



Subject: Response to BHRRC Report

We refer to your email dated 05 June 2023, inviting the Supreme Committee for Delivery & Legacy (SC) to respond to your upcoming report.

All workers under the purview of the SC are covered under the SC's Workers' Welfare Standards (WW Standards) and enforced by the Workers' Welfare Department (WWD). The scope of our programme covers construction workers, and those involved with security services, facility management, housekeeping/clinics, transport, and food and beverage, among others. Through our robust Compliance and Audits mechanism, we continuously monitor companies' compliances with the requirements of the SC WW Standards and Qatar Labour Law and have enforcement measures in place to rectify any non-compliance.

Audit and Inspections: The SC has a robust monitoring system to assure compliance with the Workers' Welfare Standards (WWS) and actively investigates non-compliances. The SC also has a dedicated grievance hotline where workers can anonymously report issues and raise complaints. The SC's audit system includes pre-tender evaluations, ethical recruitment audits, and accommodation and work environment inspections to monitor compliance with the WWS and Qatar Labour Law.

Compliance & Enforcement: A comprehensive set of contractual remedies ensure that the WWS are enforced:

- Rectification at the contractors' cost
- Report the contractor to the Ministry of Labour (MoL) for punitive action
- Black-list or place the contractor on a watch-list to prevent the contractor from being mobilised on other World Cup-related projects until resolution of issues
- Demobilise the contractor from the project

Supply Chain Due Diligence: The SC has embedded its WW Standards within all service agreements, whereby workers' welfare compliance is a contractual obligation. The SC also performs ongoing audits and inspections, as well as conducts worker interviews to gain first-hand insight from workers. A detailed report is issued to all contractors with the required rectifications after completing every audit.

Supply chain due diligence is another vital component of our audit system. All main contractors are obligated to disclose their sub-contractors (including recruitment agents) for SC review. After completing a supply chain risk assessment, the SC provides feedback to contractors on their suppliers' level of compliance, along with a

rectification plan. Contractors must also seek SC approval before mobilising new sub-contractors, thereby creating an additional layer of compliance assurance at the procurement stage. Where a sub-contractor is found to be grossly non-compliant, the SC recommends demobilisation and replacement with a compliant service provider. Critical violations of the Labour Law are also reported periodically to the MoL for legal action.

Recruitment Fees: Both Qatar Labour Law and the WWS strictly prohibit the charging of recruitment fees to workers. SC contractors are also required to utilise recruitment agencies licensed by the MoL and to include ethical recruitment clauses in their agency agreements so that workers would not be illegally charged.

Where SC contractors are unable to demonstrate full payment of the cost of recruitment, workers receive reimbursements in line with universal reimbursement programme. Over 49,000 SC and non-SC workers received reimbursements totaling QAR 86.6 M.

Working Conditions: The SC's pre-tournament due diligence operations included inspections of official and non-official venues to ensure suitable site welfare facilities were in place, such as mess and drinking water facilities, accessible sanitary facilities and necessary medical facilities. Results were shared with venues and rectifications agreed, monitored, and confirmed prior to tournament commencement. A total of 66 sites were covered through pre-event venue welfare inspections.

During the tournament, a detailed inspection plan was prepared with a risk-based prioritisation of sites and contractors. 28 dedicated labour rights inspectors were mobilised in four teams to locations where the largest impact could be made. A total of 8,086 workers were interviewed to assess contractor compliance with Qatar Labour Law, the WWS and other logistical, venue-related issues such as distribution of food and water during work shifts.

Grievance Mechanism: The SC established a three-tier grievance mechanism for workers to share grievances and suggest improvements to welfare and safety, without fear of retaliation. The three tiers include:

- **Workers' Welfare Officers (WFOs):** As mandated by the WWS, Workers' Welfare Officers were appointed by contractors to oversee wellbeing at project sites and accommodation facilities. They were trained to serve as critical focal points for workers. 700 WFOs were appointed at peak.
- **Workers' Welfare Forums (WWFs):** WWFs allow workers to elect representatives from their constituency groups to raise grievances at forums. Forums were mandatory for projects with over 50 workers. Workers' representatives were trained in leadership, teamwork,

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communication, negotiation and conflict resolution, equipping them to share grievances and suggestions for redress with peers and management. 113 WWFs were active at peak.

- **Grievance Hotline:** The SC Grievance Hotline is toll-free and available around the clock in 10 languages allowing workers to raise complaints anonymously. The SC strengthened awareness and uptake of the Hotline before, during, and after the tournament using short informational videos and emails. Over 44,000 awareness cards were distributed to workers from approximately 400 contractors. The SC received over 1,200 complaints in the lead up to and during the tournament, while closing out more than 95% of cases.

Employment Contracts: Short-term workers deployed for the tournament were hired on temporary contracts ranging from three to six months. Salary payments including overtime wages for tournament contractors have been verified in line with Qatar Labour Law. Any personnel recruited from overseas on temporary visas were repatriated due to completion of the scope of work.

Employment Transfers: As of March 2021, workers no longer require exit permits or no objection certificate to change employment. Before transferring, workers must adhere to a notice period and submit all relevant documentation (i.e. signed resignation letter, new offer of employment) to the Ministry of Labour for approval.

Tournament-time: Once the tournament commenced, worker interviews and venue welfare inspections were conducted across stadiums, training sites and non-competition venues over the course of the tournament, to ensure that workers' rights were protected. Where issues were identified, the SC engaged contractors and government authorities to ensure that appropriate actions were taken.