

# "If we complain, we are fired"

Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites



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## Equidem

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

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## Abbreviations and Acronyms

<b>BWI</b>	Building and Woodworkers International
<b>CAGR</b>	Compound Annual Growth Rate
<b>CARC</b>	Compound Annual Rate of Change
<b>CERD</b>	Convention on the Elimination of All Forms of Racial Discrimination
<b>GCC</b>	Gulf Cooperation Council
<b>ICCPR</b>	International Covenant on Civil and Political Rights
<b>ILO</b>	International Labour Organization
<b>MEED</b>	Middle East Economic Digest
<b>MEP</b>	Mechanical, Electrical, and Plumbing
<b>NOC</b>	No Objection Certificate
<b>QAR</b>	Qatari Riyal
<b>SC</b>	Qatar Supreme Committee for Delivery and Legacy
<b>UN</b>	United Nations
<b>UNGPs</b>	United Nations Guiding Principles on Business and Human Rights
<b>WHO</b>	World Health Organization
<b>WPS</b>	Wage Protection Systems



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## Executive Summary

“

We are forced to keep working. Once when a FIFA group came to Lusail Stadium, workers were on site. Workers have seen deaths and other accidents. If they complain, there is a risk that the licence of the company [Hamad Bin Khalid Contracting Company] may be revoked. To avoid this, we were all sent to the camp at least an hour or two before the FIFA group's arrival. Everyone was sent to camp. There was no worker on site...

The company rang the fire alarm on purpose. When people heard this alarm, everyone came out. These fire drills are given regularly so people would gather in prescribed open spaces. After that, HBK managers would bring out the buses and take us away...

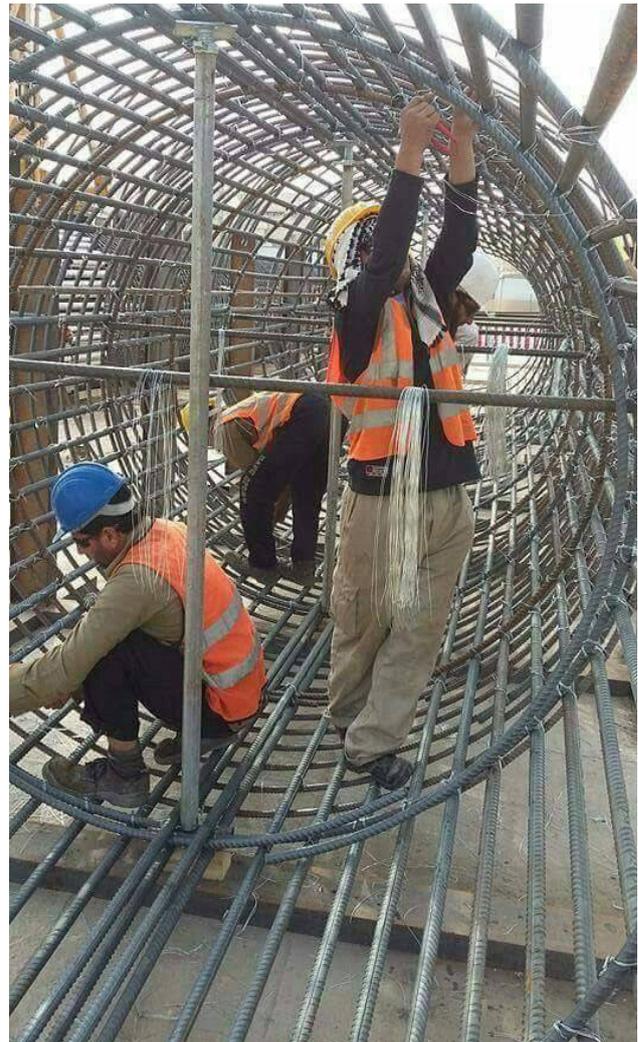
At first people believed those fire alarms. Everyone used to come out whenever the alarm rang. After this happened about two or three times, people stopped coming out. Workers started to hide to get a chance to complain to the FIFA group. Then the company started checking if anyone is still on site. If anyone was caught hiding, they were either sent back home or had their salary deducted.”

– A NEPALESE WORKER EMPLOYED BY HAMAD BIN KHALID CONTRACTING COMPANY ON LUSAIL STADIUM<sup>1</sup>



<sup>1</sup> A Nepalese worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Nepal, July 2022.

Major construction firms building stadiums for the FIFA World Cup Qatar 2022 actively evaded labour inspections, subjecting migrant workers from Africa and Asia to serious human rights abuse. This occurred despite labour reforms by the Qatar government and measures by FIFA and its partners set up specifically to protect migrant workers from abuse. Practices included illegal recruitment charges, nationality-based discrimination, unpaid wages, working in extreme heat and other health and safety risks, overwork, and workplace violence. Some of these practices were used by World Cup construction firms to create a captive and controllable workforce and amount to forced labour indicators as defined under international standards.<sup>2</sup> As one Nepalese construction worker on Lusail Stadium told Equidem, “nothing changed after FIFA visits. The first few days they talked as if they were going to make real changes. But nothing really happened.”<sup>3</sup>



Workers on Lusail Stadium, where the Final of the FIFA World Cup Qatar 2022 will be played, described experiencing tension and exhaustion because of their working and living conditions. © Equidem 2022



Khalifa International Stadium © Equidem 2022

2 “ILO Indicators of Forced Labour”, International Labour Organisation, October 1, 2012, accessed online on October 24, 2022, [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/publication/wcms\\_203832.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf).

3 A Nepalese worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Nepal, July 2022.

Investigations by Equidem between September 2020 and October 2022 documented significant labour and human rights violations at all eight FIFA World Cup Qatar 2022 stadiums—Lusail Iconic Stadium in Lusail, Al Bayt Stadium in Al Khor, Al Janoub Stadium in Al Wakrah, Ahmad Bin Ali Stadium in Al Rayyan, Khalifa International Stadium and Education City Stadium in Al Rayyan and Stadium 974 and Al Thumama Stadium in Doha. Equidem carried out in-depth, confidential, one-to-one interviews with 60 migrant workers employed across all eight FIFA World Cup Qatar 2022 stadiums and spoke to a total of 982 workers employed at these sites.

Equidem wrote to the Qatar government, FIFA and the Supreme Committee for Delivery and Legacy prior to publication. The Qatar government did not respond, despite repeated requests for comment and frequent dialogue with Equidem over the last six years. Responses from FIFA and the Supreme Committee for Delivery and Legacy, and four companies are at Appendix of this report. The Supreme Committee said:

***We believe that the allegations contained in our report should still be properly investigated and acted upon by the Supreme Committee. We look forward to working with FIFA and the Supreme Committee to ensure that the issues we raised are investigated and remediated, and that workers receive just compensation for the violations they have suffered.***

***As importantly for the long term wellbeing of migrant workers in Qatar, and especially since the Workers’ Welfare Forum model piloted by the Supreme Committee is being used by the Ministry of Labour to develop and roll out Joint Committees across the country, we look forward to working the Supreme Committee to assess the Workers’ Welfare Forum model—including its strengths and areas for improvement—based on the findings of our investigation.***

Equidem made efforts to contact the companies identified in the report and shared all worker allegations with each company prior to publication. When we received responses from companies, we evaluated the responses received, assessed these responses in relationship to the facts presented by the workers, and included company responses in relationship to worker allegations in the report.

Only four of the companies responded: Advanced Construction Technology Services, Al Sulaiteen Agricultural and Industrial Complex, Galfar Al Misnad, and Webuild Group (formerly Salini Impreglio). Each of these companies denied all the allegations involving their projects on stadium sites.

Advanced Construction Technology Services responded:

***What is mentioned in this report is totally incorrect. The Supreme Committee is coming to monitor every month and all of our reports are clear.***<sup>4</sup>

Al Sulaiteen Agricultural and Industrial Complex (SAIC) responded:

***SAIC has always abided and committed to the implementation of all worker’s welfare standards, regulations enforced by Ministry of Labour (MOL) and Supreme Committee for Legacy (SC) related to SAIC workers employed at FIFA World Cup 2022 stadiums in Qatar and all its other projects.***

***In addition to above, all SAIC workers are receiving their salaries through the official worker’s protection system (WPS), which allows workers to withdraw their monthly salaries from any ATM in Qatar.***

***Although we understand your concerns, we disapproved all the allegations mention in M/s Equidem findings report and reconfirm our continuous commitment and implementation of Worker’s Welfare as per (MOL) and (SC) standards and regulations.***<sup>5</sup>

4 Response from Advanced Construction Technology Service, via telephone to Mustafa Qadri, 24 October 2022.

5 “RE: M/s Equidem mail dated 24th October 2022,” via email to Equidem on October 31, 2022. Full response available in the Annex of this report.

SAIC also provided detailed responses to each allegation lodged by workers against them in this report. These responses are included in the body of the text and the Annex to this report.

Salini Impregilo responded:

***We have no doubt on the level of rights protection we offer to our workers, however we will read with extreme carefulness the report and - if necessary - carry out internal investigations to fully assesses the matter.***<sup>6</sup>

Equidem welcomes the opportunity to work with Salini Impregilo to investigate the allegations in this report and ensure that workers are adequately compensated.

Galfar Al Misnad responded:

***We officially refute these false claims regarding the company’s COVID management and its purported repercussions on labour and human rights of employees. We take safety very seriously at Galfar Al Misnad and were dismayed to hear of such an accusation.***<sup>7</sup>

Galfar Al Misnad also provided a detailed account of its COVID-19 health and safety protocols—a standard of care that we confirmed with workers employed by Galfar Al Misnad. These policies should be held up as an industry benchmark. Details of these measures by Galfar Al Misnad are included in the body of this report in a dedicated subsection entitled, “Good practices from Galfar Al Misnad.”

All of the responses are available in full on our website <https://equidem.org>.

6 “Re: Violations of Migrant Workers’ Labour and Human Rights at Salini Impregilo,” via email, October 31, 2022.”

7 “FW: Violations of Migrant Workers’ Labour and Human Rights at Galfar Al Misnad- Draft Response,” via email, October 25, 2022. Full response available in the Annex of this report.



# Summary of findings



**Table 1: FIFA World Cup Qatar 2022 Stadiums and Rights Violations**

STADIUM	RIGHTS VIOLATIONS
Al Bayt Stadium, Al Khor	<ul style="list-style-type: none"> <li>• Undermining Qatar independent inspections</li> <li>• Undermining salary guidelines</li> <li>• Physical abuse</li> <li>• Verbal abuse</li> <li>• Mental harm—threats, stress, and cultures of fear</li> <li>• Health and safety risks</li> <li>• Exposure to COVID-19</li> <li>• Health risks at labour camps</li> <li>• Nationality-based discrimination</li> <li>• Barriers to advancement</li> <li>• Wage theft (withheld wages, unpaid overtime, non-payment of severance)</li> <li>• Excessive work</li> <li>• Illegal recruitment (recruitment fees, deception in recruitment)</li> <li>• Holding worker passports</li> <li>• Inadequate systems for reporting rights violations</li> <li>• Retaliation for reporting rights violations</li> <li>• Inability to change employers</li> </ul>

<p>Al Janoub Stadium, Al Wakrah</p>	<ul style="list-style-type: none"> <li>• Nationality-based discrimination</li> <li>• Barriers to promotion and advancement</li> <li>• Mental harm—threats, stress, and cultures of fear</li> <li>• Health and safety risks</li> <li>• Exposure to COVID-19</li> <li>• Health risks at labour camps</li> <li>• Challenges accessing sick leave</li> <li>• Lack of health insurance</li> <li>• Illegal recruitment (recruitment fees)</li> <li>• Inability to change employers</li> <li>• Inadequate systems for addressing workplace rights violations and complaints</li> <li>• Retaliation for reporting rights violations</li> </ul>
<p>Ahmad Bin Ali Stadium, (“Al Rayyan Stadium”)</p>	<ul style="list-style-type: none"> <li>• Nationality-based discrimination</li> <li>• Wage theft (withheld wages)</li> <li>• Mental harm—threats, stress, and cultures of fear</li> <li>• Excessive work</li> <li>• Health and safety risks</li> <li>• Inadequate nutrition</li> <li>• Exposure to COVID-19 on worksite</li> <li>• Barriers to taking sick leave</li> <li>• Inability to change employers</li> <li>• Illegal recruitment (recruitment fees)</li> <li>• Exposure to COVID-19</li> <li>• Workers left without salary and food during lockdown</li> </ul>

<p><b>Al Thumama Stadium, Doha</b></p>	<ul style="list-style-type: none"> <li>• Nationality-based discrimination</li> <li>• Undermining FIFA and Supreme Committee for Delivery and Legacy Inspections</li> <li>• Wage theft (non-payment of wages)</li> <li>• Verbal abuse</li> <li>• Mental harm—threats, stress, and cultures of fear</li> <li>• Health and safety risks</li> <li>• Exposure to COVID-19 on site</li> <li>• Exposure to COVID-19 in worker accommodations</li> <li>• Illegal recruitment (recruitment fees, deception in recruitment)</li> <li>• Retaliation for reporting rights violations</li> <li>• Inability to change employers</li> </ul>
<p><b>Education City Stadium, Al Rayyan</b></p>	<ul style="list-style-type: none"> <li>• Nationality-based discrimination</li> <li>• Verbal abuse</li> <li>• Physical abuse</li> <li>• Wage theft (unpaid overtime)</li> <li>• Overwork</li> <li>• Illegal recruitment (recruitment fees)</li> <li>• Exposure to COVID-19</li> <li>• Workers left without salary and food during lockdown</li> <li>• Inability to change employers</li> </ul>
<p><b>Khalifa International Stadium, Al Rayyan</b></p>	<ul style="list-style-type: none"> <li>• Undermining salary guidelines</li> <li>• Nationality-based discrimination</li> <li>• Wage theft (unpaid overtime, non-payment of severance)</li> <li>• Excessive work</li> <li>• Mental harm—threats, stress, and cultures of fear</li> <li>• Barriers to advancement</li> <li>• Illegal recruitment (recruitment fees)</li> <li>• Health and safety risks</li> <li>• Exposure to COVID-19</li> <li>• Retaliation for reporting rights violations</li> <li>• Inability to change employers</li> </ul>

<p>Lusail Iconic Stadium, Lusail</p>	<ul style="list-style-type: none"> <li>• Worker deaths on site</li> <li>• Physical abuse</li> <li>• Verbal abuse</li> <li>• Mental harm—threats, stress, and cultures of fear</li> <li>• Undermining FIFA and Supreme Committee for Delivery and Legacy Inspections</li> <li>• Diminished compliance with inspections over time</li> <li>• Undermining salary guidelines</li> <li>• Nationality-based discrimination</li> <li>• Wage theft (unpaid wages, unpaid overtime, non-payment of severance)</li> <li>• Late payments</li> <li>• Excessive work</li> <li>• Illegal recruitment (recruitment fees, deception in recruitment)</li> <li>• Barriers to advancement</li> <li>• Health and safety risks</li> <li>• Exposure to COVID-19</li> <li>• Inadequate medical care for workers who contracted COVID-19</li> <li>• No health insurance</li> <li>• Overcrowded and unhygienic worker accommodations</li> <li>• Inadequate systems for addressing rights violations and workplace issues</li> <li>• Retaliation for reporting rights violations</li> <li>• Holding worker passports</li> <li>• Inability to change employers</li> </ul>
<p>Stadium 974/Ras Abu Aboud Stadium, Doha</p>	<ul style="list-style-type: none"> <li>• Illegal recruitment (recruitment fees)</li> </ul>

## Overwork in a Culture of Fear

Workers on FIFA World Cup Qatar 2022 stadiums described being made to work long hours under the constant fear that they would lose their jobs. This culture of fear is sustained through nationality-based discrimination and workplace violence—including physical, verbal, and mental abuse.



### Understaffing and overwork

Workers on Al Bayt, Ahmad Bin Ali (“Al Rayyan”), Education City, Khalifa, and Lusail Stadiums described understaffing and overwork. A Kenyan worker employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium described working fourteen-hour days without paid overtime for over two years:

*I worked for fourteen hours a day with a thirty-minute lunch break. We ate while standing. I had no time to catch my breath or rest during these long shifts. There was no overtime pay. Given the volume of work, they should have paid me much better.*<sup>8</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium also described an unmanageable workload despite more workers on his shift:

*There are eighteen workers per shift in this stadium. It is a venue for the FIFA World Cup 2022 with 40,000 seats capacity. It is not possible for us to control and manage this space during our duty time.*<sup>9</sup>

### Nationality-based discrimination

Equidem documented nationality-based discrimination at all eight FIFA World Cup Qatar 2022 stadiums—including discrimination in work assignments, wage discrimination, discriminatory treatment, and barriers to promotion and advancement. Migrant workers from Asia and Africa

are given the hardest jobs, longest hours, and the least pay. These deeply entrenched patterns of workplace discrimination dehumanize migrant workers and authorize inhuman treatment. An Indian construction worker employed by HBK on Lusail Stadium described discrimination in work assignments:

*Supervisors discriminate in hiring and assigning work. The work done at high altitude—in which labour is hard and risk is high—will not be given to a Qatari or an Arabic-speaking worker. Even if it is given to them, they can refuse. If the same work is given to us, we cannot refuse. If we refuse, our pay might be cut, but that doesn't happen with Qatari and Arabic - speaking workers.*<sup>10</sup>

While Qatar has a newly enacted non-discriminatory minimum wage, nationality-based wage discrimination flourishes above that wage floor. A Nepalese worker employed by HBK on Lusail Stadium reported discrimination in access to rest areas:

*In the summer season, it is very hot. The company provided rest shelters in some of the locations, but it is not enough space for all of us to take rest... Qatar nationals, Egyptian and Pakistani workers are provided air-conditioned rest areas by the company.*<sup>11</sup>

The Convention on the Elimination of All Forms of Racial Discrimination (CERD), which has been ratified by Qatar, expressly prohibits state exclusion based on national origin that nullifies or impairs human rights. Nevertheless, nationality-based wage discrimination

8 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

9 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

10 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

11 A Nepalese worker employed by Hamad Bin Khalid Contracting Company (HBK) at Lusail Stadium, interviewed in Qatar, July 2022.

in construction, maintenance and security sectors in Qatar is widespread, systematic, and carried out in plain sight. FIFA should have taken immediate action to address these predictable risks by contractors, including by adopting non-discrimination policies that require wage scales based on job requirements, rather than on workers’ nationality or migration status.

## Workplace violence

Workers who take even short breaks to rest, drink water, or use the toilet faced routine verbal abuse, threats of termination, and even physical violence. This treatment targets migrant workers who are driven to meet production targets under highly stressful conditions.

## Physical violence



Workers on Al Bayt, Education City, and Lusail Stadiums described physical violence on their worksites. A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL (J&P)—on Education City Stadium, described physical violence on the construction site:

***One time I saw the supervisor of J&P pick up a wooden block to hit the mason. He was angry because the mason did not complete his work on time.***<sup>12</sup>

A Kenyan worker employed by HBK on Lusail Stadium described routine physical violence with no avenue for relief:

***Supervisors would hit us in front of other workers to pressure us to work faster and complete our work on time. This physical abuse was never***

***addressed. You could report but nothing would happen because the perpetrators were our supervisors.***<sup>13</sup>

Physical violence was commonly reported by workers employed by HBK on Lusail Stadium.

## Verbal abuse

Migrant workers on Al Bayt, Education City, Lusail, and Al Thumama Stadiums all described verbal abuse at work. An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, described routine verbal abuse from supervisors:

***The supervisors here are very rude. They shout and abuse when workers drink water and go to the toilet. This is a daily, common thing. Workers can't rest for even two minutes on duty. If you are found resting, you hear abuses. This has happened to me many times.***<sup>14</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium described routine verbal abuse:

***If we do not complete our work on time, the supervisors yell at us. They threaten to cut our overtime. Yelling is common. We are used to it.***<sup>15</sup>

## Mental harm, stress, and suffering—threats and cultures of fear

Workers on Al Bayt, Al Janoub, Al Thumama, Al Rayyan, Lusail, and Khalifa Stadiums all described high levels of stress associated with regular workplace threats—including threats that their salaries would be cut or that they would lose their jobs. A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium described receiving threats from his supervisor for resting:

12 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

13 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

14 An Indian worker employed by HBK Contracting on Al Bayt Stadium, interviewed in Qatar, August 2022.

15 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.



**Once when I was at work, I got very tired and needed to take a break. The camp boss came up to me and threatened to cut my salary for two days. He even threatened to send me back home.<sup>16</sup>**

An Indian worker employed as an electrician by HBK on Lusail Stadium, also described psychological consequences of working in this environment:

**The job and environment cause mental pain. There is always a feeling of tension and exhaustion in our minds and bodies.<sup>17</sup>**

## Wage theft

Construction, maintenance, and security workers employed on FIFA World Cup Qatar 2022 stadiums reported wage theft. Some workers received no wages and benefits or smaller wages and fewer benefits than they were owed. Some had their salaries unilaterally cut 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. Workers on Al Bayt, Al Rayyan, Al Thumama, Education City, Khalifa, and Lusail Stadiums described wage theft. A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums described extended working hours without overtime pay:

**I worked 14 hours a day, from six am to eight pm. I did not get any overtime payment. Overtime payment was promised at 1.8%, but I never received it. I worked seven days a week. Any time they called me, I would have to go.<sup>18</sup>**



A Bangladeshi worker employed by Salini Impregilo Group on Al Bayt and Khalifa International Stadiums reported company measures to sidestep end of service entitlements:

**The company never fires anyone, but when a worker is forced to leave the country due to irregular pay and various other difficulties, the company doesn't give a real account. If someone wants to file a lawsuit in the Labor Court, they are told in various ways that it will take a long time to file a lawsuit, so take what we give you.<sup>19</sup>**

16 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

17 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

18 A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums, interviewed in Qatar, May 2022.

19 A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

## Illegal recruitment



Workers described obtaining jobs based upon illegal recruitment practices—including promises of higher salaries and different working conditions than they experienced when they reached Qatar. All 60 of the workers interviewed by Equidem for this report—including migrant workers employed on all eight FIFA World Cup Qatar 2022 stadiums—described paying illegal recruitment fees, ranging from USD 99 to USD 4,500. On average, workers paid USD 1,874 in recruitment fees. A Bangladeshi worker employed by Advanced Construction Technology Services at Al Bayt, Khalifa, and Lusail Stadiums—described the stress associated with high recruitment fees:

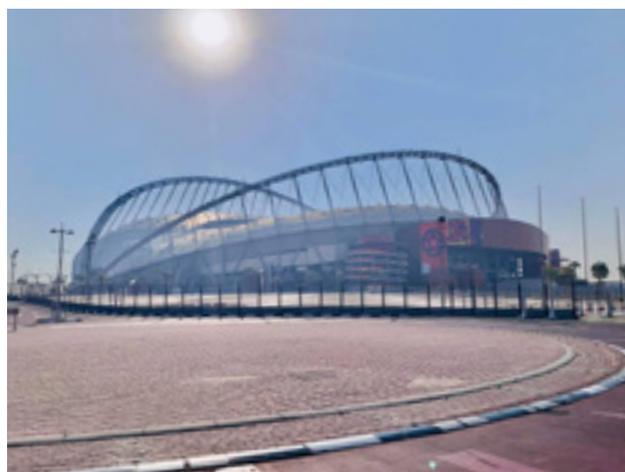
*I took the recruitment fees from my family. I was so determined to pay back that 3 lakhs taka (3,00,000 BDT/2,899 USD) in one year, and I did it. I worked so much in the first year that it is unimaginable. I was constantly thinking, how can I earn more to pay back my family. I used to do overtime work 7 days in a week. I would work 87-98 hours in a week.<sup>20</sup>*

Workers employed by HBK on Lusail Stadium also reported a company practice of paying salaries lower than the salary promised to workers at the time of recruitment. A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium reported wages lower than what he was promised at the time of recruitment:

*I was told that I would get 1,200 rials (\$329.56) as my basic salary, but when I came here, they took my oral interview instead of a practical interview and told me that I was not qualified. They decreased my salary.<sup>21</sup>*

## Health and Safety Risks

Migrant construction workers and security guards employed on FIFA World Cup Qatar 2022 stadiums described working in excessive heat, cold, dust, and through the COVID-19 pandemic outbreak. Despite the extreme risks to their health and safety posed by these conditions, workers reported that they were not given sick leave and forced to work through sickness and exhaustion under threats of termination. Workers who contracted COVID-19 were quarantined until they were no longer contagious, and then made to return to work immediately.



Migrant workers employed on FIFA World Cup Qatar 2022 stadiums were exposed to excessive heat, cold, dust, and the COVID-19 pandemic outbreak. © Equidem 2022

20 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

21 Nepalese worker employed as a scaffolder by Hamad Bin Khalid Contracting Company WLL (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

## Occupational injuries—worker deaths



Workers employed by HBK on Lusail Stadium described two worker deaths:

*In March 2019, one Bangladeshi national died while working at the Lusail stadium. It was only a few days after I started working there. He fell from level 5 to the ground floor. Hearing about such an incident, to know that a person died right before you, it made me nervous. I always checked my belt, its expiry date. I was cautious at my work.*

*I do not remember the date, but it must be 2021. Another Chinese national died on the site at Lusail stadium. He fell from a height, of around 25 meters. We heard people saying that none of his body parts [hands/feet] were moving/working at the time. He was taken to a hospital, and he died later. We heard that his belt unfastened which led to the fall.<sup>22</sup>*

### Extreme heat, cold, and dust

Workers on Al Bayt, Al Janoub, Al Rayyan, Lusail, and Khalifa Stadiums all described health consequences associated with working in extreme weather conditions, at times without access to shelter and water. A Bangladeshi worker who maintains turf grass at Al Janoub Stadium—employed by the contractor, Al Sulaiteen Agricultural and Industrial Complex—described health risks associated with maintaining turf grass:

*There are health and safety risks in maintaining the grass. We worked outside as landscapers through the summer, and it’s much too hot. In the*

*winter, it is very cold with heavy winds. This is an empty desert area, so there are heavy winds and a lot of dust. This has an impact on our health.<sup>23</sup>*

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium also described extreme temperatures:

*We did our duty for one year and six months outside the stadium premises. During the summer time, from April to August, in Qatar, the temperature is 45 to 55 degrees outside. We did our duty with no cabin and not even a sun sheet. On the other hand, in the winter season, from September to March, it is cold with heavy wind. The company forced us to be outside to do our work.<sup>24</sup>*

An Indian worker employed as an electrician by HBK on Lusail Stadium described challenges getting adequate drinking water:

*There is no good facility for drinking water here. Now water coolers have been installed but before there was a plastic bucket that was filled with ice. The ice would melt slowly. This prevented the workers from drinking too much.<sup>25</sup>*

### Exposure to COVID-19

Equidem found that on all FIFA World Cup Qatar 2022 stadiums, construction, maintenance, and security companies 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.<sup>26</sup>

22 A Nepalese worker employed by Hamad Bin Khalid Engineering Company WLL (HBK) at Lusail Stadium, interviewed in Qatar, July 2022.

23 A Bangladeshi worker who maintains turf grass at Al Janoub Stadium, employed by Al Sulaiteen Agricultural and Industrial Complex, interviewed in Qatar, May 2022.

24 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

25 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

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

## Inability to take sick leave

A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium described being threatened with termination for seeking sick leave:

*I have been threatened that I would lose my job for taking sick leave. If our health is not good and we request to take sick leave or take rest, our senior gives us a warning letter. I have also been threatened verbally that he will terminate me.*<sup>27</sup>

Challenges taking sick leave were not limited to workers at Midmac but were commonly reported across contractors working on FIFA World Cup Qatar 2022 stadiums.

## Inadequate nutrition

Occupational health and safety risks may be exacerbated by poor nutrition. A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadiums described receiving food from his employer that was inadequate to meet his nutritional needs. When he complained he was threatened with termination:

*The company provides us with food and subtracts it from our salary. We pay 300 rials (\$82) a month for food, but the company provides us with cheaper and less caloric food every day. When we complained about this problem, they threatened to terminate us.*<sup>28</sup>

## No Avenue Out – Creating a Captive Workforce



Workers described having no pathways to seek relief for discriminatory and exploitative working conditions.

### Inadequate inspections processes by FIFA and Supreme Committee for Delivery and Legacy

As described in Part 3 of this report, despite ongoing inspections by FIFA and the Supreme Committee for Delivery and Legacy, workers described being unable to bring their issues to inspectors. Workers described being moved off site during inspections. An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, described being moved to alternate sites or sent back to the work camp on days when independent inspections were planned:

*The investigation team came every month, but we could not meet the FIFA or Supreme Committee*

*Team because our workplace would be changed before they arrived. On the days where there is talk of inspection, we were sent elsewhere for duty or sent to the camp. A company staff stood at the stadium gate and when the FIFA or Supreme Committee people came, he would inform our supervisors. Company officials gave us strict instructions that we should not go to the FIFA team with any complaints. We were told that strict action would be taken against anyone who complains.*<sup>29</sup>

Moreover, workers described fearing retaliation if they approached officials during inspections. An Indian worker employed as an electrician by HBK on Lusail Stadium, reported fear among migrant workers that kept them from reporting to officials when they made site visits:

*No one speaks in front of the officials because many people have been fired from their jobs or sent on forced leave and not called back. We do not protest because we are afraid of losing our jobs. Apart from threatening and abusing the rest of the workers*

27 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

28 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, April 2022.

29 An Indian worker employed as a helper in the stone cutting section, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

***when a complaint is filed, they show that workers who complain will have a police case filed against them and may even be sent to jail.***<sup>30</sup>

Workers also described a practice by employers of sharing wage records during inspections that do not represent the actual wages paid to workers. A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—reported a company practice of paying wages lower than the contractually promised rate, and misrepresenting salaries in company books:

***I only received overtime my first year. After that they refused to give overtime and began deducting from our wages for different reasons. We ended up getting less than what was written in our contracts. When government inspections took place, they showed them salary books that showed that they were paying us properly for overtime and other extras.***<sup>31</sup>

## Retaliation for reporting rights violations

Workers who report violations face extreme retaliation – verbal and physical abuse and harassment, increased workloads, termination, and police cases. A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums described being fired for speaking out against rights violations:

***I faced a lot of violations. I did not get overtime pay for compulsory overtime, I did not get sick or annual leave. I did not get a promotion. We have nowhere to report these violations. When I spoke out against this injustice, they fired me.***<sup>32</sup>

An Indian construction worker employed by HBK on Lusail Stadium also described the types of retaliation workers face for speaking out against abuse:

***If we protest, they threaten to cut our salaries or they fire us. Supervisors shout, abuse, and sometimes even beat workers. This is why no one protests. If I complain I will be abused, threatened with dismissal, and the duty will be made stricter for me.***<sup>33</sup>

## Inability to leave employer and seek alternate employment

Workers employed by FIFA World Cup Qatar 2022 construction sites described barriers to changing employers, despite recent changes to Qatar law for that very purpose. 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. A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium described being prevented by his employer from changing jobs:

***I tried to change my company and move to another company where I would earn a higher salary and get more benefits. It is my right to change employers but they refused to give me a promotion and they won't let me leave.***

A Nepalese worker employed by HBK on Lusail Stadium described the challenges he faced in changing jobs:

***Someone from the HR Department came to me and said that I could not change my job. He threatened that they will not renew my ID and make me illegal. After that I signed a paper to renew the ID. Up to 4 months, they did not renew my ID. Before that, for two years, my ID was always renewed on time.***<sup>34</sup>

30 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

31 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

32 A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums, interviewed in Qatar, May 2022.

33 An Indian construction worker employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022.

34 A Nepalese worker employed by Hamad Bin Khalid Engineering Company WLL (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

### Good practices

Nineteen of the 60 workers interviewed by Equidem at length described at least one instance of good labour practices by their employer. Four workers, one each from Al Jaber Engineering WLL and Midmac Contracting Co. WLL, and two from Larsen & Toubro, said their employer had adequate channels for reporting concerns with working conditions, particularly with respect to occupational health and safety. Two workers, one from Al Jaber Trading & Contracting Co., the other from Salini Impregilo Group, reported being adequately compensated for hours of overtime work on stadium construction sites. Good access to employer provided healthcare was consistently reported by workers employed by construction firms Galfar Al Misnad and Salini Impregilo Group. Workers from IMAR Trading & Contracting Co WLL, Joannou & Paraskevaides Qatar WLL and Larsen & Toubro mentioned good occupational health and safety practices, including adequate safety measures on work sites and regular water and washroom breaks. A worker from IMAR Trading & Contracting Co WLL said he received paid sick leave and that he was satisfied with the company’s safety precautions for COVID-19. A worker from Gulf Contracting Company WLL described significant precautions being taken to mitigate the risks of infection from COVID-19 at accommodation and working sites. Al Jaber Engineering WLL, Galfar Al Misnad, Midmac Contracting Co. WLL, and Salini Impregilo workers said they were housed in decent living conditions. Workers from Larsen & Toubro, Midmac Contracting Co. WLL, and Salini Impregilo Group described good practices by the company to support workers in transitioning to new roles.

Despite these good practices, all 60 of the interviewed workers described multiple experiences of labour exploitation that include practices that are forced labour indicators.



### Qatar and FIFA’s efforts to respect workers’ rights

Qatar has made several changes in law and practice to improve labour protections following its 2010 selection as host of the 2022 FIFA World Cup. These reforms have blunted some of the harshest features of the country’s previous kafala foreign labour system.



#### Labour reforms in Qatar<sup>35</sup>

- Qatar Visa Centres in workers countries of origin to improve recruitment protections
- Removing the requirement that workers must seek their employer’s permission to change jobs or leave the country
- Increasing labour law protection for domestic workers
- Establishment of labour dispute committees to enable quicker and better enforcement of legal protections
- Creating a non-discriminatory minimum wage
- Setting up a fund to compensate workers for unpaid wages and benefits
- Creation of joint employer-worker committees at 40 business enterprises across the country
- Passage of laws and standards to prohibit outdoor work during periods of extreme weather

35 “Overview of Qatar’s labour reforms”, International Labour Organisation, undated, available online at: [https://www.ilo.org/beirut/countries/qatar/WCMS\\_760466/lang--en/index.htm](https://www.ilo.org/beirut/countries/qatar/WCMS_760466/lang--en/index.htm).

FIFA and the Supreme Committee for Delivery and Legacy, the local body responsible for the delivery of the World Cup, have established measures to enhance existing labour protections in Qatar. Although FIFA provides overall oversight of respect for human rights responsibilities with respect to tournament project sites,<sup>36</sup> in practice the Supreme Committee is responsible for the implementation of labour protection measures. This includes the Supreme Committee’s “Worker Welfare Standards,” mandatory principles on workforce health, safety, wellbeing, security and employment conditions that apply to all businesses involved in World Cup projects.<sup>37</sup> The Building and Wood Workers’ International, a global union federation, have also been involved in stadium construction site inspections and technical support. The Supreme Committee for Delivery and Legacy also established Worker Welfare Forums consisting of elected representatives of major construction partners’ workforces to create a safe environment for workers to raise matters of concern without fear of reprisal.<sup>38</sup> The Supreme Committee reports receiving 1,207 cases through this system from the 30,000

workers they estimate have been employed across FIFA World Cup Qatar 2022 sites<sup>39</sup>—confirming, at best, that 4% of workers on FIFA World Cup Qatar 2022 made use of these mechanisms. According to our research, widespread fear of retaliation prevents workers from reporting rights violations. The Forums were disbanded once tournament stadium construction projects came to an end.

### Conclusion

Qatar and FIFA have spent \$229 billion on preparations for the World Cup.<sup>40</sup> They and their partners are estimated to accrue profits of up to \$17 billion from the tournament.<sup>41</sup> Yet the migrant workers who built the stadiums and made the event possible have lost wages, livelihoods and some have even lost their lives. According to a UN special rapporteur’s April 2020 findings—well known by FIFA and cited in the closing report of the FIFA Human Rights Advisory Board:

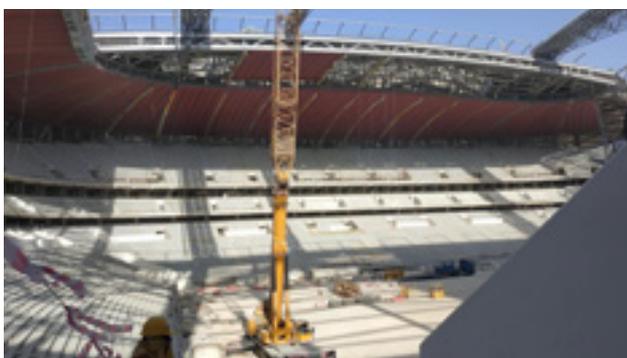
***“[Qatar has a] de facto caste system based on national origin, which results in structural discrimination against non-citizens, including as the result of immense power imbalances between employers and migrant workers.”<sup>42</sup>***



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- 36 For a detailed overview of FIFA’s human rights responsibilities with regard to the FIFA World Cup Qatar 2022 see: “Predictable and preventable: why FIFA and Qatar should remedy abuses behind the 2022 World Cup,” Amnesty International, May 19, 2022, available online at: <https://www.amnesty.org/en/documents/mde22/5586/2022/en/>.
- 37 Worker Welfare website, Supreme Committee for Delivery and Legacy, available online at: <https://www.workerswelfare.qa/en/workers-welfare>.
- 38 “Workers Welfare Forums”, Workers’ Voice, Supreme Committee for Delivery and Legacy, May 2022, available online at: <https://www.workerswelfare.qa/en/our-legacy/workers-voice>.
- 39 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.
- 40 Brittany Stephanis, “The true cost of the Qatar 2022 World Cup,” Business Insider, October 26, 2022, available online at: <https://www.businessinsider.com/true-cost-of-the-qatar-world-cup-2022-10?r=US&IR=T#:~:text=Qatar%20reportedly%20spent%20over%20%24229,project%20in%20World%20Cup%20history>.
- 41 Simone Foxman and Netty Idayu Ismail, “Football World Cup to Add Up to \$17 Billion to Qatari Economy”, Bloomberg, June 22, 2022, available online at: <https://www.bloomberg.com/news/articles/2022-06-22/soccer-world-cup-to-add-up-to-17-billion-to-qatari-economy?leadSource=verify%20wall>.
- 42 Fifth Report by the FIFA Human Rights Advisory Board, February 2021, available online at: <https://digitalhub.fifa.com/m/4769eb55b4e22ba5/original/vforeiez1fh06ld4a36-pdf>.

Persistent and widespread labour rights violations, work extracted through the menace of penalty, and flagrant evasion of labour inspections are a predictable result of the policies of the State of Qatar. These include denying workers their right to associate, permitting discrimination in recruitment and employment based on nationality and migration status, and significant surveillance of workers and threats of reprisals from the state and employers for speaking about labour conditions. These practices are used by employers to create a captive and controllable workforce and appear to be entrenched. This hostile environment for migrants, on top of a steep power imbalance between workers and employers, heavily undermines Qatar and FIFA’s rights protection initiatives. Whether intended, or otherwise, the fact that such widespread labour abuse persists on worksites so heavily regulated by Qatar, FIFA and their partners, suggests that the reforms undertaken over the last five years have acted as cover for powerful businesses that seek to exploit migrant workers with impunity.



Despite labour reforms, Qatar has retained policies that entrench immense power imbalances between migrant workers and employers. Al Bayt Stadium 2018. © name withheld on request 2018

Qatar can only hope to address the rights violations documented in this report if it enshrines the fundamental rights to associate, organise, and bargain collectively. These rights are the cornerstone on which real reform must rest. 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. 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 their independence, 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. The Worker Welfare Forums established by the Supreme Committee at stadium construction sites could have been enhanced to create a safe environment for workers to raise matters of concern without fear of reprisal.<sup>43</sup> But the forums were regrettably not expanded by Qatar authorities once tournament stadium construction projects came to an end. 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.

More than one million fans and tourists are anticipated at the FIFA World Cup Qatar 2022. Without urgent commitments from the Qatar government to compensate workers for harms caused on tournament projects and establish an independent Migrant Worker Centre, the FIFA World Cup Qatar 2022 will leave a legacy of exploitation and unfilled promises.

43 “Workers Welfare Forums”, Workers’ Voice, Supreme Committee for Delivery and Legacy, May 2022, available online at: <https://www.workerswelfare.qa/en/our-legacy/workers-voice>.

## Recommendations - Urgent Action Needed to Protect Labour Rights on FIFA World Cup Qatar 2022 Stadiums

### A. Compensate rights violations perpetrated on FIFA World Cup Qatar 2022 Stadiums

Conduct a comprehensive, independent assessment of the range of rights violations workers faced on FIFA World Cup Qatar 2022 Stadiums and establish a mechanism to compensate all workers and their survivors for these harms.

### B. Call for Immediate Action from all business actors engaged in FIFA World Cup Qatar 2022 stadium construction, maintenance, and security

#### Recommendations for business actors in the construction, maintenance, and security sectors

- Recommendations for construction lead firms
  - Require contractors to affirmatively demonstrate compliance with international labour standards, especially in areas with high risks of violation.
    - Require employers to produce proof of wages paid timely and in full through WPS documentation of transfers. Paperwork signed by workers confirming wages can be easily falsified.
    - Require that employers produce and enforce transparent salary grades through evidence-based and objective criteria. Where national governments established skill-based salary grades, companies should demonstrate enforcement through contracts and corresponding WPS payments. Where national governments have not established salary grades based upon skill level, the multinational company should establish and enforce skill-based salary standards determined by country.

- Contribute to emergency funds, and require contributions from subcontractors, that are sufficient to support
  - contractually owed wages for all workers regardless of employment status for at least three months while they serve notice of termination
  - severance pay
  - relocation costs
  - health insurance for workers who face sudden termination during health emergencies Establish health standards for employer provided housing, including ample space for social distancing and access to PPE.

#### Recommendations for Investors

- Make it a condition of investment that all companies receiving funds demonstrate compliance with international labour standards, especially in areas with high risks of violation.
  - Require employers to produce proof of wages paid timely and in full through WPS documentation of transfers. Paperwork signed by workers confirming wages can be easily falsified.
  - Require that employers produce and enforce transparent salary grades through evidence-based and objective criteria. Where national governments established skill-based salary grades, companies should demonstrate enforcement through contracts and corresponding WPS payments. Where national governments have not established salary grades based upon skill level, the multinational company should establish and enforce skill-based salary standards determined by country.

- Make it a condition of investment that all companies receiving funds demonstrate contribution to emergency funds, and require contributions from subcontractors, that are sufficient to support
    - contractually owed wages for all workers regardless of employment status for at least three months while they serve notice of termination
    - severance pay
    - relocation costs
  - Make it a condition of investment that companies establish and enforce health standards for employer provided housing, including ample space for social distancing and access to PPE.
2. Call on the Qatar authorities to support the establishment of a genuinely independent Migrant Worker Centre
  3. 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

### **C. Call for Immediate Action and Long-term Reform from Qatar**

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

The Supreme Committee should ensure that planned labour rights inspections include the following:

- 1.1. Processes for identifying and remediating worker deaths, nationality-based discrimination, wage theft, illegal recruitment, forced labour, overwork, workplace violence, health and safety risks, and practices used by employers to create a captive and controllable workforce
- 1.2. Engagement with migrant workers in a manner that enables workers to share their concerns while protecting workers’ privacy and safeguarding workers from retaliation

# Methodology



Al Thumama stadium, a venue for FIFA World Cup Qatar 2022, being built in 2019. © name withheld on request 2019

The research for this report was conducted between September 2020 and October 2022 in Qatar and in countries of origin—including, Bangladesh, India, Nepal, and Kenya, and Uganda. The time frame of this study provides insight into the experiences of migrant construction workers employed on stadium construction sites between 2014 and 2022—the eight years spent in construction leading up to the FIFA World Cup Qatar 2022, and at various stages of the ongoing global COVID-19 pandemic. Our investigation includes the experiences of 60 migrant workers across all eight FIFA World Cup Qatar 2022 stadiums—Lusail Iconic Stadium in Lusail, Al Bayt Stadium in Al Khor, Al Janoub Stadium in Al Wakrah, Ahmad Bin Ali Stadium in Al Rayyan, Khalifa International Stadium and Education City Stadium in Al Rayyan and Stadium 974 and Al Thumama Stadium in Doha (Table 1). Together, these stadiums employed over 30,000 migrant workers.<sup>44</sup>

Migrant worker interviews were carried out on a one-to-one basis in line with social distancing and other COVID-19 guidelines set by authorities in these countries and the World Health Organization (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. Worker testimony has been recorded exactly as they spoke to Equidem researchers during interviews, and we took every effort to corroborate their claims against those of other workers and sources of information before publishing it in this report. In some instances, workers referred to labour inspections by the Government of Qatar or FIFA which may have been undertaken by third parties, such as auditors or technical advisors. Notwithstanding this, we have opted to retain the descriptions of these inspections given the significant evidentiary value of this testimony.



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 982 migrant workers employed on FIFA World Cup 2022 stadiums in Qatar. While 60 workers agreed to have their experiences recorded, most refused due to fear of retaliation. In light of 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 duty of care policy and procedures. All of the workers interviewed requested that their identity not be revealed. Accordingly, we have not used any names in the report in order to shield workers from the risk of retaliation from their employers or the state. Worker references to money, for example with regard to salaries and recruitment charges, have been converted into US dollars.



44 Supreme Committee for Delivery and Legacy, Workers' Welfare, accessed online on October 19, 2022, <https://www.workerswelfare.qa/en/workers-welfare>.

**Table 2: FIFA World Cup Qatar 2022 stadiums investigated**

COUNTRY	FIFA WORLD CUP QATAR 2022 STADIUMS INVESTIGATED	NUMBER OF WORKERS INTERVIEWED
 <p><b>Qatar</b></p>	Al Bayt Stadium, Al Khor	 <p><b>60</b></p>
	Al Janoub Stadium, Al Wakrah	
	Ahmad Bin Ali Stadium, Al Rayyan	
	Al Thumama Stadium, Doha	
	Education City Stadium, Al Rayyan	
	Khalifa International Stadium, Al Rayyan	
	Lusail Iconic Stadium, Lusail	
Stadium 974/Ras Abu Aboud Stadium, Doha		

**Table 3: Contractors investigated by Stadium**

STADIUM	CONTRACTOR
Al Bayt Stadium, Al Khor	<ul style="list-style-type: none"> <li>Advanced Construction Technology Services</li> <li>Al Sraiya Security Services Qatar WLL</li> <li>Galfar Al Misnad</li> <li>Hamad Bin Khalid Contracting Company WLL</li> <li>IMAR Trading &amp; Contracting Co WLL</li> <li>Salini Impregilo (renamed as Webuild)</li> </ul>
Al Janoub Stadium, Al Wakrah	<ul style="list-style-type: none"> <li>Al Sraiya Security Services Qatar WLL</li> <li>IMAR Trading &amp; Contracting Co WLL</li> <li>Six Construct Qatar</li> <li>Midmac Trading and Contracting</li> <li>Al Sulaiteen Agricultural and Industrial Complex</li> </ul>
Ahmad Bin Ali Stadium, Al Rayyan	<ul style="list-style-type: none"> <li>Al Sraiya Security Services Qatar WLL</li> <li>Advanced Construction Technology Services</li> <li>Gulf Contracting Company WLL</li> <li>Larsen and Toubro</li> </ul>
Al Thumama Stadium, Doha	<ul style="list-style-type: none"> <li>Al Jaber Engineering WLL</li> <li>IMAR Trading &amp; Contracting Co WLL</li> <li>Land Worx Construction</li> </ul>
Education City Stadium, Al Rayyan	<ul style="list-style-type: none"> <li>Advanced Construction Technology Services</li> <li>Joannou &amp; Paraskevides Qatar WLL</li> <li>Pigeon Engineering Projects, Trading &amp; General Services</li> <li>Salfo Engineering and Management Consultants</li> </ul>

Khalifa International Stadium, Al Rayyan	<ul style="list-style-type: none"> <li>• Advanced Construction Technology Services</li> <li>• Salini Impregilo (renamed as Webuild)</li> </ul>
Lusail Iconic Stadium, Lusail	<ul style="list-style-type: none"> <li>• Advanced Construction Technology Services</li> <li>• Al Sraiya Security Services Qatar WLL</li> <li>• Al Jaber Trading &amp; Contracting Co.</li> <li>• Hamad Bin Khalid Contracting Company WLL</li> <li>• IMAR Trading &amp; Contracting Co WLL</li> <li>• Land Worx Construction</li> <li>• Pigeon Engineering Projects, Trading &amp; General Services</li> </ul>
Stadium 974/Ras Abu Aboud Stadium, Doha	<ul style="list-style-type: none"> <li>• Regency Security Services</li> </ul>



In 2017 FIFA appointed a Human Rights Advisory Board, only to disband it in December 2020.

While research and documentation of labour and human rights violations often focuses exclusively on documenting violations, our research protocol sought to identify violations in relationship to employment practices. Accordingly, interviews focused on not only understanding the experiences of individual workers, but also employment practices on the construction sites 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 construction sector (Table 3).

**Table 4: Range of respondent occupations within the construction sector**

DEPARTMENT	ROLE
Grounds maintenance	<ul style="list-style-type: none"> <li>• Gardener</li> </ul>
Site-based construction workers	<ul style="list-style-type: none"> <li>• Engineer</li> <li>• Rigger (moving material by crane and signal)</li> <li>• Construction Supervisor</li> <li>• Construction Worker</li> <li>• General Labourer</li> <li>• Carpenter</li> <li>• Carpenter’s helper</li> <li>• Painter</li> <li>• Cleaner</li> </ul>

Site-based construction workers	<ul style="list-style-type: none"> <li>• Plumber</li> <li>• Assistant Storekeeper</li> <li>• Roofer</li> <li>• Scaffolder</li> <li>• Mason</li> <li>• Mason’s Helper</li> <li>• Helper, Stone Cutting Section</li> <li>• Steel fixer</li> </ul>
Office	<ul style="list-style-type: none"> <li>• Office Administrator</li> <li>• Digital Print Designer</li> </ul>
Health and safety workers	<ul style="list-style-type: none"> <li>• Health and Safety Officer</li> <li>• Fire and Safety Officer</li> <li>• Safety Assistant Worker</li> </ul>
Lab workers and technicians	<ul style="list-style-type: none"> <li>• Concrete Technician</li> <li>• Lab Technician</li> </ul>
Quality control	<ul style="list-style-type: none"> <li>• Quality Control Assistant</li> <li>• Scaffolding Inspector</li> </ul>
Security	<ul style="list-style-type: none"> <li>• Security, Registered Access and Control</li> </ul>

# Part 1: FIFA Commitments to Labour and Human Rights

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 workers<sup>45</sup> and restrictions on wider civil and political rights in Qatar,<sup>46</sup> FIFA’s selection process did not include any human rights assessments.<sup>47</sup>

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 organized sustained campaigns to pressure FIFA into addressing practices that have resulted in dangerous, exploitative jobs. In 2016,

45 Amnesty International Report 2021/22, p. 306, available online at: <https://www.amnesty.org/en/location/middle-east-and-north-africa/qatar/report-qatar/>.

46 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>.

47 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/>.

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.<sup>48</sup>

## FIFA Human Rights Advisory Board

Acting toward realizing this human rights requirement, 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 policy commitment, embedding it throughout the organization, identifying and addressing human rights risks, tracking and

reporting on implementation, and enabling access to remedy. The 2017 report includes 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, 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) there is an ongoing need for independent evaluation of FIFA’s human rights efforts through the entire life cycle of the FIFA World Cup Qatar 2022.

## 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 the delivery of the infrastructure and host country planning and operations for Qatar to host the 2022 FIFA World Cup.<sup>49</sup> The Supreme Committee 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.<sup>50</sup> As explained by the Supreme Committee, Worker Welfare Standards are embedded in the tendering process, including pre-mobilization processes for subcontractors, and are contractually binding.<sup>51</sup>

The Supreme Committee has struggled to ensure significant compliance with its Worker Welfare Standards over the course of World Cup

48 FIFA, “Guide to the Bidding Process for the FIFA World Cup”, available online at: <https://digitalhub.fifa.com/m/5730ee56c15eeddb/original/hgopyqftviladnm7q90-pdf.pdf>.

49 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/>.

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

51 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

preparations, as highlighted in investigations by human rights groups and journalists.<sup>52</sup> But in a September 2018 report, FIFA’s Human Rights Advisory Board<sup>53</sup> 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 in Supreme Committee incident investigation in cases of injuries and fatalities, issues of distinct wage levels by nationality, and 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. 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 antidiscrimination.<sup>54</sup>

## Part 2: Risk Factors for Human and Labour Rights Violations in Qatar

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 that ensure that during construction of FIFA World Cup Qatar 2022 stadiums, contractors have access to a hiring pool of migrant workers,

52 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/>.

53 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>.

54 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/ab2ywfct8qle92nghiee-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>.

while systematically excluding these workers from adequate labour, employment, and social protections. This ecosystem poses significant risks for unchecked rights abuses, including worker deaths, nationality-based discrimination, wage theft, illegal recruitment, forced labour, overwork, workplace violence, health and safety risks, and practices used by employers to create a captive and controllable workforce.

As outlined in this section, risk factors for labour and human rights abuses in FIFA World Cup Qatar 2022 stadium construction sites include widespread employment of migrant workers in temporary positions, where workers are subjected to employer control without adequate labour standards protections, including the freedom of association protections required to enforce labour standards.

## Migrant Status as a Risk Factor for Abuse

Leading up to the FIFA World Cup Qatar 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 migrant workers as particularly vulnerable to human rights abuse. These vulnerabilities are caused by longstanding migration and employment policies and practices. In Qatar, as oil prices fell in the 1980s, countries cut private sector costs by substituting Arab workers for migrant workers.<sup>55</sup> 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 more compliant workforce that is particularly vulnerable to labour and human rights violations.<sup>56</sup>

Migrant workers in the construction sector also face these risks. During the 1970s, the construction industry became well established as a major employer for migrant workers from Bangladesh, India, Nepal, and Pakistan.<sup>57</sup> However, because of workforce nationalization efforts and diversification policies, an increasingly diverse pool of migrant

workers now find employment in the construction sector in Qatar. In recent years, employers in Qatar and other GCC countries have increasingly focused on diversifying the Asian workforce by hiring African workers.<sup>58</sup> 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.<sup>59</sup>

In light of these conditions and widespread documentation of risks facing migrant workers, the Human Rights Advisory Board has 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 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.

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

56 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>.

57 Chowdhury and Rajan, *South Asian migration in the Gulf*, 165.

58 Ibid.

59 Ibid.

## 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. The Qatar National Vision 2030 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.<sup>60</sup>

This blueprint to economic development depends upon migrant labour because local workforces are insufficient to meet the development blueprint. To activate the National Vision Plan, Qatar has advanced policies to establish a ready migrant

workforce that can be hired and fired by employers at will, in line with the surges and dips in the market demand for labour. In this context, market dominant Qatari nationals are legally set up to wield significant levels of control over migrant wage workers through labour market deregulation and the kafala 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.<sup>61</sup> Migrant workers have no pathway to inclusion within Qatar as citizens, and instead hold a contingent status with substantially less labour protections and access to state social protection than those of nationals.

## 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.

In Qatar and across the GCC countries, migrant workers gain entry and permission to work under kafala programs. 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). 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 this report shows, this imbalanced power dynamic in favour of the employer over the worker<sup>62</sup> continues to undermine the ability of large numbers of workers to exercise labour rights and address labour exploitation, despite initiatives

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

61 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/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms\\_552697.pdf](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_552697.pdf).

62 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/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms\\_552697.pdf](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_552697.pdf).

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 with frequency and impunity.

### **Labour Reforms in Qatar Facilitating Migrant Worker Mobility Between Employers**

Qatar has 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.

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, will 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 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.

Equidem acknowledges 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 helpfully supplement the Qatar authorities’ own labour protection and remediation efforts.

### **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.<sup>63</sup>

Despite the recent establishment of minimum wage protections in Qatar, however, salaries for migrants continue to be low. The migrant workers we interviewed reported monthly wages ranging from 600 to 3,500 Qatar Rials (\$165-960), with most workers earning between 910 and 1,800 Qatar Rials (\$250 - \$500). They described remitting the majority of their salaries, maintaining no personal savings, and in some cases inability to afford nutritious food. Moreover, as described in Part 4 of this report, across FIFA World Cup Qatar 2022 stadium construction sites partners, wages are set through de facto nationality-based wages scales, leading to large pay discrepancies between workers who fulfill the same role.

63 ILO, Labour reforms: Qatar’s new minimum wage enters into force, March 19, 2021, available online at: [https://www.ilo.org/beirut/projects/qatar-office/WCMS\\_775981/lang--en/index.htm](https://www.ilo.org/beirut/projects/qatar-office/WCMS_775981/lang--en/index.htm).

# Part 3: Challenges in Labour standards and Enforcement

## Inspection Processes by FIFA and the Supreme Committee for Delivery and Legacy

### FIFA and Supreme Committee for Delivery and Legacy inspections

In the lead up to FIFA World Cup Qatar 2022, the Supreme Committee has designed a multi-tiered system to enforce Worker Welfare Standards, including due diligence at the tendering stage, ongoing audits by the Supreme Committee’s Workers’ Welfare & Labour Standards Department, and independent audits by an external monitor. As we document in this report, however, despite these measures, rights violations perpetrated against migrant construction and security workers on FIFA World Cup Stadium remained rampant and unchecked. Instead, they were hidden by contractors who took systematic measures to hide abusive working practices.

### FIFA and Supreme Committee for Delivery and Legacy due diligence, audit, and inspection measures

In a letter to Equidem dated October 31, 2022, the Supreme Committee described due diligence, audit, and inspection measures in detail:

*Our due diligence begins at the tendering stage, and since 2016, 25% of contractors have failed pre-tender inspections, ensuring that substandard contractors are eliminated at the earliest possible stage of the process. All approved contractors, upon deployment, are also subjected to on-going due diligence through a robust four-tier audit system. This involves self-audits by contractors*

*and quarterly audits by the SC’s Workers’ Welfare & Labour Rights Department (WWD), followed by independent audits by an external monitor, appointed by the SC. Additionally, contractors are also subjected to unannounced inspections by the SC as well as inspections by the Ministry of Labour (MoL).*

*The SC has covered over 85,000 hours of audits and inspections across construction sites to monitor compliance with the WWS and where non-compliances are identified, we work closely with the contractor to ensure immediate rectification. If major or persistent non-compliances continue to be reported, we utilise enforcement measures that has resulted in 453 contractor violations being reported to MoL, with 50 contractors blocked by MoL from being deployed; demobilization of 73 contractors from SC projects; as well as the placement of 273 contractors on a watch list and blacklisting of 7 contractors.<sup>64</sup>*

As reported by the Supreme Committee, workers interviewed by Equidem confirmed regular site inspections on FIFA World Cup 2022 Stadiums. A Nepalese worker employed by Galfar Al Misnad as an assistant storekeeper on Al Bayt Stadium described regular site inspections:

*There are inspections from government side on our work site and accommodation too. They visit the work site every 2-3 months. Site health and welfare facilities like mess hall, sanitation,*

64 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

***toilets, safety equipment, issues facing workers are inspected by the labor inspector and those are improved.***<sup>65</sup>

An Indian worker employed by IMAR Trading & Contracting Co WLL, erecting safety barricades at Al Bayt and Lusail Stadiums also described frequent site inspection:

***The stadium work is for a mega event and the whole world is coming. The government is doing frequent inspection to maintain the quality of work. The officials usually communicate with our department chiefs and getting up-to-date reports.***<sup>66</sup>

An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL—as a fire and safety officer reported that site inspections were effective in raising safety standards on site:

***Officials from the government are visiting the site on regular basis, which is helpful for increasing the safety standards.***<sup>67</sup>

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described other areas where inspections were particularly helpful:

***There are inspections from the government side. They visit the work site every two months. Areas like site health and welfare—including rest shelters, cooling areas, water stations, and mess hall sanitation have been improved.***<sup>68</sup>

A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL (J&P)—on Education City Stadium,

described the inspections undertaken of worker accommodations

***They inspect cleanliness at the accommodation, food hygiene, pest control. If anything is not up to satisfaction, the company is warned and they improve it.***<sup>69</sup>

A Nepalese worker employed as a mason by Al Jaber Engineering WLL on Al Thumama Stadium confirmed a similar focus to inspections:

***There are regular inspections here. They usually see if workers are getting good food, standard accommodation, access to health facilities, and site cleanliness.***<sup>70</sup>

A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium described a similar focus of inspections:

***There are inspections from the government side at our work site and accommodations. They visit the work site every two to three months. Site health and welfare facilities like the mess hall, sanitation of toilets, and safety equipment are inspected by the labor inspector and those are improved.***<sup>71</sup>

A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium confirmed these inspection practices on Al Rayyan Stadium.<sup>72</sup>

65 A Nepalese worker employed by Galfar Al Misnad as an assistant storekeeper on Al Bayt Stadium, interviewed in Qatar, July 2022.

66 An Indian worker employed by IMAR Trading & Contracting Co WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, May 2022.

67 An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL, interviewed in Qatar, May 2022.

68 A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

69 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

70 A Nepalese worker employed as a mason by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

71 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

72 A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

## Invisible workers and rights violations

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium described persistent rights violations despite independent inspections:

*There are independent inspections by the SC [Supreme Committee] but they are not effective. They are showing the world that they are providing good facilities for our workers, but actually we get nothing.*<sup>73</sup>

Despite routine inspections, workers reported a range of company practices that rendered workers and the rights violations they faced invisible during inspections—a significant barrier to enforcing labour laws and FIFA standards. These practices include: (1) moving workers to alternate locations during inspections; (2) preparing sites to meet inspection standards; (3) employer workers on sites that are not audited; (4) limiting investigator engagement to senior company officials; (5) penalizing workers for making complaints; (6) diminished compliance in remedying issues raised by inspections over time; and (7) false representation of worker salaries in company books.

### Moving workers to alternate locations during inspections

Interviews conducted for this report show that inspections do not cover all workers employed at the stadium. An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, described being moved to alternate sites or sent back to the work camp on days when independent inspections were planned:

*The investigation team came every month, but we could not meet the FIFA or Supreme Committee Team because our workplace would be changed before they arrived. On the days where there is talk of inspection, we were sent elsewhere for*

*duty or sent to the camp. A company staff stood at the stadium gate and when the FIFA or Supreme Committee people came, he would inform our supervisors. Company officials gave us strict instructions that we should not go to the FIFA team with any complaints. We were told that strict action would be taken against anyone who complains.*<sup>74</sup>



Workers employed by HBK on Lusail Stadium, the marquis venue for the tournament, described company procedures for circumventing independent inspections. © Equidem 2022

An Indian construction worker employed by HBK on Lusail Stadium described company procedures for circumventing independent inspections:

*On the days where there is talk of inspection, on those days workers are sent elsewhere for duty or asked to remain home.*<sup>75</sup>

73 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

74 An Indian worker employed as a helper in the stone cutting section, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

75 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

An Indian worker employed as an electrician by HBK on Lusail Stadium, also reported being sent off site on inspection days:

*The duties of workers are changed before the FIFA monitoring team arrives. On the days when there are inspections, I am posted elsewhere or sent back to residence camp. Also, the FIFA Supreme Committee people only speak English and Arabic—and this is taken advantage of by the officers of the company.<sup>76</sup>*

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium also described being taken off site during inspections:

*At the site, both Qatari nationals and white folks used to visit. The white folks I think were from FIFA. Usually, the company sent us on leave when they visited. I met the white folks one or two times. I did not get a chance to talk to them, but I saw them from afar. People at higher posts from the company used to meet these people from Supreme Committee: Supervisors, Engineers, Managers, and Safety Officers used to walk with them.*

*We did not get any opportunities to talk to people from FIFA either. Whenever they used to come, the company would send us to the accommodation camp. They had vehicles on hand for this. Maybe they (managers from the company or other people from higher posts) knew before the FIFA team came to visit. They used to send us to the camp whenever the FIFA team was scheduled to visit*

*When they visited, there was extra cleanliness. Workers were asked to wear PPE. After they were gone, it was much more relaxed, but when they came to the site the company was strict.<sup>77</sup>*

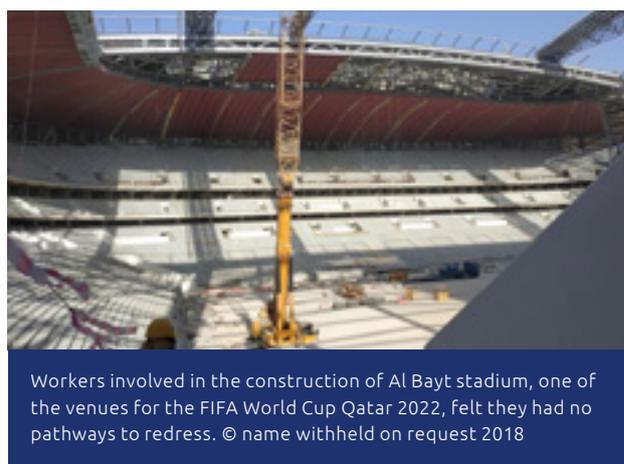
Notably, workers employed by HBK reported that they did not live on the Lusail Stadium site and were instead bused in for work. Workers reported commutes ranging from sixty to ninety minutes.<sup>78</sup>

The practice of locating workers off site further removed their working and living conditions from the ambit of inspection.

## Preparing sites to meet inspection standards

A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium described on-site preparations for the arrival of government inspectors:

*I don't know who they were exactly, but I noticed some Gentlemen came to our site for inspections once a month and sometimes twice a month. When the company received information that they were coming to our site, there was a different environment that day. On those days, the main concern was that they do not make any mistake, so they tried to do everything perfectly.<sup>79</sup>*



Workers involved in the construction of Al Bayt stadium, one of the venues for the FIFA World Cup Qatar 2022, felt they had no pathways to redress. © name withheld on request 2018

## Employing workers on sites that are not audited

A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—described the experience of working on a site that is not audited frequently, and where he feels he has no pathways to redress:

76 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

77 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, August 2022.

78 A Bangladeshi labourer employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022; A Nepalese worker employed by employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

79 A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, April 2022.

*We do not work in the main branch; we work in a sub-branch. These branches are not audited much so they require us to do a lot more work. I face a lot of violations here. I am supposed to get 42,000 taka (\$416) salary, but I get only 30,000 takas (\$297). I do not get paid for overtime work and I work from six am to six pm seven days a week. I do not get sick leave or annual leave. I did not get my promotion. We have nowhere to report these violations. When the inspectors come to see the working environment, if they ask us something, we only say what our employers have taught us to say.<sup>80</sup>*

### Limiting investigator engagement to supervisors and senior company officials during site visits

An Indian scaffolder employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums reported that during site visits, officials communicate with department chiefs rather than workers:

*The stadium work is for a mega event and the whole world is coming. The government is doing frequent inspections to maintain the quality of work. The officials communicate with department chiefs to get up to date reports.<sup>81</sup>*

An Indian gardener employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums confirmed that government inspectors engage department with supervisors, department chiefs, and company officials rather than workers.<sup>82</sup>

### Penalizing workers for making complaints

In a letter to Equidem dated October 31, 2022, the Supreme Committee for Delivery and Legacy (SC) described the mechanisms they had put in place to support workers to share concerns and feedback on welfare matters—including Worker Welfare Forums and an anonymous grievance hotline.

*In addition to our due diligence, we have also focused on empowering workers to share concerns or feedback on any welfare matters. The SC established a three-tier grievance mechanism early on to support workers’ voices and provide them a safe platform to share grievances. These include the Workers’ Welfare Forums (WWF) that allow workers to share their concerns with elected representatives (note: representatives are required to be elected where a contractor has more than 100 workers), without any fear of retaliation. We also introduced a dedicated anonymous workers’ grievance hotline for workers to report issues directly to the Workers’ Welfare team. To date, 1,207 cases have been lodged of which 96% have been resolved.<sup>83</sup>*

The Supreme Committee reports receiving 1,207 cases through this system from the 30,000 workers they estimate have been employed across FIFA World Cup Qatar 2022 sites—confirming, at best, that 4% of workers on FIFA World Cup Qatar 2022 made use of these mechanisms. According to our research, widespread fear of retaliation prevents workers from reporting rights violations.

80 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

81 An Indian scaffolder employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums, interviewed in Qatar, May 2022.

82 An Indian gardener employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums, interviewed in Qatar, June 2022.

83 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

An Indian worker employed as an electrician by HBK on Lusail Stadium, reported fear among migrant workers that kept them from reporting to officials when they made site visits:

*No one speaks in front of the officials because many people have been fired from their jobs or sent on forced leave and not called back. We do not protest because we are afraid of losing our jobs. Apart from threatening and abusing the rest of the workers when a complaint is filed, they show that workers who complain will have a police case filed against them and may even be sent to jail.*<sup>84</sup>

### Diminished compliance with remedying issues raised by inspections over time

A Nepalese worker employed by HBK on Lusail Stadium reported that the company paid less attention to inspections over time:

*There are inspections from the government side at the worksite and some accommodations too. In the beginning, it was effective and the company complied with the comments given by the inspectors. Later on the company didn't comply with the inspector's comments. In the beginning they visited several times, but later on they only visited once every three to four months.*<sup>85</sup>

### False representation of worker salaries in company books



A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—reported a company practice of paying wages below the contractually promised rate, and misrepresenting salaries in company books:

*I only received overtime my first year. After that they refused to give overtime and began deducting from our wages for different reasons. We ended up getting less than what was written in our contracts. When independent inspections took place, they showed them salary books that showed that they were paying us properly for overtime and other extras.*<sup>86</sup>



A Bangladeshi worker employed to work as a head designer on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt Stadium reported company measures to sidestep FIFA salary guidelines:

*Even though FIFA imposed strict guidelines, the company manipulates workers' salaries. At the time we are supposed to receive our salaries, the company deducts breakfast money even though it is the responsibility of the company to provide breakfast.*<sup>87</sup>

84 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

85 A Nepalese worker employed by employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

86 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

87 A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

## Inadequate Employer Systems for Workers to File Complaints

### Barriers to accessing remedies in Qatar

In March 2018, Qatar established ‘Committees for the Settlement of Labour Disputes’ (‘Committees’) aimed at reducing the barriers to accessing justice. As per the law, Committees are required to issue judgements on cases in just six weeks of a complaint being made and would be able to ensure that workers received remedy, for example by ordering employers to pay dues.

However an Amnesty International report on gaps related to accessing justice outlined a number of issues including language, travel costs and a lack of pro bono legal services all hinder migrants’ abilities to successfully make claims in Qatar. Additionally, the lack of legal aid and limited assistance from most embassies make it next to impossible for most workers to pursue their claims once they have left the country. Companies often do not participate in legal processes, and there appears to be few effective measures taken to sanction them for not doing so. Combined with a failure to consider collective cases, the system is beset with bottlenecks and blockages.<sup>88</sup>

### Absence of safe procedures to report rights violations at work



A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadiums described being threatened with termination for complaining about food quality:

*The company provides us with food and subtracts it from our salary. We pay 300 rials (\$82) a month for food, but the company provides us with*

*cheaper and less caloric food every day. When we complained about this problem, they threatened to terminate us. They did not sort out the problem. Instead, they gave us warning letters.<sup>89</sup>*

An Indian construction worker employed by HBK on Lusail Stadium described inadequate procedures for reporting rights violations:

*There is no system to complain. Whoever complains, their job is over, so no workers complain. But suppose a worker gathers courage and complains? Who will investigate the complaint? Only the people from the company and the government will investigate, and they do not conduct fair investigations. They cover up instead by accusing the complainant. This has happened to many people, so no one complains because we are afraid.<sup>90</sup>*

A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium described having to rely on his foreman to address problems at work—an inconsistent and unreliable process for address rights abuses:

*Once I got a low OT [overtime] payment so I complained about it to my foreman. He became angry and loud and tried to ignore my problem. Later, he became soft and said we can talk about it later, now I am stressed. This has happened to me several times. Sometimes the foreman solves my problems and sometimes not.<sup>91</sup>*

An Indian worker employed as an electrician by HBK on Lusail Stadium, also reported that there was no reliable procedure to lodge complaints, and workers who did complain faced threats that they would be fired:

88 Qatar: All work, no pay: The struggle of Qatar’s migrant workers for justice, Amnesty International, 19 September 2019, available online at: <https://www.amnesty.org/en/documents/mde22/0793/2019/en/>.

89 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, April 2022.

90 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

91 A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, April 2022.

*Apart from my job as an electrician’s helper, I was made to work in other departments. I objected to this in front of the supervisor and then the supervisor complained to the senior officers of the company that I was refusing to work. The next day the senior officer called me in and asked me what happened. I held to my point but he did not listen to me. Instead, he scolded me that I have to do whatever the supervisor says. If I don’t do that work, I can leave. I was also told not to complain in future or I would be fired from my job. After that I didn’t complain.*<sup>92</sup>

A Nepalese worker employed by HBK on Lusail Stadium described his inability to seek relief through company channels:

*I complained and requested site management to increase my salary. I was sent to the head office but no action was taken. Then the site administrator told me it was not approved by the head office.*<sup>93</sup>

Another Nepalese worker employed as a scaffolder by HBK on Lusail Stadium also described inability to seek relief:

*Who do we complain to? We do not understand their language, they do not understand mine. If we complain to the supervisor, they will say ‘batayega, batayega’ [I will inform]*<sup>94</sup>

A Bangladeshi worker employed as a roofer by Six Construct Qatar on Al Janoub Stadium reported challenges in enforcing contract provisions:

*We have workplace issues. According to our contract, every two years we should be given 45 days of paid vacation. Those who do not go on vacation must be paid an additional 45 days of salary and the cost of the air ticket. This is in our contract, but it doesn’t happen. We have raised this with HR but that didn’t work. If anyone complains, the company doesn’t address it but tries to hide the issue instead.*<sup>95</sup>

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium described challenges in reporting rights violations through company channels:

*We have chain of command procedures to report any rights violations to our Admin and HR departments. But they are company staff so they only look after the company, not the workers. We have made many complaints but they don’t care about our problems.*<sup>96</sup>

A Kenyan worker employed by HBK on Lusail Stadium reported that abuses and harassment by supervisors were never investigated.

*Physical harassment and abuse that was physical in nature was never resolved, you could report, and nothing was done to the perpetrators who were our supervisors.*<sup>97</sup>



92 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

93 A Nepalese worker employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

94 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, August 2022.

95 A Bangladeshi worker employed as a roofer by Six Construct Qatar on Al Janoub Stadium, interviewed in Qatar, May 2022.

96 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

97 A Kenyan Worker employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, October 2022.

## Retaliation for reporting rights violations

In a letter to Equidem dated October 31, 2022, the Supreme Committee for Delivery and Legacy (SC) described the mechanisms they had put in place to support workers to share concerns and feedback on welfare matters—including Worker Welfare Forums and an anonymous grievance hotline.

***In addition to our due diligence, we have also focused on empowering workers to share concerns or feedback on any welfare matters. The SC established a three-tier grievance mechanism early on to support workers’ voices and provide them a safe platform to share grievances. These include the Workers’ Welfare Forums (WWF) that allow workers to share their concerns with elected representatives (note: representatives are required to be elected where a contractor has more than 100 workers), without any fear of retaliation. We also introduced a dedicated anonymous workers’ grievance hotline for workers to report issues directly to the Workers’ Welfare team. To date, 1,207 cases have been lodged of which 96% have been resolved.***<sup>98</sup>

The SC reports receiving 1,207 cases through this system from the 30,000 workers they estimate have been employed across FIFA World Cup Qatar 2022 sites—confirming, at best, that 4% of workers on FIFA World Cup Qatar 2022 made use of these mechanisms. According to our research, widespread fear of retaliation prevents workers from reporting rights violations. An Indian worker employed by IMAR Trading & Contracting Co WLL on Lusail Stadium as a safety officer described the consequences workers face for reporting rights violations:

***There are consequences for reporting rights abuses, but I am afraid to even explain them to you. There is a chance of the employee getting banned if the employer makes a complaint against them. Sometimes the employees are compelled to pay compensation to the company for leaving the job. The compensation can be a huge amount, like 50,000 rial (\$13,731), so no one is trying to fight with the employer.***<sup>99</sup>

These consequences are well known among workers. An Indian worker employed by IMAR Trading & Contracting Co WLL, erecting safety barricades at Lusail Stadium also described retaliation for reporting rights abuses:

***The employer might move a case against the employee and they might be under risk of life time ban or penalties.***<sup>100</sup>

An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadiums confirmed that workers face legal cases, lifetime bans, and penalties for reporting rights violations.<sup>101</sup> An Indian gardener employed by IMAR Trading & Contracting Co WLL on Lusail Stadium also confirmed these patterns of retaliation.<sup>102</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium described retaliation for reporting rights violations:

***We often face rights violations, but there are no procedures to report them. If someone does report, they will be terminated by the company.***<sup>103</sup>

98 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

99 An Indian worker employed by IMAR Trading & Contracting Co WLL on Lusail Stadium as a safety officer, interviewed in Qatar, May 2022.

100 An Indian worker employed by IMAR Trading & Contracting Co WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, May 2022.

101 An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadium, interviewed in Qatar, June 2022.

102 An Indian gardener employed by IMAR Trading & Contracting Co WLL on Lusail Stadium, interviewed in Qatar, June 2022.

103 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium described the retaliation for raising workplace rights violations:

***If we go to the employer with any complaint, they never help us. Eventually, they will fire us and send us back home.***<sup>104</sup>

A Kenyan worker employed by HBK on Lusail Stadium also described being warned that any complaints would meet with termination:

***“If you raise any alarm, we will sack you.” This threat was common on our worksite.***<sup>105</sup>

According to an Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, workers have no procedures to report rights violations, and when they do raise issues, they face retaliation:

***There is no system to complain here. The complaints get leaked and the workers suffer a lot. I have received many threats that I will be fired from my job because I oppose indecent treatment. The supervisor does not record my extra working hours for this reason. That’s why no workers complain because of fear. Such as abuse, assault, threats to be fired.***<sup>106</sup>

A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums described being fired for speaking out against rights violations:

***I faced a lot of violations. I did not get overtime pay for compulsory overtime, I did not get sick or annual leave. I did not get a promotion. We have nowhere to report these violations. When I spoke out against this injustice, they fired me.***<sup>107</sup>



An Indian construction worker employed by HBK on Lusail Stadium also described the types of retaliation workers face for speaking out against discrimination and rights violations:

***There is discrimination but no one speaks against it. Whoever does speak loses his job, so most workers silently accept discrimination. Here, Arabic speaking people are assigned less work and migrants are given more work. If we protest, they threaten to cut our salaries or they fire us. Supervisors shout, abuse, and sometimes even beat workers. This is why no one protests. If I complain will be abused, threatened with dismissal, and the duty will be made stricter for me.***<sup>108</sup>

An Indian worker employed as an electrician by HBK on Lusail Stadium, also described fear of speaking out against rights violations:

***In case we make a complaint, only the people from the company conduct the investigation. They do not conduct a fair investigation. They will save their supervisors by accusing the workers and removing them from the job. This has happened to many people***<sup>109</sup>

104 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

105 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

106 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

107 A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums, interviewed in Qatar, May 2022.

108 An Indian construction worker employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022.

109 An Indian worker employed as an electrician by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022.

An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL—as a fire and safety officer explained that this culture of fear is common across Qatar:

***If someone has a grievance against an employer, they do not raise a complaint because they are afraid. Companies will try to ban workers who move against them. Workers also get penalties. No one will ever stand up against a company while working in Qatar.***<sup>110</sup>

**Good practices—avenues for reporting rights violations**

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described company channels for reporting rights violations:

***We can report issues to site administration and the HSE [Health, Safety, and Environment] Department. Alternatively, we can talk to the Project Management team. This system works and it works across different channels which is also effective.***<sup>111</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium described clear procedures for reporting rights violations:

***If we face any issues, we have to go to the ‘Safety Department’ and file a complaint. They will then inquire into the situation.***<sup>112</sup>

A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium also described channels for reporting rights violations:

***We can report issues to Site Admin. Alternatively, we can talk to a Project Manager. This system works. We have more than one channel so it is effective.***<sup>113</sup>

A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium also confirmed access to these channels for reporting workplace rights violations.<sup>114</sup>

110 An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL, interviewed in Qatar, May 2022.

111 A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

112 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

113 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

114 A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

## Failure to Protect Freedom of Association and Collective Bargaining

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 for 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 urges 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 to join or form a trade union irrespective of nationality, identity or background.

The status of freedom of association and collective bargaining as fundamental principles and rights at work has been well established among ILO member states.<sup>115</sup> 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 organizations. Freedom of association is also guaranteed in almost all national constitutions.<sup>116</sup>

Freedom of association is a cornerstone right because it creates the conditions for trade unions 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.

Global union federations like the Building and Wood Workers’ International have been involved in stadium construction site inspections and technical support. The Supreme Committee for Delivery and Legacy also established Worker Welfare Forums consisting of elected representatives of major construction partners’ workforces to create a safe environment for workers to raise matters of concern without fear of reprisal.<sup>117</sup> Worker Welfare Forums were an important measure to establish an element of worker representation. But the cases of exploitation documented in this report demonstrate that the Forums cannot address the power imbalance on stadium construction sites that have enabled exploitative employers to operate with impunity. And yet, though the Worker Welfare Forums could have been transitioned into trade union representation, even the Forums were disbanded once tournament stadium construction projects came to an end.



### 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 Organization (ILO) defines workplace cooperation as a process

115 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%20Organization%20unanimously,the%20ILO's%20Constitution%20of%201919](https://www.ilo.org/global/about-the-ilo/mission-and-objectives/WCMS_099766/lang--en/index.htm#:~:text=The%20International%20Labour%20Organization%20unanimously,the%20ILO's%20Constitution%20of%201919).

116 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](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_343023.pdf).

117 “Workers Welfare Forums”, Workers’ Voice, Supreme Committee for Delivery and Legacy, May 2022, available online at: <https://www.workerswelfare.qa/en/our-legacy/workers-voice>.

whereby workers’ representatives participate with management in resolving issues of common concern.<sup>118</sup> 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: 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.

In April 2019, by ministerial decree No. 21 of 2019, Qatar set up a mechanism of joint committees comprising an equal number of worker and employer representatives for companies with thirty or more workers to discuss and resolve company-related issues.<sup>119</sup> According to Qatari

law, Joint Committees are mandated with the study and discussion of all work-related matters including organizing work, improving productivity, implementing worker training programmes, preventing risks and improving compliance with occupational safety and health rules, and increasing workers’ general culture.<sup>120</sup> Workers elect their representatives to Joint Committees for a term of two years, and meet once a month.<sup>121</sup> It remains to be seen how Joint Committees will work in practice and how effective they will be in addressing worker grievances.<sup>122</sup>

### Case Study – Freedom of association violations and human rights abuses faced by migrant workers of the Al Bandy International Group in Qatar<sup>123</sup>

The right to strike has been established in international law for decades, in global and regional instruments, such as in the ILO Convention No. 87 (articles 3, 8 and 10), the International Covenant on Economic, Social and Cultural Rights (article 8), the International Covenant on Civil and Political Rights (article 22), the European Convention on Human Rights (article 11), and the American Convention on Human Rights (article 16). However, under Qatari law migrant workers are banned from participating in strikes and joining unions.<sup>124</sup>

118 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](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R094).

119 The Minister of Administrative Development, Labour and Social Affairs’ Decision No. 21 of 2019 which regulates the conditions and procedures for the election of workers’ representatives to joint committees, ADLSA, available online at: <https://www.ilo.org/dyn/natlex/docs/MONOGRAPH/108501/134135/F1786604991/QAT108501%20Eng.pdf>.

120 Freedom of association, collective bargaining and industrial relations, NATLEX, International Labour Organization, available online at: [https://www.ilo.org/dyn/natlex/natlex4.detail?p\\_lang=en&p\\_isn=108501&p\\_country=QAT&p\\_count=133&p\\_classification=02&p\\_classcount=5](https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=108501&p_country=QAT&p_count=133&p_classification=02&p_classcount=5).

121 Decree paves way for election of worker representatives in enterprises, ILO, 1 May 2019, available online at: [https://www.ilo.org/beirut/projects/qatar-office/WCMS\\_696935/lang--en/index.htm](https://www.ilo.org/beirut/projects/qatar-office/WCMS_696935/lang--en/index.htm).

122 Social protection, not just legal protection: Migrant laborers in the Gulf, Noha Aboueldahab, Brookings, 23 August 2021, available online at: <https://www.brookings.edu/research/social-protection-not-just-legal-protection-migrant-laborers-in-the-gulf/#footnote-20>.

123 This case study is based primarily on interviews with 9 male migrant workers from South Asia, East Africa and the Middle East working for Al Bandy Engineering and Electrowatt Co. in Qatar. The individuals are nationals of India (5 in total), Bangladesh (2 in total) Nepal (1 in total), and Jordan (1 in total). Interviews were conducted in Qatar and in the respective countries of destination Nepalese, Malayalam, English, Bengali, and Hindi. Research was carried out between August and September 2022.

124 Qatar: Migrant Workers Strike Over Work Conditions, Human Rights Watch, 8 August 2019, available online at: <https://www.hrw.org/news/2019/08/08/qatar-migrant-workers-strike-over-work-conditions>.

### June 2022 – Hundreds of workers file a complaint with the Ministry of Labour against the Al-Bandary Group

In June 2022, several hundred Al-Bandary employees—a consortium that includes construction, real estate, hotels, food service and other ventures<sup>125</sup>—filed a complaint with the Ministry of Labour following which labour officers assured them of prompt payment.<sup>126</sup> The workers reported the non-payment of up to seven months of wages, overtime and end-of-service benefits.<sup>127</sup>

### June 2022 – 1,000 migrant workers organize a strike in front of the Labour Court

At the end of June, migrant workers from various Al-Bandary enterprises organized a strike on the main highway in front of the Labour Court on Salwa Road, Doha. Santa Bahadur says there may have been over 1,000 workers on the road. Government authorities did not detain or arrest any of the workers but they were instructed to return to their rooms and promised that their dues will be cleared soon. “I think they didn’t arrest us because there were so many of us protesting,” Santa Bahadur said.

“Such rallies have been held in the past too. But they weren’t in city centres. So, arrests didn’t happen. This time, it occurred in the heart of the city blocking traffic, which might have irked the government,” Junaid said. Two days after the protest on Salwa road, workers received two months’ worth of pending wages in early July and the company assured them that their wages would soon be settled.

### August 2022- Workers arrested and detained for striking outside Al-Bandary Group Headquarters

When the company continued to default on wage payments, on August 14, a group of about five hundred workers from the company protested outside the Doha offices of the Al Bandary International Group at Al Shoumoukh Tower.<sup>128</sup> Hours later, about 300 workers were arrested and taken to the Search and Follow-up Department at Saheliya. “About half the workers were Nepalese,” Santa Bahadur said. “The remaining workers were from India, Bangladesh, Egypt, Jordan and the Philippines.”

Osama, a worker involved in the August 14 strike, described his experience: “While we waited inside the tower, the police came and escorted us to the police station. Then they put us in jail without an investigation, without any case or charge for nine days. They took a picture of us like we are criminals,” Osama said.

## Violation of worker rights in detention

Everyone arrested or detained in connection with a criminal charge must be brought promptly before a judge or other judicial officer, so that their rights can be protected. The judge must rule on the lawfulness of the arrest or detention, and on whether the detainee should be released or detained pending trial.<sup>129</sup> States are also obliged to ensure that detainees have access to necessities and services that satisfy their basic needs, including adequate and appropriate food, washing and sanitary facilities, bedding, clothing, health care,

125 Qatar detains workers protesting late pay before World Cup, Associated Press, Malak Harb, 22 August 2022, available online at: <https://apnews.com/article/soccer-sports-arrests-dubai-2981f6ac57f281855a6b04ae651062f5>

126 Interview with Osama Jayousi and Santa Bahadur, August 2022.

127 Qatar deports workers who protested against unpaid salaries, Middle East Eye, 23 August 2022, available online at: <https://www.middleeasteye.net/news/qatar-deports-workers-protest-unpaid-salaries-world-cup-fifa>.

128 Qatar detains workers protesting late pay before World Cup, Associated Press, Malak Harb, 22 August 2022, available online at: <https://apnews.com/article/soccer-sports-arrests-dubai-2981f6ac57f281855a6b04ae651062f5>.

129 ICCPR, Art. 9 (3).

natural light, recreation, physical exercise, facilities to allow religious practice, and communication with others, including those in the outside world.<sup>130</sup>

At the Search and Follow-up Department, workers were made to wait in the bus for two hours before they were provided a room. The workers were transferred to several large rooms with bunk beds that housed about 30 workers each. “The beds were not clean,” Santa Bahadur said, “Some workers did not have a blanket, pillow, or both.” At about 10pm, the air conditioner in the rooms were switched off. “The police official who turned the air conditioner off said, ‘Can’t you stay without AC here? You were the ones protesting by standing up in the daytime sun.’ The AC was turned off for six hours and then turned back on the next morning.” The police confiscated their mobile phones. “There was a landline phone in the deportation centre from where the worker could make a phone call,” Santa Bahadur said. “They had to be on a queue to make a phone call.”

## Deportation without fair trial

Over the course of the next two weeks, while the workers lived in jail, their visas were cancelled, and at least 60 (but possibly up to 300 migrants) were deported to their countries of origin.<sup>131</sup> Prior to their deportation, many of the workers were paid their dues while others were deported without their pending wages.<sup>132</sup>

For instance, on 16 August, Nepalese workers described being taken to the office of the Search and Follow-up Department. “The officers introduced themselves as Labour Department representatives,” Santa Bahadur said, “They asked why we were protesting and asked them about the issues they faced. That morning, the officials interviewed each Nepalese worker, and wrote down the details of unpaid wages owed to them.”

The following day, workers were taken to the deportation centre and their pictures and fingerprints were collected. “The workers were taken to their rooms and instructed to pack their belongings.” Some of the workers were handcuffed in pairs, two workers chained to one cuff, and they had to pack their belongings with their one free hand that had not been chained. On 18 August, in the morning, 60 Nepalese workers were paid their wages and end-of-service benefits in cash. At 1pm, they were provided their air tickets to Nepal and were taken to the airport. At immigration, their passports were imprinted with a “cancel” stamp, and they were taken to the aircraft. They landed in Kathmandu at 1030am, the next morning.

These practices violate fair trial standards. When anyone is arrested or detained, they must be notified of the reasons for their arrest or detention and of their rights, including their right to counsel.<sup>133</sup> They must be informed promptly of any charges against them.<sup>134</sup> This information is essential to allow the person to challenge the lawfulness of their arrest or detention and, if they are charged, to start preparing their defence.

130 Special Rapporteur on torture, UN Doc. A/64/215 (2009).

131 Interview with Osama Jayousi and Santa Bahadur, August 2022.

132 Ibid.

133 ICCPR, Art 9 (2).

134 Ibid.

# Part 4: Rights Violations Facing Migrant Construction Workers and Areas for FIFA Intervention

## Worker deaths on site

Workers employed by HBK on Lusail Stadium described two worker deaths:

*In March 2019, one Bangladeshi national died while working at the Lusail stadium. It was only a few days after I started working there. He fell from level 5 to the ground floor. He was a scaffolder. I did not see it happen. But when we heard the news, we rushed to the site. The safety officer was already talking to the hold watcher. He was the only person on site with the deceased at the time. There were police on the site. We were strictly told not to take photographs. We could not go near the site. We did not see the body. But we heard the safety officer and the hold watcher talking. It came to be known that he was not wearing his safety belt at the time.*

*Hearing about such an incident, to know that a person died right before you, it made me nervous. I always checked my belt, its expiry date. I was cautious at my work.*

*I do not remember the date, but it must be 2021. Another Chinese national died on the site at Lusail stadium. He fell from a height, around 25 meters. We heard people saying that none of his body parts [hands/feet] were moving/working at the time. He was taken to a hospital, and he died later. We heard that his belt unfastened which led to the fall.<sup>135</sup>*

## Nationality-Based 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 construction sector in Qatar is widespread, systematic, and openly carried out.

The workers we spoke to described nationality-based hierarchies and discrimination at work.

An Indian construction supervisor employed by IMAR Trading & Contracting Co WLL working on Al Bayt, Lusail and Al Thumama Stadiums described discrimination between Qatari nationals and migrant workers:

*I don't feel discrimination between migrant workers, but we are considered a second category below nationals.<sup>136</sup>*

<sup>135</sup> A Nepalese worker employed by Hamad Bin Khalid Engineering Company WLL (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

<sup>136</sup> An Indian construction supervisor employed by IMAR Trading & Contracting Co WLL working on Al Bayt, Lusail and Al Thumama Stadiums, interviewed in Qatar, May 2022.

An Indian scaffolder employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums also described a tiered system of employment:

***We are considered to be in a second lower category when compared to workers from Qatar.***<sup>137</sup>

An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadiums also described a two-tier system between Qatar nationals and migrant workers:

***As migrants we are considered a lower category compared to Qatar nationals***<sup>138</sup>.

A Bangladeshi worker employed as an office administrator and working for the Salini Impregilo Group on Al Bayt Stadium, described various forms of nationality-based discrimination—including differential wages, accommodations, and access to medical treatment:

***I do not get the same salary for the same work. Arab speaking and western people get the highest. The rest of us get almost the same salaries. We are also given different accommodation and have access to different medical treatment.***<sup>139</sup>

As explained by a Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, discrimination between migrant groups takes the form of nationality-based preferential treatment among supervisors:

***Supervisors favor their nationalities and give them advantages for good posts, good food, and good salaries. When people from their own nationality apply for vacation, it is approved easily but we will require six months for the same process.***<sup>140</sup>

## Discrimination in work assignments

An Indian construction worker employed by HBK Contracting Company on Lusail Stadium described discrimination in work assignments:

***Supervisors discriminate in hiring and assigning work. The work which is done at high altitude—in which labour is hard and risk is high—that work will not be given to a Qatari worker or an Arabic speaking worker. Even if it is given to them, they can refuse. If the same work is given to us, we cannot refuse. If we refuse, our pay might be cut, but that doesn't happen with Qatari and Arabic speaking workers.***<sup>141</sup>

## Nationality-based wage discrimination

A Bangladeshi worker employed by Salini Impregilo Group on Al Bayt Stadium explained:

***On the ground level of the construction site, most of the workers are migrants. Qatar natives and western people get extremely high salaries compared to migrant workers.***<sup>142</sup>

Another Bangladeshi employed as a cleaner for the Salini Impregilo Group on Al Bayt Stadium described provided further details on nationality-based wage hierarchies:

***Arab language speaking and western people get the highest wages. The rest of us get less. I was recruited for 800 rials (\$219), but Indian workers were paid 1,000 rials (\$274.65) for the same position. This is clear discrimination.***<sup>143</sup>

137 An Indian scaffolder employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums, interviewed in Qatar, May 2022.

138 An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadium, interviewed in Qatar, June 2022.

139 A Bangladeshi worker employed as an office administrator, working for the Salini Impregilo Group on Al Bayt Stadium, November 2021.

140 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

141 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

142 A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, November 2021.

143 A Bangladeshi worker employed as a cleaner for the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, March 2022.

A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums also reported facing nationality-based wage discrimination:

***There are many kinds of inequality. The salary is higher, especially for Indians, with more opportunities offered. For the same work, Bangladeshis are paid less. Native and European workers get priority in all sorts of ways—salary, increments, flexibility of work, and leave***<sup>144</sup>

A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium described nationality-based wage discrimination:

***There is discrimination on the basis of nationality in salaries. Indian and Filipino nationals get paid more than Nepalese, Sri Lankan, and Bangladeshi nationals.***<sup>145</sup>



A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium provided information on wage discrimination within his team of twenty workers:

***There is discrimination in wages. Nepalese and Bangladeshi workers get 1,500 rials (\$411.95) per month and Indian and Filipinos get 1,800 rials (\$494.34) per month.***<sup>146</sup>

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium described nationality-based wage discrimination in his department:

***Our project engineer is Indian and we have some Indian scaffolders. When Nepalese request a salary increment, he refuses and tells us that he will do it next month. When Indian's request, he does not say anything. He signs their paper and they get their salary increment.***<sup>147</sup>

A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL (J&P)—on Education City Stadium, described nationality-based wage discrimination:

***I've seen discrimination at my workplace. There is discrimination in the salaries paid to workers. In my company, Nepalese drivers are paid 1,400 rial (\$384) and Bangladeshis are paid 1,600 (\$439.41). At J&P, Nepalese crane operators are paid 2,500 (\$686.58). whereas Filipino operators are paid 3,500 (\$961.21).***<sup>148</sup>

A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium also described nationality-based wage discrimination:

***Workers face wage discrimination on the basis of nationality. Indians are paid 1400-1600 rials (\$384.48-439.41) and Nepalese are paid 1,200 rials (\$329.56) for the same job.***<sup>149</sup>

A Nepalese steel fixer employed by an unnamed contractor on Al Rayyan Stadium also described facing a similar form of discrimination:

***We are not paid equally. There is different pay for workers of different nationalities. Me and my friend Gopal, we both are from Nepal. We get paid 900 rial (\$247.17) a month as basic salary and another worker here, Muthu, who is from India is paid QAR 1,200 (\$329.56) as our monthly basic salary.***<sup>150</sup>

144 A Bangladeshi worker employed as a digital print designer by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

145 A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium, interviewed in Qatar, April 2022.

146 A Nepalese worker employed as a plumber by Salini Impregilo Company on Al Bayt Stadium, interviewed in Qatar, April 2022.

147 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, July 2022.

148 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

149 A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

150 A Nepalese worker employed as a steel fixer on Al Rayyan Stadium, interviewed in Qatar, September 2020.

## Discriminatory treatment

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium described workplace discrimination:

*I have had so many experiences of discrimination in the eight years I have had this job. When our regular job finishes, everyone else goes for regular breaks but sometimes my supervisor or foreman give me extra work to do. Also, with regard to vacation time, we Bangladeshis apply so many times but are never approved. On the other hand, all other nationalities apply for their vacation and their applications are approved in a short time. They get support from their senior nationalities. This is racial discrimination.*<sup>151</sup>

An Indian construction worker employed by HBK on Lusail Stadium described discriminatory treatment:

*If local people take rest at work, supervisors don't scold them—even if they repeatedly stop to drink water or go to the toilet. This is not the same for migrants.*<sup>152</sup>

A Nepalese worker employed by HBK on Lusail Stadium reported discrimination in access to rest areas:

*In the summer season it is very hot. The company has provided rest shelters in some of locations, but it is not enough space for us all to take rest. We have requested several times to prepare more rest areas so that we can also take rest during lunch time, but the company management won't listen us. Qatar nationals, Egyptian and Pakistani workers are provided air-conditioned rest areas by the company.*<sup>153</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium described religious discrimination:

*As a Muslim, I carry my beard. Then my senior threatened me: “if you do not shave tomorrow, I will terminate you.”*<sup>154</sup>

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium described nationality-based discrimination:

*There is huge discrimination on the basis of nationality. All the time, supervisors support workers from their own country. There are a lot of Indian workers in our company. All the Indian supervisors and engineers give preference to their own nationalities.*<sup>155</sup>

## Barriers to promotion and advancement



Workers described barriers to advancement, even after long periods of employment. A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums explained:

*Even after working for nine long years with this company, my salary has not increased.*<sup>156</sup>

A Bangladeshi construction technician employed by Advance Construction Technology Services on Al Bayt, Lusail, and Khalifa Stadiums also described nationality-based discrimination:

151 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

152 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

153 A Nepalese worker employed by employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

154 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

155 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

156 A Bangladeshi worker employed as a digital print designer by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

***Even after working for more than four and a half long years with this company, my salary did not increase.***<sup>157</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadium described nationality-based barriers to advancement:

***I had five years of experience in security at Abu Dhabi and was initially selected as a supervisor, but when I received my visa, I came to know I had actually been hired as a security guard. Based on my experience, I am eligible for a senior post. I applied several times and also made requests to my supervisor and management. The problem is that I am Bangladeshi and the supervisors are from Pakistan and other countries. There is discrimination based on nationality. For the last three years I have seen that my supervisors and senior management support their own nationalities. Not only in promotion, but also in other facilities. Since there is no opportunity for me to get a promotion, I resigned and decided to go home.***<sup>158</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium described nationality-based discrimination in assigning promotions:

***There is discrimination all the time. I have been working for five years in this company. I have seen my company management promote other security guards to supervisor and senior supervisor positions during this period. But still, we Bangladeshis remain in the same security guard position. When anyone gets a promotion, their salary will also increase. We have no Bangladeshis in good positions where we can request good***

***sites for work. Our senior management staff are Pakistani, Indian and African. They always support their native nationalities.***<sup>159</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium also described experiencing nationality-based discrimination in promotion:

***There is discrimination on the basis of nationality. For the last two and a half years I have observed my site supervisor, senior supervisor, and company manager support workers of their own nationality in promotion and other areas.***<sup>160</sup>

Structured opportunities for advancement link promotion to experience and skill upgradation rather than nationality-based preference. For instance, a Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, described receiving training from his company and a corresponding salary increase:

***I came to Qatar on a labour visa. Later, the company provide me training to work as a scaffolder. I am working as a scaffolder now. After I was promoted, the company verbally promised to increase my salary and I have received the same.***<sup>161</sup>

Clearly defined, skills-based pathways for advancement facilitate diversity among higher skilled employees, and ultimately increase job satisfaction and worker productivity. The absence of these pathways in the construction sector in Qatar demonstrates the need for further efforts by FIFA, its construction partners, and the Qatar authorities to extend good practices for expanding equal opportunities across Qatar.

157 A Bangladeshi construction technician employed by Advance Construction Technology Services on Lusail, Khalifa, and Al Bayt Stadiums, interviewed in Qatar, January 2022.

158 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium, interviewed in Qatar, April 2022.

159 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

160 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

161 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

## Wage Theft

Denial of wages and employment benefits, whether written or unwritten in employment agreements, 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.<sup>162</sup> Across the construction, maintenance, and security sectors in Qatar, our research found rampant wage theft practices—including non-payment and underpayment of wages and severance.

Qatar’s labour law states that the wages of the workers employed on annual or monthly wages shall be paid at least once every month. The wages of all other workers shall be paid once at least every two weeks. Further, workers are entitled to overtime wages, and end-of-service benefits for all employee who have completed one year or more in continuous service.<sup>163</sup>

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. Qatar has not ratified Convention 95 or 158. In the wake of the COVID-19 pandemic, Qatar issued policies relaxing enforcement of employment contracts.<sup>164</sup> Such measures included authorizing employers to reduce working hours. Inadequate wage protection is a risk factor for labour rights abuses, requiring FIFA and contractors on stadium construction sites to exercise heightened due diligence in ensuring that all workers’ wages are protected in line with international standards established in Convention 95 and 158.

At the intersection of government policies relaxing already limited wage protections in Qatar countries, and employer practices of displacing economic shocks onto their workforce, the migrant construction workers 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.

162 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/wp-content/uploads/2021/07/Money-Heist\\_Book\\_Final-compressed.pdf](https://asia.floorwage.org/wp-content/uploads/2021/07/Money-Heist_Book_Final-compressed.pdf); 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>.

163 Art. 54 and Art. 66, Qatar Labour Law, available online at: <https://hukoomi.gov.qa/en/article/labor-law>.

164 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](https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/briefingnote/wcms_744832.pdf).

**Table 5: Employment practices and wage theft outcomes on FIFA World Cup 2022 Stadiums**

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

**Non-payment, late payment, or underpayment of wages**

An Indian worker employed by HBK Contracting as a helper in the stone cutting section, working on Al Bayt Stadium, reported that he did not receive wages during the pandemic:

*The situation here was very bad during the pandemic. There were many problems for people to live, eat and drink water. Many people were forcibly discharged. And the salary of that time was not even given. Forced work was used in the lockdown. I have not yet received my salary from the time of the pandemic.*<sup>165</sup>

An Indian construction worker employed by HBK Contracting Company on Lusail Stadium confirmed

that no one at their company received wages during the pandemic:

*No one got salary during the pandemic. Many workers were sent home without their wages. Even before, our salary was not paid on time and full overtime was not paid. If I worked two overtime hours, I was only paid for one hour. They used to call us in to work even during our weekly holiday. When I was fired, they did not give me my gratuity or last month’s salary.*<sup>166</sup>

A Bangladeshi Worker employed by Advanced Construction Technology Services on Al Rayyan and Education City Stadiums described spending two months in company accommodations without being provided with salary or food when movement

165 An Indian worker employed as a helper in the stone cutting section, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

166 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

from their accommodation was restricted by the government:

***Our company accommodation was blocked by the government for two months. We couldn't go outside. The company didn't help us at all during this situation. They didn't provide us with salaries or with food. We were very hungry. This time was very painful.***<sup>167</sup>

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium reported not receiving full wages during the lockdown period:

***Our salary was reduced during the lockdown. Most workers remained in the accommodation during that period so the company did not pay our full salary.***<sup>168</sup>

A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—described receiving a salary lower than promised:

***I am supposed to get 42,000 taka (\$416) salary, but I get only 30,000 takas (\$297). I do not get paid for overtime work and I work from six am to six pm seven days a week. I do not get sick leave or annual leave. I did not get my promotion. We have nowhere to report these violations.***<sup>73</sup>

A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt Stadium reported receiving delayed wages during the COVID-19 pandemic:

***During the COVID-19 pandemic we were forced to go to work. Our salaries were paid late.***<sup>169</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium reported that he did not receive wages for two months during the COVID-19 pandemic:

***Suddenly, COVID-19 hit and we were in lockdown. We were stuck at the camp for two months and did not go to work. We did not get paid for two months. The company only gave us a food allowance.***<sup>170</sup>

The same worker also reported routine delays and underpayment of wages, even following the pandemic:

***Even today there are delays in our salary payments. Sometimes the salary is less than we are expecting. When we complain, they say they will add it to next month's salary, but they do not add these even in the next month.***<sup>171</sup>

167 A Bangladeshi Worker employed by Advanced Construction Technology Services on Al Rayyan and Education City Stadiums, interviewed in Qatar, May 2022.

168 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

169 A Bangladeshi worker employed as a digital print designer by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

170 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

171 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

## Unpaid overtime



A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums described extended working hours without overtime pay:

***I worked 14 hours a day, from six am to eight pm. I did not get any overtime payment. Overtime payment was promised at 1.8% but I never received it. I worked seven days a week. Any time they called me, I would have to go.***<sup>172</sup>

An Indian worker employed by HBK Contracting as a helper in the stone cutting section, working on Al Bayt Stadium, also described unpaid overtime:

***When overtime is worked for two hours, we are only paid for one hour.***<sup>173</sup>

A Kenyan worker employed by HBK on Lusail Stadium described working fourteen-hour days without paid overtime for over two years:

***I worked for fourteen hours a day with a thirty-minute lunch break. We ate while standing. I had no time to catch my breath or rest during these long shifts. There was no overtime pay. Given the volume of work, they should have paid me much better.***<sup>174</sup>

### Protecting workers’ rights to paid overtime—good practices from FIFA World Cup Qatar 2022 construction company partners

A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium reported receiving overtime wages.<sup>175</sup>

## Wages lower than promised

A Nepalese worker employed by HBK on Lusail Stadium described being promised a higher salary than he was given:

***When we interviewed in Pokhara, Nepal, a manager from HBK engineering, an Indian national, came to do the interview. 260 people gave an interview there. During the interview he told us we would get 800 rials (\$219.70) for our basic salary. Additionally, he promised us free food and accommodation worth 200 rial (\$54.93). The agency also told us that we could get an additional 200 rial (\$54.93) as a bonus. When we got the contract, it said only 750 rials (\$205.97). When we reached, I learned that an additional 150 rials (\$41.19) would be deducted for food. My salary was 600 rials (\$164.78). I earned an extra 200 (\$54.93) from working overtime.***<sup>176</sup>

An Indian worker employed by HBK on Lusail Stadium as a helper in the stone cutting section, working on Al Bayt Stadium, described receiving wages lower than he was promised at the time of recruitment:

***The employer did not comply with the verbal promise. My agent said that I would get 2,000 rial (\$549.26) salary, but that did not happen. I am only getting 1,200 (\$329.56) basic salary.***<sup>177</sup>

<sup>172</sup> A Bangladeshi worker employed as a technician by Advanced Construction Technology Services on Al Bayt, Khalifa International, and Lusail Stadiums, interviewed in Qatar, May 2022.

<sup>173</sup> An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

<sup>174</sup> A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

<sup>175</sup> A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, November 2021.

<sup>176</sup> A Nepalese worker employed by Hamad Bin Khalid Engineering Company WLL (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

<sup>177</sup> An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium reported wages lower than what he was promised at the time of recruitment:

***I was told that I would get 1,200 Rial (\$329.56) as my basic salary, but when I came here they took my oral interview instead of a practical interview and told me that I was not qualified. They decreased my salary.***<sup>178</sup>

## **Non-payment or underpayment of severance**

A Bangladeshi worker employed to work as a head designer on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifah International Stadiums reported company measures to sidestep end of service entitlements:

***The company never fires anyone, but when a worker is forced to leave the country due to irregular pay and various other difficulties, the company doesn't give a real account. If someone wants to file a lawsuit in the Labor Court, they are told in various ways that it will take a long time to file a lawsuit, so take what we give you.***<sup>179</sup>

An Indian construction worker employed by HBK Contracting Company on Lusail Stadium reported that he and others did not receive severance pay:

***The company did not provide end of service benefits to me and many other workers.***<sup>180</sup>

An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium also reported workers being fired without severance pay:

***The company sent many people on forced leave without any notice. At that time most of the workers did not get end of service entitlements.***<sup>181</sup>

178 Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, July 2022.

179 A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

180 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

181 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

## Illegal Recruitment

### Recruitment fees, remittances, dependents, and debt

Workers employed at FIFA World Cup Qatar 2022 stadiums described recruitment fees as routine.

A Bangladeshi Worker employed by Advanced Construction Technology Services on Al Rayyan and Education City Stadiums reported that he paid USD 4,500 in recruitment fees.<sup>182</sup>

A Kenyan worker employed by HBK on Lusail Stadium described high recruitment fees requiring him to take a loan that he was not able to repay:

***I paid 15,000 shillings (Kenyan Shillings) as a recruitment fee (USD 124). I took a loan to cover the costs.***<sup>183</sup>

A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—described the stress associated with high recruitment fees:

***I took the recruitment fees from my family. I was so determined to pay back that 3 lakhs taka (3,00,000 BDT/2,899 USD) in one year, and I did it. I worked so much in the first year that it is unimaginable. I was constantly thinking, how can I earn more to pay back my family. I used to do overtime work 7 days in a week. I would work 87-98 hours in a week.***<sup>184</sup>

A Bangladeshi worker employed as an office administrator and working for the Salini Impregilo Group on Al Bayt Stadium, described paying significant recruitment fees:

***I paid 380,000 takas (\$3,762) in recruitment fees.***<sup>185</sup>

Another Bangladeshi worker employed by Salini Impregilo Group on Al Bayt Stadium also described paying recruitment fees:

***I paid 350,000 takas (\$ 3,465) in recruitment fees.***<sup>4</sup>

A Bangladeshi worker employed to maintain the turf at Al Janoub Stadium, hired by Al Sulaiteen Agricultural and Industrial Complex, reported paying 10,000 BDT (\$99) in recruitment fees.<sup>186</sup>



SAIC responded to these allegations:

***A. SAIC recruit its workers only through overseas manpower agencies approved by the Ministry of Labour (MoL).***

***B. SAIC proceed on recruitment online through overseas Qatar visa centre (QVC) and settle all QVC payment online (visa fees, medical checks, etc. . .)***<sup>187</sup>

A Nepalese worker employed by HBK on Lusail Stadium described paying recruitment fees and being issued a receipt for only a fraction of the amount paid:

182 A Bangladeshi Worker employed by Advanced Construction Technology Services on Al Rayyan and Education City Stadiums, interviewed in Qatar, May 2022.

183 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

184 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

185 A Bangladeshi worker employed as an office administrator, working for the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021.

186 A Bangladeshi worker who maintains turf grass at Al Janoub Stadium, employed by Al Sulaiteen Agricultural and Industrial Complex, interviewed in Qatar, May 2022.

187 RE: M/s Equidem mail dated 24th October 2022, via email to Equidem on October 31, 2022, included in the Annex to this report

***Pukar manpower gave us the ticket and other documents including the contract just one day before the flight, on March 18, 2019. They asked us to pay the recruitment fee. We paid 115,000 rupees (\$875.05) in cash in Pokhara. We came to Kathmandu after that. Pukar manpower issued a receipt for 10,000 (\$76.09) only. There were 21 of us at the office at the time. We started protesting. We asked why we are getting receipt for 10,000 (\$76.09) only. They replied ‘Do you want to go or not? This is our fee for visa. If you say anything to the immigration at the airport about this receipt, they will send you back. You will lose your money.’ It took me 11 months to pay back the loan I had taken to pay the recruitment fee.***<sup>188</sup>

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium also described paying recruitment fees and being made to attest that he had paid much less:

***First the agent asked for 130,000 rupees (Nepalese Rupees) (\$989.18). Then the agent said 125,000 rupees (\$951.14). I was asked to say that I had paid only 10,000 rupees (\$76.09) for the video. If I did not, they would not let me go.***<sup>189</sup>

A Kenyan worker employed at Regency Security Services on Stadium 974 said she had to pay 150,000 shilling (1,233) in recruitment fee.

***“...the recruitment fee amounted to 150,000 KSHS / 1,233 USD / 4,490 QAR. There is the commission which was 120,000 KSHS/987 USD /3,593 QAR, then the rest was for Visa, good conduct, Covid PCR tests and all necessary medical tests. My mother helped me raise the whole amount.”***<sup>190</sup>

Other Kenyan workers employed at Regency Security Services on Stadium 974 also said they had to pay 150,000 shilling (USD 1,233) in recruitment fee.<sup>191</sup>

### **Good practices—Supreme Committee for Delivery and Legacy (SC) measures to address illegal recruitment fees**

The SC reports taking measures to tackle the challenge of illegal recruitment fees. In a letter to Equidem dated October 31, 2022, the SC explained these steps in detail:

***Charging recruitment fees is illegal by international law and Qatar Labour Law and prohibited by the WWS. In order to tackle this challenge, the SC introduced the recruitment fees reimbursement programme as a remedy for workers who were charged illegal recruitment fees in their home countries, shifting the burden of proof from worker to employer. 266 contractors have voluntarily signed up to the programme and have so far reimbursed QAR 84.7M to 49,286 SC and non-SC workers.***<sup>192</sup>

In order to further extend the impact of this programme beyond the 266 contractors who affirmatively opted into the programme, the SC should work with immigration in both sending and receiving countries to ensure that all workers are notified that fees are illegal and have an option to file a complaint if they have been charged fees immediately upon entering the country. Moreover, given the practice of workers being refused accurate receipts for payments by recruitment intermediaries, workers should not be required to furnish receipts as a condition of reimbursement.

188 A Nepalese worker employed by Hamad Bin Khalid Engineering Company WLL (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

189 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, August 2022.

190 A Kenyan worker employed by Regency Security Services at Stadium 974, interviewed in Kenya, October 2022.

191 Three Kenyan workers employed by Regency Security Services at Stadium 974, interviewed in Kenya, October 2022.

192 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

## Deception in recruitment

An Indian worker employed by HBK Contracting Company on Lusail Stadium reported distinct working conditions from those he was promised at the time of recruitment:

***The recruitment agent told me that I would get free meals, but there is no provision for free meals in the contract. The money from food is deducted from our salaries but the food is not nutritious. To take care of my health, I buy fruits with my own money.***<sup>193</sup>

An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, also reported deception in recruitment:

***The agent told me that I would earn a salary of 2,500 rial (\$686.58), but I only received 2,000 rial***<sup>194</sup> ***(\$549.26).***

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium reported wages lower than what he was promised at the time of recruitment:

***I was told that I would get 1,200 rial (\$329.56) as my basic salary, but when I came here they took my oral interview instead of a practical interview and told me that I was not qualified. They decreased my salary.***<sup>195</sup>

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium described receiving wages lower than promised:

***I was promised 1,200 rials (329.56) as my salary but I am getting 1,000 rials (\$274.63). The agents duped me.***<sup>196</sup>

A Kenyan worker employed by HBK on Lusail Stadium also described being paid less than he was promised at the time of recruitment:

***I was promised higher pay, but then I was paid only 30,000 shillings (Kenyan Shillings) (USD 248).***<sup>197</sup>



Another Kenyan worker employed by HBK on Lusail Stadium reported deception in the nature of job during recruitment:

***I just found myself in a construction site and was told to work, I didn't sign up to work in the construction sector.***<sup>198</sup>

193 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

194 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interview in Qatar, August 2022.

195 Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, July 2022.

196 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, August 2022.

197 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

198 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

## 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.

### Wage theft as an indicator of forced labour

An Indian worker employed by HBK Contracting as a helper in the stone cutting section, working on Al Bayt Stadium, reported that he did not receive wages during the pandemic:

*The situation here was very bad during the pandemic. There were many problems for people to live, eat and drink water. Many people were forcibly discharged. And the salary of that time was not even given. Forced work was used in the lockdown. I have not yet received my salary from the time of the pandemic.*<sup>199</sup>

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 remuneration, 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.

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 has 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.

<sup>199</sup> An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

## Withholding identity documents as an indicator of forced labour

The practice of withholding identity documents is also an indicator of forced labour because without identity documents, the worker cannot seek alternate employment or even leave the country.

An Indian worker employed by HBK Contracting as a helper in the stone cutting section, working on Al

Bayt Stadium, explained that his passport was held by his employer:

**“My passport is deposited with my employer.”<sup>200</sup>**

Other migrant workers employed by HBK Contracting Company on Lusail Stadium also reported that their passports were held by the company.<sup>201</sup>

## Understaffing and Overwork

A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—reported understaffing and overwork:

**There are 70-80 people in this department. The company should recruit more people to manage the work. We have a lot of work pressure, it is inhuman. I work from six am to six pm. I have a one-hour lunch break. Our work pressure was so high that I did not have scope to take even a tea break. We have targets we have to meet.**<sup>202</sup>

A Ugandan migrant employed by Salfo Engineering and Management Consultants at Education City Stadium reported working more than twelve hours every day of the week without overtime pay, even though his contract specified an eight-hour working day:

**We have very long working hours, at the site, we always work more than 8 hours a shift and take very short breaks for lunch.**<sup>203</sup>

A Bangladeshi labourer employed by HBK reported working for an entire month without a day of rest in order to meet FIFA construction deadlines:

**We are forced to keep working. The Supreme Committee project for the FIFA World Cup needed to finish by 2022, so we work without even one day off a month.**<sup>204</sup>

An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, described excessive work:

**I have night duty and I rest during the day. I go to duty at around eight at night and come back from duty at seven to my room. There are 15 people in my group. There is too much work and not enough workers. There are no regular breaks. When the work is over, then you get a break, or when the supervisor calls for lunch. There is no drinking water system at work, drinking water is a little far away.**<sup>205</sup>

200 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

201 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022; An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022; A Kenyan worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, October 2022.

202 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

203 A Ugandan worker employed by Salfo Engineering & Management Consultants as a mason on Education City Stadium, interviewed in Qatar, September 2022.

204 A Bangladeshi labourer employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022.

205 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

An Indian construction worker employed as an electrician by HBK on Lusail Stadium also described a relentless pace of work:

***Supervisors are very strict and they do not give us time to rest. Even if there is no electrician work for me to do, the supervisor will assign me other work helping in other departments.***<sup>206</sup>

A Bangladeshi construction technician employed by Advance Construction Technology Services on Al Bayt, Lusail, and Khalifa Stadiums described an increased workload during the COVID-19 pandemic as other workers fell ill:

***The COVID-19 pandemic had a devastating effect. As workers fell sick, we were forced to do the work of others. If we did not, we were threatened. Many of us tested positive. At one point the work of four or five workers was done by one person.***<sup>207</sup>

A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums also reported an increase in workload during the pandemic:

***Bangladeshis were put under a lot of pressure. In many cases we had to do other people’s work and supplementary work.***<sup>208</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium described an unmanageable workload:

***There are only twelve workers per shift at this stadium and Lusail Stadium is still under construction. It is the final venue for FIFA World Cup 2022 with 800,000 seating capacity. It is impossible for twelve security guards to control that type of space.***<sup>209</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium also described an unmanageable workload despite more workers on his shift:

***There are eighteen workers per shift in this stadium. It is a venue for the FIFA World Cup 2022 with 40,000 seats capacity. It is not possible for us to control and manage this space during our duty time.***<sup>210</sup>

206 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

207 A Bangladeshi construction technician employed by Advance Construction Technology Services on Lusail, Khalifa, and Al Bayt Stadiums, interviewed in Qatar, January 2022.

208 A Bangladeshi worker employed as a digital print designer by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

209 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium, interviewed in Qatar, April 2022.

210 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

## Workplace violence

### Physical violence

A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL (J&P)—on Education City Stadium, described physical violence on the construction site:

***One time I saw the supervisor of J&P pick up a wooden block to hit the mason. He was angry because the mason did not complete his work on time.***<sup>211</sup>

A Kenyan worker employed by HBK on Lusail Stadium described routine physical violence with no avenue for relief:

***Supervisors would hit us in front of other workers to pressure us to work faster and complete our work on time. This physical abuse was never addressed. You could report but nothing would happen because the perpetrators were our supervisors.***<sup>212</sup>

An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, reported that he faced physical abuse at work:

***There is a lot of discrimination going on here. My job is that of a stone helper, but they also ask me to clear garbage and do cleaning work. If you refuse, sometimes they will slap you. There is no one to listen here.***<sup>213</sup>

An Indian construction worker employed by HBK on Lusail Stadium also described regular physical abuse in his department:

***Incidents of abuse, threats, and violence are common here. Most of the violence used to happen in my department. No one can rest while on duty. If a worker is found sitting or resting, even for a few minutes, they face abuse and violence.***<sup>214</sup>

### Verbal abuse

A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium described verbal abuse from his foreman:

***Our foreman would scold and become loud on us when we made a mistake. They threatened to mark us absent if we made an error. This happened to my friends, but I was never marked absent.***<sup>215</sup>

A Nepalese worker employed as a scaffolder by Joannou & Paraskevaides Qatar WLL on Education City Stadium described verbal abuse from supervisors:

***The supervisor yells at us if we don't complete our work on time.***<sup>216</sup>

An Indian gardener employed by IMAR Trading & Contracting Co WLL on Lusail Stadium described verbal abuse:

***Sometimes I see supervisors yelling at workers if they make a mistake.***<sup>217</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium described routine verbal abuse:

***If we do not complete our work on time, the supervisors yell at us. They threaten to cut our overtime. Yelling is common. We are used to it.***<sup>218</sup>

211 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

212 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

213 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

214 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

215 A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, April 2022.

216 A Nepalese worker employed as a scaffolder by Joannou & Paraskevaides Qatar WLL on Education City Stadium, interviewed in Qatar, April 2022.

217 An Indian gardener employed by IMAR Trading & Contracting Co WLL on Lusail Stadium, interviewed in Qatar, June 2022.

218 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL—as a fire and safety officer also described verbal abuse:

***When I joined the company, the supervisors were rude and strict with me. There are supervisors who behave badly to ground level workers—especially supervisors who have contact with labourers.***<sup>219</sup>

A Kenyan worker employed by HBK on Lusail Stadium also described routine verbal abuse:

***It was very common to be insulted, shouted at, and rushed throughout our fourteen-hour shift.***<sup>220</sup>

An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, described routine verbal abuse from supervisors:

***The supervisors here are very rude. They shout and abuse when workers drink water and go to the toilet. This is a daily, common thing. Workers can't rest for even two minutes on duty. If you are found resting, you hear abuses. This has happened to me many times.***<sup>221</sup>

An Indian construction worker employed by HBK on Lusail Stadium also described regular verbal abuse:

***Supervisors shout and abuse workers. If a migrant worker is even two minutes late—while standing or sitting, resting, or if we take too long to eat food, drink water, or come from the washroom—then the supervisors start shouting at the worker. This is mostly faced by laborers, sweepers, and other workers doing hard physical labour. Supervisors also shout at us if the work is incomplete. Even if there are not enough workers to complete the workload, we have to listen to supervisors' harsh words.***<sup>222</sup>

An Indian worker employed as an electrician by HBK on Lusail Stadium, described the same pattern of routine verbal abuse:

***Here, all the supervisors treat us the same way. No matter how well the workers do their work, it is not appreciated. But if we go to rest or take time to eat food, drink water, come from the toilet, they start shouting. They shout if the work is not completed on time, but there are too few workers sometimes to complete the work. How can we finish it quickly? Helpers, labourers, and sweepers work the hardest and face the most abuse.***<sup>223</sup>

A Nepalese carpenter, employed by HBK on Lusail Stadium described rude behavior from supervisors:

***If we do not complete the target work set by the supervisor or foreman, they behave rudely. It is normal for us.***<sup>224</sup>

A Bangladeshi worker employed as a quality control assistant by HBK described daily verbal abuse in his department as well:

***I get yelled at and spoken to rudely every day. They shout at me because I am an assistant.***<sup>225</sup>

219 An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL, interviewed in Qatar, May 2022.

220 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

221 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

222 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

223 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

224 A Nepalese carpenter, employed by Hamad Bin Khalid Contracting Company WLL on Lusail Stadium, interviewed in Qatar, April 2022.

225 A Bangladeshi worker employed as a quality control assistant by HBK on Lusail Stadium, interview in Qatar, May 2022.

## Mental harm, stress and suffering – threats and cultures of fear

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described threats of termination and cancelling an entire day’s salary for making mistakes on site:

*Sometimes the supervisor and foreman threaten to cut our salary or cancel our attendance for the full day if we mess up any work. This hasn’t happened to me yet, but I have seen it happen to other workers.*<sup>226</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium described receiving threats from his supervisor for resting:

*Once when I was at work, I got very tired and needed to take a break. The camp boss came up to me and threatened to cut my salary for two days. He even threatened to send me back home.*<sup>227</sup>

A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium also described threats from supervisors:

*They threaten to cut our wages or mark us absent if we make any mistakes.*<sup>228</sup>

A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium described facing similar threats and stress at work.<sup>229</sup>

A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—described mental harm due to workplace stress:



Workers on Lusail Stadium, where the final of the FIFA World Cup Qatar 2022 will be played, described experiencing tension and exhaustion because of their working and living conditions. © Equidem 2022

*I face mental abuse. If we make any mistakes, they give us extra work, or even give us work from a different sector which we are not able to do. The threat of losing our job was not vocal, but there was something—I can’t describe it to you—but we were always in fear of losing our jobs.*<sup>230</sup>

An Indian worker employed as an electrician by HBK on Lusail Stadium, also described psychological consequences of working in this environment:

*The job and environment cause mental pain. There is always a feeling of tension and exhaustion in our minds and bodies.*<sup>231</sup>

226 Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

227 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

228 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

229 A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

230 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

231 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium described regular threats from his supervisor and foreman:

***Our supervisor threatens us if we make any mistakes. He threatens to take away our payment for the whole day by marking us absent.***<sup>232</sup>

## Health and Safety Risks



Khalifa International Stadium, Doha, Qatar. © Equidem 2022

The Supreme Committee for Delivery and Legacy (SC) reports that workers’ health and safety has been a top priority. In a letter to Equidem dated October 31, 2022, they described a range of SC initiatives:

***We have introduced a range of measures such as nutrition programme, comprehensive medical screenings, electronic medical records system, training and upskilling, mental health and cardiac pathways that have revolutionized healthcare for workers on our programme. We have also addressed heat stress by establishing robust mitigation measures early on across all our sites,***

***which includes deployment of revolutionary cooling suits to protect workers against heat stress during summer. Our health and safety standards are on par with, if not better than, many construction projects in Europe and North America – a fact the global trade union Building and Wood Workers’ International (BWI) recognizes and have publicly attested to.***<sup>233</sup>

Despite the initiatives described by the SC, however, workers described significant risks to their health and safety posed by excessive heat and cold, occupational hazards that are exacerbated by overwork, and exposure to COVID-19. The impact on workers’ health is further compounded by inability to obtain and afford nutritious food. These findings suggest that programmes described by the SC did not extend to protecting the full labour force on FIFA World Cup Qatar 2022 stadiums. For instance, not one worker we spoke to across all stadiums described access to cooling suits—instead, they described lack of basic shelter and even difficulty accessing water. While the standards described by the SC might be on par with health and safety standards in the Europe and North America, gaps in enforcement across all contractors engaged on FIFA World Cup Qatar 2022 projects allowed rights violations to go unchecked.

232 A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium, interviewed in Qatar, April 2022.

233 Supreme Committee for Delivery and Legacy, “Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites,” Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

## Excessive heat and cold

A Bangladeshi worker who maintains turf grass at Al Janoub Stadium—employed by the contractor, Al Sulaiteen Agricultural and Industrial Complex—described health risks associated with maintaining turf grass:

***There are health and safety risks in maintaining the grass. We worked outside as landscapers through the summer and it’s much too hot. In the winter, it is very cold with heavy winds. This is an empty desert area so there are heavy winds and a lot of dust. This has an impact on our health.***<sup>234</sup>

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium described the health consequences of working in intense heat:

***The temperature is very high. In the summer season, it rises to 50 degrees. Heatstroke and dehydration are common here.***<sup>235</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium described occupational health and safety risks:

***This job has a lot of negative impacts on our health. Our duty is both inside and outside so now that it is summer, we will become black from the burning sun. On the other hand in winter season, it’s much too cold in Qatar with heavy winds. These extreme temperatures impact our health.***<sup>236</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium also described extreme temperatures:

***We did our duty for one year and six months outside the stadium premises. During the summer time, April to August, in Qatar the temperature is 45 to 55 degrees outside. We did our duty with no cabin and not even a sun sheet. On the other hand, in winter season, September to March, it is cold with heavy wind. The company forced us to be outside to do our work.***<sup>237</sup>

An Indian worker employed by IMAR Trading & Contracting Co WLL, erecting safety barricades at Al Bayt and Lusail Stadiums also described climate related safety concerns:

***I think the climate is not good for our health because it’s very hot here. There is risk of dehydration and other health issues.***<sup>238</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadiums described environmental health risks:

***The temperature in Qatar in the winter and summer is extreme. There is too much sun heat that burns our skin and face. In the summer it makes us dehydrated. In the winter, it is very hard to stay outside for such long hours and there is no security cabin. The situation is the same for security guards in Al Bayt, Lusail, Al Janoub, and Al Rayyan Stadiums.***<sup>239</sup>

A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician—testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums—described the toll of extended working hours and high work pressure:

234 A Bangladeshi worker who maintains turf grass at Al Janoub Stadium, employed by Al Sulaiteen Agricultural and Industrial Complex, interviewed in Qatar, May 2022.

235 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

236 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

237 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

238 An Indian worker employed by IMAR Trading & Contracting Co WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, May 2022.

239 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, April 2022.

*During those three years, I suffered from various physical problems—I was dehydrated due to lack of water and I did not have nutritious food. We had a water supply and we could take a break to drink water, but we didn’t because of the pressure to meet our work targets. I had no social life. I worked all day seven days a week.*<sup>240</sup>

An Indian construction worker employed by HBK on Lusail Stadium described the health consequences of his work:

*There was no regular break. We could collect drinking water, but we had to carry a bottle with us. We could not go to fill our bottles again and again. The heat was so high that the water bottles got hot and we had to drink hot water. Cold water was only available at lunchtime or after work was over. We did not get a break to rest our bodies, and the negative environment caused mental pain and distress. We were always fatigued.*<sup>241</sup>

A Bangladeshi labourer employed by HBK reported feeling weak from working in the heat:

*Sometimes I feel weak because it is just too hot outside on the sites where we work*<sup>242</sup>.

An Indian worker employed as an electrician by HBK on Lusail Stadium described challenges getting adequate drinking water:

*There is no good facility for drinking water here. Now water coolers have been installed but before there was a plastic bucket that was filled with ice. The ice would melt slowly. This prevented the workers from drinking too much.*<sup>243</sup>

### Good practices for safeguarding worker health from excessive heat

An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL—as a fire and safety officer described company practices of shifting his working hours to avoid the hottest hours of the day:

*Now the climate is changing and in coming days the temperature will be increasing. Considering the risk of heat stroke and dehydration, our working hours will change from 6 am till 10 am and then we will get a break time until 4 pm evening. We will then resume the work at 4 pm till 9 or 10 pm.*<sup>244</sup>

### Occupational hazards

An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadiums described health risks specific to his work:

*I work in the cement mixing area. Frequent contact with cement leads to problems with our skin. We take measures to reduce the exposure, but our job still requires us to be in frequent contact with these materials.*<sup>245</sup>

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium described the health consequences of working on dusty construction sites:

*Our work is on a construction site so there is too much dust. This causes breathing problems. When we go to the washroom, dust comes out of our noses and mouths.*<sup>246</sup>

240 A Bangladeshi worker employed by Advanced Construction Technology Services as a lab technician, testing material on a range of stadium sites including Al Bayt, Khalifa, and Lusail Stadiums, interviewed in Qatar, May 2022.

241 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

242 A Bangladeshi labourer employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022.

243 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

244 An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL, interviewed in Qatar, May 2022.

245 An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadium, interviewed in Qatar, June 2022.

246 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

A Nepalese worker employed as a mason by Al Jaber Engineering WLL on Al Thumama Stadium described occupational health and safety risks associated with his work:

*I have to make walls, blocks, and plaster. I wear a mask but the dust enters my body anyway. I'm scared that I will get chest problems in the future. Whenever we have to use joining bond chemical to mix with the cement, if we are not careful, it causes an allergic reaction.*<sup>247</sup>

### Inability to obtain and afford nutritious food

Occupational health and safety risks are exacerbated by poor nutrition. A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium described the food he received from the company as lacking in nutrition:

*The food is free from the company, but it is not nutritious. It also does not taste good.*<sup>248</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium described difficulties with company food:

*The company provided us food from the money we earn. We have a food allowance of 300 rials (\$82) per month. But the company management provides us cheap food without enough calories and nutrition every day. We have complained many times about our food problem, they do not take any action. The issue us warning letters instead.*<sup>249</sup>

An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadiums reported that he was unable to buy nutritious food:

*On my salary, I am not able to buy nutritious food.*<sup>250</sup>

### Exposure to COVID-19

The Supreme Committee for Delivery and Legacy (SC) reports that workers' health and safety was a top priority during the COVID-9 pandemic. In a letter to Equidem dated October 31, 2022, they described a range of SC initiatives to curb the spread of COVID-19

*Workers' safety remained a top priority throughout the COVID-19 pandemic. All workers received free masks, sanitizers and health checks. Our comprehensive medical screenings and electronic medical records system enabled us to identify high-risk workers and provide them tailored treatment plans for their healthcare management. All these workers continued to receive their salaries along with free food and accommodation. The SC carried out several periodic inspections to ensure that Qatar's Ministry of Public Health (MOPH) guidelines with respect to COVID (i.e. masks, social distancing, testing etc.) are being adhered on the sites. We also ensured that WWF continued online to raise awareness on COVID-19 regulations and also introduced a mental health awareness campaign to support workers. Over 810 WWF were conducted online during the pandemic.*<sup>251</sup>

Despite the initiatives described by the SC, however, workers described high levels of exposure to COVID-19, and some workers even described being required to obtain their own masks and sanitizers. On the other hand, other workers described access to health services, worksite precautions, and safer accommodations. These findings suggest that the standards proscribed by the SC were unevenly upheld by contractors and that failure to uphold these standards went largely undetected. These gaps in enforcement allowed rights violations to go unchecked.

247 A Nepalese worker employed as a mason by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

248 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

249 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

250 An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadium, interviewed in Qatar, June 2022.

251 Supreme Committee for Delivery and Legacy, "Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites," Letter to Equidem, dated October 31, 2022, Ref. No. SC-WWD-PRW-LET-EQD-22-2018. For the full response from the Supreme Committee for Delivery and Legacy, see the Annexes to this report.

## Exposure to COVID-19

### Health risks on stadium sites and in transit to work

Migrant workers employed by Salini Impregilo Group on Al Bayt Stadium described working through the pandemic.<sup>252</sup> They reported continuing work despite risks to their health. According to worker accounts between 200 and 250 construction workers on Al Bayt Stadium contracted COVID-19.<sup>253</sup> Other workers on this site described even greater numbers. According to one worker employed by HBK Contracting: “Hundreds of people were infected in our company.”<sup>254</sup>

An Indian worker employed by IMAR Trading & Contracting Co WLL on Lusail Stadium as a safety officer reported knowing of at least 250 workers who tested positive out of the total 3,500 workers on Lusail Stadium.<sup>255</sup>

A Bangladeshi construction technician employed by Advance Construction Technology Services on Al Bayt, Lusail, and Khalifa Stadiums described being forced to work against his will:

***During COVID-19, I was forced to work during the lockdown. I tried to stay home but the company forced me to go work. The whole of Qatar locked down, and I was terrified of the coronavirus. I was sent to work on different sites, and I became corona positive. I wasn't given proper treatment. The company always kept a distance from me***

***once I fell sick. I had fever and unbearable pain all over my body. I did not have good medicine or treatment.***<sup>256</sup>

A Bangladeshi Worker employed by Advanced Construction Technology Services on Al Rayyan and Education City Stadiums described being forced to work during COVID-19 lockdowns:

***During the lockdown our company pushed us to continue work. If any worker didn't want to work during lockdown, the company terminated this worker. I know twenty workers who contracted COVID-19. A few of them had very critical cases.***<sup>257</sup>

A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium described exposure to COVID-19 on site:

***I work in a group, so there is a risk of contracting COVID-19 on site. We also share the bus to bring us to the site.***<sup>258</sup>

A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium described similar on-site exposure. As a result, he explained:

***“I know forty or fifty people from my company got sick.”***<sup>259</sup>

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium described COVID-19 risks on site:

252 A Bangladeshi worker employed as an office administrator, working for the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021; A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021.

253 A Bangladeshi worker employed as an office administrator, working for the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021; A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021; A Bangladeshi worker employed as a cleaner by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, March 2022.

254 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

255 An Indian worker employed by IMAR Trading & Contracting Co WLL on Lusail Stadium as a safety officer, interviewed in Qatar, May 2022.

256 A Bangladeshi construction technician employed by Advance Construction Technology Services on Lusail, Khalifa, and Al Bayt Stadiums, interviewed in Qatar, January 2022.

257 A Bangladeshi Worker employed by Advanced Construction Technology Services on Al Rayyan and Education City Stadiums, interviewed in Qatar, May 2022.

258 A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium, interviewed in Qatar, April 2022.

259 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

***During the pandemic, we had to work on site. The company announced safety measures—that we needed to use face masks, sanitizers, keep a social distance of two meters, wash our hands with soap. These were never followed. I know around twenty-five workers who fell sick with COVID-19.***<sup>260</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt Stadium described high levels of risk during COVID-19:

***During the COVID-19 pandemic, I was at Al Bayt Stadium and the stadium was under construction. My duty was at the main entrance or East Bridge of the stadium. Every day I checked at least 2000 worker IDs, the Ehteraz COVID-19 app, and then I registered them in a log book. I had to be close to so many workers during the pandemic and I was so scared. There was no social distance, they did not always have face masks. It was very risky for me.***<sup>261</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium also described high levels of exposure to COVID-19:

***My duty was at the main gate of the stadium. This means I had to deal with a large crowd entering the gate. I needed to check all the workers IDs and PTWs [permits to work]. I also had to register the workers and visitors details. It was very difficult for me to maintain social distance. Our company did not take safety steps to protect workers. Although the Qatar government announced that in buses, only 50% of seats should be full, our employer bused us at full capacity. Workers who refused to work under these conditions were terminated and deported.***<sup>262</sup>

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium also described exposure to COVID-19:

***COVID-19 was very risky. It took six months for us to get vaccines. Our company continued site work and we had to go to work every day. They sent us to work forcefully. We were very scared. We traveled to our duty location on a fully occupied bus with no social distance. We also had no social distance at the workplace. I know more than twenty workers who contracted COVID-19.***<sup>263</sup>

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described exposure to COVID-19:

***I work in a group so there is a risk of contracting COVID-19 on site.***<sup>264</sup>

An Indian construction worker employed by HBK on Lusail Stadium described being required to work without adequate safety precautions:

***The work continued during COVID-19 as well. All the workers were worried about corona but there was no help from the company. A worker was given one mask daily. If this was torn during work, the worker would not be given another mask. For our own safety, we used to buy masks and sanitizers with our own money. Social distancing was not followed at the residence or the workplace. The company stopped the mess hall and used to give us food in packets. The quality of the food was not good, but we still had to eat.***<sup>265</sup>

260 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

261 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt Stadium, interviewed in Qatar, April 2022.

262 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

263 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

264 Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

265 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

An Indian worker employed as an electrician by HBK on Lusail Stadium, also reported that he was required to work and not even provided with the PPE required to make it through work shifts:

***Work was on even in COVID. Workers were worried about corona, but we were given no help from the company. The company closed the canteen and gave us food in packets that was not fit to eat—it smelled foul as if the food was bad. They gave us one use-and-throw mask a day. It used to get dirty and wet with sweat while we worked. Even if our mask broke, they would not give us another mask. We had to buy masks and sanitizers with our own money. Social distancing was followed on the site, but not in transit or accommodations.***<sup>266</sup>

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium reported that ten out of twenty-five workers in his group contracted COVID-19.<sup>267</sup>

Workers employed by HBK Contracting on Al Bayt Stadium reported working through the pandemic, with breaks only to recover from illness before they were sent back to work. One worker explained:

***Work was off for a week. After that the work started. When the worker became ill, the people of the company used to stop the worker from going to work. As soon as his health got better, he used to be put back to work.***<sup>268</sup>

A Bangladeshi worker who maintains turf grass at Al Janoub Stadium—employed by the contractor, Al Sulaiteen Agricultural and Industrial Complex—also described reporting to work during the pandemic lockdowns despite exposure to COVID-19:

***The Qatar government enforced lockdowns during the pandemic, beginning in May 2020. At that time, our company sent us to work. We were told that this is a FIFA World Cup 2022 project and we***

***have to finish the work as soon as possible. During the pandemic it was hard to work at Al Janoub stadium. Some companies followed the lockdown rules, but not SAIC [Al Sulaiteen Agricultural and Industrial Complex]. They sent us to the site for daily work. It was really scary for all of us doing our duty during the pandemic, but we were helpless. We have a total of 30 workers for gardening, and five to seven of us fell sick.***<sup>269</sup>

SAIC countered these allegations. In response SAIC said:

***A. SAIC accommodation was not located on the government lockdown area.***

***B. SAIC during the lockdown period and even through the covid pandemic periods and until now has abide and fully implemented all Qatar government and Supreme Committee welfare regulations and standards. During all covid phases whether in the workers accommodation, during limitation of workers buses transportation capacities, workers welfare was implemented. Meanwhile, official working duties regulations was fully respected by SAIC and implemented including restricted working days and numbers of workers allowed to go to work. All this was done under strict supervision and surveillance of all related official authorities and Supreme Committee for Legacy (SC).***<sup>270</sup>

An Indian worker employed by IMAR Trading & Contracting Co WLL, erecting safety barricades at Al Bayt and Lusail Stadiums also described risks of contracting COVID-19:

***There is risk of getting infection, as we are many people working together.***<sup>271</sup>

266 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

267 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, July 2022.

268 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

269 A Bangladeshi worker who maintains turf grass at Al Janoub Stadium, employed by Al Sulaiteen Agricultural and Industrial Complex, interviewed in Qatar, May 2022.

270 RE: M/s Equidem mail dated 24th October 2022, via email to Equidem on October 31, 2022, included in the Annex to this report.

271 An Indian worker employed by IMAR Trading & Contracting Co WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, May 2022.

## Health risks at labour camps and in employer provided housing

An Indian construction worker employed by HBK on Lusail Stadium described overcrowded accommodations that heightened risks of contracting COVID-19:

***There was a lot of danger during COVID because eight to ten people lived in each room in the accommodation camp. Social distancing was not followed there. Many people used the same toilet. People had to line up to use the bathroom. At meal times, there was a lot of crowd and queues in the mess hall. Those who cooked themselves had to wait for hours for the stoves to be empty. It was very crowded. Workers used to buy masks and sanitizers with their own money. In my accommodation camp alone, twenty-five to thirty people were infected.***<sup>272</sup>

A Kenyan worker employed by HBK at Lusail Stadium described being made to share bathrooms with workers who had confirmed cases of COVID-19:

***The same accommodations were used for isolating workers with COVID-19. We used the same washing areas.***<sup>273</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium reported exposure to COVID-19 in worker accommodations:

***There are eight of us in the room. The room is very small. We do not have a mess hall. We cook our own food in the room and also eat there. The company does not provide masks and sanitizers. We have to buy them on our own.***<sup>274</sup>

A Bangladeshi worker employed as a gardener at Al Janoub Stadium, hired by Al Sulaiteen Agricultural and Industrial Complex, described living in crowded living conditions:

***Living conditions were not good during the pandemic, and even now. We live with eight people in each small room. There was no social distancing possible, even though the company did provide masks and sanitizers. I know at least fifteen people who were infected on our camp.***<sup>275</sup>

SAIC countered these allegations. SAIC wrote to Equidem and said:

***A. During the pandemic period and up to now workers welfare and living conditions are always according to welfare regulations and standards including but not limited to 4 workers/room, random covid test done on SAIC expenses, isolation rooms created for infected workers, permanent nurse present at accommodation.***

***B. Social distancing was implemented.***

***C. Signage in all languages was installed at workers accommodation showing precaution and prevention measures to be respected.***

***D. Company provided sanitation, masks and local company was hired to spray the accommodation facilities.***<sup>276</sup>

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium also described exposure to COVID-19 at the company accommodation:

***There is no social distancing in our living areas or the mess hall. We have seven workers in each room and some rooms have double beds. Sometimes the company provided masks and sanitizers, but not everyone used them and the company didn't monitor or enforce these protections.***<sup>277</sup>

272 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

273 An Kenyan construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, October 2022.

274 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

275 A Bangladeshi worker who maintains turf grass at Al Janoub Stadium, employed by Al Sulaiteen Agricultural and Industrial Complex, interviewed in Qatar, May 2022.

276 “RE: M/s Equidem mail dated 24th October 2022,” via email to Equidem on October 31, 2022, included in the Annex to this report.

277 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described exposure to COVID-19 at his accommodation and in transit to the site:

***In the accommodation camp too, we all share the mess hall and the bus to take us to the site.***<sup>278</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium described high levels of exposure to COVID-19 at his accommodation:

***It was not possible to socially distance at our living accommodations. We live with four people in a small room. At least two hundred workers are in a building. All them use the same washrooms, the same toilets, and the same mess hall***<sup>279</sup>.

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Bayt Stadium described high levels of risk at the labour camps during COVID-19:

***The living conditions were not good. Each room had four partners and there was no social distancing in the room. We shared one mess hall for all company staff. We shared the same bathroom and washroom. We shared the same transit. The government rules were to carry workers at 50% seat capacity but our company filled the bus to 100% capacity.***<sup>280</sup>

A Nepalese worker employed by HBK on Lusail Stadium also described unhygienic living conditions:

***There are six people in a room. The room is not big enough for six people to stay. Accommodation conditions are not so good. Bathrooms and toilets are not properly clean. When we return back to camp after our duty, we have to stand in queue for a shower. It takes one hour.***<sup>281</sup>

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium also described overcrowded living conditions:

***There are six people in a room. The company provides one wardrobe for two people An air conditioner was given, but it required maintenance and did not cool. We had to stay without the AC for periods of seven to ten days at a time when it is repaired.***<sup>282</sup>

An Indian worker employed by HBK as a helper in the stone cutting section, working on Al Bayt Stadium, also described cramped living conditions that exacerbated COVID-19 exposure:

***COVID-19 scared me a lot. I was very scared to hear the news of people’s death. The housing was filled with more people than its capacity. . . There is no social distance in the house at all. Here one has to line up for cooking, washing, bathing, and going to the toilet. At present, eight people live in my room.***<sup>283</sup>

Even in instances where room occupancy was lower, workers described challenges with social distancing in shared spaces. A Nepalese carpenter employed by HBK on Lusail Stadium described these challenges:

***There are four people in a room. The room is standard size with AC facility. Even then, it is difficult to maintain social distance at the site. Everyone usually leaves for work and comes home at the same time. It gets crowded then.***<sup>88</sup>

278 Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

279 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

280 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium, interviewed in Qatar, April 2022.

281 A Nepalese worker employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

282 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, July 2022.

283 An Indian worker employed as a helper in the stone cutting section by HBK Contracting, working on Al Bayt Stadium, interviewed in Qatar, August 2022.

## Inadequate medical care for workers who contracted COVID-19

An Indian construction worker employed by HBK Contracting Company on Lusail Stadium described unhygienic and unlivable quarantine centers at the camp:

*The condition of the quarantine centre was very bad. The toilet in the centre smelled very bad, there was no arrangement for clean drinking water nearby. The heat in the room was very high. The water was so hot that people could not take a bath.*<sup>284</sup>

## Lack of health insurance

A Kenyan worker employed by HBK as a mason on Lusail Stadium described having no access to medical care or insurance, and only being offered painkillers when he was unwell:

*When we were unwell, they only gave us Panadol (pain killer). I did not have medical coverage or insurance.*<sup>285</sup>

A Bangladeshi worker employed as a gardener at Al Janoub Stadium, hired by Al Sulaiteen Agricultural and Industrial Complex, reported that he was not provided with health insurance even though he worked daily during the pandemic:

*We have a health card for a medical checkup, but we do not have health insurance.*<sup>286</sup>

SAIC countered these allegations:

*A. According to Qatar labour law, SAIC provided health cards to all its workers which allow them to get all kind of treatments, medication and surgery if needed free of charge in the government health centres, clinics and hospitals.*

*B. All SAIC workers are covered within worker's compensation policy schedule which protects workers from any accident or personal injury or body injuries.*

*C. Official workers health insurance scheme is under study by the official authorities.*<sup>287</sup>

A Bangladeshi labourer employed by HBK on Lusail Stadium also reported that he did not have health insurance.<sup>288</sup>

## Challenges in accessing medical care and sick leave

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium described being threatened with termination for seeking sick leave:

*I have been threatened that I would lose my job for taking sick leave. If our health is not good and we request to take sick leave or take rest, our senior gives us a warning letter. I have also been threatened verbally that he will terminate me.*<sup>289</sup>

An Indian construction worker employed by HBK on Lusail Stadium described challenges accessing medical care and sick leave:

*Workers used to go to the hospital when they got sick. The company makes arrangements for transport and transportation to the hospital only in case of serious illness or in the event of the employee becoming unconscious or unable to walk or having an accident at the workplace. Workers in case of general illness used to go to the hospital at their own expense.*<sup>290</sup>

284 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

285 A Kenyan worker employed by HBK Contracting on Lusail Stadium, interviewed in Qatar, October 2022.

286 A Bangladeshi worker who maintains turf grass at Al Janoub Stadium, employed by Al Sulaiteen Agricultural and Industrial Complex, interviewed in Qatar, May 2022.

287 RE: M/s Equidem mail dated 24th October 2022," via email to Equidem on October 31, 2022, included in the Annex to this report.

288 Bangladeshi labourer employed by Hamad Bin Khalid Contracting Company (HBK) on Lusail Stadium, interviewed in Qatar, August 2022.

289 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

290 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

The same worker described discrimination against migrants by doctors and refusal to recommend rest, preventing them from taking sick leave:

***There was discrimination against the migrants in the hospitals. The migrants used to run from place to place to get care, and the doctors would deliberately delay the treatment of the migrants as they passed from room to room on their rounds. The whole day was spent. They used to wait for hours to get medicine. The doctors did not advise that migrants take rest, and so we could not get sick leave. Due to which the health of the workers was getting adversely affected. This was not the case with the local people.***<sup>291</sup>

Other workers also confirmed inability to take sick leave since doctors in Qatar did not provide written recommendations that they take rest for illness:

***The doctors here do not recommend rest for migrants for illness or exhaustion unless there is a serious illness. In the company, we cannot take sick leave or rest without a valid doctor’s advice. If we do take rest without a doctors advice, money will be deducted from our salaries.***<sup>292</sup>

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium described the requirement that workers present advice from a doctor before they are allowed to take sick leave:

***If you are not able to show a valid medical report confirming your sickness, they deduct leave from your monthly salary.***<sup>293</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium also explained that workers were unable to take sick leave unless a doctor advised rest.<sup>294</sup>

A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium confirmed that a doctor’s note is required to take sick leave by his employer as well.<sup>295</sup>

291 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

292 An Indian worker employed as an electrician by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

293 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

294 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

295 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

## Protecting workers’ occupational health and safety—good practices from FIFA World Cup Qatar 2022 stadium construction sites

### Regular breaks during the work day

A Nepalese worker employed as a scaffolder by Joannou & Paraskevaides Qatar WLL on Education City Stadium described being allowed to take regular breaks to drink water and use the washroom—a critical practice for maintaining hydration on construction sites:

*There are no dictated breaks for drinking water or using the bathroom. We can go anytime.<sup>296</sup>*

A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium also described a company practice of allowing workers to take regular breaks to drink water and use the bathroom throughout the day.<sup>297</sup>

### Access to health services

A Bangladeshi worker employed as an office administrator, working for the Salini Impregilo Group on Al Bayt Stadium, described high road employment practices with regard to health care—including company provided health insurance and on-site medical clinics:

*The employer gives us healthcare, and they also have their own ambulances and clinic.<sup>298</sup>*

Access to employer provided healthcare was consistently reported by workers employed by Salini Impregilo Group on Al Bayt Stadium.<sup>299</sup>

A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium<sup>300</sup> and a Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium described similarly high standards of care when they fell ill.<sup>301</sup>

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described good company facilities for treating COVID-19.<sup>302</sup>

### Paid sick leave

An Indian worker employed by IMAR Trading & Contracting Co WLL, erecting safety barricades at Al Bayt and Lusail Stadiums described receiving paid sick leave when he contracted COVID-19:

*I was on paid leave when I had COVID-19. All workers got paid leave if they had COVID-19 in addition to the sick leave given under the contract.<sup>303</sup>*

296 A Nepalese worker employed as a scaffolder by Joannou & Paraskevaides Qatar WLL on Education City Stadium, interviewed in Qatar, April 2022.

297 A Nepalese worker employed as an electrician by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

298 A Bangladeshi worker employed as an office administrator, working for the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021.

299 A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021; A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021; A Bangladeshi worker employed as a cleaner by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, March 2022; A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

300 A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium, interviewed in Qatar, April 2022.

301 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.

302 Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

303 An Indian worker employed by IMAR Trading & Contracting Co WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, May 2022.

## Worksite precautions

An Indian worker employed by IMAR Trading & Contracting Co WLL, erecting safety barricades at Al Bayt and Lusail Stadiums described COVID-19 worksite precautions:

***The company took proper safety measures to prevent the spread of infection. We used face mask, gloves, and sanitizers. We also maintained social distancing at the work place. Our temperature was checked every day before entering to duty. We used the Ehteraz application in order to update our COVID-19 status. The hygienic measures were strict at the work place to prevent the spread of infection. The company wanted to avoid infection because if a large number of workers were infected, it would affect the work flow.***<sup>304</sup>

An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadiums confirmed that these precautions were taken by IMAR Trading & Contracting Co WLL across sites.<sup>305</sup> An Indian gardener employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums; and an Indian gardener employed by IMAR Trading & Contracting Co WLL on Lusail Stadium both confirmed these worksite safety practices.<sup>306</sup> An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL—as a fire and safety officer on Lusail Stadium also reported adequate on site safety measures.<sup>307</sup>

A Nepalese worker employed as a mason by Al Jaber Engineering WLL on Al Thumama Stadium described occupational health and safety precautions taken by the company during COVID-19:

***We wore masks. It was compulsory. We were not allowed inside the site without mask. At the entrance they used to check our temperature. Anyone with high body temperature was not allowed in. Sanitizer was placed in different places in the site as well as accommodation camp. Toolbox meetings were done in groups, rather than with everyone in the same place. Despite these precautions, twenty-five to thirty people from our company were infected.***<sup>229</sup>

An Indian scaffolder employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums also reported good practices for maintaining workplace safety during COVID-19:

***The company wanted to avoid infection because if a large number of workers were infected, it would affect the work flow. The company took proper safety measures to prevent the spread of infection. They reduced the number of workers in a room from six to two. We used face masks, gloves, and sanitizers. We maintained social distancing at the work place. Our temperature was checked before entering duty. We used the Ehteraz application in order to update the Covid status. There were restrictions from going outside from the accommodation space. It was mandatory to take Covid vaccinations, so I have completed my vaccination schedule including the booster dose. All workers in my company got vaccinations. When cases were suspected, workers were given RTPCR tests as per the protocol.***<sup>308</sup>

304 An Indian worker employed by IMAR Trading & Contracting Co WLL on Al Bayt and Lusail Stadiums, interviewed in Qatar, May 2022.

305 An Indian worker employed as a mason by IMAR Trading & Contracting Co WLL on Al Janoub, Al Thumama, and Lusail Stadium, interviewed in Qatar, June 2022.

306 An Indian gardener employed by IMAR Trading & Contracting Co WLL on Lusail Stadium, interviewed in Qatar, June 2022; An Indian gardener employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums, interviewed in Qatar, June 2022.

307 An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL, interviewed in Qatar, May 2022.

308 An Indian scaffolder employed by Land Worx Constructions—a subcontractor of IMAR Trading & Contracting Co WLL—on Lusail and Al Thumama Stadiums, interviewed in Qatar, May 2022.

A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium described good practices at his worksite:

***My work site is nice. It had all the facilities and services like applied safety rules, making social distancing and also medical facilities if needed. It was also good from security perspective.***<sup>309</sup>

## Safer accommodations

### Good practices from Al Bayt Stadium

A Bangladeshi worker employed by Salini Impregilo Group on Al Bayt Stadium described his living conditions:

***Four of us share a room. We were given masks and sanitizers. The company had the goods we needed delivered from the market during the pandemic.***<sup>310</sup>

A Nepalese worker employed by Salini Impregilo on the same site also reported living conditions that facilitated COVID-19 precautions:

***There were 4 of us in one room. The room is quite big and there were 4 beds and 4 lockers too. There was a nurse in camp, when we came from outside and go for a work, so she tasted us. Company had managed everything which workers needed in pandemic.***<sup>311</sup>

Other workers also reported receiving decent housing from Salini Impregilo Group.<sup>312</sup>

### Good practices from Al Janoub Stadium

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium described comfortable accommodation and COVID-19 precautions:

***There are 4 people in a room. The room is spacious. There is a wardrobe and chairs in the room. The company provides mask and sanitizers both on work site and accommodation.***<sup>313</sup>

### Good practices form Al Rayyan Stadium

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium described company measures to reduce the spread of COVID-19 in worker accommodations:

***In order to take COVID-19 measures, the company reduced the number of staff members in each room from four to two people.***<sup>314</sup>

### Good practices from Education City Stadium

A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL (J&P)—on Education City Stadium, described accommodations that facilitated social distancing:

***There were only 2 people in a large room. We had toilet, bathroom, and staff mess hall. They were not that crowded which made it easier to maintain social distancing.***<sup>315</sup>

309 A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, April 2022.

310 A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021.

311 A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, April 2022.

312 A Bangladeshi worker employed by the Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, November 2021; A Bangladeshi worker employed as a cleaner by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, March 2022.

313 Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

314 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

315 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevaides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

### Good practices from Al Thumama Stadium

A Nepalese worker employed as a mason by Al Jaber Engineering WLL on Al Thumama Stadium described good practices at his accommodation during COVID-19:

***There are 4 people in a room. The room is spacious. We have a cupboard to keep our clothes. Bathroom and toilets are regularly cleaned. During COVID-19, we used to maintain social distancing while we went to the mess hall. There were sanitizers placed in different areas of the camp.***

A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium confirmed these living conditions.<sup>316</sup>

- A Special menu was introduced for our work force which was rich in Vitamin C and other immune boosting vegetables etc as a precaution.
- Our Counselling program for pre and post Covid actions has helped people to come out from the post covid issues very fast.
- We also would like to point out that by the grace of God and the precautions taken by us there has been no Casualties on account of Covid-19.
- These highroad practices should be widely adopted as an industry standard. The risks posed to workers even with such company initiatives, however, attest to the extreme risks associated with proceeding with construction work during COVID-19—a common practice across FIFA World Cup Qatar 2022 stadiums that were newly constructed in the lead up to the World Cup.<sup>317</sup>

### Good practices from Galfar Al Misnad

Workers employed by Galfar Al Misnad described high road practices in protecting occupational health and safety by the company on worksites and accommodations. A Nepalese worker employed by Galfar Al Misnad as an assistant storekeeper on Al Bayt Stadium described his living conditions as conducive to taking COVID-19 precautions:

***There are four people in a room. The room is spacious. There is a wardrobe and chairs in the room. The company provides mask and sanitizers both on work site and accommodation.***<sup>318</sup>

Despite these practices, however, the same worker reported feeling at risk of contracting COVID-19 not only on site but also in transit:

***There is a risk of contracting COVID-19 on site, in the accommodation camp we all share the mess hall, and we share the bus to bring us to the site.***<sup>319</sup>

This worker did in fact contract COVID-19. He described his experience once infected, including high levels of care from Galfar Al Misnad:

***I was infected. I was asymptomatic so I stayed in quarantine. There was a separate building for COVID patients. A nurse was stationed in the building. If anyone got any symptoms related to COVID, they could call the camp boss. The camp boss notified to the call center. The person was immediately taken to be tested. There were several people who got infected. I think around 25 The company took good care of us. They sent us food in the room. For workers whose health got severe, were immediately taken to hospital.***<sup>320</sup>

316 A Nepalese worker employed as a construction helper by Al Jaber Engineering and Construction on Al Thumama Stadium, interviewed in Qatar, April 2022.

317 FW: Violations of Migrant Workers' Labour and Human Rights at Galfar Al Misnad- Draft Response," via email, October 25, 2022. Full response available in the Annex of this report.

318 A Nepalese worker employed by Galfar Al Misnad as an assistant storekeeper on Al Bayt Stadium, interviewed in Qatar, July 2022.

319 A Nepalese worker employed by Galfar Al Misnad as an assistant storekeeper on Al Bayt Stadium, interviewed in Qatar, July 2022.

320 A Nepalese worker employed by Galfar Al Misnad as an assistant storekeeper on Al Bayt Stadium, interviewed in Qatar, July 2022.

Equidem wrote to Galfar Al Misnad with the findings of our report, and received in response a comprehensive list of workplace safety policies implemented by the company.

1. *Right from the beginning of the pandemic Galfar Al Misnad has strictly maintained COVID protocols at all sites, accommodations, and offices as per the guidelines laid out by Qatar’s Ministry of Public Health.*
2. *Galfar Al Misnad also created an internal COVID Task Force with concise action plans to tackle various contingencies that could arise due to the pandemic. The Task Force was able to identify and isolate cases rapidly, as well as provide the necessary timely response to move affected employees to the health Centers and to prevent further spread.*
3. *Isolation facilities were created across the company’s assets to enable the safe isolation of COVID positive employees who did not require hospital care. When advised by the health officials, those in close contact were also quarantined until tested and confirmed to be negative.*
4. *Our response framework went beyond isolation and quarantine protocols, to include counselling for the patient as well as their families, many of whom were far away in the home country.*

5. *In support of the country’s vaccination drive, we encouraged and mobilized employees to get the COVID 19 vaccinations at the earliest, and subsequently the boosters as well. Transportation to and from the work site was conducted strictly by MoPH guidelines, often times with capacities as low as 30% capacity of the vehicle. Masks were mandatory on all buses as per MoPH guidelines. The vehicles were equipped with sanitizers and also had posters communicating sanitation and hygiene protocols in various languages for the ease of understanding. Such posters were also displayed at all camps, sites and offices.*
6. *To empower our employees, we also conducted awareness sessions and toolbox meetings to educate employees on hygiene and safety protocols.*

*Our commitment to the Health and Safety of our employees has been recognized and acknowledged by international safety organizations. We are nine-time recipients of British Safety Council’s (BSC) International Safety Awards, and we won our seventh consecutive award in 2022. Our Al Wajba Project won BSC’s Best in Country Award in 2021. Galfar Al Misnad also won Royal Society of Prevention of Accidents (ROSPA) Health and Safety Gold Award in 2022 and the Silver Award in 2021. We were also recently acknowledged by Qatar’s Ministry of Labour for our staunch commitment to health and safety at the workplace.*

## Creating a Captive Workforce - Inability to change jobs or obtain No Objection Certificates (NOCs)

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium described being prevented by his employer from changing jobs:

*Last year, I tried to change my company and move to another company where I would earn a higher*

*salary and get more benefits. It is my right to change employers and this has been announced by MOI Qatar (Ministry of Interior) and ADLSA (Administrative Development Labour and Social Affairs). When I applied for an NOC to our company owner, the owner blocked my name using my QID (Qatar Identification). Even though I got*

***two approval messages from MOI and ADLSA. They refused to give me a promotion and they won't let me leave.***<sup>321</sup>

A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium explained that workers in this company are not given NOC's [No Objection Certificates] to shift employers:

***Our company will never give us an NOC. We have many opportunities to get jobs with good salaries, but they will not give us an NOC even after we have finished our contract period.***<sup>322</sup>

A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium also described inability to transfer to another company:

***If someone wants to change from this company, the company will not give an NOC for transfer. It is a rights violation.***<sup>323</sup>

A Bangladeshi worker employed as rigger by Midmac Contracting Co. WLL on Al Janoub Stadium also described company practices of refusing to provide NOCs:

***Our company never helps us to get an NOC. Even if we have skills in other sectors and fields and good opportunities with other companies, the company will not support us to take those opportunities.***<sup>324</sup>

An Indian worker employed by Al Jaber Trading & Contracting Co.—a subcontractor of IMAR Trading & Contracting Co WLL—as a fire and safety officer also described a company policy of preventing workers from switching employers:

***It is difficult to get an NOC from the company. If anyone tries to leave the company in a way the company does not like, they will take a ban against the worker.***

A Bangladeshi worker employed to work as a head designer on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifah International Stadiums described the challenges he faced in leaving his employer and his inability to seek relief through the labour courts:

***I have not been paid the salary I am due and the company has barred me from applying for jobs elsewhere. I filed a case in the Labor Court against the company for not giving an NOC and that case is currently pending in the High Court. This is the worst kind of discrimination I have faced. The long and complicated case has caused me severe financial and emotional distress. In the end, I am forced to return to Bangladesh without service benefits.***<sup>325</sup>

A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium also reported a company practice of refusing to support workers in changing employers:

***The company does not give NOCs.***<sup>326</sup>

A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevides Qatar WLL (J&P)—on Education City Stadium, described barriers to changing employers:

***Our company does not provide workers with NOCs. They also do not allow workers who have been fired or terminated to seek jobs elsewhere.***<sup>327</sup>

321 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Lusail Stadium, interviewed in Qatar, April 2022.

322 A Bangladeshi worker employed as a security guard by Al Sraiya Security Services (SSS) on Al Janoub Stadium, interviewed in Qatar, April 2022.

323 A Bangladeshi security guard employed by Al Sraiya Security Services WLL on Al Rayyan Stadium, interviewed in Qatar, May 2022.

324 A Bangladeshi worker employed as a rigger by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, April 2022.

325 A Bangladeshi worker employed as a head designer to work on digital prints for stadium interiors by Salini Impregilo Group on Al Bayt and Khalifa Stadiums, interviewed in Qatar, November 2021.

326 A Nepalese worker employed as a scaffolder by Al Jaber Engineering WLL on Al Thumama Stadium, interviewed in Qatar, April 2022.

327 A Nepalese worker employed by Pigeon Engineering Projects, Trading & General Services—a subcontractor of Joannou & Paraskevides Qatar WLL—on Education City Stadium, interviewed in Qatar, April 2022.

A Nepalese worker employed by HBK on Lusail Stadium described the challenges he faced in changing jobs:

***I tried to change my job in February 2021. It had been 23 months since I started working at HBK. I knew that I could change employers after completing 24 months with the company. I used to follow a site called ‘Nepal Qatar khabar’, which gave updates on any changes in law and policies in Qatar. This is how I knew that I could change my jobs. I also knew that even if the employer does not agree to let me change my job, I could complain to the government.***

***I applied at a company called ‘Next Home Qatar’. I wanted to work there because they were offering better pay than HBK.***

***I talked about the process of changing my job with a timekeeper at HBK. He was an Indian national. His name was Kaseem. He made a phone call to a higher authority at HBK. They responded positively saying I could change jobs. Then I started my process, and it was almost final that I would move to work at Next Home.***

***In March 2021, someone from the HR Department came to me and said that I could not change my jobs. He threatened that they will not renew my ID and make me illegal. He was a Pakistani national and spoke Hindi. After that I signed a paper to renew the ID. Up to 4 months, they did not renew my ID. Before that, for two years, my ID was always renewed on time.<sup>328</sup>***

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium also described inability to change employers:

***The company does not allow us to change employers. They do not want to hear a single word about NOCs. They directly say that we will not get NOCs. We are threatened saying that if we leave, they will fabricate a case against us<sup>329</sup>.***

***An Indian construction worker employed by HBK on Lusail Stadium reported challenges in getting a no objection certificate (NOC).***

***The company did not allow us to seek alternative employment. Workers wanted to quit their jobs and work independently in Qatar, but they were not given no objection certificates. If we wanted to leave the job, our choice was to return home.<sup>330</sup>***

A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium also reported challenges in obtaining NOCs:

***The company doesn’t provide an NOC. If the company terminates or fires workers, they have to return home.<sup>331</sup>***

A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium described inability to obtain a No Objection Certificate (NOC) from the company:

***The company never provides workers with an NOC.<sup>332</sup>***

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 construction sites 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.

328 A Nepalese worker employed by Hamad Bin Khalid Engineering Company WLL (HBK) on Lusail Stadium, interviewed in Qatar, July 2022.

329 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, August 2022.

330 An Indian construction worker employed by HBK Contracting Company on Lusail Stadium, interviewed in Qatar, August 2022.

331 A Nepalese worker employed as a scaffolder by HBK on Lusail Stadium, interviewed in Qatar, July 2022.

332 A Bangladeshi worker employed as an engineer by Gulf Contracting Company WLL on Al Rayyan Stadium, interviewed in Qatar, April 2022.

**Good practices – Supporting worker transitions to new roles**

A Bengali worker employed by the Salini Impregilo Group to work on Al Bayt Stadium described good practices by the company to support workers in transitioning to new roles during and in the aftermath of the COVID-19 pandemic:

*Within the company, when due to COVID-19 some sectoral work was temporarily closed, surplus workers were deployed in different sectors where they were needed. The company provided workers with notice that they would no longer be required and if they found new jobs, they provided them with no objection certificates [NOCs].<sup>333</sup>*

A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium confirmed these practices.<sup>334</sup>

A Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium also described company support in transitioning between roles:

*We can easily get NOCs from the company. If the company terminates the worker, he can go to other company for work by getting an NOC from this company.<sup>335</sup>*

A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium reported similar practices of providing workers with NOCs if they want to switch roles.<sup>336</sup>

333 A Bengali worker employed by the Salini Impregilo Group to work on Al Bayt Stadium, interviewed in Qatar, January 2022.

334 A Nepalese worker employed as a plumber by Salini Impregilo Group on Al Bayt Stadium, interviewed in Qatar, April 2022.

335 Nepalese worker employed as a mason’s helper by Midmac Contracting Co. WLL on Al Janoub Stadium, interviewed in Qatar, May 2022.

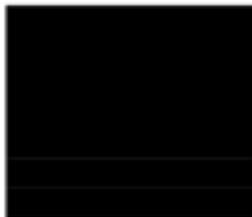
336 A Nepalese worker employed as a painter by Larsen & Toubro on Al Rayyan Stadium, interviewed in Qatar, April 2022.



## Annex – company responses



Date: 31 October 2022  
Ref. No. SC-WWD-PRW-LET-EQD-22-00138



**Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites**

We refer to your letter dated 21 October 2022, seeking feedback from the Supreme Committee for Delivery & Legacy (SC) on research and investigations conducted by Equidem into working conditions for migrant construction workers employed on FIFA World Cup 2022 stadiums in Qatar between September 2020 and October 2022.

### Timing

Despite your investigation taking place over the last two years, your letter dated 21 October was your first contact with the SC, the organization responsible for delivery of the required national infrastructure, planning and operations for the FIFA World Cup Qatar 2022. Moreover, to the best of our knowledge, no contact has been made with any other governmental organization of Qatar about the matters that you have raised. Only now, at this late stage, with what appears to be a final report, have you sought to contact us about matters which could have been properly and contemporaneously investigated.

This belies the apparent motive for your report: to publish a highly critical document at a time where FIFA World Cup Qatar 2022 work is almost coming to a close, where the allegations contained in the report can no longer be properly investigated and acted upon, very shortly before the start of the event itself. That timing is quite clearly not coincidental.

### Workers' Welfare Programme

As you are well aware, since construction began on FIFA World Cup Qatar 2022 infrastructure in 2014, the SC's commitment to ensuring the health, safety and dignity of all workers employed on our projects has remained steadfast.





You are also aware that SC workers are protected by the SC's Workers' Welfare Standards (WWS) which have ensured decent working and living conditions for workers. The WWS 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 embedded in our tendering process, including pre-mobilization process for sub-contractors, and are contractually binding.

◆ Our due diligence begins at the tendering stage, and since 2016, 25% of contractors have failed pre-tender inspections, ensuring that substandard contractors are eliminated at the earliest possible stage of the process. All approved contractors, upon deployment, are also subjected to on-going due diligence through a robust four-tier audit system. This involves self-audits by contractors and quarterly audits by the SC's Workers' Welfare & Labour Rights Department (WWD), followed by independent audits by an external monitor, appointed by the SC. Additionally, contractors are also subjected to unannounced inspections by the SC as well as inspections by the Ministry of Labour (MoL).

◆ The SC has covered over 85,000 hours of audits and inspections across construction sites to monitor compliance with the WWS and where non-compliances are identified, we work closely with the contractor to ensure immediate rectification. If major or persistent non-compliances continue to be reported, we utilise enforcement measures that has resulted in 453 contractor violations being reported to MoL, with 50 contractors blocked by MoL from being deployed; demobilization of 73 contractors from SC projects; as well as the placement of 273 contractors on a watch list and blacklisting of 7 contractors.

In addition to our due diligence, we have also focused on empowering workers to share concerns or feedback on any welfare matters. The SC established a three-tier grievance mechanism early on to support workers' voices and provide them a safe platform to share grievances. These include the Workers' Welfare Forums (WWF) that allow workers to share their concerns with elected representatives (note: representatives are required to be elected where a contractor has more than 100 workers), without any fear of retaliation. We also introduced a dedicated anonymous workers' grievance hotline for workers to report issues directly to the Workers' Welfare team. To date, 1,207 cases have been lodged of which 96% have been resolved.

Charging recruitment fees is illegal by international law and Qatar Labour Law and prohibited by the WWS. In order to tackle this challenge, the SC introduced the recruitment fees reimbursement programme as a remedy for workers who were charged illegal recruitment fees in their home countries, shifting the burden of proof from worker to employer. 266 contractors have voluntarily signed up to the





programme and have so far reimbursed QAR 84.7M to 49,286 SC and non-SC workers.

Workers’ health and safety also continues to be a top priority for the SC. We have introduced a range of measures such as nutrition programme, comprehensive medical screenings, electronic medical records system, training and upskilling, mental health and cardiac pathways that have revolutionized healthcare for workers on our programme. We have also addressed heat stress by establishing robust mitigation measures early on across all our sites, which includes deployment of revolutionary cooling suits to protect workers against heat stress during summer. Our health and safety standards are on par with, if not better than, many construction projects in Europe and North America – a fact the global trade union Building and Wood Workers’ International (BWI) recognizes and have publicly attested to.

Workers’ safety remained a top priority throughout the [COVID-19 pandemic](#). All workers received free masks, sanitizers and health checks. Our comprehensive medical screenings and electronic medical records system enabled us to identify high-risk workers and provide them tailored treatment plans for their healthcare management. All these workers continued to receive their salaries along with free food and accommodation. The SC carried out several periodic inspections to ensure that Qatar’s Ministry of Public Health (MOPH) guidelines with respect to COVID (i.e. masks, social distancing, testing etc.) are being adhered on the sites. We also ensured that WWF continued online to raise awareness on COVID-19 regulations and also introduced a mental health awareness campaign to support workers. Over 810 WWF were conducted online during the pandemic.

#### The Equidem Report

While we appreciate the time, energy and resources committed to investigating the working conditions of migrant workers on FIFA projects, it is of great concern to the SC that the report is rife with serious inaccuracies. These inaccuracies undermine the status of the report as a whole and raise questions about the veracity of your sources. For example, Salini Impregilo Group has never worked on the Khalifa International Stadium. During the Covid-19 pandemic, there was no country-wide lockdown and contractors were taking additional measures in line with MOPH requirements to protect workers. This fact would have been available to Equidem from a review of publicly available material.

Further, it also appears that some of the alleged violations have been repeated more than once across the report or use the same workers’ example more than once.





With regard to specific findings you have outlined, we would like to highlight the following, which we would expect to be included alongside the relevant allegation in any published document.

1. The SC has ensured that all workers on the SC programme were paid their salaries in full during the COVID-19 pandemic.
2. All work-related fatalities on the SC programme have been reported in our [annual reports](#). We encourage you to refer to our annual reports for details.
3. The SC has a tested and effective grievance mechanism which all workers on our programme have access to and are encouraged to use. We recommend that you encourage any workers facing challenges to reach out to the SC via the WWF or the Grievance hotline for remediation of issues. In fact our WWF model has been used by the MoL for the development and roll out of Joint Committees across the country.
4. Your findings also outline issues related to NOCs. However, based on official statistics released by the UN's International Labour Organization, a total of 242,870 workers in Qatar were able to switch jobs between October 2020 and 2021 following the introduction of historic labour reform.

Furthermore, your findings do not provide any insight into the methodology of the study, or the number of workers who may be facing challenges, or even the number of workers interviewed and how many are blue collar versus white collar. This context is critical to lending any credibility to the findings and presenting a genuine authentic picture of the situation on the ground.

#### Conclusion

We understand there is always room for improvement. We are the first to recognize this and our systems have at times been exploited by bad faith contractors, and when these instances are found through our thorough due diligence mechanisms, appropriate remedial and punitive actions are taken.

Your report presents a completely unbalanced picture of the significant progress versus the inevitable challenges that remain. It is unfortunate that workers who may have reached out to your organisation with issues, may still - unbeknownst to us - be facing challenges two years later as a result of you only sharing information with us now at this very belated stage. We have always been transparent about our challenges and progress throughout our journey, and maintain an open dialogue with all our stakeholders.





While we are supportive of the sharing of information which can help improve the work that we undertake in Qatar, the SC will not stand for the publication of false and unsubstantiated allegations, or the publication of a one-sided narrative seemingly calculated to damage the organisation's reputation prior to the FIFA World Cup 2022.

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

Our legal rights are fully reserved.

Supreme Committee for Delivery & Legacy



Monday, October 31, 2022 at 15:46:27 Nepal Time

**Subject:** FW: Violations of Migrant Workers' Labour and Human Rights at Advanced Construction Technology Services  
**Date:** Monday, October 24, 2022 at 18:01:09 Nepal Time  
**From:** Mustafa Qadri  
**To:** Deepika Thapaliya, Jason Nemerovski  
**CC:** Shikha Bhattacharjee  
**Attachments:** Equidem Letter to Advanced Construction Technology Services 241022.pdf

Hi team

I just got a call from Majdi a manager from this company. Here are details of what he said please update the register and I'll add his response to the report:

Majdi from Advanced Construction Technology Services called at 24 October 2022  
"What is mentioned in this report is totally incorrect. The SC is coming to monitor every month and all of our reports are clear." Invited us to speak to them in their Qatar office and said that if we publish their name they will bring legal action.  
[REDACTED] number from Lebanon.

Best,  
Mustafa.

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**From:** Equidem [REDACTED]  
**Sent:** 24 October 2022 07:46  
**To:** infoqatar [REDACTED]  
**Cc:** Mustafa Qadri [REDACTED]; Rameshwar Nepal [REDACTED]  
Namrata Raju [REDACTED]; Equidem [REDACTED]  
**Subject:** Violations of Migrant Workers' Labour and Human Rights at Advanced Construction Technology Services

Dear Mr. Khaled Awad,

I am writing to you on behalf of Equidem, a human rights and labour rights charity that monitors labour rights globally, including in the Arab Gulf countries. Between September 2020 and October 2022, Equidem conducted an investigation into working conditions for migrant workers employed on FIFA World Cup 2022 stadiums in Qatar. During our research, we came across workers employed by your company that we believe are being subjected to labour exploitation. We wish to share our findings with you and seek further information about the cases we have documented and rights protections for migrant workers in your company. Where relevant and appropriate, Equidem would like to publish information provided by the company in a public report to be published later this month.

We would appreciate receiving any information you are willing to provide by Monday, October 31<sup>st</sup> so that we can incorporate your responses in the report. We would also be happy to discuss our findings and your responses and may be contacted on [REDACTED]

Best,  
Deepika Thapaliya  
Research Project Manager  
Equidem

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Monday, October 31, 2022 at 15:32:01 Nepal Time

**Subject:** RE: M/s Equidem mail dated 24th October 2022  
**Date:** Sunday, October 30, 2022 at 17:27:51 Nepal Time  
**From:** Saic Landscape  
**To:** Equidem  
**CC:** Rameshwar Nepal, Mustafa Qadri, Namrata Raju  
**Attachments:** image005.png, image006.png, image007.png, image008.png, image009.png, image010.png, image011.png, image012.png, image013.png, image014.jpg, image015.jpg, image016.jpg, image017.jpg

Dear Sir,

We kindly acknowledge receipt of your mail dated 24<sup>th</sup> October 2022 and please find below SAIC response related.

**1. Exposure to COVID-19**

A Bangladeshi worker who maintains turf grass at Al Janoub Stadium—employed by the contractor, Al Sulaiteen Agricultural and Industrial Complex (SAIC)—described reporting to work during the pandemic lockdowns despite exposure to COVID-19.

*The Qatar government enforced a lockdown all over the country during the pandemic, beginning in May 2020. At that time, our company sent us to work. We were told that this is a FIFA World Cup 2022 project and we have to finish the work as soon as possible. During the pandemic it was hard to work at Al Janoub stadium. Some companies followed the lockdown rules, but not SAIC. They sent us to the site for daily work. It was really scary for all of us doing our duty during the pandemic, but we were helpless. We have a total of 30 workers for gardening, and five to seven of us fell sick.*

SAIC Response
A. SAIC accommodation was not located on the government lockdown area.
B. SAIC during lockdown period and even through covid pandemic periods and until now has abide and fully implemented all Qatar government and Supreme Committee welfare regulation and standards. During all covid phases whether in the workers accommodation, during limitation of workers buses transportation capacities, workers welfare was implemented. Meantime, official working duties regulations was fully respected by SAIC and implemented including restricted working days and numbers of workers allowed to go to work. All this was done under strict supervision and surveillance of all related official authorities and Supreme Committee for Legacy, (SC).

**2. Health risks at labour camp**

A Bangladeshi worker employed as a gardener at Al Janoub Stadium, hired by Al Sulaiteen Agricultural and Industrial Complex (SAIC), described living in crowded living conditions:

*Living conditions were not good during the pandemic, and even now. We live with eight people in each small room. There was no social distancing possible,*

*even though the company did provide masks and sanitizers.*

<u>SAIC Response</u>
<p>A. <i>During the pandemic period and up to now workers welfare and living conditions are always according to welfare regulations and standards including but not limited to 4 workers/ room, random covid test done on SAIC expenses, isolation rooms created for infected workers, permanent nurse present at accommodation.</i></p> <p>B. <i>Social distancing was implemented.</i></p> <p>C. <i>Signage in all languages was installed at workers accommodation showing precaution and prevention measures to be respected.</i></p> <p>D. <i>Company provided sanitation, masks and local company was hired to spray the accommodation facilities.</i></p>

**3. Lack of health insurance**

A Bangladeshi worker employed as a gardener at Al Janoub Stadium, hired by Al Sulaiteen Agricultural and Industrial Complex (SAIC), reported that he was not provided with health insurance even though he worked daily during the pandemic:

*We have a health card for a medical check-up, but we do not have health insurance.*

<u>SAIC Response</u>
<p>A. <i>According to Qatar labour law, SAIC provided health cards to all its workers which allow them to get all kind of treatments, medication and surgery if needed free of charge in the government health centres, clinics and hospitals.</i></p> <p>B. <i>All SAIC workers are covered within worker’s compensation policy schedule which protects workers from any accident or personal injury or body injuries.</i></p> <p>C. <i>Official workers health insurance scheme is under study by the official authorities.</i></p>

**4. Recruitment fees**

Workers employed in turf maintenance through contractor, Al Sulaiteen Agricultural and Industrial Complex (SAIC), reported being charged recruitment fees of 10,000 BDT (USD 99).

**SAIC Response**

- A. SAIC recruit its workers only through overseas manpower agencies approved by the Ministry of Labour (MOL).
- B. SAIC proceed on recruitment online through overseas Qatar visa centre (QVC) and settle all QVC payment online (visa fees, medical check, etc...).

SAIC has always abided and committed to the implementation of all worker’s welfare standards, regulations enforced by Ministry of Labour (MOL) and Supreme Committee for Legacy, (SC) related to SAIC workers employed at FIFA World Cup 2022 stadiums in Qatar and all its other projects.

In addition to above, all SAIC workers are receiving their salaries through the official worker’s protection system (WPS), which allows workers to withdraw their monthly salaries from any ATM in Qatar.

Although we understand your concerns, we disapproved all the allegations mentioned in M/s Equidem findings report and reconfirm our continuous commitment and implementation of Worker’s Welfare as per (MOL) and (SC) standards and regulations.

We would like to underline also that all SAIC landscaping and turf projects and services are related to government departments and authorities and therefore SAIC is under their permanent supervision workwise and welfare-wise.

Please do not hesitate to contact us for any matter related to our worker’s welfare.

Best Regards,

Jahangir Kabir  
Workers’ Welfare Officer



[Redacted signature area]



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**From:** Equidem [REDACTED]  
**Sent:** Monday, October 24, 2022 9:56 AM  
**To:** Saic Landscape [REDACTED]  
**Cc:** Rameshwar Nepal [REDACTED]; Mustafa Qadri [REDACTED];  
Namrata Raju [REDACTED]  
**Subject:** Violations of Migrant Workers' Labour and Human Rights at Al Sulaiteen Agricultural and Industrial Complex (SAIC)

Dear Mr. Abdullah Salem Sulaiteen,

I am writing to you on behalf of Equidem, a human rights and labour rights charity that monitors labour rights globally, including in the Arab Gulf countries. Between September 2020 and October 2022, Equidem conducted an investigation into working conditions for migrant workers employed on FIFA World Cup 2022 stadiums in Qatar. During our research, we came across workers employed by your company that we believe are being subjected to labour exploitation. We wish to share our findings with you and seek further information about the cases we have documented and rights protections for migrant workers in your company. Where relevant and appropriate, Equidem would like to publish information provided by the company in a public report to be published later this month.

We would appreciate receiving any information you are willing to provide by Monday, October 31<sup>st</sup> so that we can incorporate your responses in the report. We would also be happy to discuss our findings and your responses and may be contacted on [REDACTED]

Best,  
Deepika Thapaliya  
Research Project Manager  
Equidem

Monday, October 31, 2022 at 15:34:13 Nepal Time

**Subject:** FW: Violations of Migrant Workers’ Labour and Human Rights at Galfar Al Misnad - Draft Response.  
**Date:** Tuesday, October 25, 2022 at 15:05:20 Nepal Time  
**From:** Joy G. Pettah  
**To:** Mustafa Qadri  
**CC:** Namrata Raju, Rameshwar Nepal, Equidem  
**Attachments:** image001.jpg, image002.jpg, image003.png, Equidem Letter to Galfar Al Misnad - 221022.pdf

Dear Mr. Qadri,

Please find our response to your letter dated 24<sup>th</sup> October 2022.

We would first like to thank you for giving us a chance to respond to the allegations made against Galfar Al Misnad regarding the subject matter. We officially refute these false claims regarding the company’s COVID management and its purported repercussions on labour and human rights of employees. We take safety very seriously at Galfar Al Misnad and were dismayed to hear of such an accusation. Our response is given in detail below:

1. Right from the beginning of the pandemic Galfar Al Misnad has strictly maintained COVID protocols at all sites, accommodations, and offices as per the guidelines laid out by Qatar’s Ministry of Public Health.
2. Galfar Al Misnad also created an internal COVID Task Force with concise action plans to tackle various contingencies that could arise due to the pandemic. The Task Force was able to identify and isolate cases rapidly, as well as provide the necessary timely response to move affected employees to the health Centers and to prevent further spread.
3. Isolation facilities were created across the company’s assets to enable the safe isolation of COVID positive employees who did not require hospital care. When advised by the health officials, those in close contact were also quarantined until tested and confirmed to be negative.
4. Our response framework went beyond isolation and quarantine protocols, to include counselling for the patient as well as their families, many of whom were far away in the home country.
5. In support of the country’s vaccination drive, we encouraged and mobilized employees to get the COVID 19 vaccinations at the earliest, and subsequently the boosters as well.
6. Transportation to and from the work site was conducted strictly by MoPH guidelines, oftentimes with capacities as low as 30% capacity of the vehicle. Masks were mandatory on all buses as per MoPH guidelines. The vehicles were equipped with sanitizers and also had posters communicating sanitation and hygiene protocols in various languages for the ease of understanding. Such posters were also displayed at all camps, sites and offices
7. To empower our employees, we also conducted awareness sessions and toolbox meetings to educate employees on hygiene and safety protocols.
8. Our commitment to the Health and Safety of our employees has been recognized and acknowledged by international safety organizations. We are nine-time recipients of British Safety Council’s (BSC) International Safety Awards, and we won our seventh consecutive award in 2022. Our Al Wajba Project won BSC’s Best in Country Award in 2021. Galfar Al Misnad also won Royal Society of Prevention of Accidents (ROSPA) Health and Safety Gold Award in 2022 and the Silver Award in 2021. We were also recently acknowledged by Qatar’s Ministry of Labour for our staunch commitment to health and safety at the workplace.
9. A Special menu was introduced for our work force which was rich in Vitamin C and other immune boosting vegetables etc as a precaution.
10. Our Counselling program for pre and post Covid actions has helped people to come out from the post covid issues very fast.
11. We also would like to point out that by the grace of God and the precautions taken by us

there has been no Casualties on account of Covid-19.

We trust that our above response duly answers all your concerns. Please do let us know if you require any further information. We also request you to refrain from posting articles like this without proper verification and ascertaining ground realities.

**Best Regards**

**Joy G Pettah**  
Sr. General Manager  
Building & MEP - HOD (HR)



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**From:** info [redacted]  
**Sent:** 24 October, 2022 11:50 AM  
**To:** Joy G. Pettah [redacted]  
**Cc:** Aparna Paivalike Krishna [redacted]  
**Subject:** FW: Violations of Migrant Workers' Labour and Human Rights at Galfar Al Misnad

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**From:** Equidem [redacted]  
**Sent:** Monday, October 24, 2022 9:58 AM  
**To:** info [redacted]  
**Cc:** Rameshwar Nepal [redacted]; Mustafa Qadri [redacted];  
Namrata Raju [redacted]

**Subject:** Violations of Migrant Workers’ Labour and Human Rights at Galfar Al Misnad

Dear Mr. Satish G. Pillai,

I am writing to you on behalf of Equidem, a human rights and labour rights charity that monitors labour rights globally, including in the Arab Gulf countries. Between September 2020 and October 2022, Equidem conducted an investigation into working conditions for migrant workers employed on FIFA World Cup 2022 stadiums in Qatar. During our research, we came across workers employed by your company that we believe are being subjected to labour exploitation. We wish to share our findings with you and seek further information about the cases we have documented and rights protections for migrant workers in your company. Where relevant and appropriate, Equidem would like to publish information provided by the company in a public report to be published later this month.

We would appreciate receiving any information you are willing to provide by Monday, October 31<sup>st</sup> so that we can incorporate your responses in the report. We would also be happy to discuss our findings and your responses and may be contacted on [REDACTED]

Best,  
Deepika Thapaliya  
Research Project Manager  
Equidem

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Friday, November 4, 2022 at 14:15:44 Nepal Time

**Subject:** Re: Violations of Migrant Workers' Labour and Human Rights at Salini Impregilo  
**Date:** Monday, October 31, 2022 at 16:06:52 Nepal Time  
**From:** Salini Elizabeth  
**To:** Equidem  
**CC:** Rameshwar Nepal, Mustafa Qadri, Namrata Raju, Equidem, Montervino Ilaria, Castonguay Gilles René, Angori Emanuela

Dear Deepika Thapaliya,

Apologies for not having answered to your previous mail, but Mr Tomaiuolo left the group last august, and Mr Vianello has a different email address.

We have no doubt on the level of rights protection we offer to our workers, however we will read with extreme carefulness the report and - if necessary - carry out internal investigations to fully assess the matter.

We will be back to you in short.

Kind regards,

Elizabeth Salini

Inviato da [Outlook per iOS](#)

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**Da:** Equidem [REDACTED]  
**Inviato:** lunedì, ottobre 31, 2022 10:23 AM  
**A:** f.tomaiuolo [REDACTED]; Salini Elizabeth [REDACTED]; Media Webuild [REDACTED]  
**Cc:** Rameshwar Nepal [REDACTED]; Mustafa Qadri [REDACTED]; Namrata Raju [REDACTED]; Equidem [REDACTED]  
**Oggetto:** FW: Violations of Migrant Workers' Labour and Human Rights at Salini Impregilo

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Elizabeth Salini,

I am writing to you on behalf of Equidem, a human rights and labour rights charity that monitors labour rights globally, including in the Arab Gulf countries. Between September 2020 and October 2022, Equidem conducted an investigation into working conditions for migrant workers employed on FIFA World Cup 2022 stadiums in Qatar. During our research, we came across workers employed by your company that we believe are being subjected to labour exploitation. We wish to share our findings with you and seek further information about the cases we have documented and rights protections for migrant workers in your company. Where relevant and appropriate, Equidem would like to publish information provided by the company in a public report to be published soon.

We previously sent an email to [REDACTED] on Monday, October 24, but have not heard back. We would appreciate receiving any information you are willing to provide as soon as possible so that we can incorporate your responses in the report. We would also be happy to discuss our findings and your responses and may be contacted on [REDACTED]

Best,  
Deepika Thapaliya  
Research Project Manager  
Equidem

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Date: 08 November 2022  
Our ref. Q11017-0100D-EDM-CON-LTR-00001



Tel No.: [Redacted]

Email ID: [Redacted]

Attention: Mr. Mustafa Qadri – Chief Executive Officer, Equidem

Project: Al Bayt Stadium Al Khor City– (Stadium, Auxiliary Building & Bridge) Package 2, Part 1 & Part 2 (SP/C/1610/14) and Energy Centre- Package 4, Part 1 and Part 2 (SP/C/1612/14)

Subject: Violations of Migrant Workers' Labour and Human Rights at Salini Impregilo

Dear Sir,

We write in reference to your letter dated 24<sup>th</sup> October 2022 ("**Your Letter**"), which was addressed to Salini Impregilo S.p.A (renamed Webuild S.p.A), regarding the above subject.

Together, Galfar Al Misnad W.L.L, Salini Impregilo S.p.A (renamed Webuild S.p.A) and Cimolai S.p.A constitute the Galfar Al Misnad W.L.L - Salini Impregilo S.p.A - Cimolai S.p.A Joint Venture ("**GSIC-JV**"). We know that Galfar Al Misnad received a similar communication from your side and We presume that the other Partner of the GSIC-JV also received one. We will therefore generally refer to such communications as ("**Your Letters**"). As a joint venture, we respectfully request that you please address the joint venture and not its individual entities, which cannot individually speak for the GSIC-JV without the participation and agreement of all partners.

As you are likely aware, in 2015, GSIC-JV was appointed by Aspire Foundation ("**Aspire**") to be the main contractor for the construction of the Al Bayt Stadium (the "**Al Bayt Stadium Project**") in Al Khor, a city about 50 km North of the capital Doha.

Your Letters state that Equidem has come across workers employed by our JV that you believe are being subjected to labour exploitation. We take the statements made in Your Letter regarding our workers very seriously and respond for and on behalf of the GSIC-JV Partners as follows.

A Joint Venture operating as:  
Galfar Al Misnad – Salini Impregilo – Cimolai – JV





The Al Bayt Stadium Project is a mega multi-million dollar construction project, and it involves a complex matrix of Main Contractors, more than 150 separate sub-subcontractors, and by extension, several thousands of direct and indirect workers, as well as numerous independent entities, which GSIC-JV does not contractually or directly control, supervise, manage, pay or oversee.

Nonetheless, GSIC-JV takes great pride in its role as the main contractor on the Al Bayt Stadium Project and uses its best efforts and all leverage at its disposal to ensure that all its workers and subcontractors' workers associated with the Al Bayt Stadium Project are treated humanely, with dignity and respect, and are paid their full wages on time, without delay and in accordance with Qatari legal requirements, as well as international labour and human rights standards. We outline below some of the policies and practices we have adopted on the project to protect workers' rights.

Although GSIC-JV does not customarily share project-related information with third parties unless necessary, we will on this occasion share some information with Equidem, given the circumstances, in a good faith effort to address and alleviate the concerns raised in Your Letters, and to demonstrate our commitment to protect and uphold the safety, welfare and payment rights of the workers involved in the Al Bayt Stadium Project.

#### 1. Compliance with Workers' Welfare Standards:

GSIC-JV uses its best efforts and all leverage at its disposal to ensure that all its contractors and subcontractors on the Al Bayt Stadium Project comply with and adhere to the requirements of the Supreme Committee (the "**Supreme Committee**") for Delivery and Legacy's Workers' Welfare Standards ("**Workers' Welfare Standards**"), which cover health and safety, employment, working and living conditions, the provision of grievance mechanisms and other issues, and which include the obligation to pay workers, procure required residency permits and health cards and prohibit charging workers recruitment fees. GSIC-JV believes these objectives are not only essential and mandatory, but also crucial to the protection of workers' rights and the fostering of a safe, efficient and productive work environment.

In fact, we can confirm that the Qatar 2022 Workers' Welfare Standards Edition II are being adopted on this Project and are committed to adhere to various employee treatment standards including, amongst other things, fostering a healthy and safe work environment, protection of dignity, compliance with labour standards, maintaining acceptable living conditions, avoid excess working hours, payment of wages on time and prohibiting retaliation against workers for expressing grievances.

The above high standards are evident in the accommodation and living conditions that GSIC-JV have provided to our workers at the **Al Bayt Village Camp Accommodation**, the quality of which are of far above the industry norms.

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## **2. Ensuring Full and Timely Payment of Salaries and Wages:**

As you are likely aware, the Qatar Labour Law requires all employers, including GSIC-JV (directly or through the Partners), to pay all employees in Qatar through the automated Wage Protection System (“WPS”) in order to ensure that all workers in Qatar are paid their salaries (including severances, or Final Settlement as called in the Middle East Countries) through an electronic salary transfer on time and without delay.

The WPS enables the Ministry of Labour to continuously monitor and track salary and final settlement payments and to thereby ensure the timely and full payment of salaries/severances and compliance with the provisions of the Qatar Labour Law. The WPS also assists the judiciary in issuing judgments and settling labour disputes concerning employee payments and entitlements. Knowing that salary payments to workers are being tracked and monitored forces employers to pay their employees and workers on time and without delay, absent exceptional circumstances.

## **3. Compliance with Health and Safety Guidelines:**

GSIC-JV prides itself on having an extremely efficient HSE Management Plan in place to look after the necessary welfare and hygiene requirements of all staff and workers on the Al Bayt Stadium Project in accordance with Qatar 2022 Workers Welfare Standards Revision 2.

In line with the GSIC-JV HSE Management Plan and following Qatar Ministerial guidelines, GSIC-JV has employed all necessary safety measures to ensure that the health of all workers employed on the stadium have not been at risk during the period Covid 19 pandemic.

## **4. Ethical Treatment of all Workers:**

GSIC-JV has employed multiple nationalities during the construction of the Al Bayt Stadium, all of which have been treated the same without any discrimination to race, religion or ethnicity. GSIC-JV has adopted a strict Code of Ethics policy which ensures that all are treated without any discrimination and provided equal work opportunities based on professional qualifications and performance.

Additionally, GSIC-JV promotes the advancement and career promotion of our staff and workers as can be evidenced by some of our people who have been with the company for several years. Employer change and release of No-Objection Certificate as well as Employment Certificate are also integral part of the JV Policy to ensure a fair and reasonable treatment of all employees who wish to transfer to any other Company.

## **5. Workers’ Grievance Mechanisms:**

As part of our efforts to protect workers’ rights, we continuously inform workers that they can anonymously report grievances. To that end, we display flyers on various notice boards, which includes a Toll-free Workers’ Grievance Hotline telephone number, and which is publicized in more than one language to be readily accessible to workers.

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The flyer informs workers that: *“All grievances are anonymous and will be handled efficiently and confidentially by a member of the Supreme Committee for Delivery & Legacy. You can also reach out to your Workers’ Welfare Officer or elected Workers’ Representative, and ask them to raise your complaint during a Workers’ Welfare Forum.”*

GSIC-JV therefore used its best efforts to keep workers informed and appraised of how they can express any grievances or concerns, anonymously or through a representative, and which agencies they can approach to seek redress for their grievances without fear of reprisal.

**6. GSIC-JV’s Position:**

GSIC-JV has indeed used its best efforts to ensure that it fully comply with the Workers’ Welfare Standards and, in particular, with their obligations to pay all workers involved in the Al Bayt Stadium Project on time and without delay.

Besides being constantly monitored by our Employer, the Supreme Committee and various other Ministerial Departments, we are constantly monitoring our compliance with the Workers’ Welfare Standards and their contractual obligations, and as noted above, we also put grievance mechanisms in place in order to provide a platform that enables workers to express grievances without fear of reprisal, and to address such grievances.

We therefore strongly reject any allegations contain in Your Letters and We trust that the above is responsive to the concerns raised in Your Letters. We also wish to point out that Webuild is only involved in the Design and Construction of the Al Bayt Stadium Project and that Webuild S.p.A. has no involvement in the Khalifa International and Al Rayyan Stadiums, as wrongly mentioned in Table 3 of the Report.

Finally, we respectfully note that any use of the information contained in this letter that is inaccurate, misleading, taken out of context and/or which may defame GSIC-JV and/or harm its reputation will be considered to be actionable. We respectfully reserve our legal rights in this respect.

For and on behalf of GSIC-JV.

Yours faithfully,  
GSIC Joint Venture

For and on behalf of Galfar Al Misnad:

  
Mr. Hemachandran

For and on behalf of Webuild S.p.A:

  
Mr. Leonardo Blanda



Mr Mustafa Qadri



Zurich, 10 November 2022

**Response to your letter regarding the protection of workers involved in the construction of FIFA World Cup Qatar 2022™ sites**

Dear Mr Qadri,

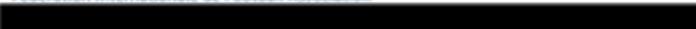
Thank you for your letter to the FIFA President dated 21 October 2022, the content of which has received our full attention.

Let me start by reaffirming FIFA's steadfast commitment to the protection of internationally recognised human rights across all its activities. These commitments are enshrined in articles 3 and 4 of the FIFA Statutes as well as in FIFA's Human Rights Policy, reflecting FIFA's responsibility under the United Nations' Guiding Principles on Business and Human Rights. The [FIFA World Cup Qatar 2022™ Sustainability Strategy](#) further specifies these commitments and the strategic programme implemented towards ensuring respect and protection of human rights in the context of this particular tournament.

FIFA implements its comprehensive programme to deliver on the joint strategy together with its Qatari counterparts, and in particular the Supreme Committee for Delivery & Legacy (SC). In that respect, we would like to share three considerations in response to your letter.

First, most of the questions in your letter relate to the overall systems implemented over the past years by the SC's Workers' Welfare Department in relation to FIFA World Cup™ construction sites. As you know, the SC has been remarkably transparent on their mechanisms and related outcomes. This includes detailed information about points raised in your questions, such as the nature of the overall audit and compliance scheme, steps taken to identify and address issues related to wage payments, the efforts to ensure workers can raise their concerns through multiple, safe channels, as well as consequences for contractors who failed to comply with the SC's Workers' Welfare Standards. Information in that respect can be found in the yearly Workers' Welfare Progress Reports published by the SC's Workers' Welfare Programme since 2015.

In addition, the SC has, over the years, systematically invited experts for independent external scrutiny and advice to evaluate and further strengthen their systems. The two most notable elements of the programme in that respect have been: (1) the collaboration with the international union for





construction workers, Building and Woodworkers' International (BWI), which included regular joint inspections on FIFA World Cup sites since 2017; and (2) the invitation for an independent monitor, the UK-based firm Impactt Ltd, to conduct its own evaluations of the effectiveness of the SC's efforts, including through separate independent inspections of contractors involved in FIFA World Cup-related work. Yearly reports have been published on both these collaborations since 2016, jointly between the SC and BWI on their inspection programme, and separately by Impactt on its findings.

We would therefore like to refer you to the reports from the SC, BWI and Impactt published on [this website](#) for further information with respect to your questions on the overall measures taken to protect construction workers on FIFA World Cup sites.

Second, in your letter, you share labour rights concerns from interviews conducted with individual workers who were employed on FIFA World Cup construction sites. We would like to stress that none of the practices reflected therein, if substantiated, are acceptable to FIFA. We would also like to note that it is precisely these types of company malpractice that the workers' welfare programme for FIFA World Cup workers set out to prevent and, where identified, address. As has been found and recognised repeatedly by various independent experts assessing the programme over the years, tens of thousands of workers have in fact benefited from heightened standards through these efforts.

Based on FIFA's own close collaboration with the SC on this topic over the last ten years, the findings of BWI and Impactt, as well as the validation and recognition from other independent organisations in the field, FIFA has every reason to trust in the SC's resolve and commitment to protecting the workers involved in the preparation and delivery of the FIFA World Cup. Against this background, these issues could have been confirmed and duly addressed, as necessary, had the information gathered through worker interviews been shared with either FIFA or the SC sooner for it to be verified, which would have been in the best interest of the workers concerned. Despite the more challenging nature of verifying and addressing such issues once a project has ended, we would nevertheless encourage workers to raise possible open queries through the SC's Workers' Welfare hotline or the FIFA Human Rights Grievance Mechanism.

Third, with regards to long term legacy, FIFA remains in positive ongoing dialogue with the International Labour Organization (ILO), the International Trade Union Confederation (ITUC) and all relevant authorities in Qatar over initiatives that will benefit migrant workers in Qatar long after the final game of the World Cup. As is widely recognised, the FIFA World Cup has served as a catalyst for labour reforms in Qatar – with innovations implemented by the SC on FIFA World Cup sites often described as an incubator for several of the countrywide reforms – and FIFA is intent on continuing to play its role in that respect together with other organisations in the field.

In closing, while the efforts to ensure the protection of workers involved in the preparation and delivery of the FIFA World Cup has not been without challenges, it is important to recognise the strong systems implemented by the SC for FIFA World Cup construction workers and the measures jointly implemented by the SC and FIFA for workers involved in the hospitality and other service sectors associated with the FIFA World Cup Qatar 2022. We consider this important because failure to recognise real progress risks undermining the efforts of those who led the charge in bringing about positive change and limits their ability to further push the envelope towards our shared objective of further improving the systems to protect workers' rights in Qatar and beyond.



We trust this information, together with the reports referred to in this letter and the feedback shared by the SC, addresses the queries raised in your letter and trust that that the efforts by FIFA and the SC will be reflected fairly in your report and communications on the matter.

With kind regards,

A handwritten signature in blue ink, appearing to read 'AG', is positioned above the printed name.

Andreas Graf  
Head of Human Rights & Anti-Discrimination



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