

## 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.**

This is the response of IHG Hotels & Resorts (dated 12 March 2021) to BHRRC's invitation to provide information regarding migrant workers employed in IHG-branded hotels in Qatar.

### Scope of operations

- 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).**

All IHG-branded hotels in Qatar are managed properties. Information on IHG's ownership model is provided in the table below. For further information on IHG's structure and business model, please see our [2020 Modern Slavery Statement](#).

### Our ownership model

Key differences between our three main models are as follows:

Business Model	Hotel ownership	Hotel Employees	Brand ownership, marketing and distribution
Franchised	Third party owner	Employed by third party owner	
Managed	Third party owner	Generally employed by third party owner except in certain locations (e.g. the US, where IHG is the employer). Certain senior employees such as General Manager and Financial Controller typically employed by IHG	IHG
Owned and Leased	IHG	Employed by IHG	

No.	Name of hotel	Business model	Property owner
1	InterContinental Doha Hotel	Managed	Gulf Hotels Company
2	InterContinental Doha Residences	Managed	Gulf Hotels Company
3	InterContinental Doha The City	Managed	Ajaj Group
4	Crowne Plaza Doha The Business Park	Managed	Trans Orient Establishment
5	Holiday Inn Doha The Business Park	Managed	Trans Orient Establishment
6	Crowne Plaza Doha West Bay	Managed	Tanmiyat Holding
7	Staybridge Suites Doha Lusail	Managed	Al Sraiya Hotels & Hospitality
8	Voco Doha West Bay Suites	Managed	Al Rabban Hospitality

## 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 by IHG	6	4	2	
Employed by property owner	1,314	943	371	India, Bangladesh, Nepal, Philippines, Sri Lanka, Nigeria, Kenya.
Employed by subcontractors (e.g. service providers or labour suppliers)	-	-	-	
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)	111	96*	15*	Bangladesh, Nepal, India.

\*including an approximative gender breakdown for two hotels

Note: numbers provided are current at the time of completion of the survey.

**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 [i.e. recruitment agencies for direct employees of the hotel and recruitment agencies for contracted labour]

No.	Nature of work e.g. Cleaning, housekeeping, security	Total number of people
1	Housekeeping, rooms and public areas attendants, pool and health club attendants.	7 ca
2	Housing and canteen attendants.	10
3	Housekeeping, rooms and public areas attendants	3 ca
4	Housekeeping, rooms and public areas attendants	6 ca
5	Valet drivers.	Subject to operational need
6	Security.	42
7	Valet drivers.	1
8	Housekeeping	2
9	Housekeeping and cleaning services.	6
10	Housekeeping	6+ (subject to operational need)
11	Housekeeping, food and beverage.	Subject to operational need
12	Housekeeping and food and beverage.	Subject to operational need

13	Valet drivers.	Subject to operational need
14	Housekeeping, rooms and public areas attendants	3 ca
15	Recruitment agency	3
16	Recruitment agency	0*
17	Recruitment agency	0*
18	Recruitment agency	0*
19	Recruitment agency	0*
20	Recruitment agency	6

\*existing labour supply relationship, although no workers were recruited in 2020.

**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.**

In 2019, with assistance from a specialist business and human rights consultancy, Article One, we significantly updated our Human Rights Policy. IHG's Human Rights Policy sets out our commitment to respecting human rights in accordance with the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Labour Organisation's ('ILO') Declaration on Fundamental Principles and Rights at Work. Our approach is also informed by the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development ('OECD'), the UN Global Compact and the UN Guiding Principles on Business and Human Rights ('UN Guiding Principles').

Under the Supplier Code of Conduct, IHG suppliers are expected to support the respect of human rights in accordance to the international human rights standards listed in our policy. IHG expects suppliers to adhere to these standards both within their own business and across their supply chains.

[Human Rights policy \[Link\]](#)

[Supplier Code of Conduct policy \[Link\]](#)

<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.

**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.**

IHG is committed to ongoing human rights due diligence, covering relationships with third-party hotel owners, our own operations, and our supply chain. Further information on our global approach to human rights due diligence is provided in IHG's [2020 Modern Slavery Statement \[Link\]](#).

In terms of regional activities, in 2020 we conducted a high-level mapping of the workforce employed by our hotels in Oman and Qatar to assess the potential impact of recruitment and labour practices.

Together with members of the Sustainable Hospitality Alliance (SHA), IHG and our hotels in Qatar participated in the development of 'Promoting Fair Recruitment and Employment: A Guidance Tool for Hotels in Qatar'. This was a collaborative initiative among the Ministry of Administrative, Development Labour and Social Affairs in Qatar, the ILO Project Office for the State of Qatar, the IHRB, the SHA and hotel representatives. The tool provides a set of resources for hotels, such as sector-specific guidance for engagement with labour recruiters and service providers and easy-to-use checklists to drive responsible recruitment practices across the industry. It was shared with the IHG hotels in Qatar and we will seek to adopt all relevant resources and learnings in other locations to continue developing the human rights due diligence of our recruitment practices.

In addition, we have carried out regional due diligence and risk assessment work, in particular through a market-level labour standards assessment in Oman with a focus on migrant workers which was undertaken in early 2020 (prior to the impact of Covid-19). The assessment was carried out by Article One, our external human rights advisors, and included visits to all seven IHG hotels in Oman and input from a range of stakeholders including hotel leadership, colleague focus groups, and external stakeholders such as local and international NGOs. In total, Article One spoke with 293 colleagues across seven hotels (including direct employees of the hotels and workers employed by third parties). The assessment and report was completed in Q1 2020 and included a review of key areas covered by the Dhaka Principles and the SHA Forced Labour Principles, such as payment of fees for jobs, clear and transparent contracts, retention of identity documents, and working and living conditions.

In terms of workforce risks, the assessment found that compared with direct employees of the hotel, workers employed through third parties (casual and contract workers) were more likely to have experienced potential forced labour issues, such as retention of passports, recruitment fees, poor living conditions and difficulties obtaining NOCs. More information can be found in our [2020 Modern Slavery Statement \[Link\]](#) on page 12.

Whilst Covid-19 has had an impact on the pace at which we have been able to carry out work to further analyse and address the findings, the assessment has greatly enhanced our understanding of potential forced labour and migrant worker issues in relation to IHG's operations both in Oman and more broadly across the region including in Qatar. This understanding has been particularly useful in the context of the Covid-19 crisis and has initially been used, alongside other information sources, to inform the development of IHG's Staff Accommodation Guidance and Migrant Worker Checklist.

## **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?**

At corporate level, we carry out risk-based due diligence and compliance checks on new third-party hotel owners with whom we are entering hotel agreements. Escalation criteria (which explicitly include human rights concerns or allegations such as those related to human trafficking or forced or child labour) ensure a central committee of senior IHG decision-makers consider and review any material issues. In 2020, we can confirm that a number of proposed new hotel agreements did not proceed following this process.

IHG and our hotels in Qatar participated in the development of 'Promoting Fair Recruitment and Employment: A Guidance Tool for Hotels in Qatar'. This was shared with the hotels and some have already started evolving their due diligence practices when selecting labour supply companies. For example, the Staybridge Suites Doha Lusail includes vetting criteria on the living conditions and health and safety of the workers of subcontractors. The hotel holds interviews with the workers to find out more about their living conditions and visit the accommodation.

We are working on building on the best practice included in IHRB's toolkit (Promoting Fair Recruitment and Employment: A Guidance Tool for Hotels in Qatar) to provide IHG hotels with specific guidance on how to continue evolving their labour supply due diligence. For more details see question 29.

- 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 (e.g. 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?**

Yes. All IHG-branded hotels in Qatar are managed by IHG. Our hotel management agreements contain provisions requiring that hotels managed by IHG are run in accordance with IHG's policies and procedures, as well as IHG brand standards. These include the global human rights brand standard which is applicable to all IHG-branded hotels and requires the implementation of a human rights policy. Managed hotels have to implement IHG's hotel human rights policy.

IHG's human rights brand standard was updated in 2020 to focus on those human rights areas most relevant to hotel operations - key responsible recruitment practices and principles to combat forced labour and anti-human trafficking. To help aid the understanding of the requirements and to raise awareness of labour sourcing and other human rights risks, as part of the supporting/guidance materials available with the brand standard and more generally, we have the following training and resources available for hotels:

- the SHA's 'Responsible Recruitment' e-learning and ECPAT USA and Polaris' 'Preventing Human Trafficking' e-learning.
- Guidelines on checking recruitments agencies (developed by the SHA, formerly ITP).

Under the Supplier Code of Conduct, IHG suppliers are expected to support the respect of human rights in accordance to the international human rights standards listed in our policy. IHG expects suppliers to adhere to these standards both within their own business and across their supply chains.

As part of monitoring compliance, the Confidential Reporting channel is available to all IHG-branded hotels and corporate colleagues and can be used by any person with a relationship to IHG, including our third-party suppliers and contractors. In addition to this, hotels continue to have informal conversations with workers to gather information on their working and living conditions. If any concerns are raised, the hotel will follow up on these with the subcontractor.

## **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.**

Yes. Following IHG's public commitment in 2018, the SHA Principles of Forced Labour have also been explicitly incorporated into our Human Rights Policy. Our Supplier Code of Conduct also incorporates these principles which set out the minimum standards under which IHG suppliers are expected to operate. We expect our suppliers to adhere to these standards across their own business and to apply these standards across their own supply chains. See answer to question 4 for links to our Human Rights Policy and Supplier Code of Conduct.

- 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.**

- I. IHG-branded hotels in Qatar work with agencies accredited by the source country's government, for example the InterContinental Doha, the InterContinental Doha Residences and the Crowne Plaza Doha West Bay work with accredited recruitment agencies in Nepal, the Philippines and India.

Hotels will continue to evolve their due diligence approach by adopting the 'Promoting Fair Recruitment and Employment: A Guidance Tool for Hotels in Qatar' toolkit's best practice and participating in labour supply chain mapping projects.

- 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.**

- I. The majority of IHG-branded hotels in Qatar have processes in place to interview all recruited workers. Please note that not all hotels recruit through third-party labour providers.

In 2020, we updated our brand standard supporting guidance materials to recommend that inductions for migrant workers should include interviews to determine whether recruitment related fees have been paid so that remedial action can be taken.

- c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe.**

- I. All offer letters are sent directly to the personal email of the successful candidates, followed by a call to discuss details and answer queries. The State of Qatar opened Qatar Visa Centers in key countries where the majority of expatriate workers are recruited from, such as Sri Lanka, Philippines, Nepal, India, Bangladesh, Kenya, Pakistan. Medicals and

contract signing are done at these centers by the candidate prior to processing and issuance of work visas.

**d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.**

- I. Hotels have informal conversations with subcontractor workers. If any allegations either by the workers or others are made in relation to a certain subcontractor, these would be investigated. For example, In August 2020, IHG was contacted by BHRRC, requesting a response to allegations that workers employed by a security company providing services to an IHG-branded hotel in Doha, Qatar, were being housed in poor conditions. We reviewed the allegations thoroughly, including checks undertaken by the hotel, and engaged directly with the supplier, including an on-site visit of the accommodation. Whilst the majority of the allegations have not been substantiated, we continue to engage with the supplier on some areas of the complaint, including cafeteria food quality and diversity, worker communication and grievance mechanisms.

In addition, as part of monitoring compliance, the Confidential Reporting channel can be used by any person with a relationship to IHG, including workers of our third-party suppliers.

**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?**

Most hotels have not recorded any instances of recruitment fees in 2019/2020. Given Covid impacts there was little or no recruitment during 2020. However, the voco Doha West Bay discovered that 2 workers (representing 2.5% of workforce) had paid recruitment fees. These were reimbursed by the recruiting agency.

**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.**

As stated in our Code of Conduct, IHG is committed to providing equality of opportunity without discrimination. We recruit and promote individuals based solely on their suitability for the job and do not discriminate on the grounds of race, colour, ethnic or national origin, gender, sexual orientation, gender identity or expression, age, religion, marital status, disability, or any other characteristic protected by national, state or local legal requirements

Remuneration of a successful candidate is based on their experience and the alignment of this to the role's requirements. IHG-branded hotels in Qatar follow the Qatari labour law and use IHG's Paytool System to benchmark compensation against the market/competition.

The source data for the Paytool System comes from the Aon Hotel Industry Reward Group (HIRG) annual market salary survey. Aon collate salary data from a large number of participating hotel groups, for a wide variety of hotel roles across Bands 1-10. The market salary data is presented back to IHG on a consolidated basis for each role.

Hotels do not collect information on how labour supply companies determine the wages of their workers.

**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)?**

Salaries are deposited into individual bank accounts on a monthly basis. The bank accounts are linked to the Wage Protection System of the Ministry of Labour that monitors payments and deductions. Employee attendance is monitored through attendance system and the payroll system is also linked to the Wage Protection System to ensure all workers are paid accurately as per contract and on time.

This system applies to all workers in Qatar; however, hotels do not have visibility on the Wage Protection System of subcontractor workers. Some hotels hold informal interviews with the workers to assess if regular payments are being made. Following the start of the pandemic, the Staybridge Suites is housing contractors in the hotel's staff accommodation which is providing them with the opportunity to assess the status of payments on a more regular basis.

If hotels detect that subcontractor workers are not being paid in full or on time, they contact the subcontractor to ensure that payments are made.

**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.**

- Employed by IHG – 0 (note in line with our business model, IHG only employs a minimal number of hotel workers in Qatar - these are hotel General Managers only)
- Hotel colleagues employed by property owner – 153 representing 12% of consolidated workforce
- Subcontractors - 136 representing 10% of consolidated workforce
- Total number of terminated hotel colleagues – 289

As many hotels closed or reduced their operations in 2020, the workforce had to adapt to more variable business needs across the year. Although a number of colleagues were made redundant, some of them were re-hired as the hotel operations were scaled up again.

**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?**

As set out in the [IHG Code of Conduct \[Link\]](#) and [Diversity & Inclusion Policy \[Link\]](#), IHG is committed to providing equality of opportunity without discrimination. We recruit and promote individuals based solely on their suitability for the job and do not discriminate on the grounds of race, colour, ethnic or national origin, gender, sexual orientation, gender identity or expression, age, religion, marital status, disability, or any other characteristic protected by national, state or local legal requirements.

Hotel employees who unfortunately had to be made redundant due to the impact of the Covid-19 pandemic were selected based on business need (e.g. whether roles continued to be required in light of significantly reduced operations), performance and length of service (e.g. on probation and/or less than one year's service). All redundancies have been undertaken in accordance with Qatari labour law.



Those employees who were made redundant were allowed 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 former employees have decided to return home, the hotel has funded the cost of repatriation.

IHG has supported the re-deployment of former hotel employees into other work opportunities. For example, the InterContinental Doha Hotel and Doha Residences initially terminated 71 colleagues, but as the operations scaled back up 33 colleagues were rehired, 6 colleagues found employment at other hotels and 5 colleagues were transferred to other IHG-branded hotels in Qatar.

With respect to property owners, as all IHG-branded hotels in Qatar are managed by IHG, redundancies of hotel colleagues employed by property owners were managed by IHG as outlined above.

Hotels do not have visibility of subcontracted workers' compensation, e.g. due to employment relationship sitting with sub-contracted entity. However, they would follow up on any concerns raised.

IHG's confidential reporting hotline is one of the channels workers can use to express any concerns. For more information on the confidential reporting hotline, please see question 24.

**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?**

All hotel employees who were made redundant due to the impact of the Covid-19 pandemic were paid in accordance with Qatari labour law. This included notice period payments, remaining salaries paid according to days worked and accrued recuperation and vacation days, including any advanced vacation entitlement already taken. In addition, as noted above, those employees who were made redundant were allowed 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 former employees have decided to return home, the hotel has funded the cost of repatriation.

Hotels do not have visibility of subcontracted workers' compensation, e.g. due to employment relationship sitting with sub-contracted entity. However, they would follow up on any concerns raised.

IHG's confidential reporting hotline is one of the channels workers can use to express any concerns. For more information on the confidential reporting hotline, please see question 24.

**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?**

Hotels align to the Qatari Labour Law which prohibits the withholding of worker passports. Every employee retains possession of their own passport, which they keep in their personal lockable storage.

Hotels do not have visibility of subcontracted workforce's access to their passports. Hence, they try to assess this through informal conversations with the workers. For example, the InterContinental Doha The City holds interviews at random on a monthly basis. Any issues identified would be followed up with the relevant company. Subcontractors may ask the hotel to store their passports for safekeeping, although this is on an ad-hoc basis.

**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?**

Employees hand in their resignation letter followed by a notification through the online system of the Ministry of Administrative Development, Labour and Social Affairs (ADLSA). The hotel will provide a written confirmation of the contract's termination followed by a notification the online system of ADLSA. The employee will complete the remaining steps of the online process with the help of the new employer to inform the Ministry of all needed details.

**In your answer, please provide information on the following:**

- **Are there any restrictions based on type or length of contract?**

There are no restrictions.

- **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?**

Total number of requests made – approx. 200 (including transfers, redundancies and resignations).

Total number of granted requests – approx. 190 (we understand a small number are still awaiting confirmation from the Ministry of Labour).

- **Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?**

Notice period depending on the employee's length of service.

**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?**

As explicitly set out in our [Human Rights Policy \[Link\]](#), IHG is committed to supporting the SHA's Forced Labour Principles, which includes ensuring every worker (irrespective of gender) should have freedom of movement. Our commitment applies globally to all IHG corporate offices, reservation centres, managed hotels and we expect those we do business with to uphold similar standards.

In addition, an IHG Migrant Worker Checklist was produced in 2020 to support hotels and operations teams to address migrant workers' needs to prevent and mitigate impact of the Covid-19 pandemic. This is relevant to all workers (including sub-contracted workers) employed at the hotel premises and/or those workers (including sub-contracted workers where applicable) living in hotel staff living accommodation. The Checklist states the following with respect to freedom of movement (irrespective of gender):

"Hotels must only restrict colleagues' freedom of movement where necessary during a crisis and in accordance with applicable local laws and regulations, e.g. to protect public health in a pandemic. It is critical that any restrictions and the reasons for these are clearly communicated to colleagues and that they have the opportunity to ask questions and raise concerns. Hotels should continue to ensure that migrant workers have direct access to their identity and travel documents at all times."

This guidance is available to General Managers across all IHG hotels and hotel support teams and has been communicated via IHG's regional senior leadership and operations teams.

## 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.**

IHG recommends properties assess the risk of workers working outside for which a risk assessment template is provided. This supports hotels in assessing health and safety risks for all hotel roles and align to IHG's Brand safety standards. Typically, hotels refrain from having workers working outside in direct sun, where possible, or look at rescheduling the work at a different time of the day. For example, the voco Doha West Bay is situated in a high-rise building with a few green areas which are attended to at sunset during the summer months. If the role does not allow this (i.e. lifeguard, etc.), the InterContinental Doha and Doha Residences provide a summer allowance for sun lotion, extra uniform items (i.e. caps), etc.

**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.**

Hotels follow the IHG guidance on health and safety measures related to Covid, as well as the Qatari Ministry's guidance.

IHG's Global COVID safety guidance is based on the World Health Organisation guidance – if local guidance goes beyond this, then our properties may follow local guidance and legislation in addition to the IHG Way of Clean. All properties are recommended to complete a COVID risk assessment taking into account IHG global guidance and local guidance.

IHG's Global COVID Safety Guidance can be found IHG's intranet in our Hotel Ready Languages which are the most common languages across our operations. This includes:

- COVID-19 cleanliness and safe operations procedures, including guidance on cleaning and disinfecting procedures and on preventing the spread of the disease
- IHG Way of Clean
- COVID-19 protective equipment, including how to where PE
- Opening your hotel safely, including COVID-19 infection control hotel risk assessment and cleaning and disinfecting your hotels used for isolation and quarantine

The guidance, including posters and health and safety training, applies to all relevant hotel roles, regardless if hotel employees or subcontractor workers.

Further information on IHG's 'Way of Clean' programme is available in the [IHG 2020 Annual Report \[Link\]](#) and page 12 of our [2020 Modern Slavery Statement \[Link\]](#).

## 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?**

The IHG Hotel Staff Accommodation Guidance outlines considerations for IHG-branded hotels and third-party labour providers that provide staff living accommodation for workers at IHG-branded hotels. This guidance is available to General Managers across all IHG hotels and hotel support teams and has been communicated via IHG's regional senior leadership and operations teams. It covers a number of issues, including applying social distancing (e.g. reducing and/or

limiting the number of colleagues per room), maintaining hygiene, cleaning of staff accommodation, and meals and food preparation.

The guidance is relevant to all workers (including sub-contracted workers where applicable) living in hotel staff living accommodation. Where a hotel, owner or operator does not directly manage staff accommodation, IHG encourages engagement with the third-party responsible to ensure that the guidance and principles set out in the IHG Hotel Staff Accommodation Guidance are taken into account.

We continue to engage on this topic with regional teams that support hotel operations, so they are better able to identify and escalate issues and communicate expectations in this area, as well as monitor and assess the migrant worker risk at hotel level via our risk management approach and the ongoing monitoring of the IHG confidential hotline.

IHG is committed to providing effective remedy where allegations or concerns with respect to workers' living conditions (or other potential human rights infringements) within our sphere of influence are identified. In August 2020, IHG was contacted by BHRRC, requesting a response to allegations that workers employed by a security company providing services to an IHG-branded hotel in Doha, Qatar, were being housed in poor conditions. We reviewed the allegations thoroughly, including checks undertaken by the hotel, and engaged directly with the supplier, including an on-site visit of the accommodation. Whilst the majority of the allegations have not been substantiated, we continue to engage with the supplier on some areas of the complaint, including cafeteria food quality and diversity, worker communication and grievance mechanisms.

**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.**

IHG have recommended that hotel staff living accommodation (which also accommodates subcontracted workers, where applicable) follow the same safety and cleaning principals of IHG-branded hotel guest accommodation, following our global guidance and local regulations where applicable. Further information on IHG's 'Way of Clean' programme is available in the [IHG 2020 Annual Report \[Link\]](#).

Examples of changes undertaken in relation to hotel staff living accommodation in Qatar include:

- Mitigating the risk of virus transmission:
  - Regular deep-cleaning and disinfection of staff living accommodation in accordance with enhanced Covid-19 protocols.
  - Strict segregation of any suspected cases (including use of designated hotel accommodation where appropriate – e.g. use of dedicated isolation rooms for those with flu like symptoms, suspected cases or those exposed to a positive case).
  - Relocating workers (including sub-contracted workers) from outside accommodation to IHG staff living accommodation.
  - Canteen buffet services replaced with packed meals.
- Facilitation of social distancing:
  - Reduced seating capacity in staff canteens.
  - Use of floor markers in common areas.
  - Limits on shuttle bus capacity.
- Increasing communications and awareness through e.g. posters, notices and staff forums.

As noted in our responses above, to address the increased risks in response to Covid-19, IHG also developed additional guidance to support hotels and operations teams to address migrant workers' needs to prevent and mitigate impact. This includes the IHG Hotel Staff Living Accommodation Guidance, which sets out health and safety considerations in the context of

Covid-19 for IHG-branded hotels and third-party labour providers that provide staff living accommodation for workers at IHG-branded hotels.

This guidance is further supported by additional IHG guidance and other requirements available to IHG hotels in Qatar on the IHG Intranet, including: Prevention and Control of Communicable Diseases; Cleaning and Disinfectant Guide; SOP: Social Distancing in a Hotel Environment; Hotel and Corporate Office Response Toolkit; Response to guest/colleague suspected illness.

All employee COVID incidents (whether hotel or staff accommodation) in IHG managed properties in Qatar are recorded and monitored via our risk management system, where they are followed up by a member of the regional risk team.

## **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.**

IHG does not tolerate any type of harassment or bullying, and this is clearly stated in our [Code of Conduct Code \[Link\]](#). The Code applies to all the managed hotels and hotel colleagues, both employees and subcontractor workers, are trained on the principles set out in the Code. The training has a section which focuses on human rights.

- **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.**

As stated above our Code of Conduct sets out that IHG does not tolerate harassment, including sexual harassment and encourages colleagues to report this. IHG's commitment to respecting human rights applies globally to all IHG corporate offices, reservation centres, managed hotels and we expect those we do business with to uphold the same standards. IHG's human rights policy clearly states that IHG condemns and prohibits the any form of human trafficking or exploitation.

[Code of Conduct \[Link\]](#)  
[Human Rights policy \[Link\]](#)

### **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)?**

The Code training which also focuses on human rights and the confidential reporting channel is provided for all colleagues working in managed hotels. Colleagues are asked to complete it on an annual basis. In addition to the training, hotels also raise awareness of the policies and reporting protocols during the onboarding of new joiners, posters in colleague areas, meetings/ briefings, comment boxes, IHG's intranet.

It is important that our colleagues and any person that has a relationship with IHG, including our suppliers and their workers, feel comfortable reporting ethical concerns. To facilitate this, we have a confidential reporting channel to share any ethical concerns or breaches of the IHG Code of Conduct, including in relation to human rights and modern slavery. We do not permit retaliation against employees 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. This channel is available to

all IHG-branded hotels and corporate colleagues and can be used by any person with a relationship to IHG, including our third-party suppliers and contractors. We take all allegations concerning modern slavery issues within our hotels and supply chains very seriously and 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](https://ihgethics.com)) or via the Ethics and Compliance team's email address ([ethicsandcompliance@ihg.com](mailto:ethicsandcompliance@ihg.com)). IHG commits to undertaking inquiries for all received reports, which are reviewed and investigated by a group of dedicated personnel.

- **How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?**

Our hotel management agreements contain provisions requiring that hotels managed by IHG are run in accordance with IHG's policies and procedures as well as IHG brand standards.

Please also see question 7 for more details.

- **Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?**

Yes - IHG's confidential reporting channel is available to all IHG-branded hotels and corporate colleagues and can be used by any person with a relationship to IHG, including our third-party suppliers and contractors.

- **What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?**

We do not permit retaliation against employees 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.

Workers, including subcontracted workers, are able to report concerns confidentially via the IHG Confidential Reporting Channel.

- **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?**

Following a claim of sexual abuse, the hotel would investigate this regardless if an employee or subcontractor worker made the report.

## **25. How many grievances were raised by workers in 2019 and 2020 in relation to:**

- **Bullying, discrimination, physical abuse in its own operations?**

2020 – 1 report  
2019 – 3 reports

- **Bullying, discrimination, physical abuse in its subcontracted workforce?**

- **Sexual abuse, exploitation, and harassment in its own operations?**

2020 – 1 report  
2019 – 1 report

- **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?**

Hotels use a variety of methods of gathering worker feedback, including question boxes, employee forums and breakfast with the GM. For example, the InterContinental Doha Hotel and Doha Residences have a number of social welfare committees, some which are instituted by the hotel management and others are voluntary.

To provide all hotels with the tools and resources to easily adopt this practice, IHG is currently working on gathering worker voice best practice.

### **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?**

Yes – IHG's confidential reporting channel. 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 our suppliers and their workers to speak up and report concerns in their native language.

IHG do not permit retaliation against employees 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. Due to the confidential nature of the reporting channel, we cannot identify nor record if reports are being made by employees or subcontractor workers.

The Code of Conduct raises awareness of the confidential reporting line and this applies to managed hotels. All managed hotel colleagues are asked to annually complete the Code of Conduct training. In addition to this, hotels also raise awareness of the reporting line via poster on notice boards, meetings/ briefings, etc.

### **28. How many grievances were raised by workers in 2019 and 2020 in relation to:**

- **Recruitment costs?**

2020 – 2 reports

- **Wages?**

2020 – 2 reports

2019 – 5 reports

- **General working or living conditions?**

2020 – 3 reports

2019 – 5 reports

- **Health and safety?**

No grievances were raised through our confidential hotline. Please note that health and safety incidents are handled through a number of risk management tools.

- **How many of these grievances were raised by subcontracted workers?**

Due to the confidential nature of the reporting channel, we cannot identify nor record if reports are being made by employees or subcontractor 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?**

#### SHA collaborative initiatives

- 'Promoting Fair Recruitment and Employment: A Guidance Tool for Hotels in Qatar'  
Together with members of the SHA, IHG and our hotels in Qatar participated in the development of 'Promoting Fair Recruitment and Employment: A Guidance Tool for Hotels in Qatar'. This was a collaborative initiative among the Ministry of Administrative Development, Labour and Social Affairs in Qatar, the ILO Project Office for the State of Qatar, the IHRB, the SHA and hotel representatives.
  - o The tool provides a set of resources for hotels, such as sector-specific guidance for engagement with labour recruiters and service providers and easy-to-use checklists to drive responsible recruitment practices across the industry. It was shared with the IHG hotels in Qatar and we will seek to adopt all relevant resources and learnings in other locations to continue developing the human rights due diligence of our recruitment practices.
- Building on the IHRB's Qatar toolkit, IHG is working with a business and human rights consultancy to expand on the best practice addressing migrant worker risks. The aim is to provide hotels with specific tools and resources that are easy to adopt and drive consistent practices.
- Engagement on multi-stakeholder projects with international organisations which are researching migrant corridors and mapping labour supply chains from a few source countries, including the Philippines, Kenya, Uganda.

For more information see our [2020 Modern Slavery Statement \[Link\]](#).