

All-Party Parliamentary Group on Sport, Modern Slavery and Human Rights

Session Summaries

July 2019

The Responsibilities of Local Organising Committees

Summary

Research has linked mega-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. If left unchecked, these negative impacts risk outweighing the positive benefits commonly attributed to MSEs such as increased employment and learning opportunities, regeneration of housing, urban areas, leisure and sport facilities.

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. 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. Furthermore, local organising committees are often comprised of both private and public actors and therefore have a responsibility under the UNGPs to both protect and respect human rights. Local Organising Committees (LOCs) also have a contractual obligation with the relevant sports body which can, if necessary, influence laws that affect the event.

What are the Risks?

It has become increasingly important for sports bodies to consider human rights risks when selecting a host city or country, as hosts are more frequently being held to account for their obligations to protect human rights. Recent examples of this include the media attention given to the 2022 FIFA World Cup preparations in Qatar, as well as the 2018 FIFA World Cup, which took place in Russia in June/July 2018,

which faced criticism by the media and other spectators due to reports of human rights violations such as discrimination on the basis of sexual orientation in the country.

Host actors, specifically local organising committees, are responsible for managing risks right the way through the mega-sporting event lifecycle. This lifecycle begins with planning and bidding for an event and ends with legacy. There are 8 major lifecycle phases, and certain risks relevant to each:

- 1. Vision, Concept and Legacy** – Organisers should begin engaging relevant stakeholders, including potentially affected groups to identify some of the issues that are relevant to them so that mitigation plans can be developed from the outset.
- 2. Bidding, Planning and Design** – Stakeholder engagement needs to be put into action and continued to ensure relationships are managed and risks are continuously mitigated. Many sports bodies, including the IOC and FIFA, are now integrating human rights into their bidding requirements, which means potential issues will need to be identified and mitigation plans developed at the earliest possible stage in order to successfully win a bid. One of the key risks at this stage is corruption.
- 3. Income Generation** – Risks in this stage can be reputational for both the companies and the event organisers. For example, a local vendors could be excluded from opportunities to sell their goods to global markets because the vending license went to a global sponsor.
- 4. Sustainable Sourcing** - In the same way that retail, IT and other companies are coming under intense scrutiny for their supply chain practices, consumers are increasingly aware of the practices of sporting goods companies and their supply chains.
- 5. Construction** – This phase is one with a lot of potential human rights risks including: health and safety on construction sites, ensuring workers are paid on time and in full, challenges that come from an often foreign labour force such as potential for trafficking and modern slavery etc.
- 6. Delivery and Operations** – This is often the phase that occurs in the weeks and months immediately before the event and therefore risks are often heightened and varied due to the impending timeline of the event. Risks can include: Increased police presence given the larger numbers of people, crackdown on journalists or other activists, increased risks of trafficking due to short-term, contracted workforce such as caterers and extra hotel staff.
- 7. Competition** – Risks at this stage often relate to the athletes and fans, and can include a “live incident” such as offensive chants from fans.
- 8. Legacy** – Events are almost always sold to local communities as being a benefit to society – this can include improving infrastructure, creating jobs, developing local communities etc. It is important that these promises are actually delivered and that the majority of local people feel this benefit.

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. 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.

Case Study 1 - London 2012

The London 2012 Olympics only took an ad-hoc approach to their human rights due diligence as it was awarded hosting rights before the UNGPs were formally adopted in 2011. 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 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);
- 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 to be replicated.

In terms of the complaints mechanism, this was managed by a third part organization and was for workers producing licensed products – many of which were made in China. The hotline was set up in March 2012 and was active for six months.

Some key lessons learned through the management of the hotline include:

- set up the grievance mechanisms early;
- provide different mechanisms (i.e. technologies) for workers to raise grievances: telephone numbers, text messages, social media, etc;
- provide workers with mechanisms to resolve queries as well as complaints and grievances. Many workers called the hotline with questions about general work entitlements;
- communicate the mechanism clearly, in a language and way that workers understand, to ensure it is accessible to them;
- roll out the mechanism beyond the first tier of contracting;
- ensure the mechanism protects worker confidentiality, but also allows for workers to receive feedback on the steps taken following their grievance.

Case Study 2 - Glasgow 2014

Glasgow 2014 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 the first 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.

Case Study 3 - Qatar 2022

The World Cup is universally viewed as having the power to deliver a lasting legacy and act as a catalyst for change. In the case of Qatar, it is hoped that the workers' welfare programme established by the Supreme Committee for Delivery and Legacy (SC) will leave a social and human legacy for all workers across Qatar, well beyond 2022. The 2022 FIFA World Cup (2022 FWC) was designed to help accelerate Qatar's long-term development goals laid out in the Qatar National Vision 2030 and the National Development Strategy 2018-2022.

The efforts of the SC towards the protection of human rights has resulted in the publication of the Workers' Welfare Standards (WW Standards) – a set of contractually binding regulations stipulating the rights of workers from recruitment to repatriation; development and implementation of a robust due diligence process in the form of a four-tier auditing system and compliance framework; conceptualisation and execution of a multi-faceted grievance platform for workers; and regular public reporting. This framework ensures that the stadiums and infrastructure directly related to the 2022 FWC are built in a manner that protects and safeguards the rights of all workers. The WW Standards clearly set out the SC's requirements regarding the recruitment, employment, living and working conditions for everyone engaged on an SC site, and evolve over time as working practices change. The WW Standards have been developed and updated in consultation with the local business community and numerous civil society groups, including Human Rights Watch, Amnesty International, Building and Wood Workers' International (BWI), Engineers Against Poverty, Humanity United and the ILO.

Additional worker welfare initiatives have included:

- a dedicated training & upskilling programme providing workers with soft skills and technical training;
- a nutrition programme to improve the health of workers and to educate them about the benefits of nutrition and healthy lifestyles;
- a cooling project working with international and local players to identify cooling technology to make workers more comfortable during the hotter summer months.

In addition, the SC has enhanced different elements of the programme including:

- publishing Edition 2 of the WWS in March 2016 based on stakeholder feedback and an assessment throughout their implementation. In 2018, this was further amended to include additional requirements focusing on workers' health and other key areas;
- setup and implementation of a robust compliance & audit programme of the supply chain to ensure that the Standards are being met, applying relevant enforcement measures when issues arise;
- in December 2014 the first public report was published, which has since been supplemented with four additional reports – you can find the full report [here](#);
- appointed an Independent External Monitor in March 2016 to act as the third tier of our four-tier auditing system. To date they have published two independent public reports – the **most recent in March 2018** – highlighting progress and challenges identified in the programme;
- partnered with Building & Wood Workers' International (BWI) in late 2016 to provide an added measure of assurance on our Health & Safety programme, and have since published

a joint public report, in January 2018;

- set up a comprehensive grievance platform for workers to raise their grievances through the establishment of Workers' Welfare Forums (WWF).

Despite this progress, concerns remain including:

- the Worker Welfare Standards only cover a small fraction of the total number of workers (30,000 out of two million);
- the Standards only cover those workers working directly on World Cup sites, meaning those working on transport, hotel construction, or wider infrastructure being built for the World Cup are not covered.

Interim Findings

- Sports bodies can consider human rights from the outset and integrate them into bid requirements, in particular international sports bodies domiciled in the UK such as: The Commonwealth Games Federation, International Netball Federation, Rugby League International Federation, International Tennis Federation and World Sailing.
- Sports bodies and LOCs can be required and incentivised to proactively align their bidding, host contracts, planning and delivery with the UNGPs and communicate their efforts widely, as a credible means of mitigating risks.
- The need to better understand ways that all those working in sport receive adequate human and child rights guidance to support alignment with the United Nations Guiding Principles on Business and Human Rights and the UK Modern Slavery Act.
- When hosting an event, ways in which government can support the LOC by allocating budget and resource to facilitate human rights due diligence processes.