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Main Campaign Report

"We work like robots"

Discrimination and Exploitation of Migrant Workers in FIFA World Cup Qatar 2022 Hotels



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Equidem

Global Labour Justice - International Labour Rights Forum (GLJ-ILRF)

Equidem is a human rights and labour rights charity working globally and locally to promote the rights of marginalised communities, accountability for serious violations, and building the human rights movement. Our team of experts and field investigators expose injustice, provide solutions for the most intractable human rights challenges and work closely with grassroots and global civil society to empower the individual and the community.

Global Labour Justice-International Labour Rights Forum (GLJ-ILRF) is a new merged organisation bringing strategic capacity to cross-sectoral work on global value chains and labour migration corridors. GLJ-ILRF holds global corporations accountable for labour rights violations in their supply chains; advances policies and laws that protect decent work and just migration; and strengthens freedom of association, new forms of bargaining, and worker organisations.

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Abbreviations and Acronyms

ADR	Average Daily Rate
AED	United Arab Emirates Dirham
BHD	Bahraini Dinar
CAGR	Compound Annual Growth Rate
CARC	Compound Annual Rate of Change
CERD	Convention on the Elimination of All Forms of Racial Discrimination
GCC	Gulf Cooperation Council
ILO	International Labour Organization
KAIA	King Abdulaziz International Airport
KD	Kuwaiti Dinar
MEED	Middle East Economic Digest
MEP	Mechanical, Electrical, and Plumbing
MICE	Meetings, Incentives, Conferences, and Exhibitions
NOC	No Objection Certificate
QAR	Qatari Riyal
RevPAR	Revenue Per Available Room
SAR	Saudi Arabian Riyal
SC	Qatar Supreme Committee for Delivery and Legacy
UAE	United Arab Emirates
UN	United Nations
UNGPs	United Nations Guiding Principles on Business and Human Rights
WHO	World Health Organization
WPS	Wage Protection Systems



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Executive Summary

“

For nine months, we were made to work for more than 12 hours a day, without a day off. In order to keep our hours hidden, we were prevented from clocking in and clocking out. I was on the verge of going insane.”¹

AN INDIAN WORKER AT THE HOLIDAY VILLA HOTEL AND RESIDENCE, DOHA, QATAR - A FIFA WORLD CUP QATAR 2022 PARTNER HOTEL.



¹ An Indian worker employed at the Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.



Here, the salary is not about what you bring to the table. I will never get the same salary as an Arab colleague. There is a lot of discrimination against people from Africa. We are only hired in some types of jobs - security, housekeeping, the kitchen.”²

A GHANAIAN WORKER EMPLOYED AT CROWNE PLAZA, THE BUSINESS PARK, DOHA, QATAR - A FIFA WORLD CUP QATAR 2022 HOTEL PARTNER.



We are in direct contact with guests, so female housekeeping staff are not allowed to work alone. We work in pairs-male and female staff together. We do not enter any rooms without a colleague. Housekeeping work is risky-we might get assaulted or accused of stealing. We have to be very careful.”³

A NEPALESE HOUSEKEEPING WORKER AT THE CROWNE PLAZA, WEST BAY, DOHA - A FIFA WORLD CUP QATAR 2022 HOTEL PARTNER.

Migrant workers from Africa and Asia employed at FIFA World Cup Qatar 2022 hotels⁴ have been subjected to serious labour exploitation and human rights violations. Investigations conducted by Equidem and GLJ-ILRF between February 2020 and July 2022 documented significant labour and human rights violations at 13 out of 17 of FIFA partner hotel groups. In this report, women and men from Africa and Asia working at Qatar World Cup hotels describe - in their own words, the sexual

harassment, nationality- and gender-based discrimination, wage theft, health and safety risks, sudden loss of employment, and illegal recruitment charges they faced in their work. The legal and governmental context fuels these rights violations. Workers are denied the fundamental right to associate, subjected to intensive surveillance and employer control, and fear retaliation-including employer-instigated deportation - for defending their rights and interests.

2 A Ghanaian worker employed at Crowne Plaza, The Business Park, Doha. Interviewed in June 2022.

3 A Nepalese worker employed at the Crown Plaza, West Bay, Doha, Qatar. Interviewed in April 2022.

4 We refer to hotels whose services are or have been offered for sale at hospitality.fifa.com as part of the FIFA Official Hospitality Programme by “FIFA World Cup Qatar 2022 hotels” or “FIFA World Cup hospitality partners” and similar language.

These conclusions follow from our in-depth investigation of migrant workers’ employment conditions at FIFA World Cup Qatar 2022 hotels and GCC-region hotels belonging to FIFA World Cup Qatar 2022 multinational hotel partners. 80 migrant workers were interviewed across 32 hotels, including 54 workers employed at hotels belonging to 13 of 17 FIFA World Cup Qatar 2022 partner hotels. The Accor, Dusit, Ezdan Holding Group, InterContinental, Kempinski, Marriott, Mövenpick, Retaj, Ritz, Rotana, Steinberger, Tivoli, and Wyndham hotels investigated employ an estimated 9,000-10,000 workers. Many are migrant workers from Bangladesh, Ghana, India, Indonesia, Kenya, Morocco, Nepal, the Philippines, Thailand, and Uganda.

These violations of workers’ rights at FIFA World Cup Qatar 2022 partner hotels are the predictable result of policies that deny workers their right to associate, permit discrimination based on nationality and migration status, and grant employers control over migrant workers’ rights to move and work, exposing them to discrimination and abuse. As FIFA well knows, Qatar has a “de facto caste system based on national origin, which results in structural discrimination against non-citizens, including as the result of immense power imbalances between employers and migrant workers rooted in the kafala system that historically structured labour relations in Qatar,” according to a UN special rapporteur’s April 2020 finding that the FIFA Human Rights Advisory Board included in its closing report.⁵

5 Fifth Report by the FIFA Human Rights Advisory Board, February 2021, available online at: <https://digitalhub.fifa.com/m/4769eb55b4e22ba5/original/vforeieiz1fh06ld4a36-pdf>.



Addressing the problems identified by our investigation requires the dedicated efforts of the State of Qatar, FIFA, and the multinational hotel groups hosting World Cup guests. Primary responsibility for establishing and effectively enforcing labour rights compatible with international minimums lies with states. However, FIFA acknowledges its own responsibility to uphold workers’ rights in its own operations and those of its event partners.⁶ The multinational hotel groups’ own responsibility to provide decent work must too be acknowledged, along with their power to set and enforce standards in their capacities as hotel owners, operators, and franchisors. Our investigations demonstrate that while some multinational hotel groups have anti-racism and anti-discrimination policies and enforcement plans, they have failed to protect migrant workers at FIFA World Cup Qatar 2022 hotels from racism, discrimination, and abuse.

Qatar has made improvements in its labour regime following its 2010 selection as host of the 2022 FIFA World Cup. Equidem and GLJ-ILRF urge the state to continue its work towards international minimum standards for its over 2 million migrant workers in the years following the Cup. Working with the International Labour Organisation since 2018, Qatar established a non-discriminatory minimum wage, developed an electronic payment system to promote timely and full payment of wages, and established some procedures to identify and remedy violations of workers’ rights. New laws have blunted some of the harshest features of the kafala system, allowing migrant workers more freedom to change jobs without employers’ permission. Qatar, Bahrain, and Saudi Arabia have taken some similar measures to curb employers’ control over workers. Despite recent reforms, significant challenges to implementation and enforcement remain in Qatar and elsewhere, as this report documents.



Image credits: iStock

6 FIFA, *FIFA’s Human Rights Policy*, 2017, available online at <https://digitalhub.fifa.com/m/1a876c66a3f0498d/original/kr05dqyhwr1uhqy2lh6r-pdf>.

Where workers lack the freedom to associate and act collectively, initiatives led by the state, FIFA, and its hotel partners will remain inadequate to provide decent work or address the discrimination and abuse migrant workers suffer. Significant power imbalances between workers and employers will continue to obstruct the exercise and enforcement of migrant workers’ rights under domestic and international human rights law. The law of Qatar, particularly its ban on migrant worker unions, denies workers the freedom to protect their own rights and interests, undermining its workers’ rights initiatives.

More than one million fans and tourists are anticipated at the FIFA World Cup Qatar 2022. Over the course of the 28-day tournament, they will stay in up to 130,000 rooms in hotels

belonging to these 17 multinational hotel groups and others. These global games have the potential to promote respect for human rights not only in the establishments hosting teams and fans, but throughout the hospitality industry and the hotel networks operated by the 17 multinational hotel groups discussed here.

Equidem and GLJ-ILRF wrote to FIFA, the Supreme Committee for Delivery and Legacy, the Qatar authorities, and all of the businesses mentioned in this report prior to publication. Representatives of Accor and Marriott provided responses in relation to their hotels mentioned in the report. Their responses are available in full here: <https://www.equidem.org/reports/we-work-like-robots/responses>.

Table i: FIFA World Cup Qatar 2022 Team Hotels and Rights Violations

FIFA Team	Hotel	Rights Violations
Brazil	Westin Hotel, Doha	<ul style="list-style-type: none"> • Nationality-based wage discrimination • Higher wages promised upon hiring • Recruitment fees
England	Souq Al-Wakra Hotel	<ul style="list-style-type: none"> • Nationality-based wage discrimination and discrimination in promotion • Challenges obtaining NOCs for contract workers • Recruitment fees charged to contract workers • Illegal wage deductions below minimum wage • Exposure to COVID-19 despite workplace precautions

Nationality and Gender-based Discrimination

Equidem and GLJ-ILRF confirmed nationality-based wage discrimination at all 32 of the hotels associated with FIFA World Cup Qatar 2022 hotel partners that we investigated, evidencing nationality- and race-based hierarchies among the estimated 9,000-10,000 workers at investigated hotels. Hospitality workers also reported unequal remuneration due to discrimination based on

gender and other axes of exclusion. While Qatar has a newly enacted non-discriminatory minimum wage, nationality- and gender-based wage discrimination flourishes above that wage floor.

Article 1 of the Convention on the Elimination of All Forms of Racial Discrimination (CERD) expressly prohibits state exclusion based on national origin that nullifies or impairs human

rights. Nevertheless, nationality-based wage discrimination in the hospitality sector across the GCC states is widespread, systematic, and carried out in plain sight. The same is true of gender-based discrimination which ILO Convention 190 condemns. FIFA should have taken immediate action to address these predictable risks by demanding its partner hotels adopt non-discrimination policies and establish wage scales based on job requirements, rather than on workers’ nationality, migration status, or gender.

A Bangladeshi worker at the Centro Capital, Al Jazeera Street, Doha in Qatar - a FIFA World Cup Qatar 2022 partner hotel - described nationality-based wage discrimination:

Superiors make hiring decisions based on nationality rather than experience. For the same bellboy job, an Arab worker will be paid more than us. Here, Bangladeshis are paid less. We fear for our jobs, and we have to tolerate unfair decisions.⁷

The hospitality workers interviewed routinely reported that westerners, Qatari nationals, and Arabic speakers were paid more than Asian and African workers.

When specific salaries were reported, pay discrepancies between different nationalities were drastic, including for this Nepalese migrant worker employed at the Westin Hotel, Doha, Qatar - a FIFA partner hotel - expected to host the Brazilian team:

My salary does not reflect my skill level; it reflects my nationality. Filipina women are paid 1600 (Qatari) rials (\$439) for the same work where we are paid 1000 rials (\$274).⁸

A Westin representative denied nationality-based discrimination at the hotel.

An Indian worker employed at Souq Al Wakra Hotel - the host hotel for the England team - also reported nationality-based discrimination in promotions:

Here, they give preference to Arabic speakers when it comes to promotion.⁹

Another worker employed at the Retaj Al Rayyan Hotel, Doha, Qatar - a FIFA World Cup Qatar 2022 partner hotel - explained:

Your job is tied to your nationality. If you are from Bangladesh or Nepal, then you can’t expect a senior position, even if you have the qualifications. In this hotel, only Egyptians are given promotions.¹⁰

At the Holiday Villa Hotel and Residence in Doha, Qatar - another FIFA World Cup Qatar 2022 partner hotel - workers described wage, hiring, and assignment discrimination against African workers. A Ghanaian worker described his experience at this hotel:

Here, the salary is based on nationality rather than experience. Regardless of our experience, African people are only hired in security, housekeeping, and in the kitchen.¹¹

Another worker from the same hotel explained:

People hired from Africa are paid 200 (Qatari) rial (\$55) less than other staff members with the same jobs.¹²

7 A Bangladeshi worker employed at Centro Capital, Doha, Qatar. Interviewed in April 2022.

8 A worker employed in the food and beverage department at the Westin Hotel, Doha, Qatar. Interviewed in May 2022.

9 An Indian worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

10 A worker employed in the front office of the Retaj Al Rayan, Doha, Qatar. Interviewed in June 2022.

11 A worker employed at the Holiday Villa and Residence, Doha, Qatar. Interviewed in June 2022.

12 A worker employed as a concierge at the Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

Wage Theft

Hotel workers employed by FIFA hotels partners reported wage theft lasting from two to nine months. Some workers received no wages and benefits or smaller wages and fewer benefits than they were owed. Some had their salaries unilaterally cut by between 25% and 75% or were required to work overtime without compensation. These practices violate international labour standards under the ILO Protection of Wages Convention, 1949 (No. 95), which provides for the regular payment of wages, including upon termination.

At the Holiday Villa Hotel and Residence, Doha, Qatar - a FIFA World Cup Qatar 2022 partner hotel - workers reported mandatory and unpaid overtime hours that they were banned from recording. One worker explained:

For nine months, we were made to work for more than 12 hours a day, without a day off. In order to keep our hours hidden, we were prevented from clocking in and clocking out. I was on the verge of going insane.¹³

Workers across departments at the Souq Waqif Boutique Hotel, Doha, Qatar - a FIFA World Cup

Qatar 2022 partner hotel - described being required to work overtime without receiving payment for the time worked at any rate. An Indonesian housekeeping staff member explained:

We work six days a week, for 9-12 hours a day. We work three hours of overtime at least three times a week. They never pay us overtime.¹⁴

At hotels associated with FIFA partner hotel groups, workers reported non-payment and underpayment of wages - especially during successive phases of the COVID-19 pandemic.

An Indian worker employed at Souq Al Wakra Hotel - the host hotel for the England team - reported suddenly losing his job with the outbreak of COVID-19 and receiving no severance pay:

During the pandemic they fired many staff. They told us that within one month we are going to fire you. They paid our tickets to our home countries and gave workers they fired QR 400 (USD \$110) to pay for food until their flight. They did not provide any other payments.¹⁵

Understaffing, Overwork, and Abuse

Migrant workers employed at FIFA World Cup Qatar 2022 hotel partners reported understaffing and overwork, especially in housekeeping departments. Understaffing and overwork heighten the risk of verbal abuse and workplace violence for hotel workers. A Bangladeshi worker at the Holiday Villa Hotel and Residence - a FIFA partner hotel groups - reported routine verbal abuse based on his nationality:

Our supervisor shouts at us all the time. For any small issue, he shouts and threatens to fire us. I continue to work in these conditions because I am afraid to lose my job. We feel discrimination in this workplace. There are very few Bangladeshis working in this company, and we are shouted at more than other workers.¹⁶

Verbal abuse is a form of workplace bullying, and if left unchecked can escalate into physical violence.

13 An Indian worker employed at the Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

14 An Indonesian worker employed at Souq Waqif Boutique Hotel, Doha Qatar. Interviewed in June 2022.

15 An Indian worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

16 A Bangladeshi worker at Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

At the Ezdan Palace Hotel, Doha, Qatar - a FIFA World Cup Qatar 2022 hotel partner - contracted workers in the housekeeping department reported that they were significantly understaffed for the work required, creating high levels of pressure. One worker explained:

There is no way that the number of workers matches the workload. In fact, we are short by half the number of workers required to do the job efficiently. We have to clean 10 rooms in 8 hours. The challenge is the rooms are not all empty at once. It depends on the check-out time of the guests. If our work is not completed on time, we have to work overtime, which means the company will have to pay us for overtime duty. They do not want that. Rather, there is huge pressure for us to complete our work within the working hours.¹⁷

Understaffing and overwork were also reported by workers at the InterContinental Doha, West Bay - another FIFA World Cup Qatar 2022 hotel partner.

A worker, hired directly by the hotel, described overwork in the housekeeping department:

We never get enough rest or sleep when the hotel is busy. We work like robots without food or water continuously, sometimes for 15 hours during peak season. From associates to the management level, if the hotel is busy, we have to stay. We are not paid for these extra hours.¹⁸

At the JW Marriott Marquis City Centre, West Bay, Doha - a FIFA World Cup Partner Hotel - workers in housekeeping described the cumulative toll of working long hours on overnight shifts. A Bangladeshi worker employed by a contractor explained:

I have worked the night shift for the last three years. Sometimes it is very difficult for us to complete all the work assigned to us. Sometimes the supervisors shout. Continuous night shifts using cleaning thinner and chemicals has negatively impacted my health.¹⁹

Gender-Based Violence and Harassment

Our investigation indicated that gender-based violence and harassment (GBVH) is a fact of life for women at some FIFA World Cup Qatar 2022 hotel partners. Forms of gender-based violence named by Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) General Recommendation No. 19 include acts that inflict physical harm, mental harm, sexual harm or suffering, threats of any of these acts, coercion, and deprivations of liberty, including restrictions on freedom of movement. ILO Convention 190, which entered into force in June 2021, reflects global agreement that GBVH has no place in the workplace.

Women workers described sexual harassment from colleagues. A Nepalese housekeeping worker employed at the Crowne Plaza, West Bay, Doha - a FIFA World Cup Qatar 2022 hotel partner explained:

We get sexual remarks from our colleagues often. They tease us. I get comments like, ‘wow, you look so sexy today,’ or ‘your makeup is superb - my heart is swooning,’ sometimes they touch us inappropriately while working together. I cannot say anything because if I do, they will say that it was unintentional, and they will dismiss me. I just ignore comments and advances.²⁰

17 A worker employed in the Housekeeping Department at the Ezdan Palace Hotel, Doha in Qatar. Interviewed in April 2022.

18 A worker employed at the InterContinental Doha, West Bay, in Qatar. Interviewed in June 2022.

19 A Bangladeshi worker employed in Housekeeping at the JW Marriott Marquis City Centre, West Bay, Doha. Interviewed on June 11, 2022.

20 A Nepalese worker employed at Crowne Plaza, West Bay, Doha, Qatar. Interviewed in, April 2022

Guests also perpetrate sexual harassment and violence against hotel workers. At the InterContinental Doha, West Bay - a FIFA World Cup Qatar 2022 hotel partner - women from the hospitality department reported routinely facing sexual harassment from guests, including inappropriate touching and sexual propositions. These events were described as common experiences in the industry, not isolated incidents.

In some hotels, women could not securely report incidents to supervisors. Workers at the Crowne Plaza, West Bay, Doha described a hotel policy of replacing female with male housekeeping workers when guests behaved inappropriately.

Women workers also described hotel policies restricting female workers’ mobility during work hours and at their accommodations.²¹ A Nepalese worker employed at the Crowne

Plaza, West Bay, Doha - a FIFA World Cup Qatar 2022 hotel partner - explained:

As a woman, I face discrimination based on my gender. I have many examples. We have to let security at our accommodation know any time we leave, even if we are going to the supermarket. This does not apply to male workers. We have to report the time we will return to the hotel or the accommodation and inform security. If male workers stay out - even all night - and then report for their duty directly, no one will question them. We have to be at our accommodation camps by 9 pm, even on our days off.²²

In a context in which forms of GBVH are socially sanctioned and normalised, FIFA World Cup Qatar 2022 hotel partners must proactively establish effective protection measures to provide women employees a work and living environment free of such harms.

Health and Safety Risks

Equidem and GLJ-ILRF found that across the region, hotels exposed their staff to extreme health risks during the successive waves of the COVID-19 pandemic, denying workers their fundamental rights. In May 2022, the ILO recognised that the right to “a safe and healthy working environment” is fundamental, meaning that all ILO members are obligated to promote and respect that fundamental principle.²³

Each of the 80 hotel workers Equidem and GLJ-ILRF spoke to across the 32 hotels investigated knew of someone from their workplace who had contracted COVID-19. In some cases, COVID-19 spread rapidly among hotel staff. In most cases, hotel workers who fell ill were taken to government hospitals and then

quarantine centres. While some workers had access to health insurance and health services through their employers, others, even within the same hotels, did not.

A Bangladeshi worker at the Mövenpick Hotel West Bay in Doha, Qatar - a FIFA World Cup Qatar 2022 partner hotel - described pressure from management to work against his will at the risk of exposing himself and other workers to COVID-19 before vaccines were released on the global market:

The (Qatari) government booked the whole hotel for COVID-19 patients. Management offered us work with salary. If we refused to work, we would still receive food and

21 Gender-based restrictions on mobility are another form of GBVH, per CEDAW General Recommendation No. 19 - one that is systematically perpetrated against women hotel workers in Qatar.

22 A Nepalese worker employed at Crowne Plaza, West Bay, Doha Qatar. Interviewed in April 2022.

23 ‘ILO Declaration of Fundamental Principles and Rights at Work’ (ILO, 1998, amended 2022), available online at: <https://www.ilo.org/declaration/lang--en/index.htm>.

accommodation, but no salary. At first, many of us refused to work. Then we received serious pressure from management to work.²⁴

At this hotel, receiving wages was made contingent upon accepting high levels of exposure to COVID-19. Accor, owner of Mövenpick hotels, said that assignments were changed to avoid redundancies and that numerous precautions were taken to prevent the spread of disease.

Workers at the Crowne Plaza, West Bay, Doha, Qatar - a FIFA World Cup 2022 partner hotel - reported that almost 40% of hotel employees contracted COVID-19. Workers who continued to report for duty

during the pandemic described not only risks to their wellbeing but also adverse effects on their mental health as they watched their colleagues fall ill.²⁵

An Indian worker employed through a contractor at Souq Al Wakra Hotel - the host hotel for the England team - also reported an outbreak of COVID-19 among his colleagues, despite workplace precautions:

We followed the Qatar government rules. We maintained social distance and used face masks and sanitisers. At least 20-25 of my colleagues contracted COVID-19.²⁶

Abusive Workforce Downsizing

When FIFA World Cup Qatar 2022 ends, over one million fans and tourists will leave the country. Emptying an anticipated 130,000 hotel rooms, the end of the games will significantly change hotel occupancy. Our research found that when hotel demand ebbs, migrant workers often experience abrupt layoffs and terminations with dire consequences for their ability to support themselves.

Our investigation documented a pattern of abrupt termination, ad hoc downsizing, lack of notice prior to termination, and denial of termination benefits at FIFA World Cup Qatar 2022 partner hotels, and at hotels associated with the same multinational hotel groups in Bahrain, Kuwait, Qatar, Saudi Arabia, and the UAE. These practices disproportionately impacted migrant workers.

At the Holiday Villa Hotel and Residence, for instance - a FIFA World Cup Qatar 2022 partner hotel - a Ghanaian worker explained:

I was laid off because the hotel reduced staff during the (COVID-19) pandemic. They did not give me any notice or (severance) payment. I reported for duty, and they simply told me to return to the accommodation. Three weeks later, I was laid off.²⁷

In some cases, hotels linked to FIFA multinational hotel group partners were shut down entirely, and hundreds of workers lost their jobs at once. An Indian housekeeping supervisor, employed at the Voco Dubai hotel in the UAE, described the distinct impact of rapid downsizing on workers from different demographics.

Almost 200 staff members were terminated without prior notice - that is almost 30% of the staff. They terminated workers who did not complete school and did not hold professional positions first. These changes in payroll mainly impacted migrant workers.²⁸

24 A Bangladeshi worker employed at the Mövenpick Hotel West Bay, Doha. Interviewed in June 2022.

25 A Nepalese worker employed at Crowne Plaza, West Bay, Doha, Qatar. Interviewed in April 2022.

26 An Indian worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022. Other workers employed at this site estimated that infections ranged from 12 to 25 workers, but in the absence of publicly available information or a response from the hotel on this issue we cannot assess whether this represents the total number of infections at the site.

27 A worker formerly employed at Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

28 An Indian worker employed at the Voco Dubai, UAE. Interviewed in January 2021.

Recommendations

I. Urgent Action FIFA Can Take to Protect Labour Rights in the Hotel Sector

A. Call for Immediate Action from Hotel Partners

Equidem and GLJ-ILRF welcome FIFA’s efforts to promote human rights, including by encouraging national football associations to do their own due diligence on hotels in Qatar. Multinational hotel groups have unique capacity to set and enforce industry standards in the hotel sector. This includes not only the ability to ensure that their hotel partners abide by multinational branding and service standards, but also that all workers employed in their hotels are protected by fair employment contracts, rigorous assessment to mitigate labour and human rights risks, and adequate remedy procedures to address labour and human rights harms.

Call for FIFA World Cup Qatar 2022 hotel partners to immediately adopt and enforce labour and human rights due diligence and remedy standards in Qatar and across their regional hotels

FIFA should require its multinational hotel group partners²⁹ to immediately adopt rigorous labour and human rights standards, processes for ensuring that these standards are achieved across all properties, and effective processes for remediation in cases of rights violations.

1. Require all partner hotels to affirmatively demonstrate compliance with international labour standards, especially in high-risk areas, and require hotel partners prepare and fund responsible workforce downsizing plans and practices. FIFA partners should be encouraged to undertake regionally informed approaches to identifying and remediating discrimination, wage theft, understaffing and overwork, workplace violence and harassment and occupational safety and health.
2. Contribute to emergency funds, and require contributions from subcontractors, that are sufficient to ensure provision of owed wages, severance pay, relocation costs, health insurance, and on-site emergency health care.
3. Establish health standards for workplaces and employer-provided housing, including robust COVID-19 protocols to manage potential future outbreaks, measures to ensure that workers are not pressured to risk their health to keep their jobs and systems that secure high-quality medical care to all workers who do fall sick on the job.
4. Address regional risk factors and draw from good practices in the region in developing effective protocols and practices to protect workers’ rights consistent with international conventions and standards.

²⁹ See supra note 4.

B. Call for Immediate Action and Long-term Reform from Qatar

Call on Qatar to address the range of rights violations facing migrant workers in inspections, during, and after the FIFA World Cup Qatar 2022

FIFA’s local partner for delivery of the Qatar World Cup infrastructure, planning and operations, the Supreme Committee for Delivery and Legacy has been actively auditing the hotel sector. A Kenyan worker employed at Souf Al Wakrah Boutique Hotel - a FIFA partner hotel groups - described regular government inspections:

They come frequently and unexpectedly without being identified as government officials until they have left. They will come and look at the rooms, the services offered, and working conditions and then leave.³⁰

As they continue to undertake planned hotel inspections, the Qatar Supreme Committee for Delivery and Legacy has a critical role to play in ensuring labour and human rights standards are enforced. The Committee should ensure that planned labour rights inspections include the following:

- A** Processes for identifying and remediating wage discrimination, wage theft, understaffing and overwork, workplace violence and harassment, and health and safety risks
- B** Responsible workforce downsizing plans and practices
- C** Engagement with migrant workers in a manner that enables workers to share their concerns while protecting workers’ privacy and safeguarding workers from retaliation

1. Call on Qatar to commit to recognising the freedom of association and workers’ right to join or form a trade union irrespective of nationality, identity or background

The persistent discrimination and rights violations documented here cannot be ended without action by the state of Qatar to enshrine the fundamental rights to associate, organise, and bargain collectively. These rights are the cornerstone on which real reform must rest. Through freedom of association, workers may identify common goals and create an organisation capable of pursuing them, bringing worker power to bear on a consistent basis to transform workplace relationships. Fully protected and empowered workers’ organisations provide a worker-led platform for advocating for internationally recognised workers’ rights, securing their enforcement, and remaking workplaces marred by the products of power imbalances - discrimination, abuse, and other workers’ rights violations.

Qatar’s recent work on joint labour management committees with the ILO represents a first step towards recognising the power of workplace cooperation, but recognition of workers’ fundamental right to associate remains distant. Absent substantial reforms to protect the independence and empower workers’ organisations, these cooperative efforts threaten management subversion of workers’ organisations. They do not provide the protections from anti-union discrimination, among other employer actions, that workers need to exercise their full freedom of association.

FIFA should call on the State of Qatar to extend its leadership in the region by recognising and implementing the rights to associate, organise, and bargain as defined by the ILO.

30 A Kenyan worker employed at Souq Al Wakrah Boutique Hotel, Doha, Qatar. Interviewed in June 2022.

2. **Call on the Qatar authorities to support the establishment of a genuinely independent Migrant Worker Centre**

Given the extreme power imbalances between migrant workers and employers in Qatar, migrant workers are at significant risk for discrimination and exploitation.

The nationality-based racial hierarchies in Qatar, moreover, are entrenched by policies that deny

migrant workers paths to long-term residency or permanent citizenship.

In this context, migrant workers require forums for collective action to safeguard their rights and promote their interests. Establishing a genuinely independent Migrant Worker Centre in Qatar is a key first step towards advancing freedom of association and creating a modern, rights-respecting labour system in Qatar.

II. Recommendations for FIFA to Improve its Performance on Human Rights Beyond the World Cup Qatar 2022

Include detailed guidelines for all sectors engaged in providing World Cup services, including but not limited to the hotel sector

1. Looking past 2022, we call on FIFA to be consistent with September 2018 recommendations from the FIFA Human Rights Advisory Board, issue sector-specific guidelines and procedures for enforcing labour

and human rights standards across all sectors engaged in providing World Cup services, including but not limited to the hotel sector.

2. Issue guidelines to address nationality-and gender-based discrimination, wage theft, understaffing and overwork, workplace violence and harassment, health and safety risks, and sudden loss of employment.

III. Guidance for Qualifying Teams and Spectators in Selecting Hotels at FIFA World Cup Qatar 2022

Reports documenting human rights violations against migrant workers in Qatar have put football teams on high alert, with players from teams including Germany, the Netherlands, and Norway protesting against human rights abuses. As qualifying teams and spectators select their hotels for the FIFA World Cup Qatar 2022, they have an opportunity to improve working conditions for migrant workers in the hotel sector.



Image credit: Alamy

As you select your hotel for the FIFA World Cup Qatar 2022, let hotels you consider know that their human and labour rights track record is important to you in determining where you will stay.

3. Before making your booking, check whether the hotel takes adequate measures to safeguard the rights of migrant workers.
4. After making your booking, check whether the hotel is enforcing measures to safeguard the rights of migrant workers.



Image Credit: Alamy

Questions to ask the hotel prior to and after booking

Wages	<ul style="list-style-type: none"> • Do you have transparent salary grades that determine wages based on objective criteria, including responsibilities, skills, and experience? • Are all of your workers paid in full on a timely basis, including for overtime hours worked? • Can you produce proof that all of your workers are paid in full in a timely manner through WPS documentation of wage transfers?
Hours	<ul style="list-style-type: none"> • How many hours a day do employees work? • How many breaks are they given, and how long are break times? • Do employees have a choice on whether or not to work overtime? • Do you pay workers for any overtime hours they work?
Occupational health and safety	<ul style="list-style-type: none"> • What measures do you have in place to safeguard employees from contracting COVID-19? • Do you provide health insurance for all of your employees? • Do all of your employees have access to medical care and paid sick leave? • What are your emergency health protocols in case a worker becomes sick or is injured at work?
Living conditions	<ul style="list-style-type: none"> • Does your hotel provide workers with accommodation? • If yes, how many workers share a room? • What measures do you have in place at worker accommodation sites to safeguard workers from the spread of COVID-19 in the instance of another outbreak?

Methodology

The research for this report was conducted between February 2020 and July 2022 in Qatar, Bahrain, Kuwait, Saudi Arabia, and the United Arab Emirates (UAE) and in migrant workers’ countries of origin—including Bangladesh, India, Nepal, and Kenya. The time frame of this study provides insight into the experiences of migrant workers employed in the hospitality sector in the GCC States in the two years leading up to FIFA World Cup Qatar 2022, and at various stages of the ongoing global COVID-19 pandemic. Our investigation includes the experiences of 80 migrant workers across 32 hotels, which together employ an estimated 9,000-10,000 workers (Table 3). Our investigation directed special attention to workers employed in hotels belonging to FIFA multinational partner hotels groups—including Accor, Dusit, Ezdan Holding Group, InterContinental, Kempinski, Marriott, Mövenpick, Retaj, Ritz, Rotana, Steinberger, Tivoli, and Wyndham (Table 1).

Migrant worker interviews were carried out on a one-to-one basis, in-person and remotely over the phone, in line with social distancing and other COVID-19 guidelines set by authorities in these countries and the World Health Organisation (WHO). Our investigation included extended

structured interviews and shorter unstructured interviews. This approach allowed us to engage with the maximum number of migrant workers employed on selected sites, utilizing a detailed questionnaire where possible, but also incorporating unstructured testimony when time and access constraints prohibited extended engagement.

Women and men working in low-wage jobs in the Gulf live in an environment of high surveillance, little privacy, and significant physical and mental stress. As part of this extensive investigation, our investigators reached out to 807 migrant workers across the region. While 80 workers agreed to have their experiences recorded, most refused due to fear of retaliation. Considering the high level of risk workers face, all interviews were conducted with the informed consent of the participants in private locations to respect confidentiality in line with Equidem and GLJ-ILRF duty of care policy and procedures. All the workers interviewed requested that their identity not be revealed. Accordingly, we have not used any names in the report to shield workers from the risk of retaliation from their employers or the state.

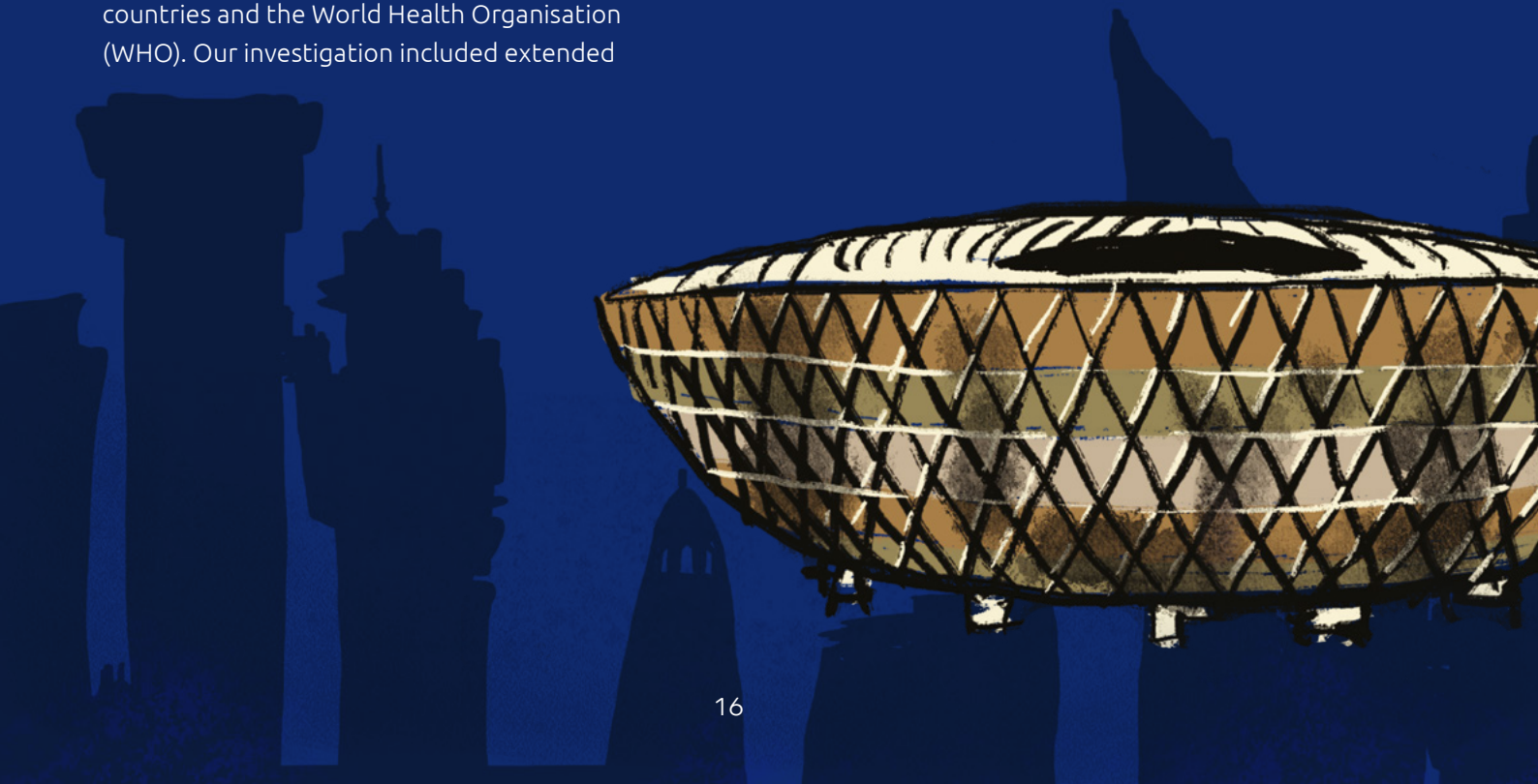


Table 1: FIFA World Cup Qatar 2022 hotels investigated

Country	FIFA World Cup Qatar 2022 hotel partners	Number of Workers interviewed
Qatar	Centro Rotana Hotel, Doha	55
	Crowne Plaza, The Business Park, Doha	
	Crowne Plaza Doha West Bay, Doha	
	Dusit Doha Hotel, Doha	
	Ezdan Palace, Doha	
	Holiday Villa Hotel and Residence, Doha	
	Intercontinental, West Bay, Doha	
	Intercontinental Doha—The City, Doha	
	Kempinski Residences and Suites	
	Marriott Marquis, City Centre, West Bay	
	Marsa Malaz Kempinski, The Pearl—Doha, Costa Malaz Bay, Doha	
	Mövenpick Hotel West Bay Doha	
	Pullman Hotel, Doha West Bay	
	Retaj Al Rayyan Hotel, Doha, Qatar	
	Sharq Village and Spa, Doha	
	Sheraton Grand Doha Resort and Convention Hotel	
	Souq Al Wakra Hotel	
Souq Waqif Boutique Hotel, Doha		
Steinberger Hotel, Doha		
Westin Hotel, Doha		

Table 2: Regional keys belonging to FIFA World Cup Qatar 2022 hotel partners investigated

Country	Site	Number of Workers interviewed from FIFA World Cup Qatar 2022 hotel partner regional keys
Bahrain	Hotel InterContinental, Manama	25
Kuwait	Courtyard by Marriott, Kuwait City	
	JW Marriott Hotel, Kuwait City	
	Ramada Encore by Wyndham, Kuwait Downtown	
Saudi Arabia	Holiday Inn Riyadh-Olaya, Riyadh	

Table 2: Regional keys belonging to FIFA World Cup Qatar 2022 hotel partners investigated (Continued...)

Country	Site	Number of Workers interviewed from FIFA World Cup Qatar 2022 hotel partner regional keys
UAE	Fairmont Hotels and Resort, Abu Dhabi	25
	Hotel Intercontinental, Dubai	
	JW Marriott Marquis Hotel, Dubai	
	Le Royal Meridien, Abu Dhabi	
	Marriott Palm Jumeirah, Dubai	
	Rose Rayhaan by Rotana Voco, Dubai	

Table 3: Multinational Hotel Groups and Hotel Keys Investigated in the GCC

Multinational Hotel Group	Hotels
Accor	Fairmont Hotels and Resort, Abu Dhabi, UAE
Dusit	Dusit Doha Hotel, Doha, Qatar
Ezdan Holding Group	Ezdan Palace Hotel, Doha, Qatar
InterContinental Hotels Group	Crowne Plaza, The Business Park, Doha, Qatar
	Crowne Plaza Doha West Bay, Doha, Qatar
	Intercontinental, West Bay, Doha, Qatar
	Intercontinental Doha—The City, Doha, Qatar
	Holiday Villa Hotel and Residence, Doha, Qatar
	Hotel Intercontinental, Manama, Bahrain
	Holiday Inn Riyadh, Olaya, Saudi Arabia
	Hotel Intercontinental, Dubai, UAE
	Voco Dubai, UAE
Kempinski	Kempinski Residences and Suites, Doha, Qatar
	Marsa Malaz Kempinski, The Pearl—Doha, Costa Malaz Bay, Doha, Qatar
Marriott	Marriott Marquis, City Centre, West Bay, Doha, Qatar
	Westin Hotel Doha, Qatar
	Sheraton Grand Doha Resort and Convention Hotel, Doha, Qatar

Table 3: Multinational Hotel Groups and Hotel Keys Investigated in the GCC (Continued...)

Multinational Hotel Group	Hotels
Marriott	Courtyard by Marriott, Kuwait City, Kuwait
	JW Marriott Hotel, Kuwait City, Kuwait
	JW Marriott Marquis Hotel, Dubai, UAE
	Le Royal Meridien, Abu Dhabi, UAE
	Marriott Palm Jumeirah, Dubai, UAE
Mövenpick	Mövenpick Hotel West Bay Doha, Qatar
Pullman	Pullman Hotel, West Bay, Doha
Retaj	Retaj Al Rayyan Hotel, Doha, Qatar
Ritz	Sharq Village and Spa, Doha, Qatar
Rotana	Centro Rotana Hotel, Doha, Qatar
	Rose Rayhaan by Rotana, Dubai, UAE
Steinberger Hotel Group	Steinberger Hotel, Doha, Qatar
Tivoli Group	Souq Waqif Boutique Hotel, Doha, Qatar
	Souq Al Wakra Hotel Qatar by Tivoli, Al Wakrah, Qatar
Wyndham	Ramada Encore by Wyndham, Kuwait Downtown, Kuwait

We selected hotels for investigation using a purposeful sampling method aimed at identifying information-rich cases that would surface not only the structure of rights violations experienced by migrant workers across the hospitality sector in the region, but also identify good practices that could serve as industry benchmarks in developing labour rights protection frameworks for workers in the region’s hospitality sector. Our case studies sought to identify the structural features of employment in the hospitality sector, using our assessment of employment practices on individual worksites to develop a regional and sectoral employment context. This approach provides a framework for understanding and improving state, employer, and multinational corporate action in the arenas of labour standards and social protection for hospitality sector workers in the Gulf.

While research on labour and human rights violations often focuses exclusively on documenting violations, our research protocol sought to identify violations in relationship to broader employment practices. Accordingly, interviews focused on not only understanding the experiences of individual workers, but also the employment practices in the hotels where they worked. We focused on the process of migrating for employment, the nature of work, wages and hours, occupational health and safety, hiring and termination practices, and access to relief for rights violations. In order to ensure that our analysis incorporated distinctions in employment practices based on skill levels, departments, roles, and hiring grades, we purposefully selected respondents employed in a wide range of roles in the hospitality sector (Table 4).

Table 4: Range of respondent occupations within the hospitality sector

Department	Role
Front/reception	Bell Attendant
	Front Desk Concierge
Security	Security Guard
	Scanning Machine Operator
	CCTV Operator
Office	Front Office Supervisor
	IT Professional
	Office Administrator
	Telephone Attendant
	Accountant
Housekeeping	Housekeeping Supervisor
	Assistant Housekeeping Manager
	Housekeeping Staff
	Floor Cleaner
	Laundry Attendant
Stewards	Chief Steward
	Steward
Dining	Senior Supervisor, Kitchen
	Hostess
	Banquet Waiter
	Food and Beverage Attendant
	Chef
	Demi Commis Chef
	Kitchen Assistant
Transportation	Driver
	Valet
Recreation	Hotel Recreation Supervisor
	Spa Manager
Maintenance	Electrician

FIFA Commitments to Labour and Human Rights

1

In 2010, FIFA selected Qatar to host its quadrennial international men’s football championship contested by the senior national teams of the member associations of FIFA. Despite decades-long concerns about the treatment of migrant workers³¹ and restrictions on wider civil and political rights in Qatar,³² FIFA’s host selection process did not include any human rights assessments.³³ In response to the human rights impacts of hosting the World Cup in Qatar, and a pattern of egregious worker rights abuses during the 2014 World Cup in Brazil

and the 2018 World Cup in Russia, the global labour movement and human rights advocates organised sustained campaigns to pressure FIFA into addressing practices that have resulted in dangerous, exploitative jobs in Qatar. In 2016, FIFA announced the bidding process for the 2026 World Cup would include a human rights requirement for the first time in the tournament’s history, and, in 2017, the organisation adopted a human rights policy within its fundamental statute.³⁴



31 Amnesty International Report 2021/22, p. 306, available online at: <https://www.amnesty.org/en/documents/pol10/4870/2022/en/>

32 U.S. Department of State, Bureau of Democracy, Human Rights and Labor, “2021 Country Reports on Human Rights Practices: Qatar”, available online at: <https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/qatar>

33 In May 2015, Building and Wood Workers’ International (BWI) filed a complaint against FIFA for failing to engage in due diligence and address large scale human rights violations against migrant workers building World Cup facilities. FIFA’s Bidding Agreement for the FIFA 2022 World Cup did not have any requirement to address human or labour rights. Available online at: <https://mneguidelines.oecd.org/database/instances/ch0013.htm> and <https://www.business-humanrights.org/en/latest-news/building-and-wood-workers-international-files-oecd-complaint-against-fifa-for-human-rights-concerns/>

34 FIFA, “Guide to the Bidding Process for the FIFA World Cup”, available online at: <https://digitalhub.fifa.com/m/5730ee56c15eeddb/original/hgopypqftviladm7q90-pdf.pdf>

FIFA Human Rights Advisory Board

To realize these new human rights requirements, in 2017 FIFA appointed a Human Rights Advisory Board. The first Board was composed of eight international experts in human and labour rights and anti-corruption issues, including representatives from the United Nations (UN) system, trade unions, civil society, and business. In 2017, the Human Rights Advisory Board released an overview of FIFA’s progress across core areas of responsibility, including adopting a human rights policy commitment, embedding it throughout the organisation, identifying and addressing human rights risks, tracking and reporting on implementation, and enabling access

to remedy. The 2017 report included a slate of recommendations covering specific as well as systemic issues. The initial 2-year mandate for the Human Rights Advisory Board was renewed in 2019.

In December 2020, however, the Board was disbanded. In their final report, the Board advised that (1) FIFA should embed human rights oversight within its internal governance structures, and (2) FIFA should obtain independent evaluation of its human rights efforts through the entire life cycle of the FIFA World Cup Qatar 2022. FIFA claims to have integrated much of this oversight function internally—although this is disputed.

FIFA Collaboration with Qatar’s Supreme Committee for Delivery and Legacy

Established in 2011 by the State of Qatar, the Supreme Committee for Delivery & Legacy (SC) is responsible for Qatar’s planning, operations, and the delivery of infrastructure for the 2022 FIFA World Cup.³⁵ The SC is also responsible for ensuring that businesses engaged in World Cup construction, infrastructure, hospitality and other projects adhere to its “Worker Welfare Standards.” The Worker Welfare Standards are a set of mandatory principles on workforce health, safety, wellbeing,

security and employment conditions that apply to all businesses involved in stipulated World Cup projects, including sub-contractors and suppliers.³⁶

The SC has struggled to ensure significant compliance with its Worker Welfare Standards over the course of World Cup preparations, as highlighted in investigations by human rights groups and journalists.³⁷ But in a September 2018 report, FIFA’s Human Rights Advisory Board³⁸

35 Business and Human Rights Resource Centre, “Qatar: Supreme Committee for Delivery & Legacy launches Workers’ Welfare Standards, initiates internal and external monitoring for 2022 World Cup contracts, March 6, 2017, available online, <https://www.business-humanrights.org/en/latest-news/qatar-supreme-committee-for-delivery-legacy-launches-workers-welfare-standards-initiates-internal-and-external-monitoring-for-2022-world-cup-contracts/> Taken from “Overview” section of SC LinkedIn page please reference properly. Available online at: <https://www.linkedin.com/company/supreme-committee-for-delivery-&-legacy/about/>

36 Worker Welfare website, Supreme Committee for Delivery and Legacy, available online at: <https://www.workerswelfare.qa/en/workers-welfare>.

37 Amnesty International “The Ugly Side of the Beautiful Game: Exploitation of migrant workers on a Qatar 2022 World Cup site”, March, 2016, available at: <https://www.amnesty.org/en/documents/mde22/3548/2016/en/>. Also see Human Rights Watch, “Qatar: Wage Abuses by Firm in World Cup Leadup”, March, 2022, available online at: <https://www.hrw.org/news/2022/03/03/qatar-wage-abuses-firm-world-cup-leadup> and Paras Shah “Undercover Investigation Reveals Abusive of Migrant Workers at Qatar World Cup Sites”, the Click, December 14, 2021, available online at: <https://theclick.news/world-cup-worker-abuses/>

38 FIFA Human Rights Advisory Board, 2018, “Second Report by the FIFA Human Rights Advisory Board” p. 57-62, available online at: <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf>.

laid out progress by Qatar’s Supreme Committee for Delivery and Legacy toward the FIFA World Cup in Qatar, including in the following areas: eliminating recruitment fees by taking proactive measures – namely, that where a contractor cannot demonstrate that they have paid the costs of recruitment for a worker, the contractor must automatically reimburse the worker an amount in line with ILO estimates.

The Human Rights Advisory Board also identified areas with persistent challenges for construction workers. These include contractors

failing to enforce overtime limitations and persistent unpaid overtime, exclusion of Building and Woodworkers International, the global union federation for the construction industry, from SC investigations of workplace injuries and fatalities, of nationality-based wage discrimination, and of impact of heat stress on workers. The Board identified issues connected to grievance mechanisms, worker representation, and disciplinary procedures as priority areas for further intervention.

FIFA Guidelines Addressing Multinational Companies Engaged in Providing World Cup Services

While attention to human and labour rights in FIFA facilities is overwhelmingly focused on the construction sector, the Advisory Board called upon FIFA to engage companies linked to the World Cup to support respect for international labour rights standards:

FIFA should be actively encouraging other companies linked to FIFA World Cup-related construction in host countries, such as major hotel companies, to support respect for international labour rights standards, as well as

the adoption of independent labour monitoring practices, in connection with their operations. Good practices developed by FIFA and its local partners in specific contexts should be shared with a wider audience in the long-term interests of workers and the FIFA World Cup brand.³⁹

The Advisory Board also called upon FIFA to identify predictable risks to the exercise of civil and political rights, including issues of freedom of association and anti-discrimination.⁴⁰

39 FIFA Human Rights Advisory Board, “Report by the FIFA Human Rights Advisory Board”, September 2017, available online at: <https://digitalhub.fifa.com/m/684bc3b9ec3f4811/original/ab2ywftc8qle92nghiee-pdf.pdf> and “Second Report by the FIFA Human Rights Advisory Board” p. 57, available online <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf>.

40 FIFA Human Rights Advisory Board, “Report by the FIFA Human Rights Advisory Board”, September 2017, available online at: <https://digitalhub.fifa.com/m/684bc3b9ec3f4811/original/ab2ywftc8qle92nghiee-pdf.pdf> and “Second Report by the FIFA Human Rights Advisory Board” p. 63 and 72-62, available online at: <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf>.

Risk Factors for Human and Labour Rights Violations in the Hospitality Sector 2

The United Nations Guiding Principles on Business and Human Rights (UNGPs) call for business enterprises to carry out human rights due diligence to identify, prevent, mitigate, and account for how they address their adverse human rights impacts (Article 17). The UNGPs call upon business enterprises to (a) avoid causing or contributing to adverse human rights impacts and address such impacts when they occur; and (b) seek to prevent or mitigate adverse human rights impacts linked to their business relationships (Article 13). Accordingly, business enterprises must identify and assess any actual or potential adverse human rights impacts with which they may be involved—either through their own activities or because of their business relationships (Article 18).

The slate of rights violations documented in this report is rooted in laws and employment practices in Qatar and other GCC countries that ensure

that FIFA World Cup Qatar 2022 hotel partners and other hotels have access to a hiring pool of migrant workers, while systematically excluding these workers from adequate labour, employment, and social protections. This ecosystem poses significant risks for unchecked rights abuses, including nationality-based discrimination, wage theft, understaffing and overwork, workplace violence and harassment, health and safety risks, and sudden loss of employment.

As outlined in this section, risk factors for labour and human rights abuses in FIFA World Cup Qatar 2022 hotel partners and their regional keys include (A) widespread employment of migrant workers in (B) temporary positions, where workers are (C) subjected to employer control without (D) adequate labour standards protections, including the freedom of association protections required to enforce labour standards.

A. Migrant Status as a Risk Factor for Abuse

Leading up to the FIFA World Cup 2022, FIFA was made well aware of the risks migrant workers in Qatar faced. The first report issued by the now disbanded FIFA Human Rights Advisory Board established that migrant workers are particularly vulnerable to human rights abuse. These vulnerabilities are caused by long-standing migration and employment policies and practices. In Qatar and other Gulf Cooperation Council (GCC) countries, as oil prices fell in the 1980s, countries cut private sector costs by substituting Arab workers for migrant workers.⁴¹ Across the region, migrant workers were systematically excluded from integration measures and labour rights protections. In this way, employers secured not only a low wage but also a vulnerable workforce that is particularly susceptible to labour and human rights violations.⁴²

Migrant workers in the hospitality sector also face these risks. Since the 1990s, the tourism and hospitality sectors in the GCC have steadily grown. Due to their presence as the dominant workforce during the growth of the hospitality sector, South Asian migrants filled most “unskilled” jobs. However, because of workforce nationalization efforts and diversification policies,

an increasingly diverse pool of migrant workers now find employment in the hospitality sector in the GCC countries. In recent years, employers in GCC countries have increasingly focused on diversifying the Asian workforce by hiring African workers.⁴³ These diversification policies have enabled employers to counter labour claims by well-established migrant communities, countries of origin seeking better protection for their nationals, and human rights defenders taking action to secure rights protections and enforcement.⁴⁴

In light of these conditions and widespread documentation of risks facing migrant workers, the Human Rights Advisory Board noted that it is incumbent on FIFA to have a clear position on the rights of migrant workers in Qatar. The Human Rights Advisory Board has also stated that the legal protections migrant workers are afforded should be in line with international labour rights and standards. In their final report, the Board raised concerns with FIFA about substantial delays between the identification of impacts suffered by migrant workers (e.g., wage theft or non-reimbursement for fees) and the actual remediation of those impacts.

B. Temporary Work as a Risk Factor for Abuse

Economic development or “vision” plans in Qatar and other Gulf states have provided a regionally linked framework for various labour market policies and reforms. This regional pathway to economic development depends upon migrant labour because local workforces are insufficient to meet these development blueprints. To pursue National Vision Plans in Qatar and across the region, Gulf

governments have advanced policies that create a ready migrant workforce, whose right to work depends on employers, who are able to hire and fire at will to match the surges and dips in the market demand for labour. In this context, market dominant GCC nationals are legally set up to wield significant levels of control over migrant wage workers through labour market deregulation and the kafala

41 Mehdi Chowdhury and S. Irudaya Rajan, *South Asian migration in the Gulf*, (London: Palgrave Macmillan, 2018), p.55.

42 Piyasiri Wickramasekara, “South Asian Gulf migration to the Gulf: a safety valve or a development strategy?” *Migration and Development* 5, no. 1 (2016): 106, available online at: <https://doi.org/10.1080/21632324.2015.1039770>

43 Ibid.

44 Ibid.

system — an employer-sponsorship model of tying workers to a single employer as a condition of entry, right to work, and legal stay in the country.⁴⁵ Migrant workers have no pathway to inclusion within the GCC as citizens, and instead hold a contingent status with substantially less labour protections and access to state social protection than those of nationals.

The hospitality sector plays a pivotal role in these National Vision Plans. Growth in the aviation industry has also increased the role of GCC countries as international travel hubs, allowing the hospitality industry to capitalize on the stopover market. Furthermore, in the UAE and Qatar, major

international events such as the Dubai Expo, the Qatar Grand Prix, and the FIFA 2022 World Cup play a particularly important role in attracting tourists.

While workforce nationalization initiatives seek to reduce the number of migrant workers across GCC countries, these policies prioritize nationalizing professional and managerial positions. Due to reliance on “unskilled” labour across the hospitality sector, migrants will likely continue to constitute a sizable part of the workforce in these industries. Consequently, the hospitality sector will continue to be an important sector for defending the rights of migrant workers.

Table 5: Overview of GCC Vision Plans by Country

Country (Year of Publication)	Vision Plans
Bahrain (2008)	Vision Plan 2030: Shifting the economy to a productive, globally competitive economy, shaped by the government and driven by a “pioneering” private sector. ⁴⁶
Kuwait (2017)	Kuwait Vision 2035: Turning the country into a regional financial and cultural hub by 2035 through 164 strategic development programs. The Vision also aims for a reduction in the proportion of expatriates in the population to 60% by the end of 2020, but this has been delayed. ⁴⁷
Qatar (2008)	Qatar National Vision 2030: The vision aims for suitable economic diversification’, by which is understood a diversified economy that gradually reduces its dependence on hydrocarbon industries, enhances the role of the private sector and maintains its competitiveness. ⁴⁸

45 ILO, *Employer-Migrant Worker Relationships in the Middle East: Exploring scope for internal labour market mobility and fair migration*, March 2017, available online at Ref-https://www.ilo.org/beirut/publications/WCMS_552697/lang--en/index.htm

46 *From Regional Pioneer to Global Contender: Our Vision, The Economic Vision 2030 for Bahrain*, available online at https://www.bahrain.bh/wps/portal/!ut/p/a1/LZJfT8lwFMW_ijzscfRu3Z_Ot0kQJYAGRfLFSFdKNzPaMSrot7dATDQRwb7d5nduz72niKIZooptS8lMqRWr9jWN5ncPEHk-8fsETzGkD1FnnHTB60Fogew7ABh390D8GD8nfkTgMj34w453H1j9cAiQkpvx4Om2A9DD5_

47 Kuwait Ministry of Foreign Affairs, *Kuwait Vision 2035 “New Kuwait,”* available online at <https://www.mofa.gov.kw/en/Kuwait-state/Kuwait-vision-2035/>

48 State of Qatar, Government Communications Office, *Qatar National Vision 2030*, available online at <https://www.gco.gov.qa/en/about-qatar/national-vision2030/>

Table 5: Overview of GCC Vision Plans by Country

Country (Year of Publication)	Vision Plans
Saudi Arabia (2016)	Saudi Vision 2030: Diversifying the Saudi economy and reducing its dependence on hydrocarbons by transforming the private sector into a powerful engine driving future economic growth. ⁴⁹
United Arab Emirates (2010)	Vision 2021: Expanding new strategic sectors to channel energies into industries and services where a long-term competitive advantage can be built. ⁵⁰

C. Kafala-tied Fixed-term Employment Regimes as a Risk Factor for Abuse

In their final report, the Human Rights Advisory Board cites the April 2020 report of the UN describing a “de facto caste system based on national origin, which results in structural discrimination against non-citizens, including as the result of immense power imbalances between employers and migrant workers rooted in the kafala system that historically structured labour relations in Qatar.” They also emphasize that FIFA should actively explore ways to use its leverage to engage with the host government about the impact of the kafala system on migrant workers in Qatar.

Across the GCC countries, migrant workers gain entry and permission to work under kafala programs— an employer-sponsorship model of tying workers to a single employer as a condition of entry, right to work, and legal stay in the country. The practice of tying workers to a single employer violates ILO standards under the Employment Policy Convention, 1964 (No. 122), which calls for freedom of choice of employment irrespective of national and social origin (Article 1).

While each of the five GCC states has separate local laws, the overall kafala system functions as a regional paradigm that imbues employers with the authority to restricts workers’ job mobility, freedom to enter and exit the country, and negotiating power. Under the kafala system, the sponsor can be a placement agency, a company, or an individual, who issues an employment contract and bears full responsibility for the employee. The sponsor is in control of the worker’s salary, working conditions, and movement.

As research for this report shows, this imbalanced power dynamic in favour of the employer over the worker⁵¹ continues to undermine the ability of large numbers of workers to exercise labour rights and address labour exploitation, despite initiatives over the last five years to loosen employer control in Qatar, Bahrain, and Saudi Arabia. This structural dependence enables an environment where abuse is perpetrated routinely and with impunity.

49 Kingdom of Saudi Arabia, *Saudi Vision 2030: An ambitious vision for an ambitious nation*, available online at <https://www.vision2030.gov.sa/v2030/overview/>

50 United Arab Emirates, *Vision 2021*, available at <https://www.vision2021.ae/en/uae-vision>

51 ILO, *Employer-Migrant Worker Relationships in the Middle East: Exploring scope for internal labour market mobility and fair migration*, March 2017, available online at: https://www.ilo.org/beirut/publications/WCMS_552697/lang--en/index.htm

Labour Reforms Facilitating Migrant Worker Mobility Between Employers

Beginning in 2015, Qatar, the UAE, Bahrain, and Saudi Arabia have taken some incremental measures that begin to loosen employer control over migrant workers.

- **Qatar’s Law No. 21 of 2015** on the entry, exit, and residency of foreign nationals made it easier for some migrant workers to change jobs and leave the country but did not cancel sponsorship.
- **The UAE has issued a series of labour reforms beginning in 2015**, including removing the requirement of obtaining an employer’s permission to change jobs (No Objection Certificate) or leave the country (Exit Permit), and increasing access to grievance and labour dispute mechanisms.⁵²
- **Bahrain piloted a new “Flexi Permit” visa system in April 2017**, designed to offer undocumented low-wage workers already in the Kingdom the opportunity to regularize their status by securing sponsorship directly through the government.⁵³
- **Saudi Arabia’s Resolution No. 51848/1442 of the Minister of Human Resources and Social Development**, passed on March 14, 2021, eliminated requirements that migrant workers seek the permission of their employer to change jobs, open a bank account, travel out of the country and do other administrative tasks.

In their final report, the Human Rights Advisory Board explains that while some elements of the kafala system have been formally dismantled, the continuing effects of the broader structural discrimination against the predominantly migrant workforce in Qatar, including the ongoing challenge in ensuring local demand for ethical recruitment,

mean that addressing rights abuses in a broad range of sectors, including hospitality and logistics, require significant effort from the Supreme Committee for Delivery and Legacy and FIFA.

Recent Kafala reforms loosened the control that a sponsoring employer can exercise over a worker, addressing a key factor in many cases of worker exploitation and occasionally trafficking in persons cases. However, labour protections applicable to migrant workers still fall well below international conventions and standards as measured against a wide range of rights benchmarks. Trade union participation remains illegal or, where formally lawful such as in Bahrain, practically non-existent. Moreover, the evidence gathered for this report indicates that there continue to be significant gaps in the implementation and enforcement of labour reforms.

Inadequate Labour standards and Enforcement as a Risk Factor for Abuse

Equidem and GLJ-ILRF acknowledge the improvements in formal labour protections in Qatar in recent years, both through the passage of laws and improvements in implementation and enforcement. The effective implementation of major labour reforms in a country with over 2 million migrant workers is a challenging endeavor requiring the coordination of multiple stakeholders in government, business, and others. We hope that the discussion below and findings here advance the Qatar authorities’ own labour protection and remediation efforts by providing new insights into the conditions migrant workers face.

52 Mustafa Qadri, “The UAE’s Kafala System: Harmless or Human Trafficking?” in *Dubai’s Role in Facilitating Corruption and Global Illicit Financial Flows*, ed. Matthew T. Page and Jodi Vittori, Carnegie Endowment for International Peace, July 7, 2020, available online at: <https://carnegieendowment.org/2020/07/07/uae-s-kafala-system-harmless-or-human-trafficking-pub-82188>.

53 The Flexi Permit was established by the Minister of Interior, under Resolution No. 108 of 2017.

Wage Protections

FIFA World Cup Qatar 2022 multinational hotel partners should address risk factors to hospitality workers rooted in inadequate wage protections in Qatar and their regional keys.

Qatari Labour Reforms: Including Migrant Workers Under Minimum Wage Protections

The Qatari government enacted a non-discriminatory minimum wage in 2020 which came into force in March 2021, including migrant workers under the ambit of minimum wage protections.⁵⁴

During our research, workers in the hospitality sector in Qatar described receiving increased wages in line with these legal protections. For instance, a Nepalese woman employed at the Ezdan Palace Hotel—a FIFA World Cup Qatar 2022 partner hotel—explained:

*My salary was 700+300 rial when I came to Qatar. I was promised yearly increase in salary and bonus too. That never happened. The company finally had to increase my salary to 1,000 rial because the government increased its minimum wage. All the talk about yearly increase in salary and bonus before the minimum wage passed was all false.*⁵⁵

Despite the recent establishment of minimum wage protections in Qatar and Bahrain, however, salaries for migrants continue to be low. The hospitality workers we interviewed reported monthly wages ranging from 1,000-4,000 Qatar Rials (\$275-1,100). They described remitting most of their salaries, maintaining no personal savings, and in some cases an inability to afford nutritious food. Moreover, as described in Part 3 of this report, across FIFA World Cup Qatar 2022 hotel partners, wages are set through de facto nationality-based wages scales, leading to large pay discrepancies between workers in the same roles.

Inadequate wage protections in the region

The GCC countries have the lowest prevalence of minimum wage laws globally—with only 73% of GCC countries having any wage protection coverage at all.⁵⁶ In fact, only Qatar and Kuwait have a minimum wage for workers in the private sector that includes migrant workers (Table 6). According to the ILO, sustaining minimum wage levels is particularly relevant to protecting workers and contributing to economic stability, especially during successive waves of the COVID-19 pandemic.⁵⁷

Starting in 2009, GCC countries began implementing Wage Protection Systems (WPS), which require employers to pay salaries electronically via banks, currency exchange centers or financial institutions. However, critics of WPS have noted that a lack of effective enforcement renders WPS an ineffective form of protection. Without adequate wage protection mechanisms, migrant workers remain susceptible to wage-related violations.

54 ILO, Labour reforms: Qatar’s new minimum wage enters into force, March 19, 2021, available online at: https://www.ilo.org/beirut/countries/qatar/WCMS_775981/lang--en/index.htm

55 A Nepalese worker employed at Ezdan Palace Hotel, Doha, Qatar. Interviewed in April 2022.

56 “Minimum wages and wage protection in the Arab States,” ILO, January 8, 2019, available online at: https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_660002.pdf

57 ILO, *ILO Standards and COVID-19 (coronavirus) FAQ: Key provisions of international labour standards relevant to the evolving COVID-19 outbreak*, 29 May 2020, Version 2.1, p. 10, accessed August. 31, 2021, available online at https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/genericdocument/wcms_739937.pdf

Table 6: Private sector minimum wage protections in the GCC by country

Country	Private Sector Minimum Wage Protections, including migrant workers (per month)
Bahrain	No protection
Kuwait	\$247 \$198 (Domestic Workers)
Qatar	\$275
Saudi Arabia	No protection
United Arab Emirates	No protection

Failure to Protect Freedom of Association and Collective Bargaining as a Risk Factor for Abuse

Our investigations demonstrate that the initiatives taken to provide rights protections to migrant workers in Qatar will remain inadequate until workers are free to exercise their human right to peaceful collective representation. Trade union participation and freedom of association rights remain illegal in Qatar, clear violations of the country’s international human rights obligations. As a first step towards remedying this, Equidem and GLJ-ILRF urge FIFA to join our call to the Qatar authorities to support the establishment of a genuinely independent Migrant Worker Centre and call on Qatar to commit to recognizing the rights to freedom of association and the right to join or form a trade union irrespective of nationality, identity or background.

The status of the freedom of association and collective bargaining as fundamental principles and rights at work has been well established among ILO member states.⁵⁸ The freedom of association is recognized as a fundamental right in every international and regional human rights instrument, from the Universal Declaration of Human Rights (UDHR) and related international covenants to regional human rights charters and governing documents of international organisations. The freedom of association is also guaranteed in almost all national constitutions.⁵⁹



58 ILO Declaration on Social Justice for a Fair Globalization, available online at: https://www.ilo.org/global/about-the-ilo/mission-and-objectives/WCMS_099766/lang--en/index.htm#:~:text=The%20International%20Labour%20Organisation%20unanimously,the%20ILO's%20Constitution%20of%201919.

59 ILO: *Giving a voice to rural workers*, ILC, 104th Session, Geneva, 2015, p. 87-88, para 275, available online at: https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_343023.pdf

The freedom of association is a cornerstone right because it creates the conditions for workers and their organisations to intervene in racism, discrimination, and rights violations by advancing, defending, and enforcing all other labour rights. In short, it allows workers through their trade unions to intervene in structural violence. Moreover, in the arena of legislation and policy, trade unions have the capacity to impact labour standards beyond the capacity of any individual worker.

It should be particularly concerning to FIFA World Cup Qatar 2022 partner hotels operating not only in Qatar, but also across the region, that protection of the freedom of association within the region falls far below global labour standards.

Migrant workers’ freedom to associate in the GCC varies from non-existent to severely limited. In Saudi Arabia, Qatar, and Kuwait, migrant workers are unable to join official unions. In the UAE, although Article 33 of the Constitution guarantees freedom of association within the limits of the law, unions are banned, and all public gatherings require government permission. Bahrain is the only country that allows foreign workers to join a union, but many migrants are reluctant to join due to fear of losing their jobs.⁶⁰ The country’s private sector labour law does not prohibit anti-union discrimination so workers can be fired for organizing with impunity. Furthermore, due to unions’ involvement in the 2011 uprisings, the Bahraini government has intensified its efforts to disempower organised labour.⁶¹

Advances in employee participation rights and workplace cooperation in Qatar

While not a substitute for freedom of association, the Qatari government has made some inroads in ensuring employee participation rights aimed at protecting workplace cooperation. The International Labour Organisation (ILO) defines workplace cooperation as a process whereby workers’ representatives participate with management in resolving issues of common concern.⁶² The process provides a channel through which workers and management can develop mutually acceptable work programmes and find solutions for common challenges. Research on workplace cooperation correlates employee information, participation, and negotiation rights with efficiency, productivity, work safety, effective decision-making, improved employment relations, and effective change management.

Qatar’s Law No. (14) of 2004 on the promulgation of Labour Law (Part 13) protects workplace cooperation, including: the formation of joint committees of elected worker representatives and employers (Arts. 124 and 125); study and discussion on all matters related to work in the establishment (Art. 126); the right to conduct collective negotiation and conclude joint agreements (Art. 127); and the right to settle individual and collective disputes in an enterprise through workplace cooperation (Art. 129). The rules and procedures governing collective negotiation, representation, and establishment of joint agreements are yet to be included in a proper framework under the Qatar law and practice.

60 Heather E. Murray, “Hope for Reform Springs Eternal: How the Sponsorship System, Domestic Laws and Traditional Customs Fail to Protect Migrant Domestic Workers in GCC Countries,” *Cornell International Law Journal* 45, no. 2 (Spring 2012): 472, available online at: <http://scholarship.law.cornell.edu/cilj/vol45/iss2/5>

61 ADHRB Admin, “Bahrain’s Forgotten Workers: A Status Report on Labor Discrimination and Forced Dismissals since 2011,” Americans for Democracy & Human Rights in Bahrain, June 14, 2017, available online at: <https://www.adhrb.org/2017/06/12702/>

62 ILO, “Co-operation at the Level of the Undertaking Recommendation,” (No. 94), Article 1, 1952, available online at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R094

Rights Violations Facing Migrant Hotel Workers and Areas for FIFA Intervention

3



A. Nationality- and Gender-based Wage Discrimination

Article 1 of the Convention on the Elimination of All Forms of Racial Discrimination (CERD) expressly prohibits state exclusion based on national origin that nullifies or impairs human rights. Violating these standards, nationality-based wage discrimination in the hospitality sector across the GCC states is widespread, systematic, and openly carried out.

Hotel workers in every country and every one of the 32 hotels investigated by Equidem and GLJ-ILRF—encompassing a total of 9,000-10,000 hospitality sector workers across the region—reported unequal remuneration due to discrimination based on nationality, gender, education, and other axes of exclusion. Without wage protections, these discriminatory practices flourish since wages are determined entirely through employer discretion.

When specific salaries were reported, pay discrepancies between different nationalities were dramatic, including for this Nepalese worker employed at the Westin Hotel and Spa, Doha, Qatar—a FIFA partner hotel groups and the anticipated host of the Brazilian team:

My salary does not reflect my skill level; it reflects my nationality. Filipina women are paid 1,600 (Qatari) rial (\$439) for the same work where we are paid 1,000 rial (\$274).⁶³

Workers also described nationality-based wage discrimination due to a lack of clear standards for allocating raises and assigning promotions. At the Centro Centro Capital, Al Jazeera Street, Doha, Qatar, a FIFA partner hotel groups, workers reported unequal remuneration

due to discrimination based on nationality across the hotel workforce. For instance, a Bangladeshi national told Equidem:

Superiors make hiring decisions based on nationality rather than experience. For the same Bell Attendant job, an Arab worker will be paid more than us. Here, Bangladeshis are paid less, we fear for our jobs, and we have to tolerate unfair decisions.⁶⁴

A Bangladeshi worker employed in the Crowne Plaza, Doha, West Bay, Qatar—a FIFA partner hotel groups—explained:

My manager is from Nepal. She decides who gets raises and promotions. In my department, the workers from Nepal have gotten promotions with raises. I have worked in my current position for three years without receiving a raise or promotion.⁶⁵

A worker employed in the Front Office of the Retaj Al Rayyan Hotel, Doha, Qatar—a FIFA partner hotel groups—explained:

Your job is tied to your nationality. If you are from Bangladesh or Nepal, then you can't expect a senior position, even if you have the qualifications. In this hotel, only Egyptians are given promotions.⁶⁶

At the Holiday Villa Hotel and Residence in Doha, Qatar—another FIFA World Cup Qatar 2022 partner hotel—workers described significant wage and hiring discrimination against African workers. A Ghanaian worker described his experience at this hotel:

63 A Nepalese national employed at Westin Hotel, Doha, Qatar. Interviewed in April 2022.

64 A Bangladeshi national employed at Centro Capital, Doha, Qatar. Interviewed in April 2022.

65 A Bangladeshi worker employed at the Crowne Plaza, Doha West Bay Hotel. Interviewed in June 2022.

66 Worker employed in the Front Office of the Retaj Al Rayyan Hotel, Doha, Qatar. Interviewed in June 2022.

Here, the salary is based on nationality rather than experience. Regardless of our experience, African people are only hired in security, housekeeping, and in the kitchen.⁶⁷

Another worker from the same hotel explained:

People hired from Africa are paid QR 200 less than other staff members with the same jobs.⁶⁸

A Ghanaian worker employed at Crowne Plaza, The Business Park, Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—described his experience:

Here, the salary is not about what you bring to the table. I will never get the same salary as an Arab colleague. There is a lot of discrimination against people from Africa. We are only hired in some types of jobs – security, housekeeping, the kitchen.

Wage discrimination at the time of hiring is maintained among senior workers due to lack of salary reviews and clear and transparent standards for promotion. A Kenyan worker employed at the Westin Hotel—a FIFA partner hotel groups and the host hotel for the Brazilian team—reported that his salary not been reviewed or significantly increased in three years:

We receive less pay and too much work. I have worked here for almost three years and my salary has never been reviewed. I earn the same amount as I did when I arrived, and my work takes more than 8 hours a day. I am not paid overtime.⁶⁹

Nationality and gender-based wage discrimination is common in FIFA multinational partner hotels across the region. A Bangladeshi Holiday Inn employee in Saudi Arabia described nationality-based wage discrimination:

There is no equal pay for equal work. For example, if my same job is done by any Saudi or other Arabic people, their salary might be 2,500-4,000 (Saudi) rial (\$665-1,065) higher. There is also some inter-country nepotism on promotion and salary increment.⁷⁰

Nationality-based discrimination is not the only cause of unequal remuneration. A female Housekeeping Supervisor described her experience with gender-based discrimination at JW Marriott Hotel, Kuwait City.

There is discrimination here on the basis of gender. For the same work, my male co-workers are paid 130 (Kuwaiti) dinar (\$423), but I am paid just 120 (Kuwaiti) dinar (\$390).⁷¹

The wage inequality that female workers in Kuwait experience is legal. Labour laws in Kuwait have no applicable provision mandating that women must receive equal remuneration for work of equal value.⁷²

Nationality and gender-based wage discrimination flourishes in a context where the state does not define and enforce minimum wage and other labour standards. In fact, the lack of wage and other labour rights protections in the GCC functions to relieve the State of the role of protecting migrant workers’ rights. This leaves migrant workers subject to unilaterally determined conditions set by employers with few legal avenues for relief.

67 A Ghanaian worker employed at the Holiday Villa Hotel and Residence in Doha, Qatar. Interviewed in June 2022.

68 An Indian worker employed at the Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

69 A Kenyan worker employed at the Westin Hotel, Doha, Qatar. Interviewed in July 2022.

70 A Bangladeshi worker employed at the Holiday Inn Riyadh-Olaya, Riyadh. Interviewed in October 2020.

71 A worker employed in the JW Marriott Hotel, Kuwait City. Interviewed in October 2020.

72 Women Business and the Law, “Kuwait,” The World Bank, 2021, available online at: <https://wbl.worldbank.org/en/data/exploreeconomies/Kuwait/2021>

***Protecting worker rights—skill upgradation opportunities, employee advancement, and non-discrimination**

In this context of widespread discrimination, our research uncovered the following notable practice for advancing equal opportunity.

At the Crown Plaza, Doha, The Business Park—a FIFA World Cup Qatar 2022 partner hotel—workers described structured opportunities for advancement, linking promotion to skill upgradation rather than nationality-based preference. A migrant worker described their experience:

I started working in this hotel in housekeeping. I was a Room Attendant and then after training through a program in the hotel for 150 hours, I joined as a Telephone Attendant. Now I handle internal and external calls. Our team

in the front office is very diverse—workers come from India, the Philippines, Bangladesh, Myanmar, Tunisia, Algeria, Lebanon, and Qatar. We are women and men, and we are treated equally, paid equally, and we work the same hours. It is a very nice place to work.⁷³

As described above, skills-based pathways for advancement facilitate diversity among higher skilled employees, and ultimately increase job satisfaction and worker productivity. The fact that these practices exist, but that the workers we spoke to still complained about workplace discrimination, demonstrates the need for further efforts by FIFA, its hospitality partners, and the Qatar authorities to extend good practices for expanding equal opportunities across Qatar and the GCC region.

B. Wage-Related Rights Abuses

Denial of wages and employment benefits, whether written in employment agreements or not, has a devastating impact on workers across the global economy. These well documented practices of denying workers owed wages have been increasingly recognized and referred to as “wage theft” by journalists and labour rights advocates.⁷⁴ Across the hospitality sector in the Gulf, our research found rampant wage theft practices—including non-payment and underpayment of wages and severance.

The ILO Protection of Wages Convention, 1949 (No. 95) protects all persons to whom wages are paid or payable (Article 2). Convention 95 calls for all wages to be paid directly to the worker,

unless otherwise established under national laws, collective agreements, or agreements between the worker and employer (Article 5). Wages are to be paid regularly, and a final settlement of all wages due is required upon terminating an employment contract (Article 12). Under the ILO Termination of Employment Convention, 1982 (No. 158), workers whose employment is terminated should be entitled to a severance allowance or other separation benefits, unemployment insurance benefits, or other forms of assistance to compensate for the loss of earnings incurred because of termination.

None of the GCC countries covered in this report have ratified Convention 95 or 158. Instead, rather than issuing guidelines to protect wages for all

73 A worker employed at the Crown Plaza, Doha—The Business Park. Interview conducted in Qatar, July 2022.

74 Migrant Forum in Asia, *Policy Brief No. 1 Justice for Migrant Workers: Creating an Effective Solution to Address Wage Theft*, accessed August 31, 2021, available online at: <https://mfasia.org/policy-brief-no-1-justice-for-migrant-workers-creating-an-effective-solution-to-address-wage-theft/>; Asia Floor Wage Alliance, *Money Heist: Covid-19 Wage Theft in Global Garment Supply Chains*, accessed August 31, 2021, available online at: <https://asia.floorwage.org/covid/money-heist-covid-19-wage-theft-in-global-garment-supply-chains/>; Guardian, “Top fashion brands face legal challenge over garment workers’ rights in Asia,” accessed August 31, 2021, available online at: <https://www.theguardian.com/global-development/2021/jul/09/top-fashion-brands-face-legal-challenge-over-garment-workers-rights-in-asia>.

workers, in the wake of the COVID-19 pandemic, GCC countries issued policies relaxing enforcement of employment contracts.⁷⁵ Such measures included allowing employers to break contracts, including by authorizing leave with and without pay, and temporary and permanent reduction in wages (Bahrain and UAE),⁷⁶ authorizing employers to reduce working hours (Qatar), and considering COVID-19 force majeure grounds to terminate all employment contracts (Saudi Arabia).⁷⁷ Inadequate wage protection in the GCC is a regional risk factor for labour rights abuses, requiring FIFA and FIFA multinational hotel partners to exercise heightened due diligence to ensure that all workers’ wages are protected in line with international standards established by Conventions 95 and 158.

At the intersection of government policies relaxing already limited wage protections in the GCC countries and employer practices of displacing economic shocks onto their workforce, the hospitality staff we interviewed reported widespread wage theft. Wage theft takes a range of forms, including non-payment and underpayment of owed wages, reduction in working hours and wages that is unilaterally determined by shifting employer needs without worker consent, and non-payment and underpayment of severance. Employer practices of securing documentation falsely claiming that wages and severance pay had been paid in full create significant barriers to relief for migrant workers who seek to pursue stolen wages.

Table 7: Employment practices and wage theft outcomes in the hospitality industry

Employment practices	Wage theft outcomes
Unpaid mandatory overtime	Underpayment of wages
Unilateral termination of all wages while requiring workers to complete assigned work	Non-payment of wages
Unilateral suspension of all work and wages, including by putting workers on unpaid leave	Non-payment of wages
Unilateral reduction of working hours and associated wages	Underpayment of wages
Terminating workers without providing any contractually owed severance payments	Non-payment of severance
Terminating workers while providing severance payments below the contractually agreed upon rate	Underpayment of severance

75 ILO “COVID-19: Labour Market Impact and Policy Response in the Arab States, May 2020, available online at: https://www.ilo.org/wcmsp5/groups/public/--arabstates/--ro-beirut/documents/briefingnote/wcms_744832.pdf

76 DW “Coronavirus deepens risks for migrant workers in the Gulf” May 1, 2020, available online at: <https://www.dw.com/en/coronavirus-deepens-risks-for-migrant-workers-in-the-gulf/a-53297391>; Arab Reform Initiatives, “COVID-19 and the Intensification of the GCC Workforce Nationalization Policies”, November 10, 2020, available online at: <https://www.arab-reform.net/publication/covid-19-and-the-intensification-of-the-gcc-workforce-nationalization-policies/>

77 CMS Law-Now, “Kingdom of Saudi Arabia: The recent Supreme Court Decision on contracts impacted by COVID-19,” accessed August 31, 2021, <https://www.cms-lawnow.com/ealerts/2021/03/kingdom-of-saudi-arabia-the-recent-supreme-court-decision-on-contracts-impacted-by-covid19>; Abuhimed Alsheikh Alhagbani and Clifford Chance, *Coronavirus: Key contractual Considerations in Saudi Arabia*, <https://www.ashlawksa.com/en/publications/coronavirus-key-contractual-considerations-in-saudi-arabia.html>

Non-payment or Underpayment of Wages

Hospitality workers employed by FIFA World Cup Qatar 2022 partner hotels, and other hotels affiliated with these multinational partners across the region, reported periods during which they received no wages or wages reduced from what was agreed upon at the time of hire. In some cases, workers were not given the wages they were promised or owed based upon overtime work performed. In others, workers were unpaid and not working, or partially employed and receiving partial wages. These practices violate international labour standards under the ILO Protection of Wages Convention, 1949 (No. 95), which requires the regular payment of wages, including upon termination.

As employment practices, non-payment and underpayment of wages were deployed by hotels in the region during and after successive phases of the ongoing pandemic. The potential for employers to perpetrate these forms of wage theft with no accountability is a significant risk factor that must be addressed by FIFA and FIFA multinational hotel partners operating in the region.



Unpaid overtime

At the Holiday Villa Hotel and Residence, Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel—workers reported being required to work extended hours without paid overtime. One worker explained:

For nine months, we were made to work for more than 12 hours a day, without a day off. In order to keep our hours hidden, we were prevented from clocking in and clocking out. I was on the verge of going insane.⁷⁸

A Filipino worker at the JW Marriot Marquis City Center, West Bay—a FIFA World Cup Qatar 2022 partner hotel—reported that no one at the hotel is paid overtime.

It is common to come to work early and to leave for home late, even for managers. If we work ten hours overtime, we will maybe get paid for four of those overtime hours. They should pay overtime. No one gets paid overtime, not even the managers.⁷⁹

Workers at the Crowne Plaza, West Bay, Doha—a FIFA World Cup 2022 partner hotel—also reported that they are not paid overtime. A worker in the Housekeeping Department explained:

The overtime rate is 1.25% of our basic salary, but we never get overtime payments.⁸⁰

Workers across departments at the Souq Waqif Boutique Hotel, Doha, Qatar—a FIFA World Cup 2022 partner hotel—described being required to work overtime without receiving overtime payments. Workers in the food and beverage department reported that unpaid overtime is a daily occurrence on the morning shift, which requires them to report from 5 am to 3 pm. A worker explained:

78 A worker employed at Holiday Villa Hotel and Residence, Doha, Qatar. Interview conducted in Qatar, June 2022.

79 A Filipino worker at the JW Marriot Marquis City Center, West Bay. Interviewed in June 2022.

80 A worker employed at Crowne Plaza-The Business Park, Doha, Qatar,. Interviewed in April 2022.

I do the opening shift six days a week. I work 10 hours each day. They do not pay for these overtime hours. This is a common practice in this hotel and across the industry.⁸¹

In the Housekeeping Department at this hotel, workers also described regularly working overtime hours without compensation. A worker explained:

We work six days a week, for 9-12 hours. We work three hours of overtime at least three times a week. They never pay us overtime.⁸²

An Indian worker in the hotel described a similar experience:

If the hotel is busy or our work runs over, working additional hours is not considered overtime.⁸³

At the Crowne Plaza, West Bay, Doha, Qatar, a Bangladeshi worker employed described hard work, extended hours, and no compensation for overtime:

The work here is very hard. We have to work extra hours without extra pay.⁸⁴

A worker employed in the Front Office at the Retaj Al Rayyan Hotel, Doha, Qatar—another FIFA World Cup Qatar 2022 partner—described a practice of requiring contract workers to routinely work more hours than they are paid for:

Valet workers, employed by the hotel through a contractor, routinely work 12-hour days but are only paid for 9-hour shifts.⁸⁵

Workers employed at Souk Al Wakra—a FIFA World Cup Qatar 2022 and the host hotel for the England team—within the last five years reported unpaid

overtime. One worker described the practice of not paying overtime at Souq Al Wakra as a low-road practices in a sector where other hotels do pay overtime:

Al Wakra was not paying overtime. Other hotels were paying.⁸⁶

A Food and Beverage worker also described being made to work extended hours without receiving overtime:

They [Al Wakra] don't hire enough staff, so we need to extend our time working. Overtime is not paid there [at Al Wakra]. If we extend our working time, they should pay for it.⁸⁷

***Protecting workers' rights to paid overtime—good practices from FIFA World Cup Qatar 2022 hotel partners**

In addition to the long-standing practice of unpaid overtime described above, workers also described new practices of digitally tracking hours and ensuring wage payments that had been recently instituted at Souq Al Wakra. A worker employed through a contractor at this hotel described working eight-hour shifts, tracked by biometric login, and receiving overtime pay:

I work the afternoon shift. I start my duty at 3 pm and punch in with a biometric finger scan. I am individually staffed at a post by my supervisor. I finish at 11 pm and report to my team leader. We are paid a 1.5% overtime rate.⁸⁸

81 A worker employed in Souq Waqif Boutique Hotel, Doha, Qatar. Interview conducted in Qatar, June 2022.

82 A worker employed in the Housekeeping Department at Souq Waqif Boutique Hotel, Doha, Qatar. Interview conducted in Qatar, June 2022.

83 An Indian worker employed at Souq Waqif Boutique Hotel, Doha, Qatar. Interviewed in June, 2022.

84 A worker employed at the Crowne Plaza, West Bay, Doha, Qatar. Interview conducted in Qatar, June 2022.

85 A worker employed in the Front Office at the Retaj Al Rayyan Hotel, Doha, Qatar. Interview conducted in Qatar, May 2022.

86 An Indian worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

87 A worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

88 A worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

A Bangladeshi worker employed at the Holiday Villa Hotel and Residence—a FIFA World Cup Qatar 2022 partner hotel—reported receiving regular overtime payments:

***My basic duty is eight hours. If I work more than 8 hours, I am paid overtime.*⁸⁹**

A Nepalese worker employed at the Marsa Malaz Kempinski, The Pearl—Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—explained:

“We work overtime, but when we work overtime we get paid for those hours.”⁹⁰

Tracking and remunerating overtime hours is critical to addressing wage theft. These measures should be recognized as a good practice, expanded to encompass hospitality workers employed through contractors, and be mandated by FIFA and its multinational hotel partners across the region.

Wages lower than promised

A worker employed at the Westin Hotel, Doha, Qatar—a FIFA partner hotel groups and the host hotel for the Brazilian team—described receiving lower wages than she was promised at the time of hiring:

***I was hired in the food and beverage department. They told me I would get a six-month trial period and at the end of the period, my salary would be raised from 1,300 (Qatari) rial (\$357) to 1,600 rial (\$439). Instead of working in food and beverages, they staff me all over the hotel, including in housekeeping. It has been six months, but my salary has not been increased as promised.*⁹¹**

A Kenyan worker employed through a contractor at the JW Marriot Marquis City Center, West Bay—a FIFA partner hotel groups—described being paid wages below what he was promised at the time of recruitment by the contracting agency:

***The agent told me I would be paid 3,000 (Qatari) rials (\$823), but I am paid 2,000 (Qatari) rials (\$549). I am afraid of asking for clarification. There is a written contract, but I didn't get a copy of my contract from the employer after signing. They promised to give it to me but they haven't.*⁹²**

Another worker employed through a contractor at the Pullman Hotel, Doha West Bay—a FIFA partner hotel groups—also described being paid significantly less than she was promised:

***My salary is paid on time, but not what we agreed on. We agreed on 1,500 (Qatari) rials (\$411) but I get paid 1,000 (Qatari) rials (\$274).*⁹³**

Withholding owed wages

During the COVID 19 pandemic, workers at the Westin Hotel—a FIFA partner hotel groups and the host hotel for the Brazilian team—reported pay deductions and delays:

***There were delays and deductions in pay. We all suffered pay cuts.*⁹⁴**

An Indian worker employed at the InterContinental, Dubai in the UAE described being required to leave for India the day after he was fired but before receiving two months owed wages.

89 A Bangladeshi national employed at Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022

90 A Nepalese worker employed at the Marsa Malaz Kempinski, The Pearl, Doha Qatar. Interviewed in June 2022

91 A worker employed at the Westin Hotel, Doha, Qatar. Interviewed in June 2022

92 A Kenyan worker employed at the JW Marriott Marquis City Center, West Bay, Doha. Interviewed in July 2022.

93 A worker at the Pullman Hotel, Doha, West Bay. Interviewed in July 2022.

94 A Kenyan worker employed at the Westin Hotel, Doha, Qatar. Interviewed in July 2022.

On March 17, 2020 the hotel manager made me sign a paper and after signing gave me a flight ticket to India for March 18. He told me, “You have a flight tomorrow morning. Pack all your things.” I was startled. The hotel owed me a salary for two months. I demanded my salary and other payments owed, but the manager said the hotel could not pay me. I left for India the next day.⁹⁵

Reduced hours for reduced pay

A Nepalese worker employed at the Hotel InterContinental, Manama in Bahrain was placed on unpaid leave for three months.⁹⁶ Other workers at the same hotel⁹⁷ described working reduced hours for reduced pay, with wage reductions ranging from 25%-70%.

Workers who remained employed at a Marriott hotel in the UAE reported a 25% percent reduction in work and wages. A Nepalese worker explained:

Everyone [who was not fired] got work. There was a schedule so that we got 6 days off each month and 24 days of work. We were paid for three weeks a month or 75% of our salary.⁹⁸

In this account, unilateral reduction in employment corresponded with an equal percentage reduction in working hours. This 25% reduction in wages still displaced company financial losses to workers, but to a lesser degree than experienced by workers in other hotels.

A worker employed as an Electrician in the Hotel InterContinental, Manama, Bahrain described being required to work reduced hours with a 70% reduction in salary to keep his job.

The hotel was closed for two and half months. During this time, I came to the hotel once a week to check the gas and electric lines and I was paid just 30% of my salary. I was told that if I did not agree to this payment, I could leave the job. I could only manage my food and accommodation with that money. I couldn't send money to my family. It was a very tough time.⁹⁹

While the worker described above decided to continue working at the hotel in order to retain his job, other workers refused to work without pay and returned home instead.

Work with no pay

An Indian worker employed at a Fairmont hotel in the UAE explained his decision to return home:

After the lockdown, the hotel asked us to work without pay until December in return for accommodation, or we could apply for extended unpaid leave. I could not stay without pay. I have family commitments. The company did not give us notice. Workers who resigned got their service entitlement.¹⁰⁰

In this hotel, the policy of explicitly asking workers to stay and fulfill their duties without pay for a period of nine months suggests that long-term and large-scale wage theft practices were premeditated. In this case, workers who resigned were given their service entitlements as mandated at the time of termination.

Some workers reported that upon deciding to leave their place of employment, they not only did not receive severance, but also received only partial

95 An Indian worker employed at the InterContinental, Dubai. Interviewed in July 2020.

96 A Nepalese worker employed at the Hotel InterContinental, Manama in Bahrain. Interviewed in September 2020.

97 A Bangladeshi worker employed at the InterContinental, Manama, in Bahrain. Interviewed in September 2020.

98 A Nepalese worker employed at a Marriott Hotel in the UAE. Interviewed in December 2020.

99 A worker employed as an Electrician at the Hotel InterContinental, Manama, Bahrain. Interviewed in October 2020.

100 An Indian worker employed at a Fairmont Hotel in the UAE. Interviewed in October 2020.

payment of wages due, with promises to pay the balance later. A worker employed at a hotel in Bahrain explained:

For those workers who want to go home or change their employer, the company is giving them a cheque of 75% of the amount they are owed. The company says they do not have money right now but said they will pay after two months.¹⁰¹

Non-payment or Underpayment of Severance

Wage theft can also take the form of non-payment or underpayment of owed benefits. An Indian worker employed at Souq Al Wakra Hotel—the host hotel for the England team—reported suddenly losing his job with the outbreak of COVID 19, and receiving no severance pay:

During the pandemic they fired many staff. They told us that within 1 month we are going to fire you. They paid our tickets to our home countries and gave workers they fired 400 (Qatari) rials (\$100) to pay for food until their flight. They did not provide any other payments.¹⁰²

In some cases, despite the financial hardships facing the industry, hotels held up their contractual obligations to pay wages owed to terminated workers, and even paid for return fares home. A Nepalese worker employed at a Marriott hotel in the UAE described good practices by his employer:

8-10 Nepalese workers were fired. They got their settlements, and the hotel also paid for their ticket to return home.¹⁰³

Such high-road practices should be used as a benchmark across the industry.

Discrimination in Selecting Employees to Work and Receive Pay

Workers in FIFA World Cup Qatar 2022 partner hotels reported unstable employment, including not having fixed hours or wages. A worker employed by a contractor and working as a Laundry Attendant at Souq Al Wakra Hotel—the host hotel for the England team—described working without a fixed salary or schedule and receiving only 60% of the wages paid by the hotel to the agency.

They [the agency] pay us per hour. The hotel pays 15 (Qatari) rial (\$4) to the agency, and they pay us 9 (Qatari) rial (\$2.5) per hour. There is no fixed salary. When it is busy, we might work a 12-hour shift, and when it is not busy, we are off with no work.¹⁰⁴

In this environment of precarious work, selecting workers for employment is another site of discrimination. When employers withheld wages, not all workers were impacted equally. With these shifts in working hours and associated pay, hotel management were tasked with selecting workers for employment. Pre-existing structures of nationality-based pay discrimination were reflected in who experienced wage theft and termination. An Indian worker at a Rotana hotel in the UAE described how non-nationals were either terminated or had their wages reduced:

Many employees were terminated and their salary was decreased by 50%, but wage reductions only affected non-nationals, including Indian, Pakistani, Filipino, Syrian and Ethiopian workers. Low-wage workers including Housekeeping Staff and Kitchen Stewards earning 1,500 dirham (\$408) really struggled. Most of them were the main breadwinners in their families.¹⁰⁵

101 A worker employed at a hotel in Bahrain. Interviewed in October 2020.

102 An Indian worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

103 A Nepalese worker employed at a Marriott Hotel in the UAE. Interviewed in September 2020.

104 A worker employed by a contractor as a Laundry Attendant at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

105 An Indian worker employed at a Rotana Hotel in the UAE. Interviewed in January 2021.

This trend was observed by respondents in almost every country. A Bangladeshi worker at the City Tower Hotel in Kuwait reported that westerners and nationals were given priority for work and pay.¹⁰⁶ Similarly, a Bangladeshi worker at the Holiday Inn, Riyadh-Olaya hotel in Saudi Arabia had his salary reduced and withheld while his Western and Saudi co-workers were paid in full and on time.¹⁰⁷ At the JW Marriott Marquis Hotel in Dubai, migrant workers were singled out for a 15% salary reduction.¹⁰⁸

While nationals and Westerners overwhelmingly receive better treatment, nationality-based discrimination can also favor migrant workers from more established migration corridors where workers have attained managerial positions. A Nepalese worker at the Courtyard by Marriott Hotel, Kuwait City noted that Indian workers received priority due to the prevalence of Indians in management.¹⁰⁹ As a result of this policy and the lack of any protections or redress, a Nepalese worker at the JW Marriott Hotel, Kuwait said she went unpaid for seven months.

The hotel has a no work, no pay policy. They are choosing workers they like for duty, while we have not got any work since March.¹¹⁰

“No work, no pay policies” which allow employers to selectively reduce their costs by withholding salaries when there is a drop in demand for labour enables workplace discrimination. Low-wage non-Western migrants are disproportionately affected by this practice due to their inability to seek redress.

Some migrant workers, however, also described systematic reorganisation to ensure that all employees had opportunities to work and earn. A Bangladeshi worker employed at the Holiday

Inn, Riyadh - Olaya in Saudi Arabia described hotel policies that distributed opportunities for paid work across the workforce:

During the pandemic, some of the services at the hotel were still open. They reduced our hours to 5 hours instead of 8 hours per day. Our salary was paid at 60%. Our duty was flexible and re-organised to give everyone a chance to work. We stayed at a dorm hired by the hotel.¹¹¹

A Bangladeshi worker employed at the Al Faisal Hotel in Saudi Arabia described similar attention to rearranging departments so that even non-essential workers were at least partially employed.¹¹² While unilateral reduction of wages on the basis of employer needs still constitute wage theft, such practice of extending employment security across the workforce, regardless of migration status, take steps toward addressing deeply entrenched patterns of discrimination within the hospitality and others sectors in the GCC.

Falsified Documents

Workers facing sudden termination commonly reported being made to sign documents confirming they had received salary and benefits, when in reality they were left suddenly destitute. Workers employed in two Marriott hotels under the same management—the JW Marriott Hotel and Courtyard by Marriott, both in Kuwait City—did not receive wages but were required to sign papers indicating that they had been paid. A Nepalese worker employed at the Courtyard by Marriott, Kuwait City described being made to sign slips confirming receipt of payment every month from March - October 2020:

106 A Bangladeshi worker employed at the City Tower Hotel, Kuwait City. Interviewed in November 2020.

107 A Bangladeshi worker employed at the Holiday Inn Riyadh-Olaya, Riyadh. Interviewed in October 2020.

108 An Indian worker employed at the JW Marriott Marquis Hotel, Dubai, UAE. Interviewed in January 2021.

109 A Nepalese worker employed at the Courtyard by Marriott Hotel, Kuwait City. Interviewed in October 2020.

110 A Nepalese worker employed at JW Marriott Hotel, Kuwait. Interviewed in October 2020.

111 A Bangladeshi worker employed at the Holiday Inn, Riyadh-Olaya, Saudi Arabia. Interviewed in October 2020.

112 A Bangladeshi worker, employed at Al Faisal Hotel, Saudi Arabia. Interviewed in October 2020.

We have not been paid since March 14, but the hotel is making us sign our payment slip every month, even though they have not paid us.¹¹³

A Nepalese worker at the same hotel also described being required to sign false documents:

The last payment I got was in March. I got paid for 11 days that month. From March to October the company did not pay us even a single penny. Despite this, each month, the company makes us sign a paper saying we have collected our salary. Last week, I was asked to help at the restaurant. I went there for 4 days. I was not paid for those days.¹¹⁴

A Bangladeshi worker employed at a hotel in Riyadh, Saudi Arabia described being made to sign false documents upon termination:

The company fired me. They made me sign a document saying that all my salary and other benefits were paid, but in reality, I did not get a dime.¹¹⁵

In such cases, where workers are made to sign false statements that salary and other benefits have been paid in full, they have few, if any, pathways to legal relief.

Recruitment Fees, Remittances, Dependents, and Debt

Wage theft practices perpetrated against migrant workers employed by FIFA World Cup Qatar 2022 hotel partners in Qatar and across their regional hotels impacts not only migrant workers, but also their families. Almost all the migrant workers employed in the hospitality sector that we interviewed for this study regularly sent

remittances home to their families. These amounts varied, with workers sending between 30 and 95 percent of their salary.

Risks associated with wage theft for migrant workers and their families are exacerbated by the significant debt many workers service from their earnings. Often, a portion of migrants’ debt was accrued through paying recruitment fees even though the fee should be paid by their employer.

A Kenyan worker employed at the Westin Hotel—a FIFA partner hotel groups and the host hotel for the Brazilian team—reported that he was charged a recruitment fee by the contractor who hires him, and only found out later that these expenses should be paid by the employer:

In 2020, I was interviewed by two people, and then asked to pay a recruitment fee that amounts to \$1,400.¹¹⁶

A worker employed through a contractor at the JW Marriot Marquis City Center, West Bay — a FIFA World Cup 2022 partner hotel— also described being charged recruitment fees by the contracting agency:

I paid \$1,000 in recruitment fees. There was no breakdown for what these fees covered. I did not know that employers are responsible for paying recruitment fees.¹¹⁷

At the Crowne Plaza, the Business Park, Doha, Qatar— a FIFA World Cup 2022 partner hotel— workers described paying recruitment fees, and not knowing that employers are responsible for these costs. A Bangladeshi worker hired at this hotel through a contractor explained:

113 A Nepalese worker employed at the Courtyard by Marriott, Kuwait City. Interviewed in October 2020.

114 A Nepalese worker employed at the Courtyard by Marriott, Kuwait City. Interviewed in October 2020.

115 A Bangladeshi worker employed at the Holiday Inn Riyadh-Olaya, Saudi Arabia. Interviewed in July 2020.

116 A Kenyan worker employed at the Westin Hotel, Doha, Qatar. Interviewed in July 2022.

117 A worker employed at the JW Marriott Marquis City Center, West Bay, Doha. Interview in July 2022.

I paid 3 lakh (Bangladeshi) taka (\$3,207) to cover the costs of recruitment. I did not know that the employer is responsible for this cost.¹¹⁸

A Bangladeshi worker employed through a contractor at the JW Marriott Marquis City Center, West Bay, Doha—another FIFA World Cup Partner Hotel—also reported paying 3 lakh (Bangladeshi) taka (\$3,207) in recruitment fees.¹¹⁹

A Security Guard who works at Ezdan Palace Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel—employed through a contractor, also reported paying significant recruitment fees and not being informed that employers should cover costs of recruitment:

I paid 1,644 (Qatari) rial (\$451) in fees to a subagent to migrate. I took a bank loan to cover the fees.¹²⁰

A worker employed through a contractor at Souq Al Wakra Hotel—the host hotel for the England team—also reported paying recruitment fees and not being informed that employers should cover costs of recruitment:

I paid 50,000-60,000 (Indian) rupees (\$625-750) in recruitment fees. I didn't know the employer should pay the recruitment fees.¹²¹

A Bangladeshi contract worker employed in the InterContinental Hotel, West Bay, Doha, Qatar—a FIFA World Cup Qatar hotel partner—described paying 120,000 (Bangladeshi) taka (\$1,291) in recruitment fees prior to migration.

A worker employed through a contractor at the Westin Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel and the host hotel for the Brazilian team—paid \$1,300 in recruitment fees:

I didn't know the employer was responsible for paying these fees. My employer did not disclose this information.¹²²

A worker employed through a contractor at the Pullman Hotel, Doha West Bay—a FIFA partner hotel groups—also paid recruitment fees:

I paid \$1,000 in recruitment fees. They did not give me a breakdown of what these fees covered. I did not know the employer is supposed to pay, I paid myself. I needed the job so I borrowed money from family and friends.¹²³

A common means of obtaining the funds necessary for labour migration to the GCC is mortgaging land, as described by a Bangladeshi worker employed at the Hotel InterContinental, Manama in Bahrain:

My cousin managed my work visa application. For a “Free Visa” he asked me to pay 200,000 (Bangladeshi) taka (\$2,136) and manage the air ticket. I mortgaged my land and paid the amount.¹²⁴

A Nepalese woman employed at a Marriott hotel in Kuwait also described mortgaging her home, in this case to pay school fees for her son:

We had to mortgage our house and take out a loan of 2,800,000 (Nepalese) rupees (\$22,000) to send my son to study. We have paid 1,200,000 (\$9,428) but the rest is still remaining.¹²⁵

118 A Bangladeshi worker employed at the Crown Plaza—The Business Park, Doha, Qatar. Interviewed in June 2022.

119 A Bangladeshi worker employed at the JW Marriot Marquis City Center, West Bay, Doha. Interviewed in June 2022.

120 A Security Guard employed at Ezdan Palace Hotel, Doha, Qatar. Interviewed in April 2022.

121 A worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

122 A worker employed at Westin Hotel, Doha, Qatar. Interviewed in June 2022.

123 A worker employed through a contractor at the Pullman Hotel, Doha, West Bay. Interview conducted in Qatar, July 2022.

124 A Bangladeshi worker employed at the Hotel InterContinental, Manama, Bahrain. Interviewed in September 2020.

125 A Nepalese worker employed at a Marriott Hotel in Kuwait. Interviewed in October 2020.

Debts associated with migration and meeting family needs make workers more susceptible to abuse due to their need to maintain an income and service their debt’s interest. The costs of defaulting on these loans are steep and can even lead to workers and their families losing their homes.

***Protecting workers’ rights in recruitment —good practices from FIFA World Cup Qatar 2022 hotel partners**

We also spoke to some workers who reported laudable recruitment practices. For example, one FIFA World Cup Qatar 2022 hotel partner intervened on behalf of workers who were charged illegitimate fees by agencies during the recruitment process. A Nepalese worker employed at the Marsa Malaz Kempinski, The Pearl—Doha, Qatar, a FIFA World Cup Qatar 2022 hotel partner, explained:

I was directly recruited by the hotel, but due to the law in Nepal, my recruitment had to be processed through an agency. The agency was trying to make money by charging additional fees, but I had a conversation with HR [Human Resources Department] at this hotel and they contacted the agency to make sure I didn’t have to pay anything.¹²⁶

In this incident, the Marsa Malaz Kempinski, The Pearl—Doha, Qatar, modeled a range of good practices: their Human Resources Department was accessible to new recruits, informed about migrant workers’ rights in the recruitment process, and proactive about intervening to address agency misconduct.

One Assistant Housekeeping Manager at the Souq Waqif Boutique Hotel, a FIFA World Cup Qatar 2022 hotel partner, also reported good practices from the hotel during recruitment. In this case, the hotel paid all recruitment costs directly to the agency:

An agency contacted me to recruit me for this job, but I did not pay the agency. My employer paid them directly.¹²⁷

Such active engagement by hotels in ensuring workers are not charged recruitment fees is critical to protecting hospitality workers from exploitation during recruitment. The measures taken by these FIFA World Cup Qatar 2022 partners should be recognized as good practices, held up as industry benchmarks, expanded to encompass hospitality workers employed through contractors, and mandated by FIFA and its multinational hotel partners across the region.

Wage theft as an indicator of forced labour

The ILO Forced Labour Convention (No. 29), the ILO Abolition of Forced Labour Convention (No. 105), and the Protocol to the Forced Labour Convention, 1930 (2014) obligate ratifying States to suppress the use of forced or compulsory labour in all forms within the shortest possible period (No. 29, A1; No. 105, A2). The Forced Labour Convention defines forced labour as “all work or service extracted from any person under the menace of penalty and for which the said person has not offered himself voluntarily” (No. 29, A2(1)). This definition has two components: involuntary entry and menace of penalty. The Convention applies to forced or compulsory labour for the benefit of individuals, companies or associations.

When workers are subjected to different conditions of work from those to which they agreed, the standard of involuntary entry is satisfied. This includes cases of wage theft, where workers consent to particular terms of employment and complete agreed-upon work, yet do not receive the job description or wages promised to them. Wage theft thus shifts the terms of employment from those that were freely accepted, establishing involuntary entry.

126 A Nepalese worker employed at the Marsa Malaz Kempinski, The Pearl—Doha, Qatar. Interviewed in June 21, 2022.

127 A worker employed as Assistant Housekeeping Manager at the Souq Waqif Boutique Hotel. Interviewed in June 28, 2022

Menace of penalty may be linked to specific employer actions or broad structural conditions of work. Looming threats of retaliation or termination establish menace of penalty. Penalties including termination are particularly harmful where migration policies require workers to leave the country if they do not have secure employment. After migrant workers are forced to leave the destination state, re-entry entails extremely high costs, and in some instances, migrants are barred from re-entry due to inability to access approved vaccinations. Accordingly, to mitigate risks of forced labour, FIFA and its multinational hotel partners have a heightened responsibility to ensure that work remains voluntary and remunerated. This requires urgent action to address wage theft practices.

Wage theft is most visible in cases where workers agree to particular terms of remuneration, complete the work, yet receive no payment. However, non-payment and underpayment of wages and severance in the range of forms described above all constitute wage theft.

In one case, a Nepalese worker employed at the Westin Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel and the host hotel for the Brazilian team—was promised a raise after her trial period. She never received it:

I have been working in the food and beverage department for a year. I was supposed to have a trial period of six months with a salary of 1,600 (Qatari) rial (\$440) but I am still only getting 1,300 (Qatari) rial (\$357). If the salary does not increase, I may return to Nepal.¹²⁸

C. Understaffing and Overwork

At the Ezdan Palace Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—workers employed through contractors in the Housekeeping Department reported significant understaffing, creating high levels of pressure at work. One worker explained:

There is no way that the number of workers matches the workload. In fact, we are short by half the number of workers required to do the job efficiently. We have to clean 10 rooms in 8 hours. The challenge is the rooms are not all empty at once. It depends on the check-out time of the guests. If our work is not completed on time, we have to work overtime, which means the company will have to pay us for overtime

duty. They do not want that. Rather, there is huge pressure for us to complete our work within the working hours.¹²⁹

At the Crowne Plaza Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—Housekeeping workers also described understaffing leading to overwork. One worker explained:

The hotel hired fewer workers than are required to do our job, and so we are overloaded with work and pressured to complete it. We work relentlessly. I work through my lunch break to keep my job. I work 9 hours a day with just a tea break, 7 days a week.¹³⁰

¹²⁸ A Nepalese worker employed at the Westin Hotel, Doha, Qatar. Interviewed in June 2020.

¹²⁹ A worker employed at the Ezdan Palace Hotel, Doha, Qatar. Interviewed in Qatar, April 2022.

¹³⁰ A worker employed in Housekeeping at the Crowne Plaza Hotel, Doha, Qatar. Interview conducted in Qatar, June 2022.

A Bangladeshi worker in the same hotel reported similar pressure due to understaffing—a situation made even more stressful in the absence of a formal employment contract:

The work volume exceeds our capacity. In order to save my job, I work through lunch every day. I am afraid to lose my job because I don't have a contract. On any day, the hotel management or subcontractor could ask me not to come.¹³¹

Understaffing and overwork was also reported by workers at the InterContinental Doha, West Bay—another FIFA World Cup Qatar 2022 hotel partner. In this hotel, workers employed both by contractors and directly by the hotel described understaffing and overwork.

A worker employed at this hotel in housekeeping through a facilities management contractor described understaffing in their department, leading to extended hours and overwork.

There are 155 workers in our department, but it is not enough manpower to manage the work. We work from 9 am until 9 pm—changing bed and towels, responding to customers, cleaning the floors and bathrooms, following health and safety rules, dusting furniture, and cleaning carpets and sofas.¹³²

An Indian worker hired directly by the hotel also described overwork in the housekeeping department:

We never get enough rest or sleep when the hotel is busy. We work like robots without food or water continuously, sometimes for 15 hours during peak season.¹³³

As one worker from this hotel explained:

From associates to the management level, if the hotel is busy, we have to stay. We are not paid for these extra hours.¹³⁴

At the JW Marriott Marquis City Center, West Bay, Doha—a FIFA World Cup Partner Hotel—workers in Housekeeping described the cumulative toll of working long hours on overnight shifts. A worker employed by a contractor explained:

I have worked the night shift for the last three years. Sometimes it is very difficult for us to complete all the work assigned to us. Sometimes the supervisors shout. Continuous night shifts using cleaning thinner and chemicals have negatively impacted my health.¹³⁵

***Protecting worker rights—procedures for addressing impossible workloads**

At the Crown Plaza, Doha, The Business Park—a FIFA World Cup Qatar 2022 partner hotel—workers experiencing heavy workloads in the Housekeeping Department described being able to call for help. A worker explained:

Housekeeping is physical, hard work. The management supports us to meet our targets. If I am unable to complete a task or running behind, I tell my supervisor and they send help.¹³⁶

Such practices of supporting workers to complete their targets, rather than placing pressure on workers to complete unreasonable targets, should be held up as an industry standard.

131 A Bangladeshi worker employed at the Crowne Plaza Hotel, Doha, Qatar. Interviewed in Qatar, June 2022.

132 A worker employed in Housekeeping through a contractor at the InterContinental Doha, West Bay. Interviewed in May 2022.

133 An Indian worker employed at the InterContinental Doha, West Bay. Interview conducted in Qatar, June 2022.

134 A worker at the InterContinental Doha, West Bay. Interview conducted in Qatar, June 2022.

135 A worker employed at the JW Marriot Marquis, City Center, West Bay, Doha. Interviewed in June 2022.

136 A worker employed at the Crowne Plaza, Doha—The Business Park. Interview conducted in Qatar, June 2022.

D. Workplace Violence

Verbal Abuse

A worker in the food service department of the Holiday Villa Hotel and Residence—a FIFA partner hotel groups—reported routine verbal abuse:

Our supervisor shouts at us all the time. For any small issue, he shouts and threatens to fire us. I continue to work in these conditions because I am afraid to lose my job.¹³⁷

A worker employed as a Security Guard at the same hotel also reported routine verbal abuse:

Sometimes we are mistreated by guests, but mostly we are mistreated by our supervisor. I face mental torture from my supervisor.¹³⁸

A Nepalese worker at the Hotel InterContinental, Manama in Bahrain described good practices from hotel management, including providing one-to-two month notice that contracts would not be renewed, honoring end-of-service entitlements, and helping workers find other employment opportunities.

A Bangladeshi worker employed in the same hotel described feeling targeted on the basis of his nationality:

We feel discrimination in this workplace. There are very few Bangladeshis working in this company, and we are shouted at more than other workers.¹³⁹

***Procedures for addressing verbal abuse—good practices from FIFA World Cup Qatar 2022 hotel partners**

At the Souq Waqif Boutique Hotel in Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—workers reported that there is no verbal abuse because supervisors take immediate action to address “mild shouting.” An Indian worker explained:

If there is any shouting at all, even if it is mild, we report it to our senior supervisors and they address it immediately. This is why we have no verbal abuse here.¹⁴⁰

Verbal abuse is a form of workplace bullying, which, if left unchecked, can escalate into more extreme forms of violence.¹⁴¹ Systematically addressing all forms of verbal abuse within hotels, even milder forms, is critical in creating safe work environments and preventing more extreme forms of GBVH. As an industry-wide condition of partnership for the FIFA World Cup Qatar 2022 and subsequent events, hotels should be required by FIFA to recognize all forms of verbal abuse as workplace violence and to implement immediate interventions to curb abusive dynamics.

Gender-based Violence and Harassment

Women workers described sexual harassment from colleagues. A Nepalese worker employed at the Crowne Plaza, West Bay, Doha-A FIFA World Cup Qatar 2022 hotel partner—explained:

137 A worker employed in the Food Service Department at the Holiday Villa Hotel and Residence. Interviewed in June 2022.

138 A worker employed as a Security Guard at Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

139 A Bangladeshi worker employed at the Holiday Villa Hotel and Residence. Interview conducted in June 2022.

140 An Indian worker employed at Souq Waqif Boutique Hotel, Doha. Interview conducted in Qatar, June 2022.

141 For instance, drawing from field research and the robust literature on workplace violence, the Asia Floor Wage Alliance, introduced the GBVH Escalation Ladder to demonstrate how workplace bullying can be a precursor to more aggressive forms of workplace violence on garment production lines. See *Asia Floor Wage Alliance’s Step-by- Step Approach to Prevent Gender Based Violence at Production Lines in Garment Supplier Factories in Asia*, <https://asia.floorwage.org/afwa-safe-circle-approach/>

We get sexual remarks from our colleagues often. They tease us. I get comments like, ‘wow, you look so sexy today,’ or ‘your makeup is superb—my heart is swooning,’ sometimes they touch us inappropriately while working together. I cannot say anything because if I do, they will say that it was unintentional and they will dismiss me. I just ignore comments and advances.¹⁴²

Guests also perpetrate sexual harassment and violence against hotel workers. At the InterContinental Doha, West Bay—a FIFA World Cup Qatar 2022 hotel partner—women from the Hospitality Department reported routinely facing sexual harassment from guests, including inappropriate touching and sexual propositions. These experiences were described as common experiences in the industry, not isolated incidents.

Workers at the Crowne Plaza, West Bay, Doha described a hotel policy of replacing female with male housekeeping workers when guests behaved inappropriately. Some workers described being able to report these incidents to their supervisors, reflecting strong communication within departments. Workers at the Crowne Plaza, West Bay, Doha described a hotel policy of replacing female with male housekeeping workers when guests behaved inappropriately.

***Protecting worker rights—hotel policies to safeguard workers against gender-based violence and harassment**

Housekeeping workers at the Crowne Plaza, West Bay, Doha—A FIFA World Cup Qatar 2022 hotel partner—described hotel policies designed to safeguard them from violence and harassment. A Nepalese worker explained:

We are in direct contact with guests, so female housekeeping staff are not allowed to work alone. We work in pairs—male and female staff together. We do not enter any rooms without a colleague. Housekeeping work is risky—we might get assaulted or accused of stealing. We have to be very careful.¹⁴³

Gender-based Restrictions on Mobility

Gender-based restrictions on mobility are a form of GBVH that are systematically perpetrated against women hospitality workers.¹⁴⁴ For example, women workers employed at the Crowne Plaza, West Bay, Doha—A FIFA World Cup Qatar 2022 hotel partner—described hotel policies restricting their mobility during work hours and at their accommodations. One Nepalese housekeeping worker explained:

As a woman, I face discrimination based on my gender. I have many examples. We have to let security at our accommodation know any time we leave, even if we are going to the supermarket. This does not apply to male workers. We have to report the time we will return to the hotel or the accommodation and inform security. If male workers stay out—even all night—and then report for their duty directly, no one will question them. We have to be at our accommodation camps by 9 pm, even on our days off.¹⁴⁵

Through discriminatory enforcement of such policies against women, FIFA World Cup Qatar 2022 hotel partners participate in widespread and systematic GBVH in ways that have been socially sanctioned and normalized in the region.

142 A Nepalese worker employed at the Crowne Plaza, West Bay, Doha, Qatar. Interviewed in April 2022.

143 A Nepalese worker employed at the Crowne Plaza, West Bay, Doha, Qatar. Interviewed in April 2022.

144 General Recommendation No. 19 on Violence against Women, adopted by the CEDAW Committee, defines gender-based violence as “violence which is directed against a woman because she is a woman or that affects women disproportionately, and, as such, is a violation of their human rights” (article 1). Forms of gender-based violence named by General Recommendation No. 19 include acts that inflict physical harm, mental harm, sexual harm or suffering, threats of any such acts, coercion, and deprivations of liberty.

145 A Nepalese worker employed at the Crowne Plaza, West Bay, Doha, Qatar. Interviewed in April 2022.

E. Occupational Health and Safety Risks

FIFA’s COVID-19: *Medical Considerations for a Return to Footballing Activity*¹⁴⁶ addresses key planning considerations for the organisation of footballing events in the context of the ongoing COVID-19 pandemic. The health measures therein, penned by FIFA and the WHO, consider hygiene and distancing in training facilities and stadiums, testing and monitoring, and travel precautions designed to protect players and spectators. However, health and safety risks for hotel workers are entirely unaddressed.

Our field research found that across the region, hotels have exposed their staff to extreme health risks during successive waves of the COVID-19 pandemic. This irresponsible track record among hotels belonging to FIFA partner hotel groups demonstrates the urgent need for FIFA to include hotel workers in its *Medical Considerations for a Return to Footballing Activity*, and to require all FIFA multinational hotel partners to adopt and enforce rigorous occupational health and safety plans and protocols. Procedures should ensure that workers are never pressured to risk their health to keep their jobs and that all workers who fall sick on the job have access to high-quality medical care.

Exposure to COVID-19

The migrant workers we interviewed reported that when hotels remained open during the pandemic, they were required to report for work, frequently in conditions that risked their health and safety.

A Bangladeshi worker at the Mövenpick Hotel West Bay in Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel—described how management pressured him to work against his will, including

predicating wages on acceptance of high levels of COVID-19 exposure risk, exposing him and other workers to COVID-19 prior to vaccines being released on the global market.

The (Qatari) government booked the whole hotel for COVID-19 patients. Management offered us work with salary. If we refused to work, we would still receive food and accommodation, but no salary. Many of us refused to work. Then we received pressure from management to work.¹⁴⁷

At the Crowne Plaza, West Bay, Doha, Qatar—a FIFA World Cup 2022 partner hotel—workers reported that almost 40% of hotel employees contracted COVID-19.

At the Crowne Plaza—The Business Park, Doha, Qatar—another FIFA World Cup 2022 partner hotel—workers in the Housekeeping Department were particularly at risk. One Housekeeping worker explained:

A lot of us got COVID. Housekeeping is difficult. We had guests who were positive. Sometimes we didn’t know, and we had to provide services.¹⁴⁸

A worker employed as a Valet through a contractor at Souq Al Wakra Hotel—the host hotel for the England team—also reported an outbreak of COVID 19 among his colleagues, despite workplace precautions:

We followed the Qatar government rules. We maintained social distance and used face masks and sanitizers. At least 20-25 of my colleagues contracted COVID 19. At least 20-25 of my colleagues contracted COVID 19.¹⁴⁹

146 FIFA, COVID-19: Medical Considerations for a Return to Footballing Activity”, available online at: <https://digitalhub.fifa.com/m/76c7b588896dd8a7/original/buajfz5eqfcdqdzxm42-pdf.pdf>

147 A Bangladeshi worker employed at the Mövenpick Hotel West Bay, Doha. Interviewed in December 2020.

148 A worker employed in the Housekeeping Department at the Crowne Plaza—The Business Park, Doha, Qatar. Interview conducted in Qatar, July 2022.

149 A Bangladeshi worker employed at the Marriot Palm Jumeirah, UAE. Interviewed in October 2020.

At the Holiday Villa Hotel and Residence, Doha, Qatar—a FIFA World Cup 2022 partner hotel—a reported twenty workers contracted COVID-19, despite measures taken by the hotel including providing masks and sanitizers.

A Bangladeshi worker at the Marriott Palm Jumeirah in the UAE described feeling a mix of compulsion and fear as they faced an impossible choice: risk your health or lose your salary.

Certainly, I am afraid to work. I hear that many people are dying. But a job is a job. What if they fire me if I don't work? What if they send me back home?¹⁵⁰

Workers whom we interviewed overwhelmingly described strict COVID-19 protocols. A Bangladeshi worker employed at the Hotel InterContinental, Manama in Bahrain described a series of health protocols:

Before entering the hotel, they check our temperature, we wash our hands and use sanitizer. We must wear masks and strictly obey social distancing rules. We have to follow the instructions provided by the Health Ministry. All employees are tested for COVID-19 by the employer.¹⁵¹

Workers employed in the Hotel InterContinental in Manama, Bahrain; the JW Marriott Hotel, Kuwait City, Kuwait;¹⁵² the Marriott Marquis, City Centre, West Bay, Qatar;¹⁵³ the Holiday Inn Riyadh—Olaya, Saudi Arabia;¹⁵⁴ and the JW Marriott Marquis Hotel, Dubai, UAE¹⁵⁵ all described similarly rigorous workplace health and safety protocols.

Workers from these and other hotels also described receiving up-to-date information on COVID-19 and health protocols from hotel management. These are good practices that satisfy international labour standards under the Occupational Safety and Health Convention, 1981 (No. 155) (Article 19). Consistent with these robust health measures, most workers described being provided PPE in the workplace.

Yet, despite these precautions, workers who continued to report for duty during the pandemic described risking not only their physical wellbeing but also their mental wellbeing, especially as they watched colleagues fall ill.¹⁵⁶ A Bell Attendant at the Centro Capital, Doha in Qatar—a Rotana Hotel Group key and a FIFA partner hotel—explained:

The hotel briefed and trained us on COVID-19 protocols. They gave us support to take precautions. Here, lots of staff still tested positive and a few even fell sick.¹⁵⁷

Health Risks at Labour Camps and in Employer Provided Housing

Workers employed at FIFA World Cup Qatar 2022 hotel partners and their regional partner hotels reported that while hotels enforced safety precautions within the hotel, those standards were not extended to worker accommodations. Considering COVID-19's high rate of household transmission,¹⁵⁸ overcrowding in employer-provided accommodations created dangerous environments where the virus could easily spread among workers.

A worker employed in housekeeping through a contractor at the JW Marriott Marquis City Center,

150 A Bangladeshi worker employed at the Marriot Palm Jumeirah, UAE. Interviewed in October 2020.

151 A Bangladeshi worker employed at the Hotel InterContinental in Manama, Bahrain. Interviewed in September 2020.

152 A Bangladeshi worker employed at the JW Marriott Hotel, Kuwait City, Kuwait. Interviewed in October 2020.

153 An Indian worker employed at the Marriott Marquis, City Centre, West Bay, Qatar. Interviewed in December 2020.

154 A Bangladeshi worker employed at the Holiday Inn Riyadh--Olaya, Saudi Arabia. Interviewed in October 2020.

155 A Bangladeshi worker employed at JW Marriott Marquis Hotel, Dubai, UAE. Interviewed in October 2020.

156 A Nepalese worker employed at the JW Marriott Marquis Hotel in Dubai. Interviewed on December 29, 2020.

157 A worker employed at City Centre Rotana Doha, West Bay, Doha, Qatar. Interviewed in April 2022.

158 Brizuela, Noel Gutierrez, Humberto Gutierrez Pulido, Kimberlyn Roosa, Nestor Garcia Chan, Jorge Hernandez-Bello, Jose Francisco Munoz-Valle, Gabriela Macedo-Ojeda et al. "Prevention of household transmission crucial to stop the catastrophic spread of COVID-19 in cities." medRxiv (2020). Available online at: <https://www.medrxiv.org/content/10.1101/2020.06.05.20123711v1>

West Bay, Doha—another FIFA World Cup Partner Hotel—described his living conditions:

We live with six people in one small room. We put our personal belongings and cooking items in the same room under the bed. There is no room for social distancing. Since we keep our cooking things in the room, we get insects.¹⁵⁹

Overcrowding is particularly dangerous in large worker housing camps, which, according to a Nepalese working in a Marriott hotel in the UAE, can house up to 2,000 employees.¹⁶⁰ A Bangladeshi worker living in an employer-provided accommodation provided by the Hotel InterContinental, Manama in Bahrain described his experience:

It is not possible to maintain physical distance at our accommodation. We try our best to stay away from each other, but the number of workers at our camp is high. I know of 22 workers who were infected with COVID-19, not at the hotel, but at our accommodation.¹⁶¹

Another worker at the Hotel InterContinental, Dubai in the UAE described how it was impossible to effectively distance in his accommodation because he was sharing a small room with ten other people.¹⁶² Such overcrowding in accommodations is a deliberate decision made by employers to save costs at the expense of worker health and safety.

***Good practices—safe accommodation**

A worker employed as a Valet through a contractor at Souq Al Wakra Hotel—the host hotel for the England team—reported good accommodation practices that helped to control the spread of COVID 19:

The company accommodation provides good living conditions. Four people share a room. We are provided with masks and sanitizers.¹⁶³

Some companies extended the same level of precautionary measures taken within the workplace to employer-provided housing. One Indian worker employed at the JW Marriott Marquis Hotel in the UAE described such measures:

The company announced lock downs in our accommodation. Workers in the accommodation were strictly instructed not to go outside. Social distancing became very strict in the hotel and in our accommodation. The company provided masks and sanitizers for all those who were on duty and also at our accommodation. Thermal checkups were regular during working hours. Very few employees got COVID. Those who did were isolated and provided instructions to control the spread.¹⁶⁴

A Bangladeshi worker at the Holiday Inn Riyadh - Olaya in Saudi Arabia also described feeling that his accommodation was safe due to good employer practices:

159 A worker employed at the JW Marriott Marquis City Center, West Bay, Doha. Interviewed in June 2022.

160 A Nepalese worker employed at a Marriott Hotel in the UAE. Interviewed in December 2020.

161 A Bangladeshi worker employed at the Hotel InterContinental, Manama in Bahrain. Interviewed in October 2020.

162 An Indian worker employed at the Hotel InterContinental, Dubai, UAE. Interviewed in July 2020.

163 A worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

164 An Indian worker employed at the JW Marriott Marquis Hotel, UAE. Interviewed in January 2021.

There was sufficient space for us at the camp. We were 3 people in a room previously. Since many workers were on vacation, 2 could stay in one room. The hotel has been providing sanitizers and masks.¹⁶⁵

Such practices provide a sound template and industry standard around workplace accommodations during health emergencies that should be integrated into state policies, enforceable multinational hotel guidelines, and workplace-level practice guides.

Employer treatment of hotel workers who contracted COVID-19

Every hospitality worker with whom we spoke knew of someone from their workplace who had contracted COVID-19. In some cases, COVID-19 spread rapidly among hotel staff. In most cases, hospitality workers who fell ill were taken to government hospitals and then quarantine centers. Workers who contracted COVID-19 described significant difficulties accessing adequate care. Equidem’s *Cost of Contagion* contains multiple testimonies illustrating the poor conditions that migrants face in quarantine.¹⁶⁶ One worker reported facing delays in accessing quarantine, waiting nearly three weeks before their employer acted. When access to a quarantine center was provided, workers reported overcrowding, lack of medical staff, and sick patients being quarantined for excessive time periods, precipitating reinfection in one worker’s case. Due to the maltreatment that migrants received, some were reluctant to report symptoms to avoid being quarantined. Others avoided quarantine because they needed to continue earning wages.

Access to Health Services

Commendably, Qatar and Saudi Arabia promised free medical treatment for COVID-19 to all migrant workers regardless of legal status. However, migrant workers seeking to access healthcare faced persistent challenges due to increases in COVID-19 cases¹⁶⁷ and nationality-related discrimination.

A Bangladeshi worker employed in the Mövenpick Hotel West Bay Doha in Qatar — a FIFA World Cup Qatar 2022 hotel partner — explained:

As migrant workers, we have had problems accessing medical care for general illness. Access to hospitals was a problem because most hospitals only accepted serious cases during COVID-19. (Qatari) national and western people were given priority in accessing hospitals.¹⁶⁸

A Bell Attendant at the Centro Capital, Doha in Qatar—a FIFA World Cup Qatar 2022 partner hotel—explained that migrant workers are sent to distinct locations for treatment from nationals, in government health centers that are difficult to reach:

Here, for labour, there is a different government hospital that is far from the city. In order to go to the hospital, you have to spend the whole day.¹⁶⁹

Limited access to healthcare, exposure to health risks in the hospitality sector, and long working hours put migrant workers at increased risk of adverse health outcomes, including high rates of work-related accidents and mental health issues.¹⁷⁰

165 A Bangladeshi worker employed at the Holiday Inn Riyadh - Olaya, Saudi Arabia. Interviewed in October 2020.

166 Equidem, *The Cost of Contagion: The human rights impacts of COVID-19 on migrant workers in the Gulf*, available online at [HYPERLINK “https://www.equidem.org/reports/the-cost-of-contagion”https://www.equidem.org/reports/the-cost-of-contagion](https://www.equidem.org/reports/the-cost-of-contagion).

167 A Bangladeshi worker employed at Mövenpick Hotel West Bay Doha in Qatar. Interviewed in December 2020.

168 A Bangladeshi worker employed at the Mövenpick Hotel West Bay, Doha. Interviewed in December 2020.

169 A worker employed at the Centro Capital, Doha Hotel, Qatar. Interviewed in April 2022.

170 S. Joshi, P. Simkhada, and G. Prescott, “Health problems of Nepalese migrants working in three Gulf countries,” *BMC International Health Human and Rights* (2011): e3., available online at: <https://bmcinthealthhumrights.biomedcentral.com/articles/10.1186/1472-698X-11-3#:~:text=In%20the%20previous%20study%20by,kidney%20failure%20and%20mental%20trauma>.

Workers who had experienced pandemic-related job loss or challenges renewing their work permits were required to personally bear all health-related expenses, compounding the financial impact of unemployment. A Nepalese worker at Al Safir Hotel in Bahrain explained:

I have an offer letter from the company, but my visa has expired. The company applied for my visa renewal but it was rejected. Since I do not have a visa, I do not have health insurance. The company does not take responsibility for my health. I have to go to a private hospital and pay the expenses myself if I get sick.¹⁷¹

Where national social protection floors fall short, hotel companies have a responsibility to mitigate health risks to their employees by maintaining accessible facilities. Access to affordable and appropriate healthcare should be mandatorily provided as an industry standard. FIFA should help drive these risk mitigation measures by making multinational hotel partnerships contingent upon hotel-level healthcare access plans that draw from and supplement state services.

***Protecting workers’ occupational health and safety—good practices from FIFA World Cup Qatar 2022 hotel partners**

Our research also identified some instances in which hotels provided a high level of care to their workforce. A Nepalese worker employed at the JW Marriott Marquis Hotel in the UAE described his experience while sick with COVID-19:

I was infected with COVID-19 15 days ago, so were three other workers in my shift. I tested positive and informed the hotel. They gave me my own room with an attached bathroom. They

provided me with packed food from outside. My roommate has still not recovered. He is in isolation. The hotel is 100% responsible for the workers, from testing for COVID-19 to taking care of them. Doctors are in constant communication with sick workers and if they notice any complications they are immediately taken to the hospital.¹⁷²

An Indian worker employed at a hotel in Kuwait also described workers receiving good care, including appropriate food and facilities while sick.¹⁷³

A Bell Attendant at the Centro Capital, Doha in Qatar—a FIFA World Cup Qatar 2022 partner hotel—described access to sick leave and health insurance for all company employees:

If anyone falls sick, the hotel gives them leave and pay(s) for treatment. Here, we all have health insurance.¹⁷⁴

Responsible employer practices, including on-site health clinics within hotels, provide an important avenue for healthcare access in the absence of non-discriminatory access to social protection frameworks. An Indian worker employed at the JW Marriott Marquis Hotel in the UAE described how these services function in the hotel where he works:

We have a health clinic inside the hotel. A duty doctor, paramedic, and nurse are available around the clock to give check-ups. The medical team provided us information on COVID-19 signs, symptoms, modes of transmission, and precautions to be taken at work. We were all aware and ready for work. News channels and social media also provided updates on COVID-19.¹⁷⁵

171 A Nepalese worker at the Al Safir Hotel, Bahrain. Interviewed in October 2020.

172 A Nepalese worker employed at the JW Marriott Marquis Hotel, UAE. Interviewed in December 2020.

173 An Indian worker employed at a hotel in Kuwait. Interviewed in September 2020.

174 A worker employed at the Centro Capital, Doha Hotel in Qatar. Interviewed in April 2022.

175 An Indian worker employed at the JW Marriott Marquis Hotel, UAE. Interviewed in January 2021.

The practices described in this section should be used as an industry benchmark. Employers should not require workers to expose themselves to risk of infection. When workers do assume infection risks, they should be given paid sick

leave for any days of illness and provided with access to care services directly provided by the employer or other adequate healthcare facilities covered by employer-provided insurance.

F. Abusive Workforce Downsizing

When the 2022 FIFA World Cup in Qatar ends, one million fans and tourists will leave the country. The conclusion of the games will significantly change hotel occupancy, emptying an anticipated 130,000 hotel rooms. Our research found that when hotels downsize operations, migrant workers experience abrupt layoffs and terminations. To prevent abusive workforce downsizing, FIFA should require multinational hotel partners to establish and implement workforce downsizing plans and protocols in line with international human rights standards, including adequate notice to employees and provision of termination benefits.

Abrupt Termination

During the COVID-19 pandemic, our research uncovered a pattern of abrupt terminations in FIFA World Cup Qatar 2022 partner hotels, as well as hotels associated with FIFA multinational hotel partners across Bahrain, Kuwait, Qatar, Saudi Arabia, and the UAE. At the Holiday Villa Hotel and Residence, for instance—a FIFA World Cup Qatar 2022 partner hotel—a worker explained:

*I was laid off because the hotel reduced staff during the [COVID 19] pandemic. They did not give me any notice or [severance] payment. I reported for duty and they simply told me to return to the accommodation. Three weeks later, I was laid off.*¹⁷⁶

In some cases, hotels linked to FIFA multinational hotel group partners were shut down entirely, and hundreds of workers lost their jobs at once. An Indian worker employed at the Fairmont Hotels and Resort, Abu Dhabi in the UAE reported:

*After the pandemic spread, the hotel closed. Along with me, more than 160 workers lost their jobs.*¹⁷⁷

At the Voco Dubai hotel in the UAE, an Indian worker reported that at least 200 workers lost their jobs.¹⁷⁸

A Nepalese woman employed at the JW Marriott hotel in Kuwait reported that around 300 workers lost their jobs over the course of three months without prior notice—either via termination or non-renewal of employment contracts.¹⁷⁹

Ad Hoc Downsizing

Absent established workforce downsizing plans and protocols, hotels adopted ad hoc approaches to workforce downsizing throughout the COVID-19 pandemic, with significant consequences for migrant hotel workers.

A worker at Voco Dubai in the UAE described unpredictable company responses and their impact on staff in the hotel where he worked from March 2020 to January 2021:

176 A worker employed at the Holiday Villa, Hotel and Residence. Interview conducted in Qatar, June 2022.

177 An Indian worker employed at Fairmont Hotels and Resort. Interviewed in October 2020

178 An Indian worker employed at the Voco Dubai, UAE. Interview conducted in the UAE, January 2021.

179 A Nepalese worker employed at the JW Marriott Hotel, Kuwait. Interviewed in October 2020.

During the first lockdown in April, our company’s income was nil. We had only a few long-stay guests. Initially many of our staff were terminated, and many others, like me, were forced to take unpaid leave or pending annual vacation. After four months of lock down, in August, our company opened a few floors, and decreased the number of working days. In October things were back to normal and we got customers as usual. Now the company has staff shortages. They have called some of the staff they terminated back to work.¹⁸⁰

In the first year of the COVID-19 pandemic, this hotel terminated staff, put others on paid leave, and required others to take unpaid vacation. These responses allowed the hotel to save money they would have otherwise owed in wages while maintaining access to a ready pool of workers for when business resumed. The company contracted and expanded staff in line with the evolving short-term needs at the hotel.

In a Marriott hotel in the UAE, workers in the Cleaning and Food and Beverages Departments faced varying employment scenarios depending on hotel needs: some workers were required to maintain the facility, while others received up to 75% reduction in working hours and wages. These distinct practices within the same hotel underscore the flexibility maintained by hotel management in expanding and contracting the workforce according to their needs.

In some cases, determinations of which employees would maintain employment was entirely circumstantial, depending for instance on whether workers were at their accommodations or within the hotel when lockdowns were imposed.

A member of the Housekeeping Staff employed in the same Marriott hotel in the UAE described continuing to work throughout the pandemic on the grounds that he was at the hotel when a lockdown was imposed in the UAE:

When the national lockdown started, the company announced a lockdown in our accommodations and at the hotel. Those of us who were in the hotel at the time were instructed to stay in the hotel and continue our work. The employees in the accommodation were instructed to stay there.¹⁸¹

Absent clear guidelines safeguarding the lives and livelihoods of migrant workers during the pandemic, workers in this one Marriott hotel described a range of scenarios—full-time work, partial employment, and use of paid leave to secure access to wages while unemployed. Such arrangements, far from systematic, were dictated entirely by employer requirements. Overall, these snapshots of varying hotel responses to market contractions provide insight into a broader sectoral pattern of displacing the costs of market uncertainty onto migrant workers.

Differential Impact on Migrant and Contract Workers

Migrant workers who had attended less school and were employed as contract workers were the first to lose their jobs. A worker employed at the Voco Dubai hotel in the UAE, described the distinct impact of rapid downsizing on workers from different demographics:

Almost 200 staff members were terminated without prior notice—that is almost 30% of the staff. They terminated workers who did not complete school and did not hold professional positions first. These changes in payroll mainly impacted migrant workers.¹⁸²

¹⁸⁰ A worker employed at Voco Dubai, UAE. Interviewed in January 2021.

¹⁸¹ An worker employed at a Marriott Hotel in the UAE. Interviewed in January 2021.

¹⁸² A worker employed at Voco Dubai, UAE. Interviewed in January 2021.

Contract workers were among the first to lose their jobs. A Chef employed at the Ramada Encore in Kuwait described termination of 70% of the staff, all of whom were employed as contract workers and therefore vulnerable under rapid workforce contraction.¹⁸³

Abusive Treatment of Workers Serving Notice Periods

At the Dusit Doha Hotel, West Bay, Doha Qatar—a FIFA World Cup Qatar partner hotel—workers reported experiencing abuses while serving their notice period. A worker reported giving the hotel a one-month notice period, as required by Qatari law, prior to transferring to another hotel. During this one-month period, the hotel prevented him from working and refused to provide food as required under his contract. He explained:

I resigned because I had a job opportunity with another company. I gave one month’s notice as required by law. When I resigned, they stopped me from working my notice period. I had to stay in their accommodation before starting the new job, but they did not provide me with any food. They stopped me from working and did not pay me so I had no money to buy food. I would have starved if my friends had not helped me.¹⁸⁴

Such practices undermine labour mobility among migrant workers, a critical issue identified by the FIFA Human Rights Advisory Board in their Third Report.

Inability to Obtain No Objection Certificates (NOCs)

Equidem and GLJ-ILRF spoke to workers at FIFA World Cup Qatar 2022 hotel partners who described ongoing barriers to obtaining No Objection Certificates (NOCs) as an obstacle in changing employers. Notably, NOC requirements—previously a precondition to freeing migrant workers from their obligations to former employers and allowing them to find new jobs and sponsors—were eliminated by Qatar in 2020. Despite these labour law changes, workers employed by FIFA World Cup Qatar 2022 hotel partners described difficulties obtaining NOCs as a barrier to switching employers. These findings suggest that migrant workers have not been well informed about labour law changes and still perceive their employers as having the authority to prevent them from transferring between employers.

For instance, at the Holiday Villa Hotel and Residence in Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—workers reported wanting to change jobs but being unable to do so because hotel management would not provide the NOC required to change employers. An Indian worker explained:

I do not want to work in this company any longer, but the company will not give me an NOC to work with another company. I already have an offer from another company, but because I can’t get an NOC, I cannot leave. This hotel does not consider workers’ needs.¹⁸⁵

183 A worker employed as a Chef at the Ramada Encore, Kuwait. Interview conducted in Kuwait, September 4, 2020.

184 A worker employed at the Dusit Doha Hotel, Qatar. Interview conducted in Qatar, June 2022.

185 An Indian worker employed at the Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

Another Indian worker reported that he was threatened with repatriation for requesting an NOC to transfer to another job:

They took me to the head office and threatened me. They told me to take back my documents requesting a transfer [NOC]. They told me that if I did not take back the request to transfer employers, I would be sent back to India. I did not take back my NOC request. I told them I would rather go home than work in this hotel.¹⁸⁶

A worker employed as a Valet through a contractor at Souq Al Wakra Hotel—the host hotel for the England team—reported:

I requested an NOC through HR, but the management refused to give it. My employer will not give NOCs. They keep our Qatar ID cards on hold. 2-3 workers from my company had to return home on cancelled visas. The employer is still keeping their Qatar ID on hold.¹⁸⁷

A worker employed in housekeeping through a contractor at the JW Marriott Marquis City Center, West Bay, Doha—another FIFA World Cup Partner Hotel—also reported that the contractor he works for refuses to provide workers with NOCs to shift between employers.

***Good practices - Notice, termination benefits, and visa extensions**

A Nepalese worker employed at the Hotel InterContinental, Manama in Bahrain described good practices from hotel management, including providing one-to-two month notice that contracts would not be renewed, honoring end-of-service entitlements, and supporting workers to find other employment opportunities:

The hotel has not fired anyone, but workers with contracts that were ending were not renewed. They were given 1-2 months’ notice and provided end-of-service entitlements. The hotel has also said that they would help workers find jobs.¹⁸⁸

Workers in other hotels, like the JW Marriott and Marriott Courtyard in Kuwait¹⁸⁹ and the Voco Dubai in the UAE,¹⁹⁰ also reported that they were provided with end-of-service entitlements. Unfortunately, however, as discussed in the earlier section on wage theft, such basic measures, consistent with decent work standards, were denied to migrant workers employed in the hospitality sector across the region.

Risks of Termination and Barriers to Accountability for Rights Violations

For migrant workers in the GCC, barriers to exit and re-entry heighten the costs and risks associated with loss of work. The high costs of losing employment give employers even more power in setting wages and working conditions. Faced with the threat of termination, workers have had to accept lower wages, further compounding the harms of discriminatory working conditions, wage theft, and occupational health and safety described in previous sections.

A Bell Attendant at the Centro Capital, Doha in Qatar—a Rotana Hotel Group key and a FIFA World Cup Qatar 2022 partner hotel—described challenges in returning to Qatar among hotel employees who were required to take vacation during the pandemic:

¹⁸⁶ A worker employed at the Holiday Villa Hotel and Residence, Doha Qatar. Interview conducted in Qatar, June 2022.

¹⁸⁷ A worker employed at Souq Al Wakra Hotel, Doha, Qatar. Interviewed in July 2022.

¹⁸⁸ A Nepalese worker employed at the Hotel InterContinental, Manama, Bahrain. Interviewed in September 2020.

¹⁸⁹ A Nepalese worker employed at the JW Marriott, Kuwait. Interviewed in October 2020. A Nepalese worker employed at the Marriott Courtyard in Kuwait. Interviewed in October, 2020.

¹⁹⁰ An Indian worker, employed at Voco Dubai, UAE. Interviewed in January 2021

They did not fire staff but required them to go on vacation. Now some people can't come back because of entry permit issues—they need to get a government entry permit, and that is difficult to get.¹⁹¹

For migrant workers, barriers to exiting and re-entering Qatar are high, heightening the toll of losing employment. The ability of South Asian workers to return to GCC destination states changed drastically with the onset of the second wave of COVID-19. For instance, male workers who seek to exit the country are now required to travel to new immigration service centers located far from the service and employment hubs where they live. These centers are not accessible by public transportation, requiring low-wage migrant workers to arrange transportation by car or carpool, a significant increase in the cost of returning home.

Workers who are already within Qatar and need to return home temporarily for visa renewal also face heightened costs of leaving, and risk being barred from re-entry while between jobs. For Nepalese workers, for example, failure to return home jeopardizes their legal status since the Nepalese government requires workers to return to Nepal periodically to renew their permission to migrate. Failure to renew permission to migrate renders them undocumented in the eyes of the Nepalese state. Caught between GCC and Nepalese migration governance regulations, Nepalese workers are confronted with a lose-lose situation: either remain in the GCC and lose permission to migrate from Nepal; or return to Nepal to secure migration permission, and risk being unable to re-enter the GCC due to challenges in accessing vaccines. Furthermore, due to pandemic-related complications to labour migration, employers prefer hiring workers already in the country, which limits employment prospects for migrant workers who have returned to their home countries and who must secure employment before being able to return to the GCC.

G. Inadequate Systems for Workers to File Complaints

After intense criticism, in 2018, Qatar reformed its system for adjudicating allegations of labour rights violations. However, the workers we interviewed said that most workers do not know where to file complaints. At the Ezdan Palace Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—worker employed through contractors reported significant challenges in seeking relief for rights violations. One worker in the housekeeping department explained:

There is no point in complaining, we will only be shifted to a new place of work. The company does not want to ruin its relationship with the hotel, and the hotel does not want to tarnish its reputation. No one will listen.¹⁹²

At the Holiday Villa Hotel and Residence, Doha, Qatar—a FIFA World Cup Qatar 2022 hotel partner—an Indian worker described inadequate channels to seek relief for rights violations:

191 A worker employed as a Bell Attendant at Centro Capital, Doha. Interviewed in April 2022.

192 A worker employed at the Ezdan Palace Hotel, Doha, Qatar. Interview conducted in Qatar, April 2022.

I have complained many times about how I am treated by my supervisor, but the management does not care about these issues.¹⁹³

A Security Guard employed at the same hotel also reported unreliable mechanisms for lodging complaints:

If we face any problems, we inform senior employees and sometimes they take action and sometimes they don't. We have a 50% chance of getting our issue addressed. I don't feel comfortable making reports to our department head, but I have still reported my supervisor for shouting too much¹⁹⁴

Workers have also reported concerns about filing a complaint due to lack of faith in remedies and fear of retaliation, including deportation.¹⁹⁵ A worker employed in the Crowne Plaza West Bay, Doha, Qatar — a FIFA World Cup Qatar 2022 hotel partner — reported reluctance to share rights violations due to the inaccessibility of the Qatari legal system and fear of retaliation by supervisors:

I do not feel comfortable reporting because later on if I make even small mistakes on the job, my boss might take action and fire me. If I go to the court, the process is very long and you cannot fly to your home country until it is resolved.¹⁹⁶

Contract workers face an even higher risk of retaliation. A Nepalese worker employed at the Crowne Plaza, West Bay, Doha—a FIFA World Cup Partner Hotel—explained:

Workers employed by contractors or as interns—whether long or short term—face more abuse. I am directly hired

by the hotel so at least I have a place to complain. When contract workers complain, they are fired immediately.¹⁹⁷

Workers' lack of faith in the system is well-founded. Amnesty International found that by January 2020, twenty-five workers employed on FIFA World Cup Qatar 2022 stadium sites had submitted complaints, which were referred for mediation. Some firms agreed to pay workers what they were owed but never complied with the agreement. Other firms said they would pay back wages only if workers left their jobs and returned to their country of origin. Some workers who refused this option were not permitted to continue working.¹⁹⁸ While Qatar and other GCC states should take measures to ensure adequate complaint mechanisms are in place, until such systems are in place, hotel companies have a responsibility to ensure adequate complaint mechanisms within their facilities as an industry standard.

***Good practices—procedures to address workplace rights violations**

Workers with whom we spoke stated that internal mechanisms to address worker complaints, while not a substitute for freedom of association, can be effective. Such mechanisms include clear reporting procedures, department heads and human resources personnel trained to document and act on worker complaints, and proper complaint management.

A worker employed at Souq Al Wakra Hotel—the host hotel for the England team—described hotel procedures for reporting rights violations and grievances at work:

¹⁹³ A worker employed at the Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

¹⁹⁴ A Security Guard at Holiday Villa Hotel and Residence, Doha, Qatar. Interviewed in June 2022.

¹⁹⁵ Human Rights Watch, 2020, “How Can We Work Without Wages?: Salary Abuses Facing Migrant Workers Ahead of Qatar’s FIFA World Cup 2022,” p. 31, available online at: https://www.hrw.org/sites/default/files/media_2020/08/qatar0820_web_3.pdf.

¹⁹⁶ A worker employed at the Crowne Plaza West Bay, Doha, Qatar. Interviewed in June 2022.

¹⁹⁷ A Nepalese worker employed at Crowne Plaza West Bay, Doha, Qatar. Interviewed in April 2022.

¹⁹⁸ Amnesty International, “Qatar World Cup of Shame”, available online at: <https://www.amnesty.org/en/latest/campaigns/2016/03/qatar-world-cup-of-shame/#:~:text=Migrants%20building%20a%20state%20of,workers%20in%20Qatar%20from%20abuse>.

There are options to report rights violations. First, workers can directly report to their supervisors, and if they want to withhold their identity, they can do so. Second, workers can raise issues at a staff meeting. Third, a worker can bring it to the knowledge of a staff survey committee.¹⁹⁹

A worker employed through a contractor at the Westin Hotel, Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel and the host hotel for the Brazilian team—described effective reporting procedures:

The hotel has reporting procedures, and the contractor I work for also has reporting procedures. If I face a problem, I know what to do.²⁰⁰

A Bell Attendant at the Centro Capital, Doha in Qatar—a FIFA World Cup Qatar 2022 partner hotel—explained:

We have a department head and a human resources department. If anyone makes a report, they will get a response.²⁰¹

A Filipina worker employed at the Crown Plaza, Doha, The Business Park—a FIFA World Cup Qatar 2022 partner hotel—described monthly meetings with the General Manager designed to address workplace challenges:

We have monthly coffee with our General Manager. In this one-hour meeting, we share and talk through any struggles we have at work. This is a good experience. We express what we need and the company responds.²⁰²

In addition to monthly meetings, workers at the Crown Plaza, Doha, The Business Park reported robust internal complaint processes. A Ghanaian worker employed in the at this hotel explained:

The Crowne Plaza takes complaints seriously. They have an internal complaints platform where you can lodge a complaint against colleagues, managers, or guests. It is a good thing – in the previous hotel where I worked, I could not lodge complaints, management didn't care or want to know.²⁰³

Multinational hotel groups should draw from these good practices in developing effective protocols. FIFA has a role to play in driving risk mitigation measures by making multinational hotel partnerships contingent upon access to adequate complaint mechanisms and forums for worker input and engagement.

199 A worker employed at Souq Al Wakra Hotel. Interviewed in July 2022.

200 A worker employed through a contractor at the Westin Hotel, Doha, Qatar. Interviewed in June 2022.

201 A worker employed at the Centro Capital Doha, Qatar. Interviewed in April 2022.

202 A worker employed at the Crown Plaza, Doha, The Business Park. Interview conducted in Qatar, July 2022.

203 A worker employed at the Crown Plaza, Doha, The Business Park. Interview conducted in Qatar, June 2022.

FIFA's Role in Upholding Labour Rights Standards in the Hospitality Sector

4



The findings of this report provide guidance for urgent measures FIFA can take to protect the rights of migrant workers employed not only in Qatar, but across the GCC states. Given our understanding of how rights violations

are rooted in industry and employment practices, these findings are also relevant to protecting the rights of workers employed in the hospitality sector in other parts of the world.

I. Urgent Action FIFA Can Take to Protect Labour Rights in the Hospitality Sector

A. Call for Immediate Action from Hotel Partners

Equidem and GLJ-ILRF welcome FIFA’s efforts to promote human rights, including by encouraging national football associations to do their own due diligence on hotels in Qatar. Multinational hotel groups have unique capacity to set and enforce industry standards in the hotel sector.

This includes not only the ability to ensure that their hotel partners abide by multinational branding and service standards, but also that all workers employed in their hotels are protected by fair employment contracts, rigorous assessment to mitigate labour and human rights risks, and adequate remedy procedures to address labour and human rights harms.

Call for FIFA World Cup Qatar 2022 hotel partners to immediately adopt and enforce labour and human rights due diligence and remedy standards in Qatar and across their regional hotels

Equidem and GLJ-ILRF welcome FIFA’s efforts on human rights, including encouraging national football associations to do their own due diligence of hotels in Qatar. Multinational hotel groups have the unique capacity to set and enforce industry standards in the hospitality sector. This includes not only the ability to ensure that their hotel partners abide by multinational branding and service

standards, but also that all workers employed in their hotels are protected by fair employment contracts, rigorous risk assessment to mitigate labour and human rights violations, and adequate remedy procedures in cases of rights violations.

FIFA should require its multinational hotel group partners²⁰⁴ to immediately adopt rigorous labour and human rights standards, processes for ensuring that these standards are achieved across all properties, and effective processes for remediation in cases of rights violations.

1. Require all partner hotels to affirmatively demonstrate compliance with international labour standards, especially in high-risk areas, and require hotel partners prepare and fund responsible workforce downsizing plans and practices. FIFA partners should be encouraged to undertake regionally informed approaches to identifying and remediating discrimination, wage theft, understaffing and overwork, workplace violence and harassment and occupational safety and health.
2. Contribute to emergency funds, and require contributions from subcontractors, that are sufficient to ensure provision of owed wages, severance pay, relocation costs health insurance, and on-site emergency health care.

204 We refer to hotels whose services are or have been offered for sale at hospitality.fifa.com as part of the FIFA Official Hospitality Programme by “FIFA World Cup Qatar 2022 hotels” or “FIFA World Cup hospitality partners” and similar language.

3. Establish health standards for workplaces and employer-provided housing, including robust COVID-19 protocols to manage potential future outbreaks, measures to ensure that workers are not pressured to risk their health to keep their jobs and systems that secure high-quality medical care to all workers who do fall sick on the job.
4. Address regional risk factors and draw from good practices in the region in developing effective protocols and practices to protect workers’ rights consistent with international conventions and standards.
 - A Processes for identifying and remediating wage discrimination, wage theft, understaffing and overwork, workplace violence and harassment, and health and safety risks
 - B Responsible workforce downsizing plans and practices
 - C Engagement with migrant workers in a manner that enables workers to share their concerns while protecting workers’ privacy and safeguarding workers from retaliation

B. Call for Immediate Action and Long-term Reform from Qatar Government

1. Call on the Qatar government to address the range of rights violations facing migrant workers in inspections, during and after the FIFA World Cup Qatar 2022.

FIFA’s local partner for delivery of the Qatar World Cup infrastructure, planning and operations, the Supreme Committee for Delivery and Legacy has been actively auditing the hospitality sector. A Kenyan worker employed at Souq Al Wakrah Boutique Hotel—a FIFA partner hotel groups—described regular government inspections:

They come frequently and unexpectedly without being identified as government officials until they have left. They will come and look at the rooms, the services offered, and working conditions and then leave.²⁰⁵

As they continue to undertake planned hotel inspections, the Qatar Supreme Committee for Delivery and Legacy has a critical role to play in ensuring labour and human rights standards are enforced. They should ensure that planned labour rights inspections include the following:

2. Call on Qatar to commit to recognizing the rights to freedom of association and to join or form a trade union irrespective of nationality, identity or background

The persistent discrimination and rights violations documented here cannot be ended without action by the state of Qatar to enshrine the fundamental rights to associate, organise, and bargain collectively. These rights are the cornerstone on which real reform must rest. Through freedom of association, workers may identify common goals and create an organisation capable of pursuing them, bringing worker power to bear on a consistent basis to transform workplace relationships. Fully protected and empowered workers’ organisations provide a worker-led platform for advocating for internationally recognised workers’ rights, securing their enforcement, and remaking workplaces marred by the products of power imbalances - discrimination, abuse, and other workers’ rights violations.

Qatar’s recent work on joint labour management committees with the ILO represents a first step towards recognising the power of workplace cooperation, but recognition of workers’ fundamental right to associate remains distant. Absent substantial reforms to protect the independence and empower

205 A Kenyan worker employed at Souq Al Wakrah Boutique Hotel, Doha, Qatar. Interviewed in June 2022.

workers’ organisations, these cooperative efforts threaten management subversion of workers’ organisations. They do not provide the protections from anti-union discrimination, among other employer actions, that workers need to exercise their full freedom of association.

FIFA should call on the State of Qatar to extend its leadership in the region by recognising and implementing the rights to associate, organise, and bargain as defined by the ILO.

3. Call on the Qatar authorities to support the establishment of a genuinely independent Migrant Worker Centre

Given the extreme power imbalances between migrant workers and employers in Qatar, migrant workers are at significant risk for discrimination and exploitation.

The nationality-based racial hierarchies in Qatar, moreover, are entrenched by policies that deny migrant workers paths to long-term residency or permanent citizenship.

In this context, migrant workers require forums for collective action to safeguard their rights and promote their interests. Establishing a genuinely independent Migrant Worker Centre in Qatar is a key first step towards advancing freedom of association and creating a modern, rights-respecting labour system in Qatar.

Given the extreme power imbalances between migrant workers and employers in Qatar, migrants face significant risk factors for discrimination and exploitation. The nationality-based racial hierarchies in Qatar, moreover, are entrenched by denying migrant workers a path to long term residency or citizenship.

II. Recommendations for FIFA to Improve its Track Record on Human Rights Beyond the World Cup Qatar 2022

Include detailed guidelines for all sectors engaged in providing World Cup services, including but not limited to the hospitality sector.

- 1.** Looking past 2022, we call on FIFA to be consistent with September 2018 recommendations from the FIFA Human Rights Advisory Board, issue sector-specific guidelines and procedures for enforcing labour and human rights standards across all sectors engaged in providing World Cup services, including but not limited to the hotel sector.
- 2.** Issue guidelines to address nationality-and gender-based discrimination, wage theft, understaffing and overwork, workplace violence and harassment, health and safety risks, and sudden loss of employment.

III. Guidance for Qualifying Teams and Spectators in Selecting Hotels at FIFA World Cup Qatar 2022

Reports documenting human rights violations against migrant workers in Qatar have put football teams on high alert, with players from teams including Germany, the Netherlands, and Norway protesting against human rights abuses. As qualifying teams and spectators select their hotels for the FIFA World Cup Qatar 2022, they have an opportunity to improve working conditions for migrant workers in the hotel sector.

1. As you select your hotel for the FIFA World Cup Qatar 2022, let hotels you consider know that their human and labour rights track record is important to you in determining where you will stay.
2. Before making your booking, check whether the hotel takes adequate measures to safeguard the rights of migrant workers.
3. After making your booking, check whether the hotel is enforcing measures to safeguard the rights of migrant workers.

Questions to ask the hotel prior to and after booking

Wages	<ul style="list-style-type: none"> • Do you have transparent salary grades that determine wages based on objective criteria, including responsibilities, skills, and experience? • Are all of your workers paid in full on a timely basis, including for overtime hours worked? • Can you produce proof that all of your workers are paid in full in a timely manner through WPS documentation of wage transfers?
Hours	<ul style="list-style-type: none"> • How many hours a day do employees work? • How many breaks are they given, and how long are break times? • Do employees have a choice on whether or not to work overtime? • Do you pay workers for any overtime hours they work?
Occupational health and safety	<ul style="list-style-type: none"> • What measures do you have in place to safeguard employees from contracting COVID-19? • Do you provide health insurance for all of your employees? • Do all of your employees have access to medical care and paid sick leave? • What are your emergency health protocols in case a worker becomes sick or is injured at work?
Living conditions	<ul style="list-style-type: none"> • Does your hotel provide workers with accommodation? • If yes, how many workers share a room? • What measures do you have in place at worker accommodation sites to safeguard workers from the spread of COVID-19 in the instance of another outbreak?

Hotel Responses



Accor

Hotel Fairmont Bab Al Bahr, Abu Dhabi, UAE

1. Non-payment or underpayment of wages

An Indian worker employed as a steward at this hotel explained his decision to return home based on a hotel practice of requiring employees to work without pay. He told Equidem,

“After the lockdown, the hotel asked us to work without pay until December in return for accommodation, or we could apply for extended unpaid leave. I could not stay without pay. I have family commitments. The company did not give us notice. Workers who resigned got their service entitlement.”

The stewarding services stewarding at Fairmont Bab Al Bahr employs both hotel team members and employees from an outsourced company. Only 10 stewarding team members are directly employed by Fairmont Bab Al Bahr. During the pandemic, we can confirm the hotel never closed and the stewarding department remained in operation. The hotel did place the outsourced stewarding contract on hold for a period of time, as the hotel’s own stewarding team was enough to handle the volume of business. We can confirm these team members received their pay during the pandemic and to date. The management team never asked any team members to work without pay.

As per the hotel’s records from April 2020 to date, only 4 resignations have been recorded in the Stewarding Department. Three of these resignations were from Nepalese Citizens and only one from an Indian team member at a Supervisory level, who recently resigned for a promotion opportunity in Dubai effective May 15 2022. Thus, there are no records of another employee from India leaving employment and returning home between January 2020 and today.

The wages in the Emirate of Abu Dhabi are monitored and controlled by the authorities through the Ministry of Human Resources and Emiratization, we can confirm no violation has ever been received by the hotel due to non-payment of wages.

2. Abrupt termination

Workers at this hotel reported that after the pandemic spread, the hotel closed and more than 160 workers suddenly lost their jobs.

We can confirm Fairmont Bab Al Bahr never closed and no redundancies were made due to the pandemic.

Mövenpick Hotel West Bay Doha, Qatar

1. Occupational safety and health

A Bangladeshi airport services worker at the Mövenpick Hotel West Bay in Doha, Qatar—a FIFA World Cup Qatar 2022 partner hotel—described pressure from management to work against his will, exposing himself and other workers to COVID-19 prior to vaccines being released on the global market.

“The [Qatari] government booked the whole hotel for COVID-19 patients. Management offered us work with salary. If we refused to work, we still received food and accommodation, but no salary. Many of us refused to work. Then we received pressure from management to work.”

Starting from March 16 March 2020 until 12 December 2020:

Mövenpick Hotel West Bay Doha was exclusively part of Quarantine and Welcome Home program as partner with MOPH (Ministry of Public Health).

Unfortunately, roles were impacted due to the change of clientele during this period and the management team of Mövenpick Hotel West Bay Doha gave their team members the option to report to duty with salary or to stay at accommodation on local leave until they finished their paid vacation balance, then unpaid vacation. This option was provided to team members whom were impacted in order to avoid making the roles redundant.

Employees choosing to work in the hotel:

All team members received full precaution training from Hamad Medical Corporation (HMC) team trainers, and they were working with the full precautions’ measures under HMC 24/7 observation. For more protection, teams working on floors, were isolated and were staying in the Hotel. In case an employee unfortunately was infected, an isolation area in the Hotel or an isolation center, as advised by HMC, and were given a fully paid sick leave. HMC Medical team was doing swab test on a regular basis.

Employees who chose the option not to work and remain in the accommodation:

To support them, the management team gave them the option to take local vacation and advanced Public Holidays to support them with Income. Accommodation and 3 daily meals were providing to their rooms on daily basis. Ramadan Iftar and Sohour were delivered as open buffet with all precaution measures and social distancing and under daily observation of HR department.

2. Access to health services.

A Bangladeshi airport services worker employed in the Mövenpick Hotel West Bay Doha in Qatar — a FIFA World Cup Qatar 2022 hotel partner — explained:

“As migrant workers, we have had problems accessing medical care for general illness. Access to hospitals was

a problem because most hospitals only accepted serious cases during COVID- 19. [Qatari] national and western people were given priority in accessing hospitals.”

- All Mövenpick employees were provided with all safety protocol and protection information and had the support from the Hamad Medical Corporation team who were located in the hotel 24/7 during the quarantine period.
- During the pandemic, the hotel did not receive a complaint from any team member about facing challenge with accessing health care or health centres.
- If an team member felt unwell, the Management team advised to call 911 immediately.
- In addition, the Management gave the option to go to Hamad Hospital for any emergency, or private hospital if it was required and costs were reimbursed (for example, to the Al Safa clinic).

With that background, we specifically would like to know whether Accor is aware of the particular issues noted in this letter; whether any steps have been taken to address these specific issues; and whether Accor is aware of other, similar human and labour rights issues at these hotels and other Accor hotels in the region.

Neither these two hotels, nor Accor in the region, were made aware of the issues raised in this letter prior to receiving the email. There are no records of similar labour rights issues reported in the region during this period.

Thank you

Sarah Fernandez
Director PR & Communications
India, Middle East, Africa & Turkey

IHG

To whom it may concern:

Thank you for your letter regarding the research that Equidem and Global Labor Justice – International Labor Rights Forum (GLJ-ILRF) carried out between February 2020 and June 2022 regarding working conditions for migrant workers employed at hotels ahead of the FIFA World Cup Qatar 2022.

We note that you have explained that due to a technical error on your side we were not originally contacted as part of your outreach to hospitality companies as mentioned in your research. However, on becoming aware of your report we reached out to you to obtain further information and are now in progress of carrying out a review into the matters raised in your research.

At IHG Hotels & Resorts, we are committed to conducting business responsibly, including respecting labour and human rights. We take all reports concerning labour and human rights issues within our hotels and supply chains seriously and are committed to ongoing human rights due diligence. As a global leader in the hospitality and tourism sector, we strongly believe that we have an opportunity to affect positive change, which includes the advancement of human rights through our business activities. In line with this, we are reviewing all of the items identified in your report.

We note the following regarding our policies and approach to the risk areas identified in the locations covered in your research. In addition, we have provided information on our review so far into the specific concerns raised although noting that in some cases this is still in progress.

Covid impacts:

The global Covid-19 pandemic created unprecedented circumstances for the hospitality industry. Travel around the world significantly slowed or, in many places stopped, which led to a

number of IHG-branded hotels closing temporarily or significantly reducing operations. This in turn had a corresponding impact on the employment of colleagues. The closures and reduced operations led to some redundancies, although colleagues have been and continue to be re-hired as travels returns and hotel operations are scaled up again.

Redundancies were carried out in accordance with local labour laws. In a number of hotels, employees who were made redundant opted to remain in staff living accommodation with free food and medical assistance until they found new employment and/or decided to return to their home countries. Where employees decided to return home, hotels funded the cost of repatriation. Hotels also supported the re-deployment of former hotel employees into other work opportunities. To preserve as many jobs as possible, in some locations, a number of employees entered into unpaid leave agreements for limited periods of time as an alternative to redundancy. These employees continued to be provided with accommodation, meals and medical assistance during their periods of unpaid leave and continued to be paid in accordance with the number of days they worked, including any applicable overtime.

Hotels follow IHG guidance on health and safety measures related to Covid-19, as well as local government guidance. IHG’s global Covid safety guidance covers topics including cleaning and disinfecting procedures, use of Covid-19 protective equipment, and Covid-19 infection control hotel risk assessment and procedures. Guidance was also applied to staff living accommodation, and examples of changes undertaken during the pandemic include regular deep-cleaning and disinfection of staff living accommodation in accordance with enhanced Covid-19 protocols; segregation of any suspected cases; facilitation of social distancing; reduced seating capacity and use of floor markers in common areas; limits on shuttle bus capacity; and increased communication and

awareness to workers such as posters, notices and staff forums.

Discrimination and Harassment:

IHG does not tolerate any form of discrimination, harassment or bullying in the workplace, whether it be from a colleague, guest or anyone else. Employees are encouraged to report any concerns to supervisors or hotel management so they can be addressed, and IHG maintains a confidential reporting hotline where employees can report any such concerns. Our Code of Conduct and training sets out our expectation for managers to create an environment where colleagues feel able to raise issues and concerns and to always follow up when these are raised. Where concerns are raised, they are promptly investigated.

IHG is also committed to providing equality of opportunity without discrimination. Hotels follow the local labour laws and in addition IHG pay/salary tools, which are developed using external benchmarking and annual salary survey information, are used to help set salary levels for different roles.

Recruitment fees:

Our human rights policy clearly sets out that no worker should pay for a job and that fees and costs associated with obtaining employment should not be paid by workers. We have guidance and training for hotels on this topic, including covering carrying out interviews with workers to help check if fees or costs have been paid during the recruitment process. We continue to develop policies, processes and requirements for hotels to help better understand and address this risk area. This ongoing work includes due diligence to understand where potential issues may occur as well obtaining input from external organisations to better understand the recruitment journeys of migrant workers and the types of fees and costs they may incur to help continually improve and update our guidance and training for hotels.

Overtime:

All IHG-branded hotels are required to comply with applicable laws and regulations regarding compensation and overtime.

Labour providers:

IHG’s Supplier Code of Conduct sets out our expectations for suppliers including related to human and labour rights. Suppliers are required to comply with all applicable laws and regulations including those concerning hours, compensation, opportunity and working conditions. Where concerns are identified, we aim to work with suppliers to resolve any issues, however material breaches may lead to termination of the contract with the supplier. Hotels are provided with guidance and training on carrying out due diligence on labour providers.

Reporting concerns:

As noted above, we encourage colleagues to report any concerns or issues directly to their line manager, supervisor, local Human Resources representative or to another appropriate local manager. However, for certain matters, we recognise colleagues may feel more comfortable raising matters confidentially to IHG and in these instances, a confidential report can be filed through the IHG Confidential Reporting Hotline. This is an independent, confidential channel via the telephone or internet which can be used by our colleagues and any person with a relationship to IHG, including suppliers and their workers, to speak up and report concerns anonymously in their native language.

IHG does not permit retaliation against employees or workers employed by contractors making good faith reports of suspected breaches of the IHG Code of Conduct or IHG policies, even if it may result in a loss of business to IHG. We raise awareness of the confidential reporting line via our Code of Conduct and training, and hotels also raise awareness of the reporting line via posters on notice boards, during meetings/ briefings, etc. Further details on how to

access the Confidential Reporting Hotline can be found at: <http://www.ihgethics.com/>

As explained above our review is still in progress however, below we have provided responses to a number of the items mentioned in your letter to us based on our review so far.

InterContinental Hotel, West Bay, Doha, Qatar:

As noted above we have clear policies that workers should not pay recruitment fees. We have requested further information from you to help identify whether the allegation concerns a particular company to enable us to investigate this further. With respect to the concern regarding harassment from guests, we are pleased that your research found that colleagues felt comfortable to report incidents to supervisors and that these were addressed. We understand this is an important issue and will continue to assess possible additional measures and resources.

Crowne Plaza, The Business Park, Doha, Qatar:

As noted above we have clear policies that workers should not pay recruitment fees. We have requested further information from you to help identify whether the allegation concerns a particular company to enable us to investigate this further. Regarding unpaid leave during the pandemic, as described above, in order to preserve as many jobs as possible, a number of employees entered into unpaid leave agreements for limited periods of time, proportionate to departmental business needs. Employees’ pay continued proportionate to the hours worked, including any applicable overtime and accommodation, meals and medical assistance continued to be provided.

Crowne Plaza West Bay, Doha, Qatar:

We are sorry to hear that a colleague at this hotel did not feel comfortable reporting issues to their

supervisors. While we encourage colleagues to report concerns to their supervisor or to local management or HR, we recognise that in some cases colleagues do not feel comfortable to do this. In these cases, concerns can be raised to IHG via our confidential hotline described above and this can be done anonymously. We continue to assess how to ensure colleagues are aware of the hotline and do this in various ways including displaying posters and through training.

InterContinental Dubai – Festival City, UAE:

Regarding the concern raised related to housing, we have requested further information from you regarding the provider of the accommodation to enable us to investigate this concern further.

As stated above, we take all reports concerning labour and human rights issues within our hotels and supply chains seriously, and we encourage third parties, including media channels, civil society organisations and others, to contact us directly with any concerns, either via our confidential reporting channel (ihgethics.com) or via the Ethics and Compliance team’s email address (ethicsandcompliance@ihg.com).

For more information on our approach to labour and human rights risks please see our Modern Slavery Statement which includes information on our work in this area including collaborative projects we have engaged on. Our Modern Slavery Statement can be found here: [IHG Modern Slavery Statement](#)

We appreciate Equidem’s raising these issues with us directly. We take seriously our commitment to operating responsibly and respecting human rights, and are continuing to review and address as appropriate the identified issues.

Kind regards,

IHG Hotels & Resorts

Marriott

To whom it may concern:

Thank you for your email to Marriott International dated 15 July 2022, regarding working conditions for migrant workers in advance of the 2022 World Cup. We have also been closely monitoring the situation and continuing to support human rights efforts in the region.

As stated in our [Human Rights Policy](#), Marriott International acknowledges and respects the principles contained in the United Nations Universal Declaration of Human Rights. We are committed to conducting our business in a manner consistent with these principles and the United Nations Guiding Principles on Business and Human Rights and to respecting human rights.

Marriott supports and upholds the elimination of discriminatory practices with respect to all aspects of employment and promotes diversity and inclusion within its business operations. As stated in our [Supplier Guidelines](#), Marriott also expects suppliers to prevent discrimination and promote an inclusive environment that fosters mutual respect, diversity, inclusion and equal opportunity with employees and other stakeholders.

The travel industry has been impacted in unprecedented ways by the COVID-19 pandemic. At the property level and in our corporate offices, reducing staff and salaries were some of the many proactive steps Marriott took to mitigate the negative financial and operational impacts of the pandemic. All termination packages were at least in line with government requirements, and Marriott aims to rehire associates who were terminated due to the COVID-19 pandemic, where possible, as the industry opens up again.

In response to the allegations raised by Equidem and GLJ-ILRF, we consulted with General Managers and Directors of Human Resources, reviewed salary and payroll data, and reviewed unpaid leave documents and found the following:

- At the **Westin Hotel, Doha**, all associates receive the same pay rate for the same roles, regardless of nationality. The vast majority of expat employees are recruited directly by the hotel team; in all cases, fair salaries and detailed job descriptions are agreed by both sides before they travel to Qatar.
- At the **Courtyard by Marriott, Kuwait City**, no associates were required to sign documents confirming they had received salary while they were on unpaid leave; they signed a Notice of Agreement of Unpaid Leave, which stated that the associate agreed to unpaid leave during the unprecedented Covid period and to confirm that Marriott continued to provide accommodation, medical insurance, meals, and schooling allowances (where appropriate). In the banqueting department, all waiters start at the same pay rate, regardless of nationality.
- At the **JW Marriott Hotel, Kuwait City**, all associates in entry-level positions start at the same pay rate, regardless of nationality or gender. Better qualified and more experienced associates are hired at higher positions and offered higher pay rates, accordingly. In 2020, 30 associates were terminated due to pandemic and 205 associates due to the complete closure of the hotel for a comprehensive multi-year renovation. The process followed for all redundancies was in line with Kuwait labor law and government regulations, and all associates were paid for three months and offered benefits, such as indemnity, repatriation or visa transfer.

- The **Marriott Resort Palm Jumeirah, Dubai** is currently in a pre-opening stage and did not have any associates employed during the indicated period.

Marriott provides associates with a variety of means, including anonymous channels, to report unethical behavior harassment, discrimination, and other human rights concerns. We require a prompt and thorough investigation of complaints, and we do not tolerate any retaliation toward individuals who have raised such concerns in good faith. None of the allegations raised by Equidem and GLJ-ILRF were reported through these channels.



We take our commitment to respect and uphold human rights seriously, and we appreciate you raising awareness of this important matter. Thank you again for your outreach and the opportunity to respond.

Sincerely,

Abbe Horswill



equidem

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