



Date: 22 February 2022

SC-CMC-LET-AMN-22-00873

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Subject: Response to letter relating to research on [REDACTED]

[REDACTED] and [REDACTED]

We refer to your letter dated 14 February 2022, seeking information regarding the Supreme Committee for Delivery & Legacy's (SC) engagement with [REDACTED] and [REDACTED] as well as our wider plans on due diligence related to provisions of services including the security sector for the FIFA World Cup Qatar 2022™.

As you are aware, the [SC's Workers' Welfare Standards \(WWS\)](#) are fundamental to the Workers' Welfare programme and contain three key pillars covering ethical recruitment, accommodation and the work environment.

The WWS are targeted at all workers across SC projects and are designed to protect their health, safety and welfare, and to ensure they are treated with the utmost dignity and respect. Most critically, the WWS are contractually-binding on all SC contractors.

The SC diligently monitors and enforces these standards through a robust four-tier auditing system. This involves self-audits by contractors and audits by the SC's Workers' Welfare Department (WWD), followed by independent audits by an external monitor, appointed by the SC. Additionally, contractors may be subject to inspections by the Ministry of Labour (MoL).

The WWD has also introduced a pre-approval mobilisation mechanism to assess sub-contractors, prior to their deployment on site. This has helped achieve stronger compliance and enforcement of the standards on the SC's projects.

We also have strong enforcement measures in place to prevent companies from bypassing the WWS, which include payment suspension and contract termination, reporting to the MoL, blacklisting from current and future SC projects and rectification by the contractors at their own cost.

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Prior to contract execution, the SC ensures that: contractors provide a signed commitment letter to adhere to the WWS; provide compliant accommodation for workers; and are meeting the SC's ethical recruitment requirements.

In the case of ██████ we can confirm the following:

- ██████ was employed as a subcontractor on SC projects until Q3 2019 and no critical non-compliances were noted. The SC also entered into a call-off agreement with ██████ on 29 December 2019 for the provision of security services for various upcoming events, i.e. after the FIFA Club World Cup 2019™. This agreement was effective until December 2021.
- Their services were utilised for the FIFA Club World Cup 2020™, however due to the issues identified during worker interviews at the event and subsequent audits and inspections, the SC recommended to all relevant stakeholders that the services of ██████ should be discontinued.
- Following the FIFA Club World Cup 2020™, the SC did not utilise the services of ██████ due to their lack of commitment in rectifying the non-compliances identified throughout the course of our audits and inspections.
- Subsequent to the workers' strike on ██████, the WWD conducted further audits and inspections, through which a range of issues were noted, such as excessive overtime, no rest days, non-compliant accommodation, lack of awareness of grievance mechanisms, passport retention, and no provision of health cards and non-submission of documents to verify payroll and entitlements. Similar issues were also reported by our external monitor Impactt during their audit in Q1 2022.
- Since May 2021, the SC has been constantly engaging with the ██████ to rectify issues and increase compliance levels. However, ██████ has not demonstrated any improvements, and issues remain outstanding.
- The SC has therefore taken a range of punitive measures against ██████ including:
 - Ensuring that the ██████ was not engaged in any capacity during FIFA Arab Cup 2021™.
 - Ensuring that the ██████ will not be engaged in any capacity for the FIFA World Cup Qatar 2022™, unless they exhibit to SC's satisfaction, that there has been significant improvements.
 - Communicating to various relevant stakeholders to not engage ██████ for any future events and projects until there is significant improvement.
 - No renewal of their call-off agreement after its expiry.
 - Reporting ██████ to MoL on 18 February 2021 and 12 July 2021, where they subsequently were blocked.
 - Being placed on SC's watch-list to avoid any future mobilisation on SC projects.
 - Reporting ██████ to ██████ management for further action considering their non-compliances in accordance with contractual mechanisms, since the contract for security services for ██████ is not directly with the SC.

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In the case of [REDACTED], we can confirm the following:

- [REDACTED] was deployed as a sub-contractor from February 2016 to August 2020 on an SC project and no significant issues were raised while they were mobilised on the project. Prior to mobilisation, [REDACTED] signed contracts which explicitly included clauses that stipulated an obligation to comply with the SC's WWS.
- Following its demobilisation in August 2020, [REDACTED] housed staff in non-compliant accommodation. Therefore, they have been excluded from bidding on World Cup-related projects until they have rectified the various critical workers' welfare non-compliances.
- [REDACTED] had a call-off agreement with the SC for the provision of security services from December 2019 until December 2021. The WWD audited [REDACTED] as part of the call-off agreement and reported them to MoL for further investigation and punitive actions.
- [REDACTED] was disqualified from the tender for the FIFA Arab Cup 2021™ based on the recommendation of the WWD, due to outstanding critical non-compliances.

In the case of [REDACTED], we can confirm the following:

- [REDACTED] has an agreement with the SC to provide security services across all eight stadiums and SC training sites. As with every agreement, [REDACTED] have signed contracts which explicitly include clauses that stipulate an obligation to comply with the SC's WWS.
- They have demonstrated reasonable levels of compliance throughout their engagement with the SC and therefore will continue to be deployed as long as they comply with the WWS.
- [REDACTED] may also be considered for additional call-off services during the World Cup, subject to fulfilling SC's tender requirements.
- [REDACTED] undergoes audits and inspections on a quarterly-basis, whereby compliance is carefully monitored by the WWD. [REDACTED] is required to submit and implement rectification plans where non-compliances are identified. Some key rectifications which [REDACTED] have undertaken include:
 - relocating their entire workforce to SC-compliant accommodation sites; and
 - reimbursing recruitment fees to SC workers through monthly instalments.
- [REDACTED] was also deployed during FIFA Club World Cup 2020™, FIFA Arab Cup 2021™ Qualifiers and FIFA Arab Cup 2021™.
- During FIFA Club World Cup 2020™ and FIFA Arab Cup 2021™, non-compliances related to passport retention and excessive working hours were noted and reported to MoL during February 2021 and December 2021 for further action.

The SC takes every measure possible to ensure that workers on our projects are protected and their rights are upheld. Since embarking on the Workers' Welfare programme, the SC has developed a very close working relationship with the MoL, and this engagement is a key part of the WWD's enforcement measures. To date, as a result of the findings of WWD inspections, 391 contractors have been reported to MoL, with 50 blocked by MoL from being deployed, 56 demobilised from an SC project, 226 placed on the watch list and 7 blacklisted. We encourage workers who are facing ongoing challenges with their employers to reach out to the MoL who have a series of measures in place to protect workers. Workers' are also

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encouraged to utilise the SC's grievance platforms, including Workers' Welfare Forums and the grievance hotline to raise issues on any welfare matters.

As for the SC, in the current and future term, any contractor deployed at any World Cup-related site, including Team Base Camp hotels, will be subject to workers' welfare due diligence and compliance with the WWS.

We trust the above information addresses the queries raised in your letter.

Supreme Committee for Delivery & Legacy

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Date: 21 March 2022

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Subject: Response to letter related to private security companies

We refer to your letter dated 14 March 2022, related to the issues faced by workers in private security companies. The SC has already provided extensive information related to its engagement with the three companies (■■■■, ■■■■ and ■■■■) in our letter (Ref: SC-CMC-LET-AMN-22-00873).

As you are aware, the SC's Workers' Welfare Standards (WWS) are fundamental to the Workers' Welfare programme and are enforced through a robust compliance and audit system. The SC strives to engage with highly compliant contractors. To ensure this, the SC's Workers' Welfare Department (WWD) conducts due diligence at two stages: The first stage includes pre-mobilisation due diligence encompassing tender evaluations of main contractors, which includes obtaining signed commitment letters requiring contractors to acknowledge and adhere to the WWS; confirming that the nominated accommodation is compliant with the WWS; and ensuring compliance with the SC's ethical recruitment requirements. The second stage of the process includes a pre-mobilisation approval process of their sub-contractors. If human rights risks are identified during the tender evaluation, the contractor is rejected.

Ongoing due diligence includes quarterly audits and inspections of contractors covering ethical recruitment, accommodation and working conditions. This system allows the SC to monitor compliance of contractors on an ongoing basis in order to confirm that they adhere to the WWS on the SC programme. When issues are identified, the SC works diligently to ensure quick resolution and mitigate any negative impact on workers.

As stated in our previous response, the SC conducted due diligence of the three companies prior to contracting them. Specific to ■■■■, as part of the audit cycle, a range of non-compliances were identified, including excessive working hours, overtime short-payment, unauthorised deductions, no food allowance, recruitment fees and lack of employment contracts. Following repeated failed attempts to move ■■■■ to resolve the issues, the SC ultimately reported ■■■■ to the Ministry of Labour (MoL) for further investigation and punitive action.

The SC makes every effort to support contractors in implementing rectification plans. However, when issues remain outstanding, despite repeated follow-ups and due to a lack of commitment

from contractors, the SC takes stringent actions such as placing the contractor on a watch-list or black list and liaising with MoL to block defaulting contractors.

On the topic of recruitment fees, the SC can confirm that ■ workers on the SC projects are benefitting from the SC's Universal Reimbursement Scheme, with the contractor having committed to pay their workers QAR 125 each for 24 months (in addition to their salaries). The scheme was introduced in 2017 to transfer the burden of proof from the employee on to the employer, requiring contractors to prove they hired their workers ethically. As a result, 266 contractors have voluntarily agreed to reimburse approximately QAR 103.95 M (EUR 25.87 M) to 49,286 SC and non-SC workers over a 36-month period. QAR 83.02 M (EUR 20.66 M) has been reimbursed to date.

While the SC's auditing system encompasses worker interviews, additional grievance platforms have been introduced to encourage workers to raise issues on any welfare matters. This includes a dedicated grievance hotline where workers can report issues anonymously. If any of the cases you have identified as part of your research, pertain to SC workers, Amnesty International is requested to encourage these workers to use the SC grievance hotline. Workers that are not on SC projects and are facing ongoing challenges with their employers, are encouraged to reach out to the MoL, who have a variety of remediation measures in place to protect workers.

As you can appreciate, a programme of the scale of the SC's, which is unique even from an international perspective, will always have contractors who will try to bypass the system, irrespective of regulations or monitoring systems. We are steadfastly committed to addressing and rectifying such breaches through our enforcement mechanisms, and where appropriate, in collaboration with contractors and stakeholders.

The SC's journey is ongoing, and the SC has always been open and transparent with the challenges it has faced. The SC reports annually on non-compliances through its own monitoring, as well as through its independent external monitor, Impactt.

The FIFA test events held in the past years have enabled the SC to further test its systems and enhance its monitoring strategies. Lessons learned from these experiences have been crucial in informing the operational approach for FIFA World Cup 2022. The WWD has already initiated a comprehensive pre-event due diligence exercise on the companies to be mobilised for the FIFA World Cup, and this exercise will continue until the contracting process for the tournament is complete. The exercise includes tender evaluations for main contractors and the pre-mobilisation approval process for sub-contractors prior to their deployment (as described above). All companies, regardless of having been previously contracted or not, will be audited and inspected to ensure compliance with the Qatar Labour Law and WWS.

We trust the above information, together with our previous responses, provide the necessary context to clarify your questions. We hope that the SC's efforts are appropriately reflected and recognised in your report.

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