

FIFA 2023 Women's World Cup Human Rights Risk Assessment

DECEMBER 2021



Australian
Human Rights
Commission



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Glossary

<i>Aboriginal and Torres Strait Islanders</i>	Used throughout this report to describe the Indigenous peoples of Australia. In some instances, the term Australia's First Nations peoples is also used. In recognition of the diversity of identities and cultures amongst Indigenous peoples across Australia, plural terms (<i>peoples, histories, perspectives</i>) are preferred.
<i>Brotherboy and Sistergirl</i>	These are terms used for gender diverse people within some Aboriginal or Torres Strait Islander communities. Sistergirls and Brotherboys have distinct cultural identities and roles. Sistergirls are Indigenous people who were classified male at birth but live their lives as women, including taking on traditional cultural female practices. Brotherboys are Indigenous people who were classified as female at birth but who have a male spirit. ¹
<i>Child/children</i>	According to Article 1 on the United Nations <i>Convention on the Rights of the Child</i> , a child is defined as every human being under the age of 18. To incorporate older children respectfully, the term 'children and young people' is used throughout this report. 'Youth' is also used interchangeably with 'children and young people' to specifically refer to FIFA's existing programs in this area. 'Young people' also extends to cover young adults just over the age of 18 who are a group of special attention for FIFA because they have been identified by research to be at particular risk in football.
<i>Indigenous peoples or First Nations</i>	These terms are used to collectively describe the Indigenous peoples of both Australia and Aotearoa New Zealand, unless otherwise specified.
<i>Māori</i>	A (post-colonisation) term for Indigenous New Zealanders, developed to distinguish tangata whenua from new Pākehā colonisers. Prior to colonisation, iwi (tribe) and hapū (subtribe) identifiers were the predominant way of identifying different groups of people, whereas post-colonisation Māori became the term to identify all Indigenous New Zealanders in contrast to European arrivals. Iwi and/or hapū identification still plays a huge role in identifying whakapapa/lineage and connection. The NZHRC section of the report interchangeably uses tangata whenua [all lowercase] and Māori.
<i>Mana Whenua</i>	Territorial rights, power from the land, authority and jurisdiction over land or territory. The term speaks to the iwi or hapū's history and legends based in the land they have occupied over generations – their source of power, prestige, influence and authority (<i>mana</i>) is connected with the ancestral land and the caretaking/guardianship (<i>kaitiakitanga</i>) function the iwi holds.

A range of values integral to Te Ao Māori (the Māori world) are mentioned in the report. Along with mana, other values mentioned include *manaakitanga*, *kaitiakitanga*, *kotahitanga* and *tangata whenua*.

<i>Cultural Safety</i>	A culturally safe environment has been defined as one ‘where there is no assault, challenge or denial of [Aboriginal and Torres Strait Islander people’s] identity, of who they are and what they need’. ² In an employment or participation context, cultural safety has been conceived of as an ability to practise your culture free of ridicule or condemnation. It occurs when a workplace acknowledges, respects and accommodates difference. Unsafe cultural practice is any action which diminishes, demeans or disempowers the cultural identity and wellbeing of an individual.
<i>Disability</i>	Disability is a broad term including people with physical and psycho-social impairment. Disabled people include those who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others (see the United Nations Convention on the Rights of Persons with Disabilities, article 1).
<i>Disabled people</i>	While this report uses this term, which is preferred by the NZHRC and key stakeholders in Aotearoa New Zealand, it is noted that <i>people with disability</i> is the term commonly used in Australia.
<i>Fanfest</i>	Fanfests are public viewing events organised by FIFA and the host cities during FIFA World Cup tournaments. Fan Fests take place in iconic locations of the host cities and feature broadcasts of football matches on giant screens, live concerts, parties, food, beverages and other activities and entertainment.
<i>FIFA</i>	The Fédération Internationale de Football Association is the world governing body of football, ³ which convenes the FIFA Men’s and Women’s World Cups.
<i>Kaitiakitanga</i>	Guardianship and stewardship, including over the natural environment.
<i>Kotahitanga</i>	Unity/togetherness/solidarity.
<i>LGBTQI+/SOGIESC</i>	In Australia, the acronym LGBTQI+ is used by key stakeholders to refer to Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex people and communities and makes reference to issues of sexual orientation, gender identity and gender expression, and bodily diversity. While the term LGBTQI+ is used in this report, it is noted that the NZHRC uses the acronym SOGIESC (‘sexual orientation, gender identity and expression, and sex characteristics’).
<i>Local entities</i>	Local entities for the FWWC2023, FIFA has established two local operating entities in the host countries, in Australia and Aotearoa New Zealand respectively, which, in conjunction with FIFA and the host governments, are responsible for the planning, preparation and delivery of the FWWC2023.

<i>Manaakitanga</i>	Hospitality, kindness, generosity and mutual respect, emphasising responsibility and reciprocity.
<i>Mega Sporting Events (MSEs)</i>	Mega sporting events are defined as those one-time sporting events of an international scale organised by a special 'authority' and yielding extremely high levels of media coverage and impacts (economic, tourism, infrastructure, etc.) for the host community because of the event's significance and/or size. The mega event is often accompanied by parallel activities such as festivals and/or cultural events. ⁴
<i>Member Associations</i>	FIFA ⁵ has 211 affiliated associations worldwide, which it supports financially and logistically through various programmes. As representatives of FIFA in their countries, these member associations have obligations to respect the statutes, aims and ideals of football's governing body and promote and manage the sport of football accordingly.
<i>Professional Footballers Australia (PFA)</i>	Is the exclusive representative body and collective bargaining agent of Australia's elite professional footballers, including A-League, W-League, Socceroos and Matildas players.
<i>Reconciliation Action Plans (RAPs)</i>	Assist businesses to embed the principles and purpose of reconciliation. Based around the core pillars of 'relationships, respect and opportunities', RAPs provide tangible and substantive benefits for Aboriginal and Torres Strait Islander peoples, increasing economic equity and supporting First Nations' self-determination. Over 1,100 organisations in Australia have RAPs, which are formulated in collaborative partnership with Reconciliation Australia, ⁶ a non-profit organisation and the lead body for reconciliation in Australia. 'At its heart, reconciliation is about strengthening relationships between Aboriginal and Torres Strait Islander peoples and non-Indigenous peoples, for the benefit of all Australians'. ⁷
<i>Safeguarding</i>	As defined by Childwise, ⁸ safeguarding is the action that an organisation or group takes to promote the welfare of children who spend time, participate in, or are impacted by, their organisation or group – and protect them from harm. This is an obligation of all organisations or groups who interact with children and young people – whether directly or indirectly.
<i>Tangata Whenua</i>	The Indigenous people of Aotearoa. This literally translates to 'people of the land' and speaks to the Indigenous and ancestral connection to land and place.

Safeguarding actions include those that the organisation or group takes to:

- protect children from abuse and neglect
- prevent harm to children’s health and wellbeing
- ensure children have a voice in decisions that affect them⁹
- empower children to reach their full potential
- actively promote the inclusion and participation of children
- build a child safe culture and environment.

In this report, safeguarding concerns both children and other specific groups as identified by FIFA and set out in section 3.3(e) of this report, unless otherwise indicated.

Salient human rights risks

The United Nations Guiding Principles on Business and Human Rights (UNGPs)¹⁰ require business enterprises to identify their ‘severe human rights risks’ but acknowledge that they may need to prioritise which risks should be addressed first. The UN Guiding Principles Reporting Framework (UNGPs Reporting Framework) asks that they focus their reporting on their ‘salient human rights issues’, which will vary from one enterprise to another. Salient human rights risks are those human rights that are at risk of the most severe negative impacts through a company’s activities or business relationships.

United Nations Guiding Principles on Business and Human Rights (UNGPs)

The UNGPs are the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity, and they provide the internationally-accepted framework for enhancing standards and practices with regard to business and human rights.

The UNGPs were developed by the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises, the late Professor John Ruggie. The Human Rights Council unanimously endorsed the Guiding Principles in its resolution 17/4 of 16 June 2011.

UN Guiding Principles Reporting Framework

The UNGPs Reporting Framework is the world’s first comprehensive guidance for companies to report on how they respect human rights, building on the work of the UNGPs. It supports businesses enterprises in taking action to implement the UNGPs.



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1. Introduction

1.1 Purpose of the human rights risk assessment

In June 2020, there was cause for much celebration as Australia and Aotearoa New Zealand were announced as the joint host countries of the 2023 FIFA Women's World Cup¹¹ (FWWC2023/tournament), one of the world's biggest sporting events.

In July 2021, in line with its stated commitment to human rights, the Fédération Internationale de Football Association (FIFA) partnered with the national human rights institutions of the two host countries: the Australian Human Rights Commission (AHRC) and the New Zealand Human Rights Commission (NZHRC) to consider human rights concerns related to the FWWC2023.

The AHRC and NZHRC have been asked by FIFA to conduct an independent human rights risk assessment in preparation for the tournament (Human Rights Risk Assessment).

The objective of this Human Rights Risk Assessment is to:

- identify and prioritise, jointly with relevant stakeholders, human rights-related concerns to be addressed as part of FIFA's Sustainability Strategy for the tournament
- to provide the findings and make recommendations to FIFA accordingly.

This Human Rights Risk Assessment has identified the *salient human rights risks*, which the AHRC and NZHRC recommend that FIFA should take into consideration in preparation for the FWWC2023. Recommendations in relation to these risks are set out in section 4 of this report.

This Human Rights Risk Assessment builds on FIFA's considerable work over several years in seeking to promote respect for human rights and respond to the concerns of affected stakeholders and civil society. In May 2017, FIFA published a human rights policy,¹² in which FIFA committed to respect human rights in accordance with the United Nations Guiding Principles on Business and Human Rights¹³ (UNGPs).

FIFA's human rights policy acknowledges the potential adverse impacts FIFA tournaments can have on the human rights of people belonging to specific groups, such as indigenous peoples, women, national, ethnic, religious and linguistic minorities, children, disabled people, migrant workers and their families, human rights defenders, and people with a diverse sexual orientation, gender identity or expression, or sex characteristics (LGBTQI+).¹⁴ Furthermore, it identifies the following 'salient human rights risks' related to its operations: labour and employment rights, land acquisition and housing rights, discrimination, security, and players' rights.¹⁵

1.2 The changing risk landscape and COVID-19

This Human Rights Risk Assessment provides an overview of the current and reasonably foreseeable human rights context in relation to the tournament. Importantly, and in line with the concept of *human rights due diligence* drawn from the UNGPs, the risk landscape will need to be continually monitored and reviewed in the lead up to the tournament. Risks can evolve and change, and issues which were considered unlikely or less likely to occur may become more significant due to changes in the local or international context. Accordingly, FIFA and the tournament organisers will need to continue to actively consider whether there are any new or emerging human rights issues that should be taken into consideration, and whether existing risks have become more severe.

At the time that this Human Rights Risk Assessment was conducted, large parts of both Australia and Aotearoa New Zealand were subject to city and/or state-wide lockdown restrictions, as a result of the COVID-19 pandemic. Additionally, the international borders of both countries were closed to international travellers. By the time of the FWWC2023, it is likely that such significant restrictions on the freedom of movement both into and within the borders of both Australia and Aotearoa New Zealand, will no longer be in place. The use of 'vaccine passports' or certificates, face covering mandates or other measures, such as restriction of movement for local sites, may continue to be part of future public health responses. If so, the use of these measures should be consistent with human rights – including that they are reasonable, necessary, and proportionate. Additionally, any such measures must consider the potential for discrimination, provide for transparency in decision-making and include frequent review periods.

Depending on the severity of the COVID-19 pandemic in the future, there may be ongoing risks relating to increased pressures on health systems. This risk will need to be assessed in more depth, closer to the time of the tournament.

1.3 Mega sporting events and human rights

Mega Sporting events (MSEs) hold much promise for the host cities, countries and communities that deliver them. Expectations can range from job creation, income generation, urban renewal and the development of social infrastructure, to the promotion of healthy living and increased participation in sports. Sport can also play an important role in furthering the promotion and protection of human rights by fostering positive change.

Despite the powerful role that sport can play in driving such cultural change, MSEs also carry inherent human rights risks, which have come under increased scrutiny in recent years.¹⁶ Significant human rights challenges may arise across the entire MSE lifecycle and can include risks of exploitation of migrant labour involved in developing the infrastructure, forced evictions or clearing of homeless people from public spaces, child labour in the production of the merchandise, discrimination on the field – and more.¹⁷

Host countries of MSEs need to demonstrate that human rights have been considered at all stages of a tournament, from the bidding process, through to the planning, delivery, and legacy of the event to ensure risks to people are addressed. To do this effectively the international sporting body (e.g., FIFA), its local entities established in the host country and the host government/s should be involved. Additionally, there is a growing expectation that the UNGPs apply to international sporting organisations.¹⁸ The UNGPs are the authoritative global standard for states and businesses on preventing and addressing adverse business-related human rights risks and abuses. June 2021 marked 10 years since the UNGPs were unanimously endorsed by the UN Human Rights Council. They are now widely respected, promoted and used as the basis for corporate and government responses to human rights challenges arising in relation to business.

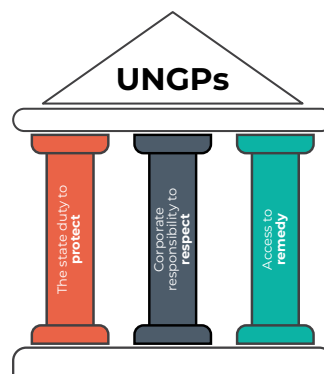


1.4 Methodology

A brief background to this assessment, explaining the UNGPs and an overview of the consultation process, is set out in Appendices 1 and 2.

(a) The UNGPs framework

This Human Rights Risk Assessment uses the framework outlined in the UNGPs,¹⁹ which unlike traditional forms of risk assessment, focuses on identifying the risks of harm to *people*, rather than risks of harm to *the business or organisation* in question.



The UNGPs comprise 31 principles within a three-pillar 'Protect, Respect and Remedy' framework:

- Pillar I:** the State duty to protect against human rights harms, including by business
- Pillar II:** the business responsibility to respect human rights
- Pillar III:** the need to ensure that there is access to remedy for business-related human rights harms

The UNGPs expect that businesses will respect all internationally recognised human rights, including, at a minimum, the core human rights instruments: the 'International Bill of Human Rights'²⁰ (the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights), and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.²¹ Depending on the circumstances, businesses may need to also consider additional United Nations (UN) standards to respect the human rights of individuals belonging to groups or populations requiring particular attention because they are at risk of adverse human rights impacts. The UNGPs expect that businesses do not simply comply with the domestic laws of the host nation but that where those laws do not reflect international human rights standards, then businesses should still seek ways to honour the principles of internationally recognised human rights.

In the context of this Human Rights Risk Assessment, instruments of particular relevance include:

- UN Convention on the Rights of the Child²²
- UN Convention on the Rights of Persons with Disabilities²³
- UN Convention on the Elimination of all Forms of Discrimination against Women²⁴
- UN Convention on the Elimination of All Forms of Racial Discrimination²⁵
- UN Declaration on the Rights of Indigenous Peoples²⁶
- UN Supplementary Convention on the Abolition of Slavery²⁷
- Children's Rights and Business Principles²⁸
- ILO Declaration on Fundamental Principles and Rights at Work²⁹
- ILO Forced Labour Convention (No.29)³⁰
- ILO Abolition of Forced Labour Convention (No.105)³¹
- ILO Violence and Harassment Convention (No.190)³²
- ILO Occupational Safety and Health Convention (No.155)³³
- Te Tiriti o Waitangi³⁴
- Yogyakarta Principles³⁵



In line with the UNGPs, the severity of the human rights risks and impacts arising in the context of the tournament has been assessed by reference to their *scale, scope and irremediable character*.³⁶

1. *Scale* is concerned with how grave or serious the impact is.
2. *Scope* is concerned with how widespread the impact is, or the numbers of people impacted.
3. *Remediability* means the ability to restore those affected to a situation at least the same as, or equivalent to, their situation before the impact.

(b) Salient human rights issues

According to the UNGPs Reporting Framework, a company's salient human rights issues are 'those human rights that stand out because they are at risk of the most severe negative impact through the company's activities or business relationships'.³⁷

*This concept of salience uses the lens of **risk to people**, not the business, as the starting point, while recognizing that where risks to people's human rights are greatest, there is strong convergence with risk to the business.*

The emphasis of salience lies on those impacts that are:

- **Most severe:** based on how grave and how widespread the impact would be and how hard it would be to put right the resulting harm.
- **Potential:** meaning those impacts that have some likelihood of occurring in the future, recognizing that these are often, though not limited to, those impacts that have occurred in the past;
- **Negative:** placing the focus on the avoidance of harm to human rights rather than unrelated initiatives to support or promote human rights;
- **Impacts on human rights:** placing the focus on risk to people, rather than on risk to the business.³⁸

The business responsibility to respect human rights outlined in the UNGPs, requires that businesses:³⁹

- avoid *causing or contributing* to adverse human rights impacts *through their own activities and address* such impacts when they occur.
- *seek to prevent or mitigate* adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

This means that FIFA and its local operating entities will need to take action to avoid causing or contributing to adverse impacts, or being directly linked to adverse impacts.

(c) Overview of the research and consultation process

This Human Rights Risk Assessment was conducted through a combination of the following:

- desktop review and research
- consultations with stakeholders in both Australia and Aotearoa New Zealand
- consultation with a small group of experts to test and validate these findings regarding the salient risks identified.

Broadly, this Human Rights Risk Assessment considered potential impacts on three broad groups of rights-holders:

- players, coaches and support staff/team entourages
- workers (including in supply chains) and volunteers
- spectators and local communities.

When consulting with these three groups, particular attention was given to persons and groups who may be at particular risk, such as children and young people, women, Indigenous communities, culturally and linguistically diverse communities, disabled people and persons identifying as LGBTQI+.

Potential adverse human rights impacts associated with media representation were also assessed by including journalists' perspectives in consultation across the three broad groups of rights-holders, and through targeted consultations.

The NZHRC was responsible for conducting stakeholder engagement and consultations in Aotearoa New Zealand and reviewing and providing input into the key findings to ensure thorough and accurate coverage of human rights issues concerning Aotearoa New Zealand's hosting of the FWWC2023.

As a result of restrictions in place due to COVID-19, consultations in both Australia and Aotearoa New Zealand proceeded through online meetings.

Further details of the stakeholder consultation process are set out in Appendix 1 of this report.

This Human Rights Risk Assessment has also been informed by:

- the preliminary work completed by Griffith University in their 'Independent Human Rights Context Assessment Australia & New Zealand' in December 2019 for the FWWC2023; and
- the risk assessment methodology developed for the FIFA 2022 Men's World Cup in Qatar, making changes where appropriate for the Australian and Aotearoa New Zealand contexts.

Similarly, this Human Rights Risk Assessment has taken into account the risks identified in FIFA's pilot *Guardians Safeguarding Risk Assessment Matrix*, but with changes and adaptations where appropriate for the Australian and Aotearoa New Zealand context.



(d) Overview of the legal and human rights protections in the host countries

Australia and Aotearoa New Zealand both have strong criminal, work health and safety, child protection, privacy and anti-discrimination laws and oversight bodies. In Australia, this includes federal and state anti-discrimination laws and Human Rights Acts in Queensland, Victoria and the Australian Capital Territory. It also includes federal and state bodies such as the AHRC, state and territory human rights agencies, the eSafety Commissioner, the Australian Information Commissioner, the Fair Work Ombudsman and the Australian Building and Construction Commission, as well as separate state regulatory bodies for work health and safety.

Aotearoa New Zealand's workplace, safety, child protection and anti-discrimination bodies include the NZHRC as well as the Waitangi Tribunal, the Office of the Children's Commissioner, the Office of the Privacy Commissioner, Netsafe, the Labour Inspectorate and WorkSafe NZ, and the Office of the Ombudsman.

In order to protect the human rights of people impacted by its activities in the planning and delivery of the FWWC2023, FIFA will need to ensure that it is aware of, and complies with, all existing legal obligations in both countries.



2. Snapshot of the FIFA 2023 Women's World Cup

The tournament will take place across Australia and Aotearoa New Zealand over a period of four weeks, from 20 July to 20 August in 2023.

There will be 32 teams participating in the tournament, an increase from the 24 teams in the 2019 FIFA Women's World Cup. In 2023, the teams will be competing across 64 matches (an increase from the 52 matches held in 2019) played in 10 stadiums, across nine host cities. There are five host cities in Australia and four host cities in Aotearoa New Zealand.

Australian host cities and stadiums

The Aboriginal and Torres Strait Islander traditional custodians of the country on which the tournament will take place are acknowledged and their continuing connection to place and land recognised.

- Adelaide – Hindmarsh Stadium
- Brisbane – Brisbane Stadium
- Melbourne – Melbourne Rectangular Stadium
- Perth – Perth Rectangular Stadium
- Sydney – Stadium Australia and Sydney Football Stadium

Aotearoa New Zealand host cities and stadiums

- Auckland / Tāmaki Makaurau – Eden Park
- Dunedin / Ōtepoti – Dunedin Stadium
- Hamilton / Kirikiriroa – Waikato Stadium
- Wellington / Te Whanganui-a-Tara – Wellington Stadium

The competitor teams at the FWWC2023 will be determined through a series of regional qualification tournaments which will take place throughout 2021–2022. The qualification tournaments are outside the scope of this risk assessment.⁴⁰

The tournament is expected to attract many thousands of international visitors to Australia and Aotearoa New Zealand and will include athletes, coaches, team entourages, international volunteers, spectators and fans from around the world.

In addition to the wider FIFA Volunteers Programme involving thousands of volunteers over the age of 18, international child volunteers are supported by FIFA's 'Marketing Rights Delivery Youth Programme'. An estimated total of 4,000 children (both national and international) will be selected by FIFA's Commercial Affiliates to participate in the programme as ball crew, coin toss kids, FIFA Flag carriers, FIFA Living Football flag carriers, national flag carriers, official match ball carriers and/or as player escorts.

It is expected that the FWWC2023 will be accompanied by a significant festival element, known as the FIFA Fanfest, as well as special fan zones established for fan groups in designated suburban hubs within host cities.



3. Human rights risks and challenges

3.1 Overview of salient human rights risks

The UNGPs Reporting Framework⁴¹ asks business enterprises to focus their reporting on their 'salient human rights issues', which will vary from one enterprise to another. Salient human rights risks are those human rights that are at risk of the most severe negative impacts through a company's activities or business relationships.

This Human Rights Risk Assessment has identified a total of 57 risks, 25 of which are rated as tier 1 risks, based on the severity (considering scale, scope and remediability) and the likelihood of them arising. Risks are classified into three tiers:

- Tier 1 risks must urgently be addressed as most salient.
- Tier 2 risks must be addressed as next most salient.
- Tier 3 risks should be addressed to prevent harm occurring.

Addressing these salient risks should be FIFA's priority as it develops its Sustainability Strategy for the tournament. The saliency risk matrix is below at section 3.4.

Overarching challenges

The FWWC2023 is a multi-jurisdictional event. It will take place not only across two nations, but also within the federal structure of Australia. There are different laws and competent authorities within each state, territory and at the federal level, across each operational area – including law enforcement, safeguarding and anti-discrimination. Accordingly, there will need to be extensive coordination and strong governance processes to address this complexity.

The relatively short timeframe for planning and delivery of the FWWC2023 may pose risks with respect to ensuring there is proper and timely engagement with stakeholders. Particular attention will need to be given to properly engaging with Indigenous peoples and traditionally underrepresented and marginalised groups in advance of 2023. As identified in the discussion of risks to Indigenous peoples below, early and genuine partnership with the Indigenous peoples of both host nations will be crucial to mitigating risks and capitalising on opportunities for both FIFA and Indigenous peoples in both host countries.

The following sections of this report set out risks across the planning, competition and legacy stages of the tournament lifecycle, analysing distinct groups of rights-holders as well as cross-cutting human rights issues.

3.2 Rights-holders

(a) Risks for workers (including in supply chains)

Strong labour and work health and safety laws are in place in both countries. In 2018, the Australian government introduced the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act), which requires that certain entities, including businesses with an annual turnover of AUD\$100 million or more, publish annual reports outlining the risks of modern slavery in their operations and supply chains, and the actions they are taking to address those risks. FIFA may have reporting obligations under the Australian Modern Slavery Act through its local operating entity.

Aotearoa New Zealand has not yet introduced equivalent legislation which places a positive/reporting obligation on businesses, although the NZHRC has advocated for legislation of this kind for some time. In 2019, in Aotearoa New Zealand's Third Universal Periodic Review Cycle, it was recommended that New Zealand consider introducing legislation requiring businesses to report publicly on transparency in supply chains, to eliminate practices of modern slavery. The New Zealand Government accepted this recommendation and has committed to a plan of action against forced labour, people trafficking and slavery.⁴²

Against this backdrop, the risks of labour exploitation in FIFA and its local entities' supply chains and working conditions in its operations are recognised as key issues to be addressed. 'Modern slavery' is an umbrella term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, kafala system sponsorship (particularly in the Gulf states), forced marriage, and the worst forms of child labour.⁴³

It can also include forceful confiscation of workers' passports or threats to revoke visa sponsorship. Importantly, the definition of modern slavery in the Australian Modern Slavery Act does not include the underpayment of wages or other poor working conditions, which are nonetheless relevant to FIFA's responsibilities under the UNGPs.

One of the key risks for FIFA and its local entities in this regard is the sub-standard treatment of workers within their supply chains. This is particularly the case where there is a lack of visibility of the employment arrangements and practices of suppliers and sub-contracted entities operating at tournament locations or providing support services, where such practices may be in contravention of labour laws.

Migrant workers—Pre-COVID-19, temporary migrant workers made up approximately 11% of the workforce in both Australia⁴⁴ and Aotearoa New Zealand. Research indicates that such workers are less likely to assert their rights for many reasons. They include: a lack of awareness of their rights and available remedies; cultural and language barriers; and fear of reprisals, such as being reported to the immigration authorities and risking penalties or cancellation of visa rights.⁴⁵ Migrant workers are more at risk of exploitation through practices such as excessively long working hours, being underpaid or not paid, having their minimum employment rights ignored, and being subjected to threats or harm.⁴⁶ If migrant workers are working without valid visas and receive a work-related injury, they may not seek health care for fear of deportation or other legal consequences.

In addition, risks of human trafficking and forced labour or domestic servitude may arise in the context of international arrivals bringing domestic labourers with them under conditions that breach human rights standards. Exploitation can occur before an overseas worker has left their home country, for example in contexts where an employer asks the worker to pay excessive fees to facilitate immigration and visas.

Once the worker arrives in the country of employment, workers are forced to pay off their significant debt to the employer often in exploitative conditions. Aotearoa New Zealand has introduced the Migrant Exploitation Protection Visa, which is intended to ensure migrants can quickly leave exploitative situations and lawfully remain in Aotearoa New Zealand.⁴⁷

Young workers—young workers (those aged under 30 years) also remain at higher risk of exploitation and abuse. They are often unaware of their rights or how to access them. This can result in underpayment of wages, non-payment of entitlements such as penalty rates, over-time or superannuation and increased risk of sexual harassment.

The AHRC's 2018 National Survey on Workplace Sexual Harassment found that people aged 18-29 experienced the highest rates of workplace sexual harassment at 45%, compared to the average prevalence rate of 33% (across all age groups). Women aged 18-29 years experienced higher rates of workplace sexual harassment at 53%.⁴⁸ The cleaning, hospitality and hotel sectors in Australia and Aotearoa New Zealand are highly feminised and dominated by young people.

Certain industries and groups of workers were identified as high-risk through desk-top research. This assessment was validated through stakeholder consultations with academics and representatives of affected groups in both Aotearoa New Zealand and Australia.

These industries and groups of workers include:

Construction—key risks identified relating to the rights of workers in the construction industry include: work health and safety risks, underpayment, exploitation of migrant workers, sexual harassment and potential restrictions on freedom of association and the right to collective bargaining.⁴⁹



No new stadiums are being constructed for the purpose of the FWWC2023, which reduces the scope of this risk. However, there are uplift and refurbishment requirements for all of the existing stadiums, and for one new stadium under construction already in Sydney.

Hospitality—key risks to workers identified in the hospitality industry arise in connection with a range of systemic issues in the industry including: underpayment of wages, failure to comply with mandated paid breaks or working hours, insecure work, sexual harassment and bullying. Workers in the hospitality industry may be vulnerable due to their status as migrant workers, international students, backpackers, children and young people, and may be particularly impacted by the abovementioned issues.⁵⁰

Stakeholders from hospitality unions/NGOs also identified particular risks to workers relating to excessive alcohol consumption by patrons, including escalation of sexual harassment and abuse, and workers over-serving alcohol due to lack of employment support and training.

Cleaning—the cleaning industry is recognised as a high-risk industry for labour exploitation. International students, backpackers and migrant workers and other vulnerable workers make up a significant cohort of the workers within this industry. The following risks have been documented in the cleaning industry: withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions. Sexual harassment of young female and LGBTQI+ workers also occurs and is often underreported. Sub-contracting of labour is very common in the cleaning industry, which tends to elevate risks of labour exploitation.

Hotels—the Australian Fair Work Ombudsman has conducted several compliance activities in recent years which have highlighted the risks to vulnerable workers in the hotel (and cleaning) industries, including international students, backpackers and migrant workers and among housekeeping staff in particular.

Key labour rights risks in the industry include underpayment of wages, lack of recognition of the employment relationship and retaliation against workers for speaking out about substandard working conditions.⁵¹ Lone workers, particularly those in night shifts, may also be at increased risk of threats, and verbal and physical violence.⁵²

Security—investigations by the Australian Fair Work Ombudsman⁵³ have highlighted underpayment of wages in the security industry. They have also highlighted the culturally and linguistically diverse nature of the workforce, lack of awareness of workplace laws and entitlements and the high incidence of workers being inappropriately treated as contractors as opposed to employees, and therefore being underpaid. Those working in hospitality-related security (e.g. bouncers at bars and nightclubs) also face risks relating to alcohol-related harm including physical violence.

Consumer goods—the risks of labour exploitation, including modern slavery, such as extreme forms of child labour, debt bondage and forced labour in supply chains of low-cost and fast-moving consumer goods are well-documented.⁵⁴ These issues have gained increased public attention in Australia with the introduction of the Modern Slavery Act. FIFA has a long history of receiving scrutiny over such issues with respect to footballs and merchandise produced by its sponsors.

(b) Risks of labour exploitation for volunteers

A key issue highlighted by stakeholders in relation to volunteers was the need to distinguish between paid and unpaid work. In the context of the tournament volunteers may be asked to perform roles which are similar to paid roles without proper remuneration, or to perform work in the same manner as an employee. Situations where volunteers are asked to do so may be exploitative and unlawful.

Other risks identified for the volunteer cohort are identified below in section 3.3 Cross-cutting risks.



(c) Risks pertaining to sponsors and broadcasters

Under the UNGPs and FIFA's own human rights policy, FIFA's responsibility to consider human rights risks extends to a consideration of the actions of its commercial affiliates. For MSEs like the FWWC2023, this includes media broadcast partners and commercial sponsors. Specific risks pertaining to sponsors might include freedom of expression and association of athletes and issues of equality and non-discrimination.

With respect to broadcasters, the right of athletes and journalists to be free from discrimination and harassment, including sexual harassment is a key issue, as well as gender equality and the appropriate representation of women from diverse backgrounds, such as First Nations and women of colour, in the presentation of media coverage for the FWWC2023.

Stakeholders in Australia have identified risks of specific instances of sexual harassment and racial discrimination of athletes, and the treatment of women and LGBTQI+ people on social media in relation to recent global MSEs. Stakeholders in the Aotearoa New Zealand roundtable focusing on LGBTQI+ communities raised the significant amount of media attention (and corresponding abuse) directed at a trans athlete during her competition in the Tokyo 2020 Olympics. Other stakeholders referred to the online racial abuse directed at members of the English national football team following the Union of European Football Associations (UEFA) Euro Cup 2021 final.

The large number of children participating as volunteers in the FIFA Commercial Affiliates' Marketing Rights Delivery Youth Programme also poses risks with respect to ensuring child safety, privacy and wellbeing. Stakeholders highlighted the need to ensure that all those working with children have adequate criminal history and/or Working with Children Checks completed. Additionally, consent must be obtained for the use of images containing children throughout the tournament.

(d) Risks for players, coaches and support crew

The AHRC received a detailed submission from Professional Footballers Australia (PFA), the players' association, on behalf of the Matildas players, Australia's national football team, concerning the 736 players who will take part in the FWWC2023. This submission has been provided directly to FIFA with the permission of the PFA.

The PFA raised the importance of athletes being recognised as workers with the attendant rights to freedom of association and collective bargaining and all the other rights that flow from being recognised as workers. The PFA also raised the gender inequity that exists between the FIFA Men's and Women's World Cups, notably with respect to the prize money afforded to each tournament historically, with the Women's World Cup offering being just 7.5% of the Men's World Cup.

The PFA also raised a number of issues concerning what they referred to as the 'supply chain of players', which while having a connection to the tournament, were beyond the scope of this Human Rights Risk Assessment.

The PFA argued:

As far as the players are concerned, a human rights impact assessment cannot merely focus on the 736 or the one month. It must also address that supply chain, both historically and to ensure that the legacy of the [FWWC2023] is one that converts the learnings of the impact assessment into a system of work in women's football which does not merely respect the human rights of the players, but genuinely positions football as the sport of choice for girls and women the world over.

Opportunities to address these important issues for the human rights of players have been included in section 5 of this report, concerning the human rights legacy opportunities of the FWWC2023.

In their submission, the PFA identified human rights risks and impacts on players at two levels: direct and systemic:

There are a number of direct human rights risks to and impacts on players:

- *discrimination on the basis of gender, sexual preference and race;*
- *harassment and abuse, including when children;*
- *denial of the right to freedom of association, organise and collectively bargain, including retribution. This exacerbates the economic and labour discrimination and exploitation that players face including grossly unequal pay for work of equal value and the denial of decent work, including a living wage;*
- *threats to the health, safety and wellbeing of players, such as severe and career ending injury due to unsafe workplaces often not tailored to suit women and girls;*
- *threats to mental health, including psychological distress, addiction and depression;*
- *denial of an education which can impact players both during their careers and especially when they are seeking to transition into post-playing careers;*
- *unjustified restrictions of freedom of expression; and*

- *the denial of basic legal rights, including through invasive sports integrity measures, the denial of the presumption of innocence and lack of access to an effective remedy. Indeed, players have been threatened with suspension when seeking to enforce their legal rights in human rights jurisdictions such as by challenging competition regulations, conditions and standards because they discriminate on the basis of gender; and*

*there are a number of **systemic human rights risks to and impacts on players:***

- *the failure by States to uphold their duty to protect the human rights of players due to treating sport as an exceptional activity warranting specific laws;*

- *despite articles 3 and 4 of the FIFA Statutes and the landmark FIFA Human Rights Policy of May 2017, the absence of clearly defined or applicable human rights commitments and obligations on the major actors in women's football;*
- *the absence of an effective process of player rights due diligence; and*
- *lack of access to effective remedy.*

In recent months, significant attention has been given to the poor handling of the welfare and mental health of elite athletes, particularly in light of the Tokyo 2020 Summer Olympics. Some athletes, including Laurel Hubbard, Naomi Osaka, and Simone Biles, have made statements on record regarding the stresses and pressures faced by elite athletes, and in particular the lack of support for mental health and athlete welfare.



Focus on the athlete experience, and the rights of athletes, has recently been elevated in Australia and Aotearoa New Zealand. Of note for this Human Rights Risk Assessment, are the Independent Review of Gymnastics in Australia conducted by the AHRC⁵⁵ and the Independent Review of Gymnastics in New Zealand⁵⁶ (both published in 2021). The reviews were established following serious allegations of abuse of children, particularly young girls, within the sport. More athletes from a wide variety of sports are coming forward to expose misconduct and abuse experienced during their careers. In October 2021, former Matilda, Lisa De Vanna, spoke out about abuse she had witnessed while playing and the recent death of New Zealand Olympian cyclist Olivia Podmore has also led to a second inquiry into Cycling NZ.

Stakeholders also raised the following risks pertaining to the rights of LGBTQI+ athletes, noting some overlap between these issues and the risks to spectators who identify as LGBTQI+ set out at section 3.2(e)(ii) of this report:

- The risk of transgender players facing discrimination under FIFA rules and being unable to participate in the tournament.
 - Stakeholders questioned FIFA’s position regarding the inclusion of trans players at all stages of their transition.
 - FIFA’s Gender Verification Regulations,⁵⁷ issued in May 2011, appear to be still in place despite advice from FIFA that these would be removed in 2019.
 - FIFA’s Gender Verification Regulations mandate that national associations can issue a request for a gender test to be performed on a female footballer, and this may include a review of medical history and a physical examination performed by an independent expert. It is unclear whether FIFA’s policies, including the Gender Verification Regulations, are trans-inclusive or exclusive. This policy position needs to be urgently clarified and updated.



- Restrictions on the freedom of expression of athletes with respect to sexual orientation, gender identity and expression, and sex characteristics, including through the display of the rainbow flag or other relevant signs and symbols at stadiums, Fanfests and related tournament sites.
- The risk of conflict between athletes or spectator groups seeking to voice beliefs that represent negative or harmful views concerning LGBTQI+ people.
- A lack of all-gender bathrooms for accessibility. In Aotearoa New Zealand, some player facilities (which were originally designed for men's teams) are in the process of being retrofitted to provide gender-neutral facilities.

(e) Risks for spectators and the broader community

(i) Ethnic and faith-based minorities – risk of discrimination and exclusion

Spectator racism is an unfortunate feature of the Australian, Aotearoa New Zealand and international sporting landscape, affecting both players and spectators as well as the broader community. It is unclear to what extent this issue will present itself during the FWWC2023. Past experience shows that the women's games tend to be more family-friendly, which may result in reduced spectator racism. Given the prominence of this human rights issue across Australasian sports, however, it remains an important issue for FIFA and the local operating entities to address comprehensively.⁵⁸

In 2020, the AHRC was commissioned to undertake an independent review of racial equality in the sport of basketball and reported on this in the Racial Equality Review of Basketball Australia.⁵⁹ Areas under investigation included exploration of the current structural barriers to achieving racial equality within Basketball Australia, as well as examination of the experiences of players, their families, coaches and staff. In this engagement, the AHRC heard about experiences of everyday racism and recommended actions to support a more inclusive culture in the sport.

In 2019, Sport New Zealand released a report on building cultural inclusion in active recreation and sport, specifically among Muslim girls and women.⁶⁰ The report confirmed that 'spaces and activities that consider or accommodate Muslim women and girls also create a safe and engaging space for a much more diverse range of people'. Increasing the visibility of Muslim and other faith-based and ethnic minority players can help support young sports people to see opportunities for their own future.

Stakeholders also highlighted the risks of a lack of cultural safety and intersectional racism against visible minorities, such as Muslim women and girls and young men of colour that may arise in stadia or Fanfest environments.

(ii) LGBTQI+ communities – risks of discrimination and exclusion

Stakeholders noted the following issues as key risks to be addressed by FIFA:

- The risk of transgender players facing discrimination under FIFA rules and being unable to participate in the tournament as set out in section 3.2(d) of this report.
- Restrictions on the freedom of expression of spectators with respect to sexual orientation, gender identity and expression, and sex characteristics, including through the display of the rainbow flag or other relevant signs and symbols at stadiums, Fanfests and related tournament sites.
- The risk of conflict between spectator groups or athletes seeking to voice beliefs that represent negative or harmful views concerning LGBTQI+ people.
- A lack of all-gender bathrooms for accessibility. Stakeholders identified all-gender facilities for stadium audiences as a need.

- Tournament security protocols creating risks to privacy and safety. Transgender people can be visibly different in their presentation from non-transgender people. Security culture can involve viewing difference as suspicious or dangerous. Privacy and security are at odds for many transgender people (as is also the case for some people with hidden disabilities).
- Heightened risks in cases of intersectionality of identities and issues, for example disabled trans people, or LGBTQI+ people of colour, Brotherboys and Sistergirls. These issues of accessibility and racism have been discussed more fully in other areas of the document.

(iii) Violence and alcohol-related risks

Multiple stakeholders noted that alcohol consumption is linked with a range of risks and harms, including physical violence. As previously noted, stakeholders in the hospitality space identified a particular set of risks relating to excessive alcohol consumption, including escalation of sexual harassment and abuse, and workers overserving due to a lack of employment support and training.

Alcohol is well-recognised as a contributing factor in the prevalence and severity of domestic or family violence, with one Aotearoa New Zealand study finding that one in three reported cases of domestic violence are alcohol affected.⁶¹ Sporting events (and home team losses) have been anecdotally linked to increased incidents of domestic violence. However, research indicates it is alcohol consumption (including but not only at sporting matches), which is a major contributor at all events where there is high alcohol consumption to an increase in all forms of violence.⁶² Advocates against family and domestic violence have recommended the creation of safe spaces, women-only spaces and/or alcohol-free districts at sporting venues.⁶³

The New Zealand Health Promotion Agency has carried out a study on the culture of alcohol promotion and consumption at major sporting events in Aotearoa New Zealand.⁶⁴ The study results 'highlight[ed] the perception that there is an entrenched, naturalised culture of alcohol promotion and consumption at some sports events in Aotearoa New Zealand',⁶⁵ but also noted events which deliberately promoted a 'family experience'.⁶⁶ These included designated low-alcohol and alcohol-free seating areas, no alcohol brands as naming sponsors, and public health 'Ease up on the Drink' messaging visible across the event.

(iv) Disruptions to the local community

Drawing on stakeholder feedback and the lessons from the 2018 Gold Coast Commonwealth Games, there are a range of potential adverse human rights impacts on the local community. These might include disruptions to public transport and local roads that particularly affect vulnerable people, such as delivery of meal services to the elderly or support services to disabled people, as well as increases in the cost of living (the cost of housing in particular) potentially pricing people out of their local communities. Stakeholders also highlighted the importance of transparency, accountability and good governance around infrastructure planning and delivery which has longer term implications for local communities.

3.3 Cross-cutting

(a) Australia's First Nations peoples

One of the most significant human rights issues for FIFA and the local operating entities during tournament preparation and delivery, will be the recognition of and meaningful engagement with Australia's First Nations, Aboriginal and Torres Strait Islander peoples. Connections to lands and cultures have special significance for First Nations and the AHRC's report *Wiyi Yani U Thangani (Women's Voices): Securing Our Rights, Securing Our Future Report*,⁶⁷ underscores the importance of self-determination for Aboriginal women and girls and strengths-based community-driven approaches to addressing disadvantage.

Aboriginal and Torres Strait Islander peoples make up 3.3% of the Australian population and experience extreme disadvantage due to intergenerational inequality and discrimination. Australia's original inhabitants, with continuing cultures and presence for over 60,000 years, were dispossessed of their lands with the arrival of European settlement and occupation in 1788 and the declaration of Australia as 'terra nullius', until this was overturned in the High Court in the *Mabo* decision in 1992. Aboriginal and Torres Strait Islander peoples were also dispossessed of their families and cultures, through the official government policies of forced removals from 1910 to 1971, resulting in the Stolen Generation. Historical injustices have resulted in significant and ongoing inequities – including gaps in life expectancy, health, literacy, employment and education outcomes, over-incarceration, including the incarceration of children and young people, and higher rates of violence experienced by Indigenous women and girls.

Stakeholder feedback reflected the importance of comprehensive engagement with First Nations people. This includes engagement through ceremonial, arts, employment, procurement and legacy aspects of the tournament. It also includes supporting existing initiatives that are supported by Aboriginal and Torres Strait Islander peoples themselves or working in genuine collaboration and co-design processes to drive new initiatives. Reconciliation Action Plans are one significant way to articulate and enact this commitment.

Working in genuine partnership with Aboriginal and Torres Strait Islander peoples will significantly reduce risks and expand opportunities, including for enduring benefits beyond the tournament. Importantly, the following key principles from the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)⁶⁸ must be central to any engagement or initiatives concerning First Nations:

- self-determination
- participation in decision-making
- respect for and protection of culture
- equality and non-discrimination.



(b) Aotearoa New Zealand's tangata whenua

Building meaningful engagement and partnership with tangata whenua (the Indigenous people of Aotearoa New Zealand) who make up 16.5% of Aotearoa New Zealand's population, will be a key to the enduring success of the tournament. As is the case for Aboriginal and Torres Strait Islanders, tangata whenua experience structural and systemic disadvantage due to colonisation, including the confiscation and alienation by the Crown of the vast majority of Māori land.

The relationship FIFA establishes and builds with tangata whenua will provide the essential platform for addressing both the risks and significant opportunities associated with the tournament.

Te Tiriti o Waitangi,⁶⁹ Aotearoa New Zealand's foundational document, establishes the relationship between Māori and the Crown. It affirms the status of whānau, hapū and iwi as tangata whenua, and recognises their pre-existing rangatiratanga (sovereignty and self-determination). It envisages a sharing of power and authority and a partnership of equals. Te Tiriti requires government to work in partnership, and share decision-making, with its Tiriti partners, and to respect and support the rangatiratanga authority of tangata whenua. Te Tiriti o and its principles (Partnership, Participation, and Protection) therefore creates the foundation and framework for engagement with Māori. The risks, opportunities and recommendations in, and arising out of, this section of the report are grounded in Te Tiriti and its principles (self-determination, participation in decision-making, respect for and protection of culture, equality and non-discrimination).

Stakeholder feedback reflected the importance of an opportunity focused approach. Opportunities for FIFA are discussed in section 5 of this report. The two key themes were:

- the importance of focusing on the opportunities as well as the risks, and
- building genuine relationships early and over time.

The starting point for the tournament must involve the creation of a relationship with mana whenua. Mana whenua are the tangata whenua that hold mana, i.e. have an ancestral connection/status with the stolen land on which the tournament will be held. Stakeholders in NZHRC's mana whenua and tangata whenua-focused hui (community gathering) emphasised that once this relationship has been established, both parties can begin to work through what is wanted and what can be gained from the tournament in a mutually respectful way. Through FIFA's relationships with mana whenua and other tangata whenua, more risks will come to light specifically around the opportunities both parties jointly decide to pursue.

Risks

Stakeholders warned against tokenistic engagement, for example using Māori culture and visual art with no action, systemic backing, or relationship behind it, or inadequate consultation. Te Tiriti affirms the position of tangata whenua as partners, rather than advisors or stakeholders to be merely informed of decisions. This extends to Māori being *involved* at the decision-making level in all parts of the event, not just ceremonial and visual aspects.

A common mistake stakeholders identified is establishing a primary partnership relationship with local councils and engaging with their Māori teams who could be from anywhere around the country. This is not a substitute for creating a relationship with Mana whenua of the area.

Failure to uphold and protect Indigenous knowledge and cultural integrity is a significant risk that has played out in many previous sporting events, which has involved dishonouring Indigenous tohu/symbols and toi/art. These risks can be mitigated by ensuring that tangata whenua are involved as decision makers, and have the final say about how their cultural property is managed.

Stakeholders expressed fear that the money and financial benefit generated from a tournament held on Māori land would flow overseas and tangata whenua would be left further disadvantaged. Stakeholders suggested for example that a mutually beneficial solution would see a portion of the funds raised being invested into the development of Māori football.

Bringing tangata whenua in too late into the process is a significant risk that stakeholders often see. If major decisions are made before tangata whenua are brought into the process, the likelihood of the above-mentioned risks occurring increases tremendously.

(c) Accessibility risks

Accessibility for all, including disabled people or people with limited mobility is a key risk. This includes the accessibility of infrastructure and services at the tournament-related stadiums and other sites, as well as transport, tourism infrastructure and the public buildings and other spaces in the host country. The following risks were raised by stakeholders:

- Lack of accessible communications about the tournament, including easy read materials, signing and captioning.
- Inequitable access to ticketing, particularly where this is managed by third-party providers, lack of access to pre-sale or specially priced ticketing (noting that disabled people are likely to have lower incomes and therefore do not have equitable access to premium tickets).
- Inequitable allocation of accessible seating within stadiums. Inequality and lack of choice, including sub-optimal seating allocations that impact line of sight.
- No appropriate access to venues and seating including for the 'last mile' and lack of suitable facilities such as bathrooms and catering.
- Lack of options for attendance by people with auditory sensitivities.

- Lack of access to volunteering opportunities (that include cost recovery for participation costs such as travel, accommodation, meals etc) and paid employment opportunities.
- Lack of engagement with people and organisations with lived experience of disability in the planning process.
- Inaccessible access to mechanisms for raising grievances or complaints.
- Inadequate accessible transport from home to stadium or Fanfest zones.

(d) Risks for children and young adults

Children and young people are particularly vulnerable to having their human rights compromised.

Extensive research and work at the state and national levels in Australia in recent years, including the Royal Commission into Institutional Responses to Child Sexual Abuse⁷⁰ (Royal Commission), has shone a spotlight on the vulnerabilities of children in institutional settings, including sports, to serious human rights violations. This is particularly the case where there is a power imbalance between adults and children, or children are isolated from others and with an adult alone or there is inadequate adult supervision.

Much work has been undertaken in response to the findings of the Royal Commission, and more still remains to be done. The following initiatives are of particular importance:

- the development by the AHRC of the National Principles for Child Safe Organisations⁷¹ (National Principles) and the suite of tools and resources developed to support the principles⁷²
- the work of Sport Integrity Australia with respect to child safeguarding⁷³
- the 'Keeping our Kids Safe' resources⁷⁴ developed to provide a cultural safety lens for Aboriginal and Torres Strait Islander Children in addition to the National Principles



- Sport New Zealand resources and online training in relation to safeguarding children
- the development of a child-friendly guide to accompany the Australian Government’s National Strategy to Prevent and Respond to Child Sexual Abuse (2021-2030).

In Aotearoa New Zealand, ‘core children’s workers’ of government funded entities are required by the *Children’s Act 2014 (New Zealand)* to undergo police checks before engaging in work with children, however sports volunteers are not (although it is recommended). Some sports organisations may require criminal history checks for volunteers, but many do not, with barriers including cost and privacy concerns.⁷⁵

Sport New Zealand has now released guidelines⁷⁶ that recommend the best practice is to engage a police check for any person who has regular contact with children or young people, whether a coach, manager, supervisor or volunteer, someone who drives children to activities or events, and anyone responsible for overnight trips away. However, these guidelines and recommendations are not enforceable by law.⁷⁷ In Australia, laws that require Working with Children Checks are regulated by states and territories and vary accordingly. Stakeholders commented on challenges arising in relation to complexities and the lack of regulatory harmonisation in this area.

According to the PFA submission, since 1991, 86 players under the age of 18 have participated in a FIFA Women’s World Cup. Additionally, it is expected that children will participate in the tournament as:

- spectators
- members of workers’ families both prior to and during the competition, as participants in Fanfests and

- in the 'Marketing Rights Delivery Youth Programme' with an estimated total of almost 4,000 children (both national and international) to be selected by FIFA Commercial Affiliates to participate in this programme as:
 - Ball crew
 - Coin toss kids
 - FIFA Flag carriers
 - FIFA living Football Flag carriers
 - National Flag carriers
 - Official match ball carriers
 - Player escorts
- volunteers (noting that FIFA will be engaging volunteers aged 18 years and older, however young adults who are just over the age of 18 may still be vulnerable).

Active risk mitigation will need to be undertaken in relation to each of the areas where children will be participating, including with respect to the risks of injury to children and young people.

(e) Safeguarding, grievance mechanisms, risks to the right to remedy

Safeguarding as a cross-cutting issue

The AHRC and NZHRC were asked by FIFA to consider the issue of safeguarding of persons who might be at risk of harm, including:

- children (all those under the age of 18)
- vulnerable adults, including youth just over the age of 18, women and other adults at risk.

Consideration of the particular risks to these groups aligns with the human rights-based approach taken by both the AHRC and the NZHRC. Accordingly, the analysis of the risks with respect to these groups has been woven throughout this report as a cross-cutting issue.

Grievance mechanisms and remedy

Following the 2019 Sport Integrity Review Report, Sport New Zealand launched new initiatives and integrity review measures in 2020 including an independent complaints management and mediation service.⁷⁸ The Sport and Recreation Complaints and Mediation Service is an independent complaints mediation service for everyone involved in sport and recreation, including children and young people, from community level to elite and high-performance sport.⁷⁹

However, the Sport and Recreation Complaints and Mediation Service is a relatively new service with an initial focus on mediation. Mediation is not always adequate or appropriate for harm-related issues in the sporting context and these issues may also be too low-level for police intervention – creating a gap in remedy.

The Sport and Recreation Complaints and Mediation Service more recently announced the capacity to recommend and carry out investigations, but still lacks monitoring and enforcement powers and does not create any protection for athletes against retaliation for reporting. There is therefore a need for further work to ensure enforceable and monitored outcomes where harm is alleged.

In the Australian context there are a number of grievance mechanisms that exist, under both state and federal laws and established regulatory bodies. These include state and federal law enforcement agencies, anti-discrimination and human rights bodies, work health and safety authorities and child protection agencies, as well as civil law remedies through the Courts, that may provide jurisdiction for complaints or investigations to be initiated arising out of matters connected to the FWWC2023.

In the sporting context, following the Review of Australia's Sports Integrity (the Wood Review) in 2018, Sport Integrity Australia was established in July 2020⁸⁰ with an independent Complaints Service for National Sporting Organisations that have signed up to the National Integrity Framework.⁸¹ Additionally, the National Sports Tribunal has jurisdiction for resolving certain disputes for eligible individuals and sporting bodies. With respect to the FWWC2023, it is likely that only a limited number of people may be eligible to access these mechanisms. Some stakeholders expressed reservations about the appropriateness of sports integrity bodies also being responsible for the resolution of matters relating to discrimination, harassment and abuse of players, due to a lack of human rights expertise.

Of particular note, stakeholders in these consultations expressed concerns that vulnerable people may not have consistent access to trusted, accessible and transparent grievance mechanisms, or access to a comprehensive overarching mechanism that can deal with all complaints, that has the following characteristics:

- accommodate their identities, for example cultural or ethnic identity, and the ways in which they have been made vulnerable
- provide trained staff who are competent to respond to complaints in a way that centres the targeted person and their experience and is culturally safe and trauma informed
- can facilitate access to effective solutions in a timely manner, and
- keep them informed about how their complaints will be addressed.

(f) Other human rights issues to be considered

(i) Risks to freedom of expression and association: security forces and special event legislation

It is likely that special event legislation may be introduced by national/state governments of the host countries for the duration of the tournament with respect to the tournament sites.

It is important that such legislation takes into account rights to freedom of expression and association, the right to protest and the ability of journalists to perform their jobs by gaining access to tournament sites. There is a possible risk to human rights defenders who may seek to exercise their rights to freedom of expression during this time, where security forces are not adequately trained to respect human rights. In general, this is not expected to be a significant risk, but should be taken into consideration in the planning of the tournament.

(ii) Refugees and asylum seekers – risks to asylum and non-refoulement rights

Based on past experiences of MSEs held in Australia, such as the Sydney 2000 Olympics and the 2018 Commonwealth Games, it is possible that some international arrivals, including athletes or members of their team entourages, may seek asylum. Risks in this regard include *refoulement* – in the event that the individual is unable to lodge a claim for or to access protection or to obtain legal support in order to do so. This will require further assessment once team selections and country qualifications have been carried out.

(iii) Technology, artificial intelligence and risks for rights to privacy and non-discrimination

The AHRC recently concluded a three-year project on Human Rights and Technology,⁸² which identifies both the risks and opportunities that technology, and emerging technologies, present for human rights. NZHRC has carried out a similar piece of research.⁸³ Drawing on that work, and the extensive stakeholder engagement conducted, FIFA should consider the human rights implications, such as the rights to privacy and non-discrimination, of any technology that is created or used to facilitate the operations of the tournament. This will include the use of artificial intelligence by security, ticketing apps and websites, COVID-19 protocols, or apps that are developed as communication tools, complaint mechanisms and/or information portals.



In particular, FIFA should consider the data privacy issues and risks associated with the collection, storage and use of personal information collected about individuals. Australia and Aotearoa New Zealand both have specific legislation in place to address these issues, which FIFA will need to adhere to.⁸⁴

(iv) Risk of displacement of homeless people

During the tournament, there may be risks to local homeless people of displacement or being forcibly moved on from public spaces. NGO stakeholders working in the area of homelessness and emergency housing identified that they are aware of this risk having been borne out in previous events.

This risk is particularly prevalent in Aotearoa New Zealand given the use of hotels and motels as emergency housing. Stakeholders shared anecdotal evidence of motellers pausing emergency housing contracts to take advantage of events and the associated tourist accommodation opportunities. Such risks will need to be examined by FIFA and the host governments at the local site levels to identify where and how these risks might materialise and be prevented.



WALTER

1



FIFA
REFEREE
2019

3.4 Risk Saliency Matrix

NOTE: This matrix reflects the raw risk ratings pre-mitigation.

Human rights risks were identified by desktop research and stakeholder consultations and were then plotted on a matrix against the following criteria and ratings:

- **Likelihood [Column A]** (how likely is the risk to occur within the next 3 years?):
 - Highly likely** (rights holders are currently at risk or highly likely they will be)
 - Possible** (rights holders may not currently be at risk but it is likely it will occur)
 - Unlikely** (although there is a risk, it is unlikely to impact rights holders over next 3 years)

The determination of the likelihood of a particular risk resulting involved a consideration of a number of different factors such as FIFA and the local entities' operating contexts in and around the tournament and the ability of the related business relationships (such as suppliers, sponsors, broadcasters and government entities) to effectively manage human rights risks. Some examples of factors that can increase the likelihood of risks resulting include the existence and enforcement or otherwise of national laws and regulations; conflicts between national laws and international human rights; social customs and practice, the presence of corruption and the presence of conflict.⁸⁵

- **Scope [Column B]** (how many people are likely to be affected by the harm?):
 - Major** (entire category of stakeholders e.g. all players or all children)
 - Moderate** (significant proportion of stakeholders or specific stakeholder groups e.g. all hospitality staff)
 - Minor** (a few people or a minor proportion of stakeholders e.g. one or two players)

- **Scale [Column C]** (what is the gravity of the impact on the human right(s)? of affected people):
 - Major** Severe or irrevocable violation/s of human rights (such as harm causing serious injury or death, extreme forms of labour exploitation)
 - Moderate** Substantial harm is caused
 - Minor** Some harm is caused
- **Remediability [Column D]** (will a remedy restore the victim to the same or equivalent position before harm):
 - Not remediable** (most serious, harm is not remediable)
 - Possibly remediable** (remedy may only partially return victim to same or equivalent position)
 - Fully remediable** (remedy will restore victim)

Risks are then ranked Tier 1, 2 or 3.

- Tier 1 risks must urgently be addressed as most salient.
- Tier 2 risks must be addressed as next most salient.
- Tier 3 risks should be addressed to prevent harm occurring.

Tier 1 risks require: likelihood is **highly likely** AND **two out of three** other assessment criteria are **red**.

Tier 2 risks require at least two of or the four assessment criteria to be **amber** or **red**.

Tier 3 risks are those which do not meet the criteria for Tiers 1 or 2.

Tier 1 risks are shown in bold font in the table that follows.

Risk

Risks to athletes' rights

1. **Sexual harassment and/or abuse of players.**
2. **Athletes suffer gender and sex discrimination through lack of pay parity, investment in the tournament, inappropriate health and welfare considerations for athletes and proportion of paid versus unpaid roles held by women and gender minorities.**
3. **Risk to athletes' worker rights, including freedom of association and collective bargaining, unsafe workplaces, and adequate working conditions, for players coming from other countries.**
4. **Player welfare including mental health is put at risk through inadequate support and policies.**
5. Media coverage promotes harmful stereotypes of athletes, e.g. inappropriate sexualisation, creates erasure of diverse identities, or promotes discrimination and abuse of marginalised groups such as transgender athletes, or risks the outing of athletes from countries where homosexual activity is criminalised.
6. **Transgender players and/or players with variations in their sex characteristics face discrimination under FIFA rules and are unable to participate in the tournament.**
7. Risk to athletes' rights to freedom of expression and association through the actions of FIFA and/or tournament sponsors.
8. Risk of athletes being subjected to discrimination by sponsors on the basis of sex, race, disability, sexual orientation or gender identity or sex characteristics.
9. Athletes face online abuse, discrimination and/or harassment from FIFA's media and broadcast partners, including sexual harassment.

Risk to worker's rights

10. **Sexual harassment and/or abuse of workers.**
11. **Exploitation of workers, in cleaning, hospitality (highly feminised sectors in Australia and Aotearoa New Zealand and therefore increased risk to vulnerable women, including women from culturally and linguistically diverse backgrounds, as well as many young workers) and security sectors.**
12. **Extreme forms of labour exploitation (including in FIFA and local entities' supply chains).**
13. Exploitation of migrant workers including by illegal forms of overseas recruitment into Australia and/or Aotearoa New Zealand (particularly in the hospitality industry).

Likelihood A	Scope B	Scale C	Remediability D	Raw risk rating Tier (1/2/3)
				1
				1
				1
				1
				2
				1
				3
				3
				2
				1
				1
				1
				2

Risk

Risk to worker’s rights (continued)

- 14. Workers cannot access their minimum employment rights, due to failure by employers (whether FIFA local entity and/or suppliers or subcontractors) to comply with mandated employment standards including paid breaks, working hours and protections against wage theft. (Higher in specific industries – can include issues like classification of employees as contractors).
- 15. Workers’ rights are undermined through tender processes for supplying services that act as a ‘race to the bottom’.
- 16. Employees’ right to freedom of association is breached, particularly through the use of labour hire companies.
- 17. Workers’ safety is compromised by exposure to alcohol-related harms including sexual harassment, abuse and lack of employment support and training.

Risks to rights to equality and non-discrimination for all participants, spectators and the broader community

- 18. Lack of opportunity for women to be representatively included in all aspects of the tournament including management roles for example, broadcasting, security, referee/match officials, medical, operational delivery (hospitality, venue management).
- 19. **Players, officials, volunteers and spectators experience racial abuse and harassment.**
- 20. Lack of opportunity for diverse communities including culturally and linguistically diverse communities to be representatively included in all aspects of the tournament including management roles for example, broadcasting, security, referee/match officials, medical, operational delivery (hospitality, venue management).
- 21. Lack of cultural safety for the 32 different nations and multiple cultures taking part in the tournament as players, officials and spectators.
- 22. Risks of infringements on the rights to equality and non-discrimination, through the application of any technology that is created or used to facilitate the operations of the tournament. This will include the use of artificial intelligence by security, ticketing apps and websites, COVID-19 protocols, or apps that are developed as communication tools, complaint mechanisms and/or information portals.
- 23. The tournament facilities and environments fail to cater for the needs of women, carers, families, young children, disabled people and culturally diverse communities.
- 24. Athletes, fans and the broader community suffer online abuse or harassment, notably sexism, racism and homophobia.
- 25. Spectators, fans, and broader communities suffer alcohol-related harms, including violence, sexual harassment and abuse, and domestic/intimate partner violence.

Likelihood A	Scope B	Scale C	Remediability D	Raw risk rating Tier (1/2/3)
				2
				2
				2
				2
				2
				1
				2
				2
				2
				2
				2
				2
				2

Risk

Risks to rights to equality and non-discrimination for all participants, spectators and the broader community

26. Historically underrepresented/marginalised communities (e.g. tangata whenua, Aboriginal peoples and Torres Strait Islanders, Pacific peoples, culturally and linguistically diverse, disabled people, young people from low-income communities) do not receive the benefits of social procurement across the tournament.
27. **Women’s and Indigenous football programmes are disadvantaged by allocation of legacy programme funds, in favour of mainstream men’s sport.**

Risks to the rights of Indigenous peoples

28. **Exclusion and marginalisation of Indigenous peoples (i.e. Aboriginal and Torres Strait Islander people and tangata whenua).**
29. **Tokenistic representation of Indigenous peoples (i.e. Aboriginal and Torres Strait Islander people and tangata whenua).**
30. Indigenous peoples with cultural authority over their local regions (mana whenua) are excluded or marginalised from partnership, due to FIFA developing a primary partnership relationship with local council and their Māori teams (in Aotearoa New Zealand) or with elders and representatives of different nations including where lands may be contested (in Australia).
31. Tangata whenua are excluded from major decisions in the development process, including by being included in consultation too late.
32. Cultural integrity is disrespected, including through dishonorable or inappropriate treatment of Indigenous tohu/symbols and toi/art.
33. **Tangata whenua or local Aboriginal and Torres Strait Islander peoples do not receive financial and other benefits generated by the tournament despite the hosting of that tournament on Indigenous land.**

Risks to children’s rights

34. **Abuse, neglect or exploitation of children, particularly volunteers and players under 18.**
35. Children’s safety is breached in relation to the capturing and storage of images of children across the tournament.
36. Children’s rights to participation, safety and wellbeing are impacted by inadequate consultation regarding their participation in Fanfests and other tournament roles.

Likelihood A	Scope B	Scale C	Remediability D	Raw risk rating Tier (1/2/3)
				2
				1
				1
				1
				2
				2
				2
				1
				1
				2
				2

Risk

Risks to the rights of Disabled People

37. **Exclusion of disabled people including physical and technological accessibility (particularly ticketing and pre-sale).**

38. Disabled people are not consulted to provide advice and input on the diverse needs of disabled people, and on ways to create an accessible tournament.

Risks to the rights of volunteers

39. Volunteers suffer labour exploitation through being asked to perform roles similar to or which should be classified as paid roles.

40. Marginalised and traditionally underrepresented groups including Indigenous, disabled, culturally diverse and low-income communities are excluded from volunteering opportunities.

Risks to the rights to life, health and safety from the failure to respond appropriately to external factors

41. **Risk to life, health and safety of players, workers and spectators should a terror attack occur at a stadium or city during the tournament.**

42. **COVID-19 (or other major health risk) outbreak or resurgence, or an extreme weather event occurs during the tournament.**

43. Players or spectators from countries identified as high risk due to the political landscape or COVID-19 pandemic face visa issues and cannot participate in the tournament.

44. Negative impacts on the right to a clean, healthy and sustainable environment caused by tournament organisers and hosts' failure to put in place responsible environmental policies for the tournament

Risks to the rights of people seeking asylum

45. Players, support crew, or fans claim refugee status on arrival in Australia or Aotearoa New Zealand and risk refoulement if not adequately supported to gain protection

Risks to the rights of people who identify as LGBTQI+

46. Players, officials and spectators experience abuse and harassment on the basis of their sexual orientation, gender identity and expression, or sex characteristics.

47. Athletes and spectators cannot fully enjoy their freedom of expression with respect to their sexual orientation, gender identity and expression, or sex characteristics.

48. Facilities are not inclusive for athletes, officials or spectators who identify as LGBTQI+.

Likelihood A	Scope B	Scale C	Remediability D	Raw risk rating Tier (1/2/3)
				1
				2
				2
				2
				1
				1
				2
				2
				2
				2
				2
				2

Risk

Risks to the rights of people experiencing homelessness or disruption to regular services

49. **People experiencing homelessness or living in emergency/temporary housing, such as motels and hostels, are displaced during the hosting of the tournament. Vulnerable people are deprived of access to essential support services due to transport and other disruptions during the tournament.**

Risks to the right to remedy

50. **Lack of a grievance mechanism and remedy for people who suffer harm.**

51. **Ineffective grievance mechanisms silence or retraumatize people who have experienced harm or abuse.**

52. Grievance mechanisms do not facilitate access to effective remedy in a timely manner or are hard to access.

53. **Complainants using grievance mechanisms face retaliation due to breaches in confidentiality and lack of independence.**

Risks to human rights defenders and journalists

54. Risk to human rights defenders' (including athletes' and spectators') liberty and security of person, when exercising their rights to freedom of expression and/or right to protest during the tournament, as a result of actions of security forces.

55. Restrictions on freedom of expression and association, and the ability of journalists to perform their jobs without impediment (such as by gaining access to tournament sites) arising from government restrictions or security forces.

56. Journalists face discrimination and/or harassment from FIFA's media and broadcast partners, including sexual harassment.

Risks to the rights to data privacy

57. Data privacy issues and risks associated with the collection, storage and use of personal information collected about individuals, such as through apps and ticketing.

Likelihood A	Scope B	Scale C	Remediability D	Raw risk rating Tier (1/2/3)
Red	Red	Red	Orange	1
Red	Orange	Red	Red	1
Red	Orange	Red	Red	1
Red	Orange	Orange	Orange	2
Red	Red	Red	Red	1
Green	Orange	Orange	Green	3
Green	Green	Green	Orange	3
Red	Orange	Green	Orange	2
Red	Red	Orange	Orange	2



4. Recommendations

There are numerous entities involved in the planning, preparation and delivery of the tournament. Accordingly, the recommendations identify which entity or entities may be best placed to lead the response on particular issues.

It is recognised that the tournament takes place over a period of four weeks but in addressing the risks that may arise out of the FWWC2023, this risk assessment considered a wider period including the full lifecycle of the event covering the planning, preparation, and delivery of the tournament. In addition, the FWWC2023 is set against a backdrop of broader human rights issues both in the host countries and internationally, and within the world of football itself, with respect to a number of issues such as the supply chains of goods and services and the teams competing in the tournament. Accordingly, the distinction between direct and systemic human rights risks has been reflected in the table.

It is also recognised that FIFA and the local entities are unlikely to be able to comprehensively address or mitigate systemic human rights risks on their own or over the course of the FWWC2023.

It is noted that under the UNGPs compliance with the domestic laws of the host nation are a minimum expectation, but where those laws do not reflect international human rights standards then businesses should seek ways to honour the principles of internationally recognised human rights.

FIFA Women's World Cup 2023 Human Rights Risk Assessment – Recommendations

The Risk Assessment has identified 57 salient risks. Recommendations to address these risks are provided in the table below.

KEY:

Athlete rights	A
Worker rights	W
Media risks	M
Event risks	E
Gender equality, intersectionality and discrimination	G

HUMAN RIGHTS FRAMEWORK & LEADERSHIP COMMITMENT

FIFA and the local entities establish a human rights framework for the FWWC2023 that includes:

- A statement of commitment to human rights in accordance with the UNGPs for the FWWC2023 which are publicly launched in conjunction with the host governments.
- A gender equality policy that adopts an intersectional approach for the tournament that sets targets for representation and that guides decisions in recruitment, contracting etc.
- Establishment of a cultural ambassadors program to promote engagement with the game by women and girls from diverse backgrounds, especially culturally and linguistically diverse communities, tangata whenua and Aboriginal and Torres Strait Islander peoples.
- Engagement with historically underrepresented and marginalised communities in planning and hosting local tournament-related events such as Fanfests, meet and greets, and other community engagement opportunities and mitigation of adverse impacts of the tournament on local communities such as access to essential services.
- An accessibility policy and plan (see below for recommendation on accessibility).
- A Reconciliation Plan (RAP)⁸⁶ for Australia that complements local government/stadiums RAPs.
- Community engagement principles to guide Aboriginal and Torres Strait Islander consultation and engagement.
- The AHRC's National Principles for Child Safe Organisations⁸⁷ are adopted.
- A social procurement policy for the FWWC2023 that guides direct and supplier procurement and enables as broad a reach as possible to ensure benefits flow to marginalised communities and that reflects the diversity of the competing teams and host countries' societies.
- A homelessness protocol that sets out expectations that the tournament and related activities are conducted with respect for the rights and dignity of affected people and that provides for their safety and accommodation, drawing on good practice such as the learnings from the 2018 Gold Coast Commonwealth Games, in conjunction with key stakeholders including State government, regional and local councils, and mana whenua or local Indigenous peoples.
- Human rights compliant protocols for emergency events such as terrorism, pandemic, natural disasters etc.
- Provision for an evaluation to be conducted of the protection of human rights with respect to the FWWC2023 at the completion of the tournament.

Applicable risks	Area/Group affected	Direct/Systemic
<p>1, 18, 20, 21, 22, 26, 28, 30, 34, 41, 46, 47, 49</p>	<p>E, G</p>	<p>D</p>

DISCRIMINATION, ABUSE, VIOLENCE AND HARASSMENT

All participants (whether players, officials, spectators, workers etc) are provided with information about their right to be free from discrimination, abuse, violence and harassment, protections against discrimination, abuse, violence and harassment in Australia/NZ and how to seek help in the host countries should this occur.

FIFA and the local entities develop a comprehensive discrimination, abuse, violence and harassment prevention strategy and action plan for the FWWC2023 in consultation with experts and survivors that includes:

- A code of behaviour for the tournament that reinforces zero tolerance for all forms of discrimination, abuse, violence and harassment (sexism, racial, homophobia) that applies to all rights holders equally.
- Adoption of the AHRC's [Guidelines for Addressing Spectator Racism in Sports](#) for the tournament.
- Clear governance and accountability mechanisms that articulates leadership and responsibility to prevent discrimination, abuse, violence and harassment.
- The process for responding to complaints of discrimination, abuse, violence and harassment, including grievance mechanisms (see below).
- A survivor engagement framework that is trauma informed for those who have suffered harms such as physical, sexual, or psychological abuse and who may not want to engage with statutory bodies or police.
- Training on sexual harassment prevention and bystander intervention training for all tournament workers (including hospitality and security staff), teams and officials.
- Training for hospitality workers on preventing alcohol-related harms and that they are supported to seek assistance, if needed.
- A policy on the sale and consumption of alcohol in tournament stadiums and Fanfests.
- Issue media guidelines on safe and respectful reporting that promotes inclusion.

This strategy should consider the needs and risks facing women and diverse and vulnerable groups.

That FIFA considers the tournament an opportunity to engage on the issue of violence against women in the host countries and develop a related social awareness/prevention campaign, such as the 'Don't guess the yes' campaign in Aotearoa New Zealand or 'Who are you?', a bystander intervention programme utilised when Aotearoa New Zealand hosted the 2011 Rugby World Cup.⁸⁸

That FIFA considers addressing alcohol culture in sport including by adopting a position to have no alcohol companies as naming sponsors.

That FIFA in its legacy plan, includes a participation pipeline program for women and girls and particularly indigenous women and girls and a para-football program for women and girls with disability.

That FIFA considers the inclusion of exhibition para-football games during breaks or before tournament matches.

Applicable risks	Area/Group affected	Direct/Systemic
1, 10, 24	A W	D
1, 5, 10, 13, 17, 19, 25	A, W, E, G, M	D
25	E, G	S
25	E	S
27	G	S
40	G	S

ONLINE ABUSE

To specifically address online abuse, FIFA and the local entities:

- Draw on the guidance of the E-Safety Commissioner in Australia and Netsafe in Aotearoa New Zealand to ensure compliance and best practice by broadcast partners.
- Ensure they understand their obligations under local laws including laws introduced to specifically address online abuse in the host countries.
- Advocate for and work with host governments to provide for and enable the implementation of powers to take down offensive, discriminatory or abusive material.

FIRST NATIONS PEOPLE

To promote and ensure respectful and genuine inclusion of First Nations people in the host countries, FIFA and the local entities:

- Be guided by the UNDRIP principles of self-determination, participation in decision-making, respect for and protection of culture, equality and non-discrimination as a minimum.
- Consider the establishment of an Aboriginal and Torres Strait Islander advisory group to inform tournament activity.
- Develop a partnership framework founded on Te Tiriti o Waitangi and its principles (particularly Partnership, Participation, and Protection) and informed by UNDRIP. This partnership framework should include recognition of the range of mana whenua across Aotearoa who hold authority in their local region and who will hold primary partnership relationships with FIFA for that particular region. Māori women's leadership, rights, and unique role and status from a cultural perspective (mana wahine) must also be upheld in this partnership.
- Establish a co-designed programme in partnership with local indigenous peoples (Aboriginal and Torres Strait Islander peoples and First Nations football stakeholders in Australia and tangata whenua, mana whenua and Māori football stakeholders in Aotearoa New Zealand), for the development of a policy regarding investment back into the community where financial benefit is generated from the FWWC2023 being held on Māori or Aboriginal land (or otherwise drawing from indigenous resources). These policies may also include targets for indigenous procurement or other involvement. See above recommendation regarding a social procurement policy.

PHYSICAL SPACES & ACCESSIBILITY

To ensure accessibility, FIFA and the local entities:

- Work with ticketing third parties to ensure accessible access to tickets.
- Work with the stadiums to ensure they meet Australian and NZ accessibility standards as a minimum, and higher standards where this is achievable.
- Ensure accessibility audits of stadiums are undertaken to ensure compliance and to maximise opportunities for accessible seating.
- Promote communications and technology in support of the tournament that are accessible for people with disabilities, including easy read materials (such as Easy Read, NZSL and AUSSL, Braille and Large Print). FIFA should where possible work with local providers of accessible formats.

Applicable risks	Area/Group affected	Direct/Systemic
5, 9, 24, 56	A, E, M	D/S
28, 29, 30, 31, 32, 33	E, G	D/S
38, 48	E, G, M	D/S

PHYSICAL SPACES & ACCESSIBILITY (continued)

To promote safety and inclusion at tournament games, FIFA and the local entities require in stadiums and Fanfest areas:

- alcohol-free zones
- family-friendly areas
- pride zones

FIFA and the local entities work with host governments, stadiums and local suppliers to ensure:

- Equal facilities for women and men across stadiums and community grounds, including women's changing rooms, as well as accessible and inclusive amenities for all participants.
- Facilities that cater for the diverse needs of women and provide for breast-feeding facilities, prayer rooms and quiet spaces.

CHILD SAFEGUARDING

To safeguard children, FIFA and the local entities, in consultation with experts:

- Adopt and implement FIFA's safeguarding policy.
- Undertake an audit of local laws to understand and comply with child safeguarding and mandatory reporting requirements including regarding criminal history and Working with Children Checks/Police Vetting.
- Ensure that child volunteers are provided with information about their rights.
- Develop a permissions policy and authorisation process for the tournament to be implemented for child volunteers and players under 18.

LABOUR EXPLOITATION

To prevent exploitation of workers, particularly in identified high risk sectors such as cleaning, hospitality and security FIFA and the local entities:

- Audit Australian and Aotearoa New Zealand employment laws, including work, health and safety laws, to understand and ensure employment processes of FIFA, the local entities and contracted entities comply.
- Undertake due diligence to identify and address risks of exploitation or actual exploitation of workers in their supply chains and those of their contracting partners. This may include partnering with organisations that have sector expertise such as the 'Cleaning Accountability Framework' in Australia.
- Communicate to stadiums and suppliers FIFA's policy on prohibiting labour exploitation that should reference underpayment of wages and wage theft.
- Establish minimum standards on fair working conditions as a precondition for successful tenders to supply services.
- Ensure that every worker, employed or contracted by FIFA or the local entities in connection with the FWWC2023 and their direct suppliers, is provided with information on their rights at work (similar to the Australian Fair Work Statement) in the host countries (available in multiple languages) and where to seek help should it be needed.
- Consider the establishment of pop-up worker rights information hubs near key venues and spot checks on working conditions before, during and after FWWC2023 events.

Applicable risks	Area/Group affected	Direct/Systemic
25, 47	E, G, W	D
2, 23	E, G	D
34, 35, 36	E	D
11, 12, 13, 14, 15, 16, 17	W	D/S

LABOUR EXPLOITATION (continued)

That FIFA includes provisions in their agreements with sponsors to respect human rights, to undertake their own human rights due diligence and provide FIFA with information on how they are addressing the salient risks they have identified.

PLAYERS

FIFA and the local entities ensure that FWWC2023 players have access to the same conditions as provided for in the Men's World Cup and develop comprehensive plans to address the inequity in prize money awarded for the Women's World Cup as compared to the Men's World Cup.

FIFA ensures that family-friendly accommodation be made available for athletes and their team entourages.

FIFA and the local entities engage with Member Associations, Professional Footballers Australia and other player associations and other worker advocacy groups such as unions, to raise awareness of the rights of all athletes participating in the FWWC2023 (including visiting players) to the following:

- Right to freedom of association and collective bargaining;
- Right to a safe work environment;
- Right to adequate employment conditions; and
- Right to safe protest.

FIFA and the local entities develop a player welfare and support policy that prioritises the needs of players, is disseminated to all playing countries ahead of the tournament and consider the establishment of a central support and welfare mechanism.

In keeping with good practice to ensure all policies and procedures are up to date and relevant, FIFA:

- Finalise the process to replace the so-called FIFA Gender Verification Regulations of 2011 through a new regulation that promotes inclusion and non-discrimination. The new regulation should be developed in consultation with transgender athletes to ensure it respects and reflects their rights to inclusion, dignity and respect.
- Review its policies to ensure athletes' and workers' (including coaches, team entourages and tournament officials) rights to freedom of expression and association are explicitly protected.

Applicable risks	Area/Group affected	Direct/Systemic
7, 8, 9	W, E, G, M, A	D/S
2	A, G	S/D
2, 4, 18, 23	A, G	D
3	A, E	S/D
4	A	D
6, 7, 16	A	S

VOLUNTEERS

To ensure the safe and inclusive participation of volunteers, FIFA and the local entities:

- Develop a volunteer policy that clearly defines the scope of volunteer roles that is consistent with and gives regards to, legal protections that exist in the host countries.
- Ensure that roles which should be characterised as paid employment are duly recognised by FIFA and the local entities and adequately compensated.
- Ensure that recruitment of volunteers includes targets to ensure diverse representation including First Nations people, people with disability, culturally and linguistically diverse people.
- Ensure costs associated with volunteering for people from marginalised groups be met such as travel (from remote areas/outside city centres), accommodation if required, per diems etc.
- Consult with local organisations such as Volunteering Australia and Sport Inclusion Australia in Australia, and Volunteering New Zealand and Sport New Zealand in Aotearoa New Zealand to develop good practices.

GRIEVANCE MECHANISM

That FIFA considers the adoption of an accessible, free, non-discriminatory grievance mechanism that:

- Is independent, trauma informed, confidential and prioritises the wellbeing of the complainant, which has been developed with reference to international human rights standards, such as that developed by the World Players Association, with the technical assistance of the Permanent Court of Arbitration.
- Is staffed with trained professionals.
- Is culturally sensitive and culturally safe.
- Is available to all participants including players, workers, volunteers, officials, spectators.
- Complements existing local complaint mechanisms that are well promoted.

That FIFA and the local entities consider providing competitors with trained 'player advocates' who can be available to athletes who may wish to reach out with concerns and seek advice – to appropriately support and refer such players.

MEDIA

With respect to the role of the media in the WWC2023, FIFA and the local entities:

- Consider establishing a grant scheme to support diversity in media reporting of the tournament, with a focus on increasing the number of women.
- Establish targets for representation of women in on and off-camera roles in the media coverage of the tournament.
- (In addition to media guidelines recommendation above as part of the human rights framework).

Applicable risks	Area/Group affected	Direct/Systemic
39, 40	E, G	D/S
50, 51, 52, 53	E	D
5	A, W	S/D

EMERGENCY AND DISASTER RESPONSE

In recognition that emergency, disaster and safety considerations will be reviewed and planned for the tournament, FIFA and the local entities:

- Ensure any response to such an emergency adhere to the principle that limits on rights be proportionate, reasonable, for the shortest time possible and regularly reviewed.
- Formulate a COVID-19 safety plan that integrates a human rights approach and consider guidance from the Australian and Aotearoa New Zealand and relevant state and territory governments, the Australian and New Zealand Human Rights Commissions, the Fair Work Commission, SafeWork Australia and WorkSafe NZ.⁸⁹
- Signals its support of human rights defenders and the right to protest and communicates and demonstrates this support through its actions should such situations arise during the tournament.
- Work with government agencies and contractors to ensure that state law enforcement and private security providers are trained in understanding and respecting rights.
- Establish a human rights dialogue with civil society representatives for the planning and delivery of the tournament to enable the prompt communication and resolution of any concerns.

That FIFA and the local entities have clear lines of communication with relevant government officials to address any concerns related to the protection of players, support crew or spectators seeking asylum, or with respect to the inability to enter the host countries and/or participate in the tournament due to immigration or quarantine matters.

LOCAL COMMUNITY

That FIFA and the local entities engage with host governments and key stakeholders in the planning and delivery of the tournament to ensure minimal disruption to essential services, with particular attention to be paid to vulnerable or historically marginalised groups such as the elderly, disabled people, indigenous people, ethnic or faith-based minorities and homeless people.

ENVIRONMENT

That FIFA's sustainability strategy appropriately considers and mitigates risks to the environment.

PRIVACY

FIFA obtain legal advice on its obligations under privacy laws in the host countries and undertake a privacy assessment to assist it to operationalise its commitments to protecting the privacy of spectators and others about whom it holds personal information.

Applicable risks	Area/Group affected	Direct/Systemic
42, 54	E	D
41, 42, 43, 45, 55	E	D
49	E	D
44	E	S/D
57	E	D



5. Human rights legacy opportunities

This Human Rights Risk Assessment has necessarily focused on the potential adverse impacts that the FWWC2023 might pose. The process has also sparked enthusiasm and inspired many conversations with key stakeholders as to the possible human rights legacy and opportunities that the tournament presents for Australia and Aotearoa New Zealand. Ultimately, the success of the tournament will be judged by the lasting impact it leaves on the players, workers and the broader communities in the two host nations.

In 2013, an Australian parliamentary inquiry was conducted to inquire into the participation of Aboriginal and Torres Strait Islander peoples in sport.⁹⁰ This inquiry focused on two issues; increasing Indigenous participation in sport and secondly utilising sport to improve Indigenous wellbeing and support the Close the Gap⁹¹ targets. The inquiry's report, 'More than Just a Game', highlighted the positive impacts on a wide range of human rights issues and life outcomes that participation in sport can support. It also noted the importance of and benefits that flow from involving the community in any initiatives designed to increase participation by Aboriginal and Torres Strait Islander peoples in sport. It is notable that there is a significant discrepancy in participation rates at the community level between Aboriginal or Torres Strait Islander boys and girls. The significant underrepresentation of girls in this context requires specific and targeted measures to bring about gender parity in participation rates.

Stakeholder engagement through this process has identified a range of issues that would be a natural and fitting human rights legacy for the FWWC2023. Accordingly, FIFA, the local entities and/or the host governments are encouraged to consider how to address these issues as part of their strategic planning for and beyond the FWWC2023. The key issues and opportunities identified are set out below:

- **Gender equality**—creating pipelines for women's leadership and achieving gender parity in participation and representation beyond players, to include officials, referees, coaches and all involved in women's football, access to facilities, pay, sponsorship, media coverage, and creating a culture of respect, that is free from abuse. Further, changing the way in which women athletes and the women's game is spoken about, without sexualising athletes and being sexist.
- **Volunteers**—building a diverse and inclusive community for Australian and Aotearoa New Zealand Football.
- **Indigenous partnership**—building institutional understanding of the importance of appropriate and meaningful partnership, engagement and recognition of tangata whenua and Aboriginal and Torres Strait Islander peoples through MSEs and best practice approaches in this area, with Australia learning lessons from and building a closer partnership with Aotearoa New Zealand on this and other issues.
- **Diverse media representation** in the coverage of sports, both in terms of stories that are told, who tells those stories and how they are told.
- **Social procurement that supports Indigenous enterprise** and other underrepresented or marginalised groups, and investment back into communities hosting the tournament.
- **Addressing racial equality** through a broad campaign with the aims of reducing spectator abuse, improving civility and support on social media especially for women and people with diverse identities who experience intersecting forms of discrimination.

- **Addressing sexual and gender-based violence** including violence associated with alcohol consumption, through education and training opportunities and communications campaigns.
- **Increasing the opportunities for and the participation of Indigenous children and young people** in football, particularly for women and girls.
- **Increasing visibility of the needs of and opportunities for participation by disabled people** in all areas associated with the tournament.
- **Improving accessibility in multiple stadium and hotel facilities.**
- **Creating para-football teams.**
- **Conducting a players' rights impact assessment** to examine the pipeline of players of the FWWC2023 and beyond, and comprehensively assessing the systemic human rights impacts on players in conjunction with players associations.
- **FIFA working with its Member Associations to communicate and uphold standards of gender equality,** and exercise oversight of funds marked to drive gender equality and other diversity and inclusion initiatives.
- **FIFA working with its Member Associations and players associations to establish a framework for minimum standards and accountability** and to identify situations of extreme labour exploitation of players that form part of the pipeline of players participating in the FWWC2023.

During First Nations consultations, the following opportunities were identified. Where reference has been made to the Indigenous peoples of Australia or Aotearoa New Zealand specifically, this was due to specific engagement with respective representatives from those groups.

It was however recognised that the human rights risks identified are likely to relate to Indigenous peoples in both host countries, and accordingly, learnings from these consultations should be reviewed as part of FIFA and the local entities' Indigenous engagement more broadly.

- **Meaningful partnerships and Indigenous representation.** Having a Māori voice at every level of decision making will make building relationships with tangata whenua easier. Having the cultural capability to engage and demonstrating a commitment to working in genuine partnership will be required. In Australia, it is important to engage with elders and traditional custodians from the different traditional lands upon which the tournament will be taking place, recognising the diversity of cultures and perspectives.
- There are significant opportunities for FIFA to use the tournament as a platform for social change and to create positive impacts by strengthening and **demonstrating its commitment to Indigenous rights.**
 - Stakeholders mentioned the positive example of Hinewehi Mohi deciding to sing the Māori language version of the New Zealand anthem for the first time at a sporting event. This greatly promoted Māori language rights, but stakeholders noted it was a personal decision rather than being systemically backed by government or official entities, and they emphasised that with FIFA's support, these kinds of legacy opportunities can be greatly enhanced.
- **Enduring benefits** for Indigenous peoples globally could be achieved by ensuring that learnings and good practices, from this and previous tournaments, are embedded into FIFA's ongoing operations.



- The FWWC2023 presents major opportunities to promote and **advance the sport amongst Māori whānau (families) and communities, as well as for strengthening the representation and voice of Māori within the sport's domestic structures.** Organisers for other MSEs have developed initiatives to support tamariki (children) and rangatahi (young people) involvement with events – see for example the work initiated by the ICC Women’s Cricket World Cup 2022.⁹²
- It will be vital that **Māori women’s leadership, rights, and unique role and status from a cultural perspective (mana wahine) are given due prominence.** Women’s sporting events often present women in the advertising alongside children rather than performing their sport whereas the advertising for men presents them as strong and larger than life.

Stakeholders identified this as an opportunity to challenge that and set a precedent for future sporting events.

- Māori culture and values featured prominently in the original Aotearoa New Zealand bid, including the core principles of Manaakitanga, Kaitiakitanga, and Kotahitanga. There is an opportunity for this theme to continue, and for **Te Ao Māori (the Māori world) to be at the heart of the tournament in a genuine and authentic way.** Stakeholders recognised this as an opportunity for FIFA to look back at previous events at where they failed to fully engage or represent Indigenous people and learn from that.
- It was also identified that FIFA has significant social capital so by being vocal about the standards it is setting in a number of areas there is an **opportunity to educate on and normalise upholding human rights, thus raising the bar for other major events.**

Appendix 1: Stakeholder engagement

Overview of the consultation process

The AHRC convened eight virtual roundtable consultations and a number of individual interviews with key stakeholders, engaging with over 120 individuals from at least 65 different organisations, covering the following three broad groups of rights-holders: players, coaches and support staff/team entourages; workers (including in supply chains) and volunteers; and spectators and local communities. Two roundtables were also held on cross-cutting issues covering (1) safeguarding and child protection, gender equality and LGBTQI+ rights and (2) disability rights, racial equality and the rights of Aboriginal and Torres Strait Islander peoples. Two further roundtables were held with federal government agencies and on the human rights legacy of the FWWC2023.

The NZHRC conducted seven separate virtual roundtable consultations and engaged with 60 individuals from at least 50 different organisations, in addition to those that participated in the joint consultations.

In addition NZHRC held four sessions that focused on priority rights holder groups. These included roundtables dedicated to Māori and LGBTQI+ stakeholders and two cross cutting issue roundtables on (1) safeguarding children, disability rights and gender equity and (2) sexual harm prevention, poverty and homelessness and hospitality worker rights.

Joint Trans-Tasman consultations sessions were held by AHRC and NZHRC with stadium managements, current and former players and their representatives, and host cities and state governments. These were conducted where it was considered that a shared voice (for example players) or an opportunity to support Trans-Tasman learning (for example stadia managers and local government) would be beneficial to the stakeholders going forwards.

The AHRC and the NZHRC extends its thanks to the following individuals and organisations for their engagement and input into this Human Rights Risk Assessment. The AHRC and the NZHRC acknowledges that whilst participants' input has informed this report, it does not necessarily represent the views of those who were consulted.

List of stakeholders consulted

Expert Advisory Group

The Expert Advisory Group participated in consultations and were asked to review and provide feedback on the risk saliency matrix.

Rachel Davis, Co-Founder and Vice President, Shift

Craig Foster AM, Former professional footballer, Broadcaster and Human Rights Advocate

Professor Susan Harris Rimmer, Griffith University

Tanya Hosch, Executive General Manager – Inclusion and Social Policy, Australian Football League (AFL)

Brendan Schwab, Executive Director, World Players Association, Uni Global Union

Individuals consulted

1. Moya Dodd, *former* Australian national women's football player & football official
2. Craig Foster, *former* Australian national men's football player and journalist
3. Kieran Pender, sports journalist and human rights lawyer
4. Alex Wilkinson, Socceroo, Australian national men's football player
5. Pat Vidgen PSM, *formerly with* GOLDOC
6. Chelli Easson, *formerly with* GOLDOC

Organisations consulted

Australia

7. Adelaide Venue Management Corporation
8. Anti-Discrimination NSW
9. Argentina Women's National Football Team/W-League Player
10. Attorney-General's Department
11. Australian Catholic University
12. Australian Council of Trade Unions
13. Australian Border Force

14. Australian Football League
15. Australian Government Department of Health
16. Australian Human Rights Commission
17. Australian Human Rights Institute, UNSW
18. Australian Institute of Sport
19. Australian Sports Commission
20. Australian Trade and Investment Commission
21. Centre for Sport and Human Rights
22. Cleaning Accountability Framework
23. Department of Home Affairs
24. Disability Sports Australia
25. Eden Park
26. FIFA New Zealand
27. FIFPRO
28. Football Australia
29. Football Ferns
30. Football New Zealand
31. Griffith University
32. IP Australia
33. John Moriarty Foundation
34. Law Institute of Victoria
35. Melbourne & Olympic Parks
36. New Zealand National Team
37. Oceania Football Confederation
38. Office of the Children's Guardian
39. Office of the Fair Work Ombudsman
40. Pride in Sport
41. Professional Footballers Australia
42. Queensland Human Rights Commission
43. Royal Melbourne Institute of Technology
44. Shift
45. Sport Australia
46. Sport & Rights Alliance
47. Sport Inclusion Australia
48. Sport Integrity Australia
49. Sport New Zealand
50. Suncorp Stadium
51. Tennis Australia
52. The Treasury
53. United Workers Union

54. University of New South Wales
55. University of Richmond
56. Venues Live
57. Venues NSW
58. Venues West
59. Victorian Equal Opportunity and Human Rights Commission
60. Volunteering Victoria
61. Volunteering Australia
62. World Players Association

Aotearoa New Zealand

63. Accident Compensation Corporation
64. Auckland Unlimited
65. Auckland City Mission
66. Barrier Free Trust
67. Capital Football
68. CCS Disability Action
69. Centre for Sport and Human Rights
70. Christchurch Methodist Mission
71. Cleaning Accountability Framework
72. Council of Trade Unions
73. Deaf Aotearoa
74. Eden Park
75. FIFA New Zealand
76. FIFPRO
77. First Union
78. Football Ferns (including former players)
79. Football New Zealand
80. Football South
81. Halberg Foundation
82. Hamilton H3 Group
83. Human Rights Commission
84. Intersex Trust Aotearoa
85. Lumin Research
86. Māori Football Aotearoa
87. Māori Rugby
88. Māori Netball
89. Manukau United Football
90. Massey University
91. Ministry for Women

92. New Zealand National Team
93. Northern Region Football
94. Oceania Football
95. Paralympics New Zealand
96. Planet Ally
97. Public Service Association
98. Rainbow Tick
99. Raise The Bar
100. RespectED
101. RH Consulting (Child Protection Consultant)
102. Safeguarding Children
103. Sport Manawatū
104. Sport New Zealand
105. Te Puni Kōkiri
106. Tiwhanawhana
107. Unite Union
108. WaiBop Football Federation
109. Yes Disability

List of submissions

Five written submissions were received, including a substantial submission from the Professional Footballers Association (PFA), which has been quoted in this report and was provided directly to FIFA, with the permission of the PFA.

Full name	Organisation
Beau Busch and Kathryn Gill	Professional Footballers Australia
Chad Hooker	Hamilton City Council
Lorraine Guthrie	CCS Disability Action and BarrierFree
Michael Rahme	
Nicole Dryden	

Appendix 2: UNGPs framework

- Respect, protect and remedy (3 pillars framework) with 31 principles.
- Human rights due diligence, is a process to identify, prevent, mitigate and account for how a business addresses its adverse impacts on human rights. The focus of human rights due diligence is identifying and preventing the risks of risk of harm to *people* caused by a business's activities and relationships (such as FIFA's direct activities and those of its partners and suppliers).
- Businesses should identify their human rights risks and prioritise identifying the most severe risks first. Severity is based on three criteria; the scale, scope and remediability of the adverse human rights impacts.
- A business enterprise, such as FIFA, should have processes in place to enable the remediation of any adverse human rights impacts they cause or to which they contribute.
- Where a business enterprise, such as FIFA, identifies that it has caused or contributed to adverse impacts, it should provide for or cooperate in their remediation through legitimate processes.
- Where adverse impacts have occurred that the business enterprise, such as FIFA, has not caused or contributed to but which are directly linked to its operations, products, services or business relationships then the appropriate action to be taken will vary according to the circumstances. For instance, it may be appropriate for the business enterprise to use its leverage and influence to encourage its business partners and associates to remediate harms that they have caused or contributed to.

Endnotes

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- The resources will include:
- Policy templates for racial discrimination and other important policies
 - Guidelines for effective complaints handling
 - Content for insertion into Member Protection Policies
 - Guidelines for creating communications content to promote the tool
 - Guidelines for engaging in bystander intervention
 - Checklists for creating anti-social behaviour reporting mechanisms
 - Support services available for targets of racism
 - Guidelines for working with a trauma-informed approach
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