

**Almizan Advisors**

**ENDLINE EVALUATION**

**For the Consultancy to provide third-party MEL services for GoodWeave’s “Addressing Modern Slavery in the Bangladesh RMG Sector: Closing the evidence gap and informing solutions”**

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## Acronyms

BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BLF	Bangladesh Labour Foundation
CAP	Corrective Action Plans
CSDDD	Corporate Sustainability Due Diligence Directive
DAC	Development Assistance Committee
DIFE	Department of Inspection for Factories and Establishments
EU	European Union
GWI	GoodWeave International
HO	Home Office
ILO	International Labour Organisation
MEL	Monitoring, Evaluation and Learning
MSIF	Modern Slavery Innovation Fund
MTR	Mid-Term Review
NGO	Non-governmental Organisation
OECD	Organisation for Economic Co-operation and Development
RF	Results Framework
RMG	Ready-made garment
ToC	Theory of Change
UK	United Kingdom

## Executive Summary

This report contains findings and recommendations arising from an endline evaluation of Goodweave International's (GWI) project in Bangladesh: "Addressing Modern Slavery in the Bangladesh RMG Sector: Closing the evidence gap and informing solutions". The United Kingdom's (UK) Home Office (HO) funded the project via the UK Modern Slavery Innovation Fund (MSIF). GWI and its implementing partners delivered the project in Bangladesh, over 27 months, between January 2023 and March 2025. The project aimed to establish a comprehensive evidence base of risk, prevalence, and root causes of modern slavery in Bangladesh's ready-made garment (RMG) industry, emphasizing conditions in export production. It focused on subcontracted and informal components of export-oriented supply chains.

As GWI's independent, third-party monitoring, evaluation and learning (MEL) provider, Almizan Advisors conducted this endline review between January and March 2025. This evaluation builds on and updates Almizan's earlier MEL advisory service, including a midterm review completed in July 2024. The endline evaluation methodology aligns with Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) criteria, using questions specifically adapted to this context, project and MSIF aims. The evaluation also drew out learning. Data collection tools included a review of available documentation, 12 key informant interviews with the GWI team, partner organisations and representatives of participating brands and suppliers in Bangladesh. Site visits were not included, in line with evaluation goals and the methodology agreed with GWI, however GWI and partners provided the relevant information. Key findings are summarised next, against each evaluation criterion.

### Relevance

The project was relevant and timely when launched, and its relevance only increased with time, due to both internal and external factors and developments. Firstly, GWI chose a project objective (focused on subcontracted supply chains) that addressed a problem that is an increasing priority for key actors in the sector, i.e., demonstrating greater accountability within whole of the supply chain. Secondly, once the project launched, the GWI team and its partners invested a substantial amount of time, effort and attention in ensuring maximum relevance in this context. They overcame challenges in gaining access to subcontracted supply chains, extended project coverage to Chattogram, and restructured the supply chain assessment component to pilot a newly developed risk-based approach and methodology. Finally, the sudden political transition in Bangladesh in August 2024 opened up the space (at least for the moment) to discuss working conditions in the RMG supply chains with greater openness and transparency.

### Coherence

GWI takes a highly coherent approach to its programming in general and to this project specifically. The coherence is safeguarded through the GWI Generic Standard and Guidelines, which are aligned with the relevant international norms and standards. Consistent use of the standard across projects then facilitates coherence in programming, as different donor-funded projects can pick up where previous projects left off. This has been the case in Bangladesh, where the MSIF project built on the inroads made through previous interventions and has also been positioned to feed into future programming.

### Efficiency

The project was delivered on time and on budget, supported by consistent and adaptive financial planning that prioritised efficient budget spend and ensured that any delays and changes to project components were reflected in the financial forecast and remained within the overall budget allocation. Although the project was able to deliver within its overall timeframe, the supply chain assessment component was delayed as a result of the introduction of a new methodology (the risk-based approach). While the new methodology ultimately benefited the project in terms of relevance, effectiveness and sustainability, this choice came with a trade-off in terms of efficiency and the need to restructure the component delivery to be able to deliver against the workplan.

### Effectiveness

The project has demonstrated effectiveness in delivering against all of its outputs as defined in the RF. There was also positive evidence of progress towards the delivery against three of the project outcomes at the time of writing but the timing of the evaluation did not allow for a full assessment. Under Outcome 1, the evaluation found that both the participating brands and suppliers were open to the findings of the supply chain assessment and have given positive feedback on technical assistance offered to address identified systemic gaps. However, the brands showed signs of struggling to act on recommendations from a risk-based assessment when compared to the more straightforward process of remediation of modern slavery survivors. We assess, nevertheless, that systemic prevention has strong potential to improve work conditions at scale (see Impact); moreover, the risk-based approach brought collaborative approach to supplier engagement, while also, as this project proved, allowing for effective individual case identification and remediation, during shorter site visits. Under Outcome 2, the awareness raising component showed promising results: video products to increased workers' knowledge of their rights, and as an unexpected, positive effect, the training sessions in which videos were shared motivated workers to seek support to remediate issues. And under Outcome 4, the research component delivered rigorous findings, documenting the presence of child labour in the RMG supply chains, which key stakeholders in-country seemed significantly more open to acknowledging and addressing.

The project further demonstrated effectiveness by reaching a wide and diverse array of target beneficiary groups, including Tier 1 and 2 suppliers, female, adolescent and child workers engaged in subcontracted and mixed-production facilities, and home-based workers, as well as key government stakeholders and counterparts. A major contributing factor to the overall effectiveness has been the strong partnerships and close collaboration that GWI established with experienced and well-embedded organisations, in particular on the ground in Bangladesh.

### **Impact**

The project has demonstrated a strong impact potential under the MSIF Outcomes 5 and 2, in generating and disseminating knowledge and evidence, across activities, but in particular through the research component, and through strengthened relationships between suppliers, at-risk workers and local organisations specialising in issues affecting the RMG supply chains. The impact could be further strengthened through wider research and learning dissemination, including about the application of the risk-based approach to supply chain assessment.

Activities directly targeting beneficiaries, like the supply chain assessment, technical assistance to brands and suppliers, awareness raising and remediation have been implemented to a high standard of quality and effectiveness, but their impact potential is limited by the short project duration and their limited scale. Preventative measures by brands and suppliers, which the project has been assisting with, could extend the project impact if put in place but findings of this evaluation indicate that more time and assistance is needed for this to be the case. To overcome the limitation of scale, GWI would need to reconfigure some of the activities, for example by popularising awareness raising videos through a social media campaign, in addition to in-person training sessions.

### **Sustainability**

Although the project has delivered on all of its contractual commitments under this funding, the availability of follow-up funding (from MSIF or otherwise) will play an important role in ensuring that progress reaches its full potential (effectiveness and impact) and benefits are sustained. This applies most strongly to the opportunity facilitated by the current political climate in Bangladesh for wide dissemination of the research findings and to the need for continued technical assistance to brands and suppliers, which was already partially secured at the time of writing through a grant from the Walt Disney Foundation.

Methodologies and products developed as part of the project will remain accessible after the project close, available to GWI in future programming and embedded with local partners. In particular, the team at Impactt Limited is now able to deploy the risk-based approach to supply chain assessment outside of this project and Awaj Foundation retains access to the training videos developed with the project funding.

### **Recommendations**

For projects that continue the work initiated under this project:

**1. Leverage research findings into advocacy based around actionable recommendations.**

Research findings produced under this project were well received by a wider audience and key stakeholders. To ensure that the research leads to a change in the RMG sector, a consultative and participative approach is recommended to work together with stakeholder groups to develop actionable recommendations and advocate for their uptake with key actors. GWI with its strong reputation and proven track record in evidence building is in unique position to capitalise on the outcomes of the research.

**2. Seize the opportunity for closer interaction with the government authorities in Bangladesh as long as the permissive political climate remains in place.**

During the initial findings dissemination, key government stakeholders have shown a willingness to continue engaging on the issues raised in the report, which is an opportunity GWI is well-placed to capitalise on.

**3. Facilitate more in-depth capacity building for Tier 2 suppliers.**

Experience on this project has confirmed that subcontracted suppliers tend to have lower technical capacity and need closer engagement to be able to address structural and systemic gaps.

**4. Work with participating brands to identify ways in which they can act on recommendations generated through risk-based supply chain assessment.**

While brands have become increasingly familiar with remediation of identified survivors of modern slavery, they lack tools and awareness on how to work with their suppliers on structural and preventative measures.

**5. Use the wealth of knowledge, evidence and insight generated by the project to inform an integrated programming approach.**

There is complementarity between the three workstreams that could be leveraged so that different lines of activity more explicitly inform each other. (E.g. Prevention activities informed by risk-based assessment.)

For future programming in Bangladesh:

**6. Continue to engage in locations outside of the Dhaka division, in particular Chattogram.**

Evidence generated through the project has confirmed that Chattogram has a high presence of subcontracted supply chains and therefore risk factors for the presence of forced and child labour.

**7. Ensure interventions plan for a sufficient inception period.**

The rigorous approach to programming preferred by GWI that emphasises relevance and coherence is also time-intensive, especially in the initial stages of a project.

# I Introduction

## I.1 Project background

The project under review, ‘Addressing Modern Slavery in the Bangladesh RMG Sector: Closing the evidence gap and informing solutions’, is funded under the phase 3 of the Modern Slavery Innovation Fund (MSIF) established by the United Kingdom’s (UK) Home Office (HO). The project is delivered in Bangladesh by GoodWeave International (GWI) and its partners including the Rights Lab at the University of Nottingham, Bangladesh Labour Foundation (BLF), Impactt Limited and the Awaj Foundation. Project implementation began in January 2023 and ended in March 2025 (27 months).

The project aimed to establish a comprehensive evidence base of risk, prevalence, and root causes of modern slavery in Bangladesh’s ready-made garment (RMG) industry, emphasizing conditions in export production and focusing on subcontracted and informal components of export-oriented supply chains.

The work was delivered through three principal workstreams:

- (1) Community-based research, directly targeting workers residing around selected production hubs, in the Dhaka division and Chattogram.
- (2) Supply chain assessments, accompanied by technical assistance to four brands and their suppliers.
- (3) Prevention activities delivered directly in at-risk communities.

The project has a theory of change (ToC), and a results framework (RF) built around four outcomes. These are covered in detail in section 2 of this report.

In January 2023, GWI contracted Almizan Advisors to act as a third-party monitoring, evaluation and learning (MEL) service provider on the MSIF project. The MEL services have comprised a review of the project MEL framework (completed in March 2023), a mid-term review (MTR, finalised in July 2024) and an endline evaluation delivered at the end of the project in March 2025.

## I.2 Evaluation scope and methodology

The evaluation adopts the established approach of assessing the intervention through the lens of six Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) evaluation criteria, as detailed in the Table I below. Where relevant, the evaluation team incorporated and built on findings developed during the MTR conducted in 2024, updated and contextualised through a follow-up round of interviews with key project implementers and stakeholders. The evaluation team also relied on data collected by the GWI MEL team and other project partners against the project RF and other relevant assessment and materials made available by GWI. A set of key findings against each of the criteria is presented in section 2 of this report.

Table I Evaluation research questions

	OECD DAC criteria	Endline evaluation questions
1	Relevance	<ol style="list-style-type: none"> <li>1. What have been the major contextual shifts in the targeted geography (Bangladesh) and sector (RMG) and how (if at all) have these developments affected the relevance of the intervention?</li> <li>2. Was the intervention successful in engaging the right stakeholders, partners and participants in relevant geographies?</li> <li>3. In hindsight, was the intervention design appropriate to its objectives and what (if anything) could have been designed differently?</li> <li>4. What have been the major changes to the intervention design over its lifespan, what is the rationale behind these changes and what effect have they had?</li> </ol>
2	Coherence	<ol style="list-style-type: none"> <li>5. Is the intervention coherent with other GWI programming and with the relevant international norms and standards that GWI subscribes to?</li> </ol>



		6. To what extent has the intervention been consistent with other actors' interventions within the RMG sector in Bangladesh?
3	Efficiency	7. Was the intervention successful in delivering all anticipated outputs in a timely manner against the workplan? If not, what were the main causes behind the delays and how did the implementing team deal with their impact? 8. Was the intervention delivered in keeping with the budget, what were the main reasons behind a significant under/overspend (if any) and how was it handled? What (if any) economies were identified and implemented by the delivery team?
4	Effectiveness	9. Was the intervention successful in reaching its output-level targets as identified in the RF and to what extent is it on track to reach its outcome-level targets? 10. What were the main factors affecting the intervention's ability to deliver against its targets, both positively and negatively? 11. Was the project successful in reaching all its main target beneficiary and research groups? 12. Did the main assumptions against the four project outcomes hold? Why yes, why no?
5	Impact	13. Given its performance to-date and broader contextual dynamics, what is the estimated potential of the intervention to contribute to longer-term higher-level effects? 14. Have there been any (positive or negative) unintended outcomes as a result of the intervention?
6	Sustainability	15. Will any of the activities continue beyond the original project duration (e.g. with alternative funding) and which (if any) benefits generated through the intervention will continue beyond the project duration? 16. What systemic changes would have to take place for the benefits generated by the project to be sustained beyond the project duration?

Additionally, the evaluation team sought to capture learning from project implementation and implications for (potential) future programming. Section 4 of the report sets out the conclusions and section 5 presents the recommendations.

The evaluators interviewed members of the GWI team and partner organisations and representatives of participating brands and suppliers in Bangladesh. Interviews took place between 12 February and 18 March 2025. A full list of reviewed documents and interviews can be found in Annex I.

Preliminary findings were shared and discussed with the GWI team on a Teams call on 24 March 2025.

### 1.3 Limitations

The evaluation was subject to a small number of limitations detailed below:

- **Evaluation timing.** The evaluation was conducted between January and March 2025, in the final three months of project implementation. Activities were ongoing, and the final quarterly report was not yet available. The evaluation team interviewed project stakeholders to build out the picture, and this report indicates where data was missing.
- **Virtual interviews.** In line with the evaluation goals, interviews were conducted virtually. The evaluators did not do on-site verification, but GWI and its partners provided the relevant information. This approach is in line with evaluation standards, but it means the evaluation report does not include more observational data.

## 2 Evaluation Findings

### 2.1 Relevance

#### 2.1.1 Key Findings

1. **Project maintained focus on its original objective: establishing a comprehensive evidence-base of risk, prevalence and root causes of modern slavery in Bangladesh's export-oriented RMG industry.**
2. **GWI's targeting of subcontracted supply chains was relevant and became increasingly so. Across the sector, actors are pushing for greater visibility and accountability within the lower tier supply chains.**
3. **Also enhancing relevance, the project extended coverage beyond Dhaka to Chattogram<sup>1</sup>, evidenced and brought attention to the elevated presence of risk of modern slavery in production hubs outside of the Dhaka division.**
4. **Foundational shifts in the political landscape in Bangladesh over the course of 2024 have led to instability but also opened new spaces for advocacy. GWI's planned dissemination of research findings in the project's final phase is even more relevant in this new context.**
5. **GWI's shift to a risk-based approach allowed for a more systemic capture of gaps, rather than more narrowly assessing for individual victims of modern slavery and instances of non-compliance. Brands and suppliers appreciated the technical assistance received but feel they need more of it to be able to address the issues identified.**

#### 2.1.2 Detailed narrative

##### Project approach and objectives

The principal project objective has remained the same since the proposal stage: to 'establish a comprehensive evidence base of risk, prevalence, and root causes of modern slavery in Bangladesh's RMG sector'.<sup>2</sup>

In this project, GWI has opted to focus on a particular aspect of modern slavery (an umbrella term rooted in the UK legislation) that it defined as 'forced and child labour in the outsourced supply chain'.<sup>3</sup> The project has particular focus on subcontracted supply chains (see definition in Box 1) and in its second year introduced a risk-based approach to forced labour identification (defined below).

Three workstreams contribute to the achievement of the project objective:

*Box 1 Definition of a subcontracted supply chain*

##### **Subcontracted/outsourced supply chain**

The definition of a 'subcontractor' adopted by GWI on this project is 'external entity or individual providing services to a supplier'. As per the definition, they are located off-site from the supplier they are subcontracted to and constitute a separate legal entity. They either manufacture or process products under contract between two other entities and can be used by any tier in the supply chain – e.g. providing additional manufacturing capacity to a Tier 1 factory, or component processing services for Tier 2.

<sup>1</sup> Chattogram is the official name of Chittagong, the second largest city in Bangladesh after Dhaka. The city was officially renamed in 2018 but 'Chittagong' is still widely in use and the two names are used interchangeably. This evaluation refers to the city by its official name, although both versions can be found in project documentation.

<sup>2</sup> See Part C Technical and Professional Capability of the project proposal and Quarterly Reports submitted by GWI

<sup>3</sup> See the MTR p.12-13 for more detail

1. **Supply chain assessment and technical assistance:** Collaborating with brands and their suppliers to detect risk factors for forced and child labour in their supply chain and to address the identified gaps. The workstream was implemented in partnership with the Dhaka-based team of Impactt Limited in Dhaka and Chattogram.
2. **Prevention:** Raising awareness among at-risk workers on their labour rights and available support services. Implemented in partnership with the Awaj Foundation, a Dhaka-based Non-governmental Organisation (NGO) in Dhaka and Chattogram
3. **Research:** Producing a study on modern slavery and child labour within the RMG industry in Bangladesh, through quantitative and qualitative data gathered from communities of at-risk workers, in Dhaka and Chattogram. Implemented in partnership with the Rights Lab at the University of Nottingham and the BLF, a Dhaka-based NGO.

### Targeting of subcontracted supply chains

GWI has consistently emphasised targeting of subcontracted supply chains and of at-risk workers employed in the lower tier factories. This choice was relevant to MSIF objectives for several reasons. In general, brands have less visibility into their subcontracted supply chains and Tier 2 factories tend to be subject to fewer audits and third-party assessments.<sup>4</sup> There is, however, an increasing pressure on brands to extend their due diligence to their whole supply chain, including lower tier suppliers. Brand representatives interviewed for this evaluation referred to the European Union's (EU) Corporate Sustainability Due Diligence Directive (CSDDD) as their most current concern. The directive was adopted by the EU in June 2024, while the GWI project was ongoing, and the EU Member States have until July 2026 to pass it into national laws.<sup>5</sup>

GWI's targeting within supply chains nevertheless required substantial persistence and effort throughout the project, particularly during the inception period and early implementation. GWI invested time and focus, during year one, to establish a shared understanding of key terms across actors, in particular the BLF data collection team and the suppliers participating in the supply chain assessment.<sup>6</sup> Additional measures then ensured delivery was relevant to the project focus:

- **Under the research component**, the team used purposive sampling: i.e., they identified research sites with the highest likelihood of subcontracted worker presence, verified through field visits and continuously adjusted site data collection targets, to ensure enumerators spent their time in areas most relevant to the research objective.
- **Under the supply chain assessment**, the team undertook a multi-step supply chain mapping and verification process to identify and secure access to Tier 2 facilities<sup>7</sup>.

### Geographical targeting: Dhaka and Chattogram

The initial project proposal only proposed to cover RMG production hotspots in the greater Dhaka area identified through earlier research. During the inception period, GWI decided to expand the reach of the project to Chattogram, the second-largest city in Bangladesh and an RMG manufacturing hub that nevertheless lacks government attention and international visibility and for which no baseline data on working conditions in export-oriented supply chains was found in the initial review.

Including Chattogram added complexity to project implementation. GWI lengthened the data collection period for the research component, to allow the BLF enumerator team to travel and spend time in the city. Meanwhile, the Impactt site assessment team traveled to two districts in Chattogram to conduct a rapid assessment of two Tier 1

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<sup>4</sup> One interviewed supplier estimated that Tier 2 factories within the overall conglomerate he represents are subject to 50% fewer audits compared to the Tier 1 sites.

<sup>5</sup> 'Time to get to know your supply chain: EU adopts Corporate Sustainability Due Diligence Directive', <https://www.whitecase.com/insight-alert/time-get-know-your-supply-chain-eu-adopts-corporate-sustainability-due-diligence> accessed on 25 March 2025.

<sup>6</sup> See the MTR p.13 for more detail

<sup>7</sup> Tier 2 factories are subcontracted to the Tier 1 (supplier) factories that supply the finished product to the customer brand. Tier 2 and lower tier factories form the subcontracted supply chain.

sites and a full assessment of two Tier 2 sites. (The third partner, Awaj, already had an established presence in Chattogram.) GWI and partners confirmed that Chattogram had a high presence of Tier 2 and subcontracted factories and a higher prevalence of the risks of forced and child labour, compared to Dhaka.

### **Transformed political landscape in Bangladesh**

The project duration between 2023 and early 2025 has coincided with a dramatic political transformation at the national level. After 15 years as the Prime Minister, Sheikh Hasina was forced to resign and flee the country in August 2024, following mass protests. Since then, an interim government, led by Muhammad Yunus, a prominent public figure and a Nobel Peace Prize laureate, has been put in place. The intervening period has been characterised by societal unrest, high inflation and challenges to law and order—but also an opening of dialogue between the government and its population on a range of issues. In relation to the RMG sector, a Labour Reform Commission established by the new government is engaging with the leaders of trade unions, and the government has met workers' demand for an increased wage increment.

These developments came at an opportune moment for this project. GWI and partners released a research report that contradicted the previous government's claim that there is no child labour present in the export-oriented RMG supply chains. The MTR had flagged that report dissemination to the relevant government bodies could have raised risks to the project, but concerns lessened with the new government. There are encouraging signs that a more open dialogue might be possible. GWI reported that during the in-country findings dissemination, officials from the Ministry of Labour and Employment did not push back on evidence of child labour in subcontracted export-oriented supply chains and were open to future collaboration in addressing the issue.

### **Introduction of a risk-based approach to forced labour identification**

The risk-based approach to forced labour identification in the export-oriented RMG supply chains was developed by GWI for Bangladesh under separate funding from the ISEAL Alliance. The work on the initial risk assessment began in September 2023 (Q3 of the MSIF project) and the full methodology was finished in February 2024. As the first wave of supply chain assessments under this project had not yet begun as of July 2024 (see *Efficiency* section 2.3), GWI decided to postpone it until Q4 and to use the supply chain assessment as a pilot for the risk-based approach.

This decision significantly shifted the way GWI pursued the MSIF project's focus and goals. Supply chain assessments no longer aimed, as the focus, to screen for individual instances of modern slavery. (However, instances also were identified and remediated, through the partnership structure.) Rather, GWI took a more systemic view, by screening for **risks** of forced and child labour. (See Box 2 below.) This was a novel way of approaching the specific, relevant problem set in Bangladesh.

Risk focus implies *mitigation*: i.e., preventing the risk from materialising to the extent possible (likelihood); and having systems in place to reduce harm, when it does (impact). GWI appropriately shifted activities to reflect this principle. Project resources were reprogrammed from the proposal's focus on individual remediation (impact), to structural and systematic prevention (likelihood). The next section expands on why reprogramming, in this way, was ultimately the more relevant choice to project beneficiaries' needs and priorities.

Box 2 Summary of the risk-based approach

**Risk-based approach to forced labour identification**

This approach screens for known (and evidenced) risk factors of forced and child labour in the supply chain. It differs from most other auditing protocols that screen for incidence. Risk-based assessment adds value, because it puts brands and suppliers on a path to preventing incidence, in the first place.

GWJ first developed a risk assessment framework specific to the export-oriented RMG sector in Bangladesh. The framework drew on the International Labour Organisation's (ILO) 11 indicators of forced labour and GWJ Generic Standard and Guidelines. GWJ then conducted a desk review and, in collaboration with BLF, surveyed 1300 households in RMG production hubs, across the Dhaka division, to determine forced labour risk likelihood and impact. Table 1 below displays the resulting rating of forced labour risk prevalence in RMG supply chains. GWJ used the final risk assessment to produce bespoke assessment checklists that guide the screening for High and Extremely High risks (for Tier 1 and 2).

Table 2 Risk prevalence in the RMG sector in Bangladesh<sup>8</sup>

Extremely high	High	Medium	Low
<ul style="list-style-type: none"> <li>Abuse of vulnerability</li> <li>Physical and sexual violence</li> <li>Intimidation and threats</li> <li>Excessive overtime</li> </ul>	<ul style="list-style-type: none"> <li>Withholding of wages</li> <li>Abusive working and living conditions</li> </ul>	<ul style="list-style-type: none"> <li>Deception</li> <li>Restriction of movement (informal factories)</li> </ul>	<ul style="list-style-type: none"> <li>Restriction of movement (formal factories)</li> <li>Isolation</li> <li>Retention of identity documents</li> <li>Debt bondage</li> </ul>

**Impact of risk-based approach on project design and implementation**

GWJ adjusted the project design and workplan to accommodate the new assessment approach, as follows:

1. Site selection: GWJ used the risk assessment to select and prioritise Tier 2 site facilities most likely at risk of forced and child labour presence.
2. Assessment methodology: GWJ assessed sites according to their highest risk factors, which reduced on-site assessment time to one day.
3. Cancellation of the second wave of supply chain assessments: GWJ completed the first wave of supplier assessments in Q7 (July to September 2024). GWJ determined that there was not enough time left on the project for suppliers to complete the necessary structural changes and adjustments, in time for the second ('endline') wave of assessments. The second wave was cancelled and substituted for technical support (explained below).
4. Technical assistance to suppliers expanded: GWJ and Impactt identified a need for expanded technical assistance to suppliers, so suppliers would be better able to reduce risk. New activities included workshops in Dhaka and Chattogram, individual assistance and follow-up visits.
5. Pilot of the risk-based approach as a form of trialling: GWJ originally proposed to test trialling in this project. At MTR stage, GWJ and Almizan agreed that this was not practicable or likely to add value.<sup>9</sup> Instead, GWJ decided to pilot the risk-based approach.

**Changes to the MEL system**

Because of the shift detailed above, GWJ revised the ToC and related indicators in the RF. GWJ's revisions responded to MTR recommendations. The new RF focuses on at-risk workers and risk factors of forced and child

<sup>8</sup> Table has been adapted from Annex 1 of the ISEAL report.

<sup>9</sup> See MTR p.15 for more details

labour, per the new risk assessment approach. The full list of revisions can be found in Annex 2. We assess changes to be relevant, despite overlaps created between Outcomes 2 and 3 key performance indicators.<sup>10</sup> This evaluation addresses the project's preventative focus, under Outcome 2, and remediation services, under Outcome 3.

### Relevance of the risk-based approach

This approach fits the export-oriented RMG sector in Bangladesh. The export-oriented sector is massive, with 4000 registered factories<sup>11</sup>, and factory size often exceeding 1000 workers, even in the lower tiers. A risk-based approach helps in situations where it is unreasonable to screen large-scale production facilities, for workers in modern slavery.

### Integration of the project design

The original project design anticipated a degree of integration and cross-over between the three workstreams, for example by introducing a trial-based approach to the prevention programming or by extending remediation services to victims of modern slavery identified through the research exercise. This has been difficult to operationalise and given the overall complexity of the project design, it is difficult to envisage how this could have been otherwise during this phase of programming.

GWJ did, however, lay a strong foundation for a more integrated approach in future programming through:

1. An established record of collaboration among delivery partners (see Effectiveness): Particularly between research and prevention components, where Awaj (already present in RMG communities through its network of workers' cafes) was able to consult on targeted locations most likely to contain workers from subcontracted factories and later on contributed to the analysis of findings.
2. A coherent approach to programming (see Coherence below): The workstreams might not have had a lot of interaction with each other but they all worked with the same concepts, definitions and to the same standards.
3. Complementarity among workstreams: The three components have been working towards the same goal in complementary ways, more so following the introduction of the risk-based approach. The supply chain assessment has been screening for structural and embedded issues and working with factories and brands towards prevention, the community-based research has brought a fuller understanding on the scale of issues faced by workers by interacting with them outside of the factories and the prevention component has explored the interaction between awareness raising and remediation pathways in the legal space.

There is therefore a substantial potential for integration in future programming, e.g. by leveraging the research findings into more in-depth work with brands on improving audits or by aligning awareness raising more explicitly with the most prevalent risk factors, and the GWJ team has expressed interest in exploring opportunities for stronger integration in project design going forward.

## 2.2 Coherence

### 2.2.1 Key Findings

6. **The project cohered with international norms, standards and due diligence frameworks and alignment with internationally recognised frameworks for due diligence and Bangladeshi legal framework.**
7. **This project incorporated past GWJ lessons learned. The project cohered to internal GWJ strategy.**

<sup>10</sup> Outcome 2's indicator became 'increased connection of at-risk workers to support services'. This is close to the Outcome 3 indicator, '% of at-risk workers who have been provided access to remediation services'.

<sup>11</sup> <https://www.bgmea.com.bd/page/member-list>

## 2.2.2 Detailed narrative

### Adherence to relevant norms and standards

GWJ consistently adopts a highly coherent approach to its use of terminology and approaches across all programming. Key terms used across the three components on this project were defined in accordance with the GWJ Generic Standard, which in turn uses terminology and definitions captured in the ILO Conventions and Protocols (29, 85, 105, 138, 182). The risk assessment framework underpinning the supply chain assessment was created using the ILO indicators of forced labour (see *Relevance* above) as well as the GWJ Generic Standard and Guidelines. The ILO indicators align with internationally recognized frameworks for due diligence, including the OECD Guidelines for Responsible Business Conduct. The three workstreams (supply chain assessment, prevention and research) are also aligned with the relevant Bangladeshi laws and regulations, most notably the 2006 Bangladesh Labour Act.

### Coherence with other GWJ programming

Internal coherence of the project with other GWJ programming in Bangladesh is also strong. GWJ has taken a considerate and strategic approach to developing its programming in the Bangladeshi RMG sector and there is a continuity from one project to the next, with each project building on the work that preceded it. The current MSIF project built on lessons learned from earlier projects focused on the presence of child labour in RMG supply chains funded by the Dutch government. Most notably and as already discussed under *Relevance* above, GWJ took the opportunity to pilot the risk-based supply chain assessment approach developed with funding from the ISEAL Foundation under the MSIF project. This is an example of mutually beneficial cross-pollination between projects, whereby the ISEAL project benefitted from a field-based pilot and the MSIF project gained relevance, effectiveness and impact as a result of improved methodology. So far, coherence in programming has been a major driver of sustainability for GWJ in Bangladesh. This is set to continue, with a project funded by the Walt Disney Foundation expected to include follow-up support to brands and suppliers from the MSIF project.

## 2.3 Efficiency

### 2.3.1 Key Findings

8. **GWJ and partners delivered mostly on schedule, under challenging conditions. The supply chain assessment workstream was delayed, but the logic behind redesign justified delays.**
9. **GWJ's financial management system was sound.**

### 2.3.2 Detailed narrative

#### Delivery against the workplan

The new political and security situation (see Section 2.1.2 above) affected Dhaka and Chattogram, and therefore, the project, from June 2023 onwards. For example, in October 2023, workers in the RMG sector took to the streets to demand higher wages. The situation calmed when the new government met these demands in August 2024.

Despite these unstable conditions, GWJ and partners nevertheless remained efficient in the delivery of two workstreams, and after redesigning the third, they were able to deliver efficiently to the revised schedule. Both the research and the prevention components were delivered on time, against the original workplan. GWJ redesigned the supply chain assessment (to pilot a novel approach - see below) and ultimately also delivered on schedule.

#### (1) *Supply chain assessment*

Both external circumstances and internal project-driven decisions delayed supply chain assessments. GWJ's team acknowledge that they initially underestimated the length of time needed for an inception period (three months was

too short), to prepare partners to launch assessments. Worker protests in November 2023 and the January 2024 general election introduced small delays. Finally, GWI chose to further delay assessments, because they preferred to innovate within the project (bringing in the risk based approach)—which ultimately reduced on-site assessment time, when the assessments were done.

### **(2) Prevention component**

GWI delivered this component on schedule. The project team developed videos and training materials. from early 2024. The awareness raising sessions took place between May and September 2024 in accordance with the original workplan. Awaj also accepted remediation cases for legal assistance over the same period.

### **(3) Research component**

GWI lengthened the timeframe for delivering this component, and all fieldwork was ultimately delivered within the overall project timeframe. This choice was better, from a conflict sensitivity perspective, and in terms of the quality of evidence generated. GWI navigated around protests and the election, which initially reduced access to some sites. GWI extended field data collection by two months, to allow enumerators more time in Chattogram, to gather stronger evidence about the differing risk profile to Dhaka. GWI and partners used tablet-assisted data collection and SurveyCTO software, which allowed the research team to deliver on time.

### **Delivery against the budget**

GWI reports spend to the donor, monthly. Quarterly variance was generally between -4% and -8%. At the time of writing in March 2025, the forecast was full budget spend.

Project implementation prioritised an efficient spend of resources. The team has ensured that savings were channelled back into activity implementation, pushed to maximise the value generated from existing budget (e.g. by extending fieldwork to an additional location, see above) and by identifying cost-sharing opportunities with other GWI-implemented projects in Bangladesh (e.g. the risk-based approach, which was developed and formulated under separate funding from the ISEAL Foundation).

## **2.4 Effectiveness**

### **2.4.1 Key Findings**

- 10. The project has delivered against all of its outputs.**
- 11. GWI and partners maintained strong partnerships, on the ground, which helps to explain project effect.**
- 12. Participating Tier 1 and Tier 2 suppliers accepted assessment findings and positively reviewed the project team's help to start addressing systemic gaps.**
- 13. Brands value GWI's support but struggled to act on the risk-based assessment, as opposed to finding and remediating cases.**
- 14. Workers who saw the awareness raising videos liked them, and their knowledge of workers' rights increased. An unexpected, positive project effect was that 13% of workers trained referred themselves to remediation services – quite a high uptake.**
- 15. GWI's partnership structure ensured research delivered was robust. National authorities said they would consider the data – a huge change, in this context, for which GWI should be commended.**



**16. The project had wide reach: to Tier 1 and 2 suppliers; female, adolescent and child workers engaged in subcontracted and mixed-production facilities; and home-based workers, as well as key government stakeholders and counterparts.**

## 2.4.2 Detailed narrative

### Delivery against Outcome 1 (Supply Chain Assessment and Technical Assistance)

#### Output-level delivery

The project successfully delivered against all outputs under Outcome 1 (see Table 2 below for detail):

1. Supply chain mapping: Brands and suppliers provided initial insight, which GWI verified and built on.
2. Site assessment: GWI rapidly assessed and confirmed six Tier 1 suppliers' lists of Tier 2 suppliers.
3. Tier 2 assessment: GWI applied the full risk-based assessment to Tier 2 sites.
4. Reporting: GWI reported to brands, about their supply chain at Tiers 1 and 2.
5. Technical assistance: GWI helped suppliers develop Corrective Action Plans (CAPs), addressing gaps in compliance.

This process was more complex than it may appear on the surface. Securing access to Tier 2 worksites remains sensitive and challenging. It requires a seamless chain of communication: from the brand headquarters to a local representative or an agent (if applicable); from that agent to a Tier 1 supplier; and onward to the subcontractor (Tier 2 facility), which must agree to be assessed. Tier 2 suppliers tend to have limited experience with audits and assessment. This chain of communication is often interrupted or delayed, stalling the overall process. Even when an agreement is secured, access to the site is not guaranteed. For example, several Tier 2 suppliers who initially agreed to be assessed later did not facilitate site access—because they no longer had an active work order for the partner brand, by the time the assessment was ready to launch. In these cases, the sites were replaced with another Tier 2 facility to allow the project to proceed.

Table 3 Output-level results achieved under Outcome 1

Output statement		Delivery against output-level indicators
<u>Output 1.1</u> : Brands and suppliers gain visibility into their supply chains.		Produced 4 brand supply chain maps (total of 98 factories listed) and completed six Tier 1 rapid assessments (4 in Dhaka and 2 in Chattogram) and eight Tier 2 full assessments (6 in Dhaka and 2 in Chattogram).  All of the visited suppliers (14) received a report with recommendations on how to close identified gaps and the four participating brands received an assessment of their supply chain with recommendations.
<u>Output 1.2</u> : Brands and suppliers receive targeted advice and technical support based on issues identified in their supply chain.		Held two capacity building workshops in Dhaka and Chattogram attended by 12 suppliers and some of the brand representatives.  All brands provided with technical support on modern slavery policies and Standard Operating Procedures including supply chain due diligence and effective grievance mechanisms.  Suppliers produce CAPs and work on addressing gaps with technical support from the project (ongoing at time of review).
<u>Output 1.3</u> : Local partners expand their techniques and tools for identifying modern slavery		Local partner (Impactt) received training on risk-based approach to supply chain assessment in January 2024 and deployed the approach on 4 Tier 1 and 8 Tier 2 assessments under this project.

### **Outcome-level delivery**

The project made encouraging progress against Outcome 1: “Brands and suppliers improve their ability to protect workers and identify and act on instances of modern slavery through strengthened partnerships and networks”. The supply chain assessment identified significant structural gaps at several of the Tier 2 facilities. Three of eight sites for the risk assessment pilot had significant gaps (between 13 and 23 requirements not met). Four Tier 2 sites each failed one or two of the requirements; one site missed four. Gaps were mostly structural; for example, the most common were a missing or dysfunctional workers’ grievance mechanism (risk factor for intimidation and threats) and excessive overtime. One assessment found eight adolescents (under age 18) working excessive hours (Cf. Outcome 3 for remediation steps).

Participating suppliers were receptive and engaged overall, improved their understanding of risk factors of forced and child labour, and started to improve their policies and management systems. Following the two workshops in Dhaka and Chattogram, all of the participating suppliers (12 out of the total 14 suppliers assessed) gave positive feedback and were able to identify areas where their knowledge has increased. (In the words of one of the suppliers: ‘To be honest, I had no clear concept of remediation of child labour before.’) This attitude was corroborated in the two supplier interviews conducted for this evaluation. Both suppliers spoke positively of the technical assistance received to-date and were motivated to continue the engagement. Notably, this was the case even though one of the suppliers no longer had current active orders with the participating brand. Suppliers were clear that it will take time to put in place measures outlined in the CAPs and this work was ongoing at the time of the evaluation.

Similarly to the suppliers, participating brands appreciated the new visibility into issues present in their subcontracted supply chains but say they need more help from GWI to be able to act on assessment recommendations. Brand representatives interviewed for this evaluation acknowledged the Tier 2 findings as realistic and unsurprising (except for the one instance of adolescents found to be working excessive hours). All felt the assessment reports were too general to be easily actionable, though, in part because the gaps listed are not attributed to specific suppliers. This lack of attribution in assessment is deliberate and as a foundational part of the project design has been communicated to the brands throughout the project. A key commitment to the suppliers by GWI is that their commercial interests will not be affected through their participation and their identifying details therefore have to be protected.<sup>12</sup>

This evaluation finds that the hesitation of brands in actioning the recommendations made by GWI under this project reflects brands’ lack of experience with risk-based approaches rather than an actual lack of actionable detail in the assessment itself. Many brands have now become familiar with audits that screen for individual victims of modern slavery and have put in mechanisms (through partnerships with remediation partners such as the Reassurance Network) to assist the victims when identified. Brands have less experience in working with suppliers to improve policies and systems, especially at the level of Tier 2, where brands are only beginning to establish visibility. More work will need to be done with brands directly to shift this mindset and to develop ways in which they can get involved and come fully onboard with the recommendations of risk-based assessment.

### **Delivery against Outcome 2 (Raising awareness and protection for workers)**

#### **Output-level delivery**

The project was successful in delivering against outputs under Outcome 2 (see Table 3 below, for detail). Much of the prevention component directly targeting at-risk workers was delivered through Awaj Foundation.

Awaj held a total of 34 training sessions on labour rights for at-risk workers at the ‘worker cafes’ located directly in workers’ communities. To support the training, GWI (with the input of Awaj) produced four short, animated videos covering four rights issues (child labour, harassment, labour rights and overtime) in English and in Bengali.

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<sup>12</sup> According to several respondents, it is a common practice for brands customers, their agents, and Tier 1 suppliers to terminate Tier 2 subcontractors that have failed an audit. This goes against the project approach, which is based around working with the subcontractors to remedy gaps and compliance issues.

The two-hour sessions were intended for at-risk workers including women, adolescents and children, migrant workers and workers in general across all garment production modalities (Tier 1, subcontracted, informal and home-based work). Those workers, who completed the session and found that they had an issue that required remediation were invited to bring their issue to Awaj's legal clinic.

The workers participating in the training were identified and invited by Awaj through its own networks within the targeted communities. Out of the 680, 553 (81%) were women. This agrees with the desired targeting and aligns with the fact that most workers in the RMG sector in Bangladesh are women.

Awaj staff and some training participants positively reviewed the efficacy of using videos in training sessions (see below). The introduction of video content did, however, introduce a challenge for Awaj as the worker cafes serve primarily as informal spaces for the workers to gather and are mostly not equipped with computers, screens or projectors. Where possible, instructors used their own smartphones to display the video content. The relatively low number of views on Awaj's YouTube page shows that the videos were used primarily as a teaching tool and not promoted as an online resource outside of the training (Awaj does not appear to have shared the videos on its Facebook page, which has significantly more online traffic compared to its YouTube page).

In addition, prevention activity was incorporated into the research component. GWI and local partners jointly mapped free services available to at-risk workers, including one government-run and one NGO-run hotline. This information was shared with the BLF data collectors so that they could share it, in turn, with the workers they interview in their communities.

Table 4 Output-level results achieved under Outcome 2

Output statement		Delivery against output-level indicators
<u>Output 2.1:</u> Vulnerable workers participate in rights training		<p>Four short animated videos were produced in Bengali and English covering the issues of child labour, harrassment, labour rights and overtime.</p> <p>680 workers participated in the training by Awaj (533 in Dhaka division and 147 in Chattogram). Most of the workers attending training viewed the videos, with additional 500 views (across the four videos) on Awaj youtube page.</p>
<u>Output 2.2:</u> At-risk workers receive referrals to local organisations' support services		<p>Workers surveyed under the research component were given contact details for support services including a government and an NGO-run hotline.</p> <p>At-risk workers who participated in the training sessions were invited to take advantage of Awaj's legal clinic. 5,320 leaflets with information on labour rights were distributed through Awaj's network of workers' cafes.</p>

### Outcome-level delivery

There is strong, positive evidence that at-risk workers' knowledge and understanding of labour rights increased after Awaj training sessions. The pre/post test (where each worker was asked the eight questions before and after the session) showed a 54% increase in the number of correctly answered questions, from 20% answered correctly before the session to 74% after.<sup>13</sup> According to Awaj trainers' own observations, sharing training content through video led to better levels of understanding and retention compared to similar sessions with no video content.

<sup>13</sup> In 12 out of the total of 34 training groups, not one participant could correctly identify the age limit that defines the threshold for child labour in Bangladesh before the session. After the training, 69% of participants from those specific groups were able to answer correctly, a significant increase from zero before the training.

Available evidence of risk reduction through access to services is mostly in the 82 workers who participated in the labour rights' training and self-referred to the Awaj legal clinic with remediation issues. (Although hotline numbers were distributed among the workers surveyed for the research component, it was difficult to verify whether workers called the numbers.) The self-referral mechanism could be considered one of the unintended 'proofs of concept' produced by the project. The relatively high uptake (13% of training participants) combined with the serious and tangible nature of issues encountered shows that educating workers on their labour rights is a viable way forward to generate higher remediation rates.

### Delivery against Outcome 3 (Access to remediation services)

#### Output-level delivery

At the output level under this outcome, GWI sought to establish partnership with a remediation partner and ensure that all identified victims of forced and child labour were connected to relevant services. As shown in Table 4, the project has delivered successfully against these outputs.

As noted above, eight adolescent workers were found on one site to be working excessive hours. (Adolescents - defined as at least 14 years old but not yet 18 - are allowed to work up to 5 hours per day and 36 hours per week including overtime under the Bangladesh Labour Act.) GWI referred the case to the Reassurance Network, the remediation partner to two of the brands, who began to work with the suppliers on solutions to remediate all identified cases.

In addition, Awaj has been working on remediating the 82 self-referred worker complaints. Cases include illegal termination, withheld wages and unpaid benefits (severance, maternity etc.). Awaj adopts an escalating approach, first notifying the factory/buyer, then the Bangladesh Garment Manufacturers and Exporters Association (BGMEA) or Department of Inspection for Factories and Establishments (DIFE), and if necessary, filing the case in court. Twenty-three cases were filed in Chattogram in October 2024 and all but two were ongoing at the time of the evaluation, and 10 of the 59 cases filed in Dhaka had been settled between the worker and the factory without involving the authorities.

Table 5 Output-level results achieved under Outcome 3

Output statement		Delivery against output-level indicators
Output 3.1: Network of child and forced labor prevention and remediation partners is established and operational		<p>A partnership was established with the Reassurance Network as the remediation partner on the project. (Several of the partner brands on the project already have a contract with Reassurance Network as their global remediation partner.)</p> <p>All of the surveyed sites (14) were screened for the risk of modern slavery through the deployment of a risk-based approach.</p>
Output 3.2: Identified victims of modern slavery are referred to remediation partners and remediated		<p>8 cases of adolescents working excessive hours were referred to the remediation partner and are undergoing remediation.</p> <p>Based on self-referrals among the worker participants of the labour rights training, Awaj opened 82 cases that it has worked to resolve.</p>

#### Outcome-level delivery

As explained in the section on *Relevance*, GWI revised the outcome-level indicator under Outcome 3, to align with the risk-based approach to supply chain assessment, which has inadvertently created a duplication between Outcome 2 and Outcome 3.

### Delivery against Outcome 4 (Developing an evidence base)

#### Output-level delivery

The outcome was delivered at the output level through two main deliverables: the research report and the pilot of the risk-based approach to supply chain assessment. The research component ran as an independent component for the full duration of the project. It was implemented by GWI and the Rights Lab (University of Nottingham) together with the BLF and the support of Awaj Foundation. The objective was to document the existence of modern slavery and child labour within the RMG industry in Bangladesh with a secondary focus on hidden and subcontracted supply chains.

The data collection was successful in reaching a diverse range of respondents including workers outside of Dhaka (15% of respondents were in Chattogram), women (67% of all respondents), child and adolescent workers (6%, 122 individuals), workers at mixed-contract and subcontracted factories (31%) and home-based workers (4%, 75 individuals). The most significant findings of the report included:

- Confirming the presence of child labour in the export-oriented supply chains. All of the surveyed minors qualified as child labourers either due to their age or excessive working hours.
- Prevalence of insufficient wages, excessive overtime and abusive working conditions
- Confirming that subcontracted supply chains have higher presence of human rights risks (and so does Chattogram, where the proportion of subcontracted sites is higher compared to Dhaka)

These findings align with the results of the supply chain assessment under this project, which identified adolescents working excessive hours, excessive overtime among adult workers and insufficient grievance mechanisms (a risk factor for abusive working conditions) at Tier 2 sites. The prevalence of detected risk factors for forced and child labour is higher in the research study than the supply chain assessment. This conforms to the established trend whereby sensitive information is more easily accessed outside of the factory.

Challenges experienced on the research component were mostly logistical and reflected the realities of surveying factory workers in their homes (only possible in the evening and on Friday, their one day off) and the complications derived from the periodic protests over the past two years in Bangladesh (see *Efficiency* above). These were all successfully navigated by the research team but serve as a reminder of the need to allocate sufficient time to workers' surveys to account for the shortened interview window.

The final report was launched in February 2025 to a substantial virtual audience of over 600 virtual attendees as part of the OECD Forum on Due Diligence in the Garment and Footwear Sector. It was also presented to key stakeholders in Bangladesh during a weeklong mission by the GWI CEO in February (see below).

The second key deliverable under Outcome 4 has been the pilot of the risk-based approach to supply chain assessment. Key lessons captured in the lessons learned report have been:

- Risk-based approach can be used to identify Tier 2 sites likely to be at risk for the presence of modern slavery (three out of the eight assessed sites had substantial gaps and instances of noncompliance).
- The risk-based approach was helpful in finding 'hidden' Tier 2 suppliers that were not known to the participating brands and were independent suppliers to the Tier 1 buyers.
- The risk-based assessment of a site can be done in less than one day but does not cover the night shift.<sup>14</sup>
- A comprehensive root cause analysis or any type of remediation is not possible within the time it requires to conduct a risk-based assessment.

Additionally, this evaluation found (through interviews with GWI, the local partner and suppliers) that the focus of a risk-based assessment on identifying the presence of risk factors (rather than instances of direct noncompliance) and the preventative approach it takes to addressing structural gaps in policies and management systems leads to a non-confrontational and collaborative relationship with the suppliers and likely positively contributed to the effectiveness of the technical assistance offered post-assessment.

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<sup>14</sup> The second shift (often running from 19:00 to 07:00) is challenging to cover even in a multi-day non-risk based assessment as it requires the assessors to visit the factory outside of their own regular working hours.

Table 6 Output-level results achieved under Outcome 4

Output statement		Delivery against output-level indicators
<u>Output 4.1:</u> Research produced by the project fills a knowledge gap regarding the working conditions in the informal RMG sector in Bangladesh.		Research team completed 1,974 surveys and 10 FGDs with workers in 19 locations in Dhaka division and in Chattogram.
<u>Output 4.2:</u> Risk-based identification, prevention and remediation approaches produce insight on what works, where and how		GWJ produced a report summarising lessons learned from the pilot of a risk-based approach to supply chain assessment.
<u>Output 4.3:</u> Information, lessons learned and recommendations are shared with a wide range of stakeholders		<p>The research report was launched during a virtual side session as part of the OECD Forum on Due Diligence in the Garment and Footwear Sector. It was attended by 649 attendees (with 951 having registered).</p> <p>GWJ met with stakeholders during findings dissemination in Dhaka including (not a full list):</p> <ul style="list-style-type: none"> <li>• Ministry of Labour and Employment/DIFE, Ministry of Education and Planning, Labour Reform Commission</li> <li>• Development partners (Netherlands, the EU, GIZ, ILO)</li> <li>• Brand representatives in Dhaka (Delta Galil, C&amp;A)</li> </ul>

### Outcome-level delivery

The research findings dissemination was ongoing at the time of this evaluation, and testimonials from stakeholders on the utility of both the research and the pilot were not yet available. But there are encouraging signs that the research may have traction: the high level of interest in the launch session during the OECD Forum, participation of the Joint Secretary from the Ministry of Labour and Employment on the panel during the report launch, and what was described as a productive and forward-looking interaction with government stakeholders in Dhaka by both GWJ and its local partner, BLF.

As already discussed under *Relevance*, a window of opportunity has opened in Bangladesh for advocacy and meaningful progress towards elimination of forced and child labour, as evidenced by the willingness of key stakeholders to acknowledge (or at least not dispute) the presence of child labour in subcontracted supply chains.

### Role of strong and collaborative partnerships in project effectiveness

The MSIF project was launched with an ambitious design focusing on hard-to-access subcontracted supply chains in the RMG sector. It arguably crossed into over-ambition with the addition of Chattogram and the decision to pilot a newly developed approach to supply chain assessment, while the project was already ongoing. Despite this, GWJ successfully delivered three complex workstreams to a high degree of effectiveness, in a relatively short timeframe and during a politically turbulent period in Bangladesh. A key reason why was the strong and collaborative partnerships that GWJ established with its international (Rights Lab) and local partners (BLF, Impactt and Awaj Foundation).

The three local organisations have an established track record of engaging with the RMG sector in Bangladesh. They contributed to strong project performance, through:

1. **Diverse array of technical capacity and specialisation:** expertise in conducting various types of factory-based audits and assessments (Impactt), primary data collection in workers' communities (BLF) and legal resources and expertise specific to the labour rights of RMG workers (Awaj). This enabled GWI, among other things, to pilot a new sophisticated approach to supply chain assessment, at short notice, and to use a complex and dynamic sampling methodology that required effective, accurate field enumerators.
2. **Deep local knowledge and networks:** Both BLF and Awaj have background in advocacy and all three organisations engage with government stakeholders. Impactt's extensive knowledge of RMG supply chains developed through audits and assessments directly informed supply chain mapping on this project. Awaj's already established presence in RMG production hubs and knowledge of these communities facilitated the implementation of prevention activities but also assisted BLF in accessing the communities for data collection and informed the analysis that went into the research report.

In addition to the local partners, the Rights Lab at the University of Nottingham was a dedicated, professional and flexible partner. The team travelled to Dhaka twice over the project duration to finalise research tools and discuss preliminary findings directly with the BLF team and has worked closely with the GWI team to ensure that the final report is produced on schedule and speaks to the objectives of the project.

The GWI team is well aware of the value-add of these partnerships and at the time of the evaluation was working to mobilise varying funding sources to allow these partnerships to continue.

## 2.5 Impact

### 2.5.1 Key Findings

17. **The project has demonstrated a strong impact potential in generating and disseminating knowledge and evidence, across activities but in particular through the research component, which aligns with the MSIF Outcome 5.**
18. **Partnerships between suppliers, workers and local organisations strengthened under the project also positively contribute to the impact of the project and MSIF Outcome 2.**
19. **Supply chain assessment, technical assistance to brands and suppliers, awareness raising and remediation have been implemented to a high standard and degree of effectiveness, but their impact potential is limited by the short project duration and limited scale.**

### 2.5.2 Detailed narrative

#### Impact at scale (knowledge, evidence and partnerships)

The impact statement for the project states that the project ultimately seeks to (contribute) to '*Reduced modern slavery in Bangladesh's RMG sector through strengthened partnerships, improved in-country awareness and capacity and an increase in evidence-driven programming*'.<sup>15</sup>

The project has demonstrated the strongest impact potential in the areas of knowledge and evidencing and 'improved in-country awareness', which aligns with the MSIF's own Outcome 5 ('*An improved evidence-base on what works best, how and where*'). Varying degrees of knowledge and evidence have been generated through all three of the project workstreams, and the research component has already reached a sizeable audience and key stakeholders at the project close. In particular, the nascent dialogue with key government stakeholders who have so far chosen not to dispute the evidence of child labour in subcontracted supply chains has the potential to shift the discourse around the issue and thus impact the RMG sector beyond this project.

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<sup>15</sup> In a MEL framework, impact commonly refers to the highest order of a result that an organisation can contribute to through its programming but not achieve on its own. Accordingly, this section assess the likely *scale/extent* of this contribution to the impact-level result.

The project also produced two programming approaches that could be considered a proof of concept or 'evidence of what works': (1) the viability of the risk-based supply chain assessment and (2) 'self-directed' remediation among at risk workers who gained access to the Awaj legal clinic through awareness raising sessions. However, to maximise the impact potential of these proven programming approaches, they will need to be channelled into more programmes and shared and promoted among other stakeholders and implementers sectorwide.

Finally, the project also contributed to its stated impact by adopting a highly collaborative approach and fostering strong partnerships between organisations, companies and individuals. This aligns with the MSIF Outcome 2 ('Partnerships strengthened to prevent and remedy modern slavery in supply chains'). This has been a highly networked intervention, bringing together well-networked and well-embedded partners who have reached out to and engaged with a wide array of beneficiaries and stakeholders and were also able to extend their networks through this project. (E.g. By conducting research in Chattogram or through capacity building of Tier 2 suppliers.) This has a potential of strengthening future programming that GWI and its partners engage with that is not limited to future joint implementation.

### **Impact limitations (evidence-driven programming)**

The project was highly effective in engaging with suppliers, brands and at-risk workers (see the *Effectiveness* section above), and there are some encouraging signs that this might have an impact beyond the direct beneficiaries of the project. Interviewed suppliers plan to apply policies developed with project support at other Tier 2 sites they manage. Some of the at-risk workers who attended the training sessions on labour rights planned to share the video with their friends.

However, the relatively short duration and limited scale of direct activities with beneficiaries limited impact potential. In terms of the project duration: most interviewees agreed that addressing identified structural gaps in full was not possible within the project timeframe. This was particularly the case for participating brands, who were still analysing assessment findings at the time of the evaluation. They felt they needed substantially more time and assistance to make changes and ensure that the preventive effect is truly in place. Moreover, key counterparts (brand sustainability teams) changed over the project lifetime. GWI identified a lesson learned – these individuals felt they were not immediately in a position to change certain, relevant company practices. Therefore, future engagement with brands should involve their sourcing-side colleagues, who can in principle act to address issues like a lack of effective grievance mechanism for workers. However, GWI found this hard to do, on a tight turnaround, given sourcing colleagues' competing priorities, and the fact that brands need support over longer periods to introduce systemic change.

On the issue of scale, the project was only able to reach a very small proportion of actors -- whether it be brands, suppliers or at-risk workers -- engaged in the RMG sector. Some of the programming approaches would need to be reconfigured to reach a wider population, e.g. by engaging brands to integrate risk-based approaches into their own in-house and third-party auditing processes, finding ways to reach more Tier 2 suppliers with technical assistance or investing in a social media campaign to promote the training videos developed with Awaj in a format that is friendly to audiences with inexpensive phones and limited access to internet connection.

## **2.6 Sustainability**

### **2.6.1 Key Findings**

- 20. Sustainability of the project is limited. Although the project delivered on its outputs, follow-up funding (from MSIF or otherwise) will play an important role in ensuring that the results can be sustained and further developed.**
- 21. Methodologies and products developed as part of the project will remain accessible after the project close, available to GWI in future programming and embedded with local partners.**



## 2.6.2 Detailed narrative

### Role of follow-up funding

As detailed in this evaluation, the project delivered in full against all of its outputs and made progress towards outcome-level achievement within the allocated timeframe—nonwithstanding the substantial redesign of the supply chain assessment. However, the three workstreams would strongly benefit from continued funding and engagement to ensure that progress is not lost and that the full value is extracted out of the gains made through the project. Specifically:

1. Research: While the report has now been completed and launched, it has had only limited dissemination with the relevant institutions and stakeholders in Bangladesh. As detailed above, the report has the potential to inform discourse inside and outside of the country which would require wider and more thorough dissemination, including to the surveyed workers' themselves.
2. Supply chain assessment and technical assistance – In line with 'piloting' goals, GWI successfully tested feasibility, proved concept for this approach and identified lessons learned and future refinements. Both suppliers and brands have requested more time to fully assimilate recommendations and lessons learned (see above).
3. Prevention - remediation of cases brought to the Awaj legal clinic by at-risk workers was still in progress as of February 2025.

To that end, GWI had already secured some donor funding (Walt Disney Foundation) to continue working directly with the participating brands and suppliers. MSIF decision on a one year cost-extension of the project remained pending at the time of writing.

### Approaches and methodologies embedded with local partners

Attention to sustainability was clearest in GWI's close working, with local partners, to embed all project approaches and methodologies within those partners' systems. GWI is also likely to deploy these approaches and methodologies, in future interventions. GWI's programming approach in Bangladesh has been highly coherent (see *Coherence* section above) and as such adds a layer of continuity and therefore sustainability to GWI interventions. The combined benefits would likely extend to many more RMG sector workers in Bangladesh.

Impactt was the assessor that piloted the risk-based approach to supply chain assessment. Its team has access to the tools and frameworks, has been trained on the methodology and trialed it in practice. Similarly, Awaj will retain access to the training videos developed for this project and has confirmed that it intends to draw on them in future programming. Finally, the Rights Lab have confirmed that they will be looking to expand on the findings of the research study in future research, if funding can be secured.

### 3 Recommendations

The recommendations listed below are based on the findings of this evaluation and, in particular, discussions with the GWI team. They are intended to inform any continuation of work initiated under this project and future GWI programming in Bangladesh more generally.

For projects that continue the work initiated under this project:

**8. Leverage research findings into advocacy based around actionable recommendations.**

Research findings produced under this project were well received by a wider audience and key stakeholders. To ensure that the research leads to a change in the RMG sector, a consultative and participative approach is recommended to work together with stakeholder groups to develop actionable recommendations and advocate for their uptake with key actors. GWI with its strong reputation and proven track record in evidence building is in unique position to capitalise on the outcomes of the research.

**9. Seize the opportunity for closer interaction with the government authorities in Bangladesh as long as the permissive political climate remains in place.**

During the initial findings dissemination, key government stakeholders have shown a willingness to continue engaging on the issues raised in the report, which is an opportunity GWI is well-placed to capitalise on.

**10. Facilitate more in-depth capacity building for Tier 2 suppliers.**

Experience on this project has confirmed that subcontracted suppliers tend to have lower technical capacity and need closer engagement to be able to address structural and systemic gaps.

**11. Work with participating brands to identify ways in which they can act on recommendations generated through risk-based supply chain assessment.**

While brands have become increasingly familiar with remediation of identified survivors of modern slavery, they lack tools and awareness on how to work with their suppliers on structural and preventative measures.

**12. Use the wealth of knowledge, evidence and insight generated by the project to inform an integrated programming approach.**

There is complementarity between the three workstreams that could be leveraged so that different lines of activity more explicitly inform each other. (E.g. Prevention activities informed by risk-based assessment.)

For future programming in Bangladesh:

**13. Continue to engage in locations outside of the Dhaka division, in particular Chattogram.**

Evidence generated through the project has confirmed that Chattogram has a high presence of subcontracted supply chains and therefore risk factors for the presence of forced and child labour.

**14. Ensure interventions plan for a sufficient inception period.**

The rigorous approach to programming preferred by GWI that emphasises relevance and coherence is also time-intensive, especially in the initial stages of a project.

## Annex I. Documentation reviewed and interviews conducted for the Endline Evaluation

The following interviews were conducted in support of this evaluation:

	<b>Name</b>	<b>Organisation</b>	<b>Date</b>
1	Kasia Myatt	New Look	12/02/25
2	Ismet Jarin	Awaj Foundation	17/02/25
3	Leslie Shull	Delta Galil	17/02/25
4	Sharif Islam	Impactt Limited	17/02/25
5	Jessica Wise	River Island	19/02/25
6	Ahraf Uddin	Bangladesh Labour Foundation	20/02/25
7	Anastasiia Kliuha	Rights Lab, University of Nottingham	21/02/25
8	Shahariar Mohammed Dulal	KITH Fashion	24/02/25
9	Josh Saha	Liz Fashion	27/02/25
10	Shahinur Rahman	GoodWeave International	02/03/25
11	Elisabeth Bystrom	GoodWeave International	05/03/25
12	Dan Karlin	GoodWeave International	18/03/25

And the following documents were made available by GWI and reviewed in support of this evaluation:

- Project proposal
- Original ToC and RF
- MSIF 3 Workplan (Jul 23)
- Updated RF (Q3 Oct – Dec 23), Performance Monitoring Plan (Oct 23)
- Quarterly Reports (Q4 FY 22/23, Q1, Q2 and Q3 FY 23/24)
- Rights Lab Research Update (Jan 24), Target sample size vs achieved (Mar 2024)
- Project Overview for UK Apparel Brand Partners and their suppliers and slides for suppliers (Mar 2024)
- Rights Awareness Sessions Plan
- Forced Labour Risk Assessment of the Bangladesh Ready-made Garment Sector (02/24, GWI for ISEAL)
- Complete results framework
- Research report
- Videos
- Training materials for suppliers
- Supplier feedback on capacity-building workshop
- Log of decisions during implementation
- Examples of brand and supplier assessment reports
- Supplier CAPs
- Lessons Learned report on Risk-Based Approach

## Annex 2. Summary of changes in the RF

Original	Revised
<b>Outcome 3 statement:</b> <u>Identified survivors</u> of modern slavery have access to comprehensive remediation services	<u>Workers at risk</u> of modern slavery have access to comprehensive remediation services
<b>Outcome indicator 3.1:</b> % <u>identified child and forced labourers who remain out of child/forced labour at project close</u>	% <u>of at-risk workers who have been provided access to remediation services</u>
<b>Output indicator 3.1.2:</b> # of outsourced RMG sites linked to UK brands supply chains screened for modern slavery <u>presence</u>	# of outsourced RMG sites linked to UK brands supply chains screened for modern slavery <u>risk</u>
<b>Output indicator 1.1.3:</b> # of inspected worksites where <u>noncompliance</u> is identified that receive corrective action reports	# of inspected worksites where a <u>gap</u> is identified that receive corrective action reports
<b>Output 4.2 statement:</b> <u>The trial-based programming approach</u> produces insight on what works, where and how <u>when it comes to prevention and remediation</u>	<u>Risk-based identification, prevention and remediation</u> approaches produce insight on what works, where and how
<b>Output indicator 4.2.1:</b> Examples of expanded <u>modern slavery programming</u>	<b>Output indicator 4.2.1:</b> Examples of expanded <u>approaches to identifying, preventing and remediating modern slavery</u>

### About Almizan Advisors

Almizan Advisors ([www.almizanadvisors.com](http://www.almizanadvisors.com)) is a UK registered advisory firm. We specialise in frontline and fragile contexts, where we help change behaviours that affect peace, stability, and security. We design, implement, and evaluate interventions in partnership with governments, public and private sector organisations, communities, and individuals. We hold specific expertise on transnational issues, including violent extremism/terrorism, cross-border conflict, serious organised crime, modern slavery, trafficking and migration.

Our experts have evaluated a wide range of overseas programmes and activities on behalf of donors including the United Kingdom, Denmark, the United States, the Netherlands, and the EU. We have delivered support in or on behalf of countries including Albania, Afghanistan, Australia, Bosnia, Burkina Faso, India, Iraq, Jordan, Kenya, Kosovo, Lebanon, Libya, Mali, Mauritania, Nigeria, Niger, the Palestinian Territories, Senegal, Somalia, Tanzania, and Tunisia. As a result, we hold deep insights on programming across multiple contexts and can draw on an established body of best practice and lessons learnt.