



Business & Human Rights
Resource Centre

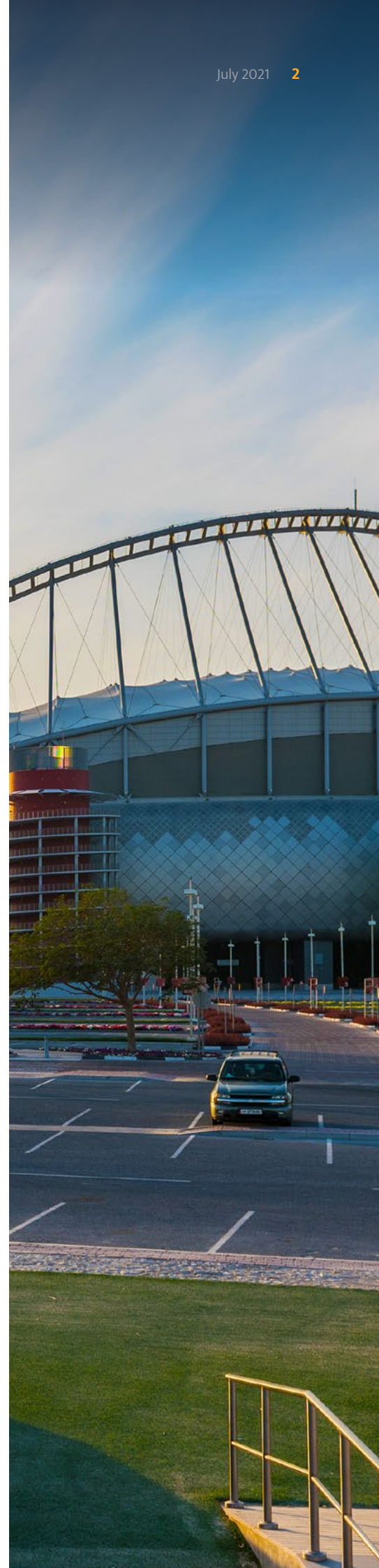
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MIGRANT WORKER ABUSE IN QATAR'S
WORLD CUP LUXURY HOTELS

JULY 2021

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Executive summary

As kick-off to the FIFA World Cup Qatar 2022 draws closer many national football teams have taken [recent stands](#) against racial injustice to highlight the plight of migrant workers in Qatar. As far back as 2019, [Liverpool Football Club refused FIFA's offer to stay in the Masa Malaz Kempinski](#) during the Club World Cup after a Guardian investigation alleged forced labour among subcontracted workers.

Football's increasing consciousness of human rights issues will be tested once again when the teams arrive in Qatar. To manage the expected influx of players, supporters and the media, the Gulf state has seen exponential growth of the hotel industry, with an additional [26,000 hotel rooms](#) brought on stream in time for the World Cup. Yet our research shows hotel brands have failed to take necessary action to protect migrant workers, who suffer serious abuses including: extortionate recruitment fees, discrimination and being trapped in a job through fear of reprisal and intimidation. These occurred despite "landmark" labour reforms which promised to end the [Kafala](#) system.

The Business & Human Rights Resource Centre (the Resource Centre) invited 19 hotel companies, representing more than 100 global brands with over 80 properties across Qatar, to participate in a second survey on their approach to safeguarding migrant workers' rights in the country.¹ We were pleased to see increased engagement from the industry this time, with 11 out of 19 (58%) responses, compared with seven out of 17 (41%) responses to the previous survey. However, it is disappointing that several high-profile brands, including **Best Western, Four Seasons** and **Millennium & Copthorne**, failed to respond. Our survey revealed a widespread lack of action by hotel brands to prevent and exclude forced labour. This reinforced the stream of stories from workers about abuse taking place in hotels, but the survey also highlighted a cluster of companies who have shown greater leadership. **IHG Hotels & Resorts**, which was not one of the leaders identified in our previous report, had significantly improved aspects of its approach and was the highest ranked company this time.

¹ This follows our [first survey](#) of brands operating in Qatar and the UAE in 2018 which found that while many brands had human rights commitments in place the majority could not demonstrate how they implemented those commitments nor how they upheld human rights standards throughout their business relationships.



A central pillar of our research involved engaging with partners to interview workers at hotels we approached. This testimony revealed a shocking contrast between hotels' public policy commitments and their practical application or enforcement. This was particularly evident in recruitment processes, where eight out of 18 workers reported being charged high fees for jobs despite the fact that only **IHG** provided transparent figures for the number of workers it identified had paid such fees. The interviews also revealed discrimination in position and pay based on nationality and far worse treatment of subcontracted workers.² Most alarmingly, almost all workers reported being scared to request to change jobs when they saw a better opportunity, with some fearful the hotels would report them to the authorities and subsequently have them deported. Much of this points to conditions of 'forced labour' as defined by the International Labour Organization (ILO). Unfortunately, the responses by brands revealed none conducted worker-centric monitoring³ of the conditions of subcontracted workers despite this vulnerable group often working long-term for the hotel brand.

Our findings should make for troubling reading for the national football teams and one million visitors who are planning a joyful month of sport in Qatar in November 2022, but not at the expense of workers' misery. It should also be a red flag for corporate sponsors of the World Cup. Huge profits are set to be made by the multinational and national hotel brands which will host these visitors. Meanwhile, migrant workers from East Africa, South Asia and South-East Asia, who make up the vast majority of the workforce in the hospitality sector and will be integral to the success of one of the greatest sporting spectacles in the world, will not be able to relish the moment. Instead, they are likely to be left dealing with debts and discrimination, trapped in jobs through intimidation and threats. The eyes of the world are currently on Qatar; teams, fans, media and corporate sponsors will all need to book hotels for their stay, providing a rare opportunity to push for lasting change from a sector which lags behind many others in its protection of migrant workers.

² Reference to "subcontracted" workers in this report encompasses workers employed by someone other than the brand or hotel property owner, for example, an outsourced cleaning or security company contracted to provide workers to the hotel, either long-term or short-term during periods of high demand.

³ As stressed by the [Worker-Driven Social Responsibility Network](#), for human rights monitoring systems to be effective, workers and worker organisations should be given a formal and central role in creating, monitoring and enforcing programmes to improve working conditions from the "bottom-up" within supply chains.



How do hotel companies rate on tackling abuse?

HOTEL BRANDS STAR RATING⁴

★★★★★ 70–85 points	No brands	
★★★★☆ 53–69 points	No brands	
★★★☆☆ 35–52 points	IHG Hotels & Resorts	40.5
★★★☆☆ 17–34 points	Hilton Hotels & Resorts	32.5
	Marriott International	31
	Kempinski Hotels	28.5
	Radisson Hotels	25
	Accor	23
	Minor International	21.5
	Whitbread	17.5
	★★☆☆☆ 0–16 points	Hyatt
Louvre Hotels		11

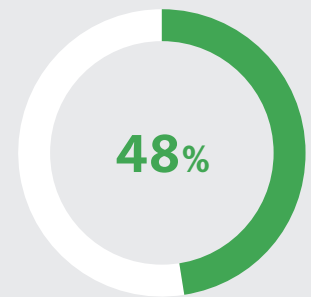


Non-responders

These brands had very little publicly available information regarding their human and labour rights standards. As the survey questions are specific to their workforce and operations in Qatar, we were unable to score them meaningfully.

- Best Western International
- Four Seasons Hotels & Resorts
- Frasers Hospitality
- Katara Hospitality
- Millennium & Copthorne Hotels
- Retaj Hotels & Hospitality
- Rotana Hotel Management
- Wyndham Hotels & Resorts

11/19 brands answered the questions in our survey



IHG scored the highest and was the only brand to be awarded a three-star rating (out of five)



Louvre scored the lowest with 11 points out of 85 (13%)

 All brands scored below 50%

⁴ Deutsche Hospitality's single property in Qatar opened in May 2021, therefore we have excepted them from the tier as a number of survey questions were not applicable.

Key findings

- ➔ Engagement has increased: 11 of 19 brands (58%) participated in this survey compared with seven out of 17 (41%) last time.
- ➔ **IHG** scored the highest and was the only brand to be awarded a three-star rating (out of five). **Louvre** scored the lowest with 11 points (13%), but all brands scored below 50%.
- ➔ Transparency lagged behind other sectors: only four of 19 brands disclosed names of their labour suppliers and recruiters.
- ➔ Workers were not able to freely change jobs despite the landmark reform abolishing the No-Objection Certificate (Kafala system): Almost all workers revealed at least some issues with changing jobs, ranging from not being allowed to break their contract to fear of intimidation and reprisal, including deportation, if they requested transfer.
- ➔ Recruitment remained one of the most serious areas of risk with due diligence processes not fit for purpose:
 - ➔ Only **Hilton** described conducting active due diligence to select recruitment agencies in sending countries that went beyond reviewing legal documentation;
 - ➔ Eight of 18 workers interviewed said they had paid recruitment fees;
 - ➔ Only **Radisson** and **Kempinski** had a policy fully compliant with the Employer Pays Principle;
 - ➔ Only **Hilton** and **IHG** stated they had uncovered instances of worker-paid recruitment fees, but only **IHG** disclosed how many cases of recruitment fees it had uncovered;
 - ➔ Eight brands either did not provide any data or said they had not detected any instances, whilst failing to outline robust mechanisms to safeguard against fee charging.
- ➔ Worker voice is severely suppressed: The majority of responding brands stated they had worker committees or an equivalent mechanism for worker organising in the absence of legally permitted unions. However, workers at the hotels replied universally that no such committees exist.

11/19 hotel brands participated in this survey



4/19 hotel brands disclosed names of their labour suppliers and recruiters



6/11 responding brands provided some information on the number of workers they made redundant due to COVID-19



8/18 workers said they had paid recruitment fees



10/18 workers from Africa or South Asia reported pay and position were dependent on nationality



- ➔ Subcontracted workers had far less favourable terms and conditions, received substantially less pay for the same work and were subject to the most serious abuses, including passport confiscation and delayed wages with illegal deductions.
- ➔ Despite well-known risks in the subcontracted workforce, no brand demonstrated satisfactory due diligence of labour suppliers:
 - ➔ Most brands did not disclose any due diligence steps to monitor the treatment of subcontracted workers and several brands referred to carrying out audits or “reserving the right” to do so despite the well-known failure of audits to detect serious abuse in supply chains;
 - ➔ No brand reported proactively and systematically speaking to subcontracted workers to assess standards despite these workers being present in their hotels.
- ➔ Ten out of 18 workers interviewed from Africa or Asia reported pay and position were dependent on nationality.
- ➔ Most responding brands (six) provided some information on the number of workers they made redundant due to COVID-19, and all outlined steps they took in worker accommodation and at work to safeguard workers against the virus.

These deeply troubling findings illustrate the wide gulf between hotel brands' policies and the worrying experience of workers who lack even the basic freedom to change jobs. Brands must urgently overhaul their approach and ensure the protection of migrant workers by:

- ➔ Putting all **workers at the centre of their due diligence** monitoring processes, including regularly interviewing subcontracted workers about their conditions; consulting with civil society in the region as well as in key sending countries; and establishing meaningful democratic worker committees which include subcontractors and allow workers to bring issues to management without fear of reprisal;
- ➔ Ensuring **workers are free to change jobs** without fear of reprisal by training all workers and subcontractors on their rights under the labour reforms that abolish the No-Objection Certificate (NOC); training all hotel management to ensure they understand their responsibilities to accommodate transfer requests and not impose additional administrative requirements (e.g. resignation letter);
- ➔ **Addressing recruitment fees** by working collaboratively as an industry with key stakeholders in sending countries to establish a fair and transparent recruitment process that ensures workers will not pay fees; systematically carry out interviews with workers at several points in the recruitment process to establish if fees have been paid and requiring subcontractors to do the same; and ensuring fees are repaid to workers and subcontracted workers, if necessary reimbursing subcontracted workers directly.

Please see our full [recommendations](#) at the end of the report.



Qatar context and hotel business model

At the time of writing, Qatar has [132 operational hotels](#); the majority are run through management business models under agreements between local property owners and the largest luxury hotel brands in the world. A total of [108 hotels were in the pipeline](#), at various stages of development. This is set to increase the number of rooms from [32,000 to 58,000 rooms by kickoff in 2022](#). Statistics from Qatar's Planning and Statistics Authority revealed that only 50 Qataris were employed in hotels as of 2019. The number of migrant workers in the hotel sector, mainly from [Bangladesh, India, Kenya, Nepal, Pakistan, Philippines and Sri Lanka](#), increased from [11,401 in 2010](#) to [20,726 in 2019](#). However, these numbers were still a significant undercount as they excluded workers toiling in jobs such as housekeeping, security, valet parking and landscaping services – as hotels often rely on service providers and labour suppliers for these sub-contracted jobs.

State of play for migrant workers in Qatar

Qatar's migrant workers have been under the spotlight since the country was named host of the 2022 World Cup in 2010. [Under intense pressure](#), Qatar introduced several welcome reforms to its Kafala (sponsorship) system and entered into a [three year technical cooperation programme](#) agreement with the International Labour Organization (ILO) in 2017. In August 2020, [the legal requirements](#) for migrant workers to obtain permission from their employers to change jobs (No-Objection Certificate ("NOC")) or to exit the country were officially eliminated. Many [hailed this development](#) as effectively ending Kafala. However, since the announcement, [there have been indications](#) workers must still comply with steps effectively requiring their employer's permission to change jobs. Local legislation also retains several provisions which allow employers to intimidate workers, such as [abscinding laws](#). Stark comments from the [latest visit](#) of the Special Rapporteur on Contemporary Forms of Racism that **“European, North American, Australian and Arab nationalities systematically enjoy greater human rights protections than South Asian and sub-Saharan African nationalities”** indicate the high probability migrants face racial discrimination and abuse at work. In a country where unions are banned for migrant workers, the opportunity for workers to exercise their right to organise and to gain remedy for abuse is still severely limited. The deep power imbalance between migrant workers and their employer makes them vulnerable to abuse.

The [World Cup organisers' 2020 update report](#) on its Worker Welfare Standards recognised the need to “*transition from a focus on construction towards tournament operations... as hospitality [workers]... will become linked to the FIFA World Cup*”. Some properties within the scope of this survey are participating in a pilot to implement these standards. Additionally, a Working Group of over 40 hotels convened by the ILO, Institute for Human Rights and Business, the Ministry of Administrative Development Labour and Social Affairs (MADLSA) and the Sustainable Hospitality Alliance has assembled human resources professionals at hotels across the country and produced a [guidance tool](#) to promote fair recruitment and employment in the industry. The [Sustainable Hospitality Alliance](#) has identified worker welfare in Qatar and the Gulf Cooperation Council (GCC) countries as a priority for the industry. At the time of writing, the charity is delivering a programme on fair recruitment and a number of its members are among the brands surveyed for this report. As the countdown to the World Cup progresses, we look forward to hearing from these organisations on the implementation of such initiatives and the dissemination of learning across the industry, and beyond Qatar and the World Cup.

COVID-19

The COVID-19 pandemic has exacerbated existing structural problems. Since March 2020, the Resource Centre has seen [a significant spike](#) in the number of abuses reported by migrant workers in the Gulf. Hundreds of thousands of workers lost their jobs at the onset of the pandemic and were stranded in Qatar without any income or repatriated without receiving their full salaries or end-of-service benefits. As the Gulf began to open up again, we conducted interviews with NGOs in sending countries, which warned of significant “push factors”, including the dire state of many economies in origin states, which create a corrupt recruitment system and conditions ripe for the abuse of workers. This problem is particularly acute in countries such as [Nepal](#), where remittances make up 25% of GDP. Workers, desperate to support their families, are understandably eager to return to the Gulf and this leaves them vulnerable to exploitation by recruitment agents.

Failing to take responsibility

Despite these clear risks, hotel companies have been slow to grapple with the issues affecting their workforce in Qatar and have shown little improvement since we first surveyed the sector. In Qatar, and the Gulf more broadly, the predominant hotel business model is a “managed” hotel, whereby [hotel properties are privately owned but the multinational hotel companies lend their branding to the hotel and take over the day-to-day operations](#). They effectively become the management company, while the property owner holds contracts with directly employed workers, suppliers and labour providers. Hotel brands told us this means they sometimes lack sufficient influence or oversight in the local context to protect workers. However, this argument betrays the fact that hotel brands are willing to perpetuate a system which does not protect the very same workers whose daily tasks they oversee and whose uniforms bear their logo. The operational control of what workers do remains with the brand and, indeed, jobs are often advertised through the brand's own website, with explicit acknowledgement of them being the employer. We also saw contracts which prominently displayed the brand's logo, despite the hotel not being the legal employer.

Furthermore, companies are assiduous in efforts to control aspects of hotels they regard as intrinsic to the protection of their brand. We found several examples of “brand standards” which provide specifications for the construction, layout and food of branded hotels ([see example](#)). If brands can specify the height of desks in reception, they should be just as able to ensure workers are treated fairly. It was baffling, for instance, that as part of the survey **Marriott** listed a franchised hotel but stated: *“As a franchisee, this property is not reflected in the below information unless otherwise noted.”* **Whitbread** also provided more information for a hotel it owned and operated than for the one it managed. Brands make vast profits from collaborating with owners as part of franchise or management agreements and demonstrate they will take decisive steps to ensure brand standards are met. It is essential brands understand they have clear responsibilities for workers in **all** their branded hotels, whether they are the franchisor, the legal employer or if workers are subcontracted. All workers contribute to the success of the brand and should share the benefits of working for it.

Our previous survey revealed a large gap between brand policies and their practice. It also found no brand could demonstrate it was carrying out effective due diligence on key business partners, such as recruitment agents in countries of origin or labour suppliers in Qatar. Two years on, in this latest survey, only **Hilton** and **IHG** pointed to a due diligence process prior to entering into contracts with property owners. Unfortunately, recruitment processes remain an area where urgent progress is needed to protect the rights of migrant workers.

Several brands are, or were previously, supplied with workers from subcontracted companies who have been linked to allegations of human rights abuses in Qatar and the broader Gulf region over the last year:

- ➔ Security company **GSS Certis** was the subject of three allegations of human rights abuse in the last year. The [first](#) related to poor and cramped living accommodation for its workers (August 2020) and the [second](#) to poor quarantine conditions for its workers (March 2021). The [third](#) related to the detention of migrant rights activist Malcolm Bidali (May 2021), who blogged about the poor working and living conditions he and other migrant workers faced. **GSS Certis** reportedly provided workers to **Frasers Hospitality, IHG, Kempinski, Marriott, Minor** and **Wyndham** (see responses [here](#));
- ➔ [European Guardian & Security Services Co](#) (EGSSCO) was found by the Qatari authorities in May 2021 to have given workers a new contract preventing them from changing jobs for a minimum period of five years. This was in breach of the flagship labour reform abolishing the NOC. EGSSCO stated on its website it provided workers to **Hilton, Katara** and **Marriott** (see responses from Hilton and Marriott [here](#). Katara did not respond);
- ➔ Nepal-based recruitment agency **Vision & Value** was accused of charging recruitment fees to workers destined for the UAE (February 2021). On its website the company listed **Hilton, IHG, Marriott, Millennium & Copthorne** and **Radisson** among its clients (see responses [here](#));
- ➔ [Security Solutions](#) allegedly discriminated against its African workers in Bahrain during 2020 and provided them with contracts which violated workers’ rights under the law. At the time it provided workers to **Rotana** (see their response [here](#)).

The testimony provided by workers employed in branded hotels confirmed that risk of abuse against subcontracted workers remained significantly higher than for directly-employed workers. Brands must urgently develop robust, worker-centric due diligence processes which address the power imbalance between migrant workers and their employers. This involves putting workers at the centre of monitoring and meaningful collaboration with civil society in the region and sending countries to understand and address these risks.

Introduction

This report followed our first survey, conducted in 2018, which looked at 17 hotel companies' commitment to migrant workers' rights in policy and practice. While this first report identified a cluster of four committed companies, it also highlighted a number of areas where industry safeguards for workers are deficient and where hotel workers in the Gulf were at risk of falling through the gaps between global policies and practice on the ground.

To assess progress on transparency and worker welfare among hotel companies in Qatar since 2018, we invited multinational hotel brands to participate in this second survey on migrant workers' rights. The second survey, updated in consultation with civil society and relevant business associations, focused more closely on how policies were being implemented. It looked specifically at how companies ensured business partners and suppliers complied with brand standards on worker welfare and human rights. This included identifying which companies were carrying out the monitoring practices they claim to undertake at the global level, and which were engaging directly with workers through interviews, worker committees and other communication channels.

Companies were invited to answer [28 questions](#), which focused on 12 areas of human rights and labour rights where workers in Qatar are particularly at risk. The company [star tiering](#) demonstrates how companies scored in their answers. Companies were provided with a [methodology](#) which explained how their answers would be scored.

RESPONDERS

- ✓ Accor
- ✓ Deutsche Hospitality
- ✓ Hilton Hotels & Resorts
- ✓ Hyatt
- ✓ IHG Hotels & Resorts
- ✓ Kempinski Hotels
- ✓ Louvre Hotels
- ✓ Marriott International
- ✓ Minor International
- ✓ Radisson Hotels
- ✓ Whitbread

NON-RESPONDERS

- ✗ Best Western International
- ✗ Four Seasons Hotels & Resorts
- ✗ Frasers Hospitality
- ✗ Katara Hospitality
- ✗ Millennium & Copthorne Hotels
- ✗ Retaj Hotels & Hospitality
- ✗ Rotana Hotel Management
- ✗ Wyndham Hotels & Resorts

The 2021 survey sample consisted of 19 multinational hotel companies, which between them make up the majority of hotels in Qatar:

88%

7 of 8 European-headquartered companies (Accor, Deutsche Hospitality, IHG, Kempinski, Louvre, Radisson and Whitbread) responded; Millennium & Copthorne did not respond

50%

3 of 6 North America-headquartered companies (Hilton, Hyatt and Marriott) responded; Best Western, Wyndham and Four Seasons did not respond

50%

1 of 2 Asia-headquartered companies (Minor) responded; Frasers Hospitality did not respond

0%

0 of 3 Middle East and North Africa-headquartered companies (Katara, Retaj and Rotana) responded;



Worker testimony

The report is informed by testimony gathered by partners [Equidem](#), Barun Ghimire, lawyer and migration expert at The Law and Policy Forum for Social Justice ([LAPSOJ](#)), and the [Center for Migrant Advocacy](#). Interviews were conducted between April and June 2021 with workers at hotels in Qatar who originated from countries in East Africa, South Asia and South-East Asia. In total 18 workers provided the testimony referred to throughout this report, with the majority of workers being directly employed by the hotels, although they also provided insight into the treatment of subcontracted workers they work with.

Owing to the fears many vulnerable workers have of their employers or the authorities in Qatar, only four women and two subcontracted workers were able to be interviewed. The [detention of security guard Malcolm Bidali](#) also occurred during the testimony gathering, causing work to be paused until the safety of the researchers and workers could be ensured. The testimony remains anonymous owing to the very real risks of reprisal against workers still in Qatar. Similarly, most interviewees work, or worked, in brands surveyed for this report (whether they responded or not) but we have avoided naming hotels.

The testimonies make for alarming reading; many of the workers experienced a broad range of labour abuse, including practices that are indicators of forced labour. Almost all the workers reported violations of their conditions of employment, paying extortionate recruitment fees, being unable to change jobs without fear of reprisal despite the reforms, and discrimination regarding pay and position dependent on nationality. There was also a stark difference in the treatment of workers directly employed by the hotel and those who are contracted from labour providers. Subcontracted workers were allegedly being paid less than directly-employed workers doing the same job, having difficulty accessing their identity documents, or suffering delayed pay and illegal deductions from their wages.



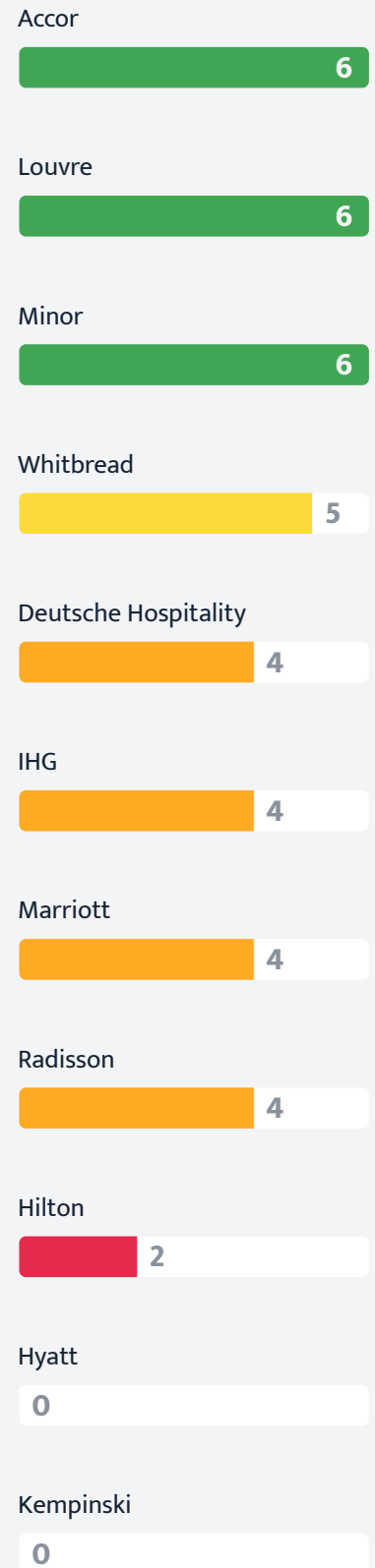
Survey analysis

Transparency of business relationships

Disclosure of supplier and factory names among the higher tiers of contractors is [a well-established practice of corporate transparency](#), particularly among other sectors such as apparel, consumer goods distributors and technology. Changing expectations from stakeholders, including investors, human rights groups and unions, coupled with new mandatory human rights due diligence laws based on corporate reporting, mean companies should routinely disclose who they contract to provide them with goods and services. Disclosing this information empowers key stakeholders, such as unions, workers and human rights NGOs, to monitor and mitigate risks to workers. Any company wanting to adopt meaningful worker-centric due diligence should do this without delay.

While most companies provided details of the property owners they partner with in Qatar, as well as on their workforce demographics, disappointingly, only four brands (**Accor**, **Louvre**, **Minor** and **Whitbread**) disclosed which companies they contract to provide labour and recruitment services. Others cited compliance and confidentiality clauses allegedly preventing them from doing so, despite this information often being publicly available elsewhere, usually by the labour providers or recruitment agencies themselves. **Hilton**, **Hyatt** and **Kempinski** were the only brands which declined to provide details of their property partners in Qatar, while **Hyatt** and **Kempinski** also failed to give a full breakdown of how their workforce is structured.

3.7 average score | 6 max score



Policy commitments and due diligence approach

Policy

Of the 19 companies surveyed, most had publicly available human rights policies. The seven companies which did not provide a human rights policy, or for whom we could not find one, were: **Accor**, **Deutsche Hospitality** and **Louvre** among the responding companies (despite all three stating they had a policy), and **Frasers Hospitality**, **Katara**, **Retaj** and **Rotana** among the non-responders.

In terms of better practice, **IHG**, **Marriott**, and **Kempinski's** human rights policies included reference to a specific governance and oversight function with responsibility specifically for the implementation and monitoring of the human rights policy.

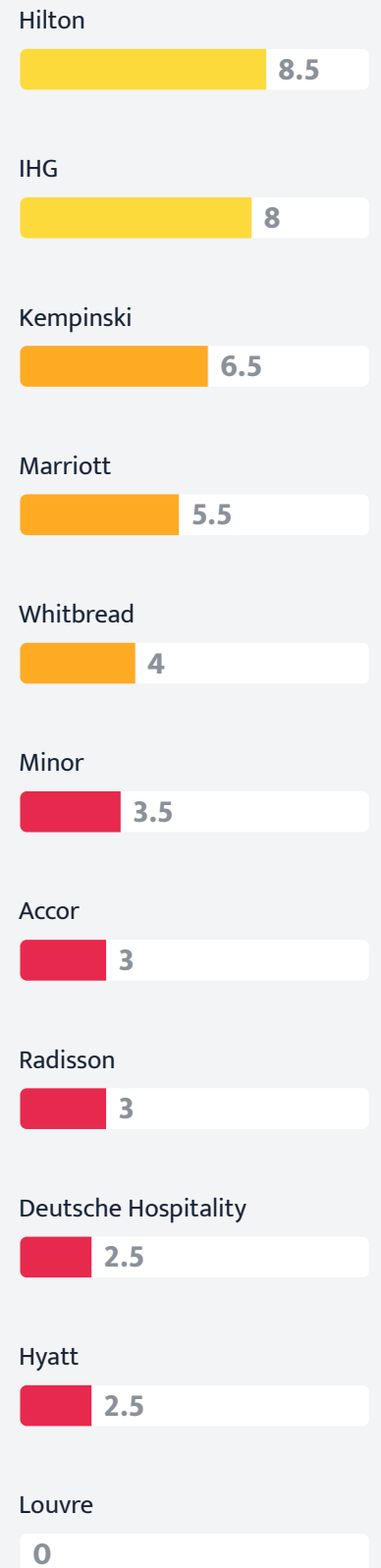
All responding brands, except **Louvre**, had a code of conduct which placed some level of expectations on suppliers in terms of labour rights. However, migrant workers were barely mentioned in these policies. No brand had a specific migrant worker policy, despite migrants comprising [16% of the tourism workers in the European Union](#) and [20% of the hospitality workers in the USA](#), where most are headquartered, and [very nearly 100%](#) of hotel workers in the Gulf. Among the non-responders, we could only find a publicly available supplier code of conduct for **Wyndham**.

Accor, **IHG**, **Kempinski**, **Radisson** and **Whitbread** had clear language in their policies which stated suppliers must comply with their standards. **Hilton**, **Hyatt**, **Marriott** and **Minor** had weaker or ambiguous wording in human rights policies or codes of conduct. **Minor**, for example, stated they *"encourage[e] stakeholders... franchisees and suppliers, to uphold and adopt the principles"*, while **Hyatt** stated they *"prefer" to do business* with those who comply with their labour rights standards.

Risk assessment

Only three companies (**Hilton**, **IHG** and **Marriott**) explained how they conducted human rights due diligence specific to their business operations in Qatar. While not specific to Qatar (and not scored for this survey), **IHG's** work in Oman (see below) should be recognised as an example of better practice. Disappointingly, no company demonstrated proactive engagement with stakeholders, such as

4.3 average score | 12 max score



migrant rights NGOs, diaspora organisations in the region or civil society in key sending countries, as part of their risk assessment. However, **IHG** and **Whitbread** referred to engagement with external organisations (Article One and Stop the Traffik). **Marriott** cited engagement with the Sustainable Hospitality Alliance and the World Travel and Tourism Council in their risk mapping. **Hilton** said it incorporates recommendations from the [Working Group for Sustainable Growth and Decent Work in Qatar's Hospitality Sector](#) into its due diligence process. Other brands, including **Radisson** and **IHG**, told us elsewhere in the survey they also engage with the Working Group toolkit. **Accor** and **Kempinski** referred to partnering with the Supreme Committee (the body overseeing preparations for the World Cup), but companies should note this does not absolve them of doing their own risk assessment and due diligence, particularly as this is time-limited and brands need to build sustainable and long-term systems.

Crucially, no company put workers at the centre of their risk assessment in Qatar. The only brands which mentioned employee involvement were **Hilton**, regarding its work in recruitment in Nepal, and **Kempinski**, which stated its human resources staff and general managers meet with employees and suppliers, and conduct visits to accommodation. This is commendable and shows such practice is perfectly feasible.

Better practice:

InterContinental Hotels Group in Oman – risk assessment

In early 2020, IHG contracted Article One to undertake a labour standards assessment in Oman which focused on migrant workers. Notably, the assessment involved consultation with a range of stakeholders, including internally with hotel leadership and 293 directly employed or outsourced workers, and externally with “local and international NGOs”. The assessment was based on principles codified in the [Dhaka Principles](#) and [SHA Principles on Forced Labour](#) and, significantly, found that *“compared with direct employees of the hotel, workers employed through third parties (casual and contract workers) were more likely to have experienced potential forced labour issues, such as retention of passports, recruitment fees, poor living conditions and difficulties obtaining NOCs”*.

Despite risks to migrant workers in Qatar and the broader Gulf being well-known, only four companies (**Accor**, **Hilton**, **IHG** and **Marriott**) identified at least three workforce risks likely to impact workers in their hotels in Qatar. These included fair recruitment practices, mechanisms to address grievances, conducting due diligence of service providers and placement agencies, proper payment of wages and working and living conditions. While **Kempinski** identified three risks, these appeared to be risks presented by their workforce demographic to their business, not to the migrant workers themselves.

Three companies (**Minor**, **Deutsche Hospitality** and **Whitbread**) disclosed just one risk (all regarding occupational health and safety). The remainder did not provide any meaningful detail on the human rights due diligence they undertake in Qatar and none of these brands disclosed any identified workforce risks.

Selection of business partners

A key finding from the 2018 survey was the heightened risk of exploitation to migrant workers given the highly fragmented nature of the hotel industry; 39 out of 41 (95%) of the hotel properties who responded to this survey operate under a managed model of ownership. Based on workforce data disclosed by the responding companies, fewer than 1% of workers at their properties are directly employed by the hotel brand.

A further 17% are employed by companies contracted to provide cleaning, security, facilities management and hospitality services, leaving the majority (80% hotel workers) employed by the property owner (these workers are referred to as directly-employed in this report). However, the figure relating to subcontracted workers is likely to be a significant undercount as we know from company disclosure that subcontracted workers were the first to be made redundant during the COVID-19 pandemic; interviewed workers also stated there were previously more subcontracted staff. This figure is likely to increase in the run up to, and during, the World Cup.

Only **Hilton** and **IHG** detailed how labour rights risks and treatment of migrant workers are built into their vetting process for selecting hotel property owners. Only **Hilton** disclosed a figure (1%) for the number of business relationships they consequently reject, although they said the actual figure is higher as many potential partners are “*rejected prior to formal due diligence.*” This is a marginal improvement on the first survey, where only **Hilton** reported they undertook due diligence on property owners.

Most companies (**Accor, Deutsche Hospitality, Hyatt, Kempinski, Louvre, Marriott, Minor, Radisson** and **Whitbread**) did not report how labour rights risks are considered prior to entering into partnership agreements with property owners. **Minor**'s answer suggests tenders are awarded solely on a lowest-cost basis.

Better practice:

Hilton – selection of property owners

Owners and suppliers are obliged to make representations regarding their legal history related to human rights and provide sufficient information to allow vetting, including on issues such as recruitment fees, wages, working/living conditions and health and safety. Due diligence is run by the Legal Compliance Team via a protected budget to ensure that business teams have no incentive or ability to influence due diligence risk assessments.

Monitoring of labour suppliers

In contrast to their policy commitments and requirements within supplier codes of conduct, no brand satisfactorily answered how they monitor the compliance of their standards. **Hilton** and **IHG** said they **reserve the right** to carry out unannounced audits, yet they provided no detail on how this is operationalised. A number of brands also mentioned audits in other parts of the survey. While audits can play a role in due diligence concerning some financial matters or checking contracts, [audits alone do not constitute human rights due diligence](#) and are entirely inadequate to identify and monitor evolving violations.

Social audits have long been used in other industries, such as apparel and electronics, and have categorically [failed](#) to prevent serious and systemic labour abuses. Audits only provide a snapshot of the situation at a specific time and rely on the [superficial](#) participation of workers. They also fail to look at the drivers of abuse, such as the business model of the entity itself or, in the case of Qatar, the Kafala system. Instead, we encourage hotels to adopt meaningful and systematic [rights holder consultation](#) to design [worker-centric due diligence](#) approaches. However, brands should note this will require a tailored approach that deals with the risks and power imbalances specific to Qatar and their business models. They also need to be mindful if they uncover issues with suppliers, their first response should be to work with the supplier or recruiter to improve their practice. Simply ceasing to use that contractor will do nothing to change the systems in place, leaving many workers worse off and without remediation.

Fair recruitment

The [charging of recruitment fees to workers in the Gulf](#) for securing jobs is one of the single biggest drivers of abuse in the region. This long-standing practice sees workers pay the equivalent of between one month and one year's salary to recruitment agents in their country of origin, who have contracts with employers in the Gulf to secure work. Qatar's labour law [prohibits the charging of fees](#), however, worker testimony confirmed it remains a significant issue within the hotel sector, with workers paying large sums to agents in their country of origin. Eight out of 18 of the interviewed workers paid between USD500 and USD2,360 (almost nine months' salary at the new legal minimum) to secure jobs in Qatar's hotels. Recently, due to redundancies during COVID-19, several workers were employed locally while migration corridors were closed, meaning this is likely to represent significantly fewer workers than would normally pay fees. Overseas recruitment is particularly likely to be the case in particularly likely to be the case in the run-up to the World Cup when demand for workers will increase. Many workers are burdened with high-interest loans taken to pay fees for several months and even years. Crucially, none of the workers reported their fees had been repaid by their employer.

“ I paid \$1,000 commission to secure the job. I have still not paid up in full the loan...No one has asked or offered to reimburse this cost, everyone is just keeping quiet.”

Kitchen worker from Kenya

Unlike other areas we explored with workers, this appears to be a risk to both directly employed workers and subcontracted workers. However, three workers reported they were recruited directly by hotels in their country of origin and did not pay fees, demonstrating there are ways to overcome this abuse if hotel brands choose to do so. **Marriott**, for example, stated they have recruited workers directly from countries of origin, as well as using agencies.

“ Yes, I paid 200,000 BDT [\$2,360] to my contact at the hotel... I had taken a loan from a local bank in Bangladesh. I cleared it in 2 years.”

Steward from Bangladesh

1.7 average score

8 max score

IHG



Hilton



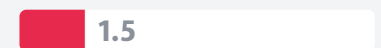
Kempinski



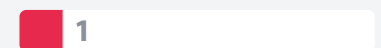
Radisson



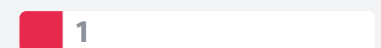
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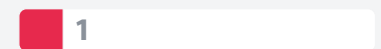
Accor



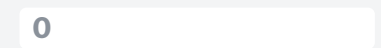
Minor



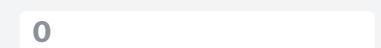
Whitbread



Hyatt



Louvre



We asked brands whether they had a **public policy** commitment to the “[Employer Pays Principle](#)”. Although many brands stated they comply with this principle, an analysis of their policies revealed only two companies’ public policies have committed to this principle: **Kempinski** and **Radisson**. **Hilton, IHG, Marriott** and **Whitbread** had public policies prohibiting worker paid fees, however, these companies’ policies did not clarify who is responsible for paying the fees associated with recruiting workers. **Deutsche Hospitality’s** response stated “*costs must be borne by the receiving Business unit.*” However, it then goes on to make three exceptions: “*Attestation of documents in home county of the candidates[,] Renewal of any documents required for visa process[,] Pre-medical tests prescribed by the authorities.*” The ILO⁵ states that medical and administrative costs, such as those **Deutsche Hospitality** exempt from reimbursement, should be considered related to the recruitment process and, therefore, borne by the employer.

“ I have to paid QAR 7,000 (\$1922.55) for visa and ticket fees for agent.”

Receptionist from Nepal

Accor, Kempinski and **Hilton** were the only brands which described how they routinely conduct interviews with workers to establish if fees have been paid. **IHG** stated it updated their brand standard guidance in 2020 to “**recommend** that inductions should include interviews to determine whether recruitment related fees have been paid so remedial action can be taken”. **Deutsche Hospitality** provided: “*the HR representative may ask the candidate if they are being charged for any recruitment fees.*”

Accor said “[r]eference & [b]ackground checks are conducted on Recruitment Agencies before signing the agreement.” **Louvre** and **Hyatt** both described involvement of HR professionals, but neither detailed any due diligence steps in relation to recruitment agents and fees.

Marriott said it used “vetted” recruitment agents but did not detail the process for vetting them, apart from saying it reviewed the legal documentation relating to licensing as part of the bidding contract. **IHG, Radisson, Whitbread** said they used accredited agencies approved by the embassies or Qatar Visa Centers but did not add any further detail. Both **Radisson** and **Whitbread** stated they also had contractual provisions in place prohibiting recruitment fees. **Hilton** was the only company which disclosed taking active steps (see below) which went beyond merely relying on contractual terms specifically banning recruitment fees.

Better practice:

Hilton – due diligence on South Asia – Qatar migration corridor

Hilton said it conducted in-person visits and interviews with operating hotels in Qatar, recruitment agencies and candidates. This resulted in a new preferential list of suppliers being identified, which is reviewed on an annual basis. Hilton also said it conducts interviews to establish if workers have paid fees during the recruitment process, onboarding and after they are employed.

⁵ See: [General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs \(ILO\)](#)

While most responding brands relied on “accredited” agencies in sending countries and some made explicit in contracts that recruitment fees should not be charged, we have noted [instances of “accredited” agencies charging fees](#) to workers. Therefore, simply relying on this does not constitute sufficient due diligence. Furthermore, no hotel brand detailed any due diligence process concerning outsourced workers and how they were recruited.

Disappointingly, no brand revealed the amount of fees reimbursed to workers. Only **IHG** provided figures for how many instances of recruitment fees it had detected in 2019 and 2020. Although **Hilton** said it had detected instances of fees paid in 2019 and 2020, it did not disclose the number. **Hyatt** did not provide any data and the remaining brands said no instances of recruitment fees had been detected in 2019 and 2020. Given how endemic the payment of recruitment fees is, we believe it is highly unlikely no hotel workers in almost 80 properties paid these fees. Assuming that is correct, failure to detect this issue suggests existing due diligence processes are not fit for purpose.

Encouragingly, some SHA members cited active engagement with the Working Group toolkit to improve recruitment practices beyond their Qatar operations. For example, **IHG** stated it “*will seek to adopt all relevant resources and learnings in other locations*” and **Radisson** disclosed “*learnings from the working group are already applied in the wider scope of RHG’s operations*”, demonstrating the potential scope for improvement in this area globally.



Payment

Many hotels referenced benchmarking models for setting wages, which looked at industry rates. However, no brand detailed how they established a living wage as part of this calculation. Only **Hilton**, **IHG**, **Kempinski** and **Marriott** specified salaries were set in line with non-discrimination principles. Ten of the interviewed workers stated Arabic workers were paid more than migrant workers from Africa and Asia, clearly demonstrating this needs to be more of a focus for brands.

“ The payments we receive are significantly low as compared to other employees who were directly employed. Also, there is persistent delay in payment of salaries.”

Kitchen helper from Kenya

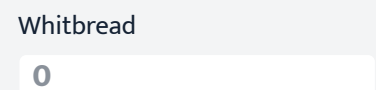
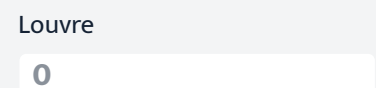
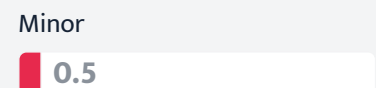
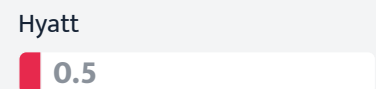
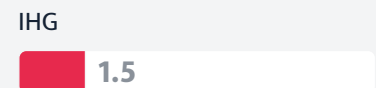
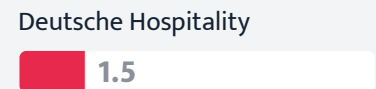
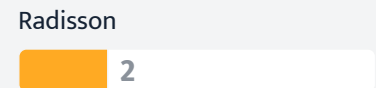
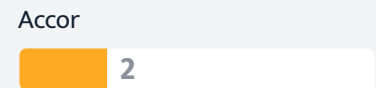
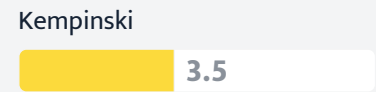
Brands described, to varying degrees, their internal systems for ensuring directly-employed workers were paid on time. **Accor**, **Hilton** and **Marriott** described specific protocols they say prevents illegal deductions. **Kempinski** and **Marriott** specifically said the only deductions permitted are for salary advances or loans.

“ Yes, we do not get our salary paid in time. I haven't gotten my salary since the past 3 months. They even pay salaries differently to us. We are only paid 25% of what Qataris get paid for the same job.”

Restaurant worker from Nepal at non-responding brand

Interviews with workers revealed serious issues around pay for subcontracted workers, such as late payment, unclear deductions and being paid significantly less than directly-employed workers. To date, our own research shows workers in Qatar reporting [unpaid or delayed wages in 73% cases](#). However, very few brands were able to describe proactive steps ensuring subcontracted workers are paid properly and merely cited the [discredited Wage Protection System \(WPS\)](#) as assurance. Some appeared to believe they had no responsibilities for these workers. **Minor** stated: “We are not held liable for the monthly salary of our casual staff and contractors...” and **Louvre** stated: “We pay suppliers on time at the end of each month. **Whether they pay their employees or not does not concern us. Our own employees are paid on time at the end of each month.**”

1.5 average score | 8 max score



IHG admitted it does not have “visibility” of subcontracted workers through the WPS and stated: *“Some hotels hold informal interviews with the workers to assess if regular payments are being made.”* They also observed that rehousing workers in hotel staff accommodation (due to COVID-19) *“provid[es] them with the opportunity to assess the status of payments on a more regular basis.”*

Better Practice:

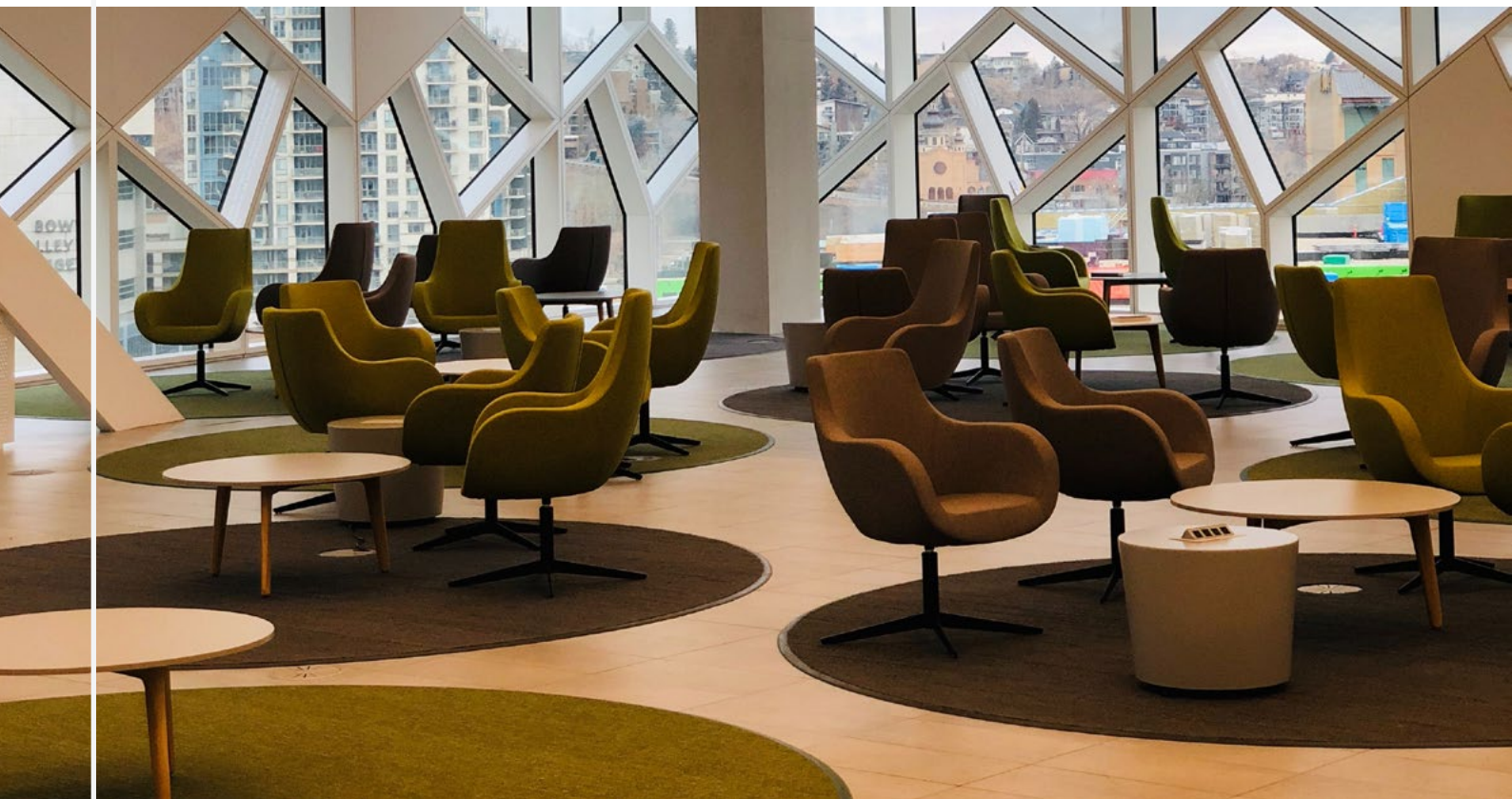
Kempinski – monitoring supplier wage payments

In contrast to other hotels, Kempinski displayed a much stronger awareness of non-payment among their subcontracted workforce and the need to engage proactively with both supply companies and workers. They state that *“[s]uppliers need to be able to provide evidence in the format of payslips or payroll records that there was no wage paid below the minimum”* and also *“Hotel HR also checks **regularly** with our Outsourced Staff to verify whether they have received their salaries on time, and in full (**HR conducts one to one sessions with randomly selected employees**)”*. It was also noted Kempinski reviews WPS records periodically in order to check that wages are being properly paid to subcontracted workers.

Other issues brought to light through the interviews included subcontracted workers not being provided with accommodation by the hotels as part of their package, providing an additional financial burden on workers with the least financial means. It was also reported that subcontracted workers are asked to work overtime at short notice and, as a result, end up not taking scheduled weekly breaks.

“ Unexplained deductions are made when we are unable to work due to being sick.”

Driver from East Africa



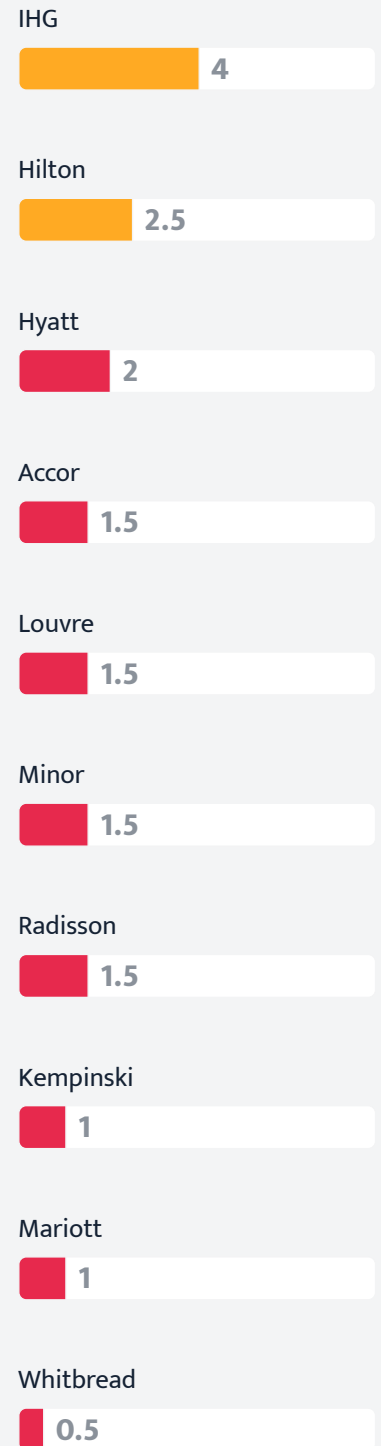
Freedom of movement

Retention of workers' identity documents is [widely reported in Qatar](#), despite the 2009 prohibition on holding workers' passports. We asked brands what systems were in place to ensure workers had unimpeded access to their passports. All brands confirmed workers either had access to their documents or retained custody of them in line with labour law.⁶ Beyond this, **IHG** said workers had “*personal lockable storage*” facilities. Interviews with directly-employed workers confirmed, while issues with identity documents had been common in the past, this had largely improved: workers now retained these documents or could access them without concern. Nevertheless, one directly-employed worker (at a non-responding brand) said: “*We can access passports but not all the time.*”

The interviews also uncovered remaining problems around identity documents within the subcontracted workforce. One worker said, “*Indirectly employed workers have problems in accessing their passports, they are only provided with the identity card and staff card,*” and another confirmed the practice remains broadly widespread among the private sector, where “*passports and other documents of workers of other companies and factories are seized by the respective employers and [workers] aren't even allowed to walk outside the premises.*” Only **Kempinski** and **IHG** indicated they take some active steps to monitor subcontractors. **Kempinski** said it conducts spot checks through interviews with subcontracted workers and, if issues are uncovered, they audit the subcontractor concerned. **IHG** said it tries to assess this through informal conversations with workers.

Another major finding from our previous report was that workers were subject to curfews in their accommodation; this was reflected in our 2018 interviews, particularly among women workers. One worker (in a non-responding hotel) interviewed in 2021 said: “***The safety of female workers was prioritised and they were kept in a different hostel. They were not allowed to move alone.***” While many brands stated they did not impose curfews, no brand could point to a specific policy governing their worker accommodation which specified workers should not be subject to curfews. **Radisson** meanwhile stated: “***... [W]e have the curfew for the female employees to ensure their safety and well-being.***” While seemingly well-intentioned, women should not be robbed of agency to decide their movements for themselves.

1.7 average score | 8 max score



⁶ The 2015 law regulating the entry and exit, and residence of expatriates stipulates that employers can hold migrant workers' passports if the workers request this in writing and provided it is returned upon request.

Freedom to change job

“ The hotel doesn't say no directly but they are frustrated and there is the threat of deportation with the CID [Criminal Investigation Department] being on call and side with the hotel.”

Laundry worker from Uganda

Despite the abolition of the NOC, an apparent flagship [reform](#), following intense pressure from the business lobby in Qatar there are signs of a rollback. In January 2021, Migrant-Rights.org [reported](#) that although not required in law, workers are routinely asked to attach a resignation letter when they apply to change jobs through MADLSA's online process. They pointed out that additional administrative steps such as these, particularly when the company needs to acknowledge the letter with a stamp or signature, potentially act as a *de facto* NOC.

“ After my contract finishes, I can change my job. But honestly, it's not that easy. We need to submit lots of paper to transfer.”

Steward from Bangladesh

We asked the hotels how many workers had requested to change jobs under the new system and how many were granted. **Accor, Hilton, IHG, Minor** and **Radisson** provided figures for the number of workers who requested to change their jobs under the new system. **Kempinski, Hyatt, Marriott** and **Whitbread** did not provide the data, although **Hyatt** said “numerous” workers had transferred. **Louvre** provided data on the number of requests, but also highlighted additional administrative requirements. **Radisson** was the only company which told us some workers' requests for transfer were not granted by MADLSA.

“ The problem is having to upload resignation letter that should first be signed/stamped by the hotel.”

Food & beverage hostess from the Philippines

Interviewees confirmed this was an area of serious concern, with several referring to the NOC, seemingly unaware it had been abolished. Twelve out of 14 workers that were asked how easy it was to change jobs either stated they feared retaliation or their answers revealed barriers to changing jobs. One worker said he had paid his previous employer (a hotel) a fee to change jobs. Another indicated they were allowed to change jobs, but only after their contract ended. However, under the new system, workers [should be able to change jobs](#) by giving one or two months' notice, depending on the duration of their employment. Three workers mentioned a fear of being deported.

“ In news channel and media, I have heard it is free to change the job, but I have heard from some of my colleagues they are having difficulties to change jobs. Some of them fear they will lose their jobs”

Receptionist from Nepal

“ We are not able to do this [change jobs] out of fear and the arrangement with the agent.”

Kitchen helper from Kenya

A significant concern was that even some of the hotels do not appear to be aware of the law change.

Kempinski, Louvre and **Marriott** referred to the NOC in their answers and **Marriott** added: “In some cases, the operator must obtain ownership approval to provide NOCs.” **Accor, IHG** and **Radisson** admitted a formal or written resignation is required, which chimes with what Migrant-Rights.org reported. If the process requires certain administrative steps, we urge hotels to do everything they can to simplify this process for workers. Hotels should be actively informing and training their workforce on their right to change job and taking immediate steps to ensure no worker feels intimidated for requesting transfer.

“ On the new law to be honest, it's just there on mere paper because these employers are not signing the resignation letters. Instead, they go ahead and cancel your visa and before you know it, they forcefully repatriate you back to your country. On extreme cases they go further and report you as a runaway worker to the CID so they call the police on you and you are subsequently deported with a ban on re-entering Qatar... Employers intimidate workers and scare them by making example of their colleagues”

Driver from East Africa



Health & safety and living conditions

1.3 average score | 7 max score

Heat stress

Temperatures can reach 50 degrees Celsius in Qatar during summer and there has been strong scientific evidence linking heat stress with the death of migrant workers in the country. Several hotel roles require outdoor working, such as security guards and pool attendants. Most hotels outlined some steps to address this issue, although most did not go much beyond those steps mandated by the government, which have been repeatedly been criticised as inadequate by NGOs and academics. Hotels were also largely unclear about how they monitor heat stress among their subcontracted workforce. For example, **Accor** said “[t]he roles classified as outdoor work are being performed by subcontractors and they work in accordance with the Qatar labour law rules and regulations for outdoor work. We do not have a specific policy in addition to this.”

Hyatt, Kempinski, Marriott and **Minor** provided more detail on how they prevent heat stress and set out concrete steps, including rotating shifts, frequent breaks, providing protective equipment and a summer “heat allowance”. **Kempinski** also said it ran awareness campaigns to ensure workers understood the importance of hydration. **Marriott** explained how managers monitored this among both directly employed and subcontracted workers, particularly among new hires “for the first 14 days, until they are fully acclimatised to the heat.”

Living conditions

Living conditions for migrant workers in Qatar has long been an issue. During the initial phase of the COVID-19 pandemic, there were concerns that cramped, dense and unsanitary accommodation was driving a surge in infections due to the impossibility of social distancing. As described above, **GSS Certis**, a supplier to numerous hotel brands, was accused of providing poor and cramped living conditions. Our own tracking of Gulf-wide allegations shows precarious or inhumane living conditions are reported in one in five cases, and insufficient or inadequate food provision in one in four. In the year since the pandemic arrived in the Gulf, reports of poor living conditions rose almost five-fold on the previous year.

Deutsche Hospitality



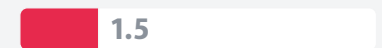
Kempinski



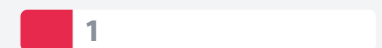
Marriott



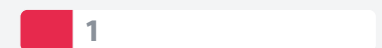
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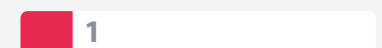
IHG



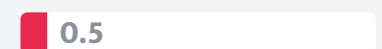
Minor



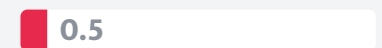
Radisson



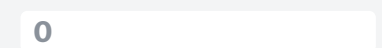
Hilton



Whitbread



Accor



Louvre



No brand provided their specific standards on worker accommodation in Qatar for public sharing, although **Deutsche Hospitality, IHG** and **Kempinski** provided some detail on issues covered by their standards. **Hilton** merely asserted their accommodation standards were “*in line with international best practice and are managed by Hilton’s Human Resources department*”, but did not detail in which ways. No brand specified the maximum room occupancy.

In terms of monitoring, **Deutsche Hospitality, Hyatt, Kempinski, Louvre, Marriott, Radisson** and **Whitbread** (for one hotel) referred to periodic or regular inspections of sites, but did not disclose the substance of these inspections. **Minor** simply referred to monitoring carried out by the Qatari authorities. While site visits to accommodation are undoubtedly an important part of monitoring standards, disappointingly, no brand mentioned how they engage with workers to assess accommodation standards.

Most brands provided no information on how they monitor the living conditions of their subcontracted workforce. Indeed, **Accor** admitted it does not currently have a monitoring process for this. Of their business partners and service providers, **Deutsche Hospitality** said: “*HR must ensure that they conduct a site visit of these facilities to check for compliance to standards.*” **Kempinski** was the only brand which mentioned how it proactively sought to monitor worker accommodation for subcontracted workers contractually, although they said this was only on an “*ad-hoc basis*”. **IHG** also referenced audits it undertook after becoming aware of issues with the accommodation of its subcontracted workforce. However, this does not amount to a proactive monitoring process in either case and the reliance on audits does not constitute human rights due diligence.



Physical & sexual abuse, exploitation and harassment

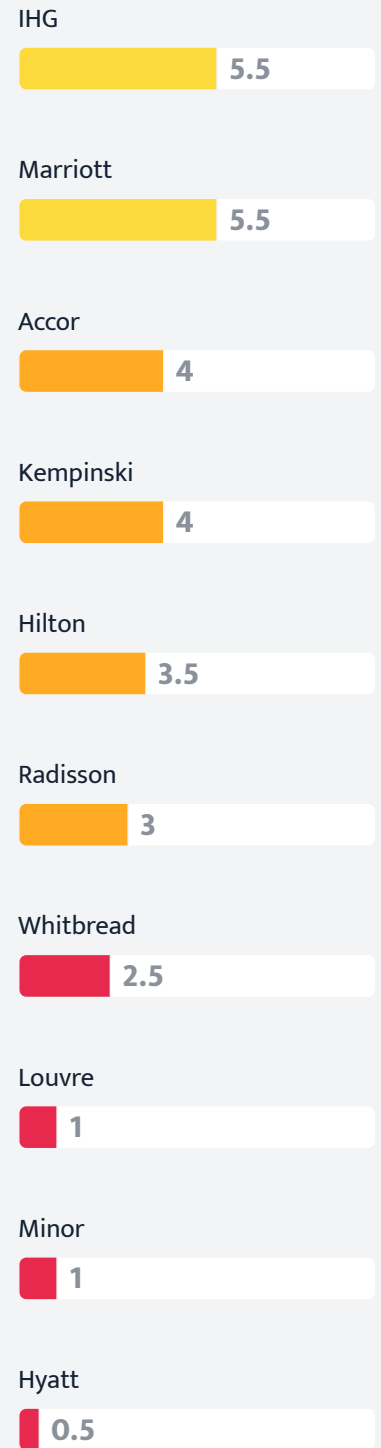
The risks of [child exploitation](#) in the hotel industry, particularly in relation to mega sporting events, are well publicised and the industry has supported a number of [initiatives](#) on this issue. What is less well-reported is the [risk of sexual abuse and harassment of \(particularly women\) hotel workers](#) during such events, and indeed, during the ordinary course of their work, from colleagues, management and guests. Most roles in hotels that typically employ women, such as housekeeping, are isolated by nature and expose workers to abuse from guests. Many hotels also have spas run by third-party providers or beauty parlours where the [risk of sexual harassment or violence is heightened](#). Hotel management is reportedly [naturally resistant](#) to act against guests and the power imbalance between workers and guests is exacerbated further given the risk from speaking out about worker abuse in Qatar.

Almost all brands pointed to policies which covered abuse and harassment, sexual or otherwise, in the workplace. The policies of **Accor** and **Marriott** acknowledged the person originating the harassment could be a guest. Brands which did not point to a public policy, or one they were prepared to make public, were **Minor** and **Hyatt**.

Hilton, **Hyatt** and **IHG** said these policies were disseminated via annual training on their code of conduct for all workers in their managed hotels, including subcontracted workers. All other hotels stated that workers are trained or provided with their policies at their induction. **Marriott** also said it “*periodically reinforces these policies.*”

However, there was minimal discussion of engagement with business partners and inadequate descriptions of support and protection for workers from most companies. Only two companies (**IHG** and **Kempinski**) described steps taken to engage business partners contractually on policies to safeguard workers from abuse and harassment. This was done through clauses within management agreements or compliance with their supplier code of conduct.

3 average score | 10 max score



Most companies described very little information on investigations and remediation. In an example of better practice, **Kempinski** stated: *“Should there be any indications of malpractice by a supplier through whistleblowing from outsourced staff or external sources, the improvement areas need to be sent to the supplier as a warning and be rectified within a given deadline of maximum 30 days, after which an immediate renegotiation of the contract, and if required change of provider, needs to take place.”* However, this appeared to be **Kempinski’s** general approach, rather than specifically targeting these types of serious allegations. **Marriott** said its *“...policy also provides that management should follow-up periodically with the individual who reported the behaviour to confirm that the offending conduct has stopped. Managers who fail to promptly address complaints of harassment from their associates are also subject to discipline.”*

Information from companies on support measures for workers who made reports of abuse was similarly thin. **Accor**, however, was able to provide more detail and said: *“The investigation is conducted as needed in strict confidentiality. Assistance of Medical and criminal authorities are provided as required by the situation...”*

Disappointingly, only **IHG** provided figures for the number of grievances raised in relation to physical and sexual abuse, exploitation and harassment, although it did not disclose figures in respect of its subcontracted workforce.



Representation and remedy

In Qatar, rights to freedom of association and expression are particularly curtailed. Migrant workers are banned from forming trade unions and collective bargaining, providing them with few opportunities to raise grievances strongly and effectively with employers. In 2019, Qatar introduced a reform permitting the creation of [joint committees](#) within companies employing over 30 workers. Joint committees are an alternative forum through which equal numbers of workers and department representatives can meet to discuss and bring collective disputes to the attention of management. Importantly, worker representatives may be elected by their peers.

“ No, we don't have any worker committee of the hotel workers”

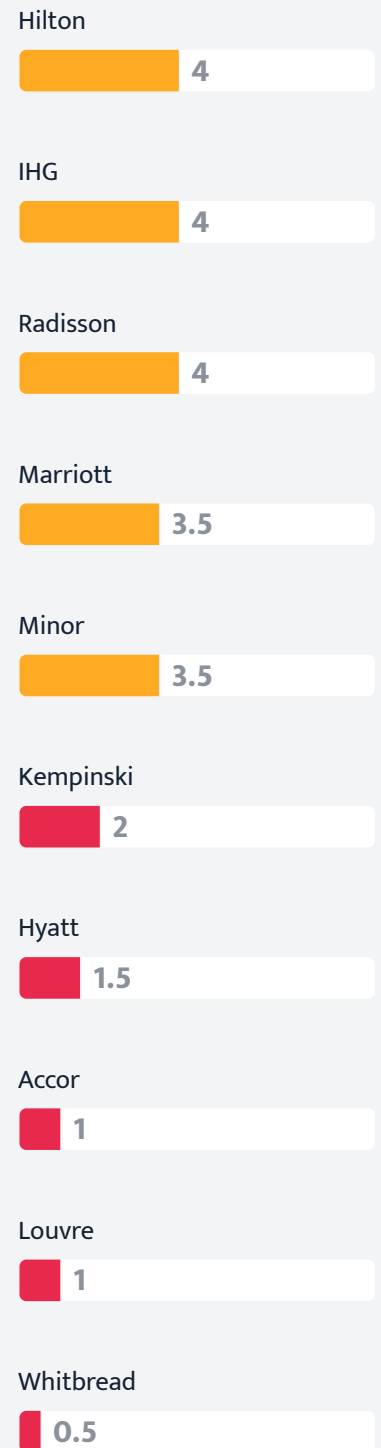
Receptionist from Nepal

When asked whether their hotels ran committees or an equivalent mechanism to enable worker organising and resolve disputes regarding worker welfare, **Hilton, Hyatt, Kempinski, Louvre, Marriott, Minor** and **Radisson** described forums or bodies to convene workers and management. Of those brands with multiple properties in Qatar, only **Hilton, Marriott** and **Radisson** confirmed each property ran a separate committee for workers.

IHG mentioned they had “social welfare committees” in two of their hotels and stated it is “currently working on gathering worker voice best practice.” **Deutsche Hospitality** said there were no formal committees, but informal committees “may be formed under the guidance of human resources”, illustrating the limitations of relying on voluntary initiatives.

Radisson provided the most detail on how the committees were constituted, saying worker representatives were selected voluntarily and by peers: “The hotel has a committee with 37 members representing different nationalities / departments / genders / religions. They have been selected by calling for nominations from the departments and on voluntary basis.” By contrast, worker representatives at **Minor** and **Louvre** were chosen by management.

2.5 average score | 9 max score



“ Such bodies or organizations are highly discouraged at the hotel.”

Driver from East Africa

These statements by brands run in stark contrast to the testimony provided by workers. All workers who were asked whether there were committees or other bodies for communication with management said no such bodies existed at their hotel. This suggests that, even where a committee has been formed, workers were not aware of it and it does not function as an effective forum for worker representation and voice. Workers also appeared unaware that forming such a body was permitted in Qatar - another indication reforms on paper have yet to be effectively communicated to those they intend to benefit. Hotels have a clear role to play in ensuring workers in their hotels are aware of, and can access, such forums.

“ In Qatar we can't make any labour community or alliance.”

Steward from Bangladesh

Grievance mechanisms

The [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) outline eight features of an effective [Operational Level Grievance Mechanism](#): they must be legitimate, accessible, predictable with a clear procedure, ensure fair and respectful engagement between parties, transparent, in line with internationally recognised human rights, a “source of continuous learning”, and based on dialogue with relevant stakeholders.

“ ...due to language barrier with the administration, we face several difficulties. In addition to that, the employer or company owner only listens to senior workers which make it extremely difficult for us to lodge a complaint”.

Nepali restaurant worker

Almost all companies described mechanisms or communication channels implemented by their hotels (for example, all operate anonymous whistleblowing hotlines or reporting channels such as comment boxes), but none aligned fully or even mostly with the UNGPs. Furthermore, none satisfactorily described how their mechanism was specifically used in Qatar. Not one company disclosed avenues of stakeholder engagement, which are crucial to legitimising the process and improving the effectiveness of the mechanism.

“ They haven't done anything about the tight housing arrangement despite the many [COVID-19] cases. We are afraid to report to the government because the complaint mechanism will ask for your QID that is tied to the sponsor and they will call the sponsor so there is no anonymity. You will have to confront the management and that is putting your job at risk.”

Administrative officer from the Philippines

Overall, workers said they were aware they could, in theory, approach human resources or supervisors with any problems. However, in practice, clarity on the process, as well as issues around language accessibility and hierarchy within hotels, inhibited many workers from making complaints.

“ Every worker has right to report any problems even without intimidation but to have a good relationship with management, workers don't want to report for normal matters, but if the situation is worse, they are allowed to report to HR.”

Steward from Bangladesh

Only **Hilton**, **IHG** and **Radisson** made reference to provision of their mechanisms in more than one language, but it was unclear how this pertained to their migrant workforce in Qatar. **Hilton** and **IHG** described annual worker trainings and told us how they ensured workers understood the existence of complaint mechanisms and how they could be used.

Hyatt and **Kempinski** said their hotels hold regular meetings between employees, human resources and management, but it was unclear how these ensured workers felt able to speak up if they experienced a problem or what process was followed if any issues were identified.

“ There is no clear structured and fair disciplinary process for a worker to be heard by management or any one in HR or talent office“

Kitchen helper from Kenya

Only three brands (**Accor**, **Hilton** and **IHG**) disclosed records of any grievances from workers during 2019 or 2020. Similar to disclosing supply chain data and supplier names, transparent information on grievances, including how they are remedied, is essential to demonstrating an effective mechanism is in place.



Response to COVID-19

3.9 average score | 15 max score

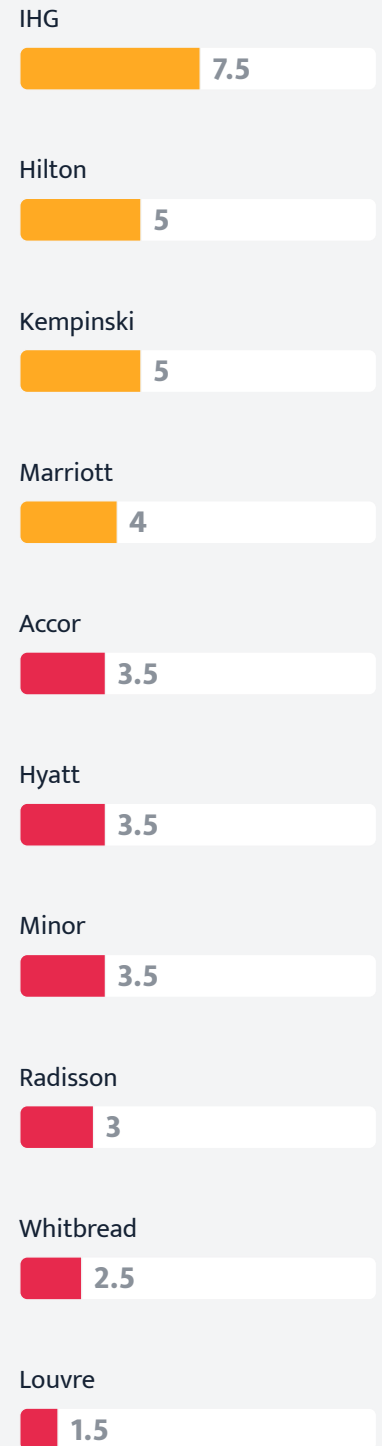
Redundancies

Most hotels provided some degree of transparency on how many workers were made redundant due to the pandemic. **Marriott**, **Radisson** and **Hyatt** acknowledged redundancies had been made, but did not provide any visibility on data. Only **IHG** provided transparent data on both the number and percentage of workers made redundant, both in its own workforce and that of its subcontractors.

Most brands stated all workers had received their entitlements under their contracts. Our interviews with workers largely confirmed those who had been made redundant in the sector were given their full dues under their contracts and labour law. However, it was clear from the brands' answers they did not have visibility on the packages provided to subcontracted workers; again, highlighting a clear issue with brands' monitoring of subcontractors.

Some brands also pointed to further financial support they had provided for workers. **Hilton** referenced a *"Team Member Assistance Fund to financially support team members and their families that were directly impacted by the virus."* **Hyatt** said it *"created the Hyatt Care Fund whereby hotel employees experiencing hardship, including loss of employment, as a result of COVID-19, were able to submit a request for financial assistance to be deposited into their account."* In neither case was it clear that subcontracted workers could be supported through the funds.

However, the Resource Centre is also aware of cases, verified by Migrant-Rights.org, which impacted workers made redundant during COVID-19 at two surveyed brands. In both instances the terminated workers were promised NOCs and QIDs to transfer sponsorship. One worker had already been offered a new job with a new employer when the hotel cancelled their ID and refused to issue NOC. In the other case the hotel belatedly applied for the worker's QID, leaving them in fear of becoming undocumented.



Protection against COVID-19

All hotels outlined changes made to accommodation to protect workers, such as increased cleaning, the use of informational posters, provision of hand sanitisers, shutting communal spaces and banning overnight guests. However, a handful of hotels indicated more substantive action.

Hilton, Hyatt, IHG and Radisson offered dedicated quarantine quarters to workers displaying symptoms of COVID-19 or who may have been exposed to a positive case. **Radisson** stated it reduced the number of workers sharing a room, although it did not reveal the number, while **Louvre** specified a maximum of two workers shared rooms.

Whitbread said when the rate of COVID-19 infections was high at the start of the pandemic, it moved workers *“from staff accommodation to our hotel and resided in individual hotel bedrooms to ensure they were in independent units with increased levels of social distancing.”* **Marriott** said individual rooms were provided to workers where possible. It was the only hotel to report engagement with all third party-providers of accommodation to ensure all subcontracted workers' accommodation was in line with direct employees' housing standards. Where third parties were not able to meet **Marriott** standards, they relocated subcontracted workers to **Marriott** staff accommodation.

We noted the positive action all responders took on this issue is closely intertwined with the financial success of the business: a number of hotels shared cleaning standards which appeared tailored to reassure guests of cleanliness standards, rather than prioritising worker safety. Having staff exposed to COVID-19 is bad for workers, but it is also bad for the bottom line of hotels who wish to avoid a reputation of not being COVID-19 safe or who may otherwise be forced to close.



Conclusion and recommendations

The FIFA 2022 World Cup is not just the most anticipated sporting event in the world, but one lauded for its ability to bring people and cultures together. Behind the scenes, workers in big name hotels play a huge role in the success of the event. Unfortunately, as our research shows, the reality for many migrant workers toiling in these brands is a far cry from the positive images presented of on glossy recruitment websites extolling company values.

Despite global policies referring to international human rights standards, our interviews reveal migrant workers in Qatar are suffering serious abuses. These include:

- ➔ Workers being trapped in jobs due to intimidation and fear of retaliation;
- ➔ Workers facing significant debt due to sky-high recruitment fees;
- ➔ Discriminatory wages, with position too often dependent on nationality;
- ➔ Terms of employment and treatment being significantly worse for subcontracted workers.

Furthermore, we found worker testimony often directly contradicts statements by brands. For example, no worker asked about the ease of changing jobs said they felt able to request a transfer, while brands told us the overwhelming number of requests were granted. Some brands even referred to the NOC, a requirement supposedly abolished by government reforms in 2020.

Responses by hotel brands reveal they trail other sectors in terms of transparency, with only a handful sharing their list of labour suppliers. No brand demonstrated meaningful due diligence of labour suppliers to monitor the conditions of its subcontracted workforce. Furthermore, some brands have seemingly failed to recognise they had any responsibilities to these workers at all, while others relied on the discredited social auditing approach. To address these issues, and better support and protect workers upon whose hard work the success of the event depends, hotel brands need to urgently revolutionise their approach to human rights due diligence in Qatar ahead of the World Cup. Our detailed recommendations are set out below.

Recommendations to hotel brands

- ➔ In line with the [UN Guiding Principles on Business & Human Rights \(UNGPs\)](#), put workers at the centre of a tailored due diligence monitoring process by:
 - ➔ Systematically and regularly interviewing subcontracted workers about their conditions with assurance of non-retaliation;
 - ➔ Consulting with migrant rights NGOs, civil society and diaspora organisations in the region and in key sending countries to understand risks to the workforce and subcontractors;
 - ➔ In the absence of workers being able to freely organise, establishing meaningful worker committees where workers, including subcontracted workers, are elected by peers and can bring issues to management's attention without fear of reprisal.

- ➔ Ensure workers' freedom of movement by:
 - ➔ Training workers, including subcontracted workers, on their rights under the new reforms that abolish the No-Objection Certificate;
 - ➔ Training all hotel management staff to ensure they understand that requests to move jobs must be accommodated;
 - ➔ Not imposing any additional administrative requirements on workers that want to leave the hotel or ones that are joining;
 - ➔ Interviewing subcontracted workers regularly to establish whether they can change jobs freely;
 - ➔ Prohibiting curfews in worker accommodation and explicitly committing to ensuring women are not subject to discriminatory measures regarding their freedom of movement.

- ➔ Address recruitment fees and related costs as per ILO guidance by:
 - ➔ Working collaboratively as an industry and with key stakeholders, including civil society and governments in sending countries, to establish a fair recruitment process in countries of origin that ensures workers will not pay recruitment fees;
 - ➔ Systematically carrying out interviews with workers at several points during the recruitment process and after appointment to establish if fees have been paid and requiring subcontractors to do the same;
 - ➔ Ensuring fees are reimbursed to workers and subcontracted workers by their employers and, if necessary, reimbursing workers directly where recruiters and suppliers are unable to in a reasonable time frame. Ensuring workers verify remediation.

- ➔ Increase transparency by publicly disclosing:
 - ➔ A complete list of the property owners, labour suppliers and recruitment agents they partner with both in Qatar and globally;
 - ➔ The number of grievances received disaggregated by issue and details of corrective actions taken;
 - ➔ The number of instances of recruitment fees uncovered in their operations and those in their subcontracted workforce, as well as the amount that has been reimbursed to workers.

- ➔ Develop time-bound, region-specific policies for the protection of migrant workers in consultation with workers and civil society, including migrant worker NGOs and trade unions.

- ➔ Ensure migrant workers are not discriminated against and that pay and position is not determined by nationality.

- ➔ Ensure the safety of women workers whether directly employed, or employed by a subcontractor or service provider, against gender-based violence and harassment by:
 - ➔ Undertaking a risk assessment of the properties and roles where women workers are at risk and developing risk mitigation plans to reduce risks, including exploring whether workers should be provided with panic buttons;
 - ➔ Systematically training all staff, particularly managers, to ensure they understand their responsibility to record instances, safeguard the complainant and provide all necessary support.



Business & Human Rights Resource Centre

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Business & Human Rights Resource Centre is an international NGO that tracks the human rights impacts of over 10,000 companies in over 180 countries, making information available on our 10-language website.

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- ➔ **Migrant-Rights.org**
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