GAMES TIME

PLANNING AND ACTING TO RESPECT HUMAN RIGHTS IN MEGA-SPORTING EVENTS
GAMES TIME
PLANNING AND ACTING TO RESPECT
HUMAN RIGHTS IN MEGA-SPORTING EVENTS

CITE AS
Centre for Sport and Human Rights, “Games time: Planning and acting to respect human rights in mega-sporting events” (April 2020).

ABOUT
Launched in 2018, the Centre for Sport and Human Rights is a human rights organisation for the world of sport. The Centre’s mission is to advance a world of sport that fully respects human rights by sharing knowledge, building capacity and strengthening the accountability of all actors involved in sport through collective action and by promoting and supporting the Sporting Chance Principles.

AUTHORS
This guide builds on the publication produced by the Centre for Sport and Human Rights (CSHR) titled: The Mega-Sporting Event Lifecycle - Embedding Human Rights from Vision to Legacy (2018), by elaborating on the specific nature of games-time risks. The guidance has been developed by the CSHR in collaboration with Ergon Associates Ltd (Ergon). Drafting has been led by Ben Rutledge, Macduy Ngo and Steve Gibbons of Ergon with oversight and input from Mary Harvey, William Rook, and Alison Biscoe of CSHR.

Ergon is an independent, director-owned business founded in 2005. Specialising in labour, human rights, and gender, Ergon provides consultancy services to a range of clients including sports federations, sporting event organisers, international companies, financial services, NGOs, international organisations, and development actors. Our aim is to promote positive impact by supporting clients to develop best practices and innovative activities in the field of human rights.

COPYRIGHT
© Centre for Sport and Human Rights Ltd and Ergon Associates Ltd, April 2020. All rights reserved. CSHR and Ergon permit free reproduction of extracts from this publication provided that due acknowledgment is given.
# TABLE OF CONTENTS

## ABOUT THIS GUIDE
- Purpose
- Scope of this guide
- Structure of this guide
- Definition of key terms

## INTRODUCTION: WHAT IS UNIQUE ABOUT THE DELIVERY PHASE OF A MAJOR SPORTING EVENT?

## 1. PLAN: HUMAN RIGHTS IMPACT ASSESSMENTS
- Identify activities related to delivery
- Identify and prioritise risks
- Identify and engage stakeholders
- Defining operational and functional roles and responsibilities

## 2. ACT: MITIGATING IDENTIFIED RISKS
- Example risks, mitigating measures, and opportunities
  - Discrimination
  - Safety and security
  - Public health
  - Labour rights and employment practices
  - Property, housing and adequate standard of living
  - Children's rights
  - Forced labour and human trafficking
  - Freedom of expression and press freedom
  - Irregular migration
# TABLE OF CONTENTS

3. GRIEVANCE AND REMEDIATION: ADDRESSING INCIDENTS AND PROVIDING REMEDY 40
   3.1 ESTABLISHING GRIEVANCE POLICIES AND PROCEDURES 42
   3.2 SCOPE OF A GRIEVANCE MECHANISM 43
   3.3 PROVIDING REMEDY TO A HARMED PERSON 43
   3.4 MONITORING GRIEVANCES 44

4. LEARN: LEGACY, LEARNING AND COLLABORATION 46

ANNEX I: EXAMPLE OF SIMPLIFIED RACI FRAMEWORK 49

FURTHER RESOURCES 50
   KEY STANDARDS, CODES AND PRINCIPLES 50
   OTHER STANDARDS, CODES AND PRINCIPLES 50
   GUIDANCE AND TOOLKITS 51
   RISK INFORMATION AND LEGAL INFORMATION 52
   OTHER RESOURCES AND CASE STUDIES 52
ABOUT THIS GUIDE

PURPOSE

This Guide is designed to support organisations and authorities involved in the final preparation and delivery of major sporting events in their efforts to ensure respect for international human rights standards. In the overall lifecycle of a major sporting event, the final six months (‘games time’) are critical not only to delivery of the event, but also to ensuring human rights are protected. This Guide helps organisers do this important work.

It will help those seeking to understand how to identify possible human rights risks beforehand, and assess any actual or potential adverse human rights impacts with which they may be involved. Risks and impacts are likely to be different depending on whether the event involves single or multiple days, single or multiple sports, or single or multiple venues (or cities). The risk will also vary where the venues or cities have hosted previous games or competitions of a similar scale and nature.

All too often, human rights analyses focus on risks and negative impacts without considering human rights opportunities and the potential for positive impact or legacy. Beyond discussions of risk and mitigation, this Guidance also seeks to explore opportunities for legacy, influence and lasting impact (see next page).
SCOPE OF THIS GUIDE

The Guide is focused on issues relating to delivery and operations in relation to the competition or games itself, rather than the conception, bidding process, design or construction phases of the event. It does not look at commercialisation or sponsorship, nor does it require organisers to have event sustainability or risk-management procedures already in place, however it will support the development of such procedures, and support thinking on what steps might be necessary in order to ensure smooth and successful delivery.

This Guide is not limited to any one type of sporting event or games; it covers a broad range of sporting events. The International Standard on Event Sustainability Management Systems (ISO 20121:2012) defines an event in broad terms as a planned gathering with respect to time and a place where an experience is created and/or a message is communicated.

While the Guide is broadly applicable to multiple types of events, it maintains a focus on ‘major’ or ‘mega’ sporting events. While there is no single, authoritative definition of a major or ‘mega’ sporting event (MSE), they usually possess a number of defining characteristics. They are often described as sporting festivals, organised by a specially created authority, and tend to be either a one-time event or recurring events of limited duration, with significant or international scale, and that generate and carry mass popular appeal and media interest.

Box 1. Positive impacts and Legacy

The benefits of successfully delivering a major sporting event can be political, social, cultural or economic in nature. Events can also promote human rights and social causes through the way that they are planned and delivered.

For example, consideration of mobility and accessibility issues should make for a more inclusive and positive tournament that is available to a wider range of people, both athletes and spectators. It may also bring about lasting change in society’s views of, and behaviour towards, persons with disabilities. This may boost participation of people with disabilities in sport and improve facilities and services that businesses and public services offer going forward.

There is also an increasing focus on the broader linkages between sport and development. The contribution of sport to the Sustainable Development Goals (SDGs) can include, among other things, promotion of health and well-being, or improvement and development of local infrastructure.
STRUCTURE OF THIS GUIDE

Identifying and addressing games time human rights risks requires significant pre-planning and stakeholder involvement to ensure that a diversity of viewpoints are captured, a broad spectrum of issues are incorporated, and responsibilities are properly allocated. A recommended approach is to follow a clear iterative process:

While this Guide applies the above framework to human rights risks during games time, it can be used during any stage of the MSE lifecycle to identify broader risks associated with a sporting event (e.g. during construction or with respect to sourcing).

Box 2. Definition of key terms and concepts used in this Guide

- **Affected Groups**: Refers to groups which may be susceptible to human rights risks (see relevant definition) and for the purpose of this Guide includes fans, journalists, workers, volunteers, athletes, and local communities.

- **Games time**: The final preparation and execution stages in the overall lifecycle of a major sporting event, including the delivery and operation of the event and the sporting competition itself.

- **Human rights risks**: Human rights risks refer to potential adverse or negative impacts on people’s lives. In the sports and human rights context this could include fans being subject to violence by security forces, limitations of press freedoms, unsafe working conditions or athletes experiencing racial abuse by fans to name a few. See also ‘affected groups’.

- **Legacy**: Refers to the long-term positive impacts of hosting an event or games which extend beyond the games time period. See also ‘Potential positive impacts’.

- **Mega sporting event (MSE)**: Sporting festivals organised by a specially created authority which tend to be either a one-time event or recurring events of limited duration, with significant or international scale, and which generate and carry mass popular appeal and media interest.

- **Mitigation**: For the purpose of this Guide, mitigation refers to an action that aims to reduce the probability of a human rights risk occurring, or which aims to reduce the severity of a human rights impact should it occur.
- **Positive impacts**: For the purpose of this Guide, positive impact refers to the benefits and opportunities which can arise from identifying and addressing games time human rights risks. This can include public campaigns to combat social challenges such as domestic violence or substance addiction; skills training and new and improved jobs; increased access to and participation in sports amongst minority groups; reduction in prejudicial attitudes; or greater press freedom. See also ‘Legacy’.

- **Remediation**: For the purpose of this Guide, remediation refers to the process of providing redress for a harm caused. It can include actions which counteract, or improve the effects of the adverse impact.

- **Salient Risks**: Something that is “salient” is prominent or important. In the human rights context, a company’s salient human rights risks refer to those risks that would cause the most severe negative impact through the company’s activities or business relationships. This concept of salience uses the lens of risk to people, not to the business, as the starting point.

- **Stakeholders**: For the purpose of this Guide, stakeholders are groups or individuals with a particular interest in the human rights considerations that arise during games time. It can include affected groups (see relevant definition) as well as organisations or individuals who can play a role in addressing human rights risks such as event organisers, government actors, or civil society.
INTRODUCTION: WHAT IS UNIQUE ABOUT THE DELIVERY PHASE OF A MAJOR SPORTING EVENT?

International interest in a major event is often accompanied by intense scrutiny on a host city or country, through both large numbers of visiting spectators as well as international media coverage. In order to create positive impacts and avoid infringing on other people’s rights during the delivery phase of the event, organising authorities will have to address a number of very specific and sometimes unique challenges.

CHALLENGES INCLUDE:

- **A sudden and large influx of visitors**, including players, officials, spectators and journalists. International sports events often attract a significant number of supporters who may not speak the local language, may be of different ethnic or cultural background, and who have different expectations and levels of preparedness for spending time in the host city or country. Handled well, this may help foster greater inter-cultural connections, diversity and a sense of inclusivity.
• The sudden influx of international travellers may test immigration control capacity. It may also generate tension with local communities if residents or visitors engage in antisocial behaviour or demonstrate prejudicial attitudes. Tensions may also arise between different groups of visiting spectators. A sudden influx of visitors to an under-prepared host city may have numerous unexpected environmental or social impacts.

• A large influx of visitors may also test the capacity of and put strain on local resources such as transport or medical facilities, places of worship, accommodation, hospitality and entertainment services and amenities and even communication services. If the host city is unprepared, this can leave residents struggling to access services and can also leave the host city vulnerable in the event of an emergency.

• The event may also test security measures undertaken to protect athletes, officials, supporters and communities. Increased policing, crowd control, disease prevention and anti-terror measures will likely be required, which involves intensive risk planning and cooperation between different authorities. This may itself result in additional measures being needed to prevent racial profiling, discrimination, arbitrary detention or repression of peaceful protest. The need for extra security measures can exacerbate existing social tensions in host cities and may place children at heightened risk of vulnerability.

• A major sporting event may also result in a sudden influx of workers and volunteers, some of whom may be inexperienced, under-trained, and unprepared for working in a new city or country. They may not all be formally contracted by or connected to event organisers. This may present further complications where workers and volunteers are unaware of local customs, labour laws or the expectations and demands of host communities or visiting fans. Such workers and volunteers may also be vulnerable to exploitation or poor working conditions.

• Hosting major sporting events may result in certain groups of people becoming vulnerable to new risks that stem from the issues identified above or other, unforeseen circumstances. This might include visiting workers, or local school children volunteering at or living in close proximity to event venues. Special consideration must be given to how and where major sporting events will impact on potentially vulnerable groups of people.

• The scale and prestige of major sporting events will likely attract journalists from across the world who travel to cover not just the event itself, but who also seek to cover issues connected to the host country or local communities. These may portray national or local authorities, social customs or legal regimes in a positive or negative light. Some journalists will use the events as a platform to document and highlight human rights abuses, corruption or social tensions.

• Temporary legislation is sometimes introduced which can negatively infringe on the day-to-day lives of local people. This can include new transport regulations impacting traffic and commutes or new security laws. Or they can be related to consumption, such as temporary legislation rescinding existing bans on alcohol in stadiums in Brazil during both the 2014 FIFA World Cup and the 2016 Summer Olympic Games.

It is critical to recognise, manage and mitigate risks that are associated with the delivery of events in order to ensure smooth functioning of the competition and the welfare of all stakeholders. Unforeseen consequences can emerge very suddenly, and managing risks may help avoid creating new (or contributing to existing) wider social tensions or conflicts.
1. PLAN: HUMAN RIGHTS IMPACT ASSESSMENTS

While the potential for positive and lasting impacts is significant, delivering major events almost inevitably brings some form of human rights risk. Where potential risks are not factored into planning and risk-management, both pre-event and during delivery, there can be negative impacts on athletes, workers, volunteers, local communities, journalists and fans (hereinafter ‘affected groups’). Some of the key steps for integrating risk-management into the planning and delivery phase of major sporting events are set out below.

1.1 IDENTIFY ACTIVITIES RELATED TO DELIVERY

Mapping key activities and locations where they will take place is the first step and helps determine areas of possible risk relevant to delivery at games time. Activities can include the obvious ones needed for the implementation of the games as well as supporting activities:
In addition, important but less tangible activities will include: marketing, the provision of internet and communications facilities, broadcast and government liaison – including in relation to free movement of athletes and fans.

**LOCATIONS**

In looking at the locations where activities will take place, these will include all venues and training centres formally connected to the event, as well as the external environment and locations where people will interact due to the event. This may include: hotels and other places accommodating visitors; local healthcare centres; schools and other educational establishments; cultural centres or places of worship that may be utilised by visitors; fan zones that may be situated away from venues or host cities; and transport corridors where supporters will travel through on route to venues or fan zones (and which also may then require further mapping of venues situated along such transport corridors). This can in turn involve third party food kiosks situated on roads leading to event venues, or hotels and facilities near popular transport hubs.

**1.2 IDENTIFY AND PRIORITISE**

Identifying and understanding human rights risks will help organisers develop a more strategic approach to managing these risks. Risk assessments involve proactively mapping actual and potential impacts on people based on the activities identified above, rather than reacting or responding solely to external pressures or waiting for unexpected incidents to occur.

Risk assessments should always consider the perspective of those whose human rights may be affected by the event. A high-level overview of potentially impacted groups and rights is included in the figure below, and can serve as a starting point when thinking about risk identification and prioritisation.
For every activity and location associated with the event, it should be asked how these impact people or groups, and particularly those who have been historically disadvantaged or are otherwise more vulnerable. Organisers may want to bring in representatives from affected groups at this stage to assist with the identification of risk, as they may offer differing viewpoints that can add value. This will also help organisers identify potential opportunities to promote positive impacts.

Identifying, defining and prioritising risks will require:

- **Developing an understanding of the human rights context** in a host country and/or cities with a focus on potentially impacted groups and individuals. This can initially be done based on desk research of publicly available information, and should seek to understand documented or known human rights risks from credible sources (e.g. recorded cases of unlawful police action against minorities, repression of journalists, labour law violations). Some recommended sources of information are included in the ‘Further Resources’ section of this Guide.

- **A focused assessment of regulatory and enforcement frameworks and practices.** This step involves reviewing objective and independent assessments of national and local laws and practice by relevant and credible stakeholders. The purpose of this exercise is to understand what risks are adequately addressed— or not—by existing systems of law and enforcement. Some recommended sources of information are included in the ‘Further Resources’ section of this Guide.
• **Prioritising risks** within a particular event’s activities by determining which risks are more likely to occur and which are likely to lead to the most severe harms to people. These risks should initially receive highest prioritization, to be further reviewed in the stakeholder engagement phase. Other risks may be a lesser priority, for instance where relevant laws are robust and enforcement regimes are known to be effective.

Engaging with stakeholders can inform the process of identifying, defining, and prioritising risks as described above. More information on engaging with stakeholders is found in section 1.3. When conducting engagement with stakeholders:

• Ensure that participants have the information and opportunities necessary to participate and contribute, and that the process allows for relevant ideas and views to be exchanged. This is especially relevant for stakeholders who represent affected groups, as well as the stakeholders who may be in a position to mitigate risk or provide remedy. It is important to respect the stakeholders’ social structures and preferred processes for dialogue.

• Consult with a broad range of actors. Extend the scope of consultations to obtain reliable and meaningful information. Do not limit this just to the communities living closest to venues and those most likely to be directly affected by an event. Broadly consider who may be affected (e.g. local communities, workers, citizens of the country); those who affect what happens (e.g. the event organising authorities, security officials, government authorities), and those who, based on their broader experience, know what may or will happen (e.g. NGOs, academics, national human rights institutions).

• Ensure engagement with internal stakeholders / event organising authorities is sufficiently robust to ensure the relevance and quality of the impact assessment. Dialogue with key internal actors allows for an enhanced understanding of the nature of event activities, operational phases, and likely impacts on different rights holders. This is essential in order to understand potential human rights impacts and to prioritise.

• Recognise the limits of stakeholder engagement. It does not automatically result in or represent a social license to operate. It does not mean that there will be no opposition to the event. And it does not negate the need for continued dialogue with affected stakeholders. It should enhance mutual understanding between parties on views, concerns and opportunities, and help direct mitigation measures.

• Analyse, prioritise and document key human rights concerns. Through the initial analysis and the stakeholder engagement process, a number of areas for further investigation may have been identified. Map out any event-related negative impacts and assess their likely severity on different groups of stakeholders. This process should include not only direct and immediate impacts but consider indirect and longer-term impacts. This could entail, for instance, the impacts of intense media scrutiny (and potentially criticism) of athletes, particularly younger athletes. It should also consider the actions of third parties benefitting from the hosting of the event which may be linked to unintended negative impacts through their operations, products, services, or relationships. Examples might include hotels hosting visitors to the event, and the extent to which facilities and services are accessible to individuals with disabilities.

• It is advisable to consider impacts from the perspectives of those who are experiencing them when analysing these impacts. Once impacts and risks have been determined, the objectives, targets and responsibilities for risk management can developed.
1.3 IDENTIFY AND ENGAGE STAKEHOLDERS

The next step for organisers is to engage those involved with event organisation as well as groups representing those potentially affected during planning and delivery. (This may have started in the risk assessment stage). In engaging stakeholders, incorporating the input of affected groups in particular is absolutely fundamental not only for understanding areas of possible risk, but also for identifying steps to prevent and mitigate.

Necessary steps to engage stakeholders include:

• Based on how the activities defined above can create risk, and based on risks identified, map all relevant stakeholders connected to the event, particularly those who may be affected, as well as those stakeholders who can play a role in mitigation or remediation (e.g. government actors or sports governance bodies).
• Seek to understand the expectations and needs of stakeholder groups, even if these expectations and needs have not been explicitly raised.
• Establish and maintain a procedure for engaging with different stakeholders, such as regular workshops or convenings.
• Responsibilities for specific roles in engagements should be properly assigned, communicated to and understood by all.
• Begin engagements with stakeholders. Convenings with affected groups in particular will enable a robust review of the risk assessment, reconfirming areas of concern or risk, identifying new risks, as well as possible solutions. Engagement should allow for an open exchange of ideas and views.
• Responsibilities for specific roles should be properly assigned, communicated to and understood by all relevant stakeholders.
• Organisers should document the engagement procedure and its outcomes.

Potential stakeholders and affected groups may include, but are not limited to:

Local communities. Include civil society, local businesses and industry associations, indigenous people and minority groups, consumer and environmental groups, organisations representing vulnerable groups in society.

Spectators / fans visiting event venues, including fan zones.

Contracted workforce - including both domestic and visiting workers, and worker representative bodies. Include volunteers involved in the event.

Workers contracted to third parties (sponsors, vendors, logistics etc) and worker representative bodies.

Venue and/or event owners, managing agencies, commissioners and sponsors.

Regulatory bodies including local authorities, police and social services, licensing authorities, central and municipal government.

The media.

Athletes / competitors and their teams, visiting officials and dignitaries.
1.4 DEFINING OPERATIONAL AND FUNCTIONAL ROLES AND RESPONSIBILITIES

It is critical that organisers ensure that the responsibilities for specific roles and duties are duly assigned and communicated. Using the risks identified and prioritisation described above, it is important to assign responsibilities for managing the response to each human rights risk. For instance, primary responsibility for managing potential risks that stem from the conduct of venue security services should lie with tournament security managers and senior management of the contracted security service provider. The contracting agency may then be tasked with ensuring that the capability of personnel implementing the risk mitigation plan is adequate, and that the necessary steps have been taken.

Through identifying and prioritising risks, it is possible that risks will come to the forefront that are relevant, but an event organiser will have limited leverage over mitigation actions. For instance, discriminatory visa rules imposed by host governments may be flagged as a relevant concern, however, as a matter of law, firmly fall within the remit of government agencies and immigration authorities. Tournament organisers should not shy away from entering into dialogue with government about the negative impacts of policies or laws, even if they are government responsibilities, since they create human rights impact associated with the event through the people harmed.

Azerbaijan and UEFA: HIV / Hepatitis confirmation on visa applications

Ahead of the 2019 Europa League Final in Baku, UEFA engaged with the government of Azerbaijan in relation to its e-visa system which required HIV / Hepatitis status confirmation. UEFA felt that the question was discriminatory and should not prevent fans from attending, and successfully requested that the government remove the requirement.


One approach to allocating responsibility can involve using a RACI matrix which allocates who is Responsible (i.e. implements mitigating measures), and Accountable, and who needs to be Consulted, or Informed in relation to a particular prioritised risk and response. A simplified RACI framework is included as Annex I of this Guide.

Event organising authorities should closely monitor and require reporting on the performance of risk management and sustainability practices. This will facilitate monitoring of risk mitigation work and allow for prompt action to be taken if unintended consequences do occur.
2. ACT: MITIGATING IDENTIFIED RISKS

In order to ensure respect for human rights, organisers must have in place a process to effectively manage and mitigate all salient risks identified.

While it is impossible to eliminate risk entirely, the likelihood of negative impacts occurring can be vastly reduced through appropriate planning and action. Risk management is an essential part of any major event and will also allow organisers to react quickly and provide a coordinated and measured response when unplanned or unforeseen issues inevitably arise.

Set out below is an illustrative set of examples of steps that can be taken by organising authorities and other relevant stakeholders to manage risk. Note that it is not an exhaustive list of measures, but highlights some possible priorities.

2.1 EXAMPLE RISKS, MITIGATING MEASURES, AND OPPORTUNITIES FOR POSITIVE IMPACT

The following 18 pages set out a range of risks, mitigating measures, actors and opportunities for positive impact in relation to: discrimination; safety and security; labour rights and employment practices; children’s rights; forced labour and human trafficking; freedom of expression and press freedom; and irregular migration.
DISCRIMINATION

Includes discrimination in employment practices, access to event venues and access to local services.

OPPORTUNITIES FOR POSITIVE IMPACT

Promote tolerance and celebrate social diversity.

Encourage greater awareness and understanding of different protected characteristics and minority groups.

Greater awareness of businesses, community groups and local residents on legal standards and accepted international norms related to prohibitions against discrimination (particularly important where domestic legislation is weaker than international standards).

Access to employment and local services for minority groups may improve; incidents of discrimination may decrease.

POTENTIALLY AFFECTED STAKEHOLDERS

- Directly and indirectly contracted workers, supply chain workers, staff connected to sponsors, security personnel, third parties or vendors who may have no formal connection to event organisers
- Local residents, particularly those from minority groups or who have experienced discrimination previously
- Spectators that are vulnerable, from ethnic minority groups, or who possess characteristics that may trigger discrimination from local communities or visiting spectators (i.e. indigenous persons, disabled persons, LGBTQ+ individuals, women)

POTENTIALLY RESPONSIBLE AUTHORITIES

- Event organising authorities
- Local government authorities
- Businesses and industry associations
- Transport providers
- Local school and community groups
- Trade unions and civil society organisations
EXAMPLE MITIGATING MEASURES

Ensure organising authorities and agencies, as well as service providers, sponsors and other contracted businesses are aware of national laws as well as international standards which prohibit discrimination and on what basis (through provision of information and training where necessary).

Provide training for local authorities, businesses, industry associations, security personnel and others on the importance and value of diverse workforces and ensuring a harm-free event environment.

Ensure contracts and codes of conduct for service providers, business partners, hospitality and hotel providers include specific clauses defining and prohibiting discrimination. This may include stipulation of the need for a corporate equality policy implemented by contractors.

Ensure contracts and codes of conduct require service providers, businesses and other relevant organisations to educate their own workforce on i) applicable standards (which may differ from those of their own country), ii) how to respond if they become aware of discriminatory practices, and iii) how to access complaint procedures and any necessary accompanying support.

Establish an independent, transparent and effective grievance procedure that allows athletes, spectators, officials or other individuals to submit complaints and that provides efficient recourse to remedy. Respond to any evidence or complaints of inappropriate behaviour promptly and confidentially.

Urge sports governing bodies to promote diversity and non-discrimination, to enforce any existing commitments to combat discrimination, and to actively promote the rights of women and other marginalised or vulnerable groups.
Outdated laws and policies pertaining to freedom of expression, assembly and association may be revised to align with international standards.

Police and security personnel receive training that improves practices around effective policing, surveillance, and crowd control. This may facilitate hosting of future major events more safely and with less reduced spending on training. Community focussed policing/security may bolster community relations and social cohesion.

Investment in new equipment such as crowd control barriers, public surveillance cameras or signs are available for future major events.

POTENTIALLY AFFECTED STAKEHOLDERS
- Competitors / athletes
- Spectators and visiting officials
- Local residents living or working in close proximity to event venues, including children and others at heightened risk of vulnerability such as those who are homeless

POTENTIALLY RESPONSIBLE AUTHORITIES
- Police and other State law enforcement agencies
- Private security firms providing personnel at venues or related event venues such as fan zones or transport hubs
EXAMPLE MITIGATING MEASURES

Ensure organising authorities, police and security firms are fully aware of existing legal standards pertaining to anti-terror measures, crowd control, arbitrary detention and unlawful repression of peaceful protestors. This may include new primary legislation that is often enacted in the lead up to major international events, particularly where a host country holds such an event for the first time.

Consider requiring contracted security firms to commit to the International Code of Conduct for Private Security Providers (ICoCA). The Code provides standards and principles for the responsible provision of security services and covers both conduct of personnel and management and governance of companies.

Devise and promote a clear policy on scope of freedom of speech in and around event venues, including consideration of free speech zones in contexts where legal or practical restrictions exist. Seek from the Government an explicit assurance that any existing rights to freedom of expression and freedom to protest peacefully will not be suspended during the event.

Work with government agencies and law enforcement to ensure that police and relevant authorities recognise the right to protest around the event, as well as applicable limitations (i.e. it does not extend to violence or other actions likely to breach public order or infringe the rights of others).

If protests are anticipated, consider setting up a designated safe space where peaceful demonstrations can be held. This does not permit unreasonable and unlawful restrictions on a protest. However, it may encourage protest organisers to hold demonstrations in places that limit disruption to vital public services.

Devise and disseminate clear rules on tolerated behaviours in and around stadiums. Ensure police and security personnel receive training on free speech and incitement to violence or threatening behaviour. Newly recruited officers and visiting spectators may be unaware of applicable standards.

If groups of local or visiting spectators are anticipated to engage in anti-social behaviour, consider a public awareness campaign focused on tackling prejudice and respecting cultural differences. Provide information to visiting spectators and officials in and around event venues, as well as examples of where certain types of behaviour, such as racist, sectarian or homophobic chanting, will be deemed unlawful by authorities. Efforts can be focused on particular groups of supporters and work can be undertaken in partnership with sports federations or other organisations in different cities/countries.

Police and security personnel receive training on crowd control and management in order to improve and secure the safety of visiting spectators.

Installing public surveillance cameras can increase public safety & help cut crime rates. Surveillance programmes must have the necessary safeguards and oversight procedures in place to prevent racial profiling & infringements on the right to private & family life, or to free speech.

Given the potential for use of the event as a platform to further a particular political or environmental cause, re-assess civil and criminal procedures to avoid unnecessary conviction of activists or spectators. Establish and implement a clear protocol for dealing with protestors who disrupt the event and/or public services such as transport.

Anticipate where over-crowding may occur, and to avoid or address extreme over-crowding at venues or transport hubs, deploy computer modelling to assess crowd movement, to identify health and safety issues.
PUBLIC HEALTH

This includes sports’ role both in promoting positive public health messaging and in responding effectively to public health crises, which, for example in the case of severe disease outbreaks, may require postponement or other significant outcomes for sporting events.

Considerations should be given to how:

- A major sporting event can be used to support public health messaging around health and well-being.
- Capacity of medical facilities and staff to respond to a possibly higher volume of ill people.
- Health and well-being of athletes, fans, vendors and others attending the event.

OPPORTUNITIES FOR POSITIVE IMPACT

Public health initiatives to encourage members of the general population to lead healthy, active lifestyles can be enhanced around Games time.

Such initiatives encouraging people to adopt more active lifestyles can also encourage participation in organised sport, and can inspire the next generation of athletes.

Medical infrastructure, including hospitals and technology can be upgraded as part of investment into the city around Games time.

POTENTIALLY AFFECTED STAKEHOLDERS

- Competitors / Athletes
- Spectators and visiting officials
- Workers, in particular vendors operating in stadiums
- Local residents living or working in the host city, particularly children, as the ultimate beneficiaries of improvements to public health

POTENTIALLY RESPONSIBLE AUTHORITIES

- Local and national government agencies, in particular the Department of Health (or equivalent)
- Medical institutions, including hospitals and medical schools
- Schools and local sports authorities
EXAMPLE MITIGATING MEASURES

Ensure local organisers consult local government, schools, sports clubs and other relevant stakeholders on how to message around public health initiatives, and develop implementation strategies to ensure they reach the appropriate audience (for example, messaging to a child will need to be different to messaging to the general public).

Develop protocols in cooperation with health officials, athletes and other stakeholders for how to respond in the event of a disease outbreak or other public health crisis, including ensuring that there are processes for preventing the spread of a disease and that the health and well-being of affected people is the priority.

Work with local government and hospitals to ensure they are prepared and have enough capacity to respond in the event of an emergency, be it from increased illnesses due to a disease outbreak, or injuries resulting from, for an example, a terrorist attack.
LABOUR RIGHTS AND PRACTICES
Core labour standards, as outlined by the ILO, should be adhered to by event organisers, contracting parties & third-party employers who may be used to sell products or services.

OPPORTUNITIES FOR POSITIVE IMPACT

Greater awareness of and respect for applicable labour rights by industry associations and individual businesses, which may also increase opportunities for future event hosting.

Healthier, safer workplaces, which may also lead to increased productivity and improved provision of goods and services to local communities.

Complaint procedures may be maintained post-event to facilitate grievances.

Opportunity for new support mechanisms to address victims of human trafficking.

POTENTIALLY AFFECTED STAKEHOLDERS

- Workers contracted to businesses who have a formal relationship with and are contracted by event authorities
- Workers contracted to third parties who do not have a formal relationship with event authorities
- Uncontracted, informal workers

POTENTIALLY RESPONSIBLE AUTHORITIES

- Industry associations
- Local authorities responsible for licensing (permanent and temporary) business permits
- Event organising authority licensing merchandise, food and other products sold on and around event venues
- Event organising authority contracting service providers and sponsors
- Government labour inspectorate
- Trade unions
EXAMPLE MITIGATING MEASURES

- Develop an independent and transparent grievance procedure specifically designed to facilitate complaints by workers, including uncontracted or third-party workers.

- Ask employers to exhibit information on applicable labour standards such as working hours and minimum wages. Ensure this includes information on complaint procedures available to workers and in the language or workers.

- Liaise with labour inspectors to request they inspect vendors around event venues including temporary sites and informal workplaces.

- Provide police and security personnel training on identifying labour rights abuses and responding in an appropriate manner that puts the rights of potential victims first.

- Work with immigration officials and court officials to ensure awareness of protocols and ethical standards on processing undocumented workers who may have been subject to violence or other labour rights abuses.
PROPERTY, HOUSING AND ADEQUATE STANDARD OF LIVING

Consideration should be given to a range of possible issues including:

- Housing, land and property rights not being respected.
- Inadequate housing provided in informal settlements.
- Forced evictions.
- Homeless shelters being improperly resourced and cannot cater to demand.
- Indigenous lands and cultural rights being insufficiently protected.

**OPPORTUNITIES FOR POSITIVE IMPACT**

- Improved social housing provided to local families / communities in need.
- Upgrading of informal settlements and provision of adequate housing to communities in need.
- Better protection and public awareness of indigenous lands and cultural practices. Create lasting, positive images of indigenous groups.

**POTENTIALLY AFFECTED STAKEHOLDERS**

- Indigenous groups
- Homeless communities, including street children
- Inhabitants of informal settlements
- Local communities who stand to benefit from construction of additional housing in the area

**POTENTIALLY RESPONSIBLE AUTHORITIES**

- Housing associations and Council / Government housing authorities
- Ministry or Departments of Government who have jurisdiction over protecting indigenous rights
- Ministry of Interior or equivalent who have jurisdiction over informal settlements and support for homeless shelters
- Homeless shelters and charities that support homeless people
- Courts / public officials who process and implement eviction orders
EXAMPLE MITIGATING MEASURES

Review regulations pertaining to housing, land and property rights. Design a rights-based approach to dealing with homelessness in areas around event venues so as to avoid forcibly removing or clearing homeless people from vicinity of venues. Work with local homeless shelters and charities to review practices and provide additional resources where required.

Consider investing in upgrades of informal settlements in areas around event venues. Where clearances are necessary and have been permitted by law, ensure relocation sites are ready to provide adequate housing. Avoid forced evictions; engage with residents of informal settlements to agree on suitable alternatives that they consent to. See the UNOHCHR’s Right to Adequate Housing Toolkit.

Engage directly with local or neighbouring indigenous communities regarding any use of or impact on their ancestral lands. Work to ensure their land and cultural rights are respected. Promote understanding and positive images of indigenous cultures where appropriate with organising authorities to generate public awareness of rights and potential tensions. Provide police, security personnel training on identifying labour rights abuses and responding in an appropriate manner that puts the rights of potential victims first.

Work with immigration officials and court officials to ensure awareness of protocols and ethical standards on processing undocumented workers who may have been subject to violence or other labour rights abuses.
Rights of children are specifically recognised and protected through new policies, regulations and practices.

Improved education and improved health for local children. Reduced child obesity.

Children in local areas provided greater opportunity for self-expression and self-development; improved access to sporting facilities and events.

Healthy, competitive child athletes who raise profile of the event. Young people working in safe, lawful conditions benefit from new jobs, and skills development opportunities.

**CONSIDERATION SHOULD BE GIVEN TO A RANGE OF POSSIBLE ISSUES INCLUDING:**

- Aggressive corporate marketing aimed at children.
- Unsafe & exploitative working conditions.
- Child athletes facing harassment by abusive fans (at venues and online), and invasions of the right to privacy (arising for instance from irresponsible media intrusion).
- Undue pressures on physical and mental health stemming from excessive training or doping.

**OCCURRENCES FOR POSITIVE IMPACT**

**POTENTIALLY AFFECTED STAKEHOLDERS**

- Child athletes, volunteers and spectators
- Child labourers (including those working lawfully and those potentially being exploited)
- Children living in the vicinity of venues

**POTENTIALLY RESPONSIBLE AUTHORITIES**

- Host city child protection agencies
- Visiting competitor teams and sporting associations that have a mandate for supporting (child) athletes
- Police and security officials staffing event venues and transport hubs
- UNICEF and specialist charities or NGOs that provide tailored expertise and support on child protection issues
- Local schools & colleges
EXAMPLE MITIGATING MEASURES

- Provide space for the voices of children to be included within stakeholder consultation processes.

- Ensure children’s rights are part of risk assessment and mitigation plans (even where certain risks aren’t highlighted by children).

- Organising authorities should aim to put specific child safeguarding systems in place to protect young spectators, athletes and volunteers. This might look at venue safety, and protection from violence and abuse, as well as mental health issues.

- Include child rights standards like the UN Convention on the Rights of the Child and relevant principles in the wider risk management process.

- Use the event to promote healthy eating and the importance of education with local schools and visiting children. Social campaigning through media and/or community outreach.

- Engage with regulators and assess online and media advertising targeting children. For example, consider introducing timing restrictions on adverts for foods high in fat, salt and sugar; and prohibit advertising of alcohol aimed at teenagers/young adults.

- Engage with visiting sporting associations regarding anti-doping measures, and ensure all athletes have been briefed about procedures and have access to chaperones as appropriate.
FORCED LABOUR AND HUMAN TRAFFICKING

Consideration should be given to trafficking or forced labour associated with the event, which can include trafficking for labour or sexual exploitation.

OPPORTUNITIES FOR POSITIVE IMPACT

- Regulatory framework in place to tackle and prevent trafficking and forced labour, with mechanisms developed that encourage compliance with international labour standards.
- Local people and visiting labourers work in safe, lawful conditions and benefit from new jobs, and skills development opportunities.
- Business’ awareness of and strategies to prevent forced labour and trafficking improved.

POTENTIALLY AFFECTED STAKEHOLDERS

- Workers from local communities and visitors engaged in permanent or temporary, formal or informal employment
- Vulnerable women, men and children susceptible to trafficking

POTENTIALLY RESPONSIBLE AUTHORITIES

- Police and related local authorities
- Ministry of Interior / Home Office (visa and Immigration Department, Border Force, Immigration Enforcement, National Crime Agency etc)
- Business associations and contracted commercial partners and sponsors
- Uncontracted businesses operating in vicinity of event venues or transport hubs
- Healthcare and Social Care providers
- Trade unions
- Homelessness charities and shelters, and anti-slavery organisations
Ensure contractual clauses are inserted with suppliers, contractors, sponsors and all other commercial partners obliging them to identify and combat risk of forced labour and trafficking.

Consider methods to assess and vet the policies and practices of contractors or agencies supplying cheap labour, hospitality workers, companies providing food and beverage products, and event merchandise and others deemed to be high-risk.

Work with suppliers, contractors, sponsors, security firms and other relevant commercial or event partners to ensure staff are aware of how to spot signs of forced labour and where to report it. The ILO Indicators of Forced Labour as well as Sedex indicators may be instructive here.

Provide support to suppliers, contractors, sponsors, security firms and other commercial business partners on how to conduct their own due diligence to prevent serious labour rights abuses. The ETI Base Code on Modern Slavery provides practical guidance for companies.

If and when companies breach contracts or are implicated in rights violations, investigate and take prompt corrective action, working with relevant government agencies to ensure remediation and full protection of victims. A National Referral Mechanism or equivalent may be in place, providing a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Work with homelessness and anti-slavery organisations, in partnership with local authorities and police, to raise awareness among the homeless population about the risks of exploitation.
FREEDOM OF EXPRESSION AND PRESS FREEDOMS

Consideration should be given to possible issues including:

- Media reporting censored and the rights of journalists not being respected.
- Public rights to information and freedom of expression not being adequately protected.
- Athletes, spectators and community members are not protected from abusive content (e.g. on social media) such as hate speech or incitement to violence.

OPPORTUNITIES FOR POSITIVE IMPACT

- Positive coverage of host city/country boosts tourism and inward investment.
- Raised awareness about human rights and other social issues in the host city/country.
- Improved protections for journalist covering corporate abuse, corruption or other politically sensitive issues.
- Empowered local journalists / media orgs.

POTENTIALLY AFFECTED STAKEHOLDERS

- Journalists
- Human rights defenders
- General public / media audience, domestic and international
- Athletes

POTENTIALLY RESPONSIBLE AUTHORITIES

- Journalists and media orgs and institutions
- National press / media regulator
- Independent monitors of press freedom and NGOs who can provide support (e.g. Freedom House or ARTICLE 19 and their domestic partner orgs)
Monitor use of anti-terror legislation which unjustly deters, detains or punishes journalists covering politically sensitive issues. Work with relevant press regulator and anti-terror agencies to ensure media reporting is unrestricted and that judicial harassment of journalists does not occur.

Liaise with journalist and freedom of press civil society organisations to devise responses and strategies of freedom of expression.

Provide visiting journalists and / or media orgs and institutions information on any domestic legal restrictions on free speech.

Consider supporting media training and provision of insurance or equipment to keep journalists safe, particularly if certain event venues are in areas considered high risk. This is especially important if visiting journalists who may be vulnerable to discrimination or abuse are likely to be covering the event. The Committee to Protect Journalists (CPJ) Safety Guide is a valuable resource.

Support local / domestic media organisations (rather than focusing largely on international media orgs), issue all press releases in appropriate languages, and have linguistically appropriate spokespeople for the event.

Develop and promulgate a clear policy for journalists permitting reporting of sport with politics and other issues.

Monitor abusive online (and potentially unregulated) content that may cause distress to athletes, spectators or others. Work with law enforcement agencies and social media companies to tackle threatening behaviour.

Work with broadcasters (i.e. covering stadium events), to try and identify racist chants, taunting, or banners, and to restrict broadcasting of highly offensive messaging. Resources produced by FARE on discriminatory symbols and discriminatory practices can be useful.

Ensure that journalists whose rights are infringed have access to effective remedy (and legal support/aid where necessary). Short-term issues (such as denials of accreditation or access to events) must have a quick, well-known grievance route. Providing reporting mechanisms, such as the International Olympic Committee (IOC) Reporting Tool for Press Freedom Violations, can also be considered.
Laws and policies pertaining to the arrival and presence of asylum-seekers and refugees are in line with international standards and appropriate for national context.

Improved public understanding of the vulnerabilities and rights of refugees and asylum seekers.

Refugees and asylum seekers integrate more fully into society.

OPPORTUNITIES FOR POSITIVE IMPACT

POTENTIALLY AFFECTED STAKEHOLDERS

- Refugees, asylum seekers
- Victims of trafficking (see also forced labour and human trafficking above)

POTENTIALLY RESPONSIBLE AUTHORITIES

- Police, Immigration enforcement, Border Force, personnel working in reception facilities, child protection services
- Members of the judiciary / immigration and asylum tribunals
EXAMPLE MITIGATING MEASURES

- Review asylum and refugee policies and practices in the context of the likely movement of large numbers of people both into and within the country. Work with relevant government agencies to align asylum and refugee policies with international standards (as set out by UNHCR).

- Consider introducing temporary visa rules for visiting spectators and ensure they are non-discriminatory.

- Work with anti-terror authorities to assess balance between the need to ensure free and mass movement of people, and addressing any genuine concerns on security.
3. GRIEVANCE AND REMEDIATION: ADDRESSING INCIDENTS AND PROVIDING REMEDY

Even where organising authorities, host governments and businesses do their utmost to enforce relevant human rights, labour and environmental standards, negative human rights impacts may still result from the delivery of a major sporting event.

What differentiates responsible event organisers is how they respond to such incidents, the level of engagement with those who have been harmed, and the commitment to providing suitable remedy. This may require a shift in mindset amongst organisers and businesses, moving from a reactive approach to one that focuses on prevention and proactive responses.
Affected groups may face a variety of different challenges or rights infringements. Some will be day-to-day issues that can be handled through effective systems within the stadium, workplace or elsewhere. These may be unintentional or inadvertent impacts that can easily be corrected or remedied through apology or adjustment of systems. More serious issues will test organisers’ remedial strategy and may require the involvement of multiple stakeholders, including fans groups, diplomatic representation, communities, local criminal or civil justice systems, or trade unions.

Event organisers should therefore develop a grievance procedure with an escalation process that allows complaints to be captured, investigated or mediated and for remedial measures to be developed and implemented when appropriate. A typical grievance and remedy sequence may involve:

**FIG 3. EXAMPLE GRIEVANCE AND REMEDY SEQUENCE**

<table>
<thead>
<tr>
<th>Reception of Complaints</th>
<th>Can be received through multiple avenues such as written complaints, telephone hotlines, or online systems. The requirements for submitting a grievance should not be unduly formal or strict.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assessment</td>
<td>Seeks to understand whether the grievance falls within the scope of the mechanism. This is discussed further in section 3.2 below.</td>
</tr>
<tr>
<td>Investigation</td>
<td>Involves understanding the nature of allegations, factual underpinnings of a grievance, and what remedy is being sought. It needs to be determined whether remedy should be provided – either due to a breach of policy or due to broader considerations such as fairness.</td>
</tr>
<tr>
<td>Remediation</td>
<td>Can include apologies, rehabilitation, financial or non-financial compensation, punitive sanctions (whether criminal or administrative, such as fines), and the prevention of further harm.</td>
</tr>
<tr>
<td>Monitoring</td>
<td>Should strive to ensure that grievance procedures are effective. This is discussed further in section 3.4 below.</td>
</tr>
</tbody>
</table>

Remediation refers to the processes of providing remedy for an adverse rights impact and the substantive outcomes that can counteract, or improve, the adverse impact.

People who believe they have been harmed need to be able to seek redress through effective judicial and non-judicial grievance mechanisms. Apologies, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of further harm constitute types of remedy.

**Box 4. What does access to remedy mean?**

Reception of Complaints

Can be received through multiple avenues such as written complaints, telephone hotlines, or online systems. The requirements for submitting a grievance should not be unduly formal or strict.

Assessment

Seeks to understand whether the grievance falls within the scope of the mechanism. This is discussed further in section 3.2 below.

Investigation

Involves understanding the nature of allegations, factual underpinnings of a grievance, and what remedy is being sought. It needs to be determined whether remedy should be provided – either due to a breach of policy or due to broader considerations such as fairness.

Remediation

Can include apologies, rehabilitation, financial or non-financial compensation, punitive sanctions (whether criminal or administrative, such as fines), and the prevention of further harm.

Monitoring

Should strive to ensure that grievance procedures are effective. This is discussed further in section 3.4 below.
Overall, the following principles need to be considered with respect to the development and administration of grievance mechanisms:

• Consideration should be given to the effectiveness of grievance mechanisms. While this inquiry will be highly context dependent, the UN Guiding Principles on Business and Human Rights (UNGPs) provide criteria for assessing the effectiveness of grievance mechanisms. In brief, grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning (as outlined in Principle 31 of the UNGPs). Additionally, operational-level grievance mechanisms should be based on engagement and dialogue.

• The first step in developing policies is to assess the state’s ability, capacity and inclination to provide redress for human and labour rights violations, and to consult with local experts, communities and workers to understand what other options already exist. Event organisers may wish to formulate a Stakeholder Oversight Group to provide advice on integrating stakeholder perspectives into the implementation of relevant mechanisms.

• The State, event organisers, and businesses have a shared responsibility to ensure that individuals have access to effective remedy in relation to rights infringements or abuses of a judicial or non-judicial nature. The State has the primary duty to ensure those harmed by businesses or other entities have access to justice. However, corruption or inefficient justice systems can be a further barrier for people seeking remedy. This may require event organisers to add supplementary routes to remedy.

• Grievance mechanisms developed for major sporting events should complement and not undermine local judicial mechanisms or preclude access to judicial or other non-judicial grievance mechanisms. Affected groups may already be aware of how to access local justice systems, through worker councils, local union officials or informal processes, for instance.

3.1 ESTABLISHING GRIEVANCE POLICIES AND PROCEDURES

Affected groups and individuals must be provided with a clear understanding of where and how they can seek remedy. This should stem from a transparent and easily accessible grievance policy or procedure developed by the organising body responsible for delivery and implementation of the event.

Within this broader policy framework, other parties might be responsible for providing grievance redress depending on the nature of a claim or type of stakeholder affected (e.g. children). This should be clearly stated, and policies might specify working with partners (e.g. sponsors, broadcasters, businesses) to agree codes of conduct which include development of their own grievance processes. This may require additional resources to help partners build capacity to implement human resource systems and practices that can handle grievances in line with an organisation’s standards. Contracts should set out grievance processes and dispute resolution procedures. Contractual clauses should be reasonable and realistic, principled and practical.
3.2 SCOPE OF A GRIEVANCE MECHANISM

Consideration will have to be given to the scope of a grievance procedure or mechanism. Organising authorities should define the types of complaints that fall under the scope of relevant mechanisms as well as available outcomes. This should be clearly stated in policies or procedures.

In the example provided (Box 4), the mechanism for the London 2012 Olympics applied to all complaints relating to alleged breaches of the Sustainable Sourcing Code, by LOCOG’s commercial partners or their suppliers. In practice, most of the complaints received by the mechanism related to multiple issues, as well as to multiple worksites. Organising authorities should consider whether the mechanism will be available to fans, athletes, communities, workers or others impacted by third parties who have no formal connection to the event or games. This might be food vendors operating in close proximity to venues, for instance.

3.3 PROVIDING REMEDY TO HARMED PERSONS

If a need to provide remedy is identified, it is important to consider what the person or affected group wants. This requires engagement and open conversation during the grievance process. Some affected groups may require special provisions to be put in place e.g. persons under 18, including athletes and other workers.

Based on this consideration, appropriate remediation should counteract, or make good, the adverse impact. Broader considerations may also seek to address the underlying systemic circumstances that gave rise to a particular harm or impact.

Box 5. Grievance mechanism developed for London 2012 Olympics supply chain

The London Organising Committee of the Olympic Games and Paralympic Games (LOCOG) developed an innovative process to deal with complaints and grievances related to the application of its Sustainable Sourcing Code by commercial partners, particularly in relation to labour conditions at factories supplying sponsors, licensees and suppliers. LOCOG commissioned a specialist partner to devise the process which was informed by the UN Guiding Principles on Business and Human Rights. The Complaint and Dispute Resolution Mechanism was in addition to the auditing, monitoring and evaluation efforts of LOCOG and its commercial partners. The Complaint and Dispute Resolution Mechanism was based on the underlying design principle of seeking agreement between the parties on issues and outcomes as far as possible. It dealt with a range of labour issues, including some press allegations about factory working conditions in various countries and complaints from international and national trade unions and civil society organisations, as well as complaints from individual workers.
3.4 MONITORING GRIEVANCES

It is important that organising authorities monitor the use and effectiveness of grievance procedures. This will aid understanding of what is working and where there are opportunities for improvement. Assessment of effectiveness should focus on process and outcomes. Ultimately, it should be users who confirm whether the system meets their needs. Key performance indicators can be developed to facilitate monitoring and reporting. The following aspects should be considered when designing, managing, and evaluating mechanisms:

- Knowledge of and trust in the grievance procedure. Stakeholder surveys (preferably by an independent third party) should indicate a high and increasing awareness of the mechanism’s existence and a perception that it provides a credible, worthwhile process.

- The number of complaints or grievances brought to the mechanism. If the mechanism is unused, this may be a sign that people are not aware of it, do not trust it, or are unsure how to submit complaints. A well-used mechanism will highlight both problems occurring within event management and operations, as well as demonstrate a degree of trust in the mechanism itself.

- Level of satisfaction with remedy procedures, including state-based systems. Regular monitoring of the grievance procedure and follow-up with individuals or groups who have submitted complaints will indicate the degree of satisfaction victims have in both the grievance process, and the type of remedy provided.

- Maintain a centralised record or complaints and report findings of evaluations to internal & external stakeholders & event leadership. Establish a schedule for regular reporting and evaluation. Publish complaint summaries as part of event reporting and to aid continued learning.
4. LEARN: LEGACY, LEARNING AND COLLABORATION

A clear focus on legacy during the delivery of a major sporting event can contribute to lasting positive impacts to host communities.

While the construction of new or improved infrastructure may be the most immediate and visible impact, the delivery phase is also key to securing other positive outcomes such as the promotion of sports and healthy lifestyles, and the advancement of human rights in host communities. This may be achieved through positive campaigns to combat social challenges such as domestic violence or substance addiction; skills training and new and improved jobs; increased access to and participation in sports amongst minority groups, reduction in prejudicial attitudes; or greater press freedom.

Key to achieving this is engaging with relevant affected groups and other stakeholders identified in the stakeholder mapping process to maximise the event’s potential. Seeking opportunities to engage stakeholders with a view to tackling difficult issues can have lasting impacts simply through promotion of debate and dialogue. Benefits may be accrued and enjoyed not just by local communities, but by the country as a whole.
Human rights considerations need to be factored into event planning, delivery and the legacy focus, with appropriate expert support. Any progress made on issues such as workers’ rights, discrimination or press freedom during the event needs to be proactively pursued afterwards to prevent backsliding.

Progress made and lessons learned from delivering a major sporting event and working to respect human rights should be captured and disseminated. A key outcome can include sharing lessons with other countries and organising committees – whether through dialogue, conferences, sports fora, publications, or formal capacity building / knowledge sharing sessions. This will enable future organisers to build on progress made and to build better risk mitigation strategies. Work around sustainable event management and human rights during delivery is nascent, and securing lasting, positive impacts is particularly challenging.

Organising authorities should help facilitate a transparent follow-up process of assessment and reporting and work with external partners who can independently verify progress and challenges that proved difficult. The priority should be that learning opportunities are fully maximised and that future sporting events benefit from work undertaken and knowledge gained. The sport event awarding body has a key role to play in these discussions.
### ANNEX I: EXAMPLE OF SIMPLIFIED RACI FRAMEWORK

<table>
<thead>
<tr>
<th>R</th>
<th>A</th>
<th>C</th>
<th>I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responsible</td>
<td>Those responsible for implementing or carrying out this action / activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accountable</td>
<td>Those overseeing this action / activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consulted</td>
<td>Those who may have information relevant to this action / activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Informed</td>
<td>Those who should be kept informed about this action / activity</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Security Comms & external relations Games Operations Venues Transport

<table>
<thead>
<tr>
<th>Safety and security</th>
<th>Security</th>
<th>Comms &amp; external relations</th>
<th>Games Operations</th>
<th>Venues</th>
<th>Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop training curriculum for stadium security personnel</td>
<td>R, A</td>
<td>I</td>
<td>C</td>
<td>C</td>
<td>I</td>
</tr>
<tr>
<td>Develop acceptable stadium behaviour protocol</td>
<td>R, A</td>
<td>I</td>
<td>C</td>
<td>R</td>
<td>I</td>
</tr>
<tr>
<td>(...</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Labour standards and working conditions</th>
<th>Security</th>
<th>Comms &amp; external relations</th>
<th>Games Operations</th>
<th>Venues</th>
<th>Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information campaign on ‘the labour rights of volunteers’</td>
<td>I</td>
<td>R, A</td>
<td>C</td>
<td>C</td>
<td>C</td>
</tr>
<tr>
<td>Verify that all relevant third-party contractors have grievance mechanisms in place, and that these are clearly posted</td>
<td>R</td>
<td>I</td>
<td>R, A</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>(...</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
FURTHER RESOURCES

KEY STANDARDS, CODES AND PRINCIPLES


OTHER STANDARDS, CODES AND PRINCIPLES


GUIDANCE AND TOOLKITS


RISK INFORMATION AND LEGAL INFORMATION


Human Rights Watch (HRW), World Reports: https://www.hrw.org/world-report/2019


International Trade Union Confederation (ITUC), Global Rights Index: https://www.ituc-csi.org/RI19

Office of the High Commissioner for Human Rights (OHCHR), Reports by human rights treaty bodies: https://www.ohchr.org/EN/HRBodies/Pages/HumanRightsBodies.aspx


OTHER RESOURCES AND CASE STUDIES


Committee to Protect Journalists (CPJ), Safety Advisories: https://cpj.org/safety-advisories/


