CONDUCTING COMPETENCY BASED WORK HEALTH AND SAFETY (WHS) TRAINING PROGRAMS FOR THE BANGLADESHI RMGS'

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ABSTRACT
The article seeks to assess the existing Work Health and Safety (WHS) training programs of the readymade garment (RMG) in Bangladesh, using the Australian competency based BSBSHWS501 vocational unit. In considering recent injuries and fatalities in the industry and the obvious lack of expertise in imparting WHS training, there is a dire need for new and structured WHS training programs. This article proposes to introduce a two-day training program for managers and supervisors of the RMG industry, involving "on-the -job" and "off-the-job" training that applies behaviourism and cognitive learning theories. The trainer may follow either the KLOB or VAK style as their method of training, but they must select the method that best suits their target group. Formative assessments at the end of the program will be central to the continuous betterment of WHS training through directly examining the growth of participant skills and knowledge. Furthermore, formative assessments will help participants to develop their skills to the highest level, which ultimately increases productivity and profitability and ensures WHS guidelines are always met. This kind of structured WHS training program would help workers to think and learn independently, assess and analyse problems and make quick decisions under exceptional circumstances. This is something that the RMG industry in Bangladesh desperately needs in order to avoid further casualties, counter backlash from international retailers and finally achieve international WHS standards.

INTRODUCTION

Work Health and Safety (WHS) training programs that are not properly thought out by qualified and knowledgeable experts, lead to poor safety measures and increased injuries and fatalities from hazardous practices. This project defines the importance of good WHS training programs and the global challenges facing readymade garment (RMG) factories in Bangladesh, where there are next to no safety measures in place.

The primary focus areas for this study include:
- learning theories behind safety training programs,
- training needs,
- samples of training plans,
- training structure,

- teaching approaches, and finally
- the formative assessment strategies which evaluate the developed and implemented training program.

This study also examines the global challenges to managing ethical consumerism in relation to safety training, the current status of WHS measures in Bangladesh and, by way of comparison, best practice for WHS in Australia.

TARGET TRAINING GROUP

The target group for this study are the current managers in the RMG industry in Bangladesh, along with supervisors in the wider sector. The duration of the training program to be offered is *two days*. The first day involves a face-to-face theoretical training class (off-the-job training) and the second day includes on-site delivery of training into job relevant safety procedures (on-the-job training). By improving safety program awareness among RMG sector employees, it is hoped that we will drastically reduce mortality rates and provide a safer work environment for all.

THE CURRENT STATUS OF WHS MEASURES IN BANGLADESH

WHS measures in the RMG industry in Bangladesh are significantly underdeveloped. As noted by several studies on current WHS measures, Bangladesh's RMG sector is among the worst in following WHS regulations (Rahim, 2013; Abdus-Sabur, 2012). Fire accidents, building collapses and other serious issues in factories have jeopardised employee safety which, coupled with broader health issues in Bangladesh, have caused mortality rates to increase at a disturbing rate compared to similar industries in other nations. Australian workplaces for example, demonstrate some of the best practice for WHS in the world (https://www.safeworkaustralia.gov.au/law-and-regulation/model-whs-laws). The almost negligible accidents and very low mortality rates are a testament to this. This has come from tailored and mandatory WHS training programmes, together with high industry standards for WHS. Australia's educational sector has adopted Business Services training packages, endorsed by the Industry Skills Councils (ISC). BSBWHS501 "Ensure a Safe Workplace" for example (https://training.gov.au/Training/Details/BSBWHS501 is a nationally endorsed training course that encompasses the knowledge and skills required for high WHS standards through its training and assessment tools. These types of courses need to be replicated and made accessible for the Bangladesh workforce. Sadly though, this is still a way off, as most factories do not even offer their new employees on the job safety training.

THE NEED FOR TRAINING

According to Zia et al (2013) WHS training has been considered important for a number of decades now. Proper training is essential in every company, even if employees and staff have gone through training at a previous workplace or are experienced in their field. Mandatory training develops the talents of all individuals and it opens the door for employees to seek help. It is highly beneficial and advantageous because many companies often train employees with their future endeavours in mind.

In any industry, workplace risks and issues can affect an employee's performance, health, safety and, ultimately, their attendance. Some of the obvious hazards include fire, collapsing structures, toxic air, and improper training in case of calamity or natural disaster. To avoid such hazards in the workplace, companies and organisations must employ health and safety measures. It should be compulsory for all organisations to implement strong actions and precautions regarding WHS training, because at the end of the day, when accidents or major calamities or

occur, safety training is what will enable employees to survive (Tejinder & Jyothi, 2013). Due to economic imbalances and fluctuations, organisational environments tend to adapt unique training activities depending on their company.

Until today, 35 ILO conventions have been ratified by Bangladesh. (http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103500) The ILO convention C155 (http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO::P11300_INSTRUMENT_ID:312300) and C161 (http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO:11300:P11300_INSTRUMENT_ID:312306:NO) are concerned with the Occupational Safety and Health and the Occupational Health Services respectively. Existing WHS law failed to provide proper framework for monitoring guidelines in relation to quantitative standard values and permissible limits. Both C155 and C161 motivate all parties including stakeholder policy makers, employers and employees. Although Bangladesh has ratified these two above conventions, but the non-compliances or non-implementations of labour laws, the country's legal constitution and the socio-economic condition have futile short and long-term effects on the economy of Bangladesh.

LEARNING THEORIES BEHIND SAFETY TRAINING PROGRAMS

Behaviorism, cognitive, and constructivism are the three main learning theories (Aliakbari & et al, 2015). Behaviorism theory highlights the learning impact on the behavioral changes, where behavioral reinforcement occurs due to a stimulus and a response. Similarly, Cognitive theories focus on internal processing such as thinking, understanding, organising and consciousness, all of which change the capacity and capability of the person to respond. Lastly, Constructivist learning theory highlights the engagement of the learner to actively seek and explore new material and different perspectives or knowledge with the purpose of finding relationships with their existing background knowledge through participation and engagement in relevant discussions.

According to Takahiro (2013) safety-training programs have only become popular over the last five years, as too many companies across the globe were ignoring health and safety leading to catastrophic events and fuelling concerns in ethical consumerism. During this time companies have invested more in professional safety training. Employees acquired very little knowledge even from training sessions as there was no gap training or need assessment - still indirectly supported the company's concern for safety.

Organisations should train their employees in workplace and task specific safety rather than offering only general safety training. According to Susan (2010), providing workers with opportunities to analyse problems, learn independently and make decisions and judgments under specific circumstances and scenarios is more effective than technical or oral type training. According to the theories of learning, an individual should be exposed to the three distinctive methods of learning: self-reflective, dialogic and instrumental. Furthermore, learning theories actually differ according to the needs of the individuals rather than the need of the company itself.

Learning theory for health and safety training should be based on behavioural theory, as discussed by Skinner (1971, pg 43). Skinner was an American psychologist (Watson, 1913) who introduced the notion of behaviourism as a *"Psychological perspective whose explanations about learning are based on the relationship between observable behaviours and environmental events rather than on internal processes."* Skinner's (1938) research drew attention to what he described as behavioural change as a function of response consequences. Put simply, learning is reflected in behaviour, such that outcomes produced by an action caused behavioural change. If we were to

take these ideas of learning theory and use them to assess the success of a WHS training program, accident rates would be the best indicators of behavioural transitions after completion of training.

The concept of behaviourism works best as the major safety demonstration or safety problems may increase the WHS effectiveness. Whereas the use of cognitive theory may assist WHS training programs to differentiate between objectives and goals in order to attain clarity in the work/outcome. It is also important to recognise that rewarding individuals for attaining better outcomes in any learning activity encourages behavioural changes that continue into the future.

THE TRAINING PLAN

In order to provide workplace and job specific training for employees and address the skills that they may be lacking, trainers must plan their training phases or programmes with a proper agenda. For instance, when we look at the provision of training for workers in the RMG sector, the trainer needs to plan considering the workplace, environment, duration of training, most appropriate delivery modality (i.e. whether training should be face-to-face or in group sessions), whether employees require individual attention or if their skills can be developed with orientation and on-the-job training. To design the training program the trainer should have prior exposure and/or experience on the topic or task so that the program accurately and effectively meets its purpose. A transparent training plan must have verifiable milestones incorporated into the structure. These milestones must be trackable in order to estimate the training objectives and gauge progress - SMART goal. (O'Neill and Conzemius, 2006). According to Rashed -Al (2005) the training plan should encompass: personal details, training objective, main/training details, delivery models, training evaluation, outcome, structure of the responsibilities, the workplace tasks and finally the assessment methods. The outcomes of the training program BSBWHS501 'Ensure a Safe Workplace' should encompass new knowledge, skills and abilities learned by students. A successful outcome of the learning objectives and SMART goals should align with the overall training goals and allow the participants' to develop experience. To illustrate the successful implementation of the program outcomes, the overall functional concept is depicted in the figure 1. The following table also represents how learning objectives are associated with the training goals, learning methods/activities, evidence of learning and evaluation activities.

Figure 1: Training goal aligned to learning objective

Training goal (SMART)	Learning objectives	Learning methods / activities	Documentation / evidence of learning	Evaluation
Overall results or capabilities you hope to attain by implementing our training plan.	What we will be able to do as a result of the learning activities in this plan.	What we will do in order to achieve the learning objectives.	Evidence produced during your learning activities -- these are results that someone can see, hear, feel, read, smell.	Assessment and judgment on quality of evidence in order to conclude whether you achieved the learning objectives or not
Source: McNamara (2017). Cited on https://managementhelp.org/training/systematic/designing-training.htm				

STRUCTURE OF THE TRAINING

The first day in any training program usually consists of "off the job" training sessions, where the theories involved in real-time scenarios can be thoroughly explained. Off-the-job training is an effective way to look at the cause and effect of scenarios. As lessons are applied, individuals are able to increase their cognitive abilities surrounding situations by having time to inquire about the reasoning behind procedures and functions. On the second day, sessions should be run as on-the job training to allow individuals to put the theories learned into practice; this is where observational skills pay off (Paul &Garry, 2007). Off-the-job training (theories through presentations, videos, workshops, etc.) is generally less effective compared with on-the job training (field experimentation), but both work best when used together. This is for many obvious reasons including: exposure, experience, environmental effects and practical and live explanations with suggestions on how to correct mistakes immediately. If organisations worked alongside trainers to plan proper training structures, then large-scale mishaps would be avoided. Furthermore, through proper training companies can ensure employee safety, security and health without having to resort to bullying and harassment (Nakib & Mia, 2014).

TRAINING PEDAGOGY AND FORMATIVE ASSESSMENT STRATEGIES

Trainers often adopt both systematic and behavioural approaches when developing training programs. These are in fact, the very best methods or approaches to teach employees the skills they lack. In the systematic approach, trainers teach employees through regular classes and sessions, allowing individuals to gain insight regarding issues they or their company might face. In the behavioural approach, trainers adapt teaching methods to the individuals' behaviour according to their specific needs.

The teaching styles preferred by most practitioners are the KOLB and VAK styles. The KOLB learning style (Kolb &Kolb, 2005) consists of four categories while the VAK learning style (James Cook University, 2013) consists of only three. Both are outlined in Figure 2 below.

Figure 2: Learning Styles

KOLB LEARNING STYLE	FLEMING'S VAK MODEL
Concrete Experience – a concrete situation or problem, which forms the basis for a new learning experience.	Visual learners have a preference for seeing (think in pictures; visual aids such as overhead slides, diagrams, handouts, etc.).
Reflective Observation – think about and articulate the why's and how's of their concrete experience.	Auditory learners best learn through listening (lectures, discussions, tapes, etc.)
Abstract Conceptualisation – begin to understand the general concept of which their concrete experience was an example.	Kinesthetic learners prefer to learn through experience by moving, touching, and doing (active exploration of the world; science projects; experiments, etc.).
Active Experimentation – use theory to make predictions and test their assumptions.	
Source:http://thepeakperformancecenter.com/educational-learning/learning/preferences/learning-styles/	

Our orientation between KOLB and VAK styles should not be fixed. We should consciously ensure that the two days of training engage our target group using the most relevant modes of teaching.

At the end of a training session or program, formative assessments are the crucial stage where pre- and post-training knowledge can be measured. Formative assessment strategies (Wang et al, 2006, pg. 209) usually include short tests and quizzes, in class question and answer sessions, assignments, homework and so on. Indeed, training assessment tools are used by trainers globally comparing formative assessments with post-training evaluation of individuals in order to measure without bias. Assessments also offer the trainer the opportunity to amend their own training programmes through receiving ongoing feedback on participants' growth in performance. Ultimately, proper WHS training requires formative assessments for employees to acquire skills, which will in turn increase profitability, productivity and skill improvement to the highest level, reducing costs that could be incurred due to health and safety incidents.

While formative assessments are essential, numerous studies (Dennis et al, 1981; Jean-Paul and Claire, 2004) have shown that employee training within organisations is only truly effective when employees learn and implement the learned strategies at their workplace afterwards. Thus, training effectiveness is best seen through changes in employee working behaviours and practical abilities.

ETHICAL CONSUMERISM AND GLOBAL ISSUES RELATING TO SAFETY TRAINING PROGRAMS

"Ethical consumption" is a term used broadly to refer to the ethical considerations of companies as well as consumers. Strong (1996) defined ethical consumerism as the behaviour of a buyer who considers principles of environmental consumerism and human rights in their purchasing. Ethical consumerism has recently demanded that garment factories and their owners consider the lives of their employees, rather than thinking solely about profitability, productivity and cutting costs.

Sweatshop working conditions in the RMG sector have regularly violated International Labour Standards (ILS) and Codes of Conduct (CoC) (Uddin, 2008 and Dasgupta, 2002). RMG

industry recruitment guidelines and policies are exceedingly informal when evaluated according to standards of Western countries. It has also been noted that there are rarely documented appointment letters or formal contracts. Employees in the RMG sector are consequently susceptible to losing their jobs at any point without the need for explanation. Nonetheless, the fear of not keeping their jobs and a deficiency of alternative job opportunities lead workers to take on unacceptable and substandard employment conditions (Hossan et al, 2012).

In the Bangladesh RMG sector, there have been several serious accidents that have occurred due to improper safety training and unethical practices. These calamites ranged from general confusion or inept practices due to improper training, resulting in accidents that lead to death or disability (Ataur & Robin, 2010). The industry is guilty of not providing worker access to a myriad of necessities including fire extinguishers and other safety measures, health insurance, and so on. They often pay labourers minimal allowances to increase their company's profitability and do not invest in proper training programmes. They also recruit illiterates and the uneducated so that they can pay less and ignore the provision of proper agreements covering employee benefit statements (Ataur & Stuart, 2010). Fortunately, consumers and brands that purchase clothing and fabric from Bangladesh reacted to these incidents and conditions by starting boycotts and raising global awareness of these issues and risks. The boycotts forced Bangladeshi companies to follow laws and regulations and start to better equip their employees with proper training.

Globally, companies implement training programs in the workplace to combat health and safety issues. Indeed those companies who train their employees to follow regulations and standards will always succeed in increasing their profit margin and reducing costs incurred through calamities.

Companies are taking their responsibilities out whenever there is a question of 'Training Cost' arrangement. At a recent conference at Harvard organised by ISDI, all primary and secondary stakeholders agreed that on the downward pressure on manufacturing price. Consumer demand side in two ways. Consumers are now buying more high-end products and this negatively impacts on these apparel and footwear sellers. In addition more money is now being spent on healthcare, rent, home-related products, electronics and cars compared with garments. Relationship between cost of clothes and food has an wider impact on the income, associated up or down accordingly. (Shibli, 2017).

Despite these two major issues, secondary stakeholders are still pushing for more training and improved employee safety due to the importance they now place on ethical consumerism. Nonetheless, these stakeholders want to keep their profit margins the same and they continue to push manufacturers to supply them with low cost garments. Internal competition between the top suppliers puts pressure on manufactures to lower the cost on large orders. Foreign buyers keep samples of garments and when they require a specific style or design, they ask manufactures to bid on the cost and then they chose the cheapest source for the finish product. It is important to realise here, that since international compliance demands better safety and training arrangements, there is little room for the supplier/manufacturer to ask for extra money and still maintain 100% compliance. It is thus clear, and I have seen this in my own professional experience, that while companies often hold a *positive image* as safety supporters they still sublease their work to under-rate factories to save costs and boost profits.

CONCLUSION
The worldwide significance of mandatory safety training programs was made clear through the deadly incidents in Bangladesh's RMG. It is indeed better for company image and profits to prevent health and safety problems rather than correct or pay for mistakes after they occur. By adopting the best training methods and approaches from the start, companies around the globe can concentrate on the workplace arrangement instead of constantly investing in yearly training. Using both on- and off-the-job training together is considered to be the most effective for employees, therefore when trainers plan their programmes it is best to include both approaches (impart skills and knowledge) rather than sticking to one.

Based on this secondary research, it is clear that WHS issues require a 'True Spirit in a Holistic Way'. Both primary stakeholders who are directly associated with the RMG i.e. employees, employers and secondary stakeholders i.e. policy makers, legislators, employers, and all other members of society need to realise that individual and economic development can only occur through the best WHS practice. As a result, the fruit of industrial development triggers the social goals. There should be a strong awareness about the consequences of not addressing WHS problems and not implementing proper WHS standards.

Overall effective training not only increases individuals' skills but also improves overall performance, in turn increasing the company's profitability. Only when skills, performance and profit aligns in a circle, then top-down appreciation for the importance of WHS training in places like Bangladesh's RMG industry, will better standards be realised.

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