

FOOTBALL FOR HUMAN RIGHTS

Embedding human rights promotion and protection through and within European football

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Glossary of Terms

CSOs	Civil Society Organisations
CSR	Corporate Social Responsibility
BHR	Business and Human Rights
ECJ	European Court of Justice
ECOSOC	(United Nations) Economic and Social Council
EPAS	Enlarged Partial Agreement on Sport
EU	European Union
FIFA	International Federation of Association Football
ILO	International Labour Organisation
LCDs	Least Developed Countries
OECD	Organisation for Economic Cooperation and Development
MFA	Malta Football Association
NAs	National Associations
NGO	Non-Governmental Organisation
SMEs	Medium-sized Enterprises
UEFA	Union des Associations Européennes de Football
UDHR	Universal Declaration of Human Rights
UN	United Nations
UNGP	UN Guiding Principles on Business and Human Rights

Executive Summary

- This report provides a thorough analysis of survey research exploring how UEFA Member Associations perceive, promote and protect human rights. It is one of the first attempts ever to apply human rights principles to football federations, thus representing a significant step forward in enhancing understanding of human rights in football.
- A survey composed of 28 questions was sent to all 55 National Associations in Europe: **41 of which responded (response rate of 74.5%)**.
- The survey intended to explore Football National Associations' (NAs) human rights formal commitment and governance; their practices towards respecting and promoting human rights; possible human rights due diligence and grievance mechanisms set up by Football National Associations; their motivation for engaging in human rights activities; the main challenges associated with human rights activities.
- NAs consider football as a powerful means to strengthen human rights respect; moreover they are aware of having a broader social responsibility in promoting human rights besides organising and promoting football and making profits.
- In terms of human rights governance, a remarkable high rate of NAs not only has a formal commitment to human rights (either a clause in the Association's Statute or a Code of Ethics), but also takes human rights into account when engaging in business with third parties (supply chains, suppliers, other associates or governments), selecting sponsors and deciding on where to host a tournament.
- The large majority of NAs are involved in a number of human rights activities. **The most recurrent issues are: the fight against any form of discrimination** (especially racism and homophobia); **the promotion of the concept of "integrity"** (i.e. anti-doping policies and the fight against illegal betting); **the promotion of human rights of vulnerable and specific groups** (such as: women, people with disabilities, and children).
- The creation of partnerships appears to be the prominent mechanism adopted by NAs to promote human rights, drawing on the knowledge and expertise of actors already experienced in carrying out human rights-related activities, such as UEFA, NGOs, local/national institutions, and schools/universities.

- Despite this general positive attitude, NAs remain rather cautious to assume a more demanding engagement in terms of human rights promotion. Indeed, less than 20% of NAs has a formal and specific human rights policy (which is more demanding both in terms of dedicated staff and budget), and regularly inserts a clause on human rights within contractual agreements with sponsors and third parties.
- When checked against the standards outlined in the UN Guiding Principles on Business and Human Rights, additional institutional and operational gaps in terms of human rights promotion highlighted by the survey are: the lack of specific staff working on human rights; the lack of regular training on human rights to NAs' personnel; the lack of a specific budget allocated on human rights; the sporadic use of due diligence mechanisms (especially external communication of human rights activities and human rights monitoring).
- **However the survey suggests that many NAs are aware of the pressures to engage in human rights and are attempting to further formalise and institutionalise their commitment.**
- There are a number of significant differences between large and small NAs, especially in terms of: specific human rights budget allocation; investing in personnel specifically working on human rights; the delivery of human rights training to NAs' staff; the consideration of human rights as an *essential requirement* in selecting sponsors.
- Embedding a human rights culture into the NA; measuring and quantifying the benefits of human rights activities; and resource constraints are the key obstacles and challenges faced by NAs in promoting human rights activities. These challenges affect almost all NAs, regardless of their size.

The report finally contains recommendations on how to enhance a framework on human rights promotion within football.

Introduction

As with any other human activity, sport is governed by human rights
UN Human Rights Council, 2015

Human rights are rights inherent to all individuals.

As such they became the highest recognition of rights enshrined for the first time in 1948 in the Universal Declaration of Human Rights.

Their universality, interdependence, inalienability and indivisibility have made them the cornerstone of the current global order. Over the years, sport has been recognised both as a human right as such and as a tool of paramount importance to foster those inalienable rights (UN Human Rights Council 2015). Indeed, in 1978, for the first time a right-based document recognised sport as a “fundamental right for all” (UNESCO 1978). Sport has a universal nature, in exactly the same way as any human right.

The importance given to this issue has been recently underlined by the revision made to the UNESCO International Charter for Physical Education, Physical Activity and Sport, in order to better highlight the essential positive impact that sport can have on societies¹.

The United Nations has always held the societal role of sport in high regard. As a result, the General Assembly marked this approach by proclaiming 2005 the International Year for Sport and Physical Education (UN General Assembly 2003). The strategy was aimed at reinforcing sport as an instrument of education, health, development and peace. Furthermore, in 2013 the UN General Assembly established April 6th as the International Day of Sport for Development (UN General Assembly 2013) and the following year the UN Secretary General drafted a report on the matter (UN General Assembly 2014).

On the one hand, the UN has acknowledged that, in addition to the contribution that sport can give to the economic and social progress of societies, it is also a way to overcome differences among persons based on race, religion and gender thanks to its in-built principles of tolerance and respect. On the other hand, it has underlined that its role in the promotion of human rights depends on the way it is used, and sports related business are run (UN Office of the High Commissioner for Human Rights 2011).

¹ Art. 9.3 states that: *Physical Education, physical activity and sport can serve as a powerful tool to prevent the universal phenomenon of gender-based violence by addressing its root causes, especially gender inequality, harmful social norms and gender stereotypes.*

Since football is the most widely practised and watched sport around the globe², this academic research focused on its role with regard to human rights respect, enhancement and protection.

The spotlight was set on European football, looking at UEFA's 55 member associations. Building on the recommendation made by the Human Rights Council of drafting a framework for “sport and human rights”, this study endeavoured to develop it for “football and human rights”. The core topic of the research, indeed, was human rights-related policies and practices carried out by UEFA national associations.

In particular, the research has been guided by the following three main questions:

1. Why should football business enterprises care about human rights and social responsibility?

Firstly, the survey sought to understand to what extent internationally-recognised human rights principles and norms shape the agenda of UEFA national associations. It analysed the positive impact they can make on their organisations by promoting and respecting human rights and the side effects and risks undertaken by infringing or not engaging in human-rights-related activities.

2. What are the main human rights areas of intervention? An external and internal approach.

Starting from a selected list of human rights issues - the fight against racism, empowerment of women, migrants/refugees social inclusion, access to sport of persons with disabilities, international development and peace building - a map of the main areas of intervention chosen by the organisations has been drawn up.

This map has a double perspective.

On the one hand, it looks at both the organisation policies in support of those rights towards people residing in the organisation’s country of establishment and towards the people of third countries. On the other hand, it investigates whether respect of human rights is entrenched in their business activities according to the UN Guiding Principle on Business and Human Rights (UN Human Rights Council 2011). The query is: is there a human rights clause?

² Biggest Global Sports, A statistics-based analysis of the world's most popular sports, available from www.biggestglobalsports.com.

3. Are there successful stories of grassroots approaches that can be disseminated as good practices? Is it possible to draft a framework of football and human rights?

Accordingly, the report is structured as follows.

Section 1 identifies the theoretical frameworks the research is based on: in particular, section 1.1 clarifies the existing interconnections between sport, football and human rights; sections 1.2, by contrast, is more focused on the two current leading approaches that inspired the research methods, that is Corporate Social Responsibility (CSR) and Business and Human Rights (BHR).

Section 2 highlights the research methods, including a thorough explanation of the four consecutive phases of questionnaire development, data collection, data analysis and dissemination event. Section 3 represents the core of the report, offering a comparative analysis of Football National Associations' behaviour in terms of human rights commitment, based on the results of the online survey carried out between December and January.

Moreover, in order to broaden the scope of the responses and also obtain a neutral view on the nexus between football and human rights activities, a survey among 30 civil society organisations has been carried out between the same period (reaching a response rate of 52%).

The results of this survey have been included in section 3 as a further investigation with regard to the issues considered either relevant to the study or comparable.

Finally, drawing on the survey findings and the framework provided by the UN Guiding Principles on Business and Human Rights, section 4 offers general conclusions, as well as a football and human rights framework on how NAs can possibly improve the effectiveness of their engagement towards the promotion and protection of human rights.

1. Theoretical framework

1.1 Sport, Football and Human Rights

There has been a rising interest in sport with regard to the International and European framework and mechanism on human rights.

At the international level, starting with the Universal Declaration on Human Rights which set out the right to “rest and leisure” (art. 24), the right to sport has been directly recognised in the UNESCO’s International Charter of Physical Education and Sport, the International Covenant on Economic, Social and Cultural Rights (art.12) and the Convention on the Rights of the Child (art.31).

Not only has the non-discrimination value with regard to sport in the Convention on the Elimination of All Forms of Discrimination against Women (art.10 and 13) and the International Convention Against Apartheid in Sport been noted, but also the right to fully participate in sport activities in the Convention on the Rights of Persons with Disabilities (art.30).

Furthermore, during the last decade, the UN Human Rights Council has drawn international attention towards the nexus existing between sport and human rights³, drafting in August 2015 the “Final report on the possibilities of using sport and the Olympic ideal to promote human rights and to strengthen universal respect for them” (UN Human Rights Council 2015).

The same reasoning applies for the European Union which through the Directorate General for Education and Culture at the EU Commission deals with all sporting issues, promoting sport through various programmes (such as the Erasmus +) and events (EU Sport Forum, European Week of Sport). The EU has been constantly investing in sport, by also developing a specific EU policy and a multiannual financial strategy.

Moreover, sport has been progressively dealt with even from the legal point of view by the European Court of Justice (ECJ) relying on the fact that sport implies also an economic activity⁴. Likewise the Council of Europe has shown a sound interest in sport, establishing the Enlarged Partial Agreement on Sport (EPAS) of which UEFA is part,

³ See, in particular, resolutions like: A/HRC/RES/27/8, A/HRC/27/58, A/HRC/RES/26/18, A/HRC/RES/24/1, A/HRC/20/11, A/HRC/RES/18/23, A/HRC/RES/13/27, A/HRC/13/20, A/HRC/RES/13/10.

⁴ Case C-415/93: Union Royale Belge des Sociétés de Football Association ASBL v Jean-Marc Bosman, 1995.

drafting the European Convention on Spectator Violence and the Anti-Doping Convention.

What is evident is that the perspective above mentioned has a general focus, namely sport, within which one can apply football matters.

Looking at the specific literature it is possible to narrow it down to the particular relation between football and human rights. Football, indeed, has an inherent transcendent capacity for bringing people together, thereby enhancing social cohesion, inclusion, and bringing about social change, especially among young people. In the last decade its role as vehicle for human rights enhancement has been fostered through strategies carried out by UEFA, its Member Associations and Football Clubs.

Yet, not only has this matter been the object of very little research from the academic standpoint, but also football's commitment to the human rights cause is often poorly broadcasted and thus rarely taken into consideration by the public.

On the contrary, football is often depicted by the general media as a source of social conflict, and it is associated with nationalism, sexism, racism and other strains of xenophobia.

Moreover, it must be highlighted that in the literature the topic has mainly followed a case-by-case approach, emphasising the connection between football and a specific right. For example, children's rights and education (Armstrong 2004; Pitchford et al. 2004; Brackenridge et al. 2004 and 2007), female empowerment and the fight against gender stereotypes (Renold 1997; Brady & Banu-Khan 2002; Hoffmann et al. 2006; Clark and Paechter 2007; Caudwell 2011), the empowerment of persons with disabilities (Atherton 2001; Macbeth 2008; Stride and Fitzgerald 2011), the fight against racism and xenophobia (Holland 1995; Moran 2000; McNamara 2000; Garland and Rowe 2001; King 2004), as well as football's role in promoting peacebuilding and reconciliation in divided societies (Armstrong 2002; Sugden and Wallis 2007; Rookwood 2008, Gasser & Levinsen 2004).

What is missing, creating a gap in the academic arena, is a comprehensive and comparative survey on how internationally-recognised human rights principles and norms are perceived, evaluated and promoted in European football: the proposed research aims at bridging this gap in the literature.

As a result, an in-depth analysis of the synergy between human rights and football is not only required but also necessary.

It is required because many efforts have been progressively carried out by football experts in order to implement football and human rights projects (for e.g. UEFA Foundation for Children, UEFA Football for All Campaign, Kick racism out of football: Play with me, implemented by Juventus and UNESCO, the FARE Network, Football for Peace International etc.).

Additionally, football has been increasingly used as a tool for peace building, economic development, social cohesion by International Organisations and NGOs (for e.g. Amnesty UK, Oxfam International⁵, Skillshare International⁶ and the UN) showing its key role in human rights promotion strategies.

Hence, a study on human rights and football is desirable, because for such a widespread phenomenon a social policy analysis is due in order to make the most out of it in terms of public awareness raising, best practices determination and effective and winning strategy planning.

All this would benefit football organisations in terms of both credibility and prestige at national and international level.

1.2 Building a bridge between Corporate Social Responsibility and Business and Human Rights approaches

The overall methodology of the research is inspired by the CSR approach, as well as by the standards set through the UN Guiding Principles on Business and Human Rights. Indeed, even though CSR and BHR can be considered as intertwined concepts - since both focus on companies engaging in responsible and socially beneficial activities - the display key differences and distinct identities based on their origins (Ramasastry 2015). In fact, CSR refers to companies taking responsibility for their impact on society, looking beyond shareholders and employees.

This concept has scholarly origins: it grew out of analysis of the role of the private sector in the aftermath of World War II. In particular, the publication of *The Social Responsibilities of the Businessman* by Howard Bowen in 1953 is widely regarded as the starting point of the debate about the role of business in society.

Two main consequences derive from CSR' origins in scholarly debates.

⁵ See [<https://www.oxfam.org/en/multimedia/video/2014-football-breaks-down-barriers-jordan-refugee-camp>].

⁶ See [<http://coachingforhope.org/>].

Despite CSR at its core can be described as the ethical commitment of the enterprise and its responsibility to care about the needs of the society, there are no commonly accepted definitions of CSR (Bradish, Mallen and Wolff 2013, p.67).

For instance, the EU defines CSR as “a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis” (European Commission 2001, p. 6).

While originally, CSR focused on charitable and philanthropic activities, more recently it has evolved into a strategic tool for organizations to protect their reputation, develop brand loyalty and foster competitive advantage (Dean 2003; Porter and Kramer 2006).

In general, CSR might relate to different types of activity, including: workforce activities (e.g. fair remuneration), supply chain activities, community activities (e.g. sponsoring social causes, financial donations, employee volunteering) and environmental activities (Blowfield and Murray 2008; Babiak and Wolfe 2013).

According to Walters and Tacon (2011, p. 11), this demonstrates that “there is no one overarching framework, nor set of guidelines; CSR implementation within the business context requires a tailor-made approach”.

Secondly, CSR focuses first and foremost on corporate voluntarism: companies are encouraged to engage in social activities especially because it is regarded as a way to add value to their business (Walker, Heere and Kim 2013).

Recent academic analyses managed to show a shift from normative justifications for implementing CSR to more instrumental, performance-oriented motivations (Lindgreen and Swaen 2010). In this sense, CSR may encompass some aspects of human rights, but its main focus remains broader and not as explicit about human rights as it could be a final goal (Detomasi 2008).

As far as the relation between sport in general (football in particular) and CSR is concerned, it has been explored by the literature only recently. Indeed, over the last few decades many sport organizations have, started to engage in various CSR actions, including philanthropy, community involvement, youth educational and health activities.

In addition to the above mentioned survey research carried out in 2011 by Walters and Tacon on football CSR, another prominent example is represented by the work of Smith and Westerbeek (2007), who showed that sport offers a particularly appropriate context for CSR due to seven key features: sport’s mass media distribution and communication power; youth appeal; positive health impacts; the social interaction that sport activities

offer; an increasing environmental and sustainability awareness; the promotion of cultural understanding and integration; and the immediate gratification benefits offered by sport activities, in terms of fun and satisfaction.

UEFA itself has developed a social responsibility portfolio, whose core directives are based on a selection of five-year strategic partnerships dealing with: antidiscrimination and diversity, social integration and reconciliation, active and healthy lifestyle, implementing football for everyone as well as funding a significant series of football foundations and charity programmes⁷.

BHR offers an alternative approach to CSR.

According to this second framework the goal is threefold: establishing a core obligation for companies to respect human rights wherever they operate; to do no harm; and when harm is caused, to provide a meaningful remedy to victims. Thus, a first distinct feature between CSR and BHR soon emerges: while the BHR approach focuses mainly on legal aspects, the CSR one investigates into moral, ethical and business considerations enhanced by CSR.

This is the result of a diverse origin of the two approaches.

Since the 1980s, BHR has been growing out of an NGOs and lawyers movement concerned with negative impacts of business activities and wanting to achieving remedy to harm caused by business. Whereas CSR stems from a debate over the role of companies as promoters of positive obligations (Ramasastry 2015).

Moreover, unlike CSR, BHR movement managed to promote an authoritative global framework for addressing the impact of any business activity on human rights, that is the UN Guiding Principles on Business and Human Rights (UNGPR), unanimously adopted by the UN Human Rights Council in 2011⁸.

In particular, Principle 12 of the UNGPR clearly states that the responsibility of business enterprises to respect human rights refers to internationally recognized human rights, understood, at a minimum, as those expressed in:

- the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); and

⁷ See: [<https://www.uefa.org/social-responsibility>].

⁸ See UN Human Rights Council Resolution A/HRC/17/4, 16 June 2011.

- the principles concerning fundamental rights set out in the ILO Declaration on Fundamental Principles and Rights at Work (dealing with four categories: freedom of association and the effective recognition of the right to collective bargaining; the elimination of forced or compulsory labour; the abolition of child labour; the elimination of discrimination in respect of employment and occupation).

Moreover, depending on the circumstances, business enterprises may need to consider additional standards. For instance, enterprises should respect human rights of individuals belonging to specific groups or populations that require particular attention, where they may have adverse human rights impacts on them.

In connection to this, UN instruments have further elaborated on the rights of indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; migrant workers and their families.

In situations of armed conflict, Principle 12 of the UNGP calls upon enterprises to respect the standards of international humanitarian law. Overall, this means that, even though they do not constitute a legally binding document per se, the UNGP are based on existing standards and practices for States and businesses both in international and domestic law.

At operational level, the UNGP are based on the “protect, respect and remedy” framework presented by the Special Representative of the UN Secretary-General, prof. John Ruggie, in 2008 (UN Human Rights Council 2008).

This three-pillar framework consists of: the State duty to *protect* human rights; the corporate responsibility to *respect* human rights; the need for greater access to remedy for victims of business-related abuse.

But what does “respecting” human rights exactly mean for corporates?

According to Principle 15 of the UNGP, in order to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including:

- a policy commitment to meet their responsibility to respect human rights;
- a human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights;
- processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.

However, unlike the literature on CSR, BHR has almost never been analysed in relation to sport. The only prominent exception in this sense is represented by a report drafted by prof. Ruggie for FIFA in 2016, where, drawing on the UNGP, he developed recommendations on what it means for **FIFA** to embed respect for human rights across its global operations (**Ruggie 2016**).

As a result, this research is ground-breaking also for its emphasis on this issue.

In theoretical terms, the added value of this research is to build a bridge between CSR and BHR. Indeed, both approaches have been adopted in the questionnaire sent to UEFA NAs.

The purpose was exploring, on the one hand, how they *promote* human rights within their activities (CSR); on the other hand, how they are committed to *protect* human rights (BHR).

The details on how the questionnaire has been developed according to this reasoning are outlined in the following section.

2. Research methods

Since this research has a clear cross-sectional design, and given the lack of previous studies in this field, a questionnaire survey was deemed the most appropriate method of data collection.

Indeed, this technique permitted the assessment and comparison of the reasoning behind UEFA member associations engagement in human rights-related activities, their main areas of intervention and the major obstacles faced, as well as the identification of possible good practices.

The methodology implied a four-step process, as delineated in the following sections.

2.1 Questionnaire development

As of July 2016, the research team (composed of the following persons: **Jacopo Tognon**, Lecturer and holder of the UEFA RGP; **Marianna Pavan** and **Andrea Cofelice**, junior researchers) has been meeting up several times in order to create the most accurate survey to investigate the research topic.

The task was carried out in steady contact with the UEFA Corporate Football and Social Responsibility sector in order to ensure that the questionnaire would meet as much as possible UEFA interests and concerns.

In order to develop the questionnaire, as a preliminary step a thorough review of the literature was carried out to identify the most relevant human rights standards for the purposes of this research, as well as how human rights have been assessed in previous survey researches on business and CSR.

The process began by identifying the main international instruments constituting the backbone of the questionnaire. These are: the Universal Declaration of Human Rights (1948); the International Covenant on Civil and Political Rights (1966); the International Covenant on Economic, Social and Cultural Rights (1966); the UN Convention Against Corruption (2003); the International Convention Against Doping in Sport (2005); the UN Global Compact (2005); the UN Guiding Principles on Business and Human Rights (2011); the OECD Guidelines for Multinational Enterprises (2011); and the General provision n. 3 of 2016 FIFA Statutes (2016).

In terms of the academic literature and tools developed by CSOs and international organisations to assess human rights and CSR in business activities, the works used to

develop the questionnaire are: Holmes (1976), Jenkins (2006); Turker (2009); Walters and Tacon (2011); Business Leaders Initiative on Human Rights (2012); European Commission (2015); Ruggie (2016); Corporate Human Rights Benchmark (2016).

After identifying the general issues to be included in the questionnaire, as a second step a fruitful discussion with the UEFA Corporate Football and Social Responsibility sector was initiated, in order to further tailor the questions to the needs and specific interests of the Union of European Football Association.

As a result of the discussion, and drawing on the above mentioned human rights standards, tools and academic works, the questionnaire was developed with a twofold aim.

First of all, it seeks to explore the extent to which NAs *respect human rights*. i.e. through human rights formal commitment and governance, due diligence and grievance mechanisms (see art. 15 of the UNGP).

Secondly, the questionnaire wants to assess whether and to what extent NAs implement their CSR through *human rights promotion*.

Indeed, sport in general, and football in particular, have been recognised as a tool of paramount importance to foster inalienable rights at all society levels.

What are, in this sense, the human rights practices implemented by football national associations? Why should national associations engage in human rights promotion?

Accordingly, the questionnaire is comprised of 28 questions organised in 5 core sections, plus an introductory background context and a final privacy section (see annex A and C for the full text).

It was purposely kept short and contains 27 closed-ended questions (including multiple-choice questions and scales) and only 1 open question (which was not compulsory) in order to maximise the response rate.

The structure of the questionnaire is as follows:

- *Background questions* (questions 1-4). The purpose is to analyse the data in a disaggregate manner. This way it will be possible to see if and how the answers change depending on the organisation size and turnover.
- *I. Human rights formal commitment and governance* (questions 5-11). This section assesses the football clubs formal commitment to respect human rights – which is a necessary but not sufficient tool - to develop human rights practices. In particular,

questions 5-7 deal with formal commitment and knowledge on human rights; questions 8-9 deal with personnel of the association dedicated to human rights; questions 10-11 deal with specific budget for human rights.

- *II. Respecting human rights: national associations' practices* (questions 12-15). On the one hand, this section investigates if and how national associations respect human rights, with reference to: business relationship with third parties, including supply chains, suppliers and associates (question 12), sponsors selection (question 13) and hosting football tournament (questions 14-15).
- *III. Corporate Social Responsibility via human rights promotion* (questions 16-22). This section analyses if and how national associations implement their CSR thanks to human rights promotion, taking into account three particular aspects: their perception on football and human rights interaction, linkage and risks (questions 16-18); human rights priorities in practice (question 19); typologies of human rights promotion practices (questions 20-22).
- *IV. Human rights due diligence and grievance mechanisms* (questions 23-24). This section evaluates the implementation of due diligence practices and the availability of grievance mechanisms by national associations. According to the UNGP principle 17 due diligence means “assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed”. Whereas grievance mechanisms indicates any formal or informal procedure through which a national association offers the possibility to sort out human rights concerns and/or alleged violations.
- *V. Motivation and challenges when engaging in human rights practices* (questions 25-26). This section aims at identifying why national football associations decide to carry out human rights practices, in addition to pin point the obstacles preventing from engaging in or reducing the impact of human rights practices. It is mainly based on Holmes (1976) and Jenkins (2006).
- *Privacy* (questions 27-28). This section aims at assuring NAs that their response would be kept confidential and anonymous.

The questionnaire was finalised in October and sent out on November, 10th 2016.

2.2 Data collection

This second step took place between December 2016 and January 2017.

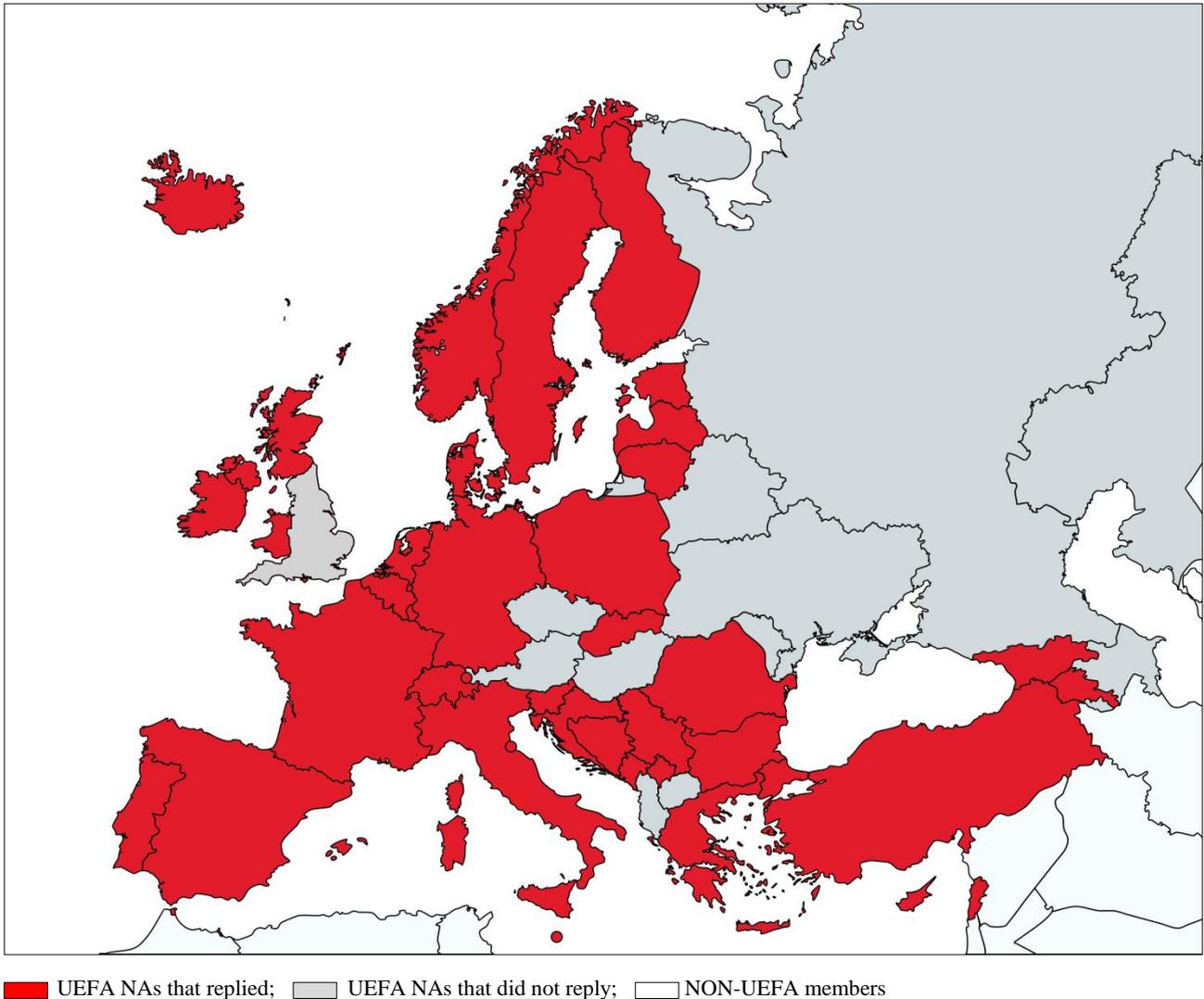
The survey was built through an online platform (*Survey Gizmo*) that offers the possibility to draft tailored questionnaires and collect and store all the data.

Since the beginning it was taken into account the issue of getting in contact with our recipients and establishing a steady interaction in order to increase the possibility of reaching a high response rate. As far as the National Associations Survey is concern a series of actions have been implemented:

- Creating a specific email google account: football4hr@gmail.com. Thanks to this each respondents has been able to easily contact the research team while compiling the questionnaire;
- Requesting UEFA to provide us with a list of direct contact of the Corporate Social Responsibility (CSR) experts of each National Association;
- Asking UEFA to support our research with an endorsement letter that would have been sent to the National Associations;
- Getting in contact with each recipient for the first time using a personalised email, where the project, its rationale and goals were presented. Many National Associations has been emailing back showing a sincere and deep interest in the matter;
- Sending a second email, containing the link to access the online survey and the relative instructions, setting the deadline of December 2016, 1st.
- Sending out a gentle reminder in January 2017.

2.3 Data analysis

As a result of the above mentioned strategy, the survey reached the extremely high rate of 74,5% response rate. Indeed, 41 out of 55 UEFA National Associations completed the questionnaire.



The data from the online questionnaire were processed through Excel and Stata, two software packages designed to enable statistical analysis.

The added value of the analysis is also given by a further investigation carried out with regard to a selected sample of Civil Society Organisations with the purpose of assessing their point of view on the role that football can play with regard to human rights respect and promotion.

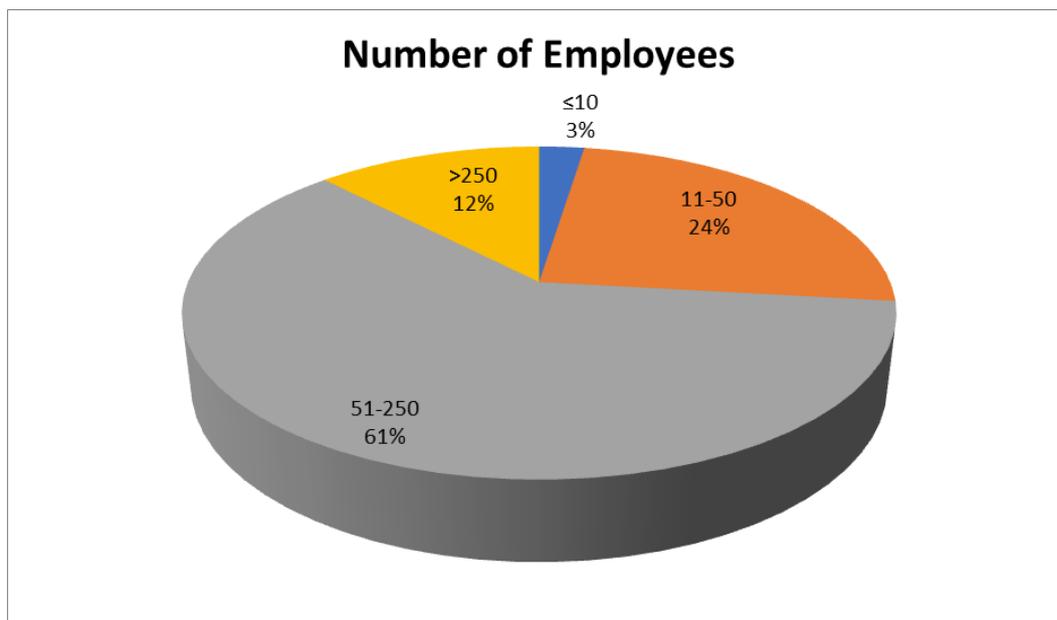
The results stemming from this additional survey, will be reported within chapter 3 as an external point of view on issues brought to the attention of the NAs.

Moreover in order to provide the investigation with a sound and exhaustive academic background a study trip, as previewed in the original budget form, was made to the EU Commission Library in January, 30-31 2017 in Brussels. This allowed the collection of as many academic papers as possible in order to carry out an in-depth analysis.

When analysing CSR and BHR related to sport in general and football in the case at stake, respondents are usually categorised according the size of the organisation in terms of number of employees and turnover.

With regard to the number of employees, the absolute majority of respondents (61%) belong to the medium-sized organisations (i.e. 51-250 employees); 24% are small organisations (11-50 employees); 3% are micro organisations (equal to or less than 10 employees); while only 12% of respondents have a number of employees exceeding 250.

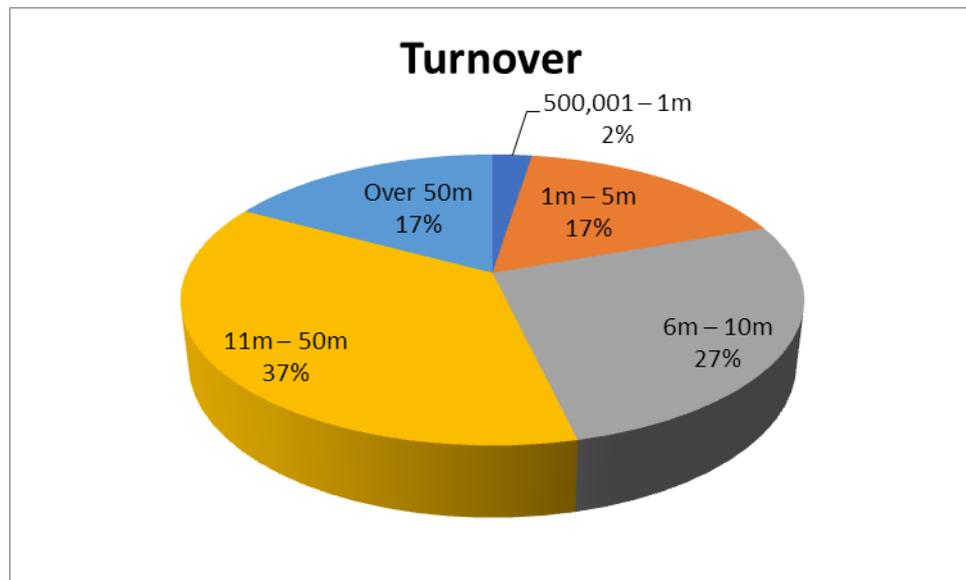
Figure 1 (N=41)



Whereas with regard to the organisation turnover the results show that the relative majority of National Associations (37%) sets around a medium-sized turnover (€ 11-50 million), followed by 27% with a small turnover (€ 6-10m); 19% with a micro turnover (less than € 5m), and only 17% with a large turnover (over €50m).

Hence, in the report NAs will be categorised as: large, medium, small and micro, depending on their turnover.

Figure 2 (N=41)



This means that the huge majority of European NAs can be considered as small and medium-sized enterprises (SMEs), according to the EU definition.

Indeed, the European Commission defines SMEs as firms with less than 250 employees and a turnover of less than 50m Euros⁹. In general, SMEs represent the main form of organisation in Europe, accounting for 99% of all enterprises¹⁰.

Accordingly, NAs clearly have the typical SMEs' features. Indeed, 88% of those responding to the survey have a number of employees not exceeding 250, while 83% have a turnover of less than €50m.

The following substantive analysis will be disaggregated according to the size of NAs: any difference between large and small NAs is reported where relevant. In this study, drawing on Walters and Tacon (2011) - who recorded a very strong correlation between turnover and the number of full-time employees - turnover will be the proxy for organizational size.

⁹ SME definition is contained in: European Commission, *Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises* (Doc. C(2003)1422).

¹⁰ http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition_en

2.4 Dissemination event in Malta National Stadium: “Where football meets human rights”:

Worth mentioning is also the event “Football For Human Rights Help Desk: Where football meets human rights”, organised in the Malta Football Association (MFA) premises on March, 7th 2017.

Indeed, the event was arranged in partnership with MFA, with the purpose of offering to the Maltese National Association the occasion to raise awareness on the nexus between football and human rights.

The audience was made of lawyers, MFA officials and Referees, Player’s Union, Clubs and Supporters representatives. It embodied the opportunity to discuss on the important role that football can play with regard to both human rights respect and promotion.

All the participants showed sincere interest in the matter and participated in the final discussion that raised some interesting issues.

Attendee firstly asked how CSR experts within NAs were identified and contacted.

This query clearly highlights the pivotal role UEFA played in supporting the research. Indeed, having a pool of CSR experts to directly send the survey to allowed time to be saved and the correct representatives to be referred to.

A further question was according to which principles human rights areas were chosen. This permitted to explain that human rights were selected according to the main human rights documents of soft and hard law, in order to be as thorough as possible.

Finally, a third question was whether the NAs staff is generally trained to deal with human rights issues, demonstrating that the need for human rights training is felt by people working in the football context. This question was envisaged also by the questionnaire, whose results showed a lack of specific training in the matter.

An event like this demonstrates that human rights are important to professionals working in the football environment and that occasions to discuss about human rights in relation to football if organized within the NAs could be very useful.

Indeed, they can represent the chance to on the one hand raise awareness on the topic among stakeholders and for scholars, on the other hand gain first-hand experience on the matter from the NAs.

Malta Football Association , March 7, 2017
Millennium Stand (Floor 2) |National Stadium|Ta' Qali ATD4000



3. Football National Association and Human Rights

This sections offers a thorough analysis of Football National Associations' behaviour in terms of human rights commitment and practice, based on the results of the online survey.

For reasons of clarity, this section reflects the structure of the questionnaire, as detailed in section 2.1.

Data are presented both in aggregate and, where relevant, disaggregate way, in order to grasp when and how NAs' size (in terms of turnover) may influence human rights-related aspects.

Moreover, if pertinent, data from the CSOs questionnaire are also introduced, aiming at either reinforcing NAs' perceptions and trends, or highlighting divergent views between the two groups of actors.

3.1 Human rights formal commitments and governance

First and foremost the ability to address human rights can be determined by the extent to which they are embedded within the culture and institutional structures of NAs.

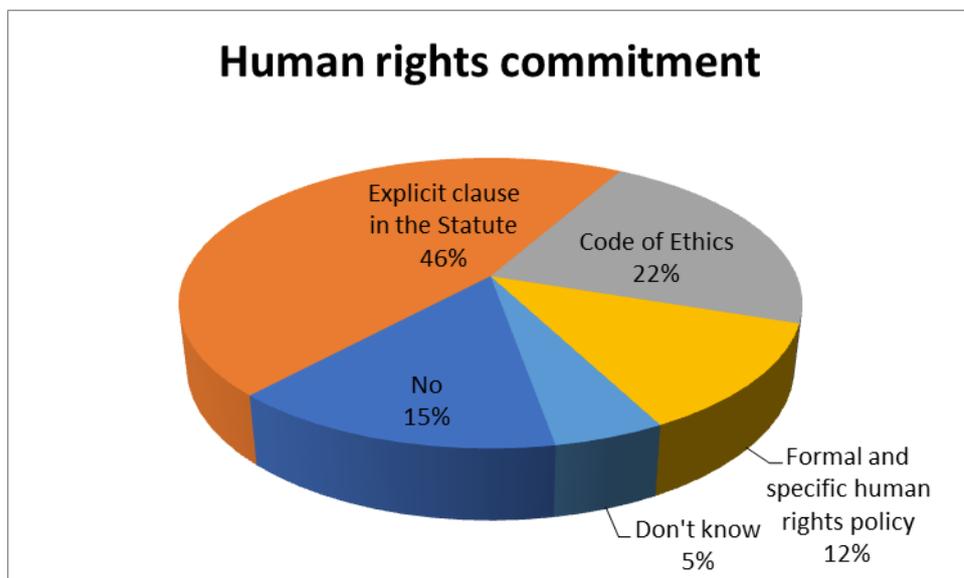
Accordingly, this section intends to explore these specific human rights-related aspects.

Firstly, the survey revealed that a remarkable high rate of National Associations (equal to 80%) have a formal commitment to human rights.

Precisely, for 68% of them the formal commitment is envisaged by either a clause in the Association's Statute or by a Code of Ethics.

However, only 12% has a formal and specific human rights policy. Indeed, implementing a concrete policy it is clearly more demanding both in terms of dedicated staff and budget.

Figure 3 (N=41)



The top 10 human rights areas covered by the National Associations various types of formal commitment are depicted in figure 4.

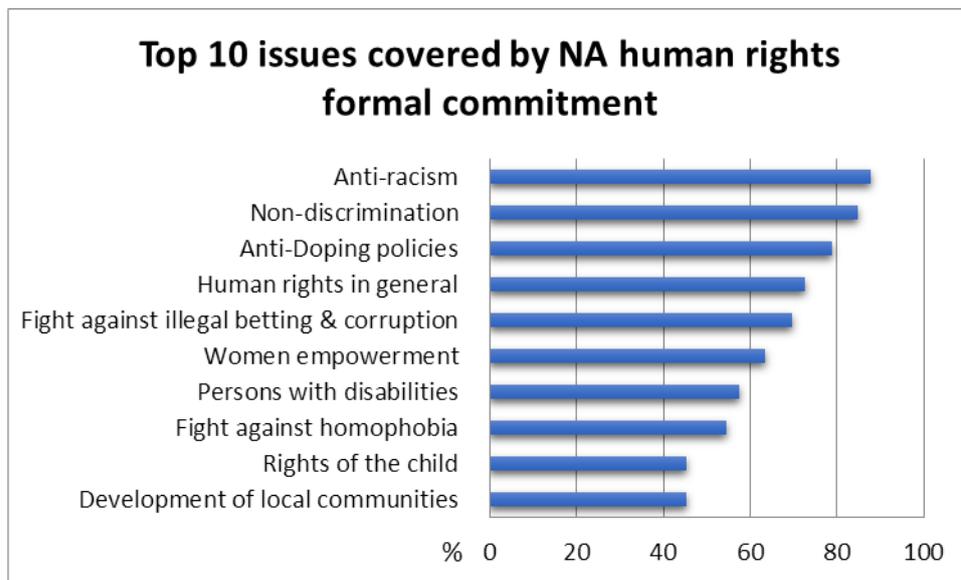
It should be highlighted that among these areas **the most recurrent issue is non-discrimination declined in all its forms: racism** (87,9% of respondents), **homophobia** (54,5%) and any **other type of discrimination** according to art. 2 of the UDHR (84,8%).

Another important cluster area is represented by vulnerable and specific groups, such as: women (63,6%), people with disabilities (57,6%) and children (45,5%).

Furthermore, numerous National Associations deem fundamental taking into consideration anti-doping policies (78,8%) and the fight against illegal betting (69,7%) which evidently underline the importance given to integrity.

Finally, besides the top 10, other areas of interest – although in lower percentage – are: right to health (36.4%), right to education (27.3%), peace building/ reconciliation (27.3%), migrants and/or refugees integration (21.2%), environmental policies (21.2%), aid to least developed countries - LDCs (12.1%)

Figure 4 (N=41)



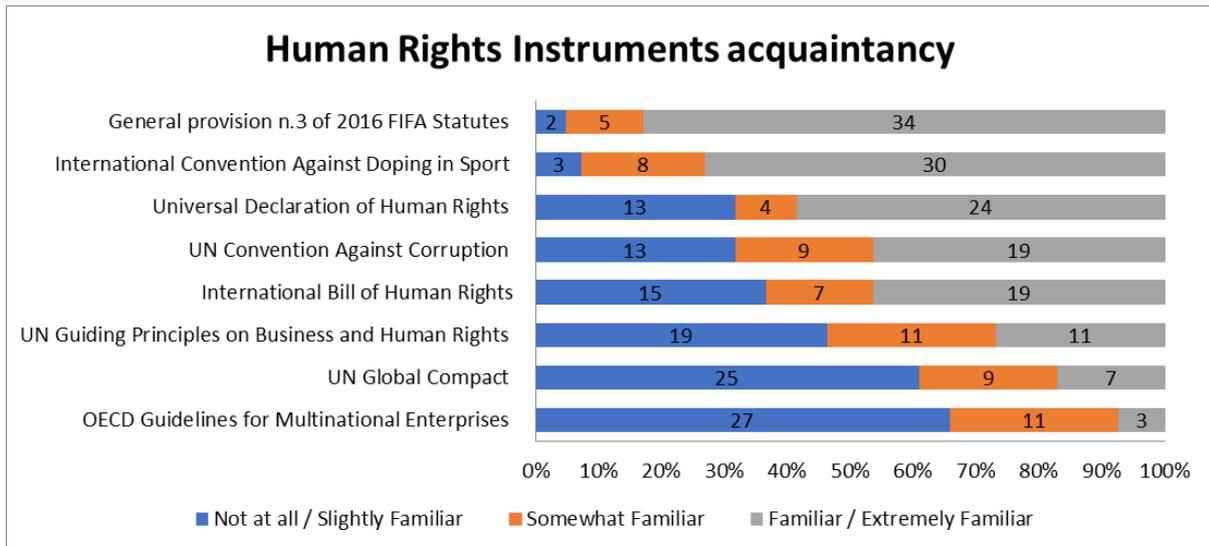
Legend: the overall sum is over 100% since the question included multiple choices.

Secondly, it is interesting to note that National Associations are particularly familiar with instruments either specifically dealing with sports matters (like doping and corruption) or adopted and disseminated by the organization that represents them at global level, i.e. FIFA.

Another set of documents that they perceived to be fairly familiar with are the general human rights instruments, namely: the UDHR and the International Bill of Human Rights.

Inversely, it is evident the general low level of knowledge with reference to the tools dealing with CSR and BHR, that are: OECD Guidelines for Multinational Enterprises, the UN Global Compact and the UNGP.

Figure 5 (N=41)



Legend: the numbers in the bars are referred to the numbers of responses received

Thirdly, this survey finds that even though human rights are considered significantly important, only 46% of NAs has a staff dealing with human rights (7% of which has a designated office or committee).

By contrary, 49% responded there is no specific staff working on human rights practices. Nevertheless, this percentage drop to 14% if considering NAs with a turnover of more than 50m. This means that the size of the NAs deeply affect their capabilities of investing in personnel working on human rights.

Indeed, if the sample considers only the NAs with a turnover exceeding €50m, 71,5% of them have either a specific staff dealing with human rights matter or even a designated office/committee.

In addition to this, merely 1 out 5 National Associations regularly offer a training on human rights to their personnel; 27% of them provide the staff with an occasional training on the matter, while almost 40% either do not offer a human rights training or rarely does it.

As in the previous question, the size of NAs has an impact on their possibility of offering human rights related activities.

In this specific case, when looking at the delivery of human rights training within large NAs, the percentage that rarely does that is merely 14%, furthermore none of them never offer them.

Furthermore when considering only micro NAs, they only occasionally or rarely carry out human rights trainings (37,5%) and never does it on a regular basis.

Figure 6 (N=41)

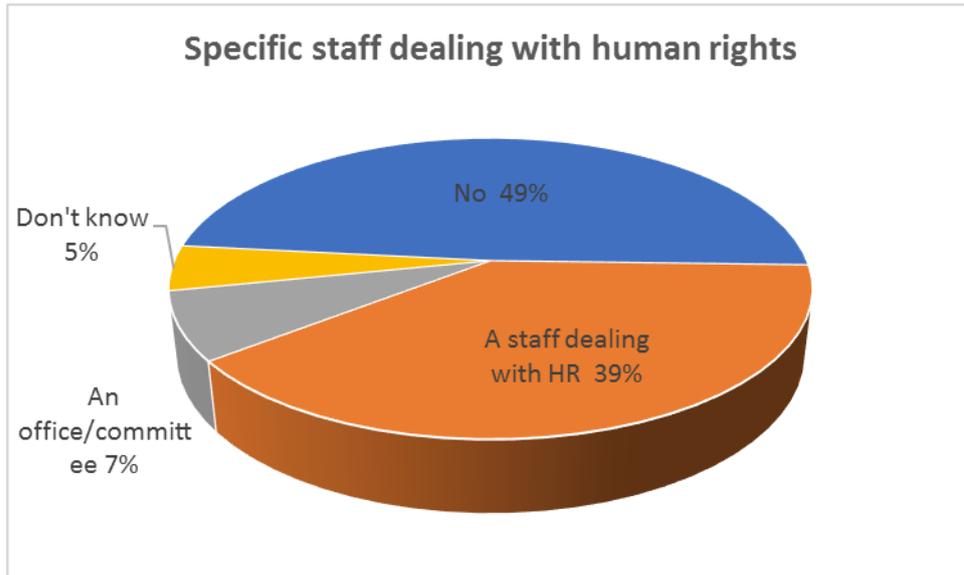
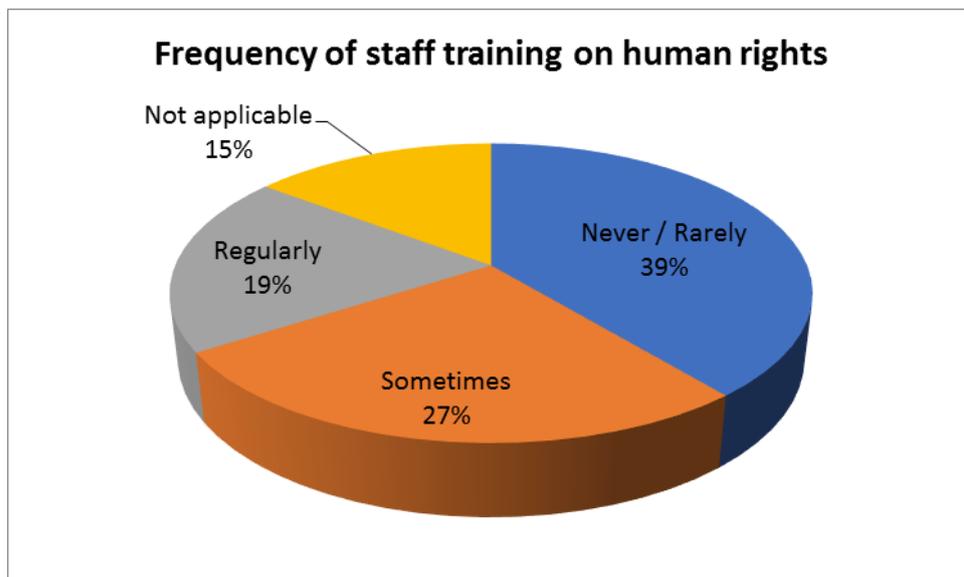


Figure 7 (N=41)



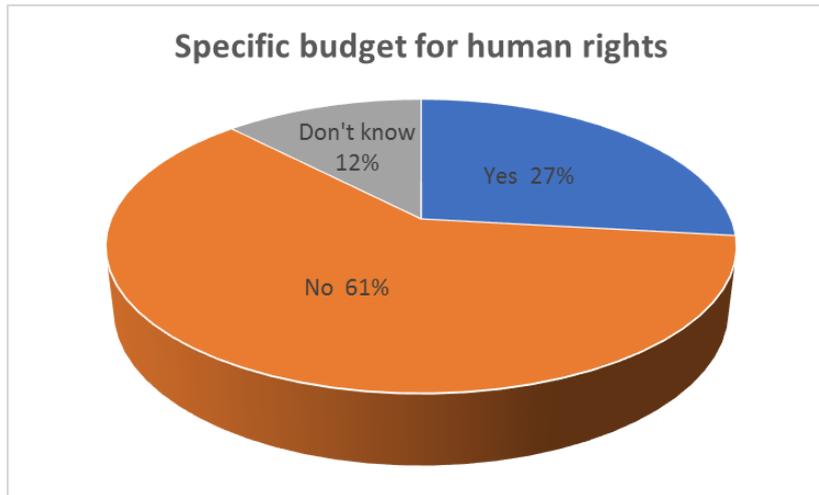
A further critical issue is that even when considering the budget allocated on human rights practices, more than 60% of NAs do not have one.

In fact, only slightly more than 1 out of 4 NAs has a budget for human rights (26,8%).

Noteworthy is that those percentages are drastically different if analysed depending on the NAs turnover.

57% of large NAs has a specific budget for human rights practices, while only 12% of micro NAs has one.

Figure 8 (N=41)

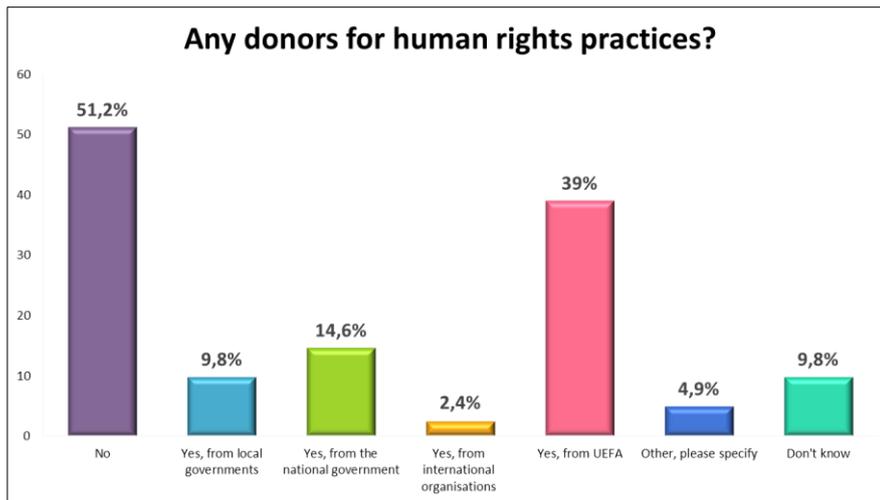


The shortage of budget allocated on human rights corresponds to a shortage of donors as well. Indeed, more than half of NAs asserted of receiving no funding from any donor. Among those that receive funds the by far major donor is UEFA (39% of respondents), followed by National Governments (14,6% of respondents) and Local Governments (9,8% of respondents). While only 2,4% relies on funds from International Organisations (UN, EU and Council of Europe).

Of paramount importance is that also CSOs sample answered that UEFA is the main donor for human projects employing football as a tool (64,3%).

Other major donors are Local Governments (57,1%), National Governments (50%) and private donors (42,9%). Of key interest is that for the 50% of CSOs, large-scale International Organisations are donors, representing the most evident difference compared to the NAs funding system

Figure 9 (N=41)



Legend: the overall sum is over 100% since the question included multiple choices

3.2 Respecting human rights: national associations' practices

Though the survey it was also investigated if and how Football National Associations respect human rights, with reference to three specific issues: business relationship with third parties (supply chains, suppliers and associates), sponsors selection and football tournaments venue choice.

The bar graph 10 highlights that overall NAs care about human rights when engaging in business with third parties (supply chains, suppliers, other associates or governments). More specifically almost $\frac{3}{4}$ of NAs takes into account human rights when either engaging or terminating business relationships: 56% regularly, further to 17% occasionally.

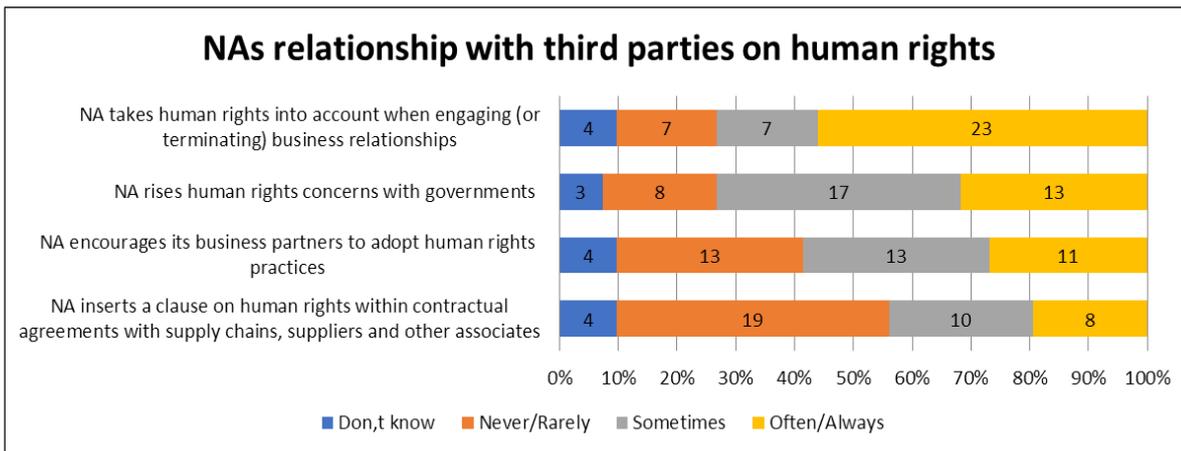
Equal overall percentage of NAs (73,2%) rises human rights concerns with governments when appropriate. In this case, 31,7 % regularly and 41,5% occasionally. Finally, almost 60% of NAs encourage their business partners to adopt human rights practices: 26,8% regularly, further to 31,7% occasionally.

Despite this positive attitude it should be emphasised that NAs are more cautious to assume a more demanding engagement in terms of human rights promotion.

Indeed, only 19,5% regularly inserts a clause on human rights within contractual agreements with supply chains, suppliers and other associates.

An additional 24,4% does it occasionally, whereas 46% either rarely do it or do not do it at all.

Figure 10 (N=41)



Legend: the numbers in the bars are referred to the numbers of responses received

Applying the same reasoning used above, also with regard to both sponsors selection and the decision on where to host a tournament, human rights are generally taken in due consideration.

With reference to sponsors, 2/3 of NAs include human rights in the selection process, while only 22% do not consider them.

Yet, as in the previous analysis when the consideration implies a further formal engagement, the percentage of NAs taking as an essential requirement the consideration of human rights is reduced to 15%.

Indeed, 51% consider them but only as one of many aspects to be taken into consideration. The framework changes when taking into account only large NAs, showing that 57% of them considers human rights as an essential requirement and only 29% as one of the aspects to be regarded.

In addition, none of the large NAs totally disregard human rights.

In relation to the choice of where to host a tournament, more than half of NAs take human rights into account. **However, only 7% deems it as an essential requirement.** In this case, no significant difference emerges according to the NAs size.

Diverse is the perception of CSOs which as much as 50% believe that NAs do not take human rights into consideration when selecting sponsors instead.

The same occurs when questioned about the choice of where NAs host a tournament: 50% states that NAs do not consider human rights in order to make the venue choice.

A more in depth analysis regarding the choice of tournaments venue, shows that human rights areas taken into consideration in the decision process are: anti-discrimination (95,5%), rights of persons with disabilities (86,4%), corruption (86,4%), women rights (81,8%), rights of the child (72,7%), environmental standards (68,2%), rights of migrants and refugees (50%).¹¹

Figure 11 (N=41)

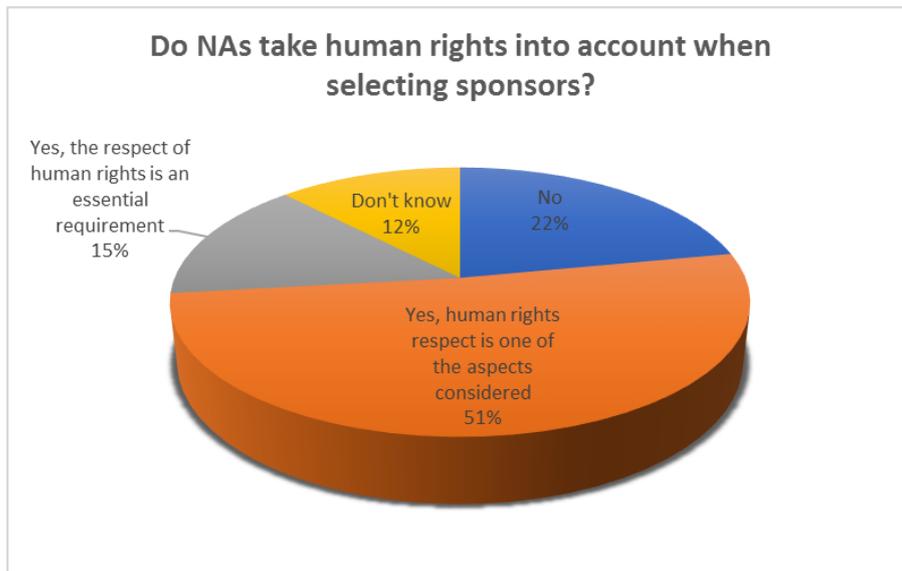
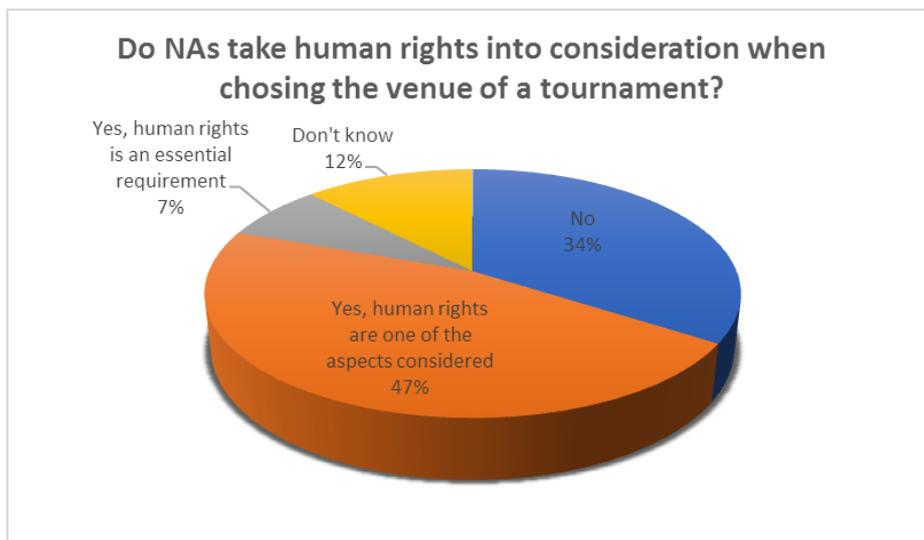


Figure 12 (N=41)



¹¹ Note that it was a multiple choice question

3.3 Promoting human rights: national associations' practices

The survey was also used to analyse if and how NAs implement their CSR thanks to human rights promotion, **taking into account three particular aspects: national football association perception on football and human rights interaction, linkage and risks; human rights priorities in practice; human rights promotion practices.**

With reference to NAs perception on football and human rights interaction, linkage and risks, more than 70% of NAs assert that football vis-à-vis other sport activities has an added value, in conveying core values such as: fairness, teambuilding, equality, discipline, inclusion, perseverance and respect. They argue in favour of this claim stressing some peculiar football dimensions:

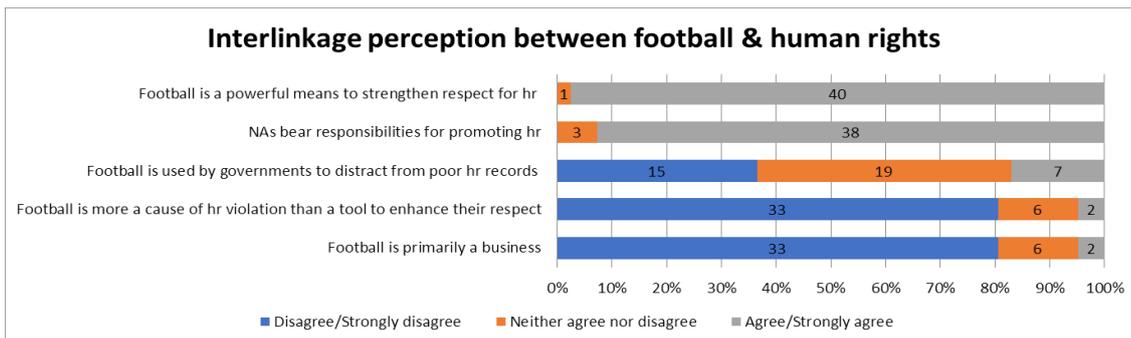
- popularity (in terms of fans, players, stakeholders, institutional actors);
- media coverage;
- global impact (more Country Members in FIFA than in the UN);
- accessible, easily understandable, easy to play and emotionally engaging;
- overcoming differences (“participants are often from different backgrounds, so football unites communities”).

The figure offers a very clear picture of the overwhelmingly positive perception that NAs have on the role that football plays as instrument of human rights promotion.

Interesting to note is that more than 90% of NAs not only considers football as a powerful means to strengthen human rights respect, but also that NAs perceive to bear responsibilities in promoting human rights.

The same awareness is shared by CSOs which unanimously sees the full potential of football in becoming a means of human rights enhancement. In addition, NAs bear themselves as a catalyst of human rights promotion. According to the same reasoning the two more controversial assertions, implying that football is either merely a business or a cause of human rights violation are largely rejected by 80% of NAs.

Figure 13 (N=41)



When asked to pick and rank 3 top human rights risks associated with football and NAs activities (from a given list of 12 options), NAs selection led to the following ranking: first place: racism; second place: corruption; and third one: discrimination against minorities.

What is remarkably interesting is that also accordingly to CSOs the three top human rights risks are first: racism; second: discrimination against minorities and third corruption.

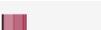
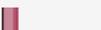
Middle positions are taken by the risks based on other forms of discriminations which are the ones based on gender, sexual orientation and disability, in addition to doping.

At the bottom of the ranking displayed in figure 14 there are two risks connected to minors: children exploitation and illegal international transfers.

On the contrary, CSOs position those risks related to children in the middle of the ranking.

Finally, being selected only once each, “land acquisition in the framework of tournaments” and “players’ access to remedy” are not displayed on the figure.

Figure 14 (N=41)

Item	Overall Rank	Rank Distribution	Score	No. of Rankings
Racism	1		73	30
Corruption	2		55	27
Discrimination against ethnic, national, linguistic or religious minorities	3		31	16
Gender based discrimination	4		23	13
Homophobia	5		20	13
Doping	6		12	7
Discrimination based on disability	7		10	5
Child exploitation	8		8	5
Illegal international transfer of minors (art. 19 RSTP FIFA)	9		6	3

Legend: each respondent was asked to pick only 3 top human risk and put them in order of importance. The “score” column reports the sum of points given to each risk according to the ranking: 1st choice= 3 points, 2nd choice= 2 points, 3rd choice= 1 point. For eg. Racism score is 73 because it was selected as 1st choice 18 times; as 2nd choice 7 times and as 3rd choice 5 times. Hence, (18x3) + (7x2) + (5x1)= 73.

The “No. of Rankings” column simply reports the number of times that each risk was selected among the top three. For eg. racism was selected as one of the three top risks 30 times, corruption 27 times, discrimination against minorities 16 times and so on.

The first three human rights areas considered essential by NAs when implementing activities are: combating racial discrimination, fight against corruption and doping.

In general are also deemed medium-high priorities women rights and the rights of persons with disabilities. In contrast, the least considered topics are promoting development in LDCs countries, fostering peace building and reconciliation and supporting migrants and refugees integration.

It is noteworthy that CSOs when asked which human rights areas they engage in using football as a tool, combating racial discrimination and the general non-discrimination principal (pursuant to art. 2 UDHR) result as top priorities.

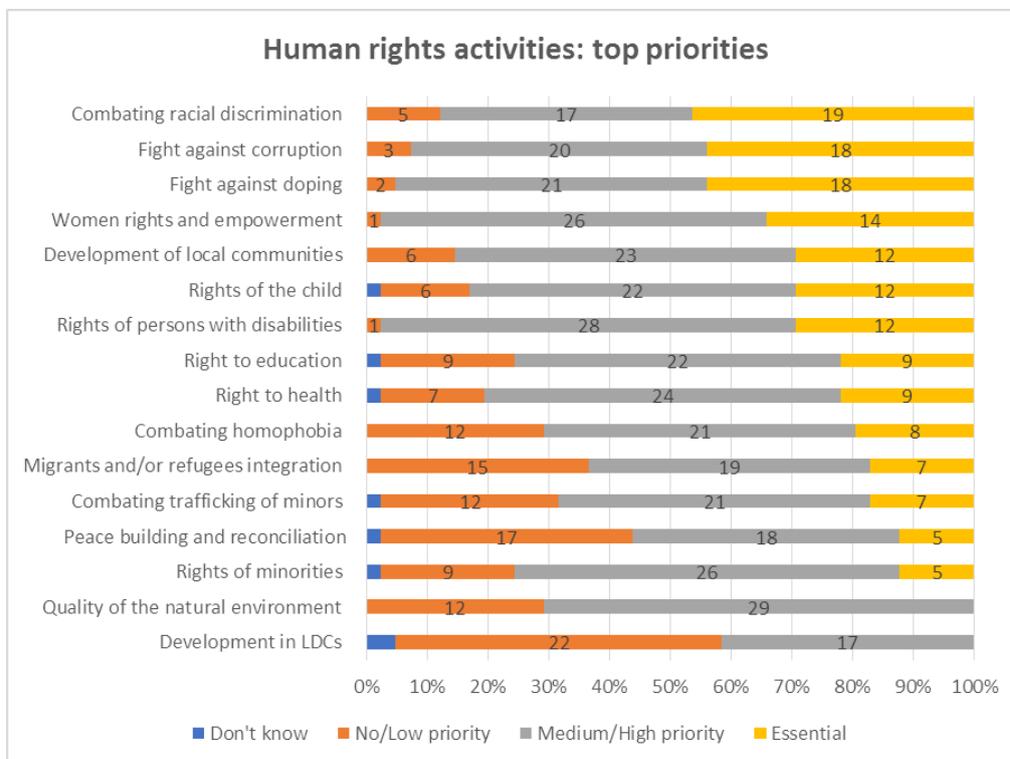
Hence, both NAs and the Civil Society Organisations have the same perception about the prominence of non-discrimination.

Women empowerment is also considered one of the preferred human right field to deal with using football (85,7%).

Inversely, what is strikingly different is the importance of football in migrants/refugees integration and in peace building promotion.

Indeed, while NAs perceive those aims as minor, as much as 64,3% of CSOs carry out practices using football to reach those goals.

Figure 15 (N=41)



An interesting question is: how do NAs make real their human rights commitment?

Above all only slightly more than 40% of them directly implement human rights projects.

It should be recognized that NAs have a general responsibility to oversee the organization of football within a country and, as a consequence, they may not directly be involved in human rights initiatives “on the ground” in the same way that, for instance, football clubs have the potential to do so (Walters and Tacon 2011).

However, NAs may display a more robust tendency to participate in human rights project launched by third parties, and/or to oversee activities that are delivered through their local structures, the professional leagues and clubs.

In fact, figure 16 shows that most of them join human rights project carried out by third parties like UEFA (71%), NGOs (63%), local/national institutions (56%) and schools/universities (44%). By contrary, only 17% of NAs get involved in project launched by International Institutions such as: the UN, the EU and the CoE.

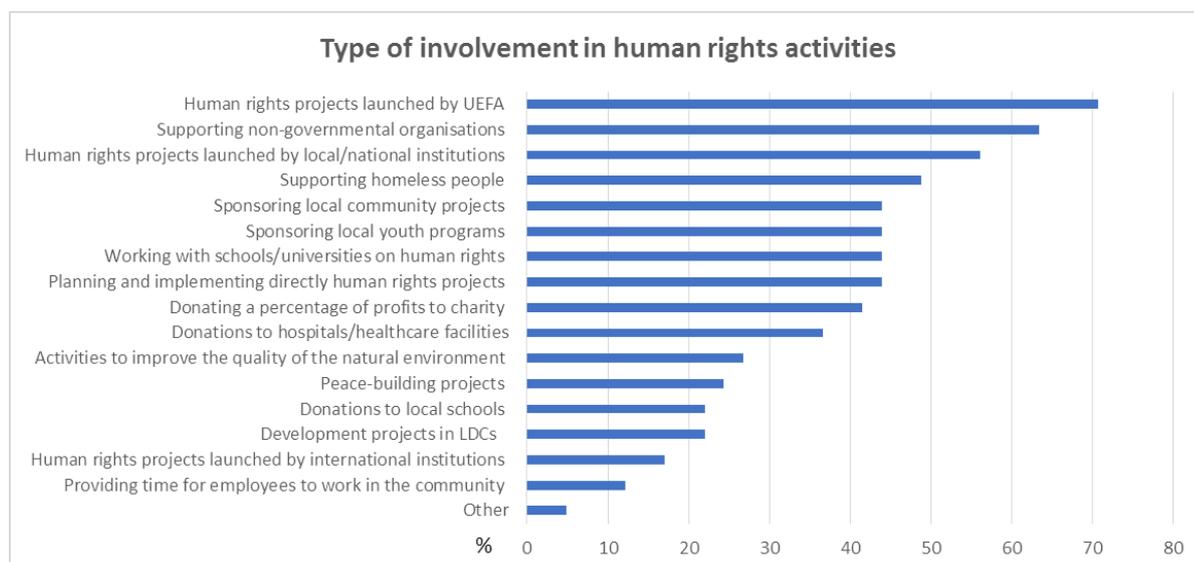
Thus, the creation of partnerships appears to be the prominent mechanism adopted by NAs to promote human rights, drawing on the knowledge and expertise of actors already experienced in carrying out human rights-related activities.

The typical duration for the majority of human rights projects where NAs are involved is of 0-5 years. Another way of participating in human rights projects used by NAs is sponsoring local programmes through financial aid.

For example supporting homeless people (49%), local community or youth projects (44%), donating to charities (41%) or to hospitals and health care facilities (37%).

There is no significant difference emerging according to the NAs size.

Figure 16 (N=41)



3.4 Human rights due diligence and grievance mechanisms

How do NAs externally communicate their engagement in human rights?

As shown in the graph below, due diligence mechanisms are generally not used with regularity.

The external communication of human rights activities is either never or rarely carried out by 42% of NAs and 28% does it only occasionally.

This happens despite the fact that it would not be a particularly challenging mechanism, since any NA has a communication department which could disseminate the human rights activities.

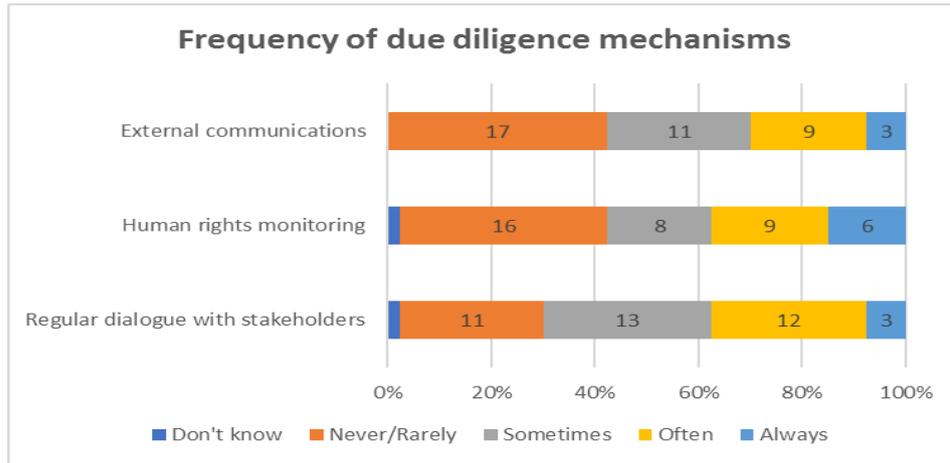
There might be two possible explanations for this finding: **a)** human rights are not high on the list of priorities of external communication of NAs, whose main responsibility remains that of organising and promoting football at all levels; **b)** NAs do not see any immediate benefit from carrying out such external communication activities.

These possible justifications are consistent with more general findings in CSR and sport literature. Indeed, Anagnostopoulos (2013) argues that these external communication issues are associated with resources (staffing), expertise (training) and priorities (cross-departmental collaboration).

Additionally, 40% of NAs either never or rarely implement human rights monitoring mechanisms, plus 20% does it only occasionally. This was more expected due to the fact that human right monitoring requires time, budget and specific skills to be regularly performed.

The dialogue with stakeholders is considered with more attention. Indeed, only 27% of NAs does not directly interact on human rights issues with interested parties. This suggests that human rights tend to be perceived as a relatively relevant aspect when engaging with stakeholders.

Figure 17 (N=40)



Regardless the relative low level of human rights outreach, the majority of NAs (57%) deem important to grant both individuals and communities who may have been adversely impacted by their activities, the possibility to raise concerns/complaints in relation to human rights issues.

3.5 Motivation for engaging in human rights activities and associated challenges

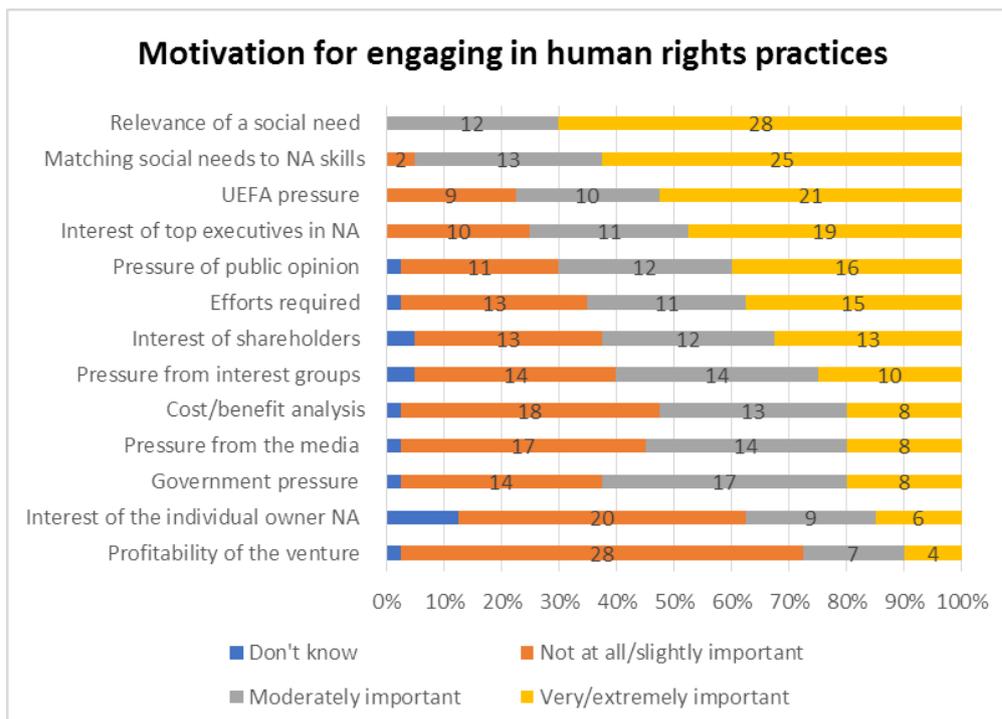
A matter of paramount importance is to identify why NAs decide to carry out human rights practices. In addition to institutional culture and organization (as set out in section 3.1), what is evident from the data collected is that the main driver is the importance of social needs (70% very/extremely important), while the most financially instrumental motivation, i.e. the profitability of the venture, is either not at all/slightly important for 70% of NAs.

Clearly demonstrating that NAs perceive they have a broader social responsibility, besides making profits.

This is corroborated by the fact that they want to offer an appropriate contribution by also considering whether they hold the proper skills to meet the social needs. Interesting is similarly noticing that in the motivations for engaging in human rights activities, UEFA pressure (considered either very or extremely important by 52,5% of NAs) trumps the pressure of the public opinion (40%), the interest of shareholders (32,5%), the pressure from interest groups (25%), from the media (20%) and finally from the government (20%).

This last finding suggests that, at least on human rights issues, most NAs consider themselves as rather autonomous, not subject to governments' pressure.

Figure 18 (N=40)



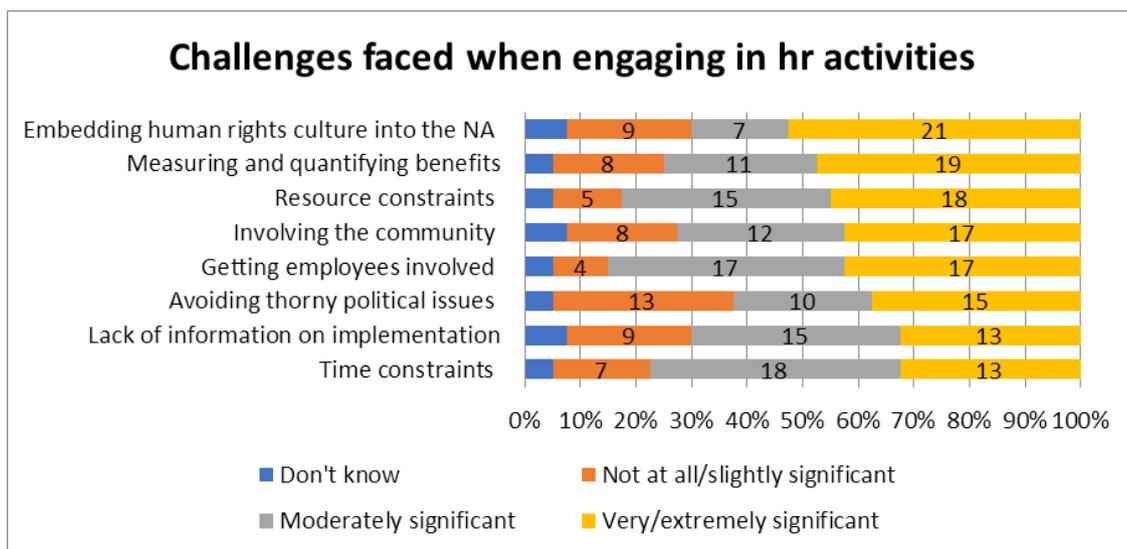
Undoubtedly, when assessing what drives NAs in engaging in human rights activities, challenges faced play an important role.

Surprisingly, as many as 52,5% of NAs perceives as a very/extremely significant challenge to embed human rights culture into the enterprise. This may signify that the human rights culture remains confined within the CSR department.

Moreover 45% of NAs pinpoints the problem of resource constraints. As a result, given that 51% of NAs declares receiving no funding from external donors (see figure 9), this means that they have to find financial resources internally. An explanation of the lack of monitoring mechanisms revealed in the previous questions is given by the fact that 47,5% of NAs consider it a very/extremely significant challenge.

Finally, involving the community or the employees (42,5% considers both of them very/extremely significant) affects the NAs engagement as well.

Figure 19 (N=40)



4. Conclusions and recommendations

Even merely considering the response rate, this research demonstrates how important human rights are to NAs. There is no answer saying that human rights in all their features are not an element worthy of consideration in NAs activities.

Hence, overall the results support the importance of such investigation.

The research was guided by 3 main questions.

First of all, the survey sought to understand the extent to which internationally-recognised human rights principles and norms shape the agenda of UEFA National Associations.

In this respect, what appears evident is that overall NAs do care about human rights, both when they carry out their core sport activities and when they engage in business with third parties.

However, despite this general positive attitude, it should be emphasised that NAs remain rather cautious to assume a more demanding engagement in terms of human rights promotion. And this dichotomous attitude appears highly robust and consistent in all the aspects considered in the survey.

For instance, **a remarkable high rate of NAs (equal to 80%) have a formal commitment to human rights**, which is envisaged by either a clause in their Statute or by a Code of Ethics.

However, only 12% has a formal and specific human rights policy, which is clearly more demanding both in terms of dedicated staff and budget.

Similarly, when engaging in business with third parties (supply chains, suppliers, other associates or governments), almost $\frac{3}{4}$ of NAs takes into account human rights when either engaging or terminating business relationships; 73% raises human rights concerns with governments when appropriate; and almost 60% encourages their business partners to adopt human rights practices.

Nevertheless, only 19,5% regularly inserts a clause on human rights within contractual agreements with supply chains, suppliers and other associates, whereas 46% either rarely do it or do not do it at all.

Also with regard to both sponsors selection and the decision on where to host a tournament, human rights are generally taken in due consideration, respectively by 66% and 54% of NAs.

Yet, as in the previous analysis, when the consideration implies a further formal engagement, the percentage of NAs taking human rights as an *essential requirement* is reduced to 15% (in the case of sponsor selection) and 7% (in relation to the choice of where to host a tournament).

Accordingly, it can be concluded that human rights represent an important - yet not essential - concern for NAs.

Secondly, the survey managed to identify and map the main human rights areas of intervention chosen by NAs.

In particular, the most recurrent issues are organised around three main clusters.

The **most relevant cluster** is represented by “non-discrimination”, declined in all its forms: racism, homophobia, and any other type of discrimination according to art. 2 of the UDHR.

The **second** (most recurrent) **cluster** of issues refers to the “integrity” concept: numerous NAs deem it fundamental taking into consideration anti-doping policies and the fight against illegal betting.

Finally, a **third important cluster** area is represented by human rights promotion of “vulnerable and specific groups” such as: women, people with disabilities, and children. In contrast, the least considered topics are promoting development in LDCs countries, and fostering peace building and reconciliation.

Again, these findings are remarkably robust and consistent throughout all the considered dimensions, namely: formal commitment; the decision process regarding the choice of tournaments venue; implementation of activities.

Moreover, it has to be stressed that these three clusters broadly reflects NAs’ perception of the three top human rights risks associated with football and NAs activities, that is (in a descending order): racism, corruption, and discrimination against minorities.

The survey also intended to explore how NAs make real their human rights commitment.

With regard to this, data revealed that only slightly more than 40% of NAs directly implement human rights projects.

However, it should be recalled that NAs have a general responsibility to oversee the organisation of football within a country and consequently they may not directly be involved in human rights initiatives “on the ground”.

In fact, the creation of partnerships appears to be the prominent mechanism adopted by NAs to promote human rights, drawing on the knowledge and expertise of actors already experienced in carrying out human rights-related activities.

Moreover, most of them join human rights project carried out by third parties like UEFA (71%), NGOs (63%), local/national institutions (56%) and schools/universities (44%).

By contrary, only 17% of NAs get involved in project launched by international institutions such as: the UN, the EU and the Council of Europe.

Another way of participating in human rights projects used by NAs is sponsoring local programmes through financial aid.

For example supporting homeless people (49%), local community or youth projects (44%), donating to charities (41%) or to hospitals and health care facilities (37%).

The third goal of the research project was to draft a possible framework of football and human rights.

Drawing on the findings of the survey, this framework can be delineate starting from two dimensions.

On the one hand, NAs are fully aware that they have a broader social responsibility besides managing and promoting football and making profits.

Indeed, more than 90% of NAs not only consider football as a powerful means to strengthen human rights respect even compared to other sports (due to its popularity, media coverage, global impact, accessibility, and capacity to overcome differences), but also NAs perceive to bear clear responsibilities in human rights promotion.

This is further corroborated by the analysis of the reasons why NAs decide to carry out human rights practices.

According to the data collected it is evident that the main driver is the importance of social needs (70% very/extremely important), while the most financially instrumental motivation, i.e. the profitability of the venture, is either not at all/slightly important for the 70% of NAs.

On the other hand, the survey allows to clearly identify some institutional and operational gaps in terms of human rights promotion.

Indeed, this survey found that, despite human rights are considered significantly important, only 49% of NAs has no specific staff working on human rights; merely 1 out 5 NAs regularly offer a training on human rights to their personnel; there is

a general low level of knowledge with reference to the tools dealing with CSR and BHR (including the UN Global Compact and the UNGP); more than 60% of NAs do not have a specific budget allocated on human rights; due diligence mechanisms are generally not used with regularity (especially external communication of human rights activities and human rights monitoring).

The key explanation for these figures is that the main responsibility of a NA is to organise and promote football at all levels, and therefore human rights might not be high on the list of priorities. However, the survey also suggests that many NAs are aware of the existing pressures to engage in human rights and are attempting to formalise and institutionalise their commitment.

Accordingly, the following framework builds, on the one hand, on the positive attitude displayed by NAs towards their responsibility in promoting human rights, with the purpose of enhancing it; on the other hand, by a set of human rights gaps in NAs practice and governance, aiming at overcoming them.

In addition, this framework will also bridge the gap between CSR and BHR, showing how both approaches can work together to a greater aim.

Football For Human Rights Framework

1. Implementing a specific human rights policy within the NA. This will be the step forward compared to only having either a human rights clause in the NA Statute or in the NA Code of Ethics.
2. Carrying out a Human Rights risks analysis. Thanks to this each NA will identify which human rights are at risk in their country and implement a human rights policy based on that. The survey results showed that generally speaking racism, corruption, doping and vulnerable persons (especially women and minorities) are considered as top risks. Nevertheless, a local analysis would help to better tailor a specific human rights policy for each NA.
3. Having a specific and trained staff working on human rights. The survey clearly showed that not many NAs have a specific staff dealing with human rights issues beyond the need for their training. This is perceived as a necessity by the respondents who also underlined as a challenge the fact that a human rights culture is generally confined to the CSR department.
4. Organizing roundtables between IOs, NGOs, IGOs and NAs on human rights. The need for debate and seminars on human rights was demonstrated by the interested showed by the participants during the dissemination event in Malta. This demonstrated that having the possibility discussing on human rights with experts is important to professionals working in the football environment.
5. Broadening the human rights funding system. The survey showed that a really small percentage of NAs apply for funding granted by International Institutions (like the EU). Since the lack of budget for human rights practices was felt as an hindrance by the majority of NAs, trying to reach other source of funding would be beneficial.
6. Inserting a human rights clause when doing business with third parties. When engaging in a business relationship with third parties (supply chains, suppliers and other associates) introducing as essential requirement the respect for human

rights. For example the UN Global Compact lists a series of enterprises that respect human rights.

7. Inserting human rights as essential requirement for sponsors and tournament venues choice. Ensuring that the choice of sponsors is also based on human rights respect is fundamental. The same reasoning applies for the choice of where to host a football tournament (A simple example could be choosing a stadium because it is barrier free).
8. Implementing a human rights monitoring system. In order to have efficient human rights projects and amend their implementation according to the targets' needs, they must be monitored and evaluated. This will be fundamental in order to understand their impact and be accordingly improved.
9. Strengthening UEFA key role in human rights promotion. UEFA is already the main driver of NAs human rights activities. Suffice it to mention that it is the major source of funding, it triggers human rights projects which NAs take part in, and it is perceived as the main font of pressure when it comes to human rights. Hence, UEFA could enhance its role by:
 - a. Strengthening the CSR department;
 - b. Promoting partnerships among NAs on human rights projects;
 - c. Promoting human rights projects monitoring and evaluation;
 - d. Liaising with human rights International Organisations and acquiring consultative status to the ECOSOC;
 - e. Partnering with the UN Human Rights Council asking for a specific branch addressing sport within the business and human rights sector.

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ANNEXES

- Appendix A - National Associations Survey
- Appendix B - UEFA Endorsement Letter
- Appendix C - Civil Society Organisations Survey
- Appendix D - Leaflet of the event in Malta
- Appendix E - List of CSOs Survey Respondents