

# Annual Report

(2021 – 22)



RMG Sustainability Council

[www.rsc-bd.org](http://www.rsc-bd.org)



**Our aim is to maintain and create  
a safe and trustable RMG industry  
as the preferred production source  
for international fashion business  
promoting development and  
employment in matters of safety.**



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RMG  
SUSTAINABILITY  
COUNCIL

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Published by  
**RMG Sustainability Council (RSC)**

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# ACRONYMS AND ABBREVIATIONS

AEM	: All Employee Meetings
BGMEA	: Bangladesh Garment Manufacturers and Exporters Association
BKMEA	: Bangladesh Knitwear Manufacturers and Exporters Association
BSE	: Boiler Safety Engineering
CAP	: Corrective Action Plan
CMT	: Cut, Make & Trim
CMT	: Case Management Tool
CSO	: Chief Safety Officer
DEA	: Detailed Engineering Assessments
DIFE	: Department of Inspection for Factories and Establishments
EA	: Engineering Assessments
ESE	: Electrical Safety Engineering
FADS	: Fire Alarm and Detection System
FFC	: Fair Factories Clearinghouse
FLS	: Fire and Life Safety
FLSE	: Fire & Life Safety Engineering
LPS	: Lightning Protection System
NCL	: Non-Compliance Letters
NFPA	: National Fire Protection Association
OSHCM	: Occupational Safety & Health Complaints Mechanism
PPE	: Personal Protective Equipment
PRE-T&CVI	: PRE-Testing & Commissioning Verification Inspection
QC	: Quality Check
QAR	: Quarterly Aggregate Reports
RCH	: Remediation Case Handler
RMG	: Ready-Made Garments
RSC	: RMG Sustainability Council
SC	: Safety Committee
SCST	: Safety Committee and Safety Training
SCWT	: Safety Committee Walk Through
SLD	: Single Line Diagram
SSE	: Structural Safety Engineering
SUPS	: Fire Suppression System
T&CVIs	: Testing & Commissioning Verification Inspections
UD	: Utilisation Declarations





# Our **STORY**

## RMG Sustainability Council

In a bid to carry forward the significant accomplishments made on workplace safety in Bangladesh, the Ready made garments (RMG) manufacturers, global brands and retailers, global unions and their local affiliates established the RMG Sustainability Council (RSC) in 2020.

This tripartite initiative was founded to initially conduct the workplace safety programmes at the 1700+ RMG factories covered under by the RSC. We envisage to eventually cover all RMG exporting factories in the country. Our vision is that the RSC creates 'A world-class sustainable workplace safety programmes, enabling sustainable business and developing the supply chain', and to make the RMG industry a safe and better place to work for the millions of workers employed in this sector.

Since the day of our inception, we have been actively working across the country with the businesses (RMG factories), government, development agencies, and others to ensure that the workers in the factories have safe workplaces and have access to remedy to address safety concerns and exercise the right to safe workplaces through our complaints mechanism. Through delivering innovative training programmes with tailor-made awareness messages, we aim to ensure that the voice of the workers is heard to build a better future for our RMG sector.

With around 200 dedicated staff guided by 18 - member Board of Directors (BoD), we operate within the regulatory framework of Bangladesh. We are licensed by the Ministry of Commerce (MoC) and coordinate our work with the Ministry

of Labour and Employment (MoLE) and the various related ministerial departments through the Government Coordination Council (GCC).

We are continuing with factory inspections, remediation monitoring, safety training and an independent safety & health complaints mechanism available to workers.

We are progressing with our objectives to set up an environmental sustainability department, with a focus on Carbon and Water as pillars of our programme.

We aspire to also encompass industrial relations including business and human rights, skills development and environmental standards in the near future along with our safety inspections and trainings.





## Our **PROMISE**

Delivering World-class Sustainable Workplace Safety Programmes

### Our **VISION**

A world-class workplace safety programme, enabling sustainable business and developing the supply chain

### Our **AIM**

Maintain and create a safe and trustable RMG industry as the preferred production source for international fashion business promoting development and employment in matters of safety

## Our **MISSION**

Sustain and continuously develop a safe, humane and sustainable RMG industry through a tripartite approach, including industry, unions and brands, by jointly implementing a sectorial safety standard to minimise health perils and prevent avoidable accidents and empowering factory management and workers through training and capacity building

## Managing Director's MESSAGE

It is my pleasure to present the RSC's second Annual Report at a time when Bangladesh has experienced a swell in volume of orders received by the RMG sector. This is because of the growing reputation that Bangladeshi factories are safer now than ever before. The RSC has played an important role in the growth of the RMG sector. Bangladesh now plays a vital role in the RMG supply chain and, as a result, has significantly contributed to GDP by being one of the world's largest garment exporters, with the sector accounting for more than 80 percent of Bangladesh's total exports. Today, we stand proud to know that the Bangladeshi RMG sector has come on leaps and bounds in terms of establishing a better safety record and that she recently earned more than \$40 Bn.

Working together, the RSC and the factory teams have had a positive impact on the understanding of the Bangladesh's safety record and an impact on GDP and the further development of the country. We believe the significant efforts made in improving working conditions for the country's nearly two million garment workers, have played a pivotal role in this success. The ongoing accomplishments in delivering better workplace safety in Bangladesh that have taken place to date are peerless and second to none amongst competitor countries. Bangladesh now stands apart on the global stage for her RMG sector and workplace safety programmes.

This Annual Report covering the period June 2021 to



May 2022 documents the progress of the RSC. The RSC is now a fully established organisation with solid collaborations, strategic goals and a focused agenda to become a leader in delivering world-class sustainable workplace safety programmes. The RSC is a permanent safety monitoring body in the ready-made garment (RMG) sector of Bangladesh. It aims to help solidify Bangladesh's standing as a global leader in RMG exports. In addition, the RSC aspires to become a global leader in sustainable workplace safety and a single platform for all garment sector compliance needs. Furthermore, the RSC also envisages being the uniform platform through which Brands, Unions and Manufacturers jointly address safety for millions of workers who earn a living in Bangladesh's RMG sector.

The RSC, under its different programmes, conducts structural, electrical, fire & life safety and boiler safety inspections, supports and monitors remediation, conducts safety training and operates an independent occupational safety and health complaints mechanism available to workers in RMG factories. The RSC is fully committed to transparency and public accountability. We conduct initial, follow-up and verification inspections, report on the remediation of identified safety hazards at inspected factories, including by publishing initial inspection reports and remediation progress through up-to-date Corrective Action Plans (CAPs), which are available to signatories via the Fair Factories Clearinghouse (FFC). During the reporting period, RSC operations experienced partial halt several times (July and August 2021) due to COVID-19 related restrictions.

At the RSC we take a pragmatic, solutions-based approach, without compromise to safety and standards, to find solutions to outstanding issues. We started with project '*Grease the Wheels*' to find efficiencies in our operations. Then we looked at how to better support our team of engineers who in turn are able to work with factory engineers on a peer - peer level to collaborate to find acceptable solutions to meet the RSC's Standards. In this regard we published 22 Technical Guidance Notes, which are available on our website. We further supported our engineers with initiatives such as '*Project D*' – that looks at solving, mainly, fire related items, '*Project M*' – which works across all disciplines to achieve better design reviews and '*Project R*' – which looks at risks of open incomplete CAP items.

In the second year of the RSC the success of flagship programme '*ICU Deep Dive*' for the factories continued. It gives me great pleasure to recognise the milestone achievement in completing the initial findings – covering the life safety concerns. The programme experienced a success rate of 55% in May 2022 (which was 7% in the initial year of RSC). A huge part of the RSC's success is attributed to the '*ICU Deep Dive*'. What I learnt at the outset of my career in the RSC was the failure rate stood at some 80% in the final inspection. In my experience, from commercial project management, we always speak of eliminating our loss factors and converting each loss into a win. The '*ICU Deep Dive*' addresses better communication, offering clarity on solutions, and working together to achieve acceptance, thereby

converting each failure into a pass. The overall pass rate has risen from a mere 17% in May 2020 to now 28% (an increase of 64%).

I congratulate the RSC team who worked collaboratively on this achievement over several years. I know there were difficult times when it seemed that we may not achieve recognition. The Factory Owners, Management, Compliance and Technical Teams, the RSC Engineers, led by Heads of Departments, Remediation Case Handlers, and the Admin. Team who supported and enabled our operations to run smoothly, I thank you all.

At the time of the RSC coming into being on 1 June 2020, we had 275 Letter of Recognition (LoR). Now, 2 years into our journey, I am proud to say that for the reporting period we have 477 LoRs, a steady rise in successfully completing the initial findings, thus completing the initial life safety concerns. We are pleased to state that during the reporting period, RSC covered factories made substantial progress in spearheading their safety remediation. A total 90 factories were issued with LoRs from June 2021 to May 2022. Note, that we still have NEW findings to complete. With the dedication of the RSC staff, I am confident that in due course we will complete all findings soon and be able to move from Phase 1 – '*MAKE SAFE*' to Phase 2 – '*KEEP SAFE*'.

It is important to maintain the investment and to ensure good and proper performance of the newly installed equipment to ensure safe workplaces. A regime of regular monitoring and technical support and training will be provided by the RSC as part of the Phase 2 operation.

To monitor the remediation progress and verify that corrective actions had been completed correctly, the RSC conducted over 4,000 inspections at 1,720 RSC covered factories. What makes the RSC totally unique is the workplaces safety programmes of safety training and complaints, I am pleased to report that we have provided training sessions at 1,130 factories and resolved 293 complaints.

In this reporting year, the most promising approach of the team has been clearly understanding the *Arena and Ecosystems* dynamics of the RSC. At the beginning of the year, the teams started to map our Ecosystems by introducing a concept called Arena. The Arena and Ecosystems mapping helped us

identify the missing dots related to our operational capability for better-targeted results. It also helped us identify work streams on a broader level to finish the year strong and forward plan for the new year.

Furthermore, to ensure strict and fair inspection, prioritisation criteria are followed. The RSC introduced new inspection priority category with its "Fair for All" set of indicators to process each inspection request and provide an approximate inspection window. As there have been many factories in these categories, inspections are provided to those factories who are waiting the longest time and those with the most risk/safety concerns.

Dear readers, our prime purpose is to support the RMG industry in Bangladesh to become sustainable and we are on the pathway to achieve that. But we can't do it alone. To make the purpose a reality, we need to work with our allies and build relationships to amplify our voice. During the reporting period, we have made notable advances through meetings and dialogue with RSC stakeholders including local Trade Unions, MoLE, DIFE, ILO and Development Partners. Recognising this as an area of particular importance, the RSC is actively working on developing the Government Coordination Council.

After the tragic Sitakunda blast in June 2022, we were invited by Mr Salman F Rahman, *MP*, who advises the Prime Minister of Bangladesh, to discuss the possibility of collaborating with the Government on conducting safety inspections to the other industries in addition to RMG. We were invited by the Central Bank (Bangladesh Bank) to help support the Government on Green Financing for the RMG sector. I am proud to mention here that international development agencies, including Oxfam Great Britain, have approached us to partner with them on developing projects on Green RMG Factories.

We are confident that the work we have delivered over the past year and the consistency we maintain are crucial to building a sustainable culture of safety in Bangladesh's RMG sector. In the second year, we nurtured sustained engagement with both local and international stakeholders, developed long-term sustainable funding models and strengthened the RSC's operational capabilities. Looking to the future, high on our list of priorities in the year to come include developing proficiencies to include promotion

of better Industrial Relations (IR), continuous Skills Development, establishing a dedicated Environmental Sustainability department with a focus on Water and Carbon, and other Climate Positive initiatives.

Combining our long-term aspirations and our sustainability agenda, we are optimistic about the years to come and the opportunities for the RSC to strive to turn Bangladesh into a destination characterised by a world-class workplace safety programme that shall be also be considered as one of the preferred climate-neutral production sources for international fashion businesses. Overall, we have been successful in laying the foundations for such a bright future and I am optimistic that, together, we will drive forward the plan we have established.

I would like to extend heartfelt thanks to my team who worked, at times, under very difficult circumstances, in the middle of COVID-19. It most certainly wasn't always easy, especially given the need to write the many technical guidance notes and maintain operational functions. It is a source of a great deal of pleasure that the team acted positively and quickly, adapting to new initiatives and working diligently to meet the goals in a dedicated and spirited manner. I thank them all for making it happen.

In the following pages, I am pleased to share you with additional information on our focus, our programmes, activities and accomplishments of the RSC's hardworking staff in the different departments, who have made such a strong contribution to the RSC's progress in its second year.

Thank you



Iqbal M Hussain





## RSC AT A GLANCE

Total number of factories **1720**

Total number of safety committee training **1130**

Total number of inspections **4271**

Complaints resolved **172**

Letter of recognition **90**

## OUR RESPONSE TO COVID-19 CRISIS

The global COVID-19 pandemic changed everything. It created massive disruptions to business as usual. However, since the earliest days of the COVID-19 outbreak in the country, our teams adapted rapidly, working remotely and physically to battle the biggest health, social, educational, and economic crisis the generations have ever seen. We prioritised our inspections, remediation and workplace safety programmes. And the result speaks volumes.

In line with our overall COVID-19 strategies, we have undertaken several preparedness and improvised interventions to minimise transmission of the Coronavirus and to mitigate the impact on our overall operations. During the COVID-19 pandemic, we allowed for wide-scale working-from-home arrangements for staff so that we can continue our operations. During the reporting period, we had to suspend our factory visits for the month of July 2021. We continued our activities online. Thanks to the commitment of our dedicated team, we have embraced a milestone achievement of completing 4,271 inspections and remediation.

Since the beginning of the COVID-19 outbreak, we urged all our covered factories to prioritise their workers' safety and provided with a COVID-19 Health and Safety (H&S) checklist. It is worth mentioning that all our engineers/officials were oriented around COVID-19 H&S measures and provided with necessary safety equipment (PPEs) to mitigate the risks of disease transmission during the Safety Inspections. We also prioritised the list of the factories following the '*Fair for All*' inspection criteria and conducted factory inspections efficiently.

As part of the staff wellbeing, we prioritised staff health and safety. We are proud to say that all our staff received their second doses of the COVID-19 vaccine during the reporting period.



# OUR REPORTING AND TRANSPARENCY

The RSC has commitments to and requirements for accountability and transparency. Current factory related information, inspection and remediation data and data pertaining to the workplace safety programmes are a vital part of achieving those commitments. The RSC and the International Accord (IA) have been working together with the Fair Factories Clearinghouse (FFC) in New York to securely manage data and to publish relevant information through the Accord and the RSC websites, respectively, in line with the commitment to transparency.

Through our technical reports and other information architecture, we are consistently demonstrating and meeting our obligations. As part of the RSC's commitment to transparency and accountability, we publish Quarterly Aggregate Reports (QAR), Progress Reports on a monthly basis and Annual Reports on our website ([www.rsc-bd.org](http://www.rsc-bd.org)).

In the last reporting year, we have published the following contents:

Title	Number
QAR	3
Annual Report	1
Minutes of Meetings (Board of Directors)	5
Technical Documents	26
Training Materials	6

Table 1: RSC Publications during the reporting year

However, our endeavour towards demonstrating and meeting our obligations does not stop here. To date (as of 31 May 2022) our website got 324,930 views. We have received queries from 120 number of visitors, including media interview requests.

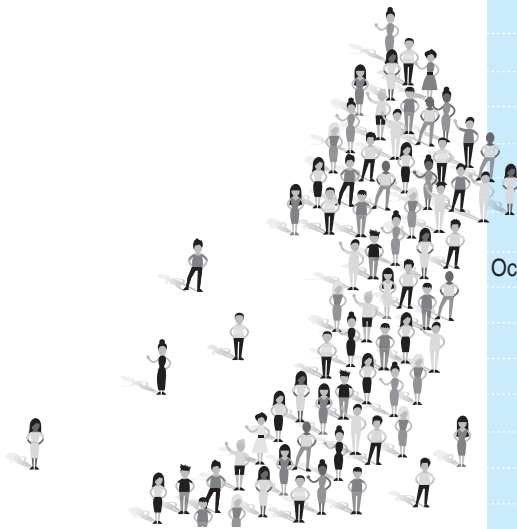
Our team is now working for improved searchability which would help our users to enjoy better experience while surfing with the following features:

- Filters to narrow the search by type of documents (QARs, Updates, Minutes, etc.);
- Expandable and collapsible table structure with improved data visualisation;
- Jump-to links for different contents;
- Improved presentation with dynamic contents.

# OUR PEOPLE



The RSC is a family of a diverse group of experts and specialists. Our team closely works with stakeholders across all areas of the RMG industry, government and sourcing brands to promote and ensure workplace safety in Bangladesh. Currently, the team of 199 is providing compelling and evidence-based advice to the factories on remediation through a number of tailor-made approaches.



Department /Function Name	Male	Female	Total
Leadership Team	2	0	2
HR & Admin Team	6	5	11
Finance & Accounts	4	1	5
Media & Communication	2	1	3
Data Management Specialist	0	1	1
IT	3	0	3
Trainers	18	18	36
Safety Training Program Assistant (STPA)	8	0	8
Occupational Safety and Health Complaints Mechanism	3	7	10
Remediation Case Handlers (RCH)	23	9	32
Technical Operation Manager	1	0	1
Boiler Safety Engineers	8	0	8
Electrical Safety Engineers	15	3	18
Fire & Life Safety Engineers	22	4	26
Structural Safety Engineers	22	2	24
Coordination Team (Structural team)	1	0	1
Support Staff	8	2	10
<b>RSC's Total Staff</b>	<b>146</b>	<b>53</b>	<b>199</b>

Table 2: Number of RSC staff

As a growing national entity with a vision to becoming the *Centre of Excellence*, the RSC maintained a strong commitment to individual and organisational eminence. In the reporting year, we invested in our people with a focus on developing new and efficient ways of working. We partnered with world-class institutes and seasoned individual trainers to build the capacity of our staff. In a bid to upskill our human resources, we provided 9,337 man-hours training to our staff. More than 100 staff got the opportunity to build their capacities through those trainings. And this has paid off – our training department has developed modules by themselves to provide training to the trainers.

Our commitment to inclusion and diversity reflects the importance we place on our people and on creating a workplace culture in which every employee is valued and respected for their contribution. To foster diversity in the workplace, we are promoting the gender balance.

# 1. Inspections and Remediation Programme

The last few years have been a turbulent time for the entire world. People across the world experienced the Coronavirus pandemic together. Even though the world became fearful of what the future holds for us, our teams adapted rapidly to battle the crisis. By May 2022, many the safety issues (>2,500 issues) identified at covered factories had been fixed (>1,000 issues), with the initial remediation progress rate across all factories reaching 91.42%. Out of the total 1,720 covered factories a total of 447 factories have now completed remediation of all initial inspections findings. This represents an increase of 85 factories between June'21-May'22. The overall rate of initial remediation progress made by factories slowed

down considerably from last year from 92.67%<sup>1</sup> to 91.42% because of:

- The number of factories increased from 1,600 to 1,700. So, new factories having new initial findings and "In progress" CAP status ultimately are decreasing the overall initial progress rate.
- A higher number of inspections were conducted in 2022 that caused "Pending Verification" items to revert back to "In progress" as their remediations were not completed in line with the standards. This ultimately reduced the overall initial progress rate.
- Factories becoming out of scope (e.g. archived, closed, ineligible) and the progress made by those factories have not been taken into account.

However, several covered factories are approaching to reach >90% initial remediation progress rate, and ultimately achieving Letter of Recognition (LoR). In the reporting year a total of 90 factories received LORs. Despite the RSC's new initiatives such as *ICU Deep Dive* and other best efforts to support factories in completing the remediation, possible life threatening hazards in factories remain in progress, including the installation and testing and commissioning of fire detection and suppression systems, and the completion of structural remediation. During the RSC period, 15 factory buildings were required to fully or partially evacuate because RSC's initial or follow-up inspections identified severe and imminent risk of structural failure or severe electrical and fire hazards.

## 1.1 Inspection

The RSC was able to utilise its inspection programme in its second year, following the Inspection Priority Category Table, with more capacity after the COVID-19 pandemic challenges in the first year, conducting >4,000 inspections.

Inspection Priority Category Table	
1	Inspections related to Industrial Accidents and Safety Concerns
2A	Potential 100% Initial CAP completed: 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
2B	(Potential 100% CAP completed factories) 100% Initial verified & completed; all new findings are in Pending 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)V and Document status is Accepted
5	Initial inspections
6	Structural priority factories: waiting for DEA verification, waiting for retrofitting verification, structural evacuation cases, or Structural items P
7	Other special inspections: FRF, OSH complaints/verification
8	Factories in linked buildings, compounds, or extensions to other priority factories
9	(Follow - Up Inspection) Factories that are waiting for RSC inspection for more than 365 days (RSC period) from their last inspection
10	(Business order issue) Factories that have been reported to the RSC as brands are not placing business orders due to the unavailability of a recent RSC inspection

Table 3: Inspection Priority Category Table from September 2021

<sup>1</sup> As of 31 May 2021, the number of RSC-covered factories was 1,696. At that time, the initial remediation progress rate was 92.67%

## ICU Deep Dive – an innovative approach towards improvements and efficiency

The RSC in its constant endeavour towards excellence has been engaging innovative approaches to improve its efficacy. Our team embraced an innovative approach called “*ICU Deep Dive (IDD)*” in 2020 to investigate and understand any potential for improvement that will help factories to achieve 100% initial CAP completion. As innovation requires collaboration, our team linked up with the factories and developed a Theory-of-Change and workplan utilising the “*Plan-Do-Check-Act*” methodology. Thanks to this innovative approach, 68 factories have achieved 100% initial CAP completion from September 2020 to May 2022. In the current reporting year, a total of 43 factories have been able to reach the target.

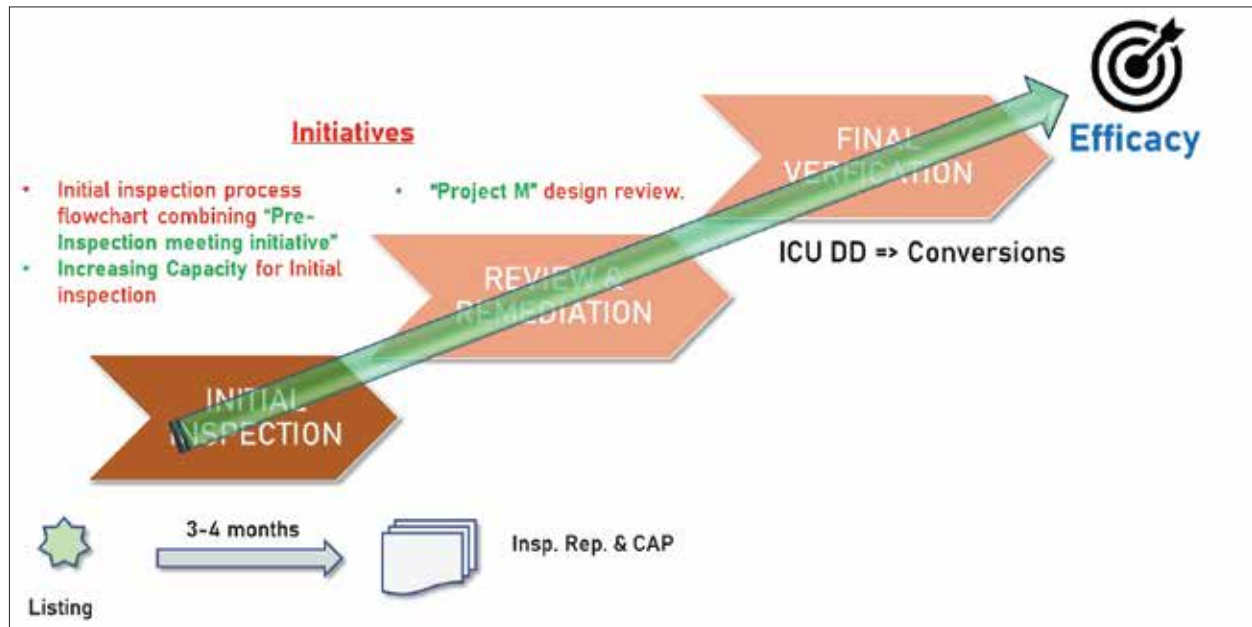


Figure 1: ICU Deep Dive Conversions

From listing to completion of initial CAP items, the RSC has taken different initiatives to reduce the time to manage risks in the RMG industry which in turn has increased the efficiency over time.

The initiatives includes the introduction of a Pre-inspection meeting initiative that has helped factories become ready in terms of documentation before the initial inspection. This has also reduced the on-site time loss for the engineers allowing them to complete inspections thus increasing the monthly initial inspection capacity to process the newly listed factories quicker. The design review efficiency has also been increased through “*Project M*” by reducing multiple design submissions before getting acceptance.

The Category 2A inspection combined with *ICU Deep Dive* and all the initiatives is supporting the upstream operations and all these operations collectively heading to “Efficacy”.

*ICU Deep Dive* is just the tip of the iceberg that we are calling Phase 1, which is “*MAKE SAFE*”. After the recognition the factory management is still left with new findings where we still have to cover a lot of ground and maintenance work so that the initial findings do not get repeated as a new finding, which is Phase 2 “*KEEP SAFE*”.

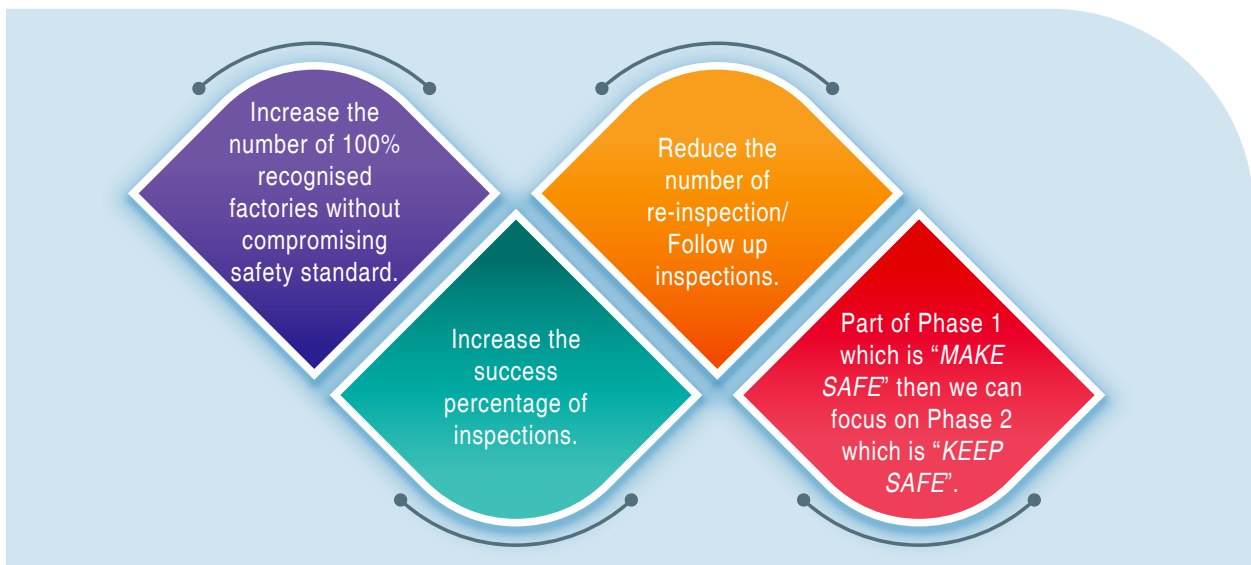
## Process followed while choosing factories for the ICU Deep Dive Programme

When a factory has all its initial CAP items of Structural, Electrical & Fire in either Corrected or Pending Verification status then that factory is considered eligible for the Category 2A inspection. A category 2A inspection is considered as a possible case of recognition. Category 2A inspection may include follow-up, full testing & commissioning verification inspection, final testing & commissioning verification, and structural remediation completed & ready for retrofitting verification. After the inspection if the factory fails to demonstrate the remediation as per standard, then the initial CAP progress status is changed from “Pending Verification” to “In Progress” and thus the factory becomes eligible for ICU Deep Dive programme.

### This programme includes:

- Notification to the stakeholders.
- Active, solution-driven, action-oriented & concise action plan for the outstanding CAP items.
- Technical guidance by the inspecting engineering team if required.
- Inspection based on priority categories after the RSC on remediation completion.

### Objectives:



The success of this programme depends on the appropriate communication and technical guidance provided by the RSC and the initiatives taken by the factory management and their consultants.

Overview of ICU Deep Dive	September 2020 to May 2022
Total number of factories covered in ICU Deep Dive	292
Number of factories where Deep Dive notification* sent 1st time	209
Number of factories where Deep Dive notification* sent 2nd time	64
Number of factories where Deep Dive notification* sent 3rd time	17
Number of factories where Deep Dive notification* sent 4th time	2
Number of factories received Letter of Recognition after Deep Dive	68
ICU Deep Dive Success Rate	55%

**Table 4: Overview of ICU Deep Dive**

\* The ICU Deep Dive programme includes a notification to factory management that were unable to become eligible for recognition letter. The notification acknowledges the near completion of the initial items by the factory management & the RSC also provides the specific action plans to be followed for the outstanding CAP items. In that notification the RSC also encourages factories to raise queries on the technical difficulty the factory is facing while performing the remediation. Lower the number of repetitive notifications indicating that more factories are following the provided action plans and becoming eligible for recognition letters after they demonstrate the remediation in the onsite inspection.

### Improvement through ICU Deep Dive Programme

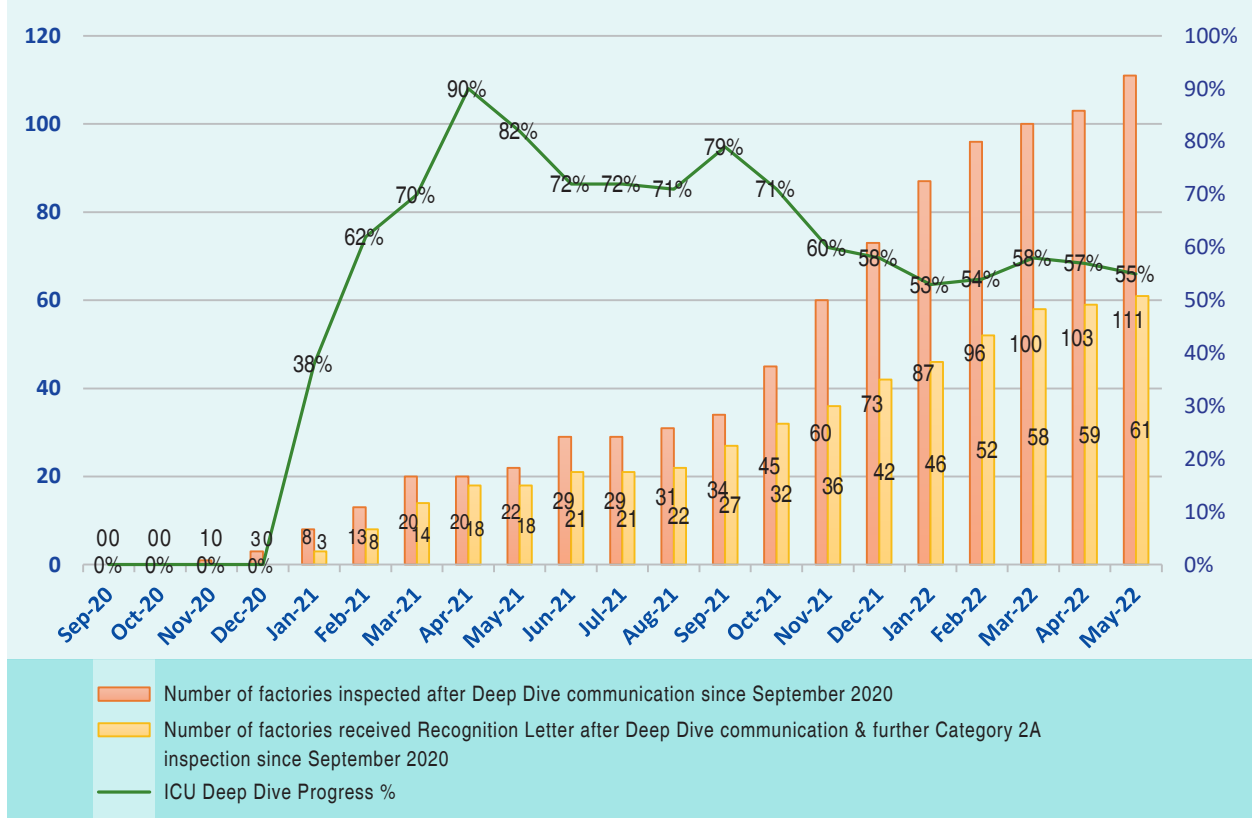


Figure 2: Improvement through ICU Deep Dive programme during RSC period up to May 2022

### Highlights:

- **Escalation:** A total of 646 factories are in different escalation stages (Stage 1, 2 and 3) which was 590 last year.
- **ICU Deep Dive:** The cumulative progress of *ICU Deep Dive* is 55% which was 82% last year
- **Closure-Relocation:** During this reporting period a total of 46 factories marked as closed in database which was 26 last year
- **Post incident:** A total of 67 post incident site were visited and recommended necessary remediation which was 22 last year.
- **Technical queries (TQ) to CSO:** During this reporting period a total of 9 TQ's were resolved; last year we resolved 26 TQ's.

## 1.2 Remediation

Bangladesh being one of the ‘fastest’ growing developing nations earned huge economic growth by investing in the RMG sector. Thanks to the highly skilled workers and business-friendly policies of the Government, Bangladesh has achieved the position of the top fashion producing country. The sector holds almost 14% of the GDP of Bangladesh as well as 81% of the total export earnings. To become the world-class garment manufacturing country, the sector has been constantly trying to work on creating safer workplace for the workers. To comply with international standards, the RMG sector in Bangladesh is investing in remediation as it helps to ensure a safer workplace for the workers, thus gaining more trust of buyers.

The RSC plays a vital role – a catalyst – in driving remediation progress, by providing industry with

engineering solutions and guidelines to correct safety issues. To do that, we monitor the remediation progress made through follow-up inspections.

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

Initial Findings Progress Rate (%)	May-21	May-22
Electrical	97.04%	96.54%
Fire	90.66%	88.84%
Structural	88.60%	87.39%
Total	92.67%	91.42%

Table 5: Initial Remediation Progress Rate

### Factory designations among 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.

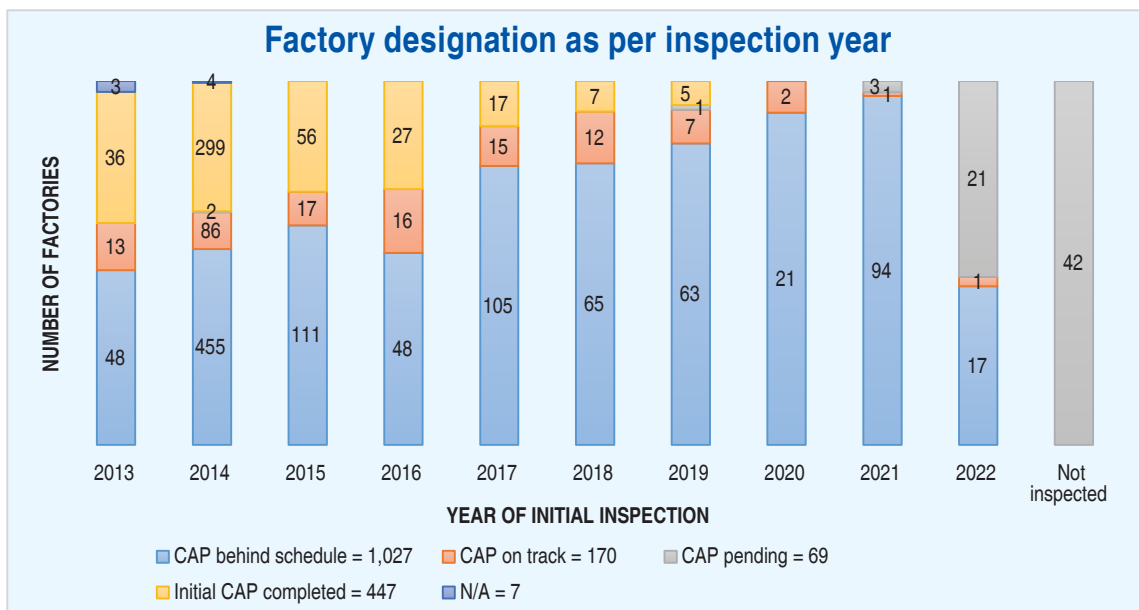


Figure 3: Factory designation as per inspection year



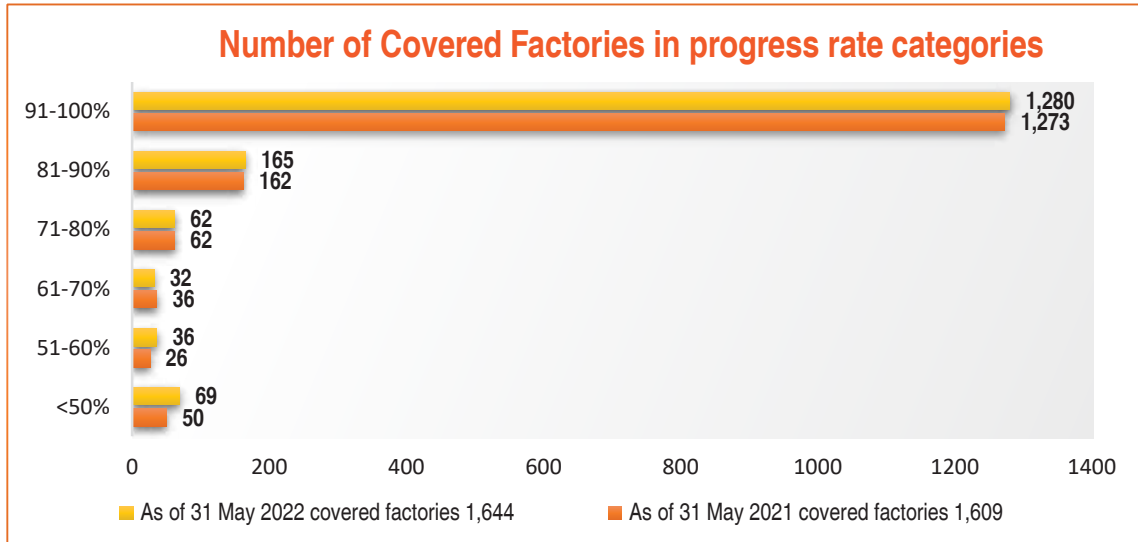


Figure 4: Status of initial remediation at covered factories as of May 2021 and May 2022

### Remediation progress of Safety findings

From the presented charts it may give the impression that the progress is relatively static but that is not the case:

- As of May 2022, there are a total of 13,006 "in progress" safety findings (Structural, Electrical and Fire) and most of these findings are big items (related to structural retrofitting, FADS, SUPS and SLD implementation) and associated with significant investment which is the reason of delayed remediation. These are the items that the RSC is prioritizing and under different initiatives accelerating the remediation.
- The number of covered factories of RSC is also dynamic. New factories are continuously being inspected and many covered factories are becoming out of scope which is ultimately affecting the number of safety findings thus impacting the overall remediation progress.
- As of May 2022, there are a total of 121,266 "Corrected" safety findings (including Structural, Electrical and Fire) whereas on May 2021 it was 119,929. So, 1,337 additional safety findings were verified as corrected in this assessment year which contributed to 1.10% progress.

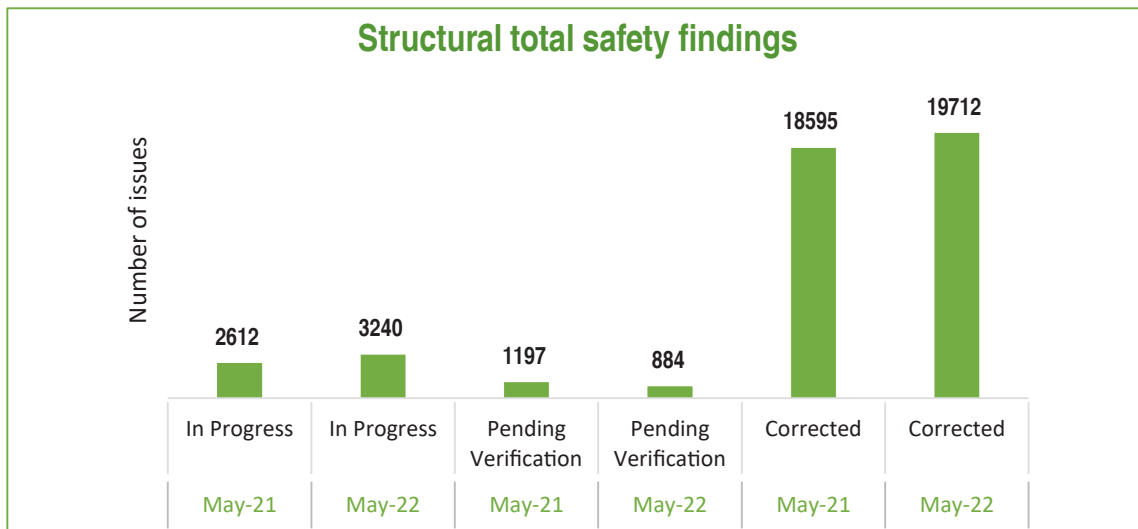


Figure 5: Structural total safety findings by year

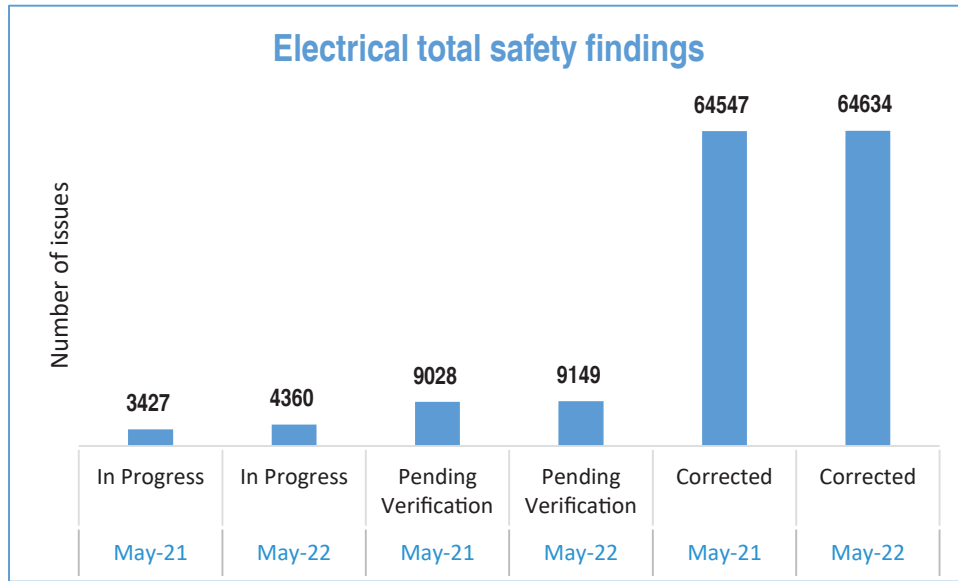


Figure 6: Electrical total safety findings by year

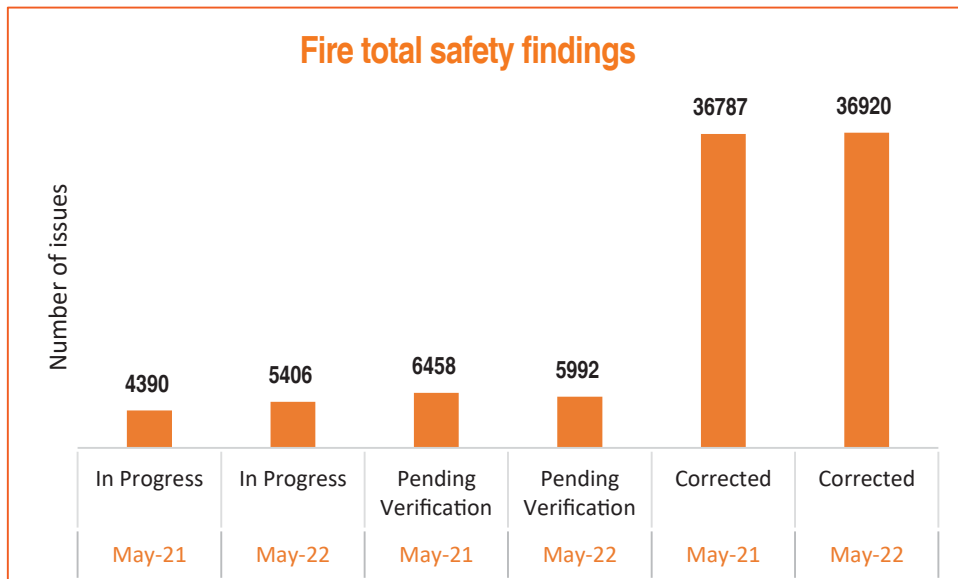


Figure 7: Fire total safety findings

### 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, 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.

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 *Utilisation Declaration* (UD) - which is mandatory to export apparel from Bangladesh, of non-compliant factories. 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, International 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 International Accord signatory companies (Escalation Stage 3).

Examples of factory non-compliance that trigger the implementation of the escalation procedure include but are 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.
3. Refusal to resolve worker complaints on safety issues.
4. A lack of cooperation with RSC trainers, case handlers and engineers.
5. Failure to submit and/or repetitive inaccurate 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 and relocation protocol.

Escalation status	As of 31 May 2022
De-escalated	376
Stage 1	270
Stage 2	170
Stage 3	206

Table 6: Factory Escalation status upto 31 May 2022

### 1.3 Structural Safety Engineering (SSE)

The RSC Structural Safety Engineering (SSE) Department boasts a team of 27 engineers providing solution-driven guidance to factories to allow them to make sound progress on remediation. Like other departments of the RSC, our SSE team conducts inspection, reviews designs and supports and monitors remediation. The team motivated by the art and science of planning and designing helps the industry to make their buildings secure and structurally sound to prioritise the safety of all who use it.

During the reporting period (from June 2021 to May 2022) our SSE team has carried out 123 Initial Inspections, 573 Follow-up inspections, 364 Verification inspections, including documents and retrofitting verification, and 31 other types of inspections. The rate of completing the inspection report within 14 calendar days has been 96%.

From the early days of the RSC, the team has been advocating for efficient engineering with an aim to enable the factories to apply sustainable solutions to address safety concerns. With its effort to expedite the remediation process to champion the safety from end-to-end, we have taken a number of initiatives including, but not limited to, “*Project M*”, Critical Findings Register, (D)EA Backlog and On-time Reporting.

#### Expediting the Design Review Process:

An initiative called “*Project M*” was launched in March 2021 to accelerate the acceptance of design review of design documents (D)EA. From March 2021 to May 2022, a total of 193 factory design documents (D)EA were accepted in three submissions, 19 factory design document accepted in four submissions, 4 factory design document accepted in five submissions. 7 factories are still unable to get acceptance even after 3 times submissions of their design review documents. Through the initiative, the acceptance rate of submitted documents is 86% (3 submissions).



During the RSC period, the SSE team identified 15 factories with “critical findings” where temporary (full or partial) building evacuation were required due to pertinent structural safety concerns. The SSE team prioritised those 15 factories and started monitoring their remediation progress. Along with other regular inspections and follow-ups, the SSE closely worked with factory management in reviewing their designs and remediation plan. To expediate the process of remediation, the team initiated a rigorous follow-up mechanism that led to the on-time completion of the remediation. Through our constant follow-up and advocacy, 9 factories have remedied the identified safety issues and resumed operations in their temporarily evacuated area, 4 factories' remediation work is still in progress, one factory has been relocated and one factory has been terminated and handed over to the Department of Inspection for Factories and Establishments (DIFE) as they did not take the temporary measures that we recommended.

(D)EA Status	As of 31 May 2022
Factories conducting a (D)EA is required	1,649
Pending submission by factory	138
Pending review	36
Accepted, pending on-site verification	24
Fully accepted i.e., on-site verification revealed alignment between (D)EA documentation and the physical building(s)	1,305
Partly accepted, partly pending submission by factory/review	145
Factories yet to complete the structural remediation based on an Engineering Assessment	344
(D)EA documentations were accepted through on-site verification	79.1%

Table 7: Overall (D)EA status up to 31 May 2022



## 1.4 Electrical Safety Engineering (ESE)

Ensuring a safe working space for the RMG workforce greatly depends on timely mitigation of electrical hazards as in many cases a failure from the electrical system can initiate a fire that can even result in structural collapse. Considering the impact of the electrical risks and hazards, we are implementing the programme on electrical hazard identification and remediation, which is one of the RSC's longest running endeavours.

Being a multifaceted programme, the scope of the programme covers on-site inspections, technical document review and technical consultation to the factory stakeholders. Broadly, all the projects under this programme aim to remediate unsafe electrical conditions at factories. In doing so, RSC electrical engineers and staff members of the team are contributing to speed up remediation process. The major attainments are described in the sub-sections.

### Electrical Safety Inspection Programme:

In the reporting year (June 2021 – May 2022), our team has conducted 1,924 inspections at the factories. In the previous year the number of inspections was 1,482. The numerical difference in the below table demonstrates the progress.

Inspection number		
Year	June 2020- May 21	June 2021- May 22
Number of inspections conducted	741	962
Number of initial inspection conducted	64	117
Number of follow-up inspection conducted	648	818
Number of other post-fire/post-accident / closure verification/ OSH complaint inspection conducted	29	27

**Table 8: Inspections conducted in 2 years of the RSC**

**Technical Document Review** – A robust electrical remediation programme requires a technical document such as electrical single line diagram (SLD), lightning protection system drawing and substation/generator/utility room layout. The RSC facilitates review of SLDs that helps factory to identify potentially hazardous systems including oversized protective switchgear, inadequate earth continuity conductor, etc. Currently, a dedicated project entitled “*Project M*” is being implemented that provides factories specialised consultation sessions so that technical person from factories can obtain a clear understanding of the system design and associated risks. At the initial stage, the project was about reviewing electrical single line diagrams (SLD) and shortlisting major hazards associated with the electrical system design. Additionally, we are arranging customised technical discussion sessions for the factory engineers and third party service providers who are mainly technical consultants. Through active participation in the programme, factories are now able to better understand the problems related to electrical system design concisely along with customised remediation procedures developed by experienced engineering team members. Thus “*Project M*” supports factories to prepare and submit quality SLDs.

Our analysis finds that the project has been able to significantly improve the accomplishment rate, as the table below explains.

Single Line Diagram dealt in Project-M since July 2021		
Total number of factory submitted SLD covered in project-M	Total meeting conducted in project-M	Total SLD accepted in project-M
229	736 (Average 3+ meetings for each factory)	205 out of 205 released SLD

**Table 9: “Project M” SLD review**

Our electrical hazard identification and risk mitigation is based on real-time data collection. We collect data on the existing hazards through field inspectors in the presence of factory personnel. It enables factory personnel to learn about the nature of the hazards along with a practical root cause analysis in which factory stakeholder has direct involvement. Consequently, the process contributes greatly to adopting the remedial measures by the factory within the minimum amount of time as they receive on-site consultation on risk and hazard mitigation action plan.

The RSC electrical team has achieved the highest corrective action plan (CAP) completion rate for initial items as of 87.2% despite having many constraints. The professional inspection and remediation program for identifying the safety issues and subsequent corrective actions executed by the RSC expert team members to attain overall 82% progress rate which is the highest among the other departments.

In a bid to support the knowledge generation and dissemination, our electric safety team developed and published an electrical installation guideline and sample SLD guidelines. The resources are available on our website <http://www.rsc-bd.org>. The team provides free technical consultation on remediation action and preparation of the technical documentation alongside its core functions.



## 1.5 Fire & Life Safety Engineering

Our Fire & Life Safety (FLS) department plays an indispensable role in the workplace safety of garment industries in Bangladesh. The Fire & Life Safety (FLS) 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. FLS Department conducts the initial inspection, follow-up inspection, pre-T&C inspection, T&C inspection, final verification inspection, closure/relocation inspection, post-fire incident inspection, critical findings inspection, FRF inspection, special escalation inspection, etc., and provides individual reports of all these inspections. The department reviews documents of the initial design, Pre-T&C design, T&C design, negative suction pump design, fire separation design, means of egress arrangement design, etc. The department attends frequent technical meetings with factory management and consultants to support/guide technical difficulties.

- Technical guidance (TG) for ensuring passive fire protection of steel structures has been developed for the benefit of industries and engineering professionals.
- The RSC has developed design guidance for unprotected steel structures of certain height and stories considering the life safety of occupants.
- Considering technical difficulties and at the same time ensuring the safety requirement and Standard; the RSC has developed implementation guidance on overcoming negative suction conditions for fire protection systems. This allows the industries to achieve the remediation in a cost effective way and in a lesser time frame.
- Compressed gas cylinders are life-threatening and at the same time an essential requirement for some factories. Focusing on the life safety of occupants and assisting industries with the smooth operation; gas cylinder safety and precautionary guidance are developed by the RSC and are in effect.
- 12 Technical supplementary papers related to “Technical Sub-committee discussions and pending tasks” have been developed and are under implementation by the RSC.
- 9 Technical remediation guidance including the requirement of aspiration - air sampling tube, location of lift landing door have been developed and are under implementation.
- The team has developed the standard process to address industries technical queries with practical solutions without compromise to safety and standards.



### Factories requiring Fire Design and Drawings

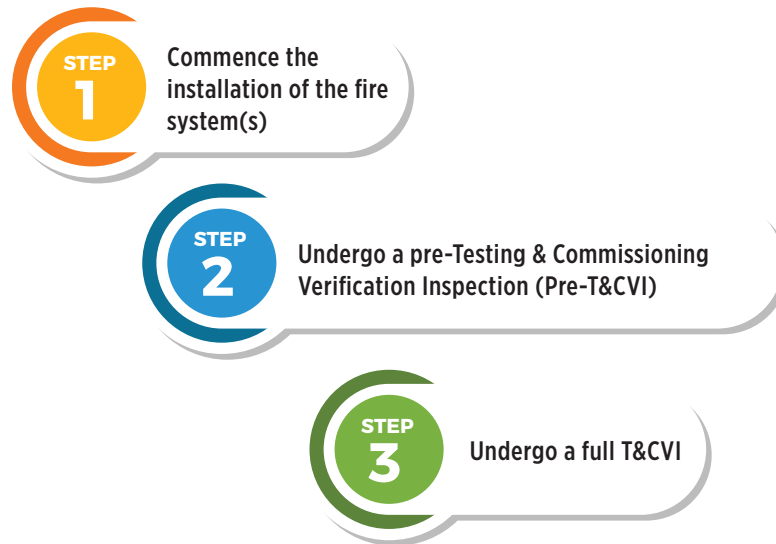
The Fire & Life Safety inspections at the factories may result in the requirement of the factory to install a fire alarm & detection system and a fire suppression system. The design drawings for these systems must be submitted for review and acceptance prior to installation of the system to ensure they meet the required standard.

FADS/SUPS design documents status as of 31 May 2022	FADS	SUPS
Factories where FADS is required	1,646	1,349
Pending Submission	83	79
Pending Review	42	40
Accepted	1,521	1,230
% Of Acceptance in total	92.4%	91.2%

Table 10: Overall status of FADS & SUPS design documents up to 31 May 2022

### Status of Installation of Fire Detection and Suppression Systems

Once the fire system’s design is accepted, covered factories are required to follow the steps described below:



FADS/SUPS installation status	FADS	SUPS
Factories where the fire system has been verified as adequately installed to standard and fully functional	401	263
Factories pending a Final Verification Inspection	68	32
Factories pending Testing & Commissioning Verification Inspection (T&CVI)	156	131
Factories at the stage of pre-T&CVI on-site documentation & equipment review	328	249
Factories where the installation of the system is ongoing	642	582
Factories where the installation is yet to commence	55	64

Table 11: FADS & SUPS installation status up to 31 May 2022

## 1.6 Boiler Safety Engineering

The RSC Boiler Safety Engineering (BSE) Department was launched in December 2020 as an integral part of the RSC's inspection programmes. The key focus of the RSC Boiler Safety Department is to mitigate boiler safety hazards at the covered RMG factories to ensure a safe workplace. As an interim activity, we have been conducting external visual inspections to identify and remediate potential hazards that can be identified through visual inspections.

As a Kickstarter, we first formed a team and prepared the Standard Operating Procedure (SOP). We then concentrated on developing Technical Guidelines, Training Needs Assessment Report, procuring equipment. Finally, the team conducted a survey and prioritised inspection schedules. Currently the team is run by 8 engineers.

Our SOP is based on the Accord and other national and international best practices. Our Technical Guideline has been shared with Chief Inspector of Boilers (CIoB). We have not been asked to make any changes as of now.

One of the challenges that we faced over the last one year was with procurement of equipment due to the COVID-19 pandemic and lack of availability in the local market. However, we are expecting to complete the procurement process by the end of this year (2022).

In order to build the capacity of the team, a number of trainings and orientations were organised during the period from March 2021 to November 2021. The training programmes were designed and organised in collaboration with Modern Erection Ltd (MEL), a local boiler manufacturing company) and TÜV-SÜD (a German based firm). The team is expected to receive several months' training this year (2022).



In order to schedule a boiler safety inspection for a factory, prioritisation is necessary. To do so, we updated the Accord's previous questionnaire and sent to factories who did not respond to the previous survey. The data through the online questionnaire survey were then combined and analysed applying a risk-based approach.

**Definitions: (C= Category)**

- C1: 15 years old or more boilers*
- C2: Boilers with capacity 5000kg/hr. or more*
- C3: Locally made boiler*
- C4: Boiler without registration*
- C5: No water treatment available*

**Prioritisation Category: (P= Priority)**

- P1: C1 including any/all C2 to C5*
- P2: C2 including any/all C3 to C5*
- P3: C3 including any/all C4 to C5*
- P4: C4 including C5*
- P5: C5 only*

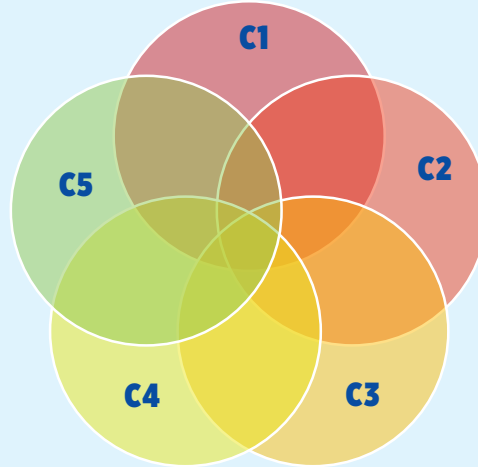


Figure 8: The “Risk-based” approach

Based on the Accord's pilot programme findings, we divided boilers into 5 categories according to associated risks. For example, the old boilers are listed as Category 1, boilers with larger capacity are listed as Category 2. So, the deliverables from the risk-based approach is a list of factories with prioritisation categories. The P1 is determined in a way where P1 and any/all the other categories (P2 to P5) are present thus posing the highest risk and it follows for rest of the Prioritisation Categories.

The activities of collecting boiler data through online survey and analysis of collected data were also done in the lockdowns and work-from-home period to make the best use of time.

Based on the risk assessment, we identified factories that needed immediate inspections. During the reporting year (June 2021 to May 2022), we conducted external visual inspections for boilers at 727 factories. Through external visual inspections, we could identify substantial number of possible discrepancies and guided factories to mitigate those discrepancies. Since the inception, one of our goals has been raising awareness on boiler safety among the factory management.

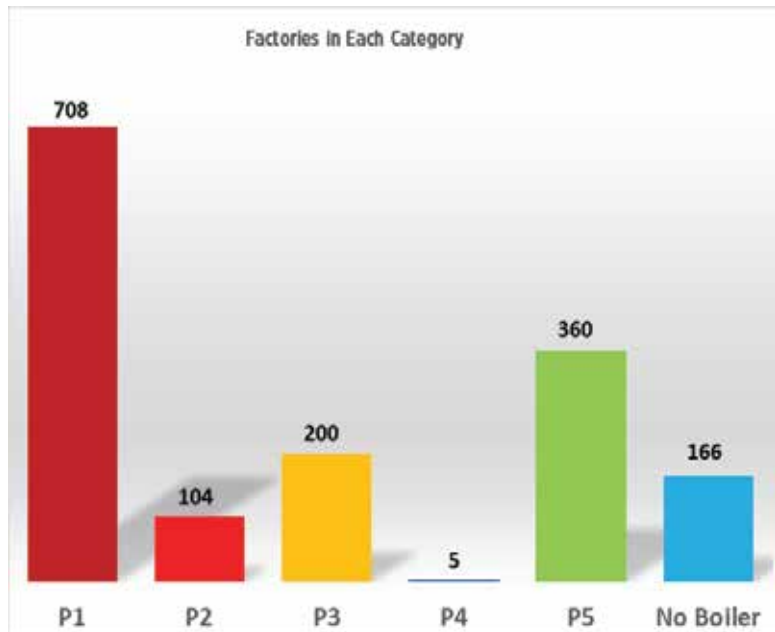


Figure 9: Deliverables of the risk-based approach



## 2. WORKPLACE PROGRAMMES

### 2.1 Safety Committee and Safety Training (SCST) Programme

The key focus of the RSC SCST programme is to train the Safety Committee members and raise awareness of the employees of the RMG factories to ensure safe workplaces. The Safety Committees (SCs) receive safety training programme, learn about occupational safety and health (OSH), and play a vital role at the factories to identify potential hazards.

Our SCST programme consists of the following components:

1. Initial Meeting with Factory Management and Signatories (Brand)
2. 8 Safety Committee Training Programme sessions
3. Safety Committee Walk Throughs (SCWTs)
4. All Employee Meetings (AEMs)
5. Ongoing Support



The Safety Committee trainings resumed field activities since December 2021 after the COVID-19 pandemic hit Bangladesh. We also conducted sessions via video conference during the pandemic.

Through the SCST programme, the RSC has been able to train 116 Safety Committee members<sup>3</sup> at the factories who are now well trained about OSH potential hazards and how to address these. They understand the concept of health and safety and its importance in the workplace. From June 2021 to May 2022, a total of 5,048 SCST sessions were conducted. 341 out of total 685 Letters of Acknowledgment (LoA)<sup>4</sup> were issued by the RSC in its second year. During the reporting period, a total of 67,816 workers attended sessions and received safety and health informational booklets through “All Employee Meetings (AEMs)” on workplace safety and safe evacuation. The RSC training elements on Health Hazards and the Right to Freedom of Association in relation to health and safety – the 8th Safety Committee training session and the 3rd All Employee Meeting – have been implemented at covered factories. During the reporting period, 2,770 number of Safety Committee and Walk Through (SCWT) sessions were conducted.

Our Safety Committee Walk Through (SCWT) Reports have been a significant record of ‘on-hand’ training for the Safety Committees.

We conducted a Safety Committee survey to identify the new/not trained Safety Committee members and the necessity of ‘*Resumption Training Session*’ at the factories where we have new SCs.

### 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.

<sup>3</sup> Safety Committee members are representatives from factory management and workers.

<sup>4</sup> LoA is issued to Safety Committee members once they have complete the RSC safety training programme.



Figure 10: SCST Progress in 2 years of the RSC

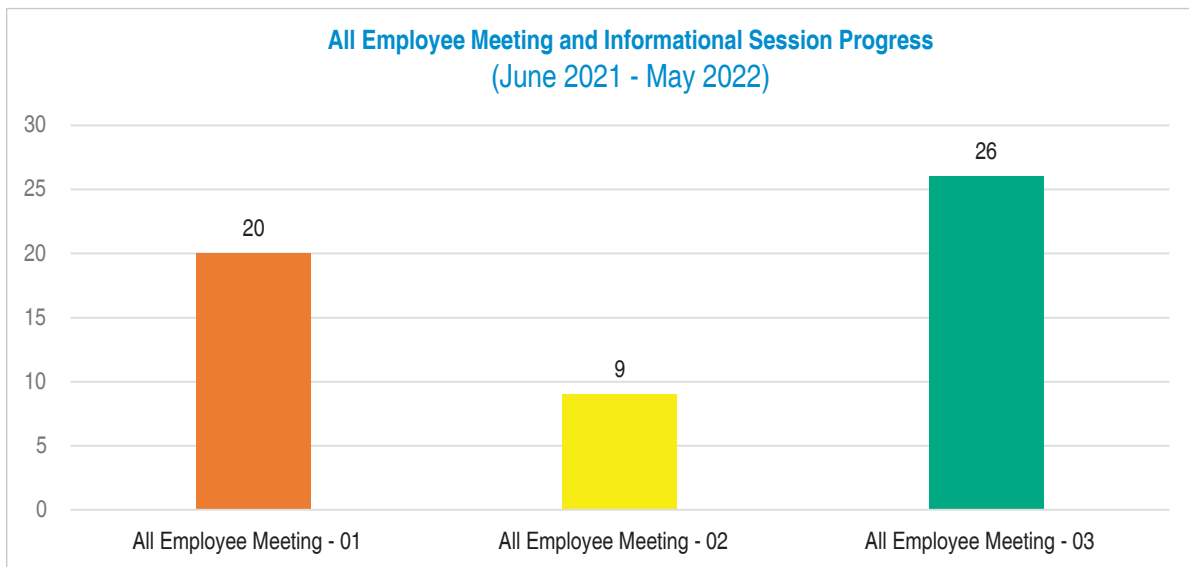


Figure 11: All Employee Meetings & Informational session update





## 2.2 Occupational Safety and Health Complaint

### Mechanism

The RSC maintains an Occupational Safety and Health Complaint Mechanism (OSHCM) so that workers at RSC covered factories can raise occupational safety and health problems arising at their workplace.

The RSC inherited the operation of OSHCM in June 2020. Brand Signatory companies and Union Signatories of the International Accord are required to ensure that through the RSC, the OSHCM continues to provide effective remedy to workers, independently and autonomously as part of our core objectives.

Occupational, safety and health complaints are processed by our team of specialists who investigate and resolve the complaints and ensure that remediation requirements are fully and smoothly implemented. Where complaints affect the safety and health of all workers/groups of workers, the RSC makes an announcement to all workers on the findings and remedy of the complaint.

If the factory management does not comply with remediation requirements, the RSC issues a notice and initiates the warning process leading to the termination of the business relationship if no progress is being made.

The major achievement of the RSC's Safety Complaint Mechanism has been resolving a total of 293 OSH complaints in the 2 years since the commencement of the RSC:

- **Year 1: 121 OSH complaints resolved**
- **Year 2: 172 OSH complaints resolved**

We feel proud whenever we resolve a complaint - whether the complaint concerns an individual worker or a group of workers.

For the RSC period, a total of 2,378 complaints were filed through OSHCM, reaching a total of 4,657 since 2014. For the RSC period, of the total number of complaints received, 630 (approximately 26%) concerned allegations related to occupational safety and health (OSH) and, therefore, fell within the RSC's scope. The RSC did not process the remaining 1,774 complaints because they were non-OSH. These were forwarded to factory management, responsible brands and labour signatories.

### Success Story

**“God sent you to my aid. I will never forget what you have done for me. If it weren't for you, I would have died without treatment.”**

Aleya (pseudonym) has been working for a factory in (Gazipur) for 14 years.

Aleya developed a severe spinal cord injury, which she alleged was caused by long hours of sitting at her workstation. She filed a complaint against the factory management through RSC's OSH Complaints Mechanism.

Aleya's injury was so acute that she could barely walk. The doctor informed her that she could become paralysed if she did not undergo emergency medical procedures. But the treatment was expensive, and it was not possible for Aleya to cover the cost of the procedure. Aleya requested the factory management to cover the cost of her required surgical procedure.

Upon receipt of the allegation, the RSC immediately informed the factory management, signatory brands and unions. The factory management did not accept that the worker was suffering from a workplace injury but immediately agreed to cover the costs of surgical procedure for Aleya. They also granted her 8-month's paid leave.

At the end of 8 months, Aleya was still not fit for work, thus resigned from her employment. Factory management accepted her resignation and paid all her due entitlements.

*\*(Name of the worker and factory have been changed)*



### Main types of OSH complaints received (630)

- Engineering (structural/fire/electrical safety): **31**
- Working environment related (incl. COVID-19 related, unsafe drinking water supply, excessive heat, workplace violence, forced overtime, denial of maternity pay/leave rights, denial of sick leave, physical and sexual harassment): **590**
- Reprisal for having filed a complaint: **13**

While we have successfully provided access to remedy to workers in RSC-covered factories, we have faced several challenges. The main challenge has been the increase in the number of complaints. To address this challenge, we have doubled the size of the Complaints Team (5-10). The other impeding challenge has been the restriction on going to the factories to conduct complaint investigations during the work-from-home period.

#### OSHCM plays a vital role in helping workers to exercise the rights provided under the RSC:

- 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.

PROVIDING ACCESS TO REMEDY	
ALLEGATIONS	REMEDY
Blocked aisles/ egresses	Clear aisles/ egresses
Excessive heat	Installation of ceiling fans
Inadequate maintenance of washrooms	Safety Committee report Improved maintenance of the toilets
Workplace violence	Disciplinary action including dismissal Compensation for the worker Training for mid - level and senior managers RSC announcement to all workers
Denial of maternity entitlements	Provision of maternity leave Payment of maternity benefits Reinstatement
Denial of sick leave	Payment of sick pay Payment of termination benefits Reinstatement
Non-participation of trade unions in factory Safety Committee	Trade unions nominate workers' representatives on the factory Safety Committee

Table 12: Providing access to remedy



# Annual report

(2021 – 22)

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