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Head of Economic and Social Justice
Amnesty International
London, UK

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Coj/agr

FIFA World Cup Qatar 2022™ and labour rights due diligence of service providers

Dear Stephen,

Thank you for your letters dated 14 February 2022 and 2 September 2021 regarding service providers involved in FIFA competitions hosted in Qatar.

Let me start by reiterating FIFA's steadfast commitment to respecting human rights across its operations in accordance with FIFA's Human Rights Policy and responsibility under the UN Guiding Principles on Business and Human Rights. With respect to the FIFA World Cup Qatar 2022, the initiatives to meet these commitments are outlined in the joint Sustainability Strategy for the FIFA World Cup Qatar 2022 (see [here](#)). The strategy includes initiatives by FIFA and the host country to ensure the application of the Supreme Committee's Workers' Welfare Standards for workers engaged in the provision of services for official FIFA World Cup sites (see also [here](#)).

With the scale of construction of FIFA World Cup stadiums and training sides gradually decreasing and a growing focus on event-time preparation, our workers' welfare-related efforts have for the past two years increasingly shifted towards service companies too. This has involved the development of an audit and inspection programme for the hospitality sector as well as due diligence measures for service companies deployed on FIFA competition sites. Such programmes were also implemented during the FIFA Arab Cup 2021 and the FIFA Club World Cup 2020.

These programmes build on the experiences of the SC's Workers' Welfare Department on construction sites over recent years and are being implemented in close collaboration between FIFA, the FIFA World Cup Qatar 2022 LLC (Q22), as well as the Supreme Committee for Delivery & Legacy (SC) and other host country counterparts. They also leverage the SC's existing collaborations with the international trade union for construction workers, Building and Woodworkers' International (BWI), the International Labour Organisation (ILO), the Ministry of Labour, as well as the independent auditor Impactt Ltd.

Please kindly find the below answers to the questions raised in your letters. This information shall also be read in conjunction with the more specific information provided separately by the SC on the three private security companies your refer to in these correspondences.

We trust that these combined documents provide useful background to your research and we look forward to meeting in the coming weeks to further discuss these measures and any remaining questions you may have.

With kind regards,



Joyce Cook
Chief Social Responsibility & Education Officer

Feedback on Amnesty International questions with respect to labour rights due diligence of service companies involved in FIFA competitions in Qatar

a) Overall due diligence processes in relation to service companies

Objective H1 of the Sustainability Strategy for the FIFA World Cup Qatar 2022 states that FIFA and the host country aim at ensuring decent working and living conditions and fair recruitment of workers engaged in the provision of services for FIFA World Cup sites. This includes services such as transportation, hospitality, cleaning, or security, which are contracted by either of the entities involved in the tournament delivery, i.e. FIFA, Q22, or host country entities such as the SC.

Since 2014, FIFA has been engaging with the SC on its Workers' Welfare programme for construction sites, which includes joint inspections with BWI and oversight by the independent monitor Impactt Ltd. (see [here](#) for detailed reports in that respect). This programme is based on ensuring compliance with the SC's Workers' Welfare Standards and includes pre-contract due diligence, regular audits and inspections of companies contracted, as well as compliance and enforcement efforts in collaboration with the Ministry of Labour.

The same system of pre-and post-contracting audits and enforcement is also being used for companies providing services for FIFA competitions hosted in Qatar. To ensure a robust and consistent system across the three entities FIFA, Q22 and SC, a new workers' welfare unit has been established at Q22 in 2021. This unit is managed by the leadership team of the pre-existing SC Workers' Welfare Department and is further staffed with a group of FIFA-provided expert auditors. The Q22 Workers' Welfare unit also works in close collaboration with all relevant functional areas at FIFA and Q22 to ensure labour rights compliance is embedded across all areas of tournament organisation.



The programme is based on contractual clauses requiring companies contracted by FIFA, Q22 or the SC to comply with the SC's Workers' Welfare Standards and Qatari Labour Law, and allowing the tournament organisers to implement their monitoring and enforcement programmes. As an additional measure, the scope of the SC's Worker Welfare hotline is expanded to workers employed by service companies contracted by the SC, Q22 or FIFA.

As with any such effort, these systems are subject to constant review and enhancement to meet the challenges of an event at the scale of a FIFA World Cup. In that respect, the programme is subject to the ongoing monitoring of Impactt Ltd as part of its collaboration with the SC. Impactt Ltd conducts its own independent monitoring of contractors and provides recommendations to the SC and Q22 on how to further strengthen the systems in place. As is the case with Impactt Ltd's ongoing work in relation to construction sites, detailed reports will be published also on their findings in relation to service companies.

b) Labour rights programme for hospitality sector

The hospitality sector is key for the successful delivery of any FIFA World Cup. In that respect, FIFA, Q22 and the SC are contracting a significant number of hotels that will be used by participating teams, sponsors, broadcasters and other partners. The SC, Q22 and FIFA have therefore been involved in various efforts to enhance labour rights compliance in that sector.

In a first phase, the SC and Q22 provided input into a sector-wide process that led to the development of a sectoral guidance tool for hotels in Qatar. This process was led by the Ministry of Labour, the International Labour Organization (ILO), and the Institute for Human Rights and Business (IHRB). The tool was launched in September 2020 and has included awareness raising and engagement with a sizable group of hotels in Qatar (see [here](#)).

With an increasing number of hotels being contracted by the SC, FIFA and Q22 for FIFA competitions, the audit and inspection programme for the hospitality sector started with initial pilots in 2019 and this has been expanded since. The programme is intended to include the auditing of more than 150 hotels including their sub-contractors, and we aim to conduct a minimum of three audits for all official FIFA World Cup hotels ahead of the start of the competition. To date, we have seen a clear commitment from hotels to further enhance their labour rights systems and to ensure compliance with the SC's Workers' Welfare Standards.

The hospitality programme includes a collaboration with the ILO, which supports FIFA World Cup hotels in implementing worker committees. This collaboration includes, in particular, the training of worker and company representatives to ensure structured and effective integration of worker perspectives in the labour rights systems by companies. Furthermore, FIFA, Q22 and the SC are supporting sponsors and participating football associations in their own due diligence measures in relation to the selection of hotels for their staff and teams.

c) Labour rights programme for other event-time service providers

Throughout 2020 and 2021, FIFA and the SC have developed a programme to ensure event-time audit and inspection of companies delivering services for FIFA competitions in Qatar. This included the integration of relevant requirements in tender processes by the SC, Q22 and FIFA, as well as pre-contract auditing of accommodation facilities and recruitment practices. An average of 25%



of bidders did not pass the workers' welfare assessment during the tender phase, leading to their disqualification from the process.

This programme also included event-time audits during the FIFA Club World Cup 2020, the Qualifiers for the FIFA Arab Cup 2021, as well as the main tournament of the FIFA Arab Cup in November and December 2021. For example, during the FIFA Arab Cup, a team of 36 experts from the integrated SC/Q22 workers' welfare teams were part of the programme with a total of 2047 worker interviews conducted across different sectors. Through the event-time inspections FIFA, Q22 and the SC identified contractors who failed to comply with the Workers' Welfare Standards and addressed issues for example with respect to working hours, delayed salary payments, as well as in relation to the provision of adequate food. Where possible, issues were addressed on the spot during the competition, with some additional matters being followed up on after the competition, including through the collaboration with the Ministry of Labour.

The programme implemented during the FAC was the first of its kind for any FIFA competition and, as far as we are aware, for any large sporting event. The setup of the programme reflects the need to work with companies well ahead of the event to ensure the required levels of compliance once they start providing services in the lead up and during the competitions. We have already seen important progress in key sectors and are confident that our joint efforts with the SC will help leave a lasting legacy for workers in these sectors.

For more specific information on the steps taken and results of audits of the three security companies mentioned in your letters, we kindly refer you to the respective information shared by the SC Workers' Welfare Department.