

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

15 Jul 2024



Factory Information

FLA Affiliates	Roots
Country	India
Number of Workers	768

Understanding this Report

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

FLA Code Element

Number of Violations

FLA Code Element	Number of Violations
Compensation (C)	3
Employment Relationship (ER)	15
Harassment Or Abuse (H/A)	2
Health, Safety And Environment (HSE)	20
Hours Of Work (HOW)	3

Assessment Information

Assessor	InSync Global
Assessment Date	15 Jul 2024

Assessment Purpose

Factory Assessment (In-Person)

ASSESSMENT RESULTS

Compensation (C)

Benchmark ID	C.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning the payment of compensation to workers.
Finding Details	Compensation paid for overtime hours worked beyond legally permitted limits is not included in the calculation of worker contributions towards the Employees State Insurance Scheme. This exclusion impacts the extent of benefits provided to the worker.
Recommendation for Immediate Action	Ensure compensation paid for overtime hours worked beyond legally permitted limits is included in calculation of worker contribution towards Employees State Insurance Scheme.
Compliance Classifications	Immediate Action Required
Local Law	Notification issued by Ministry of Labor and Employment dated 13th June 2019 (GSR 423(E)) and the Employees State Insurance Act 1948, Section 2(22).
Benchmark ID	C.21.1
Benchmark Details	Employers shall provide all legally mandated benefits, including holidays, leave, bonuses, severance payments and 13th month payments to all eligible workers within legally defined time periods.
Finding Details	A review of pay records for terminal dues for five sampled workers revealed that the payment of wages for days worked prior to leaving employment and wages for unused leave as part of terminal dues was delayed for three workers by 4, 6, and 40 days from their date of leaving employment.

Recommendation for Immediate Action	Ensure that wages for days worked prior to leaving employment and wages for unused leave, which are part of terminal dues, are paid within legally defined timelines.
Compliance Classifications	Immediate Action Required
Local Law	Item 13(3) of Schedule 1 appended to Industrial Employment (Standing Orders) Rules 1946 and the Factories Act 1948, Chapter VIII Section 79.
Benchmark ID	C.15.1.1
Benchmark Details	Employers shall provide workers a pay statement each pay period and not less frequently than once a month, which shall show earned wages.
Finding Details	The pay slip provided to workers does not include information on compensation for overtime hours worked beyond legally permitted limits.
Recommendation for Immediate Action	Ensure pay slip provided to workers includes complete information on compensation paid for all overtime hours.
Compliance Classifications	Immediate Action Required
Local Law	Minimum Wages Central Rules 1950- Rule 26 (2).

Employment Relationship (ER)

Benchmark ID	ER.17.5
Benchmark Details	Employers shall have in place procedures to track the number, types, and timing and resolution of grievances, and to communicate the resolution of grievances to the workforce.

Finding Details	The factory maintains documentation related to grievances. However, the log for grievances reported directly to management lacks information on the date of resolution, status (open, closed, in-progress, partially closed), and worker signatures confirming satisfaction with the resolutions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.1.2
Benchmark Details	Employers shall assign responsibility for the administration of human resources to a clearly defined and adequately qualified staff member or staff members and ensure workers at all levels receive communication and training about existing policies and procedures or any revisions.
Finding Details	In the past 12 months, training on the Code of Conduct was provided to only 7% of workers. The factory lacks a training calendar and a plan to train the complete workforce.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.18.2
Benchmark Details	Employers shall ensure managers and supervisors are fully familiar with the workplace disciplinary system and in applying appropriate disciplinary practices.

Finding Details	Supervisors and managers understand basic workplace conduct expectations in their interactions with workers. However, specific training on workplace conduct and discipline was not provided to them. The HR team maintains all discipline-related procedures.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.5.1
Benchmark Details	Employers shall ensure that all supervisors are trained in national laws, workplace regulations, and the FLA Code, workplace grievance systems, and the appropriate practices to ensure compliance.
Finding Details	Factory does not provide any specific training to supervisors that includes all FLA's Code elements and Employment Functions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.17.1
Benchmark Details	Employers shall have a clear and transparent system of worker and management communication that enables workers to consult with and provide input to management. This might include suggestion boxes, worker committees, designated spaces for worker meetings, union representatives, and meetings between management and workers' representatives.

Finding Details	1. The welfare officer is not included in the grievance redressal committee. 2. The chairman of the grievance committee is not rotated every alternate year as legally required. 3. The location, date, and time of opening the complaint boxes are not recorded in the log. The only written statement in the log is "no complaints found in the month." Additionally, the complaint box is opened only once every 15 days, which may discourage use as workers must wait for the box to be opened.
Recommendation for Immediate Action	1. Ensure the welfare officer is included in the grievance redressal committee. 2. Ensure the chairman of the grievance committee is rotated every alternate year as legally required. 3. Ensure the location, date, and time of opening the complaint boxes, along with information on the number of concerns found in each box, are recorded in the log maintained for this purpose.
Compliance Classifications	Immediate Action Required
Local Law	Industrial Disputes Act 1947- Section 9C (3)
Benchmark ID	ER.17.6
Benchmark Details	Employers shall have a system in place to prevent retaliation against or discrimination towards workers who are filing grievances, including grievances regarding harassment, abuse, violations of factory procedures, compensation, or unsafe working conditions
Finding Details	The factory has a system in place to prevent retaliation against workers who report concerns, and workers interviewed confirmed they can report concerns without fear of retaliation. However, the factory does not have a written policy and procedures for non-retaliation.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Benchmark ID	ER.1.1
Benchmark Details	Employers shall have in place written policies and practices and maintain proper and accurate records governing all aspects of employment from recruitment, hiring and probation, including written terms and conditions of employment, job descriptions, administration of compensation, and working hours for all positions, through to retrenchment and termination processes.
Finding Details	1. The factory does not have written policies and procedures for recruitment process, and there is no written information on the use of outsourced security and housekeeping services. 2. Although there are written procedures for hiring production workers, they do not address the need for periodic reviews to ensure employment documentation is accurate and up-to-date. 3. The factory lacks written procedures on non-discrimination. 4. There are procedures related to child labor refer to recruitment and hiring documents but the procedures do not outline steps for verifying the age of new recruits when falsified age documentation is suspected, such as cross-verification by a doctor. 5. The procedures for termination do not include details on calculating dues and payment timelines based on the reason for termination (e.g., resignation, retirement, or dismissal). 6. Job descriptions for production workers do not specify reporting authorities like supervisors or production managers, and some descriptions are inaccurate. For example, the job description for stain removers mistakenly includes tasks relevant to a pressman. Additionally, job descriptions are not provided to workers upon hiring.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.7.1

Benchmark Details	Employers shall have written policies and procedures with regard to performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement/disagreement from employees in writing, and that follow all local legal requirements.
Finding Details	1. Written procedures on performance evaluation do not include the need to document evaluation results, discuss them with workers, or obtain feedback and agreement on the results. 2. The performance of production workers is evaluated only when there are vacancies, and performance is not evaluated for non-production workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.8
Benchmark Details	Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements.

Finding Details	<p>1.The factory does not have written procedures for promotions and job re-assignments. (As a policy, workers are not demoted, so there is no information on demotions) 2. The production team shortlists workers based on observations and evaluates their performance, but no documentation is maintained for these evaluations. The final list with recommendations for wage increases and promotions is forwarded to top management for approval. Once approved, the list is shared with the HR team for implementation and verbal communication to the promoted workers. There is no documentation for the processes followed except for the final approved list. Evaluation results are not documented, shared, or signed by workers. The lack of formal evaluation procedures and documentation poses a risk of unfair and non-transparent evaluations and promotions.</p>
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.4
Benchmark Details	<p>Employers shall inform workers about workplace rules, environmental protection systems, health and safety information, and laws regarding workers’ rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace’s common areas.</p>
Finding Details	<p>1. The factory does not provide regular communication to workers on the company or FLA Code of Conduct and workers are not aware of the name of the member company.</p>
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required

Local Law	
Benchmark ID	ER.19.1
Benchmark Details	Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws.
Finding Details	<p>1. The factory's written procedures require contracts to be signed on the day of hiring. However, contracts were not signed with 12 workers hired in July 2024 until 1 to 15 days after hiring, despite these workers starting work on their hiring day. Management explained that delays occur because the HR team is occupied with wage payments until the 10th of each month. 2. The employment contract signed by workers states that applicable benefits will be provided as legally required but does not specify or describe these benefits. Additionally, there is no information on legally mandated deductions from wages for social security and Employees State Insurance. 3. The factory does not provide a letter of promotion to communicate changes in position and wage increases. Such changes are communicated verbally by the HR team, which could lead to miscommunication. 4. Workers' service cards have not been updated with wage increases since 2016. 5. The factory lacks a system for periodic inspection and updating of worker data in individual worker files.</p>
Recommendation for Immediate Action	<p>1. Ensure employment contracts are signed with workers before they start work. 2. Ensure the terms of employment, including benefits and legally mandated deductions, are clearly communicated in the contracts. 3. Ensure workers are provided with a letter of promotion detailing changes in job title and wage increases. 4. Ensure workers' service cards are updated with current wages payable. 5. Implement a system for periodically updating the employment history of workers.</p>
Compliance Classifications	Immediate Action Required
Local Law	4. Industrial Employment (Standing Orders) Rules 1946, Form V, appended to Schedule 1-B: Service Card.
Benchmark ID	ER.3.1

Benchmark Details	Employers shall provide an orientation to new employees at the time of hiring, which includes explanations of the employers' rules, compensation package and policies for human resources, grievance systems, industrial relations, including respect of the right to freedom of association, workers' rights and responsibilities, FLA Code of Conduct, health and safety, and environmental protection.
Finding Details	The workers do not receive a orientation training. Workers are only made aware of working hours, breaks, and wages when contracts are signed.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.1.3
Benchmark Details	Employers should implement an annual, review process with input from workers of all policies, procedures and their implementation to ensure they meet legal requirements and the FLA Workplace Code.
Finding Details	Workers are consulted regarding changes in work hours during the winter months, but they are not consulted on the creation or revision of policies and procedures.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.17.2

Benchmark Details	There shall be a mechanism that allows workers to report harassment and grievances confidentially, including any concerns or problems they may be experiencing around legally owed payments during a retrenchment process.
Finding Details	Review of the grievance log for the confidential complaint box revealed two grievances reported in the past 12 months, related to inadequate lighting in the checking area. The A4 paper used for grievances appeared fresh with no fold marks and they were not collected directly from the boxes but written on new paper. The responsible management person admitted that slips collected from the boxes were torn and crushed, so concerns were rewritten on fresh paper, and the torn slips were disposed of. Worker names and employee codes were recorded on the new papers. The management person lacked understanding of the confidential reporting system, and no training was provided for effective implementation of the system.
Recommendation for Immediate Action	1. Ensure workers understand how to report grievances using available channels. 2. Provide training to management personnel on the use of the confidential reporting channel and ensure accurate documentation is maintained.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	ER.3.3
Benchmark Details	Workers should be provided with written documentation that substantiates all the issues covered in orientation briefings.
Finding Details	The factory does not conduct an orientation program for new workers, despite its written policy requiring one. Workers are only made aware of working hours and wages after signing their contracts. A document listing topics such as the Code of Conduct and factory policies is provided for workers to sign, acknowledging attendance at the orientation program. However, none of the sampled workers interviewed were aware of such an orientation program and confirmed they were only informed about working hours and wages at the time of hiring.

Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Harassment Or Abuse (H/A)

Benchmark ID	H/A.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment and abuse, including that which is gender-based
Finding Details	Penalties for sexual harassment in the workplace are not posted in the factory, which required by law.
Recommendation for Immediate Action	Ensure penal consequences of sexual harassment at workplace are posted in the factory.
Compliance Classifications	Immediate Action Required
Local Law	Sexual Harassment of Women in the Workplace Act 2013, Section 19(b).

Benchmark ID	H/A.8.3
Benchmark Details	Employers, shall develop, implement and monitor policy and procedures for eliminating the risk of violence, harassment, and abuse in the workplace. Policies and procedures shall include a clear statement that violence, harassment, and abuse will not be tolerated, procedures for the investigation of allegations, and measures to protect any complainants, victims, and witnesses.
Finding Details	The written procedures on harassment do not include the requirement to train all employees on the related procedures.

Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Health, Safety And Environment (HSE)

Benchmark ID	HSE.30.1
Benchmark Details	Employers shall develop, maintain, and regularly review health, safety, and environmental policies to ensure that they comply with all national laws, regulations and the FLA Workplace Code concerning health, safety, and environmental standards, regulations and procedures.
Finding Details	The written emergency response procedures include evacuation steps, however lack details on the responsibilities of firefighting and first aid teams. In addition, the Health and Safety procedures do not include steps for ensuring machine safety and replacing damaged PPE.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.6.2
Benchmark Details	A sufficient number of workers shall be trained in first aid and firefighting techniques. Training shall be upon hire and with periodic refresher training.

Finding Details	1. Specific responsibilities, such as evacuating special category workers, operating fire hydrants, activating alarms, managing the evacuation process, and alerting emergency services, are not assigned to the firefighting team. 2. Because specific responsibilities are not assigned to the firefighting team, they do not receive the necessary training to execute their responsibilities.
Recommendation for Immediate Action	1. Ensure specific responsibilities are assigned to the firefighting team 2. Provide additional training to the firefighting team based on their specific responsibilities to ensure they are well-prepared for their roles.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.5.1.6
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: evacuation procedures and fire drills
Finding Details	Factory does not conduct an assessment after a fire drill to improve the evacuation process.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.19
Benchmark Details	All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical, and safety and health regulations.

Finding Details	1. Broken wooden and plastic chairs, metal fittings, iron wire mesh, broken plastic buckets, paper waste, and polythene waste are stored in multiple open locations around the periphery of the factory buildings. 2. The toilets are not clean or sanitized, and soap and hand drying facilities are not provided.
Recommendation for Immediate Action	1. Ensure that broken wooden and plastic chairs, metal fittings, iron wire mesh, broken plastic buckets, paper waste, and polythene waste are stored in designated spaces. 2. Ensure that toilets are kept clean at all times and that soap and hand drying facilities are provided in all toilets.
Compliance Classifications	Immediate Action Required
Local Law	1. Factories Act, 1948-Section 7A (2b) 2. Factories Act, 1948-Section 19(1) (a) and Factories Act, 1948-Section 19(1) (d)
Benchmark ID	HSE.13
Benchmark Details	All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.
Finding Details	1. Taped cords were observed on several open electrical junction boxes in the fabric and accessories storage areas, as well as in the carton storage area between the two buildings and on the production floors. 2. Partially damaged electrical power source boxes connected to sewing machines were found in the sewing sections. Stitched garments were hanging near these damaged boxes, and poly bags were placed close to them. The damaged boxes can accumulate thread and dust, posing a fire risk.
Recommendation for Immediate Action	1. Replace taped cords with continuous cords and ensure that electrical junction boxes are properly closed in the fabric, accessories, and carton storage areas, as well as on the production floors. 2. Replace partially damaged electrical power source boxes and conduct regular inspections to ensure damaged boxes are not used. Store garments and poly bags away from electrical switch boxes.

Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b)
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1. Traffic lanes are not marked inside the factory to ensure safe movement of workers during entry, lunch breaks, and exits. 2. Two of the three ladders randomly checked in the maintenance area lacked anti-skid stoppers on their legs, posing a risk of injury to workers using them. 3. The factory does not use a Lock-Out Tag-Out (LOTO) system.
Recommendation for Immediate Action	1. Ensure traffic lanes are marked inside the factory for the safe movement of workers during entry, lunch breaks, and exit. 2. Install anti-skid stoppers on the legs of ladders used by maintenance team. 3. Ensure LOTO (Lock-out Tag-out) system is implemented.
Compliance Classifications	Immediate Action Required
Local Law	1. Factories Act, 1948-Section 7A (2b) 2. Factories Act, 1948-Section 7A (2b) 3. Factories Act, 1948- Section 24 (3)
Benchmark ID	HSE.6.1
Benchmark Details	All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers.
Finding Details	The firefighting team is not provided with PPE, including breathing apparatus.
Recommendation for Immediate Action	Provide necessary PPE to the firefighting team.

Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
Finding Details	1. The factory does not train the Health and Safety committee. 2. The dining area seats only about 20% of workers, forcing others to eat on the floor, stairs, or production areas. 3. Waste materials such as polyfill, fabric, damaged chairs, and plastic containers are stored under the staircase, posing a fire risk. 4. Garments and poly bags are stored near electrical switches and circuit breakers, increasing the risk of fire. 5. Electric cords connecting sewing machines lie on the floor near stool legs, risking entanglement and impeding quick evacuation.
Recommendation for Immediate Action	1. Ensure that training is provided for the Health and Safety committee. 2. Ensure that adequate seating capacity is made available in the dining areas and encourage workers to use these areas. 3. Ensure that waste materials, such as polyfill used in jackets, fabric, damaged chairs, and plastic containers, are stored in designated storage areas. Areas under staircases should be kept clear at all times. 4. Ensure that garments and poly bags are stored away from electrical switches and circuit breakers. 5. Ensure that electric cords connecting sewing machines to the power source are securely fixed to allow for quick and easy movement of workers in case of evacuation.
Compliance Classifications	Immediate Action Required
Local Law	2. Delhi Factories Rules 1950- Rule 66(1). 3. Factories Act, 1948- Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
Benchmark ID	HSE.28

Benchmark Details	Employers shall create a system to ensure that all necessary Health and Safety protections are provided for external contractors; including protection when working within , confined spaces, maintenance issues, and general Health and Safety Issues.
Finding Details	The factory does not provide safety information to contractors responsible for cleaning confined spaces, maintaining factory buildings, or servicing power generators and lifts.
Recommendation for Immediate Action	Provide safety information to contractors responsible for cleaning confined spaces, maintaining factory buildings, or servicing power generators and lifts.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b)
Benchmark ID	HSE.14.3
Benchmark Details	Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers.
Finding Details	Safe operating instructions are not posted near the machinery, including sample embroidery machines, washing machines, boilers, and compressors, used in the factory.
Recommendation for Immediate Action	Post safe operating instructions near all machinery (embroidery machines, washing machines, boilers, compressors) in the local language for easy understanding by operators.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b)
Benchmark ID	HSE.29
Benchmark Details	Employers shall provide all necessary protection for workers when working at heights, confined spaces, and other high-risk areas.

<p>Finding Details</p>	<p>1. Entry to confined spaces is covered with metal lids; however, warning signs are not posted near confined spaces to alert workers. 2. According to management, confined spaces are cleaned by external service providers, and the factory does not monitor the process. The factory lacks written policies and procedures to ensure safety and the use of appropriate and adequate PPE (such as helmets, safety ropes, adequate lighting, breathing apparatus, and gas detectors) by individuals entering confined spaces. The factory does not maintain a log for the cleaning of confined spaces. 3. Helmets are not provided to maintenance workers who work at heights. 4. The factory does not have a system for periodic inspection of maintenance equipment and tools, such as drilling machines, grinding machines, tool-sharpening machines, and welding machines.</p>
<p>Recommendation for Immediate Action</p>	<p>1. Post warning signs near confined spaces to alert workers. 2. Ensure there are written policies and procedures in place to monitor and ensure the safety of individuals entering confined spaces by using appropriate and adequate PPE (helmets, safety ropes, adequate lighting, breathing apparatus, and gas detectors). Maintain a log for individuals entering confined spaces for cleaning or maintenance work. 3. Provide helmets to maintenance workers who work at heights. 4. Maintain equipment and tools like drilling machines, grinding machines, tool sharpening machines, and welding machines are inspected periodically and logged.</p>
<p>Compliance Classifications</p>	<p>Immediate Action Required</p>
<p>Local Law</p>	<p>1 and 2. Factories Act, 1948- Section 36 (2) (b) and Factories Act, 1948- Section 36 (2) (a) 3. Factories Act, 1948- Section 32(c) 4. Factories Act, 1948-Section 7A (2b)</p>
<p>Benchmark ID</p>	<p>HSE.17.2</p>
<p>Benchmark Details</p>	<p>Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided.</p>
<p>Finding Details</p>	<p>Factory does not provide training on ergonomics and lifting techniques.</p>
<p>Recommendation for Immediate Action</p>	<p>Ensure training on ergonomics and lifting techniques is provided.</p>

Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b)
Benchmark ID	HSE.18.1
Benchmark Details	Medical facilities shall be established and maintained in factories as required by applicable laws.
Finding Details	The factory does not employ a full-time doctor in the medical room. Instead, it has an agreement with a local hospital for medical facilities. An examination bed is not provided; instead, 2 rest beds are used as examination beds.
Recommendation for Immediate Action	Ensure a qualified medical practitioner is available in the medical room during work hours.
Compliance Classifications	Immediate Action Required
Local Law	Delhi Factories Rules 1950 - CHAPTER V, WELFARE, Sub-section 3 of Section 45. - Rule 64.
Benchmark ID	HSE.30.2.4
Benchmark Details	The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system including a HS&E risk assessment within which the following are clear and regularly tested and reviewed: procedures that enable workers to raise health, safety, and environmental concerns.
Finding Details	The factory has a system in place to safeguard workers who report concerns, but it lacks written policies and procedures to protect those who raise issues.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required

Local Law	
Benchmark ID	HSE.30.2.6
Benchmark Details	The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system including a HS&E risk assessment within which the following are clear and regularly tested and reviewed:protections to workers who allege health, safety, and environmental violations;
Finding Details	A review of the risk assessment conducted by the factory in May 2024 revealed that the "probability" of the assessed risks was not considered. Information on the types of possible workplace injuries and the number of people impacted is missing. Control measures are limited to engineering controls and do not include administrative controls, such as training and awareness programs. The environmental control measure for handling needles with blood stains from accidental finger pricks or sewing machine use only states that needles will be stored separately, without detailing sterilization and disposal processes. Additionally, while the risk of land pollution from machine storage was identified, the risk of fire was not, making the assessment results inaccurate and incomplete.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.30.2
Benchmark Details	The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system within which the following are clear and regularly tested and reviewed; procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) and environmental emergencies

Finding Details	The factory tracks all injuries but does not investigate their root causes. (No accidents were reported during the assessment period)
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.7
Benchmark Details	Workers shall be provided at no cost with all the appropriate and necessary personal protective equipment (e.g. gloves, eye protection, hearing protection, respiratory protection) to effectively prevent unsafe exposure (e.g. inhalation or contact with solvent vapors, noise, dust) to health and safety hazards, including medical waste.
Finding Details	Aprons are not provided for workers in the marking, numbering, and cutting sections. To protect their clothes from fabric dust, these workers had wrapped fabric around their waists.
Recommendation for Immediate Action	Provide aprons for workers in marking, numbering, and cutting sections.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.8
Benchmark Details	Workers shall be provided with training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers. Management will ensure use of PPE as necessary.

Finding Details	1. Electrician and machine maintenance workers were not wearing safety shoes provided. 2. Factory does not have a training calendar. In past 12 months training on PPE was provided for 51 workers from washing , embroidery, stain removing, over lock machine operators and for workers from cutting sections. Workers from fusing, waste water treatment plant, maintenance were not included. There is no defined plan to train all workers who need to use PPEs.
Recommendation for Immediate Action	1. Ensure electricians and machine maintenance workers use safety shoes at work. 2. Ensure training on PPE is provided to workers from all departments based on nature of job that they do.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
Benchmark ID	HSE.14.2
Benchmark Details	Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use.
Finding Details	Factory does not provide safety training to persons with high risk responsibilities like electricians and maintenance workers.
Recommendation for Immediate Action	Provide trainings to workers working with high risk responsibilities, such as electricians and maintenance workers.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b)
Benchmark ID	HSE.17.1
Benchmark Details	Workstations, including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains.

Finding Details	1. Workers with standing jobs in the cutting, embroidery, checking, and packing departments lack sitting areas and anti-fatigue mats. 2. Approximately 30% of sewing machine operators do not have access to sitting arrangements with backrests and use hard stools without back support. 3. Workers performing handwork, such as attaching beads to fabric panels, sit on the floor with their body weight on folded legs, which could lead to bodily injury.
Recommendation for Immediate Action	1. Provide sitting areas and anti-fatigue mats for workers with standing jobs in the cutting, embroidery, checking, and packing departments. 2. Provide seating with backrests for all sewing machine operators. 3. Provide appropriate seating arrangements for workers performing handwork to prevent them from sitting on the hard floor.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 44 (1) and Factories Act, 1948-Section 7A (2b)

Hours Of Work (HOW)

Benchmark ID	HOW.9.2
Benchmark Details	Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances sufficiently in advance to allow workers to make alternative plans.
Finding Details	Overtime requirements are communicated 2 hours before the start of overtime, rather than at the beginning of the workers' shifts.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HOW.21

Benchmark Details	Other than in exceptional circumstances, the total weekly work hours (regular work hours plus overtime including any alternative shifts such as 4x4 or 3x3) shall not exceed 60 hours per week.
Finding Details	A review of time records from August 2023, January 2024, and June 2024 revealed that 4 out of 45 sampled workers exceeded 60 hours a week. Specifically, 2 workers from the finishing section worked 60.5 and 63.5 hours, while 2 workers from the cutting section worked 65.5 and 66.5 hours per week during two weeks in January 2024. The remaining 41 sampled workers worked within the 60-hour limit.
Recommendation for Immediate Action	Ensure workers do not work beyond 60 hours a week.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 64 (4)(iii)
Benchmark ID	HOW.2
Benchmark Details	Workers shall be entitled to at least 24 consecutive hours of rest in every seven- day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following.
Finding Details	A review of time records from August 2023, January 2024, and June 2024 revealed that 2 out of 45 sampled workers worked on one rest day in January 2024, resulting in 13 consecutive days of work.
Recommendation for Immediate Action	Ensure workers are provided a day of rest in seven day period.
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 52

