



اللجنة العليا  
للمشاريع والريث  
Supreme Committee  
for Delivery & Legacy

Date: 17 August 2020

Ref. No.: [REDACTED]

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**Human Rights Watch**  
[REDACTED]

**Subject: Response to letter relating to wage abuses of migrant workers in Qatar**

We refer to your letter dated 22 July 2020, summarising Human Rights Watch's (HRW) findings and questions relating to your organisation's research into employers' wage abuses in Qatar.

All workers under the purview of the Supreme Committee for Delivery & Legacy (SC) are covered under the SC's Workers' Welfare Standards (WW Standards) and enforced by the Workers' Welfare Department (WWD), to ensure adherence to specific requirements for ethical recruitment, salaries and benefits and accommodation. In addition to construction workers, the scope of our programme also covers workers involved with security services, facility management, housekeeping/clinics, transport, food and beverage, among others. Through our robust Compliance and Audits mechanism, we continuously monitor companies' compliances with the requirements of the SC WW Standards and Qatar Labour Law and have enforcement measures in place to rectify any non-compliance.

#### **Protection of wages**

We continuously monitor payment of wages on our programme. When incidences of non-compliance are identified, we implement the enforcement measures made available to us through our WW Standards. We have always maintained a spirit of transparency. For example, we reference our [5th Annual Progress Report](#), in which we highlight the issue of delayed wages as a challenge we are working to overcome.

Through our forensic auditing process and the grievance mechanisms we have made available to workers, we quickly identify cases of salary delay issues. In each case, we undertook rectification options available to us, including:

1. **Reporting to the Ministry of Administrative Development Labour and Social Affairs (MoADLSA)** – the SC has reported non-compliant contractors to MoADLSA. In the majority of instances, MoADLSA has taken punitive action that included issuance of warnings to defaulting contractors, placing an administrative block on their activities and in isolated, egregious cases, arrest of contractors' owners.
2. **Payment suspension and direct payment to workers by main contractor** – based on the SC's direct instruction, some main contractors made direct payments to affected workers from the defaulting sub-contractors. In the case of one contractor, this arrangement continued for at least six months, until the sub-contractor's financial situation improved.



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3. **Watchlisting/blacklisting** – when non-compliance persisted, we placed offending contractors on our watch-list / blacklist prohibiting their mobilisation on any SC site until there was evidence of satisfactory rectification.

Our external monitor, [Impactt Ltd.](#) - a leading ethical trade consultancy firm - plays a vital role in our four-tier auditing system. As part of their quarterly audits, Impactt examines the salary disbursement records, conducts socio-economic surveys with workers, and reports any cases of non-compliance along with their root causes. The SC promptly follows up with our main contractors and their respective sub-contractors to resolve any issues Impactt reports, undertaking the rectification measures available to us outlined above. By their next quarterly audit, Impactt follows-up to ensure satisfactory closure of any non-compliances. As with our Annual Progress Report, to maintain transparency, Impactt annually releases an independent public report outlining the challenges it identified during that reporting period, including delays in salary payments. Impactt's reports, along with all the SC Annual Progress Reports, are published online at [\[https://www.qatar2022.qa/en/opportunities/workers-welfare/news-reports\]](https://www.qatar2022.qa/en/opportunities/workers-welfare/news-reports).

During the COVID-19 pandemic, the SC has implemented wide-ranging policies to ensure the welfare of our workers (<https://www.qatar2022.qa/en/about/faq#COVID-19>). The SC mandated that all workers on its programme are routinely provided with their salaries, food, transportation and accommodation in accordance with the guidelines released at the onset of the pandemic, by MoADLSA. This includes payments to workers in isolation and quarantine. High-risk workers identified by the SC (workers with pre-existing chronic conditions and those aged above 55) were promptly relocated to a separate accommodation to ensure their health and well-being. In addition, they were temporarily suspended from work, yet they continued to receive their salaries, benefits and accommodation. The SC constantly engages with all our contractors and deals with matters on a case-by-case basis when issues arise directly related to salary payment.

#### **Pre-mobilisation and recruitment**

Since January 2017, the SC has implemented a workers' welfare pre-mobilisation approval process to ensure that contractors, before they enter our sites, comply with Qatar Labour Law and the WW Standards. When shortcomings are identified, contractors are required to provide evidence of rectification prior to being on-boarded. Approval is withheld to contractors who have defaulted on WW Standard's requirements or are on our 'watch-list', until they have rectified their respective issues and provided comprehensive commitments to adhere to the WW Standards.

Concerning recruitment practices, the WW Standards are clear on the process to be followed for every contractor engaged on an SC project. SC contractors are only permitted to use recruitment agencies registered with MoADLSA. The contract between the recruitment agent and contractor must include mandatory clauses that include free recruitment and mobilisation of workers; contractors' responsibility to bear the full cost of recruitment; no retention of workers' personal documentation; and the strict prohibition of using unlicensed brokers/sub-agents.

The SC has also implemented a Universal Reimbursement Scheme to ensure recruitment fees are reimbursed by contractors to employees. The SC has collaborated with over 230 contractors to date to reimburse approximately 47,900 workers (only 29,300 of which are SC workers), with over \$31 million committed to be



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reimbursed over the following three years. In addition, 180 contractors have “formalised” their commitment by attesting it with MoADLSA. This ensures that reimbursements continue post-demobilisation.

### **Workers’ voice**

The WW Standards require that every contractor with 50 or more workers establish Workers' Welfare Forums (WWF) for each of their accommodation sites. WWFs provide a safe environment to raise a wide range of issues which include salary delays, accommodation, food, transport and health and safety concerns. Workers democratically elect their representatives, and collectively address their grievances to Workers’ Welfare Officers (WFO) through their representatives on a monthly basis. We have found WWF to be very effective in identifying worker grievances. The Building and Wood Workers’ International (BWI) attends WWF meetings during their Joint Working Group visits and engage with Workers’ Representatives to enhance awareness on the role of WWF, WFO and the SC grievance hotline. They have attested to the transformational nature of these forums and their effectiveness in amplifying workers’ voices.

A key component of our workers’ welfare programme is ensuring the legacy that will define Qatar’s FIFA World Cup in 2022. We work closely with MoADLSA and other partners in Qatar to continuously transfer knowledge and best practices. One clear indication of this legacy, is the announcement in April 2019 by the International Labour Organization (ILO) and MoADLSA of their intention to expand the WWF system country-wide - they will be implementing this mechanism across Qatar providing workers with Joint Committees where they can collectively raise their grievances.

We trust the information enclosed gives you the answers required and will be adequately contextualised in your report. If you seek further clarification on any of the points raised within please do not hesitate to get in touch.

### **Supreme Committee for Delivery & Legacy**