



HUMAN RIGHTS PLAYBOOK: INTEGRATING HUMAN RIGHTS IN THE GOVERNANCE OF SPORT BODIES



Centre for Sport
& Human Rights

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This guide has been developed by the Centre for Sport and Human Rights (CSHR) with Ergon Associates Ltd (Ergon). Drafting was led by Alison Biscoe of CSHR with support and input from Matthew Waller and Steve Gibbons from Ergon and William Rook and Mary Harvey of CSHR. Commonwealth Games Associations were also consulted on the guide as part of a CSHR workshop in Kigali, Rwanda in September 2019. The guide was subsequently edited and updated, and re-circulated for consultation.

This tool provides guidance on managing human rights risks and implementing human rights due diligence processes within different types of sport organisations. It builds on the 2018 CSHR publication [Championing Human Rights](#) - developed collaboratively by setting out four tangible steps sport bodies can take to integrate human rights into the governance of their organisations. This guidance now updates, expands and provides further detail on how to implement these four steps. For those seeking further support, there are two additional tools that can be used to work through some of the more technical elements of this process: 1) [A step-by-step guide guide on drafting a human rights policy](#), and 2) A closer look at how to conduct meaningful stakeholder engagement.

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FOREWORD

BY PEGGY HICKS, UN HUMAN RIGHTS OFFICE

In 1948, the Universal Declaration of Human Rights (UDHR) recognised that governance oriented toward promoting and protecting human rights is the foundation of freedom, justice and peace in the world. 75 years on, there is an urgent need to come together to confront humanity's most pressing challenges. Much of the potential of human rights to inspire and to help build a better, more equal, just and prosperous world for all remains untapped, and is well aligned to sporting values.

Sport bodies are the custodians of sporting movements that have inherent potential to create positive change. To realise this potential, it is essential that respect for human rights be embedded within governance and operations. It is only by realising this potential that sport can truly live up to its values of integrity, equality and fair play.

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.

Many sport bodies have taken the first steps of publically committing to respect human rights; however, many more have yet to do so. A world of sport that fully respects human rights will require all in the world of sport to make such commitments and follow through with robust processes - the Human Rights Playbook series is designed to support in doing just that.

We encourage all actors in the world of sport to make and to strengthen their commitments to human rights - this is the first crucial step in

ensuring the world of sport makes a meaningful contribution to advancing human rights.

The Centre for Sport and Human Rights stands ready to support any sport body around the world needing support in implementing this guidance. By working collaboratively on these issues our chance of ensuring harm free sport for all can only be enhanced.

Peggy Hicks

Director, Thematic Engagement, Special Procedures and Right to Development Division - OHCHR



FOREWORD

BY ALLAN JØRGENSEN, OECD

Sport governing bodies are essential actors in society: through their role in making sport available to millions of people every day, they positively support social relations, improve global health, provide entertainment, and much else.

Sport is also a multi-billion industry, for example selling tickets and broadcasting rights to sporting events, signing sponsorship deals, employing dozens of persons and contractors, and commissioning vast investments in infrastructure, among other activities.

Sport governing bodies play a central role in these activities, driving them and profiting from them (even when much of that profit is reinvested in future activities or redistributed to member organisations), and this comes with an increasingly strong expectation from many actors – from governments to athletes and to fans – to account for the risks and impacts on people and the planet that these activities may have. For example, the carbon footprint of mega-sporting events is well-documented. Likewise, organising mega sporting events has been shown in certain cases to be linked to poor working conditions and other human rights abuses. Finally, recent scandals have also indicated that the sports industry has sometimes been a breeding ground for corruption.

The OECD is committed to ensuring that all sectors of the economy make a positive contribution to economic growth and development and become a powerful driver for sustainable development. The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct ("OECD Guidelines") are recommendations from governments to multinational enterprises. They aim to encourage the positive contributions enterprises can make to economic, environmental and social progress, while minimising adverse impacts. The OECD Guidelines sit next to the UN Guiding Principles on Business and Human Rights and the ILO Tripartite Declaration on Multinational Enterprises and Social Policy as part of the international framework for responsible business.

Sport governing bodies can and should avail themselves of these international standards. This Human Rights Playbook: Integrating Human Rights in the Governance of Sport Bodies is very timely in this regard, as many sports governing bodies are transitioning towards sustainable models. It is well aligned with the principles of the OECD Guidelines – in particular its risk-based due diligence process, also called for by the UN and ILO instruments – and puts them in perspective for the world of sport. I am convinced that it will aid sports governing bodies to lead by example and ultimately promote and ensure that sport continues to delight us all, whether athletes, fans or volunteers, and deliver benefits for people, planet and society*.

Allan Jørgensen

Head of the OECD Centre for Responsible Business Conduct



*The opinions expressed and arguments employed herein do not necessarily reflect the official views of the Member countries of the OECD.

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OVERVIEW

OBJECTIVES

This guidance is designed to support Sport Governing Bodies (SGBs) in fulfilling their responsibilities to respect and promote human rights throughout their day-to-day operations.

Using this document will provide an SGB with greater clarity on:

- Why human rights are important
- How to make human rights commitments in sports governance
- What key human rights risks and issues are of relevance to sports bodies
- What actions can be taken to address and promote human rights
- How to work with other partners to protect, respect and promote human rights.

SCOPE

This guidance is specifically relevant to those individuals responsible for governing, managing and administering SGBs and delivering the organisation's plans and objectives.

SGBs serve many functions and vary considerably in terms of their size and scope. This guidance, therefore, addresses operational activities and day-to-day management. It focuses on the potential human rights issues that may arise as a result of these activities and provides guidance on how SGBs can manage these issues.

It is not intended to be a guide as to the design and delivery of mega-sporting events that SGBs own, award or participate in.

WHY SGBS SHOULD TAKE HUMAN RIGHTS SERIOUSLY

- ▶ **Awareness of the links between sports and human rights is growing**
Increasing attention is being paid to the potential human rights impacts in the world of sport. Recent exposés include examples of sexual abuse of young athletes by coaching staff, athletes being discriminated against by the public or prevented from competing, or workers in sports supply chains not being paid or working in unsafe conditions. These have all increased awareness that SGBs and others may be linked to potential abuses that they can no longer ignore.
- ▶ **Failing to take action may have consequences**
If and when an alleged human rights issue is identified, there are potential significant implications for an organisation if they cannot demonstrate that they have undertaken appropriate steps to try and address the concern that has been raised. In such situations, an SGB could be embroiled in lengthy and expensive legal proceedings. Equally, such complaints may lead to a breakdown in trust with the SGB among the public, leading to less engagement and participation in sports. This would also have negative consequences on opportunities for funding from national sports bodies or partnerships with sponsors.
- ▶ **Increasing expectations that sports bodies should take responsibility**
The increase in awareness of the linkages between human rights issues and sports has led to a clear change in the way that sport governing bodies, but also other partners are looking at this issue. Human rights are now explicitly called out and referred to in sports bodies' organisational policies and standards and are even becoming central to the bidding process and contractual requirements associated with hosting events. Therefore, the proactive integration of human rights into SGB operations opens up more opportunities, such as being able to take advantage of being a "first mover" and new engagements with leading sponsors and partners.
- ▶ **SGBs are uniquely placed to promote human rights**
All SGBs interact with a diverse group of people through their work, either directly or indirectly. This includes athletes, children and young people, the elderly, volunteers, contracted workers, workers in supply chains, journalists etc. Whilst these interactions may negatively impact on people without proper protections in place, with proper protections there are clear links to the benefits that sports can bring to these groups. By preventing harm, an SGB can improve their reputation among local communities, which could in turn lead to greater participation and engagement.

USING THE GUIDANCE

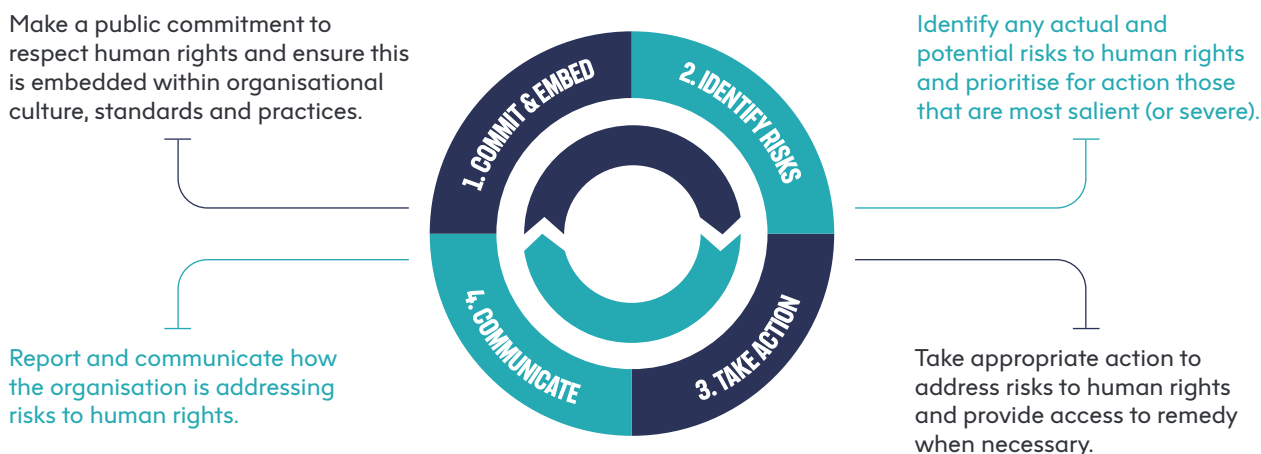
The guidance follows the four primary steps set out in CSHR's guide on Championing Human Rights in the Governance of Sports Bodies (see Figure 1). These are the same steps involved in the human rights due diligence process outlined in the UN Guiding Principles on Business and Human Rights (UNGPs) – the main international framework concerning organisations' responsibilities in relation to human rights. This UN framework applies as well to the work of sports bodies and can help them promote sporting values and demonstrate respect for human rights in line with international good practice.

It is assumed that users of this guide are already familiar with the UNGPs and have a basic knowledge of what human rights are and why it is important for all organisations to embed respect for these standards in their policies and operations.

This guide looks at the overall process for implementing human rights due diligence consistent with international standards. For specifics on how to write a policy and what should be included, refer to: [Human Rights Playbook: Commit and Embed - Step-by-step guidance on drafting a human rights policy](#).

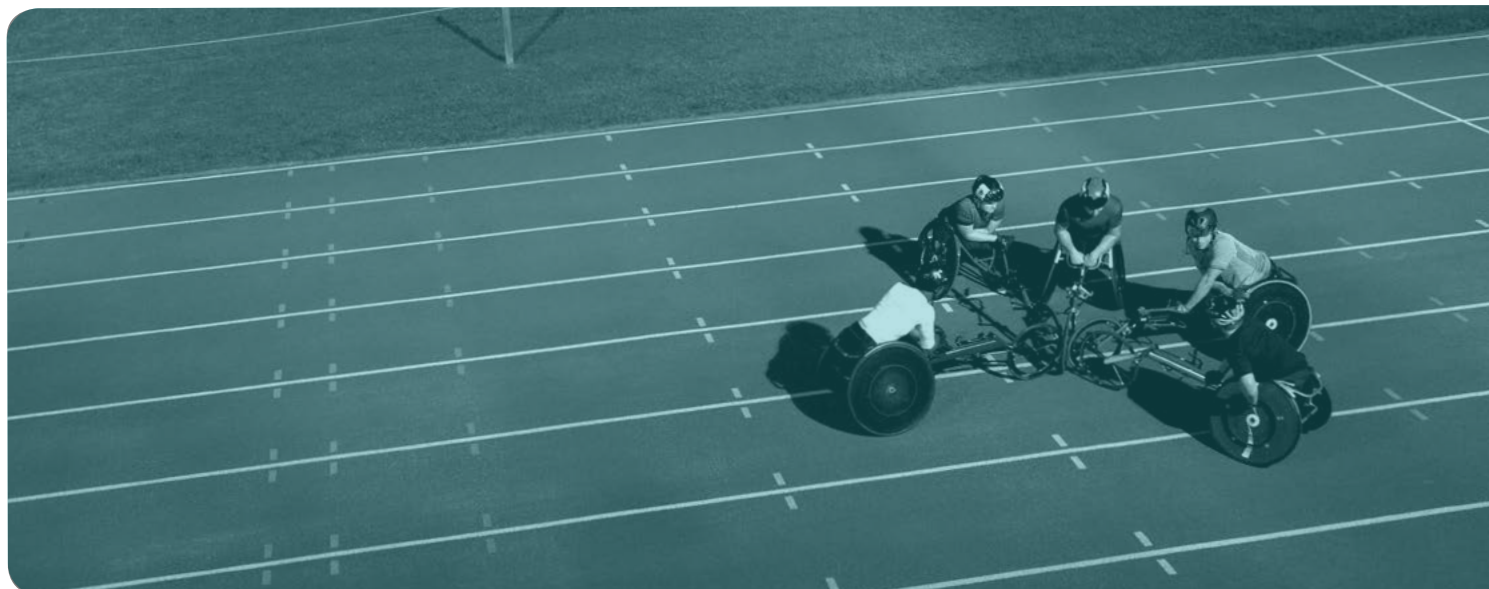
The guidance is designed to be used in a modular manner and provides a menu of options and opportunities to be drawn upon where appropriate and useful, though it may also be read in full as necessary.

Figure 1: 4 Steps of Human Rights Due Diligence for SGBs



Given the variation in size, structure, and capacity of each SGB, no one-size-fits-all approach can be put forward to integrating human rights into an SGB's functioning. Whilst the Championing Human Rights Guide outlined human rights risks in the context of sport, explored why they are essential, and provided an overarching framework to manage them, this guidance sets out simple scalable advice on how SGBs can start to address human rights issues in a manner that is flexible but consistent with international standards.

By the end of this guide, readers should feel confident in understanding how to implement a human rights process that is well integrated within an organisation, though using this guide should not be considered a substitute for stakeholder engagement, nor should it be considered as exhaustive. Every organisation is different, therefore, each organisation's process for developing a human rights approach will differ. For additional support in developing a human rights approach, please contact info@sporthumanrights.org





STEP 1: COMMIT AND EMBED

1. COMMIT AND EMBED

“Make a public commitment to respect human rights and ensure this is embedded within organisational culture, standards, and practices.”¹

Sport bodies may wish to undertake internal processes to increase awareness and capacity of human rights issues and how they relate to their sport.

WHAT DOES THIS MEAN?

Making a human rights commitment is about clearly articulating the core values of your organisation and putting these at the centre of your operational policies. This is the foundation from which an organisation can better respect and promote human rights. Embedding this commitment is about ensuring that actions, processes, communications, and engagements are all designed to place values at the centre of the organisation’s work. Commitments do not always have to start as a complete policy. Human rights policies should articulate everything about how your organisation plans to embed human rights – something you might not have the answer to until a complete due diligence exercise has been completed. Human rights due diligence is cyclical – you can start with a general statement, and revisit your commitment in future, and continue to update it over time.

This helps communicate and respond to the expectations of stakeholders and build trust on this issue with individuals and groups that may potentially be affected by an SGB’s operations.

¹ Championing Human Rights in the Governance of Sport Bodies


WHAT IS INVOLVED?

1.1 Making a commitment to human rights

Human rights commitments are generally articulated in the form of a policy or set of policies. It may be that different issues and affected people are governed by different policies. This is perfectly acceptable.

As no SGB is the same, there is no single human rights policy template which can be applied to all SGBs; however, step-by-step guidance on the general process to follow and to support in this process has been developed and can be found [here](#). Developing policy commitments and embedding them within an organisation's operations provides opportunities to engage with stakeholders. These include getting expert input into the policy's formation, ensuring that key issues are covered, and ensuring there is adequate oversight of human rights work. You may also start with a general commitment to developing this work.

	HOW TO	✓
Define values	Understand what your organisation's key values are and seek to use those as a starting point to inform your human rights approach.	
Analyse what is already in place	Review existing policy frameworks. It is likely that there are already a number of commitments made to human rights through policies on diversity, discipline, human resources, governance, safeguarding, etc. These should be reviewed to see the extent to which internationally recognised human rights are already covered, and which are not.	
	Review International Multi-Sport Bodies' requirements on human rights. All SGBs are likely to follow requirements set in policies and constitutions of International Multi-Sport Bodies and / or Sporting Movements. It is therefore important to review these requirements to ensure internal policies and standards are in alignment.	
Assign responsibility	Ensure that there is an individual responsible for driving the process for committing and embedding. This individual should have sufficient seniority within the SGB to sign off the policy and to get resources assigned for its implementation.	
	Where feasible and relevant to an SGB, consider setting up a cross-departmental steering committee to ensure internal knowledge is adequately captured and to help with dissemination and communication when needed.	

	HOW TO	✓
Draw on human rights expertise	<p>Utilise expert input. Any policy should be informed by the inputs of expert internal and external stakeholders. Where human rights expertise is lacking within an SGB, it will therefore be important to draw on external input which can help ensure it meets the expectations and needs of potentially affected people. Such expert stakeholders may include National Human Rights Institutions (NHRIs), other industry peers, civil society organisations, or consultancies.</p> <p>Trusted external experts should be given an opportunity to review and comment on a draft of the policy / policies. This is important to build a relationship with these organisations to the extent that they may act as a critical friend that ensures practices are robust, and to become useful allies going forward.</p>	
Review & draft	<p>It is important that the policy framework covers key criteria. At a minimum an SGB's commitment to human rights should:</p> <ul style="list-style-type: none"> ▪ Make a clear commitment to protecting and respecting all international human rights and specifically call out those rights issues which are most salient to the SGB (see Step 2 for more information on this). ▪ Define the individual with assigned responsibility for human rights/ responsibility for overseeing each relevant policy. ▪ Ensure all key business partners and relevant stakeholders are covered by the policy framework (e.g., National Federations, suppliers, contractors, clients, sponsors etc). ▪ Stipulate how the SGB plans to embed and implement its commitments through risk identification and prevention of identified salient issues. ▪ Define a process for reviewing the policy with assigned timings and responsibilities. 	

Additional resources

For more detailed step-by-step guidance and technical support on developing a human policy, see the other tool in the Human Rights Playbook series: [Commit and Embed - Step-by-step guidance on drafting a human rights policy](#).

1.2 Embedding the commitment

Once the policies and standards on human rights have been identified, it is crucial to embed these in relevant statutes and practices that govern the SGBs' operations and relationships. This will drive how effectively the SGB can address human rights impacts which may arise directly or indirectly from its operational activities. Whilst understandable attention focuses on SGBs before and during specific international events, embedding these principles needs to take place on an ongoing basis.

 HOW TO	✓
<p>Train key management personnel on the newly amended/developed policies alongside what this means for their job, how it relates to them, and why it is important. For personnel with specific responsibilities as determined in the policies, ensure they are sufficiently trained on the processes involved.</p> <p>Training may be led by expert third parties or led internally, codified through the development of professional guidelines.</p>	
<p>Update and amend codes of conduct for SGB personnel and business partners which reflect newly determined requirements.</p>	
<p>Ensure that SGB commitments are communicated to and become contractually binding in agreements with third parties. This is especially important where the impacts associated with an SGB activities are indirect. This means that adherence to those identified commitments should be included as requirements in organisational statutes, commercial contracts, regulations governing relationships with National Federations, athlete contracts, guidelines etc.</p>	
<p>Include the topic of human rights (or your organisational values underpinned by human rights) as regular agenda items in conversation with sports members. This should include regular discussions on human rights to improve awareness of the issues and to help encourage and promote action.</p>	



STEP 2: IDENTIFY RISKS

2. IDENTIFY RISKS

“Identify any actual and potential risks to human rights and prioritise for action those that are most salient (or severe).”²

WHAT DOES THIS MEAN?

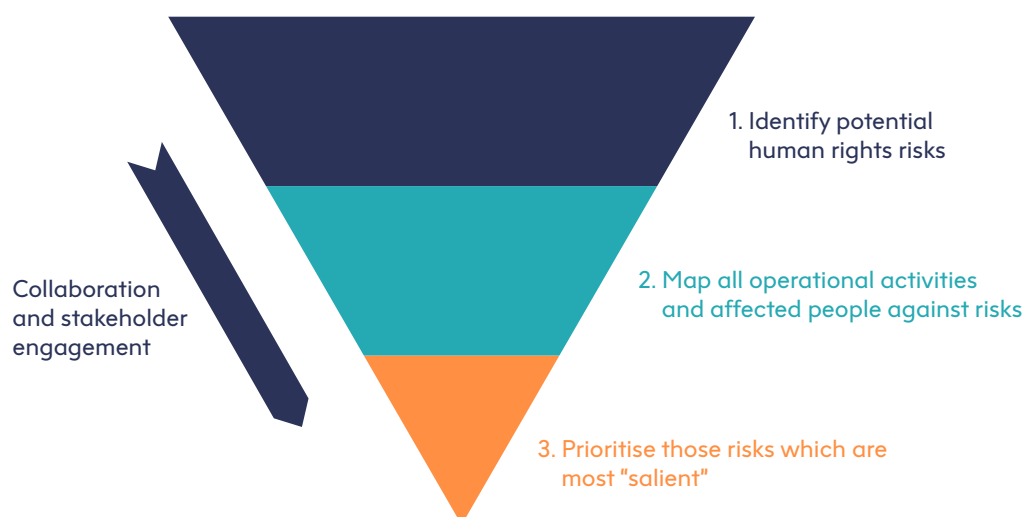
SGBs should proactively identify ways in which their activities and relationships with others may cause or contribute to harm to people. This approach means focusing on how individuals and groups, including athletes, workers, local communities, and others, may be adversely impacted. It does not mean focusing on risks to the organisation (although identifying human rights risks will likely assist organisational assessment of broader risks and how they may be better managed). Proactively identifying human rights risks is a fundamentally important step in an SGB's efforts to protect and respect human rights and support good governance.

Effective human rights risk assessment will require SGBs to have systems, or processes, in place whereby they can proactively identify potential negative impacts that may affect people due to their activities and their organisational relationships. Once risks are identified, those most “salient” (see below for explanation) should be prioritised for action to ensure these issues are addressed.

WHAT IS INVOLVED?

SGBs can follow a simple process to help identify and prioritise those areas and issues which require more focus and attention.

Figure 2: Risk identification and prioritisation process



2.1 Identifying potential human rights risks

At the outset of a risk assessment, it is important to understand the risks in the SGB's operating context and potentially within its scope. This provides important contextual information to better understand which issues are most relevant in a particular operating context.

An initial assessment can be carried out by undertaking a desk-based review using publicly available sources. Perhaps a more resource-effective and efficient approach, however, and one which will draw on the expertise of others and the views of potentially affected groups, is to engage with relevant third-party experts. This can work well through carefully facilitated meetings and workshops, which give participants the chance to explain their points of view and provide information. The outcome of such an assessment will be a clear overview of key legal and enforcement gaps, those issues which are likely to arise in the relevant SGB country, along with a clear picture of some specific groups that are more vulnerable to abuses than others.


	HOW TO	✓
Review the regulatory environment	Undertake a review of the national legal framework, both in the country where the SGB is based, and in countries where the SGB might have operations or events. This is important as it will provide an understanding of which human rights have sufficient protections under national law and which do not, therefore pointing to particular issues which may require further attention by the SGB.	
	Undertake a review of national enforcement of human rights laws. This is important as it will provide greater clarity on what rights, or which people, actually receive their legally afforded protections. And again, will point to those issues which are less well governed and thus may require additional SGB attention.	
Review reported high risk issues	<p>The identification of legal and enforcement gaps is a key step towards identifying potential risks.</p> <p>To do this effectively, publicly available information may be sought, but direct stakeholder input from human rights experts will be invaluable, as they will not only help set out what the key issues are and who is most likely to be affected, but also what the drivers of this are.</p>	

Figure 3: Resources to support the risk assessment process

- ▶ The country level [Human Rights Reports](#) of the various UN institutions provide annual updates on key human rights issues in almost all countries, including a review of national law and practical risks.
- ▶ The [Business and Human Rights Resource Centre](#) compiles news related to human rights issues across the world. This can be searched on a country-by-country basis.
- ▶ International human rights organisations such as [Human Rights Watch](#) and [Amnesty International](#) compile human rights reports for most countries.

2.3 Prioritise the most salient risks

Having completed the wider risk assessment, and mapped these against operational activities, the view of how operational activities potentially impact on people and groups should be clearer. The list of potential risks and issues may be quite long. Whilst it is important for an SGB to try to protect and respect the rights of all affected individuals, it is also reasonable that priority is given to those most salient issues. This is particularly relevant to SGBs that may have more limited capacity and resource.

“Saliency” is a term used to measure both the severity of a particular issue (i.e. does the impact lead to irremediable consequences such as loss of life or limb) versus the likelihood of that impact occurring. This concept of saliency looks at risk through the lens of affected people rather than risks to the organisation.

It is therefore those most salient risks which should be prioritised for action. Other risks that are less salient may be so because the regulatory environment ensures better protections of those issues or may not be considered likely to occur.

To help make this decision, using the grid below to help organise and prioritise findings is useful.

Figure 5: Saliency assessment tool



THE ROLE OF STAKEHOLDER ENGAGEMENT

Engagement and collaboration can assist and strengthen human rights due diligence integration into operational activities. Stakeholder engagement is central to good organisational governance and is underpinned by international standards and guidelines intended to assist organisations in respecting human rights as part of their operational practices.

An important first step in the stakeholder engagement process is to thoroughly review the stakeholders that could be engaged. These may be individuals or organisations, both internal and external, as well as people or groups who may be potentially affected by the organisation's activities and relationships. Some examples of stakeholders that may be relevant to an SGB are set out below. See Annex 1 for an overview of why different stakeholders may be useful to engage.

Once stakeholders have been identified, it is essential to think about why they should be consulted and how to do this. Notably, the extent to which stakeholders are engaged and in what forms will depend on the risks, impacts, capacity, relationships, and other related factors, including:

- Their legitimacy as an individual or group
- Their willingness to engage
- Their knowledge or expertise of the issues in question, and
- Whether they have any direct contact to affected or vulnerable groups

CHECK: KEY QUESTIONS TO ASK ON RISK IDENTIFICATION

What are the potential risks to people? How do these link to operational activities?

Which stakeholders are or could be affected by this decision or its implementation? In what ways?

- Have we considered all potential categories of affected stakeholders (e.g. athletes, officials, fans, volunteers, workers, journalists or local community members)?
- Are we basing our assessment just on past impacts (things we know have happened) or are we also considering new risks?
- Have we considered impacts that the SGB might cause or contribute to through this decision as well as impacts that might be caused by third parties, but which would still be linked to the SGBs' operations?
- Have we considered the full range of human rights impacts that could occur?

Which stakeholders are likely to be more vulnerable to, or more severely affected by, a negative impact as a result of this decision or its implementation?

- Have we considered how diversity within broader categories of affected stakeholders could heighten the impact – for example, if a decision affects athletes, how will it affect women, LGBTQI+ athletes, young athletes, or athletes from racial or ethnic minorities?
- Have we consulted with affected stakeholders and/or their legitimate representatives directly through a trusted mechanism? If not, have we at least consulted with credible proxies who can provide insight into their views through a trusted mechanism?

What steps were taken to identify these risks? Do we need additional information?

- Are we relying on a variety of well-informed resources?
- Do they include credible assessments of broader contextual (i.e., country) risks (e.g., de facto discrimination against women, high corruption risks leading to misuse of project funds), and how those could interact with our decision and its implementation?
- Who was engaged to identify these risks and how was it decided that they would be consulted?

Applying the lens of severity of harm to people, how should we prioritise the risks for attention?

- If we have limited resources, have we focused on the risks that may pose the most severe harm to people understood on the basis of their scale, scope and the potential to remedy the harm?
- Have we ensured that all severe risks are prioritised for attention, even if they are very unlikely to occur?
- Have we tested our proposed prioritisation with expert stakeholders? ►►

Do we have a process for updating our risk assessment?

- If the risk picture changes, do we have systems that will alert us, including the existence of mechanisms through which affected stakeholders can raise concerns? Do we know if stakeholders trust these mechanisms?
- Does new information trigger a review of relevant human rights risks? How?
- What ongoing processes exist to continually engage potentially affected groups?





STEP 3: TAKE ACTION

3. TAKE ACTION

“Take appropriate action to address risks to human rights and provide access to remedy when necessary.”³

WHAT DOES THIS MEAN?

During a risk assessment process, SGBs will have a better understanding of where their risks lie and will need to think about how to proactively address these issues. Actions to address risks can vary from developing policies and procedures, undertaking trainings, or amending contractual controls and obligations. The main thing is that SGBs have established procedures to reduce the likelihood of the issue occurring and to improve the chances that they can manage the issue if it does arise.

Additionally, an SGB may have all the best mitigating measures and practices in place to prevent people from being harmed by them and their associated activities, but it is still possible for people to be harmed or perceive that they have been harmed. To counteract this, it is important that whistleblowing and complaints processes are in place, which can both notify the SGB of particular issues and also play a role in providing remedy to those who have been harmed. Providing remedy essentially means taking corrective action when something goes wrong. It will be explored further in Step 3.3 below.

WHAT IS INVOLVED?

To take action, it is important that an SGB understand the parties actually involved versus those who should be involved in addressing issues. This helps map where opportunities lie to influence and leverage other parties to mitigate and address any issues. In an event where a harm has already happened (for example, a former athlete comes forward with an allegation) an SGB should consider how they can play a role in ensuring that the necessary actions are taken to prevent further harm and correct any wrongdoings.

³ Championing Human Rights in the Governance of Sport Bodies

3.1 Agree on responsibility and actions against risks


During the risk assessment process, an SGB will identify which risk issues are likely to be caused directly by the organisation itself and which may arise indirectly because of the activities of others linked to them (such as national sporting bodies, suppliers etc). Given that an SGB can have both direct and indirect impacts, it is important to use the risk assessment process to start thinking about who should be assigned responsibility for managing the issues. Those responsible may include a group consisting of SGB personnel along with other relevant stakeholders such as National Federations.

For example, during the preparations for an international competition an SGB may be working closely with National Federations, competition organisers or other grassroots sporting bodies to ensure that athletes are making appropriate progress and preparations. However, the multiple actors involved in doing this can lead to confusion about who is responsible for athletes' wellbeing. Likewise, if a female athlete makes a complaint about a coach that she alleges has harassed her in preparation for the competition, who should be responsible for resolving that complaint? Where do government responsibilities to protect against abuses by non-state actors fit into this?

Depending on the issue, the role of the SGB may be distant from the events themselves. Therefore, it is important to utilise an organisation's ability to influence, leverage and support others that may be closer to the issue and may have had more of a role in causing or contributing to a specific adverse impact.

One useful approach here is to utilise the RACI framework which allows an SGB to map the relevant actors and stakeholders involved and identify who is R - responsible for taking action, who is A- accountable, who should be C - consulted, and who should be I - informed. To determine this, it is useful to consider the following points to help make decisions on responsibilities different stakeholders should take. See Annex 3 for a template. Where responsibility and actions are identified, these may be captured in an action plan. See Annex 4 for a template.

Table 1: Considerations when determining responsibility

 RACI	ROLE	WHAT TO CONSIDER WHEN MAKING A DECISION
R = Responsible	Those responsible for implementing or carrying out this action/activity	<ul style="list-style-type: none"> Organisation has caused or contributed to an identified harm Organisation/person is legally responsible for taking action Organisation/person can directly address an issue or they have the power to influence other parties to take action
A = Accountable	Those overseeing this action/activity	<ul style="list-style-type: none"> Organisation/person is legally liable for an identified risk or harm
C = Consulted	Those who may have information relevant to this action/activity	<ul style="list-style-type: none"> The views of the person/organisation reflect wider group of affected people The person has been negatively affected by related SGB activities The organisation has expertise and experience in addressing this issue
I = Informed	Those who should be kept informed about this action/activity	<ul style="list-style-type: none"> It is important for this organisation/person to know what is happening, but they do not need to provide inputs



3.2. Example mitigation steps

NON-DISCRIMINATION & HARASSMENT				
KEY ISSUES AND EXAMPLE RISKS	Athletes may be given preferential treatment, (benefitting from improved training facilities, travel arrangements etc) based on their personal characteristics	Athletes may be, or may perceive that they are, discriminated against in the selection process	Fans may be harassed, including by other fans, when attending sporting events	Journalists may not receive accreditation based on disagreements with their tone of reporting
POTENTIALLY AFFECTED PEOPLE	<ul style="list-style-type: none"> ▪ Athletes and competitors – particularly those from more vulnerable/marginalised groups (including women, minorities, para athletes etc) ▪ Fans ▪ Journalists 			
POTENTIALLY RESPONSIBLE PARTIES	<ul style="list-style-type: none"> ▪ International Federations ▪ National Multi-Sport Bodies ▪ National Federations ▪ Organising Committees 			
EXAMPLE MITIGATION MEASURES BY SGBS	<p>Develop clear policy on non-discrimination and harassment and communicate to relevant parties (e.g. National Federations or Organising Committees) that they are expected to meet the standards set in this policy (see Step 1 for more on this).</p> <p>Develop and publish clear guidelines on selection criteria and procedures and ensure it has been disseminated amongst prospective athletes. Ensure that those responsible for selecting athletes have received training on principles of non-discrimination set out in the guidelines.</p> <p>Review governance structure to ensure sports bodies include athlete representatives from otherwise marginalised groups (e.g. women, ethnic minorities, etc).</p> <p>Establish clear channel through which aggrieved athletes may raise complaints related to discrimination and/or harassment. Ensure this procedure and the complaints handling process meets the criteria of effectiveness (see Step 3.3).</p> <p>Engage with Organising Committees to understand how athletes' wellbeing is safeguarded during training and events.</p> <p>Engage with local government authorities and police to understand how they currently deal with serious cases around sexual harassment. Where credible, establish procedure for escalating cases of criminal conduct (e.g., sexual harassment) to appropriate local authorities.</p> <p>The IOC has developed a toolkit which SGBs may consider to safeguard athletes from harassment and abuse in sport.</p>			
POTENTIAL OPPORTUNITIES	Selection processes that are fairer, or are perceived to be fairer, can build trust in the sports body among athletes.	A more diverse range of athletes or representatives in senior management can create role models for otherwise marginalised groups and can heighten their status in society, helping ignite social change.	Improved protections for athletes will help them maintain focus during competition and to perform to a higher level.	



RIGHTS OF CHILDREN AND YOUNG PEOPLE

KEY ISSUES AND EXAMPLE RISKS

Child athletes attending competitions may be exposed to abuse from fans, by coaches or other official personnel.

Child athletes may be pressured to take performance enhancing drugs, spend too much time away from their education or to not raise complaints about their treatment in order to secure competition space.

Child athletes and young community members may be exposed to online marketing and social media pressures that damage their mental health.

Children participating in sports may be required to undergo physically and emotionally traumatic hazing.

Poorly managed community programmes may damage health and educational outcomes for young people.

Social media content and abuse or negative content may undermine children's mental health.

Child labour may occur in the supply chains of sporting equipment, kit, and merchandise.

POTENTIALLY AFFECTED PEOPLE

- Child and young athletes
- Young community members
- Underage workers

POTENTIALLY RESPONSIBLE PARTIES

- International Federations
- National Multi-Sport Bodies
- National Federations
- Organising Committees
- Local sports clubs and teams
- Parents and community members
- Local Authorities
- Suppliers

RIGHTS OF CHILDREN AND YOUNG PEOPLE (CONTINUED)

EXAMPLE MITIGATION MEASURES BY SGBS

When engaging with children in sport, always act in the best interests of the child, remembering that they are a child first and an athlete second.

Develop a clear safeguarding policy and procedure to cover risks faced by young athletes and other children and young people that interact with SGB operations. Once developed, steps should be taken to implement and embed the policy. This should ideally be developed in consultation with child rights / safeguarding experts.

For more specific guidance on the above see [this useful resource](#), which provides detailed guidance on developing policies and procedures, guidelines for behaviour, minimising risks, engaging with partners, monitoring and evaluating.

Work with National Federations and other grassroots sports bodies to protect children from violence and abuse by running awareness raising programmes with children, their parents, clubs, and teams. An SGB is well placed to cascade this throughout other sports bodies at a national and grassroots level.

Appoint coaching, medical and supervisory officials that are appropriately qualified with relevant skills. All staff working with young people should be subject to background checks related to any previous abuses. See the [Child Protection in Sport Unit's guidance](#) on safe recruitment and selection. This applies to the UK, but the principles are applicable more widely.

Assign individuals with overall responsibility for safeguarding child athletes during Games Time. This person should be properly trained in defined safeguarding procedures and protocols and all athletes on the team should be aware of this person's role and responsibilities.

Include specific prohibitions of child labour in contracts with suppliers and contractors.

For more on how to integrate children's best interests into operational activities, see the [Children's Rights in Sport Principles](#).

For a useful [resource bank](#) related to child rights in sport, see the Child Protection in Sport Unit of the NSPCC in the UK.

POTENTIAL OPPORTUNITIES

Increased engagement and participation in sport by young people as a result of sensitive marketing campaigns, fewer barriers to engagement and more inclusive participation.

Increased sports participation can help empower young people and provide them with a greater sense of purpose, helping reduce crime etc.

Healthier, less pressured young athletes are more likely to perform to a higher standard.

Promoting the rights of children amongst the wider population through awareness raising and promotional programmes.

WIDER COMMUNITY

KEY ISSUES AND EXAMPLE RISKS	<p>Inappropriate marketing campaigns or social media content reinforces negative stereotypes of marginalised groups or reinforces divisions in society.</p>	<p>Specific communities may be given less opportunity to participate in or engage with sports events.</p>	<p>Local communities around events may be negatively affected by the hosting.</p>
POTENTIALLY AFFECTED PEOPLE	<ul style="list-style-type: none"> ▪ Women ▪ LGBT people ▪ Persons with disabilities ▪ Indigenous communities ▪ Other minorities and disadvantaged groups 		
POTENTIALLY RESPONSIBLE PARTIES	<ul style="list-style-type: none"> ▪ International Federations ▪ National Multi-Sport Bodies ▪ National Federations 		
EXAMPLE MITIGATION MEASURES BY SGBS	<p>Establish defined marketing and communications protocols that are sensitive to and respectful of views and position of marginalised groups. The IOC has developed this useful resource to help provide a gender balanced representation in communications and media.</p> <p>Ensure that there is public consultation on activities that are likely to have wider community impacts to ensure benefits from the activities are spread more widely. Similarly, engage with local authorities and communities to understand how sports facilities can be developed and upgraded to add wider benefit and use beyond the sports event.</p> <p>Ensure communities are given preferential access to events and games in their local areas.</p>		
POTENTIAL OPPORTUNITIES	<p>Selection processes that are fairer, or are perceived to be fairer, can build trust in the sports body among the wider public. This can result in more people engaging in sport and promoting sport.</p>	<p>Promotion of marginalised groups in sport can help overcome negative stereotypes faced by these communities and promote better integration between communities.</p>	<p>Infrastructure development and upgrades to support local sports events can improve local amenities and services.</p>

LABOUR RIGHTS AND STANDARDS

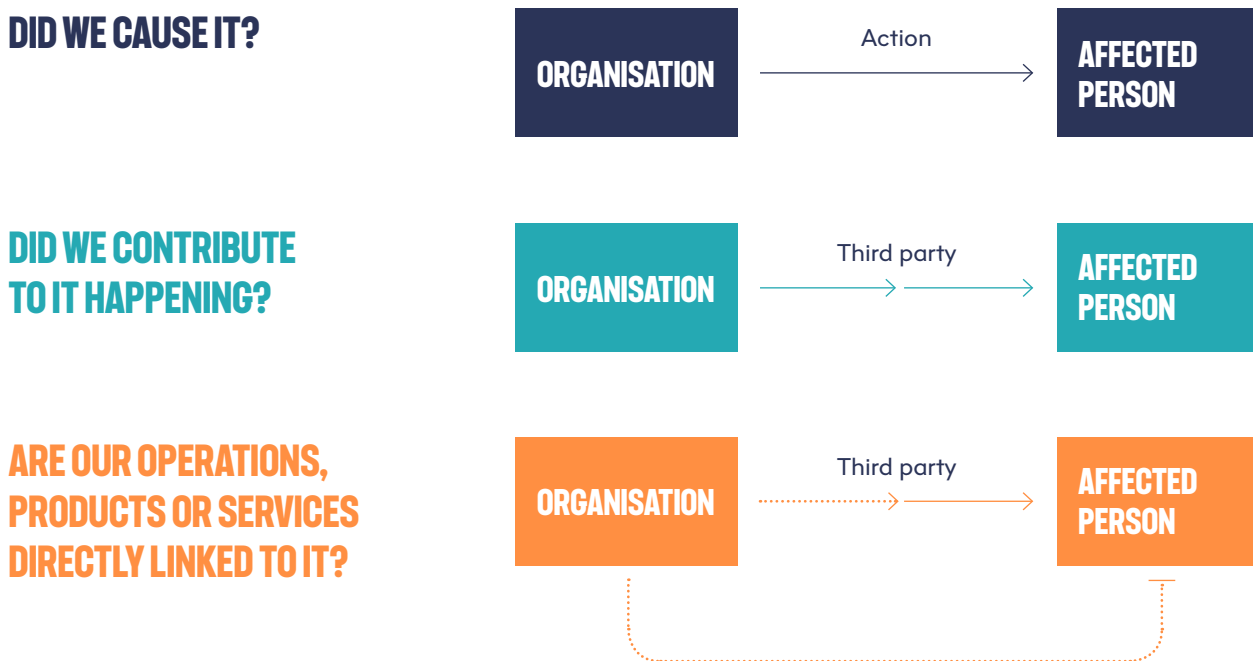
KEY ISSUES AND EXAMPLE RISKS	SGB staff may be discriminated against in recruitment or employment with fewer opportunities to progress for specific groups.	Workers employed by kit manufacturers may experience harsh treatment, poor working conditions or even forced labour.	The contracted workforce during events is required to work excessive hours and are paid below the legal minimum.
	Volunteers sent to events and games may be harassed by event organisers, security, fans or others.		All above worker types may lack access to effective remedy.
POTENTIALLY AFFECTED PEOPLE	<ul style="list-style-type: none"> ▪ SGB employees ▪ Workers employed by suppliers ▪ Workers employed by contractors ▪ Volunteers ▪ Athletes 		
POTENTIALLY RESPONSIBLE PARTIES	<ul style="list-style-type: none"> ▪ International Federations ▪ National Multi-Sport Bodies ▪ Sponsors ▪ Suppliers of goods ▪ Contractors (security, cleaning, transport etc) ▪ Local Organising Committees 		
EXAMPLE MITIGATION MEASURES BY SGBS	<p>Develop and implement workplace complaints process in line with the effectiveness criteria set out in Step 3.3. This should also be open to receiving complaints from volunteers alongside contractor and supplier workers.</p> <p>Review tender and contracting documents to ensure that there is specific reference to core international labour standards, as set out by the International Labour Organization.</p> <p>When reviewing bids from contractors, take into account history of managing labour issues along with existing procedures and policies for managing these issues.</p> <p>Require suppliers and contractors to provide periodic information on labour management practices, including wages and hours etc. Where this is deemed to be inadequate or where allegations about their conduct with workers have been made, commission an expert audit of their facilities to verify. These should be carried out in line with good practice methodologies, such as SA8000.</p>		
POTENTIAL OPPORTUNITIES	Better opportunities to a wider pool of staff improves opportunities for career development and helps attract better talent and retain existing staff.	Safer working conditions leading to an increase in productivity and better service delivery in both supplier and contractor sites.	Adequate wages and working hours for workers in supply chains improve work life balance of staff, place less pressures on workers' children to give up education and start working.

3.3 Ensuring remedy is effective

Athletes may perceive they have been discriminated against in the selection process or may experience some form of abuse whilst training or competing. Aggrieved community members may wish to complain about the security perimeters set up around an SGB's event, or other harms they believe have been caused as a result of an SGB's actions or inactions. In all such cases, it is important that there is a channel through which affected people can file complaints and seek appropriate remedy or outcomes for alleged harms.

As discussed above, the SGB may not be the party directly responsible for the negative impact, but they may be linked to it through their relationship with another party, and as such, may also have the power to influence the actions of others or help produce positive outcomes. In the context of the UNGPs, this concept is referred to as "leverage" which reflects the ability of an organisation to effect change in the wrongful practices of another party that is either causing or contributing to an adverse human rights impact. Below is a diagram summarising an organisation's potential relationship to a human rights impact.

Figure 6: Understanding human rights impacts





What an organisations' relationship is to the harm, will depend on what actions they are expected to take with regard to remediating the issue. Where an organisation has caused a harm, appropriate action would be to:

- ▶ Cease or change the activities which caused the negative impact
- ▶ Provide for or cooperate in remediation (see below) of the impact through legitimate processes.

Where an organisation had contributed to a harm, they would be expected to:

- ▶ Cease or change the activities which contributed to the negative impact.
- ▶ Use leverage to mitigate any remaining impact to the greatest extent possible.
- ▶ Provide for or cooperate in the remediation of the negative impact you contributed to through legitimate processes.

Finally, if an organisation was found to be directly linked to a harm, it would be expected to:

- ▶ Use or increase leverage to encourage the prevention or mitigation of the impact.
- ▶ The organisation is not primarily responsible for the negative impact and therefore does not have to provide for remediation (although it may choose to do so).

Providing for remedy is therefore a critical part of an organisation exercising leverage and correcting any wrongdoing. Any effective complaints procedure set up by an SGB should allow for complaints to be captured, investigated, or mediated, and escalated, and for appropriate remedy to be delivered to the concerned party. It should be noted that this does not necessarily have to be done by the SGB itself. Severe abuses, particularly cases of criminal acts, will likely require State action and should involve judicial systems. What issues an SGB is responsible for depends on the SGBs involvement in the harm. For any remedy mechanism to be considered effective, it is important that the UNGPs effectiveness criteria are met.

Table 2: Effectiveness criteria for remedy

LEGITIMATE	PREDICTABLE	TRANSPARENT	A SOURCE OF CONTINUOUS LEARNING
ACCESSIBLE	EQUITABLE	RIGHTS-COMPATIBLE	BASED ON ENGAGEMENT & DIALOGUE

In practice, this means that the complaints mechanism and its outcomes must overcome specific challenges to ensure people are aware of the mechanism and how to access it, trust it to not undermine them further and deliver a fair outcome. To help do this, SGBs can think about the following practical considerations when developing or reviewing their own complaints processes.



 IMPROVING EFFECTIVE REMEDY	✓
Review the existing landscape of potential remedy provided by the State, International and National Federations. Where possible, especially with State-based mechanisms, seek to strengthen and support those processes rather than undermining them.	
Reflect socio-cultural concerns related to vulnerable groups in the design of the mechanism, including consultation with these groups and other experts about how this should be developed.	
Designate a trained individual with responsibility for assessing and leading on the investigation of complaints. This person should have sufficient understanding of SGB human rights standards and requirements.	
Document the complaints procedure and make sure it is publicly available.	
Allow for complaints to be raised anonymously as some complainants will feel uncomfortable providing their details in fear of retaliation.	
Regularly communicate the existence of the mechanism and process for complaints handling with target users.	
Reinforce confidentiality and non-retribution along with ability to raise anonymous grievances during engagement with athletes in particular.	
Reduce physical barriers to accessing the mechanism by allowing for complaints to be raised and received through multiple channels (e.g., in person, by phone, online, post, through media reports).	
Provide complainants with timely feedback about the scope of the potential response, the status of their complaint and give them opportunities to ask questions about process, timing etc.	
Where possible, engage with complainants in determining what appropriate remedy should be. Effective remedy should counteract or make good the adverse impact. Broader consideration should also be made to address the underlying causes of the harm to prevent future occurrence.	
Publish the outcomes of the complaints process (ensuring sensitive information is not disclosed) to help build awareness and trust in the process.	
Where complaints relate to other organisations linked to SGB activities, engage with them as part of the investigation to collect information and understand their perspective. Always maintain the complainant's confidentiality.	

RESOURCES TO SUPPORT COMPLAINTS HANDLING

The IOC has developed a [number of tools and resources](#) that NOCs can use to develop complaints processes that deal with sexual harassment and abuse. This includes e-learning programmes and guidelines for complaint handling. This is likely also relevant to other SGBs that are not also NOCs.

Play by the Rules has developed a [series of tools](#) that sporting clubs and organisations can use to help them deal with complaints. This may be useful to SGBs to share with relevant affiliates to support their own complaints handling.

Recognising the challenge of access to effective remedy within sport, the Centre for Sport and Human Rights has developed a [Roadmap to Remedy](#) series featuring guidance on working with Affected Persons and on conducting investigations into complaints of abuse in sports

3.4 Develop a process to provide remedy

To deliver effective remedies for any harm caused, SGBs should establish a defined procedure for receiving, handling, and resolving complaints.

1. **Receiving** An SGB must have a channel or multiple channels through which complaints can be received.
2. **Receipt** Once complaints are received, the complainant should be informed of this with some form of confirmation.
3. **Assessment** The complaint should then be evaluated to assess its nature along with its severity. This should determine whether the complaint is handled internally, whether it is severe enough to be referred on to experts or authorities, or whether it is in scope or not.
4. **Investigation** If being handled internally, the nature of allegations should be investigated, including what remedy is being sought and whether remedy should be provided.
5. **Remediation** Where remedy is being provided, this may include apologies, rehabilitation, financial or non-financial compensation, punitive sanctions (whether criminal or administrative, such as fines), and the prevention of further harm.
6. **Monitoring** Aim to ensure that grievance procedures are effective and remedial action is being implemented.

CHECK: KEY QUESTIONS TO ASK TO TAKE ACTION

**What safeguards do you already have to prevent or mitigate the identified risks?
What additional measures could you put in place?**

- Can you explain how these existing or new measures should connect to better human rights outcomes for people – i.e., what is your theory of change? (For example, if you are proposing to carry out training on the importance of preventing harassment and abuse, what specific behaviours are you trying to encourage, by whom, and how can you be confident that they will connect to a reduction in and/or reporting of harm?)
- What evidence do you have for thinking that these measures will be effective in practice? Are there measures in place to track the effectiveness of measures taken?
- How do the measures you are proposing compare to the severity of the risk to affected stakeholders – are they proportionate in the circumstances?
- How does what you are proposing compare with leading practice across other sports (or other sectors) in addressing similar human rights risks?
- Do any of the risks identified merit their own policy? (For example, if your federation has an extensive supply chain, it may be necessary to create a Supplier Code of Conduct to ensure that each supplier is aware of their obligations to you and conduct monitoring visits to ensure that your suppliers are achieving your standards)

If you are seeking to mitigate risks or address impacts involving third parties, how can you use leverage with them?

- What existing leverage do you have with the third party/parties (e.g., membership, a funding relationship, a contract, an informal relationship) that you could draw on?
- How could you build additional leverage if what you have is not enough to encourage, incentivise or require them to address the risk?
- Have you considered the full spectrum of approaches to leverage, such as:
 - › Providing guidance and practical capacity-building,
 - › Integrating human rights requirements into agreements,
 - › Using behind the scenes political pressure,
 - › Collaborating with other Sporting Movement entities, or with expert or international organisations,
 - › Applying sanctions under your Constitution, Rules and Regulations or disengaging from agreements with commercial partners?
- Can you set clearer requirements (for Member or National Federations, host cities and other third parties) going forwards to standardise expectations and create more leverage?
- If a harm has occurred, how can you use or build leverage to encourage the responsible third party to provide remedy? ►►

If an actual harm has occurred and your SGB has caused or contributed to it, have you met your own responsibility to provide remedy?

- Have you considered the full spectrum of approaches to remedy, such as apologies, restitution (i.e., giving something back that belonged to someone), rehabilitation (i.e., mental or physical health support), compensation, sanctioning (of the persons causing harm) and prevention of future harm?
- Have you engaged with the affected stakeholder(s) about their perspectives on remedy and sought to take that into account?





STEP 4: COMMUNICATE

4. COMMUNICATE

“Report and communicate how the organisation is addressing risks to human rights”.⁴



WHAT DOES THIS MEAN?

SGBs should be prepared to demonstrate how they integrate respect for human rights into their operational activities, including measures they have taken to address specific risks and issues. This is important as it demonstrates to key stakeholders that efforts are being made to meet international standards, reduce negative impacts, and improve the lives of potentially affected people.


Fundamentally, an organisation that communicates what they do enhances dialogue with experts and affected people. This allows an SGB to understand what key stakeholder expectations are and to share learnings with others about what does and does not work, and what good practice looks like.

WHAT IS INVOLVED?

To communicate effectively what an SGB has been doing to address human rights concerns, it is important to ensure the following steps are taken into consideration.

	HOW TO	
Review	<p>At the start of the process, it is important to review the efforts and actions that the SGB has undertaken related to human rights. This may include any development or implementation of policies, risk assessments or specific actions taken.</p> <p>Reach out to colleagues and relevant national/international sports bodies to gather data on what has happened and how this has changed practices. Ideally, this should take place throughout a reporting period rather than just before communicating.</p> <p>Gather all this information in as much detail as possible to understand the processes undertaken to do all of these including who has been involved internally and externally.</p> <p>This should provide a good focus on risks to people that can be communicated and reported.</p>	

4 Championing Human Rights in the Governance of Sport Bodies

	HOW TO	✓
Audience and format	It is important to think about which stakeholders should be receiving information about an SGB's actions on human rights and what the purpose of that communication is. Communication can take many forms, including through dialogue, conferences, sports fora, publications, or formal capacity building / knowledge sharing sessions. It's important to note that it is better to use a form of communication appropriate to conveying a message.	
What to report	<p>When reporting it is important to provide as comprehensive an overview as possible. This can be in the form of a specific human rights report, or a section in another report such as an annual or sustainability report. As far as possible, all reporting should try to cover the following in as much detail as possible:</p> <ul style="list-style-type: none"> ▪ The SGB's governance structure on human rights ▪ Specific processes in place to identify risks and take actions, along with disclosure of specific examples ▪ How stakeholders have been involved and how their perspectives have informed actions ▪ Challenges and learnings ▪ Future objectives and priorities 	



CHECK: KEY QUESTIONS TO ASK TO COMMUNICATE

- Do you report regularly? In what format?
- How do you ensure that there are adequate processes internally for tracking and monitoring the actions being taken to effectively integrate human rights?
- Are you prepared to disclose progress at least against your high-level targets for addressing risks?
 - › Do you proactively explain to stakeholders within the sport the steps you are taking?
 - › Are you able to explain to stakeholders outside the sport what you are doing, when asked?
 - › In all cases, are you prepared to engage with affected stakeholders to provide updates on your efforts where it directly affects them?
- Can you encourage or require third parties to communicate about their own efforts?
 - › Do you expect host cities to be transparent about their efforts to manage risks to people?
 - › Do you expect reporting on management of human rights risks (such as safeguarding) by Member Federations or other relevant parties as a condition of development funding?





ANNEXES




Annex 1: Key stakeholders and why they should be engaged

 KEY STAKEHOLDERS	WHY ENGAGE
SGB Board	<ul style="list-style-type: none"> Creates ownership of human rights work amongst senior management along with the required next steps and responsibilities Secures resource and funding allocation internally
SGB Staff	<ul style="list-style-type: none"> Creates buy in amongst staff who feel that their views and opinions are being taken into account Provides opportunity for concerns to be raised about SGB or related activities
National Federations / National sports bodies (as relevant)	<ul style="list-style-type: none"> Builds awareness of SGB work on integrating human rights into organisational activities and of human rights issues impacted by sports at a national level Captures views on key risk issues from perspective of individuals with more direct links to athletes and other affected people Provides opportunity to set out and agree on responsibilities to manage human rights issues Offers an opportunity to share good practices
International Sports Bodies (as relevant)	<ul style="list-style-type: none"> Ensure commitments and values are in alignment Share good practices and learnings
National Human Rights Institutions / NGOs / International organisations	<ul style="list-style-type: none"> Offers expert support and insight on key human rights risks and issues at a national level. Includes an overview of the strengths and weaknesses of the national regulatory framework on human rights, provides expert insights on specific issues, and can help frame issues within the lens of human rights Inputs will help build trust between the SGB and human rights community Provides opportunity to have a critical friend, aimed at improving practices in a pragmatic manner Their inputs can add weight to an SGB's efforts to engage others
Funders	<ul style="list-style-type: none"> Identify what opportunities there are for an SGB to contribute to other social objectives which are also underpinned by human rights (e.g. community cohesion, integration, education etc). Position the SGB as a trusted recipient of funding
Specific groups identified as potentially affected	<ul style="list-style-type: none"> Provide greater detail and context to how certain policies or processes could be causing harm to further refine risk mitigation processes and improve systems Build trust between the SGB and communities that have been or could potentially be harmed Affected groups can include: athletes, workers/volunteers, coaches/administrators/officials, fans, local communities and journalists among others



Annex 2: Mapping activities and issues

The below grid can be used to map the operational activities of an SGB against people or groups that it interacts with, which may be negatively impacted by the SGB's work.

 OPERATIONAL ACTIVITY	POTENTIALLY AFFECTED PEOPLE	ISSUE
e.g. Selection of athletes	Athletes / young athletes / prospective athletes	Athletes discriminated against (or perceive they are) in selection process
e.g. Organising a World Championships	Local communities / Journalists / Volunteers / Athletes / Workers etc.	Local labour laws in a country hosting a World Championships are not very strict and means that workers around the stadium are not paid a fair wage
e.g. Delivering grassroots development programme	Children / Local communities / Athletes	Insufficient safeguarding measures means that children involved in a local development programme funded by an SGB are harassed

Annex 3: Agreeing responsibility

Once an SGB has carried out its initial stakeholder mapping, it will have a clear idea of the different relevant stakeholders.

However, clarifying who should do what can be difficult, and it is therefore useful to create a RACI Matrix. It is important that responsibility is agreed upon rather than being assigned, both in relation to internal and external stakeholders. The below gives an overview of how to complete a RACI Matrix.

Function	Name the relevant department, function, external organisation
Role in: (RACI-analysis)	For each element of the four steps set out in this guidance, determine whether the identified stakeholder is responsible, accountable, should be consulted or kept informed
R = Responsible	Those responsible for implementing or carrying out this action / activity
A = Accountable	Those overseeing this action / activity
C = Consulted	Those who may have information relevant to this action / activity
I = Informed	Those who should be kept informed about this action / activity
Perceived risks / attitudes	Capture what you think are the key risks in relation to this stakeholder, especially regarding their attitudes about human rights
Objectives for engagement	List what your key objectives are for engaging this stakeholder and what you would like to achieve through this engagement
Contact	Identify a contact person, including contact details and role
Next steps	Identify next steps, especially how and when to contact this stakeholder

To clarify who should do what, the below grid may be used to clarify roles and responsibilities in managing different aspects of a human rights process.

Function	Role in:				Perceived risks / attitudes	Objectives for engagement	Contact	Next steps
	Commit and Embed	Identifying risks	Taking action	Communicate				

Annex 4: Human rights – Risk action plan

#	Identified rights issue	Saliency assessment (high/medium/low)	Associated SGB activities
e.g.	Young athletes harassed by team coach during competition	High	Recruitment of officials and coaches Engagement with Organising Committee
1			
2			
3			
4			
5			
6			
7			
8			

R	A	C	I	Action
HR				Ensure recruitment process for coaches and officials includes background checks on candidates
HR		Athletes	Coaches	Clearly prohibit harassment in a code of conduct
HR		Athletes/ expert	NFs	Develop and implement effective grievance process
Comms		OC		Engage with games organisers to understand safeguarding measures in place and who is responsible
Comms			Athletes	Share information about OC processes and practices with travelling athletes
1				
2				
3				
4				
5				
6				
7				
8				



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