



Verification Assessment

COMPANIES: alphabroder
COUNTRY: Bangladesh
ASSESSMENT DATE: 07/22/17
ASSESSOR: Insync Global
PRODUCTS: Apparel
NUMBER OF WORKERS:

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.

Previous Report Findings and Verification Results

PREVIOUS FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

The factory does not have written policies for the following Employment Functions: Recruitment, Hiring, & Personnel Development, Workplace Conduct & Discipline, Grievance System, and Environmental Protection. [ER.25, ER.27, ER.28, ER.29, ER.30, ER.31]

The factory does not have complete procedures for the following employment functions: Personnel Development, Workplace Conduct & Discipline, Environmental Protection, and Health & Safety. [ER.27, ER.28, ER.29, ER.30, ER.31]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.25, ER.27, ER.28, ER.29, ER.30, and ER.31; Health, Safety & Environment Benchmark HSE.1)

VERIFICATION RESULT

Finding Status

Partially Remediated

Remediation Details

1. Finding Status: Partially Remediated

Explanation:

Factory has written policies on Recruitment & Hiring but not on Personnel Development (including performance reviews). There is a written policy on Workplace Conduct & Discipline. There are no written policies on the Grievance System or Environmental Protection. [ER.25, ER.31]

Root Causes:

There is a lack of understanding of the term Personnel Development and difference between policy and procedures. There is a lack of initiative of management in having written policies.

2. Finding Status: Partially Remediated

Explanation:

There is no written procedure for Personnel Development, Environmental Protection, or Health & Safety except for fire safety. There are some written procedures for Workplace Conduct & Discipline. [ER.28, ER.29, ER.30, ER.31]

Root Causes:

There is a lack of awareness and guidance by the brands on the requirement to have written procedures.

Local Law or Code Requirement

FLA Workplace Benchmark (Employment Relationship Benchmark ER.1.1, ER.25, ER.28, ER.29, ER.30, and ER.31)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will make Personnel Development Policy, Policy on grievance system and Policy for Environmental Protection very soon.
2. We will make Personnel Development Procedure very soon.

PREVIOUS FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

The factory does not provide orientation training to new employees. [ER.15]

The factory does not provide specific training to the relevant supervisors on the following Employment Functions: Recruitment, Hiring & Personnel Development, Hours of Work, Termination & Retrenchment, Industrial Relations & Freedom of

Association, Workplace Conduct & Discipline, Grievance System, and Environmental Protection. [ER.17]

The factory does not provide ongoing training for employees on the following Employment Functions: Recruitment, Hiring, & Personnel Development, Wages & Benefits, Hours of Work, Termination & Retrenchment, Industrial Relations & Freedom of Association, Workplace Conduct & Discipline, Environmental Protection, and Health & Safety. [ER.1]

The factory does not provide training on Workplace Conduct for relevant HR staff. [ER.27]

Although a training calendar exists, there is no system to track employee attendance at the trainings or the topics that are covered. Based on request, the Production Manager allows only 15 to 20 workers to attend the training programs. [ER.1]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, and ER.27)

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Partially Remediated Explanation:

Orientation programs are conducted once a month for all workers hired during the month. Content of notification for orientation program is similar in all months. A day prior to the date for orientation program, a notice is posted every month which provides the date, time and day and venue for the program. The time and day for all months states "Saturday 28, 12:00" irrespective of the date. For example, May 28, 2017 was a Sunday and not Saturday; April 28 was a Thursday and not Saturday; and March 28, 2017 was Tuesday and not Saturday. Furthermore, orientation does not include Industrial Relations or Workplace Conduct & Discipline. [ER.15]

Root Causes:

There is a lack of monitoring.

2. Finding Status: Not Remediated Explanation:

Training has not been conducted for supervisors on any Employment Functions. [ER.17]

Root Causes:

Lack of commitment by management.

3. Finding Status: Partially Remediated

Explanation:

In the past six months, training has been provided to some workers. 80 out of 814 workers (9.82%) have been trained on Workplace Conduct & Discipline, 50 (6.14%) have been trained on Recruitment & Hiring, 66 (8.18%) have been trained on Termination, 91 (11.17%) have been trained on Environmental Protection, 90 (11.05%) have been trained on Industrial Relations, and 161 (19.77%) have been trained on Health & Safety. [ER.1, ER.15]

Root Causes:

There is no training calendar or a formally defined plan to conduct trainings.

4. Finding Status: Not Remediated Explanation:

Training has not been conducted for HR staff on Workplace Conduct and Discipline. [ER.27]

Root Causes:

There is a lack of commitment from management.

5. Finding Status: Partially Remediated

Explanation:

The factory has not prepared a training calendar. The factory does have a plan for trainings; however, there is no procedure to execute the plan. Trainings are conducted in an unplanned manner; there is no system in place to ensure 100% of workers are trained. The factory does maintain records on training topics and attendees. [ER.1]

Root Causes:

There is a lack of commitment by management to ensure training is conducted for 100% of workers.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.2, ER.15, ER.17, and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will be careful about to track Date, Day & Time accurately.
2. Training for Supervisor will be conducted soon under new plan and schedule.
3. We are going to make training calendar to conduct trainings.
4. There are a few Academy / Authorities who provides this sort of training. We are going to find out their schedules for this Subject. So, we can do this as per trainer's schedule.

5. Effective Training calendar will be prepared to provide all workers training by next 2 weeks.

PREVIOUS FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

The factory does not communicate the policies and procedures and their updates for the following Employment Functions to the general workforce: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Environmental Protection, and Health & Safety. [ER.16, ER.25, ER.27, ER.28, ER.30, ER.32]

The factory does not provide workers with a copy of the workplace rules during orientation. [ER.15]

The factory only communicates factory policies at the time of issuing the appointment letters for new hires. The signatures on the documents should be obtained right after the issuance of the appointment letters and the communication of the policies and procedures. However, new recruited workers are called on a later date than at the time of issuing the appointment letter when pictures are taken to sign the appointment letters and documents serving as evidence and documentation of the communication of the policies and formalized procedures. [ER.1]

The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes. [ER.16]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.16, ER.25, ER.28, ER.29, ER.30, and ER.32)

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Partially Remediated

Explanation:

The factory has communicated its policies and procedures to some workers during training programs as aforementioned in Finding. No.2 [ER.16, ER.25, ER.27, ER.28, ER.30, ER.32]

Root Causes:

There is a lack of commitment by management.

2. Finding Status: Remediated Explanation:

Workplace rules is included in the hand book provided to workers.

3. Finding Status: Partially Remediated

Explanation:

Based on interview with management and workers, employment contract is issued two to three days after hiring instead of issuing the letter on day of hiring. Policies and procedures are communicated verbally. Formal training program is conducted at the end of each month for new hires. [ER.1]

Root Causes:

Lack of commitment by management in implementing required standards.

4. Finding Status: Not Remediated

Explanation:

The worker integration component is missing across all Employment Functions. Workers are not consulted in decision-making processes. [ER.16]

Root Causes:

Policies and procedures are made by management and hence workers are not involved.

Local Law or Code Requirement

FLA Workplace code (Employment Relationship Benchmarks ER.1, ER.16, ER.17, ER.25, ER.28, ER.30 and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. In future, we will inform all workers.
2. Appointment letter provide same day in hiring.
3. WPC is representing workers. So, we take our decisions involving WPC. If there is any other advice or procedure you have, please provide.

4. We will follow accordingly.

PREVIOUS FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

The factory does not conduct a periodic review and update of policies and procedures for the following employment functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Environmental Protection, and Health & Safety. [ER.1, ER.29, ER.30, ER.31]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.29, ER.30, and ER.31)

VERIFICATION RESULT

Finding Status

Remediated

Remediation Details

All policies were created on January 1, 2017 and are scheduled to be reviewed January 1, 2018.

PREVIOUS FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

The factory does not take measures to protect the reproductive health of its employees through minimizing exposure to workplace hazards. [HSE.12, ND.8]

The factory does not have procedures in place for how workers can raise Health & Safety concerns or for protection against retaliation for workers who raise such concerns. [ER.31]

The factory does not make all legally required health and safety documents available to workers and management. [HSE.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmarks HSE.2 and HSE.12; Nondiscrimination Benchmark ND.8)

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated

Explanation:

The factory does not take measures to protect the reproductive health of its workers through minimizing exposure to workplace hazards. [HSE.12, ND.8]

Root Causes:

The factory does not understand the requirement.

2. Finding Status: Not Remediated

Explanation:

The factory does not have procedures in place for how workers can raise Health & Safety concerns or for protection against retaliation for workers who raise such concerns. [ER.31]

Root Causes:

The factory does not understand the requirement.

3. Finding Status: Remediated Explanation:

Documents are made available. For instance, the drinking water test report is posted near drinking water stations.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmark HSE.12; Nondiscrimination Benchmark ND.8)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Will follow accordingly. 2. Will follow accordingly.

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

The factory does not train an adequate number of workers in all departments on handling fire-fighting equipment. 18% from each department is the minimum percentage of workers that must be trained on handling fire-fighting equipment, according to Bangladesh Labor Law. However, in the Sewing department only 7.41%, in Finishing - 13.09%, in Quality - 15.85%, and in Cutting - 12.76% of workers have been trained. [HSE.6]

The factory has not installed emergency lights above any of the exits to assist in the evacuation process. The factory has installed Compact Fluorescent bulbs (CFL), which are generally used for domestic lighting outside exit doors and have incorrectly marked them as "emergency lights." These bulbs are inadequate as the light emitted cannot penetrate smoke in the case of fire. [HSE.5]

Aisle markings have faded in all departments except in Sewing and Cutting. Evacuation route markings have faded in all work areas except in the Sewing department. [HSE.5]

17 out of 22 illuminated exit signs installed above exits are in English and not in the local language. [HSE.5]

Local Law or Code Requirement

The Factories Rules 1979, Section 52; Bangladesh Labor Rules 2015; Bangladesh Labor Act 2006, Section 62; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.5.1 and HSE.6.2)

Recommendations for Immediate Action

1. Ensure that at least 18% of the workers from each department are trained on handling fire-fighting equipment.
2. Install industrial quality emergency lights above all exits.
3. Re-mark and maintain aisle and evacuation route markings in all departments wherever faded.
4. Ensure that all exit signs are in the local language.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Partially Remediated

Explanation:

Currently, the percentage of workers trained on firefighting in each section is: Sewing 16%, Quality 24%, Cutting 27%, and Finishing 22%. [HSE.6.2]

Root Causes:

Lack of having a planned training calendar and monitoring to ensure compliance with legal requirement.

2. Finding Status: Remediated Explanation:

The factory has installed industrial-level emergency lights are above all exits.

3. Finding Status: Remediated Explanation:

Aisle and evacuation routes have been remarked and are prominently visible.

4. Finding Status: Not Remediated

Explanation:

The word EXIT has been written vertically in local language (Bangla) on right side of the board displaying illuminated exit sign in English. However, the local language cannot be easily read as it is written vertically and not horizontally. [HSE.5]

Root Causes:

Management stated that as per the Accord, exit signage should be fire resistant while fire resistant display boards with writing in Bangla is not available in Bangladesh. However, based on information gathered from external sources, there is no such requirement from Accord.

Local Law or Code Requirement

The Factories Rules 1979, Section 52; Bangladesh Labor Rules 2015; Bangladesh Labor Act 2006, Section 62; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.5.1 and HSE.6.2)

Recommendations for Immediate Action

1. Train at least 18% of workers in the sewing section on firefighting.

2. Post an adequate exit sign in the local language (Bangla) that is horizontal and can easily be read.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We are going to make plan to solve this problem. So, need time to fix a procedure.
2. We must customize this EXIT board as per advice.

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

Although the factory obtained a Building Stability Certificate in Oct 2013 from the BGMEA (Bangladesh Garment Manufacturers & Exporters Association), the building stability certificate was not verified by government authorities and accepted as a valid certificate as required by local law. [HSE.4]

None of the first aid boxes are marked with a red cross over a white background. [HSE.6]

Space between workstations in 40% of the Sewing section is congested due to the deployment of in-line helpers and control checkers who ensure that stitches are accurately in line and correct any defects found. These workers stand opposite to the the sewing operators, posing a risk for safe and quick evacuation in an emergency. [HSE.5]

The factory has not provided a canteen facility and subsidized food rates as required by local law for factories that exceed over 250 workers. It has only provided a dining area for workers to eat, which does not have a kitchen or pantry, and the factory does not provide subsidized snacks and beverages during breaks. [HSE.1]

Local Law or Code Requirement

Building Ordinance 123; Building Administration Regulations, Regulation 18; Factories Rule 1979, Rule 55 and 57(4); Bangladesh Labor Code 2006, Section 56; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.1, HSE.4, HSE.5, and HSE.6)

Recommendations for Immediate Action

1. Apply for and obtain the stability certificate from the appropriate local government authorities.
2. Mark first aid boxes with a red cross on a white background as per legal guidelines.
3. Maintain adequate space between work stations to allow quick and easy access during emergency evacuations.

4. Provide a canteen facility as required by law and ensure that food and snacks are made available at sub-sized rates.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated

Explanation:

The factory does not have stability certificate approved by local government authorities. The certificate from 2013 that was issued by BGMEA is available. As per the corrective action plan, the factory applied for stability certificate from government authorities; however, there was no evidence available to support the factory's claim for application. The interviewed management confirmed that they had not applied yet. "Accord" conducted a Structural Safety inspection in April 2017 and recommended strengthening of column (Pillars) to bear the load on each floor. [HSE.4]

Root Causes:

Lack of monitoring and following up on implementation of corrective action.

2. Finding Status: Partially Remediated

Explanation:

First aid boxes have been marked with a red cross on white background except in cutting where the marking is a white cross on green background. [HSE.6]

Root Causes:

There is a lack of monitoring.

3. Finding Status: Not Remediated

Explanation:

The work stations in sewing sections are very congested. There is inadequate space in the work stations. In most workstations, workers are sitting back-to-back, chairs touching each other, leaving no space for chairs to be pushed back and for workers to exit their work stations. Some workers' access to passages is blocked by bins containing garments. At two work stations, workers are completely blocked by a pillar behind them and tables on either side. On the other side are long garment storing tables. [HSE.5]

Root Causes:

Lack of training and monitoring for supervisors and workers. Lack of commitment from management to ensure fire safety standards.

4. Finding Status: Partially Remediated

Explanation:

Dry snacks are now available on sale and workers' pay directly. Price of items being sold is not posted, as legally required. [HSE.1, HSE.19]

Root Causes:

Management does not monitor the requirements.

Local Law or Code Requirement

Building Ordinance 123; Building Administration Regulations, Regulation 18; Factories Rule 1979, Rule 55 and 57(4); Bangladesh Labor Code 2006, Section 56; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.4, HSE.5, HSE.6, and HSE.19)

Recommendations for Immediate Action

1. Apply for and obtain the stability certificate from the appropriate local government authorities.
2. Mark first aid box in cutting section with a red cross on a white background, as per legal guidelines.
3. Maintain adequate space between work stations to allow quick and easy access to escape routes during evacuations.
4. Post the price list of items being sold in the Canteen.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Detail Engineering assessment is approved by ACCORD Civil Engineering Team. Meantime, remediation work is completed almost 75%. So, Completion of this remediation will proof Factory Stability.
2. We will customize all the First Aid box colors as per advice.
3. We will change our machine Layout to avoid blocking. 4. Only one item was there without price, now it is listed.

PREVIOUS FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

The factory does not segregate solid waste that it generates, including non-functional electric tube-lights (which contain mercury), paper waste, wood waste, sanitary waste, and plastic waste. Furthermore, it does not store this waste in closed containers prior to disposal. [HSE.1]

The factory does not provide spill response kits near the diesel handling areas to contain any possible spillage. [HSE.9]

The factory has not received an inspection on air emission generated from diesel powered generating sets. Additionally, the factory has not obtained the Environmental Clearance certificate, as required by local law. [HSE.4]

Local Law or Code Requirement

The Bangladesh Environment Conservation Act, 1995 Act No. 1 of 1995- section 12; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.4, and HSE.9)

Recommendations for Immediate Action

1. Segregate all waste streams.

2. Label and store solid waste in closed containers to avoid any risk to workers' health.

3. Provide a spill response kit near diesel handling areas.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Remediated

Explanation:

No waste was observed stored in the factory. As stated by management, waste is disposed of once every three hours and hence there is no accumulation.

2. Finding Status: Not Remediated Explanation:

The factory has not provided a spill response kit. [HSE.9]

Root Causes:

Lack of awareness of what a spill response kit is.

3. Finding Status: Remediated

Explanation:

The factory has not obtained the Environment Clearance certificate nor have the government authorities conducted an inspection for air emissions. Management provided a notification from government authorities stating that the Environment Clearance certificate is not required as there is no washing/dyeing process.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmark HSE.9)

Recommendations for Immediate Action

Provide a spill response kit near diesel handling areas.

COMPANY ACTION PLANS

Action Plan no 1.

Description

We will provide.

PREVIOUS FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

The policy on Hiring states that workers have a three-month probation period, which can be extended by another three months if performance is not satisfactory. This policy violates the 3-month limit on probationary period as per FLA Workplace Compliance Benchmarks. [C.3]

The factory does not conduct any formal performance reviews. While job descriptions for helpers and sewing operators are defined, there are no job descriptions for any supervisors at the factory and workers from the Packing department. [ER.29]

The factory's service rules are not approved by the factory inspector as the relevant local governmental authority, as required by law. [ER.2]

Review of employment records for three sampled workers revealed that these workers were promoted from sewing assistants to sewing operators and then from sewing operators to supervisors. However, the factory did not maintain any performance review details that explain the basis for these promotions. The factory does not inform workers in writing about the promotions, change in designation, and increase in wages. In this case, the factory verbally informed workers about the change in designation and asked them to return their old identity cards and replaced these cards with new ones reflecting the new designations. The factory did not revise these workers' job descriptions based on the change in responsibilities. [ER.29, ER.30]

Workers are required to obtain an age estimation certificate based on a physical health examination by a doctor. This age estimation form completed by the doctor is kept in the workers' personnel files; however, the form has two invasive and improper questions that violate workers' privacy. The two questions refer to the growth of breasts and pubic hair as input for age verification. It cannot be guaranteed that the health examination is completed in a gender-sensitive manner. In addition, the age verification certificate, including information concerning the two inappropriate questions is publicly accessible for managerial staff and factory visitors, such as local authorities and auditors. [ND.10, ND.11]

Local Law or Code Requirement

Bangladesh Labor Act 2006, Chapter II, Section 3, Subsection 2 and 3; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2.1, ER.29, and ER.30; Nondiscrimination Benchmark ND.10 and ND.11; Compensation Benchmark C.3)

Recommendations for Immediate Action

1. Apply to the relevant government authorities for the approval of the factory service rules.
2. Review and revise the age estimation forms to ensure that they do not violate workers' privacy and remove the two inappropriate questions accordingly. Also, ensure that the physical health examination doesn't cover these areas for age verification purposes.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated

Explanation:

Clause on Probation period states that the period of probation is three months but can be extended another three months if work is not satisfactory. This violates the FLA workplace Code. [C.3]

Root Causes:

Factory management states that the local law allows for an extension of the three-month probation period by three months. Factory policy, however, does not include this three-month extension of probation. Thus far, the probation period has not been extended for any worker.

2. Finding Status: Partially Remediated

Explanation:

Performance reviews are conducted for all workers, except those who assist in the production processes (helpers), when workers submit written requests for promotions. Job descriptions are now available for Supervisors and Packing department workers. [ER.29]

Root Causes:

As stated by management, helpers are not involved in skilled jobs and hence performance evaluations are not conducted.

3. Finding Status: Not Remediated

Explanation:

The factory has obtained government certification (i.e. approval) for the rules; however, it has not received government approval of its procedures, which are listed in handbook. [ER.2]

Root Causes:

Management lacks understanding of the requirements

4. Finding Status: Not Remediated

Explanation:

The factory does not review the performance for all workers except upon request for promotion. Upon receiving a request from workers, Industrial engineering department reviews performance and recommends for promotions and/or wage increases. Results are then reviewed and approved by the production manager. Review results are documented and signed by workers. The factory does not inform workers in writing about promotion, date of promotion, revised designation, or revised wages. Job descriptions are not revised. [ER.29, ER.30]

Root Causes:

There is a lack of understanding of the required documentation.

5. Finding Status: Remediated

Explanation:

Two invasive and improper questions that violate workers' privacy have been removed from the age estimation forms.

Local Law or Code Requirement

Bangladesh Labor Act 2006, Chapter II, Section 3, Subsection 2 and 3; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2.1, ER.29, and ER.30)

Recommendations for Immediate Action

1. Revise clause to ensure probation period does not exceed three months.
2. Conduct performance reviews for helpers.
3. Have service rules and procedures attested by relevant government authorities.
4. Inform workers in writing about promotion, effective date of promotion, revised designation and revised wages and revise job descriptions accordingly.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. This clause comply Local Law though it conflicts FLA workplace Code.
2. We are collecting all hourly production data of all Operators along with Asst those who are operating machines. Without performance verification, it is not possible to pick up them. So, we are bound to do this for our own benefit.
3. We will apply for approval the rules by government authority.
4. We are providing Promotion/Increment Letter that included the required data.

PREVIOUS FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

The factory has not defined procedures for applying for leave and obtaining approvals in the leave policy. [ER.23]

Factory has not defined extraordinary business circumstances and communicated these circumstances to all employees. [HOW.1]

The factory does not identify pregnant/lactating women in order to decrease their maximum hours of work. [HOW .5]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.23; Hours of Work Benchmarks HOW.1 and HOW.5)

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Remediated Explanation:

There are now written procedures on applying for leave and seeking approvals.

2. Finding Status: Not Remediated

Explanation:

Extraordinary business circumstances are not defined and included in the Hours of Work policy and procedures. [HOW .1]

Root Causes:

There is a lack of understanding of "Extraordinary Business Circumstances."

3. Finding Status: Not Remediated

Explanation:

The factory does not identify pregnant or lactating women in order to decrease their maximum hours of work. [HOW .5]

Root Causes:

The factory does not have separate working hours for pregnant or lactating women and hence do not identify such workers.

Local Law or Code Requirement

FLA Workplace Code (Hours of Work Benchmarks HOW.1 and HOW.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

2. We will make procedure.
3. We will make this list immediately and will continue.

PREVIOUS FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

The factory does not update information on leave in the service book of employees as required by law, reflecting the amount of unused leave. [ER.23]

Per practice, all unused earned leaves are paid off with bonus payments during the festival period. Per Bangladesh Laws, 1-day leave is earned for every 18 days worked. As per legal requirements, in case a worker does not take accumulated leave during a period of 12 months, any unused leave is to be added to the leave earned in the next year. Instead of adding this leave to leave of next year, the factory pays off the earned unused leaves instead. Factory management states that this practice is followed to allow for more cash during the festival period since workers request for additional money as loans and advances. The payment is to be calculated based on the last wage made during the last pay period. Therefore, workers tend to lose out on earnings if all leave is paid out, since they would have earned more with wage revisions at later dates. Furthermore, if all leave is paid off, workers have no leave to use. If workers need to take leave, the leave is adjusted against casual leave and in case there is no such leave balance the worker must take leave without payment, which impacts their annual earnings. [ER.22]

The factory has insured all workers under a Group Insurance Scheme as directed by the Bangladesh Garment Manufacturers and Exporters Association. The list of insured workers needs to be updated every two months. However, the factory has not updated the list since April 2015; as a result, 20% of the factory's current workers are not covered under the scheme. [ER.22]

Local Law or Code Requirement

Bangladesh Labour Code 2006, Section 7(2); Bangladesh Labour Act 2006, Section 117(4); Bangladesh Garment Manufacturers and Exporters Association Notification dated May 4, 2015 on Group Insurance Scheme; FLA Workplace Code (Employment Relationship Benchmarks ER.22 and ER.23)

Recommendations for Immediate Action

1. Update service books for workers with all required information.
2. Ensure that unused leave is carried forward to the next year as per legal requirements. Ensure that workers do not lose out on wages if they are paid off their unused leaves. Ensure that workers can take the leaves they're legally entitled to.
3. Update the list of workers covered by the Group Insurance Scheme every two months to ensure that all employees are covered.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated Explanation:

Workers' service books are not updated to reflect their current balance of annual leave. [ER.23]

Root Causes:

There is a lack of commitment by management

2. Finding Status: Partially Remediated

Explanation:

Effective 2016, as per amended rules of 2015, the factory pays workers for 50% of their earned annual leave (10 of the 20 days). The factory maintains records regarding the of payout for 10 days; however, it does not keep a record for workers' balance of annual leave used as leave by workers. [ER.22]

Root Causes:

There is a lack of monitoring by management.

3. Finding Status: Not Remediated

Explanation:

The list of workers was last updated on May 13, 2017 to include 865 out of 934 workers. Hence 7% of workers are not covered by the Group Insurance. [ER.22]

Root Causes:

The factory is in the process of updating the online data and is facing errors with the software and hence were unable to update.

Local Law or Code Requirement

Bangladesh Labour Code 2006, Section 7(2); Bangladesh Labour Act 2006, Section 117(4); Bangladesh Labour Rules Gazette of September 2015, Section 107(2); Bangladesh Garment Manufacturers and Exporters Association Notification dated May 4, 2015 on Group Insurance Scheme; FLA Workplace Code (Employment Relationship Benchmark ER.22.1)

Recommendations for Immediate Action

1. Service should be updated to reflect information on workers' annual leave balances. Maintain records of unpaid leaves
2. Update the list of workers covered by the Group Insurance Scheme to ensure that all workers are covered.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Service books will be updated and included current balance of annual leave.
2. An Earn Leave Register now maintain to keep record balance in annual leave record.
3. We already started bio metric worker registration system (provide BGMEA) that covered all the worker are included Group Insurance.

PREVIOUS FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

A review of time records from 40 sampled workers for January, July, and September 2015, revealed that most workers had worked beyond the daily legal limit of 10 hours a day and 60-hour per week limit as per FLA Benchmarks, including overtime. Some workers from the finishing department worked up to 75 hours a week during one to two weeks in those months. [HOW.1]

A review of time records for sampled workers for months of January, July, and September 2015, revealed that most workers have been working on 3-4 rest days during the months of January and September, and on 2 rest days in July, resulting in 16 to 23 days of continuous work with no rest days. The factory has not provided any compensatory rest days subsequently. [HOW.2]

A review of time records for January and September 2015 revealed instances where female workers from the finishing department worked beyond 10 PM and until midnight on 4 days (in sampled time period January and September 2015). The factory not obtained the legally mandated written consent from these female workers to work beyond 10 PM or obtained permission for this practice from local government authorities. Nor has the factory implemented extra precautions to protect the safety of female workers who work past 10 PM. Note: The legal regulations regarding overtime by female workers were put in place to address the safety concerns of this group of workers—particularly, with respect to the commute back home during night time—but compliance is not regularly enforced by local authorities. [HOW.1]

A review of time records for January 2015 revealed that a few female workers from the finishing department had worked overtime until 1am on Day 1 and had returned to work at 8am on Day 2. On Day 2, these workers worked until midnight. [HOW.1]

The factory usually sets production targets based on 10 hours of work per day (2 extra hours beyond the 8 regular daily working hours). [ER.24]

When there is overtime work, after 6 continuous hours of work, a 30-minute break is provided instead of a 1-hour break as required by law. Workers work from 2pm (after the lunch break) until 8pm before a 30-minute break is provided as a regular practice. [HOW.3]

Local Law or Code Requirement

Bangladesh Labor Code 2006 Section 100, 101, 102(2), 103, 104, 105, and 109; FLA Workplace Code (Employment Relationship Benchmark ER.24; Hours of Work Benchmarks HOW.1, HOW.2 and HOW.3)

Recommendations for Immediate Action

1. Monitor working hours to ensure that workers do not work beyond 10 hours per day and 60 hours per week.
2. Ensure that workers receive a rest day for every 7-day period. If work must be done on a rest day, provide compensatory rest days during the following weeks.
3. Ensure that breaks between shifts and for meals follow the legal requirements: 30 minutes of break after 5.5 hours of continuous work and 1-hour break after 6 hours of continuous work.
4. Ensure that production targets are set based on 8 hours of regular work per day.
5. Working hours need to be monitored to ensure that female workers do not work beyond stipulated working hours. In the case that female worker is to work OT, factory to implement the following:

- a. Inform workers at least 24 hours prior in case there is a need to work beyond pm.
- b. Written consent must be obtained from individual worker for work after 10 PM.
- c. Factory must obtain approval from the local labor department specifying the number of workers/ production processes with a copy of consent attached.
- d. Factory must ensure that female security guards and supervisors are present in all work areas.
- e. Transport should be arranged free of cost to transport workers home and should be accompanied by at least 2 female and 2 male security guards. Movement of vehicle should be tracked by the Admin /Security in-charge.
- f. Medical staff (Male and Female) must be available during all working hours.
- g. At least one HR staff must be present in the factory during working hours.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated

Explanation:

Based on a review of time records for sampled workers for months of September 2016, December 2016, April 2017, May 2017 and June 2017, workers worked beyond 10 hours a day and 60 hours a week. Workers worked up to 14 hours a day and 72 hours per week for at least two weeks in the months reviewed. [HOW.1]

Root Causes:

Actual productivity is less than expected and planned. Hence production falls behind and workers work additional overtime hours to meet delivery deadlines.

2. Finding Status: Not Remediated

Explanation:

Based on a review of time records for sampled workers for the months of September 2016, December 2016, April 2017, May 2017, and June 2017, workers worked on two rest days in May 2017 and four rest days in June 2017. This resulted in workers from all production processes continuously working for 13 to 20 days. Worker from the finishing section worked up to 29 days continuously with no day for rest. The factory did not provide compensatory off days. [HOW.2]

Root Causes:

Workers worked on rest days to meet delivery deadlines and to compensate for additional holidays provided with Eid festival in June 2017.

3. Finding Status: Not Remediated

Explanation:

A review of time records for April 2017, May 2017 and June 2017 revealed instances where female workers from the finishing department worked beyond 22:00 and until 23:00 on two days in May 2017 and until 23:35 on one to three days in June 2017. The factory had not obtained the written consent from these female workers to work beyond 22:00, as legally required, nor had the factory obtained permission from the local government authorities. The factory has not implemented extra precautions to protect the safety of female workers who work past 22:00. [HOW.1]

Root Causes:

Workers worked until 23:00 to meet delivery schedules. There is a lack of monitoring and commitment in implementing the legal requirements.

4. Finding Status: Not Remediated

Explanation:

A review of time records for June 2017 for sample revealed that a female worker from the finishing department had worked overtime until 22:34 on June 18, 23:35 on June 19, and 22:33 on June 20, 2017. On all the aforementioned dates, she started work at 7:00 and, after completing work, returned for the 7:00 shift the next day. [HOW.1]

Root Causes:

Workers must work until 23:35 and return to work for regular shift due to heavy workload.

5. Finding Status: Remediated Explanation:

Production planning is based on eight hours of work.

6. Finding Status: Remediated Explanation:

A 30-minute break is provided after five hours of work during overtime working hours.

Local Law or Code Requirement

Bangladesh Labor Code 2006 Section 100, 102(2), 103, 104, 105, and 109; FLA Workplace Code (Hours of Work Benchmarks HOW.1 and HOW.2)

Recommendations for Immediate Action

1. Monitor working hours to ensure that workers do not work beyond ten hours per day and 60 hours per week.
2. Ensure that workers receive a rest day for every seven-day period. If work must be done on a rest day, provide compensatory rest days during the following week.
3. Working hours need to be monitored to ensure that female workers do not work beyond the legal working hours. In the case that female worker is to work overtime, the factory to implement the following:
 - a. Inform workers at least 24 hours prior.
 - b. Obtain written consent from individual worker for work after 22:00.
 - c. Obtain approval from the local labor department specifying the number of workers and the production processes with a copy of consent attached.
 - d. Ensure there are female security guards and supervisors present in all work areas.
 - e. Provide free transport for workers to go home, accompanied by at least two female and two male security guards. Movement of vehicle should be tracked by the responsible Admin and/or Security.
 - f. Ensure medical staff (Male and Female) are available during all working hours.
 - g. Ensure at least one HR staff is present in the factory during working hours.
4. Ensure adequate rest is provided between shifts.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We are working on implementation the LAW accordingly. 2. We are working on implementation the LAW accordingly. 3. We are working on implementation the LAW accordingly. 4. We are working on implementation the LAW accordingly.

PREVIOUS FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

The factory policy on Termination does not define the different types of termination, e.g. Termination as a result of disciplinary decision, resignation, retirement, physical disability, illnesses or other possible reasons for resulting in the inability to continue employment. [ER.32]

The procedures on Termination & Retrenchment do not define methods for calculating final payouts. [ER.19]

The factory pays out termination dues within 30 to 45 days of termination of employment rather than seven days after the date of resignation or termination of employment as per local law. [ER.19]

For workers whose employment was terminated upon resignation, the time records which are based on wages for the last worked pay period, are not filed with the rest of their documents. Hence, the accuracy of the calculation of the wages for the last

pay period could not be verified. [ER.2, ER.23]

Local Law or Code Requirement

Bangladesh Labor Act 2006, 123 (2); FLA Workplace Code (Employment Relationship Benchmarks ER.2.1, ER.19, ER.23, and ER.32)

Recommendations for Immediate Action

1. Pay out terminal dues within seven days of the date of resignation/termination of employment.
2. Maintain all documents corresponding to terminal payouts with the rest of termination-related documents.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated

Explanation:

The policy on Termination does not define the different types of termination, e.g. termination as a result of disciplinary decision, resignation, retirement, physical disability, illnesses, or other possible reasons a worker's employment is terminated. [ER.32]

Root Causes:

There is a lack of awareness on the contents of the policy.

2. Finding Status: Not Remediated Explanation:

The procedure on Termination does not define methods for calculating final payouts. [ER.19]

Root Causes:

There is a lack of awareness on the contents of the written procedure.

3. Finding Status: Remediated Explanation:

Based on review of records, terminal dues are paid within 2-day post date of termination of employment.

4. Finding Status: Partially Remediated

Explanation:

Time records for days worked prior to termination of employment are not maintained along with documents for terminal payouts.

Hence, the accuracy wage payments could not be verified. Workers have signed pay records to acknowledge receipt of payment. [ER.2, ER.23]

Root Causes:

Lack of monitoring.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER 2.1, ER.19, ER.23 and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Policy will be updated soon.
2. We already took initiative for this. We hope it will not repeat again in future.
- 3.
4. Final settlement format is made. We will follow as per Law.

PREVIOUS FINDING NO.14

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

Workers' representatives in the Participation Committee are selected by the factory management, instead of being elected by the workers. [FOA.11]

The factory management does not provide any office space or other facilities for the worker representatives. [FOA.15]

Local Law or Code Requirement

Bangladesh Labor Code 2006, Section 205(7); FLA Workplace Code (Freedom of Association Benchmarks FOA.11 and FOA.15)

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated

Explanation:

Worker representatives are selected by management instead of being elected. [FOA.11]

Root Causes:

Management could not provide a reason why this concern was not addressed. There appears to be lack of initiative from management to implement corrective action.

2. Finding Status: Remediated

Explanation:

There is no independent union or worker organization in the factory. Factory has a joint worker – management committee and meetings are conducted in the conference room located inside the factory.

Local Law or Code Requirement

Bangladesh Labor Code 2006, Section 205(7); FLA Workplace Code (Freedom of Association Benchmarks FOA.11)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Worker representatives are being elected on 22/07/2017.

PREVIOUS FINDING NO.15

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

The procedures on Workplace Conduct & Discipline define the types of misconduct, but not the associated disciplinary actions. [ER.27]

The factory has not taken any written disciplinary actions so far; thus, there are no records of such actions. However, the factory has given out verbal warnings. The factory does not maintain any records of verbal warnings given as part of disciplinary procedures. [ER.2, ER.27]

The factory does not have a procedure in place for employees to appeal the disciplinary process. [ER.27]

Though workers are aware of general industry practices for disciplinary actions, awareness about specific factory procedures is low. [ER.16]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2.1, ER.16, and ER.27)

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status: Not Remediated Explanation:

The procedures do not define disciplinary actions corresponding to the listed misconducts. [ER.27]

Root Causes:

There is a lack of awareness on the requirement to have a written procedure.

2. Finding Status: Partially Remediated Explanation:

The factory maintains a record of written warnings and workers have signed to acknowledge receipt of the warning letter. Verbal warnings are, however, not recorded. [ER.2, ER.27]

Root Causes:

Management lacks initiative to implement the requirement.

3. Finding Status: Partially Remediated

Explanation:

Written procedures allow workers to appeal disciplinary action; however, they do not provide information the actual process to file an appeal. [ER.27]

Root Causes:

There is a lack of awareness on the requirement to have a written procedure.

4. Finding Status: Not Remediated Explanation:

Awareness on factory specific disciplinary policies and procedures is low. [ER.16]

Root Causes:

The factory does not have a defined and planned training calendar and trainings are currently conducted on ad hoc. Workers are selected at random from each production process and factory provides a 30-minute training that briefly covers all Employment Functions. During the last six months, 80 out of 814 workers have been trained on disciplinary procedures. There are no records available for the trainings conducted in 2016.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2.1, ER.16, and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will make a new procedure soon.
2. We started keeping of Verbal warnings record in a register.
3. We will inform Workers about Process of Appeal as per Local Law.
- 4.

We will try our best to do correctly.

PREVIOUS FINDING NO.16

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

The factory does not document grievances received verbally. Hence, there are no records of any grievances reported. Worker feedback revealed that grievances reported to management are addressed but workers' awareness on Grievance System are low. Additionally, the factory only has one grievance channel, which is to verbally address grievances; there are no suggestion boxes or any confidential grievance channels. [ER.2, ER.25]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.2 and ER.25)

VERIFICATION RESULT

Finding Status

Remediated

Remediation Details

Based on review of log of grievances reported, grievances reported are documented.

New Findings and Action Plans

NEW FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

The factory does not have written procedures on Hours of Work.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.23)

COMPANY ACTION PLANS

Action Plan no 1.

Description

We will make procedure very soon.

NEW FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

Workers do not receive written documentation that substantiates all the issues covered in orientation. [ER.15]

Out of 934 employees (which includes staff), only 150 on have been trained on the Grievance System. [ER.1, ER.15]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1.2, ER.15)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We provide Hand book which includes that documents. Moreover, we will include Staff.
2. We will include grievance training in all staff and worker in future.

NEW FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

For all five samples of workers who were on maternity leave, the factory did not pay the second installment of maternity benefits. The management said this was because these workers had neither reported for work or reported the birth of child. Management has not made any attempt to contact these workers nor has it initiated disciplinary procedures for unauthorized absenteeism. [ER.22, ND.8, C.5]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (Amended in 2015) Chapter IV Section 47; FLA workplace Code (Employment Relationship Benchmark ER.22; Nondiscrimination Benchmark ND.8; Compensation Benchmarks C.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

In future, we will notice to workers for joining work.

NEW FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

Snap button machine operators and over lock machine operators are not using eye shields. The cutting helper does not use hand gloves while assisting the cutter. There is blue color from fabric on the hands of sewing machine operators who work with denim; they are not provided with gloves. There is a risk of color getting stuck under finger nails which could be a health risk since workers eat lunch with their hands. [HSE.14]

Construction workers work inside a pit in the factory. The factory does not provide fall protection equipment like helmets, safety ropes, and fasteners. [HSE.7]

Workers with sitting jobs are provided chairs with back rests. However, most workers are standing barefoot (except for ironers), for whom the factory does not provide anti-fatigue mats. [HSE.17]

The factory does not provide lifting belts loading workers. [HSE.7]

Confined space is not marked. [HSE.1]

The lock and tag for the LOTO procedure is kept in the custody of safety officer and not near work areas. All the locks are new and have not been used, indicating that the factory has yet to implement the LOTO procedure. [HSE.14]

Local Law or Code Requirement

Bangladesh Factories Rules 1979 Section 40; FLA workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.14, and HSE.17)

Recommendations for Immediate Action

1. Provide PPE to over lock machine operators, cutting helpers, and sewing machine operators. Train workers on its use and monitor for compliance.
2. Provide fall protection equipment to construction workers. Train and monitor workers on the use of the equipment.
- 3.

Provide lifting belts for loading workers.

4. Mark confined spaces.
5. Implement the lockout-tagout procedure in work areas and ensure it is used during maintenance work.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Now Operators are using protective equipment. And about DENIM, we will more careful about following the advice.
2. Protection equipment were available to the construction workers. And we advise them to use that every time for their safety.
3. We will provide.
4. We will provide.
5. We will mark that soon
6. Now it is kept near the work station and follow LOTO procedure.

NEW FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

Construction material is stored in the designated assembly area on the side of the factory building. The assembly area is located adjacent to the building wall and not at a distance. This may be a risk to falling objects during a fire. [HSE.5]

There is lint on electric motors and overhead cable trays. [HSE.5, HSE.13]

Local Law or Code Requirement

Recommendations for Immediate Action

1. Remove construction material from designated assembly area on the side of the factory building and ensure assembly areas are maintained clear at all times. 2. Clean immediately and ensure there is no lint accumulation on electric motors and overhead cable trays.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will clean it.

2. It is done.

NEW FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

Sterilizer and oxygen are not available in the medical room. [HSE.18]

The Medical Clinic is not operational after 19:00, though workers work until 23:00. [HSE.18]

The factory does not track and record illness. [HSE.3]

Doors are either missing or broken on two out of four stalls in the male toilets on the third floor, on one out of three stalls in toilets located on first floor, and on one out of eight stalls in the female toilets located on first floor. There is no hand wash facility for the female toilets on the first floor. There is no soap or hand drying facility in either the male or female toilets. The bins in the female toilets are open and do not have lids. [HSE.19, HSE.20]

Local Law or Code Requirement

Bangladesh Factories Rules 1979 Sections 56(1), 56(4c), and 63; and FLA workplace Code (Health, Safety & Environment Benchmarks HSE.3, HSE.18, HSE.19, HSE.20, and HSE.23)

Recommendations for Immediate Action

1.
Provide means of sterilizing instruments and oxygen cylinder.

2.
Make appropriate arrangements to ensure medical room is open during all working hours.

3.
Track and record illnesses.

4.
Install doors all toilets stall and maintain these at all times. Provide hand wash facility, soap and hand drying facilities. Open bins provided in female toilets should be replaced with closed bins.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will provide.
2. In future it will be available.
3. We are tracking illness and we have Register.
4. Door reinstallation AND Soap case will be provided.