



For workers' rights. For better business.



A STUDY REPORT

ON

ASSESSMENT OF PAST AND CURRENT INITIATIVES ON MILL WORKERS' RIGHTS IN TAMILNADU, INDIA



Prepared by

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About this Report

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This report is an outcome of the study conducted by Ethical Trading Initiative (ETI) and Traidcraft (Traidcraft Services India Pvt. Ltd.), which draws on the findings of a 3 -month long research study to extract lessons from different initiatives undertaken in the Tamilnadu region in addressing the exploitative employment practices, including the Sumangali Scheme, and capture knowledge gaps and potential opportunities for improvement to feed into the design of future projects aiming to ethical recruitment and retention of young women into the sector in enhancing workers' rights in the region.

The findings are based on an in-depth desk top research of 10 different initiatives including ETI's Tamilnadu Multi-Stakeholder Initiative and other MSIs, as well as over 40 interviews, with individuals, across a wide range of stakeholders including INGOs, Donors, corporate brands operating in the region (both previously and currently), local organisations, Trade Unions, Government, Industry Associations as well as women workers.

While the research was primarily conducted by Traidcraft who also authored this Report, ETI provided necessary financial and technical support in conducting the research. The research Team from Traidcraft includes:

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Acronyms

ETI	Ethical Trading Initiative
GAP	Gap Inc.
H & M	Hennes & Mauritz (h & M) Brand
ARISA	Advocating Rights In South Asia
ILO	International Labour Organisation
KII	Key Informant Interview
FGD	Focus Group Discussion
CSO	Civil Society Organisations
NGO	Non-Governmental Organisation
INGO	International Non-Governmental Organisation
TNMSI	Tamil Nadu – Multi Stakeholder Initiative
MSI - TN	Multi Stakeholder Initiative – Tamil Nadu
TN	Tamil Nadu
PIC	Partners In Change
FEMNET	African Women’s Development and Communication Network
SAVE	Social Awareness and Voluntary Organisation
READ	Rural Education and Action Development
PF/ESI	Provident Fund/Employees State Insurance
ICC	Internal Complaints Committee
SIMA	Southern India Mills’ Association
TASMA	Tamilnadu Spinning Mills Association
ToR	Terms Of Reference
PACE	Personal Advancement and Career Enhancement
TNA	Tamil Nadu Alliance
SWC	State Women’s Commission
LCG	Local Consultation Group
TU	Trade Union
MSI	Multi Stakeholder Initiative
DDU-GKY	Deen Dayal Upadhyaya Grameen Kaushalya Yojana
MoRD	Ministry of Rural Development, Government of India
B&HR	Business & Human Rights

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Executive Summary

The Tamil Nadu garment and textile sector, and the human rights abuses within it, have been a global topic of discussion for over a decade now. Reports of violations of workers' rights are a grave concern for all stakeholders associated with the industry. Reports by several international organizations¹ have critically analyzed the situation of workers and validated the prevalence of widespread violations of workers' rights. The prevalence of forced labor (as seen in the Sumangali² scheme), child labour, poor working conditions, the absence of freedom of association & movement and the lack of grievance redressal mechanisms have been highlighted in these reports. The social and economic disadvantages experienced by women workers from socially backward communities and the acute power imbalance in their relationship with their employers leading to discriminatory employment practices have been documented.

Over the last decade, the sector has seen several efforts by national and international NGOs, civil society actors and unions to address these rights violations. There have been huge investments in the form of funding from donors to help carry out various initiatives. Some examples of such initiatives include: *ETI's Tamil Nadu Multi-stakeholder (TNMS) Nalam programme*, The Partnership Initiative Tamil Nadu as part of Partnership for Sustainable Textiles of German BMZ, The Dutch Agreement on Sustainable Garments and Textile (AGT), The Freedom Fund's Hotspot project and many more.

While each of these initiatives have contributed to positive improvements in individual workplaces and across the sector, reports of rights violations continue to surface. Given the situation, Ethical Trading Initiative (ETI) and Traidcraft collaborated to undertake the Research Study and take stock of the overall landscape to document positive changes, learnings, knowledge gaps and a suggested course of action for future initiatives. The study was therefore planned and designed to *extract lessons from different initiatives and capture knowledge gaps and potential opportunities for improvement to feed into the design of future projects intended to enhance workers' rights in the region*. The findings of the study are expected to inform the approach of organisations in furthering their efforts to support and strengthen local mechanisms for labour rights improvements and facilitate dialogue among industry, industry associations, international buyers, and the local civil society.

Methodology: The methodology adopted for the research was primarily qualitative in nature. The study has been divided into two components. The first component contains a review of the scope and objectives of some of the most significant initiatives and the methodologies and outcomes of these initiatives. This was done using secondary research tools and methods. In the second component, primary research tools and methods were employed to document stakeholder perspectives from the sector.

Findings of the Study: Research component 1

The information collected through Secondary Research techniques are analyzed with respect to specific questions set in ToR. Systematic documentation of various initiatives and an analysis of this literature revealed that most initiatives started largely in response to concerning reports of labour rights violations in the textile sector (both spinning mills and garment factories). Young women workers employed under bonded and forced labour conditions, commonly referred to as the 'Sumangali' scheme, and those living in hostels (including many managed by the employer) was identified as an issue in many cases.

¹ such as ARISA, Corporate Accountability Research (Australian University), ILO

² Under Sumangali Scheme, young women are hired on contract for up to five years. During their contract they earn minimal wages and at the end are given a lump sum to pay for a dowry.

While some initiatives engaged with workers and the community to empower them, others tried to build the capacities of the industry and factory management. Certain other initiatives were geared towards influencing legislative policies to align with workers. There were also a few that worked to achieve reforms in all three aspects by adopting multi-pronged approaches. The analysis also clearly indicated that initiatives led by each specific category of stakeholders had distinct objectives and methodology. For example, groups like Gethu (a workers' think tank) has been working to create knowledge to influence policy making spaces in a systematic way, while, in contrast, Brand led initiatives have mostly focused on workers well-being programs within factories. Similarly, multi stakeholder initiatives were most invested in starting a process of dialogue between the various stakeholders of the industry.

These initiatives have tried to address a range of issues including the prevalence of the Sumangali Scheme, lack of awareness about rights and entitlements amongst workers, lack of awareness amongst factory management about rightful employment conditions, absence of grievance redressal mechanisms and bridging the trust deficit between CSOs and industry. A range of strategies and approaches were adopted. Most CSO/INGO led initiatives stressed upon a rights-based approach, whereas brands and industry focused largely on the well-being mechanisms for workers. A few initiatives also adopted the **Multistakeholder approach** to address the situation. One such example is the TNMSI, which followed a Tripartite approach. Realising that workers' rights issues are often deep-rooted and widespread and are best tackled through collaborative action, the Ethical Trading Initiative (ETI) has brought together a wide range of stakeholders to address issues of workers exploitation.

Our research indicates that as a result of the efforts made by different initiatives, reasonable progress has been made in addressing labour rights abuses linked to the Sumangali scheme in some sections of the industry, awareness of workers about their rights and entitlements has increased, and factory management is more aware of rightful employment conditions. However, these improvements have been limited to tier 1 factories. Needless to say, other forced labour practices and rights violations are still prevalent in many textile mills and garment factories of Tamilnadu in different forms. There were also limited efforts in these initiatives to ensure rights of workers particularly in terms of freedom of association, freedom of movement, minimum wages, and grievance redressal mechanisms.

Our research also came across reports³ that critically review the Top-Down approach taken by ETI in the TNMSI. According to the report, the programme by ETI as developed in response to ongoing rights violations in the sector in Tamil Nadu took several years to design and its key elements were primarily negotiated and agreed among ETI staff and member organisations in London, rather than agreed through close negotiation with civil society groups in Tamil Nadu.

Research Component 2: Information collected as part of this component using primary research techniques have been analysed and presented under different headings, such as a) effectiveness of Approach and methodology adopted by the initiatives, b) Achievements, c) what are the non-achievements, d) Specific challenges and e) Prevailing gaps. Our research identified many different approaches adopted by initiatives to address the challenges in the industry. These include a 'worker-focused' approach and a 'multi-stakeholder approach'.

Within the worker-focused approach, some initiatives adopted '**prevention mesures**', wherein awareness programs were conducted at the community-level to prevent migration and recruitment of girls and young women under the Sumangali Scheme. The '**curative mesures**' include rescue and rehabilitation of

³ <http://www.indianet.nl/pdf/ForcedLabourTextileGarment.pdf>

bonded workers. However, the approach, which was rather confrontational, contributed to a stressed relationship between CSOs and the industry, wherein the later were seen as 'offenders'. Reports of such cases in the international press had a negative impact on business as many brands pulled out of the accused mills and factories. This gave rise to 'trust deficit' between CSOs and industry making access to the factories and mills extremely difficult for CSOs thereafter.

The complexity of the sector thus laid out the need to work collaboratively with different actors to bring about sustainable change; and this transpired significant innovations in the approaches adopted and led to the **Multi-stakeholder approach**. The Dutch Agreement on Sustainable Garments and Textile in India, the German initiative Partnership for Sustainable Textiles (MSI- TN), TN Multi-stakeholders Initiative by ETI and Freedom Fund are some of the key multistakeholder initiatives implemented in Tamilnadu.

Multiple initiatives in the past, have resulted in improvement in working conditions in the mills and factories (though broadly limited to Tier 1 factories). Positive changes include the legal ban of the Sumangali Scheme leading to significant reduction in child labour and bonded labour, the introduction of the Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014 that helped young women access safe living conditions, improved awareness on their rights and entitlements, reduced the involvement of recruitment agents and improved working condition. Emergence of Tamilnadu Alliance as a major advocacy body, signing an MoU with South India Mills association (SIMA) and releasing of the Code of Conduct by SIMA, have been positive developments in the sector.

However, many gaps still remain. First, changing the mindset of business has not been a key focus of the initiatives – most initiatives have looked at adherence to compliance as a driver of change. Second, previous programmes have failed to foster a unified agenda at the sectoral level which is truly championed by all involved stakeholders. Multiple stakeholders with differing agendas constrained forward movement with a definitive direction. Third, while government institutions are involved in some multistakeholder initiatives, their commitment is missing. Fourth, the initiatives have not been able to keep pace with the changing eco-systems of the industry. The last decade has seen significant changes in the overall labour composition, in the form of a higher proportion of inter-state migrant workers, increased casualisation of workers, involvement of a large number of petty contractors. Intervention plans of most previous programmes have not been able to keep pace with these changes. Fifth, the positive changes achieved by the interventions have been more pronounced in the tier I factories or in those mills that are part of a vertically integrated export-oriented system. These impacts become far less pronounced as one looks at lower tier suppliers as well as those factories and mills that mainly cater to domestic supply chains.

Recommendations for future interventions: The strategic recommendations on areas of future interventions, which follow systematically from the analysis of findings, suggest that a) Future initiatives must include strategies to cope with the changing ecosystem of the industry and adapt their activities to address emerging challenges b) Future initiatives must look beyond tier 1 factories and focus their interventions at lower tier suppliers as well as at factories and mills catering to domestic supply chains, c) Future interventions must focus on strengthening grievance redressal mechanisms across different tiers of factories and mills. Reinforcing the right to association by encouraging unionization can be a powerful tool in this direction.

Last but not the least, considering that the multistakeholder approach seems most suited to bring about sustainable change in the sector; future interventions must invest on fostering a unified common agenda at the overall sectoral level, which is truly championed by all involved stakeholders, towards a greener landscape that would provide the desired impetus for a rightful workspace and a thriving business.

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1. Introduction

1.1. Context and Background

Tamil Nadu is the powerhouse of India's garments and textiles export sector and counts many reputed global brands and retailers among its clients. There are more than 2,000 mills and 4,000 garment factories with around 1.02 million workers employed in Tamil Nadu's garment sector⁴. However, the sector has been under scrutiny for entrenched labour rights abuses, which include wages below minimum wage standards, excessive working hours, poor living conditions in hostels, low levels of personal health awareness, illness caused by exposure to cotton dust and no access to grievance mechanisms, to name a few. Young women workers have been subject to severe labour exploitation, often recruited from India's rural hinterlands to work in the sector. This exploitation is further perpetuated by the widespread adoption of the Sumangali Scheme⁵, an employment practice that encourages bonded labour and forced labour.

Increasing NGO and media reports on entrenched labour rights abuses, particularly of young women workers have become a matter of global concern for all stakeholders who have been putting in enormous efforts and resources to address the situation for over a decade now. Some examples of such initiatives include: *ETI's Tamil Nadu Multi-stakeholder (TNMS) Nalam programme*, The Partnership Initiative Tamil Nadu as part of Partnership for Sustainable Textiles of German BMZ, The Dutch Agreement on Sustainable Garments and Textile (AGT), The Freedom Fund's Hotspot project etc.

While each of these initiatives have specific focus areas, all of them are broadly align towards the reduction of entrenched systemic practices of labour exploitation of workers. Though these efforts have been reported to have brought about several improvements in individual workplaces and across the sector, rights violations continue to surface the landscape. Hence, it is felt relevant, after multiple years of implementation of these initiatives, to assess the key achievements, lessons learnt, gap areas still remaining and a course of action for further collaborative initiatives to address these.

The Tamil Nadu Multi-stakeholder (TNMS) Nalam programme

ETI has established a successful Tamil Nadu Multi-Stakeholder (TNMS) platform in 2013 to address these labour rights issues and subsequently developed and implemented a training programme for women mill workers, supervisory cadres, and senior management personnel. This is a rights-based approach to enhance the employment and recruitment practices in Tamil Nadu textile industry. The objective of the programme is to: "contribute to the elimination of exploitive practices, including the Sumangali scheme, in the textile industry in Southern India by implementing a replicable model that promotes ethical recruitment and retention of young women into the sector." Through an innovative peer-group learning methodology workers learn about their role as workers, good health and safety, rights as workers, and how to discuss concerns with management. The workplace training programme runs for 18 months and is facilitated by ETI's own expert social workers, health, HR and labour law specialists, and covers six training modules: occupational health & safety; understanding self; rights at work; quality of life income and stability; understanding work and role in industry; ownership & responsibility. The programme built trust, expertise and communication skills of workers and supervisors learn how to better communicate.

⁴ Government of Tamil Nadu www.investingintamilnadu.com

⁵ Under Sumangali Scheme, young women are hired on contract for up to five years. During their contract they earn minimal wages and at the end are given a lump sum to pay for a dowry.

Consequently, with the aim to extract lessons from all these initiatives and capture knowledge gaps and potential opportunities for improvement to feed into the design of future projects intended to enhance workers' rights in the region, ETI and Traidcraft collaborated to undertake the Research Study. The findings of the study will inform the approach of organisations in future in their efforts to work more directly on supporting and strengthening local mechanisms for labour rights improvements and facilitate dialogue among Industry, Industry Associations, International Buyers and the local civil society. The learnings could also be used by other initiatives currently active in the region.

1.2. About the Study

1.2.1. *Objective of the Study*

The aim of this research project is to “extract lessons from different initiatives (including ETI’s Tamil Nadu Multi-Stakeholder (TNMS) Nalam programme) funded by various donor agencies and governments globally, which are intended to contribute to the elimination of exploitive practices, and helped in promoting ethical recruitment and retention of young women in the textile industry in Southern India; and capture knowledge gaps and potential opportunities for improvement to feed into the design of future projects aiming to enhance workers' rights in the region”.

1.2.2. *Scope of the Study*

- Through undertaking Desk-top research, provide an overview of the scope and aims behind previous and current labour rights based-initiatives; and provide detailed information on the reasons for establishing the initiative, issues addressed by them, methodology adopted and the outcome of the initiative.
- Map and analyze past and ongoing initiatives conducted in Tamil Nadu to list and evaluate all the different projects and their results, challenges, and gaps.
- Collect information via desk research as well as interviews with different stakeholders such as partner organisations, corporate brands operating in the region (both previously and currently), local organisations, MSIs, Trade Unions and Industry Associations.

1.2.3. *Deliverables*

- A short research report (no longer than 25 pages) with Executive Summary (2 pages)
- A verbal presentation (around 30 minutes) to highlight key findings and recommendations supported by a PowerPoint slide deck.
- Succinct recommendations for the industry, with roles and responsibilities allocated at local, national and international levels.

2. Approach and Methodology

As part of its design, the study has been divided into two components:

- i. Desk research - to understand the scope and objectives of different (past and current) labour rights based-initiatives and to gather information on the process and outcome of these initiatives while focusing on the research questions.
- ii. Mapping exercise - to list all initiatives previously conducted in Tamil Nadu and evaluate these projects and their results

The methodology adopted for the 1st component was based primarily on secondary research, while that of the 2nd component was based on primary research composed of interviews (KIIs and FDGs) with different stakeholders such as CSOs, INGOs, Donors, brands operating in the region (both previously and currently) and retailers, mill/ factory management, relevant government departments, trade unions, representatives from employer's association as well as beneficiaries with a particular emphasis on the women workers. The detailed process and methodology adopted has been elaborated below.

2.1. Study Component 1- Desktop Research (Secondary Research):

As a first step in the desk research, the research team rigorously reviewed online sources, reports by NGOs/donor organisations/government/brands, media clips and gathered information from professional networking groups, discussion/consultations with relevant organisations like ETI, Freedom Fund, etc. to list out different labour-rights based initiatives (both past and current) undertaken for textile mill/factory workers in Tamilnadu.

With a view to map the initiatives, specific information (such as details about the implementing organisation/s, donor agency, duration of project, funds utilised, geographical coverage and beneficiary coverage (scale of the initiative), methodology/approach adopted were collected by the research team and was presented through a spread sheet titled as 'Master List' (ref to Annexure 1). The source of information was also presented in the spread sheet for further reference.

The Master List documented 18 initiatives including the TNMS Nalam Programme and a few stand-alone research projects. Subsequently, for a better result, a 'sample' representative of 10 initiatives from the master list, were selected using the following criteria for in-depth study using a secondary research methodology:

- *Scale of the initiative*- coverage of beneficiaries and stakeholders' engagement
- Cutting-edge methodology and approach *adopted* by the initiatives in realising the results
- *Selecting a mix of initiatives*: For example, including a good mix of initiatives led by brands, NGOs, Government etc.
- *Age of the initiative*- including a good mix of initiatives including those that have been completed and some which are ongoing or have recently been concluded.
- *Location of the Initiative* - Including a mix of geographies from key clusters such as Tirupur, Erode, Dindigul, and Coimbatore.

The 10 labour-rights based initiatives thus identified for in-depth Secondary Research have been presented in the table below:

Table 1: List of 10 identified initiatives for In-Depth Study

SI No.	Name	Location	Implementing Organisation/s	Donor	Time period
1	"Sumangali – Eradication of Extremely Exploitative Working Conditions in Southern India's Textile Industry" (SEW)	Tamilnadu (12 blocks of eight districts of the state)	Terre des hommes Germany – India Program (tdh) and Community Awareness Research Education Trust (CARE-T). CARE-T partnered with Tiruppur People Forum (TPF), a network of 43 grassroots NGOs from 23 districts of Tamil Nadu.	German Ministry of Economic Cooperation and Development (BMZ) and Laudes Foundation (ex C&A foundation)	1st April 2016 to 31st December 2019.
2	'Building Decent Workplaces for Women Garment Workers Project' - Women garment workers in Tamilnadu	Tamilnadu	Homeworkers Worldwide (HWW) with Women Working Worldwide (WWW) Local partners - Social Awareness and Voluntary Education (SAVE), Tirupur and Rural Education and Development Foundation (READ), Pudukkottai.	DFID (RAGS Scheme)	2011-2013
3	Southern India Hot Spot project	Tamilnadu	Freedom Fund with 14 NGO partners in five districts of Tamil Nadu	Funding from Laudes Foundation, UBS Optimus Foundation and Lush Cosmetics.	Started - September 2015 (I guess it is still on)
4	'Factory support programme: continuous improvement of labour conditions in Tamil Nadu, India',	Tamilnadu	The project has seven signatories of the Dutch Agreement on Sustainable Garments and Textile working with their suppliers, Arisa, Mondiaal FNV, Euretco, Fabienne Chapot, HEMA, O'Neill, Prénatal, The Sting, WE Fashion and SAVE.	The Dutch Fund for Responsible Business (FVO) to finance the initiative	2020 to 2023
5	Partnership Initiative Tamil Nadu	Tamil Nadu Districts: Tirupur, Coimbatore, Erode and Dindigul	German Federal Ministry for Economic Cooperation and Development (BMZ), FEMNET, Hugo Boss, KiK, Otto Group, Tchibo	Multi-Stakeholder Initiative Tamil Nadu (MSI-TN) / SAVE	01.07.2018 to 30.06.2020
6	Tamil Nadu MultiStakeholder (TNMS) Nalam programme	TamilNadu	Ethical Trading Initiative (ETI)	Funding from companies and the Freedom Fund	Started in 2014 as a 5 year programme.
7	Pilot program for inspecting mill hostels Erode District	Tamilnadu Erode District	The State Women's Commission (SWC), Tamilnadu along with Erode District Authorities	Tamilnadu Alliance (TNA)	01-12-2020 and on going
8	Gethu is a workers' think tank	Tamilnadu	Partners in Change (PiC)		01-03-2019 and on going
9	Workplace dialogue	K'taka & Tamilnadu, Delhi NCR, Bangladesh	Options and Solutions in Karnataka and North India. In TN SAVE is the implementing partner	H&M	2017 ongoing.
10	Personal Advancement & Career Enhancement (P.A.C.E.) program	17 countries	Various	GAP	Launched in 2007 and Ongoing

Further with reference to Table No. 1, the 10 initiatives have been strategically identified to represent different stakeholders led initiatives. They are distributed as per the following (Table no. 2):

Table 2: Leading stakeholder category -wise distribution of 10 identified initiatives for in-depth study

Sl. No	Leading Stakeholder/s	Number of Initiatives
1	INGO/CSOs	6
2	Brands	2
3	Government	1
4	Workers Think Tank	1
	Total	10

Mapping Exercise of the identified Initiatives: In order to undertake an in-depth Secondary Research for mapping and analysis, the 10 identified labour rights-based initiatives were further studied by the researchers. A thorough review of available documents/reports of the identified initiatives was done. Using a ‘tool’ developed for the purpose (Refer to **Annexure 2**), detailed information gathered on the scope and objectives of the initiatives, on the process adopted, key issues being tackled and

outcome. The Mapping Notes of the 10 identified initiatives are available here at **Annexure 3**.

Subsequently, the information collected were analysed in line with the research questions stated in the ToR and have been presented in Section 3.1 of this report.

2.2. Component 2 - Mapping and Analysis Exercise (primary Research):

The methodology adopted for the 2nd component focused largely on Primary Research and was composed of interviews (KIIs and FDGs) with different stakeholders such as CSOs, INGOs, Donors, brands operating in the region (both previously and currently) and retailers, mill/ factory management, relevant Government Departments, Trade Unions, representatives from employer’s association as well as beneficiaries with particular emphasis on the women workers. While FGD as a method was used to collect information from different workers groups (local and migrant workers), KII was generally used for the interviewing representatives from the other stakeholders’ groups.

The selection of the participants for the interview was purposive (rather than representative), as this was considered most appropriate for qualitative methods. They were identified using the list of initiatives studied (in-depth study) as part of the Secondary Research in consideration of their close association with the initiatives. Few of them were also selected outside of these initiatives. However, the basic criteria used for selection of these stakeholders are as follows:

- Extensive experience and expertise in the sector working on the issue of workers’ rights
- Strategic in terms of their presence in the region and contribution to the sector
- Well known for their work on workers’ rights
- Part of credible initiatives
- Part of large-scale initiatives

Accordingly, a total of 47 stakeholders in different categories were selected and approached for interview. It took a little longer than expected to reach out to the identified stakeholders. However, finally, a total of 37 interviews were conducted as presented in Table No. 3.

Table 3: Category-wise distribution of stakeholders identified for interview

Sl No.	Category of Stakeholder	Number approached for Interview	Number interviewed
1	Donor	4	4
2	INGO	6	5
3	Brands	4	2
4	NGO/CSO	7	8
5	Employers Association	3	1
6	Factory Management	6	4
7	Government Representative	6	2
8	Trade Union	3	3
9	Worker/community Groups	8	8
	Total	47	37

Separate tools were developed for each specific stakeholder to conduct the KIIS and FGDs. The tools developed for the purpose can be found in **Annexure 4** of this report.

While some of the KIIs were conducted virtually using web-based mediums and phone (considering the COVID 19 situation), our research team also visited the targeted geographies of Tamil Nadu (Dindigul, Erode, Tirupur and Coimbatore) and conducted physical meetings (following COVID 19 protocols) with a number of stakeholders including Government Representative, Factory management, Trade Unions, CSOs and worker groups for better results. Detailed list of stakeholders interviewed have been provided in **Annexure 5**.

Information collected through these KIIS and FGDs have been collated into separate Interview Notes, which were then analysed to form the basis for this section of the report.

3. Study Findings and Analysis

3.1. Study Component 1- Desktop Research (Secondary Research):

This section analyses the information collected on 10 initiatives through desk research. The findings have been organised around different segments in line with the research questions stated in the ToR and are presented below.

It is important to note that while information related to different CSO/INGO led initiatives were available in the form of reports, project documents, evaluation reports etc., availability of information related to the Brand-led initiatives are limited in the open space. The study team experienced this limitation in analysing the information.

3.1.1. Reasons for establishing the initiatives:

It was found that most initiatives were established in response to the concerning reports of labour rights violations in the textile sector (spinning mills and garment factories) of Tamil Nadu, particularly that of young women workers.

Different issues such as restriction of the workers' freedom of movement, forced overtime, low pay and poor working conditions, denying workers their rights to freedom of association and collective bargaining, along with the occurrence of child labour, that prevailed in the garment sector of Tamil Nadu were highlighted in national and international arenas. The social and economic disadvantages experienced by women workers and the power imbalance in their relationships with their employers entrenched in recruitment and employment practices based on discrimination of gender and caste, was concerning and were the motivating factor in most cases.

Addressing the issues faced by young women workers, many of whom are employed under bonded and forced labour conditions, commonly referred to as the 'Sumangali' scheme and those living in hostels (in many cases controlled by factories), has been the primary objective of many of these initiatives. Improvement in recruitment and employment systems, better work-place, access to rights and entitlements, safe living conditions, encouraging workplace dialogue and industrial relations programs are some of the areas the initiatives focused on.

Although all initiatives were trying to address the common objective of ending workers' rights violations in the industry, each stakeholder had their own agenda and motivation to work in the sector.

3.1.2. What were the initiatives trying to achieve?

With the overall objective to end human rights violations in the textile and readymade garment chain and improve employment and work conditions for the workers, different initiatives worked to address different issues that may have been the contributing factors for the situation. While some of them were trying to a) work with the workers and the community to empower them, others tried to b) build capacities of the industry (factory management) and c) influence legislative policies and acts to make them pro-

worker. There are also several initiatives that attempted to achieve all three, by adopting a multi-pronged approach.

A dialogue process to ensure that all stakeholders would be able to participate, including mills and factory management/owners, workers, trade unions, government, brands, and NGOs was one of the major goals of multi-stakeholder initiatives such as the Dutch and German governments initiative and that of ETI (TNMS – Nalam) Project.

For example – the ETI- Nalam project was targeted at the empowerment of women workers through a multipronged approach of workers health and well-being, strengthening of industrial relations and support to government policy formulation. It believed that a better understanding of health and safety measures in the mills would be advantageous not only to the women workers, but also enhance productivity, thus making a business case for the mills to implement the projects. The aim was also to create appropriate grievance redressal systems that will act as a mechanism for government and brands to put pressure on them.

Groups like Gethu (the workers' think tank) has been working to create knowledge to influence policy making spaces in a systematic way to address multiple issues faced by the textiles supply chain.

Brand led initiatives, however, mostly focused on workers well-being programme within factory set up (suppliers). For example – initiatives like the PACE programme by GAP aims to give women the foundational life skills, technical training and support they need to advance in the workplace and in their personal lives. But there were limited efforts in these initiatives to ensure rights of workers in terms of freedom of association, freedom of movement, proper wage, social security benefits, grievance redressal mechanisms etc.

Monitoring functioning of hostels and homes for women and children as per the standards prescribed in the Act was the key objective of the government led initiative.

3.1.3. What issues were they tackling?

In their efforts to address the rights violations in the Textile sectors of Tamilnadu, the initiatives were trying to tackle several issues. The key ones are presented below:

Eradication of the Sumangali Scheme: Most of the initiatives led by NGOs and CSOs concentrated on the source of the problem as outlined in the report by Fairwear Foundation⁶ and others. Under the larger goal of eradication of the Sumangali scheme, NGOs and CSOs also aimed to tackle underlying issues of caste-based discrimination, poverty, dowry system, lack of understanding of labour rights and working conditions.

Even after the legal abolition of the Sumangali scheme in 2016, many women who had survived the distressing conditions in the mills, were left without any support. Thus, projects targeted Sumangali survivors and built capacity in workers to ensure that they understand their rights and entitlements and are able to earn a sufficient income.

⁶ <https://api.fairwear.org/wp-content/uploads/2016/06/fwf-india-sumangalischeme.pdf>

Lack of awareness among workers and community about rights – Many initiatives worked with worker communities, particularly young women workers, to raise their awareness on rights and entitlements, exploitative recruitment systems, workplace safety, safe migration, low employment standards, personal health awareness, safe living conditions in hostels etc.

A trust deficit among mill/factory management with NGOs, CSOs, and trade unions was also one among the many issues the initiatives tried to tackle. The ETI programme seems to have made some significant progress in this direction, through adopting a transparent approach.

Lack of a grievance redressal mechanism and freedom of association led to several other issues faced by workers. Many initiatives worked on this both at the community and factory/mill level. However, not much success has been achieved in this direction and one of the major factors contributing to ongoing rights violation in the garment sector in Tamil Nadu is the repression of freedom of association.

Lack of awareness of Factory management regarding rightful employment conditions: Many initiatives including the Dutch initiatives, TNMS, worked closely with factory and Mills and undertook several programmes to build understanding on employment conditions, Social Security benefits for workers (PF/ESI etc.), Health and safety of workers in the workplace, migration issues, Freedom of Association etc.

While the major focus of PACE is on improving women's lives, it also aims to create shared value whereby families and communities' benefit from the women's increased knowledge and skills, and factories benefit from increased efficiency, productivity and performance. The factories also benefit from greater retention and higher levels of skills in their workforce.

Absence of policy influencing actions: Some of the initiatives also aimed at creating platforms for different actors, gather knowledge and supported actions to influence policy of Government in establishing workers' rights in the textile sector. focus policy reforms/policy influencing. The Tamil Nadu Alliance, Gethu workers forum are some examples in this direction.

3.1.4. What was the scope and methodology of the initiative?

While the larger objective was to end rights violation, stakeholders adopted a range of strategies and approaches to achieve this. Most of the CSO/INGO led initiatives stressed upon a rights-based approach, whereas the brands and industry focused largely on the well-being mechanisms for workers.

Within this, the approach and methodology adopted by the initiatives were primarily capacity building of workers and factory management, rescue and rehabilitation of bonded workers, policy dialogue/policy advocacy, and also a mix of different approaches as stated above.

Few initiatives also adopted the **Multistakeholder approach** to address the situation. One such example is the TNMSI, which followed a Tripartite approach. Given that Workers' rights issues are often deep-rooted and widespread and are best tackled through **collaborative action**, the Ethical Trading Initiative (ETI) has adopted the multistakeholder approach and brought together a wide range of stakeholders to address issues of workers exploitation and improve standards in the mills and factories through harnessing the expertise, skills and resources of its alliance members. The stakeholders include brands, Universities, Trade Unions, Civil Society Organisations (CSOs), donors, Employer organisations,

recruitment agencies, Industry associations, Government, Factory owners and Managers, who came together to one platform as a **Multistakeholder Initiative** to identify the issues related to worker exploitation and recruitment standards; and develop innovative, long-lasting solutions.

However, bringing all stakeholders to one platform and working in a transparent was challenging, particularly because of the existing trust deficit between different stakeholders. Reports have also suggested that local civil society organisations should have been consulted in programme design, rather than only being given the opportunity to influence the implementation of the programme after the overall nature of the intervention was already determined.

The methodology adopted by the Gethu Group, of uniting workers from across the supply chain from cotton farming to stitching and packaging of garments, is establishing a peer educators' group and works as a parallel support group alongside trade unions. This is an experiment in forming a new model of support for workers in the future.

3.1.5. What were the outcomes?

Overall, our research indicates that as a result of different past and ongoing initiatives, reasonable progress has been made in addressing the human and labour rights abuses linked to the Sumangali schemes in some sections of the industry.

Some of the positive outcomes of the initiatives can be listed as follows:

- i. Workers are reporting improved confidence, better understanding of their rights and improvements in their working conditions. There are also reports of better relationships with supervisors. In some cases, workers are also reporting receiving pay increments.
- ii. Though in limited form, there are some visible cases of workers raising grievances around working conditions, to which factory management is actively responding. These include allegations around workplace harassment, harsh and discriminatory treatment, and the use of inappropriate sexual language by supervisors.
- iii. Registration of hostels for women and girls is one of the results that can be credited to efforts made by different initiatives. As a result of collaborative effort between Tamil Nadu Alliance (TNA) and the State Women's Commission (SWC), groundwork for strengthening the inspection process of hostels was done in Erode district, so that workers' issues can be identified and addressed. In addition, District Collectors across Tamil Nadu were advised to form a Hostel Monitoring Committee including NGOs and offered training and assistance in doing so. A training module has been developed by Tamil Nadu Alliance in coordination with State Commission for Women and block level inspection team members in Erode have been oriented.
- iv. Women who participated in the PACE project report increased knowledge, skills and productivity, as well as higher self-esteem and confidence. They describe becoming better at communicating, managing their finances, taking care of their health and planning for the future. The PACE programme has also helped enhance women's relationships at work, at home and in their communities.

- v. As a result of the Tamilnadu Multi stakeholder Initiative (TNMSI), a Code of Conduct has been released by South India Mills Association (SIMA). This is an achievement of the TNMSI. However, the majority of rights violations are found in the mills which are not part of the SIMA association.
- vi. The Tamilnadu Declaration by the Tamilnadu Spinning Mills Associations (TASMA) is another landmark development, that was possible as a result of different initiatives.

The research also found that the intervention and improvement has been limited to Tier 1 factories and a major section of workers are still out of their coverage. Hence, forced labour practices and rights violations are prevalent in many textile mills and garment factories of Tamilnadu in different forms. There were also limited efforts in these initiatives to ensure rights of workers in terms of freedom of association, freedom of movement, proper wages, and grievance redressal mechanisms etc

Our research also came across reports⁷ that critically review the Top-Down approach taken by ETI in the TNMSI. According to the report, the programme by ETI as developed in response to ongoing rights violations in the sector in Tamil Nadu took several years to design and its key elements were primarily negotiated and agreed among ETI staff and member organisations in London, rather than agreed through close negotiation with civil society groups in Tamil Nadu.

3.2. Component 2 - Mapping and Analysis Exercise (primary Research):

3.2.1. Approach and methodology adopted by these stakeholders/initiatives

Various approaches and methodologies adopted by different initiatives have led to a range of positive impacts on the industry at large. This section takes a closer look at these different approaches. There has been a steady progression from a 'worker-focussed approach to a multi-stakeholder approach across many interventions.

Some initiatives have focused on '**curative measures**' and adopted the methodology of **Rescue and Rehabilitation** of the Bonded workers (Sumangali Survivors) from the industry. In such an approach, the CSOs worked in collaboration with the State Labour Department and provided skill development trainings and support to the rescued workers to enable them to access alternative livelihoods. However, in the absence of a holistic rehabilitation plan, many of the rescued Sumangali Survivors subsequently returned to the industry.

This approach was confrontational and gave rise to a stressed relationship between CSOs and the Industry, which viewed the later as offenders. Reporting of issues in international forums impacted business as concerned brands pulled out of mills and factories. This gave rise to a 'trust deficit' between CSOs and the industry subsequently making access to factories and mills for the CSOs extremely difficult.

The worker-focused approach also emphasized '**prevention methods**', wherein awareness programs were conducted in the community to prevent migration and recruitment of girls and young women under the Sumangali Scheme.

⁷ <http://www.indianet.nl/pdf/ForcedLabourTextileGarment.pdf>

While these efforts brought out several positive changes in the landscape, such as the official ban of the Sumangali scheme, and enabled many survivors to lead their life with dignity; there were also many learnings from this experience. The shortcomings of creating a 'trust deficit' between industry and CSOs became evident, limited access to alternative livelihood options for the community was identified as an obstacle as many Sumangali survivors returned to the industry. The complexity of the sector thus laid out the need to work collaboratively with different actors involved to bring about sustainable change in the situation of workers.

The learnings led to the realisation that in order to bring sustainable changes in the situation of workers, it is important to invest in inter-linked strategies and focus on improving actions at different levels. This transpired significant innovations in the approach and methodology and led to the formation of the **Multi-stakeholder approach**. The Multi-stakeholder approach brings different stakeholders (such as CSOs, INGOs, Industry, Brands, Trade Unions) to one platform and worked to identify the issues related to worker exploitation and recruitment standards; develop innovative, long-lasting solutions in a collaborative manner through improving actions at multiple levels.

The Dutch Agreement on Sustainable Garments and Textile in India, the German initiative Partnership for Sustainable Textiles (MSI- TN), Tamilnadu Multi-stakeholders Initiative by ETI and Freedom Fund are some of the key multistakeholder initiatives implemented in Tamilnadu.

In order to work with vulnerable communities, workers and mill owners, and bring about changes; liaising with key actors such as government, multi-stakeholder forums, brands, donors and media became a core part of the strategy in these MSIs. Within these multi-stakeholder initiatives, different approaches have been adopted. While capacity building and policy influencing methods remains the overarching methods for most of these initiatives; empowering women workers and encouraging safe and informed migration also informs the approach and methodology of most of these MSIs.

While the challenges in bringing different stakeholders to one platform to work together in a transparent manner within a complex landscape are evident, certain MSIs have been able to make significant progress. For example, the Tamilnadu Multistakeholder Initiative by ETI focussed on a Tripartite arrangement with a 3-pronged approach. The pillars of this approach were a) Work inside the Workplace (capacity building), b) Work in the community, and c) Policy advocacy on the industrial empowerment standing in Tamilnadu. The approach also stressed on having a tripartite advisory group in London as well as a Local consultative group (LCG) with NGOs, Trade Unions and Brands, with the idea that the LCG will help and support the implementation of the entire programme.

As per its first objective, TN-MSI adopted a **participatory approach of seeking solutions to the issues with management at the workplace level**, wherein issues were not made public. Instead they engaged with mills to resolve them. This approach helped TN-MSI to bridge the trust deficit between CSOs and mill/factory owners to a great extent. The approach of taking the mill management into confidence by not involving brands and affecting their prospects, helped to bring about sustainable change in the workplace.

The other critical approach that helped TN-MSI in improving the situation of workers was, **having recruitment agents on board**. Their role in addressing the rights violations was thought to be crucial as they play the role of placing workers in factories. With the idea to build capacity within the whole community and the link between the community and factory, the recruitment agents were trained with support from the Tamil Nadu Spinning Mills associations (TASMA).

Similarly, in the Dutch Initiative (MSI-TN), the methodology adopted was based on two pillars – Training and Policy Dialogue (to ensure social security benefits are made accessible to workers). The idea was to bring all stakeholders together and the methodology adopted was for dialogue amongst various stakeholders, to ensure that workers' rights were addressed, and significant changes made.

All these efforts have brought about significant positive results inside the workplace. The TN – MSI programme had Mills who were nominated by other mills based on their experience (of working with TN-MSI), and not only by brands; signing an MoU with South India Mills association (SIMA); releasing of the Code of Conduct by SIMA.

The enabling approach adopted by these multistakeholder programmes also helped many workers access social security benefits like PF/ESI, built their understanding on unfair recruitment practices, led to the formation of ICC in the factories and mills (though limited to Tier 1 factories), led to the inclusion of NGOs in Hostel Inspection Committees amongst other outcomes. The establishment of the Tamil Nadu Alliance and the of the Tamil Nadu Declaration as a call to action for brands is also another milestone for these initiatives. They are discussed in the following sections in greater detail.

However, the Multistakeholder approach of working has its challenges too. Bringing different stakeholders to one platform and bringing consensus, is a challenging task, which makes the process of achieving concrete results much slower. As shared by a majority of our respondents, the stakeholders in Tamilnadu are highly fractioned. The trust deficit between NGOs, Trade Unions and Industry Associations continues to be a big challenge for MSIs to work together and undertake collaborative action. As put by a Brand Representative – *“one can create as many platforms as possible, provide adequate resources; but unless the industry decides to join, things will not change”*. Even within CSOs, there seems to be lack of cooperation. There are multiple networks of CSOs, wherein different players are unable to work together. This remains a major challenge for the multi-stakeholder approach to succeed.

3.2.2. Achievements by the initiatives

A total disregard for labour and human rights prompted the need for actions by many players in the larger landscape in Tamil Nadu. Through different initiatives, these organisations have made significant contributions to ensure safe and better working conditions for workers, by adopting some critical approaches like capacity building and policy dialogue. ***However, while contributions related to policy change/influencing have benefitted the workers at large; the capacity building initiatives have focused largely on Tier 1 factories.*** Some of the key achievements are discussed below:

A. Abolishment of the Sumangali scheme

Several initiatives have worked consistently through interventions at community, individual young woman workers and their family, management, and mill levels, to address violation of rights in recruitment under the Sumangali Scheme. One such initiative is the Freedom Fund supported Southern India Hot Spot program. While working with 14 NGO partners in 5 districts of Tamil Nadu, the initiative supported community groups in vulnerable families in 400 villages. The community groups were supported to identify and address the root causes of vulnerability, including gender and caste discrimination, access to better sources of information and workplace conditions, and need for alternative incomes.

Pressure created by different initiatives and networks, and Trade Unions, led the government to take cognizance of the situation at the mills resulting in legal/official abolition of the Sumangali scheme. NGOs working in the area of labour rights rescued women workers (Sumangali Survivors) who were trapped in the hostels and made all arrangements to send them back to their homes. They were young (15-18 years) women who had survived traumatic living conditions and abusive working conditions over a period of time.



Figure 1: FGD with Migrant workers

Several initiatives which targeted these Sumangali survivors brought about some significant results:

At the community level: The interventions targeted the source communities from where the workers were being brought into the mills as forced/bonded labour. A majority of these women workers were from the Dalit community and lived in utter poverty. The community initiative included the formation

of small groups of survivors and training them in other skills.

Some of the survivors have been assisted to start small businesses employing others. The groups also counselled parents and young workers who may be targeted by recruiters through false promises, this has led both the parents and young workers learn about their rights. The workers now insist on knowing about their working conditions beforehand, as seek a firm appointment letter with terms and conditions.

Parents are also aware of the pitfalls of sending their young daughters to the mills and seek advice prior to agreeing. As a result of efforts by some initiative, the Sumangali survivors have also formed an informal network to ensure that their learnings are disseminated in the various villages that they work in.

This has prevented many other young girls from the pitfalls of this form of forced labour.

At the Individual level: As most of the mills were not amenable to the NGOs working inside the workplace, many initiatives worked at the source villages in the community by providing skill development, leadership, communication skills to the young women. The result is seen in some of these women workers now being promoted to the level of supervisors. With the workers becoming more aware of their rights, entitlements and responsibilities; the abuse of rights has decreased.

At the level of Mill management: Mill management, especially the persons who are in charge of recruitment and worker welfare, are now aware of the necessity of following all legal requirements. Hostels are open to inspections by interested stakeholders. This has ensured that hostels are clean and have the required space and hygiene requirements.

B. Reduction of child labour

Apart from the Sumangali scheme, which was abolished in 2016, there were other violations of human rights within the mills and garment factories. One significant contravention was child labour. Thus, children were seen working in the mills without any restriction, and this was despite promulgation of The Child Labour (Prohibition and Regulation) Act, 1986 And Rules.

READ (Rights Education and Development Center) is one of the NGOs working towards eradication of bonded labour and with the Sumangali Survivors and is funded by Freedom Fund. 2500 women have formed a federation which promises safety in the textile companies where they work, 5000 + families have been encouraged to participate in panchayats and obtain rights and entitlements such as pensions, identification cards etc. 91 children and at risk young textile workers were provided scholarships for education, ICC was established in 35 textile mills.

As per the NGOs, INGOs and brands, and District Child Welfare Officer, it is now seen that child labour has been eradicated in Tier 1 factories, especially in export-oriented factories and mills. This was due to the joint effort of INGOS/CSOs/Trade Unions and the Government, the Sarva Shiksha Abhiyan, and followed by improved enforcement. This was corroborated by all the grassroots NGOs, CSOs, worker groups, and mill management that we spoke to. As per the Trade Union spokesperson, the workers would rather send their children to school as there were schools in the vicinity. Children of migrant workers from Bihar, Jharkhand, West Bengal, and Orissa, were provided with education in their local language/Hindi. Mills have started schools in the areas where the migrant workers are settled which has led to less absenteeism among the workers. They do not need to return to their villages very often as all the facilities are available in their workplace. This was also

confirmed by a group of migrant workers during our research.

C. Introduction of Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014:

The sustained interventions and advocacy of the various stakeholders has ensured that the Government of Tamil Nadu has formulated a law titled Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014. This is now being implemented with the district authorities as well as local NGOs being part of the Hostel Monitoring Committees.

Though this has not been implemented in all hostels as the enforcement is still an issue, the Act is certainly a tool to fight for rights of worker.

D. Reduced involvement of Recruitment agents

Parent's awareness of conditions inside a factory has improved. Previously agents were the only source of information available to parents. This has changed. Although agent's intervention has not completely been eradicated, it has reduced to some extent. Now workers inside the factory recommend the work to others. This is also the case with migrant workers. Involvement of many skill development centres run by institutions under the DDU-KGY Scheme has been increasingly getting noticed in recruitment of migrant workers too.

E. Improved working conditions, health and safety

As an entry level project in gaining the trust of the mill management, the NGOs and CSOs working towards better working conditions in the mills and factories, have started with health and safety trainings of the worker. Given that it was a non-threatening space, the management was more amenable to the idea. Thus, capacity building of workers in health, hygiene, and safety was carried out. The Nalam project of ETI focussed on the well-being of the women workers by training them on hygiene, including menstrual hygiene. This has led to clean workspaces and toilets, less absenteeism, greater productivity. This was confirmed during an interview with the VP HR of Rajapalayam Mills Limited, who also stated, “There is a spill over effect of the training into their personal lives also. Workers are practicing what has been learnt here in their homes and communities. This is a most welcome change”.



Figure 2: Meeting with workers in a factory set up

F. Improved awareness on Grievance Redressal mechanisms:

With interventions by CSOs like Fairwear Foundation and others, there has been increased awareness amongst workers and factory management about POSH Act and the redressal mechanisms. The erstwhile Sexual Harassment Prevention committee was on paper only and did not function effectively. Although sexual harassment and verbal abuse are common in Mills and factories, it was rarely addressed. NGOs and Brands (with their awareness on international norms and requirements) have worked with mill management to set up fully functional Internal Complaints Committee

(ICC). This included training of workers, training members of the committee, and having an external unbiased member to participate in the ICC. Through this committee and the training received, workers stated that the incidence of sexual abuse has reduced. Management is also aware of the zero-tolerance policy of brands towards such practices and have ensured that the ICC is effective.

One of the groups that we interviewed stated that they had requested that the number of CCTV cameras be increased in the outer area of the factory. This has helped to reduce random incidents of sexual misconduct. The women workers' group of Suryagiri Spinning Mills said, “We wanted to prevent any doubts about our complaints, hence we asked the management to increase the number of CCTV cameras in the periphery of the facility. This is monitored by the security, the managers, and even the owners of the factory. We feel safe now”

Several interventions in this direction have definitely raised awareness of workers as well as factory management on the POSH Act and the grievance redressal mechanisms, though limited to some Tier 1 factories only; but actual implementation of the same still remains a grey area.

G. Increased awareness of workers about right Wages and Social Security Benefits

Due to the training and awareness programs provided to workers on their rights, workers are now demanding written agreements which include wages and benefits. Wages are deposited directly in bank accounts, thereby leading to financial independence for the workers. Benefits such as ESI and PF are provided by the employers to all permanent workers at the factory. Complete wages are being paid regularly with appropriate deductions. Workers now know about their wages and benefits to raise any grievance and follow through. This was confirmed by one of the CSO representative during out interview.

Some of the positive instances gathered in this direction are:

- During the pandemic, workers were provided with grocery and part salary by the mills. Those migrant workers who wanted to return to their homes were provided with transport and passes.
- Discrimination in wages has decreased due to the sustained pressure from the grassroots organizations.
- In few cases, the Trade Unions are also included in the process of wage negotiation. Stronger trade unions which are not politically affiliated, are also working in the wage negotiation.
- Discrimination in wages based on age and experience was reduced due to the initiatives of revision of minimum wages and periodical apprentice wages (for example Apprentice wage has been increased from Rs 413 to 477.00 in April 2021- March 2022).

H. Tamilnadu Declaration

One of the key achievements of the multistakeholder initiatives has been their efforts to bring major stakeholders onto a single platform. This has encouraged dialogue on most of the issues faced by the workers, especially women workers, in the supply chain. Bringing multiple stakeholders on a single platform by motivating them to focus on women mill workers is a stride made in the last ten years.

The **Tamil Nadu Declaration** is a significant milestone in this direction. It is a call to action for international brands and retailers to tackle exploitative working conditions, including all forms of forced labour, within the textile supply chain in Tamil Nadu.

The Declaration provides a roadmap for business action (the Framework of Action) that is framed around **five goals** that are necessary steps to eradicate exploitation in the industry:

- Expand supply chain transparency to all textile manufacturing facilities
- Support the effective implementation of labour laws and protections in Tamil Nadu
- Adopt sustainable sourcing and purchasing models that promote decent working conditions throughout the supply chain
- Integrate worker-driven approaches to monitor compliance with labour standards
- Support the development of a collective grievance mechanism in Tamil Nadu

As a result of this, Associations and Suppliers have increased their infrastructure, monitoring mechanisms and social audits, as rights-based groups exerted pressure on brands and suppliers. Brands also have gradually enhanced their welfare programs in the factories and are also reviewing their purchasing practices. The issues of interstate migrants' registration post-COVID pandemic period and hostel registration inside mill seem to have gained momentum.

3.2.3. What the previous initiatives did not achieve

A lot of progress has been achieved for the workers in the Tamil Nadu garments sector by the multiple initiatives over the last decade and more time. But at the same time, there is still a long way to go to ensure decent working conditions for all garment workers (especially women workers) in the TN garment and spinning mills clusters. Our interviews with multiple stakeholders did show that there is continued practices of exploitative working conditions (including practices that can be classified as force labour and modern-day slavery) in the cluster. Similarly, there is still instances of child labour, although not as overt and prevalent as a decade back. Women workers still are vulnerable to verbal and physical abuse at workplaces; and there is still gender based, caste based (and in recent times language or migrant status based) discrimination.

With so much of focus and intense pressure on the garment business to improve working conditions especially for the women workers, over such a long period of time with multiple interventions involving so many stakeholders – continuation of such exploitative labour conditions still being prevalent in the region calls for an enquiry into what are the gaps and shortcomings of the previous programmes. The discussion with a range of stakeholders involved in the garments supply chain and multiple interventions gives us the following major areas of gaps in prior interventions:

A CSO representative shared

“mobilizing migrant workers is a much larger challenge, as they work under severely restrictive conditions. The language of rights does not work for them, as they are escaping the grinding poverty and lack of opportunities in their native places. They are also not directly employed by mills, but working under petty contractors – who themselves are in a vulnerable insecure situation. None of the major initiatives have so far tried to address the challenges of the petty contractors and win their trust. Thus improving the working conditions for workers under them is far more problematic”

Mindset of Businesses have not changed: Both garment units and spinning mills look at cost saving as a major driver of profitability and business expansion and look at responsible labour practices as a cost head. The main cause for investing in improved labour practices for them is to ensure compliance, but not something they should naturally do as a good and ethical business. Reliance on cheap labour, maximising productivity (even with excessive overtime), having a high proportion of casual / contractual labour with a network of sub-suppliers and sub-contractors are not seen as bad for business. Changing the mindset has not been a key focus of the initiative – most initiatives have looked at adherence to compliance as a driver of change.

Multiple stakeholders with differing agenda: The interventions in the past decade have all involved multiple stakeholders trying to bring them on a common platform of the programmatic agenda. At the same time, these stakeholders (be it brands, be it manufacturers, or Trade unions or CSOs) are often pushing their own agenda on to the programme platforms and not speaking as a TN industry level common voice. There is a constant tussle

between the specific stakeholder agenda and the programmatic agenda – which has kept a balance, but at the same time constrained forward movement with a definitive direction. The previous programmes have failed in fostering a unified common agenda at the overall sectoral level which is truly championed by all involved stakeholders.

Government institutions involved but commitment missing: A decade ago, as these initiatives started, there was intense pressure on the entire industry based on critical media coverage and consumer movement. This made the government to take notice of the issues (especially of the Sumangali scheme and common prevalence of child labour) and recognize the negative impact of these. Thus, the relevant government institutions were willing participant in the multi-stakeholder initiatives, which they felt were also addressing their agenda. But within a few years of the initiatives, government banned the Sumangali scheme and also declared eradication of the practice. Now having officially declared the practice as eradicated, the government seems to have achieved its objective and would like to project an image of a clean and fair industry in place. Government has a strong focus on ensuring ease of doing business and export promotion – and they feel the perception about the industry needs to be improved, irrespective of whether the core issues related to exploitative labour practices are addressed or not. The advocacy from the industry bodies with the government seems to have been more effective; and while different government institutions are still participants in various multi-stakeholder platforms; the intent and commitment to drive real change on ground seems to be missing. The previous programmes have not been able to advocate for continues commitment from the different government institutions who are part of the programme initiatives.

Initiatives have not been able to keep pace with the changing eco-systems: The last decade has seen significant and sweeping changes in the overall industry eco-system, in the form of higher proportion of inter-state migrant workers, Increased degree of casualisation of workers and involvement of large numbers of petty contractors. While these trends were emerging independently, ironically the various initiatives improving the awareness and voice of local workers communities have accelerated the change towards migrant workers and introduction of multiple layers of sub-contractors, so that the accountability for the principal employers can remain vague. Intervention plans of most previous programmes have not been able to keep pace with these changes and have not been able to adapt their activities to address these new challenges which are more difficult to address.

An impending crisis like the Covid induced lockdown could not have been anticipated, but the relative lack of coverage of different initiatives beyond the tier I factories or integrated mills meant the support system during the crisis to the vulnerable worker communities was unavailable. This meant the largescale loss of jobs, and lack of access to any support system during the crisis period could not be addressed adequately.

Low coverage and participation of domestic supply chains: It has emerged from discussions with multiple stakeholders that the main focus of all major initiatives have been with those actors involved in the global (export oriented) supply chain. Thus, the positive changes achieved by the interventions have been more pronounced in the tier I factories or in those mills that are part of a vertically integrated export oriented system. These impacts become far less pronounced as one looks at lower tier suppliers as well as those factories and mills that mainly cater to domestic supply chains. But the number of workers involved in these units is significant. Involvement of key domestic brands and their supply chain partners is a key element that has emerged as a gap area which leaves out a large proportion of workers.

3.2.4. Identifying specific challenges to success

Overall, our research indicates that some progress has been made in addressing the human and labour rights abuses linked to Sumangali schemes in some sections of the industry (particularly in Tier 1 Factories) but forced labour practices in other forms and rights violations still remain prevalent in many textile mills and garment factories. The various claim-making strategies considered have had minimal impact on global

business practices. At the level of individual factories and mills, the failure to address freedom of association violations remains a significant barrier to garment sector workers being able to seek redress.

Some of the key challenges to success as identified by the research are as follows:

- *The Informal Nature of the Sector-* The Covid 19 Pandemic and the induced economic shock has completely undone whatever marginal improvements the sector had realized after years of efforts by many; as there was mass job losses and informal labor retrenchment in supply chains. Interviews with worker groups during the study reiterated this. Workers reported loss of income during this period. At the time of the study, many workers still did not have work. They reported that their financial situation was severely impacted, and basic food and health care became a major cause for concern.

After many months when the factories reopened, employers were selective about who they would employ and under what terms. More experienced workers were let go off. Younger workers employed on a casual or contractual basis without bargaining power were preferred making these workers more vulnerable.

- *Demographic change in the constitution of workers – increased presence of inter-state Migrant Workers-* Interviews with local NGOs as well as migrant worker groups suggest that there has been a steady increase in the number of interstate migrant workers in the sector. These workers are particularly vulnerable due to poor access to grievance redressal mechanisms due to language barriers and poor networks in destination locations. Poor awareness about labour rights and working conditions makes them particularly vulnerable to abuse. Migrant workers are also preferred by employers resulting in a loss of jobs for local workers.

About 3 lakh (Dalits) Arundhatiyar community workers are engaged in textile and knitting industries in Tirupur, Coimbatore and Erode districts. These communities make up 17 percent of the total population in these three districts.

In the textile and knitting industries these community workers are not offered jobs as Supervisors, Managers, Contractors, sub-contractors etc since they have been considered untouchables in society for a very long time and the majority are not even involved in jobs like Tailor who get a good salary in the textile and knitting industries.

Instead, they are engaged in low-paying jobs like checking, hand folding, helper, cleaning, packing, loading, dyeing, bleaching, and sweeping. These textiles and knitting industries have discriminated against these people who are already affected and suffering from caste oppressed and discrimination in society.

Therefore, Manufacturers, Export companies and Branded industries should consider this as social slavery and bring justice to these communities and also develop the textile and knitting industry.

One of the NGO Directors expressed his views and thoughts on the Dalit Communities during our interview.

While the sector has started to make some progress (in addressing rights violations) in the last so many years with several strategic interventions, demographic change in the constitution of workers have made them less relevant vis-à-vis the distinctive issues and problems of migrant workers. The sector now needs to come out with specific strategies to address the issues related to the changing eco system.

- *Deep-rooted Caste-based Discrimination-* Breaking the glass ceiling for marginalized Dalit communities who have been toiling in lower labor positions for years together without any promotion, seems to be another evident challenge to success for the industry where the industry owners are from the dominant caste. It was found that mainstream societal hierarchy is being reflected inside the workspace irrespective of skill and expertise of workers, particularly marginalized women.

Companies recruit migrant workers because there is lower accountability for them. Migrant workers cannot say no to overtime and happy to work at lower salary. That becomes the bargaining benchmark when the employer the employing local TN workers. In places like Erode, clearly, they are employing more migrant workers than local workers.

NGO Representative

- *Sub-Contractors in the supply chain* - Not enough intervention has taken place to engage with sub-contractors within supply chains. Sub-contractors take a cut from the wage bill of the company and in a situation of grievance workers deal with the sub-contractor as the main employer does not take any responsibility / accountability. During our interviews with workers, particularly migrant workers, we found that the lack of freedom of association of workers was policed primarily by the agent. Often these petty contractors are themselves victims of late payment and low margins – so they perpetuate and passing these constraints on to the workers that work with them. There is no intervention to organize the petty contractors, make them aware and be effective in demanding timely and fair pay. The crucial role of sub-contractors, petty contractors, and agents in achieving worker rights needs to be recognized and addressed.

- *Limitations in using “rights” terminology* - Interviews with local NGOs suggest that in many instances the terminology of worker rights has been difficult to use. Especially in the case of the most marginalized workers, who enter the sector from a position of severe financial crisis, their fear to engage in demanding rights due to their extreme vulnerability has been a challenge. Mills and factories also resist the use of the rights-based approach. According to Srinivas, the Director of the PEACE Trust, an NGO working on labour rights in Erode, it has been much easier to engage with factories on issues such as health and hygiene that have been seen as less threatening to mill management.
- *Role of the government-* Inefficient enforcement of different Rules and Acts by the government has been another key challenge to success. The government is not pro-active in implementing laws that can protect workers from abuse. Interviews with trade unions leaders suggest that the textile lobby is very well networked with government authorities, and hence the government is unable to perform its duties as an independent entity. Revision of minimum wages for the sector has still not taken any concrete policy directions. Convergence among line departments is also abysmally poor.
- *Commitment of Brands* – It was learnt during the study that commitment from Brands needs a great push. Their focus is primarily the main supplier’s factory, at the Tier 1 level; while majority of workers are beyond the employment of the tier 1 supplier.

Even though social audits are conducted by independent corporate groups, translating the recommendations into reality and workers led monitoring of these recommendations is yet to be achieved.

- *Purchasing practices of Brands* – The purchasing practices by brands also pose as a major challenge in ensuring rights. Brands and buyers need to ensure that the finished products that

TN declaration and government enforcing laws (like human rights due diligence law in EU; need ore teeth on modern slavery act in UK; and govt of India needs to enforce its laws on Child labour, Labour codes etc). Pressure on brands for transparent supply chains and decent working conditions.

Need for all initiatives to converge on join action like the TN declaration to put pressure on brands and buyers. CSOs have shown that it is possible to come together on a common agenda thought TN alliance. Dr. P. Balamurugan, Program Advisor from Freedom Fund team has done a commendable job to bring them together. It is important for all major initiatives to back TN declaration and put pressure to improve situation.

- Inclusive Supply Chains policy advocacy Expert -

they are purchasing does not involve any child labor or forced labor in any part of the supply chain. Maintaining transparency in supply chains and adhering to fair and responsible purchasing practices that enable those involved in all tiers of the supply chain to be decent employers, offer employment contracts, and pay a living wage to their workers, is the need of the hour.

- *Trust Deficit among stakeholders* – While the multi-stakeholders initiatives have remained successful in bringing different stakeholders - NGOs, Trade Union and Industry associations, Brands etc - to one platform, there seems to be immense trust deficit between them. They are not comfortable working with each other. They

would attend functions, but bringing them together to undertake a collaborative programme is extremely challenging.

3.2.5. Prevailing Gaps (knowledge, Attitude and Practice)

Our study, in the earlier sections, has systematically documented the improvements that have been realized in the entire landscape of human rights violations in the textile sector of Tamilnadu, as a result of different initiatives in the last decade and the challenges faced in realizing the desired results. This section particularly focusses on the gaps that still exists in the landscape in the form of knowledge, attitude and practice keeping in mind the future interventions, as collated through information collected from different stakeholders.

Knowledge Gaps:

- In their efforts to improve the workplace, most of the initiatives so far have focused largely on Tier 1 Factories. The different capacity building programmes undertaken with the factory management have resulted in the improvement of workplace in terms of formation of ICC, provision of social security benefits to workers, etc. However, there are still thousands of mills (Tier 1, Tier 2 etc.) who are untouched by any initiative. Reaching out to them and building their understanding and knowledge on different methods, rules and acts concerning factories, workplace improvement and ensuring workers' rights and entitlement; and more importantly, the benefits of implementing them is the need of the hour.

- Limited capacity of Trade Unions also seems to be another gap in the sector. Some of our respondents felt that most of the TUs are not strong and hence are not effective in their role – unionization of workers, empowering them and influencing policies and acts of the government. Active participation by women members as well as leadership by women is an area that appears largely unfilled in most of the TUs in Tamilnadu. Hence, considering their strategic role in ensuring workers' rights, it is important to build capacity of the TUs in relevant areas and issues.
- Knowledge and capacity of many CSOs to work in the area of labour laws is a gap that poses as a roadblock to effectively work with factories and Mills. This goes with, limited knowledge and understanding of workers about their rights and entitlements, safe migration, fair recruitment process, fair wages, safe living and working conditions etc.

"The biggest gap today is that workers have hardly any access to remedy or to raise grievances"

~ INGO Representative ~

Attitudinal Gaps:

- "The biggest gap today is that workers have hardly any access to remedy or to raise grievances"- as being shared by respondents representing an INGO. If a worker is continuously facing exploitative practices, they do not know where to go. In case of violation that exist in garment factories, there is no hotline (similar to Childline) where it can be reported. Initiative like TNMS, with a number of brands as members, would have been able to make greater impact on reducing the ongoing rights violations, if member companies of ETI would have been brought together to use their collective buying power to persuade the mill and factory owners to work in this direction.
- "Workers need Industry, Industry needs workers and Government needs business." This is what was put by one of the respondents of the study representing the Industry association in describing the Tamilnadu Textile sectors and the issues therein. The attitude of factory management and Industry Association was found to be a major gap in the process to end rights violations. Many of our respondents feels that despite knowledge on different employment rules and implementation of the same, there is lack of clear commitment from the management to implement the changes.
- From the Brands side, lack of transparent supply chain is a big gap. If brands were to map their entire supply chains and make lists of all their suppliers publicly available, then this would increase the brands' accountability for labour conditions below the first tier of their supply chains.
- There are many Networks (of CSOs) in Tamilnadu and many of them are working for the same cause. However, there is always a competitive attitude which manifests in a stressed relationship between different networks. As a result, there is lot of duplication of efforts affecting wider

*Workers Need Industry,
Industry needs workers and
Government needs business.*

*-Industry Association
Representative-*

results. Such a situation also confuses the Brands, rather than helping them to work in a comprehensive manner.

Gaps in Practice:

- Effective enforcement of the Labour Laws by the state government in terms of wages, excessive working hours, freedom of association, Freedom of movement, Grievance Redressal Mechanisms etc. is a huge gap in addressing rights violation in the textile sector of Tamilnadu. For example – many initiatives like Fair Wear Foundation have focused strongly to build capacities of factory management to have the Internal Complaints Committees (ICC) as part of grievance redressal mechanism. But function of these ICCs is still a big gap, one of the reasons being lack of monitoring by government or brands.
- In the last few years, as a result of intervention by different stakeholders, the Tamilnadu government has introduced few policy guidelines in addressing the rights violation in the textile sector, such as the Tamil Nadu Hostels and Home for Women and Children (Regulation) Act, 2015. According to this law, all women and children's hostels must be registered with the respective district collectorate. In December 2018, mandated that all hostels must be registered, failing which they cannot continue operations. At the same time, it was also mandated that the management of the hostels has to be done by NGOs. However, there is a huge gap in the enforcement of the act and guidelines. As shared by some of our respondents, less than 50% hostels are registered as of now.

“One can create as many platforms as possible, provide adequate resources; but unless the industry decides to join, things will not change”.

-: Brand Representative: -
- While there are several multi-stakeholders' platforms, there is a gap in terms of inclusion of government as a stakeholder in these platforms. Inclusion and participation of government or organisations like ILO would make the platform more credible and will legitimize the decisions and actions.
- As a result of the interventions and efforts, several positive changes have been realised at the workplace level. However, there is no mechanisms available for sharing good practices and mutual learning and incentivising factories who have adopted good practices.
- There is a particular need for transnational businesses to improve the way they monitor and audit labour conditions among their suppliers beyond the first tier, in addition to the need to improve the ongoing social auditing of direct suppliers.

4. Changing landscape of Mill/factory worker situation in Tamilnadu and Emerging Intervention Ideas

i. Changing landscape with respect to worker composition:

Over the last decade, there is a perceptible change in the composition of workers in spinning mills and garments factories in TN which constrain the different initiatives for workers' rights to achieve their objectives effectively. While a decade back, the workers were predominantly from Tamil Nadu (mostly from nearby villages or within the same districts where these mills or factories were located), now a significant proportion of workers are migrant workers (either from other districts of TN or inter-state migrants from states like Odisha, Jharkhand, Assam and others). Initially when migrant workers started coming into TN garment clusters, they were more likely to be male and often skilled. But over a period of time there is a higher proportion of women migrant workers; and often less skilled who come in through recruitment contractors often working as casual / contractual (piece rate) workers. Many of these workers are also recruited through skilling institutions trained under Deen Dayal Upadhyaya Grameen Kaushal Yojana (DDU-GKY) Scheme (MoRD, Government of India) in the source states. Change in worker composition has also brought in several other changes in the employment conditions, such as hostel arrangements, long working hours etc. In many cases these arrangements have become nurturing grounds for rights violation.

ii. Informal workers in sub-contracting units:

There is one more change that we see in the worker composition. Earlier workers in a mill or factory unit were likely to be directly employed (either on payroll or on contractual basis) by the unit itself. But most stakeholders reported that there is now an increased trend of casualization. A significant part of the work is outsourced to sub-contracting units (which could be un-registered units) with informal workers. In most mills and factories, there could be a large number of workers who are not directly employed but are working through a layer of sub-contractors. Often these workers are working on oral agreements (and lack any paperwork related to their employment) - This makes it difficult to fix accountability in case of any rights violation.

iii. Impact of COVID 19 linked lockdown and economic crisis on the overall business:

Over the last 18 months or so, the most significant impact on the garments industry has been due to the Covid crisis related lockdown and economic slowdown. Twice within a period of one year the industry has had to lockdown driving thousands (if not millions) of workers unemployed. For migrant workers, the crisis has also come with lack of access to any social welfare scheme in a different state (without the right paperwork most migrant workers have not been able to receive cash support or free ration support, becoming completely dependent on charities). Many have had to make a journey back to their native villages at great peril (both in terms of health concerns and security risks). Though the industry has opened up again this year, it has still not started functioning at full scale. There are still large number of migrant workers who are weighing their options whether to come back to work or not, at the same time the employers are also preferring casual / contractual workers in the face of uncertainty. This increases the vulnerability of the workers and constrains their ability to access social protection / security measures. The businesses are cautious in their outlook as the economies in most parts of the world are opening up (the domestic markets in India have taken a big hit due to the economic contraction). This situation pushes

the margins down for everyone in the supply chain and the worst hit are the workers (especially casual / contractual / informal workers).

iv. Use of Information Technology for grievance redressal:

There have been increased use of information technology in enhancing transparency in supply chain and making grievance redressal more effective in the last few years. The telecom revolution of the past two decades in India has meant more and more garment workers are now having access to mobile phones, a significant number of them to smart phones and communication apps. Many interventions have used the platforms of Digital Apps to deliver awareness messages or used apps to create connections between workers and brands for grievance redressal. Two commonly mentioned apps in this context are “TIMBY”⁸ and “Ulula”⁹. While such apps have made registering of a grievance easier for the workers – redressal mechanism is still poor. There is a need for industry wide adoption of these apps or technology platforms – and multi-stakeholder initiatives to ensure proper follow up for redressal of the grievance registered using these platforms to make these effective.

v. Evolution on policy framework:

This period has also seen evolution of a number of progressive legislations and policies at National and Global level on enhancing human rights in supply chains. Prominent measures like the UK modern slavery act, discussions around Human Rights Due Diligence at EU level and similar legislations in number of US states like California are demanding brands / buyers operating in these countries to ensure workers’ rights in their global supply chain right to the manufacturing point. In India as well, there is a national action plan on B&HR which require corporate buyers to ensure rights of workers in the supply chain. Different initiatives can play a positive role with engaged brands and supply chain stakeholders to ensure effective compliances of these legislations and guidelines, thus creating a strong partnerships with government and positively impacting on workers’ rights.

vi. Thoughts of stakeholders on the Tamil Nadu Declaration:

In the last couple of years a convergence of objectives is emerging among multiple CSOs engaged in Tamil Nadu garment workers’ rights. ETI’s Naalam initiative has played a significant role in building the TN Multi-Stakeholder Alliance, which is currently operating a Tamil Nadu Alliance with most major CSOs being part of this. Freedom fund intervention has played a key role in continuing this partnership and bringing them together on a common page. This alliance of CSOs have come up with a policy unit commonly known as Tamil Nadu Declaration which pushes for greater brand/ buyer engagement, increased supply chain transparency and greater compliance on workers’ rights issues. There is on-going debate in the sector on what role supply chain actors can play in this. The TN declaration is emerging as a key course of joint action that can be adopted by multiple stakeholders.

⁸ Whether you are monitoring climate change, human rights, illegal activities, aid distribution or factory grievances, TIMBY helps turn localized data into remedy with a suite of interconnected digital tools. www.timby.org

⁹ Ulula app automates remote impact assessment and effective communication to protect vulnerable workers and community members from COVID 19’s health, safety and economic risks. For more information, visit www.ulula.com

5. Recommendations on areas of future interventions

The specific recommendations on areas of future interventions, which follow systematically from the analysis of the previous sections, as shared by our respondent stakeholders, are consolidated in this section. While some of the suggestions are quite strategic in nature, some relate to situations at the operational level and others refer to changes in government policies.

- i. *Strengthening Grievance Redressal Mechanism:* The biggest gap in the today is the absence of grievance redressal mechanisms for workers. In case of a rights violation, there is no body where they can register their complaint in a transparent manner. Hence, future programmes, must focus on access to remedy and grievance handling. Appropriate mechanisms should be put in place, at the local level, so that workers can easily access these avenues. A helpline and appropriate measures to ensure workers are made aware of these avenues of support are recommended. The innovative use of technology – apps like Dingy or Ulula – may also play a key role in this regard.
- ii. *Strengthening the Quality of audits by Brands:* The quality of audits by brands needs to be reviewed seriously. Mechanisms should be put in place to encourage open discussions with factory owners to bring out issues of violation and ways to address them. This would enable factory owners ultimately address these issues within their factories.
- iii. *Adopting a Credit Reward and Consequence Model:* It is important to use a model that rewards factories/Mills with good performance on worker rights, social security for workers, living conditions in hostel, freedom of associations, grievance redressal system etc. The Industry Association should ideally take up this responsibility to do performance ratings of Factories/Mills and Brands can choose from those ratings to select their suppliers. The Code of Conduct as developed by SIMA is a good development in this direction.
- iv. *Following a Unified approach by different stakeholders:* Almost all respondents shared their concern about the dissensus among stakeholders in Tamilnadu, which was considered to be one of the key reasons for the slow pace of improvements in workers' rights. They shared that a unified approach focusing on the common agenda of making the industry a better workplace would work best for all involved. In this direction, there is a need for all initiatives and stakeholders to converge on a join action like the TN Declaration to put pressure on brands and buyers to improve situation.
- v. *Revamping the role of Trade Unions:* Considering that Freedom of Association is a major rights violation in the textile sector of Tamilnadu, many respondents shared that the Trade union has a strategic role to play in empowering workers and recommended that the unions should work to build their own capacity, play a constructive role in organizing workers, and moreover, work independently.
- vi. *Organising and empowering workers:* Unionisation of workers is the key as it empowers them and brings sustainability. Hence, one of the key focus areas of future programmes should be empowering workers through organizing and capacity building, both at source and destination areas. Raising awareness of workers on rights and entitlements, different acts and policies, Social Security benefits, fair recruitment methods, safe migration, education for

children of migrant workers etc should be one of the key intervention areas of future programmes.

- vii. *Reviewing Purchasing Practices of Brands:* Purchasing practice of the buyers which generally leads to excess overtime and other negative working environment including abuse, needs to be studied and modified. Long term contracts with the factories will ensure better cooperation and implementation.
 - viii. *Encouraging Transparency in supply chains of Brands:* Many respondents shared that lack of transparency in the supply chain of brands is one of the contributing factors for rights violation in the mills and factories of Tamilnadu. Most of the brands/buyers focus largely on Tier 1 factories with respect to compliances. As a result, a large number of workers who are still part of the supply chain of brands/buyers, remain out of coverage. It is therefore recommended that brands work in a comprehensive and transparent manner instead of working in shallows. There should be adequate pressure on brands from industry, civil society and government for transparent supply chains and decent working conditions. If workers are happy, productivity increases, quality enhances, positively impacting business.
 - ix. *Strict implementation of Labour Laws and other related rules by the government:* Another key factor for the poor situation is lack of strict enforcement of different laws and acts governing the factories and workers. Government is a critical stakeholder. Hence, if Government does not keep their commitment and remain accountable, the situation of workers will continue to worsen.
 - x. *Proactive role by Government in multistakeholder initiatives:* Though there have been different multi-stakeholders' initiatives working in Tamilnadu that have tried to address the situation in a collaborative manner, it is realized that they are mostly NGO-led and moreover, in all these discourses, government seems to be missing. It is, therefore, recommended to have credible organisations like ILO as well as government, which will help streamlining issues like low wages, overtime, harassment and overwork, random suicides (among women workers) as well as work to avoid any possible victimisation by the industry.
 - xi. *Focus on the domestic market and smaller power looms:* Many of our respondents also recommended that any future programmes intended to work in the landscape should focus more on the domestic market as well as small power looms.
 - xii. *Maintaining ethics and transparency in working together:* During the study, it was recognized by all stakeholders that working through a multi-stakeholders or a unified approach is the solution to the problem. However, they also suggested that in doing so, it is important to maintain ethics and transparency to achieve best results. In this context, it is as important for NGOs/CSOs to work with an ideological perspective, brands to have a transparent supply chain and government to be proactive in enforcing laws; as it is for industry to take complete ownership.
-