
30 September 2019

Attention: Business & Human Rights Resource Centre

ELEVATE Response to Clean Clothes Campaign report, “*Fig Leaf for Fashion: How social auditing protects brands and fails workers*”

Prior to the September 2019 release of the report, “*Fig Leaf for Fashion: How social auditing protects brands and fails workers*”, Clean Clothes Campaign (CCC) invited ELEVATE to comment on draft excerpts of their report text. ELEVATE appreciated the opportunity to provide a fact check and to feed back to CCC with our additional commentary. The following is some of our response to CCC, together with supplemental remarks.

Introductory response

At ELEVATE, we endeavor to create great workplaces where workers are safe and respected in a thriving business environment. We believe this is a common aim shared by ELEVATE, CCC and our industry partners.

Beyond Audit

ELEVATE agrees that the industry has focused excessively on auditing. To address this we have been at the forefront of the “beyond audit” or “audit plus” model. We tackle sustainability in supply chains with a more holistic approach via our four business pillars: Assessment, Consulting, Program Management, and Analytics.

As a business, we do not carry out audits in isolation but look comprehensively at root causes and address remediation and improvement via ELEVATE’s Consulting disciplines spanning sustainability, supply chain and capacity building consulting. Our approach, solutions and supply chain intelligence platform EiQ are informed by ELEVATE’s high quality audit dataset that is blended with extensive data from ELEVATE’s worker engagement survey tools and eLearning courses.

ELEVATE’s Leadership Series conferences and webinars feature the latest thought leadership from our own experts and industry partners. Based on ELEVATE data and other data, our subject matter experts share analyses of emerging trends and issues, eg evolving program design (beyond audit) to maximize effectiveness, shifting trade flows, new sourcing risks, scalable capacity building, and how better transparency, trust and stronger partnership are needed between buyers and suppliers.

Earlier response to the CCC report in just-style.com

On 19 September, just-style.com [published a summary](#) of CCC’s “Fig Leaf for Fashion” report and included commentary from the ELEVATE CEO:

“ELEVATE CEO Ian Spaulding: ‘As the report indicates, ELEVATE has championed the ‘beyond audit’ model which addresses the shortfalls of programmes that focus only on conventional audits via the implementation of robust and proven improvement programmes.’

‘We are aligned with, and fully support, the report’s recommendation that audits and monitoring initiatives need to engage workers in a meaningful way. This is at the heart of ELEVATE’s worker engagement tools which identify social and labor risks directly from workers. Our worker sentiment data enables better insight into the issues workers face and helps promote more effective remediation.’”

We note that where factories operate in developing countries with lax labor law enforcement or protections, engaging workers in a “meaningful way” is a multi-stage process starting with helping workers to have a voice.

ELEVATE Worker Sentiment Survey combined with audits

We emphasize improvement services for factories, vendors, brands and retailers, in addition to assessment and auditing. Improvement services promote capacity building and worker engagement. Capturing worker insight for better business decisions and scalable impact was the primary reason for ELEVATE’s acquisition of Laborlink in 2017. In addition to capacity building expertise, ELEVATE’s sustainability and supply chain consultants across four continents also help drive continuous improvement.

ELEVATE acknowledges that social audits are not designed to capture sensitive labor and human rights violations such as forced labor and harassment. When we combine the ELEVATE Worker Sentiment Survey with audits, our data reveal that a higher percentage of workers have witnessed or experienced sexual harassment – 30% in Bangladesh, 28% in India and 6% in China in 2018. During the same period, auditors could identify cases of inhumane treatment (a category that includes sexual harassment and other verbal and physical abuses) in only 0.18% of audits in Bangladesh and 0.8% of audits in India.

The ELEVATE Worker Sentiment Survey comprises 17 questions that cover six topics (grievance mechanism, work atmosphere, wages and hours, production efficiency, workforce stability, demographics). To capture more reliable data on sensitive topics such as harassment, ELEVATE has made its anonymous ELEVATE Worker Sentiment Survey standard in the ELEVATE Responsible Sourcing Assessment (ERSA) in 8 of the company’s top assessment countries where over 80% of ELEVATE audits are conducted. This coverage is expanding.

Outcomes and impact of the Alliance for Bangladesh Worker Safety

The CCC report also cited the Rana Plaza factory collapse in 2013 as a case study of failed auditing. We agree that the industry failed the Rana Plaza workers, and their families and communities, hence the creation of the Alliance for Bangladesh Worker Safety, a safety initiative established by mainly US companies and operated between 2013 – 2018. ELEVATE was the management firm responsible for developing the local operation and managing inspections, remediation, factory support, training programs, helpline and worker surveys for the Alliance.

The outcomes of the Alliance's five-year program as reported in the fifth and final annual report in December 2018 include:

- Completion of 93% of remediation across Alliance-affiliated factories
- 428 factories completed all material items in their initial Corrective Actions Plans
- Nearly 1.6 million workers were trained to protect themselves in case of fire emergency.

The Alliance introduced the Amader Kotha Helpline, access to finance through work with IFC and USAID and - for factories that had to be closed - actually paid to workers lost wages.

Training rigor for ELEVATE auditors

ELEVATE's assessors and auditors follow some of the most rigorous internal and external training in the industry. New assessors will complete up to six months of training comprising classroom learning, field observations, integrity training, communication skills with factory management and workers, field practice, report writing and examinations. All training is aligned with the requirements of the Association of Professional Social Compliance Auditors (APSCA). Auditor and assessor quality and integrity are paramount to ELEVATE. The company is a founder member of APSCA and a member of the ELEVATE management team currently serves on APSCA's Executive Board.

In addition, ELEVATE's building, electrical and fire safety (BEFS) assessments are carried out by engineers holding the appropriate professional qualifications.

Conclusion

In conclusion, the social auditing industry has made solid gains over the last 20 years, but much improvement is still needed to keep workers and workplaces safe and thriving. ELEVATE is at the forefront of the innovation needed in technology, data, worker engagement tools, and scalable capacity building to bring about sustainable improvement in supply chains.

Additional information can be found on the [ELEVATE website](#). Our approach to worker engagement at ELEVATE is described in the linked document.

Submitted by ELEVATE