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Executive Summary

The study titled 'State of UNGPs in the RMG Sector of Bangladesh' aims to determine the prevailing status of the human and labour rights situation in Bangladesh's RMG industry and establish how far the scenario is compatible with the United Nations Guiding Principles (UNGPs). The UNGPs form a global standard regarding states' and corporations' obligation to protect and respect the humans-at-work within their frontiers and remedy whatever grievances show up. Ready-made Garments (RMG) sector being the prime and effective source of industrial employment in the country, particularly female employment, Bangladesh could be a test case as an emerging economy for investigating its compliance and non-compliance perspective with national laws and rules designed to protect human and labour rights in line with the UNGP framework.

The study has used a combination of qualitative and quantitative research approaches. Based on the Shift Maturity Index (2015), the study prepared the UNGP adherence index in order to estimate a baseline for human rights compliance according to UNGPs for both individual businesses and the sector as a whole. A nationally representative enterprise-level survey targeting 603 enterprises (18.60% of the total sectoral population) has been conducted during May-June 2021. Surveyed factories have been categorised according to their size, membership and location to analyse results. A workers survey involving 600 workers serving in 200 factories has been carried out to verify the factory information on selected human rights issues. At the same time, a total of seven KIIs (Key Informants Interview) have been undertaken with different stakeholders.

The study reveals that Bangladesh's export-oriented RMG sector is still struggling, as if at the early stage of development, on human rights issues relevant to the guideline of the UNGPs. Following the Shift Index, eight components have been considered that portray micro, macro and cross-sectoral responsibilities of maintaining human rights practices. These eight components are: (a) policy commitment; (b) governance and embedding; (c) prioritisation of risks; (d) stakeholder engagement; (e) assessing human rights risks; (f) integration and mitigation measures; (g) tracking; (h) remedy and grievance mechanisms. The study estimates the level of maturity of RMG factories in view of these eight components.

The study observed that the RMG sector is way behind institutionalising UNGP standards. The UNGP adherence index revealed that all eight indicators of human and labour rights are found to be at the early stage of development – either at 'negligible' (55%-79.80% of

factories) or at the 'preliminary' stage (18.90%-44.30%). However, in a few indicators, the development is at the 'improving' or at the 'established' phase; that is not so significant, though. None of the factories has yet reached the 'matured' stage of development.

As a matter of fact, the study observed that the very concept of UNGPs is not fully clear to the garment manufacturers, although they understand human and labour rights issues. The first step towards overall betterment in this respect should thus be strengthening the reporting system of factories to meet UNGP requirements. There may be some workshops and training sessions targeting the management level staff of the factories on reporting per UNGPs.

The study noticed a disparity in human and labour standards around factory operation in terms of factory size, factory membership and factory location. The large-scale enterprises are ahead in practising better human and labour rights issues than those of medium- and way above the small-scale enterprises. Factories located in Dhaka and Gazipur districts/clusters are found in a better state compared to those located in Narayangonj and Chattogram (formerly Chittagong) districts/clusters. Hence, factories that are rated insignificant in compliance deserve special attention.

Lack of due corporate approach would be a bottleneck for institutionalising UNGPs standards in RMG factories. Required corporate dispensation in the RMG enterprises is by and large at an early stage. Hence, an effective and pro-worker state of management is difficult to initiate and sustain under such a 'top-down' decision-making process within the factories. It is important to ensure that factory management could exercise more authority in undertaking measures and interventions towards improved human and labour rights. The management needs to hire staff with specific responsibilities on industrial relations and human and labour related issues.

Erroneous ways of public disclosure led to weak transparency in human and labour rights practices. Public disclosure is faultily disclosed only to factory workers, government officials and buyers' representatives through posters inside the factory premises. As part of public disclosure, factories should be mandated to maintain their websites with all necessary information on human and labour rights practised in the factories.

The study findings reveal that factory management lacks academic education and is not adequately trained to handle human and labour rights issues. An exclusive UNGP-oriented short- and medium-term training programme needs to be designed. This will require developing the curriculum, taking into account the existing good practices in the RMG industry and good global experiences. Bangladesh Garments Manufacturers and Exporters Association (BGMEA) and Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA) could do the designing of the curriculum with technical support from the ILO and National Skills Development Authority (NSDA). In addition, minimum academic qualifications and professional training ought to be made mandatory for different mid- and senior management positions.

Human and labour rights issues here in factories/enterprises are either pressure-driven or hand-picked. Our study found that some of the issues get good priority to the factory management, such as child labour, living wages, workplace harassment, workplace safety, etc. Some issues again are attached less priority, like layoff, retrenchment and collective bargaining. However, it is important to ensure that all issues relating to UNGPs are included in the public disclosures of the factories. In this case, the Government of Bangladesh Department of Inspection for Factories and Establishments (GOB DIFE) should make it mandatory for RMG factories to include all UNGP related issues in their work process, and DIFE Inspectors should monitor the progress of UNGPs compliance at the factory level. BGMEA and BKMEA should arrange "in-house training" and "capacity building programmes" for their member factories. Further, the factories could be encouraged to take "certification of international standards" relating to workers-related, pollution management and environment-related issues.

Monitoring and Inspection undertaken by the Public Authorities need to be transparent and effective. Lack of magistracy authority in the hands of the inspectors sometimes weaken their position in ensuring factory level compliances. Hence, public monitoring and inspection authorities should better possess and exercise magistracy authority, even at a limited scale, to better monitor and inspect the factories. At the same time, all types of factory related inspection and monitoring information and data, including the official responsible for inspection, need to be made public through respective organisations websites. And such information/data should be updated regularly.

Factory level grievance system does not necessarily ensure workers' rights to justice. Despite the availability of a factory level grievance system, workers are not regularly supporting the system. The number of formal complaints is relatively low, while informal complaints are rather high. Hence, the grievance mechanism needs to be worker-friendly, ensuring both workers' voices and factories' accountability.

Practising human and labour rights appears to be rewarding in the long term but costly in the short term. Factories are mainly concerned about immediate investment. In this respect, brands and buyers would extend technical and financial support; similarly, international development banks could extend low-cost credit support for firms to invest in those issues.

Management and Workers' Interactions in the factories are not outcome-oriented and thus yield no benefit as such. Despite regular interaction between factory management and factory workers through different committees, worker-related issues and concerns remain more or less unattended and unaddressed. Worker-related committees need to be made functional and effective. Registration of trade unions should be encouraged, the registration process needs to be transparent, and the accountability of registering authority needs to be ensured.

Gender Mainstreaming should gain the top-most priority in improving the human and labour rights issues in the RMG sector towards adherence with the UNGPs. Public

disclosure of human rights should be customised with a particular focus on gender. The institutional process to deal with the whole issue of human-cum-labour rights should attach priority to gender issues. The gender representation and gender voice in the factory board need to be ensured to improve the overall gender mainstreaming in factory and business enterprise matters.

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Acronyms

BGMEA	Bangladesh Garments Manufacturers and Exporters Association
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
BLA	Bangladesh Labour Act
CPD	Centre for Policy Dialogue
CHRB	Corporate Human Rights Benchmark
CL	Conditional Logit
CSE	Chattogram Stock Exchange
CSR	Corporate Social Responsibility
CoC	Code of Conduct
DCE	Discrete Choice Experiment
DIFE	Department of Inspection for Factories and Establishments
DOE	Govt. Department of Environment
DOL	Govt. Department of Labour
DSE	Dhaka Stock Exchange
FDI	Foreign Direct Investment
FES	Friedrich-Ebert-Stiftung
FSCD	Fire Service and Civil Defence
GM	General Managers
GNI	Global Network Initiative
GOB DIFE	Bangladesh Department of Inspection for Factories and Establishments
GRI	Global Reporting Initiative
HR	Human Resource
HR	Human Rights
ICMM	International Council on Mining and Metals
ILO	International Labour Organization
IR	International Integrated Reporting

ISO	International Organization for Standardization
KII	Key Informants Interview
LEED	Leadership in Energy and Environmental Design
MNE	Multinational Enterprise
MoC	Ministry of Commerce
MoLE	Ministry of Labour and Employment
MWTP	Marginal Willingness to Pay
NBR	Govt. National Board of Revenue
OECD	Organisation for Economic Co-operation and Development
NSDA	National Skills Development Authority
PC	Participation Committees
PDB	Govt. Power Development Board
RAFI	Reporting and Assurance Framework Initiative
RAJUK	Govt. Rajdhani Unnayon Kortipakshya
RCC	Remediation Coordination Cell
REB	Govt. Rural Electric Board
RMG	Ready-made Garments
RUM	Random Utility Model
SEDEX	Supplier Ethical Data Exchange
TOR	Terms of References
TITAS	Govt. Gas Transmission and Distribution Company
VPSH	Voluntary Principles on Security and Human rights
WASA	Govt. Water Supply and Sewerage Authority
WC	Welfare Committees
WPC	Workers Participation Committee
WRAP	Worldwide Responsible Accredited Production
WTA	Willingness to Accept
WWC	Workers Welfare Committee
UNGP	United Nations Guiding Principle
UNGPBHR	United Nations Guiding Principles on Business and Human Rights
UNGPRF	United Nations Guiding Principles Reporting Framework
UNHRC	United Nations Human Rights Council

1. Introduction and Objectives of the Study

The United Nations Guiding Principles (UNGPs)[1] is the guiding international document for states and enterprises to comply with human rights in business operations and, more broadly, to ensure sustainable industrial development in a country. The UNGPs facilitate states to comply with their obligations to respect, protect and fulfil human rights; on the other hand, it facilitates business enterprises to comply with national laws and rules on human rights. In case of the study on the practice of UNGPs in the RMG sector, it works as the observance of international HR (Human Rights) standards in the overall operation. The export-oriented RMG sector, which is a major industry of Bangladesh employing about 2.8 million workers, demands special attention on the practice of human and labour rights issues. Despite various legal, institutional and operational reform measures undertaken during the post-Rana Plaza period 2013 and onwards, the RMG sector still confronts many challenges, including "workplace harassment", "gender discrimination", "lack of social dialogue", "weak institutional monitoring and enforcement mechanism" to address non-compliances, "limited level of awareness" and "lack of capacity building" at the enterprise level in order to ensure social compliance (Moazzem, 2017 and Moazzem et al., 2021).

The COVID-19 pandemic reinforces the need to revisit the practices of states and business enterprises relating to human and labour rights, particularly when the state authorities in developing countries were unable to address the multi-dimensional concerns of their workers. Different levels of non-compliance of international human rights and standards under national laws and rules at the enterprise level and lack of proper enforcement by the states during the pandemic have been alleged to be the major reasons contributing to the failure of factory management to protect workers' rights and ensure their well-being in many developing countries. Bangladesh, an emerging developing country with the majority of industrial employment, predominantly female employment, in the readymade garments (RMG) industry, could be a test case to examine the level of compliance and non-compliance of international human rights and standards under the national laws and rules to protect human and labour rights within the framework of the UNGPs.

Against this backdrop, the study aims to examine the level of adherence of the export-oriented RMG enterprises of Bangladesh to UNGPs with a view to identifying the policy and operational intervention required to improve the compliance standard on human and labour rights. The study seeks to find out the penetration of human rights reporting in accordance with UNGPs in the RMG sector and factors relevant to adherence of UNGPs in the RMG sector and assesses different human rights issues pertinent to the RMG sector. In addition, this study aims to identify a range of interventions that need to be undertaken throughout the RMG value-chain to improve the practice of business and human rights issues through adherence with the UNGPs.

The study will address two research questions as under:

a) What is the extent of adherence to the UNGPs in the RMG sector of Bangladesh?
b) What factors may have played a role in the success or failure centring the adherence to human rights in the RMG sector of Bangladesh?

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[1]United Nations Guiding Principles (UNGPs) are developed by John Ruggie to accommodate the adverse impact of businesses on human rights. United Nations Human Rights Council (UNHRC) unanimously endorsed these principles. For more information about UNGPs, reader may visit https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

2. Analytical Framework of the UNGPs in the Context of the RMG Sector

2.1 Definition and Components of UNGPs

United Nations Guiding Principles on Business and Human Rights (UNGPBHR) are the global standard for states and businesses, which recognises their responsibility to protect, respect and remedy humans within their bounds. Figure 1 presents the three pillars of UNGPs and their number of foundational and operational principles. The first pillar of UNGPs comprising ten principles designates states duty on human rights to forestall and checkmate inhumane business practices. The second pillar is directed towards the business firm's respect for human rights issues. These 14 principles grossly detail the duty and responsibility of the business concerns towards human rights issues. This starts with setting up policy commitments to uphold human rights towards internal remedial measures if some rights are violated. Finally, the third pillar dictates that states and business firms must take to appropriate and constructive remedies when human rights are ignored and violated. This study aims to evaluate the state of consciousness and implementation of UNGPs in Bangladesh's RMG sector utilising the UNGPs reporting framework (UNGPRF) (Shift, 2015a).

Under the first pillar on 'the state duty to protect human rights', the two foundational principles are: (a) States must protect the workers against human rights abuse within their territory and/or jurisdiction by third parties, including business enterprises; this protection requires taking appropriate steps to prevent, investigate, punish and redress such abuse through effective policies, legislation, regulations and adjudication; and (b) States should set out clearly the expectation that all business enterprises domiciled in their territory and/or jurisdiction respect human rights throughout their operations. These foundational principles are attained through operational postulates, which include- (a) general State regulatory and policy functions; (b) the State-business nexus; and (c) ensuring policy coherence.

Figure 1: Three Pillars of UNGPs

Pillar 1	Pillar 2	Pillar 3
The state duty to protect human rights	The corporate responsibility to respect human rights	Access to remedy
Foundational principles (2)	Foundational principles (5)	Foundational principles (1)
Operational principles (3)	Operational principles (3)	Operational principles (3)
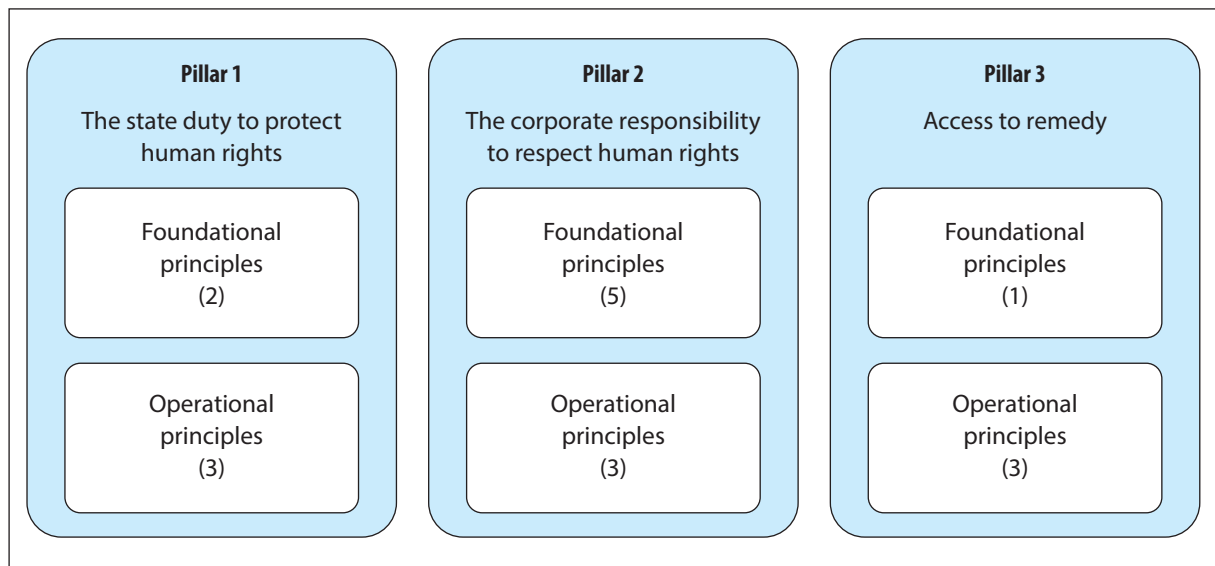
Source: Prepared by authors, 2021.

Under the second pillar on 'the corporate responsibility to respect human rights', the five foundational principles are: (a) business enterprises should respect human rights; this means that they must not infringe human rights of others and should address adverse human rights impacts with which they are involved; (b) the responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work; (c) the responsibility to respect human rights requires that business enterprises: (i) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and (ii) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts; (d) the responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors, and with the severity of the enterprise's adverse human rights impacts; (e) in order to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including (i) a policy commitment to meet their responsibility to respect human rights; (ii) a human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights; and (iii) processes to facilitate the remediation of any adverse human rights impacts they cause or to which they contribute. In this context, the three operational principles are (i) policy commitments, (ii) remedial measures and (iii) different context issues.

Under the third pillar viz., 'access to remedy', the foundational principle mentions that States must take appropriate steps as part of their duty to protect workers against business-related human rights abuse to ensure access of the affected to an effective remedy, through judicial, administrative, legislative or other appropriate means, as and when such abuses occur within their territory and/or jurisdiction. In order to achieve this, the operational principles should focus on state-based judicial mechanisms, state-based non-judicial grievance mechanisms and non-state-based grievance mechanisms.

2.2 Different Approaches for Assessing UNGPs in Practice

There are many analytical frameworks, approaches, methods to date, which are fashioned to quantify the level of implementation of UNGPs by the business concerns. These methodologies are sometimes explicit in accordance with UNGPs and sometimes implicitly aligns with the principles of UNGPs. Some of these frameworks include —

a. **Corporate Human Rights Benchmark (CHRB)** collaborates with investors and civil societies to create an open and public benchmark for businesses' human rights performance.[2]
b. **Global Network Initiative (GNI) Implementation Guideline** provides direction to the ICT sector for protecting human rights globally.[3]

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[2]https://www.corporatebenchmark.org/

[3]https://globalnetworkinitiative.org/implementation-guidelines/

c. **Global Reporting Initiative (GRI) Sustainability Reporting Guidelines** provide a general standard for companies to report on their sustainability impacts.[4]

d. **International Council on Mining and Metals (ICMM) Assurance and Validation** provides the members a framework to align their sustainability policies with Corporate Social Responsibility (CSR) reporting.[5]

e. **International Integrated Reporting (IR) Framework** promotes integrated thinking among mainstream businesses, resulting in efficient and productive capital allocation, which translates into financial stability and sustainable development.[6]

f. **Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance** gives companies suggestions to respect human rights and avoid conflict, which may arise due to their purchasing decision.[7]

g. **Voluntary Principles on Security and Human rights (VPSH) Initiative** is a multi-stakeholder approach to generate reporting on respecting human rights for companies involved in extracting, harvesting, developing natural resources or energy.[8]

h. **UNGPRF** provides a comprehensive guideline on how companies should accommodate their commitments to UNGPs in their public disclosures.[9]

Among these methodologies, this study compared the two most applicable frameworks in the context of Bangladesh's RMG sector, which is formatted according to the UNGPs. These two are CHRB and UNGPRF. The key features of these two frameworks are discussed in Table 1. The main difference between these two is that CHRB captures salient human rights issues in the targeted sector while UNGPRF assesses the company's maturity on human rights issues.

Table 1: Features of CHRB and UNGPFR

CHRB	UNGPRF
• CHRB was launched in 2013 as a multi-stakeholder initiative for benchmarking Businesses for their human rights practices	• The Human Rights Reporting and Assurance Framework Initiative (RAFI) was co-facilitated by Shift and Mazars in 2015
• Comprised six measurement themes, and each theme gets an appropriate weight. The first three are in accordance with UNGPs and add to the performance of company human rights practices and response to the severe allegation as well as transparency	• Divided into three aspects following UNGPs for Business: governance and respect for human rights, defining the focus of reporting and management of salient HR issues
• It is carried out with the engagement of companies, with no scope for unilateral scoring from the Business	• This has cross-reference with other methodologies, which can incorporate a comparison and supplementary result in this methodology
• It provides a sector-specific methodology to capture the salient human rights issues from that sector	• It assesses the maturity of companies reporting on human rights issues

Source: Prepared based on CHRB, 2020 and Shift, 2015a.

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[4]https://www.globalreporting.org/standards/

[5]https://www.icmm.com/assurance-and-validation/

[6]https://integratedreporting.org/resource/international-ir-framework/

[7]https://www.oecd.org/daf/inv/mne/mining.htm/

[8]https://www.voluntaryprinciples.org/the-initiative/

[9]https://www.ungpreporting.org/

2.3 Measuring the State of Progress in UNGPs: Adherence Index

UNGPs focuses on enterprise-level business and human rights compliance under three pillars, as mentioned earlier. These three pillars include, to repeat, (a) State's duty to protect human rights; (b) Corporate responsibility to respect human rights; and (c) Access to remedy for victims of business-related abuses.

These three pillars will be measured for RMG enterprises with a view to understanding their level of progress on human and labour rights. Shift (2019) suggested a "human and labour rights index" to assess enterprises' performance of human rights. Different countries have already applied this method both at intra-sectoral and cross-sectoral levels. One of the unique features of Shift's approach is its ability to measure the level of maturity of enterprises in complying with UNGPs' human rights issues. The present study terms it as – UNGPs Adherence Index.

Shift (2019) methodology examines the level of maturity of each enterprise in adherence to human rights under eight components (Figure 2). The components considered for assessment are (i) policy commitment; (ii) governance and embedding; (iii) prioritisation of risks and identification of salient human rights issues; (iv) stakeholders' engagement; (v) assessment of human rights risks; (vi) integration

Figure 2: Eight Components of the Index for Assessing Business and Human Rights
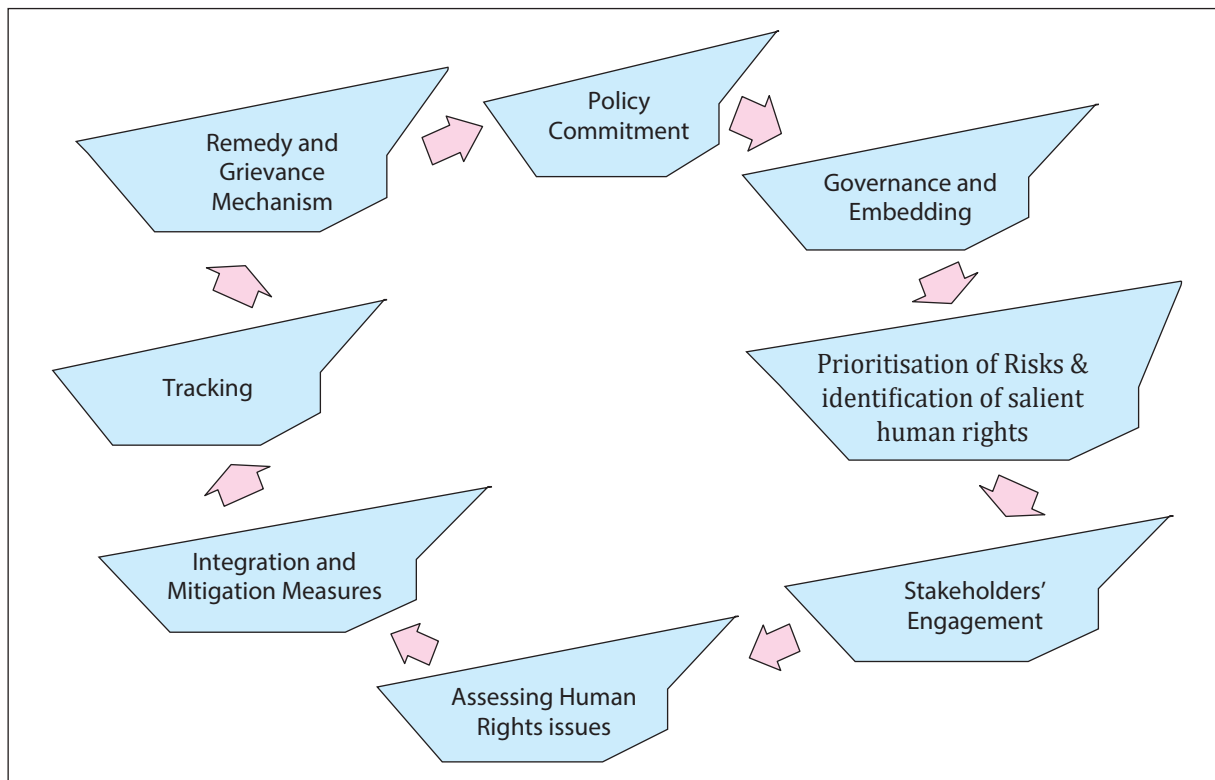
Source: Prepared by the authors based on UNGPs (2021).

and mitigation measures; (vii) tracking; and (viii) remedy grievance mechanism.[10] Figure 2 presents eight components considered for assessing business and human rights in an enterprise.

Besides, the methodology assesses a number of cross-cutting issues, which helps to understand the human rights compliance of an enterprise from a multi-dimensional point of view. Both of these two categories of components measure component-wise index values of human rights standards. The estimated value of specific and cross-cutting indices helps to measure the overall index value with regard to the maturity of assessed enterprises.

This study seeks to address the factors responsible for the strong and weak performance of enterprises with regard to their level of compliance with international human and labour rights standards. Such an exercise will help different stakeholders design strategies for intervention in order to improve enterprise-level maturity on social compliance.

3. Methodology of the Study

3.1 Level of Maturity of UNGPs Adherence Index

The study measures the state of reporting of business and human rights issues. Most importantly, the level of maturity of the RMG enterprises in reporting their adherence to UNGPs standards in terms of business and human rights. In order to measure the level of maturity, a six-point Likert scale is applied. Following the Erika and Michelle (2019) maturity analysis, for the business which has at least one document to show on the issues of human rights, this study will assess those reports in the following three levels: (a) components of the responsibility of respect for human rights (micro-level); (b) cross-cutting indicators of quality reporting; and (c) overall maturity of reporting (macro-level). Each of these components at the micro-level and overall macro level will be given a score of 0 to 5- where '0' means *negligible*, '1' equals *basic*, '2' indicates *improving*, '3' means *established*, '4' stands for *mature*, and lastly, '5' indicates as *industry-leading*.[11]

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[10]**Policy Commitment:** Business firm has the responsibility for respecting human rights, and they need to speak out their mind to fulfil this commitment. **Governance and Embedding:** Business enterprise must nominate key personnel responsible for the company's human rights issues. **Prioritisation of Risks and Identification of the salient Human Rights issues:** The company must disclose the salient human rights issues relevant to its business activities. Also, it should reveal how these issues were prioritised and if there is any particular focus on geography. Also, other problems, in addition to the salient ones, should be reported. **Stakeholders Engagement:** After the company recognises its most salient human rights issues, it should show how it engages with stakeholders relating to those particular human rights issues and why? How stakeholders influenced the company's understanding of each issue and how these issues are discussed and managed as a matte of regularity should also be maintained in the report. **Assessing Human Rights Risks:** Companies need to provide information on how they assess the impact of ther programs and operation on human rights issues. Is there any procedure in place with comprehensive examples of how they work in practice? **Integration and Mitigation Measures:** In this reporting framework, companies should show how the findings from previous components have affected the companies' decision making, i.e., how companies try to mitigate those issues. They must report their actions with a general description and insightful examples of mitigation with proper reasoning; how stakeholders are engaged and the outcome thereof. **Tracking:** Companies must track their progress on human rights issues and provide detailed data and narratives on the company's progress in endorsing human rights. Also, companies need to show how they are using this data to improve their actions. **Remedy and Grievance Mechanisms:** Companies need to give information on the means of receiving complaints relevant to human rights violation. Moreover, how those concerns are addressed and what measures are taken to prevent repetition of those issues should also be reported.

[11]In the case of cross-cutting level, this study will give 0 to 4 scale and remove the leading scale.

Figure 3: Distribution of Sample Enterprises under Different Categories

		Small	326	54%
	Size-wise	Medium	231	38%
		Large	46	8%
		Dhaka	220	36%
Sample Survey	Location-wise	Gazipur	199	33%
		Narayangonj	114	19%
		Chittagong	70	12%
		BGMEA	325	54%
	Membership-wise	BKMEA	121	20%
		Both	48	8%
		Non-member	109	18%
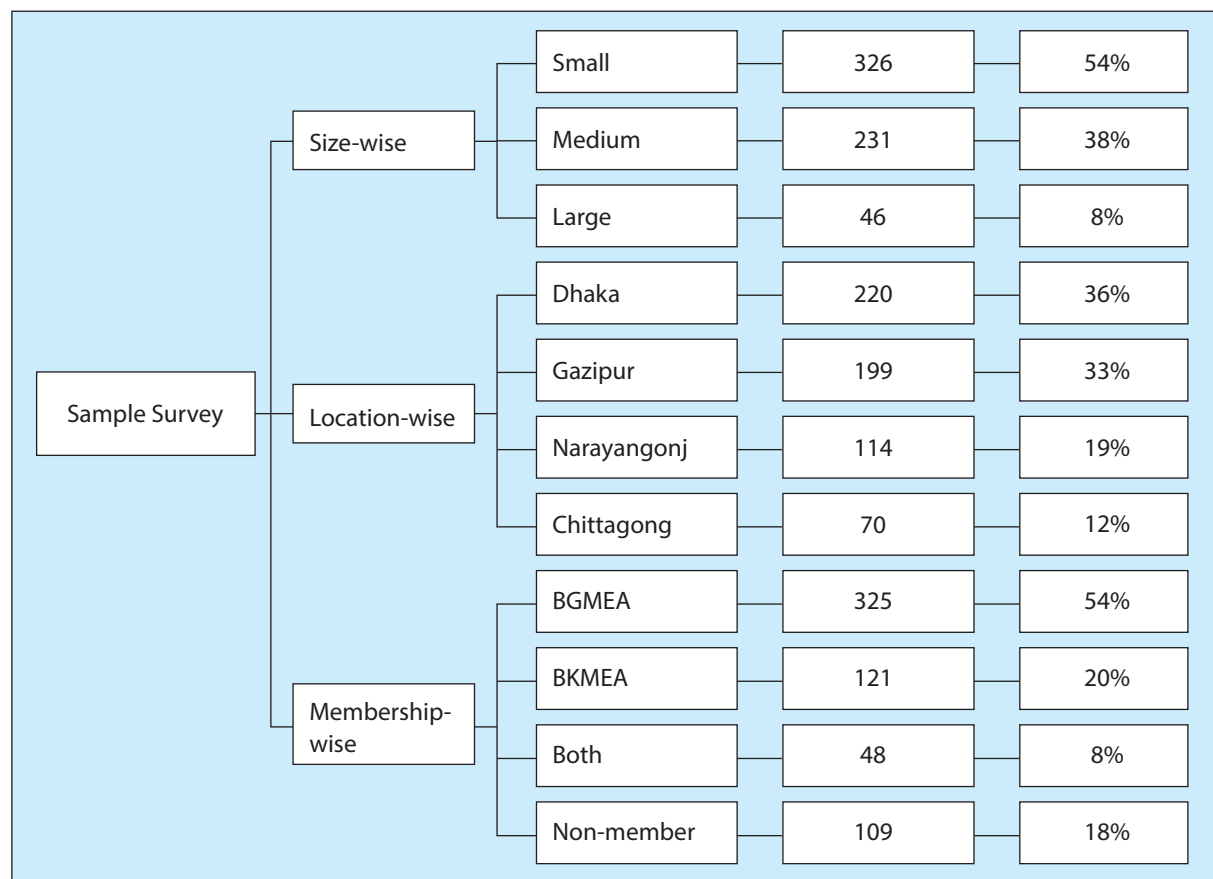
Source: Prepared by the authors (2021).

3.2 Primary Survey on RMG Enterprises and RMG Workers

A nationally representative enterprise-level survey has been undertaken with a sample of 603 enterprises (Figure 3). The samples are selected based on the criteria of size, location and membership of private associations. Given the strong association of business practices and human rights with size, location and association-related issues, samples have been stratified based on the above-mentioned three indicators. As there is no existing comprehensive secondary database on the human rights condition in the RMG sector of Bangladesh, this survey was necessary to find out the required information to answer research questions. Considering the national population of RMG enterprises (3297 Enterprises), these samples covered 54 per cent of small enterprises (with a worker size of less than 500), 38 per cent of medium-size enterprises (workers between 500-2500) and 8 per cent of large enterprises (workers above 2500). Sample enterprises have been selected from four major clusters – Dhaka, Gazipur, Narayangonj and Chattogram (Table 2). Besides, factories with the membership of BGMEA and BKMEA have been considered in selecting the samples (Figure 3).

The study conducted a number of KIIs covering key stakeholders, including representatives of trade bodies (BGMEA, BKMEA), CBA/trade unions/workers organisations, brands/buyers and the government. Such discussion focuses on major constraints for RMG enterprises' adherence to UNGPs and other cross-cutting issues.

Before the survey, an expert group meeting was conducted on the paper's proposal with the representatives of the Centre for Policy Dialogue (CPD) and Christian Aid. Following the expert group meeting on 7 March, 2021, KIIs were conducted, and a draft questionnaire was prepared and subsequently reviewed by the experts. KIIs involved two factory owners, two government officials, two workers representatives and one industry expert. On 23 May, 2021, a training programme for the enumerators on the questionnaire got underway. After three days of training for 40 enumerators, the survey commenced on 27 May, 2021 in 4 different districts of Bangladesh. Finally, the survey ended on 8 June, 2021 with 603 responses from factory administrators and 605 responses from workers. After that, data was verified and rechecked for any technical error.

3.3 Research Ethics Followed for Conducting the Study

The study had followed standard research ethics guidelines during the course of pursuing different research-related activities. In this case, the study team took into account the recommendations of the report titled 'Doing Research Ethically: Principles and Practices for International Development Practitioners and Evaluators'.[12] During the design phase of the study, the study had conducted a literature review to appreciate the idea of UNGPs, how the study would link it with industrial activities, who would be the target groups for this study, which evidence would be relevant to measure the level of progress in view of the UNGPs, data availability for pursuing the study, setting the objectives, identifying the target audience of the findings of the study, which methods to be followed and what sampling frame to be used. In case of the ethical aspect of the research, the study identified the appropriate respondents of the study, assessed the risks, particularly for children and vulnerable groups, the inclusion of sensitive topics, ensuring anonymity of respondents. In case of data collection phase, the study considered the following issues.

4. Basic Features of Surveyed Enterprises, Management and Workers

4.1 Location of Surveyed Enterprises

The surveyed factories are located in four major RMG clusters: Dhaka, Gazipur, Narayangonj and Chattogram. However, factories in Dhaka and Gazipur are relatively dispersedly located partly because of a larger number of sample factories. In comparison, sample factories in Narayangonj and Chattogram are concentrated in specific areas partly because of a smaller number of sample factories.

4.2 Features of Surveyed Enterprises

4.2.1 Size of Enterprises

Surveyed factories have been categorised into three groups which include (a) small factories, each employing not more than 500 workers, (b) medium sizes factories, each employing between 501 and 2500 workers, and (c) large size factories, each employing over 2500 workers.[13] Figure 4 presents the distribution of sample enterprises. The distribution of factories and the average number of workers

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[12]https://learn.tearfund.org/en/resources/tools-and-guides/doing-research-ethically

[13]The classification of enterprises follows Moazzem (2018). Since RMG enterprises are relatively large in size, the classification of enterprises has considered higher than the national average of size of enterprises (Industrial Policy 2016).

Figure 4: Enterprise Survey District-wise Location
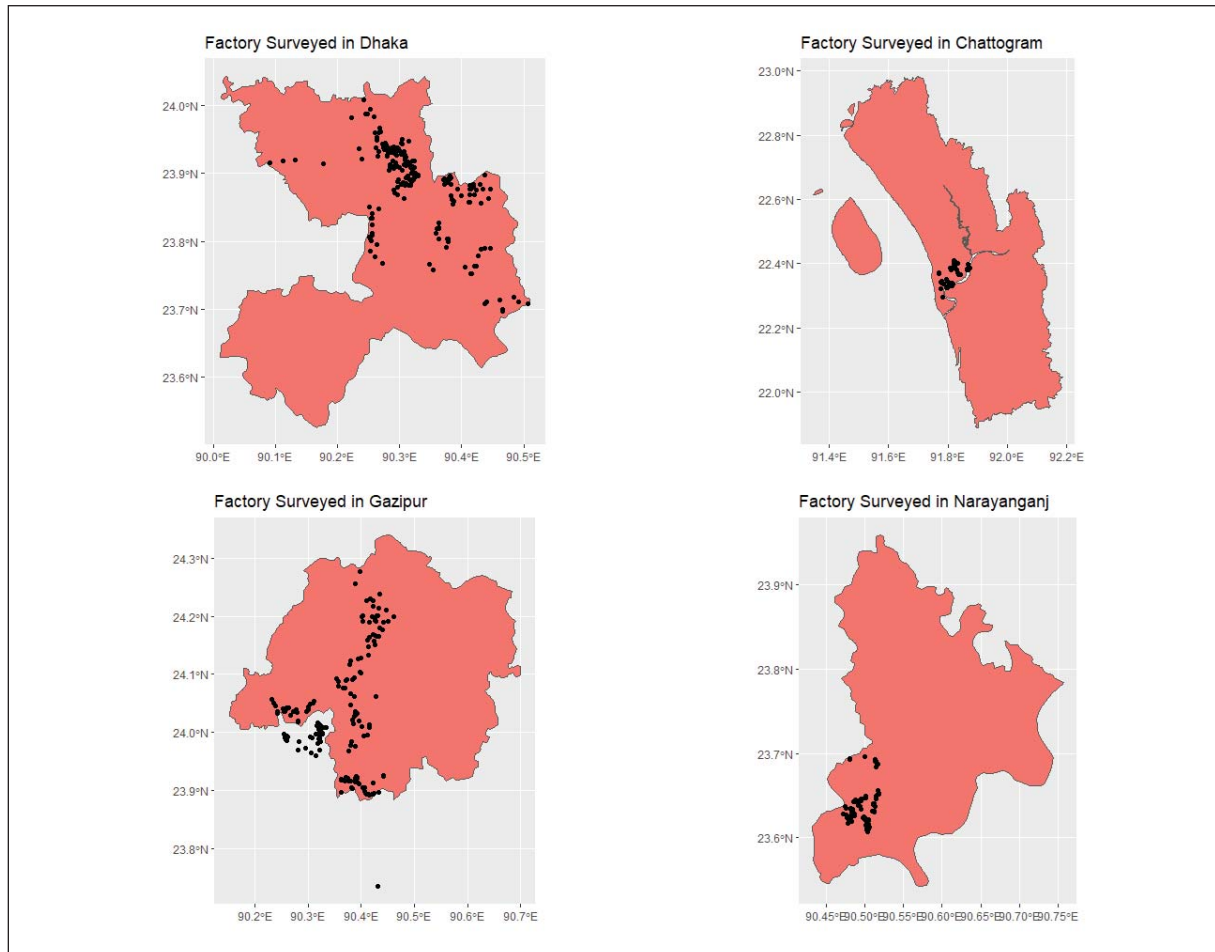
working in those factories are inversely related. While large enterprises are relatively small in share (7.6 per cent), they employ the second-highest share of employment (36.3 per cent). On the other hand, the medium-sized enterprises have a share of 38.3 per cent, with the highest share of employment of 51.2 per cent. Small scale enterprises are the largest in the total number of enterprises (54.1 per cent in total enterprises) but employ the smallest share of RMG workers (12.5 per cent in total workers). It is important to examine how different sized enterprises are focusing on human rights and labour rights-related issues vis-à-vis the UNGPs.

Given the inverse nature of the relationship between the number of enterprises and the number of workers, progress on adherence to UNGPs in large and medium scale enterprises would cover more workers. In contrast, progress in small scale enterprises would cover more enterprises.

Figure 5: Size of Factory (District-wise)
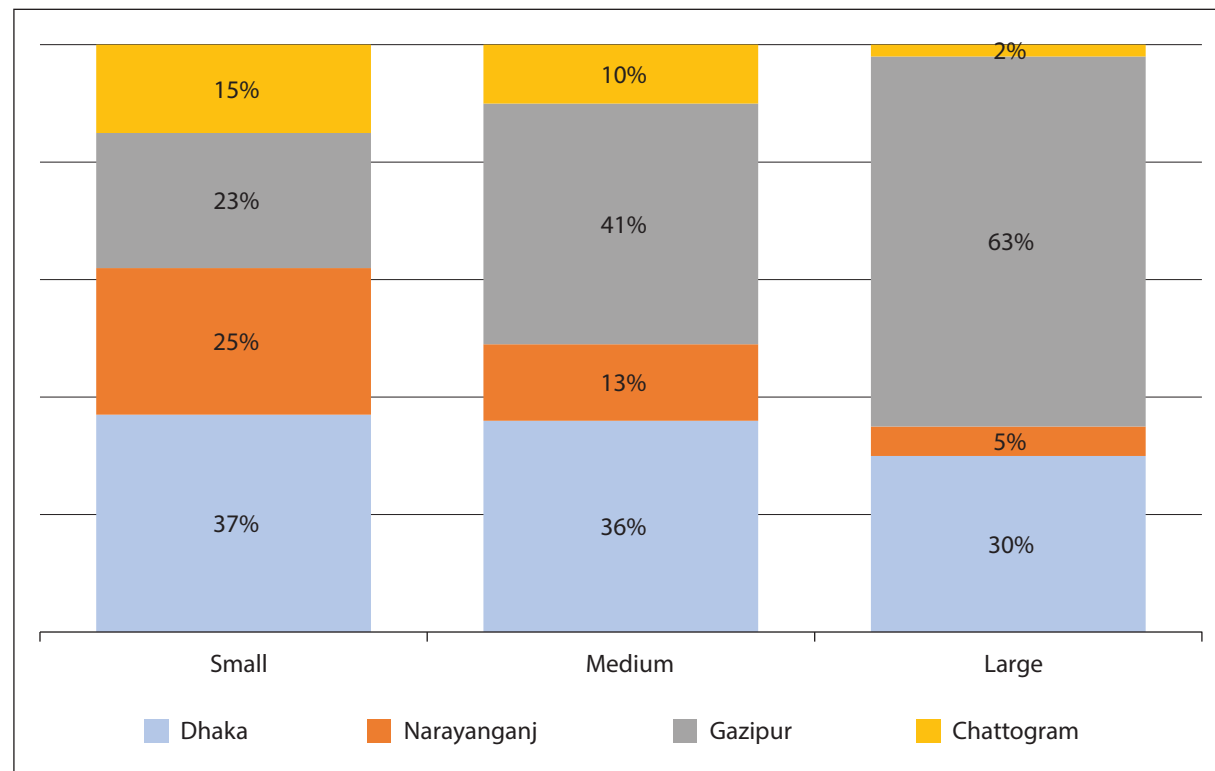
Source: CPD-Christian Aid Survey, 2021.

4.2.2 Membership

The surveyed enterprises include both BGMEA- and BKMEA-affiliate members as well as the non-member enterprises (Table 2). Of the 603 surveyed enterprises, 53.9 per cent are BGMEA members, 20.07 per cent belong to BKMEA, and 7.96 per cent are members of both BGMEA and BKMEA. On the other hand, a total of 109 enterprises which equals 18.08 per cent of the total surveyed factories, are non-members. It is expected that factories that are members of the associations are likely to comply with human and labour rights issues better than non-member enterprises. The study investigates whether adherence to UNGPs has got specific linkages with the membership of factories; in other

Table 2: Factories' Membership Status (Location-wise)

Location	Membership of the Factories (in Percentage)				Total
	Both	**Non-member**	**Only BGMEA**	**Only BKMEA**	
Dhaka (N=220)	4.55	13.64	65.45	16.36	100.00
Narayanganj (N=114)	19.30	30.70	7.02	42.98	100.00
Gazipur (N=199)	5.03	12.56	68.34	14.07	100.00
Chattogram (N=70)	8.57	27.14	52.86	11.43	100.00
Total (N=603)	7.96	18.08	53.90	20.07	100.00

Source: CPD-Christian Aid Survey, 2021.

words, formalisation of factories with two major associations, BGMEA and BKMEA, would contribute to improvement in UNGPs related practices of factories.

4.2.3 Location-wise Distribution of Enterprises

The enterprise survey has been carried out in four districts: Dhaka, Narayanganj, Gazipur and Chattogram. In terms of spatial distribution, Dhaka and Gazipur are the two important locations for RMG factories because of their urban competitiveness in terms of better access to labour, infrastructure and utilities, banking facilities, administrative issues in government offices and other facilities. Different categories of factories, such as small, medium and large-scale enterprises, are located dispersedly in four major industrial clusters. Large-scale enterprises are the highest in number in Gazipur (63 per cent), which are usually land-intensive and vertically linked (Figure 5) above. On the other hand, medium-sized factories are higher in share in Gazipur (41 per cent) and Dhaka (36 per cent). Small scale enterprises are dispersed in all four clusters though the highest number of factories are located in Dhaka (37 per cent), followed by Narayanganj (25 per cent). The locational dimension prevails in case of membership of factories. Knitwear factories, which are members of BKMEA, are located more in Narayanganj, while woven wear factories, which are members of BGMEA, are located more in Dhaka, Gazipur and Chattogram. Given the influences of the size of enterprises on the overall performance of enterprises' compliances (Moazzem, 2018), it is likely that human and labour rights issues would have size-wise implications.

4.2.4 Ownership of Factories

Unlike many Asian Apparel Exporting Countries (Vietnam, Cambodia, Myanmar), Bangladesh's RMG sector is dominated by domestic apparel manufacturers: only 0.83 per cent of the sample enterprises are FDI-led (Foreign Direct Investment) enterprises located mainly in EPZ areas. The majority of local enterprises are family-based private limited companies (64.3 per cent), indicating the state of Corporate issue in RMG enterprises (Table 3). Despite the rise in corporate posture or conduct in the RMG sector, a large section of enterprises is still out of this process; as many as 28 per cent of enterprises are operated under sole-proprietorship, which are members of BGMEA and BKMEA.

Table 3: Ownership Nature of the Factories (Size-wise)

Size	Ownership Nature of the Factories (in Percentage)						
	Publicly listed Companies	Joint Venture	Private Limited	Sole Proprietorship	FDI	Partnership	Others
Large (N= 46)	15.22	0.00	69.57	17.39	0.00	4.35	4.35
Medium (N= 231)	8.23	1.30	77.06	13.85	1.30	6.49	2.16
Small (N= 326)	0.92	1.23	54.60	39.57	0.61	4.29	0.92
Total (N=603)	4.81	1.16	64.34	28.03	0.83	5.14	1.66

Source: CPD-Christian Aid Survey, 2021.

In other words, BGMEA and BKMEA ought to encourage enterprises towards upgradation from the sole proprietorship-based companies into private/public limited companies. Besides, publicly listed companies are also insignificant in number; only 4.8 per cent of total listed companies are part of the

Stock Exchange. Corporate conduct in the RMG sector of Bangladesh did not develop under the structure of public capital, through enlistment as companies in the DSE/CSE (Dhaka Stock Exchange/Chattogram Stock Exchange). Despite having the rise of private limited companies, corporate practices are still in a poor state. Often these companies are operated by a single-family and, more specifically, operated by a single male member of the family. Hence, the distinction between the board and the management is largely missing. The Board of the RMG enterprises comprises nine members, of which two are from the same family. More importantly, the presence of female board members is negligible: on average female board member is just one (Table 4). Out of these 442 factories reporting board-related information, 213 factories do not have female board members. Such a skewed structure of a male-dominated board would be a constraint in developing a gender-sensitive workplace in Bangladesh's RMG sector (Moazzem, 2018). Furthermore, very few enterprises have the position of independent directors in the Board, which further constrain factories to accommodate independent views with regard to human and labour rights issues in the workplace.

Table 4: Composition of the Board of Sample Enterprises

Issues	Sample Size (N)	Mean
Board of Members	442	8.5
Board of Members from the same family	442	2.2
Female Members on the Board	442	0.8

Source: CPD-Christian Aid Survey, 2021.

It is important to note that a large part of factories is sister concerns of large groups of companies; as high as 46.3 per cent of factories are members of different groups. Group membership is high in the case of factories located in Dhaka (65.5 per cent) and Gazipur (57.02 per cent), and it is lower in case of factories located in Narayangonj (57.0 per cent), which are largely small-scale enterprises (Table 5). Factories that are sister concerns of different groups may be better positioned in terms of adherence with the UNGPs, perhaps due to better networking with brands/buyers through the mother company and better scope for financial management owing to cross-subsidisation with the mother company. It is important to investigate how sister concerns of the group adhere to the UNGPs.

Table 5: Ownership Nature of the Factories (Location-wise)

Location	Ownership Nature of the Factories						
	Publicly listed/ Public Limited	Joint Venture	Private Limited	Sole Proprietorship	FDI	Partnership	Others
Dhaka (N=220)	5.45	1.82	65.45	27.27	0.45	6.82	2.27
Narayanganj(N=114)	1.75	0.00	57.02	41.23	0.00	1.75	0.00
Gazipur(N=199)	6.03	1.51	66.33	22.11	2.01	6.03	2.51
Chattogram(N=70)	4.29	0.00	67.14	25.71	0.00	2.86	0.00
Total(N=603)	4.81	1.16	64.34	28.03	0.83	5.14	1.66

Source: CPD-Christian Aid Survey, 2021.

4.2.5 Turnover during 2019 and 2020

Majority of factories have been experiencing a difficult time in terms of financial performance during the pandemic period. Table 6 provides the summary of turnover for 2019 and 2020. Factories across

different categories have experienced a decline in their annual turnover during 2020 due to the COVID-19 pandemic: the average fall in annual turnover was 14.30 per cent. The adversity was rather high in the case of small and medium scale enterprises as their turnover declined by 32.20 per cent and 14.30 per cent, respectively. In comparison, the turnover for large scale enterprises has declined relatively less, 4.1 per cent, during 2020 compared to 2019. Such huge differences between different categories of enterprises in their financial position would have disproportionately adverse effects in maintaining the labour and human rights at present and might have similar effects in future investment on the improvement of human and labour rights issues in factories.

On the other hand, most suppliers maintain their core business relations with a limited number of brands/buyers. According to Table 6, most factories are dependent on one or two major brands/buyers for their export who are mainly based in Europe and the USA/Canada, as high as 59 per cent of products supplied to the topmost buyers. On average, a factory exports 43 per cent of its products to Europe and a little over 22 per cent to the USA. Hence, there is scope for brands and buyers based in Europe and partly those of the USA to work with their suppliers to adhere to the UNGPs through their CoC. The role of brands/buyers could be identified in adhering to international accords of human and labour rights issues.

Table 6: Sample Enterprises' Changes in Turnover During 2019 and 2020 and Major Export Destinations

Statistic	Mean	Standard Deviation
Share of top most buyer 2019 (%)	59.1	22.6
Overall changes in annual turnover between 2019 and 2020 (%)	-14.3	-
Changes in small Enterprises (%)	-32.2	-
Changes in medium Enterprises (%)	-14.3	-
Changes in large enterprises (%)	-4.1	-
Share of export to USA 2019 (%)	22.2	28.9
Share of export to Europe 2019 (%)	42.9	36.1
Share of export to the rest of the World 2019 (%)	13.0	22.1
Share of export through subcontract 2019 (%)	14.1	30.9
Share of domestic market production (%)	4.6	17.6

Source: CPD-Christian Aid Survey, 2021.

4.2.6 Level of Public Disclosure

Public disclosure of company-level practices is one of the first steps to learn and appreciate the performance of human and labour rights issues and thereby the readiness of the factory's adherence with UNGPs. Overall, the state of public disclosure of company-specific information appears to be poor: about 48.7 per cent of factories claimed to maintain official websites. In contrast, another 21.4 per cent of factories claimed to have websites of their groups (Table 7). Most important, as high as 30 per cent of factories do not maintain any official website. Large scale enterprises are claimed to maintain websites by the highest share: a little over 97 per cent of total large-scale factories, followed by medium scale enterprises - (93.1 per cent) and small-scale enterprises - (50.0 per cent). BGMEA member factories have claimed to be in a better position compared to those of the BKMEA member factories (Table 8).

Table 7: Different-sized Factories with a Website

Size	Maintaining a Website (in Percentage)			
	For Factory	For Group of Companies	Both	No
Large (N= 46)	28.26	34.78	34.78	2.17
Medium (N= 231)	40.69	33.33	19.05	6.93
Small (N= 326)	37.42	11.04	1.53	50.00
Total (N=603)	37.98	21.39	10.78	29.85

Source: CPD-Christian Aid Survey, 2021.

Table 8: Factories with a Website (Member-wise)

Part of Member	Maintaining a Website (in Percentage)			
	For Factory	For Group	Both	No
Both, (N=48)	37.50	33.33	12.50	16.67
Non-member (N=109)	19.27	6.42	2.75	71.56
Only BGMEA, (N=325)	39.08	27.69	15.38	17.85
Only BKMEA, (N=121)	52.07	13.22	4.96	29.75
Total, (N=603)	37.98	21.39	10.78	29.85

Source: CPD-Christian Aid Survey, 2021.

The study team has examined the claim made by the factory management on the availability of the websites they developed and maintained (Table 9). Analysis of 60 factories that claimed to have websites reveals that many factory websites are either non-existent or non-functional. It is usually presumed that factories maintain websites to strengthen their web-based linkages/networking with different market players, including brands and buyers. However, a close examination reveals that factories with websites do not regularly update their respective websites and do not provide the latest factory-level information there. Such poor scenario of company websites with minimal importance to ensure institutional accountability reflects companies' lacking in this respect or limited interest in public disclosure on their profile and performance relating to human and labour rights issues.

Table 9: Website Information per Selected Companies Claim

	Number of Factories	% of Factories (Out of Searched Factories)
Factories maintaining active website (no.)	27.00	45.76
Factories with non-functional website (no.)	3.00	5.08
Factories with inactive websites (no.)	29.00	49.15
Information Available with the Factories Maintaining Active Websites (No. of Factories)		
	Number of Factories	% of Factories (Out of Searched Factories)
Human Rights Policy Commitment	11.00	40.74
Governance and embedding	5.00	18.52
Prioritisation of Risks and Identification	4.00	14.81
Stakeholder engagement	2.00	7.41

(Table 9 contd.)

(Table 9 contd.)

	Number of Factories	% of Factories (Out of Searched Factories)
Assessing Human Rights Risks	4.00	14.81
Integration and mitigation measures	0.00	0.00
Tracking	0.00	0.00
Remedy and Grievance Mechanisms	1.00	3.70

Source: Based on web-search of selected sample factories, 2021.

4.3 Features of Management of the Surveyed Enterprises

Factory-level management is responsible for ensuring workers' human aspects and workers' rights issues. On average, each RMG factory has 30 management professionals, of which 85.5 per cent are male, and only 14.5 per cent of management professionals are female (Table10) . Poor female representation in management-related activities is a major lacuna in gender-sensitive aspects in respect of factories' human and labour rights. Usually, General Managers (GM) are the operational heads of the factories; however, owners are found to manage the operation in proprietorship-based factories. About 67 per cent of the factories has GM, and 77 per cent of factories has Human Resource (HR) Heads. Management positions are mostly filled-up by local professionals. However, foreign professionals are increasingly working in different sections of factories; about 7 per cent of factories have foreign professionals working in different sections. Foreign staff are mainly found in operation management, production designing, industrial relations and merchandising (Table 11). Despite the availability of fresh graduates in the country, the companies increasingly prefer hiring foreign professionals; this indicates that local graduates are not as qualified as per the expectation of the factory owners.

Table 10: Summary of Management Staff

Statistics	Sample Size (N)	Mean	Standard Deviation
Male Managerial Staff	603.00	25.60	48.0
Female Managerial Staff	603.00	4.30	12.30

Source: CPD-Christian Aid Survey, 2021.

Table 11: Departments Engaging Foreign Professionals

Departments	% (in case of 42 Factories)
Production Designing	50.00
Merchandising/ Supply Chain Management	26.19
Industrial Relations	26.19
Operational Management	45.24
Industrial Engineering	16.67
Others (please specify)	11.90

Source: CPD-Christian Aid Survey, 2021.

Given the lead role played by the GMs, his/her qualification and experience are highly important in ensuring factory level adherence with human and labour rights issues compatible with UNGPs.

Figure 6: Educational Level of GM and HR Head in the Factory
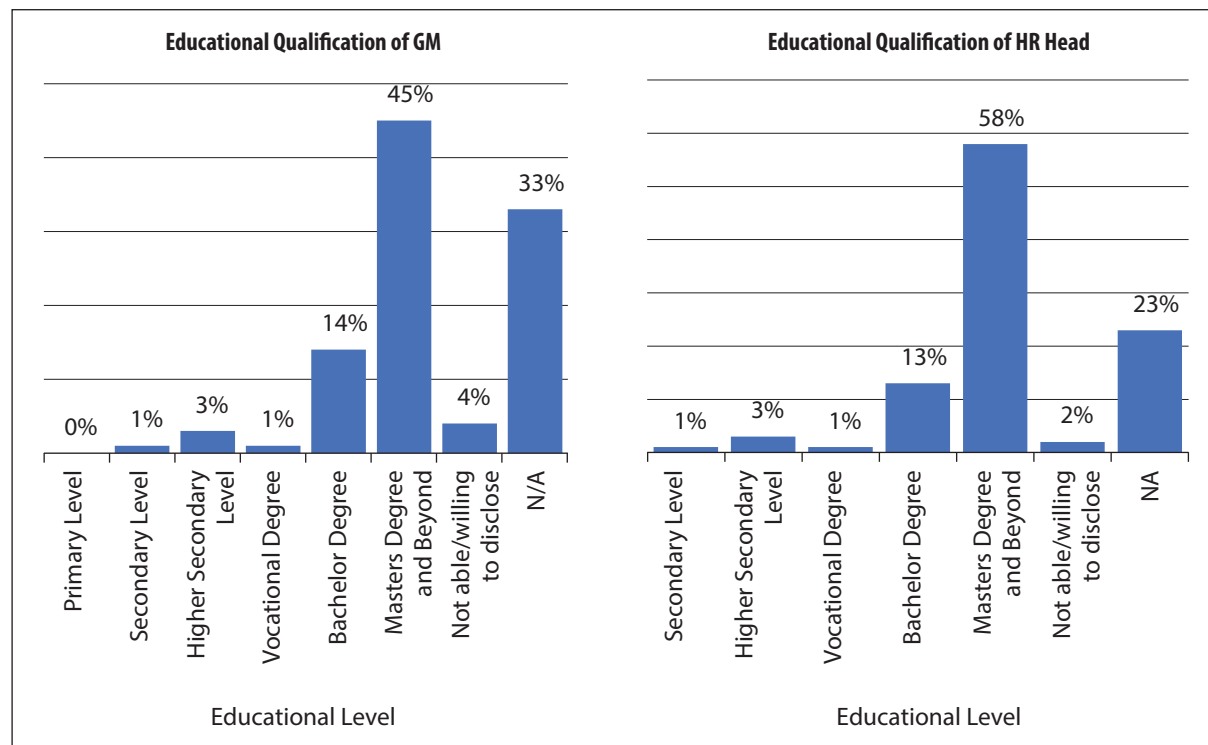
Source: CPD-Christian Aid Survey, 2021.

Figure 6 shows the survey findings on different levels of academic qualification that GM and HR Heads possess. It is found that 87 per cent of GMs is graduate or masters degree holders or above. In the case of HR Heads, 92 per cent have an education level of bachelors, masters or above. In other words, as high as 13 per cent of the GMs and 8 per cent of the HR Heads did not complete the graduation level education. Lack of standardisation of academic qualification for key management positions in the RMG factories has created opportunities for professionals entering important management positions without having the basic/ required educational qualification.

In order to better manage the factory, different professional training is considered important, which the management professionals usually take over the period of their work. Management Staff take those training either at their own arrangement or through an in-house arrangement by the factories. About 64 per cent of the GMs has received some kind of special training, while 61 per cent of them received in-house managerial training. Table 12 lists the training the GMs of the sample factories received on various topics/issues. In case of professional training outside factories, the majority of GMs took training on *business communication and professional etiquette managerial skills* (65.30 per cent), *cost minimisation* (52.30 per cent), *compliance management* (49.24 per cent) and *total quality management* (48.47 per cent). In addition, a considerable number of Managers has specialised training on *human and labour rights* issues which include training on *improving efficiency & productivity* (57.57 per cent), *quality management* (59.73 per cent), *environment, health & safety* (55.68 per cent), and *Bangladesh Labour Law* (43.24 per cent). Besides, the Managers received professional training on *crisis management*, *problem-solving* and *decision-making*, which are supposed to contribute to better management of factories. In-house training is mainly provided for micro-management of factories: the most important ones in this

Table 12: Training of GM and In-house Training for Management Professionals

	Option	Percentage of Responses		Option	Percentage of
Training for GM	Business Communication, Organisation Behavior and Professional Etiquette	65.27	In house Training for Management Professionals	Improving Efficiency and Productivity	57.57
	Essential Managerial Skills	36.26		Floor Etiquette/ Behavior/ Communication	50.00
	Cost Minimisation	52.29		Quality Management	59.73
	Bangladesh Labor Law	53.05		Environment, Health and Safety	55.68
	Compliance Management	49.24		Fire Fighting	79.73
	Crisis Management	40.84		Compliance Management	50.27
	Total Quality Management	48.47		Motivating Workers / Supervisors	38.65
	Leadership and Monitoring	44.66		Bangladesh Labor Law	43.24
	Corporate Social Responsibility (CSR)	22.90		Managerial Skill Development	32.70
	Problem Solving and Decision Making	32.82		Others (please specify)	0.81
	Others (specify)	1.91			

Source: CPD-Christian Aid Survey, 2021.

respect are *improving efficiency and productivity*, *quality management*, *communication and managerial skill development*, etc. Training on a number of labour and human rights issues has been provided internally, including *floor etiquette*, *fire-fighting*, *compliance management*, *worker motivation*, and the *Bangladesh Labour Act (BLA)*. However, the level of training intensity is widely varied between small-, medium- and large-scale enterprises and hence, the quality of management is likely to differ amongst these factories (Table 13 and Table 14).

Table 13: Training of GM (Factory Size-wise)

Types of Training	Size of the Factory (in Percentage)		
	Large (N=46)	Medium (N=231)	Small (N=326)
Business Communication, Organisation Behavior and Professional Etiquette	54.35	42.86	14.42
Essential Managerial Skills	34.78	20.78	9.51
Cost Minimisation	50.00	33.33	11.35
Bangladesh Labor Law	39.13	35.93	11.66
Compliance Management	50.00	31.17	10.43
Crisis Management	41.30	26.84	7.98
Total Quality Management	45.65	28.57	12.27
Leadership and Monitoring	45.65	29.00	8.90
Corporate Social Responsibility	32.61	14.72	3.37
Problem Solving and Decision Making	17.39	25.11	6.13
Others (specify)	4.35	0.00	0.92

Source: CPD-Christian Aid Survey, 2021.

Table 14: In-house Training (Factory Size-wise)

Types of Training	Size of the Factory (in Percentage)		
	Large (N=46)	Medium (N=231)	Small (N=326)
Improving Efficiency and Productivity	73.91	47.62	21.17
Floor Etiquette, Behavior and Communication	60.87	40.69	19.33
Quality Management	78.26	48.48	22.39
Environment, Health and Safety	58.70	45.45	22.70
Fire Fighting	78.26	63.64	34.36
Compliance Management	56.52	45.89	16.56
Motivating Workers / Supervisors	56.52	29.44	15.03
Bangladesh Labor Law	50.00	35.93	16.56
Managerial Skill Development	52.17	28.14	9.82
Others (please specify)	4.35	0.00	0.31

Source: CPD-Christian Aid Survey, 2021.

Internal exchanges and communication within management professionals are essential tools and effective ways towards the better functioning of the factories. This study observed that more than 36 to nearly 70 per cent of the factories (small-medium-large) organise daily meetings, and more than 30 to nearly 52 per cent of factories meet weekly for managerial decisions; whereas around 8 per cent, medium-size factories and barely 18 per cent of small-size factories arrange a monthly meeting and no monthly meeting in case of the large ones. In case of meeting with the Board of Directors, a daily meeting takes place in case of barely 18 per cent small-size factories and further below in case of large and medium factories; the scenario is however far better about the weekly meeting: 50 per cent, nearly 46 per cent and more than 42 per cent of large, medium and small factory management respectively meet with the Board of Directors once a week; and status of monthly managerial meeting with the Directors is also good enough: nearly 35 per cent large factories, nearly 43 per cent medium factories and 37 per cent small factories are relevant here (Table 15). Needless to note, the frequency of management meetings varies between different categories of enterprises: small, medium and large-scale.

Table 15: Interval for Management and Board of Directors Meeting (Factory Size-wise)

Managerial Meeting Interval						
	Daily	Weekly	Monthly	Yearly	Never	Total
Large	69.57	30.43	0.00	0.00	0.00	100.00
Medium	39.83	51.95	8.23	0.00	0.00	100.00
Small	36.50	44.79	18.1	0.31	0.31	100.00
Managerial Meeting with Board of Directors						
Large	15.22	50.00	34.78	0.00	0.00	100.00
Medium	9.52	45.89	42.86	1.3	0.43	100.00
Small	17.79	42.64	37.12	1.84	0.61	100.00

Source: CPD-Christian Aid Survey, 2021.

4.4 Features of the Structure of Employment

In general, RMG factories have been getting bigger over the years (Moazzem, 2018). However, the factory size has reduced of late during the pandemic due to operational decline in most of the factories. The average number of workers working in the RMG factories is 879, which is less than the average employment size in factories during the pre-Covid period (973 in 2018 according to CPD, 2018). On the other hand, the growth of enterprises is rather high in large and medium scale factories: large enterprises are 14.6 times bigger than small enterprises, and medium enterprises are 4.1 times bigger than small enterprises.

The gender aspect of production workers has been changing over the years in the wake of the decline in the female share of employment in the factories (ACD, 2018). The male-female ratio of factory workers is 41.5:58.5, which was 60.80 for female in 2018 indicating a gradual deceleration of female employment in the garment factories. In fact, female employment has been decelerating more in large scale enterprises (57.1 per cent) compared to that in the medium (58.4 per cent) and small enterprises (61.5 per cent). Factors like 'better technological upgrading' may influence 'changing gender composition' in the enterprises, particularly in large scale enterprises. New technologies are often labour-curtailing, particularly those of less-skilled ones involving mostly female workers. Therefore, adopting and applying high technology in factory operation is likely to replace a section of female workers from the lower grades.

Gender distribution is diverse, or one says haphazard, in terms of other categories of enterprises (Tables 16 and 17). For example, female workers are relatively high in non-association member factories (60.4 per cent) compared to that of the factories affiliated with BGMEA and BKMEA (58.6 per cent). Similarly, the highest share of female employment is observed in factories located in Chattogram (73.2 per cent), which are mainly woven factories, while the lowest share of female employment is found in the factories located in Narayangonj (50.3 per cent), which are mainly knit-wear factories.

Table 16: Average Number of Workers based on Gender (Size-wise)

Factory Size	Gender of Workers		Total
	Male	Female	
Large	1810 (42.90%)	2405 (57.10%)	4215 (100.00)
Medium	493 (41.60%)	693 (58.40%)	1186 (100.00)
Small	111 (38.50%)	177 (61.50%)	288 (100.00)
Total	364 (41.50%)	515 (58.50%)	879 (100.00)

Source: CPD-Christian Aid Survey, 2021.

In case of non-production categories of employment in RMG factories, male staff overwhelmingly dominates over female staff. On average, a factory has 104 non-production staff, of which 86 staff are male (82.6 per cent), and only 18 staff (17.4 per cent) are female.

Table 17: Average Number of Workers (Size, Membership and Location)

Gender	Size			Membership		Location			
	Large	Medium	Small	Member	Non-Member	Dhaka	N'Ganj	Gazipur	Chattogram
Male	1729	494	79	1729	93	311	252	569	130
Female	2453	681	124	2453	142	469	255	769	357
Total	4183	1175	203	4183	235	780	507	1338	488
In column %									
Male	41.3	42.0	38.9	41.3	39.6	39.9	49.7	42.5	26.6
Female	58.6	58.0	61.1	58.6	60.4	60.1	50.3	57.5	73.2
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: CPD-Christian Aid Survey, 2021.

The factories are operated by engaging 'regular workers' (Table 18). However, the use of 'contractual and casual workers' is likely to rise in all factories. Even some factories already hire a large number of contractual and casual workers. It is to be noted that regular workers are entitled to receive financial and non-financial benefits and entitlements that are not applicable for workers recruited on a contractual and casual basis. Even some factories have reported recruiting 'child labour' aged below 14 years and 'juvenile workers' (aged between 14-18 years). Under Bangladesh law, juvenile workers aged 14 to 18 years can work legally with some restrictions.

Table 18: Summary Statistics of Production Workers

Issues	Sample Size (N)	Mean
Total Regular Workers	603.0	878.8
Contractual Workers	603.0	5.4
Casual Workers	603.0	3.0

Source: CPD-Christian Aid Survey, 2021.

5. Human and Labour Rights: Practice at the Enterprise Levels

Before discussing the prevailing state of UNGPs in the RMG sector of Bangladesh, it is important to examine existing practices of human and labour rights issues at the enterprise level. The analysis has been carried out based on the data collected from sample surveys involving both enterprises and workers. A total of fourteen (14) *different human and labour rights* issues have been identified, and their practice has been examined. These indicators include (a) no use of child labour; (b) no workplace harassment; (c) ensuring living wages; (d) providing maternity benefit; (e) providing child-care facility/benefits; (f) no sexual harassment; (g) opportunities for collective bargaining; (h) overtime benefit facilities; (i) no/limited use of juvenile workers; (j) ensuring gender equity; (k) maintaining financial transparency; (l) no use of forced labour; (m) maintaining a proper mechanism for layoff and retrenchment and (n) ensuring workplace safety.

This section examines the existing practices of the above-mentioned issues at the factory levels. These have been carried out through the following indicators such as (i) practice of human and labour rights;

(ii) certification of HR-related practices; (iii) monitoring and inspection of HR issues, and (iv) addressing workers' complaints and grievance mechanisms.

5.1 Practice of Human and Labour Rights at the Enterprise Levels

Majority of the factories has an official position to deal with the key human rights issues noted in the previous paragraph {(a) to (n)}. About 81.6 per cent of the factories maintain public statements covering at least some of these human rights issues. While large and medium scale enterprises have the public statement of human and labour rights as high as 96 per cent of their factories, the share of small-scale enterprises is 56 per cent. In other words, small scale enterprises, which are the main segment of RMG enterprises, do not officially disclose labour rights-related practices. The announced public statement is found more in BGMEA factories (86 per cent) than BKMEA factories (74 per cent). Non-member factories are in a very poor state in having official disclosure (only 34 per cent). Public statements are found relatively high in factories located in Dhaka and Gazipur districts (77 per cent & 84 per cent respectively) and relatively less in Narayanganj and Chattogram districts (58 per cent & 64 per cent, respectively). Such membership-wise and location-wise variation portray a level of variation of practices of human and labour rights issues in different categories of enterprises.

The public statements disclosed by the factories relating to human rights and labour rights assume different forms. Most of the factories, 94.4 per cent, Utilise Posters for display inside the factory area as the main instrument for informing the workers about labour rights and practice issues. Apart from that, a section of factories uses other methods for public disclosure: 38.80 per cent of factories resort to Web-based publication, 25.90 per cent of factories include human and labour rights-related issues in their Charter, 23.20 mention the said issues in factory's Annual Report and 22.30 per cent of them utilise organisational Brochure for the purpose (Table 19). In other words, information dissemination within the factories is more vibrant than outside the factories. More public disclosure of this information through different means would ensure better transparency and accountability of the factories, we understand. The positive part is that the statements are written either in Bangla or in both Bangla and English languages, which helps workers easily understand the messages in addition to those preferring English.

Table 19: Statement on Human Rights

Options	% of Responses	% of (448) Cases
Website	19.00	38.80
Annual Report	11.30	23.20
Brochure	10.90	22.30
Charter	12.60	25.90
Poster inside the Factory	46.10	94.40
Others	0.00	0.00
Total	100.00	204.70

Source: CPD-Christian Aid Survey, 2021.

There is wide variation in public reporting of different issues (Figure 7). About 74 per cent of the factories maintain public statements on human rights issues such as child labour, workplace harassment, living wages, etc. (Table 20). This implies that the public statement of the factories does not cover all the

Figure 7: Factories Disclosing Public Statements on Human Rights
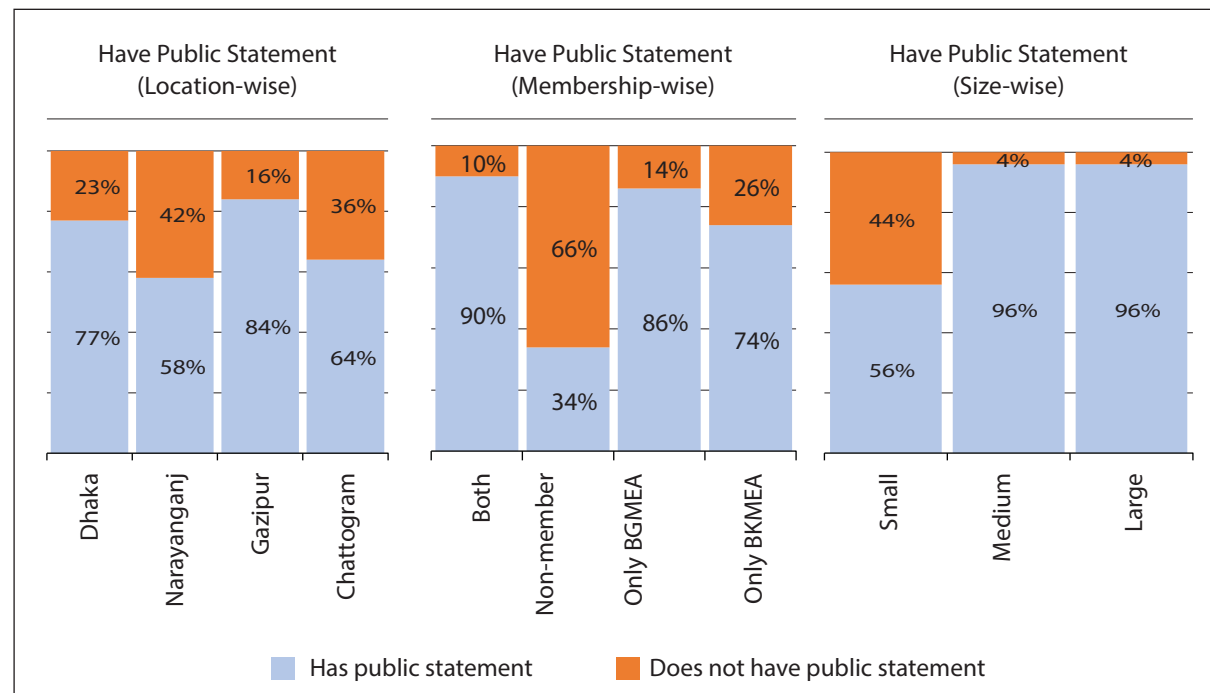
Source: CPD-Christian Aid Survey, 2021.

Table 20: Human and Labour Rights Issues Reflected in the Public Statement

Issues	Frequency	Percentage of 448 Cases
Child Labour	425.0	94.9
Workplace Harassment	370.0	82.6
Living Wage	395.0	88.2
Maternity Benefit	337.0	75.2
Child Care Benefit	278.0	62.1
Sexual Harassment	366.0	81.7
Collective Bargaining	160.0	35.7
Overtime Benefit	291.0	65.0
Juvenile Workers	259.0	57.8
Gender Equality	241.0	53.8
Financial Transparency	227.0	50.7
Forced Labor	238.0	53.1
Layoff and Retrenchment	114.0	25.4
Workplace Safety	378.0	84.4

Source: CPD-Christian Aid Survey, 2021.

human rights issues. Even though 94 per cent of factories replied that their statements could be found in posters inside the factory, it is difficult to indicate how much 'public' their statements are. Furthermore, around 97 per cent of factories claiming to have public HR statements (Figure 7). Figure 7 shows that

158 factories (84 per cent) in Gazipur have a public statement on HR, whereas 51 factories (42 per cent) in Narayanganj have no public statement. In case of membership, about 14 per cent of BGMEA member factories, 26 per cent of BKMEA member factories and as high as 66 per cent of non-member factories does not maintain public statements on human rights issues. Majority of factories maintain a dual-language public statement - about 66 per cent (241 factories) of the factories has public statements in both English and Bangla. In comparison, 33 per cent (122 factories) factories have the statement in Bangla. About 39 per cent of factories (174 factories) asserted that their public statement could be found on the website. The claim has been checked in 60 factories out of 174 factories that have claimed to have official websites. These factories are randomly chosen, and only 30 factories out of these 60 have a website, while 11 websites have specific content on human rights issues.

The public disclosure of factories does not necessarily mean that all the 14 issues get equal importance (Table 20) . The issues highlighted most in the public disclosure include "no use of child labour" (94.9 per cent), "payment of living wages" (88.2 per cent), "workplace and sexual harassment" (82 per cent), "provision of maternity benefit" (75.2 per cent) and "workplace safety" (84.4 per cent). However, some of the issues are less highlighted in public disclosure, such as the "limited use of juvenile workers" (57.8 per cent), "gender equity" (53.8 per cent), "no use of forced labour" (53.1 per cent) and "financial transparency" (50.7 per cent). The least addressed public disclosure issues are "lay off" and "retrenchments" (25.4 per cent) and "collective bargaining" (35.7 per cent). In other words, reporting of human and labour rights issues has been influenced by different factors, showing preference or lack of preference for some of the important issues. A broad-based and effective public disclosure is highly important as it is the first step towards ensuring factories' human and labour rights issues.

5.2 Certification of HR-related Practices

Many factories try to achieve different certifications and standards relating to "workers", "workplace safety", "pollution", "environment" and "sustainability" related issues (Table 21). Major standardisation and certification attained by the factories include ISO (International Organisation for Standardisation), Supplier Ethical Data Exchange (SEDEX), Worldwide Responsible Accredited Production (WRAP), OEKO-Tex, and LEED (Leadership in Energy and Environmental Design). About 62 per cent of the total surveyed factories indicated that they received at least one certificate/standard to comply with the requirements of the brands/buyers. Among the factories receiving certificates, 83 per cent claim to have realised certification in areas relating to "workplace safety", i.e., portraying factory practice relevant to maintaining safety standards in the workplace. The second most prevalent certification is

Table 21: Certification on Different Areas

Issues	Frequency	Percentage of Responses	Percentage of 373 Cases
Factory Workers	250.0	21.8	67.0
Workplace Safety	309.0	27.0	82.8
Pollution	177.0	15.5	47.5
Environment	266.0	23.2	71.3
Sustainability	143.0	12.5	38.3
Total	1145.0	100.0	307.0

Source: CPD-Christian Aid Survey, 2021.

Figure 8: Global Certification: Location-wise, Size-wise and Memberships-wise
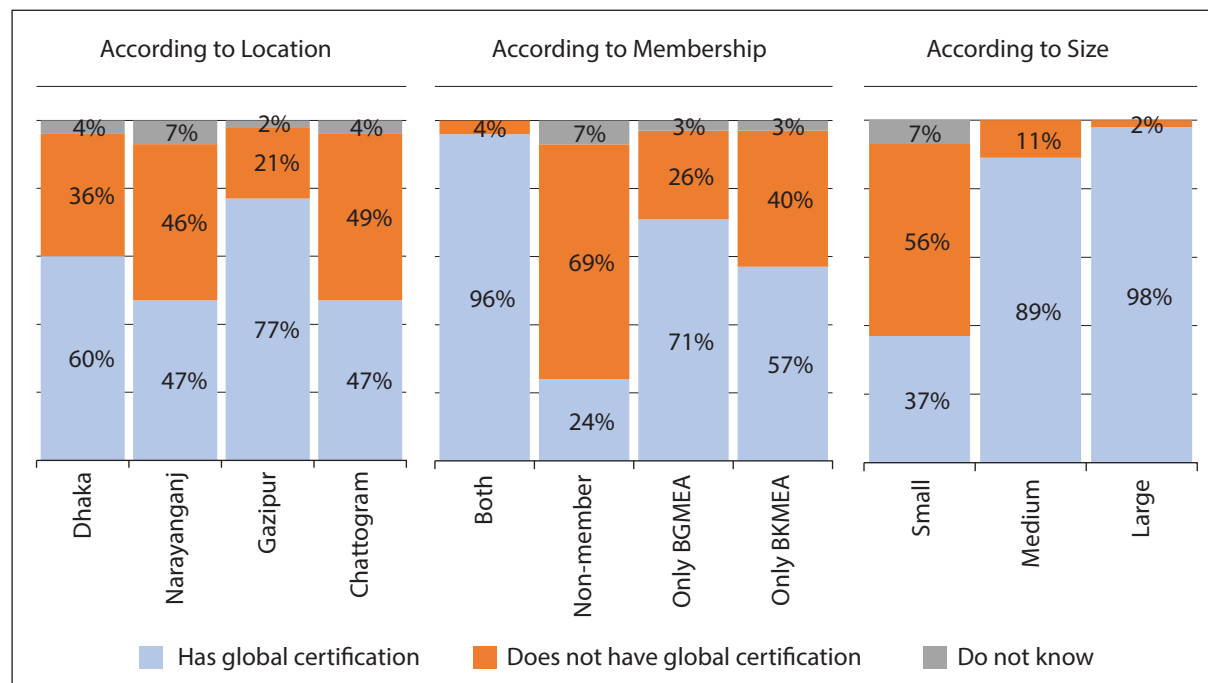
Source: CPD-Christian Aid Survey, 2021.

on "environmental" issues: about 71 per cent of the factories maintain some standards in this respect. However, attaining certifications and standards above do not necessarily imply real sustenance in terms of "workplace safety" and "workers' rights", given the weak motivation of factories, buyers, and brands to improve human rights and labour standards.

This study also investigated the trend of taking certificates by different categories of factories (Figure 8). While 98 per cent of the large size enterprises and 89 per cent of medium-sized enterprises possess more certificates by making a considerable investment, small size factories could manage fewer certificates, about 37 per cent perhaps due to their incapability to invest for certification. It can be observed that 60 per cent of the factories located in Dhaka and 77 per cent located in Gazipur could gather global certificates or accreditations. In comparison, this number is less than 50 per cent in both Narayanganj and Chattogram. Similarly, if this certification is categorised according to BGMEA and BKMEA membership, a substantial number of member-organisations are found to be more serious and effective about certificates or accreditations than non-member factories.

As shown above, the factories affiliated with both BGMEA and BKMEA have more certifications compared to non-member factories. It is to be noted that factories dependent on multiple brands/buyers try to comply more with the environment and workplace safety related issues other than workers' rights issues (Table 22). In other words, working with multiple brands and buyers provided opportunities to comply with multiple areas as per the interest of the buyers/brands.

Factories also follow a CoC with different brand buyers at the time of signing the contracts. According to this survey, 463 (77 per cent) factories and 448 (74 per cent) factories sign some CoC with the buyers covering various areas/issues. If a factory exports two-thirds of its production to a country, its

Table 22: Certification by Factories as per Contractual Arrangement with Buyers

Global Certification related Issues	Turnover Share: Top-most Buyer/Brand/Retailer in 2019			
	Less than 25%	Between 25-50%	Between 50-75%	More than 75%
Workers Rights	64.3	66.1	68.3	66.2
Workplace Safety	71.4	77.7	85.6	87.3
Pollution	57.1	44.6	50.3	43.7
Environment	78.6	76.0	71.3	62.0
Sustainability	50.0	43.8	37.7	28.2
Total	100.0	100.0	100.0	100.0

Source: CPD-Christian Aid Survey, 2021.

Figure 9: HR Issues Present in the CoC Relevant to the Top Buyers
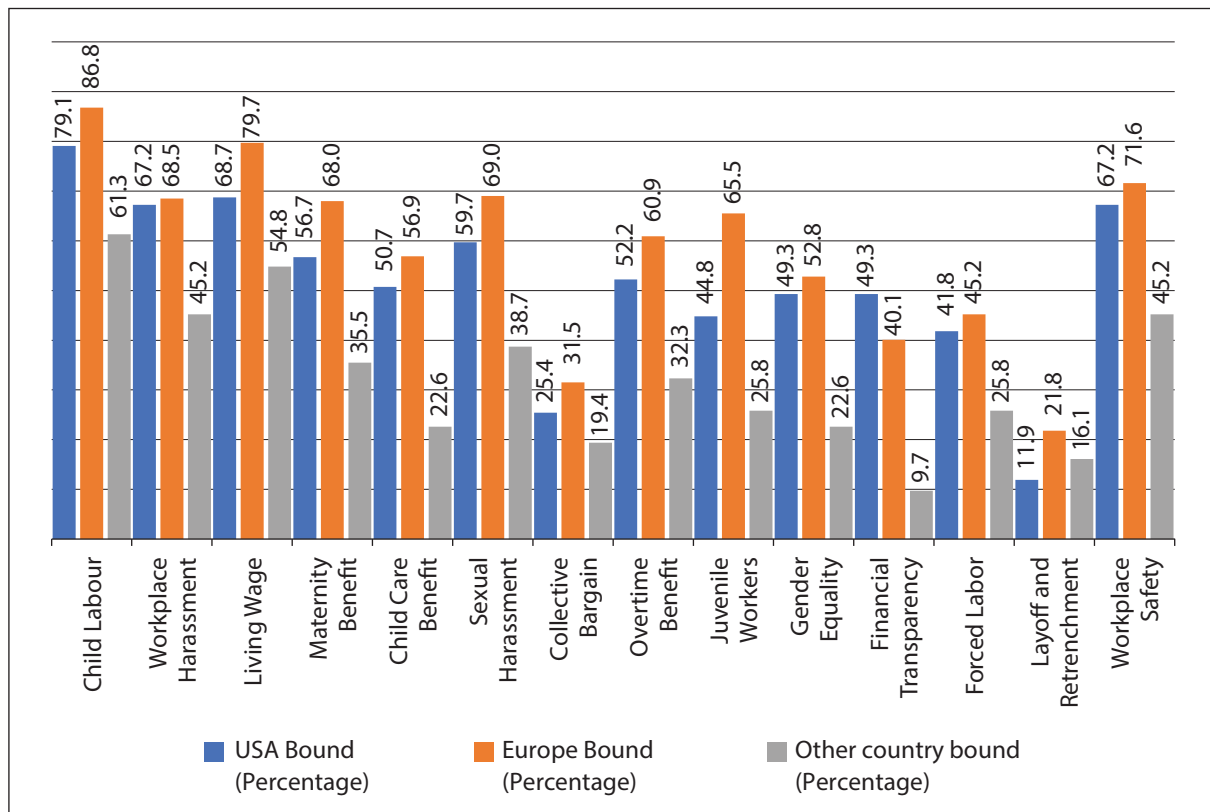
Source: CPD-Christian Aid Survey, 2021.

production is treated as "that country-bound". The process of multiple sourcing relevant to supply-orders from and apparel export to various countries follows different issues in their CoC, as shown in Figure 9. Maintaining human and labour rights in CoCs (code of conduct) of different brands and buyers reflect different country-wise scenarios. The practice of honouring human and labour rights issues is better revealed in the case of EU and US-bound export factories. In contrast, the practice of other country-bound suppliers is considerably less. In other words, CoCs have an essential role to play in the public disclosure of factories. A proactive stance of brands and buyers would facilitate the improvement of the CoC for the garment sector factories.

5.3 Monitoring and Inspection of HR Issues by Private and Public Agencies

RMG factories have been inspected by different public agencies on a regular basis as part of formal inspection processes. A number of public authorities inspected factories during 2019 and 2020, including DIFE, DOL (Govt. Department of Labour), Bangladesh Fire Service and Civil Defence (FSCD), RAJUK (Govt. Rajdhani Unnayon Kortipakshya), WASA (Govt. Water Supply and Sewerage Authority), PDB (Govt. Power Development Board), REB (Govt. Rural Electric Board), TITAS (Govt. Gas Transmission and Distribution Company), NBR (Govt. National Board of Revenue), DOE (Govt. Department of Environment), local authorities and others. Due to the COVID-19 pandemic, the total number of inspections declined by 10.20 per cent during 2020 compared to that in 2019. Table 23 records public authorities' level of inspection of factories. During a normal year of operation (2019), the highest number of inspections has been conducted by DIFE (79.27 per cent), followed by FSCD (64.68 per cent), DoL (42.62 per cent), DoE (23.22 per cent) and NBR (18.91 per cent). Factory Inspection has been relatively less by PDB/REB (11.77 per cent), TITAS (6.80), WASA (4.81 per cent) and RAJUK (3.81 per cent),. Local authorities such as City Corporation, Municipalities and Pourasava visited 19.90 per cent of factories in 2019. Given the higher frequency of inspection by DIFE, DoL and FSCD, it appears that "workers' well-being", "workplace safety", and "workers' rights" issues have been the most monitored issues of garment factories. Hence, workers' human and labour rights issues are supposed to be better monitored and better maintained by the factories. Despite that, 9.1 per cent of factories were out of public authorities' inspection, mainly small factories; so, "workers' safety" and "labour rights" issues remain vulnerable in those factories.

Table 23: Public Authority Inspected Sample Factories in 2019 (Size-wise)

Size of the Factory	Factory Inspection by Public Authority in 2019											
	DIFE	DoL	FSCD	RAJUK	WASA	PDB/ REB	TITAS/ Any other Gas	NBR	DoE	Local Authorities	Others	Not inspected
Large (N=46)	93.48	63.04	78.26	2.17	6.52	26.09	15.22	23.91	36.96	28.26	2.17	0.00
Medium (N=231)	90.48	50.65	68.40	4.76	6.06	13.85	10.82	25.11	31.60	27.27	2.60	2.60
Small (N=326)	69.33	34.05	60.12	3.37	3.68	8.28	2.76	13.80	15.34	13.50	0.92	15.03
Total (N=603)	79.27	42.62	64.68	3.81	4.81	11.77	6.80	18.91	23.22	19.90	1.66	9.12

Source: CPD-Christian Aid Survey, 2021.

Due to the COVID-19 pandemic, the number of inspection visits reduced in 2020 compared to 2019 (Figure 10). The highest level of reduction in inspection was observed in case of DOE and DoL, followed by DIFE. On the contrary, the reduction of the visit was lower in case of FSCD and local authorities. Interestingly, visit by the PDB/REB officials had increased by 26.8 per cent during the pandemic year.

Next, this survey inquired whether the public agencies had any complaints about the factories (Figure 11). A total of 134 (24 per cent) factories acknowledged that public agencies had some kind of complaints about their factories, and out of these factories, 36 (27 per cent) factories confirmed that these agencies

Figure 10: Changes in Frequency of Visits During Pre-COVID Period and COVID Period

Bar chart values:
- DIFE: −14.0
- DOL: −20.6
- FSCD: −1.3
- RAJUK: −13.0
- WASA: −6.9
- PDB/REB: 26.8
- TITAS/ Any other gas company: −12.2
- NBR: −16.7
- DOE: −22.1
- Local Authorities: −2.5
- Others: −20.0
- Not inspected: −10.2
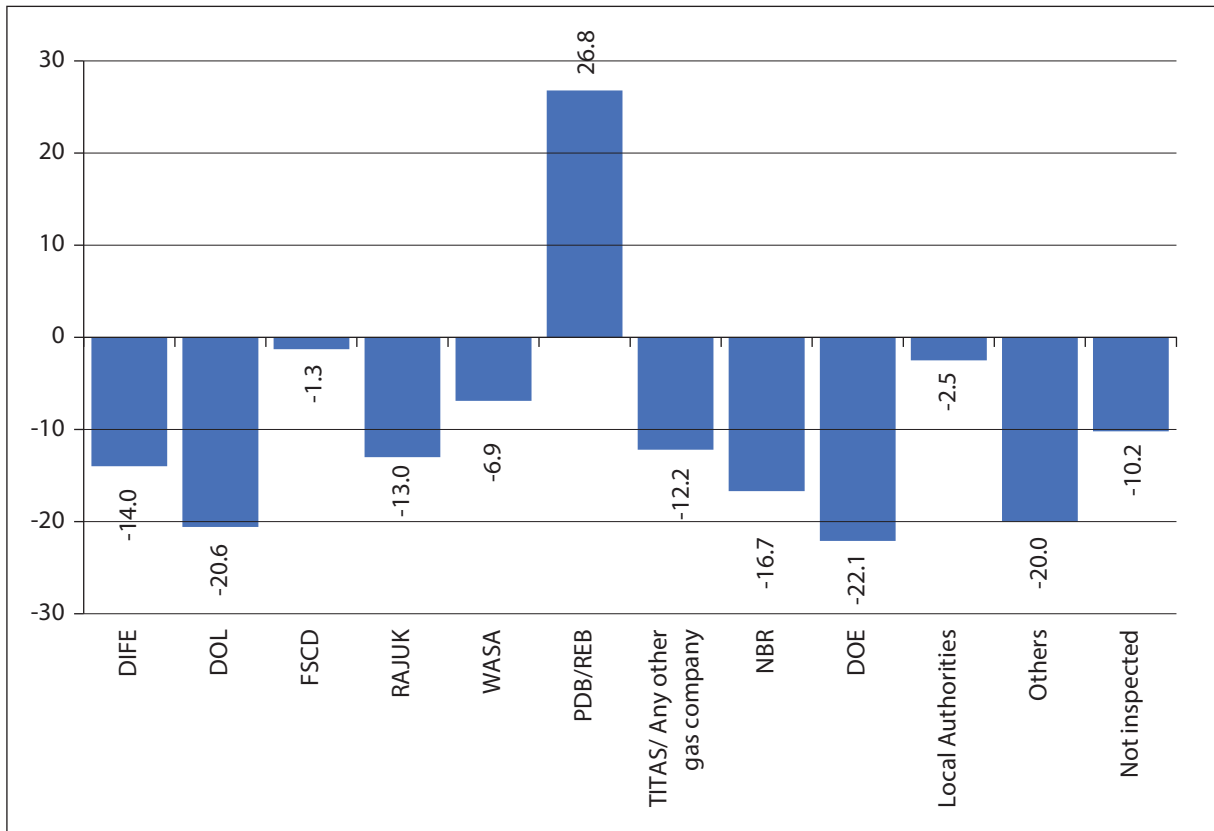
Source: CPD-Christian Aid Survey, 2021.

Figure 11: Complaints by Public Authority: Location-wise, Size-wise and Membership-wise

Compliants by Authority (Location-wise)
- Dhaka: 12% Has complaints, 86% Does not have complaints, 2% Do not know
- Narayanganj: 52% Has complaints, 45% Does not have complaints, 3% Do not know
- Gazipur: 18% Has complaints, 80% Does not have complaints, 2% Do not know
- Chattogram: 30% Has complaints, 64% Does not have complaints, 6% Do not know

Compliants by Authority (Membership-wise)
- Both: 46% Has complaints, 52% Does not have complaints, 2% Do not know
- Nonmember: 25% Has complaints, 73% Does not have complaints, 2% Do not know
- Only BGMEA: 17% Has complaints, 80% Does not have complaints, 3% Do not know
- Only BKMEA: 34% Has complaints, 64% Does not have complaints, 2% Do not know

Compliants by Authority (Size-wise)
- Small: 30% Has complaints, 66% Does not have complaints, 4% Do not know
- Medium: 19% Has complaints, 79% Does not have complaints, 2% Do not know
- Large: 13% Has complaints, 87% Does not have complaints

Legend: ■ Has complaints ■ Does not have complaints ■ Do not know

Source: CPD-Christian Aid Survey, 2021.

suggested some punitive measures against them. However, all of these 36 factories reported that they had addressed those issues (47 per cent fully and 53 per cent partially). In the case of size-wise distribution, small factories received a higher percentage of complaints (30 per cent), given their struggle to maintain a minimum level of compliance. We might quote the readings from Figure 11 to confirm that (a) majority factories located in Dhaka (86 per cent), Gazipur (80 per cent) and Chattogram (64 per cent) did not have any complaint from the public authority; (b) 87 per cent large category factories, 79 per cent medium and 66 per cent small-type factories received no complaints against them; and (c) 80 per cent BGMEA-affiliated factories and 64 per cent BKMEA-affiliates did not have any complaint from the authority.

Grouped by district, factories from Dhaka and Gazipur have thus comparatively fewer complaints than that from Narayanganj and Chattogram. In the case of Narayanganj, 52 per cent of the factories informed public inspection agencies of complaints against them. This partly indicates a weak state of compliance on various issues, including human and labour standards in factories located in Narayangonj.

5.4 Addressing Workers' Complaints and Grievance Mechanism

A functional grievance mechanism operational in the garments factory is a manifestation of institutionalisation of human and labour rights concerns in RMG factories. Table 24 provides a summary of workers' complaints and grievance mechanisms by the factories. Out of 460 factories responding to the complaints made in 2020, a factory received on average 6.20 per cent complaints in 2020. According to factory management, the majority of official complaints have been addressed. However, the number of official complaints in the factory is lower than that of unofficial complaints, and unofficial complaints continue to increase. However, factory management claimed that unofficial complaints are mostly addressed.

Table 24: Official and Unofficial Complaints Made by Workers

Issues	Sample Size (N)	Mean	Standard Deviation	Minimum	Maximum
Official Complaints from the Workers	460.0	6.2	12.8	0.0	80.0
Official Complaints Addressed (%)	210.0	98.7	7.8	20.0	100.0
Official Complaints (% female)	210.0	8.4	12.0	0.0	60.0
Unofficial Complaints from the Workers	465.0	22.2	35.2	0.0	185.0
Unofficial Complaints Addressed (%)	364.0	98.7	8.1	5.0	100.0
Unofficial Complaints (% female)	363.0	17.6	26.2	3.0	168.0

Source: CPD-Christian Aid Survey, 2021.

Looking at the average is not enough for workers' complaints; rather, this study analysed this average in terms of factory location, membership and size; findings available in Table 25 . Here, an interesting picture can be observed: even though factories located in Narayanganj have a high number of complaints from the public authority, they have a low number of average complaints from workers. This is also true for other districts as well; if the number of complaints by public authority increases, then unofficial complaints of workers decrease. This fact most probably stems from the fact that the HR condition of these factories is low, and so, workers do not feel confident to submit unofficial complaints, let alone an official complaint. In other words, the grievance mechanisms of these factories are poor.

Table 25: Average Official and Unofficial Complaints (District-wise, Membership-wise, and Size-wise)

Districts	Average Unofficial Complaints	Membership	Average Unofficial Complaints	Size of the Factory	Average Unofficial Complaints
Dhaka	27.3	Both	25.0	Small	12.9
Narayanganj	12.4	Non-member	11.9	Medium	32.3
Gazipur	24.9	BGMEA	28.1	Large	49.0
Chattogram	20.6	BKMEA	16.0	-	-

Source: CPD-Christian Aid Survey, 2021.

Complaints by workers increase as the size of factories increases, but this is not unexpected that if the workers' number in the factory increases, then unofficial complaints by workers would increase naturally. The fact to note here is that the number of complaints by workers is not necessarily a bad thing; rather, it shows that workers feel comfortable raising their complaints, which is very important in developing a transparent working environment.[14]

5.5 Perception of HR Practices on Firm-level Cost and Income

The perception of the factory management on human and labour rights practices and their implications on firm-level cost and income is highly important. If the factory management considers upholding human rights costly, they most likely try to evade these practices whenever they can. However, this study found that the majority of the factories think maintaining human rights is better for their business. At the time of KIIs with factory owners and buyers, they described this link with human rights and productivity. According to them, many human rights such as maternity benefits, harassment-free workplace and safe workplace generate a happy and productive workforce. This study also reaffirmed this fact, as a whopping 97 per cent (582) of factories think that improving human rights conditions in their factory would scale up the efficiency of the workers.

At the same time, about 79 per cent (478) of the factories believe that improving human rights conditions in the factories would result in augmentation of the fixed and operational costs of the factory. Figure 12 corroborates this fact: 70 per cent to 80 per cent of the factories on average have opined about a surge in operational cost triggered by the improvisation of human rights scenario in the factory, regardless of factory size, location and membership.

It is a positive sign for the human rights condition of the Bangladesh RMG sector if factories realise that improving the human rights perspective would ultimately fetch the factories more and more Work-Orders from abroad. Majority of factories (94 per cent) think that improving human rights will augment their purchase orders from the buyers, which eventually add to their revenue earnings. This perception is well reflected in Figure 13 : RMG factories have overwhelmingly (more than 90 per cent) responded affirmatively to enhanced Supply Orders from overseas buyers amidst better human rights environs enjoyed by the workers. Maximum number of factories recognise this fact in all districts; almost all the BGMEA and BKMEA affiliate factories and non-member factories provide a uniform thought as, according to them, improving human rights issues would lead to an increase in Apparel Supply Orders;

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[14]For the factories which have zero levels of complaints in a year means that they have either perfect working conditions that workers do not have any complaint or, more realistically, workers fear the backlash for complaining.

Figure 12: Perception on Impact of Improvement in Human Rights on Operational Cost (Size-wise, Membership-wise and Location-wise)
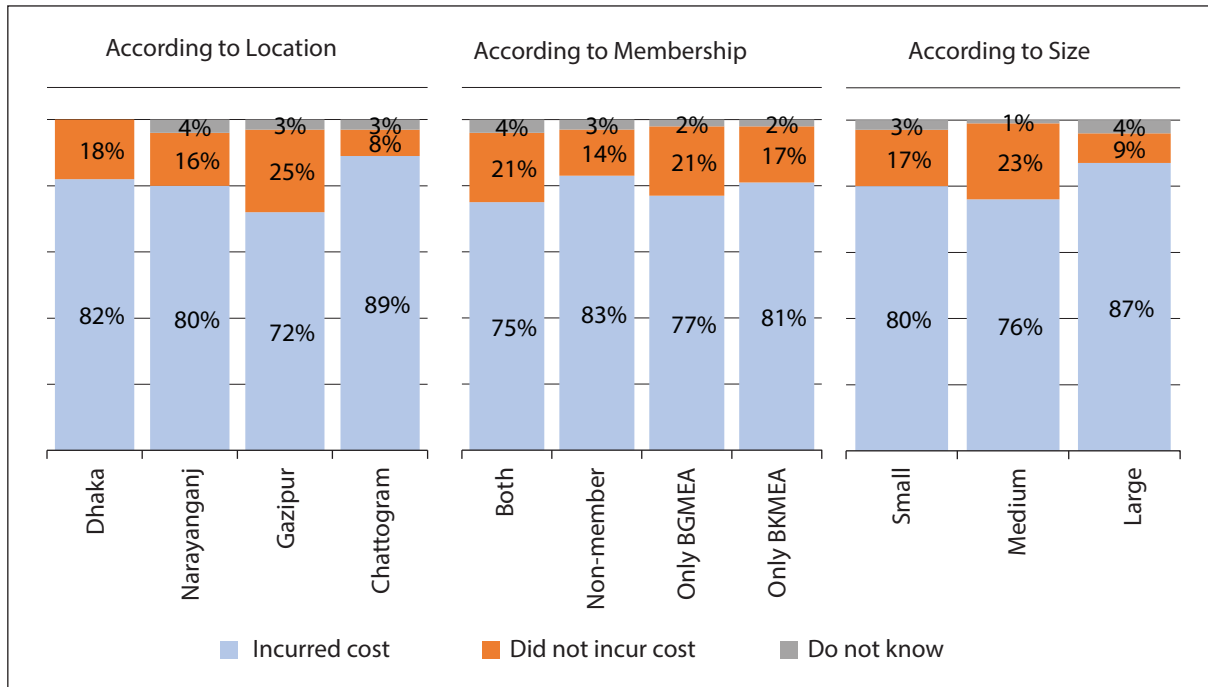
Source: CPD-Christian Aid Survey, 2021.

Figure 13: Perception on the Increment of Orders due to Improvement of Human Rights (Location-wise, Membership-wise and Size-wise)
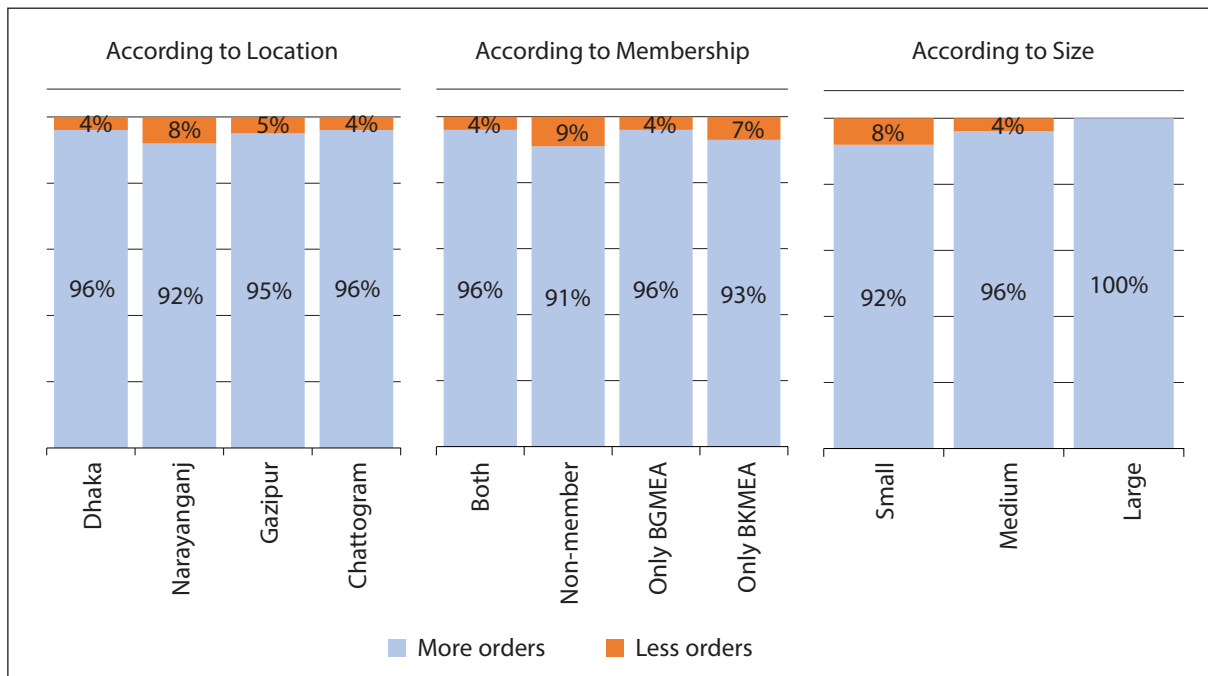
Source: CPD-Christian Aid Survey, 2021.

Figure 14: Perception on Reduced Profit Due to Improvement of Human Rights (Size-wise and Location-wise)
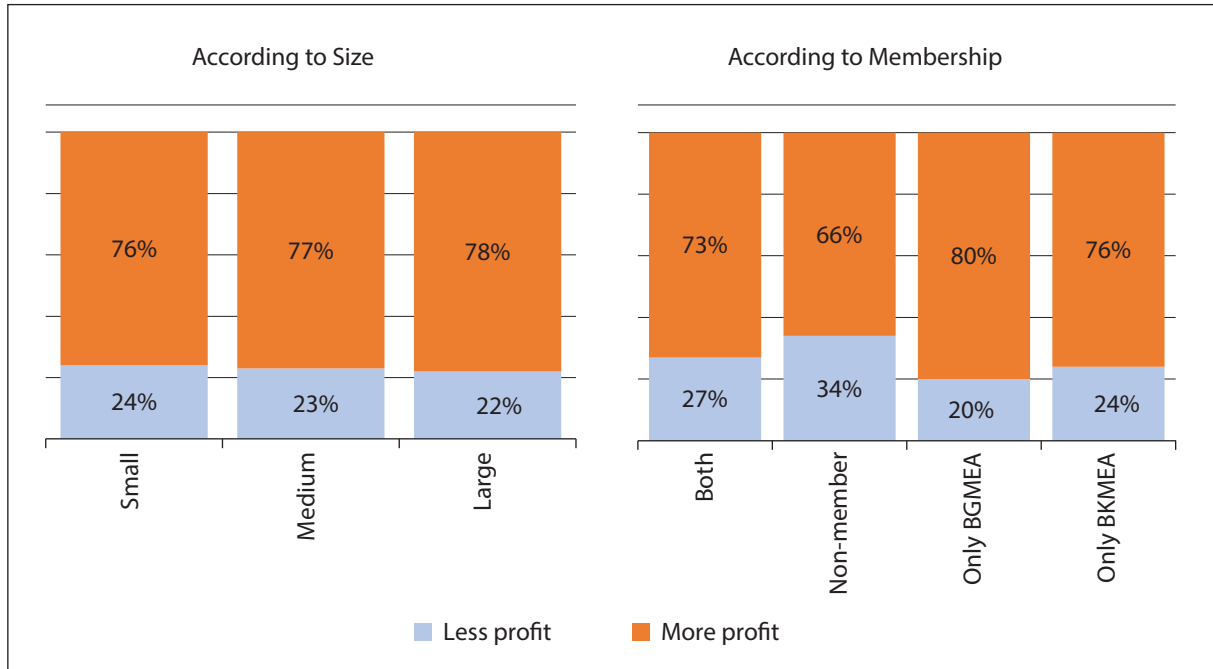
and identical view has been expressed by more than 90 per cent of the large, medium and small factories. Alternatively, only less than 10 per cent of the suppliers think improving human rights issues has no relation with foreign buyers' orders.

This study also examines the perception of the factories about whether or not improving human rights issues in their factory will decline their profit. Figure 14 does, however, evince a positive stance in this respect: only less than 25 per cent of factories of all sizes feel reduced profit because of the improvement of human rights issues. And 66 to 80 per cent of factories affiliated to BGMEA and BKMEA or non-member claim their profit would not be affected for any improvement of human rights issues.

6. Understanding and Practice of UNGPs at the Enterprise Level

The discussion on the factory-level practice of human and labour rights issues in section 6 has set a benchmark for assessing the state of UNGPs in RMG factories. The UNGPs have been explained in terms of enterprise-level practices through eight indicators. As mentioned in the methodology section of the study, a total of eight indicators have been considered for the evaluation of UNGPs. These include (a) HR Policy Commitment; (b) Governance and Embeddedness; (c) Risks Prioritisation; (d) Stakeholder Engagement; (e) Assessing Human Risks; (f) Integration and Mitigation measures; (g) Tracking; (h) Remedy & Grievance mechanism; plus (i) cross-cutting indicators. Following analysis provides a detailed account of the state of eight indicators in sample RMG factories.

It needs to be mentioned that the majority of factory management officials, about 70 per cent, claimed their knowledge and idea about UNGPs. Among these factories, 48 per cent states that their public statements draw fully on the UNGPs, 46 per cent operates partially in accordance with UNGPs, and the

response from the rest 6 per cent is: either they do not know anything about UNGPs or don't follow UNGPs standard.

6.1 HR Policy Commitment

According to UNGPs, a company/enterprise must bear and hold a "human rights" statement affirming that it will respect human rights. The central components of this statement should include all internationally recognised human rights extended to the value chain. These include the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration); the OECD Guidelines for Multinational Enterprises (OECD Guidelines), and the UN Guiding Principles on Business and Human Rights (UNGPBHR). Also, there should not only be high-level statements; rather, it should express detailed commitment to that effect. In this study, 459 factories (76 per cent) submitted that they have a statement confirming they will respect human rights. However, to qualify for UNGPs compliance, this disclosure has to be made public.

It is important to note that factories consider posters projecting human rights matters and displayed inside their factory as public documents. Their reasoning behind this has been that workers can read these posters and get an idea of their rights, and Inspectors from government agencies and overseas buyers can also read these statements. However, when this study looked into this fact membership-wise, about 65 and 60 per cent BGMEA and both BGMEA and BKMEA member-factories exposed their statement publicly, while 28 and 38 per cent of them have human rights related statements but only for their internal use (Figure 15). Also, it is alarming that above 15 per cent of the non-member and BKMEA factories have no idea of human rights statements. In terms of factory locations, Dhaka and Gazipur

Figure 15: Perception on Statement Respecting Human Rights (Location-wise and Size-wise)
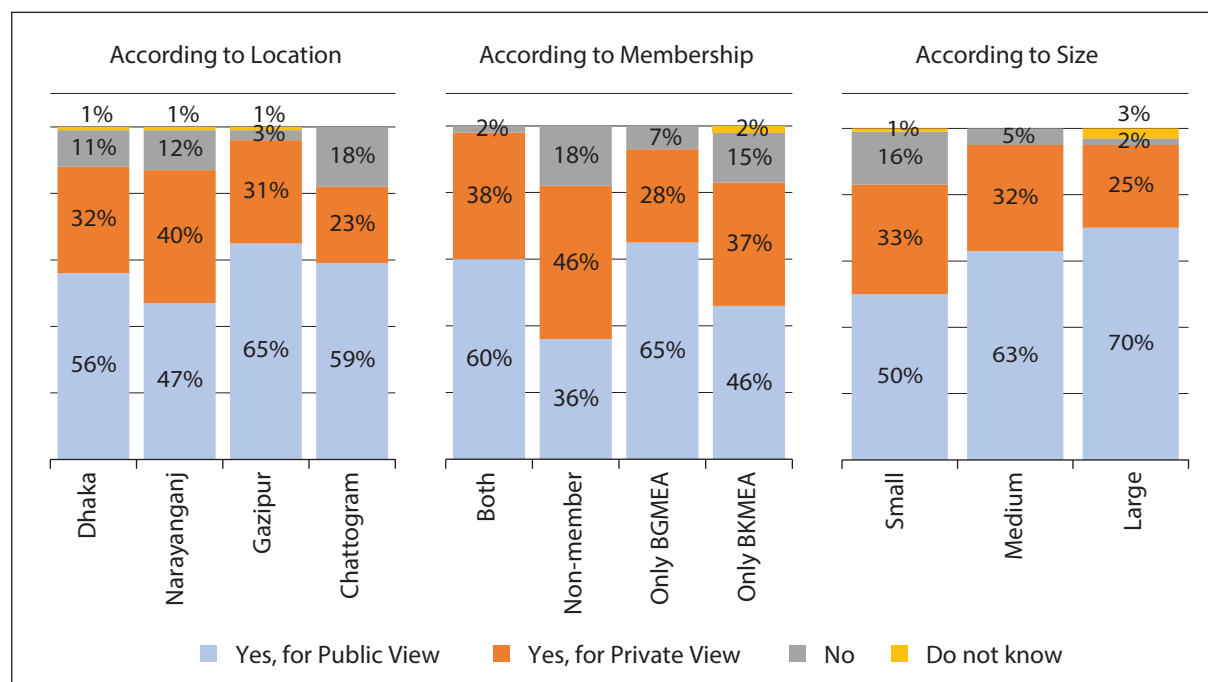
Source: CPD-Christian Aid Survey, 2021.

were again ahead in this compared to Narayanganj and Chattogram. Dhaka and Gazipur accommodate 56 per cent and 65 per cent factories, respectively; they hold on to the statement on human rights committing their respect for workers right to better livelihoods within the ambit of Labour Laws and in accordance with UNGPs (Figure 15) . In contrast, above 10 per cent of the factories located in those four districts have no public statement on human rights.

6.2 Governance and Embeddedness

It is relevant and vital to identify the responsibility in a company/factory for fulfilling the human rights requirement to show the company's respect for human rights. Therefore, the company's disclosure in this respect should show who is/are responsible for implementing human rights issues and what responsibilities their job entails. Therefore, the company should have a mature Senior Administrator on its staff panel to be involved in this process.

In this study, as many as 484 factories (80 per cent) replied that they have either a person or department to include human rights issues within the factory's day-to-day activities. These persons are at the managerial level in case of 61 per cent factories, at above the managerial level in 9 per cent cases, in 25 per cent cases at assistant managerial level and at lower than assistant managerial level in the rest 5 per cent factories. Thus, a mixed scenario is observed in terms of delegation of authority in maintaining governance-related compliance at the factory level. This clearly demonstrates a lack of importance of human rights on the part of lower-level administrators possessing little to no authorisation about how the activities of the factory proceeds. If this comparison is considered size-wise, then all the large-scale factories claim to have a statement as to who would be responsible for human rights in the factory; this is quite expected as these factories have more organised organograms with detailed job descriptions. While only 67 per cent of small-scale factories have a specified person responsible for human rights, the figure is 96 per cent in medium-range factories and 100 per cent in case of large-scale factories. Ninety (90) per cent of the factories affiliated with BGMEA or both BGMEA and BKMEA bear the statement that they have a responsible person for dealing with human rights issues in the factory. Fifty-two (52) per cent of factories that are neither a member of BGMEA nor of BKMEA have this statement, and 76 per cent of BKMEA-affiliate factories honour human rights for their workers.

The assigned person/unit/department covers major human rights issues at different levels. The highest priority is attached to issues such as "child labour", "sexual harassment", "workplace safety" and "decent wages". On the other hand, some of the issues find less priority at the hands of the assigned officers, such as "lay-offs and retrenchment", "collective bargaining", "financial transparency", etc.

Table 26 examines whether all the factories have written documents describing the "respective department/person dealing with human rights issues", "their rank or designation", "the human rights issues they cover" and "terms of references (ToR)" for those undertaking the human rights issues. A total of 484 (81 per cent) factories responded to these issues. About 45.25 per cent of factories claimed that they have a responsible person or department working on the human rights issues well described in a written document for the private view. On the other hand, authorities and workers of 31.82 per cent of factories confirmed that there is a written document for both public and private view containing the department/person dealing with human rights issues. Also, 40.50 per cent and 33.30 per cent of factories responded that ranks/designations of these responsible persons are mentioned in a written document for (i) private view and (ii) both public and private view respectively.

Table 26: Factories with Written Documents on Respective Issues

Written Document	Response on Public View	Response on Private View	Response on both Public and Private View	No Response	No Idea	Total
Person/ Department responsible for dealing with HR issues in factory	5.8	45.3	31.8	16.9	0.2	100.0
Rank/Designation of the persons responsible for human rights issues	7.4	40.5	33.3	18.8	0.0	100.0
HR issues covered by that person or unit or department	5.9	41.7	34.1	17.9	0.2	100.0
ToR of these people for undertaking human rights issues	6.4	44.2	27.5	19.4	2.5	100.0

Source: CPD-Christian Aid Survey, 2021.

Furthermore, responsible persons/units/departments in around 42 and 34 per cent of factories covered all the human rights issues for (i) private view and (ii) both public and private view respectively. Lastly, 44.2 and 27.5 per cent of factories have ToR in a written document for the same purpose for (i) private view and (ii) both public and private view. On the other hand, around 17-20 per cent of factories didn't respond to the written document covering all the four issues relevant to human rights and related issues mentioned in Table 26.

Figure 16: Human Rights Related Issues Disclosed for Public View (By Size of the Factory)
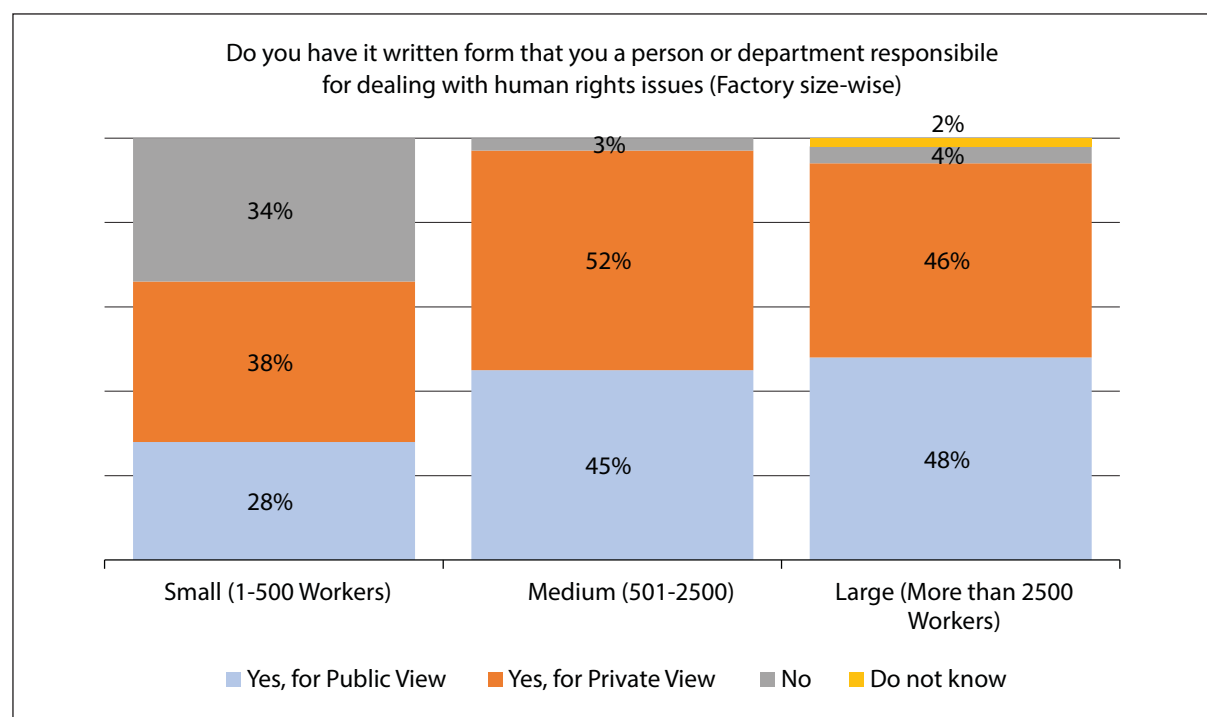
Source: Authors' illustration.

As the size of the factory increases, so does the percentage of factories reflecting these info/data in their public disclosure. According to Figure 16 and 28 per cent of small factories have this information for public view; and 45 per cent and 47 per cent of Medium-sized and Large-sized factories, respectively, have this information for public view.

6.3 Risks Prioritisation

According to the UNGPs standard, companies/enterprises/factories should identify the salient human rights issues at most risk in their institution. They should determine which problems are the most important for their factories and which are not. UNGPs also assist factories in working on human rights issues on a priority basis. This study found that no factory could pinpoint which is the most important or salient HR issue for their company; instead, our research found them attaching importance to all the issues at hand. In addition, they consider it essential for them to work on whatever the governmental bodies look for and what buyers expect to inspect in their factories. They do not seem very much concerned with other issues. When a factory thinks and states some issues are not essential for them to take care of, the proposition might lead one to two conclusions. First, they no longer feel any problem with those issues, and they are no longer concerned about them. Therefore, this is not their priority issue. Second, buyers' inspection initiatives and public initiatives are not concerned with specific issues, and therefore, factories also do not care for those issues and consequently, that is not a priority issue. Figure 17 and Figure 18 show the most important issues in terms of risks for factories based on factory size. Most priority issues for the majority of factories are (a) child-care benefit, child labour, collective bargaining, living wages, maternity benefit, sexual harassment, and workplace harassment as per Figure 17, and (b) financial transparency, forced labour, gender equity, juvenile workers, layoff and retrenchment, overtime benefit and workplace safety as per Figure 18. Some of the issues like lay off, retrenchment, and collective bargaining show less priority in a considerable share of factories. Small factories put less focus on some issues, such as child-care benefits. The prioritisation of the aforesaid issues in terms of risks is found to be influenced by costs incurred for maintaining specific compliance or for avoiding workers' collective voice for their entitlements.

Figure 17: Prioritisation of Risks and Identification of Salient Human Rights Issues (I)

Child Care Benefit

Large (More than 2500 Workers)	2% 2% 96%
Medium (501-2500)	6% 4% 90%
Small (1-500 Workers)	17% 11% 72%

Child Labour

Large (More than 2500 Workers)	100%
Medium (501-2500)	100%
Small (1-500 Workers)	1% 2% 97%

Collective Bargain

Large (More than 2500 Workers)	4% 13% 83%
Medium (501-2500)	8% 15% 77%
Small (1-500 Workers)	14% 19% 67%

Living Wage

Large (More than 2500 Workers)	2% 98%
Medium (501-2500)	2% 1% 97%
Small (1-500 Workers)	2% 2% 96%

Maternity Benefit

Large (More than 2500 Workers)	100%
Medium (501-2500)	2% 3% 95%
Small (1-500 Workers)	5% 8% 87%

Sexual Harassment

Large (More than 2500 Workers)	100%
Medium (501-2500)	100%
Small (1-500 Workers)	1% 1% 98%

Workplace Harassment

Large (More than 2500 Workers)	100%
Medium (501-2500)	1% 2% 97%
Small (1-500 Workers)	2% 4% 94%

■ Not Important at all/Less Important   ■ Neutral   ▨ Important/Very Important

Source: CPD-Christian Aid Survey, 2021.

Figure 18: Prioritisation of Risks and Identification of Salient Human Rights Issues (II)

Financial Transparency

Large (More than 2500 Workers)	4% 3%	93%
Medium (501-2500)	5% 8%	87%
Small (1-500 Workers)	11% 13%	76%

Chart Title

Large (More than 2500 Workers)	2%	98%
Medium (501-2500)	2% 1%	97%
Small (1-500 Workers)	5% 3%	92%

Gender Equality

Large (More than 2500 Workers)	2% 2%	96%
Medium (501-2500)	2% 7%	91%
Small (1-500 Workers)	2% 8%	90%

Juvenile Workers

Large (More than 2500 Workers)		100%
Medium (501-2500)	1% 2%	97%
Small (1-500 Workers)	2% 4%	94%

Layoff and Retrenchment

Large (More than 2500 Workers)	2% 11%	87%
Medium (501-2500)	5% 13%	82%
Small (1-500 Workers)	12% 16%	72%

Overtime Benefit

Large (More than 2500 Workers)	7% 2%	91%
Medium (501-2500)	2% 3%	95%
Small (1-500 Workers)	2% 6%	92%

Workplace Safety

Large (More than 2500 Workers)	2%	98%
Medium (501-2500)		100%
Small (1-500 Workers)	2%	98%

■ Not Important at all/Less Important ■ Neutral ■ Important/Very Important

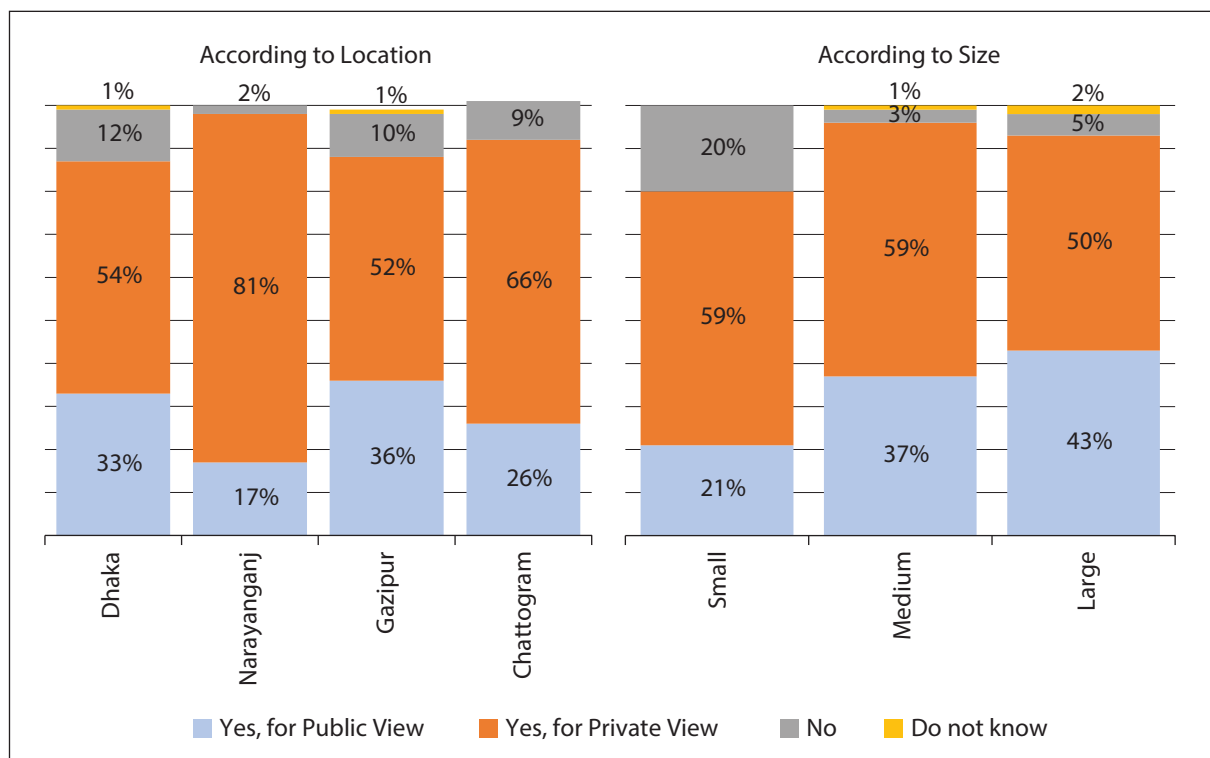**Source:** CPD–Christian Aid Survey, 2021.

6.4 Stakeholder Engagement

A significant part of companies/enterprises needs to work with stakeholders who are adversely affected by the company's activities or to work with stakeholders who guide companies to undertake human rights practices better. Also, quality disclosure should include the method of engagement and frequency of engagements with different stakeholders as well as the criterion of selecting stakeholders.

In this survey, 364 factories (60 per cent) claim that they engage in discussion and/or regular meetings with different stakeholders to improve human rights in the factory. About 63 per cent of factories in Dhaka and 72 per cent of factories in Gazipur are reported to hold a meeting with stakeholders. Chattogram comes after that where 50 per cent of the factories hold such discussion/meeting, and in Narayanganj, only 41 per cent of the factories are engaged with different stakeholders for discussion and/or meeting in respect of advancing the cause of human rights. As the size increases, the percentage of factories interacting with different stakeholders expands. 45 per cent, 76 per cent and 96 per cent of the small, medium and large factories respectively maintain linkage with different stakeholders.

If stakeholder engagement with factories is considered in terms of factory's membership, then both BGMEA and BKMEA member-factories hold an enabling stance. As much as 77 per cent of factories having membership with BGMEA and BKMEA have regular engagement with stakeholders, and 71 per cent of the BGMEA members maintain this engagement. Meanwhile, 55 per cent of only BKMEA-associate members and 28 per cent of non-member factories reportedly undertake engagement with stakeholders at suitable times to improve the human rights situation in the factories.

Figure 19: Written Statement on Factory Engagement with Different Stakeholders to Improve HR Condition (Location-wise and Size-wise)

Source: CPD-Christian Aid Survey, 2021.

About 31 per cent of the factories on average, have written form for public view that they engage with different stakeholders regularly (Figure 19) above. This reveals the basic maturity level of disclosure that these factories have on this micro-component. This number is higher for Dhaka and Gazipur district than Narayanganj and Chattogram district, as Figure 19 depicts. Written in public disclosure on stakeholders' engagement increases with the size of the factories. 43 per cent of the large factories have this statement for public view whereas the percentage is 37 and 21 for medium and small factories respectively.

Factories engage with different organisations and entities on human and labour rights issues (Table 27). The highest level of engagement is observed with public agencies-67.80 per cent, followed by workers' organisations such as Workers Participation Committee (WPCs) and Workers Welfare Committee (WWCs)-65 per cent and anti-harassment committees-55.90 per cent. A modest level of engagement is observed with international agencies like ILO and NGOs, buyers, law enforcement agencies and trade unions. Relatively less engagement is observed with national and international workers organisations.

Table 27: Factories Engagement with Organisations/Committees to Improve HR Condition

Organisations/Committees	Frequency (Out of 143)	% (in case of 143)
NGOs	46.00	32.17
WPC/WWC	93.00	65.03
Anti-harassment Committee	80.00	55.94
Other Government Agencies	52.00	36.36
Government Agencies (DIFE, DOL)	97.00	67.83
Law Enforcement Agencies	38.00	26.57
Buyers	44.00	30.77
Trade Union	31.00	21.68
National Workers Organisation	18.00	12.59
International Workers Organisation	21.00	14.69
International Agencies (ILO, etc.)	48.00	33.57
Others (Please Specify)	0.00	0.00

Source: CPD-Christian Aid Survey, 2021.

6.5 Assessing Human Risks

Factories should have a proper risk assessment exercise to make sure they can assess the impact of their programs/activities on human rights and take measures towards mitigation of risks as and when identified. 493 factories—82 per cent confirmed having a methodology to identify how factories are found to threaten human rights. However, out of these 493 factories, only 37 per cent claim that they have this document written for public view (Figure 20). This fulfils the basic maturity level of this issue.

Figure 20: Statement Containing Procedure of Tracking Human Rights Progress (Size-wise and Location-wise)
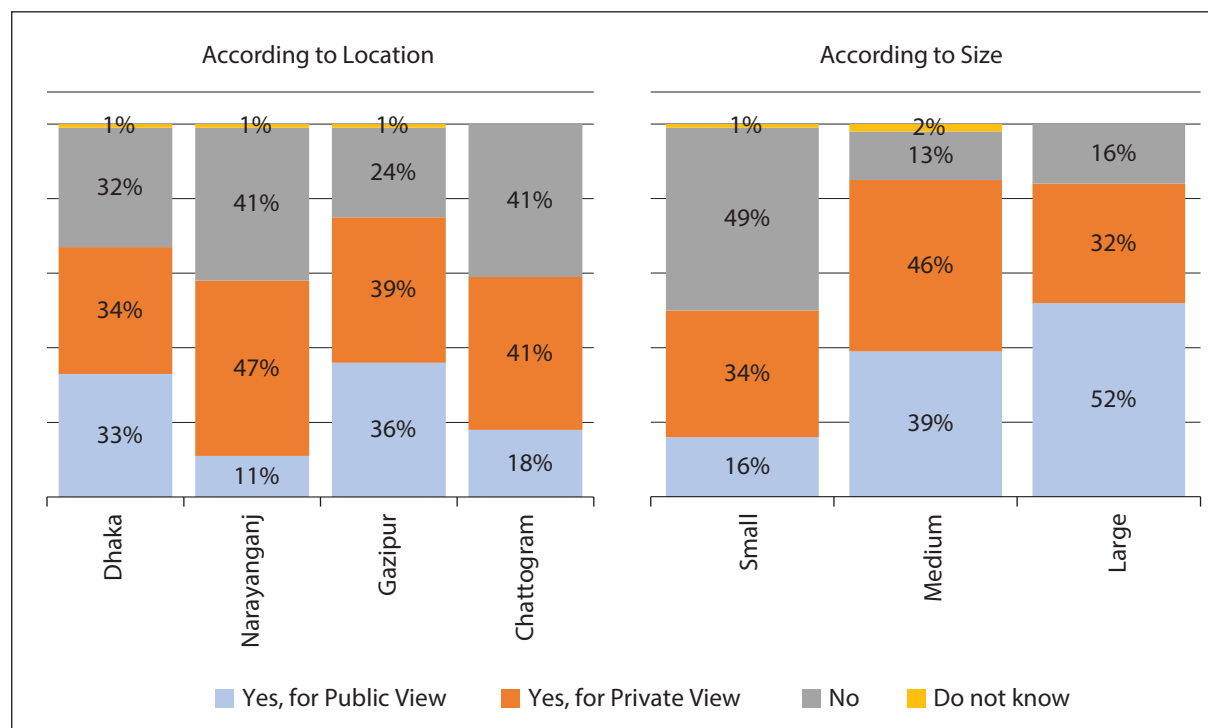
Source: CPD-Christian Aid Survey, 2021.

6.6 Integration and Mitigation Measures (A95–A99)

Companies/enterprises/factories should integrate mitigation measures to reduce human rights violations resulting from their activities within their jurisdiction. Therefore, public disclosure on the part of factories should include mitigation measures in case of human rights violations, and those should be integrated into their practice. Also, matured disclosures should include examples and details on what measures have been taken.

According to this survey, 497 factories—82 per cent have taken different actions against the alleged culprits for violating different human rights such as workplace harassment, problems with overtime and sexual harassment. And 32 per cent of these factories claim that they have these actions written in a statement that is open to the public (Table 28). This fulfils the basic maturity level for the integration and mitigation measures component. In case of different mitigation measures, a verbal warning is the main method followed by factories-93.5 per cent (Table 29); however, given the harassment faced by workers, such verbal warning may be considered relatively weak in some incidences. Strict actions such as fire-from-work (17.32 per cent) and degrading (10.63 per cent) have been taken in a few instances (Table 29).

Table 28: Factories Action on HR Issues in 2019 Reflected in a Written Document

Action taken on HR issues in 2019 and recorded in written document	Yes, for the private view	Yes, for both public and private view	No	Total
Yes	39.64	32.19	28.17	100.00

Source: CPD-Christian Aid Survey, 2021.

Table 29: Types of Action Taken by Factories

Types of Action Taken	Frequency	% (in case of 508)
Discourage them at the organisational level	108.00	21.26
Gradually reduced practices	158.00	31.10
Verbal warning	475.00	93.50
Rebuking	118.00	23.23
Salary/Overtime/Benefit/Bonus cut	146.00	28.74
Degrading	54.00	10.63
Fired from work	88.00	17.32
Others (please specify)	0.00	0.00
Total	1147.00	-

Source: CPD-Christian Aid Survey, 2021.

6.7 Tracking

Companies not only should improve their performance on human rights but should also track their progress over time. This is appreciated by changing the definition and scope of human rights so that companies can understand which avenue to work. This survey found that 383 factories—64 per cent keep a written record of their improvements on human rights in their factories. Out of these 383 factories, 30 per cent of factories had written forms for tracking their human rights records. According to this survey, 45 per cent of factories out of 383 claimed to update their human rights record every year, 40 per cent claimed that they do that every month, and 8 per cent claimed that they update their record of human rights every week (Table 30).

Table 30: Factories Having Written Documents to Update the Database Timely

Recording Human Rights Update	Frequency
Every Day	9 (2.3%)
Every Week	32 (8.4%)
Every Month	154 (40.0%)
Every Year	173 (45.0%)
Do not know	15 (3.9%)
Unknown	220
[1] n (%)	

Source: CPD-Christian Aid Survey, 2021.

6.8 Remedy and Grievance Mechanism

Due to the complex nature of modern companies/enterprises, some impact on human rights may be inevitable. Therefore, companies must have effective remedy and grievance mechanisms. In addition, processes must be in place so that affected persons can get proper remedies. This study found the following picture of factory workers finding the mechanism of lodging complaints and concerns of any adverse human rights impact (Figure 21): 26 per cent to 47 per cent of the factories located in Chattagram, Narayanganj, Dhaka and Gazipur had a public view of their complaints and 31 per cent

Figure 21: Factories Having a Channel or Mechanism for Workers to Raise Complaints and Concerns (Size-wise and Location-wise)
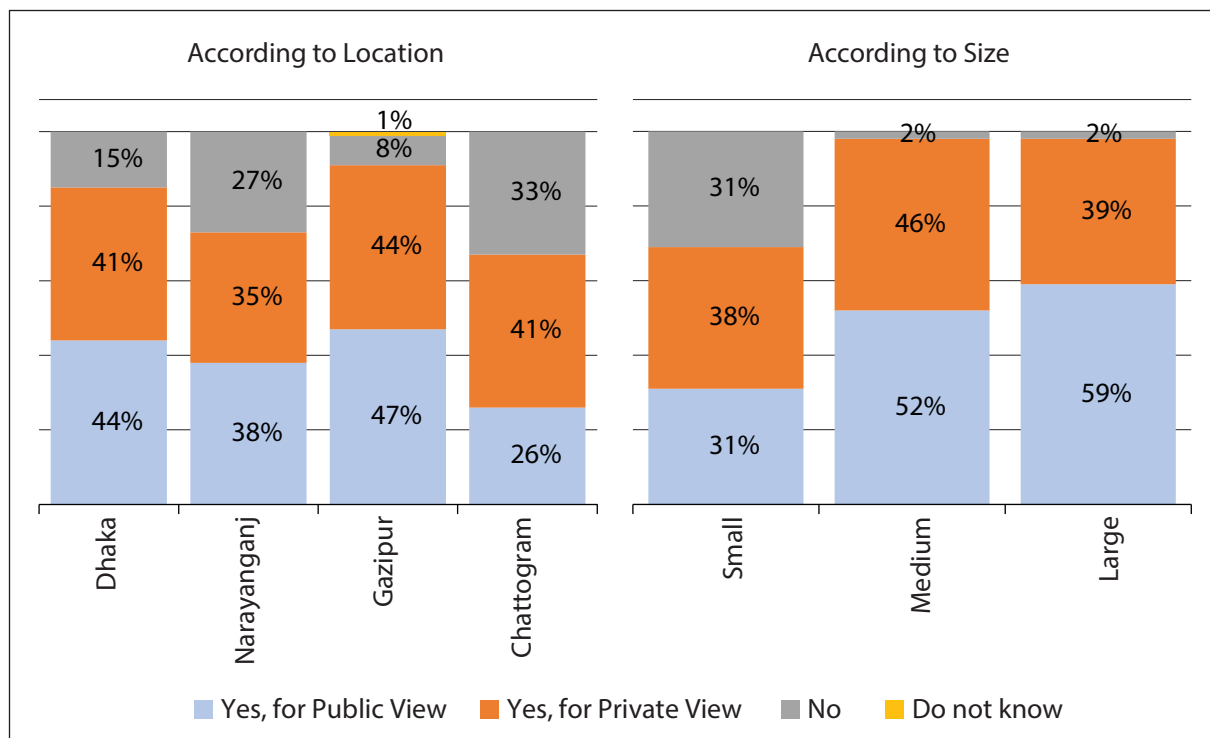
Source: CPD-Christian Aid Survey, 2021.

small type, 52 per cent medium-scale and 59 per cent large factories responded affirmatively to this perspective. The study also found 45 per cent of 419 factories have this in written form that who this person is and how to reach them in case of any adverse human rights impact.

6.9 Cross-cutting Indicators

Cross-cutting indicators of mature reporting consist of three factors. First of all, companies/enterprises must be ready to share their challenges and achievements in their public disclosure. Secondly, a mature statement has to be specific with a concrete example in every sector. That is, only high-level statements will not suffice, a detailed narrative of how the company is improving in human rights and commitments should be available with specific examples. The third factor for cutting edge indicator for mature reporting is that the industrial agencies in question must be forward focusing with a way-ahead vision on its reporting. Figure 22 presents the issues in terms of size and location of sample factories.

Figure 22: Factories Mentioning their Challenges as well as the Achievements in their Statements/Reports on Human Rights Issues (Size-wise and Location-wise)
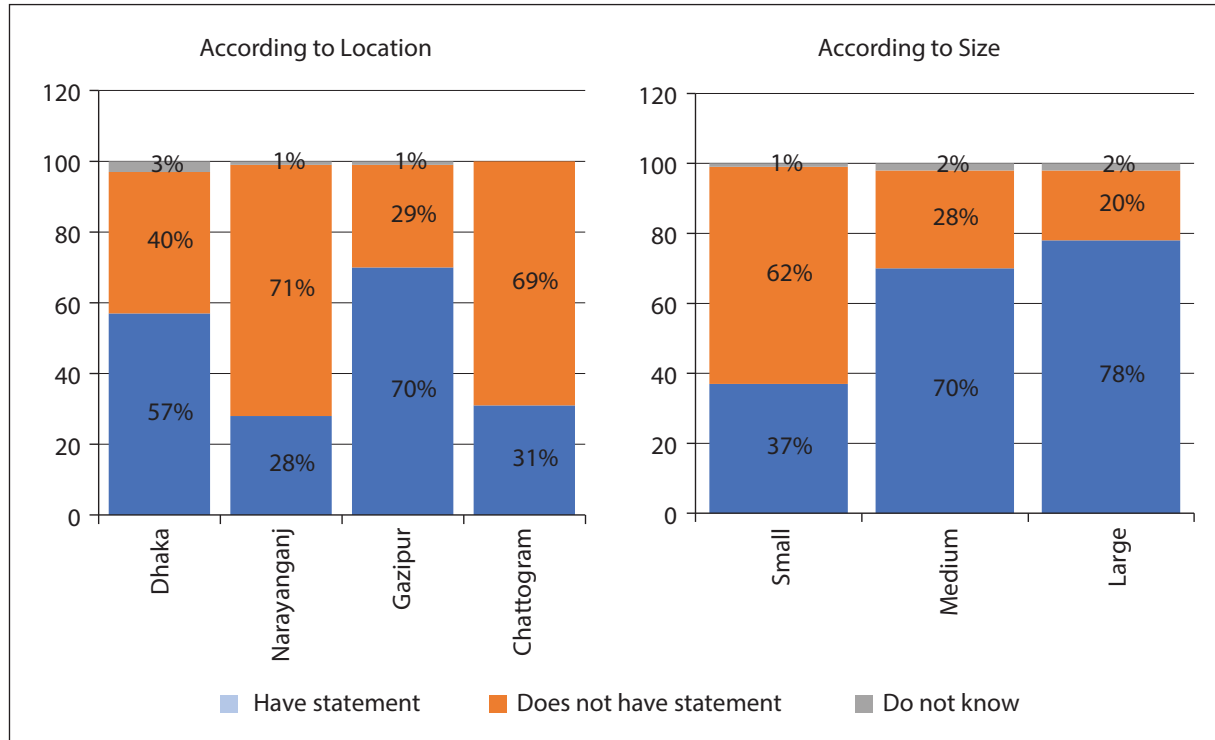
Source: CPD-Christian Aid Survey, 2021.

7. Workers' Perception on Human Rights Practices in RMG Enterprises

Workers' perception of the level of maintenance of human and labour rights in factory operation is critically important to appreciate the extent to which the enterprises comply with their commitment. Since the study has followed the structure of voluntary reporting of enterprises, the perception of sample workers would help to cross-validate voluntary reporting of the sample enterprises on human and labour rights issues. As part of the study, a sample survey of workers had been undertaken involving 600 workers who worked in 200 sample enterprises in Dhaka, Gazipur, Narayanganj and Chattogram area.[15] Sample workers have been asked to respond to two categories of issues – first, their job and livelihoods related issues and second, their experience of human and labour rights practices in the sample enterprises. The first set of issues has been briefly presented in this section- a detailed annex has been attached for further reference. This section highlights workers' experiences of human and labour rights practices in the sample enterprises.

According to the sample survey of workers, the majority of sample workers in the sample factories are female-66.9 per cent, which is slightly higher than the national average of the share of female workers in the garment factories-58 per cent. The average age of the sample workers is 26.6 years 77 per cent of whom are married. These workers attained a different level of academic qualification: 19.30 per cent

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[15]Sample distribution for workers is as follows; 36 per cent from Dhaka, 35 per cent from Gazipur, 18 per cent from Narayanganj and 11 per cent from Chattogram.

sample workers passed grade 5, 19.60 per cent workers passed grade 8 and 10.70 per cent workers passed SSC level. Most of these sampled workers belong to lower grades, grade 6 or 7, in sample factories on contractual terms. Given the qualification, knowledge and experience of working in the garment sector, it is expected that workers are in a position to respond to comments on the level of compliance maintenance in their respective factories relating to workers' rights and human rights issues.

7.1 Workers' Experience in Different Facilities Available in the Sample Factories

7.1.1 Access to Facilities

Basic facilities for workers have yet to be made available across the board in all factories (Table 31). These facilities include maintaining lunch facility, subsidised lunch/free afternoon snacks facility, space for day care/child-care facility, free/subsidized day care/child-care, breastfeeding zone, medical/doctor facility, fair price shop, school for workers children, scholarship for children, maternity leave, maternity leave with salary and casual leave. A large part of factories could not ensure all those facilities for their workers. The survey found about 49.3 per cent of workers are not comfortable working more than 10 hours, and the wages are also below their expectations. Some of the facilities are better in large and medium scale enterprises, such as lunch space, day care space, breastfeeding zones, medical facility, maternity benefit, and casual leave facility (Table 31). Small scale enterprises are relatively behind in terms of day care space, child-care space, fair price shop, children education, maternity benefit with salary, etc. Workers are deprived of some of the facilities across all categories of enterprises, including free lunch, free tiffin, fair price and school stipend for workers' children.

Table 31: Workers' Perception on Access to Basic Facilities in their Factories

Characteristic	Small (1-500 Workers), N = 386[1]	Medium (501-2500 Workers), N = 162[1]	Large (More than 2500 Workers), N = 44[1]
Space for Lunch/Dining facility	313 (81.0%)	159 (98.0%)	42 (95.0%)
Free Lunch	5 (1.3%)	4 (2.5%)	3 (6.8%)
Free Tiffin	101 (26.0%)	57 (35.0%)	16 (36.0%)
Space for Day Care/Childcare	87 (23.0%)	105 (65.0%)	32 (73.0%)
Free/subsidized Day Care/ child care	21 (5.4%)	36 (22.0%)	18 (41.0%)
Breastfeeding zone	118 (31.0%)	111 (69.0%)	34 (77.0%)
Medical/Doctor facility	236 (61.0%)	150 (93.0%)	44 (100.0%)
Fair Price Shop	11 (2.8%)	17 (10.0%)	15 (34.0%)
School for Workers Children	3 (0.8%)	14 (8.6%)	8 (18.0%)
Scholarship for Children	3 (0.8%)	14 (8.6%)	12 (27.0%)
Maternity Leave	208 (54.0%)	113 (70.0%)	43 (98.0%)
Maternity Leave with Salary	140 (36.0%)	103 (64.0%)	32 (73.0%)
Casual Leave	249 (65.0%)	96 (59.0%)	29 (66.0%)
None of the above	12 (3.1%)	0 (0.0%)	0 (0.0%)

Source: CPD-Christian Aid Survey, 2021.
Note: [1]n (%).

7.1.2 Operation of Participation Committees

Majority of workers indicated that their factories have Participation Committees (PC)/Welfare Committees (WC). However, it is important to note that more than one-third of the total workers indicated that their sample factories do not have any worker-related committees. About 33.83 per cent of workers indicated that factories have Anti-harassment Committees (Table 32) . However, the presence of various committees does not necessarily ensure regular operation and activities under those committees. More importantly, even the operation of those committees does not ensure that workers' welfare would be fulfilled according to the requirement.

Table 32: Factories with Different Committees Membered by Workers

Option	Participation Committee	Worker Welfare Committee	Anti-harassment Committee	Others (please specify)	None of the above
% of workers confirming the existence of any of the following committees (in case of 606 workers)	47.19	30.69	33.83	2.97	34.32
% of workers confirming membership in the following committees (in case of 398 workers)	14.07	8.79	8.29	2.26	76.38

Source: CPD-Christian Aid Survey, 2021.

These Workers Committees do not perform their regular activities. Workers who mentioned that factories have PCs, about 35 per cent of them said the meeting was held within last one month; while about 25 per cent said that three months took to convene last Participation Committee meeting. And about 39 per cent of the workers said they did not know when the last meeting was held in their factory. Asked if they or their colleagues raised a complaint in the PC meeting, about 20 per cent of workers said 'yes', while 63 per cent replied 'no' and 17 per cent said they did not know. When asked whether these complaints were addressed, 98 per cent of workers said those were addressed, and only 2 per cent said they were not. Overall, there is an impression that the committees are yet to be present and functional across the factories. The limited positive response indicates that some of those committees have been in operation but only in a few factories.

7.1.3 Workers' Workplace Related Concerns

The incidence of different forms of harassment in the workplace is still a major concern. It appears from the response of the sample workers that the issue of sexual harassment is not a major concern at the workplace. However, different kinds of workplace-related harassment are still a major concern. This can be deduced in three ways: first, this result is categorically true; sexual harassment is very low in the RMG sector; second, respondents were not aware of what constitutes sexual harassment; and thirdly, they did not want to disclose this information even if it had been an enabling situation to report. A total of 104 workers-17 per cent said they faced either verbal or physical harassment within the factory. The rest of the workers said they did not face it (Table 33). Out of those 104 workers, 72.12 per cent were harassed by line supervisors, 21.15 per cent by Officers and 25 per cent by co-workers. It is important to note that workplace harassment concerns both male and female workers (Table 34).

Table 33: Workers' Response About Work-related Harassment

Workers Facing Work-related Harassment (verbal/physical) from the following	Frequency	% (In case of 124)	% (In case of 104)
Line Supervisors	75.00	60.48	72.12
Officers	22.00	17.74	21.15
Co-workers	26.00	20.97	25.00
Others	1.00	0.81	0.96
Total	124.00	100.00	119.23

Source: CPD-Christian Aid Survey, 2021.

Table 34: Workers Facing Work-related Harassment (Gender-wise)

| Gender	Workers Facing Work-related Harassment (Verbal/Physical)		Total
	Yes	No	
Female	69.00	337.00	406.00
%	17.00	83.00	100.00
Male	35.00	165.00	200.00
%	17.50	82.50	100.00
Total	104.00	502.00	606.00
%	17.16	82.84	100.00

Source: CPD-Christian Aid Survey, 2021.

7.2 Workers' Perception About Human Rights Practice in Factories

This sub-section examines whether the claim of factory administrators to have well attended to the labour and human rights issues matches with the response made by the workers of the same factories and the overall performance of different factories. First of all, for many factories, the claim of the high number of public statements on human rights is based on posters in the factory. A total of 448 workers-74 per cent recalled that they had seen posters inside or outside the factory that had some sort of statement on human rights (Figure 23). In consideration of posters carrying HR statements in the factory, survey findings based on 200 factories reveal that 151 factories, i.e., 75.50 per cent had posters containing human rights perspective and that 49 factories, i.e., 24.50 per cent, did not have any poster or workers didn't recall there was any poster as such. Hence, the claim made by factories regarding disclosure on human rights among the workers is largely the same claimed by factories and seen by the workers.[16] As with the enterprise survey, the workers' survey also presents the same result when it is categorised according to the factories' membership.

When this result is compared amongst the factories by location, Figure 23 above shows that maximum workers from Gazipur, as high as 84 per cent, have reportedly seen posters inside their factories. Second comes Chattogram, third Dhaka, and in Narayanganj, only 46 per cent of workers replied positively regarding the posters on human rights inside the factory.

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[16]As described earlier, for each factory 3 workers were inquired and if there was any discrepancy among the response of the workers of same factory then answer is chosen described by majority workers.

Figure 23: Factories Mentioning their Challenges as well as the Achievements in their Statements/Reports on Human Rights Issues (Size-wise and Location-wise)
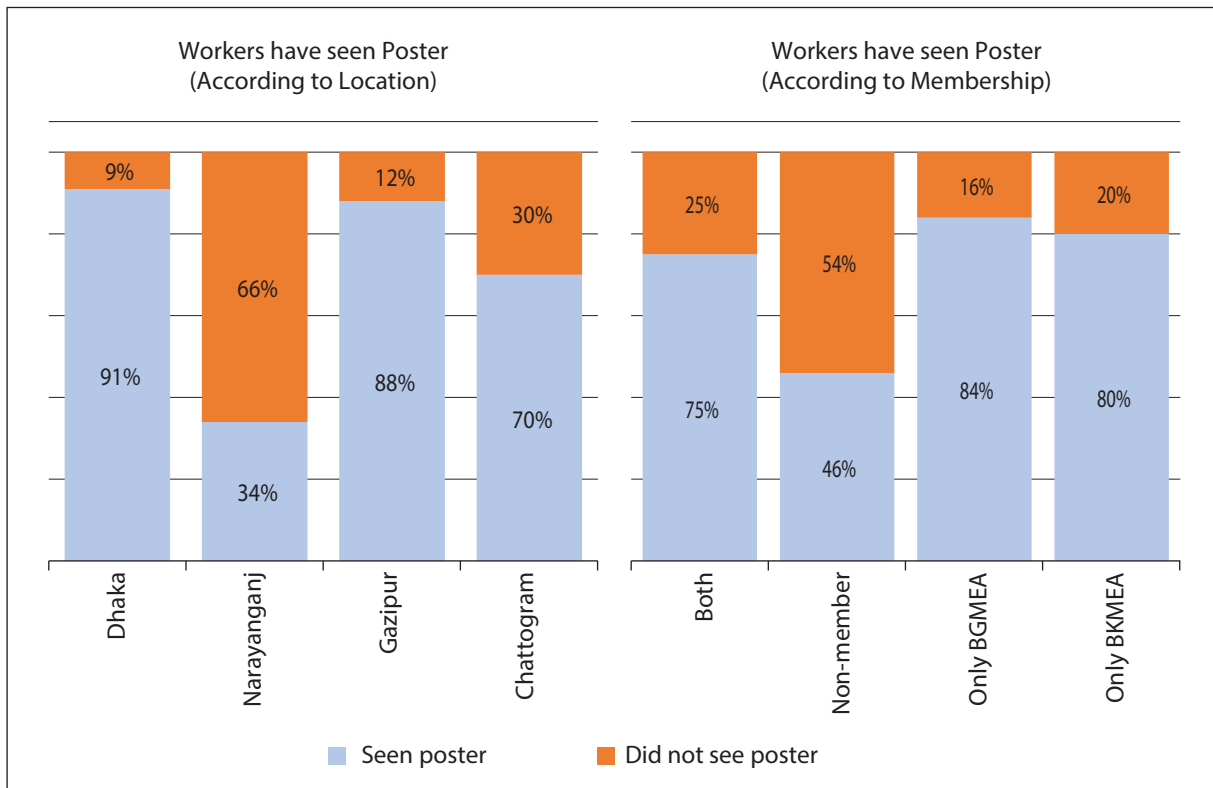
As many as 395 workers-88 per cent out of 448 said they had read the posters containing some human rights issues. Amongst those reading these posters, 265 workers, i.e., 59 per cent, informed that the posters were only in Bangla, and 183 of them-41 per cent found them in both English and Bangla. From the perspective of the factory, workers of 68 per cent of factories have confirmed to have read the poster, but workers of 32 per cent of factories have reportedly not read the posters.

Now comes the next logical question: which issues of human rights do those posters contain? Figure 24 shows 91 per cent of workers found the posters containing issues relating to child labour. Workplace harassment, sexual harassment, living wage and maternity benefit were projected in the posters, according to more than 50 per cent of workers. However, important issues relating to "layoff and retrenchment" and "collective bargaining" were seen there by just 8.70 and 16 per cent of the workers, respectively. Overall, the responses are consistent with what factory management claimed about the issues highlighted in the human rights-related posters.

Workers were asked whether child labour is a major concern for the surveyed factory management; almost all workers-97 per cent mentioned that child labour is not an issue of concern for the factories. Despite that, child labour is still found in a few factories (1.50 percent of total workers) which spreads across all four clusters.

Figure 24: Workers' Observation Regarding Issues Highlighted in the Poster (N = 606)
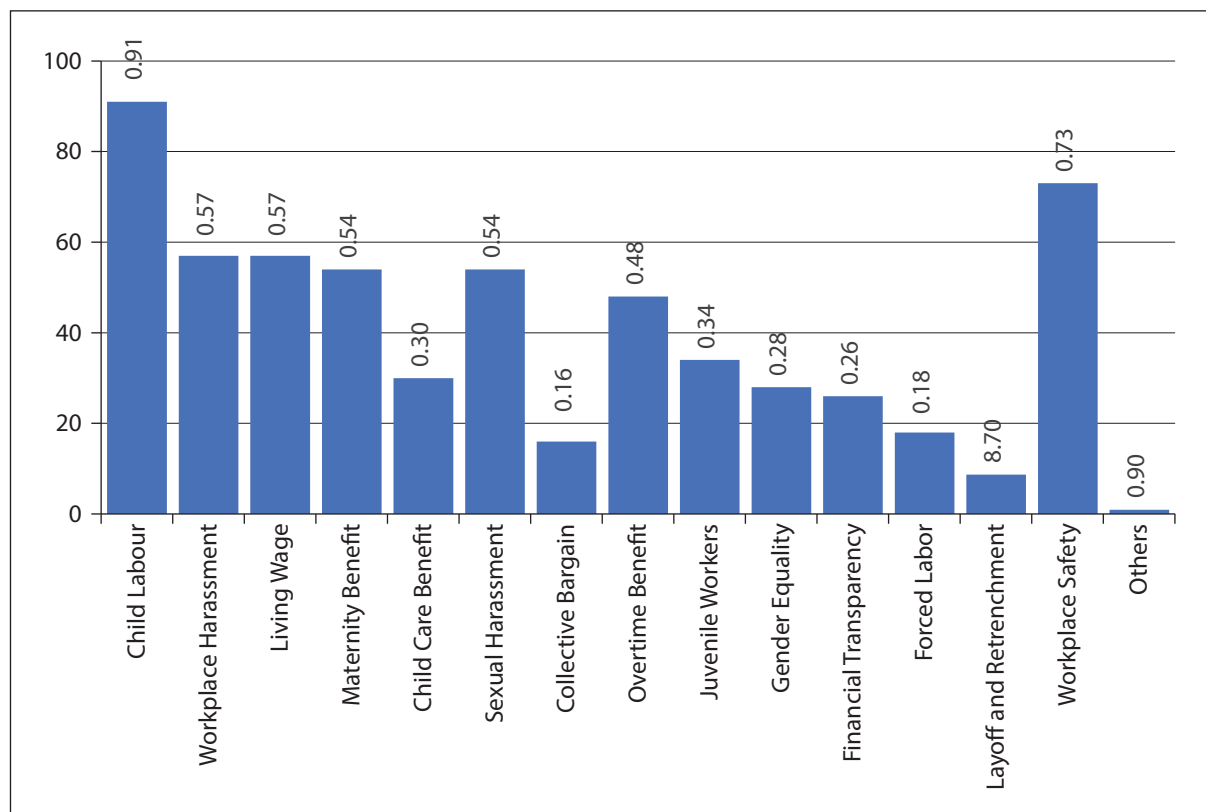
Source: CPD-Christian Aid Survey, 2021.

Workers across regions received in-house training on different human and labour rights issues. However, 35 per cent of workers claimed that they had received in-house training while male workers claimed to have received training slightly more than female workers: 39 per cent vs 33 per cent. Interestingly, the proportionally higher share of workers in Narayangonj-62.26 per cent and Chattogram-42.86 per cent received more in-house training compared to other regions (Table 35).

Table 35: Workers Receiving Any Kind of In-house Training (Location-wise)

Area	Received any kind of In-house Training (In percentage)		
	Affirmative	**Negative**	**Total**
Dhaka (N=161)	29.19	70.81	100.00
Narayanganj (N= 53)	62.26	37.74	100.00
Gazipur (N=178)	29.78	70.22	100.00
Chattogram (N=56)	42.86	57.14	100.00
Total (N=448)	35.04	64.96	100.00

Source: CPD-Christian Aid Survey, 2021.

In terms of in-house training on different human and labour rights issues, most workers who received training-157 out of 606 mentioned that training was mainly provided on child labour—48 per cent of 157 workers, workplace harassment—52 per cent and workplace safety issues—85 per cent. Table 36

presents the issues highlighting in-house training. The training on other related issues such as living wages, maternity benefits, sexual harassment, overtime benefits etc., were discussed at a modest level. However, some of the issues did not get priority in the training events, such as collective bargaining-5.1 per cent, gender equity-18 per cent, forced labour-13 per cent and lay-off and retrenchment-14 per cent. This reflects the factories providing workers training on those issues that took to be their priority areas on human and labour rights issues.

There are variations among factories in terms of providing training to workers: large and medium scale factories appear to provide more training to their workers than small scale factories. While some of the issues get priority or less priority at a similar level in the case of training to workers across all categories of factories, there are differences in case of prioritisation, particularly in small scale factories. For example, our survey does not find workers of small-scale factories to have received training on such issues as maternity benefit, child-care benefit and force labour use. Similarly, small scale factories not affiliated with BGMEA and/or BKMEA attach less priority on the above-mentioned issues. The membership-based analysis indicates that BGMEA-member factories are better in terms of providing training compared to that of BKMEA-member factories. Overall, the management provides training on the issues that get priority in the posters published for workers and do not offer training on issues for which the disclosure policy of the factories do not attach any priority.

Table 36: Human Rights Issues Factories Attaching the Most Priority (Size-wise)

Issues	Small (less than 500 Workers), N = 386[1]	Medium (501-2500 Workers), N = 162[1]	Large (More than 2500 Workers), N = 44[1]
Child Labour	341 (88%)	158 (98%)	43 (98%)
Workplace Harassment	237 (61%)	131 (81%)	29 (66%)
Living Wages	249 (65%)	141 (87%)	33 (75%)
Maternity Benefit	184 (48%)	122 (75%)	37 (84%)
Child-care Benefit	71 (18%)	82 (51%)	27 (61%)
Sexual Harassment	219 (57%)	122 (75%)	31 (70%)
Collective Bargaining	46 (12%)	31 (19%)	12 (27%)
Overtime Benefit	220 (57%)	109 (67%)	30 (68%)
Juvenile Workers	120 (31%)	54 (33%)	22 (50%)
Gender Equality	126 (33%)	78 (48%)	28 (64%)
Financial Transparency	100 (26%)	58 (36%)	21 (48%)
Forced Labour	48 (12%)	43 (27%)	14 (32%)
Layoff and Retrenchment	36 (9.3%)	29 (18%)	5 (11%)
Workplace Safety	301 (78%)	143 (88%)	35 (80%)
All of the above	1 (0%)	0 (0%)	0 (0%)

Source: CPD-Christian Aid Survey, 2021.

7.3 Grievance Mechanism in Factories

Factories must place a grievance mechanism and remedy system since running a business might inadvertently put people/staff/workers at a disadvantageous position. Further, the mere availability of such a system or mechanism in factory operation is not enough. It should be well known to workers, too, and they must know how to use this system. This section reveals workers knowledge and experience of grievance mechanisms within their respective factories.

Majority of factory workers, 89.6 per cent of total enterprises, claimed that grievance mechanism in the workplace is not unknown to them. However, very few workers used the mechanism; only 12.70 per cent of the workers claimed to have used the grievance system. Table 37 presents the types of complaints made by workers. Majority of the complaints raised by the workers are related to verbal harassment, 82.61 per cent; besides, there are other complaints such as the problem of salary, 26.09 per cent and overtime work and the related payment, 21.0 per cent, etc. The workers who reported having grievance mechanisms in factories mentioned that 41.3 per cent of workers claimed to have a discussion with the Officials or department to resolve these complaints. These officials/departments are easily accessible, and the majority of workers have limited complaints about these issues. However, in most cases, workers do not make formal complaints: only 8.42 per cent of workers indicated about the formal complaint mechanism. An informal way of finding a solution to the grievances bears merit, but at the same time, this should not be encouraged in all types of complaints.

Table 37: Types of Complaints Reported by Workers

Types of Reported Complaint	Frequency	% (In case of 113)	% (In case of 69)
Verbal Harassment	57.00	50.44	82.61
Physical Harassment	9.00	7.96	13.04
Sexual Harassment	5.00	4.42	7.25
Extra Work	15.00	13.27	21.74
Problems with Salary/Overtime Payment	18.00	15.93	26.09
Harassment from Co-workers	7.00	6.19	10.14
Others (please specify)	2.00	1.77	2.90
Total	113.00	100.00	163.77

Source: CPD-Christian Aid Survey, 2021.

In case of undertaking actions against complaints lodged by the workers, factory management reached a solution through negotiation in the majority of cases, 75.5 per cent and through verbal warnings in 86.30 per cent cases (Table 38). Other measures include salary deduction- 17.20 per cent, degrading the position- 6.12 per cent, sacking from work- 20.41 per cent, and even informing law enforcement agencies- 1.46 per cent. Interestingly, in a few cases- 6.71 per cent, the management has been found to take action against those who had complained, which might be the case of a false allegation made against someone. In a number of incidences, say about 10 per cent, workers lodged their complaints at the Association level (BGMEA or BKMEA). However, workers still do not find that management-worker interactions are as regular as they should be. Relatively higher-level interaction between management and workers is observed in case of factories located in Gazipur and Dhaka, while less interaction is reported in factories located in Narayanganj and Chittagong clusters (Table 39).

Table 38: Factory Administration Response Following Complaints

Administration Response	% (In case of 343)
Reached solution through negotiation	75.51
Verbal warnings	86.30
Salary deduction	17.20
Degrading the position	6.12
Sacked from employment	20.41
Informing Law Enforcement Agencies	1.46
Action against the worker(s) lodging complaint	6.71
Others (please specify)	0.00
Total	213.70

Source: CPD-Christian Aid Survey, 2021.

Table 39: Regular Interaction of the Factorise with Workers to Know About their Grievances (Location-wise)

Location	Factories regularly organize Meeting with Workers to know about their Grievances (in percentage)			Total
	Yes	No	No Idea	
Dhaka (N=161)	56.54	31.31	12.15	100.00
Narayanganj (N= 53)	41.07	45.54	13.39	100.00
Gazipur (N=178)	67.30	20.38	12.32	100.00
Chattogram (N=56)	23.19	55.07	21.74	100.00
Total (N=448)	53.63	32.84	13.53	100.00

Source: CPD-Christian Aid Survey, 2021.

A major grievance mentioned by the workers was that they were deprived of the benefits they were entitled to on account of lay-off or retrenchment during the pandemic. According to the survey, about 3.60 per cent of the total sample workers were retrenched during the pandemic. However, the majority of workers complained about the denial of entitled benefits during the lay-off and/or retrenchment process. As per the BLA rules, the management requires to provide three months advance notice in case of retrenchment of permanent workers. However, 32.70 per cent of sample workers mentioned that the management did not provide any advance notice while laying off workers; 44.70 per cent of workers, however, confirmed to have received one month notice period (Table 40) . Only 6.27 per cent of workers mentioned that their factories provided three months' notice in case of laying off workers. Thus, the majority of workers complained about inadequate compliance mechanisms in the case of laying-off workers as per the Labour Act and Labour Rules.

Table 40: Information Regarding Lay-off by Factories

	Issues	Frequency in %
Advance notice provided by the factory before laying off workers	No advance notice	198 (32.67%)
	1 month	271 (44.72%)
	2 months	99 (16.34%)
	3 months	38 (6.27%)

(Table 40 contd.)

(Table 40 contd.)

	Issues	Frequency in %
Payment of salary by month(s) to the workers as compensation prior to applying lay-off option	No salary	273 (45.05%)
	1 month of salary	254 (41.91%)
	2 months of salary	52 (8.58%)
	3 months of salary	27 (4.46%)
	Others (Please Specify)	0

Source: CPD-Christian Aid Survey, 2021.

7.4 Discrete Choice Experiment (DCE) on Workers

One of the prime objectives of this research has been to identify the interventions required to be undertaken to improve the practice of business and human rights issues in adherence with the UNGPs. In order to fulfil that goal, it is important to know about the preference of workers. Because without knowing the preference of workers, a paternalistic policy implementation may only hurt the workers. This section finds out the job attribute preference of workers using the DCE method.[17] Detailed methodology is presented in Annex 1.

Table 41 shows coefficients from the conditional logistic model for the total workers from the survey. Here, the alternative specific constant is -0.091. For the child-care centre, base level is no child-care. Therefore, a job providing for child-care increases utility for the workers. Similarly, "no medical facility" as part of job condition decreases the same utility of the workers compared to the availability of the medical facility for them; but, this is not statistically significant. Therefore, it cannot be stated statistically that the provision of a medical facility increases workers utility compared to its non-availability. Again, workers prefer free lunch to the condition where the benefit is not available; the perspective does not, however, evince any statistical difference. For example, verbal harassment is always disliked by the workers and decreases their utility in productivity. Likewise, workers utility expands where there is no digital payment as because they do not prefer digital payment. Wage here represents the willingness to accept. As this is positive, it means as wage increases, the utility also increases.

Table 41: Results of DCE on All Workers

Alternative Specific Constant	-0.091[**] (0.037)
Provision of Child-care Centre	0.512[***] (0.048)
No Medical Facility	-0.126 (0.082)
Free Lunch or Snacks	0.098 (0.072)
Verbal Harassment	-0.306[***] (0.068)
No Digital Payment	0.200[***] (0.066)
Wages	0.0002[***] (0.00001)
Observations	7,272

Source: CPD-Christian Aid Survey, 2021.

Note: [*]p<0.1; [**]p<0.05; [***]p<0.01

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[17]To find out the preference of job attributes by workers, this study conducted a discrete choice experiment. The discrete choice experiment is based on the random utility model (RUM). This model posits that choosing an alternate option from a collection of options provides a particular degree of utility to the individual.

From the last table above, workers preferences in job attributes are shown. Now, we focus on worker's willingness to accept different job attributes (Table 42) . First and foremost, factory workers will forego BDT 2,672/- from their wages for a child-care centre in their workplace. Similarly, they would leave a workplace by sacrificing BDT 1,599/- if the management of that factory torments them with verbal harassment. Workers do not care for BDT 1599/- as much as they prefer a factory free from such bad dispensation as verbal harassment. Interestingly workers will accept the digital payment of their wages if they are offered BDT 1042/- more. In other words, digital payment is not yet considered comfortable to workers as a payment mode due to different types of inconveniences. However, as having a medical facility and free lunch and snacks do not significantly differ from their base, there is no meaning for these two marginal willingness to pay.

Table 42: Estimated Workers Willingness to Accept (WTA) Job Attributes

	MWTA	2.5%	97.5%
Alternative Specific Constant	474	79	886
Provision of child-care Centre	-2,673	-3,241	-2,175
No Medical Facility	657	-156	1,536
Free Lunch or Snacks	-510	-1,239	228
Have Verbal Harassment	1,599	926	2,400
No Digital Payment	-1,042	-1,733	-299

Source: CPD-Christian Aid Survey, 2021.

Like female workers, male workers do also feel concerned significantly for child-care facilities and wage rate as it increases their utility; whereas neither the medical facility nor verbal harassment comes in the way of their productivity and utility. Male workers are willing to give away BDT 2,482/- wage if the factory provides a child-care facility and would charge the factory with less wage of Tk. 1022 for having verbal harassment (Table 43).

Table 43: Results of Conditional Logit (CL) Model of DCE Data for Female and Male Workers

	Female	Male
	(1)	(2)
Alternative Specific Constant	-0.152***	0.034
	(0.045)	(0.063)
Provision of Child-care Centre	0.529***	0.481***
	(0.058)	(0.083)
No Medical Facility	-0.120	-0.145
	(0.101)	(0.143)
Free Lunch or Snacks	0.131	0.030
	(0.088)	(0.124)
Have Verbal Harassment	-0.360***	-0.198*
	(0.083)	(0.116)
No Digital Payment	0.218***	0.165
	(0.080)	(0.114)

(Table 43 contd.)

(Table 43 contd.)

	Female	Male
	(1)	(2)
Wages	0.0002***	0.0002***
	(0.00001)	(0.00002)
Observations	4,872	2,400

Source: CPD-Christian Aid Survey, 2021.

Note: *p<0.1; **p<0.05; ***p<0.01

Table 44 and 45 examines the coefficient from the conditional logistic model for female and male workers. It can be observed that like all workers, the provision of child-care, free lunch, no digital payment system, and higher wages enhance female workers utility. In contrast, no medical facility and verbal harassment in the workplace decline their utility since female workers might face any kind of accident and/or harassment telling on their mental health. On the other side, if the factories provide for child-care and stay away from the digital payment system, female workers would be willing to receive BDT 2765/- and BDT 1139/- less in their new workplace. It indicates that a child-care centre is very important for a female worker (Table 44). Moreover, female workers would change their workplace if factories had the problem of verbal harassment even with lower wages.

Table 44: Estimated Willingness to Accept (WTA) Job Attributes for Female Workers

	MWTA	2.5%	97.5%
Alternative Specific Constant	796.526	332.704	1,309.421
Provision of Child-care Centre	-2,765.139	-3,446.652	-2,176.613
No Medical Facility	626.093	-457.673	1,723.020
Free Lunch or Snack	-683.800	-1,647.315	280.168
Have Verbal Harassment	1,884.643	1,016.378	2,911.531
No Digital Payment	-1,139.200	-1,981.177	-280.011

Source: CPD-Christian Aid Survey, 2021.

Table 45: Estimated Willingness to Accept (WTA) Job Attributes for Male Workers

	MWTA	2.5%	97.5%
Alternative Specific Constant	-173.263	-872.122	521.916
Provision of Child-care Centre	-2,482.897	-3,393.200	-1,655.244
No Medical Facility	748.510	-657.217	2,372.041
Free Lunch or Snack	-155.912	-1,425.932	1,209.267
Have Verbal Harassment	1,022.451	-84.453	2,413.380
No Digital Payment	-851.084	-2,033.310	397.364

Source: CPD-Christian Aid Survey, 2021.

Table 46: Results of Clogit Model of DCE data (for Marital issue and Children of Workers)

	Mean Coefficient			
	Married Worker	**Unmarried Worker**	**With Children**	**No Children**
Alternative Specific Constant	-0.128***(0.042)	0.018 (0.074)	-0.074*(0.043)	-0.136*(0.070)
Having Child-care Centre	0.531***(0.055)	0.477***(0.096)	0.509***(0.056)	0.522***(0.091)
No Medical Facility	-0.087 (0.095)	-0.230 (0.169)	-0.133 (0.097)	-0.102 (0.153)
Free Lunch or Snack	0.061 (0.083)	0.252*(0.146)	0.144*(0.085)	-0.016 (0.135)
Verbal Harassment	-0.353***(0.077)	-0.199 (0.146)	-0.281***(0.081)	-0.373***(0.125)
No Digital Payment	0.278***(0.076)	-0.021(0.139)	0.208***(0.078)	0.190 (0.123)
Wages	0.0002***(0.00001)	0.0001***(0.00002)	0.0002***(0.00001)	0.0002***(0.00002)
Observations	5,628	1,644	5,208	2,064

Source: CPD-Christian Aid Survey, 2021.

Note: *p<0.1; **p<0.05; ***p<0.01

For married workers, there are significant differences in having child-care, no digital payment, and wages as all of these issues increase their utility if any of the indicators (Table 46). Medical facilities and free lunches might not matter much for the workers, but "verbal harassment" decreases their utility significantly. Table 47 indicates that married workers are willing to accept the job for BDT 3,842/- lesser wage if there have a child-care centre facility and no digital payment system in their workplace, while they need BDT 1,674/- more wages for verbal harassment. On the other side, non-married workers utility differs significantly and increase utility for child-care facility and free lunch and wages, respectively. Other factors do not have any significant relationship with their utility. Table 46 shows that non-married workers are highly concerned about the child-care centre as most of them are intended to get married very soon and are willing to accept the facility of child-care centre at BDT 3,451/- lower wages in the factories.

The study examines those workers who have children: their utility is significantly dependent on the childcare facility, free lunch, status of verbal harassment and wages. All the issues increase their utility except the verbal harassment. Moreover, it shows the willingness to accept the job of workers who have a child. They are willing to give way the highest amount of BDT 2,670/- for childcare centres whereas BDT 1,846/- for free lunch and no digital payment.

Again, the workers having no child, their utility also increased and have a significant relationship with the childcare centre and wage as they are planning to have a child or at the primary stage of pregnancy. Also, they are not concerned about the free lunch, medical facility, and digital system as these have no significant difference for the concerned workers. But the workers who have no child need additional wages worth BDT 1,920/- to tackle verbal harassment because they are concerned about it. They are also willing to go for BDT 2,686/- fewer wages for having childcare centres at the factories.

Table 48 above shows that all workers with a given education level have significantly positive and intimate bondage with their utility and child-care facility, whereas verbal harassment declines their

utility. For medical facilities, workers having higher secondary education are concerned about that. On the other side, workers with secondary and higher secondary education levels do not want any kind of digital payment system as it declines their utility as well as wages.

Table 47: Estimated Willingness of the Workers to Accept (WTA) Job Attributes Referring to Marital Status and Children

	MWTA for Married Workers	MWTA for Unmarried Workers	MWTA for Workers having Children	MWTA for Workers having Children
Alternative Specific Constant	607.570	-129.140	390.563	697.165
Having Child-care Centre	-2,521.135	-3,451.943	-2,670.013	-2,686.244
No Medical Facility	412.993	1,662.335	699.056	525.010
Free Lunch or Snack	-287.418	-1,827.039	-757.802	80.775
Verbal Harassment	1,674.873	1,443.150	1,473.743	1,920.717
No Digital Payment	-1,321.366	149.795	-573.929	-978.591

Source: CPD-Christian Aid Survey, 2021.

Table 48: Results of Clogit Model of DCE Data by Education Level of the Workers

	Mean Coefficient		
	Primary Level	Secondary Level	Higher Secondary Level
	(1)	(2)	(3)
Alternative Specific Constant	-0.006 (0.092)	-0.118**(0.046)	-0.068 (0.082)
Having Child-care Center	0.436***(0.123)	0.511***(0.060)	0.593***(0.106)
No Medical Facility	-0.148 (0.206)	-0.057 (0.104)	-0.363**(0.185)
Free Lunch or Snack	0.293 (0.182)	0.151*(0.091)	-0.222 (0.157)
Verbal Harassment	-0.450**(0.176)	-0.288***(0.084)	-0.281*(0.151)
No Digital Payment	-0.105 (0.168)	0.255***(0.082)	0.261*(0.147)
Wages	0.0001***(0.00003)	0.0002***(0.00001)	0.0002***(0.00002)

Source: CPD-Christian Aid Survey, 2021.

Note: $^*p<0.1$; $^{**}p<0.05$; $^{***}p<0.01$

Furthermore, all the workers in every education level are concerned about their children's safety and security because each worker from primary, secondary and higher secondary levels is willing to forego BDT 3,656/-, BDT 2,436/- and BDT 3,018/- respectively for the child-care facility (Table 49). Besides, the primary education level worker asks for the highest additional wage, BDT 3,771/-, for verbal harassment, and secondary and higher secondary education level workers demand BDT 1,372/- and BDT 1,430/- respectively for the same purposes.

Table 49: Estimated Willingness to Accept (WTA) Job Attributes by the Education Level of Workers

	MWTA for Workers with Primary Education	MWTA for Workers with Secondary Education	MWTA for Workers with Higher Secondary Education
Alternative Specific Constant	52.650	561.420	347.902
Having Child Care Centre	-3,656.128	-2,436.250	-3,018.182
No Medical Facility	1,242.723	269.296	1,847.586
Free Lunch or Snacks	-2,458.494	-717.251	1,130.307
Verbal Harassment	3,771.380	1,372.100	1,430.047
No Digital Payment	881.756	-1,215.789	-1,330.046

Source: CPD-Christian Aid Survey, 2021.

**Note:** *p<0.1; **p<0.05; ***p<0.01

8. Level of Progress of Practicing UNGPs in the RMG Sector

This section presents the level of maturity, mostly at the level of infancy, of factory adherence to the UNGPs standard. As discussed in the methodology section, the UNGPs maturity index has been applied based on Shift Index to estimate the factories' level of adherence. The index estimates the maturity for eight different categories of compliance issues: (i) human rights policy commitment, (ii) governance and embedding, (iii) identification of risks, (iv) shareholders engagement, (v) assessing human rights risks, (vi) mitigation measures, (vii) tracking and (viii) remedy and grievances. The level of maturity on overall and sub-indices have been divided in four different categories: 'negligible' if the index-value is less than 1; 'elementary' if the index-value is between 1 and 2; 'improving' if the index-value is between 2 and 3; 'established' if the index-value is between 3 and 4; and 'matured' if the index value is between 4 and 5.

8.1 Overall Performance of UNGPs Practices

Based on the analysis of different indicators relating to different sub-indices, the overall progress of the Bangladesh RMG sector in terms of UNGPs is still below the 'elementary' level, i.e., at 'negligible' level (Figure 25). Among the eight sub-indices, neither of them reached the 'matured' state; however, marginal progress is observed in case of 'governance and embedding' where about 3 per cent of factories are found at the state of 'established' category. The level of 'improvement' is observed at a modest level for a small share of factories, involving such components as governance and embedding (5 per cent factories), prioritisation of risks and identification of human rights risks (4.70 per cent), integration and mitigation measures (2 per cent) and stakeholder engagement (1.30 per cent). A large section of factories is at 'elementary' level in some other indicators such as human rights policy priorities (44.30 per cent of factories), prioritisation of risks and identification of human rights issues (33.30 per cent), assessing human rights risks (32.80 per cent), remedy and grievance mechanism (31.70 per cent) and integration and mitigation measures (31.80 per cent). Majority of factories are at the 'negligible' state: of these, the most negligible state of factories is found in case of stakeholder engagement (79.80 per cent) followed by tracking (70.60 per cent), remedy and grievance mechanism (68.30 per cent) and assessing human rights risks (67.20 per cent). Overall, the institutionalisation of human rights practice is yet to be fair in the operational mechanism of the factories.

Figure 25: Components of the Responsibility to Respect Human Rights
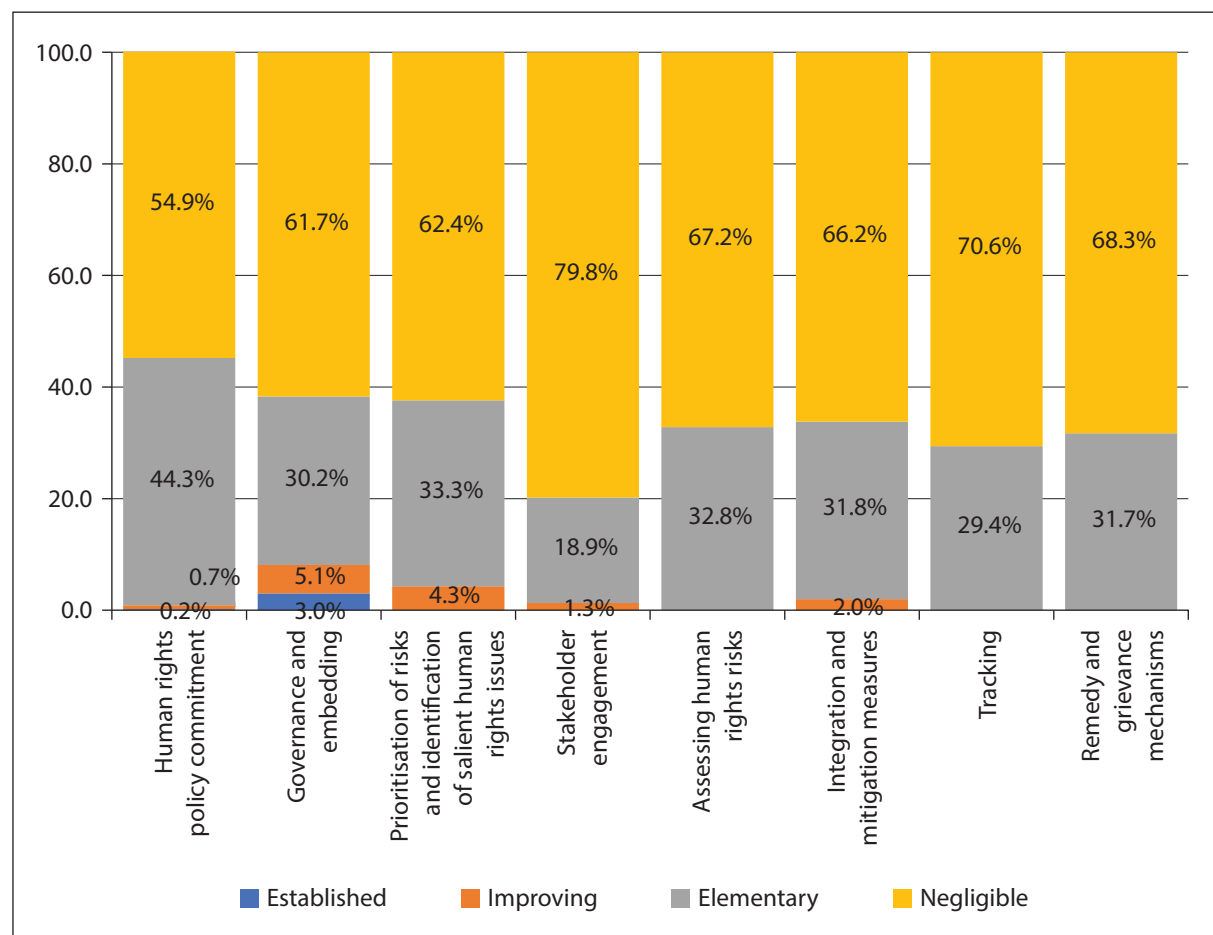
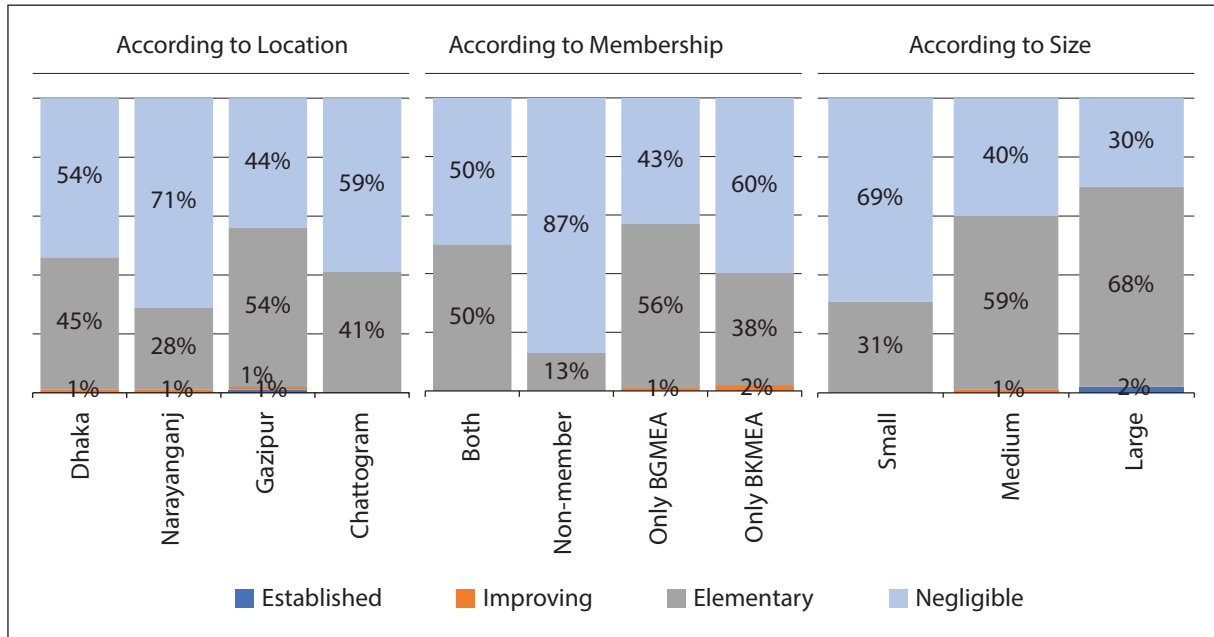**Source:** CPD–Christian Aid Survey, 2021.

8.2 Component-wise Performance of UNGPs Practices for Different Categories of Factories

The component-wise performance analysis has been carried out in terms of size, location and membership of factories. Such a disaggregated analysis will help to undertake targeted operational measures for different categories of factories.

8.2.1 Human Rights Policy Commitment

Human Rights commitments are relatively better (Figure 26) : an elementary state in case of large and medium-sized enterprises, 67 per cent and 59 per cent respectively; factories located in Gazipur and Dhaka reading 54 per cent and 45 per cent respectively and factories affiliated with BGMEA and partly those of BKMEA showing 56 per cent and 38 per cent respectively. Some of the factories located in Dhaka and Gazipur have reached the level of an 'established' state. Majority of small-scale factories-69 per cent, factories located in Narayangonj-71 per cent and those which are non-member factories-87 per cent are found 'neligible'. Few factories which are at the 'established' state could extend lessons for other factories.

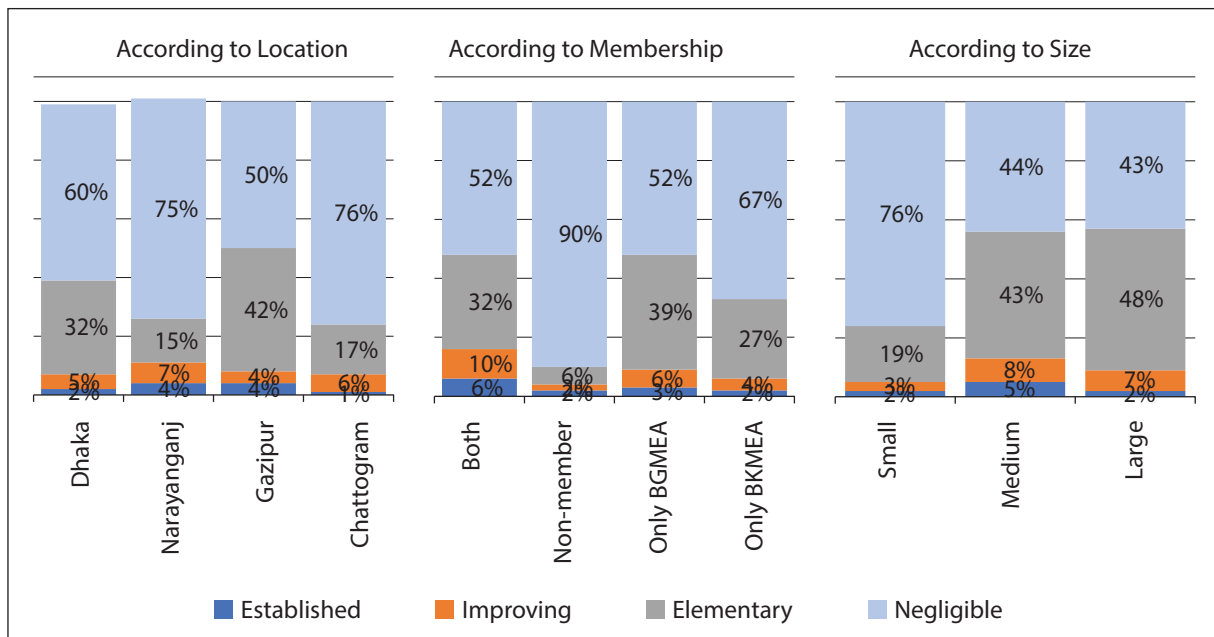**Figure 26: Maturity on Human Rights Policy Commitment Reporting**

| According to Location | According to Membership | According to Size |

Legend: ■ Established ■ Improving ■ Elementary ■ Negligible

Source: CPD-Christian Aid Survey, 2021.

8.2.2 Governance and Embedding

With regard to governance and embeddedness, a small section of medium and small factories has reached somewhat 'established' stage (Figure 27). However, the majority of large and medium-sized enterprises have reached the 'elementary' stage. Factories located in Dhaka and Gazipur are relatively

**Figure 27: Maturity on Governance and Embeddedness**

| According to Location | According to Membership | According to Size |

Legend: ■ Established ■ Improving ■ Elementary ■ Negligible

Source: CPD-Christian Aid Survey, 2021.

ahead of Narayangonj and Chittagong in terms of reaching 'elementary' level. However, non-member factories, not associated with either BGMEA or BKMEA, are the largest in share of any level, still struggling at a 'negligible' state.

8.2.3 Prioritising Risks and Salient Human Rights Reporting

In case of risk-prioritisation and human rights reporting, about 3-7 per cent of the factories are at the state of 'improvement' across all categories (Figure 28). However, the gap in terms of achieving the state of 'elementary' level is relatively high between large vs small scale factories, 52 vs 22 per cent respectively, BGMEA and BKMEA factories, 42 vs 27 per cent respectively and factories located in Gazipur and Chattogram/Narayangonj, 42 vs 29 per cent/22 per cent respectively. Therefore, it is imperative to narrow the gap between different categories of factories through effective measures and prevail against what caused the differences.

**Figure 28: Maturity on Prioritising Risks and Salient Human Rights**
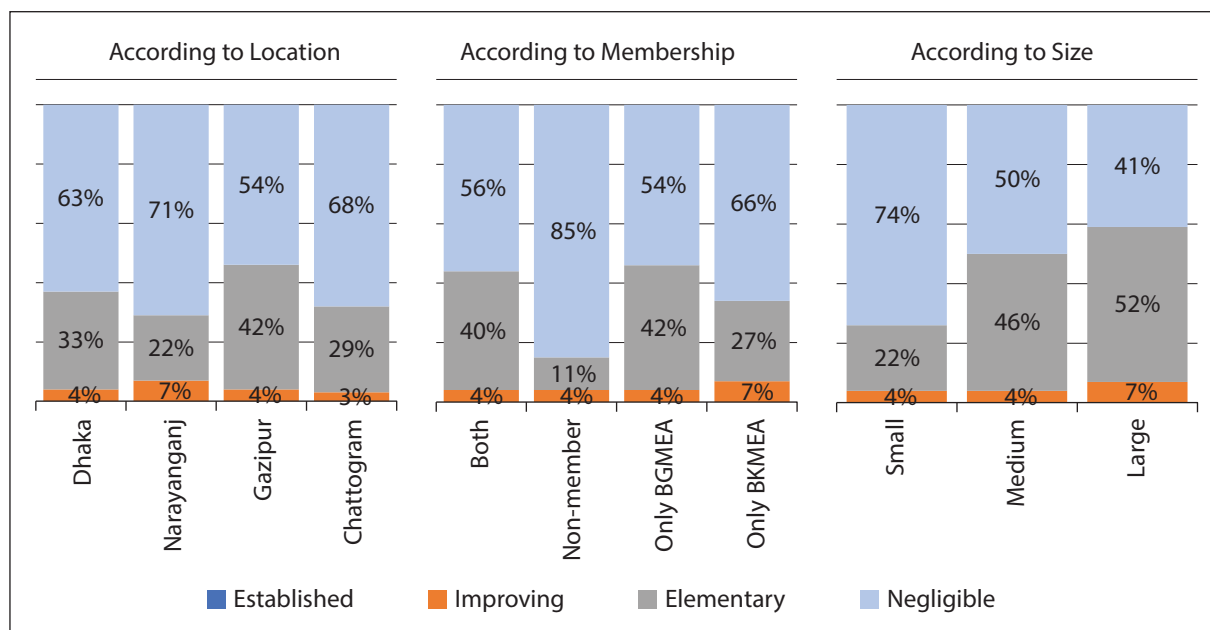
Source: CPD-Christian Aid Survey, 2021.

8.2.4 Stakeholders Engagement Reporting

The average level of progress in UNGPs practices is one of the slowest in case of stakeholder engagement (Figure 29). Majority of factories across different categories are stuck at 'negligible' state: even 59 per cent of large factories, 73 per cent of BGMEA affiliated factories and 82 per cent of BKMEA affiliated member factories; 77 per cent of Dhaka based factories and 73 per cent of Gazipur based factories. Factories thus need to undertake major initiatives forthwith with regard to stakeholder engagement.

Figure 29: Maturity on Stakeholder Engagement
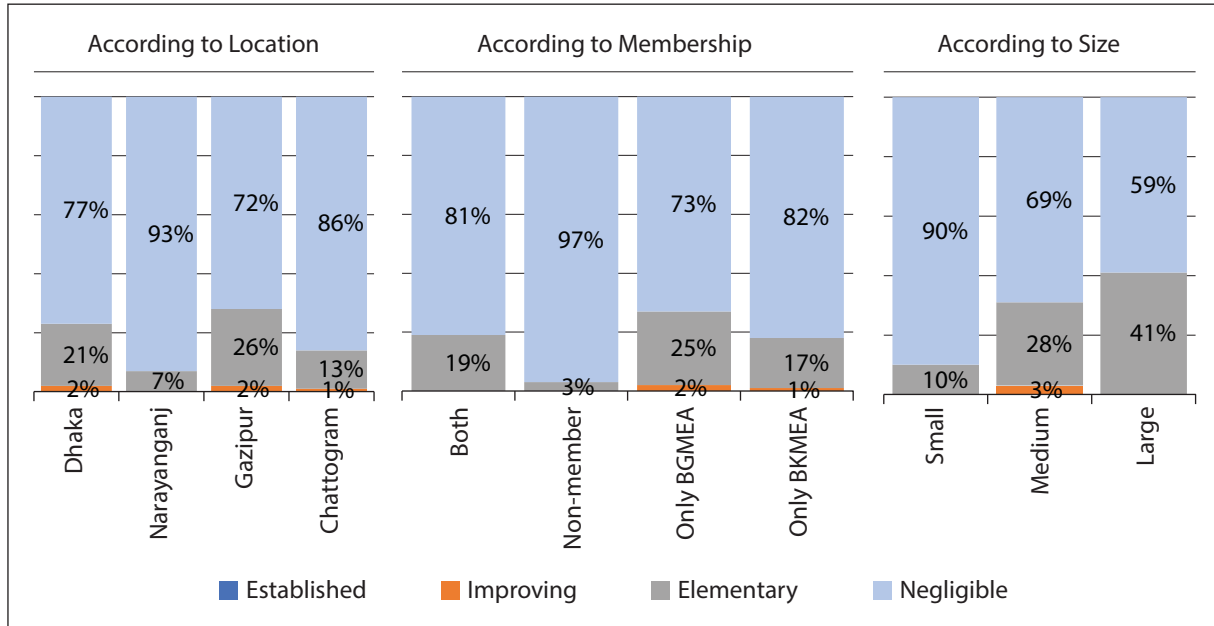
Source: CPD-Christian Aid Survey, 2021.

8.2.5 Assessing Human Rights Reporting

Similar to stakeholder engagement, human rights assessment of risks has made very slow progress. Majority of factories under different categories are at the 'negligible' state of progress. The gap between "elementary" and "negligible" levels in case of large-scale factories, however is rather thin than sharp, findings in the Figure 30 shows; nevertheless, major investment is required for making progress in this case.

**Figure 30: Maturity on Assessing Human Rights Risks**
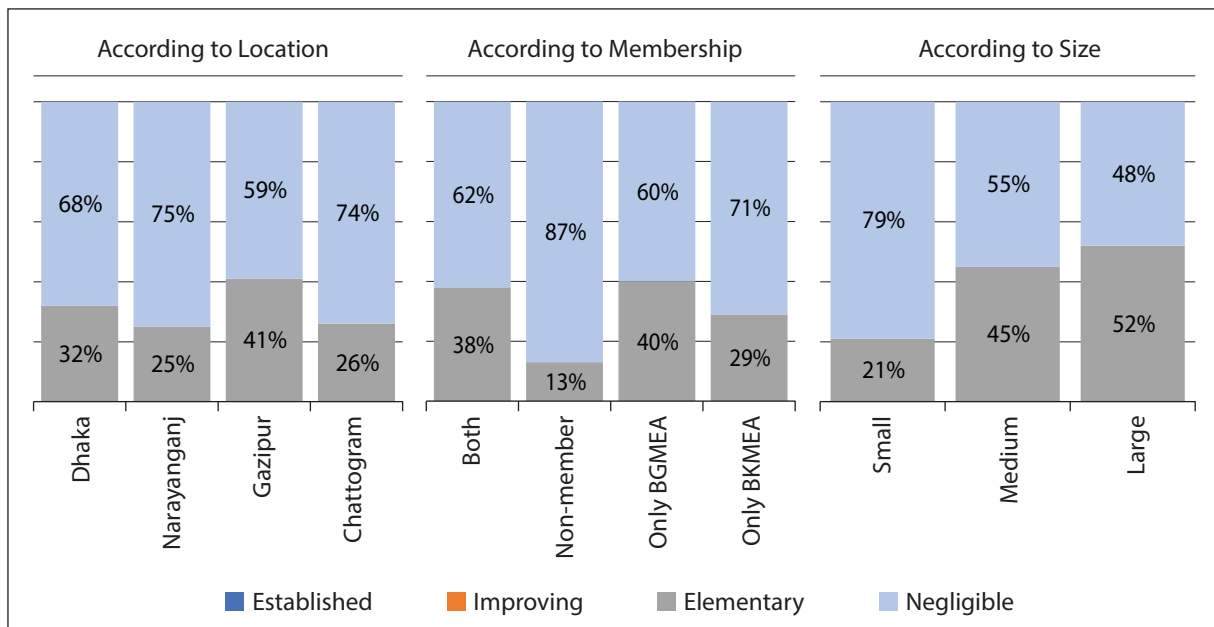
Source: CPD-Christian Aid Survey, 2021.

8.2.6 Integration and Mitigation Measures

Factories belonging to 'small' and 'non-member' categories and those located in 'Narayangonj' and Chattogram need major up-gradation in terms of integration and mitigation measures (Figure 31). In fact, up-gradation of factories in terms of "integration and mitigation" measures is necessary for all the perspectives: size-wise, membership-wise and location-wise.

Figure 31: Maturity on Integration and Mitigation Measures
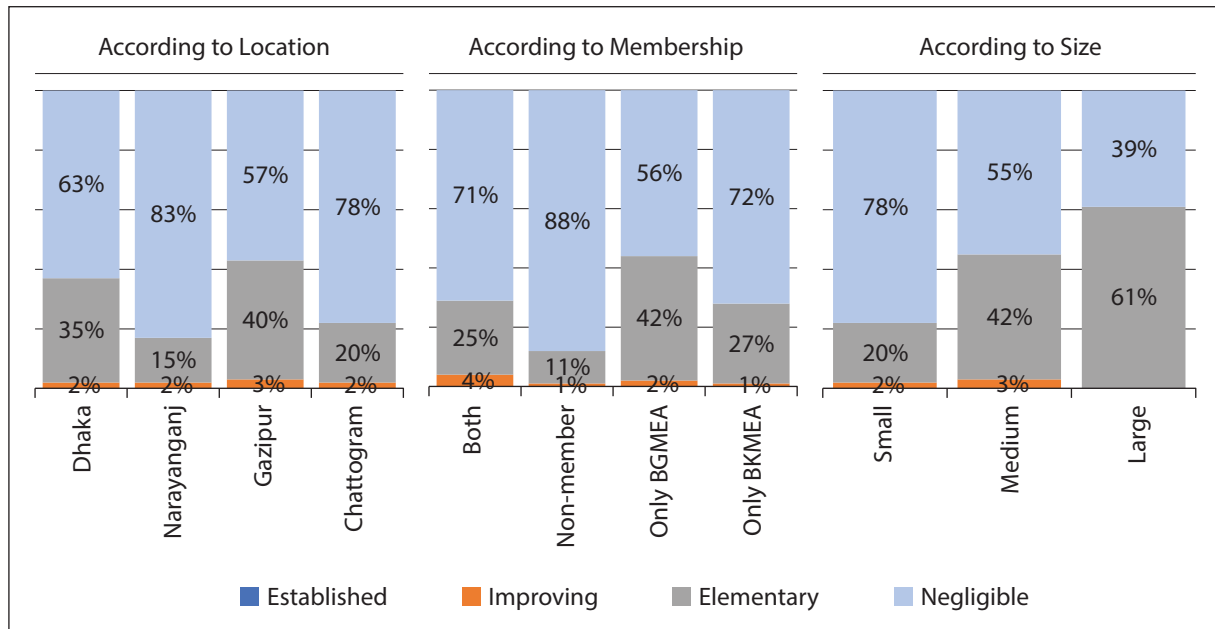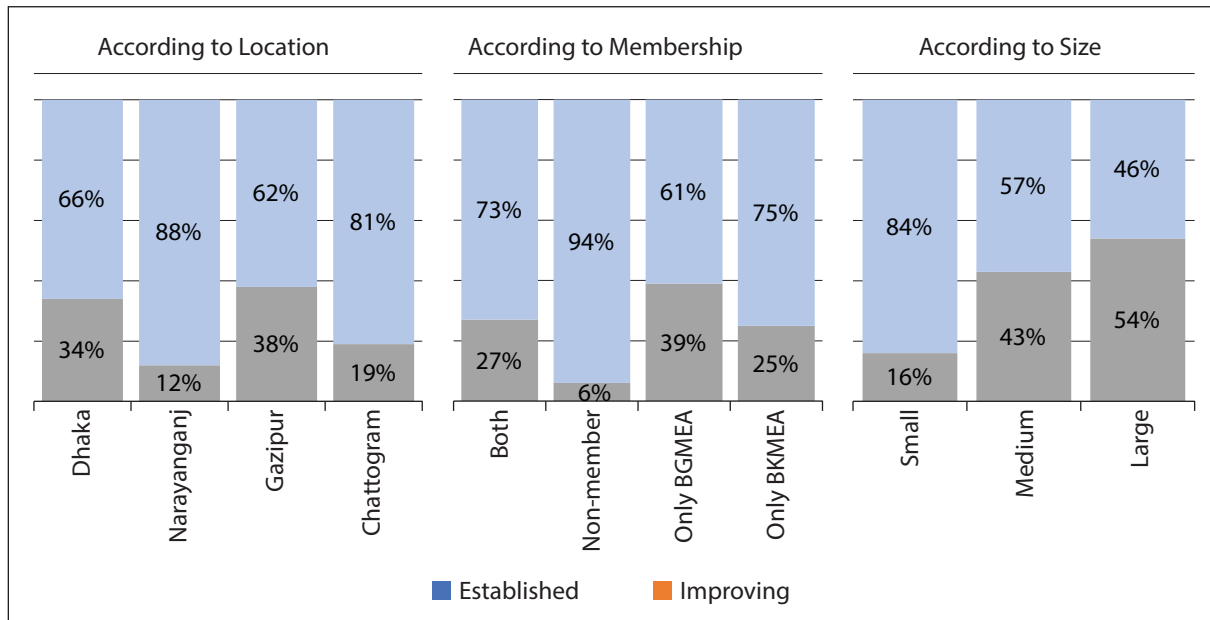

Source: CPD-Christian Aid Survey, 2021.

8.2.7 Tracking

None of the factories has reached the level of 'improving' and 'established' levels in case of tracking the human and labour rights-related issues (Figure 32). Factories need to invest in moving gradually from the level of 'negligible' to 'elementary' and from 'elementary' to 'improving' state.
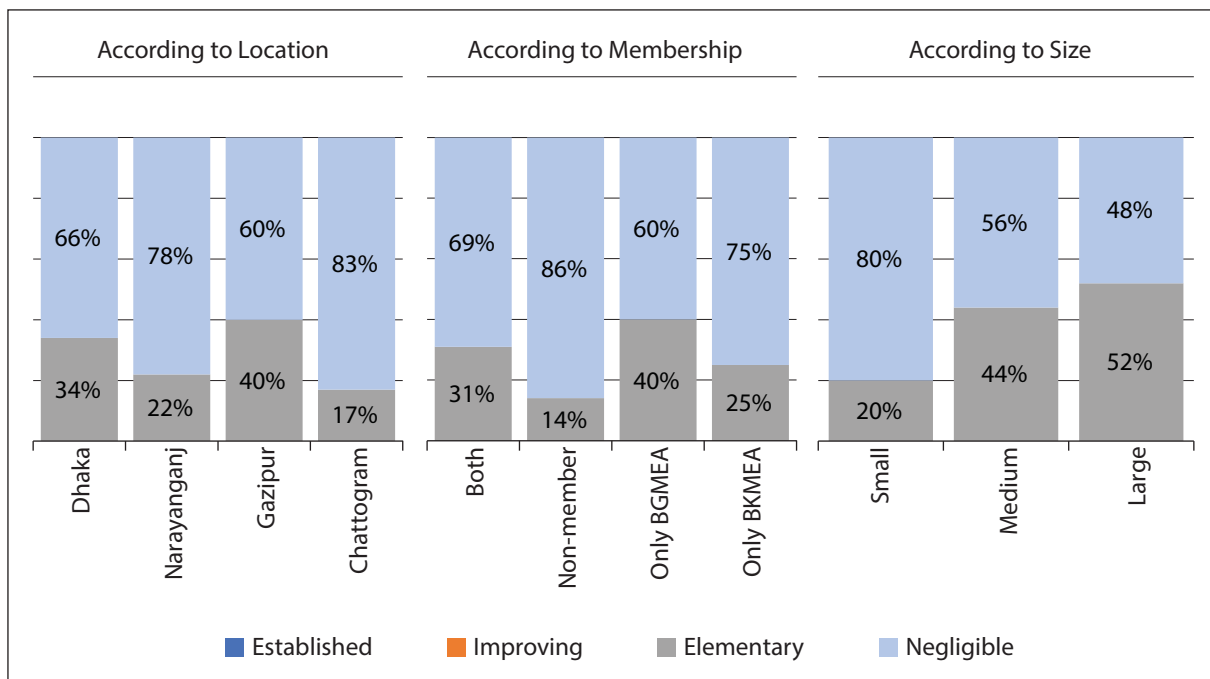
8.2.8 Remedy and Grievance Mechanism

There is little location-wise difference amongst the factories in terms of remedy and grievance mechanism (Figure 33). Small factories are, however, exceptionally in a poor state in this respect.

Figure 32: Maturity of Tracking

| According to Location | According to Membership | According to Size |

Dhaka: 66% / 34%; Narayanganj: 88% / 12%; Gazipur: 62% / 38%; Chattogram: 81% / 19%

Both: 73% / 27%; Non-member: 94% / 6%; Only BGMEA: 61% / 39%; Only BKMEA: 75% / 25%

Small: 84% / 16%; Medium: 57% / 43%; Large: 46% / 54%

■ Established   ■ Improving

Source: CPD-Christian Aid Survey, 2021.

Figure 33: Location-wise Difference Amongst the Factories in Terms of Remedy and Grievance Mechanism

| According to Location | According to Membership | According to Size |

Dhaka: 66% / 34%; Narayanganj: 78% / 22%; Gazipur: 60% / 40%; Chattogram: 83% / 17%

Both: 69% / 31%; Non-member: 86% / 14%; Only BGMEA: 60% / 40%; Only BKMEA: 75% / 25%

Small: 80% / 20%; Medium: 56% / 44%; Large: 48% / 52%

■ Established   ■ Improving   ■ Elementary   ■ Negligible

Source: CPD-Christian Aid Survey, 2021.

8.3 Overall Maturity Level of RMG Factories

In view of the discussion of the foregoing sections, a size-wise pattern of performance emerges for the factories. In general, large factories tend to perform better relating to human rights than medium-sized factories, and medium-sized factories perform better than small ones. Similarly, location is one of the important factors according to which the practice and standard of human rights fulfilment vary. Factories located in Dhaka and Gazipur districts have better performance in most human rights aspects than factories of Chattogram and Narayanganj. Enterprises under the canopy of BGMEA are pretty better than those under the membership of BKMEA.

9. Conclusion and Recommendations

The research study presents in detail the state of UNGPs in the export-oriented RMG sector of Bangladesh. The key components of the UNGPs have been examined based on the data collected through the primary survey of a nationally representative sample of RMG enterprises. A total of 603 sample RMG enterprises located in four major industrial clusters such as Dhaka, Gazipur, Narayangonj and Chattogram have been covered under the sample survey. Besides, a total of 606 workers working in 200 of the sample enterprises have been surveyed outside the factory premises in order to fathom and identify the differences in perceptions between (a) what is claimed by factory owners and (b) what is perceived by their workers on human and labour rights issues. The study has been undertaken at a time when the RMG sector has made significant investments for "workplace safety" and "workers' entitlements and rights" after the Rana Plaza tragedy in 2013. However, improving workers' well-being has received a jolt in the wake of the COVID-19 pandemic.

9.1 RMG Sector: Way Behind the Institutionalisation of UNGPs

The study observed that the concept of UNGPs is not fully clear to the garment manufacturers, although they understand human and labour rights issues. Despite diverge levels of human and labour rights practices at the factory level, the factories marginally adhere to the UNGPs. Overall, the practice of UNGPs in the RMG sector is still at the early stage – either those could be termed as 'negligible' or could be mentioned as 'elementary'. Among the eight indicators, a small section of enterprises reached a somewhat 'established' category in terms of '*governance and embeddedness*'. In case of some other categories, a small section of enterprises reached the level of 'improvement', which include "prioritisation of risks" and "identification of human rights risks", "integration and mitigation measures", and "stakeholder engagement". Overall, the process of institutionalisation of UNGPs has yet to be started in the RMG sector of the country.

The first step towards betterment will be to strengthen the reporting system of the factories as per UNGPs. There may be some workshops and training events that can be arranged for the management level staff of the factories on reporting per UNGPs, as UNGPs reporting is nothing but stating the factory's profile on the issues covered by UNGPs and publishing it in the public sphere. This does not require a great deal of administrative work because the factories already do that for their internal use or for audit purposes undertaken by government agencies and buyers. As a result, factories can also benefit if workshops are arranged as suggested here on the procedure and scope of publishing reports in line with UNGPs criteria. Factories will get a clear idea of what they need to do to get a larger

"maturity scale" in their reporting. Consequently, they need to take to improve human rights in their respective domain with a standard followed by the UN. This will help factories to set appropriate goals and achieve those.

9.2 Distinct Disparity in Human and Labour Standards in Terms of Size

Membership and Location of Factories

The study revealed size-wise, membership-wise and spatial dimensions in the level of human and labour rights practices in the RMG sector. In most instances, the large-scale enterprises are ahead of practising better human and labour rights issues compared to those of medium- and way above the small-scale enterprises. This is perhaps related to large-scale enterprises' better capacity to invest in the required infrastructure, logistics and human resources to comply with the expected standards. Complying with national laws and rules and, more importantly, complying with brands/buyers CoC are influencing factors for large-scale enterprises in better adherence of the large scale enterprises to UNGPs. On the contrary, medium- and small-scale enterprises are lagging behind mainly because of their lack of investment as well as lack of pressure from their small-scale buyers for maintaining compliance. Again, BGMEA members, largely woven goods manufacturers, are ahead in practising human and labour standards in their factories compared to BKMEA member factories. The difference in the level of compliance needs to be taken into account. Most importantly, non-member factories are way behind in practising human and labour rights issues. Factories located in Dhaka and Gazipur districts/clusters are found in a better state compared to those of Narayangonj and Chattogram districts/clusters. In fact, the majority of woven factories/BGMEA member factories are located in Dhaka and Gazipur and partly in Chattogram districts, while the majority of knit factories/BKMEA member factories are located in Narayangonj and partly in Chattogram. Hence, factories that are languishing behind in compliance, such as small scale, non-members and those located in Chattogram and Narayangonj, demand special attention.

9.3 Lack of Corporate Attitude Leading to a Well-neigh Bottleneck Towards Institutionalisation of UNGPs in RMG Factories

By and large, maintenance of CSR by the RMG enterprises is still at an early stage. Although a significant part of RMG enterprises is family-based private limited companies, a considerable share of these enterprises belongs to sole-proprietorship based companies. Moreover, *these private enterprises are largely governed by a single person*, and there is limited representation and voice of female workers in the decision-making process. Hence, an effective and pro-worker state of management is difficult to initiate and maintain under such a 'top-down' decision-making process within the factories. The interaction of management officials and the interaction between Management and Board are relatively less in small scale RMG enterprises. It is important to ensure corporate practice in the garment factories where factory management could exercise more authority to improve human and labour rights issues. In addition, management professionals in the garments sector need to be more sound in "academic qualifications" and "basic and specialised training" relating to human and labour standards. Further, the management needs to hire such staff and entrust them with specific responsibilities on industrial relations and human and labour related issues.

9.4 Faulty Ways of Public Disclosure Weakening Transparency in Human and Labour Rights Practices

Public disclosure is faultily explained by factory management through posters inside the factory premises for information of factory workers, government officials and buyers' representatives who visit factories occasionally. Little effort is undertaken to publicise this information through their websites; even the websites maintained by some are not updated, and information provided therein are by and largely inadequate. Hence, factories should be mandated to have their websites furnished with all necessary and updated information on human and labour rights and well practised in the factories as part of their public disclosure.

9.5 Factory Management Lacks Required Academic Qualification and are not Adequately Trained Enough to Handle the Human and Labour Rights Issues

Academic qualifications of GMs and HR Managers and other positions of the factory often do not comply with the requirement, as a large part of these Officials should have a specialised background in industrial management. Similar is the case of basic and specialised training for different specialised activities. Although factory management, particularly GMs, HR Managers and Officers, get trained on different human and labour rights issues both in-factory and outside, those are found inadequate in terms of adherence with the UNGPs. Even some of the key human and labour rights issues such as lay-offs/retrenchments workers organisations/trade unions do not appear in the list of training topics. An exclusive UNGPs-oriented short or medium-term training programme with a relevant curriculum needs to be designed. This will require designing the curriculum, taking into account the existing good practices in the RMG industry and good global experiences. BGMEA and BKMEA could do the designing of the curriculum with the technical support of the ILO and NSDA. These training courses could be offered by public and private academic/training institutes. Minimum academic qualifications and professional training could be made mandatory for different mid-and senior management positions in the RMG factories.

9.6 Human and Labour Rights Issues: Either Pressure-driven or Hand-picked

Although factories cover different human and labour rights issues in their public statement, the list does not necessarily include all. The study found that some of the issues getting more priority to the factories, such as child labour, a living wage, workplace harassment, workplace safety, etc. And some issues get less priority, such as layoff, retrenchment and collective bargaining. Again, there are variations amongst the factories in terms of priorities: small factories do not prioritise child-care and overtime benefit related issues. The priorities are largely driven by the pressure from the monitoring authority, like DIFE, FSCD and other government offices or the compliance requirement of brands/buyers. Besides, the priorities are influenced by the financial implications of compliances with workers' rights, such as lay off/retrenchment and child-care benefits. Collective bargaining is the lowest prioritised area for factories. Based on the areas of priority, factories design their internal training programme for management professionals and workers. It is important to ensure that all issues relating to UNGPs are included in the public disclosures of the factories. In this case, DIFE should make it mandatory for RMG factories to include all UNGPs related issues, and their regular inspection should monitor the progress of UNGPs at the factory level. BGMEA and BKMEA should arrange in-house training and capacity building programmes for their member factories where management professionals and representatives of

workers organisations such as WPCs/WWCs and safety committees could take part. Besides, factories could be encouraged to take certification of international standards and certification agencies on workers, workplace, pollution management, and environment-related issues. Brands/buyers and associations could extend technical support for factories to comply with different international standards and certifications. Non-member factories need to comply with UNGPs, and special initiatives should be undertaken through DIFE/DoL and Remediation Coordination Cell (RCC) and FSCD.

9.7 Indispensability of Transparent and Effective Monitoring and Inspection undertaken by the Public Authorities

Although different public authorities monitor and inspect factories on a regular basis, the types of complaints made by the workers on workplace safety, work-related harassments, monthly payments of dues and dues relating to layoffs and retrenchments indicate that workers' entitlements and rights are yet to be ensured through the monitoring process of public authorities. It is noticed that small scale factories, non-member factories and factories located in Narayangonj are inspected less, and complaints are high there. Lack of magistracy authority in the hands of the Inspectors sometimes weaken their position in ensuring factory level compliances. Hence, public monitoring and inspection authorities need to wield magistracy authority, even at a limited scale, to better monitor and better inspect the factories. At the same time, all types of factory related inspection and monitoring information and data, including the officials responsible for inspection, need to be made public through respective organisations websites.

9.8 Factory Level Grievance System: Not Sufficient to Ensure Workers' Rights to Justice

Despite the availability of a factory level grievance system, workers are not regularly taking support of the system. The formal complaints are relatively less, while informal complaints are rather high; this may happen due to a lack of interest in submitting complaints by writing due to limited academic qualification. This may be due to lack of comfort of making complaints against staff and colleagues who could create trouble. Hence, the grievance mechanism needs to be workers-friendly, which will ensure workers' voice and ensure the factory's accountability.

9.9 Practising Human and Labour Rights: Might be Rewarding in the Long-term, though Costly in the Short-term

Majority of factory management claimed that practising human and labour rights issues would ensure a higher level of sustained Supply Orders through better connectivity with the brands/retailers/buyers. However, factories are mainly concerned about the immediate investment to be made for HR development, creating logistics facilities and other institutional arrangements, etc. However, small-scale factories are not fully ready to undertake these investments to improve human and labour standards. In this connection, brands and buyers would do well extending technical and financial support; similarly, international development banks could extend low-cost credit support for firms to invest in those issues.

9.10 Little Interest of the Firms in Prioritising Salient Human Rights Issues and Possible Risks Associated with Non-compliance to UNGPs

Firms across the board have priority areas dealing with workers, and those have been handled at generic standards. There is little interest in setting targets according to the priorities in terms of risks and vulnerabilities and thereby designing the work plan. Hence, there is little evidence of short-medium-, and long-term targeting on improving human and labour standards in different categories of factories. Associations such as BGMEA and BKMEA and brands/buyers could encourage member factories to set short, medium, and long-term targets to comply with human and labour standards.

9.11 Management and Workers' Interactions in the Factories: Not Outcome-oriented

Despite regular interaction between factory management and factory workers through different Committees like WPCs, WWCs, Safety Committees and Anti-harassment Committees, workers-related issues and concerns remain at a high level, such as work-related harassment workers payment, maternity benefit, etc. According to the KIIs we had conducted, leaders of the workers emphasised using mobile phones to reduce harassment than any other policy. A worker can take a picture or video of abuse and share it through Imo, Whats-App, Facebook, etc., with other workers and even with the upper management of the factory and law enforcement agencies. The use of mobile phones, especially mobile phones with cameras, reduced the physical harassment to a certain degree that this issue is sparsely relevant in the RMG sector. Even verbal harassment is on the decline, too. A worker with a phone is not alone and voiceless anymore. Therefore, policies should be formulated so that it eradicates all the barriers for a worker to carry their mobile phone with them.

The extreme cases were observed during the pandemic when a large section of workers was laid-off or retrenched without prior notice, payment and other financial dues. Often the actions taken by the authority are mere verbal warnings. Overall, workers-related committees need to be made functional and effective to ensure workers entitlements and rights in the workplace. Furthermore, registration of trade unions should be encouraged in the RMG sector, the registration process needs to be transparent, and the accountability of registering authority needs to be ensured.

9.12 Workers-specific Likings/Dislikings in the Workplace

Both male and female workers specifically expressed their willingness to work in a particular place, even in monetised form. Under the existing facilities offered by factories, workers emphasize issues such as wages, verbal harassment, child-care facilities and digital payment facilities. Workers are ready to sacrifice some wages (hypothetically) if the factories offer child-care facilities, timely wages and no verbal abuse in the workplace. Interestingly, workers are not so much interested in taking their wages digitally. There are differences in the level of priorities between male and female workers, married and unmarried workers and more educated and less-educated workers. In other words, factories could get the benefit of less expenditure if they could improve the human and labour rights issues in the factories.

9.13 Gender Mainstreaming: Deserve Top-most Priority in Improving the Human and Labour Rights Issues in the RMG Sector and in Adhering to the UNGPs

Given the overwhelming structure of labour composition in the garments sector, human and labour rights issues should be designed, so that gender mainstreaming is ensured. Hence, public disclosure of human rights should be customised with a special focus on gender perspective. The institutional process to deal with these issues should attach priority to gender issues. For example, the officers' panel taking care of these issues should have a higher share of female staff. The in-house training curriculum should be designed to highlight gender-related issues. In this connection, the gender representation and gender voice in the factory board need to be ensured with a view to improving the overall gender mainstreaming in the factory level activities.

10. Recommendations for the Stakeholders

Based on the recommendations presented extensively in section 9 above, stakeholders responsibilities have been identified. The human and labour rights issues, according to the UNGPs, are the focal activities of a number of public and private organisations. These include MoLE, MoC, ILO, FSCD, DIFE, DoL, RCC, NSDA, BGMEA. BKMEA, Board of the factories, Management of the factories, WWCs, WPCs, public and private academic institutes. There are responsibilities of brands, buyers and different international certification agencies in supporting factories in strengthening human and labour rights practices. Table 50 presents a list of challenges, recommendations, and likely responsible agencies in addressing the recommendations to improve human and labour rights issues.

Table 50: List of Challenges, Recommendations and Likely Responsible Agencies in Addressing the Recommendations

Major Challenges	Recommendations	Responsible Organisations
RMG sector lags way behind in institutionalising UNGPs in the RMG sector	• The first step will be to strengthen the factory reporting system in line with the UNGPs; there may be some workshops and training events arranged for the management level staff of the factories on reporting as per UNGPs	• BGMEA • BKMEA Ministry of Commerce (MoC) • Ministry of Labour and Employment (MoLE) • DIFE • DoL
Disparity in Human and Labour Standards in terms of *size, membership* and *location* of factories is well-noticed	• Factories lack way behind in compliance, such as small scale, non-members and those located in Chattogram and Narayangonj need special attention	• BGMEA • BKMEA • DIFE • DoL
Lack of corporate approach would be a bottleneck for the institutionalisation of UNGPs in RMG factories	• It is important to ensure corporate practice in the garment factories where factory management could be encouraged in undertaking activities relating to the improvement of human and labour rights issues • The Management needs to hire staff aware of specific responsibilities on industrial relations and human and labour related issues	• BGMEA • BKMEA • Factory Boards • Factory Management

(Table 50 contd.)

(Table 50 contd.)

Major Challenges	Recommendations	Responsible Organisations
Defective ways of public disclosure is weakening transparency in Human and Labour Rights practices	• Factories should be mandated to develop and well maintain their websites with necessary, updated information on human and labour rights practised in the factories as part of their Public Disclosure	• BGMEA • BKMEA • Factory Boards • Factory Management
Factory management lack academic education and are not adequately trained to handle the Human and Labour Rights issues	• An exclusive UNGPs-oriented short-and medium-term training programme needs to be designed. • This will require designing the curriculum, taking into account the existing good practices in the RMG industry and good global experiences • BGMEA and BKMEA could do the designing of the curriculum with the technical support from ILO and NSDA • These programmes could be offered by public and private Academic/Training Institutes • Minimum academic qualifications and professional training could be made mandatory for different mid and senior management positions in the RMG factories	• BGMEA • BKMEA • ILO • NSDA • Public/Private Academic/Training Institutes
Human and Labour Rights issues are either pressure-driven or hand-picked	• It is important to ensure that all issues relating to UNGPs are included in the public disclosures of the factories • In this case, DIFE should make it mandatory for RMG factories to include all UNGP related issues, and their regular inspection should monitor the progress of UNGPs at the factory level • BGMEA and BKMEA should arrange in-house training and capacity building programmes for their member-factories where management professionals and representatives of workers organisations such as WPCs/WWCs and Safety Committees could take part • Besides, factories could be encouraged to take certification of international standards from certification agencies on workers, workplace, pollution management and environment-related issues • Brands/Buyers, as well as Associations, could extend technical support for factories to comply with different international standards and certifications • Non-member factories need to comply with UNGPs, and special initiatives should be undertaken through DIFE/DoL and RCC and FSCD	• Factory Board • Factory Management • BGMEA • BKMEA • WPCs/WWCs • Safety Committees • Certification Agencies • Brands/Buyers • DIFE/DoL • RCC • FSCD
Monitoring and Inspection undertaken by the Public Authorities need to be transparent and effective	• Public Monitoring and Inspection Authorities need to possess magistracy authority, even at a limited scale, to better monitor and better inspect the factories • At the same time, all types of factory related inspection and monitoring information and data, including the officials responsible for inspection, need to be made public through respective organisation's websites	• MoLE • DIFE • DoL

(Table 50 contd.)

(Table 50 contd.)

Major Challenges	Recommendations	Responsible Organisations
Factory level Grievance System does not necessarily ensure workers' rights to justice	• The Grievance Mechanism needs to be workers-friendly, and ensure workers' voice and ensure the factory's accountability	• Factory Board • Factory Management • BGMEA • BKMEA
Practising Human and Labour Rights appears to be rewarding in the long term, though costly in the short term	• Brands and Buyers would extend technical and financial support • Similarly, international development banks could extend low-cost credit support for firms to invest in those issues	• Brands • Buyers • International Development Bank • Local Commercial Banks
Firms have little interest in prioritising salient Human Rights issues and probable risks associated with due compliance	• Associations such as BGMEA and BKMEA and brands/buyers could encourage member-factories to set short-, medium- and long-term targets in complying with human and labour standards	• BGMEA • BKMEA • Factory Board • Factory Management
Management and workers' interactions in the factories are not outcome-oriented	• The use of mobile phones, especially mobile phones with cameras, might reduce the physical harassment to a certain degree that this issue is sparsely relevant in the RMG sector. Even verbal harassment is on the decline, too. A worker with a phone is not alone and voiceless anymore. Therefore, policies should be formulated so that it removes all the barriers for a worker to carry their phone with them • Workers-related Committees need to be made functional and effective with a view to ensuring workers entitlements and rights in the workplace. Registration of trade unions should be encouraged in the RMG sector, and the process of registration needs to be transparent, and the accountability of registering authority needs to be ensured	• Factory Workers • WPCs • WWCs • Safety Committees • DoL • DIFE
Workers are specific about their likings / dislikings in workplace	• Factories could get the benefit of less expenditure if they could improve the human and labour rights issues in the factories	• Factory Management
Gender mainstreaming should be the top-most priority in improving the Human and Labour Rights issues in the RMG sector and thereby in ensuring adherence with the UNGPs	• Public Disclosure of Human Rights should be customised with a special focus on gender. The institutional process to deal with these issues should attach priority to the gender factor • The In-house Training Curriculum should be designed to highlight gender-related issues. In this connection, the gender representation and gender voice in the factory board need to be ensured with a view to improving the overall gender mainstreaming in the factory level activities	• Factory Board • Factory Management • Training Institutes specialised in GBVH issues

Source: CPD-Christian Aid Survey, 2021.

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Annex 1: DCE Methodology

1.1 Theoretical Background of DCE

This study conducted a Discrete Choice Experiment (DCE) as a measure to find out the preference of job attributes by workers. The discrete choice experiment is based on the Random Utility Model (RUM). This model posits that choosing an alternate option from a collection of options provides a particular degree of utility to the individual. Let's assume a worker n, receives utility from an alternative option j, this can be expressed as U_{nj} where, $j = 1,$ $...,J$. Now, the worker would choose another alternative option i , if and only if $U_{ni} > U_{nj} \forall_{j \neq i}$. Now, utility is only known to the workers who choose an alternative option over others. Researchers can observe some attributes (x_{nj}) of the alternative options that a decision-maker faces and some characteristics (s_n) of the decision-maker. Therefore, a *represented utility* can be derived by,

$$V_{nj} = V(x_{nj}, s_n) \; \forall_j \; (1)$$

However, researchers cannot observe all aspects of utility of a worker, $V_{nj} \neq U_{nj} \; \forall_j$. Therefore, the *utility of the individual* can be divided into,

$$U_{nj} = V_{nj} + \varepsilon_{nj} \; (2)$$

Where, V_{nj} is the observable utility components and ε_{nj} is the part of utility that is not included in V_{nj}. Researchers do not know about $\varepsilon_{nj} \; \forall_j$, therefore it can be assumed as random.

Now, the probability that a decision-maker chooses an alternative i can be written as,

$$Pni = Pr(U_{ni} > U_{nj} \; \forall_{j \neq i})(3)$$
$$= Pr(V_{ni} + \varepsilon_{ni} > V_{nj} + \varepsilon_{nj} \; \forall_{j \neq i})(4)$$
$$= Pr(\varepsilon_{nj} - \varepsilon_{ni} < V_{ni} - V_{nj} \; \forall_{j \neq i})(5)$$

Now, assuming that, the person will select one from three or more alternatives and distribution of ε_{nj} is independent and identically distributed with type-I, extreme values commonly known as the Gumbel distribution by McFadden (1974), a conditional logit (CL) model, maybe developed,

$$P_{ni} = \frac{\exp V_{ni}}{\sum_{j=1}^{J} \exp V_{nj}} \; (6)$$

In a discrete choice experiment, *marginal willingness to pay* (MWTP) is the amount of money respondents are prepared to pay for a desirable categorical feature. The marginal rate of substitution of any non-monetary and monetary characteristic may be determined by rationing these parameter estimations.

$$WTP_k = \frac{\frac{\delta U}{\delta x_k}}{\frac{\delta U}{\delta x_p}} = \frac{\beta_k}{\beta_p} \; (9)$$

There are different methods for estimating the intervals of MWTP and here nonparametric bootstrapped method by Krinsky and Robb were used (Krinsky & Robb, 1986)

1.2 Setting up the DCE

In order to set up the level and attributes for this study, information gathered from the KII, and previous literatures were used. Also, some of the novel levels were introduced to find their preference by workers, such as digital payment. These attributes and levels are listed in Annex Table 1.

Annex Table 1: Attributes Descriptions and Levels

Attributes	Description	Levels
Child Care Center	Child-care Center is important, particularly for working mothers of young children.	No Child Care Center
		Child Care Center
Medical Facility	In general, if the factory provides for the medical facility, then workers can avail of primary medical services. Therefore, workers prefer such features in their workplaces	Medical Facility
		No Medical Facility
Free Lunch or Snacks	Free lunch and snacks can be a motivator for workers. However, this can go in two ways: sometimes workers might not like lunch/ snacks provided by factories.	No Free Lunch or Snacks
		Free Lunch or Snacks
Verbal Harassment	Harassment is generally very discouraging for workers. However, it was revealed from KII that physical harassment is insignificant at the present time. Therefore, only verbal harassment is taken for this study.	No Verbal Harassment
		Verbal Harassment
Digital Payment	Some factories provide their wages in different digital/mobile payments. Regardless, its popularity is yet to be tested among workers. Therefore, this study includes this attribute to make evidence-based policy.	Digital Payment
		No Digital Payment
Wages	As RMG workers have a very low income, the wage is one of the most important job attributes. Workers prefer high wages mostly; however, sometimes other attributes may save them money; therefore, this study pitted wages against those benefits and looked into their importance.	BDT 8,000/-
		BDT 11,000/-
		BDT 14,000/-

Source: Authors' Illastations.

The study titled 'State of UNGPs in the RMG Sector of Bangladesh' investigates the extent to which the United Nations Guiding Principles (UNGPs) are being followed in Bangladesh's Ready-made Garment (RMG) industry. The UNGPs define the responsibility of states and corporations to protect and respect human rights and provide remedies for grievances that arise.

The study used a combination of qualitative and quantitative research methods to estimate the level of compliance of individual businesses and the sector as a whole with the UNGPs. The research revealed that Bangladesh's RMG sector is struggling with human rights issues. Based on the Shift Maturity Index (2015), eight components were considered that show micro, macro, and cross-sectoral responsibilities of maintaining human rights practices. These components include policy commitment, governance and embedding, prioritisation of risks, stakeholder engagement, assessing human rights risks, integration and mitigation measures, tracking, and remedy and grievance mechanisms. The study found that all eight indicators of human and labour rights are still at an early stage of development.

The study recommends that a training programme be developed to provide factory management with the skills necessary to handle human and labour rights issues. Additionally, factories should be mandated to maintain their websites with all necessary information on human and labour rights practised in the factories. The study also found that factory management needs to exercise more authority in undertaking measures and interventions towards improved human and labour rights.