



# FIFA ACTIVITY UPDATE ON HUMAN RIGHTS

*MAY 2017*

**FIFA®**

## EXECUTIVE SUMMARY

This activity update provides an overview of FIFA's work on human rights one year after FIFA's statutory commitment on human rights came into force in April 2016. Article 3 of the revised FIFA Statutes stipulates that "FIFA is committed to respecting all internationally recognised human rights and shall strive to promote the protection of these rights." This update report is published alongside FIFA's Human Rights Policy, which was adopted by the FIFA Council in May 2017.

This report introduces FIFA's four-pillar human rights approach, which serves as a structuring framework for its human rights work. Each of the four pillars includes two work areas: commit and embed, identify and address, protect and remedy, and engage and communicate. The approach is based on the UN Guiding Principles on Business and Human Rights (UNGPs), which provide an authoritative international framework outlining the human rights responsibilities of international sports entities such as FIFA.

The report goes on to outline key steps that FIFA has taken in each of the eight work areas. It shows that significant progress has been made over the past year in systematising and strengthening FIFA's human rights work in all of these areas. Some of the main achievements are:

- The strengthening and specification of FIFA's human rights commitment, including anchoring human rights in the organisational strategy 'FIFA 2.0' and the development and approval of FIFA's Human Rights Policy;
- The embedding of respect for human rights within the organisation through clarifying and defining roles and responsibilities, increasing capacity among FIFA staff and enhancing cross-departmental collaboration;
- The strengthening of FIFA's work on anti-discrimination through the further development and fine-tuning of the Anti-Discrimination Monitoring System to identify and sanction discriminatory incidents in stadiums;
- The enhancement of monitoring and enforcement mechanisms regarding labour rights on stadium construction sites for the 2018 and 2022 FIFA World Cups in Russia and Qatar and the collaboration with the Building and Woodworkers' International (BWI) in relation to these efforts; and
- The broadening of engagement with football stakeholders, including with the international union of professional football players FIFPro, towards enhancing the protection of players' rights; and
- The creation of and collaboration with the Human Rights Advisory Board, comprised of experts from the UN System, trade unions, civil society and FIFA sponsors.

At the same time, this update report also shows that continued and enhanced efforts are required for FIFA to implement its statutory human rights commitment in accordance with the UNGPs. This is also reflected in the overview of the current status of implementation of the recommendations developed by Professor John Ruggie in his independent March 2016 "FIFA and Human Rights" report that FIFA commissioned (see annex).

FIFA is committed to continuing its efforts to implement its human rights responsibilities. As such, it looks forward to continued engagement with its various external stakeholders on that journey.

## TABLE OF CONTENTS

	Page
Executive summary	2
Table of contents	3
1. Introduction	4
2. FIFA's human rights approach	6
3. Overview of FIFA's human rights-related activities	8
3.1. Pillar I: Commit and embed	8
3.2. Pillar II: Identify and address	10
3.3. Pillar III: Protect and remedy	16
3.4. Pillar IV: Engage and communicate	17
4. Conclusion and outlook	19
Annexe: Implementation status of recommendations developed by Professor John Ruggie	20

## 1. INTRODUCTION

FIFA is the governing body of the world's most popular sport and touches the lives of millions of people. With such great impact comes the responsibility to preserve the dignity and equal rights of everyone affected by FIFA's activities. FIFA sees its responsibility to respect human rights as a baseline for all of these activities and included a commitment to respect and protect human rights in the revised FIFA Statutes, approved by the Extraordinary FIFA Congress in February 2016.

This update report on human rights provides insights into FIFA's activities in regard to implementing its responsibility to respect human rights. It focuses on the measures that have been taken since April 2016, when FIFA's statutory human rights commitment came into force.

This introductory section provides background information, specifies FIFA's statutory human rights commitment, and outlines the objectives and structure of this update report.

### Background

FIFA has implemented targeted human rights-related measures well before this statutory commitment came into force as part of the development and gradual expansion of FIFA's sustainability programmes since the 1990s.

In 1997, for instance, FIFA established a due diligence process to combat child labour in the football production industry in collaboration with the International Labour Organization (ILO). It has also integrated the Code of Conduct of the World Federation of the Sporting Goods Industry (WFSGI) in procurement processes for FIFA-licensed products. Moreover, FIFA established the Football for Hope programme in 2005, through which it supports a wide range of NGOs that tackle social issues in their communities through football and contribute to the protection and promotion of human rights.

Furthermore, since 2010 FIFA has included a series of human rights-related measures in its sustainability strategies and action plans for the 2014 and 2018 FIFA World Cups™ in Brazil and Russia. These measures include work on labour rights issues, fighting discrimination in football as well as ensuring sustainable procurement and the accessibility of stadiums for disabled people. Moreover, FIFA has been engaging closely with the Supreme Committee for Delivery and Legacy in Qatar as it set out to develop its systems to ensure decent working conditions on stadium construction sites after being awarded the 2022 FIFA World Cup™ in 2010. In addition, since 2013 FIFA has been developing a strategic programme to promote a discrimination-free environment in world football and, in March 2013, lifted a ban on head covers, effectively allowing women to play football with a hijab.

In recent years, FIFA has increasingly faced criticism in relation to human rights. Much of this criticism is focused on the human rights risks related to the 2018 and 2022 FIFA World Cups in Russia and Qatar. But it also included discussions around the protection of players' rights and the problem of discrimination in football.

### FIFA's human rights commitment

It is against this backdrop that, in February 2016, the Extraordinary FIFA Congress adopted the revised FIFA Statutes, which include an unequivocal commitment to human rights. Article 3 of the [FIFA Statutes](#) now states that:

“FIFA is committed to respecting all internationally recognised human rights and shall strive to promote the protection of these rights.”

The inclusion of this statutory human rights commitment marked a paradigm shift for FIFA's work on human rights, as measures to address adverse human rights impacts

had previously generally been taken on an ad hoc basis. When the revised FIFA Statutes came into force in April 2016, the commitment to respect human rights became an important organisational principle, which the FIFA administration is now bound to implement across the organisation's activities.

FIFA is committed to implementing its human rights responsibilities in line with the UN Guiding Principles on Business and Human Rights (UNGPs). This is reflected in [FIFA's Human Rights Policy](#), which is being published alongside this update report. The Human Rights Policy includes a personal commitment to human rights from the FIFA President and the FIFA Secretary General, an explanation of how FIFA understands its human rights responsibilities, a description of the key risk areas identified, and an overview of the approach for implementing its human rights commitment.

### **Objectives and structure of this update report**

This update report aims to provide FIFA's stakeholders and the wider public with an account of where FIFA currently stands in terms of implementing its statutory human rights commitment one year after its revised Statutes came into force. The intention is

for it to be read in conjunction with FIFA's new Human Rights Policy. While the Human Rights Policy describes FIFA's human rights commitment in general terms, this report provides insights into specific measures that FIFA has taken to date to implement this commitment. It also assesses the progress that has been made in light of the 25 recommendations presented by Professor John Ruggie in his March 2016 ["FIFA and Human Rights"](#) report.

While this update report draws on the UN Guiding Principles Reporting Framework developed by Shift and Mazars, it is important to note that it is not a full human rights report from the perspective of this reporting standard. FIFA will, however, develop a full human rights report in line with relevant international reporting standards in 2018.

This report is structured as follows: section 2 presents FIFA's human rights approach as the framework through which the organisation implements its human rights commitment. Section 3 outlines measures taken in the four pillars and eight work areas that are part of this approach and section 4 provides some concluding remarks and a brief outlook. In the annexe, an overview on the current implementation status of the recommendations outlined in Professor John Ruggie's report is provided.

## 2. FIFA'S HUMAN RIGHTS APPROACH

In 2016, FIFA developed a general framework to structure and guide the implementation of its human rights responsibilities and commitment. This human rights approach helps FIFA to operationalise its strategic human rights commitment by outlining clearly defined operational work areas.

FIFA's human rights approach is anchored in the UNGPs. It covers the responsibilities under the UNGPs to commit to respect human rights and to embed this commitment in the organisational structures and culture, to conduct ongoing and in-depth human rights due diligence, and to provide for or cooperate in remediation. Furthermore, the approach takes into account the responsibility to engage closely with external stakeholders and puts emphasis on FIFA's role in helping to protect the freedoms of human rights defenders and media representatives covering FIFA's events and activities.

communicating the policy both internally and externally.

- The work area *embed* covers FIFA's efforts to reflect its human rights commitment in operational internal procedures, to institutionalise cross-departmental collaboration on the issue and to build capacity among relevant staff.

### Pillar II: Identify and address

- The steps to *identify* adverse human rights impacts include a regularly updated organisation-wide analysis to identify the most salient human rights risks for FIFA, which are those by which FIFA, through its own activities or business relationships, risks involvement in the most severe adverse human rights impacts. It furthermore includes more detailed assessments to identify and understand in detail the nature of specific risk areas.
- As part of the work area *address*, FIFA develops and implements appropriate measures to prevent and mitigate adverse human rights impacts, with a particular emphasis on the priority areas identified as FIFA's most salient human rights risks. This includes using and, where necessary increasing, its leverage with third parties where FIFA may be involved in adverse human rights impacts through its business relationships.

FIFA'S HUMAN RIGHTS APPROACH			
<b>Pillar 1</b> Commit and embed	<b>Pillar 2</b> Identify and address	<b>Pillar 3</b> Protect and remedy	<b>Pillar 4</b> Engage and communicate

Figure 1: FIFA's Human Rights Approach

FIFA's human rights approach rests on four pillars and includes eight work areas:

### Pillar I: Commit and embed

- FIFA's efforts to *commit* to upholding its human rights responsibilities include the development of a specific Human Rights Policy, the integration of this commitment into the organisation's key strategic and regulatory documents, and proactively

### Pillar III: Protect and remedy

- The work area *protect* focuses on FIFA's efforts to help protect the freedoms of human rights defenders and media representatives in their work related to FIFA's events and activities. This includes publicly committing to respecting and not interfering with the work of human rights defenders and media

representatives, and taking appropriate measures for their protection where their freedoms are at risk.

- FIFA's work on *remedy* includes its efforts to provide for or cooperate in remediation where it has caused or contributed to adverse human rights impacts by as well as activities to promote or cooperate in access to remediation where it is otherwise linked to adverse impacts through its relationships with third parties. FIFA thereby considers appropriate internal and external as well as local and international mechanisms.

#### **Pillar IV: Engage and communicate**

- Under the work area *engage*, FIFA develops structured and regular exchanges on its human rights-related work with its external stakeholders, including those affected by FIFA's operations and their legitimate representatives, and also engages with stakeholders in specialised platforms.
- In terms of the work area *communicate*, FIFA ensures regular and public reporting on its human rights-related efforts and proactive public communication on important developments and events.

### 3. OVERVIEW OF FIFA'S HUMAN RIGHTS-RELATED ACTIVITIES

This section provides an overview of FIFA's activities in each of the eight work areas of its human rights approach. It is important to note that the following is not a comprehensive description of all of FIFA's human rights-related activities. It highlights key areas of work and focuses on the steps that have been taken in the year since FIFA's statutory human rights commitment came into force in April 2016.

#### 3.1. Pillar I: Commit and embed

Throughout the past year, FIFA has put a great deal of emphasis on activities in the work areas of commit and embed under pillar I. This has been key to systematising FIFA's work on human rights and aligning it with the UNGPs, and it also serves as the basis for the activities under the other pillars.

#### **Commit: Strategy Human Rights Policy and internal regulations**

After enshrining its fundamental human rights commitment in its Statutes, FIFA has taken a series of additional measures to specify its commitment and integrate it into key strategic and regulatory documents.

In October 2016, FIFA's statutory human rights commitment was further explained in the organisation's new strategy "[FIFA 2.0: The Vision for the Future](#)". The document anchors human rights as an important component of FIFA's organisational renewal. In particular, chapter 6 of the strategy outlines FIFA's ambition to "champion human rights." It maintains that "(t)he breadth and impact of FIFA's global operations create a duty to preserve the inherent dignity and equal rights of each and every individual affected by the organisation's activities" and that "FIFA upholds the respect for human rights and the application of international standards of behaviour as a principle and as part of all its activities."

To further strengthen and specify its statutory and strategic human rights commitments,

FIFA has also developed a dedicated [Human Rights Policy](#), which was adopted by the FIFA Council at its May 2017 meeting and is published alongside this update report. The policy follows guidance from UNGP guiding principle 16 and is structured in three parts. It first outlines a personal commitment to human rights by the FIFA President and the FIFA Secretary General. The second part specifies FIFA's human rights commitment in accordance with the UNGPs and outlines some of FIFA's most salient human rights issues and specific commitments. The third part provides an overview of FIFA's human rights approach and discusses FIFA's priorities in each of the eight work areas. The Human Rights Policy includes input from a wide range of internal and external stakeholders, including human rights experts from the UN system, civil society, trade unions, academia, and FIFA sponsors.

At the same time, FIFA is in the process of assessing its key internal codes and regulations in light of the new human rights commitment enshrined in article 3 of its Statutes.

#### **Embed: internal responsibilities, capacity-building, collaboration and Human Rights Advisory Board**

Over the past year, FIFA has further defined and clarified its internal roles and responsibilities related to the implementation of its human rights commitment. As a statutory provision, the commitment is binding upon all FIFA bodies and officials when they are exercising their respective powers and competences. The specific responsibilities are separated between the strategic and the operational arms of the organisation.

At the strategic level, the FIFA Council is responsible for the overall strategic direction of the organisation. It adopts and decides on amendments to FIFA regulations, with the exception of the FIFA Statutes which fall under the responsibility of the FIFA Congress. Furthermore, the FIFA Governance Committee provides strategic guidance to the FIFA Council



on human rights issues. The Governance Committee, which was formed in 2016, has created their own internal Human Rights Working Group. Its members take a leading role in the committee's work on human rights and engage directly with the relevant FIFA departments with regard to the strategic aspects of the organisation's human rights work.

Operationally, the overall responsibility for the implementation of FIFA's statutory human rights commitment lies with the FIFA Secretary General, who heads up the FIFA administration. Responsibility for ensuring the day-to-day management of FIFA's human rights work rests with the Head of the Sustainability & Diversity Department, who reports directly to the FIFA Secretary General and who receives, and coordinates with the competent FIFA divisions or bodies, any enquiries regarding human rights.

FIFA has also significantly enhanced its internal capacity on the topic of human rights. In September 2016, FIFA hired a Human Rights Manager to work within the Sustainability & Diversity Department. This Human Rights Manager leads the day-to-day planning, coordination and implementation of FIFA's work on human rights and liaises closely with representatives from other FIFA departments. Moreover, since late 2016, the Sustainability & Diversity Department has been engaging in dedicated efforts to sensitise other relevant departments and support their human rights-related activities. As a platform for cross-departmental collaboration, the Sustainability & Diversity Department holds regular cross-departmental meetings on human rights, to which around a dozen different divisions and departments are invited. These include, for instance, those responsible for member associations, compliance, legal affairs, football development, public affairs, security, competitions, players' status, retail and merchandising, and human resources.

FIFA's efforts to embed respect for human rights throughout the organisation are

supported by its independent Human Rights Advisory Board. The advisory board includes experts from the UN System, trade unions, civil society organisations and FIFA sponsors (see below). The advisory board has a mandate to advise FIFA on any aspect that the board members consider relevant for the implementation of FIFA's human rights commitment. The advisory board holds at least two in-person meetings per year and issues public recommendations to FIFA on a biannual basis. It held its [first meeting](#) on 13-14 March 2017.

#### **BOX 1: MEMBERS OF FIFA'S HUMAN RIGHTS ADVISORY BOARD**

The following eight experts on business and human rights are members of FIFA's Human Rights Advisory Board (in alphabetical order):

- William Anderson (adidas)
- Rachel Davis (Shift, current chairperson of the Board)
- Ignacio Packer (Terre des Hommes)
- Sylvia Schenk (Transparency International Germany)
- Theo van Seggelen (FIFPro)
- Lene Wendland (Office of the UN High Commissioner for Human Rights)
- Brent Wilton (The Coca-Cola Company)
- Ambet Yuson (Building and Woodworkers' International)

The independent members of the advisory board act in their professional capacity and do not receive any financial or other compensation for the time invested. The mandate and working methods of the advisory board are outlined in the [terms of reference](#), which are publicly available.

### 3.2. Pillar II: Identify and address

As outlined in the introductory part of this report, FIFA took significant steps to identify and address adverse human rights impacts long before the statutory human rights commitment came into force in April 2016. Over the past year, FIFA has engaged in dedicated efforts to systematise and strengthen this work towards developing an ongoing due diligence process in line with the UNGPs.

#### **Identify: assessment and prioritisation of human rights issues**

In late 2016, FIFA launched an internal process to identify its most salient human rights issues. This process is the basis for FIFA's systematic approach to respecting and promoting human rights. The identification of these priority areas involved in-depth and repeated consultations with a wide array of internal

stakeholders. Furthermore, the provisional list of salient human rights issues was discussed with FIFA's Human Rights Advisory Board at its first meeting in March 2017. FIFA will regularly review the selection of salient human rights issues based on consultations with internal and external stakeholders.

Following guidance from the UNGP Reporting Framework, FIFA considers its salient human rights issues to be the human rights at risk of the most severe negative impacts by FIFA through its own activities or business relationships. FIFA has identified what it currently considers the ten most salient human rights issues and had grouped them in three categories: issues related to events, issues related to football governance, and issues related to FIFA's in-house operations (see Box 2 below). The selection of these ten most salient human rights issues is a structuring element for FIFA's human rights due diligence processes.

#### **BOX 2: FIFA'S MOST SALIENT HUMAN RIGHTS ISSUES**

FIFA's salient human rights issues can be grouped in three categories:

##### **Category 1: Issues related to events**

- 1a. Construction of event-related infrastructure
- 1b. Event-related supply chains
- 1c. Recruitment and working conditions of local staff and volunteers
- 1d. Provision of safety and security
- 1e. Discrimination linked to events

##### **Category 2: Issues related to football governance**

- 2a. Employment and transfer of players
- 2b. Activities of member associations

##### **Category 3: Issues related to in-house operations**

- 3a. Recruitment and working conditions of FIFA staff
- 3b. Procurement of goods and services at FIFA headquarters
- 3c. Licensee supply chains

### **Address: prevent and mitigate adverse human rights impacts**

Since April 2016, FIFA has been continually stepping up its efforts to prevent and mitigate involvement in adverse human rights impacts. FIFA is currently in the process of evaluating all related measures, with a focus on the ten most salient human rights issues outlined above. Based on these assessments, FIFA is engaging in the development of action plans in order to address any identified gaps starting in the second half of 2017.

This update report does not provide a description of all of FIFA's activities to address human rights risks. The objective, however, is to provide an overview and to highlight some of the key activities in each of the three categories of salient human rights risks with a focus on the steps that have been taken since FIFA's statutory human rights commitment came into force in April 2016.

### **a) Issues related to events**

Of the ten most salient human rights issues, five are related to FIFA's events. They include adverse human rights impacts linked to the construction of infrastructure, supply chains, recruitment and working conditions of local staff and volunteers, the provision of safety and security, and discrimination. Over the past year, FIFA has strengthened its work to address adverse human rights impacts in relation to all of these issues.

The severity of specific event-related salient issues differs between the various events organised by FIFA. The kind and scope of activities to address issues for each of the events depends on the risks involved as well as on the phase of the event organisation at a given point in time. Over the past year, FIFA's efforts to address human rights issues related to its events have focused on the upcoming FIFA Confederations Cup 2017 and the 2018

### **BOX 3: ENSURING DECENT WORKING CONDITIONS ON CONSTRUCTION SITES FOR THE 2018 FIFA WORLD CUP IN RUSSIA**

In Russia, FIFA and the Local Organising Committee (LOC) have developed a [Decent Work Monitoring System](#) in collaboration with a Russian expert institution, the Klinsky Institute of Labour Protection and Working Conditions. Klinsky inspects all stadium construction sites in two-day on-site inspections on a quarterly basis and reports any inconsistencies to the companies as well as to FIFA and the LOC. If any such inconsistencies involve risks to the health and safety of workers, they are escalated within FIFA and the LOC as well as with relevant Russian law enforcement authorities. In 2016, a total of 39 inspections were carried out and the programme has continued at the same pace throughout 2017, with 20 additional inspections carried out until May 2017.

In order to further strengthen the mechanisms in place, FIFA and the LOC signed a Memorandum of Understanding (MoU) with the Building and Woodworkers' International (BWI) and the Russian Construction Workers Union (RBWU) in August 2016. The MoU includes collaboration on joint inspections, the facilitation of negotiations to address workers' complaints, and support from the trade unions in the finalisation of the inspection methodology. By April 2017, the BWI and/or the RBWU had accompanied 14 inspections under the 2018 FIFA World Cup Decent Work Monitoring System.

FIFA World Cup in Russia, the preparations for the 2022 FIFA World Cup in Qatar, and the integration of human rights criteria into the bidding and hosting process of future FIFA tournaments, including the 2026 FIFA World Cup.

*FIFA Confederations Cup 2017 and 2018 FIFA World Cup in Russia*

Over the past year, FIFA has stepped up its activities on all of the salient human rights risks related to the FIFA Confederations Cup 2017 and the 2018 FIFA World Cup in Russia as part of the implementation of the respective, dedicated Sustainability Strategy and Action Plan for the events in Russia. The action plan includes 155 actions, many of which are

human rights-related. This work is primarily carried out by members of the eight-person joint FIFA/LOC Sustainability team in Moscow with support from the FIFA Sustainability & Diversity Department in Zurich.

Over the past year, a key priority of this work has been the development and implementation of the Decent Work Monitoring System (see box 3, page 11). FIFA thereby works with an independent expert institution, the Klinsky Institute of Labour Protection and Working Conditions, which conducts quarterly inspection visits at each of the stadium construction sites. Based on a methodology that was developed specifically for this purpose, the inspection team carries out quarterly two-day visits to every stadium construction site. The inspections are regularly accompanied by representatives of the international trade union Building and Woodworkers' International (BWI) and the Russian Construction Workers Union (RBWU), with which FIFA and the LOC signed a Memorandum of Understanding in August 2016.

A second focus lies on activities related to anti-discrimination. These include the implementation of the Anti-Discrimination Monitoring System (see Box 4 left) to identify and sanction discriminatory incidents in the stadiums, as well as anti-discrimination training sessions with relevant FIFA and LOC staff, match commissioners, stewards, volunteers as well as food & beverage staff. Furthermore, FIFA will run a series of sensitisation campaigns on anti-discrimination linked to the events in Russia.

Among the other human rights-related activities implemented as part of the Sustainability Strategy for the 2018 FIFA World Cup in Russia are the development of internal procedures and training sessions to ensure decent working conditions for local staff and volunteers, the integration of sustainability criteria in the procurement processes for the tournaments, the development and

**BOX 4: ENSURING DECENT WORKING CONDITIONS ON CONSTRUCTION SITES FOR THE 2022 FIFA WORLD CUP IN QATAR**

In Qatar, FIFA is collaborating closely with the Supreme Committee for Delivery and Legacy (SC), which is responsible for delivering the infrastructure for the 2022 FIFA World Cup (FWC). At the SC, more than a dozen local and international experts are working on the protection of labour rights and occupational health & safety. The SC has developed a comprehensive set of Workers' Welfare Standards (WWS) based on international standards. The WWS are an integral part of the tendering process and are contractually binding for all companies working on FWC construction sites. The implementation of the standards is monitored by a four-tier monitoring system, including self-assessments by the contractors, audits by the SC, audits by an independent third-party (the British company Impactt Ltd.), and audits by the Qatari Ministry of Labour. In April 2017, Impactt Ltd. published its first [public report](#) based on inspections carried out in August and November 2016 and in January 2017.

In November 2016, the SC signed a [Memorandum of Understanding](#) with the Building and Woodworkers' International (BWI). The collaboration between the two entities includes joint inspections on 2022 FWC stadium sites, training of staff from SC and contractors, as well as an assessment of the SC's grievance mechanisms. The first two joint inspections were held in February and April 2017.

implementation of a tobacco-free event policy, and an extensive programme to facilitate access to the stadiums and related events for disabled people.

#### *2022 FIFA World Cup in Qatar*

In relation to the 2022 FIFA World Cup in Qatar, FIFA has been in close collaboration with the Supreme Committee for Delivery and Legacy (Supreme Committee) ever since its establishment in 2011. The Supreme Committee is responsible for delivering FIFA World Cup infrastructure. The focus of this collaboration is on the monitoring and enforcement mechanisms that were put in place to ensure decent working and living conditions for people working on 2022 FIFA World Cup stadium construction sites (see Box 4, page 12). At the Supreme Committee, more than a dozen local and international experts are working on issues related to workers' welfare and health and safety.

In April 2017, the Qatar 2022 Local Organising Committee hired a Sustainability Senior Manager who is responsible for leading the development and implementation of the 2022 FIFA World Cup Sustainability Policy and Strategy. Drawing on FIFA's new Human Rights Policy, this work will include a wide range of human rights-related measures. In developing the policy and the strategy, input from external stakeholders will be sought.

#### *Other FIFA tournaments*

At its meeting in May 2017, the FIFA Council decided to integrate human rights requirements in the bidding process for the 2026 FIFA World Cup. Over the past year, FIFA has also strengthened its engagement on human rights related to other FIFA tournaments. This included, for instance, close engagement with the host country of the FIFA U-20 Women's World Cup Papua New Guinea 2016 and the implementation of a [joint campaign with UNICEF](#) to help combat violence against women and children in the

#### **BOX 5: INTEGRATION OF HUMAN RIGHTS IN THE SELECTION OF HOST(S) FOR THE 2026 FIFA WORLD CUP**

The integration of human rights into the bidding and hosting processes of the 2026 FIFA World Cup is based on the UNGPs. Key elements include a requirement for bidders and the selected host country or countries to make a public commitment to respect internationally recognised human rights in line with the UNGPs in all aspects of their activities relating to the hosting and staging of the competition and to provide a human rights strategy and concept, including a detailed risk assessment and strategy to address potential adverse human rights impacts. An initial assessment and strategy proposal will have to be provided by the bidders as part of the bidding process. Human rights criteria and the information provided by the bidders will then be an integral part of the bid evaluation by the FIFA administration. Once the host(s) has/have been selected, relevant entities tasked with staging the event will be required to put an in-depth human rights due diligence process in place and to cooperate closely with FIFA in that regard.

country. FIFA is also in close contact with the team responsible for sustainability at the FIFA U-17 World Cup India 2017. Furthermore, FIFA has started to integrate human rights into the bidding process for such tournaments.

#### *Bidding process and hosting of future FIFA tournaments*

Over the past two years, FIFA has developed a detailed concept on the integration of human rights aspects in the organisation of its events, including the bidding phase as well as during the preparation and hosting of the event itself. FIFA has already sought technical guidance and assistance from the Office of the United Nations High Commissioner for Human Rights (OHCHR) as part of a stakeholder consultation process. The detailed concept will be discussed with the Human Rights Advisory Board and additional external stakeholders in May, June and July 2017 (see Box 5 above).

At the same time, FIFA has started to integrate human rights considerations into the bidding requirements for other FIFA tournaments.

Since April 2016, FIFA has been assessing the bids for the FIFA Futsal World Cup 2020 based on human rights criteria.

**b) Issues related to football governance**

FIFA has a responsibility to address adverse human rights impacts that it may be involved in through its role in football governance. FIFA has identified the potential involvement of

**BOX 6: ANTI-DISCRIMINATION MONITORING SYSTEM**

A central part of FIFA's work on anti-discrimination is the FIFA Anti-Discrimination Monitoring System, which was launched in May 2015 and has been operating in full swing since mid-2016. FIFA is implementing the monitoring system in collaboration with FARE, an NGO network working to combat racism and discrimination in football. As part of the monitoring system, independent observers are present at all matches identified as involving heightened risks of discriminatory incidents. The observers report on any discriminatory incidents, and these reports then serve as a basis for FIFA-internal disciplinary procedures and potential sanctions of member associations by FIFA. The system is being implemented for the 2018 FIFA World Cup qualifiers and has led to a series of sanctions in recent months.

member associations in adverse human rights impacts and the protection of players' rights as salient human rights issues in this regard. In both of these areas, FIFA has stepped up its efforts since its statutory human rights commitment came into force in April 2016.

Concerning the activities of member associations, FIFA has, for instance, included human rights-related considerations in the regulations of the new Forward Programme,

through which FIFA supports the football development activities and projects of member associations. In addition, over the past few years, FIFA has developed a [strategic approach](#) to strengthening the work of member associations in terms of anti-discrimination. Article 4 of the FIFA Statutes clearly condemns all kinds of discriminatory practices. In striving for a discrimination-free environment in football, FIFA follows a strategic approach comprising five intersecting elements: regulations, controls and sanctions, communications, education and networking, and cooperation. The implementation of this strategy is led by FIFA's Anti-Discrimination Manager and involves close collaboration between several departments at FIFA, as well as with member associations and external stakeholders (see Box 6 left).

In the new Human Rights Policy, FIFA has pledged to embed human rights throughout its relationships with third parties, which includes broadening its proactive work with member associations on human rights areas beyond its work on anti-discrimination. FIFA will further discuss and expand such activities as part of the action plan development to address human rights risks related to member associations' activities starting in the second half of 2017.

The second salient human rights issue related to football governance is the rights of players. As the governing body of world football, FIFA sets rules in terms of the status and transfer of players. Contractual employment-related disputes between a club and a player of an international dimension can be brought to the FIFA Dispute Resolution Chamber (DRC). Appeals against DRC decisions can be lodged with the Court of Arbitration for Sport (CAS) in Lausanne, Switzerland. Moreover, FIFA has established the transfer matching system (TMS), a platform that systematises, records and monitors international player transfers between clubs, and consequently increases the transparency of individual transactions.

**BOX 7: PROTECTION OF MINORS**

Young footballers are vulnerable to potential exploitation and abuse when they are in a foreign country without proper controls. FIFA therefore works hard to protect the rights of players younger than 18 – whether male or female, amateur or professional. This is primarily done through the enforcement of regulations prohibiting the international transfer of a minor, or the first registration of a minor in a country of which he/she is not a national, except in specific and verifiable circumstances. An international transfer of a minor player cannot take place unless one of the exceptions outlined in article 19 paragraph 2 of the FIFA Regulations on the Status and Transfer of Players or the so-called “five-year rule” (cf. art. 19 paras 3 and 4 of the mentioned regulations; pg. 22-23) apply. Equally, subject to certain strict prerequisites being met, refugee players or exchange students may, on limited occasions and with extreme reservation, be authorised to transfer internationally. The sub-committee of the FIFA Players’ Status Committee is charged with reviewing applications for these cases, taking into consideration the specific circumstances of each individual case while recognising the opportunities for integration that football certainly offers. The practical application of the relevant provisions of the regulations on the protection of minors by the relevant deciding body on a case-by-case basis and within the aforementioned exhaustive scope, combined with the administrative procedure in place for the submission of minor applications via TMS, allows FIFA to prevent the discrimination and unfair treatment of (foreign) minor players and ultimately to protect the youngest participants in the game.

All of these instruments help FIFA to address human rights risks related to players. For instance, the Regulations on the Status and Transfer of Players stipulate that clubs are required to comply with their financial obligations towards players and other clubs as per the terms of the contracts with their professional players and the transfer agreements. Over the past two years, FIFA has eased the resolution of such disputes by introducing “fast-track” proceedings for overdue payable claims. Moreover, the regulations aim to protect young players by prohibiting the international transfer of a minor, or the first registration of a minor in a country of which he/she is not a national, except in specific and verifiable circumstances (see Box 7 left). In March 2017, FIFA took

**BOX 8: WFSGI AND PLEDGE FOR THE FIFA QUALITY PROGRAMME**

Each company that wishes to sign a FIFA licence agreement and become part of the FIFA Quality Programme must, together with their manufacturer, sign a pledge form confirming that they are both in compliance with all of the principles set forth in the WFSGI Code of Conduct. In order to verify this, the FIFA licensee has to provide the WFSGI with an audit report proving its supplier’s full compliance with the [WFSGI Code of Conduct](#). The audit report must cover all of the provisions stipulated in the Code of Conduct and must be issued by an internationally recognised third-party auditing company. A separate pledge is required for each location at which FIFA-certified products are manufactured, and every FIFA licensee must renew each pledge annually. If the company fails to provide the WFSGI with the required documentation in due time, or if the supplier is not in compliance with the WFSGI Code of Conduct, FIFA reserves the right to withdraw its licence (for more information, see [here](#)).

additional measures to lower the barriers for migrants to register with a club in a country to which they have fled for humanitarian reasons.

Other steps taken since April 2016 to enhance the protection of players' rights include the implementation of measures to further protect confidentiality and prevent any misuse of the data available in TMS, the establishment of a pilot project for the implementation and development of national dispute resolution chambers, and a significantly increased engagement with relevant stakeholders, in particular with organisations representing the interests of professional footballers.

### ***c) Issues related to in-house operations***

The third category of salient human rights issues covers topics related to FIFA's in-house operations, which include the recruitment and working conditions of FIFA staff as well as adverse human rights impacts in FIFA's supply chains as part of procurement and licensee relationships.

Concerning the recruitment and employment of staff, FIFA is bound by and complies with Swiss labour law. Moreover, the FIFA Code of Conduct that is applicable to all FIFA employees includes a series of human rights-related considerations. FIFA staff members are, for instance, bound to uphold the principle of protecting the personal dignity, privacy and personal rights of every human being, as well as the principle of zero tolerance of discrimination and harassment of any kind (see FIFA Code of Conduct, principles 3.2 and 3.3). In the past year, FIFA has appointed two external ombudspersons who can be consulted by FIFA staff to raise workplace issues such as workplace bullying, discrimination, sexual harassment or other unfair treatment.

Over the past few years, FIFA has increasingly included human rights-related clauses

in contracts with suppliers and licensees. FIFA is currently engaged in an effort to standardise these clauses based on the type of relationship and the human rights risks involved and to align them with the UNGPs. One area in which FIFA has taken particularly far-reaching measures to ensure compliance with human rights standards is the production of FIFA-licensed footballs and artificial turf. In this area, FIFA, as part of the FIFA Quality Programme, is collaborating with the World Federation of the Sporting Goods Industry (WFSGI) to monitor and enforce respect for human rights in the supply chain (see Box 8).

### **3.3 Pillar III: Protect and remedy**

Pillar III includes the work areas of protecting the freedoms of human rights defenders and media representatives, and of providing for or cooperating in access to remediation. While FIFA has in the past taken a number of steps in these areas, it is still in the relatively early phases of developing a strategic approach in this regard.

#### **Protect: help ensure freedoms of human rights defenders and media representatives**

FIFA is committed to helping to protect the rights of human rights defenders who voice concerns about adverse human rights impacts relating to FIFA and media representatives covering FIFA's events and activities. FIFA respects and does not interfere with the work of human rights defenders and media representatives, and will also take appropriate measures if and when their freedoms – in relation to FIFA activities – are jeopardised.

Over the past year, FIFA has addressed a small number of incidents of this kind through reactive measures. FIFA is currently discussing adequate instruments to strengthen its existing procedures in this regard and will seek advice from external stakeholders.



### **Remedy: targeted mechanisms**

In accordance with the UNGPs, FIFA is committed to providing for or cooperating in remediation where it has caused or contributed to adverse human rights impacts. In addition, FIFA seeks to promote access to remediation where it is involved in adverse impacts through its relationships with third parties. Regarding the provision of complaints procedures for adverse impacts that FIFA may be causing or contributing to, in 2016 the FIFA administration took a number of steps to increase grievance mechanisms for its own staff, including the collaboration with two external ombudspersons (see above, page 16). Moreover, FIFA provides professional football players with access to remediation through its alternative dispute resolution system on the status and transfer of players (see above, page 14).

With regard to the promotion of grievance mechanisms to remedy adverse impacts that FIFA may be involved in through its relationships with third parties, FIFA has taken measures both in regard to adverse impacts linked to its member associations and to the organisation of events. Regarding member associations, FIFA has engaged in dedicated efforts to promote the development of national dispute resolution chambers for football-related matters, including the launch of four pilots in different confederations.

With regard to the organisation of events, FIFA is committed, in accordance with its Human Rights Policy, to developing competent and independent structures for reviewing human rights issues and complaints in the context of its tournaments. In Russia, since April 2017, this work has focused on the situation of workers involved in the construction of the stadiums. FIFA is thereby collaborating with the international trade union Building and Woodworkers' International (BWI) and the Russian Construction Workers Union (RBWU) to facilitate mechanisms through which workers

can address their grievances. In Qatar, the Supreme Committee for Delivery and Legacy has significantly stepped up its work in this regard by strengthening the Workers' Welfare Forums which provide a framework for workers' complaints to be voiced.

In line with its commitment in the Human Rights Policy, FIFA will significantly step up its efforts in regards to access to remedy. It will for instance include respective mechanisms in the Sustainability Strategy for the 2022 FIFA World Cup in Qatar and require future hosts to fulfil their responsibilities to provide for effective remedy.

### **3.4 Pillar IV: Engage and communicate**

Since April 2016, FIFA has significantly enhanced its efforts to engage with its stakeholders and increase transparency by communicating more about its human rights work. This ongoing exchange with its stakeholders allows FIFA to improve its systems based on the demands and expertise of its stakeholders, while communication to the wider public increases FIFA's accountability.

#### **Engage: Consultations and participation in debates**

FIFA's efforts to implement its statutory human rights commitment in accordance with the UNGPs have been supported through an ongoing engagement with its stakeholders. Most importantly, FIFA engages on a regular basis with the Human Rights Advisory Board that has the mandate to advise FIFA on any issue its members consider relevant (see Box 1).

In addition to the collaboration with the Human Rights Advisory Board, FIFA regularly consults specific documents and exchanges with a broad range of stakeholders from international organisations, civil society, trade unions and FIFA sponsors. Over the past year, this has included written consultations on FIFA's Human Rights Policy

and the terms of reference of the Human Rights Advisory Board. Moreover, FIFA is engaged in a continuous and structured exchange on human rights with a group of FIFA sponsors.

Besides these engagements with stakeholders, FIFA participates in international discussions on human rights in sports. It engages with the multi-stakeholder initiative on human rights and mega-sporting events (MSE Platform) led by the London-based organisation Institute for Human Rights and Business, and supported by the governments of Switzerland and the USA. FIFA also regularly organises conferences on human rights-related issues, the most recent one being the recent one being the third edition of the [International Conference for Equality and Inclusion in Football](#) that took place in March 2017 and focused on various forms of discrimination.

### **Communicate: reporting, media relations, public discussions**

FIFA is working to transparently communicate about its human rights-related efforts in line with the UNGPs. The yearly FIFA activity report includes a section on sustainability, which also covers human rights. Moreover, FIFA produces event-specific sustainability reports after each FIFA World Cup. Starting in 2018, FIFA is also planning to publish regular human rights reports that follow guidance from the UNGP Reporting Framework.

In addition, FIFA publishes regular media releases on important developments in the field of human rights, and various factsheets on human rights-related efforts are available on FIFA's website. Furthermore, FIFA representatives frequently share additional insights in public discussions on human rights in sports hosted by academic institutions, international organisations and civil society organisations.

## 4. CONCLUSION AND OUTLOOK

This activity update provides an overview of FIFA's work on human rights. It focuses on the steps that have been taken in the year since FIFA's statutory human rights commitment came into force in April 2016. While significant progress has already been made, the assessment of the measures taken in light of the recommendations outlined by Professor John Ruggie in his March 2016 "FIFA and Human Rights" report (see annex) show that continued and enhanced efforts are required for FIFA to implement its human rights commitment in accordance with the UN Guiding Principles on Business and Human Rights.

The FIFA Human Rights Policy, which is published alongside this update report, is an important milestone in these efforts. It serves as a foundation for further systematising and strengthening FIFA's work on human rights. Among the priorities for the coming months are:

- Finalisation of the bidding and hosting documents for the 2026 FIFA World

Cup, including detailed human rights requirements;

- Continued implementation of the Sustainability Strategy and Action Plan for the FIFA Confederations Cup 2017 and the 2018 FIFA World Cup in Russia;
- Development of a Sustainability Policy and Strategy for the 2022 FIFA World Cup in Qatar, and continued engagement with the Supreme Committee on efforts towards ensuring respect for labour standards; and
- Development of action plans on salient human rights issues including, in particular, the enhancement of efforts to protect players' rights and to embed human rights among member associations.

FIFA is committed to continuing its efforts to implement its human rights commitment across the organisation. As such, it looks forward to continued engagement with its various external stakeholders on that journey.

## Annexe: Implementation status of recommendations developed by Professor John Ruggie

In 2015, FIFA commissioned John Ruggie, Professor at the Kennedy School of Government at Harvard University and author of the UNGPs, to draft a [report on FIFA's human rights responsibilities](#) in light of the UNGPs.

As part of this report, Professor Ruggie outlined 25 recommendations in six categories on how FIFA should integrate respect for human rights in its operations.

FIFA has been using these recommendations as guidance and as a benchmark for its human rights-related efforts since the report was published in March 2016. In the first year of this work, FIFA has engaged in implementation efforts on all of the 25 recommendations. Four recommendations have been fully implemented. A further six are in advanced stages and closed to being implemented. On the remaining 15 recommendations, work is ongoing (see table page 21).

Category	Recommendation (summarised by FIFA)	Status*
<b>1. Adopt a clear and coherent human rights policy</b>	1.1 Adopt and make publicly available a human rights policy	<b>4</b>
	1.2 Align Codes with statutory human rights commitment and Human Rights Policy	<b>2</b>
	1.3 Ensure statutory human rights commitment is mirrored in requirements for statutes of Member Associations and Confederations	<b>2</b>
<b>2. Embed respect for human rights</b>	2.1 Designate a member of top management with accountability for human rights performance	<b>4</b>
	2.2 Identify appropriate department to hold day-to-day responsibility for implementation of human rights commitment	<b>4</b>
	2.3 Establish cross-functional structure on human rights	<b>4</b>
	2.4 Ensure that governing bodies take full account of FIFA's human rights commitment	<b>2</b>
	2.5 Elect members of Governance Committee with recognised human rights expertise	<b>2</b>
	2.6 Ensure that staff with significant role in implementing human rights commitment has adequate training, capacity and resources	<b>2</b>
	2.7 Establish formal structures for regular engagement with key stakeholders	<b>2</b>
<b>3. Identify and evaluate human rights risks</b>	3.1 Include risks to people in its systems for identifying and assessing risks associated with its activities and business relationships	<b>2</b>
	3.2 Include human rights within criteria for evaluating bids to host tournaments and make them substantive factor in host selection	<b>3</b>
<b>4. Address Human Rights Risks</b>	4.1 Set explicit human rights requirements for Local Organising Committees in bidding documents and provide guidance on them	<b>3</b>
	4.2 Reflect human rights commitment in government guarantees for FIFA tournaments	<b>3</b>
	4.3 Work with Local Organising Committees to engage host governments on human rights throughout tournament cycles	<b>2</b>
	4.4 Build leverage into supply chain relationships from the earliest stage possible to prevent negative impacts on people	<b>2</b>
	4.5 Use its annual member associations' conferences and mentoring activities to raise awareness of human rights responsibilities	<b>2</b>
	4.6 Consider suspending or terminating relationships where FIFA is unable to reduce severe human rights impacts by using leverage	<b>2</b>
<b>5. Track and report on implementation</b>	5.1 Include requirements for adequate public reporting by LOCs in bidding documents for World Cups	<b>3</b>
	5.2 Task local staff and operational teams sent from headquarters with monitoring implementation of human rights measures	<b>3</b>
	5.3 Enhance internal capacity to monitor the implementation of human rights provisions in contracts with suppliers and licensees	<b>2</b>
	5.4 Provide more in-depth reporting about how it understands and addresses human rights risks and actual impacts	<b>3</b>
<b>6. Enable Access to Remedy</b>	6.1 Require LOCs to establish effective grievance mechanisms with appropriate thresholds for complaints to be escalated to FIFA itself	<b>2</b>
	6.2 Review dispute resolution system for football-related issues to ensure it does not lead to lack of access to effective remedy	<b>2</b>
	6.3 Review expectations of procurement and licensing suppliers and member associations on complaints processes, support improvements	<b>2</b>

\* Categories of implementation status: 4 – implemented; 3 – advanced stages; 2 – ongoing; 1 – implementation not started yet

