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# FIFTH REPORT BY THE FIFA HUMAN RIGHTS ADVISORY BOARD

*INCLUDING THE BOARD'S RECOMMENDATIONS  
FROM MARCH – DECEMBER 2020*

*FEBRUARY 2021*

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# Key Messages to FIFA

The FIFA Human Rights Advisory Board was established by FIFA in early 2017 to help strengthen its efforts to ensure respect for human rights. We, its members, are eight international experts in human rights, including labor rights, child safeguarding and anti-corruption issues, from the United Nations, trade unions, academia, civil society and business. We provide advice on an independent basis and receive no financial or other compensation for our time from FIFA or from any other football entity. The Board's second two-year mandate concluded in December 2020, and this is our final report.

In 2020, we focused on a number of issues connected to respect for women's rights in football, recognising the additional risks arising from COVID-19 because of existing inequalities between the men's and women's game. These issues included the cases of egregious sexual abuse of women in the Afghan women's national team as well as of a number of women and girls in football in Haiti, and we made recommendations on strengthening FIFA's safeguarding reporting and case management system for such cases. We also made recommendations on ensuring respect for women's rights at all levels by more closely linking FIFA's strategy on women in the game and its human rights commitments. We advised FIFA on its continued efforts, together with its Qatari partners, to improve respect for workers' rights in connection with the FIFA World Cup (FWC) 2022 and the significant opportunity that exists for a meaningful legacy in Qatar that goes beyond changes in national law – as important as those are – to truly make a difference in migrant workers' daily lives. This includes cascading the changes that have occurred on FWC sites more widely and using leverage creatively to strengthen worker voice and break down discriminatory barriers, as well as supporting truly ethical recruitment of migrant workers.

As we conclude our second and final mandate, after four years of voluntary service, we want to recognise the significant progress on human rights that FIFA has made. FIFA has taken action on a majority of our nearly 90 recommendations over that time: specifically, 60% of our recommendations have been implemented or closed out and the remaining 40% are in ongoing or advanced stages of implementation. In other words, FIFA has taken some, and often substantial, action on every single recommendation we have made. In some specific cases we wanted FIFA to go further, faster; in others, we wanted FIFA to put in place systems that would prevent such detailed recommendations being needed in future. Where FIFA did put such systems in place – for example, for liaising with its Qatari partners on urgent cases involving migrant workers – the impact is likely to be more sustainable over time.

Looking back over the last four years, we believe the organisation deserves genuine credit for the progress it has made. FIFA has led the way for other sports bodies in integrating recognition of its responsibility to respect human rights into its Statutes and into contracts with tournament hosts, and in taking substantial strides to operationalise those commitments across a wide range of issues and cases. It has also built important internal capacity with dedicated staff addressing diverse human rights issues on a daily basis.

With respect to our own role, FIFA was the first sports body to establish a model like the Human Rights Advisory Board: we have been truly independent of the organisation and have written uncensored public reports on a wide range of issues, including in situations where we disagreed with how FIFA handled a major decision or a specific situation. In such cases, we had robust exchanges with FIFA leadership about our areas of disagreement – which we consider a normal part of making progress on what can often be challenging topics. We have also engaged regularly

with human rights stakeholders throughout our mandate to ensure our recommendations were informed by their insights; this did not replace but rather complemented FIFA's own, direct engagement with those stakeholders. At the same time, there were limits to what we were able to do within the structure as it was designed, particularly with respect to establishing a regular cadence of public reporting by the Board with timely responses by FIFA, as envisaged in our ToRs.

We believe that continued progress on human rights may, however, become more rather than less challenging for FIFA in the future, with increased stakeholder pressure on fundamental human rights issues ranging from combatting structural racism, to protecting children, to equity for women at all levels of the game, and to the risks of large-scale tournaments exacerbating existing inequalities in over-stretched cities already struggling with COVID-19. To manage these challenges, FIFA will need a comprehensive human rights strategy and a body that can speak honestly to it about its performance – as we have done – with the statutory power to ensure the organisation listens to independent views on key strategic decisions.

We believe that we have reached the natural limits of our mandate under the Board's ToRs. Already in February 2020, we recommended that FIFA move to embed human rights oversight within its internal governance structures, and specifically that it "[e]stablish a functioning accountability mechanism with the mandate, expertise, capacity and incentives to ensure the integration of human rights into decision-making by relevant FIFA bodies (including the FIFA Council, the Standing Committees and the Independent Committees)". In particular, we believe there is an urgent need for a body to provide ongoing and independent evaluation of FIFA's human rights efforts through the entire life cycle of the FWC 2022 – this was the genesis of the Human Rights Advisory Board with the President's announcement in 2016 that he would create such a body to review progress on human rights in Qatar. While much has been done in Qatar, the potential for severe impacts remains, whether on migrant workers' rights in the construction sector and in other key sectors connected to the tournament such as hospitality, as we set out in this report, or in relation to other significant human rights risks during the hosting of the tournament, including for LGBTQ+ people.

We believe that FIFA's leadership needs to properly address this governance challenge by ensuring that a new structure meets three essential and mutually reinforcing criteria, namely that it: include independent human rights expertise; ensure that FIFA leadership and Council are accountable for how they integrate human rights into their decisions; and ensure transparency about progress and set-backs in FIFA's human rights work. Meeting these criteria will be essential if a new body, or reform of an existing one, is to gain the trust of stakeholders – as the Advisory Board has done – and to have even greater impact on FIFA's decision-making in the years ahead.

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# Introduction

The FIFA Human Rights Advisory Board was established by FIFA in early 2017 to help strengthen its efforts to ensure respect for human rights. Our initial two year mandate was renewed at the start of 2019 for another two year term. The Board is an independent body composed of eight international experts in human rights, including labor rights, child safeguarding and anti-corruption issues, from the United Nations, trade unions, academia, civil society and business. The Board provides FIFA with advice and recommendations on all issues that it considers relevant to the implementation of FIFA's human rights responsibilities under Article 3 of the FIFA Statutes, as elaborated in FIFA's Human Rights Policy. The Board's TORs are publicly available on FIFA's website.<sup>1</sup>

The eight members of the Board provide advice on an independent basis and receive no financial or other compensation for their time from FIFA or from any other football entity. This is the Advisory Board's fifth and final report, following the conclusion of our second term. Full information about Board members can be found on our dedicated page.<sup>2</sup>

## Our Work in General

The Board has met twice virtually since our last public report – over a series of calls in April and again in October-November 2020 – due to travel restrictions resulting from COVID-19. The meetings were hosted by Joyce Cook, FIFA's Chief Social Responsibility and Education Officer. In April, we were joined by FIFA's Deputy Secretary General Alistair Bell for a discussion about governance, and by FIFA's Chief Women's Football Officer Sarai Bareman, FIFPro's General Secretary Jonas Hoffman and Chief Women's Football Officer Amanda Vandervort for a discussion of FIFA's strategy on women in the game. We were also joined by FIFA's Director of Medical Andrew Massey for a discussion about the importance of the inclusion of transgender women and women with sex variations in the game, and the need to update FIFA's outdated 'Gender Verification Guidelines' to align with its human rights responsibilities.

More generally, we have continued to:

- Engage regularly with FIFA, primarily through the secretariat and specifically FIFA's Head of Human Rights and Anti-Discrimination.<sup>3</sup>
- Meet via Board-only conference calls on a monthly basis, including welcoming input from stakeholders with direct insight into human rights issues connected to FIFA. In urgent cases, we have increased the frequency of our internal discussions and our interactions with FIFA, as well as with other concerned stakeholders, including through the convening role played by the Centre for Sport and Human Rights.
- Engage with the Governance Committee – its powers and responsibilities under the FIFA Statutes and Governance Regulations include advising and assisting the FIFA Council on any governance topic, specifically including human rights – via the members of its human rights working group, Ian Binnie and Rainer Koch (who joined us for our April meeting).

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<sup>1</sup> See <https://resources.fifa.com/image/upload/human-rights-advisory-board-terms-of-reference.pdf?cloudid=uvmsynwru9dpmu5rgmi%20>.

<sup>2</sup> See the page kindly hosted by the Business and Human Rights Resource Centre: <https://www.business-humanrights.org/en/big-issues/major-sporting-events/fifa-human-rights-advisory-board/>.

<sup>3</sup> In this report, the "secretariat" refers to the members of FIFA's Division on Social Responsibility and Education that act as the secretariat to the Advisory Board under the Board's TOR.

## Our Fifth Report

This report is divided into three parts:

1. **Priority cases:** Cases where the Advisory Board considered that urgent action was needed from FIFA, given the imminent risk of severe harm to a specific individual or individuals' rights;
2. **Tournaments:** Ongoing management of human rights risks in connection with major FIFA tournaments, with a current focus on the FIFA World Cup (FWC) 2022 in Qatar;
3. **Thematic issues:** Broader topics that we have devoted attention to, namely strengthening FIFA's safeguarding approach (including the special safeguarding of children) particularly with regard to its reporting and case management system, ensuring respect for women's rights at all levels of the game and FIFA's internal governance of human rights.

The Board developed a number of recommendations for FIFA over the course of 2020. The recommendations on safeguarding and the women's game were made between May-June and on Qatar in July. Our reflections on FIFA's response to our recommendation on governance from our last report are also included here.

# 1. Priority cases

## Case Involving Members of the Afghan Women's Football Team

Since our last report, we have continued to follow the case involving members of the Afghan women's football team who have brought claims of severe harm, including sexual assault, against various individuals within the Afghan Football Federation (AFF). In June 2019, the Adjudicatory Chamber of the independent FIFA Ethics Committee sanctioned the former President of the AFF, Mr Keramuudin Karim, for abusing his position and sexually assaulting at least five female players, imposing a lifetime ban on all football-related activities at national and international level and a substantial fine. Mr Karim appealed to the Court of Arbitration for Sport (CAS), and his appeal was dismissed in July 2020. The Ethics Committee has also sanctioned other individuals involved in the abuses.

In June 2020, FIFA published its minimum Package of Care in cases of harassment and abuse.<sup>4</sup> Applying to victims and survivors of sexual exploitation and abuse whose cases come under the scope of FIFA's Code of Ethics, it sets out FIFA's commitments to provide appropriate and timely assistance and support through service contracts with local experts. It reflects a survivor-centred approach and was informed by input from expert stakeholders. We commend FIFA for this important policy commitment and the practical support that survivors are now receiving in connection with these kinds of cases.

In dismissing Mr Karim's appeal, the CAS panel stated:<sup>5</sup>

"In the Panel's view, [the] offenses of bribery, corruption and match-fixing, while very serious in their own right, are far less severe than the vile and horrendous offenses committed by [Mr Karim]... Indeed, unlike bribery and match-fixing which damages the integrity of the sport, the offense committed by [Mr Karim] violated basic human rights and damaged the mental and physical dignity and integrity of young female

<sup>4</sup> See <https://img.fifa.com/image/upload/jwsfapagn0bf1r4vgffn.pdf>.

<sup>5</sup> CAS 2019/A/6388 Karim Keramuudin v. FIFA, para 231, available at <https://resources.fifa.com/image/upload/cas-2019-a-6388-karim-keramuudin-v-fifa.pdf?cloudid=p7rhrk6ij9qxllhyriw>.

players. With his appalling acts, [he] has destroyed not only their careers, but severely or irreparably damaged their lives.”

The panel confirmed that Mr Karim should receive the most severe sanction possible available under the FIFA Code of Ethics - a lifetime ban and a fine of CHF 1 million. FIFA had requested that CAS adopt specific procedural steps to help protect the anonymity and well-being of witnesses, recognising the trauma involved. This highlights the scope for much greater attention to be paid to the needs of survivors in abuse and harassment cases within football remedy mechanisms – including by CAS.

From the perspective of FIFA’s human rights responsibilities, it is essential that FIFA continue its essential efforts to provide practical support to, and seek to ensure the personal safety of, the women involved and their families, and to carefully consider their interests and needs. We recognise that FIFA has continued to work closely with relevant parties in support of these objectives to date, and is committed to continuing to do so. We also recognise the critical role that the Centre for Sport and Human Rights has played in convening supportive governments, given the enormous challenges facing any organisation trying to ensure protection of Afghan survivors of sexual abuse.

We have limited our discussion of the case here, respecting the fact that essential efforts are continuing which could be undermined by any further public discussion of actions being taken by FIFA.

## Case Involving Women and Girls in Football in Haiti

In April 2020, multiple allegations emerged against the President of the Haitian Football Federation, Yves Jean-Bart, regarding repeated and severe sexual and other abuses of young female players at Haiti’s Centre Technique National. In May, FIFA suspended Mr Jean-Bart and extended this suspension in August. Between August-October, FIFA also suspended three other Federation staff for allegedly participating in the abuse. In November, following extensive on the ground investigation in Haiti by a team appointed by FIFA (and consisting of local human rights experts and psychologists with experience investigating cases of harassment and abuse), FIFA’s Ethics Committee found that Mr Jean-Bart had “abused his position and sexually harassed and abused various female players, including minors”, and imposed a lifetime ban on all football-related activities at national and international level and a substantial fine on him.<sup>6</sup> The Ethics Committee noted in its statement on the sanctions against Mr Jean-Bart that proceedings are still pending with respect to other officials.

Also in November 2020, Human Rights Watch reported evidence of systematic abuses in Haitian football, including “federation leaders confiscating players’ passports, labor rights abuses, grooming child athletes for sexual exploitation and threats to kill witnesses and survivors”.<sup>7</sup> Human Rights Watch also stated that it had “worked with FIFA’s human rights team to ensure that trauma therapy is provided to survivors and that witnesses could be protected, and has provided evidence of specific abuses to FIFA, while protecting survivors’ identities”. On 11 December 2020, FIFA for the first time appointed a normalisation committee specifically because of reported interference with witnesses, ongoing efforts to exert influence over the FA’s operations by Mr Jean-Bart, despite his ban, and the clear evidence of “severe

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<sup>6</sup> See <https://www.fifa.com/who-we-are/news/adjudicatory-chamber-of-the-independent-ethics-committee-sanctions-yves-jean-bar>.

<sup>7</sup> See <https://www.hrw.org/news/2020/11/18/haiti-end-sexual-abuse-football>.

and deeply rooted” failures in governance structures that enabled the abuse.<sup>8</sup> This will be an important tool for FIFA to consider in future cases.

Both the Afghan and Haiti cases informed the Board’s focus between May-June on how FIFA could best strengthen its overall safeguarding and reporting case management system to handle future cases of alleged sexual abuse and assault. We set out our recommendations in this area in Section 3 below. Both cases also highlight the limits of what an international sports federation like FIFA can currently do to enable appropriate remedy for survivors where national criminal justice and child protection systems fail to function effectively. Addressing such situations will require new modes of cooperation with local and international partners – a broader challenge facing global sport.

## 2. Tournaments

### FIFA World Cup 2022 in Qatar

#### **Addressing Risks to Workers From COVID-19**

In 2020, the Board continued our focus on preparations for the FWC 2022 in relation to respect for the rights of workers connected to the tournament. As the pandemic took hold globally early in the year, we, like other stakeholders grew increasingly concerned about the actual rates of illness among the migrant worker population in Qatar, and how the virus might be exacerbating existing vulnerabilities, including for those connected to the World Cup.<sup>9</sup>

While we were aware that FIFA was in regular contact with the Supreme Committee for Delivery and Legacy (SC) on the number of COVID-19 infections, the Qatari Government had imposed wider restrictions on the public disclosure of case numbers. We encouraged FIFA and the SC in a call that two Board members had with both organisations in May 2020 to engage with the Government to urgently seek the lifting of these restrictions – at a minimum, in relation to the workforce connected to the FWC 2022 – because of the severity of the risks and stakeholders’ concerns about how they were being managed. The SC shared the low number of stadia workers infected in exchanges with critical stakeholders in April-May and committed to continue such disclosure going forward. This was a positive development that complemented the detailed qualitative information being disclosed by the SC about the proactive steps it took to protect the health of workers, on and offsite, in accordance with the guidance given by the public health authorities. We also encouraged the SC to pay particular attention to the mental health of workers in the accommodation sites and to try to avoid stigma for those who fell sick with the virus, as well as providing extra support to workers to communicate with their families in their home countries.

We recognise the significant work that the SC undertook to mitigate the heightened risks to FWC workers arising from COVID-19, and the positive results of these efforts for workers. During the most critical months in Q2 and Q3 of 2020, FIFA was in daily contact with the SC about updates on numbers and preventive measures, and also engaged with stakeholders to understand their perspectives on the steps being taken. FIFA also raised key areas of concern about the wider situation in the country with the Qatari government via the SC leadership, including on efforts to keep workers in employment, and the FIFA President has repeatedly discussed workers’ welfare reforms in meetings with the Emir and members of his government.

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<sup>8</sup> See <https://www.fifa.com/who-we-are/news/normalisation-committee-appointed-for-haitian-football-association>.

<sup>9</sup> See, for example, [https://media.business-humanrights.org/media/documents/files/documents/Joint\\_Letter\\_March\\_31\\_2020.pdf](https://media.business-humanrights.org/media/documents/files/documents/Joint_Letter_March_31_2020.pdf).

## Ensuring Timely Remedy for Workers

Following our April Board meeting, the Board raised concerns with FIFA about instances of substantial delays between the identification of impacts suffered by migrant workers (particularly late or non-payments of salaries, non-reimbursement of recruitment fees and early termination of contracts), and the actual remediation of those impacts. These issues are widespread in Qatar. While the SC has systems in place to address them on FWC 2022 sites, nonetheless there have been some instances connected to the FWC, indicating that this is an area for greater attention by FIFA as current systems are expanded to other sectors involved in the tournament, beyond construction.<sup>10</sup>

The goal of remedy from a human rights perspective is to put the affected individuals back in the position they would have been in had the harm not occurred – or as close to that position as possible. Prevention of future harm can be one component of this, for example, through the SC's practice of blacklisting sub-contractors that have violated workers' rights and failed to provide them with a remedy. However, in situations of non-payment of wages owed or charging of recruitment fees, it means that the workers need to be paid (or reimbursed based on an agreed computation) in a timely manner to the full value of what they have lost (or had to pay out). Early intervention and, with the support of FIFA, the timely resolution of cases is therefore essential to avoid further compounding the harm.

Moreover, repayment is only one component of wider remedy for situations that could amount to forced labor. Until it was finally abolished in August 2020, the system of employer approval to leave a job (known as 'No Objection Certificates' or 'NOCs') meant that workers who were charged recruitment fees and/or had not been paid their full salaries and therefore wished to find new employment could be prevented from doing so, heightening the risks of a situation of bonded labor. The abolition of the NOC system was a significant step;<sup>11</sup> however, as with other aspects of the evolving labor law system in Qatar, the key issue remains effective implementation.

In specific instances, where workers are facing a precarious employment situation, a loss of employment, job reassignment or repatriation, the Board has heard directly from migrant workers and their advocates how repayment delays can add to the harm that the workers have suffered. Delays may arise, for example, because of the need to pursue formal legal proceedings against a non-compliant company; however, in such cases, the SC and FIFA should work to ensure that the provision of financial and other remedy to workers is not also held up. Accordingly, we made a preliminary recommendation to FIFA in July 2020 on this topic.

Our expanded recommendation to FIFA is that:

80. FIFA should use its on-the-ground presence in Qatar, in close collaboration with its partner the SC, to seek to enable timely remedy for workers, particularly where the harms are related to issues involving the payment of missing wages or reimbursement of recruitment fees, including by:

- a) Continuing to ensure it is proactively informed by the SC about identified cases, and engaging with the SC with a focus on achieving the right outcome for the affected workers;

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<sup>10</sup> See, for example, in relation to the FWC 2020, <https://www.amnesty.org/en/latest/news/2020/06/qatar-migrant-workers-unpaid-for-months-fifa-world-cup-stadium/>. More generally on the situation in the country, see <https://www.hrw.org/report/2020/08/24/how-can-we-work-without-wages/salary-abuses-facing-migrant-workers-ahead-qatars>.

<sup>11</sup> See [https://www.ilo.org/beirut/projects/qatar-office/WCMS\\_754391/lang-en/index.htm](https://www.ilo.org/beirut/projects/qatar-office/WCMS_754391/lang-en/index.htm).

- b) Formulating operational recommendations for its partner that support this strategic priority, including clarifying when the SC should step in to provide interim remedy under the existing provisions of the Worker Welfare Standards where the responsible parties fail to do so;
- c) Incorporate a focus on timely remedy into FIFA's due diligence with respect to event-related procurement and hotel accommodation, including the conditions of migrant workers in FWC-accredited hotels and also in the wider hospitality sector that will support FWC-related tourism;
- d) Using its leverage to seek improvements in the timeliness and appropriateness of remedy delivered through relevant state mechanisms, including the compensation fund managed by the Ministry of Administrative Development, Labor and Social Affairs (MADLSA);
- e) Increasing engagement with local migrant workers' representatives and community groups to inform its approach.

FIFA has already taken steps to act on this recommendation. We now also recommend that:

81. FIFA should learn from its experiences in Qatar and prior tournaments and explore the approaches adopted in major construction projects in countries such as Canada and Sweden to require the main contractor to set aside a proportion of the total contract amount to protect against future claims of unpaid wages, accidents or other harms at the sub-contractor level. FIFA should determine an appropriate model that future FWC hosts should be required to integrate into their construction contracts to ensure they are prepared to address such situations if they arise.

At our October meeting, FIFA confirmed that it would increase the regularity of exchanges with the SC on issues arising from the SC's labor rights monitoring, and that it had asked the SC to look at how speedier access for workers to the compensation fund could be ensured. One way of doing this would be for the system to take account of evidence found during the SC's monitoring visits. The Board observed that the construction phase is ending in 2021, and heightened risks to workers often come towards the end of construction due to the pressure to meet approaching deadlines; this will require enhanced vigilance from both the SC and FIFA, including through an intensification of the joint inspection approach with Building and Woodworkers International (BWI). There is also a need for FIFA and the SC to have a phase-out plan in place in the event that impacts are identified once the stadia are completed and ready for use in the tournament. FIFA should ensure it avoids the kind of situation seen in other major event contexts where unpaid construction workers are still seeking remedy even after competition has started.

The scale of the challenge confronting efforts to ensure respect for migrant workers' rights in Qatar was highlighted in the April 2020 report of the UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance, in which she described a "de facto caste system based on national origin, which results in structural discrimination against non-citizens, including as the result of immense power imbalances between employers and migrant workers rooted in the *kafala* (sponsorship) system that historically structured labour relations in Qatar".<sup>12</sup> Given this broader context, the progress that has been made on FWC stadia sites in the last four years is dramatic; this progress has been underpinned by the MoU between the SC and BWI and the constructive relationship between the two organisations, based on a shared vision of improved outcomes for workers.

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<sup>12</sup> Available at <https://undocs.org/A/HRC/44/57/Add.1>

While the key elements of the kafala system have been formally dismantled, the continuing effects of the broader structural discrimination against the predominantly migrant workforce in Qatar, including the ongoing challenge in ensuring local demand for ethical recruitment, mean that transferring the practical knowledge and legacy from FWC sites into connected sectors such as hospitality and logistics will require significant effort from both the SC and FIFA. The establishment of the system of Worker Welfare Forums and BWI's work to strengthen them so that they are truly vehicles for enabling worker voice and remedy – as championed by BWI's former Global Campaign Director, the late Jin Sook Lee – should be at the centre of these efforts.

We therefore recommend that, as FIFA moves to establish new internal accountability structures as discussed in Section 3 below:

82. FIFA should establish an appropriate body to take over the Human Rights Advisory Board's role to provide ongoing and independent evaluation of FIFA's human rights efforts through the entire life cycle of the FWC 2022, including both recognition of work done and progress achieved as well as risks still remaining to be addressed.

There is huge potential for FIFA and the SC to leave a legacy on workers' rights in Qatar that goes beyond changes in the law and is evidenced by the positive outcomes for people that can be achieved when both parties commit to use their leverage to its full extent and as creatively as possible, including on outstanding challenges that require collective leverage such as the creation of and support for ethical recruitment models. We urge FIFA to support this vision of legacy and work with the SC and other key stakeholders like BWI to develop a plan that reflects it.

## FIFA World Cup 2026 in Canada, Mexico and the United States

Two members of the Advisory Board reviewed FIFA's approach and related documents regarding the human rights component of the city selection process for the FWC 2026 in Canada, Mexico and the US. We emphasised the need for a consistent and transparent approach in order to treat all cities equally. Additionally, we recommended that FIFA should clarify that any list of risks and stakeholders is indicative only, and that issues should be prioritised according to the severity of the risks to people in each case.

In September, FIFA sent its "Information and guidance material on human rights-related components of the FIFA World Cup 2026 host city selection process" to the candidate cities. Together with expert human and labor rights stakeholders, we welcomed FIFA's subsequent decision to extend the deadline for cities to provide a human rights report, including "a comprehensive and meaningful engagement process with city-level stakeholders", from end January to June 2021, since this is much more likely to enable a meaningful process in practice. FIFA has offered to provide feedback on a first version of those reports.

Members of the Board also discussed the "Child-focused Questions for Inclusion in the United 2026 Human Rights Scorecard Guidance Note", a detailed document developed by a working group under the auspices of the Centre for Sport and Human Rights, with FIFA.

## 3. Thematic Issues

### Strengthening FIFA's Safeguarding Reporting and Case Management System

Situations of harassment and abuse can occur where one party is dependent on another for access to resources or for opportunities.<sup>13</sup> They often occur within a broader culture of abuse of power, involving corruption, a climate of fear and a lack of transparency and accountability. Senior leaders of an organisation may be directly implicated in the alleged harms, or may have overlooked, ignored or even hushed up evidence of problems. Where the person being abused is potentially vulnerable for other reasons – such as where they are a child – the risks of harm can be even greater.

In the last year, FIFA has adopted a range of measures to advance the protection of people – particularly children and young people – from harassment and abuse. FIFA's Guardians Program and Toolkit for Member Associations (MAs), which focuses on child safeguarding, was launched in 2019 and a Safeguarding and Child Protection Department established. By end-2020, FIFA had hired, in addition to the Head of Safeguarding, a Senior Event Safeguarding Manager and a Training and Capacity Building Manager for the Guardians Program, dedicated to advancing the implementation of these tools and developing new ones (such as guidance on bidding requirements related to safeguarding measures at FIFA competitions). FIFA's operational efforts in this area have been supported by a child safeguarding working group with members with relevant expertise.

FIFA will launch the FIFA Guardian Safeguarding in Sport Diploma in early 2021 and has asked all 211 MAs to mandate a person responsible for safeguarding to take the course. The course focuses on children, although the core principles and practises are also relevant to adult safeguarding. It seeks to professionalise the safeguarding officer role in sport and build safeguarding capacity among MAs. The aim is that all MAs should have effective systems to appropriately respond to cases of harassment and abuse that link to national mechanisms to address such harms, including the police, child protection agencies and the courts. FIFA will make the course freely available to individuals in responsible positions in other sports to support wider progress on these issues.

With respect to the role of football agents, FIFA is implementing a new framework that will require football agents to undergo specific training (including continuing education) if they wish to represent minors and will make information available in an online directory about whether certain agents are allowed to represent minors. FIFA also collaborated with the World Health Organisation and the European Commission on the #SafeHome online digital campaign against domestic violence during COVID-19.

However, beyond these important efforts to prevent harm, as FIFA itself recognises, receiving and dealing with reports of harassment and abuse from around the world and in multiple languages poses significant challenges for the organisation. FIFA acknowledges that appropriate, good quality care and support services should be available to individuals who have been victims of sexual harassment and abuse, including in engaging with complainants appropriately to avoid further trauma. Even with an awareness of these sensitivities, the mere fact of handling such complaints internally can give rise to an actual, or perceived, conflict of interest; it can be hard to encourage people to trust a purely internal system, particularly where prominent individuals within football are accused directly of harms or of enabling an abusive culture to flourish. This was the situation in both the Afghan and Haiti cases where it would have

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<sup>13</sup> For clarity, we understand harassment and abuse to include sexual, physical and emotional harassment and abuse, neglect and bullying.

been totally unrealistic to expect those harmed to have used complaints channels at the MA levels. A similar situation could occur at the FIFA level, for example if a Council member was allegedly involved in severe harms. For cases involving children or young people, encouraging reporting becomes an even more complex and challenging issue.

Experience in other sectors as well as in sport shows that an independent reporting system can help ensure the prioritization of the interests and needs of victims (and other persons reporting harm) in how such allegations are handled – rather than those of the organisation. At the same time, sports bodies should not expect complainants to fit within existing systems that were primarily designed to address other integrity issues within the sport where the focus of those systems is on protecting the sport, rather than protecting the people in it. It was clear that FIFA needed to build on the steps it had already taken to adopt a survivor-centred approach by designing a reporting and case management system that was more responsive to the severity of these harms and the challenges of handling abuse and harassment cases appropriately.

Over several months in mid-2020, FIFA sought the views of individuals with experience advising and supporting complainants and survivors of sexual abuse and harassment, as well as other experts, on how best to move forwards. As part of this process, FIFA consulted with the Advisory Board. Without wanting to pre-empt the final approach that would emerge from these consultations, we expressed our view that a fully independent Ombudsperson system should form a critical component of a new, professional infrastructure for preventing and addressing abuse and harassment in football. This should be in addition to other accessible channels at the club or local level (which may be more appropriately tailored to the needs and positions of children and players) as well as the ability to access grievance mechanisms on the spot for individuals competing in FIFA tournaments.

We made the following recommendation to FIFA in June 2020 recognizing that while the precise structure of a new system might end up looking different, the core principles we articulate below should guide FIFA's future efforts in this area.

83. FIFA should establish a fully independent and appropriately resourced network of regional expert Ombudspersons to receive and assess confidential reports of harassment or abuse by anyone linked to FIFA. The Ombudspersons should be empowered to make an independent initial assessment of the case and determine the appropriate path forward – with the consent of the victim and/or person reporting the harm, where this involves a complaint to the relevant national authorities, a complaint to the FIFA Ethics Committee, mediation or other course of action.

The system should:

- a) Be safe and accessible for victims, and also for those reporting harms or supporting victims, including by protecting against the risk of reprisals and by being able to respond promptly to reports and ensure timely follow up;
- b) Give individuals that are alleged to have engaged in such harms confidence that the system will operate fairly and on the basis of confidentiality and professionalism;
- c) Adopt a survivor-centred approach to gathering information and making decisions at different steps in the process;

- d) Recognise that different channels, approaches and partnerships with local organisations will be needed for individuals who may be particularly vulnerable and unlikely to access the system directly, especially children;
- e) Reinforce, and not undermine, effective national-level mechanisms to address such harms, including child protection agencies and courts;
- f) Be appropriately adapted to operate during FIFA-owned or branded tournaments, including youth championships;
- g) Sit within a strengthened approach to prevention of harassment and abuse that builds on the FIFA Guardians Program and uses all the leverage at FIFA's disposal to change behaviour and incentives at the Member Association level, including by placing conditions on the disbursement of funding under the FIFA Forward Program;
- h) Be designed in collaboration with input from the expert Ombudspersons, and with input from potential users of the system, who can advise on what would help instil trust especially in country contexts lacking basic rule of law and other protections for victims and reporting persons.

In September, FIFA announced that it would launch a consultation process that “includes sports organisations, intergovernmental authorities, governments and specialist agencies with the objective of establishing an independent, multi-sports, multi-agency international entity to investigate abuse cases in sports.”<sup>14</sup> Such a new entity could “provide trusted reporting lines, a global pool of experts that can be promptly mobilised to provide local specialist case management and care support to victims, witnesses and whistleblowers, as well as establishing standardised sanctions and disciplinary measures and screening processes to ensure that perpetrators cannot move from one region to another, between different sports, nor escape justice.” We welcome this consultation. We expect that the process will follow internationally accepted stakeholder consultation standards and that the result will fully integrate the principles included in our recommendation above, which FIFA has committed to work to ensure. The Board was briefed by the consultant appointed by FIFA in late 2020, and a number of members are participating in it as expert stakeholders now that our Board mandate has concluded.

In June 2020 we also made the following, related recommendations to FIFA on strengthening its internal architecture around handling complaints:

- 84. To oversee complaints of harassment and abuse that proceed under the FIFA Code of Ethics, FIFA should appoint an individual with significant experience investigating and handling such cases as a member of the independent Ethics Committee Investigatory Chamber. If a complaint to the Ethics Committee is initiated, or an allegation is otherwise brought to FIFA's attention outside of a new independent reporting system, there must be a clear internal policy on how staff should handle that information in order to protect the rights of victims, reporting persons and alleged perpetrators, with appropriate penalties for any breach.
- 85. FIFA should appoint an experienced safeguarding case manager to coordinate support for complainants in proceedings before the Ethics Committee, and to liaise on follow up support and referrals for survivors of abuse. This function would most appropriately sit within the current Safeguarding Department. It should focus

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<sup>14</sup> See <https://www.fifa.com/who-we-are/news/fifa-and-unodc-stress-importance-of-cooperation-in-tackling-crime-threat>.

on victim well-being and should have an adequate budget to secure appropriate services for victim care and protection.

86. FIFA's Audit and Compliance Committee or other appropriate body should be responsible for reviewing the general operation of FIFA's reporting systems (both a new independent system as well as the functioning of the Ethics Committee) and whether the rights of victims, reporting persons and alleged perpetrators are being appropriately protected.

Since June, FIFA has implemented an internal policy on how to report cases of abuse outside of formal reporting channels, and the new hires in the Safeguarding Department are working closely with the Ethics Department on abuse cases to help protect victims in line with the minimum Package of Care.

Recognising that reporting is only one aspect of a comprehensive approach to prevent and address such harm, the Board stresses the importance of FIFA continuing to explore additional issues in consultation with experts and affected stakeholders, including: raising awareness of reporting systems and encouraging greater trust in them by transparently sharing their outcomes and reviewing their functioning together with the users of those systems; the provision of funding for independent legal advice and other support to complainants; ongoing survivor care during and following any proceedings; and the particular needs and rights of children in such complaints or proceedings, and the responsibilities of those with a legal duty of care for them.

## Respecting Women's Rights in Football<sup>15</sup>

### Responding to COVID-19 and building back better

The Board had committed to focus on players' rights as part of our work in 2020. With the onset of COVID-19, we decided to dedicate attention to the question of how the pandemic was impacting players with a focus on the experiences of women players who we anticipated were more likely to be negatively affected by it given existing inequalities. We explored this question as part of our April Board meeting.

As FIFPro's survey of women players in April showed, many faced immediate hardships connected to the COVID-19 crisis that amounted to human rights impacts – on their livelihoods, mental and physical health and labor rights.<sup>16</sup> The existing inequalities in the men's and women's game meant that these hardships had the potential to be more severe than the (also serious) risks confronting many male players. FIFPro's follow up surveys in July-October confirmed that women players had indeed been significantly impacted, including in their access to mental and physical health services and in their job security.<sup>17</sup>

There is an understandable fear among women in the game, and those who support them, that as football seeks to build back from the crisis, purely commercial rationales will dominate, leading to greater support for and attention to the men's game. Yet it is precisely because women are likely to be more severely impacted by the effects of the

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<sup>15</sup> The Board uses the term 'women' in line with international human rights standards to include cisgender and transgender women, and women with variations in their sex characteristics.

<sup>16</sup> See FIFPro, "COVID-19: Implications for Professional Women's Football", April 2020, available at <https://www.fifpro.org/en/health/coronavirus-covid-19-page/covid-19-implications-for-women-s-football>.

<sup>17</sup> See FIFPro, "FIFPro Player Unions Reveal Ongoing Impacts of COVID-19 on Women's Football", November 2020, available at <https://www.fifpro.org/media/2fch1p1/fifpro-player-unions-reveal-ongoing-impacts-of-covid19-on-women-s-football.pdf>.

pandemic and its impact on sport that rebuilding efforts need to put their rights at the centre. We therefore made the following recommendation to FIFA in June 2020:

87. FIFA should commit to ensuring that the inequalities currently faced by women in the game are mitigated in FIFA's decision-making in response to COVID-19 and in building back better. This should include:
- a) Ensuring that the views, input and feedback of women players are factored into decisions likely to affect them, including through the involvement of trade unions where players are represented;
  - b) Ensuring that the special financial support by FIFA to Member Associations (MAs) as part of the COVID-19 relief plan that is ring-fenced for investment in women's football (including any reallocation of FIFA Forward project funds) is spent accordingly and that MAs are held accountable for how it is spent;
  - c) Addressing the inequalities in working conditions for elite women players, including risks to player health and safety arising from international and domestic match calendars and the need for innovative compensation structures that can enable women to be full-time professional players with access to the same protections as male full-time players;
  - d) Addressing specific inequalities in current standards for men's and women's tournaments, including in relation to facilities and equipment, preparation, travel and accommodation at the FIFA Women's World Cup as well as other future FIFA-branded women's tournaments;
  - e) Putting women's rights at the centre of ongoing work to implement FIFA's Women's Football Strategy at all levels of the game in order to prioritize action and resources to support those who may be most vulnerable to negative impacts, in line with FIFA's existing human rights commitments.

Since then, a number of developments have occurred. FIFA worked with FIFPro and other stakeholders to develop the COVID-19 relief plan, including aspects related to the women's game. In late July 2020 FIFA approved the regulations for the third phase of the FIFA COVID-19 relief plan, which included grants of up to \$500,000 for MAs specifically to support the women's game with reporting requirements. In September, FIFA launched the FIFA Women's Development Programme to further develop women's football through additional resources and expertise for MAs over the 2020-23 period. In December, the FIFA Council approved new minimum labour conditions for women's football which cover female professional football players who want to have children during their playing career. They provide for maternity leave and provision of physical and medical support when returning to work and had been advocated for by women players and by FIFPro.

Looking ahead, FIFA has a significant opportunity with the FIFA Women's World Cup 2023 in Australia and New Zealand to work closely with stakeholders in both countries on robust human rights action plans with a focus on women's rights, building on the positive momentum of Women's World Cup 2019 in France. In addition, FIFA's decision to review its outdated 'Gender Verification Guidelines' in light of its human rights commitments is a welcome step that should allow for a more respectful and informed discussion about the inclusion of transgender women and women with sex variations in football than has been the case in other sports. Finally, FIFA's continued work on safeguarding, particularly its commitment to strengthen its reporting and case management structures, has the potential to enable greater respect for women's rights at all levels of the game.

### **Holding the Football Ecosystem Accountable for Progress on the Women's Game**

In its FIFA 2.0 strategy, FIFA committed to heighten its oversight of MAs and ensure that all stakeholders in the football ecosystem are held to appropriate standards of governance. FIFA provides funds to MAs on a yearly basis and for special projects under the FIFA Forward Program. These funds are typically subject to conditions that at least part of the funding will be used to support the women's game (i.e. to support girls and women in football). MAs are required to publish their annual audited accounts and FIFA has established an internal audit regime, supported by an annual audit of MAs receiving Forward funds carried out by external auditors. The Audit and Compliance Committee reviews the auditors' findings and can require MAs to be placed under restricted or suspended funding; however, there is no requirement that the results of these audits be made public.

FIFA released all operational funding due to MAs for 2019 and 2020 in April 2020, making clear that the purpose was to meet immediate needs and obligations arising from the financial impact of COVID-19. FIFA stressed that: "The standard obligations and responsibilities in relation to the use of these funds as outlined in the Forward 2.0 Regulations remain fully applicable and will be subject to the standard audit and reporting process."<sup>18</sup> The additional, special COVID-19 relief funding for MAs is also subject to the conditions in the Forward 2.0 Regulations. It will be vital to ensure that funds are spent on addressing the needs of those who are demonstrably the most vulnerable to negative impacts, specifically women and children.

An "audit from below" approach can promote accountability through increased transparency by requiring MAs to disclose gender disaggregated data on how funding has been spent, thereby enabling those who are intended to benefit from such funds (women players, coaches and officials) to check whether what is being disclosed aligns with how they are being spent in practice, with potential support from NGOs, trade unions or journalists. The FIFA Forward Impact Map could be one tool in this regard.<sup>19</sup> FIFA should actively promote such an approach and the use of a confidential reporting channel to alert FIFA to any discrepancies. Given the perceived risk that COVID-19 will lead to the downgrading of women's needs and rights across football, this is one way in which FIFA can generate greater trust in how funds are being spent by MAs, both in the current circumstances and into the future.

88. FIFA should disclose the annual amount given to each MA (from regular as well as any special or emergency funds) that is dedicated to women and girls in football, and require each MA to disclose what has been spent, how and when. This should help to enable an "audit from below" approach through which female players, coaches of women's teams, officials and others can follow up on the use of FIFA funds dedicated to the women's game and confidentially alert FIFA when they believe that the purpose of the funding has not been met.

FIFA has set targets for the involvement of women in football governance both within FIFA and MAs and is looking at how to build out its support to MAs in this area. Regular updates are key to determine whether progress towards these targets is adequate, and to develop appropriate responses if it is not. One important tool could be an annual global report on progress, which could help raise awareness, enable public scrutiny and generate peer competition among football leaders.

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<sup>18</sup> FIFA Press Release, available at <https://www.fifa.com/who-we-are/news/fifa-starts-immediate-financial-support-to-member-associations-in-response-to-co>.

<sup>19</sup> See <https://www.fifa.com/what-we-do/fifa-forward/impact-map>.

89. To help hold all members of the football ecosystem, men and women alike, responsible for improving the situation of women in football, FIFA should publish an annual update on women's participation in football. At a minimum, this should include information on: the numbers of female leagues/teams, players, referees and coaches in each MA; the numbers of women on the oversight body (council or board) and at management level in FIFA, Confederations and MAs; as well as the budget dedicated to girls and women in football by each organisation.

Over time, FIFA should be reporting not only on the presence of women at different levels of the game but on their sense of well-being and the extent to which they feel respected, safe and valued; without such qualitative information, purely quantitative metrics may give the impression of progress without this aligning with women's experiences in practice. This would be an important indicator that the organisation understands what is needed to truly improve and sustain women's representation, including at senior levels, in line with broader diversity and inclusion expectations. FIFPro's global surveys of women in the game are important evidence of women's current experiences in this regard.

## Embedding Respect for Human Rights in Football Governance

### **Increasing Capacity on Human Rights**

As highlighted in our last report, in late 2019 FIFA announced significant changes in how it organizes its human rights work by creating a new Social Responsibility and Education Division. The Division now includes Departments on Human Rights and Non-Discrimination, Safeguarding and Sustainability. It is now entirely separate from the FIFA Foundation (a point of concern for us last year). The Chief Social Responsibility and Education Officer sits on FIFA's Management Board, the senior decision-making body within the FIFA Administration, with a dual reporting line to the President and to the Secretary General.

We welcome the fact that FIFA has increased the human resources dedicated to meeting FIFA's human rights responsibilities. In addition to building out the Safeguarding and Child Protection Department as noted above, FIFA will also be adding capacity to the Human Rights and Anti-Discrimination Department. This will bring FIFA's total capacity across the Division to 12 staff working exclusively on human rights and sustainability-related issues in addition to the Chief Officer.

However, FIFA has not yet set a clear roadmap for the organisation's overall work on human rights and how it intends to embed or mainstream human rights throughout the Administration. We remain concerned that the lack of such a strategic roadmap has compounded the confusing and so far inconclusive discussions on the future of governance and accountability on human rights at FIFA, which we now turn to.

### **Accountability on Human Rights at the Political and Governance Level**

We believe the Human Rights Advisory Board has played a de facto role in FIFA's governance structure as an independent, expert voice on FIFA's efforts to meet its human rights commitments; but our role has been advisory only. With the Board's second and final two-year mandate concluding at the end of 2020, FIFA needs a body with authority under the FIFA Statutes to hold the organisation accountable and to ensure the credibility of its approach moving forwards.

In February 2020, we recommended that FIFA should develop and commit to a roadmap for embedding human rights into the organisation's decision-making, with a focus on the political and governance level (recommendation R79).<sup>20</sup> Specifically, we said that the roadmap should:

[e]stablish a functioning accountability mechanism with the mandate, expertise, capacity and incentives to ensure the integration of human rights into decision-making by relevant FIFA bodies (including the FIFA Council, the Standing Committees and the Independent Committees). This should include clarifying the roles of the Governance as well as the Audit and Compliance Committee with regard to human rights, and ensuring that the Governance Committee is fully able to advise and assist the FIFA Council on any human rights matters.

Over the months following our recommendation, we have had ongoing discussions with FIFA's leadership about what this new approach could look like and how existing weaknesses in the role of the Governance Committee could be addressed. FIFA has yet to determine the final structure. For the moment therefore, we limit our comments to the three key principles that we outlined to FIFA in May 2020 as forming the essential, mutually reinforcing elements of any new approach, and which we have used to evaluate the various proposals FIFA has discussed with us since then. Any new structure should ensure: i) the involvement of **independent human rights expertise** in making recommendations and evaluating the organisation's approach; ii) that FIFA leadership and Council are **accountable** for how they integrate human rights into their decision-making; and iii) that there is appropriate **transparency** about progress and set-backs in FIFA's human rights work.

We firmly believe that accountability on human rights needs to be brought inside, into FIFA's governance; but the critical test of whatever FIFA does will be whether it results in the elevation of human rights in the organization's decision-making and strategy. FIFA cannot afford to be seen to do less than what it has done, with the Advisory Board's support and guidance, over the last four years.

## Final Reflections

As we conclude our second mandate after four years of voluntary service, we want to recognise the significant progress on human rights that FIFA has made. FIFA has taken action on a majority of our nearly 90 recommendations over that time: specifically, 60% of our recommendations have been implemented or closed out and the remaining 40% are in ongoing or advanced stages of implementation. In other words, FIFA has taken some, and often substantial, action on every single recommendation we have made. In some specific cases we wanted FIFA to go further, faster; in others, we wanted FIFA to put in place systems that would prevent such detailed recommendations being needed in future. Where FIFA did put such systems in place – for example, for liaising with its Qatari partners on urgent cases involving migrant workers – the impact is likely to be more sustainable over time.

FIFA has led the way for other sports bodies in integrating recognition of its responsibility to respect human rights into its Statutes and into key contracts with tournament hosts, and in taking substantial strides to operationalise those

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<sup>20</sup> There was strong stakeholder support for FIFA to pay attention to this issue: see the statement by the Sport and Rights Alliance available at <https://www.uniglobalunion.org/news/sport-rights-alliance-backs-human-rights-advisory-board-call-fifa-be-accountable-human-rights>.

commitments across a wide range of issues and cases. It has also built important internal capacity with dedicated staff addressing diverse human rights issues on a daily basis.

Looking back over the last four years, we believe the organisation deserves genuine credit for that progress under the operational leadership of individuals including the Secretary-General, Fatma Samoura, the former Head of Sustainability and Diversity (now Head of Sustainability and Environment), Federico Addiechi, and the Chief Social Responsibility and Education Officer, Joyce Cook. Such progress would not have been possible without, on the one hand, the President's decision to integrate human rights into FIFA's strategy, and on the other, the committed, daily work of a team of experts inside the house, led by the Head of Human Rights and Anti-Discrimination, Andreas Graf, and Head of Safeguarding and Child Protection, Kathryn Leslie. Other internal colleagues have also contributed to these efforts.

With respect to our own role, FIFA was the first sports body to establish a model like the Human Rights Advisory Board: we have been truly independent of the organisation and have written uncensored public reports on a wide range of issues, including in situations where we disagreed with how FIFA handled a major decision or a specific situation. In such cases, we had robust exchanges with FIFA leadership about our areas of disagreement – which we consider a normal part of making progress on what can often be challenging topics. We have also engaged regularly with human rights stakeholders throughout our mandate to ensure our recommendations were informed by their insights; this did not replace but rather complemented FIFA's own, direct engagement with those stakeholders. At the same time, there were limits to what we were able to do within the structure as it was designed, particularly with respect to establishing a regular cadence of public reporting by the Board with timely responses by FIFA, as envisaged in our ToRs. We believe that we have reached the natural limits of our mandate under the Board's ToRs.

Looking ahead, we believe that continued progress may become more rather than less challenging for FIFA in the future, with increased stakeholder pressure on fundamental human rights issues ranging from combatting structural racism, to the protection of children, to equity for women at all levels of the game, to the risks of large-scale tournaments exacerbating existing inequalities in over-stretched cities already struggling with COVID-19. To manage these challenges, FIFA will need a body that can speak honestly to it about its performance – as we have done – with the statutory power to ensure the organisation listens to independent views, including on key strategic decisions.

In particular, as FIFA moves to create new accountability structures, we believe there is an urgent need for a body to provide ongoing and independent evaluation of FIFA's human rights efforts through the entire life cycle of the FWC 2022 – this was the genesis of the Advisory Board with the President's announcement in 2016 that he would create such a body to review progress on human rights in Qatar. While much has been done in Qatar, the potential for severe impacts remains, whether on migrant workers' rights in the construction sector and in other key sectors connected to the tournament such as hospitality, as we set out above, or in relation to other significant human rights risks during the hosting of the tournament, including for LGBTQ+ people.

We believe that FIFA's leadership needs to properly address this governance challenge by ensuring that any future structure meets the three essential and mutually reinforcing criteria we set out above. Meeting these criteria will be essential if a new body, or reform of an existing one, is to gain the trust of stakeholders – as the Advisory Board has done – and to have even greater impact on FIFA's decision-making in the years ahead.

In closing, we wish to extend our sincere thanks to the many stakeholders – current and former players, leaders from human rights NGOs, trade unions, international organisations and FIFA partners, parliamentarians, expert consultants and lawyers – who have given us their time and insights and have deepened and strengthened our work as a result. Most importantly of all, and at the root of everything we and FIFA seek to do on human rights, we thank the individuals who have shared their own experiences of harm connected to the world of football and had confidence in our commitment to supporting them.