



RSC QUARTERLY AGGREGATE REPORT JUNE 2021

On remediation progress and status of workplace programmes at RMG factories covered by the RMG Sustainability Council (RSC)

Period covering March 2021 - May 2021

► Issue: 1.3

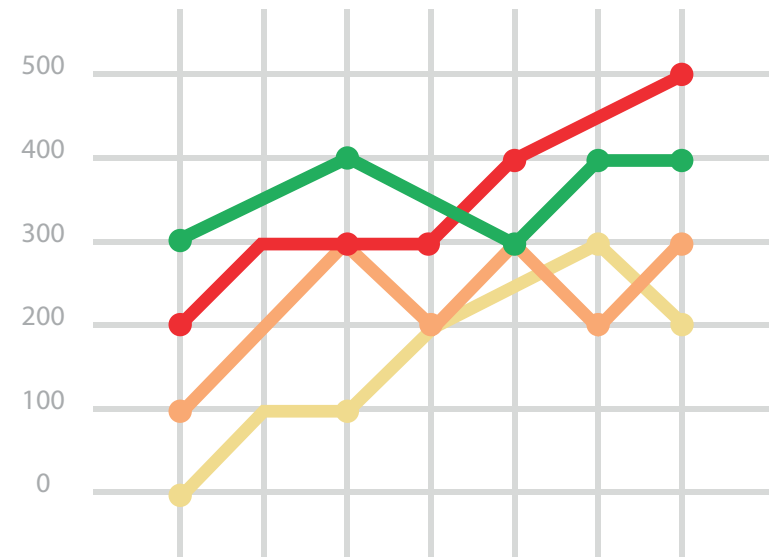


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KEY MILESTONE

INSPECTION & REMEDIATION PROGRAMME

see page
07&08

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INSPECTION

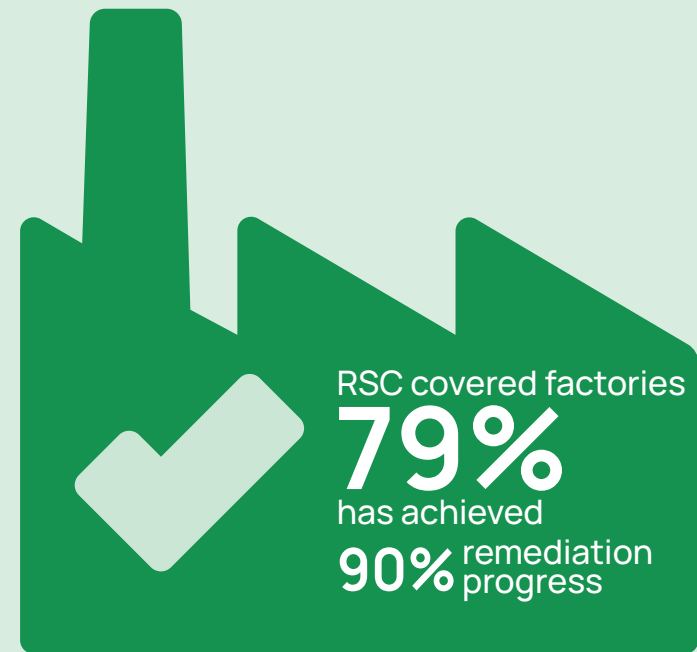
 **25** factories received 100% initial CAP pending verification inspection.

 **22** RSC Letter of Recognition  **64** factories recently listed and scheduled for initial inspection



REMEDIATION

 **10** factories were De-escalated




KEY MILESTONE

WORKPLACE PROGRAMME

see page
09&33

see page
36

SAFETY COMMITTEE & SAFETY TRAINING PROGRAMME

 **170** RSC Covered factories have completed the final training session #8.



COVID-19 COMPLAINTS

1 June 2020 to 31 May 2021



EXECUTIVE SUMMARY

The Ready-Made Garments {RMG} Sustainability Council (RSC) is an unprecedented tripartite initiative to carry forward the significant accomplishments made on workplace safety in Bangladesh. It is committed to transparency and public accountability. As part of the commitment, Quarterly Aggregate Reports (QAR) are published, to provide information on the progress of the implementation of remedial measures in the RMG factories covered by the RSC. This report shows that factories are continuing to make progress in the remediation. So far, 1,609 Corrective Actions Plans (CAPs) have been developed and responded to by factories and brands and technically approved by the RSC. The reporting period for this third QAR for RSC is 1 March 2021 to 31 May 2021. RSC compiles the generated data at the end of each month.

There are some 1,000+ factories that are designated as CAP behind schedule with a slow progress rate. The RSC is proactively working with the factory representatives and the technical team to lead those specific CAP items into completion. In this reporting period, RSC issued Letter of Recognition (LoR) to **22**¹ factories for 100% completion of initial findings. Since the inception, RSC has issued LoR to **98** factories. In order to ensure safety, it is imperative that remaining remediation is completed to include all initial findings. Through concerted effort, the RSC is working with the factories that are still lagging behind in executing the remediation. The Occupational Safety and Health (OSH) Complaints Mechanism (OSHCM) (handling of calls) is an investigative process where the remediation of new findings are continually monitored, until resolution has been reached.

Due to COVID-19 pandemic, inspections had to be suspended for six months from late March 2020. The RSC resumed onsite factory inspections in September 2020. The other non-physical operations related to CAP monitoring, engineering documents review, the Safety Committee & Safety Training (SCST) programmes were conducted through online platform to support the covered factories since the RSC formation.

Due to this, some of the progress data is reported including the Accord term to May 2021 and some of the updates are reported for the months of March 2021, April 2021 and May 2021², based on onsite inspections. At the same time the OSHCM has been fully operational and has received a record number of complaints. The RSC helpline has received much appreciation as workers found that very useful to get the complaints resolved.



¹As the government imposed countrywide lock-down to minimise the spread of Coronavirus, so the RSC has respected the government's instruction and did not schedule any kind of onsite inspection at the RSC covered factories in April 2021 and first three weeks of May 2021. Thus, it reflects in the reduced number of issuing the Letter of Recognition.

²Some of the progress data are reported since the Accord term as the RSC inherited the Accord's operation and functions in June 2020, the progress data consider of the events that occurred during the Accord term since 2013 with a view to ensure that the safety progress made by the Accord is maintained and potentially expanded by the RSC.

KEY MILESTONE UP TO 31 May 2021

Inspection

1. The “ICU Deep Dive” programme aims to investigate and understand any potential for improvement that will help factories to achieve 100% initial CAP completion. The programme is inspired by a continuous improvement cycle (plan-do-check-act). As of May 2021 in this reporting period, the RSC conducted 100% initial CAP pending verification inspection (Category 2 inspection) at **25** factories (March 2021: **16** factories, April 2021: **0** factories, May 2021: **9** factories). The factories which are ready to be recognised from Category 2 inspections are **7**. Under the ICU Deep Dive programme, RSC is closely working with **18** factories to support them in getting the LoRs, refer to the figure below.

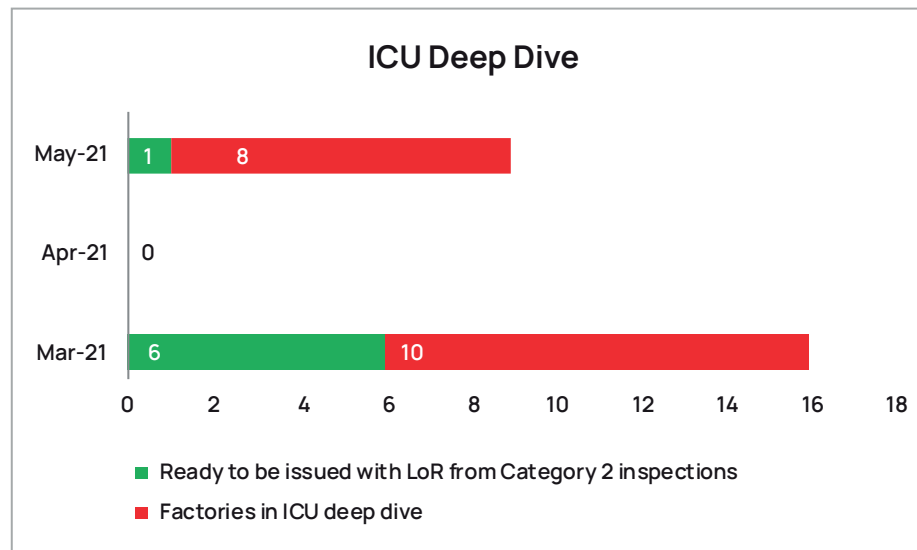


Figure 1: ICU Deep Dive update from 1 March 2021 to 31 May 2021

2. The ready to be recognised pass rate (LoR Pass Rate or RL Pass rate) from Category 2 inspection is **28%**, which was **13%** in the first quarter, **27%** in the second quarter, thus representing an increase of **1%** from last quarter, refer to the figure below.

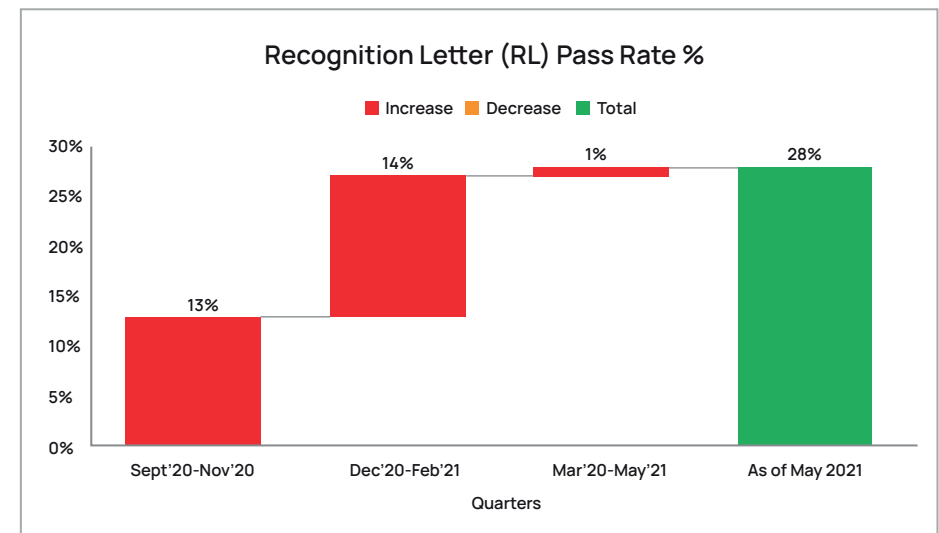


Figure 2: Correlation of LoR Pass Rate

KEY MILESTONE UP TO 31 May 2021

3. A total of **22** factories from all category inspections were issued with Letter of Recognition (LoR) in this quarter (**14** factories in March 2021, **8** factories in April 2021, no factories in May 2021) refer to the figure below.

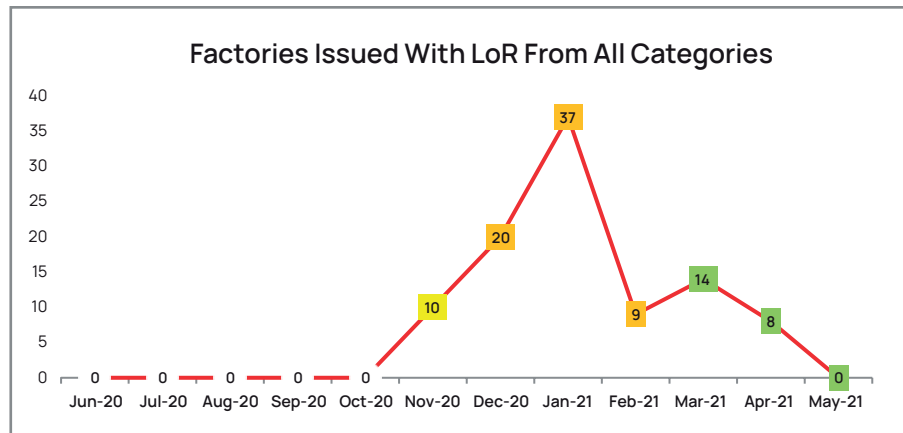


Figure 3: Factories issued with LoR from all category inspections following the Inspection Priority Categorisation table

- Owing to COVID-19 lockdown restrictions, no inspections were conducted in April 2021 and first three weeks of May 2021, thus only **333** inspections were conducted in **178** factories in this reporting period.
- Boiler visual inspections were introduced in March 2021 and after that, the RSC Boiler Safety engineers conducted inspections at **10** factories till May 2021.
- 64** factories were recently listed and scheduled for initial inspection.

Engineering

- The Pre-inspection meeting initiative enhanced the efficacy of initial inspection such that it reduced the delay in preparing the onsite documentations.
- Initiative on Pending Technical Queries (PTQ), organising workshops and online technical meetings involving RSC staff and factory concerns lead to acceleration of the remediation programme.
- The initiative taken to accelerate the acceptance of (D)EA design documents resulted to **58** covered factories getting {(D)EAs} accepted in three/or less submissions.
- 77%** of required (D)EA documentations were fully accepted through on-site verification.
- 177** factories yet to complete structural retrofitting that required remedial works have been finalised based on (D)EA. 40% Electrical SLDs were accepted among reviewed.
- 93%** covered factories received FADS design approval.
- 92%** covered factories received SUPS design approval.
- 1,241** covered factories are yet to have their fire alarm and detection system verified as installed as per standard.
- 1,055** covered factories are yet to have their fire suppression system verified as fully functional and installed as per standard.
- 526** factories identified through questionnaire responses to conduct Boiler Safety Inspections considering risk-based approach.

KEY MILESTONE UP TO 31 May 2021

09

Remediation

1. **79%** RSC covered factories have their initial remediation progress rate above **90%**.
2. **10** factories were De-escalated, **28** factories were escalated to Stage 1, **13** factories were escalated to Stage 2, and **2** factories were escalated to Stage 3.

Safety Committee & Safety Training (SCST) programme

1. **170** factories have completed all **8** training sessions, bringing the total to **514** since the RSC was formed.

Occupational Safety & Health Complaint Mechanism (OSHCM)

1. **327** new complaints were received; and **314** complaints were closed.
2. Total **149** complaints were received related to COVID-19 since the RSC inception.

1. ABOUT THE RSC

RMG Sustainability Council (RSC) is a national initiative to carry forward the significant accomplishments made on workplace safety in Bangladesh. It does not claim a regulatory or executionary role that stays unaffected with the Bangladesh Government which it supports and complements in its operational tasks.

The RSC conducts structural, electrical, fire & life safety and boiler safety inspections, support and monitor remediation, conduct safety training, and operate an independent occupational safety & health complaints mechanism available to workers in covered RMG factories.

The RSC conducts its workplace safety programmes at the almost 1,700 factories and envisages to cover all RMG exporting garment factories. The RSC aspires to also encompass industrial relations, skills development, business sustainability and environmental sustainability initiatives, United Nations (UN) Sustainable Development Goals (SDGs).

Through the work of the RSC, factories are able to complete their CAPs and ensure that all outstanding safety issues are remediated and verified as correctly fixed, and that Safety Committees, consisting of factory representatives of management and labour in the factories are equipped and empowered to monitor and address workplace safety on a daily basis.

1.1 The specific objectives of the RSC are

1. To promote, govern and oversee the implementation of Occupational Safety and Health standards and to verify the compliance with applicable safety standards in the RMG and related industries in Bangladesh especially in the areas of Structural Integrity, Electrical Safety, Fire & Life Safety and Boiler Safety.

2. To conduct inspections in the areas of structural, electrical, fire & life safety and boiler safety as well as inspections to investigate safety complaints, and special inspections following Safety Committee findings and industrial accidents, and eventually regarding industrial relations, skills development, and environmental standards; to monitor, verify and recognise remediation.
3. To maintain and further develop an extensive fire and building safety training programme to provide extensive and detailed training on Occupational Safety and Health in the factories.
4. To cover effective safety procedures and precautions, as well as enable workers to voice concerns and actively participate in activities to ensure their own safety and to develop a depository of know-how and information regarding existing safety hazards for the industry.
5. To promote, adopt and require compliance with existing or future national and international laws, regulations and standards for fire and building safety applicable for the RMG and other industries in Bangladesh, also through relationships with national and international stakeholders.
6. To maintain and further develop a publicly accessible database with regularly updated aggregated list of all suppliers in Bangladesh with specific details about factory safety standards, inspection reports, remediation status and other relevant non-competitive issues.
7. To supervise exporting RMG industry and related factories and permanently monitor safety, compliance, and sustainability of existing and new factories and to provide recognition of safe workplaces for garment employers and employees.

1. ABOUT THE RSC

8. To maintain and further develop a worker complaint mechanism operating with independence and free from interference from in-and-outside RSC, ensuring that workers from factories can raise concerns about safety and health risks in a timely fashion, safely and confidentially. To provide for quick and effective remedy protecting anonymity, real and perceived impartiality, protection from reprisal and independent decision-making in complaint resolutions.
9. To promote better Industrial Relations (IR), Skills Development, Welfare and Environmental Sustainability, Pollution Control, and other Climate Positive Initiatives.
10. To appoint qualified Safety Officers and support staff as required to implement the RSC programme, and to appoint a Board of Directors, Advisory Council, an Executive Committee and other necessary subcommittees to support the RSC governance and implementation of its programmes.

1.2 Reporting

Data management at the RSC can be divided into three key areas: factory related information, inspection and remediation data, and data pertaining to the workplace programmes. The Accord and the RSC have been working together with the Fair Factories Clearinghouse (FFC) in New York to securely manage data and publish relevant information through the Accord and RSC website in line with the commitment to transparency.

As of 1 June 2020, the Accord signatories' obligations with respect to inspections, remediation and workplace programmes at their supplier factories are being implemented through the RSC.

The RSC engineers, remediation case handlers, trainers and occupational safety & health complaint mechanism handlers are responsible for implementing the safety programmes, in accordance with the protocols and the procedures that were previously developed by the Accord.

1.3 RSC Reporting and Transparency

As part of its commitment to transparency and accountability, the RSC publishes the Quarterly Aggregate Reports (QAR) and with the following information:

- **The list of RMG and textile factories** covered by RSC and their safety remediation progress, together along with the status of the safety training programmes.
- **The list of ineligible suppliers**, for business with Accord signatory companies, for failure to implement workplace safety measures.
- **The list of factories handed over** to the Department of Inspection for Factories and Establishments (DIFE).
- **The complaints** raised by workers and their representatives through the RSC's Occupational Safety & Health Complaints Mechanism.

1. ABOUT THE RSC

1.4 Scope of the RSC

The RSC covers

- Cut, Make & Trim (CMT) process (final steps for all woven garments and knitwear),
- Secondary suppliers (washing, embroidery, printing) in integrated units (part of a CMT factory),
- Fabric manufacturers only in integrated units (part of a CMT factory),
- Home textiles (upon Accord Steering Committee's decision from 1 June 2018 on a voluntary basis): Textiles used for home furnishing, including but not limited to bedding, blankets, towels, cushion covers, curtains, tablecloths and mats, floor mats.
- Fabric and Knit accessories (upon Accord Steering Committee's decision from 1 June 2018 on a voluntary basis) Accessories made predominantly with fabric and knit materials, including but not limited to bags, hats, hair accessories, scarves, belts, gloves, ties, jewelry, and footwear.

RSC covers 1,696 factories with the status as noted below:

- **1,378** factories are **'active'**, meaning that at least one Accord signatory company is actively sourcing from there.
- **92** factories are **'inactive responsible'**, meaning that at least one Accord signatory company signatory was sourcing from there within the last 18 months.

- **85** factories are **'no-brand'**, meaning that they were covered under the 2013 Accord but had not completed the initial remediation until 1 June 2018, and have not been listed as **'active'** by signatories to the 2018 Transition Accord and RSC. The RSC continues to monitor and support remediation at these factories until remediation has been completed.
- **141** factories are **'pending closure'**, meaning that they are undergoing the RSC closure procedure. This procedure is initiated when a factory is required to be temporarily, permanently closed, or relocated.

Transition of Operations in Bangladesh from Accord to RSC

On 14 January 2020, Representatives of the BGMEA and the Steering Committee of the Accord on Fire and Building Safety in Bangladesh signed an agreement on transition to the RSC. Therefore, on 1 June 2020 the RSC inherited the operations, employees, policies and infrastructures of the Accord office in Bangladesh. The RSC was set up by three incorporating members representing each of the three constituents from Industry (The Shondhi Limited), Global Fashion Brands (Brands Association for Textile & RMG Sustainability in Supply Chains) and Global and Local Trade Unions (Trade Union Association for Textile & RMG Sustainability in Supply Chains). The RSC is now equipped to implement health and safety inspections and remediation monitoring, safety training and safety complaints handling functions. The RSC is committed to making key aspects of the programmes publicly available, including initial inspection reports and remediation progress through up-to-date CAPs.

The RSC operates within the regulatory framework of the laws of Bangladesh, closely cooperating with and supporting the relevant regulatory agencies of the Government of Bangladesh.

2. OVERALL STATUS OF RSC

Under the terms of the RSC, companies sourcing fashions from Bangladesh disclose all their RMG supplier factories and, on a voluntary basis, their home textiles and fabric & knit accessory suppliers in Bangladesh. All factories listed to RSC via FFC, receive initial and periodic follow-up inspections to monitor and verify remedial measures, refer to table 1.

Factories as of 31 May 2021

Covered factories	
Inspected	1,632
Recently listed and scheduled for initial inspection	64
Total covered factories	1,696
Factories no longer covered	
Closed	174
Relocated	170
Made ineligible for business with Accord company signatories	190 ³
Out of scope of the Accord/RSC programme	72
Total factories no longer covered	606
Total factories inspected or scheduled for initial inspections	2,302

Table 1: Total RSC covered and not-covered factories up to 31 May 2021

2.1 Inspection

After each factory is inspected for structural, electrical, fire & life safety and boiler safety, the inspection reports are shared with factory owners/concerns, the responsible signatory companies (Brands), and worker representatives. The factory owner/concerns and the brands are tasked to prepare a response to the CAP that details what remedial actions will be taken with a clear timeline and a financial plan. The RSC team of remediation case handlers provide support in the CAP development and implementation and work closely with the RSC engineers to provide any necessary technical guidance. Once a CAP is finalised by the factory owners/concerns and the Brands, it is submitted for review and approval. Prior to 1 June 2020, the Accord Chief Safety Inspector (CSI) was responsible for the review and approval of the CAPs. Since 1 June 2020, this process has become the responsibility of the RSC Chief Safety Officer (CSO) (for the time being this task lies with the MD). After approval, all 4 inspection reports and the CAPs are uploaded to the database jointly shared by the Accord and the RSC and are made publicly available on the RSC website.

³Up to 31 May 2021, among the 190 Ineligible factories, 180 factories were made ineligible due to not showing satisfactory remediation progress within the timelines set for the notice and warning phases. 10 factories were made ineligible due to belonging to the same RMG company group with the non-compliant factory before formation of RSC.

2. OVERALL STATUS OF RSC

2.2 Resumption of Inspection

RSC communicated with the factory owners/management that RSC will only conduct inspections at factories that have provided pictorial evidence of adequate COVID-19 measures to protect workers and the RSC engineers from COVID-19 infections. After getting confirmation from the factories on their COVID-19 preventative measures, the RSC conducted following inspections:

Types of inspections	1 March 2021 to 31 May 2021
Initial Inspections (all scopes)	39
FUIs Boiler	0
FUIs Electrical	70
FUIs Fire	30
FUIs Structural	36
Article 17	0
Boiler Pilot	2
Escalation	17
Factory Remediation Fund	1
Immediate Concern	0
Negative Suction	0
Post Incident	12
Safety Complaint	6
SCWT Finding	0
Settlements	18
Specific Issue	9
Closure	2
DEA	17
Pre-T&CVI Review	35
T&CVI	24
T&CVI Final Verification	15
Total Inspection Conducted	333
Nr Unique Factories Inspected	178
Nr unique factories pending initial inspections	64

Table 2: Total inspections conducted from 1 March 2021 to 31 May 2021

Boiler visual inspections were introduced in March 2021 and up to May 2021, RSC Boiler Safety engineers conducted inspections at **10** factories.

2. OVERALL STATUS OF RSC

2.3 ICU Deep Dive

The "ICU Deep Dive" programme aims to investigate and understand any potential for improvement that will help factories to achieve 100% initial CAP completion. The programme is inspired by a continuous improvement cycle (plan-do-check-act).

In addition to the general process, the RSC engineers applied several new steps under the "ICU Deep Dive" programme. The new steps included a detailed review of the CAP with an action plan that is then jointly dispatched to the factory management; and a phone call by the assigned Remediation Case Handler (RCH) to obtain information related to difficulties that the factory management are facing in terms of remediation. In addition, factory managements are encouraged to communicate with the RSC engineers to clarify any confusion and misunderstanding or knowledge gaps regarding the individual remediation requirements. The following is the snapshot of the result derived from the ICU Deep Dive since September 2020:

ICU Deep Dive (100% Initial CAP completion verification leading to Letter of Recognition)

Total number of factories covered in ICU deep dive and received better CAP :	18
Total number of factories ready to be recognised:	7
Up to May 2020, total number of Letter of Recognition issued:	275
Since RSC (June 2020 to May 2021):	98
Total (through the inspection & remediation since 2013 to 2021):	373 ⁵
Recognition Letter increased (from last quarter):	22

5.9% improvement in 3 months (March 2021 - May 2021). There were no inspections conducted in April 2021 and first three weeks of May 2021, so no LoR was issued in May 2021, thus it shows no significant improvement compared to the last quarter which was **18.8%**.

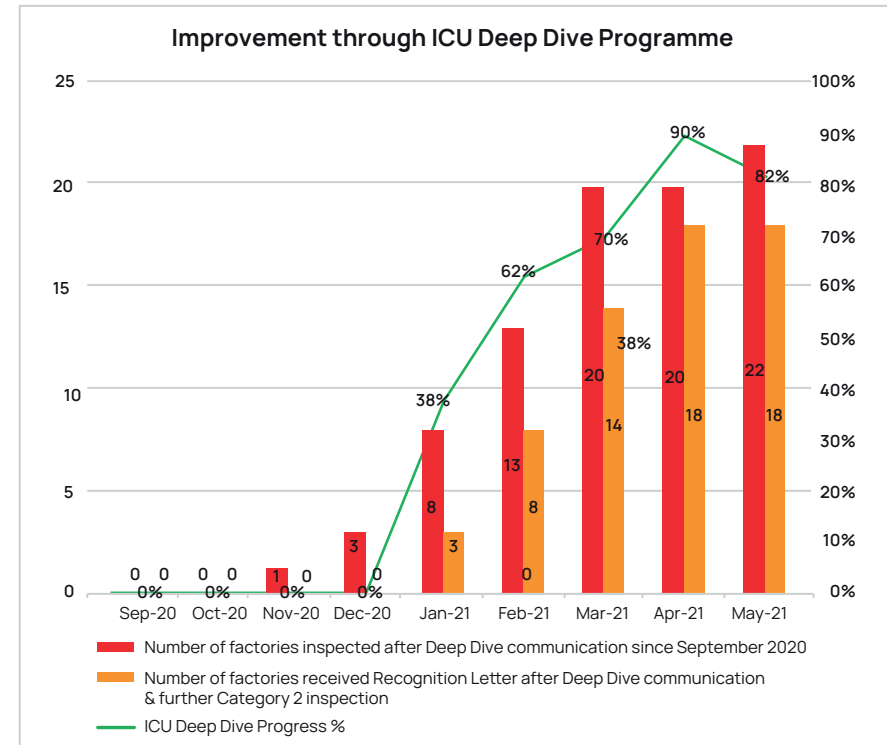


Figure 4: Improvement through ICU Deep Dive Programme during RSC period up to May 2021

⁵Since the Accord term to the RSC, total of **373** factories were issued with Letter of Recognition. As of May 2021, total of 362 factories are in CAP designation as Initial CAP completed. The difference of **11** factories indicates that these factories got Closed or Archived after the LoR was issued.

2. OVERALL STATUS OF RSC

While calculating the overall progress of the ICU Deep Dive Programme, RSC is considering all the factories that received a second initial 100% verification inspection after ICU Deep Dive communication. The current number indicates that 22 factories previously received Deep Dive communication and received a second initial 100% verification inspection from September 2020 to May 2021. The number of factories received LoR after ICU Deep Dive is 18. The 18 LoR represents that out of these 22 factories, 18 factories were able to correct all the initial CAP items during the second initial 100% verification inspection, which brings the total programme success rate to 82%, see figure above. The above figure is a cumulative representation of ICU Deep Dive communication and second inspection. The second inspection is following better communication and the LoR pass rate went higher after the second inspection. This indicates that the ICU Deep Dive programme is supporting the remediation process at a faster rate (see the table of Inspection Priority Categorisation). The Category 2 inspection or 100% initial CAP pending verification inspections are conducted at factories that reported their FADS/SUPS as already 'Corrected' or ready for full 'T&CVI/Final verification', and Structural remediation completed or ready for Retrofitting Verification. In some cases, some factories reported their CAP items as Corrected. However, the items were not found fully Corrected during the onsite Category 2 inspection.

Factories often find it challenging to remediate the following type of CAP items:

- CAP items related to Fire Alarm and Detection System (FADS)
- CAP items related to Fire Suppression System (SUPS)
- CAP items related to Fire Separation
- CAP items related to Passive Fire Protection to Steel Structure
- CAP items related to Single Line Diagram (SLD)
- CAP items related to Structural Retrofitting

As most of the CAP items require significant investment depend on factory consultants' initiatives, the progress of CAP items are often found slow and require multiple verification inspections by the RSC.

We have learnt that the success on this depends on:

- The improved communication & consultation by the RSC during design review and associated follow-up inspections to resolve un-remediated CAP items
- Initiatives by the factory management and their engineering teams
- Continuous improvement cycle {see below the ICU Deep Dive PDCA (plan-do-check-act) cycle for Recognition}.

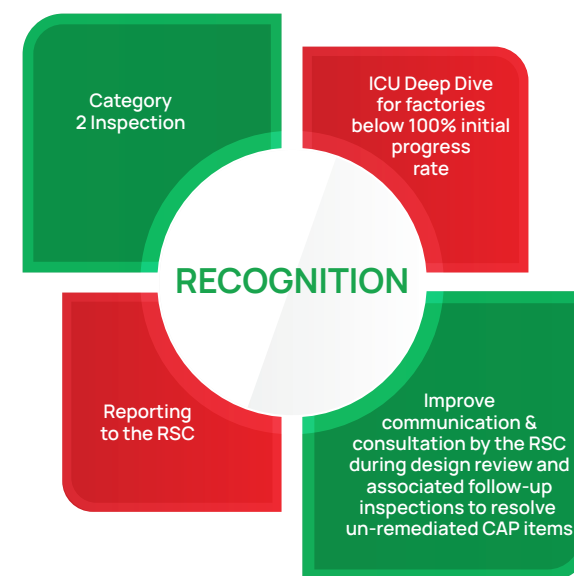


Figure 5: ICU Deep Dive PDCA cycle for Recognition

2. OVERALL STATUS OF RSC

2.4 Inspection Priority Category Table

The RSC maintains a strict and 'fair for all' inspection prioritisation criteria. The RSC welcomes enquiries from both Brands and Industry in relation to inspection scheduling. The RSC uses the categorisation to process each request to provide an inspection window, refer to the table below.

Inspection Priority Category Table

1	Inspections related to Industrial Accidents and Safety Concerns
2	Factories ready for recognition: 100% initial CAP pending verification, FADS/SUPS already Corrected or ready for full T&CVI/Final verification, and Structural remediation completed or ready for retrofitting verification
3A	Factories ready for pre-T&CVI
3B	Factories ready for full T&CVI, but not at 100% PV
4	Factories with key remediation outstanding/major delay: In Stage 1 with PV items, in Stage 2 where all NC timelines have passed, Special Escalation Inspections, and factories with Immediate issues outstanding (IP) or Safe Egress issues outstanding (IP)
5	Initial inspections
6	Structural priority factories: waiting for DEA verification, waiting for retrofitting verification, structural evacuation cases, or Structural items PV and Document status is Accepted
7	Other special inspections: FRF, OSH complaints/verification
8	Factories in linked buildings, compounds, or extensions to other priority factories

Table 3: Inspection Priority Categorisation

3. ENGINEERING

3.1 Initiatives taken by the RSC departments:

3.1.1 Pre-inspection meeting initiative:

To enhance the efficacy of the initial inspections, the RSC has updated the initial inspection procedure (SOP). The adoption of a pre-inspection meeting with factories and request for all available documents ahead of scheduling an initial inspection help the RSC to review all available information beforehand. This helps the RSC's engineers to evaluate the likely status of the factory building to prepare for a more informative initial inspection.

If the factory management sends a full set of documents based on a shared Pre-Survey Questionnaire, the factory will receive an initial inspection schedule based on the inspection queue. If the documents are found incomplete/missing, the inspection will be automatically scheduled at a later phase. The process can be represented as following:

"All set of documents = Initial inspection schedule based on queue"

"Incomplete or No documents = Later date of Initial inspection"

Purpose of Pre-inspection meeting initiative:

1. Better understanding of the facility before inspection.
2. Better preparation for the initial inspection by RSC engineers.
3. Reduce the number of incomplete initial inspections by having an overview of facility size.
4. Promote preparation of the factory representative prior to initial inspection & reducing the waiting time for onsite documentation.
5. Encourage factory & brand engagement via participation & communication.

3.1.2 Initiative to expedite the acceptance of (D)EA design review by Structural Safety Engineering Team:

The RSC structural safety engineering team has introduced a new initiative to expedite the acceptance of (D)EA design review in March 2021. To reduce the number of factory documents submission and increase the documents acceptance rate within three/or less submissions, the following steps were introduced in the design review process:

1. A mandatory meeting with factory management and the consultant is arranged after each review to explain the review comment and discuss the technical issue with the consultant.
2. A pre-submission meeting with the factory management and consultant is arranged if required. The consultant demonstrates during the pre-submission meeting that all review comments are addressed properly in the submitted documents. RSC does not receive the documents for further review if any review comment is not addressed properly.
3. If minor comments are found in the design documents after review, a meeting is scheduled instead of sending review comments to the factory, and the document is requested to be submitted within a very short period.

It has been decided that the counting of factory document submissions for the design review would start from 1 March 2021 though some of the factories have already submitted their documents. During the reporting period, a total of **58** factory design documents {(D)EA} were accepted in three/or less submissions, only 1 factory design document {(D)EA} was accepted in four submissions, and 5 factory design documents {(D)EA} are still being reviewed after being submitted three times.

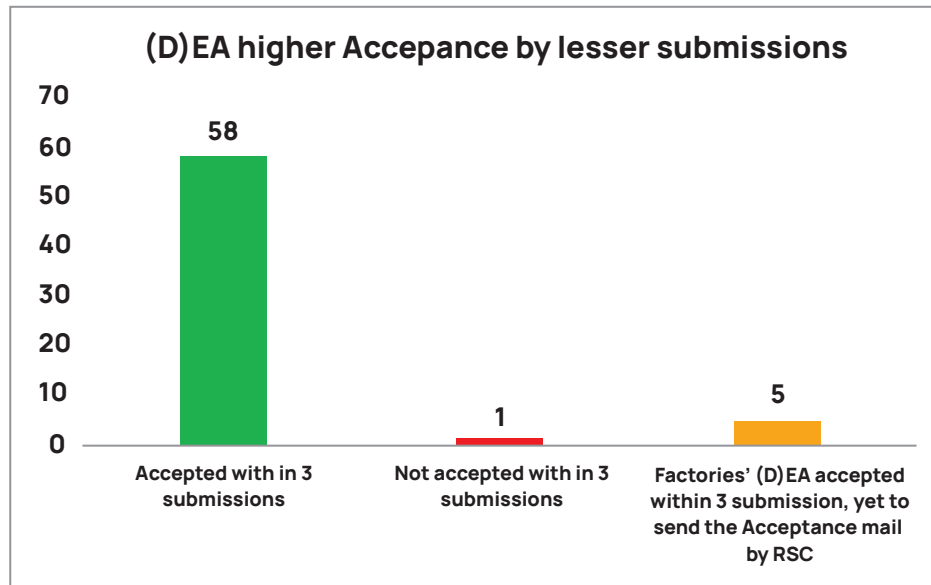


Figure 6: Analysis of factories' (D)EA Accepted by number of submissions

However, factories are sometimes unable to submit documents within a short period of time. The initiative to expedite the acceptance of (D)EA design review has led to a much higher acceptance rate. The increased numbers of technical meetings with factories have provided the opportunity to lessen the average review time. The payback here is undoubtedly increased design acceptance which is the desired outcome in our efforts to remediate factories and make them safer and compliant.

3.1.3 Initiative on Pending Technical Queries (PTQ):

Since March 2021, factories, in some cases responsible Brands, raise technical queries related to Structural/Electrical/Fire/Boiler scopes to the responsible RSC Remediation Case Handler (RCH). The RCH then discusses with the RSC Safety Engineer(s) who last inspected the factory. The engineer(s) assesses the technical query as per the protocols and standards that have been followed and then informs the necessary resolution to the responsible RSC Lead Safety Engineer, and further communicates to the RCH to share the resolution with the factory to implement. If the engineer(s) cannot find out the resolutions following the protocols and standards practiced, then the RSC Lead Safety Engineer organises a workshop with the factory management, factory consultant(s) and the RSC engineer(s). If the solution can be determined within standards/ protocols being practiced after the workshop being held, the lead(s) engineer(s) communicates the resolution with RCH to share the resolution with the factory to implement. If still the solutions cannot be agreed at following the protocols and standards from the workshops, the Lead engineer presents a recommendation including the background of the query, data analysis, possible solutions and recommended solutions to the RSC's Chief Safety Officer (CSO). As per the cooperation agreement between the Accord and the RSC, the RSC CSO shares the recommendation and discusses the case with the Accord Chief Safety Inspector (CSI) internally to finalise a resolution. The RSC CSO then provides the decision(s) to the factory management for further implementation in order to resolve the technical query.

3. ENGINEERING

3.1.4 Online Technical meetings with factories:

To establish a better communication with the factory during the COVID-19 pandemic, Engineering department has taken initiatives to conduct technical meetings, using online meeting platforms, with participants such as: Factory management, Factory technical persons, Factory consultants & Brand representatives, RSC engineering team, RSC RCH team. During these technical meetings, the engineering teams cover the following topics:

1. Technical queries from factory
2. Remediation difficulties of the factory
3. Technical suggestion & guidance with proper justification to the factory
4. Design guidance for (D)EA, SLD, FADS & SUPS
5. Supplementary advice on Technical Guidance Notes (TGN) relevant issues

From March 2021, the update of technical meetings conducted by the engineering teams are as follows:

- Structural Safety Engineering team: **356** meetings
- Electrical Safety Engineering team: **303** meetings
- Fire Safety Engineering team: **247** meetings

A total of **906** online technical meetings held during this reporting period.

3.1.5 Prioritisation of factories to conduct Boiler safety inspections considering a risk-based approach:

To select factories and prioritise Boiler Safety inspection, a few backgrounds preparatory tasks are followed to be accomplished ahead of inspection, such as, data collection by questionnaire, prioritisation using risk matrix, collection and review of available documentation (partial), external visual inspection, and reassessing prioritisation using risk matrix. The RSC has received a substantial number of responses to the questionnaire from the factories. The collected data are merged with the previous questionnaire prepared by the Accord, to create a full list of RSC's covered factories using the risk-based approach. The RSC's RCH team is liaising with the factories to help them submit the required data through questionnaire responses. A summary of the boiler data survey through questionnaire response is provided below:

- Total number of factories failed to respond to the previously sent questionnaire: **647**
- Total number of potential participants identified through questionnaire responses: **526**

3.2 Structural

The initial structural inspection is limited to what can be observed during a 1-day visual inspection of the building.

Required Approvals and Technical Support

The RSC engineers review submitted designs, technical information, calculations, and any other relevant information in order to determine if the proposals are compliant with associated legislation and standards.

Where the designs are non-compliant a written response is provided indicating areas of non-compliance in order that the designs can be amended accordingly. Where the design is compliant with appropriate legislation and standards, written confirmation is provided on the acceptance of the design prior to commencement of the remedial works. Design reviews are carried out for the following:

- (Detailed) Engineering Assessments {(D)EAs} for structural remediation.

3.2.1 Factories requiring (Detailed) Engineering Assessments (D)EAs

If the initial inspection indicates potential structural weakness, factories are required to undertake a structural (Detailed) Engineering Assessment {(D)EA}, including as-built drawings, engineering test reports, preparing load plans, and developing retrofitting drawings. (D)EAs are conducted by structural engineers or consultants hired by factories and submitted to the RSC for review. Once the (D)EAs are accepted, the factories are required to complete the structural remediation and retrofitting work.

- (D)EA pending submission by factory - Based on the findings of the initial structural safety inspection, the factory is required to undertake a structural (Detailed) Engineering Assessment.
- (D)EA pending review - The factory has submitted their (D)EA and the RSC is in the process of reviewing it.

- (D)EA accepted, pending on-site verification - The RSC has reviewed and accepted the (D)EA based solely on the documentation submitted as part of the (D)EA. The RSC is yet to conduct an on-site verification of the information submitted in the (D)EA i.e., to verify that the documents align with the physical building(s). (D)EA fully accepted - All required (D)EA documentation has been accepted and verified by the RSC to be in alignment with the physical building(s). Structural retrofitting can commence.
- (D)EA partly accepted, partly pending submission by factory/review - The RSC reviewed the (D)EA and accepted part(s) of it e.g., the (D)EA of one building part of a compound with several buildings. The remaining part(s) of the (D)EA must be (re-)submitted and reviewed. Structural retrofitting based on the accepted part of the (D)EA can commence.

(D)EA Status as of 31 May 2021	
Factories where conducting a (D)EA is required	1,601
Pending submission by factory	138
Pending review	29
Accepted, pending on-site verification	91
Fully accepted i.e., on-site verification revealed alignment between (D)EA documentation and the physical building(s)	1,228
Partly accepted, partly pending submission by factory/review	115

Table 4: Overall (D)EA status up to 31 May 2021

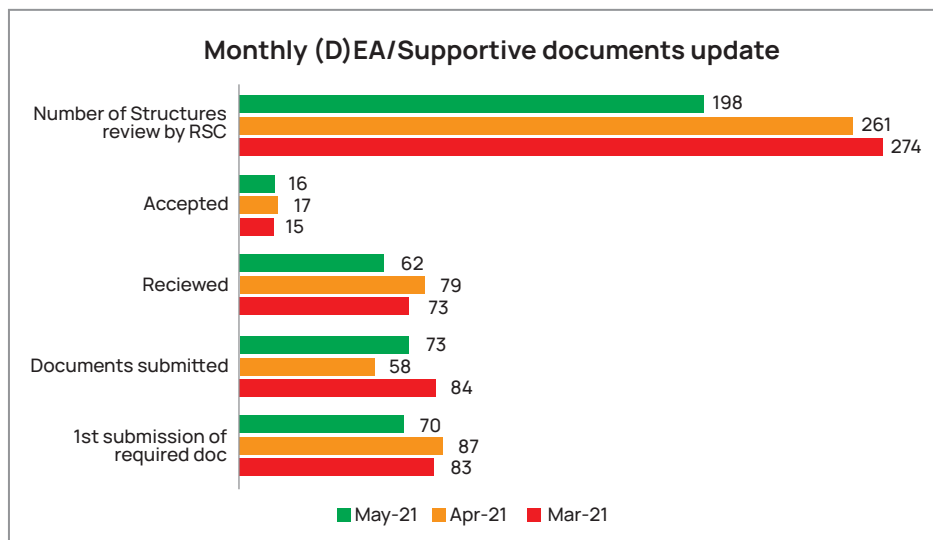


Figure 7: (D)EA/Supportive documents update of March 2021, April 2021 & May 2021

During this reporting period, the monitoring of the number of structures reviewed in factories and the number of first submissions of documents required were continued as introduced in the last quarter.

For the reporting period, **77%** of required (D)EA documentations were fully accepted through on-site verification up to 31 May 2021.

3.3 Electrical

The initial fire and electrical inspections are scheduled on the same day and take approximately one full business day to complete.

Required Approvals and Technical Support

The RSC engineers review submitted designs, technical information, calculations, and any other relevant information in order to determine whether the proposals are compliant with associated legislation and standards. Where the designs are non-compliant a written response shall be provided indicating areas of non-compliance in order that the designs can be amended accordingly. Where the design is compliant with appropriate legislation and standards, written confirmation shall be provided on the acceptance of the design prior to commencement of the remedial works. Design reviews shall be carried out for the following:

- Single Line Diagram (SLD) for the electrical installations.

3.3.1 Why SLD is required

- Eliminate hazards from the system (fire-hazards, shock-hazards)
- Maintenance
- Root cause identification of electrical hazards
- Fault analysis
- Load analysis
- Periodical testing
- Ensuring electrical safety at the workplace.

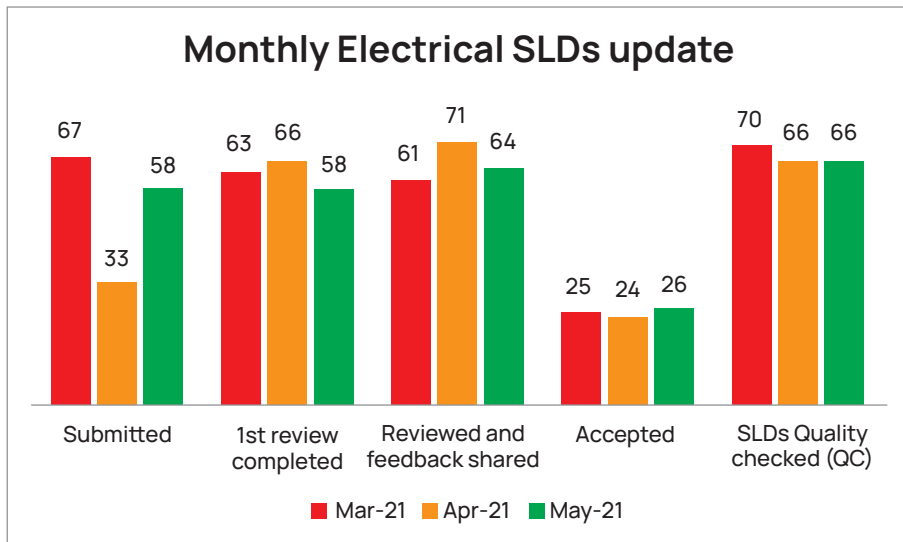


Figure 8: Electrical SLD update of March 2021, April 2021 & May 2021

- Total Electrical SLDs reviewed till 31 May 2021: **4,280**
- Total Electrical SLDs accepted till 31 May 2021: **1,714⁶**

3.4 Fire

The initial fire and electrical inspections are scheduled on the same day and take approximately one full business day to complete.

⁶In cases if the as-built conditions are found to be modified significantly after follow-up inspections as required, then it will reflect on the status of accepted SLDs. The acceptance number of Electrical SLD decreased from last quarter.

Required Approvals and Technical Support

The RSC engineers review submitted designs, technical information, calculations, and any other relevant information in order to determine whether the proposals are compliant with associated legislation and standards. Where the designs are non-compliant a written response are provided indicating areas of non-compliance in order that the designs can be amended accordingly. Where the design is compliant with appropriate legislation and standards, written confirmation are provided on the acceptance of the design prior to commencement of the remedial works. Design reviews are carried out for the following:

- Designs, Calculations, Specifications, Listed Components and drawings of the Fire Detection and Fire Protection Systems (fire alarm, sprinkler, standpipe, hydrants)

3.4.1 Factories requiring Fire Design and Drawings

The Fire & Life Safety inspections at the factories may result in the requirement of the factory to install a fire alarm & detection system and a fire suppression system. The design drawings for these systems must be submitted for review and acceptance prior to installation of the system to ensure they meet the required standard. Prior to 1 June 2020, the Accord CSI was responsible for the review and approval of the fire systems' design and drawings; starting 1 June 2020, this process has become the responsibility of the RSC CSO.

FADS & SUPS design documents status as of 31 May 2021	Fire Alarm and Detection System (FADS)	Fire Suppression System (SUPS)
Factories where FADS/SUPS is required	1,616	1,327
Pending Submission	85	78
Pending Review	33	23
Accepted	1,498	1,226
% Of Acceptance in total⁷	93%	92%

Table 5: Overall status of FADS & SUPS design documents up to 31 May 2021

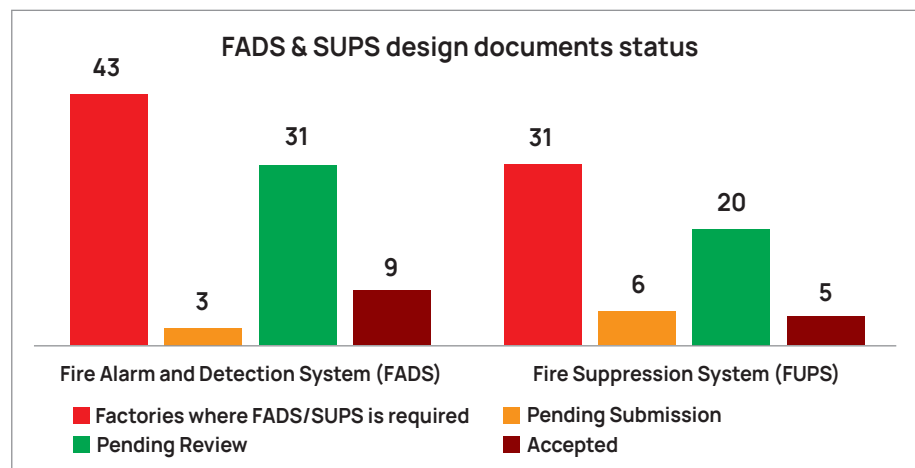


Figure 9: FADS & SUPS design documents update from 1 March 2021 to 31 May 2021

⁷The acceptance percentage decreased from last quarter as new factories were added in this quarter which are required to submit their design documents.

3.4.2 Status of installation of fire detection and suppression systems

Once the fire systems' design is accepted, covered factories are required to follow the steps described below:

- 1. Commence the installation of the fire system(s):** Components of the fire detection and protection systems can be installed by using local components/materials, which are available immediately, where supporting evidence is provided that confirms that they are compliant with relevant standards and tested and certified accordingly by a third-party accredited independent testing laboratory. For example, compliant cabling, the conduits, the pipes, and fittings of a sprinkler system can be purchased locally and installed whilst waiting for the imported components to arrive. For fire system components that need to be imported, the factories need to open a Letter of Credit (LC).
- 2. Undergo a pre-Testing & Commissioning Verification Inspection (Pre-T&CVI):** On-site documentation and equipment review. The goal of such a Pre-T&CVI on-site review is for the engineers to determine whether the factory is ready for a fully functional T&CVI. Pre-T&CVI reviews were introduced by the Accord in May 2019 in an effort to increase the number of factories that 'pass' the T&CVI - meaning that the fire systems are found to be adequately installed to standard and fully functional.
- 3. Undergo a full T&CVI:** The goal of this inspection is to ensure that the systems are fully functional and installed to standard. Where possible, the engineers conduct the T&CVI of both the fire detection and alarm system and the fire sprinkler system during the same inspection at the factory.

3. ENGINEERING

FADS & SUPS installation status up to 31 May 2021	Fire Alarm and Detection System (FADS)	Fire Suppression System (SUPS)
Factories where the fire system has been verified as adequately installed to standard and fully functional	302	196
Factories pending a Final Verification Inspection	26	17
Factories pending Testing & Commissioning Verification Inspection (T&CVI)	222	160
Factories at the stage of pre-T&CVI on-site documentation & equipment review	402	301
Factories where the installation of the system is ongoing	536	512
Factories where the installation is yet to commence	55	65

Table 6: FADS & SUPS installation status up to 31 May 2021

3.5 Boiler

Between 2018-2020, the Accord ran a Pilot Boiler Safety Programme at Accord-covered factories. Initial boiler safety inspections conducted at 20 Accord-covered factories revealed significant boiler safety hazards, including non-compliant or missing boiler components/parts and a lack of certification. The boiler safety findings have been included in the factories' CAPs. Boiler safety has been integrated in the RSC's inspection and remediation programmes, which means that all factories covered by the RSC will receive boiler safety inspections.

The RSC's Boiler Safety Programme was launched in December 2020 as an integrated part of the RSC's inspection programmes. The key achievements are:

1. 5 additional boiler safety engineers have been recruited.
2. Onsite training on Boiler safety inspections from Modern Erection Ltd (MEL) has been commenced.
3. Finalised questionnaires have been sent out to listed factories to collect boiler data in order to create a list to prioritise boiler safety inspection.
4. External visual inspection schedule has been prepared for the **75** factories identified by the Accord CSI. A prioritisation list has been prepared considering a risk-based approach for both the pilot programme factories and this identified **75** factories by the Accord CSI.
5. External visual inspection commenced from 16 March 2021.
6. Internal training for the newly recruited engineers has commenced.
7. Draft versions of the boiler safety inspection technical guidelines have been compiled.

Having started the external visual inspection from 16 March 2021, the RSC boiler safety engineers conducted boiler safety inspections at 10 factories (March 2021: **3** factories, April 2021: **0** factories, May 2021: **7** factories).

3.6 Factories requiring temporary evacuation

Factory buildings are required to (temporarily) evacuate, if the initial or follow-up inspections revealed a severe and imminent risk of structural failure or severe electrical and fire hazards.

From March 2021 to May 2021, three factories were temporarily and partially evacuated as inspections revealed a severe and imminent risk of structural failure.

4. REMEDIATION

The completion of safety remediation at **1,700** (approximately) factories are monitored through approximately **400** follow-up inspections each month, involving RSC engineers. Each factory is inspected approximately once in every four months.

4.1 Initial Findings Progress Rate

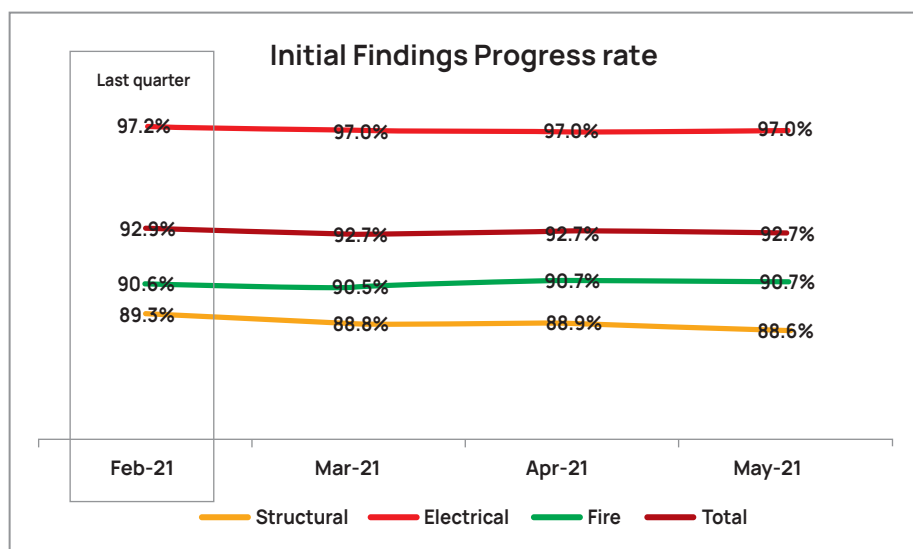


Figure 10: Initial Findings Progress rate from March 2021 to May 2021

From this figure, it is evident that in May 2021, the initial findings progress rate decreased from last quarter due to no inspections in April 2021 and first three weeks of May 2021, failure to submit required engineering documents in a timely manner and factories' non-cooperation in providing CAP update.

4.2 Designation

Factory Designations among **1,696** RSC covered factories:

- **CAP behind schedule:** The CAP is in implementation, but one or more timelines have not been met.
- **CAP on track:** The CAP is in implementation and all timelines have so far been met.
- **Initial CAP completed:** All issues identified in the Accord/RSC initial inspections have been verified as corrected by the RSC.
- **CAP Pending/CAP not finalised:** The CAP is either incomplete, absent, or not yet approved by the RSC.

CAP Designation	Mar-21	Apr-21	May-21
CAP behind schedule	1,055	1,036	1,027
CAP on track	177	205	220
Initial CAP completed	359	361	362
CAP not implemented	189	190	190
CAP Pending/CAP not finalised	81	83	80

Table 7: CAP status from March 2021 to May 2021

4. REMEDIATION

The vast majority of factories behind the schedule is a cause for concern to the RSC. It must be noted that a CAP is marked behind schedule, if just one item has passed the agreed final timeline. Being behind schedule therefore does not necessarily mean that no progress has been made at all. The RSC remains vigilant in accelerating the pace and level of remediation at the large number of covered factories where execution of the remediation is inadequate or too far behind schedule.

4.3 Number of Covered Factories in Progress Rate Categories

NB: only includes factories with a technically approved CAP

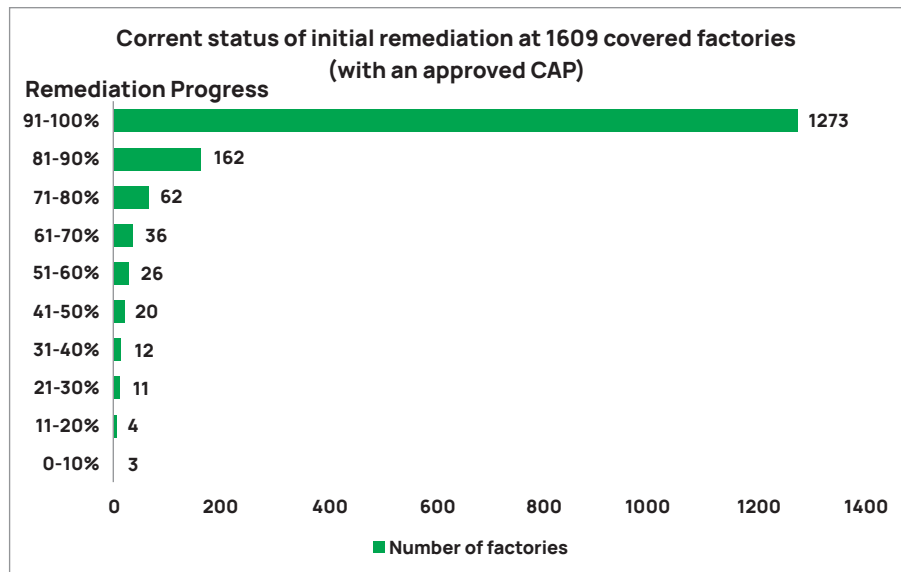


Figure 11: Status of initial remediation at covered factories as of May 2021 (with an approved CAP)

4.4 Remediation status of original/initial & new safety findings (in published CAPs)

- **In progress:** This is the default status for an inspection finding. It means that remediation of the inspection finding is underway.
- **Pending verification:** The RSC has been informed that the finding has been corrected but the RSC is yet to verify this.
- **Corrected:** The finding has been verified as corrected by the RSC engineers through their follow-up verification inspections.

The total findings in published CAPs include original findings and new findings:

- **Original/Initial findings/issues:** Findings from the RSC Initial inspections.
- **New findings/issues:** Findings from RSC follow-up inspections.

4. REMEDIATION

4.4.1 Initial Findings

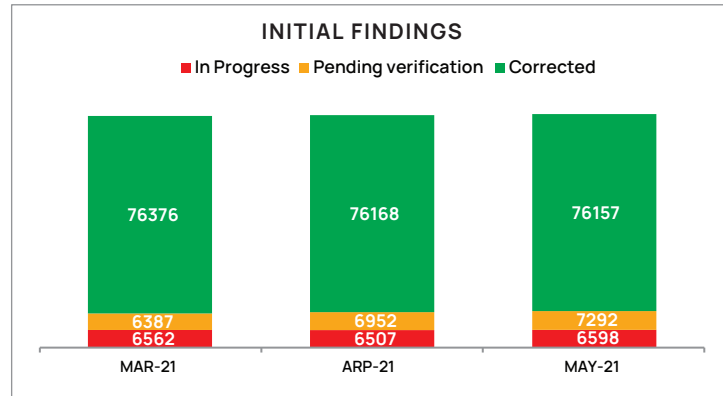


Figure 12: Initial issues/findings status as of May 2021

4.4.2 New Findings

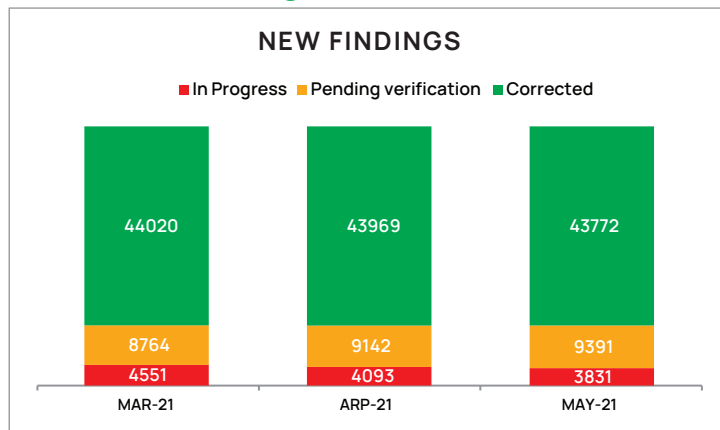


Figure 13: New issues/findings status as of May 2021

4.5 Scope wise total findings Corrected %

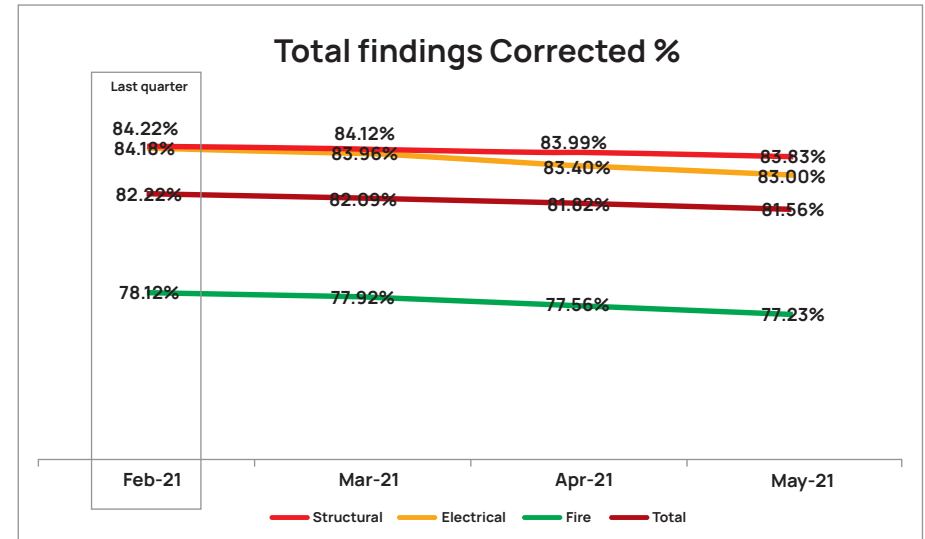


Figure 14: Scope wise total issues/findings corrected rate from March 2021 to May 2021

From this figure, it is evident that in May 2021, the total findings corrected rate decreased from last quarter due to no inspections in April 2021 and first three weeks of May 2021.

4. REMEDIATION

4.6 Progress and completion rates of common remediation items

Most of the findings that are reported in published CAPs are common to many factories. The RSC tracks the total number of findings⁸ by categories and subcategories. The structural, electrical and fire categorisation allows for further analysis of the most common safety hazards across all the factories inspected under the RSC prescribed Safety Programme.

4.6.1 Structural

Status of most common Structural findings at covered factories and Remediation Progress rate:

Factory update with the issue status

Findings	No. of factories where the finding was identified	No. of factories where the finding is still outstanding	Remediation Progress rate
Lack of management load plan	991	89	91.0%
Inconsistency with building plan and drawings	1076	151	86.0%
Incorrect implementation of existing load management plan	894	70	92.2%
Lack of design check against lateral load	750	115	84.7%

Table 8: Status of most common structural findings at covered factories up to 31 May 2021

4.6.2 Electrical

Status of most common Electrical findings at covered factories and Remediation Progress rate:

Factory update with the issue status

⁸The changes of the findings number in quarters vary on changes of the covered factory number, as-built design documents modifications, etc.

Findings	No. of factories where the finding was identified	No. of factories where the finding is still outstanding	Remediation Progress rate
Lack of cable support and protection	923	17	98.2%
Lack of Lightning Protection System (LPS)	879	53	94.0%
No Single Line Diagram (SLD)	872	173	80.2%
Inadequate circuit breakers	809	37	95.4%
Hazardous accumulation of dust and lint on electrical equipment	782	3	99.6%
Unsafe earthing equipment	736	4	99.5%

Table 9: Status of most common electrical findings at covered factories up to 31 May 2021

4.6.3 Fire

Status of most common Fire findings at covered factories and Remediation Progress rate:

Factory update with the issue status

Findings	No. of factories where the finding was identified	No. of factories where the finding is still outstanding	Remediation Progress rate
Lockable/collapsible gates	1,346	20	98.5%
Inadequate egress lighting	1,378	42	97.0%
Lack of fire separation in hazardous areas	1,291	108	91.6%
Non-compliant exit stair openings	1,373	190	86.2%
Storage in means of egress	1,247	32	97.5%

Table 10: Status of most common fire findings at covered factories up to 31 May 2021

5. FACTORY REMEDIATION FUND

To support factories that no longer have a brand signatory company as a customer to support them, a Factory Remediation Fund (FRF) was set up in 2017. In July 2019, the fund became available to all covered factories meeting certain criteria. The fund has been exhausted and is closed for new applications.

The funds made available through the FRF were distributed in several instalments, subject to factory cooperation, proof of payment towards remediation works and verified completion of the remediation commensurate with each preceding instalment. Inspections to verify remediation completion under the terms of the Accord Remediation Fund agreements are conducted by the RSC. Applications for FRF from 21 factories were approved⁹.

From 1 March 2021, 1 inspection was conducted up to 31 May 2021 to verify that the factory remediation was completed as per funds provided.

⁹<https://bangladeshaccord.org/updates/2020/08/20/overview-of-the-factory-remediation-fund-closed-on-31st-may-2020>

6. NON-COMPLIANT SUPPLIERS

Supplier factories failing to participate in the safety programme prescribed by the legally binding 2018 Transition Accord agreement between Global Brands and Unions, go through a notice and warning (Escalation) procedure under Article 16 of the 2018 Accord, and Article 24(q) of the RSC's Articles of Association.

The Escalation Protocol includes three steps to be followed prior to terminating business with a supplier due to inadequate participation in the RSC programme. The decision to escalate any issue is based on the assessment of information received by the RSC. The Chief Safety Officer (CSO) may escalate for other reasons as he may determine. If an active or inactive supplier does not comply with the remediation requirements set by the RSC's CSO, the RSC must notify the relevant responsible Participating Companies, who will address the non-compliances in a step-by-step manner (Stage 1, 2 and 3) using the RSC's Escalation Protocol. If a no-brand factory requires escalation to Stage 1, 2 or 3 for failure to cooperate with the RSC inspections programme, the RSC will send the Non-Compliance Letter (NCL) to the no-brand factory and will record the applicable stage of escalation in FFC. A factory may be issued multiple non-compliance letters (NCLs) for failure to meet various RSC requirements at different times. A factory will be removed from the escalation process (de-escalated) if they have addressed all the issues identified in the NCLs.

If the requirements are not met, the factory is escalated to stage 3 and signatory companies terminate their business relationship with this factory.

In accordance with the Memorandum of Understanding (MoU) signed between the Accord Steering Committee and the BGMEA on 8 May 2019, stage 3 of the Accord Escalation Protocol has been complemented by the withdrawal / suspension of the Utilization Declaration (UD) - which is mandatory to export apparel from Bangladesh, of non-compliant factories by the BGMEA/BKMEA. In the event that the non-compliant factory is part of an RMG group, should the UD of the non-compliant factory not be withdrawn by BGMEA/BKMEA within four weeks of escalation to Stage 3, Accord signatory companies will be required to terminate their business relationship with all factories under the same ownership with the non-compliant factory. Prior to the signing of the MoU, the Escalation Protocol applied to all RMG companies controlled by the same group owner and was not contingent on UD withdrawal / suspension (failure thereof) at the non-compliant factory.

The RSC continues to implement escalation procedures consisting of three stages as follows:

1. A notification of non-compliance (Escalation Stage 1)
2. A notice and warning letter (Escalation Stage 2)
3. Ineligibility for business relationship with Accord signatory companies (Escalation Stage 3)

Examples of factory non-compliance that trigger the implementation of the escalation procedure include but not limited to:

1. Refusal to temporarily evacuate the factory,
2. A lack of progress in finalising corrective action plans or executing required safety renovations,

6. NON-COMPLIANT SUPPLIERS

3. Refusal to resolve worker complaints on safety issues,
4. A lack of cooperation with RSC trainers, case handlers and engineers,
5. Submission of design documentation including FADS, SUPS, (D)EA, SLD etc.
6. Delay in completion of retrofitting work,
7. Inspection access denial,
8. Failure to comply with closure & relocation protocol.

Escalation status	up to 31 May 2021
De-escalated	313
Stage 1	297
Stage 2	113
Stage 3	180 ¹⁰

Table 11: Factory Escalation status up to 31 May 2021

The factories which are escalated to Stage 3 are made ineligible as they no longer are eligible for Accord signatory company's production for a minimum period of **18** months and until the conditions for re-qualification have been met. Total number of Ineligible factories is **190**. Among those, **180** factories were made ineligible for their own non-compliances, **10** factories were made ineligible due to belonging to the same RMG company group with the non-compliant factory before formation of RSC. The RSC is committed to enforcing the escalation procedures, in this respect Stage 3 escalation requires the confirmation by Industry of removal of Utilisation Declaration (UD's) in a timely manner.

Escalation Update	Mar-21	Apr-21	May-21
Total reviewed for Design Reviews (DR) and Escalation Assessment Form (EAF) of structural documents	148	54	69
Update on fire and electrical EAF review	138	21	10
Escalation recommended for not cooperating for developing an updated CAP	0	0	0
Recommended for Stage 1	25	8	2
Recommended for Stage 2	10	1	6
Recommended for Stage 3	2	0	0
Recommended for Additional stage	36	12	2
Pending De-escalation review case	1	4	1
Stage 1 issued	20	6	2
Continuation of Stage 1 Issued	2	0	0
Additional Stage 1 issued	15	7	1
Stage 2 issued	6	1	6
Additional Stage 2 issued	14	6	0
De-escalation issued	4	3	3
Number of Stage 2 meeting held	4	2	2
Stage 3 issued	2	0	0

Table 12: Factory Escalation update from March 2021 to May 2021

¹⁰Total number of Ineligible factories is **190**. Among those, **180** factories were made ineligible for their own non-compliances, **10** factories were made ineligible due to belonging to the same RMG company group with the non-compliant factory before formation of RSC.

7. SAFETY COMMITTEE & SAFETY TRAINING PROGRAMME 33

The roles of Safety Committees (SC) include:

- Conducting safety checks (walk-throughs) at the factory to identify safety hazards,
- Responding to employee complaints and suggestions about safety and health,
- Reviewing company accident reports to learn how such accidents can be prevented,
- Communicating about safety and health issues to the workers,
- Conduct meetings regularly, at least once every three months.

The Safety Committee and Safety Training (SCST) Programme consists of the following key components:

1. Initial Meeting with Factory Management and Signatories: The aim of this meeting is to introduce the Safety Training Programme and to agree on all the all-employee meetings' dates,

2. 8 Sessions Safety Committee Training Programme including the Safety Committee's role in remediation, complaints handling, joint problem solving, hazard identification and safety monitoring systems,

Status of Safety Training programme at covered factories up to 31 May 2021	Number of factories
Factories completed the training	1058
Covered factories are yet to commence the training	258 ¹¹
Factories where the training commenced but has been put on hold for various reasons ¹²	162 ¹³

Table 13: Status of Safety Training Programme at covered factories up to 31 May 2021

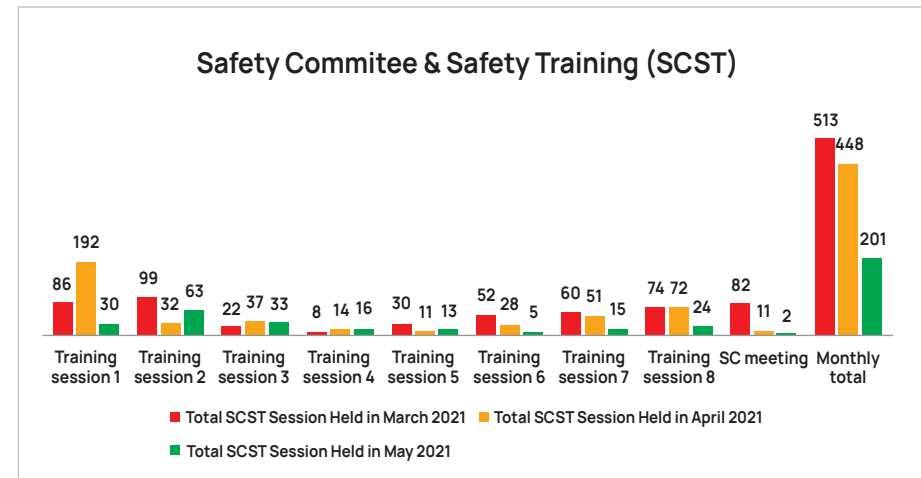


Figure 15: SCST update from 1 March 2021 to 31 May 2021

Remote Safety Committee Walk-Through (SCWT) conducted 272 sessions , Remote SCWT is now regularly included in the SCST schedules from February 2021.

¹¹ these includes EPZ factories

¹² Various reasons include factories undergoing the closure/relocation procedure, labour disputes, or ongoing legal proceedings.

¹³ Active, Inactive Responsible, Pending Closure factories are included.

¹⁴ Safety Committee Walk-Through (SCWT) session was on hold during COVID-19 pandemic.

7. SAFETY COMMITTEE & SAFETY TRAINING PROGRAMME 34

7.1 Different initiatives taken by the Training department (March 2021 – May 2021)

As the RSC formation took place during the global pandemic COVID- 19 period, RSC management paid special attention to ensure the health protection of the RSC employees as well as factory staff. The All-Employee meetings and Informational sessions for all factory workers and staff are still on hold for health and safety reasons during the pandemic. This shall be resumed once the onsite operation starts.

To ensure full-fledged work under the RSC SCST programme, the Training department's various activities under the SCST programme are conducted via online sessions as continuation of the initiatives taken in the last quarter.

To enhance and further supplement the capabilities of the SCST department in terms of their knowledge related to workplace safety, the team completed training on occupational safety and health. The team completed the general course on NEBOSH (National Examination Board on Occupational Safety and Health) for Training Staff in May 2021.

8. Occupational Safety & Health Complaints Mechanism 35

Workers at covered factories and their representatives can raise their concerns about safety and health risks safely and confidentially, through the Occupational Safety & Health Complaints Mechanism (OSHCM).

Starting 1 June 2020, the OSHCM is being operated by the RSC. Accord Signatory companies and Union Signatories are required to ensure that, through the RSC, the OSHCM continues to provide effective remedy to workers, independently and autonomously. This being a key part of the core objectives of the RSC as detailed in section 1.1 bullet point 8.

During the course of investigation, RSC complaint mechanism handlers determine remediation requirements in regard to safety and health. The RSC works with complainants and Factory Management to ensure that the requirements are fully and smoothly implemented. If the Factory Management does not comply, the RSC will implement a notice and warning process leading to termination of the business relationship if no progress is being made.

Workers in the RSC covered factories have the following rights:

- The right to refuse unsafe work;
- The right to participate in the work of their factory Safety Committee;
- The right to file a complaint when they see a safety problem in their factory;
- The right to protection against reprisal for reporting safety-related matters;
- The right to Freedom of Association in relation to protecting their own safety.

Status of OSH complaints up to May 2021	Number of OSH complaints
Total OSH complaints received by the Accord/RSC	1,527
Total OSH complaints in progress	160
Total OSH complaints resolved by the RSC	127
Total OSH complaints resolved by the RSC in the reporting period (Mar'21-May'21)	22

Table 14: OSH Complaints status up to 31 May 2021

Complaint Mechanism	Mar-21	Apr-21	May-21
No. New Complaints	148	110	69
No. New OSH Complaints	32	27	23
No. New Non-OSH Complaints	117	86	47
No. New Initial Inspections	1	0	1
No. New Verification Inspections	4	0	2
No. Pending Verification Inspections	1	3	2
No. Newly Closed Complaints	113	125	76

Table 15: Complaints Mechanism update of March 2021, April 2021 & May 2021

COVID-19 COMPLAINTS

8.1 COVID-19 complaints

From 1 June 2020 to 31 May 2021, workers at RSC-covered factories and their representatives have filed **149** complaints related to COVID-19 at the Occupational Safety & Health Complaints Mechanism. The allegations raised in these complaints concern the following:

COVID-19 related category	Number of complaints
Non-payment of separation from employment payments	75
Forced resignation	30
Termination of employment	27
Non-payment of maternity benefits	27
Non-payment of wages	27
Retrenchment	8
Lay-off	8
Under-payment of wages	3
Risks to health	0
Worker unrest	3
Threats	2

Table 16: COVID-19 related complaints from 1 June 2020 to 31 May 2021

The total number of unique COVID-19 complaints is lower than the total number of allegations because some of the complaints include more than one allegation.

RSC Quarterly Aggregate Report June 2021

On remediation progress and status of workplace programmes at RMG factories covered by the RMG Sustainability Council (RSC)

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