



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

Building a legacy: laying the foundations
for lasting impact



MAKING WHAT'S GOOD FOR WORKERS
WORK FOR BUSINESS

February 2020

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Glossary of terms

Bulletin I

Revisions and additions to the WW Standards, published in February 2018.

BWI

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

Contractor

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

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

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

H&S

Health and safety

Joint Committees

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

Manpower agency

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

MOI

Ministry of Interior

MOADLSA

Ministry of Administrative Development, Labour and Social Affairs

Prescribed language

The WW Standards define prescribed

languages as "the languages of Arabic, Bengali, English, Tagalog, Hindi, Nepali, Tamil and Urdu".

Programme Welfare Forum (PWF)

Joint forum of the SC WWD and WWOs of main contractors to discuss priority issues and exchange best practice.

Project Workers' Welfare Forum (PWWF)

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

Project Workers' Welfare Officer (PWWO)

Representative of a main contractor in a PWWF

Qatar International Safety Centre (QISC)

Professional H&S training provider based in Qatar

Qatar Red Crescent (QRC)

The Qatari branch of the Red Crescent Society

Qatar Visa Centres (QVC)

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

SC

Supreme Committee for Delivery & Legacy

Sedex Members Ethical Trade Audit (SMETA)

Globally used format for social audits

Social and Economic Survey Research Institute (SESRI)

Academic research institute, part of Qatar University

Technical Cooperation Programme (TCP)

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

The SC's Universal Reimbursement Scheme (SCURS)

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

Weill Cornell Medicine – Qatar (WCM-Q)

Professional healthcare institute, part of Cornell University

Wage Protection System (WPS)

The WPS is a system launched in 2015 by MOADLSA that requires employers to pay employees' wages through bank accounts and to submit details of these payments to MOADLSA. The system is designed for

MOADLSA to check the timeliness and regularity of payments and phase out the payment of wages in cash.

WWD

Workers' Welfare Department

WWF

Workers' Welfare Forum (at accommodation sites)

WWO

Workers' Welfare Officer

WW Standards

Workers' Welfare Standards

Compliance terminology

Impactt's audits produce three types of finding:

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

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

- Critical: imminent risk to workers' safety or risk to life and limb, a significant breach of employees' human rights; a recurring major issue that has not been addressed, or an attempt to pervert the course of the audit.
- Major: a material breach of the SC WW Standards or Qatari law that is more considerable than a minor breach, with more serious implications.
- Minor: an occasional or isolated problem, an issue that represents low or limited risk to workers or those on site, or a policy issue or misunderstanding.

Impactt's auditors classify observations as follows:

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

Executive summary

This is Impactt's fourth Annual Report presenting the results of our independent external monitoring of the Supreme Committee for Delivery & Legacy (SC) Workers' Welfare Programme. The report sets out the findings of Impactt's audits and measures the SC's progress against the Roadmap set out in our 2017 report, and covers the 12-month period from January 2019.

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

The SC implements a four-tier auditing system against the WW Standards, comprised of contractors' self-audits (first party), comprehensive SC audits and inspections¹ (second party), external monitor audits (third party), and ad hoc inspections conducted by the Ministry of Administrative Development, Labour and Social Affairs (MOADLSA).² The SC's audit and inspection regime is complemented by joint health and safety inspections conducted by the SC and Building and Wood Workers' International (BWI). In addition, the SC carries out health, safety and security inspections on a revolving monthly plan.

Scope of Impactt's work

Contractors and tiers				Workers and main nationalities			
344 Total contractors on SC projects				32,136 Total workers on SC projects			
Main Contractors: 44	Report Sample: 22 contractors audited (7%)			Indian: 40%	Report Sample: Worker interviews 902 (3%) Worker satisfaction sample 532 (2%)		
Tier 1: 253		MC	T1 and T2	Bangladeshi: 27%	Indian: 23%	Bangladeshi: 33%	Nepali: 22%
Tier 2: 44	2020	6 (8%)	17 (6%)	Nepali: 22%	Other: 22%		
Tier 3: 3	2019	7 (18%)	16 (5%)	Other: 11%			
	2018	8 (35%)	11 (6%)				

Findings

The SC's efforts to implement its WW Standards among its contractors in this year have resulted in progress on reimbursement of recruitment fees, worker representation, annual air ticket allowance and provision of repatriation flights. The innovative SC Universal Reimbursement Scheme (SCURS) is widely implemented, and the SC calculates the total reimbursement by contractors to SC and non-SC workers could reach USD 30 million. This is paid across a payment period of up to 36 months.

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

² MOADLSA audits follow Qatari labour law rather than the WW Standards.

Further, the SC's rigorous monitoring and control system has resulted in Impactt identifying fewer priority areas – with the topics of 'worker representation', 'contracts and administration' and 'treatment' all improving in terms of fewer critical and major issues uncovered.

Impactt also notes an increase in worker satisfaction since our role began. This year, the highest levels of satisfaction we recorded related to safety (98%) and respect (95%). Overall, worker satisfaction has risen from 3.0 to 4.0 out of 5 in three years.

This work is taking place in the context of important changes in Qatari law, including the proposed abolition of the Kafala system³, the removal of exit permits for all workers⁴ and the adoption of a non-discriminatory minimum wage – the first of its kind in the region.⁵ In addition, the government established Qatar Visa Centres (QVCs) in key labour source countries in order to promote more streamlined and transparent recruitment processes.

Impactt's compliance audits revealed an average initial compliance rate across the 22 contractors audited of 69%. The average score increased to 82% at follow-up audit. This compares to an average initial score of 75%, and a follow-up score of 89% in the previous year. Contractors closed out or made progress on 63% of the issues identified. This is lower than last year (71%), but higher than 2018 (58%).

The year-on-year decrease in compliance scores and closure rates is attributable to the following factors:

- A sample that focused on a higher proportion of lower tier subcontractors (i.e. subcontractors over whom the SC has less direct influence) with less robust policies and practices. This is typical globally for subcontractors of this nature.
- Two subcontractors performed particularly poorly, with one contractor shutting down operations. These subcontractors did not make the necessary improvements, which resulted in the SC suspending business, classifying them under 'watch-list' and reporting them to MOADLSA.

The SC has also re-categorised some issues in line with its goals, increasing their severity, in relation to failure to repay recruitment fees for the full period, or provide medical counselling, for example.

The following section outlines key findings on priority topics:

- **Ethical recruitment⁶**

The Challenge: Impactt found issues related to ethical recruitment at all 22 contractors audited. These included a lack of robust processes both for checking whether workers had paid recruitment fees, and for verification of receipts and reimbursement.

³ https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_724052/lang-en/index.htm

⁴ <https://www.hrw.org/news/2020/01/20/qatar-end-abusive-exit-permits-most-migrant-workers>

⁵ <http://www.qatar-tribune.com/news-details/id/181917/shura-council-panel-okays-draft-law-on-minimum-wage>

⁶ In previous reports, this topic was formerly named 'Recruitment fees'

Progress: Impactt verified that 19 of 22 contractors were participating in SCURS this year. This goes beyond compliance, as contractors reimburse workers' recruitment fees without requiring proof. The SC should be commended for this ground-breaking initiative, which is delivering real remedy to workers. Those workers who receive this payment, and fully understand what it is for, report feeling 8-10% more satisfied than other workers, citing a sense of being more respected.

For the first three quarters of the year, 16 of 17 (94%) contractors were discontinuing SCURS payments once a worker stopped working at an SC site. Significant progress has been made since November 2019, when the SC and MOADLSA intervened to enforce ongoing participation in SCURS with a number of contractors. Impactt verified that 3 out of 4 contractors had rectified this issue by the time of the follow-up in quarter 4, meaning their workers would receive their full SCURS payments even after demobilisation from SC sites. This represented a three-fold increase in payments received by each of these workers.

The SC has taken strides to adopt a similar approach with all contractors. At the time of writing, 80 contractors had signed a commitment attested by MOADLSA to pay workers the full amount of SCURS even after demobilisation from SC sites. By encouraging the remaining companies to do the same and prompting all contractors to participate in SCURS, the SC estimates that the total value reimbursed to workers since the scheme was introduced could reach more than USD 30 million.

- **Wages and allowances**

The Challenge: Compliance in wages and allowances has remained high at 78%, but challenges remain in delayed payment of wages and the provision of accurate, complete payslips. The subcontractors concerned reported that delayed wage payments were due to late payments by their main contractors. Impactt found that resolving these non-compliances can improve workers' satisfaction by over 10%.

Progress: Wages have increased over the last three years due to the SC's initiatives. Since December 2018, the SC has required all of its contractors to adhere to the national temporary minimum wage of QAR 750 (USD 206) per month. Workers on SC projects are also eligible for a number of additional payments, such as reimbursements of recruitment fees via SCURS, and air ticket allowances for annual leave, totalling USD 61 per month.

- **Working hours**

The Challenge: Security contractors and construction contractors with a small security team were found to have low compliance scores, compared to contractors focusing purely on construction. 70% of major and critical non-compliances on excessive working hours, or lack of rest days this year were raised at contractors either specialising in security or with a security team. As the demand for security and hospitality services increases leading up to the Tournament, these non-compliances must be closely monitored and remediated.

Progress: Compliance scores increased in 2020 with follow-up audit scores increasing to an average of 80%, up from 75% in 2018 and 2017. At construction contractors, excessive working hours were less prevalent and mandatory rest days were provided more frequently than in previous years. Workers increasingly express a preference for

having free weekends and evenings, rather than working overtime. Workers reported that this is due to better accommodation standards, which enable them to enjoy their time away from work.

Conclusions and recommendations

We believe that the SC is poised to leave a lasting legacy in pioneering ethical recruitment practices and sustained worker welfare. The SC has made breakthroughs in delivering SCURS, and driven notable improvements on 'worker representation', 'contracts and administration' and 'treatment'. Building on this progress, the SC will be able to further address high priority topics. To support this endeavour, Impactt has begun trialling a pilot scheme to embed targeted training among contractors between initial and follow-up audit, in order to increase understanding and closure of key WW Standards issues and deliver lasting impact.

We have outlined a new three-pillar roadmap to support the SC in ensuring a positive legacy.

Pillar 1: Ensuring a positive legacy

It is imperative to introduce strict expectations of contractors in the hospitality and other service sectors ahead of, throughout and after the Tournament. The SC should support in assigning responsibility and designing new processes to safeguard its legacy as a proponent of worker welfare. This will help to deliver a Tournament that promotes a lasting respect for human and labour rights beyond the final whistle.

• Recommendations:

1. Prompt wider adoption of the WW Standards, the SC's practices and innovations across the State of Qatar. This includes the Hospitality Working Group and other areas under the International Labour Organization Technical Cooperation Programme.
2. Continue to develop and disseminate a white list of approved subcontractors within the SC programme and Qatar.

Pillar 2: Reinforcing ethical recruitment

Main contractors should be required to take full ownership of their subcontractors' recruitment processes and ensure that the mobilisation of subcontractors complies with ethical recruitment practices.

• Recommendations:

1. Tighten requirements on Ethical Recruitment. Contractors should provide evidence of end-to-end management of recruitment processes, including:
 - a. Risk assessment of agencies in selection processes and due diligence over their sourcing of labour through any sub-agencies.
 - b. Evidence of the realistic costs of recruitment in agreements with their agencies, supported by detailed breakdowns.
 - c. Capacity building programmes, with training for all staff (and agency partners) on new ethical recruitment policies.
 - d. Collaboration with QVCs and organisations in labour source countries.
2. Increase responsibilities of main contractors in carrying out due diligence of any potential subcontractors:

- a. Require main contractors to carry out regular, detailed checks of the above requirements among all subcontractors.
- b. Establish and communicate clear consequences for main contractors whose subcontractors continue to breach these requirements.

Pillar 3: Providing sustainable solutions to recurring problems

The issues highlighted as priority topics must be addressed in a sustainable manner, through increased emphasis on practical training, together with a tightening of enforcement efforts.

- **Recommendations:**

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



About the authors

Rosey Hurst

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

Federico Burlon

Federico joined Impactt in January 2016 and is currently Head of Delivery. He was previously a Responsible Sourcing Manager at Tesco Plc. He has a background in human rights and labour standards improvement. Federico has an MSc in Human Rights from the London School of Economics and a BA in Political Science from Macalester College.

Ben Bostock

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

Barbara Dirnberger

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

Manuel Silva

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

Introduction

Impactt's fourth Annual Report presents the results of our independent external monitoring of the Supreme Committee for Delivery & Legacy's (SC) Workers' Welfare Programme.

The SC is the body responsible for delivering the infrastructure and host country planning and operations required for the FIFA World Cup Qatar 2022™ (the Tournament) to create a lasting legacy for the Qatar and the world. 344 construction (and ancillary service) contractors and 32,136 workers⁷ fall under the remit of the SC.

The SC is committed to working with contractors to protect workers' health, wellbeing, safety and security, both by upholding its Workers' Welfare (WW) Standards⁸ and engaging in "beyond compliance" activities.

The SC implements a four-tier auditing system against the WW Standards, comprised of contractors' self-audits (first party), comprehensive SC audits and inspections⁹ (second party), external monitor audits (third party), and ad-hoc inspections conducted by the Ministry of Administrative Development, Labour and Social Affairs (MOADLSA).¹⁰ The SC's audit and inspection regime is complemented by joint health and safety inspections conducted by the SC and Building and Wood Workers' International (BWI). In addition, the SC carries out health, safety and security inspections on a revolving monthly plan.

This four-tier audit system delivers multiple levels of oversight and transparency on conditions for workers. 100% of main contractors and subcontractors are covered by second party audits on a quarterly basis. The results of joint inspections by the BWI alongside the SC are published annually.¹¹ The SC first appointed Impactt as external monitor in 2016.

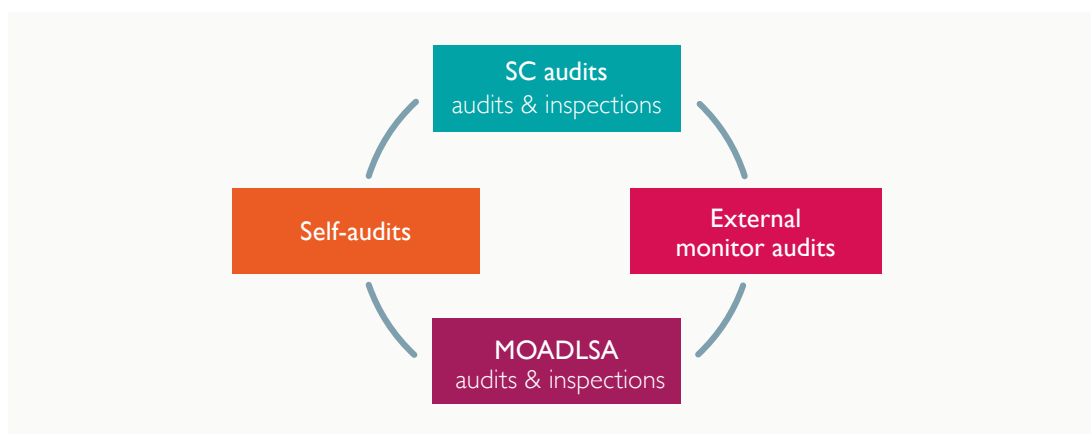


Figure 1: SC four-tier audit system

⁷ Data obtained from the SC, December 2019.

⁸ The WW Standards are a set of specific, contractual requirements outlining how workers should be treated. They were updated to edition 2 in 2016 and complemented by an addendum ('Bulletin 1') in 2018. (For ease of reference, 'WW Standards' will refer to WW Standards ed. 2 plus Bulletin 1).

⁹ Please refer to the SC Annual Progress Report for further details.

¹⁰ MOADLSA audits follow Qatari labour law rather than the WW Standards.

¹¹ All reports are available on the SC's website: <https://www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency>, accessed 14 January 2020.

Introduction to Impactt

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

Driven by a mission to make what works for workers work for business, Impactt harnesses the power of supply chains to drive positive change by developing win-win solutions that work for businesses and workers. Since 2006, Impactt has reached over 1.9 million workers.

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

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

The 2017 Annual Report

In our first annual report¹² (covering January 2016 – January 2017), Impactt recommended that the SC implement a three-year roadmap consisting of three pillars:

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

Pillar 2: Prompt behaviour change in manager-worker interaction.

Pillar 3: Collaborate for greater reach and impact.

The 2018 Annual Report

In the 2018 annual report¹³ (covering January 2017 – January 2018), Impactt reported that the SC had made good progress in the following areas:

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

¹² <https://impacttlimited.com/wp-content/uploads/2017/01/SC-Annual-Report-Issue-3.2.pdf>

¹³ <https://impacttlimited.com/wp-content/uploads/2018/03/SC-Annual-Report-2018-Issue-6.2-digital.pdf>

The 2019 Annual Report

In the 2019 annual report¹⁴ (covering January 2018 to January 2019), Impactt reported significant progress in:

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

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

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

- Drive increased compliance, focussing particularly on: recruitment fees – remediation and prevention; working hours; communication.

Pillar 2: Prompt behaviour change in manager-worker interaction

- Work with contractors to amplify workers' voices, publish statistics on the SC Grievance Hotline, enhance WWF training and build workers' skills.

Pillar 3: Collaborate for greater reach and impact

- Focus on collaborations with MOADLSA, SC-BWI-JWG, multi-stakeholder forums and international leadership groups.
- Implement and monitor upcoming regulatory changes.

The 2020 annual report

This annual report sets out Impactt's findings from audits conducted during the period January 2019 – January 2020. It also reports on roadmap progress, and makes recommendations for further refinements of the SC's programme with a new roadmap to deliver legacy outcomes.

¹⁴ <https://impacttlimited.com/wp-content/uploads/2019/04/SC-Annual-Report-2019-Issue-2-digital.pdf>

Context

The SC is a government entity tasked with leading Qatar's preparations for the 2022 FIFA World Cup, including the stadiums, infrastructure and legacy. As part of building a positive legacy, the SC requires construction companies to comply with its worker welfare standards. Over the past 12 months, SC projects employed more than 32,000 workers out of the estimated 800,000 migrant workers employed in construction in Qatar.

Challenges

The SC works in a demanding context:

- **A rapidly expanding workforce:** As of December 2019, there were 32,136 workers – which the SC believes will be the peak workforce - up from 27,500 in 2018, and 18,500 in December 2017. This increases demand on SC resources. Additionally, as the SC extends the scope of its compliance programme beyond measuring contractors' performance to supporting improvements, its resources are further stretched.
- **Short active period:** On average, subcontractors spend six months working on an SC project. This reflects the nature of the construction industry, whereby different stages in the construction process require different skills. Subcontractors therefore have limited time to adapt their operations to comply with the WW Standards, which set a higher standard than Qatari law in some areas. The SC also has limited opportunity to influence such contractors to continue with higher standards after they have left the project.
- **The introduction of a national non-discriminatory minimum wage** was announced in October 2019 – and a draft law was approved in January 2020¹⁵. In addition to benefitting migrant workers, this could have significant impacts for contractors whose contracts were determined before the wage was agreed. Impacts may be particularly severe for manpower agencies whose main revenue comes from the supply of workers.

Changes in national law

In 2019, the State of Qatar made a number of changes to national law:

- **Joint Labour Committees:** these act as a means of worker representation, and are specified in the WW Standards. The SC's WWF have served to inspire the creation of Joint Labour Committees. In April 2019, MOADLSA issued a decree regulating the procedures for the election of worker representatives to Joint Committees with their management. This paves the way for committees to form and start functioning across Qatar.
- **Kafala system:** From January 2020, foreign migrant workers who are subject to Qatari labour law no longer require their employer's permission to leave the country.
- **Minimum wage:** In October 2019, the government announced the introduction of a national non-discriminatory minimum wage from early 2020 that will replace the

¹⁵ In late January 2020, the Shura Council approved the draft law on fixing the minimum wages for workers: <https://www.qataroday.com/news/local/shura-council-panel-okays-draft-law-on-minimum-wage/69809>

temporary minimum wage introduced in 2017. The Shura Council has approved a draft law on fixing the minimum wages for workers as of January 2020¹⁶.

- **Visa Centres:** In 2018, the Government established visa centres in key labour source countries with the intention of making recruitment processes more streamlined and transparent. In 2019, new centres opened in Nepal and the Philippines. Impactt visited the QVC at the SC's request, and with the approval of the MOI and MOADLSA, and verified that it performs its intended functions.

Stakeholder views

Qatar's delivery of the Tournament continues to attract interest from a wide range of audiences, particularly in relation to human rights. Commentators note the country's steps forward in reforming the Kafala system¹⁷ and approving a new national non-discriminatory minimum wage.¹⁸

Additionally, stakeholders praised efforts by the SC to encourage contractors to repay workers recruitment fees^{19,20} and in developing WWF, which now provide further learnings for the Qatari Government.²¹

This year stakeholder commentary continued to centre on understanding the root causes of non-work related deaths.^{22,23} Passport retention was highlighted as an ongoing issue, despite fewer prosecutions in 2018 than in 2017.²⁴ The ongoing payment of recruitment fees for the majority of migrant workers²⁵ remains a key priority. FIFA's Human Rights Advisory Board also highlighted the need to effectively enforce the abolition of exit permits, which as of January 2020 have been abolished, as described above.²⁶

¹⁶ In late January 2020, the Shura Council approved the draft law on fixing the minimum wages for workers: <https://www.qatarday.com/news/local/shura-council-panel-okays-draft-law-on-minimum-wage/69809>

¹⁷ <https://www.amnesty.org/download/Documents/MDE2297832019ENGLISH.PDF>

¹⁸ <https://www.cnn.com/2019/10/17/qatar-approves-minimum-wage-law-scraps-worker-exit-permits.html>

¹⁹ See, for example <http://www.globalconstructionreview.com/news/qatar-pay-back-workers-recruitment-fees-5m-restora/>

²⁰ <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbm6wczrmw9rcr>

²¹ <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbm6wczrmw9rcr>

²² <https://www.theguardian.com/global-development/2019/oct/02/revealed-hundreds-of-migrant-workers-dying-of-heat-stress-in-qatar-each-year>

²³ <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbm6wczrmw9rcr>

²⁴ P391, <https://www.state.gov/wp-content/uploads/2019/06/2019-Trafficking-in-Persons-Report.pdf>

²⁵ <https://www.amnesty.org/download/Documents/MDE2297832019ENGLISH.PDF>

²⁶ <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbm6wczrmw9rcr>

Supreme Committee for Delivery & Legacy Workers' Welfare programme

Key programme milestones

Key milestones in the development of the SC Workers' Welfare Programme since 2016 are summarised in the timeline below (figure 2). For further details, please read the SC's full report, available on its website.²⁷

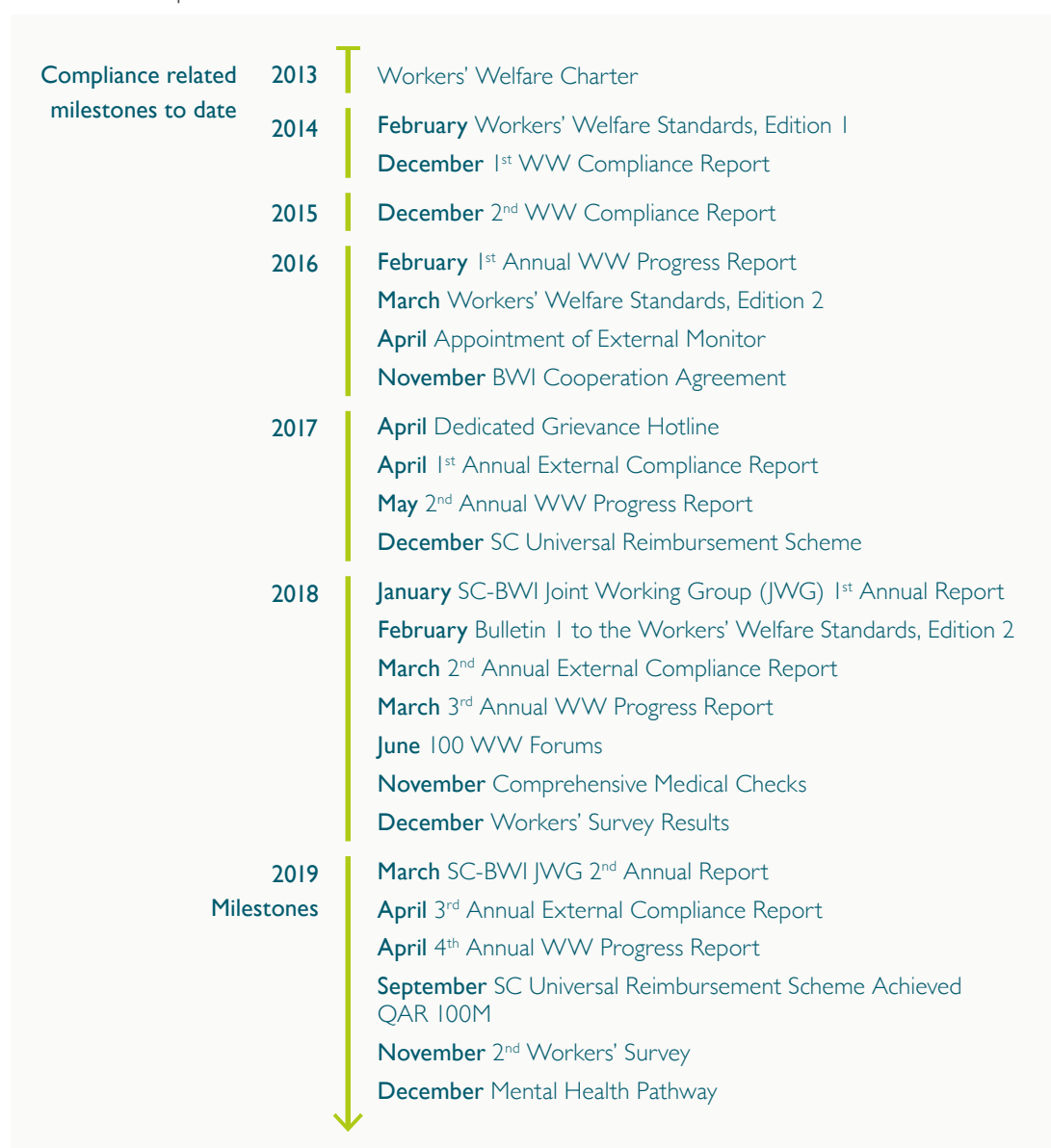


Figure 2: Timeline of the SC Workers' Welfare Programme's key milestones

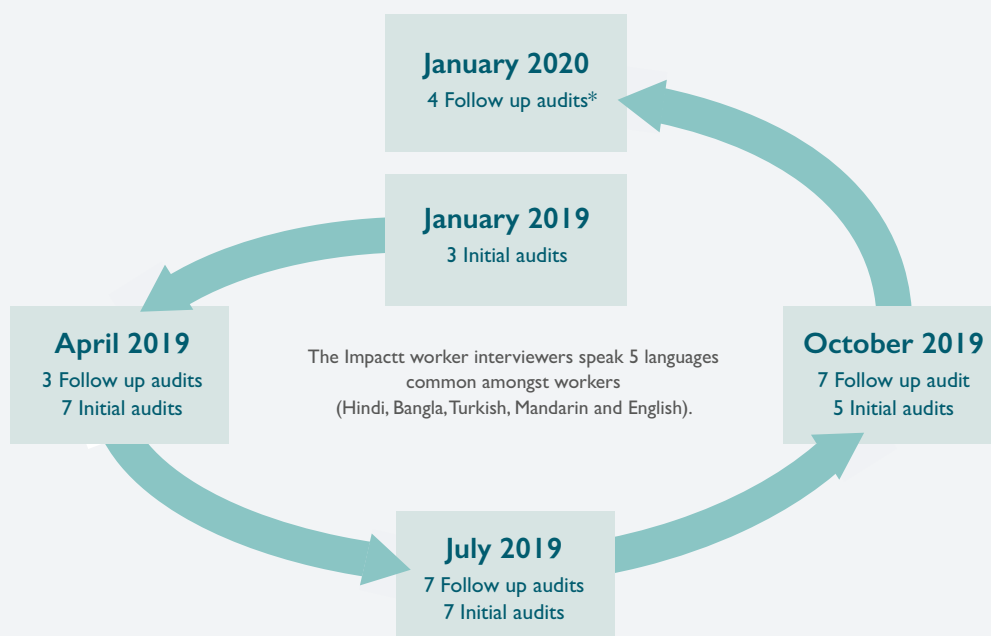
²⁷ <https://www.sc.qa/en/news/sc-releases-fourth-annual-workers-welfare-progress-report->

Impactt's External Compliance Monitoring Programme

	2017	2018	2019	2020
Contractors audited	10	14	24	23*
Worker interviews	253	679	1109	951*
Person days in the field	90	152	334	336

*This year one of the contractors is not included in the scope of the report.

Auditing activities in scope of the annual report 2020:



Contractors and tiers

344 Total contractors on SC projects

Main Contractors: 44	Report Sample: 22 contractors audited (7%)		
Tier 1: 253		MC	T1 and T2
Tier 2: 44	2020	6 (8%)	17 (6%)
Tier 3: 3	2019	7 (18%)	16 (5%)
	2018	8 (35%)	11 (6%)

Workers and main nationalities

32,136 Total workers on SC projects

Report Sample: Worker interviews 902 (3%) Worker satisfaction sample 532 (2%)		
Indian: 40%	Indian: 23%	Bangladeshi: 33%
Bangladeshi: 27%	Nepali: 22%	Nepali: 22%
Nepali: 22%	Other: 22%	
Other: 11%		

Findings

This section sets out the overall results of Impactt's assessment of 22²⁸ contractors during the period January 2019 – January 2020 and additional verification activities, together with the results of the worker satisfaction surveys. The glossary of terms (see page 3) contains descriptions of the compliance terminology used below.

Note on reporting years: Each reporting year is referred to via its Annual Report release year, as opposed to the calendar year in which the bulk of respective audits took place. For example '2019' refers to the reporting period of January 2018-January 2019, the results of which were released in the 2019 Annual Report.

Compliance Findings²⁹

Figure 3 summarises this year's average compliance scores by topic area. The findings are organised by audit section, following the worker journey. Each of these sections contains relevant requirements from the SC WW Standards, and Qatari law.³⁰

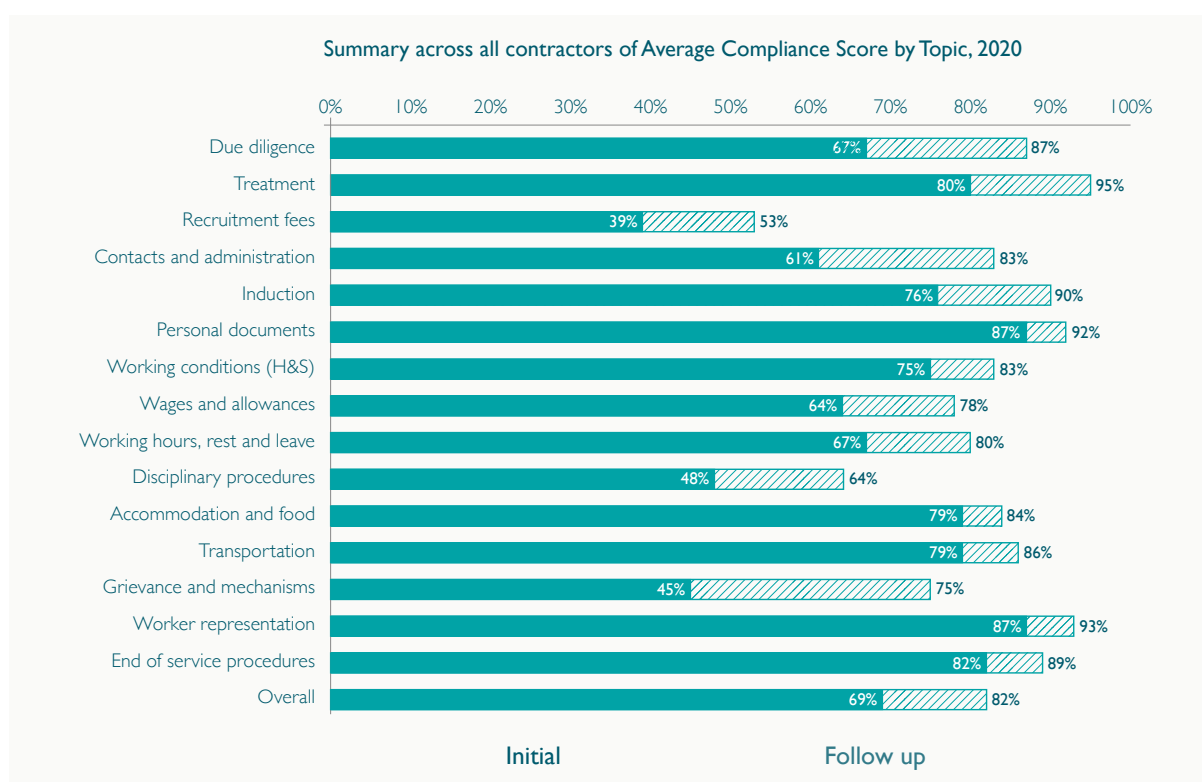


Figure 3 – Summary across all contractors of average compliance score by topic, 2020

²⁸ 2 fewer contractors were in scope for regular compliance audits, compared with last year. This was due to a reallocation of budget to conduct special investigations and worker interviews at 2 contractors with systemic critical issues, beyond our regular annual scope. Impactt's team also visited the Qatari Visa Centre in Dhaka, Bangladesh.

²⁹ As is the case year on year, it should be noted that some variation may have resulted from Impactt refining the compliance checks. This usually takes the form of either merging or splitting checks to facilitate clearer discussions with contractors on root causes and possible solutions.

³⁰ The scores are based on Impactt's own audit template, which contains key elements of the SC WW Standards and Labour Law – but does not check contractors exhaustively on all WW Standards requirements or all Qatari Law.

The average overall initial audit compliance rate across the 22 contractors audited this year was 69%. By the follow-up audit, the average score had increased to 82% overall. This compares to an overall average initial score of 75%, and a follow-up score of 89% in 2019.

Topics with a high average compliance score (76% and above) during initial audits were treatment, induction, personal documents, accommodation, transportation, worker representation and end of service. Average results for worker representation at initial audit have increased from 67% in 2018 to 87% this year.

Topics with low average initial compliance (50% and below) during initial audits were ethical recruitment, disciplinary procedures and grievance mechanisms. Average compliance scores on ethical recruitment had decreased from 52% in 2018 to 39% this year at initial audit.

The topics on which contractors had made the greatest progress on average were contracts and administration, disciplinary procedures and grievance mechanisms. Grievance mechanisms saw a 30% increase between initial and follow-up, and contracts and administration saw a 22% increase. Both topics have seen their follow-up compliance scores increase during the last three years (from 71% in 2018 to 75% this year for grievance mechanisms and from 73% to 83% for contracts and administration).

The topics on which contractors had made the least progress on average were personal documents, working conditions, accommodation and food and transport. Accommodation and food saw a 5% improvement between initial and follow-up, and working conditions an 8% improvement. Both topics have seen their follow-up compliance scores decrease during the last three years. In accommodation and food, follow-up scores had decreased from 89% in 2018 to 84% this year. Follow-up scores for working conditions had decreased from 88% in 2018, to 83% this year.

Contractors were able to close out or make progress on 63% of issues.³¹ This is lower than last year (71%), but higher than 2018 (58%). Where non-compliances were marked as 'progress made' during follow-up, in many cases, contractors had revised their policies and processes but not communicated changes to workers effectively. In 2020, 37 issues were marked as 'progress made' for this reason. This highlights an overall need for contractors to improve their communication channels with workers, and presents an opportunity for the SC to provide training on how this could be achieved.

³¹ This excludes issues that could not be verified or where the contractor was 'unable to show improvement' / 'unable to verify' due to factors outside their control (e.g. no new recruitment to demonstrate compliance on issuing offer letters). We considered non-compliances and observations raised during initial audits only; new issues raised during follow-up audits are excluded as Impactt does not carry out second follow-up audits to verify their status. This year we found 60 such issues.

Severity of issues

Impactt raises non compliances as 'minor', 'major' or 'critical' depending on the impact these have on workers as well as the number of workers affected. We saw an increase in the severity of issues raised this year, and a decrease in contractors' performance in resolving them. Contractors may be recorded as having a high rate of severe issues against certain topics, regardless of their overall compliance rate. The topics with the highest degree of severity³² this year were:

- Personal documents
- Ethical recruitment
- Wages and allowances
- Working hours.

	2018 Report		2019 Report		2020 Report	
	Issues raised (#)	Closed & progress made (%)	Issues raised (#)	Closed & progress made (%)	Issues raised (#)	Closed & progress made (%)
Critical NCs ³³	22	36%	18	100%	21	61%
Major NCs ³⁴	146	51%	269	74%	238	74%
Minor NCs ³⁵	415	62%	778	69%	714	56%
Total NCs	583	58%	1,065	70%	973	60%
Critical OBs	17	35%	17	88%	23	80%
Total OBs	150	57%	283	75%	180	74%
Total issues	733	57%	1,348	71%	1,178	63%
Total critical issues	39	36%	35	94%	33	72%

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

Table 1 – Overall follow-up improvement by year

³² The severity level is calculated using the proportion of critical and major non-compliances, and critical observations, relative to the total number of non-compliances. Severity relates to the level of risk to workers or the size of the gap between current practice and legal or WW Standards requirements.

³³ Imminent risk to workers' safety or risk to life and limb, a significant breach of employees' human rights; a recurring major issue that has not been addressed, or an attempt to pervert the course of the audit.

³⁴ A material breach of the SC WW Standards or Qatari law that is more considerable than a minor.

³⁵ An occasional or isolated problem, an issue that represents low or limited risk to workers or those on site, or a policy issue or misunderstanding.

The increase in prevalence of severe issues is largely due to the following reasons:

- The higher proportion of subcontractors audited³⁶ has meant a higher proportion of major and critical issues. Our increased focus on lower tiers is largely due to our monitoring having already encompassed the majority of main contractors. This year there was an average of 10 major and critical issues raised per main contractor compared with an average of over 13 for Tier 1 and Tier 2. This is in line with both 2018 and 2019, which also saw an average of fewer than 10 major and critical issues per main contractor, compared to almost 12 for Tier 1, and over 13 for Tier 2.
- Additionally, the SC has acted promptly by suspending trading with one Tier 1 and one tier 2³⁷ contractor; and put one subcontractor on a watch list this year due to lack of cooperation and consistent failure to pay workers' salaries. These two contractors alone were responsible for 81 non-compliances, of which 28 were critical or major.
- This sample includes more contractors with security functions where there were more major and critical issues at both main and subcontractors – compared with contractors with no security functions. Security guards have worked hours beyond the legal limit and longer periods without a rest day, more frequently than construction workers – Impactt and the SC note that this is common practice. This year excessive working hours were found at 10 contractors, of which 6 related specifically to security guards. Similarly, insufficient monthly rest days were found at 5 contractors, of which 4 related specifically to security guards.
- In line with key welfare objectives, the SC has upgraded the severity rating of some prevalent, newly recurring issues. For example:
 - Upgraded to critical: continuing to reimburse recruitment fees via the SC Universal Reimbursement Scheme (SCURS),³⁸ even after workers leave SC sites (all but 1 contractor was failing to do this at the initial audit).³⁹ This had an immediate impact on the reimbursement amounts received by workers (see findings section on Ethical Recruitment).
 - Upgraded to major: providing medical counselling to workers (18 of 22 contractors audited were non-compliant at initial audit).

³⁶ 74% of contractors audited this year were Tier 1 or below, compared with 70% in the 2019 report, and 58% in the 2018 report

³⁷ The SC suspended trading with the tier 2 contractor before a follow-up audit could take place. The 'issues raised' and 'closed and progress made' columns in table 1 exclude this contractor.

³⁸ The Supreme Committee's Universal Reimbursement Scheme (SCURS) aims to reimburse workers who have paid recruitment fees, without the need for receipts. Please see the 'Ethical recruitment' sub-section for further details.

³⁹ As SCURS is not itself a WW Standards requirement, we do not classify issues in its application as 'non-compliances', classifying them instead as 'observations'.

Satisfaction

Nevertheless, looking beyond compliance, we have seen overall worker satisfaction increase from 3.0 to 4.0 out of 5 over the last three years. This has been largely due to increased satisfaction on safety and respect, which has increased by over 33%. In contrast, satisfaction with income and progression has decreased by 13%.



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

Workers highlighted the following as most important in overall job satisfaction:

- **Additional allowances and overtime premiums**, including receiving allowances such as SCURS payments and an airfare allowance.⁴⁰
- **Improved work-life balance:** Workers are now increasingly pleased to have time off work, compared to 2017, which many workers say is due to improved accommodation and access to more leisure facilities.
- **Workers are increasingly feeling respected and safe.** This strongly reflects increases in compliance on treatment, and worker representation.
- **Working on an SC project:** Workers who had previously worked on non-SC projects highlighted their comparative satisfaction on SC projects, due to higher pay, better accommodation and more financial entitlements.

⁴⁰ Workers who work on SC projects are entitled to the costs of flying home once per year rather than every second year as per Qatari law. As many SC projects are short term in order to ensure workers receive a fair portion of this entitlement, many contractors opt to pay a monthly airfare allowance.

Malkit⁴¹ has worked in various projects but he likes his current job on an SC site the most. This is because of the good safety practices, the behaviour of site staff, the lack of unreasonable pressure at work, the respect he feels from everyone, the limited overtime, and for the additional USD55 (SCURS + Airfare allowance) he is receiving every month.



⁴¹ Pen portraits are small stories provided by workers. Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

Severity and prevalence by topic area

Compared to last year, there are a smaller number of priority topics, with five selected based on analysis of severity⁴² and prevalence.⁴³ However, there are more severe issues across these priority topics. These are highlighted in the graph below (Figure 5). Some topics have seen overall improvements in severity and prevalence, for example:

- Worker representation
- Contracts and administration
- Accommodation and food
- Treatment
- End of service procedures.

We found that the increase in severity in the high priority topics was most apparent at Tier 1 and Tier 2 subcontractors. Within this year's sample, there was a higher proportion of audited subcontractors at these levels.

Please see detailed findings for all priority topics in the next sub-section, and a summary table for non-priority topics in the following sub-section.

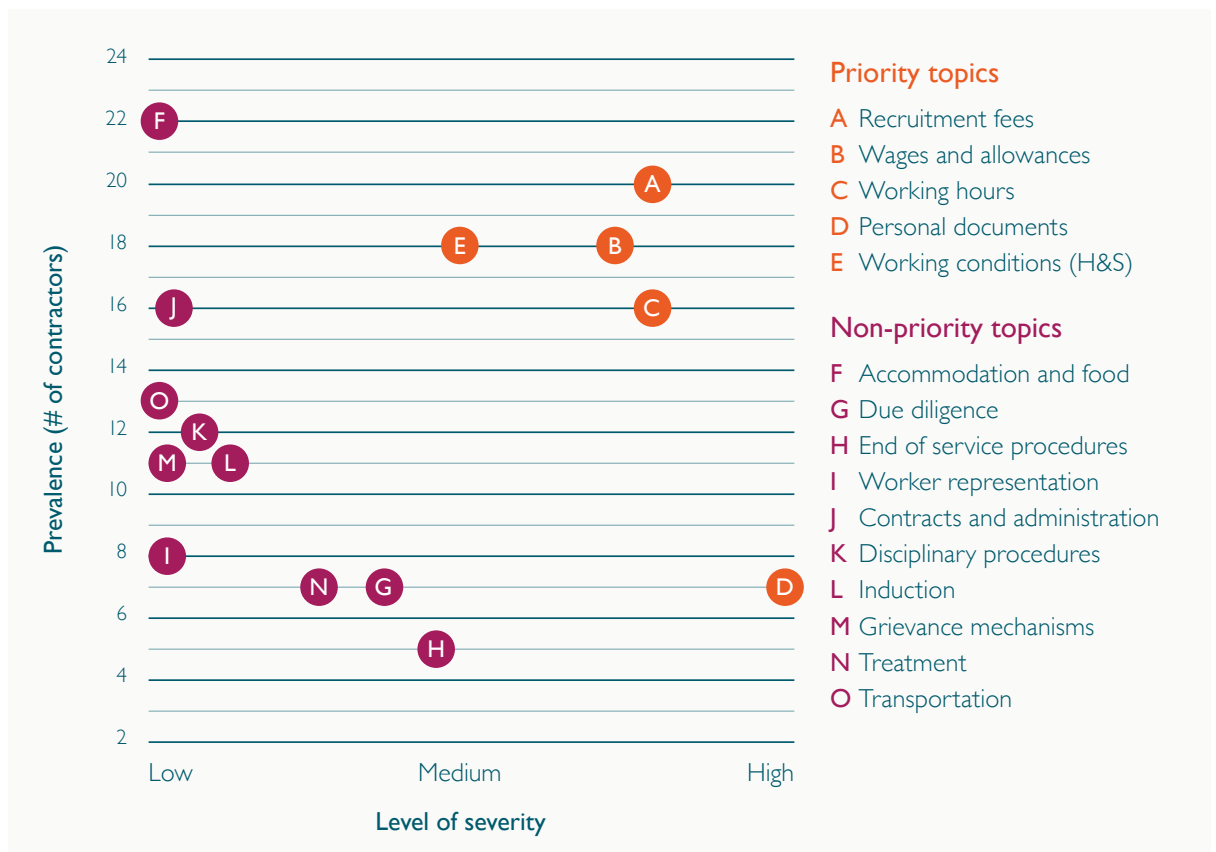


Figure 5 – Priority topics

⁴² The severity level is calculated using the proportion of critical and major non-compliances as well as critical observations, relative to the total number of non-compliances. Issues that were closed at follow-up are omitted. Severity relates to the level of risk to workers or the size of the gap between current practice and legal or WW Standards requirements.

⁴³ Prevalence refers to the number of contractors identified as having an issue in a particular topic area.

A. Ethical Recruitment⁴⁴

WW Standards requirements

The WW Standards requires contractors to:

- Reimburse workers for recruitment or processing fees if the worker is able to provide proof that they have paid such fees (WW Standards 6.9).
- Pay all recruitment and processing fees, and include this as a clause in their contracts with recruitment agents (WW Standards 6.4).
- Obtain a signed statement from the Recruitment Agent immediately after the placement of Workers by a Recruitment Agent, stating that the Recruitment Agent has complied with the requirements of WW Standards 6.4 (WW Standards 6.6).
- Complete a new starter checklist with new workers, covering whether they paid any recruitment fees (WW Standards 6.10).



Figure 6 – Ethical Recruitment: Compliance

Enabling zero cost recruitment of migrant workers – alongside the reimbursement of recruitment fees already paid – remains the greatest challenges facing organisations seeking to ensure ethical recruitment of migrant workers across the globe. The SC's WW Standards aim to tackle both challenges from a compliance perspective. Going

⁴⁴ This topic was formerly entitled 'Recruitment Fees' in previous reports. It has been renamed to reflect the wider mandate which is covered within this topic.

beyond compliance requirements, last year's annual report highlighted the SC's Universal Reimbursement Scheme (SCURS), which encourages contractors to provide reimbursement for workers who had paid recruitment fees even without proof of payment. This is of great importance since, this year, 94% of the workers who reported having paid recruitment fees had no receipts.

Compliance findings

Ethical recruitment remains a global challenge and is unsurprisingly still an ongoing priority topic in terms of compliance results at initial audit, with results declining year on year. Impactt found issues related to ethical recruitment at all 22 of the contractors audited at this initial stage, with an overall increase in the severity of issues found. This was largely due to the higher proportion of Tier 1 and 2 subcontractors audited with less robust policies and practices in place. Despite this, Impactt found that 19 of 22 of these contractors were participating in SCURS and reimbursing workers without proof of payment.

Impactt identified the following non-compliances:

- 11 of 22 contractors did not have robust processes to check whether workers had paid recruitment fees. Six contractors subsequently asked their workers in an appropriate manner whether they had paid fees. The remaining contractors took either limited or no action.
- 19 of 22 contractors did not have robust processes for verification of receipts and reimbursement.
 - 6 of 19 addressed the issue by creating a robust process.
 - A further 7 of 19 created a process but did not communicate it effectively to workers.
 - The remaining 6 made no progress.
- Impactt identified 7 workers across 3 contractors who had receipts for recruitment fees. All of these contractors were verified to be participating in SCURS, paying a total higher than the value of these receipts. In instances where the proof of payment is higher than the total value of SCURS payments received, the SC requires contractors to investigate and repay workers the higher amount. However - as we did not find an instance of this kind during the year, we were unable to verify any such cases.

Recruitment fees analysis

The proportion of workers recently recruited to SC projects who report paying fees has decreased steadily between 2018 and 2020. We spoke to 399 workers this year who had been recruited since 2018, of which 280 (71%) reported paying recruitment fees, down from 83% last year and 96% the previous year. Of these workers, just 6% reported having some proof of payment.

In contrast, the average amount these workers report having paid has steadily increased each year, from USD 1,248 in 2018, up to USD 1,569 this year, as shown in Figure 7. While the higher amounts reported are partially due to a larger proportion of Bangladeshi workers - who tend to pay higher amounts in general - this is not the only driver. On average, workers recruited from Nepal reported 39% higher fees than last year, whilst Indian workers reported a 7% increase.

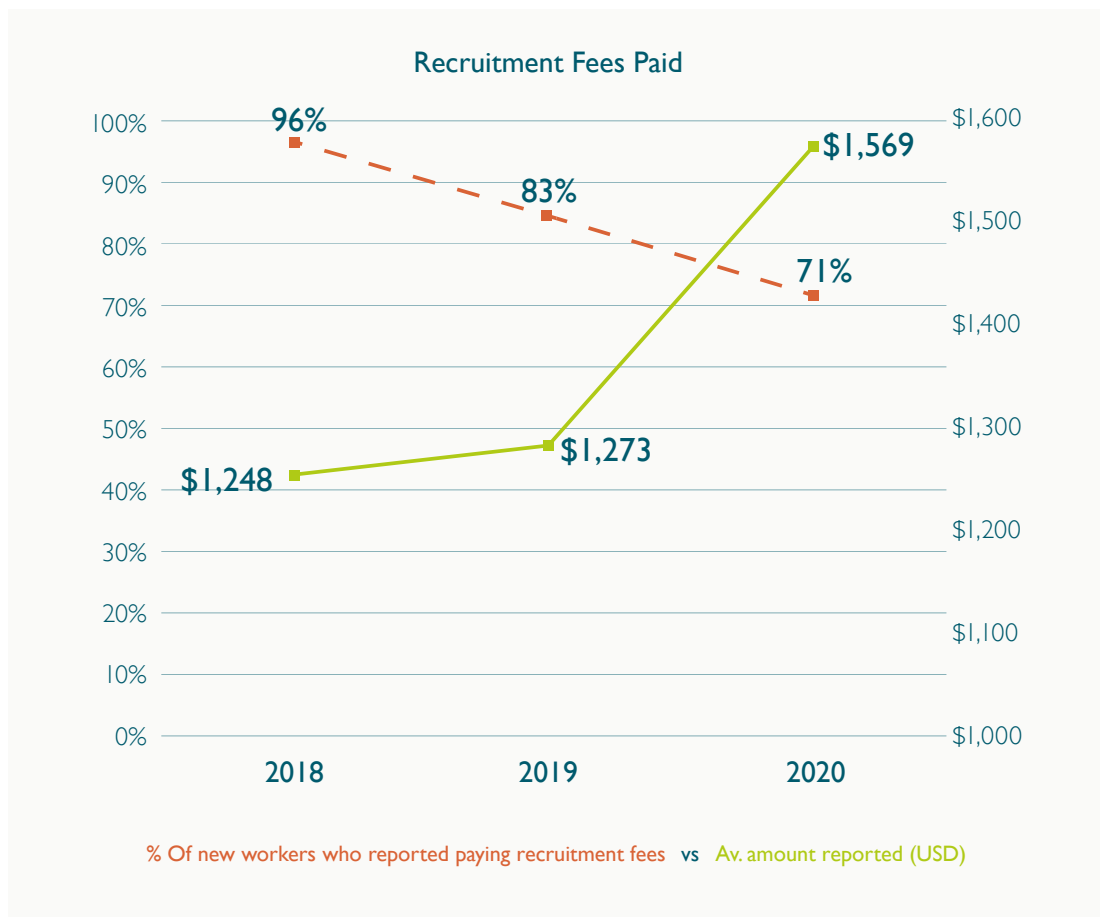


Figure 7 – Recruitment fees – overall percentage of workers reporting payment vs average amount paid

The below graph shows the average amount of fees reported by each nationality, as well as the percentage of workers from each nationality reporting paying any kind of recruitment fees. Both of these trends in Figure 8 are partly explained by the following:

- 2 contractors this year hired predominantly Turkish workers. Workers from Turkey report paying fees the least often (31%), and any fees paid are comparatively small (a maximum of USD 23).
- Contractors employing security personnel source comparatively more workers from Sierra Leone, Uganda, Kenya and Ethiopia, where a lower percentage of workers report paying fees (42%). However, those who do report paying fees declare relatively high amounts (average USD 1,002).
- Impactt's in-country research shows that all workers from Bangladesh and Nepal pay recruitment fees. Despite this, the percentage of workers from these countries reporting paying fees is only around 85%. This is likely due to worker coaching, whereby agents, supervisors, or employers convince workers not to tell the truth during audits.

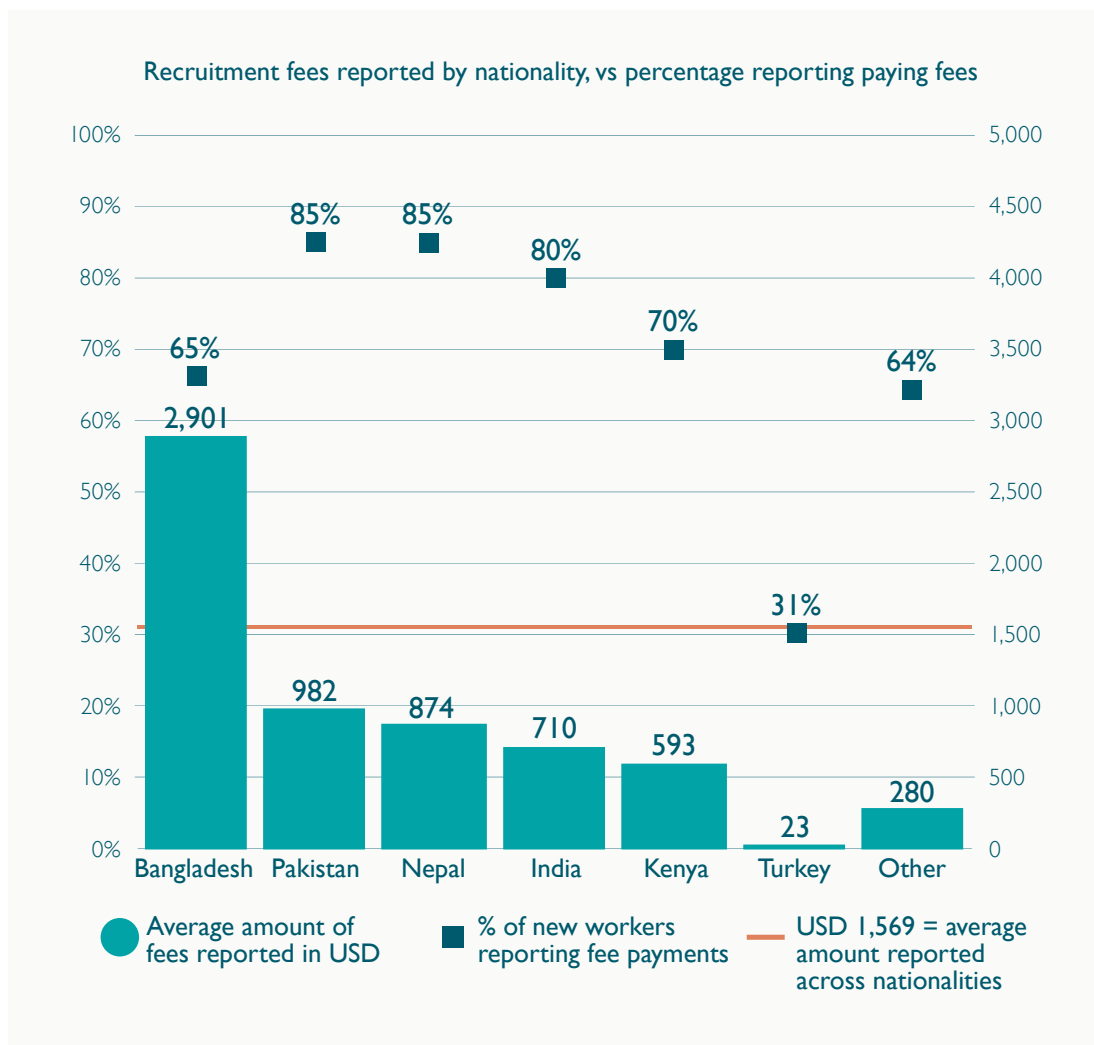


Figure 8 – Recruitment fees reported by nationality vs percentage reporting paying fees

Sanjib⁴⁵ paid USD 3,900 to a recruitment sub-agent for his airfare, visa, agent fees and medical fees. To pay for this, he took out loans from different sources. He was loaned USD 700 by a relative and USD 1,800 by a lender (of which USD 600 is interest). He also raised USD 1,400 by selling land. He has still not managed to reimburse the lender.

Reinforcing SCURS

Impactt audited 22 contractors this year, of which 19 were participating in SCURS. Only 29% of workers receiving SCURS payments at these contractors reported that they had understood that these payments represented a reimbursement of fees. These workers were 8-10% more satisfied with their jobs than other workers, reporting that they felt more respected.

⁴⁵ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

Impactt identified the following notable progress made in light of critical observations:

- For the first three quarters of the year, 16 of 17 (94%) contractors were discontinuing SCURS payments once a worker stopped working at an SC site. Workers at such contractors receive six monthly payments on average, before moving to non-SC projects.
- Since November 2019, the SC has intervened strongly to encourage ongoing participation in SCURS with a number of contractors. Impactt verified that 3 out of 4 contractors had rectified this issue by follow-up in quarter 4, meaning their workers would receive their full SCURS payments. At the fourth contractor, we were unable to verify this since no workers had been demobilised since the introduction of SCURS.

The SC is preparing to take a similar approach with all contractors. At the time of writing, 80 contractors had signed a commitment attested by MOADLSA to provide workers with their full SCURS payments, even after demobilisation from SC sites. If this is achieved, alongside encouraging all contractors to participate in SCURS, the SC estimates that the total collective value of reimbursed fees could reach more than USD 30 million.

Figure 9 illustrates the average impact on each worker from our 2020 sample – before and after – the implementation of these MOADLSA-attested agreements, indicating a nearly three-fold increase. According to the SC, the average commitment for the three-year period is USD 665.

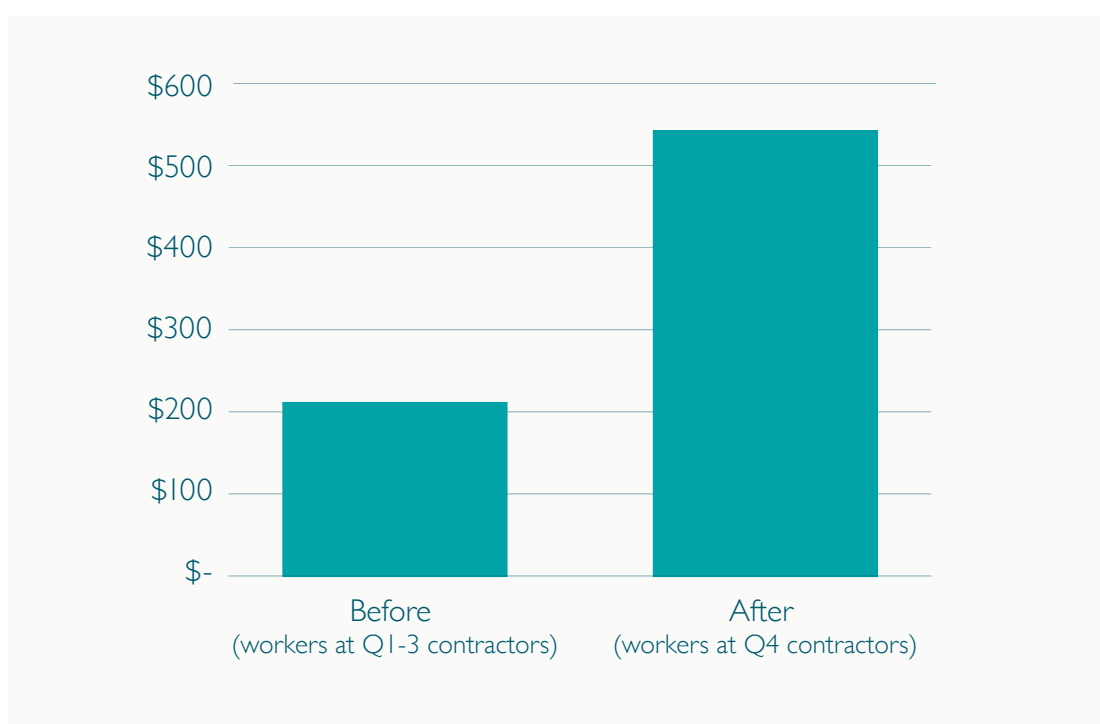


Figure 9 – Average projected SCURS amount to be received by a worker before vs after SC intervention

Reinforcing recruitment systems

The SC has concentrated on efforts to provide direct financial remediation to workers who have already paid recruitment fees. When we consider newer workers, while the percentage of workers reporting having paid fees is decreasing, it remains high at 71%.

With a view to preventing recruitment fees being paid and in compliance with Qatar Labour Law – the SC requires contractors to use only MOADLSA-approved recruitment agencies, establishing contracts with ethical recruitment clauses. At follow-up audit stage, 20 of 22 contractors were using approved agencies to recruit workers, with the remaining 2 in contracting stages with new, approved agencies.

The SC also requires contractors to obtain signed statements from these agencies confirming that a number of ethical recruitment practices have been followed, after any placement of workers. At follow-up audit stage, 19 of 22 contractors had obtained such statements. Despite this, all of these contractors were employing workers who had paid recruitment fees – meaning that either unknown subagents, or the agencies themselves, had not adhered to the required ethical practices outlined in these statements.

Tackling issues in labour source countries

Governance of the recruitment process in labour source countries is weak, which has helped create an environment where multiple actors charge workers for recruitment all the way from their home villages to their destination.⁴⁶ Impactt recognises the positive effort of the government of Qatar in introducing 14 Qatar Visa Centres⁴⁷ (QVCs) in six labour source countries over the past two years. By acting as a 'one-stop-shop' for recruitment services, these intend to remove a number of opportunities for exploitative fees to be charged. As requested by the SC, Impactt visited the QVC in Dhaka in January 2020, and verified that data registration, biometrics, medical examinations and contract signing services were being conducted for all candidates headed to Qatar.

⁴⁶ See Appendix 4 for further detail

⁴⁷ <https://www.qatarvisacenter.com/>

B. Wages and allowances

WW Standards requirements

O Qatar Labour Law and the WW Standards require contractors to:

- Pay overtime on a regular working day at a premium rate (Article 74).
- Pay workers on a rest day at a premium rate and provide a compensatory day off (Article 75).
- Provide workers with return air travel expenses to the nearest international airport within workers' home country. (WW Standards 9.7).
- Provide workers with payslips that contain prescribed key content (WW Standards 10.4).
- Pay workers in accordance with the WPS.
- Provide workers with free food, accommodation, transportation and healthcare.

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

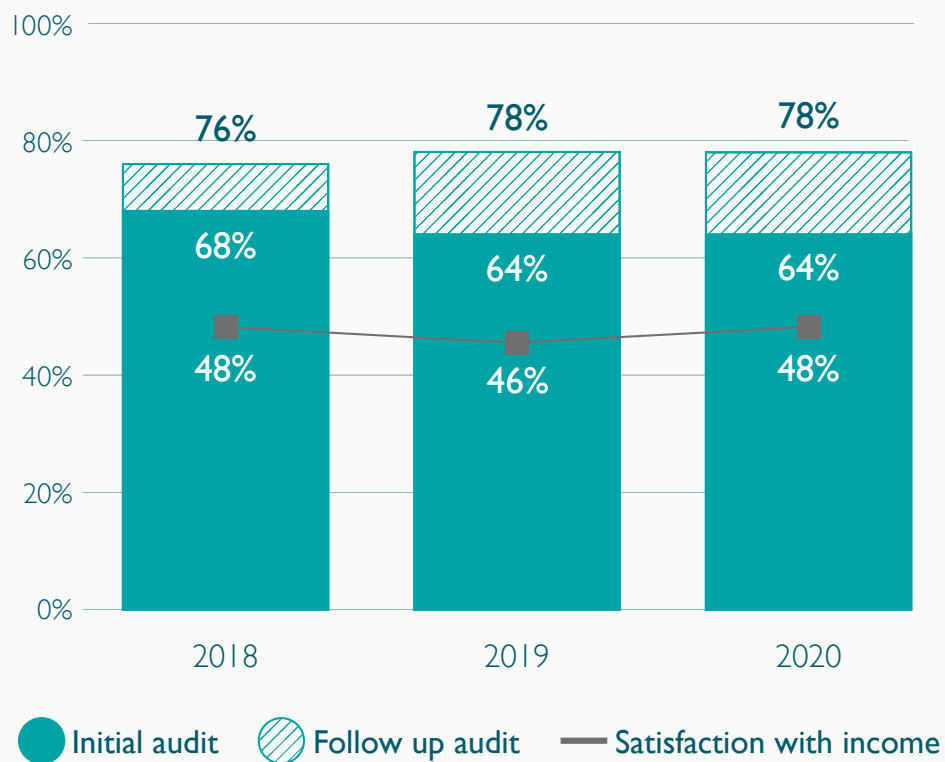


Figure 10 – Wages and allowances: Compliance vs satisfaction with income

Compliance in wages and allowances has remained high at 78%. Workers' satisfaction with income has also remained static at 48%.

Since December 2018, the SC has required all of its contractors to adhere to the national temporary minimum wage of QAR 750 (USD 206) per month. Workers on SC projects are also eligible⁴⁸ for a number of additional monthly payments, such as SCURS payments, and air ticket allowances, which together total USD 61 per month on average – though are not yet paid by all contractors.⁴⁹

Table 2 compares the average pay of a minimum wage worker on an SC project (before overtime and bonuses), year on year.⁵⁰

SC Base Monthly Pay (USD)				
	Lowest basic wage	Air ticket (average)	SCURS (average)	Total
2018	\$162	\$ -	\$ -	\$162
2019	\$162	\$28	\$23	\$213
2020	\$206*	\$32	\$21	\$259

* Conversion from QAR to USD correct as at January 2020.

Table 2 – Average base monthly pay of SC workers

We anticipate significant change over the coming year, with the implementation of the national non-discriminatory minimum wage expected in early 2020. This will bring significant benefit to workers, but will also place contractors under commercial pressure, since current contract terms are unlikely to be modified to reflect the new wage.

While pay levels at SC projects have increased in recent years, issues remain in terms of delays in payment of wages and provision of payslips. Closing these non-compliances can lead directly to increases in worker satisfaction. Impactt's worker satisfaction survey found that:

- Workers who receive payslips and understand how they are paid are 10% more likely to feel that they are able to cover their family's basic needs. Receiving payslips and understanding how pay is calculated increases predictability of income and allows for better financial planning. One worker reported: "I am happy to now receive payslips and know the details of how my pay is calculated. Now I can better plan my family's spending."
- Workers at contractors that paid wages on time were 11% more likely to feel able to cover both their own and their family's basic needs.
- Satisfaction with pay is also directly linked with higher quality accommodation, which

48 Whilst the majority of contractors paid these extra amounts, 1 of 22 contractors audited was not paying the air ticket allowance but managed to close the issue at follow up. 5 of 22 contractors audited were not paying SCURS to their employees.

49 These monthly payments (USD34 for air ticket allowances and USD27 for SCURS payments) are therefore multiplied by the proportion within our annual sample that are paying each allowance. The calculations exclude non-wage benefits that workers receive, such as food (estimated at a value of QAR 300-400 per month), transport to work (estimated at a value of QAR 100-200 per month), and accommodation, laundry and medical services (estimated at QAR 900-1200 per month). At the time of writing, the SC reports that 287 contractors were providing these air ticket payments and 225 were participating in SCURS.

50 Our audit scope does not include non-SC workers, however, each contractor we visit has a certain number of both SC and non-SC workers and we compare basic wages and allowances paid to each.

provides more free facilities to workers. Where food, laundry services and wireless internet access were provided in line with the WVV Standards, there was a 16% increase in workers reporting that they could cover their families' basic needs.

Since his father died when he was a teenager, Ngetich⁵¹ from Kenya has been the sole earner for his four younger siblings and his mother. He worked at a non-SC construction site and spent USD 100 per month on food, detergent and mobile data. Now he lives at an SC-approved accommodation site where he has free food, laundry and wireless internet access. Family is the most important thing in life for Ngetich, and now he can speak to them online as often as he likes.

Compliance findings

Impactt found issues at 5 contractors concerning delayed wage payments:

- 2 sub-contractors (a Tier 1 and a Tier 2 contractor) were found to have delayed salary payments by two or more months on multiple occasions. Both of these subcontractors reported that delayed wage payments were due to late payments by their main contractors. The SC has suspended trading with both sub-contractors due to these and other ongoing critical issues.
- In these extreme cases, the SC has been able to use its influence to encourage the main contractors to take ownership to help resolve issues with subcontractors – by providing direct salary payments to workers. At one contractor, Impactt verified that workers were paid the remainder of their salaries, before either being remobilised to other contractors, or being repatriated. At the other contractor, the SC confirmed that one month's salary was still delayed, as of mid-January 2020.
- 2 contractors were delaying the payment of workers' overtime. Both contractors were able to close this issue at the follow-up audit, as systems had been updated to pay workers on time.
- 1 contractor failed to provide authority to pay salaries to anyone other than the Managing Director, meaning salaries were delayed whenever he went on holiday. This finding remains open.

Impactt found issues at 10 contractors related to pay slips:

- 6 contractors did not issue payslips to workers. Two contractors were able to close this issue as all workers were receiving payslips with the correct information. Progress was made at the other two as payslips were drafted but not all workers had received these.
- 4 contractors provided inaccurate or unclear information on payslips. Only one of these contractors was able to close this issue by the time of the follow-up audit, as all workers showed proof of corrected payslips.

Impactt made a critical observation at one contractor related to deadline pressure and undocumented payments:

⁵¹ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

- One contractor failed to provide accurate payment records during the initial audit. The contractor said that it was facing deadline pressure at the completion of one stadium and was incentivising workers with target-based bonuses paid in cash, which were undocumented on timesheets and payroll. We did not find evidence to suggest workers had been working excessive overtime. However, these processes could have enabled this kind of situation to occur. During follow-up, Impactt verified that a productivity bonus is now documented on the payroll, showing the correct number of working hours, and is paid via WPS. All workers confirmed this, and the finding was closed.



C. Working hours, rest and leave

WW Standards requirements

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

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

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

- Eid Al-Fitr: 3 days; Eid Al-Adha: 3 days; Independence day: 1 day; holidays specified by employer: 3 days.

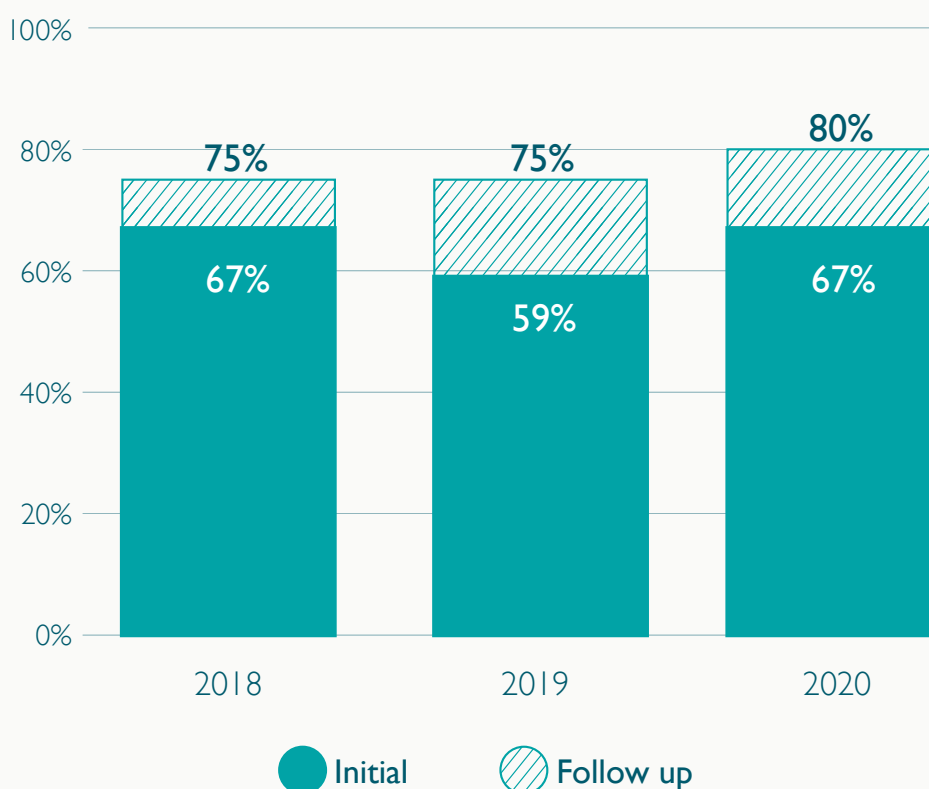


Figure 11 – Working hours: Compliance

Compliance scores have increased in 2020, with follow-up audit scores increasing to an average of 80%, up from 75% in 2018 and 2019. This is particularly commendable in light of the pressures facing contractors, as completion dates draw nearer.

Our worker interviews revealed that workers increasingly express a preference for having weekends and evenings off, rather than working overtime. Workers reported that this is due to better accommodation standards, which enable them to enjoy their time off work. In general, construction workers work within the daily time limits set out in the WVV Standards.

Security contractors and construction contractors with an auxiliary security function show a different trend. This year, we audited a greater proportion of such contractors than in previous years, and these contractors demonstrated lower compliance with working hours requirements than standard construction contractors. Many contractors commented that they were short-staffed in these areas, leading to longer working hours. As the demand for security and hospitality services increases, leading up to the Tournament, these non-compliances must be closely monitored and remediated.

Solomon⁵² has been working with his security company for one year. Including travel time, he often spends 16 hours a day on work related matters. He tends to sleep only 4-5 hours per night, which he doesn't feel is enough.

Compliance findings

Impactt raised issues at the following contractors related to either excessive hours worked, or lack of rest days. The majority of these issues related to security guards.⁵³

- Workers at 10 contractors worked excessive working hours.
 - At 6 of these, the issue related to security guards.
 - 6 of the 10 cases occurred during Ramadan, when the maximum daily hours are more strictly limited.
 - At one company, 2 workers each worked shifts of 25 consecutive hours. Due to the severity of this and other issues, the SC terminated its business relationship with this company.
 - 3 of the 10 contractors were able to close these issues, as we observed evidence of corrected management systems, and no ongoing non-compliances at follow-up.
- Workers at 4 contractors did not receive sufficient rest days. Only 1 of these cases was related to a construction worker; the rest were security guards. Security guards at 1 contractor worked 92 consecutive days without a rest day.
 - 1 contractor was able to close off the non-compliance, as we observed evidence of corrected management systems, and no ongoing non-compliance at follow-up.

⁵² Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

⁵³ Security guards refers to both workers at security contractors, and workers in a security role at a construction contractor.

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

- 9 contractors did not give their workers their full public holiday entitlements. 3 were able to close these issues at follow-up, as we saw evidence of new policies as well as worker understanding of their new entitlements.
- 2 contractors did not pay workers in advance when workers took annual leave.⁵⁴ One contractor was able to close this issue, and the SC suspended operations with the other, and reported them to MOADLSA, before a follow-up audit could take place.
- 1 contractor was charging workers holiday deposits. Workers had to deposit a payment with the employer before a holiday, which they could only collect on their return. This contractor was able to close this issue at follow-up, as we observed evidence of new policies, and noted workers' understanding of these.
- 1 contractor restricted workers from taking annual leave, citing business-critical cash flow issues. This issue was still open at follow-up, and the SC has suspended its business relationship with this contractor.

⁵⁴ This is a component of the WW Standards designed to ensure that workers have sufficient funds to enjoy their annual leave.

D. Personal documents

WW Standards requirement

The WW Standards require contractors to:

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

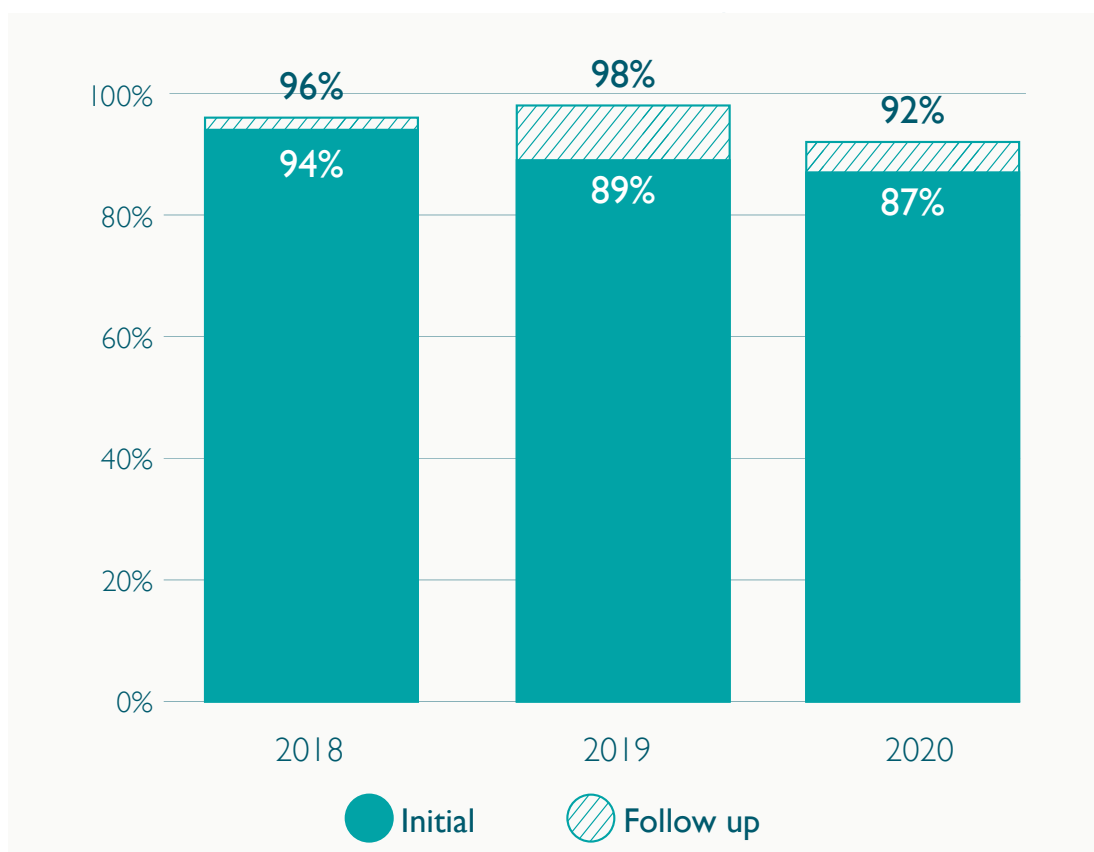


Figure 12 – Personal documents: Compliance

Compliance scores for personal documents at both initial and follow-up audits have remained high since 2018. Given the prevalence of passport retention both in Qatar,⁵⁵ as well as in surrounding countries,⁵⁶ these high scores highlight the work undertaken by the SC to help ensure that workers keep their personal documentation.

Despite these efforts, this topic has seen more critical non-compliances this year due to increased instances of passport retention and expired Qatari ID cards. None of these critical issues and observations were raised at main contractors.

⁵⁵ See, for example, the final sentence of the 'Qatar' subsection, p391 of the *Trafficking in Persons Report, 2019*: <https://www.state.gov/wp-content/uploads/2019/06/2019-Trafficking-in-Persons-Report.pdf>

⁵⁶ See the same report for the subsections on Bahrain, Saudi Arabia, Oman and the UAE.

Mohammed⁵⁷ started working in Qatar several years ago. He currently has no ID, and only has a business visa that is valid for a few more months. He is afraid to move freely because he does not want to be arrested by the police for lack of ID. He and would love to go home and see his family, but feels he would get into trouble at the airport without his documentation.

Compliance findings

Impactt raised critical issues and observations at 5 Tier 1 contractors related to passport retention:

- At 2 contractors, workers had only recently received their passports back, which management confirmed was due to the impending Impactt audit. Both issues remained open as neither contractor introduced management systems to prevent reoccurrence.
- 2 contractors (including one of the two noted above) confiscated workers' passports as soon as they are no longer working on an SC project. Neither was able to close this issue.
- At 1 contractor, workers handed in their passports to the accommodation camp boss as standard. Management reported that this is due to safety reasons as there had been cases of theft. Some progress was made in returning passports, although one camp boss was still found to be withholding them.
- At 1 contractor, 5 workers were not in possession of their passports due to processing of business documentation. The contractor provided a declaration to these workers that lacked clarity and was not explained in the workers' own language. This issue was closed at follow-up as all workers had their passports returned and we observed evidence of new procedures to provide declarations in workers' own languages.

Impactt found critical issues at 1 Tier 1 and 1 Tier 2 contractor related to expired Qatari ID cards:

- At both contractors, workers reported that they were afraid of leaving their accommodation site for fear of being arrested. Both contractors were unable to close these issues at follow-up, and the SC stopped working with one of them due to multiple critical non-compliances.

⁵⁷ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

E. Working conditions (H&S)

WW Standards requirements

The WW Standards entitles workers to:

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

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

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

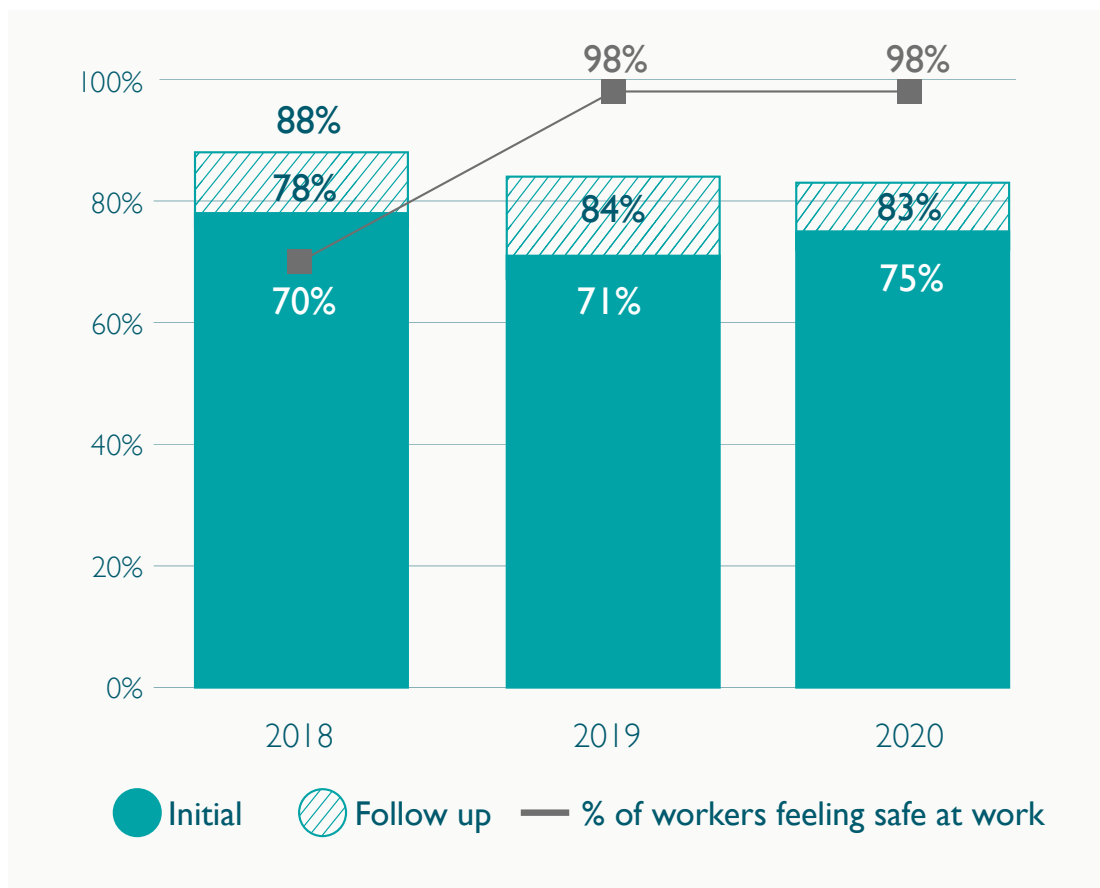


Figure 13 – Working conditions (H&S): Compliance vs safety satisfaction

Impactt's audit scope covers general health and safety management practices at accommodation and construction sites, including health and safety inductions for workers.⁵⁸

Compliance scores have decreased since 2018 from 88% to 83% at follow-up. Nevertheless, almost all workers (98%) reported feeling safe at work, which has risen from 70% in 2018. Additionally, there were no critical issues raised on this topic this year. Workers report higher safety standards compared to non-SC sites and are pleased to be receiving regular health and safety training. They appreciate the strict enforcement of regulations and feel that it is easy to raise safety concerns as supervisors are generally receptive. This is particularly commendable, as the SC's operations have reached peak workforce size this year.

The SC has taken steps to emphasise the importance of mental health by requiring any non-compliance on medical counselling provision to be considered as a 'major' issue. Medical counselling can provide much-needed mental health support to workers who are away from their families, working long hours. Providing medical counselling continues to be a challenge for contractors, and therefore the SC is preparing a recommended group of suppliers with whom contractors will be encouraged to engage in order to provide this service to their workers. In December 2019, the SC signed a 'Mental Health Pathway' agreement with the Hamad Medical Corporation to offer all workers mental health consultations.

Regarding physical health, this year we have seen a rise in cases where workers have had to pay for medical fees. In all cases, procedures existed to cover such fees, but workers were not aware of them due to poor communication. As a result, workers may have been less inclined to seek medical assistance, thinking they might have to pay for these services. This therefore presents a barrier to solving potentially serious health issues.

Compliance findings

Impactt raised issues at 18 contractors related to a lack of medical counselling provision for workers.

- 4 contractors were able to close this issue as they have since signed contracts with service providers. 7 were marked as 'progress made' as contractors had initiated contact with a counselling provider but had not signed an agreement to buy their services.
- This is an improvement on last year, which saw issues raised at 21 contractors, of which just 2 were closed.

Impactt also raised issues at 6 contractors related to workers having to cover some of their own medical costs, such as transport to and from hospital:

- In all 4 cases, policies and procedures existed to reimburse workers for medical costs, but workers were not aware of them. Of the 4 issues raised, 2 were closed at follow-up, as all workers at these two contractors understood the procedures. 1 was marked

⁵⁸ Impactt's scope of work does not include investigating accidents, including worker fatalities at construction sites. This is because our audits focused on worker welfare requirements rather than technical health and safety construction standards – the latter of which are the focus of BWI's joint inspections.

as 'progress made', as some workers were reimbursed for a small amount of hospital fees but no formal communication was provided to workers about the procedures or why this payment was made.

Non-priority topics – Findings summary table

Topic area	Findings
F. Accommodation and food	Severity and prevalence have remained stable since 2018. This checklist forms the largest part of the audit, resulting in the largest number of issues raised year-on-year. The vast majority (over 95%) of non-compliances are minor. Over the past 2 years, the SC has made a notable effort to move all contractors' workers to SC approved accommodation. These meet all the critical requirements set out in the WW Standards and are termed 'highly compliant', as per the SC's compliance rating threshold.
G. Due diligence	Almost all critical issues were closed by contractors this year at follow-up, despite an overall increase in issues raised at the initial audit. One isolated instance of worker coaching remained open this year at follow-up, resulting in an increase in the overall severity rating of this topic.
H. End of service procedures	We have seen significant improvements in the provision of repatriation flights across the past 2 years. This year, issues were found at 4 contractors, where either real or perceived financial barriers to resignation existed due to a lack of constructive dialogue with workers. 3 contractors were able to close these issues, with new policies and by raising awareness among all workers. However, at one contractor, this issue remained open as 10 workers reported at follow-up that they believed they would have to pay USD 500 if they resigned.
I. Worker representation	Compliance in worker representation has improved since 2018. The severity of issues has also decreased. Workers' feeling of respect rose from 57% in 2018 to 95% this year – which correlates strongly with this increase in compliance scores. Worker representatives and worker welfare forums (WWF) are now more commonly in existence, and are elected by workers and widely known to all workers. Now that they exist, it is important to ensure that these WWFs are used effectively, in order to increase dialogue between workers and management.
J. Contracts and administration	Severity and prevalence have both decreased since 2018. Contract substitution is progressively less of a concern as more and more contractors have adopted MOADSLA approved contracts, which are explained to workers in their own languages.
K. Disciplinary procedures	Severity and prevalence have remained low since 2018, with no critical issues raised this year. A common issue which does remain includes a lack of procedures for providing written warnings to workers following misdemeanor.
L. Induction	Severity and prevalence have been decreasing since 2018, coupled with an increase in compliance scores. This is due largely to widespread improvements in training and induction, covering increasingly more relevant topics. A commonly recurring issue however, is that workers are not being uniformly paid for time spent on training and induction.

Topic area	Findings
M. Grievance mechanisms	Severity and prevalence have remained stable since 2018. The SC has established an effective, anonymous Worker Hotline, providing a channel for workers to report any issues they wish to raise. This has handled 526 grievances this year. Despite increasing awareness, some workers are not yet made aware of its purpose or its existence by their employers.
N. Treatment	This has become less prevalent since 2018, as workers have reported fewer instances of harsh treatment, and contractors have had better policies in place in recent years. There is a strong correlation between improvement in compliance levels (which averaged 96% in follow-up compliance in 2020) and workers feeling safe at work (which reached 98% this year).
O. Transportation	Severity and prevalence have remained stable since 2018. Similar to Accommodation and Food, the vast majority (over 96%) of non-compliances are minor.

Table 3 – Non-priority topics: Findings summary table



Summary of progress against the Roadmap

The tables below provide an overview of activities this year, as reported by the SC, arranged by roadmap pillar. This was the final year of the three-year roadmap, and Impactt has therefore provided an assessment of the SC's progress against each pillar.

Pillar 1 - Improve the effectiveness of efforts to drive compliance with the WW Standards	
Ensure that contractors, rather than workers, pay the cost of recruitment: • 225 Contractors and OCPs have agreed to participate in SCURS payments to 16,942+ existing workers (with an expected peak of 27,342+). This accounts for 82% of the peak workforce across SC sites. 11 Contractors are also paying these reimbursement allowances to 18,000+ non-SC workers. The SC estimates that the total value of monetary benefit to these 45,400+ workers amounts to USD 30.4 million over a period of 12 to 36 months. • The SC is working to ensure that SCURS commitments, which involve reimbursing workers beyond demobilisation, are being attested by MOADSLA, with 80 contractors having such attestations in place at the time of writing. • The SC also continues to require that all recruitment is conducted through MOADSLA-approved agencies. Support contractors in improving the effectiveness of their due diligence processes: • From February 2019 onwards, 175 WWOs and 110 management personnel undertook training on the SC WW Standards. • The SC convened Project Welfare Forums (PWWF) meetings at 3 sites to discuss workers' welfare issues directly with each project's main contractor(s). • The SC continued to conduct pre-mobilisation checks on 100% of subcontractors. The SC has rejected 15% of subcontractor mobilisation requests⁵⁹ due to worker welfare-related issues.	• Proposed contractors are following the pre-mobilisation approval process to check that these companies are in compliance with the SC's worker welfare requirements and that compliance with the SC WW Standards is mandated in sub-contracts. • This white list of highly compliant OCPs was shared by the SC with the Technical Delivery Office team to help them finalise the selection of subcontractors in August 2019 and January 2020. Encourage contractors to share challenges transparently: • The SC continued to convene bi-monthly Programme Welfare Forum (PWF) meetings for main contractors to discuss priority issues and exchange best practice. • The SC facilitated the rollout of other contracting parties' key stakeholder (HR/ Project team) forums in order to address key issues identified through the WWF, and the SC/ BWI/ External Monitor audits and inspections. • Build contractors' capacity to develop and implement improvements within their own operations: • WWD has rolled out an on-boarding induction toolkit that can be used by main contractors for their OCPs. • From February 2019 onwards, 175 WWOs and 110 management personnel undertook training on the SC WW Standards during workshops.

59 Since January 2017

Impactt's assessment

- Impactt recognises that the SC has made some important achievements by implementing SCURS. Impactt can verify that SCURS is now being delivered at a large scale, and considers that it is a trailblazing initiative. Impactt notes the SC's efforts in helping to ensure that contractors' SCURS commitments have been attested by MOADSLA. This year, Impactt verified SCURS payments to workers at 19 of 22 contractors audited with one also voluntarily paying this allowance to non-SC workers. It will be vital to increase the overall level of payout made via SCURS payments by ensuring contractors continue to pay following demobilisation. We recommend that the SC continues to encourage this among contractors, building on the good progress evidenced during our fourth quarter (January 2020) audits. This could result in significant benefits to workers.
- Impactt also acknowledges the steps taken by the Government of Qatar to prevent recruitment fee payments in source countries, in particular by adding additional QVCs in Nepal and the Philippines. As noted in the 'Ethical recruitment' section, Impactt found the QVC in Bangladesh to be providing all intended services in an accessible manner, and has shared a series of recommendations, which can be applied to other QVCs, where applicable. We also recommend increasing this focus preventing fee payments by tightening contractor requirements on end-to-end understanding and management of ethically recruited supply chain workforces.
- Impactt also recognises steps taken in providing training on WW Standards to management personnel, and in convening PWFs to resolve issues. Impactt notes in particular how the SC has used its influence to encourage some main contractors to take ownership of resolving issues with subcontractors – for instance, by providing direct salary payment to workers in extreme cases, where subcontractors neglect to pay.
- We recommend that the SC continues to raise awareness through training sessions to build contractor understanding of the root causes of issues, focussing on key recurring topics including ethical recruitment, wages, working hours, worker benefits, and increasing dialogue with workers. Impactt has begun trialling a new pilot scheme that embeds targeted training between initial and follow-up audits, in order to increase understanding and closure of key WW Standards issues and deliver lasting impact.

Pillar 2 - Prompt behaviour change in manager-worker interaction

Prompt behaviour change in manager-worker interaction

- The SC launched an anonymous Grievance Hotline in April 2017 across all projects and all contracting tiers. As of January 2020, of 563 hotline grievances received, 519 were resolved and 41 were under investigation. Out of these grievances, 6 are pending due to inadequate information currently provided by the complainant.
- The SC hired Qatar University's Social and Economic Survey Research Institute (SESRI) to conduct face-to-face worker sentiment and satisfaction surveys. In 2018, SESRI surveyed 2,048 workers (representing approximately 7% of the 2018 workforce). The results of the surveys were included in the 4th Annual Workers' Welfare Progress Report. The second phase of the survey, covering 2,250 workers (7% of the total workforce in 2019) was completed in December 2019.

Ensure that contractors run effective worker representation systems and grievance mechanisms:

- As of January 2020, there are 106 active WWFs covering 20,800+ workers (84% of the workforce).
- As of January 2020, 69 WWFs have elected representatives through democratic elections, covering 32 accommodation sites, in which 18,000 workers are accommodated. Overall voter turnout was approximately 81% in these elections.

- 11 contractors are holding WWFs for non-SC workers too, which covers 10,140 workers.
- The SC has raised awareness of WWFs and the grievance hotline, including by providing workers with stickers and cards, and putting up posters at accommodation sites.

Build management skills:

- The SC has continued its partnership with leading health and safety training provider the Qatar International Safety Centre (QISC), which began in July 2017.
- 231 WWOs and 150 management personnel undertook training on the SC WW Standards.
- WWD has rolled out an onboarding induction toolkit that can be used by main contractors for new subcontractors.

Build worker skills:

- The QISC delivered H&S and worker welfare induction training to 10,040 workers, and OHS training to 295 workers.
- This year, 296 Workers Representatives received H&S awareness and soft skills training from QISC, and as additional 44 participated in training delivered by BWI.

Impactt's assessment

- Impactt recognises the improvement in managers' treatment of workers. Compliance results on 'treatment' have improved to 96% this year, and workers commonly (98%) feel safe working for their managers. Worker representation has also improved, with WWFs and worker representatives becoming more prevalent.
- Impactt also recognises the SC's move to publish statistics about the use of its grievance hotline, which has handled 563 grievances this year. This could help stakeholders – particularly workers – to understand that it is a viable option for them to resolve issues.
- The increased focus on training, delivered by QISC and other third parties, will be key to increasing contractors' awareness and understanding of their responsibility to take full ownership of addressing and resolving high priority topics. It will also be important to monitor progress at contractors receiving this training to assess its effectiveness, and continuously develop and adapt training modules based on results.
- However, Impactt notes that worker dialogue must be further improved, with 37 issues still outstanding at follow-up simply because workers were not adequately informed of changes. This suggests that workers are often unaware of progressive policies and procedures that benefit their welfare, including the WWFs and the grievance hotline. Impactt recommends that the SC delivers new forms of innovative training to contractors covering effective worker dialogue, and works with them between audits to help ensure that they are communicating all policies and procedures in a way that workers understand.

Rajeb⁶⁰ is glad that he can raise issues with different people: his camp boss, supervisor, safety officer, foreman and his welfare team. Every Saturday, he and his fellow workers attend a meeting arranged by the company welfare team where they can raise any grievances. He feels confident that if his company does not resolve an issue, he would be able to escalate it to the SC via a toll-free hotline.

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

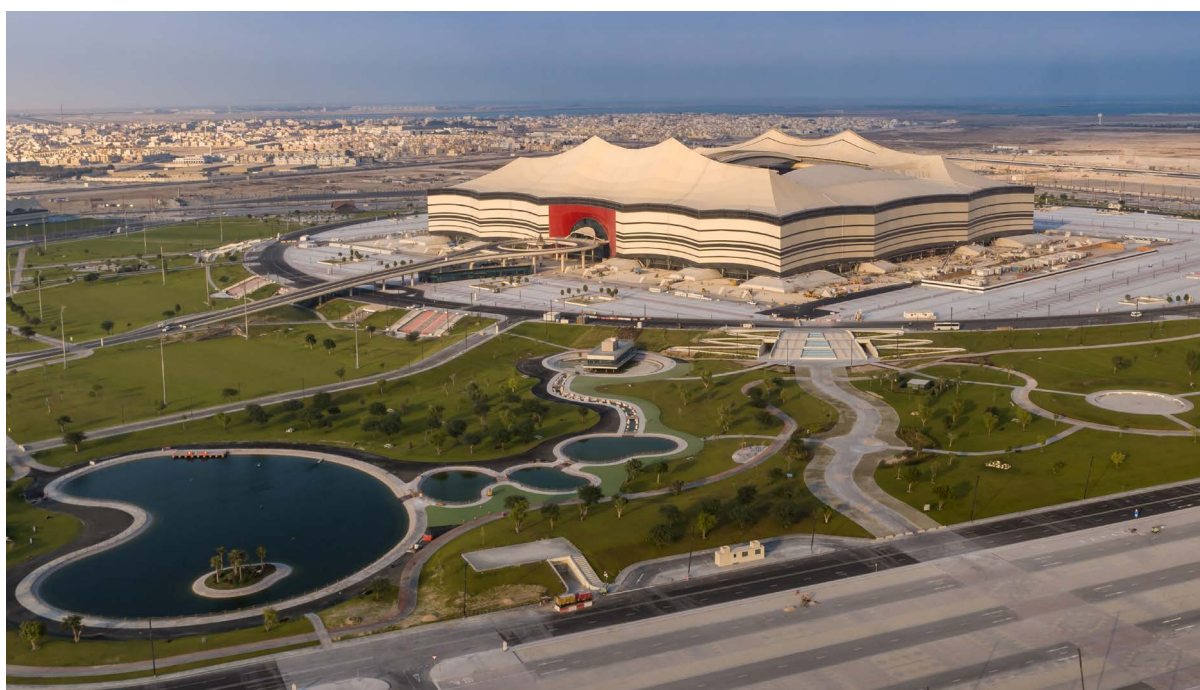
Pillar 3 - Collaborate for greater reach and impact

Participate in and contribute to multi-stakeholder action to catalyse improvements in addressing systemic issues

- The SC reported 186 contractors to MOADLSA for their critical non-compliances. Based on this, MOADLSA took action as follows: (a) it required some contractors to shut down their accommodation and move to compliant accommodation, (b) blocked and blacklisted some contractors (c) approved direct cash payments through main contractors of worker salaries, in a few cases where sub-contractors had not paid workers (d) shut down sites found to be violating summer working hours requirements (through unannounced visits).
- A research study was conducted on heat stress management by the ILO, MOADSLA, and FAME Lab, in collaboration with the SC, throughout the summer of 2019. The initiative was designed to assess the impact of workplace heat on the health and productivity of workers, and the findings showed that the SC had robust heat stress management plans in place.
- The SC has actively participated in several international fora and events.⁶¹

Impactt's assessment

- Impactt recognises the efforts taken by the SC in engaging external stakeholders to share challenges, knowledge and lessons learnt through its work. We recommend that the SC continues to share experiences, and builds collaborative partnerships with public and private sector entities facing similar challenges, particularly regarding the establishment of ethical recruitment corridors, as detailed in the recommendations below.



⁶¹ For example: 40th session of the UN Human Rights Council in Geneva (February 2019), 6th Labour and Workers Conference (May 2019), UN Forum for Business and Human Rights (November 2019).

Conclusion and Roadmap recommendations

The SC's efforts to implement its WW Standards among its contractors in this year have resulted in progress on reimbursement of recruitment fees, worker representation, annual air ticket allowance and provision of repatriation flights. The innovative SC Universal Reimbursement Scheme (SCURS) is widely implemented, and the SC calculates the total reimbursement by contractors to SC and non-SC workers could reach USD 30 million. This is paid across a payment period of up to 36 months.

Further, the SC's rigorous monitoring and control system has resulted in Impactt identifying fewer priority areas – with the topics of 'worker representation', 'contracts and administration' and 'treatment' giving less cause for concern.

This work has taken place within the context of important changes in national law, including the proposed abolition of the Kafala system, the removal of exit permits for all workers and the adoption of a non-discriminatory minimum wage – the first of its kind in the region. In addition, the Qatar government established Qatar Visa Centres (QVCs) in key labour source countries with the intention of making recruitment processes more streamlined and transparent.

Qatar's delivery of the Tournament continues to attract interest from a wide range of audiences, with many stakeholders particularly interested in human rights. Stakeholders praised efforts by the SC to encourage contractors to repay workers' recruitment fees^{62,63} and in developing WW Forums, which now provide further learnings for the Qatari Government.⁶⁴

This year, Impactt focused its attention on contractors lower down the supply chain, which may explain the overall decrease in compliance scores, down to 82%. Main contractors had made progress on compliance in previous years, and leveraging their influence to drive improvements at subcontractor level will be important, moving forward.

We believe that the SC is poised to leave a lasting legacy in pioneering ethical recruitment practices and sustained worker welfare. We have outlined a new 3-pillar roadmap to help achieve these aims, with recommendations on how the SC can best create a positive legacy.

⁶² See, for example <http://www.globalconstructionreview.com/news/qatar-pay-back-workers-recruitment-fees-5m-restoral/>

⁶³ <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbm6wczrmw9rcr>

⁶⁴ <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbm6wczrmw9rcr>

Pillar 1 – Ensuring a positive legacy

It is imperative to introduce strict expectations of contractors in the hospitality and other service sectors ahead of, throughout and after the Tournament. The SC should support in assigning responsibility and designing new processes to safeguard its legacy as a proponent of worker welfare. This will help to deliver a Tournament that promotes a lasting respect for human and labour rights beyond the final whistle.

Recommendations:

1. Prompt wider adoption of the WW Standards, the SC's practices and innovations across the State of Qatar. This includes the Hospitality Working Group and other areas under the International Labour Organization Technical Cooperation Programme.
2. Continue to develop and disseminate a white list of approved subcontractors within the SC programme and Qatar.

Pillar 2 – Reinforcing ethical recruitment

Main contractors should be required to take full ownership of the recruitment processes used by their subcontractors and help ensure that their own selection of subcontractors complies with ethical recruitment practices. This could help to ensure that they only subcontract when strictly necessary - in light of the higher rate of major and critical issues observed at Tier 1 and 2 contractors. It would also enable main contractors to gain more oversight over and better ensure compliance on recruitment activities by these lower tiers, where subcontracting is required.

Recommendations:

1. Tighten requirements on Ethical Recruitment. Contractors should provide evidence of end-to-end management of recruitment processes, including:
 - a. Risk assessment of agencies in selection processes and due diligence over their sourcing of labour through any sub-agencies.
 - b. Evidence of the realistic costs of recruitment in agreements with their agencies, supported by detailed breakdowns.
 - c. Capacity building programmes, with training for all staff (and agency partners) on new ethical recruitment policies.
 - d. Collaboration with QVCs and organisations in labour source countries.
2. Increase responsibilities of main contractors in conducting due diligence among any sub-contractors hired.
 - a. Require main contractors to carry out regular, detailed checks of the above requirements at all subcontractors used.
 - b. Establish and communicate clear consequences for main contractors whose subcontractors continue to breach these requirements.

Pillar 3 - Providing sustainable solutions to recurring issues

The issues highlighted within the priority topics must be addressed in a sustainable manner; through increased emphasis on practical training, together with a tightening of enforcement efforts.

Additionally, the increased oversight of subcontractors by main contractors outlined in pillar 2 must be accompanied by an overall increase in dialogue between contractors and subcontractors. Ensuring that both contractors and subcontractors not only know the VV Standards compliance requirements – but also understand the root causes of issues is crucial to developing long-term, sustainable solutions.

Recommendations:

1. Increase awareness and understanding among contractors through targeted training programmes and ongoing monitoring of progress to help ensure contractors are taking full ownership of high priority topics.
 - a. These topics include ethical recruitment, wages, working hours (particularly regarding security staff), worker benefits and increasing worker dialogue. Additional topics should be added on an ad-hoc basis, based on any further findings.
 - b. Monitor progress at contractors receiving this training to assess its effectiveness, and continuously develop and adapt training modules, based on their performance.
2. Continue encouraging full SCURS payments across all contractors in collaboration with MOADLSA, particularly for demobilised workers.
 - a. Continue driving an increase in the total proportion of contractors participating in SCURS.
 - b. Continue to engage with MOADLSA to monitor and verify that all contractors are paying the full SCURS payments to workers, even once they are demobilised from SC projects, or cease working for their employer.
3. Incentivise and improve dialogue between contractors and their subcontractors, beyond auditing requirements.
4. Monitor ongoing dialogue between workers and contractors to ensure workers understand new and existing policies, procedures and practices.

Kwasi⁶⁵ is 29 and worked as a security guard in his home country before coming to Qatar. He earned USD 150 per month. He came to Qatar to improve this income, so that one day he could start his own security business in his home country, and create a brighter future for his family. Now, every month, Kwasi can afford to send USD 250 home to his family to cover living expenses and his child's education. He did not pay any recruitment fees, and he received his visa and his flight ticket directly from his employer. Kwasi appreciates that he is paid on time and finds the accommodation comfortable. He feels respected in his job and is proud to be building the Tournament stadiums.

⁶⁵ Actual worker names are anonymised in pen portraits throughout this report, and these pseudonyms have been chosen at random.

Limitations

Impactt's audits findings for this report have the following limitations:

- At 3 contractors, transparency issues occurred. At 1 contractor, this concerned both worker coaching and a lack of accurate documentation. Transparency issues were also raised at 2 further contractors that presented inaccurate documentation.
- At 1 contractor, no follow-up audit was conducted, because the SC suspended work with the contractor shortly after our initial audit due to ongoing failure to correct critical non-compliances.
- At 1 contractor, an incomplete list of workers was provided, leading to a smaller sample of workers interviewed.

Appendix 1 – Topic area descriptions

Topic area	Requirements
Due diligence	• Contractor conducts self-audits on a monthly basis. • Contractor conducts ad hoc audits of their sub-contractors. • Contractor ensures that their subcontractors undertake monthly self-audits. • Contractor submits required information to the SC on a monthly basis. • Contractor cooperates with the External Monitor's audits.
Treatment	• Contractor treats workers equally and fairly in their selection, employment, training and promotion opportunities. • Contractor has written policies on equal opportunities in order to: prohibit the imposition of additional or financial penalties as a disciplinary measure; prevent violence, bullying and harassment; prohibit the exploitation of workers' vulnerabilities; and take disciplinary actions against employees who breach the prescriptions of the WW Standards. • Workers are free to move in and out of the accommodation site and to travel to their home country during leave without penalty or threat of termination.
Recruitment fees	• Contractor reimburses workers who provide proof of paying recruitment fees. • Contractors pay for all costs of relocating workers to Qatar.
Contracts and administration	• Contractor uses recruitment agents registered with MOADLSA. • Contractor has a written agreement with the recruitment agency which meets WW Standards requirements. • Workers receive a written offer of employment upon recruitment. The offer of employment is explained to them in a language which they understand, and the workers sign the offer of employment without coercion. • Workers receive a MOADLSA-attested employment contract which complies with legal requirements and is explained to workers in a language they understand. • The terms of the employment contract are the same or more advantageous than those of the offer of employment. • Contractor maintains employee files as required by the WW Standards.
Induction	• Contractor completed a New Starter Checklist for each new worker. • Contractor provides an accommodation induction to workers in a language they can understand, which covers the requirements in the WW Standards. • Contractor delivers health and safety training. • Contractor provides workers with training and refresher sessions to perform their jobs.

Topic area	Requirements
Personal documents	- Contractor ensures that workers have a valid residence permit, Qatari ID and health card. - Workers are in possession of their personal documents. - Contractor provides workers with a storage facility.
Construction site (H&S)	- Contractor provides workers with health insurance or a Hamad card. - Contractor pays for medicine, examinations and treatment.
Wages and allowances	- Contractor pays travel expenses for workers' annual leave. - Contractor pays workers in accordance with the Wage Protection System. - Deductions from wages are made in accordance with legal requirements. - Contractor provides workers with a payslip, as required by the WVV Standards. - Overtime is paid according to legal requirements. - Contractor provides a rest day in lieu when workers work on a rest day.
Working hours, rest and leave	- Contractor complies with legal working hours limits: weekly working hours, summer working hours, Ramadan working hours. - Contractor provides legally mandated rest breaks and rest days. - Contractor provides legally mandated annual leave, sick leave, bereavement leave and maternity leave. - Contractor provides legally mandated public holidays.
Disciplinary procedures	- Contractor has received approval of its disciplinary policy from MOADLSA and explained the policy to workers. - Deductions for disciplinary purposes comply with legal requirements.
Accommodation and food	The SC has a detailed set of requirements to cover accommodation and food, including: infrastructure, bedrooms, showers, communal areas, dining, communication and laundry.
Transportation	Requirements related to the transportation of workers from their accommodation to the construction site.
Grievance mechanisms	Contractor advised workers on avenues to report grievances.
Worker representation	- Contractor appoints a Workers' Welfare Officer. - Contractor establishes a Workers' Welfare Forum, which meets monthly and has written minutes. - There is one Worker Representative by nationality, elected by workers.

Topic area	Requirements
End of service procedures	• The contractor pays for repatriation expenses. • The contractor pays workers an end-of-service gratuity before they return to their home country.

Table 4 – Impactt's audit structure (topic areas)

Appendix 2 – Impactt’s audit approach

Impactt’s compliance monitoring methodology for the SC

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

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

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

In order to achieve this:

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

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

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

Audit structure

The structure of Impactt's audits includes:

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

What our audits cover:

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

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

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



Appendix 3 – Methodology

Scope of Impactt's work

Prior to beginning its compliance monitoring work in 2016, Impactt developed a bespoke auditing methodology to assess contractors' compliance with the WW Standards and relevant Qatari law.⁶⁶ Impactt's audits are structured following the worker journey (see Appendix 1 for a description of topic areas). Impactt selected which contractors to audit independently and randomly from a cross-section of projects and contracting tiers⁶⁷. Impactt selected a sample of workers for interview, ensuring a cross-section of nationalities, job types and lengths of service⁶⁸ and conducted group and individual interviews, satisfaction and socio-economic surveys at the workers' accommodation or on site away from managers to allow workers to speak freely and confidentially. See below for details on sampling and methodology.

Limitation: Cooperation during audits

In 39 of 43 initial and follow-up audits conducted this year, contractors were cooperative with Impactt, providing all documents requested and not interfering with the audit. However, there were 5 transparency issues raised. 3 of these were document-related (3 different contractors), and 2 were coaching (the same contractor at both initial and follow-up audit). This type of attempt to 'game the system' is a widely documented, unintended consequence of auditing regimes. In all cases, Impactt was able to uncover the real situation and report accordingly to the SC.

Sampling of contractors

Impactt selected which contractors to audit independently and randomly from a cross-section of projects and contracting tiers. Table 5 below shows that Impactt has covered all project sites and, where applicable, all tiers. Since 2018, Impactt has shifted its focus towards lower tier suppliers.

Site inspections were conducted during audits of main contractors only. To allow for a follow-up audit in the quarter after the initial audit, only contractors with 4+-month assignments to SC projects were included in the sample.

⁶⁶ Impactt's bespoke methodology followed the WW Standards. Impactt audited contractors against Qatari labour law in the following areas: working hours, rest and leave and disciplinary procedures.

⁶⁷ Site inspections were carried out during auditing main contractors only. To allow for a follow-up audit in the quarter after the initial audit, only contractors with 4 or more month assignments to SC projects are in the sample.

⁶⁸ To gain a relevant and timely insight into current recruitment procedures, workers who were recruited within the year are overrepresented.

Sites	2020			2019			2018			Overall		
	MC	T1	T2	MC	T1	T2	MC	T1	T2	MC	T1	T2
Al Bayt Stadium	1		1	1	1	1	1	1	1	3	2	3
Al Bidda (SC office)	1			1			1	1		3	1	0
Al Janoub	1									1	0	0
Al Rayyan Stadium	1	2		1	2		1	1		3	5	0
Al Thumama Stadium		3	1		4	1	1			1	7	2
Al Wakrah Stadium		3	1	1	2	1	2	2		3	7	2
Doha Port	2			2			1			5	0	0
Education City		2								0	2	0
Khalifa							1	2		1	2	0
Lusail Stadium		3	2		3	2	1	1		1	7	4
Training sites	1			1						2	0	0
Qatar Foundation			1		2	1	1	2	1	1	4	3
SC Nursery							1			1	0	0
Ras Abu Aboud Stadium		1			1				2	0	2	2
Production Workshops ⁶⁹		1			1					0	2	0
Total	7	15	6	7	16	6	11	10	4	25	41	16

Table 5 – Coverage of SC project sites⁷⁰

- Main contractors: these contractors have a direct relationship with the SC and a contractual obligation to ensure their subcontractors comply with the WW Standards.
- Tier 1: specialist companies such as excavation, scaffolding, landscaping, contracted by the main contractors.
- Tier 2: generally manpower agencies supplying labour to other companies.

⁶⁹ Impactt audited the off-site production facilities of one supplier to the SC sites that rolled out the WW Standard to all his operations.

⁷⁰ Some contractors operate across multiple sites - and Impactt's document reviews and management interviews during audits cover operations at all of these sites. Therefore, the total number of sites covered in the table (28) is greater than the total number of audited contractors (22).

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

Impactt sample 2020				
		Sample	SC scope ⁷¹	% covered
Interviews conducted ⁷²		902	32,136	3%
# of workers' nationalities		18	38	47%
Worker interviews	Main	291	8,496	3%
	Tiers 1-3	611	23,640	5%
SC sites audited		12	14	86%
Contractors audited (initial & follow-up)	Main	6	44	14%
	Tiers 1-3	16	361	5%

Table 6 – Impactt sample for 2020

The nationalities of workers interviewed are shown in the figure below (Figure 14). Impactt interviewed workers from 18 of the 38 nationalities present at SC projects. 79% of all workers interviewed were nationals of Nepal, Bangladesh and India, the most common countries of origin for workers at SC projects.

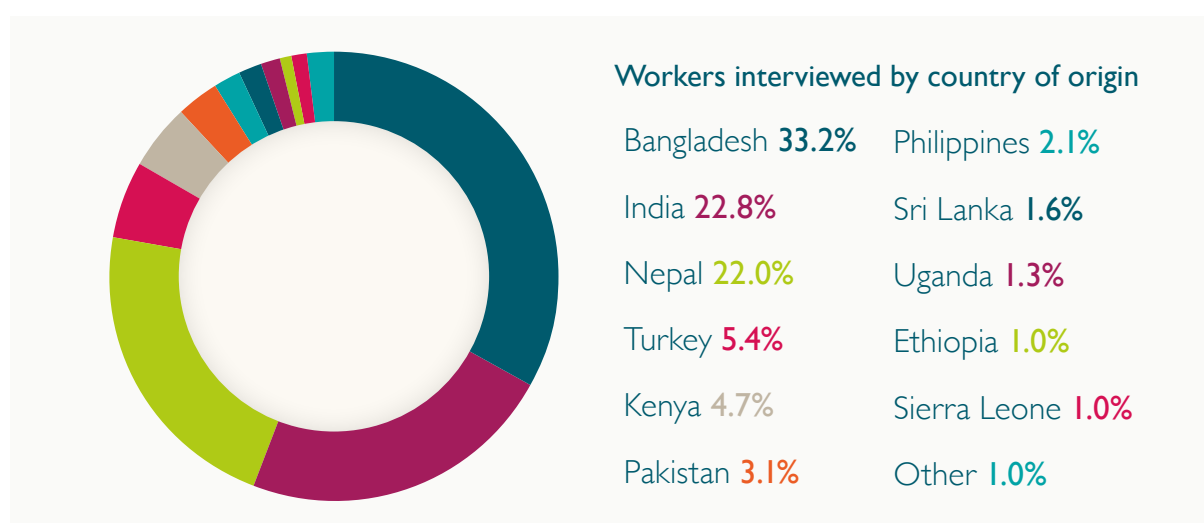


Figure 14 – Workers interviewed by country of origin

⁷¹ Data provided by the SC, as of December 2019

⁷² Impactt interviewed 535 workers when carrying out initial audit and 367 during follow-up audits. To follow up on compliances raised, Impactt selected some workers who were interviewed in initial audits again for follow-up interviews. Worker satisfaction presented in this report draws on data from initial audits only, unless progress between initial and follow up audit is specifically analysed. This is to avoid any doubt over double counting.

Worker Interview Methodology

An Impactt worker interviewer spends up to three person days (during initial audits) interviewing a contractor's workforce. In each audit, we conduct group and individual worker interviews. This year, our total worker sample was smaller, due in part to the two special audits conducted outside of our usual scope, and an increased proportion of individual and small group interviews, compared to surveys. The latter occurrence is due to the smaller workforces at lower-tier contractors – whereby the number of workers taken off-duty for interviews had to be limited to avoid serious business disruption. Likewise, others had an SC project workforce that was itself smaller than our regular sample size. However, additional focus on individual and small group interviews allowed us to gain a good understanding of the higher number of critical and major issues raised, and also to gain deeper, more narrative insights into the trends in worker satisfaction presented in this report.

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

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

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

Method	Output
Narrative interview After having built rapport and trust with workers Impactt asks open ended, thematically wide questions at the beginning of each group interview. This is to encourage workers to share their experiences and realities and to understand what matters most to them without leading, influencing or narrowing the answers. Individual interviews are mainly narrative.	• Workers sentiments and priorities • Pen portraits (workers' stories) – which can be found throughout this report

Method	Output
Semi-structured interview The core of each worker interview progresses along the “worker journey” (from recruitment right through to end of service). Impactt prompts workers to share their workplace experiences in relation to particular thematic areas covered by the WWS.	• In depth understanding of non-compliances, observations and how they affect workers. Findings are used confidentially by auditors in management interviews • Workers' likes and dislikes.
Structured interview or survey Depending on workers' literacy levels we either ask targeted and closed questions, or carry out a written survey at the end of each interview. This allows us to measure workplace satisfaction and learn specific details, including costs of recruitment.	• Quantitative data including a number of satisfaction metrics and recruitment fee reporting

Table 7 – Interview methods and outputs

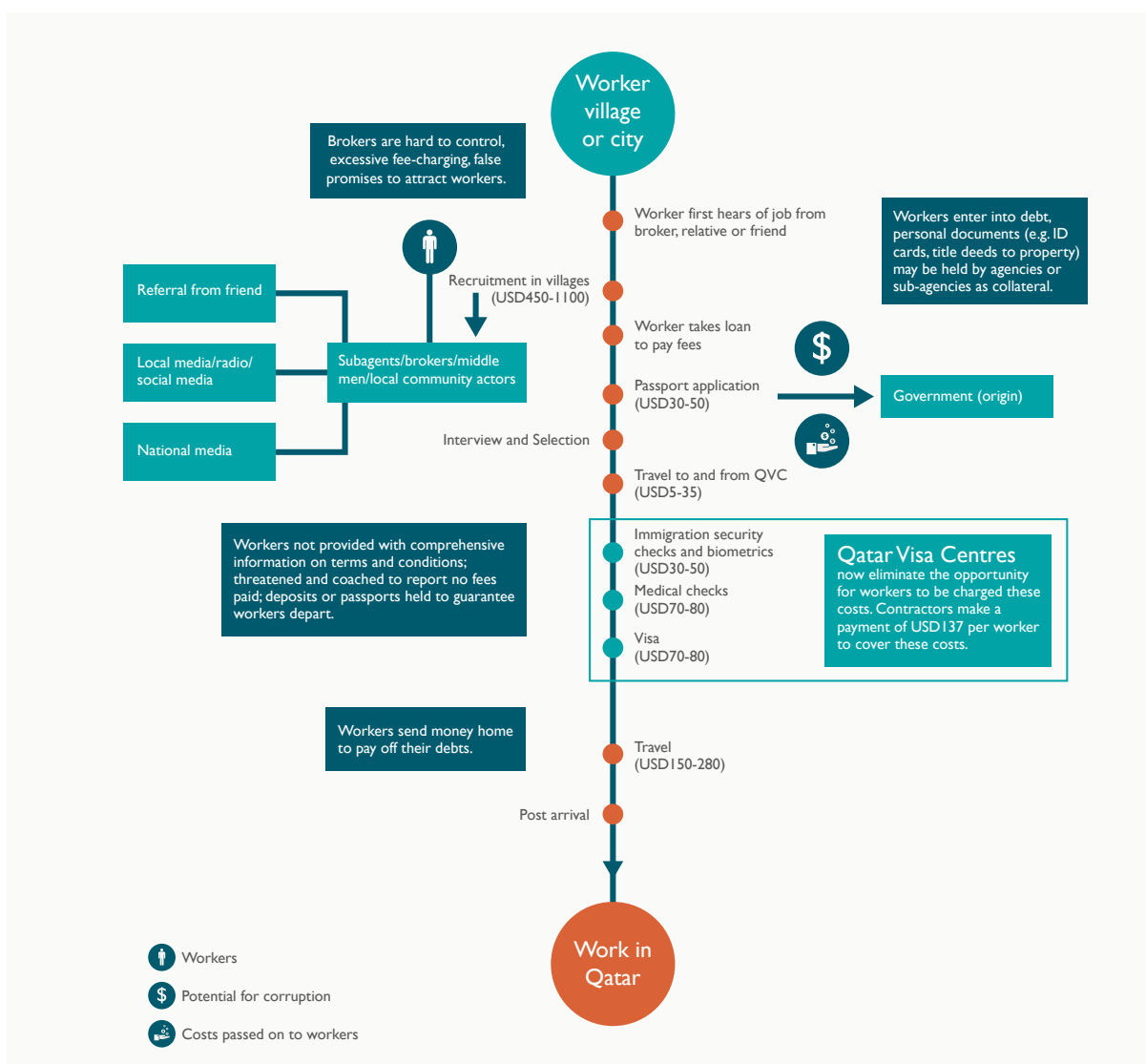
Notes on ‘Impactt’s External Compliance Monitoring Programme’ infographic:

- This year, as requested by the SC, Impactt conducted two additional special audits at contractors with ongoing critical issues, which do not fall within the reporting scope of this report. One of these contractors originally fell within this year’s audit scope, while the other fell within last year’s – but both were being audited for a third time due to their ongoing performance issues. Therefore, our total number of contractors audited this year is 23, with 22 falling within the regular reporting scope. Impactt also carried out a visit to the QVC in Dhaka, Bangladesh and visits to a number of ‘beyond compliance’ activities alongside the SC which are detailed in the 2019 Annual Report.
- This number represented does not include the 49 worker interviews conducted during the two additional special audits, outside of this reporting scope. Impactt also audited a greater number of lower tier contractors with small workforces, whereby the number of workers taken off-duty for interviews had to be limited to avoid serious business disruption – and therefore more in-depth individual and small group interviews were conducted. Please see Appendix 3 for further details.
- 1 out of the 5 contractors initially audited in October 2019 has been suspended by the SC and reported to MOADLSA before January 2020, due to continued lack of cooperation on critical welfare issues. Impactt conducted follow-up audits at the remaining 4 contractors.
- Other nationalities included Turkey, Kenya, Pakistan, Philippines, Uganda, Sri Lanka, Sierra Leone, Ethiopia, Ghana, Sudan, Egypt, Thailand, Nigeria, Eritrea, Somalia.

Appendix 4 – Recruitment into Qatar: the worker journey

Recruitment into Qatar

This infographic explains the process of recruitment of workers from villages/ cities in Bangladesh, Nepal and India to Qatar. Highlighted are the approximate costs incurred by workers (in brackets), key vulnerabilities to which workers are exposed and areas where corruption is common.



The costs above are only a snapshot of the recruitment-related costs incurred by workers. The average total fees paid range from **USD 500** to **USD 5000** with the maximum reported fees at **USD 8000**. It takes a worker between 6 and 36 months to repay the debts incurred.



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GOOD FOR WORKERS
WORK FOR BUSINESS