during non-working hours and each participant was briefed in advance on what to expect. However, discussion groups were smaller than what would normally occur had face-to-face focus groups been possible. ILO/EVAL developed guidance on carrying out evaluations during the Covid-19 pandemic in March 2020.<sup>14</sup>

**Survey representativeness and response rates:** The online surveys conducted by the evaluation team were not designed to be representative of the entire population. Survey response rates varied considerably, from 79 percent to 5 percent of survey recipients. Various factors may explain differences in response rates including potential respondents' access to their emails as well as their willingness to participate. To increase responses, the evaluation team kept the surveys relatively short and potential respondents received at least one and in some cases

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<sup>14</sup> These guidelines on evaluation during the pandemic can be found here: [https://www.ilo.org/wcmsp5/groups/public/---ed\\_mas/---eval/documents/publication/wcms\\_744068.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_744068.pdf)

several reminders requesting participation. Additional information about survey respondents is provided in the finding section of this report.

**Scope of evaluation relative to time and resources:** The combination of larger than number of interventions to assess and many evaluation questions to answer posed challenges related to the depth of analysis that was possible, given time and resource limitations. Future cluster evaluations may consider focusing the evaluation on a smaller number of strategic issues/questions.

## 3. Findings

### 3.1 Relevance and Design Validity

To evaluate RMGP II and BWB relevance and design validity the evaluators assessed the extent RMGP II and BWB aligned with ILO constituents' and other key stakeholders' needs and priorities. The team also assessed the extent the programmes' intervention strategies aligned with RMGP II and BWB objectives, accounted for known risks and adapted to emerging risks. This section also analyses the extent that ILO cross-cutting priorities like promoting respect for international labour standards, gender equity and environmental concerns were considered in programme design. Finally, the evaluators analyse feedback on the usefulness of programmes' monitoring frameworks.

#### 3.1.1 Programme alignment with ILO constituents needs and priorities

RMGP II objectives and strategies largely align with MOLE needs and priorities. Based on feedback from government informants, seven years on from the Rana Plaza disaster, maintaining and/or improving safety standards in RMG factories remains a high priority. One MOLE official underlined Bangladesh's ambitions to expand its industrial capacity and noted, "*In the future we need to focus on safety issues. There is no alternative.*" RMGP II component on building the capacity of the labour inspectorate was likewise welcomed. One official remarked, "*Particularly after Rana plaza, our priority has been strengthening the inspectorate.*" Moreover, the programme aligns with MOLE objectives outlined in the Labour Inspection Management Reform Roadmap, developed in 2014 and updated in 2016. Among the priorities in the Roadmap are the implementation of IT systems to support the labour inspectorate in its work, an objective largely in line with RMGP II support for the Labour Inspection Management Application (LIMA).

RMGP II and BWB coherence with national policy documents was also evident, based on document review. 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 endorsed by ILO tripartite constituents including the Bangladesh Sustainability Compact<sup>15</sup> and the Decent Work Country Programme 2017-2020 (DWCP).<sup>16</sup> In addition, the GOB's Vision 2021 and

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<sup>15</sup> The Compact is built on short- and long-term commitments related to three inter-linked pillars: 1) respect for labour rights; 2) structural integrity of buildings and occupational safety and health; and 3) responsible business conduct.

<sup>16</sup> DWCP priority two is on the promotion of safe and clean working environment for all workers and in compliance with core international labour standards.

the Seventh Five Year Plan (2016–2020) include a major focus on the RMG sector as leader in the export growth strategy. Relevant garment related objectives in the Plan include: Fire safety, especially in the garment sector, addressing gender bias and its impacts on female workers and protecting labour rights to organize and strive for decent wages and safe working conditions.

### ILO constituents' level of satisfaction with RMGP II

Although all ILO constituents broadly affirmed that the issues addressed by RMGP II and BWB were important, their satisfaction with the programmes varied. Government representatives expressed high levels of satisfaction with RMGP II efforts on remediation, OSH policy and labour inspectorate capacity building. Workers and employers' organizations representatives were not satisfied overall, mainly with their levels of participation in project implementation and extent their members benefited from capacity building. One employer organization representative indicated, *"Our involvement in RMGP II has been extremely limited. It basically worked with the public sector.... none of our suggestions were included in the second phase."* A workers' organization representative noted the ILO's influence with government and factory owners and emphasized, *"ILO should concentrate more on workers."*

### BWB stakeholders' perceptions of programme relevance and level of satisfaction with services

BWB was largely unfavourably perceived by national level ILO constituents. Based on key informant interviews, employers' organization representatives perceived BWB as another brand-led initiative and an added cost of doing business. The informants highlighted continued audit duplication and did not perceive BWB to be contributing to any significant improvement in factory productivity and profitability. Government and employers both highlighted relatively low rates of factory uptake as a sign of the programmes' limited appeal.

In contrast to their national level association colleagues, employer representatives at the factory level expressed mostly positive views of BWB services based both on BWB factory manager survey data<sup>17</sup> and discussion group participant feedback. Based on survey results, 95 percent of respondents perceived that participation in BWB had been useful to improve compliance with national and international labour laws and standards in their factory. Two thirds of respondents rated BWB services excellent or very good while only five percent gave BWB an unsatisfactory rating. Factory manager discussion group participants, while largely satisfied with BWB services, highlighted a few ways BWB could meet their needs better including by ensuring better alignment between enterprise advisor's and assessors' advice on needed compliance improvements, updating and adapting training to factories specific needs, and taking a more "practical" or less "theoretical" approach to measuring compliance.

One factory manager remarked on a shift in his/her own views before and after joining the programme, *"To be very frank – I have been in the industry for 14 years. I never wanted any kind of ILO activities in my factory. After getting engaged with BWB, my views changed. I think this*

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<sup>17</sup> The BWB factory manager survey received 152 responses (140 males, 12 females). The breakdown of respondents' management role was compliance manager (57 percent), general manager (16 percent), human resource manager (13 percent), owner/managing director (one percent), and other – mainly compliance and HR personnel (13 percent). About 44 percent of the factories represented in the survey joined BWB in 2017 or before, 45 percent joined in 2018–2019, and 10 percent in 2020.

*will happen more and more.*" Another factory manager said, *"We have benefitted from BWB - They bring transparency and help in our improvement efforts...There are downsides as well. There are brands which do not recognize BWB audit...Multiple audits create problem."* On the issue of audit duplication, an important concern to factory managers, 52 percent of survey participants indicated that the number of social compliance audits by brands/buyers had been reduced since the factory joined BWB, 30 percent said the number was unchanged while 5 percent indicated an increase. Better Work personnel highlighted ongoing efforts by the ILO to unify audit frameworks in collaboration with the Social and Labour Convergence Programme. The former also highlighted that while progress was being made, the level of trust between Bangladesh suppliers and brands and buyers negatively affected some BWB brand partners' willingness to stop audit duplication.

Workers' representatives<sup>18</sup> cited an uptick in cooperation with the programme. One worker organization representative said, *"BWB is doing better increasingly. They work on health and safety and gender issues."* However, one worker representative voiced strong objections to BWB's promotion of participation committees, which s/he perceived to be management controlled, an opinion also voiced by one or two participants in factory worker discussion groups.

At the factory level, workers' opinions regarding BWB were largely favourable. Most workers noted with appreciation BWB training programmes and support for the formation of participation and safety committees as well as the programme's emphasis on gender issues, including efforts empowering women workers to voice their concerns and improving facilities for working mothers. One worker perceived BWB presence in his/her factory had helped to prevent unrest, *"Due to the BWB [support for] social dialogue, we didn't have to face problems during factory closures and re-openings at the time of 'corona'. We were able to resolve workers grievances. Participation and Safety Committee members have learnt how to talk with management."* Workers suggestions for improvement included more frequent visits from BWB enterprise advisors and providing additional training to workers.

Based on one KII and the BWB brand survey, BWB brand partners are largely satisfied with BWB services. Seven out of eight survey respondents<sup>19</sup> rated BWB services as "satisfactory," one rated them "excellent." The same proportion of respondents reported that the decision to subscribe to BWB was made in the brand headquarters suggesting the programme aligned with the brand's overall strategy to ensure social compliance norms among their suppliers. One respondent noted, *"BWB is impacting business decisions in a positive way because of the [programme's] global credibility."* Three respondents highlighted that training and other collaboration with Better Work Global had been useful. Several respondents suggested ways BWB could be more responsive to their needs, including by setting intervention priorities based on "risk factors," making the STAR portal more user-friendly, giving additional ratings and information on zero

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<sup>18</sup> The sample of workers' organization representatives consulted by the evaluation team was relatively small.

<sup>19</sup> Eight brand representatives responded to the survey, six females and two males. All eight respondents described themselves as social compliance/sustainability managers. Three quarters of respondents reported they had covered Bangladesh for over three years, 12.5 percent for between one and three years and 12.5 percent for less than one year.

tolerance issues so that brands could be sure issues were properly identified and addressed, making suggestions on how brands can help the factories improve and integrating a “management system” perspective. One brand cited a steady increase in supplier numbers subscribing to BWB as evidence of their satisfaction with the programme.

### **3.1.2 Extent programmes’ design aligned with RMGP II and BWB objectives and accounted for known and emerging risks**

Document review and key informant feedback highlighted both strengths and weaknesses in RMGP II and BWB’s intervention strategy.

**Remediation:** Under the remediation strategic area (SA1), RMGP II planned to support DIFE on the development and implementation of remediation compliance and escalation protocol and facilitate access to information about remediation financing by NI factory managers. Nearly all evaluation informants agreed that after investing in NI factory safety audits in the first phase of RMGP (audit of 1549 factories completed in 2015), ILO and DIFE follow-up was needed to support remediation of audit findings in phase two. However, several evaluation informants pointed to numerous challenges/risks affecting the likelihood that SA1 intervention strategies would achieve full remediation. Several ILO respondents noted that supporting the remediation of structural, fire and electrical safety issues was a speciality area not usually found within the ILO, although the programme reported it was able to recruit outside expertise and develop knowledge among existing national personnel as well as within DIFE. Feedback from multiple informants from nearly all stakeholder groups highlighted that NI factories management deficits, financial challenges, the large number of factories hosted in shared and rented buildings as well as the lack of brand leverage were significant obstacles to resolving all safety issues NI factories by the end of 2020<sup>20</sup> and may have needed additional intervention strategies to overcome. While anticipating that the remediation process could (and did) result in unsafe factory closures<sup>21</sup>, several key informants within the MOLE highlighted that preserving employment was an important government priority and that a flexible approach to remediation was required.<sup>22</sup>

**Governance:** Under the governance strategic area (SA2), RMGP II programme personnel highlighted the importance of strengthening licensing procedures to ensure the safety of new factories from the start. They reported that licensing as well as re-licensing involved numerous agencies with poor coordination track records, which allowed unsafe factories to find loopholes to obtain and renew their operating license. To address this contextual challenge, RMGP II designed interventions to bring the licensing process under a “one stop shop (OSS).” A strength of the OSS intervention design was it aligned with broader and high priority GOB policies to unify and simplify licensing and investment procedures and eventually facilitated collaboration with the Bangladesh Investment Development Authority (BIDA) during the implementation phase. Based on key informant feedback, collaboration with BIDA, an agency directly under the Prime

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<sup>20</sup> In its original and first revised workplans, the RMGP II planned that 100% of non-compliance items identified in NI factories Corrective Action Plans (CAP) would be remediated by December 2020.

<sup>21</sup> ILO reported that out of the 1549, only 664 factories are active NI factories. The large majority have closed.

<sup>22</sup> DIFE has extended deadlines for remediating CAP items several times. The original deadline was April 2018. During evaluation consultations, DIFE indicated that because of Covid-19, it was likely that deadlines would be extended again.

Minister's office, facilitated buy-in from the various agencies involved in factory licensing. More broadly, RMGP II highlighted that aligning programme digitization strategies with broader E-government programs was a good practice because it achieved high level buy-in and, in the case of LIMA, lifted the profile of labour inspection reforms.<sup>23</sup>

Risks associated with the intervention strategy not identified in programme documents include potentially conflicting priorities – one key informant reported the main objective of the national OSS was to overcome delays in licensing and conjectured that in order to keep within the initiative's strict timelines, factories with safety issues might be allowed to operate with temporary licenses, potentially defeating ILO's objective of tightening controls. In addition, planned interventions are heavily focused on technological dimensions of the OSS (improving and unifying online platforms used by investors/factory owners), with relatively fewer interventions focused on building institutional capacity to inspect and enforce licensing requirements, although ILO programme personnel noted the latter is at least partially covered by RMGP II RCC capacity building strategies under SA1 as well as SA2 labour inspectorate capacity building interventions (see below).

Concerning planned interventions to build the capacity of the labour inspectorate, planned interventions appear to be largely align with how labour inspector's perceive challenges and needs. Based on survey results, labour inspectors perceived the most important challenges limiting their effectiveness to be: Lack of enforcement power (71 percent), insufficient logistical support for inspection (56 percent), lack of professional advancement opportunities (43 percent) and lack of specialized training (43 percent). On the latter point, respondents identified the following priority areas for additional labour inspection capacity building: OSH standards (60 percent), Bangladesh Labour Law (54 percent), handling worker complaints (46 percent) and mediating labour disputes (42 percent). These LIMA trainee survey<sup>24</sup> results suggest that RMGP II intervention strategies' design and inspectors' needs match in some important areas: training (inspector training planned under SA2), OSH focus (planned labour inspector capacity building interventions and OSH awareness raising and policy work in SA3), and the provision of logistical support (part of SA1 and SA2 interventions). Although not directly addressing labour inspector enforcement powers, the remediation compliance protocol (SA1 intervention strategy) set out DIFE's enforcement responsibilities clearly as well as when and how other stakeholders should intervene to enforce standards.

**OSH:** Under the OSH strategic area (SA3), programme managers and GOB key informants highlighted the component's multi-pronged approach, which included a mix of policy, integration with labour inspection capacity building (for example, sectoral OSH checklists, safety committee checklist), awareness raising (annual OSH day celebrations) and planned factory-level tripartite stakeholder interventions, as a design strength because it addressed factors affecting factory safety on several levels. One ILO official noted the component's intervention strategies aligned

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<sup>23</sup> For example, document review shows that the Minister of Finance highlighted LIMA success in his 2019 annual budget speech.

<sup>24</sup> Respondents were labour inspectors who received training on LIMA. Eighty-six respondents answered the survey, 71 males and 15 females. Fifty-six percent of respondents reported they had been part of the labour administration for four to nine years and 12.5 percent for over ten years. About a third of respondents had joined in the last three years.

well with promoting International Labour Standards (ILS) through national level work, for example supporting MOLE's development of the national OSH profile as well as paying attention to the importance of workers' participation in OSH improvements at the factory level.

**BWB:** Donors, programme personnel and brands perceived the global nature of the Better Work programme, which draws on good practices and lessons learned from other Better Work countries to be an important design strength. At the same time, several key informants likewise noted because of the many compliance initiatives that followed the Rana plaza disaster, BWB entered an already crowded “market” space, without an easily perceived, unique value proposition, a risk factor that may not have been initially fully assessed and addressed in the intervention strategy.

### Coronavirus pandemic: new unforeseen risks and extent of programmes' adaption

Phase one data collection for this midterm evaluation took place as the coronavirus pandemic was starting to have its devastating effects on Bangladesh's RMG industry with potentially long-term effects on the business and economic environment. In May 2020, the BGMEA website reported USD 3.17 billion worth of RMG orders had been cancelled or suspended, affecting 2.27 million workers. The GOB predicted the effects the global public health crisis would lead to 15 percent drop in exports in 2020.

Evaluation key informants from all stakeholder groups highlighted many new risks to the sector which are summarized in Table 6 below. During evaluation consultations, workers, labour inspectors, employers, and brand representatives cited safety concerns – safe transportation, access to personal protection equipment (PPE), procedures to ensure social distancing and good hygiene. Labour Inspectors highlighted the need for risk pay, guarantees for care in case of illness, the need for OSH guidance as well as strict penalties for non-compliance of pandemic-related OSH provisions. One brand survey respondent listed his/her priorities: clear guidance on how to apply Covid-19 OSH guidelines, guidance on wages payment, employment contract, worker lay off and retrenchment regulations and more frequent updates from BWB. Beyond the specific effects of the pandemic on industry, MOLE key informants highlighted broader concerns with loss of employment and the need to re-purpose workforce.

*Table 6 Coronavirus pandemic risks affecting ILO RMG interventions*

Risk area	Potential risks
Worker health and well-being	<ul style="list-style-type: none"> <li>· Job loss, non-payment of wages</li> <li>· Potential of virus spread among workers</li> <li>· Acceleration of automation with larger, negative consequence on women workers</li> <li>· Other gender specific risks: Women's disproportionate loss of employment, opportunities for harassment in re-hiring decisions, pregnant women's health concerns</li> </ul>
Industry	<ul style="list-style-type: none"> <li>· Consolidation/shrinking of industry</li> <li>· Cancelled, non-payment or reduced payment of orders</li> <li>· Less focus on compliance</li> </ul>
National economy	<ul style="list-style-type: none"> <li>· Rising unemployment</li> <li>· Limitations of national social protection schemes</li> </ul>

With many of the immediate risks at the factory level, BWB reported leading various initiatives to address emerging needs. Key elements of BWB response as of June 2020 were: development of Covid-19 specific OSH guidelines and awareness raising materials to mitigate spread in factories<sup>25</sup>, adapting factory services to include virtual delivery, supporting factory initiatives to produce personnel protective equipment (PPE) to meet national demand, and collecting data on factory closures and its effects on the sector and on workers. RMGP II also reported developing Covid-19 guidelines for labour inspectors.

BWB as well as the CO communication team reported strategies to foster awareness and dialogue on the pandemics' effect on the industry including brand/buyer and supplier relationships. Programme personnel reported developing communication materials as well as responding to media requests to highlight the negative consequences of the pandemic on producers/workers. BWB and the CO also facilitated ILO tripartite constituent involvement in Global Garment Industry Call to Action.<sup>26</sup>

Stakeholder perceptions of RMGP II and BWB responses in April/May 2020 (during the first phase of data collection) were mixed. Some donors felt the ILO response was slow and not sufficiently proactive. MOLE officials expressed appreciation for Covid-19 OSH guidelines. In the phase two data collection, which focused more on factory level stakeholders, workers largely expressed satisfaction with the safety protocols in place in their factory.

Although both RMGP II and BWB programme managers were relatively quick to put in place business continuity plans, there was broad agreement among programme and donor personnel that RMGP and BWB logframes required comprehensive revision to account for emerging needs and risks, a process that was initiated during the evaluation period. One RMGP II manager remarked, *"Within the context of Covid-19, we have a lot of risks that affect the whole sector – already you can see factories closing down. I am not comfortable with "delayed activities" because that assumes things will go back to normal. I think we have to revise our logframe to be more realistic."* A BWB enterprise advisor opined, *"It [Coronavirus Pandemic] may have both positive and negative impacts on BWB's work. If enterprise advisors are not able to carry out their day to day job, planned work will be delayed. On the other hand BWB may take the responsibility to mobilize the industry post Covid-19 pandemic with the effective engagement of different stake holders."* Other Better Work personnel highlighted opportunities to develop online learning strategies, focus more on OSH management systems, and to strengthen social dialogue, especially to ensure factories followed national laws on worker retrenchment.

### **3.1.3 Extent of International Labour Standards, tripartite mechanism and social dialogue, gender and environmental concerns mainstreamed in programmes' design**

**International Labour Standards (ILS):** Based on document review, RMGP II and BWB logframe goals and objectives on promoting safe and decent working conditions reflect ILS throughout

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<sup>25</sup> Covid-19 Management Guidance April 2020 and footwear factories [https://betterwork.org/wp-content/uploads/2020/04/Covid-19-Management-Guidance\\_BWB\\_v2-2.pdf](https://betterwork.org/wp-content/uploads/2020/04/Covid-19-Management-Guidance_BWB_v2-2.pdf) and

<https://betterwork.org/portfolio/coronavirus-awareness-poster-bangla-from-better-work-bangladesh/>

<sup>26</sup> The call to action aims to generate action from across the global garment industry to protect workers' income, health and employment and support employers to survive during the Covid-19 crisis, and to work together to establish sustainable systems of social protection for a more just and resilient garment industry.

the programmes' design. RMGP II SA1-3 interventions address issues raised by Committee of Experts on the Applications of Conventions and Recommendations (CEACR) on Convention 81 (Labour Inspection Convention) and Convention 155 (OSH) including recommendations on the creation of an industrial safety unit, follow-up on fire and safety remediation, labour inspector handling wage and benefits -related grievances, and industrial accidents reporting. BWB's compliance checklist refers to both ILS and national labour laws. BWB considers fundamental principles and rights at work including child labour, forced labour, freedom of association and collective bargaining and non-discrimination to be zero tolerance issues.<sup>27</sup>

**Social Dialogue:** Both the RMGP II and BWB designs include intervention strategies to facilitate social dialogue at the factory level.<sup>28</sup> Although they are yet to be implemented, RMGP II includes interventions to build on its phase one promotion of factory safety committees. The programme also sought to strengthen the labour inspectors' role in ensuring the formation of active safety committees, based on the provisions of Bangladesh Labour Law, by developing an inspection checklist on this topic. BWB mainstreams social dialogue in its core service activities by facilitating the process for freely elected and active participation committees. In addition, in collaboration with GAP Inc, BWB and the ILO's Social Dialogue and Industrial Relations (SDIR) project are implementing trainings to improve collective bargaining and negotiation skills in GAP supplier factories (approximately 47 factories).

**Tripartite mechanism:** In May 2013, Bangladesh set up a high-level National Tripartite Committee (NTC) to monitor the implementation of a National Tripartite Plan of Action (NTPA) to ensure fire safety and structural integrity in the ready-made garment (RMG) sector. RMGP 1 and II programmes were designed to contribute to NTPA implementation. The committee, comprised of key RMG and knitwear industry stakeholders including government agencies, academic institution, employers' organisations, and trade unions, has met three times since 2017 based on document review. In addition, RMGP II also established a tripartite programme steering committee which has met twice since 2017. RMGP II personnel and constituents reported that ILO tripartite partners were consulted during RMGP II and BWB programme design stages but that tripartite consultations on some strategic outputs had been limited to date: the OSH National Plan of Action, plans to create an industrial safety unit within DIFE, and on the cluster approach to addressing labour standards in the RMG proposed by the CO (more details on these are provided later in this report).

**Gender:** In its first year of implementation, RMPG II developed a Gender Mainstreaming Strategy and Gender Action Plan which outlined interventions to identify and address gender dimensions in each strategic area of the programmes. In the same year, RMGP II modified its logframe and PMP to articulate gender mainstreaming objectives in programme outcomes, outputs and

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<sup>27</sup> <https://betterwork.org/portfolio/zero-tolerance-protocol/>

<sup>28</sup> Social dialogue is defined by the ILO to include all types of negotiation, consultation or simply exchange of information between, or among, representatives of governments, employers and workers, on issues of common interest relating to economic and social policy.

indicators. In addition, RMGP II included support for gender related research<sup>29</sup> and awareness raising including advocacy efforts related to Convention 190 on violence and harassment.

Decent work issues of specific concern to women workers in the garment sector such as maternity leave, sexual harassment, and women’s health issues crosscut BWB’s work on promoting factory compliance with national labour standards. In its first 2019 newsletter, BWB published a vision statement on gender equality<sup>30</sup> and highlighted four intervention areas to be embedded into its factory services, policy engagement activities, research and communications.

*Table 6 BWB Four Areas of Gender Integration*

<b>Prevention of Discrimination</b>	<b>Paid Work &amp; Care</b>
<ul style="list-style-type: none"> <li>· Prevention sexual harassment</li> <li>· Tackling recruitment and occupational discrimination</li> <li>· Bridging the gender wage gap</li> <li>·</li> </ul>	<ul style="list-style-type: none"> <li>· Pregnancy related healthcare and nutrition</li> <li>· Maternity protection</li> <li>· Breastfeeding and childcare</li> </ul>
<b>Voice and Representation</b>	<b>Leadership and Skills Development</b>
<ul style="list-style-type: none"> <li>· Representation of women workers in factories’</li> <li>· committees and trade unions, union federations, and employer organisations; voice in collective bargaining processes.</li> </ul>	<ul style="list-style-type: none"> <li>· Career opportunities in factories; leadership positions in governments, trade unions and employers’ organizations; financial literacy and household budget planning</li> </ul>

**Environment concerns/production technologies:** Neither RMGP II and BWB personnel nor programme documents reported direct interventions to address environmental concerns or changes in production technologies such as automation. Programme personnel reported that the ILO collaborates with development partners such as the IFC and GIZ who implement complementary programmes promoting “greener” factories and which provide guidance and funding to increase RMG factory production efficiency. RMGP II research touched lightly on the potential consequences of automation on employment, especially for women workers whose jobs are more likely to disappear. In addition, in May 2020 Better Work published a discussion paper<sup>31</sup> on obstacles to and potential implications of automation on production and employment in the garment industry in Bangladesh as well as other important producing countries.

<sup>29</sup> For example, the ILO and UN Women launched a joint study in 2017 to analyse trends of the gender composition of the RMG labour force and identify contributing factors and consequences on the relative position of women and men workers in RMG sector.

<sup>30</sup> Better Work aims for a society where women and men have equal and decent work opportunities, are free from gender-based violence and discrimination, and are able to access their rights, fulfil their potential and direct their futures.

<sup>31</sup> Discussion Paper 36: Automation, employment and reshoring in the apparel industry <https://betterwork.org/portfolio/better-work-discussion-paper-36-automation-employment-and-reshoring-in-the-apparel-industry/>

## 3.2 Coherence

In this section, the evaluation team assesses the extent that RMGP II and BWB's design and implementation was consistent with international and regional development and decent work frameworks and agendas. It also examines if/how the programmes fit with other ongoing ILO, Bangladesh development partners', and constituent programmes and activities, including the extent programme actions were coordinated with other initiatives to build synergies and avoid duplication of efforts.

### 3.2.1 Usefulness of programmes' logical framework and programme monitoring plans (PMP) for assessing the programmes' progress

The evaluation team's document review shows that both RMGP II and BWB monitoring and evaluation (M&E) approaches were comprehensive and applied results-based management principles. Both programmes documented their theory of change and developed comprehensive logical frameworks with a set of indicators to measure progress toward the achievement of programme outcomes and outputs. In addition, RMGP II developed a comprehensive risk matrix which included planned mitigation strategies. The RMGP II logical framework and related indicators were reviewed and updated at least twice between 2017 and May 2020.

Some key Programme Monitoring Plan (PMP) users (mainly programme staff and donors) perceived that M&E indicators and reporting could be improved. While noting that the reporting quality had improved since the first phase, a few programme managers and donor representatives suggested that existing indicators were not providing a full picture of RMGP II progress. One donor representative remarked, *"The logframe was difficult to translate into concrete results – how you measure success."* One programme manager offered a specific example of an indicator gap, *"For the Remediation Coordination Cell, the indicators are not indicating what is happening. Measuring the number of follow-up visits is not very useful. We need something in between the rate of remediation and number of visits."* One respondent also noted that while part of outcome and output formulation, gender dimensions were not always measurable such as in the case of RMGP II outcome indicator 3.2, "Improved gender responsive working conditions". However, M&E reporting included gender disaggregated data where appropriate.

Better Work Global and BWB managers reported programme indicators were too focused on quantitative indicators such as the number of factory subscribers and compliance assessments carried out, while lacking indicators and related information on more qualitative changes in BWB factories. One ILO official said, *"Having a lot of factories doesn't mean we have a deep impact in those countries. I would have preferred to focus on other changes rather than the numbers."* Based on document review, the evaluation team found no indicators measuring progress on BWB efforts to strengthen the national enabling environment or promote responsible business practices, even though these are strategic intervention areas.

### 3.2.2 Alignment with existing ILO and ILO constituents' international and regional agendas on decent work

Evaluation team document review shows RMGP II and BWB aligned with key international and regional agendas on decent work:

- **Sustainable Development Goals:** Goal 8 calls for “sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.” and highlights the importance of safe and secure working environments and achieving equal pay for work of equal value, as well as protecting labour rights.<sup>32</sup> Goal 5 aims to “achieve gender equality and empower all women and girls including by ensuring “women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life (Target 5.5).”
- **Multinational frameworks on sustainable supply chains:** Includes a variety of actions to be taken by government and responsible businesses to uphold ILS within global supply chains such as ensuring due diligence and remediation on the part of business and strengthening and enforcing national legislation on the part of producing and importing countries.<sup>33</sup>
- **ILO programme and budget (P&B) 2020-2021:** RMGP II is strongly aligned with objective 2 of the 2020-2021 P&B objectives, “International labour standards and authoritative and effective supervision” as well as Outcome 7, “Adequate and effective protection at work for all.”
- **ILO and ILO constituents’ recommendations articulated and validated in high level tripartite meetings:** The 2019 ILO Centenary Declaration for the Future Of Work adopted in June 2019 prioritized efforts to (1) strengthen labour administration and inspection; (2) achieve gender equality at work; (3) ensure Safe and healthy working conditions and (4) promote workers’ rights as a key element for the attainment of inclusive and sustainable growth.

### 3.2.3 RMGP II and BWB interlinkages with other interventions carried out by ILO Dhaka, Government and social partners

Evaluation team document review shows ILO RMG portfolio has strong thematic synergies. ILO programmes cover many key strategic areas: Building and Fire Safety, Labour Administration Reform, OSH, Social Dialogue, Labour Dispute Mediation and Grievance Handling, and social partner capacity building, Skills, Social Protection. Analysis of budget information suggests funding levels are not balanced across thematic areas of work. In addition, based on ILO official and constituent feedback, some gaps exist. Some examples of gaps cited by ILO and MOLE personnel included improving wage-setting mechanisms, improving safety standards in informal enterprises, and labour court reforms. Table 7 summarizes current ILO projects in Bangladesh’s RMG sector.

*Table 7 ILO project in the RMG sector in Bangladesh*

<p><b>Support the implementation of the Sustainability Compact – Phase II</b></p> <p><b>Goal:</b> Monitoring results relating to commitments of the Sustainability Compact for Continuous Improvements in Labour Rights and Factory Safety in the Bangladesh Ready-Made Garment and Knitwear Industry</p> <p><b>Budget:</b> \$150,000</p> <p><b>Implementation period:</b> 2017-2018</p> <p><b>Inclusive Business Policy for Disability inclusion in supply chains</b></p>
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<sup>32</sup> For example, SDG Target 8.8 sets out to protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.

<sup>33</sup> Key multilateral frameworks include the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration of Principles Concerning Multinational Enterprises and Social Policy.

<p><b>Goal:</b>  <b>Donor:</b> H&amp;M  <b>Budget:</b> \$30,000  <b>Implementation period:</b> 2019-2020</p>
<p><b>Strengthening social dialogue in GAP factories in Bangladesh</b></p> <p><b>Goal:</b> Promote social dialogue and harmonious industrial relations in fifty Gap supplier factories and vendors in Bangladesh  <b>Donor:</b> GAP  <b>Budget:</b> \$175,000  <b>Implementation period:</b> 2019- 2021</p>
<p><b>Mothers@Work</b></p> <p><b>Goal:</b> Support garment manufacturers to ensure enhanced maternity rights protection and support lactating mothers to follow breastfeeding best practice  <b>Donor:</b> UNICEF  <b>Budget:</b> \$263,000  <b>Implementation period:</b> 2018- 2020</p>
<p><b>Implementation of the national employment injury scheme of Bangladesh - A legacy to the Rana Plaza accident</b></p> <p><b>Goal:</b> Adoption of a sustainable national employment injury insurance (EI) scheme for workers employed in the formal sector in Bangladesh, starting with the ready-made-garment sector (RMG)  <b>Donor:</b> Germany, Federal Department for Economic Cooperation and Development  <b>Budget:</b> \$1,000,000  <b>Implementation period:</b> 2015-2018</p>
<p><b>Promoting Social Dialogue and Harmonious Industrial Relations in Bangladesh Ready-Made Garment Industry</b></p> <p><b>Goal:</b> Outcome 1: Sustainable improvement in social dialogue, workplace cooperation and grievance handling; (ii) Outcome 2: Sustainable and effective mechanisms for conciliation and arbitration are established; (iii) Outcomes 3: Enhanced capacities of employers' and workers' organizations to dialogue and prevent and resolve disputes including those of gender concerns.  <b>Donor:</b> Sweden and Denmark  <b>Budget:</b> \$6,910,000  <b>Implementation period:</b> 2015- 2020</p>
<p><b>Support to a national employment injury insurance scheme for Bangladesh workers of the ready-made garment and the supply-chain sectors and its extension</b></p> <p><b>Goal:</b> Support the political willingness of the Bangladesh government and social partners to adopt a national employment injury insurance scheme and to set up the public institution required for its implementation  <b>Donor:</b> Italy  <b>Budget:</b> \$217,000  <b>Implementation period:</b> 2014- 2019</p>
<p><b>Centre of Excellence for RMG to implement certified training within the national skills development framework of Bangladesh</b></p> <p><b>Goal:</b> Establish a replicable model of an industry driven training and support service Centre of Excellence, to meet the skilled labour force needs of the export oriented RGM industry  <b>Donor:</b> SIDA and H&amp;M  <b>Budget:</b> \$1,456,000  <b>Implementation period:</b> 2014- 2018</p>

Source: ILO Development Cooperation Dashboard

### Stakeholder feedback on ILO programme implementation synergies

Despite thematic synergies, several ILO, donor and government key informants perceived that the ILO was not optimizing implementation synergies, potentially duplicating efforts and missing opportunities to build on the other programme strengths. To address its own and others' concerns, the ILO Bangladesh CO had conducted internal consultations among RMG programme leaders and at the time of the evaluation, was finalizing plans for a new RMG cluster approach. As part of this approach, programme and CO personnel had developed a sector wide (versus an

individual programme) theory of change and were examining opportunities to create functional areas of expertise. For example, one ILO official highlighted plans to develop a cross-programme strategy on constituent training.

Several stakeholders remarked specifically on limited capitalization of synergies between RMGP II remediation, governance and OSH interventions and BWB. One ILO specialist remarked, *“Although part of RMGP II – BWB has been a separate program. That hindered us from making the interventions efficient – making the most of the donor resources.”* One donor likewise perceived uncaptured synergies, *“There is a need for a clearer narrative between the RMGP and BWB programmes. Better Work pilots a lot of things – may be the RMGP II can elevate these to the policy level.”* A MOLE official likewise remarked, *“Interesting the ILO developed checklists for Labour Inspectors and at the same time has developed BWB checklists. You would think there would be synchronization. Funny that both initiatives are backed by ILO.”*

RMGP II and BWB personnel, while noting the programmes’ size and complexity required that leaders’ focus on individual workplans, agreed that greater synergies are possible and indicated that they have been working on strengthening these, especially in the context of CO’s Covid-19 response. Potential synergies highlighted during evaluation interviews included greater leveraging of BWB factory level data to inform policy work, more collaboration between BWB and governance teams, particularly on labour inspector capacity building, and more capitalization of BWB factory level facilitation and training approaches, especially related to participation and safety committees and efforts to curb sexual harassment and violence in the workplace.

#### RMGP II and BWB collaboration with other actors working in the RMG sectors of Bangladesh

According to key informant interviews with programme personnel, MOLE officials, donors and ILO partner organizations (UNICEF, IFC), the RMGP II and BWB largely coordinated programme actions with other key players including with multiple other donor and brand-led initiatives. Several donors perceived that the ILO played a leadership role in efforts to promote safe and decent work in the RMG sector which facilitated coordination amongst various intervening organizations. Most key informants perceived limited duplication of efforts and cited examples of active coordination and collaboration including between:

- RMGP II remediation activities managers and donors with remediation financing activities (Japanese International Cooperation Agency [JICA], Deutsche Gesellschaft für Internationale Zusammenarbeit [GIZ], Agence Française de Développement [AFD])
- ILO and GIZ and Danish programmes with DIFE capacity building projects
- UN Women and United Nations Population Fund (UNFPA) on mainstreaming gender in labour issues<sup>34</sup>
- BWB and IFC (GEAR), UNICEF (Mothers@Work) and GAP and H&M on their supplier initiatives.

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<sup>34</sup> ILO/RMGP II and UN Women launched a joint study in 2017 to estimate women’s participation in the RMG sector and identify factors affecting women’s participation. Both ILO and UNFPA were collaborating with the MOLE on gender related strategies with few reported overlapping initiatives. ILO reported that UNFPA was developing an action plan with MOLE on combatting Gender Based Violence while the ILO developed a Gender Roadmap with DIFE.

One institutional partner underlined collaboration in Better Work factories and with the ILO country office (CO) on policy work. S/he asserted that Better Work's good reputation provided assurance that factory social compliance issues were being addressed, *"It helps us significantly with board approvals when we are funding Better Work factories."* An ILO programme manager highlighted similar synergies between other development partners in Bangladesh and RMGP's work on improving DIFE information management and transparency, *"LIMA has been taken as a good governance indicator for financing by World Bank. GIZ is also interested in rolling out the accident injury module of LIMA because they also see the usefulness of it."* Despite coordination, RMGP II programme managers reported absorptive capacity challenges because counterparts' large number of competing responsibilities and decision-makers frequent changeover.

Several key informants also highlighted RMGP II involvement in the development of the RMG Sustainability Council (RSC), the national initiative that took over Accord's factory workplace safety monitoring on June 2020. Key informants reported ILO/RMGP II contributed to dialogue on the roles and responsibilities of ILO tripartite constituents. Prior to the decision to create national initiatives, much of RMGP II work was designed to enable DIFE to assume responsibility for monitoring the Alliance and Accord safety. One DIFE official indicated that although this vision has evolved, RMGP II remediation capacity building remains relevant, *"DIFE has a mandate for safety issues and needs to be involved. We are ready to cooperate but within our mandate. DIFE is the final authority."* DIFE officials highlighted they would like more discussion on how DIFE will interact with the RSC.

### **3.3 Implementation progress, effectiveness, impact orientation, and sustainability**

This section includes an overview of RMGP II and BWB implementation strategies for each of its immediate outcomes, highlights results achieved to date, shares stakeholder feedback on project outputs, discusses issues around stakeholder selection and levels of engagement in project activities at country and regional levels, and discusses the challenges and opportunities that affected project implementation.

#### **3.3.1 SA 1: Ensuring Factory Safety through Remediation**

With assistance from ILO, in 2016 DIFE, together with other industry regulators, established the RCC to manage the remediation of NI factories fire, structural and electrical safety issues as identified in previous audits. RCC's mandate included both supervision activities to ensure that the defects were addressed, and assistance in developing and executing appropriate remediation plans.

Major activities planned under SA1 output 1.1 "A Remediation Coordination Cell established" included providing technical assistance to DIFE/RCC to establish an active case management system, institutional oversight mechanisms, and a remediation tracking system. ILO also planned to commission independent quality control of factory level remediation, deliver RCC personnel training and sponsor the development of a model factory design<sup>35</sup>. Under output 1.2, "Employers, workers and buyers are better equipped to support and sustain remediation

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<sup>35</sup> The model factory design activity, which planned to explore how to make factory structures more friendly to women workers as well as safe, was part of the programmes' gender mainstreaming strategy.

efforts,” RMGP II also planned to share information about remediation financing with NI factories and support the development of RCC communication materials.

### Progress against workplan

According to RMGP II analysis, as of January 2020 of SA 1 29 planned tasks, 48 percent were in progress, 24 percent were completed, 17 percent were not started, and another 10 percent had been cancelled. Planned output 1.1 activities were largely in progress except for engaging outside quality control and the model factory design, which had not been started. Output 1.2 implementation was largely completed. At the end of 2019, 52 percent of budget had been spent.

### Main achievements

RMGP II reported it achieved most of its PMP indicator targets at the end of 2019: approval of the escalation protocol, proportion of cases examined by the DIFE task force, frequency of factory visits by RCC engineers, numbers of factories receiving information on remediation funding, and OSS concept developed and accepted by stakeholders. Table 8 shows key achievements under each SA1 output, with more detail on each provided below.

**TABLE 8. RMGP II ACHIEVEMENTS SUPPORTING FACTORY SAFETY THROUGH REMEDIATION**

**BY THE END OF 2020, ALL ACTIVE FACTORIES OF THE TARGET 1,500 NATIONAL INITIATIVE (NI) FACTORIES ARE REMEDIATED**

OUTPUT	ACHIEVEMENTS
A Remediation Coordination Cell (RCC) is established	<ul style="list-style-type: none"> <li>– Binding agreement on Escalation Protocol finalized/approved by MOLE</li> <li>– RCC business processes reviewed/updated</li> <li>– Remediation tracking system established, partially populated</li> <li>– Case Management &amp; Engineering Support provided to RCC Bangladesh</li> </ul>
Employers, workers and buyers are better equipped to support and sustain remediation efforts	<ul style="list-style-type: none"> <li>– 738 NI factories received remediation financing information from ILO</li> <li>– RCC communication materials and website developed</li> </ul>

**Escalation protocol:** The NSC approved the Escalation (Compliance) Protocol for remediation in July 2019 following a RMGP II-facilitated consultation process between the national regulatory agencies and industry. The protocol outlines the roles and responsibilities of relevant regulatory bodies, the review panel as well as teams of engineers, case handlers and data managers who are tasked to follow up on remediation work. Additionally, the protocol details six rounds of escalation process spanning from warning meetings, warning letters, suspension of export

license and the Utilisation Declaration (UD) to the issuance of factory closure orders by the government.<sup>36</sup>

Material and Engineering Support for RCC: Based on document review, the RCC currently includes about 152 full-time staff. In 2017, RMGP II and DIFE signed an agreement that provided DIFE with USD 630,000 over three years to set up RCC offices, recruit temporary personnel, and to establish and run technical task forces and review panels. Another project funded the hiring of 60 Corrective Action Plan (CAP) engineers. Later, in November 2018, RMGP II engaged Bureau Veritas (BV), an international engineering consultancy, to provide engineering support to the RCC through which brought on board about 46 experienced engineers and 9 support staff. DIFE hosts 23 permanent engineers, some of whom also contribute to the RCC.

RMGP II performance data indicated that DIFE engineers visited almost 90 percent of factories at least three times. Based on the NI factory survey<sup>37</sup>, 14 out of 20 factories reported receiving technical advice from DIFE and about half indicated they had received information on government approved firms for remediation design work. Based on document review and stakeholder reports, BV and RCC engineers' collaboration was not initially effective. However, concerned stakeholders reported significant improvements in late 2019 and early 2020, which included joint work planning and BV RCC engineers capacity building. One key informant remarked, *"With the passage of time, knowledge sharing has improved."* However, RCC task force members reported a significant slowdown in activities due to the coronavirus pandemic.

Training: Both RMGP II specialists and BV engineers have trained CAP and DIFE engineers on industrial safety related topics. One DIFE engineer expressed satisfaction with the training, *"We have received various training on structural, electrical, fire issues. The training was useful and relevant. We recently received training from Bureau Veritas on how to conduct and monitor a design. That training was very useful for corrective design."* A few key informants highlighted progress building the capacity of CAP engineers, many of whom were reported by RMGP II personnel to have joined the RCC straight from university and needing extensive capacity building. External stakeholders' perceptions of DIFE remediation competence varied. One NI survey respondent wrote, *"DIFE is not capable for remediation activities."* Two NI factory discussion group participants reported *"DIFE engineers are good and cooperative."*

Remediation tracking module (RTM): RMGP II completed a remediation tracking module, a web and mobile based application to be used by the engineers, case handlers and other RCC staff members for case management. In October 2019, RMGP II reported that over 750 factory profiles and 550 CAP verification reports had been uploaded into the system with work still ongoing.<sup>38</sup> One RMGP II remediation partner indicated that although reliable data had previously been problematic, the RTM was now working well. A CAP engineer affirmed, *"We use the RTM. It is helping to inform the factories. We can also see who has visited. As far as I know, the data is up to date."*

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<sup>36</sup> [https://www.ilo.org/dhaka/Informationresources/Publicinformation/features/WCMS\\_733337/lang--en/index.htm](https://www.ilo.org/dhaka/Informationresources/Publicinformation/features/WCMS_733337/lang--en/index.htm)

<sup>37</sup> The response rate to the NI factories was relatively low. Twenty NI factory management representatives (19 male and 1 female) responded to the survey.

<sup>38</sup> Reported in minutes of October 2019 project steering committee meeting.

**Information on RCC activities and remediation financing:** RMGP II reported that 738 NI factories received remediation financing information during programme-sponsored workshops. In addition, RMGP II developed a remediation tool kit, remediation financing case studies, and supported the RCC to develop a website. The NI factory survey suggests programme information sharing activities were successful: 17 out of 20 survey respondents agreed or strongly agreed that they were aware of programmes to fund remediation. More broadly, survey results suggest that information sharing has been adequate: only 2 out of 20 respondents indicated they had not received information. Most (14 out of 20) reported DIFE engineers provided remediation information while 8 out of 20 reported getting information from the RCC website.

### Progress toward expected outcomes and impact orientation

Outcome 1 under SA1 was, “By the end of 2020, all active factories of the target 1,500 National Initiative (NI) factories are remediated.” Despite RMGP II’s relatively strong performance achieving outputs, progress on actual NI factory remediation has been slower than expected. In December 2019, based on RMGP II reporting, only 17 NI factories had been fully remediated for structural issues. In October 2019, RMGP II reported that of the over 12,500 CAP issues pending remediation, approximately 35 percent were “in progress” and 65 percent had not been started. One donor opined, *“The biggest challenge is pressing the government on remediation. RCC is not proceeding well and no one has a clear roadmap.”*

Approximately 600 NI factories closed between 2015 and mid-2017, before the escalation protocol was in place, reportedly largely because of pressure by the government to remediate safety issues as well as economic factors. In addition, programme personnel reported that since the escalation protocol has been in place, 47 factories had escalated to the factory closure orders stage. Based on DIFE and RMGP II personnel, among the closed factories were factories which had safety issues posing an immediate and serious threat to factory workers. Whether closed or remediated, DIFE and RMGP II personnel reported that no NI factories with very serious safety issues remained open at the time of the evaluation. One DIFE engineer affirmed, *“I think our main achievement was to make some of these factories close. We did not allow them to operate in unsafe conditions.”*

Nearly 645 still active NI factories are in various stages of remediation while RMGP II personnel reported 180 factories had either relocated into export processing zones (12) (not covered by DIFE) or transferred to Accord or Alliance/Nirapon<sup>39</sup> (168) because they satisfied buyer expectations on level of safety. Despite slow progress, one DIFE engineer perceived forward movement, *“They [NI factories] are submitting their design. More than 200 have already been approved...I think given all the challenges, the fact that many factories are working with us and listening to us is a big achievement.”*

### Challenges

As highlighted earlier in section 3.1.2, nearly all evaluation key informants highlighted significant challenges that adversely affected remediation progress by NI factories.

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<sup>39</sup> Nirapon is the national initiative that replaced Alliance when it finished in 2018.

Access to remediation financing: NI factory manager survey results suggested financing issues negatively affected NI factory capacity to remediate the identified safety issues according to the required deadlines in their Corrective Action Plans (CAPs) (reported by seven out of 20 respondents). Even though RMGP II's intervention strategy provided information on sources of financing for remediation interventions<sup>40</sup>, survey respondents suggest providing information alone was not enough to overcome financing issues. Survey respondents noted various factors that limited the usefulness of information. Forty percent and 35 percent of respondents respectively indicated that loan application processes were too complicated, and that terms and conditions were not good. Forty percent of respondents likewise indicated that they were not interested in taking loans. According to RMGP II programme personnel, only five NI factories had succeeded to access remediation financing as of June 2020. A CAP engineer expressed an opinion shared by many evaluation respondents from nearly all stakeholder groups, *"If they [NI factories] had financial support, they would be more interested [in remediation]; I think they would do the work."*

Limited brand leverage: One important external challenge highlighted by many evaluation informants from nearly all stakeholder groups was the lack of brand leverage. One donor described the problem, *"For Accord and Alliance, there was always brand leverage. If they didn't remediate, they would lose business. That has worked. This lacked in the NI factories."* However, based on the NI factory survey, some managers fear negative consequences on their business if they do not remediate safety issues: 8 out of 20 respondents believed they could lose orders.

Commitment of stakeholders to enforce the protocol: RMGP II, MOLE, employers and other stakeholders agreed that the escalation process has not been implemented as efficiently as planned. Several, key informants claimed that BGMEA was not following up on their responsibility to cancel non remediating factory Utilisation Declaration (UD) in a timely manner. According to a DIFE official, BGMEA has acted on its recommendation to withdraw the UD from 135 out of 259 factories. MOLE officials and DIFE engineers also highlighted their reluctance to close factories too quickly. A MOLE official explained, *"The NI are some of the weakest factories. Covid-19 will surely negatively impact them and there is the risk of further closures. If their license is withdrawn, the factories will be even more vulnerable. We have to encourage the factories – we should balance employment and safety concerns."* One CAP engineer opined, *"If we cancel the license, people will lose their jobs. We try to make sure they do the minimum."*

Delays in DIFE approval: Various programme and factory level stakeholders highlighted bureaucratic delays within DIFE as one cause of slow NI remediation progress. One remediation partner remarked, *"Actions from RCC and DIFE are very slow."* Seven out 20 NI factory survey respondents reported delays getting technical approval from DIFE as one of the challenges they faced meeting CAP deadlines.

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<sup>40</sup> ILO and other stakeholders reported that unlike Accord and Alliance, the National Initiative did not fund remediation activities directly. Instead, RMGP II planned to provide information about development partners' financing initiatives. For example, a number of development partners including Japan International Cooperation Agency (JICA), French Development Agency (AFD), German Development Agency (GIZ), International Finance Corporation (IFC), KFW Development Bank and United State Agency for International Development (USAID) established special credit facilities.

DIFE lack of enforcement power: Although the compliance and escalation protocol outlines a process endorsed by the government, as well as workers' and employers' organizations, RMGP II and DIFE reported that the MOLE did not have the authority to close factories for non-remediation. One RMGP II manager explained, *"We want to ensure that RCC has gone through its due process with all of them [NI factories]. The decision to close a factory comes from higher up in the government."*

Factory willingness/ability to make structural improvements in shared or rented buildings: Multiple stakeholders reported that most NI factories operate in rented or shared building, which makes it difficult to address some safety issues. One DIFE engineer explained, *"With fire and electrical, we can manage but structural issues are really challenging to deal with because we need to get the agreement of the building owner."* Results of the NI survey corroborate the latter: 12 out of 20 respondents indicated that structural issues have been the hardest safety issue to address.

### Sustainability

Based on document review and RMGP II programme manager accounts, the RCC, which is almost entirely donor funded, was designed to be a temporary structure. As part of its strategy for promoting a sustainable structure within DIFE to supervise and support industrial safety, the RMGP II project developed a concept for an Industrial Safety Unit (ISU). Based on document review and interviews with MOLE officials, DIFE plans to establish such a unit and is expecting a budget and additional human resource for this purpose in 2021. While affirming the government's strong commitment to establishing the unit, one DIFE official highlighted the need for additional discussion and tripartite dialogue on its design, *"This is a complex issue that needs to be discussed with wider stakeholders."*

One remediation partner highlighted potential human resource issues in the transition from the RCC to the permanent structure, *"The CAP engineers will not be there after 2021. This is a challenge – what will happen after that? There will be 23 inspector engineers, but they have many other responsibilities."* One RMGP II manager, opined about how to operationalize the ISU, *"We think in the future there should more emphasis on the government monitoring remediation while outsourcing more technical aspects to engineering firms. In most countries in the world this is how it is done."* According to one MOLE official, DIFE was already capitalizing on the lessons learned through the RMGP II program and was launching new activities on the remediation of factory electrical systems, covering 1,100 RMG, plastics and chemical factories with its own budget resources.

### 3.3.2 SA 2: Governance of industrial safety and compliance

In the aftermath of Rana Plaza, with the support of ILO and other development partners, the GOB initiated a major reform of the DIFE. The reform roadmap to improve decent working conditions in Bangladesh by strengthening the labour administration and inspection system was first developed in 2014 with RMGP I and later updated in 2017. RMGP II was designed to build on phase one progress with focus on strengthening government industrial safety regulation and continuing to support an effective and equitable labour inspection system.

### Progress against workplan

Under SA2, RMGP II planned two outputs: output 2.1: OSS framework for industrial safety and compliance conceptualized and output 2.2: DIFE labour inspection capacity developed, which is fair, effective and gender sensitive. The main activities planned under the first output included a review of safety agency policies and work on their harmonization (later cancelled); a process to revise and pilot OSS business processes, training of trainers, and activities to promote increased female participation in the safety agencies workforce. Based on RMGP II reporting, as of January 2020, activities under this output were significantly behind schedule. Out of 17 planned tasks, 70 percent were yet not started and only 12.6 percent of the budget had been spent.

The main activities planned under output 3.1 were providing support to develop labour inspector standard operating procedures (SOP), checklists, guidelines and tools, a risk-based annual inspection plan, annual inspection reports, a revised DIFE reform roadmap, a gender roadmap, and a long-term training plan. In addition, RMGP II planned to provide labour inspector training and continue work on labour inspection digitization (LIMA) and related support systems. As of December 2019, out of 76 planned tasks, 57 percent of tasks were not started or behind schedule with 52.1 percent of the planned budget spent.

### Main achievements

Based on RMGP II SA2 reporting, the programme achieved some of its December 2019 benchmarks: implementation of LIMA in all labour offices, the development and validation of an OSS concept, as well as the development of a gender roadmap. The programme reported it was close to achieving publication of annual labour inspection reports but fell short of the objective having a comprehensive DIFE training plan in place and improving inspector awareness on gender issues. Table 9 shows key SA2 achievements by output, with more detail on each provided below.

**TABLE 9. RMGP II ACHIEVEMENTS SUPPORTING IMPROVEMENT IN THE GOVERNANCE OF INDUSTRIAL SAFETY AND COMPLIANCE**

**PROJECT OUTCOME 2: GOVERNMENT EFFECTIVELY REGULATES INDUSTRIAL SAFETY**

OUTPUT	ACHIEVEMENTS
Framework for one-stop-shop for industrial safety and compliance conceptualized	– BIDA/ILO partnership agreed plan to link BIDA OSS with DIFE, RAJUK, BFSCD, CDA

**PROJECT OUTCOME 3: EFFECTIVE AND EQUITABLE LABOUR INSPECTION SYSTEM IN PLACE BASED ON ROBUST PERFORMANCE MANAGEMENT, ACCOUNTABILITY AND A SOUND GENDER EQUALITY CULTURE**

Labour inspection capacity of DIFE is developed, which is fair, effective and gender sensitive	– Support provided for LI SOP, checklists, LI plan, LI reports, checklists
	– Support for LIMA: equipment, system analysis, training for 280 inspectors from 23 labour offices
	– DIFE LI Gender Roadmap approved

One Stop Shop: Among other reforms, DIFE aimed to establish an OSS digital platform and improve related business processes for factory registration, licensing and monitoring which facilitate coordination of relevant government agencies with an industrial safety mandate. One MOLE official explained the intervention's rationale, *"If it [OSS] is accomplished, licensing should be contingent on safety checks being satisfied. That is why if this system can be introduced, it will help with making the factories more compliant."* RMGP II aimed to support the development of a digitalized OSS inter-connecting different licensing/registration systems and accessible by factory managers and other users. According to RMGP II personnel, because of challenges getting the various agencies to work together, OSS progress lagged until the last quarter of 2019. With support from the IFC, RMGP II and BIDA on a partnership to link four safety agencies – the Bangladesh Fire Service and Civil Defence (BFSCD), Chattogram Development Authority (CDA), Rajdhani Unnayan Kartripakkha (RAJUK), and DIFE to the national BIDA-administered OSS.

The national OSS has two objectives: investment simplification and regulatory reform. According to RMGP II and BIDA personnel, from a technological perspective, the national online platform is ready so the main task is linking the agencies' existing licensing systems to the platform, which requires some software development and agency personnel systems administration training. From a regulatory standpoint, integration into the BIDA platform will require the agencies to simplify their business processes and respect service level agreements that specify response times. Although GOB funds for OSS integration are available, BIDA hoped that ILO involvement and funding would make the agency integration and related regulatory reforms go faster. After a series of meetings between RMGP II, concerned industrial safety agencies and BIDA, RMGP II programme managers reported all parties subscribed to the initiative. Several key informants reported however that with Covid-19, progress had stalled.

Support for labour inspector SOP, checklists, labour inspection annual plan and reports: RMGP II progressed on various labour inspection strengthening activities. With RMGP II support, DIFE developed and approved an Inspection SOP as well five sector specific inspection checklists. DIFE also established a workers' complaint hotline and 12 DIFE officers received specialized training at the ILO International Training Centre (ITC) in Turin. To strengthen its reporting and transparency, RMGP II supported the production of two "annual" labour inspection reports, covering 2014-2018 and 2019, both reported to be nearly finished.

Digitization of the labour inspectorate: RMGP II supported DIFE to develop and launch LIMA, which is an integrated platform for information and knowledge management of DIFE activities. The application features four main modules, namely:

**Module 1: Factory/Establishments Database:** allows factories to apply for approval of factory layout plans, licenses, license renewals and modifications.

**Module 2: Labour Inspection System:** features labour inspection scheduling, inspection checklist data collection forms and reporting functions. The module has features enabling case filing and complaint management sub modules.

**Module 3: Occupational Safety and Health:** features occupational accidents, injury and disease reporting functions and includes safety committees and OSH experts databases.

**Module 4. DIFE Management Information System:** which is used for the internal management of information on personnel, revenue collection, and training.

RMGP II personnel reported that as of early 2020, all DIFE field offices (23) and HQ were using LIMA for inspections, license applications, to collect information on factory safety committees, as well as for worker complaints management. According to RMGP II, LIMA users had registered over 10,000 inspections and 1000 license applications. Respondents to the HQ/DIG survey considered LIMA the most useful RMGP II intervention to strengthen the labour inspectorate (selected by six out of eight respondents). The LIMA training participants survey<sup>41</sup> likewise produced findings showing labour inspectors' adoption of the technology:

- Labour inspectors consider LIMA is easy to use (86 percent agree or strongly agree), but still subject to technical problems (76 percent indicated often or very often). However, 79 percent of respondents indicated they can get technical support when needed.
- 70 percent of users feel their suggestions on how to improve LIMA have been considered by ILO and DIFE
- Most inspectors highlighted that inspection visits take longer with LIMA (72 percent) and 49 percent indicated that issuing their report also takes longer (although 40 percent of respondents thought producing the report took less time)<sup>42</sup>
- 89 percent of respondents feel LIMA has made them more effective planning and scheduling inspection visits and 53 percent feel it has helped with managing follow-up visits/tracking remediation.

According to RMGP II personnel, DIFE uptake of various LIMA modules has been unequal to date. In 2020, the programme reported plans to reinforce licensing, complaints management, and accident reporting modules use, which will require greater outreach to prospective factory-level LIMA users outside DIFE as well as efforts to improve DIFE complaints follow-up.

DIFE Gender Roadmap and related BFSCD activities: RMGP II helped DIFE to produce a Gender Roadmap.<sup>43</sup> RMGP II personnel noted the programme was not yet monitoring roadmap implementation and that planned work with BFSCD to strengthen female participation in the agency's workforce also had not yet begun. According to DIFE officials, improving gender equity is a high GOB priority, but roadmap implementation has been limited. One MOLE official highlighted areas of progress: DIFE efforts to recruit female labour inspectors during RMGP I, the recent High Court verdict on sexual harassment, and the creation of factory committees to fight gender-based violence. While noting that Bangladesh supported ILO Convention 190 on

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<sup>41</sup> The LIMA trainee survey reached 88 respondents, 72 males and 16 females.

<sup>42</sup> Some RMGP personnel perceived lengthening inspection time as a sign that inspectors were being more thorough while other ILO officials perceived the checklists were too long and did not prioritize the most important issues. On reported longer inspection reporting times, some inspectors indicated that DIFE was requiring them to submit both manual and digital reports.

<sup>43</sup> The roadmap includes three sections: a situation analysis on gender mainstreaming in DIFE, an overview of existing gender-related projects and programmes, and the roadmap itself with short, medium and long term recommendations.

eliminating violence and harassment in the world of work, the official noted *“a lot of work is needed before ratification.”* One donor expressed dissatisfaction with progress-to-date, *“The Labour Inspectorate has a gender action plan but honestly, we don’t see what has been done.”* The DIFE HQ/DIG survey indicated that labour inspectors need advanced training on gender-based violence and sexual harassment in the workplace.

Comprehensive DIFE training strategy and follow-up: RMGP II planned to support DIFE’s training unit to prepare a long-term training strategy and to support foundational and other labour inspector including specific training on crosscutting issues (information management, LIMA, gender). Except for LIMA training (highlighted above) and ITC training provided for a relatively small number of DIFE officials, RMGP II reported limited progress on planned training, noting lagging progress by DIFE producing the planned training strategy as the main cause. One RMGP II programme manager regretted the limited progress while noting the positive outcomes of phase 1 assistance, *“There is a big difference between labour inspectors that had ILO foundational training and those that did not ...labour inspectors with training are more aligned to transparency and accuracy.”*

#### Progress toward expected outcomes and impact orientation

Many evaluation key informants (programme personnel, donors, GOB partners) perceived significant progress modernizing the labour inspectorate since 2013 with progress continuing, albeit at a slower pace under RMGP II. A MOLE official affirmed, *“There has been a significant breakthrough in labour inspection in Bangladesh...ILO and other partners contributed significantly.”* Based on the LIMA trainee survey, areas where labour inspectors perceive the greatest improvements in recent years are: improved inspection planning (55 percent), improved access to basic inspector training (53 percent) and improved access to specialized training (44 percent).

Outside the MOLE, perceptions were mixed. One donor remarked, *“I think through the programme, there has been a lot changes in labour inspection and safety – not just concepts but also practices.”* Worker and employer perceptions of progress were overall less favourable. While identifying areas for improvement, one workers’ organization representative also saw progress, *“5-7 years back, inspectors were highly corrupted. They used to be very active during the festivals to make extra money from factory owners. It has changed to a big extent these days.”*

Although citing significant progress with digitation, SOP, checklists, and collecting data, ILO personnel highlighted gaps affecting the overall impact of RMGP II contributions on improving the labour inspection effectiveness and transparency:

- Limited use of labour inspection data for setting priorities
- Limited adaption of labour inspection tools to focus on sector specific issues and priorities
- Limited use of awareness raising by DIFE to promote compliance
- Factory- level LIMA users not yet informed/ mobilized (accident reporting, complaints, licensing, safety committees)
- Limited willingness to share data transparently

One RMGP II programme manager opined on the need for setting inspection priorities, *“Up to now, we have just been working with them on check lists. They have done the inspection, but nothing happens. We think to make progress they need to target a few issues.”* Based on MOLE official feedback, Ministry officials perceive the potential of better use of data for decision-making, *“If we can get a data base from LIMA – then we can use the data to develop a plan. They will be able to determine priorities, etc. When we get this detailed data, it will be a great opportunity.”*

Two key positives for expanding the impact of RMGP II interventions cited by stakeholders were GOB resource allocations and DIFE capitalization of RMGP II inputs in other economic sectors. One RMGP programmed manager opined, *“Although the project was developed on RMG, we have expanded our objective to make the labour Inspectorate to be accountable. We have contributed to capacity to inspect all sectors under labour law.”*

### Challenges

RMGP II personnel highlighted several challenges that negatively affected their work under SA2. These included:

- Turn-over within MOLE/DIFE leadership slowed decision-making and approvals
- Although greatly increased from the 2013 baseline, labour inspector hiring has slowed and shortages persist
- Labour inspectors lack enforcement power– fines are low and labour courts are overloaded
- Labour administration processes are still immature

One workers' organization representative highlighted the need to recruit more labour inspectors *“considering the number of factories and importance of follow up inspection.”* One RMGP II manager, while agreeing that more inspectors were needed, also underlined that the inspectorate could use existing resources more efficiently, *“One of the issues is that they have so many check lists. They interpret the law that each inspection has to cover everything while the more strategic way is to take a more targeted approach.”*

RMGP II personnel also cited internal challenges including limited labour inspection expertise within the implementation team and relatively limited budget resources for labour inspector capacity building relative to remediation efforts. On the former issue, RMGP II managers noted that the programme had been designed with a labour inspection specialist on staff but that they had been unable to find an appropriate person to fill the position, which was later eliminated. According to a MOLE official, technical assistance on implementing the labour inspection checklists is critical. While the programme received technical inputs from Geneva-based specialists, one ILO official opined, *“The assistance that may be needed in Bangladesh on labour inspection is more than piecemeal assistance.”*

### Sustainability

The LIMA trainee survey showed stakeholder confidence that the tool would be sustained: 82 percent of respondents think LIMA will continue to be used by DIFE after ILO assistance ends. A positive indicator of sustainability, ILO personnel report that DIFE/MoLE allocated about USD

300,000 in the FY 20-21 national budget to LIMA and the worker complaints hotline. However, RMGP II personnel highlighted that maintenance and support systems need to be institutionalized, noting to date the LIMA support unit remains ad hoc. MOLE officials interviewed by the evaluation team were confident that RMGP II contributions to strengthening DIFE capacity would be sustained, citing significant increased in GOB resource allocations to inspection since 2013. Nevertheless, officials noted that the ILO should intensify technical support on institutionalizing results with focus on building labour inspectors' capacity.

### 3.3.3 SA 3: Occupational Safety and Health (OSH)

RMGP II aimed to contribute to an OSH culture in Bangladesh by supporting the GOB to produce policy documents, conduct awareness raising and, building on phase 1 factory-level achievements, continue to build constituent capacity to create and strengthen factory safety committees.

#### Progress against workplan

RMGP II planned two outputs under SA3: output 4.1: Framework for national OSH programme initiated in line with national OSH policies and output 4.2: Stakeholders' capacity and awareness on OSH built in a gender inclusive manner. The main activities included: OSH profile development, a National OSH Plan of Action (NPA) drafted and validated, other sector safety guidelines developed and diffused; support DIFE safety committee monitoring; OSH day celebrations; various activities with employers and workers' organizations on safety committee capacity building and gender mainstreaming activities. As of January 2020, of 25 planned tasks, 64 percent were behind schedule or not started and 50.6 percent of the budget had been spent.

#### Main achievements

RMGP II reported it achieved December 2019 benchmarks on national OSH profile development, and strengthening DIFE capacity to monitor safety committees. The programme has not progressed against indicator targets on safety committee capacity building. Table 10 shows key SA3 achievements by output, with more detail on each provided below.

**TABLE 10. RMPG II ACHIEVEMENTS SUPPORTING OCCUPATIONAL SAFETY AND HEALTH (OSH)**

**PROJECT OUTCOME 4: OSH IMPROVED IN POLICY AND PRACTICE IN A GENDER INCLUSIVE MANNER**

OUTPUT	ACHIEVEMENTS
Framework for national OSH programme initiated in line with national OSH policies of the government	<ul style="list-style-type: none"> <li>– OSH profile approved, not yet published</li> <li>– NPA drafted, additional stakeholder consultations and approval pending</li> <li>– Safety committee monitoring integrated into DIFE inspection checklists and related training</li> </ul>

Stakeholders' capacity and awareness on OSH built in a gender inclusive manner

- National OSH day activities organized, OSH good practices awards
- Covid-19 guidelines for inspectors produced and diffused

With assistance from RMGP II, MOLE prepared an OSH profile<sup>44</sup> which was approved in September 2019 by the National OSH Council. To reinforce future national OSH reporting efforts, RMGP II SA2 developed a module on accident reporting within LIMA, although planned interventions to promote its use by factory level stakeholders were still pending in early 2020.

Work on the action plan started in late 2019 but workshops to refine the draft early in 2020 were delayed due to the coronavirus pandemic. According to project personnel, after individual consultations with key stakeholder groups, a draft NPA was shared with all members of the National OSH Council in February, 2020. RMGP II intended to finalize the draft with the inputs received from stakeholders by OSH day in April 2020. However, progress was delayed due to the pandemic.

According to RMGP II personnel, the NPA will be a comprehensive, whole-of-government 10-year plan with specific targets and indicators to improve OSH in the country.

Through RMGP II support, MOLE instituted an OSH good practice award for enterprises consistently maintaining high health and safety standards. The 2018 edition focused on the RMG sector and in 2019, the competition was extended to other industrial sectors. In addition, the programme supported annual national OSH day celebrations, a practice started in 2016 under the RMGP's first phase. Based on document review, in 2020, national OSH day celebrations focused on the theme "Stop the pandemic: safety and health at work can save lives." In addition to OSH day activities, RMGP II and Better Work developed other materials providing guidance to inspectors, factory managers and workers on the prevention and mitigation of Covid-19 in the workplace.

RMGP II also provided technical support and training to DIFE to develop a check list to assess compliance with GOB requirements on the creation of factory safety committees. Other planned SA3 interventions to strengthen safety committees, including planned efforts to promote higher levels of female participation, in collaboration with employers' and workers' organizations had not yet started at the time of the evaluation. However, similar activities were implemented by BWB within SA4 and in addition Accord supported safety committees in its factories while it was still operational. A discussion group with BWB safety committee members indicated safety committee engagement on a variety of issues including monitoring fire, electrical and structural safety, proper use of protective equipment and engineering controls, such as needle guards, and in the current pandemic, promoting measures to prevent the virus spread such as wearing face masks, taking worker temperatures and handwashing. One committee member highlighted improvements, *"There has been mentionable improvement in the electrical side. For example,*

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<sup>44</sup> The OSH profile is diagnostic document which summarizes the existing OSH situation, including national data on occupational accidents and diseases, high-risk industries and occupations, and a description of the national OSH system and its current capacity.

*there are no longer loose wire problems and the awareness of workers has also increased.*" One participant said, *"BWB's social dialogue training helped a lot for safety awareness."*

### Progress toward outcomes and impact orientation

Key informants from all evaluation stakeholder groups perceive that Bangladesh has made significant advances in workplace safety since Rana plaza. GOB and donors highlighted important contributions from RMGP I and II, across all intervention areas, while also noting the efforts of other initiatives, notably Accord and Alliance. Among respondents to the BWB brand partner survey, eight of eight respondents perceived increased respect for structural and fire safety norms among their suppliers in Bangladesh.

While expressing satisfaction with RMGP II OSH policy work, programme personnel highlighted that positive outcomes are largely dependent on policy implementation. A MOLE official concurred, *"Regarding the NPA – developing an OSH culture is a must if we want to prevent accidents. The NPA is quite comprehensive. We hope for ILO support to carry out implementation."* Approximately 60 percent of LIMA survey respondents perceived additional training on OSH related issues as an urgent need. Based on RMGP II reporting, progress on safety committee related outcome indicators was minimal. One ILO specialist underlined the importance of strengthening already established workplace safety committees and expanding committee formation into other industries. S/he said, *"A key issue in improving OSH is workers' participation. Workers need to be trained and should be encouraged to report safety issues."*

ILO officials also highlighted other work areas related to OSH that require additional attention. One official opined, *"Workplace social protection systems in the industry haven't been well developed...A person who suffers an accident might get a little bit of money but that's all."* Labour inspector survey comments showed they, like other essential workers in Bangladesh, are concerned about the former issue in the context of Covid-19. According to one ILO official, ILO and GIZ are planning a pilot project with 150 factories to demonstrate that the current social protection scheme can be improved with a modest contribution from employers.

### Challenges

The main challenge reported by RMGP II personnel hindering progress on planned policy work (finalizing and approving documents) was relatively high levels of turnover among MOLE and DIFE decision makers. Programme managers predicted future delays, anticipating that Covid-19 related employment and social protection issues would be competing for policymakers' attention.

### Sustainability

RMGP II and MOLE personnel pointed to several positive factors suggesting RMGP II OSH interventions would be sustained: progress on systemic changes (policies), consistent GOB resource allocations for labour inspection and OSH day activities<sup>45</sup>, and various initiatives to develop OSH expertise among national stakeholders. One RMGP II manager cited a specific

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<sup>45</sup> Programme staff reported that the GOB allocated USD 55,000 for OSH day celebrations and OSH good practice award starting in 2021.

sustainability success story, “the *GOB has invested millions of Taka to start the OSH institute.*” While acknowledging other development partners were supporting the initiative, RMGP personnel noted the decision to create the institution came on the heels of ILO international training during which MOLE personnel visited OSH institutes in other countries.

### 3.3.4 SA 4: Better Work Bangladesh

#### Progress against workplan

Within the RMGP II programme, BWB planned to achieve two outputs: output 4.1: Core service delivery model applied and output 4.2: Engaging stakeholders to contribute to responsible business practices. Based on BWB’s last annual report, the programme met or narrowly missed end of 2019 targets on numbers of compliance assessment reports completed, number of assessment reports accessed by brand partners, number of affiliated brand partners, percentage of cost recovery. BWB narrowly missed its gender mainstreaming targets for percentage of supervisory training participants that are women and the percentage of women on participation committees.

#### Main achievements

BWB annual reports show that it has made progress on most of its 2018-2021 strategic objectives which included increasing factory subscriber numbers, reinforcing activities and services to empower women workers, capacity building for ILO constituents, and strengthening communication activities.

**TABLE 11. BWB ACHIEVEMENTS**

**PROJECT OUTCOME 5: BETTER WORK FACTORIES SERVE AS MODEL FOR COMPLIANCE**

OUTPUT	ACHIEVEMENTS
Core service delivery model applied	<ul style="list-style-type: none"> <li>– 526 compliance assessment reports completed (116% of December 2019 target), 426 accessed by brand subscribers (154% of December 2019 target)</li> <li>– 44% of participation committee members women</li> <li>– 40% of supervisory training programme participants women</li> </ul>
Engaging stakeholders to contribute to responsible business practices	<ul style="list-style-type: none"> <li>– 25 brand partners</li> <li>– 37% cost recovery</li> </ul>

**BWB core service delivery model applied:** As of December 2019, BWB conducted 526 factory assessments of which 426 were accessed by brand subscribers, exceeding targets. In addition to its compliance assessments, the programme supported member factories to conduct guided self-assessments and develop factory improvement plans, provided training on a variety of topics including worker life skills, workplace cooperation, managing people, participation committee roles and responsibilities, sexual harassment and prevention and conducted industrial seminars on topics of common interest from boiler maintenance to the high court

decision on sexual harassment in the workplace. In addition, BWB organized its annual buyers' meeting, a yearly event bringing together buyers and national stakeholders to discuss issues affecting the industry.

BWB and Better Work Global personnel highlighted the important role of enterprise advisors and ongoing efforts to improve their effectiveness and efficiency, noting salaries are Better Work's biggest budget line item. Based on enterprise advisor survey results<sup>46</sup>, the programme has retained relatively experienced individuals: 72 percent of respondents have 10 years or more professional experience and 60 percent have been with the program since before 2017. Based on document review, BWB has adopted good practices from other Better Work programmes such as naming advisors to focal point positions so that they can build more in-depth knowledge on important advisory topics as well as assigning advisors to specific geographic areas to save on transportation costs. Based on the enterprise advisors survey, enterprise advisors perceive their numbers and capacity has kept pace with the programme expansion.

- 100 percent agree or strongly agree that their roles and responsibilities are clear
- 81 percent feel they have received adequate training and preparation to perform their job
- 68 percent agree or strongly agree their workload is manageable while 10 percent disagreed

Factory manager group participants reported they found BWB services useful for improving compliance, with some participants pointing to the business benefits (attracting new buyers). One factory manager discussion group participant affirmed, *"We are fully satisfied. Their [BWB] assessment and audits help us to identify issues. Enterprise advisors help us to understand and solve the issues."* Both factory managers and workers suggested the advisory visits could be more in-depth, indicating this would require advisors to spend more time in the factories. Factory managers appreciated enterprise advisors in their assessor role relatively less. For example, one factory manager said, *"The BWB assessors in some cases highlight minor issues as a big problem which is embarrassing."* For their part, enterprise advisors indicated that advisory services should be more adapted to the specific needs of each factory. One advisor commented, *"BWB should stop providing the same, generic services to all factories...Some industry seminars and advisory services could be mandatory for all factories but [some] advisory and training [services] should be customized."*

Women's representation on participation committees: A key objective of BWB advisory services is to promote improved manager/worker dialogue, mainly by promoting freely elected and active participation committees (PCs) with equitable women's participation. Based on BWB reports, since the programme's inception and until December 2019, BWB facilitated the formation of 171 PCs and 136 Safety Committees (SCs). Of the elected 1863 PC representatives, BWB reported 44 percent were women. In addition to facilitating participation committees, with funding from GAP Inc, BWB collaborated with the ILO Social Dialogue and Industrial Relations (SDIR) programme to implement the Strengthening Social Dialogue in GAP factories in Bangladesh programme. Based on BWB reports, the capacity building programme has involved 44 GAP suppliers and begun training on a variety of planned topics which include freedom of association, collective

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<sup>46</sup> Nineteen respondents (ten male, nine female) participated in the BWB enterprise advisor survey. BWB currently employs approximately 25 enterprise advisors.

bargaining, ILS, human resource management, communications and negotiation techniques, as well as national labour laws.

**Other gender mainstreaming activities:** Based on document review, BWB assesses compliance with national labour laws that affect women (such as laws requiring paid maternity leave and breastfeeding breaks) and includes sexual harassment and prevention training in its core services. In some factories, BWB is also facilitating implementation of a new national regulation requiring the establishment of committees for the prevention of sexual harassment. In addition, BWB runs special women's empowerment activities and programmes in collaboration with the IFC and UNICEF. BWB personnel perceive that these programmes have contributed to a much better understanding of women rights and welfare in participating factories.<sup>47</sup> Several evaluation worker discussion group participants concurred, with one affirming *"BWB works for women's empowerment. We had training on how to cope with stress, how to tackle harassment and raise our voice in the workplace. I applied it later, which was beneficial for me."*

GEAR is one of BWB's women's empowerment programmes. A collaboration with the IFC, GEAR promotes career-advancement opportunities for female sewing operators in RMG factories through soft and technical skills training. The programme also trains factory managers on how to select, promote and support female talent. An evaluation of the intervention's first phased showed that the programme had resulted in an increase in number of women supervisors in GEAR factories (79 participants appointed to supervisory positions). Based on discussion groups with GEAR participants, the training content was useful. One GEAR participant affirmed, *"GEAR training changed me a lot. I have learnt from GEAR how to work as a supervisor...I got technical training about machines. Also, I learnt about anger management, how to deal with workers, how to raise my voice against harassment, and how to understand workers' problems."* A factory manager in a GEAR factory indicated that participation in the programme was beneficial to his factory's bottom line. Better Work research across different countries where it intervenes with similar programmes has shown that supervisor training increases factory efficiency and that increasing the number of female supervisors is an effective strategy to reduce sexual harassment in the workplace, which is often linked to power imbalances between female workers and their male supervisors.<sup>48</sup>

BWB is also partnering with UNICEF to implement the Mothers@Work programme in 80 BWB factories. According to workers and managers involved in the programme, Mothers@Work has contributed to improvements in participating factories' breast-feeding facilities and allowances for working mothers and to increasing participants' awareness of mother/child nutrition good practices. One worker from a Mothers@Work factory reported her factory's good practices, *"We get maternity leave. There is a childcare unit in our factory and mothers with babies under 6 months get breast feeding breaks three times a day."* Factory managers reported that participation in the programme had helped them strengthen their welfare services while a few complained that they expected more financial and logistical support from the programme.

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<sup>47</sup> 89.5 percent of BWB enterprise advisor survey agreed or strongly agreed that BWB gender mainstreaming activities are contributing to empowering female workers.

<sup>48</sup> See <https://betterwork.org/portfolio/discussion-paper-30-an-impact-evaluation-of-better-work-from-a-gender-perspective/>

ILO and UNICEF specialists underlined the relevance of the programme to Bangladesh's RMG sector context where there are many working mothers, many of whom report challenges balancing motherhood with work life and therefore struggle to remain in the workforce. Both specialists suggested that, given relatively low levels of female participation in Bangladesh's workforce, additional efforts are needed to scale the programme, both in the RMG sector and in other sectors. They also highlighted areas where more progress is needed: provision of paid maternity leave, health benefits and child care facilities as well as combatting discriminatory practices that require working mothers to start over in the lowest level factory jobs when they return to work.

### Progress toward outcomes and impact orientation

Programme expansion: Based on RMGP II progress reporting, as of December 2019, 241 factories were enrolled in BWB, employing 560,655 workers, 54% of whom are women, just under the BWB target. BWB personnel reported programme growth accelerated in 2018 and 2019 and included expansion into Chittagong, where the second largest number of RMG factories are situated. One programme manager attributed the acceleration to BWB success leveraging its brand partners and the advocacy efforts of satisfied factory clients. One manager claimed, *"Our long-term clients advocate for us – their buyers are happier, they get more orders, and they are more productive."* One brand partner representative affirmed, *"They are doing an amazing job over the last five years. The first year we started with ten factories. The next year we added ten more. We have about 48 factories in Bangladesh and out of these, 38 subscribe to BWB."* BWB personnel also credited the programme's growth to improved communication with stakeholders. BWB intensified its communication activities in the last three years, including through regular newsletters and discussion papers, increased engagement with national and international media and greater social media use. A few key informants (GOB, employers' donors, and programme personnel) perceived the number of BWB subscribers' low relative to the estimated 4000 RMG factories operating in Bangladesh (see discussion of this issue in section 3.1.1).

Although satisfied with expansion progress-to-date, in April/May 2020, several BWB programme managers indicated they were unsure how the Covid-19 crisis would impact further expansion. Enterprise advisors indicated uncertainty whether the cost of the programme would discourage new factories from joining or result in reduced numbers due to the pandemic's drastic economic effects on the industry. One brand representative suggested the programme consider reducing factory subscription costs. Despite the pandemic, BWB personnel reported that the programme continued to deliver core services including advisory and training using online communication platforms. In May 2020, BWB started delivering some training and counselling for participants in person. Worker and factory manager discussion group participants reported that BWB had adapted advisory content to help factories apply Covid-19 guidelines, with a few participants' noting they missed enterprise advisors' regular visits to their factory.

Compliance with ILS and national laws Among mature factories (longer term BWB factories), BWB impact survey and compliance reports show improvements in some key compliance areas

including wage payments, wage information, welfare facilities and working time.<sup>49</sup> The same reports also record persistent high levels of non-compliance in some areas, among these OSH standards. One BWB programme manager reported his/her experience, *“We know when you work with factories for a long enough time, there is a decrease in noncompliance and an increase in ownership.”* Respondents to the BWB enterprise advisors survey (n=19) believe areas where BWB had made the most improvement were better awareness of national labour laws and ILS, management awareness of importance of compliance, and strengthened presence/capacity of participation committees. BWB factory manager survey respondents (n=154) perceived improvements in many areas, the top three of which were: more engagement of PC and safety committees (88 percent), increased respect for OSH norms (86 percent), and more awareness of national labour laws and ILS (84 percent).

### Gaps and Challenges

BWB personnel, brand partners and donors highlighted various challenges affecting BWB efforts to improve factory compliance, underlining it takes time to change both management practices and worker knowledge and awareness. ILO officials and other key informants also highlighted that compliance was affected by the larger structural industry issues.<sup>50</sup> BWB enterprise advisor survey respondents ranked buyers’ purchasing practices, weak factory management commitment to compliance and the absence or weak capacity of trade unions as the most significant factors affecting compliance.

Progress engaging industry stakeholders: On BWB’s effectiveness promoting dialogue with brands, one donor opined, *“I see the linkages with the buyers might have been better capitalized. There is a need to promote more dialogue between suppliers and buyers. You really see it now with the cancelation of orders during ‘Covid’.”* Several buyer partners highlighted that their participation in Better Work Global programmes, some which addressed industry purchasing practices that affect compliance, had been useful. One Better Work Global training programme participant however noted that compliance-related work and purchasing are handled by different departments and was unable to comment on what, if any changes in practices had occurred on the purchasing side. In discussion groups with factory managers, a few participants highlighted that BWB had facilitated productive dialogue with their buyers on compliance issues. One factory manager said, *“We had a meeting with [name of brand]– we discussed common violations point-by-point...Everyone took it very positively. These kinds of programs should be done more and more.”*

Progress strengthening workplace cooperation/social dialogue BWB, factory managers and workers reported PCs in BWB factories were improving social dialogue, although to varying degrees. One BWB factory manager claimed, *“The PC ensures interaction between workers and owners. In the PC, workers’ grievances are discussed with management.”* Based on worker discussion group data, workers saw the PC as a mechanism through which they could request

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<sup>49</sup> Better Work, An Industry and Compliance Review Bangladesh June 2015- December 2018, [https://betterwork.org/wp-content/uploads/2020/01/Bangladesh-Annual-Report\\_2.pdf](https://betterwork.org/wp-content/uploads/2020/01/Bangladesh-Annual-Report_2.pdf)

<sup>50</sup> These structural issues include high levels of price competition, unbalanced power relations between buyers and suppliers, production pressures associated with “fast” fashion, among others.

benefits and, to a lesser extent, to discuss and find solutions to problems. A small minority openly highlighted committee dysfunctions due to the power imbalance between workers and management.<sup>51</sup> While indicating BWB had improved worker/management dialogue in unionized factories as well, senior BWB acknowledged that barriers to registering trade union in factories were high, and that BWB planned to intensify its engagement with workers' organizations in the future.<sup>52</sup>

## Sustainability

BWB personnel reported that it was too soon for the BWB to develop a comprehensive exit strategy but that its long-term vision was to build the capacity of employers' compliance cells and the Labour Inspectorate. Evaluation document review shows that to date, BWB has organized a few, small-scale capacity building initiatives for ILO constituents (DIFE, BGMEA, BKMEA). For example, in 2018 BWB sent a group of employer representatives to Vietnam to learn about the Better Work Vietnam (BWV) programme experiences, including BWV lessons learned regarding the positive impact of effective social dialogue on business. BWB also provided training to employers and DIFE on its zero-tolerance protocol<sup>53</sup>. While noting RMGP II complementary work with DIFE, senior BWB management recognized the importance of increasing its engagement with national constituent institutions, both employers and the Labour Inspectorate. One manager affirmed, *"We realize that it will not be sustainable if we continue to provide services forever. We also know in Bangladesh the institutional capacity is not yet there."* Some RMGP donors and MOLE officials likewise emphasized the need to strengthen collaboration with national institutions, pointing out that BWB only reaches a small number of relatively larger/well-managed factories. One donor said, *"It is quite important to work with the industrial association which are better able to reach different segments. The need is greater in the smaller factories."*

### 3.4 Resource use efficiency and effectiveness of management arrangements

To evaluate resource-use efficiency and management effectiveness, the evaluation team analysed the extent to which the RMGP II and BWB achieved planned activities and outputs according to workplan timelines. The team also examined various evaluation key informants' perceptions of intervention cost-effectiveness and management effectiveness.

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<sup>51</sup> Although worker interviews were conducted by phone during non-working hours, it is possible that some workers may have been reluctant to criticize factory management strongly on the phone to strangers.

<sup>52</sup> A United States Senate mission to Bangladesh to investigate progress on promoting workers' rights in Bangladesh post Rana Plaza reported in March 2020 reported serious freedom of association violations in the RMG sector: "Today, many of Bangladesh's RMG factory buildings are structurally safer, but the workers inside are not. Labor rights have declined precipitously." During the evaluation workshop with ILO constituents, a senior industry association leader underlined that it had not been consulted by the mission and found its report to be biased. One ILO official consulted during the evaluation opined, "There is still heavy resistance to labour rights and trade unionism. The tide has not turned so that people think it is normal for workers to have a voice. The foundations are there but change is slow – that journey has many miles left."

<sup>53</sup> Better Work considers human rights violations, including child labour, forced labour, corporal punishment, physical abuse, violence, and issues that pose an imminent threat to worker health and safety to be zero tolerance issues. The zero tolerance protocol describes how Better Work handles these issues when they are uncovered in enrolled factories.

### **3.4.1 Extent RMGP II is achieving workplan objectives on time**

RMGP II management reported that remediation, governance and OSH interventions were behind schedule, with delays more significant in some areas than others. Based on RMGP II reporting, at the end of 2019, halfway through its implementation period, the programme had completed about one third<sup>54</sup> of planned activities (see detailed breakdown by SA in section 3.3 under “progress against workplan”). In the original six-year workplan, RMGP II planned that most activities would be completed by 2020 (analysis excludes BWB, which is operating under a longer timeframe). In the original plan, RMGP II’s 20 programme staff were to be reduced to seven, with their responsibilities mainly focused on finalizing and monitoring remediation and governance interventions.

RMGP II personnel reported that based on RMGP II’s January 2020 stocktaking exercise, many planned activities would need at least an additional year to complete. In early 2020, the team began planning how to realign budget and human resources accordingly. With the advent of the coronavirus pandemic, additional workplan revisions were in process during the evaluation period (April-September 2020) taking into consideration previous delays as well as the effects of the crisis on implementation and constituent and donor priorities. RMGP II reported that earlier implementation delays, for example the relatively long period the programme operated without a Chief Technical Advisor, had slowed the programmes’ burn rate so that there was scope to reappportion the budget to allow a greater-than-planned number of key personnel to stay on the job beyond the end of 2020.

### **3.4.2 Programme stakeholders’ perceptions of resource efficiency and management effectiveness**

Various stakeholder feedback highlighted examples of both effective and ineffective resource use and management by RMGP II and BWB. The following are some positives examples cited by evaluation key informants:

- Retaining many experienced personnel from the first phase and reinforcing gender, monitoring and evaluation and communication staff capabilities per phase one evaluation recommendations
- Leveraging regional specialists’ inputs including regional and headquarters-based gender, OSH and labour inspection specialists, who provided technical support and oversight in various activities
- Coordination with development partner sector initiatives and in some cases, such as BWB partnerships with IFC on GEAR and UNICEF on Mothers@Work, mobilizing additional resources to scale successful initiatives
- Tightening procurement controls and closely monitoring contract deliverables, withholding payment for goods and services not meeting contractual requirements
- Improving BWB enterprise advisor deployment efficiency including its recent use of online advisory services
- Increasing BWB cost recovery through service charges every year since the programme was launched

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<sup>54</sup> Figure reported to the program steering committee in February 2020.

- Contributing to testing intervention models and building constituent capacity, for example within the RCC/ISU, that DIFE plans to capitalize on and, in some form, sustain with its own resources.

Examples of less than effective resource efficiency and management effectiveness perceived by evaluation stakeholders included:

- Inadequately capitalizing on potential synergies between BWB and the rest of RMGP II
- Slow hiring of a new Chief Technical Advisor (CTA) after the original left the programme and the perceived long gap before the new CTA completed a programme wide stock-taking exercise
- Insufficiently capitalizing on programme monitoring activities for decision-making, including by discontinuing regular staff meetings to review progress and solve problems
- Sometimes inadequately coordinating communication and procurement activities, requiring last-minute actions
- Inadequately capitalizing on phase one constituent organization master trainers on factory safety committees

Donors generally perceived high value-added working with the ILO because of the Organization's good reputation in the country, its expertise on labour matters, and ability to engage tripartite stakeholders in Bangladesh and globally. Some donors expressed disappointment with RMGP II and BWB progress to date, indicating they perceived RMGP phase one results to have been more substantial and more effective engaging constituents. Donors generally expressed satisfaction with the extent their own institutions had been engaged and informed (with some previously noted concerns with the usefulness of programme indicators for measuring progress) and highlighted examples showing their contributions had been capitalized by the programmes.

Overall, the MOLE officials interviewed by the evaluation team perceived ILO management costs to be high, with too great a percentage of budget costs going to administration and salary. Officials suggested that one way for ILO programmes like RMGP II and BWB to be more cost efficient was to make better use of national expertise. Based on evaluation team document review, 17 of 21 RMGP II and 38 out of 40 BWB personnel are national personnel. The proportion of administrative versus programme personnel, which depends on how some positions such as monitoring and evaluation and communications are classified, is roughly 40 to 60 percent for RMGP II and 15 to 20 percent for BWB. These figures do not reflect how budget resources are allocated in absolute terms and do not consider budget resources that are allocated to ILO indirect costs, some of which are administrative.

## 4. Conclusions

### Conclusions on Relevance and Design Validity

**RMGP II objectives and strategies largely aligned with MOLE needs and priorities but to a lesser extent with those of other ILO constituents.** The programme's efforts to address industrial safety concerns, OSH policy and practice as well as its Labour Inspectorate capacity building efforts are highly relevant given the RMG sector's importance in Bangladesh's economy and the GOB's

future ambitions to become a major global manufacturing hub. RMGP II activities were relevant to all ILO constituents to the extent that government, workers and employers were all concerned with preventing future industrial accidents and assuring international brands and buyers that goods sourced from Bangladesh respect ILS and national labour laws. However, RMGP II's large focus on government capacity building did not satisfy workers' and employers' organizations expectations and perceived capacity building needs. For its part, BWB, both a component of RMGP II and its own stand-alone programme, was largely unfavourably perceived by national level ILO constituents, which still have limited direct collaboration with the programme. However, evaluation findings show its relevance to factory-level stakeholders' and their brand partners' needs was overall high for a variety of reasons BWB factories managers perceived the programme to have been good for business while workers cited improvements in their welfare and working conditions.

**RMGP II and BWB planned interventions aligned with ILO priorities and strategic plans and with national, regional and international development frameworks.** The programmes' planned intervention strategies aimed to help national counterparts uphold International Labour Standards (ILS) and national labour laws, engaged tripartite bodies, and integrated gender equity concerns effectively. RMGP II and BWB strategies also aligned with and contributed to key national, regional and international economic development and decent work agendas such as the GOB's Vision 2021 and the Seventh Five Year Plan (2016-2020), Bangladesh's Decent Work Country programme (2017-2020), multinational frameworks on sustainable supply chains and the Sustainable Development Goals (Agenda 2030).

**RMGP II and BWB interventions strategies generally drew on ILO strengths and adequately considered country level challenges and opportunities, but some strategies could be improved.** NI remediation strategies followed through on phase one audits and appeared relatively well designed to strengthen enforcement. However, they do not address many of the root causes of NI factory safety problems, such as the factories' financial and management challenges. Additional interventions appear needed to upgrade NI factories and preserve employment, more so now given new Covid-19 related challenges. RMGP II strategies to improve factory licensing processes and strengthen coordination among GOB agencies were likewise valid but their focus on building online systems risk being overly technology-centred while most challenges are enforcement capacity related. Overall, the ILO RMG portfolio showed strong thematic synergies, even though funding was unevenly distributed and some areas such as minimum wage-setting mechanisms and labour court reform are not currently addressed by current projects. To date, RMGP II and BWB have not adequately capitalized potential implementation synergies although CO reflections on a "cluster approach," explicitly aimed at improving both thematic and operational synergies in the CO RMG portfolio, may bring improvements.

**Among new emerging risks affecting programme interventions' efficacy, the coronavirus pandemic is clearly at the top of the list.** Evaluation findings show important new challenges with large potential negative consequences on workers' health and well-being as well as on Bangladesh's RMG industry and national economy, with shrinking orders, loss of employment and limited social protection being major constituent concerns. At the time evaluation data collection with national stakeholders (April-May 2020), RMGP II and BWB efforts to readjust to the post-pandemic reality were in their early stages. Early ILO guidance and awareness-raising efforts on how to prevent virus spread in the workplace and efforts to facilitate dialogue within

the industry were well-appreciated by national stakeholders, who nevertheless held high expectations for more comprehensive future support. For its part, the CO, RMGP II and BWB leaders appeared cognizant that national priorities and needs were shifting and would require a revision of existing RMGP II and BWB intervention strategies as well as related output and outcome indicators.

### Implementation progress and effectiveness

**Strategic Area (SA) 1 Remediation:** Despite RMGP II's relatively strong performance achieving output targets, progress on actual NI factory remediation has been slow and is unlikely to accelerate in the near term. Several hundred unsafe NI factories have been shut down thanks to RMGP I and II remediation efforts as well as economic factors. Nevertheless, slow follow-up and reported partial implementation of the remediation escalation protocol (officially endorsed in July 2019) by DIFE and by BGMEA suggests limited political will to strictly enforce deadlines, a challenge likely to be exacerbated given current national concerns to preserve employment during and after the Covid-19 pandemic. Among the 645 factories with outstanding corrective action plans, the limited number of NI factories that have started remediation or accessed remediation funding suggests that upscaling DIFE technical capacity and informing NI factories about funding opportunities are unlikely to be effective achieving 100 percent remediation by the end of 2020. However, progress appears to have been made improving cooperation and knowledge-sharing between DIFE and private sector engineering teams hired by RMGP II. These capacity building efforts should benefit DIFE's planned Industrial Safety Unit (ISU), although the ISU strategy still needs to be more fully fleshed out and discussed among tripartite constituents. Although building the future units' capacity will likely take time, ISU creation holds promise for sustaining remediation work and for facilitating the extension of DIFE industrial safety monitoring to other sectors needing oversight.

**SA 2 Governance:** With delayed OSS and gender roadmap implementation, RMGP II contributions to improving labour governance have been mostly DIFE focused, and mainly on improving inspection tools and procedures. While the former made good progress and, especially in the case of the LIMA inspection module and inspection check lists, have been largely institutionalized, efforts to build DIFE capacity to determine priorities, including how to cooperate with new industry initiatives such as the RMG Sustainability Council (RSC), have been limited to date. In the absence of stronger DIFE capacity to use and follow-up on inspection and other data, such as worker complaints, RMGP II interventions' impact on compliance will likely be limited. In this respect, delayed progress developing a comprehensive DIFE training strategy, while a gap, is also an opportunity to ensure the plan includes interventions to build DIFE's analytical competencies. Moreover, given the scope of labour inspector responsibilities, their still limited numbers and enforcement capacity, scope exists within SA2 to strengthen DIFE's awareness raising strategies, building on successful OSH awareness raising (national day celebrations, Annual OSH Awards) and factory-level stakeholder empowerment intervention strategies using, among others, BWB factory-level stakeholder empowerment interventions (participation committee facilitation, sexual harassment prevention training).

**SA 3 OSH:** RMGP II OSH policy work advanced well, and if validated, should lay a foundation for a comprehensive national OSH strategy. However, planned efforts to capitalize past successes around factory safety committees largely lagged, except in BWB factories. The planned NPA

holds promise to provide a framework for future OSH interventions but its impact on worker safety and health is largely dependent on implementation, including institutionalizing RMG remediation and labour governance interventions and continued factory level stakeholder capacity building.

**SA 4 BWB: BWB programme expansion accelerated modestly, producing positive BWB factory level results related to compliance, women worker empowerment and worker/employer dialogue, especially among factories in the programme for longer.** Evaluation findings also suggest BWB has contributed to reducing compliance audit duplication in some subscriber factories, as more brand partners agreed to forego their own audit process and accept BWB reports. Communication activities also intensified, with greater efforts being made to share BWB success stories with industry stakeholders. The Covid-19 crisis appears to have accelerated Better Work supplier/brand facilitation activities at the factory, national as well as at the global levels, offering the programme the opportunity to capitalize on its strong brand relationships to help overcome the current crisis and rebuild trust. Relatively less progress was made strengthening BWB engagement with DIFE, industry associations and workers organizations, although Better Work Global and BWB personnel indicated plans for broader national level stakeholder engagement in the future to build programme sustainability and share its good practices and lessons learned to reach a broader segment of the industry.

#### Resource use efficiency and management effectiveness

**RMGP II implementation delays suggest less-than-optimal resource use, which were mitigated by the programmes' largely effective leveraging of ILO's global, regional and national expertise, knowledge base, as well as the CO's strong tripartite constituent relationships.** The programme faced many external challenges that negatively affected progress and was to varying degrees proactive and effective analysing the causes and finding solutions. Planned budgetary revisions provide programme managers the opportunity to review planned interventions and expenditures in light current priorities, and potentially to increase operational synergies within the CO's RMG project portfolio.

#### Sustainability and impact orientation

**RMGP II work strengthening governance structures and facilitating systemic approaches to promoting safe and decent work, while relatively slow producing some planned results, is compensated by its relatively high impact and sustainability potential.** For example, the programmes DIFE institutional capacity building efforts offer opportunities to replicate good practices in sectors outside RMG and leverage national expertise and budgetary resources to sustain interventions beyond the programme intervention period. There is already evidence of the latter, based on DIFE's reported plans to extend electrical and fire safety activities to other sectors using their own resources. RMGP II remediation and BWB factory level interventions have already successfully addressed issues affecting workers' lives and safety. In the case of BWB, by building stronger synergies with national level work, the programme also has the potential to contribute to improving the broader enabling environment by demonstrating, among other approaches, how improved worker/employer dialogue and women worker empowerment contributes to industry bottom lines.

## 5. Recommendations

The following six recommendations of the evaluation are addressed to the ILO:

### 1. The ILO should focus remediation interventions on longer term DIFE capacity building related to the ISU and strengthen NI factories access to remediation financing

- Intensify capacity building for DIFE related to ISU, focus on core group of DIFE engineers
- Facilitate tripartite consultations and discussion on ISU as well as how ISU and RSC will interact
- In ILO's post Covid-19 RMG strategy, explore feasibility of program for small and medium factories that provide holistic assistance to improve safety, compliance with ILS and productivity, for example SCORE, WISE
- Advocate for factory upgrade financing facilities appropriate for small & medium factories
- If funding is available, consider partial remediation grants to NI enterprises for safety upgrades for enterprises willing to invest own resources, since lack of funding appears to be a significant constraint for some enterprises

Responsible unit(s)	Priority	Time implication	Resource implication
ILO RMGP II and CO Dhaka	High	Short to médium term	Low to Medium

### 2. Ensure OSS is a balanced intervention – people, process, policy, and technology

- Plan interventions to engage business associations on need to reinforce safety checks within licensing process – drawing on lessons learned within RCC
- Beware of differences in the objectives of BIDA and ILO – the former to make licensing simpler, faster and the other to ensure safety issues are addressed prior to licensing and ensure that there are safeguards in the “simplified” licensing processes to prevent factories with serious safety concerns from receiving/renewing their license.
- Limit programme investments in equipment and software -use available government money for technical aspects and focus on people and process dimensions which align with ILO strengthens and value added.

Responsible unit(s)	Priority	Time implication	Resource implication
ILO RMGP II	High	Short to médium term	Medium to high

### 3. Strengthen RMGP II interventions to build labour administration capacity to set inspection priorities and implement holistic strategies to improve compliance

- Build on the success of and continue to refine LIMA with emphasis on advanced reporting to support decision-making
- Build DIFE capacity to analyse and use LIMA data to set inspection priorities
- Identify high priority post-Covid-19 compliance issues and build DIFE capacity to monitor and follow-up on these issues with multi-pronged strategy – education, communication, enforcement

- Support implementation of priority Gender Road Map activities
- Reinforce labour inspection expertise on RMGP II team
- Strengthen synergies with BWB on labour inspector capacity-building
- Integrate constituents in action programs to address post-Covid-19 compliance/safety issues

Responsible unit(s)	Priority	Time implication	Resource implication
ILO RMGP II	High	Short to médium term	Medium to high

#### 4. Make BWB more visible and relevant to national level RMG stakeholders

- Continue and reinforce interventions addressing Covid-19 related challenges facing industry: continue tailoring factory level advisory services to Covid-related issues
- Consider taking a stronger, more public position responsible business practices (brands purchasing practices) and continue contributing to effective brand/supplier dialogue
- Reinforce capacity building interventions involving ILO constituents – DIFE, Employers' Associations, Trade Unions
- Develop strategy to scale/sustain successful gender intervention strategies: GEAR, Mothers-at-Work, Sexual Harassment Prevention
- Contribute to national debate on RMG sustainability using BWB experiences and data showing linkages between social compliance and productivity
- Develop PMP indicators that measure progress on influencing agenda and on exit strategy

Responsible unit(s)	Priority	Time implication	Resource implication
ILO/BWB	High	Short to médium term	Medium

#### 5. Build ILO post Covid-19 strategy to support RMG sector recovery using “cluster approach”

- Revise current programme workplans based on sector wide theory-of-change
- Develop new programmes based on sector wide theory-of-change
- Strengthen linkages between factory-level experiences, data and policy advocacy

Responsible unit(s)	Priority	Time implication	Resource implication
ILO RMGP II/BWB and CO Dhaka	High	Short to médium term	Medium

#### 6. Capitalize 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

- Areas that would benefit from greater involvement of constituents in consultation and validation include the OSH NPA, the ISU concept and implementation strategy, and the ILO RMG cluster ToC
- Strengthen cooperation between RMGP II and BWB management teams by building in more synergies in intervention areas of shared interest – LI capacity building, OSH management

The above has low resource requirements.

Responsible unit(s)	Priority	Time implication	Resource implication
ILO RMGP/II/BWB and CO Dhaka	Medium to High	Short term	Low

## 7. Strengthen overall project management

- Review planned down-scaling of project personnel to keep key personnel on longer
- Conduct more regular stock-taking exercises (example January 2020 analysis), especially to adapt existing strategies to Coronavirus-induced industry challenges
- 

Responsible unit(s)	Priority	Time implication	Resource implication
ILO RMGP/II/BWB and CO Dhaka	High	Short to medium term	Low

## 6. Good practices and lessons learned

### Good Practices

RMGP II AND BWB featured a variety of good practices that may be useful if replicated in other projects with similar conditions and objectives. Some examples are listed below.

**1. RMGP II strong engagement with donor country embassy officials:** RMGP II donors' oversight is conducted by embassy officials who showed high levels of interest and in a few cases, provided guidance for programme implementation. Donors officials cited examples when they facilitated connections between RMGP and other national or RMG sector programmes they supported. For example, it was one of the donors that suggested that the RMGP II OSS activity consider associating with BIDA. Through their country's membership in the Sustainability Compact, the donor countries not only offered financial resources for programme implementation but contributed to high level, multilateral dialogue on needed reforms, drawing attention to and encouraging the GOB to maintain its efforts to improve worker safety and uphold international labour standards.

**2. Linking labour administration reforms with national digitization and good governance strategies:** RMGP II investments in LIMA and planned investments in OSS appear to have benefited from its association with the national E-government strategy, currently a government

priority for which there is funding and high level visibility. The adoption of LIMA by the World Bank as a good governance indicator likewise raised the profile of the initiative and labour inspection report more broadly. Because effective adoption of new technologies often requires buy-in from institutional decision-makers, associating LIMA and OSS was useful to spur progress and facilitate resource mobilization.

## Lessons learned

The evaluation suggests some lessons learned that may be used to inform the design and implementation of future ILO programmes. In particular:

**1. Importance of creating synergies between national and factory level intervention strategies:** Evaluation findings suggesting missed opportunities stemming from the relatively strong disconnection between RMGP II remediation, governance, and OSH interventions and BWB factory level interventions suggest the above lesson learned. Evaluation participants highlighted the potential for factory level interventions to inform policy work and institutional capacity building strategies. Some examples offered included opportunities to use BWB data on non-compliance and related research to inform national decision making and policies as well as opportunities for national institutions promoting compliance to benefit from Better Work's national and international good practices and lessons learned and vice versa.

**2. Need to develop management systems that allow monitoring data to inform intervention priorities and decisions:** Evaluation findings identifying needs to strengthen DIFE use of LIMA inspection data to set inspection priorities (as well as the need to focus data collection more narrowly on high priority issues) and RMGP II personnel feedback that programme monitoring could be better capitalized for decision making suggest the above lesson learned. In both cases, findings suggest balancing interventions to build and collect data with interventions that enable people to analyse and use the information.

## Annexes

### Annex A. Evaluation terms of reference

#### 1. Introduction and rationale for evaluation

These Terms of Reference encompasses the mid-term evaluation of the two main complimentary 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);
- 2) Better Work Bangladesh–BWB (funded through the RMGP-II and additional funding sources).

This mid-term evaluation (MTE) takes on a “clustered approach” and complies with the ILO Policy Guidelines for Evaluation published in 2017, which requires all 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 MTE will be managed by the Regional Evaluation Officer based in the ILO Regional Office-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 and the ILO Country Office in Dhaka 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 National Evaluation Group (UNEG)'s Evaluation Norms and Standards<sup>3</sup>.

The programmes to be evaluated share the common objective of improving working conditions in the ready-made garment sector in Bangladesh. The RMGP II and the BWB programme teams work closely together, share and leverage information and resources. This cluster MTE will allow for a holistic and integrated approach in assessing the coherence of the design of programmes/projects, efficiency and effectiveness of progress being made in terms of the overall objective of improving working conditions of the RMG sector, and in assessing impact and sustainability of the work being pursued by constituents and ILO in the sector. The evaluation will assess implementation performance and enhance learning within the ILO and among key stakeholders. The evaluation will apply mixed methods – both qualitative and quantitative. The evaluation team will conduct a thorough review of relevant documents and propose possible methods to gather evidence of implementation, progress, and challenges during the site visits. The evaluation will thus address OECD/DAC evaluation criteria and other relevant cross-cutting issues. Gender equality and non-discrimination, promotion of international labour standards, tripartite processes and constituent capacity development and environmental issues will also be considered throughout this evaluation.

This evaluation is planned for February-May 2020, with the final report expected to be completed by mid-May 2020. The evaluation findings and recommendations will help guide the programme team in the planning and implementation of the remaining duration of the programme, and will provide valuable inputs to guide the future direction of ILO's interventions in Bangladesh's RMG sector. 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.

#### 2. Background and description of programmes to be evaluated RMGP-II (2017-2023) and BWB II (2017-2022)

The RMGP-II (2017-2023) is a USD 24.5 million six and a half year programme designed/intended to improve the working conditions and safety standards in the RMG sector of Bangladesh. The first phase of the programme, which ran from October 2013 until June 2017, focused on building and fire safety assessments; labour inspection reforms; awareness on occupational safety and health (OSH); rehabilitation and skills training for Rana Plaza survivors post Rana Plaza collapse in 2013. Phase 1 of RMGP also saw the launch of the Better Work Bangladesh programme, a partnership between the ILO and the International Finance Corporation (IFC).

To build on the achievements of the first phase, the programme entered into its second phase in July

2017, which covers four strategic areas including:

- (1) Strategic Area (SA) 1: Ensuring factory safety through remediation;
- (2) Strategic Area (SA) 2: Governance building to effectively regulate industrial safety and support labour inspection reform;
- (3) Strategic Area (SA) 3: Improving OSH in both policy and practice, including in the support of the empowerment of women workers; and
- (4) Strategic Area (SA) 4: Expansion of Better Work Bangladesh programme to ensure compliance in at least 400 RMG factories.

Better Work brings diverse groups together – governments, global brands, factory owners, and unions and workers – to improve working conditions in the garment industry and make the sector more competitive. BWB II expects to meet the following objectives:

- (1) Roll out of BW's newly revised factory services to target factories. The focus will be on ensuring high level of factory participation and strong quality of management of services.
- (2) In collaboration with ILO's wider RMG sector programme, maximise BWB's long-term impact on the effectiveness of national institutions to promote compliance in factories where the programme does not operate, for example, supporting the training of labour inspectors and ensuring synergies in implementation.
- (3) Develop a strategy to increase the long-term viability of the programme with a focus on building capacity and leadership of national staff and improving the cost recovery from the programme through private sector revenues.

## **2.1. Donors**

All of the donors have approved the cluster approach and agreed to make financial contributions, proportionally (with the exception of USDOL because they will be conducting their own evaluation of the BW component at the end of this year.) All donors have provided inputs to the TOR and will be consulted throughout the evaluation process.

## **2.2. Stakeholders and Partners**

RMGP II and BWB initiatives are implemented in collaboration with the tripartite constituents and key stakeholders while target groups remain unchanged from the first phase. More specifically, Government institutions, Employers' and Workers' organizations have key execution responsibilities as primary partners, under the National Tripartite Committee on Fire and Building Safety.

### **2.2.1. 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).
- b) The Ministry of Home Affairs 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, 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: RAJUK, the Chattogram Development Authority, and other local development authorities.

(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.

(iii) Workers' organizations

- a) IndustriALL Bangladesh Council (IBC) is an affiliate of IndustriALL and an alliance of sectoral unions of which a majority are in the garment sector
- b) National Coordination Committee for Worker's Education (NCCWE) is an alliance of national union federations, representing workers in different sectors including garments

(iv) Under BWB, factories, their management and workers are also direct programme recipients because the programme provides direct services at enterprise level.

(v) Garment and retail brands sourcing from Bangladesh

### 2.2.2. Other collaborating agencies and organizations

- (i) Bangladesh Bank and private financing institutes (PFIs)
- (ii) Bangladesh Investment Development Authority (BIDA) and Bangladesh Economic Zone Authority (BEZA) – both involved in establishing one-stop-shop for streamlining licensing services in the country
- (iii) Bangladesh University of Engineering and Technology (BUET), a leading academic institution for undergraduate and postgraduate studies in engineering, architecture, planning and science.
- (iv) Private sector: brands and buyers sourcing from Bangladesh, in particular the Accord and Alliance until they exit the country and which are working closely with the ILO on issues related to remediation and OSH.
- (v) The Buyers Forum-A consortium of Buyers and Brands sourcing from Bangladesh (led by H&M)
- (vi) The IFC, co-implementing GEAR

### 2.2.3. Ultimate beneficiaries

- (i) The ultimate beneficiaries are, initially workers in the RMG industry, which directly employs some 4.2 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.

## 2.3. Programme objectives

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

The theory of change (ToC) of the programme lays out the pathway between outputs and impacts and identifies major assumptions along the way. The TOC is based on the fundamental logic that when labour inspection reform takes place, all RMG factories are remediated, OSH is improved in policy and practice, all of these will lead to safe and decent working conditions in Bangladesh, which in turn will contribute to safeguarding competitiveness and poverty reduction through improvements in the quality of jobs.

The programme is designed to intervene along four strategic areas (corresponding to five outcome results) which are mutually supportive and re-enforcing:

The interlinked and mutually supportive nature of the strategic areas (SA) i.e. Remediation, Governance (Labour Inspection), Occupational Safety and Health (OSH) and Better Work Bangladesh provide entry points that:

(a) **Influence** the implementation of national laws and policies as well as the application of International Labour Standards (i.e. C.081 concerning Labour Inspection and C.155 concerning OSH). Examples in this regard include the RMGP-II's technical support to the Government of Bangladesh (GOB) in developing key policy documents such as the National OSH Profile and the National Action Plan on OSH to facilitate the strategic implementation of the National OSH Policy of 2013. This **macro level** area of intervention, which primarily focuses on improving the governance of labour administration, is an inevitable course of action if long-term changes are to be effected.

(b) **Facilitate** the improvement/enhancement of capacities of the direct beneficiaries of the RMGP-II which include, but are not limited to the Labour inspectorate, RCC Engineers and Government Officials, academia i.e. BUET, etc. The RMGP-II facilitates these **meso level** actions through continuous trainings and the development of institutional mechanisms such as the Labour Inspection Management Application (LIMA), one-stop shop (OSS) for licensing services, model factory design guidelines etc. The technical work under the RMGP-II also seeks to effectively mainstream gender across the four strategic areas to ensure equitable outcomes as outlined in the Programme's Gender Strategy and Action Plan as well as the development of Gender Road Maps for selected institutional partners.

(c) **Influence** changes in norms, attitudes and perceptions related to safety standards in Bangladesh's RMG sector from a policy, law and regulatory point of view by bringing awareness (and advocacy) on the potentially negative effects of poor structural, electrical and fire safety.

This **meta level** area of work is being advanced through the design of various campaigns ranging from the Complaints System Mechanism under LIMA, Help Line Service, Accident Reporting as well as increasing the awareness among implementing partners on gender equality and equity issues.

(d) **Facilitate** actions at Factory level under strategic area 4 which is essentially the factory-facing component of the program which applies the core service structure of Better Work i.e. assessment, advisory and training from which industry practice intel is obtained in order to advocate for better business conduct by factory owners, brands and buyers. While termed as **micro level** work (i.e. direct market interaction), the scope of work under this strategic area (SA) is focused on improving social compliance in export-oriented factories to ensure the sustainable growth of the RMG sector. Some of the work carried out by Better Work focuses specifically on women workers' wellbeing and empowerment, such as the Mothers@Work initiative implemented jointly with UNICEF that addresses maternity protection, respectful breastfeeding and childcare in garment factories.

Overall, the RMGP-II's systemic approach as described above is driving momentum towards an industrial safety presence Bangladesh that has a strong governance structure that ensures the enforcement of national safety, labour inspection and social compliance standards as well as equitable gender outcomes, matched with the right competencies and capacities of the Government and industry stakeholders.

#### **2.4. Management arrangements and ILO technical backstopping**

The programme is managed by the ILO Country Office for Bangladesh. The ILO Country Office:

- (a) has overall responsibility for programme implementation and the effective delivery of planned activities, outputs and objectives
- (b) provides the necessary administrative and logistical support
- (c) ensures the coordination and synergies with related ILO initiatives in Bangladesh, either ongoing or foreseen in parallel to the programme
- (d) coordinates and seeks necessary technical backstopping support from relevant specialists from the ILO's GOVERNANCE Department, Decent Work Team in New Delhi, Regional Office in Bangkok and other relevant technical units at ILO headquarters including LAB/ADMIN OSH.

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

Main programme staffing under the RMGP-II (excluding BWB) consists of a total of 21 positions, of whom four are international and ten national professional officers, two programme and one admin assistant, two secretaries and two drivers. The majority of positions are time-limited, with only seven positions (two international, two national professional and four support) continuing after 2020 till 2023. A further two positions (one international and one national professional) exist only from 2020 to 2023. The two communications positions (one continuing to 2023) are cost-shared with other programmes, ensuring coordination with overall office operations.

The BWB programme is forecasted to include up to 51 staff in total by the end of the second phase (depending on progress of factory and brand recruitment), of whom two are international professionals.<sup>4</sup>

#### **2.5. Strategic Fit**

##### **2.5.1. Link to Programmes and Budget, Decent Work Country Programme Outcomes**

When RMGP II was initially designed, it was aligned to support the realization of ILO Programmes and Budget (P&B), 2016-17 Outcome 7: *Promoting workplace compliance through labour inspection*, in terms of:

**Indicator 7.1:** Member States that have improved legal frameworks, policies, plans or strategies to strengthen workplace compliance in line with international labour standards, national labour laws and collective agreements. The programme will support government to strengthen enforcement, preventative interventions and workplace compliance;

**Indicator 7.2:** Member States that have improved their institutional capacity or strengthened collaboration with social partners and other institutions and partners to improve workplace compliance; and

**Indicator 7.3:** Member States, social partners and other stakeholders that improve their knowledge and information systems to support workplace compliance.

In the 2018-19 biennium, RMGP II maintained its alignment to Policy Outcome 7 as outlined above. In the 2020-21 biennium, the ILO's P&B has been recast to take into account the contribution of ILO's work to the SDG's as well as the Centenary declaration. Thus, in the 2020-21 biennium, RMGP II will be linked to the following Policy Outcome areas:

Outcome 4: Sustainable Enterprises

Outcome 6: Gender Equality and equal opportunities and treatment for all in the world of work

Outcome 7: Adequate and effective protection

### **The ILO Decent Work Country Programme (DWCP) 2017-2020**

The programme directly supports DWCP outcome 2.2: Promoted implementation of policies, laws and programmes to ensure safe working conditions to strengthen workplace compliance. Overall the programme relates to:

**Priority 2:** Promotion on safe working environment for all workers and in compliance with International Labour Standards

(a) International Labour Standards (ILS) and especially the eight core conventions are promoted and constituents' capacity enhanced for their better implementation;

(b) Implementation of policies, laws and programmes promoted to ensure occupational safety to improve working conditions and ensure a just transition to climate resilient and green economy

**Priority 3:** Promotion of Fundamental Rights at Work through Social Dialogue and Tripartism

(a) Capacity of labour administration enhanced, leading to good governance in labour market

### **2.5.2. Link to National Development Framework**

The Government's Vision 2021 defines several economic and social outcomes for Bangladesh to achieve by 2021. The Vision and the Seventh Five Year Plan (2016-2020) 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 UNDAF 2011-2016 first pillar, Democratic Governance and Human Rights, identified as its first outcome: "Government institutions at the national and sub-national levels are able to more effectively carry out their mandates, including delivery of public services, in a more accountable, transparent, and inclusive manner." The pillar 7 of UNDAF, Gender Equality and Women's Advancement also iterate the importance of action needs to be taken for the economic empowerment of women. The 2011-2016 UNDAF explicitly addresses improvements in the quality, accountability, inclusiveness and transparency of institutions related to safety in the workplace.

It should be noted that United Nations in Bangladesh is currently developing a new United Nations Sustainable Development Cooperation Framework (UNSDCF) covering the period 2021-25. The outcomes under the UNSDCF are to be finalised against which RMGP II and BWB interventions will be aligned.

Both RMGP II and BWB contribute to the following SDG's:

SDG 1 No Poverty

SDG 5 Achieve gender equality and empower of all women and girls

SDG 8 Decent Work and Economic Growth

SDG 9 Industry Innovation and Infrastructure

• The SDG linkages above subsequently contribute to the 2019 Centenary Declaration of the ILO 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

### **3. Purpose and scope of the evaluation**

### **3.1. Purposes of the midterm evaluation**

The main purpose of the independent MTE is for accountability (measure the process, progress, outcome, learning and the achievement of the project in terms of the expected and stated results) and programme improvement. The evaluation will review the approach and design implemented in achieving and/or progress towards outcomes, as well as assess factors (in design and implementation) that have contributed to or impeded achievement of outcomes. The evaluation will also examine the relevance, efficiency, effectiveness, impact, and sustainability of the project. The evaluation will also identify the extent to which project activities have so far contributed towards the achievement of desired outcomes (in comparison with the expected KPI as per the project's log frame), and to draw out and document key lessons learnt as well as to provide a set of recommendations to inform future directions of the ILO's intervention in Bangladesh's RMG sector.

The specific focus of the evaluation should be on the following-:

- 1) Independently assessing the progress of RMGP-II and BWB against the log frame and the progress of BWB II against its Country strategy 2017-2022;
- 2) Informing the ILO whether the current strategy of both programmes is working, and providing recommendations on what could be changed to increase the likelihood that the programmes reach their objectives. The MTE will also analyse the effectiveness of the collaboration between the different programmes in the sector and provide general recommendations on the entire cluster and specific recommendations on the individual projects that make up the cluster;
- 3) Informing the ILO on sustainability, exit strategies and suggest possible revenue generation model beyond donor funding of the two programmes;
- 4) Analysing the changing context of the programmes e.g. Accord and Alliance leaving and RSC's existence, and the underlying factors beyond ILO's control that affected and might affect the achievement of the programme output and outcome
- 5) Identifying good practices and lessons learned that would contribute to learning and knowledge development of the two programmes and their stakeholders.
- 6) Identifying the complementarity BWB brings, especially for factories that have worked with both Accord and Alliance.
- 7) The assessment of significant change within the GOB agencies e.g. DIFE, RCC /ministries that this project works with especially in terms of personnel change. How this change affects the collaboration, ownership and sustainability of GoB?
- 8) Reviewing and assessing the implementation status of the gender action plan and provide recommendation, accordingly the extent to which the programs' respective critical assumptions have held or not held true; and how well the programs' have identified, assessed and managed/mitigated risks (positive and negative) in view of the evolving contextual realities.
- 9) The findings and recommendations from this MTE will serve as a guide in fine-tuning and finalizing the work plan and log frame for the programme until June 2023 and make necessary adjustments as required.
- 10) Assess the existing risk matrix and identify any new risk(s) and recommend mitigation steps.

### **3.2. Scope of the evaluation**

The MTE takes into account the period July 2017 (start of RMGP II) to March 2020 (MTE date) and will cover all geographies covered by the two programmes. The MTE will also cover BWB II country strategy from the start (July 2017) until the time of the evaluation. However, since Better Work operates as a long-term programme, many donors continue to support Better Work regardless of its strategic phases. The evaluation will thus encompass all such contributions that have continued during the period scoped for this evaluation (July 2017 to March 2020). (It should be noted that BWB also has a self-funding component based on subscriptions paid to the program for services rendered).

### **ILO Cross-cutting issues**

The core ILO cross-cutting priorities, such as gender equality and non-discrimination, promotion of international labour standards, environment, tripartite processes, and constituent capacity development should also be considered in this evaluation.

In particular, the gender dimension will be considered as a cross-cutting concern throughout the methodology, deliverables and final report. In terms of this evaluation, this implies involving 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.

### 3.3. 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 departments and in-country partners and stakeholders

## 4. Evaluation criteria and questions

In line with the United Nations' good practices for evaluations, as defined in the ILO Policy Guidelines for results-based evaluation, 2017 (see annex 5), the ILO expects that each evaluation will assess the following key criteria: relevance, coherence, effectiveness, efficiency, sustainability and impact. To the extent possible, data collection and analysis should be disaggregated by sex as described in the ILO Evaluation Policy Guidelines and relevant Guidance Notes.

It is expected that the MTE 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. Suggested evaluation criteria and evaluation questions are summarised below:

### 4.1. 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.*

- Examine whether the RMGP II and BWB II have responded to the needs of the beneficiaries and if these are still consistent and relevant to the needs of the RMG sector of Bangladesh.
- Examine to what extent the RMGP II and BWB programme strategies and approaches are pertinent to stakeholders' (MOLE/DIFE, BFSCD, employers' and workers' organizations) requirements and policies of partners and donors?

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- Are RMGP II and BWB program approaches strategic and in line with the broad ILO action in Bangladesh (DWCP, gender mainstreaming and Strategic Programme Framework, Programme and Budget 2020-2021, SDGs and Centenary Declaration)?
- Have the RMGP II and BWB programme strategies been responsive to changes in the business, socio-economic, political, and institutional environment? To what extent the expected developments in the industry (e.g. automation/ technological development) is already/will impact on the program?
- What are the current areas of interest of the key stakeholders vis-à-vis the programme's original theme? To what extent has the programme adapted to those changes e.g. the departure of the Accord and Alliance whether it will affect RMG sector and BWB?
- Are the intervention strategies of the two programs' appropriate for achieving the stated purpose and what are the lessons learnt in the design and implementation of the two programmes?

### 4.2. Validity of intervention design

*The extent to which the design is logical and coherent.*

- To what extent are the RMGP II and BWB programme designs (objectives, outcomes, outputs and activities) and their underlining theory of change, its modus-operandi, risk analysis, context analysis logical and coherent and address relevant priorities/need?
- Does the RMGP II and BWB have an M&E system in place that collects sex-disaggregated data and monitors gender-related results?
- Does the logical framework/TOC need to be modified in the remaining duration of the two programmes, and why? Are the two programme strategies, outcomes and assumptions appropriate for achieving planned results?
- How appropriate and useful are the indicators described in the logical framework, programme monitoring plan (PMP) in assessing the programme's progress? If necessary, how should they be modified to be more useful?

- Were the risks properly identified, assessed and what recommended risks can be added to be mitigated against?
- To what extent do the two programmes effectively mainstream international labour standard (ILS), tripartite mechanism and social dialogue, gender and non-discrimination, and environmental concerns in programme strategies and interventions?

#### **4.3. Coherence: How well does the intervention fit?**

*The compatibility of the intervention with other interventions in a country, sector or institution*

- The extent to which other interventions and policies support or undermine the RMGP II and BWB interventions, and vice versa.
- The extent of synergies and interlinkages between the RMGP II and BWB interventions and other interventions carried out by ILO Dhaka, Government and social partners.
- Have there been new intervening factors/actors (e.g. other donor assisted programmes) that have emerged since the inception of the programme 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.
- The extent to which that the RMG P II and BWB interventions are in consistent with International Labour Standards, human rights- based approach and gender equality that Bangladesh is to adhere to.
- The extent to which that the RMG PII and BWB interventions have complemented and/or harmonized or well-coordinated with other actors working in the RMG sectors of Bangladesh.

#### **4.4. Intervention progress and effectiveness**

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

- To what extent have planned programme outputs been achieved, in relation to the original programme document, logical framework, performance monitoring plan, and work plans? What obstacles were encountered in programme implementation?
- 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? How did the programme address the capacity challenges?
- Has the programme received adequate administrative, technical and- if needed- political support from the ILO office in the field, technical specialists in the field and the responsible technical unit at headquarters including M&E experts?
- 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*

- Were resources allocated/used strategically to achieve programme outputs and outcomes? Were activities completed in-time/according to work plans? If not, what were the factors that hindered timely delivery and what were the counter measures taken to address this issue.
- To what extent were the programme activities cost-effective? What level of the programme activities (individual, institutional, systemic) provided the most cost-effective benefits?
- To what extent have the two programs leveraged partnerships (with constituents, national institutions, and other UN/development agencies) that enhance the projects' relevance and contribute to Bangladesh's priority of "improved working conditions in the RMG sector" (explicitly or implicitly)
- Were the funding and timeframes sufficient to achieve the intended outcomes?
- Were resources allocated strategically to achieve gender-related objectives?

#### **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 adequate and adapted to fulfil the programme plans? Were the management and governance arrangements of the programme adequate?
- Were institutional arrangements with partners and the role of tripartite constituents appropriate and effective?
- Has the distribution of resources between activities and staff been optimal? What could have been done differently to achieve more effectiveness?
- How effective was the support provided to the programme team by the ILO, donors, and tripartite constituents in delivering results? What could have been done differently?
- To what extent was results-based management implemented in the programme? Does the RMGP II and BWB have an M&E system in place that collects sex-disaggregated data and monitors gender-related results?
- Does the programme team or the backstopping CO team have adequate gender expertise, and/or was technical backstopping sought and received from gender specialists when needed?
- How effectively did the programme monitor programme performance and results? What lessons have been learned and applied since the start of the two programs?

#### **4.7. Impact orientation**

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

- Have the RMGP II and BWB initiatives made a difference to specific higher goals (SDGs, DWCP, Bangladesh national tripartite plan?) to which they are linked? If so, how has the intervention made a difference so far (social, environmental, and economic effects of the intervention)? (explicitly and implicitly) also look if there is evidence that refutes or is not consistent with other research / impact assessments?

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- To what extent do impacts observed provide evidences in support of the findings of the Impact Assessment of Better Work?
- What are lessons and challenges for achieving policy, legislative and strategic change and buyin to create an enabling environment for an efficient and effective culture of industrial safety in the country?
- What are the possible long-term effects on gender equality?

#### **4.8. Sustainability**

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

- Have the two programs developed an effective sustainability plan and exit strategy? If yes, is the proposed plan appropriate to sustain programme results after closure? To what extent were the government and social partners involved in the preparation of the sustainability plan? To what extent could the programmes address the sustainability needs of the partners?
- Which programme results (financial, economic, social and environmental dimensions) appear likely to be sustained after the programme and how? Are results anchored in national institutions and can the partners maintain them financially at the end of the programmes? Identify how the partners perceive that certain programme results will be sustained in the short, medium and long term. What are the constituents' plans to incorporate and continue programme activities in the short, medium and long term?
- To what extent have the national stakeholders acquired the technical, financial and organizational capacities towards ultimately continuing the delivery of BWB services and sustain the results both at industry and policy level?
- Do these services respond to the needs of the constituents and help improve working conditions of the RMG sector?
- To what extent is the role of BWB considered legitimate by stakeholders e.g. role of buyer in terms of accepting and agreeing to have uniform assessment by BWB? How does this affect the programme results, impact and sustainability?
- How the tripartite constituents and other partners viewing their engagement and actions in

relation to ILO's newly adopted Convention on Eliminating Violence and Harassment in the World of Work (C190)?

## 5. Methodology

- The evaluation will comply with evaluation norms, standards and follow ethical safeguards, as specified in the ILO's evaluation procedures including gender sensitive evaluation criterions. 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 following the **OECD/DAC evaluation criterias** as well as will provide inputs that will feed into the remaining programme period.

- The evaluators will work according to the principles of the ILO evaluations and be free of any link to or control of the specific programs being evaluated.

- To get a complete understanding and opinion of the relevant stakeholders on RMGP II and BWB's achievements, the evaluation will primarily use a qualitative method of research. This qualitative method will use a mix of desk review (analysis of relevant reports and data related to the program) and interactions with stakeholders in the field (series of meetings and interviews).

- Quantitative analysis of performance data should be done where possible e.g. budget expenditure

- 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 methodology should clearly state the limitations of the chosen evaluation methods, including those related to representation of specific group of stakeholders

- The quantitative evidences will be acquired mostly from the program's documents, including the Development Cooperation Progress Report (DCPR), quarterly donor reports, the monitoring and evaluation plan, donor reviews (e.g. DFID annual review), workshop and meeting reports and other knowledge products produced by the two programs.

- The evaluation tools may include but are not limited to Desk review (document review and data review), semi-structured interviews and focused group discussions.

- The evaluators will conduct face-to-face semi-structured interviews (or via Skype when necessary) and with ILO officials, donors and constituents in Bangladesh during a three-weeks long field mission from **March 29 to 19 April 2020**. 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.

- A complete list of interviewees (**complete with name, title, organisation, email address and contact numbers**) and visits must be annexed in the final evaluation report.

- The evaluators will structure the data collection instruments according to the evaluation questions listed under Section 4 and as agreed with the programme and the donors. Although questions may be highly detailed, the evaluators will adapt them and add additional questions as appropriate, consistent with the semi-structured nature of the interviews. Emphasis may vary and weight may be placed on questions in order to optimise the use of time.

- 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 programs donors.

- The stakeholders' workshop will be followed by a debriefing session 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 crosschecking

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, to participate in the evaluation process, and provide inputs to a draft evaluation report.
- The detail approach and methodology, including the work plan, should be part of the inception 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

## **6. Main Deliverables**

The main deliverables of this evaluation are as follows:

### **6.1 Inception report**

The inception report will include among other elements the evaluation questions, data collection methodologies and techniques, the evaluation tools and instruments (interview, guides, questionnaires, etc.). The data collection instruments needs to make provisions for the triangulation of data where possible. The evaluator will prepare an inception report as per the ILO Checklist 3: Writing the inception report.

### **6.2 Stakeholders' workshop and Microsoft PowerPoint presentation on preliminary evaluation findings**

A final national stakeholder validation workshop will be conducted in Dhaka to share the preliminary findings with the ILO and local stakeholders at the end of evaluation mission. The workshop will be organized by the RMGP-II team with assistance from the ILO Country Office in Dhaka. Evaluation findings should be based on facts, evidence and data. This precludes relying exclusively upon anecdotes, hearsay and unverified opinions. Findings should be specific, concise and supported by triangulation of quantitative and qualitative information derived from various sources to ensure reliability, validity and generalization. A presentation will be prepared and delivered by the evaluators for this workshop.

### **6.3 First draft evaluation report**

The evaluation report will include and reflect on findings from the fieldwork and the stakeholders' workshop. The draft evaluation report will be prepared as per the ILO Checklist 5: Preparing the Evaluation Report. The first draft report will be improved by incorporating all comments and inputs provided by key stakeholders.

### **6.4 Final evaluation report with evaluation summary**

The evaluators will incorporate comments received from ILO and other key stakeholders into the final evaluation report. The report will be finalized as per the ILO Checklist 5: Preparing the Evaluation Report. The quality of the report and evaluation summary will be assessed against the ILO Checklists 5, 6, 7, and 8.

There may be more than one rounds of comments from ILO stakeholders. Evaluation report is considered final only when it has received an approval from ILO evaluation Office.

The reports and all other outputs of the evaluation will be produced in English. All draft and final reports including other supporting documents, analytical reports, and raw data will be provided in electronic version compatible with WORD for windows.

## **7. Management Arrangements and Work plan**

- A designated evaluation manager, Ms Pamornrat Pringsulaka, Regional Evaluation Officer, who has no prior involvement in the program will manage this evaluation with oversight provided by the ILO Evaluation Office.
- A team (international and national evaluators) will be commissioned to conduct the evaluation. The evaluation team reports to the evaluation manager.
- The evaluation will be funded from RMGP-II and BWB programs. The contributions to a joint evaluation budget will be proportional to programs' size and donor contribution.
- The list of the tasks of the evaluation manager are as follows:
  - Draft and finalize the evaluation TORs upon receiving inputs from key stakeholders;

- Advertise/tender the evaluation
  - Review proposals and CVs of the proposed evaluators and make a selection;
  - Provide all background documents to the evaluators;
  - Coordinate with RMGP II and BWB on the field visit agenda of the evaluators;
  - Briefing the evaluators on ILO evaluation procedures;
  - Circulate, gather and consolidate input/feedback to the initial MTE report from all concerned
  - Review and provide inputs/feedback/comments to the draft MTE report; and
  - Share inputs/feedback/comments with the evaluators, to be integrated in the final report.
  - ILO Country Office for Dhaka, RMG -II and BWB teams will handle administrative contractual arrangements with the evaluators and provide any logistical and other assistance as required.
  - RMGP-II and BWB II team will be responsible for the following tasks:
    - Gather all program background materials for the MTE;
    - Prepare a list of recommended interviewees/stakeholders;
    - Schedule meetings for field visit and coordinating in-country logistical arrangements, including travel arrangements (e.g. plane and hotel reservations, purchasing plane tickets, providing per diems) and all materials required.
    - Organize and participate in the stakeholder workshops;
    - Be interviewed and provided inputs as requested by the evaluators during the evaluation process;
    - Review and provide comments on the draft evaluation reports.
  - The evaluation team will report to the evaluation manager. The evaluation team will compose of two persons, an international consultant and a national consultant, selected through a competitive process from qualified consultants. The international consultant will lead the evaluation and will be responsible for delivering the above evaluation deliverables using a combination of methods as mentioned above.
  - The international consultant will have final responsibility for above described deliverables. The national consultant (a national of Bangladesh) will support the team leader in conducting a participatory and inclusive evaluation. Specifically, the national consultant will be responsible for:
    - collect background information and preparing a summary in English as required;
    - contribute to a desk review of relevant program and non-program documents;
    - pro-actively provide relevant local knowledge and insights to the international consultant;
    - take part in the interviews with key stakeholders and assisting the international consultant in taking notes during interviews, and to write brief reports based on main observations and conclusions;
    - contribute to the main report to be prepared by the international consultant (team leader).
- The national consultant may be requested to write certain sections in the draft and final report as requested by the international consultant (team leader);
- participate in and jointly facilitate the stakeholders workshop; and
  - provide interpretation during the evaluation mission as required.

## 7.2 Required Qualifications and Duration

Independent consultants – one international evaluation specialist/team leader and one national evaluator/team member with the relevant experience and qualifications are being sought.

### ***International Evaluation Specialist/Team Leader***

Desired skills and competencies:

- No previous involvement in the delivery of RMG program;
  - Master's Degree with minimum 10 years of strong and substantial experience in program evaluations;
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- An evaluation expert in development field with demonstrated technical expertise in evaluation methodologies and previous proven skills and experience in undertaking evaluations of similar programs;
  - Strong background in organizational and institutional capacity building, Human Rights-Based

Approach programming, and Results-Based Management and Monitoring;

- Extensive knowledge of, and experience in applying, qualitative and quantitative research methodologies;
- Excellent analytical skills and communication skills;
- Demonstrated excellent report writing skills in English;
- Knowledge of ILO's roles and mandate, its tripartite structure, and understanding on gender equality issues and ILO cross-cutting issues as well as UN evaluation norms and its programming is desirable;
- Experience in participatory evaluation techniques is desirable;
- Experience in ready-made garment sector, social dialogue and industrial relations in emerging economies will be an advantage; and
- Working experience in Bangladesh will also be an advantage.

***National Evaluator/Team Member***

Desired skills and competencies:

- No previous involvement in the delivery of the RMG program;
- Master's Degree with minimum 7 years of strong and substantial professional experience working on ready-made garment sector social dialogue and industrial relations issues in Bangladesh;
- S/He should be knowledgeable in program evaluation methodologies, programming and organizational and institutional capacity building;
- Excellent analytical skills, writing and interview skills;
- Excellent command of oral and written English;
- Bengali language skills;
- Sound knowledge on the socio economic conditions of Bangladesh and gender equality and non-discrimination is desirable
- Knowledge of ILO's roles and mandate and its tripartite structure as well as UN evaluation norms and its programming will be an advantage; and
- Experience in participatory evaluation techniques will be an advantage.

## Annex B. List of persons interviewed

Stakeholder Group	Total	Total	Male	Female
ILO Bangladesh Country Office team and other ILO project managers	<ol style="list-style-type: none"> <li>1. Mr Tuomo Poutiainen, Country Director</li> <li>2. Mr Saidul Islam, Programme Officer</li> <li>3. Ms Khadija Khondaker, Programme Officer</li> <li>4. Mr Iqbal Nandra, Communications Specialist</li> </ol>	4	3	1
ILO regional and HQ specialists/managers	<ol style="list-style-type: none"> <li>1. Mr. Tsuyoshi Kawakami Regional OSH Specialist</li> <li>2. Ms Aya Matsuura Regional Gender Specialist</li> <li>3. Mr. Andrew Christian LABADMIN Labour Inspection Specialist</li> <li>4. Mr Conor Boyle, Head of Programme Development, Learning and Country Programmes BW Global</li> <li>5. Ms Deborah Schmidiger, Regional BWB Global</li> </ol>	5	3	2
RMGP II Programme Team and subcontractor Reps	<ol style="list-style-type: none"> <li>1. Mr George Faller, CTA, RMGP II</li> <li>2. Ms Belinda Chanda, Operations and Programme Support Specialist</li> <li>3. Mr Maurice Brooks, Workplace Specialist.</li> <li>4. Mr Md. Ashiqur Rahman Ripon, Programme Officer</li> <li>5. Mr Abu Yousuf, Governance Officer</li> <li>6. Mr Satil Mahmud, Building Safety Officer</li> <li>7. Ms Syeda Munira Sultana, Programme Officer, LIOSH</li> <li>8. Mr Borhan Uddin, IKM officer</li> <li>9. Ms Shammin Sultana, Gender Mainstreaming officer</li> <li>10. Ms Onchita Shadman, Communications Officer</li> <li>11. Mr Alam Mostofa, Financa/Admin</li> <li>12. Ms Sohana Samrin Chowdhury, M&amp;E</li> <li>13. Mr Major Kazi Wahidul HAQUE (Retd)</li> </ol>	13	08	05
BWB Programme Team	<ol style="list-style-type: none"> <li>1. Ms Anne-Laure Henry-Greard, Program Manager</li> <li>2. Ms Jenny Hickey, Assistant Program Manager</li> <li>3. Mr Abu Huda, Communications Officer, BWB</li> </ol>	5	1	4

	<ol style="list-style-type: none"> <li>4. Ms. Farzana Islam, Team Leader</li> <li>5. Mr Shah Alam, Finance officer</li> </ol>			
Ministry of Labour and Employment (MOLE)	<ol style="list-style-type: none"> <li>1. Dr Molla Jalal Uddin, Additional Secretary</li> <li>2. Mr. Humayun Kabir, Deputy Chief, Labour</li> <li>3. Mr. S M Mikhail Islam, Sr. Assistant Chief, International Organization</li> <li>4. Mr. A K M Salehuddin, Project Director, Remediation Coordination Council</li> <li>5. Mr. Mehedi Hasan, Directorate of Inspection of Factory and Eshtablishment</li> <li>6. Md. Abdul Awal, Assistant Inspector General (Safety)</li> <li>7. Mr. Abul Bashar, Labour Inspector (Safety)</li> <li>8. Shanta Deb Labour Inspector (Safety)</li> <li>9. Shakil Md. Sultan CAP engineer</li> <li>10. Md. Shaharu Hossan, CAP engineer</li> <li>11. Mehedi Hasan Shohag, CAP engineer</li> </ol>	10	9	1
Workers' Organizations	<ol style="list-style-type: none"> <li>1. Mr Hadayetul Islam, President, IndustriALL Bangladesh Council</li> <li>2. Ms China Rahman, General Secretary, IndustriALL Bangladesh Council</li> <li>3. Mr Anwar Hossain, President, National Coordination Committee on Workers Education</li> </ol>	3	2	1
Employers' Organizations	<ol style="list-style-type: none"> <li>1. Mr. Farooq Ahmed, Secretary General, Bangladesh Employers Federation</li> <li>2. Mr. Santosh Kumar Dutta, Joint Secretary, Bangladesh Employers Federation</li> <li>3. Mr. Md. Rafiqul Islam, Additional Secretary, Bangladesh Garment Manufacturers and Export Association</li> <li>4. Ms. Farzana Sharmin, Joint Secretary(Compliance), Bangladesh Knitwear Manufacturers and Export Association</li> <li>5. Shamin Ehsan, Bangladesh Knitwear Manufacturers and Export Association</li> </ol>	8	7	1

	<ol style="list-style-type: none"> <li>6. Hasan Mahmoud, Bangladesh Garment Manufacturers and Export Association</li> <li>7. ANM Saifuddin, Bangladesh Garment Manufacturers and Export Association</li> <li>8. Md. Masud Karim, Additional Secretary, Bangladesh Garment Manufacturers and Export Association (member of RCC taskforce)</li> </ol>			
Other Stakeholder Organizations	<ol style="list-style-type: none"> <li>1. Ms Adiba Mehnaz Ahmed, International Finance Corporation</li> <li>2. Ms Wendy Werner, Country Manager (Bangladesh, Bhutan and Nepal), International Finance Corporation</li> <li>3. Ms Mayang Sari, Nutrition Specialist, UNICEF</li> <li>4. Mr Zafor, Technical Expert, Bangladesh Investment Development Authority</li> <li>5. Dr. Mehedi Ahmed Ansary, Professor, Bangladesh University of Engineering and Technology (RCC taskforce)</li> <li>6. Dr. Md. Ziaur Rahman Khan, Professor, Bangladesh University of Engineering and Technology (RCC taskforce)</li> </ol>	6	3	3
Donors	<ol style="list-style-type: none"> <li>1. Mr Bas Blaauw, First Secretary (Economic Affairs), Netherlands</li> <li>2. Ms Mahjabeen Quader, Senior Advisor (Economic Affairs and CSR) Netherlands</li> <li>3. Ms Laura VanVoorhees USDOL</li> <li>4. Ms Lili Bacon, USDOL</li> <li>5. Mr Keith Goddard, USDOL</li> <li>6. Ms Ameena Chowdhury, Programme Manager, SDC</li> <li>7. Ms Trina Oviedo, First Secretary (Development), Canada Embassy</li> <li>8. Ms Afsana Islam, DFID</li> <li>9. Mr Shahrukh Shakir, DFID</li> </ol>	9	3	6

Brands	10. Ms Tamanna Sarwar, GAP	1	0	1
National Initiative Factory Manager	1. Mr. Humayun Rashid, Premier Leasing & Investment Limited	1	1	0
<b>Total</b>		<b>65</b>	<b>40</b>	<b>25</b>

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