Labour Reform Commission

Transforming the World of Work

A Visionary Roadmap
for
Worker Rights • Harmonious Industrial Relations • Inclusive and Equitable Development

Commission Report
April 2025



This is a synopsis of the Labour Reform Commission Report. The full report (Bangla) contains detailed statements of demands, lists of names, and attendance records of the consultation meetings held with various individuals, agencies, organisations, and institutions.

These are available on the website: https://bilsbd.org/others/

Members of the Commission

Md. Razequzzaman (Ratan)
President, Socialist Worker Front

Anwar Hossain
Joint Coordinator, Worker Employee Unity Council, and President, Bangladesh Nationalist Worker Party

Ariful Islam
Media Worker

Dr. Ananya Raihan
Economist, and Chairperson, Isocial

Farooq Ahmed
Secretary General and CEO, BEF

A N M Saif Uddin
Member, Standing Committee, BGMEA

Fazle Shamim Ehsan
Managing Director, Fatullah Apparels Limited, and Member of Committee, BEF

Syed Nasim Manzur
Managing Director, Apex Footwear Limited, and Ex Member of Committee, BEF

Barrister Nihad Kabir
Senior Partner, Syed Istiak Ahmed & Associates, and Ex Member of Committee, BEF

Mostafa Al Hossain Akil
Student Member, Labour Reform Commission

Taslima Akhter
Chairperson, Bangladesh Garment Worker Solidarity, Acting Chairperson, Bangladesh Trade Union Federation, and Photographer

Md. Shakil Akhter Chowdhury
General Secretary, Bangladesh Labour Federation – BLF

Kamran Tanvirur Rahman
Ex President, Bangladesh Employers' Federation

Advocate A K M Nasim
Ex President, Bangladesh Labour Court Bar Association, and Country Programme Director, Solidarity Centre – Bangladesh

Tapan Dutta
President, Chattogram Divisional Committee of Bangladesh Trade Union Centre-TEUC

Dr. Jakir Hossain
Professor, Institute of Bangladesh Studies, Rajshahi University

Dr. Mahfuzul Haque
Ex Secretary, Ministries of Labour and Employment and Environment

Syed Sultan Uddin Ahmmed
Head of the Commission
Executive Director, Bangladesh Institute of Labour Studies

Contents

Message from the Head of the Labour Reform Commission 10
Acknowledgement 13
Abbreviations 15
Overall Reflection of the Proposals 18
1. Introduction 23
1.1 Background 23
1.2 The Objectives and the Scope of Work of the Commission 26
1.3 Working Methodology, Technical Committee Profile and stakeholder Mapping: 31
1.4 Overview of Report Sections 31
2 Structure of Labour Reform Proposal 33
2.1 Basis of Reform Structure 33
2.2 Reform Principles: 36
2.3 Issues Considered to Formulate Recommendations 37
2.4 Issue-based Structure of Reform Proposal 39
2.5 Main Structure of the Proposal 41
3. Issue-Based Fundamental Reform Proposals 44
3.1 Recognition of Work and Occupation, Right to Work, Opportunity, Skill, Permanence and Assurance 44
3.1.1 The Applicability of the Labour Law and Recognition of Workers 44
3.1.2 Legal protection and assurance of workers' job 46
3.1.3 National Labour Force Registration System and National Labour Database 48
3.1.4 Outsourcing and Contractual Employment 53
3.1.5 Creation of Employment Opportunities, Right to Work, and Ensuring Decent Work . 54
3.1.6 Skill and Human Resource Development, Productivity, and Sustainable Enterprise .. 56
3.1.7 Preparing for Overcoming the Challenges of the Fourth Industrial Revolution (4IR) 60
3.1.8 Addressing Regional Disparities and Promoting Balanced Urbanisation 61
3.1.9 Sectoral Employment 62
3.2 Wage and Just Share 66
3.2.1 Universal National Minimum Wage and Sectoral, Regional, and Occupational Minimum Wages 67

3.2.2 Standards and Methods for Wage Determination 69
3.2.3 Rationalisation of Production Targets and Piece-rate Payment Determination 71
3.2.4 Wage Growth Rate and Payment Process 71
3.2.5 Workers' Earned Entitlements 71
3.2.6 Mandatory Contingency Fund and Wage Insurance 72
3.2.7 Accountability and Responsibility 73
3.2.8 Wealth Inequality and Just Share 73
3.2.9 Industrialisation, Productivity, and Sustainable Business 74
3.3. Safe Work, Healthy Working Environment, and Workers' Health Services 76
3.3.1 Amendment and updating of the legal framework and policies on occupational safety and health to ensure universal safe work and a healthy working environment for all 78
3.3.2 Weaknesses in the Enforcement of Labour Laws and Labour Inspection, and Lack of Coordination among Relevant Agencies 84
3.3.3 Ensuring Implementation of National and International Standards of Workplace Safety, Hazard Identification, and Inclusion of Environmental Concerns 86
3.3.4 Identification, Reporting, and Compensation for Occupational Diseases and Illnesses 88
3.3.5 Accidents, Complaint Procedures, Compensation and Rehabilitation 90
3.3.6 Ensuring Workers' Access to Standard Healthcare 93
3.3.7 Education, Training, Research, Data Management, and Monitoring in Occupational Safety and Health 94
3.3.8 Occupational health and safety provisions applicable to specific and hazardous occupations, and the projects to be undertaken for their implementation 95
3.4 Social Security and Welfare 98
3.4.1 Universal 'Life-Cycle-Based' Social Protection for All Workers 98
3.4.2 Workplace Accident Protection and Welfare 101
3.4.3 Protection from Unemployment and Sudden Job Loss 102
3.4.4 Maternity 103
3.4.5 Retirement and Future Security 104
3.4.6 Protection of Workers' Families and Children 105
3.4.7 Day-care Facilities 106
3.4.8 Health Protection 106

3.4.9 Protection of Workers with Disabilities 107
3.4.10 Workers' Housing..... 108
3.4.11 Protection and Welfare of Migrant Workers 109
3.4.12 Awareness about Social Protection and Grievance Redress 109
3.5 Right to Organise, Participate, Represent, and Bargain Collectively 110
3.5.1 Universal Right to Organise and Inclusion 112
3.5.2. Proposal for an Integrated and Inclusive Trade Union Structure.....112
3.5.3. Protection of Unions During the Organisation Phase 114
3.5.4. Trade Union Registration Process.....115
3.5.5 Role of Trade Union Federations as Collective Bargaining Representatives 117
3.5.6 Representation of Workers in Committees, Commissions, and Delegations.....118
3.5.7 Policy Framework for Establishing Strong Trade Union Federations to Ensure Strong Representation.....119
3.6 Industrial Unrest, Dispute Resolution, and Access to Justice 120
3.6.1 Remedies and Access to Justice in Case of Rights Violations..... 121
3.6.2 Recommendations for Dispute Resolution 123
3.6.3 Reform of Laws and Policies for the Prevention and Resolution of Labour and Industrial Disputes 126
3.6.4 Institutional and Legal Measures for the Prevention of Labour Unrest..... 127
3.6.5 Labour Courts and the Labour Appellate Tribunal 128
3.6.6 Legal and Institutional Measures to Prevent the Criminalisation of Workers 131
3.6.7 Ensuring Timely Payment of Workers' Wages 132
3.6.8 Legal Protection for Solidarity Actions in Support of Workers' Movements..... 133
3.6.9 Recommendations regarding Workplace Cooperation Committees and Workers' Representation..... 133
3.6.10 Security of Workers, Enterprises, and Industrial Zones..... 134
3.7 Equality, Non-Discrimination and Inclusion 135
3.7.1 Elimination of Discriminatory Practices in the Workplace 136
3.7.2 Ensuring Universal Maternity Protection 137
3.7.3 Elimination of Wage Disparities..... 138
3.7.4 Elimination of Discriminatory Practices against Women..... 138

3.7.5 Elimination of Gender-Based Violence and Harassment in the Workplace 140
3.7.6 Elimination of Discrimination in Promotion 142
3.8 Child Labour, Adolescent Workers and Forced Labour 143
3.8.1 Minimum Age for Employment 143
3.8.2 The Right to Quality Education and Access to Technical Skills 144
3.8.3 Monitoring and Inspection of Labour Standards 144
3.8.4 Responsibility, Accountability and Penalty 145
3.8.5 Protection Measures for Poor Families 146
3.8.6 Considerations in the Preparation of the Action Plan and Evaluation of Previous Activities 146
3.8.7 Regular Updating of Hazardous Work List 147
3.8.8 Responsible Business Conduct 147
3.8.9 Elimination of Forced Labour and Modern Slavery 148
4. Proposals Institutions Related to the Labour Sector 150
4.1 Ministry of Labour and Employment 151
4.1.1 Department of Labour Inspection 152
4.1.2 Recommended Structure and Functions of the Directorate of Labour and Industrial Relations 152
4.1.3 Recommended Structure and Functions of Directorate of Skills and Employment Development 153
4.1.4 Directorate of Workers' Social Protection and Welfare 155
4.1.5 Wings of the Ministry of Labour and Employment 158
4.1.6 Special Recommendations 160
4.1.7 Accountability, Partnership, and Collaboration 160
4.1.8 Strengthening Tripartite Mechanisms and Structures 162
4.1.9 National Wages Commission 162
5. Issue-Based Reform Proposals 164
5.1 Responsible Business Conduct in the Context of Business and Human Rights 164
5.2 Climate Change and Just Transition 167
5.3 Measures on Social Conditionality in Trade, Investment, and Public Procurement 171
6. Reform Proposals for the Rights and Welfare of Special Labour Groups 173

6.1 Marginalised Labour Groups by Gender, Age, and Special Needs 173
6.1.1 Women Workers 173
6.1.2 Third Gender / Hijra Community 177
6.1.3 Youth Labour Population 177
6.1.4 Elderly Labour Force 178
6.1.5 Indigenous Peoples / Ethnic Minorities 179
6.1.6 Workers with Disabilities 180
6.1.7 Migrant Workers 182
6.1.8 Sanitation Workers / Waste Management Workers / Dalit Communities 190
6.1.9 Workers Affected by Climate Change and Natural Disasters 191
6.2 Agriculture-Based Labour Groups 192
6.2.1 Agricultural Workers 192
6.2.2 Rice Mill Workers (Chatal Workers) 193
6.2.3 Tea Workers 194
6.3 Export-Oriented Industries and Area-Based Labour Groups 194
6.3.1 Garment (Ready-Made Garment/RMG) Sector Workers 194
6.3.2 Shrimp Industry Workers 196
6.3.3 Tannery Workers 197
6.3.4 Workers in Export Processing Zones (EPZs) 198
6.3.5 Dock and Port Workers 199
6.4 Industry-Based Labour Groups 200
6.4.1 State-Owned Closed Mills 200
6.4.2 Ship-Breaking Industry 201
6.4.3 Small-Scale Footwear Industry Workers 203
6.4.5 Furniture Workers 204
6.4.6 Stone-Breaking Workers 205
6.5 Service-sector-based Worker Groups 206
6.5.1 Railway Workers 206
6.5.2 Inland Water Transport Workers 206
6.5.3 Road Transport 207
6.5.4 Rickshaw/Battery Rickshaw–Easybike/Van Drivers 208

6.5.5 Construction Workers 210
6.5.6 Private Health Sector 211
6.5.7 Hotel and Restaurant Workers 212
6.5.8 Domestic Workers 213
6.5.9 Care Workers 214
6.5.10 Beauty Parlour Workers 215
6.5.11 Community Centre and Decorator Workers 215
6.5.12 Union Digital Centre (UDC) Workers 216
6.6 Occupational Groups 218
6.6.1 Journalists/Media Workers 218
6.6.2 Fishers and Fisherfolk Workers 219
6.6.3 Hawkers/Self-Employed Urban Informal Workers 221
6.6.4 Market/Shop Employees 222
6.6.5 MLSS/Watchman Staff 223
6.6.6 Medical Representatives / Sales and Marketing Staff 223
6.7 Workers under Special Employment Arrangements 225
6.7.1 Outsourced Workers 225
6.7.2 Ride-Sharing / Gig / Platform Economy Workers 226
6.7.3 Home-Based Workers 227
7. Special Proposals 228
7.1 Labour Force Surveys, Research, and Education 228
7.2 Budget Allocation 228
7.3 White Paper Preparation 229
Appendix 230
Appendix 1.3.1: List of Technical Committee Members 230
Appendix 1.3.2: List of Organisations Participating in the Meeting 235
Appendix 1.3.3: List of Individuals and Organisations Submitting Petitions and Written Opinions 246
Appendix 4.3: List of Consultation Meetings with Workers, Employers, Professionals, Labour and Human Rights Organisations, and Labour-related Institutions 255

Message from the Head of the Labour Reform Commission

‘We

Shall no longer remain underfoot

Listen, O fishermen brother,

This time we will rise, defying everything’

A hundred years ago, at the fishermen’s conference in Madaripur, our National Poet Kazi Nazrul Islam sang this very awakening song, calling upon the oppressed to rise against all forms of inequality and deprivation. Yet a century later, the aspirations of Bangladesh’s working people remain painfully unfulfilled. They remain trapped within the same circle of deprivation. While society has advanced, the lives of workers have remained unchanged—left behind by the mainstream tide of development.

On the threshold of the Fourth Industrial Revolution, the working people of Bangladesh continue their daily battle against poverty, against the uncertainty of work and livelihood. They pass their days haunted by the fear of an uncertain future. Generation after generation has struggled for the hope of a better, dignified life, yet that cherished life remains beyond their reach.

It was precisely the dream of overcoming this very situation that we envisioned in 1971, in '90, and again in July '24. With the yearning for a just, equitable society and a dignified Bangladesh, the uprising of students, workers, and ordinary citizens on that July day set in motion the journey of labour-sector reforms. We pay homage with deep reverence to all the children, students, workers, and citizens who became martyrs in that great uprising, and express our heartfelt sympathy to the injured. We also solemnly remember all those who sacrificed their lives in our Liberation War, in every democratic movement, and in the long struggle for workers’ rights and freedom.

The flawed vision that “any work is better than no work” and “cheap labour is our strength”—an erroneous vision long held by policymakers—has stood as a barrier to the country’s development, industrialisation, decent and dignified work, and the workers’ rightful share of the wealth they create. Bangladesh has earned the tragic reputation of being the land of cheap labour and recurring industrial disasters.

In such a landscape of long-standing deprivation, the formation of the Labour Reform Commission—fifty-four years after independence—is a milestone. For this initiative, we express our sincere gratitude to the Honorable Chief Advisor of the current interim government and to all those involved. We also offer our heartfelt thanks to the Ministry of Labour and Employment, its departments, and all government institutions that supported us. With complete sincerity, mutual trust, and respect, the members of the Commission worked tirelessly, enabling us to present a

consensus report to the nation. Representatives from various institutions and organisations, economists, researchers, lawyers, and journalists all contributed to this vast undertaking—we extend our deep appreciation to them. We are especially grateful to the national trade unions, sectoral federations, human rights and labour rights organisations, and national and international development partners— including the Sramik Karmachari Oikya Parishad (SKOP)—for carrying forward the struggle for workers' rights. And we also thank the Bangladesh Employers' Federation and its member organisations for their participation in dialogue, for their advice, and for their cooperation.

Till now, the State's initiatives for protecting workers have been limited mostly to the formal sectors that comprise only 15% of the workforce. The vast majority of people who sell their labour have no legal recognition, no social security. Without the right to organise or bargain collectively, they remain deprived of their fair share, and industrial relations continue to suffer. In the name of regulations, the authorities burn the nets of fishermen, seize the rickshaws of rickshaw-pullers—their lone means of survival. Workers remain temporary for years, even after doing the same work at the same workplace. Industrial zones rise without ensuring basic civic services. Major accidents claim workers' lives, yet there is no justice for these deaths born of negligence, and compensation becomes a cruel mockery of the value of a worker's life. Inequality pervades wages, maternity leave, and so many other rights. Migrant workers, women workers, indigenous and disabled workers—within the deprived, they are the most deprived. Traditional and once-thriving labour sectors are slowly disappearing. There is not even a national mechanism for determining minimum wages. The dignity of labour—and of workers—has sunk to its lowest depth. Before the world, Bangladesh stands identified as a land of cheap labour.

Ensuring workers' rights and fair shares is indispensable for building a just, dynamic society and achieving sustainable development. Without uprooting the culture and social structures that have long ignored this truth, the dream of an equitable, dignified Bangladesh cannot be realized. In this reality, transforming the labour landscape of Bangladesh requires serious consideration of every recommendation of the Commission.

The Fourth Industrial Revolution, artificial intelligence, and climate change are constantly reshaping business, work, and the world of labour. We must prepare ourselves. As a member of the United Nations, the ILO, and various international bodies; as a signatory to international labour standards; as a country committed to achieving the Sustainable Development Goals by 2030—Bangladesh must fundamentally transform its labour framework to fulfill the upcoming commitments regarding international trade, human rights, and environmental compliance as a developing nation. Building a productive, skilled labour force demands a national strategy. Creating an innovative class of entrepreneurs requires education, skill development, and collaboration across industries. To create employment, we must remove barriers and bureaucratic delays inhibiting business growth. Through consultations across the country, we have heard not only of workers' deprivation but also the multifaceted challenges and barriers facing industry and business. To build a nation driven by gainful employment, an advanced economy, and dignified industries, the State must adopt targeted initiatives— chief among which is the creation of a skilled workforce and young entrepreneurs.

We believe these recommendations will offer a pathway to protecting the rights and improving the lives of eight crore working people, creating remedies against inequality, and fostering a culture of effective social dialogue—from the factory floor to the national level. This will bring together all national and international stakeholders in the labour world, enabling the building of a labour sector that reflects the hopes of all, and supporting the rise of a competitive national industry.

Workers' rights and welfare, a sustainable and dynamic industrial sector, harmonious industrial relations, inclusive and equitable development, fair shares, and social justice—each is inseparably linked to the others. The Commission has emphasised the need for enhancing productivity at the factory, industrial, and national levels, and for removing business obstacles to foster the growth of national industries. The Commission hopes that the interim government will begin certain short-term and priority reforms during its tenure—reforms the next elected government will carry forward. We hold the same hope for all political parties and policymakers of the nation.

A National Social Dialogue Forum, as proposed by the Commission, can lay the foundation for national consensus and craft a roadmap for comprehensive reform.

We firmly believe that by strengthening labour rights, Bangladesh can emerge before the world as a dignified and powerful nation. We can achieve this—we must achieve this.

"These dull, defeated, silent voices
Must be given speech—
From these worn, dry, broken hearts
Hope must be awakened…"

This *Visionary Roadmap for Transforming the World of Work* strives to give voice to the "speechless faces" Rabindranath Tagore spoke of over a century ago. By advancing this blueprint together, we can restore hope in the lives of eight crore working people and their families, and build a Bangladesh worthy of dignity.

Syed Sultan Uddin Ahmmed
Head, Labour Reform Commission

Acknowledgement

We extend our sincere thanks and gratitude to the Hon'ble Chief Adviser and the members of the Advisory Council of the Interim Government for forming the Labour Reform Commission and giving the responsibility of the Commission to improve the rights and living standards of workers, thereby honoring the citizens' aspirations arising from the student-worker-mass movement during the July 24 uprising. We also thank the Cabinet Division, the Ministry of Labour and Employment and its departments for their wholehearted cooperation. This report is the result of tireless effort, dedicated contributions, and the concerted work of the research and report-writing teams, the issue-based technical team, various organisations, and individuals, under the comprehensive guidance of the members of the Commission. We extend our heartfelt thanks and gratitude to all of them.

Our sincere gratitude goes to the stakeholders who enriched the work of the Commission, including the preparation of this report, by dedicating their valuable time, advice, opinion, and assistance. The wholehearted support of national trade unions and Workers' Rights Organisations, sector-and organisation-based federations, international trade union agencies, employers' associations, national and international development partners, human rights organisations, women's organisations, the heads and members of other commissions, researchers, economists, teachers, lawyers, professionals, and both government and non-government organisations played a pivotal role in completing our task.

We extend our sincere gratitude to all who participated in the stakeholders' consultation. Their constructive discussions and presence were immensely valuable to this report. We offer special thanks to the Ministry of Labour and Employment and its departments for providing secretarial support. Similarly, we thank various national and international labour organisations, human rights organisations, and professional organisations for their comprehensive support, including secretarial assistance, research, report preparation, and the provision of many useful documents.

Our special gratitude also goes to the officials of the district administration for their wholehearted support in arranging meetings outside Dhaka, as well as to the police and security personnel who ensured safety for all the arrangements.

We extend our special gratitude to the research and report committee, the members of various technical committees, and the secretarial team engaged in the commission's tasks (names attached) for preparing this report through their five-month-long tireless efforts. As a result of their responsiveness and hard work, this report has taken the shape of a useful document.

During this long journey, the mass media has been our partner. On the one hand, they have presented the voices of working people to the commission, and on the other, they have shared the commission's activities with the public.

The commission is deeply grateful to all individuals and organisations that have contributed to this monumental task. We are hopeful that, with the implementation of these recommendations, it will be possible to ensure the well-being of the country's workers, promote an impartial and equitable

working environment, and improve people's living standards as well as national development through the establishment of balanced industrial relations.

(The Commission, with due respect, has attached the list of all individuals, agencies, associations, and organisations that have been directly and indirectly involved with its tasks.)

Abbreviations

ADR – Alternative Dispute Resolution
AI – Artificial Intelligence
BAIRA – Bangladesh Association of International Recruiting Agencies
BANBEIS – Bangladesh Bureau of Educational Information and Statistics
BBS – Bangladesh Bureau of Statistics
BEF – Bangladesh Employers' Federation
BEPZA – Bangladesh Export Processing Zones Authority
BIDA – Bangladesh Investment Development Authority
BILS – Bangladesh Institute of Labour Studies
BLA – Bangladesh Labour Act
BLR – Bangladesh Labour Rules
BMET – Bureau of Manpower, Employment and Training
BNQF – Bangladesh National Qualifications Framework
BNSK – Bangladesh Nari Sramik Kendra
BOESL – Bangladesh Overseas Employment and Services Limited
BTEB – Bangladesh Technical Education Board
CBA – Collective Bargaining Agreement / Agent
CBLM – Competency-Based Learning Materials
CEDAW – Convention on the Elimination of All Forms of Discrimination Against Women
CRC – Convention on the Rights of the Child
CRPD – Convention on the Rights of Persons with Disabilities
CSDDD – Corporate Sustainability Due Diligence Directives
DEMO – District Employment and Manpower Office
DIFE – Department of Inspection for Factories and Establishments
DoL – Department of Labour
DWCP – Decent Work Country Programmes
EIS – Employment Injury Scheme
EOBI – Employees' Old-Age Benefits Institution
EPZ – Export Processing Zone
ESDO – Eco-Social Development Organization
ESRM – Environmental and Social Risk Management
ETI – Ethical Trading Initiative
EU – European Union
FAO – Food and Agriculture Organization
GBVH – Gender-Based Violence and Harassment
GIZ – German Development Agency
GoB – Government of Bangladesh

GRM – Grievance Redressal Mechanism
GRS – Grievance Redressal System
GSI – Global Slavery Index
GSP+ – Generalized System of Preferences Plus
HRDD – Human Rights Due Diligence
IBC – Industrial Bangladesh Council
ICCPR – International Covenant on Civil and Political Rights
ICESCR – International Covenant on Economic, Social and Cultural Rights
ICLS – International Conference of Labour Statisticians
ICT – Information and Communication Technology
ILO – International Labour Organization
IMT – Institute of Marine Technology
IRI – Industrial Relations Institute
ISU – Industrial Safety Unit
ITPs – Indigenous and Tribal Peoples
LDC – Least Developed Country
LEED – Leadership in Energy and Environmental Design
LFS – Labour Force Survey
LIMA – Labour Inspection Management Application
LIMS – Labour Information Management System
MoLE – Ministry of Labour and Employment
NAP – National Action Plan
NEET – Not in Employment, Education, or Training
NEP – National Employment Policy
NID – National Identity Card
NIPSOM – National Institute of Preventive and Social Medicine
NOSHTRI – National Occupational Safety and Health Training and Research Institute
NSDA – National Skill Development Authority
NSDP – National Skills Development Policy
OECD – Organisation for Economic Co-operation and Development
OMS – Open Market Sale
OSH – Occupational Safety and Health
OSHA – Occupational Safety and Health Administration
PPE – Personal Protective Equipment
PPP – Public-Private Partnership
QWRS – Quarterly Wage Rate Survey
RBC – Responsible Business Conduct
RMG – Ready-Made Garments

SCDDA – Supply Chain Due Diligence Act
SDGs – Sustainable Development Goals
SEZ – Special Economic Zone
SOP – Standard Operating Procedure
STEM – Science, Technology, Engineering, and Mathematics
TCC – Tripartite Consultative Council
TTC – Technical Training Centre
TVET – Technical and Vocational Education and Training
UDHR – Universal Declaration of Human Rights
UNCRPD – United Nations Convention on the Rights of Persons with Disabilities
UNGC – United Nations Global Compact
UNGPs – United Nations Guiding Principles on Business and Human Rights
WARBE – Welfare Association for the Rights of Bangladeshi Emigrants
WEF – World Economic Forum
WHO – World Health Organization
WRI – Wage Rate Index
WSUP – Water and Sanitation for the Urban Poor
WWA – Workers' Welfare Association
WWF – Workers' Welfare Fund

Overall Reflection of the Proposals

One of the basic principles of governing the state of Bangladesh, as directed by the Constitution, is ensuring the freedom of the working class from all forms of oppression. The primary goal of the state is to establish a society where the rule of law, fundamental human rights, freedom, justice, and political, economic, and social equity are ensured for all citizens. The central aspiration of our great struggle for independence and the bloody uprising of students, workers, and the masses in July ’24 was to establish Bangladesh in a position of dignity by building a just and discrimination-free society. Reflecting this collective aspiration, the Interim Government established the ‘Labour Reform Commission’ on 18 November 2024 with the aim of providing necessary reform recommendations to safeguard workers’ rights and well-being. The commission, formed 54 years after our independence, believes that it is impossible to build a discrimination-free society without placing labour, workers and their rights at the center in order to address the prevailing inequalities in Bangladesh’s labour sector.

This recommendation has been formulated through consultations with more than one hundred stakeholders, with the aim of ensuring workers’ civic rights, dignity of life and livelihood, genuine trade union representation, and non-discriminatory opportunities. The Commission believes that employment opportunities, industrial productivity growth, and democratic transformation are integral to safeguarding workers’ rights and well-being in Bangladesh. Thus, this is not only important for workers but also in the interest of the country and its people. Workers’ rights are part of the Constitutional rights in Bangladesh. Similarly, they form part of the country’s commitment to achieving specific labour standards as a member state of various international agencies. It is therefore an important responsibility of the state to formulate policies and laws, develop and implement plans, and uphold the principles of universality and inclusiveness. The Commission holds the view that it is possible to establish a discrimination-free and dignified Bangladesh, grounded in justice, only by ensuring workers’ rights through targeted programmes, guaranteeing workers a fair share in industrial growth, and securing their inclusion in the benefits of development.

In light of the recommendations formulated through coordinated discussions, the Commission recommends that the Government play a necessary role in legally protecting and implementing the rights of all workers engaged in the formal, informal, and agricultural sectors in Bangladesh. At the same time, the Commission urges the State to play a pivotal role in ensuring legal recognition for effective implementation, structural development, and the prevention of violations. The salient features of the Commission’s overall recommendations are highlighted below.

1.1. Legal protection and recognition of all workers

Labour law should be upheld by the State for all workers, including those employed in the formal, informal, agricultural, domestic, migrant, and self-employed sectors.

To this end, effective measures must be taken to ensure recognition of labour through the issuance of identity cards, continuous employment, guaranteed income, and a dignified and decent work environment. At the same time, measures must be taken to prevent irregular or temporary employment practices and the growing trend of agency-dependent appointments.

The suggested measures include:

a) The right to receive fair participation in development, as well as a living wage adequate for workers and their families.

b) The right to safe and healthy working conditions, appropriate compensation in the event of accidents, and access to health care for workers and their families.

c) Retirement benefits for all, along with social protection in adverse situations such as inability to work, illness, or maternity, and inclusion in some forms of social safety net schemes.

d) The assurance of protection of rights for all workers, including the right to assemble for fair wages, collective representation, the ability to lodge complaints against rights violations, and access to remedies and justice.

In order to ensure these rights, the government must follow the country's constitution, declare its commitment to ILO conventions and fundamental principles and rights, reform the current labour law or enact additional laws, and implement the Commission's recommendations by adhering to the appropriate tripartite system, in line with decent work standards, human rights, and international accountability related to business.

1.2 Ensuring dignified and sector-wise wages: In order to guarantee workers and their families the right to a suitable wage for leading a dignified life, a minimum standard of wages needs to be determined, and a national minimum wage must be declared. At the same time, it is important to improve the wage-determining system, enhance the capacity of the board, and establish a permanent wage commission for structural reform.

1.3 Ensuring a safe work environment: It needs to be ensured that workers have a safe and healthy work environment, along with access to legal support. Develop sector- and profession-specific safety plans. Reconsider the standard of compensation for workers who are killed or injured in accidents or due to negligence. At the same time, specify both the standards and the amounts required to ensure dignified compensation.

1.4 Measure to register workers and labour force and developing database: Steps need to be taken to arrange state recognition of workers, issue identity cards, and register them in order to ensure professional and legal protection as well as social security for all workers, including those engaged in the informal sector and self-employment. To this end, the government must urgently take measure to register labour force and establish a database.

1.5 Right to organisation and bargaining: Implementation of the constitutional guarantee of the state—the right to organise and the freedom of speech. The rights to organisation should be expanded by relaxing the conditions for forming trade unions. A participatory, transparent, and accountable structure needs to be ensured for bargaining.

1.6 Ensuring accountability, transparency, and the right to information: In order to strengthen the capacity and coordination of the Ministry of Labour and Employment and its subordinate departments (including the Labour Department, the Department of Factory and Establishment Inspection, Labour Welfare Centre, Labour-Industry Relationship Institution (IRI), NASTRY, and the National Skill Development Authority), and to ensure accountability of government and non-government organisations, promote democratic practices, enhance transparency, and establish the right to information, necessary state-led reforms need to be carried out.

1.7 Establishment of a permanent labour commission: For ensuring an accountable labour administration system, a permanent labour commission needs to be established as a constitutional body. As the first step of establishing the permanent labour commission, it is necessary for the Ministry of Labour and Employment to take immediate initiative to form a 'national level social dialogue forum'.

1.8 Initiative to enhance skills and employment: The state should take effective initiatives to prevent prevailing unemployment in the country and to expand employment opportunities both at home and abroad. At the same time, it is important to formulate short-, medium-, and long-term roadmaps to address the challenges of automation and the Fourth Industrial Revolution, and to build skilled human resources capable of utilizing the opportunities created by these changes. To this end, special emphasis should be placed on the appropriate use of labour, and on establishing a productive youth labour force and promoting entrepreneurship.

1.9 Ensuring social security: Initiatives must be taken to guarantee all workers the right to access universal social security (covering workplace accidents, death, inability to work, retirement due to illness, maternity benefits, or any other adverse situation). Workers should be included in appropriate social safety schemes based on the nature of their problems. To this end, it would be appropriate to revive the ILO's lifecycle-based social safety programme and introduce a social insurance system.

1.10 Ensuring equal rights and the elimination of discrimination: The state must take necessary action to ensure equal rights and eliminate discrimination in all labour sectors based on gender, race, religion, color, or ethnicity, particularly in relation to wages, trade union participation, and decision-making processes. Additionally, the safety and employment of indigenous and multiethnic workers from both hill and plain regions must be guaranteed.

1.11 Prevention of all forms of harassment, including sexual harassment: The state must take special measures to ensure the right to protection from all forms of harassment, including sexual harassment. Policies against sexual oppression and harassment must be formulated in all factories

and establishments in accordance with the directive of the High Court delivered in 2009. At the same time, complaint cells and resolution committees must be urgently established. In this regard, ILO Convention 190 should be followed.

1.12 Universal protection during the maternity period: The state must take the initiative to provide six months of paid maternity leave for all women workers. To this end, the government must extend its support alongside relevant entities, and special schemes must be introduced for workers in the informal sector.

1.13 The elimination of child and adolescent labour, the abolition of forced labour, and the assurance of security: The government must take appropriate measures to stop child and adolescent labour and forced labour. Effective actions should be implemented to eliminate all forms of bonded labour, including the practice of providing advance payments.

1.14 Well-coordinated industrial relations and the practice of social dialogue: To ensure a well-coordinated work environment, it is important to promote responsible behavior by all parties, including workers and employers, and to establish effective structures for dialogue.

1.15 Proper labour court, justice and arrangement for alternative dispute resolution: The number of labour court must be increased to ensure justice for workers, and the government must take initiative to resolve the cases promptly and to stop unnecessary harassment. Appropriate system and structure must be ensured in preventing the violation of right to justice. The lodging of criminal cases and abuse of power must be stopped during the dispute resolution and when an activity is initiated to gain lawful obtainable. The criminal cases filed against members of various trade union and workers in allegation of participating in labour movement should be repealed after quick review.

1.16 Dignified and harassment-free work environment and use of Bangla language in the court: To establish a culture of dignified work environments, derogatory and disrespectful language targeting specific classes, genders, colors, or ethnicities must be eliminated. In the labour law, the term “Nari” should be used in place of “Mohila.” The practice of addressing colleagues with tui-tumi based on class hierarchies in the workplace must be discontinued. Bangla should be used in labour courts, from the Labour Appeal Tribunal to the High Court, and even in the Appellate Division.

1.17 Ensuring female and male workers’ participation in decision-making and representation: It is important to ensure the participation of both female and male workers, along with their representatives, in formulating and implementing various national plans, including labour-related policies, the annual budget, and the achievement of the Sustainable Development Goals (SDGs) - 2030. The Government must also formulate policies to ensure the representation of labour unions in all representational forums, including the National Parliament.

1.18 Establishing emergency funds and ensuring transparency of existing funds: An urgent emergency government fund must be established to maintain production and pay workers’ wages

and other entitlements during national and international crises, natural disasters, epidemics, or sudden business disruptions. In addition, the transparency and accountability of the Labour Welfare Foundation and central funds must be ensured.

1.19 Protection of labour history and historical places and construction of monument: Initiative must be taken by the state to protect labour history and historical places and to build monument and museum. The dignity of labour, their safety and workers' biography must be presented in a dignified manner in textbook, syllabus, educational courses and media.

1.20 Recognition of martyrs, rehabilitation, treatment and justice: The state must recognize all workers killed during the 2024 uprising and in the labour movement as martyrs. In addition, state policies must be formulated to provide appropriate compensation to workers killed in accidents in the labour sector or due to negligence, as well as to arrange rehabilitation for injured workers. At the same time, those responsible must be tried under a speedy trial process and punished in cases of significant workplace accidents, including Rana Plaza, Tazreen Garments, and Hasem Food.

1.21 Sustainable industrialisation, productivity and inclusive development: It is important for the authority to formulate a comprehensive and well-thought-out plan of action and to encourage the establishment of social businesses for the expansion of national industries, industrialisation, and the development of labour-intensive industries. To this end, a task force must be formed, and coordination mechanisms must be established between industry and the skill development authority, educational institutions, and relevant national and international agencies and organisations.

1.22 Ensuring civic facilities in industrial and labour-intensive areas: Civic facilities and services must be ensured for workers and their families in industrial areas. It is important to make sure that these facilities (education, healthcare, health insurance, participation in services, development of roadways, the supply of gas, electricity and water and other kinds services) are provided for the workers, so that Bangladesh can play role in the establishment of a welfare state and social justice.

1.23 Creation of work environment considering the climate change and global warming: The government must take initiative to establish work environment considering the climate change and global warming. We have to be mindful about our country's reality and in carrying out our international responsibilities.

1.24 Ensuring the security and rights of the migrant workers: The state must take measures to ensure the welfare of all the migrant workers and to strengthen the migration management. To this end, the recognition, trade union and representation rights of migrant workers must be ensured. At the same time, the national and international relations be strengthened.

1.25 Research and survey on labour topics: A separate division must be established by the state to carry out labour force surveys, research on labour and operate educational activities.

1. Introduction

1.1 Background

The fundamental principle governing the state of Bangladesh is the freedom of hardworking labourers from all kinds of oppression. The main goal of the state is to establish a society where the rule of law, fundamental human rights, and political, economic, and social equality, freedom, and justice are ensured for all citizens. To safeguard labour rights and well-being, the Interim Government formed the Labour Reform Commission on 18 November 2024 to undertake necessary reforms. Inspired by Bangladesh's future potential and the aspirations of the July uprising, the Labour Reform Commission has worked with a firm commitment to develop a proposal that provides a democratic direction toward establishing a dignified labour environment.

This report by the Commission, titled "**Transforming the World of Work: A Visionary Roadmap**," is presented with the aim of realizing the collective aspiration to overcome the persistent dishonour, deprivation, discrimination, and long-standing neglect of the labour class, while also harnessing the immense opportunities and potential for developing Bangladesh through sustainable industrialisation with the active participation of its vast labour force.

Bangladesh is a land of seventy-five million workers. The economy of the country is mainly labour-based. There is huge potential for establishing processed agricultural product–based industries in this agricultural country. Alongside the production sector, the migrant labour sector is also a promising area for Bangladesh. To develop qualified and skilled human resources for national and international markets, it is essential to utilize the immense potential of the labour and industrial sectors, play a solid role in safeguarding workers' lawful rights and interests, and formulate policies and plans conducive to the expansion of industries. The right direction will be to proceed with advanced thinking based on the demands, opportunities, and potential of the Fourth Industrial Revolution while eliminating current constraints.

The Role of working people in Bangladesh's state formation, democratic movements, and rights-based struggles

The history of the emergence of Bangladesh is the history of active participation, sacrifice, and long-standing mass resistance, as well as the realisation of rights by the working-class people irrespective of gender, age, race, religion, language, or profession. The contribution of workers is undeniable in all democratic struggles, including the Language Movement of 1952, the struggle for self-determination in 1966, the mass uprising of 1969, and the glorious War of Independence.

The democratic movements—from the uprising of 1990 to July 2024—have advanced with the participation and sacrifices of workers. Rickshaw pullers, day labourers, shopkeepers, domestic workers, garment and other factory workers, and migrant workers all took part in the uprising of 2024, which left behind the devastated bodies and souls of tens of thousands of relatives of

hundreds of martyrs. This sacrifice has created a platform for establishing new social, cultural, political, and economic rights. The July uprising has presented us with an opportunity to transform the ongoing discrimination against working-class people.

Current Status within the Historical Transformation of Bangladesh's Labour Landscape

The state has not yet been able to ensure legal protection for all workers in the country. Eighty-five percent of workers, engaged in the informal sector, remain outside the purview of the law. There is still no national minimum wage in Bangladesh. Moreover, there is no wage standard for the 85% of workers excluded from labour law coverage. Low wages and wage discrimination have intensified income inequality. Due to outsourcing in place of permanent employment, opportunities for marginalized workers to enter government jobs have diminished. Universal social safety programs are scarce. Workers lack adequate or specialized healthcare and hospitals, and there are no insurance arrangements for those injured or killed at work. There is also almost no state-provided support for workers after retirement. The absence of universal maternity protection forces many skilled and promising female workers to drop out of the labour force. With the introduction of automation in various sectors, risks of reduced employment opportunities have emerged. Climate change is creating new crises in the lives of agricultural and other workers. A nationwide network of app-based labour services, such as food and goods delivery, has developed without any legal recognition or protection mechanisms. Target-based work in the app-based service sector has increased uncertainty in the lives of gig workers. It has therefore become critically important to address the existing challenges of the labour sector and to create employment opportunities for the capable workforce with fair and appropriate wages.

The dream of a future Bangladesh, as envisioned for the nation, prioritizes the state's current efforts to generate massive employment by creating an investment-friendly environment and by advancing from a least developed country. In all of this, it is essential to ensure workers' skill development, active participation, and proper safeguarding. It is important to free the labour sector from frustration and make it productive through necessary reforms, such as ensuring wages sufficient for a decent living, guaranteeing a dignified and safe work environment, protecting against workplace accidents, securing proper compensation, safeguarding female workers from all kinds of harassment, protecting against hazardous labour both at home and abroad, and ensuring access to justice in cases of rights violations. There have been countless instances where legitimate workers' movements were suppressed by branding them as 'illegitimate' through labour-unfriendly laws and extra-legal strategies. It is crucial to move away from such practices. Workers' movements for rights are not obstacles to industrialisation; rather, workers' unions, trade unions, and the promotion of collective bargaining contribute to the development of sound industrial relations. Although migrant workers—one of the country's major sources of foreign currency—are praised as 'remittance warriors,' the state's initiatives are still inadequate to protect them from exploitative, low-wage, and dangerous jobs. Ensuring the representation and participation of the

working class in state policy formulation would help eliminate many obstacles to the country's progress.

Dignity for workers in the fields of education and culture must be given due importance. It is essential to remove the barriers that prevent children of the working and middle classes from accessing education within the policy framework of education and skill development, as well as in acquiring appropriate skills for work and profession. The negative perception of vocational and polytechnic education needs to change. It is also important to reform all education systems that perpetuate discrimination. There is a need for an education system that promotes respect and dignity for labour and labourers.

Workplace accidents, compensation and accountability

Workplace accidents need to be covered by insurance; however, access to compensation is inadequate and not available in all workplaces. Accountability in the labour sector is unequal. The pressure for accountability that exists in the ready-made garment industry is absent in other industries. There are massive constraints on enhancing the capacity and accountability of government departments in ensuring workplace safety. In addition, regulations issued by different entities often conflict with one another. Although agriculture, non-agriculture, and other types of informal labour sectors are mentioned in the labour policy of Bangladesh, no law has been enacted in this regard. Furthermore, occupational health and worker protection have not been adequately addressed in the health policy of Bangladesh.

Constitution of Bangladesh and international pledges: Labour policy, law, plan and implementation structure

The national labour policy, laws, and plans have been formulated in light of the Constitution of the People's Republic of Bangladesh, which sets out the fundamental principles of governance of the state. As a member state of the United Nations, Bangladesh is bound by its pledges to formulate relevant policies, enact laws, and remain accountable for initiatives related to international labour and human rights conventions signed and ratified by the country. To safeguard workers' rights, it is important to regularly review and update the laws as well as their institutional implementation structures. It is also essential to enact effective legislation and establish accountable institutions to develop a suitable, skilled, and capable labour force that can meet the challenges of the Fourth Industrial Revolution.

The existing inequality in the labour sector is not only a result of the lack of an effective legal system, but 'political will' of policymakers is required to bring about positive changes. It is desirable that all members of the labour class be protected by the labour law. However, the Bangladesh Labour Law, 2006 is not applicable to all workers. A large share of workers has remained outside the purview of the law. The EPZ Labour Law, 2019 has been enacted for workers

in the EPZ, and the existence of two separate laws within one country has created discrimination in the labour sector.

Constitutional Commitment to the Emancipation of Working People

Even after five decades of independence, the state has not fulfilled the fundamental demand for employment opportunities for all citizens in line with its constitutional pledges. Nor has it ensured a suitable wage that would allow those engaged in self-employment to live a decent life. Local employment opportunities have not expanded through the establishment of industries based on agricultural products, and farmers have not been adequately supported with capital or technical assistance for crop production. Compensation for production losses caused by natural disasters, as well as the fulfillment of the fundamental needs of agricultural workers and marginal farmers, has not been initiated. Furthermore, there is a lack of planning for the effective utilisation of surplus agricultural labour. Although there are pledges to ensure free and compulsory education for all and to create a skilled citizenry, the growth and development of workers and their children are hampered by an unequal education system.

Disruption in industrial relations and decline of democracy as a result of political influence on labour sector

Following Bangladesh's independence, the diminishing role of workers in policy and law formulation, coupled with the rising dominance of power-centric businesspeople and large industrialists within political parties, has shaped the culture of national politics. As a result, the state has drifted away from its founding pledges and proposals. Instead of ensuring political, economic, and social equality, there has been a continuous negative impact on workers' rights, dignity, and status, which has also affected the industrial sector.

The Labour Reform Commission's recommendations are intended to shape the future of Bangladesh. They represent a rights-based transformation of the labour sector, aimed at building a just society where workers are not forced to live under neglect or at the mercy of others, instead can live with rights and dignity. This transformation is not only about ensuring workers' rights but also about establishing the foundations of a fair and equitable society in Bangladesh.

1.2 The Objectives and the Scope of Work of the Commission

The Labour Reform Commission has prioritized the following topics to establish well-coordinated industrial relations between employees and organisations, alongside ensuring legal recognition of workers and working-class people, in both the current context and in light of the historical transformation of Bangladesh's labour sector:

- Reform of labour laws to modernize and strengthen worker protections
- Structural reform of labour-related organisations for efficiency and accountability
- Trade union development and promotion of collective representation
- Creation of an enabling environment for assembly, organisation, and collective bargaining
- Development of industrial relations and strengthening the tripartite system
- Workers' access to justice and effective dispute resolution mechanisms
- Employment security and protection of jobs
- Appropriate wages and compensation in line with workers' rights
- Universal social security and welfare programs for all workers
- Development and enforcement of professional health and safety standards
- Protection of migrant workers and their rights
- Elimination of child labour
- Protection of adolescent workers**,** including both boys and girls
- Safeguarding the rights of marginalized and disadvantaged workers, such as:
    - Female workers
    - Rural workers
    - Domestic workers
    - Farm-based workers
    - Indigenous workers
    - Workers with disabilities

This prioritisation reflects the Commission's commitment to ensuring **equitable, safe, and dignified working conditions** for all segments of the workforce.

The Labour Reform Commission, in formulating its recommendations, has reviewed the following documents and materials:

- The Constitution of Bangladesh
- National laws and policies
- International laws, declarations, and policies
- International documents on human rights, the environment, migration, and business
- The Sustainable Development Goals (SDGs) 2030
- Topics related to LDC graduation and associated expectations
- Policies and conditions of development partners and buyer countries

In addition, the Commission has undertaken the following activities:

- Reviewed media reports
- Organised consultations with stakeholders and specialists
- Sought opinions from the general public across the country
- Held consultations with government and non-government organisations
- Engaged with various national and international development agencies, including the **International Labour Organisation (ILO)**

The Commission's recommendations have been formulated to ensure the **rights and dignified lives of all workers** (both formal and informal). They emphasise:

- Provision of decent work and job security for all workers
- Fair wages aligned with workers' rights and contributions
- Safe and healthy working environments
- Universal social security and welfare benefits
- Right to assemble and engage in collective bargaining
- Access to justice for workers

Additionally, these recommendations aim to:

- Safeguard and promote development
- Strengthen sound industrial relations
- Support sustainable and inclusive economic growth
- Contribute to the establishment of a discrimination-free and just society
- Build a dignified Bangladesh

The Commission has formulated recommendation considering the above-mentioned objectives and reviewing the following topics:

1. **Review of labour laws and policies:** In formulating its recommendations, the Commission has reviewed all the existing labour policies, laws, rules and relevant documents of which the following are worthwhile to mention: The Bangladesh Labour Act, 2006, The EPZ Labour Act 2019, The Labour Policy 2012, The National Occupational Health Safety Policy 2013, The Domestic Workers Protection and Welfare Policy 2015, The National Child Labour Elimination Policy 2010 and The Labour Welfare Foundation Law 2006;
2. **Reformation of implementation process:** In order to ensure workers' rights, the implementation of relevant laws and policies, as well as the reform and development of responsible organisations such as The Department of Labour and The Department of Inspection for Factories and Establishments, are essential;
3. **Development of trade union, industrial relations and tripartite system:** The right to assemble, collective bargaining and receiving representation must be ensured, starting from establishment to national level effective social dialogue and bargaining and improvement of environment for practicing democratic and responsive trade union activities should also be ensured. In order to ensure effective and well-coordinated tripartite system, the existing national, sectoral and establishment level systems like tripartite consultation council – review of the structure of TTC and its scope of work and formulate recommendation. To this end, it is important to identify the lessons learned from the noteworthy industrial disputes from the past;
4. **Receiving justice by workers and dispute resolution:** It is important to ensure Justice for all workers, resolve dissatisfaction, the process of resolution of industrial disputes such as establishment-based resolution process, alternative dispute resolution, arbitration and mediation and to review the scope of work and procedure of the labour court and other establishments to formulate recommendations;
5. **Employment, job security and skill development:** It is important to formulate necessary recommendations while keeping in account, the technological development across the globe,

production process, change in work and recruitment, the fourth industrial revolution, automation, artificial intelligence, climate change, platform/gig economy, demographic composition, the challenges of employment, existing job security, capacity development training for creating new employment, establishment of labour intensive industries and protection of workers specially, apprentice, outsourcing, master role-based workers, apprentices at service sector and youth workers;

6. **Improve the living standard, wage and fair share of workers:** It is important to formulate recommendations by reviewing the existing wage determination process, standard and the formation of minimum wage board for establishing social justice while ensuring dignified human life for workers and their families, fulfillment of fundamental demands, Sustainable Development Goals – SDG and National Poverty Eradication Target, education, health, child and women development policies and increasing income inequality;
7. **Occupational safety and health :** The existing laws, policies, inspection systems, compensation standards, payment methods, and relevant structures—such as the National Industrial Health and Safety Council, the Establishment-based Safety Committee, and other systems including the Employment Injury Scheme—must be reviewed, and recommendations formulated to ensure a safe and healthy work environment for all, as well as the development of workers' occupational safety and health . To this end, it is important to identify the lessons learned from the noteworthy industrial accidents from the past;
8. **Universal social security and welfare programmes:** In order to ensure social security for all workers, it is important to make recommendations for the development of its scope, processes, and existing schemes, as well as the environment of industrial zones, and the housing, education, and health systems for workers and their families. To this end, it is essential to identify lessons learned and examples from different countries;
9. **Protection of migrant workers:** The existing laws, policies and structures must be reviewed to formulate recommendations to ensure skill development of migration seeking workers, dignified, harassment-free and safe migration, protection abroad, recognition of migrant workers as workers, legal protection, right to assemble, bargaining and be represented, protection of migrant workers' families during the period abroad and social and economic rehabilitation of repatriated workers;
10. **Protection of female workers' rights:** Emphasis has been laid to formulate recommendations to ensure a dignified, discrimination-free, and harassment-free work environment for female workers, to provide all necessary facilities including protection during maternity, and to create suitable employment opportunities for women, particularly those in rural areas;
11. **Elimination of child labour and protection of working adolescent boys and girls:** In order to eliminate child labour and safeguard children from hazardous works, Bangladesh Government's policies, plans of action and programmes need to be reviewed to formulate recommendations;
12. **Protection of agricultural, rural, farm-based and seasonal workers:** Recommendations have been formulatd to ensure the legal recognition and protection of agricultural workers,

rural workers, farm-based and seasonal workers; to safeguard them during periods of unemployment and natural disasters; to develop their skills; to ensure social security; and to uphold their right to assemble and be represented;

13. **Protection of indigenous and multiethnic community workers:** Recommendations have been formulated to ensure suitable employment, non-discrimination, dignified and social inclusion for indigenous and multiethnic community workers;
14. **Protection of home-based and domestic workers:** Recommendations have been formulated to ensure legal recognition of home-based and domestic workers, safeguard them from torture and ensure their social security and well-being;
15. **Protection of disable and disadvantaged working community:** Recommendations have been formulated to make special arrangements for creating employment opportunities for disabled workers, establish disability-friendly workplaces, and ensure dignity, protection, non-discrimination, and social inclusion for socially disadvantaged working communities;
16. **Protection of workers' rights in the context of shutting down of state-owned industries/denationalisation:** Recommendations have been formulated reviewing the employment opportunities and workers' rights situation in the context of shutting down of state-owned industries/denationalisation; and
17. **Establish supply chain:** Recommendations have been formulated to ensure accountability of the relevant companies in ensuring rights and protection in line with international policies and declarations of all workers related/affiliated to multi-national and national companies through supply chain.

1.3 Working Methodology, Technical Committee Profile and stakeholder Mapping:

The Commission has primarily followed specific procedures to carry out its activities. In this connection, national and international laws, policies, documents, and relevant research reports and recommendations have been reviewed. Additionally, various case studies and media reports have been analysed. To gather stakeholders' opinions, consultations have been held with workers' trade unions, owners' associations, and other relevant parties at the field, regional, and national levels. Consultations have also been held with different government agencies and national and international development organisations, including the ILO. In addition, advice has been sought from professionals and organisations experienced in relevant topics. To gather public opinion, online forms, email, and written submissions have been used.

The Commission has formed multiple technical committees (see Annexure 1.3.1) to formulate relevant recommendations by analysing the labour situation. The committees include: law and policy structure; labour-related establishments and governance; resolution of labour discontent and complaints; industrial relations and social dialogue; and social protection and workers' welfare. Eight additional committees have carried out subject-specific reviews and formulated recommendations. These committees have worked on the following areas: right to work and inclusion; wages and fair share; safe work environment; social security; right to assemble and collective bargaining; industrial disputes and justice; non-discrimination and special communities; and child and adolescent labour and forced labour.

The participation of stakeholders in this task of the Commission has played a pivotal role. The Commission has held 36 consultations with workers' organisations, eight with owners' association at district level, six with labour related government departments and 18 with professional communities at different districts including Dhaka. The Commission has also held seven consultations with international donor agencies, development partners and brand buyers and six with labour related experts. The list of participating organisations is provided in annexure 1.3.2. Additionally, different individuals and organisations submitted 202 demands and written opinions, which have played the role of an important basis for the Commission to formulate recommendations. The list of individuals and organisations that provided demands and written opinions is presented in annexure 1.3.3.

1.4 Overview of Report Sections

The second chapter of this report provides a structural outlook on labour reform. It presents the acceptable basis for reform, policy directives, and the subjects considered in formulating recommendations. A topic-wise structure has been developed in this chapter, through which the main framework of labour reform has been determined. The current situation of the labour sector is analysed by examining workers' rights, related challenges, and potential opportunities. Based

on stakeholders' opinions and demands, the scope of reform has been identified, and proposals have been presented by topic, by labour-sector establishment, by labour community, and by sector.

In the final chapter, special proposals on the labour force survey, labour-related research and education, budgeting, and preparation of a white paper are presented.

2 Structure of Labour Reform Proposal

2.1 Basis of Reform Structure

Recognised Human Rights and Labour Standard

Constitution, laws and policies of Bangladesh: The Constitution of People's Republic of Bangladesh is the fundamental basis/tools to ensure worker's rights and well-being of workers and their families. The Constitution is committed to ensure every citizen's right to work, exploitation-free and standard living and thereby establish a just society by eliminating discrimination.

Article 14 and 15: It is clearly declared in article 14 of the Constitution of Bangladesh that, "It shall be a fundamental responsibility of the State to emancipate the toiling masses the peasants and workers and backward sections of the people from all forms of exploitation." Article 15 of the Constitution of Bangladesh is specifically related to the fulfillment of fundamental needs. According to this article "It shall be a fundamental responsibility of the State to attain, through planned economic growth, a constant increase of productive forces and a steady improvement in the material and cultural standard of living of the people, with a view to securing to its citizens –

(a) the provision of the basic necessities of life, including food, clothing, shelter, education and medical care;

(b) the right to work, that is the right to guaranteed employment at a reasonable wage having regard to the quantity and quality of work;

(c) the right to reasonable rest, recreation and leisure; and

(d) the right to social security, that is to say, to public assistance in cases of undeserved want arising from unemployment, illness or disablement, or suffered by widows or orphans or in old age, or in other such cases.''

Article 19: According to this article the state's commitment in terms of equality of opportunity are '(1) The State shall endeavour to ensure equality of opportunity to all citizens. (2) The State shall adopt effective measures to remove social and economic inequality between man and man and to ensure the equitable distribution of wealth among citizens, and of opportunities in order to attain a uniform level of economic development throughout the Republic. (3)The State Shall endeavour to ensure equality of opportunity and participation of women in all spheres of national life.'

Article 20: Work as a right and duty – (1) Work is a right, a duty and a matter of honour for every citizen who is capable of working, and everyone shall be paid for his work on the basis of the principle "from each according to his abilities, to each according to his work". (2) The State shall endeavour to create conditions in which, as a general principle, persons shall not be able to enjoy unearned incomes, and in which human labour in every form, intellectual and physical, shall become a fuller expression of creative endeavour and of the human personality.

Article 34: Prohibition of forced labour – (1) All forms of forced labour are prohibited and any contravention of this provision shall be an offence punishable in accordance with law. (2) Nothing in this article shall apply to compulsory labour–

(a) by persons undergoing lawful punishment for a criminal offence; or

(b) required by any law for public purposes.

Article 37: Freedom of assembly – Every citizen shall have the right to assemble and to participate in public meetings and processions peacefully and without arms, subject to any reasonable restrictions imposed by law in the interests of public order or public health.

Article 38: Freedom of association – Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order :

Provided that no person shall have the right to form, or be a member of the said association or union, if-

(a) it is formed for the purposes of destroying the religious, social and communal harmony among the citizens;

(b) it is formed for the purposes of creating discrimination among the citizens, on the ground of religion, race, caste, sex, place of birth or language;

(c) it is formed for the purposes of organizing terrorist acts or militant activities against the State or the citizens or any other country;

(d) its formation and objects are inconsistent with the Constitution.

Article 40: Freedom of profession or occupation – Subject to any restrictions imposed by law, every citizen possessing such qualifications, if any, as may be prescribed by law in relation to his profession, occupation, trade or business shall have the right to enter upon any lawful profession or occupation, and to conduct any lawful trade or business.

Laws: Bangladesh Labour Act, 2006; Overseas Employment and Migrants Act, 2013; Bangladesh Labour Rules, 2015; Bangladesh EPZ Labour Act, 2019.

National policies: Child Labour Elimination Policies 2011, National Women Development Policy 2011; National Child Policy 2011; National Labour Policy 2012; National Occupational safety and health Policies 2013; Old Age Welfare Policy 2013; Domestic Workers Protection and Welfare Policies 2015; Expatriate Welfare and Overseas Employment Policy 2016; National Youth Policy 2017; National Skills Development Policies 2020; National Employment Policy 2022; National Industrial Policy 2022.

Responsibility as a member of different United Nations Agencies including International Labour Organisation and different other international organisations

Ratified ILO Convention and other international laws, declaration and instruments: Bangladesh, as a member state of the United Nations, is committed to upholding international human rights and workers' rights. It is also a signatory to and has ratified numerous international conventions, treaties, and protocols. Bangladesh has ratified 13 of the 18 major human rights–related treaties and protocols declared by the United Nations, which reflects the country's strong commitment to human rights and international standards.

These treaties include – The Universal Declaration of Human Rights (1948); The International Covenant on Economic, Social and Cultural Rights (1966); The International Covenant on Civil and Political Rights (1966); The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979); The International Convention on the Elimination of All Forms of Racial Discrimination; and The Convention against Torture (CAT), The International Convention for the Protection of All Persons from Enforced Disappearance (ICPPED), The International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families (ICRMW), and The UN Convention on the Rights of Persons with Disabilities (CRPD).

Additionally, Bangladesh has ratified 35 out of 190 international conventions of the United Nations and many of these are documents directly related to human rights, labour protection and social justice. Bangladesh, as a member state of International Labour Organisation (ILO), is committed towards the four policies mentioned in the Fundamental Principles and Rights at Work: 1. Freedom of association and right to collective bargaining; 2. Abolition of forced labour; 3. Abolition of child labour; 4. Eliminating discrimination in the workplace. These principles form the basis of international labour laws and serve as one of the key directives for structural labour-policy reform in Bangladesh.

Documents related to human rights, the environment and business: The United Nations Guiding Principles on Business and Human Rights (UNGPs) form one of the main components of the modern framework integrating international labour, human rights, and business principles. They establish a structure for protecting human rights by distributing responsibilities among corporate bodies and civil society. Human Rights Due Diligence (HRDD) is an important approach that provides guidance for identifying human rights violations in business initiatives and ensuring their prevention and redress. These documents are highly relevant to the labour market in Bangladesh, as they set international standards for safeguarding the rights of workers in the global supply chain and recognize the ethical and legal obligations of multinational companies.

Sustainable Development Goals (SDG 20230): The Sustainable Development Goals (SDGs) are a universal plan of action for eradicating global poverty and achieving human dignity, equality, and sustainable economic growth. Goal 8 of the SDGs, "Decent Work and Economic Growth," is directly related to workers, expressing a commitment to ensuring the protection of work, fair

wages, decent working environments, and social security. In addition, Goal 5 (Gender Equality), Goal 10 (Reduced Inequalities), and Goal 16 (Peace, Justice and Strong Institutions) are closely connected to the establishment of workers' rights.

Issues to follow in the graduation from LDC: In the process of Bangladesh graduating from Least Developed Country (LDC) status, it is important to enhance its capacity to compete, strengthen the social security system, and comply with international labour standards. Bangladesh may lose various exemptions after graduation. In that situation, protecting labour rights and ensuring ethical production practices will be key to maintaining competitiveness in the international market. A decent working environment, the right to form trade unions, workplace safety, fair wages, and opportunities for training are considered essential elements.

Government's labour related treaties and pledges: The government has participated in multiple treaties and action plans related to labour principles at the international arena. The most important among these are the National Action Plan on Business and Human Rights, the Decent Work Country Programme (DWCP), and the ILO Road Map on Labour Rights. These documents provide a coordinated approach to ensuring workers' rights, participation, security, and welfare.

2.2 Reform Principles:

The principles followed by the Labour Reform Commission in formulating its recommendations are not merely a theoretical framework; rather, they are regarded as formal guidance for the future of labour policy in Bangladesh. A logical explanation of each principle is provided below.

Recognition of dignity of labour and rights: Showing dignity to labour at all levels of society and ensuring workers' fundamental rights and necessary protections is a human and ethical responsibility. The objective of this principle is to establish work not only as a means of earning income but also as a dignified social role, which makes workers' places respectable within society.

Universality, non-discrimination and social justice: The central point of this principle is to ensure equal treatment of workers regardless of religion, ethnicity, gender, birthplace, or any other difference, and to establish social justice. This principle is helpful in building an inclusive society, where it is possible to improve the living standards of working-class communities.

Inclusiveness and fair share: Recognising workers' contribution properly to economic growth and the principle of distribution of its results equally among the working-class people forms the basis of this partnership. This promotes workers' motivation to work, productivity and sense of responsibility.

Well-coordinated industrial relations, representation and participation: Ensuring every worker's right to association and representation, and effective participation in the policy-making process is a precondition for a democratic labour environment. The balance of industrial relations can be maintained through the tripartite structure of worker–employer–government.

Justice: The effective redress of violations of the rights of formal, informal, and self-employed workers, and the assurance of justice, are pillars of a just society. This protects workers' trust and confidence in the state, and social peace.

2.3 Issues Considered to Formulate Recommendations

The issues have been selected based on various contexts for the Reform Commission of Bangladesh to formulate recommendations. The existing labour condition and workers' rights situation, workers' living standards, conditions of employment, trends in socio-cultural changes, and the aspirations and expectations of the masses are considered among the main issues. At the same time, technological changes in the labour sector and the future demands of the country's labour market have also been given importance in formulating the Commission's recommendations. In addition, the Commission has placed special emphasis on developing a sustainable business environment, upholding the country's image, and further enhancing its position in the international arena.

Current Status of Labour Rights

Standards and deficits of decent workplace: A decent workplace refers to an environment where workers' safety, protection, and fundamental rights are ensured. The concept of decent work, introduced in 1999, is recognized as one of the fundamental rights of workers. The right to decent work has been considered important in both national and international development agendas. One of the goals of the United Nations Sustainable Development Goals (SDGs) is Decent Work. There are a total of 10 indicators of decent work, which include: Employment Opportunities; Adequate Income and Productive Work; Decent Working Time; Work–Family–Personal Life Balance; Work Worthy of Abolition; Stability and Security of Work; Equal Opportunity and Treatment at the Workplace; Safe Work Environment; Social Security; and Social Dialogue and Representation of Workers and Employers. The Reform Commission has taken into consideration the decent work situation in Bangladesh, as well as existing problems and deficits, in order to ensure suitable workplaces for workers.

Inequality, unemployment, risk and barriers: Various forms of inequality exist in the labour market of Bangladesh. These inequalities are evident in areas such as recognition and opportunities for work, rights, wages, the formation of associations, social security, and more. Additionally, there are high levels of unemployment as well as risks and challenges in the labour market. Youth unemployment is particularly severe. In particular, the high rate of unemployment among highly educated youth is a major concern. Moreover, sudden loss of work, workplace accidents, and wage uncertainty have negatively affected the labour market and industrial relations in the country. Under these circumstances, the Commission has placed special importance on eradicating inequalities among workers, increasing employment opportunities, and addressing associated risks.

Workplace diversity and Industrial transformation: The increasing diversity of Bangladesh's labour sector over the past decades is particularly noteworthy. The diversity of workers, occupations, and types of work in the labour market is increasing day by day. While the labour market was once mainly dependent on agriculture, it now includes a growing presence of workers in sectors such as garments, IT, services, construction, freelancing, and ride-sharing. The participation of female workers alongside male workers has also increased significantly and is expected to grow further in the coming days. This evolution and diversification, on the one hand, have created new opportunities, but at the same time, they have also posed new challenges in ensuring the rights and welfare of workers and these are the issues that have been addressed in the Commission's recommendations.

Industrial relations, Workers' discontent and Industrial disputes: Labour discontent and industrial disputes are barriers to sound industrial relations that cause losses for both workers and employers and, in turn, also harm the country's economy, productivity, and sustainable development. In Bangladesh, labour discontent arises over demands related to workers' wages, benefits, working conditions, and other rights. This not only hinders industrial productivity but also damages workers' livelihoods, sustainable businesses, and the country's image. In this context, the Commission has formulated recommendations addressing issues related to the establishment of sound industrial relations, sustainable business, and the resolution of labour discontent and industrial disputes for stable development.

Fourth Industrial Revolution, technological development: A massive change is emerging in sectors such as technological development, robotics, and artificial intelligence (AI) as a result of the Fourth Industrial Revolution. This change has affected the nature of work and the employment across the industries. The lives, livelihoods, and standard of living of those engaged in the garment, agriculture, furniture, and leather industries have been significantly influenced by technological advances in these fields. In response, the Commission has formulated recommendations taking into account future technological developments, shifts in the nature of work, and potential changes in workers' livelihoods and living standards.

Fundamental rights and needs of workers and their families:
Since the main objective of this Reform Commission is to ensure workers' welfare and protect their rights, it has taken into consideration the fundamental rights and needs of workers and their families in formulating its recommendations. The essential needs of workers and their families such as food, clothing, health, security, and entertainment as well as their social and economic rights have been taken into account to ensure a well-coordinated system of protection for workers' families.

Mass-aspirations, demands and expectations of the working-class
The recent political changes have created a social aspiration for a society free from inequality and exploitation. Since the working class has made significant contributions to this process of change, a new aspiration has emerged among them. Moreover, the working class in this country has

historically raised various demands for their rights and welfare. The Commission has formulated its recommendations by emphasising the mass aspirations that have evolved under the changing circumstances, as well as the expectations of the working class for the achievement of their legitimate rights.

Enhancing International Business Reputation and Accountability

Bangladesh is now integrated into the global supply chain, and the scope and significance of this integration are gradually increasing. This development has particularly affected the employment, rights, and living standards of the working class in Bangladesh. Therefore, it is important to promote the reputation of Bangladesh's industrial sector and businesses at the global level and ensure advanced competitiveness of business. Additionally, it is important to safeguard workers' rights and maintain ethical responsibility and accountability in business, which are essential for the overall development of the country The Commission has taken all these issues into consideration while formulating its recommendations.

Historical, social and cultural evolution

The Commission has particularly emphasised in formulating its recommendations the cultural changes in the labour and employment sector and the trend of changes in social values. The recommendations have been formulated keeping in mind the historical and social evolution in different sectors including attitude towards work, value and recognition of work, change in attitude towards women's labour and work and its economic and social value.

2.4 Issue-based Structure of Reform Proposal

Recognition, rights, opportunities, skills and employment security: The recognition of workers' work, job security, appointment letter and service book, outsourcing, creation of employment opportunities, skill development, registration of workers/workforce and national labour databased, apprentice and training programmes (NEET for youth) and STEM education and employment opportunities, gig and rights of platform workers.

Wage and fair share: National minimum wage, sector-based wage, wage standard and living wage, wage structure, wage payment system, wage increment rate, liability to pay wage, wage inequality, mandatory emergency fund, workers' involvement in company profit.



Safe and healthy work environment: One of the main objectives of the Labour Reform is to create safe and healthy work environment for all workers. To this end, the issues need to be considered include workplace accidents, occupational illness, occupational safety and health policies, grievance mechanism, compensation and rehabilitation; occupational safety and health education, training and research; storage of information, monitoring and evaluation; occupational safety and health related professions and project for vulnerable community.

Social security, protection and welfare: Universal pension, provident fund, gratuity, rationing, Labour welfare foundation, central fund, protection during unemployment, compensation for accident, protection during maternity, day-care, education for family members of workers, health and housing; scheme/programme for special worker community, assistance to workers affected by climate change and natural disaster.

Right to association, participation, representation and collective bargaining: This domain encompasses the realisation of the universal right to organise; the streamlining of minimum membership thresholds, application procedures, and online management systems; the prevention of unfair labor practices and anti-trade union discrimination; the determination of collective bargaining agents and the resolution of industrial disputes in both formal and informal sectors; the advancement of female participation and leadership within unions; and the enhancement of tripartite and international worker representation.

Industrial discontent and dispute resolution and justice: Ambiguities and gaps in labor law, dispute resolution, number and capacity of labour courts, independent grievance resolution, alternative dispute resolution.

Equality, non-discrimination and inclusion: Eradication of unequal treatment, universal maternity and paternity leave, elimination of discrimination in salary and promotion, prevention of gender-based violence or harassment in the workplace, development of women-friendly infrastructure, increased representation of women in decision-making, support for work-life balance among female workers, skill development training for women employees, and occupation-based as well as community specific measures of support.

Child labour, adolescent worker and forced labour: Minimum age for employment, standards of work and environment, list of hazardous work, education and vocational skills development for adolescent workers, monitoring and inspection of labour standard, responsibility, accountability and punishment; evaluation of past programmes in developing action plan, responsive business conduct.

2.5 Main Structure of the Proposal

The main reform structure of this Commission is formed with the following five elements:

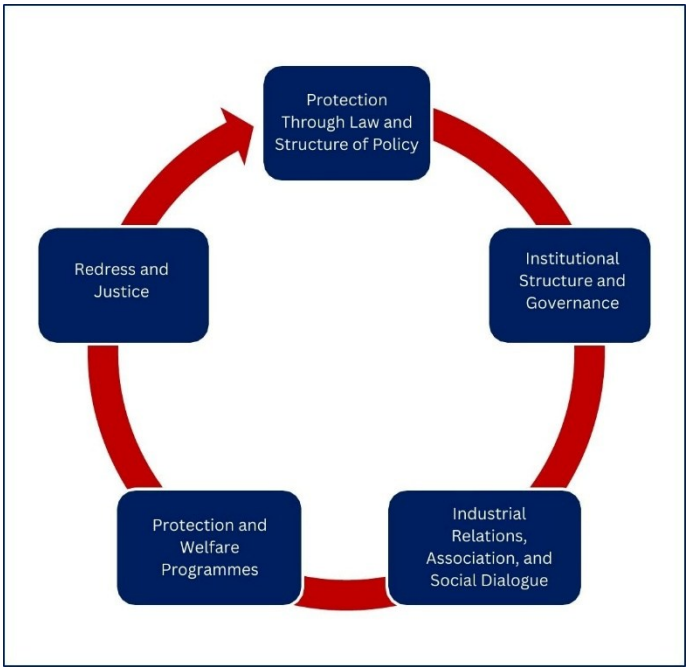
Protection through law and structural policy framework: It is important to have a well-coordinated framework of labour law, labour policy, and other relevant laws and policies to protect workers' rights, establish a safe working environment, and ensure the welfare of workers' families. This will help secure the establishment and enforcement of workers' legitimate rights. In this connection, it will be necessary to implement the existing laws and policies where applicable, particularly in the implementation of the Commission's proposed issue-based recommendations on ensuring workers' rights and labour welfare. In other areas, the Commission's recommendations would be implemented through the amendment and formulation of laws and policies.

Institutional structure and governance: It is important to have a strong institutional framework and governance system for the implementation of labour reform. In this regard, the functions, responsibilities, and mandates of the relevant organisations need to be defined to ensure workers' rights. Transparency, accountability, and the need to enhance the capacity of organisations within the institutional and governance system have been emphasised in the formulation of the Commission's recommendations, which will help ensure the effective implementation of labour reform initiatives. In this connection, the following organisations/institutions have been brought under review:

- Industrial Relations Institution
- Ministry of Labour and Employment
- Centre for Labour Welfare
- Department of Labour
- Department of Inspection of Factories and Establishments

- Labour Court and Appellate Division
- Minimum Wage Board
- Central Fund
- Labour Welfare Foundation
- National Skills Development Authority
- Special Divisions/Institutions of other Ministries Related to Worker Interest.

Industrial relations, freedom of association and social dialogue: The importance of sound industrial relations, the right to association, and social dialogue is immense for ensuring the protection of workers' rights. In Bangladesh, it is important to make associations and social dialogue effective by reviewing the limitations, weaknesses, and deficits that exist in workers' rights to association and social dialogue. Once associations and social dialogue are made effective by addressing these limitations, they will help create sound industrial relations and promote a coordinated and participatory environment essential for ensuring workers' rights.



Protection and welfare programmes: It is essential to ensure the welfare of workers and their families by initiating protection and welfare programmes alongside laws and policies. In particular, workers' welfare should be promoted through welfare schemes and programmes in sectors where laws and policies have limited scope in ensuring protection for workers and their family members. To this end, it is also necessary to make both existing and new schemes/programmes more worker-friendly. The protection and welfare programmes will play an effective role in addressing gaps in legal protection, particularly in the informal sector, outsourcing, home-based work, gig work, ride-sharing, and similar areas. These initiatives will include healthcare, insurance, pensions, maternity leave, and other benefits, taking into account workers' demands and perceived needs. Such programmes will play an important role in ensuring workers' economic and social protection while improving their standard of living.

Access to justice and redress: Ensuring workers' rights, protection, and welfare through reforms in the area of redress and justice. The main objective is to ensure that all workers, both in the formal and informal sectors, receive fair redress and access to justice. In particular, it is important

to develop an effective redress mechanism to swiftly resolve complaints and address problems in order to protect the rights of informal sector workers. To this end, reforms should be introduced in labour courts, alternative dispute resolution mechanisms, the Department of Inspection of Factories and Establishments, the Department of Labour, and the local government system.

3. Issue-Based Fundamental Reform Proposals

3.1 Recognition of Work and Occupation, Right to Work, Opportunity, Skill, Permanence and Assurance

According to the Constitution of Bangladesh, every citizen has the right to work. The responsibility of the State is to fulfill the basic necessities of citizens, which includes the 'right to work' and, under Article 15, the right to guaranteed employment at a reasonable wage. According to Article 20 asserting "Right to work, duty and honour", the state has the obligation to create opportunity for work to every citizen according to his abilities. Subject to any restrictions imposed by law, the guarantee of the "right to enter upon any lawful profession or occupation" (Article 40) ensures the freedom of citizens to participate in employment of their choice. Furthermore, the National Labour Policy 2012 works towards creating a non-discriminatory employment environment through "creating skilled manpower for employment generation" (Objective 4.02) and "creating employment opportunities for marginal people" (Objective 4.02.8).

But there is unemployment in the labour market, particularly a high rate of unemployment among youth and women, reliance on the informal sector, low productivity, lack of protection for the unemployed, and the presence of gender inequality. Although two-thirds of the labour force in Bangladesh are engaged in some form of work, women's participation is lower than men's, and the situation in rural areas is more challenging than in urban areas. The mismatch between education and skills also indicates a high rate of unemployment and an ineffective labour market system.

Employment in the industrial sector of the country's labour market is shrinking, high rate of employment in the agricultural sector and slow growth in the service sector is obvious. Employment in the industrial sector is decreasing because of "Deindustrialisation". In the one hand, almost 85% workers are engaged in informal sectors, which results in a lack of workplace safety and social protection. On the other hand, although rise of gig economy creates new opportunities, it lacks protection and recognition. The employment situation among the youth is alarming. Specially, those who have of higher education degree are not finding jobs. These inequalities clearly highlight the structural problems of the educational system and labour market.

3.1.1 The Applicability of the Labour Law and Recognition of Workers

Although the Labour Act, 2006 contains provisions on employment, worker–employer relations, wages, compensation, trade union formation, industrial dispute resolution, and workplace health and safety, it is applicable mainly to the formal sector. As a result, workers in the informal sector—particularly those who are marginalized—remain deprived of fair wages, a safe working environment, the right to organise, freedom of association, and social protection. It is therefore essential to enact a universal and comprehensive labour law to ensure workers' rights, dignity, and welfare. The fundamental rights of workers must be safeguarded by aligning the labour law with

the Constitution, international standards, and ILO conventions. This will not only promote equity and social protection but also help maintain productivity and human dignity.

The objective of reforming labour law should be to further strengthen workers' rights. Fair wages, a safe working environment, and social protection are not just legal obligations; these are also preconditions for economic stability and social solidarity. A balanced labour law must maintain alignment between labour rights and economic growth.

All workers—engaged in any sector or organisation—should fall under the purview of the law so that they can secure their fundamental rights and protection. To this end, two approaches can be considered: amending the existing law by expanding its scope, or enacting a new comprehensive law. In creating the structure of a new law, it must be ensured that every worker receives the opportunity for fair wages, a safe working environment, and the rights to association and collective bargaining. In particular, real legal protection for informal sector workers must be ensured. As a signatory to international labour treaties and conventions, Bangladesh has the responsibility to implement these commitments.

It is important to define "Worker" and "Employer" concisely when enacting an effective labour law. It may be proposed to use the term "Employer" instead of "Owner." Although organisations are free to determine different designations, any worker who works for wages cannot be excluded from the scope of labour law. Only those who are not engaged in "Administrative" or "Managerial" duties will have the right to organise. They may join a trade union. On the other hand, those employed as "Officers" may form separate associations to protect their rights.

The basic rights and social security of all workers must be ensured irrespective of the nature of their job or sector. The labour law reform whether through amendment, or enactment of new law or introduction of sector wise law, will have the main objective to ensure the equal rights of all workers. However, the previous rights or facilities must in no way be curtailed.

To this end, the Labour Reform Commission is recommending the following:

a) Make the labour law universally applicable, with recognition and protection of workers made more comprehensive.

b) All workers in Bangladesh, irrespective of their employment – whether in industry, specialised labour zones, type of work, formal or informal, profit or non-profit – should fall under the scope of the labour law. To achieve this goal, either undertake a massive reform of the existing law or enact one or more new and comprehensive labour laws.

c) In the comprehensive reform of the labour law, the term "Employer" should replace "Owner". Organisations may determine different designations according to their needs, but no one should remain outside the scope of worker protection due to differences in designation.

d) Expand the definition of the term "Worker" and make the definition of the term "Employer" more specific. The term "Employer" will refer only to the individual who holds the ultimate authority to appoint and terminate employees and determine the terms and conditions of work. All other individuals outside this definition but responsible for administrative and managerial functions will be regarded as officers. The labour law will apply to everyone except the employer, and all such individuals will fall within the scope of the legal rights and protections of the labour law. Where applicable, self-employed individuals will be included as "Workers."

e) Ensure the universal applicability of the labour law and recognition of workers in special zones (EPZ, SEZ). Develop a unified and comprehensive labour law that guarantees equal labour rights for workers both inside and outside the special economic zones. Workers in special zones should fall under the scope of the general labour law so that they receive the same rights and protections as other workers in the country. However, a separate law may be retained for EPZ workers, provided their rights and benefits remain aligned with the general labour law. In particular, EPZ workers' rights to association, collective bargaining, and access to justice and courts must be equivalent to those of other workers. Their rights to trade union membership, collective bargaining, and access to labour inspections should be brought outside the scope of BEPZA and instead carried out through the Department of Labour (DoL) and the Department of Inspection of Factories and Establishments (DIFE).

f) Provide interim provisions for implementing reforms so that new measures can be formulated through tripartite consultations, particularly regarding payment of monetary dues to workers who fall under the expanded definition of "Worker."

3.1.2 Legal protection and assurance of workers' job

The Bangladesh Labour Act, 2006, and the EPZ Labour Act, 2019, establish the terms and conditions of work as well as the minimum standards of the working environment for workers across various sectors. The objective of these laws is to prevent unlawful dismissal and ensure fair treatment. However, workers are often deprived of fairness and protection despite the existence of these provisions. For example, although appointment letters are mandatory, most workers do not receive them, which makes their employment insecure. Additionally, some provisions of the law are harsh on workers. According to article 13, a worker does not receive wages even if they do not take part in an illegal strike. The requirement of producing a medical certificate for sick leave is also a major impediment for workers in poor or remote areas.

According to Articles 16 and 20, eligibility for dismissal or layoff compensation is conditional on working for a certain period, which is discriminatory toward temporary workers. Article 19 requires two years of continuous employment to qualify for death compensation, which is inhumane. Article 23(3) states that compensation shall not be provided in cases of dismissal for misconduct, which is sometimes applied on the basis of unsubstantiated allegations. Under Article 26, the employer may terminate employment without providing any reason, and in such cases, the

worker's scope for redress is extremely limited. This provision may be particularly damaging for union officials, as employers could misuse it to hinder freedom of association and collective bargaining.

In addition to legal limitations, there is a major problem with the lack of implementation of the provisions stipulated in the law. Many employers do not care about the law at all, and workers have to pursue their cases in order to receive legal remedies. Although there is scope for filing complaints and receiving redress in accordance with the provisions of Article 33, this process is often ineffective due to delays and complications. Consequently, workers are discouraged from filing complaints.

An effective, easy, transparent, and quick complaint resolution system is required to address these challenges, as it would provide workers with the opportunity to obtain justice without administrative or financial obstacles. If such a system is not ensured, workers' rights will remain only on paper. Therefore, although the labour law provides a structure, it fails to ensure real protection for workers due to its gaps, loopholes, weak enforcement, and limitations.

The need for amendment of the labour law is identified in this analysis to ensure that workers receive fair and dignified treatment in line with international standards. It must be especially ensured that workers are not deprived of their lawful rights and dues in any dispute resolution system, and that they are not granted fewer benefits than those stipulated in the collective bargaining agreement or any other type of resolution document.

To this end, the Labour Reform Commission is recommending the following to ensure job security for all workers. The law shall provide assurance for workers fair treatment, justice and adequate protection. A number of discrepancies have been identified analysing the existing Bangladesh Labour Act 2006, which are mentioned here. But this analysis is not the final one, the recommendations provided in different parts of this report should be taken into consideration.

Recommendations:

a) Workers from both the formal and informal sectors should be provided with an appointment letter, identity card, or proof of joining will be made mandatory. If a layoff lasts for more than 15 days, the requirement for workers' mandatory attendance at the workplace must be canceled. Measures will also be taken to ensure compensation for workers during the layoff period.
b) The provisions regarding factory closures must be amended to ensure that workers not involved in an illegal strike are not deprived of wages or lay-off compensation. If workers cease work due to non-payment of wages, such action must not be deemed an illegal strike. The law should explicitly clarify that work stoppages resulting from unpaid wages are entirely lawful and that no benefits shall be deducted for such reasons.
c) The unnecessary complication in taking sick leave must be removed, and the law should incorporate the provision that no medical certificate will be required if the sick leave is not more than 02 days.

d) Since the existing system of investigating misconduct is not effective, an effective provision must be included by reviewing the law so that both workers and employers can clarify their position through their representatives, if needed.
e) Like termination of job, the workers must be paid four-month wages in case of discharge due to illness or health related reason, and in case of termination for the permanent shutting down of the establishment workers must be given four-month notice/notice pay.
f) The law must be amended with the provision that the president, general secretary and treasurer of the executive committee of the collective bargaining representatives (CBA Union) cannot be terminated under article 26 of the labour act.

3.1.3 National Labour Force Registration System and National Labour Database

Since 1980, the **Bangladesh Bureau of Statistics (BBS)** has been conducting **National Labour Force Surveys** at intervals of every four to five years. The findings of these surveys are primarily utilized for research purposes and for the formulation of Five-Year Plans. However, as these surveys are essentially designed for broader statistical and planning objectives, the data they produce are insufficient for effective employment forecasting and labour market planning in accordance with the structural transformation and growth dynamics of the economy.

To obtain up-to-date and continuous information on employed workers, the unemployed[1], and new entrants into the labour market, a transactional system is required — which, at present, does not exist. Consequently, it is not possible to:

- assess whether the standards of decent work are being maintained;
- determine the skills and competency levels of workers and plan training programs in accordance with market demand;
- identify the unemployed population and design targeted programmes or determine their eligibility for unemployment benefits;
- track new entrants into the labour market and prepare suitable employment plans for them;
- identify eligible citizens for pension schemes and old-age allowances to ensure they receive the services and benefits they are entitled to;
- identify special and marginalized groups in order to formulate appropriate policy interventions for them.

[1] An unemployed person as defined by the ILO is a person aged 15 or over who simultaneously meets three conditions: being unemployed for a given week; being available to take a job within two weeks; having actively sought a job in the last four weeks or having found one starting in less than three months. Source - INSEE Definition
- Unemployed person (according to the International Labour Organisation (ILO) definition) | Insee https://www.insee.fr/en/metadonnees/definition/c1129

Although the BBS surveys partially bridge the information gap in the labour market, significant deficiencies still persist. The deficiencies include:

- lack of comprehensive wage data and indicators;
- inadequate information on the informal sector;
- insufficient wage data disaggregated by gender, occupation, and region;
- absence of longitudinal and time-series data;
- neglect of non-wage benefits; and
- inconsistency between data collection practices and policy needs.

In this regard, the Labour Reform Commission makes the following recommendations:

(a) Recognition of Labour

To ensure the comprehensive recognition of all workers in Bangladesh and to guarantee their occupational identity, skill profiles, employment records, and compensation, it is imperative to establish a National Digital Labour Registration System and Database. This system shall encompass workers from both the formal and informal sectors, as well as new entrants to the labour market and the unemployed population.

The overarching objectives of the National Digital Registration System and Database are as follows:

- to ensure the universal recognition, identification, and registration of all categories of workers;
- to facilitate the effective implementation of social security and protection schemes;
- to conduct labour market analysis for forecasting future employment demand and supporting evidence-based employment planning;
- to assess skills demand and to design, coordinate, and implement market-responsive training and capacity-building programmes;
- to evaluate the skill levels and competency tiers of workers for developing targeted training strategies;
- to identify the unemployed population and formulate targeted social protection and employment support initiatives;
- to determine the eligibility of the unemployed for unemployment benefits and related interventions;
- to design and promote new employment generation programmes;

- to identify new labour market entrants and develop employment placement and integration strategies for them;
- to identify pension-eligible and senior workers and ensure their access to retirement and welfare benefits;
- to guarantee pension and old-age allowance entitlements for eligible citizens through proper identification and verification;
- to extend targeted assistance to marginalized, vulnerable, and at-risk workers;
- to identify special and disadvantaged population groups and develop inclusive and responsive policy frameworks for their empowerment;
- to identify workers affected by occupational accidents and ensure their compensation, rehabilitation, and reintegration;
- to support and promote labour market and employment-related research initiatives; and
- to produce and disseminate regular labour market monitoring reports—on a monthly, quarterly, semi-annual, and annual basis—using updated employment data, thereby enabling the continuous analysis of emerging labour market trends.

(b) Universality of the Database

The design and architecture of the registration system and database should ensure comprehensive universality and inclusiveness. The database must be structured in such a way that it enables the distinct identification and categorisation of all segments of the labour force. Specifically, it is expected to allow for the distinct identification of the following categories:

(a) workers in the formal sector (including registered employees and salaried professionals);
(b) workers in the informal sector (such as daily wage earners, domestic workers, gig workers, and agricultural labourers);
(c) employees of non-profit institutions and self-employed workers;
(d) migrant workers and those engaged in hazardous or high-risk occupations;
(e) workers and employees across both formal and informal sectors;
(f) new entrants to the labour market; and
(g) the unemployed population.

(C) Interoperability of all the necessary Databases

The National Labour Database must be interconnected (interoperable) with the National Identity Database, the National Skills Database, and other complementary databases to ensure that any worker or citizen can access necessary services from anywhere in the country. The key databases that need to be made interoperable include:

- National Skills Database: To link workers with opportunities for skill enhancement.
- Social Security and Pension System Database: To ensure eligible workers receive the benefits available to them (where applicable).
- National Identity (NID) Database: To facilitate identity verification and improve access to public services.
- Expatriate Workers' Database: To provide services for migrant workers and facilitate their reintegration upon return.

(G) Digital and Decentralised Access

The National Digital Labour Registration, Labour Management System, and National Labour Database need to be designed and implemented to ensure inclusive, digital, and decentralized access for all categories of workers, encompassing both formal and informal sectors, as well as new entrants to the labour market and unemployed individuals.

To this end, the following provisions should be ensured:

- Establishment of multi-channel registration facilities, including online portals, mobile applications, and designated labour offices.
- Mandatory obligation for employers to regularly update workers' information in the system.
- Provision of user-friendly mechanisms enabling workers to easily access, review, and manage information related to their employment status and social protection entitlements.

(H) Data Security and Confidentiality

The management and operation of the National Labour Database should adhere to internationally recognized data protection and cybersecurity standards. Appropriate technical and organisational measures need to be undertaken to safeguard workers' personal and employment-related data against unauthorized access, misuse, or breaches of confidentiality.

(I) Mandatory Registration for Employers and Workers

In order to ensure comprehensive coverage and effective implementation of the digital labour management framework, the following actions should be undertaken:

- Commencement of the registration process and operationalize the Digital Labour Management System within the timeframe of the Fiscal Year 2026.
- Legal obligation on all employers to register their workers in the national labour registry and database.
- Introducing mobile registration centres to facilitate the self-registration of workers in the informal sector and to enhance accessibility in remote or underserved areas.
- Mandatory labour inspection to monitor compliance with registration-related provisions and to ensure their effective enforcement through periodic supervision and reporting mechanisms.

(J) Utilisation of the Database for Policy Planning and Benefit Distribution

To ensure the effective use of the National Labour Database in evidence-based policy formulation and equitable distribution of benefits, the following measures are recommended:

- Introduce mandatory mechanisms to institutionalize the use of the Digital Labour Management System, including its components of registration and database management, across all areas of labour force administration, including recruitment and workforce planning.
- Ensure utilization of the database as a primary tool for revising minimum wages, implementing unemployment benefits, and administering pension schemes.
- Facilitate access to relevant data from the database for trade unions, public authorities, and other statutory bodies to support union formation, ensure workers' social protection, and uphold their legal entitlements.
- Encourage employers to utilize the database for workforce planning, skills mapping, and capacity development initiatives, thereby enhancing productivity and competitiveness.

(K) Implementation Strategy for Labour Force Registration and Database

To ensure the effective and sustainable implementation of the National Labour Registration and Database System, the following strategic measures may be adopted:

- Launch an initial pilot project to test the functionality, efficiency, and data integrity of the proposed labour registration system and database on a limited scale prior to nationwide rollout.
- Ensure active engagement of key stakeholders, including government agencies, trade unions, employers' associations, and development partners, to facilitate a participatory and well-coordinated implementation process.
- Adopt a phased implementation plan, enabling the gradual inclusion of workers from different sectors and regions to ensure comprehensive national coverage.
- Draw upon international best practices and experiences in establishing and operationalizing national labour registration systems and databases to strengthen the design, governance, and sustainability of the system in Bangladesh.

(L) Addressing Special Circumstances Related to National Identity (NID)

A significant number of workers in Bangladesh do not possess a government-issued National Identity (NID) card. Furthermore, due to various systemic and procedural barriers, some workers are compelled to submit false or fabricated NID information to secure employment. Although such practices are not legally permissible, they represent a critical structural issue that requires careful and pragmatic resolution. Workers lacking valid NID documentation often face heightened job insecurity and the risk of legal repercussions. The Commission has also observed that the absence of valid NID records frequently obstructs the disbursement of compensation to the families of deceased workers. If the establishment of a centralized labour database makes the submission of NID information mandatory, such problems could become more severe for workers without formal identification.

In this context, the Ministry of Labour and Employment (MoLE) may consider introducing a time-bound provision allowing workers to correct inaccurate NID records or obtain new NID cards. Additionally, the Government of Bangladesh may consider permitting employment based on birth certificates in cases where workers do not yet possess valid NID documentation, until such time as NID coverage becomes universal.

(M) National Labour-Related Surveys

To address the deficiencies identified in national-level labour surveys— particularly the absence of disaggregated data on regions, sectors, and specific population groups— it is imperative that future surveys be conducted in alignment with the standards and recommendations of the 21st International Conference of Labour Statisticians (ICLS), 2023, organised by the International Labour Organisation (ILO). The 2023 ICLS framework emphasises the inclusion of the informal economy within national labour statistics and establishes enhanced standards for measuring work and employment, employment and income, and household income and expenditure statistics. Accordingly, national labour surveys in Bangladesh should be revised and implemented in conformity with these updated international standards to ensure the generation of comprehensive, comparable, and policy-relevant labour statistics that accurately reflect the country's diverse workforce and labour market realities.

3.1.4 Outsourcing and Contractual Employment

The Bangladesh Labour Rules prohibit the recruitment of workers through outsourcing or contractors for any positions that fall within the permanent staffing structure of an organisation. However, in practice, there are significant shortcomings in enforcing this provision. As a result, a segment of society has found its access to government employment and related protections restricted. Moreover, disparities have emerged between permanently employed workers and those hired through outsourcing arrangements— particularly in terms of wages, overtime payment, bonuses, provident funds, and other labour protections for workers performing the same type of work at the same workplace.

In addition, many outsourcing agencies fail to comply with their legal obligations under labour laws. They often neglect to uphold workers' fundamental rights, leading to deficiencies in labour protection and growing job insecurity among outsourced employees.

In light of these issues, the Labour Reform Commission makes the following recommendations:

a) Outsourcing-based recruitment must be completely prohibited for permanent posts or positions within government offices and agencies. Those who are already engaged in such permanent posts/ positions under outsourcing arrangements should be absorbed as permanent employees of the respective institutions.

b) The existing legal provision prohibiting outsourcing-based recruitment for permanent positions must be fully enforced.

c) It must be ensured that:

- Outsourcing or contractual employment is never used as a means to deprive workers of their legal rights and benefits.
- The principle of "equal pay for equal work" is strictly applied so that outsourced or contract workers receive wages, benefits, and entitlements equivalent to those of permanent workers performing the same duties.
- The joint responsibility of employers and outsourcing agencies is clearly established and rigorously enforced.

d) To safeguard workers' rights, the Department of Inspection for Factories and Establishments (DIFE) should establish a dedicated and effective monitoring and enforcement mechanism to ensure the proper implementation and strict oversight of outsourcing regulations.

e) A comprehensive policy framework should be developed and implemented to make outsourcing agencies fully compliant with the same mandatory regulations applicable to direct employers under the Labour Act. This will ensure that, regardless of the employment arrangement, all workers receive fair treatment, job security, and access to applicable social protection benefits.

3.1.5 Creation of Employment Opportunities, Right to Work, and Ensuring Decent Work

Despite Bangladesh's notable economic growth in recent years— such as the GDP growth of over 8% in FY 2018-19— the corresponding growth in employment has not been equally robust. Between 2005-06 and 2010, the annual employment growth rate was 3.32%, which declined to only 1.33% during 2013–2016/17. Understanding why employment growth has lagged behind GDP growth is critical for guiding future employment policies.

Unemployment, especially youth unemployment, remains a national challenge. According to the National Skills Development Authority, approximately 2.2 million workers enter Bangladesh's labour market annually (Guidelines of the Industrial Skills Council, 2021). While the labour force participation rate has improved moderately to 61.2% (LFS, 2022), stark gender disparities persist: male participation is 80%, whereas female participation is 42.77%, reflecting a clear gender gap. Although the overall labour participation rate has risen from 58.2% in 2016 to 61.2% in 2022, gender inequality remains a major concern.

To address structural challenges in the labour market and harness its potential, an inclusive, equitable, and sustainable policy framework is required. This framework should prioritize skill development for youth, enhance women's participation, formalize informal employment, and safeguard labour rights.

Based on these considerations, the Labour Reform Commission makes the following recommendations:

a) Priority and Planning for Employment Creation

- Declare employment as a national priority and initiate a "Decade of Employment", developing coordinated plans to create new domestic and overseas employment opportunities.
- Set annual targets and implement coordinated measures to double the current employment growth rate within five years.
- Establish sector-specific short- and long-term targets for creating productive and decent employment in domestic and international markets.

b) Employment Policies and Institutional Framework

- Adopt an Active Labour Market Policy (ALMP) that considers current and future labour market trends, demands, opportunities, and barriers. Update the National Employment Policy 2022 to develop a new comprehensive National Employment Policy, with revisions every five years reflecting national and international labour market changes.
- Establish a Directorate of Employment and Skills Development under the Ministry of Labour and Employment to design and implement programs for unemployed and new entrants to the labour market.[2]
- Form a robust inter-ministerial task force to achieve annual employment targets and coordinate implementation. Membership should include: Ministry of Finance, Ministry of Planning, Ministry of Industries, Ministry of Education, Ministry of Commerce, Bangladesh Bank, Ministry of Labour and Employment, Ministry of Expatriates' Welfare and Overseas Employment, Investment Development Authority, trade associations, labour unions, and the National Skills Development Authority.
- Strengthen the Planning Commission to conduct short- and long-term research for generating decent, productive, and dignified employment, involving domestic and international experts and institutions.
- Utilize the National Labour Registration System and database for research and policy planning purposes.

c) Employment Creation Incentives

- Incorporate employment creation, especially labour-intensive sectors, into tax policies. Proportional tax incentives may be offered for sustainable employment generation, with particular focus on small and medium enterprises (SMEs).
- Develop short-, medium-, and long-term national economic plans centered on employment. These should include investment-friendly incentives for domestic and foreign investors to secure the necessary capital for employment generation.
- Include decent employment conditions as prerequisites for investment approvals and incentives in large public and private projects, encouraging labour-intensive sectors.

d) Self-Employment Promotion

[2] Please See Section 4 for the detailed structure of the Directorate of Employment and Skills Development under the Ministry of Labour and Employment.

- Promote self-employment alongside wage employment, with coordinated programs providing entrepreneurship training, one-stop service centers, mentorship, and common facility support through public-private partnerships nationwide.
- Prioritize micro, small, and medium enterprises (MSMEs) in self-employment strategies. Reform SME policies and develop a master plan for entrepreneurship promotion.
- Provide pre-retirement training for government and private employees to prepare them as entrepreneurs, ensuring investment and accountability mechanisms.
- Introduce special incentives for marginalized populations, women, unemployed youth, and other disadvantaged groups to encourage self-employment.

e) Working Hours, Job Security, and Unemployment Protection

- Implement eight-hour workdays across all industries, sectors, special economic zones, and employment types (formal or informal, profit or non-profit) to ensure workers' health and productivity. Overtime may be permitted with regulatory approval, but default shifts should be eight hours.
- Create alternative work opportunities by engaging the unemployed in re-skilling and up-skilling programs, including participation in government development projects.
- Take punitive measures if law enforcement agencies destroy fishing nets, battery-powered rickshaws, or other means of livelihood while conducting operations against illegal fishing or unauthorized vehicles, and establish compensation and rehabilitation mechanisms prior to such operations.
- For job seekers who remain unemployed six months after entering the labour market, provide training, vocational placement, and a fixed-term apprenticeship allowance.
- For employed workers who become unemployed, consider temporary government unemployment benefits until re-employment, with attention to matching workers' skills to suitable alternative sectors.

3.1.6 Skill and Human Resource Development, Productivity, and Sustainable Enterprise

Bangladesh's labour force remains trapped in a vicious cycle of low skills, low productivity, and low income. Low productivity persists across all sectors of the economy. The only sustainable way to overcome this is through enhancing skills via structured training programs, thereby creating a skilled and highly productive workforce.

Although several national policies and action plans exist—such as the *National Employment Policy (2022)*, the *National Action Plan for Skills Development (2022–2027)*, the *National Skills Development Policy (NSDP 2020)*, the *Bangladesh National Employment Strategy (2019)*, and the *National Education Policy (2010)*—these have largely remained unimplemented. The *National Labour Policy (2012)*, while being a crucial document for the protection and promotion of workers' rights, lacks the institutional infrastructure necessary for effective implementation and for addressing contemporary challenges.

Currently, a range of training and certification programs—including skilling, upskilling, reskilling, entrepreneurship development, apprenticeship, and recognition of prior learning—are being

implemented by private organisations and philanthropic NGOs. However, there remains a significant lack of coordination between public and private initiatives. On the one hand, Bangladesh faces an acute shortage of skilled labour amidst a rapidly expanding economy; on the other, high unemployment rates, especially among youth, raise serious questions about the quality and effectiveness of existing skill development efforts.

Against this backdrop, the Labour Reform Commission puts forward the following recommendations:

(a) Action Plan and Coordinated Initiatives

- All government institutions engaged in skills development should be brought under a single umbrella mechanism, aligned with the classified demands of the labour market dynamics. Jointly with the apex bodies of employers, these institutions must prepare the necessary curriculum, infrastructure, and pool of qualified trainers to meet labour market demands. International cooperation and bilateral partnerships should be strengthened in this regard. The National Skills Development Authority (NSDA) should be empowered to bring all public and private training institutions under its accountability and coordination framework.

- A coordinated national initiative, led by the proposed Department of Employment, must be undertaken to transform the country's human resources into a skilled and productive workforce, supported by a concrete implementation plan.

- Existing training and skills development infrastructures must be restructured and optimized in alignment with economic growth patterns and sectoral dynamics to create a workforce capable of meeting both domestic and international market demands.

- Direct employer involvement in the skill development process should be enhanced to ensure that training outputs are aligned with the real needs of industries and enterprises.

- Within a short period, Bangladesh should sign Mutual Recognition Agreements (MRAs) with at least five countries to enable the employment of Bangladeshi workers in higher-skilled occupations abroad. Over the next five years, this initiative should gradually be extended to other current and potential overseas labour markets.

- Strong coordination must be established between pre-employment education and training programs and on-the-job skill enhancement activities.

- The system for skills anticipation and forecasting should be strengthened through digital integration and coordinated management, ensuring continuous improvement of skill standards in response to evolving market demands.

- The national training curriculum should be revised to enhance soft skills, intellectual competencies, and problem-solving abilities necessary for a modern workforce.

- Necessary legal amendments should be made to create special opportunities for women, youth, persons with disabilities, and other marginalized groups, thereby reducing inequality and promoting inclusive participation in the labour market.

- A national plan should be formulated to develop an adequate supply of technically proficient and industry-relevant human resources in sectors linked to the Fourth Industrial Revolution (4IR), both to meet international market demands and to attract foreign direct investment (FDI).

(b) Policy and Institutional Reforms

- In alignment with the classified labour market demands and dynamics, all public institutions engaged in skills development must be brought under a single umbrella framework. Jointly with the apex bodies of employers, these institutions should develop relevant curricula, infrastructure, and a pool of qualified trainers to effectively respond to sectoral needs. Building international cooperation and bilateral partnerships will be essential for this purpose. The National Skills Development Authority (NSDA) should be strengthened and empowered to ensure that all public and private training institutions are brought under a comprehensive accountability and coordination system.

- Under the Ministry of Labour and Employment, "Employment Exchanges" should be established in all peripheral administrative districts. These centres would function as bridging mechanisms between employers and potential employees, thereby facilitating labour market matching and employment generation.

- The fragmented and often conflicting institutional positions of existing policy and implementing bodies have been major obstacles to achieving the desired goals of skills development. In particular, differences in institutional approaches between the NSDA and the Bangladesh Technical Education Board (BTEB) have resulted in inefficiencies and duplication of efforts. To address this, a special task force should be formed to strengthen coordination and clearly define the respective roles and responsibilities of these institutions.

(c) Apprenticeship, Internships, and Unemployment Protection

- Since introducing a universal unemployment benefit will require significant time and resources, structured apprenticeship and internship programs should be introduced under existing employers to engage new entrants to the labour market, ensuring that no young person remains idle. For this purpose, a National Apprenticeship and Internship Fund should be established.

- Promising new professions and emerging sectors with high potential for specialized skill creation should be identified. These sectors should receive targeted policy support and investment to build a workforce capable of sustaining their growth and competitiveness.

(d) Financial Allocation

- Skill development should be incorporated into the national budget, either as a subsector under the education budget or as a separate dedicated sector to ensure consistent funding and accountability.

- Investment in research and development, particularly at the university level, should be significantly increased. To strengthen the link between industry and academia, incentives for industrial collaboration must be introduced. In this context, it is recommended that at least 5% of GDP be allocated to the education and skills development sectors.

(e) Incentives for Skills Development

- Since business expansion is intrinsically linked to employment creation, a Sustainable Business Growth Roadmap should be developed. This roadmap must outline standards and benchmarks for sustainable enterprises, ensuring alignment with long-term employment goals.

- The government should design incentive mechanisms to encourage private sector investment in skills development and job creation, particularly in sectors that demonstrate strong domestic and international demand.

(f) Education Reform and the Dignity of Technical and Vocational Education

- A coherent linkage must be established between the National Education Policy and the National Skills Development Policy, ensuring that skills development goals are integrated across all levels of education.
- To moderate the excessive pursuit of postgraduate degrees and enhance the social and professional status of technical and vocational education (TVET), a comprehensive and coordinated reform initiative is required.
- Work should begin on developing a National Qualifications Framework (NQF) that integrates TVET and higher education, allowing TVET graduates to pursue advanced degrees at universities at any stage of their careers.

(g) Effectiveness of Skills Development Programs

- A significant portion of government investment in project-based training has been wasted due to widespread corruption. The main causes include the bypassing of genuine training institutions and awarding contracts to agencies lacking the institutional capacity to deliver effective training. A comprehensive reform process is therefore necessary. A rating system should be introduced to identify credible training providers, and only institutions meeting minimum quality standards should be eligible to compete for training contracts. A special task force may be established to oversee this reform.

- In skills development projects financed by foreign aid, the practice of providing stipends or allowances to trainees should be discontinued. This measure will help eliminate corruption and moral hazard problems associated with such programs and will encourage greater private sector investment in the training industry.

3.1.7 Preparing for Overcoming the Challenges of the Fourth Industrial Revolution (4IR)

Every industrial revolution brings structural transformations to the economy. During such transitions, widespread unemployment often occurs temporarily, but as economic expansion continues, new forms of employment emerge. This process typically involves the disappearance of old skill sets and the emergence of new skill demands.

The Fourth Industrial Revolution (4IR) is already exerting a profound influence on the global and national economy. However, due to a largely slogan-driven and uncoordinated approach, Bangladesh has not yet been able to harness its full potential. To adapt effectively to the evolving technological landscape, both short-term and long-term preparedness are required across all sectors. A dual strategy must be developed—one that mitigates potential job disruptions while simultaneously leveraging emerging opportunities.

Against this backdrop, the Labour Reform Commission offers the following recommendations:

(a) Addressing Potential Employment Disruptions

- Employers' recruitment and automation plans should be developed in consultation with relevant trade unions to avoid sudden layoffs that might trigger labour unrest. A comprehensive strategy must be devised for workers who may be displaced, focusing particularly on the rehabilitation and reemployment of those affected in vulnerable sectors.

- The National Skills Development Authority (NSDA), in collaboration with the private sector, should formulate and implement an integrated plan for anticipating future skill requirements. Where short-term skill shortages exist, foreign workers may be employed temporarily—under a well-defined ratio between domestic and foreign employees—to allow gradual skill transfer and capacity building among local workers.

- Similar to the concept of a carbon tax, a "labour displacement tax" could be introduced on technology-driven automation that replaces human workers. The revenue from such a tax could be directed toward incentivizing labour-intensive industries and funding the rehabilitation and reskilling of displaced workers.

- Existing ISCs should be institutionally strengthened, and new ISCs should be established in priority sectors such as healthcare, biotechnology, renewable energy, robotics, and automation to build training capacity aligned with emerging skill demands.

- Systematic on-the-job training programs should be introduced across all sectors to upgrade the skills of existing workers and meet the rising demand for higher-level competencies.

- A specialized reskilling program should be launched for workers displaced by automation, including targeted training, job placement support, and temporary stipends during the training period to ensure livelihood security.

(b) Harnessing the Opportunities of the Fourth Industrial Revolution

- To attract foreign investment and meet international market demands, a comprehensive National 4IR Skills Development Plan should be developed to create a technically proficient workforce for 4IR-related sectors. As part of this plan, a national STEM development initiative (Science, Technology, Engineering, and Mathematics) should be introduced, including scholarship programs, professional training, and apprenticeship schemes to build a strong innovation-driven talent base.

- A National Skills Development Program on Emerging Technologies—covering key 4IR domains such as artificial intelligence (AI), robotics, digital technology, cloud computing, 3D printing, and biotechnology—should be launched. This program should ensure collaboration between the private sector and global labour markets, aligning training with the needs of emerging industries.

- Partnerships should be established between industry and academia to create employment opportunities for STEM graduates. Special initiatives must also be undertaken to increase women's participation in science and technology-driven occupations.

- Targeted investment in research and development, particularly at the university level, should be expanded. The government should provide incentives to industries that foster close collaboration with academic institutions to enhance innovation and technological advancement.

- To promote technology-based entrepreneurship, 100 Innovation and Entrepreneurship Hubs should be established across district-level and university-based ecosystems. These hubs would serve as incubation and acceleration platforms for startups and innovators, catalyzing local employment generation and innovation-driven growth.

3.1.8 Addressing Regional Disparities and Promoting Balanced Urbanisation

Significant regional disparities in employment opportunities persist across Bangladesh, stemming from uneven industrialisation, inadequate policy support, and the lack of reform in labour laws and policies. As industries and employment opportunities remain concentrated in a few urban centers—particularly Dhaka—internal migration pressures toward major cities continue to intensify. This unregulated urbanisation has placed enormous strain on urban infrastructure and basic services. Conversely, many underdeveloped regions lack the necessary industrial infrastructure, resulting in high unemployment and limited economic opportunities.

In this context, the Labour Reform Commission recommends the following measures:

a) To reduce visible and structural regional disparities in the labour force, targeted measures should be taken to ensure sustainable and decent employment in lagging regions. These efforts should align with reformed labour policies, labour laws, employment and industrial policies, and other related frameworks.

b) To promote sustainable and balanced urbanisation and ensure overall national development, the government should pursue planned industrial decentralisation and diversification, alongside the provision of adequate civic amenities, in order to enable a more equitable distribution of labour across regions. Such measures will help mitigate the growing problem of internal migration toward major cities, especially Dhaka.

c) Special initiatives should be undertaken to establish labour-intensive industries and Special Economic or Industrial Zones in lagging regions, with explicit employment creation targets integrated into their planning and implementation.

3.1.9 Sectoral Employment

Bangladesh's economy remains predominantly agriculture-based, a sector that—despite its low productivity—still provides employment to the largest share of the population. In contrast, the industrial sector, which is crucial for sustained economic growth, has been experiencing gradual contraction. While the services sector continues to absorb a large portion of the labour force, its expansion has slowed in recent years.

The rise of the information technology–driven gig economy has created new employment opportunities but remains largely informal and unprotected, leaving workers without institutional recognition or safeguards. Bangladesh has emerged as a global hub for online freelancing, yet gig workers are often deprived of fair wages and social protection. Similarly, although outsourcing practices have expanded across both public and private sectors, the rights and entitlements of outsourced workers remain inadequately addressed.

In light of this reality, the Commission recommends the following sector-specific employment measures:

Agriculture

a) Identify those who work on others' land—whether wage earners or sharecroppers—as agricultural labourers for the purpose of legal recognition.

b) Ensure that agricultural labourers are brought under the protection of labour laws without any conditional exclusions.

c) Guarantee the right to organise for agricultural workers by incorporating explicit provisions in law allowing the formation of trade unions and federations at the Union Parishad, Upazila, District, and National levels.

d) In line with the Commission's broader recommendation for unionisation in the informal sector, allow groups of at least 100 agricultural labourers within each Union Parishad to form organisations empowered to negotiate and engage with relevant authorities on labour issues.

e) Strengthen the capacity of Union Parishads and Village Courts to address wage-related disputes and claims. In cases of failure, ensure that agricultural labourers have access to the Labour Inspector under Section 124(a) of the Labour Act.

f) Recognise agricultural workers' entitlement to compensation for occupational injuries and hazards, particularly those arising from chemical and pesticide exposure, on par with other categories of workers.

g) Introduce government-led skills development programs for agricultural labourers to enhance productivity and income opportunities.

h) Ensure social protection for agricultural workers, particularly by integrating them into social insurance schemes.

Industry

a) Expansion of Labour-Intensive Industries:
Given the downward trend in employment generation amid global competition, the challenges of the Fourth Industrial Revolution, and persistent productivity gaps, a national employment plan should be developed to identify labour-intensive industries and double industrial employment within the next three years.

b) Diversification:
To reduce overdependence on the ready-made garment (RMG) sector, the national plan should prioritise employment creation through industrial and product diversification and market expansion. The existing list of priority and export-diversified industries should be reviewed and updated to reflect new development priorities.

c) Development of Small Industries:

Reform the definitions of family-based, micro, and small enterprises (MSEs) and expand institutional support through coordinated efforts among relevant agencies. The challenges faced by these enterprises extend beyond access to finance—they encounter obstacles at every stage of production and service delivery. Many of the previously announced incentives have not reached this segment, despite their vital role in employment generation. A coordinated initiative should be launched to double employment in family-based and small enterprises within three years.

d) Technological Advancement:

Enhance productivity and competitiveness through the adoption of sustainable and advanced technologies, improvement of existing technologies, and comprehensive worker training aligned with new technological requirements.

Service Sector

a) Recognition of Workers:

Employment characteristics in the service sector differ significantly from those in the goods-producing sector. Over the past two decades, the service sector has witnessed the emergence of numerous new forms of employment, most of which are concentrated in the informal economy. In this context, it is essential that all workers in the service sector be formally recognised under the labour law.

b) Employment Generation:

To expand employment opportunities within the service sector, the proposed Directorate of Employment and Skills Development should identify key sub-sectors and set a target to triple employment growth in the next three years.

Micro and Small Enterprise-based Employment

a) Formalisation of the Informal Sector:

- Initiatives should be taken to increase the number of registered business entities and to simplify registration procedures.
- A unified registration system should replace the current multiple registration requirements.
- A long-term tax structure must be established for newly registered micro and small enterprises (MSEs) to protect entrepreneurs from tax-related harassment. A clear and predictable compliance framework should be developed to ensure transparency and build trust among entrepreneurs.
- Awareness and incentive campaigns should be launched to encourage registration of all categories of CMSMEs (Cottage, Micro, Small, and Medium Enterprises).

b) National CMSME Plan and Roadmap:

A comprehensive national plan should be developed and implemented with specific, time-bound targets for the number of CMSMEs, their contribution to employment, and their share of GDP in the short, medium, and long term. The plan should include institutional and financial resource allocations and should be initiated from FY2025–26.

The following targets may be set:

- The number of CMSMEs to increase from 7.8 million in FY2022–23 to 8.2 million in 2026, 9.4 million in 2030, and 11.9 million in 2040.
- The share of CMSMEs (including informal ones) in total employment to rise to 60 million workers by 2040.

c) Cluster-based initiatives for local product industries should prioritise women and disadvantaged groups.

d) Micro and small entrepreneurs should receive training and support services on financial management, raw material sourcing, product design, packaging, marketing, market exploration, business expansion, and branding. Since they cannot afford long-duration training programs, blended learning and micro-learning approaches should be introduced to enhance accessibility and practical application.

e) Although many small producers possess production skills, they often fail to adapt to modern market systems. Therefore, **product marketing services** should be introduced and linked to online marketplaces to facilitate market access.

f) Micro and small entrepreneurs often sell goods on credit and face delays or harassment in payment recovery. To address this, a digital supply credit system should be introduced.

g) To safeguard the interests of both entrepreneurs and their workers (in terms of appointment letters, working hours, wages, etc.), initiatives should be taken to promote mutual understanding and cooperation between the two parties.

h) Home-based and family industries form an integral part of Bangladesh's cultural heritage. Special projects and **subsidy programs** should be introduced to protect and promote such traditional industries.

i) To reduce capital costs and promote the use of modern machinery, district-based common facility centers should be established, allowing small entrepreneurs to access shared resources on a rental basis.

j) To enhance credit flow for micro and small entrepreneurs, in addition to Bangladesh Bank's refinancing scheme, the government may provide subsidies on loan processing costs. To address the compliance deficit, an alternative credit rating mechanism may be made mandatory, with the successful existing models expanded further.

k) To support evidence-based planning and incentive design for CMSMEs, the Bangladesh Bureau of Statistics (BBS) should conduct national surveys every two years and a census every five years.

Apprenticeship

a) Apprenticeship programs should be introduced jointly by training institutions and employers. Employers should have the right to select their preferred training institutions.

b) The apprenticeship curriculum should be designed to reflect current industry demands. Its core elements will include:

- Relevant Training: Sector-specific, demand-driven training jointly designed by training institutions, the NSDA, and industry investors.

- Hands-on Experience: Ensuring that apprentices acquire practical experience, thereby increasing their employability upon completion.
- Regular Feedback: Employers should provide continuous input on training methods to enhance program relevance and effectiveness, facilitating the smooth integration of graduates into the workforce.

c) Based on lessons from previous successes and failures of informal apprenticeship programs, a dedicated initiative for the informal sector should be launched under the NSDA.

d) Enterprises with annual turnover exceeding BDT 10 crore may be brought under an apprenticeship levy system. Apprentices trained through this fund will be given priority placement in the contributing enterprises.

e) To encourage participation of small and medium-sized enterprises (SMEs), financial incentives should be introduced—either as apprenticeship stipends or tax rebates—to help them utilise this program for developing skilled manpower.

f) Comprehensive career support programs should be established for workers both before and after entering the labour market. These programs will include career planning guidance and integration into apprenticeship and internship opportunities. The process should involve all educational institutions from the higher secondary level, along with employers and training providers.

3.2 Wage and Just Share

Wage and just share constitute the foundation of workers' rights and the establishment of a just society. According to the Constitution of Bangladesh, work is both a right and a duty of every citizen, and every person has the right to receive remuneration commensurate with their qualifications and the value of their labour (Article 20). Furthermore, in explaining the provision of basic necessities as a fundamental principle of state policy, Article 15(b) explicitly refers to "reasonable wages," implying that workers' wages must be sufficient to meet the basic needs of themselves and their families.[3] Formulated in light of the constitutional obligations and directives, the objectives of the National Labour Policy 2012 include ensuring decent work in both the formal and informal sectors in accordance with international labour standards; adopting necessary measures for the continuous improvement of the living standards of working people; eliminating gender disparities in the workplace; and according explicit priority to social security.

However, Bangladesh's labour market continues to face widespread wage disparities and wage-related problems that adversely affect the socio-economic wellbeing of workers. Informal sector workers are particularly deprived compared to their counterparts in the formal sector, often being denied fair and equitable wages. In many cases, workers are not compensated for overtime, and

[3] Furthermore, according to the *Fundamental Principles of State Policy* enshrined in **Article 14** of the Constitution of Bangladesh, *"It shall be a fundamental responsibility of the State to emancipate the toiling masses—the peasants and workers—and backward sections of the people from all forms of exploitation."* In essence, this provision obligates the State to ensure the liberation of peasants and workers from exploitation and to safeguard the just rights of all classes of citizens within society.

there is no comprehensive policy framework for regular wage revision. Moreover, although workers play a vital role in production, they rarely share in the profits generated. Irregularities, delays, and various unlawful practices in wage payments further undermine their financial security.

While most workers receive the officially declared minimum wage, this amount often remains below the poverty threshold, leaving them in chronic economic distress. Agricultural labourers, tea garden workers, construction workers, rickshaw pullers, and domestic workers are among those most severely affected. Low wages hinder their ability to meet basic needs, significantly diminishing their quality of life. The absence of sector-specific wage standards exacerbates this problem, resulting in arbitrary wage determination largely at the discretion of employers. Additionally, mismatches between skill levels, experience, and pay, along with persistent gender wage gaps also constitute a major concern. Workers engaged in cleaning services, care work, domestic labour, ride-sharing, gig and platform-based work, and street vending remain especially vulnerable due to the absence of a guaranteed minimum wage, exposing them to ongoing financial insecurity.

In Bangladesh, the gap in wealth distribution—the gap between the rich and the poor—has expanded since independence, running counter to the nation's egalitarian aspirations. The disparity between top earners and low-income groups has reached alarming proportions.[4] By 2021, the Gini coefficient had risen to 0.499, with the richest 10 percent of the population accumulating 40.92 percent of total national income. Even more strikingly, the wealthiest 5 percent alone command nearly 30 percent of the country's total income. In effect, two-thirds of Bangladesh's total income is concentrated in the hands of the richest 30 percent, while the remaining 70 percent of the population share the residual one-third. This data underscores a troubling trend—Bangladesh is now on the verge of becoming a high-inequality economy.

3.2.1 Universal National Minimum Wage and Sectoral, Regional, and Occupational Minimum Wages

Bangladesh currently does not have a universal national minimum wage. Since independence, the Wage Board of Bangladesh has periodically declared minimum wages for a limited number of sectors. However, an examination of the minimum wage rates declared by the Wage Board reveals that the levels are astonishingly low. Analysis shows that in 22 out of 39 sectors, the declared minimum wages remain below the poverty threshold.[5] Among the sectors, sawmills offer the highest declared minimum wage (BDT 17,900), followed by the construction and furniture industries (BDT 16,240), and the ship-breaking industry (BDT 16,000). In many sectors, the minimum wages have not been revised for over four decades. In several sectors, minimum wages have also been declared for both workers and employees. Yet, in 18 sectors, even the employees'

[4] World Inequality Database (2021) World Inequality Report 2022 - WID - World Inequality Database https://wid.world/news-article/world-inequality-report-2022/#:~:text=The%20World%20Inequality%20Report%202022%20presents%20the%20most,than%20one%20hundred%20researchers%20from%20around%20the%20world.

[5] The declared wages in five among the other sectors are paid either on a piece-rate basis or on a daily basis.

minimum wages remain below the poverty threshold. For both workers and employees, the officially declared minimum wages in all sectors fall far short of the living wage standard.

A comparison between living wage and actual average wage demonstrates the adverse consequences of low pay on workers and their families — including extreme poverty, malnutrition, and debt dependency.

Low wages also lead to reduced productivity and undermine the competitiveness of enterprises. Among the key causes of labour unrest in industrial establishments are delayed payments of wages and overtime bonuses (particularly around Eid festivals, 76.7%), demands for wage or piece-rate increases (52.2%), and prolonged wage arrears (21.3%).

The coexistence of widespread unemployment and an inequitable wage structure points to an unsustainable situation, with rising discontent in the labour sector serving as a visible symptom. This growing dissatisfaction could potentially act as a catalyst for broader political and social instability.

Against this backdrop, the Labour Reform Commission makes the following recommendations regarding the establishment of a universal national minimum wage and sectoral, regional, and occupational minimum wages:

(a) Universal National Minimum Wage

- A universal national minimum wage should be declared for all workers in Bangladesh, on the basis of which minimum wages across all sectors—including both formal and informal—shall be determined. This national minimum wage shall serve as the minimum benchmark for wage determination across all sectors of the economy and for workers employed in public and private, domestic and foreign enterprises, as well as those engaged at the individual level.
- Given the absence of a wage standard in the informal sector, special priority should be accorded to reducing wage disparities within this sector.
- In determining the national minimum wage, the concept of a “living wage” should serve as the guiding principle.
- The universal national minimum wage should be reviewed and revised every three years, and adjusted annually in accordance with inflation and changes in the cost of living.

(b) Sectoral and Occupational Minimum Wages

- Based on the national minimum wage, it is necessary to determine separate minimum wages for specific sectors and occupations, taking into consideration the nature of work, sectoral demand and challenges, risks, and regional variations. In no case shall the sectoral or occupational minimum wage be lower than the national minimum wage; rather, it must be equal to or higher than the national minimum wage.
- In cases where the declared minimum wage for a specific sector or occupation falls below the national minimum wage, a provision must exist for its automatic adjustment to the level of the national minimum wage.

(c) Collective Bargaining

In the process of revising sectoral and occupational minimum wages, workers' legal right to collective bargaining must be preserved. The minimum wage determined through collective bargaining shall not, under any circumstances, be lower than the national or sectoral minimum wage.

(d) Legal and Institutional Framework for Wage Determination

- A Permanent National Wage Commission must be established, comprising individuals experienced and skilled in labour, labour economics, and wage determination, as well as representatives of workers and employers, to determine the national minimum wage.
- For setting sectoral and occupational minimum wages, one or more Minimum Wage Determination Committees should be formed under the Permanent National Wage Commission.
- Necessary legal reforms and amendments should be undertaken to incorporate the structure, functions, and other relevant provisions of the National Wage Commission into the labour law.
- The National Wage Commission should be mandated to organise regular dialogues on wage-related issues and to publish research-based reports on the outcomes and benefits of fair wage practices.

(e) Elimination of Wage Inequality

- Measures should be taken to ensure balance by reducing the existing gap between the highest and lowest levels of pay within wage structures.
- Effective initiatives should be undertaken to minimise wage disparities between the public and private sectors.
- Equal pay for all workers — including women, men, persons with disabilities, and indigenous workers — should be made legally mandatory. It needs also to be ensured that improvements in workers' living standards correspond with the overall economic growth and industrial development of the country.

3.2.2 Standards and Methods for Wage Determination

In Bangladesh, minimum wages have not been determined for most formal and informal sectors of the economy. The existing structure for wage determination is outdated and it cannot establish a fair wage system aligned with the country's development aspirations. Determining the levels and formulas for minimum wages/ salaries/ remuneration is a complex task. Setting the minimum wage too low pushes workers and their families toward inhuman living conditions, contradicting the national goal of poverty alleviation.

The fundamental objective of minimum wage determination is to ensure a basic level of economic and social security for able-bodied citizens and to eliminate wage disparities, particularly between men and women. Moreover, the minimum wage policy constitutes an integral component of the

employment policy, serving as a foundation for establishing a structured wage and salary framework that supports youth employment strategies.[6]

The Labour Reform Commission therefore recommends the following in relation to the standardsand methods of wage determination:

A. Standards for Wage Structure

- The minimum wage should be determined considering a single income-earning member per family, ensuring that a worker's income can adequately meet the basic needs of their family.
- Total wage should include basic pay, house rent allowance, medical allowance, and communication allowance. The basic pay must constitute no less than 58% of the total declared wage, including allowances.
- Other allowances — such as food, transportation, education allowances, and any existing ration facilities — should remain outside the wage structure.
- Piece-rate or task-based wages must be set in such a way that a worker can earn the equivalent of the minimum wage for an eight-hour working day.

B. Standards and Data for Determining the National Minimum Wage

- Monthly Family Food Expenditure: The monthly cost of food shall be calculated based on the balanced diet prescribed by the World Health Organisation (WHO), the average market price of essential commodities as determined by the Department of Agricultural Marketing or the Bangladesh Bureau of Statistics (BBS), and the average family size as defined in the national pay scale.
- Monthly Family Housing Expenditure: Housing costs shall be estimated based on the standard housing space for a four-member family as determined by the National Housing Authority, and the average rent reported by the BBS. The ownership status of the worker's residence shall not be considered.
- **Monthly Family Health Expenditure:** For a four-member family, health expenditure shall be determined based on the minimum premium for health insurance or the average health cost estimated by the Household Income and Expenditure Survey (HIES) and Bangladesh Demographic and Health Survey (BDHS), adjusted for inflation.
- **Monthly Family Education Expenditure:** Assuming two members of the family are students, the education cost shall be estimated using HIES data, adjusted for inflation.
- **Monthly Family Social and Recreation Expenditure:** This category shall include personal (e.g., care, clothing, footwear, furniture, mobile, internet, financial transactions), social (e.g., hospitality, gifts, family events), and recreational (e.g., cultural activities, travel, dining out) expenses for a four-member family. Initially, this expenditure may be estimated as 10% of total wage, subject to revision based on future research and data.

[6] ILO (2014) General Survey of the reports on the Minimum Wage Fixing Convention, 1970 (No. 131), and the Minimum Wage Fixing Recommendation, 1970 (No. 135). Report of the Committee of Experts on the Application of Conventions and Recommendations (articles 19, 22 and 35 of the Constitution). Report III (Part 1B), - Geneva, pg. 200.

- **Monthly Family Transportation Expenditure:** Transportation costs shall be determined considering seasonal travel, workplace commuting, social event travel, and long-distance travel for a family of four.
- **Minimum Monthly Savings:** In determining the universal national minimum wage, the proportion of a worker's minimum monthly savings needs to be determined in accordance with the guiding ILO principles for establishing a living wage.
- All calculations must be based on reliable data and standards from national institutions, including the Bangladesh Bank, Bangladesh Bureau of Statistics, and other relevant government agencies.

3.2.3 Rationalisation of Production Targets and Piece-rate Payment Determination

In Bangladesh, it is often observed that after a wage increase, employers unilaterally determine new production targets, piece-rate–based targets and piece-rate payments without consultation with workers. In this regard, the Commission recommends the following:

- A participatory mechanism must be established to set production targets and piece-rate wages, enabling the determination of the maximum and/or minimum daily production targets and corresponding piece-rate payments for specific jobs in relevant industries.
- A factory-level committee should be formed, comprising employer and worker representatives along with a time-study expert, to determine production targets and piece-rate wages in line with international standards and national contexts.
- In establishments where trade unions exist, their mandatory participation must be ensured in setting such production targets.

3.2.4 Wage Growth Rate and Payment Process

To ensure a sustainable wage growth mechanism, the Labour Reform Commission recommends the following:

a. The annual rate of wage increase should be automatically aligned with the average inflation rate to protect workers' purchasing power. The determination of this rate may follow the guidelines of the International Labour Organisation (ILO) document adopted at the Meeting of Experts on Wage Policies, Including Living Wages (19–23 February 2024).

b. Payment of all wages and allowances should be made mandatory through digital systems, ensuring transparency, accountability, and traceability of wage transactions.

3.2.5 Workers' Earned Entitlements

Depriving a worker of any earned income or entitlement—whether due to death, dismissal, or any other reason—constitutes a violation of labour rights and human rights. In Bangladesh, workers in both formal and informal sectors are often denied their rightful entitlements on various pretexts, which pushes their families into crisis. The need for reform in this regard has long been recognised.

To ensure workers' rightful access to their earned entitlements, the Labour Reform Commission makes the following recommendations:

a) The eligibility requirement for death compensation should be reduced from **two years** of service to one year.

b) Under no circumstances should a worker be deprived of their earned entitlements. The provision allowing non-payment of compensation in cases of dismissal should be abolished, and workers must be ensured payment of all compensations, gratuity and other dues, based on their previous service.

c) Gratuity and compensatory benefits are the rightful entitlements of workers and must not be withheld under any circumstances. As gratuity or compensation relates directly to a worker's past service, all workers must have a legal guarantee to receive such benefits, regardless of the reason for termination of employment.

3.2.6 Mandatory Contingency Fund and Wage Insurance

Irregular wage payments and wage arrears remain persistent challenges in Bangladesh. Additionally, loss of income due to retrenchment often leads to severe hardship and insecurity for workers and their families. Despite existing social protection measures, the consequences of such events remain unaddressed, underscoring the need for new social insurance mechanisms. Wage insurance represents an innovative policy approach designed to provide temporary income support to workers who lose their jobs or are re-employed at lower wages.

In this regard, the Labour Reform Commission recommends the following:

a) Disruptions may occasionally occur in the supply and payment processes of export-oriented industries. In addition, natural disasters and pandemics may also hinder the timely settlement of payments. In such circumstances, workers are usually the worst affected. Lack of employer's preparedness often exacerbates further the distress of workers and administrative challenges. To mitigate such crises, the Commission recommends that the Government establish a mandatory contingency fund for all export-oriented industries. Each factory or establishment shall deposit an amount equivalent to two months' wages of its workers into this fund. The fund shall be jointly managed by employers, the Government, and the respective industry associations (where applicable). In case of employer default or absence, the Government shall retain the authority to take emergency decisions for the benefit of workers.

b) The Bankruptcy Act should be amended to ensure that workers' dues are settled first, prior to repayment of any Government claims.

c) A National Wage Guarantee Insurance Scheme should be introduced to cover situations where:

- an employer fails to pay wages,
- a worker is retrenched, or
- a worker is re-employed at a lower wage.

Under this scheme, both employers and the Government shall make annual contributions. The scheme may be administered under the supervision of the Labour Commission.

3.2.7 Accountability and Responsibility

An essential component of minimum wage policy is its implementation and enforceability. The United Kingdom has introduced stringent regulatory oversight and penalty mechanisms, which help maintain fair labour practices (UK Government, 2023). Conversely, Bangladesh faces significant implementation challenges due to its large informal economy, weak labour **protection** frameworks, and institutional capacity gaps (Government of Bangladesh, 2014). According to ILO reports, in many developing economies, minimum wage policies fail to deliver their intended benefits due to ineffective enforcement, resulting in labour exploitation, wage suppression, and persistent poverty.[7] Therefore, establishing robust accountability mechanisms is indispensable.

To this end, the Labour Reform Commission makes the following recommendations:

a. All factories and establishments must submit monthly wage payment data online to the Department of Inspection for Factories and Establishments (DIFE). DIFE shall implement the wage-related provisions in accordance with the labour law, while local government institutions, the Social Welfare Department, and district and upazila administrations shall provide support at the field level.
b) DIFE shall regularly publish national and sectoral data on wage implementation. Such data must be reviewed tripartitely (by government, employers, and workers) and used for taking prpoer measures.
c) The responsibilities of DIFE should include investigating wage-related complaints lodged by workers.
d) If there is a foreseeable likelihood of delayed wage payments, employers must notify both the workers and DIFE in writing within a reasonable time. Workers must be informed at least seven days before the legally mandated payment date. In such cases, DIFE shall mediate between worker and employer representatives to determine a revised payment date. If payment is not made within the revised deadline, a compensation rate of 0.5% per day (up to a maximum of 30 days) shall be applied.

e) If wage arrears persist beyond 30 days, the existing legal provisions shall be enforced accordingly.

3.2.8 Wealth Inequality and Just Share

Under the Bangladesh Labour Act, every company is required to allocate 5% of its net profit to the Workers' Profit Participation Fund, Welfare Fund, and the Bangladesh Labour Welfare Foundation Fund, in the ratio of 80:10:10 respectively. According to the law, every worker and employee is an equal beneficiary of the Workers' Profit

[7] International Labour Organisation. (2022). *Global Wage Report 2022–23: The impact of inflation and COVID-19 on wages and purchasing power.* Geneva: International Labour Office. Retrieved from /mnt/data/ILO%20Wage%20Report%202024.pdf

Participation Fund and is eligible to participate in it. However, employees who have not completed at least six months of service within a year are not entitled to participate in the fund for that year.

To ensure the participation of workers in enterprise profits, the Labour Reform Commission recommends the following:

a) The existing provision for workers' participation in profit-sharing should be retained and extended to all categories of workers employed in both commercial and industrial enterprises operating profitably. In this regard, it needs to be ensured that workers receive their rightful share under the law.

b) Due to the lack of clear regulations, issues of mismanagement and irregularities often arise in the administration and expenditure of enterprise-level welfare funds. Therefore, each enterprise's welfare fund must be governed by written and well-defined rules and procedures.

c) In the interest of transparency, the trustee board managing these funds must be granted full authority to verify all necessary financial records and documents related to the enterprise's profits and losses.

d) Specific legal and policy provisions should be formulated to promote productivity enhancement, skills and management development, and to ensure a just and equitable share of benefits among all stakeholders, including workers.

3.2.9 Industrialisation, Productivity, and Sustainable Business

Entrepreneurs often cite several challenges to the implementation of fair wages, including low worker skills, high production costs, low market prices of products, limited bargaining power with foreign buyers, and corruption. It is undeniable that informal financial costs, along with bureaucratic and administrative complexities, not only discourage informal businesses from entering the formal economy but also act as barriers to ensuring fair wages.Key factors contributing to high production costs include:

- a complex and burdensome tax structure,
- bureaucratic delays in approval processes,
- multiple layers of business registration and licensing requirements,
- difficulties in obtaining approvals without influence or informal payments, and
- inefficiencies within the supply chain.

To integrate productivity growth with the objectives of decent work, and in line with the ILO framework on Productive Employment and Decent Work, the Labour Reform Commission recommends the following measures:

a) National Level Measures

- Conduct a policy environment assessment to identify structural barriers to productivity growth, decent work, and sustainable enterprise development, thereby facilitating the digital and green transformation of the economy.
- Develop and implement comprehensive national strategies and policy reforms to enhance productivity, upgrade workforce skills, promote decent and gainful employment, improve workplace conditions, strengthen entrepreneurship and innovation, and support the transition from informal to formal economies.
- Strengthen meaningful social dialogue on issues related to productivity and decent work.

b) Sectoral Level Measures

- Undertake sector-specific assessments of production systems and formulate appropriate policies to promote structural transformation for higher productivity and improved employment.
- Address productivity and decent work challenges in priority sectors by:
    - improving the effectiveness of value chains, regulatory frameworks, and support services, and
    - strengthening sector-based social dialogue among stakeholders to enhance productivity and ensure the creation of decent employment opportunities.

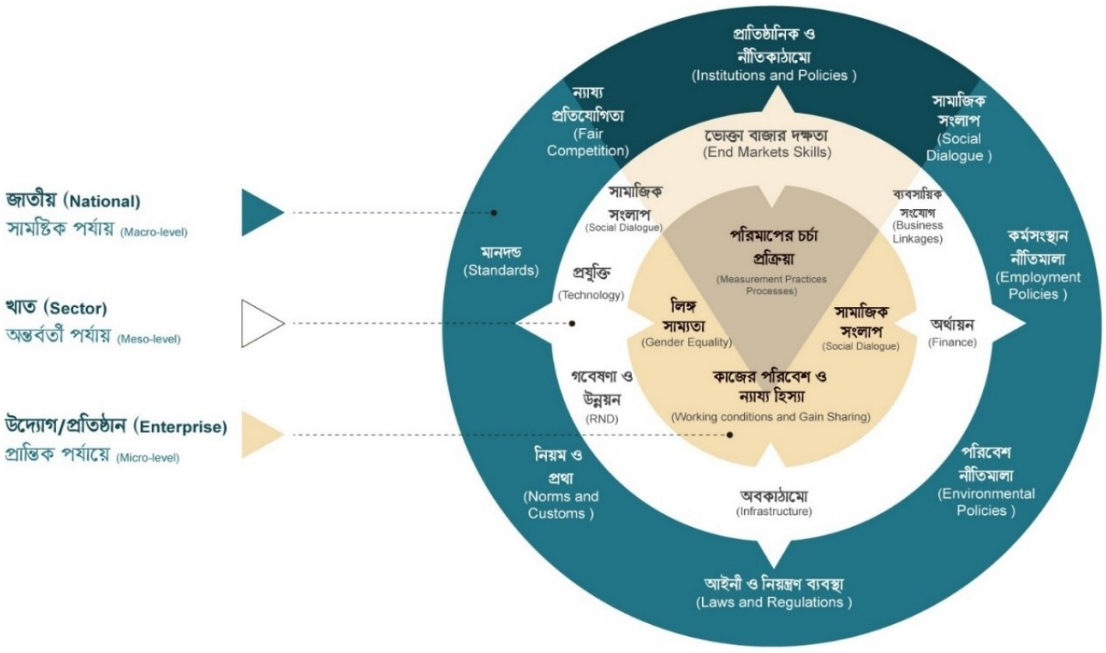


Figure 3.2.3: ILO-Developed Decent Work–Productivity Model

(c) Institutional Level Measures

- Undertake initiatives to improve management practices, enhance working conditions, strengthen meaningful social dialogue, increase resource efficiency, accelerate the transition to sustainable production, enhance business viability and continuity, and facilitate the formalisation of cottage and small enterprises, while ensuring the maintenance of minimum skill levels and economic efficiency.
- Undertake initiatives to promote the inclusion of workers in productivity enhancement for sustainable enterprise development.

(d) To reduce high production costs, the tax structure should be reformed in a way that decreases indirect taxation and aligns it more effectively with direct taxes. Import duties should also be rationalised to promote domestic industrial growth and attract foreign investment.

(e) Necessary steps should be taken to initiate the ratification of relevant ILO conventions concerning wages.

(f) To address bureaucratic delays and corruption, an effective one-stop service mechanism should be established which may simplify and expedite the complex, multi-layered procedures involved in business registration and operation.

(g) To remove inefficiencies in the supply chain, investment should be made in implementing digital systems and strengthening administrative capacity as recommended.

(h) The State should adopt balanced policies toward both employers and workers to encourage a positive shift in employer attitudes. Efforts to enhance employers' capacity and ensure fair wages must proceed simultaneously to break the existing cycle of low skills, low productivity, low wages, inequality, and instability.

(i) Fair wages must be recognised as a fundamental right and established as a national priority through strong political commitment.

3.3. Safe Work, Healthy Working Environment, and Workers' Health Services

Occupational safety and health (OSH) is a fundamental human right and it serves as the cornerstone of decent and dignified employment. The National Labour Policy 2012 of Bangladesh recognises that occupational safety and health must be considered an essential concern for all stakeholders, with its implementation ensured through the active participation of the government, employers, and workers alike.

The National Occupational safety and health Policy 2013 further emphasises the vital roles of trade unions, employers, and the government in promoting occupational safety health at the workplace. In addition, the Bangladesh Labour Act 2006 (amended in 2018) contains a number of

important provisions relating to the safety and health of workers. Chapters V to VIII of the Act provide detailed guidance on workplace safety measures, health standards, accident prevention, compensation for accidents, and medical facilities in the event of workplace injuries. The law also includes specific protections for female workers, such as maternity leave and restrictions on hazardous work during pregnancy, thereby strengthening the overall framework of worker protection.

At the International Labour Conference in 2022, occupational safety and health were formally declared as a fundamental principle and right at work. As a member state of the International Labour Organisation (ILO), Bangladesh is committed to upholding these principles and is therefore obliged to ratify and implement ILO Conventions No. 155 and No. 187, both of which are key conventions on governing occupational safety and health standards.

Furthermore, the International Covenant on Economic, Social and Cultural Rights (ICESCR) of 1966 acknowledges the right of every individual to just and favourable working conditions, including a safe and healthy working environment. The first joint session of the ILO and the World Health Organisation (WHO) in 1950 defined the objectives of occupational health, which were subsequently revised at the 12th session in 1995. The revised definition includes the following objectives:

(a) The promotion and management of the highest possible standard of physical, mental, and social well-being of workers in all occupations;

(b) The prevention of ill-health among workers arising from their working conditions;
(c) The protection of workers from risks resulting from adverse factors in the working environment;
(d) Provision of protection measures against adverse impacts on workers' health;
(e) Creation and maintenance of a safe occupational environment consistent with workers' physical and mental capacities.

Furthermore, Targets 8.8 and 3.9 of the Sustainable Development Goals (SDGs) set out commitments to ensure workers' safety and to reduce risks arising from environmental pollution and hazardous chemicals in the workplace, which the Government of Bangladesh has pledged to achieve by 2030. However, ensuring a safe and healthy working environment for workers across various sectors in Bangladesh remains a challenge. Significant safety risks persist in most informal sectors, as well as in construction, garments, leather, transport, and domestic work.

In many sectors, workers are compelled to work in unsafe and unhealthy environments, which have long-term adverse effects on their physical and mental health. Sanitation workers, care workers, domestic workers, construction workers, leather industry workers, port workers, transport workers, tea plantation workers, and ship-breaking workers regularly operate in hazardous and unsafe conditions where adequate protective measures are lacking.

3.3.1 Amendment and updating of the legal framework and policies on occupational safety and health to ensure universal safe work and a healthy working environment for all

To ensure universal protection under the framework of occupational safety and health (OSH), it is essential to introduce necessary amendments and updates to the existing legal and policy instruments. The Bangladesh Labour Act 2006 provides provisions in favour of implementing the right to occupational safety and health. In continuation of this, the Occupational safety and health Policy 2013, the Occupational safety and health Profile 2019, and the Plan of Action on Occupational safety and health (2021–2030) have been formulated and are under implementation. Despite these efforts, Bangladesh has yet to achieve satisfactory progress in preventing occupational accidents and diseases among professionals and workers.

Notably, neither the Occupational safety and health Policy 2013 nor the Bangladesh Labour Act 2006 provides a clear definition of "occupational safety and health ". The absence of a precise definition and clear guidance creates challenges in identifying workplace hazards and determining safe working conditions, making it difficult to align with international labour standards.

Under the Bangladesh Labour Act 2006, there is no provision allowing a worker to refuse work if they believe it poses a risk of death or serious injury. Although Schedule 4 of the Labour Rules 2015 empowers Safety Committees to prohibit hazardous work, there is no legal clause granting an individual worker the right to refuse unsafe work. Furthermore, due to the lack of a comprehensive classification of hazardous occupations across all sectors, the degree of risk cannot be accurately assessed.

In accordance with Section 323 of the Bangladesh Labour Act 2006, the government established the National Industrial Health and Safety Council in 2013. However, due to the absence of a realistic operational framework, the Council has faced challenges in achieving its objectives, alongside concerns regarding transparency and accountability. Additionally, Rule 55(12) of the Labour Rules 2015 mandates the appointment of a trained (safety) officer, but this provision focuses primarily on fire safety, which is insufficient for ensuring comprehensive occupational safety and health at the workplace.

In several sections of the Bangladesh Labour Act—including Sections 61(8), 89, 90, and 90(a)—the terms *labourer* and *employee* are used. However, the right to occupational safety and health applies to all persons engaged in work, regardless of employment classification. The restrictive use of these terms results in the exclusion of many categories of workers from the benefits and protections provided under the Act.

According to Section 90(a) of the Act, a "Safety Committee" must be formed in every factory or establishment employing 50 or more workers. However, establishments with fewer than 50 workers are not legally required to form such committees, resulting in the absence of safety oversight in a large proportion of small and medium enterprises. Likewise, there is no clear

guidance for forming safety committees on an area or cluster basis to cover groups of enterprises or industrial zones.

Sections 351 (Chapters V and VI) of the Bangladesh Labour Act 2006 empower the government to determine workplace standards, such as humidity levels, through subsidiary regulations. However, the lack of enforcement of these provisions continues to hinder the effective implementation of occupational safety and health measures. Workers engaged in hazardous occupations often suffer long-term health impacts and chronic illnesses, yet there is no provision for risk allowance within the Labour Act.

Harassment and violence against both male and female workers in workplaces remain common occurrences. In response to this global issue, the ILO adopted Convention No. 190 on the elimination of violence and harassment in the world of work on 21 June 2019. Considering the current context of Bangladesh and its membership in the ILO, the country bears a responsibility to ratify Convention No. 190 to address this critical concern.

In order to address this prevailing situation and to ensure a safe working environment for all, it is imperative to review existing legal frameworks, laws, and policies and to update the occupational safety and health regime by incorporating emerging issues. To this end, the Labour Reform Commission puts forward the following recommendations:

(a) Definition and Conceptual Clarity

- The Bangladesh Labour Act 2006 should be amended to include a clear definition of *occupational safety and health* and to revise related definitions accordingly. This will ensure that workers' rights to health and safety at work are upheld, and will promote a preventive and safe work environment, free from risks, accidents, and physical or mental illness.
- The law must guarantee proper medical treatment and fair compensation in cases of occupational diseases or injuries.

(b) Identification and Regulation of Hazardous Work

- The list of hazardous and unsafe occupations should be updated, and the Act be amended to strengthen provisions for hazard assessment.
- Workers must be granted a legal right to refuse unsafe or hazardous work.
- A risk assessment checklist or format should be incorporated into the Labour Rules, including items related to chemical management, waste management, and environmental hazards.
- These issues should also be included under Schedule 4 of the Labour Rules 2015.

- The Labour Act 2006 should introduce provisions for risk allowances for workers engaged in hazardous occupations, particularly for sanitation workers, and those involved in hospital waste, chemical, electronic, biological, and landfill management, as well as other high-risk sectors.

(c) Amendment and Updating of Provisions on Safety Officers and Safety Committees

- The threshold for forming a Safety Committee under Section 90(a) should be lowered from 50 to 20 workers.
- Factories or establishments with fewer than 20 (or even five) workers should designate at least two individuals (preferably one male and one female) who have received government-recognised training in occupational safety and health (offline or online).
- The Labour Rules 2015 should be amended to include provisions for forming area-based or cluster-based Safety Committees involving employers, workers' representatives, social stakeholders, and local community members.
- Rules 81, 84, and 85 of the Labour Rules 2015 should be revised to grant specific powers to members of Safety Committees to enable them to carry out their functions effectively, including in establishments employing fewer than 50 workers.
- Worker representatives on Safety Committees should be authorised to directly report hazards to labour inspectors, with or without their signatures.
- The role of contractors should be explicitly defined: any contractor employing workers on behalf of an enterprise must ensure that those workers receive occupational safety and health training, and OSH management should be recognised as an integral component under Rule 16(3) of the Labour Rules.
- The Occupational Safety and Health Management System—including policy formulation, planning, and implementation—should be incorporated into the scope of Safety Committee functions.
- The Labour Rules 2015, Rule 55(12), should be amended to replace the current "trained safety officer" with a qualified **Occupational safety and health Officer**.
    - This provision may apply to factories with fewer than 300 workers, as determined by the government.
    - The qualifications of an Occupational safety and health Officer should include:
        - A minimum bachelor's degree or diploma;
        - A 3-month formal training in occupational safety and health from a government-recognised institution or university, or completion of such

training within three months of appointment with employer's initiative and facilitation;

- Alternatively, completion of a three-week (six-credit) course in OSH with five years' experience, or 15–20 years of practical experience in occupational safety and health-related work.

(d) Inclusion of Agricultural Workers within the Legal Framework

- It is essential to incorporate agricultural workers, including those engaged in tobacco cultivation, within the national legal framework.
- A task force may be established at the upazila and district levels, comprising representatives from the Departments of Agriculture, Health, and Labour, to ensure effective supervision and prevent the use of banned chemicals in cultivation.

(e) Updating the Occupational safety and health (OSH) Profile, Policy and Plan of Action

- The Occupational safety and health policy must be revised and updated to address emerging challenges such as artificial intelligence (AI), digitalisation, online platforms, pandemics (including COVID-19 and other communicable diseases), and the impacts of global climate change.
- The OSH policy should incorporate the specific risk factors faced by young workers, agricultural workers, and those employed in sectors under the Fourth Industrial Revolution (e.g. AI, robotics, advanced machinery, gig work, and digital technology-based occupations).
- The existing Occupational safety and health Profile 2019 and Action Plan (2021–2030) must be reviewed and updated every five years. The implementation process should be accelerated, and contemporary issues such as Small and Medium Enterprises (SMEs), the Industrial Safety Unit (ISU), and the introduction of injury insurance schemes should be incorporated.
- To this end, the government should establish a technical and advisory committee responsible for providing methodological guidance and updating the action plan accordingly.

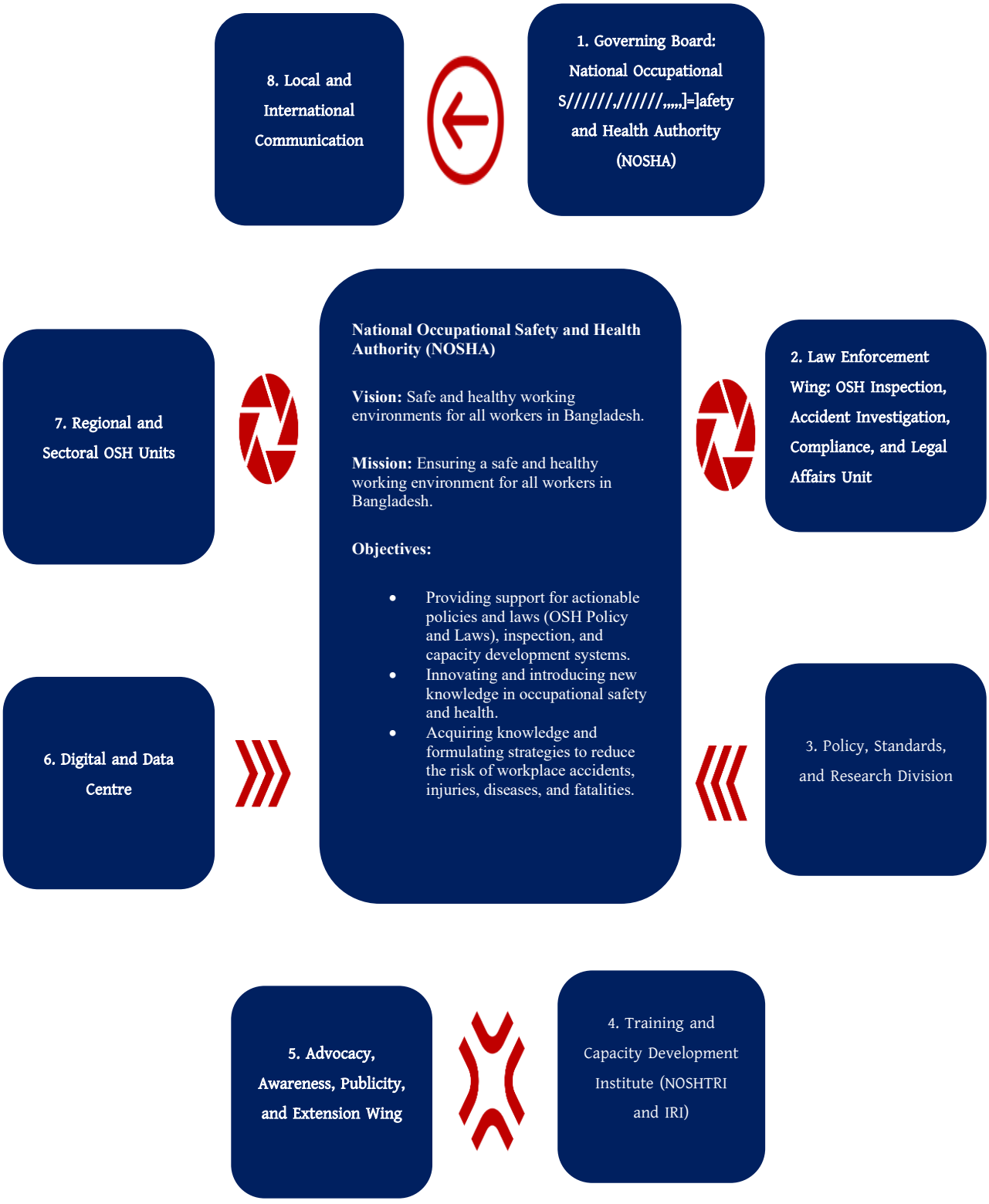
(f) Effective Operationalisation of the National Industrial Health and Safety Council

- A comprehensive and functional work plan should be developed to make the *National Industrial Health and Safety Council* fully operational. If necessary, sector-specific experts may be included as members of the Council.

- In line with Schedule 4, sector-specific inspection checklists on occupational safety and health should be developed under the *National Industrial Health and Safety Council* to strengthen monitoring and compliance.

(g) Enactment of a Separate Law on Occupational Health, Safety and Safe Work Environment

- Following necessary amendments to the existing legal framework, a separate and comprehensive law should be enacted on occupational health, safety, and the creation of a safe work environment.
- This law should be based on future-oriented assessments, research, and evaluation, ensuring the protection of workers' overall well-being — both physical and mental — across all sectors and professions.
- It should also address challenges arising from modernisation and technological transformation under the Fourth Industrial Revolution.
- In addition, separate Occupational Safety and Health (OSH) laws may be formulated for specific categories of workers where necessary, as part of a long-term legislative strategy.


8. Local and International Communication
1. Governing Board: National Occupational S//////,//////,,,,,]=]afety and Health Authority (NOSHA)
7. Regional and Sectoral OSH Units
National Occupational Safety and Health Authority (NOSHA)
Vision: Safe and healthy working environments for all workers in Bangladesh.
Mission: Ensuring a safe and healthy working environment for all workers in Bangladesh.
Objectives:
Providing support for actionable policies and laws (OSH Policy and Laws), inspection, and capacity development systems.
Innovating and introducing new knowledge in occupational safety and health.
Acquiring knowledge and formulating strategies to reduce the risk of workplace accidents, injuries, diseases, and fatalities.
2. Law Enforcement Wing: OSH Inspection, Accident Investigation, Compliance, and Legal Affairs Unit
6. Digital and Data Centre
3. Policy, Standards, and Research Division
5. Advocacy, Awareness, Publicity, and Extension Wing
4. Training and Capacity Development Institute (NOSHTRI and IRI)

(h) Establishment of an Occupational Safety and Health Administration/Authority

- To ensure effective implementation and monitoring of the Occupational safety and health (OSH) Policy, Laws and Regulations, and the National Action Plan (2021–2030), it is essential to establish an **Occupational Safety and Health Administration/Authority**.
- This Authority will strengthen accountability and transparency among institutions responsible for enforcing labour laws and protecting workers' rights.
- The establishment of this Authority is a long-term reform initiative.

(i) Ratification of Core International Labour Organisation (ILO) Conventions

- As a member state of the International Labour Organisation (ILO), Bangladesh should ratify the key OSH-related conventions, namely Convention No. 155 (Occupational Safety and Health, 1981) and Convention No. 187 (Promotional Framework for Occupational Safety and Health, 2006). Ratification would enhance governance and institutional management for ensuring occupational safety and health at the national level.
- In addition, to prevent violence and harassment in the world of work, the ratification of ILO Convention No. 190 is urgent and necessary.

3.3.2 Weaknesses in the Enforcement of Labour Laws and Labour Inspection, and Lack of Coordination among Relevant Agencies

A number of agencies are responsible for workplace safety in Bangladesh, including the Department of Inspection for Factories and Establishments (DIFE), Department of Labour, Fire Service and Civil Defence, Office of the Chief Inspector of Boilers, Department of Explosives, Ministry of Health, Department of Environment, Power Division, and the Ministry of Industries, among others. However, due to limited institutional capacity, inadequate human resources, outdated equipment and technology, and the absence of a coordinated and priority-based operational framework, achieving the goal of a safe working environment remains a challenge.

There is a lack of transparency and accountability in labour inspection activities, and no technology-based inspection mechanism exists across all sectors. Moreover, poor coordination among the concerned departments and agencies further undermines effective implementation. Each department currently uses its own checklist for inspection of factories and establishments to ensure occupational safety and health compliance. However, occupational safety and health require an integrated system. The absence of a coordinated inspection mechanism has hindered progress towards creating safe workplaces and protecting workers from occupational diseases and accidents. In particular, DIFE lacks separate or sector-specific OSH checklists, limiting its ability to identify occupational diseases and prevent workplace accidents.

Furthermore, following labour inspections, there is no provision for DIFE to issue official recognition or evaluation certificates to enterprises. As a result, workers and management remain uninformed about the actual status of OSH conditions in their workplaces. Currently, data on occupational diseases, illnesses, and accidents are published once a year in DIFE's inspection report, which is insufficient for effective policy monitoring and prevention.

To address these weaknesses and coordination gaps among labour law enforcement agencies, the Labour Reform Commission makes the following recommendations:

(a) Establishment of a Task Force and Implementation of a Coordinated Labour Inspection System

- A Task Force for Labour Inspection should be established to introduce a coordinated inspection mechanism involving multiple departments and agencies.
- A committee comprising representatives from relevant ministries, employers, and workers' organisations should be formed to oversee and guide the work of the Task Force.
- Joint inspection activities should be undertaken by the Chief Inspector of Boilers and DIFE, and the Office of the Chief Inspector of Boilers should be brought under the Ministry of Labour and Employment.
- This will be a medium-term initiative.

(b) Development of Sector-Specific Checklists and Introduction of Evaluation Certificates

- Sector-specific OSH checklists should be developed to facilitate more targeted implementation of occupational safety and health standards.
- A committee involving relevant stakeholders should be formed to update the existing labour inspection checklist.
- After each inspection, the inspected enterprise must be provided with a **report or evaluation certificate**, and measures should be taken to display it publicly.
- Inspection reports or evaluation certificates should also be published on the websites of the concerned enterprises and relevant authorities.

(c) Regular Reporting of Occupational Diseases and Accidents, Establishment of OSH Units, and Effective Implementation of Safety Committees

- Updated data on occupational diseases and accidents should be published on the DIFE website every 3 to 6 months.

- A dedicated Occupational safety and health Unit should be established within DIFE to implement OSH-related activities. Employers' organisations and trade unions should also establish OSH units in accordance with the Occupational safety and health Policy 2013.
- Effective implementation of Safety Committees must be ensured, and progress should be regularly published on the DIFE website.

(d) Implementation of Rule 75 of the Bangladesh Labour Rules, 2015 (Amended 2022)

- Rule 75 of the Bangladesh Labour Rules, 2015 (as amended in 2022) must be implemented effectively.
- A government notification should be issued incorporating provisions for penal measures to ensure compliance with this Rule.

3.3.3 Ensuring Implementation of National and International Standards of Workplace Safety, Hazard Identification, and Inclusion of Environmental Concerns

The Occupational Safety and Health Policy 2013 in Bangladesh sets out provisions for the development of occupational standards; however, these have yet to be effectively implemented. Moreover, the introduction of additional standards by foreign buyer companies has led industrial establishments to face various challenges and financial losses. Currently, occupational and safety-related standards are scattered across several legislative instruments, including the Bangladesh Labour Act 2006, Bangladesh EPZ Labour Act 2019, Bangladesh Environment Conservation Act 1995, Ship Recycling Act 2018, Fire Prevention and Extinction Act 2003, Bangladesh National Building Code 2020, Explosives Act 1884, and the Boilers Act 2022.

Across sectors such as ready-made garments, tanneries, dye manufacturing, fertiliser, pesticides, re-rolling mills, agriculture, pharmaceuticals, and other manufacturing industries, approximately 500 types of chemicals are used. Additionally, most industries operate without adequate preventive measures such as hazard identification, risk assessment, or risk management, exposing transporters, loaders/unloaders, and informal workers to severe health and safety risks. It is particularly concerning that Bangladesh currently lacks any designated government authority responsible for the legal oversight, monitoring, or evaluation of chemical imports, storage, and use. This regulatory vacuum has resulted in indiscriminate chemical use, posing risks to workers, the environment, and surrounding communities.

Moreover, Rule 68 of the Bangladesh Labour Rules 2015 lists hazardous occupations, yet new high-risk activities—arising from technological and industrial advancements—have not been incorporated into the legal framework.

To ensure that national and international safety standards are maintained, and that hazard identification and environmental concerns are integrated into workplace safety systems, the **Labour Reform Commission** makes the following recommendations:

(a) Development and Implementation of National OSH Standards and Management Systems

- A unified National Occupational Safety and Health Standard should be developed, aligned with international benchmarks and adapted for both sector-specific and cross-sectoral application. A committee comprising representatives from government, employers, workers, and subject experts should be established under the National Safety Council to lead this process.
- At the enterprise level, each establishment must implement an Occupational Safety and Health Management System that includes clear policy guidelines, operational processes, and assigned responsibilities. Relevant government agencies and authorities must regularly evaluate and report on the implementation status of OSH policy and management systems.

(b) Responsibilities for chemical and hazardous waste management, environmental degradation, updating of the hazardous work list, and inspection of chemical management

- Chemical management, waste management, and environmental risk factors should be included in inspection checklists, or annexed in the form of templates under Schedule 4(4) of the Bangladesh Labour Rules 2015.
- The list of hazardous occupations under Rule 68 should be updated to reflect contemporary industrial realities, and the revised list should be published on the websites of the Ministry of Labour and Employment, Ministry of Health and Ministry of Environment.
- A qualified government agency should be designated for chemical management and inspection, and its functions should be incorporated into Chapter VI of the Bangladesh Labour Act 2006.
- Unplanned and unsafe chemical use must be eliminated to prevent environmental pollution and protect the health and safety of workers and surrounding communities—including water, soil, air, livestock, fish, and agriculture.
- A national guideline should be developed to govern chemical safety, waste management, and environmental protection practices.

(c) Development of Sector-Specific Standard Operating Procedures (SOPs)

- Standard Operating Procedures (SOPs) must be developed for various sectors to operationalise occupational safety and health standards in alignment with national and international benchmarks.

3.3.4 Identification, Reporting, and Compensation for Occupational Diseases and Illnesses

The current state of occupational health in Bangladesh is fragile. While certain legal provisions exist, they remain inadequate. Consequently, occupational diseases among informal and agricultural workers often go unrecognised due to legal and institutional weaknesses. A major concern is the absence of reliable national data on occupational diseases and illnesses. A review of labour inspection reports (2019–2022) by the Department of Inspection for Factories and Establishments (DIFE) under the Ministry of Labour and Employment revealed no recorded data on occupational diseases.[8] The process for diagnosing occupational illnesses is complex and neglected. The National Health Policy 2011 makes no specific mention of occupational diseases.

Due to modern technology, machinery, and environmental changes, new occupational diseases are emerging. Yet, the absence of recognition for such illnesses as occupational hazards leaves workers vulnerable—denying them access to medical treatment and compensation. Currently, DIFE is primarily responsible for identifying occupational diseases, while the authority to officially declare a disease as occupational lies with the Civil Surgeon of each district. This bifurcated process creates delays and bureaucratic barriers, leaving affected workers without timely treatment or compensation.

Despite advancements in medical specialisation, Bangladesh lacks a dedicated occupational health department, specialised physicians, or laboratories. Industrial and labour-intensive areas also suffer from inadequate hospital facilities, depriving workers of even basic healthcare.

At present, the increasing complexity and diversification of work are giving rise to new health problems among workers and the employed population. Consultations with stakeholders indicate that excessive workload contributes to a range of mental and physical health issues among workers. Those engaged in prolonged standing or sedentary work experience fatigue, with an overall prevalence of 19.0% and an individual prevalence of 29.9%.[9] The absence of clear guidance on these issues in the Bangladesh Labour Act 2006 has led to a steady increase in workers' illnesses and physical health problems.

[8] Department of Inspection for Factories and Establishments (DIFE) https://dife.gov.bd

[9] Sarmin Sultana" Shanta Dutta' Rabeya Yasmin' SK Akhtar Ahmad' Shafiur Rahman Irin Hossain, MH Faruquee, Manzurul Haque Khan (2019), FATIGUE AMONG THE GARMENT WORKERS INA SELECTED INDUSTRY, Journal of Preventive and Social Medicine 38(1), November 2019, pp 45-53; Retrieved from https://www.researchgate.net/publication/337049033

In Bangladesh, there is no available data on the number of workers affected by occupational diseases resulting from the widespread use of chemicals in both formal and informal sectors. It is noteworthy that there are no dedicated clinics or hospitals for the diagnosis of occupational diseases related to chemical exposure.

To strengthen the system of diagnosing occupational diseases and disorders, establishing mechanisms for reporting diagnosed conditions to the appropriate authorities, and ensuring compensation for occupational illnesses, the Labour Reform Commission makes the following recommendations:

(a) Updating the list of occupational diseases, incorporating the identification process for mental health (stress), physical health (ergonomics)-related, and excessive working hour-induced illnesses, simplifying the reporting mechanism, and revising all relevant legal and institutional frameworks accordingly

- Updating or modernising the list of occupational diseases in the labour Act: The schedule of occupational diseases under the Bangladesh Labour Act 2006 (Schedule II) should be updated every 3–5 years, incorporating new risks arising from technological change, modern industrial practices, and infectious diseases such as COVID-19.
- Area-based health centres should be established for informal sector workers, and cluster-based health centres should be developed in industrial areas where enterprises employ fewer than 5,000 workers. Factories with 5,000 or more workers should comply with existing labour law provisions.
- Diseases related to mental health (stress), ergonomic strain, and excessive working hours should be incorporated into the Labour Act 2006 through appropriate amendments.
- The law should specify a clear process for identifying occupational diseases and introduce a simplified reporting mechanism through standardised forms annexed to the Act.
- The Bangladesh Labour Act 2006 and Labour Rules 2015 should include provisions for counselling services addressing mental health, harassment, and workplace violence, particularly for women workers.

(b) Establishment of Specialised Labouratories, OSH Units, and a Centralised Database

- A specialised labouratory and clinical unit under DIFE should be established, staffed with trained occupational health specialists.
- An additional specialised labouratory for occupational disease diagnosis should be set up under the National Institute of Preventive and Social Medicine (NIPSOM).
- All major public and private hospitals in industrial zones should establish specialised OSH clinics or units, maintaining close coordination with DIFE and the Department of Labour.

- Specialised clinics and hospitals should also be established for workers in shipbreaking, steel re-rolling, and chemical industries, with arrangements for treatment and follow-up.
- For stone-crushing workers, annual health camps should be organised jointly by the Department of Labour, Directorate General of Health Services, and DIFE, with mandatory legal provisions for diagnosis and compensation.
- A centralised database on occupational diseases and illnesses should be created under the National Occupational Safety, Health, Training, and Research Institute (NOSHTRI).

(c) Integration of Occupational Safety and Health into Medical Education

- Occupational safety and health should be introduced as a dedicated course or module within the MBBS and other medical curricula to develop specialised medical professionals.
- Nursing and medical technician training curricula should also include a separate chapter or course on occupational safety and health.

(d) Modernisation of Labour Welfare Centres under the Department of Labour

- Labour Welfare Centres under the Department of Labour should be modernised and adequately equipped with doctors, staff, and medical equipment to provide counselling and treatment for occupational diseases.
- These centres must ensure maternal healthcare facilities for women workers and access to essential medicines at fair prices.

(e) Inclusion of Hearing, Vision, and Disability Services

- Hearing impairment should be recognised as an occupational disease under Schedule II of the Bangladesh Labour Act 2006.
- Eye care and vision-related disorders should be legally recognised and incorporated into the list of occupational diseases.
- Institutional capacity should be strengthened to assess and address disability-related conditions arising from occupational hazards.

3.3.5 Accidents, Complaint Procedures, Compensation and Rehabilitation

According to a review of the report published by the Bangladesh Institute of Labour Studies (BILS) on occupational accidents, a total of 10,210 workers lost their lives in occupational accidents over the past twelve years (2013–2024). The Labour Inspection Report (2021–2022) of the Department

of Inspection for Factories and Establishments (DIFE), under the Ministry of Labour and Employment, recorded 146 fatalities resulting from occupational accidents. Furthermore, analysis of labour inspection reports from 2019–2022 indicates that 303 workers were killed in workplace accidents[10], with the number of fatalities increasing in 2021–2022 compared to the previous year.

At both national and international levels, occupational safety and health in Bangladesh's industrial sector came into sharp focus following the tragic collapse of the Rana Plaza complex in 2013, which claimed 1,134 lives. In response, the government enacted the Bangladesh Labour (Amendment) Act, 2013, and subsequently formulated the Bangladesh Labour Rules (BLR), 2015 to implement the provisions of the Bangladesh Labour Act, 2006. The Act was further amended in 2018, but despite repeated revisions, the desired objectives concerning occupational safety and health have not yet been achieved.

Although the Bangladesh Labour Act, 2006 includes legal provisions requiring the collection of data on minor and major workplace accidents, in practice, this is rarely done. Employers generally notify authorities only in cases of fatalities, while minor and serious accidents often go unreported and undocumented. Section 80 of the Labour Act 2006 does not provide workers or trade unions with a formal mechanism to directly lodge accident-related complaints, effectively preventing them from reporting incidents independently to the competent authority.

In Bangladesh, investigations were conducted into several major industrial accidents — including Sarakha Garments, Spectrum Garments, Rana Plaza, Tazreen Garments, Tampaco Foils, FR Tower, BM Depot, Sajeeb Foods, the Nimtoli Tragedy, Bailey Road Tragedy, and SN Corporation's Greenyard — by various governmental and non-governmental bodies. However, the findings of these investigations have never been made public. As a result, detailed data and statistics on damages remain unavailable, and recommendations for accident prevention have remained obscured.

It is worth noting that experience from incidents such as Rana Plaza and Tazreen Garments demonstrates that injured or disabled workers often face significant social and economic challenges in reintegrating into their communities and families, leaving them socially marginalised and helpless.

During the July 2024 uprising, 820 people were killed and 11,850 injured, among whom a significant proportion were workers.[11] Ensuring proper medical treatment and compensation for these affected workers is essential. According to Rule 70 of the Bangladesh Labour Rules, 2015, a worker's absence from work for 20 days qualifies as a "minor accident." However, this duration is excessively long, resulting in loss of income and job-related benefits for injured workers.

[10] Labour Inspection Report, 2019–2022, Department of Inspection for Factories and Establishments, https://dife.gov.bd

[11] July Shahid Smriti Foundation, 22 March 2025, Retrived from https://jssfbd.com

The compensation provisions under the Bangladesh Labour Act, 2006 are insufficient in the current socio-economic context. The post-Rana Plaza compensation process offered valuable lessons, and these experiences should guide the revision and strengthening of compensation provisions in the Act.

Accordingly, the Labour Reform Commission makes the following recommendations concerning occupational accidents, complaint procedures, compensation, and rehabilitation:

(a) Compensation Amount, Standards, Rehabilitation of Injured/Disabled Workers, and Accident Database

- Sections 150 and 151 of the Bangladesh Labour Act, 2006 should be amended to increase compensation amounts and incorporate specific provisions addressing these issues.
- Rehabilitation of disabled and incapacitated workers should involve social organisations and the community to provide social, financial, and training support, along with regular medical treatment and device replacement. Affected workers should be integrated into social safety net programmes, ensuring alternative employment, comprehensive rehabilitation, and lifelong access to quality healthcare and services.
- For workers killed or injured during the July 2024 uprising, the government must ensure adequate medical care and compensation, including the provision of health cards to guarantee free medical services in public and private hospitals.
- A centralised accident database should be established, maintained, and regularly updated under the National Occupational Safety and Health Training and Research Institute (NOSHTRI). This database must be publicly accessible to promote transparency.
- As the current compensation amounts are inadequate, a minimum compensation threshold should be introduced. A tripartite committee should determine compensation standards in line with ILO Convention 121 and recommendations of the High Court-constituted committee. To encourage legal recourse, court fees for compensation cases should be waived.

(b) Formation of an impartial and independent investigation committee for accidents, and the publication of an accurate and detailed report with recommendations.

- For all industrial and workplace accidents in Bangladesh, independent and impartial investigation committees must be formed to prepare accurate and comprehensive reports, including recommendations for prevention. These should be published on the websites of relevant authorities and disseminated through media outlets.
- The responsible institutions and departments must ensure timely publication of accident reports and data on official websites and enforce accountability measures where necessary.

(c) Integrated Inspection Mechanisms for Accident Prevention

- The Department of Explosives should be integrated into the labour inspection system to enhance coordinated oversight.
- Boiler inspection, supervision, and approval mechanisms must be strengthened through effective monitoring and enforcement measures.
- A coordinated inspection framework should be established for the shipbreaking industry.

(d) Inclusion of Fishermen, Construction Workers, and Farmers Affected by Lightning under the Legal Framework

- Fishermen must be brought under the legal protection framework to minimise occupational accidents. Adequate compensation mechanisms for the deceased, injured, or missing fishermen should be introduced.
- Farmers and rural workers who die due to lightning strikes or attacks by aquatic or wild animals should be recognised as victims of occupational accidents, with Section 150 of the Labour Act 2006 amended accordingly to include compensation entitlements.
- For construction workers, Sections 150 and 151 of the Labour Act 2006 should be amended to enhance compensation provisions and include special clauses addressing their specific occupational hazards.

(e) Accidents During Commute and Compensation Mechanisms

- The legal framework should include provisions for risk assessment and identification of hazards during commutes between home and the workplace.
- In cases where a worker suffers injury or death while travelling to or from work, such incidents must be recognised as compensable under labour insurance schemes and incorporated into the Bangladesh Labour Act 2006.

3.3.6 Ensuring Workers' Access to Standard Healthcare

Access to healthcare is a fundamental right of workers. To guarantee this right, it is necessary to conduct annual health check-ups for all workers. However, there is currently no legal obligation to conduct such examinations. Under the Bangladesh Labour Rules 2015, Section 68(5) stipulates an annual health examination only for workers engaged in hazardous operations; this requirement does not apply to all workers. Furthermore, Section 19(4) of the Rules does not include health examination as part of the employment contract information.

According to Clause 68 of the Bangladesh Labour Rules, 2015, he current legislation also does not mandate preventive measures to protect workers involved in hazardous operations from infectious diseases or occupational illnesses, thereby increasing the risk to those workers. Workers often

labour from morning to evening, while most hospitals are closed at night, making access to necessary medical care difficult.

To improve and ensure comprehensive healthcare for workers, the Labour Reform Commission recommends the following:

a) Provision of medical services

- Establish worker-friendly hospitals or satellite clinics in high-density industrial areas, allowing workers to access treatment at convenient times.
- Provide medical services and medicines at reasonable prices through labour welfare centres.
- Enrol workers under insurance schemes and provide identity cards to ensure access to healthcare.

b) Updating healthcare provisions through amendments to the Labour Rules 2015

- Introduce provisions for annual health check-ups for all workers in hazardous industries, and for other industries, conduct examinations at least once every 2–3 years. Measures must be taken to ensure the confidentiality of health examination reports.
- Implement, in accordance with Section 68(5) of the Bangladesh Labour Rules, 2015, preventive measures—such as hazard identification and risk assessment—to protect workers engaged in hazardous operations from infectious diseases and illnesses, and provide PPE as necessary.

3.3.7 Education, Training, Research, Data Management, and Monitoring in Occupational Safety and Health

The Occupational Safety and Health Policy 2013 mandates (Section 27) that educational curricula should include health and safety components. However, to date, no significant initiatives have been undertaken in this regard.

Currently, the Directorate of Labour under the Ministry of Labour conducts training programmes through industrial relations institutes to improve workers' knowledge and skills in occupational safety and health. These programmes, however, are limited in scope and inadequate for developing the necessary competence in OSH.

A key objective of occupational safety and health is to reduce occupational diseases by establishing preventive measures in the workplace. The absence of adequate data hampers the identification of occupational illnesses and the implementation of preventive and remedial measures. Furthermore, the lack of research-based evidence complicates policy decision-making.

To reduce occupational safety and health risks in the workplace, it is essential to develop a safety culture. A safe and decent working environment should be established through the implementation,

monitoring, and evaluation of education, training, awareness-raising, and other activities related to occupational safety and health. To this end, the Labour Reform Commission makes the following recommendations:

a) Enhancement of education, training, research, monitoring, and the establishment of a centralised database in occupational safety and health .

b) Integration of occupational safety and health education into curricula at secondary, higher secondary, university, and other educational institutions, alongside coordination and implementation of relevant programmes across government and private institutions. A committee comprising representatives from the Ministries of Education, Health, Environment, and the Labour and Employment should be formed to oversee this coordination.

c) Development of updated educational and training curricula on occupational safety and health in industrial relations training institutes (IRTIs), including specialised training programmes in collaboration with governmental and non-governmental institutions.

d) Establishment of a centralised occupational safety and health data repository and conduct of regular research under the National Occupational Safety, Health, Training and Research Institute (NOSHTRI).

e) Provision of higher education and professional training in occupational safety and health under NOSHTRI, including Masters programmes, diploma courses, and specialised training courses.

f) The provision of education and training on occupational safety and health for mid-level managers in all industries, factories, and establishments, and the introduction of comprehensive health and safety education.

g) Inclusion of occupational safety and health courses in technical training centre (TTC) curricula.

h) Monitoring, evaluation, and updating of all occupational safety and health education and training programmes, with the introduction of new initiatives as required based on assessment outcomes.

3.3.8 Occupational health and safety provisions applicable to specific and hazardous occupations, and the projects to be undertaken for their implementation

In Bangladesh, there are no clear directives within the existing legal framework on occupational safety and health (OSH) for workers engaged in special professions and hazardous or vulnerable occupations in the informal sector. Workers engaged temporarily or permanently, special occupational groups, vulnerable or specially-abled workers, occupations emerging due to new technologies or technological changes, and migrant or expatriate workers—all remain outside the scope of current labour policies, laws, rules, and action plans with regard to OSH. Furthermore, workers in the informal sector largely lack awareness and knowledge about hazard identification,

risk assessment, and OSH measures, while government and non-government initiatives in this regard remain significantly inadequate.

At present, there are approximately 500,000 salons and beauty parlours in Bangladesh, employing 2.5 to 3 million men and women, who serve millions of clients daily.[12] Due to the absence of adherence to proper OSH practices by both service providers and recipients, many are unknowingly exposed to various health risks. Similarly, around 400,000 waste collectors operate across the country, including about 120,000 in Dhaka alone, yet there are no legal provisions addressing their occupational safety and health in the Bangladesh Labour Act, 2006.

Bangladesh also generates around 3.2 million metric tons of e-waste annually. E-waste contains hazardous substances harmful to both the environment and human health. Approximately 120,000 vulnerable poor individuals, including 50,000 children, are engaged in informal e-waste collection and processing in Dhaka. However, the Bangladesh Labour Act, 2006 provides no explicit OSH guidelines for such workers.

There are 5,759,353 registered motor vehicles in Bangladesh[13], and apart from professional drivers, large numbers of battery-run auto-rickshaw, CNG rickshaw, van, and rickshaw drivers work without any formal inclusion in OSH-related legal and institutional frameworks. The Bangladesh Labour Act, 2006 does not cover them either.

To extend occupational safety and health protections to these special professions and hazardous labour groups, and to implement relevant projects, the Labour Reform Commission recommends the following:

(a) Inclusion of Workers in "Hazardous," "Special Needs," and Informal Sectors (including Outsourcing, Salons and Beauty Parlours, Small Footwear Industries, Waste Collectors, and E-waste Management) within the Legal Framework

- Since there are no OSH directives in the existing legal structure for workers in hazardous or special-needs groups and informal sectors, these workers must be brought under the legal framework to ensure their occupational safety and health.
- As outsourcing workers or those engaged in special occupations lack effective legal protection and targeted initiatives regarding OSH, specific provisions must be introduced, and tailored programmes should be implemented for them.
- Workers involved in waste collection and electronic waste management should be incorporated into the national legal framework to ensure their occupational safety and health.

[12] How the beauty industry is adapting to the new normal, Dhaka Tribune, 9 June, 2021_ https://www.dhakatribune.com/business/economy/249129

[13] Bangladesh Road Transport Authority, Annual Report 2022-2023https://brta.gov.bd

- Salon and beauty parlour workers, along with their clients, must be covered by legal provisions to ensure adherence to OSH standards.

(b) Project Development for Capacity Building, Skill Enhancement, and Awareness among Informal Sector and Migrant Workers

- Government and non-government projects should be initiated to enhance awareness, provide information, and improve understanding of OSH among informal sector workers.
- Pre-departure OSH training should be made mandatory for all migrant workers. Such training must include relevant OSH laws and regulations of the destination country to ensure preparedness and compliance abroad.

(c) Inclusion of Professional, Private, and Informal Drivers within the Legal Framework; Establishment of Health and Safety Mechanisms; and Creation of Funds to Address Accidents

- Professional drivers, private transport operators, personal chauffeurs, auto-rickshaw, drivers of CNG rickshaw, van, rickshaw etc. should be brought under the Bangladesh Labour Act, 2006, with inclusion in OSH-related provisions. In addition, initiatives should be taken to establish hospitals, health cards, terminal-based clinics, and to create funds to address accidents.
- A coordinated approach involving the government, employers, workers, and trade unions is essential to ensure the effective implementation of these measures.

3.4 Social Security and Welfare

Social security is a constitutional right of every citizen of Bangladesh. Article 15(d) of the Constitution stipulates that one of the fundamental responsibilities of the State is to ensure, through necessary and planned measures, the right to social security for its citizens—particularly in cases of unemployment, illness, physical disability, widowhood, orphanhood, old age, or other circumstances beyond one's control that lead to deprivation or destitution.

A key objective of the National Labour Policy is to establish a robust social security system for both domestic and migrant workers. The policy specifically prioritises workers' welfare, stating: "In the process of national economic development and productivity growth, the social security of the working class must be prioritised. Therefore, the Government shall remain committed to ensuring compliance with all provisions relating to the social security of workers and their families across public, private, formal, and informal sectors." The **Bangladesh Labour Act, 2006 (as amended in 2018)** includes specific provisions on social security, particularly regarding maternity benefits (Sections 45–50), compensation for workplace accidents or death (Sections 150–156), pension and provident funds (Sections 264–273), group insurance (Section 99), and gratuity (Section 2[10]). Similarly, the Bangladesh Labour Welfare Foundation Act, 2006 seeks to promote the welfare of workers and their families through various initiatives—financial assistance to disabled or incapacitated workers, medical support, compensation for workplace deaths, educational scholarships for meritorious children of workers, and the introduction of collective insurance schemes.

International Labour Organisation (ILO) Convention No. 102 (1953) sets out nine minimum standards of social protection, including: medical care, sickness benefit, unemployment benefit, old-age benefit, employment injury benefit, family benefit, maternity benefit, invalidity benefit, and survivors' benefit. Further conventions such as No. 121 (1964) on employment injury benefits, No. 128 (1967) on invalidity and old-age benefits, No. 130 (1969) on medical care and sickness benefits, No. 168 (1988) on unemployment protection, No. 183 (2000) on maternity protection, and No. 189 (2011) on domestic workers' protection outline member states' responsibilities to ensure adequate social security measures.

Despite these frameworks, Bangladesh's labour sector continues to face significant gaps in social protection and welfare. The absence of unemployment protection, risk allowances, medical facilities, workplace harassment prevention mechanisms, safe housing, sanitation and clean water, maternity leave, and insurance or savings schemes for future security makes the lives and working conditions of workers highly precarious.

3.4.1 Universal 'Life-Cycle-Based' Social Protection for All Workers

Social protection and welfare should be recognised as fundamental human rights of all workers. To this end, a comprehensive law should be enacted to ensure *life-cycle-based universal social*

protection for all categories of workers—formal, informal, self-employed, agricultural, and small or cottage industry workers. This framework should guarantee retirement benefits, accident compensation, support for disabled workers, protection against seasonal unemployment, maternity protection for all women workers, safe housing and transportation, and specialised healthcare and rehabilitation services.

To establish such a universal life-cycle-based social protection system, the Labour Reform Commission recommends the following policy measures:

(a) Policy Framework: A rights-based, life-cycle social protection system should be established to safeguard workers' employment, retirement, and post-retirement security, as well as the welfare of their families. To achieve this, a comprehensive Social Protection Act must be enacted for all categories of workers—formal, informal, self-employed, agricultural, and small or cottage industry workers. A mandatory Social Security Fund should be created, jointly contributed to by employers, the government, and workers.

(b) Coverage of Social Security and Welfare Programmes: Under the new legal framework, universal, life-cycle-based social insurance and protection schemes should be introduced, encompassing:

- Universal maternity protection and welfare,
- Unemployment protection during sudden job loss, and
- Access to medical and healthcare services.

These provisions must extend to all workers—formal, informal, self-employed, agricultural, migrant, freelance, and gig or platform workers. A "Survivor Benefit/Protection Bond" mechanism should also be introduced to ensure financial support for the victims or their dependents in case of a worker's death or permanent incapacity.

(c) Provisions for Formal Sector Workers: The law or policy should-

- Make Provident Funds mandatory in private enterprises, with workers' participation being voluntary;
- Allow transfer of Provident Funds when a worker changes employment;
- Introduce a worker-friendly scheme for the formal sector under the national pension scheme by integrating private sector enterprises, and provide special government incentives to participating enterprises;
- Introduce participatory schemes and insurance programmes for workers losing working ability, ensuring financial and medical assistance;
- Provide compensation to families in the event of workplace fatalities;

- Offer temporary unemployment benefits in case of sudden job loss;
- Guarantee universal maternity benefits, including at least six months' paid maternity leave, daycare facilities, and non-discriminatory workplaces for returning mothers.

(d) Provisions for Informal, Self-Employed, and Small & Cottage Industry Workers

The policy should ensure the inclusion of informal sector workers in social protection schemes through:

- Partial contribution to pension premiums by the government and employers for low-income workers;
- Introduction of short-term and long-term savings schemes for workers;
- Launch of life insurance programmes ensuring post-retirement healthcare and livelihood security;
- Creation of special pension schemes for informal and self-employed workers, which may be contributory, non-contributory, or voluntary depending on income levels;
- Joint contribution by the government and employers for marginal workers' pension premiums;
- Provision of incentives for small and cottage industries;
- Introduction of a dedicated insurance scheme for informal, self-employed, and cottage industry workers, providing financial assistance in cases of loss of work capacity, access to medical services, compensation for families in the event of work-related fatalities, medical insurance coverage, and maternity protection benefits;
- Payment of temporary unemployment allowances, with the government covering the insurance premium for marginal workers where applicable;
- Guarantee of at least six months' paid maternity leave and maternity allowances, financed jointly by government and employer-supported funds.

(e) Protection for Freelancers, Gig, and Platform Workers: A digital registration system should be established for informal workers, and their inclusion under pension, health insurance, and accident coverage schemes must be ensured. Gig and platform workers, including freelancers, need to be brought within the purview of national laws and regulations to ensure access to social protection, wage security, and labour rights.

(f) Social Protection for Migrant Workers

Bangladeshi migrant workers should be guaranteed internationally recognised social protection benefits, including pension schemes, insurance coverage, and rehabilitation support.

3.4.2 Workplace Accident Protection and Welfare

At present, compensation for workplace accidents remains inadequate, and the process for receiving it is often complex and lengthy. Except for the ready-made garment (RMG) sector, most industries lack access to injury insurance, leaving many workers uncompensated after accidents. Although accident insurance was introduced in the RMG sector in 2022, the absence of Employment Injury Schemes (EIS) in other sectors, coupled with limited awareness, has resulted in financial hardship for affected workers. When workers lose their earning capacity, both they and their families face extreme financial distress, heightened insecurity, and psychological pressure. Consequently, workers' living standards deteriorate, industrial stability weakens, investment faces obstacles, and the risk of losing skilled labour increases.

To ensure workplace accident protection and welfare, the Labour Reform Commission makes the following recommendations:

a) As current compensation levels are insufficient, the amount must be increased and a minimum threshold be established. A tripartite committee should determine the compensation standards in line with ILO Convention No. 121 and the recommendations of the High Court-appointed committee.

b) Workers need to be guaranteed access to medical care and long-term allowances following accidents or illnesses. In addition, it is necessary to provide lifelong medical treatment, maintenance, and rehabilitation to workers who become disabled or injured.

c) Accident insurance or an Employment Injury Scheme should be made mandatory for all sectors and all categories of workers, supported by necessary legislative amendments.

d) Children of workers who die or lose working capacity due to workplace accidents should be granted free education and training until they become capable of earning. Furthermore, a policy should be adopted to give priority in employment to family members of such workers.

e) It is necessary to introduce a digital application system for accessing the Workers' Welfare Fund and to introduce a tripartite audit and monitoring mechanism to ensure transparency and accountability in fund management. A central online portal should be established to manage welfare and insurance funds digitally. It is also necessary to ensure digital fund management with integrated application and tracking facilities. The Welfare Fund Management Committee and the Central Fund Management Committee should meet monthly instead of every three months. The scope of welfare benefits must be expanded to include all categories of workers—formal, informal, self-employed, and gig/app-based workers. The Labour Welfare Foundation Act should be amended to broaden assistance coverage for workers' families.

3.4.3 Protection from Unemployment and Sudden Job Loss

Workers in Bangladesh often face severe livelihood challenges due to natural disasters, climate crises, political unrest, and strikes. In the absence of dedicated support mechanisms, they fall into social insecurity, long-term unemployment, loss of savings, and indebtedness. Seasonal workers in agriculture and fisheries sectors experience recurrent joblessness. In regions such as haor wetlands, hilly areas, and fruit-growing zones, workers remain unemployed for up to five months during the monsoon, while fishers lose income during government-imposed fishing bans. Due to the lack of effective programmes and registration systems, these workers are often excluded from public assistance and alternative employment, trapping them in cycles of poverty.

Unstable employment among seasonal workers reduces their financial security and negatively affects education, health, and overall living standards. Prolonged unemployment slows economic growth, contracts domestic markets, and can lead to rising crime rates. Therefore, policies for skills development and rehabilitation of seasonal workers are urgently required.

To ensure protection from unemployment and sudden job loss, the Labour Reform Commission recommends the following:

a) Introduce programmes similar to the "100-Day Employment Scheme" to provide seasonal workers with work opportunity and financial security during seasonal unemployment. Public–private partnerships should be fostered to ensure sustainable employment for these workers. Modern data systems (as proposed by the Commission) should be utilised to simplify and enhance recruitment processes.

b) Offer vocational and demand-oriented training aligned with labour market needs to enhance skill development and re-employment opportunities for seasonal workers. Training must emphasise modern technologies and innovative skills, with active participation from local government institutions. Establishing training centres in rural and disadvantaged areas should be prioritised. A long-term programme for skills development and worker reintegration needs to be implemented. It is also necessary to establish a dedicated monitoring and evaluation cell to oversee training activities and assess outcomes.

c) The national budget should allocate specific resources for employment programmes targeting seasonal and unemployed workers. Local government institutions should lead the preparation and regular updating of worker registries. Collaboration among Union Parishads, municipalities, and NGOs should be established and strengthened to help implement employment initiatives more effectively.

d) A special fund, jointly financed by public and private sectors, should be established to provide stipends or allowances to workers undergoing training or vocational education for a specific period.

e) A Social Protection Act, as proposed by the Commission, should be enacted to introduce an Unemployment Benefit Scheme. A dedicated fund must be created to ensure a minimum level of livelihood security for workers during periods of unemployment. The fund should be jointly financed by employers, workers, and the government, with allocations made in the national budget. The proposed Department for Workers' Social Security and Welfare under the Ministry of Labour and Employment would be responsible for administering the unemployment benefit scheme.

3.4.4 Maternity Protection and Welfare

In Bangladesh, women workers employed in the formal sector enjoy limited maternity protection, while domestic workers, agricultural labourers, and workers in small industries are largely excluded from such benefits. The absence of maternity leave prevents women from obtaining essential rest and care, increasing health risks for both mothers and newborns. The lack of paternity leave affects the psychological development of children and disrupts family balance. Without financial protection, workers experience severe economic hardship during maternity, which undermines their standard of living and places additional strain on the family. Moreover, inadequate social security diminishes workers' dignity, and many women lose their economic independence when they cannot re-enter the workforce.

To ensure maternity protection and welfare, the Labour Reform Commission recommends the following:

a) A universal entitlement to at least six months of paid maternity leave must be guaranteed for all workers. For formal sector workers, where employers may face financial constraints, the existing four months of paid leave under the Labour Act should be supplemented by financial security for the remaining two months through the Central Fund or other government social protection schemes.

b) For workers in the informal sector, small and cottage industries, and self-employment, a structured framework for maternity protection should be developed through collaboration among employers, the Labour Welfare Foundation, and social assistance programmes. The coverage and level of benefits under existing government social assistance programmes should be expanded to enhance the provision of protection.

c) The duration of paternity leave should be determined in accordance with international standards.

d) Maternity protection for workers in the informal sector, including freelancers, must be ensured through social insurance mechanisms.

e) A flexible and supportive working environment must be established for women during pregnancy and the postnatal period. This should include provisions such as an additional optional two-year unpaid leave, exemption from overtime work, flexible working timetable, and adequate rest periods during working hours.

f) The Bangladesh Labour Act and Labour Policy should incorporate explicit provisions and guidelines related to flexible working arrangements.

3.4.5 Retirement and Future Security

The Universal Pension Scheme represents an important social protection initiative for workers. However, its effectiveness is hindered by limited inclusion of informal workers, low awareness, financial constraints, and administrative complexities. Many low-income workers are unable to make regular contributions and therefore remain outside the scheme. The absence of sports, library, cultural, and volunteer activities adversely affects workers' mental health and social integration. Lack of post-retirement recreational opportunities also undermines family well-being and reduces productivity. According to the Labour Force Survey, Bangladesh has 70.98 million workers, yet only 4.9% of government employees receive provident fund and gratuity benefits.[14] The remaining 95% of workers are excluded from such support, leaving them financially insecure and exposing their families to future economic vulnerability.

To ensure retirement and future security, the Labour Reform Commission recommends the following:

a) A worker-friendly pension scheme should be introduced under the National Pension Scheme, with the government contributing to workers' accounts. A minimum guaranteed pension along with government assistance should be established for workers living below the poverty line. A digital registration system and a centralised pension platform must be developed to facilitate easy enrolment and benefit claims. Establishment of regional pension offices and a dedicated monitoring unit is also required.

b) An independent committee should be formed to resolve disputes related to pension funds, ensuring transparency and accountability. Legal provisions should be enacted to guarantee workers' access to legal aid and to simplify the grievance redress process. A Labour Welfare Ombudsperson should be appointed and under his administration an independent body should be established to oversee social protection and welfare management of the workers. A helpline or toll-free service should be established for lodging complaints, with clear time limits and penal measures for delayed resolutions. Pension management and application procedures must be digitalised to enable workers to update their information, make contributions, and submit claims easily. A monitoring unit should be formed to oversee pension fund management and grievance mechanisms, supported by tripartite oversight to prevent irregularities.

[14] Bangladesh Bureau of Statistics. (2024, May 6). Quarterly Labour Force Survey (QLFS) Q4:2024. Bangladesh Bureau of Statistics. Retrieved from https://bbs.portal.gov.bd/sites/default/files/files/bbs.portal.gov.bd/page/57def76a_aa3c_46e3_9f80_53732eb94a83/2024-05-06-06-58-10aa7c13d49318982373a0f47252ae5f.pdf

c) A robust audit mechanism should be instituted for pension fund utilisation. Each industry should establish a grievance committee comprising representatives from employers, workers, and government. Strict penalties for corruption and regular monitoring and auditing must be enforced. A Pension Audit Commission could be established to ensure transparency. A national social dialogue forum should be established to facilitate tripartite agreements among employers, workers, and the government, and to ensure the implementation of pension policies. Active participation of trade unions should be encouraged to ensure workers' rights and benefits are upheld.

d) A policy should be developed for post-retirement recreation, and sports and cultural centres should be established at the local level and industrial belts with government support.

3.4.6 Protection of Workers' Families and Children

Low-income workers in Bangladesh face increasing hardship due to rising living costs and wage disparities. In the absence of effective market regulation and rationing systems, ensuring their basic rights and welfare has become difficult. Without educational stipends, the children of low-income workers are deprived of access to quality education. The commercialisation of the education and health sectors is depriving workers of access to quality education and healthcare, despite these being constitutionally guaranteed rights.

To ensure the protection of workers' families and children, the Labour Reform Commission makes the following recommendations:

a) Ration shop facilities should be introduced at the ward or union level in both industrial and rural areas. A card-based rationing system should be implemented to allow workers to purchase food and essential commodities at fair prices. In addition, subsidised food support linked to wages should be ensured.

b) Until a permanent rationing system is in place, the availability of essential goods must be ensured through Open Market Sales (OMS) in factories and industrial zones.

c) A policy for educational stipends for children of low-income workers must be formulated, with specific budgetary allocations. The amount of scholarship facilities from primary to higher education should be enhanced, ensuring that a fixed quota of students in quality educational institutions comes from workers' families. The cost of their education should be jointly borne by the government and educational institutions.

d) Vocational, technical, and work-oriented education programmes should be introduced for workers' children to develop their skills and enhance employment opportunities.

3.4.7 Day-care Facilities

The lack of day-care and breastfeeding corners in labour-intensive areas poses a significant challenge for working mothers and their children. Many women are compelled to leave their jobs due to the pressures of childcare, undermining their economic independence and professional growth. The shortage of community-based day-care centres, high costs, and lack of awareness restrict women workers' participation in the labour force. This deficit adversely affects industrial growth, employment generation, national human resource development, and economic growth.

To ensure day-care facilities, the Labour Reform Commission makes the following recommendations:

a) Provisions must be introduced to make day-care centres mandatory at all workplaces and area levels, with necessary amendments to existing laws. A "Day-care Facility Policy" should be formulated to incorporate day-care requirements into the Labour Act and related policies, providing clear guidance for establishing and operating workplace day-care centres.

b) In addition to factory- or enterprise-based day-care facilities, community-based day-care centres should be established in industrial zones and residential areas of workers through public–private partnerships.

c) Local government institutions should allocate special funds in their budgets to support community-based day-care centres at the local level.

d) A coordinated institutional framework should be developed involving the Ministry of Labour and Employment, the Ministry of Women and Children Affairs, the Ministry of Local Government, Rural Development and Cooperatives, and the Ministry of Social Welfare for the supervision and management of day-care centres.

3.4.8 Health Protection

The absence of specialised hospitals and healthcare services for workers in industrial zones remains a serious concern, particularly for women. Due to the lack of health insurance, workers often face severe financial hardship and, without access to rehabilitation, repeatedly engage in hazardous work—damaging their long-term physical and mental health. As a result, productivity declines, negatively impacting national output. Inadequate compensation, rehabilitation, and family support mechanisms for injured workers further diminish their quality of life and work capacity.

To improve workers' health protection, the Labour Reform Commission recommends the following:

a) Dedicated hospitals should be established in industrial areas to provide appropriate treatment, medical advice, and healthcare services to workers. These hospitals should offer **free evening-**hour services to meet workers' needs.

b) Each labour welfare centre should have qualified doctors and health counsellors to diagnose occupational diseases, offer mental health support, and provide necessary treatment. Adequate provisions must be made for female doctors, nurses, and support services for women workers.

c) A "Worker Health Card" should be introduced to protect workers' health, enabling them to access and utilise their health information and entitled benefits. Additionally, a 24-hour toll-free telemedicine service should be established to provide immediate medical consultation, especially for primary health concerns.

d) Dedicated mental health support services should be provided for workers, including counselling and expert assistance for stress, anxiety, and other psychological issues.

e) A "Health Savings Scheme" should be launched to encourage workers to save for future healthcare needs. Affordable health insurance schemes should also be introduced to enable workers to get quality healthcare at minimal cost.

f) Workers injured in occupational accidents must receive timely compensation and rehabilitation support to ensure safe and sustainable re-employment.

3.4.9 Protection of Workers with Disabilities

In Bangladesh, facilities and support systems for workers with disabilities remain inadequate. The Department of Inspection for Factories and Establishments (DIFE**)** lacks specific directives in its inspection checklist to ensure accessibility for disabled workers, resulting in insufficient workplace accommodations. The absence of training, counselling, and supportive work environments makes professional life more challenging for persons with disabilities. Medical and rehabilitation opportunities for workers disabled by accidents are limited, preventing their return to work. The lack of necessary workplace facilities, accessibility, and support prevents them from sustaining long-term employment, thereby undermining their income security and social stability and increasing the economic burden on their families.

To ensure the protection of workers with disabilities, the Labour Reform Commission recommends the following:

a) Necessary amendments should be made to the Labour Act to guarantee the rights of disabled workers. These include:

- Clear provisions to ensure workplace accessibility and a supportive environment;
- Inclusion of specific criteria for workers with disabilities in the DIFE inspection checklist;

- Special provisions in the Social Protection Act guaranteeing lifelong treatment and rehabilitation in cases of accident-induced disability;
- Special benefits for disabled workers under the Labour Welfare Fund; and
- Introduction of a social protection scheme to guarantee lifelong healthcare and rehabilitation for workers experiencing accident-induced disability.

b) Social dialogue among employers, workers' organisations, and the government must be strengthened to promote training and rehabilitation programmes. The responsibilities of both the government and employers in the rehabilitation of accident-disabled workers must be ensured.

3.4.10 Workers' Housing

The lack of safe and affordable housing forces workers to live in unsafe and unhygienic environments, negatively affecting their physical and mental well-being as well as productivity. Limited public and private housing projects fail to meet workers' needs, particularly at the district level where the situation is more acute. The absence of housing facilities for retired and disabled workers increases their financial and social insecurity. Inadequate investment and weakness in policy hinder sustainable housing initiatives for workers, adversely affecting both industry and the economy. Poor housing conditions also contribute to absenteeism and high turnover, disrupting industrial stability and growth.

To ensure adequate housing for workers, the Labour Reform Commission recommends the following:

a) A "Workers' Housing Policy" should be formulated recognising housing as a fundamental right of the Workers. Public–private partnership models should be made mandatory to implement affordable housing projects in industrial and labour-intensive areas.

b) The National Housing Policy should be amended to include provisions ensuring government-led housing and welfare facilities for elderly, retired, and disabled workers in every district.

c) A "Workers' Housing Fund" should be established to promote affordable housing for all workers. Budgetary allocations should be increased to support low-interest home loans, housing subsidies, and housing development funds. Banks and financial institutions should be encouraged to offer low-interest housing finance. Incentives should be provided to industrial owners for facilitating workers' housing, supported by an appropriate policy framework.

d) A central regulatory body should be established to oversee the implementation of workers' housing initiatives. A coordinated plan must be developed among the Ministry of Labour and Employment, the National Housing Authority, and relevant agencies.

3.4.11 Protection and Welfare of Migrant Workers

Families of migrant workers who die abroad often face severe financial crises due to inadequate compensation, while injured workers are deprived of medical care and re-employment due to weak rehabilitation system. Between 2008 and June 2022, a total of 45,301 deceased migrant workers were repatriated to Bangladesh, 63% of whom came from Gulf countries.[15] The inability to bear educational and medical expenses, coupled with psychological distress, social isolation, and despair, further worsens their living conditions. Injured workers become dependent on their families and lose the opportunity to lead dignified lives. The lack of employment opportunities for returnee workers—both able and injured—intensifies frustration and exerts negative impacts on the family and the society.

To ensure the protection and welfare of migrant workers, the Labour Reform Commission recommends the following:

a) Appropriate legislation should be enacted to make compensation mandatory for the families of deceased migrant workers. Medical treatment, psychological support, and rehabilitation programmes should be ensured for defrauded and injured migrant workers, utilising unspent insurance funds held by state-owned institutions established from migrant insurance income, on a non-profit basis.

b) Mandatory life insurance should be introduced for all migrant workers to ensure compensation for families in the event of accidents or death. For returnee workers (both able-bodied and injured), comprehensive training, skills development, microcredit, and rehabilitation programmes should be implemented to reintegrate them into the national economy, with priority access to employment opportunities.

3.4.12 Awareness about Social Protection and Grievance Redress

Under the Ministry of Labour and Employment, a dedicated unit or cell shall be established within the proposed Department of Workers' Social Security and Welfare, as recommended by this Commission. The unit/ cell will be responsible for undertaking awareness-raising activities among employers and workers on issues related to social protection, as well as for the receipt and resolution of grievances concerning social security matters.

[15] The Daily Star. (2024, May 6). The sickening silence over Bangladeshi migrant worker deaths. The Daily Star. Retrieved from https://www.thedailystar.net/opinion/views/news/the-sickening-silence-over-bangladeshi-migrant-worker-deaths-3198546

3.5 Right to Organise, Participate, Represent, and Bargain Collectively

The freedom of association is a fundamental right of every citizen. Article 38 of the Constitution of Bangladesh guarantees this right, stating that *"Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order."* The right to organise, bargain collectively, and participate in representation is recognised as a core principle of the ILO's Fundamental Rights at Work, serving as a foundation for maintaining industrial peace, fostering sound labour relations, promoting a dynamic and balanced society, and ensuring social justice and democratic participation. To establish a fair and equitable labour system, workers must have the right to organise, express their views, and engage in collective bargaining with employers without obstruction. Beyond its legal necessity, this is also a moral obligation essential for upholding justice and protecting workers' dignity.

One of the key objectives of Bangladesh's National Labour Policy is to establish decent work in both formal and informal sectors, in alignment with international labour standards. A fundamental condition of decent work is workers' representation. The National Labour Policy places strong emphasis on the right of workers to organise, stating that, "Healthy and responsible trade unions or workers' welfare associations play an important role in establishing social justice by promoting industrial peace and stability, protecting the legal rights of workers, and reducing income inequality. The Government shall play an appropriate role in encouraging the activities of trade unions/workers' welfare associations (formation, negotiation, and dialogue) under the Constitution of the country, the Labour Act, the ILO, and other international conventions (13.01. Formation, Negotiation, and Dialogue of Trade Unions/Workers' Welfare Associations)." Provisions regarding the right of workers to organise, that is, trade union rights and their activities, have been incorporated in the Bangladesh Labour Act, 2006.

The ILO Conventions No. 87 (Freedom of Association and Protection of the Right to Organise, 1948) and No. 98 (Right to Organise and Collective Bargaining, 1949) are key international instruments protecting workers' and employers' rights to freely form organisations and engage in collective bargaining. Article 3 of Convention No. 87 guarantees the autonomy of workers' and employers' organisations to draw up their constitutions, elect representatives, and manage their activities without interference from public authorities. Article 5 affirms their right to establish federations and confederations and to affiliate with international organisations, promoting global solidarity and cooperation. Convention No. 98 further protects against anti-union discrimination and upholds the right to collective bargaining.

Under the ILO Convention No. 189 (Decent Work for Domestic Workers, 2011), member states are required to ensure the effective recognition of domestic workers' and employers' organisations, and their right to establish and join organisations, federations, and confederations of their choice. Similarly, the 1990 International Convention on the Protection of the Rights of All Migrant

Workers and Members of Their Families (Article 26) recognises migrant workers' rights to join trade unions.

The Sustainable Development Goals (SDGs)—particularly Goal 8 (*Decent Work and Economic Growth*)—emphasise the need for full, productive employment and decent work for all. Within this framework, the protection of workers' rights and the promotion of social dialogue and trade union activities are central to achieving sustainable and inclusive economic growth.

The ILO Decent Work Country Programme (DWCP) Bangladesh 2022–2026 plays a significant role in advancing trade union rights. Its strategic priorities include strengthening labour governance, improving labour rights and standards, and enhancing opportunities for social dialogue. It seeks to monitor and promote the implementation of ILO Conventions, particularly to protect workers' rights and strengthen trade union capacities. A key objective of this programme is to establish effective mechanisms for collective bargaining and tripartite consultation, reinforcing cooperation among workers, employers, and the government.

Despite Bangladesh's ratification of ILO Conventions Nos. 87 and 98, workers continue to face substantial obstacles in forming and registering trade unions, as well as in exercising collective bargaining rights. Only about 15 per cent of the national labour force is employed in the formal sector, and many of these workers are excluded from trade union rights due to their job designations. Moreover, under the existing labor law, there are restrictions on operating as a union without registration, which is constraining workers' right to organise. The requirement that a trade union must represent at least 20 per cent of workers in an enterprise or 30 per cent in an industrial group is not consistent with international labour standards and poses significant challenges to registration.

Administrative and procedural complexities within the Department of Labour make union registration even more difficult—for instance, verifying attendance at general meetings, authenticating signatures, and certifying worker numbers and eligibility. Since workers have no legal mechanism to access accurate data on workforce size, such requirements often lead to delays and rejections. The Department of Labour exercises its power of *discretion and good faith* in a way that makes the formation of trade unions more difficult.

Another major obstacle is the lack of protection for trade union officials. Section 26 of the Labour Act 2006 grants employers unilateral authority to terminate workers' employment, while Section 180 disqualifies individuals from union leadership if they are no longer employed at the enterprise. As a result, union organisers face constant job insecurity and risk losing their leadership roles upon dismissal, which undermines the free and fair exercise of the right to organise.

3.5.1 Universal Right to Organise and Inclusion

The rights to freely associate, participate in workplace decision-making, be represented, and engage in collective bargaining are fundamental human rights, affirmed by the Universal Declaration of Human Rights (UDHR), the core ILO Conventions, the International Covenant on Economic, Social and Cultural Rights (1966), the Constitution of Bangladesh, and the Bangladesh Labour Act. According to the ILO Social Dialogue Indicators, every worker—regardless of employment status, occupation, or designation, including the self-employed and day labourers—must have the opportunity to participate in representation, collective bargaining, and social dialogue with employers and relevant authorities on matters related to their professional interests.

To ensure the universal right to organise and inclusion, the Labour Reform Commission recommends the following:

a) The right to form or join trade unions, to be represented, and to participate in collective bargaining must be guaranteed for all workers in Bangladesh, irrespective of sector, industry, or employment type—formal or informal, profit or non-profit.

b) Legislation must guarantee all workers—formal and informal—the right to bargain collectively, represent their individual and collective interests, and participate in advocacy and social dialogue with employers, government agencies, and local authorities. Necessary amendments to the Labour Act should be made to remove all barriers and strengthen the enabling environment for exercising and protecting the right to collective bargaining.

3.5.2. Proposal for an Integrated and Inclusive Trade Union Structure

Recognising the diverse realities of employment, it is imperative to establish an integrated and inclusive trade union framework that ensures the right of all workers to organise and engage in collective bargaining. The distinction between formal and informal workers should never be a barrier to unionisation. To guarantee full representation of workers and strengthen labour protection, the Labour Reform Commission proposes the following union structure:

(a) Union Formation in the Formal Sector

- **Single Enterprise-Based Unions:**

  It is important to ensure the establishment of separate unions for workers employed in specific enterprises.

- **Inclusion of Contractual and Outsourced Workers:**

  Workers engaged through contractors within an enterprise shall have the right to form or join a union. They may also join the union established in the contracting agency or

company. This ensures that subcontracted workers are not excluded from union representation and labour protection.

(b) Formation of Unions at the Level of Group of Establishments

- Workers employed across multiple enterprises within a specific industry or geographic area should have the right to form a union.
- A union formed for a group of establishments shall have the right to bargain collectively with the corresponding employers' association of that group and to engage in grievance resolution and bargaining on behalf of members employed in individual establishments within that group.

(c) Unionisation Rights for Specific Categories of Workers

Certain categories of workers—such as sales representatives employed across different enterprises—should have the right to form enterprise-group-based unions. In such cases, these workers should also retain the right to form or join a union at their individual workplaces.

(d) Union Formation in the Informal Sector

Workers in the informal economy—who are not formally recognised as employees—should have the right to form unions to protect their collective interests. Informal workers are often excluded from conventional labour protection and collective bargaining processes. Therefore, a legal framework recognising their right to unionise has become essential. The following categories of workers and actions are particularly relevant:

- **Domestic Workers and Personal Assistants:**

  Given the diversity of working environments—such as domestic helpers, gardeners, personal drivers, and assistants to professionals (e.g., doctors, lawyers)—these workers must be allowed to organise, form unions, and engage in negotiations for fair wages, workplace safety, and social protection.

- **Casual and Temporary Workers:**

  Workers employed on a casual or daily-wage basis should have the right to form unions to demand fair wages, job security, better working conditions, and access to social protection.

- **Street Vendors and Self-Employed Workers:**

  Self-employed individuals should have the right to organise and form organisation to demand protection from forced eviction, fair municipal regulations, legal assistance, and social protection.

- **Transport Workers:**

Informal transport workers—including rickshaw pullers, ride-sharing drivers, private chauffeurs, and delivery personnel—should have the right to unionise to advocate for fair treatment, safe working conditions, regulatory protection, and access to social safety measures.

- **Agricultural Workers (Outside Organised Farms):**

  Many agricultural labourers work outside structured farms—such as seasonal workers, sharecroppers, or independent cultivators. They should have the right to unionise to secure fair wages, land rights, protection from exploitation by intermediaries or landlords, and access to social security benefits.

(e) Union Formation by Self-Employed Workers

- Gig workers, freelancers, artisans, and independent contractors should have the right to form unions or associations representing their collective interests.
- These unions should be able to advocate for fair regulations, social protection, and equitable working conditions, including minimum income guarantees, access to health benefits, and protection from unfair contractual arrangements.
- Such unions should have the right to form national federations—sector-based national federations of self-employed workers—under conditions prescribed by law.
- Self-employed workers should have access to social protection schemes, including pension funds, health insurance, and emergency financial support.

(f) Union Formation by Professionals

- Professionals such as teachers, doctors, engineers, agriculturists, artists, and trainees/junior officers employed in banks, insurance, or IT companies must have the right to form unions and engage in collective bargaining to address their specific occupational and sectoral concerns.
- These unions should be able to operate both nationally and regionally, with the right to establish national federations.
- In addition to sector-based unions, professionals should retain the right to form or join unions within their own workplaces.

3.5.3. Protection of Unions During the Organisation Phase

Recognising the fundamental right of workers to organise, workers must be fully protected in forming and conducting union activities. They should not be subjected to arbitrary restrictions, dismissal, or harassment. To this end, relevant provisions of the labour law must be updated—by

amending the existing Standard Operating Procedures (SOPs)—to clarify and strengthen the legal authority of the Department of Labour (DoL). The DoL must be empowered to take effective action to prevent anti-union practices.

3.5.4. Trade Union Registration Process

A fair and transparent trade union registration process is essential for safeguarding workers' rights in Bangladesh. Necessary amendments to the Labour Act must ensure that registration procedures for all types of trade unions—including those in the formal and informal sectors, as well as unions of self-employed workers and professionals—are simple, transparent, and free from arbitrary rejection or undue delay. Currently, membership thresholds and procedural requirements under the Labour Act constitute major barriers to union formation, especially in large workplaces and labour-intensive sectors. Determining the total number of workers in an establishment is often impossible for workers, as employers and unions frequently dispute these figures. As a result, the DoL often rejects registration applications. Moreover, organisers are sometimes dismissed or harassed for initiating unionisation efforts. For enterprise groups, determining the total number of workers across multiple enterprises within a defined area is even more challenging. Employers frequently fail to maintain proper labour registers or manipulate such records. In addition, union applicants are often required to obtain certification from local councillors or administrative authorities attesting to worker identity and numbers—requirements that are difficult to fulfil and often lead to application rejections. Further, the Labour Act requires unions to prepare a constitution, elect leaders, and hold a general meeting before applying for registration—steps that are particularly challenging for workers.

The Director General of the DoL currently holds immense discretionary power to approve or reject registration applications without defined criteria, resulting in inconsistency and lack of transparency. Trade unions are not given an opportunity to respond to objections raised by the DoL after investigation, and no clear standards exist for rejection. This creates opportunities for delay, arbitrary decisions, and corruption.

To promote industrial relations, strengthen worker protection, and encourage collective bargaining, the Labour Reform Commission recommends the following measures to simplify and reform the trade union registration process:

(a) Simplifying Membership Requirements

- For enterprise-based trade unions, the membership threshold should be based on a minimum number of workers rather than a percentage of the total workforce. A tripartite committee should be formed immediately to review comparable models from neighbouring countries and recommend an appropriate minimum membership requirement, as well as guidelines for determining bargaining representatives.

- For enterprise-group unions, the 30% membership requirement should be reduced to a minimum of 50 workers. For unions in the informal sector, a minimum of 50 members should be required for regional unions and 400 for national unions.
- Until the proposed national labour database (see Section 3.1.3) is established, worker identification should be accepted through employer- or contractor-issued ID cards, occupation-specified national ID cards, or certification signed by the president/general secretary of a registered sectoral or national federation.

(b) Ensuring a Transparent and Fair Registration Process

- The DoL must adhere to a clear and specific timeframe for decisions:
    - A decision on registration must be made within 55 days, with accountability mechanisms for failure to comply.
    - Any deficiencies must be communicated in writing within 12 days.
    - Before final rejection, the union should be notified of objections and given 15 days to respond.
- A uniform Standard Operating Procedure (SOP) for registration must be developed and implemented to ensure consistency, transparency, and accountability across all cases.

(c) Rational Application of the DoL's Authority

- The DoL must be required to provide written, legally justifiable reasons for any rejection of a union registration application.
- Applications should not be rejected automatically for clerical or documentary errors; unions should be allowed an opportunity to correct such deficiencies.

(d) Protection of Workers

- Penalties for the dismissal or harassment of union organisers should be increased under the Labour Act.
- Sections 195 and 196(a) of the Labour Act currently do not allow workers to bring claims of unfair labour practices before the Labour Court. The law should be amended to allow aggrieved parties to file complaints against discriminatory conduct towards trade unions, with mandatory resolution within 30 days.

(e) Alternatives to General Meetings

- To eliminate discriminatory use of discretionary powers, the mandatory requirement to hold a physical general meeting for union formation should be replaced with alternative methods.
  Specifically, required resolutions may be adopted either in a general meeting or through a

written resolution signed by the majority of workers, including their employer-issued ID number (if available), national ID, or birth registration number.

(f) Enhanced Protection for Union Members and Organisers

- Sections 195 and 196(a) of the Labour Act, 2006 should be amended to strengthen protection for trade union members and organisers.

  New provisions should be introduced to ensure effective remedies against unfair labour practices such as harassment, intimidation, dismissal, or termination of union organisers, members, and officers.

  Workers dismissed for union-related activities should retain the right to continue their leadership roles and seek legal redress against harassment.

  Clear timeframes should be established for resolving unfair labour practice complaints both at the Labour Court and the DoL.

Accountability mechanisms should be enforced if the DoL fails to act within the prescribed timeframe.

(g) Election of Trade Union Executive Committees

- Section 317(4)(D) of the Bangladesh Labour Act, 2006 should be amended to specify that the Director General of the DoL may supervise or conduct trade union elections **only** upon request by the union concerned, or if election disputes arise following a petition by at least 10% of the members.

(h) Revocation of Trade Union Registration

- The provision allowing cancellation of a trade union's registration due to a decline in membership below a specified threshold should be repealed.

3.5.5 Role of Trade Union Federations as Collective Bargaining Representatives

Under the existing legal framework, a trade union federation may, subject to certain conditions, act as the Collective Bargaining Agent (CBA) on behalf of its affiliated trade union in an enterprise. As per the prevailing provisions, a federation may engage in collective bargaining on behalf of its member unions if authorised through a resolution adopted by the executive committee of the respective affiliated union. However, an additional condition has been imposed — that the constitutions of both the federation and the concerned union must contain an explicit provision empowering such representation. This additional condition unduly restricts the autonomy of affiliated unions to select their representative organisation and creates unnecessary administrative complexities in the process of effective collective bargaining. Therefore, it is recommended that

the requirement — *"No such authorisation shall be valid unless specifically provided for in the constitution"* — be repealed.

If a union is affiliated with a federation and its executive committee provides due authorisation, the said federation should be deemed eligible to represent or participate in collective bargaining on behalf of that union without any further conditions.

Commission's Recommendations on the Functions of Federations

a) Legal and Institutional Support for Workers

- With the consent of the parties concerned, representing workers who are not members of any registered trade union in matters of labour disputes, legal proceedings, and advocacy initiatives.
- Providing legal, financial, and training support to workers in the informal or unorganised sectors to enhance their skills and capacities.

b) Protection and Enforcement of Labour Rights

- Filing complaints with labour authorities and undertake legal proceedings in cases of labour rights violations, discrimination, or unfair dismissals.
- Representing workers or unions in legal actions under the Bangladesh Labour Act (BLA).

c) Matters Related to Trade Union Federations

- The BLA should be amended to include a specific provision granting trade unions and federations legal authority to perform these functions. Such recognition would empower federations to take a more active role in supporting workers' rights, engaging in social dialogue, and providing essential assistance to both unionised and non-unionised workers.
- Through these reforms, trade unions and federations would be able to function more effectively, ensuring that all workers — regardless of industry, employment status, or union membership — enjoy adequate representation, protection, and support in the workplace.

3.5.6 Representation of Workers in Committees, Commissions, and Delegations

In the national Tripartite Consultative Committee (TCC), government-formed bodies, commissions, and delegations that include worker representatives, a transparent and well-defined process for the nomination or election of such representatives must be established. In the past, the nomination process for worker representatives in various government policy-making structures has often lacked transparency, which has hindered effective representation of workers' interests.

Trade unions also face challenges in identifying counterpart employers' associations at the sectoral or enterprise group level for collective bargaining or grievance resolution, as such employer organisations often do not exist.

In this context, the Commission presents the following recommendations:

a) In all national social dialogue forums, tripartite consultative committee, labour courts, and other government-formed committees, commissions, and delegations where worker representatives are to be included, a transparent and systematic process of nomination or election should be followed.

The election process should consider key factors such as:

- Representation based on the number of dues-paying members of each union or federation;
- Establishing a credible mechanism for verifying membership numbers; and
- Determining representation proportionately according to membership size and the number of seats in each forum.

Representatives from unions of self-employed or informal-sector workers possessing subject-matter expertise should also be included.

b) If a union represents workers in an enterprise belonging to a group of establishment, it shall have the right to engage directly in collective bargaining or grievance resolution discussions with that enterprise on behalf of its members.

c) The Department of Labour should prepare and maintain an updated list of unions and federations based on the number of dues-paying members reported in their annual returns. This list shall serve as the basis for the nomination of representatives to committees, forums, courts, the International Labour Conference, and other national and international platforms for social dialogue. Membership figures should be verified every five years for updating purposes; however, a reduction in membership shall not constitute grounds for cancellation of a union's registration.

d) Proportional representation should be maintained according to the rank order of membership. In cases of joint or coalition-based representation at the enterprise, sectoral, or national levels, the combined membership of all constituent organisations should be taken into account.

3.5.7 Policy Framework for Establishing Strong Trade Union Federations to Ensure Strong Representation

Section 200 of the Bangladesh Labour Act sets out the minimum requirements for forming trade union federations. According to this provision:

- At least **five** trade unions are required to form a sectoral federation;
- **Twenty** trade unions are required to form a national federation; and

- **Ten** national federations are required to form a confederation.

While these provisions have helped to structure the trade union movement, the increasing number of unions may lead to the proliferation of too many federations, which could weaken the overall representational strength of the trade union movement. The government may, through a tripartite consultative mechanism, incorporate appropriate provisions into the law to address this issue effectively.

3.6 Industrial Unrest, Dispute Resolution, and Access to Justice

Ensuring the right to file grievances, seek redress, and obtain justice in cases of rights violations or discrimination is a fundamental condition for protecting workers' rights and establishing social justice. Articles 27 and 31 of the Constitution of Bangladesh guarantee equality before the law and equal protection under the law, ensuring that every citizen has the right to access justice when aggrieved or victimised.

Under the National Labour Policy 2012, the Government of Bangladesh aims to resolve industrial disputes and unrest through conciliation and adjudication by the Labour Court and Labour Appellate Tribunal. The policy explicitly states that efforts shall be made to prevent industrial disputes by maintaining a conducive industrial environment and ensuring effective mechanisms for dispute settlement through negotiation, conciliation, and legal recourse (Clause 15.00 on Dispute settlement). The policy also commits the government to discourage unfair labour practices and to strengthen mediation and arbitration processes for speedy dispute resolution. Regarding the assurance of justice, the Labour Policy states that *"to reduce the harassment of justice seekers, the government will remain active in bringing necessary amendments to the labour law, increasing the number of labour courts, and introducing alternative dispute resolution mechanisms."*

The Bangladesh Labour Act 2006 provides comprehensive legal provisions on workers' rights, safety, wages, working conditions, leave, termination, and welfare, as well as mechanisms for addressing violations through dispute resolution procedures. Chapter XIV (Sections 209–231) of the Act sets out the legal framework for dispute resolution, including labour courts, appellate tribunals, and related procedures. The law prioritises resolution through negotiation, and where necessary, enables settlement through arbitration or conciliation. It also includes provisions on strikes, lockouts, and unlawful work stoppages, ensuring that neutral judicial bodies such as the Labour Court and Labour Appellate Tribunal play a decisive role in resolving disputes and delivering justice.

The Universal Declaration of Human Rights (Articles 23 and 24) recognises the rights of workers to fair wages, rest and leisure, and to form and join trade unions. Likewise, the International Covenant on Economic, Social and Cultural Rights (Article 8) guarantees workers the rights to form trade unions, join federations and confederations, affiliate with international organisations,

and to strike. These instruments affirm the legitimacy of workers raising grievances collectively and seeking redress through organised action.

The UN Guiding Principles on Business and Human Rights (UNGPs), based on the *"Protect, Respect and Remedy"* framework, require both governments and businesses to respect workers' rights to organise and bargain collectively. Any interference in such rights constitutes a violation of human rights. The Government of Bangladesh and enterprises, therefore, have a duty to safeguard these rights and to ensure fair and lawful mechanisms for the prevention and resolution of disputes.

The ILO Convention No. 154 (Collective Bargaining, 1981) encourages the use of collective bargaining to strengthen worker–employer relations and prevent industrial disputes. Similarly, ILO Recommendation No. 92 (Voluntary Conciliation and Arbitration, 1951) promotes the use of peaceful settlement mechanisms rather than resorting directly to strikes or lockouts. Furthermore, ILO Convention No. 144 (Tripartite Consultation, 1976) emphasises the establishment of effective tripartite frameworks for social dialogue among workers, employers, and the government. Implementation of these conventions in Bangladesh would significantly contribute to the protection of workers' rights, promotion of collective bargaining, and prevention of industrial disputes.

Finally, the Decent Work Country Programme for Bangladesh (2022–2026) identifies as its Strategic Priority 3: *"Strengthening labour market governance and social dialogue to promote international labour standards and workers' rights."* This commitment underscores the government's responsibility to protect the right of workers to organise and to safeguard trade union activities, which are essential for the effective resolution of industrial unrest and disputes.

Full implementation of these objectives will help establish a robust and equitable labour market, thereby fostering long-term industrial peace and social justice in Bangladesh.

3.6.1 Remedies and Access to Justice in Case of Rights Violations

The causes behind the growing incidence of industrial and labour unrest are multifaceted. These stem from issues related to employment contracts, workplace conditions, workers' opportunities for representation, and structural and administrative weaknesses.

Violations of employment terms—such as inadequate wages, delayed wage payments, non-payment of overtime compensation, and irregularities concerning leave—generate frustration and resentment among workers. Additionally, deterioration of the work environment, particularly the absence of safety measures, limited opportunities for rest, and poor compliance with health standards, has become a leading cause of labour unrest.

The lack of regular dialogue and problem-solving initiatives between employers and workers often leaves disputes unresolved, further complicating the situation. In most establishments, either trade unions do not exist, or they fail to function effectively, thereby reducing workers' opportunities to

raise demands or engage in collective bargaining—ultimately fuelling dissatisfaction. Moreover, inadequate monitoring by the Department of Labour and the Department of Inspection for Factories and Establishments (DIFE) means that compliance with labour laws cannot be properly ensured. The lengthy process of case disposal in labour courts is another major source of frustration, heightening workers' discontent. Collectively, these structural and administrative shortcomings are intensifying labour unrest, which, in turn, poses risks to economic stability.

For sustainable development, continuous production, and a well-coordinated industrial relations framework—from enterprise to national level—it is essential to ensure legal protection of workers' rights, strengthen inspection mechanisms, guarantee the rights of organisation, bargaining, and representation, and establish institutional frameworks for effective dialogue and negotiation at all levels. However, in Bangladesh, such initiatives remain limited and weak. The absence of an enabling environment for the exercise of organisational and bargaining rights, the lack of a culture of dialogue-based dispute resolution, and the exclusion of large numbers of informal workers from legal protection have collectively fostered deprivation, inequality, and a culture of social impunity.

The Commission therefore observes that existing inequalities, lack of workers' rights, and the absence of effective redress mechanisms for deprivation and denial of justice are major obstacles to sound industrial relations and national development. To address these challenges, the Commission recommends the following measures:

a) Ensure legal protection and effective enforcement mechanisms to guarantee all workers' rights and equitable entitlements.

b) Establish designated authorities, procedures, and mechanisms for filing complaints against violations of individual and collective rights, and determine specific timelines for redress.

c) Create formal structures for dialogue at the enterprise level with appropriate representation from both workers and employers.

d) Ensure the practice of effective collective bargaining and, where necessary, provide for arbitration and mediation mechanisms.

e) Establish alternative dispute resolution (ADR) systems for both individual grievances and industrial disputes.

f) Ensure sufficient labour courts and strengthen their institutional capacity to deliver justice efficiently.

g) Introduce special grievance redress mechanisms for informal, agricultural, and self-employed workers beyond existing formal arrangements.

h) Strengthen the role and procedures of the Minimum Wage Board and ensure timely payment of wages with utmost priority.

3.6.2 Recommendations for Dispute Resolution

For Formal Sector – Individual and Collective Disputes

a) As most disputes originate at the factory level, legal procedures for resolving both individual and collective disputes at the enterprise level must be enforced and strengthened.

b) Workers must have effective means to file complaints with the Department of Inspection for Factories and Establishments (DIFE) or the Department of Labour if resolution cannot be achieved at the factory level.

c) For the informal sector, arrangements must exist to allow complaints to be filed with labour inspectors, labour directors, or, in their absence, with an authority designated by the government at the regional level. Section 124(a) of the Bangladesh Labour Act should be revised and made more comprehensive to facilitate this process.

d) If disputes remain unresolved at the earlier stages, mechanisms must be established for workers to obtain prompt remedies through the Labour Court. Where appropriate, a system of alternative dispute resolution may be introduced at the preliminary stage of court proceedings.

e) Any disciplinary or termination measures against workers must follow transparent and fair procedures, ensuring the right to defend oneself.

f) Workers' or their representatives' involvement in the labour inspection process must be ensured, and inspection reports should bear the signature of a union representative or, in their absence, a worker's signature.

For Industrial Disputes

a) The right to conduct trade union activities and engage in collective bargaining at the enterprise level must be ensured.

b) Workers' participation in factory-based committees, including safety committees and sexual harassment prevention committees, must be ensured.

c) The role and responsibilities of welfare officers should be structured so that they can act independently in ensuring workers' welfare.

d) If an individual worker is denied justice at the enterprise level, they must be able to lodge a formal complaint directly to DIFE through hotline, email, or any other medium, and such complaints shall be considered official.

e) Based on the globally recognised and effective "shop steward model," worker-elected representatives may be established and trained at the floor, section, or numerical level, to enable

workplace-level dispute resolution. In sections with a high proportion of female workers, female shop stewards must be appointed.

f) Tripartite Crisis Management Committees may be established at enterprise, sectoral, or regional levels to address special circumstances.

g) Tripartite committees may also be formed at the national level for major sectors, including the ready-made garments industry.

For the Informal Sector

a) Workers in various occupations and sub-sectors of the informal economy must be allowed to organise and be represented, with the legal right to engage in dialogue and sign agreements with employers, associations, and relevant authorities.

b) Dedicated offices or desks under all directorates of the Ministry of Labour and Employment should be established at the departmental head-offices, as well as at the offices of district and upazila levels to facilitate dispute filing and access to legal entitlements for informal workers.

At the National Level

a) Ensure transparency, enhanced capacity, regular dialogue, and effective implementation of decisions in the formation and functioning of tripartite committees.

b) Establish a National Labour Dialogue Forum to address labour unrest. The Forum shall review labour laws and policies, propose new laws and regulations, and make recommendations to the government on implementation processes.

c) Ensure the legal recognition and institutional basis of collective bargaining agreements concluded at national and sectoral levels, and enforce departmental accountability for their implementation.

d) Organise an annual National Tripartite Labour Conference to deliberate on workers' rights, industrial relations, and participatory policymaking, involving representatives of all three parties and labour rights experts.

Conciliation, Arbitration, and Mediation

a) The existing processes of conciliation, arbitration, and mediation must be made more worker-friendly, effective, and time-appropriate, ensuring that any aggrieved individual completes the alternative dispute resolution process before proceeding to court.

b) The court must ensure that no aggrieved party is influenced by threats, intimidation, or financial inducements during the conciliation, arbitration, or mediation process.

Ensuring the Legal Right to Strike

a) Workers' demands must be treated with respect and urgency, and initiatives for prompt resolution must be undertaken.

b) Instead of pursuing demands through movements outside the factory, workers should be encouraged to resolve disputes through dialogue and negotiation.

c) The right to raise demands, lodge disputes, and exercise the right to strike in a lawful and peaceful manner must be ensured.

d) The inconsistencies between the Bangladesh Labour Act (BLA) and the Bangladesh Labour Rules (BLR) concerning strike notice procedures must be removed to establish a transparent and lawful framework. Rule 204 of the BLR should be amended to align with Section 210(11) of the BLA, allowing sufficient time for the CBA to complete the secret ballot process and issue a strike notice within 15 days. Clarifying procedural steps is essential to remove obstacles to the lawful exercise of the right to strike.

e) The government's authority to prohibit strikes after 30 days should be accompanied by a legal obligation to ensure wage compensation for workers. If a strike is prohibited by the government, workers should not suffer financial loss for exercising their lawful rights. Ensuring full wage payment in such cases will prevent economic hardship and arbitrary interference, thereby preserving workers' bargaining power.

Alternative Dispute Resolution (ADR)

a) In addition to enforcing existing laws, emphasis must be placed on legal reforms, improved working conditions, and enhanced employer–worker relations to reduce labour unrest. Collective initiatives should be taken to resolve disputes at the earliest possible stage.

b) ADR mechanisms should be institutionalised and revitalised as a long-term and sustainable solution to industrial unrest and to ensure justice.

c) To reduce over-dependence on labour courts and expedite dispute resolution, the ADR mechanisms prescribed under the Bangladesh Labour Act must be made mandatory in industrial dispute settlements.

d) Awareness and capacity-building initiatives for both workers and employers should be undertaken to make ADR mechanisms effective.

3.6.3 Reform of Laws and Policies for the Prevention and Resolution of Labour and Industrial Disputes

There are several limitations in the *Bangladesh Labour Act 2006* in relation to the prevention and resolution of labour and industrial disputes. The current framework lacks effective mechanisms for the prompt settlement of such disputes, resulting in prolonged harassment and uncertainty for workers. Although the law provides a formal process for dispute resolution between employers and employees in the formal sector, this process remains complex and time-consuming. Because of the lengthy procedures involved in conciliation, arbitration, adjudication by the Labour Court, and appeals to the Appellate Tribunal, workers rarely receive timely remedies. Consequently, workers suffer mental stress, financial hardship, and, in many cases, risk losing their employment while the dispute remains unresolved.

For workers in the informal sector, labour laws and other relevant provisions are not effectively enforced, leaving their rights inadequately protected. As the majority of Bangladesh's workforce is employed in the informal economy, access to legal remedies is extremely limited. Most informal workers are not members of trade unions, and availing legal support from governmental or non-governmental institutions remains difficult.

The existing legal framework also lacks provisions for immediate intervention in cases of sudden industrial unrest. While the Department of Labour or other industrial relations agencies may be involved in resolving such unrest, institutional weaknesses and procedural delays prevent swift solutions.

Although the *Bangladesh Labour Act* provides for the resolution of industrial disputes through conciliation and arbitration, these mechanisms are rarely implemented effectively. Workers are therefore often compelled to pursue individual cases through the courts — a process that is both costly and time-consuming. Even when judgements are delivered in favour of workers, administrative complications frequently obstruct their enforcement, making it difficult for workers to secure justice.

The absence of coordination among legal and regulatory bodies significantly prolongs the dispute resolution process. A clear lack of effective coordination is evident among the relevant institutions responsible for addressing worker grievances and industrial disputes. There is no well-defined coordination framework linking the Department of Labour, Labour Courts, the Labour Inspection Directorate, and organisations representing employers and workers. Although the Labour Inspection Directorate often identifies workplace issues, it is frequently unable to initiate timely and appropriate legal actions to ensure their resolution. In addition, weak mechanisms for information sharing among courts, labour administration bodies, and arbitration boards further delay the resolution process. As a result, dispute settlement becomes protracted, making access to justice increasingly difficult for workers.

To reform laws and policies for the prevention and resolution of labour and industrial disputes, the Labour Reform Commission recommends the following measures:

a) Amendment of the labour law to ensure faster dispute resolution: The law should be revised to introduce binding time limits for the settlement of individual and industrial disputes. Provisions must also be included to ensure the prompt delivery and enforcement of judgements. Furthermore, new safeguards should be introduced to protect workers from harassment or retaliatory actions during the dispute process.

b) Establishment of an integrated grievance redress mechanism (GRM): A unified, independent, impartial, and efficient Grievance Redress Mechanism should be introduced to enable workers to report complaints easily and receive prompt solutions. This system may include online platforms, toll-free hotlines, and physical complaint centres, where workers can submit grievances confidentially. The GRM must ensure that workers are not deprived of their legal rights at any stage of the process.

c) Promoting a culture of mediation, arbitration, and amicable settlement: To reduce pressure on the courts, amendments to the labour law should make alternative dispute resolution (ADR) mechanisms — such as conciliation, mediation, and arbitration — mandatory in appropriate cases. Capacity-building initiatives should be undertaken to enhance trust among employers and workers in these alternative mechanisms.

d) Ensuring institutional coordination among dispute resolution agencies: A clear legal framework should be established to coordinate the work of the Department of Labour, the Department of Inspection for Factories and Establishments, employers' and workers' organisations, labour relations officers, the Ministry of Labour and Employment, and the labour courts.

e) Strengthening mechanisms for the immediate resolution of labour unrest: The law should provide for integrated and proactive measures to prevent and manage sudden labour unrest. This includes regular bipartite and tripartite dialogue, effective channels for filing complaints, and rapid-response systems for immediate problem-solving.

3.6.4 Institutional and Legal Measures for the Prevention of Labour Unrest

Labour unrest in industrial enterprises arises from a range of factors. In most cases, management fails to identify and address the underlying causes in advance, allowing grievances to escalate into agitation and, eventually, into violence. Each factory or industrial establishment should therefore have a structured platform for dialogue involving trade unions or workers' participation committees, employer representatives, and labour relations officers. Regular communication with workers, listening to their concerns, and taking administrative measures to address them are essential to maintaining workplace harmony.

Currently, regular dialogue and consultation among employers, workers, and labour administration are not mandatory under the labour law. Labour and factory inspectors seldom engage directly with workers during workplace inspections, limiting their ability to identify problems and initiate resolution through bipartite or tripartite discussions. The lack of ongoing employer–worker dialogue allows discontent to escalate rapidly. Industrial establishments require institutional platforms for regular discussions on issues such as wages and bonuses, working hours, overtime, and occupational safety.

At present, efforts to prevent or reduce labour unrest primarily focus on enforcing existing laws. Little emphasis is placed on preventive strategies, effective grievance mechanisms, or measures to strengthen employer–worker relations. The absence of comprehensive legal reform, alternative dispute resolution mechanisms, safe working environments, and efficient complaint-handling processes continues to fuel labour and industrial conflict.

To strengthen institutional and legal mechanisms for preventing labour unrest, the Labour Reform Commission makes the following recommendations:

a) Identification of potential causes of unrest and adopt preventive measures: Each factory and industrial establishment should establish an *Industrial Relations Management Unit* comprising representatives of trade unions or participation/cooperation committees and employer representatives. This unit will be responsible for regularly hearing workers' grievances and taking initiatives to resolve them before they escalate.

b) Mandatory employer–worker dialogue and negotiation: Regular bipartite negotiations and tripartite dialogues must be institutionalised, involving employers, worker representatives, and government authorities at specified intervals. Dedicated platforms should be created in each establishment for regular discussions on wages, bonuses, working hours, overtime, and workplace safety.

c) Monitoring mechanisms to ensure workplace safety: The absence of safe and decent working conditions is one of the major causes of labour unrest. The labour inspection system should therefore be significantly strengthened. This requires increasing the number and capacity of inspectors and establishing effective accountability mechanisms for their performance.

d) Establishment of a robust and broad-based preventive system: To reduce labour unrest, a comprehensive preventive framework should be introduced, supported by an effective grievance redress process and initiatives to improve employer–worker relations.

3.6.5 Labour Courts and the Labour Appellate Tribunal

Labour Courts and the Labour Appellate Tribunal play a crucial role in protecting workers' rights and resolving labour disputes. However, procedural complexity, administrative inefficiency, and

significant delays in case disposal have created multifaceted challenges for workers seeking justice.

The Labour Court functions as a specialised judicial forum designed to resolve employment-related disputes, protect workers' rights, and ensure justice. Governed primarily by the *Bangladesh Labour Act 2006* and the *EPZ Labour Act 2019*, it serves as the principal platform for adjudicating employment grievances. Despite its critical role, Bangladesh's labour justice system faces numerous challenges that impede timely and fair resolution of disputes. Although the legal framework exists, the operation of Labour Courts and Tribunals is hampered by severe delays, resulting in uncertainty and stress for the parties involved.

Currently, there are only 13 Labour Courts across the country — three in Dhaka, two in Chattogram, and one each in Narayanganj, Gazipur, Cumilla, Khulna, Sylhet, Rangpur, and Barishal. This limited number does not adequately reflect the distribution of industrial activity. For example, while Sylhet has a Labour Court with relatively few cases, industrially dense areas such as Moulvibazar and Sreemangal lack any such court. Consequently, many workers must travel long distances and bear significant financial costs to access legal recourse. As a result, many are discouraged from filing cases altogether. In addition to the shortage of courts, a lack of judges further exacerbates the backlog. A single judge typically disposes of 250–300 cases per year, yet the caseloads in Dhaka's Labour Courts far exceed this number, making it virtually impossible to conclude cases within the statutory timeframe.

According to a 2024 report, the number of pending cases in 13 labour courts across the country stands at 21,617. A report published on 28 December 2024 in the newspaper *Prothom Alo* indicates that a total of 20,283 cases are currently under adjudication in 13 labour courts and one Labour Appellate Tribunal. Of these, 8,515 cases are pending in the 1st, 2nd, and 3rd Labour Courts of Dhaka District; 6,077 cases in the Gazipur Labour Court; 2,118 cases in the Narayanganj Labour Court; 1,934 cases in the 1st and 2nd Labour Courts of Chattogram; 148 cases in the Khulna Labour Court; 140 cases in the Cumilla Labour Court; 86 cases in the Rajshahi Labour Court; 84 cases in the Rangpur Labour Court; 81 cases in the Barishal Labour Court; 56 cases in the Sylhet Labour Court; and 1,044 cases are pending before the Labour Appellate Tribunal.

While the delays in case disposal are severe, their causes are structural. The *Bangladesh Labour Act* stipulates that a case should be resolved within 60 days, extendable by another 90 days — a total of 150 days. However, the law imposes no penalty for exceeding this limit, leading to chronic procedural delays.

To strengthen the effectiveness and efficiency of the labour justice system, the Labour Reform Commission recommends the following:

a) The number of Labour Courts based on case volume and regional need needs to be increased. Circuit courts may be introduced in key industrial areas to ensure faster and more equitable access to justice.

b) Sections 216 and 218 of the Labour Act needs to be amended to enforce strict compliance with reasonable timelines for case disposal.

c) Procedural reform and modernisation:

- Applications for adjournments should be strictly regulated, and financial penalties should be imposed for unnecessary delays.
- Attendance of court members must be mandatory, and statutory deadlines for delivering judgements should be rigorously enforced.

d) Enhancement of efficiency through automation:

- The introduction of digital systems for issuing notices, updating case status, and delivering judgements is essential to modernise the labour justice process.
- An online platform should be developed to manage case filings and provide easy access to case documents and records.

e) Simplification of case procedures for workers:

- Witness examination should only be required when essential for case determination. Where documentary evidence is sufficient, cases should be decided through written submissions and oral arguments.
- Deadlines for filing written statements, objections, or replies should have clear limits, and penalties should be imposed for unnecessary extensions or delays.
- Orders and judgements should be written in clear and simple Bangla to ensure workers can easily understand the outcomes of their cases.

f) Regulation of interim injunctions:

- Regular judicial review and monitoring should be conducted to prevent misuse of interim injunctions or stay orders.
- The law should empower courts to revoke injunctions or stay orders if they are found to be used to prolong proceedings.

g) Strengthening the role of the Labour Appellate Tribunal:

- The number of judges in the Labour Appellate Tribunal should be increased to enable more hearings and faster disposal of cases.
- The Tribunal may be empowered to hold circuit hearings in regional locations where necessary.

- The current practice of appointing district judges as Chairpersons or Members may create awkward hierarchical situations, as the Tribunal reviews decisions of Labour Court Chairpersons of equivalent rank. This structure should be revised.
- The Chairperson of the Labour Appellate Tribunal should be granted administrative and disciplinary authority over Labour Court personnel to ensure accountability.
- The right to appeal to the Tribunal against interim orders of Labour Courts should be legally recognised.

h) Ensureing adequate funding for Labour Courts and Tribunals:

- Sufficient financial resources and human capacity must be allocated for effective functioning.
- Judges of Labour Courts should receive benefits equivalent to those of district judges.

i) Introducing and institutionalising Alternative Dispute Resolution (ADR):

- A mandatory pre-litigation conciliation period should be introduced to encourage early settlement.
- ADR mechanisms similar to those used in Family Courts — including pre-trial hearings and 30-day mediation opportunities — may be adopted for labour disputes.
- Legal provisions should be established to allow dispute settlement outside court where appropriate.
- A legally mandated and effective *Grievance Redress Mechanism (GRM)* should be implemented to secure workers' rights and benefits.

3.6.6 Legal and Institutional Measures to Prevent the Criminalisation of Workers

It is essential to ensure that criminal cases are not filed against workers as *unnamed accused* without specific allegations or evidence in situations of industrial unrest. Individual accountability must be established on the basis of credible, evidence-based charges, and only those directly involved in unlawful acts should face legal proceedings.

In practice, First Information Reports (FIRs) often name a few specific individuals while also accusing numerous unidentified workers. This leads to widespread fear, insecurity, and panic within factories. Arbitrary arrests of workers — including those uninvolved or absent from the incident — are common. Many such workers are wrongfully detained, implicated in fabricated cases, and subjected to years of legal harassment. The economic and psychological burden of prolonged legal battles is severe. Workers frequently lose their employment and source of income, placing their families in grave hardship.

Law enforcement agencies must be adequately trained to address labour disputes and unrest in a professional, peaceful, and constructive manner. The sustainable approach to preventing labour unrest lies not in punitive action, but in ensuring that workers' legitimate rights are fully protected — including the right to fair wages, the right to organise, and the right to collective bargaining. Efforts must focus on addressing the root causes of discontent.

To prevent the criminalisation of workers in cases of labour unrest, and to promote fair and constructive management of industrial disputes, the Labour Reform Commission recommends the following:

a) The end of indiscriminate criminal prosecution of workers:

Industrial disputes should be approached with the objective of maintaining peace and stability in industrial zones, rather than with a punitive mindset. Mechanisms should be put in place to ensure that workers receive protection and remedies instead of being compelled into unlawful behaviour.

b) A permanent, multi-stakeholder committee for rapid incident assessment:

This committee should include representatives of employers, workers, the Department of Labour (DoL), the Department of Inspection for Factories and Establishments (DIFE), and law enforcement agencies. It will conduct impartial investigations to determine the facts and recommend appropriate measures.

c) Withdrawal of unjust criminal cases against workers:

Pending criminal cases against workers should be reviewed in accordance with the procedures outlined above, and steps should be taken to withdraw cases where evidence does not substantiate the allegations. At the same time, law enforcement agencies should receive training to handle labour disputes and unrest in a professional, peaceful, and constructive manner.

3.6.7 Ensuring Timely Payment of Workers' Wages

One of the principal causes of labour unrest in Bangladesh is the failure to pay workers' wages on time. The majority of workers receive low wages that are insufficient to meet the basic cost of living. Their livelihoods depend entirely on monthly earnings; thus, any delay in wage payment pushes them into acute financial distress. In such circumstances, workers are left with no alternative but to protest. These protests are often spontaneous and unorganised, arising without the direct leadership of trade unions or worker associations. There is a growing perception among workers that neither employers nor the government fully recognise or address their plight. Consequently, they often resort to demonstrations, road blockades, and other public forms of protest as a means to draw attention to their grievances.

To ensure timely payment of wages, the Labour Reform Commission recommends the following:

a) A robust enforcement mechanism must be established to ensure wages are paid on time. Monitoring systems should be strengthened to verify compliance, and penal provisions should be introduced for delayed wage payments.

b) Wage-related disputes should be prioritised in the judicial process. Specific time limits should be set for hearings, and courts should be required to deliver and enforce verdicts within prescribed periods.

c) Where workers engage in protests due to non-payment of wages, employers must bear full responsibility. Legal measures should be enacted to hold employers accountable and subject them to penalties for wage default.

d) When workers cease work in protest of unpaid wages or lawful dues, such actions must not be classified as illegal strikes, nor should workers' wages be deducted for participating in such protests.

3.6.8 Legal Protection for Solidarity Actions in Support of Workers' Movements

Solidarity has long been a core value of the labour movement. To uphold this principle, it is essential to provide legal protection for solidarity activities undertaken in support of workers' legitimate demands and against violations of labour and human rights. The Commission recommends that trade unions, federations, labour and human rights organisations, NGOs, and professional associations working for the protection of workers' interests be legally permitted to engage in solidarity actions. Provisions should be incorporated into law to safeguard and legitimise welfare-oriented and solidarity initiatives. Furthermore, human rights organisations, labour rights NGOs, professional associations, and development partners should be formally included within the framework of social dialogue mechanisms, ensuring their constructive participation in addressing labour-related issues.

3.6.9 Recommendations regarding Workplace Cooperation Committees and Workers' Representation

- The current Participation Committee should be renamed the Workplace Cooperation Committee (WCC).
- The formation of a Workplace Cooperation Committee should be mandatory for all establishments, regardless of whether a trade union exists.
- In establishments where a Collective Bargaining Agent (CBA) or other trade unions exist, the worker members of the WCC shall be nominated by the CBA and/or unions.

- Where trade unions are present, the WCC shall perform specific functions prescribed by law, but it shall not assume the duties or activities of the CBA or other registered unions.
- In establishments where no trade union exists, the worker representatives of the WCC shall be responsible for safeguarding workers' interests.
- Legal provisions must be enacted to ensure employment security and protection from victimisation for worker members of the WCC.

3.6.10 Security of Workers, Enterprises, and Industrial Zones

The state bears a crucial responsibility in ensuring the safety and security of workers and industrial operations within industrial zones. At present, there is no clear policy framework defining when, how, and to what extent law enforcement agencies, including the industrial police, may intervene in matters relating to labour-management relations.

To ensure transparency and accountability in the actions of law enforcement bodies and the industrial police, the Commission makes the following recommendations:

a) The roles of law enforcement agencies, local police stations, and the industrial police in matters of labour and industrial relations must be clearly defined through specific legal provisions. The industrial police must not interfere in labour relations or dispute resolution processes. However, in situations where there is a likelihood of deterioration in law and order, their role shall be limited to assisting the Department of Labour (DoL) and the Department of Inspection for Factories and Establishments (DIFE) in maintaining order.

b) Where any situation poses a potential risk to industrial peace or law and order, both the DIFE and relevant law enforcement agencies should be immediately informed, as mandated by law.

c) The role of local police and law enforcement authorities should be expanded to include the protection of workers from harassment and ensuring their personal security in industrial areas, alongside addressing labour-related unrest.

d) All members of law enforcement agencies must receive specialised pre-deployment training—to be provided through the Industrial Relations Institute (IRI)—covering the national labour law, international labour standards, workers' fundamental rights, and conflict-sensitive approaches to managing labour relations and industrial disputes.

3.7 Equality, Non-Discrimination and Inclusion

Workplace discrimination refers to unfair or unequal treatment towards a worker, or denial of opportunities, on grounds of religion, race, ethnicity, gender, age, disability, social identity or political belief.

The Constitution of Bangladesh guarantees equality and social justice for all citizens as part of its fundamental rights and state policy directives.

- Article 27 ensures equal protection of the law for all citizens.
- Article 28 prohibits discrimination on the basis of religion, community, race, or gender, while allowing special provisions for the advancement of women, children, and disadvantaged groups.
- Article 29 mandates equal opportunity in public employment and special measures for those deprived of such opportunities.
- Articles 23 and 23(A) commit the State to preserve, develop, and promote the language, culture, and traditions of small ethnic groups, indigenous peoples, and communities to ensure their equal participation in civic life.

The National Labour Policy 2012 sets equality in the workplace as a core objective, prioritising the elimination of gender-based discrimination and ensuring a non-discriminatory work environment and employment opportunities for indigenous, ethnic, Dalit, disabled, floating, and disadvantaged groups.

The Bangladesh Labour Act 2006 (as amended in 2018) contains several important provisions to promote equality and protect workers' rights.

- Section 345 mandates equal wages for men, women, and workers with disabilities for work of equal nature and prohibits wage discrimination.
- Sections 46–50 provide maternity benefits for women workers.

The National Women Development Policy 2011 directs the government to promote gender equality, economic empowerment, prevention of workplace harassment, and support for women entrepreneurs. The Rights and Protection of Persons with Disabilities Act 2013 guarantees legal and social protection of persons with disabilities.

Internationally, ILO Conventions 100 (1951) and 111 (1958) emphasise equal remuneration and the elimination of discrimination in employment. The Universal Declaration of Human Rights (1948) recognises the right to equal pay for equal work. Under the International Covenant on Economic, Social and Cultural Rights (ICESCR), Article 23.2 requires equal remuneration for work of equal value for men and women. CEDAW Article 11(1)(d) ensures equality in employment, opportunities, and treatment. Furthermore, SDG 5 commits to achieving gender

equality and women's empowerment, while SDG 10 aims to reduce inequality and ensure equal opportunity for all.

In light of these constitutional, legal, and international commitments, the Commission proposes the following measures to eliminate discrimination, promote equality, and ensure inclusion of all individuals—irrespective of religion, ethnicity, or social identity—in every sphere of employment.

3.7.1 Elimination of Discriminatory Practices in the Workplace

Workplace discrimination in Bangladesh remains deeply entrenched, particularly against women and marginalised communities. Social attitudes, concerns over safety, and restricted mobility continue to limit women's participation in the labour force.[16] A majority of women are engaged in low-paid, insecure, home-based or informal agricultural work.[17] For marginalised communities—such as indigenous peoples, Dalits, sanitation workers, and persons with disabilities—these barriers are even more pronounced. Women in the informal sector, who constitute a significant share of the labour force, are largely excluded from the protection of labour laws, leaving them without access to maternity benefits, safe working environments, or other basic rights. Sex workers face extreme social exclusion and lack legal recognition, further compounding their vulnerability.

Migrant domestic workers, both within and outside the country, encounter multiple forms of exploitation and face challenges reintegrating into families and society upon return. Discrimination at work affects not only individual workers but also their families and society at large. It perpetuates economic dependency, limits women's opportunities for fair wages and career advancement, and entrenches social inequality.

To eliminate all forms of workplace discrimination, the Labour Reform Commission recommends the following:

a) It is necessary to ratify ILO Convention No. 190 on violence and harassment in the world of work, and amend the Bangladesh Labour Act, Labour Rules, and relevant provisions of the Penal Code to address gender-based violence. It is also necessary to strengthen implementation of the 2009 High Court Guidelines on the Prevention of Sexual Harassment.

b) It should be mandatory for all public and private workplaces to adopt and enforce a non-discrimination policy.

c) Specialised training for labour inspectors is necessary to identify and address gender-based discrimination effectively, and set a target for increased recruitment of female inspectors.

---

[16] Kabeer, Huq & Rahaman (2021); Mahmud, S., Bidisha, S.H. (2018). Female Labour Market Participation in Bangladesh: Structural Changes and Determinants of Labour Supply; Kotikula, A., Hill, R., & Raza, W. A. (2019). What Works for Working Women? Unpacking the Constraints on Female Labour Force Participation in Bangladesh.

[17] Bangladesh Bureau of Statistics, Bangladesh Labour Force Survey, 2023, 2022

d) Nationwide awareness campaigns should be launched to challenge discriminatory social norms that restrict women's participation in the labour market. Campaigns should highlight women's empowerment at work, fair wages, and the elimination of gender-segregated occupations.

e) Legal recognition and protection for sex workers should be ensured, including definition of their employment status and entitlement to labour rights and benefits.

3.7.2 Ensuring Universal Maternity Protection

Maternity protection and safe childbirth are essential for the stability of society, industry, and the economy. In Bangladesh, maternity leave provisions remain uneven and inadequately enforced. Government employees are entitled to six months of paid leave, while the Labour Act provides for 112 days (approximately four months), which is not consistently implemented across sectors. Contractual, temporary, and outsourced workers—often employed through contractors—are excluded from such entitlements. In the informal sector, maternity leave is virtually non-existent, and pregnant workers are frequently dismissed under various pretexts. Although informal-sector women workers are eligible to receive a maximum of BDT 25,000 in maternity benefits from the Labour Welfare Foundation,[18] the lack of awareness and outreach prevents most from accessing this support.

To ensure universal maternity protection, the Labour Reform Commission recommends the following:

a) A minimum of six months' paid maternity leave should be guaranteed for all women workers—public, private, formal, and informal— in order to harmonise existing disparities. For formal-sector workers, where employers may face financial constraints, the existing four-month paid leave under the Labour Act may be supplemented by an additional two months of income support from a central maternity fund or through social protection schemes.

For women workers in the informal sector and those who are self-employed, a government-administered special scheme or maternity insurance system should be introduced. The State must play an active role in ensuring implementation while adopting supportive laws and welfare mechanisms that do not discourage women's employment opportunities.

b) Explicit legal provisions should be introduced to prohibit dismissal workers during pregnancy and maternity leave, thereby to safeguard maternity protection and labour rights. These provisions should align with ILO Convention No. 111 (Discrimination – Employment and Occupation, 1958) and Convention No. 183 (Maternity Protection, 2000).

[18] Bangladesh Labour Welfare Foundation Act, 2006, S.R.O. No. 347-Law/2010, dated 14 October 2010, Section 4(6).

3.7.3 Elimination of Wage Disparities

Although the Constitution guarantees *equal pay for equal work*, gender-based wage disparity persists in Bangladesh. According to national surveys, women earn approximately 25 per cent less than men. The average monthly income for men stands at BDT 14,489, compared to BDT 10,831 for women — clearly reflecting income inequality across all sectors, including agriculture, industry, and services.[19]

Gender-based wage disparity is even more pronounced in agriculture and other informal sectors, where the national gap between male and female wages is nearly 50 per cent. A significant source of pay inequality in Bangladesh lies within the government's graded pay structure, where the gaps in salary and benefits between Grade 1 and Grade 20 are disproportionately large and inconsistent. Temporary and outsourced workers performing the same tasks as permanent employees are often denied equivalent pay, allowances, and benefits, and are kept in temporary positions for prolonged periods. There are currently no specific provisions in the Labour Act to address such inequities.

The Labour Reform Commission makes the following recommendations to eliminate wage disparities across all workplaces:

a) **Policy Review and Reform:** A comprehensive review and reform of existing policies should be initiated to ensure *equal pay for work of equal value* for female workers across both formal and informal sectors. In determining piece-rate or contract-based wages, due consideration must be given to natural differences in physical capacity, as well as women's legal entitlements — such as exemptions in weight-bearing tasks, piece-rate targets, and the right to lighter work during pregnancy.

b) **Legal Provisions:** Existing labour laws should be amended to incorporate effective and enforceable remedies for wage discrimination.

c) **Institutional Strengthening:** It is necessary to strengthen the capacity of the proposed National Minimum Wage Board by ensuring the inclusion of women members, and by clearly defining the Board's authority, accountability, and responsibilities in addressing wage inequality.

3.7.4 Elimination of Discriminatory Practices against Women

Although Articles 27, 28, and 29 of the Constitution prohibit gender-based discrimination, women and marginalised groups in Bangladesh continue to face structural barriers that limit their economic participation and access to opportunities. Social perceptions surrounding women's "respectable" forms of employment, alongside issues of violence, insecurity, and limited access to formal employment, constrain women's economic engagement. Despite the national emphasis on

[19] Bangladesh Bureau of Statistics, Bangladesh Labour Force Survey 2023.

wage employment as a driver of economic growth, women's unpaid and "invisible" labour[20] is rarely recognised as *work* and is often undervalued[21].

Due to such economic inequalities, Bangladesh ranks 146th in the *Global Gender Gap Index* under the sub-index of *Economic Participation and Opportunity* — behind Nepal (136th) and Sri Lanka (124th).[22] This hinders progress towards the objectives of CEDAW and SDGs 1, 5, 8, and 5.4, which emphasise recognition and valuation of unpaid care and domestic work.

Workplace discrimination affects not only individual workers but also their families and communities. It limits women's access to decent employment, fair wages, and career advancement, thereby reinforcing long-term economic dependency.

The Labour Reform Commission proposes the following measures to eliminate discriminatory practices against women:

a) **Gender Policy Implementation:** Each public and private workplace must develop and effectively implement a gender policy, supported by appropriate national guidelines.

b) **Capacity Building of Inspectors:** The Department of Inspection for Factories and Establishments (DIFE) should provide gender-sensitivity training for its inspectors, and adopt policies to ensure recruitment and promotion of women inspectors on a priority basis.

c) **Recognition of Unpaid Care Work:** Unpaid care and domestic work performed by women should be formally recognised as *work* at the national level. Necessary steps must be taken to address gender-based division of such labour. Economic development indicators should include measures of unpaid care work. Development of care-related sectors should be prioritised to reduce and redistribute the burden of such work through improved infrastructure, use of technology, and by encouraging men's participation. Additionally, health, nutrition, and social protection for caregivers must be ensured.

d) **Awareness and Behavioural Change:** It is necessary to launch nationwide awareness campaigns to challenge discriminatory social norms and attitudes that restrict women's participation in the labour market. These campaigns should specifically promote women's competence, fair wages, and address misconceptions stemming from gender stereotypes.

e) **Respectful Conduct at Work:** It is worthwhile to introduce policies mandating the use of respectful forms of address ('apni' instead of 'tui' or 'tumi') in all workplaces to ensure dignity and professionalism. The use of indecent language or discriminatory forms of address based on class, gender, or other biases must be strictly prohibited. The term *"nari"* (woman) should replace

---

[20] BBS, UN Women (2023) Report on Time Use Survey 2021

[21] **Bayes, Abdul (2024).** *Obhyontorīṇ utpādone onupasthit nārīr obodan* [The Contribution of Women Absent in Domestic Production]. *Banik Barta*. **Anam, Shaheen (2019).** *Nārīder betānhīn kājer swīkṛti chāi* [We Demand Recognition of Women's Unpaid Work]. *Prothom Alo*.

[22] World Economic Forum (2023) Global Gender Gap Report.

"mohila" (female) in all labour legislation to ensure linguistic and conceptual equality in recognising women's labour.

f) **Representation in Education and Media:** Policies should be adopted to include the history of women's roles in labour movements and economic development in textbooks and the media, fostering a culture of respect for workers and appreciation of women's contribution to the economy.

g) **Legal Reform and Compliance with ILO Conventions:** The proper authority should conduct a comprehensive review of all labour-related laws and regulations to identify and amend gender-discriminatory provisions. This process should be guided by the principles of ILO Conventions No. 100 (Equal Remuneration, 1951), No. 111 (Discrimination in Employment and Occupation, 1958), and No. 190 (Violence and Harassment, 2019). For example, while Section 332 of the Labour Act addresses indecent behaviour towards women, it does not provide specific measures to prevent gender-based violence or harassment at the workplace. The *2009 High Court directives* in this regard should be taken into account when amending the Act. Similarly, Section 345, which only refers to wage discrimination, should be revised to ensure effective implementation, particularly within the informal sector.

3.7.5 Elimination of Gender-Based Violence and Harassment in the Workplace

Gender-based violence and harassment at the workplace undermine women's rights, security, and economic opportunities. In most cases, women work under male supervision, which creates power imbalances and heightens the risk of harassment.

Section 332 of the Bangladesh Labour Act, 2006 prohibits indecent behaviour towards women in the workplace, while Section 307 provides for general penalties of up to three months' imprisonment or a fine of up to BDT 25,000. However, enforcement of these provisions remains weak, and very few cases have been registered in the labour courts. The use of the term *"decency"* in Section 332 reinforces patriarchal notions, often leading to character scrutiny of complainants in sexual harassment cases.[23] Although the 2022 amendment to the Labour Rules (Rule 361A) made it mandatory for workplaces to establish complaint committees, the directives of the 2009 High Court judgement have not been fully implemented. While the Labour Rules define sexual harassment, the Labour Act itself still lacks a clear and comprehensive definition. Bangladesh has yet to enact a dedicated and effective law for the prevention of gender-based violence and harassment in the workplace.[24] Limited access to justice and inadequate support mechanisms for

[23] Yasmin, Taslima (2021) Laws against Sexual Harassment: Analyzing the legal framework of Bangladesh.

[24] Yasmin (2021)

victims further exacerbate these challenges. Survivors face numerous obstacles, including high legal costs, lengthy trial processes, and discriminatory behaviour by law enforcement agencies. [25]

Gender-based violence and harassment create unsafe work environments, adversely affecting women's physical and mental well-being. This results in psychological distress, fear of retaliation, and job insecurity, ultimately diminishing motivation and restricting women's participation in the labour force.

Recommendations of the Labour Reform Commission:

a) The Labour Act should incorporate separate definitions of *sexual harassment* and *gender-based violence* in accordance with the 2009 High Court directives. The complaint committees, as mentioned in the amended 2022 Rules, should be established following those directives, and relevant criminal laws should be reformed to address gender-based violence.

b) Section 332 of the Labour Act, which deals with the composition of committees addressing misconduct towards women, should be reviewed. Each committee should include two additional members who are gender experts, alongside representatives from workers and management.

c) Bangladesh should ratify ILO Convention No. 190 (Violence and Harassment Convention, 2019) to strengthen its commitment to eliminating violence and harassment at work.

d) Preventive measures must be introduced in sectors and occupations where the risk of violence and harassment is comparatively high—such as night shifts, nursing, and call centres.

e) The Government must play an active role in ensuring accessible and effective complaint and redress mechanisms for victims of sexual harassment in workplaces, during commutes, and in public spaces. Awareness-raising activities should be conducted across both formal and informal sectors to familiarise women with complaint procedures. These mechanisms must be respectful, easily accessible, and guarantee protection and justice for victims. In addition, strong regulatory and punitive measures should be adopted to prevent sexual harassment in public transport and crowded places, accompanied by awareness campaigns at national and community levels, particularly in labour-intensive areas.

f) Trade unions and federations must be required to form effective anti-harassment committees, including women in leadership roles, and to adopt and implement institutional gender policies.

g) Local administrations and law enforcement agencies should assess and implement measures to ensure safety in public and industrial areas, such as installing CCTV cameras and developing community-based support structures.

---

[25] Citizen's Platform for SDGs, Bangladesh (2024); Yasmin, Taslima (2024). "Narir Jonno Nyaybicharer Pothe Ekhono Jeshob Badha," (The Barriers that Still Hinder Women's Access to Justice), *Prothom Alo*; Karmojibi Nari (2021); Begum & Saha (2017) Women's Access to Justice in Bangladesh: Constraints and Way Forward

h) Institutional accountability mechanisms must be strengthened to ensure a gender-sensitive justice system. Women's participation should be increased at every stage of the judicial process, and coordinated institutional reforms should be undertaken.

i) Men and boys should be engaged through educational and social programmes to challenge harmful gender stereotypes and promote behavioural change to reduce violence against women.

j) The safety and dignity of all Bangladeshi women workers abroad must be ensured. Embassies should take proactive steps to guarantee the payment of all contractual entitlements, provide appropriate pre-departure training, and establish emergency hotlines, legal assistance, counselling, and shelters in destination countries. Priority should be given to employment in countries that strictly adhere to international labour standards. Severe penalties should be imposed to combat human trafficking disguised as female labour migration.

3.7.6 Elimination of Discrimination in Promotion

Gender-based discrimination in promotion continues to hold women back in the workplace. Within the same industry, there are evident disparities in the allocation of roles and responsibilities between men and women. For instance, in the ready-made garment sector, women are mostly concentrated in low-skilled positions, with limited representation in higher-paying or managerial roles. This results in an undervaluation of women's skills and qualifications. Underlying causes include negative stereotypes about women's leadership abilities, limited access to training, and an unsupportive work environment. According to the concept of *Substantive Equality* promoted by CEDAW, achieving equality requires more than identical treatment—it demands recognition of biological differences and structural inequalities.

Recommendations of the Labour Reform Commission:

a) As discrimination persists in promotions and job allocations, there should be a promotion policy framework that ensures timely advancement for all employees—regardless of gender, ethnicity, religion, or caste—based solely on merit and without discrimination.

b) Alongside merit-based criteria for promotion, the inclusion of quota-based measures for women at managerial and supervisory levels should be considered to guarantee their fair representation. The active engagement of senior management should be encouraged to enhance the effectiveness of such initiatives. These measures can significantly improve women's representation and serve as a concrete step towards achieving *substantive gender equality* in the workplace.

c) A **public recognition mechanism** should be established to acknowledge employers who take positive action to ensure equitable participation of women across occupational levels. This would help disseminate good practices and inspire other institutions to follow suit.

3.8 Child Labour, Adolescent Workers and Forced Labour

The State has both national and international commitments to eradicate child labour, adolescent labour and forced labour. The Constitution of Bangladesh obliges the State to protect children and to develop them as educated human resources by ensuring free and compulsory education for all children. The Constitution contains explicit directions for the prohibition of forced or coerced labour. Article 34(1) of the Constitution states: " All forms of forced labour are prohibited and any contravention of this provision shall be an offence punishable in accordance with law."

National labour policy (2012) states that the Government will discourage the engagement of children in any form of work across both formal and informal sectors, in urban and rural areas. The core principles of the National Child Policy (2011) are to secure child rights in line with the Constitution and international instruments, to eradicate child poverty, to eliminate all forms of violence and discrimination against children, and to eliminate of all forms of violence and discrimination against the girl child, and to ensure the holistic protection and best interests of the child by incorporating children's participation and views in relevant measures. The National Child Labour Elimination Policy (2010) aims to withdraw children from hazardous and the most harmful forms of labour and to bring positive change to their lives.

The Bangladesh Labour Act contains a separate chapter on child labour; under this law, employment of children under 14 years of age is completely prohibited, and hazardous work is prohibited for persons under 18 years (see Section 34). The Children Act 2013 specifically sets out provisions relating to the definition of a child, the protection of child rights, and safeguards against child labour, trafficking, and abuse. It defines all persons under 18 years as children and provides for stringent measures against child labour, abuse, trafficking and exploitation. In addition, the International Labour Organisation has adopted key Conventions to prevent child labour and to safeguard children in the workplace. Under ILO Convention No. 138 (Minimum Age Convention, 1973), a minimum age for admission to employment is established to prevent the recruitment of children below the prescribed age.

The Government's Decent Work Country Programme for Bangladesh (2022–2026) prioritises the creation of child-labour-free workplaces, the provision of appropriate education for children and arrangements for their rehabilitation. Under the National Plan of Action to Eliminate Child Labour (2020–2025), the Government has committed to eliminate all forms of child labour by 2025.

In respect of child labour, adolescent workers and forced labour, the Commission makes the following recommendations:

3.8.1 Minimum Age for Employment

a) In view of Bangladesh's national commitments and targets for the elimination of child labour, the requirements associated with LDC graduation, and the achievement of the Sustainable Development Goals, and with a view to building a dignified and skilled workforce for the future, the minimum age for admission to employment should be raised to 16 years by 2030.

b) Adolescents aged 16–18 may be permitted to engage in work that affords adequate opportunities for skills development and creative growth. Standards for skills development and opportunities for creativity should be prescribed by regulation. The Ministry of Labour, the Ministry of Social Welfare, and the Ministry of Women and Children Affairs should work in a coordinated manner in this regard.

3.8.2 The Right to Quality Education and Access to Technical Skills

a) Responsible and accountable mechanisms should be established to ensure prpoer implementation of the existing law on compulsory primary education. To guarantee free, quality education for children from economically disadvantaged and working families up to at least the secondary level, the State should provide educational essentials (textbooks, notebooks, pens, pencils and other learning materials) at no cost.

b) In areas where primary schools or adequate opportunities for quality education are not available, rapid action must be taken to establish schools to secure the right to quality education. Upon completion of the compulsory education period, consideration may be given—based on the child's and family's interest and needs—to approved vocational/technical training or to authorised employment.

c) All public and private schools should be brought into child-labour-elimination programmes and assigned clear, target-based responsibilities for "rehabilitation from work to schooling." As part of this rehabilitation, a specified number of children or adolescent workers should be provided free places in both public and private schools.

d) Accessible and quality work-oriented technical education must be made available to adolescent worker groups to develop a skilled, competency-based workforce. A standardised curriculum for skills development should be developed and it should be approved jointly by the Ministry of Labour, the Ministry of Social Welfare and the Bangladesh Technical Education Board (BTEB). Technical curricula must be prepared and regularly updated in line with current and future labour-market skills and demands. Such technical training should be completely free and easily accessible. Local business communities, as part of their corporate social responsibility, may initiate community-based technical training for adolescent workers in their localities.

e) Clear punitive precedents must be established to prevent deprivation of access to quality education, discrimination, neglect, fraudulent practices that deprive children of their rights, or any actions that obstruct children's acquisition of education and skills.

3.8.3 Monitoring and Inspection of Labour Standards

Ensuring international child labour standards, fundamental principles and rights at work, and enhanced workplace welfare in legally permitted employment for adolescents is of critical importance. Although existing legislation allows for the employment of adolescent workers, it is

essential that the Department of Inspection for Factories and Establishments (DIFE) plays a proactive and accountable role in verifying whether such conditions are being met. This includes ensuring appropriate working environments, working hours, rest periods, leave entitlements, wages, and other legally mandated benefits.

In order to establish a monitoring and inspection mechanism for labour standards, the Labour Reform Commission recommends the following measures:

a) In addition to monitoring and inspection of child labour in formal industries, a specialised child labour inspection unit may be established under the DIFE to ensure the protection of child and adolescent workers in the informal sector. This specialised unit must be authorised to conduct inspections at any time in any workplace or factory across Bangladesh.

b) The regular monitoring and inspection of child labour may be incorporated into the responsibilities of probation officers under the local Social Welfare Offices.

c) The National Child Labour Welfare Council and district-level Child Rights Monitoring Forums shall ensure regular public disclosure of their respective activities. Each forum must identify its progress, challenges, and shortcomings, and designate one or more accountable individuals who will report to the appropriate authorities.

d) At each level, the activities undertaken by the competent authorities for the elimination of child labour and their outcomes should be regularly reviewed, and, where necessary, effective measures should be taken to identify and address limitations and constraints on a continuous basis. At least once a year, authorities could present a comprehensive progress report to stakeholders, engage in dialogue with them, and seek cooperation where required.

e) A joint task force comprising the Ministry of Labour and Employment, the Ministry of Social Welfare, and the Ministry of Women and Children Affairs may be established to ensure child labour elimination and the rehabilitation of affected children.

3.8.4 Responsibility, Accountability and Penalty

To ensure the elimination of child labour, it is necessary that the law explicitly defines the duties and liabilities of not only the State's responsible institutions but also of employers and parents or guardians. The Labour Reform Commission recommends the following:

a) It is necessary to ensure the imposition of exemplary penalties, under a zero-tolerance policy, against those who violate child labour laws and standards or exploit children socially and economically. In appropriate cases, provisions may be made for the temporary suspension of business operations up to the permanent cancellation of registration.

b) To make the process of employing children accountable, a clearly defined mechanism should be established jointly by the Ministry of Social Welfare and the Ministry of Women and Children

Affairs. The mechanism should ensure that or employer shall be allowed to engage a child in employment without prior permission from the designated authority.

c) Parental consent for child employment should be regulated. Prior to granting such consent, parents should consult with and obtain advice from the competent authority. Only if no viable alternative is found may the authority permit such employment in accordance with prescribed procedures. Both parents and the approving authority will be held liable for any breach or negligence.

d) Penalties for violations of child labour laws must be strengthened and rigorously enforced.

3.8.5 Protection Measures for Poor Families

a) Conditional programmes that prevent child labour should be developed through the coordination of existing social protection initiatives. A clearly defined process should be established to ensure impartial and appropriate beneficiary selection.

b) The level and coverage of social protection should be determined in such a way as to reduce financial dependence on children; "Food for Education" programmes should be adopted to encourage the participation of children from poor and working families in education.

c) To ensure every child's right to education, community-based social safety funds may be established. Wealthier and more affluent members of society should be encouraged, as part of their corporate and social responsibility, to contribute to the education and health protection of disadvantaged children.

d) In all industrial and labour-intensive zones, community-based childcare centres, vocational schools, skill development and training centres, and medical facilities may be established. These can be operated through public support in partnership with business enterprises under their Corporate Social Responsibility (CSR) initiatives.

e) Investment in community-based welfare initiatives within industrial zones should be encouraged. CSR activities undertaken in labour welfare sectors should be eligible for tax incentives, and this provision should also extend to small and medium-sized enterprises (SMEs).

3.8.6 Considerations in the Preparation of the Action Plan and Evaluation of Previous Activities

For the effective prevention and elimination of child labour, policy planning must take into account regional, socio-economic, geographical, and occupational diversity. In practice, most previous initiatives have neglected these factors. As a result, in most cases, the implemented programmes have not been able to make any significant contribution to addressing child labour. Moreover, the

lack of proper evaluation of past initiatives has led to repetitive and inefficient spending over the years.

The Labour Reform Commission therefore recommends:

a) National-level child labour elimination plans should be developed based on field-level realities and evidence, reflecting the actual extent, nature, and types of child labour. Priority should be given, within the child labour elimination action plan, to the eradication of child labour in the informal sector and the protection of the rights of adolescent workers.

b) All previous government initiatives and programmes should be thoroughly evaluated and reviewed to identify progress, achievements, and the specific causes of failure in meeting set targets, with lessons integrated into future planning.

c) Formulation of national-level action plans should be guided by tripartite social dialogue and, where necessary, broader stakeholder consultation. The roles and responsibilities of each stakeholder should be clearly defined to ensure accountable and participatory implementation.

3.8.7 Regular Updating of Hazardous Work List

To ensure the regular updating of the list of hazardous occupations, the Labour Reform Commission recommends:

a) Many occupations in Bangladesh may not appear hazardous at first glance but become dangerous due to poor working environments, excessive hours beyond contract terms, exploitation, abuse, and violations of basic labour rights. During the updating of the hazardous work list, tasks that hinder children's development should also be included as hazardous. Such tasks should be identified and the hazardous work list should be updated accordingly, with particular consideration given to the risks and challenges faced by female adolescent workers in the assessment.

b) Strict penalties must be imposed on those who employ children in hazardous work in violation of the law.

c) The government-approved list of hazardous occupations should be formally incorporated as a schedule of the Labour Act.

3.8.8 Responsible Business Conduct

In addition to existing international policy frameworks, the elimination of child labour and forced labour is a central concern in the United Nations Guiding Principles on Business and Human Rights, as well as in international, regional, and country-specific human rights due diligence laws and guidelines. To avoid export restrictions, both the state and primary export-oriented factory owners or business entities must demonstrate enhanced responsibility and take proactive measures

to ensure that workplaces across labour-intensive sectors and supply chains—including domestic direct and indirect suppliers—are free from child labour and forced labour.

The Labour Reform Commission recommends:

a) All export-oriented industries must ensure transparency in their reputation and human rights practices by keeping not only their own factories but also those of their direct and indirect suppliers within the supply chain completely free from child labour and forced labour.

b) Each factory shall conduct regular inspections and submit reports to ensure that both its own operations and all factories with which it maintains business relationships are free from child labour and forced labour.

c) Authorised national or government-approved bodies must be provided with full access for inspections and cooperation in preparing reports as required.

3.8.9 Elimination of Forced Labour and Modern Slavery

All forms of forced or compulsory labour are strictly prohibited under national and international labour standards, laws, and policies. Article 34 of the Constitution of Bangladesh explicitly forbids forced labour, declaring any violation illegal and punishable by law. The Prevention and Suppression of Human Trafficking Act, 2012 also identifies forced or servitude-based labour as a criminal offence. According to the ILO Forced Labour Convention, 1930 (No. 29), forced labour refers to "all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily."[26]

Despite the existence of relevant laws, instances of forced labour and modern slavery persist in Bangladesh. As reported by the Global Slavery Index (GSI) 2023, conducted by the Australia-based organisation *Walk Free Foundation*, an estimated 1.2 million people were living in modern slavery in Bangladesh in 2021 — approximately 7.1 per 1,000 persons. Alarmingly, Bangladesh is among the ten countries with the highest prevalence of modern slavery among 27 countries in the Asia and Pacific region. Furthermore, Bangladesh ranks 58th among 160 countries globally in terms of the extent of modern slavery.[27]

By ratifying the International Labour Organisation's Forced Labour Convention, 1930 (Convention No. 29), the Abolition of Forced Labour Convention, 1957 (Convention No. 105), and the Protocol of 2014 to the Forced Labour Convention, 1930, the Government of Bangladesh has assumed key responsibilities and obligations relating to the elimination of forced labour, the

[26] GoodWeave International. (2025). *Modern slavery and child labour in the RMG sector of Bangladesh: Report.* Retrieved from https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf

[27] https://www.walkfree.org/global-slavery-index/country-studies/bangladesh/

protection of workers, and the promotion of awareness on these issues. Against this background, the following recommendations are proposed to eradicate forced and modern slavery:

a) The Bangladesh Labour Act should explicitly define *forced labour* and *modern slavery*, incorporating clear and enforceable penalties. Although forced labour is prohibited under the Constitution, Penal Code, EPZ Act, and Human Trafficking Act, the Labour Act lacks specific provisions and definitions aligned with international norms. In line with international laws, standards, and policy frameworks, it is necessary to incorporate a comprehensive definition of forced labour in the Bangladesh Labour Act, alongside a specific definition of modern slavery.

b) Hazardous labour sectors in both the formal and informal economies—where forced labour and modern slavery exist or are likely to exist—should be identified through surveys and classified as high-risk. Priority sectors should be addressed through the adoption of a time-bound and effective national action plan to eliminate forced labour and modern slavery. All national-level interventions in this regard should be results-based and verifiable, with clearly defined mechanisms to ensure accountability of responsible actors.

c) Export-oriented industries, along with their informal and indirect supply chain actors, should be identified, and necessary measures should be taken to ensure the elimination of all forms of forced labour and modern slavery. To ensure sustained, uninterrupted, and competitive participation as a supplier in the global export market, relevant enforcement agencies—such as the Department of Inspection for Factories and Establishments—should be more proactive in eliminating forced labour and modern slavery. In particular, inspection checklists should be updated in line with modern slavery indicators.

d) Socio-economic, cultural, geographic, and climate-related risks faced by workers in sectors vulnerable to forced labour must be assessed to mitigate exploitation and deprivation, and access to appropriate social protection measures must be ensured accordingly.

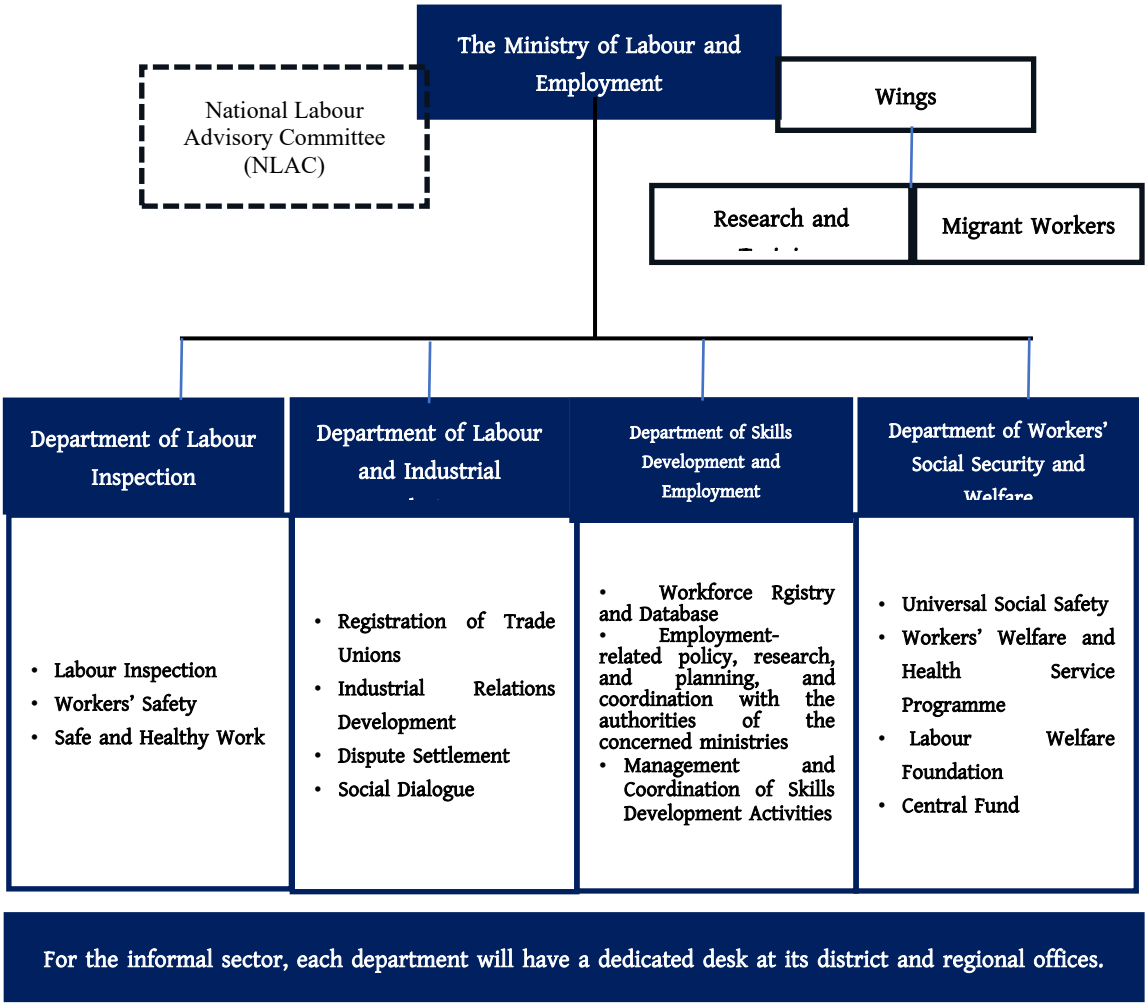
e) To prevent human trafficking and protect prospective international migrant workers from forced labour, mechanisms should be adopted to ensure the accountability of domestic recruiting agencies, requiring them to regularly submit reports to the government on the status of each worker recruited through them.

4. Proposals Institutions Related to the Labour Sector

Ensuring a productive, discrimination-free, exploitation-free, decent, safe, and healthy working environment for all able citizens, and upholding workers' rights and the dignity of labour in all spheres, constitute the core objectives of the *National Labour Policy*. The Ministry of Labour and Employment plays the central role in achieving these objectives. According to its *Rules of Business*, as well as relevant policy frameworks such as the *National Labour Policy 2012* and the *National Employment Policy 2022*, the Ministry is entrusted with the responsibility of promoting decent work, improving workers' rights and living standards, and aligning both formal and informal sectors with international labour standards. However, a comprehensive legal and policy framework to implement these objectives has not yet been formulated.

To reform the labour sector, the Commission places at its centre a proposal to transform the Ministry of Labour and Employment into an effective and dynamic institution that reflects the aspirations of working people, the views of stakeholders, and the broader expectations of the public. The proposed reforms will be universal in scope, ensuring that the evolving and diverse nature of the labour market is duly addressed. These reforms aim to guarantee rights related to trade unions and industrial relations, decent work, social protection, employment, representation, and equality, while also strengthening workplace safety.

Particularly to ensure protection and welfare for all categories of workers (formal, informal, and self-employed) by reorganising the functions of the Ministry of Labour and Employment and its affiliated departments and agencies through structural reforms, enhancement of institutional capacity, and effective accountability — the Labour Reform Commission makes the following specific recommendations:



4.1 Ministry of Labour and Employment

Structural Reform

To achieve a more balanced distribution of responsibilities among its affiliated departments, the Labour Reform Commission recommends reorganising the Ministry of Labour and Employment's operations through a total of four departments, in accordance with the framework illustrated in the above diagram. This would involve renaming the two existing departments — the Department of Inspection for Factories and Establishments and the Department of Labour — and establishing two new departments.

4.1.1 Department of Labour Inspection

a) The existing Department of Inspection for Factories and Establishments should be renamed the Department of Labour Inspection. Dedicated offices or secretarial desks of this department should be established at divisional, district, and sub-district levels. Its principal mandate will be to conduct inspections and ensure safe and healthy working conditions for all workers.

b) The Department of Labour Inspection's area of responsibility should extend to workers in the informal sector, ensuring that they are covered under labour laws and regulations, and guaranteeing their rights as well as occupational safety and health .

c) Until departmental offices are established at district and sub-district levels, or where no formal complaint-handling mechanism exists, authorised personnel from the district administration, sub-district administration, or the Department of Labour shall take responsibility for:

- Developing occupational health systems
- Protecting the rights of child and domestic workers
- Ensuring remedial action for violations
- Safeguarding fundamental labour rights across sectors including agriculture, such as employment contracts, safe and healthy working conditions, compensation, and protection from violence or harassment

d) A centralised digital platform should be developed for inspections and reporting. Advanced tools must be employed to collect and analyse data in real time.

e) In line with the Fourth Industrial Revolution, the inspection system of DIFE should be modernised, with sector-specific standard checklists and separate policies developed for different industries.

f) Measures should be taken to address staffing shortages, fill vacant posts, and resolve promotion-related complexities for inspectors, thereby enhancing departmental efficiency. Labour inspectors should be legally empowered, and the authority to operate mobile courts should be extended to cover the construction sector and other informal sectors.

4.1.2 Recommended Structure and Functions of the Directorate of Labour and Industrial Relations

- The existing *Department of Labour* should be renamed as the Directorate of Labour and Industrial Relations. Its primary mandate will be to promote harmonious industrial relations, ensure effective coordination among stakeholders, and facilitate dispute resolution and social dialogue.
- To safeguard and promote workers' rights, Divisional Labour and Industrial Relations Offices should be established across administrative divisions, taking into account areas

with high concentrations of industries and workers. In parallel, the number of Regional Labour and Industrial Relations Offices should be increased through the creation of new regional offices under each divisional office, alongside necessary expansion of manpower.

- The Directorate should play an active role in the registration of informal sector workers' organisations, resolution of industrial disputes, and mediation between employers, authorities, and communities. It should also ensure dialogue, consultation, representation, and collective bargaining for workers in the informal economy.
- To prevent industrial unrest, the Directorate must adopt an action plan for regular consultations and proactive conflict-resolution measures.
- Policies should be developed and implemented to introduce alternative dispute resolution (ADR) mechanisms. For effective implementation of the arbitration process, the panel of arbitrators should be updated every two years in coordination with the Ministry.
- The Directorate should introduce an IT-based Labour Information Management System to simplify the processes of trade union registration and grievance redress.
- Rationalisation of the Directorate's organisational structure, removal of complexities in the promotion system, and introduction of basic and specialised training programmes for officials are essential.

4.1.3 Recommended Structure and Functions of Directorate of Skills and Employment Development

At present, there is no visible initiative within the Ministry of Labour and Employment specifically dedicated to employment creation and protection. The Labour Reform Commission considers the Ministry's proposal to establish a Directorate of Employment both realistic and timely. However, the Commission recommends that the proposed directorate be upgraded as the Directorate of Skills and Employment Development.

The proposed Directorate will undertake the following functions:

a) Developing a competent and employable workforce suited to the needs of the labour market by assessing Bangladesh's current employment situation, socio-economic conditions, and future challenges in the world of work.

b) Enhancing workers' awareness of skills development, promote acquisition of technical knowledge, and strengthen technology-based skills and capabilities to facilitate new employment opportunities.

c) Formulating and implementing programmes on vocational training, skills development, and reskilling, with the objective of creating a competitive workforce and aligning education with

labour market demands. These programmes should be conducted in coordination with industries, educational and technical institutions, and employers' and workers' organisations.

d) Implementing apprenticeship regulations and policies, provide career guidance services, and promote lifelong learning initiatives to ensure that the workforce can adapt to technological transitions.

e) To Bring the skills development division and functions of the Bureau of Manpower, Employment and Training (BMET) under the purview of this Directorate, thereby progressing towards national-level skills development togetger with overseas focussed skill development. Coordination between the Ministry of Labour and Employment and the Ministry of Expatriates' Welfare and Overseas Employment should be ensured for developing the skills of migrant workers.

f) Under the proposed Directorate of Skills and Employment Development, the following activities may be undertaken:

- Mapping of labour market demand, skills, and employment opportunities both domestically and internationally;
- Maintaining regular liaison and communication with the Ministry of Education and relevant educational institutions, as well as effective coordination with related ministries;
- Strengthening collaboration with industry-based employers' and workers' organisations, public and private skills development authorities, and business associations;
- Planning and implementing extensive entrepreneurship development programmes;
- Focusing on sustaining employment through training and retraining, developing future-ready modern skills, improving quality of work, and ensuring skills certification;
- Conducting regular research to develop a comprehensive database of employment opportunities at home and abroad.

Labour Information Repository

The Labour Information Repository, as proposed by this Commission (see Section 3.1), shall be administered under the Directorate of Skills and Employment Development. It will serve all categories of workers — formal, informal and self-employed — by ensuring access to comprehensive data and identity verification.

The repository will contain not only personal information of all workers but also detailed data on their skills and training, employment history, employer details, industrial sector information, information on financial support providing institutions, records of occupational accidents, and district-wise employment statistics.

4.1.4 Directorate of Workers' Social Protection and Welfare

The Ministry of Labour and Employment currently implements several fragmented initiatives aimed at ensuring social protection for workers. However, these activities have yet to be institutionalised within a permanent and coordinated framework. To guarantee social protection and welfare for all workers, it is essential to transform these initiatives into a sustainable and organised institutional structure.

With this objective in view, the Labour Reform Commission recommends the establishment of a Directorate of Workers' Social Protection and Welfare under the Ministry of Labour and Employment. The proposed Directorate will oversee the Labour Welfare Centres, the Bangladesh Labour Welfare Foundation, and the Central Fund.

In addition, the Directorate shall be entrusted with the following responsibilities:

a) Implementing universal social protection programmes for workers and managing worker-specialised hospitals;

b) Administering activities related to social and health insurance, workers' provident funds, universal maternity protection, and the inclusion of workers in the universal pension scheme, as proposed under the social protection and welfare section;

c) Coordinating the implementation of worker-related social protection activities currently operated by other ministries. The relevant budget allocation for such activities should be made in favour of the Ministry of Labour and Employment.

For the protection and welfare of workers in the informal sector, separate offices or service desks of the Directorate shall be established at the district and upazila (sub-district) levels. In cases where such offices or desks do not exist, the government may assign the implementation of social protection activities to the respective district or upazila administration.

Labour Welfare Centres

The Labour Welfare Centres primarily aim to ensure the welfare of workers. Accordingly, the Labour Reform Commission recommends bringing these centres under the proposed Directorate of Workers' Social Security and Welfare, and addressing their longstanding operational constraints through the following short-term and long-term measures:

Short-Term Recommendations

a) In coordination with the Ministry of Health, the Labour Welfare Centres should be formally recognised as institutions providing healthcare services to workers. Their referrals or

recommendations for advanced treatment from other hospitals should be given due official consideration.

b) Ensure that all categories of workers, both formal and informal, have access to healthcare services from the Labour Welfare Centres.

c) Strengthen and expand the existing centres to guarantee the workers' right to health services by increasing the number of doctors and staff, establishing one centre in each district (and multiple in industrial zones), and improving physical infrastructure.

d) Doctors should be recruited from the BCS Health Cadre for the Labour Welfare Centres. The currently serving doctors should be accorded cadre status, provided with opportunities for professional training, and given fair prospects for career advancement. The Ministry of Labour and Employment and the Ministry of Health must jointly coordinate to provide such opportunities, including access to advanced training programmes offered by the Directorate General of Health Services.

e) The Labour Welfare Centres should be upgraded to provide primary and emergency care, comprehensive pathology services, advanced diagnostic tools, and specialised outpatient services (e.g. ophthalmology, paediatrics, gynaecology, and mental health).

f) The availability and range of medicines at the Labour Welfare Centres should be significantly increased.

g) Each Labour Welfare Centre must be equipped with an ambulance service and in-patient beds for workers.

h) Ensure the provision of evening-hour healthcare services for workers.

Long-Term Recommendations

a) The Labour Welfare Centres should be renamed "Labour Welfare and Health Service Centres", and an effective coordination mechanism with the Ministry of Health should be developed.

b) Separate the health functions and training functions of the Labour Welfare Centres, and establish worker-specialised hospitals in industrial or labour-intensive zones under the supervision of the health authorities.

c) Expand staffing at labour welfare centres and upgrade their position grades.

d) Establish new Labour Welfare Centres in all labour-dense regions of the country.

e) Ensure universal access to free primary healthcare services for all workers.

f) Promote collaboration with business entities, national and international development partners, and public institutions through CSR programmes to enhance the quality and reach of services.

g) Each Labour Welfare Centre should form a management committee comprising representatives of employers, workers, community members, and local public healthcare providers to oversee and guide its operations.

Bangladesh Labour Welfare Foundation: Recommended Actions

a) Ensure transparency and accountability in all operations by publishing application procedures, approvals, and related information on the Foundation's official website.

b) Give due importance to recommendations and referrals from Labour Welfare Centres when assessing eligibility for assistance.

c) Ensure applications are processed sequentially to eliminate arbitrary or preferential disbursements at the individual level.

d) Accept media reports, validated through local government representatives, as supporting evidence for education- or accident-related claims.

e) Expand the Foundation's funding base by relaxing legal restrictions to allow inclusion of a larger number of establishments.

f) Enable workers to submit applications and receive financial support online, without the need for physical visits to the office.

g) Keep all application and service delivery processes free from political influence to ensure that no worker is deprived of or discriminated against in receiving benefits.

h) Ensure that all applications are resolved within 30 working days.

i) Expand the Foundation's presence through regional offices and accelerate financial assistance operations by forming divisional and regional selection committees.

Central Fund: Key Actions Recommended

a) Ensure the provision of worker-friendly services through the Central Fund. Simplify the application process so that a worker can apply directly using their official identity card.

b) Make all Central Fund operations fully digital to ensure speed, transparency, and accountability in application, verification, and disbursement processes.

c) Establish assistance centres in all factories and industrial zones to support workers in submitting applications.

d) Ensure that all applications are resolved within 30 working days.

e) Introduce necessary reforms in the use of the fund, and discontinue the practice of disbursing workers' outstanding wages from this fund.

4.1.5 Wings of the Ministry of Labour and Employment

The Ministry shall have two internal wings:

1. **Research, Education and Training Wing**, and
2. **Migrant Workers Wing.**

Research, Education and Training Wing

The principal mandate of this Wing shall be to undertake research, education, and training on labour-related issues. This Wing shall be constituted by merging two existing institutions currently under the Department of Inspection for Factories and Establishments (DIFE) and the Department of Labour respectively, namely:

- the *National Occupational Safety and Health and Training Research Institute (NOSHTRI)*, and
- the *Industrial Relations Institute (IRI).*

The Wing will carry out research on labour-related issues and implement updated and need-based education and training programmes. It will work in close collaboration and exchange information directly with relevant ministries, divisions, and departments of the Government.

Industrial Relations Institute (IRI)

Following the Rana Plaza collapse and the Tazreen Fashions fire, despite structural development and modernisation in various ministries and departments driven by both domestic and international initiatives and support, another institution—the Industrial Relations Institutes (IRI) under the Department of Labour—has remained comparatively neglected. While the IRIs could have served as a vital bridge for the development of industrial relations, in reality, due to a lack of prioritisation, only four IRIs continue to operate in a largely invisible manner, with insufficient trainers, weak infrastructure, outdated training curricula, and underdeveloped methodologies. Addressing these structural, programmatic, and operational challenges is therefore essential for enhancing productivity in the industrial sector through labour law training, increasing awareness among workers and employers regarding rights and responsibilities, improving industrial relations,

creating harmonious workplaces, ensuring sustainable labour sector development, and contributing meaningfully to the country's economic growth.

To modernise and strengthen the capacity of the IRIs, the Labour Reform Commission recommends the following measures:

a. Establishment of Industrial Relations Institutes in all administrative divisions based on need, revise the current organisational structure, and the recruitment of an adequate number of qualified trainers.
b. Modernisation of IRI infrastructure to include separate dormitories for male and female trainees, day-care facilities, and accessibility features for trainees with disabilities.
c. Updating training curricula to make them modern and responsive to current needs. It is necessary to include topics such as gender, sustainable and inclusive labour, supply chains, decent work, the Fourth Industrial Revolution, environment and climate change, just transition, and social justice.
d. Introducing industry-specific and demand-driven training courses considering the varying needs of public, private, and industrial sectors.
e. Launching demand-based diploma courses, evening training sessions, and e-learning opportunities at the IRIs.

National Occupational Safety and Health and Training Research Institute (NOSHTRI): Tasks and Responsibilities

a. Developing simplified training modules for workers and organise regular workshops on occupational safety and health (OSH) to strengthen training mechanisms.

b. Introducing incentive schemes through the government or business associations to encourage improvements in OSH practices at factories and establishments.

c. Providing technical training aimed at developing skilled human resources.

d. Establishment and regular operation of NOSHTRI offices in major industrial zones (Dhaka, Gazipur, Narayanganj, Chattogram) to ensure the participation of workers and other stakeholders. It is necessary for NOSHTRI to undertake collabourative research with national universities and international institutions and development partners.

e. Setting up a *Legal Research Cell* under NOSHTRI and establishing a coordination office at its headquarters along with several regional centres to make its contribution to industrial relations development more visible to stakeholders.

Migrant Workers Wing

This Wing shall work to ensure recognition and protection of the rights of migrant workers. It will maintain liaison with the Ministry of Expatriates' Welfare and Overseas Employment and

coordinate with the ILO and other international development partners on issues related to migrant labour.

4.1.6 Special Recommendations

a. Each of the proposed four departments shall establish a dedicated division for informal sector workers to ensure that services are extended to all categories of workers engaged in informal employment.
b. A specialised *BCS (Labour) Cadre* may be introduced for the Ministry of Labour and Employment. Officers of the proposed *Directorate of Labour Inspection* and *Directorate of Labour and Industrial Relations* should have promotional opportunities to the highest positions within their respective organisations.

c. A comprehensive evaluation is necessary to assess how various capacity-building initiatives undertaken by the Ministry of Labour and Employment after the Rana Plaza disaster, with national and international development partners, have contributed to improving workers' rights, working conditions, and the broader socio-economic context.

4.1.7 Accountability, Partnership, and Collaboration

The institutions responsible for ensuring workers' rights operate under the Ministry of Labour and Employment, which is a specialised ministry. Therefore, to uphold the country's image and reputation in labour matters nationally and internationally, strengthening the Ministry's accountability, partnerships, and participatory mechanisms is essential.

To this end, the Commission recommends reforms in two phases:

1. Formation of a *National Labour Advisory Committee*, and
2. Establishment of a *National Labour Commission.*

National Labour Advisory Committee

a. A consultative, review, and monitoring committee comprising representatives of workers, employers, and labour-sector experts shall be constituted. The Committee will facilitate information sharing, communication, coordination, review, guidance, monitoring of welfare activities, and consideration of complaints related to service delivery agencies, with recommendations submitted to the Ministry. The Committee will also review periodic labour situation reports and make recommendations to the Ministry regarding violations of workers' basic rights.
b. Another key function of the Committee will be to provide policy advice on integrating national

policies—such as the National Labour Policy, Occupational Safety and Health Policy, Employment Policy, and Domestic Workers Policy—into legislation. It will also play a role in mobilising all stakeholders in times of national labour crises.

c. The *Directorate of Labour Inspection* and the *Directorate of Labour and Industrial Relations* shall be obliged to submit their reports to this Committee. The Committee will review these reports, provide policy advice, and monitor implementation.

d. The Committee will organise an annual *Labour Convention* and *Social Dialogue Forum.*
e. The proposed composition of the Committee shall include: two workers' representatives and two employers' representatives from the National Tripartite Consultative Council (NTCC); two representatives from trade unions and two from employers' organisations; two members nominated by the Chair of the Parliamentary Standing Committee on the Ministry of Labour and Employment (one from the ruling party and one from the main opposition); and two experts (lawyers, human rights activists, researchers, gender specialists, environmentalists, labour experts, or economists).

f. The Committee will also allow observer participation from the ILO, other international development partners, law enforcement agencies, and interested national labour rights organisations.

National Labour Commission

a. Considering the need for a structured legal process, the Commission proposes the establishment of a *National Labour Commission* as a second-phase reform measure. The proposed composition shall include a Chairperson (a nationally recognised labour law expert), two members nominated by the Speaker from the Parliamentary Standing Committee, one retired senior official from the Ministry of Labour and Employment, one representative each from employers and workers, one expert in labour law, economics, industry or commerce, and one labour researcher.

b. The Commission's primary mandate shall be to oversee implementation of the recommendations of the *Labour Reform Commission 2024*, provide policy advice to enhance the effectiveness of labour law enforcement agencies, and ensure regular coordination with the Parliamentary Standing Committee on the Ministry of Labour and Employment. The Ministry shall serve as the parent ministry for this proposed Commission.

c. The National Labour Commission shall have the legal authority to resolve industrial disputes and address national-level labour crises. It will also handle complaints lodged against the Ministry or its affiliated departments and monitor and review the implementation of the Labour Reform Commission's recommendations.

4.1.8 Strengthening Tripartite Mechanisms and Structures

To ensure the effective functioning and regularisation of all committees under the Ministry of Labour and Employment, including the National Advisory Committee and the Tripartite Consultative Council, it is necessary to establish a dedicated secretariat desk within the Ministry under the charge of a Joint Secretary. This desk will be responsible for facilitating social dialogue among the parties, reinforcing cooperative and constructive engagement, supporting the implementation of committee activities, and maintaining records. All such activities must be executed and coordinated under the supervision of a Director-level officer within the Ministry to ensure operational effectiveness.

4.1.9 National Wages Commission

To harmonise wage determination processes across various occupations and sectors—such as the Wages and Productivity Commission and Lower Wage Boards—necessary legal reforms need to be undertaken to establish a National Wages Commission (for detailed reform proposals, see Chapter 3.2 on Wages and Fair Share). The Commission will consist of three divisions:

- **National Minimum Wage**
- **Sector-based Minimum Wages**
- **Minimum Wages for Specific Professions**

Responsibilities of the Minimum Wage Board

a) Enhancing the legal mandate and capacity of the Minimum Wage Board to enable it to declare a national minimum wage.

b) Giving priority to expertise in wages, productivity, and labour economics when appointing the Chairman and independent members of the Board.

c) Strengthening the Board's capacity to conduct its own research and minimum wage recommendations on the basis of empirical evidence.

d) Ensuring transparency and accountability in the minimum wage determination process by publicly disclosing the basis for wage calculations, methodologies used, and the data/evidence considered for each sectoral recommendation.

e) Reviewing sectoral wages annually, taking into account inflation and other benchmarks, and provide guidance for determining wages required for a dignified standard of living.

f) Updating the minimum wages of the currently defined 42 industrial sectors and expand the coverage to include additional sectors.

Tasks Regarding a Permanent Wages Commission

a) A permanent National Minimum Wages Commission needs to be established, comprising experienced and expert individuals in labour, labour economics, and wage determination, as well as representatives of workers and employers. This Commission will subsume the functions of the Government Pay Commission, the Wages and Productivity Commission, and newspaper wage boards, thereby centralising wage and allowance determination and implementation across Bangladesh. The Commission will annually update and declare minimum wages to ensure a dignified standard of living.

b) One or more Minimum Wage Determination Committees need to be constituted under the Permanent National Minimum Wages Commission to determine sector-wise, and profession-wise minimum wages.

c) Necessary legal reforms and amendments are to be undertaken to incorporate the Commission's structure, functions, and related provisions into the Labour Law.

d) The Commission will have to regularly organise joint consultations with relevant stakeholders on wage-related matters and to publish research-based reports on the benefits of fair wages.

5. Issue-Based Reform Proposals

5.1 Responsible Business Conduct in the Context of Business and Human Rights

The responsibility of commercial or business enterprises with regard to human rights is increasingly recognised globally as a fundamental normative principle. A key framework for conducting business responsibly is Human Rights Due Diligence (HRDD), which requires enterprises to exercise appropriate caution in all aspects of their operations to protect human rights. This involves continuously identifying, preventing, and addressing potential or actual human rights violations. The objective of HRDD is to ensure that corporate activities are conducted in accordance with international human rights and labour standards, maintain transparency regarding human rights protection, and provide accountability to relevant stakeholders. A central aspect of this process is ensuring access to justice or appropriate remediation in the event of human rights violations. HRDD helps enterprises identify, prevent, and mitigate adverse impacts on the human rights of workers, consumers, and others affected by their operations, while clearly explaining how any such impacts are being addressed.

Globally, HRDD is increasingly recognised in law and integrated into national and regional business frameworks, making it particularly relevant for Bangladesh's labour sector, especially for export-oriented industries.

The structured approach to Responsible Business Conduct (RBC) is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs, 2011), which operate on three pillars: Protect, Respect, Remedy. Under the UNGPs, businesses are expected to respect human rights, commit through a formal Policy Statement to prevent negative impacts on workers' rights, undertake appropriate HRDD measures, and provide or facilitate Remediation where violations occur. In addition to the UNGPs, other international instruments that provide guidance on RBC and the protection of human rights and the environment, include:

- UN Global Compact (2000)
- ILO Tripartite Declaration on Multinational Enterprises and Social Policy (MNE Declaration, 1977)
- OECD Guidelines for Multinational Enterprises (1976)
- EU Corporate Sustainability Due Diligence Directive (CSDDD, 2023)

A review of these international and regional policies highlights two primary aspects of RBC relevant for Bangladesh:

1. Human Rights Due Diligence (HRDD)
2. Environmental Due Diligence

In light of RBC principles, the following proposals aim to ensure protection of workers' rights, safety, and access to justice in the workplace, while enhancing Bangladesh's international reputation as a compliant and responsible industrial nation.

a) Development of a National Action Plan (NAP) for Responsible Business Conduct

A comprehensive National Action Plan (NAP) on responsible business should be developed to ensure that business operations respect human rights and environmental standards, while promoting economic and social development. The NAP will provide a strategic framework for identifying, preventing, mitigating, and remedying human rights and environmental violations. This is particularly critical for protecting human rights in Bangladesh's industrial sector and improving the country's reputation in international export markets.

The NAP can be developed and implemented under the leadership of the Ministry of Labour and Employment, through a task force comprising representatives from:

- Ministry of Law, Justice and Parliamentary Affairs
- Ministry of Industries
- Ministry of Commerce
- Ministry of Finance
- Other relevant ministries
- Employer associations and brands
- Trade unions
- Civil society organisations
- Subject-matter experts

b) Integration of HRDD Framework into Labour Law

Integrating the HRDD framework into labour legislation will create a legal obligation for industries to follow human rights due diligence processes. Legally mandated HRDD will:

- Identify actual and potential human rights risks in industrial operations
- Mitigate identified risks through managerial and operational measures
- Develop policies and management systems to prevent, mitigate, and remedy adverse impacts

- Monitor and evaluate the progress and outcomes of HRDD measures
- Prepare regular reports and ensure accountability to stakeholders

A dedicated law on human rights due diligence should be enacted, phased according to industrial size and scope, and ensure the accountability of multinational enterprises operating in Bangladesh.

c) Establishment of HRDD Monitoring and Grievance Mechanisms

A permanent Labour Commission should be established to oversee HRDD and implement an effective grievance redress mechanism for human rights violations in business operations. This Commission should operate independently and effectively to ensure prevention and remediation of human rights violations alongside broader labour rights protection.

d) Establishing a permanent mechanism for priority-based analysis of human rights risks and impacts in large industries, including the export sector

1. An independent and comprehensive assessment system should be established to periodically analyse human rights risks and impacts across large and export-oriented industries. This will enable the identification of gaps between ideal standards and actual practices, as well as track progress in human rights protection. Therefore, a permanent mechanism must be established to conduct this process in a continuous and centralised manner.
2. A national-level centralised database should be maintained to record risk assessments, preventive measures, remediation efforts, and accountability information. This will reduce the need for multiple audits and enhance coordination among the government, brands, and buyers. Therefore, in order to reduce the need for multiple audits, it is essential to establish a permanent Human Rights Due Diligence mechanism for conducting a consistent, effective, and acceptable analysis of human rights risks and impacts.

e) Comprehensive Supply Chain Database for Worker Rights and Transparency

A detailed national database should be developed to map the structure, scope, and flow of all export-oriented and large industrial supply chains. This database will facilitate identification of factories, workers, suppliers, and other stakeholders, enabling effective planning and implementation of HRDD processes.

f) Mandatory HRDD Provisions in Trade Agreements

Trade agreements should include a mandatory social clause requiring compliance with HRDD standards. This will ensure that both local suppliers and international buyers are accountable for protecting human rights, including workers' rights, in Bangladesh's export-oriented industries.

g) Identification of the relevant ministries and agencies of the government and enhancement of awareness regarding business and human rights

Successful implementation of business and human rights initiatives requires multi-stakeholder cooperation. Strengthening coordination among relevant ministries—Labour and Employment, Commerce, Law, Justice and Parliamentary Affairs, Finance, Industries, and Environment, Forest and Climate Change—will create a coherent state framework to address human rights challenges. In addition, effective training and workshops should be conducted for employers, trade unions, civil society organisations, and other stakeholders to raise awareness and build capacity for responsible business conduct.

5.2 Climate Change and Just Transition

Bangladesh is highly vulnerable to both disasters and climate change. According to the Global Climate Risk Index 2021, it ranks as the seventh most disaster-prone country in the world.[28] Although Bangladesh contributes minimally to global carbon emissions, it is among the countries most severely affected by climate change. Globally, climate change has significant adverse effects on the workforce, impacting employment and productivity, with potentially more severe consequences in the future. Rising global temperatures are expected to reduce working hours overall. According to ILO estimates, heat-related reductions in working hours will result in a global loss of 3.8% of total labour hours by 2023, while for Bangladesh, this reduction is projected at 4.84%. Vulnerable groups—particularly women, migrant workers, youth, indigenous peoples, the poor, and persons with disabilities—are disproportionately affected. Workers in informal sectors and small enterprises are especially susceptible, as environmental shocks often impede recovery, making rehabilitation particularly challenging.[29]

Globally, the impacts of climate change and the adoption of carbon reduction policies have driven changes in industrial and trade practices. The International Labour Organisation (ILO, 2017) emphasises that green jobs must be decent and dignified, adhering to the four strategic objectives of the Decent Work Agenda. Just Transition refers to a process designed to ensure environmental protection while creating decent and dignified employment and safeguarding fundamental rights

[28] https://www.undp.org/bangladesh/publications/climate-vulnerability-index-draft

[29] International Labour Office. (2018). *The employment impact of climate change adaptation.* Input Document for the G20 Climate Sustainability Working Group International Labour Office (ILO): Geneva.

of the workforce. In this context, the Labour Reform Commission recommends the following measures:

a) Development of a National Climate Justice Strategy

A labour-sensitive National Climate Justice Strategy should be formulated to mitigate the adverse impacts of climate change on the workforce and their families, ensuring climate justice while promoting a transition to environmentally sustainable industries. The Strategy will support equitable climate compensation for workers and their dependents, focusing on:

- Promoting climate justice through employment creation
- Establishing social justice frameworks
- Poverty reduction

b) Development of a National Just Transition Strategy Framework

- Any transition to a green economy, technological transformation, or industrial upgrade must be inclusive and ensure equity and justice for all stakeholders. A National Just Transition Strategy Framework should be established to ensure fair, inclusive, rational, and protective transitions for both workers and industries. Active participation and clearly defined responsibilities for government, employers, trade unions, and other business and social stakeholders are essential.
- The framework should include sector-specific plans, guidelines, and directives.
- Procedural and administrative obstacles should be minimised to incentivise environmentally sustainable industrialisation or green factory transformation while ensuring compliance with social conditions, such as worker rights protection and welfare.

c) Establishment of a Just Transition Advisory Council

A **National Just Transition Advisory Council** should be formed to monitor key barriers to industrial greening, including inequalities and injustices, and ensure that transitions are equitable. Sector-specific monitoring units should be established to assess the implementation of just transition measures. The Council will be constituted through a democratic, tripartite process.

d) National Climate and Just Transition Fund

A fund should be established from government and international sources to address losses and damages from climate change and facilitate transitions to a green economy while ensuring social protection. The fund should cover:

- Creation of new employment opportunities
- Research and innovation
- Insurance and compensation for displacement due to climate change or transitions
- Unemployment benefits and allowances
- Rehabilitation and reskilling of affected workers
- Support for job placement and social protection for affected workers and their families

e) Enhancing the capacity to identify risks in the processes of climate change and transition

Occupational safety and health risks arising from climate change should be assessed, and plans developed to safeguard workers. The Factories and Establishment Inspection Department should be strengthened with the necessary equipment and training to conduct green factory inspections, identify emerging risks, and monitor occupational safety and health standards. Monitoring checklists must be upgraded in line with new technologies and industrial transformations.

f) Updating economic, social, and climate-related policies and enhancing accountability

- Economic, social, and climate-related policies should be revised in accordance with ILO Just Transition Guidelines. National carbon emission targets and long-term low-carbon development strategies must integrate just transition priorities.
- Policies must be cohesive and integrated with other economic and social policies, such as labour market policies, banking loan conditions, government incentives, and investment policies, to enhance accountability and mitigate adverse impacts.
- Investment and financing policies, including bank loans and import-export incentives, should require pre-assessment of potential social impacts on workers, along with mitigation measures aligned with just transition principles.

g) Rehabilitation, Skill Development, Up-Skilling, and Re-Skilling

- Workers affected by green transitions must receive rehabilitation, up-skilling, and re-skilling opportunities. Early notification and preparation for technological changes are essential. If job loss is unavoidable, affected workers should receive statutory compensation and support for re-employment.

- Comprehensive and accessible skill development programmes must be designed in advance, aligned with just transition processes.
- Workers must be informed about required future skills at the onset of automation or technological development and provided adequate opportunities and support to acquire them.

h) Gender-Responsive Just Transition Policies

Just transition policies must address the needs and challenges of female workers. Special attention should be given to their rehabilitation and skill development needs. Female representation must be ensured in social dialogue, collective bargaining, and industry decision-making. Transition processes must preserve a balance between women's work and personal life.

i) Responsibilities of International Brands and Buyer Companies

- International brands and buyers must actively support the adoption and implementation of inclusive just transition policies, prioritising human rights and environmental due diligence in mitigation and adaptation plans.
- Brands, major export destination countries, and other organisations promoting sustainable production should participate technically and financially in social protection initiatives during the transition period as part of responsible business conduct.

j) Green Transition Guidelines

- Any sectoral environmental improvement, green transition, or economic development initiative—including technological adaptation, digitalisation, automation, or robotics—must follow an inclusive transition framework. All policies and programmes must align with the Paris Agreement (2015) and place climate justice at the centre.
- Just transition policies must adhere to the four pillars of the Decent Work Agenda: employment creation, social protection, labour rights, and social dialogue.
- Worker representation, social dialogue, and trade union participation must be guaranteed in all transition processes.
- Transition initiatives must be pre-planned with job security at the centre, ensuring that no unemployment arises, and that workers and their families retain social protection during and after transitions.

- Certification of green factories must go beyond infrastructure and environmental design, including compliance with national and international labour standards, human rights, and the impact of greening on workers. Factory evaluation must consider human rights, labour conditions, and environmental compliance before being designated as “green.”

5.3 Measures on Social Conditionality in Trade, Investment, and Public Procurement

a. Development of Business Social Conditionality Policies:

In accordance with the ILO Core Conventions, alongside fundamental labour rights, it is necessary to formulate business social conditionality policies or standards that explicitly adhere to the Bangladesh Labour Act 2006, provisions on fair wages, internationally recognised human rights, and, in particular, principles of just transition in environmental protection. Compliance with these standards should be mandatory.

b. Incorporation of Social Conditionality in Public Procurement and Investment Policies:

All public projects, infrastructure development initiatives, and activities related to government procurement must incorporate a requirement for adherence to business social conditionality policies or standards. Only those companies that comply with labour laws, human rights, and environmental protection standards should be eligible to participate in government tenders or projects.

c. Integration of Social Conditionality in International Trade and Investment Agreements:

Foreign investment and trade agreements should include provisions for business social conditionality to ensure that workers’ rights are not violated. Multinational companies involved in such agreements must comply with international and regional human rights due diligence guidelines, country-specific mandatory regulations applicable to multinational enterprises, and, where relevant, laws governing transparent supply chains.

d. Linking Social Conditionality to Loan Conditions:

Banks and financial institutions may condition the provision of business loans on mandatory compliance with business social conditionality policies or standards. This approach ensures that businesses remain committed to human rights, labour rights, and environmental protection, while financial institutions uphold their social responsibilities.

e. Incorporation of Social Conditionality in Company Registration/Updating Processes:

By including social conditionality standards in the process of company registration or registration updates, businesses will be obliged to comply with provisions on workers’ rights, human rights, and sustainable environmental practices. Registration renewal may be made contingent upon an

assessment of compliance, thereby encouraging companies to continuously uphold these standards.

f. Application of Social Conditionality in Tax Incentives:

Alongside existing conditions in the government's tax incentive framework, social conditionality may be imposed, requiring industrial or business enterprises to comply with relevant social standards while conducting their operations. This approach promotes both economic growth and social development, which are prerequisites for sustainable development. Enterprises that fully comply with social conditionality standards may also be eligible for additional tax benefits.

g. Enforcement of Social Conditionality in Access to Government Incentives:

Requiring compliance with social conditionality as a condition for receiving government incentives can help ensure workers' welfare, environmental protection, and fair working conditions. Linking these standards to government incentives encourages businesses to act responsibly towards society and to improve production processes and technology.

h. Inclusion of Social Conditionality in Residential or Institutional Infrastructure Approvals:

For the construction of residential or institutional infrastructure, social conditionality may be incorporated into the approval process administered by local government authorities. By ensuring compliance with social standards in all types of construction, the rights and welfare of workers in the informal sector can be protected.

6. Reform Proposals for the Rights and Welfare of Special Labour Groups

6.1 Marginalised Labour Groups by Gender, Age, and Special Needs

6.1.1 Women Workers

Women face a wide range of barriers throughout life, particularly in the workplace, due to gender-based and social inequalities. Their access to skills development training, employment opportunities, and promotion is limited; women are paid less than men for the same work; maternity leave and protection remain inadequate; their representation in collective bargaining and decision-making is low; and women are frequently exposed to gender-based violence and harassment both inside and outside the workplace. The lack of women-friendly infrastructure, insufficient safety and welfare provisions, and the dual burden of domestic and professional responsibilities are persistent realities. These challenges marginalise women, leading to a higher participation rate in precarious and low-paid work.

In light of these realities, the Labour Reform Commission proposes measures aimed at eliminating discrimination, ensuring safe and dignified livelihoods, and securing full participation and empowerment of women workers as equal citizens in a fair and inclusive Bangladesh.

Representation and Decision-Making:

Gender-based violence, social stigma, safety concerns, and lack of support networks significantly hinder women's political participation and leadership roles in both public and private sectors.[30] For instance, while a large number of women are employed in export-oriented garment sectors, management is overwhelmingly male-dominated, and female representation at senior levels is minimal.[31] In government service, women constitute only 29.3% of officers.[32]

Although the Constitution guarantees gender equality, the absence of parity in leadership and decision-making prevents women from fully realising their rights. International frameworks, including SDG 5, the Beijing Declaration and Platform for Action (1995), and CEDAW, emphasise women's empowerment and gender equality. Equal representation of all population groups is essential in a democratic society.

Recommendations for Women's Representation and Decision-Making:

[30] Moyeen, Sabah et al. (2022).

[31] Macchiavello, Rocco, Menzel, Andreas, Rabbani, Atonu & Woodruf, Christopher. (2020). Challenges of Change: An Experiment Promoting Women to Managerial Roles in the Bangladeshi Garment Sector; Chaumtoli Huq (2019) "Women's Empowerment" in the Bangladesh Garment Industry through Labour Organizing.

[32] The Financial Express. (July 8, 2023). Number of women joining government jobs increasing gradually.

a) To ensure proportional representation of women in social dialogue, collective bargaining, and any labour representation decision-making processes, both within and outside the workplace.

b) To develop policies for ensuring proportional participation of women at all levels of public and private institutions, unions, and federations.

c) To give due consideration to the opinions and decisions of female leaders in collective bargaining, grievance resolutions, and policy-making processes.

d) To establish effective anti-harassment committees with female leadership within federations to prevent sexual harassment.

e) To implement capacity-building and awareness programmes to enhance female leadership and representation, including integrating gender-sensitive leadership training into the curriculum of government industrial relations institutes.

f) To facilitate effective participation of women in government schemes and incentives targeting the informal sector.

Women-Friendly Infrastructure, Safety, and Welfare:

The Bangladesh Labour Act 2006 (Sections 89–99) and Bangladesh Labour Rules 2015 provide various welfare measures applicable to women workers, including workplace daycare centres, designated breastfeeding rooms, separate toilets for men and women, institutional health services, and prenatal and postnatal care in establishments with over 5,000 workers.[33] However, implementation and monitoring remain weak.[34]

Currently, Bangladesh has 63 government-run community-based daycare centres, over 100 private centres, and a few NGO-run centres.[35] But most private centres are prohibitively expensive for lower- and middle-income families. Shortages of centres, trained caregivers, safety concerns, and prevailing negative social perceptions of childcare limit both uptake and effectiveness.[36]

Recommendations for Women-Friendly Infrastructure, Safety, and Welfare:

a) To ensure the provision of breastfeeding corners in all workplaces.

---

[33] Bangladesh Labour Act 2006 (Sections 89–99); Bangladesh Labour Rules 2015 (Rules 77, 78, 86, 94, 95).

[34] Akhter, S., Rutherford, S. & Chu, C. (2019).. Exploring the system capacity to meet occupational safety and health needs: the case of the ready-made garment industry in Bangladesh; Syed, R.F., Mahmud, K.T. & Karim, R. (2024) Do Labour Welfare Policies Matter for Workers? Evidence from the Garment Supply Chain Industry in Bangladesh.

[35] ILO (2024) Government of Bangladesh launch Roadmap for Childcare in Bangladesh.

[36] Taş, E. O., & Ahmed, T. (2024); Elsey, H. et al. (2020); Zhang, J. et al. (2020) What drives parents to consider center-based child care for their children? The case of Bangladesh; Rahman, Tashmina; Arnold, Tamara; Shams, Farzana & Rahman, Mokhlesur (2022) Raising the Quality of Child Caregiving in Bangladesh.

b) To establish affordable, subsidised canteens offering nutritious food and laundry facilities in dense work areas.

c) To provide effective, free or low-cost daycare centres and safe spaces for children and adolescents up to age 14 in work-dense areas, with awareness campaigns promoting their use.

d) To involve DIFE inspectors in implementing Ministry of Women and Children's daycare and early childhood education initiatives.

e) To ensure proportionate, hygienic toilets for women at workplaces, equipped with covered waste bins and separate washing areas.

f) To supply sanitary napkins and essential medicines for women workers.

g) To ensure female doctors and nurses provide reproductive health services in workplace health centres or hospitals.

h) To include women-friendly infrastructure, safety, and welfare in workplace Safety Committees, ensuring proportional female representation.

i) To obtain written consent for women's night shifts and to provide safe transport to and from work.

j) To construct government hostels for working women in district towns and residential colonies for low-income women in Dhaka and Chattogram.

k) To adopt medium- and long-term women-friendly urban planning measures ensuring safe mobility and meeting the diverse needs of working women, including gender-sensitive transport, adequately lit stops, and monitoring mechanisms.

Work-Life Balance:

In both institutional and informal sectors, including factories and industries, women are engaged in income-generating activities while society simultaneously imposes household responsibilities upon them. In the social context of Bangladesh, the duties of household chores, child rearing, and caring for the elderly and the sick are primarily assigned to women. This not only hampers their professional skills and productivity but also places a double burden upon them. As a result, it becomes difficult for women to participate as citizens or skilled workers, and to take part in decision-making and leadership roles.[37]

[37] According to the **Time Use Survey 2021**, a marked disparity exists between women and men in Bangladesh in relation to unpaid care and domestic work. Women spend **5.9 hours** per day on caregiving and household tasks, whereas men spend only **0.8 hours**. In other words, women spend **approximately 7.3 times more** time on such work than men. By contrast, men spend **6.1 hours** on paid work per day, while women spend only **1.2 hours**. Thus, men's participation in paid work is **five times higher** than that of women.
BBS & UN Women Bangladesh (2022), *Time Use Survey 2021*.

Recommendations for Work-Life Balance:

a) To implement an eight-hour workday without interruption, with reasonable weekly and public holidays, across all sectors, raising awareness and strengthening monitoring through DIFE, and to consider flexible working hours for six months after maternity leave.

b) To provide institutional and community-based daycare, subsidised healthy canteens, and laundry services in dense work areas.

c) To establish community-based evening healthcare facilities.

d) To support the creation of government schools, recreational spaces, and cultural education centres in worker-dense areas.

e) To amend labour law in accordance with ILO Convention 156 (Workers with Family Responsibilities Convention, 1981).

Skills Development for Women Workers:

Women face multiple barriers to employment, including limited participation in higher education and vocational or technical training, which constrains skill development. Risks from automation, the Fourth Industrial Revolution, and climate change further threaten women's employment. Lack of accessible training information and job notifications compounds the challenge, limiting women's participation in high-skill employment.

Recommendations for Skills Development:

a) To include all technical education institutions and public-private training information in a centralised database, with effective campaigns to raise awareness among women workers.

b) To integrate modern equipment, technical skills, communication, confidence-building, leadership, and management into training curricula.

c) To promote women's participation in alternative employment sectors, such as care work, the gig economy, platform-based services, and freelancing.

d) To establish technical education and training centres in urban and rural areas with safe, gender-segregated hostels.

e) To provide training for overseas employment in sectors such as caregiving and nursing, and to increase women's participation in traditionally male-dominated skills sectors (technology, engineering, driving, management).

f) To develop partnerships between training centres and public-private employers to provide direct employment opportunities, including organising job fairs and campaigns to integrate women into underrepresented sectors.

g) To encourage participation in STEM (Science, Technology, Engineering, Mathematics) through gender-sensitive national programmes, scholarships, professional training, mentorship, and showcasing successful female role models.

h) To expedite ongoing national job portal activities and to promote their use among women, with continuous monitoring and evaluation.

6.1.2 Third Gender / Hijra Community

The Hijra community in Bangladesh is a distinct social group recognised as the "third gender" by the government on 22 January 2014, granting rights such as voting, access to healthcare, and participation in government employment.[38] However, implementation remains limited.

Recommendations:

a) To create a database and provide identity cards prior to employment initiatives for the third gender.

b) To promote inclusion in mainstream employment and improve quality of life through skills development and vocational training, ensuring participation and input from the community in planning and implementation.

c) To expand coverage under government social protection schemes.

d) To establish government and private shelters and rehabilitation centres offering food, clothing, education, healthcare, and recreational facilities.

6.1.3 Youth Labour Population

Youth are a vital resource and the main driver of national development. Current youth unemployment, especially among the educated, is high (47%), largely due to insufficient job creation. Annually, approximately 2 million people enter the labour force, but new employment opportunities remain limited.

Poor quality education, misalignment with labour market demand, lack of technical skills, and insufficient vocational training prevent the youth from realising their potential as skilled human capital, depriving the country of the demographic dividend.

Recommendations:

a) To standardise the definition of youth across government records, surveys, and policies.

[38] The Programme to Improve the Life-style of Hijra Community, The Directorate of Social Services, The Peoples' Republic of Bangladesh. https://dss.gov.bd/site/page/e3108b96-8e64-4fb4-be8e- / হিজড়া-জনগোষ্ঠীর-উন্নয়ন

b) To launch targeted apprenticeship and skills development programmes for NEET youth (Not in Education, Employment, or Training), aligned with industry needs to facilitate formal employment in high-growth sectors.

c) To promote participation in STEM through national programmes, scholarships, professional training, and apprenticeships, and to create employment opportunities in partnership with industry.

d) To undertake various initiatives at educational institutions and at the national level with a view to raising awareness among the younger generation about the importance and dignity of work; including incorporating work ethics principles into the curriculum, arranging guest lectures by professionals from different income groups, encouraging parents to share their work-life experiences with children, and providing students with opportunities to gain practical work experience alongside professionals; and to engage youth in constructive activities by expanding sports and cultural programmes.

e) To implement demand-driven, targeted apprenticeship and skills development programmes to equip youth for formal employment in high-growth sectors.

6.1.4 Elderly Labour Force

According to the Population and Housing Census 2022, the approximate number of the elderly people[39] in Bangladesh is 1 crore 53 lac and 27 thousand,[40] of whom 36.56 per cent remain engaged in some form of income-earning activity.[41] Large numbers of elderly citizens are involved in informal work such as agriculture, daily wage labour and rickshaw pulling. Despite age-related physical limitations and frailty, they are compelled by necessity to continue working in order to sustain their livelihood. For the vast majority of the elderly population, there is little or no social protection.

The Commission is of the view that the State must ensure food, clothing, shelter, recreation and healthcare for this segment of the population. In this regard, the Commission's recommendations are as follows:

---

[39] The *National Policy on Older Persons 2013* recognises individuals aged **60 years or above** as elderly.

[40] Bangladesh Bureau of Statistics, *Preliminary Report on the Population and Housing Census 2022*, Statistics and Informatics Division, Ministry of Planning, Dhaka: 2022.
https://sid.portal.gov.bd/sites/default/files/files/sid.portal.gov.bd/publications/01ad1ffe_cfef_4811_af97_594b6c64d7c3/PHC_Preliminary_Report_(English)_August_2022.pdf

[41] Bangladesh Bureau of Statistics, *Labour Force Survey 2022*, Statistics and Informatics Division, Ministry of Planning, Dhaka: 2023.

a) Retirement age must be determined for individuals engaged in informal, temporary and self-employment, and they must be brought under retirement allowances or social security schemes. In determining retirement age, the *National Policy on Older Persons 2013* may be considered, which recognises all persons aged 60 years or above as elderly.

b) Poor elderly persons who are not engaged in work should be brought under the Old Age Allowance scheme, and the allowance amount should be increased to a reasonable level in view of their daily needs (food, clothing, healthcare and other essentials). At present, the minimum age for eligibility is 65 for men and 62 for women. Since the national policy recognises persons aged 60 and above as elderly, the minimum age for eligibility should be revised to 60 years.

c) Pre-retirement training on psychological, social and economic management is required to ensure meaningful social engagement of the elderly and productive utilisation of their experience and skills after retirement. Considering their health capacity and age, elderly individuals should be engaged in suitable activities within their local communities, or supported to undertake initiatives through which their accumulated experience and skills can be shared and transferred to younger generations. Activities of voluntary and development organisations in this regard should be encouraged and strengthened. Interested elderly individuals may be provided with interest-free or low-interest loans on easy terms for self-employment.

d) Health insurance for the elderly should be introduced, or free priority healthcare services should be provided through government hospitals and health centres. To ensure prompt and priority treatment, separate counters and wards should be established in government and private hospitals, clinics and medical centres. A Health Service Card should also be introduced for elderly persons.

6.1.5 Indigenous Peoples / Ethnic Minorities

Indigenous peoples and various ethnic communities are generally recognised as marginalised groups and remain largely excluded from the benefits of national development.[42] Although certain state policy frameworks reflect their rights, initiatives to operationalise these commitments remain limited. Notably, Bangladesh has yet to ratify ILO Convention No.169 concerning Indigenous and Tribal Peoples.

In terms of skills development and participation in economic activities, these communities lag behind the general population. Although about 75 per cent are engaged in some form of economic activity, their participation is concentrated in the informal sector (89.84 per cent)[43], where wages are low and no social protection exists. Only 2.64 per cent of the working-age population from

[42] Kazi Ali Toufique et al., Baseline Assessment of Skills and Employment of Indigenous and Tribal Peoples in Bangladesh, BIDS and ILO, Dhaka: 2017.Retrieved from: https://www.ilo.org/publications/baseline-assessment-skills-and-employment-indigenous-and-tribal-peoples

[43] Ibid, p. 108

these communities has received vocational training (2.79 per cent men and 2.5 per cent women)[44]. As a result, indigenous and ethnic minority workers are forced to accept low-paid and unskilled work.

The Commission's proposals for improving living standards and ensuring fair rights for indigenous and ethnic minority workers are as follows:

a) The Government should ratify ILO Convention No.169 and finalise the Anti-Discrimination Act under consideration at the Ministry of Law, ensuring its effective implementation.

b) Clear provisions must be incorporated in labour laws and regulations to ensure that workers from indigenous and ethnic minority communities, like all other communities, may enjoy leave during major cultural and religious festivals.

c) Measures must be taken to prevent the grabbing of lands traditionally owned or used by these communities, thereby safeguarding their livelihoods. Government initiatives are required to provide appropriate professional and vocational training to create suitable employment opportunities for them. In particular, considering local demand, providing relevant training to youth from small indigenous communities for employment in the tourism sector would yield positive results.

d) At present, a 1 per cent quota exists for indigenous and ethnic minority groups in government employment. Considering their status as disadvantaged communities, quotas should be rationalised and preserved for them across both public and private sector employment.

e) To preserve traditional cottage industries sustained through ancestral knowledge, government-supported technical training must be arranged. Projects for training in indigenous cottage industries may be undertaken through the Offices of Women Affairs. Additionally, incentives for entrepreneurship, interest-free loans and, where necessary, separate banking guidelines should be introduced.

f) To ensure fair prices for locally produced goods such as agricultural products and cottage industry items, market monitoring must be strengthened. Measures should be taken to prevent control by middlemen and syndicates.

6.1.6 Workers with Disabilities

In Bangladesh, 2.80 per cent of the total population is persons with disabilities—3.28 per cent among men and 2.32 per cent among women.[45] This population faces exclusion from education, employment, healthcare and disability-related essential services. Their economic inclusion remains limited due to social attitudes, lack of practical experience and skills, discrimination, and unsuitable work environments. Persons with disabilities often face discriminatory behaviour,

[44] Ibid, p. 116

[45] Bangladesh Bureau of Statistics, *National Survey on Persons with Disabilities (NSPD) Report 2021*, Statistics and Informatics Division, Ministry of Planning, Government of the People's Republic of Bangladesh, 2022.

harassment and social ridicule at workplaces, hindering their professional and mental well-being. Additionally, inadequate accessibility in workplaces and transport restricts their participation. Training opportunities are scarce; only 2.66 per cent of persons with disabilities have received any form of training, mostly in computers, ready-made garments, handicrafts and cottage industries.

The UN Convention on the Rights of Persons with Disabilities (UNCRPD), which Bangladesh has ratified, recognises disability as a natural part of human diversity and calls for inclusion in all spheres. However, the Bangladesh Labour Act 2006 contains no provisions regarding employment and protection of persons with disabilities, resulting in their exclusion from minimum legal safeguards.
In this context, the Commission's recommendations are as follows:

a) The definition of a worker with disabilities must be incorporated into the Labour Act, and a separate chapter must be added outlining the rights, benefits and protections of workers with disabilities, including special provisions for women with disabilities. This should be aligned with the *Rights and Protection of Persons with Disabilities Act 2013*. Provisions must ensure non-discrimination in recruitment and employment, reasonable accommodation, appropriate facilities based on disability type (including gender-specific needs), equal opportunities, and access to skills training.

b) A gender-disaggregated database of persons with disabilities should be created in accordance with the 2013 Act. This database should guide the provision of technical and vocational training and employment opportunities, taking into account gender and type of disability. Training facilities must be expanded to rural areas. Skills-development training must be aligned with global demand, and training institutes must be made disability-friendly.

c) Quotas must be reserved for persons with disabilities in all public and private institutions to ensure employment opportunities.

d) To encourage entrepreneurship among persons with disabilities, capital support must be ensured alongside training. Bangladesh Bank may introduce special programmes offering interest-free or low-interest loans. NGOs should also be encouraged to undertake such initiatives.

e) Workplaces and all forms of public transportation—including metro rail, buses, trains, launches and steamers—must be made disability-friendly. To ensure accessibility, construction of workplaces and buildings must comply with the *Building Construction Act, 1952* and related rules, including the provision of ramps and lifts. In public transport, the statutory requirement of reserving **5 per cent** of seats for persons with disabilities must be effectively enforced.

f) To promote employment of persons with disabilities, the existing provision of a **5 per cent tax rebate** for institutions employing 10 per cent of their workforce from persons with disabilities should be fully enforced, and awareness campaigns on this provision should be strengthened.

6.1.7 Migrant Workers

Currently, approximately 12 million Bangladeshis are employed in various countries around the world. Given the significant contribution of migrant workers to Bangladesh's economy, the Government has introduced a range of laws, regulations, and policies to ensure effective migration management and to protect workers' rights, welfare, and safety. However, various weaknesses persist in the implementation and enforcement of these instruments. For instance, despite regulatory guidance on overseeing private recruiting agencies, high recruitment costs and exploitative practices remain unchecked. Additional challenges include enhancing and recognising workers' skills, ensuring health, safety, and social protection, expanding overseas labour markets, reintegrating returnee workers, and incorporating migrant workers into trade unions.

Recruitment Processes for Overseas Employment

The recruitment process for Bangladeshi migrant workers remains opaque and exploitative. Workers often lack accurate information on which countries and sectors offer legal employment opportunities, the actual cost of migration, and the terms and conditions of employment—such as work hours, wages, overtime, leave entitlements, medical expenses, accommodation, and pre-departure orientation. Information on where to obtain training and certification, how to open bank accounts, or how to apply for bank loans is similarly inaccessible.

Due to limited occupational skills, inadequate understanding of the laws, customs, and social norms of destination countries, and general informational constraints, workers frequently rely on local sub-agents or intermediaries. These intermediaries manage the entire migration process—from obtaining passports to arranging travel to the destination country—often in exchange for substantial sums of money. Consequently, the migration cost for Bangladeshis is inflated to three to four times higher than that of neighbouring countries. Beyond excessive financial burdens, lack of accurate information results in workers being deprived of decent jobs, fair wages, and basic benefits at the workplace.

Recommendations of the Labour Reform Commission Regarding Recruitment

The Commission recommends:

a) **To ensure implementation of** the *Recruiting Agent Licence and Code of Conduct Rules 2025* and the *Recruiting Agent Classification Rules 2020*, so that fair competition and accountability among agencies may be strengthened. The annual publication of recruitment agency classifications on the Ministry's website would help prospective migrants access accurate information.

b) **To allow** recruitment agencies that can demonstrate documented long-term direct relationships with overseas employers and have no complaints lodged against them in the past five years to complete all migration procedures under an expedited "express" system.

c) **To provide** special services for migrant workers in medical examinations, passport processing, air-ticketing (including special labour fares), and airport services. The introduction of reduced-price air tickets from Biman Bangladesh Airlines, subject to valid visas and BMET clearances, would further support workers.

d) **To publish** a transparent and government-approved list of migration-related costs on a quarterly basis and to strengthen monitoring mechanisms.

e) **To introduce** a digital complaint system enabling complainants to track the status of their cases.

f) **To curb** visa trading and illegal recruitment activities through appropriate legal measures, and **to bring** intermediaries and sub-agents under accountable frameworks. Rational reductions in BMET registration fees, agency security deposits, and corridor-specific deposits would help reduce workers' financial burdens.

g) **To facilitate** legitimate remittance transfers for agency marketing and promotional activities in potential destination countries, as per Government-approved channels, in order to encourage regular recruitment competition and minimise illegal financial flows.

h) **To promote** the signing of bilateral agreements—rather than memoranda of understanding—on labour migration, and **to ensure** that agreement contents are determined in consultation with relevant stakeholders and recruitment agencies, followed by public disclosure on official websites.

i) **To improve** access to all information related to migration procedures and visas, and **to present** essential information (e.g., job types, Government-approved migration costs, legal migration pathways) in user-friendly formats on the websites of the Ministry, BMET, BOESL, and BAIRA.

j) **To ensure** full implementation of the *Overseas Employment and Migrants Act 2013* and its 2023 amendments, the *Overseas Employment and Migrants Ordinance 2024*, the *Wage Earners' Welfare Board Act 2018*, and the *Overseas Employment and Migration Management Rules 2017*, along with enforcement of the UN Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990).

k) **To progress towards** complete implementation of the UN Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990).

l) **To upgrade** existing worker databases by regularly incorporating information on skills and certifications, enabling recruitment agencies to select workers directly through an effective central database.

m) **To undertake** ratification of relevant ILO international conventions related to labour migration.

Skill Development and Recognition of Migrant Workers

A significant mismatch persists between the skills of Bangladeshi workers and the requirements of international labour markets. Training acquired in Bangladesh is often not recognised in destination countries, resulting in migrant workers being classified as unskilled. Lack of foreign language proficiency further exacerbates workplace challenges and discrimination.

Although the Government has established 110 Technical Training Centres (TTCs) under BMET to build worker skills, the number of trainees securing overseas employment remains low, and public confidence in the quality of training is limited. Skills gaps and language barriers restrict Bangladeshi workers from accessing better-paid jobs and improved working conditions. Many are employed in roles below their qualifications or skill levels, impacting income, safety, and job security, and forcing some into hazardous occupations. On return, difficulties in utilising acquired skills contribute to unemployment and reduced per capita income. Lack of pre-departure training also exposes workers to challenges during travel, in airports, and in destination countries.

Recommendations of the Labour Reform Commission on Skill Development and Recognition

The Commission proposes:

a) **To evaluate** the performance, skills capacity, and overall effectiveness of BMET's Institutes of Marine Technology (IMTs) and Technical Training Centres (TTCs).

b) **To make** job placement mandatory for IMTs and TTCs, **to publish** regular placement reports, and **to allocate** Government budgets accordingly. Engagement with private-sector employers for apprenticeship opportunities would help generate local employment options.

c) **To develop** internationally relevant training programmes, including language and cultural orientation, in line with global labour market demands, and **to ensure** regular quality assessments.

d) **To introduce** Recognition of Prior Learning (RPL), upskilling, and reskilling programmes in IMTs and TTCs, along with mechanisms for job placement following completion.

e) **To support** BMET in developing competency standards (CS) and competency-based learning materials (CBLM) for different trades according to labour-market demand, to be submitted to the National Skills Development Authority (NSDA), and **to strengthen** trainer development.

f) **To ensure** recruitment of qualified trainers for IMTs and TTCs, accompanied by regular training, performance evaluation, and certification for trainees upon completion.

Limitations of Service-Providing Institutions

Several institutions—including the Ministry of Expatriates' Welfare and Overseas Employment, BMET, BOESL, District Employment and Manpower Offices (DEMOs), private recruiting agencies (BAIRA), the Wage Earners' Welfare Board, the Probashi Kallyan Bank, and Bangladeshi embassies and consulates abroad—serve migrant workers. However, many face budgetary constraints, infrastructural weaknesses, staff shortages, and institutional fragmentation. Coordination gaps and overlaps in functions undermine service delivery.

While embassies and labour wings are the primary support points for migrant workers abroad, many workers remain dissatisfied with the assistance they receive. The Wage Earners' Welfare Board provides support for repatriation of ill workers, medical treatment, and repatriation and burial of deceased workers, but concerns exist regarding the transparency of its operational expenditures and proportional disbursement for welfare activities. Organisational representation from migrant workers, labour unions, and civil society groups remains limited.

Owing to inadequate outreach and communication, many migrant workers are unaware of available services.

Recommendations on Strengthening Service-Providing Institutions

The Commission recommends:

a) **To revise and harmonise** the Allocation of Business of the Ministry and all related agencies to clearly delineate responsibilities and prevent duplication. Consideration may also be given to transferring Welfare Board staff positions to the revenue budget.

b) **To ensure** mandatory pre-departure training for all migrant workers through the Allocation of Business framework.

c) **To simplify** documentation and processing requirements for migrant worker loans, especially for returnee migrants, and **to expand** the operations of Probashi Kallyan Bank with easy terms and low interest rates. Incorporation of Key Performance Indicators (KPIs) would enhance service accountability.

d) **To require** labour attachés to convene Joint Committee meetings in destination countries in line with existing bilateral agreements or MoUs on overseas employment. Where such agreements do not exist, attachés may initiate efforts to establish them. Compliance with these requirements may be used as annual performance indicators.

e) **To publish** annual reports from labour welfare wings of embassies and **to ensure** that returning labour attachés serve a minimum of three years in the domestic overseas employment sector.

f) **To ensure** that labour attachés regularly analyse international labour markets and supply updated information on potential job opportunities and skill needs to the Ministry.

g) **To provide** adequate staffing and budget allocations for embassies and consular offices (including labour wings) and **to prioritise** the appointment of qualified professionals with experience in labour migration. Contract-based recruitment may be considered where appropriate.

h) **To enhance** coordination among BMET, DEMOs, TTCs, and the Wage Earners' Welfare Board to expand service delivery and improve accessibility.

i) **To consider** co-locating district-level DEMOs, TTCs, and welfare offices to ensure integrated service delivery for migrant workers and their families.

j) **To ensure** direct monitoring of migrant workers' workplace conditions and challenges, followed by provision of relevant guidance and services.

k) **To require** labour welfare wings of foreign missions to play an enhanced role in the repatriation of deceased workers and in securing compensation from employers.

Health, Safety, and Social Protection of Migrant Workers

Most migrant workers are employed in hazardous environments without access to proper safety equipment. Many face workplace discrimination, longer working hours, lower wages, inadequate medical benefits, and limited sick leave. Lack of health insurance further limits access to medical care. Migrant workers also experience mental health challenges, including isolation and family separation, yet mental-health support services are typically absent. No dedicated social protection programme exists for returnee workers suffering from physical or mental illness.

The Commission suggests:

a) **To conduct** regular assessments of the mandatory insurance scheme for outgoing migrant workers (established by Government circular in 2019), in order to determine the need for expanded coverage, enhanced benefits, or increased numbers of beneficiaries.

b) **To revise** the governance structure of the Wage Earners' Welfare Board on a tripartite basis, ensuring neutral representation of migrant workers.

c) **To consider** providing insurance benefits of Tk 1 million to families of migrant workers who die abroad due to suicide, AIDS/STDs, or other causes.

d) **To include** returnee migrant reintegration programmes as a regular mandate of the Board's Allocation of Business, with adequate budgetary allocations.

e) **To adopt** new welfare programmes and protection schemes based on research evidence and international best practices.

f) **To initiate** efforts to establish bilateral social security agreements with destination countries.

g) **To include** gender-sensitivity training for officers and staff of the Wage Earners' Welfare Board and **to integrate** gender-sensitive guidelines into KPIs.

Migrant Women Workers: Forms of Vulnerability

Every year a significant number of Bangladeshi women migrate overseas for employment alongside male workers. During migration, at the destination country, or in their workplaces, many women experience various forms of exploitation, abuse, and harassment. Even trafficking incidents occur more frequently among women than among men. The majority of Bangladeshi women migrant workers travel to Middle Eastern countries as domestic workers, where they typically have no fixed working hours or leave. Withholding of passports and mobile phones, restriction of communication with families, non-payment or under-payment of wages, sexual abuse, and mental and physical violence are common experiences. Although equal pay is stipulated for equal work, women are often paid less than men. After returning to Bangladesh, many women encounter familial and social stigma, discrimination, and marginalisation.

Recommendations for Addressing the Hardships of Migrant Women Workers

The Labour Reform Commission proposes measures that would include:

a) Ensuring that 24/7 helpline services operate effectively in both sending and destination countries for women migrant workers.
b) Making the welfare of women migrant workers a mandatory component of the duties assigned to labour attachés.
c) Ensuring the proper implementation of the provisions within the Wage Earners' Welfare Board Act, 2018 that relate to legal assistance, medical support, the establishment of safe homes in Bangladesh and abroad, and social and economic reintegration programmes for returnee women workers.
d) Enabling labour attachés, recruiting agencies, government and non-government organisations, and trade unions to take an active role in ensuring workplace protection for women migrant workers—particularly migrant domestic workers—including through special service days organised by embassies.
e) Conducting research and diplomatic engagement to broaden women's access to overseas occupations beyond domestic work.
f) Introducing necessary amendments to existing migration laws, rules, and policies—or adopting separate legal and policy frameworks for migrant and returnee women—to ensure their maximum protection, dignity, and welfare.
g) Providing training for new occupations in addition to domestic work and garments work, with a view to deploying women as skilled workers.

h) Designing special welfare programmes for returnee women workers, including social protection measures for destitute returnees.
i) Assessing women's Technical Training Centres (TTCs) under BMET and expanding training opportunities in non-traditional trades.
j) Ensuring that gender sensitivity becomes a key performance indicator (KPI) across all institutions serving migrant workers, including the Ministry of Expatriates' Welfare and Overseas Employment, BMET, BOESL, DEMO offices, BAIRA, the Wage Earners' Welfare Board, the Probashi Kallyan Bank, and Bangladesh's embassies and consular offices in destination countries.

Challenges in Overseas Labour Markets

Hundreds of thousands of Bangladeshi workers migrate abroad every year, with the majority being low-skilled or unskilled. Approximately 80 per cent travel to Middle Eastern countries, while the remaining 20 per cent go to South Asian and some European countries. Domestic workers in the Middle East are not covered under national labour laws. The Ministry does not undertake action-oriented studies on overseas labour markets. Labour attachés are expected to monitor markets and identify promising trades or skills, but this rarely occurs, partly due to inadequate budget allocations. Over the past decades, Bangladesh has not significantly diversified its presence in global labour markets.

The Commission proposes steps that would involve:

a) Dismantling the recruitment-agency "syndicate" and ensuring proper enforcement of legislation in consultation with all stakeholders.
b) Allocating budget for international labour market research and adopting action plans based on such research, with regular monitoring and progress review.
c) Initiating diplomatic negotiations directly by the Ministry to expand potential labour markets and inviting prospective employers from destination countries when required.
d) Upholding migrant workers' rights by implementing decisions taken in regional forums of sending and receiving countries (e.g., the Colombo Process, Abu Dhabi Dialogue).
e) Concluding binding bilateral agreements—rather than relying solely on memoranda of understanding—with labour-receiving countries and ensuring their full implementation.
f) Strengthening the proactive role of labour attachés and embassies in maintaining Bangladesh's labour-market share abroad.

Remittance Management

Remittances constitute a major share of Bangladesh's GDP and play a vital role in strengthening foreign exchange reserves. Remittances are generally sent through banks, money transfer services,

or mobile financial services—considered formal channels. However, high transfer fees, procedural complexity, and delays encourage many migrants to remit through hundi, an informal and illegal system. Many workers believe that bank-based transfers involve higher charges and slower processing. Despite the high annual inflow, there is no coherent national strategy to channel remittances into productive investment.

Policy measures recommended by the Commission would include:

a) Simplifying and accelerating digital and banking processes for remittance transfers and reducing transaction fees.
b) Introducing low-cost, reliable, and secure digital systems to encourage remittances through formal channels; expanding incentive schemes; raising awareness about the risks associated with hundi; and restricting illegal transactions through stringent enforcement.
c) Formulating policies and strategies to convert annual remittance inflows into productive investments.

Reintegration of Returnee Migrant Workers

Migrant workers return home after the expiry of employment contracts or due to unforeseen circumstances. Long periods abroad often result in emotional, social, economic, and cultural detachment. Women returnees in particular face distrust and social rejection. Returning migrants may struggle to access employment in trades, and many lack capital to initiate businesses. They require psychological, social, and financial support, while their acquired skills frequently remain underutilised. Many destitute or ill returnees suffer due to the absence of social protection schemes.

The Commission's proposals would involve:

a) Ensuring respectful treatment and specialised services at airports to minimise harassment.
b) Implementing a rapid reintegration policy that includes special micro-credit schemes, mental-health services, monthly social protection benefits for destitute or ill workers, and dedicated programmes for women returnees.
c) Providing opportunities for "up-skilling," "re-skilling," and "Recognition of Prior Learning (RPL)" to enhance employability and economic reintegration.
d) Prohibiting the use of Wage Earners' Welfare Board (WEWB) funds for salaries and allowances of government cadre officers, and ensuring that the Board routinely collects gender-disaggregated data and adopts specialised welfare programmes for women returnees.

Inclusion of Migrant Workers in Trade Unions

Migrant workers often face workplace discrimination and abuse. Women domestic workers are particularly vulnerable. In most destination countries, migrant workers are either not permitted to

form unions or face severe restrictions. The absence of bilateral and tripartite agreements further undermines labour rights, occupational safety, and access to social protection.

The Commission recommends measures that would include:

a) Ensuring representation of migrant workers in the Probashi Kallyan Bank and the Wage Earners' Welfare Board.
b) Concluding bilateral agreements between sending and receiving countries to safeguard migrant workers' rights.
c) Recognising both prospective and returnee migrant workers as "workers" under the Bangladesh Labour Act, 2006 and related laws, thereby granting them the right to unionise.

2) Mainstreaming Migrant Workers

Approximately 12 million Bangladeshi migrants spend long periods abroad. They cannot participate in national or local elections and therefore remain unable to select their political representatives. Despite their critical contribution to the economy, they lack opportunities to express political preferences. As a result, this large population remains excluded from socio-economic and political discourse, and their perspectives do not inform national development.

The Commission proposes actions that would involve:

a) Developing and operationalising appropriate policies to ensure voting rights for migrant workers.
b) Enabling migrants to cast votes online at their nearest embassy or consular office in the destination country.

6.1.8 Sanitation Workers / Waste Management Workers / Dalit Communities

Sanitation workers represent one of the most marginalised and socially excluded groups in Bangladesh. The Dalit and Harijan population is estimated at around 5.6 million[46], with a large proportion working as sanitation workers in city corporations and municipalities. Many are employed on a daily-wage, outsourced basis and face wage discrimination. They work in hazardous environments—cleaning manholes, toilets, and sewerage systems—without proper protective gear, resulting in severe health risks, including high incidences of cancer and asthma.[47]

[46] Life-Standard Improvement Program for the Marginalised Groups, https://msw.gov.bd/site/page/22f31a43-bdab-4613-9fa2- বেদে,-দলিত,-হরিজন - সমাজকল্যাণ মন্ত্রণালয়-গণপ্রজাতন্ত্রী বাংলাদেশ সরকার

[47] A research report shows that in the capital city Dhaka, 20 percent of sanitation workers die from cancer, and 23 percent die from asthma. Ashhabur Rahman Shoaib, *The Inhumane Life of Sanitation Workers*, *Dainik Purbokone*, 13 February 2020. https://dainikpurbokone.net/anniversary-supplement/107077/দৈনিক পূর্বকোণ

Generations of Dalit communities have endured structural discrimination and deprivation. The Commission emphasises the urgent need to change these conditions.

Recommendations for Sanitation Workers' Welfare

a) Phasing out outsourcing and introducing permanent employment for sanitation workers, along with regularisation of long-term contract workers.
b) Developing a structured wage system with periodic skill-based promotions and payment of festival bonuses in accordance with labour law.
c) Including sanitation workers in priority social protection schemes (e.g., pensions, provident funds) and ensuring access to healthcare and education for workers and their families.
d) Providing modern cleaning equipment and tools free of cost, along with training, to reduce occupational health risks.
e) Conducting periodic medical camps to identify health risks and ensuring necessary treatment and vaccinations; introducing health cards and hazard allowances; and ensuring compensation for workplace injury or death.
f) Establishing dedicated residential areas to ensure decent housing for sanitation workers and their families.
g) Ensuring safe sanitation and healthy living conditions for industrial sanitation workers through factory-based WASH committees and the adoption of specific WASH policies and checklists.
h) Creating work routines and environments that support safe and balanced family life for women sanitation workers, along with tailored health-protection policies.
i) Introducing reservation policies, if necessary, to eliminate discrimination against Dalit/Harijan communities and making discriminatory behaviour—based on occupational identity—a punishable offence, thereby facilitating their socio-economic mobility.

6.1.9 Workers Affected by Climate Change and Natural Disasters

Bangladesh is highly vulnerable to cyclones, storm surges, floods, droughts, and river erosion. In 2019 alone, 24.9 million people were displaced due to climate-related disasters. Most disaster-affected populations are engaged in agriculture and fisheries.[48] After disasters, agricultural workers often shift to non-agricultural occupations, where they earn lower wages due to lack of skills.[49] Loss of livelihood and forced migration push many families into debt, often at high interest from moneylenders or cooperatives. Declining income compels some families to send children to work, increasing child labour. Environmental hazards also heighten health risks, yet many workers cannot afford treatment.

[48] R. Islam, "Livelihood of Coastal Community in Bangladesh: Options, Changes and Alternatives," In R. Ahmed, A. Al-Maruf, & J. C. Jenkins (Eds.), Transforming Bangladesh: Geography, People, Economy and Environment (pp. 139-145), (2023) Switzerland: Springer Nature.
[49] T. Aziz, "Where the Fishing Community Heading to? Disaster-Led Occupational Transformation of the Fishing Communities in Coastal Bangladesh," i-manager's Journal on Humanities & Social Sciences, 3(2) (2023), P. 60-68.

Recommendations for Support to Climate-Affected Workers

a) Formulating special policies and establishing dedicated funds or emergency financing mechanisms to provide financial support for workers affected by climate change.
b) Establishing grievance-redress mechanisms for climate-affected workers and providing re-training for employment in emerging green-economy sectors.
c) Providing incentives to environment-friendly industries and encouraging workers to acquire environmentally sustainable skills through targeted support.

6.2 Agriculture-Based Labour Groups

6.2.1 Agricultural Workers

The agriculture sector contributes significantly to Bangladesh's overall economic development, accounting for about 14 per cent of the Gross Domestic Product (GDP). It is also one of the largest sources of employment in the country. Most agricultural workers are engaged through verbal agreements and work without any appointment letter.[50]

Although the Bangladesh Labour Act 2006 contains a definition of agricultural workers, it does not specify recognition of their work or clarify their rights.[51] Workers employed in government farms under the Ministry of Agriculture receive benefits according to the 2017 policy, but non-farm agricultural workers face job insecurity and have no economic or social protection during disasters or crises.[52]

There exists a wage gap between male and female workers in this sector. Women often work for the same duration or, in many cases, for longer hours and in more complex tasks compared to men, yet they face discrimination in both dignity and wages.[53]

According to the principles of Decent Work, there should be adequate safety provisions for agricultural workers; however, these are absent. Existing guidelines apply only to government and private farms and do not extend to non-farm workers. Excessive use of chemical fertilisers and pesticides also exposes agricultural workers to health risks due to lack of protective equipment.

In relation to agricultural workers, the Commission proposes the following:

---

[50] Hossain & M. Ahmed, "Economic and Social Upgrading of Smallholders in Rice Value Chains of Bangladesh: A Case Study," An unpublished Research Report, International Centre for Development and Decent Work, Germany (2018).

[51] Bangladesh Labour Act 2006. http://bdlaws.minlaw.gov.bd/act-print-952/section-print-29070.html

[52] Jakir Hossain & Monsur Ahmed, "Economic and Social Upgrading of Smallholders in Rice Value Chains of Bangladesh: A Case Study."

[53] Ahmmed, Faruk, 'Women Participate in Agriculture, but Their Contribution Is Not Recognised' (Krishite narir angshogrohon ache, mullyayon nei). https://www.bonikbarta.com/editorial/ls7QBvWnYdMN4aib

a) To include in the labour law clear definitions of full-time, part-time, seasonal and temporary agricultural workers, considering the nature and timing of their work; and to specify precisely which types of work are to be recognised as agricultural activities.
b) To prepare lists, register workers and provide identity cards through the local government or administration, based on the type and nature of agricultural work they perform (e.g., full-time, part-time, seasonal or migrant agricultural workers).
c) To ensure social protection measures aimed at improving the working conditions and terms of employment of agricultural workers. During periods of job scarcity—particularly before the harvest of Boro and Aman paddy—landless and marginal workers should be provided with employment opportunities or allowances under social protection programmes.
d) To provide government-led training at the upazila level on the use of modern agricultural technologies and to enhance workers' technical skills. Women agricultural workers should be prioritised in such technology-based skill development initiatives.

6.2.2 Rice Mill Workers (Chatal Workers)

According to the Directorate General of Food, there are three types of rice mills in the country: husking mills, semi-automatic mills and fully automatic mills. Data from the Labour Inspection Management Application (LIMA) show that Bangladesh currently has 507 husking mills and 5,885 auto-rice mills.[54] However, there is no accurate figure regarding the total number of workers currently employed in these husking and auto-rice mills.

Although rice mill workers fall under the Labour Act, they are deprived of minimum benefits in most cases. The majority do not receive appointment letters or identity cards. Their working hours are unspecified[55]; wages are extremely low compared to the volume of work, and payment is often delayed[56]. There is also a gender-based wage gap between male and female workers.[57] Rice mill workers regularly work in hazardous and unhealthy environments.[58] They are deprived of maternity leave, medical benefits, compensation for accidents and other social protection measures.

To address the job insecurity and financial challenges of rice mill workers, the Commission recommends:

---

[54] Labour Inspection Management Application (LIMA), Department of Inspection for Factories and Establishments, Ministry of Labour and Employment, Government of the People's Republic of Bangladesh.

[55] Zakir Hossain, Mostafiz Ahmed, and Afroza Akhtar, "Minimum Wages of Workers Employed in the Rice Milling Industry: Rational Amount and the Rationality of the Amount" (*Chatal Shilpe Niyojito Shromiker Nyoonotomo Mojuri: Jouktik Poriman o Porimaner Jouktikota*), Institute of Bangladesh Studies, 2010.

[56] Haque, Md. Minhajul. "Auto Rice Mill Workers' Eid: No Need for Bonus, Give Us Our Salary (*Auto Rice Mill Kormider Eid: Bonus lagbe na, amader betan den*)." *Prothom Alo*, 4 June 2024. https://www.prothomalo.com/opinion/letter/08j70gmaed

[57] Dhaka Prokash, "Women Working in Rice Mills Receive Lower Wages than Men (*Purusher chaite kom mojuri pay chatal-e kormoṛto narira*)," *Dhaka Prokash*, 8 March 2024. https://www.dhakaprokash24.com/saradesh/rajshahi/60190

[58] Haque, Md. Minhajul, *Ibid*

a) To create alternative employment opportunities for unemployed rice mill workers—particularly women—through government-initiated training, or to facilitate their engagement in small businesses through easy-term loans.
b) To provide government-supported financial assistance on easy terms to free workers from the debt cycle (dadan/advance payment), in which workers take advance wages from mill owners during low-employment periods and later become tied to working for them or are forced to take loans from other owners, perpetuating indebtedness.

6.2.3 Tea Workers

Bangladesh's tea industry is a major sector for employment, production and export earnings. Given its importance, the Commission held multiple consultations with workers, worker representatives, owners, owner representatives and development partners in Dhaka, Chattogram, Sylhet and Moulvibazar. To ensure sustainable development through improved living standards, balanced industrial relations and enhanced productivity, a range of measures is necessary.Discussions with stakeholders highlight several distinctive characteristics of this sector that merit attention.

Historically, tea workers were brought from other regions of the subcontinent and have been living inside the tea estates for generations. Their socio-economic conditions differ from those of other labour groups in the country. A review of the Bangladesh Labour Act 2006 and statements from tea worker representatives indicates inconsistencies and disparities between legal entitlements and what tea workers actually receive, particularly regarding gratuity/pension, leave provisions and housing, which adversely affect their well-being. Conversely, employers have presented certain operational realities, pointing to the need for balanced and practical solutions in the sector.

Given the longstanding issues concerning productivity, discipline, safety, land rights, housing, healthcare, technical education, children's schooling, employment opportunities, regularisation, fair wages aligned with improved living standards, social inclusion and regular union elections, the Commission recommends forming a dedicated committee within six months. This committee should comprise worker and employer representatives, the government and relevant experts. It should review the applicable laws, consider opinions and recommendations gathered from stakeholder consultations, and prepare a comprehensive and realistic set of recommendations that would offer a holistic roadmap for resolving all existing issues in the tea sector.

6.3 Export-Oriented Industries and Area-Based Labour Groups

6.3.1 Garment (Ready-Made Garment/RMG) Sector Workers

About four million young men and women working in the RMG sector have contributed to establishing Bangladesh's global reputation. The industry has become a major driver of the

country's socio-economic development, contributing 10.35 per cent to GDP[59] and accounting for 82 per cent of total export earnings[60]. Despite its major contributions to economic growth, export performance and employment generation, the overall situation regarding workers' rights, protection and welfare in this sector remains concerning. Ensuring decent wages, good working conditions, safety and trade union rights is essential for the sector's long-term stability. Workers frequently face long working hours, insufficient weekly and other forms of leave, low wages and inadequate wage increments. The absence of meaningful trade union practices and the dual burden of paid and unpaid work for women workers are also key challenges.

To foster the development of both workers and employers in the garment sector and to ensure labour rights, welfare and livelihood security, the Labour Reform Commission recommends the following measures:

a) To relax trade union requirements so that workers' freedom of expression and genuine trade union rights are ensured.
b) To strengthen oversight mechanisms to ensure that all workers receive appointment letters specifying their terms of employment.
c) To undertake employer- and government-supported initiatives to provide retraining and new skill-development programmes so workers can adapt to technological transitions and changing industry needs. A specialised institution for training and skill development should be established, along with a proper certification system.
d) To establish adequate, high-quality daycare centres, housing facilities and community clinics within factories and industrial areas.
e) To ensure a harassment- and violence-free workplace by implementing the 2009 High Court directive, ILO Convention 190 principles and by setting up complaint mechanisms.
f) To formulate a clear policy for the promotion and career advancement of women workers, ensuring their upward mobility and greater participation in factory management.
g) To introduce necessary programmes at factory and community levels to ensure workers' mental health support, including the recruitment of professional counsellors in each factory.
h) To adopt a strategy requiring factories to disclose their automation and technological transformation plans, and the associated future job and skill requirements, in advance.
i) To ensure that no worker is compelled to do overtime on working days without consent. To introduce shift-based working arrangements to reduce excessive workloads and ensure proper weekly, sick and festival leave, given the persistent high production pressure in the sector.

[59] Bangladesh Bank (2023). Quarterly Review on Readymade Garments (RMG): April-June of FY23. External Economics Wing, Research Department, Bangladesh Bank.

[60] GoB (2023). Bangladesh Economic Review 2023. Dhaka: Ministry of Finance, Government of the People's Republic of Bangladesh

j) To stop the sharing of harmful worker-related information through BGMEA/BKMEA databases so that such information does not hinder future employment opportunities or cause any form of retaliation.
k) To expedite adjudication in the Rana Plaza and Tazreen accident cases and to ensure full assessment of compensation standards for affected workers.
l) To take state initiatives to protect and preserve RMG workers' heritage and historical sites, and to document their lives respectfully in textbooks, curricula, educational courses and the media.
m) To withdraw all politically motivated cases filed against workers and ensure proactive government support in providing legal protection.
n) To ensure the safety of women workers engaged in night shifts, including provision of employer-supported transportation.
o) To develop a National Workplace Safety Policy for export-oriented RMG industries in accordance with international standards and Bangladesh's socio-economic context, ensuring uniform compliance for both domestic and foreign stakeholders.
p) To establish a Safety Unit to oversee and enforce safety measures in all export-oriented industries, reporting to a high-level tripartite committee.
q) To formulate a medium-term roadmap to ensure the living standards and social protection of all workers, employees and officials in the garment industry.
r) To strengthen domestic technical capacity and institutional arrangements to ensure workplace safety, accountability and transparency through specialised national experts.
s) To establish a Just Transition strategy for the garment industry through a national government-employer-trade union partnership, and to form a monitoring unit to oversee Just Transition initiatives.

6.3.2 Shrimp Industry Workers

Approximately 14.7 million workers are engaged—directly or indirectly—in shrimp processing factories, shrimp farms (gher) and related occupations. About 80 per cent of these workers are women.[61] Workers in shrimp processing plants are paid less than the minimum wage set by the government. Although they are appointed for eight working hours per day, they often work up to twelve hours.[62]

Working conditions in shrimp farms are unsanitary. Workers lack resting shelters, and face shortages of toilets and safe drinking water. In some farms, stagnant and polluted water exposes workers to health risks. Women workers in fish landing centres are employed in shrimp processing

[61] "Female workers in the shrimp industry face discrimination; Deputy Speaker urges resolution of the issues," *Voice Ekattor*, September 30, 2023. https://voiceekattor.com/চিংড়ি-শিল্পে-নারী-শ্রমিক/

[62] S. M. Chandan, "Voices of Shrimp Industry Workers in Khulna." Weekly Ekota, March 16, 2025, https://www.weeklyekota. net/index.php/home?page=details&serial=12015.

at low wages. Prolonged exposure to saline water causes diarrhoea, dysentery, swelling, skin diseases, dizziness, miscarriages and increases the risk of uterine cancer.

Considering the health risks and working conditions of shrimp workers, the Commission proposes:

a) To ensure adequate health protection measures for all workers in the shrimp industry, including the regular provision of protective equipment (masks, gloves, gumboots, etc.) free of cost by employers, and compulsory use of such items.
b) To conduct periodic medical camps to assess health conditions, identify health risks and provide treatment, along with issuing health cards to all workers.
c) To ensure provision of resting spaces at workplaces, including separate resting rooms for women workers, breastfeeding corners, safe drinking water and toilet facilities.
d) To guarantee equal pay for equal work for both male and female workers in the shrimp industry.

6.3.3 Tannery Workers

The tannery sector in Bangladesh is highly labour-intensive. Seventy-six per cent of processed leather produced by the country's 220 tanneries is exported. Around 850,000 workers are employed directly or indirectly, 60 per cent of whom are women.[63] As in many other labour-intensive industries in Bangladesh, poor labour standards and unsafe workplaces are prevalent in the leather-tanning sector. Despite being relocated from Hazaribagh, the industry has not managed to prevent environmental pollution nor ensured basic labour rights such as appointment letters, contracts, minimum wages and occupational safety and health (OSH)[64]. Even in the Savar Tannery Industrial Estate, no medical centre or hospital has been established for workers' healthcare.

The number of temporary workers in the sector exceeds that of permanent workers. Many temporary workers remain unregularised even after 10–15 years of service.[65] According to the 2024 gazette notification issued by the Minimum Wage Board, the minimum wage for tannery workers is set at BDT 18,001 in Savar and BDT 17,048 in other areas[66], yet this remains unimplemented. Many workers are also deprived of benefits such as pensions, insurance and festival allowances.

---

[63] Bangladesh Investment Development Authority, "Leather and Leather Goods," Retrieved March 2, 2025, from https://bida.gov.bd/ storage/app/ uploads/public/650/adb/872/650adb872b637097610685.pdf

[64] Jitendra Nath Paul, "Savar tannery states: A project that offers lessons from errors," The Business Standard, 26 January 2022.

[65] Janakantha, "Deteriorating Conditions in the Leather Industrial City (Chamra Shilpanogore Ha-ja-ba- ra-la Obostha)," 24 June 2024. https://www.dailyjanakantha.com/different-news/news/724920.

[66] Nurnahar Akter Tania, "Tannery workers demand minimum wage Tk25,000," Textile Today, 30 March 2024

The Labour Reform Commission considers it essential to take urgent measures to ensure fair wages, job security and occupational safety and health for tannery workers. In this context, the Commission recommends:

a) To discontinue temporary recruitment through middlemen/contractors and ensure permanent employment of workers in compliance with labour law, including the implementation of all conditions of employment.
b) To ensure implementation of the minimum wage for tannery workers and to require the Department of Inspection for Factories and Establishments (DIFE) to prepare compulsory wage-implementation assessment reports.
c) To recruit specially trained labour inspectors for the tannery sector, considering its unique characteristics and chemical-related health hazards; and to conduct structured and controlled risk assessment exercises to evaluate workplace risks in this industry.
d) To formulate a separate Occupational Health Risk Policy for tannery workers and make recruitment of OSH officers mandatory in all tanneries under this policy.
e) To establish a specialised hospital for occupational diseases affecting tannery workers within the leather industrial estate.
f) To establish worker housing and schools for the children of tannery workers within the leather industrial estate.

6.3.4 Workers in Export Processing Zones (EPZs)

Export Processing Zones (EPZs) are special economic zones established to promote industrial development and increase foreign investment in Bangladesh, and they play a significant role in boosting the country's export earnings and employment generation. Currently, approximately five hundred thousand workers are employed across eight EPZs, of whom 66% are women. These workers are engaged in export-oriented industries such as ready-made garments, leather, electronics, plastics, textiles, and pharmaceuticals.

While the rights and entitlements of non-EPZ workers are protected under the Bangladesh Labour Act, 2006, those of EPZ workers are governed by a separate law—the Bangladesh EPZ Labour Act, 2019. Important differences exist between these two legal frameworks. Under the EPZ Labour Act, workers may form Workers' Welfare Associations (WWAs), which represent EPZ workers, although WWAs do not function as substitutes for trade unions. These associations are barred from establishing relationships with NGOs or engaging with external unions or federations. In addition, access to remedies through the labour court is significantly restricted and often inadequate.

In this context, the Labour Reform Commission proposes the following policy directions:

a) A unified labour law framework should be developed to ensure equal protection of labour rights for both EPZ and non-EPZ workers. Ideally, EPZ workers should be brought under the same labour legislation applicable to other workers, so that the rights available to non-EPZ workers become equally applicable to workers within EPZs.

b) The right of EPZ workers to seek remedies through the labour court should be guaranteed, and consideration should be given to allowing Workers' Welfare Associations to establish relationships with non-governmental organisations where relevant.

c) While recognising the distinctive operational conditions of EPZs, a separate labour law may be retained, provided that the rights and entitlements set out therein should be aligned with national labour legislation. In particular, EPZ workers should enjoy organising rights—including freedom of association (FoA), collective bargaining rights (CBA), and equal access to judicial and legal assistance—on parity with other workers in the country.

6.3.5 Dock and Port Workers

Although seaports in Bangladesh are operated under full government ownership, the existing governance and regulatory framework contains several structural and policy-related shortcomings. The Bangladesh Labour Act, 2006 includes specific provisions concerning port workers, but significant implementation challenges persist. Despite discussions on ensuring a safe working environment and fair wages, enforcement and monitoring mechanisms remain weak. Although rules and regulations exist regarding worker recruitment, these are not always followed in practice. Port workers carry out hazardous tasks but receive no risk allowances, festival allowances, or compensation in the event of injury or death. Essential safety equipment is also lacking.[67] Furthermore, Section 185(a) of the labour law restricts the trade union rights of port workers, contradicting their fundamental right to freedom of association.

Considering the current situation of dock and port workers, the Labour Reform Commission recommends the following actions:

a) Dock and port workers should be granted full trade union rights, in line with ILO Conventions 87 and 98 and the Bangladesh Labour Act, 2006. This requires repealing Section 185(a), which restricts their freedom of association.

b) All benefits gained through bilateral and tripartite agreements should be preserved, and the provisions of the Memorandum of Understanding adopted in the inter-ministerial meeting of 25 October 2010 should be implemented—particularly the establishment of a trustee board to ensure by-rotation booking for workers.

c) All workers employed through berth operators should be regularised, incorporated under the labour wing of the port authority, provided with appointment letters and identity cards, and offered rotational work arrangements to eliminate wage disparities.

[67] "To state it clearly, we are the ones who will build a new Bangladesh(Spashta kore bolte chai, amra tarai, jara natun Bangladesh binirman korbo)," *Prothom Alo*, 22 December 2024. https://www.prothomalo.com/bangladesh/district/bsz32wgdob

d) Workers should receive risk allowances, festival allowances, and pension benefits, consistent with provisions available to other categories of port workers.

e) No new contracts should be signed with private companies whose agreements have expired or are nearing expiration, and steps should be taken to discontinue all processes that lead toward port privatisation, ensuring that all port activities remain under state management.

f) New outsourcing and contractual hiring of port workers should be discontinued to ensure stability of employment.

g) All current workers, including those verified by the labour wing of the port authority, should be issued official port identity cards.

h) Measures should be adopted to ensure the protection of all workers from occupational accidents and related risks.

6.4 Industry-Based Labour Groups

6.4.1 State-Owned Closed Mills

The jute industry has historically played a critical role in Bangladesh's economy. After independence, the sector was nationalised in hopes of strengthening the country's socio-economic foundation, and the Bangladesh Jute Mills Corporation was established. Over time, however, corruption, mismanagement, inefficiency and poor governance led to a gradual decline, resulting in the closure of one jute mill after another. Layoffs and unpaid wages reduced workers' motivation, leading to labour unrest, worker agitation, and broader social instability.[68] In contrast, many privately-owned jute mills continue to operate profitably.[69]

On 1 July 2020, the government shut down 25 jute mills, along with several others over different periods, rendering almost 50,000 workers unemployed.[70] Many workers face prolonged delays in receiving their wages and dues, and many have yet to be paid. Ensuring a decent and dignified life for these workers requires targeted state intervention. In this context, the Commission puts forward the following recommendations:

a. The leasing of the closed state-owned jute mills should be discontinued, and all closed mills should be reopened under direct state supervision.

[68] Ibid
[69] "The government shut down Bangladesh's state-owned jute mills — who is truly responsible? (Bangladesher sarkari patkolguli bondho korlo sarkar, day āsale kar)" BBC News Bangla, 11 July 2020. https://www.bbc.com/bengali/news-53360302
[70] Ibid

b. Steps should be taken to restart production in the mills, guided by expert recommendations and proposals previously made by trade unions and specialists, and integrated into a coordinated plan aimed at making the jute sector and jute cultivation sustainable.

c. The losses caused by shortsighted policies, bureaucratic corruption, and administrative inefficiencies call for a high-level inquiry and review.

d. Schools, hospitals, and other service institutions located in mill areas should be operated properly to ensure uninterrupted education and essential services for workers' families.

e. A national-level action plan should be undertaken to revitalise the jute sector, covering jute cultivation, production, and export.

f. Workers who were deprived of their lawful dues at the time of mill closures should receive compensation and payment of outstanding wages and entitlements to help restore their livelihoods.

g. Closed mills should be repurposed into labour-intensive industries based on local raw materials and socio-economic needs, thereby creating employment opportunities for displaced workers.

h. Training and alternative skill-building programmes should be arranged for jute-mill workers and eligible family members, prioritizing their reemployment.

6.4.2 Ship-Breaking Industry

Reliable data on the number of workers in the ship-breaking industry remain scarce due to the absence of official statistics. Various reports indicate that in 2020, approximately 50,000 workers were directly employed and another 100,000 were indirectly engaged in the sector.[71]

Despite its contributions to economic growth, the industry faces longstanding concerns regarding fair wages, workplace safety, and occupational health. Workers are typically hired through contractors at wages ranging from Tk. 300 to Tk. 400 per day, without overtime pay despite working 10–12 hours daily. Workers do not receive appointment letters or identity cards. Although labour law grants freedom of association, workers face significant obstacles in organizing and often face intimidation or dismissal for attempting to form unions. In addition, workers have limited opportunities to participate in decision-making processes, which creates obstacles to protecting their rights and interests.[72] Workers are regularly exposed to hazardous materials without adequate personal protective equipment (PPE) As a result, many work for years under life-

[71] Meraj Hasan and Raya Tabassum, "The Vast Potential of the Shipbreaking Industry, (Jahaj bhanga shilper opar sambhabana)" *Dainik Inqilab*, 5 March. https://m.dailyinqilab.com/article/272865/জাহাজ ভাঙা শিল্পের অপার সম্ভাবনা
[72] Human Rights Watch, 'Bangladesh: Shipping Firms Profit from Labour Abuse', 27 September 2023. https://www.hrw.org/bn/news/2023/09/28/bangladesh-shipping-firms-profit-labour-abuse

threatening conditions.[73] From 2010 to 2018, nearly 900 workers were killed or injured in this sector.[74]

In light of these challenges, the Commission recommends the following:

a. Workers should be supported through social protection benefits and distribution of the daily necessaries during the interim periods between the dismantling of one vessel and the start of another.

b. Accident rates should be reduced through the adoption of modern technology, improved design and processes, and enhanced worker training aimed at safe and efficient production.

c. To mitigate exposure to hazardous substances and environmental contamination, workplaces should include safe bathing facilities and the provision of protective clothing, ensuring workers do not return home wearing contaminated garments.

d. The Department of Inspection for Factories and Establishments (DIFE) should strengthen monitoring to ensure that hazardous zones are properly colour-coded and risks are clearly identified. Workers should receive regular training on risk awareness, colour codes, and emergency procedures.

e. The legal process for registering trade unions should be simplified, with registration allowed on an enterprise basis. Given that the industry is concentrated in Chattogram, the requirement of multiple divisional unions for forming a federation should be waived.

f. Measures should be taken under labour law to prevent intimidation and dismissal related to union activities.

g. Workers should receive appointment letters, job continuity, and legally mandated end-of-service benefits, including gratuity.

h. A permanent system should be established for the medical care and rehabilitation of injured or ill workers, including former workers.

i. Previous accident investigation reports should be made public, with accountability enforced and recommendations implemented to improve working conditions.

j. Yard-level safety committees and area-based environmental and safety committees involving community members should be established, recognizing the unique characteristics of the industry.

k. Regular testing and environmental research should be conducted to monitor the impact of operations on agricultural land and water bodies. Measures should ensure that hazardous materials

---

[73] Fazlul Kabir Mintu, "Workers in the Shipbreaking Industry at Risk (Jhukite jahaj bhanga shilper shromikera)," bdnews,18 March 2018. https://bangla.bdnews24.com/blog/233043

[74] "Shipbreaking Industry in Environmental Crisis (Poribesh biporjoye jahaj bhanga shilpo)," *Dainik Karatoa*, 11 January 2025. https://www.dailykaratoa.com/article/113709

are not discharged into marine waters, and that ships are fully decontaminated prior to entering Bangladesh's maritime boundary. All relevant agencies should coordinate to expedite ship inspections and cutting approvals.

l. Workers who lose their jobs due to technological upgrades or compliance with the Hong Kong Convention should be identified and provided with alternative employment opportunities, along with interim allowances until such employment is secured.

6.4.3 Small-Scale Footwear Industry Workers

Small footwear factories are predominantly located in Dhaka, Bhairab, Chattogram, and Brahmanbaria. With more than 11,000 factories, the sector employs over 400,000 workers.[75] However, job insecurity, low wages, child labour, forced labour, unsafe conditions, capital shortages, and limited technological capacity are widespread.

Although minimum wages were declared in 2020 for the "Leather Goods and Footwear Factories" sector, implementation remains weak in small, non-branded factories.

Workers face multiple health risks from exposure to harmful chemicals, such as skin diseases, mucosal irritation, eye problems, and chronic pain due to prolonged static posture.[76]

The local entrepreneurs struggle with shortages of skilled artisans, insufficient capital, and high-interest bank loans. Due to high interest rates on bank loans and the limitations in obtaining loans on easy terms, many entrepreneurs are unable to expand their businesses or implement technological improvements[77]

In this context, the Commission recommends:

a. Labour inspection mechanisms should be strengthened to ensure compliance with legal working hours and minimum wage standards.

b. Dedicated industrial zones for small enterprises should be established, with access to long-term, low-interest, collateral-free loans and reduced import duties on raw materials, alongside improved worker training.

c. Municipalities should allocate small designated workspaces for footwear workers in key city locations—markets, bus terminals, intersections, and office areas—with coordinated management

---

[75] Prakash Dutta, "Footwear Workers: Minimal Wages and Life Without Dignity (Paduka shromik: nam matro mojuri ar morjadaheen jibon)," *Sarbajanakotha*, 7th Year, 4th Issue.

[76] J. Nieves Serratos-Perez and Carlos Mendola-Anda, "Musculoskeletal disorders among male sewing machine operators in shoemaking," *Ergonomics* 36, no. 7 (1993): 793-800.

[77] "Footwear Industry of Potential Faces Crisis in Financing and Skilled Labour (Sambhabnar paduka shilpe sankat arthan o dokkho kormir),"BD News, 4 January 2025.

by local administration, worker groups, and entrepreneurs. These spaces should provide electricity, water, and sanitation to enhance worker productivity and occupational health.

6.4.5 Furniture Workers

At present, around 2 million workers in the country earn their livelihood by working—either on a monthly wage or daily attendance basis—in roughly 40,000 furniture establishments,[78] most of which fall under cottage, micro, or small enterprises. Many workers are hired informally and without appointment or identity documents. Exposure to wood dust, varnish, adhesives, and fumes contributes to respiratory diseases, skin disorders, asthma, and other complications. Certain chemicals are linked to kidney and liver damage, as well as central nervous system disorders.[79] PPE is rarely provided, and workers lack hearing protection despite continuous exposure to high-noise environments.

The Commission considers the following steps necessary:

a. Furniture workers should receive all entitlements outlined in labour law, including regular wages, leave benefits, PPE, safe working environments, clean water, and sanitation.

b. A legally mandated minimum wage should be introduced for the furniture industry, reflecting the nature and complexity of the work.

c. Employers should supply appropriate safety equipment and ensure effective noise-control measures.

d. Workers should undergo periodic medical examinations to assess occupational diseases, with reports submitted to relevant government departments.

e. Additional technical schools and short-term training programmes should be established to improve worker skills, engaging both government and private sector actors.

f. Women's participation should be enhanced through targeted skill-building programmes and incentives for female entrepreneurs, including interest-free or mortgage-free loans.

[78] Sukanta Halder, "Shortage of Quality Raw Materials and High Duties Are the Main Obstacles for the Furniture Industry," The Daily Star Bangla, November 10, 2022. https://bangla.thedailystar.net/economy/industry/news-414381

[79] Dr Asli Tamer Vestlund (2013), Health and Safety in the Furniture Industry, Furniture and Joinery production. https://www.furnitureproduction.net/ resources/articles/2013/10/1551098359-health-and-safety-furniture-industry

6.4.6 Stone-Breaking Workers

Stone-processing activities are concentrated in Lalmonirhat, Panchagarh, and Sylhet. Although exact numbers are unavailable, estimates suggest over 50,000 workers in Sylhet,[80] 40,000 in Lalmonirhat,[81] and 10,000 in Panchagarh,[82] with women making up around 40% of the workforce[83]. Stone breaking poses severe health risks, including silicosis. Research shows that 89% of stone-cutters experience chronic respiratory issues, including chest tightness (76%), shortness of breath (74.5%), and persistent cough (66.5%).[84]

Stone-breaking sites are not only hazardous for workers but also harmful to the environment. Most factories are operating without registration, and there are no health or safety measures for the workers.[85] In addition, the factories are running without any environmental clearance, which is disrupting the ecological balance.

The Commission recommends:

a. Workers should receive pre-employment and periodic health screenings—including chest radiographs and lung function tests—with monthly check-ups supported by employers.

b. DIFE, labour welfare centres, and local healthcare providers should coordinate regular diagnosis and treatment of silicosis, including at least one annual health camp for workers.

c. Environmental safeguards should be strengthened through regular monitoring of stone-breaking sites by the Department of Inspection for Factories and Establishments.

---

[80] Bappa Maitra, "Around 1,500 illegal stone crushing mills in Sylhet jeopardising public health, degrading environment," bdnews24.com, December 01, 2024, https://bdnews24.com/bangladesh/0851b252e98d

[81] S. Dilip Roy, "Forty Thousand Stone Workers Deprived of Fair Wages," The Daily Star, May 1, 2022.

[82] M. Mobarak Hossain, "Thousands of Women Break Stones Just Like Men, Yet Face Wage Discrimination," Dhaka Mail, 8 March 2023. https://dhakamail.com/country/76089

[83] S. Dilip Roy, "Forty Thousand Stone Workers Deprived of Fair Wages," The Daily Star, May 1, 2022.

[84] Shamim Ahmed, Shah Ashiqur Rahman Ashiq Choudhury, Abir Hasan Dip, Taposh Bose, Ashis Kumar Sarkar, Mohammed Atiqur Rahman, and Jannatul Ferdous, "Respiratory symptoms, spirometric, and radiological status of stone-cutting workers in Bangladesh: A cross-sectional study," *Health science reports* 5, no. 5 (2022): e753, https://doi.org/10.1002/hsr2.753

[85] Abu Siddique, "Stone crushing industry exposes workers to deadly silicosis disease," Dhaka Tribune, September 28, 2017, https://www.dhakatribune.com/bangladesh/nation/126805/stone-crushing-industry-exposes-workers-to-deadly

6.5 Service-sector-based Worker Groups

6.5.1 Railway Workers

At present, approximately 25,083 regular employees are engaged in the railway sector.[86] In recent years, recruitment of workers and staff has increasingly taken place on a temporary basis, which has resulted in workers being deprived of their legitimate rights. Many temporarily appointed workers have been serving for extended periods without regularisation of their jobs, leading to dissatisfaction and a sense of insecurity. Additionally, several posts have already been outsourced, and outsourcing continues, weakening employment security and undermining welfare and protection structures for workers in such posts.[87]

To enhance the public-welfare orientation of this sector, it is considered necessary that all employees and workers associated with railway services be recruited through transparent and accountable procedures that safeguard labour interests. The Commission sets out the following recommendations:

a) All major decisions are to take account of the views of workers and trade unions. Strengthening industrial relations through regular bipartite meetings and dialogue at all levels is regarded as instrumental for resolving emerging issues and advancing sectoral development.

b) The Recruitment Rules 2020 are to be amended so that essential technical posts in the 3rd and 4th classes are filled through the railway's own recruitment committee rather than the Public Service Commission (PSC). The current rules have created complications in recruitment and promotion, generating frustration among employees. Consideration is to be given to reinstating the previous system of two separate zonal committees for promotions, rather than a centralised structure, in order to expedite promotions of departmental heads.

c) Outsourcing in the railway sector is to be discontinued, and the earlier system of appointing TLR/temporary labourers is to be reinstated to maintain a steady flow of skilled workers.

6.5.2 Inland Water Transport Workers

In Bangladesh, 50 per cent of all freight transport and one-quarter of passenger transport takes place along inland waterways. The number of vessels is increasing, with 22,300 registered ships currently operating. In addition, a substantial portion of the country's 750,000 traditional boats has been converted into mechanised vessels (trawlers), of which roughly 65 per cent are passenger carriers, mainly serving rural communities, while many are used for transporting goods. At least 200,000 workers are employed in water transport. Despite the heavy reliance on waterways for

[86] A Brief History of Bangladesh Railway, Bangladesh Railway. Government of the People's Republic of Bangladesh. https://railway.gov.bd/site/page/ce7dd6af-c7c8-4811-86b3-ba871e2e406e/

[87] "Temporary Workers' Blockade, Rail Communication with Dhaka Disrupted Across the Country," Bangla Tribune, 17 December 2024.

import and export cargo movement, the living standards and safety of water transport workers remain largely neglected.[88]

In view of the present situation, the Commission recommends:

a) A wage board is to be constituted, in accordance with labour law and taking into account prevailing market prices, to determine time-appropriate minimum wages for water transport workers.

b) Social security for water transport workers is to be ensured by establishing a contributory provident fund under the Sailors' Welfare Fund and Trustee Board. Bringing all owners' associations onto a single platform is viewed as essential for this purpose.

c) As most workers in this sector do not receive appointment letters or identity cards, steps are to be taken to ensure their issuance, along with strengthened government monitoring to enforce compliance.

d) Given the frequent exposure of water transport workers to piracy and robbery, adequate security measures are to be ensured at every port and along all waterways.

6.5.3 Road Transport

According to BRTA data, Bangladesh currently has 5.897 million registered motor vehicles, the majority of which fall under the transport sector. It is estimated that around 10 million workers are engaged in this sector, although precise numbers remain difficult to ascertain.[89] Despite legal provisions for appointment letters and worker protection within the Motor Vehicles Ordinance 1983, the Labour Act 2006, and the Road Transport Act 2018, implementation remains weak. Private owners often employ workers informally to maximise profit.

Most transport workers work between 13 and 15 hours daily, and 90 per cent do not receive weekly holidays.[90] This contributes to physical and mental health deterioration, which in turn is a major factor in road accidents. A fair wage structure for bus drivers and helpers has not evolved. Many drivers operate buses under daily contractual arrangements, where income depends on the amount submitted to the owner, with the remainder kept as earnings. In cases of accidents, neither workers

[88] Bangladesh Inland Water Transport Authority (BIWTA), January 2016, Executive Summary on Environmental and Social Assessment, Bangladesh Regional Inland Water Transport Project–1 (Chattogram–Dhaka–Ashuganj Corridor), Government of the People's Republic of Bangladesh, Ministry of Shipping

[89] 'The Wheels of Life for Ten Million Transport Workers Come to a Halt (Ek koti poribohon shromiker jibon-er chaka thomke)'; 08 November 2023, Daily Desh Rupantar

[90] According to research by the Bangladesh Institute of Labour Studies (BILS), approximately 86 per cent of drivers in the transport sector work more than 13 hours a day, and 90 per cent do not receive any weekly leave. In particular, among workers engaged in long-distance public transport, more than 50 per cent work over 15 hours daily, and 20 per cent receive no rest at all

nor their families receive compensation. Although funds are collected in the name of worker welfare, workers do not receive assistance when needed.

The Labour Reform Commission considers that a specific labour policy, fair wages, adequate health and safety measures, and an institutional recruitment structure are urgently required for transport workers. The following recommendations are proposed:

a) The Road Transport Policy 2022 is to be revised to create a time-appropriate policy, and inconsistent provisions of the Road Transport Act 2018 are to be amended through discussions with owners' and workers' representatives. Revisions are also to bring all actors involved in road construction, management, operation and road use under a framework of accountability.

b) Specific working hours and adequate rest periods for transport workers are to be ensured. Resting facilities equipped with basic amenities are to be established at regular intervals along major highways.

c) Workers injured in road accidents are to be provided with appropriate treatment and financial support through contributions from both owners and the government. An accident insurance scheme is to be introduced for all transport workers.

d) Road safety audits are to be conducted before and after the construction of highways and expressways, with emphasis on strengthening road safety management.

6.5.4 Rickshaw/Battery Rickshaw–Easybike/Van Drivers

Rickshaws—particularly battery-powered rickshaws and easybikes—constitute one of the main modes of passenger transport in Bangladesh. The number of rickshaws operating in Dhaka, both licensed and unlicensed, is approximately 1.5 million [91], and nationwide there are more than six million three-wheelers and vans[92]. This sector provides employment to 7–7.5 million families, and approximately 25 million people depend on it for their livelihood. Rickshaw pullers largely come from marginalised, low-income backgrounds and frequently migrate to cities due to climate-induced displacement, lack of agricultural employment, limited education, and lack of capital.

[91] Sanjana Chowdhury, 'Rickshaw Chronicles: When, From Where, and Who First Brought This Vehicle to Bangladesh (Rickshaw Brittanto: Kobe, Kotha Theke, Ke Prothom Ei Bahonti Bangladesh-e Anen),' BBC Bangla, Dhaka, 27 November 2021. https://www.bbc.com/bengali/news-59214407

[92] Anowar Hossain, 'The Growth of Battery Rickshaws Is Now Unmanageable (Battery Rickshaw barte diye ekhon samlan jaachhe na) ,' Prothom Alo, 21 November 2024. https://www.prothomalo.com/bangladesh/capital/b4pe9wztea

Rickshaw workers typically live in substandard conditions, lacking access to safe food, clean water, healthcare,[93] sanitation, secure housing and social dignity. A driver earns on average 700–800 taka per day, but a large portion is spent on garage rent or instalments. Many have purchased rickshaws or easybikes through microcredit loans and face weekly pressure to repay instalments.

Restrictions on the movement of battery rickshaws in cities—due to their speed—have eliminated the only source of income for many workers. Yet these vehicles are environmentally friendly, compatible with renewable energy, more energy-efficient, and cost-effective for passenger transport.[94] The Commission considers that design improvements, speed regulation, driver training and a realistic policy framework could bring the sector under orderly management, creating safe and dignified livelihoods for rickshaw and van drivers.

The Commission recommends the following:

a) Service roads or by-lanes for easybikes, rickshaws and other battery-powered or low-speed local vehicles are to be constructed along all roads and highways to reduce disorder and accidents. Dedicated parking areas equipped with toilets and clean water facilities are to be established.

b) Design modernisation and correction of technical faults in battery-powered or three-wheeled vehicles are to be carried out to reduce accidents, along with the introduction of speed regulation. A task force comprising mechanical, electrical and transport experts from engineering universities is to be formed for design modernisation, and local manufacturers are to be trained to produce vehicles according to the task force's approved designs.

c) The "Three-Wheeler and Similar Motor Vehicles Management and Control Policy 2024" is to be finalised, gazetted, and implemented without delay.

d) Licensing procedures for battery-powered vehicles at the city corporation, police station, upazila and municipality levels are to be simplified, and all drivers are to receive government-supported training and driving licences.

e) Charging stations for electric and battery-operated vehicles are to be installed to prevent electricity theft and wastage, thereby also creating new employment opportunities.

f) Workers' means of livelihood are not to be destroyed or confiscated under any circumstance. Enforcement personnel are to be sensitised accordingly, and appropriate accountability measures are to apply where such incidents occur.

---

[93] Nearly 94 per cent of rickshaw drivers suffer from illness. Munni Akter, 'I used to work before, but it doesn't sustain me' – a rickshaw driver from Dhaka," BBC Bangla, 27 June 2019. https://www.bbc.com/bengali/news-48788566

[94] While transporting a single passenger in a battery-operated vehicle costs only 13 poisha, in other modes of transport it costs a minimum of 57 poisha. Imran Habib Rumon, 'Battery-Operated Rickshaw-Van, Easybike: Questions of Employment, Science and Technology,' Sarbajan Kotha, 7th Year, Issue 4 (2021). https://sarbojonkotha.info/sk-28-battery-rickshaw/

6.5.5 Construction Workers

Despite the major contribution of the construction sector to Bangladesh's economy, employment in this sector is generally characterised by job insecurity, low wages and hazardous working conditions. Construction workers do not enjoy assured year-round employment. A study indicates that 80 per cent of workers are hired on a daily wage basis.[95] This informality in employment is even more pronounced for women workers. Ninety percent of female workers are employed on a daily-wage basis, whereas male workers are comparatively employed on monthly or piece-rate terms.[96]

Beyond insecurity and informality, construction workers face low wages and irregular payment. Occupational safety risks are widespread due to inadequate protective equipment, insufficient training, employers' reluctance to provide safety gear, exposure to harmful chemicals, excessive noise and dust, and lack of proper sanitation facilities. This greatly increases health risks as well as the incidence of accidents and fatalities. Moreover, factory inspectors under the Ministry of Labour and Employment do not regularly or adequately inspect construction sites.

A significant proportion of Bangladeshi migrant workers are also engaged in the construction sector abroad, particularly in the Middle East, where construction workers constitute almost **60 per cent** of Bangladeshi overseas labour.[97] Enhancing skills and facilitating migration for aspiring construction workers is essential.

The Commission considers the following measures vital for strengthening the rights and welfare of construction workers:

a) Employment insecurity is to be reduced by ensuring job opportunities and inclusion for all construction workers, alongside addressing wage discrimination and expanding opportunities for women workers.

b) Appropriate working conditions and occupational safety and health standards are to be ensured in building construction. Shortages in inspection staff at the Department of Inspection for Factories and Establishments (DIFE) are to be addressed to enable more frequent inspections of construction sites.

---

[95] Jakir Hossain, Afroza Akter, Mostafiz Ahmed, Md. Mahmudul Haque, and Sekender Ali Mina, "Workers Rights in the Construction Sector of Bangladesh" Safety and Rights Society 2024, Page 30.

[96] Ibid

[97] Laurent Bossavie, "Low-skilled temporary migration policies: The case of Bangladesh," *background paper to the World Development Report* (2023).

c) To improve workers' living conditions, the establishment of government-supported colonies for construction workers—equipped with rationing facilities, long-term affordable leasing options, schools and health centres—is to be undertaken.

d) The Labour Act is to include provisions for lifetime-equivalent compensation for workers who are injured, killed or permanently disabled due to workplace accidents, and effective implementation of such provisions is to be ensured. A dedicated insurance scheme for construction workers—given their work at elevated heights—is to be introduced.

e) In cases of accidental deaths, both the principal owner of the establishment and the developer are to be held responsible for providing compensation.

f) Skill development and orderly migration processes for aspiring migrant construction workers are to be strengthened. Passport and visa processing are to be simplified; government-run vocational training programmes are to be expanded; easy-term loans through the Probashi Kalyan Bank are to be ensured; employment contracts are to be verified by government authorities; and job terms, wages and employment guarantees are to be confirmed prior to departure.

6.5.6 Private Health Sector

Over the past four decades, a major portion of healthcare services in Bangladesh has shifted into private ownership. According to the World Health Organisation, 65 per cent of healthcare in Bangladesh is delivered by private hospitals, clinics and diagnostic centres.[98] Significant capital investment is flowing into this sector, which has now expanded beyond metropolitan and district towns to upazila and union levels. Although no definitive national census exists, an estimated one million workers and employees are engaged in the private health sector.

To address the current situation of private health sector workers, the Commission proposes the following reforms:

a) Although private health workers are legally entitled to protection under the Labour Act, a large proportion do not receive these benefits. Strengthened government oversight is viewed as essential to ensure that all legal rights are upheld.

b) To prevent wage deprivation, a minimum wage board is to be constituted to determine a living minimum wage for private health workers based on prevailing market conditions.

c) Maternity leave and other social benefits for women workers are to be ensured. Social security and insurance mechanisms for all workers are to be established so that illness or loss of employment does not lead to financial hardship.

[98] "Healthcare in Bangladesh's Private Sector," Prothom Alo, 28 November 2021. https://www.prothomalo.com/lifestyle/বেসরকারি-খাতে-বাংলাদেশের-স্বাস্থ্যসেবা

d) Workers and employees in this sector currently receive no share of institutional profits. It is therefore considered necessary for all registered private, corporate and joint-ownership institutions to provide annual balance sheets and ensure worker participation in the sharing of profits.

6.5.7 Hotel and Restaurant Workers

The number of hotels and restaurants in the country is increasing steadily, accompanied by rising labour participation in this sector. According to the Bangladesh Bureau of Statistics, the total number of workers employed in this sector exceeds 2.071 million, of whom 1,970,970 are men and 100,737 are women.[99] Hotel and restaurant workers do not have regulated working hours, and the prevailing wage structure remains inadequate (the latest declared minimum wage in 2017 was Tk. 3,710).[100] Most workers in this sector are employed on a temporary or seasonal basis. More than one-third work nine to ten hours a day, while another one-third work eleven to twelve hours daily. Additionally, over one-fourth of the workers work continuously without breaks or rest.[101] Thirty-two per cent of hotel and restaurant workers are paid on a daily basis, while the remaining 68 per cent are paid weekly or monthly—often inadequately.[102]

Workers in this sector are typically employed through verbal contracts, resulting in no job security. Child labour is also prevalent, with children informally employed as table boys or waiters. Although the law sets a six-hour workday for child workers, employers often require them to work twelve hours, while paying only Tk. 80–120 per day. Despite performing similar tasks as adults, they receive significantly lower wages and have little means to protest.

Recommendations of the Commission for the Welfare of Hotel and Restaurant Workers

a. Written appointment letters or contracts should be mandated by employers to ensure job security, and government oversight—particularly by the Department of Inspection for Factories and Establishments (DIFE)—should be strengthened to ensure compliance.

b. Weekly one-and-a-half days of leave, paid leave, festival allowances, and other benefits stipulated in labour law should be ensured for all hotel and restaurant workers.

---

[99] BBS, *Hotel and Restaurant Survey 2021*, Bangladesh Bureau of Statistics, Statistics and Informatics Division, Ministry of Planning, Government of the People's Republic of Bangladesh, 2022.

[100] The most recent year in which the government set minimum wages for all categories of workers employed in various industrial establishments, and the minimum total wage for the lowest grade. https://mwb.portal.gov.bd/sites/default/files/files/mwb.portal.gov.bd/page/8157a5ff_d278_4cbe_92ba_8b010a3b6851/2024-12-03-10-20-9c930c5fd8de477fe0030df425d0b605.pdf

[101] BILS, Internship Study Reports on Four Sectors. https://bilsbd.org/wp-content/uploads/2019/02/Internship-Study-Report_BILS.pdf

[102] Ibid

c. Seasonal layoffs during Ramadan—whereby many hotels suspend workers for one to one-and-a-half months—should be addressed by establishing measures to prevent such layoffs and by introducing relevant social protection programmes for affected workers.

d. Strict enforcement of child labour laws and the provision of education for children working in this sector should be pursued.

6.5.8 Domestic Workers

According to the Labour Force Survey 2015–16 of the Bangladesh Bureau of Statistics, approximately 1.069 million workers are engaged in household work, of whom 80 per cent are women and 20 per cent are men. Among them, 69.6 per cent work in urban areas and 37.3 per cent in rural areas.[103] Because domestic workers are not included in the Bangladesh Labour Act, this large group of workers remains classified as part of the informal sector.To address their vulnerability, the Domestic Worker Protection and Welfare Policy was formulated in 2015. However, due to the absence of enabling legislation, effective implementation of the policy has not been possible.

Domestic workers are generally employed through verbal agreements without appointment letters, making their rights difficult to claim and protect. Both permanent and temporary domestic workers exist, with a significant portion of live-in workers being children.[104] They are deprived of fair wages, health care, rest, safety, and access to government welfare programmes.[105] Additionally, most domestic workers are unaware of services available from support organisations.

Recommendations of the Commission for Improving the Status and Legal Rights of Domestic Workers

a. Domestic workers should be recognised as workers under the Bangladesh Labour Act, and until that inclusion is achieved, the Domestic Worker Protection and Welfare Policy 2015 should be fully and properly implemented.

b. A clear and mandatory employment contract should be established for all domestic workers—residential, non-residential, part-time, or full-time—specifying working hours, wages, leave, food, accommodation, and other facilities, along with clear procedures for filing complaints against employers.

---

[103] Workers_Situation_Analysis_Report_2019_BILS.pdf?utm_source=chatgpt.com

[104] Workers_Situation_Analysis_Report_2019_BILS.pdf?utm_source=chatgpt.com

[105] "Rights of Domestic Workers in Bangladesh: Current Context and Required Actions," DeshNewsBD, 24 January 2025. https://deshnewsbd.com/%E0%A6%AC%E0%A6%BE%E0%A6%82%E0%A6%B2%E0%A6%BE%E0%A6%A6%E0%A7%87%E0%A6%B6/3347

c. Considering the scale, demand, and importance of household work, domestic workers should receive government-supported training to enhance existing skills and develop new ones, enabling better employment opportunities and improved job security.

d. The recruitment of children under the age of 14 as domestic workers should be legally prohibited and effectively enforced.

e. Domestic workers should be granted the right to form organisations or trade unions.

6.5.9 Care Workers

Reliable data on Bangladesh's care sector—its total size, number of workers, and gender ratios—is lacking. Most care workers lack decent work conditions, and the sector suffers from inadequate regulatory oversight. Research shows that workers engaged in domestic care, nursing, health services, childcare, and elderly care in Dhaka and Chattogram face a range of vulnerabilities, including the absence of overtime payment, insecure employment, and unsafe working environments. Seventy-five per cent receive no additional remuneration for extra work; 40 per cent lose jobs without prior notice; and 57 per cent face health risks from illness or viral infections. Moreover, 17 per cent face risks related to combustible materials, yet fewer than half of employers provide safety information or personal protective equipment.[106]

Recommendations for the Improvement of Care Workers' Conditions

a. A comprehensive listing of all public and private childcare centres should be prepared, and their operations should be brought under a defined policy framework. In public childcare centres, permanent recruitment and a skills-based approach should replace outsourcing.

b. Government initiatives should provide timely, skill-enhancing training for care workers to improve employment prospects both domestically and abroad.

c. To expand the care economy, private and individual initiatives for establishing care centres should receive incentives, and all centres should be operated under a standardised model.

d. To support workers with family responsibilities, national legal and policy frameworks should establish flexible work arrangements—including employment type, contracts, working hours, and leave provisions—and workplace-specific policies should be developed accordingly.

e. ILO Conventions 156 and 183 relating to care workers should be ratified.

[106] Mostafiz Ahmed, Decent Work Status of the Care Workers: A Rapid Assessment, ILO and BILS, 2024.

6.5.10 Beauty Parlour Workers

The beauty parlour industry has expanded significantly, creating increased employment opportunities for women—particularly low-educated women from low-income and indigenous backgrounds. There are currently an estimated 350,000 registered parlours in the country.[107]

Despite their contribution to the economy, beauty parlour workers are largely deprived of labour rights.[108] Although included under labour law, their legal recognition and associated rights are often not upheld. Most workers lack appointment letters and identity cards, leaving them without job security. Long working hours, inadequate leave, irregular wages, and excessive overtime are common. The absence of a minimum wage structure forces many workers to accept low wages.

Recommendations for Ensuring Decent Work and Social Dignity for Beauty Parlour Workers

a. Labour law provisions relating to recognition, rights, and welfare should be fully applied to protect the professional, economic, and social status of beauty parlour workers.

b. A minimum wage board should be established for this sector to determine a wage structure based on work standards and risks, along with promotion pathways based on skill and experience.

c. Personal protective equipment and a clear set of occupational safety guidelines should be provided to ensure workers' health and safety.

d. Measures should be taken to prevent harassment at workplaces and during late-night travel, and community-based initiatives should be introduced to support workers' social dignity, safety, and security.

e. Beauty parlour workers should be included within social protection programmes, particularly with regard to health care and childcare (day-care) services.

6.5.11 Community Centre and Decorator Workers

Community centres and decorator services now play a central role in hosting social events, creating livelihoods for many workers. Despite contributing to the country's economic activities, workers in this sector experience extremely poor living conditions. They are not provided appointment letters or identity cards, increasing insecurity in their employment.

Wages are very low—community centre workers typically earn Tk. 400 per day and decorator workers Tk. 500 per day. Even during peak seasons, their monthly income rarely exceeds Tk.

[107] Roya Muntasir, "The Beauty Parlours of This Country," Prothom Alo, 27 August 2019.

[108] Jakir Hossain, Mostafiz Ahmed, and Afroza Akhter---------

5,000–6,000. They receive no regular benefits such as leave, festival allowances, overtime payment, or social protection.

Recommendations for Safeguarding Labour Rights and Improving Living Standards

a. In line with national and international labour standards, wages should be increased to ensure a decent and dignified standard of living for workers in this sector, which would also improve motivation and work performance.

b. Additional remuneration should be ensured for extra work during peak days—such as during Hindu wedding seasons—in accordance with Labour Act Section 108 and international labour standards.

c. The informal practice of penalising workers for accidental breakage of crockery should be discontinued, as it is inhumane and causes undue psychological pressure.

d. During Ramadan, when work is minimal and workers have no income, government initiatives should provide economic protection through social safety measures, including temporary financial support or essential commodities for one month. Employers should also be required to provide Eid bonuses in accordance with labour law.

e. Compensation, medical treatment, and paid leave should be ensured for workers injured in workplace accidents, as stipulated in labour legislation.

f. Unjust dismissal—often occurring by simply removing workers' names from lists—should be prevented by enforcing proper regulatory oversight and requiring compliance with lawful termination procedures.

g. Skill development training should be provided based on job requirements to enhance workers' professionalism, improve service quality, and support the sector's growth.

6.5.12 Union Digital Centre (UDC) Workers

There are 4,547 Union Digital Centres (UDCs) across Bangladesh's unions, operating with the objective of reducing the digital divide.[109] Each UDC typically employs two entrepreneurs—one man and one woman—reflecting a noteworthy feature of gender-balanced participation. Accordingly, a total of 9,094 entrepreneurs are engaged across 4,547 UDCs.[110] The entrepreneurs are locally selected, work under agreements with the Union Parishads, and provide digital services to citizens. However, there are no established rules regarding fixed working hours or leave entitlements for those employed in this sector.

[109] Md. Osman Gani, *Union Digital Center in Rural Development*, Protidiner Sangbad, 20 June 2016. https://www.protidinersangbad.com/todays-newspaper/editor-choice/8255

[110] Ibid

To ensure decent work and dignity for the entrepreneurs working in UDCs, the Labour Reform Commission proposes the following reforms:

a. The cancellation of existing contracts for entrepreneurs in all 4,578 UDCs and the introduction of necessary measures to fill vacant revenue posts through direct recruitment, pursuant to the Public Administration Ministry's circular No. 05.166.022.00.00.044.1988-1365 (250), dated 24 November 2010.

b. Ensuring that, even if contractual recruitment continues in this sector, all employment conditions adhere to labour law provisions—especially regarding working hours, wages, leave, job security and protection—so that decent work standards are achieved.

c. Establishing a clear competency framework, particularly in information and communication technology, for recruitment into this sector, and expanding facilities to enable entrepreneurs to become effective service providers. Recruitment processes may follow the rules applicable to the 'Data Entry Operator' post under the Computer Personnel Recruitment Rules 2019.

6.6 Occupational Groups

6.6.1 Journalists/Media Workers

In Bangladesh, journalists historically operated under a somewhat distinct regulatory framework. The Newspaper Employees (Conditions of Service) Ordinance 1974 was introduced in response to journalists' demands, ensuring specific benefits and protections for newspaper employees. Wage boards for journalists and newspaper workers operated under this ordinance. In 2006, the ordinance was repealed, and several related provisions were incorporated into the Labour Act.[111] Since then, wage boards for journalists, newspaper officers and employees, and press workers have operated under the Labour Act. However, the Labour Act categorises media employees as "newspaper workers", excluding online and broadcast journalists (radio and television)[112], leaving many media workers outside formal legal protection.

To ensure universal protection, a draft law titled the *Media Workers (Conditions of Service) Act 2017* was prepared, expanding the definition of media employees and incorporating television and electronic media workers. However, the Bill introduced in Parliament diverged significantly from the draft, particularly in defining journalists and media workers.[113] It also failed to include non-traditional or emerging media roles such as part-time, contract-based, event-based or freelance media workers, despite their significant presence. The Bill proposed a 48-hour working week (six working days), unclear provisions for overtime, and its Clause 12 allowed employers to declare "surplus workers" without providing a clear definition. The formation of wage boards was made discretionary rather than mandatory, and no guidelines were provided for salary structures in the absence of a wage board. Similarly, the formation of a future fund has also been left to the discretion of the employers. The proposed regulations do not provide a clear understanding of job security for journalists and media workers, nor of their related benefits and rights, or matters concerning trade unions and collective bargaining. Several existing benefits—including gratuity, certain types of leave, night duty allowance and responsibility allowance—were reduced or removed. No definition or explanation of 'journalist' or 'editor' was included. Everyone, on average, was identified simply as a 'media worker.[114] Ultimately, the Bill was not passed.

Implementation gaps also persist within the existing Labour Act. The Ninth Wage Board Award for newspaper journalists is not fully implemented in most organisations.[115] There is no wage board for television or online journalists. Camera-crew employees lack standardised job titles, resulting in inconsistency and inequality across organisations.

---

[111] Bangladesh Labour Act 2006, Sections 143, 144, 145, 146, 147, 148, Government of the People's Republic of Bangladesh

[112] Bangladesh Labour Act 2006, Section 2(72), Government of the People's Republic of Bangladesh

[113] Azadur Rahman Chandan, 'Why an Employment Law for Journalists Is Necessary (Sangbadikder Chakri-Ain Keno Jaruri)" bdnews24.com October 8, 2024. https://bangla.bdnews24.com/opinion/d2182597a32b

[114] Ibid

[115]

While the Ministry of Labour is responsible for inspection and enforcement in industrial establishments, this oversight does not extend to journalism or media sectors, where the Department of Films and Publications (DFP) under the Ministry of Information serves as the relevant authority, despite the Labour Act having no specific provisions in this respect.

Given this context, the Labour Reform Commission recommends the following measures:

a. Establish either a separate law—modelled on the Newspaper Employees (Conditions of Service) Act 1974—for journalists and workers of all forms of media (electronic and print), or incorporate a distinct chapter within the existing Labour Act.

b. Expand the definition of "newspaper worker" within the Labour Act to "media worker/employee", thereby bringing online, broadcast (radio and television), and other categories of media workers within the legal framework.

c. Make the issuance of appointment letters mandatory for all journalists and media workers in both electronic and print media.

d. Implement definite working-hour regulations and leave entitlements for journalists, including maternity leave for women journalists.

e. Recognise all camera-crew workers as "photojournalists".

f. Require every media organisation to submit monthly salary-payment records to the Department of Inspection for Factories and Establishments (DIFE) to ensure regular wage disbursement.

g. Introduce risk allowances, insurance coverage and pension schemes for all journalists.

h. Strengthen the Journalist Welfare Trust to enable it to provide meaningful support to all journalists.

6.6.2 Fishers and Fisherfolk Workers

Approximately 20 million people in Bangladesh—including 1.4 million women—are directly or indirectly dependent on the fisheries sector, accounting for about 12 per cent of the total population. Nearly 96 per cent of workers in this sector are untrained.[116] Gender-based, age-based and location-based inequalities are prevalent.

Fishers often work under dangerous conditions: marine fishing hazards, exposure to cold, illness risks, chemical contact, and low and irregular income. Many are compelled to take high-interest loans from boat owners or moneylenders, pulling them deeper into poverty.

[116] Annual Report 2023–2024, Ministry of Fisheries and Livestock, Department of Fisheries and Livestock Information (2024)

The destruction of fishing equipment (such as nets and boats) during enforcement drives by authorities further jeopardises livelihoods, causing both immediate and long-term income loss.

The Commission recommends the following measures:

a. Abolish the *jalmahal* (water-body leasing) system and introduce a licensing system that grants genuine fishers the legal right to fish independently.

b. During fishing bans imposed for conservation or breeding seasons, assess the income loss faced by fishers and ensure social protection—such as alternative livelihood opportunities, VGF support, rationing, and inclusion in the universal pension scheme.

c. Implement the 2022 Gazette notification for fishing-trawler fishers.

d. Eliminate the exploitative *dadon* system (which charges 30% interest) through legal measures and ensure exemplary punishment. Expand access to interest-free, short-term government loans so that fishers are no longer forced to depend on *dadon*.

e. Provide all fishers with identity cards and establish a specialised "tracking and monitoring system" to ensure the safety of fishers going to and returning from the sea, enabling distress alerts and communication via the Coast Guard and mobile technology.

f. Develop necessary infrastructure at each landing station and establish ice plants in all relevant areas.

g. Allocate *sagar-shikasti* government land for coastal fisher households to resolve acute housing problems.

h. Ensure that small coastal boat owners are not barred from accessing landing facilities due to licensing complications.

i. Enforce strict prohibitions on illegal sand extraction in fishing zones.

j. Reduce the ban period for hilsa fishing during breeding season from 22 days to 15 days.

k. Formulate legal provisions to ensure compensation—payable through the labour courts—for injury, death or loss of fishing equipment resulting from piracy or illegal sand extraction, under the work-accident provisions of the Labour Act 2006.

l. Ensure compensation through the Department of Fisheries for losses caused by natural disasters, with the Labour Welfare Foundation Fund available as a supplementary source.

m. Prohibit the destruction of livelihood equipment during enforcement drives and ensure accountability for those responsible.

n. Eliminate child labour in fishing, fish-processing and selling by ensuring educational inclusion for all children in fishing communities.

o. Undertake rehabilitation programmes and create alternative livelihood opportunities for fishers affected by shipbreaking activities, industrial encroachment, illegal sand extraction and restricted fishing zones.

6.6.3 Hawkers/Self-Employed Urban Informal Workers

Hundreds of thousands of hawkers operate across major cities in Bangladesh, most of them men.[117] Working on a temporary and self-employed basis, they lack fixed working hours or leave; many work 8–12 hours daily. Institutional recognition is limited, keeping the sector informal despite partial identification by some local authorities. Although many hawkers receive identification cards from local authorities, this is not very common at all. [118] Proposed Hawker Boards are yet to materialise.

Hawkers face frequent threats: extortion, eviction drives and the destruction of goods. Their working environment is hazardous—dust, waste, odour and exposure to the open air pose continuous health risks. They have no access to social protection, healthcare or welfare services. Rehabilitation attempts have historically been poorly implemented.

Recommendations of the Commission:

a. Establish a registration system through local government or competent authorities to provide identity cards and formal recognition of hawkers as workers.

b. Create designated "special hawker commercial zones" to ensure an environment free from social, economic and legal harassment.

c. Prohibit the destruction of livelihood assets during sudden or poorly planned eviction drives and increase awareness among enforcement authorities.

d. Ensure the development of clear rehabilitation plans within a reasonable time frame before any eviction, with active participation and representation of worker groups throughout the planning process.

---

[117] Md. Mazharul Islam, Md. Ali Haidar, Sharif Md. Amirul Islam, and Syed Mehedi Hasan, 'The Life and Livelihood of Hawkers in Chattogram City and Its Impact on Urban Neighbourhoods,' *Journal of Geography and Environment*, 11th Year, March 2021. https://www.researchgate.net/publication/352777310_cattagrama_saharera_hakaradera_jibana_o_jibika_ebam_nagariya_pratibesika_elakaya_tara_prabhaba_Street_vendor%27s_livelihood_and_their_impact_in_the_urban_neighbourhood_A_case_study_in_Chittagong_city

[118] Saidul Islam, 'The Hawker Rehabilitation Initiative in Dhaka South City Has Stalled (Thomke Achhe Dhaka Dokshin City'r Hawker Punorbasan Udyog) ,' *Daily Bhorer Dak*, 8 January 202. https://www.dailybhorerdak.com/news/237933

6.6.4 Market/Shop Employees

According to Bangladesh Bureau of Statistics, 25.41 lakh (2.54 million) wholesale and retail establishments employ about 9.2 million workers, including 203,191 women.[119] According to the Shop Employees Federation, across ten major sectors—including shops, malls, chain stores, departmental stores, retail shops, wholesalers, electrical shops, salons, beauty parlours and pharmacies—more than 6 million employees work nationwide.[120]

Shop employees generally lack appointment letters and in many cases only have nominal identity cards. They work an average of 10–12 hours per day without overtime pay. During festivals or special occasions, working hours increase without regulation. Although the Labour Act mandates 1.5 days of weekly leave, most shop employees receive at most one day of leave, and often none during peak seasons. There is no minimum wage board for this sector, allowing employers to set wages arbitrarily, often below subsistence levels.

Access to hygienic toilets remains inadequate in most workplaces except large malls, with no separate facilities for women in many establishments.

Recommendations:

a. Issue appointment letters specifying all employment conditions to protect workers' rights during and after employment.

b. Establish a minimum-wage board for shop employees and declare a fair minimum wage enabling workers to maintain a life of dignity for themselves and their families.

c. Ensure compliance with legally mandated weekly leave.

d. Provide hygienic toilet facilities at or near all workplaces, with separate toilets for women where necessary.

---

[119] BBS, *Wholesale and Retail Trade Survey Report 2021*, Bangladesh Bureau of Statistics, Statistics and Informatics Division, Ministry of Planning, Government of the People's Republic of Bangladesh, 2022. 2022-09-11-07-01-f7682f00c346db36d7060ad3d8564197.pdf

[120] Human chain demanding Eid bonuses and rationing for over six million shop employees, *Somoy News*, 2 March 2024. https://somoynewsbd.net/%E0%A7%AC%E0%A7%A6-%E0%A6%B2%E0%A6%95%E0%A7%8D%E0%A6%B7%E0%A6%BE%E0%A6%A7%E0%A6%BF%E0%A6%95-%E0%A6%A6%E0%A7%8B%E0%A6%95%E0%A6%BE%E0%A6%A8-%E0%A6%95%E0%A6%B0%E0%A7%8D%E0%A6%AE%E0%A6%9A%E0%A6%BE/

6.6.5 MLSS/Watchman Staff

In 2013, a total of 37,000 office-cum-watchman staff were appointed in government primary schools across Bangladesh.[121] These employees are reportedly required to perform duties inhumanely and without precedent, working both day and night. Since their appointment, they are expected to serve as school office staff during the day and as watchmen at night, effectively maintaining responsibility for 24 hours.[122] The Ministry of Primary and Mass Education's *Guidelines for Recruitment of Office-cum-Watchman Staff in Government Primary Schools through Outsourcing, 2019* do not specify working hours for outsourcing service providers.[123] Despite performing identical roles, there are regional disparities in remuneration. In some upazilas, staff receive BDT 14,450, whereas in others, BDT 16,130. Similarly, festival allowances are granted in some locations but not in others. The office-cum-watchman position is fundamentally an outsourced post. According to outsourcing guidelines, it is not a government salaried position; remuneration is determined solely through service contracts. Staff are paid only for the duration of their contractual engagement. Furthermore, employment must be renewed every three years through a BDT 150 stamp, creating a situation of persistent uncertainty for employees.

Recommendations to address these issues include:

a) Standardising the working hours for office and watchman staff to eight hours per day, with overtime allowances provided for additional hours.

b) Eliminating irregularities in contract renewal by implementing local administrative oversight and including the office-cum-watchman position under the government revenue budget.

c) Revising outsourcing recruitment guidelines to retain only the office or office assistant designation, defining the scope of work explicitly, and discontinuing the combined office-cum-watchman post.

6.6.6 Medical Representatives / Sales and Marketing Staff

Accurate statistics on the workforce in Bangladesh's pharmaceutical sector are not available. Studies indicate that approximately 98% of medical representatives (MRs) are male.[124] While large companies offer permanent appointments, small and medium-sized enterprises rely heavily on

[121] Suspension of the movement of primary school office-cum-watchman staff, Dhaka Times, 24 August 2020. https://www.dhakatimes24.com/2020/08/24/180463

[122] Ibid

[123] Circular issued regarding the salaries of office-cum-watchman staff (Daptari Kam Prohorider Betan Songkranto Poripotro Jari) ," SonaliNews, 17 February 2022. https://www.sonalinews.com/education/news/167196

[124] Md. Eousuf Efti, Medical representative turnover intention: A growing concern in Bangladesh's pharmaceuticals industry, The Financial Express, 6 July 2023. https://thefinancialexpress.com.bd/views/reviews/medical-representative-turnover-intention-a-growing-concern-in-bangladeshs-pharmaceuticals-industry

temporary or contract-based employment. The absence of defined working hours often results in 16–17 hour workdays, with weekly and statutory holidays frequently not observed, particularly for contract staff.

Although performance incentives exist, the pressure to meet targets can require long waiting periods at hospitals, clinics, and doctors' chambers, as well as photographing patient prescriptions to report to superiors, which can create humiliating experiences.

The job security of medical representatives (MRs) is uncertain; failure to meet targets may result in departmental transfer or loss of employment. On the other hand, despite concerns over job security, their freedom to change jobs is also limited, as there is a prevailing practice of retaining original academic certificates and collecting blank cheques at the beginning of employment.

Recommendations include:

a) Inclusion under labour law to ensure job security, protection of rights, and welfare, including regulated working hours, overtime, leave, termination, social protection, and compensation.

b) Prioritisation in professional registration processes and inclusion in a proposed national database of all medical representatives, sales, and marketing staff in Bangladesh.

c) Guarantee of permanent employment irrespective of company size, replacing temporary, contract-based, or performance-target-based hiring. Employment conditions must be clearly stated at the time of recruitment, with prohibition of unrealistic, arbitrary, or coercive sales targets, and responsibility for credit sales assumed by the company.

d) Inclusion of medical representatives within the jurisdiction of the Minimum Wage Board, with announced entitlements, wages, and benefits in line with national and international standards, including provident fund and gratuity policies.

e) Designation of any coercive practices, such as mandatory submission of educational certificates, blank cheques, or punitive measures for early resignation, as forced labour, with strict sanctions for violations.

f) Prohibition of coercion into unethical, humiliating, or socially degrading activities, particularly the collection of patient prescription images, with companies held accountable.

g) Provision of adequate travel allowances or transport facilities by the company to enable professional duties.

h) Recognition of road accidents during professional duties as workplace accidents, with compensation ensured under the law.

6.7 Workers under Special Employment Arrangements

6.7.1 Outsourced Workers

Outsourced workers face insecure employment, deprivation of fair wages, violations of labour rights, and lack of social protection. While over six hundred thousand workers are employed under outsourcing arrangements in government institutions, the exact number in the private sector is unknown. Although outsourcing guidelines (2008, 2018, 2025) and the amended Labour Act (2013) exist, they are insufficient to protect workers' rights. Most outsourced employees lack formal appointment letters, identity cards, or service books, denying them legal protection and leaving them vulnerable to termination without notice. Female workers are also deprived of maternity leave and other statutory benefits.

Despite wage structures outlined in outsourcing guidelines, workers often do not receive the stipulated rates. Contractors frequently deduct significant portions of wages, and employees are often unaware of their total entitled pay. Significant wage disparities exist between permanent and outsourced staff in the same positions.

Outsourced workers also face various obstacles in joining labour organisations. If they become associated with such organisations, they are often threatened with dismissal, which narrows their avenues for protecting their rights. At present, there is no trade union for outsourced workers, placing them in an even more vulnerable position.

Considering the overall condition of outsourced workers, the Labour Reform Commission believes that the effective implementation of policies and laws is essential to ensure their rights, fair wages, safe working conditions, right to organise, and social protection. In this regard, the Commission recommends the following measures:

a) Immediate cessation of outsourcing recruitment for permanent roles in government, semi-government, autonomous, corporate, and private institutions, with updates to permanent staffing structures in compliance with laws and regulations.

b) Direct recruitment in government, semi-government, and autonomous institutions, ending contractor-based hiring. Employees with 5–10 years of experience or more should have their rights and protections guaranteed by the principal employer under labour law.

c) Ensuring that outsourced workers are not terminated without cause, that tenders are not arbitrarily reopened, and that previously dismissed workers are reinstated. Skills and experience should be considered for permanent recruitment after project completion.

d) Recognition of the right to organise, allowing outsourced workers to participate in the mainstream union of the institution, raise individual and collective complaints on work environment, safety, and discriminatory practices, and exercise voting rights in CBAs.

6.7.2 Ride-Sharing / Gig / Platform Economy Workers

The ride-sharing sector has become significant in Bangladesh's urban transport system. Workers in this sector face a lack of legal recognition, absence of social security and fair wages, safety risks, and health challenges, making their livelihoods uncertain and precarious. Organisational opportunities are limited, and no registered trade unions exist. Most drivers have no fixed working hours or leave arrangements, and prolonged driving causes musculoskeletal issues, stress, and fatigue. Ride-sharing companies impose commissions on earnings without clear standards, sometimes as high as 20–25% daily.

Recommendations include:

a) Recognition of ride-sharing drivers as workers and establishment of a regulatory body to ensure labour rights, fair wages, and safe working conditions under Bangladesh Labour Law, including oversight of company compliance.

b) Consideration of multinational companies employing ride-sharing drivers as responsible for workers in their supply chain, ensuring fair wages, safe working conditions, and compliance with international standards.

c) Establishment of a national special wage framework to guarantee fair remuneration, with company commission rates regulated to allow drivers to earn income commensurate with effort.

d) Assurance of transparency in platform operations and equitable sharing of earnings, including removal of daily platform fees and trip charges imposed on drivers, preventing unexpected financial burdens.

e) Ensuring fairness and transparency in the suspension or termination of accounts of workers on ride-sharing platforms. The following procedures/steps should be followed:

I. Before closing a driver's account, mandatory notice must be provided in accordance with labour law, and the validity of any complaint against the driver must be verified.

II. Decisions should be made through a defined investigation process rather than immediately suspending a driver from service based solely on passenger complaints.

III. Compensation must be ensured for drivers in cases of unjustified or unreasonable temporary suspension.

f) **Measures to reduce safety risks and ensure job security for ride-sharing workers:**

I. Drivers should not be held responsible for passenger misconduct, unethical, or illegal activities. Clear safety measures must be implemented to protect both drivers and passengers.

II. A comprehensive database should be maintained containing detailed information on professional drivers as well as vehicle owners for app-based rides.

III. A 24/7 call centre or support service should be established for both passengers and drivers to ensure rapid resolution of any issues.

6.7.3 Home-Based Workers

Recommendations include:

a) Recognition of home-based workers and inclusion under labour laws and policies to ensure protection.

b) Conducting a national survey to determine the number of home-based workers, the nature of their work, and documenting them through official registration.

c) Establishment of a living-wage minimum to protect against wage exploitation, with contractors and employers obliged to provide fair remuneration and security.

d) Education of home-based workers on labour rights, collective bargaining, and unionisation, providing training to enhance negotiation capacity and ensure fair pay and work safety.

e) Implementation of government-led skill development training programmes, provision of low-interest loans to self-employed home-based workers, and support to establish them as small-scale entrepreneurs.

7. Special Proposals

7.1 Labour Force Surveys, Research, and Education

a) Regular surveys on labour issues should be conducted under the Bangladesh Bureau of Statistics to address gaps in necessary and reliable labour statistics, following the latest ILO standards, with the aim of creating a transparent, accountable, and inclusive labour market.

b) National-level surveys on workforce, child labour, and labour-related issues conducted by the Bangladesh Bureau of Statistics should be coordinated with the proposed "Research, Education, and Training" sub-division under the Ministry of Labour and Employment, with trade unions included at every stage of the survey process, particularly during planning.

c) Regular research programmes should be conducted on labour market dynamics, employment, workers' rights, industrial relations, and other labour-related issues. Such research should be conducted jointly under the Ministry of Labour and Employment, involving employers, trade unions, government, and development partners, ensuring that findings contribute effectively to national policy-making.

d) To foster a society sensitive to workers and their rights, primary and secondary curricula should include topics on workers' rights and international labour standards. At the university level, honours and master's programmes on labour and industrial relations should be introduced.

e) Basic training programmes for government officials involved in field-level implementation of policies should include courses on workers' rights, national and international labour standards, and industrial relations.

7.2 Budget Allocation

a) The two main ministries responsible for the labour sector in Bangladesh – the Ministry of Labour and Employment and the Ministry of Expatriates' Welfare and Overseas Employment – currently do not receive a dedicated portion of the national budget. Yet, the people under these ministries constitute the core workforce and economic backbone of the country both domestically and abroad. The labour sector receives insufficient attention and priority in national budget allocations, and participation of these ministries in annual budget allocations related to workers' interests remains limited. There is a need to increase allocations in the national budget for modernisation of institutions under these ministries, capacity building, and ensuring workers' welfare and decent working conditions. Specific measures include establishing rationing systems for workers, providing housing for private-sector workers, maternity allowances for female workers in informal sectors, implementation of a national pension scheme, financial support for workers and their families, training for skill development, and dedicated budget allocations for health and medical care.

b) Appropriate budgetary allocations should be made from government funds to plan and implement social protection and labour welfare programmes, including insurance, unemployment benefits, retirement benefits, and long-term compensation for accident-related disabilities.

7.3 White Paper Preparation

a) A white paper should be published detailing government actions, investigations, judicial outcomes, compensation, and utilisation of domestic and international financial aid following major workplace accidents, including the Rana Plaza collapse and the Tajrin Fashion fire.

b) A white paper should be issued on the utilisation of the Labour Welfare Foundation Fund.

c) White papers should be published documenting government incentives or special assistance provided during the COVID-19 pandemic and at other times of crisis.

Appendix

Appendix 1.3.1: List of Technical Committee Members

Research and Reporting Committee

- Professor Dr. Zakir Hossain, Honourable Commission Member
- Mostafiz Ahmed, Jagannath University
- Dr. Afroza Akhter, Researcher
- Md. Aurangzeb Akand, Mawlana Bhashani Science and Technology University
- Dr. Md. Shayem Ali Khan, Researcher
- Dr. Ayesha Yasmin, Research Associate

Main Committees

a. Committee on Legal and Policy Framework

- Advocate A. K. M. Nasim, Honourable Commission Member
- Barrister Nihad Kabir, Honourable Commission Member
- Taslima Akhter, Honourable Commission Member
- A. N. M. Saif Uddin, Honourable Commission Member
- Advocate Barakat Ali, BLAST
- Advocate Nazrul Islam, Solidarity Center
- Md. Mashum Billah, Legal Officer, Department of Inspection for Factories and Establishments

b. Committee on Institutional Structure and Governance of Labour

- Dr. Mahfuzul Haque, Honourable Commission Member
- A. N. M. Saif Uddin, Honourable Commission Member
- Shakil Akhter Chowdhury, Honourable Commission Member
- Md. Shafiqul Rahman, Department of Labour
- Rezuanul Haque Azom, Research Associate

c. Committee on Labour Discontent, Justice and Grievance Redress

- Barrister Nihad Kabir, Honourable Commission Member
- Advocate A. K. M. Nasim, Honourable Commission Member

- Tapan Dutta, Honourable Commission Member
- Taslima Akhter, Honourable Commission Member
- Advocate Atikur Rahman, Sramik Kallyan Federation
- Imtiaz Ahmed Sajal, Dhaka International University
- Advocate Toufiq Imtiaz, BILS

d. Committee on Industrial Relations (Collective Bargaining & Social Dialogue)

- Kamran T. Rahman, Honourable Commission Member
- Chowdhury Ashikul Alam, Honourable Commission Member
- A. N. M. Saif Uddin, Honourable Commission Member
- Ahsan Habib Bulbul, Socialist Labour Front
- Khandekar Shafin Habib Shan, Solidarity Center
- Fahmina Mishu Kashem, National Workers Alliance
- Laskar Md. Taslim, Sramik Kallyan Federation

e. Committee on Social Protection and Welfare of Labour

- Rajequzzaman Ratan, Honourable Commission Member
- Fazle Shamim Ehsan, Honourable Commission Member
- Sekandar Ali Mina, Safety and Rights Society
- Md. Mosfikur Rahman, Researcher
- Ariful Islam, Honourable Commission Member
- Mostafa Al Hossain Akil, Student Representative, Labour Reform Commission
- Md. Sayeduzzaman Mithu, BILS
- Mehedi Imam, Researcher

Thematic Technical Committees

a. Right to Work, Opportunities, Security, and Inclusion

- Dr. Ananya Raihan, Honourable Commission Member
- Syed Nasim Manjur, Honourable Commission Member

- Dr. Wasel Bin Shadat, Researcher
- Ariful Islam, Honourable Commission Member
- Mostafa Al Hossain Akil, Student Representative, Labour Reform Commission

b. Wages and Fair Share

- Dr. Ananya Raihan, Honourable Commission Member
- Fazle Shamim Ehsan, Honourable Commission Member
- Sadiq Mahmood, Research Associate
- Shajib Dey, BILS

c. Safe and Healthy Work Environment

- Faruk Ahmad, Honourable Commission Member
- Abul Kalam Azad, Bangladesh Trade Union Centre
- Professor Dr. Hasanath M. Alamgir, South East University
- A. K. M. Masum Ul Alam, Bangladesh University of Health Sciences
- Dr. Mohammad Hayatun Nabi, North South University
- Khandekar Abdus Salam, BILS
- Md. Omar Faruk, Aldi C. R. Support Asia
- Syed Zerif Uddin Ahmed, Research Associate
- Sifat Chowdhury, Bangladesh Institute of Labour Studies

d. Social Protection and Welfare

- The Social Protection and Welfare Committee is considered the same team as the Committee on Social Protection and Welfare of Labour

e. Right to Organisation, Participation, Representation, and Collective Bargaining

- This committee is considered the same team as the Committee on Industrial Relations (Collective Bargaining and Social Dialogue)

f. Industrial Discontent, Dispute Resolution, and Fair Justice

- This committee is considered the same team as the Committee on Industrial Relations (Collective Bargaining and Social Dialogue)

g. Equality, Non-Discrimination, Women, and Special Groups

- Kohinoor Mahmud, Director, BILS
- Taslima Akhter, Honourable Commission Member
- Barrister Nihad Kabir, Honourable Commission Member
- Sanjida Sultana, Additional Executive Director, Working Women
- Adiba Afroze, Researcher, Bangladesh Garments Workers Solidarity
- Mousumi Nishat Shimul, Program Officer, BILS
- Taqia Chowdhury, Assistant Officer – Advocacy, BILS
- Trishia Nashtaran, Organiser and Editor, Feminist Alliance of Bangladesh (FAB)

h. Child Labour, Adolescent Workers, and Forced Labour

- Rajekuzzaman Ratan, Honourable Commission Member
- Asif Ayub, Joint Secretary, BEF
- Afzal Kabir Khan, Educo
- Habibur Rahman, BEF

Special Thematic Technical Committee:

Migration

- Shakil Akhter Chowdhury, Honourable Commission Member
- Asif Ayub, BEF
- Mazharul Islam, ILO
- Sanjida Khoshnur, Research Associate

Team for Drafting the Introduction to the Report

- Dr. Hasan Ashraf, Jahangirnagar University
- Advocate Nazrul Islam
- Taslima Akhter, Honourable Commission Member

Secretarial Support Team

- Md. Mozammel Haq, Joint Secretary, Ministry of Labour and Employment
- Shafiqul Islam, Assistant Director, Department of Labour

- Md. Mashum Billah, Legal Officer, Department of Inspection for Factories and Establishments
- Noor Jahan Amina Moon, Executive Assistant, BILS
- Farhana Yasmin, Typist, Department of Inspection for Factories and Establishments
- Abdur Rahman, Office Assistant, Department of Labour

Overall Support – BILS Team

- Kohinoor Mahmud, Director
- Najma Yasmin, Director
- M. A. Mazid, Deputy Director
- Md. Yusuf Al Mamun, Deputy Director
- Md. Manirul Islam, Deputy Director
- Titu Mizan, Senior Officer, Coordination, IT, and Maintenance
- Chowdhury Borhan Uddin, Senior Program Officer
- Monirul Kabir, Senior Program Officer
- Md. Sayeduzzaman Mithu, Senior Program Officer
- Shajib Dey, Senior Program Officer
- Shamim Ahmed, Research Officer
- Sabrina Sharmin Seba, Officer, Monitoring and Documentation
- Md. Humayun Kabir, Senior Accounts Officer
- Md. Al Mamun-Siddiq, Senior Accounts Officer
- Martha Himani Deuri, Accounts Officer
- Mousumi Nishat Shimul, Information Officer
- Advocate Tawfiq Imtiaz, Officer – Advocacy
- Taqia Chowdhury, Assistant Officer – Advocacy
- Md. Al-Mamun, Librarian
- Samia Khan, Intern
- Halim Fakir Sayem, Driver
- Tipu Shikdar, Driver
- Goni Mia, Office Assistant
- Sathi Begum, Office Assistant

Appendix 1.3.2: List of Organisations Participating in the Meeting

List of Organisations Participating in Meetings with Workers' Organisations

1. Jatiyatabadi Shromik Dal (Nationalist Workers' Party)
2. Jatiyo Shromik Jot (National Workers' Alliance)
3. Bangladesh Labour Federation
4. Bangladesh Shromik Kallyan Federation (Bangladesh Workers' Welfare Federation)
5. Bangladesh Garments and Industrial Worker Federation
6. Industrial Bangladesh Council
7. Garments Shromik Mukti Andolon (Garments Workers' Liberation Movement)
8. Garments Shromik Songhoti & Nau Poribohon Shromik Kendra (Garments Workers' Solidarity & Maritime Transport Workers' Centre)
9. Jatiyo Sweaters Garments Workers Federation (National Sweaters Garments Workers Federation)
10. Readymade Garments Workers Federation
11. Bangladesh National Labour Federation
12. Bangladesh Garments Shromik Songhoti (Bangladesh Garments Workers Solidarity)
13. Garments Textile Shromik Federation
14. Biplobi Shromik Songhoti (Revolutionary Workers' Solidarity)
15. Garments Shromik Kormochari Oikko Parishad (Garments Workers Employees Unity Council)
16. Rastro Songskar Andolon (State Reform Movement)
17. Jatiyo Garments Shromik Federation (National Garments Workers Federation)
18. Bangladesh Shromik Adhikar Parishad (Bangladesh Workers Rights Council)
19. Jatiyo Garments Shromik Jot (National Garments Workers Alliance)
20. Bangladesh Songjukto Garments Shromik Federation (Bangladesh United Garments Workers Federation)
21. Garments Shromik Andolon (Garments Workers Movement)
22. Green Bangla Garments Shromik Federation

23. Jatiyo Nirman Shromik Jot Bangladesh (National Construction Workers Alliance)
24. Garments Shromik Trade Union Kendra (Garments Workers Trade Union Centre)
25. Samajtantrik Khetmojur O Krishok Front (Socialist Agricultural Labour & Farmers' Front)
26. Bangladesh Khetmojur O Songothon (Bangladesh Agricultural Workers' Organisation)
27. Jatiyatabadi Krishok Dal (Nationalist Farmers' Party)
28. Jatiyo Krishok Jot (National Farmers' Alliance)
29. Bangladesh Krishok Mojur Songhoti (Bangladesh Farmers & Workers Solidarity)
30. Bangladesh Khetmojur Samiti (Bangladesh Agricultural Labour Committee)
31. Bangladesh Krishok Samiti (Bangladesh Farmers' Association)
32. Bangladesh Agricultural Farm Labour Federation
33. Shahjalal Fertilizer Shromik Kormochari Union
34. Bangladesh Krishok Khetmojur Samiti
35. Nari Trade Union Songothon (Women's Trade Union Organisation)
36. Shromik Adhikar Oikko Parishad (Workers' Rights Unity Council)
37. Bangladesh Free Trade Congress
38. Bangladesh Jatiyatabadi Shromik Dal
39. Garments Workers Trust
40. Bangladesh Trade Union Confederation
41. Samajtantrik Shromik Front (Socialist Workers Front)
42. Bangladesh Shromik Federation
43. Jatiyo Trinamul Shromik Federation (National Grassroots Workers Federation)
44. Bangladesh Shromik Kormochari Federation
45. Bangladesh Labour Congress
46. Bangladesh Songjukto Shromik Federation (Bangladesh United Workers Federation)
47. Bangladesh National Labour Federation
48. Bangladesh Jatiyo Shromik Forum
49. Jatiyo Samajtantrik Shromik Jot (National Socialist Workers' Alliance)

50. National Workers Unit Centre
51. Shromik Dal, Rajshahi
52. Rajshahi Zila Shromik Dal Railway
53. Shromik Kallyan Federation (Workers Welfare Federation)
54. Barishal Bus Malik Samiti (Barishal Bus Owners' Association)
55. Bangladesh Chemical Workers Federation
56. Biplobi Garments Shromik Songhoti (Revolutionary Garments Workers' Solidarity)
57. Krishi Bank Employees Federation
58. Bangladesh Bank Employees Federation
59. Uttara Bank Shromik Kormochari Federation
60. Rupali Bank Kormochari Songh
61. Janata Bank Employees Federation
62. Bangladesh House Building Finance Corporation Employees Union
63. Bangladesh Bank Jatiyatabadi Kormochari Doptor
64. Bangladesh Bank Kormochari Samiti
65. Agrani Bank Kormochari Samiti
66. Sonali Bank C.B.A.
67. Bangladesh Trade Union Council
68. Bangladesh Autorickshaw Light Vehicle Federation
69. Dhaka Zila Taxi, Taxicar, Auto Tempo, Autorickshaw Chalok Shromik Union
70. Bangladesh Auto-Rickshaw Light Vehicle Transport Workers Federation
71. National Co-ordination Committee for Workers Education
72. Shromik Kormochari Oikko Parishad (Workers Employees Unity Council)
73. Bangladesh Cha Shromik Union (Tea Workers Union)
74. Pathor Shromik Union (Stone Workers Union)
75. Bangladesh T.E Staff Association (Tea Estate Staff Association)
76. Battery Chalito Autorickshaw Shromik Union

77. K.G.G. Employees Union
78. Launch Labour Association
79. Bangladesh Lighterage Shromik Union
80. Patkal Shromik Dal (Jute Mill Workers' Party)
81. Saw Mill Union, Khulna
82. Bank Federation Khulna
83. Easybike Union, Barishal
84. Rickshaw, Truck Shromik Union, Barishal
85. Barishal Labour Employees Union
86. Bangladesh Cha Shromik Federation (Bangladesh Tea Workers Federation)
87. Bangladesh Shromik Kormochari Federation
88. Barishal Bus Shromik Union
89. BRTC Shromik Kormochari Union, Barishal
90. Pat Shromik Union Barishal
91. Uzirpur Upazila Jela Shromik Union
92. Rangamati Zila Shromik Dal
93. Pahari Shromik Kallyan Forum (Hill Workers Welfare Forum)
94. Shromik Dal Bandarban
95. Cox's Bazar BASAD
96. Shromik Dal Rangamati
97. Samajtantrik Khetmojur O Krishok Front
98. Sylhet Gas Field Kormochari Union
99. Jatiyo Bidyut Shromik Kormochari Union (National Electricity Workers' Union)
100. Bangladesh Garments & Sweater Shromik TUC
101. Readymade Garments Workers Federation
102. Biplobi Shromik Songhoti (Revolutionary Workers' Solidarity)
103. Central Women's Committee – BGIDWF

104. Rastro Songskar Shromik Andolon (State Reform Workers' Movement)
105. NGIDWF
106. Bangladesh Jatiyo Shromik Federation

List of Organisations Participating in Meetings with Employers' Organisations

1. Bangladesh Employers Federation
2. Nawabganj Bazar Byaboshayi Samiti, Rangpur (Nawabganj Market Traders' Association, Rangpur)
3. Bangladesh Ship Breakers and Resalers Association
4. Rangpur Motor Malik Samiti (Rangpur District Vehicle Owners' Association)
5. Chittagong Chamber of Commerce
6. Rangpur Zila Truck Malik Samiti (Rangpur District Truck Owners' Association)
7. Bangladesh Dokan Malik Samiti (Bangladesh Shop Owners' Association)
8. Rangpur Zila Restora Malik Samiti (Rangpur District Restaurant Owners' Association)
9. BGMEA (Bangladesh Garment Manufacturers & Exporters Association)
10. Clinic Diagnostic Owners Association, Rangpur
11. BKMEA (Bangladesh Knitwear Manufacturers & Exporters Association)
12. Zila It Bhata Malik Samiti, Rangpur (District Brick Kiln Owners' Association, Rangpur)
13. Battery Chalito Rickshaw Malik Samiti, Rangpur
14. Bakery Malik Samiti, Rajshahi
15. Rajshahi Steel and Engineering Malik Samiti
16. Rajshahi Mobile Phone Byaboshayi Samiti (Rajshahi Mobile Phone Traders' Association)
17. Baladeshi Cha Songshad (Baladeshi Tea Council)
18. Federation of Bangladesh Chambers of Commerce and Industries
19. Barishal-Patuakhali Bus Malik Samiti (Bus Owners' Association)
20. Barishal Matsya Aratdar Association (Fish Traders' Association)
21. Bangladesh Freelancer Development Society

22. Women Chamber, Barishal
23. British Bangladesh Chamber of Commerce
24. BSCIC Malik Samiti, Sylhet (Bangladesh Small & Cottage Industries Corporation Owners' Association, Sylhet)
25. Sylhet Chamber of Commerce & Industries
26. Bangladesh Sweets Manufacturing Association
27. Sylhet Bricks Owner Society

List of Organisations Participating in Meetings with Human Rights Organisations

1. Oxfam
2. Bangladesh Business and Disability Network
3. Practical Action
4. Jatiyo Trinamul Probondhi Songstha (National Grassroots Disabled Organisation)
5. Asia Floor Wage Alliance Bangladesh
6. Women with Disabilities Development Foundation
7. Bangladesh Nari Shromik Kendra (Bangladesh Women Workers' Centre)
8. National Council for Disabled Women
9. Domestic Garments Workers Federation
10. Jatiyo Probondhi Foundation (National Foundation for the Disabled)
11. AFWA Jot
12. CRP (Centre for the Rehabilitation of the Paralyzed)
13. Chittagong Metropolitan Hospital
14. Rana Plaza Trust
15. Chittagong Zila Nari Songhoti (Chittagong District Women Solidarity)
16. Médecins Sans Frontières
17. Young Power in Social Action
18. Gonoshasthya Kendra (Centre for Public Health)

19. Protyoy Social Foundation
20. OSH Foundation
21. Dhaka Community Hospital
22. Bangladesh Banks Employees Federation
23. Jatiyo Adibashi Parishad (National Indigenous Council)
24. Human Rights & Environment Andolon Bangladesh (Human Rights & Environmental Movement Bangladesh)
25. RDRS
26. Rupsha
27. Centre for Resource Studies
28. Khulna Mukti Seba Songstha (Khulna Liberation Service Organisation)
29. Advocacy of Employment Project
30. Occupational Safety Board of Bangladesh
31. Vision Spring
32. Khudro O Majhami Shilpo Foundation (Small & Medium Industries Foundation)
33. Bangladesh Institute of Planners
34. Public Service International
35. Safety and Rights Society
36. Union Network International
37. Agni Foundation
38. USEP
39. Educo
40. Reliant Women Development Organisation (RWDO)
41. Kormojibi Nari (Working Women)
42. Bangladesh Legal Aid and Services Trust (BLAST)
43. World Vision International
44. Shapla (NGO), Rajshahi

45. Khiang Adibashi Songstha (Khiang Indigenous Organisation)
46. Parbotyo Chattagram Pahari Chhatro Parishad (Hill Students' Council, Chattogram)
47. Adibashi Forum (Indigenous Forum)
48. Domestic Workers' Rights Network Bangladesh
49. National Domestic Women Workers' Union
50. Leather Development Forum
51. Breaking the Silence

List of Organisations Participating in Meetings with Professional Organisations

1. Bangladesh Horizon Oikko Parishad
2. Hawkers Federation
3. Sroad Poribohon Songskar Jatiyo Committee (National Committee for Road Transport Reform)
4. Road Cross Hawkers
5. Home-Based Workers Rights Network – Bangladesh
6. Chinnamul Hawkers Samiti (Marginalised Hawkers' Association)
7. Sonali Bank Employees Association
8. Bangladesh Garments O Shilpo Shromik Oikko Parishad (Bangladesh Garments & Industrial Workers' Unity Council)
9. Bangladesh FMCG HR Society
10. BGSSF
11. App-Based Transport Union
12. Masterroll Kormochari Oikko Parishad
13. Bangladesh Freelancer Development Society
14. Vramoman Hawkers
15. Protntotto Adhidoptor Masterroll Doinik Shromik (Directorate of Archaeology Masterroll Daily Workers)
16. Shromik Dal (Workers' Party)

17. Lighthouse, Rajshahi
18. A.B. Shromik Party
19. Mohila Parishad, Rajshahi
20. Bangabandhu Avenues' Songram Parishad (Bangabandhu Avenue Struggle Council)
21. Kuli Mojur Shromik Union, Rangpur
22. Doptori Kam Prohori (Clerical and Guard Staff Union)
23. Zila Bandhan Probondhi Songstha (District Disabled Organisation)
24. Bangladesh Poribohon Shromik Union (Bangladesh Transport Workers' Union)
25. Diner Alo Hijra Songh
26. Rickshaw Van Chalok Union
27. Ladies Organisation for Social Welfare
28. Rajshahi Chini Kol (Rajshahi Sugar Mill)
29. Rangamati Tour Operator Association
30. Easybike Shromik Federation
31. Bangladesh Khetmojur O Krishok Songothon
32. Dhaka University Journalists' Association
33. Bangladesh Sroad Poribohon Shromik Federation
34. Young Broadcast Journalist Unity
35. Dhaka Ride-Sharing Drivers Union
36. TV Camera Journalist Association
37. Bangladesh Outsourcing Kormochari Kallyan Parishad
38. Dhaka Sub-Editor Council
39. Doptori Kam Prohori
40. Labour Rights Journalist Forum
41. Sarkari Kormochari Samanway Parishad (Government Employees' Coordination Council)
42. Broadcast Journalist Center
43. Beauty Parlor Shromik Union

44. Dhaka Union of Journalists
45. Uttara Bank Kormochari Kallyan Samiti
46. Bangladesh Hawkers Songram Parishad
47. Bangladesh Gig Worker Association

Organisations Participating in Meetings with Labour-Related and Government Institutions

1. Department of Labour
2. Ministry of Labour and Employment
3. Factories & Establishments Inspection Department
4. BSCIC District Office, Rangpur
5. Labour Welfare Centre
6. Industrial Police
7. Industrial Relations Institute
8. National Skills Development Authority
9. Chattogram Port Authority

Organisations Participating in Meetings with Various International and National Development Partners

1. FNV
2. 3F
3. ILO (International Labour Organisation)
4. GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit)
5. ActionAid
6. BRAC
7. ETI (Ethical Trading Initiative)
8. USAID (United States Agency for International Development)
9. RISE

10. US Embassy
11. Danish Embassy
12. Fair Ware Foundation
13. Care Bangladesh
14. FES (Friedrich-Ebert-Stiftung)
15. WSUP (Water & Sanitation for the Urban Poor)
16. WARBE
17. OXFAM
18. European Union

Experts and Individuals Attending Various Meetings

1. Representatives of Labour Court Bar Association
2. Rashed Al Mahmud Titumir
3. Labour Law Reform Committee (Members)
4. Khondokar Golam Moazzem
5. M.M. Akash
6. Yanatul Islam
7. Hamida Hossain
8. Anu Mohammed
9. Md. Rizwanul Islam
10. Shaheen Anam
11. Moshahida Sultana

Appendix 1.3.3: List of Individuals and Organisations Submitting Petitions and Written Opinions

Worker Organisations that Submitted Petitions/Recommendations to the Commission

1. Bangladesh Workers Employees Federation
2. Garments Workers Council
3. Workers and Labour Organisations of the Tannery Industry
4. Dhaka District Road Transport Women Drivers Workers Union
5. Bangladesh Agricultural Farm Workers Federation
6. Dock Nationalist Workers
7. Scavengers and Workers Union
8. Meghna Petroleum Employees Union
9. Bangladesh Textile Garments Workers Federation
10. Bangladesh Workers Rights Council
11. North Chattola Coastal Fisheries Welfare Federation
12. Bangladesh Workers Employees Federation
13. Community Center and Decorators
14. Beauty Parlor Workers
15. Chattogram Light Motor Vehicle Drivers-Workers Union
16. Green Bangla Garments Workers Federation
17. Chattogram Metropolitan Construction Workers Group
18. Bangladesh Nationalist Workers Party, Khulna
19. Bangladesh Labour Federation
20. Combined Garments Workers Federation
21. Trade Union Platform for Migrant Workers
22. Bangladesh National Electricity Workers Employees Union
23. Road Transport Owners-Workers Organisation
24. Workers Employees Unity Council, Khulna

25. Bangladesh Trade Union Centre (TUC), Chattogram
26. Khulna Motor Workers Union
27. Bangladesh National Labour Federation
28. Bangladesh Tourism and Hotels Workers Employees Federation
29. Bangladesh Trade Union Centre, Chattogram
30. Chattogram WASA Nationalist Workers Employees Group
31. Central Slate Workers Union
32. Bangladesh Workers Welfare Federation
33. Bangladesh Telecommunications Workers Employees Union
34. North Khulna Building Construction Workers Union
35. National Home-Based Women Workers Union
36. Socialist Workers Front
37. Building Construction Workers Union Bangladesh
38. Bangladesh Trade Union Centre, Chattogram
39. Moulvibazar Fishermen Union
40. Bangladesh Tea Workers Union
41. Bangladesh Labour Federation, Khulna
42. Bangladesh Maritime Workers Federation
43. Greater Barishal Rickshaw-Van Workers Union
44. Workers Employees Struggle Council
45. Socialist Workers Front, Moulvibazar
46. Bangladesh Railway Workers Union
47. Bangladesh Tea Workers Federation
48. Rangpur District Hotel-Restaurant Workers Union
49. International Trade Union Confederation
50. Bangladesh Trade Union Centre, Barishal
51. Bangladesh Auto-Rickshaw-Light Vehicle Transport Workers Federation

52. Taxi, Auto-Tempo, Auto-Rickshaw Drivers Union, Dhaka
53. Alliance of Trade Unions
54. Bangladesh Trade Union Confederation
55. Socialist Tenant and Farmers Front
56. Panchagarh District Truck, Tractor, Tank Lorry and Covered Van Workers Union
57. Sonargaon Hotel Workers and Employees Union
58. Tannery Workers Union
59. Dhaka Metropolitan CNG Auto-Rickshaw Drivers Unity Council
60. Popular Pharmaceuticals Ltd. Workers Employees Union
61. Uttara Bank Limited Employees Union
62. Dock Port Workers Employees Coordination Council
63. Bangladesh Trade Union Centre
64. Tannery Workers Union
65. National Artisan and Industrial Workers Federation
66. Bogura District Nationalist Newspaper Hawkers Union
67. 100 TSC Member Contingency
68. Bangladesh Public Works Employees Union, Water Development Board Bogura
69. Trade Union Centre (TUC), Bogura
70. Bogura Footwear Workers Union, Bogura
71. Bangladesh Banks Employees Federation
72. Bangladesh Workers Rights Council
73. Bogura District Nationalist Hotel Workers Union
74. Khulna Handling Workers Union
75. Tea Workers Union, Moulvibazar
76. Independence Outsourcing Employees Welfare Council
77. Rural Electrification Workers Employees Union
78. Daulatpur Police Station Building Construction Workers Union

79. Green Bangla Garments Workers Federation
80. Workers Employees Unity Council (Scope), Sylhet District
81. Socialist Workers Front (Sylhet District Branch)

Professional Organisations that Submitted Petitions/Recommendations to the Commission

1. Outsourced Employees of Bangladesh Post Office
2. Bangladesh Union Digital Center Directors Welfare Association
3. Employees Engaged in Dhaka WASA Outsourcing
4. Dhaka Ride-Sharing Drivers Union
5. G.C.B. Chattogram Port Lashing and Lashing Workers
6. Bangladesh Government Employees Coordination Council
7. Rickshaw, Battery Rickshaw-Van, and Easybike Struggle Council
8. Bangladesh Harijan Unity Council, Moulvibazar
9. Bangladesh Nationalist Railway Workers and Employees Party
10. Milonpur Majhipara Fishermen Cooperative Ltd., Rangpur (Milonpur Majhipara Matsyojibi Samobay Samiti Ltd)
11. Primary Officers' Job Nationalisation Demand Coordination Council
12. Bangladesh Lighterage Workers Union, Khulna
13. Sales & Marketing Workers Employees Struggle Council
14. Sonali Bank Employees Association
15. Bangladesh Pharmaceuticals Representatives Association
16. TV Camera Journalists
17. Home-Based Workers Rights Network Bangladesh
18. Bangladesh Non-Divisional Postal Employees Council
19. Jalalabad Gas Transmission & Distribution System Ltd.
20. Sales & Marketing Workers Employees Struggle Council
21. Rural Electrification Workers Employees Struggle Council

22. Car, Micro, Ambulance Drivers Welfare Sub-Committee
23. Bangladesh Harijan Unity Council
24. App-Based Transport Union
25. Daily Basis Peon-Cum-Guard at Grameen Bank
26. Bangladesh FMCG HR Society
27. National Forum for Domestic Workers
28. Bangladesh Gig Workers Association
29. Combined Military Hospital Dhaka Outsourcing Employees
30. Drivers Welfare Foundation
31. Bangladesh Government Employees Coordination Council
32. Outsourcing Employees
33. Bangladesh Outsourcing Employees Welfare Council
34. National Farmers Alliance
35. Metro Rail Project Outsourcing Employees
36. National Grassroots Disabled Organisation
37. Bangladesh Investment Development Authority, Outsourcing Employees
38. Bangladesh Business & Disability Network
39. Bangladesh Hawker Struggle Council
40. Bangladesh Marginal Farmers Association
41. Work and Health Safety Assistant Center
42. All affected Indigenous Fishermen in Baor Waterbodies
43. Expenditure Management-3 Branch, Finance Division, Ministry of Finance
44. Agricultural Workers Rights Platform
45. Grameenphone Workers Unity Council
46. Fire Service
47. Outsourcing Employees of Department of Agricultural Marketing
48. Khalishpur Jute Mill Factory Committee

49. National Road Transport Reform Committee
50. Sonargaon Textile Workers Employees Struggle Council
51. Agrani Bank PLC
52. Labourers, Workers, and Professionals in Tea Garden Areas
53. Outsourcing Employees, Cooks, and Cleaners of BFSCD
54. Urban Cleaners
55. Outsourcing Employees at Chattogram Port
56. Outsourcing Employees Welfare Council
57. Jute Mill Protection Movement (Jessore-Khulna)
58. Election Commission Secretariat
59. Olympic Cement Limited Workers Struggle Council
60. National Socialist Central Women Alliance
61. NESCO (Northern Electricity Supply Company PLC) Outsourcing/LEM Employees
62. Palli Poverty Alleviation Foundation (PDBF) Employees
63. Paint, Board, Timber Industry Workers Front, Bogura
64. Rickshaw, Battery Rickshaw, Easybike, Van Struggle Council, Bogura
65. Department of Archaeology Master Roll/Temporary Employees
66. Bangladesh Krishi Bank Security Guards
67. Dhaka Metropolitan CNG Auto-Rickshaw Drivers Unity Council
68. Master Roll Employees Unity Council
69. CMH Dhaka Outsourcing Employees
70. Master Roll Daily Wage Based Welfare Council
71. Bangladesh Seamen Workers Union
72. Bangladesh Tea Estate Staff Association
73. Unilever Bangladesh Ltd. Sales & Marketing Workers Employees Struggle Council

NGOs, Advocacy Groups, and Other Organisations that Submitted Recommendations

1. Naripokkho
2. Water and Sanitation for the Urban Poor
3. Bangladesh Workers Rights Council
4. Rana Plaza Accident Victims Rights Network
5. IPSA
6. ActionAid
7. Momota
8. Angry Women Society (Khubdho Nari Somaj)
9. CPD
10. Home-Based Workers Rights Network Bangladesh
11. Bangladesh Institute of Labour Studies
12. Bangladesh FSM Network
13. Bangladesh Women Workers Centre
14. Better Work Bangladesh
15. Harijan Unity Council
16. Gonoshasthya Kendra
17. Vision Spring
18. Ethical Trading Initiative
19. Bangladesh Institute of Planners
20. Working Women (Karmojibi Nari)
21. OXFAM
22. Safety and Rights Society
23. Médecins Sans Frontières
24. Citizen Initiative (Nagorik Udyog)
25. Working Women (Karmojibi Nari)
26. Bangladesh Legal Aid and Services Trust

27. Bangladesh Dalit and Excluded Rights Movement
28. Sanitation Workers Forum
29. Bangladesh Institute of Planners
30. Bangladesh University of Health and Sciences
31. European Union

List of Employers' Organisations That Submitted Recommendations/Demands to the Commission

1. National Tea Company Ltd.
2. Panchagarh District Bus, Minibus, Coach Owners' Association
3. Panchagarh District Truck, Tank Lorry and Covered Van Owners' Association
4. Bangladesh Employers' Federation
5. Rangpur District Truck, Covered Van and Tractor Owners' Association
6. BGMEA
7. Bangladesh Tea Association
8. Bangladesh Road Transport Owners' Association
9. Bangladesh Bus-Truck Owners' Association
10. BEPZA

List of Labour-Related Institutions That Submitted Recommendations to the Commission

1. Department of Labour, Chattogram
2. Department of Labour
3. Department of Inspection for Factories and Establishments (DIFE), Chattogram
4. Department of Inspection for Factories and Establishments (DIFE)
5. Industrial Relations Institute, Chattogram
6. Labour Welfare Centre
7. Industrial Police

8. Industrial Relations Institute
9. Department of Labour, Dinajpur

Appendix 4.3: List of Consultation Meetings with Workers, Employers, Professionals, Labour and Human Rights Organisations, and Labour-related Institutions

- Shramik Karmachari Oikya Parishad (Workers–Employees Unity Council)
- Workers' Safety Forum
- Bangladesh Horizon Oikya Parishad
- Senior Trade Union Leaders
- Labour Welfare Centre
- Department of Labour
- Labour Rights, Women's Rights and Human Rights Organisations
- Garments Workers' Organisations
- Department of Inspection for Factories and Establishments (DIFE)
- Bangladesh Outsourcing Employees Welfare Council
- Construction Workers' Representatives
- Representatives of Labour-related Government Offices in Chattogram
- SKOP and other National Trade Unions in Chattogram
- Representatives of Human Rights and Labour Rights Organisations in Chattogram
- Bangladesh Employers' Federation (BEF), Chattogram
- Oxfam (Women Workers' Rights in the Informal Sector)
- Labour Researchers
- Industrial Relations Trainers
- Labour Law Reform Committee
- Occupational safety and health Research Institutions
- Hawkers' Struggle Council
- ISC Representatives
- Ride-sharing and Transport Workers' Representatives
- Women's Trade Union Leaders

- SKOP and other National Trade Union Leaders in Khulna
- Bangladesh Employers' Federation, Khulna
- Human Rights Activists, Khulna
- Bangladesh Employers' Federation, Barishal
- Human Rights Organisations in Barishal
- SKOP and other Workers' Organisations in Barishal
- Beauty Parlour Workers' Organisations
- Bangladesh Road Transport Workers' Federation
- Representatives from Unlisted/Informal Sectors
- National Committee to Reform Road Transport
- OSHE Foundation
- Rana Plaza Victims
- Office-cum-Security Staff (Doptori-cum-Prohori)
- Labour Court Bar Association
- Various National Trade Unions (except SKOP)
- Government Employees Coordination Council
- Human Rights and Indigenous Peoples' Organisations in Rajshahi
- SKOP and other Trade Unions in Rajshahi
- Bangladesh Employers' Federation, Rajshahi
- Bangladesh Employers' Federation, Rangpur
- SKOP and other Workers' Organisations in Rangpur
- Light Vehicle Workers' Organisations
- Gig and App-based Workers' Organisations
- Domestic Workers' Rights Network
- Bangladesh Nari Shramik Kendra (Bangladesh Women Workers' Centre)
- American Trade Union Team
- Ethical Trading Initiative

- RISE
- Practical Action
- Garments Organisations under IndustriALL
- Sonali Bank Employees
- International Development Partners
- International Labour Organisation (ILO)
- WARBE
- Media Organisations
- Bangladesh Employers' Federation, Sylhet
- SKOP and other Trade Unions in Sylhet
- Tea Workers' Union and other Tea Workers' Organisations
- Bangladesh Employers' Federation and various Employers' Associations in Moulvibazar
- Medical Representatives' Organisations
- Indigenous Representatives
- Bangladesh Trade Union Council
- Industrial Police
- ILO Technical Team
- Bangladesh Trade Union Centre (BTUC)
- ILO Technical Team (Social Protection and Welfare)
- Agricultural Workers' Organisations
- Bangladesh Jatiyatabadi Sramik Dal (BNP-aligned Labour Organisation)
- Organisations Working on Disability Rights
- Economists
- Medical Professionals Working on Labour Issues
- Médecins Sans Frontières
- Bangladesh Bank Employees Federation
- Bangladesh Export Processing Zones Authority (BEPZA)

- National Coordination Committee for Workers' Education (NCCWE)
- European Union (EU)
- Master-roll Daily Labourers of the Department of Archaeology