
**EXTERNAL FINAL EVALUATION
OF THE
*IMPROVING FIRE AND BUILDING SAFETY FOR
BANGLADESH'S RMG WORKERS PROJECT***



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ASSOCIATES**
INTERNATIONAL

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LIST OF ACRONYMS

Accord	The Accord on Fire and Building Safety in Bangladesh
AGWF	Akota Garment Workers Federation
Alliance	The Alliance for Bangladesh Worker Safety
BGIWF	Bangladesh Garment and Industrial Workers Federation
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BIGUF	Bangladesh Independent Garment Workers Union Federation
BLA	Bangladesh Labor Act 2006
BRGWF	Bangladesh Revolutionary Garments Workers Federation
BWB	Better Work Bangladesh
CBA	Collective Bargaining Agreements
CDA	Chittagong Development Authority
DIFE	Directorate of Inspection of Factories and Establishments
EPZ	Export Processing Zone
EU	European Union
F&BS	Fire and Building Safety
FSCD	Bangladesh Fire Service and Civil Defense
GDP	Gross Domestic Product
GOB	Government of Bangladesh
GOR	Grant Officer's Representative
GSP	Generalized System of Preferences
GWSF	Garments Workers Solidarity Federation
ILAB	Bureau of International Labor Affairs
ILO	International Labor Organization
OPRE	Finance Department and Office for Performance Reporting and Evaluation
OSH	Occupational Safety and Health
PWD	Public Works Department
RAJUK	Rajdhani Unnayan Karttripakkha, Capital Development Authority
RCC	Remediation Coordination Cell
RMG	Ready Made Garments
SC	Solidarity Center
SGSF	Sommilito Garments Sromik Federation
SMO	Safety Monitoring Organization
TOR	Terms of Reference
UFGW	United Federations of Garment Workers

USAID	United States Agency for International Development
USD	United States Dollar
USDOL	United States Department of Labor
WEP	Workers Empowerment Program

EXECUTIVE SUMMARY

Introduction

USDOL provided a USD 1 million grant to the Solidarity Center (SC) to implement the *Improving Fire and Building Safety for Bangladesh's RMG Workers* project (hereafter referred to as the SC F&BS project). The project started implementing activities on September 30, 2013 and was scheduled to end on September 29, 2017. However, the SC F&BS project requested and received a cost extension through a grant modification that added USD 200,000 to the grant and extended the end date to March 31, 2019. SC requested the grant modification to reinforce training and establish sustainability mechanisms that includes developing a cadre of master trainers and a data management system

The project's *overall objective* is to improve the representation and protection of workers in the RMG sector related to fire and general building safety. The *long-term outcomes* of the SC F&BS project include:

1. Improved capacity of workers and worker organizations to engage in effective dialogue with the Government of Bangladesh (GOB) and employers on fire and general building safety strategic plans, including national action plan (NAP) and related initiatives;
2. Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate GOB authorities and/or factory managers; and
3. Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.

The project targets ready-made garment (RMG) workers and their representative organizations in Dhaka and Chittagong, where RMG factories are concentrated since the majority of registered factory-level unions are located in these two cities. The SC F&BS project works with independent trade unions that have demonstrated a commitment to organizing and representing workers in the RMG sector. The direct beneficiaries include worker leaders from organized RMG factories, RMG trade union federations, fire safety committee members in targeted RMG factories, and RMG factory managers and owners.

Findings and Conclusions

Relevance

Although some momentum has been lost since the Rana Plaza building collapse in 2013, fire and building safety remains a priority due to the pressure placed on the government by international buyers, governments, and non-governmental organizations (NGO). While the government is committed to ensuring fire and building safety, it lacks the capacity and, in some cases, the motivation to ensure fire and building safety. To address the government's

lack of capacity, the International Labour Organization has helped the government establish the remediation coordination cell (RCC), which provides inspection and remediation services. While the RCC is expected to transition into a national regulatory body, it appears that the transition will take many years making initiatives like the Accord, Alliance, and other NGO programs indispensable.

Validity of Project Design

The development objective does not clearly describe the impact the project's strategy aims to achieve. The project's capacity building activities are intended to translate into decreased risk and fewer fire-related accidents, deaths, and injuries. The theory of change would be better served if the development objective had been stated in these terms. The outcomes, on the other hand, are clearly written, reflect improvements in knowledge and practices, follow a tight cause and effect causal logic, and contribute to improved fire and building safety in RMG factories. The four assumptions identified in the original project document were realistic and generally held true throughout the life of the project.

The evaluator was not able to determine whether the theory of change was validated through project implementation because the project's performance monitoring plan (PMP) does not include the appropriate impact or effect level indicators to measure the achievement of outcomes. Based on anecdotal information ascertained during interviews, the evaluator believes that union leaders and, to a certain extent, general workers improved their knowledge of fire and building safety risk and have taken important actions to address the risk.

Project Performance

The project is on track to achieve or overachieve nearly all of the indicator targets. The project has 13 effect level indicators that attempt to measure changes in knowledge, behavior, or practices. However, some are not well defined and others are difficult to verify. The project would have benefited from a more rigorous monitoring and evaluation (M&E) system including baseline and endline surveys measuring changes in a core set of well-defined fire and building safety indicators such as safety hazards, fires, and other incidents. The lack of a baseline data made it difficult to fully validate the project's theory of change.

Effectiveness of Strategies

The training resulted in an increase in knowledge on fire safety and general building hazards and practices including inspections and how to report hazards. Trade union leaders use lunch breaks to talk to fellow workers about fire and building safety hazards. Union organizers and leaders also collaborated with the SC to conduct joint workplace training on fire and building safety for workers. Training effectiveness can be improved by conducting more joint workplace training with managers, providing more frequent refresher training to union leaders and workers, using relevant video clips about fire and building safety, and using more dynamic and participatory training methodologies.

The fire and building safety certification course helped improve union leaders' abilities to engage factory managers in a dialogue regarding workplace safety issues and seeking

remediation with the DIFE, Accord, or Alliance. The fire and building safety certification course also helped increase union leaders' self-confidence and respect from management and co-workers. Some union leaders are taking on new leadership roles in the factory and in their communities.

Trade union leaders face a range of challenges in addressing fire and building safety hazards, which include the threat of being fired if they report safety hazards, difficulty in convincing factory managers to allow workers to participate in fire and building safety training, and convincing families of some union leaders to allow them to participate in the project's activities.

Efficiency and Use of Resources

The project's country staffing structure, which consists of the project director and program officer, is highly cost-effective since it accounts for only 13 percent of the total budget. However, when SC headquarters personnel and indirect rate costs are added, the project becomes less cost-effective. The evaluator was unable to identify duplicity of expenditures between the ILO and SC F&BS projects. These projects have different strategies, activities, and target groups.

The project's budget is underspent by nine percent. To expend the remaining funds in the budget by March 31, 2018, the project will need to increase its monthly expenditures from USD 16,260 to USD 28,943. The project needs a clear plan and revised budget to ensure that grants funds are fully expended by the end of the project.

The amount allocated to the three outcomes is USD 1,026,663. Approximately, 42 percent of the total is allocated to Outcome 1, which is reasonable since it includes the fire and building safety certification training for union organizers and leaders. Twenty-nine percent of the total outcome budget is allocated to Outcome 2 and another 29 percent is allocated to Outcome 3. The evaluator considers the allocation resources to the outcomes adequate.

Effectiveness of Project Management

The project staffing consists of the project director and program officer. Fire and building safety experts were hired to deliver the training for the certification course. The SC country program director and administrative and finance staff provided support to the project. While the staffing structure is highly efficient and adequate for achieving the three outcomes, the overall effectiveness could have been increased by including a technical program officer for the three main technical areas: fire safety, building structure integrity, and electrical hazards.

While the objectives and target groups of the ILO F&BS project and the SC F&BS project were significantly different, the two projects could have collaborated more on fire and building safety training for trade union leaders and workers aimed at reducing risks in the NAP factories. The project collaborated closely with the Accord because it employs a tripartite approach that includes trade unions and it has an effective complaint mechanism supported by the threat of factories losing orders from the Accord signatory brands if factories do not address fire and building safety hazards. While the project has invited the

Directorate of Inspection of Factories and Establishments (DIFE), Bangladesh Fire Service and Civil Defense (FSCD), and Bangladesh Garment Manufacturers and Exporters Association (BGMEA) to participate in the certification courses, they have not collaborated formally with the SC F&BS project. Written agreements with these agencies would have facilitated more formal collaboration.

Sustainability

The project has made significant progress in achieving the indicator targets associated with the sustainability plan. This includes an existing *training curriculum*, 389 *worker resource people* trained, 25 collective bargaining agreements (CBA) with fire and building safety language, and important linkages created between the trade unions and the FSCD, DIFE, Accord, and Alliance. The project has also trained 24 master trainers and is in the final stages of developing the data management system.

Those outcomes and outputs most likely to be sustained are fire and building safety knowledge and skills (short-term), fire and building safety remediation in the Accord factories, federations disseminating fire and building safety information to members, joint workplace training in committed factories, the CBAs, and the data management system by the more capable federations who have the resources (human and financial) to operate the system. The outcomes and outputs least likely to be sustained are fire and building safety knowledge and skills (long-term), fire and building safety remediation in the Alliance and NAP factories, joint workplace training not supported by committed factories, and training conducted by the master trainers (federations).

Lessons and Good Practices

The evaluator identified a range of lessons and good practices, which could be replicated in other countries by both USDOL and the SC.

- Fire and building safety training could include related OSH issues such as the hygiene, management of dangerous chemicals and the use of personal protective equipment, which helps make factories safer for workers.
- Projects can leverage the OSH training to build trust and confidence between trade unions and factory management. Working with factory management to resolve OSH issues is less contentious than working on minimum wages, benefits, work hours, and production targets.
- Fire and building safety training provides new technical knowledge and skills to trade union leaders that helps build their confidence and earns new respect from co-workers and factory managers making them stronger leaders in the factories and in their communities.
- Training trade union leaders and factory managers together improves relationships between trade unions and management and increases the likelihood that management will work to resolve fire and building safety hazards.
- The remediation of fire and building safety risk (including broader OSH issues) is greatly facilitated when there is economic pressure on factories to comply with

standards. For example, the SC F&BS project was most successful in achieving its indicator targets in Accord factories because the Accord signatory brands agreed to cancel orders with factories that do not comply with its safety standards.

Recommendations

1. Develop Accelerated Expenditure Plan

The SC F&BS project should develop a plan, including an adjusted budget, to expend the remaining funds in the grant before the project ends on March 31, 2019. The budget is underspent by nine percent with approximately ten months remaining before the project ends. To expend the remaining funds, the project needs to nearly double its monthly expenditures from USD 16,260 to USD 28,943. The accelerated expenditure plan, however, should be carefully crafted so it does not jeopardize the chances of sustaining key outcomes and outputs.

2. Revise Sustainability Plan

The SC F&BS project should revise its sustainability plan to focus capacity building efforts on those federations and factory level trade unions that are the strongest and most organized and motivated to continue to address OSH activities in factories through safety committees. The plan should also require federations and their factory level trade unions to plan and conduct OSH activities for workers without the financial assistance of the project. Finally, it should include activities to strengthen the linkages between the trade unions and institutional fire and building safety resource organizations such as the Accord, Alliance, FSCD, and DIFE for the NAP factories, which could involve signing formal agreements between the federations and these organizations.

3. Improve Training Methodologies

The SC F&BS project should incorporate more participatory, adult learning methods into future training sessions to increase training effectiveness. In addition to these principles of adult learning, future training should incorporate problemsolving exercises, role playing, and appropriate use of fire and building safety tools.

4. Combine Fire and Building Safety and OSH

When funding or implementing similar projects in the future, USDOL and SC should consider combining fire and building safety with related OSH issues such as the management of dangerous chemicals and the use of personal protective equipment.

5. Leverage OSH to Strengthen Union Leadership

USDOL and SC should use OSH, including fire and building safety, as a lever to strengthen union leadership and improve relations between factory management and trade unions in future projects that have similar objectives. Learning to collaborate with factory management on less controversial OSH issues can pave the way to constructively engage

management on more controversial issues such as minimum wage, work hours, and production targets.

6. Develop Robust M&E Systems

USDOL and SC should develop more robust M&E systems for future projects they fund or implement. While, in general, the SCF&BS project has a logical project design and theory of change, its M&E system lacked the rigor required to provide evidence that the outcomes were achieved and, ultimately, fire and building safety in RMG factories improved. The M&E system should also include practical baseline and endline surveys to assess changes in the effect and impact level indicators.

I. CONTEXT AND PROJECT DESCRIPTION

1.1. Context

Bangladesh Ready Made Garment Industry

The ready-made garment (RMG) industry is an extremely important source of jobs and revenue for Bangladesh's economy. Exports of textiles and garments are the principal source of foreign exchange earnings. In 2017, the RMG industry generated USD 34.83 billion, which was 81 percent of the total export earnings in exports and 12 percent of the gross domestic product (GDP). Bangladesh is the second largest exporter of RMG behind China. Sixty percent of the export contracts of western brands are with European buyers and about forty percent with American buyers. The Bangladesh Garment Manufacturers and Exporters Association (BGMEA) estimates that there are approximately six thousand RMG factories that employ between four and five million workers.

The RMG industry, however, is plagued with labor-related problems including non-compliance with the International Labour Organization's (ILO) international labor standards. Through Presidential Proclamation in June 2013, the U.S. Government suspended eligibility for Generalized System of Preferences (GSP) for the Government of Bangladesh due to a lack of progress on labor reforms.¹

A series of deadly industrial accidents that occurred between November 2012 and May 2013 brought worker safety and labor violations in Bangladesh to world attention. The most significant and deadly accident was the collapse of the Rana Plaza building in Savar district on April 24, 2013. Government officials estimate the death toll to be 1,134 and approximately 2,500 injured. It is considered the deadliest garment-factory accident in history. The fire at the Tazreen Fashion factory occurred on November 24, 2012 and killed 117 persons and injured another 200 making it the deadliest factory fire in the nation's history.

USDOL Bangladesh Program

The suspension of GSP and the industrial accidents, especially the collapse of the Rana Plaza building, strongly influenced United States Department of Labor's (USDOL) technical assistance program in Bangladesh. The Bureau of International Labor Affairs (ILAB) funded a range of projects aimed at addressing legal and policy issues concerning workers' rights and workplace safety in the RMG sector, shrimp-processing sector, and broader concerns relating to Bangladesh's labor law regime, including the separate laws and governance structure for Bangladesh's Export Processing Zones (EPZs). The projects included the ILO's *Fundamental Principles and Rights at Work*, *Improving Fire and Building Safety in Bangladesh's RMG Sector*, and *Better Work Bangladesh*. ILAB also

¹ www.dol.gov/ilab/trade/preference-programs/bangladesh-gsp.htm

funded the Solidarity Center to implement the *Improving Fire and Building Safety for Bangladesh's RMG Workers* project.

Improving Fire and Building Safety for Bangladesh's RMG Workers

USDOL provided a USD 1 million grant to the Solidarity Center (SC) to implement the *Improving Fire and Building Safety for Bangladesh's RMG Workers* project (hereafter referred to as the SC F&BS project). The project started implementing activities on September 30, 2013 and was scheduled to end on September 29, 2017. However, the SC F&BS project requested and received a cost extension through a grant modification that added USD 200,000 to the grant and extended the end date to March 31, 2019. SC requested the grant modification to reinforce training and establish sustainability mechanisms that include developing a cadre of master trainers and a data management system

The project's *overall objective* is to improve the representation and protection of workers in the RMG sector related to fire and general building safety. The *long-term outcomes* of the SC F&BS project include:

1. Improved capacity of workers and worker organizations to engage in effective dialogue with the GOB and employers on fire and general building safety strategic plans, including NAP and related initiatives;
2. Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate GOB authorities and/or factory managers; and
3. Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.

The project targets RMG workers and their representative organizations in Dhaka and Chittagong, where RMG factories are concentrated since the majority of registered factory-level unions are located in these two cities. The SC F&BS project works with independent trade unions that have demonstrated a commitment to organizing and representing workers in the RMG sector. The direct beneficiaries include worker leaders from organized RMG factories, RMG trade union federations, fire safety committee members in targeted RMG factories, and RMG factory managers and owners. The project's *indirect* beneficiaries include workers in the target factories who do not participate in workplace trainings but benefit from the knowledge shared and services rendered by trained worker leaders, union federations, and factory managers.

The SC F&BS project's primary interventions include fire and building safety certification courses, the coordination of engagement between worker representatives and other stakeholders of existing fire and building safety initiatives, factory-level safety and remediation trainings (for workers and managers), and support to workers and unions to file reports on safety violations or hazards to factory managers or appropriate government authorities.

II. EVALUATION PURPOSE AND METHODOLOGY

2.1. Evaluation Purpose

The overall purpose of the SC F&BS project final evaluation is to provide USDOL and SC with an independent assessment of the project's performance and experience. Specifically, the evaluation is intended to achieve the following objectives.

1. To review the achievements and performance of the project (extent to which the objectives, outcomes and targets have been achieved).
2. To identify additional opportunities (entry points) and lessons learned as input for other initiatives for similar fire and building safety projects in Bangladesh and elsewhere.
3. To identify lesson learned and good practices that have bolstered the sustainability of the results achieved.

USDOL and SC developed a set of questions to guide the evaluation. The questions address key issues in (1) relevance; (2) validity of project design; (3) project performance; (4) effectiveness of interventions; (5) efficiency and use of resources; (6) effectiveness of project management; (7) sustainability; and (8) good practices and lessons learned. The evaluation questions appear in the Terms of Reference (TOR) in Annex A.

This final evaluation should also provide USDOL, SC and its trade union partners, the Government of Bangladesh (GOB), and other project stakeholders an assessment of the project's experience in implementation, its impact on project beneficiaries, and the likelihood of sustaining key outputs, outcomes, and impacts.

2.2. Methodology

Evaluator. *Dan O'Brien*, founder and president of OAI, is a seasoned labor evaluation expert that has conducted more than 25 evaluations for USDOL, the SC, and the ILO. Dan conducted the midterm evaluation of the SC F&BS project as part of the USDOL multi-project evaluation in 2015. In addition to conducting the SC F&BS project midterm evaluation, Dan has evaluated worker organization strengthening projects in Bangladesh, Peru, El Salvador, Guatemala, Nicaragua, Costa Rica, Honduras, and the Dominican Republic. Dan has also evaluated ILO Better Work projects that addressed a combination of labor compliance issues in the RMG sector including occupational and safety and health. The evaluations of Better Work projects include Bangladesh, Jordan, Lesotho, Nicaragua, and Haiti.

Evaluation Schedule. The evaluation was conducted from June 11 to July 20, 2018. The evaluator contributed to the development of the TOR, reviewed project documents, and developed interview tools prior to carrying out fieldwork in Bangladesh from June 11-15, 2018. The fieldwork was conducted from June 18-28, 2018 while the majority of the data analysis and writing of the report occurred from July 2-20, 2018.

Data Collection. As noted previously, USDOL and SC developed a list of evaluation questions that served as the basis for the evaluation. The questions were used to develop guides and protocols for the key informant interviews, focus group discussions, and document reviews. The master key informant interview guide is listed in Annex B. The following methods were employed to gather primary and secondary data.

Document Reviews: The evaluator read numerous project documents and other reference publications. These documents included the technical proposal, performance monitoring plan (PMP), technical progress reports, and other supporting project materials. Annex C shows a complete list of documents that were reviewed.

Key Informant Interviews: The evaluator conducted 11 key informant interviews (individual and group) with USDOL and SC headquarters staff, project staff, union partners, and government officials. The USDOL and SC headquarters interviews were conducted by telephone. The interviews with project staff, union partners, and government officials were conducted in the two target cities of Dhaka and Chittagong.

Focus Group Discussions: The evaluator also conducted three focus group discussions and with union organizers and leaders. The size of the focus group discussions generally ranged from 10 to 20 persons. The focus group discussions were conducted in Bangla and translated to English by a professional interpreter.

In total, 83 stakeholders were interviewed including 39 women and 44 men. Table 1 provides a summary of the stakeholder groups interviewed, sample size and their characteristics. A complete list of individuals interviewed appears in Annex D.

Table 1: Stakeholders, Sample Size and Sample Characteristics

Population	Method	Sample Size		Sample Characteristics
		Male	Female	
USDOL	Individual interview	1	0	ILAB-OTLA grant officer representative
Solidarity Center	Individual interviews	3	3	Country program director, SC F&BS project director, Asia program officer, legal counsel, and Bangladesh general program officers
Government officials	Individual interviews	2	0	DIFE Deputy Inspector General and FSCD warehouse inspector
Employer association	Individual interview	1	0	BGMEA Deputy Direct Fire Safety
Trade union federation officials	Individual interviews	2	1	Federation officers BIGUF, SGSF
Trade union organizers	Focus group discussions	9	5	Federation organizers BIGUF, BGIWF, SGSF, AGWF
Trade union leaders and members	Focus group discussions	19	26	Factory level trade union leaders and members BIGUF, BGIWF, SGSF
RMG factories	Group interview	6	3	Factory managers Sirina Garment and Textile, Natural Denim, and East West Industrial Park

Population	Method	Sample Size		Sample Characteristics
		Male	Female	
F&BS initiative	Individual Interview	1	1	Accord executive director, Better Work Bangladesh economic advisor (former SC F&BS project director)
Total Interviewed		44	39	

Data Analysis. The evaluator used both quantitative and qualitative methods to analyze data. Quantitative data were obtained from the PMP and incorporated into the analysis. The document reviews, key informant interviews, and focus group discussions generated a substantial volume of raw qualitative data. The evaluator used qualitative data analysis methods, including matrix analysis, to categorize, triangulate, synthesize, and summarize the raw data captured from the interview notes. The results of the data analysis provided tangible blocks of information, which the evaluator used to write the evaluation report. The data analysis was driven by the evaluation questions in the TOR.

Limitations. The scope of the evaluation specifies two weeks of fieldwork, which was not enough time to interview the range of stakeholders that are participating in the project. The evaluator believes the sample described in Table 1 accurately represents the views and experiences those stakeholders participating in the project.

Responder bias that might have been introduced since the project is very popular and well received by all stakeholders that were interviewed. Based on focus group discussions and key informant interviews, stakeholders told the evaluator that they do not want the project to end. Thus, interviewees could have been reluctant to criticize the project (responses to questions) if they thought criticism might harm any chance of extending the project.

This was not a formal impact assessment. It should also be noted that the evaluation methodology used non-random, purposive samples, which means that the findings cannot be generalized to the total population of targeted beneficiaries. The evaluation findings were based on information collected from background documents, key informant interviews, and focus group discussions. The accuracy of the evaluation findings is predicated on the integrity of information provided to the evaluator from these sources and the ability of the evaluator to triangulate, synthesize, and report this information.

III. FINDINGS

The following findings are based on fieldwork interviews with project staff, government officials, union federation officials, and trade union organizers and leaders, as well as reviews of project documents, reports, and other publications. The findings address the questions in the TOR and are organized according to the following evaluation areas: relevance, project design and validity, project performance, effectiveness of strategies, efficiency, effectiveness of project management, sustainability, and lessons and good practices.

3.1. Relevance

Relevance refers to the extent to which the project is suited to the priorities and policies of the beneficiaries as well as the host government.² This section attempts to assess relevance by answering the question of whether the project is still relevant to the priorities and needs of the Government of Bangladesh and other key stakeholders considering the evolving needs, priorities, programs and levels of commitment since the project was originally funded (Evaluation Question #1).

3.1.1. Government of Bangladesh Commitment and Capacity

Nearly everyone that was interviewed believes that fire and building safety in the RMG sector remains an important priority for the government. Although some momentum has been lost since the Rana Plaza building collapse in 2013, key stakeholders believe fire and building safety remains a priority due to the pressure placed on the government by international buyers, governments, non-government organizations (NGOs), and the trade unions. A BGMEA representative told the evaluator that fire and building safety has significantly improved over the past five years due to the government's commitment and support from international fire and building safety initiatives. On the other hand, the trade union federations' representatives believe that fire and building safety is a higher priority for them than for the government.

According to several trade union federations, while the government is committed to ensuring fire and building safety, it lacks the capacity and, in some cases, the motivation to ensure fire and building safety. In some cases, the government does not monitor fire and building safety law and regulations to ensure compliance. In other cases, according to some trade union officials, the government is susceptible to pressure from factory owners to *streamline* the inspection and factory registration process because some owners do not want to pay for modifications to buildings that would bring them into compliance.³ The union officials noted that factory owners are powerful since nearly 30 percent of elected

² <http://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm>

³ In this context, trade union officials referred to streamlining the inspection and registration process as either conducting an abbreviated inspection or skipping the inspection so non-compliance with fire and building standards are not identified.

parliamentary members are businessmen, many of whom own RMG factories. According to trade union representatives, these members of parliament support legislation that favors factory owners.

3.1.2. The Future of Accord and Alliance

After the Rana Plaza building collapse in 2013 that killed 1,134 persons and injured more than 2,000, two important international fire and building safety initiatives were established. These include *The Accord on Fire and Building Safety in Bangladesh* (Accord) and *The Alliance for Bangladesh Worker Safety* (Alliance). The Accord and Alliance, along with the ILO's RMG Program, were critical in assisting the government to address fire and building safety risk in RMG factories.

The Accord

The Accord is a five-year independent, legally binding agreement between approximately 200 mostly European brands and trade unions designed to ensure a safe and healthy RMG sector in Bangladesh. The Accord is based on an independent inspection program supported by brands in which workers and trade unions are involved, public disclosure of all factories based on inspection reports and corrective action plans, a commitment by signatory brands to ensure sufficient funds are available for remediation and to maintain sourcing relationships, democratically elected health and safety committees in all factories, worker empowerment through an extensive training, complaints mechanism, and right to refuse unsafe work. Of the 1,620 garment factories covered by the Accord, 85 percent have complied with its safety standards.⁴

The original Accord agreement was signed in May 2013 and ended in May 2018. A new agreement was signed in June 2018 and is expected to end in June 2021. The 2018 Accord is committed to handing over the work of the Accord to a credible and demonstrably functioning national regulatory body. The *Transition Accord* will operate until the national regulatory body meets a set of rigorous conditions that include demonstrated proficiency in inspection capacity, remediation of hazards, enforcement of the law against non-compliant factories, full transparency of governance and remediation progress, and investigation and resolution of workers' safety complaints.⁵

However, the future of the Accord is uncertain. A local RMG factory filed a writ petition against the Accord after it terminated its business relationship with the factory for non-compliance with its safety and health standards. Based on the writ petition, two supreme court justices have filed an injunction that would require the Accord to cease operations and leave the country.⁶ According to its executive director, the Accord continues to play a

⁴ <http://bangladeshaccord.org/news/>

⁵ <http://www.industrial-union.org/more-than-100-brands-sign-2018-transition-accord-in-bangladesh>

⁶ <https://www.thedailystar.net/business/accords-extension-now-more-difficult-1560520>

critical role in ensuring fire and building safety and will continue to operate until the government requires it to cease operations.

Representatives from BGMEA and the Department of Inspection for Factories and Establishments (DIFE) told the evaluator that while Accord served an important function in helping identify and remedy fire and building safety issues, it is time to close operations and leave the country. The BGMEA representative noted that Bangladesh is more than capable of working with factories to ensure fire and building standards are met. Trade union federation officials, on the other hand, believe that Accord will be needed for several more years because the government does not have the capacity or resources to inspect and enforce remediation actions required so factories comply with international fire and building safety standards.

The Alliance

The Alliance, which was established through the US Bipartisan Policy Center, is a legally binding, five-year commitment to improve safety in the Bangladeshi RMG sector. After the Rana Plaza building collapse in 2013, a group of 29 global retailers, mostly from North America, formed the Alliance. Of the 675 factories covered by the Alliance, 90 percent have met its fire and building safety standards.⁷

The Alliance, which is scheduled to end towards the end of 2018, intends to establish a successor safety monitoring organization (SMO) that would carry forward the Alliance's inspections, safety monitoring, training and helpline services once the Alliance's 5-year term draws to a close at the end of 2018. The SMO would collaborate closely with the government and BGMEA to ensure independent inspections, public disclosure, and effective remediation of fire and building safety risk.

Although the Alliance and Accord are committed to improving fire and building safety by leveraging the influence of key global buyers, the trade union federations, in general, believe that the Accord compliance standards are more stringent and that it is more effective at involving the trade unions and workers in the inspection process, remediation efforts, and monitoring. Trade union leaders and organizers that were interviewed agreed that the Accord complaint mechanism is more effective than those of the Alliance and DIFE. Some trade union federation officials are concerned that the SMO proposed by the Alliance will be ineffective because it will be heavily influenced by BGMEA and factory owners.

3.1.3. The ILO RMG Strategy and the Remediation Consulting Cell

After the Rana Plaza building collapse, the ILO supported the government with the National Tripartite Plan of Action on Fire and Building Integrity (NAP). The first phase of the program (October 2013 - June 2017) focused on building and fire safety assessments of 1,500 factories not covered by the Accord or Alliance initiatives, labor inspection

⁷ <http://www.bangladeshworkersafety.org>

reforms, awareness on occupational safety and health (OSH) issues, rehabilitation and skills training for Rana Plaza survivors, and the launch of the Better Work Bangladesh (BWB) program. In 2017, the ILO initiated the second phase of the RMG strategy that focuses on factory safety through remediation, governance building to effectively regulate industrial safety and support labor inspection reform, improving OSH, and expansion of the BWB program.

An important element of the ILO's RMG program is the remediation coordination cell (RCC) that will manage the remediation process for garment factories under the NAP. The RCC is staffed and supported by seconded members of regulatory bodies including DIFE, Fire Service and Civil Defense (FSCD), RAJUK, Chief Electrical Inspector, Public Works Department (PWD), and the Chittagong Development Authority (CDA). At the time of the evaluation, the RCC, with the financial support of the ILO, was in the process of awarding a contract to a Bangladeshi engineering firm to hire 60 private sector engineers to provide technical expertise for remediation follow up. The RCC will eventually evolve into the government's official national regulatory body that was noted above under the discussion of the Accord.

The general consensus of the Accord and trade union representatives who were interviewed is that the RCC, even with private sector engineers to conduct inspections and follow up on remediation plans, will lack capacity and resources to effectively regulate RMG factories. These stakeholders also believe the transition of RCC into a capable national regulatory body will take many years to achieve. DIFE's Deputy Inspector General for Safety also acknowledged that the agency lacks capacity. He explained that DIFE, which has 80 inspectors to cover approximately 745 RMG factories, does not yet have an effective complaint mechanism and has only been able to train safety committees in 100 of the 745 factories covered by NAP.⁸ He told the evaluator that DIFE will continue to require support from NGOs like SC to help establish and train the safety committees.

In summary, it appears that while fire and building safety is still a priority for the government, it lacks the capacity and resources to effectively regulate the RMG sector. To address the government's lack of capacity, the ILO has helped establish and fund the RCC, which provides inspection and remediation services.⁹ While the RCC is expected to transition into a national regulatory body, it appears that the transition will take many years making initiatives like the Accord, Alliance, and other NGO programs indispensable.

3.2. Validity of Project's Design

This section attempts to determine whether the project's design, including the theory of change, is logical and realistic with clearly defined outcomes and outputs and whether

⁸ Note that initially approximately 1,500 RMG factories were covered by NAP. According the Deputy Inspector General, the number decreased to 745 because factories that were unable or unwilling to meet fire and building safety standards closed while other factories joined Accord and Alliance.

⁹ Note that financial support to the ILO RMG Programme, including support to the RCC, is provided by the governments of Canada, Netherlands, and United Kingdom.

the critical assumptions were realistic (Evaluation Question #2). This section also examines whether the project's theory of change was validated through implementation (Evaluation Question #3).¹⁰

3.2.1. Project Design Logic

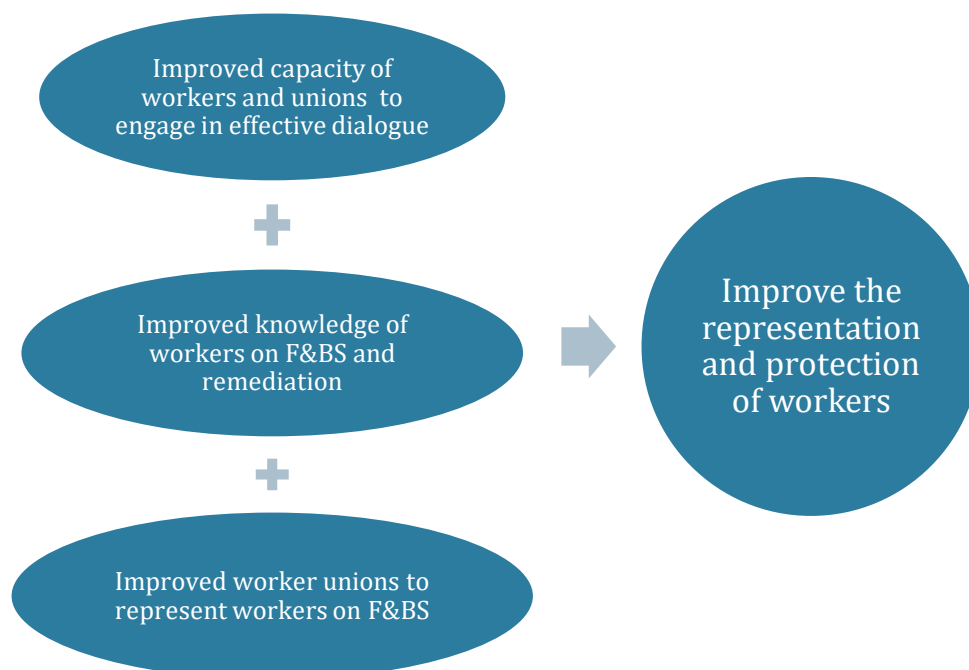
The project's design and theory of change is built on a sequential flow of internal causal logic around the project's outcomes and development objective. For example, if the outcomes are achieved, the project's development objective will be achieved.

Figure 1 shows the SC F&BS project's theory of change. The development objective is "*improved representation and protection of workers in the RMG sector related to fire and general building safety*". To achieve this objective, the theory of change includes the following three outcomes:

1. Improved capacity of workers and worker organizations to engage in effective dialogue with the GOB and employers on fire and general building safety strategic plans, including NAP and related initiatives;
2. Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate GOB authorities and/or factory managers; and
3. Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.

¹⁰ Note that the theory of change is the expression of the project design's cause and effect logic. The theory of changes is also referred to as the results framework.

Figure 1: Project's Theory of Change



In the opinion of the evaluator, the development objective does not clearly describe the impact the project's strategy aims to achieve. The SC F&BS project's training and other capacity building activities are intended to translate into decreased risk and fewer fire-related accidents, deaths, and injuries in the workplace. The theory of change would be better served if the development objective had been stated in these terms.

On the other hand, the three outcomes mirror the three focus points under the second objective of USDOL's SCA 13-08, *Improving Fire and General Building Safety in Bangladesh*. These outcomes are clearly written, reflect improvements in knowledge and practices, follow a tight cause and effect causal logic, and contribute to improved fire and building safety in RMG factories.

The SC F&BS project's theory of change makes four important assumptions. Table 2 shows these assumptions along with a discussion.

Table 2: Theory of Change Assumptions and Discussion

Assumptions	Discussion
Workers, employers and GOB ministries are willing to work with SC and cooperate with each other.	Workers and government ministries were willing to collaborate with the project. On the other hand, the project experienced difficulty convincing some factories under NAP to participate in the joint workplace F&BS trainings.
Retired building inspectors are willing to consult for the project and are not hindered by the GOB or employers from participating.	The project was able to contract qualified retired building inspectors and other consultants to serve as trainers without hindrance from the government and employers.

Assumptions	Discussion
Fire and building safety initiatives successfully start up and continue to be active, and parties to these initiatives are willing to include partner worker organizations in activities.	The Accord, Alliance, and the ILO F&BS program successfully started and contributed to improving F&BS in corresponding factories. The Accord, and to a lesser extent, the Alliance have been willing to include unions in their inspection, remediation, and training activities.
Bangladesh continues to experience relative political stability, including the periods preceding and following the upcoming national elections.	In December 2016, a wage strike in Ashulia snowballed into widespread labor unrest and violence. Due to the crackdown by the police and government, trade unions closed most of their offices and suspended activities, which caused delays.

3.2.2. Theory of Change and Validation

The evaluator was not able to determine whether the theory of change was validated through project implementation. As noted previously, the validation of the theory of changes is predicated upon the achievement of the three outcomes. The SC F&BS project's PMP does not include the appropriate impact or effect level indicators to measure the achievement of outcomes, such as the percent of fire and building safety hazards remedied or percent decrease in fires (major or minor). The PMP is discussed in more detail in Section 3.3.

Nevertheless, based on anecdotal information ascertained during interviews with union organizers, union leaders, and factory managers, the evaluator believes that union leaders and, to a certain extent, general workers improved their knowledge of fire and building safety risk and the actions that they or management should take to address the risk. A FSCD representative told the evaluator that the number of fires in RMG factories has significantly decreased since 2013. On the other hand, the Accord's executive director commented that, according to Accord data, the number of fires have not decreased but deaths, injuries, and property loss significantly decreased. He credits this achievement to factories adhering to fire and building safety standards such as installing fire doors, increasing the number of fire escapes, and improving general fire and building education and awareness.

Union leaders have been able to convince management, in some factories, to take the appropriate actions to address these risks, making the factory safer for workers. In these factories, the evaluator believes the theory of change was validated. However, in some of the factories covered by NAP, union leaders faced difficulties convincing management to address fire and building risk. In these factories, the evaluator believes the theory of change was not completely validated.¹¹ This would suggest that factory commitment to address fire and building risk should have been included the project's results framework as one of the outcomes.

¹¹ Note that these observations are the opinion of the evaluator based on interviews. However, there is not substantial empirical evidence to support the validation of the theory of change.

3.3. Project Performance and Performance Indicators

While the TOR does not include a specific evaluation question on project performance and progress against the indicator targets, one of the overall objectives of the evaluation is to review the achievements and performance of the SC F&BS project including the extent to which the objectives, outcomes and targets have been achieved. This section examines the progress the project has made in achieving its end of project indicator targets for the three outcomes as well as the appropriateness and usefulness of the performance indicators in terms of the project's ability to assess progress at outcome and output levels (Evaluation Question #4). This section also addresses Evaluation Question #14, which is discussed under Indicator 3.5.

3.3.1. Project Performance

Outcome 1: Improved capacity of workers and worker organizations to engage in effective dialogue with the GOB and employers on fire and general building safety strategic plans, including NAP and related initiatives.

Table 3 shows Outcome 1 indicators, indicator targets, achievements, and an analysis. Overall, the SC F&BS project is on track to achieve or overachieve the indicator targets for Outcome 1.

Table 3: Outcome 1 Indicators, Targets, Achievement, and Analysis

Indicators	Target	Actual	Analysis
1.1. Number curricula developed	1	1	The project planned to develop one F&BS curriculum. The F&BS curriculum was developed in the initial phases of the project and used to train union organizers and leaders.
1.2. Number curricula materials printed	300	1,500	The curriculum materials is a booklet on F&BS. The project planned to print 300 copies for the targeted number of trainees (280). However, trade union federations and some factories requested more copies, which is why 1,500 copies were printed and distributed.
1.3. Number union federations utilizing curriculum to educate workers	5	7	The project initially planned to work with five federations to train union organizers and leaders. This number was later increased to seven federations. These include Bangladesh Garment and Industrial Workers Federation (BGIWF), Somnilito Garments Sromik Federation (SGSF), Garments Workers Solidarity Federation (GWSF), Akota Garment Workers Federation (AGWF), Bangladesh Independent Garment Workers Union Federation (BIGUF), Bangladesh Revolutionary Garments Workers Federation (BRGWF), and United Federations of Garment Workers (UFGW).
1.4. Number worker resource people trained	280	389	The project initially planned to train 280 union organizers and leaders. The target was set based on the target number training courses (14) multiplied by the average number of trainees (20) per course. However, union federations sent an additional 89 participants while the factories sent 20

Indicators	Target	Actual	Analysis
			managers. This increased the number of trained resource people to 389, which include 187 females and 202 males.
1.5. Number certification trainings	14	14	The project planned to conduct 14 F&BS certification courses, which is the number that have been conducted.
1.6. Number workers/worker organization staff successfully completing certification	280	369	As noted previously, the project planned to train and graduate 280 union organizers and leaders. The actual number trained who received certificates is 369; 89 more than planned. However, 20 persons did not complete the training and receive certificates. Of the 369 trained, 181 were females and 188 were males.
1.7. Number mentorship meetings conducted	200	203	The mentorship meetings occur when SC staff meet with union leaders and mentor them on F&BS issues and how to address hazards they identify. The project set a target of 200 meetings and, to date, reported conducting 203 meetings.
1.8. Number of fire and building safety initiative events attended	20	39	F&BS events include special events such as trainings and meetings organized and conducted by the Accord, Alliance, and ILO. While the project planned to send its F&BS certificate graduates to 20 events, it has managed to send graduates to 39 events.
1.9. Number master trainers integrated into trade union federations	24	22	As part of the project modification that increased the budget and extended the end date, the project committed to training 24 of its F&BS certification graduates to be master trainers who would be available to continue training or communicating F&BS messages to union leaders and workers. To date, the project reported that it trained 22 master trainers (12 females and 10 males) who represent 12 factories.
1.10. Number federations adopting the new data management system	2	0	Also, as part of the project modification, the project committed to developing a data management system to help trade union federations monitor F&BS training in the unionized factories. During the evaluation, the data management system was in the final stages of development and had not yet been adopted by the federations. The project targeted two federations, which seems low considering it is working with seven federations (see Indicator 1.3).

Outcome 2: Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate GOB authorities and/or factory managers.

Table 4 shows the indicators, indicator targets, achievements, and an analysis for Outcome 2. The SC F&BS project is on track to achieve or overachieve all of the indicator targets except Indicators 2.1 and 2.7. While the project intended to engage factory management in 70 factories on fire and building safety issues, it reported that management was engaged in 38 factories where it conducted training events (Indicator 2.1). The project also planned that union leaders would submit 50 reports to factory management but only seven have

been submitted and accepted. The reasons the indicator target is not being achieved is discussed under the analysis of Indicator 2.7.

Table 4: Outcome 2 Indicators, Targets, Achievement, and Analysis

Indicators	Target	Actual	Analysis
2.1. Number factories where local unions engage with management	70	38	This indicator measures the number of factories where trade union leaders engage in dialogue with factory management about F&BS hazards. The project set a target of 70 factories and reported that trade union leaders engage in dialogue with factory management in 38 factories where it conducted training.
2.2. Number trainings conducted in the unionized workplace	30	30	The project planned to conduct 30 training sessions in unionized factories. To date, the project has conducted 30 training sessions in 12 of its 102 targeted factories. According to project managers, many of the targeted factories do not permit trainings because it can interfere with production. This is discussed in more detail as a challenge in Section 3.4.
2.3. Number participants trained	1,500	1,697	The project set a target of 1,500 workers to be trained in unionized factories. The target was set by multiplying the number of trainings (30) by an average number of participants (50). To date, the project reported that it trained 1,697 workers in 12 factories or 197 more than planned. This includes 810 females and 887 males.
2.4. Number F&BS training materials produced	5,000	5,000	The F&BS materials include brochures and pamphlets with F&BS information intended to be distributed to workers during joint workplace trainings. It is not clear how the target of 5,000 was set. However, the project reported that it printed and distributed 5,000 of these F&BS materials to workers during and after the joint workplace trainings.
2.5. Percent training participants with improved knowledge of FB&S reporting	80%	85%	The project set a target of 80 percent of training participants with improved F&BS knowledge. SC staff conduct an informal post training survey asking questions about the training content. Apparently, SC staff conduct a quick calculation to determine the percent of participants that show improved knowledge. The project reported 85 percent improvement in knowledge of FB&S reporting (45 percent female and 55 percent male). Since this is not a formal pre-posttest, the evaluator could not verify the actual achievement.
2.6. Number factory union leaders and fire safety committees trained on reporting hazards to factory managers and GOB	60	55	While the project set a target of training 60 safety committees, it has actually trained 55 at the time of the evaluation. Nearly 55 percent of the participants were female while 45 percent were males. These include safety committees in 49 unionized factories and six non-unionized factories. The project has had difficulty convincing factory managers to allow the project to conduct training in non-unionized factories. Furthermore, the establishment of safety committees has been delayed because the Labor Rules that provide guidance on establishing the safety committees was not developed and implemented until September 2015.

Indicators	Target	Actual	Analysis
2.7. Number reports submitted to factory managers and/or GOB	50	7	As noted above, the reports document F&BS hazards identified by union leaders that should be formally submitted and accepted by factory managers. However, according to both SC managers and union leaders, many factory managers are unwilling to formally accept a written document. This would help explain why only seven reports have been submitted and accepted by factory managers.

Outcome 3: Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.

Table 5 shows the indicators, indicator targets, achievements, and an analysis for Outcome 3. The SC F&BS project is on track to achieve or overachieve the indicator targets for Outcome 3. The only exception is Indicator 3.7, which is the number of workers represented on legal cases. The project set a target of 15 cases and has achieved 10.

Table 5: Outcome 3 Indicators, Targets, Achievement, and Analysis

Indicators	Target	Actual	Analysis
3.1. Number trainings conducted in unorganized or newly organized workplaces	40	53	Outcome 3 is the expansion of F&BS training to newly unionized factories. The project set a target of 40 trainings and achieved 53. Typically, the training was conducted by a SC staff and a trade union leader or organizer. However, the 53 trainings were conducted in only three newly unionized factories. According to project staff, the low number of factories can be attributed to factory management resistance to having trade union organizers and leaders conduct F&BS training because it could lead to the unionization of the factory, which is opposed by many factory owners and managers.
3.2. Number participants trained in unorganized or newly organized workplaces	2,000	3,061	The target of 2,000 workers in newly unionized factories was set by multiplying 40 training sessions by an average of 50 training participants. The project achieved 3,061 that represents 53 training sessions (Indicator 3.1) multiplied by an average of 58 participants in each session.
3.3. Number additional training materials printed	1,000	5,000	It is not clear how the indicator target of 1,000 was set. Nevertheless, the project reported that it printed and distributed 5,000 F&BS brochures and pamphlets to workers during the expanded outreach activities.
3.4. Percent training participants with improved knowledge of F&BS reporting	80%	80%	As explained under Indicator 2.5, the project conducts an informal post training check with participants to assess knowledge. It set a target of 80 percent, which is the reported rate of achievement. However, this cannot be verified because formal pre-posttest data are not available.
3.5. Number certified worker leaders engaged in	280	369	The project set a target of 280 union leaders to be engaged in worker representation and reported that 369 were engaged. The target number of 280 is based on the target number of trade union organizers and leaders trained in the F&BS certification courses. The achievement of 369 is based on the actual number

Indicators	Target	Actual	Analysis
workers representation activities ¹²			trained (Indicator 1.6) who received a certificate. However, the achievement of 369 assumes that all trade union organizers and leaders who were trained are actively engaged in worker representation. The evaluator could not verify this achievement.
3.6. Number agreements with enhanced fire and building safety language	10	25	The agreements are collective bargaining agreements (CBA) where F&BS language was built into the CBA. The project set of target of 10 CBAs and, to date, reported 25 CBAs where F&BS language is included in the agreement.
3.7. Number individual workers represented through legal cases	15	10	This indicator is based on the premise that trade union leaders who raise concerns about F&BS run the risk of being fired. ¹³ If they are fired, the SC provides legal support and representation if the fired worker requests such support. The project set a target of 15 workers and reported that 10 workers have actually requested and received legal representation.
3.8. Number instances management or GOB addressed worker reports on workplace hazards	45	128	This indicator attempts to measure the number of F&BS issues identified and reported to management that were remedied. It is not clear how the target of 45 was set, which seems quite low. Nevertheless, the project reported that 128 F&BS issues were resolved by management.
3.9. Percent addressed worker reports resulting in remediation of hazard	40%	70%	This indicator is related to Indicator 3.8. The project set a target of 40 percent of F&BS issues/hazards reported to management would be resolved. To date, the project reported that 70 percent or 128 out of 182 cases reported were resolved.
3.10. Number functioning fire safety committees	0	90	The project did not set an indicator target for the number of functioning fire and building safety committees. It reported that 90 have been established and are functioning. The majority of the fire and safety committees that are functioning were established in factories covered by the Accord. Apparently, the Accord assists its factories to establish the safety committees while the Alliance and DIFE do not. According to the DIFE, only 100 of the 745 factories covered by the NAP have been trained and are considered functional.

3.3.2. Project Indicator Analysis

The SC F&BS project has 14 output indicators and 13 effect level indicators that attempt to measure changes in knowledge, behavior, or practices. The indicators are organized under each outcome and generally satisfy the indicator definitions in the 2013 ILAB

¹² Evaluation Question #14 asks whether the *analysis of the project's monitoring data indicate that workers' organizations' are more effectively representing workers on fire and general building safety matters to ensure that their rights and interests are effectively protected?* Indicator 3.5 attempts to measure worker representation. Based on the analysis, trained trade union leaders are active in representing workers on workplace safety issues. However, it is not clear whether all 369 trained union leaders are actively representing workers.

¹³ Bangladesh labor law does not provide explicit protection for worker representatives engaged in safety committee work, so employers can potentially act against workers who speak out.

Management Procedures and Guidelines (MPG). The output indicators measure number of people trained, number of training events, and number of education materials developed. The effect indicators attempt to measure new knowledge about fire and building safety and changes in behaviors and practices such as identifying and reporting fire and building hazards to factory management and the resolution of these hazards.

While output indicators are an important management tool, they do not indicate whether the outcomes were achieved. While the effect level indicators attempt to measure the achievement of the outcomes, some are not well defined while others are difficult to verify. Many of the effect level indicators would have benefited from having an operational definition. For example, Indicator 1.9 is the *number of master trainers integrated into the trade union federations*. It is not clear what *integrated* means and how it should be counted. One of the most important indicators is Indicator 3.9, *percent addressed worker reports resulting in remediation of hazard*. The evaluator understands that the data source for this indicator is self-reporting by trade union leaders of the hazards reported and resolved by management. While SC F&BS staff consult with factory management to corroborate the remediations reported by trade union leaders, the project does not have a mechanism in place to “physically” verify the remediations. According to the project, many factories do not allow access to factories making physical verification difficult.

In general, the evaluator believes the project would have benefited from a more rigorous M&E system. In addition to a set of well-defined indicators linked to outcome achievement, the SC F&BS project should have conducted a baseline survey measuring a core set of fire and building safety indicators in factories and an endline survey measuring changes in those indicator values. The indicators might have included key fire and building safety hazards as well as fires and other incidents. While a large random sample survey would not have been appropriate given the difficulty accessing many factories, the project might have employed a cohort or purposeful design using a mix of quantitative and qualitative data collection methods. A rigorous M&E system is discussed in more detail as a recommendation in Section 5.

3.4. Effectiveness of Project Strategies

This section examines the effectiveness of the SC F&BS project’s strategies and challenges the project has faced while implementing them. In particular, this section examines the acquisition and use of new knowledge to address fire and building hazards (Evaluation Question #5 and #13). This section also examines the extent to which training activities helped improve engagement and dialogue between workers and their organizations, employers, and government officials (Evaluation Question #6, 7, and #12).¹⁴

¹⁴ Note that in the TOR, evaluation question #12 and #13 are organized under *Impact*. Given the similarity of these questions with those in this section, the evaluator decided to address them together.

3.4.1. Fire and Building Safety Knowledge

Trade union federation officials, organizers, and leaders were unanimous in their responses that the training resulted in an increase in knowledge on fire safety and general building hazards and practices including inspections and how to report hazards to factory management and DIFE. This perception is consistent with the achievement of Indicator 2.5 that shows that 85 percent of workers improved knowledge on fire and building safety after training.¹⁵

When asked how trade union leaders used knowledge, skills, and improved understanding of fire and building safety in their workplaces, they noted several important ways the knowledge was applied. First, trade union leaders told the evaluator that they typically use lunch breaks to talk to fellow workers about fire and building safety hazards such as blocked exits, locked fire escape doors, non-functioning fire extinguishers, and electrical hazards. Union organizers and leaders also collaborated with SC to conduct joint workplace training on fire and building safety for workers. Several union leaders reported that they conducted training without the support from union organizers and SC staff.

In addition to communicating fire and building safety messages to co-workers during lunch breaks and conducting joint workplace training, trade union leaders also identify safety hazards in factories and report them to factory management. If factory management does not adequately address the complaint, union leaders contact their federation and SC who help them determine how to respond. If the factory is covered by the Accord or Alliance, the federation and union leaders can use their complaint mechanisms to formally file a complaint about fire and building safety. If the factory is covered by NAP, the union representatives file the complaint with DIFE.

According to the union leaders, organizers, and federation officials, those factories under the Accord are most responsive in receiving the complaint and seeking remediation. This can be explained by the fact that the Accord has a well-defined complaint mechanism in place that workers can use if they believe that factory management is not adequately addressing their concerns. One union leader told the evaluator that she reported a large crack in the wall to management. When she realized that management did not intend to address the crack, she filed a complaint with the Accord, which investigated the crack and requested the factory to change buildings. On the other hand, factories covered by the NAP tend to be less responsive. One federation official explained that many of the factories covered by the NAP do not think that trade union leaders have the capacity nor mandate to identify and report fire and building safety hazards.

The evaluator asked trade union organizers and leaders how the training might be improved to make it even more effective. Following is a summary of their recommendations.

¹⁵ As explained under the discussion of Indicator 2.5, the evaluator could not verify the reported improvement in knowledge since formal pre and posttests were not used.

- **Broaden fire and building safety training to include OSH issues.** The SC F&BS project actually started to include OSH topics in the fire and building safety training during the project extension period since the safety committees are responsible for a range of OSH issues in addition to fire and building safety. The evaluator considers including OSH issues in the fire and building safety training as a good practice, which is discussed in more detail in Section 3.8.
- **Conduct training in factories with management.** One of the most common recommendations made by trade union representatives to increase the effectiveness of training is to conduct them in factories instead of in the federation offices. In addition, the training should include factory managers so they understand risks and are supportive in working with union leaders on remediation.¹⁶
- **Provide refresher training.** Another common recommendation to increase training effectiveness is to provide follow up and refresher training for trade union leaders. Federation officials and union organizers explained that some union leaders and general workers who participated in joint workplace training tend to forget what they learned. They suggest conducting regular follow up training to reinforce new knowledge regarding fire and building safety.
- **Use video clips, tools, and dynamic, participatory approaches.** Training participants also opined that one way to increase the effectiveness of training would be to use relevant video clips about fire and building safety risks such as what happens if fire escapes are blocked. In addition, training should include more hands-on practical and participatory approaches to engage training participants in addition to the theory.¹⁷
- **Include how to file hazard reports to the DIFE.** Several trade union representatives suggested that training effectiveness could be increased by providing specific training on how to prepare and file fire and building hazard reports to the DIFE. The project director, on the other hand, told the evaluator that the training already includes sessions on how to report hazards to DIFE. The evaluator suggests that the project review its training to ensure it is meeting the needs of the training participants and trade union federations regarding reporting to the DIFE.

3.4.2. Dialogue with Employers and Government

Those who participated in the fire and building safety certification course clearly believe that the training helped improve their ability to engage factory managers in a dialogue regarding workplace safety issues and seeking remediation with the DIFE, Accord, or Alliance. During focus group discussions, union organizers and leaders told the evaluator

¹⁶ It should be noted that including factory managers in the joint workplace training has been a challenge for the project for a variety of reasons, which are discussed below in Section 3.4.3.

¹⁷ The project reported that it used video clips in the certification course to promote better understanding of safety and technical matters; four case study sessions on workplace safety; and a practical fire extinguishing session for participants using different types of portable fire extinguishers.

that the training helped establish union leaders as fire and building safety experts that gained them the respect of factory managers and fellow workers, which, in turn increased their confidence to engage in dialogue.

Below is a representative sample of responses from union leaders regarding how the training helped them engage management in workplace safety issues.

- *I gained respect from my fellow workers because I could identify safety risks and hazards. I think even management respects me more now.*
- *I learned how to communicate a fire hazard to management. Before the training I aggressively confronted management, now I know how to engage management in dialogue.*
- *Before the training, my first reaction if management did not respond to my complaint was to think about a strike. Now, I try to engage management in dialogue to see if we can find a solution.*
- *The training helped us engage management on safety issues. For example, we did not know about fire and building safety risks and laws before. Now we can now talk to management about the risks and laws in a technical way.*
- *My confidence has improved and now I can communicate directly with management on safety hazards. I could not have done that before the training.*
- *I shared my knowledge with other factory workers. They used to take a nap under sewing machines. I explained to them and management why it is a fire hazard. Now management does not allow workers to sleep under the machines.*
- *I learned how to use a fire extinguisher and taught fellow workers to use it. I also taught some managers to properly use the fire extinguisher.*

In addition to an increase in knowledge about identifying and reporting fire and building safety hazards and an improved ability to engage management on these hazards, trade union representatives reported other benefits from having participated in the trainings. For example, many union leaders commented during focus group discussions that due to an increase in self-confidence and respect from management and co-workers, they are taking on new leadership roles in the factory and in their communities. Several union leaders told the evaluator that the training made them more effective union leaders.

Both factory managers and trade union leaders also credit the SC F&BS project for improving the relationship between factory management and unions. One factory manager in Chittagong explained that by working together on workplace safety, management and unions have learned to trust each other that has paved the way for more productive dialogue on a range of labor issues.

3.4.3. Challenges to Addressing Fire and Building Safety Hazards

Despite the achievements, trade union leaders face a range of challenges in addressing fire and building safety hazards. One of the most common challenges is that factory managers

threaten to fire union leaders if they report safety hazards.¹⁸ In one factory covered by the Accord, nine safety committee members were fired because they confronted factory management with several fire and building safety issues. The federation helped the workers file a complaint with the Accord, which conducted an investigation that determined the workers were wrongly fired and ordered the factory to reinstate the workers. While trade union representatives opine that those factories covered by the Accord have improved and are more responsive to the safety committees, those not covered by the Accord, especially factories covered by the NAP, still threaten to fire workers. The DIFE does not yet have a well-defined complaint mechanism and still lacks the capacity and resources to conduct proper complaint investigations.

Another important challenge is convincing factory managers to allow workers to participate in fire and building safety training. Many factory owners are reluctant to allow workers to participate in training because they believe the training interferes with production targets. Apparently, those factories covered by the Accord and Alliance are more willing to allow workers to participate in training due to the leverage with buyers. Several trade union leaders told the evaluator that when they approached factory management about conducting joint workplace training, managers told them not to be concerned with safety issues because the factory employs engineers who are responsible for ensuring fire and building safety.

During focus group discussions, several union organizers flagged a unique challenge they faced in trying to involve union leaders and workers in training. After training, the organizers noticed that several union leaders became inactive. When the organizers talked to the union leaders to determine the reason, the leaders said that their families did not want them to get involved in workplace safety committees, training and other activities. These families wanted the workers to concentrate on their jobs and “making money” and not participate in fire and building safety training because they view it as a distraction. Several of the union organizers met with families and were able to convince some to allow the workers to participate in the fire and building safety training.

THE DIFE’S lack of capacity and resources is another important challenge in addressing fire and building safety hazards in factories covered by the NAP. Trade union representatives believe that the DIFE does not have an effective complaint mechanism to allow it to respond to worker complaints that factory management is unwilling to address. They expressed concern over the DIFE inspections because the DIFE inspectors do not involve union leaders in the inspection process like the Accord inspectors. The DIFE representatives also acknowledge that the lack of capacity and resources hamper its efforts to effectively conduct inspections and train safety committees. For example, the DIFE

¹⁸ As noted previously, Bangladesh labor law does not provide explicit protection for worker representatives engaged in safety committee work who report fire and building safety hazards to factory management.

Deputy Inspector General for Safety told the evaluator that DIFE has only managed to train 100 safety committees in the 745 factories covered by NAP.¹⁹

3.5. Efficiency and Use of Resources

This section addresses the efficiency of the SC F&BS project's activities in terms of financial and human resources in relation to its results and output. More specifically, the expenditure rate is compared to the remaining life of the project to determine under or over spending and whether the budget will be expended by the end of the project. Any duplication of expenditures with the ILO F&BS project is examined (Evaluation Question #8). This section also assesses the allocation of resources to achieve the three outcomes and examine factors that hindered timely delivery of outputs (Evaluation Question #9)

3.5.1. Expenditure Rate

Table 6 shows total project expenditures as of May 31, 2018. The SC F&BS project was initially conceived of as a four-year project that started on September 30, 2013 and was scheduled to end on September 29, 2017. The project requested and received a cost extension in July 2017 that extended the end date by 18 months from September 29, 2017 to March 31, 2019 and increased the budget by USD 200,000 from USD 1,000,000 to USD 1,200,000.

The SC F&BS project has effectively "spent" 56 months of its total life of 66 months or about 85 percent. As shown in Table 6, 76 percent of the project's total budget was spent as of May 31, 2018 that represents an underspending rate of nine percent. While the total amount budgeted for other direct costs is overspent by 23 percent, the rest of the line items are underspent by between 10 percent and 61 percent. The exception is the contingency line item that has not incurred any charges.²⁰ The consultant line item is underspent by 61 percent.

Table 6: Project Expenditures as of May 31, 2018²¹

Item	Amount Budgeted (USD)	Amount Expensed (USD)	Difference (USD)	Percent Spent
Personnel	395,634	298,884	96,750	76%
Fringe Benefits	199,508	135,860	63,647	68%
Travel	84,134	75,432	8,702	90%
Supplies	27,369	17,998	9,371	66%

¹⁹ It should be noted that while approximately 1,500 RMG factories were initially covered by NAP, the number has decreased to 745. According to the Deputy Inspector General for Safety, many factories closed because they could not comply with safety standards while others left NAP to joint Accord and Alliance.

²⁰ It should be noted that spending on the contingency line item was restricted by USDOL until April 16, 2018, which helps explain why charges were not incurred at the time of the evaluation.

²¹ Source: Project Status Report, May 2018.

Item	Amount Budgeted (USD)	Amount Expensed (USD)	Difference (USD)	Percent Spent
Consultants	89,067	34,522	54,545	39%
Other Direct Costs	106,512	131,231	-24,720	123%
Indirect Costs	252,665	216,636	36,029	86%
Contingency	45,111	0	45,111	0%
Total	1,200,000	910,563	289,435	76%

On average, the project spends approximately USD 16,260 per month. At its current expenditure rate, the project would need 18 more months to spend the remaining USD 289,435. Since the SC F&BS project is scheduled to end on March 31, 2019, the project will need to increase its monthly expenditures from USD 16,260 to USD 28,943. The evaluator recommends that the project develop a clear plan for how it intends to expend the remaining funds by the time the project ends on March 31, 2019. The project should not spend funds in ways that would jeopardize chances of sustaining key outputs and outcomes. This is discussed in more detail in the sustainability section as well as a recommendation in Section 5.

3.5.2. Duplication with the ILO Fire and Building Safety Project

As part of its strategy to address fire and building safety in Bangladesh, the USDOL provided grants to the ILO and SC to implement two distinct projects. The ILO implemented the *Improving Fire and Building Safety in Bangladesh's RMG Sector* project (hereafter referred to as the ILO F&BS project). The ILO F&BS project aimed to address fire and building safety-related risks in Bangladesh's RMG sector by enhancing the government's enforcement of fire and general building safety laws and regulations to ensure that they are consistent with international labor and fire standards. The SC F&BS project, on the other hand, focuses on improving the knowledge of workers and union leaders regarding fire and building safety standards and laws so they can effectively engage factory management and government to remedy fire and building safety hazards.

The evaluator was unable to identify duplicity of expenditures between the ILO and SC F&BS projects. These projects have different strategies, activities, and target groups. For example, the ILO F&BS project aimed to improve fire and building safety laws and policies while building the capacity of key sector actors such as the DIFE and FSCD. The SC F&BS project intends to build the capacity of trade union organizers and leaders as well as general workers to identify fire and building safety hazards and work with factory management, DIFE, Accord, and Alliance to remedy the hazards.

3.5.2. Allocation of Resources

Table 7 shows the allocation of resources for each outcome, which sums to USD 1,026,663. The remaining USD 173,336 is the line item for M&E. Approximately, 42 percent of the total is allocated to Outcome 1, which is reasonable since it includes the fire and building safety certification training for union organizers and leaders. Twenty-nine percent of the

total outcome budget is allocated to Outcome 2 and another 29 percent is allocated to Outcome 3.

Table 7: Allocation of Resources for Each Outcome²²

Outcome	Unit Cost (USD)	Percent Allocation
1. Improved capacity of workers and worker organizations to engage in effective dialogue with the GOB and employers on fire and general building safety strategic plans, including NAP and related initiatives.	435,989	42%
2. Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate GOB authorities and/or factory managers.	296,642	29%
3. Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.	294,032	29%
Total	1,026,663	100%

Project staff, including the former project director believe that the amounts allocated to each outcome is sufficient to achieve that outcome. The former project director told the evaluator that in the initial stages of the project, the team realized that Outcome 1 lacked adequate resources so they requested a budget realignment that moved about 15 percent of the resources budgeted for Outcome 3 to Outcome 1.

3.6. Effectiveness of Project Management

In this section, the effectiveness of project management is assessed including the extent to which management capacities and staffing arrangements supported or limited the achievement of the planned results (Evaluation Question #10). This section also examines the effectiveness of coordination and collaboration with the ILO F&BS project, the three primary fire and building safety initiatives, and other relevant organizations (Evaluation Question #11).

3.6.1. Effectiveness of Management Capacities and Staffing Arrangements

The initial staff planning included a project director who was dedicated 100 percent to the SC F&BS project. Her overall responsibility consisted of overseeing project activities including supervision of consultants and trade union outreach workers. In addition, she was responsible for cooperation with trade union partners as well as program reporting and monitoring. It should be noted that while the project director has a strong background in working with trade unions, the training and technical support were provided by a small group of consultants specializing in fire and building safety. To provide additional

²² Revised project budget April 2018

technical and management support, the project hired one of the consultants as a full-time program officer in July 2015.

In May 2018, the project director resigned and was replaced by the program officer. SC hired a new program officer with substantial experience working with trade unions and training. At the time of the evaluation, the new program officer had not yet assumed his duties. The project director reports to the country program director who is responsible for working on a daily basis with the project director to oversee and implement activities. The project director and country program director are assisted by a part-time senior program officer based in Washington, DC. The finance and administrative staff in the SC Dhaka office provide administration and financial reporting with backstopping from the SC's Finance Department and Office for Performance Reporting and Evaluation (OPRE) in Washington.

It should be noted that the project modification resulted in a realignment of the budget that included splitting the effort and cost of the project director and program officer between the SC F&BS project and the USAID-funded Worker Empowerment Program (WEP). Approximately 56 percent of the project director's salary and 67 percent of the program officer's salary are budgeted to the SC F&BS project. According to the former project director, SC decided to share the costs of the project director to save money. On the other hand, SC intended to use remaining funds from the original grant allocation to fund the other 33 percent of the program officer's salary, which according to the ILAB grant officer's representative (GOR) is not permitted. The evaluator recommends that SC and GOR discuss how to allocate funds in the budget for the 18-month extension to pay for the program officer and how to ensure the project director's level of effort is tracked and reported to both USDOL and USAID.²³

The former project director, program officer, country program officer, and the OTLA GOR agree that the project's staffing plan is highly efficient and effective in achieving the project's outcomes. The midterm evaluation of the SC F&BS project also determined that the country level management structure was highly efficient and effective since local staffing, which only accounted for about 13 percent of the budget, was able to deliver high quality and effective fire and building safety training to union organizers and leaders. The evaluation also determined that the overall management structure became less efficient when the SC headquarters personnel and indirect rate costs were added, which accounted for 49 percent of the budget.²⁴

During the interview with the former project director, the evaluator asked how the management structure might be modified to better support the achievement of the outcomes. She explained that if the SC were to design a similar project, she would recommend including three program officers responsible for the three primary technical

²³ Note that during the review of the evaluation report, the SC reported that the project director's level of effort has been adjusted to 100%.

²⁴ <https://www.dol.gov/sites/default/files/documents/ilab/Bangladesh%20Midterm.pdf>: Page 49.

areas of the project: fire prevention and safety, general building safety and structural integrity, and remediation of electrical hazards.

3.6.2. Coordination and Collaboration with Fire and Building Safety Initiatives

As discussed in Section 3.5.2, the objectives and target groups of the ILO and SC F&BS projects were significantly different, which did not easily facilitate coordination and collaboration. The ILO F&BS project conducted one training for trade union representatives that was well-received by the SC F&BS project. Perhaps the two projects could have collaborated more on fire and building safety training for trade union leaders and workers aimed at reducing risks in factories covered by the NAP. As noted in the midterm evaluation, the SC country program director opined that factory-level fire and building safety training conducted by the ILO, Accord, and Alliance could have been more effectively coordinated so factories were not overwhelmed.²⁵ The evaluator agrees with this observation.

While the project has collaborated with the three primary fire and building safety initiatives, the strongest collaboration has been with the Accord. There are several reasons that explain the strong collaboration. First, the Accord employs a tripartite approach that includes trade unions, government, and the RMG factories. The trade unions, represented by IndustriALL, are consulted on a variety of issues. Second, factories that sell products to the Accord brand signatories must comply with the Accord fire and building safety standards or they can have orders cancelled. The threat of losing orders if compliance standards are not met is a strong economic incentive. The third, and most compelling reason, is that the Accord has a well-defined complaint mechanism that includes investigation and remediation, which trade unions have leveraged when the Accord factories are unwilling to address fire and building safety hazards identified by trade union leaders.

The project has collaborated with the DIFE, FSCD, BGMEA, Accord, and Alliance by inviting them to attend the fire and building safety certification training and explain responsibilities and initiatives of each organization and how they can be used as resources by trade union leaders. The FSCD staff trained by the ILO F&BS project also served as trainers in several of the certification course sessions. Beyond their participation in the training, the DIFE, FSCD, and BGMEA have not collaborated formally with the SC F&BS project. During interviews, representatives from each organization told the evaluator that the project should have signed agreements with their organizations that would have facilitated formal collaboration that would have been mutually beneficial.

3.7. Sustainability

The sustainability section reviews the project's sustainability plan and assesses progress made in implementing the plan, including training mechanisms, and whether it should be adjusted for the remaining life of the project (Evaluation Questions #16 and #17). This

²⁵ Ibid, Page 40.

section also discusses which of the project outputs and outcomes are most sustainable and transferable to the trade union partners as well as the actions the project should take to ensure sustainability (Evaluation Question #15).

3.7.1. Project's Sustainability Plan

Overview of the Project's Sustainability Plan

Based on a recommendation in the midterm evaluation, the SC F&BS project developed a sustainability plan. The sustainability plan lists the following outputs and outcomes that the project will attempt to sustain.

Training curriculum –The SC is assisting trade union federations to adopt the existing training materials including on-going rights training for workers to raise greater awareness among union members about basic fire and building safety. The training curriculum will be available to federations to use to train union leaders and workers on fire and building safety.

Trained worker resource people – The project reinforces the training provided to graduates of the certification program by implementing joint workplace trainings. A project staff member or union organizer conducts joint workplace trainings with union leaders in factories where employers have agreed to such an arrangement. By directly training co-workers, these resource people gain confidence in their training skills, engage more deeply with basic fire and building safety topics, and are seen as key resources for both workers and factory managers that should endure once the project ends.

Collective bargaining agreements (CBAs) – The strategy is to build fire and building safety language into CBAs, which are binding legal contracts that reflect progress in dialogue between workers and factory management. The project hopes that enhanced fire and building safety language can be shared through the federations with other factories where workers have organized a union for inclusion in their CBAs.

Strengthened Engagement – The project invites fire and building safety experts to participate in its certification courses. These include the FSCD, DIFE, BGMEA, Accord, and Alliance. Linkages with these organizations are made during the certification courses and reinforced in factories when union leaders identify and report fire and building safety hazards to factory managers. Federations and union leaders are also trained on how to report non-compliance of fire and building safety hazards to the Accord and DIFE. The SC F&BS project anticipates that these efforts to build the capacity of workers to identify and report hazards will last beyond the life of the project.

Two additional outputs were added as part of the project modification. These outputs, which include training a cadre of master trainers and developing a data management system for at least two trade union federation, are explained below.

Master Trainers – During the extension period, the project has started providing refresher training to graduates of the fire and building safety certification courses. The objective of the refresher training is to identify and develop a cadre of master trainers who can provide

training and ongoing support to union staff and leaders. During refresher training, the project also provides guidance and practice using basic training techniques and tools.

Data Management System - The data management system aims to track workers trained on fire and building safety, progress on achieving collective bargaining agreements, and success rates for resolving fire and building safety hazards. It also aims to identify good practices and identify needs for additional training and technical support. This data management system, which is meant to be complementary and compatible with one developed under WEP, will be transferred to at least two trade union federations who have the capacity to operate the system. At the time of the evaluation, the data management system was in the final stages of completion and the project was preparing to transfer it to the federations. It should be noted that the data management system was developed based on a recommendation in the midterm evaluation to track reinforcement training to demonstrate results.

Progress in Implementing the Sustainability Plan

As discussed in Section 3.3.1, the project has made significant progress in achieving the indicator targets associated with the sustainability plan. The *training curriculum* exists and 1,500 copies have been made and disseminated to seven trade union federation partners, union organizers and leaders, and factories. The project has trained 389 *worker resource people* who have conducted 83 joint workplace trainings for 4,758 workers in unionized and newly unionized factories. Furthermore, the project has facilitated 25 CBAs that have fire and building safety language built into the agreements. The project has also created important linkages between the trade unions and the FSCD, DIFE, Accord, and Alliance that have the potential to last once the project ends. Finally, the project has identified and trained 24 master trainers and is in the process of developing the data management system.

3.7.2. Potential Sustainability of Project Outcomes and Outputs

This section assesses the extent to which the project outcomes and outputs are likely to be sustained once the project ends. The assessment is based on interviews with a variety of project stakeholders as well as the opinion of the evaluator. Those outcomes and outputs most likely to be sustained are discussed below in Table 8.

Table 8: Outcomes and Outputs Most Likely to be Sustained

Outcomes and Outputs	Analysis
Outcomes	
F&BS/OSH knowledge and skills (short-term)	The acquired knowledge on F&BS and OSH by union leaders will likely be sustained in the short term. However, as research shows, newly acquired knowledge and skills that are not reinforced are difficult to sustain.
F&BS remediation in Accord factories	The application of F&BS and OSH knowledge and skills to address hazards will likely be sustained in the Accord factories because the Accord has an effective complaint mechanism in place. The Accord complaint mechanism is well defined and the implications for non-compliance is well understood by factories.

Outcomes and Outputs	Analysis
Federations disseminating F&BS information to members	The trade union federations through their union organizers are likely to continue to disseminate F&BS information to union members when they visit federation offices.
Outputs	
Joint F&BS workplace training in committed factories	According to project records, there are approximately 10 RMG factories committed to continuing to train workers on F&BS once the project ends. These include the Sirina Garment Factory that the evaluator visited and confirmed its commitment.
CBAAs	The CBAAs that include F&BS language are sustainable since they are legally binding agreements. Their sustainability assumes that the factories remain in business and operate under the same legal name.
Data management system	The data management system will likely be sustained by the more capable federations in the short to medium term if it does not require server hosting, which would be a cost that most federations are unable and unwilling to support.

Table 9 summarizes those outcomes and outputs the evaluator believes are least likely to be sustained once the project ends.

Table 9: Outcomes and Outputs Least Likely to be Sustained

Outcomes and Outputs	Analysis
Outcomes	
F&BS/OSH knowledge and skills (long-term)	The acquired knowledge on F&BS and OSH by union leaders will probably not be sustained in the longer term because newly acquired knowledge and skills that are not reinforced are difficult to sustain.
F&BS remediation in the Alliance and NAP factories	The application of the F&BS and OSH knowledge and skills to address hazards will likely not be sustained in the Alliance and NAP factories because these initiatives do not have well-defined complaint mechanisms with the threat of canceling orders for non-compliance.
Outputs	
Joint F&BS workplace training not supported by committed factories	The joint F&BS workplace training in those factories that have not expressed the commitment to continue the training will likely not be sustained. The joint workplace training requires minimal resources that the project previously provided. If the factory is not willing to assume these costs, the training will not be sustained.
F&BS training conducted by the master trainers (federations)	Any training and technical support provided by master trainers will likely not be sustained. The federations do not have funds to pay for participant transportation, snacks, and training materials for training events.

3.7.3. Adjustments to the Project's Sustainability Plan

USAID's Food for Peace Office, through the Food and Nutrition Technical Assistance (FANTA) project, commissioned a post project impact study to evaluate the sustainability

of 12 USAID funded projects in four countries.²⁶ The evaluator believes that this post project impact study provides several useful lessons that could help the SC F&BS project make several adjustments to increase the chances of sustaining some of the outcomes and outputs.

The study, which was conducted by Tufts University, concluded that project achievements at the time of the endline survey did not necessarily translate into sustained benefit for project beneficiaries. In fact, focusing exclusively on achieving targets during the life of the project could jeopardize longer term sustainability. Other important findings are discussed below.

Replacement resources, capacity building, and motivation were critical to achieving sustainability. Identifying cash or in-kind resources to replace resources provided by the project; building the management and technical capacity of partners (both organizational and individual) to continue to implement activities; and maintaining high levels of partner and beneficiary motivation were not only critical but interrelated success factors.

Gradual transition from project supported activities to independent operation was important to achieve sustainability. Sustainability was more likely when projects gradually phased out activities and resources and allowed partners and beneficiaries to operate independently well before the project ended. A significantly long disengagement process allowed local partners and beneficiaries to gain operational experience and confidence.

Creating linkages, especially vertical linkages, between community and institutional structures was critical for effective phase-over and sustained support. Creating linkages between project beneficiaries and partners and corresponding public and private sector institutions to support them is one of the most important sustainability success factors.

The evaluator believes that the sustainability success factors identified by the USAID post project impact study have important implications for the SC F&BS project's efforts to sustain key outcomes in the long-term. The project might consider the following adjustments to the sustainability plan in the last eight months of the project.

- Focus capacity building efforts on those federations and factory level trade unions that are the *strongest and most organized and motivated* to continue to address OSH activities in factories through safety committees.^{27, 28} While federations and factory level unions generally lack resources, the project might assess and determine which trade unions have some degree of replacement *resources*.

²⁶ Sustaining Development: A Synthesis of Results from a Four-Country Study of Sustainability and Exit Strategies among Development Food Assistance Projects, Gerald J. and Dorothy R. Friedman School of Nutrition Science and Policy at Tufts University, October 2016 <https://www.fantaproject.org/research/exit-strategies-ffp>

²⁷ These would be active trade unions with strong and dynamic leadership.

²⁸ The factory level trade unions, with support from their federations, would help factor management establish safety committees where they do not exist.

- Begin immediately to have federations and their factory level trade unions plan and conduct OSH activities for workers without the financial assistance of the project. This would represent a *gradual transition* from project supported activities and resources that will allow trade union partners to *operate independently* before the project ends in March 2019 and, hopefully, *gain experience and confidence*.
- Ensure that the trade unions are linked to institutional fire and building safety resource organizations such as the Accord, Alliance, FSCD, and DIFE for factories covered by the NAP. The project has invited key fire and building safety resource organizations to participate in the certification courses to help create linkages. In the case of the Accord, trade unions operating in factories covered by the Accord enjoy strong linkages to its resources. In the remaining life of the project, linkages with the Alliance or its replacement SMO, FSCD, and DIFE should be strengthened, which could involve signing formal agreements between the federations and these organizations.

3.8. Best Practices and Lessons Learned

This section lists and discusses best practices and lessons learned that could benefit similar projects (Evaluation Question #18). The evaluator reviewed best practices and lessons learned sections of the TPRs and included questions in the interview guides. The following list of best practices and lessons learned discussed are based on these sources of information.

Broaden fire and building safety to include OSH. The project decided to broaden the fire and building safety training to include other OSH issues such as hygiene, handling of chemicals, and use of personal protective equipment (PPE), which is one of the responsibilities of the safety committees. Trade union organizers and leaders believe broadening fire and building safety training to include OSH has increased their effectiveness and contributed to making factories safer for workers.

Leverage OSH training to build confidence with factory management. The OSH training has helped build trust and confidence between trade unions and factory management in some factories. While more traditional labor issues that trade unions address with management such as minimum wages, benefits, work hours, and production targets can be contentious, working on less contentious issues such as health and safety concerns has helped trade union leaders and factory managers learn to work together, which, in turn, has improved relationships.

Fire and building safety training creates confidence and respect. Nearly all of the trade union leaders that were interviewed commented that the fire and building safety training provided them technical knowledge and skills that contributed to building their confidence and gaining new respect from co-workers and factory managers. As a result, many trade union leaders have taken on new leadership roles on safety committees and in their communities.

Include security guards in joint workplace training. Trade union organizers and leaders learned that including factory security guards in the joint workplace training is critical to

making the factory safer. The security guards often determine what doors to lock and how workers exit a factory in case of an emergency such as a fire. It was well documented that, in the case of the Tazreen Fashion, Smart Fashion, other similar RMG factory fires, exit doors were locked and workers were not allowed to leave because security guards thought they might steal products.²⁹ Educating security guards about factory safety including safe evacuation during fires can help reduce death and injuries.

Conduct joint workplace training with factory management. The SC F&BS project staff and union organizers and leaders firmly believe that joint workplace training with factory managers improves relationships and increases the likelihood that management will work to resolve fire and building safety hazards. In general, the project has struggled to convince factory managers to allow workers to participate in joint workplace training events. However, when management participated in the trainings, its willingness to resolve fire and building safety concerns substantially increased.

SC F&BS projects success and achievements correlate closely to the Accord. The project's achievement of indicator targets associated with joint workplace training, factory engagement with union leaders, training safety committees, and fire and building safety hazards addressed by factory management occurred primarily in factories covered by the Accord. As discussed previously, the reasons the project has had so much success in the Accord factories is because it involves unions in factory inspections, the Accord signatory brands will cancel orders with factories that do not comply with its safety standards, and the Accord's complaint mechanism is well-defined and enforced. In addition, the Accord requires its factories to establish safety committees, which is mandated by the Bangladesh Labor Act (BLA). The project has faced more challenges achieving indicator targets in the non-Accord factories, especially those covered by the NAP.

²⁹ <https://www.newyorker.com/news/news-desk/death-traps-the-bangladesh-garment-factory-disaster>

IV. CONCLUSIONS

Following are the evaluator's conclusions based on the findings. The conclusions specifically answer the evaluation questions and are organized according to relevance, validity of project design, project performance, effectiveness of strategies, efficiency, effectiveness of project management, sustainability, and lessons and good practices.

4.1. Relevance

To what extent is the project still relevant to the priorities and needs of the Government of Bangladesh and other key stakeholders considering the evolving needs, priorities, programs and levels of commitment since the project was originally funded? Although some momentum has been lost since the Rana Plaza building collapse in 2013, fire and building safety remains a priority due to the pressure placed on the government by international buyers, governments, and NGOs. While the government is committed to ensuring fire and building safety, it lacks the capacity and, in some cases, the motivation to ensure fire and building safety. To address the government's lack of capacity, the ILO has helped the government establish the RCC, which provides inspection and remediation services. While the RCC is expected to transition into a national regulatory body, it appears that the transition will take many years making initiatives like the Accord, Alliance, and other NGO programs indispensable.

4.2. Validity of Project Design

Did the project have a logical and realistic design with clearly defined outcomes and outputs and were the critical assumptions stated in the project document realistic? The development objective (improved representation and protection of workers in the RMG sector) does not clearly describe the impact the project's strategy aims to achieve. The project's capacity building activities are intended to translate into decreased risk and fewer fire-related accidents, deaths, and injuries. The theory of change would be better served if the development objective had been stated in these terms. The outcomes, on the other hand, are clearly written, reflect improvements in knowledge and practices, follow a tight cause and effect causal logic, and contribute to improved fire and building safety in RMG factories. The four assumptions identified in the original project document were realistic and generally held true throughout the life of the project.

Was the theory of change validated through implementation? The evaluator was not able to determine whether the theory of change was validated through project implementation because the project's PMP does not include the appropriate impact or effect level indicators to measure the achievement of outcomes. Based on anecdotal information ascertained during interviews, the evaluator believes that union leaders and, to a certain extent, general workers improved their knowledge of fire and building safety risk and have taken important actions to address the risk.

4.3. Project Performance

How appropriate and useful have the performance indicators been in terms of the project's ability to assess progress at outcome and output levels? The project is on track to achieve or overachieve nearly all of the indicator targets. The project has 13 effect level indicators that attempt to measure changes in knowledge, behavior, or practices. However, some are not well defined and others are difficult to verify. The project would have benefited from a more rigorous M&E system including baseline and endline surveys measuring changes in a core set of well-defined fire and building safety indicators such as safety hazards, fires, and other incidents. The lack of a baseline data made it difficult to fully validate the project's theory of change.

4.4. Effectiveness of Strategies

How have trade union representatives and organizers used knowledge, skills, and improved understanding of fire and building safety? The training resulted in an increase in knowledge on fire safety and general building hazards and practices including inspections and how to report hazards to factory management and the DIFE. Trade union leaders use lunch breaks to talk to fellow workers about fire and building safety hazards. Union organizers and leaders also collaborated with the SC to conduct joint workplace training on fire and building safety for workers. Trade union leaders also identify safety hazards in factories and report them to factory management.

How can training effectiveness be improved? Training effectiveness can be improved by conducting more joint workplace training with managers, providing more frequent refresher training to union leaders and workers, using relevant video clips about fire and building safety, and using more dynamic and participatory training methodologies.

To what extent have project education activities helped improve engagement between workers and their organizations, employers and government officials? The fire and building safety certification course helped improve union leaders' abilities to engage factory managers in a dialogue regarding workplace safety issues and seeking remediation with the DIFE, Accord, or Alliance.

Have the trainings and education activities had any other impacts? Do employers and workers perceive a change in value added or increased respect provided by the workers trained by the project? The fire and building safety certification course also helped increase union leaders' self-confidence and respect from management and co-workers. Some union leaders are taking on new leadership roles in the factory and in their communities.

What have been the challenges? Trade union leaders face a range of challenges in addressing fire and building safety hazards, which include the threat of being fired if they report safety hazards, difficulty in convincing factory managers to allow workers to participate in fire and building safety training, and convincing families of some union leaders to allow them to participate in the project's activities. The DIFE's lack of capacity and resources is another important challenge in addressing fire and building safety hazards in factories covered by the NAP.

4.5. Efficiency and Use of Resources

To what extent, if any, have the expenditures been cost-effective so far? The project's country staffing structure, which consists of the project director and program officer, is highly cost-effective since it accounts for only 13 percent of the total budget. However, when SC headquarters personnel and indirect rate costs are added, the project becomes less cost-effective.

To what extent have expenditures duplicated ILO or other efforts? The evaluator was unable to identify duplicity of expenditures between the ILO and SC F&BS projects. These projects have different strategies, activities, and target groups. For example, the ILO F&BS project aimed to improve fire and building safety laws and policies while building the capacity of key sector actors such as the DIFE and FSCD. The SC F&BS project aims to build the capacity of trade union organizers and leaders as well as general workers to identify fire and building safety hazards and work with the factory management, DIFE, Accord, and Alliance to remedy the hazards.

How does scheduled/planned activity completion compare to project spending or quarterly funding drawdown and considering the revised end date of March 2019 and what is the likelihood that planned activities, outputs and outcomes will be completed or achieved on time? The project's budget is underspent by nine percent. To expend the remaining funds in the budget by March 31, 2018, the project will need to increase its monthly expenditures from USD 16,260 to USD 28,943. The project needs a clear plan and revised budget to ensure that grants funds are fully expended by the end of the project.

Have resources been allocated and used strategically to achieve the three long-term outcomes? What are the factors that have hindered timely delivery of outputs? The amount allocated to the three outcomes is USD 1,026,663. Approximately, 42 percent of the total is allocated to Outcome 1, which is reasonable since it includes the fire and building safety certification training for union organizers and leaders. Twenty-nine percent of the total outcome budget is allocated to Outcome 2 and another 29 percent is allocated to Outcome 3. The evaluator considers the allocation resources to the outcomes adequate. The factors that hindered timely delivery of outputs are essentially the challenges discussed above under strategy effectiveness.

4.6. Effectiveness of Project Management

To what extent have project management capacities and staffing arrangements supported or limited the achievement of the planned results? Are there any lessons learned with respect to staffing? As noted above under the discussion of cost-effectiveness, the project staffing consisted of the project director and program officer. Fire and building safety experts were hired to deliver the training for the certification course. The SC country program director and administrative and finance staff provided support to the project. While the staffing structure is highly efficient and adequate for achieving the three outcomes, the overall effectiveness could have been increased by including a technical program officer for the three main technical areas: fire safety, building structure integrity, and electrical hazards.

Has the project coordinated and collaborated with the ILO F&BS project in ways that created synergies? While the objectives and target groups of the ILO F&BS project and the SC F&BS project were significantly different, the two projects could have collaborated more on fire and building safety training for trade union leaders and workers aimed at reducing risks in the NAP factories.

Has the project coordinated and collaborated with other projects in ways that increased effectiveness and impact? The project has collaborated closely with the Accord because it employs a tripartite approach that includes trade unions and it has an effective complaint mechanism supported by the threat of factories losing orders from the Accord signatory brands if factories do not address fire and building safety hazards. The project has also invited the DIFE, FSCD, BGMEA, Accord, and Alliance to attend the certification courses to explain responsibilities and initiatives of each organization and how they can be used as resources by trade union leaders. Beyond participation the certification courses, the DIFE, FSCD, and BGMEA have not collaborated formally with the SC F&BS project. However, written agreements with these agencies would have facilitated more formal collaboration.

4.7. Sustainability

What progress has the project made in implementing the sustainability plan? The project has made significant progress in achieving the indicator targets associated with the sustainability plan. This includes an existing *training curriculum*, 389 *worker resource people* trained, 25 CBAs with fire and building safety language, and important linkages created between the trade unions and the FSCD, DIFE, Accord, and Alliance. The project has also trained 24 master trainers and is in the final stages of developing the data management system.

To what extent are the project's outcomes, including training mechanisms, likely to be durable and maintained by local stakeholders after external assistance has ended? Those outcomes and outputs most likely to be sustained are fire and building safety knowledge and skills (short-term), fire and building safety remediation in the Accord factories, federations disseminating fire and building safety information to members, joint workplace training in committed factories, the CBAs, and the data management system by the more capable federations who have the resources (human and financial) to operate the system.³⁰ The outcomes and outputs least likely to be sustained are fire and building safety knowledge and skills (long-term), fire and building safety remediation in the Alliance and NAP factories, joint workplace training not supported by committed factories, and training conducted by the master trainers (federations).

What actions should the SC, GOB and USDOL take to ensure sustainability of the impacts produced by this project beyond the remaining period of the project? Should the plan be adjusted for the remaining life of the project and, if so, how? The project should consider three adjustments to the sustainability plan in the last eight months of the project. The first

³⁰ It should be noted that, at the time of the final evaluation, the data management was near completion and was in the process of being transferred to two trade union federations.

is to focus capacity building efforts on those federations and factory level trade unions that are the strongest and most organized and motivated to continue to address fire and building safety activities in factories through safety committees. The second involves having trade unions plan and conduct OSH activities for workers without the financial assistance of the project in order to gain experience and confidence to operate independently. The third is to strengthen the linkages with institutional fire and building safety resource organizations such as the Accord, Alliance, FSCD, and DIFE for the NAP factories.

4.8. Lessons and Good Practices

What lessons learned and good practices can be identified that could be replicated in other countries? The evaluator identified a range of lessons and good practices, which could be replicated in other countries by both USDOL and the SC.

- Fire and building safety training could include related OSH issues such as the hygiene, management of dangerous chemicals and the use of personal protective equipment, which helps make factories safer for workers.
- Projects can leverage the OSH training to build trust and confidence between trade unions and factory management. Working with factory management to resolve OSH issues is less contentious than working on minimum wages, benefits, work hours, and production targets.
- Fire and building safety training provides new technical knowledge and skills to trade union leaders that helps build their confidence and earns new respect from co-workers and factory managers making them stronger leaders in the factories and in their communities.
- Training trade union leaders and factory managers together improves relationships between trade unions and management and increases the likelihood that management will work to resolve fire and building safety hazards.
- The remediation of fire and building safety risk (including broader OSH issues) is greatly facilitated when there is economic pressure on factories to comply with standards. For example, the SC F&BS project was most successful in achieving its indicator targets in Accord factories because the Accord signatory brands agreed to cancel orders with factories that do not comply with its safety standards. Associating non-compliance with a negative economic consequence, like Accord, is an effective lever.

V. RECOMMENDATIONS

The following recommendations are intended to provide the SC F&BS project staff and USDOL with suggested actions that can further strengthen project outputs and outcomes and increase the potential for sustainability given the project will end within the next eight months as well as improve performance of future projects.

5.1. Develop Accelerated Expenditure Plan

The SC F&BS project should develop a plan, including an adjusted budget, to expend the remaining funds in the grant before the project ends on March 31, 2019. The budget is underspent by nine percent with approximately ten months remaining before the project ends.³¹ To expend the remaining funds, the project needs to nearly double its monthly expenditures from USD 16,260 to USD 28,943. The accelerated expenditure plan, however, should be carefully crafted so it does not jeopardize the chances of sustaining key outcomes and outputs. For example, the project should not financially support activities that the trade unions would be expected to support once the project ends. This principle is consistent with one of the key lessons from the USAID post project impact study. The expenditure plan and adjusted budget should also include the full costs of the program officer and a method to track the project director's effort to ensure that 67 percent is spent on the SC F&BS project.

5.2. Revise Sustainability Plan

The SC F&BS project should revise its sustainability plan to incorporate the following adjustments:

- Focus capacity building efforts on those federations and factory level trade unions that are the strongest and most organized and motivated to continue to address OSH activities in factories through safety committees. Building the capacity of safety committees should be a priority since they are mandated by the BLA and will remain once the project ends.
- Begin immediately to have federations and their factory level trade unions plan and conduct OSH activities for workers without the financial assistance of the project, which would represent a gradual transition and allow trade union partners to operate independently and gain experience and confidence.
- Strengthen the linkages between the trade unions and institutional fire and building safety resource organizations such as the Accord, Alliance, FSCD, and DIFE for the NAP factories, which could involve signing formal agreements between the federations and these organizations.

³¹ The remaining time of 10 months is based on the most recent expenditure budget provided the evaluator, which is May 31, 2018.

5.3. Improve Training Methodologies

The SC F&BS project should incorporate more participatory, adult learning methods into future training sessions to increase training effectiveness.³² Research on adult learning shows that training tends to be more effective when participants have been involved in defining or refining their own learning objectives; the content is focused on real problems faced by the participants; and training is undertaken in a varied and participatory environment. This thinking supports a standard training model known as the learning cycle that involves experiencing, observing, thinking, and applying.³³ In addition to these principles of adult learning, future training should incorporate problemsolving exercises, role playing, and appropriate use of fire and building safety tools.

5.4. Combine Fire and Building Safety and OSH

When funding or implementing similar projects in the future, USDOL and SC should consider combining fire and building safety with related OSH issues such as the management of dangerous chemicals and the use of personal protective equipment. One of the key lessons learned from the SC F&BS project is that combining fire and building safety with related OSH issues increases effectiveness for several reasons. First, the two issues share common safety concerns (e.g. safe management of chemicals and use of protective equipment. Second, fire and building safety can be more easily sustained within a broader mandate of OSH in workplaces. Finally, combining fire and building safety with OSH represents a more holistic approach to worker health and safety.

5.5. Leverage OSH to Strengthen Union Leadership

USDOL and SC should use OSH, including fire and building safety, as a lever to strengthen union leadership and improve relations between factory management and trade unions in future projects that have similar objectives. Another key lesson learned from the SC F&BS project is that the acquisition of technical knowledge and skills increased the confidence and leadership of trade union leaders and gained them the respect of factory managers and co-workers. In turn, these attributes helped the trade union leaders effectively engage factory managers in dialogue about safety hazards and seek remediation. Learning to collaborate with factory management on less controversial OSH issues can pave the way to constructively engage management on more controversial issues such as minimum wage, work hours, and production targets.

5.6. Develop Robust M&E Systems

USDOL and SC should develop more robust M&E systems for future projects they fund or implement. While, in general, the SCF&BS project has a logical project design and

³² The evaluator acknowledges that the project incorporates practical hands-on methods in its training. The recommendation is meant to assess how even more practical and participatory methods can be incorporated to increase effectiveness.

³³ <https://www.simplypsychology.org/learning-kolb.html>

theory of change, its M&E system lacked the rigor required to provide evidence that the outcomes were achieved and, ultimately, fire and building safety in RMG factories improved. More specifically, the PMP should include precise effect or impact level indicators for each outcome, ambitious but achievable indicator targets, definitions of terms used in the indicators to facilitate measurement, how the indicator is to be measured, data sources, data collection tools, and how data are to be analyzed including use of information systems/software to facilitate storage and analysis.³⁴ The M&E system should also include practical baseline and endline surveys to assess changes in the effect and impact level indicators.

³⁴ Effect level indicators measure changes in knowledge, behaviors, and practices while impact level indicators measure changes in conditions (e.g. number of fires, persons injured or killed by fires, illnesses related to OSH hazards, etc.)

ANNEXES

Annex A: Terms of Reference

AN INDEPENDENT FINAL EVALUATION OF IMPROVING FIRE AND BUILDING SAFETY FOR BANGLADESH'S READY-MADE GARMENTS WORKERS

The U.S. Department of Labor (USDOL) has contracted O'Brien and Associates, International (OAI) to undertake the final evaluation of the *Improving Fire and Building Safety for Bangladesh's Ready-Made Garments Workers* project in Bangladesh. The project is funded by USDOL and implemented by the Solidarity Center. The evaluation is intended to assess and document the achievements of the project, assess the likelihood of sustaining key project outputs and results, and document lessons learned that could be applied to other USDOL-funded projects.

The following Terms of Reference (TOR) serves as the framework and guidelines for the evaluation. It is organized according to the following sections.

1. Background of the Project
2. Purpose, Scope, and Audience
3. Evaluation Questions
4. Evaluation Management and Support
5. Evaluation Methodology
6. Evaluation Milestones and Timeline
7. Deliverables and Deliverable Schedule
8. Evaluation Report

1. Background of the Project

Context

The Bangladesh ready-made garment (RMG) sector has grown exponentially to between 4-5 million workers (of which approximately 80 percent are women), including those in support and ancillary industries, working in 5,000-plus factories. The industry exported USD 15 billion in 2010 alone. Bangladesh has now risen to the position of the second largest garment exporter in the world, behind China, and it is ranked the third largest exporter of RMG products to the European Union (EU) and the fourth largest exporter to the United States (US). The RMG industry is the most important one in Bangladesh, accounting for 13 percent of gross national product, 75 percent of total exports, and 80 percent of foreign exchange earnings. However, the growth of this massive sector has also brought immense problems related to fire and building safety, the repression of worker rights, including freedom of association, and the government's inability to effectively enforce labor laws. The result of this environment is exemplified by the fire in November 2012 at the Tazreen Apparels factory, which killed at least 112 workers, and the collapse of the Rana Plaza building (housing numerous garment factories), which left at least 1,129 workers dead and many more injured. In the last few years alone, worker leaders and

activists from the garment sector in Bangladesh have been harassed, fired, arrested, beaten, and even killed with impunity for exercising their rights to seek safe and decent workplaces.

In June 2007, the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) filed a petition under the Generalized System of Preferences (GSP) tariff benefit program to the US Trade Representative (USTR). The petition sought the removal of Bangladesh from the list of eligible developing countries due to the Government of Bangladesh's (GOB's) violation of International Labor Organization (ILO) core labor standards, including the freedom of association and the right to collective bargaining. The petition attempted to pressure the companies and the GOB to improve the situation in the RMG industry (as well as the seafood and export processing zones sectors). However, the GOB was generally unresponsive until the Tazreen and Rana Plaza disasters, and the decision in June 2013 by the USTR to suspend Bangladesh's eligibility from the GSP program until concrete improvements were made. As a direct result of the Tazreen fire, the GOB has developed and committed to implement a "National Tripartite Plan of Action on Fire Safety for the Ready-Made Garment Sector in Bangladesh" (NAP). However, while NAP addresses physical problems, it does not address rights-based issues, such as freedom of association and the right to collective bargaining.

Pressure from the suspension of GSP privileges, along with two new initiatives known as the Accord on Fire and Building Safety (*Accord*) and the Global Alliance for Bangladesh Worker Safety (*Alliance*), have the potential to further open the space for workers to more freely organize, obtain legal registration for their unions, and bargain with employers. Most recently, the US formally joined the Sustainability Compact for Continuous Improvements in Labor Rights and Factory Safety in the Ready-made Garment and Knitwear Industry in Bangladesh ("the Compact"), which also involves the EU, the GOB and the ILO. The US government also released an Action Plan for Bangladesh to serve as a roadmap of key progress indicators for the GOB to meet in order to regain GSP benefits; the registration and protection of unions are key elements of this plan. Chiefly as a result of the GSP process, in the last eight months, thirty new unions have been registered in the RMG sector where none had successfully been able to register in the previous five years. These developments potentially provide a unique opportunity for simultaneous progress on many fronts: the capacity of the GOB to enforce its own laws with regard to building and fire safety; the ability of companies, brands, and workers to contribute to improving working conditions; and the realization of workers' rights to freely organize and engage in collective bargaining, with special attention to fire and building safety.

According to the Bangladesh Ministry of Labor and Employment (MoLE), there are 36 national and regional garment federations and 146 local plant-level garment unions. For the AFL-CIO's GSP petition, the SC provided documentation of the existence of only 137 plant-level garment unions, and of those, just 11 were actually functional. In reality, there are many "unions" that are simply fronts for political parties and do not represent workers' interests, while there are only a handful of truly independent union federations, and these are generally small, weak, and struggling to survive and expand. New, independent, factory-level unions that formed during the past eight months are just at the initial stages of attaining the skills to represent workers effectively. Union federations have operated in

an environment of intense employer and government resistance. As factory owners and government officials are sometimes one and the same, unions have faced significant challenges in organizing, gaining registration, running independent elections, and bargaining collective agreements. If unorganized workers refuse to enter an unsafe factory, they are harassed, threatened with the nonpayment of wages or loss of employment, and sometimes even beaten. Trade union federations will require technical assistance and mentorship to help develop and support the nascent factory-level unions they have worked so hard to form.

Objectives and Expected Outcomes

The SC F&BS project is predicated on the following *theory of change*. If a combination of informed worker and union behavior (advocacy, organizing, bargaining and engagement with stakeholders) develops as a result of the SC's technical assistance and multi-stakeholder pressure (the international union movement and NGO community, brands, the ILO, the US and foreign governments, etc.), then the GoB and RMG employers will be motivated to improve workplace fire and building safety standards and enforce existing laws that allow democratic unions to represent increasing numbers of members. This will in turn lead to a safer RMG industry.

The project's *overall objective* is to improve the representation and protection of workers in the RMG sector related to fire and general building safety. The *long-term outcomes* of this project include:

1. Improved capacity of workers and worker organizations to engage in effective dialogue with the GOB and employers on fire and general building safety strategic plans, including NAP and related initiatives;
2. Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate GOB authorities and/or factory managers; and
3. Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.

2. Purpose, Focus, and Audience of Evaluation

The purpose of the final evaluation is to:

1. To review the achievements and performance of the project (extent to which the objectives, outcomes and targets have been achieved).
2. To identify additional opportunities (entry points) and lessons learned as input for other initiatives for similar fire and building safety projects in Bangladesh and elsewhere.
3. To identify best practices that have bolstered the sustainability of the results achieved.

The SC F&BS project will be evaluated through the lens of a diverse range of stakeholders that participate in and are intended to benefit from the project's interventions. Data will be collected from selected project documents and reports and interviews with key project personnel, partners, and stakeholders in Bangladesh.

The primary **audiences** of the evaluation are USDOL and the SC. Both organizations intend to use the evaluation report to determine the strengths and weaknesses of the project design and implementation.

3. Evaluation Questions

To serve these purposes, this final evaluation will focus on documenting key achievements and lessons that USDOL and SC can apply to similar projects, and the likelihood of sustaining key results and outputs.

Evaluation Area	Evaluation Question
Relevance and strategic fit	1. To what extent is the project still relevant to the priorities and needs of the Government of Bangladesh and other key stakeholders considering the evolving needs, priorities, programs and levels of commitment since the project was originally funded?
Validity of the project design	2. Did the project have a logical and realistic design with clearly defined outcomes and outputs? Were the critical assumptions stated in the Project Document realistic? 3. Was the theory of change validated through implementation (results/performance data)?
Project Performance	4. How appropriate and useful have the performance indicators been in terms of the project's ability to assess progress at outcome and output levels?
Effectiveness of Strategies	5. How have trade union representatives and organizers used knowledge, skills, and improved understanding of fire and building safety (including sharing lessons with coworkers)? How can training effectiveness be improved (new topics, methods)? 6. To what extent have project education activities helped improve engagement between workers and their organizations, employers and government officials? Have the trainings and education activities had any other impacts? What have been the challenges? 7. Do employers and workers perceive a change in value added or increased respect provided by the workers trained by the project?
Efficiency	8. To what extent, if any, have the expenditures been cost-effective so far? To what extent have expenditures duplicated ILO or other efforts? How does scheduled/planned activity completion compare to project spending or quarterly funding drawdown and considering the revised end date of March 2019? What is the likelihood that planned activities, outputs and outcomes will be completed or achieved on time? 9. Have resources been allocated/ used strategically to achieve the three long-term outcomes? What are the factors that have hindered timely delivery of outputs? What measures have been put in place to mitigate further delays?
Management Effectiveness	10. To what extent have project management capacities and staffing arrangements supported or limited the achievement of the planned results? Are there any lessons learned with respect to staffing?

Evaluation Area	Evaluation Question
	11. Has the project coordinated and collaborated with the ILO Fire and General building Safety project in ways that created synergies? Has the project coordinated and collaborated with other projects in ways that increased effectiveness and impact?
Impact	12. Are workers and worker organizations better able to engage in effective dialogue with the government and employers on fire and general building safety strategic plans, including the National Action Plan (NAP) and related initiatives? 13. Has the knowledge of workers on fire safety and general building hazards and practices increased (including fire-safety inspections and means to report and propose remediation to the appropriate government authorities and/or factory managers)? 14. Does analysis of the project's monitoring data indicate that workers' organizations' are more effectively representing workers (collectively or individually) on fire and general building safety matters to ensure that their rights and interests are effectively protected?
Sustainability	15. To what extent are the project's outcomes likely to be durable and maintained by local stakeholders after external assistance has ended? What actions should the SC, GOB and USDOL take to ensure sustainability of the impacts produced by this project beyond the remaining period of the project? 16. What progress has the project made in implementing the sustainability plan (sustainability factors)? Should it be adjusted for the remaining life of the project and, if so, how? 17. Do the project's training mechanisms contribute to sustainability?
Lessons and Good Practices	18. What lessons learned and good practices can be identified that could be replicated in other countries (including a more focused OSH-related interventions)?

4. Evaluation Management and Support

Roles and Responsibilities

The evaluator is responsible for conducting the independent final evaluation according to the terms of reference (TOR). He will:

- Receive, respond to or incorporate input from SC and USDOL on the initial TOR draft.
- Finalize and submit the TOR and share (concurrently) with SC and USDOL.
- Review project background documents.
- Review the evaluation questions and refine the questions, as necessary.
- Develop and implement an evaluation methodology (i.e., surveys, conduct interviews, review documents) to answer the evaluation questions.
- Conduct planning meetings/calls, as necessary, with USDOL and SC
- Decide composition of field visit interviews to ensure objectivity of the evaluation.
- Present verbally preliminary findings to project field staff and other stakeholders as determined in consultation with USDOL and SC.
- Prepare an initial draft (48-hour and 2-week reviews) of the evaluation report and share with USDOL and SC.
- Prepare and submit final report.

USDOL is responsible for:

- Providing input to the TOR.
- Reviewing proposed evaluator.
- Providing project background documents to the evaluator (responsibility is shared with SC).
- Briefing SC on upcoming visit and work with them to ensure coordination and preparation for evaluator.
- Reviewing and providing comments of the draft evaluation reports.
- Approving the final draft of the evaluation report.
- Participating in the pre- and post-trip debriefing and interviews.

SC is responsible for:

- Reviewing the TOR; providing input, as necessary, directly to the evaluator and agreeing on final draft.
- Providing project background materials to the evaluator as requested.
- Preparing a list of recommended interviewees.
- Scheduling meetings for field visit and coordinating all logistical arrangements.
- Reviewing and providing comments on the draft evaluation reports.
- Organizing, financing, and participating in the stakeholder debrief.
- Providing local transportation to meetings and interviews.
- Including USDOL program office on all written communication with evaluator.

5. Evaluation Methodology

The evaluation shall draw on six methods: 1) review of documents, 2) review of operating and financial data, 3) interviews with key informants, 4) field visits, 5) a stakeholder meeting to present and discuss preliminary findings, and 6) a post-trip debrief call with USDOL and SC.

Document Review: The evaluator will review the following documents before conducting any interviews or trips in the region.

- The Project Document (ProDoc)
- Previous evaluation reports
- Cooperative Agreement (CA)
- Technical Progress Reports (TPRs), financial reports, and donor comments
- Reports on specific project activities
- Training materials
- Trip reports, field visits, meetings, needs assessments and other reports
- Results Framework/Logic Model, PMP, Data Tracking Tables and performance indicators
- Work plans and budgets

- Any other relevant documents

Interviews with key informants: Interviews are to be conducted with key program stakeholders (by phone, Skype or in-person) including (but not limited to):

- USDOL project management team.
- Relevant SC officials in Washington DC.
- SC Bangladesh officials and project key personnel and staff.
- Government counterparts and related agencies.
- Union representatives, organizers, and labor activists.
- Other collaborating projects and partners, as appropriate

Fieldwork in Bangladesh: The evaluator will meet the project directors and project teams to discuss the purpose and logistics of the evaluation. In addition, the project team will assist the evaluator to schedule interviews with the key informants listed above and any others deemed appropriate.

The evaluator will interview some key informants separately and others in small focus groups, as appropriate. The evaluator will work with project staff to develop a list of criteria that will be used to select a non-random sample of site visits / key informants to interview. Interviews with all relevant SC representatives outside Bangladesh will be conducted by telephone (or Skype) once the fieldwork is completed. Specifically, the evaluator will conduct key informant interviews or focus group discussions with the following:

- Solidarity Center: Chris Johnson-Country Program Director; Rakib Hasan- Project Director; AKM Nasim: Senior Labor Lawyer; others
- Trade union leaders and workers- focus groups and/or individual interviews
- Trained fire and building safety resource people/master trainers
- Federation organizers- visits to federation offices can be arranged
- Department of Inspections for Factories and Establishments (DIFE) officials
- Employers who have participated in joint workplace trainings

The exact itinerary will be determined based on scheduling and availability of interviewees. Meetings will be scheduled in advance of the field visit by the project staff, coordinated by the designated project staff, in accordance with the evaluator's requests and consistent with these terms of reference. All interviews and meetings will be conducted in English or translated into Bangla with the assistance of a professional translator. *The evaluator must conduct interviews with beneficiaries and stakeholders without the participation of any project staff.*

USDOL is interested to learn from and apply good practices to its projects as well as communicate them to USDOL audiences through its communication strategy. To contribute to this compilation of good practices, the evaluator will identify and document good practices and successes during interviews with project beneficiaries and stakeholders along with pictures (when feasible) and compelling quotes that evoke the person's hopes for the future. The goal is to show how ILAB-funded interventions help USDOL meet its mission by telling the story of a particular person whose life has either been transformed

as a result of the project or who is better able to positively impact the lives of others thanks to the project. The purpose of these vignettes is to raise awareness of international worker rights and the work ILAB is doing to advance them. Any pictures or quotes gathered by the evaluator from interviewees should be accompanied by a signed waiver (see Attachment A) granting USDOL the right to use and publish their name, words, and photo through any medium in USDOL publications.

Stakeholder debriefings: Before departure from Bangladesh, the evaluator will conduct a debriefing meeting with project staff and key stakeholders to present and discuss initial findings of the evaluation and solicit input from stakeholders.

Post Trip Debriefings: Upon return from Bangladesh, the evaluator will provide a post-trip debrief by phone to relevant USDOL and SC staff to share initial findings and seek any clarifying guidance needed to prepare the report. If applicable, the evaluator will clearly describe the constraints generated by the retrospective nature of this evaluation methodology and data collection and how those constraints could be avoided in future evaluations.

Ethical Considerations: The evaluator will observe utmost confidentiality related to sensitive information and feedback elicited during the individual and group interviews. To mitigate bias during the data collection process and ensure a maximum freedom of expression of the implementing partners, stakeholders, communities, and beneficiaries, implementing partner staff will generally not be present during interviews. However, implementing partner staff may accompany the evaluator to make introductions whenever necessary, to facilitate the evaluation process, make respondents feel comfortable, and to allow the evaluator to observe the interaction between the implementing partner staff and the interviewees.

Limitations: The scope of the evaluation specifies up to two weeks of fieldwork, which is not enough time to visit all of the project sites to undertake data collection activities. As a result, the evaluator will not be able to consider all sites when formulating his findings. All efforts will be made to ensure that the evaluator is visiting a representative sample of sites, including some that have performed well and some that have experienced challenges.

This is not a formal impact assessment. Findings for the evaluation will be based on information collected from background documents and in interviews with stakeholders, project staff, and beneficiaries. The accuracy of the evaluation findings will be determined by the integrity of information provided to the evaluator from these sources and the ability of the latter to triangulate this information.

6. Evaluation Milestones and Timeline

Activity	Date	Products/Comments
Prepare and submit TOR	May 25	Draft TOR
Evaluator logistics and kick-off call with USDOL	May 24	
Doc reviews, methodology, data collection instruments	June 11-15	Final evaluation questions Methodology section

Activity	Date	Products/Comments
		Instruments
Fieldwork in Bangladesh	June 18-28	Preliminary findings presentation
Stakeholder Meeting	June 28	Power Point presentation slides
USDOL and SC debrief calls (separately)	July 5	Debrief notes
Analysis and report writing	July 2-20	
Send first draft report for 48-hour review	July 23	Draft Report 1
Revise and send second draft report for 2-week review	July 25	Draft Report 2
Finalize and send final report	August 22	Final Report

7. Deliverables and Deliverable Schedule

- A. Finalized TOR with USDOL and SC consensus, May 31, 2018
- B. Methods to be used during field visit, including itinerary, June 15, 2018
- C. Stakeholder debriefing meeting/presentations, June 28, 2018
- D. USDOL and SC debrief calls, July 5, 2018
- E. Draft Report 1 to USDOL and SC, July 23, 2018
- F. Draft Report 2 to USDOL and SC by July 25, 2018
- G. Final Report to USDOL and SC by August 22, 2018

8. Evaluation Report

The evaluator will complete a draft report of the evaluation following the outline below and will share it with USDOL and SC for an initial 48-hour review. Once the evaluator receives comments, they will make the necessary changes and submit a revised report. USDOL and SC will have two weeks (ten business days) to provide comments on the revised draft report. The evaluator will produce a second draft incorporating the comments from USDOL and SC where appropriate and provide a final draft report within five days of having received comments on the two-week review.

The final version of the report will follow the format below (page lengths by section illustrative only) and be no more than 50 pages in length, excluding the annexes:

Report

1. Title page
2. Table of Contents and Lists (tables, graphs, etc.)
3. Acronyms
4. Executive Summary
5. Background and Project Description
6. Purpose of Evaluation

7. Evaluation Methodology
8. Findings - This section should be organized around the six key issues outlined in the TOR
 - a. Relevance
 - b. Validity of the Project Design
 - c. Project Progress (Achieving Indicator Targets)
 - d. Effectiveness of Project Strategies
 - e. Management Effectiveness
 - f. Sustainability
 - g. Lessons Learned and Good Practices
9. Conclusions
10. Recommendations
11. Annexes
 - Terms of reference
 - Strategic Framework/Theory of Change
 - List of meetings and interviews
 - Any other relevant documents

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Address and phone number

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Annex B: Interview Guides and Data Collection Matrix

Master List of Questions

1. To what extent is the project still relevant to the priorities and needs of the Government of Bangladesh and other key stakeholders considering the evolving needs, priorities, programs and levels of commitment since the project was originally funded?
2. Did the project have a logical and realistic design with clearly defined outcomes and outputs? Were the critical assumptions stated in the Project Document realistic?
3. Was the theory of change validated through implementation (results/performance data)?
4. How appropriate and useful have the performance indicators been in terms of the project's ability to assess progress at outcome and output levels?
5. How have trade union representatives and organizers used knowledge, skills, and improved understanding of fire and building safely (including sharing lessons with co-workers)? How can training effectiveness be improved (new topics, methods)?
6. To what extent have project education activities helped improve engagement between workers and their organizations, employers and government officials? Have the trainings and education activities had any other impacts? What have been the challenges?
7. Do employers and workers perceive a change in value added or increased respect provided by the workers trained by the project?
8. To what extent, if any, have the expenditures been cost-effective so far? To what extent have expenditures duplicated ILO or other efforts? How does scheduled/planned activity completion compare to project spending or quarterly funding drawdown and considering the revised end date of March 2019? What is the likelihood that planned activities, outputs and outcomes will be completed or achieved on time?
9. Have resources been allocated/ used strategically to achieve the three long-term outcomes? What are the factors that have hindered timely delivery of outputs? What measures have been put in place to mitigate further delays?
10. To what extent have project management capacities and staffing arrangements supported or limited the achievement of the planned results? Are there any lessons learned with respect to staffing?
11. Has the project coordinated and collaborated with the ILO Fire and General building Safety project in ways that created synergies? Has the project coordinated and collaborated with other projects in ways that increased effectiveness and impact?
12. Are workers and worker organizations better able to engage in effective dialogue with the government and employers on fire and general building safety strategic plans, including the National Action Plan (NAP) and related initiatives?

13. Has the knowledge of workers on fire safety and general building hazards and practices increased (including fire-safety inspections and means to report and propose remediation to the appropriate government authorities and/or factory managers)?
14. Does analysis of the project's monitoring data indicate that workers' organizations' are more effectively representing workers (collectively or individually) on fire and general building safety matters to ensure that their rights and interests are effectively protected?
15. To what extent are the project's outcomes likely to be durable and maintained by local stakeholders after external assistance has ended? What actions should the SC, GoB and USDOL take to ensure sustainability of the impacts produced by this project beyond the remaining period of the project?
16. What progress has the project made in implementing the sustainability plan (sustainability factors)? Should it be adjusted for the remaining life of the project and, if so, how?
17. Do the project's training mechanisms contribute to sustainability?
18. What lessons learned and good practices can be identified that could be replicated in other countries (including a more focused OSH-related interventions)?

Annex C: List of Documents Reviewed

1. Project Document
2. Performance Monitoring Plan
3. Technical Progress Reports (2013-2018)
4. SC F&BS Sustainability Plan
5. SC F&BS Logical Framework
6. SC F&BS Project Data-Tracking Tables
7. Project budget
8. USDOL Bangladesh Multi-Project Evaluation 2015
9. Management & Procedures Guidelines 2013 for OTLA CAs
10. SC F&BS Project Training Curriculum
11. Bangladesh Labor Assessment (USAID 2014)
12. USDOL Strategic Framework for RMG Sector in Bangladesh
13. Bangladesh Labour Rules 2016 <https://resource.ogrlegal.com/bangladesh-labour-rules-2015-published/>
14. International Labor Organization Bangladesh website www.ilo.org/dhaka/lang--en
15. Accord website www.bangladeshaccord.org
16. Alliance website www.bangladeshworkersafety.org
17. DIFE www.dife.gov.bd

Annex D: List of Persons Interviewed

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