

Frequently Asked Questions

What are the benefits of colleges and universities affiliating with the WRC?

The WRC's core work is assisting colleges and universities with enforcing their manufacturing codes of conduct and combating labor rights violations at factories producing their logo apparel. WRC affiliates receive accurate, thorough, timely, and impartial assessments of conditions in factories that produce collegiate apparel and whether these conditions comply with universities' codes of conduct. Where problems are identified, the WRC works with licensees, factory managers, workers, and worker advocates to eliminate violations and move the factory toward compliance. Often, this occurs without any need for direct engagement by universities, though such participation is always welcome. In some cases, universities choose to use the detailed information contained in WRC reports as a basis for communicating concerns to licensees. The WRC also provides a means for colleges and universities to work together with other schools to address problems with a particular licensee or factory.

The WRC is also a respected resource for information and research on issues in the global apparel industry. We have extensive information on economic and legal issues in apparel-producing countries, which we make available to our affiliates. Universities can consult with the WRC staff and our international network of advisors on our areas of expertise.

More broadly, by participating in the WRC, a university sends a strong message to concerned parties—students, faculty, and licensees—that the university is committed to ensuring that its licensing operations have a positive impact on the factories that produce their logo goods.

What are the responsibilities associated with affiliating with the WRC?

Affiliates are required to:

- Adopt a manufacturing code of conduct and work toward the incorporation of this code into applicable contracts with licensees;
- Ask licensees to provide the WRC with a list, updated quarterly, of names and locations of all factories involved in the production of their logo goods; and
- Pay annual affiliation fees, which are either \$1,500 or 1% of gross licensing revenues, whichever is greater, up to a maximum cap of \$50,000.

How do schools obtain lists of factory locations? Is it difficult for schools without licensing programs to acquire this information?

Affiliate schools require that their licensees or apparel vendors provide them with lists of factories where their logo goods are produced. These lists are updated and reported to the WRC on a quarterly basis.

Universities that work through the Collegiate Licensing Company (CLC), Exemplar, or Fermata generally authorize these organizations to report the relevant factory disclosure directly to the WRC, which simplifies the process for both the schools and the WRC. Schools that license independently provide the data directly to the WRC after collecting it from licensees. Licensees that conduct any significant amount of collegiate business and that have relationships with more than a few schools are typically already collecting and supplying this data, because they are working with one or more schools that are already members of the WRC or the Fair Labor Association (FLA). Thus, for the great majority of licensees, and for many vendors, the decision of a college or university to ask for disclosure does not generate a significant additional burden.

What provisions are schools required to include in their codes of conduct?

The code of a college or university is sufficient to meet WRC affiliation requirements if it provides basic protection for workers in the areas of wages, hours of work and overtime compensation, freedom of association, workplace safety and health, women’s rights and gender-based violence and harassment, child labor and forced labor, harassment and abuse in the workplace, non-discrimination, and compliance with local law. Affiliates are encouraged to adopt a code as strong, in all respects, as the WRC model code, which, includes, for example, provisions requiring payment of a living wage and compliance with OSHA health and safety standards. However, this is not a requirement.

How does a college or university become affiliated?

When a college or university decides to affiliate with the WRC, this affiliation is expressed in the form of a letter from the school’s President or Chancellor, or other official designated by the school, to the WRC stating the institution’s decision to affiliate and its recognition of the three obligations of affiliation: maintaining a manufacturing code of conduct, providing the WRC with factory disclosure information, and paying affiliation fees. Each college and university also designates a contact person from the administration to serve as the main liaison to the WRC.

My city (or town, state, school district, etc) just passed an anti-sweatshop purchasing policy. Can we affiliate with the WRC?

Only colleges and universities can affiliate with the WRC. The WRC does conduct factory assessments for cities, state governments, school districts, and other institutions on a case-by-case basis. Contact the WRC for details.

What is the WRC's governance structure?

The WRC is governed by an 18-member board, which includes six representatives of university administrations elected by the University Caucus, six representatives of United Students Against Sweatshops, and six representatives of the WRC Advisory Council, an international body of human rights and labor rights experts. The Governing Board meets three times per year and is involved in WRC business between meetings.

What is the fee structure?

Colleges and universities with licensing programs pay annual fees of 1% of their previous year's gross licensing revenues, with a minimum fee of \$1,500 and a maximum of \$50,000. Colleges and universities that do not have licensing programs pay a flat annual fee of \$1,500.

What is the WRC's budget? What are the WRC's funding sources?

The WRC's budget is currently about \$2 million. Of the WRC's total revenue, about 65% comes from university affiliation fees, 25% from federal and foundation grants, and the remainder from individuals and other partners for whom the WRC carries out monitoring work. The WRC does not accept contributions from for-profit corporations or from labor unions. Detailed budget information and audited financial statements from prior fiscal years are available to affiliate schools upon request.

What is the WRC's tax status?

The WRC is a 501(c)(3) non-profit corporation.

Can schools join both the WRC and the FLA?

Yes. Many colleges and universities are affiliated with both organizations.

How does the WRC relate to licensees?

The WRC has built strong working relationships with many of the most important collegiate licensees. In all cases where WRC assessments have led to successful remediation, licensees have played a central role in the progress made toward improving conditions in these facilities. In many cases, the WRC and the relevant licensee(s) worked very closely on the remediation process. The WRC's goal is not to embarrass licensees but to promote real improvements in factory conditions. For this reason, when violations are identified at a factory, the WRC generally seeks to give licensees an opportunity to address the problems prior to the issuance of a

public report. In many cases, this allows the WRC to state that violations have been eliminated at the same time we report these violations publicly.

The WRC has often been asked why there are no industry representatives on the WRC Governing Board. The WRC believes that there is an important role to be played by monitoring organizations that operate independently of the apparel industry itself. The WRC therefore decided to maintain independence from licensees in terms of organizational governance and funding, while engaging in constructive dialogue and cooperation with licensees in the course of our work. The WRC's independence is a crucial asset to the organization and to affiliate colleges and universities. This independence allows the WRC to get information from workers and worker advocates about factory conditions that other monitors cannot obtain. It helps factories and licensees communicate with workers and their representatives to resolve problems and disputes. Our independence enhances the credibility of the WRC's reports. It also enables colleges and universities to report that their licensees' supply chains are subject to investigations by an organization that operates entirely independently of the industry.

Do licensees simply sever contracts when problems are uncovered at their supplier factories?

The WRC strongly encourages licensees to stay and work to correct violations at problem factories. The WRC views "cutting and running" from a factory as a serious abrogation of a licensee's responsibilities. As key licensees have come to understand that colleges and universities will not accept a "cut and run" approach, they have a strong incentive to fix problems.

Aren't there too many codes out there? Doesn't it get too confusing to figure out how to follow codes? How should licensees comply?

There are indeed many different codes of conduct, but, in reality, most of the codes are very similar. Most have language on the same general provisions, and most codes reference international and domestic law. Factories making a good faith effort to comply with national laws and widely-recognized international standards are, in most cases, going to be in compliance with the WRC model code and the codes of WRC affiliates.

Will colleges and universities be liable for WRC actions?

Based on extensive research by the WRC's attorneys, we do not believe that affiliate universities face any significant threat of liability for the actions of the WRC. However, schools must ultimately rely on the judgment of their own legal counsel in reaching conclusions on this question. Since the WRC's founding in 2000, no affiliate school has faced such liability.

Are reports of WRC factory investigations made public?

Yes. Reports of collegiate factory investigations are made public on the WRC website and distributed to affiliate colleges and universities.

Does the WRC do other work in addition to factory investigations?

Yes. Our other work includes:

Worker complaint mechanism. Working with local NGOs, the WRC conducts trainings for workers at collegiate apparel factories to inform them of their rights under college and university codes of conduct, including their right to lodge a confidential complaint if they believe there are violations in their workplace. These trainings help workers understand how to bring complaints about workplace violations to the attention of trusted NGOs and, through them, to the WRC. Since no monitoring organization can be in every factory every day, the best way to ensure that colleges and universities learn about problems in their factories is for the workers themselves to serve as front-line monitors.

Research. The WRC conducts research on important issues and trends in apparel production. In Haiti, we conducted research on factories' widespread failure to pay workers the legal minimum wage—research that ultimately helped end this wage theft, so that workers are now paid what they are owed. Our recent publications include a report documenting the poor working conditions in Ethiopia's growing garment industry, where some workers were paid as little as \$0.12 per hour and a report on the increasing repression of civil society in Bangladesh.

Factory disclosure database. The WRC maintains a comprehensive, interactive, up-to-date database of factory names and locations for all factories producing goods for WRC schools as reported by licensees.

Broader initiatives. Building on the insights and best practices developed in the collegiate sector, the WRC works with our allies to support initiatives that promote positive change in the garment industry overall. This is particularly crucial in combating violations that affect workers at collegiate factories and cannot be fully addressed on a factory-by-factory basis. In the wake of the disaster in Bangladesh at Rana Plaza, which killed 1,137 workers and injured thousands, the WRC helped create the Accord on Fire and Building Safety in Bangladesh, a historic, binding agreement that has dramatically improved workplace safety for two million workers across the Bangladeshi garment industry. More recently, the WRC supported a coalition of Lesotho worker and women's rights organizations in launching a ground-breaking, enforceable program to combat sexual harassment and coercion in garment factories in that country.