
FOURTH REPORT
BY THE FIFA
HUMAN RIGHTS
ADVISORY BOARD

*INCLUDING THE BOARD'S RECOMMENDATIONS
FROM MAY – DECEMBER 2019*

JANUARY 2020

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 and anti-corruption issues, from the United Nations, trade unions, 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.

During our three years of voluntary service, we have seen FIFA tackle a range of critical human rights issues and cases and make important progress, including in relation to sexual abuse against members of the Afghanistan women's team, improving respect for workers' rights together with its local partners for the FIFA World Cup 2022 in Qatar, non-discriminatory access by women to stadia in Iran, and guidance on safeguarding children within the world of football. Of course there is much more still to be done on these and many other issues, but FIFA has shown that it is possible for a global sporting body to make meaningful progress on meeting its human rights responsibilities.

The bulk of this good work has been carried out at the expert, operational level within the Administration. In September 2019, FIFA announced that its human rights and sustainability work would be restructured and moved into a new Division for Social Responsibility and Education, alongside the FIFA Foundation. The Board has been assured that this reflects a commitment to further step up resources, education and work on human rights. At the same time, FIFA will need to manage the risk and perception that, by locating responsibility for human rights alongside the independent Foundation which funds projects supporting positive social change through football, human rights comes to be seen as something that can be pursued discretely, rather than integrated into day-to-day decision-making across FIFA's operations. We believe that this risk can be managed, and that the new structure offers opportunities to enhance FIFA's human rights work, but a clear strategy for the work of the new Division and consistent top-level messaging about the relevance of human rights to decision-making across the organization will be essential.

At the same time, while recognizing what has been achieved operationally, confusing and sometimes contradictory signals have been sent at the political and governance levels of the organization about the importance and implications of FIFA's human rights commitments. It is our view that FIFA's human rights efforts have now come to an important cross-roads that require FIFA to deepen its efforts to embed its human rights commitments into the governance of global football or risk losing the ground that has been gained.

For example, we, along with other stakeholders, were concerned by the awarding in October 2019 of the expanded FIFA Club World Cup to China without appropriate human rights due diligence prior to the decision, or appropriate communication about how FIFA intended to manage human rights risks in connection with the tournament. Of course the purpose of FIFA's human rights commitments is not to prevent the organization from going to or engaging with specific countries, whether as hosts of its tournaments or as Member Associations. That would directly conflict with its role as the global governance body for football. Rather, the purpose is to require FIFA to engage with an understanding of the human rights risks the organization may be connected to, and a credible assessment of what FIFA can expect its partners to do about them. Where FIFA has willing partners, and is committed to using its own leverage, we have seen that substantial progress is possible. Where that is not the case, FIFA can still make the decision to engage, but should do so with eyes wide open and a realistic mitigation strategy, in the same way the organization would handle any other type of risk – be it financial, operational or reputational.

More broadly, we are concerned by the continuing lack of clarity about how accountability for human rights will be ensured with regard to political and strategic decision-making within the organization. That requires an entity at the political or governance level that has not only a clear mandate but also the expertise, capacity and incentives to routinely hold FIFA to account against its own human rights commitments in relation to critical decisions. We do not believe that there currently is such an entity. The Governance Committee has a mandate to “advise and assist” the FIFA Council on human rights, but has yet to exercise this responsibility fully, beyond providing updates. The Advisory Board is, as our title indicates, advisory only. We make our recommendations to the “general secretariat” (ie, the FIFA Administration); we took up our role on the assumption that the Governance Committee would be fulfilling its statutory mandate to the full extent of its powers. The FIFA Council is accountable to the Audit and Compliance Committee on governance matters, and the Committee has the power to raise issues of non-compliance with the Congress. But we are not aware of the Audit and Compliance Committee performing this role on human rights, or perceiving it has a mandate to do so.

We believe that how FIFA moves forward now in embedding accountability for human rights into political and strategic decision-making will determine whether its significant human rights efforts over the last few years will be reinforced and continue to serve as an example for other global sports bodies, or risk being gradually undermined through an erosion in the stakeholder trust that FIFA has worked to build. As we explain in Part 3 below, in this report we therefore make **one single recommendation to FIFA’s leadership: to develop a roadmap for further embedding FIFA’s human rights commitments into decision-making at all levels of the organization with a focus on the political and governance levels, including a mechanism to hold FIFA bodies (as defined in Art 24 of the FIFA Statutes) accountable for progress against that roadmap.** We will be monitoring FIFA’s efforts to adopt and implement such a roadmap through the first half of 2020.

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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. The Board is an independent body composed of eight international experts in human rights, including labor rights and anti-corruption issues, from the United Nations, trade unions, civil society and business. Board members are appointed for a term of two years. 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.¹

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 fourth formal report. Full information about Board members can be found on our dedicated page.²

Our Work in General

The Board has met once in person since our last public report – in October 2019, at FIFA Headquarters, for two days. We were hosted by Joyce Cook, the new General Secretary of the FIFA Foundation and Chief Social Responsibility and Education Officer, heading up a new Division that integrates the Sustainability and Diversity Department, as well as a new Safeguarding and Child Protection section. We discuss this new structure further in part 3 below. With FIFA's Secretary General taking on new and temporary responsibilities in relation to the Confederation of African Football, we also met with FIFA's Deputy Secretary General Alistair Bell who has taken over day to day responsibility for the FIFA Administration.

Our chair, Rachel Davis, and Board member Sylvia Schenk also met with the FIFA President in July to discuss a number of urgent human rights topics, including the continuing situation of discrimination against women in Iran. More generally, we have continued to:

- Engage regularly with FIFA, primarily through the secretariat and specifically FIFA's Human Rights Manager.³
- 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, such as in the lead up to the Iran-Cambodia FIFA World Cup 2022 qualifying match in Tehran (see further below), 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 (joining our Advisory Board meeting in October), and Rainer Koch (joining us for part of the meeting).

Our Fourth Report

This report is divided into three parts following the new format we established in our last report in April 2019:

¹ See <https://resources.fifa.com/image/upload/human-rights-advisory-board-terms-of-reference.pdf?cloudid=uvmsynwrn9dpmyn5rgmi>.

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

³ In this report, the “secretariat” refers to the members of FIFA's Sustainability and Diversity Department that have responsibility for human rights and act as the secretariat to the Advisory Board under the Board's TOR.

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;
3. **Thematic issues:** Broader topics that we are devoting attention to, including embedding human rights into FIFA's governance and players' rights.

However, we have deliberately chosen to make only one new recommendation to FIFA in this report, which is on the topic of embedding FIFA's responsibility to respect human rights into its governance and decision-making structures. This is because:

- (a) we have made 78 recommendations to date, many of which have been acted on or closed out but a number remain open and FIFA is still working and/or engaging with us on them,
- (b) we received a detailed update from FIFA in January about progress on our recommendations, but FIFA has not been able to provide public updates on how it is addressing our recommendations since its last update in September 2018 due to resource constraints, and
- (c) we are waiting to see the full implications of the significant changes in FIFA's organization of its human rights work that were introduced in September 2019.

Accordingly, in parts 1 and 2 we summarize our view of FIFA's progress since our last report, and in part 3 we highlight our questions and concerns about FIFA's path forward and make our sole recommendation to FIFA for this reporting period.

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, 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 has appealed to the Court of Arbitration for Sport (CAS).

In October, the Chamber sanctioned the former General Secretary of the AFF and AFC Executive Committee member, Mr Sayed Aghazada, finding that he was aware of the abuse by Mr Karim and had breached his duty to report and prevent it, imposing a five year ban and a fine. The Chamber noted that it was continuing to look into allegations against other officials in connection to the same investigation and there have been further developments in this regard.

From the perspective of FIFA's human rights responsibilities, it continues to be essential to seek to ensure the personal safety of the women complainants involved from direct threats that have been made against them, also in the context of threats made against their families, and to carefully consider their interests and needs given the stress involved in further proceedings. We recognize that FIFA has worked closely with FIFPro (the global football players' union) and with the women's legal counsel and advisors in support of these objectives to date, and is committed to continuing to do so.

We discussed in some depth the handling by FIFA of the overall situation in our October Board meeting, while respecting the fact that various actions are continuing at the levels of both FIFA and CAS and that this naturally imposes restrictions on what FIFA can share with us and on any public discussion by us of the case. We will continue to engage more generally with FIFA on how FIFA's current grievance architecture can be strengthened or supplemented in order to better address cases of severe human rights harms from the perspective of users of the system, and what other kinds of measures should be considered by FIFA, including in relation to ongoing support for survivors. We intend to make further recommendations in this area as part of our focus on players' human rights and respect for women at all levels of the game in 2020.

Discrimination Against Women in Iran

In our April report, we urged FIFA to act on our open recommendation to use its leverage with the Football Federation of the Islamic Republic of Iran (FFIRI) and set a measurable framework for compliance by its Member Association with the FIFA Statutes, specifically Arts 3 and 4, in relation to the ban on women attending sporting matches involving male competitors in Iran.⁴ The courageous advocacy by a number of women, particularly the leaders of the Open Stadiums group, and the significant risks that individual female fans were exposed to, including being detained and harassed by security forces when they tried to attend matches earlier this year, all highlighted the need for urgent action by FIFA. In what has rightly been described as a tragedy, one of those fans, 29 year-old Ms Sahar Khodayari, died of severe injuries in September after setting herself alight following a court appearance based on her attempts to attend a match in March 2019. At the same time, we recognized that FIFA's leverage would need to be exercised carefully and that, whatever actions FIFA took, it would need to be alert to the fact that it might increase the risks to individual women.

In June, the FIFA President wrote to FFIRI asking for a timeline of actions by the Federation and the state authorities that would result in all women that wished to do so being able to buy tickets and attend the Iran-Cambodia FWC 2022 qualifier in October, and acknowledging FIFA's responsibility under its own Statutes to make progress on this issue. In the lead up to the match, FIFA sent a team of staff with responsibility for match organization, security and human rights to discuss all aspects of the preparations with the Federation, and also had a team on the ground during the match. Despite FIFA's clear public statements that all women should be allowed to attend, its positive engagement with FFIRI and its use of quiet pressure, the authorities maintained a cap on the number of women, and imposed restrictions on women journalists who wished to report on the match, particularly photojournalists. Around 4,500 women attended the match. Female fans who were able to attend nonetheless reported on the significance of this step, especially given the challenging context. There were no significant security incidents and limited evidence of intimidation.

We have urged FIFA to build on its increasingly strong public statements, and actions on the ground, in continuing to push for full compliance by FFIRI. This includes removing any cap on the number of seats available for sale to women, ensuring there is no further harassment by security forces of women seeking to attend matches, and ensuring that the same measures are extended to national league matches. Ms Khodayari's death and the ongoing risks to other female fans demand a continued commitment by the organization to fully and finally ending the ongoing violations of Article 4 of the FIFA Statutes.

⁴ Our original recommendation on this from September 2018 is available at <https://img.fifa.com/image/upload/hw134aljrosbxevkvwvh.pdf>, recommendation R 60, p 25. The recommendation states: "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."

2. Tournaments

FIFA World Cup 2022 in Qatar

The Board benefited from the participation of senior representatives of the Supreme Committee (SC) in our October meeting. We were joined in person by the Executive Director of Workers' Welfare, Mr Mahmoud Qutub, and by phone by the Secretary General of the SC, Hassan Al-Thawadi. We welcomed the clear progress that the SC continues to make regarding respect for workers' rights, and the evolution in the SC's approach to one that is centered on the experiences and perspectives of workers on its sites and on supporting voice and remedy for them – while recalling that true freedom of association is still not recognized in Qatar. The SC's ongoing collaboration with Building and Woodworkers International (BWI) has clearly played a role in this evolution.

In particular, we noted progress in:

- The SC's direct engagement with sub-contractors to address impacts on workers where the main contractors are not sufficiently responsive, and the deliberate strategy to decrease the number of tier 3 contractors, concentrating accountability with the main contractors;
- The positive impact for migrant workers on SC sites of the SC's decision to require its contractors to reimburse workers for fees associated with recruitment. If the SC can ensure that contractors continue this commitment once workers are demobilized, this program should be on track to outpace the leading examples from the private sector of similar reimbursement schemes;
- The SC's plans to deepen its efforts on ethical recruitment, including working with its independent evaluation partner, IMPACTT, to extend scrutiny into source country recruitment processes;
- The integration of independent investigation into the SC's standard investigation procedure for work-related fatalities;
- The extension of the SC's Worker Welfare Standards, which currently reflect leading practice in Qatar, to its engagement with hotels.

As stated in our last report, we previously advised FIFA on how to strengthen its joint Sustainability Strategy for the tournament with the SC and the new joint venture, Q22, which will be responsible for delivering the FWC 2022. The strategy represents the first time that FIFA has clearly articulated its responsibility in connection with impacts that are linked to the construction and operation of World Cup stadia and facilities, in line with the UN Guiding Principles. While the strategy was finalized early in 2019 and was being implemented in practice, its publication was significantly delayed. In our view, this led to a vacuum during 2019 in terms of stakeholders' understanding of what FIFA's human rights commitments were and how it intended to meet its own responsibility in close collaboration with, but distinct from, the SC's role. We hope that the publication of the Strategy in early 2020 can help to quickly close that gap.⁵

There is huge potential for FIFA to have a significant and transformative impact on conditions for a large number of workers in Qatar, as part of the legacy of the FWC 2022. Our recommendations from our April report (specifically R66 - R70) focused on steps that we believe should be prioritized for action by FIFA within the broader framework of the strategy.⁶ We have consistently urged FIFA to take a leadership role regarding these recommendations; we are pleased that FIFA intends to use enhanced leverage in 2020 in relation to several of these issues. Opportunities for leadership and legacy are even clearer now with the Qatari

⁵ Available at <https://www.fifa.com/about-fifa/who-we-are/news/fifa-and-hosts-qatar-present-first-ever-joint-fifa-world-cuptm-sustainability-st>.

⁶ Available at <https://resources.fifa.com/image/upload/third-report-by-the-fifa-human-rights-advisory-board.pdf?cloudid=sxdtbmx6wczrmw1k9rcr>.

government's formal announcement in October to move forward the full abolition of the kafala system and introduction of a non-discriminatory minimum wage based on a joint study by the ILO and the Ministry of Administrative Development, Labor and Social Affairs (MADLSA).⁷ FIFA's plans to add capacity to its team in Qatar over the coming months, including on human rights, should position it to play a more proactive role, alongside the SC, in 2020.

In particular, we have emphasized the urgent need for FIFA to act on the continuing stakeholder and broader public concern about the number and nature of "non-work-related deaths" occurring in connection with FWC 2022 construction and more broadly in the country. We note that currently the SC is the only major Qatari entity transparently publishing a record of these deaths. The norm in Qatar is that the attending doctor will issue a death certificate and the body of the loved one will be returned immediately to their family; no autopsies are conducted. This has led to speculation over the possible causes of sudden or unexpected worker deaths and has prompted the SC to pre-screen workers in order to identify, track and treat any underlying chronic medical conditions, such as diabetes. The recent publication of an expert study on heat stress commissioned by the ILO, together with MADLSA and the SC,⁸ provides an opportunity for FIFA to act on the Board's recommendation (R69) that FIFA should support a discussion on this subject involving key actors in Qatar, including the ILO, as well as concerned stakeholders and independent experts, with the aim of generating further understanding and defining appropriate actions and measurable outcomes.

Beyond issues primarily affecting workers, we also urge FIFA to deepen its engagement with the SC on our recommendation R72 regarding the need to take deliberate steps, informed by expert stakeholder perspectives, to comprehensively address risks to individuals in connection with the tournament based on their actual or perceived sexual orientation or gender identity. FIFA has taken some steps in this regard already, including regarding the training of security forces and engagement at the political level. However, the published Sustainability Strategy, while reiterating FIFA's commitment to non-discrimination, including on the basis of sexual orientation (though not explicitly on the basis of gender identity), does not provide further detail on how risks specific to LGBT+ individuals will be mitigated.

FIFA Club World Cup 2021 in China

As we state in our Key Messages to FIFA above, we like many other stakeholders were concerned by the awarding in October of the expanded FIFA Club World Cup for 2021 to China without appropriate human rights due diligence prior to the decision. The lack of any clear communication about how the organization intended to manage human rights risks at the press conference and immediately following the announcement deepened these concerns. We understand that FIFA intends to include provisions on respect for human rights in the host agreement with China, that FIFA will take the lead in carrying out a human rights risk assessment, and will then jointly develop a strategy to address them with its counterparts in the Chinese Football Association. While these steps are welcome, they do not address the failure to robustly assess predictable human rights risks as part of the process of awarding the tournament in the first place and to maximize FIFA's leverage in discussions with its partners at that stage about possible mitigation measures. The fact that the decision happened on a tighter than normal timeline does not change the expectation that some appropriate form of human rights due diligence will still be carried out.

As we state clearly above, and have repeatedly sought to reassure FIFA's leadership about, the purpose of FIFA's human rights commitments is not to prevent the organization from going to or engaging with specific countries, whether as hosts of its tournaments or as Member Associations. That would directly conflict with its role as the global governance body for football.

⁷ See https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_724052/lang--en/index.htm.

⁸ See https://www.ilo.org/beirut/projects/qatar-office/WCMS_723539/lang--en/index.htm.

Rather, the purpose is to require FIFA to engage with an informed understanding of the human rights risks the organization may be connected to, and a credible assessment of what FIFA can expect its partners to do about them. Where FIFA has willing partners, and is committed to using its own leverage, we have seen that substantial progress is possible. Where that is not the case, FIFA can still make the decision to engage, but should do so with eyes wide open and a realistic mitigation strategy, in the same way the organization would handle any other type of risk – be it financial, operational or reputational.

Where significant human rights risks may be involved, FIFA also needs to be prepared with a mature approach to communicating about how it intends to handle those risks, in order to help normalize discussion of human rights as part of all commercially or strategically important decisions. In doing so, FIFA can help reassure its Member Associations and the Confederations that this is not about singling out some on the basis of human rights concerns but instead about considering human rights with the same level of professionalism and due diligence as more traditional technical risks are currently handled.

3. Thematic Issues

Embedding Respect for Human Rights in Football Governance

Resourcing the Human Rights Function Appropriately

Over the past year, the Board has seen FIFA’s human rights team tackle a series of complex and urgent demands – from Hakeem Al-Araibi’s detention in Thailand, to the Afghan women football team’s experience of severe harms, to engaging with the Iranian Federation on lifting the ban on women attending men’s matches. The number, severity and pace of urgent cases that the team has had to respond to has stretched existing resources, making FIFA’s commitment to add further staff capacity in this area a vital one. While progress has been made in continuing to engage with other departments to embed understanding of FIFA’s human rights responsibilities at operational level within the Administration, and in ongoing work in relation to key tournaments (including the FIFA Women’s World Cup 2019), more limited progress has been made on the task of embedding FIFA’s responsibility to respect human rights at the strategic and political levels of the organization, which we discuss further below.

On the topic of engaging Member Associations, in the period since our last report, FIFA has also finalized and launched an important new resource: “FIFA Guardians: Child Safeguarding Toolkit for Member Associations”.⁹ The toolkit is a leading example of guidance by a sports body that is fully aligned with international human rights standards – in this case, the Convention on the Rights of the Child. As FIFA seeks to drive the toolkit into the policies and practices of Member Associations, it is essential that the organization commit adequate human and other resources to this effort. We understand that FIFA is in the process of appointing additional staff to the new Safeguarding Department, which is a welcome development.

In September, FIFA announced a significant change in how it organizes its human rights work. As noted above, it created a new Social Responsibility and Education Division, which integrates the Sustainability and Diversity Department. The Division sits alongside the FIFA Foundation, established in March 2018. 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. This transition creates opportunities for FIFA’s human rights work, particularly through the personal

⁹ See <https://www.fifa.com/development/fifa-guardians/#web-07>.

commitment of FIFA's new Chief Social Responsibility and Education Officer, and her position on the Management Board, as well as the additional capacity being made available to work on human rights issues.

At the same time, and as in any other organization, locating the human rights function alongside or in close association with the Foundation risks signaling that human rights is not seen as 'core business' and can be addressed through separate projects or programs, rather than as an essential element in day-to-day operational and political decision-making across all areas of the house. In our view, taking advantage of these opportunities, and mitigating this perception, will require not only strengthening the resources in the new Division dedicated to meeting FIFA's human rights responsibilities, which we understand FIFA intends to do, but also developing a clear strategy for the Division's work (and how it relates to the work of the Foundation), and consistent leadership and messaging about the importance of embedding or mainstreaming human rights throughout the Administration. FIFA has committed to work on embedding its human rights responsibilities in Pillar 1 of its "Human Rights Approach" in the FIFA Human Rights Policy, and in the personal commitment to promote the policy signed by the President and Secretary-General at the start of the document. This commitment needs to continue to be translated into clear expectations about how human rights connects to the different roles and responsibilities that exist across the organization, at all levels.

Accountability on Human Rights at the Political and Governance Level

While we have appreciated the personal engagement of members of the Governance Committee in our work as the Advisory Board, it remains very unclear what role the Governance Committee overall is willing and able to play in meeting its statutory role to "advise and assist" the FIFA Council on human rights matters – and what role FIFA's leadership and the Council want it to play. We have repeatedly asked this question and have received different answers, leading us to now raise this concern publicly.

FIFA has now committed to us that it will strengthen the existing briefings to and engagement with the Governance Committee on human rights by the Administration, which is positive. However, in our view, more is needed: priority human rights matters should be regularly discussed by the Governance Committee, drawing on additional expertise where needed; the key risks and opportunities should be clearly explained by the Chair in the reports the Committee provides to the FIFA Council; and the issues should be actively discussed by the Council as a routine part of how FIFA evaluates key political and strategic decisions.

FIFA should be able to communicate publicly about, for example, the number of times that human rights matters have been discussed by the FIFA Council as evidence of how the organization is embedding its human rights commitments at the top levels. This kind of signal is particularly important as FIFA moves forward with building awareness of and commitment to human rights within its Member Associations and within the Confederations – not least because the FIFA Council includes representatives from both Member Associations and the Confederations. If the FIFA Council is not carrying out its "strategic and oversight" role on human rights, it needs to be held accountable by the Audit and Compliance Committee, and ultimately by the Congress.

A Roadmap for Embedding Human Rights

In our view, FIFA now urgently needs an overarching organizational roadmap or strategy on embedding human rights that integrates the need for robust management of the organization's salient human rights risks, as currently set out in paragraph 5 of FIFA's Human Rights Policy, with the positive social contributions that it seeks to make through football in specific areas (particularly on health, education and support for refugees) through the work of the Foundation. Such a strategy – and clarity at the top levels of the organization that working on human rights means working with equal commitment and comfort on human rights risks as well as human rights opportunities – can help ensure that FIFA's human rights work does not drift back towards a more traditional understanding of 'CSR' or sustainability, focused on doing good but without adequate attention to addressing the most severe risks

to people connected to FIFA's operations and those of its partners. This would be problematic because there is no such thing as 'offsets' when it comes to human rights. Additional positive contributions to an individual or group's enjoyment of their human rights cannot outweigh a failure to address specific risks to human rights connected to FIFA's operations – including through the tournaments it organizes and its broader governance role.

In fact, addressing salient human rights risks connected to FIFA's operations may often be the most effective way of maximizing FIFA's positive impact in peoples' lives. For example, as noted above, FIFA can contribute to a transformative change in Qatar if it decides to put its full weight into supporting the cascading of the advancements in workers' rights that have happened on SC sites outwards into infrastructure, services and other sectors (such as hospitality) connected to the FWC 2022, in line with the commitments in the Sustainability Strategy.

To ensure that FIFA's political and strategic decision-making remains grounded in the organization's human rights responsibilities under Article 3 going forward, we have one main recommendation to make, addressed to FIFA's senior leadership – the President, Secretary General and Deputy Secretary General who has been acting in her stead.

R 79 FIFA should develop and commit to the implementation of a human rights roadmap to guide the further embedding of Article 3 and its Human Rights Policy into all aspects of the organization's decision-making, with a focus on the political and governance level. The roadmap should:

- a) Establish 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 and Audit and Compliance Committees 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;
- b) Ensure appropriate staffing and other resources in the new Division to carry out FIFA's human rights commitments;
- c) Set a target in early 2020 for rolling out updated training on human rights for all leadership and official positions on FIFA's statutory human rights responsibilities;
- d) Establish a pathway and milestones for integrating human rights commitments into Member Associations' statutes, promoting human rights policies and practices at the Member Association level, and raising awareness with Confederations about their own human rights responsibilities.

Looking Ahead

In the first half of 2020, the Advisory Board will continue our work and engagement with FIFA on a limited number of thematic issues, including:

- Players' human rights;
- Progress on FIFA's strategy regarding women at all levels of the game, including strengthening grievance mechanisms; and
- Implementation of the new safeguarding toolkit.

As stated above, we will also monitor and evaluate FIFA's efforts to adopt and implement a roadmap to ensure the embedding of its human rights commitments.