

RMG Monitoring Brief (II)

Civil Society Monitoring on
Occupational Safety and Health (OSH) in the RMG Sector: 2023-2024



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Abstract

This 'RMG Monitoring Brief' is the second in a series of briefs published under the civil society monitoring initiative. The objective of this brief is to conduct a concise review of the progress made by the RMG Sustainability Council (RSC) in fulfilling its mandated responsibilities and to identify areas for improvement that can enhance its effectiveness in ensuring safety monitoring. RSC was set up to act as the national initiative that would implement the programme of the former Bangladesh Accord, now International Accord. The brief identifies the scope for further improvement in RSC's operational and institutional performances. These areas include (a) its inspection effectiveness, coverage, reporting, and prioritising mechanism; (b) its management of remediation and escalation protocols; (c) the effectiveness and coverage of the training it provides; and (d) the pace of its OSH-related complaint-resolving mechanism. Based on the findings, the brief recommends several steps for further strengthening RSC's operations and institutional performance.

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Maintaining Workplace Safety in RMG Factories during 2023

How Effectively is RSC Fulfilling Its Role?

1. Introduction

2023 marks the tenth anniversary of the Rana Plaza catastrophe. In the past decade, a range of initiatives have been implemented in the Bangladeshi RMG industry to address concerns related to workplace safety. As such, no catastrophic incident similar to the Rana Plaza collapse has occurred in these years. However, lately, a slight increase can be observed in the number of industrial accidents in the RMG industry and the number of workers killed (Moazzem and Ahmed, 2023). For example, the number of fire incidents in the export-oriented RMG industry was 177 in 2020, which increased to 180 in 2021 and jumped to 241 in 2022 (BFSCD, 2023).

Also, the number of workers who died in workplace accidents in the RMG industry increased to 13 in 2021 from 2 in 2019 and 1 in 2020 (Safety Rights, 2023). In fact, workplace accidents in the RMG industry continue to take place in 2023 as well. On February 19th, 2023, a garment worker at an export-oriented garment factory died when a wall of the building collapsed (Sustainable Fashion Resource Centre, 2023). On May 1st, 2023, a fire broke out at an export-oriented garment factory resulting in at least 18 employees suffering burns (The Daily Star, 2023). In 2023 (as of July 30th, 2023), workplace accidents occurred in at least three RSC-covered factories as well.

This growing number of workplace accidents has sparked fresh concerns regarding the effectiveness of the initiatives undertaken following the Rana Plaza incident. With this recent deterioration of RMG workplace safety, it is crucial to review the safety inspection and training status, particularly when Accord and Alliance are not in operation in the country anymore. The RMG Sustainability Council (RSC) and Nirapon are two private sector-led initiatives that have taken over the responsibilities after the end of Accord and Alliance initiatives. Since 2017 the Remediation Coordination Cell (RCC) has monitored the

progress of the National Initiatives-led factories, and the activities have been handed over to the Industrial Safety Unit (ISU). Hence regular monitoring of the performance of these OSH-related initiatives is highly important to ensure the safety and security of workers in the RMG sector of Bangladesh.

2. The Civil Society Monitoring Initiative on Occupational Safety and Health (OSH), 2023

The civil society monitoring initiative, called 'Civil Society Monitoring on Occupational Safety and Health (OSH)' has been reintroduced by CPD in 2023, mirroring the efforts undertaken in 2014 after the Rana Plaza incident. The initiative's main objective is to undertake open, critical, and independent civil society monitoring and reporting of the functioning of Bangladesh's public and private sector monitoring initiatives and measures. Already the initiative has launched its first RMG monitoring brief titled 'Emerging Concerns of Occupational Safety and Health of the RMG Industry: Role of Public and Private Monitoring Agencies'. The brief identified the key areas of concern regarding the recent performances of public and private agencies responsible for monitoring and inspecting RMG enterprises. This 'RMG Monitoring Brief' is the second of a series of briefs published under the civil society monitoring initiative.

Since the RSC is led the most important initiative of monitoring the safety-related concerns in the RMG factories of Bangladesh, this brief reviewed the RSC. Subsequent briefs will be published targeting similar assessments for other monitoring agencies, including DIFE (Department of Inspection for Factories and Establishments) and its newly formed unit, ISU (Industrial Safety Unit), and Nirapon.

3. Rationale and Objective of the Second RMG Monitoring Brief

RSC was set up to act as the national initiative that would implement the programme of the former Bangladesh Accord, now International Accord. This brief is centred on assessing the RSC's current operational progress and institutional framework, as its role holds significant importance on various accounts in ensuring workplace safety in the Bangladesh RMG industry.

First, RSC has been entrusted with the responsibility of taking over and maintaining the significant achievements made by the Accord during its operation in Bangladesh. In order for the RSC to establish its credibility by maintaining the higher standard set by the Accord, it must continue to dedicate similar, if not greater, effort.

Second, RSC already covered 1887 factories (as of June 2023), which is 51 per cent of the total RMG export industry of Bangladesh [as per the data of MiB (2023)]. Also, RSC plans to gradually increase the number of its covered factories in the future. Hence, the operation of RSC has a large impact on workplace safety status in Bangladesh's entire RMG exporting industry.

Box 1: Selected modifications of RSC as per the first monitoring brief	
Issues identified	RSC's response
• Delayed updating of data	• Data is now being updated regularly.
• No monthly reporting	• Report is now being published on a monthly basis.
• Limited data disclosure	• Enabling filter options for different datasets in RSC website has made data access easier. • Statements on ineligible factories are now being published.
Source: Moazzem and Ahmed (2023).	

Third, all the RSC factories are also under the inspection coverage of the government agency DIFE. Despite recent improvements, DIFE still lacks inspection capacity in terms of skill and manpower. As a result, RSC has to play a complementing role along with DIFE in ensuring safety monitoring in the RMG industry.

Fourth, and lastly, taking note of the issues identified in the first brief of the CSO initiative published in April 2023, the RSC has made several modifications (Box 1). CPD highly appreciates this positive response from the RSC. This, at the same time, implies that enabling an independent assessment could assist RSC in achieving higher effectiveness.

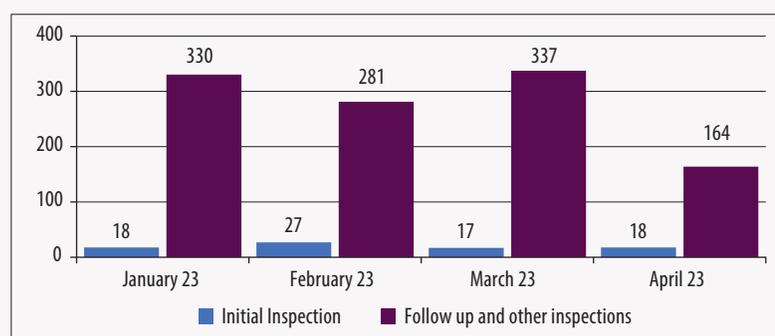
The objective of this particular RMG monitoring brief is to conduct a succinct review of the progress made by the RSC in fulfilling its mandated responsibilities and to identify areas for improvement that can enhance its effectiveness in ensuring safety monitoring.

4. A Review of the Progress of RSC as per Its Mandated Responsibilities

4.1 Progress on safety inspections

One of the key mandated tasks of RSC is to conduct regular fire, electrical, and structural safety inspections. RSC conducts several types of inspections – (a) initial; (b) follow-up; (c) special; and (d) verification inspections. Initial inspections are conducted to identify key safety non-compliances and based on which a corrective action plan (CAP) is developed. The plan stipulates a certain timeline for the CAP to be implemented. In order to monitor the implementation of this CAP, RSC conducts follow-up inspections. Besides, RSC conducts special inspections in case any safety-related incident occurs in the covered factories. During the Accord period, boiler inspections were conducted at a pilot scale. Although the RSC has reported integrated boiler inspection into its regular inspection mechanism, there is still no available public reporting by the RSC about boiler-related corrective actions being taken at any of the covered factories, as is detailed below.

Figure 1: Number of monthly inspections conducted by RSC



Source: RSC monthly reports.

According to the RSC website, since the formation of RSC as of April 2023, RSC engineers have conducted a total of 760 initial inspections (across all categories of safety) and 6,206 follow-up inspections. The monthly inspection data shows that in the last five months (December 2022-April 2023), RSC, on average, conducted 20 initial inspections and 255 follow-up and other inspections each month (Figure 1). A sharp decline can be observed in follow-up and other inspections in the latest month (April 2023). However, it is important to consider that some of these

inspections, such as special inspections, are carried out on a demand basis. Therefore, the decline in these specific types of inspections may not necessarily indicate an overall reduction in RSC's inspection activities. Nevertheless, an over 50 per cent decline in follow-up and other inspections compared to previous months raises concerns. RSC should consider publishing the data categorising the number of inspections based on their specific types, as well as information on the number of unique factories that underwent inspections. This additional information would provide further insights into the reasons behind the drop in the overall number of inspections. However, other than the number of inspections conducted, a number of issues could be observed in regard to the inspection of the RSC.

The inspection-related data published by RSC lacks clarity, leading to discrepancies that impede a clear understanding of the actual inspection scenario. The anomalies in data reporting can be observed in case of number of inspections conducted every month, types of inspections and time commitment for regular inspections, etc. These problems of RSC arose perhaps because of handling a substantial amount of data and information with limited technical and human resources.

Due to the movement restrictions, RSC could not conduct its regular inspection during COVID-19. Hence, RSC fell behind its regular schedule and had to develop a system for prioritising inspections based on importance and urgency. It established an inspection priority category table to prioritise its inspection capacity. However, the number of inspections against each priority category is not available on the RSC website. Availability of such information would make the inspection distribution process more transparent. Furthermore, the recently introduced priority category, 'Business order issue,' should be reconsidered, as with existing limited capacity, it may create additional pressure on RSC in conducting inspections.

According to the inspection priority table, the top priority for inspection is assigned to any safety-related incident occurring in any of the RSC-covered factories. In the event of an incident at one of the RSC-covered factories, the factory must undergo a special inspection. The analysis of Corrective Action Plans (CAPs) for several RSC-covered factories indicates that RSC did not conduct special inspections promptly or at all, despite accidents occurring in those factories. An instance illustrating this issue is the fire incident that occurred at an RSC-covered factory on February 24th, 2023 (Channel I Online, 2023). As per the

inspection priority table, an immediate inspection was required for the factory. However, upon examining the Corrective Action Plan (CAP) uploaded on the RSC website, it is evident that no special inspection has been conducted at the factory as of the date (as of July 05th, 2023), indicating a delay in fulfilling the inspection requirement.

In another instance, a factory where the RSC identified so-called “hot spots” in the electrical installation and signs of burning in June 2022 was given one week to resolve this issue. However, no remediation progress was reported by the factory, and no follow-up inspection was conducted. In October 2022, a fire broke out in this factory, which firefighters suspected was caused by an electric short circuit (NewAge BD, 2022). The CAP indicates there has not been any electrical or fire safety follow-up inspection since, and the factory still has not reported any progress on solving the hot spot issues.

Another concern observed in the case of RSC inspection is its insufficient focus on boiler inspection. While discussing with RSC, it said that the boiler inspection team has undergone training and is now prepared. They are currently conducting a two-day inspection of the boilers. If any issues are found, the factories will not be permitted to restart the boilers. However, it appears that the inspections of boilers, reporting of inspection findings, and reporting of remediation progress of boilers are still to be made good on. It is important for workers’ safety that those are carried out with the same level of thoroughness as fire, building, and electrical inspections. For instance, although the RSC has claimed that its regular inspection includes boiler inspections, there appears to be no reflection of these inspections in the individual Corrective Action Plans of factories.

According to a factory management official, it would be more effective if the same RSC inspector who conducted the initial inspection could also conduct all the follow-up inspections. However, this could make the process way more inefficient. A better focus should be made on more detail and concrete reporting so the next inspector can access all the necessary information to conduct follow-up inspections.

4.2 Progress on Safety Remediation

Similar to the Accord, the RSC is mandated to oversee the remediation progress of existing CAPs and their verification in its covered factories. In the launching month of RSC, which was June 2020, the remediation progress of CAPs reached 92.39 per cent. However, according to the latest data available in April 2023, the safety remediation progress of RSC-covered factories stands at 91.32 per cent. It is important to note that new factories are continuously added to and removed from RSC coverage. Therefore, monthly fluctuations in the progress percentage may not necessarily indicate overall improvement or deterioration in the remediation progress. RSC should consistently report the number of factories included and excluded from its coverage which would allow to understand the process better.

The distribution of factories based on remediation progress reveals a consistent increase in the number of factories with 100 per cent verified progress in recent months (Table 1). As of April 2023, a total of 515 factories covered by the RSC had achieved 100 per cent verified

remediation progress. However, the data for January 2023 appears to be unusual compared to the trend. Over the course of four months (December 2022 to April 2023, excluding January 2023), the average number of factories in the 81-90 per cent progress range was 147. Yet, in January, there were only 57

Table 1: Safety remediation progress-wise number of RSC-covered factories

Category	As of December 2022	As of January 2023	As of February 2023	As of March 2023	As of April 2023
Total	2158	2067	2168	2179	2186
Rate of remediation					
0-20%	10	10	11	11	12
21-40%	22	17	15	20	21
41-50%	26	22	26	23	23
51-60%	42	43	38	40	43
61-70%	51	59	61	61	55
71-80%	66	59	58	60	57
81-90%	153	57	149	144	143
91-100%	1295	1300	1306	1310	1317
100% verified	493	500	504	510	515

Source: RSC monthly reports.

factories in the same category. A drop in the total number of factories in January 2023 indicates that this may be happened due to typos in the reported data.

On the other hand, item-wise data shows there has been limited remediation progress in case of a few fire-related items, particularly those requiring higher installation costs (Table 2). As of April 2023, the installation progress for fire suppression systems stood at 22.40 per cent, while the installation progress for fire detection and alarm systems was at 27.25 per cent. While it is true that addressing the installation of these fire equipment in factories can be complex, and the RSC provides guidance to assist factories in this regard, there is a need for an increased focus on addressing the underlying causes of the slow progress in these specific items. Merely providing guidance may not be sufficient, and efforts should be directed toward understanding and resolving the root causes of the delays or challenges associated with installing this fire safety equipment.

Table 2: Safety remediation progress of RSC-covered factories

(in %)

Name of the items	As of January 2023	As of February 2023	As of March 2023	As of April 2023
Installation of Fire Suppression System	63.50	26.61	22.40	22.40
Installation of Fire Detection & Alarm System	53.00	22.84	22.25	27.25
Adequate egress lighting in fire exits	96.10	96.20	88.00	89.00
Removal of lockable collapsible gates	99.10	99.20	96.00	96.00

Source: RSC monthly reports.

Additionally, the data of item-wise remediation reported by the RSC appears somewhat inconsistent. For instance, in January 2023, the progress of fire suppression system installation was reported at 63.50 per cent, but it dropped significantly to 26.61 per cent the following month (Table 2). Such a drastic decline in progress is unlikely to be a true reflection of the situation, even when considering the inclusion of new factories under the coverage of the RSC. Clarification is needed to understand whether this fall in progress is a data reporting issue.

Much of the progress of remediation of RSC-covered factories depends on the effective implementation of escalation protocol. The data provided by the RSC highlights that a significant number of factories consistently remain in stage 2 of the escalation protocol (Table 3). However, in contrast, the number of ineligible factories¹ has been relatively low in recent years. Over the course of three years (2020, 2021, and 2022), the average number of ineligible factories was lower than the average for the previous three years (Figure 2). Increasing transparency in the entire escalation process could be achieved by disclosing the data of RSC factories, specifically regarding the duration of their stay in each category. This would provide valuable

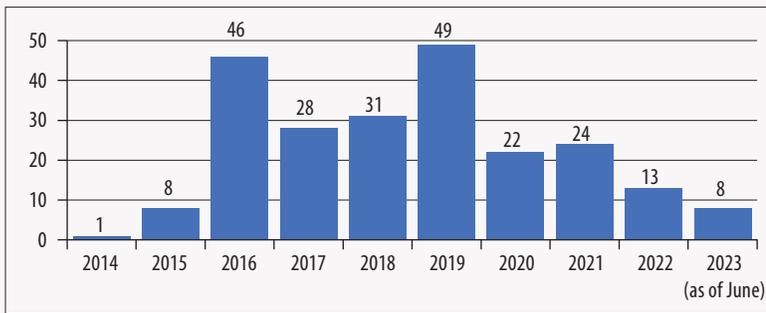
Table 3: Different categories of escalation protocol of RSC-covered factories

Category	As of December 2022	As of January 2023	As of February 2023	As of March 2023	As of April 2023
Not in escalation	945	914	912	873	1005
De-escalated	382	402	401	391	392
Stage 1	309	347	328	313	316
Stage 2	182	183	182	169	170
Total covered factories	1818	1828	1823	1823	1883

Source: RSC monthly reports.

¹Ineligible factories refer to factories that have been deemed ineligible for conducting business with signatory companies of the RSC due to their failure to implement adequate workplace safety measures as per the CAPs.

Figure 2: Number of factories made ineligible over the years by Accord and RSC



Source: RSC website.

preparation of this brief, several ineligible factories, which had become ineligible as a result of refusing to implement mandatory, time-bound safety repairs and renovations, were found to be operating at full capacity. It would be worrisome if these factories continued their operations by subcontracting to other facilities, especially if they subcontract to other RSC factories. As per the agreement, in case RSC factories are announced ineligible, UD for the factories would be annulled by BGMEA, which means they would not be able to export. Therefore, it needs to well be investigated whether BGMEA is effectively fulfilling that. At the same time, exploring alternative mechanisms to ensure compliance or shut down these factories (while ensuring the workers receive full severance according to Bangladeshi law and consistent with the Accord agreement) is crucial.

Table 4: Status of remediation during Accord and RSC period

Category	Status of Accord (as of January 2020)	Status of RSC (as of April 2023)	Changes after Accord
Covered factories	1645	1887	+245
Remediation progress	91%	92%	+1%
Fully remediated (initial)	273 (17% of total covered factories)	515 (27% of total cover factories)	+242
More than 90% remediated (initial)	1173 (71% of total covered factories)	1317 (70% of total cover factories)	+144
Number of factories closed	156	-	-

Source: Accord and RSC Website.

On a different note, while RSC covers 1,887 factories, Nirapon covers approximately 350 factories (with the possibility of significant overlap between the two initiatives), and RCC covers 659, there are at least 856 RMG factories (3,752-2,896=856) which are not under the purview of any inspection mechanism at present.² Hence, a significant number of factories (at least 22.8 per cent) remain uncovered by any private or public monitoring initiatives. A dedicated focus should be on how these factories can be brought under a safety mechanism to effectively address their compliance and safety concerns.

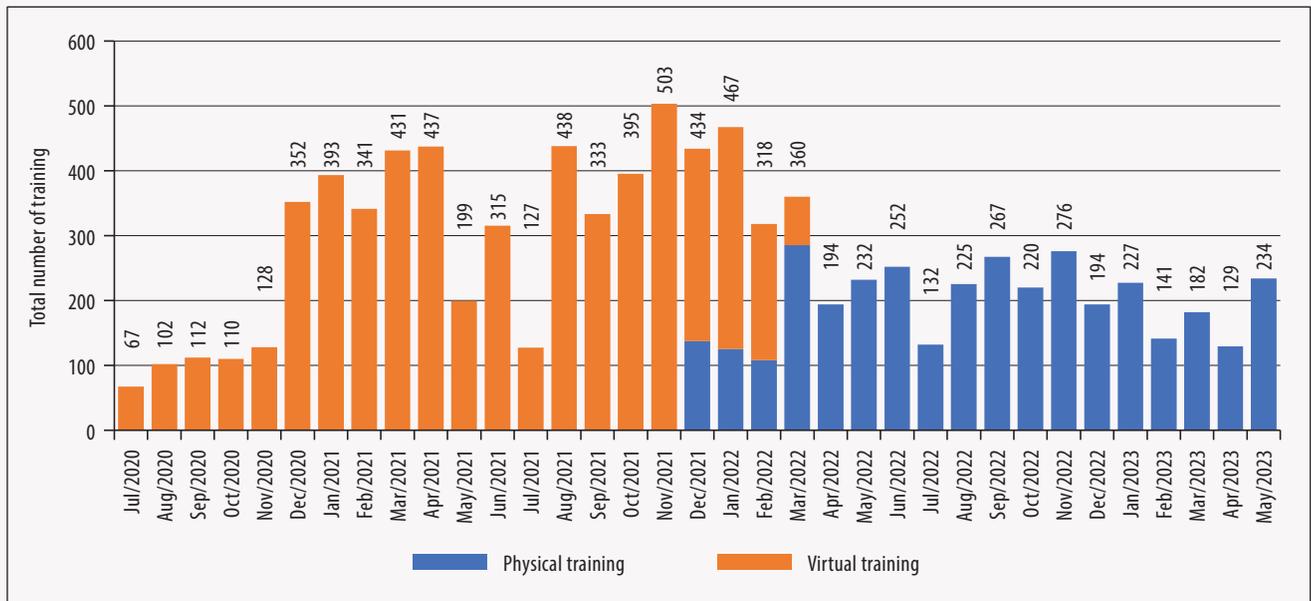
4.3 Progress on Safety Training

Providing safety-related training to the management professionals and workers of RMG factories is a crucial responsibility of the RSC. To fulfil this task, the RSC organises mainly two types of training for workers and management of its covered factories. Among these activities, the '8-Session Safety Committee Training (SCST)' is a significant training session offered by the RSC. The training sessions cover essential topics such as the responsibilities of the Safety Committee in remediation, complaint handling, collaborative problem-solving, hazard identification, and safety monitoring system implementation. This particular session is exclusively provided to the safety committee members, comprising both management and workers.

Additionally, RSC arranges All Employee Meetings (AEM) in its member factories. During the All-Employee Meetings, the production in the factory is temporarily paused, and a presentation is delivered to all workers and management members present. The meetings introduce the Safety Committee members to the entire workforce and provide important information

²According to the Mapped in Bangladesh (MiB), there are around 3752 export-oriented RMG factories in operation in Bangladesh, as of May 2023.

Figure 3: Number of factories received training facilitated by RSC



Source: RSC monthly reports.

on identifying and mitigating safety hazards, emergency evacuation procedures, and utilising the RSC's Occupational Safety & Health Complaints Mechanism. Workers receive a booklet (published in Bangla and English) summarising the presented information.

The data reported by RSC shows the agency has been consistently facilitating training sessions for safety committees in its covered factories since it took over the responsibility of the Accord-inspected factories (Figure 3). During the initial period of RSC, all the training was held in virtual mode; hence, the number of training conducted each month was high. However, with the ease of covid restriction, RSC started physically conducting all the training.

According to the interviewed representative of the RSC, despite providing continuous training to safety committees, the RSC is receiving complaints from workers on issues that factory-level safety committees should have solved. This indicates that RSC's existing safety committee training has a scope for further improvement. RSC said it is already working on it. On the other hand, the interviewed workers and management representatives find the training provided to the safety committees facilitated by RSC beneficial. However, the interviewed factory management officials feel that the training must be conducted more frequently in factories. The workers' representatives expressed concerns about the effectiveness of conducting the training solely within the safety committees in ensuring overall safety. They claim that many factories form safety committees by selecting workers who serve the interests of management. Consequently, providing training exclusively to the safety committees may not effectively raise awareness among the general workers. Hence, conducting all-employee meetings (AEM) by the RSC would be a more effective approach to reaching the entire workforce. Currently, it seems that the RSC primarily focuses on the Safety Committee and Safety Training (SCST). To address the concerns raised by the interviewed workers' representatives, equal attention should be given to the implementation of AEM as well. Also, in the past, the number of factories that received AEM used to be published by RSC. However, now only the total number of workers covered through AEM is being reported by RSC. RSC should reconsider publishing the number of factories covered by AEM on a monthly basis.

4.4 Progress on Safety and Health Complaint Addressing

RSC has its own Occupational Safety and Health Complaints Mechanism. The workers and their representatives can submit complaints to RSC and are able to hide their identity if they are concerned about the potential risk of retaliation for reporting

Table 5: Number of complaints received and resolved by RSC

Month	OSH complaint					Non-OSH complaint	Total Resolved
	Engineering (structural/fire/electrical safety)	Working environment related*	Reprisal for having filed a complaint	Others	Total OSH		
January 2023	9	16	1	38	64	1040	-
February 2023	2	5	1	37	45	232	11
March 2023	1	5	1	39	46	111	20
April 2023	3	3	2	25	33	130	16

Source: RSC monthly reports.

Note: *(incl. COVID-19 related, unsafe drinking water supply, excessive heat, workplace violence, forced overtime, denial of maternity pay/leave rights, denial of sick leave, physical and sexual harassment)

information about violations at their factory. Once RSC receives the complaints, RSC assesses whether it falls within the purview of occupational safety and health (OSH) related issues. In case the complaint is related to OSH, RSC investigates to generate evidence on it and provide a remedy. In case the complaint is not related to OSH, RSC informs the complaint factory management, responsible brands and union signatories. In case the complaint is from factories outside the coverage of the RSC, it forwards the complaint to the DIFE.

According to the data reported by RSC, since its inception in June 2020 to April 2023, the agency has received a total of 4,259 complaints. Among these, 1,096 (26 per cent) of the complaints are specifically related to Occupational Safety and Health (OSH) matters. The remaining 3,212 complaints (75 per cent) are non-OSH-related. Also, as of the date, it has resolved a total of 468 complaints, which is 42 per cent of total OSH-related complaints. The monthly reported data shows that in the last three months (February- April 2023), RSC received 33 OSH complaints on average each month (Table 4). In the same period, on average, RSC has resolved 16 OSH complaints each month. In other words, more than half of the OSH complaints remain unaddressed as of yet, which weakens workers' interest in using the reporting tool to obtain remedies. It is important to review what types of OSH-related complaints the workers made, which are being resolved, and which are yet to be resolved. However, it is to be noted that the number of complaints received by RSC that fall under the coverage of the non-OSH category is significantly higher than the OSH complaints. In fact, in the month of January 2023, the number of non-OSH complaints was more than a thousand against only 64 OSH complaints (Table 5). Hence, DIFE and the brands should take appropriate measures in handling workers' non-OSH-related concerns.

As per one interviewed respondent, one key challenge of RSC regarding complaint management is managing the sheer volume of complaints they receive with limited human resources. Upon receiving a complaint, RSC first needs to categorise it accordingly. If the complaint pertains to OSH, they have to gather evidence to verify the validity of the complaint. In many instances, this involves physically visiting the factory to collect the necessary evidence. Due to this, it becomes challenging to process each complaint promptly with the available human resources.

5. A Review of RSC's Institutional Framework

Once the RSC was established as a permanent entity, it had to develop a comprehensive institutional framework to function effectively as a fully-fledged institution. When RSC assumed responsibilities over the Accord-covered factories, it did not have a fully organised and effective institutional structure. As such, at that time, it faced several challenges, some of which still persist.

RSC has made consistent efforts to establish itself as a comprehensive monitoring institution. It has successfully established dedicated departments, including IT, HR, and Accounts, to enhance the efficiency of its operations. However, the current data reporting mechanism of RSC suggests that further improvements are needed in the skills of its workforce. Therefore, it is

crucial to continue and expedite ongoing initiatives, such as recruiting highly skilled personnel, creating additional departments, and expanding collaborations. These actions are especially important considering the sensitive role RSC plays in ensuring workplace safety and compliance in the RMG industry.

One of the forthcoming challenges for RSC could be securing adequate funding to sustain and expand its operations. Currently, the organisation relies on external funding from brands and suppliers. To address this, RSC is exploring the implementation of a resource generation mechanism. However, reduced funding from brands could result in decreased accountability for upholding the binding obligations of Accord signatories at their supplier factories. Therefore, brands should reevaluate their approach to funding the RSC to ensure continued commitment to these responsibilities.

According to workers' representatives who were interviewed, workers' participation has been marginalised in the institutional structure of RSC, unlike in Accord. Workers' representatives argue that both brands and employers are essentially business entities, and this arrangement shifts decision-making power towards business interests. Furthermore, workers' representatives also express a sense of lacking technical knowledge to assess many of the decisions made by RSC. Consequently, they feel unable to actively contribute to the decision-making processes of the RSC, further undermining their involvement in the institution. Besides, the license of RSC has been issued under the Ministry of Commerce. According to interviewed workers respondents, workers leaders, due to their role, have greater comfort and easier access to the Ministry of Labour and Employment, not the Ministry of Commerce. Consequently, their ability to hold RSC accountable by raising concerns has become limited.

Previously, there were allegations of a lack of collaboration between RSC and the government agency DIFE. However, recent interviews suggest that improvements have been made in this regard. It has been reported that under the Government Coordination Council (GCC), established by the Ministry of Commerce, representatives from all three agencies – Ministry of Commerce, DIFE, and RSC – are now meeting regularly. RSC has also begun submitting monthly reports to DIFE and has made these reports available on its website. An agreement was reached to conduct joint inspections between RSC and DIFE. The joint inspections are expected to begin with the arrival of the new Inspector General (IG) of DIFE.

6. Conclusion and Recommendations

RSC's mandate is to play a vital role in ensuring the safety and well-being of workers in the RMG industry. The review of RSC indicates while the agency has made progress in fulfilling its mandated responsibilities, there is still much room for improvement. Continuous efforts, collaboration with stakeholders, and a proactive approach will be essential for RSC to effectively carry out its mandate and make lasting improvements in the industry's safety monitoring. Taking into account the challenges confronted by RSC, the following initiatives need to be taken by the RSC, DIFE, MoLE, and MoC on an urgent basis.

- a) The public disclosure of information regarding the RSC-covered factories needs to be comprehensive, regular, updated, and accurate. It is advisable to consider disclosing additional information, such as inspections against priority tables and the duration of factories in each escalation stage.
- b) RSC needs to focus on remedial measures in cases where progress made by the factories is rather slow, including the installation of fire detection and alarm systems and fire suppression systems. If factories fail to comply with these measures, they should be included in the escalation protocol. In the event that factories are unable to invest in these items due to high costs, RSC can inform policymakers and propose the implementation of appropriate incentives to support these factories in addressing the identified items. Brands should also be informed about this, as brands must pay sufficient prices to the factories to maintain safe workplaces as part of their responsible business conducts.
- c) The factories that are not under the purview of any institutional monitoring system should be included in the review mechanism under the ISU. RSC needs to ensure that these factories have no business relationship with the RSC-covered factories.
- d) Regular, full boiler inspections should be given an extended focus. The inspection findings should be publicly reported comprehensively, including at the individual factory level.

- e) A proper monitoring mechanism needs to be set up between RSC and the DIFE for factories that are found to be 'ineligible'. Unless these factories are taking measures for compliance-related issues, their license of operation should be cancelled and will not be renewed by the DIFE.
- f) Factories not covered by RSC should be closely monitored by public monitoring bodies. To achieve uniform monitoring standards for all factories, regardless of their monitoring agencies, there can be a mutual exchange of technical expertise between DIFE and RSC.
- g) RSC needs to speed up its verification and implementation of the grievance mechanism of a large number of OSH-related complaints made by the workers. The mechanism must be made capable of providing more timely remedies.
- h) DIFE and DoL need to set up an effective grievance mechanism for the large number of complaints made by workers on non-OSH-related issues. RSC could take responsibility for handling non-OSH complaints (such as payment of maternal benefits, harassment, etc. related issues; given the higher sensitivity, issues related to trade union registration could be kept out of consideration temporarily). Nevertheless, to do so effectively, the capacity of RSC's complaints-handling team must be appropriately strengthened.
- i) RSC should ensure regular follow-up inspections, especially after any incidents occur in the factories under its coverage.
- j) RSC needs to improve its training modules, structures, and implementation mechanism of safety-related training - the Safety Committee and Safety Training (SCST) and all-employee meetings (AEM). Along with the ongoing focus on SCST, more effort needs to be put in place on AEM in order to enhance maximum outreach of safety-related issues to workers. Also, regular evaluations programme should take place so that the effectiveness of these training can be understood.
- k) RSC's institutional structure needs to be reviewed- under the ongoing representation, the voices/views of workers are not properly reflected in the decision-making process due to structural, compositional, and technical concerns.

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