



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: The s. Oliver Group

COUNTRY: India

ASSESSMENT DATE: 12/11/17

ASSESSOR: Insync Global

PRODUCTS: Apparel

NUMBER OF WORKERS: 506

Summary of Code Violations

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.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Clause #4 in the appointment letter states that workers are hired on a training period prior to allowing them on commercial production. However, the information on the training in the letter is left blank and not defined. The letter also states that there is a written document that states that permanent employment is based on performance. However, there is no written communication. ER.1
2. The employment documents for outsourced workers, mainly security and catering service providers, do not define employment terms aside from wages payable per month. ER.1
The appointment letter is in English and not in the local language (Tamil) and is not signed by employee as acceptance of terms of employment. ER.1
The management team's responsibility to manage all employment functions is not defined. ER.1
3. New workers undergo performance evaluations after their first six months and then incremental evaluations are provided in the future. After this first review, evaluations for efficiency and job performance are conducted annually. HR functions like discipline, teamwork, leadership skills are not discussed. ER.1, ER.28, ER.29, ER.30
4. Increments are communicated to the HR team via email and HR then provides the increments accordingly. The factory does not issue a letter to workers communicating the increments and wage revisions. The revised amounts are recorded on the service records on personnel files and signed by workers. ER.1

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.28, ER.29, and ER.30)

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 1.1 Factory management has revised the Appointment order format and circulate the same to all the employees.
- 1.2. Factory management has provided general employment contract to the Canteen workers, It will be also following in future while recruiting the Canteen employee for detailed work instructions and terms in the appointment order Security Guards are sourced from a Security Services agency where the appointment order is given to all with general legally required terms; but factory management provided suggestions to the agency to include all the employment instruction to be mentioned in the appointment order very clearly.

1.3 Factory management provides the appointment order is following only in the Local Language (Tamil).

1.4 Factory has defined the management team's responsibility to manage all employment functions.

1.5 Factory management provided behavioural skills of the workers along with the performance assessment form.

1.6 Factory management informed employees on the day of Increment and wage revision during the same is recorded in the service records of a personnel files

FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Clause # 7 in the agreement with the security service provider states that "Security Guards should not continue the next shift. If any reliever did not come to next shift, the previous shift's security guard must be there on next shift too. The company cannot pay for workers who continued to the next shift." The first statement contradicts the second which allows guards to work two consecutive shifts (16 hours per day). According to the last statement, the factory does not pay for additional work beyond one shift. FLA code on age requirement, Freedom of Association and working hours is not included in the signed agreement. ER.1
2. The factory management states that unskilled workers are hired on a permanent basis and are trained for a minimum of six months. After this six months, management conducts an evaluation and revises wages. However, the documents that reflect increment data refer to these workers as being in a "probationary period." C.3

Local Law or Code Requirement

Industrial Employment Standing Orders Rules 1946; FLA Workplace Code (Compensation Benchmark C.3; Employment Relationship Benchmark ER.1)

Recommendations for Immediate Action

1. Remove inappropriate clauses from security service provider's contracts and ensure that security workers are paid in case they are needed to work beyond their shift.
2. The probationary period for a probationer should not exceed three months, as per the legal definition.

COMPANY ACTION PLANS

Action Plan no 1.

Description

2.1 Factory management has informed the security agency to ensure that any Security guards should not work continuous shifts; and to provide the reliever on time.

2.2 Factory management hired all employees on a permanent basis and all of their wages are paid as per the Local Law. There is no violation of any wage differences for newly joined employee; however the workers who joined as fresh/unskilled will be given minimum wages as per legal guidelines and after 6 Months of period their performance will be analysed and wages will be fixed

above the Minimum Wages.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The factory does not provide trainings to workers or supervisors on Recruitment, Hiring & Personnel Development, Freedom of Association & Industrial Relations, or Grievance Systems. ER.15, ER.17

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.15 and ER.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Factory Management has provided training to all the associates including the supervisors on the recruitment practices, Freedom of association & IR and Grievance systems

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. The factory does not have a written policy on Recruitment, Hiring, or Personnel Development. The factory also lacks a written policy on performance reviews that includes steps and processes, demonstrates linkages to job grading, prohibits discrimination, provides written feedback, and complies with legal requirements. The security manual provides some information on recruitment procedures; such as defining the advertising for job vacancies, the interview process, and the age above which workers will be hired. There is no information on the requirements and the conditions for hiring local or migrant workers or on the use of outsourced services, such as security guards. The procedures do not define the requirements of providing employment contracts, providing a list of employment documents that must be maintained, a list of acceptable proof of age documents, filing of employment documents, workers' access to employment documents, periodic review, and updating information. ER.1, ER.28, ER.29, ER.30

2. The factory does not have written procedures for Freedom of Association or Industrial Relations, such as the formation of a worker committee or the committee's responsibilities. Additionally, there are no written policies on Grievance Systems, Workplace Conduct & Discipline, or Health & Safety. ER.1, ER.25, ER.27

3. A management representative has not signed the policies on Hours of Work, Freedom of Association, Workplace Conduct & Discipline, or Compensation. The policy on Freedom of Association and the Grievance System procedure are not dated. ER.1, ER.23, ER.25, ER.27

4. The document on working hours cites legal requirements and not the factory's own policy on working hours. ER.1, ER.23

5. There are no written procedures on hours of work. Workers are provided with a card which needs to be punched during entry and exit from work areas. There are no procedures for the steps if a worker forgets the card or if the card is damaged or lost. ER.1, ER.23

6. The Assistant HR Manager has signed the policies that have been signed. Senior management has not signed these policies and the Assistant HR Manager no longer works for the factory. ER.1

7. There is no review period defined for the policies and procedures for any of the employment functions. There is no evidence that written policies and procedures are reviewed and updated periodically. ER.1, ER.23, ER.25, ER.27

8. The Policy on Termination includes an irrelevant statement on the termination process: "To have security for personnel and materials of our organization, an endeavour has been made through this policy and procedures to ensure the same and to avoid the threat to the industry from the trespass of persons." There is no policy on Retrenchment. There is a written procedure that defines the exit process for workers but there are no procedures for termination. The termination policy also implies that workers should always resign, regardless of the reason for termination. Clause # 1 states that, as a first step, workers should tender a dated resignation letter to the department

head. The methods for calculating final payouts are in accordance with legal requirements. ER.1, ER.19, ER.32

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.19, ER. 23, ER.25, ER.27, ER.28, ER.29, ER.30, ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

4.1 Factory has developed related written policy on Recruitment, Hiring, or Personnel Development.

Action Plan no 2.

Description

4.2 Factory has started the procedure for developing policy on Freedom of Association & Grievance policy & procedure. It has been drafted & it is under management review, will be implemented once approved.

Action Plan no 3.

Description

4.3 All policies All the policies are signed with the Senior Management representative of the factory

Action Plan no 4.

Description

4.4 Factory has restructured working Hours Policy and updated as per the legally required practice

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. Dormitory residents have a daily meal cost of INR 65 (1.03USD) deducted from their wages regardless of the number of days that they actually eat in the canteen. Workers state that they may be present at work but do not eat in the canteen due to religious or personal reasons. However, the daily meal cost is still deducted. On weekends, workers often leave the dormitories to go into town or visit relatives and do not eat lunch in the canteen. However, the daily meal cost is still deducted. The factory management states that workers still eat in the canteen, even if they leave the dormitories. Worker interviews show that workers do not always eat in the canteen when they leave the dormitories. C.11

2. The factory does not obtain written consent for meal or education loan deductions. C.11

3. There are delays in paying final wages to workers who have resigned. Out of the seven workers who resigned on January 31, 2017, five were not paid until February 10, 2017 (after 10 days). Additionally, two workers who resigned on November 1, 2017 were not paid until December 6, 2017 (after 35 days). According to legal requirements, wages for days worked and unused leave should be paid within 48 hours of date of termination and all other dues must be paid within 30 days. C.1

4. Management stated that workers do not work more than two hours of overtime on any weekdays and they do not work on rest days. Time records do not reflect these statements. Worker interviews revealed that workers have worked more than two hours of overtime on weekdays and that they have worked on rest days. The workers stated that they are compensated at premium rates for this work.

Rework and quality checking records had work entries on November 5, 2017, which was a rest day. However, the worker time cards noted on the production records showed no work on November 5, 2017. Management denied any overtime work beyond two hours per day or on rest days and, therefore, there were no compensation records for these days. C.5, C.6, C.7, C.15, C.16

Local Law or Code Requirement

Industrial Employment (Standing Orders) Act, 1946 Section 23; Factories Act 19948 (Leaves); FLA Workplace Code (Compensation Benchmarks C.1, C.4, C.5, C.6, C.7, C.11, C.12, C.15, and C.16; Employment Relationship Benchmark ER.18)

FLA's Recommendations for Sustainable Improvements

1. Only deduct meal costs from wages when workers actually use the canteen.
2. Obtain written consent from workers for meal and education loan deductions from wages.
3. Pay terminal dues within the legally defined timelines.
4. Ensure that all pay records for all hours worked and work done on rest days are made available for review.

COMPANY ACTION PLANS

Action Plan no 1.

Description

5.1 Factory has policy where the subsidize meal procedure is written clearly. As there is no attendance for each meal, it is difficult to maintain who missed spontaneous meal. Besides the meal is highly subsidized by the factory.

5.2 Factory has clearly written the the meal and education provision in the appointment letter which is signed by the workers.

5.3 Factory has paid all final payment who resigned from the factory as mentioned.

5.4 Factory is maintaining all the time records properly As in the findings, it was a clerical error made by the employee that wrongly she entered a date as 05.11.2017 (Sunday) instead of 05.12.2017 (Tuesday); However the Order no 64.824.32.5319 (S.Oliver) production (Sewing) started on 30.11.2017 only. Attached the production records for the same for more clarifications

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. According to available time records, the working hours are within 60 hours per week. However, in the absence of complete and accurate information, actual working hours could not be verified as time records are inaccurate and incomplete: a) Management interviews and payroll record review show that Sunday is the declared rest day for all workers. However, the sewing floor records on Sunday November 5, 2017 had worker names written in pencil. The worker time cards reflect a day off on that day. The time records of the quality in charge who signed quality check report on November 5, 2017 reflects that she was not at work on that day. Management stated that at times the section in charge records dates in advance on the records. b.) Packing in charge had sent emails on Sunday October 15, 2017 with a packing list. Management stated that garments are packed every day and a consolidated report is made by the packing in charge and sent to the head office. The factory management could not provide a satisfactory explanation as to why an email was sent on a rest day. The assessor requested information on daily packing details and the factory management stated that they send these documents to the head office and the factory does not keep them. HOW.1.3, ER.2
2. Unused annual leave is paid off in January and is not carried over into the next year. Therefore, workers often have no leave available at the beginning of the year. Should they need to take any leave, they have their wages deducted accordingly. Legally, up to 30 days of unused leave can be carried forward into the following year. The practice the factory follows discourages workers from using leave as they get additional money every year. ER.22, HOW.11
3. The factory does not have a system to identify pregnant and lactating women. HOW.5

Local Law or Code Requirement

Factories Act 1948 – Records and Registers; FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER.22; Hours of Work Benchmarks HOW.1.3, HOW.5, and HOW.11)

Recommendations for Immediate Action

1. Maintain accurate and complete information on hours of work on time cards and be transparent in sharing complete information on working hours with assessors.
2. Ensure that unused leave is carried over into the following year, as legally required. Discourage the practice of paying 100% of annual leave and encourage workers to use their annual leave.
3. Establish a system to identify pregnant and lactating workers.

COMPANY ACTION PLANS

Action Plan no 1.

Description

6.1 Factory Management is maintaining all the time records properly now, It was a clerical error made by the employee that wrongly entered a date as 05.11.2017 (Sunday) instead of 05.12.2017 (Tuesday).

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. There are written procedures on workplace conduct and discipline, however, the clauses are not very clear or complete. For instance, clause 3.1 states that "procedures that would be taken for any misconduct as defined in the Standing Orders" (which is a manual on employee – employer relation). Clause 3.1.1 to 3.1.5 defines the step for serving a charge sheet, inquiry and recording the proceedings. Clause 3.1.6 again states that management would take action and clause 3.1.7 starts with provision for oral warning and until 3.1.11 which defines type of disciplinary action that would be taken like (i) Warning (ii) Action as per Payment of Wages Act 1936 (there is no reference to type of action under the Act) (iii) Demotion in rank /post (iv) Stoppage of increment (v) Discharge with one month notice. Clause 3.1.12 defines steps that continue post clause 3.1.5 and clause 3.1.13 states workers may be suspended. The procedures are not streamlined to follow one after the other and do not define the steps for documenting verbal warnings or the worker appeal process. The Standing Orders (a manual on employer and employee relationships) do provide some information on workplace rules, such as the types of misconduct but it does not define the actions that will be taken for each type of misconduct. The HR team has copies of the Standing Orders. ER.27

2. The Committee for the Prevention of Harassment is not formed according to legal guidelines. a.) The Committee's name has not been changed to "Internal Complaints Committee". b.) The Presiding Officer is not designated specifically and meetings are conducted by the Factory Welfare Officer who only has two years of experience instead of a company senior employee. c.) The NGO Representative does not sign the attendance sheet but does sign the meeting minutes. Awareness is provided to committee members on harassment and prevention. However, workers and supervisors do not undergo any formal training on harassment in the workplace or on the existence of the Committee and their responsibilities. Also, the penal consequences for harassment in the workplace is not posted as legally required. H/A.1

Local Law or Code Requirement

The Sexual Harassment of Women at Workplace (Prevention, Prohibition, Redressal) Act 2013; FLA Workplace Code (Employment Relationship Benchmark ER.27; Harassment or Abuse Benchmark H/A.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Factory have developed & implemented policy & procedure for work place conduct and Discipline.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. Although the grievance procedures define the steps for reporting grievances in writing to a supervisor and to the Production Manager, there are no defined steps for verbally reporting grievances. Moreover, there are no procedures defined on how to use the suggestion boxes and on how to document the grievances. ER.25.3
2. There are logs that track the reported grievances with the name of the responsible person and the completion date, but information on action taken is not recorded. ER.25.3
3. The grievances received through the suggestion boxes are documented in a register but the original slips on which workers submit their grievances are not filed. This could be a risk for ignoring grievances reported. ER.25.3
4. The suggestion boxes are placed in full view of all workers, which is a risk of them not being completely confidential. ER.25.3

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25.3)

COMPANY ACTION PLANS

Action Plan no 1.

Description

8.1 Factory management is still working on the policy & procedure for verbally reporting grievances. Factory has the policy & procedure implemented for suggestion boxes.

Action Plan no 2.

Description

8.2 Factory is implementing a new format for Suggestion Box - grievance tracking log.

8.3 Factory has established a separate file for Grievance records which received from Suggestion Box; But it was not filed along with the tracking Log. But the new format has such provision of filing the letter of grievance along with the log book.

8.4 Currently factory has provided 2 suggestion boxes in the factory; both are placed in the male and female toilets separately which is very confidentially maintained; 1 more suggestion box is placed in the dining hall for Hostellers

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory does not have written procedures for managing its environmental impact to its surroundings, procedures that enable workers to raise environmental concerns, procedures for reporting environmental emergencies, procedures include protections for workers who allege environmental violations. ER.31
2. The environmental protection training has been conducted for 518 out of 586 workers. Management states that the remaining workers will be trained in the next three months. ER.15
3. The environmental protection training has been conducted for eight out of 40 supervisors. Management states that the remaining supervisors will be trained in the next six months. ER.17
4. The factory has an emergency response team but it is not trained specifically for gas leaks. ER.17

COMPANY ACTION PLANS

Action Plan no 1.

Description

9.1 Factory has developed written procedures for environmental concerns.

Action Plan no 2.

Description

9.2 & 9.3 Factory has provided environment training in 2 months periodically; Every worker is trained on Environment during their Induction Training.

Action Plan no 3.

Description

9.4. Factory has started it, The ERT training module has been added with Emergency procedures for GAS LEAKS specifically.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not have written procedures for Health, Safety and Environment on the following:

- a. The standard operating procedures for the machinery in the factory;
- b. The measures required to protect the reproductive health of workers through minimizing exposure to workplace hazards;
- c. The steps required for workers to raise health and safety concerns;
- d. Protections against retaliation for workers who raise health and safety concerns;
- e. The steps required to ensure that all personnel, visitors, contractors, and service providers are safely evacuated;
- f. The steps required to ensure that all special categories of workers and children in childcare facilities safely evacuated;
- g. The steps that should be taken to protect workers if there is an accidental chemical spill, including identifying those who are responsible for cleaning the spill, list of confined, list of machinery requiring use of Lock-Out Tag-Out;
- h. Responsibilities of the Personnel Manager and Security Guard is defined but not for responsible persons in the firefighting team. Risk assessment for fire has not been conducted. There are no written procedures on steps for reporting death, injury, illness, and other health and safety issues, factory does not have any guidance documents for external contractors/service providers concerning health and safety. There is no date on an assessment conducted for Health & Safety. Assessment is not a risk assessment but a hazard identification assessment. It does not identify the risks, impacts and control measures.
- i. Workers with maintenance responsibilities do not receive specific training on maintenance safety. ER.31, HSE.12, ND.8

COMPANY ACTION PLANS

Action Plan no 1.

Description

Factory has developed written procedures for Health, safety & environment.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There is no spill response kit near the Diesel Storage area. There are no collection trays under the diesel pumps and stains from diesel leakages were seen on the floor. HSE.9
2. The diesel containers are not labelled for content and hazards. HSE.9
3. The secondary containers for the diesel barrels cannot adequately contain leaks. HSE.9

Local Law or Code Requirement

Factories Act 1948 – Safety; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.9)

Recommendations for Immediate Action

1. Provide a spill response kit near the Diesel Storage area and collection trays under the diesel pumps to contain spills.
2. Post the content and hazard labels on the diesel containers.
3. Provide a secondary containment with adequate capacity to contain leakages from the diesel barrels.

COMPANY ACTION PLANS

Action Plan no 1.

Description

11.1 Factory has provided Diesel storage with Secondary container to stop the leakages of the Diesel.

11.2 Factory has posted label in the Diesel Containers.

11.3 Factory provided Secondary containers to stop the Diesel leakages properly; hence factory use pumbs for tranferring the diesel, so the possibilities of leakages is very low. However factory will provide the bigger container in future.

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The fire brigade does not have the appropriate equipment to fight fires, such as the correct PPE. HSE.6
2. The factory does not have a response plan in the event of a fire in their written procedures. The factory stated that the factory does have a plan, but it is not included in the written procedures. HSE.5

Local Law or Code Requirement

FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.5 and HSE.6)

Recommendations for Immediate Action

1. Provide breathing apparatus to the fire brigade.

COMPANY ACTION PLANS

Action Plan no 1.

Description

12.1 Factory is planning and it is under discussion with management.

Action Plan no 2.

Description

12.2 Factory has included the Emergency preparedness plan in a written procedure.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The boiler area is covered with a roofing sheet that has asbestos and there is no appropriate signage. HSE.1
2. The safety instructions for the cutting machine, the boiler, or the power generator are not displayed near these machines. The safety instructions are displayed in the sewing section. HSE.14
3. The needle guards installed on the sewing machines are too low and workers have pushed them up so high that they are ineffective. HSE.14
4. The factory management does not provide rest areas or anti-fatigue mats to workers with standing jobs. HSE.17
5. The traffic lanes inside the factory are not marked to enforce safe driving practices. HSE.1
6. The lightning protection system is not installed in the factory. HSE.1
7. The confined spaces are not marked to warn workers. HSE.1
8. The factory does not implement a lockout-tagout program by locking out equipment when needed. HSE.1
9. The factory does not provide helmets to workers who work at high elevations in the fabric storage area or for the maintenance of electrical installations. HSE.1
10. The device to lock the wheels of the stand ladder did not work during testing and the ladder could be moved when the wheels were locked. HSE.1
11. The electrician is provided with leather gloves instead of rubber gloves. HSE.8
12. Hand drying facilities are not provided in the bathrooms. HSE.20
13. The dormitories do not have beds or lockers. The workers place bedsheets and plastic mats on the ground and sleep on the floor and store their belongings on open racks. HSE.25
14. The medical room in the factory does not comply with the following legal requirements: a.) There is no ambulance. b.) There is no full time doctor available. The doctor visits once a week for an hour or two. c.) The medical room does not have chairs for the nurse or for the doctor. d.) There is no stock of medicines or an oxygen cylinder. e.) There is one examination bed but no rest beds for males and females. HSE.18
15. The water storage tank platform structure near the boiler is tilted to one side and is at risk of collapsing due to the weight of the water tank. HSE.1
16. The cooks were seen using cloth aprons which may not provide adequate protection from accidental spills of hot oil or water. The washers were also seen using cloth aprons which may not prevent water from soiling their clothes. If wet aprons stick to workers' clothing for long periods of time, there are risks of infection. The factory does not have appropriate arrangements for washers to protect

their feet from exposure to water or for cooks to prevent spills from hot oils and water. For example, cooks were seen using thin disposable serving gloves while holding hot metal stirrers, which might not prevent burn injuries. HSE.19

17. Insect repellents are not provided in the cooking and the dining areas. HSE.19

Local Law or Code Requirement

Factories Act 1948 - Safety and Welfare; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.8, HSE.14, HSE.17, HSE.18, HSE.19, HSE.20 and HSE.25)

Recommendations for Immediate Action

1. Replace the asbestos sheets used in the roof above the boiler area. Post a sign indicating the presence of asbestos until the roof sheets are replaced.
2. Post safety instructions near the cutting machine, the boiler, and the power generator.
3. Install the appropriate needle guards on the sewing machines. Train the workers and monitor their usage so that workers do not push the guards up, rendering them ineffective to preventing injuries.
4. Provide rest areas and anti-fatigue mats for workers with standing jobs.
5. Mark traffic lanes inside the factory for safe driving practices.
6. Install a lightning protection system for factory.
7. Mark all confined spaces to warn workers.
8. Provide and implement a lockout-tagout program by locking out equipment when needed.
9. Provide helmets to the workers who work at high elevations climb heights in fabric storage areas and maintenance workers who climb heights for maintenance of electrical installations.
10. Repair or replace the locking device on the wheels of the stand ladder to ensure that the ladder does not move when the wheels are locked.
11. Provide the electricians with rubber gloves instead of leather gloves.
12. Install hand drying facilities in the bathrooms.
13. Install beds and lockers in the dormitories used by workers.
14. Ensure that the medical room has all legally requirement resources and equipment.
15. Repair the water storage tank platform structure near the boiler so that it is not at risk of collapsing.
16. Provide appropriate hand gloves, aprons, and covered footwear to cooks and canteen workers.
17. Install insect repellents in cooking and dining areas.

COMPANY ACTION PLANS

Action Plan no 1.

Description

13.1 Factory will replace the roof by the fire-proof shed; meantime Danger Singboard has been displayed.

Action Plan no 2.

Description

13.2 The safety Instructions for all types of works has been displayed in cutting machines, boiler and generator by the factory management.

13.3 Factory has provided appropriate needle guards to all the sewing machines.

13.4 Factory has provided floor mat to all the workers including the standing jobs even though all the workers are wearing their Shoes.

Action Plan no 3.

Description

13.5 It is in planned and under discussion with management

Action Plan no 4.

Description

13.6 Factory has installed lightning protection in the highest signal tower which is located in inside of the factory campus 13.7 There is no confined space in the workplace except the network cable junction which will be around 1.5 ft under the floor; the same has been highlighted with zebra marking (red and yellow).

Action Plan no 5.

Description

13.8 Factory has planned and it is under discussion.

Action Plan no 6.

Description

13.9 factory has provided helmets to the workers who work at heights.

13.10 Factory has provided the locking device in the Ladder properly.

13.11 Factory has provided the Rubber Gloves to electricians.

Action Plan no 7.

Description

13.12 Factory has planned and it is under discussion with the management 13.13 Factory has planned and it is under discussion with the management

Action Plan no 8.

Description

13.15 Factory has restructured water storage tank platform.

13.16 Factory has provided appropriate hand gloves, aprons which is heat and soak resistant .

13.17 factory had installed earlier insect repellents which has some problem with functioning; now factory management has repaired and installed effectively which is functional