



**O'BRIEN &
ASSOCIATES**
INTERNATIONAL

**INDEPENDENT EVALUATION OF THE U.S. DEPARTMENT OF
LABOR'S TECHNICAL COOPERATION PORTFOLIO TO PROMOTE
WORKERS' RIGHTS IN BANGLADESH**

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ACKNOWLEDGEMENTS

This report describes in detail the evaluation of the portfolio of USDOL-funded projects in the Ready-Made Garment industry in Bangladesh. The multi-project evaluation was conducted between July 27 and September 11, 2015. Dan O'Brien, independent evaluator, conducted the evaluation in collaboration with the projects and stakeholders and prepared the evaluation report according to the terms in the contract with the United States Department of Labor. Mr. O'Brien would like to express sincere thanks to all parties involved in this evaluation for their support and valuable contributions.



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LIST OF ACRONYMS

ACCORD	Accord on Fire and Building Safety in Bangladesh
ALLIANCE	Alliance for Bangladesh Worker Safety
BEF	Bangladesh Employers Federation
BEPZA	Bangladesh Export Processing Zone Authority
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
BLA	Bangladesh Labor Law
BUET	Bangladesh University of Engineering and Technology
BW	Better Work
BWB	Better Work Bangladesh
BWG	Better Work Global
CIDA	Canadian International Development Agency
CTA	Chief Technical Advisor
DFID	UK Department for International Development
DIFE	Directorate of Inspection of Factories and Establishments
DL	Directorate of Labor (MOLE)
EBA	Everything but Arms
EPZ	Export Processing Zone
EU	European Union
F&BS	Fire and Building Safety
FMCS	Federal Mediation and Conciliation Service
FSCD	Bangladesh Fire Service and Civil Defense
FOA	Freedom of Association
FPRW	Fundamental Principles and Rights at Work
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GLP	Global Labor Project
GOB	Government of Bangladesh
GSP	Generalized System of Preferences
IAA	Inter-governmental Agency Arrangement
IBC	IndustriALL Bangladesh Commission
IBN	Interest Based Negotiation

ILAB	Bureau of International Labor Affairs
ILO	International Labor Organization
ILS	International Labor Standards
JPS	Joint Problem Solving
LFA	Logical Framework Approach
MOLE	Ministry of Labor & Employment
NCCWE	National Coordination Council for Workers' Education
NLRB	National Labor Relations Board
OSH	Occupational Safety and Health
PAC	Project Advisory Committee
PO	Program Officer (ILO Dhaka)
RAJUK	Rajdhani Unnayan Karttripakkha, Capital Development Authority
RMG	Ready Made Garments
RMGP	ILO's Ready Made Garment Program
RBM	Results Based Management
SC	Solidarity Center
SIDA	Sweden International Development Agency
TOR	Terms of Reference
UN	United Nations
US	United States
USAID	United States Agency for International Development
USDOL	United States Department of Labor
USG	United States Government

EXECUTIVE SUMMARY

Over the past five years, the United States Department of Labor's (USDOL) Bureau of International Labor Affairs (ILAB) has funded a range of projects and activities aimed at addressing legal and policy issues concerning workers' rights and workplace safety in Bangladesh. USDOL's technical cooperation efforts have focused on the ready-made garment (RMG) sector, as well as the shrimp-processing sector, and broader concerns relating to Bangladesh's labor law regime, including the separate laws and governance structure for Bangladesh's Export Processing Zones.

In 2011, USDOL provided a grant to the International Labor Organization (ILO) to implement the Promoting Fundamental Principles and Rights at Work (FPRW) project. The FPRW project intended to lay important groundwork on freedom of association and collective bargaining in preparation for a Better Work (BW) project. In 2012 and 2013, through an inter-governmental agency arrangement (IAA), USDOL allocated funds to the Federal Mediation and Conciliation Services (FMCS) to provide mediation and dispute resolution training to FPRW stakeholders.

A series of fatal industrial accidents that occurred in 2012 and 2013 and the suspension of the Generalized System of Preferences¹ (GSP) eligibility for Bangladesh in 2013 were key events that have influenced USDOL's strategic framework for Bangladesh. A fire at the Tazreen Fashion factory in 2012 killed 117 persons while the collapse of the Rana Plaza building in 2013 killed 1,129 persons and injured nearly 2,500. These accidents drew international attention to the RMG sector in Bangladesh. In addition, through a Presidential Proclamation in July 2013, the USG suspended the GSP trade benefit for Bangladesh due to a lack of progress on labor reforms. The USG has provided the Government of Bangladesh an "Action Plan" with 16 steps to improve worker rights so that GSP benefits might be restored.

Since 2011, USDOL has provided \$6,461,865 million of technical assistance and cooperation programming towards the achievement of these objectives. Please note that the dispute resolution and mediation services provided by FMCS are not a project but rather an activity provided under FPRW. Also note the BWDP is not included in this evaluation. The technical assistance and cooperation projects and activities include the following:

- Promoting Fundamental Principles and Rights at Work (FPRW)
- Better Work Design Project (BWDP)
- Federal Mediation and Conciliation Service (FMCS)
- Improving Fire and Building Safety in Bangladesh's RMG Sector (ILO F&BS)

¹ The GSP program provides for the duty-free treatment of designated articles when imported from beneficiary developing countries. The GSP program is authorized by Title V of the Trade Act of 1974 (19 U.S.C. 2461 et seq.), as amended, and is implemented in accordance with Executive Order 11888 of November 24, 1975, as modified by subsequent Executive Orders and Presidential Proclamations. The GSP program expired on July 31, 2013. GSP was reauthorized on June 29, 2015, by the Trade Preferences Extension Act of 2015. The GSP program is now effective through December 31, 2017.

- Improving Fire and Building Safety for Bangladesh’s RMG Workers (SC F&BS)
- Better Work Bangladesh (BWB)

The purpose of the evaluation is to assess the overall systemic impact and effectiveness of USDOL’s international technical assistance and cooperation programs in Bangladesh. Unlike most project implementation-focused evaluations, the purpose is not to evaluate any one particular project funded by USDOL. Rather the evaluation attempted to assess the results of USDOL’s contributions to promoting ILS in the Bangladeshi RMG sector, fill knowledge gaps and provide key lessons learned, and make recommendations on the design of future USDOL projects that aim to improve ILS.

The evaluation was conducted between July 27 and September 11, 2015. The evaluator reviewed project documents, developed data collection instruments, and prepared for the fieldwork during the week of July 27. Fieldwork was conducted in Bangladesh from August 3-20. The fieldwork culminated with a presentation and discussion of the preliminary findings with key project stakeholders on August 20. The bulk of the data analysis and report writing occurred from August 23 to September 11.

The evaluator interviewed 110 persons representing the key stakeholder groups. The evaluator conducted focus group discussions with trade union organizers, trade union leaders, and FSCD fire fighters who participated in the ILO F&BS training. These three focus groups account for about 37% of the interviews. Group interviews were conducted with BWB staff and trade union officials, and the SC F&BS project team that account for 20% of the interviews. The remaining 47% of the interviews were individual interviews.

The scope of the evaluation specifies three weeks of fieldwork, which was not enough time to interview all of the key stakeholders involved with the four USDOL-funded projects. It should also be noted that this evaluation is not a formal impact assessment. The findings for the evaluation were based on information collected from background documents and the key informant interviews. The accuracy of the evaluation findings are predicated on the integrity of information provided to the evaluator from these sources and the ability of the evaluator to triangulate this information.

Findings and Conclusions

Project Design and M&E Systems

The project designs of the four USDOL-funded projects vary considerably. They do not fully meet the project design criteria and guidance provided in the USDOL-ILO Management Procedures & Guidelines (MPG) such as the results framework or logic model diagram. Furthermore, the intermediate objectives and outputs that are not written to satisfy the definitions in the MPG. Likewise, the USDOL-funded projects do not fully meet the performance monitoring plan (PMP) guidance in the MPG. The primary weakness is that the projects did not submit a PMP that followed the recommended format in the MPG and included inadequate or inconsistent indicators and definitions for terms used in the indicators. Some projects are not submitting the data-tracking table with the TPRs, which is a requirement in the MPG.

The MPG guidance is intended to create a certain degree of uniformity among USDOL projects that allow managers to assess project performance and facilitate evaluations. Project designs and PMPs that do not follow the MPG guidance tend to create variations in how objectives, outputs, and activities are stated and organized that make it difficult to compare and contrast projects and their performance.

Relevance and Strategic Fit

The USDOL-funded projects have effectively collaborated with a range of stakeholders that include the Government of Bangladesh, trade unions, employers' associations and the RMG sector factories and brands. The most relevant support provided by the USDOL-funded projects is in the area of fire and building safety training. The key stakeholders believe that the training is highly relevant and timely. On the other hand, the dispute resolution training provided by FMCS under FPRW was the least relevant support. The government agencies, trade unions, and employers' associations do not believe the training was culturally relevant to the Bangladesh context and found it difficult to apply.

Progress and Effectiveness

The current USDOL-funded projects are behind in achieving indicator targets based on the PMPs and implementation schedules. The reasons include delayed start dates, political unrest and strikes, and, in the case of the SC F&BS project, restricted access to factories by factory management to conduct joint training for managers and union leaders.

The USDOL-funded projects have created synergies with other projects that have increased their effectiveness. FPRW collaborated closely with the Better Work Design Project funded by USDOL and provided the model for the Norwegian-funded FRLR project. The ILO F&BS project is collaborating very closely with the ILO RMG Program and creating synergies around building inspections, trainings, and databases. It is also collaborating with the Accord and Alliance initiatives. The SC F&BS project is built on the trade union groundwork laid by the USAID Global Labor Fund project.

The interest-based negotiation and joint problem solving training provided by FMCS proved to be largely ineffective for two primary reasons. First, reinforcement training and coaching was not provided as envisioned. Second, many training participants found it to be difficult to apply within the Bangladesh context. However, the MOLE would welcome new collaboration with USDOL to build capacity to more effectively respond to ILS issues such as freedom of association via union registration and support.

Efficiency and Use of Resources

It was not possible to conduct a formal cost-benefit or cost-effectiveness analysis because the projects do not share common impact or effect indicators and the evaluator did not have access to cost and impact standards to compare projects. Instead, an output-based budget analysis was conducted that shows that some of the outputs for FPRW and ILO F&BS projects appear to be expensive while the output costs for the SC F&B project appear to be relatively inexpensive. The cost for a factory to participate in BWB seems reasonable especially if the factory can significantly reduce non-compliance issues.

Project Management Arrangements

The USDOL-funded projects appear to be effectively managed. However, the management structures, especially staffing, varies significantly among the projects. For example, BWB has a technical and administrative team of 21 persons while the ILO and SC F&BS projects have about 2 persons each. FPRW staffing included 4 full time positions. BWB is the most expensive management structure due to the large number of personnel. The SC F&BS project is more expensive than one might think due to the number of headquarters personnel that are charged to the project as well as a high indirect rate. Reliance on national or regional talent and labor market rates would significantly reduce the cost of the management structures. Judicious and strategic use of qualified international consultants would be required to support local management and bring international best practices to projects. The other issue that surfaced was that the ILO F&BS CTA is managing components 1 and 2 of the ILO RMG Program, while also committing to 100% allocation of time on the USDOL-funded ILO F&BS project, which is disallowed in the grant's Cooperative Agreement with USDOL.

Impact Orientation

The evaluator was unable to conduct an empirical assessment of the impact of the USDOL-funded projects because the FPRW project did not have impact or effect level indicators and it is too early in the lives of the other projects to assess impact. This evaluation suggests that the portfolio of USDOL projects has contributed to improving fire and building safety in the RMG sector. Improving the Bangladeshi government's ability to address ILS and fire and building safety, also looks promising as long as the GOB has the political will to implement and enforce policy. However, the impact on ILS, especially the rights to freedom of association and collective bargaining, has been modest at best.

Sustainability

The MPG requires grantees to include sustainability plans or exit strategies in the project documents or provide them 60 days after the grant is awarded. The FPRW project document briefly mentions what should be sustained but does not include a sustainability plan. The BWB project document discusses sustainability within the BW business model and notes that a sustainability plan will be developed for Bangladesh. The plan has not yet been developed. The ILO and SC F&BS project documents do not have sustainability plans or exit strategies.

FPRW's contribution to the BLA 2006 amendments can be considered sustainable although they fall short of meeting ILS. The DOL online registration system has also been sustained. FPRW was not able to sustain the trade union capacity building program, the outreach education campaign, an anti-union discrimination mechanism, or labor management cooperation.

It is too early to determine whether the ILO and SC F&BS outputs and results will be sustained. The challenge for sustaining the ILO F&BS project policy output is the capacity and political will of the GOB to implement and enforce the fire and building safety regulations and laws. The ILO and SC F&BS projects invest heavily in training. To translate training into results, the training should be reinforced. To sustain the results, the projects should ensure that sustainable reinforcement mechanisms are established before the project ends.

BWB has the best opportunity to sustain itself as a program due to the revenue it can generate from factory subscriptions and the sales of compliance reports to brands. However, it must generate enough revenue to cover its expenses to be able to breakeven. The key to BW program sustainability in Bangladesh will be developing a local entity that can implement BW services based on local labor market rates.

Recommendations

1. ILO F&BS and RMGP

USDOL should work with the ILO Bangladesh management team to clearly define the roles and responsibilities of the ILO F&BS CTA as well as the activities and outputs the project is responsible for producing. There are several issues that should be addressed immediately. First, the cooperative agreement between the ILO and USDOL states that the CTA is required to spend 100% of the time on the USDOL-funded project. This is clearly not the case since the CTA spends considerable time managing the RMGP components one and two. Second, the ILO F&BS project is reporting to USDOL on building inspections that USDOL is not financially supporting. The project should report to USDOL on outputs and outcomes paid for with USDOL funds.

2. Indicators and Definitions

USDOL should require the ILO F&BS project to operationally define what it means by an upgraded fire and building safety regulatory framework. Based on the definition, the project should develop a set of clear and concrete indicators that can be used to measure the progress in achieving this output. This is an important output that contributes to the intermediate objective. The operational definition and indicators would help USDOL, ILO, and future evaluators to more precisely track, assess, and eventually determine whether the output was achieved.

3. Sustainability Plans

USDOL should require the ILO and SC F&BS projects to develop and submit sustainability plans as soon as possible. The ILO and SC F&BS sustainability plans should include what outputs or results will be sustained, the strategy for sustaining them, who is responsible, the timeframe, and the resources that are required to ensure their sustainability. The plan should include clear and concrete indicators to evaluate progress. The sustainability plans should be incorporated into the workplans and reported in technical progress reports and data-tracking tables.

4. International Labor Standards Project

USDOL might consider investing in a project designed to build the capacity of MOLE's Department of Labor (DOL) to promote ILS, especially freedom of association. USDOL might consider implementing the project in two phases. Phase one would involve hiring and placing an ILS expert within DOL to provide technical assistance and, at the same time, assess capacity, needs, and opportunities. The ILS expert would use the results of the assessment to work with USDOL to design the second phase, which would be the more formal capacity building component to more aggressively promote ILS.

5. Evaluation Recommendations

USDOL should require its grantees to address midterm evaluation recommendations since they are intended to improve the performance of the projects. The MPG 2013 includes an annex entitled *Update on Project Activities in Response to Evaluation and Audit Recommendations*. The USDOL project manager should require the grantee to complete and submit the form. Once submitted, the USDOL project manager should hold the grantee accountable for implementing the recommendations. If the recommendations are not addressed, USDOL should consider withholding fund allocations until the recommendations have been adequately addressed.

6. Project Design and Performance Monitoring

USDOL should require its grantees to adhere to the MPG guidance on project design and performance monitoring. USDOL has significantly improved the guidance it provides in the MPG over the past three years. The guidance on project design and performance monitoring is intended to improve the quality of the USDOL-funded projects and their ability to have and demonstrate impact and grantees should comply with it or face consequences.

7. Grantee Enforcement Mechanism

USDOL should consider developing an enforcement mechanism that would require grantees to adhere to the MPG requirements and address USDOL technical questions and recommendations aimed at improving project design, performance monitoring, interventions and strategies, and project management. For example, the first step would require the project director to address USDOL recommendations. If the recommendations were not adequately addressed within the time period requested, the next step would be for the OTLA director or deputy director to write to the grantee's headquarters to request that the recommendations and/or requirements be addressed. If the grantee still fails to address the recommendations or meet MPG requirements, the OTLA director or deputy director would raise the issue with the USDOL Grants Officer who would send a letter of notice to the grantee requiring that the recommendations and/or MPG requirements be addressed. The final step would be for USDOL to suspend further allocations of funds to the grantee until the recommendations or requirements are adequately addressed.

8. Output-Based Budgets

USDOL should require its grantees to adhere to the MPG requirement to develop and submit output-based budgets and reports. USDOL should ensure that each output is linked to a cost and indicator target, which will help USDOL assess the reasonableness of the cost of the output and compare common output costs among projects. The output-based budgets would also help external evaluators more effectively assess project efficiency.

9. Sustainability Design

USDOL should modify the MPG 2013 to require grantees to build the sustainability strategy into the project design. The sustainability strategy should include specific activities and outputs that are linked to the corresponding intermediate objective and should include indicators for the outputs and intermediate objectives that measure sustainability as well as resources dedicated to implementing the sustainability activities and producing the sustainability outputs. To help

ensure sustainability, USDOL should not allow grant funds to be used to pay staff salaries and rent or purchase capital items unless the grantee can clearly demonstrate how it would assume responsibility for these expenses once the project ends. For projects that invest heavily in capacity building, grantees should clearly demonstrate how training will be reinforced during the life of the project and sustained once the project ends. For projects that aim to address policies, grantees should articulate strategies to address obstacles to implementing policies that include government capacity and the political will to implement new or modified policies. The project should also specify how it intends to financially sustain key outputs such as information systems, tools, and websites.

10. Efficient Management Structures

USDOL should develop cost standards for project management structures aimed at increasing efficiency. The cost standards should be based on the principle of maximizing the use of national staff and minimizing the use of international staff. International staff, to the extent feasible, should be technical experts that provide short-term technical assistance. Grantees should provide a compelling business reason for those headquarters staff that are charged to the project. The cost standards might also establish a percent value of the total budget for headquarters staff, indirect rates, and other headquarters costs that should not be exceeded.

11. Dispute Resolution and Mediation Training

In countries where dispute resolution and mediation training have been identified as a technical assistance need and priority, USDOL should ensure that dispute resolution and mediation training and capacity building is incorporated into the design of the project where the training is part of a broader strategy to ensure the appropriate reinforcement of the training messages. The dispute resolution and mediation training outputs should also be linked to higher-level intermediate objectives or outcomes that measure the application of the training. Whether the dispute resolution and mediation training is provided by FMCS or another organization, the training should be culturally relevant to the country where the project is being implemented; the facilitators should possess relevant experience conducting dispute resolution and mediation from the country where the project is being implemented, the region, or at least similar countries; and the participants should be those who will likely be involved in dispute resolution or mediation activities. It is also recommended, as a good practice, for the grantee to conduct a needs assessment to ensure that the dispute resolution and mediation training is culturally and politically relevant.

I CONTEXT AND PROJECT DESCRIPTIONS

Over the past four years, the United States Department of Labor's (USDOL) Bureau of International Labor Affairs (ILAB) has funded a range of projects and activities aimed at addressing legal and policy issues concerning workers' rights and workplace safety in Bangladesh. USDOL's technical cooperation efforts have focused on the ready-made garment (RMG) sector, as well as the shrimp-processing sector, and broader concerns relating to Bangladesh's labor law regime, including the separate laws and governance structure for Bangladesh's Export Processing Zones (EPZs).

In 2011, USDOL provided a grant to the International Labor Organization (ILO) to implement the Promoting Fundamental Principles and Rights at Work (FPRW) project. The FPRW project intended to lay important groundwork on freedom of association and collective bargaining in preparation for a Better Work (BW) project. In 2012 and 2013, through an inter-governmental agency arrangement (IAA), USDOL allocated funds to the Federal Mediation and Conciliation Services (FMCS) to provide mediation and dispute resolution training to FPRW stakeholders.

A series of fatal industrial accidents that occurred in 2012 and 2013 and the suspension of GSP trade benefits for Bangladesh in 2013 were key events that have influenced USDOL's strategic framework for Bangladesh. A fire at the Tazreen Fashion factory in 2012 killed 117 persons while the collapse of the Rana Plaza building in 2013 killed 1,129 persons and injured nearly 2,500. These accidents drew international attention to the RMG sector in Bangladesh. In addition, through Presidential Proclamation in 2013, the USG suspended GSP benefits for Bangladesh due to a lack of progress on labor reforms.

“One June 27, 2013, President Obama announced his decision to suspend Bangladesh's trade benefits under the Generalized System of Preferences (GSP) in view of insufficient progress by the Government of Bangladesh in affording Bangladeshi workers internationally recognized worker rights.”²

The USG has provided the Government of Bangladesh an “Action Plan” with 16 steps to improve worker rights so that GSP benefits might be restored.

Since the USG issued the Action Plan, USDOL has intensified its technical assistance program, especially in the RMG sector, to ensure that economic growth and the gains from trade are closely associated with greater respect for workers' rights and improved workplace safety. The intensification includes grants to the ILO to implement a fire and building safety project and the BW program. USDOL also provided a grant to the Solidarity Center to build the capacities of union leaders and organizers to address fire safety concerns at the factory level.

In late 2013, USDOL developed a strategic framework to unify its technical assistance programs in the RMG sector. The framework consists of an overall goal of promoting respect for international labor standards (ILS) and the following three objectives:

² www.dol.gov/ilab/trade/preference-programs/bangladesh-gsp.htm

1. Improve the Bangladeshi government’s capacity to promote ILS.
2. Improve fire and building safety.
3. Improve respect for freedom of association in the RMG sector.

Since 2011, USDOL has provided \$6,461,865 million of technical assistance and cooperation programming towards the achievement of these objectives. The technical assistance and cooperation projects and activities include the following:

- Promoting Fundamental Principles and Rights at Work (FPRW)
- Better Work Design Project (BWDP)
- Federal Mediation and Conciliation Service (FMCS)
- Improving Fire and Building Safety in Bangladesh’s RMG Sector (ILO F&BS)
- Improving Fire and Building Safety for Bangladesh’s RMG Workers (SC F&BS)
- Better Work Bangladesh (BWB)

It should be noted that FMCS was not a project. Rather, it provided mediation and dispute resolution training under the FPRW project. Table 1 shows the USDOL-funded projects and activities, the implementing organizations, the focus, funding levels, and timeframe. The table is followed by a more in-depth description of each project and activity.

Table 1: Implementing Organization, Focus, Funding, and Timeframe for USDOL Funded Projects and Activities in Bangladesh

Name	Implementer	Focus	Funding USD	Timeframe	Notes
FPRW	ILO	ILS: FOA and CB	1,476,437	Oct. 2, 2011 to Sept. 30, 2013	No-cost extensions to Jun. 30 2015
BWDP	ILO	BW design	1,055,000	Nov. 1, 2011 to Jun. 30, 2013	N/A
FMCS	FMCS	Mediation, dispute resolution	228,900	Jan. 1, 2012 to Dec. 31, 2015	Funds allocated under IAA annually
ILO F&BS	ILO	Fire and building safety	1,500,000	Aug. 11, 2013 to Aug. 13, 2016	Delayed start date: January 2014
SC F&BS	Solidarity Center (SC)	Fire and building safety	1,000,000	Sept. 30, 2013 to Sept. 27, 2017	On schedule
BWB	ILO	Labor compliance	1,201,528	Sept. 16, 2014 to Dec. 31, 2016	Delayed start date: November 2014
Total			6,461,865		

Promoting Fundamental Principles and Rights at Work

Under the Better Work Global (BWG) Program, USDOL provided \$1,476,437 to the ILO to implement the FPRW project. FPRW was designed to be a two-year project starting in October

2011 and ending in September 2013. However, due to a variety of start-up and implementation delays, USDOL provided several no-cost extensions, and as such, FPRW ended in June 2015.

FPRW intended to lay important groundwork on freedom of association and collective bargaining in preparation for a BW program. The BWG was concerned about the gaps in compliance with ILS, especially freedom of association and collective bargaining rights. The FPRW project aimed to address these gaps and establish the necessary labor rights groundwork for a BW program by focusing on the following three objectives:

1. An improved legal framework in conformity with ILS and in particular ILO Conventions 87 and 98.
2. Enhanced freedom and capacity of workers and their representatives to exercise their rights in practice.
3. Improved labor-management cooperation at the enterprise level.

The first objective was intended to address shortcomings in the current Bangladesh Labor Law (BLA) 2006, especially regarding freedom of association and collective bargaining rights guaranteed by ILO Conventions 87 and 98. The second objective focused on building the capacity of trade unions to exercise their labor rights and responsibilities while the third objective concentrated on building collaboration between employers and workers at the enterprise or factory level.

Better Work Design Project

Part of the USDOL grant to ILO Better Work Global included \$1,055,000 to design the Better Work Bangladesh program. The Better Work Design Project (BWDP) was implemented between November 1, 2011 and June 30, 2013. In addition to the actual design of the BW program, one of the principal purposes of BWDP was to assess the feasibility of implementing a BW program within a difficult labor environment. Another key purpose was to orient the government, employers' associations, trade unions, factories, and buyers to the BW program and ensure that the stakeholders understood their roles and responsibilities.

Federal Mediation and Conciliation Services: Dispute Resolution and Mediation Training

USDOL has provided \$228,900 to FMCS under the IAA to provide training activities in Bangladesh. The funds were allocated on an annual basis from 2012 to 2015. The FMCS training programs supported FPRW with interest based negotiation (IBN) and joint problem solving (JPS) training in 2012 and 2013. More recently, FMCS has collaborated with the US Embassy in Bangladesh to provide mediation and dispute resolution training to a range of government, non-governmental organizations, and private sector actors. A summary of the four FMCS training visits to Bangladesh is presented below.

- *October 2012.* FMCS delivered the first in-country training program on IBN and JPS for government, labor, and employer officials that was based on an assessment that FMCS conducted in August 2012. The objective of the training was to help the participants develop the skills needed to move from adversarial approaches to labor-management interactions in which interest-based principles and new problem-solving skills could be used to resolve workplace disputes.

- *December 2012.* FMCS delivered a train-the-trainer course on IBN and JPS for leaders identified within the existing labor and management organizations. In addition to teaching many of the same IBN and JPS concepts introduced in the first trip, the second training introduced a wide range of adult learning principles and skills to help participants become effective trainers.
- *July 2013.* FMCS provided IBN and JPS training in the workplace with a new focus on safety given the collapse of the Rana Plaza. The trainers also delivered a program for the Bangladesh Export Processing Zones Authority (BEPZA). This program covered roles and responsibilities of labor officials, the importance of ethics, neutrality and objectivity, and an overview of early 20th century workplace safety and health violations that had provided the impetus for many U.S. workplace protections.
- *December 2014.* In collaboration with the US Embassy, FMCS provided mediation and dispute resolution trainings to the Ministry of Labor and Employment (MOLE), Bangladesh Institute for Management and Bangladesh Institute for Labor Studies, Bangladesh International Arbitration Centre, and H&M employees and suppliers.

USDOL allocated \$65,220 to FMCS for two training activities in 2015. The specific scope and timing of this training has not yet been determined. Table 2 shows a summary of the FMCS training that includes the trip dates, training topics, participating organizations, number of participants, and length of the training event.

Table 2: Summary of FMSC Training

Date	Training Topic	Organization	Number	Length
Oct. 2012	IBN	MOLE	3	3 days
		Employers' Associations	8	
		Trade Unions	10	
Dec. 2012	IBN/TOT	Employers' Associations	8	3 days
		Trade Unions	12	3 days
Jul. 2013	IBN	MOLE	25	3 days
		BEPZA	30	3 days
Dec 2014	IBN	MOLE/DIFE	25	3 days
	IBN/Mediation	BIM/BILS	22	3 days
	Dispute resolution	BIAC		1 day
		H&M suppliers	39	1 day

BIMS – Bangladesh Institute for Management Studies

BILS – Bangladesh Institute of Labor Studies

BIAC – Bangladesh International Arbitration Center

Improving Fire and Building Safety in Bangladesh's RMG Sector

USDOL awarded a \$1.5 million grant to the ILO in 2013 to implement the *Improving Fire and Building Safety in Bangladesh's RMG Sector* project (hereafter referred to as the ILO F&BS project). The project began operations in November 2013 and is scheduled to end in August 2016. The project aims to address fire and building safety-related risks in Bangladesh's garment sector, which were highlighted after several industrial accidents including the Tazreen factory

fire in 2012 and the collapse of the Rana Plaza in 2013. Reports have demonstrated that poorly constructed buildings, poor emergency procedures, blocked fire exits, and overcrowded conditions contributed to high death rates. Another important contributing factor has been the lack of government capacity to educate and enforce appropriate fire and building safety standards including effective inspection processes.

The principal target groups for this project are inspectors and safety managers that have responsibility for fire and building safety. These organizations include the Bangladesh Fire Services and Civil Defense (FSCD), Department of Inspection for Factories and Establishments (DIFE), Capital Development Authority (RAJUK), and the RMG employer associations. The project's overarching objective is to contribute to improved fire and general building safety in Bangladesh's RMG sector. The project's intermediate objective is to enhance the government's enforcement of fire and general building safety laws and regulations in the RMG sector and ensure that it is consistent with international labor and fire standards and good practices.

Improving Fire and Building Safety for Bangladesh's RMG Workers

USDOL provided a \$1 million grant to the Solidarity Center (SC) to implement the *Improving Fire and Building Safety for Bangladesh's RMG Workers* project (hereafter referred to as the SC F&BS project). The project started implementing activities in October 2013 and is scheduled to end in September 2017. This project builds on the concerns generated by disasters in the garment sector to address the serious fire and building structure challenges facing the RMG industry and to secure lasting improvements in working conditions.

The SC F&BS project strategy is predicated on improving the knowledge of workers and union leaders regarding fire and building safety standards and laws. Worker and union engagement and international pressure, in turn, should motivate employers and the government to improve workplace fire and building safety standards and enforce existing laws that allow democratic unions to represent increasing numbers of members.

The project's *overall objective* is to improve the representation and protection of workers in the RMG sector related to fire and general building safety. The *long-term outcomes* of this project include:

1. Improved capacity of workers and worker organizations to engage in effective dialogue with the government and employers on fire and general building safety strategic plans, including the National Action Plan (NAP) and related initiatives.
2. Improved knowledge of workers on fire safety and general building hazards and practices, fire-safety inspections, and means to report and propose remediation to the appropriate government authorities and/or factory managers.
3. Improved worker organizations' capacity to collectively and individually represent workers on fire and general building safety matters to ensure that their rights and interests are effectively protected.

Better Work Bangladesh

Once the Better Work Bangladesh (BWB) program was designed and approved, USDOL provided a \$1,201,528 grant to the ILO to implement the program. The USDOL funding complements \$3,621,636 of funds provided by the governments of Canada, Netherlands, United Kingdom, Switzerland, and France. The first phase of the BWB started in November 2014 and is scheduled to end in March 2016.

BWB aims to contribute toward improving the life of workers, their families and their communities, increasing compliance with domestic labor laws consistent with international labor standards, and increasing the competitiveness of the ready-made garment sector in Bangladesh. BWB specifically aims to build the capacities of stakeholders to identify, prevent, and address relevant problems through the most appropriate and effective means (tripartite, bipartite, individually). BWB operates on factory and national levels. At the factory level, BWB intends to build in-factory capacity to improve working conditions and establish management systems in participating factories. At the national level, BWB will assist in building constituent capacity to achieve structural, sustainable change in labor administration, industrial relations and social dialogue systems.

ILO RMG Family of Projects

When discussing the USDOL-funded labor projects that the ILO is implementing, the broader ILO RMG family of projects should be taken into account. The centerpiece of the ILO RMG projects is Improving Working Conditions in the RMG Sector in Bangladesh, which is commonly referred to as the RMG Program. The Canadian International Development Agency (CIDA), UK Department for International Development (DFID), and the Kingdom of the Netherlands are providing \$18.6 million through December 2016 to fund the following five components or projects:

- 1) Building and fire safety assessments
- 2) Labor inspection and support for fire and building inspection (ILO F&BS project)
- 3) Occupational safety and health awareness, capacity, and systems
- 4) Rehabilitation and skills training for victims of the Rana Plaza building collapse
- 5) The Better Work Bangladesh program

The BWB program is listed under the RMG Program because the donors agreed to provide \$2.53 million of its \$18.6 contribution to BWB. However, BWB also has funding from USDOL, France, and Switzerland.

Table 3 shows the complete list of the ILO RMG family of projects along with the corresponding donors, amount of the contribution secured to date, and the anticipated end date of the project. The table also includes \$228,900 that USDOL allocated to FMCS to provide IBN and JPS training under FPRW, which ended in July 2015. However, it does not include the \$65,220 that USDOL allocated to FMCS for mediation training activities in 2015 that have yet to be expended. Also, as mentioned above, DFID, CIDA, and the Kingdom of the Netherlands are

contributing \$29.7 million to the RMG Program of which \$2.53 million has been allocated to BWB.

Table 3: ILO Bangladesh RMG Sector Family of Projects

Project Name	Donor	Amount	Start Date	End Date
Improving Fire and General Building Safety in RMG Sector	USDOL	1,500,000	Aug. 2014	Aug. 2016
Better Work Program	DFID	943,806	Sept. 2014	Dec. 2016
	Netherlands	943,806		
	CIDA	637,707		
	USDOL	1,201,528		
	SIDA	554,324		
	France	541,741		
Improving Working Conditions in RMG Sector	DFID	10,156,502	Oct. 2013	Dec. 2016
	Netherlands	10,156,502		
	CIDA	6,862,293		
Promoting Workplace Cooperation in RMG Sector	Denmark	303,916	Mar. 2015	Feb. 2016
RMG Centers of Excellence	SIDA	1,500,000	Jan. 2014	Jun. 2017
Promoting Workers Rights and Labor Relations in Export Oriented Industries	Norway	2,513,123	Jun. 2013	Dec. 2015
Better Work Design Project	USDOL	1,055,000	Nov. 2011	Jun. 2013
Promoting Fundamental Principles of Rights at Work	USDOL	1,476,437	Oct. 2011	Sept. 2015
Federal Mediation Conciliation Services (training activities under FPRW)	USDOL	228,900	Jan. 2012	Dec. 2014
Totals		40,575,585		

In terms of contributions to the ILO RMG sector, DFID and the Kingdom of the Netherlands are contributing 28% each, which makes them the largest contributors followed by CIDA's contribution that accounts for 19%. USDOL has provided \$5,461,865 to the ILO RMG sector work, which represents 13% of the total RMG sector funding. Norway, Sweden, France, and Denmark are contributing 6%, 5%, 1%, and 1%, respectively.

Regarding the contribution of the USDOL-funded projects to the RMG sector, the ILO Country Director commented, "We consider the USDOL contribution and support as invaluable. In addition to the monetary contribution, the support received from the US Embassy through the compact and 5+3+1³ is very significant in the RMG program being implemented by ILO. The funding proportions cannot by themselves be the benchmark for the partnership and overall contribution by the US Government in this important partnership."

³ The 5+3+1 is an informal working group consisting of GOB, donors, and ILO officials.

II EVALUATION PURPOSE AND METHODOLOGY

2.1. Evaluation Purpose

The purpose of the evaluation is to assess the overall systemic impact and effectiveness of USDOL's international technical assistance and cooperation programs in Bangladesh. Unlike most project implementation-focused evaluations, the purpose is not to evaluate any one particular project funded by USDOL, but to accomplish the following:

- Assess the results of USDOL's contributions to promoting ILS in the Bangladeshi RMG sector, and in Bangladesh in general.
- Fill knowledge gaps and provide key lessons learned that could be applied to future USDOL programming.
- Make recommendations on the design of future USDOL projects that aim to improve ILS.
- Make recommendations on how to enhance USDOL's grant-making effectiveness to promote ILS in Bangladesh's export garment sector and in other similar contexts in other countries in the future.

This evaluation examines the extent to which USDOL-funded assistance and cooperation efforts have worked together to promote USDOL's mission and broader US Government policy and priorities as they relate to the Bangladeshi export RMG sector. In addition, the evaluation assesses program effectiveness, efficiency, impact, and sustainability. Based on its findings, this evaluation makes recommendations for improving program effectiveness and efficiency, strengthening collaboration and partnerships, reducing duplication, enhancing synergies across complementary programs, and positioning program efforts for maximum impact and sustainability.

It should be noted that this is a special evaluative study commissioned at the request of USDOL to answer decision-makers' questions regarding implementation, impacts, and sustainability to improve programming and maximize results. As such, the primary audience is USDOL. To a lesser extent, the implementing organizations and partners, the Bangladeshi government, trade unions, and other parties involved in the execution of the projects would use, as appropriate, the evaluation findings and lessons. The evaluation's findings, conclusions and recommendations also would serve to inform stakeholders in the design and implementation of future labor cooperation efforts.

USDOL developed a set of questions to guide the evaluation methodology, which is described in the following section. The evaluator did not receive additional input on the TOR and the evaluation questions during the fieldwork. The questions address key issues in (1) project design and performance monitoring plans; (2) relevance of the project to the situation in Bangladesh; (3) effectiveness in achieving objectives and outputs; (4) efficiency and use of resources; and (5) effectiveness of project management; (6) impact orientation; and (7) sustainability of the project's interventions. The evaluation questions appear in the Terms of Reference (TOR) in Annex A.

2.2. Methodology

The evaluation used primarily qualitative data collection methods. Quantitative data were also obtained from project documents and reports, to the extent that they were available, and incorporated into the analysis. Data collection methods and stakeholder perspectives were triangulated, where possible, to increase the credibility and validity of the results. The interview process incorporated flexibility to allow for additional questions, ensuring that key information was obtained. A consistent protocol was followed during each interview.

Evaluation Schedule. The evaluation was conducted between July 27 and September 11, 2015. The evaluator reviewed project documents, developed data collection instruments, and prepared for the fieldwork during the week of July 27. Fieldwork was conducted in Bangladesh from August 3-20. The fieldwork culminated with a presentation and discussion of the preliminary findings with key project stakeholders on August 20. The bulk of the data analysis and report writing occurred from August 23 to September 11. The complete schedule of evaluation activities appears in the TOR Annex A.

Data Collection and Analysis. As noted previously, USDOL developed a list of evaluation questions that served as the basis for the evaluation. The questions were used to develop guides and protocols for the key informant interviews and document reviews. The master key informant interview guide is listed in Annex B. The following methods were employed to gather primary and secondary data.

Document Reviews. The evaluator read a variety of project documents and other reference publications. These documents included the project documents, technical progress reports, work plans, performance monitoring plans, and trip reports. Annex C shows the complete list of documents that were reviewed.

Key Informant Interviews. The evaluator conducted 23 individual and group interviews with USDOL, ILO, Solidarity Center, Government of Bangladesh, employer associations, trade union officials, trade union organizers and leaders, factories, and buyers. A complete list of interviews appears in Annex D.

The document reviews and key informant interviews generated a substantial volume of raw qualitative data. The evaluator used qualitative data analysis methods, including matrix analysis, to categorize, triangulate, synthesize, and summarize the raw data captured from the interview notes. The results of the data analysis provided tangible blocks of information, which the evaluator used to write the evaluation report. The data analysis was driven by the evaluation questions in the TOR.

Sampling Methodology. The evaluator used a purposeful, non-random sampling methodology to select the interviewees. Table 4 summarizes the populations interviewed, the interviewing methodology, the sample size, and characteristics of the sample.

Table 4: Population, Methodology, Sample size, and Sample Characteristics

Population	Method	Sample Size	Sample Characteristics
USDOL	Individual interview	5	ILAB-OTLA program managers and officials from

		the USDOL Deputy Undersecretary for International Labor Affairs
US Embassy	Individual interview	1 Labor attaché
USAID	Group interview	3 Democracy and governance officer and assistants
ILO management	Individual interviews	6 Country Director and CTAs for RMGP, FPRW, BWB, ILO F&BS
BWB	Group interview	6 BWB enterprise advisors and training officers
Solidarity Center	Individual interviews	6 Country Director and SC F&BS technical team
Government officials	Individual interviews	13 MOLE, DL, DIFE, BEPZA, FSCD, BUET
FSCD	Group interviews	10 Focus group interview with ILO F&BS training participants
Trade union officials	Group interviews	8 IBC and NCWEE federations
Trade union organizers and leaders	Group interviews	29 Focus group interview with SC F&BS training participants
Employer associations	Individual interviews	8 BEF, BGMEA, BKMEA
Factories	Individual interviews	10 Factory compliance staff from Beximco, Masco Group, Natural Apparel, and Sterling Styles
Brands	Individual interviews	3 Compliance managers from Children's Place, H&M
Brand F&BS initiatives	Individual Interviews	2 Executive directors from Accord and Alliance
Total Interviewed		110

The evaluator interviewed 110 persons representing the key stakeholder groups. The evaluator conducted focus discussions with trade union organizers, trade union leaders, and FSCD fire fighters who participated in the ILO F&BS training. These three focus groups account for about 37% of the interviews. Group interviews were conducted with BWB staff and trade union officials, and the SC F&BS project team that account for 20% of the interviews. The remaining 47% of the interviews were individual interviews.

Limitations. The scope of the evaluation specifies three weeks of fieldwork, which was not enough time to interview all of the key stakeholders involved with the four USDOL-funded projects. While the evaluator believes that the sample described in the table above is representative of the projects' stakeholders, several key stakeholder groups were not included. These include DIFE and RAJUK inspectors. In addition, the sample size of the factories participating in the ILO and SC F&BS projects and factories and brands participating in the BWB program is relatively small.

It should also be noted that this evaluation is not a formal impact assessment. The findings for the evaluation were based on information collected from background documents and the key informant interviews. The accuracy of the evaluation findings are predicated on the integrity of information provided to the evaluator from these sources and the ability of the evaluator to triangulate this information.

III FINDINGS

The following findings are based on the review of key project documents and interviews conducted during the fieldwork phase. The findings address the key questions listed in the TOR and are presented according to the major evaluation categories: project design and performance monitoring, relevance, effectiveness, efficiency, project management, impact orientation, and sustainability.

3.1. Project Design and Performance Monitoring

The following section reviews the USDOL requirements for project design and the performance monitoring plans (PMP) as stipulated in the Management Program Guidelines (MPG) and compares them to the project designs and PMPs. Based on the comparisons; observations are made regarding the effectiveness of the project designs and PMPs for each project.

Project Design

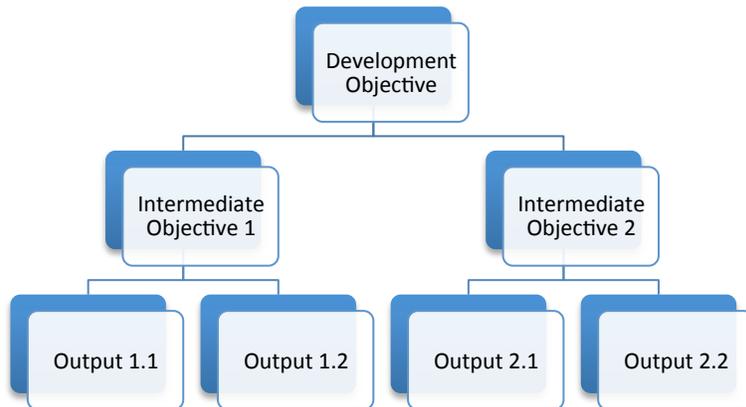
USDOL provides project guidance in its MPG document. The MPG requires its grantees to use a Results Framework (RF). The RF is a tool that depicts the project hypotheses, which is the logical sequence of cause-and-effect events that include activities, outputs, outcomes, and the overall goal. The following table provides the definitions used in the MPG.

Table 5: Definitions

Hierarchy	Description
Development Objective	The higher aspiration that the project's outcomes or intermediate objectives contribute to but are not expected to attain.
Intermediate Objective	Intermediate objectives are outcomes or results that represent changes/improvements in policies, knowledge, skills, and behaviors or practices that managers are expected to accomplish. The intermediate objectives should make a significant contribution to the project's development objective.
Sub Intermediate Objectives	In certain cases, the project designer may decide to include an additional hierarchy at the intermediate objective level. This might include, for example, practices or behaviors that lead to a change in policy and system.
Outputs	The outputs are the specific products, services, or systems that achieve the intermediate objectives. The project is responsible for producing outputs, which are tied to specific activities and budget resources.
Activities	Activities are the specific actions that the project executes to produce outputs.

Figure 1 shows the USDOL RF that includes the relationships between the outputs, intermediate objectives, and development objective. As noted previously, the results framework serves as the project's logic model of how outputs achieve outcomes and how outcomes contribute to the project's intended impact.

Figure 1: USDOL Results Framework



The designs of the USDOL-funded projects in Bangladesh vary considerably. It should be noted that the IBN and JPS training services provided by FMCS were not designed as a stand-alone project. The FMCS trainings were conducted to support FPRW’s third objective, which was to establish labor-management cooperation at the enterprise level.

The FPRW midterm evaluation identified a range of weaknesses in its project design along with recommendations to USDOL to improve future design. USDOL urged FPRW to address the midterm recommendations including those to improve the project’s design. While the ILO and SC fire and building safety projects and the Better Work Bangladesh program meet many of the USDOL RF criteria, some important criteria are not fully met, especially in the logic model (cause and effect relationships) and definitions for outputs and intermediate objectives. The degree to which the USDOL-funded projects meet the RF criteria is discussed below by each project.

Promoting Fundamental Principles of Rights at Work (FPRW)

The FPRW project design does not fully meet the project design guidance in the 2010-MPG. The FPRW project document does not include a RF that shows the logical (cause and effect) relationships between outputs and objectives. Instead, it lists three objectives and a series of outputs in the strategy section. Each output includes a short list of three to four activities. The project document does not include a development objective and the immediate objectives do not have indicators, which are discussed in more detail under the performance monitoring section.

Furthermore, three outputs do not contribute to the achievement of their corresponding objectives while four of the outputs are written as activities instead of outputs. For example, the diagnostic study (Output 1.1) and national action plan (Output 1.2) do not contribute to achieving an improved legal framework in conformity with ILS (Intermediate Objective 1). In addition, conducting capacity building training (Output 2.3), delivering educational outreach (Output 2.4), and developing an anti-union discrimination complaints mechanism (Output 2.5) are written like

activities instead of outputs. An in-depth analysis of the FPRW project design is provided in the midterm evaluation report.⁴

Improving Fire and General Building Safety in Bangladesh (ILO F&BS)

The project document does not include a RF diagram, as described in the MPG 2013, consisting of the outputs, intermediate objectives and development objective. Instead, it provides a logic model diagram that lists the inputs, outputs, outcomes, and impact as well as the cause and effect relationships between these hierarchies. It also includes a modified logical framework⁵ with the development objective, intermediate objective, outputs, and activities.

The project's impact level or development objective is "*contributing to improved fire and general safety in Bangladesh's RMG sector.*" This development objective, in the opinion of the evaluator, is vague. It does not clearly state the impact that the project will ultimately have on fire and building safety in the RMG sector. It might have been stated in terms of factories in the RMG sector that meet established fire and building safety standards or even in terms of reductions in fires, building collapses, and death and injuries related to these kinds of industrial accidents. The ILO set the project's objectives within its RMG sector framework. USDOL requested that the project follow USDOL's logic model and framework over the RMG plan, where the two were not fully consistent with each other.

The project has one outcome or intermediate objective, which states that the "*GOB enforcement of fire and general building safety laws and regulations in the RMG sector, consistent with international labour and fire standards and good practices, is enhanced.*" The intermediate objective meets the USDOL RF criteria as defined in the MPG 2013 in that it reflects an improvement in policies that contribute to improved fire and general safety in the RMG sector. However, this objective would have benefited from having an operational definition for "enhanced" that could be objectively measured and verified. In other words, if the project were successful at enhancing the fire and building safety laws and regulations, what would they look like?

The project has five outputs, which are summarized below:

1. Regulatory framework upgraded and functioning
2. Labor inspection procedures and tools upgraded
3. Inspectors' capacities strengthened
4. Efficient and timely inspections conducted
5. Data-tracking system functioning

Outputs 1, 4, and 5 are stated more as outcomes than outputs as defined in the USDOL RF guidance. They reflect improvements in policies and behaviors or practices. In fact, the logical sequencing, in the opinion of the evaluator, might be improved if the RF would be organized

⁴ United States Department of Labor, Independent Midterm Evaluation of the Promoting Fundamental Principles and Rights at Work in Bangladesh Project, September 2013.

⁵ The logical framework used by the project lists objectives, outputs, and activities. The traditional LogFrame includes indicators, means of verification, and assumptions.

around three intermediate objectives: upgraded and functioning regulatory framework, efficient timely inspections, and a functioning data-tracking system. The improved inspection procedures and tools and capacities would serve as outputs under efficient and timely inspections. The evaluator also believes that Output 1 should include an operational definition for an upgraded regulatory framework because interviews suggested that the government, project management, and USDOL have slightly different visions of what an upgraded regulatory framework might look like if achieved.

Improving Fire and Building Safety for Bangladesh's Ready-Made Garments Workers (SC F&BS)

The project document does not contain a RF that meets the guidance in the MPG 2013. It does include a diagram that shows the causal relationship between six levels of hierarchy. These consist of inputs, activities, outputs, intermediate objectives, outcomes, and the overall objective. The diagram also includes assumptions and external factors as required by the MPG 2013.

The overall objective or development objective is “*improved representation and protection of workers in the RMG sector related to fire and general building safety.*” In the opinion of the evaluator, this objective does not clearly describe the impact the project’s strategy aims to achieve. The project’s training and other capacity building activities are intended to translate into decreased risk and fewer fire-related accidents, deaths, and injuries in the workplace. The project design would be better served if the development objective had been stated in these terms.

The project document lists three “*longer-term objectives*” that include “*increasing the capacity of workers and worker organizations to engage factory management and GOB on fire and safety issues, increasing their knowledge on fire and safety issues (laws, standards), and increasing capability of worker organizations to represent workers on fire and building safety issues.*” While the USDOL RF does not include an objective hierarchy called “*longer-term objective,*” these objectives meet the criteria for intermediate objectives. They are clearly written, reflect improvements in knowledge and practices, and contribute to the achievement of the development objective.

In addition to the “*longer-term objectives,*” the project’s framework includes intermediate objectives. These could be classified as sub-intermediate objectives in the USDOL project design guidance in the MPG 2013. They too meet the criteria for intermediate objectives. The problem is that they are included as intermediate objectives in the project’s logic model but also listed as outcome indicators in the project’s PMP. The indicators, according to the guidance, should be independent measures to assess outcomes but not the outcomes themselves. The project should decide whether to use them as sub-intermediate objectives or indicators for the “*longer-term objectives.*”

The project’s framework lists seven major activities. Each activity, on average, has two outputs, which is the reverse of most project designs with which the evaluator is familiar. For example, project designs usually state outputs in terms of number of people trained with specified skills sets or competencies, number of committees established, or number of unions legally registered. Each output would include several activities necessary to produce the output. The other problem is that while these are listed as outputs in the logic model, they are used as indicators in the PMP.

The project might consider reorganizing its activities under outputs and stating the activities along with activity targets in the same statement and do the same for outputs.

Better Work Bangladesh (BWB)

The BWB project document does not include a RF diagram that shows the causal relationships between outputs, intermediate objectives, and development objective as required by the 2013-MGP. It does, however, include a modified logical framework that is organized according to the intermediate objectives and their corresponding outputs and activities.

The BWB development objective is to “*contribute to improving the life of the workers, their families and their communities, and increase the competitiveness of the RMG sector in Bangladesh.*” This is a standard BWG development objective used for all BW programs. However, in the opinion of the evaluator, it consists of two goals: improve lives of workers, families, and communities and increase enterprise competitiveness. The problem is that BWB might achieve an increase in competitiveness that does not translate into improved lives of workers. BWB might consider listing increased competitiveness as an intermediate objective with a set of indicators to measure increases in competitiveness.

Regarding the other part of the goal, there is evidence, based on perception studies, that demonstrates the relationship between BW life skills training and improvements in worker conditions.^{6 7} However, the perception studies and other BW evaluations⁸ suggest that the causal relationship between BW life skills training interventions and improvements in life of workers and families are limited to the training participants. The numbers of workers who participate in BW life skills training comprise a relatively small portion of the total factory workforce. Furthermore, the BW evaluations found that the dissemination of life skills training to the broader workforce is generally not effective.

The BWB project design consists of four intermediate objectives: (1) BWB’s assessment, advisory and training services have been a driver of change towards higher compliance with national labour law and international labour standards; (2) appropriate mechanisms to reach impact beyond the factory level are in place; (3) BWB has prepared the ground for moving towards financial, institutional and political viability and (4) establish the BW program in Bangladesh.” The fourth intermediate objective is unusual because most project designs that the evaluator is familiar with do not include project start-up as a discrete outcome.

The BWB design consists of 16 outputs that are allocated among the four intermediate objectives. The majority of the outputs meet the USDOL project design guidance for outputs, which are tangible products, services, or systems that have been provided or established and

⁶ K. Pike and S. Godfrey 2014, “Workers’ Perceptions of Compliance with Labour Standards: Assessing Opportunities and Challenges for Better Work in Lesotho’s Apparel Sector” in *Towards Better Work* (Eds.) A Rossi, A Luinstra and J Pickles Palgrave Macmillan: Houndmills/International Labour Office: Geneva.

⁷ K. Pike and S. Godfrey, “Two Sides to Better Work: A Comparative Analysis of Worker and Management Perceptions,” 2014.

⁸ Evaluations conducted by O’Brien and Associates International for USDOL in Vietnam, Cambodia, Lesotho, and Nicaragua.

contribute to the achievement of the intermediate objective. The evaluator believes that the outputs could have been written more specifically in terms of the product, service, or system with the target (i.e. number of compliance assessments conducted, number of compliance assessment reports sent to buyers, number buyers purchasing reports, number of workers trained by training topic, and amount of revenue generated per year). In fact, many of the BWG indicators translate into appropriate outputs.

Performance Monitoring

USDOL provides guidance on performance monitoring in the MPG. Specifically, the MPG requires grantees to include the PMP with the project document. Table 6 shows the PMP format that consists of the performance indicator, definitions for terms used in the indicator along with the unit of measure, the data source, data collection methodology, frequency of data collection and the person or office responsible for data collection.

Table 6: Sample of Performance Monitoring Plan from the MPG

Performance Indicator	Indicator Definition and Unit of Measure	Data Source	Method/Approach to Data Collection	Data Acquisition	
				Schedule/Frequency	Responsible Office
Intermediate Objective 1:					

The degree to which the USDOL-supported projects satisfy the PMP requirements in the MPG varies among projects. The PMPs and the quality and appropriateness of the indicators are discussed below for each project.

FPRW

The FPRW project design did not have a PMP with indicators for the three outcomes. The following analysis comes from the FPRW midterm evaluation report:

According to the LFA, project objectives should be the tangible outcomes that directly contribute to the achievement of the goal. Typically, outcome level objectives are written as tangible improvements or changes in conditions, behaviors, and practices. Objective 1, an improved legal framework, is stated more like an output rather than an outcome. Stating the objective in terms of continued improvements to BLA 2006 to bring it in line with ILS reflects both changes in conditions and practices and would thus meet the criteria for an outcome. The project document, however, does not include indicators for the objectives, which makes an assessment of their feasibility and potential effect difficult.⁹

⁹ United States Department of Labor, Independent Midterm Evaluation of the Promoting Fundamental Principles and Rights at Work in Bangladesh Project, September 2013.

Based on the midterm evaluation recommendations, the project developed indicators. However, the final project evaluation found the indicators to be inadequate in order to accurately measure the outputs and outcomes.

Improving Fire and General Building Safety in Bangladesh

The ILO F&BS project used a modified PMP consisting of indicators and data sources but it does not include definitions for terms used in the indicators, units of measure, data collection methods, data collection frequency, and the persons responsible. The output indicators are generally appropriate measures and disaggregate data by gender and other important characteristics. However, it should also be noted that the PMP does not include an indicator for the data-tracking system output.

The major indicator weakness is at the intermediate objective level. The evaluator does not believe that the *number of assessments* and *percent of factories covered* indicate improvements in the GOB enforcement of fire and building safety laws and regulations. Improved enforcement of the laws and regulations should be measured. More appropriate indicators might include the number of factories sanctioned for violations or the percent of violations documented that are remedied by the factories. The violations should be categorized as serious (danger to life and health) or deminimis (not an immediate danger to life and health).

In addition, one of the indicators to measure Output 1.1 (fire and building safety regulatory framework upgraded) is progress made on upgrading the framework. The evaluator considers this a weak indicator. The project should consider developing concrete milestones that would measure the progress. According to the USDOL project manager, he made requests to revise indicators in his comments to the TPRs.

Another problem that the evaluator discovered was that the indicators listed in the project document, PMP, and data-tracking table vary among these documents. For example, the project document lists the intermediate objective indicators as the number of assessments conducted and percent of factories covered. On the other hand, the PMP lists the indicator as mechanisms in place to enforce building and fire safety regulations. The indicator tracking table lists three primary indicators that include the number of structural inspections, number of fire safety inspections, and number of factories with a safety management plan. These are the inspections that the RMG Program is conducting under the National Initiative funded by DFID, CIDA, and the Kingdom of the Netherlands. Several of the output indicators also vary among these three documents.

Improving Fire and Building Safety for Bangladesh's Ready-Made Garments Workers

The SC F&BS project document includes a modified PMP, which includes indicators for outcomes and outputs, proposed data collection methods or tools, frequency of data collection, and person or office responsible. It does not include definitions for terms used in the indicator or the unit of measure. In addition, it includes the baseline value, target value, and data disaggregation requirements that are typically part of the data collection tables rather than the PMP. It also includes the activity, which typically is not a requirement for the PMP or data collection table.

The output and outcome indicators are organized under each intermediate objective and satisfy the definitions for output and outcome indicators in the MPG 2013. The outcome indicators address numbers of people trained, certifications, or training events. The outcome indicators attempt to measure new skills or knowledge about fire and building safety. The outcome indicators under the third intermediate objective attempt to measure the extent to which factory management addresses or resolves fire and safety concerns identified by union leaders. Perhaps these indicators could have been expressed as the percent of issues that were identified by union leaders that were satisfactorily addressed by factory management. The evaluator believes the challenge will be to independently verify whether factory management is addressing the fire and building safety issues identified by the union leaders. One verification option would be OSH committee meeting minutes that document action items and the status of issues raised that would provide credible verification.

Better Work Bangladesh

The BWB project document does not include a PMP as described in the MPG 2013. The logical framework, described previously under the project design section, includes the indicators and means of verification (data source and methods). However, it does not include indicator definitions, unit of measure, frequency of data collection, and persons or offices responsible for collecting the data.

BWG requires the BW country programs to collect and report on 35 standard indicators. These indicators are designed to measure outcomes and outputs of the BW interventions. BWB has effectively incorporated the 35 standard indicators in its project design and logical framework that it reports to BWG as well as the donors. The one exception is the indicators for Intermediate Objective 4 that addresses sustainability. The evaluator believes that the project should have developed indicators to assess progress towards (1) defining a sustainable BW management structure and (2) measuring progress towards its financial sustainability. This might include revenue over the projected costs of the management structure.

Summary of Project Design and PMP Findings

To visualize and summarize the results of the project design and PMP analyses above, the evaluator allocated the four USDOL-funded projects into one of four quadrants below in Table 7. It should be noted that the IBN training provided by FMCS is not included because the MPGs do not apply to technical assistance provided by inter-agency partners through non-grant mechanisms. The quadrants classify the projects as fully meeting MPG criteria for project design and PMP, meeting most criteria, meeting some of the criteria, and not meeting MPG criteria. Consistent with the discussion above, none of the projects fully meet the project design and PMP criteria described in the MPG.

Table 7: Summary of Project Design and PMP Findings

Fully meets MPG criteria	Meets most MPG criteria
	<ul style="list-style-type: none"> ▪ SC F&BS ▪ BWB
Meets some MPG criteria	Does not meet MPG criteria
<ul style="list-style-type: none"> ▪ ILO F&BS 	<ul style="list-style-type: none"> ▪ FPRW

Although there are several inconsistencies in the results frameworks, PMP format, and indicators, the SC F&BS project and BWB program meet many of the MPG criteria for project design and PMP. The ILO F&BS project meets some of the criteria. The project would benefit from a reorganization of the project logic model and RF, restating the intermediate objective in concrete terms, and developing more precise indicators to measure the objective and outputs. The FPRW project design and PMP met very few of the MPG criteria including the RF, indicators, and PMP.

3.2. Relevance and Strategic Fit

The following section is organized according to an overview of key stakeholders for the USDOL-funded projects and the needs and expectations of these stakeholders. This section specifically addresses to what extent the USDOL projects address the priorities and needs of stakeholders in the RMG sector. In addition to current and past USDOL-funded projects, this section includes options and ideas for new USDOL programming for the RMG sector.

Overview of Key Stakeholders

Table 8 shows the primary stakeholder for the USDOL-funded projects along with a description of the relationship between the stakeholders and the four projects.

Table 8: Key Stakeholders and Relationships to USDOL Projects

Stakeholders		Relationship to USDOL Projects
Government of Bangladesh	Ministry of Labor & Employment (MOLE) The Department of Labor and Chief Inspector of Factories and Inspections (DIFE) Directorate of Labor (DL) Bangladesh Export Processing Zone Authority (BEPZA) Fire Services Civil Defense (FSCD) Ministry of Housing and Public	MOLE is the primary government stakeholder for the USDOL-funded projects. DL and DIFE are two key departments within MOLE. The FPRW project helped DL develop an online union registration system and, through FMCS, trained DL staff on IBN. FPRW also trained BEPZA inspectors and compliance officers on IBN. The ILO F&BS project is training DIFE inspectors while BWB intends to collaborate with the inspectors on BW compliance standards in the near future. The ILO F&BS project also trains FSCD and RAJUK on fire and

	Works (RAJUK)	building safety standards and procedures.
Trade Unions	National Co-ordination Committee of Workers Education (NCWEE) Industrial Bangladesh Council (IBC)	The FPRW trained NCWEE and IBC officers in IBN. The project also trained union organizers from their member federations in labor rights and organizing principles.
Employers' Associations	Bangladesh Employers Federation (BEF) Bangladesh Garment Manufacturers and Exporters Association (BGMEA) Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA)	The FPRW project trained BEF, BGMEA, and BKMEA on IBN. The ILO F&BS project trained BGMEA and BKMEA on fire and building safety standards and both ILO and SC F&BS projects coordinate with these employers' associations. BGMEA and BKMEA will serve on the BWB project advisory committee.
Engineering Institutions	Bangladesh University of Engineering and Technology (BUET)	BUET has played a key role in F&BS initiatives by helping to establish inspection standards and train local institutions and consultants. The ILO F&BS project coordinates closely with BUET.
Factories		The SC F&BS project is training union organizers and leaders in approximately 150 factories that have functioning unions. The project also plans to conduct joint training for union leaders and factory managers. BWB is currently working with 78 factories in preparation for compliance assessments.
Brands		BWB is working with 17 brands. The brands have helped convince their suppliers to participate in BWB and intend to purchase the compliance assessment reports.
Brand F&BS Initiatives	Accord on Fire and Building Safety (Accord) Alliance for Bangladesh Worker Safety (Alliance)	Accord and Alliance are the two major brand initiatives focused on building inspections and remediation efforts. Accord has designated \$50 million over five years to conduct inspections and remediation activities in 1,300 factories. Alliance, on the other hand, is targeting approximately 1,000 factories (800 inspected to date). The Alliance director was unwilling to provide the evaluator with the amount of funds it has allocated to its inspection and remediation efforts. These two initiatives collaborate closely with the RMG Program's building inspection component that is managed by ILO F&BS Chief Technical Advisor (CTA).

Stakeholders' Needs and Expectations

The evaluator conducted a range of interviews with the stakeholders of the four USDOL-funded projects to determine the extent to which they believe the projects are meeting their needs and expectations. Interestingly, nearly all of the stakeholders interviewed told the evaluator that USDOL should focus its efforts on getting the GSP trade benefits for Bangladesh reinstated and expanded to the RMG sector. Government, employer, and trade union officials explained that GSP eligibility for the RMG sector would increase employment and grow the economy. However, a USDOL representative made it clear that USDOL does not have the authority to reinstate or expand GSP for any country or sector. According to the GSP Guidebook, The

President determines which countries and which products are eligible for GSP benefits based on the recommendations of the U.S. Trade Representative (USTR). The GSP subcommittee, chaired by USTR, conducts annual reviews of GSP product and country eligibility. These reviews typically involve both public hearings and a public comment period. Based on the public review process, countries and products can be removed or added by executive order, or Presidential Proclamation.¹⁰

Government of Bangladesh

FPRW assisted the DL to develop an online union registration system consisting of the trade union registration process and a mechanism to register complaints regarding unfair labor practices. The online registration system was launched in March 2015. The Joint Secretary told the evaluator that the union registration support was both timely and valuable and that the online registration is functioning. However, he acknowledged that his staff is overwhelmed and require more training and both technical and financial support to manage the union registration system effectively.

The US Embassy labor attaché told the evaluator that trade unions that have recently tried to register online have been asked to submit paper copies of their registration. The SC director also told the evaluator that of 17 unions that he knows that tried to register online, five successfully registered, eight were rejected, and three are pending. He added that from the unions' perspective, the online registration system has added layers of bureaucracy because now unions must scan copies of the online registration forms and submit hard copies to the DL. In addition, the acceptance or rejection letter is sent to the union rather than publishing it online.

According to the Fundamental Rights and Labor Relations (FRLR) project staff (former FPRW staff), trade unions have the option to register online or manually as stipulated in the BLA Labor Rules 2015 but the DL requests the original application in hard copy as supporting documentation. The FRLR project intends to provide more training and support to the DL so it can more effectively manage the online registration system.

Under FPRW, the FMCS provided training to the DL and BEPZA on IBN. During the FPRW midterm evaluation, the DL and BEPZA managers opined that the IBN training was highly relevant and would prove to be a useful tool in dispute resolution negotiations. However, the FPRW final evaluation discovered that the IBN was not relevant to many dispute resolution situations between management and workers. BEPZA managers told the evaluator that the IBN approach of getting the negotiating parties to make concessions to reach compromises does not work with the Worker Welfare Associations. The BEPZA director told the evaluator that the associations do not want to compromise and opined that a different negotiation tool should have been used.

The ILO F&BS project is providing training to DIFE labor inspectors and the FSCD firefighters. During a focus group discussion, FSCD firefighters expressed appreciation for the training on fire and building safety. They noted that it was highly relevant and helped improve the quality of

¹⁰ <https://ustr.gov/sites/default/files/GSP-Guidebook-July-2015.pdf>

the inspections but recommended it be adjusted to include hydrant and water calculation, sprinkler system assessments, high-rise safety, chemical storage, and hazardous materials management. Apparently, the Director General of FSCD told the project's Chief Technical Advisor (CTA) that improved inspections have reduced the number of fires. The Joint Secretary of DIFE told the evaluator that the fire and building safety training for the labor inspectors has also helped improve the quality of the labor inspections. However, the evaluator was unable to empirically prove or disprove these statements.

Trade Unions

FPRW provided training on IBN to NCWEE and IBC as well as training for the union organizers affiliated with their member federations. NCWEE and IBC representatives told the evaluator that the IBN training, although interesting, proved to be difficult to use during negotiations. They commented that the problem was convincing trade union representatives to concede certain demands in order to effectively negotiate and arrive at a "win-win" situation with factory management. On the other hand, they said that the union organizer training was valuable in helping the organizers communicate labor rights to workers and form unions. It should be noted, however, that NCWEE only has one member federation in the RMG sector. Furthermore, one of the criticisms that surfaced during the FPRW midterm evaluation was that the project was training federation officials and union organizers that were not involved in the RMG sector or that were not actively organizing unions. FPRW addressed this criticism after the midterm evaluation by requiring trade union training participants to have an active and functioning trade union in the RMG sector.

The SC F&BS project is working closely with seven federations that belong to IBC. The project is training union organizers and leaders at the factory level in fire and building safety issues. During focus group discussions, the union organizers and leaders expressed appreciation for the training. They told the evaluator that the training was highly relevant in light of the industrial accidents in 2013. Many of the union leaders told the evaluator that the training enabled them to identify fire hazards in their factories and, in many cases, convince management to resolve the hazards. These included overloaded circuit boxes, bare wiring, non-functioning fire extinguishers, and blocked fire escapes. Several union leaders, however, recommended that labor rights, such as the right to organize and bargain as well as occupational safety and health rights, be included with the fire and building safety training for both management and workers.

Employers' Associations

FPRW, through FMCS, provided IBN training to BEF, BGMEA, and BKMEA. During the midterm evaluation, the evaluator interviewed compliance managers and inspectors from these three associations. Nearly everyone that was interviewed opined that IBN would be a highly effective tool to resolve disputes. During this evaluation, as was the case with the DL and BEPZA, representatives of the employers' associations told the evaluator that the IBN training did not prove to be as relevant and useful as they initially hoped. Managers from BGMEA and BKMEA noted two problems. One was that the IBN training focused too much on examples and situations in the United States instead of Bangladesh. The second was that FPRW was supposed to have provided follow up training as well as coaching and mentoring during actual

negotiations. According to these managers, the follow up to the IBN training did not occur for reasons unknown.

The ILO F&BS project maintains a relationship with the employers' associations that is largely one of coordination and dissemination of information and communication. BGMEA and BKMEA representatives have participated in fire and building safety training. In interviews, the employers' associations told the evaluator that the ILO F&BS project is playing an important role in training FSCD and DIFE labor inspectors on fire and building safety. They believe the training is meeting important needs in the RMG sector. In theory, the employers' associations should be participating on the BWB project advisory committee (PAC) along with government and trade union representatives. The PAC, however, is currently being formed so the participation of employers' associations in BWB has been minimal. In fact, the associations told the evaluator that they have had minimal contact with BWB even though some of their member factories are participating in the BWB program. They said they would like to have more information and determine how they could be involved.

RMG Factories

Factories are primary stakeholders for the ILO and SC F&BS projects and BWB. The ILO F&BS project trains inspectors that inspect the factories to assess fire and building safety risks. The SC F&BS project trains trade union organizers and leaders to identify potential risks and how to present them to management. Eventually, the SC F&BS project will conduct joint training for union leaders and managers on fire and building safety. BWB is currently working with 78 factories on factory self-assessments and life skills training for workers. The project intends to begin the formal factory compliance assessments once the BLA labor rules are published.

The evaluator was able to interview two factories where SC is conducting fire and building safety training for union leaders and two factories that are participating in BWB. Factory managers in all four factories believe these projects are meeting important needs. The managers of the factories where union leaders have been trained told the evaluator that training workers in fire and building safety is an important initiative that makes the factory safer and can prevent accidents. They assured the evaluator that when the union leaders identify fire hazards; the factory addresses the risks immediately. They also recommended that factory managers participate alongside union leaders in future trainings.

Factory managers of those factories participating in BWB told the evaluator that the self-assessment process has been useful. Furthermore, factory managers told the evaluator that they expect that the number of audits will be reduced because the BW participating brands accept the BW compliance assessment in place of their own audits. This should result in a cost savings for the factories. For example, the compliance officer at Sterling Styles Limited told the evaluator that he expects the number of audits to decrease from 15 to seven that represents a savings of approximately \$8,000.

RMG Brands

The brands are the other primary stakeholder for BWB. There are 17 brands that are BWG partners and another 75 brands that will likely participate in BWB and eventually buy the

compliance reports. The brands are also instrumental in encouraging their suppliers to participate in BWB. The evaluator interviewed the compliance and corporate social responsibility officers for The Children’s Place and H&M. They told the evaluator that they found out about BWB from their corporate headquarters. Based on what they know about the project, they believe that BWB has the potential to improve factory level compliance with ILS and national labor laws and reduce the number of audits. However, representatives from both companies admitted that it is too early to assess the effectiveness of the BWB program. The representatives from H&M, which has its own internal auditing function, told the evaluator that it would continue to conduct its own audits using the Higg Index¹¹ given the risk of operating in Bangladesh.

Brand F&BS Initiatives

The Accord on Fire and Building Safety (Accord) and the Alliance for Bangladesh Worker Safety (Alliance) are the two brand supported F&BS initiatives. Accord has 205 brand signatories from Europe, Canada, and the United States. Alliance, on the other hand, has 26 signatories from the United States, Canada, and Australia. Both initiatives focus on the inspection of factories that supply the brands’ signatories. To date, Accord has supported the inspection of 1,300 factories while the Alliance has supported nearly 800 factory inspections. These are first-time inspections and do not include follow-up visits.

The ILO F&BS project coordinates and collaborates with Accord and Alliance on building inspections. It should be noted that the ILO RMG Program supports the building inspections with funds from DFID, CIDA, and the Kingdom of the Netherlands. The building inspection component of the ILO RMG Program is actually managed by the CTA of the ILO F&BS project. He provides the following management services to the RMG Program:

- Oversees approximately 1,500 F&BS inspections
- Manages the F&BS inspection team
- Manages a team to develop and upload inspection reports to DIFE website
- Provide technical input to National Tripartite Committee
- Formulate post-inspection follow-up actions (i.e. engineering studies, remediation)
- Oversee RMG Program F&BS sub-contracting process
- Participate on the ILO procurement committee
- Serve as acting ILO RMG program manager when the program manager is away
- Oversee procurement of F&BS equipment for BFSCD under RMG Program

The executive directors for Accord and Alliance told the evaluator that the building inspections conducted under the RMG Program are playing a critical role in providing inspections for those factories that do not supply their brand signatories.

¹¹ The Higg Index, which was developed by the Sustainable Apparel Coalition, is an apparel and footwear industry self-assessment standard for assessing environmental and social sustainability throughout the supply chain.

New Programming Options

The evaluator asked stakeholders, based on their knowledge of the RMG sector, what future investments USDOL might make to address needs as well as opportunities in the sector. Table 9 summarizes the potential investments, the most likely implementing organization, and the government partner. Capacity building for the DL on ILS was the most commonly mentioned investment followed by capacity building for DIFE on labor inspections and the new OSH committees. Many of the stakeholders also mentioned the need to create more awareness of ILS and labor rights among both employers and workers.

The next most frequently mentioned investment concept was capacity building for BEPZA on ILS, dispute resolution, and OSH. The stakeholders, including the SC, thought the democratization of the Worker Welfare Associations could be strengthened in the process of these capacity building interventions. Stakeholders also noted the need to continue to work on BLA 2006 to bring it more in-line with ILS. A few stakeholders opined that USDOL might invest in capacity building for RAJUK that intends to hire new inspectors.

Table 9: New USDOL Programming Options: Potential Investments, Implementing Organizations, and Partner Institutions

Potential Investments	Implementing Organization	Partner Institution
Capacity building for DL on ILS that might include union registration and information, management-worker relations, grievance mechanisms, and dispute resolution.	US Embassy	DL
Capacity building for DIFE labor inspectors and OSH committees on factory labor and OSH compliance. Might collaborate closely with BWB and help DIFE establish an OSH unit at DIFE to sustain these efforts.	ILO/BW	DIFE
Labor rights awareness and education for employers and workers. However, this concept would only work with factories where there are active unions, which makes IBC the natural union partner. The employer partners might include BEF but would most certainly include BGMEA and BKMEA.	ILO	IBC/BEF
Focus on creating more awareness within BEPZA of ILS by building capacity of industrial relations officers to address and manage disputes and OSH issues. Also, democratize the Worker Welfare Committees.	SC or ILO	BEPZA
Strengthen the BLA 2006 amendments and rules so they are more in-line with ILS. For example, more focus on administrative requirements, reporting requirements, clarifying collective bargaining rights (who can bargain), and termination of workers.	ILO	MOLE/TCC
Capacity building for RAJUK building inspectors to be able to conduct effective inspections. Capacity building might focus on regulatory frameworks, codes, and identification and remediation of risks.	ILO	RAJUK

3.3. Progress and Effectiveness

This section examines the effectiveness of the USDOL-funded projects to determine whether they are achieving their stated objectives. It also assesses the synergies between the USDOL projects and other labor projects being implemented in the RMG sector.

Achievement of Indicator Targets

The following section examines the performance of the USDOL-funded projects by analyzing the achievement of the indicator targets. It should be noted that the FPRW project ended in July 2015 and is, therefore, no longer operational. It should also be noted that the other three projects have experienced delays due to late starts and political unrest that have affected the achievement of indicator targets. The project managers also told the evaluator that some of their activities have been on hold until the MOLE publishes the BLA 2006 labor rules.

FPRW

The evaluator found it difficult to assess the achievement of the FPRW indicator targets because the project did not have an adequate PMP. At the time of the midterm evaluation, FPRW did not have a PMP with indicators to measure the achievement of the intermediate objectives and outputs. Based on the midterm evaluation recommendations, the project developed a set of indicators. However, the FPRW final evaluation found the indicators to be inadequate to accurately measure project performance.¹² The achievements and impact of the FPRW project is discussed in detail under the impact section of this report.

ILO F&BS Project

As discussed in the project design section, several of the indicators listed in the project document, PMP, and data-tracking table vary among these documents. In consultation with the CTA, the evaluator decided to use the indicators and their targets in the data-tracking table. The following table provides a summary of the achievement of indicator targets for the intermediate objective and five outputs.

Table 10: An Assessment of ILO F&BS Project Performance

Intermediate Objective	
F&BS laws and regulations enhanced and consistent with international standards and best practices	The principal indicators used to assess this objective are the number of structural and fire safety inspections and percent of factories with safety management plan. The original targets for structural and fire safety inspections are 1,708 and 1,827, respectively. The targets were recently revised and set at 1,500 to be completed by the end of October 2015. The project reported that 1,326 inspections have been completed at the time of this evaluation. This represents 88% of the revised target. The project had not reported any factories with safety management plans. It should be noted that, although the project is

¹² International Labor Organization, “Final Evaluation of the Promoting Fundamental Principles and Rights at Work Project in Bangladesh”, Nycander, Lotta; Islam Khairul, June 2015.

	not directly funding the inspections, the project decided to add indicators for the numbers of inspections conducted to reflect the collaboration with the RMG Program. For example, the CTA is spending considerable time managing the RMG Program inspections.
Outputs	
1. F&BS regulatory framework upgraded and coordinated	The indicator for this output is “ <i>progress made on upgrading the regulatory framework and the number of institutional partners accepting standards.</i> ” As noted previously, this is a weak indicator because it does not measure tangible aspects of an upgraded regulatory framework. The project’s data-tracking table notes that, to date, the project has played an important role in getting engineers from Accord, Alliance, and the NI to agree on safety standards for brick, stone, and aggregate. The tracking table does not show progress on “ <i>recommendations for building permits and checklists for inspectors,</i> ” which are the targets. The table does, however, show that the project achieved its target of six institutional partners accepting standards.
2. Labor inspection F&BS procedures/tools upgraded	The project set a target of developing and distributing 400 F&BS toolkits to labor inspectors. To date, the toolkits have not been developed. However, the CTA assured the evaluator that the toolkits will be developed and distributed and the appropriate inspectors trained by the end of the project.
3. Capacities of government building inspectors strengthened	The indicator targets are 250 inspectors trained in F&BS and 100% able to demonstrate improvement in skills. The data-tracking table shows that the project has trained 188 inspectors of which 24 are female. The table does not show any percentages for the demonstration of F&BS skills. The evaluator conducted interviews with 10 FSCD inspectors to assess what they learned during the training courses. These 10 inspectors demonstrated a deep and thorough understanding of F&BS training course content. It is not clear whether the other 178 FSCD inspectors have the same grasp of the course content.
4. Efficient and timely building inspections by government	The indicator targets for this output include building inspection plans, 1,400 inspections conducted that follow the inspection plans and that apply the F&BS procedures and tools (Output 2), and percent of inspections that result in remediation. The data-tracking table shows that 351 inspections were conducted but they were conducted without the building inspection plans and the F&BS toolkits because they have not been developed. In addition, the table does not show a result for inspections that result in remediation. This information was not available at the time of the evaluation.
5. F&BS data-tracking system available and functioning	The indicator for this output is a data-tracking system that is functioning and that has been transferred to DIFE. The project intends to develop the system within FSCD. The data-tracking table shows that the tracking system is being developed in collaboration with the RMG Program and that discussions are still underway. The ILO F&BS project is providing funding for the part of the data-tracking system in will report on. Based on the timeframe in the table, the systems should have been operational by now.

SC F&BS Project

The SC F&BS project design consists of three intermediate objectives and 25 output and outcome indicators. Table 11 shows the indicators, organized by the corresponding intermediate objective, along with the end of project indicator targets and actual achievement to date. The project, which started in September 2013 and is scheduled to end in September 2017, is approximately 50% complete.

The table clearly shows that the project has focused primarily on the first intermediate objective. It has developed and printed the F&BS training curricula and materials, distributed the materials to federations, and trained union organizers and leaders on F&BS issues. The evaluator conducted focus group discussions with union organizers and leaders that participated in the training. The organizers and leaders were able to explain the certification course topics and the key learning points under each topic (i.e. electrical risks, use of fire extinguishers, rescue, first aid, building structural safety, and so forth).

The project is achieving five of the indicators as planned but is slightly behind its targets for the number of certification trainings and F&BS events attended (36% and 30%, respectively). It is more significantly behind on mentorship meetings (19%).

Table 11: An Assessment of the SC F&BS Project Performance

Indicators	Total Target	Total Actual	Percent
IO 1: Improve the capacity of workers to engage with GOB and employers on F&BS			
# curricula developed	1	1	100%
# curricula materials printed	300	146	49%
# union federations utilizing curriculum to educate workers	5	10	200%
# worker resource people trained	280	136	49%
# certification trainings	14	5	36%
# workers/worker org. staff successfully completing certification	280	126	45%
# mentorship meetings conducted	200	38	19%
# fire and building safety initiative events attended	20	6	30%
IO 2: Improve knowledge of workers on F&BS, inspections, reporting procedures, and mediation			
# factories where local unions engage with management	70	23	33%
# training conducted in the workplace	30	0	0%
# participants trained	1,500	0	0%
# fire/building safety training materials produced	5,000	0	0%
% training participants with improved knowledge of FB&S reporting	80%	0	0%
# factory union leaders and fire safety committees trained on reporting hazards to factory managers and GOB	60	0	0%
# reports submitted to factory managers and/or GOB	50	0	0%
IO 3: Improve workers' organizations capacity to represent workers on F&BS matters to ensure rights			
# trainings conducted in unorganized or newly organized workplaces	40	0	0%
# participants trained in unorganized or newly organized workplaces	2000	0	0%
# additional training materials printed	1000	0	0%
% training participants with improved knowledge of FB&S reporting	80%	0	0%

# certified worker leaders engaged in workers representation activities	280	126	45%
# agreements with enhanced fire and building safety language	10	8	80%
# individual workers represented through legal cases	15	10	67%
# instances management or GOB addressed worker reports on workplace hazards	45	20	44%
% addressed worker reports resulting in remediation of hazard	40%	53%	133%
# functioning fire safety committees	0	0	0%

On the other hand, the project has made less progress on the second intermediate objective. While it is reporting that management engaged with unions in 33% of the factories, the project has not made progress on the other five indicators under this objective. The project manager explained that SC has had difficulty to convince factories to allow workers and managers to participate in joint F&BS training. In some cases, the project was competing with Accord and Alliance training activities and in other cases the factory did not want to give managers and workers time off to participate because it would affect production. The SC Country Director told the evaluator he thought the organizations providing training could do a better job of coordinating so factories would not be overwhelmed.

Regarding the third intermediate objective, the project has made progress on about half of the indicators. While it has not made progress on training of unorganized or newly organized workplaces, it has realized important advancements in engagement with factories, incorporating F&BS language in agreements, and legal representation for workers. Trained union leaders have also been somewhat successful in convincing factories to address fire safety risks, which is consistent with what the evaluator discovered through focus group discussions with union leaders and visits to factories. Nevertheless, the SC Country Director opined that if the SC fire and building safety training is to be fully effective, laws must be enforced and fines issued to factories that are not in compliance with the laws.

BWB

The BWB project design consists of four intermediate objectives and 36 outcome and output indicators. Table 12 provides an overview of the progress in achieving the indicator targets. The analysis is organized by intermediate objective.

Table 12: An Analysis of BWB Performance

Intermediate Objective	Analysis
BWB operational and able to address issues of scale	This objective focuses largely on establishing the BW program in Bangladesh and recruiting the factories and brands. The project is operational including six Economic Advisors (EAs). It is in the process of hiring an additional six EAs. The project has also convinced 78 factories to participate in BWB that include more than 120,000 workers. There are approximately 4,500 factories that employ an estimated 4 million workers in the RMG sector. It should be noted, however, that BWB decided to reduce the target for factory enrollment from 300 to 225 in order to focus on quality of services. BWB targeted 18 buyer partners to participate and has achieved 17 to date. It is also working with 75

	buyer participants. ¹³
BWB's services a driver of change towards higher compliance with national labor law and ILS	<p>This objective focuses largely on the BW compliance assessment, advisory services, and training. Indicator target achievement is mixed. BWB is in the process of working with the 78 factories to conduct self-assessments. In addition, it has conducted six compliance assessments but is waiting for the BLA 2006 labor rules to be published before the compliance assessment reports are completed and shared with factories and their brands. The EAs have identified potential problems that include PICCs being appointed rather than elected by workers and factory managers coaching workers before being interviewed by EAs and requesting that interviews be conducted behind closed doors.</p> <p>BWB has aspired to conduct 480 advisory visits in 2015 but has only achieved 80 due primarily to the late start-up and political turmoil. On the other hand, it had planned to have 30% of the factories participating in training events and has achieved nearly 65%. It has not achieved targets for quality assurance visits to factories or the 1st synthesis report, which is dependent on the compliance assessment reports. The compliance assessment reports, in turn, are on hold until the BLA 2006 amendments labor rules are published.</p>
Appropriate mechanisms to reach impact beyond the factory level are in place	The indicators for this objective include policy change, decisions taken by the PAC, and the impact surveys. The project has not yet focused on policy and the PAC is still being established. It is not clear what progress has been made on the impact surveys. The evaluator requested but did not receive an update.
BWB has prepared the ground for moving towards financial, institutional and political viability	BWB is not reporting any progress on achieving the sustainability indicator targets for this objective. However, the evaluator believes that sustainability should be addressed early in the project rather than waiting until year three. It should be noted that BWB has decided not to charge factories for services as part of its promotional strategy.

Synergies with Other Programs

The portfolio of USDOL-funded projects have created some interesting synergies with other labor projects that, in the opinion of the evaluator, increased their effectiveness. These are discussed below for each of the four projects.

FPRW

The FPRW midterm evaluation documented several important synergies it created with other projects. For example, FPRW and BWDP collaborated on the amendments to BLA 2006 and fire safety video production and distribution. Furthermore, having the two projects in place when the Tazreen Fashion fire and Rana Plaza building collapse occurred, allowed the ILO to provide a timely response. In fact, these industrial accidents created a sense of urgency and an opportunity

¹³ According to the Better Work Global, a buyer partner signs an agreement with Better Work and makes certain commitments such as reducing duplicative audits and remediation plans. In return they receive an enhanced level of service and other benefits at national, regional and global levels. A buyer participant, on the other hand, is global retailers that subscribe to Better Work factory reports in one or more country programs.

for FPRW to address fire safety in the workplace that laid the groundwork for the RMG Program as well as the ILO F&BS project.

FPRW also inspired the FRLR project. In March 2013, the Norwegian Embassy in Dhaka approached the ILO to discuss ways in which it could support workers' rights and labor relations. Based on these discussions, the Embassy asked the ILO to develop a one-year proposal for \$2.5 million that was subsequently expanded and extended. The FRLR interventions are based primarily on the FPRW interventions and experiences. Furthermore, the FPRW and FRLR projects have provided the foundation for a new project focused on industrial relations that the ILO is currently developing. The governments of Denmark and Sweden have agreed to provide \$7.4 million to the ILO to implement the project.

ILO F&BS Project

The ILO F&BS project collaborates closely with the ILO RMG Program. The RMG Program has five components that include fire and building safety inspections, strengthening fire and building inspection capacity, occupational safety and health, rehabilitation and skills for victims of the Rana Plaza building collapse, and the Better Work Bangladesh program. The ILO F&BS project provides management oversight to the RMG Program for the components on fire and building inspections and inspection capacity strengthening. The evaluator believes that the close collaboration has created efficiencies and helped increase effectiveness. At the same time, the two projects are so closely intertwined that the relationship could present a problem in terms of compliance with the cooperative agreement. This issue is discussed in detail under Section 3.5 on management arrangements.

In addition to the RMG Program, the ILO F&BS project collaborates and coordinates with the Accord and Alliance initiatives that have increased effectiveness. The CTA, who provides management oversight to the RMG Program's fire and building inspection and inspection capacity strengthening components, coordinates closely with Accord and Alliance on building inspections and fire and building safety training. According to the CTA, the close collaboration and coordination have resulted in reaching agreements on engineering standards for structural safety as well as avoiding the duplication training efforts. The executive directors of Accord and Alliance echoed this comment during interviews.

SC F&BS Project

In 2011, the Solidarity Center received a \$37 million grant from USAID to implement the Global Labor Program (GLP) that included an allocation of \$2,784,114 for union capacity building activities in Bangladesh. During the FPRW midterm evaluation, the SC director explained to the evaluator how the SC was able to build the capacity of the factory level trade unions and, in the process, build trust and confidence. The SC F&BS project has leveraged these capacity building efforts and relationships with the trade unions to launch its training activities. The evaluator believes that the work done with trade unions under the USAID GLP laid the foundation for the fire and building safety training that has contributed to its effectiveness.

The SC F&BS project also collaborates and coordinates with Accord, Alliance, and the ILO RMG Program including the USDOL-funded ILO F&BS project. While the collaboration

typically consists of sharing information and attending training events that may indirectly contribute to increased effectiveness, there is evidence of direct benefits. For example, the FSCD provides expert trainers to the project for the fire and building safety training for union organizers and leaders. The FSCD trainers were trained by the ILO F&BS project.

BWB

BWB, which initiated activities in November 2014, has been focused primarily on establishing operations, recruiting factories and brands, and assisting factories with self-assessments. It is too early to identify synergies between BWB and other projects that have increased effectiveness. Nevertheless, the evaluator believes that there are a variety of interesting opportunities to create synergies. For example, BWB might incorporate fire and building safety training in its repertoire of training courses for workers, managers, and labor inspectors. In doing so, it would obviously need to collaborate with the ILO and SC F&BS projects. BWB might also collaborate with the new ILO industrial relations project to provide dispute resolution and mediation training services to workers, managers, and inspectors. And finally, BWB might coordinate with Accord, Alliance, and the ILO RMG Program to determine how to address fire and building safety issues during the compliance assessments.

3.4. Efficiency and Resource Use

This section addresses the cost-effectiveness of the USDOL-funded projects. Evaluators typically use cost-benefit and cost-effectiveness analyses to assess efficiency. Cost-benefit analysis determines the cost to achieve an impact that can be compared to standards or similar projects. Cost-effectiveness analysis examines and compares the efficiency of different interventions in achieving impacts or outcomes.

The evaluator was not able to use cost-benefit or cost-effectiveness analyses because the projects do not share common impact indicators or interventions and outcome indicators that would allow comparison. Furthermore, the evaluator did not have access to cost and benefit standards to be able to compare to other projects. Instead, the evaluator conducted analyses of the output budgets to determine the cost to produce each output and assessed these costs against indicator achievement. This analysis should provide a general idea of project efficiency in terms of indicator achievement.

Output Budget Analysis

FPRW and the ILO and SC F&BS projects developed output-based budgets. The FPRW and ILO F&BS project budgets allocate funds to each output, which are essentially direct costs. In addition, the budgets include amounts budgeted for management, administration, and other indirect costs. To calculate the cost for each output, the evaluator distributed the indirect costs among the outputs and added these amounts to the direct cost for each output. In the case of the SC F&BS project, the indirect costs were already allocated among the outputs. The BWB budget, on the other hand, does not have an output-based budget.

While the budget output analysis shows the amount that USDOL is paying for each output, it does not compare it to the other projects or a standard. Thus, the analysis is unable to determine

whether the output and its effects are cost-effective. It does, however, provide USDOL an accurate accounting of what it pays for outputs among the various projects it funds in Bangladesh.

Table 13 shows the 10 outputs for the FPRW project, their targets, the estimated cost for the output, and the unit cost for the output target. The table also shows whether the output was completed or not. The first output was the diagnostic study that informed the design of the FPRW project. Since it was actually paid for from another source of ILO funds, it is not included in the analysis.¹⁴

The national action plan, the revised BLA 2006, the union mapping exercise, and the MOLE online union registration system were completed. However, USDOL paid nearly \$700,000 for these three outputs that have had questionable effects on the labor situation. For example, the ILO believes the amendments made to the BLA 2006 fall short of its recommendations to bring the law into conformity with ratified ILS. The union mapping exercise, on the other hand, was significantly delayed and never published because the findings were considered highly sensitive by the union federations. The project launched the online registration system in March 2015 and is noted by the project as a completed and sustained output. However, trade unions that have tried to use the online registration believe it has added layers of bureaucracy that has made the registration process more cumbersome.

Table 13: Output Budget Summary for the FPRW Project

Outputs	Target	Cost USD	Unit Cost USD	Status
1. Diagnostic assessment and report	1	-	-	Completed
2. National plan of action	1	103,717	103,717	Completed
3. Draft law which is more in conformity with ILS	1	214,979	214,979	Completed
4. Trade union mapping and needs analysis	1	180,839	180,839	Completed
5. Improved MOLE union registration system	1	172,973	172,973	Completed
6. Trade union capacity building program and outreach program on labor rights and responsibilities (2 outputs)	3,243	368,568	114	Incomplete
7. Functioning anti-union discrimination complaints mechanism	1	125,717	125,717	Incomplete
8. Labor-management training program	183	438,398 ¹⁵	2,395	Incomplete
9. Bi-partite enterprise level agreements	N/A	100,148	-	Incomplete

The rest of the outputs were not fully completed. While the project trained more than 3,000 union members on labor rights, training of trainer principles, and union organizing, there is no

¹⁴ An ILO team from Geneva conducted the diagnostic study in May 2011 before USDOL allocated funds for the FPRW project.

¹⁵ The \$438,398 consists of \$228,900 allocated to FMSC by USDOL as part of the IAA and \$209,498, which is the estimated cost to FPRW. This amount consists of workshop expenses and management time.

evidence that shows that the training resulted in more registered unions. The project was not able to develop an anti-union discrimination complaints mechanism, establish an effective labor-management training program, or achieve bi-partite enterprise level agreements. USDOL invested approximately \$1.2 million on these four outputs. These obviously were not cost-effective investments.

Table 14 shows the output budget analysis for the ILO F&BS project. Nearly \$270,000 has been budgeted for upgrading the government’s fire and building safety framework. The project intends to develop and distribute 400 copies of F&BS inspection toolkits to FSCD and labor inspectors. The total anticipated cost is \$221,840 while the unit cost is \$555. In addition, the project intends to train 250 labor inspectors and other relevant staff to build their capacity to conduct fire safety inspections. The total cost is estimated to be \$439,340 or \$1,717 per person trained.

Table 14: Output Budget Summary for the ILO F&BS Project

Output	Target	Cost USD	Unit Cost USD
1. F&BS regulatory framework upgraded and coordinated	1	269,840	269,840
2. Labor inspection F&BS procedures/tools upgraded	400	221,840	555
3. Capacities of government building inspectors strengthened	250	429,340	1,717
4. Efficient and timely building inspections by government	1,400	336,840	241
5. B&FS data-tracking system available and functioning	1	242,140	242,140

The fourth output is focused on conducting effective fire safety inspections. The target is 1,400 inspections at a total cost of \$336,840 or \$241 per inspection. The fire and building safety-tracking system is expected to cost \$242,140, which seems expensive to the evaluator.

The cost-effectiveness of these outputs will depend, in part, on whether the planned output targets and outcomes are achieved. Nevertheless, USDOL might consider the following questions: Is an upgraded fire and building safety regulatory framework worth \$270,000? Is a fire safety toolkit worth \$555 and does it really cost \$1,717 to train one labor inspector in fire safety inspection procedures? Is the fire and building tracking system worth \$242,140? Are there more cost-effective options to achieving these outputs?

Table 15 shows the seven outputs, their targets, total costs, and per unit cost for the SC F&BS project. The outputs are essentially all related to training and capacity building. The development of the F&BS curriculum is \$132,000, which includes staff time and printing costs for 300 copies. Nevertheless, the \$132,000 price tag for the curriculum seems high to the evaluator.

Table 15: Output Budget Summary for SC F&BS Project

Output	Target	Cost USD	Unit Cost USD
1. Develop fire and building safety certification curriculum	1	132,731	132,000

2. Certify factory-level union leaders and worker organization staff in F&BS	240	173,462	723
3. Provide technical and mentorship support to worker organization staff on F&BS	200	133,746	669
4. Conduct 30 joint (worker/employer) workplace trainings for 50 participants each	1,500	156,272	104
5. Provide mentorship and technical assistance on F&BS for committees and union leaders	500	135,980	272
6. Worker organizations expand outreach to unorganized or newly organized workplaces	2,000	136,916	68
7. Build capacity of certified worker leaders to represent workers on F&BS issues	280	130,892	467

The unit cost of the rest of the outputs varies depending on the target value. In other words, where the target number is high, the unit cost is reasonable. This is the case for outputs four, five, and six. On the other hand, where the output target values are lower, the unit cost is higher and appears expensive. This is the case for outputs two, three, and seven. Since the cost of each output includes fixed costs (i.e. management salaries, rent, utilities, and overhead), the unit price can be reduced by increasing the target value (i.e. the number of people trained).

The BWB does not have an output-based budget. Therefore, the evaluator was not able to conduct a thorough analysis of outputs and their total and unit costs. Instead, he calculated the cost to provide the range of BW services for each factory expected to participate in the project. He also calculated the cost per worker based on the anticipated number of workers in the targeted factories. These are two of the most important outputs under the second intermediate objective, which is providing BW compliance-related services to factories and the reports to the brands.

BWB initially intended to enroll 300 factories in the BW program by 2016. The CTA later reduced the target to 225 because he thought 300 factories was too ambitious and might affect the quality of BW services. BWB estimates that the 225 factories employ 450,000 workers. The BWB budget is currently \$6.6 million.

Table 16 shows the per factory cost of the BWB program as well as the per worker cost. The average cost per factory is \$29,424 while the average cost per worker is \$15 based on the project's life cycle of three years (2014-2016). The costs include three factory self-assessments, three formal compliance assessments, three compliance reports, on-going advisory services, and trainings to address non-compliance issues. The assessment and on-going advisory services consist of about 10 factory visits per year. Ultimately, these services are intended to improve factory compliance with ILS and national labor laws and benefit workers.

Table 16: Total and Unit Costs for Selected Outputs for BWB

Output	Target	Cost USD	Unit Cost USD
Number of Factories in BWB	225	6,620,316	29,424
Number of Workers in BWB	450,000	6,620,316	15

The use of the revenue generated by factory subscriptions and the sale of reports to brands should be taken into consideration. The evaluator estimates that BWB would generate between \$600,000 and \$800,000 per year from the subscriptions and sales of reports. If BWB decides to use this revenue to provide services to the 225 factories, the cost would increase to between \$32,100 and \$32,900 per factory. On the other hand, if the project decided to replace donor funds with the revenue, the cost to donors would decrease to between \$26,700 and \$25,800.

It should be noted that USDOL is currently a relatively minor investor in the BWB program. USDOL is providing \$1.2 million or approximately 18% of the \$6.6 million BWB budget. The question for USDOL and the other donors is whether the package of BW services delivered over a three-year period is worth \$29,424. It is the opinion of the evaluator that if BWB is able to significantly reduce non-compliance in factories and develop a viable and sustainable business model for Bangladesh, it might well be worth the \$29,424 price tag.

3.5. Project Management Arrangements

This section examines the effectiveness of the management arrangements. The management structures and staffing for each project is presented and compared. Next, the costs of these structures (staffing) and percent of the overall project budget are presented and discussed. Based on the review and comparison of the management structures and costs, the evaluator provides several management structure options for USDOL to consider in future projects.

Project Management Structures

Table 17 shows the number of staff and their effort for five major staff categories that include project management, technical support, administration and finance, office support, and headquarters support. The *number* column consists of the number of persons charged to the project budget while the *effort* category lists the effort in terms of persons. For example, 1 represents 100% of a person’s effort charged to the project. On the other hand, .17 represents 17% of a person’s time charged to the project.

The allocation of staff to the four USDOL-funded projects varies considerably. The ILO F&BS project only has two full-time persons charged to the budget. These include the CTA and administrative assistant. On the other hand, the BWB has 21 full-time positions charged to the budget. The BWB staffing structure includes the CTA, 12 EAs, 2 training officers, 2 program officers, a knowledge manager, an administrative officer, a finance officer, and a driver.

Table 17: Allocation of Staff for Each Project

Staff Category	FPRW		ILO F&BS		SC F&BS		BWB	
	<i>Number</i>	<i>Effort</i>	<i>Number</i>	<i>Effort</i>	<i>Number</i>	<i>Effort</i>	<i>Number</i>	<i>Effort</i>
CTA/Project Manager	1	1	1	1	1	1	1	1
Technical/Program	1	1	-	-	3	.17	16	16
Administrative/Finance	1	1	1	1	3	.17	3	3

Office Support	1	1	-	-	5	.17	1	1
Headquarters	-	-	-	-	5	.10	-	* ¹⁶
Total Staffing	4	4	2	2	17	1.6	21	21

The SC F&BS project is slightly misleading. While there are 16 different persons charged to the budget, the project manager is the only full-time position. The Bangladesh program and support staff provide approximately 17% of effort per person while five headquarters based staff provide an average of 10% effort. The FPRW project had four full-time positions charged to the budget.

Cost of Management Structures

Table 18 shows the costs of the different management structures discussed above under management structures. As expected, BWB is the project with the highest percent of its budget allocated to personnel. Forty-one percent of the BWB budget goes to pay for management, technical, administrative, support, and BW global staff. The large number of staff should be expected since the BW model employs its own auditing and training staff and the BWB program is expected to provide services to 225 factories.

The project with the smallest percent of the budget allocated to staffing is the SC F&BS project. One might expect that the staffing costs would be lower than 33% since the project manager is the only full-time position. However, the five headquarters personnel charged to the project account for nearly \$200,000 or about 20% of the budget.

Table 18: Staff Costs and Percent Staff Costs for Each Project

	FPRW USD	ILO F&BS USD	SC F&BS USD	BWB USD
Project Staff	591,531	584,685	325,589	2,717,871
Total Budget	1,476,437	1,500,000	1,000,000	6,620,316
Percent of Budget	40%	39%	33%	41%
Headquarter Overhead	13%	13%	27%	13%

The ILO F&BS and FPRW projects allocate about 40% of their budgets to staffing despite the fact that the F&BS project has two full-time positions while the FPRW project had four full-time positions. The difference can be attributed to the salary and benefit package that the F&BS CTA receives, which is higher than the one the FPRW CTA received.

The ILO indirect cost recovery rate is about 13%, which it charged to the three ILO-managed project budgets. The SC charged 27.41% as its indirect cost recovery rate for the SC F&BS project, which seems high when compared to the ILO and other NGO projects that the evaluator has evaluated.

¹⁶ The BWB budget includes a line item of \$116,000 for BW Global staff located in Geneva. It is not clear how many staff are supported and their level of effort.

Management Structure Options

The analysis of the different management structures and costs of the USDOL-funded projects in Bangladesh provides some interesting lessons that might be applied to future projects.

- The SC F&BS project has a country level management structure that is highly efficient and effective. Local staffing only costs \$131,000 or about 13% of the budget. The local management structure has been able to deliver high quality and effective fire and building safety training to union organizers and leaders. The evaluator confirmed this in interviews and focus group discussions he conducted with project staff, trainers, and the union organizers and leaders. However, the management structure becomes less efficient when the SC headquarters personnel and indirect rate costs are added. Together, these costs add approximately \$491,000 and account for 49% of the budget. While some degree of headquarters support is necessary to provide technical, administrative, and financial oversight to the project, the evaluator is not clear whether \$491,000 of support is required. USDOL might scrutinize these costs more closely in future solicitations.
- The ILO F&BS project provides an interesting model that minimizes management and technical staff and maximizes the use of international and national consultants to deliver the inspection, assessment, and training services. The synergy the project has been able to create with the ILO RMG Program has helped reduce the need for administrative and financial staff. The CTA, who is an experienced international firefighter, provides both technical assistance and management oversight to the project. However, his salary and benefit package is budgeted at more than \$500,000 or about 35% of the budget. The question that USDOL might ask is whether the project could have hired a qualified Bangladeshi to manage the project and contracted an experienced international consultant, like the CTA, to provide the required technical training and other services at strategic times during project implementation.
- O'Brien and Associates International has evaluated Better Work projects in Vietnam, Cambodia, Lesotho, and Nicaragua. The BW model employs a continuous improvement process that has proven to be effective at addressing factory level non-compliance of ILS and national labor laws. While the quality of the BW services is generally high, the BW model is expensive for several reasons. It employs highly qualified technical staff at United Nations (UN) labor rates and operates within UN regulations that drive up the cost of office rental, vehicle use, and security arrangements. BW is experimenting with approaches to lower costs such as establishing local foundations that operate according to local labor market and rental rates. USDOL might consider collaborating with BW Global on future programs that begin with these more efficient approaches rather than waiting until the project ends.

3.6. Impact Orientation

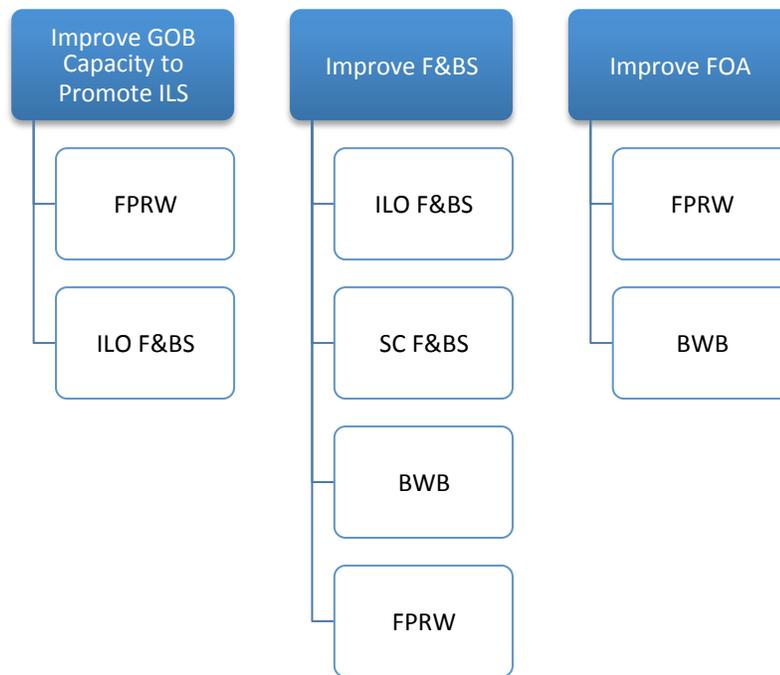
The evaluator was not able to empirically measure the impact of the USDOL-funded projects for several reasons. First, the only project that was implemented long enough to have had measureable impact is FPRW. However, as discussed in the project design section, the FPRW project did not have a rigorous PMP with impact and effect indicators. Furthermore, it is clearly beyond the scope of this evaluation to conduct an impact evaluation, which would have required

a rigorous random sample survey and control groups. The ILO and SC F&BS projects and BWB are too early in their implementation to assess impact.

Instead, the evaluator conducted an analysis of the USDOL-funded projects within its strategic framework for Bangladesh RMG sector. As discussed in the introduction section, the USDOL strategic framework consists of an overall goal of promoting respect for ILS and three objectives. The objectives include improving the Bangladeshi government’s capacity to promote ILS, improving fire and building safety, and improving freedom of association. Figure 2 shows the three strategic objectives with the USDOL-funded projects that are supposed to contribute to the corresponding objective.

Two of the USDOL-funded projects contribute to improving the capacity of the GOB to promote ILS. The FPRW project focused on improving the BLA by providing technical input into the BLA amendments and assisted the DL to implement an online union registration system. The ILO F&BS project’s intermediate objective aims to enhance the GOB capacity to enforce fire and general building safety laws and regulations that are consistent with international labor and fire standards and good practices.

Figure 2: USDOL Strategic Framework for the RMG Sector



All of the USDOL-funded projects aim to address fire and building safety. For example, the ILO F&BS project intends to improve the regulatory framework and build the capacity of FSCD and labor inspectors to conduct effective inspections. The SC F&BS project aims to address fire and building safety risks by educating union leaders on identifying and resolving these risks. BWB, although not fully focused on fire and building safety issues, does address fire safety risk in the compliance assessments and provides fire safety training to workers and managers. Even though fire safety was not initially envisioned, FPRW decided to address fire safety after the fires at Tazreen Fashions and Smart Fashion by providing educational materials and training.

FPRW and BWB also address the freedom of association objective. In addition to the BLA 2006 amendments, FPRW trained union federation officers and organizers in labor rights including freedom of association principles. BWB addresses freedom of association by including questions on its compliance assessment tool about freedom of association and reprisals by factories for workers who organize unions. It also has access to BW training modules on labor rights and freedom of association.

The key question is whether the four USDOL-funded projects have or will make a tangible contribution to achieving the USDOL strategic objectives for the Bangladesh RMG sector. Table 19 provides an impact assessment of the projects on the strategic objectives. To conduct the assessment, the evaluator gleaned information from the FPRW midterm and final evaluation reports, the technical progress reports, data-tracking tables, and interviews conducted with project staff and stakeholders. The evaluator triangulated information from these different data sources to present a realistic picture of the actual or potential impact of these projects on the strategic objectives.

Table 19: Impact Assessment of the USDOL Strategic Objectives

Strategic Objective	Impact Assessment
<p>Improve GOB capacity to promote ILS</p>	<p>The FPRW project facilitated technical input into the BLA amendments and helped the DL implement an online union registration system. ILO and other labor experts opine that the amendments are an important step but fall short of satisfying ILS. The online union registration system, according to the DL and former FPRW managers, is operational. However, trade unions believe the online registration system is overly bureaucratic and difficult to use. The ILO F&BS project aims to upgrade regulatory framework and build the capacity of GOB regulatory agencies to conduct fire and building safety inspections. <i>While the project has started working on the regulatory framework and capacity building activities, it is too early to determine their impact on the GOB capacity to promote ILS. The evaluator believes it is highly probable that the project will upgrade the regulatory framework and build capacity. The challenge, however, will be whether the GOB has the political will to implement and sustain these outcomes.</i></p>
<p>Improve Fire and General Building Safety</p>	<p>The ILO F&BS project has collaborated with the ILO RMG Program to conduct inspections of 1,500 buildings. However, more than 50% of these buildings require detailed engineering assessments, which have not occurred. Furthermore, most of these buildings will require retrofitting that will require financing. According to data provided by the ILO F&BS CTA, the number of fires decreased from 253 in 2013 to 152 in 2014 while the estimated fire damage decreased from \$30 million in 2013 to \$10.2 million in 2014. The number of fires and damage further declined in 2015. As of October 2015, FSCD reported 28 fires and \$3.9 million in fire-related damages. The downward trend in number of fires and estimated damage from the fires should be closely monitored to determine whether the trend continues.</p> <p>The SC F&B safety project aims to build the capacity of union organizers and leaders to address fire safety and building risk factors in approximately 160 factories of an estimated 3,500 factories currently operating. BWB compliance assessments include questions on fire safety and the program intends to provide training to workers and managers in most of its targeted 225 factories. Finally, as discussed previously, FPRW developed fire safety educational materials and trained workers and managers. <i>In the opinion of the evaluator, the USDOL-funded projects will have made an important contribution to improving fire and building safety in the RMG sector.</i></p>

<p>Improve Freedom of Association</p>	<p>FPRW invested heavily in training union federation officials and organizers on labor rights including freedom of association. However, there is no empirical evidence that the training contributed to increases in worker awareness and the formation of more unions. The FPRW midterm evaluation identified two problems with the union capacity building activities. First, NWCAA provided many of the trainees but it did not have active unions in RMG factories. Second, the majority of the union organizers that were trained were not effectively disseminating information to factory workers. The BWB compliance assessment tool includes questions on freedom of association. However, the recent final evaluation of the BW Nicaragua program¹⁷ and the 3rd biannual BW Haiti synthesis report¹⁸ surfaced issues regarding the effectiveness of the BW compliance assessment to accurately identify violations of labor rights or monitor their remedy. <i>The evaluator would like to acknowledge that advancing freedom of association in Bangladesh is a difficult task. Nevertheless, he believes that USDOL's contribution to improving freedom of association has and will likely continue to be modest with its current portfolio of projects.</i></p>
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3.7. Sustainability

The following section examines the extent to which the four USDOL-funded projects developed the required sustainability and exit strategies and plans. It also assesses the sustainability of key FPRW outputs and results as well as the potential of the ILO and SC F&BS projects and BWB to achieve sustainability.

Sustainability Strategies

USDOL's expectation for how grantees address sustainability is described in the MPG 2013. Section 8 of project document outline in the MPG 2013 requires a discussion on sustainability and exit strategy. In addition, the MPG states *"If necessary, grantees must submit a revision to the Project Document section on promoting sustainability within 12 months of award. Grantees will report on the progress of the sustainability plan in each of their TPRs."* On one hand, the onus is clearly on the grantee to describe its strategy for sustaining key outputs and results in the project document and report on the progress. If deemed inadequate, the onus is on USDOL to request the grantee to provide a more detailed description of the sustainability strategy.

The evaluator reviewed the four project documents to assess to what extent they contained sustainability and exit strategy strategies. The FPRW project document contains a one-paragraph discussion on what will likely be sustained once the project ends. The description includes the labor law reform, increased capacity of the trade unions, an understanding and acceptance of labor-management cooperation, improved union registration process, and an efficient system to address anti-union discrimination complaints. The discussion of sustainability in the project document was essentially a summary of the project's objectives. The project document, however,

¹⁷ United States Department of Labor, Independent Final Evaluation of Better Work Nicaragua, August 2015.

¹⁸ International Labor Organization: International Finance Corporation, Better Work Haiti: Garment Industry 3rd Biannual Synthesis Report under the HOPE II Legislation, Geneva: ILO, 2011.

does not contain a sustainability plan or exit strategy that describes precisely what interventions and outputs will be sustained, who will sustain them, and how they will be sustained.

The ILO and SC F&BS project documents do not contain sustainability and exit strategy sections and USDOL did not require them to submit sustainability strategies once the projects were approved. The BWB project document, on the other hand, contains an extensive discussion of its sustainability strategy that is based on revenue generated from factory subscription fees and compliance assessment reports purchased by the brands. In addition, the BWB project document states that *“a sustainability plan will be developed in the early stages of project implementation to define clear targets and milestones, taking into account the Bangladeshi context, considering 3 specific criteria: commitment of national and international stakeholders, cost recovery, and local capacities.”* However, the sustainability plan has not yet been developed because the project has been largely focused on the factory self-evaluations.

Assessing Project Sustainability

The evaluator attempted to assess the sustainability or likelihood of sustaining key project outputs and results for the four USDOL-funded projects. FPRW is the only project that has ended and where sustainability can be clearly assessed. While the ILO and SC F&BS projects are nearing their midway points, both projects have experienced delays and are behind their planned implementation schedules. BWB has also experienced delays and is behind schedule. The delayed implementation of these three projects makes the sustainability assessment more difficult.

Based on the findings of the FPRW midterm and final evaluation reports, the only outputs that the FPRW project was able to sustain were the amendments to BLA 2006 and the DL online trade union registration system. As discussed previously, the BLA 2006 amendments fall short of complying with ILS while the DL's online union registration system is not optimally functioning. According to the evaluations' findings, FPRW was not able to sustain the trade union capacity building program, the outreach education campaign, an anti-union discrimination mechanism, or labor management cooperation.

One of the principle purposes of the FPRW project was to address labor rights issues that, in theory, would lower the risks to operate a BW program in Bangladesh. The midterm evaluation report noted that the true sustainability legacy of FPRW would be the approval of a BW Bangladesh program. The evaluator is not convinced that the FPRW project was instrumental in the approval of the BWB program for a couple of reasons. First, BWB design was completed and submitted before the impact of FPRW on labor rights could be fully assessed. Second, as discussed previously, the impact of FPRW on labor rights, especially those related to ILO Conventions 87 and 98, was modest at best. The evaluator believes that there were other independent factors that influenced the decision to establish a BW program in Bangladesh.

The ILO F&BS project aspires to establish an upgraded fire and building safety regulatory framework. Based on interviews with stakeholders, the evaluator believes the project will likely be successful at achieving the upgraded regulatory framework. It is not clear, however, whether the government has the political will to implement and enforce the regulations, which would determine its sustainability.

The ILO and SC F&BS projects have important capacity building components. The ILO F&BS project aims to build the capacity of FSCD and labor inspectors to conduct effective inspections while the SC F&BS project intends to build the capacity of workers and worker organizations to effectively identify and remedy fire and building safety risks. As discussed earlier in the report, the evaluator believes the capacity building in both projects is effective. Furthermore, the ILO F&BS project has started a training of trainers program for FSCD that appears to be building institutional capacity to sustain the training. It is less clear how the training will be institutionalized within DIFE given its institutional weaknesses.

The SC F&BS project has also attempted to develop capacity within the union federations to sustain fire and building safety training. However, it is not clear to the evaluator how the projects intend to achieve long-term sustainability of their training or training outcomes since they have not articulated their sustainability strategies and plans. The evaluator understands that the unions themselves are struggling to achieve viability. For example, only 50 unions are collecting membership dues but these dues are not sufficient to fully sustain the unions.

The project that has the best chance to achieve sustainability is BWB. The BW business model is designed to generate revenue for the services it provides to factories and brands. To achieve sustainability, however, BWB must develop a strategy to generate sufficient income to cover its operating costs. BWB should be able to generate approximately \$1 million of revenue annually from the targeted 225 factories and 18 brands given its current fee structure. This is about 36% of the BWB budget for 2015. BW Global is considering increasing the fee structure by 50%, which would increase revenue to nearly \$2 million or about 70% of the 2015 budget.

In the opinion of the evaluator, to achieve 100% cost recovery and full sustainability, BWB should consider establishing a local organization. The local organization would provide the BW services based on local labor market rates instead of the more expensive ILO salary and benefit packages. The BW programs in Indonesia and Jordan are experimenting with local structures that could prove to be rich sources of learning for BWB. Since establishing a local organization takes time and considerable effort, it would behoove BWB to begin the process of defining and establishing the entity as soon as possible.

Sustainability Lessons

In the course of conducting interviews and reviewing project documents, the evaluator made several interesting observations regarding the sustainability of USDOL-funded projects. He would like to conclude the discussion on sustainability by offering these observations to USDOL as lessons that might benefit future USDOL programs.

Sustainability Design and Resources

As discussed above, the four USDOL-funded projects lacked adequate sustainability strategies and plans. The FPRW project mentioned sustainability but did not include a true sustainability plan. The ILO and SC F&BS project documents do not contain sustainability strategies. While the BWB business model is built on financial sustainability, it has not developed a sustainability plan for Bangladesh. However, what captured the attention of the evaluator more than the absence of sustainability plans was that sustainability was not contemplated in the design of the

projects. The project designs do not have a discrete set of inputs or resources, activities, outputs, and outcomes that address sustainability. Likewise, the PMPs do not contain sustainability indicators and milestones that might be tracked to determine whether a project is on course to achieve sustainability. The evaluator believes that key project outputs and results can most effectively be sustained if they are an integral part of the design the project management is responsible for achieving.

Policy Change

The evaluator has evaluated a variety of labor projects funded by USDOL and implemented by the ILO. Policy change is often one of the cornerstones of these projects. The three ILO-implemented projects in this evaluation have a key policy element. For example, FPRW aimed to influence Bangladesh labor law so it conformed to ILS while the ILO F&BS project intends to improve the GOB fire and building safety regulatory framework. BWB's third intermediate objective focuses on policy change beyond the compliance work in factories. The evaluator has observed that changes to policy are often times not sustained because the corresponding government agency does not have the capacity, political will, or, sometimes, neither one of these to help facilitate the implementation of policy. Many times, projects lack clear strategies to help ensure the effective implementation of the policy. Despite the intentions, policies that are not implemented do not benefit workers and are not sustained. The evaluator is not suggesting that USDOL-funded projects not address policy change. However, *future USDOL projects should clearly articulate strategies to address the lack of capacity and political will to implement the policy changes*. This is also addressed in the recommendation section.

Capacity Building

Capacity building is the other cornerstone of most USDOL-funded projects. The four projects that USDOL supported in Bangladesh have strong capacity building components. FPRW invested about 50% of its total budget in training for union federation officials and organizers and in the IBN training provided by FMCS. The ILO F&BS project is investing nearly 43% of its budget on the inspection toolkits and training for FSCD and labor inspector training while the SC F&BS project is investing 65% of its budget in training for union organizers and leaders. It is difficult to say what percent of the BWB budget is dedicated to capacity building since it does not have an output-based budget. Nevertheless, training for factory management and workers designed to improve compliance is one of BW's core strategies.

The evaluator believes that, based on evaluation findings, the effectiveness of the training delivered in USDOL-funded projects is high. This is certainly the case in this evaluation where the FSCD inspectors and union organizers and leaders demonstrated a thorough understanding of fire and building safety content. This was also the case in the FPRW midterm evaluation where union organizers showed a solid grasp of training content on labor rights and union organizing principles. The weakness, however, is the reinforcement mechanism that affects both impact and sustainability.

Peter Ostrow has conducted extensive research on the effectiveness of training of salespeople in top corporations. One of his major findings is that reinforcement of training is key to translating training into results. According to his research, *“best-in-class companies outpace laggards by*

*nearly a two-times factor in providing post-training reinforcement of the best practices commonly learned in classroom-style instructor-led sales education sessions.”*¹⁹ The point is that to translate training events into results, training requires reinforcement and to sustain the results, a training reinforcement mechanism that survives beyond the life of the project should be developed.

¹⁹ Peter Ostrow, Sales Training: “Deploying Knowledge, Process and Technology to Consistently Hit Quota,” Aberdeen Group, September 2010.

V CONCLUSIONS

The following conclusions represent what the evaluator has “concluded” from the analysis of the findings and are organized according to the seven evaluation sections: project design and monitoring and evaluation; relevance and strategic fit; progress and effectiveness; efficiency and use of resources; project management arrangements; impact orientation; and sustainability.

4.1. Project Design and M&E Systems

- The USDOL MPG 2013 provides guidance on project design and M&E systems that meet international best practice. The USDOL-ILAB project design and M&E systems guidance has significantly improved over the past three years.
- The IBN and JPS training provided by FMCS are training activities provided to the FPRW project, and therefore, is not considered a discrete project.
- The project designs of the four USDOL-funded projects vary considerably. They do not fully meet the project design criteria and guidance provided in the MPG such as the RF or logic model diagram. Furthermore, the intermediate objectives and outputs that are not written to satisfy the definitions in the MPG.
- None of the USDOL-funded projects fully meet the PMP guidance in the MPG. The primary weakness is that the projects did not submit a PMP that followed the recommended format in the MPG. Other weaknesses included inadequate or inconsistent indicators and definitions for terms used in the indicator.
- Some projects are not submitting the data-tracking table with the TPRs, which is a requirement in the MPG. The data-tracking table is a useful management tool that should provide USDOL managers a clear summary of the indicator targets and achievements.
- The MPG guidance is intended to create a certain degree of uniformity among USDOL projects that allow managers to assess project performance and facilitate evaluations. Project designs and PMPs that do not follow the MPG guidance tend to create variations in how objectives, outputs, and activities are stated and organized that make it difficult to compare and contrast projects and their performance.

4.2. Relevance and Strategic Fit

- The USDOL-funded projects have effectively collaborated with a range of stakeholders that include the GOB (MOLE, BEPZA), trade unions (IBC and NWCEE), employers’ associations (BEF, BGMEA, BKMEA) and RMG factories and brands.
- The most relevant support provided by the USDOL-funded projects is in the area of fire and building safety training. FSCD, DIFE, trade unions, and employers’ associations, and factories believe that the training is highly relevant and timely. The BWB interventions have the potential to be highly relevant for factories and brands.

- The IBN and JPS training provided by FMCS under FPRW was the least relevant support. The DL, BEPZA, trade unions, and employers' association do not believe the training was culturally relevant to the Bangladesh context and found it difficult to apply.

4.3. Progress and Effectiveness

- The current USDOL-funded projects are behind in achieving indicator targets based on the PMPs and implementation schedules. The reasons include delayed start dates, political unrest and strikes, and, in the case of the SC F&BS project, restricted access to factories to conduct joint training for managers and union leaders.
- The USDOL-funded projects have created synergies with other projects that have increased their effectiveness. FPRW collaborated closely with the Better Work Design Project funded by USDOL and provided the model for the Norwegian-funded FRLR project. The ILO F&BS project is collaborating very closely with the ILO RMG Program and creating synergies around building inspections, trainings, and databases. It is also collaborating with the Accord and Alliance initiatives. The SC F&BS project is built on the trade union groundwork laid by the USAID Global Labor Fund project.
- The IBN and JPS training provided by FMCS proved to be largely ineffective for two primary reasons. First, reinforcement training and coaching was not provided as envisioned. Second, many training participants found it to be difficult to apply within the Bangladesh context.
- The DL would welcome new collaboration with USDOL to build capacity to more effectively respond to ILS issues such as freedom of association via union registration and support.

4.4. Efficiency and Use of Resources

- It was not possible to conduct a formal cost-benefit or cost-effectiveness analysis because the projects do not share common impact or effect indicators and the evaluator did not have access to cost and impact standards to compare projects.
- The output-based budget analysis shows that some of the outputs for FPRW and ILO F&BS projects appear to be expensive while the output costs for the SC F&B project appear to be more reasonable. The cost for a factory to participate in BWB seems reasonable especially if the factory can significantly reduce non-compliance issues.

4.5. Project Management Arrangements

- The USDOL-funded projects appear to be effectively managed. The evaluator did not identify any particular management problems that would affect project performance. However, the ILO F&BS CTA is managing components 1 and 2 of the ILO RMG Program that is disallowed in the Cooperative Agreement.
- The management structures, especially staffing, varies significantly among the projects. For example, BWB has a technical and administrative team of 21 persons while the ILO and SC F&BS projects have about 2 persons each. FPRW staffing included 4 full time positions.

- The management structure determines its cost. BWB is the most expensive management structure due to the large number of personnel. The SC F&BS project is more expensive than one might think due to the number of headquarters personnel that are charged to the project as well as a high indirect rate (27%).
- Reliance on national or regional talent and labor market rates would significantly reduce the cost of the management structures. Judicious and strategic use of qualified international consultants would be required to support local management and bring international best practices to projects.

4.6. Impact Orientation

- The evaluator was unable to conduct an empirical assessment of the impact of the USDOL-funded projects because the FPRW project did not have impact or effect level indicators and it is too early in the lives of the other projects to assess impact.
- The portfolio of USDOL projects has contributed to improving fire and building safety in the RMG sector. Improving the GOB ability to address ILS, especially in the area of fire and building safety, also looks promising as long as the GOB has the political will to implement and enforce policy. However, the impact on ILS, especially the freedom of association and collective bargaining conventions, has been modest at best.

4.7. Sustainability

- The MPG requires grantees to include sustainability plans or exit strategies in the project documents or provide them 60 days after the grant is awarded. The FPRW project document briefly mentions what should be sustained but does not include a sustainability plan. The BWB project document discusses sustainability within the BW business model and notes that a sustainability plan will be developed for Bangladesh. The plan has not yet been developed. The ILO and SC F&BS project documents do not have sustainability plans or exit strategies.
- FPRW's contribution to the BLA 2006 amendments can be considered sustainable although they fall short of meeting ILS. It appears that the online registration system has also been sustained but will require additional technical support from the FLRW project to ensure it operates as initially intended. FPRW was not able to sustain the trade union capacity building program, the outreach education campaign, an anti-union discrimination mechanism, or labor management cooperation.
- It is too early to determine whether the ILO and SC F&BS outputs and results will be sustained. The challenge for sustaining the ILO F&BS project policy output is the capacity and political will of the GOB to implement and enforce the fire and building safety regulations and laws.
- The ILO and SC F&BS projects invest heavily in training. To translate training into results, the training should be reinforced. To sustain the results, the projects should ensure that sustainable reinforcement mechanisms are established before the project ends.

BWB has the best opportunity to sustain itself as a program due to the revenue it can generate from factory subscriptions and the sales of compliance reports to brands. However, it must

generate enough revenue to cover its expenses to be able to breakeven. The key to BW program sustainability in Bangladesh will be developing a local entity that can implement BW services based on local labor market rates.

V RECOMMENDATIONS

The following recommendations are based on the findings and flow from the conclusions. The first four recommendations address current or future USDOL-funded projects in Bangladesh. The last five recommendations are intended to improve the effectiveness of USDOL grant making process and impact of its technical cooperation programs globally.

5.1. ILO F&BS and RMGP

USDOL should work with the ILO Bangladesh management team to clearly define the roles and responsibilities of the ILO F&BS CTA as well as the activities and outputs the project is responsible for producing. There are several issues that should be addressed immediately. First, the cooperative agreement between the ILO and USDOL states that the CTA is required to spend 100% of the time on the USDOL-funded project. This is clearly not the case since the CTA spends considerable time managing the RMGP components one and two. Second, the ILO F&BS project is reporting to USDOL on building inspections that USDOL is not financially supporting. The project should report to USDOL on outputs and outcomes paid for with USDOL funds. Third, the ILO F&BS project has lost its identity within the larger and more visible RMGP that is well branded by its three donors. For example, stakeholders tend to credit the project's work on regulatory frameworks and capacity building to RMGP instead of the ILO F&BS project.

5.2. Indicators and Definitions

USDOL should require the ILO F&BS project to operationally define what it means by an upgraded fire and building safety regulatory framework (Output 1). Based on the definition, the project should develop a set of clear and concrete indicators that can be used to measure the progress in achieving this output. This is an important output that contributes to the intermediate objective. The operational definition and indicators would help USDOL, ILO, and future evaluators more precisely track, assess, and eventually determine whether the output was achieved.

5.3. Sustainability Plans

USDOL should require the ILO and SC F&BS projects to develop and submit sustainability plans as soon as possible. The ILO and SC F&BS sustainability plans should include what outputs or results will be sustained, the strategy for sustaining them, who is responsible, the timeframe, and the resources that are required to ensure their sustainability. The plan should include clear and concrete indicators to evaluate progress. The sustainability plans should be incorporated into the workplans and reported in TPRs and data-tracking tables.

5.4. International Labor Standards Project

USDOL might consider investing in a project designed to build the capacity of the DL to promote ILS, especially freedom of association. The DL is responsible for registering unions and providing relevant information and services. However, the DL is under-resourced since most of the recent international support has gone to DIFE to build its capacity to ensure effective

building and fire safety inspections. USDOL might consider implementing the project in two phases. Phase one would involve hiring and placing an ILS expert within the DL to provide advice and assistance to assess capacity, needs and opportunities. Based on the results of the assessment, USDOL might consider placing an ILS expert that would use the results of the assessment to work with USDOL to design the second phase, which would be the more formal capacity building component to more aggressively promote ILS within the DL.

5.5. Evaluation Recommendations

USDOL should require its grantees to address midterm evaluation recommendations since they are intended to improve the performance of the project. The MPG 2013 includes an annex in the TPR section entitled *Update on Project Activities in Response to Evaluation and Audit Recommendations*. The USDOL project manager should require the grantee to complete and submit the form. Once submitted, the USDOL project manager should hold the grantee accountable for implementing the recommendations. If the recommendations are not addressed, USDOL should consider withholding fund allocations until the recommendations have been adequately addressed.

5.6. Project Design and Performance Monitoring

USDOL should require its grantees to adhere to the MPG guidance on project design and performance monitoring. USDOL has significantly improved the guidance it provides in the MPG over the past three years. The guidance on project design and performance monitoring is intended to improve the quality of the USDOL-funded projects and their ability to have and demonstrate impact. Currently, many grantees do not follow the guidance and, consequently, the quality of the projects suffers. Minimally, USDOL should require grantees to submit results framework diagrams that clearly show the causal relationships between outputs, intermediate objectives, and the development objective. The outputs and objectives should be written to meet the definitions and examples in the MPG. Grantees should also be required to submit PMPs in the recommended format in the MPG. Indicators should be appropriate and accurate measures of output and objective achievement.

5.7. Grantee Enforcement Mechanism

USDOL should consider developing an enforcement mechanism that would require grantees to adhere to the MPG requirements and address USDOL technical questions and recommendations aimed at improving project design, performance monitoring, interventions and strategies, and project management. OTLA managers are concerned that some grantees do not respond to their requests to address issues with project design, performance monitoring, and project implementation. The mechanism, which is intended to address this concern, and might include several steps. For example, the first step would require the project director to address USDOL recommendations. If the recommendations were not adequately addressed within the time period requested, the next step would be for the OTLA director or deputy director to write to the grantee's headquarters to request that the recommendations and/or requirements be addressed. If the grantee still fails to address the recommendations or meet MPG requirements, the OTLA director or deputy director would raise the issue with the USDOL grants officer who would send a letter of notice to the grantee requiring that the recommendations and/or MPG requirements be

addressed. The final step would be for USDOL to suspend further allocations of funds to the grantee until the recommendations or requirements are adequately addressed.

5.8. Output-Based Budgets

USDOL should require its grantees to adhere to the MPG requirement to develop and submit output-based budgets and reports. USDOL should ensure that each output is linked to a cost and indicator target, which will help USDOL assess the reasonableness of the cost of the output and compare common output costs among projects. The output-based budgets would also help external evaluators more effectively assess project efficiency.

5.9. Sustainability Design

USDOL should modify the MPG (and future solicitations for grant proposals) to require grantees (and applicants) to build the sustainability strategy into the project design. USDOL currently requires grantees to include a description of the sustainability plan and exit strategy in the project document as well as submit a more complete sustainability plan 12 months after the award. This recommendation is intended to integrate the sustainability plan and exit strategy into the fabric of the project design. The sustainability strategy should include specific activities and outputs that are linked to the corresponding intermediate objective. The PMP should include indicators for the outputs and intermediate objectives that measure sustainability. Finally, the project budget should include resources dedicated to implementing the sustainability activities and producing the sustainability outputs.

To help ensure sustainability, USDOL should not allow grant funds to be used to pay staff salaries and rent or purchase capital items unless the grantee can clearly demonstrate how it would assume responsibility for these expenses once the project ends. For projects that invest heavily in capacity building (i.e. training), grantees should clearly demonstrate how training will be reinforced during the life of the project and sustained including the reinforcement mechanism once the project ends. For projects that aim to address policies, grantees should articulate strategies to address obstacles to implementing policies that include government capacity and the political will to implement new or modified policies. The project should also specify how it intends to financially sustain key outputs such as information systems, tools, and websites.

5.10. Efficient Management Structures

USDOL should develop cost standards for project management structures aimed at increasing efficiency. The cost standards might establish a percent value of the total budget for the management structure (i.e. staffing and related costs) that should not be exceeded. The cost standards should be based on the principle of maximizing the use of national staff and minimizing the use of international staff. International staff, to the extent feasible, should be technical experts that provide short-term technical assistance. The cost standards should also minimize the number of grantee headquarters staff that are charged to the project. Grantees should provide a compelling business reason for those headquarters staff that are charged to the project. The cost standards might also establish a percent value of the total budget for headquarters staff, indirect rates, and other headquarters costs that should not be exceeded.

When examining alternative management structures, the issue of sub-contracting should be considered. The evaluator realizes that projects might reduce staffing only to have large sub-contract line items for national and international technical support. This could lead to more oversight, procurement time, and overall increases in labor costs, which would defeat the purpose of a more efficient management structure. USDOL should ensure that the balance between project staffing and sub-contracting line items for labor is balanced and absolutely necessary to achieve the project's objectives.

5.11. Dispute Resolution and Mediation Training

In countries where dispute resolution and mediation training have been identified as a technical assistance need and priority, USDOL should ensure that dispute resolution and mediation training and capacity building is incorporated into the design of the project where the training is part of a broader strategy to ensure the appropriate reinforcement of the training messages. The dispute resolution and mediation training outputs should also be linked to higher-level intermediate objectives or outcomes that measure the application of the training. Whether the dispute resolution and mediation training is provided by FMCS or another organization, the training should be culturally relevant to the country where the project is being implemented; the facilitators should possess relevant experience conducting dispute resolution and mediation from the country where the project is being implemented, the region, or at least similar countries; and the participants should be those who will likely be involved in dispute resolution or mediation activities. It is also recommended, as a good practice, for the grantee to conduct a needs assessment to ensure that the dispute resolution and mediation training is culturally and politically relevant.

Whether the dispute resolution and mediation training is provided by FMCS or another organization, the training should satisfy the following criteria:

- The training content should be culturally relevant to the country where the project is being implemented. Dispute resolution and mediation case examples as well as training tasks such as role-plays or simulations should be based on actual situation in the country.
- The facilitators should possess relevant experience conducting dispute resolution and mediation from the country where the project is being implemented, the region, or at least similar countries. The experience would allow the facilitators to draw upon real life examples that would enrich the training experience and increase their credibility with the participants.
- The participants should be those who will likely be involved in dispute resolution or mediation activities. In other words, the participants should be worker or employer representatives that have the role, responsibility, and commitment to undertake some form of dispute resolution or mediation process.

ANNEXES

ANNEX A: Terms of Reference

Terms of Reference

Bangladesh Multi-Project Evaluation

I. Introduction and rationale for the evaluation

The mission of the U.S. Department of Labor’s Bureau of International Labor Affairs (ILAB) is to improve global working conditions, raise living standards, protect workers' ability to exercise their rights, and address the workplace exploitation of children and other vulnerable populations. ILAB’s efforts help to ensure a fair playing field for American workers and contribute to stronger export markets for goods made in the United States. Over the last five years, ILAB has been actively engaged with the Government of Bangladesh, workers’ and other civil society organizations in Bangladesh, U.S. buyers and retailers, and other stakeholders in the United States and Bangladesh in efforts to address legal and policy issues concerning workers’ rights and workplace safety.

USDOL’s technical cooperation efforts have focused on the ready-made garment (RMG) sector, as well as the shrimp-processing sector, and broader concerns relating to Bangladesh’s labor law regime, including the separate laws and governance structure for Bangladesh’s Export Processing Zones (EPZs). Much of this work has come under the framework of the “Action Plan” developed in the context of the Generalized System of Preferences (GSP) trade preference program and in the wake of the Tazreen factory fire in November 2012 and Rana Plaza building collapse in April 2013.

Since the Action Plan was issued, ILAB has intensified its technical assistance with the Bangladeshi Government, industry, workers’ and other civil society groups, and other stakeholders to ensure that economic growth and the gains from trade go hand in hand with greater respect for workers’ rights and improved workplace safety. ILAB’s technical assistance has been guided by a unifying framework focused on the goal of promoting respect for international labor standards (ILS) by pursuing three complementary objectives:

- 1) Improve the Bangladeshi government’s capacity to promote ILS.
- 2) Improve fire and building safety.
- 3) Improve respect for freedom of association in the RMG sector.

Currently, USDOL is funding nearly \$6 million of technical assistance and cooperation programming towards achievement of these objectives. Notably, in September 2012 the ILO and the International Finance Corporation (IFC) launched a Better Work Program in Bangladesh with funding from USDOL and other donors. In September of 2013, USDOL awarded \$2.5 million for the ILO and the Solidarity Center to work with partners on the ground in Bangladesh to promote fire and building safety. In addition, USDOL has provided training in mediation through an agreement with the U.S. Federal Mediation and Conciliation Service. The combined portfolio of these projects makes USDOL one of the largest external funder in Bangladesh for labor-related programming, particularly in the RMG sector. As such, USDOL determined that it is

essential to assess the effectiveness of its approach to promoting international labor standards in Bangladesh.

In July 2015, USDOL contracted O'Brien & Associates International, Inc. (OAI), to carry out an independent multi-project evaluation of USDOL-funded technical assistance and cooperation in Bangladesh, with a particular focus on the Bangladeshi Ready-Made Garment (RMG) sector. This includes, in particular, the following four projects that USDOL is currently funding:

1. Bangladesh: Better Work Bangladesh
 - a. Fundamental Principles & Rights at Work (BW preparatory project)
2. Fire Safety Capacity Building of Workers in Ready-Made Garment (RMG) Sector
3. Bangladesh Fire & Building Safety, Ready-Made Garment (RMG) Sector
4. Mediation Training by U.S. Federal Mediation & Conciliation Service

II. Background of the Projects

Better Work Bangladesh and FPRW

The Better Work Bangladesh program (“BWB” or “the programme”), a partnership between the International Labour Organization (ILO) and the International Finance Corporation (IFC), aims to contribute to improving the life of the workers, their families and their communities, increase compliance with domestic [national] labor laws consistent with international labor standards, and increase the competitiveness of the ready-made garment sector in Bangladesh.

BWB will aim at building capacity at the factory and national structural levels so stakeholders will be able to identify, prevent, and address relevant problems through the most appropriate and effective means (tripartite, bipartite, individually). In practical terms this means that BWB will operate on two levels: 1) Factory-level: build in-factory capacity to improve working conditions and establish management systems in participating factories; 2) National structural level: assist in building constituent capacity to achieve structural, sustainable change in labor administration, industrial relations and social dialogue systems.

BWB has three main objectives: 1) Establish necessary management, consultative, coordination, knowledge, and communication structures to ensure effective and efficient programme operations; 2) Improve compliance with international core labour standards and national labor law and competitiveness in participating factories; 3) Establish and implement appropriate mechanisms to ensure accountability, coordination, and viability of BWB.

Improving Fire Safety Capacity Building of Workers in Ready-Made Garment (RMG) Sector

This fire and general building safety program builds on the concerns generated by recent disasters in the garment sector to address the serious challenges facing the ready-made garment industry and to secure lasting improvements in working conditions in Bangladesh. USDOL provided this grant to the Solidarity Center partly in response to requests for technical assistance

from the Government of Bangladesh, social partners, global buyers, and development partners in Bangladesh.

It is oriented in part to support the interventions identified in the Tripartite National Plan of Action, the Joint Statement and the Government of Bangladesh's recent commitments. The program has five components:

- Building and Fire Safety Assessment
- Strengthen Labor Inspection & Support Fire and Building Inspection
- Build OSH awareness, capacity and systems
- Rehabilitation and skills training for victims
- Implement a Better Work programme

The program intends to achieve immediate results in terms of rapid action on building and fire safety and support to survivors; as well as long term results in significantly improved legislation, capacity and implementation in regulation of working conditions, initially in the RMG sector but with the potential to expand to all sectors.

Bangladesh Fire & Building Safety, Ready-Made Garment (RMG) Sector

The *Improving Fire and Building Safety in Bangladesh's RMG Sector* project aims to address fire and building related risks in the garment sector in Bangladesh. Bangladesh's economic development depends heavily on exports from the ready-made garment (RMG) sector, with its extensive labor rights violations, including unsafe fire and building safety practices. These violations have caused numerous worker casualties, most notably from the Tazreen factory fire and the Rana plaza building collapse. Reports have shown that sub-standard buildings, poor emergency procedures, blocked fire exits, overcrowded workplaces, and inadequate inspection practices have resulted in a high death toll. A contributing problem has been the lack government capacity to educate and enforce appropriate fire and building safety standards.

The principle target groups for this project is the Ministry of Labor and Employment and other key ministries and offices, such as the Cabinet Committee for the RMG sector, the Ministry of Home Affairs' Office of Civil Defense, the Department of Inspection for Factories and Establishments, and other relevant government bodies. The project's overarching objective is to improve the Government of Bangladesh's enforcement of fire and general building safety laws and regulations in the RMG sector consistent with international labor and fire standards and best practices. Immediate objectives include improvements in the following:

1. Government policies and plans, in line with but not limited to the current National Tripartite Plan of Action on Fire Safety for the Ready-Made Garment Sector in Bangladesh and related initiatives.
2. Government capacity to efficiently and effectively inspect and ensure timely remediation of fire and general building hazards and protection against employer retaliation for reporting hazards.

3. Government education and outreach to employers and workers on fire and general building safety with improved social dialogue on fire and general building safety among tripartite partners (government, worker organizations, employer organizations).

The project's strategy is focused on improving government's ability to develop, educate on and enforce fire and general building safety standards will improve compliance with fire and building safety standards and thereby reduce relate damage and casualties and improve assistance provided to workers injured or killed and their families.

Dispute Resolution and Mediation Training by U.S. Federal Mediation & Conciliation Service

In coordination with ILAB and the labor reporting officer at the U.S. Embassy Dhaka, FMCS will continue to support the program developed with the Fundamental Principles and Rights and Work (FPRW) project to train the tripartite stakeholders in the Ready Made Garment (RMG) industry in interest-based negotiations and joint problem solving and to expand this program to the shoe and leather, shrimp processing and other export-oriented industries.

In the Spring/Summer of 2014, FMCS intends to design, develop and deliver a 5-day training program for employer and worker/union representatives in the RMG, shoe and leather, shrimp processing and EPZ industries in the principles and techniques of interest-based negotiations and joint problem solving. In order to build capacity, a training-of-trainers (ToT) module will be included in the 5-day program. Immediately following this program, and for cost efficiency purposes, FMCS conducted a two-day follow-up training for the RMG union and employer trainers who participated in FMCS training programs in 2012-2013. This served as a refresher course and to give the trained resource persons the opportunity to sharpen their knowledge and skills relating to interest-based bargaining and joint problem solving.

In late 2014, FMCS conducted a second, similar series of trainings and refreshers with mixed industry groups and BEPZA industrial relations officers, in addition to a 4-day training program on building effective labor-management committees.

III. Purpose, scope and audience of Evaluation

Purpose

The purpose of the evaluation is to assess the overall systemic impact and effectiveness of ILAB's international technical assistance and cooperation programs in Bangladesh. Unlike most project implementation-focused evaluations, the purpose is not to evaluate any one particular project funded by USDOL, but to accomplish the following:

- Assess the results of USDOL's contributions to promoting ILS in the Bangladeshi RMG sector, and in Bangladesh in general
- Fill knowledge gaps.
- Provide lessons learned.

- Make recommendations on the design of future ILS promotion projects.
- Make recommendations on how to enhance USDOL’s grant-making effectiveness to promote ILS in Bangladesh’s export garment sector and in other similar contexts in other countries in the future.

The evaluation will examine the extent to which USDOL-funded assistance and cooperation efforts have worked together to promote ILAB and USDOL’s mission, and broader USG policy and priorities particularly as they relate to the Bangladeshi export RMG sector; as well as to compare/contrast the programs with similar efforts by the US Government and other donors; and assess program cost-effectiveness and sustainability. Recommendations will be made for improving program effectiveness or efficiency, strengthening collaboration and partnerships, reducing duplication, enhancing synergies across complementary programs, and positioning program efforts for maximum impact and sustainability.

Audience

This is a special evaluative study commissioned at the request of the donor organization to answer decision-makers’ questions regarding implementation, impacts and sustainability in order to improve the program(s) and maximize results. As such, the primary audience of the current evaluation is the US Department of Labor. To a lesser extent, the implementing organizations and partners, the Bangladeshi government, the ILO, the tripartite constituents and other parties involved in the execution of the projects would use, as appropriate, the evaluation findings and lessons learned. The evaluations findings, conclusions and recommendations will also serve to inform stakeholders in the design and implementation of future labor cooperation efforts.

IV. Evaluation criteria and questions

To serve these purposes, this multi-project evaluation will focus on the following evaluation themes/criteria: 1) the validity of the design of the technical cooperation programs, 2) the relevance of the programs’ services to the target groups’ needs, 3) program efficiency and effectiveness, 4) the impact of the results so far, and 5) the impact orientation and potential for sustainability. These criteria are explained in detail below by addressing their associated questions:

Validity of the project design

1. To what extent are ILAB’s technical cooperation programs relevant to the current priorities and needs of stakeholders in the Bangladeshi RMG sector?
2. To what extent does ILAB’s programs take into account the needs and priorities of other stakeholders, including international brands sourcing from Bangladesh, USG, and others?

Relevance and strategic fit

3. Has the design of programs clearly defined outcomes, outputs and performance indicators with baselines and targets?

4. Have the programs been designed with realistic objectives and outcomes?
5. Did the project designs include an integrated and appropriate strategy for sustainability?

Efficiency and effectiveness

6. How effectively have the project management and relevant stakeholders monitored project performance and results? Are monitoring & evaluation systems in place and how effective are they? Is relevant information systematically collected and collated? Is the data disaggregated by sex (and by other relevant characteristics if relevant)?
7. How well (or poorly) are ILAB's technical assistance programs meeting their stated objectives?
8. What results can be attributed directly to ILAB's technical assistance efforts?
9. What overlap and synergies do ILAB's technical assistance programs have with similar programs funded by other USG, the private sector, and/or other donors, if any, and what are ILAB's unique contributions?

Effectiveness of management arrangements

10. Do the programs' performance measures and monitoring systems provide an objective assessment of program performance?
11. How could ILAB improve program effectiveness?
12. How does the effectiveness of ILAB's programs compare to similar programs funded by other USG, the private sector, and/or other donors
13. How cost-effective are ILAB's programs in achieving their objectives?
14. Is the current management structure of ILAB's programs the most cost-effective approach.

Impact orientation and sustainability

15. What impact do ILAB's technical assistance programs make in the Bangladeshi labor environment and the RMG sector in particular?
16. What additional actions can be taken by ILAB (or other partners) to ensure that the impact of the technical cooperation efforts is sustained?
17. What amount and type of resources may be needed to more adequately fulfill ILAB's technical assistance responsibilities or to ensure local ownership?

18. Current reports indicate that the Bangladesh Accord on fire safety and the Alliance for Bangladesh worker safety have conducted approximately 2,000 inspections and the ILO supported national initiative have conducted 1,100 inspections. How does the interaction between the three initiatives, in development and implementation of corrective action plans, support the future sustainability of the GoB's fire and building safety regulatory framework and its implementation?

V. Evaluation Management and Support

Dan O'Brien will serve as the evaluator for this evaluation. Dan is a private sector and labor expert with substantial experience providing technical assistance to and evaluating employer-based labor projects. Dan has extensive evaluation experience in Asia including the mid-term evaluation of the FPRW program. Dan also provided technical backstopping for the evaluations of Better Work Vietnam and Better Factories Cambodia projects.

O'Brien and Associates will provide logistical, and administrative support to the evaluator, including travel arrangements and all materials needed to provide the deliverables specified in the Terms of Reference. O'Brien and Associates International will also be responsible for providing technical oversight necessary to ensure consistency of methods and technical standards.

VI. Roles and Responsibilities

The Evaluator is responsible for conducting the evaluation according to the terms of reference (TOR). S/he will:

- Review the TOR and provide input, as necessary
- Review project background documents
- Review the evaluation questions and refine the questions, as necessary
- Develop and implement an evaluation methodology (i.e., surveys, conduct interviews, review documents) to answer the evaluation questions, including a detailed discussion of constraints generated by the retrospective nature of this evaluation methodology and data collection and how those constraints could be avoided in future projects.
- Conduct Planning Meetings, as necessary, with USDOL and implementing organization
- Decide composition of field visit interviews to ensure objectivity of the evaluation
- Present verbally preliminary findings to project field staff and other stakeholders as determined in consultation with USDOL and the project
- Prepare an initial draft of the evaluation report and share with USDOL and Project
- Prepare final report

The USDOL Project Manager is responsible for:

- Drafting the initial TOR
- Finalizing the TOR with input from the implementer and the evaluator
- Reviewing proposed evaluator
- Providing project background documents to the Evaluator (responsibility is shared with project staff)

- Obtaining country clearance
- Briefing project field staff on upcoming visit and work with them to ensure coordination and preparation for evaluator
- Reviewing and providing comments of the draft evaluation report
- Approving the final draft of the evaluation report
- Participating in Post-Trip Debriefing
- Including USDOL evaluation contract CORT on all communication with evaluators

Implementing Organization is responsible for:

- Reviewing the TOR and providing input, as necessary
- Providing project background materials to the evaluator
- Participating in any team planning meetings
- Preparing a list of recommended interviewees
- Scheduling all meetings for field visit and coordinating all logistical arrangements
- Reviewing and providing comments on the draft evaluation report
- Organizing and Participating in the stakeholder debrief
- Including USDOL Program Office on all communication with USDOL Project Manager and/or evaluator

VII. Evaluation Methods

Performance shall be assessed in terms of six criteria: relevance and strategic fit; validity of project design; project progress and effectiveness; efficiency of resource use; impact orientation and sustainability of the project; and effectiveness of management arrangements.

The evaluation shall draw on six methods: 1) review of documents, 2) review of operating and financial data, 3) interviews with key informants, 4) field visits, 5) a stakeholder debrief in-country, and 6) a post-trip meeting.

Document Review: The evaluator will review the following documents before conducting any interviews or trips in the region.

- The Project Document
- Quarterly Progress Reports
- Reports on specific project activities
- Training materials
- Reports of trips, field visits, meetings, needs assessments and other reports
- Strategic Framework, PMP, & performance indicators
- Work plans
- Any other relevant documents

Review of operating and financial data

Interviews with key informants: Interviews are to be conducted with key program stakeholders (by phone or in-person) including (but not limited to):

- ILO national staff, including the project's Chief Technical Advisor

- Representatives of relevant ILO Departments in Geneva (LAB/ADMIN, DIALOGUE, Better Work, ACTRAV, ACTEMP, NORMES)
- ILO sub-regional office in Thailand
- Representatives of relevant trade union stakeholders (International Trade Union Confederation, ITGLWF, and other key international trade union organizations as appropriate)
- Current or Prospective international buyers for the Bangladeshi RMG sector
- Members of the BGMEA, BKMEA and other related employer organizations
- Trade union representatives in Bangladesh
- Owners/managers of individual ready-made garment factories
- Participants of the project’s training seminars
- Enterprise-level union representatives
- USDOL Project Manager(s)
- US Embassy Labor Attachés
- Other donor representatives who have been involved with the project

Field work in Bangladesh: The evaluator should also plan to meet with worker and government representatives off-site, in addition to any on-site meetings that may occur at the factories. The evaluator is expected to meet with a wide range of stakeholders, including individuals from the unions operating in and around the sampled facilities, workers of those firms, government inspectors, employer associations, and civil society organizations. The evaluator will base his/her evaluation primarily on information obtained through these field visits and interviews. The evaluator should note how key informants were selected and how the selection may influence findings.

The exact itinerary will be determined later based on scheduling and availability of interviewees. Meetings will be scheduled in advance of the field visits by the project staff, coordinated by the designated project staff, in accordance with the evaluator’s requests and consistent with these terms of reference. *The evaluator should conduct meetings without the participation of any project staff.*

Stakeholder debrief in Field: Prior to departure from Bangladesh, the evaluator will conduct a debrief workshop with staff and key stakeholders from the projects to present preliminary findings, in consultation with USDOL and depending on the schedule of the evaluator.

Post Trip Debrief & Meeting: Upon return from Bangladesh, the evaluator will provide a post-trip debrief by phone or in person to relevant USDOL staff to share initial findings and seek any clarifying guidance needed to prepare the report. Upon completion of the report, the evaluator will provide a debriefing to relevant USDOL staff on the evaluation findings, conclusions, and recommendations, as well as the evaluation process. In discussing the evaluation process, the evaluator will clearly describe the constraints generated by the retrospective nature of this evaluation methodology and data collection and how those constraints could be avoided in future projects.

VIII. Duration and Milestones of Evaluation

Activity	Date	Products/Comments
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Prepare TOR	July 20-25	Draft TOR
Pre-meeting (calls) with USDOL	July 22-24	By phone
Preparation: Doc reviews, methodology, data collection instruments	July 20-31	-Final eval. questions -Methodology section -Instruments
Fieldwork in Bangladesh	August 3-21	NA
Stakeholder meeting with projects	August 20	Stakeholder presentation
Debrief call with USDOL	August 27	NA
Analysis and report writing	August 24- September 11	Draft Report
Send first draft report for 48 hour review by USDOL	September 14	Draft Report 1
48 hour review comments due	September 16	
Disseminate second draft report to donor and key stakeholders for 2-week review	September 18	Draft Report 2
2-week review comments due	October 2	
Send final report	October 10	Final Report

IX. Deliverables

- A. Finalized TOR with projects' consensus, July 31.
- B. Method to be used during field visit, including itinerary, July 28.
- C. Pre-trip meeting / phone call, by July 22-24.
- D. Stakeholder workshop (including slides of initial findings), by August 20.
- E. Debrief call, August 27.
- D. Draft Report by September 14.
- E. Submit final report to USDOL and grantees by October 10.

X. Report

The evaluator will complete a draft report of the evaluation following the outline below and will share it with the USDOL COTR, USDOL Project Manager(s), and implementing organization who will review the report. USDOL and the implementing organization will have one week (five business days) to provide comments on the draft report. The evaluator will produce a re-draft incorporating the USDOL and implementing organization comments where appropriate, and provide a final version within three days of having received final comments.

The final version of the report will follow the format below (page lengths by section illustrative only) and be no more than 30 pages in length, excluding the annexes:

Report

1. Title page (1)
2. Table of Contents (1)
3. Acronyms (1)
4. Executive Summary (2)
5. Background and Project Description (1-2)
6. Purpose of Evaluation (1)
7. Evaluation Methodology (1)²⁰
8. Project Status (1)
9. Findings, Conclusions, and Recommendations (no more than 20 pages). This section should be organized around the TOR key issues and include findings, conclusions and recommendations for each.

Annexes

1. Terms of reference
2. Strategic Framework
3. Project PMP and data table
4. Project Workplan
5. List of Meetings and Interviews
6. Any other relevant documents

²⁰ This section should include a discussion of how future projects of this nature could be implemented to allow for evaluation methods that can more confidently assert causal impacts.

ANNEX B: Interview Guide

Below is the general interview guide that was modified and used for the specific interviews with stakeholders.

- 1) Is the project relevant to your current priorities and needs? Do you think it is meeting the needs of the RMG sector in the country?
- 2) What results can be attributed directly to the project?
- 3) What impact do you think the project has had on the RMG sector and on workers?
- 4) What do you consider are the most important lessons learned in implementing the X project?
- 5) How would describe the effectiveness of the management structure in the X project?
- 6) Do you think the current USDOL portfolio of projects is meeting the needs in the RMG sector? What future investments or projects should USDOL invest in/support?
- 7) How do you think USDOL can improve the effectiveness of its programs?
- 8) How do you think USDOL can improve the efficiency of its programs?
- 9) What additional actions can be taken by USDOL to ensure that the impact its projects are sustained?

ANNEX C: List of Documents Reviewed

1. Project Documents (all projects)
2. Performance Monitoring Plan (all projects)
3. Workplans (all projects)
4. Technical Progress Reports (all projects)
5. SC F&BS Logical Framework
6. ILO and SC F&BS Project Data-Tracking Tables
7. Project budgets (all projects)
8. FPRW midterm and final evaluations
9. Cooperative Agreement ILO F&BS Project
10. Management Program Guidelines 2010
11. Management & Procedures Guidelines 2013 for OTLA CAs
12. FMCS Trip Reports (September 2012, December 2012, July 2013, December 2014)
13. Inter-Agency Agreement USDOL/FMCS
14. Solidarity Center F&BS Project Training Curriculum
15. Bangladesh Labor Assessment (USAID 2014)
16. USDOL Strategic Framework for RMG Sector in Bangladesh
17. USDOL Project Revision Form (Better Work)
18. Indonesia Cluster Evaluation for Child Labor Projects
19. International Labor Organization Bangladesh website (www.ilo.org/dhaka/lang--en)
20. Accord website (www.bangladeshaccord.org)
21. Alliance website (www.bangladeshworkersafety.org)
22. Bangladesh MOLE/DOL Union Registration System (www.dol.gov.bd)

ANNEX D: List of Persons Interviewed

This page has been left intentionally blank in accordance with Federal Information Security Management Act (FISMA) of 2002, Public Law 107-347.