

RMG SUSTAINABILITY COUNCIL (RSC)

MONTHLY UPDATE

JANUARY 2023



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Delivering world-class sustainable workplace safety programmes

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Cover Photo: An image of a "Safety Committee Training" at an RSC covered factory.

RSC at a glance

The RMG Sustainability Council (RSC) is a safety monitoring body in the RMG sector in Bangladesh. It is a private initiative of the Bangladesh Industry, global brands, and global and local Bangladeshi trade unions. The operation of Bangladesh Accord was transitioned to RSC. Our vision is to ensure workplace safety, enabling sustainable business and developing the supply chain.

Our expertise lies in:

- Fire, Electrical, Structural & boiler associated hazards identification in accordance with local & international standards.
- Advise remediation plans to mitigate safety risks.
- Communication & follow up on the identified issues & implement a firm warning procedure to ensure the production facilities do not fall behind on remediation.
- Ensuring enough training & capacity development of the safety committee members in the production facilities to identify & manage workplace safety risks.
- Ensure an independent complaints mechanism that ensures the anonymity of the complainant & follow up on their right to a safe workplace. Going forward we will also have a wing where environmental sustainability will be monitored and assessed.

MONTHLY UPDATE ON INSPECTION PROGRAMME

STATUS OF INSPECTION PROGRAMME (as of January 2023)

This section represents the total number of inspections the RSC has conducted. The RSC inspection programme consists of Structural, Electrical, Fire & Boiler safety inspections. The RSC carried out **9,849** inspections during the RSC period starting June 2020 till 31 January 2023 (among a total of **55,679** inspections by the safety initiative since 2014).

- RSC engineers conducted **710** initial inspections during the RSC period among the total of **7,110** initial inspections.
- RSC engineers conducted **9,139** follow-ups and other safety inspections during the RSC period, among the **48,569** follow-ups and other safety inspections.

Following the initial inspections, the factory and the Brands are tasked with developing a Corrective Action Plan (CAP), which details time bound remedial actions (based on the severity of the findings) for completion. Follow-up inspections are conducted to monitor the remediation and verify that corrective actions have been completed correctly. Each factory is inspected on average approximately once every six months.

1693 inspected RSC-covered factories, among which,

During the RSC period (from 1 June 2020 up to 31 Jan 2023)

- Initial inspections: **709**
- Follow-up inspections: 5,714 (31.90% structural inspections, 37.74% electrical inspections, 31.36% fire inspections)

Total initial and follow-up inspections (since 2013 up to 31 Jan 2023)

- Initial inspections: **5078**
- Follow-up inspections: **35224** (22.71% structural inspections, 39.24% electrical inspections, 38.05% fire inspections)

Special and Verification Inspections

In addition to regular follow-up inspections, RSC engineers also conduct special and verification inspections, including the following:

- **Testing & commissioning verification inspections (T&CVIs)** to verify that the installation of the fire detection and protection systems has been completed, as indicated by factories in their CAP. During this inspection, the engineers utilise specific guide sheets to ensure that all components of the system are

functioning adequately. 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, Pre-T&CVI on-site documentation and equipment reviews were introduced in May 2019 at factories. The goal of such a Pre-T&CVI on-site review is for the engineers to determine whether the factory is ready for a full functional T&CVI.

- **Negative suction noncompliance related inspections.** T&CVIs conducted in early 2018 revealed that approximately a third of covered factories had installed the pump of the fire protection/hydrant/sprinkler systems using negative suction, which is non-compliant with the RSC inspection standard (NFPA). RSC engineers have since conducted visits at the covered factories to identify solutions to resolve the negative suction situation, such as installing a vertical turbine fire pump or changing the position of the water reservoir vis-à-vis the fire pump.
- **Boiler safety inspections.** Between 2018-2020 the Accord ran a Pilot Boiler Safety Programme at Accord-covered (now RSC-covered) factories. Initial boiler safety inspections conducted at 20 covered factories revealed significant boiler safety hazards, including non-compliant or missing boiler components/parts and a lack of proper certification. The boiler safety findings have been included in the factories’ CAPs. Boiler safety is being integrated in the RSC’s inspection and remediation programme, which means that all covered factories will receive boiler safety inspections.

The safety remediation is no longer monitored at factories in the following cases:

- At supplier factories that have been made ineligible for business with RSC participating companies as a result of failure to participate in the RSC prescribed Safety Programme.
- At supplier factories that are no longer covered under the RSC programme and have been transferred to the Government of Bangladesh.

The engineering, training and complaints-handling teams often work together to ensure that factory owners complete the remediation and that newly found safety hazards are corrected under the supervision of the factory Safety Committee.

The RSC is committed to inspecting each covered factory at regular intervals to make sure the remediation is on track and immediate life-threatening issues are remediated by the factories. But during the COVID-19 pandemic (2020 & 2021), the RSC couldn't continue its field operations at a regular pace. This caused RSC to improvise and come up with the inspection priority categorization. Inspection priority categorization aimed to make sure that all the covered factory get the RSC inspection fairly, with a focus on the cases that need the RSC’s most attention. With time the RSC inspection process has been constrained by the COVID-19 outbreak and strictly enforced lockdown across the country in recent months, many factories and associated Brands are keen to receive inspections to verify the remediated CAP items.

That is why on 31 August 2021 the RSC Executive Committee approved 3 new inspection prioritization categories based on which the RSC has been scheduling inspections since 5 September 2021.

MONTHLY UPDATE ON SAFETY REMEDIATION

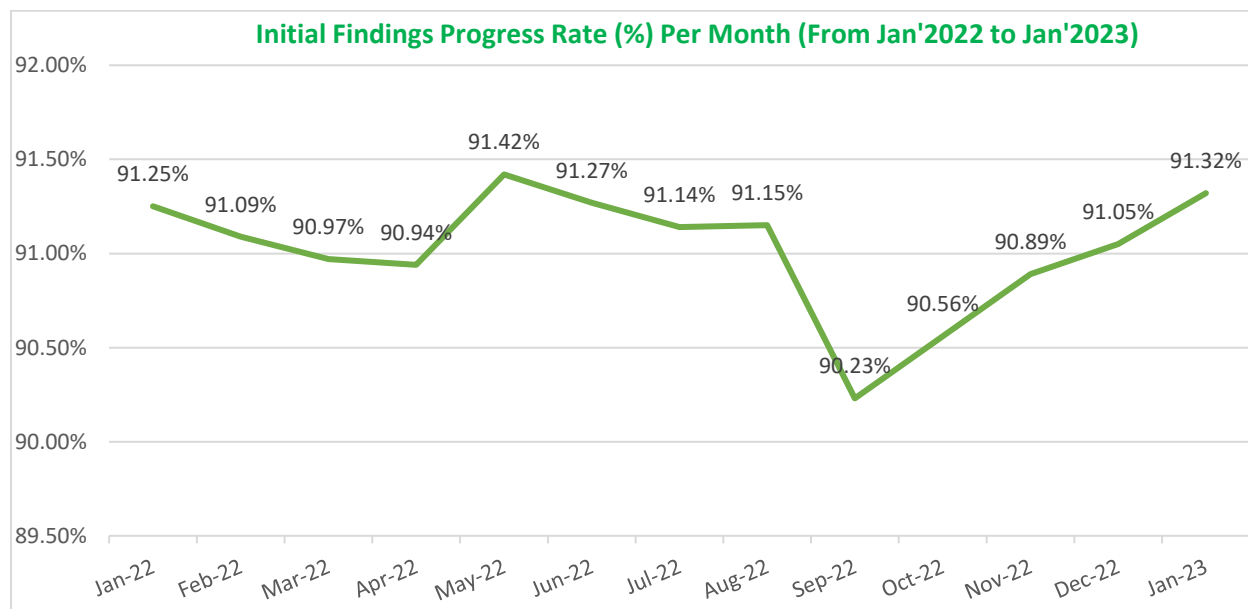
SAFETY REMEDIATION PROGRESS (as of January 2023)

Progress & completion rates of safety remediation at RSC-covered factories:

- The Total number of factories covered by the RSC is **1,828**.
- Among these **1,693** factories are inspected and **135 newly enlisted** factories still remain to be inspected.
- **91.32%** initial remediation progress, overall including structure, electrical, and fire.
- **500** factories completed the initial remediation.
- **>90%** initial remediation at **1,300** factories (800 factories excluding those that completed the initial remediation).
- **91.29%** of covered factories received their Fire Alarm and Detection System design approval as part of the remediation plan.
- **88.26%** of covered factories received their Fire Suppression System design approval as part of the remediation plan.
- **78%** of factories completed structural remediation based on an Engineering Assessment as part of the remediation plan.

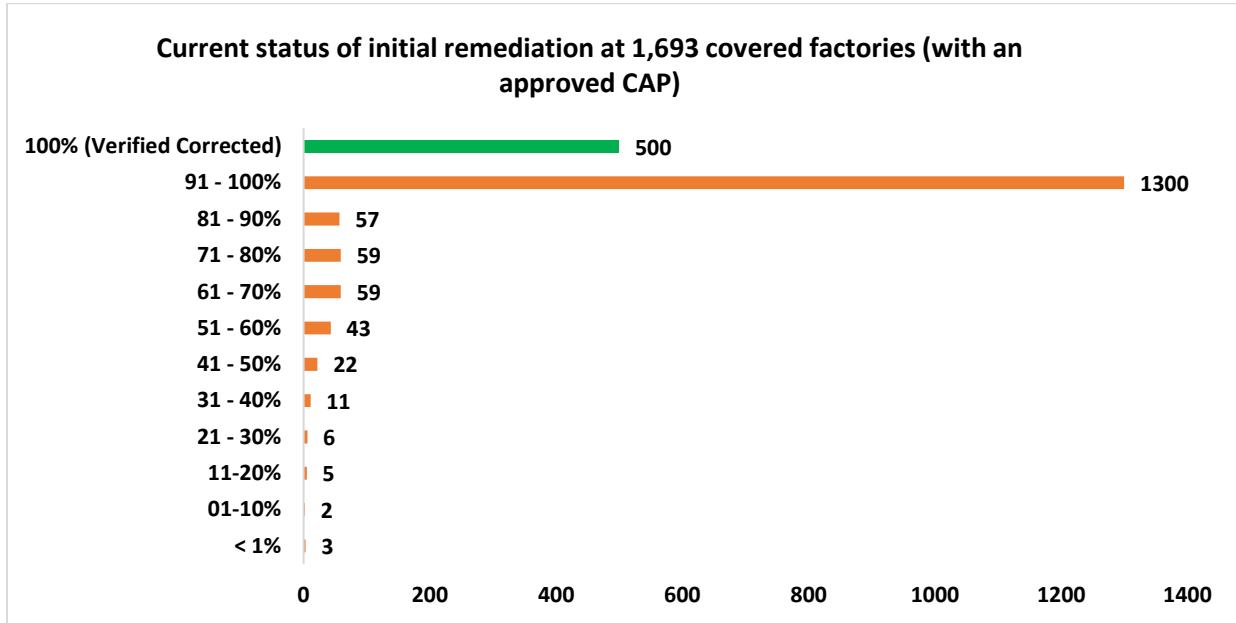
REMEDIATION PROGRESS OF SAFETY ISSUES IDENTIFIED DURING INITIAL INSPECTIONS (as of January 2023)

The following graph corresponds to the status of the overall initial progress rate from January 2022 to January 2023. It is mentioned that the overall progress rate might fluctuate depending on the number of factories being covered, the inspection outcomes and updates received from factories.



STATUS OF INITIAL REMEDIATION AT RSC-COVERED FACTORIES (as of January 2023)

The following graph shows the status of the current remediation progress of initial findings in the RSC-covered factories (as of Jan 2023). Currently, the RSC is working with **1,828** factories. However, out of the total covered factories, **1,693** factories have been inspected during the reporting period. The rest of the factories (135) are yet to be inspected. Among the 1,689 factories, a total of **500** have completed 100% remediation.



The following charts below provide an overview of the status of **inspection findings** that are reported in the published Corrective Action Plans (CAPs).

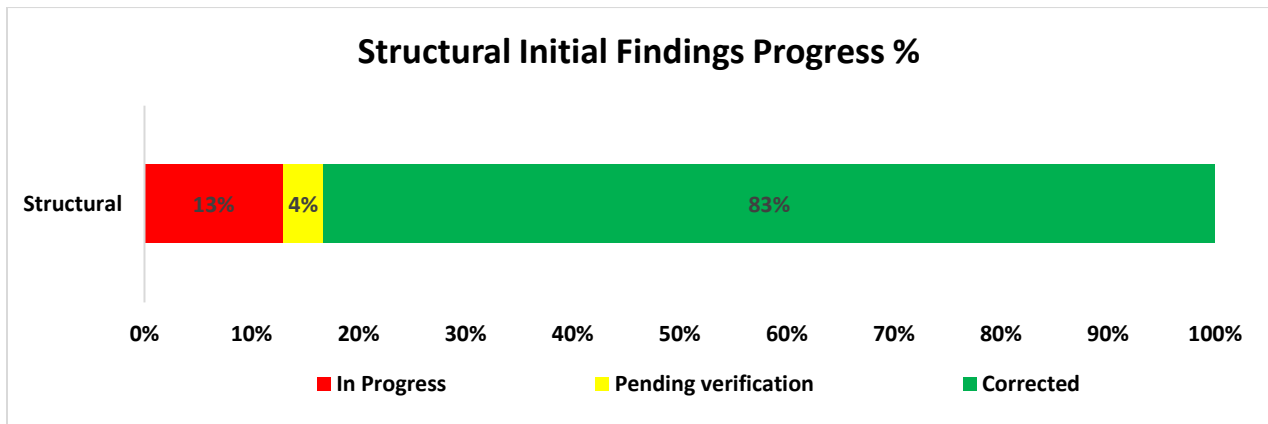
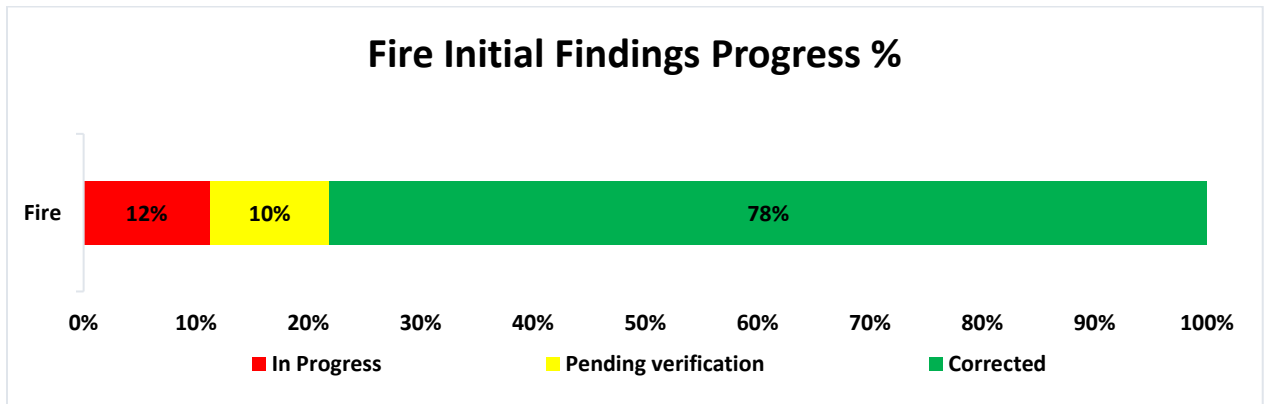
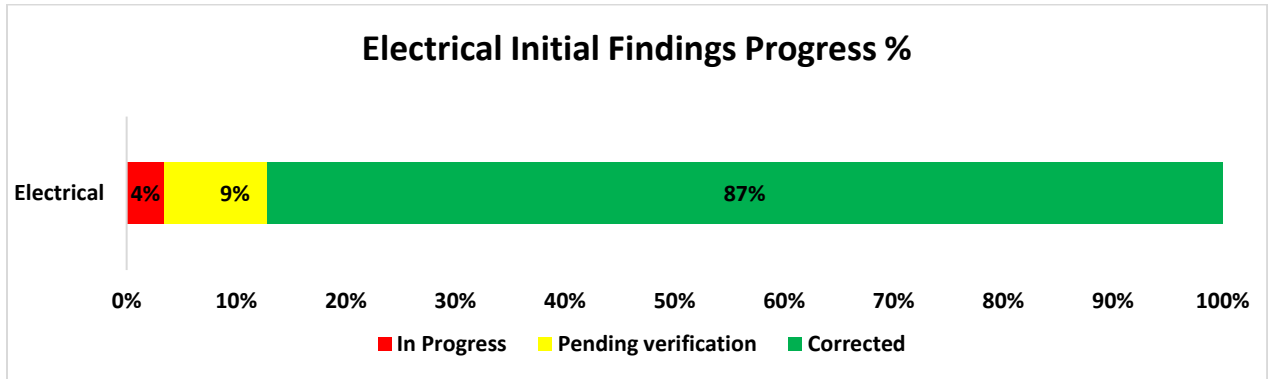
In progress: This is the default status for an inspection finding. It means that remediation of the inspection finding is underway.

Pending verification: The RSC has been informed that the finding has been corrected but the RSC engineers are yet to verify this.

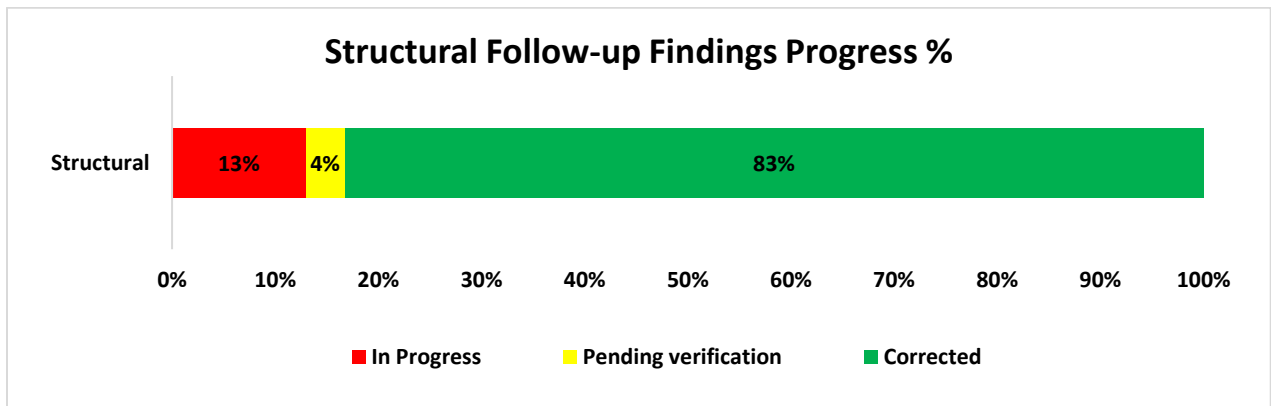
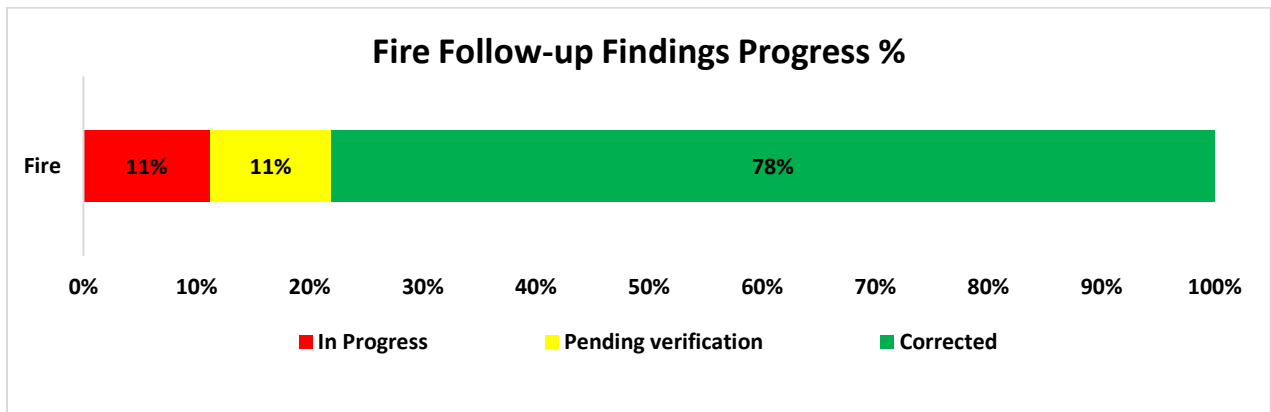
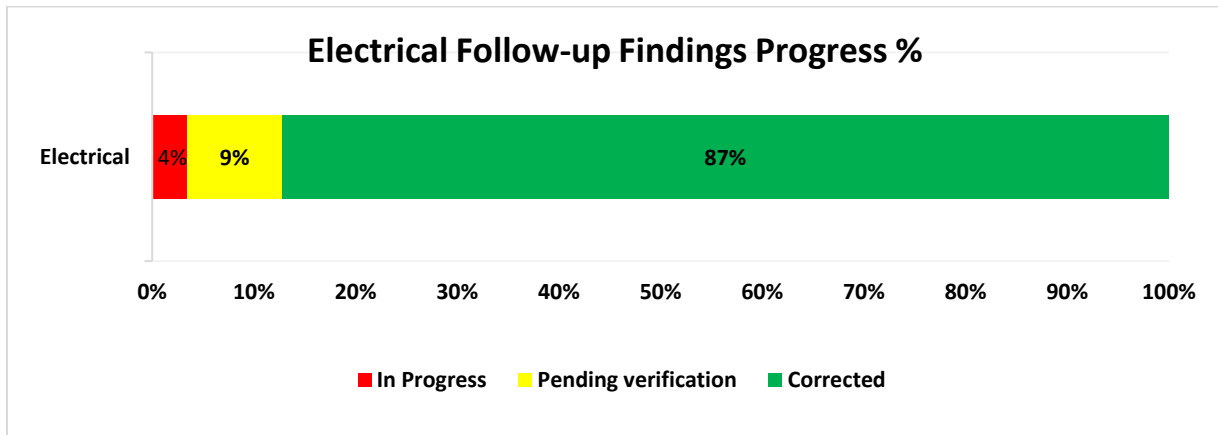
Corrected: The finding has been verified as corrected by the RSC engineers through their follow-up verification visits.

PROGRESS RATE (%) BY DISCIPLINE

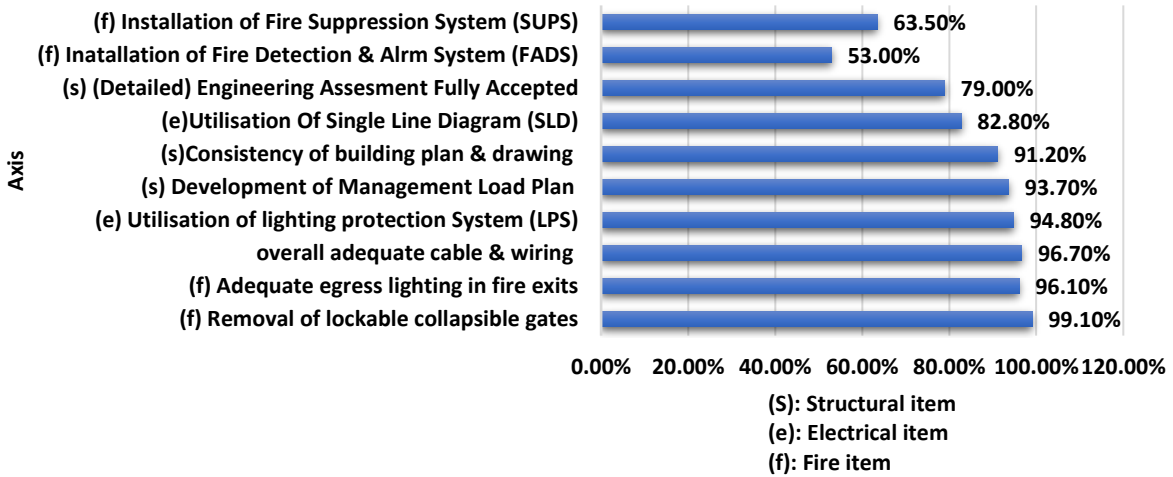
Initial findings progress charts by discipline (as of January 2023)



The charts below represent Follow-up Findings progress by disciplines as of (January 2023)

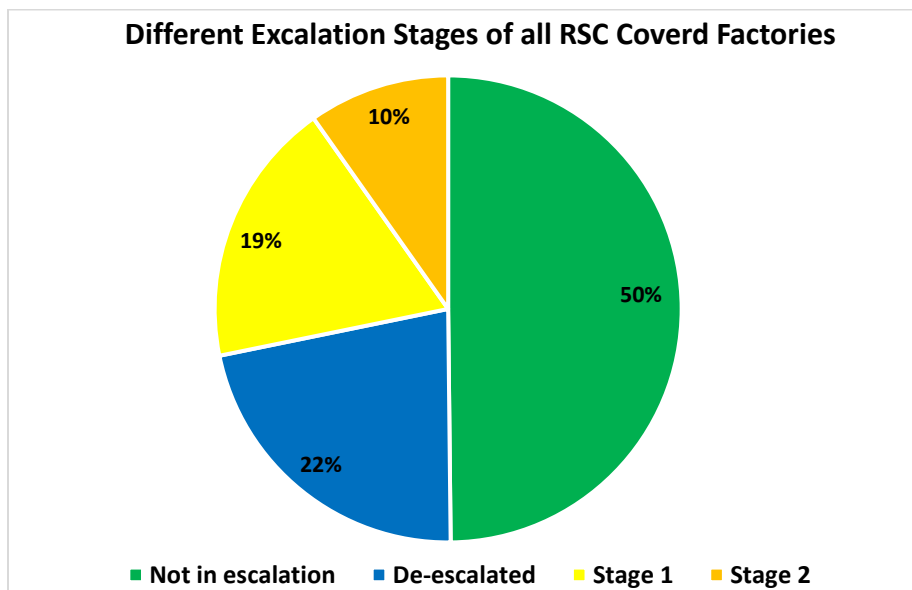


Completion Rate of Common Remediation Items



STATUS OF ESCALATION (as of January 2023)

As of January 2023, a total of **496** factories have been escalated to Stage 1(324) and Stage 2(172). There are **380** factories that were de-escalated after the escalation items were verified by the RSC. Out of the total RSC cover factories of **876** the escalation process. The percentage of different escalation RSC covered (1828) factories is shown in the pie chart below.



MONTHLY UPDATE ON WORKPLACE SAFETY PROGRAMME

STATUS OF OCCUPATIONAL SAFETY AND HEALTH COMPLAINTS MECHANISM (as of January 2023)

Workers at RSC-covered factories, and their representatives, have a right to raise complaints with the RSC Safety and Health Complaints Mechanism to remedy safety concerns that are not being effectively addressed at the factory level. Workers at covered factories, and their representatives, can raise concerns about safety and health risks safely, and if they so choose, confidentially, through the Safety and Health Complaints Mechanism. The Safety and Health Complaints Mechanism also protects complainants from reprisal, harassment, threat, or other retaliatory actions for exercising the right to file a complaint. This protection applies regardless of whether the complaint is determined to be OSH or non-OSH.

All complaints are assessed to determine if they fall under the occupational safety and health remit.

Occupational safety and health complaints are processed by RSC staff specialised in investigating and resolving complaints. RSC complaint specialists are responsible for verifying the delivery of the remedy of all complaints. Where complaints affect the safety of all workers/groups of workers, the RSC announces the findings and remediation requirements to all workers at the factory.

Complaints that fall outside of the remit of the Occupational Safety and Health Complaint Mechanism (i.e., non-OSH complaints) are forwarded to Factory Management, responsible brand and labour signatories.

Complainants alleging issues at factories that are not covered by the RSC are provided with the contact information of the Government's Department of Inspection for Factories and Establishments (DIFE).

Total Complaints Received (1 June 2020 – 31 January 2023)

Since June 2020, the RSC received **3,667** complaints out of which **972** (27%) are Occupational Safety & Health (OSH) related complaints and **2,739** (75%) are non-OSH related complaints.¹

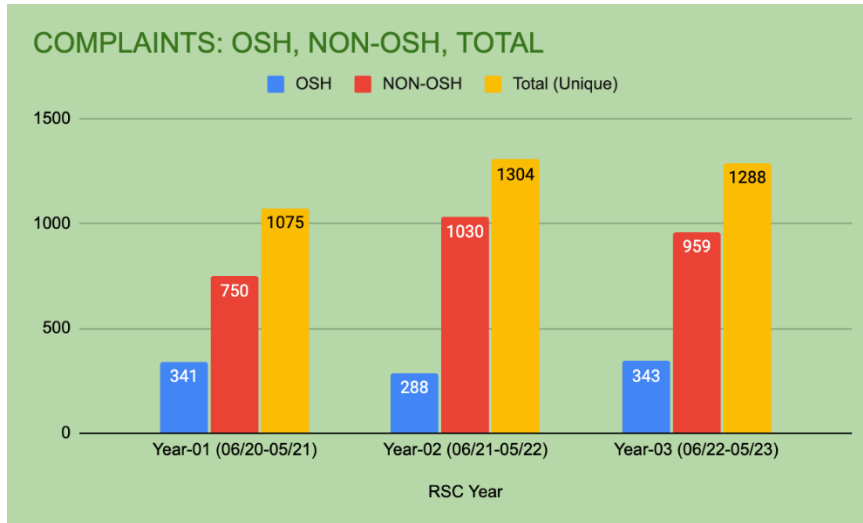
Types of OSH Complaints

- Engineering (structural/fire/electrical safety): **56**
- COVID-19 related: **231**
- Reprisal for having filed a complaint: **20**

No. of OSH Complaints Resolved

Since June 2020, the RSC has resolved **421** complaints.

¹ A complaint may contain both OSH and non-OSH allegations. Percentages therefore add up to more than 100%.



STATUS OF SAFETY COMMITTEE AND SAFETY TRAINING (SCST) PROGRAMME (as of January 2023)

Key functions of the Safety Committee and Safety Training (SCST) Programme

Facilitation of Safety Training

The RSC Safety Committee and Safety Training (SCST) Programme currently consists of 8 training modules conducted through 8 sessions for the members of factory Safety Committee. The training sessions address the Safety Committee's role in identification and remediation of safety and health hazards, how to handle safety and health related complaints and improve communication and joint problem-solving skills. One of the important areas of the training programme is to educate workers and management on the rights and entitlements related to Freedom of Association in relation to protecting their own safety.

As part of the training programme, the factory Safety Committee together with the RSC OSH Facilitator conduct WALK-THROUGH (WT) of the factory to identify actual or any potential safety and health hazards. The factory Safety Committee monitor and negotiate with management on the remediation of the safety issues identified during the WTs.

3 All Employee Meetings

During All Employee Meetings at the factory premises, practical information related to role of safety committee, safe evacuation in case of emergency, common health and safety hazards identification including sexual harassment and workplace violence are shared with all the workers and members of the management. The RSC developed and designed tailor-made information and communication materials on a wide range of occupational safety and health hazards with guidelines on complaints reporting mechanisms. These materials are distributed during the course of the All Employee Meetings among the participants. You can read the RSC information materials by clicking the links below: -

[Booklet for workers I](#)

[Booklet for workers II](#)

[Booklet for workers III](#)

A factory receives a **Letter of Acknowledgement** (LoA) from RSC after participating all the activities designed under the Safety Committee and Safety Training (SCST) Programme

Ongoing Support

To ensure that the Safety Committees are meeting their obligations on factory level safety, the Committees are provided with additional support such as the facilitation of the regular meetings and any other any other ad-hoc basis activities like walk-throughs, coordination with RSC inspection team and Safety committee of the factory ahead of any inspection, collect first information report from the Safety Committee members and conduct investigation immediately after any accidents/incidents takes place at any factory.

RSC SCST Programme at a glance

SCST Programme Features	(As of January 2023)
Ongoing the Safety Committee Training Sessions	317
Yet to commence the Safety Committee Training Sessions	275
SCST Sessions were conducted	10893
Remote SCST sessions	7354
On-field SCST sessions	3539
Walk Through were conducted	5161
Remote WALK-THROUGH sessions	2277
On-field walk-through sessions	2884
Factories received a Letter of Acknowledgement	1223
No. of workers are informed about workplace safety through All Employee Meetings and Informational Sessions	2020780
No. of factories Completed Safety Training for the Safety Committee	1243