University of Nottingham
Rights Lab

Forced labour and child labour in Bangladesh's garment sector:

Documenting risks and informing solutions

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About the Rights Lab

The Rights Lab at the University of Nottingham is the world's largest group of modern slavery researchers, and home to many leading modern slavery experts.Through four research programmes, the Rights Lab works to deliver new and cutting-edge research that provides rigorous data, evidence and discoveries for the global antislavery effort. The Lab's impact team provides an interface between the Rights Lab research programmes and civil society, business and government, and the INSPIRE project elevates survivor-informed research as a key part of knowledge production to help end slavery. Find out more: nottingham.ac.uk/rights-lab

About GoodWeave International

GoodWeave — a nonprofit organization founded in 1994 by Nobel Peace Prize laureate Kailash Satyarthi — is the leading international institution working to stop child labour in global supply chains through a market-based system and holistic approach. GoodWeave partners with companies and local producer communities to bring visibility to hidden supply chains; protect workers' rights; provide assurance that products are free of child, forced and bonded labour; and restore childhoods. Look for the GoodWeave® certification label on rug and home textile products. Learn more at goodweave.org

About Bangladesh Labour Foundation (BLF)

Bangladesh Labour Foundation (BLF), a nonprofit organisation established in 2001 to promote decent work and social justice across Bangladesh. BLF works through advocacy, research, and capacity-building to advance labour standards, eliminate child labour, and ensure gender equality. BLF collaborates with trade unions, civil society, and international partners to strengthen compliance with national laws and global frameworks. The Foundation also drives national initiatives on Just Transition, Human Rights and Environmental Due Diligence (HREDD), and Climate Justice to ensure no worker is left behind in the changing world of work. Learn more at www.blfbd.com

Authorship and acknowledgements

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Abbreviations

BDT	Bangladeshi Taka
BLA	Bangladesh Labour Act
BLF	Bangladesh Labour Foundation
EPZ	Export Processing Zone
FGD(s)	Focus Group Discussions
HBW	Home-based worker
ILO	International Labour Organisation
REC	Research Ethics Committee
RMG	Ready-made garments
UK	United Kingdom
USD	United States Dollars

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1. Executive summary

Bangladesh is one of the leading exporters of ready-made garments (RMG) in the world. Around four million Bangladeshis are employed in the RMG industry, the majority of whom are women and girls. Within this critical sector of the Bangladeshi economy and of global markets, exploitation of vulnerable workers remains pervasive. While international attention on the garment industry increased after the Rana Plaza tragedy in 2013, more than ten years later decent working conditions for the millions of people employed in this sector are far from having been secured. The primary aim of this study was to document the existence of forced labour and child labour within the RMG industry in Bangladesh, with additional focus on hidden and undocumented subcontracted worksites. Documenting the existence of home-based production in the sector was an additional objective.

1.1. Key findings

1. Child labour is present in RMG export supply chains in Bangladesh, especially via subcontracted factories. 100% of the minors interviewed were illegally employed as child labourers in RMG factories.
2. Thirty-two per cent of adult RMG workers surveyed are being paid below minimum wage, and 7% of respondents' income leaves them living below the international poverty line.
3. Almost a third of factory-based workers report working more than ten hours per day, six days per week, which exceeds the maximum limit for regular and overtime hours set by international and Bangladeshi law and is an indicator of forced labour.
4. While more women work in the RMG sector, they earn on average 2,000 BDT (18 USD) less per month than their male counterparts.
5. Due to lack of oversight from the government and private sector actors, risks of various kinds—from child labour to underpayments, safety concerns, and abuse—were more common in subcontracted factories linked to export than in those with direct links to international buyers.
6. Fifty-six per cent of factory workers surveyed have experienced threats or abuse at their current job—68% of adult workers and 90% of minors who reported abuse were female.
7. Home-based work is precarious, but workers surveyed feel safer from abuse when they work at home and appreciate flexible work hours.

1.2. Key thematic areas of concern

Child labour

With increased oversight and auditing of factories in the last decade, the presence of child labour in Bangladesh's RMG sector has decreased and is now often referred to as only affecting the informal sector or domestic market. However, this study found one minor (under 18 years old) for every fifteen adults identified as working in the RMG sector. One fifth of these children were working in factories exclusively producing for the export market, while the remaining 80% worked in factories that produced subcontracted or in some cases mixed-contract shipments. All of the minors interviewed were illegally employed on terms violating international or Bangladeshi laws, including 99% of them who worked more than five hours a day (the maximum allowed by law), thus qualifying as child labourers. Children in the RMG sector experience pressure to work long hours, exposure to hazards, disruption to schooling, low wages, and abusive treatment.

Wages and livelihoods

Decent wages are among the most important conditions and rights of work, and the main reason people work at all. However, 30% of all adult RMG workers in our sample were earning below the monthly minimum wage of 12,500 BDT (113 USD), implemented from December 2023. Almost all adult factory workers (90%) reported that their wages were insufficient to maintain a decent standard of living, and only 9% indicated they were able to save money. Low wages result in workers' inability to save and leave them with no choice but to accept work under any conditions just to survive. Such circumstances significantly increase their vulnerability to exploitation and forced labour.

Excessive overtime and production pressure

A range of factors converge to exert pressure on RMG workers to accept exploitative conditions and prevent them from being able to leave their employment. Enduring the mistreatment of managers, paired with a lack of alternative livelihoods, perpetuate abuses at all levels—from more 'minor' infringements of labour law to serious violations of human rights. Many workers reported exhausting working hours, excessive overtime, and underpayment or non-payment of overtime to which they were entitled. Many workers expressed the stress they feel about the hours they work and the pressure to meet their managers' unreasonable or impossible daily production targets in the factory.

Gender and abuse of vulnerabilities

The garment sector is known to be gendered work, with a large proportion of sewing machine operators in particular being women. In theory, this creates a positive opportunity for women to be in the workforce in terms of global development targets, empowered by having income and access to skill development. However, the sector's conditions put workers at risk of exploitation, which is particularly challenging for women, young workers, those with low education, and those who depend on the work for their livelihood due to poverty, leaving little option for work elsewhere. Discrimination, underpayment, abuse, and exploitative practices are systemic across the sector, and worse for workers employed by subcontracted factories. This study identified a significant gender pay gap of 2,000 BDT (18 USD) in Bangladesh's RMG sector, experiences of gender-based abuse, and the intersectional impact of poverty on individual experiences.

Subcontracting

RMG exporters rarely produce entire orders themselves and often subcontract work to other factories. In this study, 31% of adults and 80% of minors worked in factories performing subcontracted work. The study revealed that human rights risks—including child labour, underpayments, safety concerns, and abuse—were notably higher in subcontracted factories linked to exporters who in turn sell to international buyers than in the exporting factories themselves. These risks were higher in Chattogram compared to Dhaka, as the RMG sector in Chattogram is characterised by a lack of oversight from both governmental and non-governmental organisations (NGOs), which has led to a rise in subcontracted factories.

Abusive working conditions

The majority of RMG workers experience intimidation, threats, physical punishment, or sexual assault in the workplace. Fifty-six per cent of workers surveyed reported experiencing abuse at work, with the most common experience being verbal abuse. The ILO recognises verbal abuse as a form of psychological coercion and an indicator of forced labour.[1] While experiences of abuse are endemic, the ability of workers to address violations is limited because written agreements, worker representation, and effective grievance mechanisms are lacking, especially in subcontracted factories.

Home-based work

Home-based work in the apparel sector is informal, subcontracted work where production tasks such as sewing, cut pieces, embroidery, and finishing are carried out in private households or informal workshops rather than factory sites.[2] As workers are home-based, little is known about the conditions of work, safety, hours, and how children may be working alongside parents, posing concerns about labour exploitation. Our study shows that there are home-based workers in Bangladesh who supply garment factories for the export market. While home-based work entails risks associated with lack of oversight and worker protections, as well as the potential for invisible work performed by family members (particularly children), home-based workers in the study were generally positive about the flexibility associated with their work and being insulated from abuse by managers. However, home-based work remains largely off the radar for garment buyers, posing a risk of labour and human rights violations. Workers highlighted the need for increased wage rates for their work and raised concern about working conditions.

1.3. Recommendations

The recommendations provided in this report are designed to inform and advance efforts to protect RMG workers from forced labour and child labour. They speak to specific issues identified in our research, and at the same time take into consideration the current local context and the global regulatory landscape. Detailed recommendations are provided for four key audiences in line with the following six main principles:

1 Map supply chains to understand how lower tier worksites feed into RMG exports

- **Government:** Simplify worksite registration, mandate supplier disclosure, and maintain a transparent factory database. Strengthen oversight in high-risk hubs.
- **International Buyers**: Map supply chains beyond exporters, publish supplier lists, and set subcontracting guidelines. Train stakeholders and reform purchasing practices to reduce pressure on suppliers.
- **Suppliers**: Create, update and share supply chain disclosure documents.
- **NGOs and Trade Unions:** Gather and share data on smaller worksites' contributions and promote transparency through centralised databases.

2 Assess risk of forced labour and child labour in the RMG sector

- **Government**: Include Export Processing Zones (EPZs) under labour laws, enhance inspections, and increase inspector resources.
- **International Buyers**: Conduct risk assessments for subcontracted worksites and engage stakeholders, including workers and communities. Establish a local presence for monitoring.
- **Suppliers**: Implement risk-based sub-supplier monitoring and provide transparent data on risks.
- **NGOs and Trade Unions**: Share insights and data on risks with stakeholders to improve due diligence strategies.

3 Enforce payment of living wages and overtime compensation

- **Government**: Set minimum wages aligned with living standards, review wages frequently, and enforce laws through inspections. Facilitate collective bargaining and penalise violations.
- **International Buyers**: Support suppliers with systems for wage tracking, conduct audits, and collaborate on closing wage gaps through adjusted pricing.
- **Suppliers**: Ensure digital payroll systems, provide allowances, and guarantee timely payment. Promote gender equity and leadership development.
- **NGOs and Trade Unions**: Advocate for wage reviews, conduct worker awareness campaigns, and offer training on overtime and wage rights.

4 Cease, remediate, and prevent abusive and discriminatory working conditions

- **Government**: Enforce anti-discrimination laws, ratify ILO convention 190, and strengthen referral systems for victims. Train inspectors to identify violations.
- **International Buyers**: Embed abuse prevention in Codes of Conduct and focus on capacity building during inspections. Include climate impact guidelines for health and safety.
- **Suppliers**: Provide written contracts, establish zero-tolerance abuse policies, and improve workplace conditions. Implement gender-sensitive reporting and realistic production targets.
- **NGOs and Trade Unions**: Educate workers about rights, advocate for home-based worker inclusion, and provide legal aid services.

5 Cease, remediate, and prevent child labour

- **Government**: Enforce child labour laws, increase unannounced inspections, and align education age with legal work age. Support education initiatives for children.
- **International Buyers**: Strengthen child labour remediation protocols and conduct inspections of high-risk sites. Partner with NGOs to transition child workers to safe education or work.
- **Suppliers**: Implement rigorous age verification and partner with NGOs for child labour remediation programs.
- **NGOs and Trade Unions**: Offer prevention services, vocational training, and community-based support to reduce poverty-driven child labour.

6 Establish effective grievance mechanisms for workers

- **Government:** Develop robust systems for managing grievances and partner with NGOs to improve worker awareness of them. Learn from independent grievance mechanisms.
- **International Buyers**: Ensure anonymous, transparent reporting mechanisms are in place at the company and supplier-level. Track workers' satisfaction with closed grievances.
- **Suppliers:** Strengthen grievance mechanisms, allow independent trade unions, and ensure subcontractor accountability. Resolve complaints promptly and track outcomes.
- **NGOs and Trade Unions:** Raise awareness about grievance mechanisms and support training for their effective implementation.

1.4. Research methods

The study was conducted over the course of almost two years, from early 2023 to late 2024, adopting a mixed methods approach to understand the realities of people's experiences working in Bangladesh's RMG industry. A large-scale survey of 1,974 RMG workers—both adults and minors—was combined with ten in-depth focus group discussions and supported by literature, law and policy reviews to provide insights on the nature of RMG work and assess compliance with domestic and international standards. Data collection was conducted in the Dhaka and Chattogram divisions, as the areas of the country producing a high volume of ready-made garments for the global markets, including the United States and the European Union. Qualitative and quantitative analysis of surveys and focus groups sheds light on the abuses experienced by RMG workers and highlights critical areas in which reform is needed to ensure decent work and protect vulnerable populations from forced labour and child labour in this important sector.

2. Introduction

Bangladesh is one of the leading exporters of ready-made garments (RMG) in the world. The RMG industry plays a crucial role in the country's economy, acting as the main driver of foreign exchange earnings and employment opportunities, and contributing significantly to Bangladesh's socio-economic development.[3] In the 2022-2023 financial year,[a] the RMG sector accounted for 46.991 billion USD of Bangladesh's total export earnings of 55.558 billion USD (i.e. 85% of Bangladesh's total export earnings).[4] In terms of destination, an export statement during the same financial year showed the United States as the largest buyer of Bangladeshi garments, purchasing 9.701 billion USD worth of goods. Germany (with 7.079 billion USD) and the UK (with 5.310 billion USD) occupied the second and third positions, respectively.

Approximately four million Bangladeshis are directly employed in the RMG industry, ranging from skilled to semi-skilled and unskilled labourers across a range of products and roles.[5] The cheap cost of labour attracts global apparel brands and retailers looking to reduce production costs. Despite its importance, the RMG sector's reliance on informal workers and the prevalence of forced labour remains under-documented. Various reports from international organisations[6],[7] offer initial evidence, but lack comprehensive coverage of the prevalence of child labour or forced labour in global RMG supply chains. Research indicates that forced and child labour most often occurs in lower tiers of the supply chains, including undocumented subcontracting worksites.[8] Research reports also call for more investigations into subcontracting and how it may be linked to global exports.[9]

Through this research, we want to establish a comprehensive evidence base on the risks, presence, and root causes of forced labour and child labour in Bangladesh's RMG sector. In this study, we focus on examining the presence of forced labour, as well as child labour (including the worst forms of child labour). To identify the risks of forced labour, we use the Indicators of Forced Labour produced by the International Labour Organisation (ILO)[10], which are relevant for identifying risks in product supply chains.

The aim of this research was to close the evidence gap on forced labour and child labour by engaging with workers to learn about their experiences in both factory and home-based work, and to inform interventions to advance human rights in the RMG sector by businesses, government agencies, and NGOs. With the support of Bangladesh Labour Foundation (BLF) and Awaj Foundation,[b] we also explored the critical experience of women, minors, and workers facing financial difficulties. Finally, we are able to present a more comprehensive picture of the current state of the sector in Dhaka and Chattogram, considering the post-Covid context, with a new minimum wage law implemented, and ten years since the Rana Plaza factory collapse and all the subsequent multi-stakeholder actions taken to prevent a similar recurrence from a health and safety perspective. With our recommendations, we call for a new wave of collective action with workers to support a better future for Bangladesh's RMG sector.

[a] In Bangladesh, the financial year for the central bank runs from July 1st to June 30th of the following year.

[b] These two organisations work directly with workers in Bangladesh, consult survivors, and gather insights from affected communities to ensure they reach and document the most vulnerable garment workers.

2.1. The RMG sector in Bangladesh

Bangladesh is identified as one of the most vulnerable countries to forced labour in the Asia-Pacific region.[11] The vulnerability of people in the country is influenced by several factors, including economic conditions, discrimination against minorities, displacement due to natural disasters and rural migration, political instability, and the lack of effective monitoring and enforcement of labour laws.[12] Despite being a leading global provider of affordable clothing, Bangladesh's RMG sector continues to face criticism regarding labour standards, child labour, workplace safety, and more.[13] International scrutiny has increased in recent years following fatal accidents in worksites and more stringent ethical sourcing global standards. Yet, labour rights concerns remain endemic in Bangladesh's RMG industry.

Several recent events have driven greater industry attention to workers' rights and well-being in Bangladesh's RMG sector.

Rana Plaza tragedy

2023 marked the ten-year anniversary of the Rana Plaza accident, in which the Rana Plaza commercial complex in Dhaka collapsed, killing over 1,100 garment workers and injuring another 2,500.[14] The accident brought to light the lack of oversight of big international brands and prompted the introduction of two international initiatives—the Accord on Fire and Building Safety in Bangladesh and the Alliance for Bangladesh Worker Safety (extended in 2018 and expanded to become the International Accord and Nirapon, respectively). Since May 2019, the RMG Sustainability Council has taken up the work of the Accord in Bangladesh conducting factory inspections.[15]

Covid-19 pandemic

While there had been remarkable progress on health and safety and other worker rights issues through routine inspections in Bangladesh, other issues have persisted or worsened. Most notably, the Covid-19 pandemic fostered irresponsible purchasing practices by global buyers, thereby increasing pressures on suppliers and their workers. Cancellations of orders accounted for significant rates of job loss and layoffs, often without severance.[16]

Worker protests for minimum wage increases

The Government of Bangladesh reviews and adjusts minimum wages every five years, informed by recommendations from a Minimum Wage Board that includes garment industry executives and labour union representatives. The 2023 increase moved the minimum wage from 8,000 to 12,500 BDT (73 to 114 USD) per month, far less than the 23,000 BDT (210 USD) demanded by workers to meet growing prices due to inflation. This gap sparked public demonstrations and worker protests, which were met with police force and suppression, including arrests and beatings.[17][18] After the transition to a new government in late 2024, a wage review committee approved an annual incremental increase of 9% to take effect in early 2025.

Recent political upheaval

2024 saw a historic power shift in Bangladesh's government, as the Prime Minister since 2009 was forced to resign amidst student protests over government job quotas and youth unemployment, and the government's suppressive response. This shift to an interim government, which is still in place as of late 2024, creates uncertainty throughout the industry. Future policy and enforcement will depend heavily on the priorities and alliances of the country's leadership, which is yet to be chosen.[19]

New regulations

Over the past decade, new human rights due diligence laws—including the European Union's Corporate Sustainability Due Diligence Directive (CSDDD), similar due diligence initiatives in France, Germany, and Canada, and forced-labour import bans, such as the United States Tariff Act and the UK Modern Slavery Act—have compelled brands to focus on preventing and remediating human rights issues in their supply chains. Brands are increasingly investing in sustainable and ethical sourcing amidst this regulatory shift, as importing countries prioritise environmental and human rights driven consumerism.

Climate impacts

According to a recent report by the Bangladesh Institute of Labour Studies, one-fourth of internal migration in Bangladesh is related to a climate change symptom like crop failure, flood, cyclone, drought, and increase in pest infestation. For nearly one-tenth, an environmental reason, particularly river-bank erosion is a main cause for migration. Further, working conditions inside of RMG factories are exacerbated by increasing temperatures, as well as unreliable electricity and cooling systems.[20]

3. Key terms and definitions

Minors

In this report, authors define *a minor* as any worker below the age of 18 years. For the purpose of this report, this term is used interchangeably with *child*. We are aware that, under Bangladesh's labour law, there is a distinct age group classified as *adolescents*, referring to individuals aged between 14 and 17. However, in our report, we use the general terms *child* or *minor*, and *adolescents*, as defined by the UN Convention on the Rights of the Child.

Child labour

Any work or economic activity that is harmful to the health or development of a child; or would prejudice their attendance at school, their participation in vocational or training programs approved by the competent authority, or their capacity to benefit from the instruction received. This includes the sale and trafficking of children and all forms of slavery or practices similar to slavery of children.

Forced labour

Defined by the ILO Convention 29 as all work or service exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

Modern slavery

Used as an umbrella term to include forced labour, human trafficking, debt bondage and the worst forms of child labour (among other practices). It involves exploitation of individuals by others for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.

Factory types

There are a number of factory types captured in this study, which we divide under three terms based on contract type. This refers to their relationship with international supply chains (the focus of this study) and not the domestic market. In this report we refer to factory types as:

- **Export-oriented:** factories that undertake only direct contracted work with international brands
- **Subcontracted:** factories that do no direct contracted work, instead receiving orders from other factories
- **Mixed-contract:** factories that may undertake both kinds of orders

A diagram in section 7.5 (Figure 19) further illustrates these relationships and types.

Home-based work

Home-based work in the apparel sector is informal, subcontracted work wherein tasks are carried out in private homes or surrounding areas rather than in factory sites. They are typically contracted by a manager of the factory or a 'middleman' to take bundles of work as tasks to work on at home (usually small pieces), contributing to goods for RMG value chains. This is usually ad-hoc and seasonal, paid for by piece instead of salaried. More information on this type of worker can be found in section 7.7.

Ready-made garments

Ready-made garments are clothing manufactured and assembled in standard sizes, ready for consumer wear without need for customisation, as sold by many mainstream and high street retailers globally. RMG factories contribute to the assembly of the final garment in part or whole, and do not include other earlier processes in the supply chain such as dyeing or fabric production. The majority of workers who participated in the study are sewing machine operators involved in the final assembly, or helpers to that role.

Wage standards

The law in relation to minimum wage is included in the overview in section 7.2. The concept of minimum and living wage is as follows:

- **Minimum wage**: This refers to the lowest legal amount employers are allowed to pay workers in a given area. This can fall short of actual cost of living and can therefore be less than enough to meet workers' basic needs such as housing, utilities, and food.
- **Living wage**: The ILO included a call for "the provision of an adequate living wage" in its founding constitution, later referring to this concept as "the payment to the employed of a wage adequate to maintain a reasonable standard of life as this is understood in their time and country".[21] It is commonly understood that it should provide enough to pay for food, water, housing, education, health care, transportation, clothing and some discretionary earnings, including savings for unexpected events.[22]

4. Discussion of relevant law

The following section outlines the key laws and conventions relevant to various forms of labour exploitation identified in this research and applicable in Bangladesh.

4.1. Bangladeshi jurisdiction

The primary labour law in Bangladesh is the *Bangladesh Labour Act (BLA) of 2006,* which was amended in 2013 and 2018. This Act establishes standards for labour rights during the recruitment process and throughout the labour-employer relationship. It covers minimum wages, wage payments, health and safety, occupational hazards, youth employment, maternity benefits, working hours, trade unions rights, and general working conditions. While the BLA does not explicitly define forced labour, it does establish penalties for certain labour offences that could be linked to forced labour. For instance, section 289 imposes penalties for paying wages below the minimum rate.

In 2009 the Bangladesh High Court issued a verdict directing the relevant authorities to establish Complaint Committees in all workplaces to address sexual harassment.[23] The Court also instructed government to treat the guidelines as law until parliament enacts appropriate legislation based on them. In 2022, Bangladesh amended the Bangladesh Labour Rules of 2015, incorporating Rule 361. This amendment incorporated the definition of sexual harassment, the formation of Complaint Committees, and an outline of their responsibilities.[24]

4.2. Forced labour under Bangladeshi law

Under the *Constitution of Bangladesh*, forced labour is explicitly prohibited. Article 34 states, "All forms of forced labour are prohibited, and any contravention of this provision shall be an offence punishable in accordance with law."[25] However, it does not provide a definition of forced labour. Article 14 of the Constitution outlines the State's duty to liberate citizens from all forms of exploitation.

The Penal Code 1860[26] also prohibits unlawful compulsory labour, stating: "Whoever unlawfully compels any person to labour against the will of that person, shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both." However, this provision also lacks a detailed definition of forced labour or the exploitation it entails.

4.3. Child labour under Bangladeshi law and national policies

The BLA defines a *child* as a person who has not completed their 14th year of age, while an *adolescent* is a person who has completed their 14th year but not their 18th. Chapter III of the Act explicitly forbids child labour across all occupations and establishments.[27] If any questions arise as to whether any person is a child or an adolescent, this is to be resolved through reference to the person's birth registration certificate, school certificate, or a certificate issued by a registered medical practitioner.

The BLA strictly prohibits the employment of children or adolescents in hazardous activities, such as operating dangerous machinery, working underwater or underground, or engaging in tasks classified as hazardous by the government.[28] Additionally, the BLA prohibits employing adolescents to clean, lubricate, or adjust machinery in any establishment while it is in motion, as well as to work in positions where they are situated between moving parts or between fixed and moving parts of such machinery.[29] In 2013, the Bangladeshi government issued a list of hazardous tasks, such as dyeing or bleaching of textiles and weaving, to prevent children's involvement in such work.[30] This list was updated in 2022 to include five additional hazardous occupations, including informal or local tailoring and garment sector work.

4.4. Education

Article 17 of the Constitution calls for effective measures to ensure all children receive free and compulsory education. The *Primary Education (Compulsory) Act of 1990* mandates free, compulsory education for children aged six to ten (through class five). The Act prohibits engaging children in work that would prevent them from attending primary school.

4.5. Working hours and overtime rate

4.5.1. Adults

The general rule under the BLA on working hours and overtime rates[31] states that no adult worker shall be required or permitted to work more than eight hours in a single day.[32] If a worker exceeds this limit on any given day or week, they are entitled to an overtime allowance at double their normal rate of basic wage, along with dearness allowance and ad-hoc or interim payments.[33] Further, no adult worker should be required or permitted to work more than forty-eight hours per week.[34] In cases of overtime, the total working hours of an adult worker must not exceed sixty hours in any week, with an average limit of fifty-six hours per week over the course of a year. There are certain exceptions for specific types of services, however these are not applicable to the garment sector.

4.5.2. Minors

The BLA states that no adolescent shall be required or permitted to work in any establishment more than five hours in a single day and thirty hours in any week. In cases of overtime, the total number of hours worked including overtime shall not exceed thirty-six hours in any week.[35] Further, no adolescent shall be required or allowed to work in any establishment between the hours of 7pm and 7am (i.e., overnight).[36]

4.5.3. Annual and sick leave

The BLA stipulates that an adult employed in a factory is entitled to one day of holiday per week. Additionally, every worker is entitled to 10 days of casual leave with full wages in a calendar year. Regarding annual leave, any adult worker who has completed one year of continuous service in an establishment is entitled to leave with wages. The number of leave days is calculated at the rate of one day for every eighteen days of work during the preceding twelve months (for factory workers).

Employees are entitled to full wages for up to 14 days of sick leave in a calendar year. However, this leave is only granted if a registered medical practitioner—either appointed by the employer or another certified practitioner—examines the worker and confirms that the individual is ill and requires time off for treatment or recovery for a specified period.

Table 1. Working hours requirements by The Bangladesh Labour Act, 2006

Workers	Age	Working hours per day	Working hours per week	Maximum total hours per week including overtime	Night shifts
Adults	18+	8	48	60	Women have the right to opt out of work between 10pm and 6am
Adolescents	14-17	5	30	36	Prohibited to work between 7pm and 7am
Children	Under 14	Children under 14 are not allowed to be employed[37]			

4.6. International standards for labour

The government of Bangladesh has ratified eight of the ten fundamental ILO conventions, including Conventions C029 (Forced Labour); C105 (Abolition of Forced Labour); C138 (Minimum Age) and C182 (Worst Forms of Child Labour) as well as Protocol P029 (Protocol 2014 to the Forced Labour Convention 1930).

The ILO Forced Labour Convention (No.29), defines forced labour as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily. This definition includes three key elements:[38]

1. **Work or service:** Applies to all forms of work in any sector, including informal work environments.
2. **Menace of Penalty:** Covers a broad spectrum of penalties that are used to force someone to perform work.
3. **Involuntariness:** Refers to a lack of free and informed consent from the worker, meaning they were coerced or deceived into taking the job and are not free to leave. An example would be when false promises are made by employers or recruiters to make someone accept a job they would not have otherwise taken.

4.6.1. Child labour under international law

According to the ILO, child labour is defined as work that deprives children (any person under 18 years of age) of their childhood, potential, dignity, or harms their physical or mental development.[39] This includes work that is dangerous to children mentally or morally, or that disrupts their education by preventing them from attending school or requiring them to juggle schooling with long and difficult working hours.[40] The classification of work as "child labour" depends on several factors, including the child's age, the type and number of hours worked, the conditions under which the work is performed, and the specific laws within individual countries.[41]

Hazardous child labour (as one of the worst forms of child labour) is defined in Article 3(d) of the ILO Worst Forms of Child Labour Convention (No.182) as "work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children". It involves work performed under dangerous or unhealthy conditions that could lead to a child being killed, injured, or made ill due to inadequate safety measures and poor working environments.[42] It can result in permanent disability, health issues, and psychological harm.

The ILO Minimum Age Convention (No.138) establishes minimum age thresholds for various forms of employment within the framework of child protection. It sets minimum ages at 15 years for general employment; at 18 for hazardous work, and at 13 for light work if it does not harm a child's health or interfere with their education.

When ratifying ILO Convention No 138, countries can opt for a higher minimum age for employment, such as 16, or in the case of developing nations, they may set the minimum age one year lower than the standard, allowing for regular work at 14 years of age and for light work at 12 years of age.

4.7. Human rights due diligence

International standards such as the 2011 UN Guiding Principles on Business and Human Rights[43] and the OECD Guidelines for Responsible Business Conduct[44] set best practice standards on responsible business conduct. In parallel, supply chain transparency and due diligence laws, especially with a focus on modern slavery and broader human rights, have been developing since 2015, when the UK became the first country to adopt a modern slavery law with specific requirements for businesses. Since then, similar regulations have expanded and now cover businesses in countries representing over half of global GDP with requirements to assess, address, and disclose labour and human rights risks within their supply chains. There are three particular types of laws that are affecting businesses (particularly in Canada, Europe, USA and UK):

1. **Reporting and disclosure requirements**: Early examples of measures to combat modern slavery (including forced labour and child labour) in supply chains, and voluntary disclosure of related response activities and policies through annual statements. Examples include the UK (2015) and Australian (2018) Modern Slavery Acts, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023).
2. **Due diligence laws**: Mandatory regulations that require reporting, mandate more detailed steps to assess, identify, mitigate, remediate, and monitor human rights risks more broadly, and include penalties for violations. Examples include the European Corporate Sustainability Due Diligence Directive (2024), the German Supply Chain Act (2021), and the French Duty of Vigilance Law (2017).
3. **Customs laws**: Laws that prohibit trade (particularly import) in goods produced wholly or partially by forced labour. If identified, goods may be held at the port of entry while an investigation occurs and, where necessary, remediation takes place. Examples include the US Tariff Act (1930), under which 'Withold Release Orders' are issued where concerns of forced labour have been highlighted, as well as the newly passed European Forced Labour Regulation (2024).

Many brands in the fashion sector are beginning to manage their human rights risk strategy in line with these frameworks, even if they do not meet the threshold of minimum requirements for reporting. Brands have also adopted voluntary standards and joined multi-stakeholder initiatives to inspire and collaborate on human rights action.

5. Research methods

The primary aim of this study was to document the existence of forced labour and child labour practices within the RMG industry in Bangladesh, with additional focus on hidden and undocumented subcontracted units. Documenting the existence of home-based production in the sector was an additional objective.

5.1. Phases of research

The research was organised into four key stages: (1) research design and ethical review; (2) piloting and refinement; (3) data collection; (4) analysis and synthesis. The study used a mixed methodology combining qualitative and quantitative methods, with the research team collecting primary and secondary data. Qualitative and quantitative data were collected through surveys with garment-workers and 10 focus group discussions with workers.

5.1.1. Designing the instruments and conducting the ethical review

Before the research began, the research team developed survey questionnaires, prepared protocols for conducting fieldwork, and provided training to the enumerator team on the ethical requirements of the study. The survey questionnaires were developed together with Bangladeshi labour rights experts and grassroots organisations. Further details on instruments and trainings are provided in section 5.2. According to the ethical policies of the University of Nottingham, all research involving human subjects and/or their data must first be reviewed by the Research Ethics Committee (REC) to ensure compliance with university guidelines and good practice. Prior to commencing field research, all research instruments were submitted to the University of Nottingham School of Law REC for review and approval. Research began after receiving approval from the ethics committee.

5.1.2. Pilot stage

Prior to full fieldwork implementation, the enumerator team conducted a pilot phase with approximately 100 surveys in three potential areas from 16 October to 4 November 2023. This stage was essential for testing the questionnaires and interview process, allowing the team to identify and make any necessary changes. The Rights Lab team visited Dhaka at the end of the pilot period to meet with the BLF team and work on adjusting the questionnaires. Two groups of researchers spent two full working days, including fieldwork, to ensure questionnaires aligned with the research focus and that interview protocols were adhered to. As a result, additional questions were added based on BLF's recommendations and their observations on how to improve question comprehension among respondents.

5.1.3. Surveys and focus groups

The main fieldwork phase took place from 1 December 2023 to 8 July 2024. A team of six enumerators, led by a team lead, collected data through this period. Interviews were primarily conducted in the evenings and all day on Fridays, the rest day in Bangladesh, in order to reach workers when they were not working in factories. Fieldwork was paused during national and festival holidays, when many RMG workers returned to their home regions, making them less accessible for interviews. Additionally, data collection was halted for approximately two weeks in December 2023 due to worker protests in Dhaka.[45] Across 101 field working days, the enumerator team conducted 1,974 surveys with adult and minor RMG workers.

Focus group discussions commenced in late April, once a substantial amount of survey data had been analysed to inform focus group questions on specific topics that emerged. Throughout the research process, the Rights Lab's research lead maintained weekly contact with field researchers.

5.2. The researchers

In addition to the Rights Lab researchers, there were six enumerators (four male and two female), and a team lead from BLF. All BLF researchers were fluent in Bangla and had extensive experience in conducting similar research and knowledge of labour rights and garment industry in Bangladesh. Together with enumerators, eleven volunteers (five female and six male) participated in the field work. The volunteers assisted by providing guidance on identifying areas where different types of factories relevant to the research focus were located, facilitating access to workers' communities, and translating into the local language (in Chattogram) when needed. Since surveys were often conducted in the evening and late at night, having local volunteers familiar with the area helped the enumerator team feel secure in the field. All researchers and volunteers received training on ethical requirements of conducting research. This training focused on obtaining consent prior to starting interviews, maintaining participant anonymity, sampling techniques, and handling interviews with minors, among other topics. The team were also provided with a detailed protocol outlining all the requirements. In addition, an in-person instructional session was provided in Dhaka before the beginning of fieldwork where Rights Lab researchers advised on interview techniques and safeguarding considerations.

5.3. Survey approach

5.3.1. Development and description of research surveys

The Rights Lab team, in collaboration with GoodWeave and BLF, prepared English-language drafts for two survey instruments[c]: (1) a questionnaire for adults employed in the RMG sector; (2) a questionnaire for minors working in the RMG sector.

The BLF team translated these instruments into Bangla, incorporating minor adjustments and modifications to improve accessibility.

Questionnaire for adults employed in the RMG sector

The survey instrument for adults working in the RMG sector was divided into seven sections:

1. Consent form
2. Household and demographic information and household roster
3. Nature of work
4. Recruitment/human trafficking
5. Nature of employment and threats
6. Debt bondage
7. Final remarks

Each section included targeted questions on the presence of risk of forced labour and/or exploitation among respondents. The final survey item provided an open-ended text field, enabling enumerators to capture additional qualitative insights, including their observations and participants' personal experience related to work in the RMG sector and general daily life.

Questionnaire for minors working in the RMG sector

The survey instrument for minors working in the RMG sector was constituted of seven sections:

1. Consent form
2. Household and demographic information; household roster[d]
3. Nature of work
4. Nature of employment and threats
5. Schooling
6. Recruitment/human trafficking
7. Final remarks

This survey was created to assess the presence of child labour either via underage work (under 14) or illegal conditions of employment for young workers (age 14-17). Children employed in industries outside the RMG sector were not included in the survey. For ethical compliance, enumerators were trained to obtain consent from a responsible guardian before involving minors in interviews. Additionally, minors themselves were required to give assent to participate. Enumerators did not proceed with interviewing minors if no guardian was present at the time.

[c] Survey instruments are available upon request to GoodWeave International.

[d] A household roster is a list of all people living together in one household. It captures basic information about each person, like age, sex, relationship to the head of household, education, and occupation. It helped researchers better understand the household structure and dynamic.

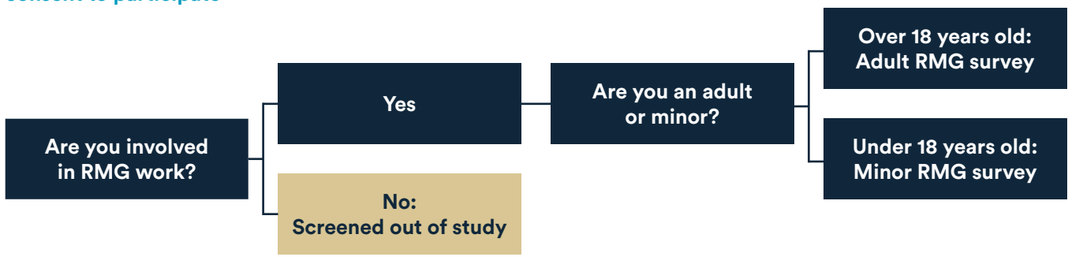
5.3.2. Inclusion and exclusion criteria

Data collection sought to engage two core participant cohorts: (1) minors engaged in RMG work; and (2) adults engaged in RMG work. Inclusion criteria required:

For minors, that they: (1) were under 18 years of age (self-reported);[e] (2) were working in the RMG industry producing for export (determined by enumerator observation, volunteer knowledge, or self-reported); and (3) had given informed assent alongside consent from a responsible guardian/parent. Failure to meet any one of these criteria resulted in exclusion from the study.

For adults in RMG occupations, that they: (1) were 18 years or older (self-reported); (2) were currently working in the RMG industry producing for export (observed or self-reported); and (3) had given informed consent to participate in the research. Failure to meet any one of these criteria resulted in exclusion from the study.

Figure 1. Screening and selection process for survey participants who have given informed consent to participate



5.3.3. Site selection and sampling

To meet the study objectives, ensuring coverage of areas in which RMG workers are employed in export-oriented and subcontracted factories (or mixed-contract) producing RMG for export, purposive sampling[f] was deployed to select research locations.

Bangladesh is divided into eight administrative divisions, from which the Dhaka and Chattogram Divisions were first selected because the majority of RMG work for export in the country takes place in these two locations.[46] These divisions are further divided into districts (thirteen in Dhaka Division and eleven in Chattogram), which are in turn divided into sub-districts (*upazilas*). Within the Dhaka and Chattogram Divisions, purposive sampling of districts and sub-districts was conducted in collaboration with BLF based on their extensive expertise in the local context and preliminary evidence review. Areas were selected based on: (1) presence of both export-oriented and subcontracted factories producing RMG for export; (2) high population of RMG workers residing in the areas; and (3) consultations with research partners on known risks of labour abuses among the population.

BLF conducted field visits to potential research sites to confirm the presence of RMG factories, across contract types including mixed. The main goal for the research team was to identify locations near worksites that conduct high-risk processing that is typically subcontracted (e.g., sewing, embroidery, cutting), as well as locations where home-based work was occurring. These in part or as whole contribute to the assembly of the final garment, and do not include other processes in the supply chain such as dyeing or fabric production.

Following the finalisation of the research sites, enumerators commenced data collection in accessible locations within the relevant areas. Enumerators visited households in the finalised list of chosen locations (see Table 2), beginning with the first house accessible from the point of entry into the area and moving sequentially. If a selected household did not have at least one RMG worker, it was not surveyed and enumerators moved at least two houses down from the non-RMG household to increase the distance covered and ensure areas in which higher concentrations of RMG workers resided were reached. Enumerators also drew on their expert knowledge of the context to identify areas more densely populated with RMG workers, involving local volunteers who have collaborated with BLF on numerous research projects.

[e] Some sensitive questions would not have been asked to minors under the age of 10.

[f] Purposive sampling is a non-random sampling method where researchers intentionally select participants who meet specific criteria or characteristics relevant to the study's objectives, representing the target population.

To identify households where home-based garment work was occurring, snowball sampling was used. This method began by identifying one home-based worker, after which the enumerator team asked this worker where other home-based workers lived in the community. Following the recommendation of the first home-based worker, the team visited the specified addresses, and if other home-based workers were found, they were asked the same question so the team could continue identifying home-based workers to conduct surveys. At the end of each conducted survey, workers were given a small food package (fruit juice and crackers) as a form of compensation for their participation. The packages were given at the very end, so participants did not know about them until the survey was completed.

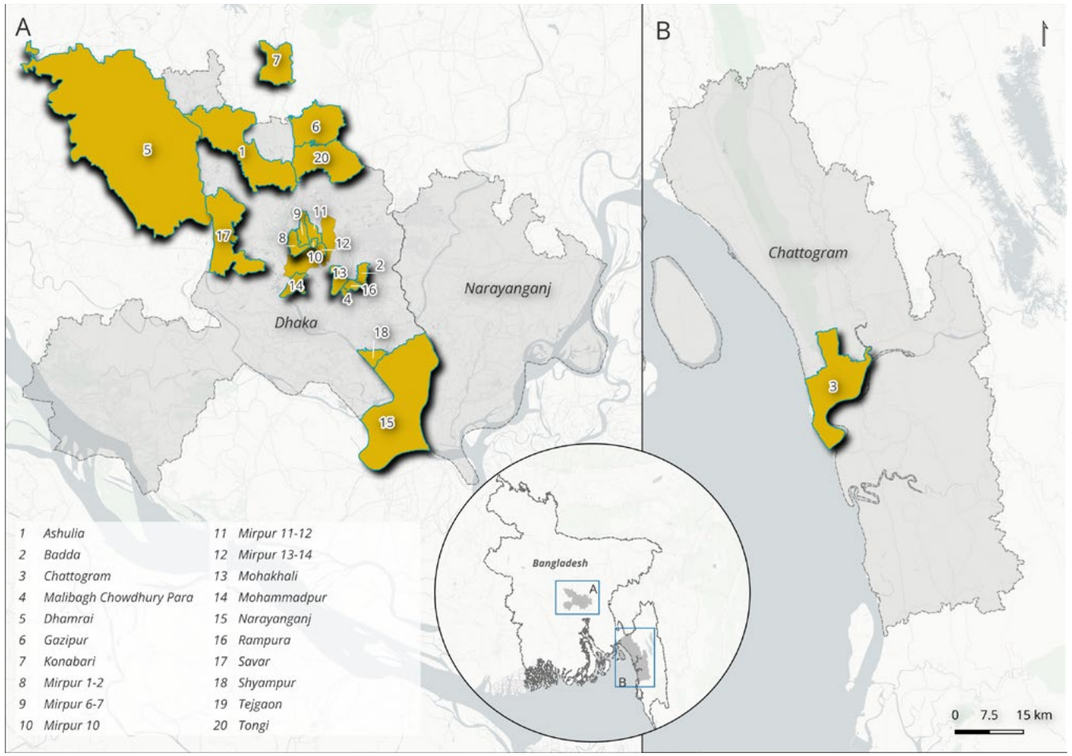
Table 2 provides an overview of research locations and the number of surveys collected in each.

Table 2. Survey locations and number of surveys conducted

Research locations	Number of surveys
Ashulia	188
Badda	23
Chattogram	303
Malibagh Chowdhury Para	10
Dhamrai	12
Gazipur	233
Konabari	67
Mirpur-1,2	31
Mirpur-6,7	65
Mirpur-10	54
Mirpur-11,12	42
Mirpur-13,14	112
Mohakhali	42
Mohammadpur	119
Narayanganj	241
Rampura	16
Savar	277
Shyampur	16
Tejgaon	35
Tongi	100

The following map displays the locations of these surveys:

Map 1. Survey locations



5.4. Focus groups

In addition to the surveys, the research team conducted ten in-person focus groups with 88 RMG workers, including minors: seven in Greater Dhaka and three in Chattogram. To recruit participants, the research team conducted a preliminary analysis of 1,305 survey responses that had been collected over the course of the first five months. Based on this, and with BLF's advice, a list of locations in which both child labour and subcontracted factories were identified was compiled (see Table 3).

As a next step, the team of enumerators visited these locations and invited RMG workers (both factory workers and home-based workers, in separate groups) by visiting randomly selected households. This was again a purposive selection, as the goal was to include only RMG workers in the focus groups and no other types of workers. It is not possible to determine whether some focus group participants had also been surveyed previously, as no identifying information was collected in line with ethics requirements.

The questions for the focus groups covered working conditions, the nature of work, overtime hours and wages. Detailed information on the focus groups is set out in Table 3.

Table 3. Focus groups locations and participants

No.	Location of FGD	Residence areas of participants	Place of work	Gender	Age group	Number of participants
1	Dhaka	Munshipara, Ashulia	Home	Female	Adult	9
2	Dhaka	Borobari, Gazipur	Home	Female	Adult	9
3	Dhaka	Tongi	Factory	Male	Adult	7
4	Dhaka	Mirpur 6, 7, Mirpur 12	Factory	Female	Minor	10
5	Dhaka	Mirpur 14	Factory	Female	Adult	10
6	Dhaka	Muslimpara, Narayanganj	Factory	Female	Minor	6
7	Dhaka	Mohammadpur	Factory	Female	Adult	10
8	Chattogram	Fakirhaat, Nimtola, CDA, Boropole, Dompara, Nimtola	Factory	Male	Adult	10
9	Chattogram	CDA, Nimtola, Boropole	Factory	Female	Adult	9
10	Chattogram	CDA, Nimtola, Chotopool	Factory	Female	Minor	8

5.5. Challenges and limitations

Key challenges included the identification of locations in which both export-oriented and subcontracted RMG factories presented obstacles to the study. These included securing a gender-balanced enumerator team, and safety challenges and conditions. Each of these challenges is addressed in turn in the sections below.

5.5.1. Identification of locations of export-oriented and subcontracted RMG factories

The research team compiled a list of locations and subdistricts (see section 5.3.3) with presence of both export-oriented and subcontracted RMG factories, as well as areas where child labourers and home-based workers were identified or suspected to exist. This list was primarily informed by a literature review and extensive preliminary investigation conducted by the BLF team, in consultation with Awaj Foundation. Before the study commenced, the BLF team made several visits to various areas to gather insights from locals about the presence of subcontracted factories and minors working in RMG. However, since the list was not comprehensive and did not encompass every establishment, it is likely that many locations were unintentionally excluded from the sample. While this purposive location sampling was designed to yield insights of high relevance for the study, findings are not fully representative of RMG production locations within Dhaka and Chattogram.

5.5.2. Gender-balanced enumerator team

As mentioned earlier, most surveys were conducted in the evenings and on Fridays. The enumerator team was based in Dhaka city, which experiences heavy traffic, especially in the evening. Commuting to and from survey locations, combined with the time taken for each survey (approximately one hour per participant) often resulted in the team returning home around midnight. This raised a safety concern for female enumerators being out late in locations that were unfamiliar to them. This also presented a significant challenge for recruiting female enumerators to maintain a gender balance within the team. However, among volunteers were five females who assisted the team with gaining access to locations and households, ensuring the gender balance of the team was maintained. To minimise the potential risks, the team conducted regular briefings on safety protocols prior to each fieldwork session. Additionally, they were provided with a private vehicle for transport, ensuring that they did not depend on public transport during the fieldwork phase.

To collect surveys during the phase of field work in Chattogram, BLF needed to recruit and train a separate female enumerator, as none of the female members of the Dhaka team was available to travel to Chattogram for two weeks. Additionally, the new enumerator was fluent in the local language and assisted the team with translations when needed.

Garment worker at sewing machine in the factory

5.5.3. Safety challenges and conditions of work

In January 2024 the team visited Gazipura Sataish, specifically an area known as Kamrul er Bosti' (Kamrul's Slum) also known as Cox's Bazar Slum. Using snowball sampling, they had learned from another home-based worker that there were potential interviewees in the area. Upon arrival, they were approached by two men who aggressively demanded to know why they were in the area. Following the research guidelines, the team supervisor explained why they were visiting the area and provided identification documents. The men discouraged the team from conducting interviews but initially allowed them entry. However, shortly after the enumerators entered the area, the two men returned and insisted that the team leave. The supervisor informed BLF's management about the incident, who told the enumerators to prioritise safety and leave the area.

After leaving and moving to another area, the enumerators noticed they were being followed. The men did not interrupt their work, and the enumerators chose not to engage with them. Throughout the day, senior management maintained constant communication with the team to ensure their safety and provide support.

> *"The scary part is that those people followed us the entire day. They went to every place we went." – Enumerator.*

For safety reasons, the team opted not to return to the site. Therefore, Kamrul er Bosti' was not covered in the research.

Considering the long hours worked late into the night, the significant time spent commuting, and the difficult task of hearing the often-traumatic experiences faced by RMG workers, the professionalism and dedication of the enumerator team and volunteers and their commitment to the research process should be emphasised. They were crucial contributors to this study.

5.6. Analysis

Survey data was collected using SurveyCTO software, and was exported, processed, and analysed in Microsoft Excel, using a combination of descriptive and inferential statistics. Qualitative analysis of open-ended survey questions and focus group discussions was conducted in NVivo 14 qualitative analysis software, supplemented by manual coding in Excel. Quantitative and qualitative analysis were conducted simultaneously in an iterative process, which sought to identify key insights from quantitative data, explore potential explanatory factors and in-depth insights on findings in qualitative responses, and in turn examine patterns and trends identified through qualitative analysis in the quantitative data.

6. Respondent demographics

6.1. Survey participants

Surveys were conducted in both Dhaka and Chattogram. A total of 1,974 respondents completed the survey. Among them, 85% (n=1,671) were based in Dhaka and 15% (n=303) were based in Chattogram (see Figure 2). This is largely due to the time spent conducting data collection in the different locations: the team spent a total of 84 days collecting survey responses in the Greater Dhaka area and 17 days in Chattogram, due to resource limitations and the capacity of the enumerator team. Across locations, 94% (n=1,852) of respondents were adults, and 6% (n=122) were minors (see Figure 3).

Figure 2. Proportion of respondents engaged in RMG work by location

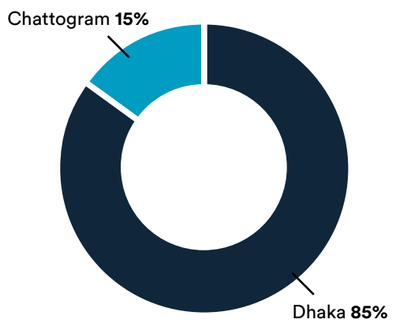
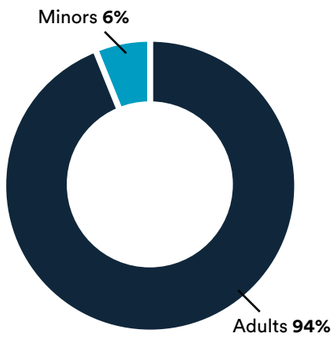
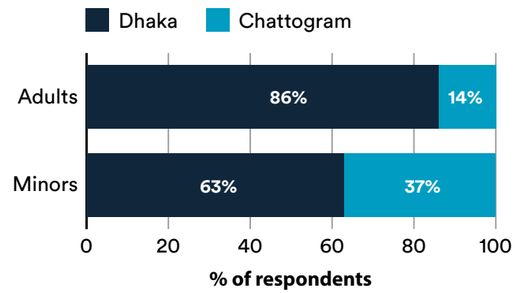


Figure 3. Proportion of respondents engaged in RMG work by age group



Among adult participants, 86% of respondents (n=1,594) were based in the Greater Dhaka area, while 14% (n=258) were based in Chattogram (see Figure 4). A larger proportion of minor respondents were from Chattogram, representing 37% of minor respondents (n=45). However, the majority of minors were still based in the Greater Dhaka area (n=77, 63%). This may suggest a higher proportion of minors in RMG work in Chattogram than in Dhaka, potentially attributable to less extensive oversight of the sector in Chattogram. This link could be better explored with more research.

Figure 4. Location of respondents by age



The majority of survey respondents were female, representing 67% (n=1,242) of all adult respondents and 83% (n=101) of all minor respondents (see Figure 5 and Figure 6). This reflects the gendered nature of work in the RMG sector in Bangladesh, where females make up the majority of the labour force.[47]

Among adult respondents, participants ranged from 18 to 64 years of age, with the majority falling in the 25-39 age range (see Figure 5). The distribution of males and females across age groups was relatively similar, with 31% of males and 37% of females in the 18-24 age bracket, 58% of males and 56% of females in the 25-39 bracket, and 11% of males and 7% of females in the 40-64 bracket.

Minor participants ranged from 10 to 17 years of age (see Figure 6). The minimum age for work in Bangladesh is 14 years, and the majority of minor respondents (91%) were aged 14 or older. However, 7% (9 respondents) were aged 13 years, one respondent (a female) was 12 years old, and the youngest respondent (a male) was only 10 years old.

Figure 5. Adult survey participants by sex and age

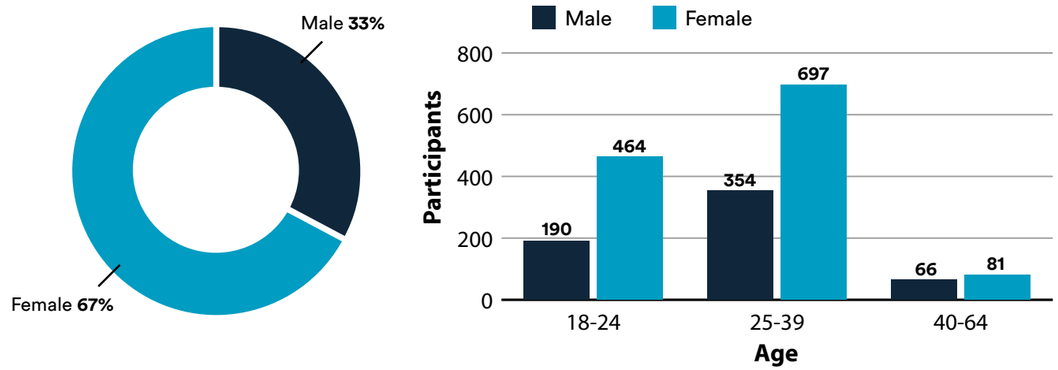
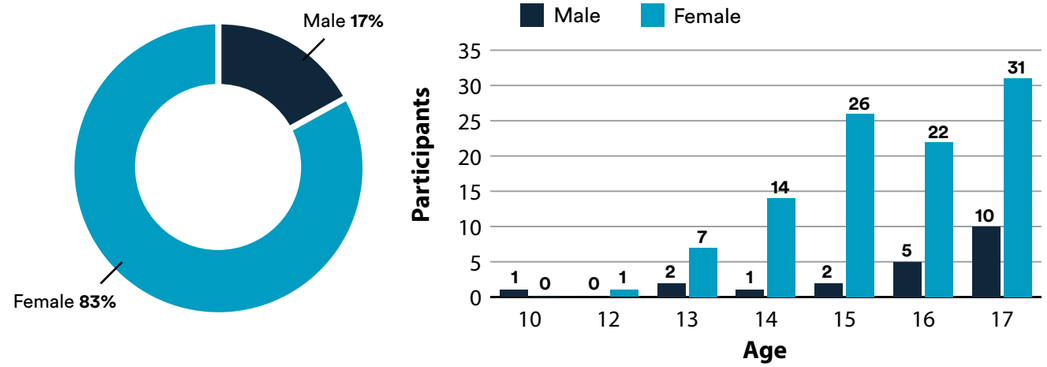


Figure 6. Minor survey participants by sex and age



It is important to emphasise the significance of uncovering the extent of subcontracted and home-based employment within the RMG industry for export, given the limited documentation of such. The vast majority of respondents worked in factories, with 96% of adults (n=1,777) and 99% of children (n=121) working in factory units. However, 4% of adults (n=75) were performing home-based work, supplying bigger exporting factories.

Among adult respondents, 65% of them (n=1214) were working at export-oriented factories, 7% (n=121) at subcontracted facilities, and 24% (n=432) at mixed-contract facilities. For minors, nearly half of the respondents (47%, n=57) were working at mixed-contract factories, 33% (n=40) at subcontracted factories, and 20% (n=24) at export-oriented factories (See Figure 21).

6.2. Focus group participants

Three of the focus groups were male only, and the other seven female only. Adult workers were between 18-48 years old, with between one month and 26 years of employment in the RMG sector. Among factory workers, the roles varied between machine operators, helpers, quality checkers, and auxiliary roles such as cleaning and maintenance.

Two focus groups comprised of home-based workers, both in Greater Dhaka, were all female. Three focus groups included minors working in factories. Two of these took place in Greater Dhaka, one with boys and one with girls, and another group with adolescent girls took place in Chattogram. Minors' ages spanned from 12 to 17 years old, with between five months to two years of experience in the RMG sector. In addition, one minor joined a home-based worker group.

Female walking past workshop fronts in Greater Dhaka

7. Discussion of results

7.1. Child labour

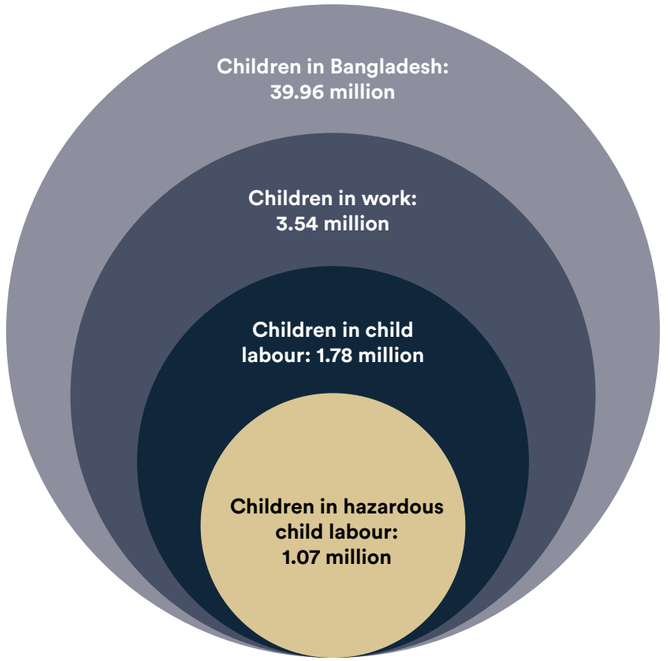
Child labour is present in RMG export supply chains in Bangladesh, especially via subcontracted factories. 100% of the minors interviewed were illegally employed as child labourers in RMG factories.

Child labour remains a significant issue in Bangladesh[48], despite government regulations and NGO and brand-led initiatives. The problem is particularly prevalent at the subcontractor and informal levels, where oversight from international buyers is limited.[49]

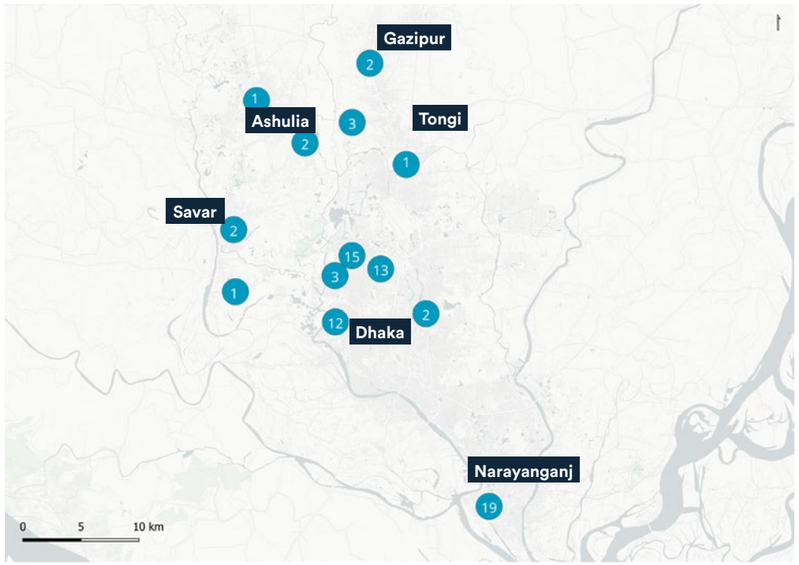
According to the provisional report from the latest National Child Labour Survey conducted by the Bangladesh Bureau of Statistics, 1.78 million children were in child labour across various sectors, 1.07 million of whom were engaged in hazardous child labour.[50] This from a total of 3.54 million children engaged in work (see Figure 7). While not all of these children were employed in the garment sector, over one-fifth were working in industrial sectors,[51] which includes RMG production.

Child workers employed legally and child labourers, can be found both in export-oriented and subcontracted garment factories, not just in informal and domestic-oriented producers. They are usually hired either directly by employers or through family members.[52] These minors often perform the same tasks as adults, though some may work in assistive roles. Research indicates that minors frequently work excessive hours, surpassing the limits set by legal standards.[53]

Figure 7. Child labour statistics in Bangladesh (total)

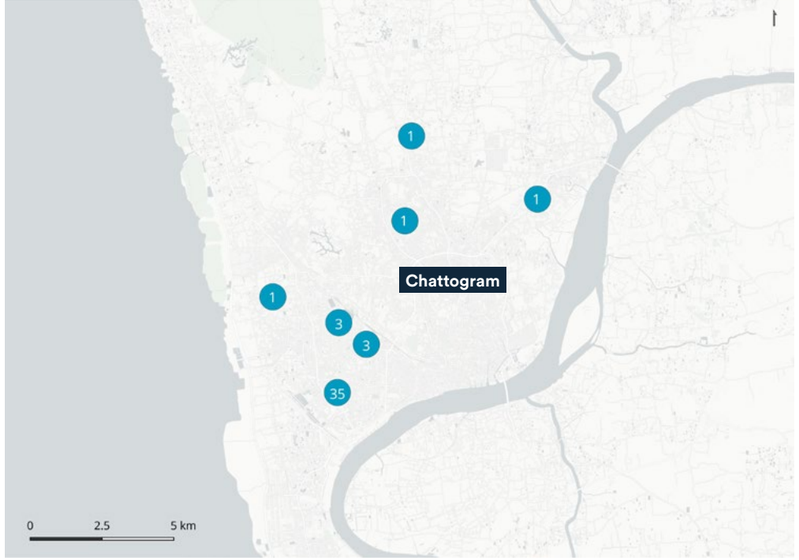


Map 2. Child labour locations in Dhaka and surrounding areas



Through our survey, we spoke to a total of 122 minors (aged 10-17) who worked in the RMG sector, with 20% working in factories exclusively producing for the export market. The remaining 80% of minors worked in subcontracted factories or mixed-contract factories. They were found in both Dhaka (see Map 2) and Chattogram (see Map 3) regions:

Map 3. Child labour locations in Chattogram



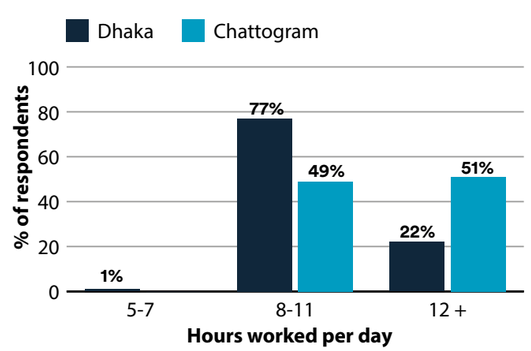
Due to the limitations under Bangladeshi law for young workers (refer to Section 4.5), 100% of minors who participated in this study are child labourers, with many experiencing exploitative practices, hazardous conditions and other factors which identify them as such. This section demonstrates the disparities and issues affecting minors employed in the RMG sector, in terms of work pressure and hazards, disruption to schooling, low wages and violent treatment.

7.1.1. Excessive and illegal working hours

The Bangladesh Labour Act (2006) states that: "No adolescent is allowed to work in factory for more than 5 hours a day and 30 hours a week. They are also not allowed to work between 7pm and 7am". With voluntary overtime, this should not exceed 36 hours for workers aged 14-17. **However, 100% (n=122) of minors interviewed were subject to one or both of these violations, making them illegally employed as child labourers**.

In Dhaka, 99% of minors surveyed reported working eight or more hours per day, with only one participant who reported working within the legal 5-hour limit (Figure 8). Among minors in Chattogram, all worked longer than the 5-hour limit, including 51% who worked hours in excess of the legal limit for adults, exceeding 60 hours work per week (refer to Section 4.5). Eighty-nine percent of minors (n=108) reported they work after 7pm, and 9% (n=11) mentioned working before 7am, both of which are not allowed for minors under Bangladeshi law as referenced above. Most minors are working 6 days per week and are hence vastly overworking the 30-hour weekly limit, with more than half of minors doubling it or more.

Figure 8. Working hours per day – minors



The FGD with minors in Chattogram revealed that all participants worked **thirteen to fifteen hours per day**. Minors in a FGD from Greater Dhaka reported working nine to 14 hours per day, with a monthly income ranging from 5,000-11,500 BDT (45 to 104 USD). A 14-year-old participant from Chattogram reported being forced to stay past 8pm to assist others in the factory after completing her shift. She was threatened with deductions from her overtime pay if she did not comply.

7.1.2. Minors' wages

The findings show that minor respondents were earning less than adults, despite working the same or even longer hours (see further adult wages in section 7.2). The majority of minors surveyed who were employed in a factory (61%, n=73) earned between 6,000 BDT (54 USD) and 9,999 BDT (90 USD) per month. In Chattogram, six minors reported earning as little as 2,500-4,000 BDT (23-36 USD) per month.

Only 12% (n=15) of minors reported earning more than 12,500 BDT (115 USD) per month, the legal minimum wage for adults (see further adult wages in section 7.2). There is no specific wage requirement for children, so while many perform the same work as adults and work adult hours, children are not included within minimum wage laws and remain in a loophole without ability to argue for the same wages.

For minors who worked in subcontracted factories in Chattogram, none of them earned more than 9,999 BDT (90 USD) per month. In Dhaka, only one of the minors working in subcontracted factories reported earning 12,500 BDT (113 USD) or more per month, whereas those in export-oriented factories in Dhaka met this income threshold.

"My salary is 4,000 taka, and from this salary, 3,500 taka goes towards rent for my family" – 17-year-old female FGD participant

"If we protest for a salary increase, they will fire us. So we are afraid to speak up." – 15-year-old female FGD participant

"Due to family financial problems, I came to work. My two sisters are disabled, and my family depends on me. If I work, the family runs; if I don't, it doesn't." – 17-year-old male FGD participant.

7.1.3. Hazardous work

The Bangladesh Labour Act (2006) states: "No adolescent shall be allowed to clean, lubricate or adjust any machinery of any establishment while it is in motion or to work between moving parts or between the fixed and moving parts of such machinery." More specifically, in 2013 the Bangladesh government identified 38 processes/activities hazardous for children, including dyeing and bleaching of textiles. Moreover, the Bangladesh Factories Rules (1979) lists lifting, stacking, storing, and shipping (…) as hazardous operations.

> *"If fire breaks out, we are in danger. There is no fire alarm, fire exit or anything inside the factory." – 15-year-old female FGD Participant.*

Among all minor participants in Greater Dhaka, 27% (n=21) reported their work included cleaning, lubricating or adjusting moving machine parts, which are considered hazardous roles for minors. Regarding tasks that involve working between moving machine parts, 31% of minors from Chattogram (n=14) were involved in such work, compared to 27% of minors in Dhaka (n=21). Additionally, a small number of minors in Greater Dhaka were involved in lifting equipment or appliances (3%, n=2), with the same number involved in dyeing or bleaching.

7.1.4. Physical and verbal abuse

Mistreatment and abuse of minors in some factories was revealed in both the survey and focus group responses. Some survey anecdotes included reports of being physically assaulted, with managers throwing things at them for failing to complete their work in time. All minors from the three FGDs mentioned being scolded and verbally abused. One group also referred to being hit or pushed:

> *"Sometimes they touched me on the back and slapped me on the head." – 14-year-old female FGD participant.*
>
> *"One day, I was working. The manager pushed me" – 14-year-old female FGD participant.*

Participants in other FGDs said that strict rules were placed on not being hit or physically touched and this helped them feel safe. The experiences of abuse are further explored through section 7.6 and explored in the child worker's case study found on page 32.

7.1.5. Falsification of documents for work

Both FGD and qualitative survey data reveal that it is common practice for minors to work with fake identity documents.

> *She started her career as a minor. She began working in the export-oriented RMG sector using fake identity documents that altered her name and increased her age. – enumerator notes during survey with a 19-year-old female RMG worker.*
>
> *She started her first job as a minor (17 years old) using a fake birth certificate because she needed a job. - enumerator's notes during survey with a 19-year-old female RMG worker.*

Participants in one FGD with minors reported that they all work in small factories where compliance is not maintained. As factory management intentionally seeks cheap labour, they do not verify the worker's age. **Notably, one participant in this FGD was a 12-year-old girl, who had already been working as a helper for one year.**

> *"I went to the gate of the garment factory myself and spoke to an officer there who gave me the job." – 17-year-old female FGD participant, who began work one year prior.*

7.1.6. Schooling

All of the 24 FGD participants and most minor survey participants (98%, n=120) were not attending school at the time that they participated in the survey, with the remainder attending less than one full day a week. The main two reasons reported for not attending school were financial need within the family requiring them to work full-time (69%, n=84) and the inability to afford school fees (57%, n=70). More than half (52%) reported they would like to return to school if possible.

All minor participants in FGDs expressed regret about leaving school, but felt they had little choice.

All FGD participants had left school to join the workforce, with family financial needs being the primary motivation. This included the need to contribute to debt repayment, rent, food and medical bills. **All minor participants in FGDs expressed regret about leaving school, but felt they had little choice.** FGD participants who worked in factories shared that once they were in work, there was no time for schooling. One of the home-based workers, a 14-year-old girl, reported being able to balance her home-based work with her studies, allowing her to both earn and attend school, as well as receive additional tutoring.

Among minor survey participants, 4% (n=5) had never attended school. The majority of children (73%) attended school for five or more years, and 23% attended for less than five years (five years being the duration of compulsory primary education in Bangladesh).

All minor participants believed that if they had continued their education, they could have secured better jobs, gained knowledge, and possibly achieved higher social status or prestigious positions.

> *"I could have gotten a good job. I could have become a high-ranking officer if I had an education." - 17-year-old male RMG worker.*
>
> *"If I had the chance to study again, I would grab the chance."- 16-year-old male FGD participant.*
>
> *"She still wants to study if there is any arrangement for studying on Friday. Her dream is to grow up to be a doctor." - enumerator's notes during survey with a 14-year-old female RMG worker.*
>
> *"The girl also has strong will for education, but seeing her family's poor condition, she is continuing her job. Even weekend free school is not feasible as she has a long working hours and no weekly holiday." - enumerator's notes during survey with a 13-year-old female RMG worker.*

Case study: A child worker's experience

The following case study illustrates a young factory worker's story taken from their own words, as described through a FGD. The name has been changed.

Fatima's story

I'm 14 years old and live in Chattogram. I have been working for a garment factory as a helper for one year now. I was born in a village far away, but my parents moved here to find work when I was young as we were facing hardship and family issues, so this is the only home I know.

I don't go to school anymore because we had money problems at home and my parents couldn't afford the expenses anymore. I regret leaving school, but I feel I don't have a choice; I had to find work to help the family with debt repayments and money for food. The other option for work at my age and with my minimal education is domestic work. We can't even do many tasks. They hire us at low wages, teach us the tasks and so I just have to focus only on those tasks. I feel that school life is better for me.

I work at a small factory, and I know I am cheap labour for them and that is why I was hired. Management didn't verify my age or give me a contract of any kind; they just needed the help. I found the job through my sister, but I know friends here who just came to the gate one day and the officer hired them.

The work is very exhausting and there is high pressure to complete our work. I have to work continuously when I am here and cannot take a rest break. Even when it is hot and the fans do not work properly, we have to keep working in the intense heat. And I think we are not treated the same as adults. We have to do more.

When our work ends, we try to leave at 8pm. At this time the supervisor tells us to help the operators with their work, but If I do not agree with the supervisor, they tell me they will cut my overtime. Then I am obligated to work. And if we ask for leave when we are ill, they tell us to act as if we are fine. 'Finish the work first, then go.' On those days they force us to stay late again so they don't mean it.

I usually start work at 7am and end at 10pm, so my days are long. I am upset about the hours and do not have personal time for myself or my family. For this I earn about 3,000 BDT (*27 USD) a month. Of course, I am not happy about that amount either. If we want a salary increase, we have to protest but we can't really address this with anyone. My friend says they will fire us if we try to protest so we are afraid to speak up. And sometimes they delay the payments too and promise the amount next month.

Me and my friends are all shouted at and verbally abused inside the factory, so we don't feel safe. They say bad things about our parents and for the women they shout inappropriate things too, it is definitely worse for us girls. Sometimes my manager hit me on the back and slapped me on the head when I did something they did not like, and they pushed my friend too.

If the work hours were reduced a little, we could stay at home and do other work for additional income. That way our family life would be better.

7.2. Wages and livelihoods

Thirty-two per cent of adult RMG workers surveyed are being paid below minimum wage.

Wages are among the most important conditions and rights of work,[54] and the main reason people work at all. The basic principles of a stable income are that workers receive their wages in full, on time, and that it is enough to provide for a "decent living" for them and their families.[55] This standard of living includes access to food, water, sanitation, housing, clothing, and additional expenses such as commuting costs.[56]

According to estimates from the True Cost documentary,[57] only 2% of the 75 million garment workers globally are able to meet their most basic needs. In Bangladesh as of 2024, the minimum wage covers only 62% of the living wage, leaving a 38% gap.[58] The Global Living Wage Coalition published a benchmark study providing estimates of family living income expenses and living wages for Dhaka and its surrounding satellite cities, where most of Bangladesh's garment industry is located. The 2024 update found that the living wage required is 194 USD per month 23,100 BDT (197 USD) for the satellite cities and districts surrounding Dhaka,[59] and 27,900 BDT (238 USD) for Dhaka City itself.[60]

Despite trade unions in the garment sector calling for a minimum wage of 23,000 BDT (210 USD) during demonstrations in November 2023, the Bangladesh Minimum Wage Board set the updated minimum monthly wage for the garment sector much lower, at only 12,500 BDT (113 USD).[61] Prior to this adjustment, the minimum wage had been fixed at 8,000 BDT (74 USD) since 2018, despite growing inflation. This can differ for those in EPZs, those who are paid by piece like home-based workers, and other nuances.

> *"We eat less to save money. If my salary was 20-25 thousand BDT, I could provide enough food to my family." - 23-year-old male RMG worker.*

However, our findings showed that:

- **32% of all adult workers surveyed in Bangladesh's RMG sector were earning below the minimum wage.**
- The majority of adult factory workers (70%) surveyed reported that their earnings were insufficient to maintain a decent standard of living.
- Only 8% of respondents indicated they were able to save money.

Low wages result in workers' inability to save and leave them with no choice but to accept work under any conditions, just to be able to survive. Such circumstances significantly increase their vulnerability to exploitation and forced labour.

To explore participants' experiences of wages and livelihoods relating to their employment, we asked about the payment methods and amounts of income, as well as barriers such as withheld or delayed wages and the impact on their life, health, stability and debts.

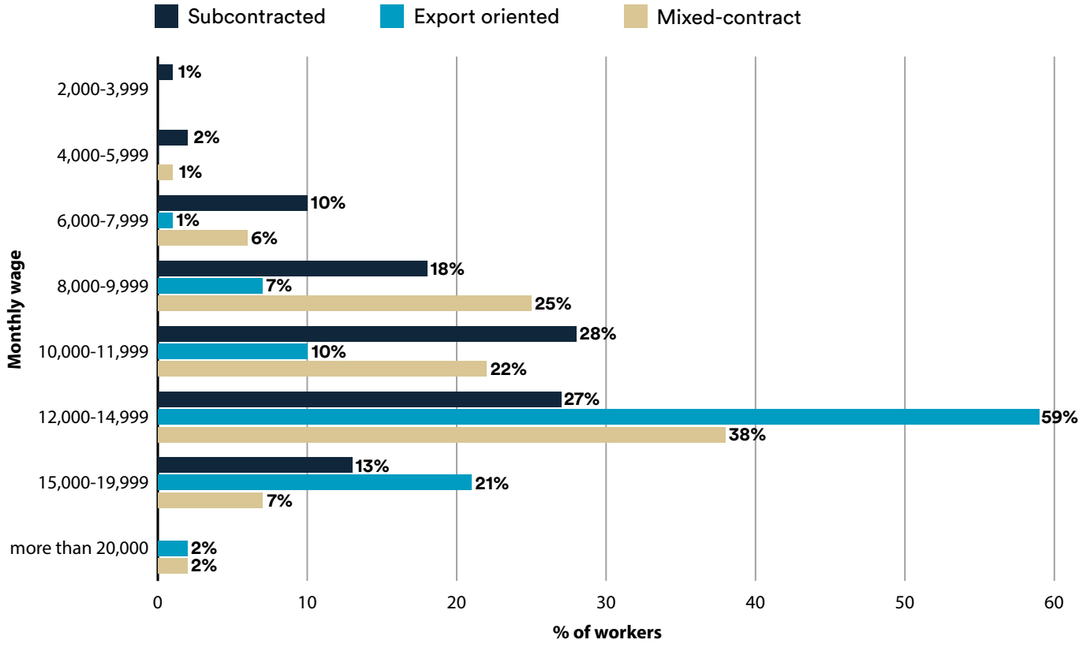
> *"I cannot keep a balance between my earnings and my expenditure. I cannot save any money for my future. This salary is not doing any good to me and I am barely surviving." – Focus Group discussion, 21-year-old female RMG worker.*

7.2.1. Factory workers' wages

The vast majority of factory workers surveyed (98%) reported being paid monthly, but the amounts received ranged from 4,000 BDT (36 USD) to over 20,000 BDT (180 USD) (see Figure 9).

Workers employed in export-oriented factories were more likely to earn the minimum wage or more (82%), whereas the majority of respondents in subcontracted factories (59%) and those working for mixed-contract factories (53%) earned less than 12,000 BDT (108 USD).

Figure 9. Factory workers monthly wage, by factory type



Thirty-two per cent of all adult factory workers surveyed (n=533) reported not earning the minimum monthly wage, 12,500 BDT (113 USD), indicating factories were failing to meet this standard. However, when reporting their wages, respondents included overtime pay (total income from factories), indicating that many more workers would fall into the category of those not earning the minimum wage based on their regular salary alone.

In addition, 7% (n=137) of respondents live below or close to the international poverty line of 2.15 USD per day[62] despite being employed full time by factories. This threshold equates to an average of 7,237 BDT (65 USD) per month.

The majority of factory workers surveyed (83%) reported not having a bank account, which also applied to 99% of home-based workers. Instead, workers receive wages in cash or via digital accounts (i.e., mobile money), less formal options with lower transparency. Workers interviewed reported several instances of wage withholding and delay, which are indicators of forced labour.

According to the data collected, the majority of workers in subcontracted factories (72%, n=87) were paid in cash. This method has low transparency and increases the risks of labour rights violations. Only 3% of this group (n=15) reported bank transfers as their payment method. Export-oriented factories were less likely to pay wages in cash, instead using the option to pay via mobile money or bank transfers. Additionally, export-oriented factories were more likely to enable higher income for workers than subcontracted factories. The data also show a correlation between cash payments and lower wages: workers paid in cash were more likely to receive lower wages than those paid through digital or bank methods where there is more possibility for tracing payments.

Female RMG workers tagging finished garments in a factory

7.2.2. Withholding of wages and payment delays

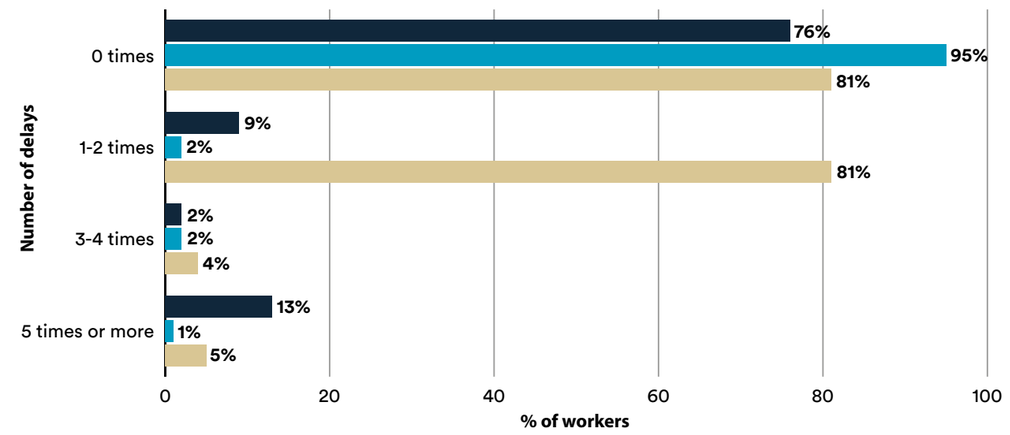
Workers in subcontracted factories reported experiencing more payment delays compared to workers in factories supplying international buyers directly.

Respondents reported both delayed payments and wage withholding, which worsen their financial situation. Withholding of wages is an indicator of forced labour,[63] relevant to both the threat of penalty and the lack of voluntary consent. The consequences of delayed wages on RMG workers can be severe, as many workers are not able to accumulate savings while working in the sector.

Minors were more likely to report wage payment delays, with 44% of minor respondents indicating delays within the past year. Nearly a quarter of these minors (23%) reported experiencing delays on five or more occasions over the past year.

Repeated delays were more commonly reported in factories that either exclusively or partially deliver subcontracted orders. Thirteen percent of adult workers who worked in subcontracted factories reported experiencing more than five delays in the past year, compared to only 1% of workers employed by factories that export directly to global buyers. (see Figure 10). Those repeated delays were more commonly reported in Chattogram than Dhaka, with particularly large differences for minors. In Chattogram, 38% of minors reported five or more delays, compared to 14% of minors in Dhaka. For adults, 8% in Chattogram had experienced five or more delays, compared to only 2% in Dhaka. Subcontracted factories are more prevalent in Chattogram, which logically accounts for the higher number of payment delays reported in this region.

Figure 10. Number of payment delays in the previous year experienced by adult workers



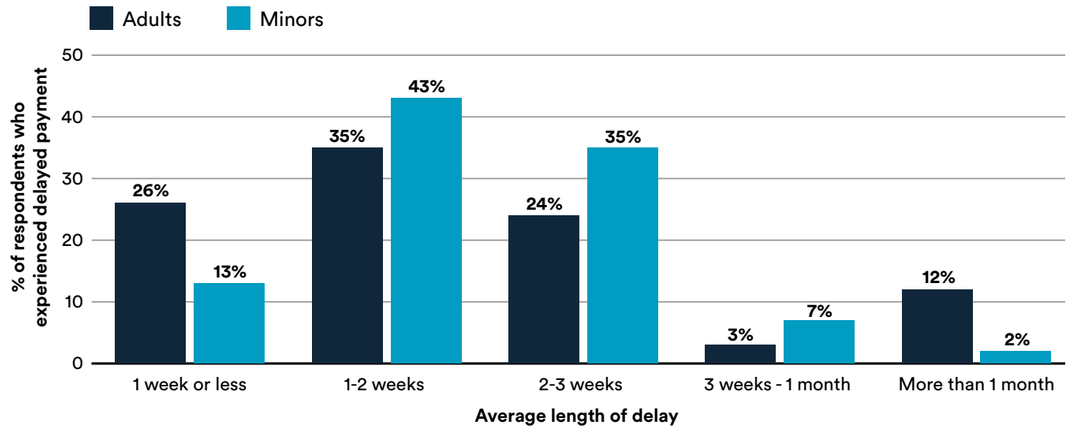
Minors were more likely to experience delays in payments for their work than adults. Almost a quarter of minors reported that their payments were delayed five times or more within the past year.

"If we are absent once in a month, they count two/three days absent. We get the salary on 10th day of every month while we were supposed to get that on 1st day. Even we do not get the whole salary at a time. Our salary is withheld for three months now. They also cut overtime payment if the operator cannot fill up the target. They cut overtime payment if we enter the factory a little late." - 23-year-old male RMG worker.

From participants who reported delays, a delay period of one to two weeks was most common for both adults and minors, representing 35% and 43% of respondents reporting delays respectively (see Figure 11). Twelve percent of adults reported delays averaging over one month.

A small number of respondents reported payments being reduced (seven adults, 10 minors) or withheld (eight adults, two minors) when they did not finish work assigned to them. Reductions in pay were particularly notable among minor respondents, experienced by 8% of participants.

Figure 11. Average length of delays experienced by respondents



It has been established that payments are already low, and costs of living and high inflation put pressure on workers' families. Participants were asked to share how they pay for necessary expenses while waiting for wage payments. They mostly rearrange personal budgets, accrue debt, and take out loans.

A few FGD respondents reported that managers say delayed wage payments are a result of delayed shipments. This suggests that purchasing practices and payment terms directly affect workers' wages when factories operate with tight margins. Managers attributing delayed wage payments to buyers may also be used to avoid taking responsibility within the factory which would be an indicator of withheld wages. However, these observations should be understood as reflective of what workers were told rather than necessarily reflecting the reality of interactions between buyers and factory managers. In addition, managers who have withheld wage increases, or who have increased production targets, responsibilities or unpaid overtime alongside the increase of wages, are withholding wages and exploiting workers.

> *"We write overtime in the account book. Then we show them that we are working so many hours. But the management give us less money instead of the due money." – 21-year-old female FGD participant.*

7.2.3. Affording essential goods

Food is an essential part of decent living, and the minimum wage must allow workers to afford sufficient food to meet their nutritional needs. However, 78% of adult survey respondents (n=1,449) and 84% of minors (n=102) reported not being able to purchase enough food for their family to eat. Further questioning of this theme during FGDs revealed more detail. Participants in all FGDs felt that they struggled to feed themselves properly and sufficiently. Workers often relied on basic meals like rice and lentils and reported eating meat or fish for protein only once or twice per month.

Ninety-two per cent of workers expressed that they would not have enough money to survive if they left their current job.

> *I cannot afford to eat good food after paying my house rent. I only eat to fill my stomach. – 20-year-old female RMG worker.*
>
> *"I work in a garment factory to meet basic food requirements." – 16-year-old male FGD participant.*


Shared kitchen adjoining RMG workers' homes in Chattogram area

Only 1% of all adult respondents reported receiving financial assistance from the government, and only 1.5% of respondents reported having other sources of income. Alternative employment opportunities are scarce for RMG workers, putting additional pressure on them to retain their jobs and making them more vulnerable to exploitation.

As well as increased production pressure and reduced overtime pay, anecdotal comments from participants suggested that rent and the price of other goods also increased around the time of salary increases, meaning it covered little more than inflated costs.

> *There is no money left after salary increase. Because the house rent has increased the price of goods is high. It was much better before the salary increase. – 25-year-old male RMG worker.*

7.2.4. Debt

Thirteen percent of survey respondents (n=240, or one in eight) reported being in debt. This is due to the generally poor financial condition of RMG workers as stated above. The majority of these reported owing money to microcredit institutions. Only a small number of workers who owe debts (2%, n=5) reported borrowing money from their employer. Overall, the research did not find sufficient evidence to conclude that garment workers are at high risk of debt bondage to their employers.

> *"The salary is not enough for me. Sometimes I need to take loan to cover my family expenditure." – 32-year-old male FGD participant.*

To understand the general expenses and debt values in more detail, FGD participants were invited to share a breakdown of their monthly household income, expenses (including food, rent, schooling, medical fees, utilities, clothes and other general supplies) and debts owed. For FGD participants who were adult factory workers (n=46), 70% were able to cover regular expenses through their monthly income (n=32), leaving 30% falling short, risking becoming indebted. However, 52% specifically owed debts (n=24, or 1 in 6.5) ranging from 300 BDT to 100,000 BDT (2.70 USD to 900 USD). Of these, 29% (n=7) had debts which valued more than one month's total household income. For those who owed debts, some are already not able to cover basic expenses, making repayment of such debts impossible. The family owing the largest debt of more than five times its monthly income has a monthly deficit of 1,800 BDT.

> *"My son cannot walk as he has defect in his leg. We cannot go for the surgery as we do not have any savings. It would be better if there were low-cost medical facilities for people like us." – 23-year-old female FGD participant.*

7.3. Excessive overtime and production pressure

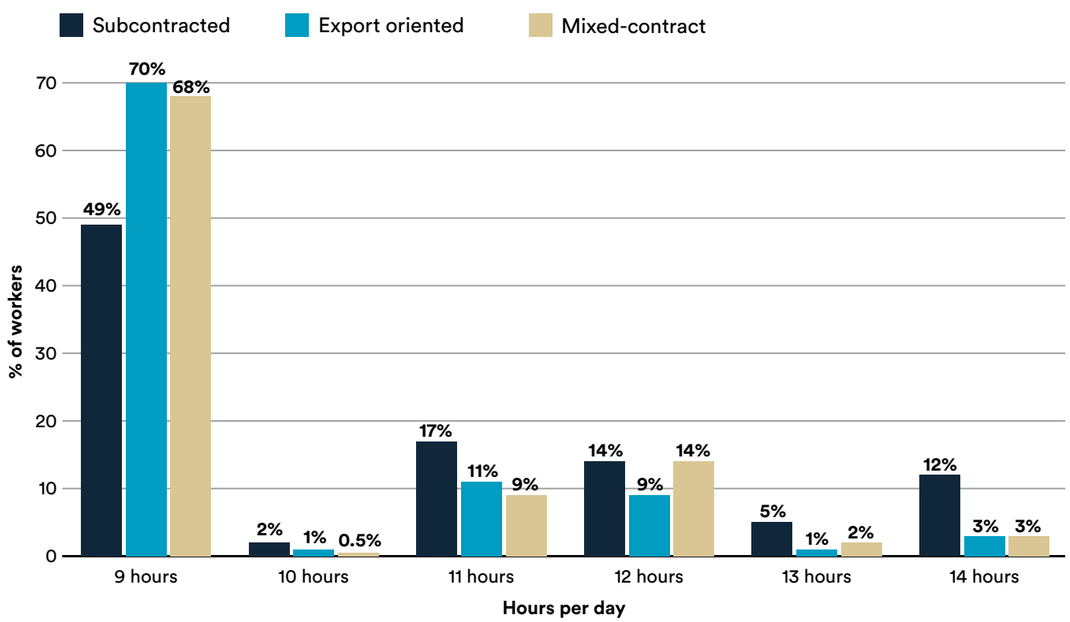
Almost a third of factory-based workers report working more than ten hours per day, six days per week, which exceeds the maximum limit for regular and overtime hours set by international and Bangladeshi law, an indicator of forced labour.

Working long hours, often with excessive overtime, is a prevalent issue for RMG workers in Bangladesh.[64] The ILO's baseline study on working conditions in the RMG sector shows that workers faced significant workloads, often working between eleven and fifteen hours daily.[65] Notably, the same study reveals 97.3% of factories required employees to work overtime.[66] Almost half of the workers surveyed expressed support for overtime, as it provided them with additional income. The ILO suggests this indicates the existing wage scale might be insufficient for workers to sustain their living expenses. It is crucial to note that according to the ILO's Indicators of Forced Labour, working more overtime than allowed by national law in order to cover minimum living expenses is an indicator of forced labour.[67]

Many workers in this research expressed the stress they feel about the hours they work and the pressure to meet targets in the factory. Excessive overtime and reliance on this overtime for financial needs are indications of exploitation.

7.3.1. Working hours

Figure 12. Working hours of factory workers by factory type



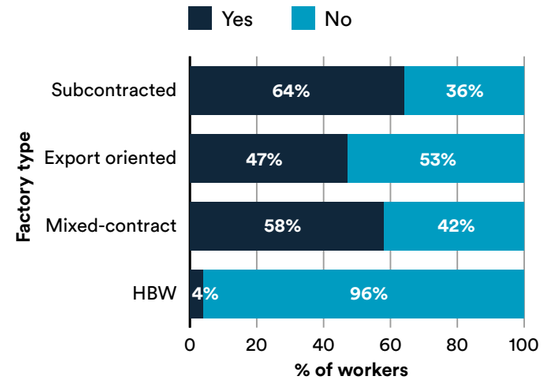
Any worker working above ten hours, six days a week (as is the common working week, see Section 4.5) exceeds the maximum limit of work plus overtime under the Bangladesh Labour Act. This applies to 28% (n=488) of factory-based survey respondents. Factory workers do not all work the same number of daily hours, with longer days experienced by those working in subcontracted factories (see Figure 12). Of workers in export-oriented or mixed-contract factories, 70% worked from 8am to 5pm (nine hours), with 11% working from 8am to 7pm (eleven hours). These hours mark the beginning and end of the working day and do not reflect breaks and lunch that may be taken. The reported hours reflect the total time spent inside the factory, including both standard and overtime hours.

7.3.2. Excessive overtime

Excessive hours of work combined with the inability to refuse such hours indicate a situation of excessive overtime per the ILO forced labour indicators.[68]

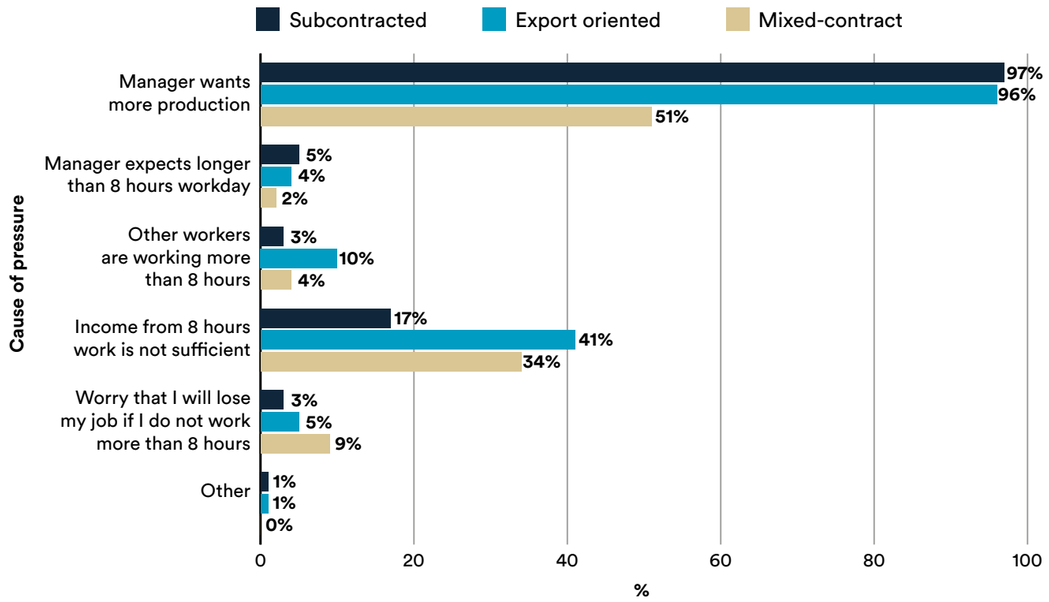
Among respondents who reported working more than eight hours a day, many indicated that they felt pressure to do so. The highest proportion of workers feeling this pressure was observed among those in subcontracted factories, with 64% (n=77) reporting such pressure (Figure 13).

Figure 13. Pressure to work more than 8 hours



Among minor respondents, 59% (n=72) reported feeling pressured to work more. For 86% (n=62) of these minors, the pressures came from managers who wanted more production, and 26% (n=27) said that income from eight hours of work was insufficient. Respondents were able to select more than one response as the cause of this feeling.

Figure 14. Cause of the pressure to work more than 8 hours (adult workers)

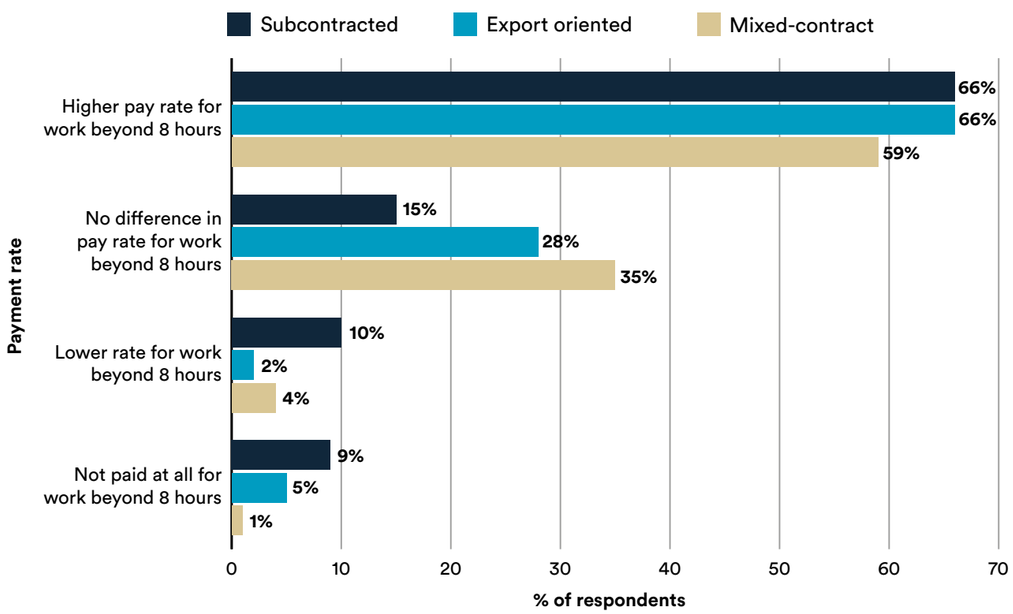


Among adult workers, the most common reason for the pressure to work more than eight hours was high production targets set by managers. A significant majority of adult workers who feel pressure to work more than eight hours cited this as the primary reason, with 96% (n=542) in export-oriented factories and 97% (n=75) in subcontracted factories identifying it as a cause of pressure (Figure 14). The second most common reason was that regular wages cannot cover workers' cost of living. **Qualitative survey data indicates that following the increase in the minimum wage in Bangladesh in December 2023, factories raised the daily production targets for workers to help reduce the pressure on finances.** FGD participants confirmed that since the minimum wage law was implemented, managers increased targets, such that workers cannot complete their required work within the standard eight-hour workday.

Although this should lead to additional overtime work and pay, many garment workers reported not receiving payment or receiving reduced payment for overtime hours if they did not meet their targets within the standard working hours. More than a third of workers in subcontracted factories (34%), export-oriented factories (34%), and mixed-contract factories (41%) reported the same or lower hourly pay rate when working beyond 8 hours (see Figure 15). One FGD participant reported that the factory management records overtime only up to two hours. After that, workers are requested to punch their card again and go back to work without recording additional hours. **This supports the qualitative survey data, which indicates that workers are expected to meet higher targets within their regular working hours. If these targets are not met, managers do not recognise the extra work as overtime. Instead, managers are requiring additional hours at regular pay rates.**

> *"They [the managers] increase our targets according to their will. They do not consider our work capacity. They make us work 10 hours instead of eight hours and cut our overtime payment." - 18-year-old male RMG worker.*

Figure 15. Payment rate for work beyond 8 hours



7.3.3. Production targets

Many survey respondents reported working long hours with excessive overtime, with just under 40% (n=769) of respondents stating they did not feel they had enough time to complete the work assigned to them. As 45% (n=895) of factory workers reported feeling pressure to work beyond a standard day, this suggests managers are using pressure as the mechanism to manage production loads.

Workers believed their managers increase the pressure of what needs to be achieved within their normal working hours in order to avoid paying overtime or increase targets at will:

> *"Where there should be two operators, they don't provide two operators. Instead, they assign one operator with a higher target. If the target isn't met, they make us work for two hours after the shift and cut our overtime pay." – 18-year-old female FGD participant.*

Factories may struggle to balance their workload throughout the year, which could result in increased pressure on workers during busy seasons, or layoffs and delayed payments in low seasons. In addition, FGD participants noted that hours could increase when the factory was close to a shipment deadline, and that managers were able to increase targets and hours and cut payment 'at their will', which left workers little choice but to comply or risk losing their jobs.

> *After minimum wage implementation, their factory reduced overtime work and increased the hourly target. Now they have to finish the same amount of work in eight hours which they used to finish in 10-11 hours by doing overtime. By doing so, the factory doesn't need to pay any extra money to workers as overtime payment. And the worker's income also remains as previous. - enumerator's notes during survey with a 21-year-old female RMG worker.*
>
> *"After the implementation of new minimum wage, the factory management fired many helpers. Now, operators have to do the job of helpers as well. That is why it became more challenging for the operator to complete the work." – 24-year-old male FGD participant.*

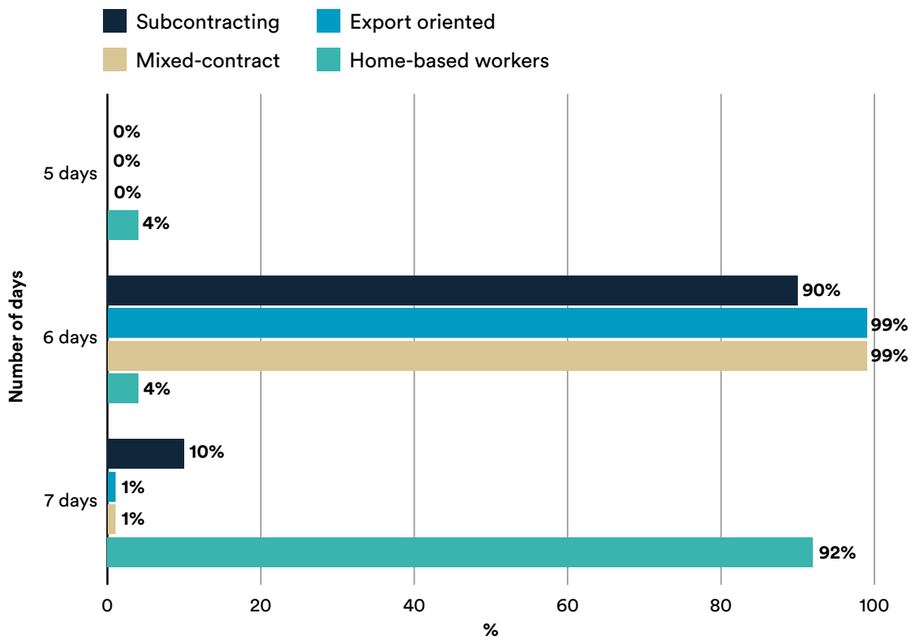
When discussed through FGDs, workers shared the stress they felt to meet targets, and the arbitrary way in which managers imposed them. Participants across all focus groups said they acutely felt the pressure of meeting production targets from the moment they entered their factory and are threatened with extended or unpaid overtime to make up the difference (known as *Fao Khatano*, meaning overtime work without payment).

> *"There is a lot of pressure at work. I can't move from my spot. I have to produce hourly. My target is 150 pieces. If I can't meet the target on time, I get scolded and yelled at." – 17-year-old male FGD participant.*

Female enumerator undertaking survey in an RMG worker's home

7.3.4. Working days and taking leave

Figure 16. Working days per week



The majority of factory workers reported working six days a week, but minors (25%) and workers at subcontracted factories (10%) were more likely to work seven days a week than adults at factories engaged in export (1%). In contrast, 92% (n=69) of home-based garment workers reported working seven days a week, though they work fewer hours a day and shared that they are happy with the flexibility to work around other family needs.

Approximately a quarter (26%, n=472) of all factory workers reported being unable to request an extra day off in addition to their weekly day off when needed, 40% of whom (n=190) were employed in export-oriented factories. The inability to take additional days off constitutes a violation of the Bangladesh Labour Act, which gives every worker the right to ten days of fully paid casual leave in a calendar year.[69] Casual leave does not affect annual leave, and workers can request it for personal emergencies or other reasons. Further, the ILO states, that severe breaches of labour law should serve as an "alert"[70] to the possible existence of coercion that is preventing the exploited workers from leaving the job.

> *He couldn't vote in the National Election because his factory granted him only one day of leave and he couldn't go to his home village to vote because the time was too short. He is upset about it. – enumerator's notes during survey with a 22-year-old male RMG worker.*
>
> *We do not get sick leave when we want. It often happens that workers are suspended without their payment." – 24-year-old male RMG worker.*

Three young people at a local park in Dhaka during a public holiday

7.4. Gender and abuse of vulnerability

While more women work in the RMG sector, they earn on average 2,000 BDT (18 USD) per month less than their male counterparts.

The RMG sector is gendered work, particularly in sewing machine operator roles. Women comprise approximately 54% of Bangladesh's RMG workforce.[71] In theory, it is a positive opportunity for women to be in the workforce in terms of global development targets, empowered by having access to their own income and skill development. However, the sector's labour structure - with many subcontracted sites often hidden from formal oversight (see Section 7.5) - also puts workers at risk of exploitation. This is particularly challenging for women, young workers, those with low education[72], and those who depend on the work for their livelihood due to poverty, leaving little option for work elsewhere. Migration due to poverty[73] is in itself a risk factor for forced labour.[74]

Studies indicate that legal protection for women in Bangladesh, including safeguards against gender-based violence, are often inadequate and grievance mechanisms are either weak or ignored by factory owners and managers.[75] As the RMG industry continues to grow, more women are migrating independently to cities specifically to seek work in garment factories, a shift from previous generations when women migrated with male family members.[76] ILO's data shows that there are more men than women in high level positions, with 83.8% of women workers in low grade roles, compared to 67.7% of men.

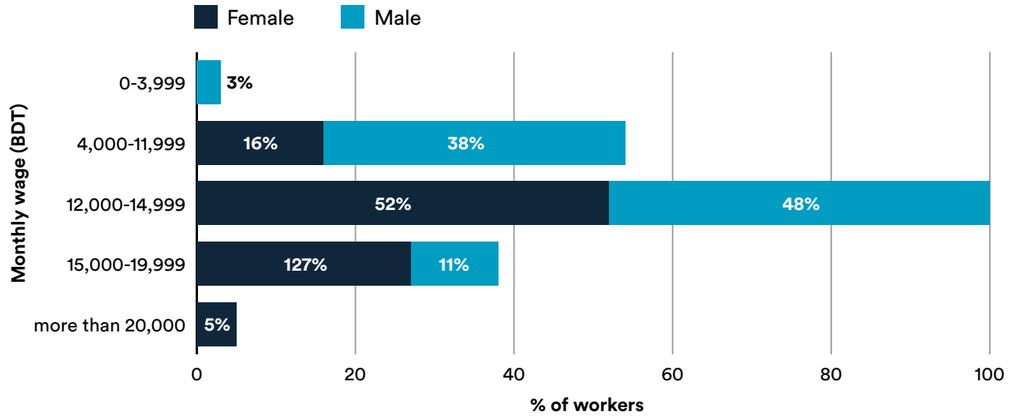
For example, the vast majority of line supervisor roles in the RMG sector are held by men.[77] Overall, numerous studies highlight that women workers in the RMG sector are particularly vulnerable to exploitation and discrimination.[78] Many find that women workers face exhausting schedules that can extend beyond the legal limits of working hours, not always with proper compensation (see further section 4 on legal terms of work in Bangladesh).

In truth, discrimination, underpayment, abuse, and exploitative practices are systemic across the sector, and worsened for those working at subcontracted factories. This section explores those practices and demonstrates a level of abuse of vulnerability which indicates forced labour.

7.4.1. Gender wage gap

The majority of survey respondents were female, accounting for two thirds (67%) of all adult respondents and over four fifths (83%) of all minor respondents. More women are represented in wage brackets under 12,000 BDT (108 USD) per month, and more men are represented in wage brackets above 15,000 BDT (135 USD) per month (see Figure 17). **The average female factory worker's wages are 2,000 BDT (18 USD) per month lower than the average male's wages.** While we did not capture how many men or women held supervisory or leadership roles, many described men in those roles and the wage gap might indicate that men are both being paid more for the same work, and more likely to have management level roles with higher wages.

Figure 17. Monthly wages of garment workers, by gender



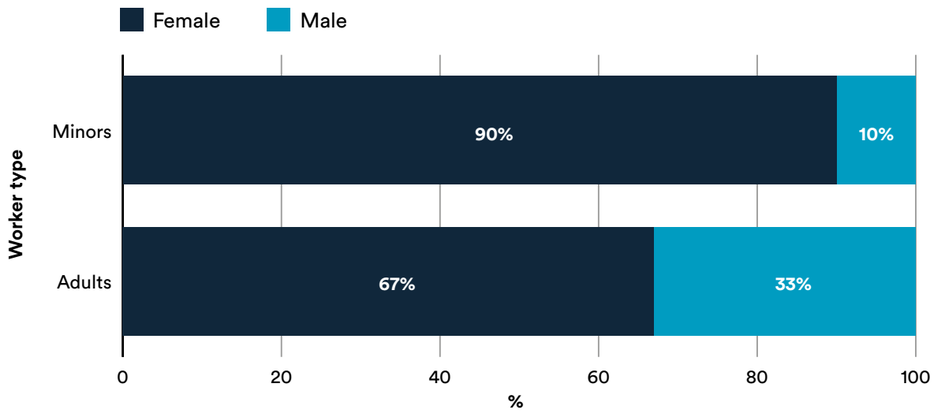
7.4.2. Gender-based violence

Both men and women reported forms of abuse in the factory (1,042 adults, 67%). However among minors, girls are nearly twice as likely as boys to report threats or abuse - 63% of girls and 33% of boys cited at least one incident of threat or abusive treatment (n=64 for girls, n=7 for boys, see Figure 18). FGDs containing minors supported this observation, with all male minor participants agreeing that abuse is worse for their female counterparts.

During FGDs, all participants agreed that, in general, women are treated differently from men in the factories. Participants observed a perceived "limit" on verbal abuse against men which is unchecked against women.

> *"Male workers protest instantly if they are abused, but female workers keep silent and do not say a word. They feel shy. That is why they abuse female workers more than male workers." – 23-year-old female RMG worker.*

Figure 18. Gender of workers who reported at least one type of abuse



Reasons for being abused included taking breaks at work, not meeting targets, and objecting to working conditions or wages. FGD participants in Chattogram also reported instances of physical abuse and hitting of women in the factories, which they perceived as a normalised culture in Chattogram. They also highlighted that women's shyness and vulnerability make them easier targets for abusive management, alongside a lack of proper monitoring or initiatives from government or NGOs to combat the issue. In addition, minors also mentioned experiencing physical abuse and inappropriate sexual advances from managers. Again, FGD participants noted that due to their shyness, they would not retaliate, and they did not feel they could speak up or change the issue.

> *"Whenever they find an opportunity, they touch us inappropriately, which female workers refrain from reporting due to shyness or embarrassment." – 19-year-old female RMG worker.*
>
> *"Women are pushed from their chair/machine if they cannot fill up the target. But they never do that to men." – 18-year-old female RMG worker.*
>
> *"Her factory doesn't recruit men as men protest against abuse." – enumerator's notes during survey with an 18-year-old female RMG worker.*

With men in supervisory roles, there can be doubts on how effective grievance mechanisms are as women are less confident to speak up and challenge management or may feel intimidated by managers if they are already experiencing verbal abuse related to targets and breaks. More on this topic is covered under section 7.6.3, but it is worth noting that Complaints Committees for sexual harassment are required to have female chairs, which suggests the Bangladesh Government also acknowledge the need for female oversight of gendered grievance processes.

Many women also shared that, in addition to these experiences and the long hours expected of them in the workplace, they had caregiving responsibilities at home, such as cooking and childcare, which had to be fitted around their shifts. This is not caused by the factory but may affect the energy and capacity of women to adapt to long hours and additional pressures felt at work. For some this meant rising very early or working late into the nights:

> *"After working for long hours inside the factory, I still have to work in our home like cooking, cleaning etc. and take care of my husband and children as well." – 23-year-old female RMG worker.*

7.4.3. Maternity benefits

The majority of adult respondents reported that their factory offers maternity leave (73%, n=1,242), with some of these having paid leave policies. However, thirteen workers specifically mentioned in addition to the set questions, **that their factories ask women to leave their job when finding out that they are pregnant**, or they are dismissed. Three workers reported the same story, that at seven months pregnant, workers are fired. One female factory worker said pregnant mothers are forced to resign as maternity leave is not provided. In her case, she felt she had to continue working and subsequently suffered a miscarriage, which the doctor attributed to workload.

> *"No maternity leave is provided here, so three girls working with me have been told to quit their jobs. They are advised to return after their babies are born." – 24-year-old female RMG worker.*

While some respondents said no lighter work is given, and the work was burdensome on the pregnancy, 79% of survey respondents noted that pregnant women are allowed to take a break if they feel sick during the working day. In some cases, pregnant mothers are not required to work beyond 5pm, and one reported that in their factory, which provides medical support and sanitary items for women, pregnant mothers are checked in on every three months.

Female RMG workers and one child outside their homes in Greater Dhaka

Case study: A female factory worker's perspective

The following case study illustrates a female factory worker's story taken from their own words, as described through a FGD. The name has been changed.

Ayesha's story

I'm 19 years old and live in Chattogram. I have been working for a garment factory as a sewing machine operator for six months now. We moved here because my family did not have enough food to eat in our home village, so my parents came to seek a better income. After moving here, we still could not overcome our financial constraints. I heard that the RMG factories recruit frequently so I got in line in front of the factory and got the job.

But in Chattogram life is difficult, very few factories keep up with the laws like minimum wage or have visits from buyers which means managers can get away with abuse, especially towards us female workers. Just to name a few problems: I have extreme work pressure, there is verbal abuse inside the factory for those who fall short of completing their targets. My friends have also said they have been physically assaulted, disrespected and supervisors touch them inappropriately whenever they find an opportunity. We hold back from reporting because of embarrassment.

We didn't get an appointment letter or sign a contract when we were recruited. We don't feel we have a legal base to claim our labour rights, and sometimes the factory fires us without notice but because we don't have savings, we can't risk not having work. My neighbours did warn me about the harsh realities of the sector, but I don't have much choice in terms of available jobs.

I start work at 8am and end somewhere around 9-10pm. We are not given any break to eat our morning snacks. Really the only thing I think of from when I enter the factory is fulfilling my target. The hours are long, but I can't afford not to do the extra hours. I rely on the overtime to pay some of our family's basic expenses, and they've also fired people for not doing that too. For those hours I get 7,500 BDT (68 USD) per month, but this is not enough to survive these days... We don't get sick leave either – our salary is cut for any kind of absence.

My friends and I would all agree: women are treated differently at work. I think the supervisor cannot cross a line with verbal abuse with male workers because male workers do not tolerate it. But for us, they disrespect our families, shout at us for small things and even push women from their chairs if they are not filling their targets. But they never do that to men. We don't feel safe, but we don't have any way to address it. When people have tried to raise issues with management the situation does not improve.

Our salaries should be increased, our overtime payment should not be cut. We need collective efforts to change the situation. My friends would also say we need a female committee or union to address the issues we face as women in the factories – from having separate toilets to the men to stopping the verbal and physical abuse we face.

7.4.4. Ethnicities

All respondents were born in Bangladesh, with none coming from neighbouring countries or reporting experiences resembling cross-border labour trafficking or facing challenges to do with migration status or discrimination as non-Bangladeshi nationalities.

Five respondents out of 1,852 were from tribal communities, with the majority located in Chattogram. In Bangladesh the total tribal population represents 1.8% of the population, as per formal records, and nationally are recognised to be the most deprived of economic, social, cultural and political rights, mainly due to their ethnic status.[79] However, while our survey results did not show a significant difference in responses related to abuse or wages, further research could be conducted to understand how they are represented in the garment sector and the challenges they face.

Female hanging washing outside her home in Greater Dhaka

7.4.5. Education and literacy

Seven percent of respondents did not attend school at all (n=129), and 12% of adult respondents (n=220) reported having attended some school but less than five years, the compulsory minimum in Bangladesh. For those who completed this minimum level of education, 1,317 respondents attended between 5 and 12 years (primary and secondary education, 71% of adult respondents). Less than 1% of people had bachelor's degrees (n=6) or master's degrees (n=6).

Most adult respondents (88%) were able to read and write (n=1,634), with 7% of respondents who could neither read nor write (n=133). Of those who reported being unable to read or write, the vast majority (73%) were female participants (n=97).

For the majority of workers (62%) who gave reasons for ceasing schooling (n=1,154), the main reason was their families' financial needs, and 19% (n=356) reported not being able to pay school fees. 15% stated that they stopped going to school because they got married (n=281). Of those who left education due to marriage, the vast majority (96%, n=269) were women. This, and the literacy statistics, show the gender dimension of education, and how garment sector work becomes the most feasible employment path for girls and women.

With limited education comes limited options for work, and many sectors employing lesser educated workers also provide limited income and development opportunities, as illustrated by this 17-year-old RMG worker:

> *"We don't have educational qualification. With minimal education, we can get a job in the garment industry."*

In addition, the lack of literacy leaves room for exploitative practices through the lack of understanding of contractual terms, the risk of manipulated work and pay records, and the lack of access to effective grievance and support mechanisms (see Section 7.6.3), putting these workers further at risk.

7.4.6. No alternatives

Among adult respondents, 20% of workers (n=373) reported they feel like they would rather leave their current job, but they feel they must stay and keep working as they do not have other alternatives. In contrast, nearly half of minors (48%, n=59) felt that way.

This study confirmed that in most cases, minors started working because their family needed financial support. Minors in FGDs also expressed that RMG is one of the few sectors that hires younger workers with limited education. The only alternatives mentioned were domestic work and one who worked in a shop, but this has further instability, unstructured hours or difficult working environments and RMG was the preferred option.

> *"Suddenly, her father fell ill. For the past two months, he has been unable to work. She is working in a garment factory at a young age to support her father's treatment and cover family expenses." – enumerator's notes during survey with a 15-year-old female RMG worker.*

Through limited education, limited options for women and young workers, and reliance on RMG salary, workers are often forced to endure exploitative practices in the factory.

7.5. Subcontracting

Due to lack of oversight nationally and internationally, risks of various kinds—from child labour to underpayments, safety concerns, and abuse—were more common in subcontracted factories linked to export than in those with direct links to international buyers.

Since the 1980s, international brands and retailers have been sourcing from Bangladesh directly and establishing their own local offices in Dhaka and Chattogram. Cheap labour in Bangladesh, combined with an abundant labour force and a light regulatory framework, has led to a supply chain largely driven by the demand for low prices and fast production times from international corporations.[80] This dynamic has encouraged the widespread practice of indirect sourcing, which means that many workers are employed in factories that indirectly supply foreign brands, often through larger factories or agents.[81] Subcontracting plays a role in maintaining overall production levels in Bangladesh, enabling bigger factories to efficiently handle sudden, increased orders during peak seasons.[82] The latest estimates are over 7,000 RMG factories producing for export in Bangladesh, split almost evenly between direct and subcontracted factories.[83]

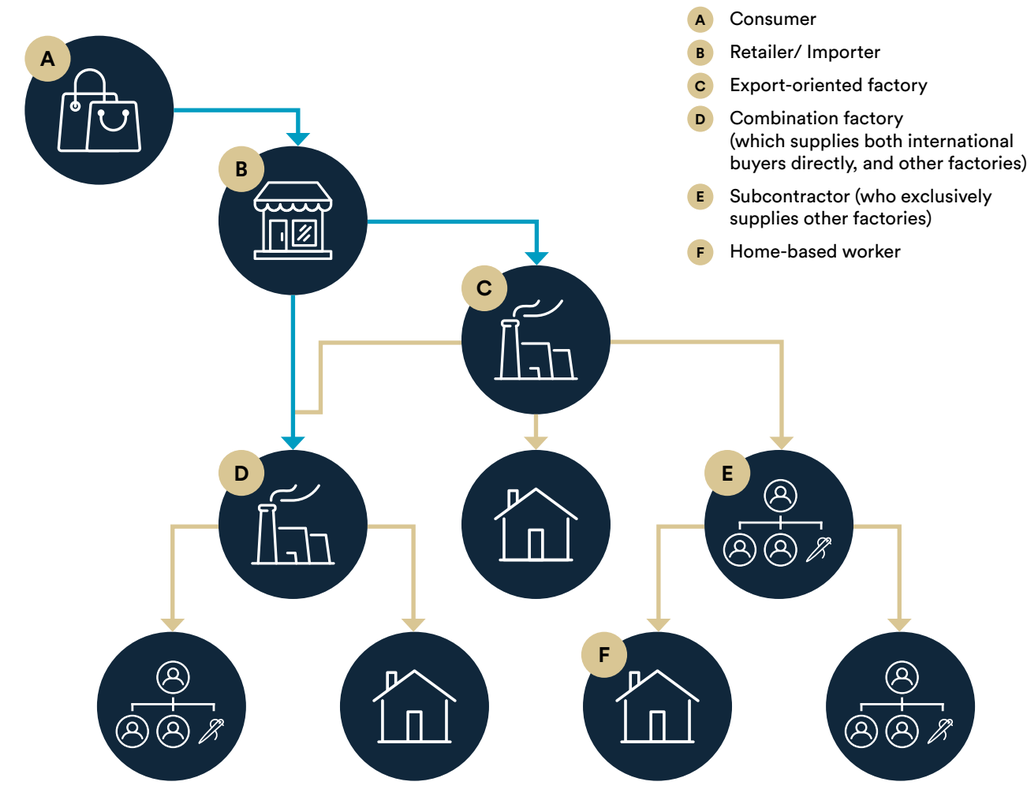
RMG factories work directly with brands as well as by working as subcontractors to other factories, or by a combination of both. When large formal factories face overwhelmingly large or simultaneous orders, they subcontract part or all the production to relatively low-cost small-scale factories, middlemen, or unregistered production units.[84] Most of the time these production units do not produce whole finished garments. Instead, large formal factories outsource specific tasks that typically involve either large-scale processes requiring special equipment (such as dyeing) or manual tasks (such as sewing labels, embroidery, or attaching buttons).[85]

These indirect (subcontracted) factories face minimal oversight and often operate under very tight margins. The lack of regulation significantly increases the risk of exploitation or safety violations, making workers more vulnerable to labour rights abuses.[86]

Depending on seasonal demand, mixed-contract factories may receive an influx of orders, leading them to subcontract out some of the work.[87] Conversely, during slower periods, they may seek additional work by acting as subcontractors for other factories. Among the factory workers, over two-thirds of adult respondents (68%, n=1,214) were employed in export-oriented factories (see Figure 21). Still, 7% of adults worked in factories that exclusively did subcontracted work, while nearly a quarter (24%, n=432) were employed in mixed-contract factories.

Garment worker conducting quality checks on finished products in the factory

Figure 19. RMG supply chain map

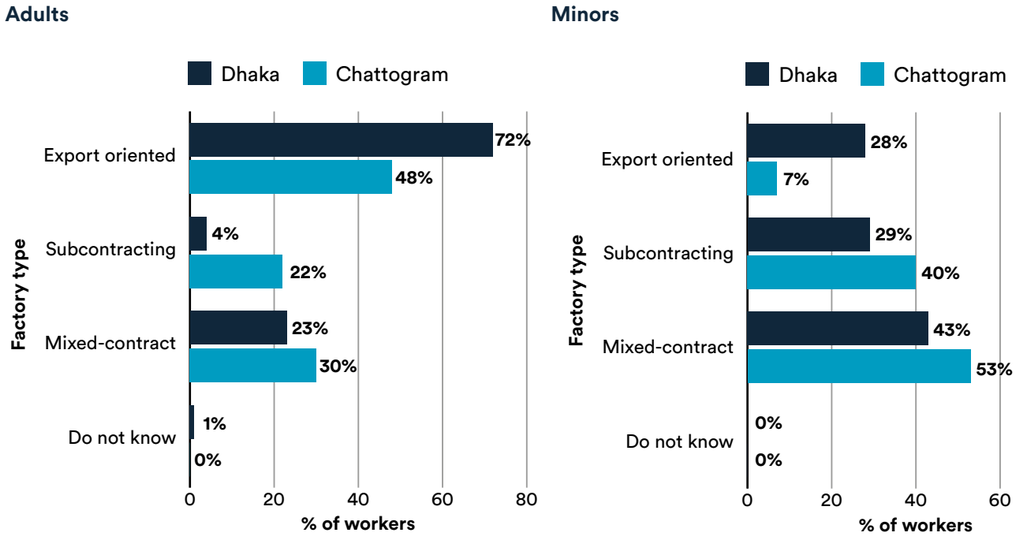


Often it is only the **blue** relationship lines which are visible to buyers, with subcontracting of any kind remaining undisclosed or inaccessible, posing greater risks to workers with no access to grievance or accountability mechanisms. **Throughout the study, we found that risks of various kinds, from child labour to underpayments, safety concerns, and abuse, were more common in subcontracted factories than in those that exclusively exported goods to international buyers.**

7.5.1. Risk in subcontracted factories in Chattogram vs Dhaka

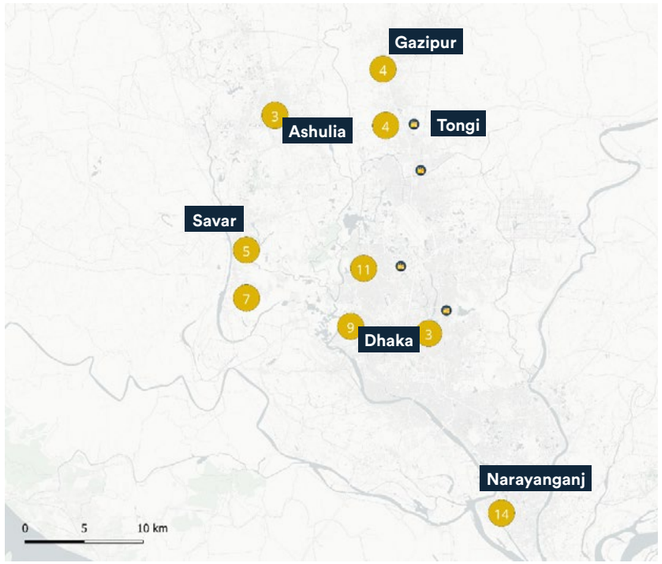
The analysis of factory-based respondents reveals significant regional differences in employment patterns between Dhaka and Chattogram, particularly regarding the prevalence of subcontracted work. In Dhaka, only 4% (n=64) of adult workers were employed in subcontracted factories, compared to 22% (n=57) in Chattogram. Additionally, 30% (n=76) of Chattogram workers were employed in mixed-contract factories, compared to 23% (n=356) in Dhaka. This disparity is intensified by the fact that Chattogram has many subcontracted factories, particularly in areas like Nimtola, CDA, and Chotopool.

Figure 20. Proportion of respondents performing factory-based work by factory type and location

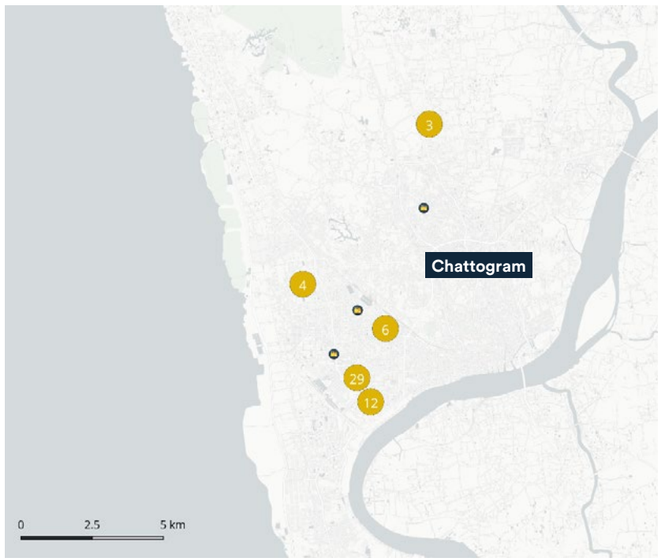


Female workers sorting bundles of cut garment parts ready for assembly in the factory

Map 4. Subcontracted factories located in the study: Dhaka and surrounding areas



Map 5. Subcontracted factories located in the study: Chattogram



Among minor respondents, 93% in Chattogram were employed in subcontracted or mixed-contract factories, with only 7% in export-oriented factories. In Dhaka, 72% of children worked in subcontracted or mixed-contract factories, and 28% were employed in export-oriented factories.

BLF, a labour rights expert NGO that co-implemented this research, noted that factory monitoring practices differ significantly between the two regions. In their experience, Chattogram is characterised by less regulatory oversight than Dhaka, which has led to a rise in subcontracted factories. This lack of monitoring was also perceived by workers in Chattogram and noted during FGDs. By contrast, Dhaka has more effective monitoring practices, likely contributing to the lower numbers of subcontracted factories observed there. This aligns with the observation that minors were predominantly employed in subcontracted and mixed-contract factories. The lack of oversight, combined with stricter scrutiny of major export-oriented factories under the law, enables young workers to remain hidden from both government and buyers.

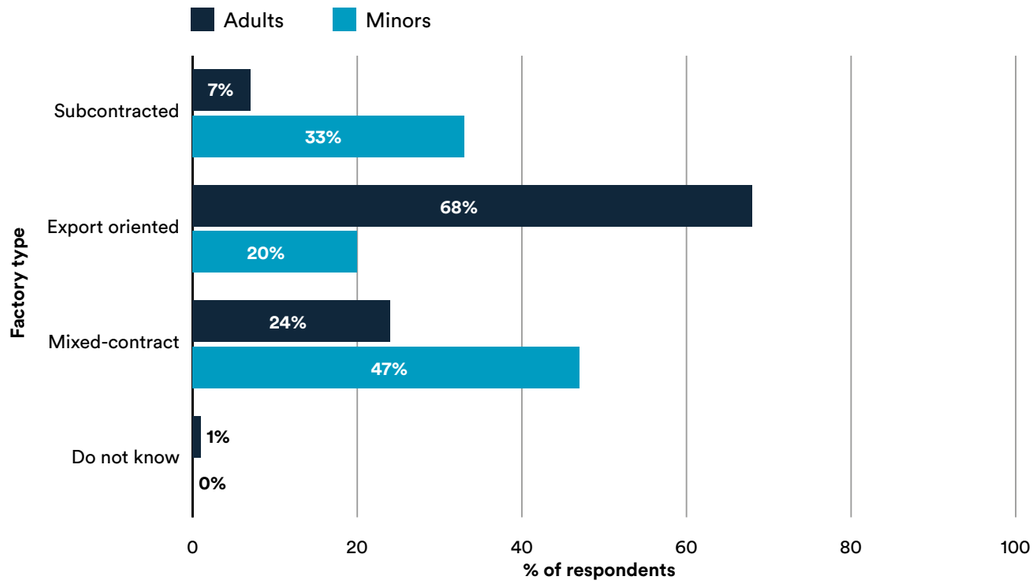
People in a residential street in Chattogram

In terms of signing written agreements, 53% of workers in subcontracted factories in Dhaka and 58% in Chattogram reported having a written agreement. Overall, most survey respondents in both Greater Dhaka and Chattogram reported having a written agreement. However, 45% of workers in subcontracted factories reported not having one, compared to only 7% in export-oriented factories. This demonstrates that the lack of formal agreements is more closely related to the subcontracting nature of work than to the factory's location.

7.5.2. Minors in subcontracted factories

Minor respondents were more likely to be working in factories performing subcontracted work. A third of minor respondents (33%, n=40) worked in subcontracted factories, while almost half (47%, n=57) worked in factories performing mixed-contracted work. Only one-fifth (20%, n=24) worked in factories exclusively performing export-oriented work.

Figure 21. Proportion of respondents performing factory-based work by factory type



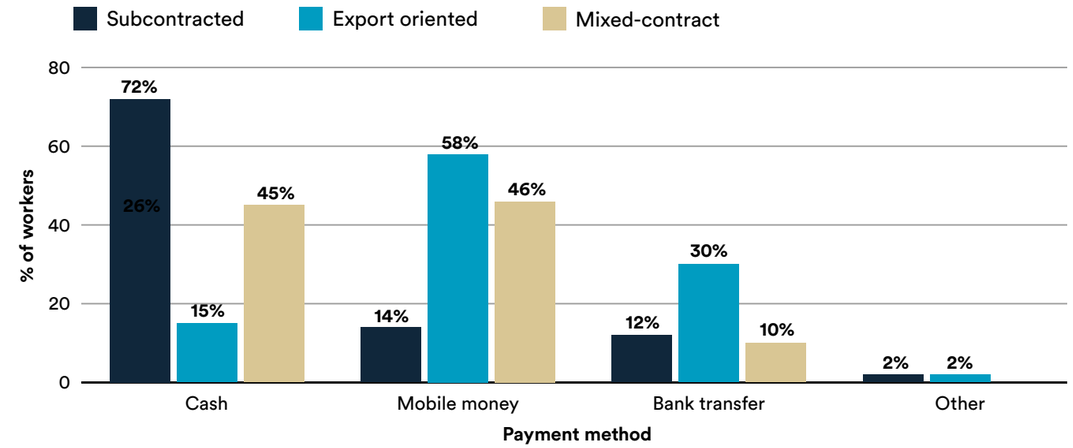
7.5.3. Wage payments, overtime & vulnerability

As explained in Section 7.2.2, **there is a correlation between cash payments and lower wages: workers paid in cash were more likely to receive lower wages compared to those paid via digital or bank methods.** They were also less likely to have a written agreement and to understand their terms.

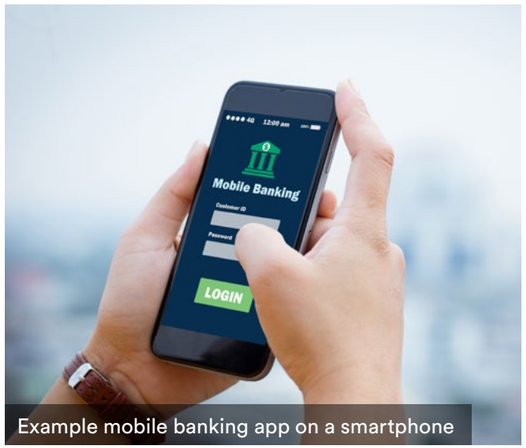
The majority of workers at subcontracting factories and nearly half of workers at mixed contract factories are paid in cash. Mobile banking is the most common payment type at mixed contract factories. Nearly half of those respondents in factories delivering mixed-contracts (46%, n=198) reported using mobile banking to receive their wages, while only 10% (n=43) reported receiving bank transfers for the same purpose.

Figure 22. Payment methods of factory workers

Note: participants may have reported multiple methods of payment and may therefore be reflected in multiple categories.



Workers in subcontracted factories were far less likely to be paid the minimum wage despite working the same hours as export factory workers**. More than half of workers in subcontracted factories reported earnings below the minimum wage (59%)**, while the same percentage of export-oriented factory workers (59%) reported earning above the minimum wage.



Example mobile banking app on a smartphone

It was more common for workers in subcontracted factories (31%) to work twelve or more hours per day, compared to those in export-oriented factories (13%) or mixed-contract (19%). Exclusively subcontracted factory workers were more likely to work seven days a week—10% compared to only 1% of respondents from export-oriented factories or mixed-contract factories who reported working without days off.

In subcontracted factories, just under half (49%) of workers also reported an 8 am to 5 pm workday, with others reporting extended hours, from eleven hours (17%) up to fourteen hours (12%). Fourteen hour workdays were far less common among workers at export oriented or mixed contract factories, representing only 3%.

Additionally, the data also shows that a higher proportion of workers in subcontracted factories (19%) reported either being paid a lower rate or not being paid at all for overtime, compared to a smaller proportion (12%) of workers in export-oriented factories or mixed-contract factories. **This highlights the greater exploitation occurring in subcontracted factories, as compared to export-oriented factories who are directly supplying international buyers, either exclusively or partially.**

Garment worker at sewing machine sewing a jean pocket

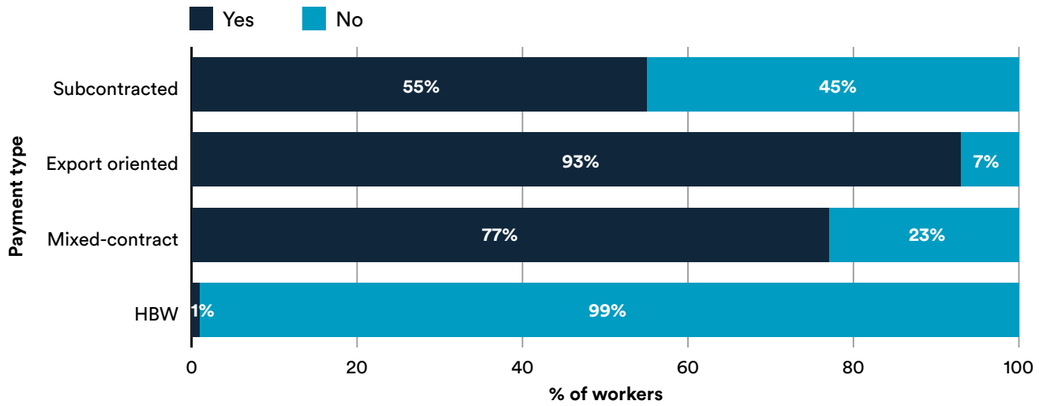
7.6. Abusive working conditions

Fifty-six per cent of factory workers surveyed have experienced threats or abuse at their current job—68% of adult workers and 90% of minors who reported abuse were female.

In this section we review experiences related to the terms and conditions around work, and the working conditions related to facilities, safety and experiences of abuse. Fifty-six percent of adult and minor workers across all factory types reported experiencing verbal intimidation and threats, with occasional forms of physical punishment and sexual assault, though predominantly verbal abuse at work. The ILO recognises verbal abuse as a form of coercion designed to increase their [the workers'] sense of vulnerability."[88] Additionally, the lack of formal terms of employment, effective grievance mechanisms, and other essential needs are factors that produce vulnerability to exploitation.

7.6.1. Written employment agreements

Figure 23. Written agreements for factory workers



Survey responses indicate varying likelihood of workers having written employment agreements based on the type of factory that employs them. **Workers in subcontracted-only factories are least likely to have written agreements**. Just over half of these workers reported having a written agreement, with the situation being particularly critical among home-based garment workers - out of 75 respondents, only one had a written agreement.

In contrast, most respondents working in export-oriented factories (93%) and those in mixed-contract factories (77%) reported having written agreements. Workers in export-oriented factories were also more likely to understand their written agreements and workers with written agreements were more likely to receive higher wages.

> *"They don't give us appointment letters because they show higher salaries to buyers but pay us less." – 22-year-old female FGD participant.*
>
> *"The management says, 'What will you do with appointment letter? You don't need that.'" – facilitator notes from adult female FGD discussion.*

Similarly, two-thirds of FGD participants never signed any kind of agreement upon employment; and many said they did not understand the terms of the agreement they signed. FGD confirmed questionnaire data, that factory workers were more likely to have written contracts, though some mentioned signing them without being given enough time to read or fully understand them. Many FGD participants expressed concerns about job insecurity, with fears of dismissal without cause. Those who recognised the benefits of a contract or appointment letter saw this as a mechanism to advocate for their rights and raise grievances with management.

> *"If we had contract papers, we could claim our labour rights. But now we do not have any legal base to claim our rights." – 20-year-old female FGD participant.*

The lack of clear terms of employment coupled with lack of awareness of rights increases vulnerability to deception about conditions of work, manipulation of wages and inability to raise grievances.


Male enumerator undertaking an interview with RMG worker at home

7.6.2. Intimidation and threats

Fifty-six percent of adult RMG workers and 58% of minors interviewed reported facing at least one type of threat (e.g. physical, verbal, or financial) for reasons such as taking breaks, contesting work conditions, or objecting to their wages. Women and girls accounted for 68% of reported abuses. Both survey and qualitative findings reveal the presence of this forced labour indicator among the workers who participated in the research.

> *"We are verbally abused badly inside the factory and sometimes even physically assaulted." – 20-year-old female RMG worker.*

The majority of survey respondents from export-oriented (53%, n=638) and subcontracted (69%, n=84) factories reported that they had been threatened or punished for taking a short break from work. All of these workers reported that employers' reactions to them stopping work included verbal abuse, shouting, and screaming. Verbal abuse was also reported by FGD participants for going to the bathroom, or going too frequently, or trying to take snack breaks. This was a particular problem for women during menstruation, and for those needing to hydrate during hotter months.

Nearly half of minors surveyed (42%, n=51) reported experiencing threats or punishment when taking breaks during the day. Among those who reported threats, most described forms of verbal abuse, such as shouting and screaming, but also verbal abuse in general.[9] Physical abuse was reported by a smaller percentage (6%, n=3), however any form of physical abuse towards young people in the workplace should be of concern. In terms of location, 49% (n=22) of **minors in Chattogram experienced threats and punishment if they stopped working, compared to 38% in Greater Dhaka (n=29).**

Many RMG workers reported being threatened or punished for not to finishing targets set by managers on time, which 30-41% of workers experienced across all factory types. As a form of punishment for not meeting the work expectations set by their employers, workers reported being verbally abused, shouted at, and, in some cases, physically abused. A minor from a FGD also reported experiencing inappropriate physical contact, described as "bad touches" from her employer, used as a form of punishment.

> *"According to her, the factory supervisors often physically touch the teenage girls. It is noted that girls are more abused than boys, if the target are not fulfilled." – enumerator's notes during an interview with a 21-year-old female RMG worker.*

FGD participants often cited not being shouted at as a primary response to what safety at work meant for them, with **one group reporting feeling unsafe when witnessing the "violent behaviours of management"**. While many factories where FGD participants are employed have strict rules *against* physical violence, some participants mentioned experiencing and witnessing pushing or hitting in the factory.

[9] By "verbal abuse" respondents meant that managers used bad language and insulting comments. In contrast, shouting and screaming were seen more as attempts to give instructions or tell them what to do.

7.6.3. Freedom of association and grievance mechanisms

Freedom of association refers to the worker's right to create or participate in an independent union or committee of their own choosing, to represent them in the workplace. This right enables collective action and is an essential part of the negotiation process between workers' groups and employers concerning working conditions and terms of employment[89]. The right to organise and collectively negotiate are enshrined in the fundamental ILO Conventions CO87 (Freedom of Association and Protection of the Right to Organise) and CO98 (Right to Organise and Collective Bargaining), both of which the government of Bangladesh has signed. The Bangladesh Labour Act 2006 provides a framework for freedom of association and collective bargaining. As per the law, all workers have the right to establish a union. If a union does not exist, and the factory has more than 50 workers, a Worker Participation Committee (WPC) must be established, but both may not exist in a factory at the same time. Despite the protections, overall trade union membership in the Bangladesh RMG sector is very low, with a reported 7.2 % of workers who are members[90]. Complaints committees overseeing sexual harassment complaints (chaired by a woman)[91] are also required in Bangladesh (see law review, section 4.1) as are Safety Committees as of 2015[92], in addition to a union or WPC.

Grievance mechanisms are processes by which workers can access remedy when laws, policies, or business processes fail to protect workers. Grievance mechanisms are another way for workers to communicate with management, specifically to address issues as they arise. These mechanisms are essential for workers to receive support or negotiate terms of work. In this section, we discuss the availability of worker representation and grievance mechanisms, as well as how frequently they are used by workers who participated in this study.

Workers surveyed from all factory contract-types mentioned availability of either a union or a Worker Participation Committee as forms of worker representation present in their factories. 52% of workers in subcontracted factories have a Safety Committee. Among export-oriented factory workers, 18% (n=215) reported having a trade union on-site. The most common form of workers' organisation was also the Safety Committee, with 90% (n=1,092) of respondents from export-oriented factories reporting the presence of at least one of these mechanisms.

> *"Women are verbally abused more than male. Women cannot protest and share with anyone about the abuse. So, the supervisors take advantage of that." – 29-year-old male FGD participant.*

Participation in these forms of representation remained low, with only 3% (n=34) of export-oriented workers reporting affiliation with either a union or participation committee. None of the workers in subcontracted factories reported having trade unions in their workplaces, leaving them without representation or means to bargain with employers. In addition, no respondents in subcontracted factories were affiliated with any other form of representation or committee.


Example complaints box

In terms of grievance mechanisms, some FGD participants mentioned the presence of a complaints box in their factory, where in theory they can raise issues with supervisors, managers, or owners. Such boxes are required since the enforcement of Complaints Committees and the amendments to Bangladesh Labour Rules in 2022 [93] (See section 4.1). Effective grievance mechanisms should be anonymous, enabling a worker to speak up without fear of retribution, however many reported this not to be the case, as illustrated by the following:

> *There is a complaint box but there is a CCTV camera installed above the complaint box. If someone put any complaint there, they look at the camera and treat them very badly. No one puts any complaint in the complaint box due to this fear. – enumerator's notes during survey with a 33-year-old male RMG worker.*

Many said that they do not have confidence that their grievances are addressed. Only two FGD participants and one survey respondent noted that appropriate action was taken as a result of a complaint. Some minors spoke about complaining about their wages, but received verbal abuse or threats of being fired, in response.

Other study participants mentioned protesting or complaining by other means. Thirteen survey participants shared with their enumerator that workers lost jobs in their factories for requesting wage increases. Only one commented that in their case, these requests successfully enabled an increase. Other complaints are met with challenges, as well as the threats and abuse listed in the sub-section above, such as: *"There are some leaders in the factory, if anyone says anything those leaders throw them out and workers are laid off"*. This leaves workers feeling that they have no ability to change their circumstances, as reflected in FGDs where many said that they do not have confidence that they are heard, or any action is taken with any form of complaint or grievance.

> *"We need a system where we can complain against the supervisors. Moreover, we need trainings so that we can learn about our rights." – 20-year-old female FGD participant.*

There is desire to participate, with one home-based worker expressing interest in being able to formally organise among themselves in order to advocate for their rights, and one female FGD participant sharing "*We need a female committee or female union of some kind to address the issues female workers face as a RMG worker."*

Without transparent and effective collective bargaining and grievance mechanisms in place, workers are unable to negotiate wages or see resolution for other issues, leaving them at-risk of exploitation.

7.6.4. Injury and medical care

The majority of adult respondents reported receiving some form of medical care if they were injured in the workplace. However, compared to workers in export-oriented factories (93%, n=1,133) who reported receiving medical support at work, only slightly more than half (51%, n=62) of subcontracted workers reported the same. Among workers in mixed-contract factories, 72% said they receive medical support for injuries.

In contrast, less than half of the minors (45%, n=122) reported receiving medical support at the workplace for injury or illness. Through FGDs, all minors who participated shared that they do not have access to medical facilities and are often forced to work while ill and then scolded for delays in production.

Nearly all FGD participants were either not given sick leave or their pay was docked when they took sick leave, with additional time deducted as a penalty beyond the time taken off. All participants, including home-based workers, felt increased production pressure upon returning to work after sick leave.

> *He has been working in this factory for seven years, but they do not grant any leave, even if someone is sick. If they take leave, their salary is cut. Even if they are sick, they have to work. – enumerators note during an interview with a 29-year-old male RMG worker.*
>
> *Even if he is sick, he is not given leave and is told to quit the job. Two days ago, his hand was burnt, but he was not given any medicine or leave. – enumerators note during an interview with a 17-year-old male RMG worker.*
>
> *"Once while I was cutting threads, I accidentally cut my skin. They wrapped it with a dirty torn cloth and sent me home. Later I had to buy medicine with my own money. They deducted one day's salary." – 12-year-old male FGD participant.*

Heat stress, while not one of the principal focusses of the research, emerged as a significant issue for garment workers. Some workers spoke of witnessing colleagues passing out while operating machines or getting sick because of the heat, to then be given saline water and told to return to work. During the FGDs, a number of minors reported experiencing extreme heat in the factory and noted that fans did not work properly. **Additionally, minors expressed fear about safety conditions in the factory, including working under extreme heat but also lack of basic safety provisions such as fire extinguishers.** In combination with restricted breaks and limited access to bathrooms, workers are apprehensive about the health and wellbeing impacts of hot days. Research exploring climate change impacts on workers is underway[94] but noting the harm it brings, this should be pursued with greater urgency.[95]

> *The factory does not have enough fans. There is also no provision of saline water or hydrating drinks during the summer, nor is there any provision of cold water. – enumerators note, 24-year-old male RMG worker.*

> *"I feel very bad in this extreme heat. There is no ventilation system inside the factory." – 15-year-old female FGD participant.*
>
> *"Inside the factory there is extreme heat. The fan is not doing any good. We feel exhausted and many of us get sick due to extreme heat." – 17-year-old female FGD participant.*

7.6.5. Workplace hygiene

Qualitative data from surveys and FGDs revealed issues with using bathrooms that are not separated by gender, especially for women during their menstrual period. Workers interviewed during survey collection reported that some managers turn off water in bathrooms if they believe workers are using the facilities too frequently. Some workers reported a shortage of bathrooms relative to the number of workers, with only one bathroom available in some cases. Additionally, some minors reported that bathroom doors at their factory do not have locks, which prevents them from using the facilities.

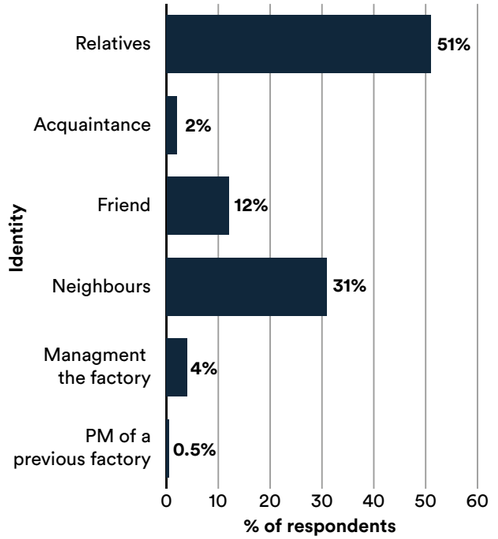
> *"We need separate washrooms for female inside the factory. Because during menstruation we feel difficulties." – 15-year-old female FGD participant.*
>
> *"We need separate toilets for men and women and regular water supply inside the toilets." – 19-year-old female FGD participant.*

7.6.6. Deceptive recruitment

Deceptive recruitment can involve false promises about working conditions and wages, as well as about the type of work, housing and living conditions, legal migration status, job location, or the identity of the employer. In such cases, workers do not fully voluntarily accept terms and conditions of work, because they are presented as more advantageous than reality. Exploiting someone through the use of deception is one example of forced labour and human trafficking.[96]

None of the focus group participants were recruited through an agent or third party under deceptive circumstances. No participants had to travel into Dhaka or Chattogram specifically for the job, most had already moved to the area in search of work when they took on the role.

Figure 24. Identity of recruiters



The majority of survey respondents (88%) stated they did not accept their current job nor were they recruited by a third-party agency or individual. Those who said they were recruited (n=219) reported finding their jobs through relatives (n=113), neighbours (n=67), friends (n=26), and management of the factory directly (n=8) (see Figure 24).

While the forms of deception in these cases were not directly linked to coercive and deceptive recruitment like in many global trafficking cases, the definition laid out by the ILO for the forced labour indicator of deception is still present for some, where employers failed to uphold all terms and conditions what were promised to the worker, either verbally or in writing: *"...once they begin working, the promised conditions of work do not materialise, ...workers find themselves trapped in abusive conditions without the ability to escape. In these cases, workers have not given free and informed consent."*[97]

Only 8% of survey respondents who were 'recruited' in some way reported that recruiters made false promises about working conditions. However, in these cases the recruiters were not employers. FGD participants said they were not made any particular promises regarding salary or other terms of work. Consequently, the research did not find evidence of deceptive recruitment.

> *"They don't pay the salary they promised. As an operator, I was supposed to get 12,500 Taka, but with overtime, I only received 10,500 Taka." – 19-year-old female FGD participant.*

7.7. Home-based work

Home-based work is precarious, but workers surveyed feel safer from abuse when they work at home and appreciate flexible work hours.

At the bottom of the RMG supply chain sit home-based workers, a form of informal, subcontracted work. Here factories offload batches of tasks to workers who operate based in their households in peak seasons. Home-based workers perform value-add tasks (such as separate embellishment and embroidery items) or support with more common tasks (such as cutting and stitching garments), that are then transported to export-oriented factories for the finishing stages, usually through agents or contractors,[98] commonly referred to as "middlemen". These workers generally perform their task at home rather than in employer-provided facilities and are paid based on the number of pieces they produce.[99] (See Section 7.5 for supply chain map infographic)

As workers are home-based, little is known about the conditions of work, safety, hours, and use of child workers, posing concerns about risks to workers. It has been generally assumed that home-based work predominantly feeds the domestic market in Bangladesh.[100] However, our study shows that there are home-based workers who supply factories for the export market.

While in many ways the testimonies of workers in this study show relatively comfortable working arrangements against their factory counterparts, home-based workers remain vulnerable to exploitation due to the lack of oversight and accountability mechanisms. Work is more precarious, and there are no contractual obligations in place to advocate with factories for worker rights and working off-site limits visibility to buyers oversight. Due diligence laws will require brands to make more of an effort to work with factories to understand and disclose a fuller picture of subcontracting, including home-based workers, and any consequences of work which might result in human rights abuses.

7.7.1. Wages and workloads

It was common for home-based workers to be paid per piece of production (52%, n=39), compared to factory-based workers, where only 1% (n=21) were paid per piece. Among home-based workers paid per piece, the most common rate was 8 BDT (0,07 USD) per piece (21%, n=8), and 4-6 BDT (0,03-0,05 USD) per piece (35%, n=14). Additionally, 13% of piece rate home-based workers reported being paid between 12 and 25 BDT (0.1 and 0.2 USD) per piece (n=5). Most home-based workers completed 20-30 pieces per day (48%, n=19), but some (depending on the type of piece) also mentioned completing 125-200 (n=2). As respondents were completing different kinds of tasks, these numbers are not necessarily comparable between respondents. They could be paid monthly, weekly, or something in between depending again on the type of work and size of batch they were given.

While factory workers surveyed reported working nine to 14-hour days, home-based workers reported shorter hours, with 59% working three to five hours per day. Most workers (68%, n=13) worked 30 days per month. The remaining 32% worked between 20 and 28 days per month (n=6). The vast majority of this group of home-based workers reported earning between 4,000 and 5,999 BDT (36 and 54 USD) per month. While not entirely comparable to the hourly minimum wages, piece-rate payment remains a precarious, low-income source.

There was only one minor home-based worker in the survey, a 14-year-old girl who had already been working one year. She reported being paid per piece on a weekly basis, working on average five hours a day for 20 days per month, though sometimes after 7pm. For producing 20 pieces per day, she was paid 4 BDT (0,04 USD) per piece, resulting in a total monthly earning of 1,600 BDT (14 USD). Another 14-year-old FGD participant said that home-based work enabled her to continue studying while also earning flexibly on the side along with her neighbours.

7.7.2. Home-based workers' working conditions

FGDs with 18 home-based workers helped paint a clearer picture of their conditions of work. For many, **home-based work income was supplementary to other household incomes and the nature of home-based work enabled them to still earn an income while managing other chores and familial care duties.** In one FGD, women found it also a social task, sometimes working together, and were inspired by neighbours to take the opportunity up.

Home-based workers expressed concerns about loadshedding, where local electricity provisions are overloaded and blackout, causing machines, lights and fans to stop working. Workers mentioned feeling safe as they did not have factory managers standing over them, and did not have to face verbal abuse that is common in factory settings. If they cannot complete their work in time, their middleman negotiates with the factory, so **home-based workers are shielded from the abuse that factory workers receive for not meeting targets.**

Orders ebb and flow depending on peak or low seasons, hence income from home-based work is precarious. Participants did not share concerns about middlemen's abuses. They also mentioned having agency to refuse work and being aware that factories need their work to complete orders, hence a good working relationship with contractors assigning them work was in the interest of all parties involved.

Home-based worker shows her sewing machine and working space at home

Case study: A home-based worker's experience

The following case study illustrates a home-based worker's story taken from their own words, as described through an FGD. The name has been changed.

Corridor to home of a worker in Chattogram showing electrical cables and washing lines

Sumaiya's story

I am 25 years old and live in a village in the Greater Dhaka area. I have been working from home for the garment sector for three years now, but I moved to the area a long time ago with my family when my father could no longer find work in the village where I was born. But this is a rural area too. We do not have much to do after our household chores are finished, and prices of household commodities have increased so that is why I took this job. Other women from my village also do this, so we work and earn to help the family and there's a sense of togetherness in this. If I am honest, we don't always have enough food to eat, even if we are a smaller family we do not have much money left after paying our rent, so we rely on vegetables and lentils.

I like the work as it keeps me busy and helps us have enough food, but sometimes I feel pain in my eyes and my neck. My work involves keeping my head down for precision work that requires long periods of staring at small details.

I buy my own tools and equipment that I need for the work, but it helps me get jobs easily, and I have been able to grow more skilled at finding work. At the moment, I make small, embroidered flowers which will be added to dresses for export. Sometimes we have a problem of loadshedding in the village which means the electricity gets overloaded and stops.

This is difficult if I have to use a sewing machine or need lights to work in the evening. Having a lot of fabric in the home sometimes gets in the way and I am worried about fires or my child hurting themself.

I do not have a contract, but I agree with the middleman if I want to take on some more work and we talk about the price per piece and when the factory needs it delivered by. Sometimes I have to collect and drop off the pieces by myself and I also pay for the transport. Protection for me means that I get paid on time for this and the correct piece rate. Sometimes the middleman does not give me the full amount that was agreed. I do complain that the piece rate is low, but I want the work, so I do not push too much. This work is also seasonal. I would prefer to have regular work throughout the year, but it helps.

I get up around 5 am to do morning prayers, clean the house, and prepare food for my husband and child. I sit to work around 9 am and work till lunch time when they come back from work and school to have lunch. After they leave, I can rest a bit and work more through to the evening around the mealtime. Only if we have an urgent deadline do I have to work into the night but usually I can stop working at 9 pm. I like the work because I can take breaks when I need to and do my household chores too. We do not get paid for longer hours we just need to finish the pieces. If I am sick, the middleman takes more work to other people or gives me less. It means less payment, but I can decide if I hide my sickness and keep working, or if I stop. They deal with the factory, which is better for me.

The main things me and my other village home-based workers want are regular work year-round, free school for my child that is nearby, uninterrupted energy supply and increased piece rate. The other home-based workers agree that we would like to be more united and form a trade union to raise our voice for our rights, because it is different from working in a factory.

8. Conclusions and Recommendations

8.1. Conclusions

This study offers a clearer picture of the relationship between subcontracted work (in factories and home-based work) and the RMG export market. It unearths new evidence on the risk of forced labour and child labour within these contexts, evidenced by the numerous interviews and discussions with workers and minors in twenty locations. The study found that many minors and workers are experiencing exploitative practices at work, aligned with several of the ILO's forced labour indicators, including:

- The presence of child labour, including under illegal terms of work and in hazardous conditions.
- Abuse of vulnerability of individuals living below the poverty line, who are too impoverished to decline or negotiate work.
- Abusive working conditions, intimidation, threats and various forms of physical and sexual abuse in the workplace, experienced by 56% of workers, especially women and girls.
- Excessive overtime, with over a quarter of workers under pressure to work over the maximum legal limit of working hours under Bangladeshi law.
- Withholding of wages, including delays and underpayment of overtime, which increases financial pressure on families already struggling to afford food, rent, and other living costs.

With changing climate conditions and internal displacement, pressure on meeting excessively high production targets, and purchasing practices from global buyers that put suppliers at a disadvantage, the conditions workers endure are not likely to improve without long-term, targeted interventions at and beyond the first tier of RMG production.

As ever we are humbled by the hard work and commitment of the RMG sector workers who spoke up about their experiences and shared their ideas for a better industry, we wanted to include some of the hopes FGD participants put forward for progress and improvements of their conditions, in their own words:

> *"It must be ensured that we are not verbally or physically assaulted inside the factory."*
>
> *"We need unity among workers, and training, so we can raise our voice for our rights."*
>
> *"We need collective efforts to change our situation."*

8.2. Recommendations

The recommendations provided in this study are designed to inform and advance efforts to protect RMG workers from forced labour and child labour. The recommendations speak to specific issues identified in our research, and at the same time take into consideration the current local context and the global regulatory landscape.

As this report is finalised, Bangladesh stands at a pivotal moment, grappling with overlapping political, economic, and labour market challenges. High inflation, political uncertainty, and escalating labour unrest in the RMG sector underline the pressing need for coordinated action among stakeholders, including government agencies—both in Bangladesh and in countries that import RMG from Bangladesh—private sector actors, and global and grassroots civil society organisations.

The Bangladeshi government has taken steps to advance workers' protection, for example through the 18-point agreement reached between the interim government, RMG suppliers, and trade unions in September 2024 and the ratification of the 2014 ILO Forced Labour Protocol in 2022.[101] While these reforms provide a foundation for progress, their timely and effective implementation remains critical for achieving protection for workers and children connected to Bangladesh's RMG supply chain and increasing their resilience to forced labour and child labour risk.

At the international level, new mandatory human rights due diligence standards—such as the EU's Corporate Sustainability Due Diligence Directive, as well as forced labour bans in the US and the EU—are imposing stricter requirements on human rights due diligence, directly on large international buyers and indirectly on their business partners. Understanding the current situation of the RMG sector in Bangladesh, and taking meaningful steps towards improving these conditions, is therefore both critical and necessary for legal compliance.

Recommendations are provided for four key audiences: the Bangladeshi government; suppliers; international buyers; and trade unions and NGOs, which include grassroots civil society organisations and multi-stakeholder initiatives and voluntary social sustainability standards.

(1) Map supply chains to understand how lower tier worksites feed into RMG exports

Government of Bangladesh

- Simplify the registration process for smaller worksites that still operate without trade licenses to encourage their formal registration.
- Mandate exporters' disclosure of their suppliers and subcontractors.
- Maintain an open, updated database of registered factories and collaborate with similar mapping/transparency initiatives run by NGOs.
- Strengthen oversight of factories' subcontracting practices in manufacturing hubs where risks are higher, such as Chattogram.

International buyers

- Conduct supply chain mapping to identify suppliers beyond direct suppliers, both upstream to processing and raw materials or component suppliers and laterally to subcontractors and home-based worksites.
- Maintain up-to-date lists of suppliers, publish them, and engage with data collection and sharing initiatives that research, map, and publish information on RMG supply chain networks within Bangladesh and beyond.
- Develop detailed guidelines on subcontracting in consultation with suppliers and civil society organisations that can provide technical expertise, to ensure that RMG production occurs in compliant facilities.
- Ensure internal and supplier staff are trained on these guidelines.
- Review purchasing practices to reform those that increase production pressure on suppliers, and in turn the risk of undisclosed subcontracting and wage payment delays, such as orders with unattainable delivery time or last-minute changes to planned orders.
- Incentivise, rather than penalise, suppliers' disclosure of subcontracting practices.
- Streamline the subcontracting approval process for small production units to ease the production target pressure that pushes suppliers to outsource orders to undisclosed subcontracted worksites.

Suppliers

- Develop a supply chain disclosure fact sheet in consultation with brand partners to capture all relevant data related to subcontracted orders and practices and commit to keeping it updated.

NGOs and Trade Unions

- Collect community- and factory-level data on how smaller RMG worksites are linked to global export, including home-based units, and share insights into human rights abuse risks at these levels with businesses, suppliers, and the government. Such investigations should employ methods of canvassing factories within specific areas and linking them to their downstream buyers, determining if they produce RMG for the global market.
- Deploy or expand initiatives to support transparency, e.g. central databases that list factories and categorise them as exporters or subcontractors or both, to help the convergence of terms and understanding of factories' roles in the wider RMG industry.

(2) Assess risk of forced labour and child labour in the RMG sector

Government of Bangladesh

- Include Export Processing Zones (EPZs) in the remit of the Bangladesh Labour Act's application, ensuring that all workers, regardless of their worksite's designation, are protected under the same national standards.
- Strengthen labour inspections conducted by government bodies, such as the Department of Inspection for Factories and Establishments (DIFE), to include forced labour and child labour risk assessments in all worksites, including subcontracted and home-based settings.
- Increase the number of labour inspectors to ensure adequate coverage of the labour force of approximately four million workers engaged in RMG production.

International buyers

- Include subcontracted and home-based worksites in risk assessments, taking into account the specificities of these work settings and differences with large, formal factories.
- Include frequent, effective engagement with rightsholders—workers and their communities, including children, and other stakeholders, including suppliers, NGOs, and Trade Unions—to gather insights on forced labour and child labour risk and to inform due diligence strategies.
- Where sampling is used in supply chain inspections, prioritise high-risk suppliers (for example, unregistered, small, remote worksites) and high-risk processes (for example, processes that are manually intensive, can be easily done off-site, or are very likely to be subcontracted) in line with international standards' criteria of negative human rights impact severity and likelihood.
- Establish and maintain a local presence in proximity to key sourcing hubs, or partner with reputable grassroots organisations, to conduct regular, high-quality monitoring at exporter, subcontractor, and home-based sites, and engage with workers and their communities.

Suppliers

- Implement a structured, risk-based approach to monitor and assess your own suppliers, including subcontractors and home-based workers.
- Prioritise high-risk tiers of the supply chain by identifying suppliers involved in manual, labour-intensive, or easily subcontracted processes.
- Provide accurate, detailed, and transparent information about known or potential forced labour and child labour risks during risk assessments performed by brands, including in subcontracted and home-based worksites.

NGOs and Trade Unions

- Share findings on forced labour and child labour risk gathered through community- and factory-based initiatives with brands and suppliers to inform their risk assessments.

(3) Enforce payment of living wages and overtime compensation

Government of Bangladesh

- Establish a minimum wage requirement for working minors.
- Enforce minimum wage laws through more frequent, unannounced inspections by the DIFE, including in subcontracted factories.
- Increase penalties for wage violations and non-payment of overtime.
- Set minimum wages at a level that aligns with a living wage that considers inflation and the cost of living—e.g. food, sanitation, housing, clothing, commuting, etc.—in production hubs like Dhaka and Chattogram.
- Set up a predictable wage review process that addresses the growing inflation, moving beyond the current five-year cycle.
- Involve workers and trade unions in wage reviews and negotiations to adjust them to inflation.
- Facilitate open channels for collective bargaining, ensuring that trade unions can negotiate on behalf of workers for better wages and benefits.
- Prohibit anti-union practices by employers, such as intimidation, harassment, or unfair dismissal of union members.

International buyers

- Build suppliers' capacity to implement systems for tracking and managing working hours and wage payments, ensuring compliance with international and national legal limits.
- Conduct regular, independent wage audits to identify and rectify underpayments.
- Include gender disaggregation to identify gender pay gaps, and piece-rate wages paid to home-based workers, to assess if compensation aligns with legal and living wage standards.
- Utilise wage audits' findings to develop corrective action plans in collaboration with suppliers.
- Increase cost prices to include a premium that can be transferred to workers as a bonus or additional allowances to cover the current gap between minimum and living wages.
- Collaborate with other buyers sourcing from the same suppliers to equally or proportionally contribute to the overall premium to close the living wage gap.
- Review purchasing practices and rectify issues that cause wage payment delays for suppliers, such as last-minute changes to planned orders, delayed payments, and unjustified order cancellations or modifications. Such reviews should involve the highest level of leadership for sign-off.

Suppliers

- Implement transparent payroll systems with digital payment methods to ensure compliance with minimum wage laws and prevent wage theft and tampering with paper pay slips and timecards. Track all hours and pay, including overtime, within these systems. Cover costs of such systems for workers and explain how they work and what to expect.
- Adopt equity policies ensuring equal pay for equal work and offer leadership and skills development programs for female workers to access higher-paying roles.
- Guarantee timely payment and overtime pay for work beyond eight hours. Avoid inflating targets that deny workers their overtime pay.
- Provide allowances for housing and transportation for workers on top of the minimum wage, instead of deducting them from workers' salaries.
- Provide workers with other allowances that help increase wages or decrease costs for workers: e.g. holiday bonuses, allowances for children's education, daycare, and meals.

NGOs and Trade Unions

- Lobby for regular wage reviews that account for inflation and the cost of living, while ensuring that gender pay disparities are addressed.
- Conduct worker awareness campaigns on legal wage entitlements and support advocacy initiatives to address gender wage disparities.
- Provide capacity building and training for workers on tracking and calculating overtime pay to increase their understating of rights and entitlements.

(4) Cease, remediate and prevent abusive and discriminating working conditions

Government of Bangladesh

- Enforce laws that prohibit workplace discrimination, harassment, injuries, and abuse.
- Ratify the ILO's Violence and Harassment Convention 2019 (No 190) and introduce national legislation to eliminate gender-based violence in workplaces.
- Prohibit anti-union practices by employers, such as intimidation or unfair dismissal of union members.
- Implement a national referral mechanism to ensure victims of forced labour are referred to remediation services.
- Ensure workers have access to independent reporting bodies and effective legal recourse for abuses in the workplace.
- Train and equip labour inspectors to identify human rights violations but also provide actionable recommendations for factories to support remediation and management system improvements.

International buyers

- Include requirements to protect workers from human rights abuse in codes of conduct and thoroughly explain expectations and procedures to internal departments, including buying and human resources, as well as to suppliers. Ensure requirements are cascaded to suppliers beyond tier 1.
- Design factory inspections and corrective action plans with a focus on better working conditions for workers and capacity building to achieve stronger management systems for suppliers, rather than on punishment.
- When egregious labour violations are identified, ensure prompt safeguarding and remediation for the individuals involved and that necessary improvements are made at the worksite to prevent future occurrences instead of terminating the business relationship.
- Include guidelines on climate impacts—such as heat stress—in the health and safety sections of codes of conduct.
- Support climate adaptation projects in suppliers' factories.

Suppliers

- Provide all workers with written contracts that list terms and conditions of work. Verify that subcontractors provide written contracts to their workers, including those who are home-based.
- Develop and enforce a zero-tolerance policy for abuse, intimidation, and harassment in the workplace.
- Implement measures to avoid discrimination against pregnant workers.
- Establish gender-sensitive, clear reporting mechanisms and train managers and supervisors on workplace ethics and respectful behaviour.
- Set production targets that align with legal working hours and set up systems to demonstrate that the targets can be realistically attained in an eight-hour shift. Involve workers and their representatives in decisions on target setting and permissible overtime.
- Grant days off to workers when requested and in line with the Bangladesh Labour Act section on casual leave on top of paid time off.
- Grant paid sick leave to workers and provide access to free, immediate, and adequate medical care and injury treatment at work and adjusted work schedule and tasks to allow recovering after a work accident.
- Ensure worksites are equipped to prevent overheating by implementing effective cooling systems, providing hydration stations with clean, cool water, scheduling work during cooler hours, and training workers and supervisors to recognise and respond to heat-related illnesses.

NGOs and Trade Unions

- Conduct campaigns to educate workers about legal working hours and overtime entitlements, resources available to them, and how to recognise and report abuse, especially for women workers.
- Advocate for formal inclusion of home-based workers in labour laws.
- Provide legal aid services for workers experiencing workplace violations and safe spaces to raise complaints.

(5) Cease, remediate and prevent child labour

Government of Bangladesh

- Coordinate efforts among agencies responsible for implementing the *National Plan of Action on the Elimination of Child Labour*. Enforce existing laws on child labour, including age verification and legal work hours for under-18-year-old workers, and stricter penalties for suppliers found using children who are under legal work age or employing adolescents in hazardous work.
- Strengthen labour inspectors' ability to address child labour by increasing capacity, resources, and training.
- Expand the reach and frequency of unannounced inspections to verify compliance with child labour law, including in EPZ for inspections, and in subcontracted worksites.
- Legally establish a compulsory education age to align with the minimum age of work of 14 years.
- Support education initiatives, such as free, flexible schooling options or evening classes and vocational training for children transitioning out of labour.

International buyers

- Strengthen policies and protocols for remediation of child labour by including procedures to follow, roles and responsibilities of parties involved, and pathways based on the type of child labour identified (e.g. if bonded, or employed in hazardous work but within age limits, under-age, etc.)
- Conduct, directly or through third party auditors, unannounced inspections specifically targeting subcontracted factories, where child labour risk is higher, and gather information from complementary sources like grassroots NGOs and trade unions on higher-risk production hubs.
- Engage suppliers and NGOs to identify programmes for child labourers to gain legitimate work and vocational or school education to earn income and build skills, while protecting them from hazardous work.
- Give suppliers clear and consistent guidance on hiring and tasking young workers (14-17 years old), to provide legal employment while aligning with legal limits.

Suppliers

- Implement rigorous age verification systems that can detect fraudulent documentation. Ensure that subcontracted factories to whom orders are outsourced also have age verification systems in place.
- Establish child labour remediation programs to transition identified child workers to education and vocational training programs in partnership with NGOs, and that consider the need of these minors to continue earning income.
- Require buyers to provide guidance on parameters to hire young workers, for example when the allowed age threshold in their codes of conduct is higher than national law.

NGOs and Trade Unions

- Advocate for and provide prevention services such as school enrolment, scholarships, and life skills training for vulnerable children.
- Connect young workers with businesses and government to ensure access to legal and safe employment.
- Launch community-based programmes to address poverty-driven child labour through financial support for vulnerable families.

(6) Establish effective grievance mechanisms for workers

Government of Bangladesh	■ Implement a robust system to receive and manage forced labour and child labour violation grievances from grassroots to national levels. ■ Put in place a comprehensive plan for enhancing the capacities of line agencies to manage such grievances effectively or refer them to partner organisations. ■ Foster partnerships with NGOs to raise workers' awareness about the grievance mechanisms available in Bangladesh, how to use them and what to expect. ■ Embed best practices from organisations running independent grievance mechanisms to improve government-run channels.
International buyers	■ Strengthen anonymous and effective reporting procedures and whistle-blower policies at the company level. ■ Verify that all suppliers, including in upstream supply chains, establish and maintain effective and transparent grievance mechanisms. The mechanisms should be anonymous, unbiased, non-retaliatory, and accessible to all workers. ■ Ensure all third-party verification systems include requirements for effective grievance mechanisms and adequately evaluate grievance mechanisms and logs. Require suppliers to share grievance logs transparently to second- or third-party certifiers/verifiers. ■ Share a summary of complaints lodged and status of the resolution in public corporate social responsibility reporting.
Suppliers	■ Introduce or strengthen effective grievance mechanisms beyond traditional worksite-level channels and adopt whistle-blower policies. ■ Strengthen the role of Bangladesh Garment Manufacturers and Exporters Association (BGMEA) as a mediator for factory-specific disputes and advocate for peaceful dialogue to resolve issues. ■ Allow the formation of independent trade unions in factories and adopt additional, complementary complaint mechanisms such as an existing hotline for workers developed and run by independent third parties and/or NGOs. ■ Monitor the presence and effectiveness of grievance mechanisms set up by subcontracted entities and request them to report on the nature, frequency, and outcome of grievances. ■ Make all workers aware of grievance mechanisms available to them, especially those who may face barriers in accessing site-level mechanisms, such as home-based workers, and protect complainants from retaliation. ■ Take action to resolve every grievance submitted within a suitable timeframe and track the outcomes of grievances.
NGOs and Trade Unions	■ Raise awareness about existing, effective reporting mechanisms and help workers access these systems safely. ■ Support buyers and suppliers by designing and delivering training for factory management, on establishing and maintaining effective grievance mechanisms.

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