



Digital RMG Factory Mapping in Bangladesh (DRFM-B)

VISION FOR AT TRANSPARENT AND ACCOUNTABLE INDUSTRY

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Mapped in Bangladesh

Vision for at transparent and accountable industry

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MAPPED IN BANGLADESH

Vision for a transparent and accountable industry

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Executive Summary

From 2017—2021 the Laudes Foundation (formerly the C&A Foundation) and the Embassy of the Kingdom of the Netherlands partnered with the Brac University's Centre for Entrepreneurship Development (CED-BracU) in the Digital RMG Factory Mapping in Bangladesh (called 'Mapped in Bangladesh' or 'MiB') initiative. The initiative's overarching goal was to ***“provide industry stakeholders with real time, credible RMG factory data through an interactive online platform, enabling greater accountability and transparency in supply chains, and enhancing confidence in the ability of the sector to contribute to equitable development in Bangladesh”***¹

In line with the Laudes Foundation's program theory of change and results rubrics it was – amongst others – envisaged that:²

- Brands would learn about any additional locations, where their products are produced, and help to improve working conditions in those factories, including indirect suppliers and subcontracting factories
- Workers would use the mapping and data from the transparency programs in negotiations and bargaining efforts.
- The national government would implement new policies and demonstrates greater enforcement of existing laws and policies, once they are informed about or can confirm the existence of invisible factories.
- Workers' rights organisations could use the map to focus their work on those areas with the highest intensity of factories.

This report presents the findings of an independent evaluation of the MiB initiative. The evaluation used the Laudes Foundation's generic evaluation rubrics, aligned with the initiative's intended results, as its evaluation criteria. These rubrics were developed to enforce a certain way of thinking and a focus on change. They were introduced at the same time as the MiB was implemented; so, many of the evaluation criteria were not – could not – be directly considered or reflected in the initiative's initial design. Therefore, the evaluation findings should be read with this circumstance in mind.

The context of the implementation

Several challenges and barriers to achieving greater transparency within the Bangladeshi apparel sector were encountered during the initiative's implementation.

Maintaining reliable records is an enormous task that requires automation through a central authority such as the Bangladesh Garments Manufacturers and Exporters Association (BGMEA) or the Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA).

Manufacturers and brands are reluctant to share information publicly. One major reason for this is their fear of losing business, because of inadequate social compliance performance – especially given the increasing focus on environmental issues. Those manufacturers, which do take the bold step of disclosing more information, sometimes face criticism and a potential loss of business. Furthermore, the information that is publicly available currently exists on different technology platforms, which are supported by various transparency-related initiatives.

Therefore, the MiB was introduced to and implemented into a context where tracing and keeping track of the factories that produce – either directly or indirectly – for international brands is a challenge. Moreover, the sector has a limited tradition of data-driven planning and decision-making, and its key industrial

1 Grant proposal

2 Proposal narrative and Logical Framework

partners are extremely concerned about the possible, negative consequences of data disclosure. Finally, financial and political interests are high within the sector and are difficult to challenge.

The initiative

The nature of the intervention, itself, also affected the assessment. Although the initiative's ambitions for data use (as described above) were substantial, the evaluation finds that Mapped in Bangladesh was, and is, first and foremost a 'basic research' or 'pioneer' initiative, which aims to create a foundation for other actors' understanding, interest, demand and use.

As the history of science illustrates, 'pioneer work' and the process, from 'data production' to the data's use and contribution to shorter- and longer-term societal changes can neither be taken for granted, nor assumed to be straightforward, short or even predictable³. Therefore, assessing the value of a 'basic research' initiative, such as the MiB, and measuring its impact against its ability to contribute to shorter- and longer-term changes such as those envisaged in this project- within four years – may be premature.

Therefore, the findings outlined in this report must be read and interpreted with these contextual and methodological limitations and challenges in mind.

Findings:

Progress towards the initiative's Logical framework and shorter-term outcomes

As mentioned above, the evaluation finds that MiB represents a piece of 'basic research' that aims to provide a foundation for other actors' understanding, interest, demand and use of primary data about the RMG sector in Bangladesh.

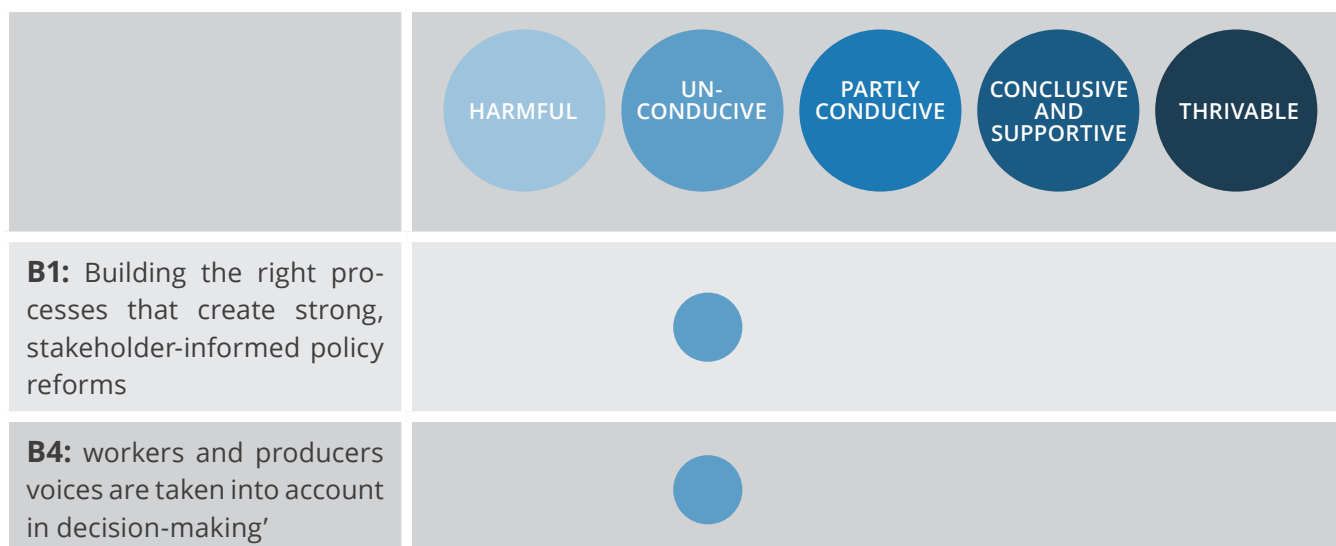
The MiB partnered with business associations, BGMEA and BKMEA, and with the Department of Inspections for Factories and Establishments (DIFE), as a research and data collection initiative, in order to collect data from those factories which export +80% of their ready-made garments. As of December 2021, the initiative had more than 800 non-member factories in the MiB platform, plus 'active' BGMEA and BKMEA member factories: a total of 3,485 factories, including the brands they produce for, their certifications and their inspections. The initiative also developed and rolled out well-tested procedures and software for data collection, verification, analysis and display, in all the garment-producing districts in Bangladesh (see annex IV). Furthermore, the data set complied with the Laudes Foundation's definition of 'useful data' in several aspects (see annex V).

However, measuring the impact of a 'basic research activity' against its ability – in four years – to contribute to: ***building the right processes that create strong, stakeholder-informed policy reforms***, or against their contribution to a situation where ***'workers and producers voices are taken into account in decision-making'***, may partially ignore the fact that an understanding of the data, as well as interest and a demand must be in place first.⁴

These are challenges that MiB is still struggling to address and which are reflected in the ratings of the intervention's contribution to short-term outcomes, as below.

³ When the physician and scientist Niels Bohr received the Nobel Prize in 1922, for his discovery of the atom, he was happily unaware of how this discovery would contribute to the terrible bombings of Hiroshima and Nagasaki 23 years later.

⁴ This outcome is partly reflected in the Laudes Foundation's evaluation rubric B7 'redefined value', which assesses the extent to which initiatives contribute to a situation where 'methodologies that effectively measure risk, value and performance relating to . . . social equity has been adopted by business. . .' but has not been used as an evaluation criterion for this evaluation.



The evaluation finds that, although the initiative is beginning to show signs of affecting some stakeholders' demand for and use of data (to verify information), the produced data does not yet contribute to building the right processes to create strong, stakeholder-informed policy reforms, not does it contribute to a situation where workers and producers' voices are taken into account in decision making.

The reasoning for this is explained below.

Building the right processes to create strong, stakeholder-informed policy reforms (B1)

The evaluation finds that, despite the positive interest shown in the map from almost all of the interviewed informants (trade union representatives, factories, INGOs and brands), the data that is displayed on MiB is only used by a few stakeholders.



'Conditions that are barely survivable, cause stress and other enviromental or health problems'

The quantitative data analysis suggested that MiB had 5.185 returning users, which is an indication that they have a genuine interest in the site. However, the website's setup does not allow the evaluation to trace if, or for how long, users interacted with the site. Notwithstanding, the evaluation can conclude that when the map was accessed, it was used first and foremost as a 'directory', to look up individual factories. This was confirmed by some of the informants, who said that journalists and labour inspectors mainly use the map to look up basic information about factories' locations and sizes.

So far, any users who contacted MiB directly to ask about additional data were mainly academicians, who wanted to use the data for research.

The fact that MiB is restricted in its data collection and publication by the business associations within the PAC, prevents the project from realising its original mission to include second- and third-tier factories in the map. For their part, the business associations are concerned that disclosure of data from these factories will harm the industry.

The evaluation did not find any evidence – so far – that the data has found its way directly into policy makers' discussions and agendas.⁵ However, recent contact between MiB and the EU Representation in Dhaka, as well as the Ministry of Labour and Employment suggest that this could change over time.

On this basis, the evaluation concludes that the initiative's contribution to building the right processes to

⁵ See the Laudes Foundation Evaluation Rubric B4 "unconductive" for an in-depth description of the evaluation criteria

create strong, stakeholder-informed policy reforms is, as of now, uncondusive overall.

For more information, [see "3.2.1 Design \(A1\)"](#) Building the right processes to create strong, stakeholder-informed policy reforms.

Workers and producers' voices are considered in decision-making (B4)

The evaluation further concludes that the initiative has not affected the power and influence of civil society organisations, movements or networks representing workers, producers or brands. Given the initiative's nature and primary focus on data collection and display, the evaluation questions whether affecting power relations is within MiB's sphere of influence. Additionally, although there might be progress in the sector at large, and the MiB could contribute to this, any evident progress and change so far is slow, and too slow to achieve a thrivable position by 2030.⁶



'Conditions that are barely survivable, cause stress and other enviromental or health problems'

The evaluation found that the disclosed data was mainly used by journalists, to verify basic facts about factories that have had an accident; by labour inspectors, to identify factory locations; and by trade unions, to identify factories' contact details. The randomly-sampled trade unions operating in the garment sector (13) that were interviewed expressed only a limited understanding of why and how the initiative could be of interest to them, in the current circumstances. Thus, whereas the initiative represents some well-intentioned efforts to respond to the needs of the sector at large, the qualitative and quantitative data that was collected by the evaluation team does not suggest that the initiative has been able to create the necessary demand for and capacity among stakeholders to use the data. It also has not promoted a situation where policy makers and other stakeholders systematically incorporate the input from sector stakeholders into their determining, enacting and/or monitoring changes in policies and practices.

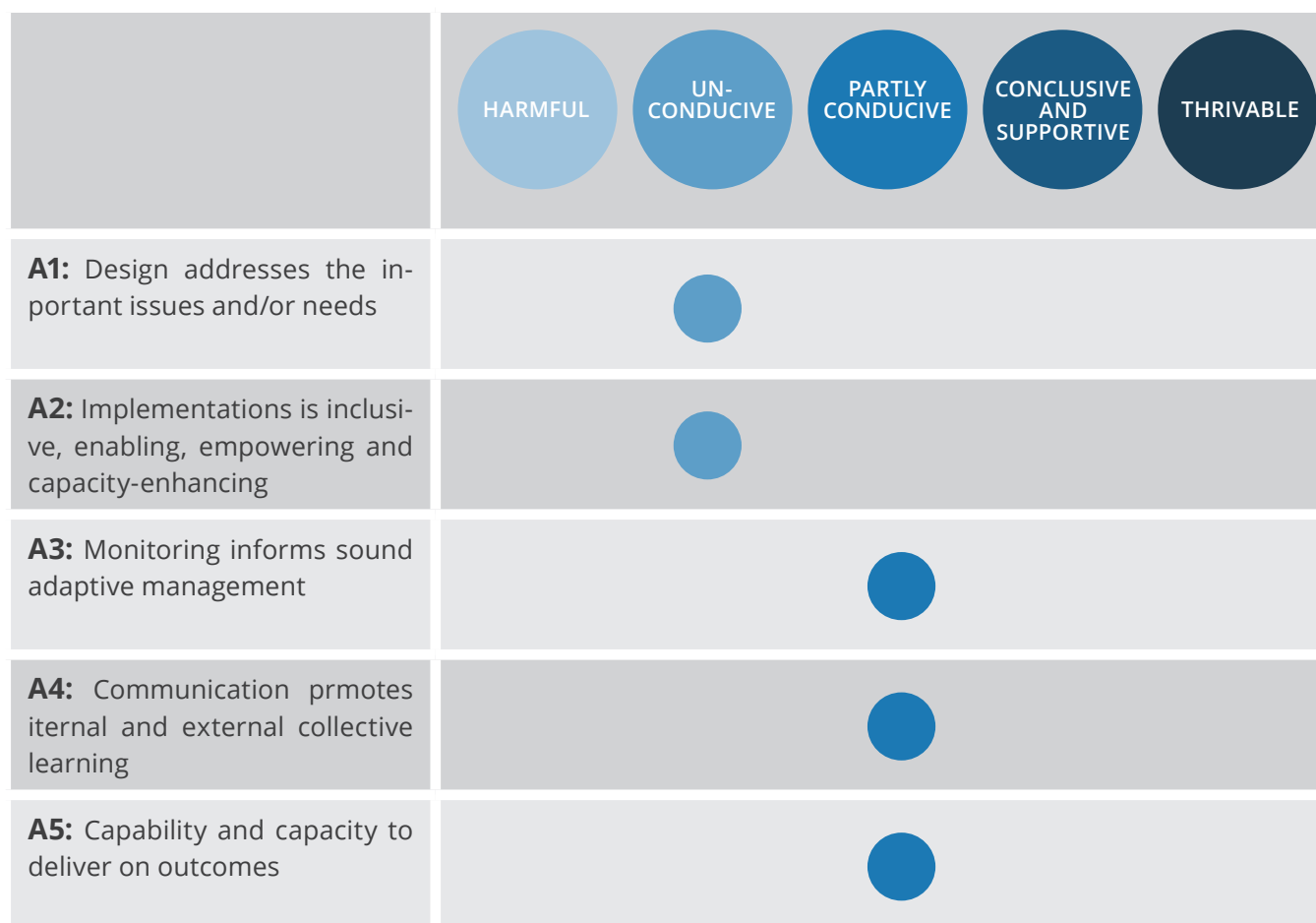
An open question remains about how and to what extent MiB should and can fulfil this task without affecting its position as a 'neutral' and independent data provider, as well as whether MiB should concentrate on its main strength: the production of reliable data.

On this basis, the evaluation concludes that the initiative's contribution to ensuring that workers and producers' voices are considered in decision making are uncondusive overall.

For more information, [see "3.2.2 Workers and producers' voices are considered in decision-making"](#)

Process findings

The difficult political and cultural context of implementation also affected the quality of implementation.



Design (A1)

The evaluation finds that the design responded to a need for undisputed data in the RMG sector in Bangladesh. Given that, its partnering with Brac-U, a university with a solid name and reputation, was a good choice. However, after

being faced with contextual challenges linked to; Covid-19, internal stakeholder resistance to the idea of data collection and disclosure, and the difficulties associated with tracing and keeping track of factories that open and close in the RMG sector, the subsequently amended and implemented project is still struggling to address some of the unanticipated challenges linked to data collection, data updating and communication. Moreover, the design did not address the obstacles workers and factories face in using data for planning and campaigning, although this would have been a precondition to ensuring that workers would use the data.



'Conditions that are barely survivable, cause stress and other enviromental or health problems'

This led to challenges associated with the implementation of the census model (which was otherwise a sound methodological choice). Data collection and updating took longer than anticipated. It was also difficult for the key stakeholders to reach a consensus among themselves, about which date should be collected and uploaded and, indeed, whether data from indirect suppliers and subcontracting factories (second- and third- tier factories) should be included at all. It is worth noting that these factories often have a high prevalence of non-compliance with legislation and best practices in working conditions.

Therefore, the evaluation finds that the design was uncondusive overall.

For more information, [see "3.2.1 Design \(A1\)"](#)

Implementation (A2)

The evaluation finds that the project's implementation was adversely affected by the corona-related lockdowns during 2020 and 2021, as well as the slow and hesitant buy-in from brands, trade unions, authorities and factories which were not directly involved in the project. Despite this, the project must be commended for its ability to collect, verify and publish data from 3.485 factories, although these were concentrated around first-tier factories (BKMEA and BGMEA members and non-members) with direct export to international brands.



'Conditions that are barely survivable, cause stress and other enviromental or health problems'

The coming months/year will validate whether the project's crowd-sourcing approach offers an effective solution to the need for a continuous update of data from factories that have been mapped, and whether it is also able to 'capture' and map newly-opened factories.

Various personnel issues hampered the project's ability to address and positively impact the internal dynamics of the Project Advisory Committee (PAC) and to build relationships with key stakeholders in the sector. These entailed; a leadership vacuum within the MiB, including the fact that two project managers were replaced within the grant period; the grant holder shifted from BRAC-US to BRAC-Bangladesh; and the leadership changed in – the strategic partner, BGME. Thus, the PAC's work was delayed by inconclusive discussions about the criteria under which factories were to be included in the map and what data were to be published. These discussions were also delayed by the business association's concerns about the possible adverse consequences of data collection and disclosure for the industry. Over time, this may have affected the motivation and ownership of the initiative among members of the PAC and, de facto, contributed to marginalising others (for example, trade unions) from discussions in the PAC. Although these limitations adversely affected the project's effectiveness, they were not harmful to organisations participating in the initiative.

The resistance revealed and concerns expressed by some PAC members led to a situation where second- and third-tier factories were omitted from the map.⁷Therefore, the project's implementation diverged from its initial idea, which was to develop "a concrete and comprehensive database of the RMG factories, focusing especially on gathering currently unknown data from Tier 2 and 3 factories".

On this basis the evaluation finds that the project implementation was unconductive overall. For more information, see "3.2.3 Monitoring and adaptive management (A3)

34"Implemetation (A2)

Monitoring and adaptive management (A3)

In a project context that was characterised by strong vested interests among the different stakeholders, consolidated power relations, the Covid-19 pandemic and the ongoing challenges linked both to data collection and data updating, the evaluation finds that the initiative's monitoring and adaptive management was partly conducive. The initiative was monitored in a way that enabled adjustments and responses to technical issues and challenges and used real-time adaptive management to adjust project activities, according to findings and lessons learned. The dialogue between the Laudes Foundation and the BracU was close and continuous, and Brac openly shared challenges and frustrations with the Laudes Foundation – both in writing and verbally. Therefore, the Laudes Foundation was informed about the project's progress in detail. However, its adaptation and adjustments were not sufficient to respond effectively to some of the structural weaknesses in the design and implementation, nor the magnitude of the contextual challenges faced by the initiative.



'Conditions that protect some of the people or the enviroment but have serious gaps'

For more information, see "3.2.3 Monitoring and adaptive management (A3)"

⁷ This evaluation defines Tier 1 factories as factories exporting directly to brands. Tier 2 factories are factories where Tier 1 factories get their materials or semi-finished products. Tier 3 factories are factories who typically work in raw materials

Communication and learning (A4)

Stakeholders in the RMG sector have different perceptions about transparency and its purpose, and face different obstacles to using the data about transparency. Although the initiative invested time and resources

in inception and experience-sharing workshops with stakeholders, the evaluation is concerned that the project's communication about the initiative's purpose and possible use did not address existing stakeholders' different perceptions and expectations towards data collection, transparency and disclosure, rather than harmonising expectations and strengthening understanding of how the data can or could be used.



'Conditions that protect some of the people or the environment but have serious gaps'

In 2020 and 2021, BracU invested significantly in communication across the network of potential and actual stakeholders (particularly in INGOs, academics and factories). This included direct emails to international and national workers' rights organisations, who might have found the data useful; reports and webinars about how the Covid-19 pandemic affected the sector overall; small introductory and instructional videos in English and Bangla for trade unions, factory owners and brands about how they might use the MiB; and a newsletter, to strengthen the stakeholders' awareness of the MiB and the data collected but not published on the map. The interviewed stakeholders perceived the provided information as reliable, and saw MiB as a reliable source of information about factories in the RMG sector in Bangladesh. Although video materials are in Bangla, the map is in English only. This limits workers' ability to use the map.

On this basis, the evaluation finds that the project's communication and external learning was partly conducive overall.

For more information, [see "3.2.4 Communication and learning \(A4\)"](#)

Organisation and networking capacity (A5)

The evaluation finds that the technical staff, employed to design the database, collect and update the data, possessed the required capacity to do so.

However, there were inefficiencies and inconsistencies in CED-BracU's capacity and these included:



'Conditions that protect some of the people or the environment but have serious gaps'

- Limited capabilities to engage in the 'management' of external stakeholders, including PAC members and sector stakeholders in general
- Limited capabilities to develop and implement a clear communication strategy and motivate stakeholders to use data collected

Furthermore, insufficient management in the project's founding years placed the technical staff in a difficult situation, leaving them without the necessary political guidance and support within a highly politicised context. Based on this, the evaluation finds that CED-BracU's organisational capacity partly conducive.

For more information, [see "3.2.5 Organisation and network capacity \(A5\)"](#)

Recommendations

Based on these findings, the evaluation recommends the following:

Recommendation 1: Conduct a comprehensive stakeholder interest assessment, to determine the type of data that MiB can realistically provide, including the existing data, against information that could motivate different stakeholders (authorities, brands, factories, INGOs) to use the database systematically and thereby create a demand.

Recommendation 2: Reconsider the initiative’s vision and purpose, possibly with a much stronger emphasis on how traceability (as a first step on the ‘transparency ladder’) can contribute to further formalising the RMG industry, including 2nd and 3rd tier factories, and paving the way for other efforts (such as labour inspections or efforts to strengthen value chain responsibility) to strengthen transparency and accountability with in the sector.

Recommendation 3: Conduct a mini-census in the four districts with the most factories, to update the existing database data, remove data from factories that have closed and include data from newly opened factories.

Recommendation 4: Strengthen the project’s focus on relationship-building with external stakeholders and communication, and seek support from experts with insights into the sector.

Recommendation 5: Ensure that the members of PAC represent and inform other stakeholders within the sector about the MiB’s work and are genuinely interested in serving as ‘ambassadors’ for the MiB.

Recommendation 6: Prepare a publicity plan and invest in outreach to possible users of the collected and displayed data.

Recommendation 7: Explore the potential synergies and opportunities for cooperation with the Open Apparel Registry and other databases.

1. Introduction

The 2013 collapse of the Rana Plaza in Bangladesh was a turning point in global efforts to protect workers, and to ensure their fair working conditions, using transparency as a lever to improve accountability.

The collapse revealed the critical working conditions, which many workers in the ready-made garment industry were exposed to daily, and – sometimes – their detrimental consequences. The collapse also highlighted the fundamental challenges that were associated with the regulation and control of producers, within a sector where third, second and sometimes even first tier factories are hard to trace. Additionally, formal and informal production entities within the sector can be closely interlinked, making them difficult to oversee or even control.⁸

In the immediate aftermath of the Rana Plaza disaster global brands, retailers, INGOs and INGOs signed the Accord agreement, (or the Alliance, which is not legally binding) as a response. This agreement represents a first, major attempt to strengthen the sector’s transparency and accountability, via the public disclosure of key information.

It has six key components:

1. A legally binding agreement (Accord) between brands and trade unions to ensure a safe working environment within the Bangladeshi Ready Made garment Sector.⁹
2. An independent inspection program that involves workers and trade unions, and which is supported by brands.
3. Public disclosure of all factories’ inspection reports and corrective action plans (CAP).
4. A commitment from signatory brands to ensure sufficient funds are available for remediation and to maintain sourcing relationships.

⁸ 2021, The Rana Plaza accident and its aftermath: https://www.ilo.org/global/topics/geip/WCMS_614394/lang--en/index.htm

⁹ Bangladesh Accord Website

5. Democratically elected health and safety committees in all factories, to identify and act on health and safety risks.
6. Worker empowerment through an extensive training program, complaints mechanism and the right to refuse unsafe work.

Several other multistakeholder initiatives have been taken since the Rana Plaza collapse, which aim to use the public disclosure of information to strengthen the transparency and accountability of workers' basic rights within the garment sector. These include, but are not limited to, the Open Apparel Registry, a global database on RMG producers; the Fair Wear Foundation; the Fair Labour Association and the Ethical Trading Initiative.

In Bangladesh itself, the Department of Inspection for Factories and Establishments (DIFE), has a website that contains information about labour inspection. However, the information is rarely updated and therefore is not reliable, although current attempts to introduce a new management system, "LIMA", might improve the reliability and volume of accessible information.

Despite – or even perhaps because of – the strong focus on transparency – the Mapped in Bangladesh (MiB) initiative was created.

The sector's turnover is high, and factories tend to close, sometimes only to open under a new name.¹⁰ These factors have increased the challenge of producing or accessing comprehensive, credible and dynamic data archives for producers involved in the apparel supply chain, and of those producers' answering even basic questions about where they are located, who they produce for and how many workers they employ.

These deficiencies have nourished debate about, and misconceptions have arisen based on, the analysis of unauthenticated secondary information. Consequently, critical stakeholders have all drawn their own, separate conclusions about the actual number of RMG factories in Bangladesh. These stakeholders, include, but are not limited to, the Government of Bangladesh; exporter associations, such as the Bangladesh Garment Manufacturers and Exporters Association (BGMEA); the Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA) and international organisations, such as the Alliance and Accord.

Whereas export-oriented factories, with a direct relationship with buyers, are usually included in existing BGMEA/BKMEA membership databases, non-member factories are not. Smaller international clothing brands have found it impossible to verify each factory that produces their garments or under what conditions. Therefore, their consumers have not been able to verify the place of production. At the same time, authorities in Bangladesh did not have the resources or the required interest to develop or maintain up-to-date information about factories in the garment sector. This task is further complicated by the haste with which factories open and re-close.

Therefore, MiB is a response to a situation where supply chain disclosure has been inconsistent and difficult to track from one website or initiative to another, and where data is often locked away in non-machine-readable formats; such as, PDF or tables embedded in various websites. The non-standard formatting of basic information; such as, name and address data (coupled with the poor quality of this data), has often made it difficult and costly to analyse and make sense of the data being disclosed.¹¹ These were all challenges that the MiB aimed to address.

The initiative

Within this context, the Laudes Foundation (formerly the C&A Foundation) and the Embassy of the Kingdom of the Netherlands partnered with Brac University's Centre for Entrepreneurship Development (CED-BracU)

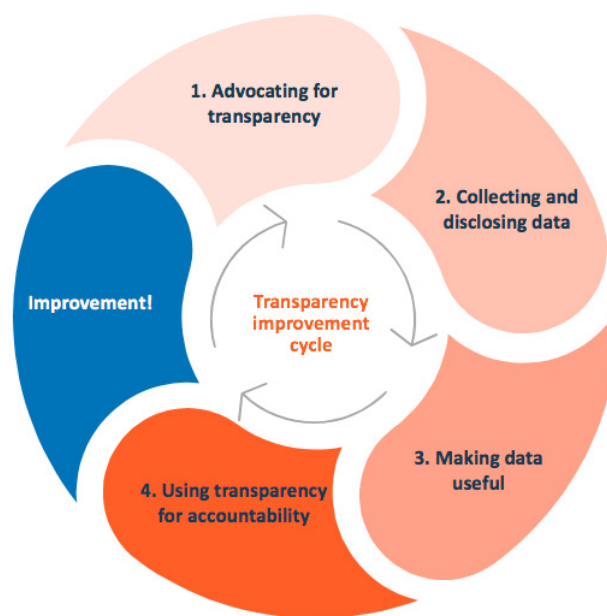
¹⁰ Bangladesh's Garment Industry Hit Rough Patch in 2019, <https://www.benarnews.org/english/news/bengali/garment-industry-12262019181327.html> and ILO research brief, October 2020: The supply chain ripple effect: How COVID-19 is affecting garment workers and factories in Asia and the Pacific*

¹¹ MiB Program document

on the Digital RMG Factory Mapping in Bangladesh initiative (called 'Mapped in Bangladesh' or 'MiB'). Its overarching goal was to *“provide industry stakeholders with real time, credible RMG factory data through an interactive online platform, enabling greater accountability and transparency in supply chains, and enhancing confidence in the ability of the sector to contribute to equitable development in Bangladesh”*.

The initiative was informed by the rationale that transparency – defined as the use of public disclosure to enable constituents to hold decision makers to account – will strengthen accountability and motivate improvement in the apparel industry. Consequently, the Laudes Foundation supports:

- a. Groups that advocate for disclosure about supply chains, conditions within factories and purchasing practices, as well as more inclusive, usable disclosure.
- b. Collection and disclosure of data that will not generally be self-disclosed by companies or governments.
- c. Initiatives that make data 'useful', defined as
 - Easily accessible: it does not require special knowledge or funding to access;
 - Named: linked to an identifiable entity (e.g., brand, factory, supplier or auditor, while protecting personal information such as identities of individual workers, or home addresses of producers);
 - Standardised: users can compare peers on a like-for-like basis;
 - Regularly updated: users can compare performance over time;
 - Detailed, with sufficient granularity to be able to challenge accuracy and take action
 - Comprehensive: it includes all or at least the majority of relevant entities;
 - Reusable: licensed, so that others have permission to take, combine, analyse and apply the data in other circumstances.
- d. Initiatives that implement tactics to leverage data for change. This could be coupling data with collective action and bargaining, using data in evidence-based negotiation, or using public rankings.



MiB was hosted and implemented by an independent university (Brac) with strong data collection capabilities. First and foremost, it responded to points 2) and 3) in the transparency cycle, outlined above. As such, the initiative was seen as an opportunity to provide data that were 'indisputable' because of Brac University's independence from any interest organisation and because of the credibility that it has earned through research-based data-collection practices.

At the same time, the initiative aimed to challenge the general practice in the sector that decisions are often based on sentiments and personal affiliations rather than data and evidence.

Finally, the initiative aimed – or hoped – to contribute to creating a demand for data in a sector that – given the Rana Plaza tragedy, had clearly demonstrated a need for data that could improve traceability and transparency within the garment sector.

In the shorter term, the MiB data-base aimed to promote data-driven decision making, by developing a concrete and comprehensive database of RMG factories. It would especially focus on gathering any currently unknown data from factories and would then leverage that data in diverse equitable development efforts with the sectors key stakeholders.

Thus, MiB's objective was first to provide industry stakeholders with accurate, credible and updated RMG factory information, about the location, size and production of factories. This was to be carried out in a manner that would enable greater efficiency, accountability and transparency, through a continuous updating of information based on crowdsourcing.

In the longer term, information would also be collected from the textile and associated industries. It was – and is – envisaged that stakeholders would use the mapped information as follows:¹²

Buyer level:

- Brands learn about any additional locations, where their products are produced, and help to improve working conditions in those factories, including indirect suppliers and subcontract factories
- Brands use the information about subcontracting factories to assess their compliance standards
- Brands use the map to inform their sourcing decisions

Worker level:

- Workers learn about factories' locations as well as which factories produce garments for more reputation-sensitive brands – which typically offer better working conditions
- Workers use the mapping and data from the transparency programs in negotiations and bargaining efforts

Sectoral level:

- National government implements new policies and demonstrates greater enforcement of existing laws and policies, once they are informed about or can confirm the existence of invisible factories
- Multinational brands are held accountable for the labour practices within their supply chains
- All actors compare and use the map data to ensure that the correct information is shown
- BracU could establish a research hub for organising further research into the industry
- ILO and Civil Society Organisations can focus their work on those areas with the highest density of factories

The initiative is a scaled-up version of an initial C&A Foundation-funded (now Laudes Foundation) pilot, which CED-BracU implemented between 2015 and 2016, and whose purpose was to assess the feasibility and relevance of country-wide mapping in the RMG industry. The feedback on the pilot phase, from trade unions and brands, indicated that the gathered information would help industry stakeholders to respond to unauthorised and illegal practices and/or manage risks by identifying unauthorised subcontract facilities.¹³

The project mapped RMG factories across all districts in Bangladesh (25 districts in total, which had export-oriented garment factories),¹⁴ including direct and indirect exporters. In addition to collecting factory names and locations, the map also features information; such as, number of workers, product type, export country, certifications and brand sourcing within the factory.

In order to strengthen ownership and to facilitate access to factories, the initiative partnered with the business organisations, Bangladesh Garment Manufacturers' Export Association (BGMEA) and Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA). The initiative also managed to bring the Department of Inspections for Factories and Establishments (DIFE) on board. The 'home grown' nature and participation of key, national stakeholders makes – or made – the initiative unique, as most former initiatives were initiated and implemented from 'the outside', with little ownership of and support from national stakeholders.

¹² Grant agreement, Reference no 5627

¹³ Funding document

¹⁴ These were divided into five cluster areas in the research – Cluster 1: Dhaka; Cluster 2: Gazipur; Cluster 3: Naranyanganj; Cluster 4: Chattogram; and Cluster 5: Mymensingh, Narsingdi, Cumilla and Others

Initiative Theory of Change

The project was motivated by a wish to unearth the universe of non-registered factories and to identify the brands associated with them. Therefore, it was informed by the rationale that if data about factories' locations, the composition of their work force, factory size and production is publicly available, then local and global stakeholders (including trade unions, brands and national authorities) will use that information to improve compliance with labour legislation and generally-recognised good working conditions, and will direct (brand) sourcing towards complying factories.

This is so, because information about where garments are manufactured will contribute to promoting data-driven decision-making and will redefine the responsibilities of the buyers/brands by giving them correct information about. This will let them react to poor working conditions and may contribute to the prevention of disasters, such as the Rana Plaza collapse.

Figure one, below, gives a graphical illustration of the initiative's ToC:

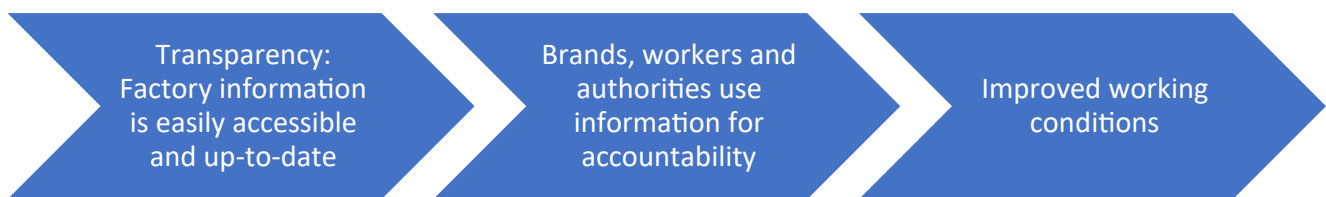


Figure 1 Intervention logic

The intervention's feasibility and effectiveness rests on the following assumptions:

- Factories are willing to share and validate the data requested by the initiative.
- Brands, trade unions, workers and factories are willing to update data (through crowdsourcing) according to changes.
- The disclosed data are relevant for stakeholders (brands, workers, trade unions, authorities and international organisations) and support accountability.
- Industry stakeholders are willing and able to use the data to work towards improved working conditions.
- The disclosed data are endorsed and considered valid by industry stakeholders.

2. Methodology

The evaluation team used a grounded theory approach to answer the questions raised in the Terms of Reference and to assess the initiative's contribution(s) to results and outcomes. Questions included, but were not limited to:

- Which changes – expected and unexpected – did the intervention contribute to and how? How valuable were these changes?
- To what extent is the identified change process a reflection of the original intervention logic/did the change happen in the way we thought it would?
- To what extent were assumptions viable?
- If (some) assumptions were not valid, what must change for the intervention to achieve its desired outcomes and objectives, and to be able to contribute to stronger accountability and decent working conditions within the garment sector?

The evaluation used a mixed method, convergent evaluation design to assess the anticipated link between data collection and disclosure within the MiB database and the anticipated changes in the industry stakeholders' use of data for stronger transparency and accountability. The convergent design was used to validate

findings using different sources of information.

Therefore, the evaluation included the following data-collection methodologies:

2.1. Quantitative data collection

User experience analysis: Google analytics

The evaluation team conducted an analysis of the user statistics that were made available by CED-BracU. The analysis' purpose was to assess the scope of traffic over time, the origin of users and the amount of time users spent on the site. These were all indicators of how, why and by whom data were used. Because the website's setup prevented the evaluation team from using bounce rates' and time spent as indicators of users' interest in and use of the site, the evaluation primarily reviewed that users' use of the search function and their interaction with it, as indication of their use. This is further explained in section Short-term outcomes.

Survey of subscribers to MiB's newsletter and the MIB site

The evaluation team distributed a survey to the 5131 subscribers to MiB's newsletter, which is published approximately eight-nine times a year, and which includes updates about the map. This was based on the assumption that readers of the newsletter would also be interested in and familiar with the map itself. The survey aimed to determine the respondent's use of the data and to what extent the data contributed to decision making which in turn would contribute to stronger accountability and improved working conditions.

2.2 Qualitative data collection

Semi-structured interviews with potential and actual users

The evaluation team conducted semi-structured interviews among MiB's users and potential users (see Annex II for a list of informants) to further substantiate and converge findings from the quantitative data collection. The qualitative interviews helped the evaluation team determine the map's relevance to users, how they did or did not use it, missed opportunities and what needed to be included to further strengthen its usefulness.

Semi-structured interviews with members of the Project Advisory Committee

As the MiB distinguishes itself from other databases by being 'home-grown' and by having producer and exporter organisations as strategic partners, the evaluation also conducted semi-structured interviews with members of the Project Advisory Committee (PAC). The aim was to understand the strengths and limitations of the PAC and to explore how this setup might have influenced perceptions and attitudes in the industry about disclosure and transparency. Informants included:

- a. The initiative's team leader and project manager
- b. BGMEA and/or BKMEA
- c. H&M (representing brands)
- d. CED-BracU representatives
- e. The Department of Inspection for Factories and Establishments (DIFE), the Ministry of Labour and Employment (representing the GoB)
- f. Sommilito Garments Sramik Federation (representing workers)
- g. The Center for Policy Dialogue (representing academia)

A total of 46 interviews were conducted. See Annex II List of Informants

Sampling of the informants was purposeful and informed by the principles of maximum variation.

Desk review

The evaluation team conducted a desk review of written materials, including program and progress report documents and research publications, as well as a mid-term assessment, conducted in 2020, and online

newsletters, webinars and YouTube videos published by MiB, since 2020.

2.3 Limitations of the methodology

The challenge of triangulation:

A direct triangulation of the quantitative and qualitative data turned out not to be possible. This was because the majority of the 46 informants interviewed directly stated that they did not use MiB. This, although they sympathised with the idea of an independent database and found that the availability of public information about factories in the garment sector in Bangladesh could help to strengthen transparency and traceability in the sector.

This infers that the interviews shed no light on how users, who actually use the MiB, are using it. In this case, the evaluation had to rely on quantitative data about how users interacted with the site.

Direct requests and emails from academicians to MiB suggested that users, who used the data for 'more than basic information about factories' location and the brands they produce for', did so mainly for research purposes.

Survey respondents of the recipients of MiB's newsletter:

Despite repeated attempts to gather responses to a survey, submitted to the readers of MiB's newsletter (5300 in total), the evaluation received only 16 responses, of which 70% identified themselves as factory owners. As the response rate was so low, the evaluation team decided not to draw any conclusions from the data gathered from this questionnaire. Therefore, data was mainly derived from the respondents of the qualitative interviews, suggested by BracU/MiB staff, from whom several did not use the MiB, and from UX data from MiB's website.

'Valuing the effects of basic research':

MiB represents a piece of 'basic research' that aims to create a foundation for other actors' understanding, interest, demand and use. Therefore, the process, from 'data production' to the data's contribution to shorter- and longer-term societal changes can neither be taken for granted, nor be assumed to be straightforward or short.

Therefore, it might be premature to measure the impact of 'basic research' against its ability – in four years – to contribute to building the right processes that create strong, stakeholder-informed policy reforms, or against their contribution to a situation where 'workers and producers voices are taken into account in decision-making' (section 2.4 Scales of Measurement/Rubrics). Additionally, this might also ignore the fact that an understanding of the data, an interest and a demand must be in place first. As this report describes, these are challenges that MiB is still struggling to address, within a sector that has no tradition for data-driven planning and decision-making.

Figure 2, below, illustrates how this situation relates to the intervention's initial Theory of Change:



Figure 2

2.4 Scales of Measurement/Rubrics

With these reservations in mind, the evaluation used the relevant aspects of the Laudes Foundation's evaluation rubrics system to assess the initiative's merit, worth and significance.

The rubrics system is a measurement and learning framework that assesses an intervention not 'just' against its short-term outcomes and the feasibility of the action's design but also against the longer term, systemic factors that affect decent working conditions for workers in the medium- to long-term.

The Laudes Foundation's evaluation rubrics are generic and not all ratings apply to all initiatives. For this evaluation, the team used the following rubrics as outlined in Table 1 below. The choice of rubrics was a joint decision between the Laudes Foundation, Brac-U and the evaluation team.

| Rating/Rubric | Why this is included |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A1. Design addresses the important issues and/or needs A2. Implementation is inclusive, enabling, empowering and capacity enhancing A3. Monitoring informs sound adaptive management A.4 Communication promotes internal and external collective learning A.5 Capability and capacity to deliver on outcomes | The focus is compulsory and relevant to all initiatives supported by the Laudes Foundation. |
| B1: Building the right processes to create strong, stakeholder-informed policy reforms B4: Workers and producers voices are taken into account in decision-making | The evaluation team proposes to include this category, as it aligns with the initiative's intention to strengthen the transparency of the presence and certification of garment producers. |

Table 1 Rubrics used for the evaluation

The evaluation did not include rubrics that measured the initiative's contribution towards later (2025) outcomes. This decision was because of the nature of the initiative and the fact that its main focus was on data collection and (partially) the distribution of knowledge about the data, as well as promoting understanding of how the data could be used.

Annex I to the inception report gives a description of the current baseline for the proposed rubrics B1 and B4, and criteria for the assessment of progress.

For each rubric, the evaluation used the following rating system, from the Laudes Foundation's Evaluation Rubrics System:

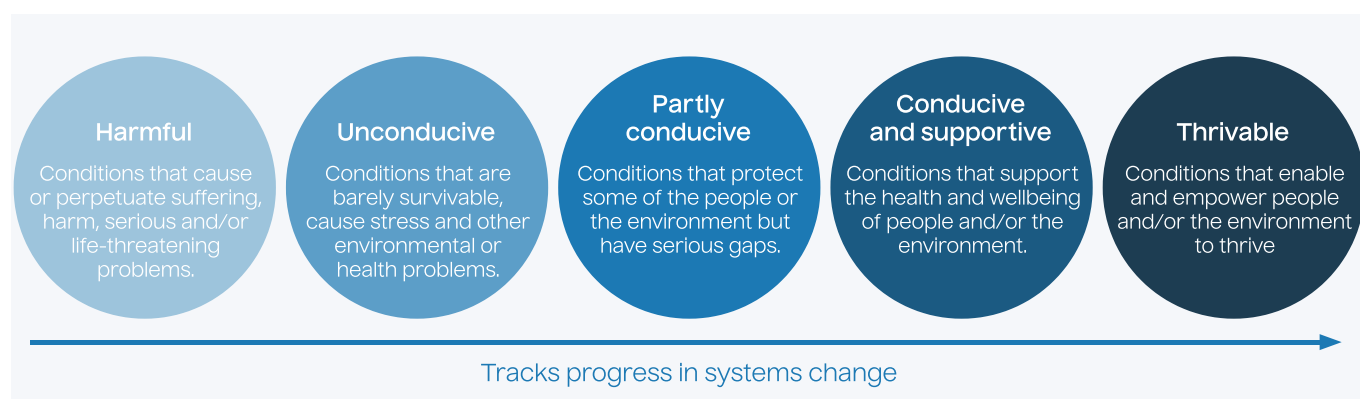


Figure 3 Evaluation ratings

3. Evaluation Findings

The MiB successfully managed to deliver the following planned outputs:

- Creating and rolling out procedures for data collection
- Creating software for data collection, validation/verification and publishing, owned by Brac-U itself.
- Publishing a list of brands, certifications and inspections – which was previously not accessible.
- Publishing ‘only’ active BGMEA and BKMEA member factories, along with 800 non-member exporting factories (as of December 2021).
- Establishing a cooperation with the Open Apparel Registry.

The evaluation also finds that data that was collected and displayed complies with many of the criteria for ‘useful data’ that are described in the Laudes Foundation’s transparency cycle. (see Annexes IV and V)

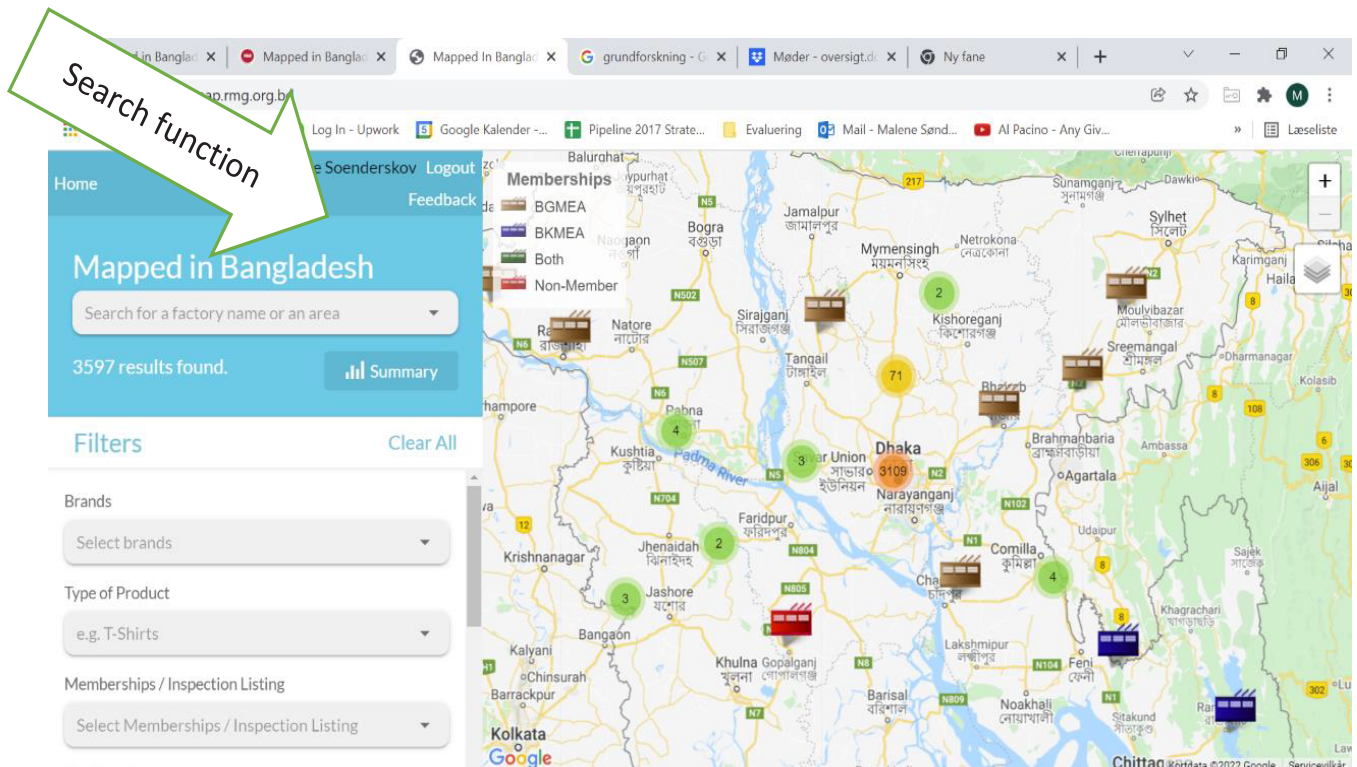
However, and as described below, these outputs have yet to contribute to any outcomes on a larger scale.

3.1 Short-term outcomes

Visitors to MiB’s website may interact with it in two ways. Firstly, they can use the search function, to the left of the screen (see Figure 4 overleaf) to search for factories, brands, type of products, memberships or certificates, after which they can search the factories that appear in the search results.

Secondly, they can click directly on the map (right-hand side of the screen in Figure 3) to find a factory. If they choose this option, users will be able to access factory-specific information about the factory’s location and contact details, production, certifications, memberships, number of workers, workers’ committees, and proximity to health and fire stations etc. (see Figure 4)

Figure 4



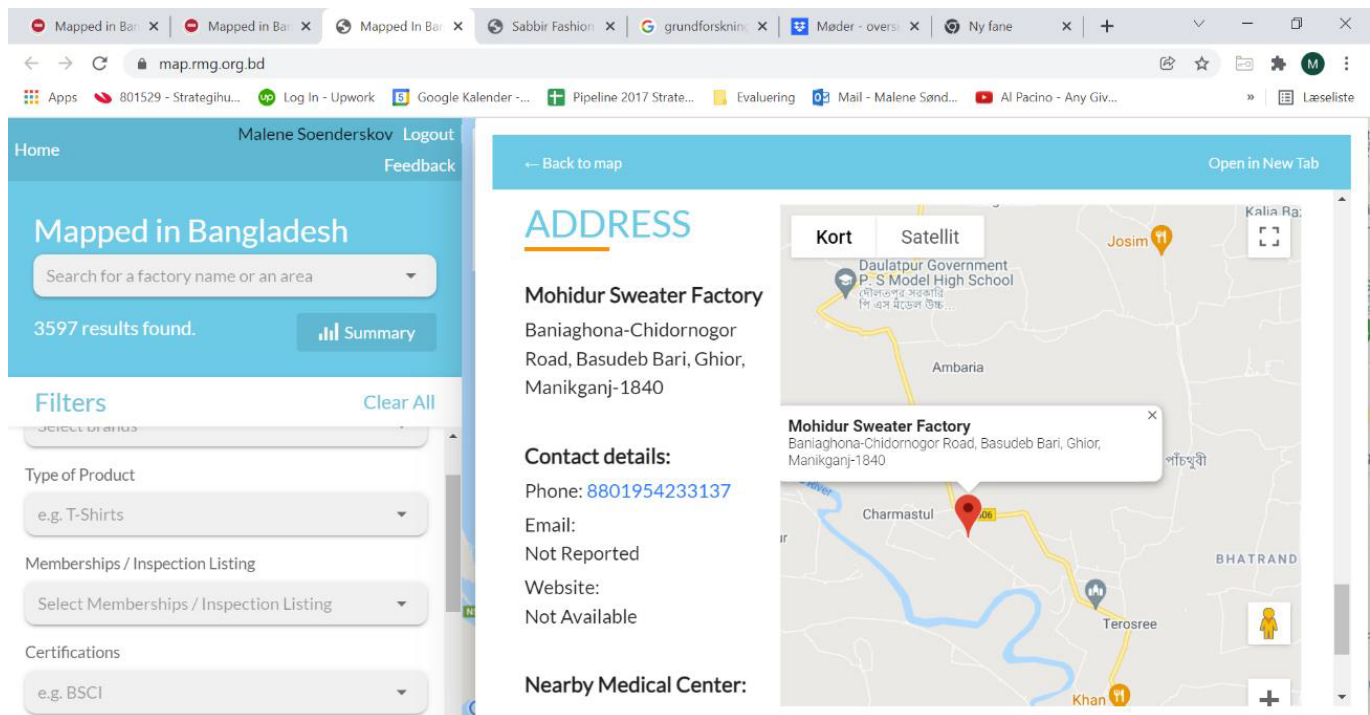


Figure 5

The website's setup did not permit the evaluation to use bounce rates or time spent per session as indicators of users' interest in the site, as the URL (the website address) does not change if users interact with the map directly. This means a visitor to the website can be highly active, or can leave the site immediately without any interaction, and without leaving any 'trace' that can be registered by the UX data collection tool.

Despite these limitations, the evaluation concludes that the MiB had approximately 52.000 visitors in 2021. Of these, 5.185 were returning users, which is an indication that they had a genuine interest in the site. 82,9 % of returning users originated from Bangladesh (see Table 1 for the top 10 returning users' locations) and made an average of five page views (a total of 25.191), of which 9.626 views were a result of the search function (Figure 4 above).

In 2021, returning users primarily employed the site to search for specific factories, as outlined in Table 2. 95% of all searches were made on specific, individual factories, either from MiB's website or from its Facebook link.

Visitors searched for combined variables in fewer than 1% of the searches. (For example, this could be factories in the Chittagong district that had certificate or were affiliated with the Accord; or the number of factories, producing for a specific brand, which has a certain number of workers).

The evaluation interprets this as a sign that the website is first used more as a 'directory'; to look to up and check the location or status of specific factories; and less as a source, to explore and answer broader questions, such as 'How many brands source in factories without a workers' committee' or certifications'.

| Country | Users | % Users |
|----------------|-------|---------|
| Bangladesh | 4.299 | 82,90 % |
| Cyprus | 117 | 2,26 % |
| Portugal | 115 | 2,22 % |
| Greece | 91 | 1,75 % |
| United States | 78 | 1,50% |
| Italy | 56 | 1,08 % |
| Spain | 36 | 0,69 % |
| United Kingdom | 29 | 0,56 % |
| Germany | 27 | 0,52 % |
| Lithuania | 25 | 0,48 % |

Table 1: Top ten returning users

Or: 'Which brands source in and around the Rana plaza area?'

These findings correspond with findings from the evaluations' qualitative interviews, where journalists and labour inspectors in Bangladesh reported using the website to search for specific factories location (labour inspectors) and basic information about specific factories that had experienced an accident (journalists). This information can be accessed either through a direct search, or – if the user knows the factory's location – simply by clicking on the map to the left side in figure 5 and match the 'search history' outlined in table 2.

Some new, export- oriented factories were reported also to use the map to promote the name and existence of their factory, but most factory representatives, trade union representatives and INGOs interviewed did not know about the map or did not use it. See Textbox 2, below, for an outline of who uses the MiB for what. Those who reported using the map found the data credible, although they were aware of the strong influence of exporters' associations on the map and the data displayed.

Overall, the number of search function users and the way users used the map suggest that the database is not contributing significantly, so far, to creating strong, stakeholder-informed policy reforms or to ensuring that producers and workers' voices are considered in decision-making; which are the two short-term outcome criteria against which the initiative is assessed.

| Search | % Searches |
|-------------------------------------------------------|------------|
| Specific factory search | 73 % |
| Specific factory search shared via link from Facebook | 22 % |
| Brand search | 0,2 % |
| Certificates and affiliation | 0,01 % |
| #Workers/factory | 0,01 % |
| Combined search | 0,01 % |

Table 2: Search frequency

Who uses the map and for what?

- **Trade unions and worker's solidarity organisations:** Of 13 trade union organisations interviewed, only one (the PAC member) knew about the initiative's status. One other trade union member reported attending the inception work shop, but had received no information since then. The PAC member used the map to find e-mail addresses of a company in case of a complaint. He had also once managed to use the MiB for documenting the real number of workers in a factory to prove towards DOLE that the factory union met the requirements on representativeness for registration this was however a one-off incident.
- **Labour inspectors:** Labour Inspectors were reported to use the map and its GPS coordinates to direct them to factories they planned to visit.
- **Business associations:** Business associations (BGMEA and BKMEA) did not report using the map.
- **Factories:** A few factories were reported to use the MiB to promote their factories.
- **Journalists:** Journalists interviewed reported using MiB for fast check-ups on basic information about factories that had had an accident.
- **Big Brands:** Big Brands (which are represented by H&M in the PAC) did not report using the MiB as they used their own sources of information to search for factories. Brands would like to see information on trade unions and CBAs, as existence of these is seen as positive sign of stability. All collected information should be published.
- **Small Brands:** Small brands and new brands on the market could possibly use the information to reach out to possible suppliers, but would need far more information about the factories' technical capacity, to make the data base relevant for buyers.
- **INGOs:** International NGOs interviewed by the evaluation team knew about the MiB but did not use it. Some visited the site after having received a meeting request from the evaluation team. International NGOs would like the map to include information about the operation of PC's, findings from inspection reports and factories' Corrective Action Plans. Of approximately 60 rights-based organisations working at national and international levels who the project manager corresponded with in 2020, 3 showed an interest in a cooperation according to the MiB Year four monitoring report, January to June 2020. The Ecotextile News showed interest to publish MiB's news/ updates in their July-August 2020 edition. The Garment Worker Diaries wanted to access MiB's workers' level data and the Business and Human Rights Resource Centre (BHRRC) preferred to use MiB who has more detailed data rather than OAR
- **Academics:** Some academics used the data for research and were in direct contact with Brac-U about the data. (See Annex III for a full list).

Findings based on interviews with key informants. See annex II

The website: Traceability or Accountability?

These findings suggest that the data displayed contributes firstly and more to strengthening factories' traceability; defined as the ability to find or follow something and less to 'transparency', defined as 'free from any attempt to hide something'.

A stronger contribution to ‘transparency’, would most likely necessitate that the work-related data, which is currently collected but not displayed on the map for political reasons, be released and included in the map.

This may raise a broader question about the website’s future use and audience.

If the website’s main purpose is to improve the traceability of production units in the RMG industry, and thereby contribute to the garment sector’s formalisation and authorisation, then the main users might be authority representatives, researchers, journalists and trade union representatives who can use these data for planning directly.

If, on the other hand, the website’s main purpose is to strengthen transparency and share information that can mobilise broader groups of stakeholders, including workers and INGOs, to participate in policy discussions, inform policy reforms or ensure that producers’ and workers voices are considered in decision-making directly, then the website must display decent work-related data that is currently collected but not displayed on the map. Alternatively, this information must be systematically distributed and discussed through other fora such as webinars and articles.

Organisations and individuals that directly requested MiB’s published data on the map in 2020

- Professor, UNSW Business School
- Ph.D., Simon Fraser University, Canada
- Open Apparel Registry (OAR)
- Apparel Data Directory
- MS in Supply Chain Engineering, ISyE, Georgia Institute of Technology
- Brac University & Duke Dev Lab.
- BGMEA
- Assistant Professor, UIU & PhD Fellow, Bangladesh University of Professionals
- Clean Clothes Campaign
- Graduate Student, Institute of Water and Flood Management (IWFM), BUET
- European Union (EU)
- Swiss Contact
- Professor, University of Aberdeen, UK
- Serai Ltd.

Source: MiB monitoring report January – December 2020

3.2.1 Building the right processes to create strong, stakeholder-informed policy reforms

As was the case in 2013, when the Accord was signed, the MIB was launched in 2017 with the ambition of gathering and uniting all industry stakeholders behind a joint initiative, to create and disclose basic, indisputable information about producers in the ready-made-garment sector in Bangladesh.

To this end, the initiative established a Project Advisory Committee consisting of representatives from the garment exporters’ association (the BGMEA and BKMEA), national authorities (DIFE), Trade Unions, international brands, international workers organisations, funders and the initiative itself.

As has been described in Sections 3.1 and 3.2, above, the PAC has not significantly strengthened stakeholders’ participation in discussions about data disclosure and their use beyond the PAC members themselves.

Poor management of the PAC and the dominant position of BGMEA in the committee might partly explain this situation, as already mentioned. However, divergent stakeholders’ expectations about the initiative are also likely to have contributed as explained in the section, below.

At the same time, the initiative has not made any of the changes that were expected as evidence for a situation, where the program would have contributed to build the right processes to create strong, stakeholder-informed policy reforms.¹⁵ These include:

¹⁵ See Annex I for an outline of expected indicators

- Brands that were to use the information to inform sourcing decisions.
- Workers, (including female workers) who would use the mapping and data from transparency programs in negotiations and bargaining efforts.
- National government that would use the data for policy development.
- ILO and CSOs that could thus focus their work on areas with the highest density of factories.

Recent developments indicate that the national, ILO, EU and other international actors might use the data in the future, but so far this is not the case, as described above.

Divergent expectations and understandings of what transparency is

The terminology ‘transparency’ is commonly used in a figurative way to refer to a state wherein things are free from any attempt to hide something. The definition used by the Laudes Foundation is strictly related to public disclosure. In 2017, BRAC, the Ethical Trading Initiative and Laudes Foundation (formerly C&A Foundation) brought together 64 participants in Chittagong to consider the challenges to and opportunities for transparency. At the event, transparency was defined as the “the public disclosure of data which enables constituents to hold decision-makers to account.”¹⁶

However, a research report, released by the Laudes Foundation in 2020, pointed out that transparency does not always mean the same thing to industry stakeholders in Bangladesh. Neither do stakeholders share a common understanding of how transparency is enforced nor an equal capacity to enforce it.¹⁷

The majority of the 87 manufacturers, surveyed in the Laudes report, understood transparency to be the public disclosure of information about labour issues, working conditions and safety-related compliance. In many cases they did not distinguish between public and limited disclosure and perceived the sharing of information privately with supply chain partners as an act of transparency.

This perception was confirmed by the factory informants interviewed for this evaluation.¹⁸ They mainly understood transparency as the disclosure of information to auditors (for certification) and to the DIFE or BGMEA/BKMEA. Factory informants interviewed considered wage-related information to be very sensitive and opposed public disclosure. They believed the “Business Social Compliance Initiative (BSCI)” certificate was a sufficient guarantee that a factory was complying with the minimum wage etc. Compliance with these regulations is also mandated by law. However, the factories interviewed did suggest disclosing whether factories possessed a BSCI certificate.

The factory representatives’ position on the disclosure of wage information contradicted the position of the workers. Most workers, in the Laudes Foundation’s 2020 study, thought that transparency simply meant timely and reliable information about their wages. Some believed transparency was also related to information on order volume, product destination and brand names.

Conversely, the representatives from workers’ organisations associated transparency with publicly accessible, factory-specific information about worker rights, trade union affiliation and hiring and retention practices.¹⁹ This was confirmed by the evaluation team’s interviews with trade union representatives too.²⁰

16 Transparency Assessment: Examining the transparency journey for the Bangladesh apparel sector. Study commissioned by Laudes Foundation Authors: Doug Cahn and Nazneen Ahmed, 2020

17 Transparency Assessment: Examining the transparency journey for the Bangladesh apparel sector. Study commissioned by Laudes Foundation Authors: Doug Cahn and Nazneen Ahmed, 2020

18 Interviews with factory representatives undertaken by the evaluation team between 21 and 25 December 2021 – see annex II

19 Ibid

20 Interviews/focus groups with trade union representatives. See annex

Brands generally believed that a certain level of transparency already existed between them and the manufacturers. Brands further expressed that if factory managers and workers could maintain good communication and negotiation systems, third-party monitoring and corrective measures would no longer be required. Given these diverging perceptions of what transparency is and its purpose and prevalence, it is logic that the different industry stakeholders reacted differently to the map: some with indifference or polite interest – as they believe transparency already exists – and others with disappointment, as they believed the map was not transparent enough.

The Initiative's Vision

Unclear communication about the initiative's vision, as well as how and why the MiB contributes to transparency and traceability, could have affected the limited buy-in from stakeholders and the initiative's ability to inform policy making.

The information disclosed on the map is mainly linked to factories' traceability (geographical location, phone and other contact details) as explained above, or provides answers to closed-ended questions about whether a factory has registered for certain certification schemes or if it is a member of BGMEA, BKMEA, the Accord or the Alliance. Qualitative information about how well a factory performs or complies is not collected or disclosed.

This made the project ill-equipped to deliver against the broader transparency goals and purposes that were listed in the original project document. As mentioned earlier, these included:

Buyer level:

- Brands would learn about any additional locations, where their products are produced, and help to improve working conditions in those factories, including indirect suppliers and subcontracting factories
- Brands would use the information about subcontracting factories to assess their compliance standards
- Brands would use the map to inform their sourcing decisions

Worker level:

- Workers would learn about factories' locations as well as which factories produce garments for more reputation-sensitive brands – which typically offer better working conditions
- Workers would use the mapping and data from the transparency programs in negotiations and bargaining efforts

Sectoral level:

- The national government would implement new policies and demonstrates greater enforcement of existing laws and policies, once they are informed about or can confirm the existence of invisible factories
- Multinational brands would be held accountable for the labour practices within their supply chains
- All actors would compare and use the map data to ensure that the correct information is shown
- BracU could establish a research hub for organising further research into the industry
- ILO and SCOs could focus their work on those areas with the highest density of factories

Rating

Based on the above findings, the evaluation concludes that the initiative's contribution to building the right processes, to create strong, stakeholder-informed policy reforms is uncondusive.

The data's contributions to traceability are indisputably a precondition for a further formalisation of the garment sector and a precondition to addressing the broader overall issues of transparency. Despite this, the evaluation finds that the initiative's limited inability to address stakeholders' different perceptions and

expectations about what transparency is and why it is important, has hampered its ability to change stakeholders' mindset towards more transparency and public disclosure.

While there are early signs of stakeholders' recommendations finding their way into policymaker discussions and agendas – the brands' practices to disclose the names of factories/suppliers is proof of this – these are generally less impactful recommendations that do not contribute to the more foundational changes needed. The situation has therefore not changed significantly since the initiative's start (see annex I).

Stakeholders' limited buy-in and participation, caused by BGMEA's domination of the PAC and the different stakeholders' expectations and perceptions of 'transparency and its purpose' further reduce the significance of the initiative. (Unconclusive.)

3.2.2 Workers and producers' voices are considered in decision-making

Therefore, the evaluation does not find that the initiative has changed the way workers and producers' voices are considered, in decision making.

First, this is because the MiB collects and displays data that – in isolation – is well-suited to confirming the existence of production units, factories' membership of the Accord/the Alliance and their ISO certifications, but less well-suited to determining how well factories comply or what it would take to strengthening compliance. While the latter was not meant to be the scope of the project, the evaluation is concerned that this might be a precondition for a situation where workers can or will use the data to raise their voice – provided that they have the capabilities to do so.

Second, the power dynamics inside the PAC and the diverging expectations of the initiative among its members and stakeholders, have led to a situation where workers are de facto excluded or self-excluding as they find the data collected and displayed irrelevant to their needs and/or as they lack the capacity to use it. The fact that the data is displayed in English only also contributes to further marginalising workers voices from the initiative.

Third, most decision-makers and stakeholders are still unaware of the map and how the data might be used. Most informants, interviewed by the evaluation team and including representatives from producers, had not heard about the map or been introduced to it during the inception phase, which was several years ago. Limited interest was also found among other stakeholders, including brands and national authorities.

Finally, the initiative has not made any of the changes that were expected as evidence for a situation, where the program would have contributed to a workers and producers' voices being considered in decision making.²¹ These include an increased in use of the map by different actors (listed above) for making informed decisions on the RMG sector in Bangladesh.

As explained above, the map is used by some labour inspectors and journalists to verify the location and basic status of individual factories. The evaluation did not find evidence that the map is used by workers and the fact that the map is in English reduce the likelihood that workers will use it in larger scale. Anecdotal information suggests that some producers use the map for branding, but this seems so far not to take place in a larger scale

Rating

Based on the above findings, the evaluation concludes that the initiative has not affected the power and influence of civil society organisations, movements or networks representing workers, or that of producers. The

²¹ See Annex I for an outline of expected indicators

data is mainly used by journalists to verify basic data about factories that have had an accident and by factory inspectors to identify the location and contact details of factories. Trade unions express limited interest in and understanding of why and how the initiative will be relevant to them under the current circumstances and are still restricted in their operations by producers and the authorities.

Consequently, decisions and actions that affect workers, producers and communities are taken with complete disregard for those affected and often exacerbate the status quo; e.g., continue the exploitation of workers, producers and their communities and/or harm natural environments for the purpose of short-term profit maximisation.

Thus, while the initiative represents some well-intentioned efforts to respond to the (indisputable) needs of the sector at large, it has not been able to promote a situation where policy makers and other stakeholders systematically incorporate the expertise of sector stakeholders in determining, enacting and/or monitoring changes in policies and practices. (Unconductive)

3.2 Process

The MiB initiative was implemented by BRAC University's Centre for Entrepreneurship Development (CED), with Laudes Foundation as the lead funder. Additional co-funding was provided by the Government of the Kingdom of Netherlands.

The initiative was a response to a situation where supply chain disclosure has been inconsistent, difficult to track from one website or initiative to another, and where data is often locked away in non-machine-readable formats, such as PDF, or tables embedded in various websites. The non-standard formatting of basic information; such as, name and address data (coupled with the poor quality of this data), has often made it difficult and costly, to analyse and make sense of the data being disclosed.²² Although the initiative was a relevant response to this situation, design and implementation did have limitations as described below.

3.2.1 Design (A1)

Rationale

The prevalence, size and production of garment factories in Bangladesh is difficult to keep track of. Factories open and close, and reopen under new names. Therefore, discussions about their numbers and the workers they employ are inconclusive.

MiB was informed by a general intent to establish a map of all RMG factories in Bangladesh that would include factories' location, the exact number of workers (male and female) employed in the industry and the brands sourcing from these factories.

As collecting and updating/maintaining credible data – even with these few parameters – has proven to be a huge task for other organisations operating in the field, the design and data-collection strategy was informed by a pilot project, “Participatory Factory Mapping Research: Planning Phase”, funded by the C&A Foundation and coordinated by BRAC USA. The pilot was implemented in two sub-regions, Mirpur (Dhaka district) and Kaliakair (Gazipur district), during 2015—2017 and showed that credible data could be collected using a census methodology.

The pilot phase provided useful information about how data could be collected, but did not include assessments of data demands, the capabilities of various stakeholders to use the data availed to them, or of the

perceptions and expectations regarding data that contributes to traceability and transparency.²³

The pilot project showed that access to the factories, from where data were to be collected, depended on the cooperation of the DIFE, BGMEA and BKMEA. Therefore, CED-BracU signed a MoU with BGMEA at the beginning of the project to ensure access and, later, also signed a MoU with BKMEA.

The MoU stressed the goodwill and interest of both parties to cooperate,²⁴ and provided a framework for the collection of the following data:

- Factory name/address/GPS location
- Operational status of factories (active/inactive/shut down, etc.)
- Registration status (member of BGMEA, BKMEA/Export Promotion Bureau, etc.)
- Type of production
- Type of factory building structure
- Number of workers
- Zone/countries where products are exported
- Major buyers/brands working with the factory
- Distance of the nearest hospitals and fire service stations
- Workers participatory committee, safety committee, etc.
- Affiliation with and information on having trade unions (will be collected but not published on the map)
- Certifications (Accord, NAP, Alliance, etc.)

Although the MoU provided an 'entry point', and offered an occasion for MiB staff to contact factories, field enumerators still had to build relationship and in many cases after multiple attempts, they got access to the factories and completed the survey guiding the data collection.

Content and focus

Initially, the project intended to map all textile and garment factories in Bangladesh, to establish a full – or at least a comprehensive – overview of the whole industry and its supply chain, using a census approach (Complete Enumeration Survey Method). Therefore, the territorial outreach of the census was huge: covering 25 districts. 3,485 factories were concentrated in only four regions (Dhaka, Gazipur, Narayanganj and Chattogram).

Faced with the enormous task of identifying factories of various sizes (from small sweatshops with very few workers to huge factories with thousands of employees), and against BGMEA's resistance to collecting data from subcontracting factories (2nd and 3rd tier factories), the project made the following decisions – after lengthy discussions – regarding the content and focus of the map:

- First: First tier factories producing the final garment were to be included. Second, and third tier factories supplying 1st tier factories – e.g., those including spinning mills, printing and packaging factories – were not included.
- Second: Factories with + 80% foreign exports were included. RMG Factories in export processing zones (EPZs) were not included, as BEPZA was unwilling to cooperate with MiB. BEPZA has recently indicated that it might change its position. However, BGMEA's member factories in the EPZ's could be included, together with any sub-contractor factories affiliated to BGMEA.

The design's strengths and limitations

The evaluation finds that the initial idea, to use a census approach, was well-placed as it offered an opportunity

²³ The Laudes Foundation commissioned and published a report on this in 2020: Transparency Assessment: Examining the transparency journey for the Bangladesh apparel sector.

²⁴ MoU between CED BracU and BGMEA, 2016

to capture all factories in the industry, to strengthen the credibility of the data set and to create a unique sample of primary data. This sample differed from that from other registries, and had a stronger credibility and trust worthiness as it was collected by an independent university with a strong reputation.

Furthermore, the insistence on the database's being 'home grown' and – potentially – owned by all sector stakeholders, represented in a joint PAC, was an opportunity to offer a combined Bangladeshi response to a general call within the garment sector (sparked by the Rana Plaza tragedy) for stronger traceability and transparency in general.

The design's strengths, including the support from business associations has enabled the MiB to:

- Publish a list of brands, certifications and inspections – which was previously not accessible.
- Publish 'only' active BGMEA and BKMEA member factories, along with 800 non-member, exporting factories (as of December 2021).
- Establish a cooperation with the Open Apparel Registry.
- Create a software for data collection, validation/verification and publishing owned by Brac-U itself²⁵.

However, although these were – and are – undisputable achievements and strengths, the design – and the context in which the initiative was implemented – revealed some inherent dilemmas and challenges, some of which are linked to data collection in the ready-made garment sector in general:

- 1. Timing.** Data collection took much longer than anticipated when using the census model. This was partly because of the size of the sample, and partly because of factors outside the project's direct influence. These included difficulties in obtaining permission to collect data from the eligible factories (according to the sampling strategy), the need to build trust with factories before data was collected and enumerators could access the factory sites, and challenges associated with data verification. Data collection was also delayed by Covid-19 and the lockdown, which resulted in a situation where MiB field work and data-collection activities had to be paused in the cluster 5 districts.

These difficulties of data collection were further aggravated by the original design's lack of a clear definition as to what constituted "a factory". This created some discussion among stakeholders (members of the PAC) who spent a long time agreeing on a feasible definition.

Consequently, CED-BracU took more than three years (2018—2021) to collect data for the sample and the dynamics of factories' opening and closing over these three years were therefor not fully reflected within the sample.

- 2. Determining a strategy for data updating.** The strategy and procedures for data updating was only agreed upon towards the very end of the project, and after it became apparent that factories and workers were not motivated to use the map's 'Suggest and Edit' function. In response the MiB decided to base data updates on crowdsourcing.

The crowdsourcing strategy is based on a points-system, wherein the factory representatives who are updating the factory-related information, earn points which can be exchanged for money after they have updated the data in the app (1.000 points are equal to 150 Tk). At the time of the evaluation, there were 214 informants (nominated by factory management) in two regions, who were updating their factories' data regularly to the map.

As the crowd-sourcing app is designed to update data in operating factories/factories that the MiB has established a contact with, it remains an open question if the crowd-sourcing strategy will allow MiB to collect data from a) factories that have closed and b) newly opened factories where MiB has not established a contact with any representatives who can provide data yet.

This coming year will determine whether the crowdsourcing strategy is a feasible and effective way forward, as well as whether the approach can contribute to an effective and smooth updating and verification of data. This is a precondition of the future credibility and trustworthiness of the data set.

- 3. Exclusion of 2nd and 3rd tier factories.** Although the evaluation team appreciates and understands that political pressure and concern from the partnering business associations (and resources) prevents the project from mapping all factories, the focus on Tier 1 factories with + 80 percent export is likely to reduce the MiB's added value and potential contribution to revealing the 'invisible' factories, working without authorisation in the garment industry. Firstly, because international brands source directly from Tier 1 factories, which means they are likely to have a higher level of compliance with decent basic work standards than the rest of the industry. Secondly, because many (although far from all) Tier 1 factories are already included in other registries, whereas less attention has been paid to the Tier 2 and 3 factories.
- 4. Late attention to data use.** Although much time and many resources have been invested into data collection and display, and in 2021 data updating through crowdsourcing, the original design does not define the target users and purpose except for in vague terms. It is also almost silent concerning the communication and promotion of data use. Furthermore, the initiative only launched a newsletter, which allows the MiB to communicate with potential users, in 2020. This was further aggravated by the exclusion of a Bangla language website from the map's design, as this limits workers and worker unions' interest in the data that is displayed via the map.

This concern was discussed among stakeholders in the PAC, but no action was taken to address it. The late attention to data use has affected the project's ability to address and work towards the shorter-term outcomes that the initiative is evaluated against.

Rating

Based on the above, the evaluation finds that although the initiative was good enough to receive funding initially, and although it was in line with Laudes Foundation's vision, and that the initiative achieved some significant results in terms of delivering 'useful data' as defined in the Laudes Foundation's transparency cycle (see annex V for an assessment of the initiative's performance against the criteria for 'useful data'), the design was not well-suited to addressing some of the unanticipated challenges linked to data collection, data updating and communication that surfaced during the period of implementation. The fact that second- and third-tier factories had to be excluded from the sample also represents an unfortunate missed opportunity. The evaluation recognises that the initiative worked to address some of these challenges, and the coming year will show how and to what extent these efforts are successful. However, at the time of writing, the evaluation team finds that this is assessment equals 'Unconductive' according to the Laudes Foundation's evaluation rubrics.

3.2.2 Implementation (A2)

Management

The evaluation finds that the program's implementation of the phase, following the inception period, was challenged by shifts as well as insufficient management commitment and insight into the garment sector; most notably, during the initiative's first, formative years from 2018. This included the fact that two project managers were replaced within the grant period and that the grant holder shifted from BRAC- US to BRAC-Bangladesh.

This directly contrasts with the thoroughness, professionalism, cultural appropriateness, and consistency that has characterised MiB's technical staff's ability to collect, analyse and quality assure the data that they collected, their work with the database and their efforts to overcome and find solutions to challenges, during

the course of the project's implementation.

The insufficient project management, in the project's first and founding years, was a challenge, for the intervention's technical staff – and not only them. They had limited support for their work, which was implemented in a highly politicised sector, where data collection was highly sensitive and where some staff members were threatened, simply because they were collecting data and visiting factories.

Insufficient management also contributed a weak project outreach and may have reduced the functionality of the PAC, which was characterised by stalled and repetitive discussions and – over time – the limited participation of some members (see below).²⁶

CED-BracU had not implemented a project of this character and scale before, in the garment sector. Consequently, its staff were not prepared for a situation where they had to spend substantial time and efforts in building trust with the stakeholders. They were also tasked with convincing them to contribute to traceability and transparency and communicating how their participation could benefit them, as well as how they could use the collected and displayed data.

It also took a long time to get the key stakeholders, such as the Department of Inspection of Factory and Establishment (DIFE), and the main business associations (BGMEA and BKMEA), to buy in to the project and to provide the necessary recommendations/introductions for the project to collect data in BGMEA's member factories.

For the same reasons, MiB did not manage to engage brands, to a greater extent, in the development of the map. The evaluation finds, based on stakeholder interviews, that brands – with some exceptions – followed the project from the side-lines, and participated in meetings when invited but with no strong engagement or indication of ownership.

Project Advisory Committee

A Project Advisory Committee, consisting of representatives from the project management team and representatives from industry stakeholders and funders,²⁷ was established to provide input and insights to the MiB Team throughout the project's lifetime. The terms of reference²⁸ for the PAC included but were not limited to:

- Providing strategic advice and recommendations in relation to the project, especially in terms of mitigating challenges and obstacles.
- Facilitating the development of collaborative working relationships with all stakeholder groups including, but not limited to, the government, international donor agencies, international brands, the media, and various civil society organisations, etc.
- Ensuring that the project team was informed of trends, issues, and events that may impact the project – either positively or negatively in a timely manner, and if needed, advocate for the project's implementation and completion, whilst identifying future options for sustainability and growth.

The PAC was meant to be composed of representatives from the sector's stakeholders. However, some of the representatives were only partly representative of their particular stakeholder group and they showed little commitment to informing other members of their stakeholder group about MiB's work or to facilitating the

²⁶ Desk review of meeting minutes

²⁷ In the PD, membership of the PAC was foreseen to include: 1. The project team Leader (Chair) 2. Project Manager (Member Secretary) 3. C&A Foundation Representative(s) 4. Gender Specialist 5. Civil Society Leader(s) 6. BGMEA / BKMEA Board Representative(s) 7. Brand Representative(s) 8. Government Representative from Department of Inspection for Factories and Establishments 9. Academic / Researcher 10. Brand / Co-Financing Partner Representative 11. Alliance / Accord Representative(s) 12. Co-Funder/s Representative(s)

²⁸ Terms of Reference for Project Advisory Committee (PAC) of Digital RMG Factory Mapping in Bangladesh (DRFM-B)

development of collaborative working relationships with other, like-minded stakeholders. As an example, of the 12 trade union representatives interviewed, only one (the PAC member) knew about the MiB, which could indicate that the TU representative had done little to share information or had done so insufficiently.

The PAC met approximately once every eight months. There was regular attendance from BracU, funders, BGMEA/BKMEA (BKMEA joined full scale after 1.5 years), and the Center for Policy Dialogue. Representatives from brands (H&M) and Somnilito Garments Sramik Federation (trade union) and the Department of Inspection of Factory and Establishment (DIFE) participated in meetings also, although more sporadically.

Despite the MiB management's efforts to convince stakeholders to participate actively in the PAC's meetings, the interviewed informants reported that meetings became more informal over time, followed by a loss of stakeholder ownership and commitment. Inconclusive and repeated discussions on the sample could have reduced some PAC members' motivation, as expressed by them and as reported in an MiB progress report from 2018. In particular, discussions evolved around the following issues:

A. Collection and publication of data: PAC members had lengthy discussions about the type of data to be collected and published. Consensus was difficult to reach on anything but basic data about location and membership. While social data has been collected in more recent years, there is still no consensus about the publication of these data.

B. Definition of 'a factory' and, thence, those to be included in the mapping: MiB considers factories are export-oriented RMG factories only, i.e. those which export at least 80% of their production. However, BracU estimates that if factories that export 40% of their production were considered, 18-20% more factories could be added to the list, including an additional 13-15% workers. Although BGMEA accepted this definition, with hesitation only and would have liked to have been less inclusive, the rest of the PAC members agreed that the exclusion of non-associated members would greatly diminish the worth of the project's deliverables.²⁹

The evaluation team notes that those factories not registered by MiB – including 2nd and 3rd tier factories (and that are suppliers to 1st tier factories which are included in MiB) are generally recognised to have a higher level and prevalence of non-compliance to basic security provisions and workers' rights.

The omission of second- and third-tier factories³⁰ meant that the initiative could not introduce the concept of 'supply chain responsibility' to the many first-tier factories that are already covered by existing initiatives such as the Accord, the Alliance and the IBSC, as well as their suppliers in the value chain. Unlike the Accord and Alliance, MiB did not have brands backing them when issues rose over factory inclusion, however.

This omission meant that the project's implementation diverged significantly from its initial idea, which was to develop "a concrete and comprehensive database of the RMG factories, focusing especially on gathering currently unknown data from Ties 2 and Tier 3 factories".³¹

Software development

The chosen software developer's inability to develop the map also adversely affected project implementation. After six months of work and substantial delays, the contractor – a US-based company – was asked to stop its work and the MiB team had to develop the site from scratch themselves, and under extreme time pressure

29 MiB Year 2 progress report submitted to the Laudes

30 This evaluation defines Tier 1 factories as factories exporting directly to brands. 2nd tier factories are factories where Tier 1 factories get their materials or semi-finished products. Tier 3 factories are factories who typically work in raw materials

31 the project proposal (Grant Agreement – Ref. No. 5627, p.33).

The project's initial, external software developers lacked sectoral insight and faced challenges accommodating, for example the many different certifications that factories might have. Therefore, the MiB project team was challenged, both when it came to technical issues linked to the software development and when addressing the sensitive social and political issues that characterised the sector and affected the project. The decision to leave the software development to MiB was a significant limitation to the project's implementation, which caused substantial delays, however it also saved significant costs and is proof of the project team's dedication when it came to finding solutions to problems as they materialised.

Rating

Based on the above, the evaluation finds the project's implementation was uncondusive (moving towards partly condusive) overall. Insufficient external management hampered the project's ability to address external and political pressure, to support the MiB's technical staff, to impact the internal dynamics of the Project Advisory Committee positively, to strengthen the consensus and ownership of the initiative among members of the PAC, and to reach out to other sector stakeholders. This affected the project's efficiency adversely and de facto contributed to marginalizing some, for example trade unions, from discussions in the PAC. Although these limitations affected the project's effectiveness adversely, they were not detrimental to organisations' participating in the initiative.

3.2.3 Monitoring and adaptive management (A3)

The evaluation finds that the project's staff applied a consistent adaptive management approach throughout the project's implementation. However, adaptations were not sufficient to compensate for or alleviate limitations in the project's design and implementation.

Initially, the MiB aimed to collect and disclose basic data about factories' location, compliance schemes and numbers of workers. As already described, resistance from PAC members, BGMEA and BKMEA, was consistent. Given this situation, the MiB strategy, throughout, was to continue to push the limits and definitions of which factories to include and what data to publicise on the website. This strategy partly paid off, as representatives from the business associations within PAC changed their minds – after a long discussion – and agreed to include factories with a minimum of 80% export production instead of including factories that were entirely export-oriented only.

The strategy of 'pushing the limits' was also used in relation to the content and focus of data collection. Initially, MiB used a three-point questionnaire, covering very basic information, for the census. This was later changed to a 12-point questionnaire that was in line with the MoU signed with BGMEA/BKMEA. During the COVID-19 pandemic a far more extensive questionnaire was developed that covered a wider range of social and worker-related issues; however, these were not all disclosed.

The principles of adaptive management were also applied to the project staff's responses to the challenges they encountered during the project's implementation. This is exemplified by the staff's ability to develop the software that supported the mapping, the American contractor was unable to deliver, as well as a revised data-collection protocol during the Covid-19 pandemic (mentioned above). Staff also introduced a newsletter, after the project realised that more had to be done to strengthen national and international outreach. Challenges were discussed openly with the Laudes Foundation and EKN, throughout the project's implementation and also shared verbally and in written progress reports.

Rating

As such, the evaluation finds the initiative's monitoring and adaptive management partly condusive overall. The initiative was monitored in a way that enabled adjustments and timely responses to technical issues and challenges and used real-time adaptive management to adjust project activities, according to findings and lessons learned. This was backed up by regular, easy-to-read reports to donors.

3.2.4 Communication and learning (A4)

There was a limited prioritisation of communication and outreach in the first few years of the project, which affected the intervention's communication with external stakeholders and reduced the opportunity to turn data needs into a genuine demand. BracU tried to compensate for this in the project's second half, through social and online media, after the Covid-19 pandemic reduced the opportunities to meet with stakeholders physically. However, none of the BracU staff's job descriptions was fully dedicated to external communication. The task was undertaken by team members, amidst multiple other responsibilities.

Inception workshops were organised during May-October 2017, with representatives from BGMEA, BKMEA, DIFE, brand/buyer, mid-level RMG professionals, labour rights-based organisations, factory owners, etc., to address expectations and present the project's purpose to stakeholders before the map was launched.

Other stakeholders (INGOs and workers' rights-based organisations/associations) participated in experience sharing sessions in July 2019, and RGM entrepreneurs convened in October 2019. The objective of these sessions was to receive feedback from the stakeholders about their experience with the digital map (www.mappedinbangladesh.org) and to elicit their suggestions to improve it further.

The evaluation notes that the inception and experience-sharing meetings were held with different groups of stakeholders, separately. Furthermore, messages about the MiB's current and future content, purpose and contribution to transparency were communicated differently to different stakeholders. This can be explained and legitimised by the need to speak to each target group's mental universe, concerns and interest.³² However, it is also likely to have contributed to further confirming the differences in the stakeholders' expectations about and perceptions of the MiB and the value of traceability and transparency. See also section 3.2.1 Building the right processes to create strong, stakeholder-informed policy reforms

Despite these efforts, most Bangladeshi stakeholders who were interviewed by the evaluation team had no or very limited knowledge of the project, if they had not been directly involved with the PAC. Some informants, who had participated in inception workshops and other meetings, said they had not received any information about the project since that time, and they were not aware that the map had been launched or that data were accessible.

However, most informants reacted positively towards the idea of the MiB, after the evaluation team introduced them to the site. Although a few stakeholders use the data, the evaluation finds that those who do, perceive the information as reliable.

BracU – creation or marketing of data?

The evaluation finds that the idea of 'data marketing' and outreach was new and perhaps even alienating to some MiB staff members, who saw themselves first as foremost as researchers and 'data developers'. Some indirectly raised a concern that outreach – and 'activism' as it was named, could compromise their independence and neutrality in a sector, which was already highly politicised.

Therefore, BracU and the initiative (strongly encouraged by a mid-term evaluation and by donors) only invested significantly in communication across the network of potential and actual stakeholders, from 2020 onwards.

This included:

- **Direct emails** to international and national workers' rights' organisations, which could be potential users of the data. Emails were sent to 60 national and international workers' rights organisations,

³² Meeting minutes from inception meetings with civil society organisations, brands and buyers, 2017. Meeting minutes from experience sharing sessions with INGOs and workers associations in July 2019 and with RMG entrepreneurs in October 2019

from which three replied, expressing a positive interest in exploring further cooperation. One organisation (MicroFinance Opportunities) expressed interest in a longer-term cooperation and regular use of MiBs data

- **Small introduction and instructional videos** for trade unions, factory owners and brands about how they can use the MiB in Bangla or with Bangla subtitles.
- **A newsletter to over 5.000 subscribers** on BracU's mailing list. The newsletter is in English, but includes links to the promotional videos in Bangla with English subtitles or vice versa. From a factory perspective, the videos propose that factories use the map to promote their existence and compliance with certifications such as the Accord, the Alliance or the BSCI, a suggestion that was supported by the factory representatives interviewed by the evaluation team. They found the map a potentially useful place to showcase their good practices and the regulations with which they comply to the current and potential brands and buying houses with whom they cooperated.
- **Reports and webinars** about how the Covid-19 pandemic affected the sector overall. As explained by CED-BracU itself, *"vested interest groups have always constrained the 'main' project to narrow the information gathering scope and publication"*.³³ In response, BracU published numerous surveys and webinars with a particular focus on the Covid-19 pandemic to *"expand the project's information gathering portfolio and ... test the limits"*.³⁴ The webinars and publications also helped the project use and utilise the large amounts of unpublished data (collected for verification and validation).

It was not possible for the evaluation to assess the effectiveness of this alternative strategy on the engagement of stakeholders or the scope of its outreach as it did not interview any of the panellists and were informed about the events late in the evaluation process. However, the webinars were attended by between 85 and 130 participants on zoom. Panellists represented participants in the PAC and academics. The fourth seminar had representatives from the government and the parliament too. Three of four seminars were mainly held in English. One of the seminars caused a public debate afterwards between representatives from the BGMEA, the Malini Chowdhury Center for Bangladesh Studies and the Centre for Entrepreneurship Development (CED), BRAC University about the interpretation of MiB's data.

The evaluation interprets this as an early – and positive – sign that data does have the potential to influence public debates about the garment Sector in Bangladesh, in line with the intentions that are expressed in the Laudes Foundation's evaluation criteria for early and longer-term outcomes described in section 3.2 below.

Rating

On this basis, the evaluation finds that the project's communication and external learning' was uncondusive

Viewers of YouTube videos 2021 (not unique numbers)

Promotion videos

- For factory owners: **283** views (since February 2021)
- For Brands and Buyers: **196** views (since April 2021)
- For workers: **114** views (since July 2021)

Instruction videos:

- Video 1: How to use the MiB: 33 views since July 2021
- Video 2: Features of MIB Map: 133 views since July 2021

Note: views directly on MiB's Facebook is not included.

³³ Year 4 progress report 2020, submitted to the Laudes Foundation

³⁴ Ibid

– leaning towards partly conducive – overall. Initial communication about the initiative’s purpose and possible use contributed to confirming existing stakeholders’ different perceptions and expectations of data collection, transparency and disclosure.

There was reasonably good communication across the network of stakeholders, particularly towards second half of the project, about how the Covid-19 pandemic was affecting the sector overall, and stakeholders perceived the information as reliable. However, mutual learning only took place at a minimum level.

3.2.5 Organisation and network capacity (A5)

The evaluation finds that BracU’s technical staff demonstrated strong capabilities in data collection (census planning and management), research and data analysis, as well as in adapting and developing the map, especially as under very stressful circumstances, after the foreign software developer’s contract was terminated.

Although these capabilities – and the staff’s willingness to use them – were vital to the intervention’s ability to deliver against planned outputs, the evaluation team finds that the MiB team lacked a political understanding of and management support to be able to navigate in the garment sector, which is vital for any initiative to succeed among the sector’s many stakeholders. This role should have been performed by the MIB management but was not fulfilled in the project’s first, founding years. Communication capabilities and understanding to create outreach and build alliances with stakeholders was therefore also lacking in the first half of the project but has been address in the project’s second half.

The evaluation finds that the project’s management was inclined to perceive the initiative mainly as a research/ data-production project, because it was rooted in research and hosted by BRAC University. The project staff were busy with the every-day challenges of data collection, software development and data updates, and the evaluation finds that they partly lost sight of the overall aim of the project. (This was to provide credible and updated RMG factory information to industry stakeholders in a manner that enables greater accountability for working conditions and enhances confidence in the ability of the sector to contribute to equitable development in Bangladesh).

Some interviewed staff members also reported that they felt that outreach and considerations of ‘data use’ equalled an “activistic” approach, which countered their understandings of academic independence and research integrity.

Rating

Based on this, the evaluation finds that CED-BracU’s organisational capacity was partly conducive only. The technical staff possessed the capacity needed to collect and process credible data. In particular, the inefficiencies and inconsistencies in CED-BracU’s capacity included an:

- Limited capabilities to engage in the ‘management’ of external stakeholders, including PAC members and sector stakeholders in general
- Limited capabilities to develop and implement a clear communication strategy and motivate stakeholders to use data collection.
- Today, external communication comprises part of two staff members’ job descriptions, yet amidst numerous other tasks. No staff member has external communication and ‘data marketing’ and facilitation of discussions and reflections as their primary duty.

4. Recommendations

Based on these findings, the evaluation recommends the following:

Recommendation 1:

Conduct a comprehensive stakeholder interest assessment, to determine the type of data that MiB can realistically provide, including the existing data, against information that could motivate different stakeholders (authorities, brands, factories, INGOs) to use the database systematically and thereby create a demand.

As most of the stakeholders interviewed expressed sympathy with the MiB but didn't use it, the evaluation recommends further exploring what the specific obstacles and motivating factors are for each group. The aim of this exercise would be to strengthen demand for and use of the MiB.

Recommendation 2:

Reconsider the initiative's vision and purpose, possibly with a much stronger emphasis on how traceability (as a first step on the 'transparency ladder') can contribute to further formalising the RMG industry, including 2nd and 3rd tier factories, and paving the way for other efforts (such as labour inspections or efforts to strengthen value chain responsibility) to strengthen transparency and accountability within the sector.

A reconsideration of the initiative's vision and purpose should be carried out, in close cooperation with legitimate representatives from all stakeholders in the sector. This should serve the dual purpose of: a) harmonising expectations and creating a joint understanding of what the initiative is, b) strengthening all stakeholders' ownership to the work done, and c) clarifying the scope of the database: i.e. should the vision be to include all garment companies with a certain percentage of export; Tier 1,2 and 3 companies, or only a proportion of them?

The evaluation recommends that the reformulation of the initiative's vision and the creation of a consensus among all stakeholders on this vision be a precondition for a continuation of the initiative in a second phase.

Recommendation 3:

Conduct a mini-census in the four districts with the most factories, to update the existing database data, remove data from factories that have closed and include data from newly opened factories.

As 7% of factories closed in a period of six months, during the lock-down, without necessarily registering their change of status, the evaluation team recommends conducting an additional 'mini-census' in densely populated areas with factories, to verify the accuracy of the existing data and to include data from newly opened factories.

Recommendation 4:

Strengthen the project's focus on relationship-building with external stakeholders and communication, and seek support from experts with insights into the sector.

Weak project management in the project's first and founding years was a challenge, and not only for the intervention's technical staff, who have done their level best to implement the project, collect the data and establish the database. The limited focus on management also contributed to the project's weak outreach and to the Project Advisory Committee's reduced functionality. Therefore, the evaluation team strongly recommends that the project's current management prioritises 'outwards management' with a strong focus on relationship-building among the key stakeholders in the sector, so those stakeholders can: a) share their inputs and ideas, and b) serve as informal 'ambassadors' for MiB within their own networks.

Recommendation 5:

Ensure that the members of PAC represent and inform other stakeholders within the sector about the MiB's work and are genuinely interested in serving as 'ambassadors' for the MiB.

In order to revitalise the PAC, the evaluation team recommends re-establishing a new PAC. So that it supports the project management effectively, it is recommended that the group consist of:

- a. Representatives appointed by the main groups of sector stakeholders, who can serve as 'informal ambassadors' for the MiB in their own personal and professional networks.
- b. Persons with expertise in communication, 'marketing' and training/capacity building.
- c. Persons (from BracU) with expertise in crowdsourcing and data collection.

Recommendation 6:

Prepare a publicity plan and invest in outreach to possible users of the collected and displayed data.

As documented in this evaluation, most of the interviewed stakeholders were either unaware of the MiB, uncertain about how to use the data or disappointed that their expectations regarding the data being collected were not met. To strengthen their use of the database and the relevance of the data, the evaluation team recommends that MiB invests extensively in communication with (not to) potential stakeholders.

A future phase must ensure that messages are communicated in the same way to different stakeholders, so that the project can contribute to harmonising expectations and promoting a common understanding of what traceability and transparency is and why it is useful.

Recommendation 7: Explore the potential synergies and opportunities for cooperation with the Open Apparel Registry and other databases.

As the Open Apparel Registry has a similar focus to MiB, but covers the entire international apparel sector, it is recommended that MiB explores opportunities for cooperation and establishes the benefits of this for both parties. OAR might – for instance – benefit from MiB's in-depth focus on Bangladesh, whereas MiB could potentially capitalise on OAR's outreach and international user groups.

Similar opportunities for synergy and cross-reference should be explored with national actors, including DIFE, whose labour inspectors use LIMA to upload inspection reports. GIZ supports the development of an accidents' database and might also be interested in a cooperation with and support of MiB.

5. Conclusion

The MiB was initially launched as a response to the absence of comprehensive, credible and dynamic data archives of producers involved in the apparel supply chain, where they were located, for whom they produced and how many workers they employed. This absence has nourished debates and misconceptions among stakeholders in the sector.

The initiative's overarching goal was to *"provide industry stakeholders with real time, credible RMG factory data through an interactive online platform, enabling greater accountability and transparency in supply chains, and enhancing confidence in the ability of the sector to contribute to equitable development in Bangladesh"*.

Although the need for data, which could contribute to traceability and transparency in the RMG sector in Bangladesh, from an independent and credible source such as MiB seems indisputable and is supported by a positive interest in the MiB from almost all of the stakeholders interviewed, and although the data produced

met many of the criteria for ‘useful data’ (see annex V), a substantial demand for and use of the database to contribute to shorter term outcomes, such as those assessed in this evaluation, has yet to materialise.

The evaluation finds that there are several reasons for this. These include:

- The context and the alleged widespread practice in the RMG sector of basing policy making on personal affiliations and entrenched power positions rather than evidence.
- Limited and late considerations of ‘data marketing and engagement of external stakeholders’ in how data can be used.
- Resistance from the trade associations in the PAC and, consequently,
- The fact that 2nd and 3 tier factories and other key information of interest to external stakeholders could not be collected or published, in accordance with the project’s original vision as key industrial stakeholders were concerned about its adverse consequences.

This last point led to a situation where the MiB missed the opportunity to introduce the concept of ‘supply chain responsibility’ between the 1st tier factories and their suppliers (2nd and 3rd tier factories).

Despite this, the evaluation finds that the MiB must be commended for its courageous attempt to pioneer systematic, census-based data collection and updating, and for its ability to position itself as a provider of reliable information about factories’ locations, and membership and certifications, in a sector that is still seriously challenged by precarious and informal working conditions. Labour inspectors and journalists use the MiB to check basic information and consider the site user-friendly and credible. Some academics request information as well, and the MiB has recently nourished relationships with representatives of the Ministry of labour and Employment. Covid-19 lockdowns have delayed this process. Thus, although the MiB did not reach its intended outcomes, it did make a genuine effort. As with other research initiatives, it can be hard to predict if and how research findings are used by stakeholders in the future.

Notwithstanding, the evaluation also finds that the intervention has highlighted some inherent and difficult dilemmas that must be considered as part of a next phase. These include:

- The initiative was hosted by BracU to capitalise on its indisputable capabilities to produce independent evidence of high quality and credibility. The question remains as the extent to which BracU can engage in ‘data marketing’ without compromising its independence and hence credibility? Does and should MiB have the capacity for this? Rather, should this be left for some other entity affiliated to or cooperating with BracU to do?
- Although the Bangladeshi trade associations’ endorsement and cooperation is vital to the project’s feasibility and sustainability, they also represent a serious obstacle to the implementation of the project’s vision and mission and are seriously concerned about the adverse consequences of data disclosure. How can the MiB balance its dependence and its need to maintain independence while insisting on transparency and traceability – the project’s main mission?
- Whereas the need for data that can contribute to traceability and transparency in the RMG sector is indisputable, the demand for such data has yet to materialise. What does it take to bridge the gap between an (obvious) need for this data that and the – still limited – demand for such data?
- Is short-term ‘success’ measured qualitatively, or quantitatively, or both? Initially, the MiB aimed to target all stakeholders in the RMG sector, from national workers, through suppliers to international brands and workers rights’ institutions. Is such a broad targeting still a realistic and relevant aim, or can success be measured in qualitative terms, if the data are consistently used by a smaller but constant number of stakeholders?

While these dilemmas are not easily solved, the evaluation team does encourage the initiative’s stakeholders to reflect on them, as part of broader considerations about how the initiative should continue in a next phase.

Given the magnitude of the challenges that the MiB has faced, key lesson learnt from the initiative might be that:

- Data collection in a sector with limited track records for doing so and a significant number of unregistered factories, remains a significant challenge.
- 'Data is power' and therefore highly politicised.
- The journey from 'basic research' and data collection to outcomes can be long – and sometimes unpredictable. The immediate value of 'basic research' can therefore be hard to determine in the short to medium term.

Annex I - Evaluation rubrics:

Baseline and Criteria for assessment of progress

| Relevant Laudes Rubric | Rubric Translation | Baseline | Evidence of the changes related to the Rubric | | |
|-----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Number and Title of Laudes Rubric | Initiative outcome(s) related to this Laudes rubric | How the current situation is | Specific changes expected (and by when) within each outcome | Criteria (qualitative and quantitative) to assess how substantial and valuable | Initiative's contribution (outputs) to the expected change |
| B1: Building the right processes to create strong, stakeholder-informed policy reforms | Industry stakeholders in Bangladesh and beyond trust the disclosed and validated data and use it to inform their decision making in support of decent working conditions | | Brands use the information to inform sourcing decisions. Workers, (including female workers) use the mapping and data from transparency programs in negotiations and bargaining efforts National government use data for policy development ILO and CSOs focus their work on areas with the highest density of factories. | Number of industry stakeholders who say that they use data from the map to inform decision making Statements from industry stakeholders about the usefulness and use of information disclosed. Evidence of use of data for decision making | Rigorous data collection and disclosure Dialogue with sector stakeholders (researchers, brands, factories) |
| B4: Workers and producers' voices are taken into account in decision-making | Disclosed data is helping to bring the true picture of the sector, which in turn contributes to workers and producers' efforts to design effective campaigning, policy changes etc. | Harmful - see explanation below* | Not specified in the initiative LFA Increase in use of the map by different actors (listed above) for making informed decisions on the RMG sector in Bangladesh | Evidence of industry stakeholders who trust the published data and research and use it for decision making in the industry: <ul style="list-style-type: none"> Statistics on the website hosting the map Number and type of participants attending the stakeholder consultations (around the launch of the map) Number and type of media stories published on the digital map Increase in use of the map by different actors (listed above) for making informed decisions on the RMG sector in Bangladesh . | Rigorous data collection and disclosure. Dialogue with sector stakeholders (researchers, brands, factories) Research and disclosure based on data collected |

B1: In the sector(s) and region(s) that are the focus of this initiative, there is some evidence of a modest mindset shift among policymakers, towards more inclusive policymaking. There are also early signs of stakeholders' recommendations finding their way into policymaker discussions and agendas. The brands' recent practices to disclose the names of factories/suppliers is proof of this.

However, generally speaking, only the less impactful recommendations, related to working conditions, are being incorporated into new or reformed policies or institutional practices at the factory level, and not the more foundational changes.

B4: In the sector(s) and region(s) that are the focus of this cluster of initiatives, powerful forces in government and business are actively restricting the ability of civic movements and groups to engage. They are effectively silencing them; e.g., by imposing new restrictions, deploying divide-and-conquer tactics, and perhaps even endangering their safety.

Consequently, decisions and actions that affect workers, producers and communities are taken with complete disregard for those affected and often exacerbate the status quo; e.g., continue the exploitation of workers, producers and their communities and/or harm natural environments for the purpose of short-term profit maximisation.

Annex II List of Informants

| Date | Name of the interviewee | M/F | Interviewee organisation | Mode (interviewer) |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| Two meetings: Nov. 28. and Dec.2. | 1. Prof. Dr Matin Saad Abdullah 2. Afshana Choudhury 3. Fahim Subhan Chowdhury 4. Faria Ahmad 5. Sadril Shajahan 6. Md Abdullah Al-Kaium 7. S K Jabeer Al Sherazy 8. Md. Faizul Islam, | M F M F M M M | 1. Tech Lead of MiB, Professor, CSE-BracU 2. Lead Operation Officer, MiB & Joint Director, CED-BracU 3. Senior Research Associate, CED-BracU 4. Senior Manager, Research and Knowledge Management, MiB 5. Research Associate, MiB 6. Senior Manager, Knowledge Management & Communication, CED-BracU 7. System Development Coordinator, MiB 8. Research Associate, MiB | Physical (Azmul & Sten) |
| Nov. 28 | Mr. Refayet Ullah | M | Senior Reporter, The Daily Star | Physical (Azmul & Sten) |
| Nov. 28 | Mr. Tapan Saha | M | Textile garments workers Federation | Physical (Azmul & Sten) |
| Nov. 29 | Jashim Uddin | M | Senior Staff Reporter, The Business Standard | Physical (Azmul) |
| Nov. 29 | Dr Khondaker Golam Moazzem | M | Director, CPD | Physical (Azmul & Sten) |
| Nov. 29 | Mahjabeen Quader | F | Senior Policy Advisor, Economic Affairs and CSR, EKN (Donor) | Physical (Sten) |
| Nov. 29 | Nahidul Hasan | M | Sammilito Garments Sramik Federation | Physical (Azmul & Sten) |
| Nov. 29 | Nasma Ahkter | F | President, AWAJ | Physical (Azmul & Sten) |
| Nov. 30 | Mr. Miran Ali | M | Vice President, BGMEA | Physical (Azmul & Sten) |
| Nov. 30 | Jenefa K Jabbar | F | Director, HRLS & Social Compliance, BRAC | Physical (Azmul & Sten) |
| Dec. 1 | Gabriel Prodip | M | Sustainability Project Manager, H&M | Virtual (Sten) |
| Dec. 1 | Fazlee Shamim Ehsan | M | Director, BKMEA | Online (Azmul) |
| Dec. 1 | Michael Klode | M | Advisor, International Law and Organisation Development, GiZ | Physical (Azmul & Sten) |
| Dec. 1 | Mr. George Faller | M | Chief Technical Officer, ILO | Physical (Azmul & Sten) |
| Dec. 2 | Abil Bin Amin | M | Bangladesh Country Manager, ETI | Physical (Azmul & Sten) |
| Dec. 2 | Ms. Sumia Shuchi | F | Senior CSR Specialist, VARNER Retail AS | Physical (Azmul & Sten) |

| Date | Name of the interviewee | M/F | Interviewee organisation | Mode (interviewer) |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| Dec. 2 | 1.Mir Abul Kalam Azad 2.Kutubuddin Ahmed 3.Salahuddin Shopon 4.Tahmina Rahman 5.Kaisar un Naby Rubel 6.Nurul Islam 7.Rafikul Islam 8.Kamrul Hasan 9.Humayun Kabir 10.Ruhul Amin 11.Babul Akter | M M M F M M M M M M M | 1. President, IBC 2. President BGTLWF, Executive member of IBC 3. President BRGWF, Executive member of IBC 4. General Secretary, BAWF; finance secretary IBC 5. Acting Gen Secretary, BJSKP 6. General Secretary, UFGW 7. Organising Secretary, NGWF 8. General Secretary, AGWF; Executive Member of IBC 9. General Secretary, BCWF; Join Secretary, IBC 10. Executive Member of IBC 11. General Secretary, BGIWF; Senior Vice President of IBC | Physical (Azmul & Sten) |
| Dec. 6 | Naureen Chowdhury | F | Senior Programme Manager | Virtual (Sten) |
| Dec. 8 | Paul Roeland | M | Transparency Coordinator, CCC | Virtual (Sten) |
| Dec. 8 | Dr. Guy Stuart | M | Executive Director, Microfinance Opportunities | Virtual (Sten) |
| Dec. 10 | Natalie F. Grillon | F | Executive Director, Open Apparel Registry | Virtual (Sten) |
| Dec. 21 | Jill Tucker | F | Head of Labour Rights Programme, LF | Virtual (Sten & Malene) |
| Dec. 21 | Mr. Sheikh H M Mustafiz | M | Managing Director, Cute Dress Industry Ltd. | Virtual (Azmul) |
| Dec. 21 | Md. Atikur Rahman | M | Sr. Manager (Compliance), AKH Knitting & Dyeing Ltd. | Virtual (Azmul) |
| Dec. 23 | Nur Kashem | M | Asst. Manager (HR & Compliance), Knit Horizon LTD. | Virtual (Azmul) |
| Dec. 22 | Mr. Shafiqul Islam | M | Asst. Manager HR & Compliance, Baxter Brenton BD Clothing Mfg. Co. Ltd | Phone (Azmul) |
| Dec. 22 | Md. Abdus Samad | M | Manager-Compliance, Northern Fashion Ltd. | Phone (Azmul) |
| Dec. 25 | Sanjoy Kumar Paul | M | Manager-Compliance, Metro Knitting and Dying Mills Ltd. | Virtual (Azmul) |
| Due | | M | Manager-Compliance, Mega Yarn (Masihata Group) | Due |

Note: USAID (BD) and the Business & Human Rights Resource Centre were also contacted, but as they have never used the map, they did not feel they could contribute to the evaluation and excused themselves.

Annex III Data Sharing Contacts of MiB

Persons, organisations and Institutions with which MiB has shared the Data after its launching

| International Organisations and International NGOs | | | | | |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|------|---------------------------------------------------------------------------------------|----------------------------------|
| Organisation | Type | Purpose | Year | Contact | Email |
| European Union | International organisation | Requested for cluster/ area wise factory membership data | 2021 | Deputy Head of the European Union Delegation | Jeremy. OPRITESCO@eeas.europa.eu |
| International Corporate Accountability Roundtable (ICAR) | International NGO | Featured MiB in their Apparel Data Directory | 2021 | Nicole Vander Meulen , Senior Advocacy Counsel, | nicole@icar.ngo |
| International Labour Organisation (ILO) | International NGO | Shared MiB database | 2021 | Mr. George Faller, Chief Technical Officer. International Labour Organisation (ILO), | faller@ilo.org |
| Business and Human Rights Resource Center (BHRR) | Human Rights Organisation | Included MiB as one of the data points in their dashboard | 2020 | | |
| Clean Clothes Campaign (CCC) | Global network dedicated to improving working conditions and empowering workers in the global garment and sportswear industries. | Received MiB data through the Laudes Foundation 2020 | 2020 | Mr. Paul Roeland, Transparency Coordinator, Clean Clothes Campaign | paul@clean-clothes.org |
| Microfinance Opportunities (MFO)/ Workers Diaries | International NGO | Requested MiB database | 2020 | Guy Stuart, Executive Director, Microfinance Opportunities | guystuart@mfopps.org |
| GIZ | International NGO | Requested MiB data for cross-checking individual factories | 2021 | Victoria Hohenhausen, Specialist, Monitoring and Evaluation | victoria.hohenhausen@giz.de |
| USAID | International NGO | Assessment of the Labour Sector in Bangladesh | | Kazi Mahmudur Rahman, PhD, Senior labour Monitoring and Evaluation Specialists, USAID | kazi.mahmudurrahman@gmail.com |
| International Data Platforms | | | | | |
| Open Apparel Registry (OAR) | Open-source map and data-base of global apparel facilities | Requested MiB database | 2020 | Natalie F. Grillon, Executive Director, Open Apparel Registry (OAR) | info@openapparel.org |

| Research/ Academic (National/ International) | | | | |
|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-----------------------------------------------------------------------------------|
| Name | Designation and Institution | Purpose | Year | Email |
| Dr. Lipon Mondol | Assistant Professor, Department of Sociology, University of Dhaka, Bangladesh | Requested for compliant information, and number of woven and knit factories. | 2021 | lipon@du.ac.bd |
| Dr. Khondaker Golam Moazzem | Research Director, Center for Policy Dialogue (CPD) | Used MiB data for the research design of following studies <ul style="list-style-type: none"> • “Vulnerability, Resilience and Recovery in the RMG Sector in view of COVID Pandemic: Findings from the Enterprise Survey” • Corporate Accountability on Human and Labour Rights amid Covid Pandemic: Case of Financial Stimulus Package Findings from the RMG Sector” • “State of UNGPs in Bangladesh: Case of RMG Enterprises” • “Challenges of Industrial Safety in the Post-Accord-Alliance Era- Is the Institutionalisation Process Slowing Down?” | 2020-21 | moazzem@cpd.org.bd |
| Professor Dr. Enamul Haque and Mr. Estiaque Bari | Asian Center for Development, Bangladesh | Used the number of workers from MiB in “A Survey Report on the Garment Workers of Bangladesh 2020” | 2021 | estiaque@ewubd.edu; estiaque.07@gmail.com; akehaque@ewubd.edu; akehaque@gmail.com |
| Mr. Md. Anwar Hossain | Assistant Professor, Department of Geography and Environment, Faculty of Earth and Environmental Sciences, University of Dhaka, Bangladesh | Requested MiB database | 2021 | anwar.geo.du@gmail.com ; anwar.geography@du.ac.bd |
| Dr.Tanvir Ahmed | Lecturer, La Trobe Business School, College of Arts Social Sciences and Commerce (ASSC), La Trobe University, Australia | Requested MiB database | 2021 | A.Tanvir@laro-be.edu.au |
| Dr.Sohana Shafique | Co-Principal Investigator, ‘A seroprevalence survey of COVID-19 among factory workers in Bangladesh’, Deputy Project Coordinator, and Facilitator, Urban health Research Group Health System and Population Studies Division ICDDR-B | MiB shared data with ICDDR,B for one of their surveys during Covid-19 on factory workers in Bangladesh titled “A seroprevalence survey of COVID-19 among factory workers in Bangladesh.” MiB also participated in one of their KIIs for this survey. | 2020 | |
| Dr. Nazneen Ahmed | Country Economist · United Nations Development Programme (UNDP) [Former Senior Research Fellow, Bangladesh Institute of Development Studies (BIDS), Bangladesh] | Requested MiB database | 2019 | nazneen.ahmed@undp.org |

| Research/ Academic (National/ International) | | | | |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------------------------|
| Name | Designation and Institution | Purpose | Year | Email |
| Ms. Mimnun Sultana | Assistant Professor, School of Business and Economics, United International University, Bangladesh | Requested following data: 1. Total Number of garment factories in Bangladesh 2. List of garment factories in Dhaka with address, GPS Location and number of workers (male-female) in each garment 3. List of garment factories in Dhaka with social compliance certification (BSCI or SEDEX) | 2019 | mimnun@bus.uui.ac.bd |
| Ms. Shirleen Manzur | PhD candidate, Department of Economics, Simon Fraser University, Canada | Requested following data: 1. Name, address, GPS location of factory 2. Factory building type 3. Year of establishment 4. Products manufactured 5. Number of workers (male-female) | 2019 | shirleen_manzur@sfu.ca |
| Ms. Mehnaz Rabbani | Programme Lead Research, Policy and Governance, BRAC Institute of Governance and Development, BRAC University, Bangladesh | Data was solicited for re-search conducted by BIGD, Brac University, Bangladesh and SOAS, University of London, England. | 2019 | mehnaz.rabbani@bracu.ac.bd |
| Mr. SM Shihab Siddiqui | Doctoral Student, Department of Economics, University of Oregon | | 2020 | smshihab@uoregon.edu |
| Yogesh Avhad | MS in Supply Chain Engineering, Georgia Institute of Technology | | 2020 | yogesh.avhad@gatech.edu |
| Dr. Luigi Minale | Associate Professor, Department of Economics, Universidad Carlos III de Madrid | Requested factory establishment year | 2020 | lminale@eco.uc3m.es |

Annex IV – Planned and realised outcomes

| Outcomes Planned | Outcomes Realised |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Planning | |
| Three MoUs signed with BGMEA, BKMEA, and DIFE by October 2018 | MoU's and ToRs signed |
| TOR signed by diverse PAC members (10) | |
| Technology development for Mapping Application | |
| Short Term: Design a customized program for data collection, verification & validation protocol (including timestamping data) | Verification and validation methodology tools developed and applied |
| Medium Term: Beta testing and ground truthing successful and program roll-out scheduled | Program rolled-out and scheduled |
| Mapping application development | |
| Mapping application development Mapping application improved and finalized according to lessons learned from trial and testing group feedback | Mapping application finalised and functioning |
| Survey | |
| Successful data collection process supported by properly functioning tools and capable, informed staff | Data collection process supported by tools and capable, informed staff is functioning. |
| Short Term: Improved access to credible information on RMG factories in Bangladesh across all supply chain levels, including lower tiers within Cluster 1 -5 | Interested stakeholders (English speaking) have access to credible information of the RMG factories in Bangladesh (Tier 1) with a focus on factories that export +80% of their products. |
| Medium Term: Government within Cluster 1 - 5 acknowledge the issues in subcontracting factories and are better equipped to identify and represent worker's priorities | N/A |
| Long Term: *Workers demand in subcontracting factories are integrated and within advocacy strategies of BGMEA and local government in Cluster 1 - 5 | N/A |
| Launch of the Live Map | |
| Short Term: First ever digital RMG map containing information on all RMG factories in Dhaka Cluster publicly accessible | Interested stakeholders (English speaking) have access to credible information of the RMG factories in Bangladesh (Tier 1) with a focus on factories that export +80% of their products. |
| Medium Term: Mapping tool utilized by stakeholders (will be determined from the stakeholder consultation workshop/s on what they want to use the map for) | Journalists and labour inspectors use the data to verify factories basic information and locations. Some academics ask for access to MiB's raw data |
| Long Term: Trade Associations, Donors, Government, TUs, worker advocacy groups use the data from the map within their advocacy strategies | N/A |

| Outcomes Planned | Outcomes Realised |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Launch of final map | |
| Short Term: First ever source of credible, validated and verifiable information on the RMG sector in Bangladesh | MiB data available and perceived as reliable and credible by stakeholders using the data. |
| Medium Term: Informed decision making by policy-makers, buyers, financiers, etc. regarding policy actions, purchasing decisions, financing opportunities, etc. with intention to enforce a transparent RMG supply chain | N/A |
| Long Term: Advocacy & national level action plan on how to mainstream and improve subcontracting factories | N/A |
| Convening | |
| Consensus and support strengthened of all stakeholders towards transparency and accountability sector | N/A |

Annex V Assessment of the MiB Data against the criteria for 'data use'³⁵

| Criteria | Definition | Evaluation assessment |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| Easily accessible | The data displayed is easily accessible and does not require special knowledge or funding to access | Yes |
| Named | The data is linked to an identifiable entity (e.g., brand, factory, supplier or auditor, while protecting personal information such as identities of individual workers, or home addresses of producers); | Yes |
| Standardised | So that users can compare peers on a like-for-like basis; | Yes |
| Regularly updated | So that users can compare performance over time; | Not yet/in progress |
| Detailed | With sufficient granularity to be able to challenge accuracy and take action | To be determined by potential users |
| Comprehensive | Includes all or at least the majority of relevant entities; | Partly |
| Reusable | Licensed so that others have permission to take, combine, analyse and apply the data in other circumstances. | Yes |

³⁵ Source: Laudes Foundation Transparency Circle