Setting up Anti-harassment committees and violence prevention systems

The experience of Fair Wear Foundation

1.1. Overview

The 3-year project Anti-harassment committees and violence prevention system in export oriented garment production sites was funded by the UN Trust Fund to End Violence against Women. Thanks to its success, FWF gained further funding to extend and further expand its work on the elimination of violence against women. This document is a reflection of the experiences of the project team.

Project activities were carried out at three different levels:

- At factory level, the project trains management and workers on violence against women and the setting up of anti-harassment committees ran by workers.

- At community level, the project builds a network to provide a supportive environment to the anti-harassment committees, through workers' helplines and support from local workers' organisations.

- At international level, the project uses the leverage of FWF member brands over production sites to coach management and support anti-harassment committees. It also participates in international forums to advocate for the elimination of violence against women.

1.2. Setting up a programme

It took nearly half a year to set the project up in India and almost one year in Bangladesh. Many brands initially agreed to include their suppliers in the training during the proposal writing period, but when they were approached for the roll-out, some of them became reluctant. Some of the reasons they gave were:

- Brands did not consider violence against women an issue or a risk in their supply chain.

- The lack of a designated CSR staff member.

- The lack of visibility of the issue. Brand staff said they had never witnessed any incidents during their visits.

- The perception that issues such as sexual harassment are a thing of the past.

Brands are often unaware of the impact of violence on individuals, society and their business. Tackling the problem is generally perceived as a cosmetic improvement.

Those brands that understand the importance of combatting violence against women often claim it is difficult to convince factory management of implementing solutions. And these brands turn to Fair Wear Foundation for help.

1.2.1. Achieving brand involvement

At least for a number of suppliers in Bangladesh, violence against women is an issue raised by the brands, rather than a perceived point of improvement for production sites.

Brands that recognise the need to prevent and reduce violence against women often feel like they lack the knowledge needed to persuade their suppliers. In both India and Bangladesh, brands asked FWF to provide a list of clear benefits to the suppliers, in order to promote the participation.

In other cases FWF member brands claimed they lacked sufficient leverage at their suppliers to make a change. Nevertheless, leverage does not seem to be a factor affecting supplier participation in the FWF project. FWF observed some production sites left the project because of lack of coordination within the brands themselves, and some others decided to continue with the project even after the brands had stopped working with them.

For brands themselves, internal support for CSR issues such as tackling violence against women is also highly dependent on internal communication and perception of the problems. Often, CSR departments have limited power and little influence on sourcing decisions.

Another problem is the normalisation of violent behaviour, and the spiral of violence: due to tight deadlines and high production pressures, factory work in the garment industry is very stressful. This, paired with the fact that it is culturally not frowned upon to channel negative emotions towards persons of a (perceived) lower social status creates a cascade of violent behaviour. Top management at production sites feels unable to speak up to the brand about its sourcing practices, for fear of losing business, so they pressure midlevel managers. They, in turn do not feel free to talk about production issues they face, and in turn pressured line chiefs or supervisors. At the end of that line are the workers, who have nowhere else to turn.

Therefore, an important part of the sensitisation is helping brands understand that they also carry responsibility for issues of violence against women in production sites, and that they can implement changes in their sourcing practices, such as better communication with suppliers and better planning, to improve the situation.

Finally, a factor that seem to affect participation in the FWF project on preventing violence against women is the quality of the business relationship that a brand has with the production sites it sources from. Especially in cases without intermediaries or agents, long-term relationships with brands seem to be more conducive to participation in a project of this kind.

Nevertheless, for most production sites in the project the buyer-supplier relationships are not so straightforward. Suppliers rely on agents, or are sub-contractors themselves.

Brands are only one side of the equation towards violence-free working environments. Top management at production sites needs to be convinced of the need for a programme for the prevention of violence against women. Without their support, the project cannot be successful.

1.2.2.　　Getting production sites on board

Factory managers are often unaware of the real extent of the problem. Most managers deny violence against women occurs in their production sites. Often, their definition of violence is narrower, and does not include situations such as verbal abuse:

For example, a manager said: "*I agree that rape, murder, beating up women, those are violence against women. But yelling? No, no… Everyone yells in Bangladesh. Especially at work, something was done wrong. One yelled at the other. It is normal. If you call this harassment, then I cannot manage a factory*".

Nevertheless, factory managers agreed that training that allows workers to protect themselves and prevent violence against women is desirable. They were, however, unaware that it was a legal requirement to set up anti-harassment committees.

Another issue is the involvement of local trade unions. These work together with Fair Wear Foundation to develop modules and are a source of trainers and worker interviewers. Factory owners and managers in both Bangladesh and India are often wary of the intentions of trade unions and NGOs.

1.2.3.　　Delay factors

Agreement to join the project does not mean that the training sessions can begin immediately. High production pressure or tight production schedules are often given as reasons to postpone the sessions.

1.2.4.　　Lessons learnt

The following lessons can be drawn, based on the experience of FWF in India in Bangladesh:

- *Real commitment of the brand is needed.* Ideally a survey or research on violence against women should be carried out to gather information before communicating the problem to the brands. Facts and figures play an important role to secure their participation.

- *An incentive system for brands could encourage brand participation.* For example, FWF or the project pays for some audits for the production sites, which ease the budget of the brand for monitoring. In addition, FWF rates *brand* performance on *addressing violence against women* if they source *in* Bangladesh or India. Joining the project then becomes an inexpensive way to get a higher score in the performance check rating.

- *Factory management needs to be convinced* of the use of preventing violence against women. Changing behaviours or beliefs with a few trainings is not effective, even less so if production sites only join because brands invite them, to make themselves more attractive to western buyers, to meet requirements, or do the brand a favour.

- *An incentive system for production sites could provide more meaningful engagement.* Although this point should be further researched, because from this project it was unclear whether the "participation certificates provided" made the project more attractive.

- *The process should rely on, but be independent from, the business relationship between brands and production sites.* While factory participation may be higher in the beginning thanks to strict participation requirements, this does not necessary lead to improved outcomes.

- *Education and coaching* of top managers at both the factory and the brand should be a constant throughout the project.

1.3.   Training for top and mid-level management

The project used external resources to train factory managers. The partners in Bangladesh and India were either NGOs that research labour rights, labour rights campaign groups, or trade unions. None of the partners had experience in training top management. In the beginning, the project made use of a renowned CSR consultant in Bangladesh. Social hierarchies led partners to believe that this consultant would be more respected by factory owners. The CSR consultant trained one partner in India and another one in Bangladesh to deliver the training later on in the project.

1.3.1.   Participation of managers at different levels

The involvement of top management, especially factory owners, was an indicator of success. The more involved the top management, the more functional the anti-harassment committees became.

Some production sites let mid-level management staff participate in the training, others let them join frontline managers. Regardless of which session they attend, it is important that mid-level management participate. The direct supervisors to front line managers are mid-level management staff, and workers can approach them more easily than others at production sites.

1.3.2.   Content

The training included an introduction to Fair Wear Foundation and the 8 labour standards in the FWF Code of Labour Practices, an explanation of the workers' helpline (complaints procedure), the definition of gender based violence, forms of violence, the local legal framework to prevent violence and punishment, and an explanation of anti-harassment committees and factory policies.

1.3.3.   Training method

The trainers used PowerPoint presentations, activities and games, and group discussions during the trainings. In Bangladesh, after comments that the games were too elementary, the trainer adjusted the gender role session. The trainer used a [video](#) made in the production sites to raise discussions among top management. This method was more effective.

The trainer then raised the following questions:

1) How realistic is this video clip?

2) Have you ever seen or heard similar cases such as bullying or scolding with such sexually explicit profanity?

3) How could such practice affect business negatively?

4) Do you consider it as harassment? Why?

1.3.4.   Challenges

When promoting the workers' helpline and explaining FWF's complaints mechanism, the trainers experienced resistance from several production sites. One participant explicitly said: *"We don't think we need an external complaint system since we have a strong internal complaint and grievance system. We also have an independent audit team."*

Other participants disagreed: *"The FWF complaint mechanism will not only help workers to express their grievance, it will also help factories to avoid conflicts and disputes. Very often, workers seek supports from trade unions who take away a good amount of settlement money from workers. If the FWF complaint system works properly, both workers and the factories will be on the safe side."*

This thought made all production sites agree to post FWF's helpline stickers to distribute the helpline telephone number.

The training session also discussed how to run election for an Anti-harassment committee. Most management did not agree on a democratic election process. After negotiation, they agreed to let workers come up with nominees for voting using the "show of hands" method.

1.3.5.   Lessons learnt

- *For management, group discussions are more effective than games as means of training*. Managers felt that games did not acknowledge their existing knowledge.

- *Group discussions require a very well-trained facilitator, who has experience and knowledge of gender-based violence, and who understands the perspectives of factory management.* Asking questions and using opportunities to comment are effective techniques in top management training. It is important that trainers are not (perceived as) judgmental

- *Using new technologies is attractive to factory management*. Playing videos and animations led to positive feedback.

- *The use of audience-response systems could be effective with business audiences*. It was not used with factory management in this project.

- *Training sessions should also be seen as an opportunity to negotiate*. The sessions were used to guarantee commitment to the distribution of the complaints helpline information, and to negotiate agreements regarding the anti-harassment committees.

- *The FWF Code of Labour Practices and the 8 labour standards should be included in the training*. Management should understand that violence refers to issues wider than sexual harassment, and can also include forced resignations or wage cutbacks.

1.4.   Training for front line managers

Frontline managers are called line supervisors or line chefs in Bangladesh and India. Providing training to this group was difficult in Bangladesh, because these managers are needed all the time during production and therefore it was very difficult to gather all of them in one training session.

Sometimes, the trainer only trained part of the target group and let them pass on the message through peer education.

1.4.1.   Participation of workers

In Bangladesh, the training for front line managers was separate from the worker training, to ensure workers dared to speak out. Nevertheless, the contents of the training were the same for both groups. The emphasis and method of training were different because front line managers were usually male and some of them were perpetrators of violence against the (mostly female) employees.

Occasionally, the trainer put the supervisors and workers in the same session. According to the trainers, such sessions were very successful because they could bring supervisors and workers together and inspire them to think from the other's perspective.

1.4.2.   Content

The training included an introduction to Fair Wear Foundation and the 8 labour standards in the FWF Code of Labour Practices, followed by an explanation about harassment and anti-harassment committees. The FWF helpline and complaints procedure were also introduced.

In general participants found the contents very relevant. Many reflected on how they treated their female co-workers. Supervisors also showed sympathy to their female colleagues facing harassment. "Favouritism in lieu of sex is not new in garment industry, even in our factory. Sometimes, girls have no other choice but to accept offers from their superiors. If the definition of sexual harassment is known, we will be able to prevent it"

1.4.3.   Training method

This audience was quite receptive to games and role play activities. Trainers thought that activities like role play provided a confronting experience to supervisors, who saw their treatment of women mirrored during the role playing sessions.

Trainers gathered stories by interviewing workers, and chose stories that were often mentioned at the factory to demonstrate the issue.

In another training, trainers wrote down abusive behaviours or inappropriate words on flashcards and showed them to the participants. These flashcards were customised for each factory, based on previous worker interviews. The participants were then asked whether the behaviours and words represented there had been used in the factory, and how they felt after reading them out loud. They were asked to reflect on their behaviour in the factory, and how this could be turned around into a better working environment.

1.4.4. Challenges

Supervisors found it difficult to implement their newly-acquired knowledge on the work floor. Among the reasons for this is that supervisors felt pressured by senior management, which speaks to the importance of training top and middle management as well. For example, a supervisor said that yelling at workers is considered inherent to his work: "we are also exposed to harassment from our superior line management. If all staffs are not educated and if top management does not integrate the practice wilfully, hardly anything will change. We do not want to scold workers, we are forced to do so, since is it taken as our performance."

Peer pressure is another factor that contributes to verbal and physical harassment: "I don't want to yell at the workers because I think they deserve better. But my boss and other supervisors think that I am not capable of managing the production line. The more you yell at workers and the dirtier the language is, the better they think you are as a supervisor. So I also have to do it"

In addition, supervisors said that they found it difficult to implement the knowledge they acquired in real situations. They could make promises during the training and they felt that they should not use sexually explicit profanity. However some of them honestly said that once they were back in the working environment, they would still be unable to treat women equally.

The results of the training and setting up of the anti-harassment committees showed that the verbal and physical harassment was perceived to be significantly lower, according to the workers. This suggests that increasing consciousness about their own behaviour might contribute to less violence, even though some supervisors said they were not confident that they could stop harassment themselves.

1.4.5. Lessons learnt

- *Training increases knowledge, but does not lead to immediate behavioural changes*. "Stress", "pressure from the top management", and "production" were frequently quoted as reasons for abuse. Lack of management skills is perceived by supervisors themselves as the reason to use violence. Because of these root causes, one training session will not be enough to change the situation.

- *Many supervisors feel that they needed to be abusive to show that they have power over production workers*. Although some felt that it is unfair for the workers, who are mostly women, they enjoyed the privilege being the "boss" in the production floor. They are too used to see women being abused, and are not motivated enough to stop violence when it happens.

- *Some supervisors felt powerless themselves, because of ingrained social systems that are reflected in the factory*. They said they could not change anything unless society or the factory organisation is

changed. While this might be true, it is often used as an excuse to continue violence in the factory floor.

- *Supervisors learned from complaint cases handled through the FWF helpline or the anti-harassment committees*. Although there was often reluctance, supervisors understood that women were forming a united front against violence, with support from the brands and sometimes top management. The supervisors felt that they could not fight this trend.

- *Peer education for this group is not as reliable as for production workers.* In most cases, the project trainer had to spend more time in the factory, wait for more supervisors to be available to conduct another session, or to go to the factory twice for the training.

1.5.   Training for workers

These trainings became quite popular among the workers. In India, the worker training session usually covered all workers at once. Many workers asked for repeated training to be able to understand more. In Bangladesh, most production sites have over 1 000 workers, which made it difficult to give the training directly to all workers. Workers were reached via peer training instead.

1.5.1.   Content

The contents of training sessions for workers were similar to those for frontline managers. Encouraging workers to express themselves with regard to harassment and sexual harassment was a crucial component of these training sessions, in order to make workers aware of their rights, and to encourage them to report harassment and claim their rights.

The training also included knowledge on labour rights and FWF's complaints procedure. This is a unique opportunity for the helpline to the workers's trust. Many workers who called the helpline during the project period said that they got the helpline number either directly from the trainers or from colleagues who joined the training.

The trainers said that they needed to explain rights and responsibilities to the workers very clearly. The training should not lead to fights between workers and managers. Rather, the training should encourage effective communication and stimulate further learning on gender, rights to organise and infrastructures in the society that provide support to women.

Almost all women workers who attended the training said that they learned a lot on what is violence and how to deal with it.

Some said they would even bring the knowledge and information to their neighbourhood: *"I will inform my colleagues and my neighbours about the Bangladesh High Court Verdict on anti-harassment. My colleagues already mentioned challenges when reporting harassment cases. But in my view,*

creating awareness among all is the first challenge we should overcome. We need more training programs. If my supervisor or line-chief does not understand what I am referring to by saying anti-harassment, and if my colleagues do not come by my side, I am alone and powerless."

1.5.2. Training method

The training sessions were delivered after training for top management and frontline management staff. This allowed to arm management with knowledge on gender-based violence so they would be able to deal with issues that could arise once workers received training. It also helped prevent management from demanding to attend workers' training sessions.

Role-play and forum theatre were applied during the workers training session. These methods were liked by workers. One of the role plays was based on a true story from the factory floor. The trainers prepared and directed the role play. Participants were asked to comment and go up on stage to change the play.   Later, they were asked to stage cases of harassment from their real life experiences.

This process allowed participants to explore issues of harassment, and its causes and catalysts. The trainers showed participants a list of harassing behaviour that they mentioned in their role-play and presentations. Trainers explained what is counted as harassment and what did not—and why.

Trainers discussed sexual harassment behaviours in Ready Made Garment production sites and the possible remedy. Participants were asked to stage their own experiences of sexual harassment in workplaces and asked to try to suggest solutions and discuss challenges.

Then, trainers discussed legislation and legal recourse to prevent and fight sexual harassment. Trainers described the setup and role of Anti-harassment committees, and their importance for preventing sexual harassment at workplaces. Participants then staged a role play on how to form an Anti-harassment committee and how to communicate to the workers about the benefits and importance of Anti-harassment committees.

1.5.3. Challenges

In Bangladesh, community peer-to-peer education was used to reach more workers. The workers who attended the training and members of the anti-harassment committees were asked to disseminate information to other workers. Then they were asked to report back and share their experience on the peer-to-peer education during an anti-harassment committee meeting. The process was also used as an opportunity to distribute FWF's helpline numbers and the idea of having organised workers.

It is very difficult to monitor the outcome of the peer education sessions, primarily because most workers are not able to read and write. They work long hours, 6 or 7 days a week. They do not have much time for peer education. In addition, they are afraid of retaliation if they write down names

of workers they train or the contents of their training. Despite the difficulties, it can be seen that peer education had been organised to a certain extend because most callers to the FWF helpline said that they had heard about the helpline from a colleague who had attended a FWF training. None of the peer education sessions has been properly documented or evaluated. Making the peer education session more organised and effective is still being developed.

1.5.4. Lessons learnt

- *Due to high employee turnover in the industry, it is hard for one training session to have long term impact*. In the short term, providing repeat sessions will help. To be more sustainable, peer education needs to be further developed and organised.

- *Forum theatre and role play come from real-life stories of workers are most effective when giving training to this group of workers*.

- *Workers want to know the laws and what kinds of behaviours can be punished by law.* Without a proper legal system, workers do not have enough confidence to speak up on sexual harassment.

- *Group discussion seemed to be interesting for workers.* They learned most through asking questions and having discussions with each other and with the trainer.

- *Different from the supervisors, most workers said that they believed that they could speak up in case of harassment.* There might be two reasons for it:
  - o Workers tend to be "nice" to the trainers and try to give the "right" answer.
  - o While supervisors did not want to give up some of their powers, workers might actually gain something (less violence) if they speak up. Thus workers do have the tendency to speak up.

- *While awareness grew, there is still room for improvement.* The project received about 500-600 calls in total. It is an impressive achievement for FWF as there was no call in the baseline. Nevertheless, considering the amount of workers trained directly and through peer education, the number is low. The project needs to find out how to trigger workers from the stage of "intend to speak up" to the stage of "speak up".

- *Rules on how to randomly select workers to join the training do not work*. Production sites have to prioritise production. They might not be able to have the flexibility to select workers randomly or solely based on their preference. In many cases in Bangladesh, although management selected participants for the training, participants turned out to be quite active and interested to express the interest of the workers.

1.6. Setting up anti-harassment committees

The anti-harassment committees were composed of representatives elected among volunteer candidates. Several factors were taken into consideration in order to establish the composition of the anti-harassment committees, including: a representative number of members, female participation, the manner of election of the president or leader of the committee, and whether management would be allowed to participate.

1.6.1. AHC elections in India

In most production sites in India, elections were organised by workers together with trainers. Anonymous voting was used to elect workers representatives. The candidates were volunteers.

Since production sites generally employ between 200-500 workers, trainers were able to train the whole work force in one big class room in one session. Workers were then asked to volunteer or nominate candidates to represent them.

The anti-harassment law guided the election, and most factory management in India agreed with the trainers' request to have an elected committee.

The election was held by anonymous voting. Trainers separated workers into groups according to their production line. Each line elected their own representative(s). The AHC members then elected the president of the AHC.

1.6.2. AHC elections in Bangladesh

In Bangladesh, anti-harassment committees have to be formed based on the rules for worker's participation committees. In that case, management staff must be represented by at least one person in the AHC.

Also, due to the resistance of factory management and the difficulties of training all workers, a semi-democratic election process was used.

Production sites in Bangladesh usually employ between 1000 and 3000 workers per factory. Therefore, it was impossible to train all workers directly.

Another hurdle was that factory managers were more resistant to elections. This was not helped by the fact that legal regulation on anti-harassment does not exist in Bangladesh. Also, the relationship between unions and employers is tense.

To achieve the goal of establishing anti-harassment committees, trainers in some cases agreed to management forming AHCs without their presence. Trainers then visited the AHC and checked whether the members were able to represent the workers.

Often, the AHC members selected by management did not know their responsibilities, and they did not fully understand the concept of harassment.

When that was the case, management was informed, and trainers requested a new election.

Acting in this way gave trainers the opportunity to coach management on committees and elections. At the beginning of the project, management tended to disagree with the procedures for the election, saying they would run an election in a better way themselves. Trainers then encouraged them to set up their own election system.

In the semi-democratic election process, workers were asked to volunteer as candidates. The trainers also agreed when management nominated candidates. Then the candidates were asked to turn their back towards the rest of the workers. Votes were counted based on 'show of hands'. In order to minimise the possibility of retaliation, management were asked to turn around or leave the room during the election.

1.7. Making the AHCs functional

1.7.1. Electing committee members

- In India, workers usually did not have anything to report or discuss after the election. They still did not know how to run the committee or how to get workers to come forward with cases. Therefore, a series of training sessions was designed to increase level of knowledge about the issues among AHC members, and to encourage them to speak up.

- Using phone conversations to coach AHC members is an effective way to improve the functionality of the committee. It was not always possible for trainers to carry out as many visits to AHCs in Bangladesh. The situation was somewhat better in India. In Bangladesh, management cancelled or postponed visits at least once, citing prioritisation of activities such as production, audits, safety inspection and rebuilding.

- When the committees were elected, the members often faced more harassment and were laughed at by co-workers or supervisors. Some AHC members quit their positions because they felt that they could not operate the AHC to its full capacity.

- In Bangladesh, a number of workers called the FWF helpline to file complaints. The project team used these complaint cases to coach both the committee members and factory managers on how to use the AHC. Then, the committee members and factory managers were better able to handle other cases independently.

- Anti-harassment committees still have little ability to deal with some issues at production sites. For example, while in some cases they were able to stop verbal abuse and physical violence from front line management, they had few means to

deal with cases of bullying or unfair dismissal. FWF was notified that in some production sites, violence against women has taken new forms, such as forced resignation or reduced income.

- Very few cases of sexual harassment and sexual assault were reported throughout the duration of the project. More research needs to be done, but a possible explanation is that there is the need for more trust in the project and in anti-harassment committees for workers to come forward with these types of complaints.

1.7.2. Coaching managers

- The first part of the coaching introduced incentives for managers to recognise the status of the anti-harassment committees. Managers were made aware that building a functional internal grievance procedure would help reduce the number of complaints filed at FWF.

- Employers felt that it was embarrassing for their customer brands to know about the complaints in their own production sites through FWF's helpline. The project team agreed with employers that if the team received a complaint which could be dealt with through an internal process, the team would present it to the AHC and the management concurrently. This would provide an opportunity for the two parties to discuss the case and establish a remediation process that, if successful, would avoid the need for a complaint.

- Most complaint cases in fact were resolved promptly when the team informed the factory management. Often these cases dealt with individuals, and covered issues like forced resignation, verbal or physical abuse or labour rights violation.

- Reducing the number of complaints taken up by FWF did not necessarily serve as an incentive did not work when the case involved more workers or the general practice of most supervisors at one factory.

- The project needs to find out how to gain real commitment and motivation for top management to reduce violence in the production sites. It seemed that top and mid-level managers are quite aware of the definition of violence. However, more work needs to be done towards helping them realise how lower levels of violence could also be beneficial to their business.

- Often, insufficient management skills led to verbal and physical abuse by front-line management. This could be avoided for example, through enrolling front-line and mid-level management staff in management courses, so they are better able to manage workers without resorting to violence.

1.7.3.   Leveraging brand influence

- Although most top managers said that they were committed to the project and convinced of the need for it, very few top managers supported the anti-harassment committee at first. Some managers said that their factory was not ready for such a change. Others tried to postpone or hinder anti-harassment committee meetings.

- Serious involvement of brands contributes to a better performance, both of the factory and of the AHC.

- FWF integrated anti-harassment committees in its brand performance check indicators. While this helped with factory recruitment, the involvement of brands is not detailed. Therefore, the link between the FWF brand performance check and involvement in anti-harassment activities should be further explored.

1.7.4.   Operating the complaints helpline

- Building good relationship with factory management, in particularly the factory owners, is crucial to the success of anti-harassment committees. The project coordinators in India and Bangladesh experienced significant changes in management's attitude and behaviour after working with them on the project individually.

- Top management did not prioritise the training or meetings. They would react when there was a complaint, especially if the complaint could not be solved internally. The team used complaints-handling as a unique opportunity to coach factory owners, gain their trust and seek change.

- The helpline was also used to connect and protect AHC members, for example if they were being bullied in the production sites.

1.7.5.   Working with other organisations

- An anti-harassment committees organise workers at factory level. Worker representatives in the committee are employed by the factory. Currently, these representatives are in a vulnerable position, and their work needs to be supported by a larger network of organisations including unions, labour-friendly NGOs and other similar organisations.

- Unions are still building trust among workers. The rate of unionisation in general is lower than 10% in both India and Bangladesh, and the garment sector has particularly low rates.

- In Bangladesh workers often do not understand the benefits of joining a union. This is often paired with low wages, which make it difficult for them to pay union fees. Workers do join unions when they feel collective action will lead to better outcomes. Yet local unions often lack the membership and financial resources to operate proficiently. The project presented an opportunity to raise membership, but it also meant an opportunity for unions to charge workers if they were able to get compensation. Because of this, many workers first wanted to know whether the helpline was linked to a union. If this was the case, then they would not raise the case, for fear that the union would take a percentage of the compensation money.

1.8.   Support through Brand Performance Checks

- More work needs to be done to ensure further brand involvement. Currently, brands that enrol their production sites in the project get a positive score in the Brand Performance Check. However, this does not mean that brands have integrated anti-harassment initiatives in their supply chains. One possibility is to rate the brands according to the number of functioning AHCs proportionate to their supply chain.

- By integrating anti-harassment in a brand's monitoring system, using FWF's resources and methodology, gender perspective is being built into the audit methodology. Brands could also gather gender segregated data to analyse the situation and risks.

1.9.   Conclusions and recommendations

- Training alone is not enough for top management. The project needs to build their capacity and change their attitudes through continuous coaching in complaints handling and AHC follow up sessions.

- Further managerial skills training is needed for mid-level managers and line supervisors.

- Workers training should not rely on conventional classroom training. FWF needs to develop peer education to cover more workers and be more sustainable.

- To sustain the work of AHCs, their members need to be respected and given negotiation abilities. The project should try to bring them out of the production sites and learn from other workers' organisations, including trade unions and NGOs

- The helplines need more support to adequately handle more cases of violence against women, especially cases of sexual harassment and sexual assault, The project should expend it partnership to a wider network, seeking partnership with

organisation that specialise in gender-based work, or on providing shelters.

- Brands should receive further training to integrate anti-harassment policies in their supply chain monitoring. This needs further discussion within FWF.