

JOINT SUBMISSION TO THE UNIVERSAL PERIODIC REVIEW OF QATAR

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Submitted by the Coalition on Labor Justice for Migrants in the Gulf

INTRODUCTION

1. This is a submission by the Coalition on Labor Justice for Migrants in the Gulf, a new coalition founded in 2023 of international civil society organisations and global union federations representing independent trade unions. The Coalition is calling for governments and employers to respect the agency of migrant workers in Gulf Cooperation Council (GCC) countries to exercise their fundamental human and labour rights throughout recruitment, migration, employment, and return.
2. This submission examines Qatar's compliance with its international human rights obligations to protect the rights of migrant workers, particularly for those workers employed in construction, security, and domestic work. We assess Qatar's implementation of recommendations received during the third UPR cycle and provide follow-up recommendations.
3. The information in this submission is sourced from direct evidence collected by members of the Coalition on Labor Justice for Migrants in the Gulf, including first-hand testimony from workers in the domestic work, security, and construction sectors¹ in Qatar. These have been analysed alongside legal desk research and reports of initiatives undertaken by the Government of Qatar.

EXECUTIVE SUMMARY

4. To activate the National Vision Plan 2030, 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, Qatari nationals legally wield significant levels of control over migrant wage workers through labour market deregulation. 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.
5. Persistent and widespread human and labour rights violations,² including forced labour 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, significant surveillance of workers, and threats of reprisals from the state and employers for speaking about labour conditions. These entrenched practices are used by employers to create a captive and controllable workforce. This hostile environment for migrants, on top of a steep power imbalance between workers and employers, heavily undermines Qatar's initiatives to safeguard migrant worker rights. The fact that such widespread labour abuse persists suggests

that the reforms undertaken over the last five years have acted as cover for powerful businesses to continue to exploit migrant workers with impunity.³

6. During the third UPR cycle, the Government of Qatar received 52 recommendations relating to the protection of migrant workers.⁴ Of these, the Government of Qatar supported 39⁵ and noted 13.⁶
7. Although Qatar is engaging with the ILO to improve conditions for migrant workers, our research shows that during the reporting period the Government of Qatar has demonstrated a weak record on implementing third cycle recommendations, including on implementing existing worker protection laws - particularly around recruitment fees and wage theft - resulting in migrant workers experiencing significant human rights violations. Migrant workers face abusive workplace conditions, particularly related to exposure to excessive heat without proper occupational health and safety precautions. Furthermore, migrant workers report facing intimidation and threats for reporting violations, which relates to an inability to exercise the fundamental right of freedom of association. Despite initiatives to streamline grievance mechanisms for migrant workers and strengthen labour inspections, these rights violations remain largely unchecked.⁷

RIGHTS OF MIGRANT WORKERS

8. During the third cycle, the Government of Qatar supported a recommendation to “Continue ongoing measures to bring in labour laws in Qatar aimed at ensuring the application of the highest international standards”.⁸ An additional 13 recommendations supported by the Government of Qatar called for the protection of migrant worker rights.⁹ Whilst some measures have been taken, significant challenges remain, notably in the areas of freedom of association and slavery-like practices.

I. Freedom of association

9. The Government of Qatar does not allow migrant workers to form or join trade unions.
10. Qatar has not ratified the ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (C87) or the Right to Organise and Collective Bargaining Convention, 1949 (No. 98). Qatar also has not ratified the UN International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICPMW); 6 recommendations were noted by Qatar specifically calling for ratification during the third cycle.¹⁰ Article 26 of the ICPMW covers freedom of association.
11. Freedom of association – including the right to form and join unions, hold leadership in unions, and collectively bargain – is a critical enabling right for all workers, particularly migrant workers, and is the most effective method to tackle issues of forced labour, trafficking, and other labour and human rights violations.¹¹ Freedom of association is a cornerstone right because it creates the structural conditions for trade unions and workers’ movements to intervene in structural violence by advancing, defending, and enforcing all other labour rights.

II. Prohibition of slavery, trafficking

12. During the third cycle, the Government of Qatar supported two recommendations pertaining to forced labour: “Implement necessary reforms to develop the contract systems to improve the recruitment procedure of migrant workers and prevent forced labour”¹²; and “Continue its efforts to reform workers’ rights to reduce the risk of migrant workers being subjected to forced labour, including by removing the requirement for migrant workers to obtain the permission of their current employer before moving to a new job, and abolish the requirements for an exit visa for all workers.”¹³
13. During the third cycle, the Government of Qatar also accepted recommendations pertaining to forced labour indicators. The Government of Qatar accepted one recommendation pertaining to employers retaining worker identity documents.¹⁴ The Government of Qatar also accepted three recommendations pertaining to combating physical and sexual violence against migrant workers and to eradicate gender-based violence.¹⁵

Action taken

14. In 2021, Qatar released a handbook for law enforcement and frontline workers who protect and provide support to victims of forced labour and human trafficking.¹⁶

Ongoing challenges

15. Coalition partner investigations found that migrant workers employed in the construction, domestic work, and security sectors in Qatar were subjected to various combinations of all 11 of the indicators of forced labour.¹⁷
16. Coalition partners documented clusters of forced labour indicators in the domestic work, construction, and security sectors in Qatar.¹⁸ In the domestic work sector, we documented abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding wages, debt bondage, abusive working and living conditions and excessive overtime.¹⁹ In the construction and security sectors, we found abuse of vulnerability, deception, intimidation and threats, withholding wages, abusive working and living conditions, and excessive overtime.²⁰
17. These indicators of forced labour, when taken together, can and do create forced labour conditions for migrant workers in Qatar. Individual indicators are described in detail in subsequent sections, but these should be understood together as resulting in forced labour conditions or a high risk of forced labour for migrant workers in Qatar. In an illustrative case, an Indian worker employed through a contractor in the stone cutting section, working on Al Bayt Stadium reported that he was recruited through deception, was forced to work without payment during the COVID 19 pandemic, and faced abusive working conditions, physical and verbal abuse, and threats. His employer retained his passport, and he had no effective means to report his conditions or seek redress:

“The employer did not comply with the verbal promises. My agent said that I would get 2,000 rial (USD 549.26) but that did not happen. I am only getting 1,200 (USD 329.56) base salary. 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. We were forced to work in the lockdown. I have not received my salary from that time.” Notably, this worker’s passport was also held by his employer and he and other workers on site were routinely subjected to discrimination and verbal and physical abuse.

He explained: *“There is a lot of discrimination going on here. My job is that of a stone helper, but they also ask me to clean garbage and do cleaning work. If you refuse, sometimes they will slap you. There is no one to listen here.”* Workers on the site were also subjected to excessive work, denied drinking water on site, and made to stay in overcrowded housing: *“I have night duty. 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, we have to go a distance away to get water. The supervisors here are very rude. They shout and abuse when workers drink water and go to the toilet. This is a daily thing. Workers can’t rest for even two minutes on duty. If you are found resting, you hear abuses.”* During ongoing inspections by FIFA and the Supreme Committee for Delivery and Legacy, he described a company practice of moving workers to alternate sites or sending them back to work camps on days when independent inspections were planned. On this site, workers had no procedures to report rights violations, and when they did raise issues, they faced retaliation. He explained: *“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 of abuse, assaults, and threats to be fired.”*²¹

III. Constitutional and legislative framework

18. During the third cycle, the Government of Qatar supported a recommendation to “Expand efforts and ongoing work on labour-sector reforms and improve the legal protection granted to migrant workers”.²² While the Government has made legislative changes removing the requirement of No Objection Certificates (NOC) to change employers, workers still face challenges in leaving jobs and moving to new ones. In addition, while the Government of Qatar has established a minimum wage, salaries for migrants continue to be extremely low.

i. Abolishing the kafala system

19. Under the *kafala* system, workers in Qatar required permission from their employers to change jobs, making workers overly dependent on their employers and creating situations of labour exploitation that can amount to forced labour. During the third cycle, the Government of Qatar supported three recommendations calling for abolition of the kafala system.²³ The Government of Qatar also noted a recommendation to abolish the kafala system and to include workers that are not covered by the present labour code.²⁴
20. The Government of Qatar accepted recommendations that included calls to abolish the NOC,²⁵ and one recommendation to commit to a timeline for abolishing the NOC requirement.²⁶

Action taken

21. In 2020, the Government of Qatar made changes to the *kafala* system. Law No. 19 of 2020 removed the requirement of an NOC. This change allows workers to change jobs at any time, after a notice period of up to two months. In addition, migrant workers (including domestic workers) no longer require an employer-approved exit permit to leave the country.²⁷

Ongoing challenges

22. Despite these changes, the ILO reports that workers still face challenges in leaving jobs and moving to new ones, including retaliation from employers — including cancelling workers' residency permits or filing retaliatory “absconding” charges.²⁸ While Qatar’s Ministries of Labour and Interior have linked electronic systems to cross-check information and prevent employers from taking such actions, more work is needed to stop retaliation practices.²⁹
23. Domestic workers have reported to the Coalition that they have received threats from their employers when they have requested to change employment. A domestic worker said her employer threatened to deport her rather than let her transfer employer.³⁰ Furthermore, employers often threaten domestic workers with filing an “absconding” complaint, which means the worker will be deported. One employer kicked a domestic worker out of her housing because she requested to change employers but was unable to pay the cost of the NOC.³¹ For workers, the threat of employers filing criminal absconding charges and the fear of being detained and deported is still an important deterrent to changing jobs.³² The lack of information about labour mobility is also an important obstacle to changing jobs. According to the ILO, procedures and regulations must be clarified so that they are well understood by all workers and employers who could benefit from the reforms.³³
24. Consistent with these ILO findings, when Coalition partners spoke with workers from The Gambia, Nigeria, Pakistan, India and Kenya in 2023 and 2024, the workers were unaware that an NOC was no longer required to change employers. This suggests that migrant workers have not been well informed about labour law changes, and still perceive that employers have the authority to prevent them from transferring between employers.³⁴

IV. Right to work and to just and favourable conditions of work

ii. Minimum wage

25. During the third cycle, the Government of Qatar supported a recommendation calling for effective labour laws and systems for migrant workers, including wage protection systems: “Further protect and promote the rights of migrant workers through effective labour laws and systems for wage protection and labour inspection, and through sustained cooperation with the ILO”.³⁵

Action taken

26. In 2020, the Qatari government adopted a non-discriminatory minimum wage that applies to all workers, of all nationalities, in all sectors including domestic work. The law came into force in March 2021.³⁶ According to the ILO, this resulted in 13% of the workforce or 280,000 people seeing their wages rise to the minimum threshold.³⁷
27. Employers are also obliged to transfer employees’ wages through Qatari banks, allowing the Ministry of Labour to monitor the transfers and reduce wage abuses.³⁸
28. The Government of Qatar increased the penalties for non-payment of wages. A fund established by the Government has disbursed \$630 million to workers since 2019, demonstrating the scale of persistent wage abuses.³⁹

Ongoing challenges

29. Despite the recent establishment of minimum wage protections in Qatar, salaries for migrants continue to be low. The migrant workers interviewed by Equidem in the construction sector 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).⁴⁰
30. Nationality-based wage discrimination, moreover, persists. Coalition research has found that nationality-based wage discrimination in construction, maintenance and security sectors in Qatar is widespread, systematic, and carried out in plain sight.⁴¹
31. Coalition research found that migrant workers in Qatar experience rampant wage theft and/or withholding of wages that constitute an indicator of forced labour.⁴² Construction, maintenance, and security workers employed on FIFA World Cup Qatar 2022 stadiums reported widespread wage theft. Some workers received no wages and benefits or less wages and fewer benefits than they were owed. Some had their salaries unilaterally cut or were required to work overtime without compensation.⁴³
32. In the lead up to the FIFA World Cup Qatar 2022, Coalition partners documented systematic employer practices aimed at falsifying wage records. Workers described a practice by employers of sharing wage records during inspections that do not represent the actual wages paid to workers.⁴⁴

Initiatives between the Qatar government and the International Labour Organization's national office established in Qatar

33. During the third cycle, the Government of Qatar supported a recommendation to “Continue implementing action suggested by the International Labour Organization’s national office established in Qatar”.⁴⁵

iii. Social dialogue

Action taken

34. The ILO has worked with the Government of Qatar to advance social dialogue through new legislation that has led to the establishment of joint worker-management committees at the enterprise level.⁴⁶

Ongoing challenges

35. Qatar’s recent work on joint labour management committees with the ILO⁴⁷ represents a first step towards recognising the power of workplace cooperation, but recognition of workers’ fundamental right to associate - critical to the effectiveness of those committees - remains distant.
36. Without substantial reforms to protect their independence, the functioning of these committees is at risk of subversion by management representatives. They do not provide the pathways to advance workers’ rights, address rights violations, ensure protection from anti-union discrimination or retaliation - all of which are essential for workers to exercise their full right to freedom of association. For instance, a Bangladeshi security guard described how complaints resulted in company management changing committee leaders:

“if the representatives raised any issues on worker’s rights . . . then they changed the representatives instead of solving the issues.”⁴⁸ Migrant domestic workers do not have access to any representation by Joint Committees given their employment in private homes. Worker knowledge about the joint committees and how to access them is limited. Of 66 workers interviewed by Business and Human Rights Resource Centre, only 14 workers said they were aware of a worker committee and 52 stated that there was definitely no committee available to them.⁴⁹

37. The Worker Welfare Forums established by the Supreme Committee at FIFA stadium construction sites could have been enhanced and extended to cover all migrant workers in Qatar, beyond the 2022 FIFA World Cup. Instead, the forums were disbanded once the tournament came to an end.⁵⁰

iv. Fair recruitment

Action taken

38. The ILO has worked with Qatar to establish 14 Qatar Visa Centres in 6 countries to provide information to migrants; to identify and close 45 non-compliance recruitment agencies in 2022, and four in 2023; to assess the existing system for licensing and monitoring private recruitment agencies; implemented 1 pilot on fair recruitment from Bangladesh to Qatar; and adopted a revised standard employment contract for domestic workers with at least some implementation for migrant workers from Bangladesh, India, Sri Lanka and Pakistan.⁵¹

Ongoing challenges

39. Although Qatari law prohibits the practice of charging recruitment fees, the ILO reports that a recent survey conducted by the Social and Economic Survey Research Institute of Qatar found that 54% of low-wage workers paid to come to Qatar. Recruitment debt puts workers in vulnerable situations in which they are more prone to exploitation or abuse.⁵²
40. Coalition research also found that migrant workers across sectors report paying significant recruitment fees in order to secure their jobs—sometimes for jobs that were not accurately depicted in their contracts, which fosters deception and abuse of vulnerability and contributes to creating conditions of forced labour.⁵³
- a. All the construction workers interviewed by Equidem since September 2020 described paying illegal recruitment fees, ranging from USD 99 to USD 4,500.⁵⁴
 - b. Filipino and Sri Lankan workers engaged in focus groups by Coalition partners describe that they often had to incur debts, selling property or borrowing money. Focus group participants reported paying a significant portion of their salaries as placement fees, as well as other costs like medical and government fees for overseas employment certification. One migrant domestic worker was asked to pay two months of her salary for unclear reasons by the agency.⁵⁵
 - c. Charging recruitment fees breaches Labour Law No. 14 of 2004, and Entry, Exit and Residence Law No. 21 of 2015⁹, which states that *“it is clearly prohibited by the Labour Law to charge workers recruitment fees or expenses or any other costs.”*
41. Beyond being contrary to existing Qatari laws, such recruitment fees leave migrant workers vulnerable to further abuse, as the imperative to repay debts associated with recruitment

costs creates pressure to remain in a particular employment situation despite exploitative working conditions, in part due to the tenuous nature of migrant workers' visas.

42. It is important note that debts incurred from high recruitment fees not only impact experiences in Qatar, but also upon return to a migrant worker's country of origin. In 2023 and 2024, Equidem maintained contact with migrant workers terminated from Stark Security, a security company contracted by FIFA to provide security services for the 2022 FIFA World Cup. Workers who returned to their home countries reported being in even more desperate and vulnerable situations than they were in prior to when they originally left for Qatar. Some have taken out additional loans to pay off previous recruitment and visa fees or for the fees to migrate to a new country such as Saudi Arabia, while others are struggling to support themselves and their families and, in some cases, even survive.⁵⁶ This case exemplifies the necessity for workers to have access to justice even upon return to their country of origin.
43. Coalition research also identified contract substitution practices. Upon paying high recruitment fees, migrant domestic workers report being presented with secondary contracts in a language they do not understand and with unclear expectations of the job they are to take on –creating further potential for exploitation. One Kenyan worker reported paying \$8,000 in recruitment fees for a marketing job in Qatar, and upon arrival found that no such job existed and had to take up a role as a domestic worker. A similar case was reported by a Ghanaian worker.⁵⁷ Advocates note that this type of contract substitution is more common among African migrant domestic workers.⁵⁸

v. Occupational health and safety

Action taken

44. The ILO has supported Qatar in passage and implementation of the National Labour Inspection Policy (2019), Occupational Health and Safety Policy (2020), and a non-discriminatory minimum wage (2021).⁵⁹
45. The ILO is working with the Government of Qatar to establish a dedicated department for Occupational Health and Safety within Qatar's Ministry of Labour that is expected to focus on prevention of accidents at work and compliance of laws to protect workers. In 2023, however, construction workers reported working up to 12 hours a day in gruelling heat.⁶⁰
46. The ILO has supported Qatar in developing and implementing a methodology to publish a report on worker deaths.⁶¹ The report '*One is too many*' found that, in 2020, at least 50 migrant workers lost their lives and just over 500 were severely injured in work-related incidents.⁶²

Ongoing challenges

47. Coalition research establishes that migrant workers continue to be subject to occupational health and safety dangers, including excessive heat, lack of proper nutrition, poor accommodation, and extended working hours in cold and dusty conditions, and throughout the COVID-19 pandemic.⁶³
48. In 2023, construction workers interviewed by Equidem reported working up to 12 hours a day in gruelling heat.⁶⁴ These reports represent violations of Ministerial Decree (No. 17) in 2021, which provided an extended midday outdoor work ban during the summers.⁶⁵

49. 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 were forced to work through sickness and exhaustion under threats of termination of their contracts. Workers who contracted COVID-19 were quarantined until they were no longer contagious, and then made to return to work immediately.⁶⁶
50. Migrant domestic workers have similarly faced occupational health and safety risks. Five Kenyan women in Qatar reported not receiving salaries for five months, while living in “unsuitable” accommodation in which no food or food stipend was provided.⁶⁷ Such issues are underreported among domestic workers and are more difficult to directly investigate because the “worksite” is a private home, shielded from labour inspections under Qatar’s privacy law.
51. Workers employed by Stark Security and interviewed by Equidem reported company practices of cutting their food and water supply.⁶⁸
52. The Government of Qatar has not ratified the ILO Occupational Health and Safety Convention, 1981 (No. 155) or the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

vi. Labour inspections

Action taken

53. The ILO has supported Qatar in the passage and implementation of a National Labour Inspection Policy (2019).
54. The ILO has also supported Qatar’s Labour Inspection Department in conducting campaigns to raise awareness on heat stress legislation, conditions in shared accommodation, and the top causes of occupational injuries.⁶⁹

Ongoing challenges

55. In the lead up to the FIFA World Cup Qatar 2022, Coalition partners documented systematic employer practices aimed at preventing workers from reporting rights violations. Despite ongoing inspections by FIFA and the Supreme Committee for Delivery and Legacy, workers have described being unable to bring their concerns to inspectors. For instance, workers employed on Al Bayt Stadium described being moved off site during inspections. Workers also described fearing retaliation if they approached officials during inspections.⁷⁰
56. Inconsistent penalties to employers for confirmed rights violations undermines accountability for rights violations.
57. Coalition partners communicated with a spokesperson for Qatar government’s international media office, who said that an investigation found that Stark Security had failed to comply with all of Qatar’s labour laws and would be penalized. However, it is unclear how they were punished, if at all.⁷¹
58. It is also important to note that coalition partners have identified three instances in which sponsors have been held accountable for putting workers in conditions of forced labour, and those workers were awarded with compensation following their complaints lodged through

the Ministry of Labour.⁷²

vii. Right to an effective remedy

59. During the third cycle, the Government of Qatar supported a recommendation to “Continue further measures to promote and protect the rights of migrant workers by ensuring effective access to complaint mechanisms and enhancing their welfare”;⁷³ and a recommendation to “Take appropriate measures to eliminate obstacles that stand in the way of the rights of migrant workers when it comes to access to justice, guarantee all measures to protect them from ill-treatment and abuse while punishing the perpetrators of abuse, and ensure that they get paid on time”.⁷⁴

Action taken

60. The ILO has supported Qatar to establish a new online platform for workers to submit complaints.⁷⁵

Ongoing challenges

61. Coalition partners have documented systematic retaliation against migrant workers who report rights violations, including verbal and physical abuse and harassment, increased workloads, termination, and police cases.⁷⁶

62. Constant fear of losing their jobs is a significant barrier to reporting rights violations. Construction 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 maintained through nationality-based discrimination and workplace violence—including physical, verbal, and mental abuse.⁷⁷

63. Domestic workers report facing verbal abuse, threats and intimidation for making complaints. One worker reported receiving threats of both bodily harm and “being sold” for complaining.⁷⁸

RECOMMENDATIONS TO THE GOVERNMENT OF QATAR

Freedom of association

- Pass legislation recognising workers’ right to freely associate, organise, bargain and form a trade union in line with international labour conventions.
- Ratify and effectively implement the ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (C87) and the Right to Organise and Collective Bargaining Convention, 1949 (No. 98).

Prohibition of slavery, trafficking

- Effectively implement the ILO Forced Labour Convention, 1930 (No. 129).
- Ratify and effectively implement the ILO Protocol of 2014 to the Forced Labour Convention, 1930 (No. 29).

- Train labour inspectors to identify forced labour indicators as part of routine labour inspections, especially for domestic workers. Ensure that inspectors take immediate action to safeguard the rights of all workers experiencing forced labour.
- Punish employers for forced labour with criminal sanctions. All breaches of the labour laws and sanctions imposed should be published on a regular basis and made publicly available.
- Intensify awareness efforts for migrant workers around what is considered a legally permissible contract, how to identify forced labour, and resources to help if they find themselves in forced labour.
- Penalise companies that subject workers to forced labour conditions. Sponsors who put their employees under forced labour conditions should face repercussions beyond paying a fine, and should face additional consequences such as the inability to purchase a subsequent business licence.

Constitutional and legislative framework

Abolishing the Kafala system

- As laid out in the U.S. Department of State’s 2023 Trafficking in Persons Report, prohibit employers from filing “absconding” charges or cancelling residency permits in retaliation for workers utilising these reforms and hold non-compliant employers accountable with adequate penalties.⁷⁹

Right to work and to just and favourable conditions at work

Minimum wage

- Require employers to produce proof of wages paid in full and in a timely manner through the Wage Protection System (WPS), and shown in WPS documentation of transfers, as paperwork signed by workers confirming wages can be easily falsified. Furthermore, employers should be required to produce and enforce transparent salary grades through evidence-based and objective criteria – and companies should demonstrate enforcement of such salary grades through contracts and corresponding WPS payments.
- Ensure all workers are paid equally for equal work, regardless of their nationality or any other protected characteristic. Require employers to provide regularly updated wage scales based on job requirements. Ensure that workers’ salaries are determined in line with these standards rather than on the basis of their nationality or migration status.
- Consistent with ILO recommendations and in line with international standards, data, including the cost of living, should be collected for a review of the minimum wage. Qatar’s Minimum Wage Commission should consult with workers’ and employers’ representatives to periodically review and propose adjustments to the minimum wage.⁸⁰
- Ratify and effectively implement the ILO Equal Remuneration Convention, 1951 (No. 100).

Social dialogue

- Establish a genuinely independent Migrant Worker Centre as a key first step towards advancing social dialogue, freedom of association and creating a modern, rights-respecting labour system in Qatar.

- Consistent with ILO recommendations, including feasibility assessments, make joint committees mandatory for companies of a certain size; increase the number of joint committees within key sectors such as transport, construction, and hospitality; and create sectoral bodies to support the objective of broader social dialogue and the industry level.⁸¹ These measures can be a complimenting procedure but cannot be seen as an alternative to the right to form and join trade unions.

Fair recruitment

- Protect migrant workers from paying recruitment fees for their employment and initiate investigations and legal actions against employers and recruitment agencies that impose such fees on workers.
- Consistent with ILO recommendations, fair recruitment practices and lessons learned should be promoted and expanded to private and public sector recruitment actors.
- Ratify and effectively implement ILO Migration for Employment Convention, (No. 97), Migrant Workers (Supplementary Provisions) Convention, (No. 143), and Violence and Harassment Convention (No. 190).
- Ratify the UN Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.
- Consistent with ILO recommendations, expand rights protections for domestic workers as laid out under the ILO Domestic Workers Convention, 2011 (No. 189).

Occupational health and safety

- Mandate that employers provide workers with easy access to water and refrigerated food storage facilities at work sites, along with fully air-conditioned accommodations and rest areas.
- Ensure that essential healthcare services for low-income migrant workers are provided free of charge, regardless of their immigration status or possession of identity documents.
- Consistent with the findings of the ILO report *'One is too many'*, expand the definition of work related injuries and fatalities to include injuries and fatalities that may be work related but are not currently categorised as such.⁸²
- Ratify and effectively implement the ILO Occupational Health and Safety Convention, 1981 (No. 155) and the Government of Qatar has not ratified the ILO Occupational Health and Safety Convention, 1981 (No. 155).

Labour inspections

- Strengthen labour inspections of workplaces, particularly for domestic workers:
 - Labour inspections should include engagement with migrant workers directly in a manner that enables workers to share their concerns while protecting workers' privacy and safeguarding workers from retaliation.
 - Labour inspections should occur on a regular basis, by staff trained on how to

recognize the indicators of forced labour.

- The results of labour inspections should lead to 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 workforce.

Right to an effective remedy

- Simplify procedures for migrant workers to submit complaints and enable workers to make complaints even after the worker has left Qatar.
- Consistent with ILO recommendations, ensure that workers have adequate guidance on required documentation and how to prepare for court hearings.
- Consistent with ILO recommendations, build the skills of conciliation staff through comprehensive training. Design standard operating procedures and monitor the efficiency of grievance mechanisms.

ENDNOTES

- ¹ **Construction sector:** From September 2020–October 2022, Equidem investigated the experiences of migrant workers employed on FIFA World Cup Qatar 2022 stadium construction sites, including interviews with 60 migrant workers from Bangladesh, India, Nepal, Kenya, and Uganda. In 2023, Equidem continued to monitor the construction sector in Qatar. **Domestic work:** Coalition partners held 2 focus groups with migrant workers in Qatar – primarily migrant domestic workers – between September and November 2023 with workers from India, Ghana, Philippines, Sri Lanka, and Kenya. **Security sector:** Equidem spoke with more than 80 migrant workers from India, Pakistan, Nepal, The Gambia, Kenya, Ghana, and Sudan who had signed 6-month contracts in August and September of 2022 with Stark Security.
- ² Equidem, [If we complain, we are fired: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites](#), 2022.
- ³ Equidem, [If we complain, we are fired](#), *op.cit.*
- ⁴ 134.233, 134.151, 134.73, 134.66, 134.264, 134.254, 134.154, 134.198, 134.184, 134.195, 134.247, 134.234, 134.133, 134.134, 134.241, 134.256, 134.260, 134.238, 134.266, 134.261, 134.267, 134.258, 134.251, 134.249, 134.263, 134.248, 134.245, 134.235, 134.242, 134.240, 134.237, 134.243, 134.244, 134.257, 134.265, 134.269, 134.236, 134.239, 134.246, 134.3, 134.13, 134.255, 134.11, 134.1, 134.2, 134.4, 134.5, 134.6, 134.62, 134.250, 134.259, 134.253
- ⁵ 134.233, 134.151, 134.73, 134.66, 134.264, 134.254, 134.154, 134.198, 134.184, 134.195, 134.247, 134.234, 134.133, 134.134, 134.241, 134.256, 134.260, 134.238, 134.266, 134.261, 134.267, 134.258, 134.251, 134.249, 134.263, 134.248, 134.245, 134.235, 134.242, 134.240, 134.237, 134.243, 134.244, 134.257, 134.265, 134.269, 134.236, 134.239, 134.246
- ⁶ 134.3, 134.13, 134.255, 134.11, 134.1, 134.2, 134.4, 134.5, 134.6, 134.62, 134.250, 134.259, 134.253.
- ⁷ Equidem, [If we complain, we are fired](#), *op.cit.*
- ⁸ 134.75 (India).
- ⁹ 134.233 (Indonesia), 134.66 (Democratic People’s Republic of Korea), 134.253 (Sri Lanka), 134.246 (Nigeria), 134.239 (Japan), 134.236 (Islamic Republic of Iran), 134.269 (India), 134.257 (Togo), 134.244 (Myanmar), 134.240 (France), 134.249 (Republic of Korea), 134.251 (Ghana), 134.267 (Bulgaria).
- ¹⁰ 134.3 (Republic of Moldova), 134.13 (United Kingdom of Great Britain and Northern Ireland), 134.1 (Mexico, Senegal), 134.2 (Honduras), 134.4 (Egypt), 134.5 (El Salvador).
- ¹¹ International Labour Organization, Walk Free, and International Organization for Migration, [Global Estimates of Modern Slavery Forced Labour and Forced Marriage](#), 2022.
- ¹² 134.264 (Bahrain).
- ¹³ 134.254 (Sweden).
- ¹⁴ “Criminalise the retention by employers of passports of migrant workers, reinforcing recent progress in labour rights”, 134.266 (Brazil).
- ¹⁵ “Adopt legislation to combat violence against women, including the protection of women migrant workers” 134.151 (Egypt); “Continue to promote its successful policy of combating violence against women and children in all its forms, particularly against domestic workers”, 134.195 (Bolivarian Republic of Venezuela); “Redouble efforts to eradicate gender-based violence and guarantee the full enjoyment of rights by migrants in this context”, 134.242 (Mexico).
- ¹⁶ National Committee for Combating Human Trafficking, [Our Fight Against Forced Labour and Trafficking for Labour Exploitation in Qatar](#), 2021.
- ¹⁷ Field research conducted by coalition partners.
- ¹⁸ Field research conducted by coalition partners; Equidem, 2022
- ¹⁹ Coalition partners held 2 focus groups with migrant workers in Qatar – primarily migrant domestic workers – between September and November 2023 with workers from India, Ghana, Philippines, Sri Lanka, and Kenya.
- ²⁰ From September 2020–October 2022, Equidem investigated the experiences of migrant workers employed on FIFA World Cup Qatar 2022 stadium construction sites, including interviews with 60 migrant workers from Bangladesh, India, Nepal, Kenya, and Uganda. In 2023, Equidem continued to monitor the construction sector in Qatar. For additional details, see Equidem, 2022.
- ²¹ *Ibid.*
- ²² 134.261 (Afghanistan).
- ²³ “Ensure the full implementation of new Acts Nos. 21 of 2015 and 10, 13 and 17 of 2018 related to the situation of migrant workers and launch new initiatives in order to completely abolish the kafalah system”, 134.265 (Belgium); “Continue the ambitious reforms undertaken in favour of migrant workers, in particular with a view to abolishing the sponsorship system, and repeal the exit authorization for all migrant workers”, 134.240 (France); “Continue strengthening measures to promote and protect the human rights of migrants, including by abolishing the confiscation of passports from migrant workers and enforcing the law abolishing kafala (Uganda)”, 134.258 (Uganda).
- ²⁴ “Swiftly develop and implement legislation to abolish the kafala system and, in the short term, include workers that are not covered by the Labour Code, thus guaranteeing the right to freedom of peaceful assembly and association for all inhabitants of Qatar, in line with Sustainable Development Goals 8 and 10”, 134.50 (Netherlands).
- ²⁵ 134.255 (Switzerland).
- ²⁶ 134.259 (United States).
- ²⁷ ILO, [Law No. 19 of 2020 \(Removal of NOC requirement\)](#).
- ²⁸ ILO, [What has changed for migrant workers in Qatar?](#) (published in November 2022, updated in November 2023).

29 *Ibid.*

30 Evidence from 2 focus groups with migrant workers in Qatar – primarily migrant domestic workers – between September and November 2023 with workers from India, Ghana, Philippines, Sri Lanka, and Kenya. Data on file with Coalition partners.

31 Evidence from 2 focus groups with migrant workers in Qatar – primarily migrant domestic workers – between September and November 2023 with workers from India, Ghana, Philippines, Sri Lanka, and Kenya. Data on file with Coalition partners.

32 Business and Human Rights Resource Centre, [After the final whistle: Migrant workers speak out on exploitation during Qatar World Cup 2022](#) (June 2023), p. 18-19.

33 ILO, [“What has changed for migrant workers in Qatar?”](#), *op.cit.*

34 Equidem investigations conducted in Qatar between 2022 and 2023. Data held on file by Coalition partners.

35 134.256 (Thailand).

36 Qatar, [Law No. \(17\) of 2020](#).

37 ILO, [What has changed for migrant workers in Qatar?](#) *op.cit.*

38 *Ibid.*

39 *Ibid.*

40 Equidem, [If we complain, we are fired](#), *op.cit.*

41 *Ibid.*

42 *Ibid.*; Pete Pattison, Imran Mukhtar, and Praveen Yadav, [“World Cup security guards still jailed in Qatar after dispute over unpaid wages”](#), *The Guardian* (26 May 2023).

43 Equidem, [If we complain, we are fired](#), *op.cit.*

44 *Ibid.*

45 134.32, (Peru).

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47 ILO, ‘A guide to the roles and responsibilities of joint committee representatives in Qatar,’ (1 February 2021).

48 Business and Human Rights Resource Centre, [After the final whistle](#), *op.cit.*

49 *Ibid.*

50 Equidem, [If we complain, we are fired](#), *op.cit.*

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The Guardian (26 May 2023); Mark Critchley, [Qatar’s World Cup, six months on: If ‘now is all’, what comes next?](#) *The Athletic* (18 June 2023); Andrew Mills, [Jailed, deported and backlisted: Qatar’s outspoken World Cup guards](#), *Reuters* (5 May 2023); Sam Wallace, [World Cup migrant workers imprisoned for months in Qatar](#), *The Telegraph* (18 May 2023).

57 Evidence from 2 focus groups with migrant workers in Qatar – primarily migrant domestic workers – between September and November 2023 with workers from India, Ghana, Philippines, Sri Lanka, and Kenya.

58 Evidence from 2 focus groups with migrant workers in Qatar – primarily migrant domestic workers – between September and November 2023 with workers from India, Ghana, Philippines, Sri Lanka, and Kenya. Data held on file by Coalition partners.

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60 Equidem research conducted in Qatar in 2023. Information on file with Coalition partners.

61 ILO, [What has changed for migrant workers in Qatar?](#) *op.cit.*

62 ILO, [One is too many: The collection and analysis of data on occupational injuries in Qatar](#) (November 2021).

63 Equidem, 2022. Additional data on file with Coalition partners.

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