



Hotel brands - Questions on migrant worker rights in Qatar (2021)

Company: Millennium & Copthorne Hotels

This company responded to the survey on 30 September 2021, subsequent to the report being released.

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	Millennium Plaza Hotel Doha	Owned and managed	Barwa Al Sadd (SPC)
2	Millennium Hotel Doha Al Sadd	Owned and managed	Al Sraiya Hotels & Hospitality Group
3	Millennium Central Doha	Owned and managed	Al Sraiya Hotels & Hospitality Group
4	Kingsgate Hotel Doha	Owned and managed	Al Sraiya Hotels & Hospitality Group

Workforce data

2. Please complete the table below with workforce data.

Below indicated numbers are total for all M&C properties in Qatar

Employment type	Total number of people	Male	Female	Main nationalities / countries of origin
Directly employed	293	248	45	India, Philippines, Nepal Sri Lanka, Bangladesh
Employed by property owner	293	248	45	India, Philippines, Nepal, Sri Lanka, Bangladesh
Employed by subcontractors (e.g. service providers or labour suppliers)	43	40	3	India, Uganda, Bangladesh
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)				

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

No.	Labor supply company	Nature of work e.g. Cleaning, housekeeping, security	Total number of people
1	Total Care Company	Food and Beverage Services	10
2	Lusail Security Company	Security	19
3	Dream Paradise, Sky moon, Class and New Image	Housekeeping	14

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) Yes/No.

Answer: Yes. We make sure that these policies and procedures are aligned with the country's labor law, and the same implementation applies to our sub-contractors/suppliers. It is set out in our code of conduct and business ethics and equal opportunity policy (attached: HR- Welfare 002). A separate policy for our sub – contractors and suppliers are also available to ensure that the rights of their workers are implemented accordingly. (Attached: working condition 001 – Casual Labor).

5. Does your company have human rights due diligence process for identifying and prioritizing 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.

Answer: Yes. Due diligence is incorporated in our whistle blowing policy and grievance procedure. (Attached: HR Welfare 018 – Whistle Blowing & HR Managing Performance 002 – Grievance Procedure). Proper investigations and internal audits are conducted for any concerns raised by the employees. Risks may occur with our casual employees since hotel has no full control of their practices, hence we require the suppliers to reflect transparency of their worker's rights in the contracts. Site visits are also done to ensure the consistency in implementing these practices.

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?

Answer: Yes. When selecting potential partners points thoroughly checked include, but are not limited to:

- Processing and completion of all legal documents of the employee.
- Salary Wages and WPS system compliance
- Entitlements of the workers mentioned in the contract should be as per labor law

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 (e.g. 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?

Answer: Yes. It is a top requirement from the sub- contractors/supplier to comply with all the clauses mentioned in the contract pertaining to the employees' rights. The same applies to our direct employees; it is our responsibility to ensure that all the clauses are aligned with the labor law. Related policies and procedures are included in onboarding induction, orientation, and refresher sessions (to keep the employees informed in case there are updates). Consistency in compliance is monitored through acquiring feedbacks from employees (both direct and casual employees), contract reviews, internal audits, and annual audits conducted by the corporate office. In cases of non-compliance, the hotel coordinates with the suppliers/sub-contractors for the necessary rectification and/or cease the business relationship for severe cases.

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.

Answer: We have a policy in place (HR Recruitment and Selection 010 – Recruitment Agencies) Moreover, we ensure that all contracts with selected recruitment agencies includes a clause as follows: "No recruitment fees to be collected either by the recruitment agency or the hotel from the candidate and recruitment costs are borne by the employer." During recruitment process, HR is directly communicating with candidates to ensure that the entire recruitment process is done with integrity and are aligned with the contract.
Attached Policy on Recruitment and Selection – Recruitment Agencies

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.

Answer: Yes. Similar to hiring process, we conduct feedback checks from networks who worked with the same recruitment agents and from candidates hired through them. Prior to the pandemic, site visits were conducted by the corporate office HR, to ensure that due diligence are in place.

- 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.

Answer: During onboarding of employees hired through recruitment agencies, it is a practice to check with them if they were charged with recruitment fees. An average of 10% of employees were interviewed.

- c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe. Yes.

Answer: There are two copies of the offer letter signed by the employee. One copy is for the employee, and one copy is kept in their hotel file. Both offer letters have the same terms mentioned in the labor contract to complete the residence visa process. Moreover, it is a practice to attest the contract and job orders in the home country embassies and labor offices of candidates hired overseas. For casual employees, it is mandatory that the suppliers/sub-contractors provide clear transparency of their rights in accordance with the labor law.

- d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.

Answer: Yes. Monitoring done through site visits, legal/official document compliance, licenses, contract review, and employees' feedback.

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?

Answer: None in 2019, whilst overseas recruitment was on halt due to the pandemic in 2020, and all hiring are done with locally available candidates.

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.

Answer: In compliance with the labor law in the country. Salary surveys are conducted on annual basis to ensure that the salaries offered are within the market scale. Nondiscrimination clause is mentioned in our policy in place (HR Welfare 009 – Equal Opportunities). Salaries offered are based on the levelling framework and position within the organization. As for the casual employees, the suppliers/sub contractors are required to include a clause in the contract mentioning the salaries, and other benefits of their employees that should comply with the labor law.

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)?

Answer: Our payroll related practices comply with the labor law. Moreover, it is monitored through WPS system. Notification/Alerts are sent to companies if WPS transfer is not completed by the seventh of each month. Any concerns from casual employees regarding their payment are communicated with the suppliers/sub-contractors for immediate action.

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.

Answer: Due to pandemic, all outsourced contracts were temporarily cancelled. An average of 10% of the total direct employees in all M&C properties in Qatar were made redundant.

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?

Answer: Termination practices comply with labor law. Nationality, ethnic origin, background, religion, gender is not a basis in determining terminated employees. Process undertaken to decide which workers to be terminated is based on positions, roles, function. Moreover, terminated employees who are not able to fly back to home countries due to travel restrictions were offered free accommodation, meals, insurance etc. until repatriation.

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?

Answer: All compensation provided is as per labor law. Monitoring is done through checking of final settlement and other exit formalities.

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?

Answers: All direct employees have free access to their passports and identity documents. In the event that a casual employee raises a concern, it is communicated with the sub-contractors/ suppliers in writing for remedial action and necessary investigation.

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? Following as per existing labour law. (E.g. online platform in changing employers where NOC is not required)

In your answer, please provide information on the following:

- Are there any restrictions based on type or length of contract?

Answer: In terms of notice period. 1 month if tenure is 2 years or less and 2 months if tenure is more than 2 years.

- 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?

Answer: An average of 7% in total for all M&C properties in Qatar. All got the approval so far within 2 – 4 weeks maximum period

- Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?

Answer: Yes. There are administrative requirements to be submitted in the MADLSA system (Ministry of Administrative Development, Labor and Social Affairs) E.g. Change of Employer form, copy of contract from previous employer, New employer's job offer translated in Arabic, copy of resignation letter.

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?

Answer: Guidelines are provided to all employees in maintaining health, safety and security in the colleague's accommodation. Visitor's policy aligned with the current pandemic restrictions in the country is applicable and implemented.

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. Yes. Summer time working hours is applicable as per law, and monitored by the hotel.

Answer: M&C properties in Qatar do not have employees both direct and casuals staying long period outside their premises during the summer season. However, if required all practices to be implemented are aligned with the labor law in the country.

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.

Answer: Yes. Policies and guidelines are in place to protect both direct and casual employees from COVID – 19 virus. It is regularly updated, and strict implementation is monitored in all M&C properties in Qatar. (Attached: Qatar Clean Guidelines & M&C Policy – Work Safe, Stay Safe.)

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?

Answer: It is our utmost priority to provide our employees with a safe, healthy and engaging environment hence our policies in place are segregated in various sections to ensure there are no loopholes e.g. welfare, working condition, recruitment and selection, performance management, health and safety, accommodation etc. We also have a policy in place for our casual employees (HR Working Condition 001 – Casual Labor). Site visits and casual employee feedbacks are conducted to ensure that their living conditions comply with the labor law. In cases of non-compliance, the hotel coordinates with the suppliers/sub-contractors for the necessary rectification and/or cease the business relationship for severe cases.

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.

Answer: Mandatory guidelines are implemented as per the current pandemic restrictions in the country; hence, it is applicable for all. Random checks are conducted by MOPH (Ministry of Public Health), however, we also conduct our own spot checks both in the hotel and in the colleague's accommodation(Refer to Attached: Qatar Clean Guidelines & M&C Policy – Work Safe, Stay Safe.)

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.

Answer: Yes. Policies are in place (Attached: HR Welfare - 002 Code of Ethics and Business Conduct & HR Welfare 018 – Whistle Blowing Policy).

- 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.

Answer: Yes. Please refer to HR Welfare 018 – Whistle Blowing Policy and HR Welfare 002 - code of conduct and 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)?

Answer: Upon onboarding of new joiners, induction is conducted and orientation (Welcome to our World Module) is done in the next 2 days from joining date. This orientation includes all the company policies and reporting protocols. Refresher sessions are also conducted to update the employees for any changes, and to ensure that these information are retained.

- How are business partners made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?

Answer: Business partners/ Suppliers/Sub contractors go through the same orientation and onboarding modules provided for direct employees.

- Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?

Answer: Policies are in place and direct employees are oriented. (Attached: HR Managing Performance 002 – Grievance Procedure & HR Welfare 002 Code of Ethics and Business Conduct) Casual employees are also oriented with the grievance policy in place.

- What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?

Answer: It is our responsibility to orient both direct and casual employees on the grievance policy and procedures. We also established a strong communication

channel with all our employees through platforms that will allow them to express their concerns.

- 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?

Answer: Once a claim of abuse is raised, full investigation follows immediately with all parties involved to ensure fair procedures are followed.

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?

Answer: two cases of bullying in total

Answer: None.

- Sexual abuse, exploitation, and harassment in its own operations?

Answer: None

- Sexual abuse, exploitation, and harassment in its subcontracted workforce?

Answer: None

Representation & remedy

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

Answer: Each M&C property in Qatar formed a welfare committee wherein members are selected from each hotel departments and monthly meetings are conducted to address and resolve concerns raised by direct and casual employees.

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?

Answer: Direct employees are oriented with the policies related to grievance (Attached: HR Managing Performance 002 – Grievance Procedure & HR Welfare 002 Code of Ethics and Business Conduct) Casual employees are also oriented with the grievance policy. Colleague engagement survey is carried out annually by our regional office for our direct employees and it is made available in several languages that they can select from.

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

- Recruitment costs

Answer: none

- Wages

Answer: Required wages per employee complies with the labor law, however for year

2020, an average of 20% turnover is recorded (20% in total for all four M&C properties in Qatar) due to a more competitive scale in the market that resulted from lack of potential candidates inside the country because of restrictions brought by the pandemic.

- General working or living conditions
Answer: None
- Health and safety?
Answer: None
- How many of these grievances were raised by subcontracted workers?
Answer: None

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?

As a summary for all the responses mentioned above, our top priority in Millennium Hotels and Resorts is to provide a safe and healthy working environment for our colleagues including those provided by subcontractors, business partners, suppliers. We aim to reflect these priorities in our company's vision, which is to be recognized as the hotel group preferred not only by guests, but also by our colleagues and industry partners. In order to fulfill this commitment, we see to it that all our practices adhere to the local labour law and the consistency in all the standards and guidelines implemented are monitored.