



# Evaluation Summary



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

### Quick Facts

**Countries:** Bangladesh

**Mid-Term:** October 2020

**Evaluation Mode:** Independent

**Administrative Office:** ILO Country Office for Bangladesh

**Technical Office:** Labour Administration and Inspection

**Evaluation Manager:** Ms. Pamornrat Pringsulaka, Regional M&E Officer

**Evaluation Consultant(s):** Ms. Sandy Wark, team leader, Dr. Shantanu Majumder, national consultant

**Project Code:** BGD/19/05/MUL, BGD/16/50/AUS, BGD/18/01/CEF, BGD/17/51/MUL, BGD/12/50/USA, BGD/18/04/GAP

**Donor(s) & Budget:** DFID, Netherlands Ministry for Foreign Trade and Development Cooperation, DFATD Canada, Department of Foreign Affairs and Trade, Australia, UNICEF, Swiss State Secretariat for Economic Affairs SECO, Danish and German, USDOL, GAP Inc.

RMGP II - USD 24.5 million, BWB II and affiliated – USD18.4 million

**Keywords:** OSH, Labour Inspection, Better Work, International Labour Standards, Compliance

### Background & Context

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. From 2013 to 2017, the ILO implemented Improving Working Conditions in the Ready-Made Garment Sector (RMGP) funded by Canada, the Netherlands and the United Kingdom and launched Better Work Bangladesh (BWB). The second phase of RMGP (RMGP II 2017-2023) and BWB and its associated sub-projects continued ILO efforts to promote safe and decent working conditions. RMGP II works to ensure factory safety by (i) supporting the Ministry of Labour and Employment's (MOLE) efforts to oversee National Initiative (NI) factories' remediation of structural, fire and electrical issues, (ii) improving Government of Bangladesh (GOB) agencies concerned with factory safety's effectiveness, especially the Department of Inspection for Factories and Establishments (DIFE), (iii) improving OSH policy and practices and (iv) by contributing to BWB. BWB, which launched in Bangladesh in 2014, set out to improve RMG factory compliance with International Labour Standards (ILS) and national laws by offering its core services to an expanded number of factories, supporting a policy and business environment that protects workers' rights and boosts competitiveness, and empowering women, reducing sexual harassment and closing the gender pay gap. During the period 2017 to the present (September 2020), 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.

### Purpose, scope and clients of the evaluation

This independent mid-term evaluation of RMGP II and BWB covers 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 final implementation period. The evaluation's main users include: RMGP II and BWB managers, the ILO country office (CO), regional and global technical support teams, tripartite constituents and other implementing partners, as well as donors and other stakeholders endeavoring to improve safety and overall working conditions in Bangladesh's RMG sector.

### **Methodology of evaluation**

The two-person evaluation team conducted the evaluation from April to September 2020 using entirely remote data collection methods because of coronavirus pandemic-related travel and safety restrictions. The evaluators relied upon both qualitative and quantitative data collection methods including document review, key informant and group interviews, online surveys and RMGP II and BWB monitoring and evaluation data.

## **Main Findings & Conclusions**

### **Relevance, Design Validity, Coherence**

RMGP II efforts to improve industrial safety, OSH policy and practice as well as build Labour Inspectorate capacity were highly relevant given the RMG sector's importance in Bangladesh's economy and the country's 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 demonstrating to international brands and buyers that goods sourced from Bangladesh respect ILS and national labour laws. However, RMGP II's significant focus on government capacity building did not satisfy workers' and employers' organizations expectations and perceived capacity building needs. For its part, BWB relevance to factory-level stakeholders' and their brand partners' needs was overall high while national level ILO constituents, which still have limited direct collaboration, perceived BWB largely unfavourably.

Intervention strategies engaged tripartite bodies and aimed to help national counterparts uphold ILS and integrate 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, multinational frameworks on sustainable supply chains and to the Sustainable Development Goals.

RMGP II and BWB intervention 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 I factory audits and appear relatively well designed to strengthen enforcement. Additional interventions appear needed to upgrade NI factories and preserve employment. 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. 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.

Evaluation findings show that the coronavirus pandemic has resulted in 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 employment and social protection being major constituent concerns. Although donors perceived adaption might have been more proactive, 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 useful and well-appreciated by national stakeholders. The CO, RMGP II and BWB leaders appeared cognizant that national priorities and needs were shifting and that a revision of existing RMGP II and BWB intervention strategies as well as related output and outcome indicators would be necessary.

## 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 partially 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

### Main recommendations and follow-up

#### 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

#### 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
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### **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

### **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

### **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