

UPDATE FROM FIFA ON THE RECOMMENDATIONS OF THE FIFA HUMAN RIGHTS ADVISORY BOARD

COVERING THE PERIOD OF SEPTEMBER 2018 TO NOVEMBER 2019

JANUARY 2020

FIFA[®]

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INTRODUCTION

In February 2016, FIFA strengthened its commitment to human rights with an amendment to FIFA's Statutes' article 3, which states that FIFA is committed to respecting all internationally recognised human rights and shall strive to promote the protection of these rights. This commitment was integral to FIFA's new organisational strategy FIFA 2.0: The Vision for the Future¹ published in October 2016 and specified in FIFA's Human Rights Policy adopted by the FIFA Council in April 2017.²

Since 2016, FIFA has taken great strides in implementing that commitment and strategically embedding respect for human rights throughout its operations. The independent FIFA Human Rights Advisory Board ("the board") has accompanied that process since its inception in early 2017. Its eight expert members from the UN system, trade unions, civil society organisations, and FIFA sponsorship partners provide advice and formal recommendations to FIFA with the board meeting twice a year with representatives of the FIFA administration. Its members receive no financial compensation from FIFA for their work.³

In this report, FIFA gives an update on its work between September 2018 and November 2019 in relation to the advisory board's recommendations, both in narrative form and through status updates that are agreed upon with the advisory board.⁴ These reports allow for enhanced transparency of FIFA's human rights work and its engagements with the advisory board. The breadth of the recommendations by the advisory board covered in this report reflects the wide-ranging nature of topics discussed between FIFA and the board. As was the case with the previous recommendations, the recommendations discussed in this report have proven to be very helpful to the teams at FIFA who work to integrate FIFA's human rights commitment into the organisation's daily operations and activities.

This report builds on previous reports of the board, in particular the second report of September 2018, which includes updates by FIFA,⁵ and the board's third report of June 2019.⁶

¹ See: https://resources.fifa.com/mm/document/affederation/generic/02/84/35/01/fifa_2.0_vision_low_neu.17102016_neutral.pdf (pp. 62-64).

² See: https://resources.fifa.com/mm/document/affederation/footballgovernance/02/89/33/12/fifashumanrightspolicy_neutral.pdf.

³ For the board's terms of reference, see: <https://resources.fifa.com/image/upload/human-rights-advisory-board-terms-of-reference.pdf?cloudid=uvmsynwru9dpmyu5rgmi>.

⁴ For an overview on the status of all of the board's recommendations, see Annexe 1. The status updates are agreed on between FIFA and the board and include four categories: 01 – implementation not yet started; 02 – implementation ongoing; 03 – implementation at an advanced stage; 04 – recommendation implemented/closed out.

⁵ See: <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf?cloudid=hwl34aljrosbxevkwwh>.

⁶ See: <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbmx6wczrmwlk9rcr>.

UPDATES ON RECOMMENDATIONS

The updates on the recommendations by the board are based on FIFA's approach to human rights in line with FIFA's Human Rights Policy and the FIFA Activity Update on Human Rights of May 2017.¹ This approach closely follows the UN Guiding Principles on Business and Human Rights (UNGPs) and is structured along four pillars covering eight work areas: commit and embed, identify and address, protect and remedy, and engage and communicate.

For each of the sections, a brief overview and context of FIFA's work is provided, followed by updates on the work in relation to each of the board's recommendations in the respective area. An overview of the status of all recommendations by the advisory board is provided in the Annexe.

¹ See: https://resources.fifa.com/mm/document/affederation/footballgovernance/02/89/33/21/activityupdate_humanrights_may2017_neutral.pdf.

1. Commit and embed

Overview and context

FIFA's basic commitment to respecting human rights is integrated into the FIFA Statutes and specified in FIFA's Human Rights Policy of April 2017. The work to strategically embed respect for human rights across all areas and levels of the organisation has been ongoing since early 2016.

Between September 2018 and November 2019, the period covered by this report, the efforts to embed respect for human rights were consolidated and strengthened in four main ways:

- First, FIFA has strengthened the integration of human rights in the day-to-day work of a range of additional areas and topics. An important example in that respect is the increased ownership of the Member Associations' Division on human rights-related areas, exemplified by the development of the FIFA Guardians™ child safeguarding programme and toolkit for member associations.¹ Other examples include the integration of human rights requirements into a series of bidding processes for FIFA tournaments, including the FIFA Women's World Cup 2023™, led by the FIFA Tournaments & Events Division, or the embedding of human rights in safety- and security-related efforts, exemplified by the integration of human rights as a cross-cutting theme into the multi-year training programme for public security commanders responsible for the FIFA World Cup 2022™, based on new FIFA requirements.
- Second, FIFA's human rights-related profile was strengthened through the revisions of several FIFA regulations. These include changes to the FIFA Forward Programme Regulations² with respect to child safeguarding, accessibility and human rights obligations of the beneficiaries of these development funds, amendments to the FIFA Disciplinary Code³ with respect to discrimination, the FIFA Code of Ethics⁴ regarding sexual misconduct and due process, and the FIFA Regulations on the Status and Transfer of Players⁵ as part of the first reform package agreed on by the key football stakeholders, including players' unions.
- Third, FIFA added additional human rights specialists to the team. In October 2018, a FIFA Accessibility & Diversity Manager joined the Sustainability & Diversity Department. In January 2019, the FIFA Member Associations Division hired a Senior Safeguarding and Child Protection Manager. Three additional members with human rights responsibilities, including a human rights manager, are being added to the sustainability team at the FIFA subsidiary FIFA World Cup Qatar 2022 LLC (Q22) in late 2019 and early 2020. Furthermore, FIFA is committed to continuing to expand the relevant teams at its headquarters in Zurich including its human rights expertise in 2020.
- And fourth is the strengthening of the profile of human rights through institutional changes with the creation of a specialised Division for Social Responsibility & Education within FIFA in September 2019, led by a new Chief Social Responsibility & Education Officer. These institutional changes further support the embedding of human rights as a topic that informs all aspects of FIFA's activities. It does so for instance by anchoring human rights more firmly in discussions at the level of the FIFA management board and through the allocation of additional resources to the topic.

¹ See: www.fifa.com/about-fifa/who-we-are/news/fifa-launches-child-safeguarding-programme-and-toolkit-fifa-guardianstm#fifa-guardianstm-presentation.

² See: <https://resources.fifa.com/image/upload/1659-fifa-forward-development-programme-regulations-fifa-forward-2-0.pdf?cloudid=qdot1ebd3e4k9fmimmke>.

³ See: <https://resources.fifa.com/image/upload/1681-new-fifa-disciplinary-code-2019-edition.pdf?cloudid=os7adxtj00xfqw3kdpl3>.

⁴ See: <https://resources.fifa.com/image/upload/1683-amendments-to-the-fifa-code-of-ethics-2019-edition.pdf?cloudid=qtxot70f3tbx0u0zdgp>.

⁵ See: <https://resources.fifa.com/image/upload/1679-amendments-june-and-october-2019.pdf?cloudid=yhpcqh0syjuzaccv1yrz>.

Two of the advisory board's open recommendations relate to the continuous efforts to more firmly embed respect for human rights throughout the FIFA administration and its strategic bodies. The status of both of these recommendations is ongoing.

Recommendations

- R4.** *That FIFA continue developing a more strategic approach to embedding respect for human rights across the Administration, in particular by focusing on key staff that need specialized training or support in order to integrate human rights into their daily work, and developing indicators to measure the effectiveness of the training that staff receive [Ruggie 2.6]. (First Advisory Board report, September 2017)*

Update from FIFA

As mentioned above, the FIFA Sustainability & Diversity Department has continued its efforts to embed respect for human rights throughout a wide range of new areas since September 2018 with considerable success. All of these collaborations and engagements include efforts by FIFA's internal human rights experts to sensitise and support relevant FIFA staff on FIFA's human rights commitments. FIFA recognises that there is room to strengthen these efforts through a systematised training course, including through the development of respective indicators, and will consider developing such training for key staff in 2020.

Status update: implementation ongoing

- R5.** *That FIFA review how it informs members of the various standing committees and the Council about FIFA's human rights responsibilities to ensure it includes appropriate information about Ruggie's report and recommendations [Ruggie 2.6]. The process should be fully reflective of FIFA's emerging policies and processes on human rights. (First Advisory Board report, September 2017)*

Update from FIFA:

FIFA currently has an e-learning course in place that is mandatory for all FIFA standing committee members. The course includes a module on human rights. FIFA plans to review the course, including the module on human rights, in 2020.

Status update: implementation ongoing

2. Identify and address

Pillar two of FIFA's human rights approach includes the work areas "identify" and "address", incorporating key elements of a human rights due diligence process as described under the UNGPs. Most of the recommendations by the advisory board fall under this pillar. They cover efforts regarding overall risk identification, work in relation to FIFA tournaments, and efforts related to FIFA's role in world football governance.

2.1. Risk identification

Overview and context

FIFA's wide-ranging activities and business relationships require the organisation to put in place a set of processes and systems to identify potential and actual risks to people. Generally, such risk identification takes place at two levels: first is the organisational-level identification of salient human rights risks that informs the structuring and prioritisation of FIFA's efforts on human rights. In 2016 and 2017, FIFA identified the human rights areas it considers most salient in terms of the severity of its activities' potential adverse impact on people. The main areas of salient human rights risks are outlined in paragraph 5 of FIFA's Human Rights Policy and operationalised as FIFA's ten most salient human rights risks, published alongside the policy in the FIFA Activity Update on Human Rights of May 2017.⁶

Second is the undertaking of operational-level risk assessments that are specific to a particular risk area or operation. These processes necessarily correspond to factors, such as the particular issue in question, the geographic location where it may take place, as well as the stakeholders involved. Such detailed human rights risk assessments are, for instance, carried out with respect to individual FIFA tournaments, through requirements in bidding processes and as part of the subsequent development of sustainability strategies in collaboration with the tournament hosts.

Two of the advisory board's recommendations pertain to efforts of overall risk identification. Implementation is ongoing on both of these recommendations.

Recommendations

- R8.** *That FIFA prioritise its efforts to develop systems to more consistently identify the greatest risks to people affected by FIFA's activities and business relationships, especially where actual harm has occurred or may be imminent or where access to remedy is needed. (First Advisory Board report, September 2017)*

Update from FIFA:

The update provided by FIFA in the second report of the advisory board outlines a range of processes to identify human rights risks introduced over the past years.⁷ FIFA has continued to implement these processes during the period covered by this report and further expanded its efforts to ensure it learns about potential and actual adverse impacts that may be linked to its activities. Additional measures put in place, since September 2018, include:

- The implementation of a pilot event-time safeguarding mechanism during the FIFA Women's World Cup in France 2019, developed and carried out in collaboration with the independent expert organisation

⁶ See: https://resources.fifa.com/mm/document/affederation/footballgovernance/02/89/33/21/activityupdate_humanrights_may2017_neutral.pdf (box 2, page 10).

⁷ See: <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf?cloudid=hw134aljrosbxevkwwh> (pages 39-40).

- Safe Sport International. The outcome of this pilot project was evaluated and informs the long-term strategic approach to event safeguarding for FIFA tournaments and events;⁸
- The definition of a remedy architecture for rights-holder groups potentially affected by the FIFA World Cup Qatar 2022™ based on a study of existing routes to remedy mandated by FIFA and carried out in collaboration with external human rights experts;
 - The continued strengthening of relationships and engagements on particular cases and topics with various stakeholders – including in particular FIFPro, Human Rights Watch, the Fare network, and other stakeholders represented on the advisory council of the Centre for Sport and Human Rights – who are likely to learn about the adverse impact associated with FIFA's activities; as well as with individual human rights defenders (examples include the case of abuse in Afghan football, the stadium ban for women in Iran, or the case of a Sudanese football player who was temporarily detained after participating in protests in his country);
 - The start of a review of FIFA's systems to learn about and address human rights-related cases in football, which includes an assessment of current mechanisms and procedures.

In early 2020, FIFA will focus its efforts on the identification of human rights risks associated with the FIFA Club World Cup China 2021™. FIFA will also more generally continue to strengthen its relationships with human rights defenders working to advance human rights in relation to FIFA's activities.

Status update: implementation ongoing

- R9.** *That the Administration's comprehensive mapping exercise to identify salient human rights issues should be tested with informed stakeholders who can validate and/or challenge the findings. The Advisory Board intends to provide more specific comments as the process moves forward. (First Advisory Board report, September 2017)*

Update from FIFA:

It should be noted that the process that led to the identification of the ten most salient human rights risks to FIFA in 2016 and 2017 is built on the respective chapter in John Ruggie's report "FIFA & Human Rights"⁹ and on wide-ranging consultations with internal and external stakeholders, including the members of the advisory board, as part of the process to develop FIFA's Human Rights Policy.

In late 2018 and early 2019, FIFA worked with external human rights experts to assess the progress made since the introduction of FIFA's human rights commitment in its statutes in February 2016 and to identify priority areas for further progress. This process involved exchanges with 32 external stakeholders and sets the basis for the development of a stand-alone human rights report in 2020, which will be both forward-looking as well as reviewing FIFA's most salient human rights risk areas. As part of the development of the report and the identification of priority areas going forward, FIFA intends to consult again with external stakeholders.

Status update: recommendation implemented/closed out

⁸ See: www.safesportinternational.com/.

⁹ See: www.hks.harvard.edu/sites/default/files/centers/mrcbg/programs/crj/files/Ruggie_humanrightsFIFA_reportApril2016.pdf (chapter 4).

2.2. Recommendations in relation to FIFA tournaments

The organisation of tournaments is one of FIFA's key areas of activity and is also a main source of human rights risk. Five of the ten most salient human rights risks identified by FIFA fall under the category of tournament-related risks.¹⁰ These comprise risks associated with the construction of event-related infrastructure, supply chains, recruitment and working conditions of local staff and volunteers, the provision of safety and security, as well as discrimination linked to events.

The board's recommendations with respect to FIFA tournaments refer to the bidding and hosting requirements introduced in November 2017, the ongoing work to identify and address human rights risks associated with the FIFA World Cup Qatar 2022, as well as a small number of additional recommendations associated with tournaments more generally.

2.2.1. Bidding and hosting requirements introduced in November 2017

Overview and context

The human rights requirements introduced in November 2017 have become an integral part of the standard bidding process for FIFA tournaments. The overall requirement to bidding member associations and host countries – i.e. to plan and deliver an event in which all actors involved uphold their respective responsibilities to protect and respect human rights under the UNGPs – is the same across all tournaments. Whilst the overall requirements to respect human rights are the same for all bidders, the depth of preparatory documentation required varies according to the size of the tournament and the anticipated level of risk.

Since September 2018, FIFA has evaluated the human rights risks associated with the bids for six tournaments.¹¹ The FIFA Women's World Cup 2023 bidding process is currently ongoing with bidders required to include an independent context assessment, to develop a strategy (following a pre-structured form), as well as to procure the respective commitments and guarantees from governments and other entities involved.¹² The Centre for Sport and Human Rights independently conducted webinar sessions to support bidders interested in bidding for the FIFA Women's World Cup 2023 in the development of the human rights-related components of their bids.

An exception to the standard bidding processes was the selection of the host for the new FIFA Club World Cup (FCWC) in 2021, the new format of which was decided on by the FIFA Council in March 2019. Given the shorter timelines for the new competition, the FIFA administration held an informal evaluation process with a number of potential host member associations before proposing the Chinese Football Association (CFA) to the FIFA Council on 22 October 2019. The FIFA Council subsequently decided to appoint the CFA to host the FCWC 2021. Based on existing practice, FIFA is working together with the CFA to integrate human rights requirements into the hosting arrangement of the FIFA Club World Cup 2021. These requirements extend to the host member association and include guarantees and commitments by the host country authorities to respect human rights in all activities associated with the tournament in accordance with the UNGPs.

The FIFA Bureau of the Council decided on 18 March 2020 to postpone the new FIFA Club World Cup originally scheduled in June/July 2021 to enable the UEFA EURO and the CONMEBOL Copa América that have been delayed by COVID-19 to take place in this period.

¹⁰ See: https://resources.fifa.com/mm/document/affederation/footballgovernance/02/89/33/21/activityupdate_humanrights_may2017_neutral.pdf (box 2, page 10).

¹¹ These tournaments are the FIFA Beach Soccer World Cup 2019™, the FIFA U-17 Women's World Cup 2020, the FIFA U-20 Women's World Cup 2020™, the FIFA Beach Soccer World Cup 2021™, the FIFA U 20 World Cup 2021™ and the FIFA U-17 World Cup 2021™.

¹² For the documents submitted by the four bidders, see: www.fifa.com/womens-football/news/fifa-women-s-world-cup-2023tm-four-bids-submitted.

Two of the advisory board's open recommendations refer to the new bidding requirements. Implementation is ongoing on one of the two recommendations.

Recommendations

R49. *That FIFA reflect on how integrating human rights into the FIFA World Cup bidding process worked and share its conclusions publicly, including how it could further strengthen the process in future, in part so that other sports organisations now embarking on a similar path can benefit from its experience. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA has already held a series of informal discussions with individuals and entities involved in developing the human rights components for the two bids for the FIFA World Cup 2026™. FIFA also intends to hold a structured consultation process following the selection of the host for the FIFA Women's World Cup 2023 in June 2020, when a critical mass of member associations will have been subject to category A and B bidding processes, which require more extensive preparation and documentation.

Status update: implementation ongoing

R48. *That evidence of bidders' ability to assess and manage human rights risks is comprehensively taken into account by all levels of the organisation in the FIFA World Cup 2026 decision-making process. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA's evaluation of the human rights-related documentation submitted by the bidders for the FIFA World Cup 2026 was an integral part of the bid evaluation report submitted to the FIFA Council and FIFA Congress and published on FIFA.com. FIFA also published the independent evaluation reports of the strategies submitted by the bidders, conducted by Business for Social Responsibility (BSR) and the strategy documents, bid books and independent human rights context assessments.¹³ The prominent public coverage of the human rights components of the bids in the lead up to the FIFA Council and Congress meetings is likely to have increased the attention on this matter of those responsible to take the decision.

In view of the fact that the human rights risks associated with both bids were evaluated as 'medium', it can be assumed that human rights risks were not seen as a major factor in determining the vote cast by individual members of the FIFA Congress.

Status update: recommendation implemented/closed out

¹³ See: <https://www.fifa.com/about-fifa/who-we-are/news/2026-fifa-world-cup-evaluation-report-published-bids-submitted-to-fifa-council>.

2.2.2. FIFA World Cup Qatar 2022

Overview and context

During the period covered by this report, FIFA has continued its efforts to address human rights risks associated with the FIFA World Cup Qatar 2022 (FWC 2022). These efforts are carried out in close collaboration with the other entities leading the tournament organisation. These are the FIFA World Cup Qatar 2022 LLC (Q22), a FIFA subsidiary based in Qatar, and the Supreme Committee for Delivery and Legacy (SC), which is responsible for host country operations.

This work is informed by the sustainability strategy for the FIFA World Cup 2022, which was developed jointly by the three entities.¹⁴ The sustainability strategy is based on an in-depth human rights salience analysis, which included several rounds of consultation in which a total of 22 external human rights stakeholders participated (59 organisations were invited to provide input).

The FWC 2022 sustainability strategy is delivered through a joint effort by the three tournament organisers. Since September 2018, they have developed action plans and milestones to implement the 78 key initiatives resulting from the sustainability strategy and allocated respective responsibilities. The leading roles in that respect are played by the FIFA Social Responsibility and Education Division, the Sustainability team at Q22, as well as the Workers' Welfare Department and the Sustainability team at the SC. Other departments that are closely involved in its delivery include in particular the departments of the three entities responsible for safety and security, procurement, and communication.

The sustainability team at Q22, besides delivering many of the initiatives, plays a coordinating role on the implementation of the action plan to deliver the strategy. In December 2019, FIFA further strengthened the Q22 team based in Qatar by hiring an additional Sustainability Manager. Three further positions, a Human Rights Manager, a Sustainable Procurement Manager and a Social Responsibility and Accessibility Manager are to be filled in 2020.

In addition to the preparations for the FIFA World Cup 2022, described in more detail below, FIFA also held the FIFA Club World Cup in Qatar from 11 to 21 December 2019 with key areas of tournament-time human rights risks identified through the strategy process for the FIFA World Cup, implemented for that tournament. These included:

- the implementation of a programme to ensure that the event is accessible for disabled people, including with respect to infrastructural adjustments and operational assistance;
- a series of meetings with clubs and fans of Liverpool FC led by the SC in order to discuss and address concerns of the club and fans, including with respect to LGBTI+ fans travelling to Qatar;
- implementation of anti-discrimination procedures by FIFA and Q22 in the stadium, including with respect to LGBTI+ fans;
- the implementation of FIFA's tobacco-free policy for all stadiums;

¹⁴ See: <https://www.fifa.com/worldcup/qatar2022/news/fifa-and-hosts-qatar-present-first-ever-joint-fifa-world-cuptm-sustainability-st>.

- a free and fair accreditation process for journalists and a complaints mechanism for human rights defenders and journalists;
- the deployment of two sustainability venue managers for each stadium to ensure the implementation of sustainability projects (including those related to environmental sustainability).

The recommendations of the advisory board concerning the FIFA World Cup Qatar 2022 can be grouped into three areas: workers' rights, other human rights-related topics, and the discussion in the first half of 2019 around a possible expansion of the tournament to 48 teams.

Recommendations

a) Workers' rights

Overview and context

Working to ensure the welfare of workers involved in delivering the infrastructure and services for the FIFA World Cup and respect for their rights has been a critical component of FIFA's human rights-related efforts over the past years. In that respect, FIFA has established a close and trusted relationship with the SC, which is responsible for the delivery of host country infrastructure and services for the FIFA World Cup Qatar 2022.¹⁵

In line with the sustainability strategy, FIFA differentiates between three categories of activities and related objectives with respect to workers' rights associated with the FIFA World Cup Qatar 2022:

- efforts to ensure decent working and living conditions and fair recruitment for workers engaged in the construction of, and provision of services for, FIFA World Cup 2022 sites;
- efforts to enable access to effective remedy for workers engaged in the construction of, and provision of services for, FIFA World Cup 2022 sites; and
- efforts to promote decent working and living conditions and fair recruitment, including effective access to remedy, for workers engaged through other construction projects and supply chain relationships directly linked to the FIFA World Cup Qatar 2022.

Throughout the period covered by this report, the SC has further enhanced its efforts to ensure the welfare of construction workers engaged at FIFA World Cup stadium and training sites. This effort has been ongoing for several years and is recognised by a range of international organisations and experts. Further information on these efforts and their evolution can be found in the updates on several of the board's recommendations below and on the SC's dedicated workers' welfare webpage, which includes reports developed by the SC, reports jointly published by Building and Wood Workers' International (BWI) and the SC, as well as reports of the independent monitor Impactt Ltd.¹⁶

¹⁵ For various reports on this work, including by the independent auditor Impactt Ltd., or by the SC and the Building and Wood Workers' International, see: www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency.

¹⁶ See: www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency.

A key development of the efforts by the SC, Q22 and FIFA during the reporting period was the expansion of the scope of activities beyond construction workers to increasingly include tournament services workers. This expansion was required because the tournament preparation moved into a new phase and a growing number of relationships with service providers for areas such as accommodation, hospitality and transportation are being established. These activities involve, in particular, the inclusion of the SC's Workers' Welfare Standards in tender processes and contractual relationships with such third parties and initial bilateral and multi-stakeholder engagements with the hotel sector (see update on recommendation 27 below).

Furthermore, 2019 saw important developments in Qatar's labour law reform process with the announcement of the full abolition of the exit permit system in the country. FIFA very much welcomes these changes and is confident that their enforcement will have a positive impact on the tournament organisers' efforts to ensure the welfare and respect of rights of all Qatar-based workers involved in the preparation of the tournament.

The recommendations of the advisory board refer to measures in all three of the above-mentioned categories. While several of these recommendations have been closed out, efforts on a number of other recommendations are ongoing, some of them are at an advanced stage.

Recommendations

R22. *That FIFA actively explore ways to use its leverage to engage with the host government about the impact of the kafala system on migrant workers involved in World Cup-related construction. (First Advisory Board report, September 2017)*

Update from FIFA:

As per the update provided in the second report of the advisory board,¹⁷ FIFA's leadership raises its support for the labour reform agenda in its direct engagements with high-level representatives of the Qatari government. FIFA has further expressed its position and expectation in that respect in various public statements.

The SC, FIFA's partner in Qatar, is involved in several political and issue-specific committees to support the labour law reform process, building on the systems developed for FIFA World Cup sites, including with respect to worker committees, or heat stress mitigation.

FIFA was extremely pleased to see the announcement by the Qatari government of the full abolition of the exit permit system and will continue to follow closely the implementation of that commitment.

Status update: implementation at an advanced stage

R27. *FIFA should be actively encouraging other companies linked to FIFA World Cup-related construction in host countries, such as major hotel companies, to support respect for international labour rights standards, as well as the adoption of independent labour monitoring practices, in connection with their operations. Good practices developed by FIFA and its local partners in specific contexts should be shared with a wider audience in the long-term interests of workers and the FIFA World Cup brand. (First Advisory Board report, September 2017)*

¹⁷ See: <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf?cloudid=hwl34aljrosbxevkwwh> (p.56).

Update from FIFA:

An important development of the worker-related efforts by FIFA and the other tournament organisers since the publication of the last update on this recommendation in September 2018 was the broadening of the scope of efforts to help protect workers beyond those employed in stadium and training site construction. These efforts comprised the following elements:

- The integration of workers' welfare-related requirements into tenders of service providers and the integration of human rights into the sustainable procurement policy and procedures for all tournament organisers.
- The piloting of monitoring a small number of hotels with respect to compliance with the SC's Workers' Welfare Standards, which should lead to a broader programme in that respect.
- The active participation by FIFA's subsidiary Q22 in the multi-stakeholder initiative on the hospitality sector in Qatar, led by the ILO and ADLSA, managed by IHRB, and which also involves the International Tourism Partnership, trade unions and the Supreme Committee. This involvement included presenting tournament organisers' efforts regarding construction sites for the FIFA World Cup and feedback provided on several guidance notes developed as part of the process.

In addition, the Supreme Committee has continued to take a range of measures and share best practices on enforcing its Workers' Welfare Standards. For instance, it continues to report publicly about progress and challenges¹⁸ and engages with other key infrastructure developers through the Karama Initiative. Furthermore, the SC participates in several formal committees that feed into the labour reform process and works with the Ministry of Labour and the ILO on particular topics. An example in that respect is the joint study commissioned with the ILO and the Ministry of Labour on heat stress mitigation measures.¹⁹

Status update: implementation ongoing

R50. *That FIFA engage with the SC to promptly bring in recognized global experts to independently assess the heat stress index being used and the trigger points for remedial action, preferably during a joint SC-BWI inspection. (Second Advisory Board report, September 2018)*

Update from FIFA:

In 2019, the SC partnered with the ILO and the Qatari Ministry of Labour, as well as the FAME Lab from the University of Thessaly, which is seen as a leading institution in this field, to assess heat stress for workers in Qatar. The independent research institution collected data on workers' physiology and labour effort, covering more than 5500 work hours. The research examined a construction site with 4000 workers (a World Cup stadium) with a comprehensive heat stress management plan, and a farm with fewer precautions in place. The research examined different strategies for mitigating heat strain, focusing on hydration, work-rest ratios and clothing.

¹⁸ See: www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency.

¹⁹ See: www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_723545.pdf.

The study confirmed the overall effectiveness of the SC's heat stress management plans and provides the SC with information to further enhance its systems. It furthermore sets a scientific basis for the ILO and the Qatari Ministry of Labour to propose country-wide improvements of heat stress measures and respective regulations.²⁰ The study was carried out largely independently from the collaboration with BWI.

Status update: Recommendation implemented/closed out

R51. *That FIFA engage and support the SC in identifying how the implementation of current and additional mechanisms to address the risk of heat stress can be further strengthened in the areas of: safety training for workers and their supervisors (for example, in identifying early warning signs of heat exhaustion); ensuring proper rest periods, regular intake of fluids and proper application of PPE; modifying targets and work rates to reduce physical exertion and scheduling heavy or strenuous work for cooler times of the day; and improving on-site cooling devices for workers. (Second Advisory Board report, September 2018)*

Update from FIFA:

The SC recognises the risks to workers' health due to high temperatures and has over the past years continuously strengthened its measures to address such risks. In particular, the SC requires all main contractors to put in place a heat stress management plan that is reviewed and approved by the SC. The SC then audits its contractors on the enforcement of the plan throughout the period of high temperatures. The SC furthermore developed and distributed innovative cooling work wear for workers on its sites.²¹

The strategies include measures such as the availability of shaded areas, water station with cool water and dehydration salts, the mandatory carrying of a water bottle by the workers, ventilated and cooled rest areas, annual medical checks and individual medical care plans, trainings for workers on the effects of heat stress and dehydration as well as measures to prevent it. Furthermore, the SC ensures that workers are able to self-pace their work and take breaks when they need it. These measures are taken beyond compliance with mandatory work stoppage from 11.30am to 3pm during summer months that are mandated by Qatar law.

An independent study conducted throughout 2019 by the University of Thessaly and in collaboration with the ILO and the Qatari Ministry of Labour concluded that the steps taken by the SC are effective overall. The study states that the workers on the SC stadium construction site were at low risk of occupational heat strain. It attributes this to the SC's implementation of heat mitigation protocols. The experts leading the study highlighted the effectiveness of existing heat stress management systems, primarily on-site cooling rooms and increased focus on regular hydration, cooling workwear, and, critically, empowering workers to communicate with supervisors and take regular breaks.

²⁰ See: https://www.ilo.org/beirut/projects/qatar-office/WCMS_723539/lang--en/index.htm.

²¹ For an overview, see e.g.: https://www.business-humanrights.org/sites/default/files/documents/Guardian%20Response%2030_9_2019.pdf.

The SC is currently assessing how it can further improve its measures based on the detailed results of the study, including with respect to the heat stress measurement system employed on SC sites.

Status update: Recommendation implemented/closed out

R52. *That FIFA support the SC in tracking the implementation of recommendations in the SC-BWI Joint Working Group that highlighted the need to synchronize clinic records and provide clinical staff at the accommodation centres with occupational health awareness training and to link the medical screening of workers, and their general health and wellbeing, with the assessment of occupational risks at the construction sites. This includes the identification and consideration of any underlying (i.e. chronic) or current medical conditions that may impact fitness to work or the assignment of work duties (Second Advisory Board report, September 2018)*

Update from FIFA:

Throughout 2018 and 2019, the SC took a range of steps to strengthen the medical care system for its workers. This includes the implementation of comprehensive health screening for all of its workers in partnership with the Qatar Red Crescent and follow-up health care for those who need it. The SC thereby partnered with the Phoenix Partnership to deliver a ‘one patient, one record’ approach, centralising the medical records for all its workers. Furthermore, the SC continued to implement its emergency medical response strategy. This included an important effort of training for health staff to recognise and mitigate work-related health problems and the enhancement of respective equipment at accommodations.²²

Overall, and as demonstrated in the joint reports published by the SC and BWI, the SC is taking the recommendations provided by BWI very seriously. This has led to a trusted relationship between the two organisations over the past three years.²³

Status update: Recommendation implemented/closed out

R53. *That FIFA engage with the SC to help ensure that it is reviewing and aligning its efforts on protection of workers’ rights with the commitments outlined in the ILO technical cooperation agreement with the Government of Qatar. (Second Advisory Board report, September 2018)*

Update from FIFA:

The ILO’s technical cooperation agreement with the Government of Qatar covers the improvement in payment of wages, enhanced labour inspection and OSH systems, refinement of the contractual system that replaces the kafala system and improved labour recruitment procedures, increased prevention, protection and prosecution against forced labour, and promotion of the workers’ voice. All of these areas are part and parcel of the SC’s work on workers’ welfare and health and safety with regards to the sites under their responsibility.

²² For additional information see: <https://www.sc.qa/en/news/sc-releases-fourth-annual-workers-welfare-progress-report->

²³ For additional information, see the joint BWI-SC reports on their collaboration: <https://www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency>.

As per the sustainability strategy for the tournament and as discussed in other parts of this report (see e.g. recommendation 27), these efforts are now gradually expanded to also cover operational services workers involved in the delivery of the tournament. Furthermore, the SC is represented in the national steering committee (NSC), which was established to advise and guide the project implementation and is in regular exchange with both the ILO and the Ministry of Labour.

Status update: Recommendation implemented/closed out

R54. *That FIFA continue to support the renewed MOU between BWI and the SC. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA positively recognises the depth of collaboration and trust developed between the SC and BWI. FIFA has supported the engagement between these two entities since the start of the collaboration and will continue to do so as long as the two organisations see value in such joint efforts.

Status update: Recommendation implemented/closed out

R66. *FIFA should encourage the convening of, and participate in, a discussion by the ILO and Qatari Government on the creation of a shared set of labor standards across all construction projects in the country. The standards should draw on the elements of existing worker welfare standards and practice in the country that are most closely aligned with international human rights, and FIFA should publicly endorse the Ministry of Labor playing a central role in setting and meaningfully enforcing such standards. (Third Advisory Board report, May 2019)*

Update from FIFA:

FIFA is supportive of the idea of unifying workers' welfare standards in Qatar, as long as they do not lead to watering down existing standards used for FIFA World Cup sites. At the same time, FIFA believes that any process to unify standards needs to be led by entities with the respective mandate in Qatar, and in particular the Ministry of Labour.

In that respect, FIFA is pleased to see that the Workers' Welfare Standards of the SC are gaining increased traction within the country, both with companies and authorities. With the expanding scope of the worker-related efforts by the SC, FIFA and Q22 to other sectors relevant to the tournament, the SC's Workers' Welfare Standards (or slightly amended versions thereof that are specific to the sector in question) will likely become the reference standard for a growing number of entities in the country.

FIFA continues to engage with the SC to explore ways in which FIFA and Q22 may support efforts towards an agreement on more unified standards on workers' welfare in Qatar.

Status update: implementation ongoing

R67. *FIFA should promote the learning from the model of worker committees developed by the SC with support from BWI as a key input to the Ministry of Labor’s review and development of joint committees as part of the Qatari Government’s technical cooperation program with the ILO. This should include key features of the SC’s model such as meetings that are independent of management, free worker elections, training for worker representatives and ensuring the committees have the scope to discuss all relevant topics including wages and benefits. FIFA should also support the SC in promoting its model directly with the other companies involved in connected construction projects that come within the scope of the FWC 2022 Sustainability Strategy. (Third Advisory Board report, May 2019)*

Update from FIFA:

The Supreme Committee is closely involved in discussions with the Qatari authorities on the promotion and standardisation of, and possible legislation on, worker committees in the country. Furthermore, through the increased use of the SC’s Workers’ Welfare Standards, which are increasingly also included in relationships involving operational services workers, the SC, Q22 and FIFA will continue to promote the development and operation of the model of workers’ welfare forums developed by the SC. The workers’ welfare forums, were developed by the SC and continuously strengthened over the past years. During the period covered by this report, BWI played an important role in helping to enhance the efficacy of the forums, including through the support of election processes of worker representatives.

Status update: recommendation implemented/closed out

R68. *FIFA should demonstrate how it has used its leverage to help enable remedy for the affected workers in the Mercury MENA case, including through advocating with the Qatari Government for the effective operationalization of the Workers’ Support and Insurance Fund. This should include ensuring that the fund is able to cover future emergency payments as well as compensation for unpaid salaries in this and similar cases, that it is established with initial funding by the government and that it is retroactive for at least a year. (Third Advisory Board report, May 2019)*

Update from FIFA:

FIFA and the SC have repeatedly discussed the Mercury MENA case over the past year. While Mercury MENA has never been employed on a FIFA World Cup site, the Supreme Committee has discussed the matter several times with the Ministry of Labour, asking for information on efforts to provide the workers of Mercury MENA with a remedy. FIFA has publicly called on the Qatari authorities to ensure that all Mercury MENA workers receive adequate remedy and has also been in touch with Amnesty International to learn about the status of the case.

As of February 2020, it is FIFA’s understanding that, while several workers received the money they were owed by the company, a number of workers are still awaiting payment. FIFA will continue to follow this process.

Status update: implementation in advanced stages

R69. *FIFA should support a discussion involving all the key actors in the construction sector in Qatar, convened by an independent party such as the ILO, with the aim of generating broader understanding of the factors that appear to be contributing to a number of ‘non-work-related deaths’ among construction workers (including the physical environment, nutrition, and underlying chronic health conditions), the relationships between those factors, and what more can be done to address them. The discussion should involve concerned stakeholders and independent experts in order to define appropriate actions and measurable outcomes. (Third Advisory Board report, May 2019)*

Update from FIFA:

FIFA and the SC have repeatedly discussed this recommendation. The SC is in ongoing discussions with the Qatari Ministry of Labour and the ILO on issues relating to potential causes of non-work-related fatalities with the aim of promoting country-wide improvements, including in particular with respect to medical examinations and heat mitigation measures. The SC and Q22 have also exchanged information on that topic with other key infrastructure developers through the Karama initiative.

FIFA shares the view of the advisory board that there is a potential to further expand these exchanges to facilitate learning and countrywide progress. Any such discussion should build on the extensive work done by the SC to address health risks to workers, which during the period covered by this report, included:

- comprehensive medical exams conducted on all SC workers, enabling the systematic identification of pre-existing conditions and the development of individual health plans;
- the implementation and continued enhancement of heat stress mitigation plans, the effectiveness of which have been assessed and confirmed through a joint study with the ILO and the Ministry of Labour;²⁴
- the assessment and improvement of workers’ diets through continued collaboration with Weill Cornell Medicine – Qatar;
- the strengthening of emergency medical response processes, including through an enhanced training programme for medical professionals in accommodation, the installation of new panic alarm systems at accommodation sites, and the introduction of a centralised electronic medical-records management system.²⁵

FIFA is committed to stepping up its efforts to promote exchange and learning in this crucial area in the coming months, in particular as it expands the scope of its work on workers’ welfare in collaboration with the Supreme Committee.

Status update: implementation ongoing

²⁴ See: www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_723545.pdf.

²⁵ For more information, see: www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency.

R70. *FIFA should promote the effective implementation of the law abolishing exit permits, its extension to all migrant workers in the country, and support for the implementation of free labour mobility (meaning the ability to change employers) by late 2019 in its high-level exchanges with the Qatari Government. These are critical issues that go beyond the scope of operations of FIFA's partner, the SC, and which will affect the rights of many workers connected to the FWC 2022 in the construction, transportation, hotel and services sectors. (Third Advisory Board report, May 2019)*

Update from FIFA:

FIFA has, over the past years, used its high-level exchanges with the Qatari government to discuss progress on labour law reform and has repeatedly expressed its expectations publicly. Since this recommendation of the board was first made, the Qatari government has announced the abolition of the exit permit system for all workers in the country and also committed to ensuring free labour mobility for workers. FIFA very much welcomes these important steps and continues to follow this process closely.

Status update: implementation at an advanced stage

R71. *FIFA should use the opportunity of the study it has commissioned on access to remedy in relation to the FWC 2022 to explore how FIFA can support the emerging system of community liaison representatives from global trade unions sitting within the ILO's Qatar office to try to address cases involving harm to workers at an early stage before they escalate and the harm suffered by the workers is compounded. (Third Advisory Board report, May 2019)*

Update from FIFA:

FIFA sees a considerable potential in closer cooperation with community liaison representatives, particularly in the hospitality and transport sectors and has had initial exchanges with the respective parties. Such involvement can be important to identify risks and actual adverse impacts, as well as to address cases where appropriate. As part of the remedy architecture agreed on by the tournament organisers, there is an intention to strengthen that collaboration in particular as the scope of work expands to additional sectors, including the hotel and transport sectors.

Status update: implementation ongoing

(b) Other human rights areas

Overview and context

As part of the comprehensive human rights risk assessment that informed the development of the sustainability strategy for the FIFA World Cup 2022, FIFA assessed the human rights risks to a total of 13 rights-holder groups, seven of which were not related to workers. They include: volunteers, attendees, athletes, participating media representatives, human rights defenders, local community members and the wider community.

The efforts to address risks to these rights-holder groups are part of FIFA's commitment to delivering an inclusive FIFA World Cup tournament experience that is welcoming, safe and accessible to all participants, attendees and communities in Qatar and around the world. Key areas of work in that respect include:

- Efforts to ensure that the FIFA World Cup 2022 is accessible for disabled people and people with limited mobility, while facilitating accessibility across physical infrastructure, public transport and inclusive services in Qatar. In that respect, tournament organisers engage in an ongoing process of inspection visits and follow-up measures to ensure stadium construction follows FIFA's requirements concerning accessible infrastructure. Furthermore, an accessibility programme was implemented during the FIFA Club World Cup in Qatar in December 2019.
- Efforts to promote cultural exchange among parties involved in the FIFA World Cup Qatar 2022, with a focus on enhancing understanding of the culture of Qatar and the region. Since September 2018, FIFA and the other tournament organisers have, for instance, initiated the development of guidance on intercultural awareness.
- Efforts to prepare a welcoming and respectful environment for all participants and attendees. For the period covered by this report, the work in that respect focused mostly on measures to prevent and mitigate risks of discrimination to LGBTI+ spectators (see update on recommendation 72 below).
- Efforts to ensure respect for and help protect the rights of media representatives and human rights defenders in accordance with FIFA's Human Rights Policy and the FIFA statement on human rights defenders and media representatives.²⁶ In that respect, FIFA added a grievance hotline in October 2019, in addition to the existing web-based mechanism, and operated it during FIFA Club World Cup Qatar 2019™.²⁷

The advisory board's recommendations with respect to non-worker-related human rights risks refer to engaging with relevant groups on the prevention of discrimination of LGBTI+ individuals, providing support for the revision of legislation regulating media in Qatar, as well as stakeholder engagement. The implementation of steps regarding all of these recommendations is ongoing.

Recommendations

R72. *That FIFA build on the work that has been done to date with the SC's security team to look more comprehensively at risks to individuals due to their actual or perceived sexual orientation or gender identity in connection with the hosting of the tournament. This should go beyond international fans and also consider members of the local community who may face even greater threats. FIFA should conduct its own engagement with groups with insight into the perspectives of LGBT+ individuals and deepen its engagement with the SC on this topic, in order to develop credible mitigation measures and help build stakeholder confidence in how these risks will be handled. (Third Advisory Board report, May 2019)*

²⁶ See: <https://resources.fifa.com/image/upload/ejf1ecdku14lm2v9zc03.pdf>.

²⁷ No concerns were submitted to FIFA through the reporting mechanism.

Update from FIFA:

FIFA and the other tournament organisers have taken a close look at risks to LGBTI+ fans and community members that are associated with the tournaments in Qatar. The most salient risks of discrimination against LGBTI+ individuals are considered to be (a) exposure to discriminatory comments or gestures from fans both inside and outside the stadiums, (b) exposure to discriminatory comments or limitations to freedom of expression by security personnel, and (c) possible anxiety of LGBTI+ fans due to fears of arrest, detention or other forms of serious persecution.

Since the publication of the second advisory board report in 2018 FIFA continued working with the SC and several Qatari ministries on all of the identified risk areas concerning LGBTI+ fans and community members. In line with these discussions and commitments by the Qatari hosts, the SC has continuously reiterated its message to reassure LGBTI+ fans about their well-being when travelling to Qatar.²⁸

The tournament organisers have furthermore continued the implementation of a set of measures to prevent risks to LGBTI+ individuals who will travel to Qatar. These include:

- the continued implementation of an extensive training programme for 450 selected commanders of different security agencies in Qatar, who will be responsible for the host country's delivery of safety and security during the tournament, including with a strong focus on human rights-related topics based on FIFA requirements and international standards and best practice;
- the preparation of programmes to identify, mitigate and sanction homophobic, transphobic and other discriminatory incidents in the stadium, including through the three-step procedure and the Anti-Discrimination Monitoring System, which is already being implemented in all risk matches of the FIFA World Cup 2022 qualifiers in collaboration with the FARE network;
- initial steps in developing guidance for respectful intercultural exchange for all participants in the event;
- the identification of grievance channels and respective follow-up measures for all participants at the FIFA World Cup 2022, including LGBTI+ spectators and community members.

FIFA and the other tournament organisers have furthermore engaged with several stakeholders from the LGBTI+ community to discuss potential risks and the measures to address them. In particular, FIFA had initial engagements with the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA) and discussed the matter in consultations with several other human rights stakeholders as part of the sustainability strategy development. The Supreme Committee furthermore met repeatedly with Liverpool FC fan groups to discuss concerns of LGBTI+ fans who intended to travel to Qatar for the FIFA Club World Cup 2019.²⁹

After a first assessment and initial engagement with respective stakeholders after the FIFA Club World Cup 2019, FIFA and the other tournament organisers are not aware of discriminatory incidents against LGBTI+ fans or community members during the tournament. Furthermore, and as is standard practice at FIFA tournaments, FIFA and the other tournament organisers ensured that rainbow flags were allowed to be brought to and displayed in the stadiums.

²⁸ See: www.theguardian.com/football/2019/sep/26/alcohol-2022-football-world-cup-qatar.

²⁹ See: www.aljazeera.com/news/2019/11/liverpool-assured-lgbt-fans-club-world-cup-qatar-191104130751614.html.

FIFA and the other tournament organisers will continue to implement the various projects to ensure an inclusive tournament experience for all fans and community members. As part of these efforts, FIFA intends to intensify, structure and broaden the exchange with LGBTI+ organisations and fan groups in the coming months to deepen the understanding about ongoing concerns of LGBTI+ fans and ensure that measures taken are responsive these concerns.

Status update: implementation ongoing

R73. *FIFA should continue to engage through the SC with the Government communications Office, and publicly encourage, the finalization and implementation of a proposed new law to eliminate formal censorship in Qatar and seek to ensure media freedom and respect for journalists’ rights in connection with the FIFA World Cup 2022. (Third Advisory Board report, May 2019)*

Update from FIFA:

FIFA has repeatedly inquired about the status of the new media legislation since September 2018. The content of the draft law was sketched out in a newspaper article published in February 2019.³⁰ FIFA will continue to engage with the Qatari authorities on that topic to encourage the final adoption and publication of the proposed legislation.

Status update: implementation ongoing

R74. *The SC’s Accessibility Forum is a model of putting affected stakeholders at the heart of human rights impact identification, mitigation and accountability. FIFA should work together with the SC and LOC to apply the same principles to other areas of human rights risks management connected to the FIFA World Cup 2022 in connection with impacts affecting workers, players, volunteers and fans. (Third Advisory Board report, May 2019)*

Update from FIFA:

The SC has continued its approach of proactively and transparently engaging with local stakeholders in the areas of accessibility and workers’ welfare issues. Furthermore, the Supreme Committee engaged directly with LGBTI+ fans ahead of the FIFA Club World Cup 2019.

FIFA and Q22 are in the process of hiring a human rights manager based in Doha. One of the key task of the incumbent will be to strengthen engagement with potentially affected stakeholders on a range of additional human rights issues, building on the commitments agreed on as part of the development of the sustainability strategy.

Status update: implementation ongoing

³⁰ See: www.gulf-times.com/story/621369/Qatar-consolidates-freedom-of-media-with-draft-law.

(c) Discussions on a potential expansion

Overview and context

Throughout 2018 and in early 2019, FIFA discussed the option of expanding the FIFA World Cup Qatar 2022 from 32 to 48 teams. A technical feasibility study presented to the FIFA Council in March 2019 concluded that any such expansion would require the addition of one or several host countries in the region. The study identified Bahrain, Kuwait, Saudi Arabia, Oman and the United Arab Emirates as potential co-hosts. As a result, the FIFA Council instructed the FIFA administration to explore the possibility of an expansion.

Against the background of these discussions, the human rights advisory board shared a recommendation with FIFA, which has since been closed out.

Recommendation

R75. *In line with FIFA's existing human rights commitments, any final decision on involving additional hosts in an expanded FWC 2022 tournament should consider the following factors: (a) the results of a robust assessment of the specific human rights risks involved; (b) an evaluation of the likely impact of proposed mitigation measures to address those risks, given the unusually short time frame; (c) whether the prospective host government or governments have made clear, credible and timely commitments to address the specific human rights risks connected to hosting the tournament; and (d) an assessment of FIFA's ability to hold additional host governments to these commitments. (shared with FIFA in April 2019)*

Update from FIFA:

In April 2019, the FIFA administration developed an assessment of human rights risks associated with the potential expansion of the FIFA World Cup 2022 to either of the five countries under discussion and shared it with FIFA's leadership for their consideration. The assessment included the elements mentioned in the board's recommendation.

As part of the process, FIFA held bilateral video and telephone consultations with representatives of seven key external stakeholders. These included representatives from Amnesty International, BWI, the International Trade Union Confederation (ITUC), Human Rights Watch, the Centre for Sport and Human Rights, the Gulf Centre for Human Rights, and Football Supporters Europe. The assessment widely reflected the views expressed by these stakeholders.

In late May 2019, FIFA announced its decision not to expand the tournament.

Implementation update: recommendation implemented/closed out

2.2.3 Other event-related recommendations

Context and overview

The advisory board made three additional recommendations that are linked to but do not refer directly to the new bidding and hosting requirements or to the FIFA World Cup Qatar 2022. The issues covered are joint inspections with trade unions, employment structures on World Cup construction sites, and the integration of human rights into security arrangements. Implementation efforts are ongoing on all three recommendations.

Recommendations

R23. *Given the importance and value of joint inspections between FIFA, the relevant LOC, and international and (where they exist) local trade unions, such inspection programmes should be adopted as the norm for all future FIFA World Cup construction. (First Advisory Board report, September 2017)*

Update from FIFA:

Due to the positive experiences of joint inspections on FIFA World Cup construction sites in Russia and Qatar, and in line with the commitments of bidders for future tournaments, FIFA will consider such collaborations on construction sites for its future tournaments as a standard practice and will use its leverage with hosts and construction companies to be in a position to implement such programmes.

Status update: recommendation implemented/closed out

R47. *That FIFA conduct a joint review specifically of the MoU with BWI to identify lessons for the future on how to enhance cooperation in preventing and addressing harm to construction workers connected to FIFA World Cup tournaments. (Second Advisory Board report, September 2018)*

Update from FIFA:

This recommendation was made in relation to the engagement between FIFA and BWI in Russia. FIFA and BWI have separately published their conclusions from this engagement. During the reporting period, FIFA published a summary of its activities to address risks to workers involved in the stadium construction in Russia in the report on the sustainability strategy.³¹

A detailed joint review of the collaboration has not been a priority for BWI nor FIFA over the past two years. However, any future collaboration will be able to build on the lessons learned by the two organisations in Russia and of the ongoing collaboration between BWI and the SC in Qatar.

Status update: recommendation implemented/closed out

R26. *That FIFA promote a policy with host countries of direct employment of a majority of construction workers by the main contractors on FIFA World Cup-related sites. This should help reduce excessive reliance on subcontractors and the associated risks to workers', particularly migrant workers', human rights. The Board encouraged FIFA to engage with BWI to understand and explore ways to support BWI's efforts with various construction companies in Qatar to sign agreements to this effect as an example of good practice. (First Advisory Board report, September 2017)*

Update from FIFA:

FIFA recognises the value and importance of the board's recommendation and will explore the best ways to implement this recommendation on a case-by-case basis, taking into account the context in which it operates and will operate.

³¹ See <https://img.fifa.com/image/upload/ya7pgcyslpxplqmjkykg.pdf>.

With respect to Qatar, the Supreme Committee took several steps during the past two years to reduce risks related to suppliers in its supply chain. Firstly, it virtually eliminated third-tier contractors, enhancing the level of control and leverage over the companies operating on their sites. Secondly, it strengthened the requirements applied to recruitment processes as part of the selection of contractors for its sites.

Status update: implementation ongoing

R28. *That FIFA consider how best to use its leverage with regard to security arrangements associated with the hosting of football events, including in relation to police action that takes place away from the stadiums, by seeking to promote and encourage implementation by host governments of appropriate standards in line with its new commitment in its Human Rights Policy. (First Advisory Board report, September 2017)*

Update from FIFA:

For an overview of how FIFA integrates requirements concerning security and human rights into the tournament bidding and hosting process, as well as for an overview of the relevant activities implemented in relation to the FIFA World Cup Russia 2018™, see the update on this recommendation in the advisory board report of September 2018³² and the sustainability report on the FIFA World Cup Russia 2018.³³

During the reporting period, FIFA strengthened its collaboration with the Qatari authorities on the training of public security personnel (see also update on recommendation 72). FIFA also included respective requirements in the hosting arrangements with hosts of smaller tournaments chosen since September 2018, and the documentation required from the bidders for the FIFA Women's World Cup 2023.

In 2020, FIFA will engage closely on these topics with its Chinese counterparts in relation to the FIFA Club World Cup 2021.

Status update: implementation ongoing

³² See: <https://resources.fifa.com/image/upload/fifa-second-human-rights-advisory-board-report.pdf?cloudid=hwI34aljrosbxvkwvh> (pp. 61-62)

³³ See: <https://resources.fifa.com/image/upload/sustainability-strategy-for-the-2018-fifa-world-cup-2666950.pdf?cloudid=h0ysulsujvogspqmnbl> (pp. 43-45).

2.3 Recommendations related to FIFA's role in football governance

2.3.1 Member Associations

Context and overview

FIFA, as the international federation of football, has 211 member associations and recognises six regional confederations. In line with its human rights responsibilities and commitments, FIFA is committed to working with its member associations towards ensuring that they take responsibility concerning and steps towards respecting human rights under the UNGPs.

The work with member associations is a fast evolving part of FIFA's human rights work and FIFA has taken a number of steps to expand these efforts during the reporting period since September 2018. FIFA has, for example, strengthened the human rights-related components of the FIFA Forward 2.0 Programme regulations and the obligations of the beneficiaries (see update on recommendation 77). In all statutory revision processes in which FIFA was involved, FIFA also urged member associations to integrate a human rights commitment mirroring article 3 of the FIFA Statutes into their own regulations. Furthermore, FIFA strengthened its engagement with member associations on priority issues, including in particular child safeguarding and anti-discrimination (see update on recommendation 7). Finally, FIFA revised several regulations governing world football, such as its Code of Ethics and Disciplinary Code, with a view to enhance human rights protection within the scope of the respective codes (see chapter 3).

Four of the advisory board's recommendations fall within the scope of that work, and implementation is ongoing regarding all four recommendations. In line with the updates provided on the recommendations below, FIFA intends to further systematise and expand its guidance and support to help embed human rights across its member associations in the coming year.

Recommendations

- R7.** *That FIFA develop a strategy to drive deeper engagement with and outreach to its member associations on this topic, which have their own unique challenges in respecting human rights [Ruggie 2.7]. (First Advisory Board report, September 2017)*

Update from FIFA:

FIFA's approach to direct engagement with member associations on human rights topics currently focuses on priority areas. Since September 2018, FIFA has significantly expanded these efforts in a number of areas:

- FIFA created a new FIFA safeguarding and child protection programme within the FIFA Member Associations' Division and hired a child rights expert to lead the programme. Throughout 2019, FIFA developed the FIFA Guardians programme,³⁴ which was launched at an event in London on 10 July 2019.³⁵ The programme includes a practical toolkit for FIFA member associations to help raise safeguarding standards within football. FIFA plans to conduct a series of meetings and workshops in 2020 and beyond, together with the respective Confederations, to roll out training and education to start

³⁴ See: www.fifa.com/development/fifa-guardians/#web-07.

³⁵ See: www.youtube.com/watch?v=zTgGMhTU7yY.

embedding the topic throughout the 211 member associations. In October 2019, a new Department on Safeguarding and Child Protection was created within the FIFA Social Responsibility and Education Division, underlining FIFA's commitment to further strengthening its work in this field.

- FIFA further strengthened its bilateral engagements with three individual member associations on their policies and action plans regarding anti-discrimination in football. Based on these pilot projects, FIFA has standardised that approach and will continuously expand its efforts to assist other member associations who face important challenges with discrimination in football. Related to this development is also the revision of the FIFA Disciplinary Code, which now includes the development and implementation of a prevention plan as a possible sanction of member associations for their fans' discriminatory behaviour at international matches.³⁶
- FIFA also continued its efforts in collaboration with FIFPro, the international players' union, to develop national dispute resolution chambers (NDRCs) involving player representatives and footballing authorities.
- In addition, since September 2018, FIFA has integrated salient human rights topics in its infrastructure development workshops with member associations, including modules on labour rights and accessibility for disabled people or people with limited mobility.

FIFA recognises the potential of further strengthening the direct engagements with its member associations and confederations on human rights topics and is committed to stepping up its efforts in that respect under the newly created Social Responsibility & Education Division.

Status update: implementation ongoing

R76. *Given that the human rights commitment in Art 3 of the FIFA Statutes is included in the Standard Statutes that provide guidance but are not mandatory for Member Associations, the FIFA Administration should specifically push for the integration of this provision into Member Associations' own statutes, policies and governance structures and provide the necessary support to members to do so. (Third Advisory Board report, May 2019)*

Update from FIFA:

The FIFA standard statutes are the template used by FIFA in its engagements with member associations on statutory revision processes. Whenever an association undergoes a statutory revision process, FIFA therefore urges the association to integrate a human rights commitment in accordance with article 3. Since 2018, a total of 9 member associations have changed their statutes to integrate such a commitment with direct involvement of FIFA³⁷ and several additional associations are in the process of changing their statutes, and intending to include a human rights commitment.

As part of the work of the newly created FIFA Division on Social Responsibility and Education, FIFA intends to further step up its efforts to promote the uptake and embedding of human rights commitments in the governance structures and policies of its member associations.

Status update: implementation ongoing

³⁶ See: <https://resources.fifa.com/image/upload/fifa-disciplinary-code-2019-edition.pdf?cloudid=i8zsk8xws0pyl8uay9i> (art. 13).

³⁷ The MAs referred to are: Belize, Dominican Republic, Ghana, Indonesia, Latvia, Papua New Guinea, Peru, Tanzania, and Tunisia.

R77. *The Sustainability & Diversity Department should continue to work with the Member Associations Division to support their efforts to embed respect for human rights into the strategic plans for football development of individual Member Associations and into project proposals and accountability mechanisms for the FIFA Forward 2.0 program. (Third Advisory Board report, May 2019)*

Update from FIFA:

In January 2019, the new regulations on the FIFA Forward Programme (FIFA Forward 2.0) came into force. The new regulations require member associations to take steps with respect to human rights generally, and specifically mentions labour rights, anti-discrimination, diversity, accessibility and safeguarding.³⁸ Furthermore, FIFA Forward 2.0 enhances the investment in women's football development by the member associations.³⁹

For an overview of FIFA's approach to engaging with member associations on these topics, see the update on recommendation 7.

Status update: implementation ongoing

R63. *That FIFA's evolving approach to engaging confederations and member associations on the topic of human rights should include: (1) ongoing and repeated information on FIFA's own approach to preventing and addressing human rights risks, including concrete examples of action being taken; (2) integrating discussion of strategic human rights issues in meetings of the FIFA Council, the standing committees, and the Congress; (3) and routinely including specific human rights messages in high-profile speeches and publications by FIFA's leadership and senior staff. (Second Advisory Board report, September 2018)*

Update from FIFA:

As discussed in the above recommendations and the overview and context to this section, FIFA has continuously strengthened its engagement on human rights-related matters with member associations throughout the period covered by this report. Examples in that respect are for instance workshops with member associations on child safeguarding, labour rights in relation to infrastructure construction, and anti-discrimination. The FIFA administration also updated the FIFA Governance and Review Committee and the FIFA Audit and Compliance Committee on progress and challenges related to its human rights work. That said, FIFA recognises that there is considerable room to further develop this work and is committed to enhance its activities in that respect throughout the coming year.

Status update: implementation ongoing

³⁸ See: <https://resources.fifa.com/image/upload/1659-fifa-forward-development-programme-regulations-fifa-forward-2-0.pdf?cloudid=qdot1ebd3e4k9fmimmke> (art. 8.1 r, s, t).

³⁹ See: <https://www.fifa.com/about-fifa/what-we-do/fifa-forward-programme/>

2.3.2 Player-related recommendations

Context and overview

The reporting period saw important developments with respect to the rights of players. First and foremost, FIFA published its strategy for women's football in October 2018 and has since been working to further develop the women's game in line with the objectives set out in the strategy.⁴⁰ A key milestone in that respect was the successful FIFA Women's World Cup in France in June and July 2019. Furthermore, the FIFA Council in October 2019 decided to invest a total of USD 1 billion in the development of women's football for the period from 2019 to 2022.

Furthermore, throughout the reporting period, FIFA engaged with football stakeholders to discuss a comprehensive reform of the transfer system, including various areas of relevance to players' human rights, such as players' working conditions, the transfer of minors, the regulation of agents, and the enforcement of decisions by the respective FIFA bodies. To date, two reform packages have been adopted by the FIFA Council⁴¹ and discussions are ongoing on a number of areas.

Four of the board's recommendations concern player-related topics. The implementation on all of them is ongoing.

Recommendations

R55. *That, as part of the joint analysis under the bilateral agreement with FIFPro, FIFA expands upon the initial National Dispute Resolution Chamber pilots to analyse a wider range of existing football arbitration mechanisms from a human rights perspective, as well as with regard to FIFA's own standards on dispute resolution (including FIFA circulars 1010 and 1129). The analysis should explore how all players can have access to arbitration and dispute resolution mechanisms that are capable of taking account of internationally recognized human rights, including through the introduction of minimum contractual standards for players. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA is in continued discussions with FIFPro and other stakeholders on ways to strengthen national arbitration systems. As part of these efforts, FIFA and FIFPro are collaborating on the establishment of national dispute resolution chambers (NDRCs), building on the terms set out in circulars 1010 and 1129.⁴² To date, NDRCs were successfully established in Botswana, Panama, Malaysia and Indonesia and a number of additional projects are close to completion.

Status update: implementation ongoing

R56. *That FIFA engage with the Court of Arbitration for Sport (CAS) in making players' human rights a permanent issue on the agenda of CAS seminars to help build the capacity of CAS arbitrators to take into account internationally recognized human right standards. (Second Advisory Board report, September 2018)*

⁴⁰ For some key highlights in 2019, see: www.fifa.com/womens-football/news/2019-a-breakthrough-year-for-women-s-football.

⁴¹ See: <https://resources.fifa.com/image/upload/1679-amendments-june-and-october-2019.pdf?cloudid=yhpcqh0sjuzaccv1yrz> (on the regulatory changes based on the first reform package); and www.fifa.com/about-fifa/who-we-are/news/fifa-and-football-stakeholders-recommend-cap-on-agents-commissions-and-limit-on- (for the principles of the second package).

⁴² See: www.fifa.com/professional-football-department/professional-football-programs.html.

Update from FIFA:

FIFA has not yet taken concrete action upon this recommendation. However, it is committed to raise the topic of human rights in its exchanges with CAS at an appropriate moment in the coming months.

Status update: implementation not yet started

R57. *That FIFA ensure that players' human rights are appropriately considered in this review, in particular regarding: how the current rules affect minors (i.e. those under 18); how the rules may affect players' rights to work and to freedom of movement; and players' vulnerability to negative impacts through abusive practices by agents in the transfer market. The review should also pay particular attention to impacts that may be different, or more severe, for female players. (Second Advisory Board report, September 2018)*

Update from FIFA:

The topics mentioned in the Advisory Board recommendation are being reviewed as part of the reform process of the transfer system involving the relevant football stakeholders. While important steps have already been agreed upon, such as with the re-regulation of agents, reforms on other areas such as the protection of minors are still being discussed.⁴³

Status update: implementation ongoing

R58. *FIFA's planning, implementation, monitoring and evaluation of regulations on players' rights should take into consideration the specific situation of children, as far as they are affected by those regulations. FIFA's responses should be guided by the principles in the UN Convention on the Rights of the Child. (Second Advisory Board report, September 2018)*

Update from FIFA:

The situation of minors is a key component of the review process on the transfer regulations. The topic has been discussed in several rounds of engagements between the football stakeholders during the reporting period. These discussions are ongoing and FIFA is taking into consideration the UN Convention on the Rights of the Child in that process, including through engagements between FIFA's players' rights specialists and experts from UNICEF.

Status update: implementation ongoing

2.3.3 Individual cases

During the period covered by this report, the advisory board has shared formal recommendations with FIFA on two individual cases, which concerned the detention of Hakeem al-Araibi, a footballer who was detained in Thailand in November 2018, and the ongoing restrictions for Iranian women to access football matches in the country.

⁴³ See: <https://www.fifa.com/about-fifa/who-we-are/news/fifa-council-unanimously-appoints-china-pr-as-hosts-of-new-club-world-cup-in-202>

As discussed in more detail below, FIFA has taken a range of measures on both of these cases, contributing to the release of Mr al-Araibi in February 2019 and to significant progress on lifting the restrictions for women in Iran to access football stadiums.

a) Detention of Hakeem al-Araibi

Context and overview

Hakeem al-Araibi is a football player of Bahraini decent, who was granted refugee status in Australia and later gained Australian citizenship. On 27 November 2018, Mr al-Araibi was detained in Thailand and was held in prison under threat of return to Bahrain until his release on 11 February 2019 and subsequent return to Australia.

Starting in early December 2018, FIFA took a series of measures in an effort to help secure his release. This included public statements in his support, the first of which was issued to international media on 6 December. It also included regular engagements with the football associations of Australia, Thailand and Bahrain, as well as the AFC and interventions of a diplomatic nature, both public and non-public, with the authorities in the relevant countries. Throughout that period, FIFA was in close contact with representatives of the wider civil society campaign calling for Mr al-Araibi's release.

On 20 January 2019, the advisory board shared its recommendations with FIFA regarding additional steps in support of Mr al-Araibi.

Recommendations

R65a. *In line with FIFA's human rights responsibilities in its Statutes and Human Rights Policy, and building on the steps it had already taken, FIFA should use all available leverage to seek to ensure Mr Alaraibi's immediate and safe return to Australia, including by: (a) Immediately issuing a formal written communication to the Thai Government reiterating FIFA's position on Mr Alaraibi's case and stressing the urgency of resolving the situation by allowing him to safely return to Australia. The written communication should promptly be followed by an in-person visit by an appropriately high-level FIFA official (such as the Secretary-General or her Deputy). (shared with FIFA in January 2019)*

Update from FIFA:

On 24 January 2019, the FIFA Secretary-General sent a letter to the Prime Minister of Thailand, urging him to work to ensure Mr al-Araibi's release and calling for a meeting between high level officials of the Thai government and a delegation of FIFA and FIFPro to discuss the case. The letter and potential travel to Thailand was coordinated with FIFPro. The meeting did not take place until Mr al-Araibi's release on 11 February 2019.

Status update: recommendation implemented/closed out

R65b. *FIFA should use all available leverage to seek to ensure Mr Al-Araibi's immediate and safe return to Australia, including by ... (b) Similarly communicating FIFA's position and expectations formally to the Bahraini Government. (shared with FIFA in January 2019)*

Update from FIFA:

FIFA has had several engagements with the Bahraini authorities regarding Mr al-Araibi's case, both through the Bahrain Football Association and through direct high-level political interventions.

Status update: recommendation implemented/closed out

R65c. *FIFA should use all available leverage to seek to ensure Mr Al-Araibi's immediate and safe return to Australia, including by ... (c) Being prepared to have an appropriate FIFA representative attend any further in-person court hearings that Mr Alaraibi is entitled to, following the proactive approach taken by FIFA in Mr Semyon Simonov's case in Russia in 2018 in line with the organization's Human Rights Defenders Policy. (shared with FIFA in January 2019)*

Update from FIFA:

FIFA's Head of Sustainability & Diversity was present at Mr Al-Araibi's court hearing in Bangkok on 4 February 2019. Whilst in Thailand, FIFA also spoke with Mr Al-Araibi's representative, activists and diplomats of several countries involved in supporting Mr Al Araibi, and reaffirmed FIFA's call for Mr Al-Araibi's immediate release in comments to international media.

Status update: recommendation implemented/closed out

R65d. *FIFA should use all available leverage to seek to ensure Mr Al-Araibi's immediate and safe return to Australia, including by ... (d) Clearly communicating to the Asian Football Confederation (AFC) its institutional responsibility for respecting human rights as part of its obligation to comply and enforce compliance with FIFA's Statutes under Art 22. At a minimum, this responsibility means that: (1) the AFC should take a clear public position, aligned with FIFA's, on the need for a speedy and full resolution of the situation, which can only happen through Mr Alaraibi's safe return to Australia; (2) the AFC's highest officer, its President, who is also de facto a Vice-President of FIFA, should be prepared to state this position publicly and support it through quiet diplomacy, as is expected of all FIFA's senior officials. FIFA should clarify to the AFC that taking such a position is not in violation of the prohibition on political interference given FIFA's own human rights policy commitments, the gravity of potential harm to Mr Alaraibi, and the fact of his refugee status. (shared with FIFA in January 2019)*

Update from FIFA:

FIFA was in regular contact with the AFC General Secretariat and President regarding Mr Al Araibi's case between mid-December 2018 and early February 2019. This included exchanges on FIFA's position on the case as well as regarding efforts to resolve it through quiet diplomacy. The AFC published a statement in support of Mr Al-Araibi on 29 January 2019, in which it called for his release.

Status update: recommendation implemented/closed out

R65e. *FIFA should use all available leverage to seek to ensure Mr Al-Araibi's immediate and safe return to Australia, including by ... (e) Engaging directly with its three member associations, the Bahrain Football Association (BFA), the Football Association of Thailand (FAT) and the Football Federation of Australia (FFA) that are linked to Mr Alaraibi and thus also have a responsibility to seek to ensure his rights are respected. Mr Alaraibi is a player within the jurisdiction of the FFA, he is a former member of the BFA and his detention is occurring within the territory of the FAT. Each federation should use whatever leverage it has to support FIFA's efforts to seek to ensure Mr Alaraibi's safe return to Australia. (shared with FIFA in January 2019)*

Update from FIFA:

FIFA was in regular contact with all three member associations linked to Mr al-Araibi's case between mid-December 2018 and early February 2019. This included exchanges on FIFA's position on the case, as well on a number of particular steps taken by FIFA, such as requests for support in engaging with public authorities or documentation supporting Mr al-Araibi's case. It also included exchanges on FIFA's support for the measures taken by member associations in solidarity with Mr al-Araibi.

Status update: recommendation implemented/closed out

R65f. *The Review Committee of FIFA's Governance Committee should use its mandate in reviewing candidates for relevant FIFA elections to ask all candidates for their views on how they intend to meet their obligation to comply with art. 3 of FIFA's Statutes should they be elected. This should include the upcoming AFC Presidential elections. (shared with FIFA in January 2019)*

Update from FIFA:

The Review Committee uses the questionnaire set out in the FIFA Governance Regulations when asking candidates for information as part of an eligibility check. The responses to the questionnaire are one part of the information used by the Review Committee for its deliberation. No such additional question was integrated in the eligibility check of candidates for the AFC Presidential elections, which were already in the final phases at the time the recommendation was submitted to FIFA.

Status update: implementation ongoing

b) Discrimination against women in Iran

Context and overview

Iran is the only country where women's access to football matches is severely restricted. Starting with the FIFA President's visit to Iran in March 2018, FIFA has, over the past two years, significantly strengthened its efforts to help bring an end to the ban on Iranian women watching football games. During the meeting with FIFA President Gianni Infantino in March 2018, Hassan Rouhani, the President of the Islamic Republic of Iran promised that progress would be made on the matter soon.

Since then, FIFA has very regularly engaged with the Islamic Republic of Iran Football Federation (FFIRI) and with public authorities with a view to seeing this commitment implemented and to ensuring that women can buy tickets and access football games freely. Some signs of progress were seen in 2018. In June 2018, women were

allowed to enter the country's main stadium in Tehran for the screening of games played by the Iranian team at the FIFA World Cup in Russia. In November 2018, approximately 850 women attended the AFC Champions League final between the Iranian team Persepolis and the Japanese team Kashima Antlers. The advisory board made the below recommendation on this topic to FIFA in late 2018.

When progress seemed to stall in the first half of 2019, the FIFA President shared his concerns with the FFIRI. In his June 2019 letter, he urged the FFIRI and the authorities to make progress on the matter and asked for information on concrete steps to be shared with FIFA. Shortly after the letter was received by the Iranian authorities, the country's Minister of Sport announced that several thousand women would be able to attend the qualification games for the FIFA World Cup 2022, the first of which took place on 10 October 2019. A FIFA delegation travelled to Tehran in the weeks leading up to and on matchdays to work with the FFIRI on the operational implementation of the partial opening of the stadium to women. Approximately 4,500 women were able to buy tickets and attend the match on 10 October.

Throughout the process, FIFA has been very clear that it expects women to be able to attend all matches in Iran freely and that no limitation should be imposed on the number of tickets sold to women. FIFA thus views the match on 10 October 2019 as a step in the right direction but it expects additional steps to be taken. As per the statement of the FIFA President after the match on 10 October, there can be no way back and FIFA is working with the FFIRI to ensure the continuation of the process with respect to international and domestic league games.

Since October 2019, FIFA has continued the engagements with the FFIRI on both international and league matches, including through meetings in Tehran on 10 December 2019. In these exchanges, a FIFA delegation met with representatives of the FFIRI, the league and clubs, as well as of the Ministry of Youth and Sport, and discussed key objectives and milestones in the efforts towards a complete end of the stadium ban for women. FIFA will continue publishing updates on this process in the coming weeks and months.

Recommendations

R60. *FIFA should be explicit about the timeframe in which it expects its member association to align with FIFA's human rights expectations and the anticipated sanctions if it does not, including under the FIFA Statutes, Disciplinary Code and Ethics Code. This should also include using other aspects of FIFA's existing leverage, such as any decisions regarding upcoming tournaments where the Iranian Football Association is bidding since, by definition, this would pose challenges to FIFA meeting its own human rights responsibilities. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA has significantly stepped up its efforts to help bring an end to the stadium ban for women in Iran since 2018 (recognising the advisory board's report of September 2018 and additional comments on the matter in its May 2019 report). As part of that process, FIFA followed an approach of constructively engaging with the FFIRI to embark on a process of continued progress. This also includes setting and agreeing on specific time frames regarding expectations for progress.

FIFA has also been in regular contact with activists campaigning to bring an end to the stadium ban for women in Iran. Based on these exchanges, FIFA worked with several government and civil society entities to raise the need for the safety and security of these protesters.

It is understood by everyone involved that sanctions are part of the tools FIFA and the wider football community have at its disposal should progress on this matter stall. That said FIFA is confident that it will achieve its objectives through continued engagement with the FFIRI and the Iranian authorities and by offering FIFA's ongoing support and guidance.

Status update: Implementation ongoing

3. Protect and remedy

Pillar three of FIFA's human rights approach includes the work areas "protect" and "remedy". The area "protect" refers to FIFA's priority on efforts to protect human rights defenders who work to advance human rights in relation to FIFA's activities. The work area "remedy" refers to FIFA's responsibility under the UNGPs to provide for or cooperate in remediation where it may have caused or contributed to an adverse human rights impact, and FIFA's additional commitment as set out in its human rights policy to also promote remediation of adverse impacts that are otherwise linked to its activities.

Overview and context

Since the publication of the advisory board report of September 2018, FIFA's activities in relation to pillar three have focused on the integration of respective requirements and projects into the organisation of tournaments, addressing a number of high profile cases in world football and reflections on how FIFA can further strengthen systems on access to remedy and protection of human rights defenders in the world of football.

Three of the advisory board's recommendations refer to the protection of human rights defenders and remediation of human rights harm associated with FIFA's activities. One recommendation is being closed out and implementation is ongoing on the two remaining recommendations.

Recommendation

R10. *That FIFA identify predictable risks to the exercise of fundamental civil and political rights (such as freedom of expression, association and peaceful assembly) in connection with FIFA's tournaments and other events, including in connection with smaller tournaments and one-off meetings such as the Congress. FIFA should communicate its expectations to host governments in advance since this is likely to be a sensitive topic. (First Advisory Board report, September 2017)*

Update from FIFA:

FIFA requires bidders for its tournaments to identify and present plans to address risks to fundamental civil and political rights associated with FIFA's tournaments. Furthermore, respective requirements are integrated into the hosting requirements as well as government guarantees and commitments of tournament hosts. Since September 2017, such risks have been assessed by the bidders for the FIFA Women's World Cup 2023⁴⁴ and by the FIFA administration with respect to the potential expansion of the FIFA World Cup 2022.

Respect for fundamental freedoms and human rights-compliant policing more generally are furthermore integral parts of the training programme for Qatari security commanders responsible for the delivery of host-state security operations for the FIFA World Cup 2022 (see also update on recommendation 72). Fundamental civil and political rights are also a key part of the risk assessments undertaken with respect to FIFA's other upcoming tournaments, including the new FIFA Club World Cup, the FIFA Women's World Cup 2023, and the FIFA World Cup 2026 hosted by the US, Canada and Mexico.

Status update: implementation ongoing

⁴⁴ See: www.fifa.com/womens-football/news/fifa-women-s-world-cup-2023tm-four-bids-submitted.

R78. *In considering whether FIFA's Code of Ethics and Disciplinary Code remain fit for purpose, FIFA should specifically review the human rights implications of the current versions of both codes, and the operation of the grievance mechanisms established under them. Increasingly, cases brought to these mechanisms will involve human rights issues, so FIFA should ensure that the mechanisms are prepared to deal appropriately with them, in line with the criteria for operational-level grievance mechanisms in the UN Guiding Principles. (Third Advisory Board report, May 2019)*

Update from FIFA:

During the reporting period, FIFA amended both the FIFA Disciplinary Code and the FIFA Code of Ethics, including with respect to human rights-related provisions. Regarding the FIFA Disciplinary Code, FIFA amended the article on discrimination (art. 13) in June 2019. It now includes a more comprehensive definition of discrimination, in line with art. 4 of the FIFA Statutes. Furthermore, it establishes that the direct addressee of discriminatory behaviour may be invited to make an oral or written victim impact statement. In addition, the sanctions for discriminatory behaviour by fans now include the implementation of preventative measures.⁴⁵

FIFA has also included sexual abuse and exploitation as specific infringements in the June 2019 revision of the FIFA Code of Ethics in article 23 on the protection of physical and mental integrity.⁴⁶ That same revision also included a series of changes in view of strengthening due process, such as with respect to public hearings (art. 74), legal aid (art. 38bis), and the independence of the Ethics Committee (art. 34).

In an important step to strengthen the transparency of its legal proceedings, FIFA launched a dedicated website in October 2019, on which it publishes decisions of the FIFA legal bodies, including the FIFA Ethics Committee, the FIFA Disciplinary Committee and the FIFA Players' Status Committee.

During the period covered by this report, FIFA worked to address the case of sexual abuse against a number of players of the Afghanistan women's national team. This process comprises ethics proceedings against several people involved in violations of the FIFA Code of Ethics as well as a range of accompanying measures towards ensuring the protection and well-being of witnesses. FIFA is currently assessing how the lessons learnt from this case can help strengthen FIFA's systems and address human rights cases in world football, both within and outside the scope of FIFA's Ethics and Disciplinary proceedings.

Status update: implementation ongoing

R64. *That FIFA discuss with the Board the reasons for the regulation in Art. 36 of the Ethics Code and outline the scope for a review of its operation, in line with the recommendations made in the Brasseur report by the Council of Europe Parliamentary Committee on Culture, Science, Education and Media on Good Football Governance. (Second Advisory Board report, September 2018)*

⁴⁵ See: <https://resources.fifa.com/image/upload/1681-new-fifa-disciplinary-code-2019-edition.pdf?cloudid=os7adxtj00xfqw3kdpl3>.

⁴⁶ See: <https://resources.fifa.com/image/upload/1683-amendments-to-the-fifa-code-of-ethics-2019-edition.pdf?cloudid=qtot70lf3tbx0u0zdgp>.

Update from FIFA:

Article 36 of the FIFA Code of Ethics stipulates the requirements regarding confidentiality of ethics proceedings. The confidentiality of such proceedings is required given the need to ensure due process for everyone involved. Where appropriate, the regulations allow the investigatory chamber or the adjudicatory chamber to inform the public about or confirm ongoing or closed proceedings, and rectify information that is wrong or rumours. In December 2018, during the period covered by this report, FIFA confirmed, for instance, public reporting into allegations of sexual abuse against the President of the Afghanistan Football Federation.⁴⁷

In October 2019, FIFA, furthermore, took the significant step of publishing the detailed decisions of the Ethics Committee on a newly launched section of its website.⁴⁸

Status update: recommendation implemented/closed out

⁴⁷ See: www.theguardian.com/football/2018/nov/30/fifa-examining-claims-sexual-physical-abuse-afghanistan-womens-team.

⁴⁸ See: www.fifa.com/about-fifa/who-we-are/legal/.

4. Engage and communicate

The fourth pillar of FIFA's approach to human right as set out in FIFA's Human Rights Policy includes the two work areas "engage" and "communicate". They reflect FIFA's commitment to both transparency and accountability as two of the guiding principles enshrined in FIFA's strategy FIFA 2.0.⁴⁹

4.1. Stakeholder engagement

Overview and context

FIFA is strongly committed to engaging with its stakeholders in a proactive and constructive manner. Building on previous efforts in that respect, FIFA has further strengthened its engagement with human rights stakeholders since September 2018. This has included, for instance:

- collaborative efforts with human rights organisations and other stakeholders in addressing particular cases, such as the detention of Hakeem al-Araibi, the stadium ban for women in Iran, the case of sexual abuse in Afghan football, and on other less publicised cases;
- support for and regular engagement with the newly created Centre for Sport and Human Rights,⁵⁰ including as a member of the Centre's advisory council and through participation in several of its events;
- establishment of a FIFA Child Safeguarding Expert Working Group, which provided regular and practical guidance on the development of the FIFA Guardians policy and toolkit and continues to advise on the roll-out of FIFA's safeguarding programme, including the development of the training and education component of FIFA Guardians;
- continued issue-specific collaboration with the FARE network on anti-discrimination and with the Centre for Access to Football in Europe (CAFE) on accessibility, and with FIFPro on player-related matters;
- regular engagements with FIFA's key sponsorship partners through quarterly update calls on FIFA's human rights work and bilateral engagements regarding sponsors' activities in relation to the FIFA World Cup Qatar 2022;
- consultations with key stakeholders as part of particular processes, including the development of the sustainability strategy for the FIFA World Cup Qatar 2022, the baseline assessment on routes to remedy for individuals potentially affected by the FIFA World Cup Qatar 2022, the assessment of human rights risks associated with the potential expansion of the FIFA World Cup Qatar 2022, or the stocktaking assessment conducted by external experts on behalf of FIFA on the organisation's progress in implementing its human rights commitments since 2016.

FIFA recognises and greatly appreciates the input and support from external stakeholders to its human rights work. FIFA is fully committed to continuing and further systematising and strengthening these exchanges in the coming months and years, building on the good level of trust established with many stakeholders over the past years.

Two of the advisory board's recommendations are linked to FIFA's efforts to engage with external stakeholders. One of them is ongoing, the other has been closed out.

⁴⁹ See: https://resources.fifa.com/mm/document/affederation/generic/02/84/35/01/FIFA_2.0_Vision_LOW_neu.17102016_Neutral.pdf.

⁵⁰ See: www.sporhumanrights.org/.

Recommendations

R61. *That FIFA establish a systematic, annual dialogue with key stakeholders with insight into FIFA's human rights risks. This should be distinct from individual or event-specific stakeholder engagement and should help FIFA survey the horizon for new or emerging issues. FIFA should make the additional resources necessary available for such a process, ideally taking advantage of the planned review in 2019 of its salient human rights issues as an excellent opportunity to introduce this new approach. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA is committed to enhancing its ongoing dialogue with key stakeholders and to establishing a regular dialogue format with its key stakeholders, with an initial meeting planned in 2020.

Status update: implementation ongoing

R59. *That the FIFA safeguarding working group conduct a comprehensive stakeholder consultation (including with member associations, professional leagues, players' representatives and other stakeholders) to scope and define the responsibilities that member associations have for children (that is, those under 18) entering the game, and to identify and disseminate current good practices in ensuring children's rights are respected in this context. (Second Advisory Board report, September 2018)*

Update from FIFA:

FIFA has created a working group on safeguarding to advise FIFA on the development of its safeguarding programme. The group includes expert representatives from the Council of Europe, UNICEF, Safe Sports International, the Scottish FA, Concacaf and the OFC. The working group, including an expert member of the advisory board, has been instrumental in providing guidance and input on the development of the FIFA Guardians policy and toolkit and continues to advise FIFA on the development of the training and education programme and its roll-out at member association level together with the respective confederations. It is a key component of the FIFA Guardians toolkit that football associations engage with local child protection authorities, including UNICEF offices, NHRIs and civil society organisations in their efforts to develop policies and embed them in their structures.

FIFA will continue its engagement with external stakeholders in the field of children's rights, both through the Child Safeguarding Expert Working Group and through complementary engagements across FIFA's work such as the Football Stakeholders Committee and its ongoing work on regulations affecting children.

Status update: recommendation implemented/closed out

4.2. Communication

Overview and context

FIFA continues to communicate on a regular basis on its human rights work. Since September 2018, it started to take a more proactive approach in that respect, both regarding communication towards the public and with expert stakeholders.

With respect to public reporting, FIFA published the report on the implementation of the sustainability strategy for the FIFA World Cup Russia 2018,⁵¹ integrated human rights-related information into the organisation's overall activity report in October 2019 and published the sustainability strategy for the FIFA World Cup Qatar 2022.⁵²

Both of the advisory board's recommendations on this work area have been closed out.

Recommendations

R31. *That FIFA work with the relevant parties to make public further information on the design, operation and particularly the results of the construction site labour monitoring systems, including the joint inspections with trade unions, being conducted in Russia and Qatar in line with the Board's recommendations in Section 3 above. This is essential to build greater stakeholder trust in the work that is already being done, as well as plans to address remaining gaps and challenges. (First Advisory Board report, September 2017)*

Update from FIFA:

The Supreme Committee publishes regular updates on its monitoring work on stadium and training facility construction work in Qatar. Besides its own yearly progress reports, the SC also publishes joint reports on the monitoring system with BWI and the reports by the independent monitor Impactt Ltd.⁵³

Furthermore, FIFA has published additional information on the monitoring system it implemented jointly with the Local Organising Committee of the FIFA World Cup Russia 2018, BWI and the Russian trade union for construction workers RBWU in the report on the sustainability strategy implementation of the tournament.⁵⁴

Status update: recommendation implemented/closed out

R32. *That, where critical human rights issues arise in connection with its operations, it is important for FIFA to make prompt factual statements about its knowledge of the situation that can be shared with relevant expert and/or directly involved stakeholders, as well as with the wider public, in order to enable more effective responses and collaborative action where possible. (First Advisory Board report, September 2017)*

⁵¹ See: www.fifa.com/worldcup/news/sustainability-report-of-the-2018-fifa-world-cup-russia.

⁵² See: <https://www.fifa.com/about-fifa/who-we-are/news/fifa-and-hosts-qatar-present-first-ever-joint-fifa-world-cuptm-sustainability-st>.

⁵³ See: www.sc.qa/en/opportunities/workers-welfare/our-commitment/transparency.

⁵⁴ See: www.fifa.com/worldcup/news/sustainability-report-of-the-2018-fifa-world-cup-russia.

Update from FIFA:

FIFA has over the past years established trusted relationships with a wide range of stakeholders in the sports and human rights field, with which it engages to address urgent cases. Where deemed appropriate, this also includes sharing information on situations of particular concern in a proactive manner, both with such stakeholders or the wider public.

FIFA recognises that the full implementation of this recommendation requires ongoing and enhanced efforts by FIFA.

Status update: implementation ongoing

R62. *That FIFA should reach out to its partners – including future bidders and hosts – to agree on a transparent and proactive approach to communicating where severe negative impacts are connected to FIFA's operations. (Second Advisory Board report, September 2018)*

Update from FIFA:

The requirements for hosts include generic references to the need to communicate transparently on human rights-related efforts. For instance, hosts are asked to develop and implement a strategy that outlines how the host member association will communicate in a transparent manner how it will meet its obligations to respect all Internationally Recognised Human Rights in all aspects of its activities relating to the hosting and staging of the Competition in a transparent manner, providing sufficient information to build confidence and trust as well as to meet public interest expectations.

With respect to current relationships with hosts, FIFA works closely with its Qatari counterparts on communications related to human rights. The SC is thereby following an approach of remarkable transparency when communicating on its work regarding labour rights, including with respect to cases where serious negative impacts have occurred.

Status update: recommendation implemented/closed out

CONCLUSIONS AND OUTLOOK

This report provides an update on FIFA's human rights work in the areas covered by recommendations from the FIFA Human Rights Advisory Board. It discusses progress made between September 2018 and November 2019 and it outlines some of the steps planned in the coming months. An overview on the status of all recommendations is provided in the Annexes.

2020 will again be an eventful year for FIFA's human rights work. The creation of the new Social Responsibility & Education Division in September 2019 demonstrates FIFA's continued commitment to human rights and provides a number of opportunities to further strengthen these efforts. This will include the hiring of additional experts on human rights-related topics at FIFA's headquarters and in host-country entities responsible to deliver FIFA events, as well as a further enhanced effort to strategically embed human rights-related topics at the most senior organisational levels.

FIFA greatly appreciates the critical pro bono advice provided by the eight members of the independent FIFA Human Rights Advisory Board and looks forward to continuing that collaboration. The current mandate of the advisory board ends at the end of 2020 and FIFA will engage with the members of the board and other stakeholders in the coming months to consider and to agree on the next steps in this collaboration and FIFA's ongoing commitment to human rights.

FIFA also thanks the many stakeholders with which it engages in a collaborative manner to address human rights risks associated with its activities. As the work described in this report and beyond demonstrates, FIFA has become an integral and often leading part of the solution in ensuring respect and protection of human rights in sports. FIFA is fully committed to continuing to strengthen these efforts throughout the coming months and years.

ANNEXE: OVERVIEW OF RECOMMENDATIONS AND STATUS UPDATES⁵⁵

Source	Number	Recommendation	Status ⁵⁶
1 st Report September 2017	1(1a)	That FIFA strengthen the draft policy's language regarding the organization's expectations of governments that are hosting FIFA tournaments with regard to handling all security connected with the hosting of the event in line with international human rights standards, including by drawing on practical experience among governments and companies in implementing the Voluntary Principles on Security and Human Rights.	04 – recommendation implemented/ closed out
1 st Report September 2017	2(1b)	That FIFA reach out to additional stakeholders in the consultation process, in particular to relevant international trade union federations and individual member associations, in the latter case in order to build greater understanding of, and grass roots input to, FIFA's human rights commitments.	04 – recommendation implemented/ closed out
1 st Report September 2017	3(1c)	That the Administration align the policy's definition of human rights defenders with international standards and consider the range and type of defenders that could be adversely affected as FIFA works to implement the policy once adopted (see the Board's recommendation 3(d) below under "Identifying risks").	04 – recommendation implemented/ closed out
1 st Report September 2017	4(2a)	That FIFA continue developing a more strategic approach to embedding respect for human rights across the Administration, in particular by focusing on key staff that need specialized training or support in order to integrate human rights into their daily work, and developing indicators to measure the effectiveness of the training that staff receive [Ruggie 2.6].	02 – implementation ongoing
1 st Report September 2017	5(2b)	That FIFA review how it informs members of the various standing committees and the Council about FIFA's human rights responsibilities to ensure it includes appropriate information about Ruggie's report and recommendations [Ruggie 2.6]. The process should be fully reflective of FIFA's emerging policies and processes on human rights.	02 – implementation ongoing
1 st Report September 2017	6(2c)	That FIFA expand its current pool of stakeholders with insights into human and labor rights risks and establish more regular engagement with them [Ruggie 2.7].	04 – recommendation implemented/ closed out
1 st Report September 2017	7 (2d)	That FIFA develop a strategy to drive deeper engagement with and outreach to its member associations on this topic, which have their own unique challenges in respecting human rights [Ruggie 2.7].	02 – implementation ongoing
1 st Report September 2017	8(3a)	That FIFA prioritize its efforts to develop systems to more consistently identify the greatest risks to people affected by FIFA's activities and business relationships, especially where actual harm has occurred or may be imminent or where access to remedy is needed.	02 – Implementation ongoing
1 st Report September 2017	9(3b)	That the Administration's comprehensive mapping exercise to identify salient human rights issues should be tested with informed stakeholders who can validate and/or challenge the findings. The Advisory Board intends to provide more specific comments as the process moves forward.	04 – recommendation implemented/ closed out
1 st Report September 2017	10(3c)	That FIFA identify predictable risks to the exercise of fundamental civil and political rights (such as freedom of expression, association and peaceful assembly) in connection with FIFA's tournaments and other events, including in connection with smaller tournaments and one-off meetings such as the Congress. FIFA should communicate its expectations to host governments in advance since this is likely to be a sensitive topic.	03 – Implementation at an advanced stage
1 st Report September 2017	11(3d)	That the Administration give urgent attention to the need to have clear channels in place through which human rights defenders, journalists and others who are at risk of severe harm (such as arbitrary detention or arrest) in connection with FIFA's tournaments or other events can safely raise concerns, in line with its commitment in its new Human Rights Policy. Prompt responses to such risks are necessary to prevent an escalation of harm to those affected. There is a particular urgency to ensure such systems are in place in the lead up to the 2018 FIFA World Cup as this will be the first major test of FIFA's new policy commitment.	04 – recommendation implemented/ closed out

⁵⁵ This list includes all recommendations made by the board since its inception in early 2017 and is not limited to the open ones on which updates are provided in the present report.

⁵⁶ The status updates are agreed on between FIFA and the board and include four categories: 01 – implementation not yet started; 02 – implementation ongoing; 03 – implementation at an advanced stage; 04 – recommendation implemented/closed out.

Source	Number	Recommendation	Status ⁵⁶
1 st Report September 2017	12(3e)	That, as a priority, FIFA support a thorough examination of the root causes of all fatalities and other serious injuries to date, as well as an analysis of health and safety risks in the final phases of construction through the end of 2017 (and potentially into early 2018) in order to help prevent the most severe risks to workers. Assessments of root causes, and of the monitoring system's overall effectiveness in addressing the most severe risks to workers, should involve all the parties to the MoU.	04 – recommendation implemented/ closed out
1 st Report September 2017	13(3f)	That FIFA proactively engage with the LOC whenever severe impacts on workers occur on how leverage can best be used, including with the relevant stadium developers, to ensure appropriate follow up measures. Such measures should include the application of appropriate sanctions on the responsible parties as well as forward-looking steps to prevent the impacts from recurring.	04 – recommendation implemented/ closed out
1 st Report September 2017	14(3g)	That FIFA collaborate closely in all instances where deaths or serious injuries have occurred not only with the LOC but also with BWI (and RBWU as appropriate) on follow up measures.	04 – recommendation implemented/ closed out
1 st Report September 2017	15(3h)	That FIFA engage with the LOC, BWI and RBWU to make at least summary observations from the monitoring system public, including follow up actions to address non-compliances, and to ensure that the monitoring system is capturing disaggregated data about impacts on migrant workers going forwards. That FIFA raise with the LOC the need to ensure that the main contractors have appropriate health and safety plans and training programs in place when workers are operating at heights as construction advances to the final stages and the nature of the risks to workers changes.	04 – recommendation implemented/ closed out
1 st Report September 2017	16(3h+)	That FIFA raise with the LOC the need to ensure that the main contractors have appropriate health and safety plans and training programs in place when workers are operating at heights as construction advances to the final stages and the nature of the risks to workers changes.	04 – recommendation implemented/ closed out
1 st Report September 2017	17(3i)	That FIFA raise with the LOC the need to ensure that the main contractors ensure that all workers in the stadia are provided with adequate health care as well as timely compensation in the event of any injuries.	04 – recommendation implemented/ closed out
1 st Report September 2017	18(3j)	That FIFA support the SC and BWI's discussions on the potential for greater synergies between the various parts of the labor inspection system and the extent to which they ensure appropriate consideration of the overall health of workers – ie, both on site and in accommodations in a connected way – given the extremely challenging physical environment for workers.	04 – recommendation implemented/ closed out
1 st Report September 2017	19(3k)	That FIFA engage with the SC to ensure that the Workers' Welfare Standards continue to be reviewed periodically and further updated to reflect feedback from stakeholders consulted as part of that process.	04 – recommendation implemented/ closed out
1 st Report September 2017	20(3l)	That FIFA engage with the SC to encourage the renewal of the SC's current agreement with BWI in December 2017 and the potential to extend the scope of the joint inspections to cover sub-contractors directly. FIFA should also explore with the SC the progressive expansion of the coverage of the joint inspections to look at other risks to workers' human rights that could add value to the existing four-tier system.	04 – recommendation implemented/ closed out
1 st Report September 2017	21(3m)	That FIFA engage with the SC, together with BWI, on the importance of consulting and involving workers directly in health and safety on the worksite beyond current efforts to strengthen health and safety reporting, including through mechanisms such as worker-management health and safety committees and, given the absence of local trade unions, through worker-elected representatives.	04 – recommendation implemented/ closed out
1 st Report September 2017	22(3n)	That FIFA actively explore ways to use its leverage to engage with the host government about the impact of the kafala system on migrant workers involved in World Cup-related construction.	03 – Implementation at an advanced stage
1 st Report September 2017	23(3o)	That, given the importance and value of joint inspections between FIFA, the relevant LOC, and international and (where they exist) local trade unions, such inspection programs should be adopted as the norm for all future FIFA World Cup construction.	04 – recommendation implemented/ closed out

Source	Number	Recommendation	Status ⁵⁶
1 st Report September 2017	24(4a)	That, in order to strengthen FIFA's leverage in future tournaments and ensure better protection of workers' rights, FIFA should include respect for international labour rights standards, including specific occupational health and safety requirements for the construction phase, in the Stadium Agreement for host countries in the bidding documentation. This should include incorporating references to accepted standards such as the FIDIC's Standard Bidding Documents for Procurement of Construction Works and General Conditions of Contract for Construction, ²⁹ and the ILO Code of Practice on Safety and Health in Construction.	04 – recommendation implemented/ closed out
1 st Report September 2017	25(4b)	That, building on the experience of implementing the Workers' Welfare Standards in Qatar, FIFA should make clear with respect to all its events that it is unacceptable for migrant workers to be burdened with recruitment fees and should engage with the relevant local actors to promote responsible recruitment and employment practices by all contractors and sub-contractors in line with leading international practice.	04 – recommendation implemented/ closed out
1 st Report September 2017	26(4c)	That FIFA promote a policy with host countries of direct employment of a majority of construction workers by the main contractors on FIFA World Cup-related sites. This should help reduce excessive reliance on sub-contractors and the associated risks to workers', particularly migrant workers', human rights. The Board encouraged FIFA to engage with BWI to understand and explore ways to support BWI's efforts with various construction companies in Qatar to sign agreements to this effect as an example of good practice.	02 – implementation ongoing
1 st Report September 2017	27(4d)	That FIFA should be actively encouraging other companies linked to FIFA World Cup-related construction in host countries, such as major hotel companies, to support respect for international labour rights standards, as well as the adoption of independent labour monitoring practices, in connection with their operations. Good practices developed by FIFA and its local partners in specific contexts should be shared with a wider audience in the long-term interests of workers and the FIFA World Cup brand.	02 – implementation ongoing
1 st Report September 2017	28(4e)	That FIFA consider how best to use its leverage with regard to security arrangements associated with the hosting of football events, including in relation to police action that takes place away from the stadiums, by seeking to promote and encourage implementation by host governments of appropriate standards in line with its new commitment in its Human Rights Policy.	02 – implementation ongoing
1 st Report September 2017	29(4f)	That the administration review the Procurement White Paper published by the Mega Sporting Events Human Rights Platform which captures common issues and concerns related to procurement activities associated with major sporting events with a view to identifying relevant steps for FIFA to incorporate.	04 – recommendation implemented/ closed out
1 st Report September 2017	30(5a)	That FIFA publish more information on its anti-discrimination approach in order to both share the positive outcomes it has achieved through engagement with member associations, as well as ongoing challenges.	04 – recommendation implemented/ closed out
1 st Report September 2017	31(5b)	That FIFA work with the relevant parties to make public further information on the design, operation and particularly the results of the construction site labour monitoring systems, including the joint inspections with trade unions, being conducted in Russia and Qatar in line with the Board's recommendations in Section 3 above. This is essential to build greater stakeholder trust in the work that is already being done, as well as plans to address remaining gaps and challenges.	04 – recommendation implemented/ closed out
1 st Report September 2017	32(5c)	That where critical human rights issues arise in connection with its operations, it is important for FIFA to make prompt factual statements about its knowledge of the situation that can be shared with relevant expert and/or directly involved stakeholders, as well as with the wider public, in order to enable more effective responses and collaborative action where possible.	02 – implementation ongoing
1 st Report September 2017	33(6a)	That FIFA prioritise those elements of the Board's recommendations above regarding the 2018 and 2022 FIFA World Cups in Russia and Qatar that involve using its leverage to seek to ensure effective remedy is provided by the responsible parties to construction workers harmed in connection with the construction or upgrading of the various stadiums and other World Cup facilities.	04 – recommendation implemented/ closed out
1 st Report September 2017	34(6b)	That FIFA continue to engage directly with BWI regarding efforts in both Russia and Qatar to strengthen the effectiveness of existing grievance mechanisms for workers, and seek BWI's views on new mechanisms where relevant, in order to benefit from BWI's expertise.	04 – recommendation implemented/ closed out

Source	Number	Recommendation	Status ⁵⁶
Recommendations December 2017	35	That, building on recommendations 3(e) and 3(h) from the Board's first report, and following discussions with the other MOU parties, FIFA should be transparent about the actual number of fatalities on 2018 FIFA World Cup construction sites and, to the greatest extent possible, the results of all investigation reports.	04 – recommendation implemented/ closed out
Recommendations December 2017	36	That, building on recommendation 3(g) from the Board's first report, FIFA should take a more proactive stance on investigations of fatalities and should use its leverage, together with the LOC, to directly engage the main contractors to seek to ensure that they are providing an adequate response. Where they are not, FIFA should look at how appropriate assistance and support can be provided to families of the victims by the LOC in the first instance.	04 – recommendation implemented/ closed out
Recommendations December 2017	37	That, building on recommendations 3 (f) and 3(i - renumbered) from the Board's first report, FIFA should use its leverage to help ensure that comprehensive health and safety measures are put in place to prevent major accidents, particularly on work at heights, by working closely with the LOC and engaging with all relevant parties, including the responsible contractors, the government and the parties to the MOU. These should include strict compliance with the health and safety measures pertaining to scaffolding, tower crane operations and harness management, including "near misses". In addition, site inspections should be more frequent and focus on stadium sites with bad health and safety records and those that would pose the most serious dangers to workers.	04 – recommendation implemented/ closed out
Recommendations December 2017	38	That FIFA should seek, together with the LOC, to proactively identify a solution to address any delayed or unpaid wages, especially for migrant workers, given the predictability of this risk from past major sporting events in the country. FIFA should engage proactively, together with the LOC, with stadium owners and the main contractors on how they will meet their responsibility to ensure workers have received a fair wage, including the payment of promised bonuses as well as payments to those who have already finished work on the construction sites.	04 – recommendation implemented/ closed out
Recommendations December 2017	39	That FIFA should require contractors for future tournaments to use a wage structure that provides for a fair wage and is set out clearly in written contracts, as part of its expectations of good practice in construction.	04 – recommendation implemented/ closed out
Recommendations December 2017	40	That FIFA commit to applying maximum leverage with the government in cases of harassment, intimidation and/or detention of human rights defenders for exercising their full range of rights, including freedom of expression (also on-line) and assembly. FIFA should also commit to engaging with the government to secure the prompt release of detained human rights defenders and to alleviate any restrictions imposed on them by the authorities in the performance of their role.	04 – recommendation implemented/ closed out
Recommendations December 2017	41	That FIFA start as early as possible to inform Member Associations, national media and its own business partners (especially TV broadcasters and sponsors) about its system for protecting human rights defenders, including developing briefings in different languages and helping to educate the staff of the LOC, volunteers and others that will be crucial local points of contact about the system.	04 – recommendation implemented/ closed out
Recommendations December 2017	42	That FIFA be as transparent as possible (with due regard to relevant personal and data protection rights) in relation to its investigations into the potential involvement of Russian players and other individuals or institutions in the "systemic manipulation" identified by the Schmid Commission; that FIFA proactively publish the steps it has taken in this investigation; and that FIFA make clear to its Russian counterparts that FIFA supports a fair and just procedure to uncover any misconduct that may have caused harm to the integrity of sport.	04 – recommendation implemented/ closed out
Recommendations December 2017	43	That FIFA immediately explore the feasibility of offering the Egyptian team an alternative location, including financial support to do so;	04 – recommendation implemented/ closed out
Recommendations December 2017	44	That FIFA urgently communicate to the Egyptian Football Association the seriousness of the human rights risks that concerned stakeholders have raised with FIFA and FIFA's policy commitment to respect and protect human rights defenders;	04 – recommendation implemented/ closed out
Recommendations December 2017	45	That FIFA urgently communicate to the LOC that concerned stakeholders have raised the situation of specific human rights defenders in Chechnya with FIFA, that this is an illustration of the broader human rights issues that FIFA has been discussing with the LOC as a priority concern, and that FIFA urges the LOC to use all possible leverage to follow up with the responsible government entities to seek to ensure those individuals' freedom;	04 – recommendation implemented/ closed out

Source	Number	Recommendation	Status ⁵⁶
Recommendations December 2017	46	That, in the absence of an ability to relocate the team, FIFA should promptly complete a formal human rights risk assessment of the use of Grozny as a location for a team base camp, drawing on independent expert advice and then take the mitigation steps developed through that process.	04 – recommendation implemented/ closed out
Second Report September 2018	47	That FIFA conduct a joint review specifically of the MoU with BWI to identify lessons for the future on how to enhance cooperation in preventing and addressing harm to construction workers connected to FIFA World Cup tournaments.	04 – recommendation implemented/ closed out
Second Report September 2018	48	That evidence of bidders' ability to assess and manage human rights risks is comprehensively taken into account by all levels of the organisation in the FIFA World Cup 2026 decision-making process.	04 – recommendation implemented/ closed out
Second Report September 2018	49	That FIFA reflect on how integrating human rights into the FIFA World Cup bidding process worked and share its conclusions publicly, including how it could further strengthen the process in future, in part so that other sports organisations now embarking on a similar path can benefit from its experience.	02 – implementation ongoing
Second Report September 2018	50	That FIFA engage with the SC to promptly bring in recognized global experts to independently assess the heat stress index being used and the trigger points for remedial action, preferably during a joint SC-BWI inspection.	04 – recommendation implemented/ closed out
Second Report September 2018	51	That FIFA engage and support the SC in identifying how the implementation of current and additional mechanisms to address the risk of heat stress can be further strengthened in the areas of: safety training for workers and their supervisors (for example, in identifying early warning signs of heat exhaustion); ensuring proper rest periods, regular intake of fluids and proper application of PPE; modifying targets and work rates to reduce physical exertion and scheduling heavy or strenuous work for cooler times of the day; and improving on-site cooling devices for workers.	04 – recommendation implemented/ closed out
Second Report September 2018	52	That FIFA support the SC in tracking the implementation of recommendations in the SC-BWI Joint Working Group that highlighted the need to synchronize clinic records and provide clinical staff at the accommodation centres with occupational health awareness training and to link the medical screening of workers, and their general health and wellbeing, with the assessment of occupational risks at the construction sites. This includes the identification and consideration of any underlying (i.e. chronic) or current medical conditions that may impact fitness to work or the assignment of work duties.	04 – recommendation implemented/ closed out
Second Report September 2018	53	That FIFA engage with the SC to help ensure that it is reviewing and aligning its efforts on protection of workers' rights with the commitments outlined in the ILO technical cooperation agreement with the Government of Qatar.	04 – recommendation implemented/ closed out
Second Report September 2018	54	That FIFA continue to support the renewed MOU between BWI and the SC.	04 – recommendation implemented/ closed out
Second Report September 2018	55	That, as part of the joint analysis under the bilateral agreement with FIFPro, FIFA expands upon the initial National Dispute Resolution Chamber pilots to analyse a wider range of existing football arbitration mechanisms from a human rights perspective, as well as with regard to FIFA's own standards on dispute resolution (including FIFA circulars 1010 and 1129). The analysis should explore how all players can have access to arbitration and dispute resolution mechanisms that are capable of taking account of internationally recognized human rights, including through the introduction of minimum contractual standards for players.	02 – implementation ongoing
Second Report September 2018	56	That FIFA engage with the Court of Arbitration for Sport (CAS) in making players' human rights a permanent issue on the agenda of CAS seminars to help build the capacity of CAS arbitrators to take into account internationally recognized human right standards.	01 – implementation not yet started
Second Report September 2018	57	That FIFA ensure that players' human rights are appropriately considered in this review, in particular regarding: how the current rules affect minors (i.e. those under 18); how the rules may affect players' rights to work and to freedom of movement; and players' vulnerability to negative impacts through abusive practices by agents in the transfer market. The review should also pay particular attention to impacts that may be different, or more severe, for female players.	02 – implementation ongoing

Source	Number	Recommendation	Status ⁵⁶
Second Report September 2018	58	That FIFA's planning, implementation, monitoring and evaluation of regulations on players' rights should take into consideration the specific situation of children, as far as they are affected by those regulations. FIFA's responses should be guided by the principles in the UN Convention on the Rights of the Child.	02 – implementation ongoing
Second Report September 2018	59	That the FIFA safeguarding working group conducts a comprehensive stakeholder consultation (including with member associations, professional leagues, players' representatives and other stakeholders) to scope and define the responsibilities that member associations have for children (that is, those under 18) entering the game, and to identify and disseminate current good practices in ensuring children's rights are respected in this context.	04 – recommendation implemented/ closed out
Second Report September 2018	60	That FIFA should be explicit about the timeframe in which it expects its Member Association to align with FIFA's human rights expectations and the anticipated sanctions if it does not, including under the FIFA Statutes, Disciplinary Code and Ethics Code. This should also include using other aspects of FIFA's existing leverage, such as any decisions regarding upcoming tournaments where the Iranian Football Association is bidding since, by definition, this would pose challenges to FIFA meeting its own human rights responsibilities.	02 – implementation ongoing
Second Report September 2018	61	That FIFA establish a systematic, annual dialogue with key stakeholders with insight into FIFA's human rights risks. This should be distinct from individual or event-specific stakeholder engagement and should help FIFA survey the horizon for new or emerging issues. FIFA should make the additional resources necessary available for such a process, ideally taking advantage of the planned review in 2019 of its salient human rights issues as an excellent opportunity to introduce this new approach.	02 – implementation ongoing
Second Report September 2018	62	That FIFA should reach out to its partners – including future bidders and hosts – to agree on a transparent and proactive approach to communicating where severe negative impacts are connected to FIFA's operations.	04 – recommendation implemented/ closed out
Second Report September 2018	63	That FIFA's evolving approach to engaging confederations and member associations on the topic of human rights should include: (1) ongoing and repeated information on FIFA's own approach to preventing and addressing human rights risks, including concrete examples of action being taken; (2) integrating discussion of strategic human rights issues in meetings of the FIFA Council, the standing committees, and the Congress; (3) and routinely including specific human rights messages in high-profile speeches and publications by FIFA's leadership and senior staff.	02 – implementation ongoing
Second Report September 2018	64	That FIFA discuss with the Board the reasons for the regulation in Art. 36 of the Ethics Code and outline the scope for a review of its operation, in line with the recommendations made in the Basseur report by the Council of Europe Parliamentary Committee on Culture, Science, Education and Media on Good Football Governance.	04 – recommendation implemented/ closed out
January 2019	65a	In line with FIFA's human rights responsibilities in its Statutes and Human Rights Policy, and building on the steps it had already taken, FIFA should use all available leverage to seek to ensure Mr Alaraibi's immediate and safe return to Australia, including by: Immediately issuing a formal written communication to the Thai Government reiterating FIFA's position on Mr Alaraibi's case and stressing the urgency of resolving the situation by allowing him to safely return to Australia. The written communication should promptly be followed by an in-person visit by an appropriately high-level FIFA official (such as the Secretary-General or her Deputy) to Thailand to engage directly with relevant Thai government officials in order to communicate FIFA's concern and seek the government's assistance in ensuring a speedy resolution. FIFA's representative should also meet directly with Mr Alaraibi's representatives.	04 – recommendation implemented/ closed out
January 2019	65b	Similarly communicating FIFA's position and expectations formally to the Bahraini Government.	04 – recommendation implemented/ closed out
January 2019	65c	Being prepared to have an appropriate FIFA representative attend any further in-person court hearings that Mr Alaraibi is entitled to, following the proactive approach taken by FIFA in Mr Semyon Simonov's case in Russia in 2018 in line with the organization's Human Rights Defenders Policy	04 – recommendation implemented/ closed out

Source	Number	Recommendation	Status ⁵⁶
January 2019	65d	Clearly communicating to the Asian Football Confederation (AFC) its institutional responsibility for respecting human rights as part of its obligation to comply and enforce compliance with FIFA's Statutes under Art 22. At a minimum, this responsibility means that: (1) the AFC should take a clear public position, aligned with FIFA's, on the need for a speedy and full resolution of the situation, which can only happen through Mr Alaraibi's safe return to Australia; (2) the AFC's highest officer, its President, who is also de facto a Vice-President of FIFA, should be prepared to state this position publicly and support it through quiet diplomacy, as is expected of all FIFA's senior officials. FIFA should clarify to the AFC that taking such a position is not in violation of the prohibition on political interference given FIFA's own human rights policy commitments, the gravity of potential harm to Mr Alaraibi, and the fact of his refugee status.	04 – recommendation implemented/ closed out
January 2019	65e	Engaging directly with its three member federations, the Bahrain Football Association (BFA), the Football Association of Thailand (FAT) and the Football Federation of Australia (FFA) that are linked to Mr Alaraibi and thus also have a responsibility to seek to ensure his rights are respected. Mr Alaraibi is a player within the jurisdiction of the FFA, he is a former member of the BFA and his detention is occurring within the territory of the FAT. Each federation should use whatever leverage it has to support FIFA's efforts to seek to ensure Mr Alaraibi's safe return to Australia.	04 – recommendation implemented/ closed out
January 2019	65f	The Review Committee of FIFA's Governance Committee should use its mandate in reviewing candidates for relevant FIFA elections to ask all candidates for their views on how they intend to meet their obligation to comply with Art 3 of FIFA's Statutes should they be elected. This should include the upcoming AFC Presidential elections.	02 – implementation ongoing
Third report May 2019	66	FIFA should encourage the convening of, and participate in, a discussion by the ILO and Qatari Government on the creation of a shared set of labor standards across all construction projects in the country. The standards should draw on the elements of existing worker welfare standards and practice in the country that are most closely aligned with international human rights, and FIFA should publicly endorse the Ministry of Labor playing a central role in setting and meaningfully enforcing such standards.	02 – implementation ongoing
Third report May 2019	67	FIFA should promote the learning from the model of worker committees developed by the SC with support from BWI as a key input to the Ministry of Labor's review and development of joint committees as part of the Qatari Government's technical cooperation program with the ILO. This should include key features of the SC's model such as meetings that are independent of management, free worker elections, training for worker representatives and ensuring the committees have the scope to discuss all relevant topics including wages and benefits. FIFA should also support the SC in promoting its model directly with the other companies involved in connected construction projects that come within the scope of the FWC 2022 Sustainability Strategy.	04 – recommendation implemented/ closed out
Third report May 2019	68	FIFA should demonstrate how it has used its leverage to help enable remedy for the affected workers in the Mercury MENA case, including through advocating with the Qatari Government for the effective operationalization of the Workers' Support and Insurance Fund. This should include ensuring that the fund is able to cover future emergency payments as well as compensation for unpaid salaries in this and similar cases, that it is established with initial funding by the government and that it is retroactive for at least a year.	03 – implementation at an advanced stage
Third report May 2019	69	FIFA should support a discussion involving all the key actors in the construction sector in Qatar, convened by an independent party such as the ILO, with the aim of generating broader understanding of the factors that appear to be contributing to a number of 'non-work-related deaths' among construction workers (including the physical environment, nutrition, and underlying chronic health conditions), the relationships between those factors, and what more can be done to address them. The discussion should involve concerned stakeholders and independent experts in order to define appropriate actions and measurable outcomes.	02 – implementation ongoing
Third report May 2019	70	FIFA should promote the effective implementation of the law abolishing exit permits, its extension to all migrant workers in the country, and support for the implementation of free labor mobility (meaning the ability to change employers) by late 2019 in its high-level exchanges with the Qatari Government. These are critical issues that go beyond the scope of operations of FIFA's partner, the SC, and which will affect the rights of many workers connected to the FWC 2022 in the construction, transportation, hotel and services sectors.	03 – implementation at an advanced stage

Source	Number	Recommendation	Status ⁵⁶
Third report May 2019	71	FIFA should use the opportunity of the study it has commissioned on access to remedy in relation to the FWC 2022 to explore how FIFA can support the emerging system of community liaison representatives from global trade unions sitting within the ILO's Qatar office to try to address cases involving harm to workers at an early stage before they escalate and the harm suffered by the workers is compounded.	02 – implementation ongoing
Third report May 2019	72	FIFA build on the work that has been done to date with the SC's security team to look more comprehensively at risks to individuals due to their actual or perceived sexual orientation or gender identity in connection with the hosting of the tournament. This should go beyond international fans and also consider members of the local community who may face even greater threats. FIFA should conduct its own engagement with groups with insight into the perspectives of LGBT+ individuals and deepen its engagement with the SC on this topic, in order to develop credible mitigation measures and help build stakeholder confidence in how these risks will be handled.	02 – implementation ongoing
Third report May 2019	73	FIFA should continue to engage through the SC with the Government communications Office, and publicly encourage, the finalization and implementation of a proposed new law to eliminate formal censorship in Qatar and seek to ensure media freedom and respect for journalists' rights in connection with the FIFA World Cup 2022.	02 – implementation ongoing
Third report May 2019	74	The SC's Accessibility Forum is a model of putting affected stakeholders at the heart of human rights impact identification, mitigation and accountability. FIFA should work together with the SC and LOC to apply the same principles to other areas of human rights risks management connected to the FIFA World Cup 2022 in connection with impacts affecting workers, players, volunteers and fans.	02 – implementation ongoing
April 2019	75	In line with FIFA's existing human rights commitments, any final decision on involving additional hosts in an expanded FWC 2022 tournament should consider the following factors: (a) the results of a robust assessment of the specific human rights risks involved; (b) an evaluation of the likely impact of proposed mitigation measures to address those risks, given the unusually short time frame; (c) whether the prospective host government or governments have made clear, credible and timely commitments to address the specific human rights risks connected to hosting the tournament; and d) an assessment of FIFA's ability to hold additional host governments to these commitments.	04 – recommendation implemented/ closed out
Third report May 2019	76	Given that the human rights commitment in Art 3 of the FIFA Statutes is included in the Standard Statutes that provide guidance but are not mandatory for Member Associations, the FIFA Administration should specifically push for the integration of this provision into Member Associations' own statutes, policies and governance structures and provide the necessary support to members to do so.	02 – implementation ongoing
Third report May 2019	77	The Sustainability and Diversity Department should continue to work with the Member Associations Division to support their efforts to embed respect for human rights into the strategic plans for football development of individual Member Associations and into project proposals and accountability mechanisms for the FIFA Forward 2.0 program.	02 – implementation ongoing
Third report May 2019	78	In considering whether FIFA's Ethics Code and Disciplinary Code remain fit for purpose, FIFA should specifically review the human rights implications of the current versions of both codes, and the operation of the grievance mechanisms established under them. Increasingly, cases brought to these mechanisms will involve human rights issues, so FIFA should ensure that the mechanisms are prepared to deal appropriately with them, in line with the criteria for operational-level grievance mechanisms in the UN Guiding Principles.	02 – implementation ongoing

