



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

Shifting focus to delivery and legacy



MAKING WHAT'S GOOD FOR WORKERS
WORK FOR BUSINESS

April 2022

Table of contents

Glossary of terms	3
Executive summary	6
Recommendations.	12
Pillar 1 – Ensuring legacy	12
Pillar 2 – Reinforcing ethical recruitment	12
Pillar 3 – Providing sustainable solutions to recurring problems	13
About the authors.	14
Introduction	15
The 2017 annual report.	16
The 2018 annual report.	16
The 2019 annual report.	17
The 2020 annual report.	17
The 2021 annual report.	18
Context	20
Implementation of National Law	21
Supreme Committee for Delivery & Legacy Workers' Welfare programme	24
Key programme milestones	24
Impactt's External Compliance Monitoring Programme	25
Findings	27
Compliance findings.	27
Severity and prevalence by topic area	37
A. Ethical recruitment	38
B. Wages and allowances.	48
C. Working hours, rest and leave	54
D. Treatment.	59
E. End of service procedures	63
The SC's Summary of Progress against the Roadmap	67
Conclusion and Roadmap recommendations for 2022.	70
Pillar 1 – Ensuring legacy	71
Pillar 2 – Reinforcing ethical recruitment	71
Pillar 3 - Providing sustainable solutions to recurring problems.	72
Appendix 1 – Topic area descriptions.	73
Appendix 2 – Impactt's audit approach.	76
Appendix 3 – Methodology.	78

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.

Call-off contracts

Temporary contracts are in place with the SC wherein contractors provide services only during specific months. This includes different types of contractors such as Tournament Bus Services (TBS) providers as well as Hotel Operators.

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

Hotel Operators

Contractors that operate hotel services in Doha. This includes global hotel brands as well as local Qatari hotels.

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.

Mol

Ministry of Interior

MoL

Ministry of Labour

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)

A 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 2022

The reporting period for this report: June 2021 to January 2022

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 MoL that requires employers to pay employees' wages through bank accounts and to submit details of these payments to MoL. The system is designed for MoL 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 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 sixth 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 June 2021 and January 2022) and measures the SC's progress against the Roadmap defined in our 2021 report.

The SC first appointed Impactt as an 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 Labour (MoL)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.

The Workers' Welfare Standards (WWS) were developed in consultation with NGOs and stakeholders as universally applicable. The detail of the standards has primarily been developed with the construction sector in mind. However, over the years the WWS has been applied to the service sector (i.e., catering, facility management, housekeeping, pantry services). From early 2019, the SC workers' welfare remit was extended to include the hospitality sector and tournament delivery services. In July 2021, a new workers' welfare and labour rights function has been established in the Qatar 2022 Local Organising Committee (LOC)³ led by select members of the workers' welfare team. The remit has expanded to include 150 hotel operators and several contractors from host country operations.

The tournament has put the hospitality sector under scrutiny at a level that has never been witnessed before. Unlike the stadium construction and auxiliary services sector, which were directly delivered by the SC, the hotels were constructed by other entities, not specifically for the Tournament, and in most cases are managed by private sector companies. Therefore, the SC is collaborating extensively with the MoL to ensure improved compliance and adequate enforcement.

Over the past couple of years, landmark changes have taken place in Qatar, such as the dismantling of the Kafala system through the dismantling of exit permits (January 2020) and No Objection Certificates (NOC) (September 2020) and the adoption of a non-discriminatory national minimum wage (March 2021). 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.

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

² MoL audits follow Qatari labour law rather than the WWS.

³ The LOC is a Joint Venture between FIFA and the SC, <https://www.qatar2022.qa/en/about>, last accessed on March 1st 2022.

A shift in focus towards the hospitality sector

As the stadium construction phase is largely complete, the SC's focus has moved to host country related services and operations, with a focus on the hospitality sector. This is reflected in our external monitoring sampling this year, which featured eight hospitality contractors alongside eight construction and auxiliary services contractors.

The SC has worked to develop the applicability of its universal WWS and systems to the specific challenges of the hospitality sector in terms of accommodation facilities, time attendance management, discrimination and recruitment practices. Please refer to Appendix I for details of the monitoring methodology, including which parts have been adapted to the hospitality industry.

In this report, we have compared the performance of Construction and auxiliary services contractors with previous years and presented this first year of Hospitality sector results separately.

Hospitality contractors in our sample demonstrated the following key differences from the construction and auxiliary services contractors:

- Hospitality contractors had a higher proportion of female workers (34% female) than the construction and auxiliary construction services sectors (5% female). Gender diversity brings many notable positives to a workforce, but it can also bring with it heightened risks of sexual harassment, and gender-based discrimination
- Hospitality contractors tend to prioritise candidates with English language skills, resulting in a different source country profile. The active workforce from which we drew our sample this year was far more diverse in terms of nationality than in previous years. This brings a heightened risk of discrimination through different pay, hours, or job roles based on nationality, see the section on 'treatment'
- This difference in countries of origin has also driven a change in findings regarding recruitment fees, with lower average amounts reported by workers this year, as noted in the 'Ethical Recruitment' section. Contractors in hospitality tend to utilise direct hiring more often than the construction and auxiliary services sector as well, which can help to reduce middlemen and consequently reduce opportunities for exploitative fee-charging. However, workers are still commonly paying fees and it is important to note that the SC's Universal 'Recruitment' Repayment Scheme (SCURS) has not yet been adapted for the hospitality sector

Ongoing challenges related to COVID-19

The COVID-19 pandemic has continued to affect personal and business life globally. Migrant workers across the world have been particularly vulnerable to health, financial and human rights impacts. In Qatar, at certain times during the year, COVID-19-related safety measures were implemented across Qatar. As we found last year, at times these continued to affect freedom of movement outside worker accommodation, the ability to conduct regular elections of worker representatives, and updates to Qatar Identity cards (QIDs). Workers however were finally able to travel home for annual leave, although many reported that the costs of quarantine were too high, and therefore chosen not to

do so⁴. Workers reported being impacted by the continued closure of computer rooms and other recreational facilities at accommodation sites due to COVID-19.

Continuing from last year's approach, we categorised findings 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				SC's Scope workers and main nationalities			
310 Total contractors on SC projects				13,574 Total workers of 69 nationalities on SC projects			
Main contractors: 147	Impactt sample: 16 Contractors audited (5%)			Indian: 40%	Impactt sample: Worker interviews 573 (4%)		
Tier 1: 146	Main contractors	Tier 1	Tier 2	Bangladeshi: 19%	Indian	Bangladeshi	Nepali
Tier 2: 17				Nepali: 16%			Other
Tier 3: 0	8 (2.5%)	8 (2.5%)	0 (0%)	Other: 25%	30%	9%	26%
							36%

This year we audited four construction contractors, three construction auxiliary services providers (maintenance and fire safety) and one manpower contractor. The Hospitality contractors are comprised of three multinational hotel operators, three hospitality service providers (cleaning, catering) as well as two Tournament Bus Services (TBS) providers.

The above figure reflects total number of contractors audited overall, as well as total number of workers interviewed with a breakdown per nationality. The figure below shows the same breakdown, for the construction and auxiliary services sector.

SC's Scope - construction and auxiliary services contractors and tiers				SC's Scope - construction and auxiliary services workers and main nationalities			
231 Total contractors on SC projects				7,255 Total workers of 58 nationalities on SC projects			
Main contractors: 109	Impactt sample: 8 Contractors audited (3%)			Indian: 33%	Impactt sample: Worker interviews 196 (3%)		
Tier 1: 105	Main contractors	Tier 1	Tier 2	Bangladeshi: 28%	Indian	Bangladeshi	Nepali
Tier 2: 17				Nepali: 20%			Other
Tier 3: 0	2 (<1%)	6 (3%)	0 (0%)	Other: 20%	37%	10%	30%
							23%

⁴ Currently, contractors only required to pay quarantine packages for new hires.

The figure below represents the breakdown of contractors audited per tier and workers interviewed in the hospitality sector.

SC's Scope - Hospitality contractors and tiers 79 Total contractors on SC projects				SC's Scope - Hospitality workers and main nationalities 6,319 Total workers of 72 nationalities on SC projects				
Main contractors: 38	Impactt sample: 8 Contractors audited (10%)			Indian: 46%	Impactt sample: Worker interviews 377 (6%)			
Tier 1: 41	Main contractors	Tier 1	Tier 2	Bangladeshi: 5%	Indian	Bangladeshi	Nepali	Other
Tier 2: 0				Nepali: 12%				
Tier 3: 0				Other: 36%				
	6 (8%)	2 (3%)	0 (0%)		27%	8%	24%	42%

Findings

Compliance results remain broadly comparable to previous years across the 16 contractors audited. The construction and auxiliary sector scored the same as last year – with an average compliance of 72% at initial audit – while hospitality contractors scored an average of 79%. Hospitality contractors show a higher overall compliance score at follow-up audit (84%) than construction and auxiliary services contractors (78%).

Overall (hospitality and construction and auxiliary services) contractors closed out or made progress on 49% of issues, down from 70% in 2021. However, disaggregated figures for the two sectors show that construction and auxiliary services contractors were able to close or make progress on 78% of issues raised while hospitality contractors have closed or made progress on 84%.

Worker satisfaction saw a decrease this year for the first time since we began our worker surveys for the 2018 report. This year, workers reported a 16% decrease in satisfaction from 4.3/5 to 3.7/5. This is a notable decrease and partly relates to reduced satisfaction with income in the new sectors in our sample, despite higher earnings on average.

This year, fewer contractors in our sample were participating in the innovative SC Universal Reimbursement Scheme (SCURS) with two out of eight of the construction contractors adhering to the scheme. At present, the SC is working with hospitality contractors with a view to promoting repayment.

To date, the SC calculates a total reimbursement by contractors of up to QAR 103.95 million (equivalent to USD 28.4 million) paid to 31,220 SC workers 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 2021, QAR 83.20 million (USD 21.96 million) of the total to be reimbursed had already been paid. MoL has attested 219 contractors' SCURS commitment letters, which enables MoL to take action against any contractor that fails to meet their commitment. 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.

The following section outlines key findings on priority topics:

Ethical recruitment⁵

The challenge: Compliance remains low compared to other areas. The overall percentage of workers reporting fees has risen from 68% last year up to 82% this year. Efforts need to focus on engaging with labour source countries and establishing stronger requirements for due diligence which go above and beyond the current VWS.

Progress: Impactt saw an improvement in compliance this year overall, with average scores at follow up of 70% compared to 48% last year. The amount of fees and related costs being reported by workers has reduced on average, from USD 1,333 last year to USD 678 this year.

We did identify some good practices. Two contractors, in particular, had travelled to source countries, providing information to workers about exploitative practices to watch out for, and informing them of correct procedures and timelines. This translated directly into lower fees being reported by these workers.

Working hours, rest and leave

The challenge: Compliance at follow-up audit for construction and auxiliary services contractors has decreased by 6%, to 76%. Compliance at the initial audit for the same group of contractors has also decreased, now at 69%. Issues related to excessive working hours and consecutive workdays without rest still persist within this sector.

The three hotels audited had numerous working hours issues. Common issues included overall hours worked per day, a number of consecutive days worked without rest, as well as lack of sufficient break times and failure to pay overtime. These issues apply to the wider hospitality sector and are common industry practice.

Progress: This year Impactt raised 33% fewer critical non-compliances for contractors involved in construction or auxiliary services. We raised a similar number of major non-compliances as in 2021 and raised 60% more minor issues in this topic area.

Treatment

The challenge: Average compliance scores for construction and auxiliary services remain high. However, they have decreased since last year – now at 84% at the initial audit (3% decrease) and 90% at the follow-up audit (4% decrease). Average compliance scores for hospitality providers were high at 87% for the initial audit and decreased to 86% at follow-up due to new issues raised.

This year our worker samples included a higher proportion of women than previously, owing to the inclusion of more hospitality sector contractors. In addition to this, workers were from a wider range of nationalities. Despite high compliance in this section – this year and historically – this year has seen an increase in the severity of the issues raised in this topic. This includes instances of discrimination, based on both nationality and gender.

⁵ This topic was formerly named 'Recruitment fees' in reports prior to 2020.

Progress: Overall compliance has remained high in this area throughout the years. Hospitality providers closed three of the four critical observations raised at the initial audit, showing an understanding of the issues at hand. It will be important for the four-tier audit system to adapt to the nuances and complexities of the different forms of harassment and discrimination that are more commonplace within this topic area, due to this increased diversity.

Conclusions

The SC has continued to improve on compliance results year-on-year, despite ongoing challenges of contracting companies in new sectors, and working in the wake of the COVID-19 pandemic. This is an important accomplishment, particularly as the SC focuses more on the hospitality sector.

Overall, issues per contractor increased slightly this year by 5%. Nevertheless, the overall severity of non-compliances raised has decreased, with a reduction in both critical and major non-compliances per contractor.

The SC is well poised to deliver a long-lasting legacy of the continued adoption of its WWS, by supporting its contractors and the State of Qatar to expand these into law and common practice. Impactt's analysis of the work of the SC's Workers' Welfare Department (WWD) has demonstrated that improving labour practices and worker satisfaction is possible at scale in Qatar. WWD has successfully piloted elements that go beyond QLL including elected worker representatives, grievance mechanisms, annual flights home and repayment of recruitment fees, to both SC and non-SC workers with the SC reporting a commitment amount of QAR 103.95 million to 31,220 SC and 18,066 non-SC workers, of which QAR 82.20 million has already been reimbursed to date. This has required significant investment in compliance monitoring, training and capacity building, and has delivered results throughout our 6 years of engagement. Most notably, the increased strength of enforcement of the WWS across this time has helped to ensure that these standards continue to be met in practice, and in some cases, have led to impacts beyond compliance.

The widespread adoption of SCURS in Qatar has helped to repay at least some of the historic unethical fees paid by workers. The commitment to pay to non-SC workers is an important aspect of the legacy that the SC can hope to achieve, through promoting this scheme (and indeed, its WWS) more widely across the country and region.

The scheme, whilst ground-breaking, could benefit from an updated methodology, as payments are made over a long period of time, do not reflect the differences in fees paid by nationality, and do not include inflation or interest on the payments made⁶. The ILO is currently considering recommendations along these lines. Both the State of Qatar and international entities abroad hosting similar events should consider this expanded approach to the repayment of recruitment fees and related costs, in addition to the measures towards prevention of payment noted in 'Pillar 2' below.

Key challenges still remain in reinforcing ethical recruitment to ensure that recruitment fees and related costs are prevented in labour source countries.

⁶ See the following guidance written by Impactt, which benefitted from consultation with 200+ public, private and international stakeholders, on repayment of recruitment fees: <https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/>. This guidance is currently under discussion at the ILO.

Recommendations

As the Tournament draws near, we have broadened the scope of our recommendations beyond the timeline of the FIFA World Cup 2022, so as to ensure the legacy of SC's valuable work.

Pillar 1 – Ensuring legacy

Focus SC efforts to:

1. Engage with stakeholders and peers within the market, particularly with those under WWS requirements, to share learnings, understand good practices and implement these moving forward
2. Continue to engage with other organising committees of international sporting or cultural events or major projects to share detailed learnings
3. Where recruitment fees are discovered within the hospitality sector, use the SC's influence to ensure that contractors implement an appropriate repayment scheme
4. Focus on good practices developed by contractors and communicate these to MoL for wider adoption

Support the State of Qatar to:

1. Adopt a strengthened approach to monitoring, grievance management, compliance and enforcement, learning from the SC's comprehensive due diligence programme and multi-tiered approach
2. Increase enforcement mechanisms across multiple sectors to drive compliance with QLL, intervention for critical issues such as delayed wage payment
3. Consider better regulation of the hospitality and services sector, particularly in relation to working hours and overtime payment
4. Increase standards of accommodation across Qatar to meet those of the SC WWS
5. Incorporate annual air-ticket allowances into QLL, in line with the SC WWS

Pillar 2 – Reinforcing ethical recruitment

Focus SC efforts to:

1. Continue to enforce and expand the ethical recruitment provision of the SC WWS to ensure in-depth ethical recruitment due diligence, to reduce and ultimately prevent the payment of recruitment fees. The SC can build on the successful cases of some 'good practice' contractors and ensure that workers have access to awareness sessions in origin countries, and a confidential hotline to report any issues of unethical recruitment during their recruitment journey. This can help reduce deception and intimidation of workers during their recruitment journey, prevent financial exploitation and reduce the financial burden of fee repayment on the contractor
2. Where recruitment fees are discovered within the hospitality sector, use the SC's influence to ensure that contractors implement an appropriate repayment scheme

Support the State of Qatar to:

1. Expand due diligence requirements over international recruitment to reduce the risk of future fee payments by migrant workers. This should include dialogue with sending countries to aid in implementing preventative measures to avoid fees being paid in the first place
2. Where, despite these best efforts, workers report paying fees, adopt the SC's Universal Recruitment Reimbursement Scheme across all sectors in Qatar. We recommend making a legal requirement on the employer to repay recruitment fees according to international best practice⁷, building upon and expanding on this successful innovation

Pillar 3 – Providing sustainable solutions to recurring problems

Focus SC efforts to:

1. Continue to focus efforts in training, awareness building, and dialogue sessions with contractors to promote a cultural shift across the key areas mentioned within this report. Such areas have flared up this year with the increased diversity of gender and nationality within the hospitality sector. In particular, take time to help contractors understand the reasons and benefits for effective worker dialogue mechanisms, including the importance of grievance logs, resolution and remedy, and increasing worker awareness of representatives and their roles

Support contractors to:

1. Gather data to understand the business impacts of better compliance and higher worker satisfaction, in terms of productivity and efficiency
2. Train middle-management staff on the purpose and benefits of the WWS, moving beyond compliance

Support the State of Qatar to:

1. Build the capacity of its Ministry to implement, monitor and regulate good labour practices across all sectors, and increase the knowledge base within government, with a view to replicating and scaling key achievements in workers' welfare

Support FIFA and other sports governing bodies to:

1. Apply and build on the SC's comprehensive workers' welfare and labour rights model with Local Organising Committees and other host nations

⁷ <https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/>

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.

Manuel Silva

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 sixth 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 to as "Qatar") and the world. 310 construction (and ancillary service) contractors and 13,574 workers⁸ 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 Standards⁹ and engaging in activities that go beyond WWS compliance.

The SC implements a four-tier auditing system against the WWS, which goes above and beyond the existing enforcement mechanisms in place related to the QLL - comprised of contractors' self-audits (first-party), comprehensive SC audits and inspections¹⁰ (second party), External Monitor audits (third party), and ad-hoc inspections conducted by the Ministry of Labour MoL).¹¹ The SC's audit and inspection regime are 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. The SC has committed considerable resources to work with contractors to implement the WWS and to verify compliance.

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 annually.¹²

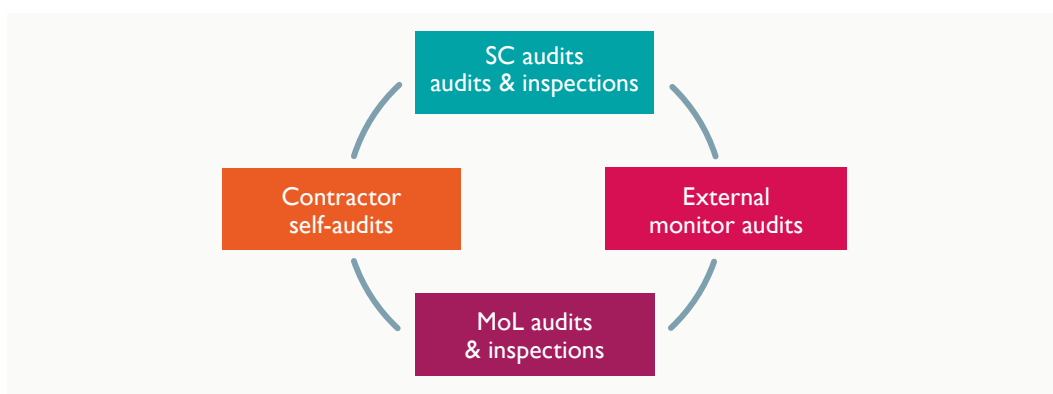


Figure 1 - SC four-tier audit system

⁸ Data as of December 2021.

⁹ 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). For more information refer to <https://www.qatar2022.qa/sites/default/files/documents/Workers-Welfare-Standards-Qatar-2022-EN.pdf>

¹⁰ Please refer to the SC's Annual Workers' Welfare Progress Report for further details.

¹¹ MoL audits follow Qatari labour law rather than the WWS.

¹² All reports are available on the SC's website: <https://www.workerswelfare.qa/en/news-and-reports>, accessed 22 February 2022.

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 report¹³ (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 report¹⁴ (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

¹³ <https://impacttlimited.com/wp-content/uploads/2017/01/SC-Annual-Report-Issue-3.2.pdf>

¹⁴ <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 report¹⁵ (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 MoL conducting a joint study with the ILO on the SC's work on WWF at ten contractors and participating in several subcommittees administered by MoL and the ILO
- Providing guidance on the design for WWF, conducting elections of 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

The 2020 annual report

In the 2020 annual report¹⁶ (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 that the total reimbursement by contractors to SC and non-SC workers could reach QAR 108.99 million (USD 30 million), over 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

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

Pillar 1 – Ensuring a positive legacy

Pillar 2 – Reinforcing ethical recruitment

Pillar 3 – Providing sustainable solutions to recurring problems

¹⁵ <https://impacttlimited.com/wp-content/uploads/2019/04/SC-Annual-Report-2019-Issue-2-digital.pdf>

¹⁶ <https://impacttlimited.com/wp-content/uploads/2020/07/IMPA09-2020-Qatar-Annual-Report-v1.2-Digital.pdf>

The 2021 annual report

In the 2021 annual report¹⁷ (covering January 2020 to February 2021) Impactt reported on progress made by the SC and made recommendations for further refinements of the SC's programme.

Impactt reported progress on:

- Resilience in the face of the COVID-19 pandemic, maintaining comparable compliance score results, year on year
- An overall decrease in issues per contractor and an increase in worker satisfaction to an all-time high over the four-year reporting period
- Success in further strengthening the implementation of SCURS, with some contractors extending this payment to non-SC workers

Impactt established the following recommendations, aligned to the pillars set out in the 2020 Roadmap:

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 MoL 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 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, to improve Ethical Recruitment outcomes

¹⁷ https://impacttlimited.com/wp-content/uploads/2021/10/IMPACTT-2021-Qatar-Annual-Report_Issue-2-1.pdf

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 MoL 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

The 2022 annual report

This annual report sets out Impactt's findings from audits conducted during the period June 2021 – January 2022. 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 contractors to comply with their Worker Welfare Standards (WWS). According to the SC, at its peak in 2020, the SC's WWS covered 32,136 workers¹⁸, about 1.5% of the 2.1 million migrant workers¹⁹ in Qatar. Currently, SC projects mobilise more than 13,574 workers or around 1% of the estimated one²⁰ million migrant workers employed in the construction sector in Qatar.

A shift in focus towards the hospitality sector

As the stadium construction phase is largely complete, the SC's focus has moved to host country related services and operations, with a focus on the hospitality sector.

The shift in focus towards this sector is reflected in our external monitoring sampling this year, which featured eight hospitality contractors. The hospitality sector has a different workforce profile and different standard working practices from the construction sector, which can be summarised as follows.

In our sample, the hospitality sector had a higher proportion of female workers (34% female) than the construction and auxiliary construction services sectors (5% female). Gender diversity brings many notable positives to a workforce, but it can also bring with it heightened risks of sexual harassment, and gender-based discrimination, (see breaches of the WWS as noted within the 'treatment' section of this report). The WWS was primarily designed with the construction sector in mind and whilst it contains some provisions for equal treatment regardless of gender²¹, these may warrant expansion.

The hospitality sector workforce tends to focus on candidates with English language skills which results in a different source country profile. The active workforce from which we drew our sample this year was far more diverse in terms of nationality than in previous years (please see Appendix 3). Whilst diversity can bring important positive aspects to a workplace, there is also a heightened risk of discrimination through different pay, hours, or job roles based on nationality, see section on 'treatment'.

This difference in countries of origin has also driven a change in findings regarding recruitment fees reported by workers this year, with a lower average reported, as noted in the 'Ethical Recruitment' section. It is important to note that SCURS has not yet expanded to the hospitality sector, although the SC reports that it is currently promoting this scheme amongst such contractors. Within the hospitality sector, it is common to see instances of direct hires, which reduces the risk of recruitment fees being charged to workers. However, hospitality contractors tend to engage with recruitment agencies when mass hiring is required, which can, in turn, equate to significant recruitment fees paid by workers.

¹⁸ <https://www.hrw.org/news/2021/08/02/migrant-workers-and-qatar-world-cup#>

¹⁹ <https://www.hrw.org/world-report/2020/country-chapters/qatar#>

²⁰ <https://www.hrw.org/world-report/2020/country-chapters/qatar#>

²¹ See, for example WWS 6.2b and 9.1a

The WW Standards were developed in consultation with several NGOs and stakeholders as universally applicable in principle. The detail of the standards has primarily been developed with the construction sector in mind. However, over the years the WWS has been applied to the service sector (i.e., catering, facility management, housekeeping, pantry services). In the lead-up to the Tournament, the SC's focus is shifting more towards the service and hospitality sectors and work is being done to enhance the relevance of the detail of the standards within this sector. For example, accommodation provided for hotel staff is often in villas, which our auditors found to be holistic of a higher standard than commonly provided in construction, whilst not necessarily meeting some detailed requirements which were designed for standard dormitory-style accommodation. Please refer to Appendix I for details of the monitoring methodology, including which parts have been adapted to the hospitality industry. It is important to note, therefore, that whilst compliance scores remain an important tool, direct comparison with prior years is not always useful.

The SC has reported facing various challenges in its work with the hospitality sector this year:

- Regulatory obstacles that hospitality contractors face regarding implementing the WWS at the organisation level
- The use of call-off contracts in the hospitality sector has reduced the SC's leverage
- Having had limited time to influence and build capacity amongst its hospitality supplier base
- The hospitality industry is recovering from COVID-19 effects that have limited their general capacities

Implementation of National Law

In our 2021 report, we noted that the State of Qatar had made important changes to national law. This included the introduction of a minimum wage at QAR 1,000 (USD 275) and the dismantling of the 'No-objection certificate' (NOC) requirement. Our monitoring cycle this year found:

- Minimum wage: No instances were found of contractors failing to comply with new minimum wage laws. The impact of this has been an increase of 25% in basic wage for SC workers across all sectors, up from the former unofficial temporary basic wage of QAR 750 (USD 220) in Qatar, which the SC had required of its and had been effective in enforcing. Three hotels in this year's sample were paying above this new minimum, paying a minimum of QAR 1,400 (USD 385) to all workers
- Dismantling of the 'No-objection certificate' (NOC) requirement: A law requiring a worker to receive a letter of permission from their employer to change jobs was abolished in 2020²², intending to eliminate this barrier to resignation. Our audits found three contractors where NOCs were still presenting a barrier to resignation (please see the 'End of Service' section)

²² Please refer to p.18 of our 2021 Annual Report: https://impacttlimited.com/wp-content/uploads/2021/10/IMPA11-2021-Qatar-Annual-Report_Issue-2.pdf

It is a legal requirement for people moving to Qatar long-term to undergo an HIV test. People found positive are denied a work visa and are deported if found positive²³. This year, we found one worker who tested positive for HIV during his recruitment journey medical screening in his home country and was subsequently denied a job placement.

Ongoing challenges related to COVID-19

The COVID-19 pandemic has continued to affect personal and business life globally. Migrant workers across the world have been particularly vulnerable to health, financial and human rights impacts. In Qatar, at certain times workers faced COVID-19-related safety measures. In Qatar, contractors were required to adhere to government guidelines on COVID-19 restrictions. As we found last year, at times these continued to affect freedom of movement outside worker accommodation, the ability to conduct regular elections of worker representatives, and updates to Qatar Identity cards (QIDs). Whilst some Worker Welfare Forums continued to operate, on some occasions we found that meetings were poorly managed or poorly communicated, without effective discussions or grievance management. The Covid pandemic had some obvious impact with some contractors running virtual elections and others responding by appointing representatives. Workers did however become more able to travel home for annual leave, although many reported that the costs of quarantine were too high, and therefore chose not to do so²⁴.

Workers report being impacted by the continued closure of computer rooms and other recreational facilities at accommodation sites due to COVID-19. Coupled with this, Impactt has noted a decrease in the provision of free Wi-Fi at accommodation facilities. Workers' access to Wi-Fi is important, as without it they feel isolated from communicating with their families at home, (exacerbated by COVID-19-related travel restrictions) and they often end up paying high fees for mobile data packages. Workers appear to face discrimination here, since similar common spaces (internet cafes, gyms, etc.) elsewhere in Qatar are open, requiring vaccine status on entry.

Continuing from last year's approach, we categorised findings 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.

Stakeholder views

Media commentary and scrutiny have intensified with less than one year to go until the Tournament, with a particular emphasis on human rights. Stakeholders have continued to focus on ethical recruitment issues²⁵. Human Rights Watch acknowledge the 'additional protections' the SC's WW Standards have provided for workers, which "...have led to better working conditions", noting as well that they only apply to about 1.5% of the migrant workforce²⁶.

23 <https://www.hivtravel.org/Default.aspx?PageId=143&CountryId=147#:~:text=There%20is%20no%20HIV%20testing%20upon>

24 Currently, contractors are only required to pay for quarantine packages for new hires.

25 See, for example:

<https://www.hrw.org/news/2021/12/18/qa-migrant-worker-abuses-qatar-and-fifa-world-cup-2022#Q6>

<https://www.sportsintegrityinitiative.com/allegations-of-worker-abuse-continue-to-blight-qatar-2022/>

<https://www.aljazeera.com/news/2021/7/14/ngo-accuses-qatar-luxury-hotels-labour-abuses>

26 <https://www.hrw.org/news/2021/08/02/migrant-workers-and-qatar-world-cup>

Commentators and media outlets including activists, the ILO, and others also continue to raise awareness about the investigative procedures and publicly available reporting on causes of worker deaths²⁷. An in-depth study by the ILO has collected significant amounts of data on occupational injuries in Qatar²⁸. The ILO have recently also requested "...better quality and more accurate data collection, with more efforts to investigate injuries and fatalities that may be work-related but are not currently categorized as such"²⁹. In Qatar, the Ministry of Labour and the Ministry of Public Health signed a Memorandum of Understanding to improve data collection and analysis on workers' health and safety³⁰.

- 27 See, for example:
https://www.ilo.org/wcmsp5/groups/public/-arabstates/-ro-beirut/-ilo-qatar/documents/publication/wcms_828395.pdf
https://www.theguardian.com/global-development/2021/nov/18/we-have-fallen-into-a-trap-for-hotel-staff-qatar-world-cup-dream-is-a-nightmare?CMP=Share_iOSApp_Other
<https://twitter.com/ncgeehan/status/1460846333020053505?s=21>
- 28 https://www.ilo.org/wcmsp5/groups/public/-arabstates/-ro-beirut/-ilo-qatar/documents/publication/wcms_828395.pdf
- 29 <https://edition.cnn.com/2021/11/19/football/qatar-world-cup-2022-ilo-investigation-spt-intl/index.html>
- 30 <https://www.dohanews.co/qatar-to-improve-data-collection-on-workers-deaths-after-amnesty-report/>

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.



³¹ <https://www.qatar2022.qa/en/news/sc-releases-fourth-annual-workers-welfare-progress-report-32>

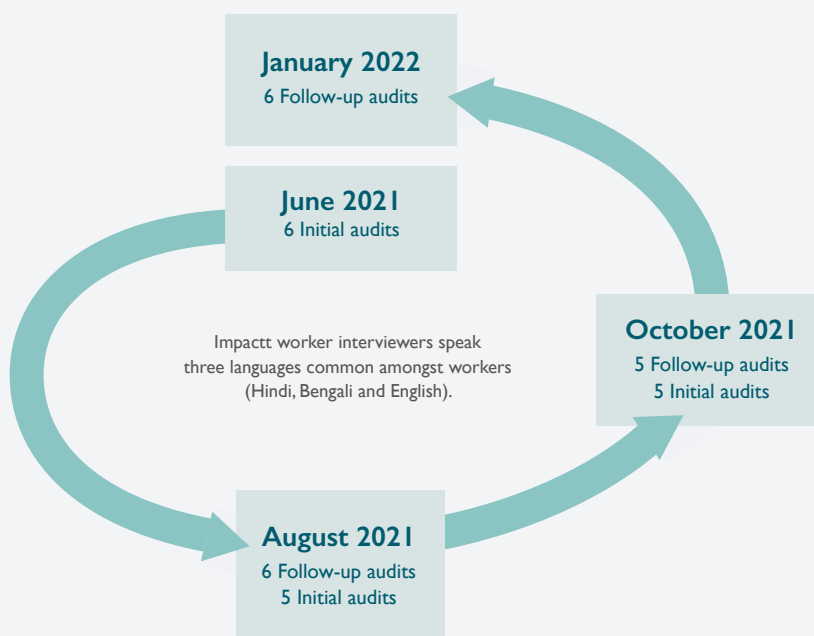
³² https://www.workerswelfare.qa/sites/default/files/reports_item/field_document/sixth-annual-workers-welfare-progress-report-december-2020-en.pdf

Impactt's External Compliance Monitoring Programme

Scope of Impactt's work

	2017	2018	2019	2020	2021	2022
Contractors audited	10	14	24	22	12	16
Worker interviews	253	679	1109	951	394	573
Person days in the field	90	152	334	336	212	244

Auditing activities in scope of the annual report 2022:



SC's Scope contractors and tiers			
310 Total contractors on SC projects			
Main contractors: 147	Impactt sample: 16 Contractors audited (5%)		
Tier 1: 146	Main contractors	Tier 1	Tier 2
Tier 2: 17	8 (2.5%)	8 (2.5%)	0 (0%)
Tier 3: 0			

SC's Scope workers and main nationalities			
13,574 Total workers of 72 nationalities on SC projects			
Indian: 40%	Impactt sample: Worker interviews 573 (4%)		
Bangladeshi: 19%	Indian	Bangladeshi	Nepali
Nepali: 16%	30%	9%	26%
Other: 25%			36%

Many of the construction projects within the SC's portfolio have been completed, and the SC's focus on hospitality will further expand within this delivery phase. This year Impactt's sample is representative of this new scope. Impactt sampled:

- Eight hospitality contractors, comprising: Three large, multinational global hotel operators; Three hospitality services providers (two in cleaning and one in catering); Two Tournament Bus Services (TBS) which engage with the SC on call-off contracts during tournament months only (Arab Cup in December 2021 and World Cup in November 2022)
- Four construction contractors
- Three construction auxiliary services contractors (with maintenance and safety specialisations)
- One manpower contractor, providing ad-hoc labour

*Please see Appendix 3 for further details.

The above figure reflects the total number of contractors audited overall, as well as the total number of workers interviewed with a breakdown per nationality. The figure below represents the breakdown of contractors audited per tier and workers interviewed in the construction and auxiliary services sector.

SC's Scope - construction and auxiliary services contractors and tiers				SC's Scope - construction and auxiliary services workers and main nationalities				
231 Total contractors on SC projects				7,255 Total workers of 58 nationalities on SC projects				
Main contractors: 109	Impactt sample: 8 Contractors audited (3%)			Indian: 33%	Impactt sample: Worker interviews 196 (3%)			
Tier 1: 105	Main contractors	Tier 1	Tier 2	Bangladeshi: 28%	Indian	Bangladeshi	Nepali	Other
Tier 2: 17				Nepali: 20%				
Tier 3: 0	2 (<1%)	6 (3%)	0 (0%)	Other: 20%	37%	10%	30%	23%

The figure below shows the same breakdown for the hospitality sector:

SC's Scope - Hospitality contractors and tiers				SC's Scope - Hospitality workers and main nationalities				
79 Total contractors on SC projects				6,319 Total workers of 72 nationalities on SC projects				
Main contractors: 38	Impactt sample: 8 Contractors audited (10%)			Indian: 46%	Impactt sample: Worker interviews 377 (6%)			
Tier 1: 41	Main contractors	Tier 1	Tier 2	Bangladeshi: 5%	Indian	Bangladeshi	Nepali	Other
Tier 2: 0				Nepali: 12%				
Tier 3: 0	6 (8%)	2 (3%)	0 (0%)	Other: 36%	27%	8%	24%	42%

Findings

This section sets out the overall results of Impactt's assessment of 16 contractors during the period June 2021 – January 2022, together with the results of the worker satisfaction surveys. For this report, we refer to this reporting period as either '2022' or 'this year'.

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

Compliance findings³³

Figure 3 below summarises this year's average compliance scores by topic area³⁴. The findings are organised by the audit section, following the worker's journey³⁵. Each of these sections covers relevant SC WWS and Qatar Labour Law³⁶ requirements.

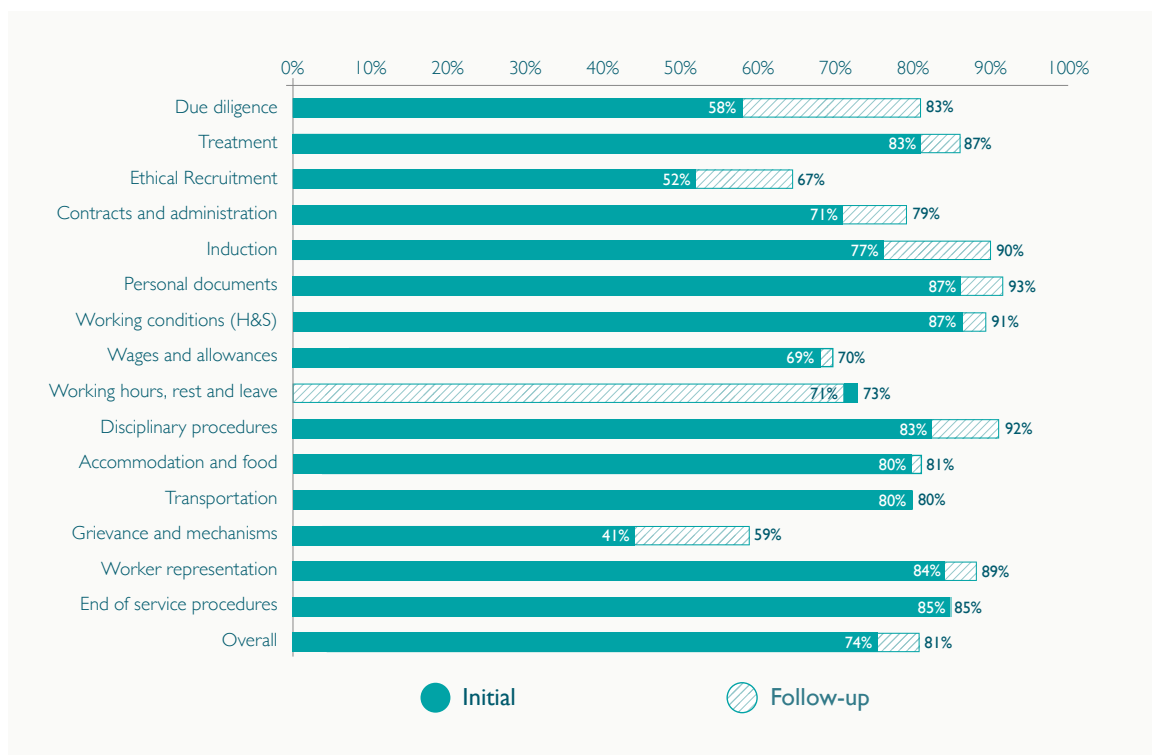


Figure 2 - Summary across all contractors of average compliance score by topic, 2022

³³ 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.

³⁴ Please refer to Appendix 1 for details on the Topic Areas.

³⁵ 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.

³⁶ 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.

The average overall initial audit compliance rate across the 16 contractors audited this year was 74%. During the follow-up audit, the average score increased to 81% - the same as in 2021. This compares with an overall average initial score of 72% and a follow-up of 81% in 2021. The rise in initial compliance scores is a positive sign that the SC continues to be able to apply the WWS to its contractor base. This is despite the challenges of both the shift from construction towards the hospitality sector and the ongoing difficulties and restrictions presented by the continuing COVID- 19 pandemic.

Contractors scored well on worker treatment, personal documents, working conditions, disciplinary procedures, accommodation, worker representation and end of service topics, with a high average compliance score (80% and above) during the initial audit.

Ethical recruitment and grievance mechanisms remained a cause for concern, with low average initial compliance (52% and below) during initial audits. In particular, average compliance scores on grievance mechanisms decreased from 58% in 2021 to 41% this year at the initial stage³⁷. Compliance on wages and allowances have also seen a decrease from 86% compliance to 70% at follow-up audit, compared with last year.

Contractors were able to close out or make progress on 49% of issues³⁸. This is lower than last year (70%) and 2020 (63%). In the areas with the lowest scores, ethical recruitment and grievance, contractors made the most notable progress, as ethical recruitment saw a 15% increase between initial and follow-up audit and grievance mechanisms saw an 18% increase. Due diligence was also an area in which contractors made good progress, with an increase of 25% to an average score at follow-up of 84%.

The areas with the lowest progress made from initial to follow-up are treatment, wages and allowance and accommodation. This is partly due to high compliance scores at initial audits, providing fewer opportunities for issue closure. Transport and end of services remained the same, with no average improvement observed from initial to follow-up. End of service procedures saw a 1% increase while treatment, wages, and allowances both observed a 2% improvement between initial and follow-up audits. Compliance scores for end of service procedures have reached 88%, their highest ever level.

³⁷ This decrease is somewhat contradictory to the 'worker satisfaction' section, which notes that 96% of workers were aware of the SC hotline. This particular check (covering awareness of grievance mechanisms, which includes the SC hotline) scored particularly highly this year in our compliance findings, whilst the remainder of checks within this topic area scored comparatively low.

³⁸ 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.

Construction and auxiliary services sector

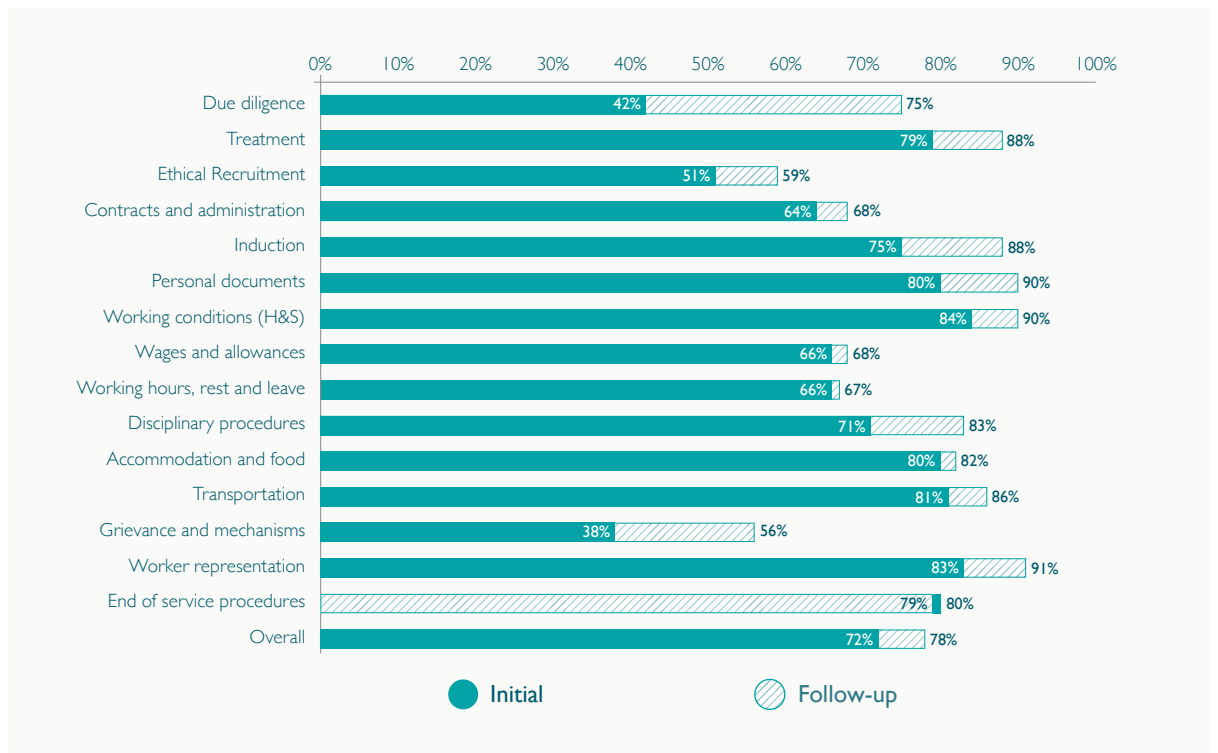


Figure 3 - Summary across construction and auxiliary services contractors of average compliance score by topic, 2022

By comparison, the construction and auxiliary services sector saw lower initial and follow-up average scores of 72%, and 78% respectively. Most topic areas either saw scores at comparative levels or lower than those in the hospitality sector, as noted in the section below.

Notwithstanding the lower scores, progress between initial and follow-up was generally better in this sector than in hospitality. The greatest improvements were seen in the following topic areas: due diligence (33% increase at follow-up); induction (13% increase at follow-up); personal documents (10% increase at follow-up); disciplinary procedures (12% increase at follow-up) and disciplinary procedures (12% increase at follow-up).

Hospitality sector

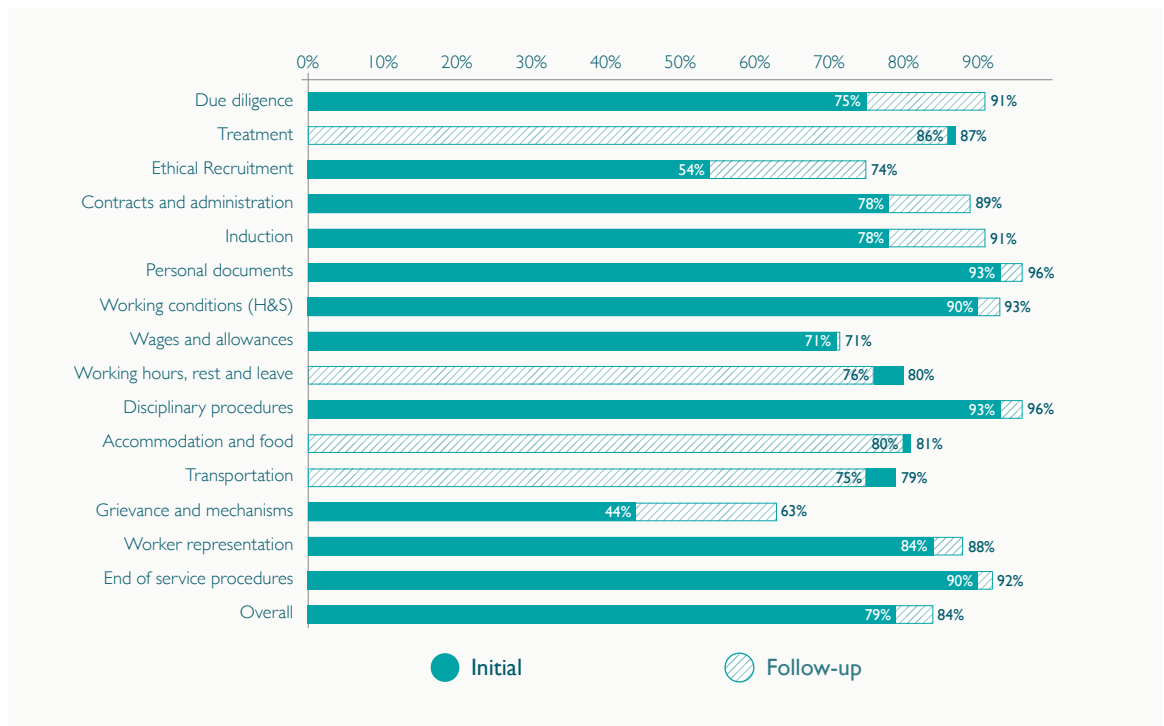


Figure 4 - Summary across hospitality sector contractors of average compliance score by topic, 2022

Disaggregating by sector, hospitality saw an initial average score of 79% and an average at follow-up of 84%, both of which were higher than the construction and auxiliary services sector, at 72% and 78% respectively.

Compared with the construction and auxiliary services sector, the following topic areas saw the most significant differences in terms of higher average scores at the time of follow-up audits: due diligence (16% higher), ethical recruitment (15% higher), contracts and administration (21% higher), disciplinary procedures (17% higher), and End of Service procedures (13% higher).

It is important to note that, despite being relatively higher, scores in some areas dropped overall between initial and follow-up, in the areas of treatment; working hours, rest and leave; accommodation and food and transportation. This is due to a combination of new issues being discovered at follow-up; new areas of our audit checklist becoming applicable only during follow-up, where these had been 'not applicable' at initial; and upgrading in some cases of 'observations' to 'non-compliances' at follow-up, for example where observed risks of pending non-compliances at initial audit had not been adequately addressed and had manifested into non-compliances at the time of follow-up.

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 slightly higher number of total issues per contractor (47 in 2021, 49 in 2022). Impactt found slightly fewer major and critical non-compliances per contractor than last year (0.81 critical and 8 major per contractor on average, compared to 0.92 and 11 respectively last year), but a 15% increase in minor non-compliances raised per contractor.

	2018 Report		2019 Report		2020 Report		2021 Report		2022 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 (%)	Average # issues per contractor	Closed & progress made (%)
Contractors Audited	24		24		22		12		16	
Critical NCs	1.16	36%	0.75	100%	0.95	61%	0.92	56%	0.81	38%
Major NCs	7.68	51%	11.2	74%	10.73	74%	11.17	78%	8.25	48%
Minor NCs	21.84	62%	32.41	69%	32.45	56%	24.58	65%	28.75	51%
Total NCs	30.68	58%	44.38	70%	44.14	60%	36.67	69%	37.81	50%
Critical OBs	0.89	35%	0.71	88%	1.05	80%	1.58	79%	1.87	50%
Total OBs	7.89	57%	11.79	75%	8.18	74%	10	76%	10.06	48%
Total issues	38.58	57%	56.16	71%	53.45	63%	46.67	70%	48.87	49%
Total critical issues	2.05	36%	1.46	94%	2	72%	2.5	70%	2.68	47%

Table 1 - Overall follow-up improvement by year

Key			
≥0≤25%	≥26≤50%	≥51≤75%	≥76≤100%

The table above shows overall improvement by year for all sectors combined. Similar to last year, 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 raised an average of 10 observations per contractor, the same as last year. We saw an increase in critical observations from 1.5 per contractor to nearly 2 on average, the highest to date.

The number of issues per contractor (both non-compliances and observations) raised has increased this year, on average. This is due to the increase in minor issues. The total number of critical and major issues raised per contractor have decreased compared to the past two years.

Contractors' ability to make progress on and/or close issues, across all levels of severity, was more limited this year. This can be attributed to the following factors:

- There were two particularly low-scoring contractors in our sample this year, both within the construction sector. These two contractors accounted for 24% of total critical and major issues raised this year (37 out of a total of 155) and were only able to make progress or close out 11 of these (30%), dragging averages down
- Major and critical issues raised at hospitality providers audited were common in working hours rest and leave which saw particularly low closure rates (3 out of nine closed or progress made). Hotels reported having difficulties in recruitment due to travel restrictions and consequently being short-staffed. They reported that this was further exacerbated in the face of COVID-19 outbreaks at their accommodation over the peak seasons during summer and the Arab Cup (December 2021), and this correlates with their inability to close excessive hours issues as a result
- This year, similar to last 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 updated 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')

Construction and auxiliary services sector

The following table displays year on year improvement including this year's construction and auxiliary services contractors. The rate of critical issues raised per contractor was at an average of one critical non-compliance raised – the highest since 2018. Contractors' ability to close or make progress on these critical issues raised was at an all-time low, with a closure rate of 13%. The average rate of critical observations for this sector was at its highest in the past five years of reporting, with an average of 1.63 raised per contractor, and closure rates here were comparatively low at 38% as well. Contractors in this sector were unable to close or show progress made on most critical issues raised, with 24% of issues raised marked as closed or progress made at follow-up audit.

	2018 Report		2019 Report		2020 Report		2021 Report		2022 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 (%)	Average # issues per contractor	Closed & progress made (%)
Contractors Audited	24		24		22		12		16	
Critical NCs	1.16	36%	0.75	100%	0.95	61%	0.92	56%	1	13%
Major NCs	7.68	51%	11.2	74%	10.73	74%	11.17	78%	9.75	46%
Minor NCs	21.84	62%	32.41	69%	32.45	56%	24.58	65%	31.38	49%
Total NCs	30.68	58%	44.38	70%	44.14	60%	36.67	69%	42.13	48%
Critical OBs	0.89	35%	0.71	88%	1.05	80%	1.58	79%	1.63	38%
Total OBs	7.89	57%	11.79	75%	8.18	74%	10	76%	7.75	43%
Total issues	38.58	57%	56.16	71%	53.45	63%	46.67	70%	53.88	44%

Table 2 - Construction and Auxiliary Services sector Overall follow-up improvement by year

Hospitality sector

The following table displays the performance of hospitality contractors audited this year. This year Impacttt raised a comparatively low number of critical non-compliances in the hospitality sector; with an average of 0.63 raised per contractor; compared to 1 per construction and auxiliary services contractor. Closure rates for critical non-compliances raised this year were high, with contractors in this sector able to close or make progress on 80% of critical issues raised. Indeed, closure rates across all issue severities were higher within this sector; compared with construction and auxiliary services.

	2022 Report	
	Average # issues per contractor	Closed & progress made (%)
Contractors Audited	16	
Critical NCs	0.63	80%
Major NCs	6.875	49%
Minor NCs	26.38	52%
Total NCs	33.88	52%
Critical OBs	2.12	59%
Total OBs	12.13	51%
Total issues	46.75	51%
Total critical issues	2.75	64%

Table 3 - Hospitality sector overall follow-up improvement

Satisfaction

Worker satisfaction saw a decrease this year for the first time since we began our worker surveys for the 2018 report. This year, workers reported a 16% decrease in satisfaction from 4.3/5 to 3.7/5.

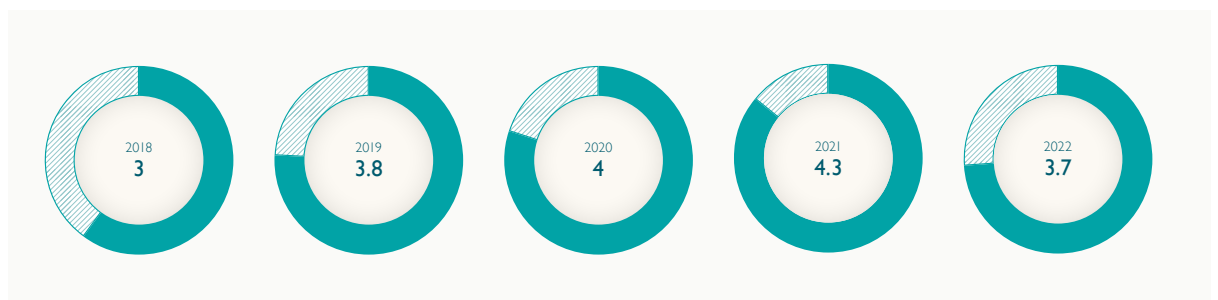


Figure 5 - Overall satisfaction of workers interviewed in initial audits on a scale of 1 - very unhappy to 5 - very happy

Of 528 survey respondents³⁹, 312 (59%) reported being satisfied (4) or very satisfied (5) with their job. This compares to 79% last year. Of those 13 who were very dissatisfied (2.5%), these were spread across both hospitality and construction and auxiliary service sectors. 326 (62%) of respondents reported that they would recommend the job to a friend, and these were also evenly spread across sectors.

³⁹ 176 in construction and services, 352 in hospitality.

Figure 6 below shows overall satisfaction for workers in the construction and auxiliary sector. This year, overall satisfaction sits at 3.5 out of 5. This is a decrease from last year's overall satisfaction of 4.3 out of 5 for all workers interviewed.

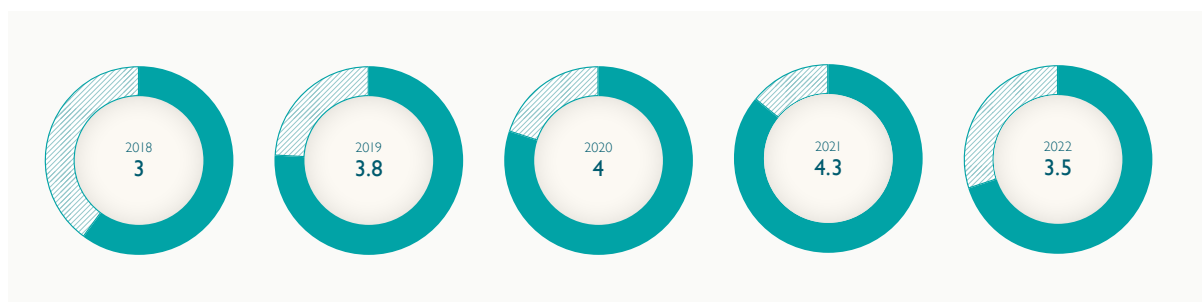


Figure 6 - Overall satisfaction of construction and auxiliary sector workers interviewed in initial audits on a scale of 1 - very unhappy to 5 - very happy

As displayed in Figure 7 below, overall satisfaction scores for workers in the hospitality sector is 3.8 out of 5. This is the first year that Impacttt has disaggregated data for hospitality workers. We expect to build on this data and be able to compare trends in the next Annual Report 2023.

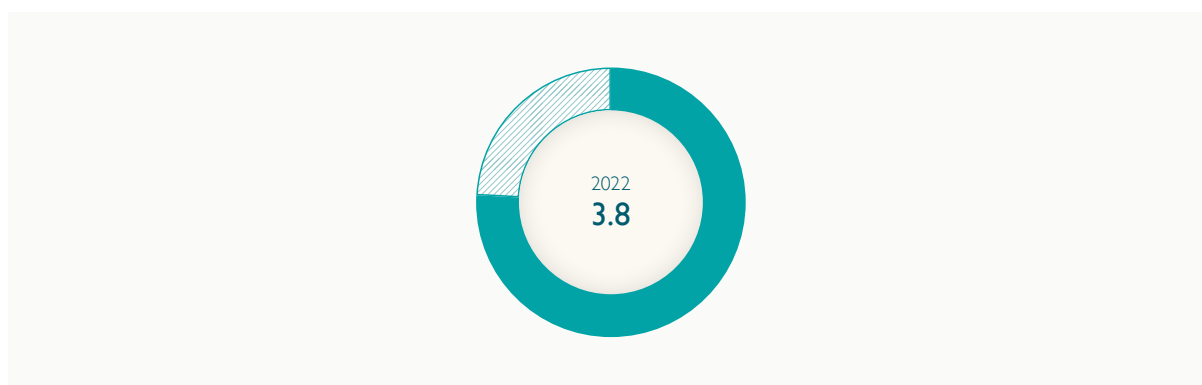


Figure 7 - Overall satisfaction of workers interviewed from the hospitality sector in initial audits on a scale of 1 - very unhappy to 5 - very happy

As usual, this year, workers highlighted stable income and safe conditions as most important in overall job satisfaction. Workers generally were also satisfied with their accommodation and were particularly happy to have moved into less crowded rooms of 4 or fewer people in cases where they had previously worked on non-SC projects without such requirements. Free Wi-Fi and recreational facilities were also cited as important to satisfaction, being most highly brought up in semi-structured interviews as 'dislikes' by workers where these were not provided despite being a requirement.

Awareness of, and trust in grievance mechanisms was also high, with 96% of workers we interviewed being aware of the SC's grievance hotline⁴⁰. Across the sample, satisfaction with safety and respect remained high, at 91% this year (compared to 93% last year). The main reason for the overall decline was due to a decrease in satisfaction with income.

⁴⁰ As noted in the introduction to the 'findings' section, this does not correlate with overall compliance scores on grievance mechanisms, which were low, despite good compliance in the checks for awareness of grievance mechanisms (including the SC hotline) by workers.

- **Wages and allowances:** Satisfaction with income saw an overall satisfaction score of 30%. Fewer workers (41% compared to 68% last year, and 56% in 2020) report that they earn enough each month to pay for their families' basic needs. This is despite all workers interviewed this year receiving at least the new higher minimum wage of QAR 1,000 (USD 275) – compared to 68% receiving this last year. In the hospitality sector specifically, 24% of workers reported that they are satisfied with their income, vs. 40% of workers in construction and auxiliary services. This is despite this sector paying a higher minimum basic salary on average, with three hotels paying a basic wage of QAR 1,400 (USD 383) before overtime
- **Being treated differently to colleagues who do a similar job:** 45 workers felt that they were treated differently to colleagues who do a similar job to them. Of these, 39 (87%) were in the hospitality sector. Please see the 'Treatment' section for further details and examples
- **Existing or perceived barriers to resignation:** 94 workers (18%) reported that they did not feel they could leave their jobs if they wanted to resign. 53 of these were in the construction and auxiliary services sector, representing 30% of the overall survey respondents of that sector. The most common reasons reported by these 94 workers were (a) a belief that they would need to fund their flight costs or miss out on the end of service benefits (38% of these 94 workers), and (b) Lack of NOC or permission due to company policy presents a contractual barrier (35% of these 94 respondents). Please see the 'End of Service' section for further details

Haruun⁴¹ came to Qatar ten years ago. The tips he receives from customers made up a large part of his income. His income covers the family's essential living expenses and pays for his children's school fees. Due to staff shortages, his employer changed his role without consultation. Now, his monthly earnings barely cover his family's essential living expenses. Unlike before, he can no longer save for the future. He feels very anxious about the months ahead.

⁴¹ 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 severity⁴² and prevalence⁴³ of issues has resulted in different priority areas being focused on in our 'findings' section. It is important to note that the compliance score with a topic area does not necessarily correlate with its severity or prevalence⁴⁴.

Severity and prevalence were comparable across both sectors, and therefore the below graph is representative of the entire sample of 16 contractors this year.

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

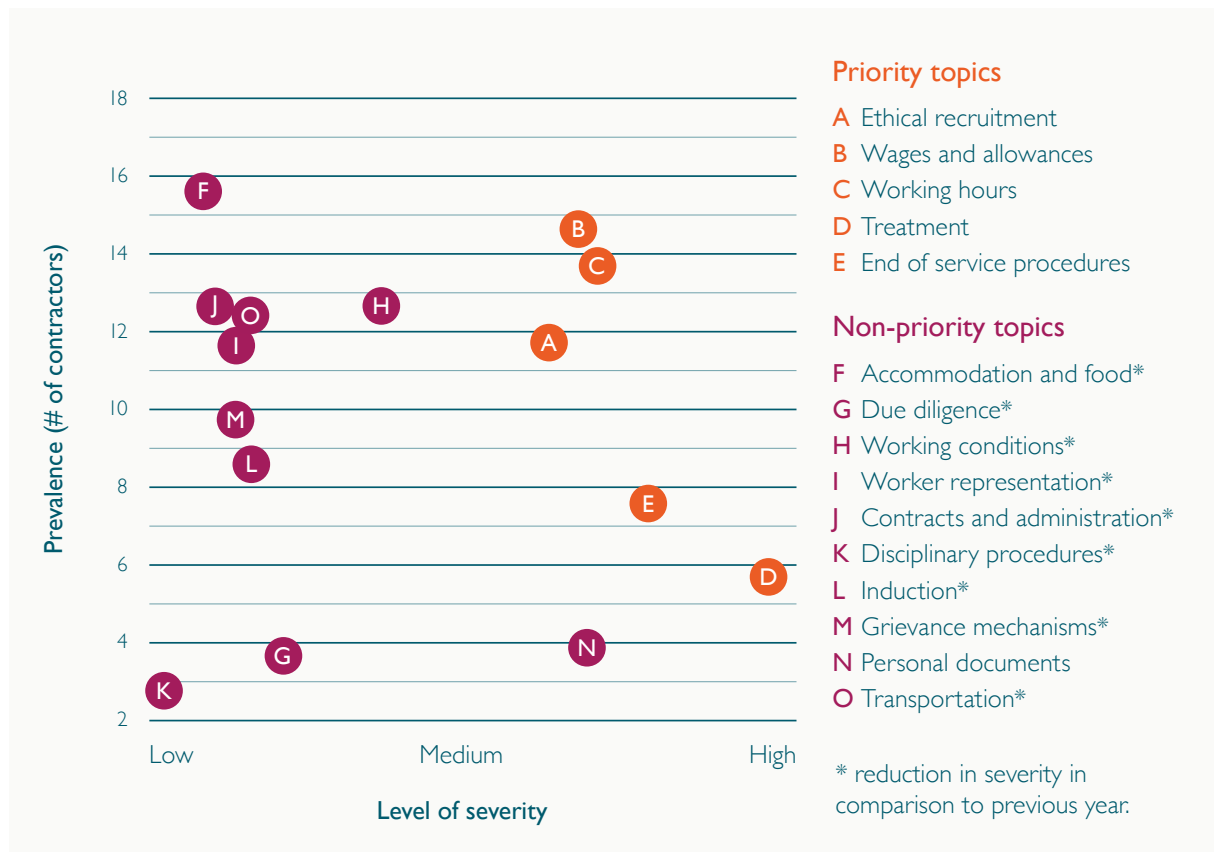


Figure 8 - Priority topics

42 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.

43 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.

44 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 recruitment⁴⁵

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 MoL (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)

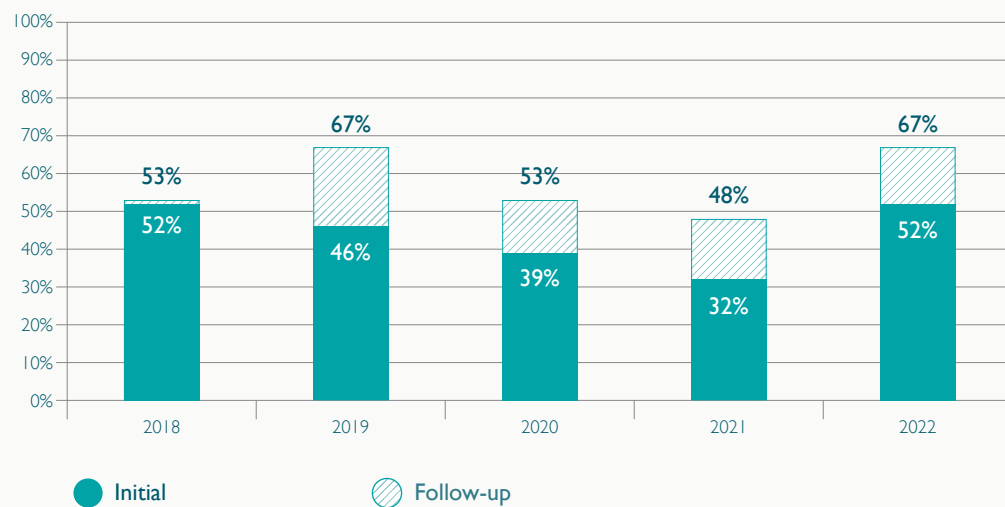


Figure 9 - Ethical Recruitment: Compliance

⁴⁵ This topic was formerly titled 'Recruitment Fees' in 2020 and prior. It has been renamed to reflect the wider mandate which is covered within this topic.

Common findings

Compliance results in ethical recruitment have seen an improvement overall this year. This is due largely to improvements on aspects including contract wording, receiving signed confirmations of compliance from agencies, and using MoL-registered agencies, all of which are system-related.

However, workers still have a limited understanding that they should not pay fees, and there has been little change by contractors in the effective identification of amounts where fees have been paid.

Although compliance results at the initial audit improved this year, ethical recruitment is still the highest priority topic. Issues remained open at the follow-up stage related to ethical recruitment at 12 of the 16 contractors audited. There was a similarly high level of severity – with 22 major and critical issues (and 14 minor) identified at these contractors which remained unresolved. This was due in part to two particularly poorly performing contractors within our sample (noted in the 'findings' section above), as well as a higher proportion of hospitality providers in the sample. These were newly contracted to the SC and had therefore had a comparatively shorter time to implement the WWS in this area.

Context of ethical recruitment

Globally, ensuring zero cost recruitment of migrant workers remains a significant challenge, although reimbursement of historic fees paid is becoming even more widespread. In 2017, the SC launched the Universal Reimbursement Scheme (SCURS) that requires contractors to reimburse workers their recruitment fees, if they are unable to prove they hired them ethically. Although this is not an official WWS requirement, the SC reports that 266 contractors have committed to this scheme, which has resulted in the commitment to pay QAR 103.95 million (equivalent to USD 28.4 million) to 31,220 SC and 18,066 non-SC workers⁴⁶. This is likely the largest-scale repayment in the construction industry and marks an important milestone in the implementation of remedies for migrant workers. SCURS laid the foundations for repayment models which have been further developed in other geographies and sectors⁴⁷, and for the development of multi-stakeholder approaches towards repayment of recruitment fees⁴⁸. It is important to note that this scheme has not yet expanded to the hospitality sector, for which we conducted eight audits during this year's monitoring cycle. There is an opportunity for the SC to use its influence to ensure that contractors implement SCURS or another appropriate repayment scheme.

The widespread adoption of SCURS in Qatar has helped to repay at least some of the historic unethical fees paid by workers. The scheme, whilst ground-breaking, could benefit from an updated methodology, as payments are made over a long period,

⁴⁶ https://www.workerswelfare.qa/sites/default/files/reports_item/field_document/sixth-annual-workers-welfare-progress-report-december-2020-en.pdf

⁴⁷ See, for example, <https://thediplomat.com/2021/09/debt-bondage-payouts-flow-to-workers-in-malaysias-glove-industry/>

⁴⁸ See the following guidance written by Impactt, which benefitted from consultation with 200+ public, private and international stakeholders, on repayment of recruitment fees: <https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/>. This guidance is currently under discussion at the ILO.

do not reflect the differences in fees paid by nationality, and do not include inflation or interest on the payments made⁴⁹. The ILO is currently considering the adoption of recommendations along these lines. Both the State of Qatar, and international entities abroad hosting similar events, have an opportunity to consider this expanded approach to the repayment of recruitment fees and related costs, in addition to the measures towards prevention of payment noted throughout this section, and in 'Pillar 2: Reinforcing Ethical Recruitment' within the conclusions and recommendations.

Looking beyond remedy to prevention, the WW Standards require contractors to take certain actions towards ethical recruitment, as noted at the start of this section. Notwithstanding this, more can be done for the WWS to make a significant impact in reducing the prevalence of unethical recruitment, by expanding requirements to encourage enhanced due diligence over recruitment agencies, taking note of 'best practices' employed by some of the SC's existing contractors, as well as responsible recruitment approaches globally with a greater focus on source-country engagement. Please see 'Conclusions and Roadmap Recommendations: Pillar 2 – Reinforcing Ethical Recruitment' for further details.

Construction and auxiliary services

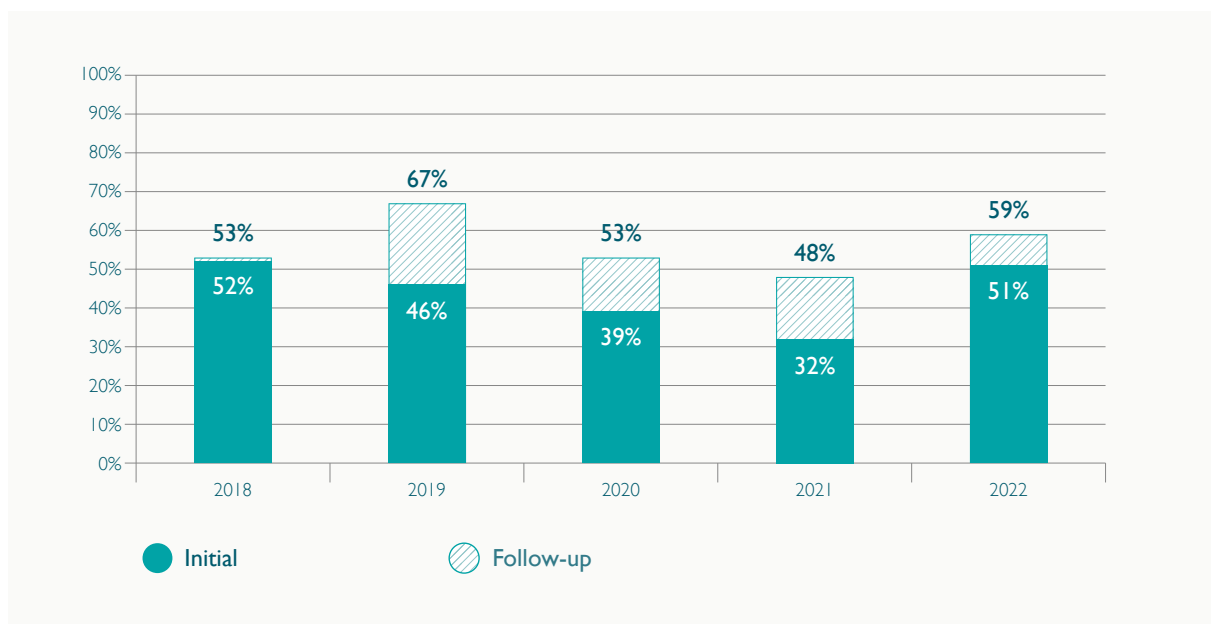


Figure 10 - Construction and auxiliary services: Ethical Recruitment: Compliance

Contractors within the construction and auxiliary services sector scored on average 51% at the initial audit and 59% at the follow-up audit. This is an increase compared to last year, which saw an average of 32% and 48% respectively.

⁴⁹ See the following guidance written by Impactt, which benefitted from consultation with 200+ public, private and international stakeholders, on repayment of recruitment fees: <https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/>. This guidance is currently under discussion at the ILO.

Impactt identified the following major non-compliances this year, specific to this sector:

- At the initial audit, workers at 7 of 8 contractors were not informed during recruitment that they should not pay recruitment fees
 - At 2 of these contractors, awareness sessions were effective in informing workers that fee-charging is not permitted and that they could speak to management about any fees which they had paid. At the remaining five contractors, no effective action had been taken within recruitment processes, and existing workers were still unaware that fees should not have been paid in the first place
- 4 out of 8 contractors had not identified whether workers had paid fees at the initial audit
 - Two contractors were able to close this issue at follow-up, by speaking with workers and accurately identifying the levels of fee payment they had made
 - Two introduced the new starter checklist, although at both contractors this was found to be filled in by management instead of by workers. The checklists showed that zero fees had been paid despite the workers reporting fee payments to our worker interviewers
- 2 of 8 contractors did not have robust processes for verification of receipts and reimbursement
 - At both contractors, whilst there were new policies and procedures which stated such a system had been introduced, their effectiveness could not be verified. Investigations were not conducted by contractors into fee payments because no workers had presented proof of payment⁵⁰
- 1 out of 8 contractors did not have robust processes to ensure that all related costs of recruitment were covered by the employer
 - Workers reported having paid such fees, which had not been reimbursed by the contractor at the initial audit. Workers had not yet been fully reimbursed by the time of the follow-up audit

⁵⁰ WWS 6.9 requires contractors to investigate and reimburse workers in the case of proof of payment of recruitment fees. However, such proof is rare for workers to have in their possession (only 14% of those reporting fees this year had any proof).

Hospitality sector findings

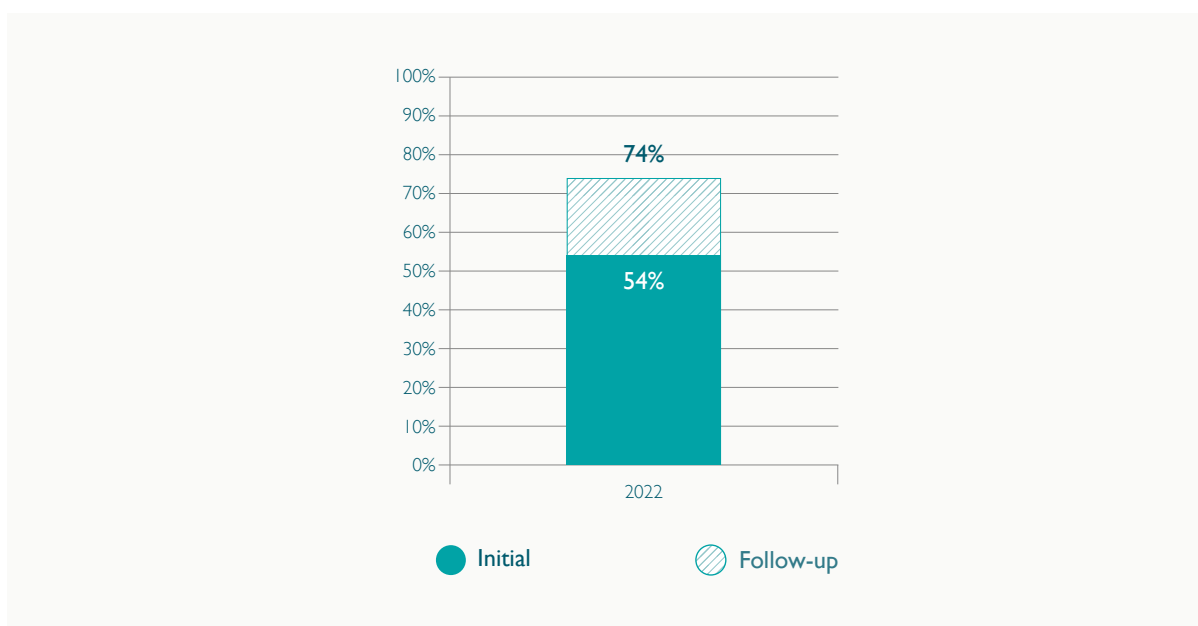


Figure 11 - Hospitality sector: Ethical Recruitment: Compliance

Contractors within the hospitality sector scored on average 54% at the initial audit and 74% at the follow-up audit. Initial audit scores were comparable with the construction and auxiliary services sector (56%), but there was a greater level of issues closed out in this sector (20%) although follow-up scores were 8% higher here

Impactt identified the following major non-compliances this year, specific to this sector:

- 4 out of 8 contractors did not have robust processes to ensure that all related costs of recruitment were covered by the employer. Workers reported having paid such fees, which had not been reimbursed by the contractor at the initial audit:
 - Two contractors closed this issue at follow-up, by introducing a new payment procedure for new hires, and reimbursing the existing workers for these costs
 - At the remaining two, workers had not yet been fully reimbursed by the follow-up audit
- 5 out of 8 contractors did not have robust processes for verification of receipts and reimbursement
 - At follow-up, new, robust processes had been introduced at three of these contractors, and they were able to show evidence of repayment to workers who had presented proof
 - The remaining two contractors had taken no action
- 5 out of 8 contractors had not identified whether workers had paid fees at the initial audit
 - Two contractors were able to close this issue at follow-up, by speaking with workers and accurately identifying the levels of fee payment they had made, which were in line with Impactt's interview findings

- Three introduced the new starter checklist, although at two this was found to be filled in by management instead of by workers. The checklists showed that zero fees had been paid despite the workers reporting fee payments to our worker interviewers. At the remaining contractor, the checklists had only been partially completed by workers at the time of follow-up
- At the initial audit, workers at 5 of 8 contractors were not informed during recruitment that they should not pay recruitment fees. At three of these contractors, awareness sessions were effective in informing workers that fee-charging is not permitted and that they could speak to management about any fees which they had paid. One contractor had also included updates to recruitment advertisements with details about recruitment fees, and a notice that they should not be paid. At the remaining two contractors, no effective action had been taken within recruitment processes, and existing workers were still unaware that fees should not have been paid in the first place

Analysis of recruitment fees and related costs

Common findings

The proportion of workers recently recruited by contractors for SC projects who report paying fees and related costs⁵¹ has increased to its highest level since 2018. We spoke to 263 newly recruited workers (who had been recruited since January 2020), of which 207 were in hospitality, and 56 were in construction and auxiliary services. The majority of newly recruited workers still came from India and Nepal, and Indian workers made up 105 of 263 (40%) of our sample of newly recruited workers, and Nepalese workers made up 38 of 263 (14%).

As has been the case each year, Bangladeshi workers continue to report the highest recruitment fees and related costs. Across both sectors, this year's sample of newly recruited workers only included 4 Bangladeshi workers however, due to lack of statistical significance these are included within the 'other' categories of the below figures. These four workers reported an average of USD 1,959 (QAR 7,283) – down from USD 3,136 (QAR 11,393) in our previous annual report.

Across both sectors, Nepalese workers reported a similar rate of fee payments this year, compared with last, at USD 1,107 for hospitality and USD 1,037 for construction and auxiliary services, with little changing from the USD 1,041 reported last year.

216 (82%) reported paying recruitment fees and related costs, up from 68% (2021). This figure of 82% was the same across both hospitality (170 of 263 workers), and construction & auxiliary services (46 of 56 workers).

Across both sectors, we continued to find very low numbers of workers with any proof of fee payment, where such payment was reported. Of these workers, just 29 (13.4%) had any proof of payment, including 27 of 207 (13%) hospitality workers, and 2 of 46 (4%) construction and auxiliary service workers.

⁵¹ 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

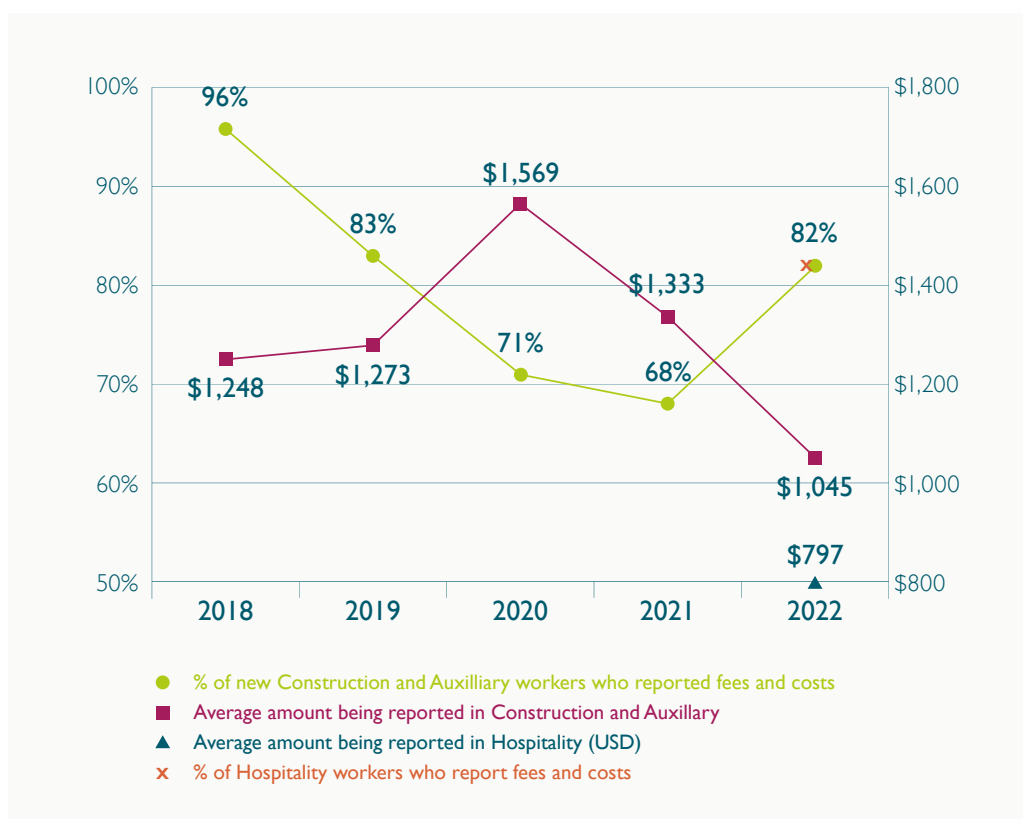


Figure 12 - Recruitment fees and related costs – the overall percentage of workers reporting payment, versus average amount

Construction and auxiliary services findings

Where fees were reported at the eight construction and auxiliary service providers, the average amount that these workers report having paid has decreased 22% from USD 1,333 (QAR 4,843) last year to USD 1,045 (QAR 3,884) this year, as shown in Figure 7. Similar to last year, the continued decrease in amounts reported is due largely to a reduced proportion of Bangladeshi workers within the sample size (5% this year compared with 18% in last year's recruitment fee survey), who tend to pay the highest fees on average⁵².

Figure 13 below 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. As noted in the 'hospitality' findings above, workers from India reported paying higher fees comparatively within this sector. Workers from Pakistan (making up 18% of this sample) also paid particularly high fees, at an average of USD 1,024, with a notable prevalence of 100% of workers reporting at least some fee payment.

It is important to note that three workers from Bangladesh are included in the 'other' category, and these workers reported a much higher average being reported (as noted in 'common findings' above). Selected nationalities have otherwise been displayed where there were at least 10 workers reporting fee payments within a given nationality group.

⁵² Please see p.33 of last year's annual report for details on average fee payments by country.

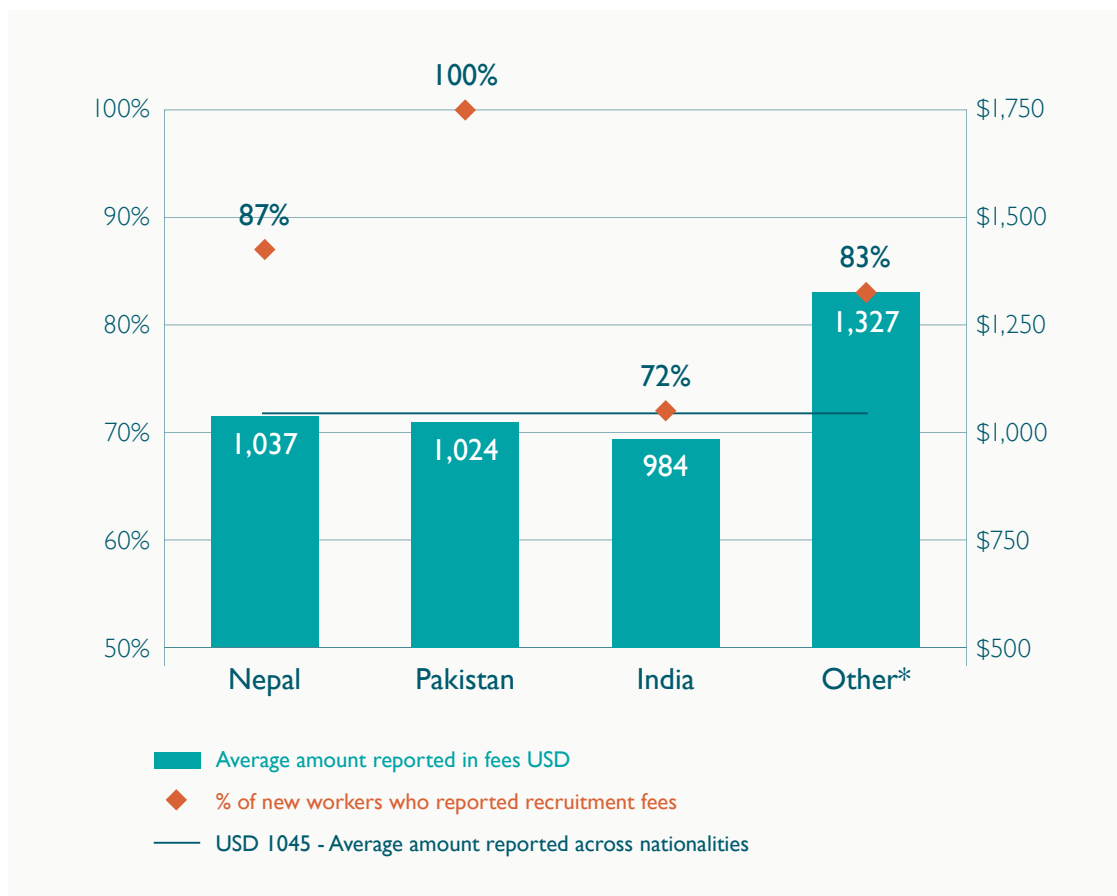


Figure 13 - Construction and auxiliary sector: recruitment fees and related costs reported by nationality, vs percentage reporting paying fees

Prabir⁵³ joined arrived in Qatar in 2017. To obtain this job, he spent QAR 8000 on visas, tickets, and medical, which was paid to a local agent. He is currently earning QAR 800 in his catering role at the SC site. Besides, he does not have any opportunity to work extra hours and earn more. QAR 800 is not enough to pay for the basic needs of his son, his parents, and younger sisters. Additionally, he has a huge loan to pay back the recruitment fees incurred. Although he received a one-time Universal Payment of QAR 1500 for working on the Supreme Committee's project, it is not enough to cover the recruitment fees costs that he paid to come to Qatar.

Hospitality sector findings

The average amount that workers report having paid in the hospitality sector is lower than construction and auxiliary services. Of that 82% of workers who did report fees, the average fees reported was USD797, which is 24% lower than the average figure of USD1,045 reported in construction and auxiliary services this year. Contractors in hospitality tend to utilise direct hiring more often than the construction and auxiliary service sector as well, which can help to reduce middlemen and consequently reduce opportunities for exploitative fee-charging.

⁵³ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

Indian workers made up 80 of 207 (39%) of our hospitality sector sample and reported an average of USD323 in fees. This is significantly lower than the USD984 reported in fees by Indians within the construction and auxiliary services sector:

Two contractors, in particular, noted that they had travelled to workers' home countries for recruitment drives, providing information to workers about exploitative practices to watch out for, and informing them of correct procedures and timelines. These recruitment drives included 70 of the 80 (88%) Indian workers within this sample, demonstrating that these good practices translated directly into lower fees being reported.

Notwithstanding this lower amount being reported, the number of Indians reporting fees is higher in comparison, at 91% compared to the 72% of Indians reporting fees within the construction and auxiliary services.

Additionally, the lower average is in part due to the different nationalities recruited within this sector, who therefore made a bigger proportion of our sample. Workers from Uganda, Ghana and Kenya reported fees at a lower average than workers from Nepal and Bangladesh tend to report, which have made up the majority of our worker interview samples in previous years (see prior annual reports). Selected nationalities have been displayed in the below graph where there were at least 10 workers reporting fee payments within a given nationality group, with the remaining nationalities included in 'Other' (see Appendix 3 for a full breakdown of nationalities within our sample).

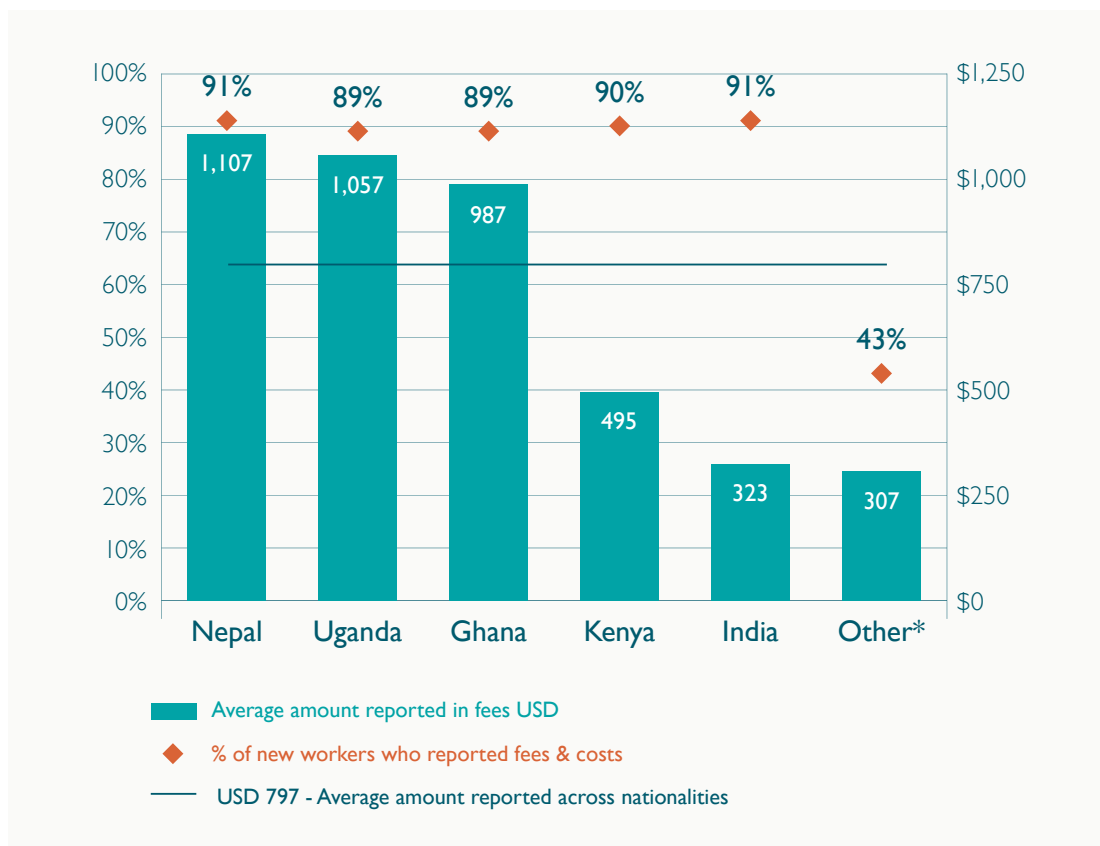


Figure 14 - Hospitality sector: recruitment fees and related costs – the overall percentage of workers reporting payment, versus average amount

Tackling recruitment issues in labour source countries

Continuing last year's trend, no issues remained open regarding the use of unregistered recruitment agencies.⁵⁴ To prevent fees from being paid and in compliance with Qatar Labour Law – the SC requires contractors to use only MoL-approved recruitment agencies and to only use contracts containing ethical recruitment clauses. The SC also requires signed statements from agencies confirming they have adhered to all requirements of the contracts, regarding which no issues remained open at follow-up.

Nevertheless, 82% of newly recruited workers still report paying fees, and WWS requirements surrounding ethical recruitment have not made significant progress in reducing the number of new workers making recruitment fee payments in the first place. This is due to several reasons, regarding (a) improved, yet still comparatively low levels of compliance with the WWS (b) despite some lighter touch due diligence requirements, the WWS does not require contractors to undertake in-depth due diligence of their recruitment agencies (c), the lack of contractor understanding and awareness of what ethical recruitment means in reality, and its importance to the business.

Contractors are not solely at fault, however, as Impactt's experience globally has found that several other key factors within labour source countries also contribute to the ongoing challenges with continued payment of recruitment fees and related costs. Lack of effective laws and procedures within migrant worker origin countries often incentivise the ongoing existence of unregistered agencies, sub-agents, and brokers, which charge exploitative fees to workers, and ongoing failures to change these cultural norms exacerbate the perception by workers that the payment of recruitment fees is normal to guarantee their job.

The SC has the opportunity to expand WWS requirements to encourage enhanced due diligence over recruitment agencies. There is much to be learned from 'best practices' employed by some of the SC's existing contractors, as well as responsible recruitment approaches globally with a greater focus on source country engagement. This may include requirements to provide information on recruitment timelines and expectations to workers, access to hotlines to report any exploitative practices during recruitment, and third party interviews with workers 1 month after their joining date to identify whether they have paid fees and to whom.

⁵⁴ With the exception of hotels – please refer to Appendix I.

Two contractors we spoke to this year reported a very hands-on approach to ethical recruitment, involving travel to recruitment drives in-country, and the provision of information and guidance to workers during their recruitment journey. These contractors had reported that this active approach had resulted in a notable reduction in fee payments during that drive (please see 'compliance findings – hospitality sector' above), though some workers had still been coerced by unlicensed agents into paying some money along the way. An important opportunity exists to support, scale, and replicate practices like this across other contractors, and more widely in Qatar, to continue to drive down fee payments. Now that recruitment has re-opened again in Qatar, next year's report will examine whether workers now being recruited specifically to SC projects, within the hospitality sector, are benefitting from reduced or eliminated payment of recruitment fees and related costs.

The SC has the opportunity to work with the State of Qatar to expand the offering of SCURS more widely across the country, where contractors cannot prove that they have covered all costs of recruitment. Both parties can work together towards the expansion of due diligence requirements recommended here to reduce the risk of future fee payments by migrant workers moving forward.

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)

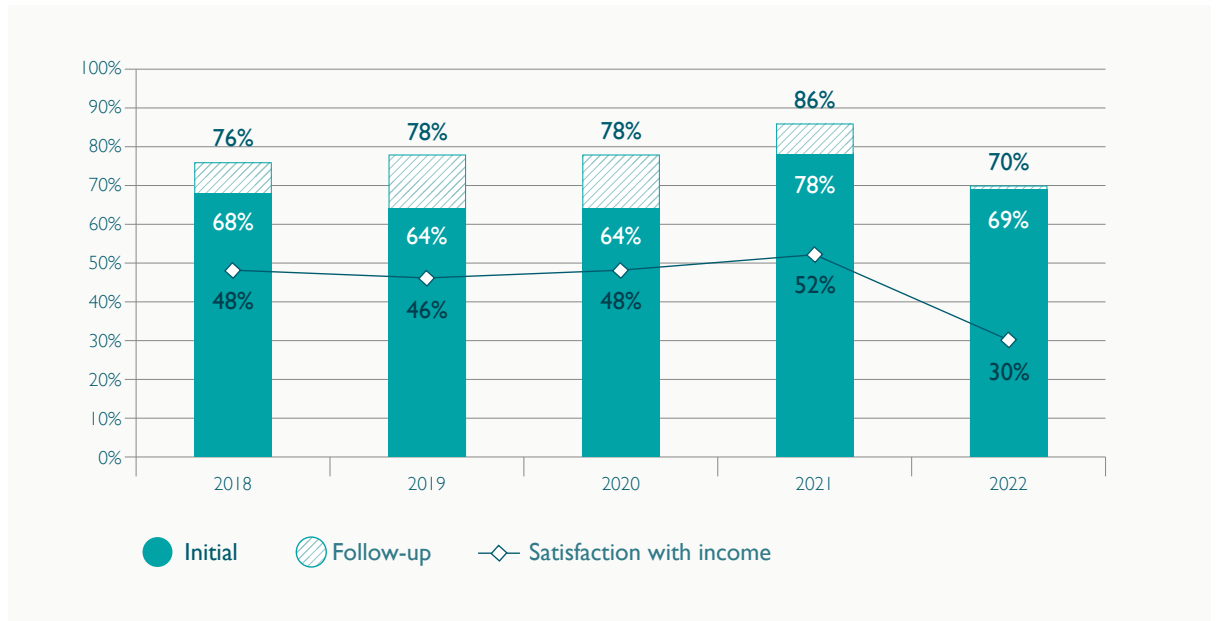


Figure 15 - Wages and allowances: overall compliance vs satisfaction with income

Common findings

Compliance on wages and allowances has decreased since 2021, now at an average of 69% at the initial audit. Compliance at follow-up has decreased by 16% compared to last year, now at 70%.

This year all contractors complied with the new minimum wage laws. As a result of this, SC workers have seen at minimum a 25% increase in their salaries (from a minimum basic wage of QAR 800 (USD 220), up to QAR 1,000 (USD 275). According to Impactt data, the average monthly gross salary observed across all audits this year was QAR 2,063 (USD 567)⁵⁵. Despite this, worker satisfaction with income has decreased by 22% – from 52% of workers satisfied in 2021 to 30% in 2022.

Encouragingly, no ongoing instances of loan deductions greater than 10% of salary were found at the time of the follow-up audit. This is a positive step forward highlighting efforts made and contractors' awareness of the WWS – and not imposing deductions that go against this. An ongoing challenge this year was found regarding seven of sixteen contractors failing to provide annual air tickets to workers as required by the WWS. Last year, all 12 contractors audited were providing workers with this benefit. This is largely because the contractors audited this year have had less time to incorporate and adhere to the WWS as a whole (please refer to the 'context' section) – and are providing workers with air tickets once every two years as per Qatar Labour Law.

⁵⁵ This average includes a subsection of highly skilled workers at one contractor, earning QAR 3,000-6,000 (USD 822-1,644) per month, which therefore raises the overall average.

Construction and auxiliary sector findings

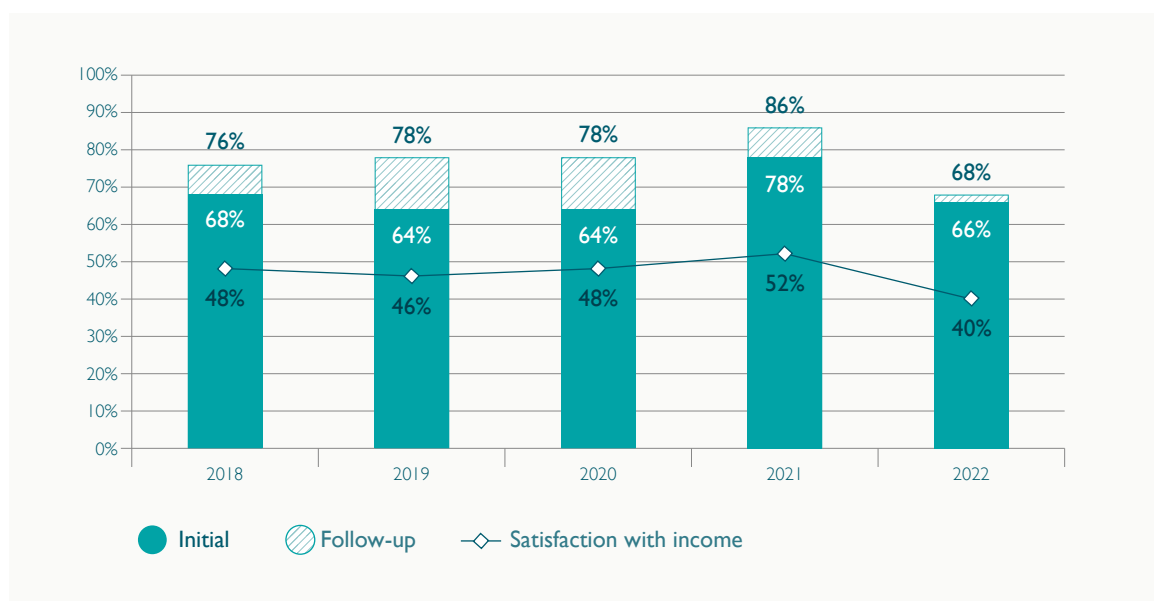


Figure 16 - Construction and auxiliary services - Wages and allowances: overall compliance vs satisfaction with income

The eight contractors in our sample this year who operate in construction or auxiliary services scored an average of 66% at the initial audit. Whilst lower than the initial score averages of the hospitality sector, this group saw a 2% increase on average at follow-up, to 68%. Issues related to lack of payslips, and cash payments, were uniquely prevalent in this sector.

Overall worker satisfaction with income for construction and auxiliary services contractors is higher than the hospitality sector at 40%, compared to 24%. It was nonetheless the lowest observed in the past five years.

Overtime hours not paid in full

Impactt raised three major non-compliances at two contractors which didn't provide workers with all entitlements for work conducted on rest days or holidays.

- Two contractors did not provide workers with compensatory days off or a full day's wage for work done on rest days or holidays. Of these, one contractor circulated a memo stating that workers would be given this time off the next time they take annual leave, however, no worker had taken leave and we were unable to verify this at follow-up. The other took no action, and the issue remains open
- One contractor was paying workers 1.25 times the basic hourly rate for work done on rest days, rather than 1.5 times. At the follow-up audit, no change to this practice was still in place and therefore issue remains open

Delayed wage payment

Impactt raised a major non-compliance related to delayed payment of wages and overtime hours worked.

- Although wages were paid in full, one contractor was paying workers their wages more than 10 days after the payment period in which the work was conducted. For example, wages for August 2021 (payment period from 16th July to 15th August) were paid on 26th August. At follow-up, the issue remained open

Annual airfare not provided

Impactt raised three major non-compliances at three contractors related to the provision of annual airfare.

- At the initial audit, these contractors were found to not provide workers with annual airfare or monthly air ticket allowance that equates to financial provision of annual airfare. Instead, these contractors provide workers with air tickets once every two years. All contractors had not upgraded their policies at follow-up audit and therefore all issues remain open

Payslips

Impactt raised two major non-compliances related to workers' payslips:

- Two contractors were found to not be providing payslips to workers at the initial audit. Neither issue was confirmed to be closed by follow-up, as workers were unavailable for interview at one audit (where the contractor was nearing demobilisation), and management had been unwilling to make changes at the other

Cash payments

Impactt raised three major non-compliance related to cash payments to workers for overtime hours, final settlement benefits and wages:

- One contractor paid workers' salaries in cash. None of these 18 workers (2 workers and 16 technicians) had up to date Qatari Identity Cards (QID) at the initial audit, which management noted was the reason for this cash payment. At the follow-up audit, no change to this practice was observed and therefore the issue remains open
- One contractor paid workers' final settlement packages in cash. At follow-up audit, Impactt was unable to verify any change made to this practice, as no further workers had resigned

Impactt raised a new major non-compliance at follow-up for one contractor who was partially paying workers' overtime in cash payments:

- One worker worked 20 hours of overtime but was only paid for 18 hours through the WPS – the outstanding payment was paid in cash
- One worker worked 28 hours of overtime but was only paid for 26 hours through the WPS – the outstanding was paid in cash
- Two out of 15 workers interviewed reported being partially paid in cash for overtime hours worked

Hospitality sector findings

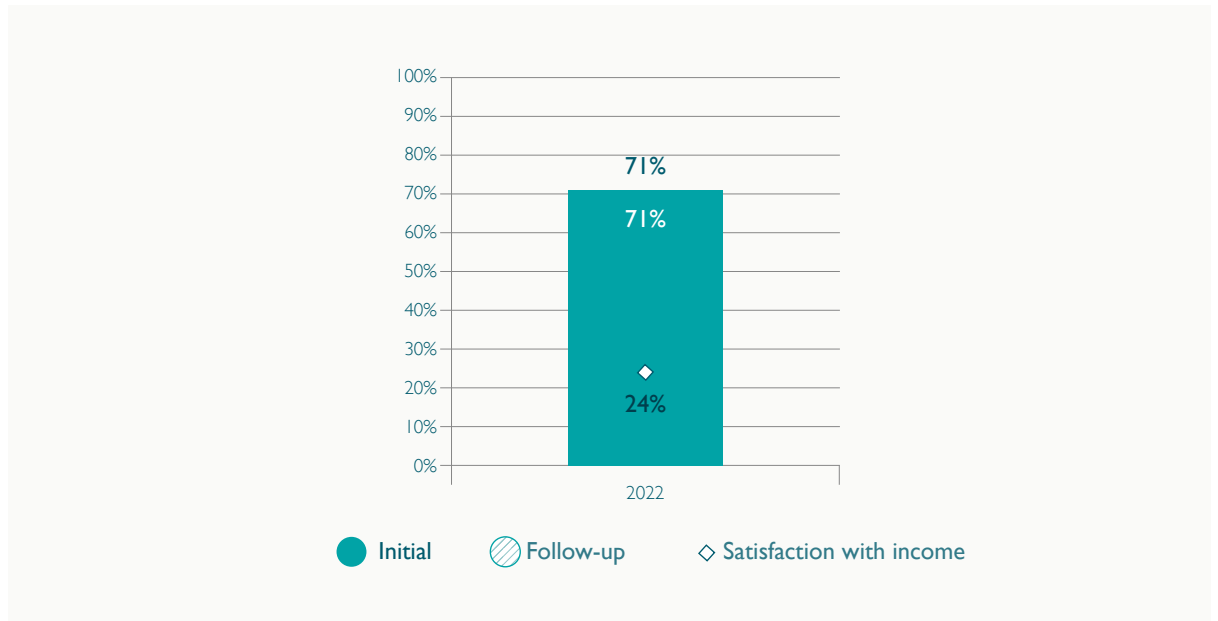


Figure 17 - Hospitality sector - Wages and allowances: overall compliance vs satisfaction with income

The eight contractors in our sample this year which were in the hospitality sector scored an average of 71% at the initial audit. Whilst higher than the initial score averages of the construction and auxiliary services sector, this group saw no average increase at follow-up, remaining at 71%. Issues related to incorrect overtime payments, and annual airfare provision, were more prevalent in the hospitality sector. Worker satisfaction with income for the hospitality sector is lower than the construction and auxiliary services sector, at 24% compared to 40%.

The lower level of satisfaction may be linked to various factors. Hospitality workers – especially those who are customer facing - tend to expect higher wages in general and are accustomed to receiving tips for carrying out specific duties. The COVID-19 pandemic has affected the tourism industry worldwide with fewer guests and events for workers to accumulate informal tips. The implementation of the national minimum wage has also not affected their salary directly – as they were already earning above this on average⁵⁶ - but has had the potential to create the prospect that they might be able to earn more.

Generally, the cost of living in Qatar has also increased⁵⁷. This rising cost of living and inflation value can exacerbate financial hardship felt by workers who previously weren't satisfied with their income.

⁵⁶ Impactt data shows average gross salary in hotel industry in Qatar to be circa QAR 1,600 (USD 438) monthly. This is based on Impactt's sample of workers at audit only, and not representative of the industry as a whole.

⁵⁷ <https://thepeninsulaqatar.com/article/25/01/2022/shura-discusses-inflation-rise-in-cost-of-living>

Francis⁵⁸ travelled from his home country to work for the hospitality industry five years ago. He is the breadwinner of his family, responsible for financially supporting his elderly parents, wife, and young daughter. With an increase in rent in his home country, it has been hard to pay his daughter's school fees.

Moreover, he is not able to cover his family's living costs. He feels unsatisfied with his low wages and his request for a wage increase has been turned down by the employer. He feels very anxious by the thought of not being able to provide for his family's needs.

Overtime hours not paid in full

Impactt has found that timekeeping records and systems maintained by hotel operators are not efficiently capturing overtime hours incurred by workers. Due to the lack of robust systems, it is common for electronic timekeeping systems not to reflect actual overtime hours worked, resulting in unpaid overtime hours. This year we raised major non-compliances related to overtime pay at all three hotel operators.

Impactt raised one critical non-compliance at a hotel operator related to workers not being paid for overtime hours incurred:

- 26 out of 27 workers at the initial audit reported regularly working overtime of 1-2 hours, and 3 workers reported occasionally working between 2-12 hours of overtime without compensation. Impactt observed there to be a 'time off in lieu' system onsite, however, this was informal and not effective. Workers reported that many times their overtime hours were "forgotten" and not included in pay calculations. At a follow-up audit, Impactt confirmed that workers were being paid for overtime at correct rates and in accordance with the WPS. The issue was therefore closed
- A further two hotel operators had major issues as they were found to not be paying workers correctly for overtime hours worked. At one hotel, there was insufficient evidence at the initial audit that overtime was paid to workers in full, as the electronic attendance records used to calculate pay were not reflective of actual overtime hours worked. Impactt observed no change at follow-up as clock-in/out times continued to be much higher than the total paid working time as reported by workers and noted in manual timesheet records, and management reported that if workers worked too slowly and did not complete their regular hours targets, any overtime worked to complete this target would not be paid. This issue remains open. At another hotel, payments made to workers at the initial audit were consistently lower than timesheet hours. Management confirmed that clocked hours are rounded down to the full hour. Document review of payroll and payslips at follow-up audit showed that payments were being made correctly, and the issue was closed

Impactt raised major non-compliances at two contractors which didn't provide workers with all entitlements for work conducted on rest days or holidays:

- One contractor did not provide workers with compensatory days off or a full day's wage for work done on rest days or holidays and did not institute any changes by the follow-up stage. The issue remains open
- One contractor was paying workers 1.25 times the basic hourly rate for work done on rest days, rather than 1.5 times. This issue remained open at follow-up

⁵⁸ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

Delayed wage payment

Impactt raised a major non-compliance related to delayed payment of wages and overtime hours worked.

- Workers at one contractor who work beyond the legally permitted overtime hours, and/or work on public holidays, are paid these hours as 'extra earnings' some months after the work is carried out – through document review Impactt was able to verify four instances of October payments for working hours conducted in July. At follow-up, we were able to verify multiple examples where workers were not paid correctly for overtime hours worked – with one marked example of a worker missing 21 hours of overtime hours worked. Management reported this would be paid in the next round of payroll, and therefore this issue remained open

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

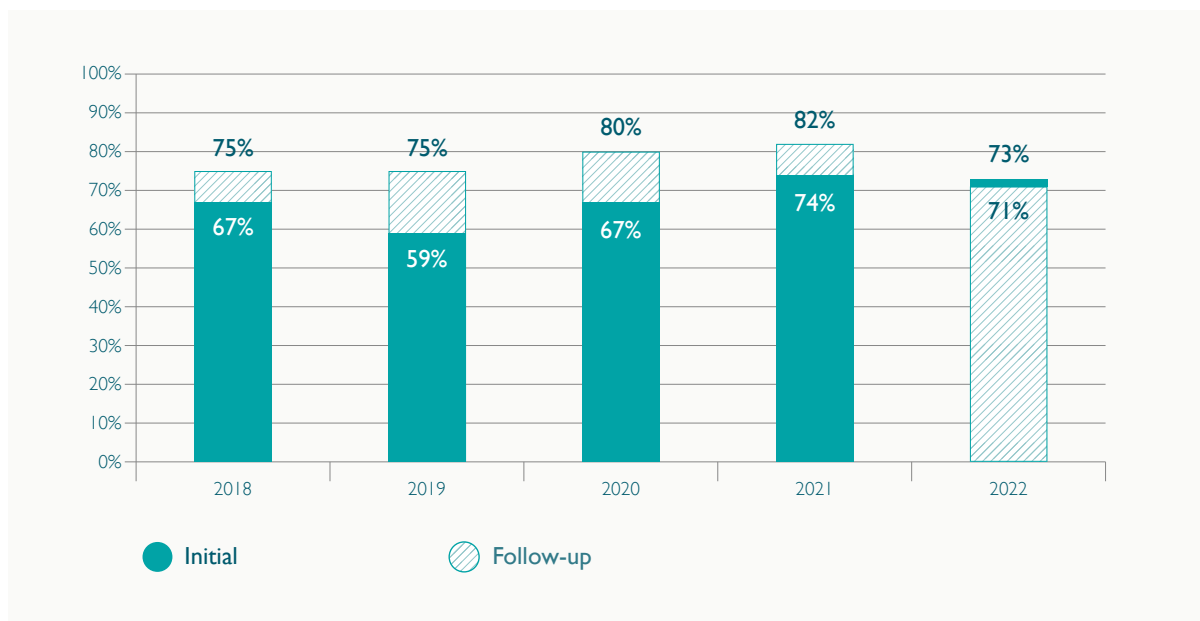


Figure 18 - Working hours, rest and leave - overall compliance

Common findings

Compliance scores at the initial audit for both hospitality as well as construction and auxiliary services have remained similar to 2021, now at 73% (previously 74%). Follow-up scores decreased this year compared to initial audit scores, now at 71%. This is due to a combination of new issues being discovered at follow-up; new areas of our audit checklist becoming applicable only during follow-up, where these had been 'not applicable' at initial; and upgrading in some cases of 'observations' to 'non-compliances at follow-up, for example where observed risks of pending non-compliances at initial audit had not been adequately addressed and had manifested into non-compliances at the time of follow-up.

As borders opened up this year workers were able to take leave and vacation in their home countries. Some contractors provided support for workers' quarantine packages upon their return, either arranging discounted rates or providing salary advances to help cover costs. In semi-structured interviews, workers commonly spoke about their happiness at being able to visit loved ones again.

This year, Impactt audited eight hospitality providers, of which three were hotels. This group of hotels has demonstrated numerous working hours issues, which management noted were due to being short-staffed with a lack of ability to recruit, as well as having outbreaks of COVID-19.

Common issues included overall hours worked per day, the number of consecutive days worked without rest, as well as lack of sufficient break times.

Given the shift in industries audited this year – with a growing emphasis on hospitality – Impactt notes that workers often work indoors in A/C environments (with exceptions below in the Compliance section) where the nature of the work may appear less physical. Importantly, worker testimony confirms many instances of work which is demanding differently – due to intensity of customers' demands, staff shortages and long hours standing, amongst other things. Ensuring adequate break times and rest days is therefore still critical within this sector.

Priya⁵⁹ has a lot of work experience in hospitality, but during the interview, it was proposed that she works in another department. It was promised that the company will transfer her according to her experience when a vacancy was available. It has been two years since, and her role hasn't changed.

She likes the working environment of the workplace and accommodation and working with colleagues of different nationalities. But she is tired from the long-distance travelled (1.5-2 hours daily) between accommodation and workplace, and also of a large number of overtime hours being worked without enough staff. She does not like working overtime as she does not receive any extra pay for this. There is only the benefit of leaving an hour early – but since work is too busy, it is hard to get an opportunity to leave early.

Construction and auxiliary services sector findings

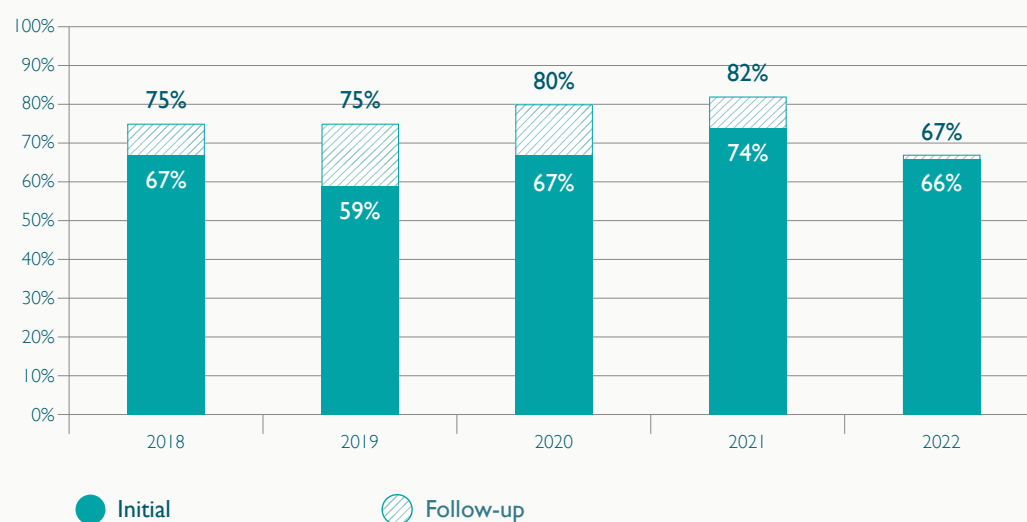


Figure 19 - Construction and Auxiliary Services: Working hours, rest and leave - overall compliance

Average working hours compliance scores for construction and auxiliary service contractors at initial audit sits at 66%, a decrease of 8% from 2021. Compliance scores for follow-up also decreased from 2021, now at 67% for follow-up audit – the lowest score observed at follow-up audit for this topic area in the last five years.

Impactt raised the following critical and two major non-compliances related to excessive working hours:

- Document review of timesheets at initial audit at a manpower contractor confirmed that 15 out of 66 workers worked more than 300 hours in March 2021. At the follow-up audit, similar instances were observed through timesheets that showed 30 out of 61 workers working between 266-280 hours in June 2021. A further 27 workers worked between 240-260 hours in July 2021 – and 1 worker worked 12 hours in one day in July 2021. This issue remains open

⁵⁹ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

- A further two contractors had major issues related to excessive working hours, whereby a small number of workers were working beyond daily limits on multiple occasions. One was able to introduce robust new systems and policies, which worker testimony and documentation confirmed was sufficient to close this issue by follow-up. The other was unable to close these issues, citing staff shortages and outbreaks of COVID-19 as the ongoing reasons for high working hours. The issue remains open

Impactt raised one critical non-compliance at one contractor related to consecutive workdays without rest.

- Document review of timesheets at one contractor showed that 15 out of 66 workers did not receive a rest day after every 13 days worked in March 2021, with four workers working 60 consecutive days across February and March 2021. Despite timesheets reviewed at follow-up showing compliance to the WWS 9.8, multiple workers reported working 30 consecutive days without rest. This issue remains open and highlights a transparency risk

Hospitality sector findings

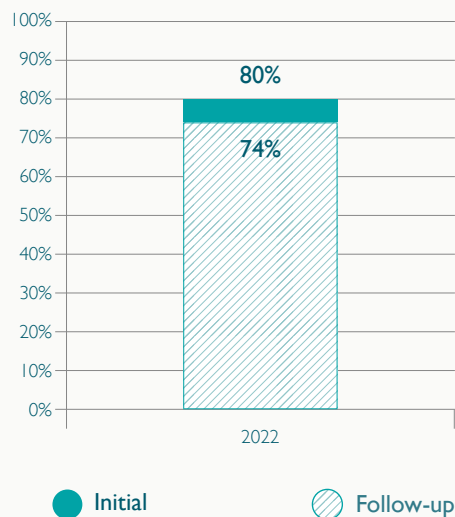


Figure 20 - Hospitality Sector: Working hours, rest and leave - overall compliance

Average working hours compliance scores for hospitality contractors at the initial audit sit at 80% in 2022. Follow-up scores saw an average score of 74%, with a 6% decrease. These scores refer to the eight hospitality providers audited this year:

The decrease in compliance scores is marked by two hospitality providers, who, at initial audit had not commenced on the ground operations – and therefore workers had not started actual working hours as they were all undergoing on the job training. As a result of this, many checks were marked as ‘not applicable’ at initial. At follow-up, we were able to assess compliance against working hours and raised non-compliances that had not been raised during the initial audit. This dragged the overall average compliance scores for follow-up audits down.

Impactt raised two critical non-compliances at two different hotel operators related to outdoor working hours and job duties:

- At 1 hotel operator, all workers interviewed whose workstation is outdoors (at the beach and pool area) reported working full, regular hours during summertime. This was confirmed via a review of timesheets. Workers confirmed that they receive a bonus for doing so, however, site inspection confirmed their workstations were not adequately shaded or cooled, posing a health risk to workers. At follow-up audit, the contractor had delivered training to workers about working in heat and had plans to instil a 'one in, one out' hourly rotation system – however, workers interviewed confirmed this had not yet been implemented and therefore this issue was marked 'progress made'
- Workers at a different hotel operator who are stationed outdoors reported not being able to take a break to cool down, due to the obligations they felt of carrying out their duties. One worker reported regular dizziness due to high heat levels, whilst another worker reported having proposed a cooling technology system to the management team – this worker had not received feedback on this proposal. At the follow-up audit, Impactt learned that training awareness sessions and new policies had been introduced. However, due to the time of year of the follow-up audit (January 2022), we were unable to verify whether these had been implemented or were effective

Impactt raised one critical non-compliance and three major non-compliances related to excessive working hours:

- Document review of timesheets at 1 hospitality contractor found numerous examples of excessive hours worked in May, June and July 2021, with 1 worker found to have worked 13 hours during one day in July. Management interviews at the initial audit confirmed that before August 2021, there were no restrictions on overtime hours worked but that policies had recently been introduced to abolish this practice. Document review at follow-up audit confirmed that no workers worked more than 10 hours per day, and worker testimony corroborated this. The issue was therefore closed
- A further three hotel operators' contractors had major issues related to excessive working hours, whereby a small number of workers were working beyond daily limits on multiple occasions. None of these were able to close these issues, citing staff shortages and outbreaks of COVID-19 as the ongoing reasons for high working hours, and therefore the issues remain open

Impactt raised one critical non-compliance and one major non-compliance related to consecutive workdays without rest or inadequate break times given to workers. Both contractors were hospitality service providers:

- Document review of timesheets at 1 contractor identified three instances of workers working more than 13 consecutive days in a row. New policies were implemented by the contractor regarding rest days, and manual timesheets at follow-up audit found that no workers had worked more than 13 consecutive days, and therefore this issue was closed
- Workers at another contractor were not receiving 1-hour breaks and were also observed to be working more than 5 consecutive hours. At follow-up, we verified that workers were being given appropriate break time and workers were not undergoing more than 5 consecutive hours. This issue was closed

D. Treatment

WW Standards requirements

The WW Standards require contractors to:

- Treat all job applicants equally and fairly in providing access to employment, training and opportunities for promotion irrespective of their age, nationality, disability, ethnic or national origin, gender, race, religion or belief or marital status (WWS 6.2)
- Select, employ, promote, and treat individuals based on their relevant aptitudes, skills, capabilities, and qualifications (WWS 6.2)

Have in place written policies and procedures to:

- Prohibit forced labour, use of violence, bullying, harassment, victimisation, threats, or intimidation against workers
- Prohibit the exploitation of workers' vulnerability, including the
- Threat of denunciation to the authorities as a means of coercion
- Take disciplinary action against employees who are found to breach the prohibitions prescribed under WWS 9.1
- Workers are free to travel to their home countries during leave without penalty

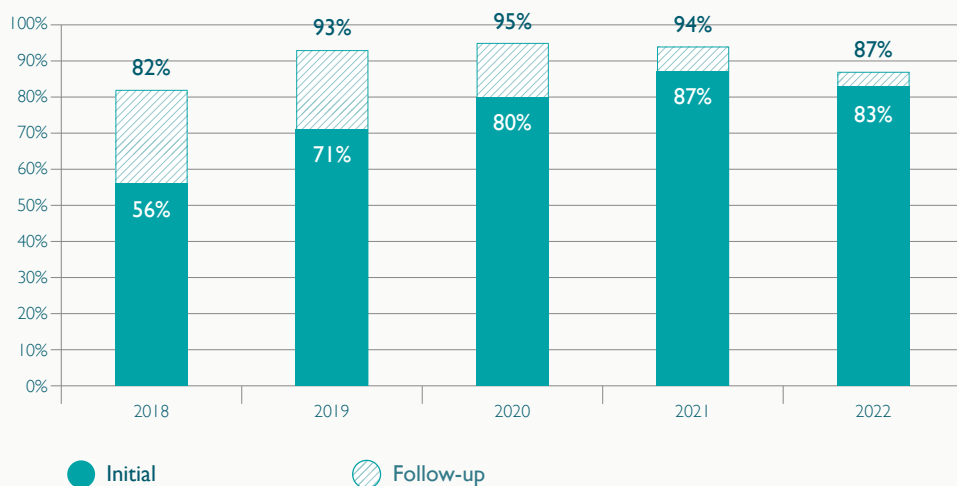


Figure 21 - Treatment - overall compliance

Common findings

Despite compliance scores having remained steadily high in the last four years – now at 83% average compliance at initial audit and 87% average at follow-up – this year there was a 7% decrease in overall compliance scores at follow-up audit.

As set out in the 'Context' section, this year our worker samples were comprised of a higher proportion of women than our past worker samples. In addition to this, workers were from a wider range of nationalities. Despite high compliance in this section – this year and historically – this year has seen instances of discrimination, based on both nationality and gender.

Construction and auxiliary services sector findings

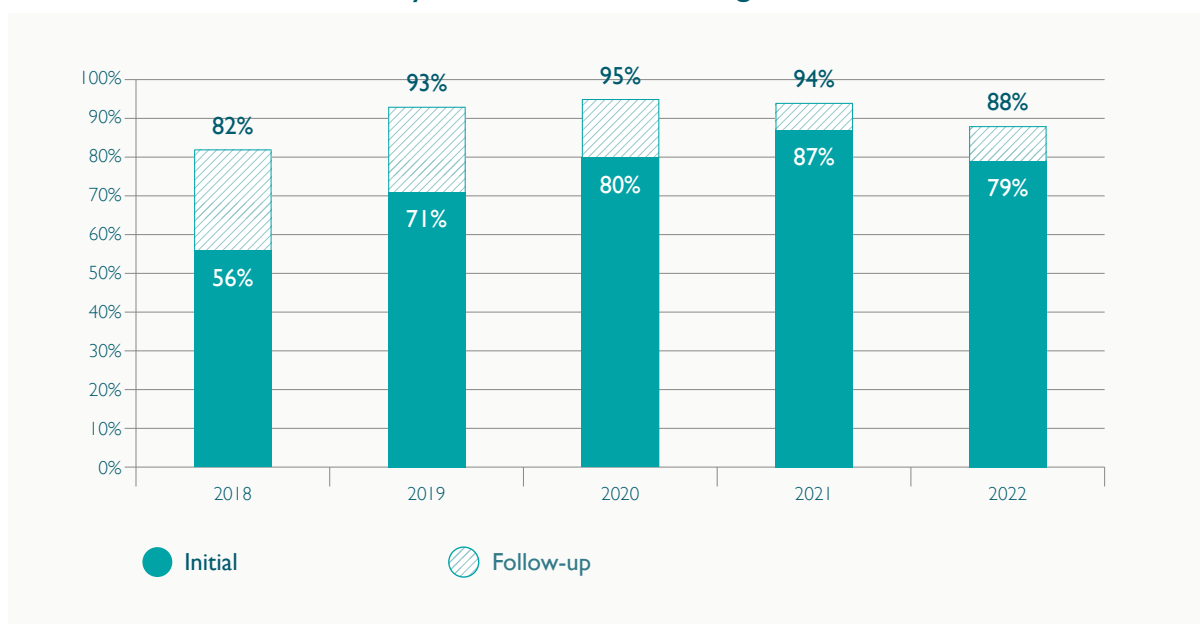


Figure 22 - Construction and auxiliary sector: Treatment - overall compliance

The eight construction and auxiliary services contractors in our sample this year scored an average of 79% at the initial audit. Whilst lower than the initial score averages of the hospitality sector, this group saw a 9% increase on average at follow-up, to 88%.

Impactt raised one critical observation at a contractor related to workers experiencing unfair treatment or favouritism.

- At one contractor, 5 out of 16 workers interviewed reported that they are shouted at by supervisors and technicians if they are late for work or make any mistakes whilst working. Workers further reported being victims of verbal use and derogatory slang language – they reported never raising this with management as they felt it was part of workplace culture. At the follow-up audit, Impactt observed that management had identified one supervisor responsible for this behaviour and issued a warning letter to him. Management also drafted a policy on anti-bullying and anti-harassment and communicated this to workers. However, 7 out of 16 workers still reported being shouted at by their supervisor at follow-up, meaning that despite the new policies and procedures, implementation was not yet effective so the issue could not be closed.

Hospitality sector findings

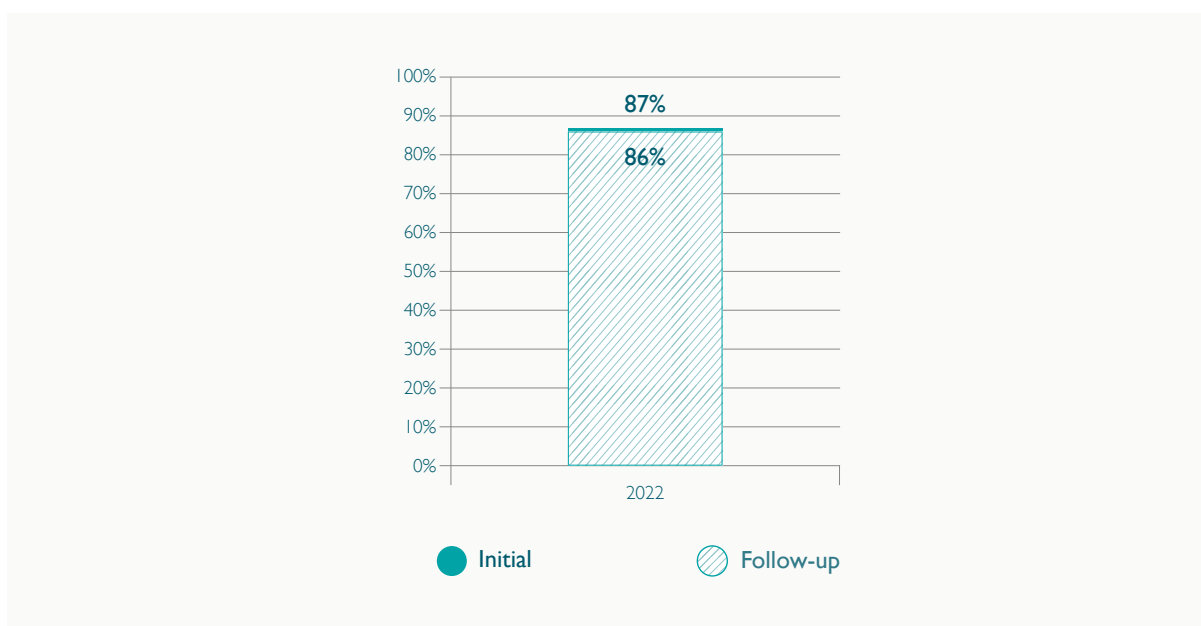


Figure 23 - Hospitality Sector: Treatment - overall compliance

The eight contractors in our sample this year within the hospitality sector scored an average of 87% at the initial audit. This decreased to 86% on average at follow-up, due to the finding of more new issues, than the closure of existing issues at this stage.

Hospitality sector compliance findings

Impactt raised one new major non-compliance related to discrimination based on payment relative to the job role. This was raised at a hotel operator:

- Management, documentation, and workers confirmed that workers undertaking the same job role and responsibilities receive different pay, based on nationality. In particular, Brazilian, and Russian workers were paid more than double compared to workers from Asian countries for the same job. This issue remains open

Impactt raised critical observations at two hospitality contractors related to workers experiencing unfair treatment or favouritism.

- 19 out of 27 workers interviewed at one contractor reported that supervisors and management favour workers of their nationality, particularly regarding promotion and the allocation of specific tasks. Monthly training was then provided to supervisors on how to prevent favouritism, and all concerned workers reported a noticeable improvement, marking this issue as closed at follow-up
- Several workers at a different contractor reported that African workers were individually assigned to a cleaning block while Asian workers were assigned in pairs – thereby sharing work responsibilities. Workers reported that management had justified this to them by saying that African workers were stronger and could handle the extra work. This issue remains open

Impactt raised a total of three issues (one critical observation and two major non-compliances) related to gender discrimination, which were spread across two hotel operators:

- One contractor was found to have placed a curfew on the women's accommodation only, whereby women would have to be present in the accommodation between 1 am and 5 am unless they were married. Management reported that this practice was common across female accommodation in the area. This represented both a freedom of movement issue and an issue of gender discrimination. The contractor repealed this rule by the time of the follow-up audit via memos and policy change, and this was understood by the workers, resulting in the closure of this issue
- Female workers at another contractor reported that sexual harassment by customers was common and that they felt this was due to the style of uniforms they were required to wear. They reported that they did not feel that raising grievances regarding this would lead to any tangible results, as attempts to do so in the past had failed. This issue remained open
- Female workers interviewed at another contractor confirmed the requirement to wear heels had led to bruising of their feet and back pain. The contractor reported its intention to pilot the rollout of high quality, comfortable footwear to workers which is paid for by the management and aims to ensure this will not cause aches and pains. This had not yet been implemented, and the issue remained open

E. End of service procedures

WW Standards requirements

The WW Standards require contractors to:

- The Contractor's policies and procedures shall stipulate that a Worker shall be entitled to terminate their Employment Contract without notice and retain full rights to both the End of Service Gratuity and repatriation at the expense of the Contractor where the Contractor:
 - Commits a breach of its obligations under the Employment Contract or at Law; or the Contractor's representatives
 - Commit a physical or immoral act upon such Worker; or
 - Have misrepresented to the Worker at the time of entering into the Original Offer of Employment and/or the Employment Contract as to the terms and conditions of the work; or
 - Are aware of a danger to the health, safety or security of the Worker and do not take the necessary steps to remove the relevant danger
- The Contractor shall, upon the end of the employment of a Worker, pay for the repatriation travel expenses of that Worker in accordance with the Law or their Employment Contract, whichever is more favourable to the Worker
- All Wages and End of Service Gratuity payable to Workers at the end of their employment shall be paid to the relevant Worker before their return to their country of origin or as soon as reasonably practicable if the Worker remains in Qatar
- In the case of death of a Worker, all Wages and End of Service Gratuity due shall be promptly settled and transferred to the Worker's family wherever they reside

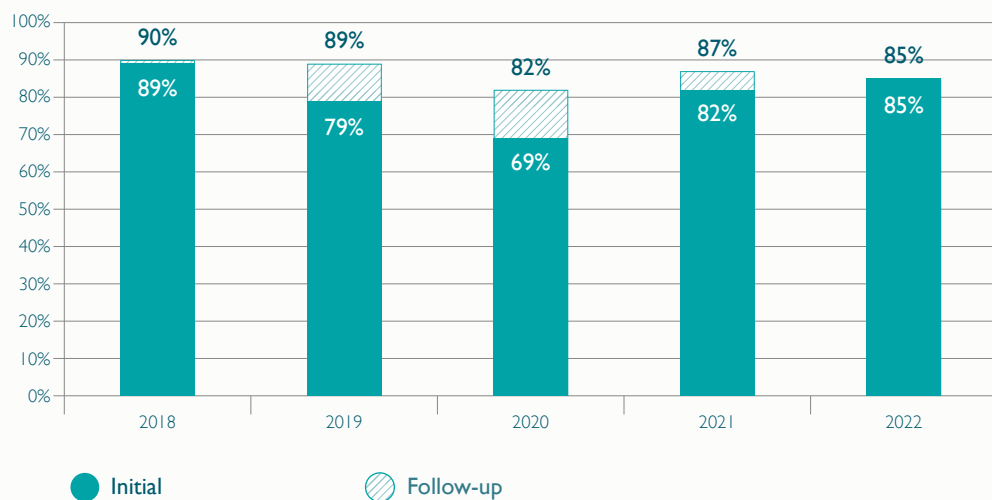


Figure 24 - End of Service - overall compliance

Compliance scores for end of service procedures have remained high and are now at 85% at the initial audit. Average compliance scores at follow-up remained unchanged, as contractors were unable to show significant progress overall.

Despite high levels of compliance, we have highlighted this section as a risk area based on the high severity of some of the non-compliances raised. This includes instances observed of barriers to workers resigning from their jobs (please see the 'worker satisfaction section' for further details). This includes some cases of a de facto continuation of the 'No-objection certificate' as well as beliefs by workers that their end-of-service benefits would not be paid, preventing them from resigning due to financial ties.

The most severe issues were raised at construction and auxiliary service contractors.

Yasin⁶⁰ feels unable to resign from his job. He does not believe his employer would provide him with a permission letter for changing to another employer if he searched for new work. Going home is not an option, as this would mean he is no longer able to provide for his family, and he could not even afford to pay for the air-ticket home.

Construction and auxiliary services sector findings

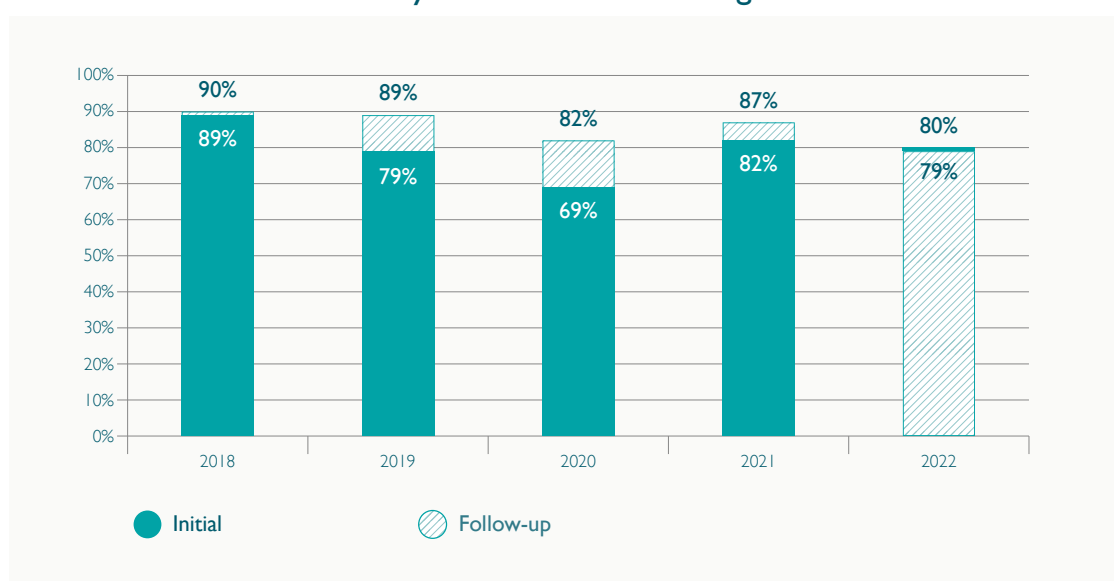


Figure 25 - Construction and auxiliary services sector: End of Service - overall compliance

Average compliance scores for the initial audit was at 80%, a 2% decrease from 2021. Compliance at follow-up for this year dropped to 79%. The 1% decrease can be explained by one construction company. At follow-up, this company had a significant decrease in compliance score, largely due to a new major non-compliance raised related to end of service gratuity payment.

⁶⁰ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

Impactt raised two critical non-compliances at two contractors, related to end of service gratuity not being paid or workers' perceived barrier to resigning from their job:

- One contractor was not paying end-of-service gratuity or outstanding annual leave payment to its workers. Furthermore, the explanation of the end of service gratuity calculation was not clear or standardised. In some cases, Impactt verified that workers were receiving some form of end of service gratuity and outstanding annual leave payment – but calculations appeared to show that workers were only being paid for half of what they were entitled to. The workers noted this as a perceived financial barrier to resignation, believing they would only be paid half of their benefit. At the follow-up audit, no change was observed to this practice. The issue remains open
- One contractor was deducting the remaining value of the visa cost from workers' end of service gratuity when they resign before the end of their contract. 19 out of 19 workers perceived this as a barrier to resignation and believed that they must work their entire contract length before being able to resign. At follow-up audit, despite policy changes by management, Impactt observed that this perceived financial barrier to resignation still exists as all 15 workers interviewed reported still believing that they would need to pay the remaining value of visa cost. The issue remains open

Impactt raised one critical observation related to workers' perceived barriers to resignation and taking annual leave:

- 32 out of 32 workers reported that they think cannot resign from their job because they believe they will not be entitled to receive an end of service benefit if they do. In addition, all interviewed workers believe they can only take annual leave after working in the company for 18 months, rather than 1 year as stipulated by law. This restricted workers' rights to freely leave the company. At the follow-up audit, we verified that the contractor has provided awareness sessions to workers covering the end of service benefits – 200 workers had participated by then. However, 16 out of 16 interviewed workers reported that they cannot resign from their job because they think they will not be entitled to end of service benefits, and this issue could therefore not be marked as closed despite the awareness sessions and despite Impactt not having verified evidence that corroborates worker testimony

Impactt raised issues related to NOCs⁶¹ still presenting a barrier to resignation at three contractors. These were raised based on worker satisfaction data and not through compliance issues raised:

- Impactt found that workers at three contractors felt that the need to obtain a NOC presented a barrier to resignation, despite the dismantling of this requirement in 2020. At two contractors, policies were updated, and awareness sessions were held, and follow-up confirmed understanding from all workers that they did not need to seek this permission anymore. The barriers were deemed to be no longer present, with both issues closed

⁶¹ Please see 'Context' section for a description of the No-objection certificate (NOC) regarding the former law which was abolished in 2020.

Hospitality sector findings

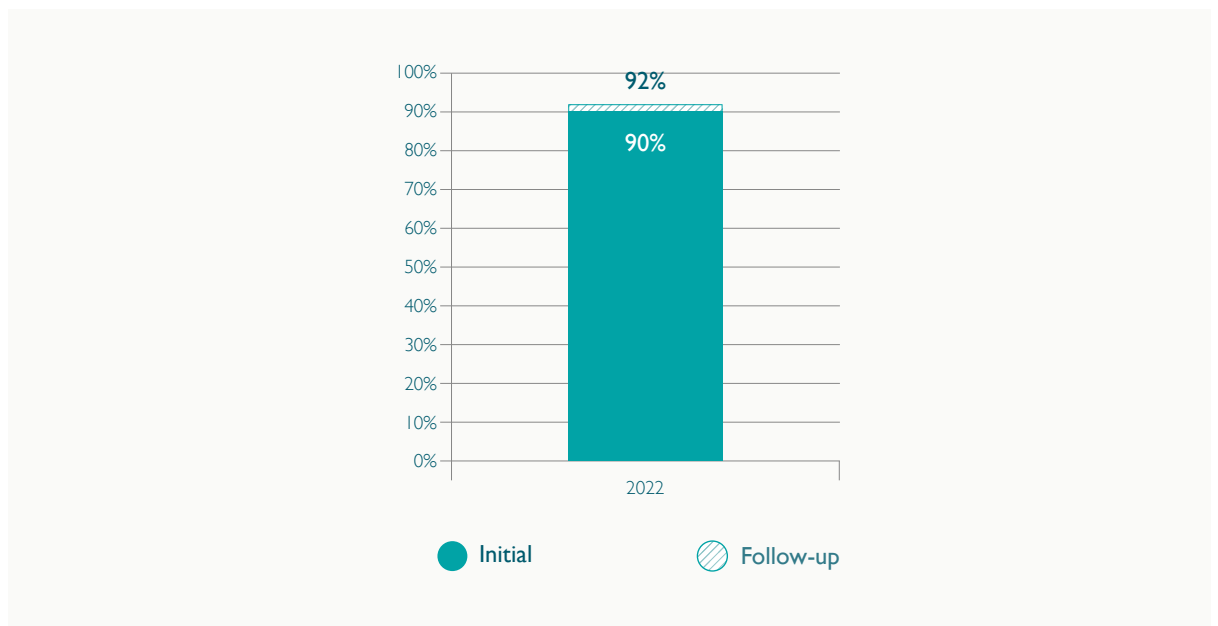


Figure 26 - Hospitality sector: End of Service - overall compliance

Average working hours compliance scores for hospitality contractors at initial audit sit at 90% in 2022. Follow-up scores saw an average score of 92%, with a 2% increase.

Impactt raised one critical observation related to workers' perceived barriers to resignation and taking annual leave:

- At one contractor, 8 workers reported instances of being “blacklisted” by management and prevented from transferring jobs to another hospitality provider in Doha when they resigned. This issue was closed at follow-up audit as 18 out of 18 workers confirmed this to not be the case, with two workers having recently witnessed colleagues transferring jobs

Impactt raised one critical observation related to one hotel operators' recruitment process:

- Impactt found that one hotel – when recruiting locally in Doha – requires applicants to provide a NOC issued by their current employer, and also provides these to their workers when they want to resign. This was seen as a barrier to resignation by a worker who reported feeling that it would be difficult to resign due to the need to receive a NOC. This issue remains open as no change was made (please see 'context' section for further details)

The SC's Summary of Progress against the Roadmap

The tables below provide an overview of 2021 activities - as reported by the SC - arranged by the roadmap pillar. This is the second year of this roadmap.

Pillar I – Ensuring legacy	
Impactt recommendations	Progress reported by the SC
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.	<p>SC WWD focused on:</p> <ul style="list-style-type: none"> • Hospitality industry collaboration groups, facilitated by ILO and MoL • Collaboration with key stakeholders to ensure that the SC WWS requirements are included in their tendering process (Aspire, Katara Hospitality, MATAR etc.) • Guiding and monitoring complete lifecycle of workers' welfare management (e.g., Mowasalat, Accor etc.) • Facilitation in arranging Hospitality working groups workshops throughout the year to improve welfare practices
Continue the cooperation with MoL to establish proven best practices of the WWS and its implementation across SC projects in Qatar.	<p>As part of capacity building programmes and to relay the legacy baton to MOL and ILO, SC further cemented collaboration with:</p> <ul style="list-style-type: none"> • Periodic leadership meetings • Brainstorm challenges and remediation in preparation for the event • Sharing list of non-compliant companies for further punitive action • MoL resources seconded to the SC WWD and are part of the Compliance and Audits team • Facilitation of additional visas for highly compliant contractors through MOL • Proposing to induct more personnel from MOL for training and development
Continue to update and disseminate the whitelist of approved subcontractors and include further details on good practices, especially within ethical recruitment.	<p>SC WWD continues to:</p> <ul style="list-style-type: none"> • Share the list with TDO, HCO, Hospitality, Hotels on regular basis; and • Facilitate additional visas for highly compliant contractors • Share ILO study on good practices with recruitment agencies. The SC encourages contractors to follow these practices to ensure ethical recruitment <p>The SC is encouraging highly complaint Main Contractors to engage Stakeholder forum, wherein management of the SC WWD, Main Contractors and OCPs can brainstorm challenges, inquire for additional clarification, share best practices and remediation of current non-compliances.</p>

Pillar 2 – Reinforcing Ethical Recruitment	
Impactt recommendations	Progress reported by the SC
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.	<p>The SC has mandated all contractors engaged with SC to ensure implementation of due diligence mechanisms in supply chain management, to be followed by HCO and Hospitality contractors, that detail out:</p> <ul style="list-style-type: none"> • Capacity building at Main Contractors levels for welfare management • Adherence to ethical recruitment guidelines by ensuring that MoL registered agencies are engaged – including ethical recruitment clauses in contracts with agencies – or in case of exception in certain countries, at least use SC WWS in finalisation of the contract with agencies from home countries • Template to be used when finalisation of recruitment agencies contract with MoL registered agencies or home country based sub-agencies • Engage with highly compliant sub- contractors and recruitment agencies • Involvement of Welfare/ HR teams of contractors in supply chain management • Requirement of SMETA and SC WWS in supply chain management
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.	
Support main contractors to champion the rollout of improved policies and procedures at their subcontractors, using their own experience.	
Provide tangible support for contractors to build the capacity of their staff and the agencies with which they contract so that they understand and can implement ethical recruitment policies.	
Introduce incentives and/or penalties for main contractors to drive compliance with recruitment requirements.	
Consult civil society organisations and NGOs to gain intelligence concerning issues relating to recruitment in labour source countries, especially relating to corruption and kickbacks, to improve ethical recruitment outcomes.	The SC has continued its engagement with Impactt, BWI, MoL and other reputed NGOs to identify and remediate ethical recruitment challenges.
Consult and collaborate with MoL where national measures are required to address common challenges in ethical recruitment.	The SC will assess mechanisms of further enforcement of measures at Qatar Visa Centre (QVC) in collaboration with MoL.

Pillar 3 - Providing sustainable solutions to recurring problems	
Impactt recommendations	Progress reported by the SC
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:	The SC has developed a multi-level training approach, based on the need-to-know basis, from worker up to Executive management level that includes workers' rights, grievance mechanisms, ethical recruitment process, good practices, etc.
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.	
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 highlight high-risk areas.	<p>All HCO and Hospitality projects have been mandated to have:</p> <ul style="list-style-type: none"> • A dedicated/nominated WWO • Workers Welfare Forums-departmental and nationality level or combined • Awareness on SC hotline • SC's training programmes from workers to Executive management level
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.	<p>Out of 21 hotels under the SC's audits and inspection regime, WWFs have been formed in nine hotels, while four are in process of formation.</p> <p>ILO and MoL have attended WWF meetings at five hotels. To promote the existing WWF platforms more efficiently and effectively, ILO and BWI have started to conduct additional training programs for Worker Welfare Representatives (WWRs) of the Hospitality & HCO. ILO and MoL has trained WWRs of four hotels and two more hotels will be covered by February 2022.</p>
Engage with relevant government bodies to explore national measures to implement sustainable solutions for recurring problems at scale.	The SC will continue its engagement with major stakeholders including Aspire, Qatar Foundation, Katara Hospitality etc.

Conclusion and Roadmap recommendations for 2022

The SC has continued to improve on compliance results year-on-year, despite ongoing challenges of contracting companies in new sectors, and working in the wake of the COVID-19 pandemic. This is an important accomplishment given the imminence of the Tournament, and the need to contract with a greater number of hospitality providers.

Overall, issues per contractor increased slightly this year by 5%. Nevertheless, the overall severity of non-compliances raised has decreased, with a reduction in both critical and major non-compliances per contractor. The decrease in worker satisfaction by 16% from 4.3/5 to 3.7/5 is notable and partly relates to reduced satisfaction with income in the new sectors in our sample, despite higher earnings on average.

The SC is well poised to deliver a long-lasting legacy of the continued adoption of its WWS, by supporting its contractors and the State of Qatar to expand these into law and common practice. Beyond the WWS, SCURS has continued to expand across Qatar, with over 266 contractors now committed to paying QAR 103.95 million (equivalent to USD 28.4 million) to 31,220 SC and 18,066 non-SC workers. The commitment to pay to non-SC workers is an important aspect of the legacy that the SC can hope to achieve, through promoting this scheme (and indeed, its WWS) more widely across the country and region.

The widespread adoption of SCURS in Qatar has helped to repay at least some of the historic unethical fees paid by workers. The scheme, whilst ground-breaking, could benefit from an updated methodology, as payments are made over a long period, do not reflect the differences in fees paid by nationality, and do not include inflation or interest on the payments made⁶². The ILO is currently considering the adoption of recommendations along such lines. Both the State of Qatar and international entities abroad hosting similar events should consider this expanded approach to the repayment of recruitment fees and related costs, in addition to the measures towards prevention of payment noted in 'Pillar 2' below.

Key challenges still remain also in reinforcing ethical recruitment to ensure that recruitment fees and related costs are prevented in labour source countries. Please see below for our further recommendations under the three-pillar roadmap (introduced in our 2020 report). As the Tournament draws near, we have broadened the scope of these recommendations beyond the timeline of the FIFA World Cup 2022, to ensure the legacy of SC's valuable work.

⁶² See the following guidance written by Impactt, which benefitted from consultation with 200+ public, private and international stakeholders, on repayment of recruitment fees: <https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/>. This guidance is currently under discussion at the ILO.

Pillar 1 – Ensuring legacy

Focus SC efforts to:

1. Engage with stakeholders and peers within the market, particularly with those under WWS requirements, to share learnings, understand good practices and implement these moving forward
2. Continue to engage with other organising committees of international sporting or cultural events or major projects to share detailed learnings
3. Where recruitment fees are discovered within the hospitality sector, use the SC's influence to ensure that contractors implement an appropriate repayment scheme
4. Focus on good practices developed by contractors and communicate these to MoL for wider adoption

Support the State of Qatar to:

1. Adopt a strengthened approach to monitoring, grievance management, compliance, and enforcement, learning from the SC's comprehensive due diligence programme and multi- tiered approach
2. Increase enforcement mechanisms across multiple sectors to drive compliance with QLL, intervention for critical issues such as delayed wage payment
3. Consider better regulation of the hospitality and services sector, particularly about working hours and overtime payment
4. Increase standards of accommodation across Qatar to meet those of the SC WWS
5. Incorporate annual air-ticket allowances into QLL, in line with the SC WWS

Pillar 2 – Reinforcing ethical recruitment

Focus SC efforts to:

1. Continue to enforce and expand upon the ethical recruitment provision of the WWS to ensure in-depth ethical recruitment due diligence, to reduce and ultimately prevent the payment of recruitment fees. The SC can build on the successful cases of some 'good practice' contractors (detailed in the 'ethical recruitment' section) and ensure that workers have access to awareness sessions in origin countries, and a confidential hotline to report any issues of unethical recruitment during their recruitment journey. This can help reduce deception and intimidation of workers during their recruitment journey, prevent financial exploitation and reduce the financial burden of fee repayment on the contractor
2. Where recruitment fees are discovered within the hospitality sector, use the SC's influence to ensure that contractors implement an appropriate repayment scheme

Support the State of Qatar to:

1. Expand due diligence requirements over international recruitment as recommended in the bullet point above, to reduce the risk of future fee payments by migrant workers moving forwards. This should include dialogue with sending countries to aid in implementing preventative measures to avoid fees being paid in the first place

2. Where, despite these best efforts, workers report paying fees, adopt the SC's Recruitment Reimbursement Scheme, which has been widely successful and resulted in a commitment of QAR 103.95 million (equivalent to USD 28.4 million), across all sectors in Qatar. We recommend making a legal requirement on the employer to repay recruitment fees according to international best practice⁶³, building upon and expanding on this successful innovation

Pillar 3 - Providing sustainable solutions to recurring problems

Focus SC efforts to:

1. Continue to increase efforts in training, awareness building, and dialogue sessions to promote a cultural shift across the key areas mentioned within this report. Such areas have flared up this year with the increased diversity of gender and nationality within the hospitality sector. Moving forward, and as the SC focus more on the hospitality sector, the challenges, and complexities of the gender scope – and all that this entails – will be ever more at the forefront of the workers' welfare auditing scope. In particular, take time to help contractors understand the reasons and benefits for effective worker dialogue mechanisms, including the importance of grievance logs, resolution, and remedy (including effective enforcement of hotline complaints received), and increasing worker awareness of representatives and their roles

Support contractors to:

1. Gather data to understand the business impacts of better compliance and higher worker satisfaction, in terms of productivity and efficiency
2. Train middle-management staff on the purpose and benefits of the WWS, moving beyond compliance

Support the State of Qatar to:

1. Build the capacity of its ministry to implement, monitor and regulate good labour practices across all sectors. In particular, focusing on increasing their ability to communicate the importance and requirement of the law. To increase knowledge base and cohesion within government, to replicate and scale key achievements in workers' welfare

Support FIFA and other sports governing bodies to:

1. Apply and build on the SC's comprehensive workers' welfare and labour rights model with Local Organising Committees and other host nations

⁶³ <https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/>

Appendix 1 – Topic area descriptions

Topic area	Requirements
Due diligence	<ul style="list-style-type: none"> • Contractor is subject to SC audits and inspections • Contractor conducts self-audits every quarter • Contractor conducts ad hoc audits of their sub-contractors • Contractor ensures that their subcontractors undertake quarterly self- audits • Contractor submits the required information to the SC every month • Contractor cooperates with the External Monitor's audits <p>Adapted methodology for the hospitality sector: it will be at the discretion of Impactt's Lead Auditor to determine if contractors have effective due diligence in place, which serves a similar (or better) purpose to what has been expected of prior contractors, regarding ad hoc audits.</p> <p>The Lead Auditor should observe through document review and management interviews whether or not contractors are proactive in mitigating and managing any risks to workers' welfare that might arise through subcontracting services to other lower-tier contractors.</p>
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 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 <p>Adapted methodology for the hospitality sector: Impactt's Lead Auditor has discretion, whereby if the above points are broadly covered by international policies observed and verified at multinational hospitality providers, and serve a similar or higher standard, these should be compliant. The policies are not required to be 100% verbatim of WWS 6.2 and 9.1.</p>
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 • Recruitment agencies are MoL attested <p>Adapted methodology for the hospitality sector: when recruitment is happening from the South Asia region or Africa and a recruitment agency used by the contractor is found to not be MoL registered, this will be raised as a non-compliance, in accordance with agency registration requirements of the State of Qatar. If the recruitment is happening from other locations this is marked as N/A.</p>

Topic area	Requirements
Contracts and administration	<ul style="list-style-type: none"> • 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 that they understand, and the workers sign the offer of employment without coercion • Workers receive an MoL-attested employment contract that 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 <p>Adapted methodology for the hospitality sector: the offer of employment given to workers does not have to follow WWS 7.1 line by line. However, workers must be given a copy of the offer of employment in their mother tongue, and this must contain all key terms relating to their role, location, pay, hours etc. (at the auditor's discretion) that match those of their employment.</p>
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
Personal documents	<ul style="list-style-type: none"> • Contractor ensures that workers have a valid residence permit, Qatari ID, and health card • Workers have their 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 by the Wage Protection System • Deductions from wages are made by 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 <p>Adapted methodology for the hospitality sector: regarding the provision of annual airfare, this is not a blanket requirement for all higher-skilled and higher-paid roles. However, this WWS (9.7) should be provided for workers earning minimum wage or close to minimum wage per month. If annual airfare is not in place for these workers, we raised it as non-compliance.</p>

Topic area	Requirements
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 MoL 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 <p>Adapted methodology for the hospitality sector: various structural requirements in this section (related to wall mounted shoe racks, the provision of outside shaded areas, extractor fans built into accommodation hallways, amongst other requirements) are now marked as N/A due to the housing of workers in villas and apartments. These requirements are deemed to fall outside contractors' ability to remediate, as usually these are enforced by the accommodation provider's building facilities management team. Please see the 'context' section for commentary on the quality of villas provided.</p>
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 <p>Adapted methodology for the hospitality sector: the requirement for a PWWO and WWO to be appointed can be marked as N/A only if it is observed (through worker interviews) that workers already have a designated person to go to for raising issues if workers are fully aware of who this person is and how the process works, and if the process is deemed equally or more effective than compliant systems in existing contractors. Appointment by workers (rather than elected) is acceptable, depending on the total number of workers on site.</p>
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

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 practices 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.

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, 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 a 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 visits 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 are 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 on the findings. A representative from the SC and the PWWO 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.

Appendix 3 – Methodology

Scope of Impactt's work

Before beginning its compliance monitoring work in 2016, Impactt developed a bespoke auditing methodology to assess contractors' compliance with the WWS and relevant Qatar Labour Law⁶⁴. 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 tiers⁶⁵. Impactt selected a sample of workers for an interview, ensuring a cross-section of nationalities, job types and lengths of service⁶⁶, 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 15 out of 16 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 one transparency issue raised. This was document-related disclosure of workers on site. 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 were included in the sample.

⁶⁴ 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.

⁶⁵ 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.

⁶⁶ To gain a relevant and timely insight into current recruitment procedures workers who were recruited within the year are overrepresented.

Sites	2022			2021			2020			2019			2018			Overall		
	MC	TI	T2	MC	TI	T2	MC	TI	T2	MC	TI	T2	MC	TI	T2	MC	TI	T2
Al Bayt Stadium	1	1					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						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	1							2	1		2	1	1	2	1	1	6	3
Khalifa Stadium													1	2		1	2	0
Lusail Stadium	1	2			3			3	2		3	2	1	1		1	10	4
Training sites	1						1			1						2	0	0
SC Nursery													1			1	0	0
Ras Abu Aboud Stadium	1	1		1		1		1			1				2	1	2	3
Production Workshops ⁶⁷								1			1					0	2	0
Other*	6																	
Total	12	4	0	3	4	5	7	15	6	7	16	6	11	10	4	28	45	21

Table 4 - Coverage of SC project sites⁶⁸

*Other includes a mix of hotels and call-off contractors at the Aspire Zone.

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.

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

⁶⁷ Impactt audited the off-site production facilities of one supplier to the SC sites that rolled out the WW Standard to all his operations.

⁶⁸ 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).

Sample 2022				
		Sample	SC scope ⁶⁹	% covered
Interviews conducted ⁷⁰		528	13,574	4%
# of workers' nationalities		25	72	35%
Contractors audited (initial and follow-up)	Main	12	163	10%
	Tiers 1-3	4	147	2%

Table 5- Impactt sample

The nationalities of workers interviewed are shown in the figure below (Figure 13). Impactt interviewed workers of 25 nationalities present at SC projects. As noted in the 'context' section, this represented an all-time high in terms of diversity in nationality selection. 63% of all workers interviewed were nationals of India, Bangladesh and Nepal, the most common countries of origin for workers at SC projects.

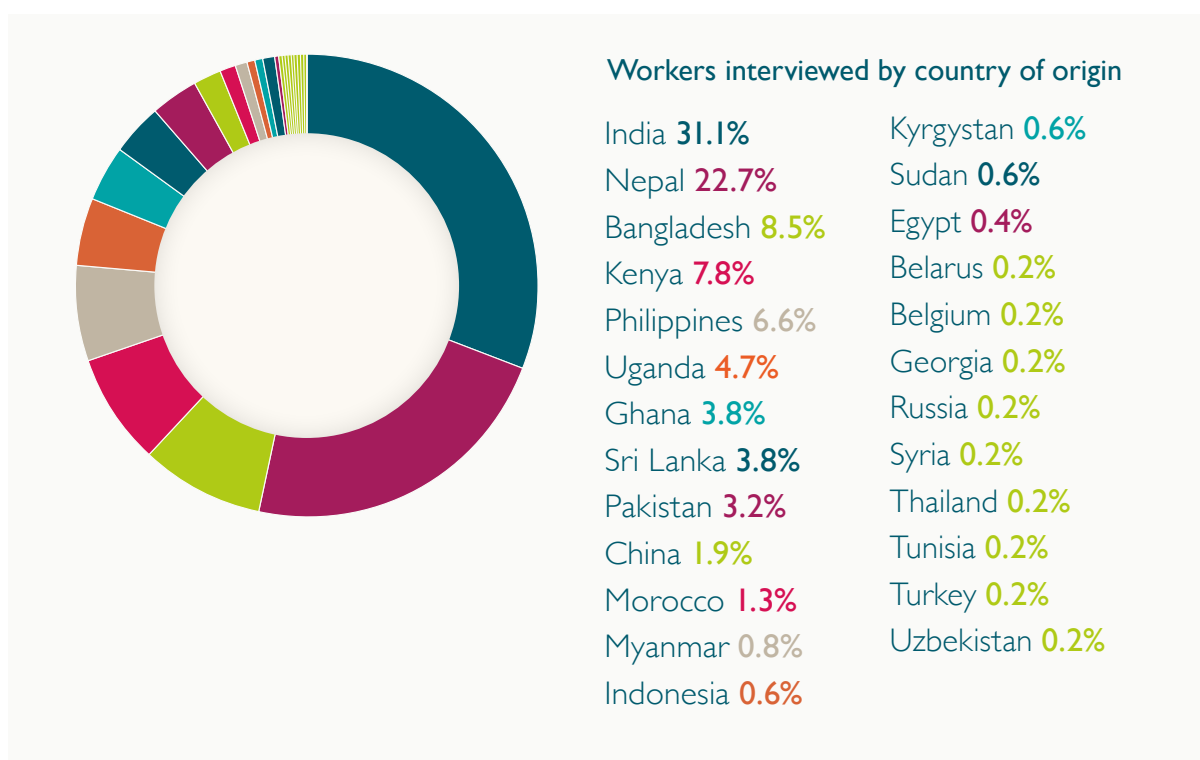


Figure 27 - Workers interviewed by country of origin

⁶⁹ Data provided by the SC, as of February 2022.

⁷⁰ Worker satisfaction presented in this report draws on data from initial audits only, unless progress between initial and follow-up audit is specifically analysed. 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 over 10,000 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, and a wide variety of other languages when needed.

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 the lowest skill job roles. Samples cover all shifts, key nationalities, genders, job roles and a variety 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 interview 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. 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
<p>Semi-structured interview</p> <p>The core of each worker interview progresses along the “worker journey” (from recruitment right through to the end of service). Impactt invites workers to share their workplace experiences about 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 6 - Interview methods and outputs



MAKING WHAT'S
GOOD FOR WORKERS
WORK FOR BUSINESS