



Annual External Compliance Report of the Supreme Committee for Delivery & Legacy's Workers' Welfare Standards

Resilience in testing times



MAKING WHAT'S GOOD FOR WORKERS
WORK FOR BUSINESS

April 2021

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Glossary of terms

Bulletin I

Revisions and additions to the Workers' Welfare Standards (WWS), published in February 2018

BWI

Building and Wood Workers' International, a global trade union representing workers in the construction sector

Contractor

Any party that has a contractual standing in the Supreme Committee for Delivery & Legacy's (SC's) supply chain. This includes main contractors, who have a direct relationship with the SC, as well as the companies that have a contractual relationship with the main contractor. A contractor to a main contractor is referred to as a Tier 1 subcontractor. A contractor to a Tier 1 subcontractor is referred to as a Tier 2 subcontractor

COVID-19

Coronavirus disease of 2019

GCC (Gulf Cooperation Council) Approved Medical Centers Association (GAMCA)

Association created to provide medical examinations to expatriates intending to join the Labour Market in the GCC countries

H&S

Health and Safety

Joint Committees

Joint Labour Committees - represented by both workers and management staff.

Manpower agency

Companies that employ workers and lease them out to other companies to provide a variety of services.

MOI

Ministry of Interior

MoADLSA

Ministry of Administrative Development, Labour and Social Affairs

NOC

No Objection Certificate

Prescribed language

The WWS define prescribed languages as "the languages of Arabic, Bengali, English, Tagalog, Hindi, Nepali, Tamil and Urdu"

Programme Welfare Forum (PWF)

Joint forum of the SC's Workers' Welfare Department (WWD) and main contractors' Workers' Welfare Officers (WWOs) at construction sites where there are over 50 workers to discuss priority issues and exchange best practice

Project Workers' Welfare Forum (PWWF)

Workers' Welfare Forum (WWF) at construction sites where there are over 500 workers

Project Workers' Welfare Officer (PWWO)

Representative of a main contractor in a PWWF

Qatar International Safety Centre (QISC)

Professional H&S training provider based in Qatar

Qatar Labour Law (QLL)

National legislation regulating rights and benefits for employees to which employers must adhere as well as the obligations of employees working in Qatar

Qatar Red Crescent (QRC)

The Qatari branch of the Red Crescent Society

Qatar Visa Centres (QVC)

Centres established in several workers' home countries to facilitate pre-departure medical checks and processing of employment contracts

SC

Supreme Committee for Delivery & Legacy

Sedex Members Ethical Trade Audit (SMETA)

Globally used format for social audits

Social and Economic Survey Research Institute (SESRI)

Academic research institute, part of Qatar University

Technical Cooperation Programme (TCP)

Joint programme of the International Labour Organization (ILO) and the State of Qatar to ensure compliance with ratified international labour conventions and help achieve incremental progress on upholding fundamental principles and rights at work

The SC's Universal Reimbursement Scheme (SCURS)

The SC's scheme for reimbursing workers in recompense for recruitment fees and related charges they may have paid, irrespective of evidence provided by workers. Previously known as 'Universal Payment'

This year and 2021

Reporting period for this report: January 2020 to February 2021

Weill Cornell Medicine – Qatar (WCM-Q)

Professional healthcare institute, part of Cornell University

Wage Protection System (WPS)

The WPS is a system launched in 2015 by MoADLSA that requires employers to pay employees' wages through bank accounts and to submit details of these payments to MoADLSA. The system is designed for MoADLSA to check the timeliness and regularity of payments and phase out the payment of wages in cash

WWD

Workers' Welfare Department

WWF

Workers' Welfare Forum
(at accommodation sites)

WWO

Workers' Welfare Officer

WWS

Workers' Welfare Standards

Compliance terminology

Impactt's audits produced three types of finding:

- Non-compliances (NCs) with the WW Standards and/or Qatar Labour Law: Material breaches of legal or contractual requirements. The term "compliance" means the extent to which contractors follow the WW Standards and Qatari labour law.
- Observations (OB): Issues that could become a breach of the WW Standards or Qatar Labour Law if no action is taken to address them, areas that lack the full weight of evidence necessary to demonstrate non-compliance (these issues require further investigation), or areas that fall outside of WW Standards and legal requirements but are important to workers.
- Good examples: These are cases where contractors go above and beyond the minimum WW Standards or legal requirements, or demonstrate sustained improvement

During the course of each audit, Impactt's auditors classify each non-compliance according to their severity as follows:

- Critical: Imminent risk to workers' safety or risk to life and limb, a significant breach of employees' human rights; a recurring major issue that has not been addressed, or an attempt to pervert the course of the audit.
- Major: A material breach of the SC WW Standards or Qatar Labour Law which is not a minor.
- Minor: An occasional or isolated problem, an issue that represents low or limited risk to workers or those on site, or a policy issue or misunderstanding.

Impactt's auditors classify observations as follows:

- Critical: Represents a severe or imminent risk to workers' welfare.
- Non-critical: Represents a non-severe or non-imminent risk to workers' welfare.

Executive summary

This is Impactt's fifth Annual Report, presenting the results of our independent external monitoring of the Supreme Committee for Delivery & Legacy (SC) Workers' Welfare Programme. The report shares the findings of Impactt's audits (between January 2020 and February 2021) and measures the SC's progress against the Roadmap defined in our 2020 report.

The SC first appointed Impactt as external compliance monitor in 2016. Impactt's role is to monitor the compliance of contractors against the SC's Workers' Welfare Standards (WWS), provide advice and publish an independent, annual external compliance report.

The SC implements a four-tier auditing system against the WWS, comprised of contractors' self-audits (first party), comprehensive SC audits and inspections¹ (second party), External Monitor audits (third party), and ad-hoc inspections conducted by the Ministry of Administrative Development, Labour and Social Affairs (MoADLSA)².

The SC's audit and inspection regime is complemented by joint health and safety inspections conducted by the SC and Building and Wood Workers' International (BWI). In addition, the SC carries out health, safety and security inspections on a revolving monthly plan.

COVID-19

This year, the COVID-19 pandemic has profoundly impacted all areas of life globally. Migrant workers across the world have been particularly vulnerable to health, financial and human rights impacts. However, despite the challenges, the SC's Worker Welfare Programme has proved effective in mitigating these impacts, while also continuing to address the fundamental criteria of the Roadmap.

From early in the crisis, the SC prioritised worker safety and awareness. This focus drove high levels of confidence among workers, with 100% of workers interviewed by Impactt reporting feeling protected from COVID-19 risks and satisfied with the protective measures put in place. Impactt's assessment shows similar compliance rates to the previous year (72% initial compliance, rising to 82% at follow-up audit) underlining the resilience of the social compliance system.

COVID-19 and the measures established to combat it have impacted all stakeholders. While there was no total lockdown in Qatar, at certain times workers faced COVID-19-related safety measures restricting movement outside their accommodation and were also unable to travel home for annual leave due to global restrictions on travel. In some cases, COVID-19 control measures resulted in fewer opportunities to earn overtime pay. The SC focused on limiting the financial impact on workers, working with contractors to prioritise worker payments. Impactt's assessment found a 9% increase in compliance on wages and allowances this year. Workers' satisfaction with their income and progression has also increased by 4%, now at 52%.

¹ Please refer to the SC Annual Progress Report for further details

² MoADLSA audits follow Qatari labour law rather than the WWS

The pandemic has also impacted contractors. COVID-19 risk mitigation measures have increased costs, the ban on international recruitment has disrupted plans and some contractors reported cash flow issues. Home-working measures affecting government offices disrupted some contractors' efforts to complete administrative requirements, such as health screenings or renewals of paperwork, at the required intervals.

Changes to methodology and categorisation of findings due to COVID-19

Impactt usually conducts four monitoring visits annually. This year, we made one standard visit (in January 2020) before the pandemic took hold, and two 'hybrid' visits in (November 2020) and (February 2021) during the pandemic, combining on-the-ground and remote approaches. The 'hybrid' approach used a reduced ground team of four people, plus eight to ten auditors and worker interviewers working remotely. The ground team supported the set-up of video calls, observed interviews to ensure transparency, and conducted inspections and reviews where digital copies were not available in time or transparency could not be ensured. We do not believe that this approach significantly impacted our diagnostic ability.

Given the safety measures outlined on the previous page, we categorised findings of this kind as observations rather than non-compliances where an issue was COVID-19-related and when we deemed the actions taken by the contractor to be reasonable in the context of keeping workers safe.

Scope of Impactt's Work

SC's Scope contractors and tiers 288 Total contractors on SC projects				SC's Scope workers and main nationalities 17,639 Total workers of 69 nationalities on SC projects				
Main contractors: 64	Impactt sample: 12 Contractors audited (2%)			Indian: 42%	Impactt sample: Worker interviews 394 (2%)			
Tier 1: 176	Main contractors	Tier 1	Tier 2	Bangladeshi: 24%	Indian	Bangladeshi	Nepali	Other
Tier 2: 46				Nepali: 19%				
Tier 3: 2	3 (4%)	4 (21%)	5 (11%)	Other: 13%	29%	27%	27%	17%

As a part of the SC's focus on building a meaningful legacy, Impactt piloted a new training-led model with two contractors. The model aimed to increase contractor understanding, help them to achieve workshop improvements, and drive lasting change on previously intractable issues.

It consisted of a rapid assessment, including all aspects of the usual audit process, except for 'accommodation and food' and 'transportation'. This was followed by tailored training, focusing on topics with the lowest compliance scores, monitoring calls and follow-up audits.

The two contractors scored 76% and 80% at initial audit but were both able to achieve a compliance score of 91% at follow-up. This shows an improvement in compliance of 15% and 11% respectively, both of which are higher than the average improvement rate of 9% this year.

Findings

Compliance results remain broadly comparable to previous years across the 12 contractors audited, showing resilience in testing times. Impacttt found an increased average initial compliance rate of 72% across the 12 contractors audited, up from 69% in 2020.

Contractors closed out or made progress on 70% of the issues, up from 63% in 2020. Impacttt identified fewer priority areas, with the overall severity of issues declining in 9 of the 15 topic areas. We found an increase in compliance scores in wages and allowances from 78% in 2020 to 87% in 2021, in working hours from 80% in 2020 to 82% in 2021, and in working conditions from 83% in 2020 to 90% in 2021.

Impacttt notes an increase in worker satisfaction since our role began. Overall worker satisfaction has risen from 3.0 to 4.3 out of 5 across the four-year period. Stable income and safe working conditions remain at the centre of these improvements.

The innovative SC Universal Reimbursement Scheme (SCURS) continues to be widely implemented. The scheme has now been in operation for over three years. Participating contractors have demonstrated that they go beyond compliance to provide reimbursement of recruitment fees to workers without the need for proof.

The SC calculates a total reimbursement by contractors of up to USD 28.2 million to 30,748 SC and 18,066 non-SC workers over a 36-month period. Based on the SC's audits and inspections, the SC reports that as of December 2020, USD 21.4 million of the total to be reimbursed had already been paid.

MoADLSA has attested 209 contractors' SCURS commitment letters. This provides the scheme with some powers of enforcement, enabling MoADLSA to take action against any contractors that fail to meet their commitments. The SC's legacy in driving recruitment fee repayment should not be underestimated. Many of the principles underlying SCURS have been adopted and refined by other sectors and in other geographies.

This work is taking place amid important changes in the adoption of a non-discriminatory national minimum wage (March 2021), as well as the dismantling of the Kafala system through the abolition of exit permits (January 2020) and No Objection Certificates (NOC) (September 2020). These changes mark major steps towards the promotion of higher standards of worker welfare and freedom of movement, and are particularly significant given the regional context.

The following section outlines key findings on priority topics:

Ethical Recruitment³:

The challenge: Impactt found issues related to Ethical Recruitment at all 12 contractors audited. The root causes of this lie beyond the SC and its WWS, and resolution will require working more closely with labour source country governments and the extended labour supply chain to ensure that the payment of recruitment fees and related charges is prevented from the outset.

Progress: Impactt verified that 11 of 12 contractors audited were participating in SCURS.

Nine of these 11 contractors are continuing to pay SCURS to workers even after they have transferred to non-SC projects. This represents a significant improvement from last year's audits, which found just four contractors (from the larger sample of 22) were paying SCURS beyond demobilisation.

Workers are more commonly aware of SCURS being a recruitment fee reimbursement (+51% increase in awareness, year on year). This increases workers' satisfaction with income by 9 to 11%.

Wages and Allowances:

The challenge: Compliance in wages and allowances has risen to 87%, but challenges remain in the delayed payment of wages. This year, contractors cited COVID-19-related issues, and the subsequent delays to their operations, as the main cause for delayed wage payment to workers.

Progress: MoADLSA announced the new non-discriminatory minimum wage⁴, effective from March 2021. This stipulates a minimum wage of USD 274 per month, plus USD 136 per month for accommodation and USD 82 per month for food, if neither is provided. MoADLSA is supporting contractors to update employment contracts, where workers earn less than the amount established by the new law.

We found that five out of six contractors initially audited in Q4 2020 had implemented this minimum wage, well in advance of the effective date.

68% of workers surveyed reported earning enough to cover their families' needs, including education for their children and medicine for elderly family members. This is a steady increase over the years, up from 45% in 2018.

Last year, our report found that ten contractors had uncovered issues related to payslips, with six not issuing them at all, and four issuing them inaccurately or unclearly⁵. In comparison, this year no critical issues were raised in this regard, with only one major non-compliance, which was closed at follow-up.

³ This topic was formerly named 'Recruitment fees' in reports prior to 2020

⁴ <https://www.gco.gov.qa/en/top-news/adlsa-statement-minimum-wage-noc/>

⁵ See, for example our previous annual report (2020), page 36

Personal documents:

The challenge: While compliance remains at a high level in this area (initial (85%) and follow-up (88%)), scores have been steadily declining over the past four years. The severity of findings in this topic area has remained high both this year and in 2020. Although instances of passport retention have generally decreased since our work began in 2016, we still identified one contractor retaining passports, and another only returning them the day before our initial audit.

Progress: The State of Qatar has made further progress in dismantling the kafala system with the abolition of the NOC in September 2020, following the abolition of exit permits in January 2020. This meant that from September 2020, migrant workers who are subject to Qatar Labour Law no longer require their employer's permission to transfer to a new employer, with the result of granting workers greater freedom of movement. This will present new challenges to contractors who can no longer rely on these certificates to ensure worker retention while at the same time, creating the opportunity for contractors to use positive incentives to encourage workers to stay.

Conclusions and recommendations

The SC has shown resilience in the face of the COVID-19 pandemic, maintaining comparable compliance results, year on year. This is a significant achievement, given that elsewhere the pandemic has highlighted and deepened worker welfare issues.

Overall, issues per contractor decreased this year and worker satisfaction increased to an all-time high over the four-year reporting period. This is a tribute to the SC's prioritisation of worker welfare from the outset of the pandemic, and its rigorous Worker Welfare systems.

The SC has pioneered the reimbursement of recruitments fees through SCURS and this year further strengthened its implementation. The SC's commitment to promote SCURS has led to some contractors extending SCURS beyond SC programmes and to non-SC workers.

Key challenges remain for all actors working with migrant workforces, most particularly in reinforcing Ethical Recruitment to ensure that recruitment fees and related costs are prevented in labour source countries. Below, we detail further recommendations under the three-pillar roadmap (introduced in our 2020 report) to support the SC to lead by example.

We encourage the SC to focus in particular on Pillar 2 – Reinforcing Ethical Recruitment. The SC has the opportunity to demonstrate how the Tournament can make a significant difference both in Qatar and beyond.

Pillar 1 – Ensuring legacy

Recommendations:

1. Work with the public and private sectors to advocate for worker welfare beyond SC projects and on a wider scale. This includes formalising groups within the service sectors (hospitality in particular) and engaging with new stakeholder networks, as appropriate.
2. Continue the cooperation with MoADLSA to establish proven best practices of the WWS and its implementation across SC projects in Qatar.
3. Continue to update and disseminate the whitelist of approved subcontractors and include further details on good practices, especially within Ethical Recruitment.

Pillar 2 – Reinforcing Ethical Recruitment

Recommendations:

1. Continue to require contractors to use a transparent, open tender process for the selection of recruitment agencies and monitor its efficiency in establishing Ethical Recruitment practices.
2. Continue to refine the benchmarks on the true cost of recruitment from key labour source countries. Compare contractors' actual costs with benchmarks to ensure that the employer pays all costs of recruitment.
3. Provide tangible support for contractors to build the capacity of their own staff and the agencies with which they contract, so that they understand and can implement Ethical Recruitment policies.
4. Consult civil society organisations and NGOs to gain intelligence concerning issues relating to recruitment in labour source countries, especially relating to corruption and kickbacks, so as to improve Ethical Recruitment outcomes.
5. Support main contractors to champion the rollout of improved policies and procedures at their subcontractors, using their own experience.
6. Introduce incentives and/or penalties for main contractors to drive compliance with recruitment requirements.
7. Consult and collaborate with MoADLSA where national measures are required to address common challenges in Ethical Recruitment.

Pillar 3 - Providing sustainable solutions to recurring problems

Recommendations

1. Continue to explore further targeted training programmes as an effective way to help ensure contractors' understanding and progression on high priority topics, given the strong results shown in pilots this year.
2. Continue to use influence to bridge knowledge gaps and to keep communication channels with contractors open and in use. In particular, continue to strengthen links between knowledgeable main contractors with good practices, and their subcontractors.
3. Promote the continued use of WWFs and further reiterate the importance of effective communication channels and social dialogue between workers and contractors, beyond grievance mechanisms. This should prompt a shared understanding of the importance of policies, procedures and practices and will also highlight high risk areas.
4. Extend and continue to promote the use of existing grievance mechanisms (including the SC hotline, WWFs and WWOs) to new contractors in the hospitality sector, as the construction phase draws to a close.
5. Engage with relevant government bodies to explore national measures to implement sustainable solutions for recurring problems at scale.



About the Authors

Rosey Hurst

Rosey founded Impactt in 1997 with the mission of improving the lives and livelihoods of workers worldwide by harnessing the positive power of global supply chains. She has since used her knowledge and experience of the developing world, corporate organisations and NGOs to develop diverse tools, solutions and services to create positive impacts for workers.

Ben Bostock

Ben joined Impactt in March 2019 and is a Principal Consultant. He focuses on forced labour investigations – which he has carried out across Europe and Asia as well as Qatar. Prior to this, he worked for five years at PwC within their Sustainability and Climate Change team. He has a double MSc in International Political Economy from Nanyang Technological University, Singapore, and the University of Warwick, and a BSc in Politics & Philosophy from the London School of Economics.

Barbara Dirnberger

Barbara is a Senior Consultant and joined Impactt in May 2016. She has a background in social research and human rights. Before joining Impactt, she led a research project on working conditions in South Africa, and worked for the Austrian Permanent Mission to the United Nations in Geneva and at humanitarian agency Care International. She has an MSc in Social Anthropology from University College London.

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Manuel is a Consultant and joined Impactt in January 2018, having previously spent two years working in the UK charity sector for the Calouste Gulbenkian Foundation. Prior to this, he worked as a Quality Assurance Analyst and Project Coordinator at Google. He began his career with an internship at Amnesty International in Lisbon, and has an MSc in Anthropology of International Development from Brunel University.

Introduction

Impactt's fifth Annual Report presents the results of our independent external monitoring of the Supreme Committee for Delivery & Legacy's (SC) Workers' Welfare Programme. The SC first appointed Impactt as External Monitor in 2016.

The SC is the body responsible for delivering the infrastructure and host country planning and operations required for the FIFA World Cup Qatar 2022™ (the Tournament). It aims to create an enduring legacy for the State of Qatar (hereinafter referred as "Qatar") and the world. 288 construction (and ancillary service) contractors and 17,641 workers⁶ fall under the remit of the SC.

The SC is committed to working with contractors to protect workers' health, wellbeing, safety and security, both by upholding its Workers' Welfare Standards⁷ and engaging in activities that go beyond WWS compliance.

The SC implements a four-tier auditing system against the WWS, comprised of contractors' self-audits (first party), comprehensive SC audits and inspections⁸ (second party), External Monitor audits (third party), and ad-hoc inspections conducted by the Ministry of Administrative Development, Labour and Social Affairs (MoADLSA)⁹. The SC's audit and inspection regime is complemented by joint Health and Safety inspections conducted by the SC and Building and Wood Workers' International (BWI). In addition to the joint inspections, the SC carries out health, safety and security inspections on a revolving monthly plan.

This four-tier audit system delivers multiple levels of oversight and transparency on conditions for workers. 100% of main contractors and subcontractors have quarterly second party audits. The results of joint inspections by the BWI alongside the SC are published annually¹⁰.

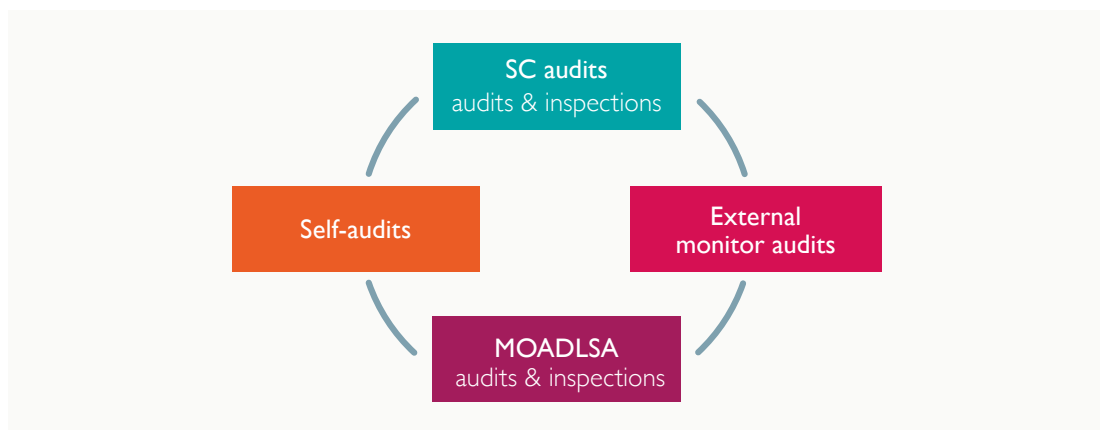


Figure 1: SC four-tier audit system

⁶ Data as of 31 December 2020 obtained from the SC.

⁷ The WWS are a set of specific, contractual requirements outlining how workers should be treated. They were updated to edition 2 in 2016 and complemented by an addendum ('Bulletin 1') in 2018. (For ease of reference, 'WWS' will refer to WWS ed. 2 plus Bulletin 1)

⁸ Please refer to the SC's Sixth Annual Workers' Welfare Progress Report to be released in April 2021 for further details

⁹ MoADLSA audits follow Qatari labour law rather than the WWS.

¹⁰ All reports are available on the SC's website: <https://www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency>, accessed 16 March 2021

Introduction to Impactt

Impactt is a consultancy firm, founded in 1997, specialising in delivering tangible and systemic improvements for workers in multiple industries and countries worldwide.

Driven by a mission to make what works for workers work for business, Impactt harnesses the power of supply chains to drive positive change by developing win-win solutions that work for businesses and workers. Since 2006, Impactt has reached over 2 million workers.

Drawing on both ethical and commercial expertise, Impactt's global teams include former workers as well as technical experts to bring a full understanding of complex supply chain challenges. Impactt helps companies across the supply chain to address pressing social issues, from modern slavery to empowering women. Importantly, Impactt 'bridges the gap' between diverse stakeholders to develop robust, long-term, holistic solutions.

Impactt's role is to monitor the compliance of contractors with the Workers' Welfare (WW) Standards via audits and worker satisfaction surveys, provide advice and publish an independent annual external compliance report.

The 2017 annual report

In our first annual report¹¹ (covering August 2016 – January 2017), Impactt recommended that the SC implement a three-year roadmap consisting of three pillars:

Pillar 1: Improve the effectiveness of efforts to drive compliance with the WWS.

Pillar 2: Prompt behaviour change in manager-worker interaction

Pillar 3: Collaborate for greater reach and impact.

The 2018 annual report

In the 2018 annual report¹² (covering January 2017 – January 2018), Impactt reported that the SC had made good progress in the following areas:

- Developing and beginning the rollout of a new method for reimbursement of recruitment fees where workers do not have receipts (the SC Universal Reimbursement Scheme).
- Improving worker representation and rolling out Worker Welfare Forums (WWF) among all main contractors.
- Ending the practice of passport retention.
- Supporting contractors in transferring workers to high quality accommodation.

11 <https://impacttlimited.com/wp-content/uploads/2017/01/SC-Annual-Report-Issue-3.2.pdf>

12 <https://impacttlimited.com/wp-content/uploads/2018/03/SC-Annual-Report-2018-Issue-6.2-digital.pdf>

The 2019 annual report

In the 2019 annual report¹³ (covering January 2018 to January 2019), Impactt reported significant progress in:

- Implementing the reimbursement of recruitment fees.
- Mandatory comprehensive medical health screening to identify and rehabilitate unfit and temporarily unfit workers.
- Increasing collaboration, with MoADLSA conducting a joint study with the ILO on the SC's work on WWF at ten contractors and participating in several subcommittees administered by MoADLSA and the ILO.
- Providing guidance on the design for WWF, conducting elections for worker representatives.
- Taking the lead in compliance with the new, temporary national minimum wage.
- Strengthening enforcement by sharing information on contractor non-compliance to inform enforcement activity.

Impactt provided the following recommendations for the SC to build on these gains:

Pillar 1: Improve the effectiveness of efforts to drive compliance with the WW Standards

Pillar 2: Prompt behaviour change in manager-worker interaction

Pillar 3: Collaborate for greater reach and impact

The 2020 annual report

In the 2020 annual report¹⁴ (covering January 2019 to January 2020), Impactt reported on the SC's progress against the Roadmap, and recommended a new Roadmap to further refine the SC's programme and deliver legacy outcomes.

Impactt reported:

- Significant progress in reimbursement of recruitment fees, worker representation, annual air ticket allowance and provision of repatriation flights.
- Widespread implementation of the innovative SC Universal Reimbursement Scheme (SCURS), with the SC calculating the total reimbursement by contractors to SC and non-SC workers could reach USD 30 million, paid across a payment period of up to 36 months.
- Rigorous monitoring and control by the SC, which resulted in Impactt identifying fewer priority areas – with the topics of 'worker representation', 'contracts and administration' and 'treatment' giving less cause for concern.

¹³ <https://impacttlimited.com/wp-content/uploads/2019/04/SC-Annual-Report-2019-Issue-2-digital.pdf>

¹⁴ <https://impacttlimited.com/wp-content/uploads/2020/07/IMPAA09-2020-Qatar-Annual-Report-v12-Digital.pdf>

Impactt also set out a new three-pillar roadmap to prioritise work in 2021:

Pillar 1 – Ensuring a positive legacy

1. Prompt wider adoption of the WWS, along with the SC's practices and innovations across the State of Qatar. This includes the Hospitality Working Group and other areas under the (ILO) Technical Cooperation Programme (TCP).
2. Continue to develop and disseminate a whitelist of approved subcontractors within the SC programme and Qatar.

Pillar 2 – Reinforcing Ethical Recruitment

1. Tighten requirements for Ethical Recruitment. Contractors should provide evidence of end-to-end management of recruitment processes.
2. Increase responsibilities of main contractors in conducting due diligence on any potential subcontractors.

Pillar 3 – Providing sustainable solutions to recurring problems

1. Increase awareness and understanding of contractors through targeted training programmes and ongoing monitoring of progress, in order to ensure full ownership of high priority topics.
2. Continue increasing enforcement of full SCURS payments across all contractors in collaboration with MoADLSA, particularly for demobilised workers.
3. Incentivise and improve dialogue between contractors and their subcontractors, beyond auditing requirements.
4. Monitor ongoing dialogue between workers and contractors to ensure workers understand new and existing policies, procedures and practices.

The 2021 annual report

This annual report sets out Impactt's findings from audits conducted during the period January 2020 – February 2021. It also reports on Roadmap progress and makes recommendations for further refinements of the SC's programme.

Context

The SC is a government entity tasked with leading Qatar's preparations for the 2022 FIFA World Cup including the stadiums, infrastructure and legacy. As part of building a positive legacy, the SC requires construction companies to comply with their Worker Welfare Standards (WWS). In 2020, SC projects employed more than 17,641 workers, or around 1% of the estimated 1.68 million migrant workers employed in the construction sector in Qatar. We note that, as the infrastructure construction phase nears completion and ahead of 2022, the SC's focus will increasingly move from construction to hospitality and tournament related services.

COVID-19 in Qatar

Since recording its first case of the COVID-19 virus in February 2020, Qatar has tested a total of 1,591,056 people, with a total of 167,888 positive cases recorded¹⁵. Daily cases hit a peak of 2,355 in May 2020, but have stayed below 500 per day since mid-July¹⁶. As of 9th March 2021, Qatar had recorded a total of 264 COVID-19-related deaths and 161,067 recoveries¹⁷. This represents a fatality rate of 0.16% – which is lower than the average global rate estimated at between 2-3%¹⁸. Commentators have argued that this low fatality rate is due to a combination of a young, relatively healthy population, the relative wealth of the nation, allowing for high testing rates¹⁹, and good investment in quality medical healthcare²⁰.

For further details on the SC's programmes related to COVID-19, please refer to the Sixth SC Annual Workers' Welfare Progress Report – to be released in April 2021.

New challenges related to COVID-19

This year, the COVID-19 pandemic has profoundly impacted all areas of life globally. Migrant workers across the world have been particularly vulnerable to health, financial and human rights impacts. However, despite the challenges, the SC's Worker Welfare Programme has proved effective in mitigating these impacts, while also continuing to address the fundamental criteria of the Roadmap.

From early in the crisis, the SC prioritised worker safety and awareness. This focus drove high levels of confidence among workers, with 100% of workers interviewed by Impactt reporting feeling protected from COVID-19 risks and satisfied with the protective measures put in place. Impactt's assessment shows similar compliance rates to the previous year (72% initial compliance, rising to 82% at follow-up audit) underlining the resilience of the social compliance system.

¹⁵ Correct as of March 9 2021, information via: <https://covid19.moph.gov.qa/EN/Pages/default.aspx>

¹⁶ Data provided by JHU CSSE, via Google

¹⁷ Ibid

¹⁸ <https://bmjopen.bmj.com/content/10/11/e043560>

¹⁹ <https://www.aljazeera.com/economy/2020/5/5/as-virus-deaths-grow-two-nations-stand-out-for-low-fatality-rate>

²⁰ <https://medicalxpress.com/news/2020-08-infections-deaths-qatar-tackled-covid.html>

COVID-19 and the measures established to combat it have impacted all stakeholders. While there was no total lockdown in Qatar, at certain times workers faced COVID-19-related safety measures. These affected freedom of movement outside their accommodation, the ability to conduct regular elections of worker representatives, and updates to Qatar Identity cards (QIDs). Workers were also unable to travel home for annual leave due to global travel restrictions. In some cases, COVID-19 control measures resulted in fewer opportunities to earn overtime pay. The SC focused on limiting the financial impact on workers, working with contractors to prioritise worker payments. Impactt's assessment found a 9% increase in compliance on wages and allowances this year. Workers' satisfaction with their income and progression has also increased by 4%, now at 52%.

The pandemic has also impacted contractors. COVID-19 risk mitigation measures have increased costs, the ban on international recruitment has disrupted plans and some contractors reported cash flow issues. Home-working measures affecting government offices disrupted some contractors' efforts to complete administrative requirements, such as health screenings or renewals of paperwork, at the required intervals.

Adopting a hybrid auditing approach

Impactt usually conducts four monitoring visits annually. This year, we made one standard visit (in January 2020) before the pandemic took hold, and two 'hybrid' visits in (November 2020) and (February 2021) during the pandemic, combining on-the-ground and remote approaches. The 'hybrid' approach used a reduced ground team of four people, plus eight to ten auditors and worker interviewers working remotely. The ground team supported the set-up of video calls, observed interviews to ensure transparency, and conducted inspections where digital copies were not available in time or transparency could not be ensured. We do not believe that this approach significantly impacted our diagnostic ability.

Given the safety measures outlined in this section, we categorised findings of this kind as observations rather than non-compliances where an issue was COVID-19-related and when we deemed the actions taken by the contractor to be reasonable in the context of keeping workers safe.

Our hybrid approach is further explained in 'Impactt's External Compliance Monitoring Programme' and 'Appendix 2: Impactt's Audit Approach'

Despite these challenges, compliance results remain broadly comparable to previous years.

Changes in National Law

Over the past year, the State of Qatar has made various changes to national law:

- Abolition of the 'No-objection certificate' (NOC) requirement: From September 2020, the requirement for workers to obtain an NOC from their employer was removed. This means that migrant workers who are subject to Qatar Labour Law no longer require their employer's permission to transfer to a new employer, allowing workers greater freedom of movement. This will present new challenges to contractors,

who can no longer rely on these certificates to ensure staff retention, while also creating opportunities for contractors to retain workers through positive incentives.

- Minimum wage: From March 2021, Qatar's new national minimum wage will come into effect. This is a basic monthly wage of USD275/QAR 1,000, with an additional USD137 for accommodation and USD82/QAR 300 for food, if neither is provided within the contract. As noted in last year's annual report, this will greatly benefit many migrant workers – although it could temporarily, but significantly increase contractors' labour costs – and those of their supply chains - whose contracts were determined before the wage was agreed.

Stakeholder views

Qatar's delivery of the Tournament continues to attract interest from a wide range of audiences, with a particular emphasis on human rights. Commentators note the importance of the new minimum wage²¹, the abolition of the NOC requirements²² and the Kafala system²³.

Stakeholders²⁴ have focused more closely on Ethical Recruitment issues in source countries this year. There has been widespread coverage of one recruitment agency in Nepal alleged to be using corrupt practices, which was subsequently shut down by the Nepali government²⁵. Further Nepali local news highlighted that recruits were making large payments to secure jobs in Qatar²⁶. While it is important to note that these cases do not directly relate to the SC, they provide insight into the context and principal challenges of implementing Ethical Recruitment through this key migration corridor into Qatar.

Human Rights Watch published a report detailing delayed, withheld and deducted wages across 60 employers of migrant workers in Qatar²⁷ (both within and outside of the SC's portfolio). Amnesty International also found problems with wages to be an ongoing issue at one SC contractor working at Al Bayt²⁸. Other commentators including the Guardian and FairSquare have continued to centre their focus on investigation procedures into the root causes of non-work-related deaths – looking at Qatar as a whole, rather than SC projects specifically^{29,30}.

21 <https://www.globalconstructionreview.com/markets/qatars-new-minimum-wage-law-necessitates-new-labour/>

22 <https://www.aljazeera.com/economy/2020/8/30/minimum-wage-no-noc-qatar-announces-changes-to-labour-law>

23 <https://www.hrw.org/news/2020/09/24/qatar-significant-labor-and-kafala-reforms>

24 Stakeholders include business-humanrights.org, The Nepali Times and The Diplomat (<https://thediplomat.com/2021/03/qatar-police-recruits-nepali-citizens-leaving-kathmandu-out-of-the-loop/>)

25 <https://www.business-humanrights.org/en/latest-news/nepal-govt-suspends-kathmandu-recruiters-after-they-allegedly-conducted-interviews-for-unverified-jobs-in-qatar/>

26 <https://www.nepalitimes.com/latest/qatar-police-recruitment-row-hits-nepalis/>

27 <https://www.hrw.org/report/2020/08/24/how-can-we-work-without-wages/salary-abuses-facing-migrant-workers-ahead-qatars>

28 <https://www.amnesty.org.uk/press-releases/qatar-100-world-cup-stadium-workers-not-paid-seven-months>

29 <https://www.theguardian.com/global-development/2021/feb/23/revealed-migrant-worker-deaths-qatar-fifa-world-cup-2022>

30 <https://fairsq.org/2021/03/10/qatar-and-fifa-should-respond-to-boycott-calls-with-action/>

Supreme Committee for Delivery & Legacy Workers' Welfare programme

Key programme milestones

Key milestones in the development of the SC Workers' Welfare Programme since 2016 are summarised in the timeline below (figure 2). For further details, please read the SC's full report, available on its website³¹.

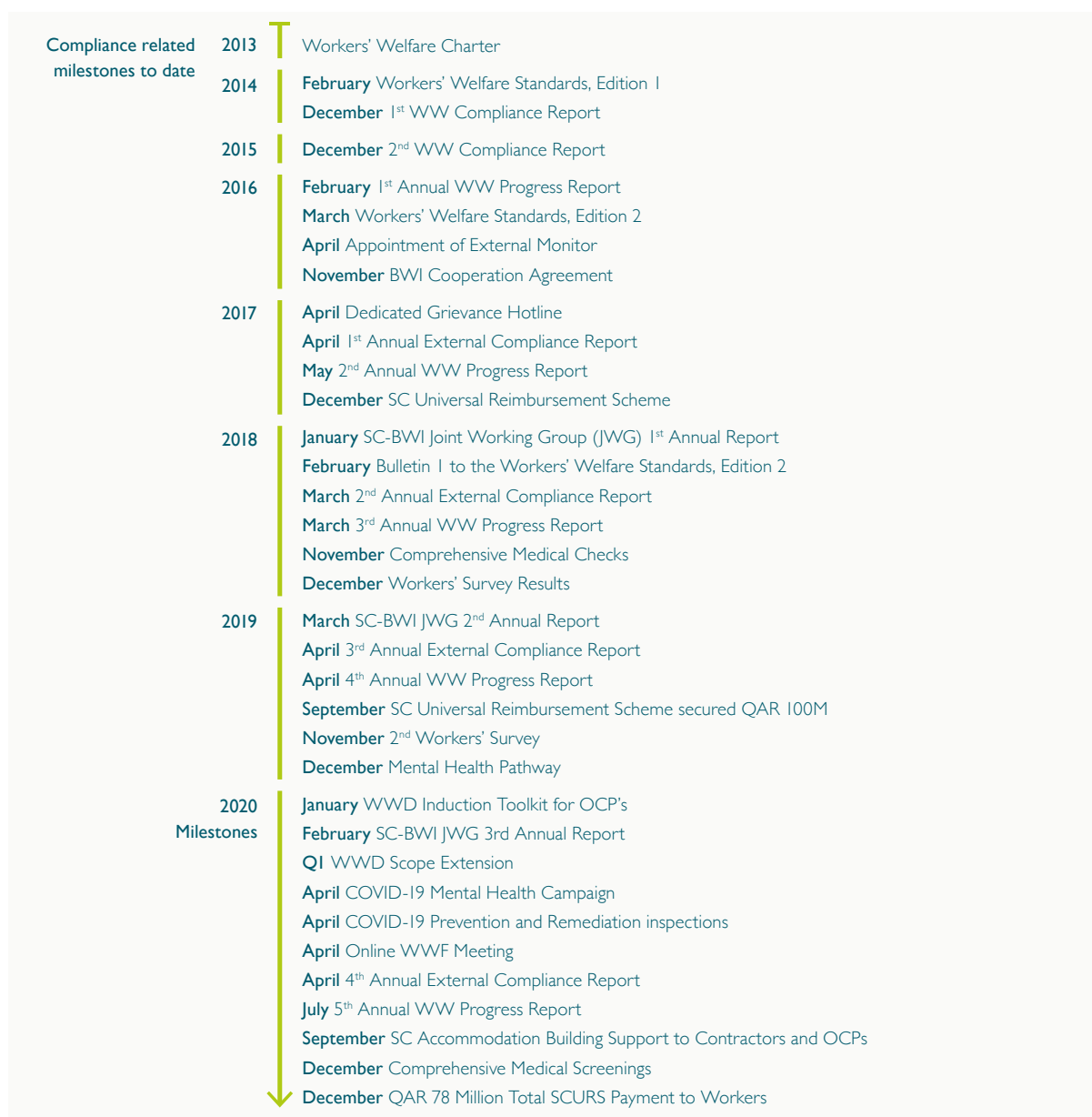


Figure 2 – Timeline of SC Workers' Welfare Programme's Key Milestones

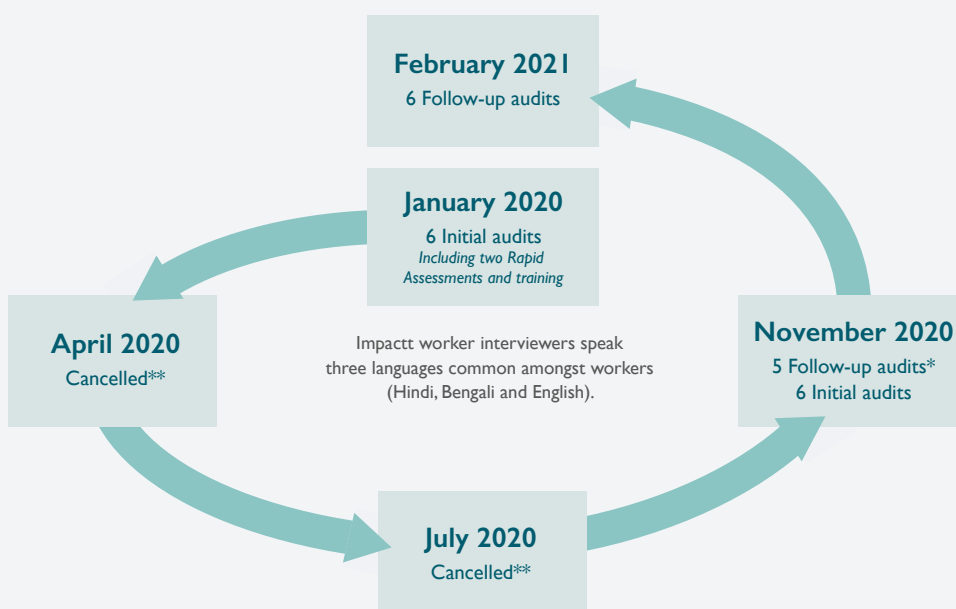
31 <https://www.sc.qa/en/news/sc-releases-fourth-annual-workers-welfare-progress-report->

Impactt's External Compliance Monitoring Programme

Scope of Impactt's Work

	2017	2018	2019	2020	2021
Contractors audited	10	14	24	22	12
Worker interviews	253	679	1109	951	394
Person days in the field	90	152	334	336	212

Auditing activities in scope of the annual report 2021:



SC's Scope contractors and tiers 288 Total contractors on SC projects			
Main contractors: 64	Impactt sample: 12 Contractors audited (2%)		
Tier 1: 176	Main contractors	Tier 1	Tier 2
Tier 2: 46	3 (4%)	4 (21%)	5 (11%)
Tier 3: 2			

SC's Scope workers and main nationalities 17,639 Total workers of 69 nationalities on SC projects				
Indian: 42%	Impactt sample: Worker interviews 394 (2%)			
Bangladeshi: 24%	Indian	Bangladeshi	Nepali	Other
Nepali: 19%	29%	27%	27%	17%
Other: 13%				

*One contractor initially audited in January 2020 was demobilised from SC projects by the time of the follow-up assessment, due to continued critical WWS non-compliances.

**April 2020 and July 2020 fieldwork were cancelled due to COVID-19-related travel restrictions.

- Due to the COVID-19 pandemic, two quarterly fieldwork visits (scheduled for April and July) were cancelled. Impactt resumed the fieldwork in quarter 4 using a hybrid methodology of on-site and remote auditing activities (as detailed above). Delivery of fieldwork totalled 212 person days this year – of which 116 person days were on-site, and 96 days were remote. This compares to an average of 274 person days in the field across the three previous years. Further details of the hybrid approach can be found in 'Appendix 2: Impactt's audit approach'.
- Due to the cancellation of both the April and July visits – the sample size was reduced by a total of 12 contractors compared to our usual sample size of 24 contractors. The assessment year was also extended by five weeks compared to usual – with the final follow-up assessments bridging January and February 2021.
- This year, Impactt piloted a model of rapid assessment coupled with tailored training at two of the contractors within scope in January 2020. The results are detailed in the introduction of the 'Findings' section.
- Given that many of the construction projects within the SC's portfolio will soon be complete, and the SC will be focusing more on hospitality and tournament related services, Impactt sampled:
 - One large main contractor of material relevance on the SC's current and past construction activities to assess worker welfare at the core of the SC's operation.
 - Three services contractors (i.e. two in catering and one in cleaning) to gain insight into challenges relevant to the SC's future scope.

*Please see Appendix 3 for further details.



Findings

This section sets out the overall results of Impactt's assessment of 12 contractors during the period January 2020 – February 2021, together with the results of the worker satisfaction surveys. For the purposes of this report, we refer to this reporting period as either '2021' or 'this year'.

The glossary of terms (see page 3) contains descriptions of the compliance terminology used below.

Compliance findings³²

Figure 3 below summarises this year's average compliance scores by topic area³³. The findings are organised by audit section, following the worker journey³⁴. Each of these sections covers relevant SC WWS and Qatar Labour Law³⁵ requirements.

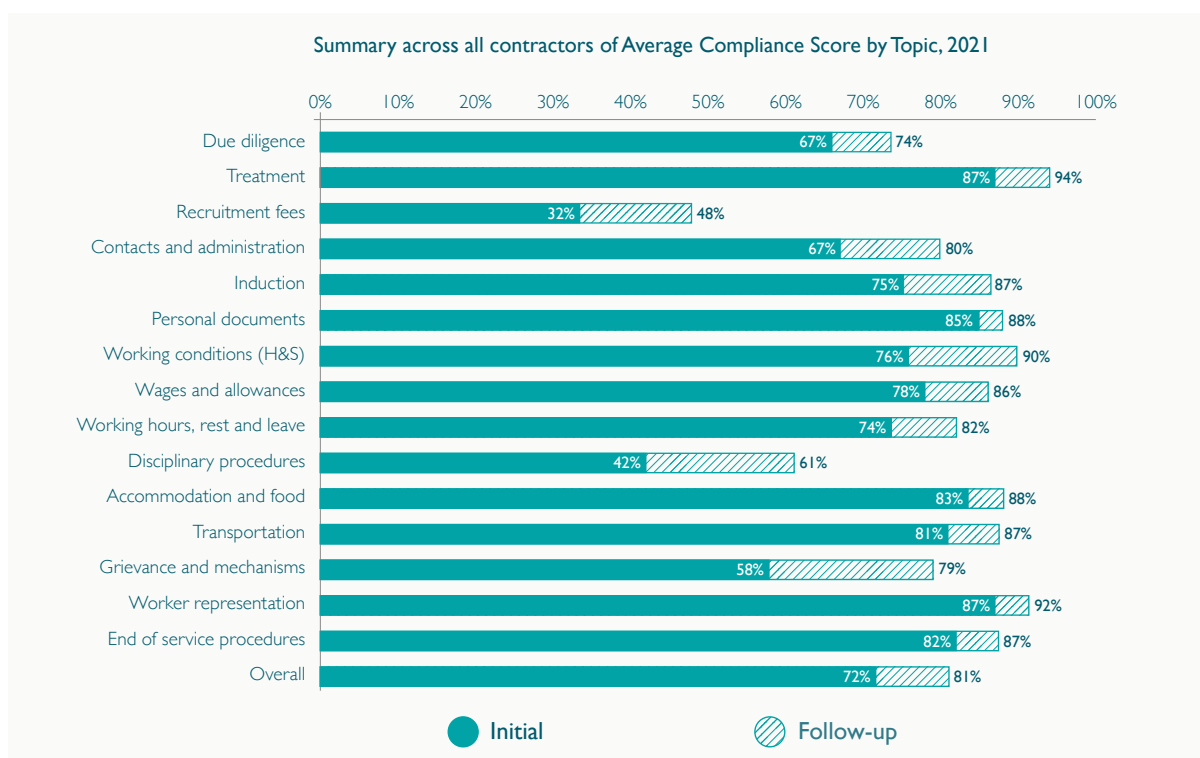


Figure 3 – Summary across all contractors of average compliance score by topic, 2021

The average overall initial audit compliance rate across the 12 contractors audited this year was 72%. During follow-up audit, the average score had increased to 81%

- ³² As is the case year on year, it should be noted that some variation may have resulted from Impactt refining the compliance checks. This usually takes the form of either merging or splitting checks to facilitate clearer discussions with contractors on root causes and possible solutions. Similarly, the types of contractors audited varies from year to year and therefore these compliance scores are not necessarily directly comparable to each of the previous years'.
- ³³ Please refer to Appendix 1 for details on the Topic Areas.
- ³⁴ Impactt's auditing methodology follows the "worker journey", i.e. a workers experience from recruitment to end of service. Please see Appendix two for more details.
- ³⁵ The scores are based on Impactt's own audit template, which contains key elements of the SC's WWS and Labour Law – but does not check contractors exhaustively on all WWS requirements or all Qatar Labour Law.

overall. This compares with an overall average initial score of 69%, and a follow-up of 82% in 2020. The continuity of these figures underlines the resilience of the SC and its contractors and their ability to maintain a strict focus on social compliance, amid the global COVID-19 pandemic.

Contractors scored well on worker treatment, personal documents, working conditions, wages and allowances, accommodation, transportation, worker representation and end of service topics, with a high average compliance score (76% and above) during initial audit.

Conversely, Ethical Recruitment and disciplinary procedures remained a cause for concern, with low average initial compliance (50% and below) during initial audits. In particular, average compliance scores on Ethical Recruitment decreased from 39% in 2018 to 32% this year at the initial stage.

However, these topics were also among the areas in which contractors made the greatest progress between initial and follow-up audit. Grievance mechanisms saw a 21% increase between initial and follow-up audit, disciplinary procedures saw a 19% increase, while Ethical Recruitment saw a 16% increase. The most progress on compliance in disciplinary procedures was made in 2021, with a 19% increase from initial to follow-up audit. Compliance scores for grievance mechanisms have remained broadly consistent over the last three years.

The least progress was made on average in the areas of personal documents, accommodation and food, and transport, worker representation and end of service procedures – this is mostly due to high compliance scores at initial audits. Personal documents saw a 3% improvement between initial and follow-up audit, while accommodation and food, worker representation and end of services all saw a 5% improvement. While compliance scores in personal documents are relatively high, they have nevertheless decreased over the last three years.

Contractors were able to close out or make progress on 70% of issues³⁶. This is higher than last year (63%) and the same as 2019, highlighting strong progress by contractors, despite the challenging COVID-19 landscape.

Severity of issues

Impactt raises non-compliances as 'minor', 'major' or 'critical' depending on the severity and scale of impact of the issues on workers. Overall, Impactt raised a lower number of total issues per contractor (53 in 2020, 47 in 2021). Impactt found the same number of major and critical non-compliances per contractor as last year (i.e. 11 major and 1 critical on average) and 24% fewer minor non-compliances.

The risks posed by COVID-19 and subsequent mitigation measures taken by contractors have increased the number of observations e.g. social distancing, possible impacts on freedom of movement etc.). (See the 'Context' section for details on rating COVID-19 related issues). We found 22% more observations, including an increase from 1 critical to 1.5 critical observations per contractor, on average.

³⁶ This excludes issues that could not be verified or where the contractor was 'unable to show improvement' / 'unable to verify' due to factors outside their control (e.g. no new recruitment to demonstrate compliance on issuing offer letters). We considered non-compliances and observations raised during initial audits only; new issues raised during follow-up audits are excluded as Impactt does not carry out second follow-up audits to verify their status. Any such issues identified are highlighted in reports provided to both the contractor and the SC for their further action and enforcement. This year we found 35 such issues.

Contractors may be recorded as having a high rate of severe issues against certain topics, regardless of their overall compliance rate. The topics with the highest severity³⁷ this year were:

- Personal documents
- Ethical Recruitment
- Wages and allowances
- Working hours
- Working conditions

	2018 Report		2019 Report		2020 Report		2021 Report	
	Average # issues per contractor	Closed & progress made (%)	Average # issues per contractor	Closed & progress made (%)	Average # issues per contractor	Closed & progress made (%)	Average # issues per contractor	Closed & progress made (%)
Contractors Audited	24		24		22		12	
Critical NCs ³⁸	1.16	36%	0.75	100%	0.95	61%	0.92	56%
Major NCs ³⁹	7.68	51%	11.2	74%	10.73	74%	11.17	78%
Minor NCs ⁴⁰	21.84	62%	32.41	69%	32.45	56%	24.58	65%
Total NCs	30.68	58%	44.38	70%	44.14	60%	36.67	69%
Critical OBs	0.89	35%	0.71	88%	1.05	80%	1.58	79%
Total OBs	7.89	57%	11.79	75%	8.18	74%	10	76%
Total issues	38.58	57%	56.16	71%	53.45	63%	46.67	70%
Total critical issues	2.05	36%	1.46	94%	2	72%	2.5	70%
Key								
≥0≤25%		≥26≤50%		≥51≤75%		≥76≤100%		

Table I - Overall follow-up improvement by year

37 The severity level is calculated using the proportion of critical and major non-compliances, and critical observations, relative to the total number of non-compliance. Severity relates to the level of risk to workers or the size of the gap between current practice and legal or WWS requirements.

38 Imminent risk to workers' safety or risk to life and limb, a significant breach of employees' human rights; a recurring major issue that has not been addressed, or an attempt to pervert the course of the audit.

39 A material breach of the SC WWS or Qatar Labour Law which is not a minor.

40 An occasional or isolated problem, an issue that represents low or limited risk to workers or those on site, or a policy issue or misunderstanding.

The number of issues per contractor (both non-compliances and observations) raised has declined this year, on average. However, the total number of critical issues raised per contractor is the highest it has been over the four years to date. This can be attributed to the following factors:

- The high proportion of subcontractors audited⁴¹ has meant a high proportion of major and critical issues – as globally labour issues are more commonly seen among lower Tier suppliers. Our increased focus on lower tiers is largely due to our monitoring having already covered the majority of main contractors. Two Tier 2 contractors in this year's sample are responsible for 82% of critical non-compliances. These two contractors employ 210 workers on SC projects. In comparison, no critical non-compliance was found at main contractors employing 955 workers across SC sites.
- Contractors undertaking service functions (i.e catering and cleaning) had an average of 14 major and critical non-compliances, compared to 12 at construction contractors. The severe issues at service providers audited were mostly observed in personal documents, recruitment fees and wages and allowances.

This year, many issues were marked as 'unable to show improvement. This is largely related to issues where the contractor was unable to provide a full circle of evidence showing that new policies had been used for newly recruited workers. This was due to a lull in recruitment related to COVID-19 (See 'Context', and 'Appendix 2').

Rapid assessment and Training model – pilot results

This year, Impactt piloted a model of rapid assessment coupled with tailored training, at 2 of the contractors within scope. The rapid assessment methodology included all aspects of the usual audit process – but omitted only the accommodation and transportation section due to the ongoing centralisation of these issue areas. In lieu of these inspections, tailored training sessions were provided to these contractors following the initial audit results – which focussed in particular on their topics with lowest compliance scores. Mentoring calls were also arranged with both contractors between initial and follow-up audits.

The two contractors scored 76% and 80% at initial audit – but were both able to achieve a compliance score of 91% at follow-up. This shows an improvement in compliance of 15% and 11% respectively – both of which are higher than the average improvement rate of 9% this year.

41 75% of contractors audited this year were tier 1 or below, compared with 74% last year, 70% in 2019 and 58% in 2018

Satisfaction

Despite COVID-19 and related lockdown and safety measures (as noted in the 'Context' section), we have seen a continued increase in worker satisfaction this past year – from 4.0 to 4.3 out of 5, up from a score of 3.0 in 2018.

- Of 394 survey respondents, 79% reported being satisfied (4) or very satisfied (5) with their job.
- 30 out of the 32 workers (8%) who reported being either dissatisfied (2) or very dissatisfied (1) were employed at one contractor.

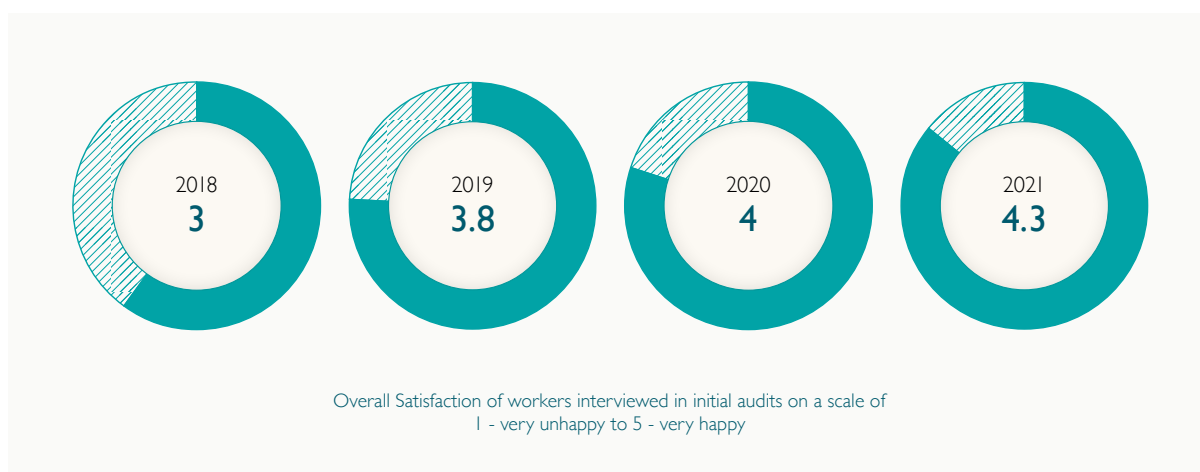


Figure 4 — Overall satisfaction of workers interviewed in initial audits on a scale of 1 - very unhappy to 5 - very happy

As usual, this year, workers highlighted stable income and safe conditions as most important in overall job satisfaction. Across the sample, satisfaction with safety and respect remained high (93%) and satisfaction with income increased from 48% to 52%.

- **Wages and allowances:** More workers than ever (68% compared to 56% last year and 45% in 2019) report they earn enough each month to pay for their families' basic needs. 68% of workers surveyed were already receiving the new minimum wage – before it officially came into force in March 2021. 75% were receiving SCURS payments as compensation for recruitment fees they had paid. The survey data reveals that SCURS increases workers' satisfaction by 9-11% when workers are aware that this allowance is a recruitment fee reimbursement. This year, 80% of recipients (compared to 29% last year) were aware of the reason for SCURS payments. For further information on SCURS, please see the 'Recruitment Fees' section.
- **Safety:** 100% of workers felt safe at work and at their accommodation. In particular, workers commented that they felt well protected from work accidents and COVID-19. Their safety concerns, if raised, were for their families in their native countries, where there were typically fewer effective measures to prevent the spread of COVID-19.
- **Respect and fair treatment:** Workers' sense of safety correlated strongly with feeling treated with respect. At 11 out of 12 contractors, all workers felt respected. This year 94% felt they were treated fairly and equally - a continuous increase since the 51% who felt this way in 2017. This correlates strongly with increases in audit compliance in treatment, and worker representation.

- **Working on an SC project:** Workers who had previously worked on non-SC projects continued to highlight their comparative satisfaction on SC projects - citing better workplace safety, accommodation standards, higher pay and more entitlements.

Laksmi⁴² came to Qatar 4 years ago, having previously worked in Malaysia and Dubai. He is glad to be involved in stadium construction as he earns a good wage through working 220 hours per month. He appreciates the good safety standards, and the behaviour and respect everyone on site shows. He likes his job because his wage is paid on time each month and the managers at his company are friendly, respectful, and accommodating.



⁴² Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random

Severity and prevalence by topic area

This year, our analysis of severity⁴³ and prevalence⁴⁴ of issues has resulted in the same five priority areas as last year (Figure 5). It is important to note that the compliance score with a topic area does not necessarily correlate with its severity or prevalence⁴⁵.

Please see detailed findings for all priority topics in the next sub-section.

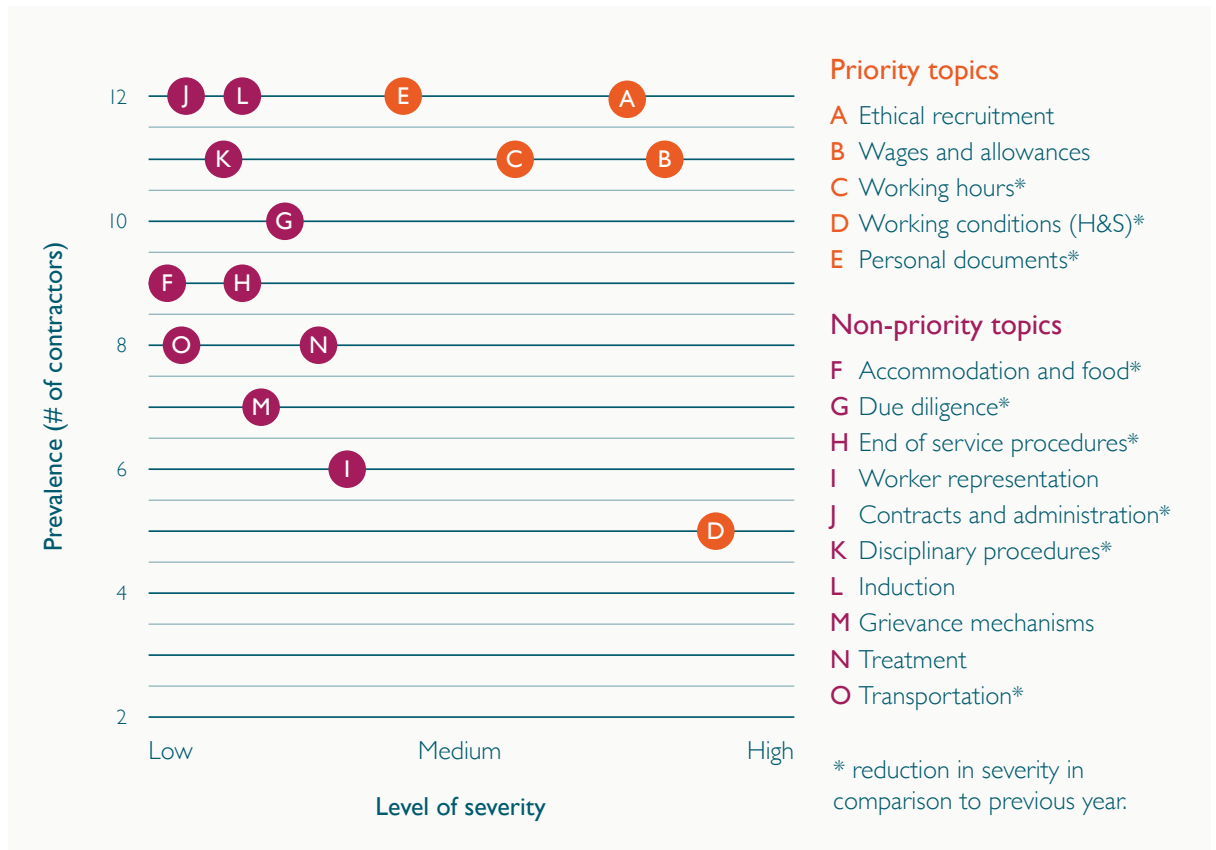


Figure 5 – Priority topics

⁴³ The severity level is calculated using the proportion of critical and major non-compliances as well as critical observations, relative to the total number of non-compliances. Issues which were closed at follow-up are omitted. Severity relates to the level of risk to workers or the size of the gap between current practice and legal or VWS requirements. It does not relate to the overall number of non-compliances within a topic area.

⁴⁴ Prevalence refers to the number of contractors identified as having at least one issue in a particular topic area. This also does not relate to the overall number of non-compliances within a topic area.

⁴⁵ Given the above two footnotes, it is possible to have a high overall compliance rate, but also to have high prevalence and/or high severity in a topic area.

A. Ethical Recruitment⁴⁶

WW Standards requirements

The WW Standards requires contractors to:

- Reimburse workers for recruitment or processing fees if the worker is able to provide proof that they have paid such fees (WW Standards 6.9).
- Stipulate that the contractor is responsible for paying all recruitment and processing fees in their contracts with recruitment agents (WW Standards 6.4).
- Obtain a signed statement from the Recruitment Agent immediately after the placement of Workers by a Recruitment Agent, stating that the Recruitment Agent has complied with the requirements of WW Standards 6.4 (WW Standards 6.6).
- Complete a new starter checklist with new workers, covering whether they paid any recruitment fees (WW Standards 6.10).
- Only use the services of a Recruitment Agency that is validly registered with MoADLSA (WW Standards 6.3).
- Conduct a 'new starter checklist' with workers within the first month, which includes a question as to whether the workers have paid any recruitment fees (WW Standards 6.10).

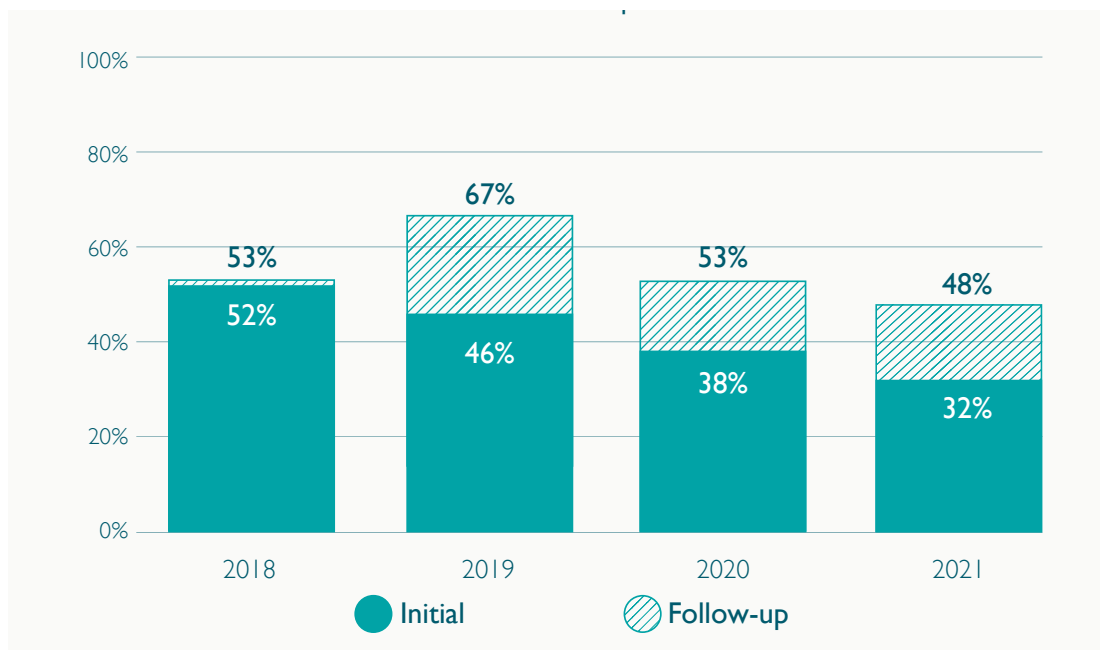


Figure 6 – Ethical Recruitment: Compliance

⁴⁶ This topic was formerly titled 'Recruitment Fees' in previous reports. It has been renamed to reflect the wider mandate which is covered within this topic.

Ensuring zero cost recruitment of migrant workers remains a significant global challenge – although reimbursement of historic fees paid is becoming more widespread. The SC's Universal Reimbursement Scheme (SCURS) – which encourages contractors to provide reimbursement for such fees and related charges without requiring proof of payment – has been in operation for more than three years now. The SC's legacy in driving recruitment fee repayment should not be underestimated. In particular, many of the principles underlying SCURS have been adopted and refined by other sectors and in other geographies. The WW Standards require contractors to take certain actions towards Ethical Recruitment, as noted above. The challenge now is to go beyond these standards and work more closely with labour source country governments and the extended labour supply chain to ensure that the payment of recruitment fees and related charges is prevented from the outset.

Compliance findings

Ethical Recruitment is still the highest priority topic, and compliance results at initial audit continue to decline year on year. Impactt found issues related to Ethical Recruitment at all 12 of the contractors audited at initial stage. There was also a higher level of severity – with major issues identified at 11 of these 12 contractors. This was due in part to a high proportion of audited Tier 1 and 2 subcontractors and service providers (similar to last year's sample) found to have less robust policies and practices⁴⁷. Importantly, 11 out of 12 of these contractors are participating in SCURS and were reimbursing workers without requiring proof of payment.

Impactt identified the following non-compliances this year:

- At initial audit, 7 of 12 contractors did not have robust processes to check whether workers had paid recruitment fees and related charges during their recruitment journey. Six contractors subsequently took action to introduce new starter checklists and interviews as part of their standard onboarding process, and at follow-up, current workers confirmed they had been asked about their fees. At the remaining contractor, this issue remained open, as all workers interviewed reported not having been asked about paying recruitment fees and related charges.
- 5 of the 12 contractors were unable to demonstrate that they paid for the relocation costs of workers at initial audit. One contractor was able to close this issue by providing additional evidence at follow-up.
- 7 of 12 contractors did not have robust processes for verification of receipts and reimbursement.
 - At follow-up, new, robust processes had been introduced at 6 of these contractors.
 - At another contractor, one worker showed proof of recruitment fee payments. This contractor did not pay SCURS, and did not make the workforce aware that they could be reimbursed for these fees upon providing proof of payment⁴⁸
- At one contractor, workers were experiencing deductions from their pay for their own

⁴⁷ This year, 75% of contractors audited were Tier 1 or below. This is comparable to last year's figure of 74%

⁴⁸ Where SCURS is paid - in instances where the proof of payment is higher than the total SCURS received, the SC requires contractors to investigate and repay workers this higher amount. We did not find such an instance during this year, as this worker was the only one to have any proof of fee payments.

sponsorship fees. The contractor rectified this issue before the follow-up audit and is working towards eliminating this practice.

Analysis of recruitment fees and related costs

The proportion of workers recently recruited to SC projects who report paying fees and related costs⁴⁹ has steadily decreased between 2018 and 2021. We spoke to 125 'newly recruited' workers who had been recruited since January 2019⁵⁰. 85 (68%) reported paying recruitment fees and related costs, down from 71% (2020), 83% (2019) and 96% (2018). Of these workers, only 1 worker (1%) reported having any form of proof of payment.

The average amount that workers report having paid has instead decreased this year to USD 1,333, as shown in Figure 7. The decrease in amounts reported is due in part to a reduced proportion of Bangladeshi workers within the sample size (18% this year compared with 31% in last year's recruitment fee survey), who pay the highest fees on average.

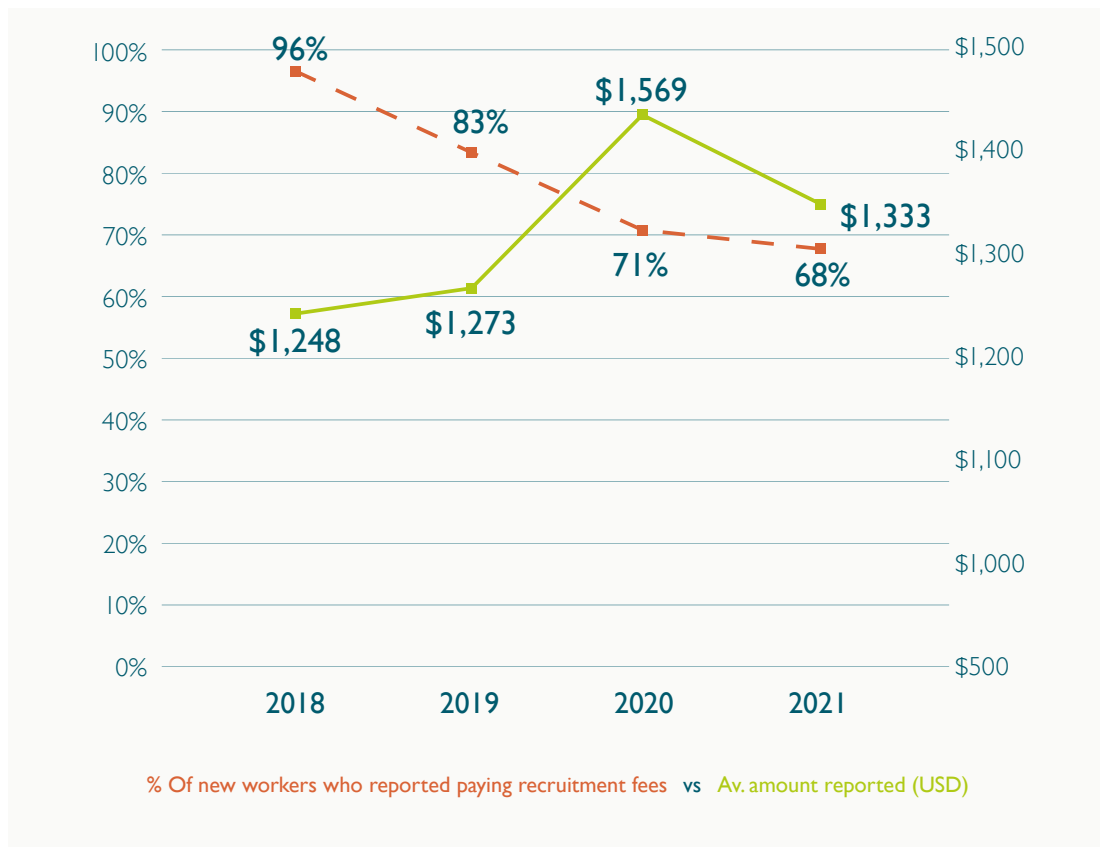


Figure 7 - Recruitment fees and related costs – overall percentage of workers reporting payment, versus average amount

⁴⁹ For a full definition of what this entails, please refer to the ILO: https://www.ilo.org/global/topics/labour-migration/publications/WCMS_761729/lang-en/index.htm

⁵⁰ It is important to note that – as detailed in the 'Context' section – there has been no recruitment undertaken since circa March 2020, and therefore these results relate to recruitment undertaken before this date.

The below graph shows the average amount of fees and related costs reported by each nationality, as well as the percentage of workers from each nationality reporting paying any kind of recruitment fees and related costs.

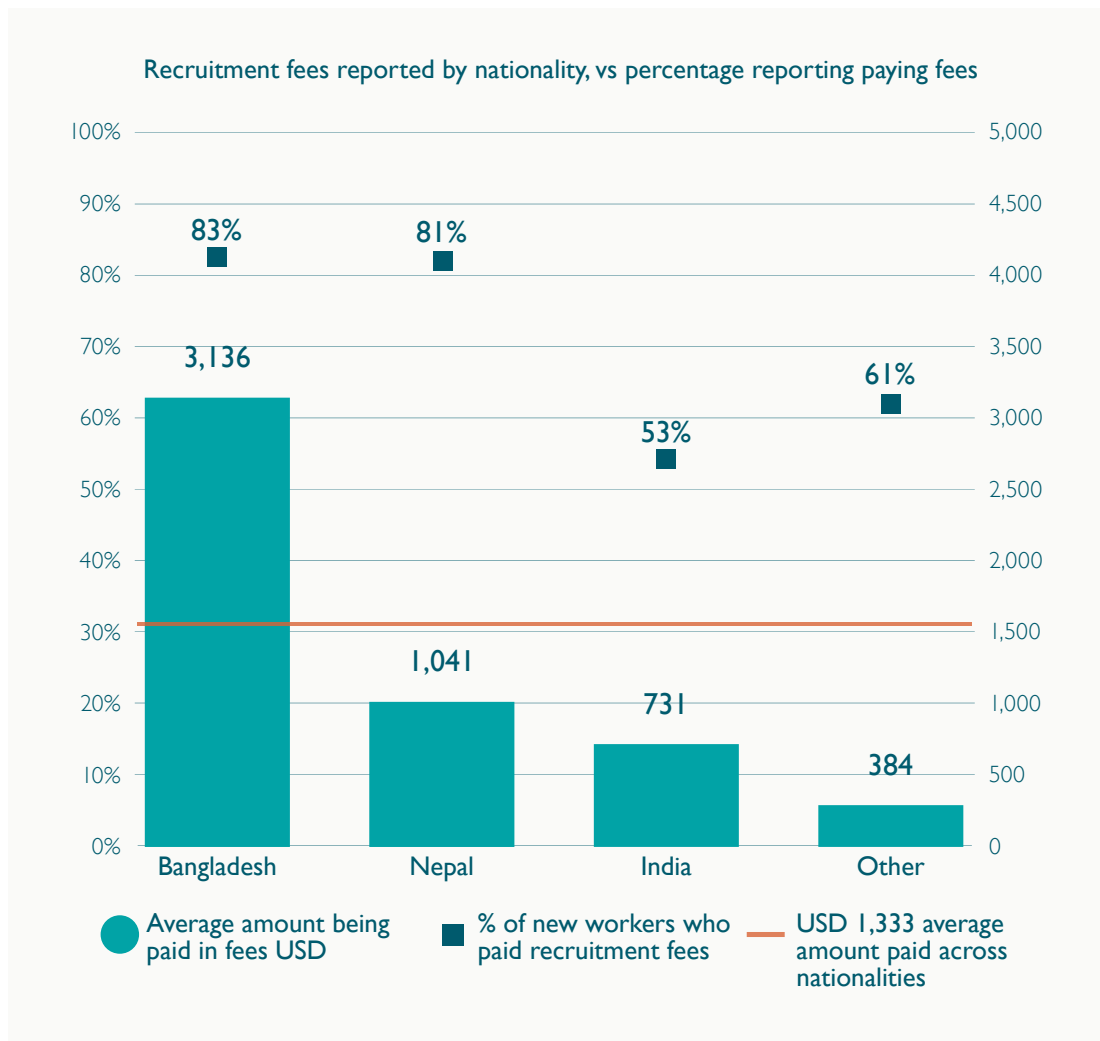


Figure 8 - Recruitment fees and related costs reported by nationality, vs percentage reporting paying fees

Bangladeshi workers continue to report the highest recruitment fees and related costs. This year's sample shows an 8% increase for these workers to USD 3,136 – up from USD 2,901 in our previous annual report. Nepalese workers reported an even higher increase of 19% on average – up to USD 1,041 from USD 874 in our previous annual report.

This highlights an important challenge in tightening requirements on Ethical Recruitment within these two labour source countries in particular, where fee payments not only persist – but are increasing year-on-year. Nevertheless one contractor demonstrated successful, almost fee-free recruitment (see box below).

Rama joined his employer in July 2014. He paid his village broker in Bangladesh USD 3,500 for getting a visa, flight ticket, medical examination and training to be able to come to Qatar. Rama's father is unwell and he is the only son. His mother and sister do not earn an income. To help cover his family's basic living needs, he sends them a minimum of USD 200 every month. He currently earns a basic wage of USD 220, – which has remained constant since 2014. Because of the additional allowances [SCURS] he has recently started receiving, he can now start paying back the loan he took out to cover the broker's fees.

SCURS – Commitment versus action

As of February 2021, the SC had received commitment letters from 259 contractors agreeing to pay SCURS to workers, even beyond demobilisation from SC projects. The monthly average payment towards SCURS comes to approximately 13% of workers' basic salary, and the repayment schedule committed to ranges from 12 to 36 months. The amount expected to be paid (with defaulted payments removed) to 30,748 SC workers and 18,066 non-SC workers currently stands at USD 28,200,000. MoADLSA has attested 209 of these SCURS commitment letters. Once attested, MoADLSA is able to take action against any companies in cases where they fail to adhere to these commitments.

The SC reports the 259 contractors have paid a total of USD 21,400,000 to workers in recruitment fees reimbursement as of December 2020. This is based on the SC's audits and inspections and includes only SCURS payments at contractors who the SC verified were paying the committed SCURS amount to all eligible workers. The SC has not included SCURS payments due beyond contractors' demobilisation of workers from SC projects in their calculation.

This year we verified the commitment letters relating to the 11 contractors paying SCURS, which we have audited this year. Of these, 10 of the 11 contractors are fulfilling their commitments. The remaining contractor was found to be paying monthly instalments to its workforce at inconsistent rates – with some workers being paid only half the amount to which the contractors had committed to.

While 9 of these 11 contractors paid their workforce after demobilisation from SC projects until reaching the agreed reimbursement amount, two did not. As highlighted in 2020⁵¹, workers remain on SC projects for an average of six months and may therefore only receive a small portion of the total intended SCURS payment. This represents a significant improvement from last year's audits – which found just 4 contractors (from the larger sample of 22) were paying SCURS beyond demobilisation.

Tackling recruitment issues in labour source countries

This year, no issues remained open regarding the use of unregistered recruitment agencies. With a view to preventing fees being paid and in compliance with Qatar Labour Law – the SC requires contractors to use only MoADLSA-approved recruitment agencies, establishing contracts containing Ethical Recruitment clauses.

51 See page 29: <https://impacttlimited.com/wp-content/uploads/2020/07/IMPA09-2020-Qatar-Annual-Report-v12-Digital.pdf>

Despite this, the prevention of recruitment fee and related charges payments remains a significant challenge. 68% of newly recruited workers still report paying fees. This suggests that the root cause of the issue – in labour source countries - is not yet being adequately addressed.

During the remaining period before the Tournament in 2022, the SC could forge an important legacy by demonstrating further improvements in Ethical Recruitment. See the 'Recommendations' section of this report for key steps forward for the next year, in particular 'Pillar 2: Reinforcing Ethical Recruitment'.

B. Wages and allowances

WW Standards requirements

Qatar Labour Law and the WW Standards require contractors to:

- Pay overtime on a regular working day at a premium rate (Article 74).
- Pay workers on a rest day at a premium rate and provide a compensatory day off (Article 75).
- Provide workers with return air travel expenses to nearest international airport at home country of workers. (WWS 9.7).
- Provide workers with payslips that contain prescribed key content (WWS 10.4).
- Pay workers in accordance with the WPS.
- Provide workers with free food, accommodation, transportation and healthcare.
- Recover salary advance/loan (contractor may not charge interest and can recover max. 10% of wage per month) (Article 70).

[Note: At the time of Impactt's audits, the national non-discriminatory minimum wage had not yet gone into effect. Therefore, the WWS go beyond national law.]

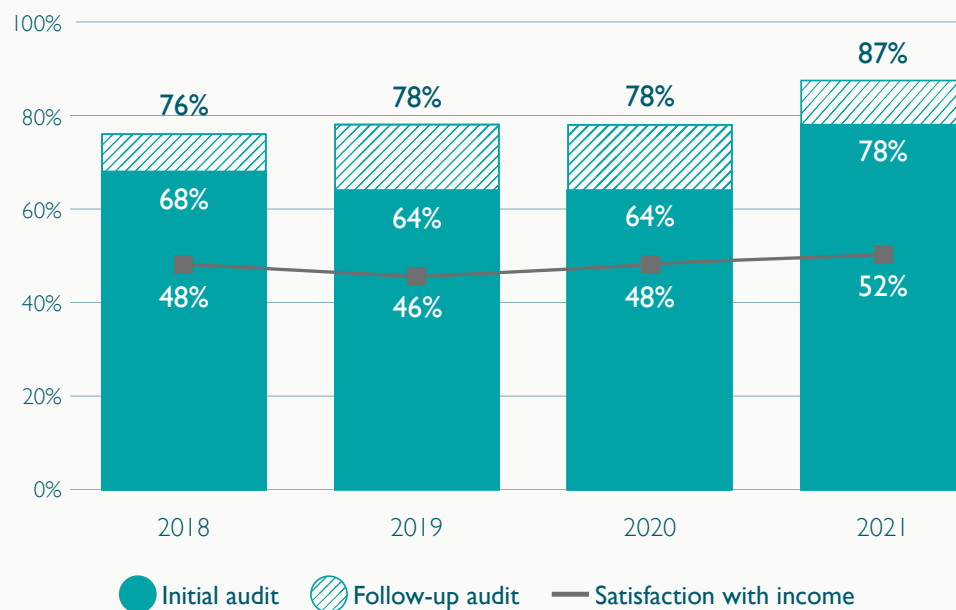


Figure 9 - Wages and allowances: Compliance vs. Satisfaction with income

Compliance in wages and allowances has increased by 9% at follow-up audit, now standing at 87%. Workers' satisfaction with their income and progression has also increased by 4%, reaching 52%.

Wages are a priority for workers, and there is a strong correlation between increased income and general satisfaction. Workers experienced increased income satisfaction this year due to:

- The advanced implementation of the new minimum wage at 5 out of 6 contractors initially audited in Q4 2020.
- Workers are more commonly aware of SCURS being a recruitment fee reimbursement (+51% increase in awareness since last year). This increases worker's satisfaction with their income by 9-11%, compared to them simply receiving SCURS payments without knowledge of its purpose.

68% of workers surveyed reported earning enough to cover their families' basic needs, including education for their children and medicine for their elderly family members. This represents a steady increase over the years, from 45% in 2018.

Rudra was planning to get married in 2020, however, due to Covid-19, his marriage has been postponed. Because he is working on an SC project, he gets allowances like SCURS and air ticket allowance in addition to his basic wage. He is also provided with free food, as well as a further food allowance. This is helping him to save money for his marriage - and he has even had a gold ornament made for his future wife. He is therefore pleased to be working at this contractor.

MoADLSA took an important step forward by announcing a non-discriminatory minimum wage⁵² that will come into effect in March 2021. The removal of the No-Objection Certificate (NOC) requirement also allows workers more flexibility and the opportunity to change jobs, as detailed in the 'Context' section.

The new minimum wage stipulates a minimum wage of USD 274 per month, plus USD 136 per month for accommodation and USD 82 per month for food, if neither is provided. MoADLSA is supporting contractors to update employment contracts where workers earn less than the amount established by the new law. This will come into effect in March 2021. Last year, our report found that 10 contractors had issues related to payslips – with 6 not issuing these at all, and 4 issuing them inaccurately or unclearly⁵³. In comparison, no critical issues were raised in this regard in 2020, with only 1 major non-compliance observed, which had been resolved by the follow-up audit.

⁵² <https://www.gco.gov.qa/en/top-news/adlsa-statement-minimum-wage-noc/>

⁵³ See, for example our previous annual report (2020), page 36

Compliance findings

Delayed wages

Impactt raised one critical non-compliance at one contractor related to delayed wage payments:

- One contractor was found to be paying workers several weeks late, on a regular basis, and, in some instances, more than one month late. This issue remains open, as salaries had not been paid by the time of follow-up audit⁵⁴.

Impactt raised major non-compliances related to delayed wage payments at 3 contractors:

- One contractor was consistently paying workers' salaries after the 10th of the following month. The contractor was paying overtime hours one month late. At follow-up audit, Impactt verified that the previous three months had been paid on time for both overtime hours and wages, and this issue was closed.
- One contractor did not pay workers' salaries on time. Impactt verified that August 2019 salaries were paid after 23rd September 2019. The SC has since suspended all operations with this contractor, and therefore no follow-up audit was conducted.
- One contractor had not paid workers for 10 days of overtime hours worked at the time of the initial audit. This issue remains open, as during follow-up we verified that a portion of overtime hours worked continue to be paid one/two months in arrears.

Loans

Impactt found one critical non-compliance related to loan interest rates charged to workers:

- One contractor was found to be charging interest on advance loans to a worker. Only interest-free advance loans are permitted by the WWS. At follow-up audit, this issue was not closed because the worker had not been reimbursed the total amount charged to him in interest.

Impactt found major non-compliances related to loan repayments at 7 contractors where the contractor has deducted repayments of more than 10% of basic wage per month:

- 2 contractors had resolved this issue by follow-up audit.
- 1 contractor did not change its policy and therefore this issue remained open at follow-up audit.
- At 2 contractors, despite changes in policy, workers still reported experiencing deductions of more than 10% of their basic monthly salary, and therefore these non-compliances remained open at follow-up audit.
- A further 2 contractors had updated their policy but due to the absence of any new recruits, we were unable to verify whether the policy had been implemented (as loans tend to be offered to new joiners)

⁵⁴ Please see the SC's Sixth Annual Workers' Welfare Progress Report section on Salaries and Benefits – to be released in April 2021 – for details on the SC's activities engaging with contractor for on-time payment.

Impactt raised one critical observation related to undocumented cash payments:

- One contractor recorded working hours manually. 8 of 14 workers interviewed reported having worked on Fridays and accruing additional overtime hours, but there is no record of this on the WPS⁵⁵. Workers reported being paid in cash for this time. In addition to the potential for excessive working hours this lack of transparency presents a health and safety risk - meaning workers could work illegally long hours, putting themselves and others at risk.

⁵⁵ There was no follow-up audit carried out at this contractor and therefore issue has no assessment of potential progress made.

C. Working hours, rest and leave

WW Standards requirements

The WW Standards require that contractors follow Qatar Labour Law with respect to working hours (WW Standards 9.8). Qatar's Law No 14 of 2004 stipulates:

- Working hours are a maximum of 8 hours per day and 48 hours per week (Article 73).
- Working hours shall include a minimum of one hour's rest per day (Article 73).
- Ramadan working hours shall not exceed 36 hours per week, 6 hours per day (Article 74).
- Overtime can be worked up to a maximum of 2 per day at a total of 10 hours total hours of work per day and shall be compensated at a premium rate (Article 74).
- Workers shall not work more than two consecutive rest days, with the exception of shift workers (Article 75).

The WW Standards 9.5 requires contractors follow Qatari Labour Law No 78 regarding public holiday. This states that the employer must provide the following 10 public holidays:

- Eid Al-Fitr: 3 days; Eid Al-Adha: 3 days; National day: 1 day; Specified by employer: 3 days.

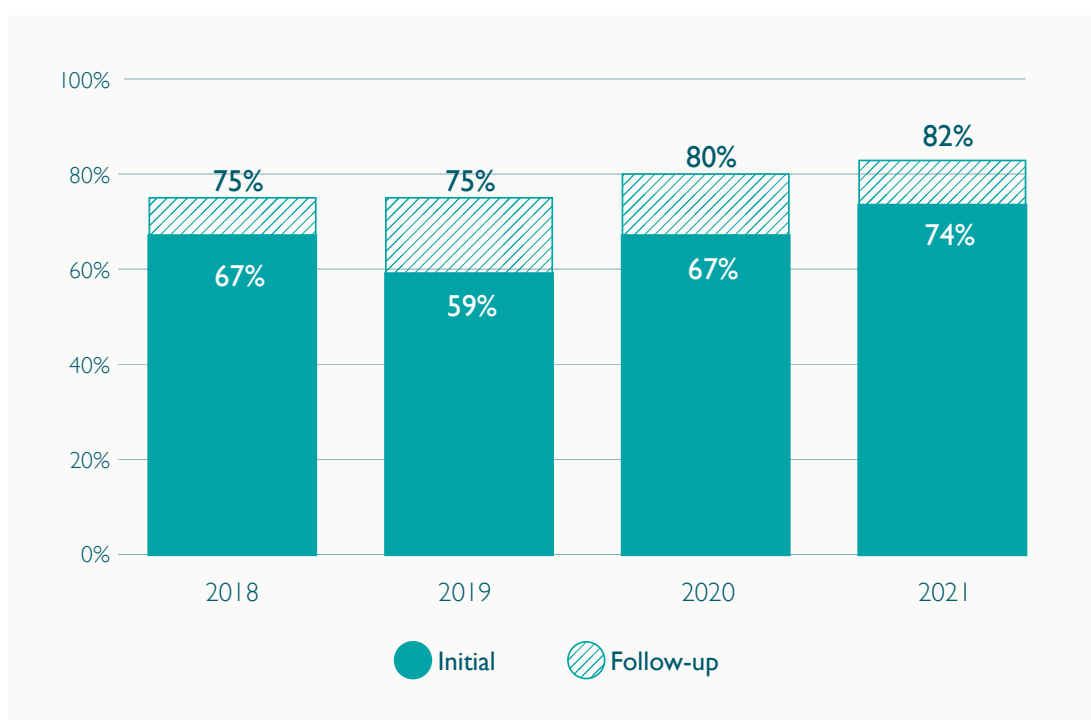


Figure 10 – Working hours: Compliance

Compliance scores at initial audit have increased since 2019, and have now reached 74% compliance. Follow-up audit scores have steadily increased to 82% compliance.

Where contractors were highly compliant, workers raised no concerns about their working hours. Last year, we reported that workers valued their increased work-life balance. Despite leisure facilities being closed due to COVID-19 safety measures, workers are still satisfied with their increasingly compliant working hours, even though their options during their leisure time were more limited.

This year, fewer cases of extreme working hours were found overall. This shows good progress – however, it is worth noting that due to multiple cancelled field trips in 2020 (please see 'Impactt's External Compliance Monitoring Programme'), our scope did not include an analysis of hours worked during Ramadan this year. We have consistently observed that a proportionally high number of non-compliances occur relative to Ramadan working hours regulations⁵⁶.

This year, Impactt audited a lower proportion of security contractors. This group has typically demonstrated numerous working hours issues. Issues related to contractors with auxiliary security functions persist⁵⁷, as highlighted in last year's report⁵⁸.

Compliance findings

Impactt raised two critical non-compliances at one contractor related to excessive hours and consecutive days worked without rest days. Workers at this contractor consistently worked:

- More than 10 hours per day, with highest number of daily working hours verified to be 15 hours in October 2020. This issue remained open at follow-up audit, as similar working hours were observed.
- More than 13 days without a rest day. Impactt found that:
 - 18 of 21 sampled workers worked between 17 to 38 consecutive days without rest in November 2020
 - 1 of 21 sampled workers worked 13 consecutive days without a rest day in October 2020
 - 8 out of 21 sampled workers worked between 18 to 38 consecutive days in September 2020.

This issue remained open at follow-up audit.

Impactt found one critical non-compliance related to lack of rest days:

- One contractor did not give security guards any rest days. Management reported being unaware that security guards were entitled to rest days. We were unable to discern an improvement at follow-up audit, as the security guards had been demobilised.

⁵⁶ See, for example our previous annual report (2020), page 36

⁵⁷ Please see the SC's Sixth Annual Workers' Welfare Progress Report section on Working Hours and Conditions – to be released in April 2021 – for details on the SC's activities on the matter.

⁵⁸ See, for example our previous annual report (2020), page 36

Impactt raised major non-compliances at six contractors related to either excessive hours worked, or lack of rest days:

- Workers at 4 contractors were working more than 5 hours without a break. 2 of these contractors were able to amend schedules to remediate this and therefore the issues were closed. At one contractor, this issue remains open – management reported that the mess hall provided by the MC was not sufficiently large for everyone to take their break at the same time. Workers at another contractor were found to be working 6 hours during their morning shift. At follow-up audit, this contractor had made changes in shift timings, but there remained some isolated cases of workers only being given a lunch break after 6 continuous hours of work. This issue was marked as 'progress made'.
- Workers at one contractor worked excessive daily working hours. Impactt verified that all sampled workers worked 11+ hours in the months assessed at initial audit. This issue remains open as document review at follow-up showed that at least 1 worker worked 12 hours per day for 4 consecutive days.
- 1 worker at another contractor worked for 27 days consecutively throughout August and September 2020. This issue remained open at follow-up, as 5 workers reported not having had a day off for up to 3 months of consecutive days worked.

Impactt raised the following issues at contractors related to inaccurate public holiday entitlements, annual leave wages and annual leave:

- One contractor did not pay annual leave wages to workers before they took annual leave. This issue remained open at follow-up.
- 3 contractors did not provide workers with their public holiday entitlements.
 - One contractor provided workers with 8 days of public holiday. This issue was closed at follow-up, as Impactt verified all workers had received backpay and that the contractor now provides workers with 10 days of public holiday.
 - The other 2 contractors provided workers with 7 public holidays⁵⁹. There was no follow-up audit for one of these contractors, as the SC had suspended operations with them. The issue raised at the other contractor was marked as 'progress made'. Management amended their policy and approved back pay of outstanding holidays to workers, but no workers had been on leave since the policy changed.

Impactt raised one critical observation related to time keeping records:

- One contractor was found to not have a robust timekeeping system at initial audit. Manual attendance records did not match with the monthly summary, despite workers being paid correctly for their time worked (verified with workers and by document review). This issue was closed at follow-up as manual attendance records now match the monthly summary of hours worked.

⁵⁹ There was no follow-up audit carried out at one of these contractors – and therefore issue has no assessment of potential progress made.

D. Working conditions

WW Standards requirements

The WW Standards entitles workers to:

- Free health insurance, medication, examination and treatment (WW Standards 9.9-11).
- Health screening prior to being mobilised to site (Bulletin 1, WW Standards 9.9c).
- Free professional counselling service (WW Standards 9.13).
- Sick leave based on obtaining a medical certificate (WW Standards 9.15).

There are also numerous health and safety requirements for the construction site, which main contractors are responsible for implementing (Appendix D of the WW Standards). They include requirements on:

- On-site medical provisions (e.g. first aid officers, first aid kits, nurses and doctors).
- Sanitary facilities.
- Dining and catering facilities.

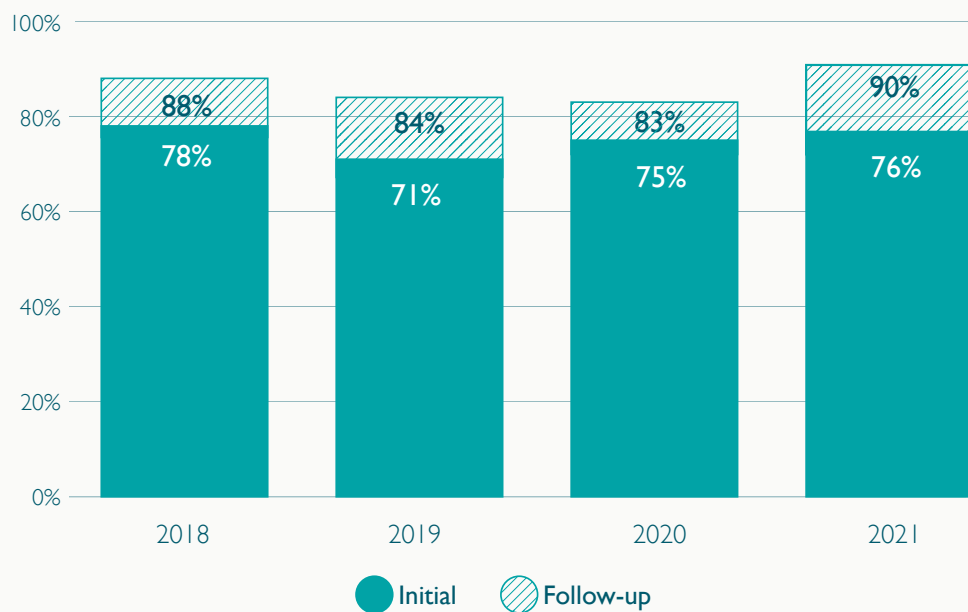


Figure 11 – Compliance scores: Working conditions



Impactt's audit scope covers general Health and Safety management practices at accommodation and construction sites, including Health and Safety inductions for workers⁶⁰.

Compliance scores have increased at follow-up audit from 83% to 90%, year on year.

All workers reported feeling safe at work and, that safety was prioritised on site. Workers commented that they felt safe because:

- They were provided with clear Health and Safety training in languages they understand.
- They were encouraged to raise Health and Safety concerns.
- Sufficient PPE was provided.
- Strong emergency response procedures were in place.

Muhammad feels safe on site and at his accommodation. The company provides safety inductions at both locations, and delivers regular Health and Safety talks. The safety officer continuously follows up on safety, including PPE and harnesses. There is a standby ambulance on site and free medical facilities. The company also provides a free medical facility at Hamad Hospital, and a standby car service at the accommodation to transport workers there.

As noted in last year's report, in 2019 the SC produced a list of recommended mental health service providers and encouraged contractors to provide these services to their workers. The SC also signed a 'Mental Health Pathway' agreement with Qatar's Ministry of Public Health and the Hamad Medical Corporation to conduct mental health screenings.

In October 2020, in response to increasing mental health stresses during the pandemic, the SC collaborated with stakeholders as well as the Ministry of Public Health (MoPH) and the Mental Health Service at Hamad Medical Corporation (HMC) to develop a COVID-19-specific mental health awareness campaign. The aim of this was to promote "information via different mediums, to educate staff and workers on the importance of maintaining mental health, tackling key issues including depression, anxiety, general wellbeing and the importance of staying active."⁶¹

Despite the improvements in compliance, and the rollout of the above campaign⁶², an important gap noted in last year's report remains. We spoke to a sample of workers across 6 contractors this year, all of whom were unaware of any mental health campaign or app providing support. Increasing the support available and raising awareness of it among workers therefore represents a key challenge for the SC and contractors to overcome..

The link between mental and physical health became more apparent than ever this year. Some 44% of workers reported that the COVID-19 pandemic affected their

⁶⁰ Impactt's scope of work does not include investigating accidents, including worker fatalities at construction sites. This is because our audits focused on worker welfare requirements rather than technical H&S construction standards – the latter of which are the focus of BWI's joint inspections.

⁶¹ <https://www.qatar2022.qa/en/news/qatar-prioritises-mental-health-as-qatar-gears-up-to-host-fifa-world-cup>

⁶² Please see the SC's Sixth Annual Workers' Welfare Progress Report Working Hours and Conditions – to be released in April 2021 – for further details

mental health, primarily due to concerns surrounding their families' wellbeing. 65% of these workers reported that their employer takes steps to support them with mental health issues. All these workers worked at contractors who provided mental health counselling by follow-up audit stage.

Compliance findings

Impactt raised one critical non-compliance, and one critical observation, related to workers having access to medical treatment:

- A minority of workers at one contractor reported not having access to medical treatment while being housed at an unapproved accommodation site due to lack of transportation. At the time of the initial audit, most workers had been moved to an SC approved accommodation. Workers further reported that they were unaware of any medical facilities at this camp. Impactt was able to close this issue at follow-up audit, as all workers have now been transferred to an SC approved accommodation site, and know how to access medical care.

Impactt raised major non-compliances at all 12 contractors related to a lack of professional medical counselling provided:

- Of these 12 contractors, 6 have managed to sign a contract with a reputable service provider for the provision of these services and therefore the findings were closed at follow-up audit. 4 contractors had established preliminary contacts with Mind Institute or other service providers, but had received no response by the time of the follow-up, and therefore this issue was marked as 'progress made'. One contractor did not make efforts to establish this policy, and the issue remained open.

Impactt raised issues at 4 contractors related to a lack of medical screenings:

- 3 contractors could not provide evidence of medical screenings for workers. 2 of these were closed at follow-up audit. The SC suspended operations with the third.
- Workers at one contractor did not go through the mandatory periodical medical screenings. This issue was closed, as Impactt verified up-to-date medical screenings for these workers that had taken place since the initial audit.

Impactt found two issues related to workers having to cover some of their own medical costs as well as transport to and from hospital:

- 4 workers interviewed at one contractor reported paying for both transportation and treatment at Hamad Hospital, but have not been reimbursed for this. No follow-up audit was conducted at this contractor, as the SC had suspended operations with them.
- 16 workers interviewed at one contractor reported having paid for their medical treatment and not having been reimbursed. This issue remained open.

E. Personal documents

WW Standards requirement

The WW Standards require contractors to:

- Provide workers with visas, Qatar residence permits and health insurance free of charge (WW Standards 9.2).
- Ensure that workers are in possession of their personal documents (identity papers and bank cards) and provide workers with individual, lockable facilities to store their documents (WW Standards 9.3).

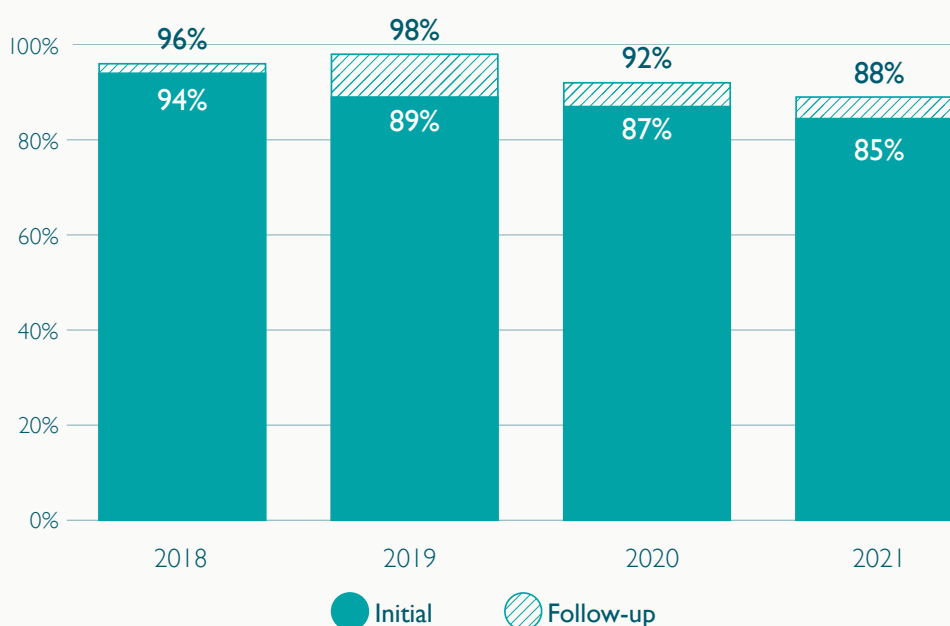


Figure 12 – Personal documents: Compliance

Compliance scores for personal documents at both initial and follow-up audits have remained consistently high. However, there has been a steady decrease in compliance observed in the past four years – dropping from 96% in 2018 to 88% in 2021 after follow-up.

Despite high compliance scores in this area, many high severity issues around passport retention and expired Qatari ID cards were identified. Expired Qatari ID cards were predominantly found for workers recruited locally whose sponsorship had not been renewed by their new employer. Workers with expired Qatari ID cards risk being arrested.

Across 2 contractors who retained passports and did not renew Qatari IDs, many workers reported low levels of satisfaction. These workers reported that they felt unable to resign. At one of these contractors, workers felt that the COVID-19 safety measures imposed prevented them from being able to take any leave, or to resign – and management did not address this issue. Similarly, 25 workers at another contractor expressed their dissatisfaction at being unable to move to a new employer before the new NOC requirements were in place (please see the 'Context' section for further

details on changes to NOC requirements). In addition to this, there was one instance of a contractor preventing a worker from leaving their employment and retaining his passport. Given the reduced number of contractors audited this year, it is concerning that these critical issues continue to occur.

Pakhi began his job [as a construction worker] eight months ago after his previous employer fired all its workers. He wants to go home because he misses his family and is worried about their wellbeing. However, he was unable to take leave as he would not have been able to afford the quarantine hotel. Similarly, he could not afford to pay the fine for his expired Qatari ID. Pakhi handed in resignation multiple times, but withdrew it when he realised that he cannot afford to pay the related costs.

Compliance findings

Impactt raised one critical non-compliance related to passport retention:

- At one contractor, 3 workers reported not being in possession of their passports. 2 workers stated that they had given them to their employer for safe keeping. 1 worker had been without his passport since the end of 2019. This worker stated that he had received an offer from another employer in Qatar. However, his current employer refused to sign a NOC, allowing him to transfer to the new employer. The worker stated that management informed him that he was free to go home but they would not allow him to move to another employer. This was confirmed by management at initial audit. This issue remained open, as 8 workers reported not being in possession of their passports at follow-up audit.

The following observations were also raised related to passport retention:

- At one main contractor, 9 of 25 workers reported being concerned over whether they would be asked to return their passports to the contractor if they were demobilised from SC projects.
- At another contractor, 10 of 21 workers reported that they only had their passports returned to them the day before the initial audit took place. This issue was closed at follow-up audit, as all workers confirmed being in possession of their passports since being mobilised on to SC projects. This highlights an important legacy challenge for the SC in ensuring that contractors can provide the same standards for their entire workforce, rather than only those deployed on SC projects.

Impactt raised two major non-compliances related to expired Qatari IDs and invalid Hamad Health Cards at 2 contractors:

- At one contractor, 6 workers had expired Hamad cards and 5 workers had renewed their health cards at their own expense. This issue remained open at follow-up.
- At one contractor, 2 workers did not have a valid Hamad card and 1 worker had an expired Qatari ID. This issue was marked as 'progress made', as 1 worker still holds an invalid Qatari ID.

The SC's Summary of Progress against the Roadmap

The tables below provide an overview of 2020 activities - as reported by the SC - arranged by roadmap pillar. This is the first year of the new roadmap.

Pillar 1 - Ensuring legacy	
<p>1. Prompt wider adoption of the WWS, SC practices and innovations across the State of Qatar. This includes the Hospitality Working Group and other areas under the ILO TCP.</p> <ul style="list-style-type: none"> The SC has ensured inclusion of the SC WWD in all 26 hotel contracts finalised. It has also engaged with 5 hotel operators and their OCPs in piloting the implementation of the SC's WWS, and is currently engaging further 6 hotel operators. At least four contractors have applied the SC's WWS in full on their non-SC projects, reaching 10,200+ workers. 10 contractors have upgraded their accommodation facilities in line with the SC's WWS for their 5,130+ workers. 12 contractors have rolled out WWF for its 12,500+ non-SC project workers, across 18 accommodation sites. The C&A Senior Manager acts as a key focal point – connecting and coordinating with various ministries (such as MoADLSA, the Ministry of Municipality and Environment (Baladiya) and Ministry of Public Health) on disseminating crucial information and streamlining the resolution of issues. 11 contractors have committed to SCURS payments beyond the SC's project scope. These commitments amount to QAR 25 million in total, benefitting 18,066 non-SC workers. The SC reported 291 contractors and OCPs to MoADLSA for their critical non-compliances. Based on this, MoADLSA acted as follows: (a) forced some contractors to shut down their accommodation and move to SC-compliant accommodation sites, (b) blacklisted the worst offenders (c) approved direct cash payment of salaries to workers at some sub-contractors, (d) shut down sites and conducted unannounced checks. 	<p>2. Continue to develop and disseminate a whitelist of approved subcontractors within the SC programme and Qatar.</p> <ul style="list-style-type: none"> A list of highly compliant contractors is shared with the SC Technical Deliver Office (Construction) team every quarter. A potential list of contractors for facility management, security services, housekeeping and other services related to hospitality is being finalised and expected to be shared by Q2, 2021.

Pillar 2 - Reinforcing Ethical Recruitment

1. Tighten requirements on Ethical Recruitment.

Contractors should provide evidence of end-to-end management of recruitment processes, including:

- a. Risk assessment of agencies in selection processes and due diligence over their sourcing of labour through any sub-agencies.
 - b. Evidence of the realistic costs of recruitment in agreements with their agencies with detailed breakdowns.
 - c. Capacity building programmes, with training for all staff (and agency partners) on new Ethical Recruitment policies.
 - d. Collaboration with QVCs and organisations in labour source countries.
- The SC is (a) providing orientation courses to guide contractors on preventive measures during their recruitment process and (b) promoting deployment of MoADLSA-registered recruitment agents for all recruitment processes.
 - The SC is working with contractors and OCPs to update their contracts with recruitment agencies to (a) cover the full cost of recruitment and mobilisation expenses and (b) seek performance bonds to ensure fair recruitment processes are implemented.
 - For the upcoming critical hospitality and host country projects, the SC is enforcing due diligence before finalising the recruitment agencies, sub-agencies and terms and conditions to be used in contracts.
 - The SC has worked with contractors to communicate that the employer (Contractor/ OCPs) must bear the full cost of recruitment and reimbursement.
 - The SC requires contractors to provide induction training on workers' rights and that recruitment should be free of cost.

2. Increase responsibilities of main contractors in conducting due diligence on any sub-contractors hired.

- a. Require main contractors to conduct regular, detailed checks of the above requirements at all subcontractors used.
 - b. Establish and communicate clear consequences for main contractors whose subcontractors continue to breach these requirements.
- All OCPs are expected to implement Ethical Recruitment practices. This includes a MoADLSA attested recruitment agency, and a contract detailing contractors' responsibility for the full cost of recruitment and mobilisation.
 - Main contractors conduct self-audits on recruitment processes and regular worker interviews to identify issues related to unethical Recruitment.
 - All critical violations related to Ethical Recruitment processes are reported to MoADLSA for further investigation and action.

Pillar 3 - Providing sustainable solutions to recurring problems

1. Increase awareness and understanding of contractors through targeted training programmes and ongoing monitoring of progress to ensure full ownership of high priority topics.

a. These topics include Ethical Recruitment, wages, working hours (particularly regarding security staff), worker benefits, and increasing worker dialogue. Additional topics should be added on an ad-hoc basis, based on findings.

b. Monitor progress at contractors receiving this training to assess effectiveness, and continuously develop and adapt training modules based on results.

- The SC's WWD conducts workshops to discuss resolutions, compliance and enforcement interventions. The SC's WWD also provides training to main contractors' WWOs.
- By the end of December 2020 the QISC had delivered training sessions to workers and frontline welfare teams on the following topics:
 - Occupational Health & Safety for 55 medical staff
 - Occupational Health & Safety for trade-specific work to 177 workers
 - Workers' Representative training to 166 workers
 - Advanced and basic life support for 67 medical staff
 - Workers' Welfare Induction training to 760 workers
 - Food Safety in Catering training to four HSE staff members
 - Behavioural Based Safety Leadership training to three HSE staff members.

2. Continue increasing enforcement of full SCURS payments across all contractors in collaboration with MoADLSA, particularly for demobilised workers.

a. Continue driving an increase in the total proportion of contractors participating in SCURS.

b. Continue to engage with MoADLSA to monitor and verify that all contractors are paying the full SCURS payments to workers, even once they are demobilised from SC work, or cease working for the employer.

- 209 contractors' commitment letters towards (SCURS) payments have been attested by MoADLSA for further enforcement and monitoring.
- The SC identified 396 workers vulnerable to a severe case of COVID-19 (above 55 years old and/or with chronic disease) on their project, releasing them from work obligations while ensuring they received full basic pay, and providing designated safe housing. Of these 396 high risk workers the SC provided MoADLSA with a list of the 132 who wished to return to work, so that these workers could be monitored and potentially moved to non-SC projects, on the following conditions: (a) the workers would be mobilised only for light duty work and (b) they would adhere to COVID-19 precautionary measures.
- The WWD has rolled out an on-boarding induction toolkit that can be used by Main Contractors for subcontractors.

Pillar 3 - Providing sustainable solutions to recurring problems (continued)

3. Incentivise and improve dialogue between contractors and their subcontractors, beyond auditing requirements.

- OCP stakeholder forums are arranged by Main contractors with OCPs to discuss worker welfare issues.
- 14 contractors have implemented life insurance coverage for approximately 8,100+ SC and 30,300+ non-SC workers. This can be paid directly to workers' families by the contractor management. The coverage ensures that workers' families would receive a substantial amount, ranging from QAR 50,000 to QAR 100,000, in the event of disability or fatality.

4. Monitor ongoing dialogue between workers and contractors to ensure workers understand new and existing policies, procedures and practices.

- Through WWFs, worker representatives are being provided with information on regulatory changes such as the abolition of the exit permit system, the new minimum wage and the abolition of NOC requirements.
- During the peak in 2020, 102 WWFs were in operation, covering 16,937 workers.
- The success of the WWFs has led to the rollout of forums to non-SC projects, with 12 contractors offering the forums to 12,590 non-SC workers to date. Mental health awareness training and screening conducted by Hamad International Training Centre reached 53 SC clinicians.
- Ministry of Public Health (MoPH) – Mental Health Centre and representatives from Hamad Medical Corporation – developed a mental health screening and referral process. Despite the programme being on hold between March and November, 1,548 workers underwent a screening in 2020.
- The SCWWD has worked with professionals from MoPH and the Mental Health Service at Hamad Medical Corporation to develop a mental health awareness campaign to provide support while COVID-19 restrictions are in place.
- The SC has established and communicated the availability of a central SC grievance hotline to workers and received a total of 863 complaints, 846 of which the SC reports to have resolved. The complaints received are predominantly in the field of Ethical Recruitment (654 complaints), accommodation (107 complaints) and Health and Safety (102 complaints).

Conclusion and Roadmap recommendations for 2020

The SC has shown resilience in the face of the COVID-19 pandemic, maintaining comparable compliance results, year on year. This is a significant achievement, given that elsewhere the pandemic has highlighted and deepened worker welfare issues.

Overall, issues per contractor decreased this year and worker satisfaction increased to an all-time high over the four-year reporting period. This is a tribute to the SC's prioritisation of worker welfare from the outset of the pandemic, and its rigorous Worker Welfare systems.

The SC has pioneered the reimbursement of recruitments fees through SCURS and this year further strengthened its implementation. The SC's commitment to promote SCURS has led to some contractors extending SCURS beyond SC programmes and to non-SC workers.

Key challenges remain for all actors working with migrant workforces, most particularly in reinforcing Ethical Recruitment to ensure that recruitment fees and related costs are prevented in labour source countries. Below, we detail further recommendations under the three-pillar roadmap (introduced in our 2020 report) to support the SC to lead by example.

We encourage the SC to focus in particular on Pillar 2 – Reinforcing Ethical Recruitment. The SC has the opportunity to demonstrate how the Tournament can make a significant difference both in Qatar and beyond.

Pillar I – Ensuring legacy

Recommendations:

1. Work with the public and private sectors to advocate for worker welfare beyond SC projects and on a wider scale. This includes formalising groups within the service sectors (hospitality in particular) and engaging with new stakeholder networks, as appropriate.
2. Continue the cooperation with MoADLSA to establish proven best practices of the WWS and its implementation across SC projects in Qatar.
3. Continue to update and disseminate the whitelist of approved subcontractors and include further details on good practices, especially within Ethical Recruitment.

Pillar 2 – Reinforcing Ethical Recruitment

Recommendations:

1. Continue to require contractors to use a transparent, open tender process for the selection of recruitment agencies and monitor its efficiency in establishing Ethical Recruitment practices.
2. Continue to refine the benchmarks on the true cost of recruitment from key labour source countries. Compare contractors' actual costs with benchmarks to ensure that the employer pays all costs of recruitment.
3. Provide tangible support for contractors to build the capacity of their own staff and the agencies with which they contract, so that they understand and can implement Ethical Recruitment policies.
4. Consult civil society organisations and NGOs to gain intelligence concerning issues relating to recruitment in labour source countries, especially relating to corruption and kickbacks, so as to improve Ethical Recruitment outcomes.
5. Support main contractors to champion the rollout of improved policies and procedures at their subcontractors, using their own experience.
6. Introduce incentives and/or penalties for main contractors to drive compliance with recruitment requirements.
7. Consult and collaborate with MoADLSA where national measures are required to address common challenges in Ethical Recruitment.

Pillar 3 - Providing sustainable solutions to recurring problems

Recommendations:

1. Continue to explore further targeted training programmes as an effective way to help ensure contractors' understanding and progression on high priority topics, given the strong results shown in pilots this year.
2. Continue to use influence to bridge knowledge gaps and to keep communication channels with contractors open and in use. In particular, continue to strengthen links between knowledgeable main contractors with good practices, and their subcontractors.
3. Promote the continued use of WWFs and further reiterate the importance of effective communication channels and social dialogue between workers and contractors, beyond grievance mechanisms. This should prompt a shared understanding of the importance of policies, procedures and practices and will also highlight high risk areas.
4. Extend and continue to promote the use of existing grievance mechanisms (including the SC hotline, WWFs and WWOs) to new contractors in the hospitality sector, as the construction phase draws to a close.
5. Engage with relevant government bodies to explore national measures to implement sustainable solutions for recurring problems at scale.

Appendix 1 – Topic area descriptions

Topic area	Requirements
Due diligence	<ul style="list-style-type: none"> • Contractor conducts self-audits on a quarterly basis. • Contractor conducts ad hoc audits of their sub-contractors. • Contractor ensures that their subcontractors undertake quarterly self-audits. • Contractor submits required information to the SC on a monthly basis. • Contractor cooperates with the External Monitor's audits.
Treatment	<ul style="list-style-type: none"> • Contractor treats workers equally and fairly in their selection, employment, training and promotion opportunities. • Contractor has written policies on equal opportunities in order to: prohibit the imposition of additional or financial penalties as a disciplinary measure; prevent violence, bullying and harassment; prohibit the exploitation of workers' vulnerabilities; and take disciplinary actions against employees who breach the prescriptions of the WWS. • Workers are free to move in and out of the accommodation site and to travel to their home country during leave without penalty or threat of termination.
Recruitment fees	<ul style="list-style-type: none"> • Contractor reimburses workers who provide proof of paying recruitment fees. • Contractors pay for all costs of relocating workers to Qatar.
Contracts and administration	<ul style="list-style-type: none"> • Contractor uses recruitment agents registered with MoADLSA. • Contractor has a written agreement with the recruitment agency which meets WWS requirements. • Workers receive a written offer of employment upon recruitment. The offer of employment is explained to them in a language which they understand, and the workers sign the offer of employment without coercion. • Workers receive a MoADLSA-attested employment contract which complies with legal requirements and is explained to workers in a language they understand. • The terms of the employment contract are the same or more advantageous than those of the offer of employment. • Contractor maintains employee files as required by the WWS.
Induction	<ul style="list-style-type: none"> • Contractor completed a New Starter Checklist for each new worker. • Contractor provides an accommodation induction to workers in a language they can understand, which covers the requirements in the WWS. • Contractor delivers Health and Safety training. • Contractor provides workers with training and refresher sessions to perform their jobs.

Topic area	Requirements
Personal documents	<ul style="list-style-type: none"> • Contractor ensures that workers have a valid residence permit, Qatari ID and health card. • Workers are in possession of their personal documents. • Contractor provides workers with a storage facility.
Construction site (H&S)	<ul style="list-style-type: none"> • Contractor provides workers with health insurance or a Hamad card. • Contractor pays for medicine, examinations and treatment.
Wages and allowances	<ul style="list-style-type: none"> • Contractor pays travel expenses for workers' annual leave. • Contractor pays workers in accordance with the Wage Protection System. • Deductions from wages are made in accordance with legal requirements. • Contractor provides workers with a payslip, as required by the WWS. • Overtime is paid according to legal requirements. • Contractor provides a rest day in lieu when workers work on a rest day.
Working hours, rest and leave	<ul style="list-style-type: none"> • Contractor complies with legal working hours limits: weekly working hours, summer working hours, Ramadan working hours. • Contractor provides legally mandated rest breaks and rest days. • Contractor provides legally mandated annual leave, sick leave, bereavement leave and maternity leave. • Contractor provides legally mandated public holidays.
Disciplinary procedures	<ul style="list-style-type: none"> • Contractor has received approval of its disciplinary policy from MoADLSA and explained the policy to workers. • Deductions for disciplinary purposes comply with legal requirements.
Accommodation and food	<ul style="list-style-type: none"> • The SC has a detailed set of requirements to cover accommodation and food, including infrastructure, bedrooms, showers, communal areas, dining, communication and laundry.
Transportation	<ul style="list-style-type: none"> • Requirements related to the transportation of workers from their accommodation to the construction site including bus safety and signage, licenses and local inspections, driver qualification and bus boarding infrastructure.
Grievance mechanisms	<ul style="list-style-type: none"> • Contractor advised workers on avenues to report grievances.
Worker representation	<ul style="list-style-type: none"> • Contractor appoints a Workers' Welfare Officer. • Contractor establishes a Workers' Welfare Forum, which meets monthly and has written minutes. • There is one Worker Representative by nationality, elected by workers.
End of service procedures	<ul style="list-style-type: none"> • The contractor pays for repatriation expenses. • The contractor pays workers an end-of-service gratuity before they return to their home country.

Table 3 - Impactt's audit structure (topic areas)

Appendix 2 – Impactt's audit approach

Impactt's compliance monitoring methodology for the SC

Impactt developed an independent methodology tailored specifically to assess contractors and subcontractors' compliance against WWS and relevant Qatar law. The methodology covers:

- Sampling and auditing of contractors including in-depth worker interviews.
- Assessment of the effectiveness of SC audits.

The audit methodology follows international best practice and Impactt's approach of placing worker experience at the centre of the agenda. This approach allows Impactt to test the degree to which the efforts made by contractors and/or the SC result in recognisable improvements for workers on a day-to-day basis.

In order to achieve this:

- Impactt's audit process, interviews, document review and reporting follow the worker journey from their recruitment in their home country and arrival in Qatar to their everyday working practices to repatriation. At each stage, Impactt aims to identify what management teams want to achieve for the business and workers, how this translates into business practices and/or systems, and the degree to which this is recognised by workers.
- Impactt's audit teams comprise a qualified social auditor and a dedicated worker interviewer. Impactt's worker interviewers speak workers' languages and use a mixture of appreciative enquiry and participatory techniques to create an environment of trust. This enables workers to reflect on and share their experiences. Impactt's approach allows workers to tell their personal stories rather than answer a list of compliance questions. This elicits a more detailed response that can provide vital context for audit findings. It also provides insight for contractors on what they need to do to build better bridges with workers and better meet their needs.

Impactt's bespoke methodology enables the SC and contractors to:

- Identify (and then address) workers' welfare risks before they materialise.
- Identify contractors who understand the requirements and demonstrate improvement, and allocate support to those who do not.
- Focus the efforts of the Workers' Welfare Programme on the issues that matter most to workers, in order to make the greatest positive impact on their lives.
- Demonstrate improvements based not only on compliance indicators but also on workers' perspectives and the impact of the project on workers' lives.

Audit structure

The structure of Impactt's audits includes:

- Pre-audit written communication and telephone call with each contractor to ensure they understand the audit objectives and process.
- Opening meeting at the contractor's offices with their senior and operational management, including their human resources, compliance and Workers' Welfare Officer to explain the objectives and procedures of the audit.
- In-depth interviews with management and review of documents to understand the contractor's policies and procedures and assess compliance with the WWS and Qatar Labour Law.
- Accommodation visit to assess physical conditions and welfare provisions, and interview workers. Each contractor is contractually responsible for providing accommodation to their workers in line with the WWS. In some cases, subcontractors use the same accommodation as their main contractor.
- Site visit to assess workers' welfare facilities and basic safety standards (using the WWS checklist) and to interview workers, where safety procedures allowed. In some instances, Impactt's auditors reviewed relevant documentation kept at site offices. Impactt mostly conducted site visits among main contractors, who are responsible for workers' welfare at the construction sites.
- Pre-closing meeting with contractor management to discuss preliminary findings.
- Closing meeting with contractor's senior and middle management, in which Impactt's auditor presents the findings, including the classification and severity (see below). At this meeting, Impactt's auditor and the contractor discuss and agree the findings. A representative from the SC and the PWVO typically attend the closing meeting.
- At the end of the audit, Impactt provides the contractor and the SC with a written copy of the audit findings. Contractors use this document to create remediation plans for each non-compliance or observation raised.

The audits covered:

- Due diligence processes: contractor's self-audits and audits of their supply chain.
- Integration of the WWS into business processes: strength of management systems.
- Compliance with the WWS: based on the requirements in Edition 2 of the WWS.

The audits also cover general Health and Safety management practices at accommodation and construction sites, including Health and Safety inductions for workers. Impactt did not investigate or assess accidents, including worker fatalities at construction sites. This is because Impactt's audits focused on workers' welfare requirements rather than technical Health and Safety construction standards.

Using the "worker journey" structure, Impactt's auditors begin the audit with a review of the contractor's due diligence processes, followed by their processes to recruit and induct workers, working and living conditions, dialogue mechanisms and finally their end-of-service and repatriation procedures. Evaluating every aspect of the journey is critical, as the issues identified are typically interrelated and inherent to the global labour supply chain.

Changes to Impactt's compliance monitoring methodology for the SC – Rapid assessments

As a part of the SC's strategic decision to leave a meaningful legacy, Impactt piloted a new training-focused model with two contractors. The model aimed to increase contractor understanding, helping them to achieve workshop improvements, and drive lasting change in the issue areas with previously stagnating results. These key focus areas are worker dialogue, recruitment fees, working hours and wages and allowances.

The model replaced Impactt's three-day WWS compliance audit with a two-day **rapid assessment** and **group training**.

- **The rapid assessment** covered all compliance sections in full, except for accommodation and transportation. This decision was made as compliance in these sections continuously increased due to the SC's own efforts (e.g. the SC workforce is increasingly housed in highly compliant accommodation).
- **Targeted training:** Following the rapid assessment, the two pilot contractors (HR lead and/or senior manager) attended 3 group training sessions (2 hours each), targeted at their key improvement areas.

Training	
Topic 1 – Recruitment fees (Prevention and Remediation)	<ul style="list-style-type: none">• Prevention - process of Ethical Recruitment, transparent supply chains, due diligence• Remediation - process of induction including new starter checklist, dialogue and investigations on recruitment fees.
Topic 2 – Pay and hours (increasing understanding, awareness and dialogue)	<ul style="list-style-type: none">• Understanding the need of workers• Ways to enhance communication and dialogue• Way to incentivise workers, increasing productivity and reducing extra work.
Topic 3 – Understanding and delivering workers' benefits	<ul style="list-style-type: none">• End of service benefits, repatriation flights, medical benefits• Resignation procedures• Productivity - Benefits for workers, benefits for business.

Following the training, Impactt conducted two calls with the contractors, between initial and follow-up audit, to monitor progress and provide consulting services to advise on remediation actions.

As noted in the 'findings' section, the two contractors who took part in the pilot outperformed their peers in both closing issues and increasing compliance.

Changes to Impactt's compliance monitoring methodology for the SC – Hybrid approach

Given COVID-19 travel risks, Impactt adapted its monitoring methodology to a hybrid model for the second and third out of the three visits this year. The hybrid approach consists of:

- a small team (3- 4 people instead of 8-10 people) present on the ground and
- a team of 8-10 people conducting most assessment activities remotely, while the small team is on the ground.

Remote activities	On-site activities
<p>Impactt</p> <ul style="list-style-type: none"> • held opening and closing meetings • interviewed management • reviewed documentary evidence in soft copy form. <p>Lead auditors held debriefs, triangulated information and reported on findings remotely.</p> <p>Most worker interviews took place through group video calls.</p>	<p>The on-the-ground team responsibilities included:</p> <ul style="list-style-type: none"> • Ensuring worker interviews were conducted without putting workers at risk of contracting the COVID-19 virus (using well ventilated locations, allowing for social distancing, wearing face coverings etc) • Ensuring worker interviews are conducted confidentially, away from management and without interference or coaching • Inspecting accommodations, buses, and sites • Review documents where digital versions could not be provided or were inconclusive, particularly if there were transparency concerns. • Conducting worker and management interviews in person, where it is not possible to do so remotely. • Support contractors with setting up conference calls.

The hybrid methodology goes hand in hand with a need to account for the possible impacts of COVID-19 on worker welfare and on contractor's ability to adhere to the standard. Impacttt developed and followed a rating scheme for COVID-19-related findings that builds on two key questions:

1. Is the worker welfare issue caused by COVID-19 or is it endemic to a contractor's practices?
2. Has the contractor taken reasonable steps to prevent harm to workers?

Where a non-compliance would have usually been raised via our pre-pandemic auditing methodology, Impacttt checked whether the actions taken (or not taken) by the contractor were (a) related specifically to COVID-19, or (b) whether this was an endemic issue regardless of the pandemic. If the issue was both related specifically to COVID-19, and if the contractor also took reasonable and appropriate steps to prevent harm to workers, Impacttt raised such findings as observations. Where workers were severely impacted by the issue, despite contractors' having taken action, Impacttt raised the findings as critical observations.



Appendix 3 – Methodology

Scope of Impactt's work

Prior to beginning its compliance monitoring work in 2016, Impactt developed a bespoke auditing methodology to assess contractors' compliance with the WWS and relevant Qatar Labour Law⁶³. Impactt's audits are structured following the worker journey (see Appendix 1 for a description of topic areas). Impactt selected which contractors to audit independently and randomly from a cross-section of projects and contracting tiers⁶⁴. Impactt selected a sample of workers for interview, ensuring a cross-section of nationalities, job types and lengths of service⁶⁵, and conducted group and individual interviews, along with satisfaction and socio-economic surveys. These took place at the workers' accommodation or on site away from management, enabling workers to speak freely and confidentially. See below for details on sampling and methodology.

Limitation: cooperation during audits

In 11 out of 12 contractors audited this year, contractors were cooperative with Impactt, providing all documents requested (both soft and hard copy) and not interfering with the audit. However, there was 1 transparency issue raised. This was document-related. This type of attempt to undermine the system is a widely documented, unintended consequence of auditing regimes. In all cases, Impactt was able to uncover the real situation and report accordingly to the SC.

Sampling of contractors

Impactt selected which contractors to audit independently and randomly from a cross-section of projects and contracting tiers. Table 5 below shows that Impactt has covered all project sites and, where applicable, all tiers. Since 2018, Impactt has been shifting its focus towards lower tier suppliers. This year, Impactt included an increased number of service providers as the construction phase under the SC's scope is coming to an end, and services will be at the core of the SC's operations in the run-up to the tournament.

Site inspections were conducted during Main Contractor audits only. To allow for a follow-up audit in the quarter after the initial audit, only contractors with four or more-month SC project assignments to wwere included in the sample.

⁶³ Impactt's bespoke methodology followed the WWS. Impactt audited contractors against Qatari labour law in the following areas: working hours, rest and leave and disciplinary procedures.

⁶⁴ Site inspections were carried out during auditing main contractors only. To allow for a follow up audit the quarter after the initial audit only contractors with 4 or more month assignments to SC projects are in the sample.

⁶⁵ To gain a relevant and timely insight into current recruitment procedures workers who were recruited within the year are overrepresented.

Sites	2021			2020			2019			2018			Overall		
	MC	T1	T2	MC	T1	T2	MC	T1	T2	MC	T1	T2	MC	T1	T2
Al Bayt Stadium				1		1	1	1	1	1	1	1	3	2	3
Al Bidda (SC office)	2			1			1			1	1		5	1	0
Al Janoub Stadium				1	3	1	1	2	1	2	2		4	7	2
Ahmad Bin Ali Stadium			2	1	2		1	2		1	1		3	5	2
Al Thumama Stadium			1		3	1		4	1	1			1	7	3
Doha Port		1	1	2			2			1			5	1	1
Education City Stadium					2	1		2	1	1	2	1	1	6	3
Khalifa Stadium										1	2		1	2	0
Lusail Stadium		3			3	2		3	2	1	1		1	10	4
Training sites				1			1						2	0	0
SC Nursery										1			1	0	0
Ras Abu Aboud Stadium	1		1		1			1				2	1	2	3
Production Workshops ⁶⁶					1			1					0	2	0
Total	3	4	5	7	15	6	7	16	6	11	10	4	28	45	21

Table 5 – Coverage of SC project sites⁶⁷.

Main Contractors: these contractors have a direct relationship with the SC and a contractual obligation to ensure their subcontractors comply with the WWS.

Tier 1: specialist companies such as excavation, scaffolding, landscaping, contracted by the main contractors.

Tier 2: generally manpower agencies, supplying labour to other companies.

⁶⁶ Impactt audited the off-site production facilities of one supplier to the SC sites that rolled out the WW Standard to all his operations.

⁶⁷ Some contractors operate across multiple sites - and Impactt's document reviews and management interviews during audits cover operations at all of these sites. Therefore, the total number of sites covered in the table (28) is greater than the total number of audited contractors (22).

The table below (Table 6) summarises Impactt's sample in relation to the overall population of workers at SC projects.

Impactt sample 2021				
		Sample	SC scope ⁶⁸	% covered
Interviews conducted ⁶⁹		394	17,639	2%
# of workers' nationalities		9	69	1%
Worker interviews	Main	172	8,896	2%
	Tiers 1-3	222	8,745	3%
SC sites audited		6	13	46%
Contractors audited (initial and follow-up)	Main	3	64	5%
	Tiers 1-3	9	224	4%

Table 4 - Impactt sample

The nationalities of workers interviewed are shown in the figure below (Figure 13). Impactt interviewed workers of nine nationalities present at SC projects. 84% of all workers interviewed were nationals of India, Bangladesh and Nepal, the most common countries of origin for workers at SC projects.

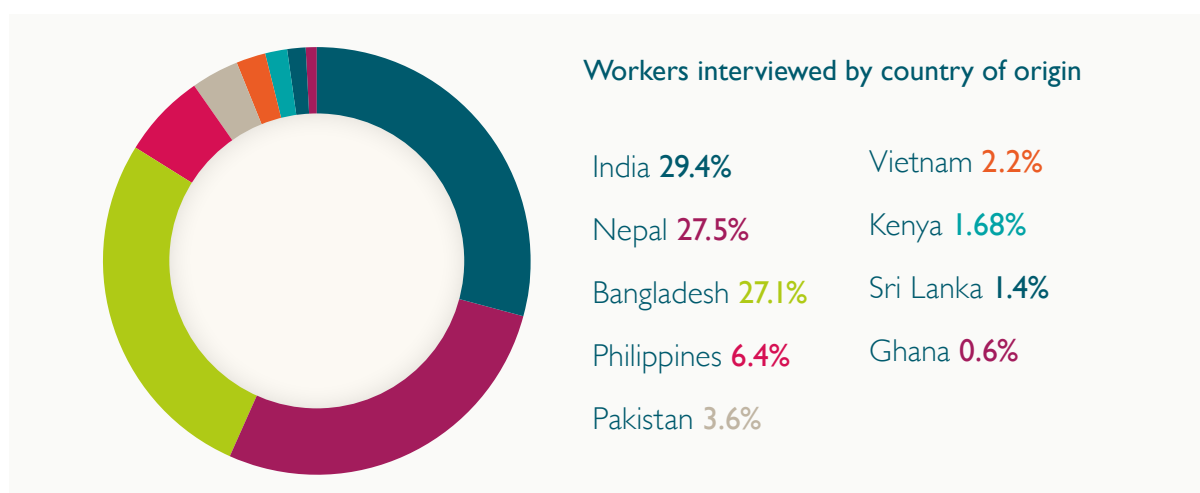


Figure 13 – Workers interviewed by country of origin

⁶⁸ Data provided by the SC, as of December 2020

⁶⁹ Impactt interviewed 394 workers when carrying out initial audit and 136 during follow up audits. To follow up on compliances raised Impactt selected some workers who were interviewed in initial audits again for follow up interviews. Worker satisfaction presented in this report draws on data from initial audits only, unless progress between initial and follow up audit is specifically analyzed. This is to avoid any doubt over these cases of double counting.

Worker Interview Methodology

An Impactt worker interviewer spends up to three person days (in initial audits) interviewing a contractor's workforce. In each audit we carry out group and individual worker interviews. This year, most worker interviews were facilitated via video calls, with one Impactt team member supporting the set-up to ensure confidentiality and appropriate COVID-19 safety measures.

Impactt spent additional time interviewing workers to counterbalance connectivity issues and held individual worker interviews based on workers' preferences, i.e. at a time and on an app of their choosing. Impactt has conducted a total of 9,000 remote worker interviews globally, since COVID-19 restrictions began. We have learnt that individual remote interviews offer, like other formats of off-site interviews, advantages in discussing sensitive subjects. Impactt's remote interviews include several control questions on workplace-specific items, a rapid camera-view around the room, if appropriate - and further verbal checks, ensuring the workers can speak confidentially.

Interviews are conducted in privacy, without contractors' interference and in workers' mother tongues wherever possible. Impactt's team includes experienced worker interviewers speaking Hindi, Bengali, and English).

We choose a sample of workers that is representative of overall workforce demographics at each contractor. To assess conditions where there is an increased risk of exploitation, we take worker's different levels of vulnerability into account when sampling and, for instance, ensure that we talk to workers in lowest skill job roles. Samples cover all shifts, key nationalities, genders, job roles and a variation of lengths of service allowing for a 360-degree view of the working conditions at a contractor. To gain relevant and timely insight into current recruitment procedures, workers who were recruited within the year are always represented in each sample.

Impactt's worker interview methodology combines narrative, semi- structured and structured interviews. A focus on qualitative methods allows greater insight into the experience of workers than traditional worker interviews approaches. Each interview, whether focus group or individual roughly follows three phases feeding into different outputs:

Method	Output
<p>Narrative interview</p> <p>After having built rapport and trust with workers Impactt asks open ended, thematically wide questions at the beginning of each group interview. This is to encourage workers to share their experiences and realities and to understand what matters most to them without leading, influencing or narrowing the answers.</p> <p>Individual interviews are mainly narrative.</p>	<ul style="list-style-type: none">• Workers' sentiments and priorities• Pen portraits (workers' stories) – which can be found throughout this report.

Method	Output
<p>Semi-structured interview</p> <p>The core of each worker interview progresses along the “worker journey” (from recruitment right through to end of service). Impactt invites workers to share their workplace experiences in relation to key thematic areas covered by the WWS.</p>	<ul style="list-style-type: none"> • In depth understanding of non-compliances, observations and how they affect workers. Findings are used confidentially by auditors in management interviews • Workers' likes and dislikes.
<p>Structured interview or survey</p> <p>Depending on workers' literacy levels, we either ask targeted and closed questions, or conduct a written survey at the end of each interview. This allows us to measure workplace satisfaction and learn specific details, including any costs of recruitment.</p>	<ul style="list-style-type: none"> • Quantitative data, including satisfaction metrics and recruitment fee reporting.

Table 7 – Interview methods and outputs



MAKING WHAT'S
GOOD FOR WORKERS
WORK FOR BUSINESS