

**2021 Questions for Hotel Companies**  
***Migrant Worker Rights***

**Please complete the questions on your company's operations in Qatar. For all answers please ensure you provide as much evidence as possible and links to all policies referenced if publicly available.**

**Scope of operations**

1. Please describe the scope and structure of your company's operations in Qatar in the table below, including the business model each hotel operates under (owned and managed; leased; managed properties; franchised properties; joint ventures; other).

No.	Name of hotel	Business model	Property owner
1			
2			
3			
4			
5			

**Workforce data**

2. Please complete the table below with workforce data.

Employment type	Total number of people	Male	Female	Main nationalities / countries of origin
Directly employed				
Employed by property owner				
Employed by subcontractors (e.g. service providers or labour suppliers)				
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)				

If the exact breakdown is not available, please provide % estimate of workers employed directly and those subcontracted.

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

No.	Labour supply company	Nature of work eg. Cleaning, housekeeping, security	Total number of people
1			
2			
3			

4			
5			

If the exact breakdown is not available, please provide % estimate of workers provided by each company.

### Human rights and due diligence

4. Does your company have a publicly available policy commitment to respect human rights in its operations and throughout its business relationships which specifically addresses workers' rights and references relevant human rights standards (e.g. UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, ILO core labour conventions)<sup>1</sup>. Yes/No. If yes provide link.
5. Does your company have a human rights due diligence process for identifying and prioritising workforce risks in its operations and throughout its business relationships specifically in Qatar? Yes/No. If yes, please explain this process and highlight the top three workforce risks you identified.

### Business relationships and human rights:

6. When selecting business partners, does your company consider how potential partners treat migrant worker rights? Yes/No. If yes, please detail your vetting process for selecting subcontractors and hotel owners. Is consideration given to recruitment fees, wages, general working and living conditions, and health and safety? Are these considerations weighted against cost? What percentage of business relationships are rejected due to risks?
7. Does your company require hotel property owners and subcontractors in Qatar to comply with your human rights and other rights-related policies and procedures (eg. through contract clauses, brand standards)? Yes/No. If yes, please provide link to this policy or other evidence for both property owners and subcontractors. How do you ensure they understand the requirements (e.g. through trainings and workshops) and what mechanisms do you employ to monitor compliance and hold them accountable?

### Recruitment

8. Does your company have a publicly-available policy which requires that no worker in its operations or supply chains should pay for a job, and that the costs of recruitment (i.e., recruitment fees) should be borne by the employer ("Employer Pays Principle")? Yes/No. If yes, please provide link to the policy.
9. Please describe the due diligence process you undertake to ensure that your recruitment standards are applied. In your answer please address specifically:
  - a) Whether you carry out due diligence on recruitment agents in sending countries? Yes/No. If yes, provide details.
  - b) Whether you conduct interviews with workers prior to employment to establish if fees have been paid? Yes/No. If yes, please provide details including percentage of workers you interview.

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<sup>1</sup> According to the [UN Guiding Principles on Business and Human Rights](#), the term "business relationships" encompasses business partners, entities in the company's value chain, and any other State or non-State entity directly linked to its business operations, products, or services. This includes entities in its supply chain beyond the first tier, and indirect as well as direct business relationships. The business partners we are primarily interested in for the purposes of this survey are hotel property owners, management companies, labour suppliers, and service providers.

- c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe.
  - d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.
10. How many instances of recruitment fees paid by workers has your due diligence processes uncovered in 2019 and 2020, and how much (if any) was paid back to workers during this period. What percentage of your workforce were found to have paid fees?

### **Payment & wages**

11. What is your company's process for determining workers' wages in Qatar, and what benchmarks does it use to set wage levels (e.g. do you have a non-discrimination and/or living wage policy; if so please provide)? Please explain how these policies apply to subcontracted workers including how you monitor this and whether you collect data on wages paid by subcontractors.
12. How does your company ensure that workers are paid on time and in full, including for overtime and without illegal deductions? How does this apply to subcontracted workforces? What steps does the company take when your labour suppliers or subcontractors fail to pay workers on time and in full (please illustrate this with specific examples)?

### **Redundancy of workers due to COVID-19**

13. If your company, your subcontractors, or other business partners terminated contracts of workers in your hotels during the COVID-19 pandemic, please state how many workers in total were terminated during 2020 and what percentage of the workforce this represents. Please provide figures for your own operations and that of your subcontractors and business partners, including hotel owners.
14. Please explain the process undertaken to decide which workers would be terminated and what, if any, non-financial assistance was provided to terminated workers (that was not part of their termination package e.g. plane tickets home) that went beyond that prescribed by the Qatari Government. What policies and processes (if any) did you implement to ensure that a fair process was conducted for workers employed by subcontractors, and how did you monitor this?
15. If, and when, workers were terminated, what financial packages/compensation were given to them? What packages/compensation were provided to subcontracted workforces and how did you monitor this?

### **Document retention, job mobility & freedom of movement**

16. How does your company ensure that workers have free and secure access to their passports and identity documents? How does this apply to subcontracted workforces? What steps does the company take when you discover that workers subcontracted at your hotels do not have sole, secure access to these personal items?
17. How does your company ensure that workers are free to change jobs at will and without penalty? How does this apply to subcontracted workforces?

In your answer, please provide information on the following:

- Are there any restrictions based on type or length of contract?
- How many workers have made requests to change employer using the new Ministry of Labour sponsorship transfer process and how many of these transfer requests were granted?
- Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?

18. Do you have a policy that specifies workers should not be subject to restrictions on movement, including curfews in provided accommodation? Yes/No. If yes, please provide the policy or other evidence. If there are curfews, are there any differences in treatment of men and women? Yes/No. Does your policy apply to subcontracted workers?

### **Health & safety**

19. Do you have specific policies and protocols to manage outdoor work (e.g. security, gardening, cleaning) and prevent the risk of heat stress beyond implementation of the national summer working hours ban? Yes/No. If yes, please provide the policy or other evidence. Does this apply to subcontracted workers? Yes/No. If yes, please provide policy or other evidence.
20. Do you have policies and procedures in place to protect workers from becoming infected with the COVID-19 virus? Yes/No. If yes, please policy or other evidence. Does this apply to subcontracted workforces? Yes/ No. If yes, please provide the policy or other evidence.

### **Living conditions**

21. Please provide your company's standards for workers' living conditions (Please provide policy or other evidence). What steps does the company take to monitor the performance of subcontractors and labour suppliers to house workers against company and government standards? What remedial action is taken if these standards are breached?
22. Please describe any changes you made to workers' living conditions in response to the COVID-19 pandemic. Do these apply to subcontracted workers? Please detail how you monitored compliance with any new COVID-19 specific requirements specified by your policies or by the Qatari Government.

### **Prevention of discrimination, physical and sexual abuse, exploitation and harassment**

23. Does your company have the following policies:
- On the prevention of bullying, discrimination and physical abuse of workers, by fellow workers and/or hotel clients in its operations and business relationships? Yes/No. If yes, please provide the policy or other evidence.
  - On the prevention of sexual abuse, exploitation, and harassment by fellow workers and/or hotel clients in its operations and business relationships. If yes, please provide the policy or other evidence.
24. Please provide the following information on the systems in place for reporting, investigating and redressing cases of abuse:
- How are workers made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?
  - How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?
  - Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?
  - What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?
  - What support you provide workers who make a claim of sexual abuse, including by hotel clients? including to file a criminal complaint, seek medical care, and pursue redress against a perpetrator, such as a hotel client? Does any provision of support also apply to subcontracted workers?
25. How many grievances were raised by workers in 2019 and 2020 in relation to:
- Bullying, discrimination, physical abuse in its own operations?
  - Bullying, discrimination, physical abuse in its subcontracted workforce?
  - Sexual abuse, exploitation, and harassment in its own operations?
  - Sexual abuse, exploitation, and harassment in its subcontracted workforce?

## **Representation & remedy**

26. How many of your hotels in Qatar have worker committees or an equivalent mechanism for worker organising? How are worker representatives selected? Do the committees cover subcontracted workers?
27. In line with the UN Guiding Principles on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? How are workers made aware of this mechanism? How are subcontracted workers made aware of this mechanism?
28. How many grievances were raised by workers in 2019 and 2020 in relation to:
- Recruitment costs?
  - Wages?
  - General working or living conditions?
  - Health and safety?
  - How many of these grievances were raised by subcontracted workers?

## **Other information**

29. Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in the Gulf region, including any challenges it faces in doing so?