A review of the Human Rights Volunteers programme at the FIFA World Cup Qatar 2022
ACKNOWLEDGEMENTS

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HUMAN RIGHTS VOLUNTEERS

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Images: Photos in this review have been gratefully received from Human Rights Volunteers involved in the FIFA World Cup Qatar 2022 alongside professional images sourced from Getty Images.

Cover image: A Human Rights Volunteer on shift at Al Janoub Stadium, Qatar
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This review by the Centre for Sport and Human Rights (CSHR) provides an overview of the Human Rights Volunteers (HRV) programme as rolled out at the Fédération Internationale de Football Association (FIFA) Men’s World Cup Qatar 2022 (FWC 2022) from 20 November to 18 December 2022. The review provides details of the programme’s operations and focuses on the main successes and lessons - providing recommendations for the future with a view to mainstreaming such initiatives at other Mega-Sporting Events (MSEs). This review is narrow in scope and aims to:

- Reflect on how the programme operated across official tournament venues.
- Share substantive findings to assess the effective delivery of the programme.
- Offer a series of recommendations on how to build on this foundation for future events.

Recommendations are addressed both to FIFA and to other event owners and organisers considering developing HRV programmes.

The HRV programme at FWC 2022 was part of FIFA’s due diligence process and, for CSHR, an operational contribution to a much broader long-term effort by stakeholders across the sport ecosystem and beyond to raise awareness of human rights issues in the context of Qatar’s hosting of the World Cup and determine how these issues could be addressed. As such, this review is not:

- An assessment of the broader human rights environment in Qatar or issues that arose in the lead up to and around FWC 2022.
- An analysis of the human rights impacts of the FWC or the effectiveness of the wider FWC 2022 due diligence processes or the FIFA human rights grievance mechanism for the FWC 2022.

This review draws from interviews with key FIFA personnel, HRV Project Managers, Ergon Associates (the consultancy that supported FIFA’s Human Rights team in assessing and addressing event-time issues), the Office of the UN High Commissioner for Human Rights, the Supreme Committee for Delivery and Legacy (SC) (the government entity
responsible for delivering Qatar’s World Cup infrastructure), as well as representatives of civil society organisations (CSOs) and others. In addition, four focus group sessions were conducted with the HRV Team Leaders and some HRVs, and a survey of the HRV cohort was conducted with a 47% response rate. The report is also informed by presentations and discussions at a stakeholder briefing on the programme convened by the Government of Switzerland at Swiss House, Doha (25 November 2022), and a mid-programme review meeting during the tournament. The meetings were conducted on the basis of non-attribution and the volunteer survey was anonymous. Quotes from HRVs used throughout this review are drawn from the survey.
INTRODUCTION

Overview

Human Rights Volunteers is a new concept in the context of sport events, designed to enable major event owners and sporting event organisers to identify and respond to real-time human rights concerns at their competitions. Developed by FIFA with support from CSHR, the first ever HRV programme was implemented at the FWC 2022. This programme grew out of a need to observe, identify, and document live human rights concerns, and where necessary escalate these for follow-up, corrective action or remedy.

While an MSE of such scale taking place in Qatar presented particular host-country specific risks during games-time, many of the challenges identified through the HRV programme are typical of any major project of this nature. Volunteers in the programme underwent training to be aware of potential human rights risks specific to major event contexts. FIFA invited CSHR to collaborate on delivering the programme after CSHR had lent support to a small pilot initiative conducted at the FIFA Arab Cup 2021 (FAC 2021) which took place in Qatar during November and December 2021.

A total of 89 HRVs were deployed across nine venues in Qatar for FWC 2022. The lessons from this experience will inform future FIFA volunteer programmes and enable CSHR to partner with other major events and host cities in developing their own HRV initiatives and volunteer training schemes. As a new endeavour, HRV operations at the FWC 2022 were restricted to those areas where FIFA had control and could offer accreditation - namely the eight stadiums and the FIFA Fan Festival that comprised “the official tournament venues”, and extending to the “last mile” (i.e. the area between the transport drop off points and each stadium’s outer perimeter). The programme ran for the duration of the tournament. While labour rights and worker welfare issues were encountered by HRVs, and thus covered in this review, the scope of the project’s mandate did not officially address labour rights which were under the purview of the SC’s Workers’ Welfare unit.
During FWC 2022, HRVs lodged reports of their human rights observations and findings from interviews with stakeholders using a bespoke form on their mobile personal devices, earmarking certain reports for potential referral to FIFA's human rights grievance mechanism. The aim was to enable FIFA to record what was working well and areas where it needed to respond in real-time to concerns or provide remediation. In total HRVs submitted 1817 reports. A large percentage of these were findings of a positive nature on what was working well organisationally in terms of fan and others' experience, including overall safety, efficiency of transportation, the atmosphere for fans and the press, and a professionally run event. Team Leaders at each venue escalated a total of 334 reports considered more serious in nature (often clustering common issues together at the same shift), of which Project Managers referred 174 cases to the FIFA Human Rights team for follow-up. The experience of the HRV programme at the FWC 2022 showed that such a programme can be beneficial in helping to unearth (or gather additional data on) both positive experiences and situations requiring improvements to existing protocols across a wide range of operational areas.

“One of the groundbreaking and innovative aspects of the Human Rights Volunteer programme is that it enables real-time pivots to operational protocols for human rights-related risks or harms when a mega-sporting event goes live. When they go live these events always have bumps, despite rehearsals and test events. So being able to have a system in place to observe, escalate and provide real-time feedback on human rights, enabling the organisers to make changes quickly – is a major value add and helps everyone.”

Mary Harvey, Chief Executive, Centre for Sport and Human Rights
These range from mobility support service challenges, racial profiling at security gates and in and around venues, the confiscation of items ranging from medicines, baby-milk, items of cultural significance (e.g. drums) to peaceful protest t-shirts, scarves and flags bearing rainbows and other officially permitted slogans, cases of alleged arbitrary detention, sexual harassment, and workplace bullying and other working condition issues, some affecting volunteers. These and other findings are examined in more detail below in Part 4.

CSHR’s vision is for future HRV initiatives to build on the learnings of this first programme to offer a cost-effective and readily accessible resource for event owners and organisers as part of implementing their human rights responsibilities. Such programmes will enable proactive responses to real-time event management of human rights risks, build a human rights community around events, and provide an initial level of accountability. Looking further ahead, there is potential to expand the scope and objectives of HRV programmes.

“I got to deal with people from many cultures and many fields, and to feel that we are making a difference in a place where it is hard to be a human rights volunteer.

Human Rights Volunteer, Education City Stadium
WHAT ARE HUMAN RIGHTS VOLUNTEERS?
1. WHAT ARE HUMAN RIGHTS VOLUNTEERS?

Human Rights Volunteers is a new concept in the context of sport events that can be likened to the role of election observers or protest monitors in other contexts. Such independent monitoring is typically conducted by neutral actors that may be affiliated to international organisations or work with human rights groups or civil society organisations. Protest monitors, for example, provide "an intentional and organised presence of monitors at public assemblies to observe, document and report both the flow of events and the interaction of participants, the police and other state authorities."

Observing is a non-obtrusive activity involving attending and watching what takes place and conducting interviews, but differs from participation because the aim is for observers or monitors “to have an impact on behaviour" either through their presence or by publicising what they have witnessed. Recording and documenting a range of activities, monitors are visible, in part, because they typically work in small teams and take notes and/or photographs. Monitoring projects also typically produce reports based on their findings and experiences, often documenting trends and patterns of behaviour. In some cases, monitors are authorised and empowered to intervene, but this is often not the case. While not true for individual HRVs, the wider HRV programme was designed to enable intervention through escalation and follow-up on potential changes in behaviour. While this review covers a first iteration HRV programme, developed with a specific mandate for the FWC 2022, the concept can be considered more broadly to encompass the following elements.

Human Rights Volunteers programmes are designed to:

- **Observe**: Observe trends in behaviours and practices related to human rights, including the performance of accessibility and security services and interactions with fans;
- **Interview**: Conduct interviews with fans, workers, and volunteers on their experiences;

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1. *Handbook on Monitoring Freedom of Peaceful Assembly*
2. *Handbook on Monitoring Freedom of Peaceful Assembly*
• **Document**: Systematically report observations on human rights concerns for follow-up;
• **Refer**: Inform stakeholders about availability of relevant complaints procedures; and
• **Escalate**: Identify material concerns requiring swift intervention and follow-up.

In practice, the Human Rights Volunteer role is to:

• **Be human rights aware**: Pay particular attention to vulnerabilities and monitor potential harm to at-risk individuals and groups;
• **Monitor**: Identify human rights risks and challenges on the ground in real-time;
• **Signpost human rights resources**: Direct fans, workers, volunteers and others to relevant grievance mechanisms so they can lodge concerns or make formal complaints;
• **Collect data**: Record human rights-related impacts arising with a view to improving systems over the long-term and providing evidence to support follow-up measures; and
• **Share learnings and experiences**: Form an informal human rights community contributing a legacy of human rights education and engagement for HRVs.

For event owners and organisers, a Human Rights Volunteers programme contributes to:

• **Risk management**: An early warning system to support ongoing human rights due diligence, identify and document risks in real-time, and support timely responses to issues and making urgent system adjustments as needed;
• **Engagement**: A structured programme to engage with and learn from civil society, human rights experts and fans to collaboratively reduce event-related risks of harm;
• **Legacy**: A vehicle to build human rights knowledge and experience within the volunteer pool that will outlive the event lifecycle, and curricula which can be adapted for future events;
• **Accountability**: A mechanism to provide a visible presence at operational sites to raise awareness, prevent and deter wrongdoing, and help hold relevant authorities more accountable through greater transparency; and
• **Compliance**: A system to support meeting human rights responsibilities and implementing effective due diligence.
WHY HUMAN RIGHTS VOLUNTEERS?
2. WHY HUMAN RIGHTS VOLUNTEERS?

2.1 Upholding human rights responsibilities

Sport and human rights is an emerging field that has gained momentum in recent years against a global backdrop of greater focus on inclusion, sustainability, environmental, social, and corporate governance considerations. It also comes against a backdrop of greater awareness of the range and scale of human rights risks and harm in sport, which has precipitated growing adherence by sports bodies to the UN Guiding Principles on Business and Human Rights (UN Guiding Principles). Endorsed by the UN Human Rights Council in 2011, the UN Guiding Principles lay out a human rights risk management and compliance model for commercial activities that continues to be referenced and embedded in national laws, regional directives, and soft-law standards. Over the last decade, leading sports bodies and event organisers have increasingly been referencing the UN Guiding Principles as a roadmap to ensure their activities respect human rights and avoid harm. A principal consideration is that sport activities should enjoy the trust, legitimacy and consent of (or "social licence" from) affected stakeholders – including those who are vulnerable or historically marginalised. A key way to achieve this is to conduct ongoing human rights due diligence.

Human rights due diligence requires all organisations to take responsibility for addressing any harms with which they are involved by implementing processes to proactively identify, prevent, minimise and account for how they address adverse human rights impacts. It consists of four steps:

1. Assessing actual and potential human rights impacts;
2. Integrating the assessment findings across the organisation and taking action;
3. Tracking the effectiveness of measures and responses; and,
4. Communicating with stakeholders about how impacts are addressed.

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This should be backed up by access to effective systems that provide adequate remedies for people who have experienced a wrong, harm, or injury so that these are made good or redressed.

The HRV concept provides a missing link in this ongoing human rights due diligence matrix, and aims to support event owners and organisers in identifying and documenting risks in real-time during the event. The programme quickly pinpoints isolated and broad operational issues, many of which can then be addressed quickly, which is important for a mass public event with a short timeline. It also offers a means to capture and take on board stakeholder views, to track performance, and to identify and fill gaps in existing systems. From a fans perspective, HRV programmes can help fans to feel heard and have a sense that someone is listening to their concerns when difficult situations arise, and can lead them to access a complaints systems or grievance mechanism so that those who have experienced or witnessed a wrong or harm can lodge concerns, raise a formal complaint, and pursue remedy.⁴

⁴ HRVs at FWC 2022 directed fans to FIFA’s event grievance mechanism using a QR code. The mechanism and QR code were also widely publicised on official literature shared with fans.

“I got the responsibility to protect human rights. This is my lifetime achievement.”

Human Rights Volunteer, Al Janoub Stadium
2.2 Addressing games time risks

Major sporting events come with human rights risks and opportunities. Many of these arise during what is referred to as ‘games time’ which is the final preparation and execution stage in the overall lifecycle of an MSE. Games time comprises the delivery and operation of the event and the sporting competition itself.

Games time brings human rights benefits and opportunities\(^5\), such as new jobs, increased access to sport facilities, improved consideration for people with disabilities and new accessible physical infrastructure. At the same time, evidence shows that some human rights risks persist from event to event irrespective of the host country’s human rights record, even if their nature and severity differ. Such risks, many of which were significant in the context of Qatar, include but are not limited to:

- **Discrimination** in employment practices, access to event venues and access to local services and unequal treatment in services.

- **Safety and security** concerns including crowd control breakdown, arbitrary arrest and detention, excessive use of force, surveillance and airport-style security checks that interfere with privacy, property confiscation of not officially prohibited items, racial profiling, and constraints on peaceful protest and rights to freedom of expression and association.

- **Public health and medical services** shortcomings impacting athletes, fans, vendors and others attending the event, including responses to health crises and disease outbreaks, potentially overstretched medical facilities and staffing responding to higher volumes of patients than normal, and acute pressures in the event of extreme weather, natural disasters, or terrorist attacks coinciding with games time.

- **Worker rights** abuses involving actions or inactions by event organisers, contractors and third-party providers of products or services.

- **Forced labour and human trafficking** risks exacerbated by the need for temporary and short-term labour and lack of regular protections, particularly for migrant workers, including hospitality sector pressures,

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\(^5\) In 2020 the Centre for Sport and Human Rights published a guide: *Games Time: Planning and Acting to Respect Human Rights in Mega-Sporting Events* outlining the risks and opportunities.
and heightened risks of sexual exploitation including of children.

- **Housing, land and property rights and adequate standard of living** under duress with the influx of visitors, rental price gouging, clearances and forced evictions of informal settlements and homeless populations, under-resourced homeless shelters put under additional strain, indigenous lands and cultural rights not respected or protected, water, sanitation and other essential services overwhelmed.

- **Women and children's rights** impacted including instances of intimidation, harassment and sexual abuse among fans and athletes, heightened risks of domestic violence, aggressive corporate marketing aimed at children, child athletes and volunteers confronted by abusive fans (at venues and online), physical and mental health risks.

- **Freedom of expression and press freedoms** jeopardised, including reporting being censored, journalists denied reasonable access, rights to information and freedom of expression not safeguarded, athletes, spectators and community members exposed to hate speech or incitement to violence in person and on-line.

- **Irregular migration** heightened risks, including failure to protect refugees, asylum seekers, victims of trafficking, and unaccompanied migrant children.

HRVs for the FWC 2022 were positioned to observe and document some but not all these games time risks. As a first time effort, FIFA limited the scope of HRV operations to areas where FIFA had a responsibility for operations impacting the attendees - namely the last mile, stadium and FIFA Fan Festival precincts. Risks and incidents beyond these areas did, however, come to light in interviews with fans and others, and through HRVs own first hand experiences.

FIFA conducted a formal human rights salience analysis for the FWC 2022. Beyond the wider MSE lifecycle risks associated with construction, supply chain and other workforce-related activities, FIFA identified a range of risks for attendees, participating media representatives, and human rights defenders. The following topics were identified as being the most salient and material: “accessibility”, ”cultural understanding” (including restrictions on freedom of opinion and expression); “health, safety and security” (including appropriate security practices and use of

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6 Human rights salience analysis for the FIFA World Cup Qatar 2022
force); “inclusivity” (including freedom from discrimination, and freedom of movement); and the “rights of media representatives and human rights advocates” to be safe from arbitrary detention, arbitrary interference, and restriction or punishment for the expression of thoughts or opinions. Working conditions at games time were also identified as a key area of concern.

It should be noted that many of these risks are contextual to Qatar, a country that has made noted progress on a range of rights issues in recent years, but which remains high risk in a number of critical aspects. For example, it has been reported that national origin and nationality currently play an “overwhelming role in determining access to human rights in Qatar”7. Further, Qatar’s penal code criminalises extramarital sex, with such laws disproportionately impacting women, including where women have reported rape. Qatar also criminalises consensual sexual relations between men with up to seven years imprisonment, presenting an ongoing risk to those who live in Qatar and that also applied to visitors for the World Cup, including athletes, fans, workers, volunteers and the media.

“I believe in my own small way, I contributed to improving the operations and organisation of the FIFA World Cup. Knowing that I might have impacted a person’s life or future is a very rewarding experience for me.

Human Rights Volunteer, FIFA Fan Festival

2.3 Filling systems gaps

From 2017 onwards, leading international sport bodies that own the world’s most prominent MSEs have started to adopt human rights policies and make commitments to adhere to the UN Guiding Principles. FIFA has been at the forefront of this development, seeking guidance from the architect of the UN Guiding Principles, John Ruggie, on embedding respect for human rights across its activities

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7 Visit to Qatar, Report of the UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance.
and relationships. In 2017, FIFA published a Human Rights Policy⁸ and formulated a strategic direction to ensure FIFA's events and activities meet the organisation's human rights responsibilities in line with the UN Guiding Principles. At the FIFA World Cup Russia 2018 (FWC 2018) - FIFA's first experience in putting its new human rights approach into practice at events, FIFA identified it needed better ways to assess the impact of its policy and human rights procedures in real time. According to FIFA, it needed to answer the question: "How do we identify issues on the ground during our tournaments in a more systematic way, including by hearing directly from spectators and those impacted?"

The FWC 2018 experience showed that one of the biggest gaps FIFA faced was with its own "information gathering" systems. The FIFA 'sustainability venue managers programme' was in its infancy at this time, and lacked the capacity and training to investigate what was happening first-hand regarding human rights impacts. Similarly, while FIFA's anti-discrimination monitoring systems were able to spot some human rights issues within the scope of their remit where these overlapped with human rights, it was not possible to pick up the full spectrum of games-time human rights risks (e.g. sexism in the streets, concerns around press freedom and the treatment of journalists), and this meant relying at the time on information shared by NGOs, picked up on social media or raised through FIFA's complaints mechanism for human rights defenders and journalists. The HRV programme was therefore specifically designed to pick up concerns that could fall through the cracks of the existing programmes, while hearing directly from stakeholders about their experiences.

“I feel proud of being part of a human rights initiative during the World Cup that took place for the first time in my Arab Region. I also think that this was the first step in the ladder to integrate and mainstream human rights into sports competitions.

Ali Najjar, Senior Project Coordinator, Arab Foundation for Freedoms and Equality. Human Rights Volunteer Team Leader, Education City Stadium

VOLUNTEERISM AT MAJOR EVENTS

MSE owners see volunteers as critical to the access of their events, while the volunteers themselves often take pride in taking part in a global event. MSEs typically recruit and deploy thousands of volunteers, and at FWC 2022 volunteers supported operational delivery “across 45 functional areas at official and non-official sites”9. Wearing recognisable uniforms, volunteers typically assist athletes, teams, spectators, and others with customer service, press and communications, health services, technology, protocol and languages, transport, ceremonies, and in operational support roles for event organising committees. Such reliance on volunteers must be tempered with responsibility.

Volunteers give their time “freely to benefit another person, group or organisation” with “an attitude of social responsibility”10 and in so doing have “a tremendous impact on the creation of positive experiences and memories for all participants and spectators”11 while themselves feeling part of a big occasion, making friends, and benefiting from training and personal development opportunities that lead many to join a global circuit of sport event volunteering, or to pursue careers connected with their role such as in sport administration, entertainment or athletics.

Volunteers give up sometimes several weeks of their time for free, expecting to work hard but also to have fun. In return they expect to be treated with at least the same degree of respect that event owners and organisers show their paid staff. This spirit of giving however is not always reciprocated. The demands placed on them are frequently intense, promised volunteer legacies in host communities are often neglected12, and event owners do not always live up to their duty of care to volunteers, or ensure volunteer opportunities are open to all and not just those with financial means.

In Qatar the FWC 2022 relied on unpaid volunteers, many of whom were migrants living and working in Qatar on humble means. The organisers should be commended for covering international volunteer accommodation costs and implementing a visa regime that enabled a globally diverse volunteer pool to take part. Looking ahead, opportunities should be explored across all sports events to find ways to further enhance measures to ensure volunteers enjoy safe working conditions and to support wider participation from disadvantaged communities.

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10 Ellis and Noyes 1990, p. 3.
12 https://unbscholar.lib.unb.ca/islandora/object/unbscholar%3A9088

Rights Up Close: A review of the Human Rights Volunteers programme at the FIFA World Cup Qatar 2022
IMPLEMENTING THE HUMAN RIGHTS VOLUNTEERS PROGRAMME: LESSONS FROM QATAR 2022
3. IMPLEMENTING THE HUMAN RIGHTS VOLUNTEERS PROGRAMME: LESSONS FROM QATAR 2022

While a small pilot was conducted a year before FWC 2022 at the FAC 2021, the vision for an officially sanctioned HRV programme was new for the FWC 2022. Indeed, this was the first time anything of its kind had been attempted on the scale of a World Cup. Putting such a programme into practice in a context like Qatar - under scrutiny over human and labour rights issues for more than a decade - was doubly ambitious. As such, it was inevitable that there would be successes and areas of concern in the roll out. A balanced assessment of the HRV programme’s implementation is therefore essential to capture and build on what worked well, learn from and correct mistakes, and identify how to improve the programme gradually as it expands over time in line with continuous improvement.

Beyond FIFA and CSHR, the HRV programme at FWC 2022 was supported by a wider circle of actors, including: the Office of the United Nations High Commissioner for Human Rights (OHCHR), Football Supporters Europe (FSE), and ILGA World – the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA). The programme also had the explicit backing and support of the SC.

The HRV programme at the FWC 2022 covered nine venues, and involved the participation of 78 Human Rights Volunteers, 11 Team Leaders, and 2 Project Managers (one each from CSHR and FIFA), and was integrated into FIFA’s wider event-time human rights due diligence for FWC 2022.

This Part 3 of this review examines processes underpinning the HRV programme, in particular:

- **Recruitment and Selection**
- **Training and Capacity Building**
- **Programme Operations**

FIFA had oversight of these functions in partnership with the FWC 2022 organisers, with CSHR supporting recruitment, helping to deliver training,
collaborating on programme delivery, contributing personnel, and supporting project management.

Each section examines what worked well, identifies opportunities for improvement, and offers a series of recommendations for future HRV initiatives.

### 3.1 Recruitment & selection

**Recruitment**

Recruitment for the HRV programme operated on twin tracks, one for the pool of 78 HRVs and one for the contingent of 11 Team Leaders. HRV recruitment primarily went through the main overarching volunteer recruitment process adopted by FIFA and its local organising entity for its major tournaments, involving a campaign of public outreach inside and beyond Qatar to encourage applications for all the variety of volunteers needed for tournament operations.

Targeted efforts were made to identify candidates with direct human rights expertise and to encourage candidates with human rights backgrounds to apply for the programme. FIFA and CSHR reached out to Doha-based UN agencies, FIFA’s commercial sponsors, as well as networks of CSOs, academics and policy professionals with expertise in sport and human rights. They all proactively shared details of the HRV programme with prospective volunteers, as well as nominating their own staff and representatives to be HRVs, resulting in a number of human rights experts and advocates having roles within the programme.

To ensure HRVs could be recruited and onboarded as part of the event’s broader workforce strategy, HRV roles were designed to have the status and protections that come with the official volunteer programme. For that reason, all HRVs had to apply through the formal FWC 2022 volunteer recruitment process to ensure they received accreditation and were assigned official uniforms. Applicants could express specific areas of interest or competence, including on human rights, but had no option to give an explicit preference to be a human rights volunteer.
While efficiently processing a large number of candidates, the centralised online volunteer portal and recruitment process could have been more sensitive to the particular concerns, needs and vulnerabilities of some individuals. In particular, LGBTQI+ people and people with disabilities were viewed in some feedback as facing additional risks due to the design of the online portal. Equally important, there were concerns expressed at organisers not adequately reassuring candidates over how disclosures of personal information would be used and stored. These pitfalls potentially excluded persons with relevant lived experience from the HRV pool.

Selection

From the larger volunteer pool of 20,000 volunteers, FIFA’s Human Rights and Anti-Discrimination teams identified those with relevant interest and skills. Prior expertise in human rights was not a requirement, but persons who indicated human rights as a particular skill were earmarked as likely candidates. Furthermore, individuals with skills in areas like conflict management, social work, humanitarian or development projects, research, and communications, and those with managerial experience or who regularly interacted with the general public were also considered for the positions. The result was a long-list of approximately 110 candidates for the HRV programme.

HRVs were assigned to specific venues and roles before formal offers went out and accreditation was granted. Only alumni from the FAC 2021 pilot, and the HRVs proactively recruited via human rights networks went into the programme with existing human rights experience, and a basic understanding of their role in advance. For the majority of HRVs, however, most of whom were residents of Qatar, it was only at the point of being offered a formal volunteer role that they first were made aware that they would be undertaking human rights related duties.
I became more aware of my duty to society and it became a light for all my life.

Human Rights Volunteer, Ahmad Bin Ali Stadium

Human rights observing of any kind comes with a degree of personal risk. In any context, operating in close proximity to and witnessing the actions of security officials, for example, runs the risk of interference, retribution or retaliation. For the majority of HRVs who were non-Qatari nationals whose right to remain and work in the country hinged on their residency permits, the risks were greater still. The HRV survey showed that many volunteers were not informed by the organisers on the details of the role they would play until the first human rights training session, although it was possible to request a role change had HRVs expressed concerns.

No volunteer explicitly declined to take up their HRV role or undergo the training because of the human rights designation. There was some normal drop-off in numbers prior to the start of the event (with vacancies filled by a small contingent of HRV reserves), but it was not possible to track if any of those who dropped out did so because of perceived concerns about the HRV role.

Recruitment began three months prior to the start of the World Cup. This compressed timeline and bureaucratic obstacles to having specific human rights recruitment criteria for such a new programme meant many HRVs had limited knowledge of the activities required of human rights monitors going into the training, and so faced a steep learning curve. Combined with limited training on how to document their reports, this had knock-on effects for Team Leaders who had to devote extra time in the programme's early days to build team members' capacity, which arguably affected the initial quality of reports and triage in the early days of the programme.
The majority of HRVs were long-term residents of Qatar. By design, they were recruited from a broad range of nationalities and professional backgrounds, and were supplemented by international volunteers drawn largely from West and South Asia. Team selection was carried out with a deliberate eye to diversity to ensure a breadth of language skills and gender balance across the teams allocated to each venue. As a result, the teams at each of the nine official venues included a mix of volunteers from different regional, religious, ethnic and nationality backgrounds, in total comprising representation from 33 different nationalities. This extremely diverse pool of HRVs was indicative of the diversity throughout the broader volunteer scheme at FWC 2022.

While English was the working language in which all HRVs were required to be proficient, a proactive attempt was made to allocate at least two Arabic speakers to each venue - and where numbers allowed, for these to be of different genders. Importantly, each team also had a spread of HRVs who spoke Hindi, Nepali, Bengali, Urdu and Tagalog so interviews could be conducted in languages most widely spoken among the wider fan and worker base in Qatar. Farsi and Spanish speakers were additionally allocated to venues expecting to host football teams and fans from Iran, and the various Spanish speaking nations participating in the tournament.
respectively. Team Leaders maximised this intentional linguistic diversity where possible by pairing up HRVs proficient in different languages.

Diversity among Project Management and Team Leaders was more limited. For the Team Leaders the gender mix was good, and broadly equal among the Project Management and other more senior programme posts within FIFA. While among Team Leaders, proactive recruitment and collaboration with CSOs ensured relevant representation from the LGBTQI+ community, there was limited representation of persons with disabilities. Meanwhile, FIFA’s human rights team, the Project Managers and Team Leaders were all overwhelmingly white and from Europe and North America. Of the Team Leaders, only two were residents of Qatar, and just one Team Leader was from West Asia, all others in senior project roles were European or North American nationals.

For this largely untested initiative, all Team Leaders were pre-selected by FIFA and CSHR. In the absence of a robust civil society in Qatar, almost all were non-residents of the country. All had experience in sport and human rights. CSHR itself contributed six members of staff with subject matter expertise, while Football Supporters Europe and ILGA nominated one Team Leader each from their networks. The remaining Team Leaders participated in a personal capacity bringing relevant human rights expertise from legal, academic and advocacy roles. One Team Leader was an alumni from the FAC 2021 pilot programme.

CSHR, as agreed with FIFA, facilitated civil society representatives being able to participate directly in the HRV initiative as Team Leaders by bringing those Team Leaders into CSHR’s delegation and securing financial support. Importantly this allowed for fan voice, and regional and LGBTQI+ perspectives to be woven into the Team Leadership, and for human and labour rights perspectives to find expression within the programme, ultimately facilitating opportunities for CSOs to experience MSE delivery from the inside. It will be important in future to continue to weave civil society voices and perspectives into HRV programme design.

The travel and accommodation costs for CSHR’s Team Leaders to participate in the programme were met by FIFA. FIFA additionally covered modest per diems for the living costs of these Team Leaders. The tournament organisers also provided accommodation to all the international volunteers, including those on the HRV programme, which was a first for any MSE. This groundbreaking decision importantly enabled volunteers to participate in the programme who may have otherwise
will always be a challenge for human rights experts to make personal or organisational sacrifices to participate without remuneration, and there is a risk that without financial support of this kind, participation by representatives from smaller or less resourced human rights organisations would be compromised or more limited at future MSEs.

“The engagement of a diverse selection of volunteers, including LGBTI people, engaging as human right observers is critical to the success of Human Rights Volunteer programmes. Seasoned LGBTI advocates are equipped and experienced to ensure mega sporting events are safe and inclusive for all, including LGBTI people.”

Gurchaten Sandhu
Director of Programmes
ILGA World – the International Lesbian, Gay, Bisexual, Trans and Intersex Association

Recommendations

Based on the experiences at the FWC 2022, the following are recommendations on recruitment and selection for organisers implementing a HRV programme:

- **Convey risks to participants.** Human rights observing roles come with a degree of personal risk which is more pronounced in some contexts than others. HRV recruitment and selection should operate on the principle of informed consent. All HRVs should be fully apprised of the potential risks they could face personally or witness, and be given the opportunity to grant their explicit consent.
• **Recruit broadly.** HRV recruitment criteria are needed that allow for a mix of human rights experts and those with other relevant “soft” skills to bring a blend of practical skills to the volunteer teams, and help provide accountability. Positive personal development opportunities are an integral part of volunteering and should be preserved. The programme should be open to students and others with a professional or personal interest in human rights, so they can benefit from human rights training, advance their careers, and/or become part of a local human rights community.

• **Be proactive on inclusion.** Diversity and inclusion are an integral part of the HRV programme. Recruitment and selection should ensure diverse representation from all groups in society across the main HRV pool, and in particular among senior roles like Team Leaders and Project Managers. Diversity should be tracked and monitored, steps put in place to combat recruitment bias, with efforts made to increase opportunities for historically or structurally disadvantaged groups or those from traditionally underserved communities or geographies. Recruitment processes should be informed by the voices of affected people, including those with lived experience to engender the trust of all.

• **Integrate local knowledge.** HRV recruitment, and Team Leader selection in particular, should be drawn primarily from local populations to ensure cultural familiarity and local insight (including an understanding of the diverse fan base or portions of it) across the HRV pool where the local context allows. In contexts where there is robust civil society activity and groups can operate safely, every effort should be taken to recruit from local civil society networks.

• **Invest in diversity.** Financial support covering per diems and accommodation costs for international HRVs and Team Leaders should be a permanent feature of HRV programmes to allow people from less resourced organisations and groups to participate.

• **Market the new human-rights aware community.** Building a local human rights community should be a core aim of HRV recruitment and marketing to encourage people with critical minds and human rights interests to apply. This should be promoted locally in the host community. The role should also be advertised through human rights networks with CSO and other human rights experts encouraged to sign-up.
I worked on the FIFA World Cup in Qatar from the awarding decision in December 2010, first as a volunteer for Transparency International in fighting corruption in sport, then addressing human rights challenges for migrant workers in the country, founding the Sport and Rights Alliance, and finally as a member of FIFA’s independent Human Rights Advisory Board (2017-2020). So I wanted to experience the event on the spot and the best way to really be a part of such a tournament is working as a volunteer. I did not watch a single match but instead talked to my fellow human rights volunteers, to many other volunteers, fans and workforce – be it from around the world, residents in Qatar or Qataris. That gave me the opportunity to learn about Qatari history and society, the achievements as well as ongoing challenges for migrant workers and in other areas of human rights. It was such a great experience!

Sylvia Schenk
Volunteer, Transparency International Germany
Member of FIFA’s Independent Human Rights Advisory Board (2017-2020)
Human Rights Volunteer Team Leader, FIFA Fan Festival
3.2 Training & capacity building

Human Rights training

One of the aims of the HRV programme was to build human rights observing capacity and to create a positive legacy through the development of a local human rights-aware community. Although there was a mix of human rights knowledge going into the programme, all volunteers needed training on their roles. Training comprised two 3-hour sessions, one online session six weeks before the start of the tournament, and the second in Doha the day before the FWC 2022 began. Some e-learning about venues and local culture was also available but this was not role-specific.

The HRV specific training provided volunteers with an introduction to international human rights, a grounding in games-time human rights risks, including in the context of Qatar, and a deep dive into the roles and responsibilities of HRVs, with instruction on the daily routine, basic guidance on conducting interviews, and how to document and report findings on mobile personal devices using a bespoke online reporting form. Team Leaders also received training on their management and capacity building roles, and how to identify and escalate the most serious reports for follow-up, with an overview of how this would feed into FIFA’s human rights system, and interact with its event grievance mechanism.

“Through the training sessions, I was able to acquire a deeper understanding of human rights principles, and learned about effective strategies for raising awareness, advocating for change, and supporting vulnerable communities.”

Human Rights Volunteer, Lusail Stadium
The training programme benefited greatly from the involvement of representatives from the Office of UN High Commissioner for Human Rights (OHCHR), who offered core human rights education and training on human rights monitoring principles. OHCHR’s contribution added credibility to the HRV programme, and the office’s ongoing support for the HRV initiative will contribute much to its effectiveness going forward. OHCHR methodologies can usefully inform future HRV training and help ensure a coherent approach to learning that starts early, is grounded in a context analysis and needs assessment, agrees clear learning objectives, and develops a training design that emphasises practical activities and peer-learning.

“Mega-sporting events are planetary stages where human rights messaging can resonate and amplify in unprecedented ways – for instance, messaging on the participation and inclusion of persons with disabilities, the promotion of children’s rights, and opposition to racism and homophobia. This belief has driven the engagement of our office in this project and will continue to guide our efforts to strengthen human rights integration in mega-sporting events.

Elena Ippoliti and Mara Steccazzini, Office of the UN High Commissioner for Human Rights

Scenario-based learning

The HRV training included a brief discussion on the practical situations HRVs might encounter on the job. The HRV survey and Team Leader feedback suggested it would have been helpful to have had more opportunities to work through practical scenario-based examples prior to the start of the tournament, and to bond as teams before meeting in Qatar.

The HRV programme came together in a short time frame and expanded more rapidly than originally anticipated. While some basic human rights
theory and context around games time risks were necessary, better use could have been made of the experience and expertise of the OHCHR team, including in particular UN human rights training frameworks which stress the importance of scenario-based, issue-focussed activities. For example, with hindsight it would have been helpful for HRVs to have been able to work through how to handle the types of situations they would face on day one, and consider what to include or exclude in their daily reports, as this would have boosted the confidence with which HRVs were able to approach their interviews, and document their findings during the initial shifts.

Based on interviews, HRV feedback and CSHR observations, opportunities for ongoing and on-the-job peer training were limited for the HRVs. During the FAC 2021 pilot, HRVs received dedicated training during the tournament from security teams and others. Time constraints and other practical challenges associated with putting a brand new programme into practice at pace meant this did not happen at the FWC 2022. As a result, while it had always been the intention that Project Managers and Team Leaders would build the human rights capacity of HRVs and give feedback on ways to improve the overall quality and specificity of reporting needed for FIFA and required for its grievance mechanism, this in the end had to substitute for additional formal training sessions and opportunities for peer-learning as a wider group.

Time pressures also limited opportunities for on-the-go learning among Team Leaders. While Project Managers used a WhatsApp mobile phone chat group, and periodic face-to-face interaction with Team Leaders to offer advice on ways to strengthen reports and the triage process, regular catch ups did not happen given the intensity of the tournament schedule. Based on all first hand accounts, over the tournament there were just two group debrief sessions, which took place in response to operational challenges which meant the focus of the sessions was less on peer-learning and raising performance, and more on agreeing a new modus operandi, particularly with regard to interactions with security personnel. While informal off-duty conversations among the Team Leaders and Project Managers were invaluable, they did not adequately substitute for formal debriefs. Such briefings could have helped ensure teams were on-track and learning from each other, and would have assisted in checking that security precautions were being followed, and in bolstering team cohesion.

Risk sensitisation training will be an important element to add to the
HRV curriculum going forward. Time and other constraints meant the contextual element of the HRV training at FWC 2022 was limited, and as a result Team Leaders and HRVs did not always have the cultural insight or sensitivity they needed to handle the range of human rights challenges they would encounter that are specific to Qatar. As a result, HRVs were sometimes personally and emotionally unprepared for the kinds of situations that could arise. Examples are explored further below.

Despite a few shortcomings, the FWC 2022 HRV programme training and daily briefings from Team Leaders left a legacy of heightened awareness of human rights among the HRV pool. The programme also yielded clearer insights into the human rights issues to look out for at MSE venues. As such, it helped generate a bank of cases that can be used to inform the planning and preparedness of event owners and organisers in football, Qatar, and more broadly, and be used in more practical, scenario-based training in the future. Opportunities for additional follow-up with HRV alumni in Qatar, and ways to engage more fully with this new human rights-aware community are being considered by FIFA and CSHR.

Recommendations

Based on the experiences at the FWC 2022, the following are recommendations on training and capacity building for organisers implementing a HRV programme:

- **Offer scenario-based training.** Training should begin early and make use of self-paced e-learning options, with HRV selection contingent on completion of key modules. For HRV teams to hit the ground running and to strengthen team bonds, prior to the start of the event teams should work together through real-life scenarios and interview, observation, reporting, escalation and referral techniques; gain familiarity with particular venues, high-risk games and potential human rights pinch points; and cover anticipated and contextual human rights issues.

- **Build in event-time peer-learning opportunities.** As every sport event is different, HRVs, Team Leaders and Project Managers should receive continuous on-site training through daily briefings and issue-specific sessions on a rolling basis so the contingent can maintain awareness across emerging challenges. Team Leaders and Project managers should participate in regular debriefings so they can benefit from peer learning and collectively discuss and find solutions to emerging issues.
• **Collaborate in developing training with expert partners.** Training should conform to OHCHR human rights training and monitoring best practice, including a contextual analysis and learning needs assessment, agreed learning objectives, balanced theoretical and practical and peer-based instruction, and a training impact assessment. Training should be designed in collaboration with key partners and affected people to the fullest extent possible.

• **Provide risk sensitisation and integrate pastoral care.** All HRVs should receive ‘Mental Health First Aid’ training. Project Managers and Team Leaders - especially for multi-city events where they will take on greater responsibility - need additional training, for example, in areas like conflict resolution and de-escalation. Such training can be based on existing methodologies and programmes and delivered online in condensed formats.

• **Harness new learning for training and event planning.** MSE owners and organisers should use the body of practice and data gathered during the FWC 2022 to inform event planning, and use the bank of on-the-ground scenarios for future HRVs and Team Leader training.
KEY FACTS

- **78** HUMAN RIGHTS VOLUNTEERS
- **11** TEAM LEADERS
- **33** COUNTRIES REPRESENTED
- **64** MATCHES ATTENDED
- **29** DAYS OF OPERATIONS
- **+600** HOURS OF COVERAGE
- **20-30** INTERVIEWS PER VOLUNTEER PER MATCH
- **334** REPORTS ESCALATED BY TEAM LEADERS
- **1817** SUBMITTED REPORTS *
- **174** REPORTS FORWARDED FOR FOLLOW-UP ACTION +

* A majority of reports were positive on what was working well for fans and others

+ Reports escalated and referred for follow-up were often clustered
VENUES AND THE NUMBERS

LUSAIL STADIUM
13 Volunteers
258 Reports Filed

EDUCATION CITY STADIUM
8 Volunteers
334 Reports Filed

AHMED BIN ALI STADIUM
9 Volunteers
89 Reports Filed

AL JANOUB STADIUM
9 Volunteers
304 Reports Filed

AL KHOR

LUSAIL

AL RAYYAN

DOHA

AL WAKRAH

AL BAYT STADIUM
10 Volunteers
158 Reports Filed

STADIUM 974
7 Volunteers
56 Reports Filed

KHALIFA INT. STADIUM
7 Volunteers
111 Reports Filed

AL THUMAMA STADIUM
8 Volunteers
170 Reports Filed

FIFA FAN FESTIVAL
18 Volunteers
292 Reports Filed

OTHERS
45 Reports Filed
MATCHDAY ROUTINE

KO - 3
- Arrival at the stadium
- Meeting with the TL (30 min)
- Tour of the stadium to make observations

KO - 2
- Taking positions inside the outer perimeter
- Observing, interviewing & reporting

KO
- Report writing
- Social media monitoring
- HT: Interviews & Observations
- Break

FW
- Taking positions 15 min before FW outside the inner perimeter
- Observing, interviewing & reporting

FW + 1
- Report writing
- End of day meeting with the TL (virtual or in person)

FW + 2
- Going home

REPORTING CYCLE

Human Rights Volunteers reports to the Team Leader

Team Leaders brief Human Rights Volunteers about results, follow ups & trends

Team Leaders identify and escalate salient issues to Project Managers

Project Managers report to Team Leaders about actions taken, trends observed & necessary follow ups

Project Managers prioritise urgent cases & report incidents to Tournament HQ & relevant Venue Managers

Rights Up Close: A review of the Human Rights Volunteers programme at the FIFA World Cup Qatar 2022
STAKEHOLDERS INTERVIEWED OR OBSERVED BY HRVS

PROPORTION OF INTERVIEWED STAKEHOLDERS ADVISED TO USE FIFA’S GRIEVANCE MECHANISM
3.3 Programme operations
Monitoring coverage, staffing levels, and workload

MSE owners guard the privilege of accreditation to their events carefully, as this has cost, capacity and operational implications. For FWC 2022, this created pressure to restrict each individual HRV’s accreditation to just the one stadium to which they were assigned. At FWC 2022, this also limited HRVs to operating in the stadiums’ inner perimeter and main operational areas, but with no access to monitor human rights in VIP, Media, Broadcast, Hospitality or Competition areas.

HRV teams typically comprised one Team Leader and 7-10 HRVs per stadium (subject to venue capacity), with slightly larger numbers at the FIFA Fan Festival to allow for rotation as it operated daily. A clear majority of contributors to this review felt that within the constraints of the programme, the numbers of HRVs available (i.e. between 5 to 10 HRVs per shift allowing for different venue capacities) were sufficient to get the job done. However, contributors felt that the programme was operating with what should be considered a minimum workforce as documenting human rights concerns and abuses was compromised with any degree of absenteeism, especially during meal breaks when it was not possible to provide adequate cover. Importantly, as the tournament advanced and a handful of volunteers dropped out due to other commitments (which is common), this put pressure on the remaining volunteers in terms of volume of work and the lack of support available to those still in post. Ideally, better use could have been made of individuals from the reserve pool, but a hurdle that future MSEs will need to overcome is any inflexibility in the accreditation system, which made it hard at FWC 2022 for HRVs to switch venues at short notice to cover absences, or for reserve volunteers to be brought into action despite enthusiasm to take part and demand for their services.

“

The Human Rights Volunteer programme showed that any person can become a human rights ambassador and contribute to respect for human rights during a mega-sporting event. It is a legacy for other sporting events regardless of their location as human rights will always be impacted during such events’

Thomas Trier Hansen
Human Rights Volunteers Project Manager, FIFA
The Team Leader role was introduced for the first time at the FWC 2022 to ensure that a human rights expert was present at every venue; the role had not been needed for the FAC 2021 pilot where HRV numbers were much lower and the Project Manager could be present. Team Leaders helped deliver effective on-the-ground human rights monitoring at FWC 2022, but the role may benefit from refinement and will need to be tailored to future contexts. All contributors to this review felt the system might operate more efficiently with more than one Team Leader per team, with a division of labour for day-to-day HRV human rights training, monitoring social media for abusive messages, escalating serious human rights issues, referring urgent incoming reports for immediate action, and with the team management aspects of the role, including being on hand for HRVs during crisis situations and providing pastoral care.

“The FIFA Men's World Cup 2022 showed the potential and value of a human rights programme utilising the skills and expertise of human rights leaders alongside volunteer teams - this should be the starting point for a future staple of major sporting events worldwide.”

Joe White,
Co-Chair Three Lions Pride & Representative of Football Supporters Europe
Human Rights Volunteer Team Leader, FIFA Fan Festival
The two Project Managers were the lynchpin between the HRV programme and the FIFA Human Rights team. It had not been possible to fully pilot the role in advance due to the difference in scale between FWC 2022 and FAC 2021. Project Managers were tasked with being the main point of coordination between the HRV teams, FIFA, Sustainability Venue Managers and relevant Functional Area personnel; and ensuring reports were escalated and recommended actions communicated to the FIFA Human Rights team at the end of each day; and with providing supervision, training, and moral and emergency support to the entire HRV contingent. An already difficult job was made more arduous by the decision of the Project Managers to travel across the city to be physically present to support HRV teams at each shift. This resulted in Project Managers working extremely long days with little time off during the Group Stages. This schedule was eventually scaled back, but had knock-on implications during situations where greater Project Manager presence would have been helpful at the tournament operations headquarters for swift and coordinated follow up. The workload also meant formal training sessions, debriefs with Team Leaders and important opportunities for peer-learning were sacrificed. The Project Manager role will benefit from being reevaluated in line with the recommendations set out below, particularly for geographies that prevent an on-site presence.

Visibility, access and safety

Ensuring that HRVs were identifiable to all actors and that their role was clearly communicated across other FWC teams, particularly event security, was a key challenge for the programme. Operational shortcomings in this area were arguably the most serious matters impacting the project and all who participated. This was evident in a series of incidents with security that limited the ability for HRVs to fully implement their tasks and was a source of concern to many Team Leaders.

To situate the HRVs within the wider volunteer pool, FIFA decided that HRVs should wear the same uniform as all other FWC volunteers, and for their accreditation to identify them as “Sustainability Volunteers” rather than “Human Rights Volunteers”. The rationale was to preserve HRVs’ relative anonymity so that they could conduct interviews and observations without the term “human rights” possibly skewing the feedback they received, and in order to limit requests for comment by journalists, or potential aggression by fans and others with strong negative perceptions of human rights or related topics. Only Team
Leaders at the FIFA Fan Fest had accreditation that explicitly identified them as HRV Team Leaders. All others were indistinguishable from any other volunteer or HRV, which impacted their ability to assert their mandate.

FIFA’s Human Rights and Anti-Discrimination Team had sought to raise awareness about the HRV role with Venue Managers and other Functional Area personnel in the build up to the FWC 2022, but these efforts were not able to be executed to the extent planned. For a new programme this proved to be a problematic gap and many HRVs felt there was a widespread lack of understanding about the HRVs’ functions. Security and other workforce staff in particular seemed unaware of the specific tasks HRVs needed to fulfil, and their need for access to the stadium bowl before and during matches to observe fan behaviour and staff conduct, and to document verbal or physical abuse, violations of press freedom or freedom of expression on and off the pitch. Tasked with policing crowd control, and enforcing accessibility and exit channels, security personnel on numerous occasions demanded that HRVs vacate the stadium bowl, mistaking them - because of their uniform - for off-duty volunteers trying to watch matches. As a result, HRVs frequently had to justify their presence. This often made it challenging to fulfil the full scope of HRV duties.

It is important to note that security staff did not actively target HRVs, and most problems arose from the lack of HRV visibility alongside failures to cascade essential operational information to security personnel on duty. That being said, FIFA and the SC’s attempts to raise awareness of the HRV programme at daily tournament operations meetings, and a contingency plan to address the challenge of access initially had little effect. Security personnel were either not briefed or willfully continued to challenge HRVs, meaning at every shift HRVs were placed in the vulnerable position of having to explain their roles to security personnel. An element of racial profiling was also felt to have existed, with HRVs of South Asian and African descent more widely stopped by security staff.

The issue of volunteer visibility was of particular concern in three instances in which HRVs were photographed, followed by security guards, or had their accreditation physically removed and threatened with confiscation and eviction from the stadium. Matters culminated when one HRV, who - contrary to their training - photographed security forces in action and was met with verbal aggression. Together with their Team Leader - who was attempting to defuse the situation - they were verbally
harassed and detained by stadium security for three hours and held *incommunicado*. The Team Leader’s phone and personal photographs were later found to have been inspected by the police, an unnerving invasion of privacy.

“*Security were too strict with us and didn’t let us do our job. I felt unsafe and got detained by police when I was doing my job and the situation wasn’t solved in a professional way.*

Human Rights Volunteer, Education City Stadium

This case prompted high-level intervention from the SC and a rethink on HRV interactions with security personnel. It was decided to revise the approach to HRV visibility by providing Team Leaders with FIFA staff uniforms (which seemed to confer greater authority on the wearer when interacting with security), and HRVs being given hats that made them instantly recognisable in the stadium bowl. The new approach was reinforced by amended access directives specifically on the role of HRVs, and a system that saw stadium security leads notified daily of the names of HRVs on duty at any given shift. Over the remainder of FWC 2022 these steps proved to be effective. The intervention from the SC was decisive, and restored confidence among the HRV contingent.

**Communications & reporting**

The default means of communication between HRVs, Team Leaders and Project Managers during and between shifts were a series of WhatsApp mobile phone chat groups. The system was generally reliable at stadiums with strong wifi connectivity, but less so at the FIFA Fan Festival. This supplemented the formal HRV reporting app used to document HRV observations and interview findings, and doubled both as a way to raise urgent matters requiring real-time intervention by Project Managers or FIFA, and importantly as the principal means by which to check the whereabouts and safety of HRV personnel.
The reporting system that HRVs used to document and file their observations and interviews was effective and a clear improvement from the paper forms used during the FAC 2021. The process will benefit from further streamlining to ensure the reporting and escalation system better deliver the specific data needed by tournament organisers and relevant grievance mechanisms for follow-up, and filter out non-urgent matters from the triage process.

In future, the design and functionality of communication and reporting systems should include input from safe sport experts to ensure data protection, so that highly sensitive personal information, for example in sexual harassment cases, is only ever shared on a strict ‘need to know’ basis. At FWC 2022 the communication and reporting channels were not set up to provide a separate track for cases of an acutely sensitive nature, and arguably offered minimal privacy with respect to what was reported, with Team Leaders and Project Managers having uncensored access to every report, which may be excessive and inappropriate in some circumstances.

**Duty of care**

FIFA and the Project Managers took the issue of HRV safety and well-being seriously, and went to considerable lengths to foster and maintain a culture of mutual respect and common purpose among the contingent. This was born out in the fact that all HRVs and Team Leaders who contributed to this review were committed to the programme’s future success, with a majority wanting to take part again in the future. For most of the time HRVs were kept safe. One of the lessons for FIFA was the importance that accreditation processes play in HRV relations with security officials, a factor which was underestimated prior to the tournament. The cases of HRV intimidation, along with instances of sexual harassment experienced by HRVs on duty (see below for details), exposed gaps that will need to be rectified for future events. FWC 2022 organisers did however act to address wider issues of sexual and other forms of harassment affecting volunteers by sending an urgent reminder part way through the tournament for all workforce, including volunteers, to abide by the Code of Conduct and to report instances of harassment, especially of a sexual nature, making use of the complaints and grievance channels available as appropriate.

The FIFA Human Rights team had scenario-tested potential risks to volunteers, specifically in relation to working hours and harassment prior
to FWC 2022, but did not specifically consider risks to HRVs. A “Team Leader risk protocol” was also devised to facilitate regular check-ins with Project Managers and monitor their safety, but this was a last-minute addition and was not rolled-out, in part because the WhatsApp channels were thought to be sufficient. With hindsight, a connection might have been made between the risks identified for human rights defenders in FIFA's human rights salience assessment for FWC 2022 and the HRV role. The assessment flagged "appropriate security practices and use of force", "right to privacy", "arbitrary detention", "arbitrary interference", and restrictions on the "right to seek, receive and impart information" as significant risks for human rights defenders. While it should be recognised that the HRV initiative grew from a programme of a dozen people at the FAC 2021 to one more than seven times that size less than a year later, which was rolled-out at pace in an already challenging operating environment, in future it will be important to examine, and potentially strengthen, the due diligence in place for the programme.

The element of volunteers monitoring security staff performance - in a context where security provision had already been identified as a salient human right risk - should perhaps have provoked more questions and self reflection. FIFA responded by reminding HRVs to stop photographing security guards on duty, and insisting HRVs operate in pairs and check in at regular intervals with Team Leaders. Many Team Leaders however questioned whether the response could have been more robust. Several days before an incident where two HRVs were detained by police, it had already become clear to Team Leaders that HRVs were being intimidated by security personnel and potentially put in harm's way. In particular, a majority of Teams Leaders felt that local HRVs whose residency and right to live and work in Qatar hinged on their residency status, had the right to timely information about the potential seriousness of the risks to which they were being exposed in their interactions with security. It should be noted that no evidence has since come to light of any retaliation against HRVs working on the project.

The safety and security issues facing HRVs were symptomatic of some wider challenges facing volunteers at FWC 2022, with volunteers not always treated with the consideration expected. While MSEs are high-intensity professional operations, and all Project Managers and Team Leaders went into the programme expecting long hours and workloads, future HRV programmes could better consider how to model good practice on working hours. Attention will also be needed in future...
to ensure the safety and wellbeing of HRVs working long, and often emotionally demanding, shifts.

Recommendations

Based on the experiences at the FIFA World Cup Qatar, the following are recommendations on programme operations for organisers implementing a HRV programme:

- **Ensure adequate staffing.** Staffing numbers for Project Managers, Team Leaders and HRVs should be sufficient at every location to ensure HRVs can operate safely. This includes working in pairs, monitoring social media, and providing adequate coverage to allow for breaks and absenteeism, and to meet surge-capacity for high-risk matches/sessions over the duration of the event so HRVs can recharge and meet outside personal commitments, while maintaining ongoing emotional support for teammates.

- **Recognise and fulfil the duty of care.** Event owners and organisers have a duty of care to all volunteers, which requires additional measures for those with human rights responsibilities. Due diligence should be conducted to identify, prevent, reduce and account for how organisers will address any risks to the HRVs, with protocols in place so the whereabouts of every HRV is known, with clear steps to follow in case of emergency. Event organisers should secure written guarantees for HRV safety from relevant security providers/public authorities, and agree to cover any legal fees if HRVs are charged with offences in relation to their HRV duties. Human rights organisations that contribute HRVs should be alerted to any risks to their staff and kept apprised of their whereabouts and wellbeing.

- **Ensure visibility and access.** Visibility is essential to ensure HRV safety and effectiveness in their work. HRVs should have appropriate accreditation and be distinguishable from the main volunteer pool (for example with “Official Observer” armbands) so they can do their job unimpeded, whilst still commanding the trust of fans and other stakeholders. A subset of HRVs should have access to VIP, Broadcast, Media, Hospitality and Competition areas so no zone is exempt from human rights monitoring. Team Leaders should be readily identifiable and in communication with venue teams.

- **Raise HRV profile across operations.** All event owners, organisers and
official venue staff and event-related personnel that come into contact with HRVs within and outside official venues, in particular security, should be made aware of HRV roles and functions so they can perform their duties safely and without interruption. These actors should receive regular updates on the HRV programme as part of venue daily briefings.

- **Safe and secure communication and reporting.** HRVs need to be in ready and regular communication with key venue teams, including security, medical and accessibility. Communication and reporting systems should be secure, streamlined and deliver the relevant data needed for effective responses and use in remedy. Sensitive data and the privacy of persons whose human rights have been abused should be respected at all terms.
4. SUBSTANTIVE OBSERVATIONS

This section illustrates how, based on experience at the FWC 2022, HRV programmes can supplement event organisers' human rights systems to identify both good practice and challenges that need follow-up. Observations have been categorised in five areas that align with FIFA's own assessment of its most salient human rights risks at its events. These were: Accessibility & Inclusion, Anti-discrimination, Freedom of Expression & Press Freedom, Safety & Security, and Workplace rights. For each area we define the issue and highlight areas where, based on the FWC 2022 HRV programme, HRVs can also provide valuable insights and data for use in remedy and system adjustments.

In the majority of cases the findings in each category were positive, with fans and other stakeholders giving a portrait of a professionally run event, with good systems in place to keep fans safe and ensure a welcoming and efficient fan experience. Such findings provided valuable feedback on how the rest of FIFA's due diligence systems were performing when stress-tested during the event itself. A fundamental part of the HRV role, however, is to help event owners and organisers identify where they need to make real-time adjustments, or in more serious cases, ensure remedy is available for victims of alleged human rights violations.

Systems for reporting and lodging complaints supplement the process of human rights due diligence and are integral to compliance with the UN Guiding Principles. Remedy however is often not well understood in business and sport circles and can be met with alarm or discomfort. In reality the realisation of the right to remedy, and in particularly hearing directly from stakeholders on matters of concern is an asset. It is an extension to organisers' stakeholder engagement and enables organisers to better identify gaps in their systems, pinpoint how to address or plug them before matters escalate, while providing an evidence base for preventing more serious challenges arising in the future.

Seen in this light, we believe that the observations outlined in this section offer proof of concept for the programme. Importantly, they provide a taste of the kind of issues that HRVs can help organisers spot and
demonstrate to other event owners and organisers how and where a HRV programme can be helpful.

Accessibility & inclusion

Accessibility refers to the degree to which products, information and services among other things are available to people with disabilities, and is a precondition for people with disabilities to participate fully and equally in society; this includes in areas of cultural life, recreation, leisure and sport. The fundamental principle of inclusion of persons with disabilities extends to ensuring that sport and leisure spaces are accessible on an equal basis with others.

“I was proud that I helped a lot of people with different grievances and difficulties so am proud that I changed their lives for a moment.”

Human Rights Volunteer, FIFA Fan Festival

A wide range of steps were taken to ensure that tournament infrastructure and services were accessible for persons with disabilities and of limited mobility and HRVs gathered much positive feedback from fans and other stakeholders with disabilities on their experience at FWC 2022. At the same time, the HRV programme also helped identify areas for improvement and specific issues to escalate at the different stadiums.

In relation to accessibility, the HRV programme at the FWC 2022 demonstrated that it can be a viable instrument by which to identify good practice, and pinpoint specific or prevalent challenges and areas for intervention, follow-up or remedy. Examples include the:

• Ability of, and mitigations for, stakeholders with disabilities to cover sometimes long distances between transport hubs and parking drop-off points to stadium security gates, and from perimeters to stadium ticket gates and fan seating.
• Adequacy of mobility support services (including at night and in high temperatures), involving signage, availability and staffing.

• Appropriateness and sensitivity of approaches for handling ticketing issues that may sometimes lead to families or groups, including children, being seated separately.

• Levels of awareness or consideration for the diverse needs of people with disabilities and the potential medical consequences of some of their actions among tournament personnel, including for persons with invisible disabilities such as artificial joints, persons with neurodiversities and those needing to control medical conditions (e.g. asthma and diabetes).

• Respect for and/or the enforcement of protected spaces for disabled fans, including seating areas with fans congregating around disabled seating, wheelchair access routes to concession stands, merchandise stores and disabled toilets.

• Evenness of ground surfaces and safety of wheelchair routes.

In reflecting on the operational impact of the HRV programme at the FWC 2022, FIFA’s Human Rights team shared that information gathered by HRVs was an important source of data to constantly improve and adjust the delivery of accessible services during the event. In FIFA’s view, HRVs complemented information from surveys conducted by the venue-based teams at each match. As most of the reports from HRVs on the topic of accessibility were venue specific, the FIFA Human Rights team would forward the information to the relevant Sustainability Venue Manager, who led accessibility operations at respective stadiums, to assess the information considering operational circumstances and make adjustments as appropriate. According to FIFA, measures taken thanks to HRV reports included the relocation of accessibility assistance staff, the provision of enhanced security attention to clear protected areas, and upgrades to signage. The solid body of evidence HRVs were able to collect over the tournament helped achieve noticeable improvements over the course of the tournament in this area.

**Anti-discrimination**

MSEs owners, hosts and organisers have an obligation to address the risk of discrimination and hostility that any individual may face, meaning
that their events should foster inclusion and diversity, avoid exacerbating existing patterns of discrimination or provoking historical tensions between certain groups, while clamping down on all forms of hate speech or incitements to, and acts of, violence rooted in discrimination. At games time this encompasses, for example, equal access to event venues and local services (e.g. mobility and transport services), and equal treatment by service providers (e.g. security guards, medical providers and ticketing teams) and in employment practices (including the treatment of volunteers). For organisers of sports events, non-discrimination should underpin diversity and inclusion measures, accessibility support provision, LGBTQI+ safeguards, and protections for women and children, as well as equal treatment for other historically and/or structurally marginalised groups.

“HRV changed our way of thinking and [attitudes] towards others, it showed and reminded us that all human beings are equal and they deserve the same treatment.”

Human Rights Volunteer, FIFA Fan Festival

HRVs proactively interviewed fans and other stakeholders from diverse backgrounds to gain insights into people’s different experiences. This included asking explicit questions about whether members of the public had encountered or witnessed discrimination or unequal treatment of any kind. HRVs also stationed themselves for extended periods of time at individual security and ticketing gates and other locations to discern any patterns of discrimination or unequal treatment. In interviews many fans were positive about their experiences in and around official venues at FWC 2022, even when asked about racial and other forms of profiling. However, HRVs also identified situations and topics requiring further assessment and follow up by the FIFA Human Rights team.

In relation to the topic of anti-discrimination, the HRV programme at the FWC 2022 demonstrated that it can be a viable instrument by which to identify good practice, and pinpoint specific or prevalent challenges and
areas for intervention, follow-up or remedy. Examples include the:

• Degree to which persons of different backgrounds are treated equally by security personnel at gates and the prevalence of racial or other forms of profiling, for instance, in relation to patdown body searches, bag inspections, requests to remove certain items of clothing, and confiscations of non-prohibited items.

• Extent to which persons of different backgrounds are treated equally, and the prevalence of racial or other forms of profiling by staff within stadium precincts and the FIFA Fan Festival, including in stadium bowls themselves, for example in terms of double-checking certain fans' tickets, and the unequal enforcement of policies to clear accessible seating areas from general spectators, including by ticketless fans or those seeking a better view of the pitch.

• Equality of access to prayer areas between men and women and extent to which overcrowding in prayer areas is handled appropriately.

• Presence of discriminatory and abusive chanting and fan behaviour at matches, and skirmishes among fans in the stands following such discriminatory acts.

In reflecting on the operational impact of the HRV programme at the FWC 2022, FIFA's Human Rights team shared that FIFA and the other tournament organisers took a wide range of steps to prevent and address acts of discrimination. According to FIFA, HRVs helped assess the effectiveness of these measures. FIFA reported that the information provided by HRVs in relation to discriminatory practices supported interventions to re-sensitise security personnel about the need for equal treatment of everyone. Specifically, the HRV programme allowed FIFA to establish a general picture of the occurrence of such practices across sites by generating a critical mass of feedback, allowing FIFA to go beyond anecdotal evidence. As for discriminatory and abusive chanting, FIFA noted that it had deployed specialist observers to stadiums through a separate programme. Finally, FIFA noted that the HRV programme helpfully served as an additional safeguard to test whether relevant instances of discrimination may have gone unobserved through that specialised programme.
Freedom of expression & press freedom

Freedom of expression is the right to hold and express opinions freely without interference, and to seek, receive and impart ideas. It forms the basis of press freedom. Freedom of expression extends to all kinds of ideas including ones that may be offensive, except if the views expressed violate the rights of others, advocate hatred or incite discrimination or violence. Event hosts and organisers should ensure that individuals, journalists and media outlets have the unfettered ability to exercise their right to freedom of expression responsibly. This means maintaining a safe environment for exercising freedoms of speech, of the press, and to protest peacefully, and includes: crowd control measures, media permitting, sharing relevant information and guidelines with the public, and specific protections for the press to enable access to information, and the ability to report on events.

At games time, event organisers may distribute official materials to security teams on what items are allowed and what are prohibited in terms of flags, protest images, symbols or statements; with fans, for example, expected to seek permission in advance to bring flags above a certain size into official venues. Under these rules, items known to be offensive to any group are often prohibited. At FWC 2022, for example, all national flags, and banners and symbols in favour of human rights that arguably have a political connotation, such as rainbow items or specific protest slogans (e.g. “Women, Life, Freedom” widely used in solidarity with the women of Iran) were officially permitted by FIFA, while more overtly political slogans such as “Free Palestine” or “Free the Women of Iran” were not allowed.

HRVs were tasked with observing how journalists, as well as fans and other stakeholders wearing or displaying flags, t-shirts and scarves bearing slogans, were treated. While many of those interviewed had no complaints, HRVs also observed challenges with regard to freedom of expression and the enforcement of FIFA policies.

In relation to the topic of freedom of expression and press freedom, the HRV programme at the FWC 2022 demonstrated that it can be a viable instrument by which to identify good practice, and pinpoint specific or prevalent challenges and areas for intervention, follow-up or remedy.
Examples include the:

- Level of adherence by security staff to upholding policies and regulations regarding prohibited items including in relation to protest images, flags, t-shirts, armbands, scarves and banners.

- Extent to which fans face invasive searches, or have items perceived to be political or showing solidarity with certain groups (e.g. rainbow items in support of LGBTQI+ rights, or slogans in support of protest movements) confiscated at security gates as well as within stadium precincts.

- Degree to which an elevated police presence or more highly securitised environment at high risk games can lead to greater risks to fans, for example through excessive targeting of particular sets of fans or confiscation of protest materials, even where confiscations run counter to public assurances on the part of the event owner or organiser.

- Interference in filming and other reporting activities by media, in particular in relation to police interventions.

Clifford Chance is a proud partner of the Centre for Sport and Human Rights and was pleased to contribute to this innovative human rights monitoring programme. Along with a colleague I had the opportunity to be a Human Rights Volunteer at the World Cup which enabled us to support this new initiative, gain first-hand human rights monitoring experience, and obtain greater insight into some of the practical steps that sport organisers can take to put the principles of human rights due diligence into practice. New models like this will become increasingly relevant as event organisers, including those beyond sport, seek to practise more sophisticated stakeholder engagement, demonstrate greater transparency, and gather more granular data on the human rights impacts of their activities.

David Alfrey
Lawyer, Member of the Global ESG Board, Clifford Chance LLP, Human Rights Volunteer, Al Bayt Stadium
In reflecting on the operational impact of the HRV programme at the FWC 2022, FIFA's Human Rights team shared that FIFA took a range of measures to protect freedom of expression and press freedoms before and during the FWC. As part of that, FIFA referenced its policy to prohibit discriminatory, political and offensive slogans inside stadiums, whilst allowing for general statements in favour of human rights to be displayed. FIFA also recalled public assurances made to fans that it had reached agreement with event organisers in Qatar to ensure its rules on tolerance and inclusion would be followed, thus allowing, for example, the display of rainbow colours to signify pride in, or allyship with, the LGBTQI+ community. FIFA noted that HRV observations and feedback generated through fan interviews allowed FIFA to more fully understand the degree to which its policies on prohibited items were adhered to and base related interventions with host country authorities and security teams on a more robust level of data. Furthermore, FIFA reflected that the very limited reports on interference with media activities allowed FIFA to solidify its overall assessment that, with some minor exceptions, media were able to report freely from the event.
Safety & security

The right to life and security of person are fundamental human rights. Sport event owners and organisers work with public authorities to put in place security, policing and counter-terrorism measures to protect the public, with additional procedures to ensure child safety and to protect people’s privacy and personal data. This necessitates developing and following codes of conduct, and putting systems in place to ensure human rights risks do not fall through the cracks in the overlapping areas of responsibility between police, private security guards and event stewards. Common areas of concern at MSEs include intimidation at security checks and in and around official venues, breakdowns in crowd control, unequal treatment, racial profiling and inconsistency in security practices, sexual harassment and other forms of abuse or neglect, particularly involving women, children and other vulnerable or at risk groups.

FWC 2022 successfully avoided any major terrorist or life-threatening crowd control incidents, and the security operation was effective in de-escalating a number of altercations between fans. Many fans - including women - told HRVs they felt safe in Qatar during the World Cup, and believed that FWC 2022 provided a less threatening environment in and around official venues than some other major tournaments. Safety and security was however a salient risk area identified by FIFA before the start of the World Cup, and the performance of security personnel at official venues was an area that generated significant numbers of referrals to the FIFA Human Rights team for follow-up. It is important to recall however that the security personnel themselves were working long hours, some were contract workers with limited security experience, and many were tasked with policing fans, and items bearing slogans, in languages other than their own.

In relation to safety and security, the HRV programme at the FWC 2022 demonstrated that it can be a viable instrument by which to identify good practice, and pinpoint specific or prevalent challenges and areas for intervention, follow-up or remedy. Examples include the:

- Experience of fans and other stakeholders when going through security controls, including whether checks involve racial profiling or are considered unnecessarily intrusive or intimidating, for example through verbal or mild-physical aggression.
• Levels of consistency by security personnel across different venues in applying policies and procedures, and in their communication with fans, journalists and other stakeholders on what items are and are not permitted through security gates (e.g. large cameras and binoculars; flags, banners and slogans; and medical supplies, baby food and personal hygiene items).

• Appropriateness of measures to handle crowd control, including arising from situations where unticketed fans gain stadium access after hearing through unofficial social media channels where they may expect to be able to gain access without tickets, or otherwise aim to force their way into sites.

• Degree of safety felt by women, children and people from marginalised groups, and extent to which they are disproportionately sexually harassed, abused or feel uncomfortable as a result of their interactions with security guards, fans, volunteers and other stakeholders.

• Degree of safety felt by volunteers, and the extent to which they are disproportionately sexually harassed, abused or feel uncomfortable or unsafe when performing their duties.

• Extent to which supporters at high-risk matches are subjected to instances of intimidation and arbitrary detention by security forces, or have officially permitted protest items confiscated in an unjustified manner.

In reflecting on the operational impact of the HRV programme at the FWC 2022, FIFA’s Human Rights team shared that, as for any such event, FIFA and Qatar implemented far-reaching safety and security measures, working closely with other governments around the world. FIFA noted that reports from HRVs allowed FIFA to have a fuller understanding on how safe fans felt at the tournament, in particular through interviews conducted by HRVs. FIFA also noted a comparatively high number of cases reported to its event grievance mechanism as a consequence of HRVs recommending persons with concerns on safety, in particular as a consequence of harassment, raise these through formal channels. In FIFA’s view, this helped ensure that formal grievance processes were more widely utilised.
Workplace issues

All workers irrespective of their contract status, and if they work as volunteers or not, are entitled decent workplace conditions, including - but not limited to - regular and reasonable working hours and time off, occupational safety and health, and freedom from discrimination and all forms of harassment and unequal treatment in the workplace. Paid staff are entitled to an adequate wage, to join or form a trade union and engage in collective bargaining.

Worker rights were a major area of scrutiny in Qatar ahead of the FWC 2022 and were identified by FIFA as a salient human rights risk at games time. Although Qatar instituted a series of significant labour reforms, and the SC instituted Workers' Welfare Standards and engaged directly with international trade unions on joint inspections, workplace rights remained a salient human rights risk at FWC 2022.

Worker rights were formally the purview of specialised staff employed by the joint FIFA and SC labour inspection teams led by the SC's Workers' Welfare Department. As such HRVs were not explicitly tasked with gathering data on workers' experiences or making assessments on the experience of workers. HRVs did however make observations involving all categories of workers and volunteers, and where language skills allowed conversations to take place some HRVs did engage with a range of workers stationed at official venues (including concession stand workers, cleaning staff and stewards), mostly when they were approached by workers themselves.

In relation to workplace issues the HRV programme at the FWC 2022 demonstrated that it can be a viable instrument by which to identify good practice, and pinpoint specific or prevalent challenges and areas for intervention, follow-up or remedy. Examples include the:

"Knowing that every report would be a part of making a change, it made me more passionate.

Human Rights Volunteer, Al Bayt Stadium"
• Degree to which workers report challenges with their working conditions, including with respect to areas such as working hours, salary payments and fines for absenteeism, health and safety standards, availability and quality of food, water and toilet facilities, or quality of accommodation, as well as the workplace experiences of agency workers.

• Levels to which female volunteers report facing cat-calls, intrusive body searches and harassment, unwanted sexual advances, and sexual harassment.

• Adequacy of the duty of care shown to volunteers, including the extent to which volunteers enjoy decent working conditions, are protected from alleged bullying by supervisors, verbal aggression and sexual harassment from security staff, workers and fans, or experience alleged workplace racial discrimination.

• Full implementation of workforce health and safety measures in situations where volunteers, as well as fan experience performers, and security guards, are at risk, notably in the context of long hours in excessive heat and near loud sound systems with limited protections.

In reflecting on the operational impact of the HRV programme at the FWC 2022, FIFA’s Human Rights team shared that FIFA and the SC together took a range of measures to protect workers’ rights in the preparation and delivery of the tournament. For FIFA, the HRV programme at the FWC 2022 demonstrated that it can complement specialist labour rights inspection programmes, including any labour rights area workers would like to share feedback about, but that it cannot replace more specialised labour inspections. FIFA reported receiving a number of labour rights-related reports from HRVs and forwarding them internally for further verification and assessment through dedicated labour rights procedures. HRVs also witnessed swift action by the labour inspection teams responding to HRV reports.
The HRV programme at FWC 2022 made a significant contribution to overall human rights monitoring actions during the event, supplementing organisers' existing human rights due diligence processes in line with the UN Guiding Principles. The substantive observations of the programme illustrate the largely operational nature of the issues with which HRVs engaged and worked to observe, document and escalate.

A key component of any human rights monitoring project is to “plan and then produce a report based on their findings and experiences”\textsuperscript{14}, documenting trends and patterns identified through observations and interviews with key stakeholders. Publication of a review, such as this, therefore constitutes an important human rights monitoring function of the HRV programme and represents an area to strive for continuous improvement for future HRV programmes.

In sum, the HRV programme at the FWC 2022 met FIFA's expectations and provided an unprecedented opportunity for CSHR to develop its own expertise in this area, helping to shape further initiatives of this kind. As a new concept, the programme also lived up to many of the hopes of the participants, as well as those of UN, academic, legal and civil society partners that supported the programme. In particular, it was possible to achieve a high level of diversity across the programme in a context where opportunities for women, people from migrant backgrounds and other at risk groups are often not available. The programme delivered valuable data to tournament organisers, provided a warning system on important areas of risk to people, and created a construct for practical collaboration with CSOs.

As with any new concept, the HRV project was not without flaws. Necessary tensions arose among the contingent at times that played an important internal accountability function. Going forward, lessons from the experience in Qatar will inform work on topics from recruitment and training, to operations and the exercising of duty of care towards volunteers themselves. At FWC 2022, limiting the scope of the project to official tournament venues did not allow for monitoring across all games.
time risks that can arise at MSEs, for example in the area of child rights. Nor was it possible to monitor human rights impacts across volunteer or worker accommodation, or within certain restricted areas, including VIP sections, hospitality, media and competition areas. These are areas that will need to be considered for future HRV programmes.

As the observations of the programme show, HRVs unearthed important findings and provided evidence for investigations instigated by FIFA, along with data on systemic challenges where only anecdotal reports were previously available. Such data, and the levels of trust built and demonstrated throughout the programme will help to strengthen FIFA's due diligence and human rights systems for future tournaments. HRV findings however showed the limits of FIFA's leverage in some situations. Despite HRVs witnessing clearcut attempts by FIFA's Human Rights team to intervene on a range of issues to enforce their own policies, procedures and public reassurances, this appeared to come up against political decisions or security directives at a local level that were sometimes at odds with FIFA's guarantees. This presents wider lessons for future major sport event owners and for the field of MSEs and human rights.

It is not the role and responsibility of CSHR or the HRVs to prejudge how FIFA, or other future event organisers and hosts, make use of the data that HRVs gather. Making these trends and patterns available to interested stakeholders, however, can facilitate legitimate civil society debate. In time, independent reports publishing human rights observations from the games time phase of major sporting events will support external accountability and additional civil society investigations.

FIFA's decision to bring this programme to fruition is important and should not be minimised - it stands to leave a positive example for future sporting events. It was a significant move for a sports governing body to partner with human rights experts for a project of this kind, which now lays a foundation for further collaboration. This type of official partnership remains only one part of the solution, and space must always be maintained for the work of independent human rights defenders and investigators to do their work outside of and alongside official programmes.
The final word must go to the HRVs. This new human rights-aware community demonstrated unwavering enthusiasm and commitment to making a positive difference in a country where that is not always easy. Their ambitions for the future of the HRV initiative, and willingness to commit their time, energy and passion to making sport events safer, more inclusive, and more rights-respecting environments, should be recognised and applauded.

Any meaningful human rights due diligence process needs to constantly evaluate and enhance itself. This is even more important in relation to a mega-sporting event, where activities and therefore risks of adverse impact are concentrated during a relatively short and highly intensive period of time. The HRV programme implemented for the first time at a greater scale at the FIFA World Cup Qatar 2022 allowed us to hear directly from those the wider human rights efforts were designed to protect and provided an additional layer of data to learn about and reacting to issues.

We are extremely grateful for the dedication and enthusiasm of the diverse group of HRVs at the FIFA World Cup in Qatar, and for CSHR for its support throughout the process. We are pleased to see that other sports bodies are taking a close look at our experiences in Qatar and are contemplating implementing similar programmes at their events too.

Andreas Graf
Head of Human Rights and Anti-Discrimination, FIFA