



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

Making strides: delivering real impacts for workers



MAKING WHAT'S GOOD FOR WORKERS
WORK FOR BUSINESS

February 2019

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Glossary of terms

BWI

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

Bulletin I

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

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 the companies that have a contractual relationship with the main contractor. A contractor to a main contractor is referred to as a Tier 1 subcontractor. A contractor to a Tier 1 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 Labor Market in the GCC countries

H&S

Healthy and safety

Manpower agency

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

MOADLSA

Ministry of Administrative Development, Labour and Social Affairs

Programme Welfare Forum (PWF)

Joint forum of 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

Prescribed language

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

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 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

The SC's scheme for reimbursing workers in recompense for 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 produced 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: These are cases where contractors go above and beyond the minimum WW Standards or legal requirements, or demonstrate sustained improvement.

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

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

Impactt's auditors classify observations as follows:

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

Executive summary

This is Impactt's third 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 first report.

The SC first appointed Impactt as external compliance monitor in 2016. Impactt's role is to monitor the compliance of contractors and the SC with the Workers' Welfare (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), SC audits (second party), external monitor audits (third party), and inspections conducted by the Ministry of Administrative Development, Labour and Social Affairs (MOADLSA).¹ The SC's audit and inspection regime is complemented by health and safety inspections conducted jointly by the SC-Building and Wood Workers' International (BWI) Joint Working Group (SC-BWI JWG). This system delivers a very high level of oversight and transparency on conditions for workers, with more regular auditing than in many other sectors.

The SC's programme continued to develop over the year. In particular, there has been a commendable focus on the reimbursement of recruitment fees, increasing collaboration with MOADLSA, providing guidance on the design for Workers Welfare Forums (WWF), taking the lead in compliance with the new, temporary national minimum wage, and strengthening enforcement by sharing information on contractor non-compliance to inform enforcement activity. The SC also launched Bulletin 1 in February 2018, which further strengthens the management of the supply chain and increases health screening requirements.

In 2018, the State of Qatar continued to introduce labour law and regulatory reforms concerning migrant workers by reducing the gap between national and international labour law, introducing a temporary minimum wage and making changes to the use of exit permits and improvements in the process for settling labour disputes. The Technical Cooperation Programme² (TCP) between the State of Qatar and the International Labour Organization (ILO) commenced in January 2018.

Scope of Impactt's work

The scope of Impactt's monitoring covers all contractors across every contracting tier, working at SC competition and non-competition venues. 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.³

¹ MOADLSA audits follow Qatari labour law rather than the WW Standards.

² This agreement aims to ensure compliance with ratified international labour Conventions, and help achieve incremental progress on upholding fundamental principles and rights at work in the State of Qatar during the period 2018–20.

³ 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.

In 2018, Impactt conducted three-day initial audits of 6 contractors each quarter, and two-day follow-up audits at each contractor in the quarter following the initial audit – a total of 24 initial and 24 follow-up audits. Impactt has full control over the selection of contractors and workers involved. Impactt interviewed 1,109 workers (4% of the total workforce).⁴ Every audit involved a two or three-person team consisting of lead auditor(s) and a dedicated worker interviewer. This represents a total of 334 person days in the field.

In the vast majority of audits conducted in 2018, contractors were cooperative with Impactt, providing all documents requested and not interfering with the audit in any way. However, for the first time, there was one instance of a contractor providing inaccurate records and two instances in which Impactt found evidence of worker coaching. This type of attempt to 'game the system' is a widely documented and unfortunate unintended consequence of auditing regimes. In both cases, Impactt was able to uncover the real situation, and the issue did not recur during our follow-up audits.

In addition to the audits, Impactt conducted worker satisfaction and socio-economic surveys and focus groups specifically to discuss the issue of recruitment fees.

Findings

The average overall initial audit compliance rate across the 24 contractors audited in 2018 was 75%. By the time of the follow-up audits, scores increased to 89% overall. During initial audits, average compliance was high in the areas of personal documents (which includes workers being in possession of their passports), transportation, accommodation and food, worker representation and induction.

Looking at overall progress in 2018, Impactt found that contractors closed out or made progress on 71% of issues.⁵ This is a significant improvement on the previous year (58%). Compliance rates after follow-up audits were equal to or above 76% in all areas except recruitment fees (67%) and disciplinary procedures (70%). The effective closure of more serious issues is notable. In 2018, contractors either closed or made progress on 100% of critical non-compliances and 88% of critical observations, in comparison to 45% and 36% in the previous year.

The increased pace of remediation is largely due to the SC's increasingly interventionist approach, as can be seen from its solid progress against the Roadmap. The SC supports subcontractors directly in improving their compliance, rather than relying on main contractors to pass the message down the supply chain. The SC has identified and communicated solutions to complex issues that were previously going unresolved. As a result, contractors have a better understanding of compliance requirements. This is driven by engagement between the SC and mid- and senior-level management of contractors, as well as company-to-company engagement through the Programme Welfare Forum (PWF) meetings. Contractors have more capacity to drive compliance

⁴ On average, Impactt interviewed a higher percentage of the workforce than required by SMETA Guidelines.

⁵ This excluded issues that could not be verified or where the contractor was 'unable to show improvement' 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 conduct second follow-up audits to verify their status.

in the form of dedicated personnel (Worker Welfare Officers, WWO) assigned to lead on compliance with the WW Standards. By the time of Impactt's follow-up audits, all audited contractors had assigned a WWO.

Impactt found progress and challenges in the following key priority areas (for detailed results see the relevant chapters):

- **Recruitment fees:**

The Challenge: Impactt found issues related to recruitment fees at all 24 contractors audited. Compliance rates at the time of initial audit were comparable to the previous year (52%).

Progress: There was impressive improvement in closing non-compliances between initial and follow-up audits. Contractors closed 46% of non-compliances in 2018 in comparison to only 6% in the previous year. This improvement is in part due to the implementation of a new breakthrough in the repayment of recruitment fees (the SC's Universal Reimbursement Scheme), putting the burden of proof on contractors. The SC reports⁶ that 15,100 workers on SC sites and 16,500 non-SC workers will receive reimbursement. A total of 134 contractors are participating in the scheme and have pledged to repay a total of USD 22.2 million, an average of USD 703 per worker.

- **Working hours, rest and leave:**

The Challenge: Working hours remains a challenging issue. Contractors' operational pressures⁷ combine with workers' desire to maximise their income, resulting in overtime up to legal limits being the norm.

Progress: Contractors have made better progress this year in closing working hours issues (58% of issues closed versus 28% in 2017). Mindful of operational issues, particularly in the run-up to completion, the SC has conducted research to determine how other markets have tackled this issue while safeguarding workers' health and safety. The SC is in consultation with industry experts and civil society groups, and aims to move this issue forward during 2019.

- **Wages and allowances:**

The Challenge: The area of wages and allowances is proving challenging for contractors and provides an opportunity for the SC to focus on further compliance efforts.

Progress: While the government finalises its review of the permanent minimum wage with the ILO, the SC went above and beyond legal compliance by collaborating with MOADLSA to issue a letter requiring contractors to adhere to the temporary minimum wage from December 2018. From the six follow-up audits conducted after this date, Impactt found that two contractors had implemented the minimum wage, including one contractor that had increased wages for its entire workforce in Qatar, including for non-SC workers. The SC is collaborating with MOADLSA on compliance issues, reporting non-compliant contractors so that MOADSLA can take action to enforce compliance.

⁶ Impactt has verified that these reimbursements are being made.

⁷ Time and operational pressures are common for construction projects; KPMG (2015) 'Climbing the curve: 2015 Global Construction Project Owner's Survey': <https://assets.kpmg/content/dam/kpmg/pdf/2015/04/global-construction-survey-2015.pdf>

Conclusions and recommendations

Overall, the SC has been successful in driving compliance in 2018, with the average overall compliance score reaching 89% after follow-up. In particular, great progress has been made on the challenging area of recruitment fees and this should remain a priority area for next year (2019). The SC has an opportunity to bring the same level of focus to the areas of working hours and wages as it has exercised on recruitment fees.

Impactt makes the following recommendations for 2019.

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

- **Recruitment fees:**

Remediation: Continue rolling out the Universal Reimbursement Scheme, ensuring that workers fully understand what the payment is for and that payments will continue (or be paid out in full) in cases of resignation, termination or transfer to a non-SC project.

Prevention: Study successful examples of low/zero fee recruitment from Qatar and beyond, and encourage contractors to seek more ethical recruitment channels.

- **Working hours:** Increase efforts on enforcing compliance with national law, focusing in particular on preventing the most extreme cases of working hours and consecutive days without rest. Where contractors lack effective monitoring systems, support them to better track and manage working hours.
- **Communication:** Focus on quality of management-worker communications, ensuring that pre-departure, on-boarding and workplace communication processes are effective.
- **Food and nutrition⁸:** Implement the lessons learnt from the Weill Cornell Medicine – Qatar (WCM-Q) pilot across construction sites and measure impact through worker feedback. Continue collaborating with industry and relevant stakeholders to understand the links between nutrition and good health.

Pillar 2: Prompt behaviour change in manager-worker interaction

- **Amplify workers' voices:** Continue with the worker satisfaction surveys begun in 2018, and track impacts of the SC's programme on workers' experience.
- **SC Grievance Hotline:** Publish aggregate statistics from various grievance mechanisms, including the SC Grievance Hotline and WWFs.
- **WWF:** Roll out planned BWI and QISC training for worker representatives, focusing specifically on communication, problem-solving and negotiation skills, as well as multi-cultural interaction.
- **Build worker skills:** Assess the effectiveness of skills training by measuring the impact on workers' skills and welfare.

8 This activity indirectly contributes to achieving the pillar recommendations

Pillar 3: Collaborate for greater reach and impact

- **MOADLSA:** Continue collaborating with MOADLSA and the ILO to exchange best practice and identify ways in which the WW Standards can be introduced to national legislation. Focus on ensuring that the SC's experience is incorporated into national best practice.
- **SC-BWI JWG:** Continue collaborating with the BWI to carry out site inspections. Where possible, leverage the BWI's expertise to help upskill workers (e.g. for worker representatives in WWFs).
- **Multi-stakeholder forums:** Engage with government and the ILO TCP to build a legacy on the reimbursement of recruitment fees, and participate in government-to-government conversations on source country practices.
- **International leadership groups:** Continue playing a leading role in such groups to exchange best practice and solidify the SC's legacy. Engage with stakeholders in the space of mega sporting events as well as other sectors.



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 a Principal Consultant. 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.

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Bernard is a Senior Consultant and joined Impactt in September 2016. He has a background in project management and research and analysis in the areas of Ethical Trade and International Development. Bernard has an MA in International Development and has previously worked for Oxfam and the United Nations Development Programme.

Barbara Dirnberger

Barbara is a 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 Project Officer 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 third Annual Report presents the results of our independent external monitoring of the SC's Workers' Welfare Programme.

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

After winning the bid to host the 2022 FIFA World Cup Qatar™ (the Tournament), the State of Qatar established the SC in 2011. The SC is responsible for delivering the competition venues and tournament-related facilities, together with host country planning and operations required for the hosting of the Tournament. Nearly 344 construction (and ancillary service) companies and 27,500 workers⁹ fall under the remit of the SC.

To protect workers' health, wellbeing, safety and security, the SC seeks to both uphold the WW Standards¹⁰ and engage in beyond compliance activities.

The WW Standards cover all aspects of a worker's journey from recruitment to repatriation. The SC implements a four-tier auditing system against the Standards, comprised of contractors' self-audits (first party), SC audits (second party), External Monitor audits (third party), and inspections conducted by the Ministry of Administrative Development, Labour and Social Affairs (MOADLSA).¹¹ The SC's audit and inspection regime is complemented by health and safety inspections conducted jointly by the SC-Building and Wood Workers' International (BWI) Joint Working Group.

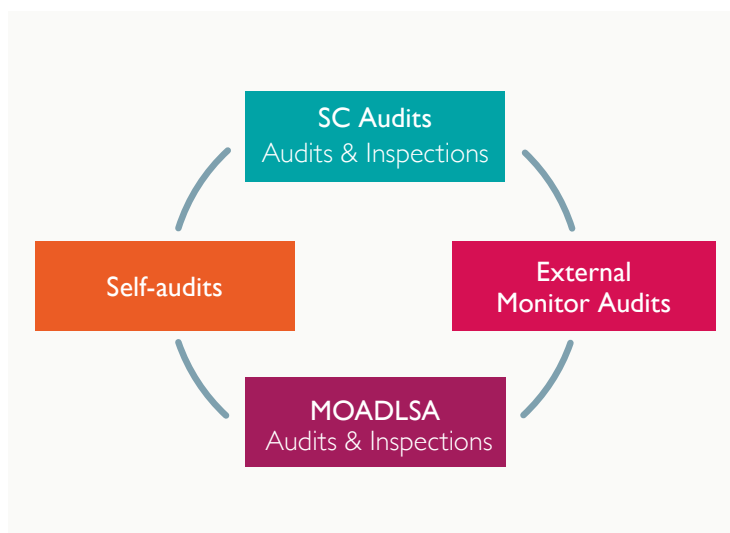


Figure 1: SC four-tier audit system

This system delivers a very high level 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 third party audits and joint inspections by the BWI are published annually.¹²

⁹ Data obtained from the SC, January 2019.

¹⁰ 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).

¹¹ MOADLSA audits follow Qatari labour law rather than the WW Standards.

¹² All reports are available on the SC's website: <https://www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency>, accessed 14 February 2019.

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.

Impactt's mission is to help improve the lives of 6 million workers in global supply chains by 2020 by developing win-win solutions that work for businesses and workers, harnessing the power of supply chains for positive change. Since 2006, Impactt has reached some 1.8m workers.

Impactt's global teams draw on both ethical and commercial expertise, and 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.

The 2017 Annual Report

In our first Annual Report¹³, 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 Report¹⁴ (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 of main contractors.
- Ending the practice of passport retention.
- Supporting contractors to transfer workers to high quality accommodation.

Impactt made the following recommendations to the SC to build on these gains:

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

- Support contractors in improving communication with workers, particularly before arrival and during the on-boarding process, so that workers fully understand their rights and the nature of their jobs.
- Leveraging the data provided by the workforce management system, analyse the root causes of excessive working hours and develop a process to manage unavoidable peaks in working hours, taking into account international law and good practices.

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

¹⁴ <https://impacttlimited.com/wp-content/uploads/2018/03/SC-Annual-Report-2018-Issue-6.2-digital.pdf>

Pillar 2: Prompt behaviour change in manager-worker interaction

- Work with contractors to upskill people managers (middle managers, supervisors and foremen).
- Leverage the BWI's experience to build the skills of worker representatives in WWFs.
- Publish grievances raised to the SC Grievance Hotline and actions taken (anonymised).

Pillar 3: Collaborate for greater reach and impact

- Work within existing initiatives to identify solutions to improve the recruitment process in workers' home countries, including finding ways to assess the recruitment practices of agents and sub-agents.
- Continue to engage with international groups at leadership and practitioner levels.

The 2019 Annual Report

This third Annual Report sets out Impactt's findings from audits conducted during the period January 2018 – January 2019, reports on Roadmap progress, and makes recommendations for further refinements of the SC's programme.

Context

It is important to understand the context in which the SC operates, as a government agency tasked with delivering the Tournament infrastructure and as a distinct body from the State of Qatar.

Challenges

The SC's work is taking place in a demanding context, characterised by the following challenges:

- A rapidly expanding workforce at SC projects: In 2018, the number of workers at SC projects increased by 50% to 27,500, up from 18,500 in December 2017. The SC expects this number to peak in 2019 at approximately 30,000. This, in turn, increases the demand on SC resources. Additionally, as the SC extends the scope of its compliance programme beyond measuring contractors' performance to supporting improvements, its resources will be further stretched. Greater numbers of workers could also increase costs for contractors, as compliance with WW Standards typically represents an additional cost, particularly in areas where the Standards go beyond local industry practices.
- Short active period: On average, subcontractors spend 6-7 months working on an SC project before their work is completed. This gives them limited time to adapt their operations to achieve improved compliance with the WW Standards.
- First mover: The SC is a first mover in implementing a Workers' Welfare Programme of this magnitude in Qatar. The SC's programme goes well beyond legal requirements and industry norms in terms of requiring the reimbursement of recruitment fees without receipts, establishing elected Workers' Welfare Forums (WWFs) and providing

annual flights home, as well as more stringent accommodation and transportation requirements. The programme is also a first mover in terms of audit intensity, independent monitoring and transparency.

- Medical requirements: The SC faced the challenge of lack of availability and poor delivery of pre-departure Gulf Approved Medical Centres Association (GAMCA) medical screening for workers. The SC appointed QRC to conduct comprehensive medical screening for all 27,500 workers who had not previously undergone comprehensive health screening.

Changes in national law

In 2018, the State of Qatar continued to introduce labour law and regulatory reforms concerning migrant workers.

The key changes introduced in 2018 were:

- Ratification of the International Covenant on Civil and Political Rights (ICCPR) and International Covenant on Economic, Social and Cultural Rights (ICESCR), two treaties that underpin international human rights law. This is a significant step forward in reducing the gap between national and international labour law, particularly with regards to freedom of movement and workers' freedom to accept jobs. Gaps persist in areas such as freedom of association and collective bargaining, as migrant workers in Qatar are unable to form trade unions.
- Creation of a Minimum Wage Commission in September 2018 to identify a permanent minimum wage. This followed the setting of a temporary minimum wage of QAR 750 in November 2017, in force for new employment contracts while the Commission conducts its work.
- Enactment of Law 13 in September 2018, which introduced changes to the use of exit permits. Workers covered by this labour law are now able to leave the country without having to obtain a permit from their employer.
- Qatar Visa Centres (QVC) have been established in several workers' home countries (including Sri Lanka, Pakistan and Bangladesh) to facilitate pre-departure medical checks, reduce the manipulation of contracts and protect workers' rights.
- Establishment of Labour Disputes Settlement Committee in March 2018. The Committee is chaired by a judge and will resolve disputes that MOADLSA's Department of Labor Relations cannot resolve amicably. The Committee improves access to justice for workers by providing a faster way to settle labour disputes.
- Establishment of the Workers' Support and Insurance Fund in October through Law 17 of 2018. The fund will protect workers by paying any amounts owed to them by employers, as decided by the Labour Dispute Settlement Committees.

The Technical Cooperation Agreement¹⁵ between the State of Qatar and the ILO commenced in January 2018.

¹⁵ This agreement aims to ensure compliance with ratified international labour Conventions (as defined by the ILO), and help achieve incremental progress on upholding fundamental principles and rights at work in the State of Qatar during the period 2018–20.

Stakeholder views

The work of the SC is the subject of considerable international interest. Overall, stakeholders continue to acknowledge that the SC is taking the lead in promoting worker welfare on its own projects. They call for the SC's good practices to be extended beyond the remit of the SC to non-SC projects such as public utilities, transportation and the construction of hotels and villas.¹⁶

Civil society organisations have also welcomed the progress made by the State through its Technical Cooperation Agreement with the ILO and the changes it has introduced to labour laws. In particular, stakeholders valued the removal of exit permits for the majority of migrant workers, and the establishment of the Workers' Support and Insurance Fund and Labour Disputes Settlement Committee.¹⁷

Stakeholders continued to highlight concerns related to the general welfare of migrant workers across the region as a whole. In particular, civil society organisations highlighted concerns about delays or non-payment of wages due to employers' cash flow problems,¹⁸ the low level of salaries for blue collar workers¹⁹ and the need to understand the root causes of non-work-related deaths.²⁰



¹⁶ Human Rights Watch, <https://www.hrw.org/news/2017/09/27/qatar-take-urgent-action-protect-construction-workers>. Also FIFA's Human Rights Advisory Board, <https://www.business-humanrights.org/en/fifa-human-rights-advisory-board-conducts-site-visit-to-qatar-highlights-progress-ongoing-challenges>.

¹⁷ Amnesty, HRW and FIFA's Human Rights Advisory Board

¹⁸ Engineers Against Poverty, <https://www.business-humanrights.org/en/analysis-cash-flow-problems-cause-late-payment-in-the-gulf-construction-sector-preventive-action-required-by-governments-clients-and-contractors>.

¹⁹ The Guardian, <https://www.theguardian.com/football/2018/nov/21/qatar-2022-40-a-week-to-build-the-world-cup-stadiums>.

²⁰ FIFA's Human Rights Advisory Board, <https://www.business-humanrights.org/en/fifa-human-rights-advisory-board-conducts-site-visit-to-qatar-highlights-progress-ongoing-challenges>.

Supreme Committee Workers' Welfare Programme

This chapter provides an overview of the SC Workers' Welfare Programme's key milestones since 2016 and how the programme has evolved in 2018.

Key programme milestones

Key milestones in the development of the programme since 2016 are summarised in the timeline below (figure 2).



Figure 2: Timeline of the SC Workers' Welfare Programme evolution since 2016

Evolution of the SC's worker welfare activities

In 2018, the SC made further progress in evolving its worker welfare activities. In particular, it strengthened its collaboration with MOADLSA in the following ways:

- Hiring a stakeholder outreach manager to lead on government liaison.
- Conducting a joint study with MOADLSA and the ILO on the SC's work on WWFs at ten contractors, which will be used for best practice that can be proposed for Joint Workers' Committees amongst companies in Qatar.
- Participating in several subcommittees administered by the MOADLSA and the ILO. The WWD Executive Director sits on the MOADLSA steering group to coordinate the actions and requirements arising from the Technical Cooperation Agreement with the ILO.
- Taking the lead on compliance with the new, temporary, national minimum wage among SC contractors.
- Strengthening the enforcement loop by sharing intelligence on contractor non-compliance to inform MOADSLA's enforcement efforts, which include labour inspections and eventual blocking of contractors' operations in the case of persistent non-compliance.

Additionally, the SC further strengthened its collaboration with contractors by:

- Continuing to hold Programme Welfare Forums (PWF) for main contractors to discuss priority issues and exchange best practice, in line with a requirement of the WW Standard (17.1).
- Convening 36 PWWFs meetings at 4 sites to discuss workers' welfare issues directly with each project's main contractor(s).
- Launching Bulletin 1 in February 2018. This comprises revisions and additions to the WW Standards including:
 - Mandating the pre-mobilisation approval process.
 - Strengthening the position of WWOs.
 - Introducing the requirement for pre-departure and pre-deployment health screening of workers to identify any pre-existing conditions.



Roadmap

The tables below (1, 2 and 3) provide an overview of the 2018 activities reported by the SC, arranged by roadmap pillar:

Table 1: Roadmap update: Pillar

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

Direct efforts

Ensure that contractors, rather than workers, pay the cost of recruitment:

- Rollout of the SC's Universal Reimbursement Scheme, which is set to reach 15,100 SC workers and 16,500 non-SC workers across 134 contractors over the course of three years. Contractors have pledged to repay USD 22.2 million.

Support contractors in improving the effectiveness of their due diligence processes:

- The SC delivered training for 412 Workers' Welfare Officers (WWO) and Programme Workers' Welfare Officers (PWWO).
- The SC convened 36 Project Welfare Forums (PWWF) meetings at 4 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 rejected 12% of subcontractor mobilisation requests²¹ due to issues related to worker welfare.

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 meeting in January 2019 was attended by 30 contractors (primarily main contractors) and featured presentations by the SC (on topics such as health screening) and by contractors, including one contractor that presented its ethical recruitment pilot project with MOADLSA and the ILO. MOADLSA and the ILO are conducting a study on ethical recruitment processes, which will be used to encourage contractors to commit to ethical recruitment.

Build contractors' capacity to develop and implement improvements within their own operations:

- Main contractors are conducting bi-monthly WW stakeholder meetings with their subcontractors to brainstorm and share challenges, benchmarking and key initiatives.
- The SC initiated quarterly surveys with subcontractors to seek feedback on support required from the SC and main contractors, as well as improve understanding on the SC WW Standards.

Indirect efforts²²

- Joint Working Group with the BWI (JWG): The JWG carried out 7 inspections of construction and accommodation sites, and published its first report with findings and recommendations in January 2018.
- Accommodation: As of December 2018, 98% of workers at SC projects were housed in 18 highly compliant accommodation sites.
- The SC worked with contractors to conduct emergency medical drills at all construction sites and all accommodation sites with over 100 workers.
- The SC launched the 'Sadiqi' app in June 2018 to help workers improve their personal and work life.
- The SC conducted health screening in partnership with the Qatar Red Crescent (QRC). As of December 2018, 6,565 workers had been screened (24% of the total workforce).

²¹ Since January 2017.

²² These activities indirectly contribute to achieving the pillar recommendations

Pillar 2: Prompt behaviour change in manager-worker interaction

Direct efforts

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 December 2018, the SC has received 274 complaints or grievances from workers, of which 254 (93%) have been resolved and 20 are under investigation.
- 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 10% of the workforce). The findings of this survey will form the baseline for future biannual surveys.

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

- As of December 2018, there are 112 active WWFs covering over 22,200 of workers (81% of the workforce)
- Elections have been conducted covering 55 contractors and 14,500 workers. The average election turnover was 84%.

Build management skills:

- The SC partnered with leading health and safety training provider the Qatar International Safety Centre (QISC) to upskill supervisors and medical staff: 92 medical staff undertook training on occupational H&S, 196 medical staff and WWOs undertook training on medical requirements training, and 167 medical staff undertook training on basic and advanced life support.

Build worker skills:

- The QISC delivered H&S training to 5,590 workers and worker welfare induction for 6,155 workers.

Indirect efforts²³

- In collaboration with Qatar Stars League, the SC continues to run the Workers' Cup – an annual football tournament for workers.

²³ This activity indirectly contributes to achieving the pillar recommendations

Pillar 3: Collaborate for greater reach and impact

Direct efforts

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

- The SC continued to strengthen its relationship with MOADLSA by helping to ensure that contractors comply with Qatari Labour Law. To date, the SC has referred 88 contractors to MOADLSA for further inspection and follow-up. This includes 50 contractors that were reported for not implementing the temporary minimum wage.
- Participating in several subcommittees administered by MOADLSA and the ILO. The WWD Executive Director sits on the MOADLSA steering group to coordinate the actions and requirements arising from the Technical Cooperation Agreement with the ILO.
- The SC circulated a 'whitelist' of recruitment agents among its contractors.
- The SC continued to play an active role in bi-monthly Karama meetings, which are attended by 18 major companies and organisations seeking to tackle workers' welfare issues in Qatar.
- The SC has actively participated in several international fora and events.²⁴

Indirect efforts²⁵

- The SC renewed its Collaboration Agreement with BWI for another year.
- Nutrition programme: Together with Weill Cornell Medicine - Qatar, the SC completed the first year of its nutrition programme. This consisted of health assessments for over 1,000 workers, health and nutrition training, awareness campaigns for workers and catering contractors, and the development of enhanced menus, which will be rolled out across canteens in 2019.
- The SC is collaborating with the Ministry of Municipality and Environment (MME) to conduct joint food safety and quality inspections. This will start after the first strategy meeting in March 2019. The SC and MME will continue to collaborate to enforce food safety across the programme.
- Cooling technologies (in collaboration with TechNiche): The SC distributed 3,500 cooling vests to workers at six construction sites. The vests demonstrably lowered workers' body temperature by 8-10 degrees centigrade. The SC also designed a bespoke cooling workwear product and is planning to roll it out to all workers in 2019.
- Remittance: The SC collaborated with Ooredoo and the Commercial Bank of Qatar to give workers access to an automated remittance app.

²⁴ For example: Innovation Forum (March 2017), UN Human Rights Forum (November 2018), NYU Stern Ethical Recruitment (September 2018), Qatar Chamber/ IHRB Human Rights Conference (October 2018).

²⁵ These activities indirectly contribute to achieving the pillar recommendations

Impactt's external compliance monitoring programme

Scope of Impactt's work

The scope of Impactt's monitoring covers all contractors across all contracting tiers, working at SC competition and non-competition venues. 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.²⁶

Since 2016, Impactt has conducted initial and follow-up audits of 43 contractors (12.5% of the total number of contractors as of January 2019). Impactt selected which contractors to audit, when to audit them, and which workers to interview, independent of the SC. Impactt's audits are structured following the worker journey (see Appendix I for a description of topic areas).

In 2018, Impactt conducted three-day initial audits of 6 contractors every quarter, and two-day follow-up audits at each contractor in the quarter following the initial audit – a total of 24 initial and 24 follow-up audits. Every audit involved a two or three-person team consisting of a lead auditor(s) and a dedicated worker interviewer. This represents a total of 334 person days in the field. In comparison with 2016 and 2017, this increase in personnel and other refinements in the audit process have enabled the team to delve deeper into worker welfare issues.

The 2019 Annual Report covers findings from five visits:

Date of visit	Audits conducted
January 2018	6 initial audits
April 2018	6 initial audits and 6 follow-up audits
July 2018	6 initial audits and 6 follow-up audits
October 2018	6 initial audits and 6 follow-up audits
January 2019	6 follow-up audits

Table 4: Audit visits to Qatar

Appendix 2 provides further detail on Impactt's audit approach.

²⁶ 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.



Figure 3: Impactt sample

Worker interviews

During 2018, Impactt interviewed 1,109 workers to monitor compliance and gauge worker satisfaction. Worker interviews are conducted by dedicated worker interviewers, usually in the worker's mother tongue. In preparation for each audit, Impactt asked selected contractors to provide a complete list of their workers at SC projects. Impactt selected a sample of workers for interview, ensuring a cross-section of nationalities, job types and lengths of service. Impactt conducted group and individual interviews at the workers' accommodation to allow workers to speak freely, confidentially and away from managers. In addition, Impactt conducted spontaneous, informal interviews with other workers. Impactt completed all the interviews without the contractors' or the SC's involvement.

See Appendix 3 for a detailed breakdown of worker nationalities.

Cooperation during the audit

In 46 of 48 audits conducted in 2018, contractors were cooperative with Impactt, providing all documents requested and not interfering with the audit in any way. However, for the first time, there was one instance of a contractor providing inaccurate records and another where Impactt found evidence of worker coaching. This type of

²⁷ Impactt and the SC categorise the sites differently. The SC factors in the stage of construction (e.g. demolition) when categorising, whereas Impactt does not. Based on Impactt's categorisation, there are 13 sites.

attempt to 'game the system' is a widely documented and unfortunate unintended consequence of auditing regimes. In both cases, Impactt was able to uncover the real situation, and the issue did not recur at follow-up.

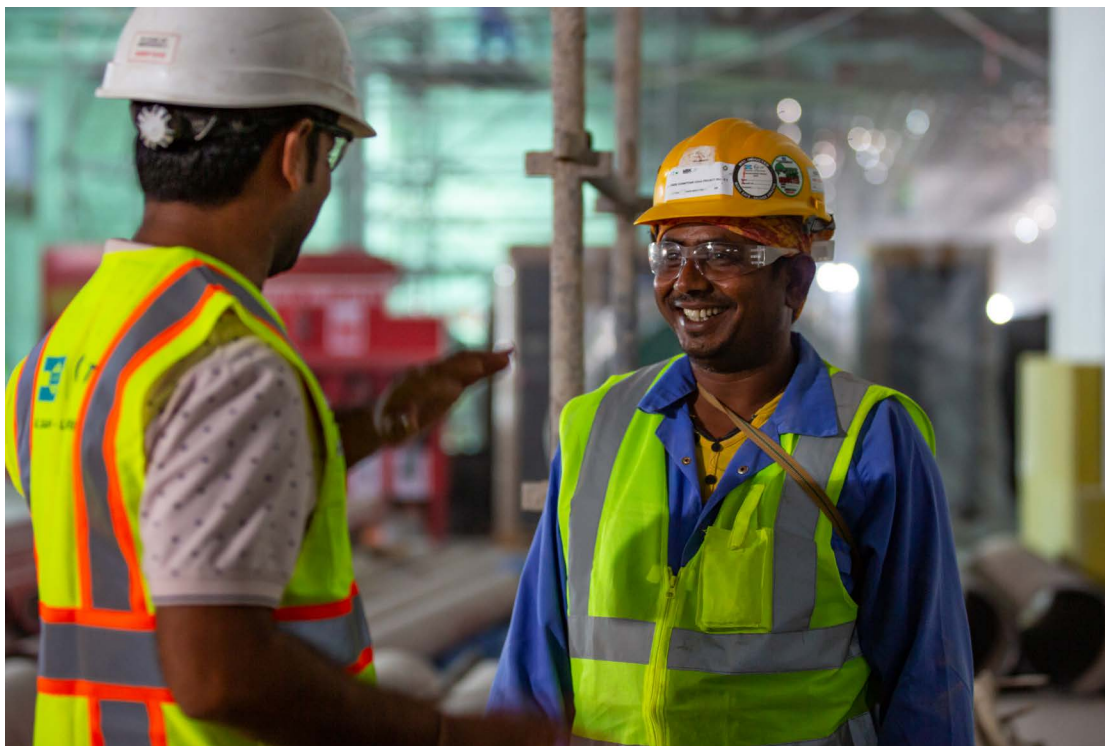
Worker satisfaction and socio-economic survey

In addition to the standard audit worker interviews, Impactt conducted worker satisfaction and socio-economic surveys among 1,058 workers. The purpose of the worker satisfaction survey is to measure the extent to which workers are satisfied with their employer and workplace, while the socio-economic survey is designed to capture additional insight into the 'push and pull' factors that shape the workers' journeys as migrant workers.

Focus groups on recruitment fees

To gain a relevant and timely insight into current recruitment procedures, Impactt interviewed and surveyed focus groups of new workers directly recruited to SC projects. In 2018, Impactt surveyed 229 workers who had been recruited directly for SC projects within the 12 months prior to the audit date, across 22 contractors²⁸. Impactt asked them specifically about recruitment and recruitment costs.

The results of these surveys are incorporated in the findings section below.



²⁸ Two out of the 24 contractors audited in 2018 did not recruit any new workers in the 12 months before the audit.

Findings

This section sets out the overall results of Impactt's assessment of 24 contractors during the period January 2018 – January 2019 and additional verification activities. The glossary of terms (see page 3) contains descriptions of the compliance terminology used below.

Compliance findings²⁹

Table 5 summarises the compliance results of the 2018 audits. The findings are organised by audit section, following the worker's journey. Each audit section contains a number of topic areas, as well as requirements of the SC WW Standards or Qatari law.

Table 5: Summary of Impactt's audit findings

Topic area	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Due diligence	68%	93%	84%
Treatment	71%	93%	77%
Recruitment fees	46%	67%	46%
Contracts and administration	52%	78%	66%
Induction	72%	87%	58%
Personal documents	89%	98%	80%
Working conditions (H&S)	71%	84%	52%
Wages and allowances	64%	78%	46%
Working hours, rest and leave	59%	75%	58%
Disciplinary procedures	57%	70%	41%
Accommodation and food	84%	91%	46%
Transportation	86%	95%	69%
Grievance mechanisms	60%	88%	67%
Worker representation	77%	98%	87%
End of service procedures	79%	89%	57%
Overall	75%	89%	56%

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

²⁹ 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.

The average overall initial audit compliance rate across the 24 contractors audited in 2018 was 75%. By the time of the follow-up audits, scores had increased to 89% overall (table 5).

During initial audits, average compliance was high in the areas of personal documents (which includes workers being in possession of their passports), transportation, accommodation and food, worker representation and induction.

Considering overall progress in 2018 (where contractors have either been able to close out an issue completely or make progress towards doing so), Impactt found that contractors had been able to close out or make progress on 71% of issues.³⁰ This is a significant improvement on the previous year (58%). Compliance rates after follow-up audits were equal to or above 76% in all areas except recruitment fees (67%) and disciplinary procedures (70%). This increase in pace is particularly notable in the closure of the more serious issues. In 2018 contractors either closed or made progress on 100% of critical non-compliances and 88% of critical observations, in comparison to 45% and 36% in the previous year (see table 6).

Table 6: Overall follow-up improvement by year

	Audits in 2017		Audits in 2018	
	Issues raised (#)	Closed & progress made (%)	Issues raised (#)	Closed & progress made (%)
Critical NCs	22	36%	18	100%
Major NCs	146	51%	269	74%
Minor NCs	415	62%	778	69%
Total NCs	583	58%	1,065	70%
Critical OBs	17	35%	17	88%
Total OBs	150	57%	283	75%
Total issues	733	57%	1,348	71%
Total critical issues	39	36%	35	94%

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

The increased pace of remediation is largely due to the following reasons:

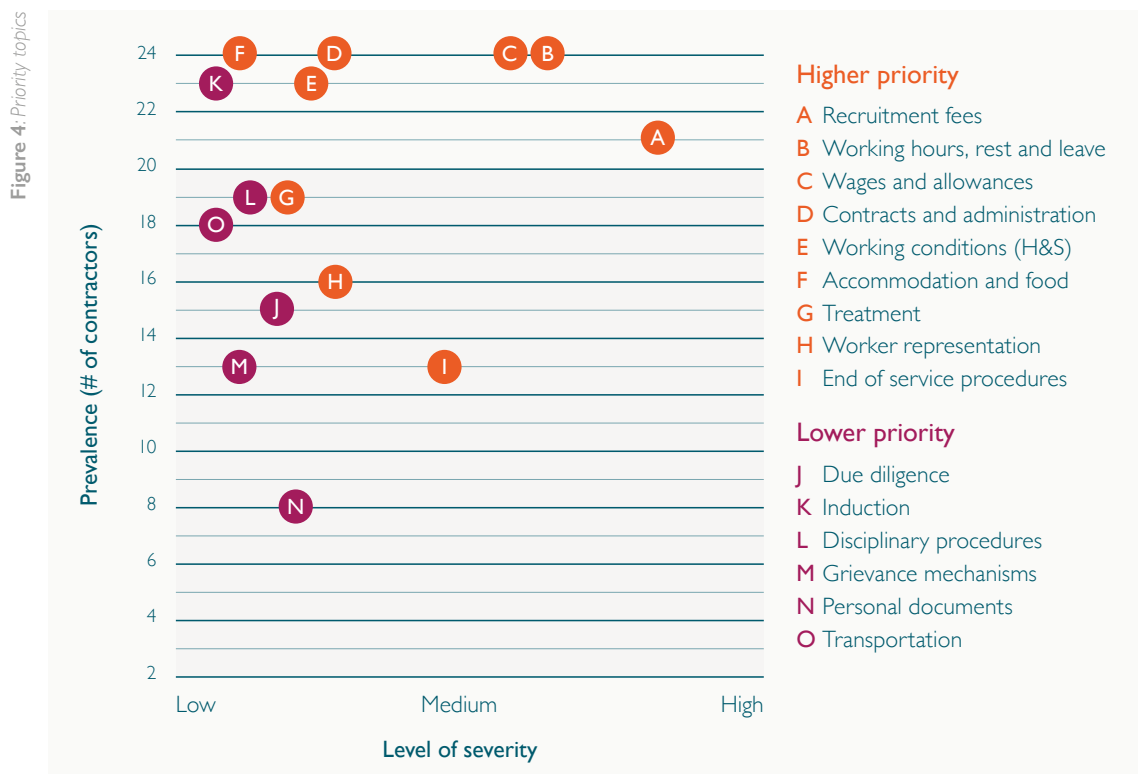
- The SC is taking an increasingly interventionist approach, in which it engages with and supports subcontractors directly to improve their compliance performance, rather than relying on contractors to pass the message down the supply chain.

³⁰ This excluded issues that could not be verified or where the contractor was 'unable to show improvement' 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.

- The SC has identified and communicated solutions to complex issues that were previously going unresolved. For instance, to address the challenge of providing annual air tickets home, which is a complex issue given that many workers move on and off of SC projects within a year, the SC requires contractors to provide workers with a monthly allowance that over the course of 12 months equates to the cost of a return flight home.
- The SC has made great strides in rolling out the repayment of recruitment fees.
- The SC is making use of Impactt's compliance data to put additional leverage on contractors to meet compliance requirements.
- Contractors have a better understanding of compliance requirements. This is driven by engagement between the SC and mid- and senior-level management of contractors, as well as company-to-company engagement through PWF meetings.
- Contractors have more capacity to drive compliance in the form of dedicated personnel (WWO) assigned to lead on compliance with the WW Standards. By the time of Impactt's follow-up audit, all audited contractors had assigned a WWO.

Compliance by topic area

We have identified nine priority topics based on an analysis of the severity³¹ and prevalence³² of the issues. These are highlighted in pink in the graph below (Figure 4). The next sections provide more detail on each of the priority topics.



³¹ The severity level is calculated using the number of critical, major and minor non-compliances, and critical observations. Severity relates to the level of risk to workers or the size of the gap between current practice and legal or WW Standards requirements.

³² Prevalence refers to the number of contractors identified as having an issue in a particular topic area.

A. Recruitment fees

WW Standards requirements

The WW Standards requires contractors to:

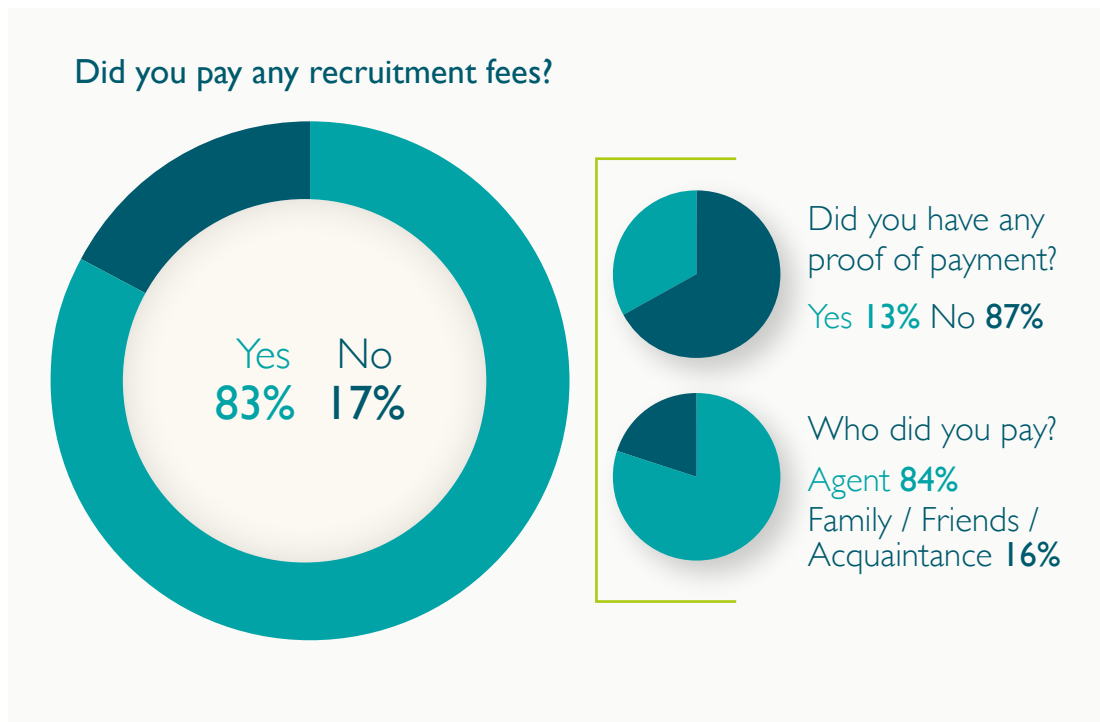
- Reimburse workers for recruitment or processing fees if the worker is able to provide proof that they have paid such fees (WW Standards 6.9).
- Stipulate that the contractor is responsible for paying all recruitment and processing fees in their contracts with recruitment agents (WW Standards 6.4).
- Complete a checklist with new workers, covering whether they paid any recruitment fees (WW Standards 6.10).

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Recruitment fees	46%	67%	46%

Of the 857 workers surveyed in 2018, 711 (83%) reported paying recruitment fees, the same proportion as in 2017. While this sample includes workers who were recruited for non-SC projects or not directly from their home country, the results are similar for workers recruited directly for SC projects. In a sample of 181 newly recruited workers for SC projects in 2018, 83% reported having paid recruitment fees. Of these workers, 84% had paid an agent and 87% did not have receipts.

Figure 5: Recruitment fees paid by workers



Overall, the workers interviewed paid an average of 4,713 QAR (USD 1,273). This is comparable to estimates of the cost of recruitment compiled by the ILO.³³

Workers from Bangladesh³⁴ report paying the highest costs of recruitment, QAR 4,322 (USD 1,167). On average, across all nationalities, the fee paid by workers, according to workers' testimonies, has reduced slightly from USD 1,248 in 2017 to USD 1,244 in 2018.

Impactt found issues related to recruitment fees at all 24 contractors audited. Compliance rates at the time of our initial audits were comparable to the previous year (52%). However, there was significant improvement in closing non-compliances. Contractors closed 46% of non-compliances in 2018, in comparison to only 6% in the previous year, resulting in a marked improvement in compliance rates at follow-up audit (67% in 2018 versus 53% in 2017). This improvement is in part due to the implementation of a new methodology for repayment of recruitment fees (the SC's Universal Reimbursement Scheme) when workers do not have receipts.

Impactt identified the following non-compliances during the year:

- At two contractors, Impactt identified isolated cases of workers who had paid fees and had proof of payment: one paid QAR 3,650 (USD 1,003) and the other QAR 2,685 (USD 738), which the contractor had not reimbursed. At the follow-up audit, both contractors had reimbursed the workers. However, only one of the contractors was able to close the issue. At the other contractor, Impactt identified a further case.
- Nine contractors did not ask all workers (existing and new) whether they had paid any recruitment fees. At the follow-up audit, Impactt found that two had conducted interviews with their existing workforce to identify if they paid fees, meaning two non-compliances were closed (21%). Of the remaining seven, two remained open (21%) as no action was taken, and five were marked as 'progress made' (56%), as contractors either only asked some workers or did not ask workers in an effective manner (e.g. by not documenting the process).
- 16 contractors either used a recruitment agent(s) that was not registered with MOADSLA³⁵ or had inadequate agreements with a recruitment agent(s), omitting content prescribed by the WW Standards (e.g. stating that the agent would not charge any fees to the worker). Nine out of 16 contractors (56%) revised their agreements with the recruitment agencies or sought new agreements with agents that were registered. In the remaining cases, the contractor had either not terminated its agreement with the non-registered agent or had not updated its agreements with the required clauses at the time of follow-up.
- Impactt raised an observation³⁶ at 8 contractors where workers reported paying fees but did not have proof. The observations were closed where contractors implemented the Universal Reimbursement Scheme and met two key criteria: all workers who

33 R. Jureidini (2016) 'Ways forward in the recruitment of low-skilled migrant workers in the Asia-Arab States corridor: ILO white paper, http://www.ilo.org/wcmsp5/groups/public/-arabstates/-ro-beirut/documents/publication/wcms_519913.pdf last accessed 14 February 2018.

34 Impactt interviewed 16 workers from Vietnam who reported paying a high amount in recruitment fees (QAR 3,554; USD 960). As these workers represent a small sample size, this data has been excluded from the report. This requires further investigation.

35 The WW Standards require contractors to be registered with MOADSLA and to have agreements with recruitment agents clearly stating that the contractor will be charged for all recruitment or processing fees.

36 This is reported as an observation, rather than a non-compliance, since failure to repay recruitment fees when workers do not have receipts is not a direct breach of the WW Standards.

reported paying fees had started receiving the reimbursement and the amount received by workers matched the commitment made by managers. One contractor (13%) met these criteria and therefore the observation was closed. Where contractors implemented the scheme but did not meet these criteria, Impactt marked the issue as 'progress made'. This applied to 2 contractors (25%). The remaining 5 contractors (63%) had not implemented the scheme by the time of Impactt's follow-up audit.

The SC's Universal Reimbursement Scheme is a breakthrough in tackling the widespread issue of recruitment fees faced largely by workers from South and South East Asia migrating for work to other Asian countries and the Middle East. Recruitment fees are proving to be an intractable issue for many supply chains, and the SC's progress in this area is to be commended.

Launched in January 2018, the scheme provides a mechanism for contractors to reimburse workers who report having paid fees but do not have receipts and where the contractor is unable to demonstrate having covered all costs of recruitment. The SC's standard, which is contractually binding, says the contractor must have a written agreement with recruitment agents stipulating that "the contractor is responsible for the payment of all recruitment or processing fees relating to the recruitment of workers". Similarly, the agreement must "set out the amount of such fees and charges which the recruitment agent will charge the contractor for the recruitment of workers". Therefore, the contractual expectation defined by the SC is that contractors not only pay the costs of recruitment, but also pay the recruitment agents for their services.

Mindful of the need to balance repayment to workers with minimising the effect on contractors' cash flow, the Universal Reimbursement Scheme allows repayments to be made in monthly instalments. The amount repaid is based on a negotiation between the SC and the contractor. The agreement is contractually binding.

The SC reports that 15,100 workers on SC sites and 16,500 non-SC workers will receive reimbursement. 134 contractors are participating in the scheme and have pledged to repay a total of USD 22.2 million, an average of USD 703 per worker.

Impactt verified the operation of the scheme at a sample of 20 contractors and found that all these contractors had started making payments. Due to the negotiated nature of the scheme, there is a wide range of practice. Some contractors have been able to repay fees as a lump sum. Others have spread payment over 12 to 36 months. Amounts repaid range from QAR 900 (USD 244) to QAR 7,200 (USD 1,954). One main contractor has pledged to making repayments (QAR 1,800, USD 486 per month) to workers indefinitely.

Repayments are made as part of the monthly salary payment, and shown as a separate item on the payslip. At the beginning of the year, not all workers understood what this extra payment was for; however, in the subsequent months, 100% of workers at six contractors understood the scheme.

The SC verifies that payments continue to be made in case a worker leaves or is re-deployed. Any deviation from the pledge will be escalated to MOADLSA.

The Universal Reimbursement Scheme is effective in boosting workers' income and providing a direct recompense for fees paid. It is an important, practical tool for resolving an otherwise intractable problem and provides a model that other similar supply chains could follow.



B. 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).
- Overtime can be worked up to a maximum of 10 total hours of work per day and shall be compensated at a premium rate (Article 74).
- Workers shall not work more than two consecutive rest days, with the exception of shift workers (Article 75).
- Article 73 does not apply to cleaning and security workers (Article 76).

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Working hours, rest and leave	59%	75%	58%

Working hours remain a challenging issue. Operational pressures combine with workers' desire to maximise their income, resulting in overtime up to legal limits being the norm. Contractors have made better progress this year in closing working hours issues (58% vs 28%). There were two critical non-compliances related to working hours:

- At one contractor, a group of construction workers (up to 13% of the workforce) worked excessive hours. The highest case identified was 349 hours in one month. This issue was marked as 'progress made', as the contractor had eliminated all but one case of excessive hours.
- At another (catering) contractor, workers worked excessive hours during Ramadan. The most extreme case was 312 hours over the course of a month, worked by 5 of 10 workers in the sample (50%). This would be within legal limits outside of the month of Ramadan. During the follow-up, this issue was marked as 'unable to show improvement', as Ramadan had concluded, meaning the requirement was no longer applicable.

There were three critical non-compliances related to insufficient rest days.

- At one contractor, 4 workers (security guards) had worked for 363 consecutive days without a rest day. This issue was closed as the contractor's roster was amended to provide workers with 4 rest days per month.
- At two other contractors, workers worked less extreme, but still a critical number of consecutive days without rest. At one contractor, the most severe case was 98 consecutive days (security guards), and at another, it was 72 (catering staff). At both contractors, at least half of the workers in Impactt's sample did not receive sufficient rest days, indicating the issue was systemic. The contractors were able to resolve the issues and both non-compliances were closed.

Contractors were able to close a number of other issues:

- At 17 contractors, workers worked excessive hours (not as extreme as above, but still in excess of legal limits). Of these:
 - 1 was raised as a minor non-compliance as the cases were isolated.
 - 6 contractors where workers worked excessive hours during Ramadan.³⁷

Contractors were reasonably successful in closing or making progress on issues of excessive working hours (combined total 88%). Nine (53%) resolved the issue, as in the months preceding the follow-up audit, there were no cases of excessive hours.

³⁷ During the follow-up audit, these were marked as 'unable to show improvement', as Ramadan had concluded so the requirement was no longer applicable.

Six (35%) had made progress, as either fewer workers were working excessive hours or the number of hours had reduced. Two (12%) were unable to address the issue and working hours remained excessive. The cases of excessive hours during Ramadan were not followed-up on, as Ramadan had concluded by the time of the follow-up audit.

- At 10 contractors, workers did not receive sufficient rest days. Five (50%) resolved this issue, as in the months preceding the follow-up audit, all workers received sufficient rest days. Three (30%) had made progress, as the prevalence of insufficient rest days had decreased. Two (20%) were unable to address the issue, with workers still not receiving sufficient rest days.

Impactt raised critical observations related to workers being denied access to emergency and sick leave – 2 were closed and 1 was marked as 'progress made':

- One contractor required workers with fewer than six months of service to ask a colleague to stand as a guarantor when they go on emergency leave. The guarantor would risk a financial penalty if the other worker did not return from leave (as this had never happened, the exact amount of the penalty was not set). This issue was closed as the contractor stopped this practice and notified all workers, who reported understanding this change.
- One contractor imposed a QAR 600 (USD 165) deposit on workers who wanted to go on emergency leave. This issue was closed as the contractor refunded the deposits and ended this practice.
- At one contractor, workers were only able to get approval for sick leave by going to a public hospital (as opposed to getting approval from a clinic at their accommodation site). In one case, a worker reported having severe fever and not being able to work for 2-3 days; but as he was unable to travel to the hospital, he did not receive sick leave. During the follow-up audit, Impactt found that the doctor was authorised to approve sick leave and that managers had conducted an awareness session to notify workers. Despite these positive steps, Impactt found that the majority of workers were still not aware of the changes. As such, the issue was marked as 'progress made' and not closed.

Mindful of the pressures pertaining to work on construction sites, particularly in the run-up to completion, the SC has studied clause 6.5 of the Ethical Trading Initiative Base Code and conducted research to determine how other markets have tackled this issue, while helping to ensure that sufficient health and safety breaks are provided. The SC is also engaging with the BWI and aims to make progress on this issue in 2019.

C. Wages and allowances

WW Standards requirements

Qatar Labour Law and the WW Standards require contractors to:

- Pay overtime on a regular working day at a premium rate (Article 74).
- Pay workers on a rest day at a premium rate and provide a compensatory day off (Article 75).
- Provide workers with a flight home on an annual basis (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 minimum wage had not yet gone into effect. Therefore, the WW Standards go beyond national law.]

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Wages and allowances	64%	78%	46%

57% of workers interviewed reported that they earn enough to cover their family's needs, and 40% of workers said that they appreciate being paid on time. They reported that, having worked in the construction industry before, many of them do not take this for granted. Nevertheless, wages are a priority area for workers. 42% of workers cite low income as a reason for not recommending their job to friends or family.

The area of wages and allowances is proving challenging for contractors and provides an opportunity for the SC to focus further compliance efforts.

Impactt found critical non-compliances at two contractors. Both cases relate to contractors not paying workers the required overtime premiums.

- One contractor had not paid its workers any premium for daily overtime or overtime worked on a rest day or public holiday. This had been caused by an error in its payroll system, established several months prior. The contractor amended its payroll system and provided a total of QAR 55,000 (USD 15,110) in back pay to workers. Based on this, the issue was closed.
- One construction company was using a dual-payment system, contrary to Qatari law. Workers received a monthly wage (intended as an allowance) through the WPS in Qatar and were also paid annually in arrears in their home country based on a piece-rate model. Workers did not receive overtime premiums on this part of their pay. By the follow-up audit, the contractor had changed its payment model from piece-rate to the standard (basic plus overtime) model. The contractor has also calculated how much workers should have earned under the standard model, starting from the date on which they began working on the SC site. The contractor subsequently began paying back-pay in instalments through the WPS. The issue was marked as 'progress made' and not closed because the repayment of back pay had not been completed at the time of the audit. The payments were scheduled to be completed within two months after the follow-up audit.

Other issues found included:

- One contractor failed to pay workers on time for three consecutive months. The contractor reported that the root cause of the issue was cash flow problems. This issue was marked as 'progress made', as the contractor reduced the delay and paid the most recent month on time. Five contractors did not provide workers with payslips. Three of five contractors (60%) closed their non-compliance by providing payslips, whereas 2 did not (40%).
- Two contractors made errors when calculating workers' wages. One issue was closed, as the contractor moved to a digital payroll system, and the other remained open, as the contractor continued to experience discrepancies between time and pay records.
- 10 contractors were not entering accurate information into the WPS system (for example, by not entering all hours worked, or entering bonuses as time worked). Contractors struggled to address this non-compliance: three non-compliances were closed (30%) and seven remain open (70%). Contractors failing to address this issue cited restrictions of the WPS system (or incompatibilities between the WPS and their accounting system) as the main reason.
- One contractor paid part of workers' wages in cash. This issue was closed as they later made all payments through the WPS.
- Four contractors did not pay workers for time spent in training or inductions (usually amounting to 1-2 days of unpaid work). Contractors were successful in addressing these issues: three non-compliances (75%) were closed and one (25%) was marked as 'progress made', as the contractor amended its practice but did not provide back pay.
- Nine contractors failed to provide workers with a flight home each year (or cash equivalent). The majority of contractors addressed this issue: five non-compliances were closed (56%), one was marked as 'progress made' (11%) and three remained open (33%).

The SC has been working closely with MOADLSA on the implementation of the temporary national monthly minimum wage of QAR 750 (USD 206). While the government finalises its review of the permanent minimum wage with the ILO, the SC went above and beyond legal compliance by issuing a letter requiring contractors to adhere to the temporary minimum wage from December 2018. From the six follow-up audits conducted after this date, Impactt found that two contractors had implemented the minimum wage, including one contractor that increased wages for its entire workforce in Qatar, not only for SC workers. This included over 350 workers who were previously paid below the new temporary minimum wage. Contractors told Impactt that they welcomed the new minimum wage, in particular as it could help tackle what had become complicated bureaucracy surrounding the approval of demand letters.³⁸

³⁸ In order to recruit workers from countries such as Bangladesh and India, contractors had to gain approval from the relevant embassy in Doha to recruit workers. Approval was only granted if the letter stated it would provide wages in line with the minimum wages set by the departing countries.

D. Contracts and administration

WW Standards requirements

The WW Standards require contractors to provide workers with:

- An original offer of employment before they leave their home country, including information about their professional role, working hours, wages and entitlements, days off and holiday entitlements, and access to medical care (WW Standards 7.1). This must be in writing, in a language the worker understands (WW Standards 7.2), with a copy given to the worker (WW Standards 7.6).
- A contract on arrival in Qatar (WW Standards 8.1) that includes the relevant terms and benefits of employment (8.2b). All contracts must be signed and witnessed (8.2d), and their content must be explained to the worker in a language they understand (8.2c). Workers must be given a signed copy of their contract (WW Standards 8.5).

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Contracts and administration	52%	78%	66%

Impactt found issues at all contractors and non-compliances at 22 of 24 contractors, however, most of these are low in severity (73% rated as minor). Contractors were able to make significant strides in improving the situation, moving from an average 52% compliance rate at initial audit to 80% at follow-up and closing or making progress on 90% of issues.

Impactt identified one critical non-compliance:

- One contractor recruited 5 workers as carpenters. On arrival in Qatar, their roles changed to labourer and their monthly basic wage was reduced by QAR 100 (USD 27). Managers reported that they had always intended to hire labourers but that the offer letters stated 'carpenter' because that is the only category for which they could still obtain visas. During the follow-up audit, Impactt found that these workers were no longer working on this project. All other workers (still working on the site) were paid as per their contracts during the follow-up visit. In addition, the contractor committed to changing the format of their offer letters to make a clear distinction between visa category being used (for administrative purposes) and the worker's actual role. Based on this, the issue was marked as 'progress made'.

At another contractor, there was a similar mismatch between promised and actual wage:

- One worker, who did not receive an offer letter, was told by the recruitment agent that he would receive a basic salary of QAR 1,300 (USD 357). Upon arriving in Qatar, he signed an employment contract for QAR 1,100 (USD 302). During the follow-up audit, Impactt found that the contractor had taken some steps to investigate the issue,

including contacting the agent and reiterating their obligation to adhere to the WW Standards. The issue was marked as progress made.

Impactt also identified the following non-compliances regarding offer letters:

- At 14 contractors, workers did not receive a copy of their offer letter (or did not receive a copy pre-departure). Of these, eight (57%) were closed as the contractor issued offer letters to new recruits, and the remaining six (43%) were marked as 'progress made' or 'unable to show improvement' as there were no new recruits for the contractor to demonstrate compliance.

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.



Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Working conditions (H&S)	71%	84%	52%

Impactt's audit scope covers general health and safety management practices at accommodation and construction sites, including inductions for workers on health and safety.³⁹

The vast majority of workers (99%) reported feeling safe at work and 95% said that safety is treated as a high priority at their workplace. Compliance rates at follow-up reached 84%. We found no critical non-compliances, but did pinpoint two critical observations:

- At one contractor, workers reported being asked by the foreman to carry out tasks that went against H&S requirements (such as climbing a ladder without anyone holding it or working at a height without the required certificate). They reported that, if they refused, the foreman would warn them for not following orders. Workers reported feeling particularly afraid and uncomfortable with the foreman's orders, since there had been a death on this construction site. During the follow-up audit, Impactt found that this issue had not been addressed; workers reported the foreman was still asking them to carry out unsafe tasks and that they were still feeling uncomfortable. Both the SC and the contractor conducted further investigations. The SC's investigation confirmed these findings and is both working with the contractor to resolve the issue and conducting unannounced site inspections.
- At one contractor's accommodation site, workers reported that transport was not immediately arranged when they needed to go to the hospital. The contractor would wait until a bigger group needed to go and transport them together. In one case, this meant waiting for 2-3 days. This issue was automatically closed as the workers were moved to another accommodation site where medical facilities are provided on site.

At two contractors, Impactt raised a non-compliance related to workers having to pay for medical fees or transport fees to medical facilities in the range of QAR 1-100 (USD 1-27). Both non-compliances remained open as the fees were not reimbursed and the contractors' practices had not changed by the time of the follow-up audit.

The SC provides H&S training to workers through the QISC. Impactt observed a training session in January 2019. The training was conducted in English and there were 30 workers participating, from various nationalities and with varying degrees of proficiency in English. This meant that some workers were not able to understand all of the training content. The QISC reported that the contractor sets the language for the training session and in this case they had asked for English. In addition, the training consisted primarily of presentations, lasted for three hours and was held in a noisy

³⁹ 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.

mess hall. This reduced the amount of interaction and practical exercises, which limits participants' ability to retain the training content.

F. Accommodation and food

The WW Standards contain two appendices (A and C) that set out detailed accommodation, facilities management and food standards.

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Accommodation and food	84%	91%	46%

The accommodation and food section of the WW Standards includes the largest number of auditable points (87). It is perhaps unsurprising, therefore, that this section sees the highest number of issues raised, however, there were no critical non-compliances and 88% were minor.

Key non-compliances include:

- Workers at six contractors did not have access to reliable internet connections at their accommodation. At two of these contractors, the non-compliances were closed, as the contractor provided internet access, one through a computer room and another through Wi-Fi. The remaining four issues remained open as the issues were not addressed. In these cases, contractors cited that they either had plans to relocate their workers, or that the facility management company would not let them make the required infrastructural changes.
- Two contractors had multiple non-compliances related to insufficient numbers of toilets, wash basins and showers. Both these contractors were using the same site. At the follow-up audit, three of seven (43%) non-compliances were marked as 'progress made', as the numbers of facilities had increased. However, they still did not meet the number required; and four of seven (57%) remained open as no action had been taken. As above, implementing infrastructural changes is a challenge, as there is no alternative accommodation available to workers.
- Five contractors did not meet medical or first aid requirements for the accommodation site (e.g. on-site first aiders, doctor, nurse and/or clinic). In total, 11 major non-compliances were raised, of which six were closed (55%), one was marked as 'progress made' (9%), and four remained open (36%). Where issues were closed, the contractor met the requirements (e.g. by signing a contractor with an on-site clinic for its workers to access free of charge). For the issue marked as 'progress made', the contractor hired a new on-site doctor who only worked on a part-time basis.

G. Treatment

WW Standards requirements

The WW Standards require contractors to:

- Treat all job applicants equally and fairly (WW Standards 6.2)
- Have written policies and procedures that protect workers and ensure they are treated equally and fairly (WW Standards 9.1).

In addition, the WW Standards states that workers are free to travel to their home countries during their leave without penalty or threat of termination (WW Standards. 9.8b).

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Treatment	71%	93%	77%

The majority of workers (90% at initial audit and 96% at follow-up audit) said that they had never witnessed or experienced harsh treatment or verbal or physical harassment. In addition, the majority of workers (80% at initial audit and 73% at follow-up audit) feel that they are treated in the same way as others in the same job role.

The bulk of non-compliances in this section are policy gaps, which are raised as minor non-compliances. Contractors were able to close 77% of these non-compliances by developing or updating policies.

Impactt raised the following critical observations linked to harsh treatment at one contractor:

- Workers reported verbal abuse from two people at the accommodation site (the accommodation manager and a cleaner). The contractor conducted an investigation and training for the relevant staff. Based on this and the fact that workers reported that the verbal abuse had stopped, this issue was closed.

Impactt raised the following critical observations linked to financial deposits at 3 contractors:

- At three contractors, workers were required to pay deposits to guarantee their return from annual leave. The deposits ranged between QAR 600 and 1,800. During the follow-up audit, Impactt found that all three contractors had ended this practice and refunded the deposits to workers. Based on this, all three issues were closed.

H. Worker representation

WW Standards requirements

The WW Standards require contractors to establish a Workers' Welfare Forum (WWF) at each accommodation site. The forum must:

- Enable workers to raise concerns on any issue without fear of retaliation (WW Standards 16.1).
- Consist of the contractor's Workers' Welfare Officer and Worker Representatives (WW Standards 16.2).
- Ensure that Worker Representatives cover all nationalities (at least one representative per nationality) and are elected by workers every six months (WW Standards 14.1).
- Meet at least once a month (WW Standards 16.3).

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
Worker representation	77%	98%	87%

At the time of initial audit, Impactt found that 23 of 24 contractors had established WWFs at their accommodation sites. This area has seen continued improvement over the past two years: from 28% in 2016 to 67% in 2017, and 77% in 2018. This indicates significant progress and reflects the SC's efforts in this area. Contractors had made further notable progress at follow-up, achieving an average of 98% compliance and closing 87% of issues.

Progress includes the following:

- One contractor had not yet established a WWF at initial audit. This issue was closed as the contractor set up a WWF.
- Of the remaining 23 contractors that had established a WWF:
 - Four of them had either appointed representatives that were selected by managers rather than elected by workers, or managers had pre-selected candidates for whom workers could vote. Of these issues, three were closed (as the contractor held new elections to elect new representatives) and 1 remained open (no action had been taken as the contractor was going to be demobilised from SC project).
 - Four of them were missing a representative from a nationality group. Of these issues, three were closed (as the contractor held new elections) and one remained open (since for one nationality group, no workers wanted to become a representative).
- Workers at seven contractors reported that they were unaware of who their representative was. In three of these cases, it was a minority of workers. In four, it was all or the majority of workers. These seven cases were raised as observations. During follow-up, all were closed (83%) except one, where the contractor had made progress (17%). Contractors cite that the rapid flow of workers to and from SC projects means that it is challenging to ensure all workers are kept up to date.

Impactt attended a worker representative election at a main contractor. Those facilitating the election knew their roles and ensured that workers posted their ballots into a box anonymously. Workers clearly understood why the elections were held and many reported feeling excited about the process. The election turnout was 74% and representatives were elected from all three nationality groups: India, Bangladesh and Nepal. After voting, workers remained on the premises to hear the election results. At the end, a raffle was held in which a number of workers who had voted received a small prize (QAR 100, USD 27, in gift vouchers and phone credit). The BWI, MOADLSA, the ILO and the SC attended the election as observers.

As part of two follow-up audits conducted in January 2019, Impactt observed two WWF meetings. Impactt found that everyone was aware of their role and was able to contribute. Important issues were raised and discussed, including the application of the annual air ticket entitlement, issues with lack of overtime and accommodation maintenance. The meetings served as both a platform to raise grievances and to share information. Building on this, the next priority will be posting minutes on the notice board and supporting representatives to share the topics discussed and outcomes with their peers. This will be important in fostering trust in the WWF as a primary grievance mechanism.

I. End of service procedures

WW Standards requirements

The WW Standards require contractors to:

- Have a written policy stating the end of service procedures and the worker's entitlements (WW Standards 11.1).
- Pay workers' repatriation travel expenses (WW Standards 11.2).
- Pay the final wages and end of service gratuity to the workers before they return to their home country (WW Standards 11.3).
- In the case of a worker death, claim any amounts due under its workers' compensation insurance policy and promptly pay the whole of these amounts to the deceased worker's family (Bulletin 1, WW Standards 11.5).
- Procure and maintain a workers' compensation insurance policy (Bulletin 1, WW Standards 11.6).

Findings

Topic area	Audits in 2018		
	Compliance % at initial	Compliance % at follow-up	NCs closed (%)
End of service procedures	79%	89%	57%

Compliance rates in end-of-service procedures are high, rising to 89% at follow-up. Impactt raised one critical non-compliance:

- At one contractor, workers had to pay for their return ticket (equivalent to 1-3 months' basic wages) if they resign within the first two years of service. If they resign before the end date of their contract, the employer also deducts QAR 1,200 (USD 330) from their end-of-service payment to cover Qatar ID costs. The contractor has since revised the policy and shared it with workers. Impactt verified that this practice had ended and that all workers were clear on the changes. Based on this, the issue was closed.

Impactt also raised two major non-compliances at two different contractors for similar issues:

- At one contractor, workers who resigned before the end date of their contract had to pay for their return ticket home. During the follow-up audit, Impactt was able to verify evidence that one worker who resigned within a year was provided with a repatriation flight, and therefore the issue was closed.
- At another contractor, workers who resigned had to pay for their return ticket home. This issue remains open as the contractor had not amended its practice.



Summary of progress against the Roadmap

The tables below (7, 8 and 9) provide an update on the SC's progress on the recommendations set out in the 2018 Annual Report, based on Impactt's work during the year. Recommendations for the coming year are outlined in the final chapter (Conclusion and Recommendations).

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

Roadmap recommendations (from 2018 Annual Report)	Update (based on the 2018 audits)
Recruitment fees Build on the excellent progress made during the year and roll out the "Universal Reimbursement Scheme" approach, working with contractors to ensure legacy workers are reimbursed for recruitment fees they may have paid during recruitment, regardless of receipts. Continue working with contractors to prevent new workers from paying recruitment fees.	<ul style="list-style-type: none"> The SC has made remarkable progress on remediation. The Universal Reimbursement Scheme includes 134 contractors and will see a total of QAR 81 million (USD 22.2 million) being paid to 15,100 SC and 16,500 non-SC workers. The next hurdle is to reduce/eliminate recruitment fees. This will require joint action and bilateral government agreements. The SC has the opportunity to contribute its experience to these negotiations.
Pre-mobilisation approval of subcontractors Continue rolling out and documenting the effectiveness of this approach.	<ul style="list-style-type: none"> The SC has applied the process to 100% of the 392 subcontractors deployed to SC sites. The SC reported that this process has helped ensure the effective management and monitoring of the supply chain. During this process, contractors have agreed to house workers in designated accommodation sites and participate in the Universal Reimbursement Scheme.
Workforce management systems Complete rollout of workforce management systems across all sites to ensure that working hours are accurately measured and prevent contractors from employing workers without the required documents. Working hours Leveraging the data provided by the workforce management system, analyse root causes of excessive working hours and develop a process to manage unavoidable peaks in working hours, taking into account international law and good practices.	<ul style="list-style-type: none"> The SC is undertaking a study in consultation with industry experts to manage excessive working hours while ensuring that sufficient H&S breaks are provided. The SC has the opportunity to bring the same level of focus to this area during 2019 as it has exercised on recruitment fees.

<p>Accommodation and food: Continue requiring contractors to house workers at highly compliant sites and, where possible, to house main contractor and subcontractor workers at the same accommodation. We also recommend implementing the food and nutrition recommendations from the pilot programme conducted with Weill Cornell Medicine – Qatar.</p>	<ul style="list-style-type: none"> • The SC has made significant progress on accommodation. The SC reported that 98% of workers at SC projects are housed in highly compliant accommodation sites as of December 2018. • The SC has signed a three-year agreement with WCM-Qatar to build on the 2017 pilot. In 2018, the SC worked with a catering company to develop a more nutritious menu. In 2019 it will be tested and reach at least 1,500 workers per year. • More progress is needed on food and nutrition to roll out the menus developed through the pilot across accommodation sites.
<p>Communication: Support contractors in improving communication with workers, particularly before arrival and during the on-boarding process, so that workers fully understand their rights and the nature of their jobs.</p>	<ul style="list-style-type: none"> • The SC has made progress, as contractors are now clearer on the requirements and all are providing inductions to workers. • The QISC delivered worker welfare induction training for 6,155 new workers. • The SC has the opportunity to increase its focus on contractor compliance with pre-departure communication requirements (e.g. briefing on offer letters).

Table 7: Summary of progress: Pillar 1

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

Roadmap recommendations (from 2018 Annual Report)	Update (based on the 2018 audits)
<p>Amplify workers' voices: Continue promoting the anonymous SC Grievance Hotline and complete the roll out of worker sentiment and satisfaction surveys.</p>	<ul style="list-style-type: none"> • The SC made progress in raising awareness of the hotline and processing incoming grievances. The SC reports that as of December 2018, they have received 274 reports from workers, of which 254 (93%) have been resolved; 20 are under investigation. • SESRI conducted 2,048 face-to-face worker sentiment and satisfaction surveys. The findings will form the baseline for future surveys, which will be conducted bi-annually.
<p>SC Grievance Hotline: We recommend following best practice by publishing grievances raised and actions taken (anonymised).</p>	<ul style="list-style-type: none"> • The SC has not yet published results of the grievance hotline. The SC intends to publish aggregate statistics from various grievance mechanisms, including the Grievance Hotline and WWFs.

<p>Ensure that contractors run effective worker representation mechanisms (WWF) and grievance mechanisms: Continue working with contractors to ensure all worker representatives are elected by workers and that workers see the outcomes of the improvements driven by WWFs.</p> <p>WWF: Leverage the BWI's experience to build the skills of worker representatives in WWFs.</p>	<ul style="list-style-type: none"> The SC has made significant progress in establishing WWFs and conducting elections for worker representatives. Contractors had achieved a high level of compliance by follow-up audit (91%). Impactt found that elections are well conducted and meetings effective. The SC has designed a training module for worker representatives that will be rolled out in 2019 (see Pillar 3 updates below for more detail).
<p>Build worker skills: Continue to partner with the QISC to build and roll out worker skills training.</p>	<ul style="list-style-type: none"> The QISC delivered H&S training to 5,590 workers and worker welfare induction sessions for 6,155 workers. More progress is needed to ensure that workers understand the QISC training content and build worker skills beyond H&S and induction.
<p>Build management skills: Work with contractors to upskill people managers (middle managers, supervisors and foremen).</p>	<ul style="list-style-type: none"> Limited progress was made, with no training specifically for middle managers, supervisors and foremen on worker engagement.

Table 8: Summary of progress: Pillar 2

Pillar 3: Collaborate for greater reach and impact

Roadmap recommendations (from 2018 Annual Report)	Update (based on the 2018 audits)
<p>SC-BWI JWG: Continue working with the BWI to identify good practices for health and safety and WWFs, and continue rolling out these good practices across all sites.</p>	<ul style="list-style-type: none"> The SC continues to partner with the BWI, a unique partnership in the region. More progress is needed to roll out good practices across all sites, particularly regarding effective WWFs. Together with QISC, the SC has designed a training module for worker representatives on leadership, communication, negotiation, conflict resolution, and listening skills. The SC plans to train over 500 representatives in 2019.⁴⁰
<p>MOADLSA: Continue working with MOADLSA to circulate a list of blacklisted Qatari recruitment agents to contractors and escalate non-compliant contractors to MOADLSA.</p>	<ul style="list-style-type: none"> The SC has circulated the list of approved agencies. The SC's engagement with MOADLSA has moved to another level, with greater integration in compliance and enforcement. The SC is also taking the lead in sharing best practice with MOADLSA and the ILO on the implementation of WWFs and the temporary minimum wage.

⁴⁰ The training will commence on 28 April 2019 to coincide with the World Day for Safety and Health at Work

<p>Multi-stakeholder forums: Work within existing initiatives to identify solutions to improve the recruitment process in workers' home countries, including by finding ways to assess the recruitment practices of agents and sub-agents.</p>	<ul style="list-style-type: none"> • The SC has made progress in participating in worker welfare initiatives more broadly (e.g. Karama and ministerial subcommittees). • Limited progress achieved in identifying solutions to improve the recruitment process in workers' home countries. • Limited progress achieved in finding ways to assess the recruitment practices of agents and sub-agents.
<p>International leadership groups: Engage with international groups at leadership and practitioner levels. In particular, Impactt recommends engaging with stakeholders through the Mega-Sporting Events Platform for Human Rights.</p>	<ul style="list-style-type: none"> • The SC has made progress by actively participating in several international fora and events, primarily to share best practice on Universal Reimbursement Scheme. This work should continue so that other industries can benefit from the SC's experience.

Table 9: Summary of progress: Pillar 3

Conclusion and Roadmap recommendations for 2019

Overall, the SC has been successful in driving compliance in 2018, with the average overall compliance score reaching 89% after follow-up. In particular, great progress has been made on the challenging area of recruitment fees and this should remain a priority area for next year (2019). The SC has an opportunity to bring the same level of focus to the areas of working hours and wages as it has exercised on recruitment fees.

Impactt makes the following recommendations for 2019.

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

• Recruitment fees:

Remediation: Continue rolling out the Universal Reimbursement Scheme, ensuring that workers fully understand what the payment is for and that payments will continue (or be paid out in full) in cases of resignation, termination or transfer to a non-SC project.

Prevention: Study successful examples of low/zero fee recruitment from Qatar and beyond, and encourage contractors to seek more ethical recruitment channels.

- **Working hours:** Increase efforts on enforcing compliance with national law, focusing in particular on preventing the most extreme cases of working hours and consecutive days without rest. Where contractors lack effective monitoring systems, support them to better track and manage working hours.
- **Communication:** Focus on quality of management-worker communications, ensuring that pre-departure, on-boarding and workplace communication processes are effective.

- **Food and nutrition⁴¹:** Implement the lessons learnt from the Weill Cornell Medicine – Qatar (WCM-Q) pilot across construction sites and measure impact through worker feedback. Continue collaborating with industry and relevant stakeholders to understand the links between nutrition and good health.

Pillar 2: Prompt behaviour change in manager-worker interaction

- **Amplify workers' voices:** Continue with the worker satisfaction surveys begun in 2018, and track impacts of the SC's programme on workers' experience.
- **SC Grievance Hotline:** Publish aggregate statistics from various grievance mechanisms, including the SC Grievance Hotline and WWFs.
- **WWF:** Roll out planned BWI and QISC training for worker representatives, focusing specifically on communication, problem-solving and negotiation skills, as well as multi-cultural interaction.
- **Build worker skills:** Assess the effectiveness of skills training by measuring the impact on workers' skills and welfare.

Pillar 3: Collaborate for greater reach and impact

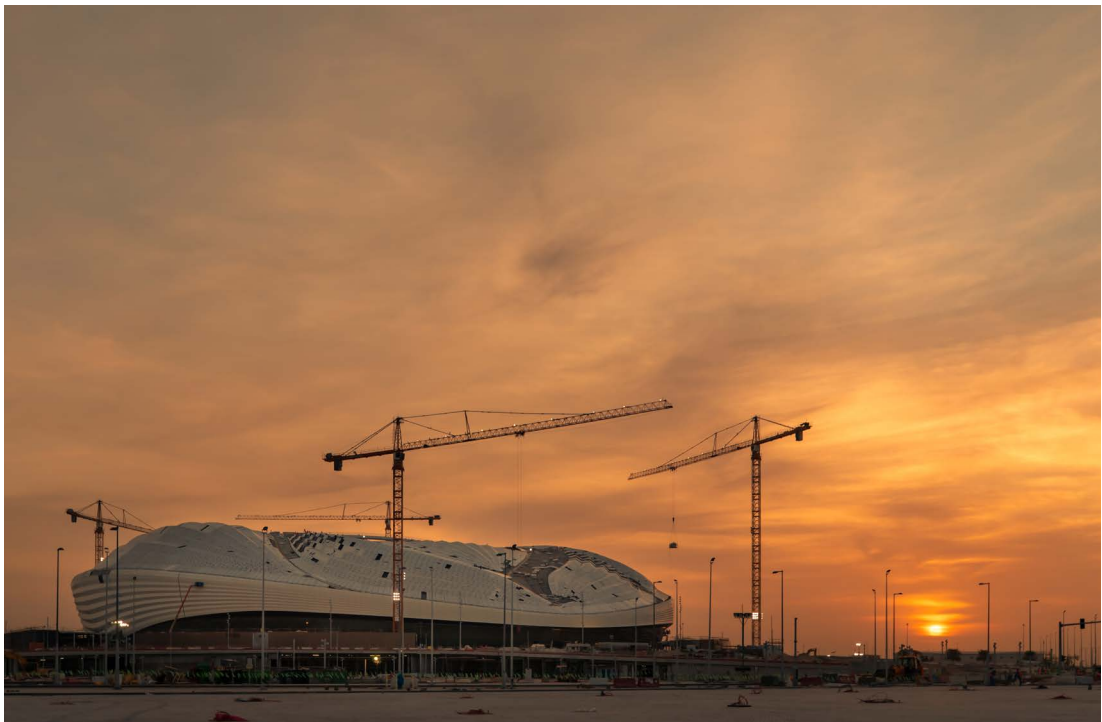
- **MOADLSA:** Continue collaborating with MOADLSA and the ILO to exchange best practice and identify ways in which the WW Standards can be introduced to national legislation. Focus on ensuring that the SC's experience is incorporated into national best practice.
- **SC-BWI JWG:** Continue collaborating with the BWI to carry out site inspections. Where possible, leverage the BWI's expertise to help upskill workers (e.g. for worker representatives in WWFs).
- **Multi-stakeholder forums:** Engage with government and the ILO TCP to build a legacy on the reimbursement of recruitment fees, and participate in government-to-government conversations on source country practices.
- **International leadership groups:** Continue playing a leading role in such groups to exchange best practice and solidify the SC's legacy. Engage with stakeholders in the space of mega sporting events as well as other sectors.

⁴¹ This activity indirectly contributes to achieving the pillar recommendations

Limitations

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

- At 2 contractors, workers were staying at more than one accommodation site. Due to time constraints, Impactt only visited one site for each audit.
- At 1 contractor, an incomplete list of workers was provided, leading to a smaller sample of workers interviewed.
- At 1 contractor, WWF minutes show that there was a discussion on passports but the minutes do not describe the nature of the issue. Impactt could not verify further with the WWO as he was unavailable during the audit.
- At 1 contractor, by the time of Impactt's follow-up audit, all SC workers had been demobilised and returned to their home country. This meant that no workers were interviewed.



Appendix 1: Topic area descriptions

Topic area	Requirements
Due diligence	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Contractor treats workers equally and fairly in their selection, employment, training and promotion opportunities. • Contractor has written policies on equal opportunities in order to: prohibit the imposition of additional or financial penalties as a disciplinary measure; prevent violence, bullying and harassment; prohibit the exploitation of workers' vulnerabilities; and take disciplinary actions against employees who breach the prescriptions of the 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	<ul style="list-style-type: none"> • Contractor reimburses workers who provide proof of paying recruitment fees. • Contractors pay for all costs of relocating workers to Qatar.
Contracts and administration	<ul style="list-style-type: none"> • Contractor uses recruitment agents registered with MOADLSA. • Contractor has a written agreement with the recruitment agency which meets 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	<ul style="list-style-type: none"> • Contractor completed a New Starter Checklist for each new worker. • Contractor provides an accommodation induction to workers in a language they can understand, which covers the requirements in the WW Standards. • Contractor delivers health and safety training. • Contractor provides workers with training and refresher sessions to perform their jobs.
Personal documents	<ul style="list-style-type: none"> • Contractor ensures that workers have a valid residence permit, Qatari ID and health card. • Workers are in possession of their personal documents. • Contractor provides workers with a storage facility.

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

Table 10: *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 WVV 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 better bridges with workers and better meet their needs.

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

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

Audit structure

The structure of Impactt's audits is:

- Pre-audit written communication and telephone call with each contractor to ensure they understand the audit objectives and process.
- Opening meeting at the contractor's offices with their senior and operational managers, including their human resources, compliance and Workers' Welfare Officer to explain the objectives and procedures of the audit.
- In-depth interviews with management and review of documents to understand the contractor's policies and procedures, and assess compliance with the 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 workers' welfare facilities 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 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 agree the findings. A representative from the SC and the PWWO typically attend the closing meeting.
- At the end of the audit, Impactt provides the contractor and the SC with a written copy of the audit findings. Contractors use this document to create remediation plans for each non-compliance or observation raised.

The audits covered:

- Due diligence processes: contractor's self-audits and audits of their supply chain.
- Integration of the 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 covered general health and safety management practices at accommodation and construction sites, including health and safety inductions for workers. Impactt did not investigate or assess accidents, including worker fatalities at construction sites. This is because Impactt's audits focused on workers' welfare requirements rather than technical health and safety construction standards.

Using the "worker journey" structure, Impactt's auditors began 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 intrinsic to the global labour supply chain.

Appendix 3: Methodology

Sampling of contractors

Impactt selected which contractors to audit independently and randomly from a cross-section of projects and contracting tiers. Table 11 below shows that Impactt has covered most project sites and, where applicable, all tiers. Four contractors were audited with regard to their activities at two or more sites. The grey boxes indicate where there were no contractors to audit at the time of Impactt's audits (i.e. sites were completed or transitioning between construction phases), or where Impactt has conducted audits in previous years and found the sites to be comparably low risk (e.g. SC office and Nursery).

Sites ⁴²	MC	T1	T2
Al Bayt Stadium	2	2	2
Al Bidda (SC office)			
Al Rayyan Stadium	1	4	
Al Thumama Stadium	1	2	
Al Wakrah Stadium	2	1	3
Doha Port		1	
Lusail Stadium		3	
Training sites			
Education City	2	1	1
SC Nursery			
Ras Abu Aboud Stadium			
Manufacturing factory (supplying stadiums)	1		
Aspire Turf Farm			

Table 11: Coverage of SC project sites⁴³

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

⁴² Impactt and the SC categorise the sites differently. The SC factors in the stage of construction (e.g. demolition) when categorising, whereas Impactt does not. Based on Impactt's categorisation, there are 13 sites.

⁴³ Where a contractor operates at multiple SC sites Impactt's audit scope is extended to cover as many sites as possible. In 2018, there were four audits that covered two or three sites. As a result, the total number of sites covered in the table (29) is greater than the total number of audits (24).

- Tier 1: specialist companies such as excavation, scaffolding, landscaping, contracted by the main contractors.
- Tier 2: generally manpower agencies, which supply labour to other companies.

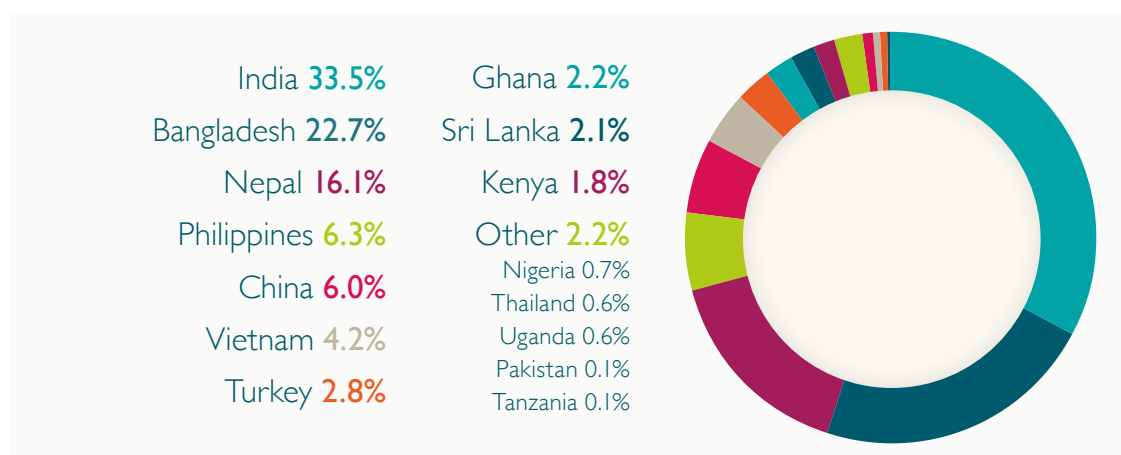
The table below (Table 12) summarises Impactt's sample in relation to the overall population of workers at SC projects.

Impactt sample				
		Sample	Population (of workers) ⁴⁴	% covered
Interviews conducted		1,109	27,500	4%
# of workers' nationalities		15	36	42%
Workers interviewed	Main	411	12,700	3%
	Tiers 1-2	698	14,800	5%
SC sites audited		8	13	62%
Contractors audited (initial & follow-up)	Main	7	38	18%
	Tiers 1-2	17	306	6%

Table 12: *Impactt sample*

The nationalities of workers interviewed are shown in the figure below (Figure 6). Impactt interviewed workers from 15 of the 36 nationalities present at SC projects. More than four-fifths of all workers interviewed were nationals of Nepal, Bangladesh and India, the most common countries of origin for workers at SC projects.

Figure 6: *Workers interviewed by country of origin*



⁴⁴ Data provided by the SC, as of January 2019



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GOOD FOR WORKERS
WORK FOR BUSINESS