

Evaluation of phase I of ETI's TNMS programme

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Content

Executive summary	4
1. Introduction	9
1.1 Background of the TNMS programme	9
1.2 This mid-term review	9
1.3 Structure of the report	10
2. Methodology	11
2.1 Overview	11
2.2 Focus Group Discussions (FGDs) and interviews	11
2.3 Limitations of the approach used	13
3. Progress towards objectives	14
3.1 Context: relevant developments in Tamil Nadu and the textiles/ garment sector	14
3.2 Progress at mill/ factory level	15
3.3 Progress at community level	24
3.4 Progress of policy reform	31
3.5 Insights from stakeholder interviews	34
4. Conclusions and recommendations	40
4.1 Conclusions	40
4.2 Recommendations	42
Appendices	45

Executive summary

Introduction

Aidenvironment conducted a mid-term review of Ethical Trading Initiative's (ETI) Tamil Nadu Multi-Stakeholder (TNMS)-programme. The TNMS-programme consists of three components:

1. A **worker peer group programme (WPGP)** at mill/factory-level, aiming to establish mechanisms for workers to exercise their rights within factories and mills. An important element of the worker peer group programme is training of workers by their peers (so called Peer Educators).

The Worker Peer Group Programme consists of two phases:

- a. **Phase I:** modules related to health and well-being
- b. **Phase II:** this phase builds on the results of phase I and is designed to address rights and responsibilities¹.

Please note that the division between phase I and phase II is not as dichotomous as it may seem. Some health issues are also labour rights issues. For example, this is the case when working on 'Occupational Health and Safety'².

2. A **community outreach programme**, educating and raising awareness within communities where recruitment takes place. Community outreach work is implemented by local NGO-partners.
3. A **policy and legislative reform** effort, aiming to tackle policy gaps at industry level, that allow exploitative practices (like the Sumangali scheme) to exist.

Aidenvironment assessed the results of phase I aiming to inform implementation of the second part of the programme. Data collection and field visits for this research were carried out between August 15 and September 26, 2016.

Methodology

We conducted nine FGDs with 102 women workers in five different units (4 spinning mills and 1 garment factory). We conducted 30 KIIs with 32 key informants from several stakeholder groups. To complement our findings from the field we reviewed existing literature on the textile and garment industry in Tamil Nadu, and literature on design and management of multi stakeholder initiatives. Also, we reviewed internal documentation from ETI.

Results

Worker Peer Group Programme

- The TNMS WPG programme delivered positive results at mill/factory level, for women workers and mill/factory management.

In all visited units, women workers reported that they benefitted from phase I of the WPGP. Main reported benefits were in line with the health and well-being focus of phase I: improved health, increased knowledge of a balanced diet and nutritious food, improved use of Personal Protective Equipment (PPE). Also, workers reported they felt more knowledgeable and were capable to share their knowledge with others (friends and family back home).

The TNMS programme also successfully sensitized managers to the needs of young women workers. Main reported benefits were in line with phase I of the programme: managers and women workers reported improved access to safe drinking water and sanitary facilities at the workplace, and increased quality of meals, improved accommodation and sanitary facilities in company hostels.

¹ ETI (2016). Terms of Reference for the External Evaluation of Phase I of ETI's Tamil Nadu Multi-Stakeholder Programme.

² Occupational Health and Safety-objectives are (i) A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards, (ii) Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided and (iii) Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

- The TNMS WPG programme is behind schedule in achieving its quantitative objectives. By July 2016, the TNMS programme has been implemented in 8 units (6 spinning mills and 2 garment factories). In these units, mainly phase I activities were carried out. This means that focus was on modules related to health and well-being. Phase II activities (building on phase I, addressing workers' rights and responsibilities) have just started or are about to start. Conversations with 7 units are ongoing, discussing implementation of the programme. Implementation in these units is yet to start.
- The speed of programme implementation may increase after recent programme adaptations. Partly in response to the expressed critiques of being slow to deliver results, ETI made some adaptations to its approach that may result in quicker delivery of results.

Community outreach programme

- The community outreach programme is implemented in eight districts within Tamil Nadu, by eight NGO-partners. So far, the programme has reached 163,365 community members, of which 121,300 female community members. In addition, 11,485 community members (females and parents) reported on increased knowledge of labour laws and worker rights.
- The community outreach programme contributed to increased awareness and knowledge of community members about labour laws and worker rights. In all targeted communities, community members (current, potential and former workers) reported increased knowledge of their rights. However, we found no evidence that this increased awareness is also leading to community members claiming their rights or changing their behaviour. Community members report feeling helpless and do not know how to deal with violations of worker rights. Communities targeted by the community outreach programme feel that they do not have a real alternative but to send their young women to work in mills. This is even true when they know their rights will be violated (for example when overtime is not properly compensated, when they do not receive ESI or PF, or when they face difficulties collecting their PF-dues after the stop working in the mill/factories).
- Results for recruiters are mixed: some NGO-partners signal that recruiters are not yet ready to commit to ethical practices, while other NGO-partners report that targeted recruiters are willing to commit to more ethical practices. Recruiters in sourcing communities do not feel enabled to raise issues regarding worker rights in mills.

Policy reform effort

- NGO-partners reached 1,858 government representatives with sensitization programmes or interactions.
- We did not find any evidence that local/ regional government representatives put pressure on national governments to pass the law on reduction of length of apprenticeships in Tamil Nadu. NGO-partner Vaan Muhil Trust reported that government representatives agreed to facilitate passing a law against fraudulent recruitment practices. It is unknown if this law has passed and what the role of Vaan Muhil has been. So, it remains unclear if local government representatives and agents are capable to influence the law or to influence national governments to change the law.

Conclusions

Effectiveness and impact

We conclude that the TNMS programme is partly on track to deliver its 2017 objectives related to effectiveness and impact.

- The WPGP is unique in its proven ability to access mills and factories, to gain access to workers and to create positive impacts for workers. Recent adaptations to the programme (e.g. reducing the number of health-related modules from 6 to 2) increase the probability that the programme will be able to deliver results faster. The transition of phase I to phase II, remains a point of concern for TNMS stakeholders.

- Regarding the community outreach programme, we conclude that the programme is capable to raise awareness and increase knowledge of worker rights and labour laws in community members. However, currently community members are not (yet) equipped to change their behaviour and to claim their rights. Further, we found no evidence that recruiters are currently in a position to address working conditions in mills and factories. The community outreach programme may increase its impact by strengthening guidance and support to community members on how to translate increased awareness and knowledge into changes in behaviour.
- The policy reform efforts are not on track to deliver intended results. So far, involvement of local government representatives has been largely instrumental (it is used to gain access to community members, and not used as an independent strand of the programme). It remains uncertain if local government representatives can influence higher-level governmental bodies. An alternative approach (for example, the Amsterdam Coalition approach, that is specifically designed to target higher level governments) may prove to be a more effective choice.

Relevance

It is too early to judge the programme's relevance for contributing to the elimination of exploitative practices in the textiles and garment sector in Tamil Nadu.

So far, the Worker Peer Group programme convincingly delivered proof of concept of phase I: we found evidence that phase I led to improved health and wellbeing in women workers while touching on basic labour rights. However, we found no consistent evidence yet supporting the assumption that phase I is a necessary or sufficient condition for phase II (stronger focus on rights and responsibilities).

The community outreach programme of the TNMS programme proved to be able to increase awareness and knowledge about workers' rights, ethical recruitment and labour laws, in communities and recruitment agents. But raising awareness and increasing knowledge is not yet translated into enabling communities to claim their rights. Some NGO-partners assisted community members in this regard, for example by helping them to retrieve PF-due or outstanding wages. However, a consistent, programmatic effort to proceed from increased awareness/ knowledge towards enabling community members to claim their rights, is needed but not yet provided by the TNMS programme.

Efficiency

We conclude that the TNMS-programme is partly able to deliver its intended results according to planning. The TNMS WPGP is behind schedule in achieving its objectives within its original timeframe, but it is plausible to assume that the WPGP can deliver results quicker after implementation of adaptations to the programme's approach. The community outreach programme is partly on track to deliver its intended results according to planning. Not all target groups were reached in all targeted districts. NGO-partners mentioned that the available budget is not sufficient.

There is a call to renegotiate the timeframe for the remaining part of the programme. Several stakeholders have argued that setting a 5-year timeline for a transformative programme such as the TNMS-programme is not realistic. Other stakeholders however, would value a more precise planning of the process of transformation.

Sustainability

We conclude that it is plausible that changes in women workers, brought about by the WPGP, are sustainable. The programme increased women's awareness of health, increased their knowledge of healthy behaviour, and provided them with the tools to sustain that behaviour in the absence of the programme (for example in their home communities). Also, we conclude that it is plausible that changes in mill/factory management are sustainable. Managers link the positive impacts of the WPGP for women workers to positive impacts for the business (reduced absenteeism, reduced medical costs, less food waste). That makes it plausible that they will continue working this way, in absence of the programme. The community outreach programme has resulted in changes in awareness and knowledge at community level, but has not (yet) led to consistent behaviour changes yet. Interactions between NGO-partners and community members have been brief (incidental sensitization programmes) and

community members experience a lack of clear behaviour alternatives. Therefore, we conclude that to date, changes in community members cannot yet be labeled 'sustainable'.

Recommendations

Strengthen communication

ETI can strengthen the flow of communication with its stakeholders by:

- diversifying information to fit different needs of different stakeholders
- renegotiate the decision-making processes with the TNMS Advisory Group and the Local Consultative Committee
- manage expectations about roles and responsibilities in the programme
- facilitate learning and sharing by stakeholders by providing them with access to relevant learning/ sharing platform and by regularly updating/ reminding them on the use of these platforms.

Other measures may strengthen communication on results and progress:

- communicate the business case for the WPGP
- work with WPGP ambassadors from the business
- celebrate small successes to maintain stakeholder commitment in a project with a long-term results horizon (for example, use milestones identified in a revised Theory of Change, see below).

Optimize the use of the multi stakeholder environment

ETI has access to a wealth of expertise, knowledge and practical assistance through the people mobilized by the TNMS programme. Effective use of this multi stakeholder environment is challenging, but can create greater impact, build bridges and build/ maintain commitment. Examples are:

- Develop a strategy on how to use on the expertise of each stakeholder. This requires a thorough mapping of current stakeholders' expertise and a plan of action on how to use this.
- Balance stakeholder interests. The TNMS programme appeals to a lot of knowledgeable stakeholders who are deeply committed to contribute to the elimination of exploitative practices in the garment and textile industry in Tamil Nadu. Although not all stakeholders have an equal say in the programme, it is important that stakeholders feel valued and that they receive adequate feedback on how their input is integrated into the programme.
- Adapt to a changing landscape in Tamil Nadu by actively exploring the connection or potential complementarity of new stakeholders/ projects. The textiles and garment industry is of interest for a growing number of stakeholders. Keeping contact with these new stakeholders may strengthen the (implementation of the) TNMS programme. For example, the Amsterdam Coalition (a relatively new stakeholder focusing on influencing and lobbying governments) may be able to strengthen the policy reform strand of the TNMS programme in the future. Similarly, the WPGP of the TNMS programme may be of interest for the Amsterdam Coalition as a practical tool when they start to affect workplaces.

Optimize the use of ETI's position as trading initiative

ETI has used its unique position as trade initiative and leverage from brands to create entrance to workplaces (spinning mills and garment factories) that were inaccessible for other stakeholders. This unique position can be optimized even further to create greater impact and upscaling in the sector. For example, ETI can:

- Bridge brands and workplaces: organize increased leverage from brands to get mills and factories to sign up for the TNMS programme.
- Bridge between brands: organize greater transparency in the supply chain by supporting brands in collective efforts to map value chains and suppliers.
- Actively position the TNMS programme in a changing stakeholder landscape: connect to other initiatives in the region/ sector.

Provide stronger guidance for the journey towards sector transformation

We believe that, based on the results achieved and lessons learned so far, it is important for ETI to reformulate the programme's Theory of Change. The revised Theory of Change should focus at sector transformation as the final horizon, and demonstrate pathways towards this final goal. This revised Theory of Change can describe separate pathways of change for separate groups (e.g. a pathway for young women workers, a pathway for managers, but also a pathway for brands).

This transformation focused Theory of Change helps to understand change as a non-linear process, informs the renegotiation of a timeframe for the remaining part of the programme and guides the development of a monitoring framework towards sector transformation.

Picture 1. Focus Group Discussion with women workers in unit 1.



1. Introduction

1.1 Background of the TNMS programme

In 2012, the Ethical Trading Initiative (ETI) launched the 5-year Tamil Nadu Multi Stakeholder (TNMS) programme. The TNMS-programme aims to contribute to the elimination of exploitative practices in the garment/ textile industry in the Tamil Nadu region in Southern India, by implementing a replicable model that promotes ethical recruitment and retention of young women into the sector. To achieve this objective, the programme has three sub objectives:

- Strengthening the ability of women workers and local employers to address issues together
- Raising awareness within recruitment communities
- Driving change in recruitment policies and practices.

The TNMS-programme consists of three components:

1. A **worker peer group programme (WPGP)** at mill level, aiming to establish mechanisms for workers to exercise their rights within factories and mills. An important element of the worker peer group programme is training of workers by their peers (so called Peer Educators). The worker peer group programme consists of two phases:

- a. **Phase I:** modules related to health and well-being
- b. **Phase II:** this phase builds on the results of phase I and is designed to address rights and responsibilities³.

Please note that the division between phase I and phase II is not as dichotomous as it may seem. Rights are also -although implicitly- addressed when working on health-related aspects. For example: when training women workers on personal hygiene, related aspects like access to clean toilet facilities and potable water are also addressed.

2. A **community outreach programme**, educating and raising awareness within communities where recruitment takes place. Community outreach work is implemented by local NGO-partners.

3. A **policy and legislative reform** effort, aiming to tackle policy gaps at industry level, that allow exploitative practices (like the Sumangali scheme) to exist.

1.2 This mid-term review

Aidenvironment conducted a mid-term review of the TNMS-programme, assessing the results of phase I and informing implementation of the second part of the programme. Data collection and field visits for this research were carried out between August 15 and September 26, 2016.

The mid-term review was led by Martine van Schaik, a senior consultant from Aidenvironment. Field visits and interviews with local key informants were conducted by Tina Koshy, an Indian evaluator and consultant. Interviews with international stakeholders were conducted by Skype by Martine van Schaik.

The main objective of this mid-term review is to evaluate the results of phase I and to inform the implementation of phase II of the TNMS programme.

The key questions of this evaluation are:

1. What effects can be observed at
 - a. Mill level (young women workers and mill management)
 - b. Community level (parents, former workers, students)

³ ETI (2016). Terms of Reference for the External Evaluation of Phase I of ETI's Tamil Nadu Multi-Stakeholder Programme.

- c. Policy level
2. How has the TNMS project contributed to these changes?
3. Is ETI on track in delivering outcomes and impacts?
4. How can program implementation be improved in order to achieve programme objectives?

1.3 Structure of the report

For an overview of research methodology, we refer the reader to Chapter 2. Protocols for Focus Group Discussions and checklists for Key Informant Interviews are provided in Annex II.

In Chapter 3 we present mid-term results of the programme. We describe progress of the Worker Peer Group Programme, progress at community levels and progress of policy reform efforts. For each of these three levels, we compare findings from the field to programme objectives and progress markers as described in ETI documentation⁴ and we describe how ETI has contributed to observed changes. In Chapter 4 we present our conclusions on progress of the TNMS programme towards its objectives. Also, we provide recommendations for implementation of the second part of the programme.

Picture 2. Focus Group Discussion with women workers in unit 2.



⁴ ETI Logframe and ETI Outcome Map

2. Methodology

2.1 Overview

We conducted nine FGDs with 102 women workers in five different units (4 spinning mills and 1 garment factory). We conducted 28 KIIs with 30 key informants from several stakeholder groups. To complement our findings from the field we reviewed existing literature on the textile and garment industry in Tamil Nadu, and literature on design and management of multi stakeholder initiatives. Also, we reviewed internal documentation from ETI (logframe, outcome maps, quarterly updates etc.).

2.2 Focus Group Discussions (FGDs) and interviews

2.2.1 FGDs with Women workers

In total, 102 women workers participated in nine FGDs in five different units. Below, we present the number of interviewed women workers per unit, broken down in various relevant background characteristics:

- Origins of worker: number of workers that come from Tamil Nadu and number of workers that come from other states (also referred to as migrant workers)
- Peer Educators and peers: number of workers that are currently functioning as peer educator (delivering the WPGP to peers) and the number of workers (peers) receiving the WPGP through peer educators.
- Marital status: number of married workers and number of unmarried workers
- Age of workers
- Living arrangements: number of workers living in a company hostel and number of day workers that do not stay in a company hostel.

Table 1: Number of workers participating in FGDs, broken down for relevant background variables

	Unit 1 (spinning mill) 2 FGDs	Unit 2 (spinning mill) 2 FGDs	Unit 3 (spinning mill) 1 FGD	Unit 4 (spinning mill) 2 FGDs	Unit 5 (garment factory) 2 FGDs	Total
Total number of workers	20	24	13	20	25	102
Origins of workers						
Workers from Tamil Nadu	11	14	12	12	14	63
Workers from other states	9	10	1	8	11	39
Peer Educators and peers						
Peer Educators	4	5	3	6	4	22
Peers	16	19	10	14	21	80
Marital status						
Married workers	0	7	0	6	14	27
Unmarried workers	20	17	13	14	11	75
Age						

Workers, aged 18+	20	24	12	20	25	101
Workers, aged 15-17	0	0	1	0	0	1
Living arrangements						
Workers living in a hostel	20	19	13	8	7	67
Day workers	0	5	0	12	18	35

In units 1, 2, 4 and 5 we conducted 2 separate Focus Groups Discussions: in unit 1, 2 and 5, we conducted FGDs separately for workers from Tamil Nadu and for migrant workers; in spinning mill 4, we conducted a FGD separately for workers living in the company hostel and day workers.

During the FGDs, the following topics were discussed with women workers: (i) working environment, (ii) wages, (iii) health, (iv) housing/ hostel, (v) interaction with supervisors. We asked workers about their opinion on the current situation, on recent changes and about the role of the TNMS programme. The protocols for the FGDs and the role-plays were developed in cooperation with ETI, and are provided in Annex II.

Note that the selected units for field visits were all in advanced stages of programme implementation. In other, less advanced units, the programme had not yet reached peer educators or peers.

2.2.2 FGDs with Community members

To assess the effectiveness of the community outreach work, we conducted 6 FGDs in 3 districts that are main source districts for new recruits for mills and factories participating in the TNMS programme. The table below provides an overview.

Table 2: Overview of respondents in community FGDs

District	NGO partner	group	Block/ village	Number of participants	Total
Cuddalore	READ	Community members	Cuddalore	20	33
		Students (girls, XI standard)	Tehsil – Kattumannark oil / Reddiyur	10	
		Teachers		3	
Salem	K-ROPE	Community members	Vallapady block / Valapadi town	13	13
Dharmapuri	DEEPS	Community members	Porathur	17	20
		Recruitment agents	Dharmapuri	3	
					66

2.2.3 Key Informants Interviews (KIIs)

We conducted 30 personal interviews with 32 key informants from several informant groups. The table below provides an overview.

Table 3: Number of key informants per informant group

Informant group	Number of respondents
ETI	8
Brands	2
NGO-partners	3
Recruiters	3
Mill/ factory managers	4
Peer educators	3
Trade Unions	3
Other stakeholders (experts, international NGOs)	6
Total	32

* 2 interviews were conducted with 2 respondents. So, we conducted 30 interviews, but spoke with 32 key informants.

A complete list of all key informants is provided in Annex III.

2.2.4 Desk and literature research

For this research, we reviewed ETI's project and monitoring information and performed a desk study of relevant external literature. A list of references is provided in Annex IV.

2.3 Limitations of the approach used

- The findings from field visits at mill/ factory level cannot necessarily be generalized to other mills or factories. The mill/factory sample represents mainly early adopters of the TNMS programme. This is largely because later participants of the programme had not yet implemented phase I activities that could be evaluated.
- Programme implementation and targeted groups of the community outreach programme differed between districts. For example, NGO-partner READ Foundation chose to focus on female students in school and on collecting payments for workers through legal support based on data they compiled. NGO-partner DEEPS took a different route; they used an existing network of six locally operating partners to achieve deeper penetration in the six blocks they focused on. Each NGO-partner capitalized on their strength to implement the programme. This approach allowed each NGO to use their core expertise and strength, but at the same time is making it difficult to compare results of approaches chosen by NGO-partners
- Contribution of observed changes in communities and policy, to ETI's interventions is complex, since these programmes work in dynamic social contexts with multiple influencers.

3. Progress towards objectives

In this chapter, we will present our findings and compare these to the programme's objectives as described in the TNMS Outcome map⁵. We will present the results in three sections:

1. Progress (mid-term results and process) of the Worker Peer Group Programme at mill / factory level
2. Progress (mid-term results and process) at community level
3. Progress (mid-term results and process) of the policy reform efforts.

First, we describe the relevant context changes (section 3.1) and highlight key elements of the WPGP (section 3.2).

3.1 Context: relevant developments in Tamil Nadu and the textiles/ garment sector

3.1.1 Market development

The market for yarn is low for the second consecutive year. As a result, employment opportunities for mill and factory workers are decreasing. Some mills/ garment factories chose not to replace workers that have left. This may increase competition for jobs in the textile and garment industry. Mill/ factory managers mentioned that it is increasingly difficult for them to recruit and retain workers.

3.1.2 Worker related issues: retention and migration

The workforce currently working in the textile and garment industry has significantly changed compared to some years ago. Changes in the workforce are:

- Increase in women workers: the number of women in the textiles and garments workforces has grown steadily over the last decades. Where in the 1960s and 1970s the workforce consisted mostly out of male workers, nowadays approximately 60% is female⁶. Experts explain this feminization of the workforce as follows: (i) factories and mills needed additional workers to be able to deliver at peak demands, (ii) female workers are perceived as being more compliant and more docile compared to male workers, (iii) parents of young females perceive mills and factories as safe places to stay, where girls can contribute to their family's income while awaiting their marriage arrangements.
- Increase of migrant workers: increasing numbers of out-of-state workers (both male and female) come to Tamil Nadu to seek employment in the textile and garment industry. These migrant workers mostly come from rural and poor communities. Today, mill work is not considered good employment, therefore only the most needy come and seek employment in this sector.
- Increase of temporary workers: women workers in the textile and garment industry tend to quit working when they get married. Since the current workforce in the textile and garment industry consists for a large part of young, unmarried women, turnover rate is high.
- Increase in vulnerable and poor workers: employment in mills is unpopular and ranks just above the least preferred job as unskilled agricultural labour. Therefore, only the most needy workers come to work in mills to seek employment.

⁵ TNMS outcome map, updated version 24.03.15

⁶ Sisters for Change (2016). Eliminating violence against women at work. Making sexual harassment laws real for Karnataka's women garment workers. Available via http://wo-men.nl/wp-content/uploads/2016/06/2016-06-SFC_WomenatWork_FullReport_June2016.pdf

3.1.3 Wages

Recently, the government has announced a raise in wages for apprentices in the textile industry. Effective from April 1st, 2016, the minimum wage of apprentices is Rs. 322.30 per day (Rs. 126.50 basic wages and Rs. 195.80 per day Dearness Allowance)⁷.

3.1.4 International awareness and other initiatives addressing worker rights in the sector

- Since the first reports of international NGOs on abuse and exploitation of young women workers in the textiles and garment industry in Tamil Nadu were published, the sector gained a lot of attention from brands, NGOs and trade unions.
 - *Brands* that are operating in Tamil Nadu, wish to address issues in the sector because they have a vast strategic and commercial interest in the region. The possibility of exposure of issues in their supply chain are exposed, poses serious reputational risks to the business.
 - *NGOs* are eager to work with women workers to improve their working conditions. However, women workers in India are hard to reach. Young workers often live in company hostels that are not accessible for outsiders and young women workers are not allowed to leave the hostel by themselves.
 - *Trade unions* are used to finding their members among local male, permanent workers. Now, they are facing an entirely different workforce consisting of young women and (both male and female) migrants, working temporarily in mills/ factories. Trade unions are struggling to find their place in the new dynamics of the textile and garment sector in Tamil Nadu.
- The growing international awareness of abuse and exploitation in the textile and garment industry has inspired other initiatives (besides the TNMS-programme) in the region:
 - It has led several brands to address issues in their supply chain. For example, Mothercare, one of the participating brands of the TNMS programme, initiated social audit in all their supplying mills/ factories and have initiated projects in workplace to support women workers.
 - Currently, the Amsterdam Coalition, a new coalition of brands, is working to launch their programme aiming to influence national governments to develop legislation against exploitative practices in the sector.
 - The Varner Group in Norway is setting an example by publishing a list of supplying factories⁸.

3.2 Progress at mill/ factory level

The Worker Peer Group Programme (WPGP) is the main activity of the TNMS programme that aims to bring about change at mill/ factory level. We begin this section by a review of the activities conducted as part of the WPGP, followed by a review of the process of project implementation, a description of its results for women workers and mill/ factory management and an analysis of the project contribution.

3.2.1 The Worker Peer Group Programme

The Worker Peer Group Programme, is based on the HERproject of BSR (Business for Social Responsibility, a global operating NGO⁹) and consists of six health related modules:

1. nutrition
2. reproductive health, personal and menstrual hygiene
3. ergonomics
4. maternal and child health
5. STI, HIV/AIDS and Hepatitis

⁷ TASMA (2016). Circular No. 101/ 2015-16.

⁸ List of suppliers available on the corporate website: <http://varner.com/globalassets/images/sustainability/documents/public-factory-list-june-2016.pdf>

⁹ For more background information visit BSRs website at <https://www.bsr.org/en/>.

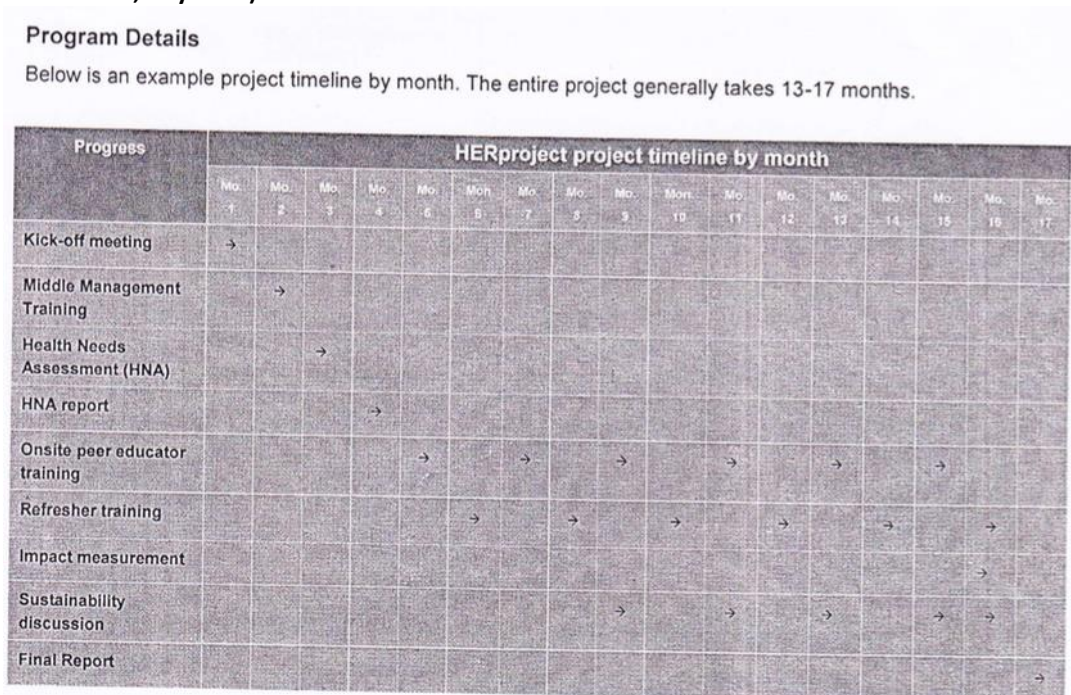
6. Non-communicable diseases

BSR is not involved in implementation of the HERproject for the TNMS programme. The PSG Institute of Medical Sciences & Research, being BSRs HERproject NGO-partner in Tamil Nadu, was responsible for delivering these six health-related modules in mills and factories¹⁰.

The implementation of the HERproject (phase I of the TNMS programme) is divided into seven steps and generally takes 13 to 17 months to complete (see scan of timeline below). Steps of the HERproject are:

1. Supplier recruitment: recruitment of supplying mills/ factories to participate in the programme (ETI is leading this step);
2. Project kick off and orientation: organizing and conducting kick-off event with participants from recruited mills/ factories, PSG, buyer representatives (PSG is lead);
3. Baseline survey: needs assessment on the mill/factory to determine health-needs to be addressed during the programme (PSG is lead);
4. Middle management engagement: conducting programme for middle management, explaining activities and exploring the role of middle management (PSG is lead);
5. Peer Health Education training: training of Peer Educators (PSG is lead);
6. Factory/ mill based awareness raising: work plan per mill/ factory for peer education training (PSG leads by overseeing progress of Peer Educator's training)
7. Impact measurement and closing meeting: organizing and conducting endline survey (PSG is lead).

Figure 1. Steps and timeline of the HERproject timeline (Scan from MOU for the HERproject between ETI and BSR, July 2013)¹¹.



A more detailed list of activities during phase I of the WPGP can be found in Annex V.

¹⁰ For background information on PSG, please visit PSGs website at <http://www.psgimsr.ac.in>.

¹¹ HERproject MOU

Costs of the HERproject, as agreed to in the MOU between ETI and BSR, is fixed at 6,000 USD per mill/factory (maximum of 2,000 women workers per mill/factory). However, in 2016 costs went up significantly to 4,000 USD as annual fee and 9,500 USD per mill.

3.2.2 Process of programme implementation

Point of departure: hostile environment and low-trust between stakeholders

The first multi stakeholder meeting in 2012 was characterized as a hostile environment, with low levels of trust and even mistrust between stakeholders. One participant of this meeting said: “people were walking away from the room, could not stand to be in the same room with each other. When we had a stakeholder meeting last month, no one was walking away! Of course, there is still tension, but at least we are talking to each other”.

Timeline

As illustrated in Table 4, by July 2016 the TNMS Worker Peer Group Programme has been implemented in 8 units (6 spinning mills and 2 garment factories). In these units, mainly phase I activities were carried out. Phase II activities (building on phase I, addressing workers’ rights and labour rights issues) have just started or are about to start.

Conversations with an additional 7 units are on-going, discussing implementation of the programme. Implementation in these units is yet to start.

The WPGP was expected to take up to 13 to 17 months to complete. In most participating mills/factories this timeline was not feasible. Key informants from ETI mentioned several causes for this delay:

- Decision-making in mills is sometimes slow. For example, sometimes it takes a long time before mill/factory management reaches the decision when to go ahead with the programme. For example; in one mill it took nine months (instead of projected one month) to move from step 1 (kick off meeting) to step 2 (training of middle management).
- Recruitment takes a long time.
- Step-by-step approach (“First, we allowed Peer Educator to perform the next module only after the first ones were delivered. This caused delay in delivering.”)
- Limited availability of the PSG Institute of Medical Sciences & Research (implementing NGO-partner) to conduct initial training of Peer Educators

This raises the question if the HERproject was sufficiently adapted to the low-trust environment of the Tamil Nadu textile and garment industry.

3.2.3 Progress towards objectives at mill/factory level

Tables 4 and 5 (see below) provide an overview of the programme’s objectives (as described in the TNMS log frame and Outcome Map) and a brief description of the mid-term situation as we observed.

Table 4: Objectives for the WPGP, in reaching mills/factories and women workers

Quantitative objectives ¹²	Mid-term realization
1. Establishing WPGs in 15 mills/factories, enabling 5,000 workers to voice their concerns and exercise their rights.	<p>1. In total 8 mills/ factories are currently participating in the programme and have implemented WPGPs</p> <p>2. Through these 8 units, approximately 3,490 women workers are reached</p> <p>3. In these 8 units, mainly phase I activities have been implemented, phase II activities are about to start</p>

¹² ETI (2014). TNMS Logframe - August 2014.

	<p>4. Another 7 mills/ factories are in the preliminary phase of participation and have started/ scheduled conversations with TNMS staff, discussing implementation of phase I activities.</p> <p>5. Total number of women workers in these 15 units: 5,794¹³</p>
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Table 5: Progress markers for measuring progress in women workers at mill level¹⁴

Young women workers		
Objectives		Mid term realization
Expected progress	1. Workers participating in Worker Peer Group Programmes (WPGPs)	1. In all visited units, women workers reported that they were able to participate in the WPGP
	2. Workers demonstrating improved understanding of their employment rights and workplace facilities	2. In all visited units our survey gives plausible evidence of positive effects for all workers of the TNMS-programme on their working environment and on availability of workplace facilities. Typically, they report (i) TV hall –separate halls per language group-, classes like yoga, tailoring and dance, library in hostels, (ii) cleaner bathroom and workplace, (iii) increased use and knowledge of Protective Personal Equipment (PPE, for example availability of coats instead of aprons, use of masks and earplugs), and (iv) better availability of piped drinking water. In all visited workplace workers had detailed knowledge about their wages and frequency of raises in wage.
	3. Knowing what services are available to them	3. In all visited units our survey gives plausible evidence that all workers know what services there are available for them. Workers report going to committees (e.g. canteen committee, grievance committee) or to go to the nurse or hospital in case they need medical attention. In 3 of the 5 visited units, workers have ESI-cards in their possession, in unit 2, ESI cards were kept in an office, in 1 workplace workers did not have an ESI-card because their workplace was in an area that was not covered by ESI.
	4. Demonstrating improved understanding of health and well-being	4. In all visited units, our survey gives plausible evidence of all women workers having positive effects of the TNMS-programme on their health and well-being. Workers relate this to the quality of food and quality of their accommodation in company hostels. Workers also mention that they cut down on snacking habits and do not waste their vegetables anymore. Workers feel proud about their improved knowledge of health and nutrition. Several workers reported being called <i>Kutty Doctors</i> (meaning <i>little doctors</i>) by their friends and families at home.

¹³ ETI (no date). TNMS Nalam programme – End of phase I – internal assessment, page 1.

¹⁴ TNMS outcome map, updated version 24.03.15

Preferred progress	1. Using workplace mechanisms to voice their concerns	1. Our survey gives plausible evidence that all workers of the visited units, know about different committees they can use or join to voice their concerns. For example, workers of unit 2 named 7 committees that were operational at the workplace: work committee, anti-harassment committee, canteen committee, grievances committee, awareness committee, health and safety committee. Six workers were actual committee-members, 1 worker was a member of 2 committees. In units 2 and 4 a grievances hotline was created: women workers can call this number and have their grievance recorded, without mentioning name, section or other personal information. All interviewed respondents of unit 2 and 4 are familiar with this hotline (7373757539)
	2. Challenging employers when their rights are not being respected	2. All workers reported that they did not have any grievances or issues regarding not respecting rights
	3. Using legal, health, workers' rights services	3. Several workers from 3 visited units reported that they went to the ESI-hospital for medical care.
	4. Acting in ways that maintain their health and wellbeing	4. All workers reported increased knowledge and changing behaviours to maintain improved health and wellbeing. Workers have changed their eating habits (snack less, eat more nutritious foods, don't waste vegetables, improved personal/menstrual hygiene).
	5. Having better communication with managers	5. In all visited units all workers reported having no issues with managers or supervisors. In most units interactions with managers and supervisors are infrequent. Workers mostly deal with monitors. In unit 1 and 2, workers think that their working relationships with supervisors and monitors have improved because of the TNMS programme. In one unit, workers mentioned that they call supervisors <i>Anna</i> (meaning big brother) or <i>Thambi</i> (younger brother) depending on their age. Before the TNMS programme, they called them 'sir'. In all units, workers mentioned that they feel they can go to supervisors in case there is something they need addressed. In unit 3, workers directly addressed management if there were issues that need to be resolved.
Ideal progress	1. Encouraging fellow workers to voice their concerns	1. Workplace mechanisms, like worker committees, encourage workers to voice their concerns. In all visited units, workers reported to be familiar with, and know how to access these committees. In unit 2, an awareness committee actively reaches out to new workers to help them settle in and support them to use available mechanisms to voice their concerns. We found no evidence that workers encouraged other to voice their concerns through other mechanisms (e.g. joining or forming a trade union).
	2. Forming or joining trade unions	2. We found no evidence that workers joined or formed trade unions.
	3. Lobbying employers and government for improved labour policies and laws	3. We found no evidence of workers lobbying employers and governments for improved labour policies and laws.

	4. Demonstrating leadership by engaging constructively working with employers to make the workplace better for workers and the business	4. In all visited units, workers reported using company committees to voice their concerns and to make the workplace better. For example: in one mill workers mentioned that installing more fans might help productivity because workers would suffer less from heat.
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Observed and reported progress is in line with the expected progress markers as described in the TNMS Outcome Map. Several preferred progress markers were realized with women workers. There is no consistent evidence to prove progress towards the ideal progress markers.

We listed workers' opinions in Box 1 below.

Box 1. Results of the WPGP on women workers, as observed by women workers.

Results expressed and observed by women workers:

- I am not only looking after myself, I am also helping my family
- I am not only earning, I also have the opportunity to study and improve myself
- I am learning how to cope with exposure to the outside world– I am becoming mature.
- Learning so much about myself, and being able to share it with others, both here and at home. Being able to influence my sister and mother as well as friends
- Earlier, we used to buy a lot of chips, snacks, biriyani and noodles. Now, after learning about nutrition and balanced meals, we are careful to eat more greens, vegetables and fruits.
- Bathrooms cleaner now, as there are sufficient cleaning staff compared to earlier.
- A peer educator, who is also a nurse, describes the changes she has seen in women workers after the WPGP: “The difference I see in the girls is tremendous. Earlier they just sat around when they got free time. Now you will hardly see any girl sitting around staring vacantly. They are busy! Changes that I have seen in girls:
 - * Posture. They sit and stand straighter
 - * Earlier, I never saw a worker open a book. Now they refer to these modules constantly, are busy copying them into note books. When they go home, they use these notes to share with their friends and family.
 - * Now female workers are careful about wrapping their pads and actually putting them into dustbins. Earlier you’d find them thrown around dustbins. They did not have the discipline to put them in.
 - * Fights among girls living in the hostel have reduced drastically. Earlier raised voices and heated arguments was the norm. Now voices are more moderate, you will hardly hear screaming.
 - * At the canteen, girls used to put their food waste outside their plates, on to the table itself. This is probably what they have seen at home. Here we now provide waste bowls on each table in to which girls drop their food waste.
 - * A great improvement is seen in the number of times girls wash their hands, thoroughly.
 - * The girls used to waste most of the vegetables in their food earlier. Now they eat all that. Carrots were not something edible as far as they were concerned. Now they are consumed.
 - * The number of snack packets bought has come down drastically.
 - * Earlier the girls used to wake up and go for their shifts. Now there is more emphasis on their own hygiene as well as maintenance of their rooms.
 - * Earlier, workers did not want to come for Nalam* meetings. Now they come running as soon as they hear there is a meeting planned.

Peer Educators also describe additional effects on themselves:

- Increased knowledge on health topics
- Pleasure in training other girls
- Increased ability to talk with confidence. One Peer Educator describes “I was extremely shy, now I cannot believe that I feel confident enough to stand in front of a large group and train them on these issues”, “Now, people listen when I say something!”.

* Nalam is the term used by workers and mill/ factory managers, referring to the WPGP of the TNMS programme. Nalam means *well-being* in Tamil.

Table 6 below, lists mid-term observations in mill/factory managers and compares these to objectives in ETI’s Outcome Map.

Table 6: Progress markers for measuring progress in mill/factory managers at mill/factory level¹⁵

Mill/ factory owners and managers		
	Objectives	Mid-term realization
Expected progress	1. Allowing WPGP to be conducted on their premises	1. All visited mill/factory managers report that currently, the TNMS programme is being implemented in their company. All visited mill/factory managers reported that they engaged their entire female workforce to participate in the WPGPs. In one unit, management was hopeful that trainings would be available for male workers too.
	2. Giving workers time to take part in WPGP	2. Peer educators and outers ¹⁶ participate in the programme during working hours, others participate during free time.
	3. Responding constructively to concerns raised via WPGP	3. All mill/ factory owners describe procedures meant to follow-up on issues raised through worker committees. For example, in one mill there are bi-monthly meetings of the grievance committee and monthly meetings with the canteen committee)
	4. Questioning recruitment practices of agents that bring workers	4. All mill/factory managers directly recruit new workers from communities rather than using recruitment agents, and using the reference of current workers to recruit new workers in villages near their homes.
Preferred progress	1. Welcoming WPGP and acknowledging the benefits it brings to their workforce and businesses.	1. All mill/factory managers acknowledge the value of the WPGP programme; some perceive the programme to benefit both workers and the business, others believe the programme to mainly benefit workers. See box I below.
	2. Improving working and accommodation conditions for workers in line with concerns raised	2. All visited mills/ factories report having procedures to follow-up on concerns raised. One manager explains: "There is an Internal Complaints Committee comprising of 5 people (3 workers, 1 staff and 1 lady advocate), which meets twice a month. If an issue comes up, it is registered and the Committee swings into action by verifying the circumstances and deciding on action. There is a grievance committee that meets twice a month. Complaints are forwarded to HR, so HR can monitor the follow up action - earlier <i>[before the WPGP]</i> this was not the case"
	3. Challenging bad recruitment practices and rewarding good recruitment practices	3. We found no evidence that mill/factory managers challenged bad recruitment. Manager describe that they recruit workers directly in villages (especially during festivals like Deepavali) or that they recruit by referral of current workers.

¹⁵ TNMS outcome map, updated version 24.03.15

¹⁶ Outers are day workers that do not stay in the company hostels.

	4. Supporting the establishment of other mechanisms -including trade unions- for workers to voice concern	4. All mill/factory managers report allowing <u>worker committees</u> to be established to help workers voice their concerns. One unit requested support from ETI to further strengthen its worker committees. All mill/ factory managers reported that they would allow <u>trade unions</u> access to their company and workers, although none of them were in actual contact with trade unions. The manager of unit 3 stated that joining a union would be good for the workers.
	5. Establishing good recruitment and employment policies implemented by good HR systems	5. All mill/factory managers report having policies addressing working conditions in place, including mechanisms for workers to raise their voice (committees, grievance mechanism). Policies currently in place in the units, are: (i) health & safety, (ii) wages & payment, (iii) leave, (iv) recruitment, (v) working hours and overtime (vi) grievance mechanism
	6. Improving working conditions in line the Base Code	6. In unit 3, management has requested support from ETI to update and strengthen its recruitment and employment policies. In other units, this was not mentioned.
Ideal progress	1. Seeking workers views on improving workplace and accommodation conditions	1. In visited units, managers use workplace committees to seek workers' views. In all visited units, these committees are in place and functioning. In addition, managers acknowledge the value of listening to workers' views. The manager of unit 1 stated that "what is good for the workers, is good for us". The manager of unit 5 said that issues raised through the grievances committee are directly routed to the HR-department.
	2 & 3. Engaging with industry level, regional and national processes to improve recruitment/ employment practices. Collaborating with other mills/factories to raise standards in employment and recruitment practices in Tamil Nadu	2 & 3. Mill/ factory managers report that they are not engaging or collaborating directly with other companies or other players in the industry. Sharing is mainly done via associations. We did not find evidence that managers were actively seeking to improve recruitment policies or practices.

Mill/ factory managers contribute changes in worker's health, reduced cost of absenteeism and medical care, lower food waste, increased knowledge in workers about their health and diet, improved cleanliness of the hostel and workplace to the TNMS programme. Managers' perception of TNMS contribution to their business is summarized in Box 2 (WPGP business case) below.

Box 2. The WPGP business case

Reported benefits of WPGP by mill/factory managers:

- Reduced absenteeism (8 to 10%) because of improved health of workers
- Reduced cost of medical bills (from approx. Rs. 25,000 to Rs. 3000 / Rs. 4000 per fortnight)
- Less food waste: due to improved knowledge on healthy diet and nutritional value, workers eat their vegetables instead of leaving them untouched
- Change in knowledge/ attitude of workers
- Improved cleanliness of hostel and workplace
- Improved confidence in workers: they are better able to solve their issues
- Improved ability of workers to work as a team
- It is an opportunity for women to educate themselves and others, a valuable addition to their life.

3.2.4 Analysis of the contribution by ETI

We find that the changes in women workers and in mill/factory managers can be attributed to the TNMS programme, because:

- in visited mills/factories there were no other initiatives being implemented
- all interviewed women workers and mill/ factory managers are convinced that changes in health, well-being, quality of food, increased knowledge of health and healthy diet, is due to the Nalam programme (Nalam programme refers to the WPGP). Workers were also aware that the recent raise in wage was not due to the programme, but due to government legislation.

3.2.5 Summary of progress at mill/ factory level

Both women workers and mill/ factory managers reported results in line with the expected progress markers. Women workers also reported results in line with the preferred progress markers, while reported results from mill/factory management were less consistent with preferred progress markers.

Implementation of the WPGP is taking longer than expected. Critics question the ability of the programme to address issues related to worker rights, as follow-up of the health approach. More about this in section 3.5.

3.3 Progress at community level

The objective of the community outreach programme is “to eliminate exploitative practices in the textile and garment industries by enabling current, potential and former women workers of textile and garment industries in selected ‘sender’ or ‘recruitment’ communities, irrespective of caste and religion, to help themselves through education on workers’ rights”¹⁷.

Target groups of the community outreach programme are: workers (current, former, future), female students and their teachers, parents, local leaders, recruitment agents. The community outreach programme is implemented in eight districts in Tamil Nadu by eight different local NGO-partners (see table below). The community outreach programme does not cover regions outside Tamil Nadu. Not all NGOs reached all target community groups. The table below mentions those community groups that were not reached in a district.

Table 7: Overview of NGO-partners, their working districts and non-targeted community groups

NGO-partner	District (all Tamil Nadu)	Community groups that were not reached
Indian Development Organization Trust (Indo Trust)	Ariyalur	
Karipatty Rural Organization for People’s Education (K-ROPE)	Salem	Students and teachers
Nathan Education Trust (NET)	Villupuram	Recruitment agents Students and teachers
Rural Education and Development Foundation (READ Foundation)	Cuddalore	
Vaan Muhil Trust	Tirunelveli	
Social Awareness and Voluntary Education (SAVE)	Krishnagiri	

¹⁷ Copied from ‘TNMS 1st year community outreach programme reporting format’.

Development Education and Environment Protection Society (DEEPS)	Dharmapuri	Students and teachers Government representatives
National Mother and Child welfare Organization (NAMCO)	Thiruvapur	

As listed above, not all target groups were reached by the NGOs. In DEEPS case, students/ teachers as well as government representatives were targeted by the outreach programme. However, the process for connecting with these groups was found to be too cumbersome as it required permissions from departments at higher levels, and permission was not granted. READ Foundation managed to connect to a limited number of teachers and used them to reach other teachers in other schools. This approach did not require high-level permissions. DEEPS did reach out to government representatives, but received no positive response from them. Recently, newly transferred representatives came into the district, who seem to be more inclined to participate in DEEPS programme in the second year.

In this chapter, we describe progress of the community outreach programme in terms of (i) reported reach and influencing target community groups, and (ii) successes achieved and challenges encountered during implementation.

3.3.1 Progress of the community outreach programme: reaching and influencing community members

Table 8 provides an overview of the number of community members (parents, workers, students and the general public) involved by in the community outreach programmes.

Table 8. Cumulative reach of community members in eight targeted districts, from December 2014 to March 2016¹⁸.

March 2010

Quantitative objectives ¹⁹	Activities		Men	Women	Total
To increase awareness of relevant employment law, workplace conditions and rights among 40,000 young women and girls in 6-8 districts from which young workers are recruited.	Workers rights education and sensitization programmes for <u>parents and women</u>		3,975	33,600	39,757
	Workers rights education and sensitization programmes for <u>current, past, potential and current workers</u>		2,684	12,024	14,708
	Workers rights education and sensitization events for the <u>general population</u>		7,882	19,737	27,619
	Workers rights education and sensitization programmes for <u>school students</u>		4666	5,086	9,752
	Supporting workers	Identified	29	558	587
		Supported	9	3	12
	Others		22,828	50,292	73,120
	Total community members reached		42,065	121,300	163,365
Recruitment agents					

¹⁸ Calculations made based on data from TNMS Quarterly report – Quarter 1 2016, and TNMS Quarterly report – Quarter 4 2015.

¹⁹ TNMS Logframe – December 2014.

To improve the legality and transparency of recruitment practices at factory/mill and community level in order to reduce child labour and the exploitation of workers ²⁰ .	Worker rights education and sensitization interaction with <u>recruitment agents</u>	199	109	308
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All eight partner NGOs in all eight districts reported increased awareness and knowledge about labour laws and worker rights²¹. The number of people reporting increased knowledge on worker rights and labour laws, per target group, per region is as follows (see table below).

Table 9. Number of people (per target group) reporting increased knowledge of worker rights and labour laws.

about laws.

NGO-partner	Young women		Parents		Recruitment agents
DEEPS	Women/ girls Pretest: 72% Posttest: 93%	Men/ boys Pretest: 76% Posttest: 85%	Women/ girls Pretest: 72% Posttest: 93%	Men/ boys Pretest: 76% Posttest: 85%	Less than 25%
K-ROPE	1230		2471		3
READ Foundation	2413		1006		38
NET	1296		525		-
Indo TRUST	1868 (out of 1962)				72
Vaan Muhil	117		239		-
NAMCO	-		-		-
SAVE	107		213		12

To explore changes in knowledge and awareness of community members in more detail, we visited the three main sourcing communities for TNMS participating mills and factories (Cuddalore, Dharmapuri and Salem). We focused on parents & women, female students & their teachers, and recruitment agents and compared results for these groups towards TNMS Outcome Map Progress Markers, for the community outreach programme.

3.3.2 Progress of the community outreach programme in three selected regions

Table 10 below, provides an overview of progress of the community outreach work in three selected regions, for three target groups, compared to the progress markers described in the TNMS Outcome Map.

²⁰ The TNMS logframe does not provide a quantitative objective for recruiters/ recruitment practices.

²¹ Annual community outreach programme reports of all partner NGOs (DEEPS, K-ROPE, READ Foundation, NET, NAMCO, SAVE, Vaan Muhil, Indo Trust).

Table 10: Progress markers sending communities and recruitment agents in Cuddalore, Dharmapuri and Salem.

Sending communities		
	Objectives	Mid-term realization
Expected progress	1. Taking part in awareness raising sessions	1. Since December 2014, 163,365 community members were reached by community outreach programmes (for specifications, see table 6 above) ²²
	2. Improved knowledge and understanding of labour rights and conditions in mills and factories	<p>2. All eight partner NGOs in all eight districts reported awareness and knowledge about labour laws and worker rights (for specification per NGO, see table 6 above).</p> <p>Female students received training on a 6-point labour right guideline (see section below). Teachers signaled that students are tempted to join mills by current workers returning home during leave, often showing signs of wealth (new clothes, smartphone, cash in hand).</p> <p>Community members: some community members reported that they knew which mills/ factories are known for bad employment record (e.g. delayed or withheld payments) and which mills/ factories pay good wages and what deductions are withheld from workers' wages. Other parents reported knowing about bad working conditions for women workers, but also that they felt that they did not have a choice but to send their daughters to work to mills because they needed money. Some community members reported to be happy with the working conditions in mills for workers, even though they know that workers would not get paid double overtime rates and they know of workers that are having problems to collect their PF dues after they finished working in the mills/factories. Also, community members reported that they think wages of Rs. 140 per day are not bad for young beginning workers.</p>
	3. Being aware of what child labour is and why it is unacceptable	<p>3. Cuddalore's students are taught that young people under 18 should finish their school instead of going to work. Some community members stated that they needed money to support their families, and that they do not always felt they had a choice about sending under aged girls to work.</p> <p>Community members in all three visited districts were clear that no child below the age of 15 should be working, either in mills or in other sectors.</p>
	4. Questioning poor recruitment practices	4. Community members reported that they had no alternative but to accept employment terms of mills, because they cannot afford not to work or to lose their job.

²² TNMS Quarterly report – Quarter 1 2016, and TNMS Quarterly report – Quarter 4 2015.

Preferred progress:	1. Demonstrating good knowledge of labour rights and conditions in mills and factories	1. Female students have used their training on the 6-point labour right guidelines, to share their knowledge with their friends and relatives. Parents reported that they know which mills/ factories are known for bad employment record (e.g. delayed payments/ withholding payments), which mills/factories pay good wages and what deductions are withheld from workers' wages.
	2. Using relevant services to get advice on recruitment, health, remediation etc.	2. Former workers have difficulties in getting paid their PF dues. Because mills/factories don't provide contracts, people have no proof that they worked in a certain mill.
	3. Refusing to agree to employment without accurate information and a sound contract	3. Communities reported not having alternative options but to agree to employment under bad conditions. They need the money to provide basic needs for the family.
	4. Refusing to allow under-aged girls (or boys) to be recruited	4. Some community members stated that they needed money to support their families, and that they do not always feel as they have a choice about sending under aged girls to work.
	5. Reported illegal recruitment and employment practices to the authorities	5. Communities in Salem reported that they have no alternative but to accept bad working and employment conditions. They are afraid that, if they ask questions, or make reports about bad practices, they will lose their jobs and income.
Ideal progress	1. Raising other communities' awareness on labour rights and factory/ mill working conditions	1. No evidence found
	2. Directly challenging recruitment agents, mills and factories who do not respect labour rights and demanding remediation	2. Visited communities did not feel empowered to address issues with mill/factory management, because they feel poverty leaves them with no alternative then to work under bad conditions for low wages.
	3. Lobbying government for improved labour laws	3. No evidence found.
Recruitment agents		
	Objectives	Mid-term realization
Expected progress	1. Participating in training sessions	1. 308 recruitment agents participated in training sessions from local NGO partners ²³
	2. Demonstrating increased knowledge and understanding of labour laws and rights	2. Interviewed recruiters showed some knowledge of labour laws/ rights (focus only on 3 meals a day, daily payment of Rs 120 to Rs200). No mention of working hours, paid overtime, use of PPE, leave arrangements. No PF, no ESI.
	3. Demonstrating increased knowledge of and beginning to follow good recruitment practices	3. Especially in Salem and Dharmapuri, recruiters said that they are not in a position to address issues in mills, nor to change their practices. If they do, they fear they will lose their jobs.
Preferred	1. Giving potential workers correct information about prospective jobs	1. All recruiters felt they were honest to new recruits about what they get if they go to work in mills: 3 meals a day, a place to stay and paid work for 26 days a month.

²³ TNMS Quarterly report – Quarter 1 2016, and TNMS Quarterly report – Quarter 4 2015.

	2. Providing legally sound contracts that respect workers' rights and comply with labour laws	2. No contract provided by mill, agreements are made verbally
	3. Engaging with trade unions to ensure that their practices are fair	3. One recruiter mentioned trade unions; he recalls the worker strikes of the 70s, led by trade unions. He thinks that is why mills/factories are now trying to recruit women workers: they are more easy to deal with, less likely to stand up, and temporary workers since they will get married when they reach 18.
Ideal progress	1. Encouraging fellow agents to improve their practices	1. no evidence found
	2. Participating in industry, regional and national level processed to raise the quality of recruitment practices	2. no evidence found

All NGO partners reported increased knowledge and awareness of labour laws for both community members and recruitment agents. Some NGOs also reported that they observed changes in behaviour in community members: school dropout rates were lowered and the number of parents sending girls to work in mills has reduced. Communities, as well as recruiters, confirmed this. There is lower incidence of young girls from their village going for millwork compared to earlier years.

During our interaction with community members, parents of current workers also presented another point of view. These parents felt that they did not have a real alternative for sending their daughters to work in mills, because they need the money from millwork. Likewise, interviewed recruitment agents did not report to have changed their behavior towards more ethical recruitment. An explanation for this might be that recruiters do not feel to be in the position to address working conditions and workers' rights with employers.

3.3.3 Successes and challenges during implementing of the community outreach programme

The NGO-partners reported on the following successes achieved and challenges encountered.

Successes

- *Collective use of training materials.* All NGO-partners have used the same training materials for awareness raising sessions and community member trainings. NGO-partner VAAN Muhil Trust have developed this training, using pictures to address 6 key elements: (i) Minimum wage, (ii) 8 hour working day, (iii) Leave once a week, (iv) Double wage for overtime, (v) PF & ESI benefits and (vi) Use of Personal Protective Equipment and medical care in case of workplace accidents, all provided by the employer.
- *Reaching, raising awareness and increasing knowledge in community members.* All NGO-partners reported to be successful in reaching communities and to be able raise awareness and increase knowledge of labour laws and workers' rights. One NGO-representative said: "Workers are amazed that they are entitled to rights. This was the first time someone spoke with them about rights!"
- *Identification of workers.* All NGO-partners reported to have been able to identify workers in need of legal support. Some also reported to have assisted workers to documenting their case and to retrieve money from (former) employers. For example, NGO-partner READ Foundation reports to have retrieved Rs. 650,000 from PF-dues, outstanding wages and compensation for work related injuries.
- *Identification and connecting with local recruitment agents.* Most NGO-partners reported to have been able to identify and connect with local recruitment agents. NGO-partner NET did not target recruitment agents in their programme.
- *Reduced school drop-out rate among female students.* NGO-partner READ Foundation reported to have seen reduced drop-out rates in school girls.

- *Reduced number of parents sending their daughters to work in mills.* NGO-partners DEEPS reported to have seen a reduction of number of parents that send their daughters to work in mills.
- *Create space by repeating messages.* NGO-partner Indo Trust reported to get very limited support for their work in the early phase of the outreach programmes. Communities justified that sending their girls to work in mills was correct and needed to support livelihoods. Only after continuous messaging communities were able to open up to messages about workers' rights and labour laws.

Challenges

- *Recruiters are not ready to commit.* Some NGO-partners signaled that recruiters were not ready to commit to adopting more ethical recruitment practices. For example, NGO-partner K-ROPE mentioned that one of the recruiters that participated in the programme, warned mill owners not to give workers documentation of their employment.
- *Hostile environment.* NGO-partner READ Foundation mentioned that its workers were being threatened because they reached out to recruitment agents.
- *Documenting employment.* NGO-partners signaled that it is difficult to support workers to claim outstanding wages or claim their PF-dues, because workers cannot prove that they were employed in a certain mill/factory. According to NGO-partner READ Foundation, mills may give wrong initials, or change the name of employees subtly, when registering a worker for PF. So, when workers seek PF-payments, there is no record of such a person in PF books. The legal support team has learnt the tactic of writing to the mills, making a claim for a far larger amount from a longer working period, which makes some mills respond that the employee worked only for a shorter period and that they had settled all claims. READ Foundation uses this as proof of employment, then work with legal services to follow up for PF. Another example comes from NGO-partner K-ROPE. K-ROPE is trying to convince workers to keep copies of whatever documents they can get (even time sheets showing attendance for a specific month. However, recruiters have been warning employers not to give the girls anything that can link them to their place of work, so timesheets are no longer handed over to girls.
- *Problems accessing communities.* NGO-partners (mainly in rural areas like Salem and Cuddalore) report that access to remote rural communities in target districts is challenging. Further, access may be limited due to bad condition of infrastructure and due to bad weather conditions (floods and heavy rains in the district).
- *Language.* In some districts, there are multiple languages spoken. For example, NGO-partner SAVE reported that in the Krishnagiri district, people speak at least three languages: Tamil, Telugu, Kannada and specific tribal languages. This was being dealt with by appointed staff members that spoke these languages, or by hiring an interpreter.
- *Low literacy levels in community members.* In some poor, rural areas literacy levels in communities is low. This has been dealt with by using pictures during trainings instead of written materials.

3.3.4 Analysis of the contribution by ETI

We conclude that the community outreach programme most likely contributed to increased awareness and increased knowledge about worker rights and labour laws, in community members and recruitment agents. This conclusion is supported by consistency in NGO-partner annual reports, combined with pre- and posttest measurements that were available for some of these reports.

Next, we conclude that the programme's contribution to behaviour change in community members and recruitment agents is less likely. Even though one NGO reported behaviour changes in parents (e.g. not sending underage girls to work), most others did not report concrete changes in this regard. Moreover, there is consistency among community members from mainly the rural districts Salem and Cuddalore, that there is no real behaviour alternative available to help members to claim the rights.

Determine ETI's contribution of the observed and reported effects of the community outreach programme is difficult, because

- *There are other service providers in the region, addressing workers' rights, but it is unclear how many there are, what they do and what their impact is.* There are several locally operating service providers (e.g. block-level NGOs, trade union, CSOs) in Tamil Nadu, that are also addressing and advocating (aspects of) workers' rights and are working on empowerment of community members. All NGO-partners have performed a mapping exercise to identify locally operating service providers in their districts. Reports of the NGO-partners were not consistent on this:
 - NGO-partner DEEPS reported to have identified 15 locally operating organizations
 - NGO-partner VAAN Muhil Trust reported on the number of poor families that they identified
 - NGO-partner READ Foundation mentioned that it needed additional guidance to be able to provide ETI with the necessary information.
- *Monitoring data from the community outreach programme is not always comparable.* This makes it difficult to draw conclusions on the programme's effect and on ETI's contribution to this effect. For example, NGO DEEPS reported percentages without reference to the size of the group (table 9). NGO NAMCO did not report any number of people reporting knowledge (table 9). It is not clear if this is because they did not implement any activities to achieve this, if they did not collect the data or if they misunderstood the question on the monitoring format.

3.3.5 Summary of progress of the community outreach programme

The community outreach programme is implemented in eight districts within Tamil Nadu, by eight NGO-partners. So far, the programme has reached 163,365 community members, of which 121,300 female community members. In addition, 11,485 community members (females and parents) reported on increased knowledge of labour laws and worker rights.

Most NGO-partners targeted recruitment agents with the community outreach programme. Results for recruiters are mixed: some NGO-partners signal that recruiters are not yet ready to commit to ethical practices, while other NGO-partners report that targeted recruiters are willing to commit to more ethical practices.

It is difficult to compare results between regions and NGO-partners, because NGO-partners were free to determine their own plan of action and approach toward community outreach. Also, it is difficult to determine the contribution of observed effects by ETI's TNMS programme. This is mainly because there are multiple locally operating initiatives that are also working to raise community awareness on workers' rights. Sometimes local initiatives are mapped by NGO-partners, and sometimes they are not mapped. Even when other local initiatives are mapped, it is not clear what activities they perform and how these interact with TNMS programme implementation.

3.4 Progress of policy reform

3.4.1 Reaching legislators and government agents

The tables below provide an overview of the number of legislators and government agents, reached by the sensitization programme of NGO-partners. Table 11 provides a general overview; table 12 presents reach per NGO-partner.

Table 11. Cumulative reach of government representatives in eight targeted districts, from December 2014 to March 2016²⁴.

Objectives ²⁵	Activities	Men	Women	Total
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²⁴ Calculations made based on data from TNMS Quarterly report – Quarter 1 2016, and TNMS Quarterly report – Quarter 4 2015.

²⁵ TNMS Logframe – December 2014.

To contribute towards the reduction of the legal limit of apprenticeships in Tamil Nadu from 3 years to 6 months	Sensitization/ interaction with local body elected members	537	535	1,072
	Sensitization/ interaction with government officials	447	339	786
Total		984	874	1,858

Table 12. Number of local body elected members and government officials reached by sensitization/ interactions of the local partner-NGOs, December 2014- November 2015²⁶.

NGO-partner	Local body elected members/ leaders	Government officials
DEEPS	104	17
K-ROPE	17	358
READ Foundation	226	214
NET	0	0
Indo TRUST	95	62
Vaan Muhil	58	9
NAMCO	312	48
SAVE	38	14
Total	850	722

From the tables above we see that there is considerable difference in reach of legislators and government agents, by the NGO-partners. NET did not target this group. K-ROPE reached the highest number of government officials and NAMCO the highest number of local elected government members.

3.4.2 Progress of the policy reform efforts

Table 13 below, provides an overview of progress of the policy reform efforts, compared to the progress markers described in the TNMS Outcome Map.

Table 13: Progress markers for policy reform for legislators and government agents

Legislators/ government agents		
Expected progress	1. Agreeing to meet with ETI and partners to discuss the laws limiting the length of apprenticeships	1. Five NGO-partners report to (easily) reach local body elected members. Read Foundation and K-ROPE used their connection with local elected members to reach/assemble community members for participation in the outreach programmes. Indo Trust reported to have experienced lot of support from local panchayats. Also Vaan Muhil report a lot of support, including facilitation of passing a resolution against fraudulent recruitment practices of young girls for spinning mills. NGO-partner DEEPS reported that they supported local government representatives (panchayat member and panchayat president) in developing a Migration Register. The Migration Register keeps track of young women workers who migrate to work in out-of-states mills and factories.

²⁶ Annual reports (TNMS: 1st year community outreach programme reporting format) of all eight NGO-partners.

Preferred	1. Putting pressure on central government to pass the law on reducing the length apprenticeship in Tamil Nadu	1. No evidence.
Ideal progress	1. Change the law so that the apprenticeships in textile mills and garment factories cannot be extended beyond 6 months or 1 year.	1. In June 2016, an amendment to the Industrial Employment Standing Order Act was passed, ensuring that working conditions of workers (including apprentices, trainees and temporary employees) are included in the standard model standing order ²⁷ .

Reported progress of the policy reform effort, as reported by NGO-partners, is in line with expected progress markers as described in the ETI TNMS Outcome Map. Reports from NGO-partners in the different districts show mixed approaches. While some NGO-partners had difficulty in accessing government representatives, others reported that legislators were eager to receive them and to work with them. One NGO-partner (NET) did not work with government representatives nor agents. In June 2016, an amendment to the Industrial Employment Standing Order Act was passed, ensuring that working conditions of trainees, temporary workers and apprentices are included in the standard model standing order. This amendment allows states more possibilities to frame and modify employment conditions within the state. This allows stakeholders to be part of the reform process and influence/ enable the change process, for example towards a shorter time for apprenticeships. Thus, the amendment creates an opportunity for the lobby and advocacy work and is a big step towards better protection of vulnerable young women workers in Tamil Nadu.

3.4.3 Successes and challenges during policy reform effort

The NGO-partners reported on the following successes achieved and challenges encountered during their policy reform efforts.

Successes

- *Work together with local governments to reach community members.* Several NGO-partners reported to have used their connection with local governments to reach other community members to participate in sensitization programmes. For example, NGO-partner Indo Trust mentioned that panchayat leaders would inform the NGO about special meetings in villages. This enabled Indo Trust to attend such meetings and address workers' rights.
- *Create space.* Community members initially resisted messages about workers' rights and labour laws. NGO-partner Indo Trust reported that only after continuous repetition of the messages people started to listen and finally supported implementation. Similarly, K-ROPE reported that leaders of Panchayat Raj Institutions would not allow programmes. Only after assuring that K-ROPE intended to only spread a message and was not aiming to initiate protests, the programme was allowed in.
- *Facilitation to pass the resolution on fraudulent recruitment practices.* NGO-partner Vaan Muhil Trust reported that local government representatives agreed to facilitate passing of a new resolution against fraudulent recruitment practices.

Challenges:

- *Lack of support from local government representatives.* Some NGOs report having difficulties in reaching local government representatives or to get them to support the programme. For example, NGO-partner K-ROPE mentioned that 10 panchayat leaders refused to address the issues of minimum wages with mill owners, because they employed workers below minimum wages themselves.

²⁷ Government of Tamil Nadu (2016). Part IV – Section 2, Tamil Nadu Acts and Ordinances. Tamil Nadu Government Gazette.

- *Lack of government ability to create alternative livelihood options.* Several NGO-partners (e.g. Vaan Muhil Trust, DEEPS) signaled that governments lack the ability to create alternative livelihood options for millwork in Tamil Nadu. Poor families send their girls to work in mills in Tamil Nadu because there are no employment opportunities nearby.
- *Lack of political will.* Vaan Muhil Trust reported to encounter lack of political will to change the situation with regard to Tamil Nadu industry and working conditions.
- *Results are expected to be visible only after longer period of time.* Result of awareness building activities can take a long time to become visible. This can be dealt with by making long-term agreements between NGO-partners and ETI.

3.4.4 Analysis of the contribution by ETI

The results of policy reform efforts by NGO-partners are limited: connections with local government representatives were mostly used to gaining access to community members, and not (or less) to establish a political lobby towards reducing length of apprenticeships.

Contribution of ETI to the recent amendment of the Industrial Employment Standing Order Act is difficult to be determined, because there are multiple parties lobbying and advocating change. In addition, there is not a clear path of ETI's activities that can be linked to passing of the act.

3.4.5 Summary of the policy reform effort

Reported progress of the policy reform effort, as reported by NGO-partners, is in line with expected progress markers as described in the ETI TNMS Outcome Map. NGO-partners reached 1,858 government representatives with sensitization programmes or interactions. Not all NGO-partners reached government representatives: NET did not target this group; DEEPS reported to have reached a limited number due to difficulty in gaining access.

We did not find any evidence that local/ regional government representatives put pressure on national governments to pass the law on reduction of length of apprenticeships in Tamil Nadu. NGO-partner Vaan Muhil Trust reported that government representatives agreed to facilitate passing a law against fraudulent recruitment practices. It is unknown if this law has passed and what the role of Vaan Muhil has been. So, it remains unclear if local government representatives and agents are capable to influence the law or to influence national governments to change the law.

3.5 Insights from stakeholder interviews

During the evaluation, we conducted 30 Key Informant Interviews with 32 key informants. A complete list of key informants is provided in Annex II.

In the table below, we provide an overview of insights from stakeholder interviews. We organized these insights in two sections: stakeholder *praise* and stakeholder *concerns*.

Table 14. Overview of stakeholder praise and concerns per programme element.

	Praise	Concerns
Worker Peer Group Programme		
	1. Gaining access to spinning mills and women workers	1. Slow pace and delay
	2. Creating a positive impact for women workers	2. WPGP does not have a rights perspective
	3. Strong local representation	3. Consider other approaches for accessing mills, next to the Trojan Horse approach

	4. Created an environment of trust in a very hostile and low-trust environment	4. Do not only focus on trainings, but also on concrete improvements in workplaces
Community outreach programme		
		5. Inadequate use of existing local structures
		6. Impact is limited because community do not feel empowered to actually claim their rights
Policy reform efforts		
		7. Poor monitoring and enforcement of laws, both nationally and regionally level
		8. Stronger focus on higher governmental levels is needed
Programme as a whole		
	5. ETI delivered proof of concept	9. Weak communication
		10. Ineffective use of multi stakeholder environment
		11. Organize stronger leverage from brands
		12. Unclear role definitions and expectations among stakeholders
		13. Lack of potential for scaling-up

Below, we address these praises and concerns one-by-one.

3.5.1 Praise from stakeholders

1. *Gaining access to spinning mills and women workers*

Most stakeholders recognized ETI and valued the TNMS programme for being able to gain access into spinning mills and garment factories. Especially spinning mills are known to be inaccessible for NGOs, trade unions and even for buying brands. In this context, ETI is praised to have developed a concept with which they proved to be able to access mills and were capable to work with mill/factory management and with women workers directly.

A stakeholder from a trade unions said: “in a scenario where trade unions do not have access to the mill, ETI’s training is a welcome step in the right direction”.

2. *Creating a positive impact for women workers*

Almost all stakeholders expressed their appreciation for ETI’s TNMS programme because of the positive impacts of the WPGP on women workers in mills and factories.

3. *Strong local representation*

Stakeholders mentioned that the TNMS programme started to deliver results, after a strong local team was appointed locally, to work with mill and factories directly. Characteristics of the local team members that enabled the programme to progress are (i) open mindedness, (ii) non-threatening way of communication and (iii) very persuasive. Further, the local team is valued for its ability to relate both to mill/ factory managers and to workers.

4. *Created an environment of trust in a very hostile and low-trust environment*

Stakeholders (from both ETI, trade unions and NGOs) signaled that there is a basic mistrust in the sector, mainly regarding NGOs and trade unions. ETI, being an initiative from trade and brands, appears to have

a better position in the sector (compared to NGOs or trade unions) to address issues and gain access to workplaces. An ETI stakeholder said: “we used leverage from brands to gain access to mills”.

One stakeholder ETI said: “The TNMS programme is a huge achievement! In the 2012 workshop, there was a lot of mistrust, people were running out of the room, almost like a Monty Python show. Now, no one is running away. It has been bloody hard work”.

5. ETI delivered proof of concept

Multiple stakeholders mention that the TNMS-programme proved to be unique in gaining access to workplaces and to actually implement a programme for women workers in the workplace. These stakeholders value the TNMS programme for being practically the only programme that has actually delivered results.

3.5.2 Stakeholder concerns

1. Slow pace and delays

Stakeholders are almost unanimous by stating that the programme has been slow to produce results. Brands, independent NGOs as well as ETI-staff and TNMS advisory group members, all stress the need to pick up speed, to move from phase I to phase II quicker and to deliver results quicker. Some quotes from key informants:

- In the beginning in 2012, the project has not been running well. It was too slow in showing progress. The budget was underspent; instead of 15 mills we only reached 2 with half a project
- It's a programme with a long-term horizon: sector transformation requires up to 10 years! In year 0 to 2 we build confidence and provide proof of concept.
- It [the TNMS-programme] is way too slow! Move on to phase II quicker: we are not in this to address food and nutrition, we want to clear up our supply chain and resolve issues with our suppliers
- Move to phase II quicker! It is not about health. We want to work on improving rights and responsibilities!

Stakeholders provided various explanations for delay in delivering results:

- The local TNMS team was only hired in mid-2013. Conversations about the programme with stakeholders have been ongoing since 2011.
- Initially, there was an enormous amount of stakeholders involved, this caused discussions to take a very long time.
- Mismatch in expectations, role and responsibilities: some local operating NGOs felt that they ‘owned’ the topic, while ETI wanted to be responsible for delivery.
- There was a lot of mistrust between stakeholders: mills/factory managers were not prepared to work together with NGO's/ trade unions. They did not even want to be in the same room with them. In line with this, another informant added “in the beginning, the level of trust among stakeholders was not zero, but minus 100.
- Nomination of mills took a lot of time: unlike factories, mills are not on the visible end of the supply chain (garment factories are). So, there is not enough pressure from brands to get them to clean up their act.

2. WPGP does not have a rights-based perspective

Stakeholders with a trade union perspective, signaled that the programme is not designed from a rights-based perspective. Brands too, have stated that they are not participating in the programme to improve health but to address issues regarding worker rights in their supply chain.

Critics mentioned that:

- There is no clear path, nor timeline, through which phase I leads to phase II
- When you look at it from a rights-based perspective you ask different questions
- The programme does nothing for these women to actually help them claim their rights

- When you look at the new curriculum, rights are only partly addressed and mainly from a business perspective.

3. *Consider other approaches, next to the Trojan Horse approach*²⁸

Most stakeholders valued the Trojan Horse approach and are not familiar with alternative approaches to accessing mills and working with workers. However, there were three stakeholders (one from a brand, one from a trade union, one from ETI) who were familiar with other initiatives that also proved to be successful in accessing workplace without a Trojan Horse approach. These stakeholders mentioned that there are mills that allow unions inside their workplace and to actually interact with workers. These stakeholders challenged the assumption that the Trojan Horse approach is the only way to gain access to mills and workers.

4. *Do not only focus on training, but also on concrete improvements in workplaces*

From brands comes the critique that the programme should not focus mainly on education and training, but also on making concrete improvements for workers. For example, one brand representative mentioned that the company's social audit revealed that workers felt isolated and were unable to contact relatives and friends back home. The brand initiated a project in which all workers got mobile phone.

5. *Inadequate use of existing local structures*

Some stakeholders mentioned that the programme failed to adequately map existing local structures before it started its community outreach programme and, as an effect, failed to effectively tap into existing local knowledge and expertise. One stakeholder said: "there was no need for a new initiative in the region! There are a lot of existing local structures. ETI failed to research their capacities and operated as a stand-alone entity".

6. *Impact is limited because communities do not feel empowered to claim their rights*

Several stakeholders, especially locally operation NGOs/ CSOs, expressed their frustration that communities might not be able to claim their rights, even after they have reported increased knowledge and awareness of workers' rights and labour laws. Communities seem to feel disempowered to address these issues because they need money from the work in mills, and are fearful to address the issues with recruiters or employers.

7. *Poor monitoring and enforcement of laws, at both national and regional levels*

Some stakeholders signaled that even when laws and legislation are changed in favour of workers, it is not certain that the situation regarding recruitment and working conditions will improve. One stakeholder mentioned that capacity for monitoring and enforcement of laws is very limited in Tamil Nadu.

8. *Stronger focus on higher governmental levels is needed*

The *Amsterdam Coalition* is a new initiative of brands and NGOs, focusing on improving workers' rights from a business perspective. The Amsterdam Coalition focuses on influencing and lobbying of national governments for changing laws. The Amsterdam Coalition is still in its inception phase and is expected to publish its first plans and reports, in the next months.

The Amsterdam Coalition is borne out of frustration with the slow pace of the TNMS programme to deliver results and about the small scale the programme is producing results. Also, there were doubts of the ability of the TNMS to be able to produce results at a larger scale.

9. *Weak communication*

Multiple stakeholders signaled that communication from ETI towards stakeholder could be better. Elements that are highlighted are:

²⁸ ETI's approach of first addressing health related issues, followed by rights related issues, is sometimes referred to as a *Trojan Horse approach*: the first phase (health) is used to build confidence and trust to lay the foundation for addressing rights.

- Do not communicate with all stakeholders the same way, but find ways to communicate with them in ways to match their roles and responsibilities in the programme. Currently, communication about programme progress is being sent in the form of Quarterly Updates. Some insights from stakeholders:
 - Brands appear to require more focused and structured updates, with easy-to-digest and preferably actionable items. One stakeholder said: “I simply do not have the time to go over all those pages. It almost seems an academic read to me.
 - TNMS advisory group members require more in-depth updates that informs their advice and enable them to play the role of critical friend.
- Lack of meaningful face-to-face interaction between stakeholders. Meetings are classified as being dull, infrequent, not interactive and often too short. Also, it is difficult to gather all relevant international stakeholders.
- It is unclear how decisions are made. Stakeholders feel that their input is being ignored.
- Not all stakeholders know how they can share best practices, relevant information or projects with the TNMS-group. The platforms for sharing and learning are not known to all stakeholders.

10. Ineffective use of multi stakeholder environment

Several stakeholders highlight the point that ETI has not made the most effective use of the multi stakeholder environment they have created:

- Trade union representatives said that they do not feel that they are considered as an important partner. To quote one of these stakeholders: “some stakeholders are more equal than others”. Another stakeholder with a trade union perspectives signals that they would like to be involved in the next phase of the project, but do not know how to achieve this.
- Stakeholders from local operating NGOs signaled that ETI has made inefficient use of local existing structures for the community outreach programme and that ETI has failed to tap into their expertise on local networks and the situation on the ground.
- Several stakeholders stated that ETI should use their connection with brands more effectively, by organizing combined leverage from brands.

11. Organize leverage from brands

Several stakeholders mentioned that ETI’s strength lies in connecting and working with brands. Impacts for women workers may be stronger when ETI focuses on organizing combined leverage from brands to create a greater urgency for change in the textiles sector.

12. Unclear definition of roles within the programme and differences in expectations among stakeholders

Multiple stakeholders mentioned that they are confused about their role in the programme, that they do not know what is expected of them and that they have experienced disappointments in the way that ETI has responded to their inputs and feedback. Some examples:

- Members of the TNMS advisory committee signaled that the advisory committee gets informed about decisions, instead of being involved in the decision-making. In addition, members of the advisory committee feel they do not always have access to relevant information that is required to fulfill their advisory role.
- Members of the Local Consultative Committee feel that their input is not used and they feel they cannot fulfill their consulting role.
- Trade union representatives seek to gain access to the programme team, but receive no clear answer on requests about if, how and when to join.

13. Lack of potential for scaling-up

Some stakeholders have questioned the ability of the TNMS programme for upscaling. They mention that the programme proved to be very time consuming. Therefore, they think it is not plausible to assume that the programme can achieve reaching a lot more workplaces.

Currently, ETI is working to solve (parts of) this problem by hiring additional local staff members (one labour rights specialist and one health specialist). This is expected to result in more in-house knowledge on topics of labour rights and health, and will enable current staff members to spend more time on stakeholder engagement and communication.

Picture 3. Focus Group Discussion with female students.



4. Conclusions and recommendations

4.1 Conclusions

4.1.1 Effectiveness and impact

We conclude that the TNMS programme is partly on track to deliver its 2017 objectives related to effectiveness and impact.

Regarding the WPGP, we conclude that it is plausible that the programme will deliver its intended results. The programme has proved to be able to access mills, to gain access to workers and to create positive impacts for workers. Recent adaptations to the programme may increase the chance that the programme is capable to deliver results faster. The transition of phase I (addressing health) to phase II (addressing rights and responsibilities) remains a point of concern (this is discussed in more detail below, in the section on *relevance*).

Regarding the community outreach programme, we conclude that the programme probably will deliver results in line with expected progress markers (increased awareness and increased knowledge). However, it is not clear yet if increased awareness and knowledge will enable community members to claim their rights (preferred and ideal progress markers). Aspects like poverty, lack of alternative employment, a culture that favors silence in girls and feels that girls should be shielded from danger, are also influencing community's ability to claim rights and address issues with employers and recruitment agents.

The work with recruiters shows mixed results. In some districts, NGO-partners chose not to work with recruitment agents. In districts where NGO-partner did reach out to them, results are mixed. Some NGO-partners mentioned that recruiters are open and ready to adopt more ethical recruitment practices. Others reported that recruiters are not yet ready to commit. Overall, we conclude that recruiters are not yet in a position to address working conditions in mills and factories.

Regarding the policy reform effort, we conclude that the programme is not on track to deliver intended results. So far, involvement of local government representatives has been largely instrumental (it is used to gain access to community members, and not used as an independent strand of the programme). Also, it is uncertain if local government representatives can influence higher-level governmental bodies. An alternative approach (for example, the Amsterdam Coalition approach, that is specifically designed to target higher level governments) may prove to be a more effective choice.

4.1.2 Relevance

We conclude that it is too early to judge the programme's relevance in addressing workers' rights at mill/ factory level. So far, the Worker Peer Group programme convincingly delivered proof of concept of phase I: we found evidence that phase I led to improved health and wellbeing in women workers while touching on basic labour rights. However, we found no consistent evidence yet supporting the assumption that phase I is a necessary or sufficient condition to progress towards phase II (stronger focus on rights and responsibilities).

Critics of the TNMS-programme have argued that the programme lacks relevance: improving health and wellbeing (although highly valued) is not the main objective of the programme. According to these critics, the programme has not sufficiently addressed issues related to workers' rights and labour laws, nor does it explain how to progress from phase I to phase II. This critique is reflected in perceptions of interviewed mill/factory managers. Interviewed managers are not necessarily aware of what the next phase of the programme is about. When asked about what they expect of phase II of the programme, managers described it as 'changing workers' behaviour and attitudes' or as 'phase I is the hardware,

phase II is the software'. Managers did not mention workers' rights as something that they expect from the next phase of the programme.

On the other hand, it can also be argued that, even without explicitly mentioning workers' rights, the TNMS programme has been able to address workers' rights and has led to workers' empowerment. Through the WPGP program, workers have learned to take responsibility for themselves - their health and wellbeing. They have learned to negotiate for more nutritious, tastier and better quality food, access healthcare in hospitals, to improve their health and stamina through exercise/games and following better hygienic practices, to reach out to others and forge bonds, to articulate their fears and frustrations. These aspects were reported by women workers, and linked to increased well-being and reduced absenteeism. The transformation process in women – from being powerless, to taking charge of themselves and others (as peer educator/ committee member/ team member/ kutty doctors)- is significant.

The community outreach programme of the TNMS programme proved to be able to increase awareness and knowledge about workers' rights, ethical recruitment and labour laws, in communities and recruitment agents. But raising awareness and increasing knowledge has not yet enabled communities to actually claim their rights. Some NGO-partners assisted community members in this regard, for example by helping them to retrieve PF-due or outstanding wages. However, a consistent, programmatic effort to enable community members to claim their rights is needed and is not yet provided by the TNMS programme.

4.1.3 Efficiency

We conclude that the TNMS-programme is partly on track to deliver its intended results according to planning.

The TNMS WPGP is behind schedule in achieving its objectives within its original timeframe, but it is plausible to assume that the WPGP can get back on track after implementation of adaptations to the programme's approach.

By July 2016, the TNMS programme has been implemented in 8 units (6 spinning mills and 2 garment factories). In these units, mainly phase I activities were carried out. This means that focus was on health-related modules and that ETI's work was mainly to build confidence between both ETI and management and ETI and workers. Phase II activities (building on phase I, addressing workers' rights and labour rights issues) have just started or are about to start. Conversations with 7 units are on-going, discussing implementation of the programme. Implementation in these units is yet to start. So, since its start in 2012, the TNMS programme has implemented half of its programme (phase I, phase II is about to start) in half of the targeted number of units (8 out of 15)²⁹.

The TNMS WPGP programme may get back on track after recent programme adaptations. After receiving critiques that the TNMS-programme was too slow to deliver results, ETI made the following adaptations to its approach:

- The programme was redesigned to move to addressing rights quicker (reduction from 6 health related modules, to 2 health related modules (food and health); integrating phase I and II). It is too early to tell what the result of this adaptation is. ETI informants expect that these adaptations will help to get the programme back on track to achieve its quantitative objectives.
- Additional funding was received to attract 20 more mills and 8000 more workers
- The TNMS team in Tamil Nadu has been strengthened with the inclusion of two training specialists.

There are also plans to hire a health professional to join the TNMS team

The budget for the WPGP programme appears to be sufficient. Several stakeholders said that the budget for the WPGP is sufficient.

²⁹ ETI (2015). ETI TNMS programme – Annual reflection. Timeline 2012-2015 (updated January 2015)

The community outreach programme is partly on track to deliver its intended results according to planning. Not all target groups were reached in all targeted districts. NGO-partners mentioned that the available budget is not sufficient.

There is a call to renegotiate the timeframe for the remaining part of the programme. Several stakeholders have argued that setting a 5-year timeline for a transformative programme such as the TNMS-programme is not realistic. Other stakeholders however, would value a more precise planning of the process of transformation.

4.1.4 Sustainability

The TNMS programme works in a complex and dynamic context and aims to change the behaviour of people that are firmly rooted in history and culture. One stakeholder said: “the TNMS programme is no quick fix! We aim to transform the sector. That will require up to 10 years. In year 0 to 2, we build confidence; year 3 to 5 aims to provide anecdotal evidence of change. To date, there is no change at systemic level. Yet. There is a sustainable change at mill and worker level. We need to create critical mass, to reach a tipping point of sector representatives that step up and say that they actually got better businesses using the TNMS programme. It is already happening. There are managers who are real ambassadors for the programme, influencing their peers to sign up as well. There is a potential for transformation!”.

We conclude that it is plausible that changes in women workers, brought about by the WPGP, are sustainable. The programme increased women’s awareness of health, increased their knowledge of healthy behaviour, and provided them with the tools to sustain that behaviour in the absence of the programme (for example in their home communities).

Change at community level is limited to increased awareness and knowledge of worker’s rights and working conditions, but has not led to consistent behaviour changes yet. Interactions between NGO-partners and community members have been brief (incidental sensitization programmes) and there is a lack of clear behaviour alternatives for community members to support their livelihoods. Therefore, we believe that to date, changes in community members cannot yet be labeled ‘sustainable’.

4.2 Recommendations

Based on the findings from fieldwork, interviews with key informants and document review, we come to the following recommendations to strengthen the second part of the programme.

4.2.1 Strengthen communication

The following measures can strengthen the flow of communication between ETI and its stakeholders:

- *Diversify information* to fit different needs of different stakeholders, for example:
 - provide brands with short, easy-to-digest, and regular bulletins, preferably containing concrete and actionable items.
 - provide members of the TNMS advisory group with in-depth insights on progress and challenges of implementation, to allow them to play their role as a critical friend.
 - provide representatives of trade unions with honest information about the programme and be clear about if and when their role can be strengthened.
- *Renegotiate the decision-making processes* with the TNMS Advisory Group and the Local Consultative Committee. Reconnect with (members of) the TNMS advisory group and of the Local Consultative Committee to renegotiate their roles in decision-making processes, to reach agreement on the level of involvement of these members in decision-making and to reach agreement on their respective roles and responsibilities in the TNMS programme.
- *Manage expectations*: some stakeholders do not always feel as an important partner (“some stakeholders are more equal than others”). Maybe their role is limited at this phase of the project

(more visible during phase II), they can be kept up to date by sharing relevant information and kept involved by valuing their input.

- *Facilitate learning and sharing.* Facilitate learning and sharing for stakeholders by providing them with access to relevant learning/ sharing platform and by regularly updating/ reminding them on the use of these platforms.

The following measures can be taken to strengthen communication on results and progress.

- *Communicate the business case for the WPGP* to increase speed in recruiting new mills and factories for the programme. Clearly describe the impacts of the WPGP on both workers and business.
- *Work with WPGP ambassadors from the business:* recruit new mills and factories by having current participating mill and factory managers, advocate the WPGP.
- *Celebrate small successes:* in projects with a long-term results horizon, regular communication about small successes can help to maintain stakeholder commitment, even when the overall objectives are still in the future. Using milestones defined in a revised Theory of Change may prove to be useful (see below).

4.2.2 Optimize the use of the multi stakeholder environment

ETI has access to a wealth of expertise, knowledge and practical assistance through the people mobilized by the TNMS programme. Effective use of this multi stakeholder environment is challenging, but can create greater impact, build bridges and build/ maintain commitment³⁰. For example, ETI can:

- Develop a strategy on how to use the expertise of each stakeholder. This requires a thorough mapping of current stakeholders' expertise and a plan of action on how to use this.
- Balance stakeholder interests. The TNMS programme appeals to a lot of knowledgeable stakeholders who are deeply committed to contribute to the elimination of exploitative practices in the garment and textile industry in Tamil Nadu. Although not all stakeholders have an equal say in the programme, it is important that stakeholders feel valued and that they receive adequate feedback on how their input is integrated into the programme.
- Adapt to a changing landscape in Tamil Nadu by actively exploring the connection or potential complementarity of new stakeholders/ projects. The textiles and garment industry is of interest for a growing number of stakeholders. Keeping contact with these new stakeholders may strengthen the (implementation of the) TNMS programme. For example, the Amsterdam Coalition (a relatively new stakeholder focusing on influencing and lobbying governments) may be able to strengthen the policy reform strand of the TNMS programme in the future. Similarly, the WPGP of the TNMS programme may be of interest for the Amsterdam Coalition as a practical tool when they start to affect workplaces. An example of another new stakeholders is The Textile Partnership³¹.

4.2.3 Optimize the use of ETI's position as trading initiative

ETI has used its unique position as trade initiative and leverage from brands to create entrance to workplaces (spinning mills and garment factories) that were inaccessible for other stakeholders. This unique position can be optimized even further to create greater impact and upscaling in the sector. For example, ETI can:

- bridge brands and workplaces: organize increased leverage from brands to get mills and factories to sign up for the TNMS programme.

³⁰ An useful read on designing and managing Multi Stakeholder Partnerships is CDIs MSP guide: Brouwer, H. et al (2016). The MSP Guide. How to design and facilitate multi-stakeholder partnerships. Wageningen: Wageningen University and Research, CDI, Freely available via <http://www.mspguide.org>.

³¹ <https://www.textilbuendnis.com/en/home/about-the-textile-partnership>

- bridge between brands: organize greater transparency in the supply chain by supporting brands in collective efforts to map value chains and suppliers.
- actively position the TNMS programme in a changing stakeholder landscape: connect to other initiatives in the region/ sector (also see above).

4.2.4 Provide stronger guidance for the journey towards sector transformation

We believe that, based on the results achieved and lessons learned so far, it is important for ETI to reformulate the programme's theory of change. The revised Theory of Change should focus at **sector transformation** as the final horizon, and demonstrate pathways towards this final goal. This revised Theory of Change can describe separate pathways of change for separate groups (e.g. a pathway for young women workers, a pathway for managers, but also a pathway for brands).

The transformation focused Theory of Change helps to understand change as a non-linear process, informs the renegotiation of a timeframe for the remaining part of the programme and guides the development of a monitoring framework towards sector transformation³².

Picture 4. Interaction with community members Dharmapuri.



³² Aidenvironment is experienced in developing monitoring frameworks for sector transformation. An example for the agricultural sector can be found online, via <http://sectortransformation.com>.

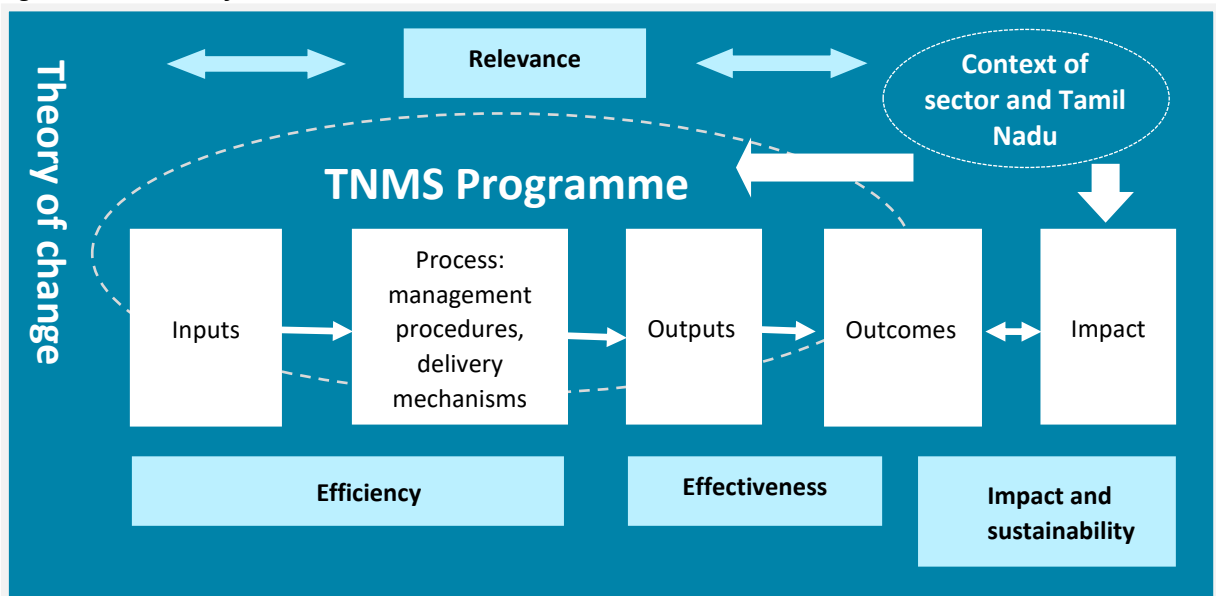
Appendices

Appendix I. Evaluation framework

The framework for this evaluation is based on

- the OECD/DAC criteria for evaluations (relevance, efficiency, effectiveness, impact and sustainability)
- the logic of impact chains, linking inputs and outputs to outcomes and impact
- influence of contextual factors.

Figure 1: Evaluation framework



Appendix II. Protocol for FGDs with women workers

GUIDELINES

FGDS with women workers should be conducted without the presence of a supervisor or manager of the worker. A group may have a size of 6-8 workers. The anonymity of workers participating in the FGD must be guaranteed. The FGD should be led by a female facilitator.

Estimated duration of group sessions: 1,5 to 2 hours (90 to 120 minutes)

During group sessions with workers, participatory methods will be used (discussions, drama, transect walks, storytelling).

BACKGROUND INFORMATION – TO BE COMPLETED BEFORE FGD

Date	Day/Month/Year:
Location of venue	
Name of mill/ factory where respondents work	
Number of workers in the group	
Age Women aged 10-14 Women aged 15-17 women aged 18+
Type of workplace (and number of women in the group that perform that type of work)	O spinning mill: ... women O garment manufacturing: ... women O other, please specify: .. women
Number of peer educators in the group	
Number of women living in hostel in the group	
Group from Tamil Nadu or migrant group? If migrant group: what is known about the origins of the women?	O from Tamil Nadu O migrant group, origins:
Number of married women in the group	O married O unmarried

TOPIC 0: INTRODUCTIONS (0-5 minutes)

Guidelines: Facilitator invited women in the rooms and

1. Introduces herself and explains why they are here/ what is the session all about (for example: to see how women experience working in the mill/ factory, what has changed recently and what could be further improved, how do they feel in general/ how is their health, how do they feel about the Nalam-programme)
2. Anonymity and confidentiality: nothing that the respondents will say during the session will be passed on to managers or supervisors, their names will not be mentioned.
3. Method: we will not just sit and talk, but also walk around the mill/factory and do some role playing exercises

TOPIC 1: WORKING CONDITIONS ON THE FACILITY – TRANSECT WALK (15 minutes)

Guidelines: the group is invited to show facilitator around on the facility (mill/factory). During this tour, participants will be invited to point out where changes in working conditions were made and to indicate how they feel working conditions could be further improved.

How long do you work in the mill?	R1: R2: R3: R4: R5: R6: R7: R8: O 0 – 6 months: women O 6 months – 1 year: ... women O 1 months – 2 years: ... women O 2 months – 3 years: ... women O + 3 years: ... women
On a 5-point scale, how satisfied are you with the working conditions in the mill / factory? Please, rate per respondent 1 to 5: 1= very unsatisfied 2= unsatisfied 3 4= satisfied 5= very satisfied Discussion: Why?	R1: R2: R3: R4: R5: R6: R7: R8:
Have working conditions changed in the mill/ factory in last 3 years (improved / got worse)? If yes: What has been changed? If no: should there have been a change?	Yes, improved: Yes, got worse: No change:
How could working conditions be (further) improved?	
Have you ever filed a complaint about working conditions to mill management/ supervisor? If yes: how was your complaint handled? Was your complaint resolved? If no: why not?	
Have there been any cases of workers doing work against their will? Has this become less or more during the last year3?	
Have there been any cases of children of age less than 16 working at the mill/ factory? Has this become less or more during the last 3 years?	

TOPIC 2 - 5: WAGES & PAYMENT, HEALTH & SAFETY, HOUSING & FOOD (DISCUSSION/ STORY TELLING, 25 minutes)

Guidelines: the group is invited back into Nalam-room (or other neutral rooms with privacy) to discuss these topics. Participants are encouraged to share their personal stories/ experiences, but also to share stories about others (if related to these topics).

Wages and payment	
<p>On a 5-point scale, how satisfied are you with your wage/ payment?</p> <p>Please, rate per respondent 1 to 5: 1= very unsatisfied 2= unsatisfied 3 4= satisfied 5= very satisfied</p> <p>Discussion: Why?</p>	R1: R2: R3: R4: R5: R6: R7: R8:
<p>Has your wage changed recently? Was it increased or decreased? Due to TNMS programme?</p>	<p>Yes, increased wage: Yes, less wage: No change: Don't know:</p>
<p>Are workers entitled to a lumpsum amount after working [specific time, 1 year, 3 years) in the mill/factory?</p>	<p>Yes: No: Don't know:</p>
<p>Is payment of this lumpsum conditional?</p> <p>If yes: conditional what (presence, worked months/years)? If yes: in your opinion, are lumpsums actually being paid to workers? Are amounts of lumpsum deducted (for example because of illness)?</p>	<p>Yes: No: Don't know:</p>
<p>Are there any deductions on wages? If yes: which ones and how much (% , Rps)</p> <p>For example: deductions for ESI/ PF?</p>	<p>Yes: No: Don't know:</p>
<p>Can worker earn bonuses (for example when they have completed a certain period of employment)? If yes: please describe how, when, conditions frequency of awarding bonuses</p>	
<p>Do you have an ESI card?</p>	<p>Yes: No: Don't know:</p>
What is the minimum wage for a women worker?	
Health and safety	
How satisfied are you with your health?	R1:

Please, rate per respondent 1 to 5: 1= very unsatisfied 2= unsatisfied 3 4= satisfied 5= very satisfied Discussion: how healthy are women workers in the mill/factory?	R2: R3: R4: R5: R6: R7: R8: Explanation:
Do you experience problems related to working in the mill/ factory with: <ul style="list-style-type: none"> - Heat - Humidity - Noise (from machines) - Dust - tiredness 	
Has your health changed in the past 3 years? How/ why? Due to TNMS programme?	Yes, improved health: Yes, health got worse: No change: Due to programme?
How could worker's health be improved?	
Is there personal protective equipment available? Do you use them? Why?	Yes: No:
Do there occur accidents in the mill/ factory? Has this become more or less over the last 3 years?	Yes: No:
Have there been any medical checks during the past 3 years?	

Food safety and quality	
How satisfied are you with the food provided by the hostel/ mill/ factory? Please, rate per respondent 1 to 5: 1= very unsatisfied 2= unsatisfied 3 4= satisfied 5= very satisfied Discussion	R1: R2: R3: R4: R5: R6: R7: R8: Explanation:
Has this changed (improved/ got worse)? <ul style="list-style-type: none"> - during the last 3 years? - Due to the TNMS programme? 	Yes, it has changed: No change:
Have workers addressed food quality and safety with mill/hostel management? If yes: how did management respond? Was this due to TNMS programme? If no: why not?	Yes: No:

Housing conditions (ONLY IF RESPONDENTS STAY IN HOSTEL)	
<p>How satisfied are you about the living conditions in the hostel?</p> <p>Please, rate per respondent 1 to 5: 1= very unsatisfied 2= unsatisfied 3 4= satisfied 5= very satisfied</p> <p>Discussion</p>	R1: R2: R3: R4: R5: R6: R7: R8:
<p>Have living conditions in the hostel changed during the last 3 years?</p> <p>If yes: how? Were changes due to the TNMS programme? What changes would you further like to see?</p> <p>If no: what changes would you like to see</p>	Yes: No change:
How many workers are living per hostel/ per room?	
How could living conditions in the hostel be improved?	
<p>How do you spend your free time? (for example: resting, going out, visiting friends/ family, contacting friends/family, using entertainment facility in the hostel/mill)</p> <p>Has this changed over the last 3 years?</p> <p>Were changes due to the programme?</p>	
How would you like to spend your free time?	

Interaction with supervisors	
<p>How satisfied are you with your interaction with supervisors?</p> <p>Please, rate per respondent 1 to 5: 1= very unsatisfied 2= unsatisfied 3 4= satisfied 5= very satisfied</p> <p>Discussion</p>	R1: R2: R3: R4: R5: R6: R7: R8:
<p>Has this changed (improved/ got worse)?</p> <ul style="list-style-type: none"> - during the last 3 years? - Due to the TNMS programme? 	Yes, improved: Yes, worsened: No change:
Example of recent interactions with supervisor	
How could your interaction with supervisors be improved?	

TOPIC 6. WRAP UP AND CONCLUSION (5 minutes)

Guidelines: ask the women about personal opinions/ perceptions on the session and invite them to briefly share remaining stories. Facilitator provides brief summary of lessons learned/ points mentioned. Facilitator thanks women for participating.

Appendix III. List of Key Informants

Number of respondents	Name respondent	Organization/ function
1	Vijaya Srinivasan	Researcher AMBEKAR, Institution of Labour Studies
2	Hannah Shoesmith	CSR Lead, Mothercare (brand/ member)
3	Apoorva Kaiwar	IndustriALL
4	Martin Buttle	Category leader apparel and textiles, ETI
5	Peter Mcallister	CEO ETI
6	Dr. K. Suvetha	PSG Institute of Medical Science & Research
7	T. Prabhu	Deputy General Manager Cotton Blossom
8	Mr. A. M. Gopu	General Manager Jay Textiles II
9	Divya	Peer Educator RRD Tex
10	Thamarachelvi	Peer Educator Carona
11 & 12	Mr. Saravanan & Mr. Karthikeyan	General Manger Carona & Deputy General Manager
13	Jaya Merlin	Peer Educator and nurse, BEST Corporation
14	Shankar	Team leader DEEPS, NGO-partner Dharmapuri
15	Hedvees Christopher	ETI South India Programme Coordinator
16	Gayathri Jeganathan	ETI Worker Peer Group coordinator
17	Poomali Seshanchawdi	Recruiter Salem
18	A. M. Kannan	Recruiter Salem
19	Krishnan	Salem, Trade Union Representative, supervisor, union leader of LPF (Labour Progressive Federation)
20	Mohan Kumar	Secretary and chief functionary K-Rope, NGO-partner Salem
21	Mr. Ramadass	Director READ Foundation, NGO-partner Cuddalore
22	Jayanthi	recruiter Cuddalore
23	V. R. Jaganathan	General secretary INTUCs garment and textile federation
24	Martje Thews	Researcher SOMO
25	Meena Varna	Director Dalit Solidarity Network UK (DSN)
26 & 27	Sabita Banerji & Debbie Coulter	Monitoring & Evaluation officer/ head of programmes, ETI
28	Libby Annat	Ethical Trade Officer Primark/ Lead of Amsterdam Coalition, brand/ member
29	Prithiviraj Sinnathambi	CARE-T, secretariat of Tirupur's Peoples Forum
30	Thiligam Ramalingam	Local representative IndustriALL
31	Jane Tate	Homeworkers Worldwide
32	Gemma Freedman	Trade Unions coordinator, ETI

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Appendix V. Activities and responsibilities within Worker Peer Group Process – Phase I

Table V.5: WPGP process

Activities WPGP	Responsible organization/ lead
Identifying Mills/Garments through Brands and Retailers, Associations like SIMA and TEA	ETI Head Office & Tamil Nadu team
Nalam programme concept note sharing and first meeting with mill top management	ETI Tamil Nadu team
Once agreed, sensitization meeting with the middle and upper management team conducted	Lead by ETI- Introducing PSG partner. Then PSG will do their presentation of the implementation steps of the health phase
Health needs assessment (HNA)	Baseline survey lead by PSGIMSR - Coordinated and supported by ETI
Health Needs Assessment report sharing with the Top Management team, Regular programme updates meeting with top and middle management team	ETI
Formation of Peer educators and orientation to the peer educators	Initiated by ETI. PSGIMSR takes the lead in orienting them about their roles in health phase.
Nalam Phase I-Health Module -1 Nutrition	Lead by PSGIMSR, ETI takes part in this session, supports dry run by peer educators to build confidence
Refresher Training on Nutrition	Lead by PSGIMSR. ETI takes part of this session.
Support Activity- Hostel menu changes	Menu change by PSGIMSR, Implementation of the changed menu and followup by ETI during follow up visits.
Support and monitoring visit- observing peer educators session and giving feedbacks, meeting with management team, for adaptation/modifications, if any, based on workers' feedback	ETI
Referral and linkages in the existing health system and facilities based on workers needs- Primary Health Centres, District Directorate of Health Services, Social Welfare Department, ESI district level as well as dispensary level linkages based on needs expressed by workers during interactions	ETI
Health Module-II Reproductive Health, Personal and Menstrual hygiene	Lead by PSGIMSR, ETI takes part of the meeting, supports dry run
Refresher Training	Lead by PSGIMSR – ETI also takes part in the training and supports
Supportive Activity- Hand washing event among peer educators and management team.	Lead by ETI, coordinated with PSGIMSR, ESI, PHC medical doctors for this event. Implementation of these changes in behaviour is usually observed by ETI during follow up visits.
Support and monitoring visit- observing peer educators session, giving feedback, meeting with management team, adaptations for local need as required	ETI

Referral and linkages in the existing health system and facilities based on the worker's needs- Primary Health Centres, District Directorate of Health Services, Social Welfare Department, ESI district level as well as dispensary level linkages based on the expressed needs from the workers' end- Deworming and Iron tablets, Free sanitary napkins, etc., based on their needs.	Lead by ETI TN Team
Health Module III: Maternal and Child Health Supportive Activity: Referral and linkages about taking Iron tablets from ESI and PH-ETI	Module and refresher by PSG Supportive Activity lead by ETI
Health Module IV- Ergonomics Supportive Activity: Usage of Personal Protective Equipments and its benefits	Module and refresher by PSG Supportive Activity lead by ETI
Health Module V- Non Communicable Diseases Supportive Activity: Self Breast Examination- PSG Referral and linkages with PHC for Cervical Screening-ETI	Module and refresher by PSG Supportive Activity lead by ETI
Health Module VI- Stress Management or STI/HIV/AIDS/Hepatitis Diseases- PSG Supportive Activity: Referral and linkages with health facilities based on needs expressed by workers-ETI	Module and refresher by PSG Supportive Activity lead by ETI
Endline Assessment	PSGIMSR