

Key findings

- ➔ Engagement has increased: 11 of 19 brands (58%) participated in this survey compared with seven out of 17 (41%) last time.
- ➔ **IHG** scored the highest and was the only brand to be awarded a three-star rating (out of five). **Louvre** scored the lowest with 11 points (13%), but all brands scored below 50%.
- ➔ Transparency lagged behind other sectors: only four of 19 brands disclosed names of their labour suppliers and recruiters.
- ➔ Workers were not able to freely change jobs despite the landmark reform abolishing the No-Objection Certificate (Kafala system): Almost all workers revealed at least some issues with changing jobs, ranging from not being allowed to break their contract to fear of intimidation and reprisal, including deportation, if they requested transfer.
- ➔ Recruitment remained one of the most serious areas of risk with due diligence processes not fit for purpose:
 - ➔ Only **Hilton** described conducting active due diligence to select recruitment agencies in sending countries that went beyond reviewing legal documentation;
 - ➔ Eight of 18 workers interviewed said they had paid recruitment fees;
 - ➔ Only **Radisson** and **Kempinski** had a policy fully compliant with the Employer Pays Principle;
 - ➔ Only **Hilton** and **IHG** stated they had uncovered instances of worker-paid recruitment fees, but only **IHG** disclosed how many cases of recruitment fees it had uncovered;
 - ➔ Eight brands either did not provide any data or said they had not detected any instances, whilst failing to outline robust mechanisms to safeguard against fee charging.
- ➔ Worker voice is severely suppressed: The majority of responding brands stated they had worker committees or an equivalent mechanism for worker organising in the absence of legally permitted unions. However, workers at the hotels replied universally that no such committees exist.

11/19 hotel brands participated in this survey



4/19 hotel brands disclosed names of their labour suppliers and recruiters



6/11 responding brands provided some information on the number of workers they made redundant due to COVID-19



8/18 workers said they had paid recruitment fees



10/18 workers from Africa or South Asia reported pay and position were dependent on nationality



- ➔ Subcontracted workers had far less favourable terms and conditions, received substantially less pay for the same work and were subject to the most serious abuses, including passport confiscation and delayed wages with illegal deductions.
- ➔ Despite well-known risks in the subcontracted workforce, no brand demonstrated satisfactory due diligence of labour suppliers:
 - ➔ Most brands did not disclose any due diligence steps to monitor the treatment of subcontracted workers and several brands referred to carrying out audits or “reserving the right” to do so despite the well-known failure of audits to detect serious abuse in supply chains;
 - ➔ No brand reported proactively and systematically speaking to subcontracted workers to assess standards despite these workers being present in their hotels.
- ➔ Ten out of 18 workers interviewed from Africa or Asia reported pay and position were dependent on nationality.
- ➔ Most responding brands (six) provided some information on the number of workers they made redundant due to COVID-19, and all outlined steps they took in worker accommodation and at work to safeguard workers against the virus.

These deeply troubling findings illustrate the wide gulf between hotel brands' policies and the worrying experience of workers who lack even the basic freedom to change jobs. Brands must urgently overhaul their approach and ensure the protection of migrant workers by:

- ➔ Putting all **workers at the centre of their due diligence** monitoring processes, including regularly interviewing subcontracted workers about their conditions; consulting with civil society in the region as well as in key sending countries; and establishing meaningful democratic worker committees which include subcontractors and allow workers to bring issues to management without fear of reprisal;
- ➔ Ensuring **workers are free to change jobs** without fear of reprisal by training all workers and subcontractors on their rights under the labour reforms that abolish the No-Objection Certificate (NOC); training all hotel management to ensure they understand their responsibilities to accommodate transfer requests and not impose additional administrative requirements (e.g. resignation letter);
- ➔ **Addressing recruitment fees** by working collaboratively as an industry with key stakeholders in sending countries to establish a fair and transparent recruitment process that ensures workers will not pay fees; systematically carry out interviews with workers at several points in the recruitment process to establish if fees have been paid and requiring subcontractors to do the same; and ensuring fees are repaid to workers and subcontracted workers, if necessary reimbursing subcontracted workers directly.

Please see our full [recommendations](#) at the end of the report.