Building a culture of Occupational Safety and Health in the Ready Made Garment sector: analysis of the project model and main achievements

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Abstract

The paper analyses the achievements of the ILO project “Building a Culture of Occupational Safety and Health in the RMG sector” which is part of the broader “Improving Working Conditions in the Ready-Made-Garment Sector in Bangladesh” programme, launched in October 2013 following the terrible accident at the Rana Plaza. The project, aiming at improving awareness on the Safety and Health risks at workplaces in Ready Made Garment Factories, involved some 600 enterprises, roughly employing 1.5 million workers. The three-dimensional approach designed in the project, whereby local capacity is built in employers’ organizations, whose trainers are then deployed to companies to run training for factories’ mid-level managers, who in turn give awareness-raising sessions to workers is studied to better understand its weaknesses and strengths for eventual replication in other context and countries.
Building a culture of Occupational Safety and Health in the Ready Made Garment sector: analysis of the project model and main achievements
1. Introduction

An overview of the Ready Made Garment Sector and its contribution to socio-economic development in Bangladesh

The growth of the ready-made garment (RMG) and knitwear industry in Bangladesh has made a positive contribution to economic development, employment, higher incomes, and better skills in Bangladesh, and has also had a positive impact on eradication of poverty, empowerment of women and progress on the timely attainment of several Millennium Development Goals (MDGs). Nevertheless it is recognised the need for further improvements in occupational safety and health, working conditions and respect for labour rights (Bangladesh Sustainability Compact – follow-up meeting, 2014)\(^1\).

The Bangladeshi Ready-Made Garment (RMG) industry has grown over the space of a few short decades to become the second largest in the world. The RMG sector has become a key driver of the Bangladeshi economy and the nation’s development. RMG exports totalled US$28.09 billion in the fiscal year 2015-16, accounting for over 82 per cent of the nation’s export earnings and employing around 4.2 million workers (Enamul Hafiz Latifee, 2016, p.3)\(^2\), an estimated 65 per cent of whom are women (International Labour Organization, 2016)\(^3\). Workers in the Bangladeshi textile sector are predominantly young women with an average age of below 24; it is reckoned that 92.5 per cent of the female workers are aged less than 30 (Md. Mehedi Hasan Sikdar, 2014)\(^4\). Most of the labour force consists of young women from rural areas who move to the crowded suburbs of Dhaka and Chittagong to work in textile factories.

It is nevertheless important to emphasize the positive impact of the growth of the RMG sector in Bangladesh, not only on purely economic indicators, but also on indicators of social development. Recently, the state minister for labour and employment, Md Mujibul Haque, emphasized that inclusive business can play a vital role for success in the country’s readymade garment.

Also, the RMG sector in Bangladesh is contributing to an increase in the women’s employment rate, declining fertility, increasing age at marriage, and a rapid increase in girls’ educational attainment, both in absolute terms and relative to boys. Moreover, the albeit modest wages of these women help in enabling their parents to meet their essential needs or make it possible for them to send their own children to school (Kaniz Farhana, Md. Syduzzaman, Md. Shayekh Munir, 2015)\(^5\). Some studies have also shown that the impact of the growth of the sector on these indicators is greater than the results obtained by the conditional cash transfer programme, which has similar objectives (Rachel Heath, Ahmed Mushfiq Mobarak, 2014)\(^6\).

The living and working conditions of these women are far from easy: they work an average of 10 hours a day (8 hours + 2 hours overtime), six days a week, for around 80 USD a month. They often live far from their families, in barrack-like buildings close to the factories, sharing accommodation with large numbers of their workmates. Therefore, significant challenges arise: poor working conditions, discrimination, violence, a lack of labour rights and social protection are among the labour issues that need to be addressed urgently.

The Rana Plaza tragedy and subsequent mobilization

The loss of 1,136 lives when Rana Plaza collapsed on 24 April 2013 sent shockwaves worldwide.

Coming just months after the fatal fire at Tazreen Fashions, in which 112 died, it was clear that the Bangladeshi RMG sector had reached a crucial juncture. Business could not continue as usual. Fundamental changes relating to safety, inspection and compliance had to be made if the lives of over four million workers were to be safeguarded and the confidence of global buyers retained.

The ILO responded quickly to the Rana Plaza tragedy with a high-level mission to Dhaka at the start of May 2013, which agreed immediate and medium-term actions with the Government of Bangladesh and employers’ and workers’ organizations. These were integrated into the National Tripartite Plan of Action on fire safety and structural integrity (NTPA), which was developed following the Tazreen factory fire in November 2012. The ILO has since launched a US$31.4 million, three-and-a-half year programme funded by Canada, the Netherlands and the UK to support implementation of the NTPA and improve working conditions in the RMG sector.
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The Programme includes the following key elements:

1. Building and fire safety assessments;
2. Labour inspection reforms;
3. Occupational safety and health;
4. Rehabilitation and skills training. (International Labour Organization, 2016)

In this paper, the strategy undertaken to build a culture of Occupational Safety and Health at workplace level with the involvement of Bangladeshi employers’ organizations will be analysed to draw lessons for the future and eventually replicate the capacity-building model in other contexts.
2. The “Building a Culture of Occupational Safety and Health in the RMG sector” project

The “Building a Culture of Occupational Safety and Health in the RMG sector” project is part of the broader “Improving Working Conditions in the Ready-Made-Garment Sector in Bangladesh” programme, launched in October 2013 following the terrible accident at the Rana Plaza. As well as introducing programmes to examine the solidity of companies’ buildings and existing safety systems, and to strengthen State labour inspection arrangements, it seemed essential to organize training for mid-level managers and raise worker awareness regarding safety in the workplace. The project is based on the conviction that the creation and dissemination of a prevention culture is a fundamental factor in achieving a significant reduction in workplace accidents in the medium term. Obviously, the direct impact of the training in reducing accidents is difficult to measure, but there is evidence to suggest that training and awareness-raising initiatives are a key factor in improving indicators, even in the short term. (European Agencyy for Safety and Health at Work, 2001).

The project involved some 600 enterprises in the RMG sector out of a total of around 3,700 such enterprises active in Bangladesh. Roughly 1.5 million workers are employed in these 600 businesses (out of a total of around 4.2 million).

This is therefore a numerically significant project involving a large proportion of the major enterprises active in the RMG sector in Bangladesh and potentially benefitting a very large number of workers. The main difficulty for the project was in fact to plan a system that would reach the highest possible number of enterprises, and in particular the mid-level managers and workers of those enterprises, in an effective and efficient way. We therefore developed a model involving different levels of trainer training that would achieve the ambitious objective of running courses for at least 8,000 mid-level managers and awareness-raising sessions for 750,000 workers employed in 585 businesses in the RMG sector.

The project was developed in three phases:

1. Training trainers
2. Training mid-level managers
3. Information sessions for workers

The first phase of the project: training trainers

The first phase, which ran from August 2014 to November 2015, involved the training of approximately 120 trainers working within two powerful business organizations in the Bangladeshi Ready Made Garment industry, the Bangladesh Garment Manufacturers and Exporters Associations (BGMEA) and the Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA). The training was delivered through five blended workshops consisting of a distance component of around 30 hours and sessions at which the participants were present in person, lasting 25 hours. Roughly 20 trainers took part in each edition of the course.

The objective of the trainer training was to ensure that the trainers had, on the one hand, the technical knowledge required to run training sessions on specific technical topics and, on the other, the necessary skills to deliver interactive training sessions for an adult audience with the clear objective of identifying corrective actions that could be applied easily and at low cost to improve health and safety in the workplace.

The training material used in Bangladesh, which was gradually adapted to the local circumstances, was a teaching aid entitled “The Essentials of Occupational Safety and Health”, covering 25 workplace safety areas under two main headings: general concepts and specific risks (see box).
The training materials: The Essentials of Occupational Safety and Health

The training material used in Bangladesh was a teaching aid entitled “The Essentials of Occupational Safety and Health”, which was gradually adapted to the local situation. This material is used by the International Training Centre of the ILO as a ready-made package for business organizations wanting to set up a simple training service to foster safety in the workplace. The package covers 25 topics following a modular approach that is easily adapted to particular training needs and to the personal style of the trainer. The material consists of videos, animated cartoons, organized activities, PPTs, check-lists for daily use and documents of various kinds.

The 25 modules:

- General concepts
  - Introduction to safety and health at work
  - Management of prevention
  - Risk assessment
  - Accident Prevention and Reporting
  - Motivating Workers: Leadership and supervision
  - Work permits
  - Personal Protective Equipment
  - Safety and Health signalization
  - Emergency responses
  - Internal emergency plan
  - Ergonomics

- Specific risks
  - Fire and explosion
  - Confined spaces
  - Tools, machines and appliances
  - Hoists, lifts and bear
  - Trip, slip and fall
  - Work at height
  - Electricity
  - Radiation
  - Asbestos
  - Noise and vibrations
  - Drugs and alcohol awareness

Firstly, the material was reviewed by a Pakistani workplace safety expert, Dr Barlas, who tried to identify the elements that would need to be changed to fit the circumstances of the Bangladeshi textile sector. Secondly, the material was translated into Bengali by competent translators, with support from the Bangladesh Employers Federation.

The trainers studied and analysed all 25 modules contained in the training package.

Given the range and quality of the material, and its availability in Bengali, it will be useful for future reference in many other projects under initiatives taken by the ILO and other national and international agencies to promote safety in the workplace.
The 120 trainers underwent a certification process, with 85 per cent of them gaining the necessary qualification.

**The second phase: training mid-level managers**

Of the 100 or so trainers who participated in the trainer training and obtained certification, approximately 70 were employed as trainers for the second phase of the project.

During the second phase of the project, which ran from March 2015 to June 2016, four-hour training sessions were run for the 585 enterprises which were identified and selected by BGMEA and BKMEA among affiliated businesses interested in taking part. Most were large businesses, with an average of 3,500 workers, the minimum workforce being 900 and the maximum 10,000. The trainings were highly interactive, with the objective not only of providing information, but also of entering into dialogue to identify and discuss existing problems and examine possible solutions. Roughly 8,000 mid-level managers took part in these training sessions.

Participation in the project was free of charge for the enterprises concerned, but the willingness of management to release their mid-level managers from their daily duties for four hours obviously involved a significant cost to the companies and was therefore an indication of their interest in the matters under consideration. The target group of the second phase were mid-level managers. This category includes workers with a range of responsibilities, from HR managers, compliance managers and so-called “team leaders” or “chiefs on the floor” to production managers, i.e. managers responsible for production lines. Within the production set-up, these persons hold key positions when it comes to disseminating a prevention culture, either by setting an example for the workers under their supervision, or as an ideal link between workers and management.

As shown by various studies (Ethan Mollick, 2011), running training sessions for members of this group can have a much greater impact than organizing training for other categories.

Although the Essentials of Occupational Safety and Health package covers 25 areas, it was decided from the initial design phase to focus the factory-based interventions on a number of safety areas of vital importance for the RMG sector. Unfortunately, it was unrealistic to expect that the enterprises concerned would allow their mid-level managers to participate in sessions covering the entire spectrum of topics contained in the original training package; this would have necessitated at least 60 hours’ training. We therefore left out certain topics which, though no less important, were less relevant and less likely to have an impact in the short term.

**Topics chosen**

The topics chosen, in close consultation with the sector-related organizations concerned, were:

- Fire safety
- Electrical safety
- Ergonomics
- Chemicals and dangerous substances
- Personal protective equipment
- First aid
- Harassment and violence at work

Before the sessions took place, the enterprises were invited to choose from these seven modules the four they considered most important/relevant. Given the limited time available, this seemed a fair compromise between the aim of providing essential information to improve various aspects of workplace safety and the requirements of companies that were not willing to release a large proportion of their mid-level managers for more than four hours. It should be pointed out that some companies had already taken part in other projects, particularly relating to fire and explosion-risk prevention, and, in this area, some enterprises had already acquired basic knowledge and had conducted training sessions.
The third phase: awareness-raising sessions for workers

In the third phase of the project, "pills" of information were extracted as the basis for short, two-hour information sessions with at least 50 per cent of the workers of each enterprise participating in the project. According to the original project document, most of the mid-level managers who had participated in the four-hour training sessions in the second phase of the project were supposed to deliver the sessions targeting workers. As things turned out, it was more realistic and effective to identify a limited number of managers (three or four from each enterprise) to conduct the information sessions. Being a good trainer, or at least being able to communicate key messages to a large group of workers in two-hour sessions, is not something that can be taken for granted. Entrusting a limited number of persons with the task of delivering the message made it possible to develop their capacities for communication, and therefore organize far more effective sessions.

For many of the companies, the two hour sessions for workers were a new phenomenon. Again, the willingness of the managements to allow their workers to attend the training sessions needs to be duly acknowledged. In the garment sector, such participation means interrupting production work for two hours, with all the cost involved, in a highly competitive sector. A period of two hours does not really constitute a training session; an awareness-raising session is a better term. As well as the importance of the information conveyed, it is important to acknowledge the significance of such meetings, as they were the first sign of an openness to encourage workers to participate actively in plans to improve safety in the workplace. In Bangladesh, the idea of workers sharing concerns with their supervisors about unhealthy or dangerous working conditions is still taboo in many companies, carrying the risk of a worker being seen as a trouble-maker and therefore being dismissed from their job.

The ambitious objective of this phase was achieved: 15,000 information sessions for around 750,000 workers were conducted in the 585 beneficiary companies.

Many workers (both male and female) said that this was the first opportunity they had ever had to meet and discuss the issue of workplace safety.

Topics chosen

The topics chosen, in close consultation with the sector-related organizations concerned, were:

- Fire safety
- Electrical safety
- Ergonomics
- Chemicals and dangerous substances
- Personal protective equipment
- First aid
- Harassment and violence at work
This third phase of the project was completed on 15 June 2017 and it is still too soon to draw up an assessment of the extent to which the training objectives were fully achieved.

<table>
<thead>
<tr>
<th>Initial target</th>
<th>Achievement</th>
</tr>
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<tbody>
<tr>
<td>100 trainers</td>
<td>114 trainers</td>
</tr>
<tr>
<td>400 training sessions</td>
<td>405 training sessions</td>
</tr>
<tr>
<td>400 companies</td>
<td>585 companies</td>
</tr>
<tr>
<td>7500 mid level managers</td>
<td>8038 mid-level managers</td>
</tr>
<tr>
<td>15,000 training sessions</td>
<td>16,000 training sessions (est.)</td>
</tr>
<tr>
<td>750,000 workers</td>
<td>800,000 workers (est.)</td>
</tr>
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3. Key factors underlying a successful project in the area of occupational safety and health

The three-dimensional model

The three-dimensional approach, whereby local capacity is built in employers’ organizations, whose trainers are then deployed to companies to run training for factories’ mid-level managers, who in turn give awareness-raising sessions to workers, proved to be an efficient strategy. It needs some fine-tuning, but could become a model for other sectors or countries.

Strengths of the three-dimensional model

The initial training of 120 national trainers, above all employees of employers’ organizations in the sector, provided a threefold guarantee: notwithstanding natural turnover (particularly high in employers’ organizations) and possible reorganizations of the workforce and their duties, it was possible to dispose of a sufficient number of trainers for delivering the training in the enterprises involved; secondly, the personnel involved in the project were not employed full time in delivering training in the enterprises, but were able to reconcile this additional duty with other tasks; finally, creating a pool of persons with competence in workplace safety within the employers’ organization ensured that, at least within the BGMEA and the BKMEA, there was an awareness of the centrality of occupational safety and health for the good of all workers and the development of the sector.

In addition, the model, the final objective of which was to train mid-level managers and raise the awareness of workers in the RMG sector, had the merit of germinating intermediate seeds, which could be regarded as ends in themselves and results additional to the specific objectives of the project. In the specific context of Bangladesh, where there is still a lack of persons with specific competences and good teaching skills in the field of workplace safety, the fact of having established a group of around 100 trainers who will be able to use the skills they acquired for purposes beyond the project itself is an important factor on which to capitalize.

The three-dimensional model makes it possible to reach a high number of final beneficiaries in a cost-effective way.

Weaknesses of the three-dimensional model:

There were a number of deficiencies and strategies that will need to be reconsidered if a similar project is to be repeated.

During the initial design of the project, it was hoped that the mid-level managers would be able to attend a longer training course of at least eight hours, i.e. a full working day. This would have enabled us to provide essential information on five or six topics (whereas only four were in fact covered in each enterprise) and give some notions on appropriate methodology for delivering the awareness-raising sessions for workers. Given that, in the space of four hours, it was not possible to explain in detail to the mid-level managers how to conduct the awareness-raising sessions, the idea of requiring each of the trained managers to play a part in raising the awareness of the workers for whom they were responsible also proved to be unachievable. The strategy was therefore modified: a (limited) number of mid-level managers were identified in each enterprise and it was they, with initial support from the BGMEA and BKMEA trainers (at least in the first training session), who undertook to conduct the awareness-raising sessions. On the one hand, this policy of specialization ensured that the training sessions were of higher quality, and probably that the message conveyed to the workers was more effective. On the other, the effort involved in preparing adequately for delivering an awareness-raising session required in-depth study of the materials on the part of the mid-level managers and certainly ensured that they more thoroughly absorbed the content and the values expressed. There is nothing new in the theory that people learn more easily by doing or building something than by passively listening.

Objectives expected from the proposed model

In this regard, it should be emphasized that the training methodology adopted at all three levels, though completely different in duration, depth of content and training materials used, was intended to be very practical.

For the BGMEA and BKMEA trainers, the final objective was that they should be able to conduct training sessions on specific topics, but with the capacity to adapt the sessions and materials used to the particular audiences they were facing. An
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The essential quality of a trainer is in fact to be able to detect the participants’ level of knowledge through conversations with the enterprise’s coordinator and the workers concerned, in the first few minutes of the course, and be able to adapt his or her intervention accordingly.

- **120 Trainers**
- **8,038 Mid-Level Managers**
- **800,000 workers**

For the **mid-level managers**, the objective was, on the one hand, to teach or go over some fundamental points of knowledge; on the other, to emphasize the key role that mid-level managers have to play as links between management and workers (see below) and to identify small, concrete actions that could be undertaken at low cost to improve workplace safety.

Where the **workers** were concerned, the objectives were, on the one hand, to measure their level of knowledge before and after the training, i.e. to establish a base-line and be able to assess the knowledge they had acquired, even as a result of short training exercises. Of course, if the starting point was particularly low, the learning curve would be particularly steep. But a further objective of these awareness-raising sessions was to give a voice to these workers and make it clear that everyone in a company can, or rather must, contribute to improving workplace safety, and that therefore active participation on the part of workers is essential in identifying possible risks and critical points. In the Bangladeshi context, this cannot be taken for granted. Finally, the sessions also served to bring to light problems which can be resolved by management at no great cost.

In the future, a bigger role should be planned for safety committee members, who, provided they are well trained, are well placed to be used as company trainers, especially if the aim is to achieve greater continuity of training, rather than have ad hoc, one-shot interventions. This was not possible as company safety committees are being established only very slowly and there is still a need to clarify their functions and composition before they can become truly operational, including in the field of training and awareness-raising.

**Involving the country’s employers’ organizations**

As a United Nations agency with a tripartite structure, the ILO enjoys a privileged relationship with national employers’ confederations. These confederations represent the interests of businesses at national and inter-sectoral level. Their membership includes other sector-related or local business associations and — normally — large companies. In many emerging countries, these confederations are not necessarily the largest organizations or those most capable of influencing national policy-making. In the case of Bangladesh, the Bangladesh Employers’ Federation is a lean but competent organization, and can count on good infrastructure, being connected with the Metropolitan Chamber of Commerce and Industry of Dhaka (MCCI), with which it shares offices, staff and a general secretary. In particular, the political intuition and far-sighted leadership of the general secretary ensured that the BEF played a key role in the success of the project. The ILO has always maintained close relations with the BEF, which understands the ILO’s rules and objectives and has acted as a filter for the requests and positions of the powerful employers’ associations in the garment sector: the Bangladesh Garment Manufacturers and Exporters Associations (BGMEA) and the Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA). The BGMEA and BKMEA are two very influential players on the national economic and political scene. Their luxurious headquarters, large permanent staffs, the visibility of their presidents in the national and international media, the fact that they have offices at the airport in Dhaka, as well as facilities in the production centre of Chittagong, are all clear indicators of the economic and political weight of these institutions.

The BGMEA and, subsequently, the BKMEA have from the very beginning played a fundamental role in the development of the RMG sector in Bangladesh, adopting a policy of carefully targeted lobbying. Within a system characterized by weak governance, alternation of the parties in power and a lack of stability, this has tended to maintain a commitment to privatization and export-led growth, and the creation of a successful industrial policy (FAISAL Z. AHMED, Anne Greenlaf, Audrey Sacks, 2014), which has been able to develop and reinvent itself, and has not been disrupted by the ending of the Multifibre Agreement.
Having the BGMEA and the BKMEA as key partners — through the filter of the BEF — was a key factor in the success of the project (F. Azim, 2015). The trainers we trained were for the most part permanent staff of the BGMEA and the BKMEA. The two organizations were therefore very supportive and willing to devote staff time and energy to ensuring that the project’s objectives were achieved. At the same time, giving the BGMEA and the BKMEA carte blanche in selecting the enterprises that would take part in the project, and setting a numerical/quantitative indicator for success rather than imposing restrictions or conditions on participation, gave the two organizations a proactive role. As a result, they felt a responsibility towards both the international community, represented by the ILO and the donor agencies, and towards the associated enterprises.

Finally, the enterprises concerned, not always willing to open their doors to external trainers, showed themselves to be sensitive to and interested in the project, thanks to their trust in the employers’ organizations with which they are associated. The project was not seen as being imposed from outside (a not uncommon perception in cooperation processes in which local actors are not directly involved), but as an opportunity for adding value to the enterprise (notwithstanding the time that would have to be devoted to the sessions). It would have been difficult to obtain the same result by training trainers belonging to the Ministry of Labour or the Labour Inspectorate, then trying to involve the various enterprises, especially with external international experts taking part.

Working with intermediary business organizations is a must for ensuring sustainability and building local capacity which will continue beyond the end of the specific project. At the same time, it was essential for the success of the project to generate a relationship of trust amongst the ILO and RMG officers involved in the project and the BEF, BGMEA and BKMEA decision-makers. This relationship has been cultivated over the years and was an essential factor in achieving satisfactory results in such a large-scale project.

Ownership at different levels

The BEF, BGMEA and BKMEA management were strongly encouraged to give their views and inputs in all phases of the project. Constant consultation on different aspects, ranging from the implementation strategy to training material personalization, was extremely important in ensuring buy-in and a feeling of project ownership on the part of employers’ organizations.

Meetings held at regular intervals made it possible to jointly identify a realistic strategy at each stage of the project. Giving a sense of ownership so that the project was perceived as a private-sector project undertaken with ILO support (and not vice-versa) was essential in ensuring serious, on-going commitment, as well as greater satisfaction in presenting the results of the project to all the stakeholders.

At another level, the process of appropriation of the training materials by the trainers concerned was important in ensuring the positive delivery and impact of fluid training or awareness-raising sessions. Such appropriation can be arrived at in various ways, such as:

- Feeling one is part of a community of trainers who have undergone the same training process, including a rigorous analysis of the skills acquired;
- The gradual adaptation of the training materials, in consultation with the trainers, taking into account the national context and the specific characteristics of the RMG sector;
- The possibility of personalizing the materials used and mode of delivery, without changing the key messages of the session, by for instance introducing additional photographs or videos, or organizing the session and experimenting with different materials to suit the needs of the audience.

Making trainers feel that they own the training materials is a key factor in instilling confidence in them and making them feel at ease when conducting the various sessions. For this reason, alongside the “principal” materials, there was a clear invitation for them to develop new materials, such as pictograms or role plays, in order to involve the trainers directly in extending the range of materials available for their interventions. Consequently, in addition to the planned project materials, a booklet was produced in Bangla, as well as pictograms and a simple flyer for distribution to all the workers. These items were entirely based on the ideas and support of the BGMEA and BKMEA trainers.

Targeting mid-level managers

The idea of focusing on mid-level managers, and in particular on “team leaders” or production managers, was not fortuitous. The relative youth of the workforce employed in garment factories, the average age being less than 24, needs to be borne in mind. The statistics show that the rate of workplace accidents for young people in the 18 - 24 age band is 50 per cent higher than in any other age group (Derbyshire County Council). The lack of adequate supervision is a factor in the large number of accidents. The young people are not experienced in the work itself, the environment in which they are working or the associated risks.
Supervisors play a key role in ensuring the health and safety of young people in various ways: ensuring that safe working practices are implemented; explaining their importance; themselves setting a good example; helping to promote a safety culture; rewarding safe behaviour. This being the case, supervisors need adequate technical training in workplace safety, as well as the ability to convey the fundamental notions to the workers for whom they are responsible. The project aimed to build the competencies of these mid-level managers, who are key players in identifying risks and changing worker behaviour. Focusing on this group can be more productive in terms of results than simply raising the awareness of workers or training managers.

Here is a list of the capacities that every supervisor should possess, and that the project has sought to enhance:

- **identifying** the hazards that young people may be subject to; young people are more vulnerable and often require more supervision than older workers;
- **adopting** effective controls/precautions for preventing accidents; for example, safety devices, barriers, prohibitions, inspections, random checks, information, training, procedures and supervision;
- **constantly improving** and simplifying safe working practices;
- **providing** information about and **instruction** in good practices;
- **demonstrating** the correct way of doing something;
- **allocating duties** on the basis of an individual’s abilities, and ensuring direct supervision until a given level of competence is reached;
- **checking** an individual’s understanding of correct practice and the precautions that need to be taken;
- **observing** an individual’s performance and, if necessary, repeating a practical demonstration to consolidate understanding;
- **listening** to and consulting with young workers, and encouraging their participation, for example in assessing risks;
- **communicating** information to young people as to where they can seek advice/assistance in the absence of a supervisor, and as to what they should do if uncertain;
- **ascertaining** that young workers are familiar with the emergency procedures;
- **supplying** all written procedures relating to safety in the workplace, as well as all necessary protective equipment and garments;
- **transmitting values**: explaining the importance of health and safety, promoting correct attitudes, raising awareness and setting a good example;
- **motivating**, by establishing a friendly relationship, facilitating and giving guidance;
- **overseeing**, organizing and, if necessary, disciplining.

**Originality of the training approach and flexibility of the training material**

The ITCILO and ILO Ready-Made-Garment Team in Dhaka created a large library of training material composed of both complex and simple tools for delivering training sessions on most topics relevant to the RMG sector to different types of audience and in different environments. Depending on the audience and the equipment available at company level, the trainers were able to choose the mix of training tools they considered most appropriate. In every case, the approach was geared to maximizing concrete results and ease of learning.

The theory speaks of realistic safety training programmes involving action-oriented words for employees and providing instructional aids such as charts, power point presentations, manuals, live demonstrations and group discussions. Realistic safety training leads to an effective safety culture. Actual performance of the proposed realistic training shows that it achieves better results(K.P. Karupannan, Dr. M. Arularasu, Dr. S.R. Devadasan, 2016, p.16)\(^\text{13}\).

**Monitoring and Evaluation system**

Given the large scale of the project, particularly in phases two and three, it was not easy to design a monitoring system to compile detailed information on all the training and awareness-raising sessions conducted in the different enterprises.

To this end, a functional M&E platform was constructed which served to gather information on the enterprises that took part in the initiative, the actual conduct of the sessions and the results of every session.

Quantitatively, in the **second phase** good-quality peer data was recorded regarding the essential characteristics of the enterprises, including the number of workers, both male and female, the nature of the business and the type of goods produced. Photographs of the training events were collected and lists of possible follow-up actions compiled. Where this final point was concerned, the information was modest or very anecdotal, and not gathered in a systematic way. Obviously, with a half-day training session it was not easy to identify many corrective actions, but it was hoped that it would be possible to identify at least a couple of actions for each enterprise.
In the **third phase**, the monitoring also included a system for assessing the knowledge acquisition of the workers, who participated in a quiz before the course and another afterwards. The percentage of correct answers increased from around 40 per cent beforehand to 80%, showing a high impact at least where the level of new knowledge acquired by the workers was concerned.

The project nonetheless has made a good contribution to the strategy of disseminating a safety culture at workplace level. Interviews with master trainers and beneficiaries highlighted that there was an improvement in knowledge on safety issues as a result of the training, and some corrective actions were undertaken. Further research in the field would be necessary to gauge the real extent and subsequent implementation of the low-hanging fruit and proposals gathered made by workers to improve safety in the workplace.

Finally, it should be stressed that, from the project point of view, more information and training should have been given to the BGMEA and BKMEA coordinators by the ILO regarding the documentation that must necessarily be fed back into the M&E platform. It is true that, with a project involving some 15,000 training sessions in phase three, top-quality reporting was hardly to be expected, but there was certainly room for improvement.
4. Conclusions

Going beyond the project: what have employers’ organizations got to offer. Recommendations for the future

The project highlighted the positive role that employers’ organizations can play in disseminating a culture of safety in the workplace in the RMG sector. There is an ever greater awareness on the part of business people that improving occupational safety and health is an incontrovertible necessity when it comes to meeting consumers’ expectations and remaining competitive in the medium term. Bangladesh has become a power to be reckoned with in the RMG sector due to a number of factors, which include shrewd industrial policies, but also extremely low labour costs and an absence of adequate safety systems. For instance, factories have been installed in some cases in buildings not originally designed for such use. The challenge in the years ahead, only now beginning to be recognized, is how to significantly improve working conditions by increasing both productivity and the quality of the goods produced. All this with the further complication that the likely automation of the production process, which may achieve the results referred to above, could have devastating effects on employment levels in the sector (International Labour Organization, 2016)\textsuperscript{14}.

The results achieved by the project are good seeds, probably in the right hands, that need to be sown and nurtured. It will be important to capitalize on what has been achieved. The employers’ organizations concerned now have trained personnel capable of providing quality training based on a tried-and-tested methodology. In a country which lacks trainers and experts in occupational safety and health, this capital must not be wasted, so it is essential that these persons continue to be at least partly employed in training and awareness-raising activities for businesses.

The trained mid-level managers, and above all the training coordinators at company level, are vital points of entry to the companies themselves. There is an almost unanimous consensus on the need for mid-level managers to be further informed and trained: the majority of them are ready and willing to help in improving health and safety in the workplace. We have already mentioned the key role of production managers and team leaders, who, by definition, must be able to set an example and pass on to the workers for whom they are responsible the key messages concerning safe behaviour in the workplace.

Finally, the workers, the real beneficiaries of the project, are in need of a training or awareness-raising system that goes beyond a one-shot intervention lasting just a couple of hours. The materials that have been developed should become part of a clear system that provides training for new recruits, regular “pills” of information/training for established workers and a general environment in which signage, video messages or messages over a speaker system contribute to a culture that significantly improves working conditions, with the awareness that safety is a necessity, and in fact the responsibility of the whole enterprise.

Paradoxically, it should be added that the RMG sector, the driving force of the Bangladeshi economy, which has come under the international spotlight following the Rana Plaza tragedy, is one of the sectors of the national economy in which workplace safety is best served. The RMG sector, already the locomotive of the national economy, could therefore become the locomotive for improving working conditions in other sectors that are not under the spotlight (because the goods produced are not generally exported), but in which the occupational safety situation is worrying, if not dramatic. Think for a moment of the construction sector, or transport, or ship-breaking. But, without straying too far from the RMG sector, the textiles and leather-goods sectors should also be given priority attention by the Government and international cooperation agencies.

With these considerations in mind, there are four macro-areas in which employers’ organizations could and should, with the support of the international community, be playing a front-line role in contributing to improving safety and health at work:

- The main area is that of workplace safety policy, in which the private sector must participate significantly and in an informed way in formulating the National Action Plan on OSH. In addition, while, as in many other countries, the Plan and related new regulations will provide for the obligatory training of safety officers, it is vital that the pioneering work done by the BGMEA and the BKMEA also be acknowledged. These organizations should be recognized and accredited by the Ministry of Labour as being qualified to provide training for safety officers in enterprises. On the one hand, this would be fair recognition for the work they have done; on the other, an efficient way of launching a large-scale training programme involving competent people who already have experience of delivering training in
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RMG-sector enterprises. Finally, being the first organizations accredited to perform this function would potentially give these organizations access to many resources.

- Where consultancy or information services are concerned, much could still be done by the employers' organizations for their associated enterprises. First of all, despite the large size of RMG businesses, most still do not have an OSH management system. The BGMEA and the BGMEA could create a service to support these enterprises in introducing OSH management systems. A complex, structured system, including a training component, is the best answer, and maybe the only way to achieve lasting results. This could possibly be backed up by a more embryonic service that would at least enable enterprises to get themselves assessed or carry out a self-assessment with a self-auditing tool and so understand the main areas in which they are deficient or non-compliant with regulations.

- As regards awareness-raising and training activities, it would be useful to establish a large-scale programme with business owners to illustrate the business case for OSH, with clear examples of cost-benefit analysis. And of course, once they are up and running, it will be essential to train and work with the new safety committees, which will have to be able to perform essential tasks at enterprise level, with a view to establishing an OSH improvement plan.

- Finally, as already mentioned, it must be possible to replicate the RMG-sector experience in other, less-structured sectors, characterized by greater informality, but which are even more needful of training and awareness-raising efforts. Where this is concerned, the BEF, as the national cross-sectoral employers' organization, could, with help from the international community, gradually establish a sort of service hub and provide, at least initially, a basic information and training service for enterprises operating in non-RMG sectors.

There is still a long road ahead. The challenge of improving occupational safety and health will probably be on the table for the next two decades in Bangladesh. The country has organizations, resources and individuals ready and willing to take up this challenge, not least to ensure a better future for themselves and for future generations.
Endnotes


9. Ethan Mollick, 2011. Why middle managers may be the most important people in your company, http://knowledge.wharton.upenn.edu/article/why-middle-managers-may-be-the-most-important-people-in-your-company/


