

**2021 Questions for Hotel Companies
Migrant Worker Rights**

Please complete the questions on your company's operations in Qatar. For all answers please ensure you provide as much evidence as possible and links to all policies referenced if publicly available.

Scope of operations

1. Please describe the scope and structure of your company's operations in Qatar in the table below, including the business model each hotel operates under (owned and managed; leased; managed properties; franchised properties; joint ventures; other).

No.	Name of hotel	Business model	Property owner
1	Radisson Blu Hotel, Doha	Managed	H.E. Sheikh Ghanem Bin Ali Al Thani

Workforce data

2. Please complete the table below with workforce data.

Employment type	Total number of people	Male	Female	Main nationalities / countries of origin
Directly employed by property	100%	78 %	22 %	Nepalese
Employed by property owner	-			Sri Lankan
Employed by subcontractors (e.g. service providers or labour suppliers)	-			Filipino
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)	-			Indian
				Bangladeshi
				Burmese
				Sudanese

If the exact breakdown is not available, please provide % estimate of workers employed directly and those subcontracted.

3. Please complete the table below with labour supply data.

No.	Labour supply company	Nature of work eg. Cleaning, housekeeping, security	Total number of people
1	Confidential Myanmar	Front Office / Housekeeping / HR Laundry / Maintenance / Reservations / Kitchen / Service / Stewarding	6%
2	Confidential Philippines	Accounts / Front Office / Housekeeping / HR / Laundry / Maintenance / Recreation / Security / Kitchen / Service Stewarding / Sales / Reservations	19%
3	Confidential Nepal	Accounts / Front Office Housekeeping / HR / Laundry / Maintenance / Recreation / Security Kitchen / Service / Stewarding	12%
4	Confidential Nepal	Accounts / Front Office Housekeeping / HR / Laundry / Maintenance / Recreation / Security Kitchen / Service / Stewarding	8%
5	Confidential Sri Lanka	Accounts / Front Office Housekeeping / HR / Laundry / Maintenance / Recreation / Security Kitchen / Service / Stewarding	20%
6	Confidential Nepal	Accounts / Front Office Housekeeping / HR / Laundry / Maintenance / Recreation / Security Kitchen / Service / Stewarding	7%
7	Miscellaneous	Accounts / Front Office Housekeeping / HR / Laundry / Maintenance / Recreation / Security Kitchen / Service / Stewarding / Sales Reservations	28%*
Contacted party names cannot be disclosed			100%

* 28% are various other recruitment agencies, direct recruitment, or internal transfers which are not covered in the above countries of origin.

If the exact breakdown is not available, please provide % estimate of workers provided by each company.

Human rights and due diligence

4. Does your company have a publicly available policy commitment to respect human rights in its operations and throughout its business relationships which specifically addresses workers' rights and references relevant human rights standards (e.g. UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, ILO core labour conventions)¹. Yes/No. If yes provide link.

RHG abides by the UN's Global Compact principles and follows them in our policies and procedures. We've committed to raise awareness of human rights risks, and address risks arising in the labor supply chain. Key human rights and employment principles are reflected in two policies, which complement our [Code of Business Conduct and Ethics](#) and clarify the principles we live and work by in our hotels. These policies are:

• [Human rights policy](#): covers RHG's engagement on issues such as ethical business conduct, the protection of children's rights, combating human trafficking, and protection of the rights of employees.

• [Employment Principles](#): covers RHG's promises to our employees. These include non-discrimination, freedom of association, and the development of in-house talent. Both policies are publicly available, communicated on internal channels, and made available to all hotels and employees.

At Hotel level:

- RHG's Code of Business Ethics has been displayed in one of our main Notice Boards at the staff entrance.
- On the first day of HR Orientation, a copy of this document is given to the new joiners for their perusal.
- All staff are re-trained in Living Responsible Business Training.

5. Does your company have a human rights due diligence process for identifying and prioritising workforce risks in its operations and throughout its business relationships specifically in Qatar? Yes/No. If yes, please explain this process and highlight the top three workforce risks you identified.

RHG has an EMEA wide approach, not region specific. Operational due diligence processes include that Every hotel undergoes an internal audit every second year. Elements of the audit include controlling background checks for all positions that are handling cash as a part of their role or in other sensitive positions. The background check must be done by an external company.

Other elements include supplier contract approval, work permits for employees of outsourced companies, reference checks of other partners of the supplier and background checks on outsourced employees in Accounting & Finance, Human Resources, Security, IT, Front Office and Food & Drinks.

Our aim is to combat and eliminate any form of modern slavery and operate free of slavery; exploitation of children; and forced, bonded and compulsory labor.

At hotel level:

- Before signing the contracts with Outsourcing Companies, we conduct due diligence checks and verify all their documents.
- Work Permits are obtained and renewed timely for the female workers who are sponsored by their husband / father.

¹ According to the [UN Guiding Principles on Business and Human Rights](#), the term "business relationships" encompasses business partners, entities in the company's value chain, and any other State or non-State entity directly linked to its business operations, products, or services. This includes entities in its supply chain beyond the first tier, and indirect as well as direct business relationships. The business partners we are primarily interested in for the purposes of this survey are hotel property owners, management companies, labour suppliers, and service providers.

Business relationships and human rights:

6. When selecting business partners, does your company consider how potential partners treat migrant worker rights? Yes/No. If yes, please detail your vetting process for selecting subcontractors and hotel owners. Is consideration given to recruitment fees, wages, general working and living conditions, and health and safety? Are these considerations weighted against cost? What percentage of business relationships are rejected due to risks?

At hotel level:

- All Business Partners in Qatar comply with Migrant Workers Rights, that introduced in several reforms by the Qatar government.
7. Does your company require hotel property owners and subcontractors in Qatar to comply with your human rights and other rights-related policies and procedures (eg. through contract clauses, brand standards)? Yes/No. If yes, please provide link to this policy or other evidence for both property owners and subcontractors. How do you ensure they understand the requirements (e.g. through trainings and workshops) and what mechanisms do you employ to monitor compliance and hold them accountable?

Yes, every supplier / subcontractor is required to follow the Supplier Code of Conduct. It must be adhered to by all suppliers on corporate and regional levels which becomes part of the suppliers' commitment. It's the hotel's and owner's responsibility and checked by area HR that processes are in place via HR audits.

Note that currently we don't check this as there has been no HR audits due to massive HR transformation happening across the organization

Recruitment

8. Does your company have a publicly-available policy which requires that no worker in its operations or supply chains should pay for a job, and that the costs of recruitment (i.e., recruitment fees) should be borne by the employer ("Employer Pays Principle")? Yes/No. If yes, please provide link to the policy.

This is all reflected in our [Human rights policy](#) and [Human Rights Commitments](#) and put out to our suppliers / contracts via the [Supplier Code of Conduct](#). This is also referred to in the [Modern Slavery Statements](#).

9. Please describe the due diligence process you undertake to ensure that your recruitment standards are applied. In your answer please address specifically:
 - a) Whether you carry out due diligence on recruitment agents in sending countries? Yes/No. If yes, provide details.
 - b) Whether you conduct interviews with workers prior to employment to establish if fees have been paid? Yes/No. If yes, please provide details including percentage of workers you interview.
 - c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe.
 - d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.
- All candidates are hired through Qatar Visa Centers set up in many Asian countries (i.e. Nepal, Sri Lanka, India, Philippines and Myanmar.) and the hotel bears the fee related to the recruitment of workers i.e. Medical, Contracts, Fingerprints, Biometric and visas)

- An Addendum has been signed by all the agencies stating that no worker should be charged with any recruitment or processing fees including any upfront deposits or security-payments for the provision of recruitment services and prohibits the confiscation of the workers passports or other personal documents by the recruitment agents.

10. How many instances of recruitment fees paid by workers has your due diligence processes uncovered in 2019 and 2020, and how much (if any) was paid back to workers during this period. What percentage of your workforce were found to have paid fees?

None

Payment & wages

11. What is your company's process for determining workers' wages in Qatar, and what benchmarks does it use to set wage levels (e.g. do you have a non-discrimination and/or living wage policy; if so please provide)? Please explain how these policies apply to subcontracted workers including how you monitor this and whether you collect data on wages paid by subcontractors.

This is done following an internal benchmark by the area HR office with the AON Hewitt benchmark. Glassdoor.com is also used and has been proved successful for more senior positions in the hospitality industry.

At hotel level:

- As per Qatar Labour law, the Minimum Wage level is set at QR.1000/- But, we set the minimum wage level as QR.1200/- which is at par with other hotels in Qatar. (Hotel is providing free 03 meals a day / Free Transport and Housing)

12. How does your company ensure that workers are paid on time and in full, including for overtime and without illegal deductions? How does this apply to subcontracted workforces? What steps does the company take when your labour suppliers or subcontractors fail to pay workers on time and in full (please illustrate this with specific examples)?

We have corporate and area policies in place which are regularly checked during the HR audit. It also forms part of the controlling audit.

At hotel level:

As per the (WPS) Wage Protection System in Qatar, we pay the salaries of the employees on time without any illegal deductions.

Redundancy of workers due to COVID-19

13. If your company, your subcontractors, or other business partners terminated contracts of workers in your hotels during the COVID-19 pandemic, please state how many workers in total were terminated during 2020 and what percentage of the workforce this represents. Please provide figures for your own operations and that of your subcontractors and business partners, including hotel owners.

The focus has been more on performance and delivery. Thus, employee performing below expectations were performance managed.

14. Please explain the process undertaken to decide which workers would be terminated and what, if any, non-financial assistance was provided to terminated workers (that was not part of their termination package e.g. plane tickets home) that went beyond that prescribed by the Qatari Government. What policies and processes (if any) did you implement to ensure

that a fair process was conducted for workers employed by subcontractors, and how did you monitor this?

All terminations were fully compiled with local legislation and additional assistance e.g; encashment of leaves offered on case to case basis

15. If, and when, workers were terminated, what financial packages/compensation were given to them? What packages/compensation were provided to subcontracted workforces and how did you monitor this?

As above

Document retention, job mobility & freedom of movement

16. How does your company ensure that workers have free and secure access to their passports and identity documents? How does this apply to subcontracted workforces? What steps does the company take when you discover that workers subcontracted at your hotels do not have sole, secure access to these personal items?

RHG is committed to combatting modern slavery, educating employees and encouraging its partners and the broader business community to take a stand against human trafficking. Therefore, RHG strives to achieve that:

- Every employee has a worker contract
- No employee is forced to work
- No employee is forced to hand over government issued identification, passports, work permits or bank cards
- No employee is required to pay any worker fees to receive work
- No excessive deductions are made from employees' wages

Unless authorized by an employee in writing, the hotels do not require passport / visa for safekeeping. If authorized by the employee, the passport is kept in the hotel safe, accessible for the employee at any time upon request.

At hotel level:

- As per the Qatar Labour Law, it is prohibited to keep the passports of the employees unless the employee requests the hotel to keep passport for safekeeping.

17. How does your company ensure that workers are free to change jobs at will and without penalty? How does this apply to subcontracted workforces?

In your answer, please provide information on the following:

- Are there any restrictions based on type or length of contract?
- How many workers have made requests to change employer using the new Ministry of Labour sponsorship transfer process and how many of these transfer requests were granted?
- Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?

Offering of fixed term contracts has been reduced and instead permanent contracts with notice period are offered. This requires a resignation in writing. The resignation can be done at any time. Previously there were restrictions by law, due to visa restrictions, but this has changed.

At hotel level:

- As per the new sponsorship guidelines in Qatar, employees are free to change their jobs without any penalties.
- There is no restriction regardless of type or length of contracts.
- Approximately 50 employees requested to change their jobs.

- Notice period to be completed by the workers accordingly.

Sr. No.	Change of Sponsorship	No. of Staff
	TOTAL NO. OF STAFF REQUESTED TO CHANGE	50
1	Already Transferred	25
2	Rejected & returned to their countries	05
3	Approved & under process with New Sponsors	03
4	Approved & under the notice period	07
5	Pending Approval	07
6	Left the country before getting the approval	03

Five of our staff had resigned from our services and applied to the Ministry of Labor to transfer their work permit to some other companies. three of them got the approval from the ministry, but the new companies failed to complete the process within the allowed period of time, thus labor office cancelled the approval and eventually they were sent back to their countries. The other two staff request was rejected by the ministry and they were sent back to their countries.

18. Do you have a policy that specifies workers should not be subject to restrictions on movement, including curfews in provided accommodation? Yes/No. If yes, please provide the policy or other evidence. If there are curfews, are there any differences in treatment of men and women? Yes/No. Does your policy apply to subcontracted workers?

At hotel level:

- Yes, we have the curfew for the female employees to ensure their safety and wellbeing. However, we grant extension requests till late night (01:00am) or overstay on special occasions.

Health & safety

19. Do you have specific policies and protocols to manage outdoor work (e.g. security, gardening, cleaning) and prevent the risk of heat stress beyond implementation of the national summer working hours ban? Yes/No. If yes, please provide the policy or other evidence. Does this apply to subcontracted workers? Yes/No. If yes, please provide policy or other evidence.

Corporate Health & Safety policy is followed, which all employees are trained in as part of the New Hire Orientation Training and the Responsible Business Training. In many cases a separate Health & Safety Training is provided too. This is generally done by the Security Department, every six months.

At hotel level:

- As per the Qatar Ministerial Decree No. 16 of 2007, it is mandatory to adjust the duty timing of the staff working under direct sunlight during summer.

20. Do you have policies and procedures in place to protect workers from becoming infected with the COVID-19 virus? Yes/No. If yes, please policy or other evidence. Does this apply to subcontracted workforces? Yes/ No. If yes, please provide the policy or other evidence.

In response to the development of the COVID-19 pandemic, we continue to follow the latest advice and recommendations from the Center for Disease Control (CDC), World Health Organization (WHO) and the local authorities in the countries we operate in..

Radisson Hotels has activated our corporate crisis response teams worldwide and has strong processes and support teams in place. Along with a team of experts, we have reviewed our existing health and safety processes and developed the Radisson Hotels Safety Protocol (e-brochure). This in-depth cleanliness and disinfection protocol was created in partnership with SGS and is designed to ensure guests and team members safety. The 20-step protocol for hotels and 10-step protocol for meeting and events space has been introduced and recommended to all hotel locations. Each of our hotels has also been equipped with resources and educational materials on how to handle suspected or confirmed cases of coronavirus

(COVID-19) or lockdown for quarantine purposes in cooperation with the local authorities. See also [Radisson Hotels Safety Protocol](#).

At hotel level:

- The Hotel has implemented the RHG's safety protocol and is certified by the SGS and Qatar Clean Program. All staff follow the guidelines and procedures stated under these programs.

Living conditions

21. Please provide your company's standards for workers' living conditions (Please provide policy or other evidence). What steps does the company take to monitor the performance of subcontractors and labour suppliers to house workers against company and government standards? What remedial action is taken if these standards are breached?

Standard Operating Procedures are in place to ensure the employer is providing decent accommodation. Living conditions are audited and discussed by Regional Director and Regional HR and regular visits are done by the hotel.

At hotel level:

- Hotel provides safe and hygienic accommodations to all employees with regular preventive maintenance measures in place with regular audits conducted by the HR team.

22. Please describe any changes you made to workers' living conditions in response to the COVID-19 pandemic. Do these apply to subcontracted workers? Please detail how you monitored compliance with any new COVID-19 specific requirements specified by your policies or by the Qatari Government.

At hotel level:

- As per the local government guidelines, we have implemented the following preventive measures;
 - Arranged separate accommodations / flats for quarantine facilities.
 - Monitoring temperature of the staff coming to the accommodations.
 - Reduced the number of employees in a room to have enough distance.
 - Arranged extra chefs in Cafeterias for serving food.
 - Reduced the seating capacity in staff Cafeterias
 - Appointed a separate committee to monitor the employee's commitments towards the COVID -19 guidelines.
 - Fixed adequate hand sanitizing dispensers and Soap dispensers
 - Closed down the recreational facilities.

Prevention of discrimination, physical and sexual abuse, exploitation and harassment

23. Does your company have the following policies:

- On the prevention of bullying, discrimination and physical abuse of workers, by fellow workers and/or hotel clients in its operations and business relationships? Yes/No. If yes, please provide the policy or other evidence.
- On the prevention of sexual abuse, exploitation, and harassment by fellow workers and/or hotel clients in its operations and business relationships. If yes, please provide the policy or other evidence.

RHG's internal Code of Business Conduct and Ethics contains rules and guidelines and serves as a reminder to all employees of our policies and commitment to do what is right and ethical. The Code applies to every person who works for us, and every one of our companies. It is distributed to all employees.

All employees are trained in the Code of Business Conduct and Ethics, its implications, and reporting processes. The training, part of immersion training for new starters in the group, is mandatory for all employees and includes a reference to the RHG ethics platform. The Code of Business Conduct and Ethics is conforming with the EU's GDPR regulations and other policies.

ethics.radissonhotels.com is a website run by an independent third-party organization. Employees can use this site to find information on our Code of Business Conduct and Ethics and report concerns anonymously. Any employee with concerns or questions about the Code is encouraged to raise these directly with their supervisor or person of trust in the hotel or regional organization. If this is not possible, the employee can report the issue online. The site is available in eleven languages and can be utilized by all employees, outsourced employees, and agency workers.

Also check: [Code of Business Ethics](#)

24. Please provide the following information on the systems in place for reporting, investigating and redressing cases of abuse:

- How are workers made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?
- How are business partners made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?
- Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?
- What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?
- What support you provide workers who make a claim of sexual abuse, including by hotel clients? including to file a criminal complaint, seek medical care, and pursue redress against a perpetrator, such as a hotel client? Does any provision of support also apply to subcontracted workers?

At hotel level:

- Employees are advised and trained during their 1st day of the orientation
- Outsource employees are advised and trained in our basic hospitality trainings.
- Yes
- We follow the RHG's Code of Business Ethics and reporting mechanism. Additionally, employees are advised to report any concerns or issues directly to the immediate supervisors / Department Manager / HR Manager and General Manager.
- No such cases have occurred.

25. How many grievances were raised by workers in 2019 and 2020 in relation to:

- Bullying, discrimination, physical abuse in its own operations?
- Bullying, discrimination, physical abuse in its subcontracted workforce?
- Sexual abuse, exploitation, and harassment in its own operations?
- Sexual abuse, exploitation, and harassment in its subcontracted workforce?

This information cannot be disclosed as it can't be anonymized.

Representation & remedy

26. How many of your hotels in Qatar have worker committees or an equivalent mechanism for worker organising? How are worker representatives selected? Do the committees cover subcontracted workers?

100%. As part of RHG [Employment principles](#), we respect our employees' rights to freely join associations and organizations, and organize in unions and conclude collective bargaining agreements. Hotels have the possibility to setup a Joint Consultative Committee, which is rolled out in UAE, Oman and Qatar as part of the area HR plan. Elected representatives of every hotel department are involved in the Committee.

At hotel level:

- The hotel has a committee with 37 members representing different nationalities / departments / genders / religions. They have been selected by calling for nominations from the departments and on voluntary basis.

27. In line with the UN Guiding Principles on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? How are workers made aware of this mechanism? How are subcontracted workers made aware of this mechanism?

The Code of Business Ethics implementation includes the ethics reporting page of ethics.radissonhotels.com, a website run by an independent third-party organization. Employees can use this site to find information on our Code of Business Ethics and report concerns anonymously. Any employee with concerns or questions about the Code is encouraged to raise these directly with their supervisor or person of trust in the hotel or regional organization. If this is not possible, the employee can report the issue online. The site and hotline are available in eleven languages for all employees, outsourced employees and agency workers.

At hotel level:

- We follow the RHG's Code of Business Ethics and reporting mechanism.
- Additionally, employees are trained in their New Hire Orientation to report any concerns or issues directly to the immediate supervisors / Department Manager / HR Manager and General Manager.

28. How many grievances were raised by workers in 2019 and 2020 in relation to:

- Recruitment costs?
- Wages?
- General working or living conditions?
- Health and safety?
- How many of these grievances were raised by subcontracted workers?

This information cannot be disclosed.

Other information

29. Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in the Gulf region, including any challenges it faces in doing so?

Qatar hospitality working group

RHG continues its work in Qatar in support of the new labor law reforms, in preparation of the 2022 FIFA World Cup football. Under the guidance of International Labor Organization (ILO), funded by the Government of Qatar, in collaboration with International Human Rights and Business (IHRB) members of Sustainable Hospitality Alliance (SHA) have participated in the hospitality working group in Qatar, building the capacity of the hospitality sector in Qatar to ensure sustainable growth and decent work. Radisson has been an active participant providing input for guidance tools on due diligence of recruitment practices and by sharing of best practices on specific thematic issues. Learnings from the working group are already applied in the wider scope of RHG's operations and will be piloted in our hotel in the SHA project with Humanity United, supporting Nepali labor migrants working in hotels in Qatar.

At hotel level:

- The hotel is part of the Hospitality Working Group operating in Qatar and the forum enables us to bring forward any concern related to employees' welfare to the ADLSA/ ILO.

Toolkit to combat modern slavery

To raise awareness and to prevent forced labor, RHG developed a toolkit to combat modern slavery. The toolkit is available to all hotels, in EMEA, and helps hotel management and HR teams in their efforts to combat the issue. Our efforts have a focus on protecting outsourced labor, which represents 12.5% of the workforce in our hotels in EMEA.

The toolkit also details how hotel management teams should engage with employees, how to check recruitment agencies, and what due diligence they should conduct. It includes back-of-house material which increases the awareness of modern slavery amongst employees.

A specific training module on how to use the toolkit has been included in the Leading Responsible Business training for all Head of Departments and General Managers.

Additional support tools are available for general managers, human resource teams and head of departments at the hotels. The toolkit is available in 16 languages. Across the Group, 62% of our hotels in EMEA actively use the toolkit.

Self-assessment questionnaire

A vital part of the modern slavery toolkit is the hotel self-assessment tool. The questionnaire is designed to identify potential gaps and human rights vulnerabilities in the business processes of hotel properties. It also identifies the vulnerabilities of third-party intermediaries.

These intermediaries typically provide services related to the recruitment, selection, hiring, transportation, training, and management of migrant workers.

Industry impact to tackle forced labor

To combat slavery in the hospitality industry, ITP and its members, including RHG, launched the Principles on Forced Labor to address human rights risks in the labor supply chain in 2018. The principles state:

1. Every worker should have freedom of movement
2. No worker should pay for a job
3. No worker should be indebted or coerced to work

The Group continues as active member in the work group on the development of human rights.

Further steps by RHG

The risks of modern slavery and human trafficking in our operations, and in our supply chain, need our constant attention. Because of the growth of our operations, we must continuously monitor and manage our supply chain risk. We will continue to combat modern slavery and human trafficking to minimize and manage risks and develop better ways to increase the visibility of our actions in our operations and supply chain.

Over the coming year we plan to:

- Continue the development of tools on the responsible recruitment framework and to make them available to our hotels. We will continue to conduct risk evaluations of suppliers of outsourced labor.
- Continue to encourage hotel teams to use the Responsible Recruitment toolkit
- Further develop elements of the Self-Assessment Questionnaire in Area HR audit processes
- Continue supplier engagement and fully implement evaluations and risk mapping analysis for all corporate suppliers, and all high-risk and high-volume regional suppliers to ensure they are complying with our Responsible Business, Human Rights, and preventing Modern Slavery policies.



- Continue our cooperation with other industry partners via the ITP network and the human rights working group to identify and share best practices and participate in projects such as the ILO working group in Qatar
- Include and update modern slavery elements in our existing manuals, contracts, owner International Management Agreements (IMA), standards of operation, and audits

Also read or download our Modern Slavery Statement 2019 [here](#) and 2018 version [here](#). Next statement will be published Q2 2021.