



Centre for Sport
& Human Rights

UEFA EURO 2024 Human Rights Board: Insights and Recommendations from the Centre for Sport and Human Rights

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CONTENTS

EXECUTIVE SUMMARY	3
PART 1: INTRODUCTION	5
SCOPE	5
EURO 2024 HUMAN RIGHTS BOARD	6
STANDARDS OF REFERENCE	7
THE RESPONSIBILITY TO RESPECT	8
KEY CONCEPTS	9
PART 2: OVERVIEW OF RELEVANT EURO 2024	10
A. BIDDING CRITERIA	10
B. HUMAN RIGHTS DECLARATION	11
C. HUMAN RIGHTS GRIEVANCE MECHANISM	11
D. RAPID RESPONSE MECHANISM	12
E. FAN WELFARE COORDINATORS	12
F. WORKFORCE AWARENESS RAISING	13
PART 3: RECOMMENDATIONS TO BUILD ON GOOD PRACTICES	14
1. STRENGTHEN ENGAGEMENT, RISK ASSESSMENT AND MITIGATION PROCESSES	14
2. APPOINT A STANDING HUMAN RIGHTS BOARD	15
3. FURTHER DEVELOP FAN WELFARE MEASURES & RAPID RESPONSE SYSTEMS	16
4. REINFORCE EVENT-RELATED GRIEVANCE MECHANISMS	16
5. ADOPT A FORMAL HUMAN RIGHTS POLICY	17
APPENDIX: PARTICIPANTS IN THE MEETINGS OF THE HUMAN RIGHTS BOARD	19

EXECUTIVE SUMMARY

This review presents independent reflections from the Centre for Sport and Human Rights ('**CSHR**') to UEFA, to relevant stakeholders, and to the broader public on the role and work of the UEFA EURO 2024 Human Rights Board ('**Board**'). The Board was established to promote structured exchange between tournament organisers and human rights stakeholders on the human rights risks identified for the tournament and to support the successful implementation of various human rights measures put in place for the UEFA EURO 2024 European Championships held in Germany ('**EURO 2024**').

This review recognises and welcomes the series of [human rights initiatives undertaken by UEFA for EURO 2024](#), UEFA's responsiveness to human rights stakeholders in the run up to and during the tournament, and the access and transparency afforded to members of the Board. The insights presented provide an overview of the measures implemented by UEFA as disclosed to the Board and the recommendations propose areas to further expand on the good practices established for EURO 2024 and build on this experience for future tournaments.

Looking ahead, the document identifies some suggested next steps that would support the further institutionalisation of UEFA's commitments to embedding human rights due diligence ('**HRDD**'), consistent with internationally recognised standards and in line with UEFA's existing statements and commitments. The recommendations are of a technical nature and have been prepared for those already with a good understanding of international human rights standards.

Building on the work done by UEFA so far and on the experience of the Board, the document also emphasises the importance of meaningful stakeholder engagement processes. Engagement is part of a broader shift towards more responsible practices within sport and helps build a culture that integrates stakeholders into decision-making in all stages of a tournament, from the moment a host has been awarded, onwards to the concept stage, the delivery of the competition, and the legacy of the event.

Acknowledging that EURO 2024 was the first major UEFA event, and one of the first mega-sporting events ('**MSEs**') in the world, where significant HRDD steps have been undertaken, this review reveals a promising and wide-ranging approach to managing human rights risks in the context of the tournament. It references international frameworks and standards that can support UEFA in further building on its successful stakeholder engagement efforts connected to EURO 2024, including the United Nations ('**UN**') Guiding Principles on Business and Human Rights ('**UNGPs**'), the Organisation for Economic Co-operation and Development ('**OECD**') Due Diligence Guidance for Responsible Business Conduct ('**OECD Guidance**') and the Council of Europe's Recommendation (2016)³ on human rights and business and Recommendation (2021)⁵ of the European Sports Charter.

Structured stakeholder engagement is a requirement in these frameworks and an integral part of meaningful HRDD. Over time it helps build trust, reinforces external

confidence, enhances organisational awareness, provides access to intelligence, and generates innovation.

It is recommended that UEFA builds on the measures described and further connects, aligns and integrates them in processes related to the delivery of future events. In particular, UEFA has an opportunity to take steps to institutionalise its work on human rights by reviewing existing event delivery systems through a human rights lens, deepening relationships with external stakeholders, and increasing internal capacity on HRDD. A strong legacy from the tournament would see the establishment of a standing human rights board, further development of fan welfare measures and rapid response systems, the iteration of event-related grievance mechanisms, further steps to consolidate and standardise good practices related to services, infrastructure and training for all events, and to evolve from an event-based approach to an organisation-based approach to HRDD via the adoption of a formal human rights policy.

Moving further towards a systematic institutional approach to HRDD can consolidate the good practice put in place for EURO 2024, provide UEFA with a solid foundation to further maximise the impact of its established sustainability initiatives, and strengthen UEFA's ongoing mission to promote positive social impact in football. Taken together, these strategies can support UEFA's position as a responsible corporate citizen and as a proponent of responsible sport, further bringing to life the organisation's longstanding commitment to the value of 'respect'.

PART 1: INTRODUCTION

Scope

This document reflects on the work of the UEFA EURO 2024 Human Rights Board ('**Board**'). The Board was established to promote structured exchange between UEFA and human rights stakeholders on the human rights risks identified for the tournament and to support the successful implementation of the tournament's [Human Rights Declaration](#) through various measures put in place, including as part of UEFA's [ESG strategy](#), for the UEFA EURO 2024 European Championships in Germany ('**EURO 2024**').

The Centre for Sport and Human Rights ('**CSHR**') developed these insights and recommendations in its capacity as rapporteur to the Board, agreeing to "produce a short review of the Board's work, commentary on the human rights process in place and make some independent recommendations for UEFA to consider when constructing future mechanisms and processes." UEFA and members of the Board (listed in the Appendix) have had the opportunity to review and comment on this document prior to being finalised by CSHR.

The emphasis of this review is on the human rights due diligence ('**HRDD**') measures put in place for EURO 2024 as presented to the Board, and reflects the timeframe and mandate of the Board, as convened by UEFA, between May 2024 and November 2024. The recommendations, included in Part 3 (below), cover areas that relate to future tournaments and UEFA as an institution.

About the Centre for Sport and Human Rights

Underpinned by a commitment to international human rights and labour standards, the Centre for Sport and Human Rights (CSHR) delivers activities and initiatives across the realms of day-to-day sport and mega-sporting events. A centre of expertise, CSHR convenes a network of significant institutions representing diverse interests from sports, business, trade unions, governments, intergovernmental and non-governmental organisations. Stewarded by Mary Robinson (former President of Ireland) as Founding Chair, CSHR has a unique structure with the Office of the UN High Commissioner for Human Rights (OHCHR) and the International Labour Organisation (ILO) formally part of its governance alongside peak global bodies representing workers, employers and athletes. Established in 2018, CSHR is now a specialist human rights agency headquartered in Geneva, Switzerland, working to bring all actors in the sport ecosystem together to understand and act upon their roles and responsibilities - requiring a strong and iterative focus on building trust, conducting outreach and deepening engagement.

UEFA, the Sport and Rights Alliance, Football Supporters Europe and Transparency International Germany are all founding members of CSHR's Advisory Council, a body that includes almost 50 governments and institutions committed to upholding the Sporting Chance Principles, which were developed by the Advisory Council to affirm a shared commitment to realising human rights in and through sport.

This review has been produced independently by CSHR as part of its public mission, with the disclosure that CSHR is grateful for a donation received from UEFA that supports its not-for-profit activities. This document was authored by CSHR's William Rook, Daniela Heerdt, and Guido Battaglia.

EURO 2024 Human Rights Board

UEFA established the Board in the immediate run up to EURO 2024. Under the stewardship of the UEFA General Secretary, participants included staff from UEFA and EURO 2024 GmbH¹, along with Board members representing international civil society organisations, independent experts, German human rights stakeholders, and CSHR. The Board met for the first time in May 2024 and met five times in total.

The purpose of the Board was to:

- Provide UEFA with expert guidance on human rights issues related to the delivery of the tournament;
- Serve as a central point of information within UEFA and EURO 2024 for matters related to human rights at the tournament;
- Facilitate communication and collaboration among stakeholders;
- Provide an opportunity to share perspectives and shape best practices; and
- Observe and make recommendations on the operational implementation of relevant policies and actions in the context of EURO 2024.

Members of the Board, including organisations representing a diverse range of stakeholders and affected groups, welcomed UEFA's initiative and the structured approach to engagement and consultation. For UEFA, the Board played a function of facilitating dialogue with key institutional partners, strengthening discussions with relevant stakeholders of EURO 2024, and streamlining communications channels on human rights topics. It served to be an efficient model for generating feedback from expert participants and for open discussion on tournament-related human rights risks.

Matters tabled for the Board's review and consideration included:

- Review of and feedback on the EURO 2024 Human Rights Grievance Mechanism;
- Briefings for and feedback from Board members on operational matters of tournament delivery, to provide Board members with insight into event management and potential human rights impacts connected to operations; and
- Presentations on the range of human rights measures implemented by UEFA for EURO 2024.

The Board met in-person in Düsseldorf on 17 June 2024 and members were provided with updates on the trends and issues being identified in real time via the Grievance Mechanism and other reporting channels. Information was shared in compliance with relevant confidentiality and data protection requirements. Members of the Board were also provided with tournament accreditation to access official venues in order to facilitate further observations and feedback, demonstrating a welcome and transparent approach.

The modality of the Board provided an effective structure for fruitful engagement and collaboration. UEFA would for instance gather feedback from Board members on the various measures and ahead of public communications and demonstrated a high level of responsiveness regarding feedback provided on the Grievance Mechanism, on recommendations to further promote complaints and grievance channels, and in following-up on risks identified and shared by members of the Board. This led to a genuine exchange between the Board and UEFA.

¹ EURO 2024 GmbH was the joint venture organisation established between UEFA Events SA and DFB EURO GmbH responsible for the operational planning and implementation of the tournament.

In general, Board members noted that the work of the Board and its effectiveness would have been enhanced by having been convened far earlier in the process. While the human rights achievements of EURO 2024 are commendable, had the Board's expertise been available when developing the EURO 2024 Human Rights Declaration, Risk Assessment, and in the initial design of the Grievance Mechanism, there would have been an opportunity for even greater cohesion and impact. Members of the Board also reflected on the Board's composition and suggested greater engagement with representatives from a wider pool of key human rights stakeholders in future, including representatives of players, workers, and representatives of marginalised communities. Formalisation of a future human rights board with comprehensive terms of reference would be a welcome legacy from the tournament.

"We want to engage with civil society, and to continue to play a role to promote universal human rights among the football community."

Theodore Theodoridis, UEFA Secretary General, Sporting Chance Forum 2023



Standards of Reference

In line with the UN 2030 Agenda for Sustainable Development, all measures advancing the Sustainable Development Goals ('SDGs') must be "people-centred, gender-sensitive, respect human rights and have a particular focus on the poorest, most vulnerable and those furthest behind." Following widespread acceptance and advocacy from actors across the sports ecosystem, including society organisations and trade unions, some of the major sport organisations of the world, including UEFA, have acknowledged the [UN Guiding Principles on Business and Human Rights \('UNGPs'\)](#) as the main standard of reference for their human rights work.

The [Tournament Requirements](#) and [Bid Dossier Template](#) for EURO 2024 required bidders to integrate the UNGPs and to respect, protect and fulfil human rights and fundamental freedoms during the Bidding Procedure and, if appointed, until the dismantling of the tournament. As a result, the event owners and organisers committed in a Human Rights Declaration to aligning respective actions during the preparation and staging of the event with the UNGPs.

The development of the Board itself is an important and promising step taken by UEFA in its journey towards integrating stakeholder engagement into its ongoing HRDD processes in line with internationally recognised human rights instruments, principles, and standards. These standards are the key reference that informed this review of the EURO 2024 human rights measures described below, and all recommendations and suggested next steps have been drafted to promote further alignment with best practices defined in these standards.

The Responsibility to Respect

The UNGPs are the most widely accepted global standard outlining the obligations of governments, commercial enterprises and other non-governmental actors with regard to human rights. Adopted unanimously by the UN Human Rights Council in 2011, they provide that businesses and other non-state actors, including sports bodies, have a 'responsibility to respect human rights' which sits in parallel with existing State duties to protect human rights. The principal means by which organisations fulfil their 'responsibility to respect' is via a public high-level commitment to respecting human rights and conducting robust and ongoing HRDD, while ensuring that there is access to effective remedy for anyone whose human rights are negatively impacted. Effective HRDD processes should be aligned with international standards, such as the [OECD Guidelines for Multinational Enterprises](#) and its [Due Diligence Guidance for Responsible Business Conduct \('OECD Guidance'\)](#).

Within European sport, HRDD is also incorporated into the [Council of Europe's European Sports Charter](#) as part of provisions on 'values-based sport'. The European Sports Charter (Article 6.2) calls for all sports stakeholders in Europe to adopt HRDD approaches, including:

- working "towards the inclusion of a clear commitment to human rights in the respective policy and/or regulatory frameworks";
- upholding "human rights in the context of the organisation of sports events" and introducing "human rights considerations and objectives into the whole life cycle of major sporting events, starting with the bidding process and including planning for a lasting positive legacy"; and
- further investing in "the effective implementation of human rights standards in and through sport, in particular by developing governmental/non-governmental partnerships and using multistakeholder platforms to identify and promote measures to prevent and respond to human rights violations in sport."

"Sport bodies have a responsibility to respect human rights: that is, to provide equal opportunity, to avoid harming people through their activities or business relationships, and to address any harms that do occur. To do so requires having proper processes in place that ensure sport bodies act responsibly, through their governance, in a manner consistent with internationally recognised principles, such as the UNGPs. All stakeholders in the sport ecosystem, including athletes, fans, communities, workers, children, volunteers, journalists, human rights defenders, potentially marginalised groups, and others must have their rights respected in and through sport."

Peggy Hicks, Director, Thematic Engagement, Special Procedures and Right to Development Division, UN Human Rights Office.

Key Concepts

Concept	Definition
Human Rights Due Diligence (HRDD)	A one-time and ongoing process to proactively uncover and assess the human rights (and environmental) risks and impacts of an organisation across its operations and its supply chain and business partnership, which aims to understand facts and identify, prevent, reduce and account for how adverse human rights impacts are addressed.
Stakeholder Engagement	To meaningfully include an individual or group of people in a process, decision or investigation that has or could affect(ed) them. The process should be safe and respectful and allow those (potentially) impacted by an activity or process to have their views or those of their representative(s) taken into account. In the context of human rights risks, we talk about 'meaningful' engagement to stress the importance of the process being more than perfunctory or performative, which means it must be a two-way process, conducted in good faith, responsive, and ongoing.
Remedy	Remedy is both a process and an outcome that is supposed to correct or make good a wrong, harm, or injury to an individual or group of people, by enforcing a right and/or redressing a wrong. The aim is to restore victims/survivors to the situation they would have been in beforehand if that is still possible, or to compensate them in some way if it is not. Organisations (including sports bodies) that cause, contribute, or are directly linked to a harm, have a responsibility to provide, contribute to, or use their leverage to encourage remedy for those who have been harmed.

Additional concepts and definitions helpful in using and interpreting sport and human rights language are available in CSHR's [Sport and Human Rights Glossary](#), an ongoing, consultative process aimed at bringing greater clarity and coherence to the language used to discuss and advance human rights in sport.

PART 2: OVERVIEW OF RELEVANT EURO 2024 HUMAN RIGHTS MEASURES

Most of the human rights measures established by UEFA for EURO 2024 pre-dated the formation, involvement and consideration of the Board and were triggered by the original tournament requirements, further supported by [UEFA's ESG strategy for the tournament](#). These are included in this summary to provide context to the human rights steps that were adopted and presented to the Board and where stakeholder feedback was sought. The measures presented here are described based on publicly available information and on information disclosed to the Board, reproduced here with UEFA's consent. Additional measures undertaken by UEFA to support the protection of and respect for human rights, including an anti-discrimination match observer programme, online abuse monitoring, and an audio-descriptive commentary service are [described in UEFA's official EURO 2024 ESG report](#).

A. Bidding Criteria

UEFA's commitment to respect human rights at EURO 2024 was established in the event's bidding criteria. Following a period of engagement with civil society and trade unions, UEFA issued new [tournament requirements](#) in 2017 which included, for the first time, human rights and anti-corruption criteria referencing the UNGPs. This required bidders for the rights to host the event to demonstrate their "obligation to respect, protect and fulfil human rights and fundamental freedoms, with a duty to respect human, labour and child rights during the Bidding Procedure and, if appointed, until the end of the dismantling of UEFA EURO 2024." As a result, it is worth noting that EURO 2024 was a global forerunner among international sporting events with requirements to have human rights criteria embedded from the bid stage.

The [bidding criteria](#) were developed in consultation with key civil society organisations including the Sport and Rights Alliance (SRA) and the predecessor parent organisation of CSHR (the Institute for Human Rights and Business). Human rights dimensions were subsequently a material part of the assessment of the two bids received for EURO 2024. Germany was awarded the right to host EURO 2024 on 27 September 2018. As with other commitments made during the bidding process, the human rights requirements were incorporated into Germany's hosting obligations.

Even prior to Germany's bid, a [EURO 2024 Stakeholder Initiative](#) was founded in 2016 by a group of civil society organisations with the goal to embed human rights and sustainability in the bidding, planning and implementation of the tournament. This initiative included the commitment that "the awarding and hosting of major international sporting events should be strictly linked to compliance with" the UNGPs. Members of the initiative participated in consultations, shared knowledge and produced resources to support not only UEFA and the DFB, but also state actors and in particular the ten venues with living up to their responsibilities to prevent human rights violations in connection with the tournament, to provide remedy in the event of incidents and at the same time to make contributions to further sustainable development in Germany.

B. Human Rights Declaration

In 2023, a [EURO 2024 Human Rights Declaration](#) (available in [English](#) and [German](#)) was adopted. The declaration states that: "Sport and major sporting events have the power and outreach to strengthen social cohesion, combat discrimination and promote equity and inclusion for all. However, this can only be achieved if all actors involved in sport identify, prevent, mitigate and account for how they address their impacts on fundamental rights."

The declaration expressed a collaborative commitment by UEFA, the German Football Association (DFB), the German federal government and the ten host cities to protect and promote human rights. It was developed with input from various interest groups, stakeholders and human rights experts such as the SRA, CSHR, the EURO 2024 Stakeholder Initiative and the German Institute for Human Rights. The key areas of focus in this declaration include:

- Ensuring the tournament is accessible to all, including people with disabilities;
- Promoting a culture of inclusivity and respect for diversity among all participants and spectators;
- Implementing measures to prevent and address all forms of discrimination; and
- Safeguarding the physical and mental health of everyone involved in the tournament.

EURO 2024 was the first time that a major sporting event adopted a human rights declaration, and importantly the declaration included strong reference to international instruments and standards, and provided an overview of the most salient human rights risks for the tournament. It was also the first time that all actors involved in staging an event adopted a declaration jointly.

C. Human Rights Grievance Mechanism

From 1 June 2024 to 31 July 2024 UEFA made a comprehensive human rights grievance mechanism available online and via telephone, having engaged bilaterally with civil society representatives in the design phase of the mechanism. This complaints system, building on a mechanism in place for reporting human rights violations in the EURO 2024 supply chain, was included in the official tournament app and [accessible via the UEFA website](#). It was also promoted widely by civil society partners including the SRA. The mechanism was available for anyone affected at any time by the tournament: from players to spectators, journalists, human rights defenders, as well as workers, volunteers, suppliers and service providers.

Key features of the grievance mechanism included that:

- The mechanism was operated independently by the German law firm Rettenmaier, with technical assistance from Legaltegrity.
- Reports could be filed via a secure online form, available in all the languages of the participating teams to ensure that language was not a barrier.
- Reports were handled confidentially by lawyers with trauma-informed training, and individuals could choose to remain anonymous.

Details of the mechanism's operations and performance, including anonymised

information about patterns of grievances, were disclosed to the Board. In total 529 complaints were filed using the Grievance Mechanism. As of 25 July 2024 UEFA reported to the Board that a total of 386 were closed by the appointed law firm. UEFA disclosed to the Board that the majority of cases related to issues concerning political behaviour, for example reports of nationalist, right-wing statements, gestures, and symbols attributed to players and fans. The second most prominent issue related to treatment received by fans from stewards, including reports of a lack of intervention by stewards. The third most common category of complaints related to accessibility and mobility services. Board members were not in a position to form a view on the outcomes of how particular grievances were handled. Analysis of the outcomes of the mechanism will be reported on by UEFA.

D. Rapid Response Mechanism

In addition to the Human Rights Grievance Mechanism, a Rapid Response Mechanism was implemented at all stadiums during EURO 2024, with a system designed to provide immediate assistance to spectators who felt overwhelmed, harassed, discriminated against, threatened or otherwise unsafe within the stadium. Other venues within the host cities, in particular fan zones, operated their own rapid response systems.

Dedicated teams, including paramedics and personnel trained in providing psycho-social care were available on match days to offer immediate help to those in need of assistance and dedicated facilities were available in case of need. The existence of the mechanism was advertised on posters throughout stadiums informing spectators about the help available. Importantly, scannable QR codes on the posters were geo-located, enabling assigned volunteers to directly attend to a fan in need of assistance and escort them to a 'safe room' facility. Posters prominently asked: *"Do you or does someone else need help?"* Spectators could also reach the dedicated rapid response team through an online link, also included in the official tournament app. The technical set-up of the mechanism was financially supported by SAFER (Support & Awareness for Female fans in European football through Research, prevention, and remedy), a project led by Football Supporters Europe and funded by the Erasmus + scheme of the European Commission, involving the support and participation of the technical provider Safer Spaces and the German Red Cross.

The reasons reported for activating the mechanism included instances of anxiety and medical issues, plus a small number of cases reporting sexual harassment and racial discrimination. Not all venues advertised the mechanism to the same extent, and at some fan zones it was not advertised at all. As part of FSE's Erasmus+ project, an independent evaluation of the Rapid Response Mechanism accompanied its implementation in real time and will lead to recommendations for improving its roll out in future tournaments.

E. Fan Welfare Coordinators

Fans represent a large constituency of potentially affected persons at MSEs. For EURO 2024, a range of fan-led initiatives took place in each host city, promoting the role of fans in actively shaping the tournament experience. To support these efforts, UEFA

launched the Fan Welfare Coordinators function as a new role for EURO 2024. This pilot initiative, developed in consultation with CSHR and FSE, was designed to support identifying and managing risks in relation to fans' dignity and well-being.

Building on methodologies to support real time human rights due diligence at tournament-time by monitoring, observing and escalating human rights issues, Fan Welfare Coordinators were appointed in each host city and were active on match day and the day before match day.

Largely recruited from a pool of experienced Supporter Liaison Officers - in many cases already employed by major clubs in host cities - the Fan Welfare Coordinators had a high degree of familiarity with fans and fan-related issues. Reports included observations on the behaviour of key groups - including fans, stewards, volunteers and the police and supported intelligence gathering on human rights risks. Trends identified and reported by the Fan Welfare Coordinators included feedback on signage (affecting spectator safety and welfare regarding ingress and egress), accessibility issues (mostly around public transport locations), and anti-social behaviour.

Fan Welfare Coordinators received introductory human rights observer training from CSHR, including scenario-based case studies. The role has the potential to be further honed and developed in future if given a longer lead time ahead of the tournament.

F. Workforce Awareness Raising

As part of mainstreaming awareness of human rights issues and anti-discrimination among the EURO 2024 workforce, UEFA launched an awareness-raising video as part of the staff and volunteer training programme. A short video, developed with CSHR and building on the commitments undertaken in the Declaration, provided an introduction and sensitisation to human rights, presenting a range of potential scenarios foreseeable at the tournament, consistent with the event's risk assessment. The awareness raising video also addressed the role and responsibilities of the entire workforce with respect to human rights, and how to raise complaints using the Human Rights Grievance Mechanism.

PART 3: RECOMMENDATIONS TO BUILD ON GOOD PRACTICES

1. Strengthen engagement, risk assessment and mitigation processes

UEFA's approach to stakeholder engagement for future tournaments can be strengthened by engaging earlier, ideally right after the host has been selected, and more systematically [across the lifecycle of future tournaments](#) with a range of human rights stakeholders, including local and regional civil society organisations representing all potentially impacted stakeholders, including: workers, athletes, fans, journalists, communities, and human rights defenders. Identifying human rights risks and developing mitigation strategies are spheres where it is particularly important to engage with those potentially affected.

UEFA can build on its EURO 2024 engagement achievements for future events by:

- Strengthening and detailing human rights criteria based on international standards for major event bidding requirements and reinforcing these criteria for future tournaments, including in hosting declarations and guarantees, with a more formalised system for early and active stakeholder engagement throughout a comprehensive due diligence process.
- Utilising an [inclusive sports ecosystem model](#) to map all the actors involved, institutional and business relationships within delivery partners, networks and coalitions representing potentially affected persons.
- Investing in long-term relationship-building with human rights experts and people with lived experience, including individuals and communities that have or may be impacted by UEFA's activities such as athletes, staff, workers, volunteers, fans, and journalists, with a particular focus on ensuring a diverse representation within and fostering inclusive engagement with the most vulnerable or at-risk.
- Involving and considering from the earliest stage of the tournament preparation the recommendations of external advisors, including representatives of affected stakeholders, human rights and inclusion experts, civil society, relevant intergovernmental organisations, National Human Rights Institutions, and academia to ensure greater incorporation of host-country specific human rights risks in developing risk assessments.
- Ensuring that future tournament human rights declarations are adopted at an earlier stage of the event lifecycle, separate out any risk assessment and mitigation plan from the commitment itself, and keep joint declarations distinct from internal policy approaches in order to avoid any conflation of the various human rights duties and responsibilities of different actors. Requiring potential event hosts to include a draft declaration as part of their bid could be a valuable step in promoting stakeholder engagement at the national level at an early stage.
- Adopting safe, consensual and trauma-informed approaches, with particular attention placed on the "do not harm" principle and with due consideration for meeting the diverse needs and vulnerabilities of different stakeholder groups, especially when engaging in consultation with victims and survivors and those with lived experiences of human rights violations.
- Consulting meaningfully with stakeholders on an ongoing basis to identify risks, provide input on how risks and issues are grouped, clustered and prioritised as

part of a risk assessment process, offering opportunities for input into the design of mitigation measures for identified risks, and scope to help identify any existing remedy mechanisms that can be employed for the period in advance of the establishment of any event-related grievance mechanism.

- Setting up processes for reviewing and assessing the integration of human rights principles in UEFA's event delivery processes and regulations throughout the event lifecycle, in line with the UNGPs and with the organisation's institutional commitment.
- Actively promoting with governments, intergovernmental organisations, hosting organisations, sponsors, broadcasters and other actors a human rights risk assessment model centred around robust stakeholder engagement.

2. Appoint a standing human rights board

The Board put in place for EURO 2024 was an innovative and collaborative way to address human rights risks that should be commended. That said, the Board was constituted at short notice and its scope restricted to tournament operations, some five years after EURO 2024 was awarded to Germany. A number of other sports institutions have established independent human rights boards or advisory committees to support the implementation of human rights throughout their operations.

To leave a lasting legacy from EURO 2024, UEFA has the opportunity to explore a similar option and build on the role of the Board by constituting a permanent human rights body to support UEFA and future UEFA events with the full breadth of its institutional human rights efforts on an ongoing basis. Such a mechanism would ensure that UEFA continues to improve and strengthen its human rights performance in line with international standards and in consultation with relevant stakeholders. A structure that includes a formal role for external human rights experts and representatives would complement UEFA's existing efforts by facilitating a model for ongoing and meaningful stakeholder engagement.

Best practice in constituting such a body would include giving consideration to:

- Continuing to include a mix of external stakeholders and relevant UEFA staff, and structuring meetings to be co-chaired by a senior executive from UEFA and an independent expert. Ensuring diverse composition of the board would continue to promote balanced agendas and offer good coverage of issues and priorities - including both matters generated internally and those proposed by external experts.
- Further defining the role for the board, with clear terms of reference and a specific mandate to advise and support UEFA at all levels, and including in meetings representatives from senior levels of the organisation.
- Including representatives from a wider group of external stakeholders, representatives, and affected groups, relevant to the full scope of UEFA's activities beyond tournament delivery. The selection of board members should be driven by the outcomes of an ongoing assessment of the most relevant human rights risks.

3. Further develop fan welfare measures and rapid response systems

The innovative Rapid Response Mechanism implemented at venues during EURO 2024 provided immediate assistance to spectators who felt harassed, discriminated against, threatened or otherwise unsafe within the stadium. The mechanism was a positive example of an initiative co-created by various expert agencies that built on established good practices in German stadiums. Further roll-out and implementation of the Rapid Response Mechanism at other UEFA events would represent a legacy contribution of EURO 2024 to safer and more inclusive events in future. In practice, the mechanism, observed by members of the Board, provided valuable services to a range of users. There are opportunities to roll-out and implement such initiatives at other UEFA events and develop future tournament measures in collaboration with local experts, as was the case in Germany for EURO 2024.

The Fan Welfare Coordinator function was also new for EURO 2024 and provides a good example of a successful initiative that benefitted from collective learning, expertise and innovation. The role has the potential to be further honed and developed with longer preparation time.

In future the role would be strengthened by being established well in advance of the tournament to ensure adequate time for recruitment, selection and dissemination to increase awareness of the system, scenario-based training on specific human rights risks, team-building among the coordinators and the development of reporting frameworks and data collection systems. It would be further enhanced, where possible, by partnering with or recruiting local experts already familiar with fan-related issues in the local context and aligning this measure with other elements of UEFA's early warning systems, remedy and grievance processes.

4. Reinforce event-related grievance mechanisms

UEFA EURO 2024 had a number of solutions available to provide access to remedy, including a bespoke Grievance Mechanism and the Rapid Response Mechanism. In line with the [MSE lifecycle approach](#), these two mechanisms supported the capturing of issues at EURO 2024 that can be used to improve future tournaments and to highlight any gaps in the original risk assessment. They also supported real-time due diligence by pinpointing risks that can be responded to quickly and solved during the tournament. The roles of the Fan Welfare Coordinators and match observers are also connected to gathering human rights observations, early warnings and documenting evidence that supports complaints. These various functions could be better streamlined and centralised in future, and connected to an expanded role for human rights volunteers to support capturing information and resolving grievances.

More could also be done to further improve the capturing of data and making people (fans, spectators, workers, journalists, local communities, volunteers and others) aware of mechanisms in future. Ideally, event-related grievance mechanisms are open throughout the entire lifecycle of the event, not just during tournament time, and apply to everyone, including potential third parties. Promoting complaints channels should be fully part of overall event communication strategies and prominently placed within

tournament information channels. Making additional efforts to ensure that local communities are aware of the official tournament channels would also ensure more comprehensive management of risks to the communities that interact with the event and its impacts.

UEFA should expand the scope and duration of future event-specific grievance mechanisms to:

- Be in place from as early as possible in the event lifecycle, ideally soon after the event has been awarded, to one year after its conclusion.
- Be promoted and disseminated in accordance with a specific grievance mechanism communications strategy.
- Align with the existing remedy context in host countries for major events, including through mapping the remedy landscape and signposting to alternative state and non-state based mechanisms as relevant and applicable.
- Enable one system to capture grievances and complaints arising from local communities, tournament workforce and in supply chains - bringing it in line with good practice in place by multinational enterprises.
- Integrate with the continuation of the in-tournament Rapid Response Mechanism, Fan Welfare Coordinators, anti-discrimination match observers, and human rights volunteers, each of which can play important parts of the remedy process.
- Ensure that volunteers, staff and event workforce are specifically trained on human rights risks and scenarios, and how to access and promote relevant complaints, grievance, and rapid response channels.
- Communicate analysis and outcomes of the mechanism in post-tournament reporting.

5. Adopt a formal human rights policy

EURO 2024 was a global forerunner in having human rights embedded from the bid stage. This was an important landmark, with UEFA seizing the opportunity to show leadership in ensuring human rights was a contributing success factor of the delivery of EURO 2024. In addition to these tournament-specific commitments, UEFA has made a number of other human rights commitments that align with its strategic vision. In 2021, UEFA published a [Human Rights Commitment](#). This set the foundations for public expectations, as well as a forward looking [Football Sustainability Strategy](#), culminating in the EURO 2024 tournament.

This commitment was strengthened when UEFA General Secretary Theodore Theodoridis gave a keynote speech at the 2023 edition of the Sporting Chance Forum at the United Nations in Geneva. [Mr Theodoridis stated to the Forum](#) that "our commitment to human rights starts with our own work at UEFA" further noting that "human rights should be inherent in everything we do – in how we treat people, in how we listen to them, and in how we deliver on our mission." In 2024 UEFA published a [new 'strategic vision' for 2024-2030](#). Consistent with a purpose statement that includes a vision of being a "real force for societal progress" and restoring "faith in sporting organisations", UEFA specifies human rights as the first element of its strategic priority to "be at the core of society".

UEFA should build on and consolidate its existing commitments to human rights by adopting and publishing an institution-wide human rights policy embedded at the highest level of the organisation. Human rights policies play an important role in mainstreaming human rights across all functional areas of an organisation, establish a foundation for engagement with third-parties (upstream and downstream), and offer a framework to support further implementation of HRDD. Such a policy should:

- be aligned with, and explicitly reference, authoritative international standards, including with respect to access to remedy;
- further clarify UEFA's responsibility and HRDD plans to respect human rights throughout all its activities including governance, business relationships, revenue generation, and management of its flagship events, for example via aligning existing UEFA policies with human rights;
- publicly record the steps UEFA anticipates taking over time to embed an HRDD approach across the organisation and its tournaments, sending an important signal to all stakeholders;
- be developed with insights gathered from internal and external experts.

APPENDIX: PARTICIPANTS IN THE MEETINGS OF THE HUMAN RIGHTS BOARD

Board chairs:

- **Theodore Theodoridis** (General Secretary, UEFA)
- **Laura McAllister** (Vice President and Executive Committee Member, UEFA)

Board members:

- **Paul Elliott CBE MBE** (Diversity and Inclusion Specialist, the FA; Member of UEFA's Social & Environmental Sustainability Committee; Member of UEFA's Human Rights Steering Group)
- **Ronan Evain** (Executive Director, Football Supporters Europe)
- **Andrea Florence** (Director, Sport and Rights Alliance)
- **Thomas Hitzlsperger** (ex-player and Diversity Leader, Member of UEFA's Human Rights Steering Group)
- **William Rook** (Deputy CEO, Centre for Sport and Human Rights)
- **Sylvia Schenk** (Chair of the Working Group on Sport, Transparency International)
- **Bibiana Steinhaus-Webb** (ex-referee, Member of UEFA's Human Rights Steering Group)
- **Sophie von Waitz** (Advocacy Officer, Reporter ohne Grenzen)
- **Michael Windfuhr** (Deputy Director, Deutsches Institut für Menschenrechte)
- **Daniela Wurbs** (Diversity and Inclusion expert, KickIn!)

UEFA participants:

- **Michele Uva** (Director of Social and Environmental Sustainability, UEFA)
- **Julien Zylberstein** (Managing Director of European Affairs & Governance, UEFA)
- **Andreas Schär** (Managing Director, EURO 2024)
- **Filippo Veglio** (Head of Social & Environmental Sustainability, UEFA)
- **Alex Higgins** (Senior Manager, European Affairs & Governance, UEFA)
- **Presilia Mpanu-Mpanu** (Social & Environmental Sustainability Expert, UEFA)
- **Julian Rössler** (Public Affairs & Human Rights Expert, EURO 2024)



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