

1. Personal information

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2. Summary of evidence

UNICEF is the world’s leading organisation for children, working across 190 countries and territories to promote the rights and wellbeing of every child, based upon the **UN Convention on the Rights of the Child (UNCRC)**.

UNICEF provides technical expertise and advice to the world’s leading sports bodies, local organising and bid committees to ensure children’s rights are respected across global sport and the lifecycle of Mega-Sporting Events (MSEs), and they have the right to participate in sport in a safe and enjoyable environment as highlighted in Article 31 of the UNCRC. UNICEF is on the Advisory Council of the Centre for Sport and Human Rights, and Unicef UK is the founder of the International Safeguarding Children in Sport initiative, which developed the International Safeguards for Children in Sport. It is in this capacity that we are submitting evidence to this inquiry.

Key Recommendations:

- Global sports bodies governance, management systems and operations should be aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and complementary Children’s Rights and Business Principles. They should conduct human rights due diligence to identify, prevent, mitigate and where necessary remedy adverse impacts on human and child rights in the sporting world, and include human rights criteria within MSE bid and hosting documents.
- Local Organising Committees (LOCs) and event commercial partners should be required to conduct human rights due diligence. Sports bodies, host governments and LOCs should adequately resource these efforts to ensure their efficacy.
- Children should be consulted as part of due diligence processes, and offered opportunities to participate meaningfully in all planning, decision-making and the development of safeguarding in and around sport and sporting events.
- Sports bodies and relevant sport stakeholders should make use of the tools developed by Unicef UK and our partners to support this work; e.g. [Championing Human Rights in the Governance of Sport Bodies](#), [Every Child’s Right to be Heard](#), and the [International Safeguards for Children in Sport](#).
- To enable all children and young people to enjoy the “right to play” in an environment free of all forms of violence and abuse as highlighted in the UNCRC, safeguarding should be built into all aspects of sport, especially for youth events.

- The UK Government should provide appropriate guidance to upcoming UK-event stakeholders on how to implement the UNGPs, and integrate human rights criteria into public procurement guidelines.

3. Call for evidence questions

a) Sports Bodies

Q: Why is there a need for sports bodies to integrate human rights into their bidding, planning and other processes?

Research by UNICEF and from our partners, including academics and civil society organisations, has linked Major Sporting Events (MSEs) and sport in general to negative human rights impacts, including abuse of child athletes and volunteers, child labour, and the forced relocation of families from their homes leading children to be displaced from their schools, communities and essential services. UNICEF fears if these impacts are left unchecked, especially by the responsible sports bodies, that they risk outweighing the positive impacts commonly attributed to MSEs such as increased employment and learning opportunities, regeneration of housing, urban areas, leisure and sport facilities - all of which are of particular benefit to children.

Sports bodies have a duty (under the Universal Declaration of Human Rights) to promote respect for people's rights, among them the rights of athletes, workers, community members and others affected by their operations, many of whom are children. Those sports bodies constituted as private companies have an additional responsibility under the UN Guiding Principles on Business and Human Rights (UNGPs) to respect human rights and avoid causing harm. Significantly, the UNGPs stress the need to respect the rights of vulnerable groups like children, and to demonstrate this by putting processes in place to identify, prevent and mitigate, and where necessary remedy potential and actual adverse risks to all vulnerable groups including children. The UNGPs are elaborated in the [Children's Rights and Business Principles](#) (CRBPs) which spell out the specific actions enterprises (including sports bodies) should take to comply with the UNGPs and avoid specific harm to children across their operations.

Sports bodies should proactively align their activities - particularly MSE bidding, host contracts, planning and delivery - with the UNGPs and CRBPs and communicate their efforts widely, as a credible means of mitigating risks of human and child rights abuse and to reduce the need for damage limitation, and to rebuild trust internationally.

The UK Government should provide all global sports bodies headquartered in the UK with appropriate human and child rights guidance to support this alignment, including the Commonwealth Games Federation, the International Netball Federation, the Rugby League International Federation, the International Tennis Federation and World Sailing. UK Sport should provide similar guidance to UK National Governing Bodies.

Q: What approach can sports bodies take towards marginalized groups such as: people with disabilities, ethnic minorities, women, LGBTI athletes, and others?

- What safeguards can be put in place to protect these people?
- Are these being implemented in practice?
- Are affected groups engaged in the process to ensure effectiveness?

To date the practical implementation of rights-based and safeguarding approaches that respect marginalised groups such as children is sporadic, and varies greatly across different sizes and types of sports bodies. This variation reflects the different levels of impact different sports bodies have on children according to their specific roles, relationships, and the extent of their direct contact with children, and how far they even recognise that they have human and child rights responsibilities (noting that ‘the corporate responsibility to respect human rights’ is relatively new concept for the business community in general).

Multi-sport Sport Bodies such as the International Olympic Committee (IOC) and the Commonwealth Games Federation (CGF), **should take approaches towards marginalised groups that:**

- **Embed human rights due diligence in line with the UNGPs and CRBPs within their governance, management systems and headquarters operations, encompassing a specific child rights approach;**
- **Maximise their leverage over third parties with whom they have business relationships, particularly in the delivery of large tournaments, to ensure that their partners also implement the UNGPs and CRBPs.**

Such parties include national affiliates like the National Olympic Committees and Commonwealth Games Associations, International Sports Federations (IFs) and National Sports Federations, Local Organising Committees (LOCs), alongside host public bodies, and commercial partners, e.g. licensees, suppliers, sponsors and broadcasters.

Single-sport governing bodies, e.g. FIFA, IAAF and UK bodies like the International Netball Federation, the Rugby League International Federation, the International Tennis Federation and World Sailing, need to take the same steps based on their own potential human rights impacts and third-party relationships, but have additional responsibilities to make grass-roots sport rights-compatible and effectively safeguarded.

Consultation and participation:

Since many of the child rights impacts linked to MSEs are hidden, it is of paramount importance that children are properly consulted and able to participate in planning and decision-making around sport and sporting events and the development of safeguards to ensure that potential adverse impacts are identified, prevented and where necessary mitigated or remedied. In addition, children have a right to be consulted meaningfully on issues that affect them. Children’s views should be embedded in due diligence implementation and not left to chance or depend on sustainability frameworks that are non-rights specific. When involving children, special considerations and processes should be put in place that are informed by technical experts with experience of helping the voices of young people to be heard. UNICEF has developed guidance on how to engage children and stakeholders on children’s rights in a meaningful way:

- [Every child’s right to be heard](#)
- [Engaging Stakeholders on children’s rights](#)

These tools should be used by sports bodies to make sure children’s views are properly considered right from the start of the planning processes.

Beyond MSEs, sports bodies should take coherent and strategic action to ensure the fullest possible participation of children and young people and other historically overlooked groups in sports activities, and in the governance, management, administration, officiating and coaching of sport.

Safeguarding:

Sports bodies and their partners should implement a rigorous approach to safeguarding, to identify, prevent and mitigate risks posed to children, including at MSEs. In 2017, Unicef UK technical experts supported the Bahamas 2017 Commonwealth Youth Games' host actors, LOC and Government counterparts to develop a child safeguarding policy and implementation plan which was endorsed by the CGF. The tangible benefits for young athletes included a 24/7 safeguarding presence at all sports venues and athlete accommodation, and addressing issues ranging from mental and physical health crises to personal security. This process generated a positive legacy of strengthened Bahamian safeguarding capacity, consolidated through Unicef UK's training-of-trainers in 2018. Unnecessary risks to children arose however (e.g. safeguarding officers had to intervene to prevent a team official prematurely discharging an athlete from hospital so as to compete) due to the CGF not requiring or implementing rights-based systems from the outset or adequately ensuring these cascaded to the visiting teams. **Sports bodies should lead on safeguarding and ensure it is embedded throughout the sports they are responsible for, including across the MSE life-cycle and in particular for youth sport events. They should require LOCs to implement a single clear approach to safeguarding, to ensure all relevant groups, including visiting team officials and athletes, are fully informed about safeguarding protocols and requirements.** Unicef UK is available to give more evidence on this example.

Children and young people should be able to take part in sport in an environment free of all forms of violence and abuse, in keeping with their "right to play" enshrined in the UNCRC. Safeguarding needs to be built into all aspects of sport to make sure this happens. Unicef UK, working with the Child Protection in Sport Unit (CPSU) in the UK and partners from across six continents, has developed the [International Safeguards for Children in Sport](#) that comprise eight key Safeguards ranging from policy and systems development, to risk assessment, to monitoring and evaluation. UNICEF knows that safeguards can protect child athletes from violence and abuse, from grassroots to elite level sport. Good practice however is still not universal and wide variations exist across different sports and geographies around implementation and effectiveness. **New approaches that involve athlete commissions and player unions in the development of declarations of rights and safeguards, provide promising models of meaningful involvement and should be harnessed.**

b) Local Organising Committees

Q: Why are human rights considerations important for local organising committees (LOCs)?

- What challenges are there in implementing human rights and meeting expectations of various stakeholders?
- What support can be given, if any? By who?

Based on Unicef UK's findings from research and first-hand experience with sports bodies and LOCs in various contexts, we assess that LOCs face similar rights-related challenges and considerations to sports bodies, including around effective consultation of stakeholders, meaningful participation of children and at-risk groups, and safeguarding (see above). However, as LOCs are typically accountable to the event-awarding sports body and to domestic stakeholders, they face unique and sometimes competing sets of expectations, and are frequently under acute time pressure and budgetary constraints. LOCs will usually need to comply with domestic regulations (e.g. on health and safety, non-discrimination), and unless the awarding sports body and/or host government additionally demands and resources a rights-respecting approach, LOC capacity to implement effective human rights due diligence is likely to be compromised.

Sport bodies can and should support LOCs by including human rights and safeguarding requirements within event bid criteria and host contracts. By doing so they cement the importance of human rights within the event, and exert leverage over host governments, LOCSs and event commercial partners to conduct and resource effective human rights due diligence throughout MSE preparations, delivery and legacy, and across associated supply chains; thus helping to prevent human rights risks, including those to children, from escalating into actual harms and reducing the need for remedy.

Host public authorities can and should support LOCs by allocating budgets and resources that facilitate human rights due diligence processes, and by providing UNGPs guidance to commercial and other partners (see below).

To date only a handful of LOCs have in practice volunteered, and/or been compelled by their awarding sports body to take a rights-based approach, because no sports body included human rights in bid criteria and host contracts until 2017 (applicable for events after 2022). Thus LOCs that have been proactive on human rights so far have done so whilst facing the uphill task of squeezing rights-related efforts into pre-existing systems, budgets and capacity.

Sports bodies and host public bodies can and should also support LOCs by signposting them to technical expertise, resources and tools, e.g. those available from UNICEF, the [Centre for Sport and Human Rights](#), the International Safeguarding Children in Sport initiative, domestic human rights and safeguarding experts e.g. National Human Rights Institutions, CSOs and academic institutions.

Q: What are some of the lessons that can be learned from previous UK hosts? Eg. London 2012? Glasgow 2014?

The London 2012 Olympics and the Glasgow 2014 Commonwealth Games only took an ad-hoc approach to their human rights due diligence as both were awarded hosting rights before the UNGPs were formally adopted (2011). This was also true for the England 2015 Rugby World Cup. Nonetheless, important rights-

based lessons from the London 2012 organisers (LOCOG) include: the ground-breaking MSE sustainable sourcing requirement which complies with the ETI Base Code/ILO core conventions (replicated and built on by the Glasgow 2014 and subsequent MSEs globally), which sought to confront child and sweatshop labour in supply chains; LOCOG's pioneering complaints and dispute resolution mechanism for its sourcing code (supported by Ergon Associates and an independent oversight committee); and the games-time grievance resolution protocol developed between LOCOG with the TUC and ACAS for the UK-based workforce and contractors. Setting up the *Commission for a Sustainable London 2012* watchdog bolstered accountability; this good practice has still be replicated.

Glasgow 2014 - which had an official partnership with Unicef UK - addressed several shortfalls in London's approach. By reaching out to expert human rights groups, including Unicef UK, IHRB and the Scottish Human Rights Commission, Glasgow 2014 became first MSE LOC worldwide to publish a human rights policy and to report on its efforts; to pay a Living Wage to its UK-based workforce; to contractually require factory disclosure by suppliers to facilitate effective monitoring and accountability of its supply chains (left too late in London); and to promote child rights in Scotland and across the Commonwealth (reaching 11.7 million children through programmes supported by fundraising from the Games). Publicity and audience reach surrounding MSEs can generate significant support and funds for rights and development-related projects at home and abroad.

Q: How can upcoming UK hosts apply these lessons? Eg. Birmingham 2022?

Upcoming UK hosts (LOC and public bodies), including organisers of the 2019 Cricket World Cup, 2021 Rugby League World Cup and the Birmingham 2022 Commonwealth Games **should learn from London and Glasgow's good practice (see above)**, by drawing on the [London 2012 Learning Legacy](#) website's resources, and relevant learning within the UK sports industry and event-organising sector. **Above all they should also proactively engage with human and child rights experts based in the UK and worldwide to a) identify and avoid past pitfalls** (human right impact evaluation in sport remains weak), **and b) build on more recent, emerging human rights due diligence good practice. Taking prompt, strategic action will be critical**; too often problems arise because the rights-based agenda is left as an afterthought.

Unicef UK has an established partnership with the CGF on human rights and child safeguarding¹. **Upcoming UK hosts**, especially the Birmingham LOC, the UK Government, Birmingham City Council, and other key stakeholders **should leverage the existing UUK-CGF partnership and harness Unicef UK's technical expertise to ensure they go beyond compliance on human rights and exhibit global leadership. They should prioritise meaningful participation of children in planning and legacy from the outset; assess, address, and remedy as needed, actual and potential adverse human rights impacts through human rights due diligence; pilot**

¹ Unicef UK advises the CGF it on all aspects of its human rights work, including its policy and strategy, revisions to bid documents and host city contracts for the Commonwealth Games and Youth Games, and capacity-building of the CGF's management team and its LOCs and the Commonwealth Games Associations.

new child-friendly remedy channels; establish partnerships for technical support and training; and ensure appropriate budgets and staffing are place to deliver the above.

c) Governments

Q: Should the UK government be considering regulating the above types of business operations?

The UK Government should first carry out a limited assessment - engaging expert stakeholders like Unicef UK, to determine if people's rights will be better served by regulating, or instead by providing clear human rights due diligence and safeguarding guidance. It should be noted that many sports bodies and LOCs are registered as limited companies, and thus would be bound in future, by broader human rights due diligence regulation, currently under governmental consideration

The UK Government should at a minimum meet its obligations to protect human rights, affirmed in the UNGPs, by:

i) Encouraging UK sports bodies and LOCs to conduct their own human rights due diligence and to include human rights due diligence requirements in all their commercial contracts, stressing both the human rights and commercial imperatives for doing so

ii) Providing appropriate guidance to all MSE corporate partners (e.g. suppliers and contractors) **on how to implement the UNGPs**. A good practice example from London 2012 was the [Olympic Delivery Authority's Balanced Scorecard](#) process (which included elements of capacity building) for its construction partners that reportedly improved health and safety and inclusivity practices in parts of the UK construction industry.

iii) Establishing public procurement criteria for UK event-related buying of goods and services that align with the UNGPs, the UN Convention on the Rights of the Child (UNCRC) and other relevant international human rights-related standards, to ensure that all firms bidding for public contracts implement human rights due diligence. The Government should start with the upcoming 2019 Cricket World Cup, 2021 Rugby League World Cup and 2022 Commonwealth Games being hosted in the UK.

d) Corporates

Sponsors:

Q: What leverage can sponsors have over sports bodies, LOCs and others when it comes to ensuring respect for human rights?

Sponsors, together with Broadcasters, provide the bulk of investment for sport. As such, particularly where they act collectively, these companies **should exert leverage over sports bodies and LOCs to conduct human and child rights due diligence, and require robust child safeguarding**. Sponsors that have contracts with a sports body and/or LOC to supply goods and services should also lead by example, and conduct human rights due diligence in line with the UNGPs across all their business operations.

Suppliers:

Q: What are the human rights issues commonly found in sport supply chains?

- How can these be identified?
- What are some of the challenges to dealing with these risks and what can be done to address them?
- To what extent can these be exacerbated by a mega-sporting event?

Human and child rights risks in sport supply chains are diverse, and reflect the breadth of the supply chain, which encompasses raw materials (e.g. for construction), metal ore (e.g. for medals), food products, services, textiles and toys for merchandise and sporting goods. For a full picture see [White Paper 2.2 Procurement and Human Rights in the Sport Context](#).

Child rights abuses in supply chains impact many rights articulated in the UNCRC and extend beyond familiar concerns regarding child labour (Article 32) in merchandise and sporting apparel manufacture or artisanal mining for metal ore. Conducting human rights due diligence that integrates a child rights approach, is the first step to identify and act on the full range of child and human rights risks at stake. UNICEF has conducted a number of studies and made recommendations on child rights impacts by certain industries including: [apparel and footwear](#), [palm oil](#) and [travel and tourism](#). A forthcoming synthesis report for global supply chains,² reveals common challenges for children's rights across industries including:

- A child's right to health and health services (Article 24), to education and to go to school (Article 28), and to play (Article 31) may go unfulfilled due to poor or exploitative working conditions of the child or their parents/carers.
- Children may not enjoy an adequate standard of living (Article 27) or adequate care if their parents/carers are denied a decent wage or work long hours; may be exposed to risks of abuse and exploitation (Article 34) if they are left home alone or pressured to look for work opportunities to bolster the family income.
- Damage to the environment by suppliers, such as contamination of local water sources with pesticides and agrochemicals, may also expose children to life-long health risks as well as limit their access to essential resources.

The typically short-time frames associated with MSEs can compound normal commercial pressures upon all suppliers and incentivise poor rights-based performance in order to meet deadlines.

e) Athletes

Q: What are the unique challenges faced by athletes in realising their human rights?

The challenges faced by athletes are many and varied and depend on a range of factors including age, sport and level of professionalism. However, there are common challenges connected with lack of power – over their careers, their bodies and their voice. Decisions over athletes' futures are usually, often within an opaque

² Unicef (forthcoming) "Children's Rights in Global Supply Chains: Synthesis Report". For more information about the impact of global supply chains on children's rights see <https://www.unicef.org/csr/global-supply-chains.html>

structure with limited space to raise objections. Athletes are often dependent on their own image rights as a source of income, which can place limits on their freedom of speech, through both written and unspoken contracts.

UNICEF research '[Protecting Children from Violence in Sport](#)', identified that child athletes are particularly vulnerable to violence and abuse. This increases when a child enters the pre-elite stage of their performance pathway, when power over their future prospects in sport is often held by a few individuals, and training schedules take children away from other social safety nets which could have afforded them some protection.

Certain sports pose particular risks, for example football has been linked to examples of child trafficking and commercial abuse; or swimming, with a number of sexual abuse cases documented in the past.

Bullying and hazing rituals have also become part and parcel of certain sports, subjecting athletes to degrading initiations that often equate to sexual or physical violence.

There are also risks linked to the physical nature of sport, such as being forced to train whilst injured, being forced into painful positions by coaches, the risk of concussion and other harm, or age-inappropriate activities. There are also risks related to a child's right to privacy and to self-identification, where personal medical information becomes public, or their gender identity is openly questioned.

Q: What provisions can be made for particularly vulnerable athletes including child athletes and LGBTI competitors?

This inquiry should look towards the [International Safeguards for Children in Sport](#) which sets out 8 measures that all organisations should develop to make sport safer for children. These are:

1. Develop a safeguarding policy
2. Implement procedures to respond to concerns about a child
3. Identify where and how advice and support will be provided to staff and athletes
4. Understand and take action on risks to children
5. Develop guidelines on acceptable behavior
6. Safe recruitment, training and communication
7. Develop how you work with partners so their activities are also safer
8. Monitoring and evaluating the impact on children's safety in sport

Sometimes children do not understand they are being abused, are less likely to disclose what is happening, or do not have the vocabulary to describe how they feel. Adults have a duty of care towards children and all adults have the responsibility to recognise and respond to suspected abuse. **Sports bodies should use tools like the International Safeguards for Children in Sport to transform their culture to one where child athletes are children first and athletes second.**

When developing provisions for child athletes, organisations should also ensure that special measures are in place to ensure their meaningful participation, including the [9 Basic requirements for effective and ethical participation of children](#). These requirements, developed by UNICEF and Save the Children set out best practice for engaging children and young people and should always be incorporated to make sure children and young people can contribute positively to decisions that affect the realisation of their rights and wellbeing.

Q: How significant is the risk of modern slavery in sport? What aspects of sport and its supply chain are most at risk?

In sports with significant global revenue, in particular football, we have seen the increasing commodification of players. Practices such as third party ownership and restrictive youth contracts, lead to talented children being treated like ‘raw materials’, who are refined through training and experience into the ‘finished article’ - essentially a supply chain of people. Within this, children, particularly those in resource poor settings, are vulnerable to becoming victims of slavery. There are examples of trafficking within football, with children forced to work to pay off debts incurred in travelling to Europe in pursuit of their dreams of a professional contract, as well as vulnerable children being sold into sexual slavery having being trafficked by ‘fake agents’.

In June 2017, UNICEF commissioned research to map the network of actors that are responsible for the recruitment of young players into professional football worldwide, and identify where and how young players’ rights are at risk within this recruitment network. The principle findings include:

- children with an aspiration to become professional footballers make journeys through a fragmented system where there is considerable variation within and between countries in terms of the protection offered to children’s rights
- the commercial structures and practices within football are fundamentally inconsistent with Article 32 of the UNCRC
- existing anti-trafficking frameworks at national and international level are not adapted to respond to football-related trafficking

The research recommends that planning, implementation, monitoring and evaluation of football regulations involving the recruitment of minor players should be informed by an approach that characterises the child as the ‘rights holder’ and places the child at the centre of regulatory frameworks.

The research is now engaged in defining the responsibility that professional football clubs have for young players entering the game, and identifying current good practice in providing protection for children’s rights. In December 2018, Unicef UK will publish **recommendations on the practical steps professional football can take to safeguard the rights of young players.**