



STANDARD **O**PERATING **P**ROCEDURE



**Occupational Safety and
Health Complaint
Mechanism Unit**

RMG Sustainability Council

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Revision #	03	Approved By	MD- Abdul Haque
Prepared By	OSHCM Unit, RSC	Approval Date	18-Jan-2024
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1. Purpose

This Standard Operating Procedure (SOP) describes how the received complaints will be handled. It explains the summary view of the RSC OSHCM procedure and an authoritative guide to clarify the understanding to all RSC stakeholders which will be equally applicable for all.

This SOP defines how the complaints are received, processed, and remediated by the RSC to ensure sustainable working environment of the RMG Industry in Bangladesh.

2. Scope

This SOP applies to complaints received from individual employees/workers or their choosing representatives (Person/Organization) - relating to RSC covered/listed factories confidentially, with the RSC in the following categories:

Occupational Safety and Health related issues: Occupational Safety and Health (OSH) includes elements such as denial of fire, electrical, structural or boiler safety related issues, personal protective equipment, maternity & sick leave, excessive working hours, forced overtime, sexual harassment and workplace violence, workplace accident/injury and disease, health & hygiene. OSH includes pay which relates to occupational safety and health, such as sick pay, maternity pay and payments of any nature which may have been impacted because of reprisal actions against those who have pursued a claim under safety and health but does not include general payments, such as overtime pay, wage levels, Eid bonuses, etc.

COVID 19 issues: By Steering Committee agreement (28 April 2020), the OSHCM treats complaints related to the economic impact of the COVID-19 health crisis on employees/workers as OSH (e.g., non-payment of wages or retrenchment without payment of dues. COVID -19 period: March 2020 to April 2021.

Reprisal issues: Workers who utilize the Safety and Health Complaints Mechanism cannot face any form of retaliation or reprisal for submitting a complaint to the RSC.

Non-OSH issues: Other issues which are not included in the above-mentioned criteria will be considered as Non-OSH complaints. Following the - RSC protocol complaints mechanism unit forwarded those complaints to the concern Factory, signatory brands/companies in a business relationship with that factory or concern industry associations and labor signatories and if the complainant so requests, he/she is provided with the helpline number of the Government's Department of Inspection for Factories and Establishments (DIFE).

Complaints received from RSC Not Covered factory and No Brand factory, are forwarded to DIFE through sharing DIFE helpline number (**16357**) with the complainants. If there is any safety-related emergency issue raised in any factory i.e., accident/incident related issues, safety related issues, child labour etc. in that case the RSC directly informs DIFE through e-mail.

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3. Procedure

The operation of the RSC Complaints Mechanism on Safety and Health is an inquisitorial process which practices a restorative justice approach and is collaborative in the implementation of corrective action.

3.1 Receiving of Complaints:

The RSC OSHCM department has a dedicated mobile phone number & email to receive complaint-

- RSC Complaint Hotline Number: [01769-969000](tel:01769-969000)
- RSC Complaint Email Account: complaints@rsc-bd.org

The complaint Hotline number is available from Sunday to Thursday (except government holidays) from 8.00 am to 6.00 pm. The RSC OSHCM also receives complaints through postal mail or website. The RSC OSHCM can proceed with any complaint which is acknowledged through the electronic & printed media or other sources.

3.2 Nature of OSH Complaints:

The RSC OSHCM determines the nature of complaints based on the primary information received from the complainants, and accordingly records the complaints in the complaint database. Occupational Safety and Health (OSH) is a multidisciplinary field concerned with the safety, health, and welfare of employees/workers at work. To ensure a sustainable working environment and under the scope of RSC mandate the OSHCM consider especially the following issues as Occupational Safety and Health (OSH)-

- **Fire, Electrical, Structural and Boiler** related safety denial issues or fail to maintain/implement adequate safety measures.¹
- **Sick leave** request denial or separation from job due to sickness.²
- **Maternity** leave, benefit, and welfare related rights violation.³
- **Forced overtime/ excessive work**-related rules violation.⁴
- **Health and Hygiene:** Fail/deny maintaining adequate standards according to relevant rules and regulations (Excessive dust/ noise/ heat/ light/ artificial humidification/waste weight/ ventilation/ cleanliness/ overcrowding).⁵
- **Workplace Violence:** Victimization through Workplace violence or inadequate measures to maintain a violence free workplace. Any kind of threat, intimidation, beating, slapping will be considered as workplace violence.⁶
- **Harassment:** Victimization through any forms of harassment or inadequate measures to maintain harassment free workplace.
- **Workplace accident/injury or disease:** Inadequate measures to prevent workplace accident/injury or disease or deny ensuring adequate treatment/compensation as per provision of law.⁷
- **Welfare and others safety:** PPE, day care, medical center, canteen, grievance box, fire drill, tiffin, first aid, drinking water, washing facilities, i.e., Along with the complaints raising by Safety Committee members related to employees/workers safety and health.⁸

¹ Memorandum of Association of RMS Sustainability Council, Section 2

² Section 116 of BLA 2006, C130 of ILO

³ Section 45-50 of BLA 2006; Section 37-39 of BLR 2015; Section 3.6.2 of the National Profile on OSH, C183 & R191 of ILO

⁴ Section 100, 102, 109 of BLA 2006; C029 of ILO

⁵ Section 51 to 60- chapter v of BLA 2006; R120 of ILO

⁶ C190 & R206 of ILO

⁷ Chapter vii and schedule I, II, III, IV and V of the BLA 2006; Section 3.5.1 and 3.5.2 of the National Profile on OSH; C155, C161, C170 and R194 of ILO

⁸ Articles 23, 24, 25, 26 and 27 of the International Accord & International Accord Protocol Pack 2021

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3.3 Initial/ Preliminary/ Off-site Assessment:

Assigned Complaint Specialist contacts the complainant to receive additional information on the submitted complaint and to collect necessary evidence. Such assessments are mostly done by phone calls, messaging app (IMO), WhatsApp, text messages and e-mails.

3.4 On-site Assessment/ Factory Investigation:

Factory investigation or on-site assessment planned in pursuant of the submitted OSH complaint to gather further evidence/ documents/ information. Such factory investigation will be conducted by Complaint Specialist/ Technical Expert without any prior notification/information to the factory. This is the independent and sole authority to take a decision by the Head of the RSC OSHCM based on sensitivity of the complaint. The assigned Complaint Specialist/ Technical Expert must be provided with access and unencumbered ability to conduct the investigation at the factory and other activities related to the submitted complaint.

Such unannounced investigation at factory includes an opening meeting, followed by facility tour/site visit, detailed documents check and closing meeting.

In case of further requirement, the RSC OSHCM may decide for verification investigation to cross examine or review remedy status. If the issue has been remediated, the RSC shall close the complaint with the closing communication. If the verification investigation finds that the factory did not remediate the issue of allegation properly, based on remediation status, the RSC may permit additional timeline for remediation, or may proceed with the notice and warning provisions of the RSC Article 24(q). If the factory management refutes the allegation based on the first investigation findings, the Complaint Specialist/ Technical Expert may proceed for further factory investigation, to gather more evidence/documents/information to ground the allegation (if required).

3.5 Communication/Notification:

The RSC OSHCM department communicates in several sets of emails related to the complaints related to OSH, NON-OSH, or both.

3.5.1. OSH Communication:

For OSH complaints, the email notifications sent accordingly after factory investigations/on-site assessment have been done by the assigned Complaint Specialist/ Technical Expert at the factory. Such communication to the related factory, responsible brands or BGMEA/BKMEA (independent factories) and relevant labour union colleagues includes-

- Initial Notification
- Reminder/ Meeting/ Follow-up communication.
- Closing/ Resolution/ Final status related communication.

This communication includes general allegations & requested remedy of the complainant, findings of the unannounced investigation along with RSC resolution within a specific timeline, which also expects response/feedback from factory on the allegation and RSC requested resolution. Any communication related to Escalation is processed by dedicated and authorized Remediation Program Department (RPD) at RSC.

3.5.2. NON-OSH Communication:

For NON-OSH complaints, a single notification e-mail is sent informing the related factory, responsible brands or BGMEA/BKMEA (independent factories) and relevant labour union colleagues. This communication includes scope clarification that the RSC OSHCM department will not process the complaint, provides the general allegations, proposed remedy of the complainant(s). The RSC OSHCM wants to ensure that the parties have received the correspondence and understood its contents.

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3.6 Feedback/Reply:

If the RSC requested resolution accepted remedy is confirmed by the factory management, the Complaint Specialist will verify the resolution to reach the closing of the complaint. If the RSC requested resolution is refuted by the factory management, then the Complaint Specialist/ Technical Expert will go for further Investigation or Hearing meeting to move ahead with Resolution or Determination.

3.7 Resolution Meeting:

The OSHCM department shall facilitate a hearing meeting between the parties in the presence of relevant Factory Management, Complainant and/or appointed representative, and other witnesses if presented by any of these parties relevant to the complaint, based on the initial and/or further investigation if the factory refuses the notified allegation.

If any one of the parties fails to attend the hearing meeting, the RSC OSHCM department may conduct an ex-parte hearing meeting. If both the parties fail to attend the hearing, the OSHCM shall issue a determination based on the initial and further investigation.

In case of further query on such complaints, the RSC OSHCM Complaint Specialist/ Technical Expert may ask the parties to submit the evidence within the given timeline.

3.7.1 Facilitate Resolution:

The Head of the OSHCM may facilitate resolution upon mutual agreement of both parties. But if the parties fail to negotiate or facilitate a resolution among themselves, the OSHCM shall go for final determination.

3.8 Determination:

The RSC OSHCM has the authority to render a binding decision/ resolution on the complaint that sets out the required remediation/ remedy. And such a determination will be a binding decision for all parties.

3.9 Escalation Protocol:

The RSC OSHCM may initiate the escalation protocol if the factory has failed to cooperate during the whole process (investigation, assess, communication, meeting, determination) or failed to implement the remedy with the OSH complaint unit.

The Stages for such an escalation procedure will be followed as per the Standard Operating Procedure for the RMG Sustainability Council (RSC) Escalation Protocol. The escalation protocol includes three stages to be followed prior to terminating business with a supplier due to inadequate participation in the RSC program [Article 24(q) RSC Articles of Association]

“Article 24(q): “The RSC BoD shall require that RSC covered factories participate fully in the inspection, remediation, health and safety training activities. If a supplier fails to do so, the CSO will promptly implement a notice and warning process in accordance with the escalation protocol leading to termination of the business relationship by participating brands and retailers and withholding the Utilization Declarations (UDs) by the BGMEA/BKMEA.”

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3.9.1 Determination of Non-Cooperation

The facts or scenarios aforesaid below shall especially be considered as “non-cooperation” with the OSHCM:

- **Limited/ Denied Access:** To limit or restrict the investigators’ access to certain areas of factory premises, documents, or personnel.
- **Refusal** to Participate in the Investigation Process or to provide documents/ withholding necessary information.
- **False comments or statements**
- **Misdirection, Falsification or Misleading Information.**
- **Questioning and forcing to disclose confidential matters.** Asking or forcing the Complaint Specialist/ Technical Expert to answer, disclose or provide any information and data which is defined as confidential.
- **Lack of transparency,** not providing the investigators with the complete, accurate, or necessary information required for an investigation.
- **Delaying response or ignoring communication.** Delays the investigation process or declines to engage in meetings, ignoring or not responding to emails, phone calls, or requests for information or creates obstacles that prevents the Complaint Specialist/ Technical Expert to perform their tasks effectively. In that case if the RSC OSHCM doesn’t get a response from parties in any communication within a defined timeline, then the RSC OSHCM will give a maximum of 2 reminders (1 weeks’ timeline) for a response. If finally, the RSC OSHCM doesn’t receive any communication then the complaint unit will propose for escalation on non-cooperation ground.
- **Defamation:** Making statements intended to humiliate investigators, such as saying, 'We are paying your salary' or 'You are engaged in unauthorized activities,' etc. will be considered as non-cooperation.

3.9.2 Failed to Implement Remedy

The term “failed to implement remedy” means-

- A factory failed to implement the remedy based on RSC resolution within a defined timeline.
- A factory has made no reasonable progress or failed to implement a binding determination.
- A factory did not submit any remediation plan or any evidence which proved the corrective action after maximum 2 requests through email and phone call by RSC OSHCM.
- If the factory statement regarding remedy completion/partial completion is found to be incorrect during the verification process.

3.9.3 De-escalation Process:

A factory will be excluded from the escalation process (de-escalated) if the factory successfully completes the remediation upon verification by the RSC Complaints Specialist/ Technical Expert. If no other escalation issues have been recommended in the interim period factory will be eligible for de-escalation.

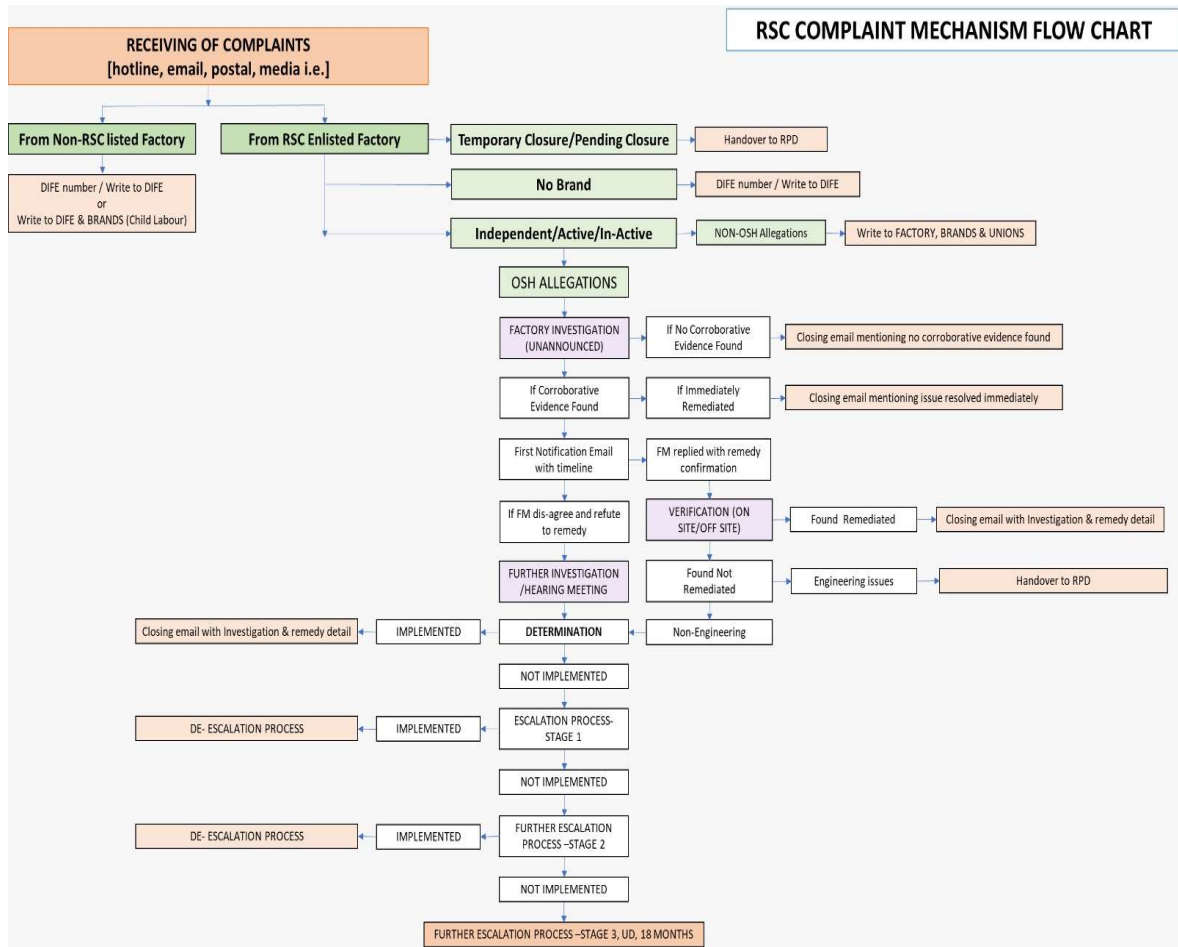
3.10 Closing Complaints

After completing the entire processing of the complaint is determined as closed. For such closing a notification communication also made to the related factory, responsible brands or BGMEA/BKMEA (independent factories) and relevant labour union colleagues. The RSC OSHCM may reach such closing through getting corroborative evidence, mutual negotiation, hearing process, remedy confirmation. Also CAP related issues could be closed by handing over to the RPD team after verification through the technical department. Also closing may be done based on the escalation procedure.

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3.11 RSC Complaints Mechanism Flow Chart



4. Training and Awareness

If the Complaint unit realizes that training or awareness program is required for a particular or whole group, then the complaint unit requests the factory to arrange adequate training sessions for particular group of people or can hand over the issue to RSC Training dept. to take the necessary steps to run the awareness program. If immediate concern/awareness creating is necessary on a particular issue, then RSC OSHCM will arrange pamphlet distribution for particular group of that factory or for all group of people of that factory.

5. Publication and Information Management

All complaints final Status, summary description and summary outcome will be uploaded to the RSC websites after closing the complaints. The anonymity of the complainant or any sensitive information will not be disclosed, but reporting will be in a neutralized form.

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6. List of Acronyms & Abbreviations

AOA	Articles of Association
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
CAP	Corrective Action Plan
CSO	Chief Safety Officer
CS	Complaint Specialist
DIFE	Department of Inspection for Factories and Establishments
FFC	Fair Factories Clearing House
FI	Factory Investigation
FM	Factory Management
HOD	Head of the Department
ILO	International Labour Organization
IS	Information Specialist
MOA	Memorandum of Association
MoLE	Ministry of Labour & Employment
NEBOSH	National Examination Board in Occupational Safety and Health
NON-OSH	Non-Occupational Safety & Health
OSH	Occupational Safety & Health
OSHA	Occupational Safety and Health Administration
OSHCM	Occupational Safety & Health Complaint Mechanism
PC	Participation Committee
QC	Quality Control
RPD	Remediation Program Department
RSC	RMG Sustainability Council
SC	Safety Committee
SOP	Standard Operating Procedure
TE	Technical Expert
TU	Trade Union
WHO	World Health Organization



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7. Reference List

- The National Institute for Occupational Safety and Health (NIOSH), 1996
- The ILO Safety and Health at Work Act 2005, The Workplace (Drinking Water) Regulations 2007
- United Nations Guiding Principles (UNGP) on Business and Human Rights, 2011
- National Labour Policy, 2012
- National Occupational Safety & Health Policy, 2013
- Occupational Safety and Health Administration (OSHA), 2015
- Bangladesh Labour Act 2006 & Bangladesh Labour Rules 2015
- ILO Safety and Health at The Heart of The Future of Work (1919-2019)
- RSC Joint Stock License 2020
- 2020 BGMEA-ACCORD Agreement on the Transition to RSC
- National Profile on Occupational Safety & Health in Bangladesh 2019, Endorsed by National Industrial Health and Safety Council on 22 September 2019, published by: Department of Inspection for Factories and Establishments, Supported by: International Labour Organization (ILO), Publication: 1 July 2021
- The International Accord Protocol Pack, 2021
- The Constitution of the People’s Republic of Bangladesh
- RSC Memorandum of Association & RSC Articles of Association
- International Labor Organization Conventions and Recommendations
- National Examination Board in Occupational Safety and Health (NEBOSH)
- National Plan of Action on Occupational Safety and Health 2021–2030, 14 SEPTEMBER 2021, DIFE, MOLE. Published by: Department of Inspection for Factories and Establishments, Supported by: International Labour Organization (ILO), Publication: 1 October 2021
- Bangladesh Labour Rules- Amendments 2022
- Occupational Health, WHO



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8. SOP Revision History

Row	Version	Date	Addition/Changes	Tracking Notes
1	RSC-OSHCM-2024-SOP	<p>Last review Date: 15 November 2023</p> <p>Approval & Implementation date: 18 January 2024</p>	<p>Revision 03</p> <p>Page 03: 2 Scope Para 01: confidentially with the RSC.</p> <p>Added para 02-05 Para 02: Occupational Safety and Health related issues: Occupational Safety and Health (OSH) includes elements such as denial of fire, electrical, structural or boiler safety related issues, personal protective equipment, maternity & sick leave, excessive working hours, forced overtime, sexual harassment and workplace violence, workplace accident/injury and disease, health & hygiene. OSH includes pay which relates to occupational safety and health, such as sick pay, maternity pay and payments of any nature which may have been impacted because of reprisal actions against those who have pursued a claim under safety and health but does not include general payments, such as overtime pay, wage levels, Eid bonuses, etc.</p> <p>Para 03: COVID 19 issues: By Steering Committee agreement (28 April 2020), the OSHCM treats complaints related to the economic impact of the COVID-19 health crisis on employees/workers as OSH (e.g., non-payment of wages or retrenchment without payment of dues. COVID -19 period: March 2020 to April 2021.</p> <p>Para 04: Reprisal issues: Workers who utilize the Safety and Health Complaints Mechanism cannot face any form of retaliation or reprisal for submitting a complaint to the RSC.</p> <p>Para 05: Non-OSH issues: Other issues which are not included in the above-mentioned criteria will be considered as Non-OSH complaints. Following the - RSC protocol complaints mechanism</p>	<p>Reviewed By: HoD- Ovijit Mutsuddi, Sr. HoD-Sefat Ahmed, CSO- Hassan Nawazis</p> <p>Approved By: MD- Abdul Haque</p>

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		<p>unit forwarded those complaints to the concern Factory, signatory brands/companies in a business relationship with that factory or concern industry associations and labor signatories and if the complainant so requests, he/she is provided with the helpline number of the Government’s Department of Inspection for Factories and Establishments (DIFE).</p> <p>Page 04: 3 Procedure Added- Para 01</p> <p>Para 01: The operation of the RSC Complaints Mechanism on Safety and Health is an inquisition which practices a restorative justice approach and is collaborative in the implementation of corrective action.</p> <p>Page 04: 3.2 and 3.2.1 was merged and replaced with 3.2. Nature of OSH Complaints</p> <p>3.2 Nature of OSH Added para-10.</p> <p>Para 10: Welfare and others safety: PPE, day care medical center, grievance box, fire drill, tiffin, first aid, drinking water, washing facilities, i.e., Along with the complaints raised by Safety Committee members related to employees/workers safety and health.</p> <p>Added footnote 08.</p> <p>8. Articles 23, 24, 25, 26 and 27 of the International Accord & International Accord Protocol Pack 2021</p> <p>Page 8: 5 Publication: The second line of the 1st para is replaced with-</p> <p>Page 10: 7 Reference list: Added point 12: The International Accord Protocol Pack, 2021</p>		
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2	RSC-OSHCM-SOP-2023	Last review Date: 22 October 2023 Approval & Implementation date: 23 October 2023	Revision 02 The changes are attached in bellow table "Table 1: Changes in a summary between SOP approved in 2022 and SOP published 2023."	Reviewed By: HoD- Ovijit Mutsuddi, Sr. HoD-Sefat Ahmed Approved By: CSO- George Faller, MD- Abdul Haque	Published
3	RSC-OSH-IMP-SOP-2021-022	Last review Date: 8 May 2022 Implementation Date: 01 June 2020	Revision 01 Prepared by ACCORD	Reviewed By: HoWP (KD) Approved By: MD & ACSO (IMH)	

Table 1: Changes in a summary between SOP approved in 2022 and SOP published 2023.

SL	RSC-OSHCM-SOP-2022	RSC-OSHCM-SOP-2023	Remarks
1	Access to OSH CM-1	Purpose 1 & Scope 2	Replaced with New addition
2	Distribution of information on OSHCM-2	-	Removed
3	Means of receiving complaints- 3	Receiving Complaints- 3.1	Redefined
4	Documenting/recording complaints- 5 Determining OSH or NON-OSH- 6 Complaints alleging violation or threat of violence - 15. Information and process management- 20 OSH complaints Determination guide	Nature of Complaints- 3.2	Revised
5	Prioritizing and indicative timescale- 7	-	Removed
6	Obtaining additional information on complaints- 8	Initial/ Preliminary/ Off-site Assessment- 3.3 On-site Assessment/ Factory Investigation- 3.4	Revised
7	Notification of submitted complaints/allegation- 9	Communication/Notification- 3.5	Revised
8	Complaints that required onsite inspection or safety check- 10	On-site Assessment/ Factory Investigation- 3.4	Revised
9	Complaints that factory refutes- 11	Feedback/Reply- 3.6	Revised
10	Complaints requiring meetings and hearings- 12	Resolution Meeting- 3.7	Revised
11	Complaints involving announcements at the factories- 13	Training and Awareness- 4	Revised
12	Complaints alleging reprisal -14	Scope 2: Reprisal Issues	Revised
13	Determination, standard of proof and "make whole" remedy- 16	Determination- 3.8	Revised

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14	Enforcement and application of the Escalation protocol- 17	Escalation Protocol- 3.9	Revised
15	-	Determination of Non-Cooperation – 3.9.1 Failed to implement remedy 3.9.2 De-escalation process 3.9.3	New addition
16	Closing complaints- 18	Closing Complaints- 3.10	Revised
17	Protecting anonymity of complaints 4 Public reporting on complaints- 19	Publication and Information Management- 5	Revised
18	Complaints Flow chart	RSC Complaints Mechanism Flow Chart- 3.11	Revised
19		List of Acronyms & Abbreviations- 6	New addition
20		Reference List- 7	New addition
21		Revision History data- 8	New addition



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