

# From Rana Plaza to COVID-19: Deficiencies and opportunities for a new labour governance system in garment global supply chains

Stephen J. FRENKEL\* and Elke S. SCHUESSLER\*\*

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**Abstract.** *The 2013 Rana Plaza disaster highlighted the failure of labour regulation in global garment value chains. Eight years on, in the midst of the COVID-19 pandemic, what changes have occurred in labour regulation and with what consequences for workers? Using the concept of a labour governance system (LGS), the authors show that, despite improvements in building and worker safety regulation, the garment LGS remains weak and wages, working hours and the treatment of workers show little improvement. The pandemic appears to have exacerbated these deficiencies but it may also offer an opportunity to strengthen the LGS along lines proposed in this article.*

**Keywords:** *global value chains, global supply chains, labour regulation, labour governance system, garment industry, Bangladesh, Rana Plaza, COVID-19.*

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## 1. Introduction

The Rana Plaza building collapse in April 2013, which resulted in over 1,000 deaths and many serious injuries, exposed the failure of building safety regulation in Bangladesh's garment export industry. This calamity raised anew the

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\* UNSW Business School, Sydney, Australia, email: s.frenkel@unsw.edu.au. \*\* Institute of Organization Science, Johannes Kepler University, Linz, Austria, email: elke.schuessler@jku.at (corresponding author). The authors would like to thank the anonymous reviewers, the editors of this Special Issue, and in particular their handling editor, Arianna Rossi, for useful comments in developing this article. They gratefully acknowledge funding by the Volkswagen Foundation for the research project "Changes in the governance of garment global production networks: Lead firm, supplier, and institutional responses to the Rana Plaza disaster" under the Europe and Global Challenges programme. They thank all project team members for their contribution in collecting the data on which this article is based, and Jaco Fourie and Maria George for their excellent research assistance.

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question of how to uphold labour standards where existing labour governance institutions are too weak to protect workers from the effects of global competition while powerful Western lead firms continue to squeeze suppliers based in the global South.

The second section of this article introduces the concept of a labour governance system (LGS), distinguishing between “strong” and “weak” ideal types that illuminate contrasts between sets of national and transnational institutions that have significantly different effects on outcomes for workers in global value chains (GVCs). In the third section, using our own and others’ data on post-Rana-Plaza regulatory developments, we examine which elements of the Bangladeshi garment LGS have changed in recent years and how these changes have affected procedural and substantive worker outcomes. We find that, although building safety has improved, the LGS overall remains weak. This weakness can be explained by remaining regulatory gaps in the LGS and underlying unchanged power relations in the supply chain more generally. The fourth section discusses how COVID-19 has revealed these weaknesses and has hampered further reform efforts. However, we argue that the pandemic could act as a new, extended focusing event, providing opportunities to address recurrent problems like “fast fashion” production systems and weakly organized labour. We conclude by proposing reforms that would be likely to lead to a stronger, sustainable LGS in the Bangladeshi garment industry.

## 2. The concept of a labour governance system

Economic globalization and the rapid expansion of GVCs over the past 20 years have stimulated efforts to prevent the erosion of labour standards (for example, Hendrickx et al. 2016). The emergence of transnational labour governance initiatives has brought many challenges, including that of ensuring the compatibility of different forms of regulation (private versus public) found in these new multilevel LGSs (Marginson 2016).

The LGS concept, inspired by Clegg’s (1976) industrial relations theory, refers to a set of institutions (that is, recurrent social relationships regulated by legal rules and social norms) shaping the focal employment relationship and labour outcomes. This systems perspective is useful for analysing the different elements of a governance infrastructure and their interrelationships and outcomes.

Rapid expansion of GVCs has, at least partly, moved the regulation of labour from national industrial relations systems to the transnational realm (Hyman 1999). Labour regulation in GVCs comprises not only multiple employers – buyers based mainly in developed countries and suppliers located mainly in developing countries – but also worker representatives, non-governmental organizations (NGOs) and unions at the national and international levels. International labour Conventions have been layered on top of varying national and industry-specific systems. In this regard, the ILO has played a pivotal role in facilitating the development and ratification of labour Conventions by nation states,<sup>1</sup> but also as

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<sup>1</sup> For information about the ratification of labour Conventions by Bangladesh, see [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200\\_COUNTRY\\_ID:103500](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103500).

a representative and legitimate public authority that gives support to private regulatory initiatives (Niforou 2014; Thomas 2021). In addition, international institutions like the United Nations (UN), the Organisation for Economic Cooperation and Development (OECD) and the European Union (EU) have become increasingly important in developing norms, guidelines and procedures to complement existing legislation, government policies and various forms of private regulation, including codes of conduct (see, for example, OECD 2018).

Several studies suggest that particular antecedents (for example, social movement pressure and union power) and configurations of public and private regulation (for example, strong state support and formal coordination) in favourable political economic circumstances facilitate compliance with, and enforcement of, labour standards as defined by national governments or international norms. Locke, Rissing and Pal's (2013) study of electronics suppliers shows that where government regulation is relatively strong it complements private efforts to regulate labour standards in supplier factories, whereas weaker state regulation casts private regulation in a substitute role. Different forms of regulation can complement one another without being formally coordinated (Amengual 2010). Formal coordination, stricter regulation and better enforcement and compliance are more likely where union pressure is exerted. Amengual and Chirot (2016), for instance, found that in Indonesia pressure from local unions with support from external stakeholders (in this case, ILO officials) meant that rules were interpreted in ways that circumscribed employer behaviour. Bartley and Egels-Zandén (2015) also emphasize union influence, and Thomas (2021) shows that Sri Lankan tea workers were able to leverage their structural, associational and institutional power using ILO Conventions, advice and training to collectively bargain with employers and obtain government support for decent work. Conversely, Bair (2017) indicates that, without union influence in global industry dynamics, local labour regulation is likely to be weakened.

The multidimensional LGS concept enables empirical assessment of these different institutional configurations and their interacting elements over a particular period, pointing to changes that encourage labour outcomes consistent with international labour standards. Institutions regulating work in supply chains differ along several dimensions (for an overview, see Berliner et al. 2015). Their scope varies from local (narrow) to global (wide) and can include first-tier suppliers only or the entire supply chain. Institutions will differ in number and type (for example, governments, lead firms, buyer intermediaries, suppliers, trade unions, auditors and other stakeholders) across supply chains. This diversity contributes to different forms of regulation that may combine in various ways: public and private, applying to individual and/or collective production units at a variety of levels (local, national, regional and global). Institutional relations (and associated logics of action) may vary in terms of (a) strength (for example, private and public regulation may be strongly or weakly coordinated depending on the extent of agreement on regulation and its implementation); (b) explicitness, in particular in that the relationship may be documented or remain informal; (c) structure of coordination, which may be authoritarian (top-down) or democratic – or there may be no coordination at all; and (d) the character of coordination, that is, whether the objectives of the institutions are complementary, conflictual or substitutive.

Changes external to the LGS are likely to impact on one or more dimensions of this system, leading to varying labour outcomes in first-tier supplier factories. Procedural outcomes encompass formal participation rights through unions and collective bargaining, worker “voice” via consultative mechanisms, and informal treatment of workers by management. Formal participation procedural rights are especially important because they enable substantive outcomes such as wages, working hours, health and safety and other working conditions to be realized in line with international standards and norms promoted by the ILO and other international organizations.

The LGS concept only applies to the formal labour market. Sweatshops that typically serve the local market or occasionally subcontract to larger export factories are characterized by informal employment and associated with labour outcomes that are substantially below international standards (Dewey 2018). These workplaces lie outside our focus, which is on larger, export-oriented factories in Bangladesh. Accordingly, table 1 refers to a “weak” LGS ideal type in the formal economy, associated with substandard labour outcomes, contrasted with the “strong” ideal type that facilitates favourable, sustainable labour outcomes.

A weak LGS includes only a small proportion of production units in the supply chain and so regulates few suppliers. It is likely where lead firms source mainly via agents or other intermediaries who pay little or no attention to labour regulation. Under these conditions, lead firms absolve themselves of responsibility for upholding labour standards and turn a blind eye to labour abuses in suppliers’ factories. Consequently, regulation is left to individual suppliers, whose employment relations are formally subject to local regulation. However, weak enforcement may ensue because government agencies lack motivation or resources or because the State prioritizes attracting foreign investment over upholding labour rights. Against a background of ineffective labour law enforcement and without buyer support for labour regulation, individual suppliers experience limited or no stakeholder pressure. The resultant weak coordination remains informal and implicit. Regulation is monopolized by supplier management and, under competitive pressure from buyers, labour outcomes will reflect management’s objectives: unilateral control with little or no procedural opportunities for worker voice, coupled with low wages and substandard employment conditions.

In contrast, a strong LGS includes all firms in the supply chain and spans many organizations and institutions of various types, including lead firms, supplier factories, international and national unions and NGOs. The governance form is collective, involving negotiation between representative organizations. This includes governments in buyer countries that provide trade or aid conditional on supplier countries meeting minimum labour standards and that commit to enforcing international norms in buyers’ GVCs. Governments in supplier countries are expected to enforce domestic labour law and support international norms in local factories. Institutional relations are highly coordinated by considerable knowledge exchange and frequent discussion among the LGS’s institutional members. Decisions (on types of inducements and deterrents to promote member solidarity, for instance) and rules (for example, on remediating disputes) are codified, explicitness promoting common norms and enforceability. Decisions are taken by discussion that favours stakeholder inclusiveness and

**Table 1. Weak and strong ideal types of labour governance system**

LGS dimension	Weak	Strong
Institutional characteristics		
Scope of regulation	Narrow	Wide
Number of institutions	Few	Several
Type of institution	Individual: firms only	Multiple: firms, unions and NGOs
Form of regulation		
Public, multiple organizations	Yes, law not enforced	Yes, at various levels; includes trade agreements
Private, single organization	Yes	No
Private, multiple organizations	No	Yes (collective bargaining)
Institutional relations (coordination)		
Strength of agreement	Very limited	High
Explicitness of rules	Low, implicit	High, explicit
Structure of coordination	Authoritarian	Democratic
Character of coordination	Conflictual	Consensual
Labour outcomes		
Procedural, e.g. worker representation	Weak	Strong
Substantive, e.g. pay, working conditions	Below international standards	At or above international standards

Source: Authors' compilation.

limited power inequality, while negotiation aims to achieve consensus and hence ongoing commitment to LGS processes and outcomes. This strong type of LGS yields the best possible labour outcomes given prevailing financial and product market contexts.

When one looks at garment supply chains, hybrid forms of LGS resulting in mixed levels of labour outcomes are common. Variations in form will mainly reflect differences in producer country institutional conditions, factory size and the extent to which suppliers are regarded by major buyers as core or peripheral. Furthermore, LGSs are dynamic, responding to changes in union or consumer pressure (for example, Reinecke and Donaghey 2015; Zajak 2017), regulatory reforms in lead firm countries (Evans 2020), or sporadic labour protests (Anner 2015). Often such changes occur as separate developments, but there have been instances of positive spillover effects across regulatory initiatives, strengthening collective action at multiple levels in order to improve labour outcomes (Ashwin et al. 2020). Before the Rana Plaza disaster, the garment industry LGS in Bangladesh was weak, with limited national labour legislation and desultory enforcement. Codes of conduct of questionable effectiveness comprised the main form of regulation and private and public regulation were largely uncoordinated (Rahman 2014). The factory building collapse was a focusing event that triggered system changes in the LGS (Anner, Bair and Blasi 2013; Donaghey and Reinecke 2018; Schuessler, Frenkel and Wright 2019). Here we examine whether this focusing event strengthened this LGS and discuss whether the COVID-19 pandemic could act as a similar trigger for LGS reform.

### 3. The changing Bangladeshi garment industry labour governance system

We draw on data collected mainly in 2016–17 as part of a comparative research project that was finalized in 2019 (see Schuessler et al. 2019). The project focused on garment GVC regulation and provided data on lead firms (79 management interviews) from four advanced countries (Australia, Germany, Sweden and the United Kingdom of Great Britain and Northern Ireland), and supplier factories (survey of 152 managers) and workers (survey of 1,500 workers and several focus groups) in Bangladesh. A key aim was to identify those LGS elements that combined to perpetuate weakness and those that contributed to a stronger LGS. In addition, we refer to research conducted by others in discussing the inter-relationships between the different elements of our LGS typology and the impact of the COVID-19 pandemic.

#### 3.1. Institutional characteristics of the LGS in Bangladesh in 2019

Although the garment industry transcends national borders, our focus is on the LGS that regulates labour in Bangladesh's export factories. This LGS pertains to the larger factories exporting to Western buyers and excludes factories that supply fabric and accessories, which include many smaller, informally organized production units. The LGS is thus limited in scope.

Participating institutions include several representative organizations operating at different levels. At the local and national levels these comprise trade unions, NGOs, the two major garment industry employer organizations – the Bangladesh Garment Manufacturers and Exporters Association (BGMEA) and the Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA) – and the Government of Bangladesh and its agencies. These government agencies include the Ministry of Labour and Employment, the Department of Inspection for Factories and Establishments (DIFE), the judiciary and the police. At the international level the participants are the lead firms and the organizations to which they are affiliated, international unions (IndustriALL and UniGlobal), NGOs (for example, the Clean Clothes Campaign), the ILO and other international institutions, and foreign governments, especially the EU and its Member States and the United States of America.

As indicated in table 2, the LGS includes three types of regulation. First, Bangladesh has a public, legal framework for labour regulation. Of the ILO's eight core labour Conventions, the Government of Bangladesh has ratified all but the Minimum Age Convention, 1973 (No. 138). However, it has not ratified two thirds of all the ILO Conventions, including the recent Violence and Harassment Convention, 2019 (No. 190).<sup>2</sup> Furthermore, in 2019 enforcement of extant Bangladeshi labour law remained weak and this was a major fact attracting buyers to Bangladesh. The Bangladesh Labour Act 2006, regulates contracts of employment and other work-related matters, including worker consultation,

<sup>2</sup> See note 1.

**Table 2. The garment export labour governance system in Bangladesh, 2019**

LGS dimension	Bangladesh garment exports
<b>Institutional characteristics</b>	
Scope of regulations	Limited to first-tier export factories
Number of institutions	Several
Type of institution	Multiple: firms, unions and NGOs
<b>Form of regulation</b>	
Public, multiple organizations	Yes, labour law and trade agreements
Private, single organization	Yes, codes and auditing
Private, collective	Yes, Accord and Alliance
<b>Institutional relations (coordination)</b>	
Strength of agreement	Low, increasing
Explicitness of rules	Low, increasing
Structure of coordination	Mainly authoritarian (attempt at social dialogue by ILO)
Character of coordination	Weak complementarity, even active undermining
<b>Labour outcomes</b>	
Procedural, e.g. worker representation and treatment	Weak but improving via worker participation committees; anti-unionism remains despite change in regulations; presence of abuse but improved management behaviour
Substantive, e.g. pay, working conditions	Wages higher but below living wage; working hours not effectively regulated; safety and opportunities for consultation improved

Source: Authors' compilation.

trade unions, wage determination and dispute settlement. The Act was amended in 2013, following the Rana Plaza disaster, and implementation regulations were introduced in 2015. Changes imposed new safety precautions, serious accident reporting by factory inspectors, the establishment of health centres in large factories (5,000 or more employees), and improvements in workers' death benefits. The number of factory inspectors was increased but remained inadequate. The new regulations strengthened worker participation committees (WPCs): workers' representatives in factories employing more than 50 workers had to be elected by secret employee ballot and committee meetings had to be held at least six times a year (Manzur et al. 2017). Additional amendments to the 2006 Act were intended to facilitate union registration and collective bargaining (Rubya 2015). However, the Government did little to implement these changes and avoided prosecuting employers for anti-union practices in 2016 and 2017, including violence against union leaders and dismissals of union members (Anner 2018; Chowdhury 2017). Unions remained weak at around 3 per cent density and collective bargaining was non-existent. Worker discontent was occasionally explosively expressed in the form of large-scale strikes, followed by violent repression, as happened in 2019 (Alamgir and Banerjee 2019; Anner 2018).

The reluctance of the Government of Bangladesh to enforce labour regulation reflects dependence on garment employers for political and economic support.

This situation persisted despite attempts by Western governments to pressure the Government of Bangladesh through trade-related agreements. For example, in the immediate aftermath of Rana Plaza, the US Government responded to NGO and union pressure and suspended several of Bangladesh's advantages under the Generalized System of Preferences (GSP), a trade agreement that affected goods other than garments. Soon afterwards, the EU and the ILO (later joined by the United States and Canada) negotiated a "Sustainability Compact" requiring improvements in labour standards. The Compact mandated a national factory inspection programme known as the National Initiative. Overall, the implementation and enforcement of the Compact remained weak, and the Government of Bangladesh learned that breaches did not result in economic sanctions (Vogt 2017). Meanwhile, foreign governments were funding factory-based schemes to improve selected labour outcomes.<sup>3</sup> Western governments also indicated that lead firms should take labour standards and human rights in their supply chains more seriously, though initiatives like the National Action Plans for implementing the UN Guiding Principles on Business and Human Rights (hereafter, UN Guiding Principles) were largely voluntary and limited in scope to larger and publicly listed companies. The EU Parliament promoted mandatory due diligence legislation,<sup>4</sup> and national supply chain laws along the lines of the French 2017 duty of care law<sup>5</sup> were debated in Germany, the Netherlands and Switzerland. The ILO, for its part, established a programme to improve working conditions and labour relations in the garment industry.<sup>6</sup>

The second type of regulation is private regulation within individual organizations. In response to changing public regulation and pressure from stakeholders and the media after the Rana Plaza disaster, lead firms revised their supply chain policies and practices (Schuessler, Frenkel and Wright 2019). They reduced their numbers of suppliers and began working more closely with preferred suppliers. Extensive third-party auditing was complemented by more intense factory monitoring. Factory managers in the survey reported an average of slightly more than four codes per factory and nine audit visits a year by lead firms or third-party auditors (Schuessler et al. 2019, 16–17). Yet, as Anner (2018) emphasizes, increased auditing and compliance measures tend to correlate with falling purchasing prices, hence a dual squeeze on factory managers, who then seek reductions in labour costs. In addition, lead firms expanded their "regulatory portfolio" towards capacity-building and political advocacy. However, a compliance focus based on auditing rather than a commitment-oriented approach based on capacity-building to improve labour outcomes still dominated (Locke, Amengual and Mangla 2009; Oka, Egels-Zandén and Alexander 2020).

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<sup>3</sup> For example, the Danish Government has targeted occupational safety and health (OSH), including improving OSH capacity-building in the DIFE, especially regarding inspector effectiveness and the dissemination of information.

<sup>4</sup> See [https://ec.europa.eu/growth/sectors/raw-materials/due-diligence-ready/explained\\_en](https://ec.europa.eu/growth/sectors/raw-materials/due-diligence-ready/explained_en).

<sup>5</sup> Law No. 2017-399 of 27 March 2017 concerning the duty of care of parent and subcontracting companies.

<sup>6</sup> See [https://www.ilo.org/dhaka/Whatwedo/Projects/safer-garment-industry-in-bangladesh/WCMS\\_226530/lang-en/index.htm](https://www.ilo.org/dhaka/Whatwedo/Projects/safer-garment-industry-in-bangladesh/WCMS_226530/lang-en/index.htm).



The third type of regulation concerns collective forms of private regulation. The Rana Plaza disaster highlighted the limitations of public regulation and private individual regulation, particularly regarding building safety. This issue was addressed through a new private, collective form of regulation represented by two institutions: the Accord on Fire and Building Safety in Bangladesh (Accord) and the Alliance for Bangladesh Worker Safety (Alliance). The Accord was a fixed-term agreement (2013–18), and attempts to extend it resulted in only a few months' prolongation owing to resistance by the Bangladeshi industry and by government elites (Bair, Anner and Blasi 2020; Bartley 2021). These stakeholders were instrumental in establishing the Ready-Made Garments (RMG) Sustainability Council (RSC) that replaced the Accord in 2020. Funded by more than 200 lead firm members, mainly from European countries, the Accord covered some 1,650 factories that produced entirely or mainly for Accord member firms. Disputes were subject to legally binding arbitration. Unlike with codes of conduct, factory owners were accountable through an inspection and remediation process whose results were publicly available. In addition, the Accord included requirements that encouraged factory–lead-firm collaboration to improve safety (Scheper 2017). The Alliance, supported by 29 mainly US firms, was a five-year (2013–18) alternative to the Accord that avoided bargaining with unions in favour of consultation (Donaghey and Reinecke 2018). Because of its relatively small size and overlap with the Accord – around a quarter of Alliance factories also supplied Accord lead firms – the Alliance worked closely with Accord officials, playing a subsidiary role in improving building and worker safety. Despite its narrow mandate to improve building safety, the Accord had attempted to strengthen worker voice directly, through safety committees, and indirectly, by providing a “shadow of protection” (Zajak 2017, 1009) for workers reporting safety concerns (Bair, Anner and Blasi 2020).

### 3.2. Institutional relations

The UN Guiding Principles request governments to “consider a smart mix of measures – national and international, mandatory and voluntary – to foster business respect for human rights” (United Nations 2011, 5). Such a combination was absent from the garment LGS in Bangladesh in 2019. Although relationships between the regulatory forms outlined above and between the principal participating actors had been changing since the Rana Plaza disaster, their basic features, as summarized in table 2, remained the same: weak coordination with few explicit rules, mainly top-down and lacking in complementarity.

With a continued strong focus on voluntary action by lead firms and suppliers, LGS “strength” remained low, but had been increasing in some areas, especially regarding building safety, where initiatives like the Accord and the Alliance significantly contributed to increasing transparency and awareness of legal and code of conduct requirements among factory managers and workers. However, a significant public policy gap remained, reflected in absent or weak supply chain labour legislation in most Western countries, coupled with limited ambition to sanction violations of labour standards by withdrawing trade preferences and with very limited enforcement in Bangladesh.

The LGS became more explicit through the reforms made to the Bangladesh Labour Act 2006, outlined above, the emerging UN Guiding Principles norms relating to lead firms, and compliance and transparency procedures promoted by the OECD. These changes have been complemented by dialogue between multiple stakeholders. Consequently, factory managers and workers report stronger awareness of safety requirements and labour rights (Frenkel, Rahman and Rahman, unpublished; Kabeer, Huq and Sulaiman 2020).

The structure of coordination was generally hierarchical, such that lead firms, Western governments and other stakeholders required strict compliance with new building safety rules in the Bangladesh garment industry. There was no regular social dialogue forum to bring these actors together with suppliers and worker representatives to resolve problems and develop new regulation strategies. However, the Accord – assisted by the ILO – and the Alliance established and facilitated an ongoing dialogue between lead firm and international union representatives and local organizations, including consultation with NGOs. Supplier representatives were regularly informed about, but were excluded from, Accord and Alliance decision-making. Explicit coordination occurred within the Accord because formal supplier evaluation and remediation efforts were mutually recognized. Although coordination by Accord and Alliance officials with the Government's National Initiative programme was limited, frequent discussions concerning improvements in safety training were promoted by the ILO and facilitated by foreign governments. Because local trade unions and supplier organizations remained weak relative to lead firms, coordination was usually organized by the lead firms in collaboration with the international unions.

This lack of inclusive coordination resulted in weak complementarity among the various initiatives. Lead firms were reported to have shifted resources among different initiatives according to which ones best met the expectations of senior management. Factory managers were required to undergo costly multiple, and sometimes inconsistent, code of conduct audits by lead firms that required stronger coordination and transparency. Public labour regulation remained weakly enforced. The strongest improvements occurred in the area of building safety, where the Accord (together with the Alliance) coordinated factory safety initiatives, encouraged dialogue within and between organizations and contributed to a general climate of improved compliance with international labour standards in garment factories supplying affiliated lead firms (Frenkel, Rahman and Rahman, unpublished). However, it was the extension of this collective, more transparent and worker-empowering form of regulation that the employers and the Government of Bangladesh actively opposed (Bair, Anner and Blasi 2020), with tacit support from buyers and Western governments (Vogt 2017). Consequently, the LGS remained piecemeal, inconsistent and incoherent.

### 3.3. Labour outcomes

Drawing on data from Kabeer, Huq and Sulaiman (2019 and 2020), table 3 summarizes specific procedural and substantive outcomes in the post-Rana-Plaza garment LGS in Bangladesh, based on workers' perceptions. Here we refer not

**Table 3. Labour outcomes: Job aspects and workers' perception of change since the Rana Plaza disaster**

Job aspects	Worker satisfaction and responses	Evaluation	Perceived changes since Rana Plaza (%)		
			Improved	No change	Worsened
Substantive outcomes					
Building safety	94.3% satisfied	Considerable remediation	85.0	0.3	14.7
Work environment, safety and health	93.5% satisfied; 90% reported presence of safety committee	As above	86.5	13.2	0.3
Job security	97% permanent status; tenure 3.6 years; 58.9% satisfied	Not especially precarious	47.4	41.5	11.1
Earnings	8993 taka (2017); 45.6% satisfied	Based on ISEAL Alliance (2017), between 66% and 54.6% of the living wage depending on worker residence	58.7	36.8	4.5
Hours of work / opportunity for overtime	60/week, sometimes more; 29.1% satisfied	Long working hours possibly within legal limit	18.7	41.2	40.1
Procedural outcomes					
Sexual harassment	1.2% often	Infrequent	13.0	86.3	0.7
Verbal abuse	81.4% often	Frequent			
Management behaviour	62.1% satisfied	Bureaucratic	56.3	38.3	5.4
Opportunity to complain / WPC functioning	64.7% satisfied; 80.3% reported electing representatives to WPCs and 64.8% perceive WPCs as effective	WPCs substituting for unions (4.3% stated union present in factory); consultation in lieu of collective bargaining	68.4	30.1	1.5

Notes: Percentage "satisfied" refers to the proportion of workers who reported being satisfied on a three-point scale (satisfied, neither satisfied nor dissatisfied, very dissatisfied). Exchange rate: 80.2 Bangladeshi taka = US\$1.00. Respondents were not asked about change in hours of work since the Rana Plaza disaster, or about change in verbal abuse. Rather, they were asked about change in opportunities for overtime and change regarding sexual harassment, respectively. Similarly, they were asked about change in opportunity to complain but not about change in WPC functioning.

Source: Adapted from Kabeer, Huq and Sulaiman (2019 and 2020).

only to codified outcomes such as formal worker representation, wages and hours of work but also to uncodified matters of procedural and interactional justice. The table indicates in descending order how much workers valued each of the first four aspects (column 2) and includes a corresponding evaluation (column 3) and a measurement of the workers' perception of change since the Rana Plaza disaster (columns 4 to 6).

Positive aspects included building safety and the work environment, reflecting the impact of the Accord and the Alliance. Jobs were not especially insecure, and yet, despite being employed on an ongoing basis, only around six in ten workers were satisfied with their job tenure. Several aspects were more problematic, including earnings, which were well above the (very low) legal minimum but below the estimated living wage, and working hours, which were very long. Workers claimed that when they were under pressure their overtime hours (mean of 3.3 hours/day) exceeded the legal limit, but we do not know how frequently this occurred. Although the evidence is discouraging, it appears that there was some improvement in procedural outcomes. Verbal abuse, mainly by supervisors, was frequently experienced, whereas sexual harassment is difficult to gauge and may have been underreported (Walby 2005). Only around six in ten workers were satisfied with management behaviour, which was mainly perceived as rule bound (49.3 per cent) or characterized by unilateral domination (27.8 per cent) rather than as caring (14.3 per cent) or consultative (8.6 per cent). However, almost two thirds of workers reported having opportunities to complain. Relevant here is that 71 per cent of workers claimed knowledge of company codes of conduct compared with 40 per cent who reported knowledge of the labour laws. Despite virtually no union presence in the factories and no collective bargaining, a large proportion of workers claimed that WPCs were functioning with elected worker representatives, and nearly two thirds judged these to be effective.

Regarding changes over time, a clearer, more positive picture of labour outcomes emerges, albeit from a very low pre-Rana-Plaza base. In five of the eight job aspects included in table 3, more than half of worker respondents reported an improvement in their factory since the Rana Plaza disaster. Only regarding overtime opportunities did a sizeable proportion of workers (40 per cent) report a deterioration. Apart from this, in the areas in which less than two thirds of respondents reported improvements – job security, earnings, sexual harassment and management behaviour – a large minority reported “no change”.

Kabeer, Huq and Sulaiman (2020) indicate that positive changes were mainly associated with the concerted efforts of the Accord and the Alliance. Workers in factories affiliated with these initiatives were found to be significantly more likely to report improvements in building safety and the work environment. Similar results were obtained for opportunities for complaints about sexual harassment, indicating that the initiatives' emphasis on improving safety was having a ripple effect by creating a wider climate of improved relationships with the factory workforce compared with relationships in non-affiliated factories. No significant differences were found for earnings, overtime hours and job security, all aspects that are especially sensitive to buyer demand and production requirements.

## 4. Discussion: COVID-19 a focusing event for LGS reform?

Since the Rana Plaza disaster in 2013, the garment industry LGS in Bangladesh has become more complex. The number of public and private regulations and the scope of the LGS have increased, particularly regarding building safety and workers' health and safety. Our study found that the LGS was strongest in this area because of the collective, concerted efforts of lead firms, global union federations and other stakeholders and because the Accord raised workers' safety awareness and capability. Yet, low wages, long working hours and abuse remained major problems in a generally weak LGS. Since this is typical of the garment industry more generally, we have to look elsewhere for an example of a strong LGS. A likely candidate is the Sri Lankan tea industry LGS, which comprises a robust legal framework and a collective agreement between 23 companies and three unions and receives ongoing ILO support and government assistance where wage negotiations reach an impasse (Thomas 2021). Strong coordination is a feature of both the employers' organizations and the unions. Unions wield considerable power, in part related to product characteristics (high quality, export value and perishability) and political influence based on ethnic solidarity.

In 2020, the garment industry experienced the impact of COVID-19. Bangladeshi garment exports plummeted as lead firms cancelled, postponed and delayed payment for orders (Anner 2020; ILO 2020a). Some large retailers went out of business. Under pressure from unions and NGOs, major lead firms agreed to pay for existing orders while others sought discounts from suppliers or avoided liability via a *force majeure* clause in their contract. Meanwhile, after a one-month government-imposed lockdown in May 2020, factories were opened according to official health guidelines and ran at 55 per cent capacity. Between December 2019 and September 2020 an estimated 11 per cent of workers lost their jobs and average wages declined by around 8 per cent (CCC 2021). Workers protested and on 31 March 2020 the Government of Bangladesh announced a US\$595 million stimulus package and a 2 per cent interest on loans to factory owners for the payment of workers' wages for up to three months (Rahman, forthcoming). However, take-up has been slow, especially among small factory owners.

Lead firms have been reviewing their business strategies and supply chain operations (BoF and McKinsey 2020). Aiming to develop more resilient supply chains that will limit operational and reputational risks, firms have accelerated a trend that emerged after Rana Plaza of forging closer ties with fewer, larger suppliers (Schuessler et al. 2019). Travel restrictions are encouraging more reliance on code monitoring by local professionals, possibly supported by new technology (Rankin 2020). In addition, there is discussion of artificial intelligence and 3D printing that would bring garment manufacturing closer to points of sale, thereby posing a longer-term threat to garment industry jobs in Bangladesh. Meanwhile, Viet Nam, having weathered the first wave of the COVID-19 pandemic, has rapidly set about expanding its garment exports, overtaking Bangladesh in 2020 as the world's second-largest clothing-exporting

country (Ishty and Tasneem 2020). This has alarmed Bangladeshi suppliers, encouraging employer solidarity and a stronger desire to introduce new technology that will enable environmentally sustainable production of more complex, higher-value garments.

Overall, these developments – particularly order cancellations and delayed payments – have created “apprehension” and “uncertainty” (BoF and McKinsey 2020) among buyers and suppliers, which work against building the trust and cooperation needed to achieve a major change in the LGS (ILO 2020b). However, following the widespread introduction of COVID-19 vaccination programmes, this survival climate could be replaced by a strong desire for growth, which would open a window of opportunity for LGS reform. Discussions involving the main LGS stakeholders will be needed to address the root causes of “indecent work” on both the supply and demand sides of GVCs (LeBaron 2021). Solutions include a systematic, realistic increase in purchasing prices, a factory upgrading programme, and strengthening of worker representation.

First, in buyer countries, national legislation should aim to establish a floor below which labour costs in supply chains should not fall. This is especially important in view of the adverse employment effects of the COVID-19 pandemic. This legislation should include extraterritorial lead firm liability for supplier violation of international labour standards (Bartley 2018). Various initiatives are being debated by European governments, but remain contested by buyers. Such legislative action is urgently needed to leverage current private regulatory initiatives such as the multi-stakeholder Action, Collaboration, Transformation (ACT) initiative to establish a living wage in textile and garment supply chains (Ashwin et al. 2020) or the German Partnership for Sustainable Textiles (Grimm 2019). The latter aims to institutionalize industry-level collective bargaining and develop guidelines for facilitating transparent, responsible purchasing. Exemplary rules for public procurement and transparent labelling would complement the legislation, encouraging changes in consumption behaviour (Lohmeyer and Schuessler 2018). Under such regulation, all relevant international garment buyers in the buyer country should contract with Bangladeshi suppliers at prices meeting agreed minimum labour standards. Lead firms should integrate corporate social responsibility (CSR) objectives into their purchasing practices and should reward suppliers that consistently maintain high labour standards with longer-term, higher-volume contracts and engagement in joint economic and social upgrading initiatives that might attract foreign government investment (Barrientos, Gereffi and Rossi 2011; Amengual, Distelhorst and Tobin 2020). Such policies could be supported by factory-level reforms described below. International trade agreements could assist by offering buyers tax reductions for exceeding GVC governance standards, and by denying suppliers access to tariff concessions where labour standards are violated. Such changes will probably be resisted by lead firms anxious to generate orders in a depressed market while governments are preoccupied with improving the domestic economy and avoiding further unemployment. Consumers, too, may be more concerned with maintaining their own well-being than expressing solidarity with workers in distant supply chains. At the same time, COVID-19 has triggered NGO and union opposition and drawn consumers’ attention to the plight of garment workers in supply chains. Whether

or not the COVID-19 pandemic will be a focusing event leading to pressure for change, in a way similar to the Rana Plaza disaster, will depend on continued stakeholder action (Schuessler, Frenkel and Wright 2019).

Second, in order to meet price and quality requirements and uphold agreed labour standards, factories will need to upgrade their capability to maintain or reduce unit labour costs. This will require a factory-upgrading programme in Bangladesh, perhaps supported by soft loans from the International Finance Corporation (World Bank Group) and grants from foreign governments, guided by the multilevel dialogue framework mentioned below. The programme would emphasize improvements in three areas: factory business strategy, particularly regarding new product markets; buyer relationships that provide for fair prices; and productivity-raising processes based on advanced management techniques and worker–management consultation, both supported by relevant training and stronger collective worker voice mechanisms at the factory level, which the Better Work programme could help to improve (Pike 2020).

Third, factory labour relations require substantial change. Under the auspices of multilevel dialogue, a stakeholder commission, chaired by the ILO, should be established to provide a collaborative framework for change. Factory employers need to be persuaded of the advantages of collective bargaining, supported by workplace consultation in the form of effective WPCs and safety committees. Single workplace agreements and complementary monitoring procedures need to replace multiple, lead-firm-controlled codes of conduct and monitoring processes. If bargaining and consultation are to be effective, unions need restructuring, beginning with a dialogue on the merits and disadvantages of various bases of union structure (workplace, industry or political), including the question of coordination with global union federations like IndustriALL. The latter has played an important role in campaigning against irresponsible behaviour by lead firms during the COVID-19 pandemic (for example, in the #PayUp campaign) and in forging agreements with lead firms and local industry actors to avoid layoffs and to pay salaries for garment workers (ILO 2020b). The pandemic has spurred the use of digital tools and related practices, which has proved useful in facilitating bottom-up worker mobilization (see the “ExChains” initiative discussed by Lohmeyer, Schuessler and Helfen 2018) and may augment worker power in the future (Helmerich, Raj-Reichert and Zajak 2021).

## 5. Conclusion

Although there have been some advances since the focusing event of the Rana Plaza disaster in 2013, there continue to be many gaps in Bangladesh’s garment industry LGS that leave workers acutely vulnerable to exploitative working conditions and loss of livelihood. The systemic problems in GVC governance have persisted in the COVID-19 era, and factory employment, the focal point of governance, has been called into question. New public and private institutions need to prioritize industrial growth based on fairness in relationships between buyers and suppliers, efficient suppliers committed to social and environmental sustainability, and strengthening worker voice. Major change of this kind is unlikely so long as lead firms, suppliers and workers remain preoccupied with

economic survival as a consequence of the COVID-19 pandemic. However, when the pandemic subsides it may prove to be a focusing event, opening a window of opportunity for stakeholders and policymakers to forge a strong LGS that will regulate the garment GVC in Bangladesh more effectively.

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