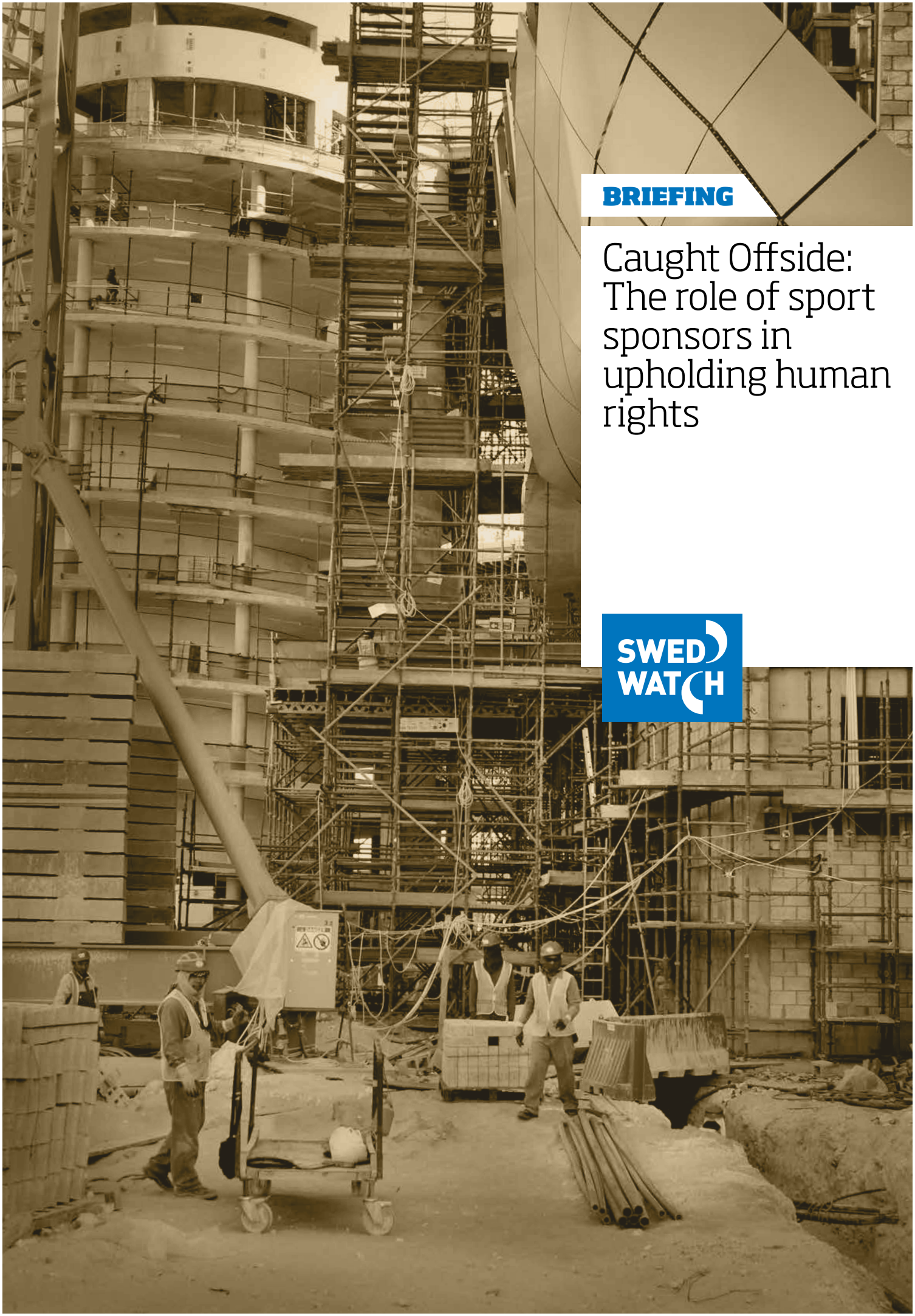


BRIEFING

Caught Offside: The role of sport sponsors in upholding human rights

SWEDWATCH

Swedwatch is an independent not-for-profit organisation that conducts in-depth research on the impacts of businesses on human rights and the environment. The aim of the organisation is to contribute towards reduced poverty and sustainable social and environmental development through research, encouraging best practice, knowledge sharing and dialogue. Swedwatch has seven member organisations: Afrikagrupperna, ACT Church of Sweden, Diakonia, Fair Action, Solidarity Sweden-Latin America, the Swedish Society for Nature Conservation and We Effect. Swedwatch authored this report, which can be downloaded at www.swedwatch.org.

Author: Olof Björnsson
Cover: Joerg Boethling / Alamy Stock Photo
Layout: Åse Bengtsson Helin
Publisher: Alice Blondel
Published: 17 November 2022
ISBN: 978-91-88141-41-5

This report has been financed by the Government of Sweden. Responsibility for the content lies entirely with the creator. The Government of Sweden does not necessarily share the expressed views and interpretations.

Contents

Introduction 4
Recommendations in brief 5
Background 6
Sport sponsorships and human rights 7
Human Rights Due Diligence (HRDD) and stakeholder involvement 8
The bidding process 9
Leverage 12
Remedy 13
Conclusion 15
Full list of recommendations 16

Introduction

Large sporting events have the potential to bring people together, as millions of people from around the world are given the opportunity to enjoy high-quality entertainment. Sports can also promote values like humanity, dignity, solidarity and fair play.[1] Locally, sporting events can create jobs, attract investment, aid development and increase the visibility and image of the hosting country or city.

However, on the flip side, these events can also have significant negative impacts on a wide range of human rights. Impacts can include workplace exploitation, population displacement and land grabbing related to venue construction and infrastructure development. Labour rights violations and other adverse impacts can also occur in the supply chains of goods and services sourced by teams and organisers.[2]

When discussing human rights in this context, the most obvious case that springs to mind is Qatar, where the situation for thousands of migrant workers involved with the 2022 FIFA World Cup has attracted significant global attention. The migrant workers in Qatar, who are building and staffing the hotels and other facilities necessary for making the World Cup happen, are controlled by a mixture of formal and informal practices called 'kafala' that give the employer considerable power over workers.

These practices place workers in an extremely vulnerable position with substantial human rights risks. In many cases, migrants are working under conditions that can be dangerous, sometimes even lethal – with 6,500 workers alleged to have died since the World Cup was awarded to Qatar.[3]

However, the debate about sports and human rights did not start with Qatar. Many other major sporting events have been hosted in countries that have been heavily criticised for their human rights record, including Belarus, Russia and China. Through the hosting of sporting events, these governments aim to project a positive image to the world – a practice often described as 'sportswashing'. However, in reality, workers and other rights holders are often subjected to suppression and exploitation.

None of these major sporting events could be held successfully without the many corporate actors involved – from construction companies building the arenas and hotels, the companies in the hospitality sector that staff them, to airlines, media companies and security firms.

This briefing focuses on one type of corporate actor – the sport sponsor. These companies build their image and increase profits by associating their brands with teams, competitions or sporting associations. This means that they share the responsibility for human rights impacts connected to their involvement with events and other opportunities.

These responsibilities are clear. Sponsorship agreements are no different from other business relationships. Through these agreements, sporting events become part of the company value chain, which means that, according to the United Nations Gui-

ding Principles for Business and Human Rights (UNGPs), companies should conduct what is called Human Rights Due Diligence (HRDD) to proactively assess actual and potential human rights risks – and act on these risks.

The purpose of this briefing is to provide concrete recommendations for sport sponsors on how to conduct rigorous HRDD throughout their entire value chain. It also calls on regulators to put in place binding due diligence rules that align with the UNGPs and encompass sport sponsorships.

Recommendations in brief

- Companies should conduct HRDD throughout their entire value chain, including their sport sponsorships, to map actual and potential human rights impacts. They should then address the findings, either directly or by exercising leverage on the sponsored actor.
- Companies should ensure that HRDD is conducted in consultation with affected stakeholders and credible civil society actors, such as human rights defenders, academics, unions and independent experts on human rights.
- Companies should ensure that workers and other rights holders have access to effective, accessible and transparent grievance mechanisms where they can raise complaints and through which human rights impacts can be remediated.
- Governments should introduce mandatory HRDD requirements that align with the UNGPs and cover all companies and the full value chain, including sport sponsorships.

For a full list of recommendations, see page 16.

FACT

Definition: Sport sponsorship

Corporate sponsorship is a marketing activity with the purpose of raising brand awareness and strengthening corporate image to increase sales and shareholder wealth.[4] In the world of sports, most of these sponsorships fall into one of four categories: individual sponsorship, team sponsorship, association sponsorship or event sponsorship.

The sponsored actor (team, association etc.) is sometimes referred to as the 'property'. Sponsors of the same property are called 'co-sponsors'. The sponsor paying the largest fees and receiving the largest set of benefits is usually referred to as the 'primary sponsor'.

Sponsorships can take many forms. Some companies offer cash in return for their sponsorships; others pay in kind by supplying goods or services – like air travel, mobile services etc. Another form of sponsorship is licensing, where a manufacturer pays for the rights to use the sports brand to produce items for sale. Other types of sponsors are media partners or equipment providers.

Background

Swedwatch has been working on the issue of sport sponsorship and human rights since 2014 and has published several reports and research briefings on the subject.[5] Swedwatch has also conducted dialogues on human rights with sponsors of several Swedish sports associations. Research conducted in 2018, in light of the FIFA World Cup in Russia, showed that many sponsors of the Swedish Football Association failed to conduct adequate HRDD or impose such requirements onto sponsored actors.

Although many of these corporate sponsors were aware of the human rights risks often connected to major sporting events, they either remained in the dark about their responsibilities or intentionally chose to ignore their duty to prevent or mitigate adverse impacts in line with international principles on responsible business conduct – most notably the UNGPs.

Globally, the value of sport sponsorship revenues was estimated at EUR 148 billion in 2016[6] – a number that is expected to increase significantly over the coming years.[7] For example, the international governing body of association football, FIFA, is expected to generate EUR 1.7 billion in marketing revenue from the World Cup in Qatar alone.[8] Unsurprisingly, FIFA refers to the World Cup as 'the most effective international marketing platform, reaching millions of people in over 200 countries throughout the world'.[9]

FACT

FIFA World Cup in Qatar

In November and December 2022, Qatar will host the FIFA World Cup. Qatar expects to welcome more than one million fans during an event that required the construction of seven new stadiums and 100 new hotels.[10] But Qatar is a controversial choice. In the run up to the event, the small nation has been in the spotlight regarding the human rights situation and the many labour rights abuses related to the preparations.[11] It is estimated that 30,000 migrant workers have been hired just to build the stadiums.[12]

The widely reported allegations concern the exploitation of these migrant workers, including forced labour and human trafficking, poor living and working conditions, the payment of illegal recruitment fees by workers, and delayed or unpaid wages (see testimonies included in this report). Workers in Qatar have also been denied access to their identity papers, which is indicative of forced labour, and in some cases they have been denied medical care.[13]

At the root of these issues lies the fact that Qatar's two million migrant workers – who make up 95 percent of the country's workforce – are administered through a system known as 'kafala'.[14]

According to kafala, every migrant worker needs a local sponsor, a so-called 'kafeel', who takes full responsibility for the worker. The system has been known to make it hard, if not impossible, to change employers – even when working conditions are difficult. Combined

with the practice of confiscating passports, kafala puts the worker in an extremely vulnerable position that risks crossing into forced labour. This makes it difficult for workers to enjoy many human rights, including freedom of movement and the freedom to address issues of occupational health and safety.

Following external pressure and international attention, Qatar has worked to reform kafala ahead of the World Cup. Although the system has been reformed to some extent, critics claim that these changes have made little difference to the practices of many employers or to workers' lives.[15]

Leading up to the World Cup, civil society organisations called for FIFA to provide remedy for abuses related to the preparations and hosting of the World Cup, and for sponsors to take an active role in this process.[16] A survey showed that a majority of surveyed fans supported the call to compensate migrant workers who have suffered as a result of Qatar hosting the World Cup.[17]

Sport sponsorships and human rights

According to the UN Guiding Principles of Business and Human Rights (UNGPs), all companies have a responsibility to respect human rights in their operations – a responsibility that extends to human rights impacts that a company is linked to through its business relationships.

In a sponsorship agreement, compensation is provided in return for marketing, advertising and/or promotional rights. When a corporate sponsor signs such a sponsorship agreement with a team, event or association, it enters into a relationship with significant economic potential for both sides.

The UNGPs set out the basic policies and processes that companies need to implement to respect human rights. While many sports associations and event organisers are not corporations as such, they do conduct commercial activities, making the UNGPs the appropriate standard for agreements between them and companies.[18]

The other main standard in this context is the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.[19] These guidelines are government-backed recommendations covering a wide range of issues including human rights and the environment. Together with the UNGPs, they are the main international instrument setting out what is considered responsible business conduct and good practice on these issues.[20]

According to both the UNGPs and the OECD Guidelines, a company should have a policy outlining its commitment to human rights.[21] In the context of sport sponsorships, it should be expected that the company has a human rights policy in place that covers its sport sponsorships and imposes similar requirements onto the sponsored actor. Some companies have already arrived at this point and so have many sponso-

red sports associations. One example is FIFA, which adopted its human rights policy in 2017. However, sponsors cannot settle for policies alone. A responsible company must move beyond policy to conduct HRDD and address concrete human rights impacts that they are linked to.

TESTIMONIES FROM QATAR:
Mohammad from Bangladesh

Many migrant workers seek employment in Qatar to support their families and escape unemployment in their home countries. But migrating for work comes at a high cost. Mohammad from Bangladesh migrated to Qatar for work in 2015. His family used their personal savings, sold some of their land and took out loans to cover the EUR 7000 recruitment cost. When he arrived in Qatar though, the recruitment agent did not provide Mohammad with a job. He had to find a job by himself.

'I did not have enough money for food or accommodation, so I had to take more loans from other workers. When I finally found a job, my employer did not give me my salary for three months. Then I had to borrow even more money.'

Mohammad returned to Bangladesh in 2020. He could only pay back half of the loan his family took out for him during the four and a half years he spent in Qatar.[22]

Human Rights Due Diligence (HRDD) and stakeholder involvement

Under the UNGPs, companies have a responsibility to assess the actual and potential human rights impacts, integrate and act upon the findings, track responses and communicate how the impacts are addressed.

Analysing all the actual and potential human rights implications of a large sporting event is a complex undertaking with a wide range of companies and public actors involved during the preparation and completion stage. This could lead to gaps in responsibilities to prevent human rights impacts and further delays in providing affected individuals and communities with access to justice and effective remedy.[23]

The UNGPs therefore recommend that companies draw on independent expert advice on how to act.[24] Meaningful HRDD should be based on consultations with rights holders, human rights defenders, trade unions and other civil society actors.

This type of stakeholder engagement forms the basis for assessing and deciding first, what the risks are and where action is most urgent; and second, how to address these risks and impacts effectively on the ground.[25] Conducting HRDD in this manner ensures that the knowledge and experience of potentially affected groups and other relevant stakeholders, particularly those in vulnerable positions such as women, are informing all stages of the process.[26]

Currently many companies are not engaging with rights holders in this way, and those that are often use forms of engagement that are not leading to concrete results.[27] However, when consultation is done properly, they bring in qualitative rights holder perspectives to the HRDD process. Indeed, rights holders have insights that are needed to close accountability gaps and confront threats. Not consulting them would imply that a company is not serious about managing human rights risks.[28]

FACT

From voluntary to mandatory due diligence

More than ten years after their inception, the UNGPs have clearly not yielded the desired results. Too many companies today either remain unaware of their human rights obligations or take advantage of the voluntary nature of existing frameworks on responsible business conduct. Several studies have proven that companies are by and large not held accountable for human rights and environmental violations.[29]

Some sponsoring entities have taken laudable steps to align their business activities with the UNGPs. Many others are still lagging behind. To ensure all companies that sponsor sport events are consistently playing their part in preventing cases of corporate abuse, governments must level the playing field by regulating effective due diligence obligations. Without hard laws, implementation efforts among sponsors will remain scattered and might put those willing to lead by example at a competitive disadvantage.

In February 2022, the European Commission took an important step in this direction by proposing its Corporate Sustainability Due Diligence Directive (CSDDD). This proposal aims to make it mandatory for both European Union (EU) and non-EU companies operating in the union to conduct HRDD on a systematic basis. It is imperative that the CSDDD and any future regulations intended to make HRDD mandatory align with the UNGPs, apply to all companies and cover the full value chain, including sport sponsorships.

The bidding process

It is the responsibility of the sporting association to account for human rights when selecting a hosting country or city. However, this responsibility extends to the corporate sponsors, which must be aware of how the event will impact human rights. This includes knowing what the vulnerable groups are, what commitments have been made regarding stakeholder engagement, and what mechanisms are in place to provide grievance processes for those who have been adversely impacted.[30]

When conducting HRDD for sport sponsorships activities, companies must take into consideration that human rights impacts can occur at any stage of the event life cycle. Therefore, it is essential that HRDD is ongoing – before, during and even after the event takes place.

One of the most important moments to address human rights issues is in the event bidding phase and early planning stages. For a sponsor, the bidding and selection

phase is an opportunity to demand that the sponsored actor uses social and environmental criteria when deciding on the host.

This could be done through bidding requirements that require the actors involved to conduct HRDD based on internationally recognised principles and standards.[31] Once a host country has been selected, the sponsored sports body should be required to conduct a human rights impact assessment for the event.

Some sporting organisations are already taking steps in this direction. In 2017, FIFA, following the adoption of its new human rights policy, introduced new bidding requirements for the World Cup, explicitly mentioning human rights.[32] According to FIFA, a hosting country must formally commit 'guarantees of compliance with international human rights and labour standards from the government and host cities as well as from entities responsible for the construction and renovation of stadiums, training sites, hotels and airports'.[33]

The first bidding process to use these new criteria was for the 2026 FIFA World Cup. Eventually Canada, Mexico and the United States were awarded the event. As part of the bidding process, every hosting city in the three nations drew up strategies that were said to be based on meaningful consultation with human rights stakeholders.[34] It remains to be seen whether these policies will be honoured and materialise into concrete changes on the ground.

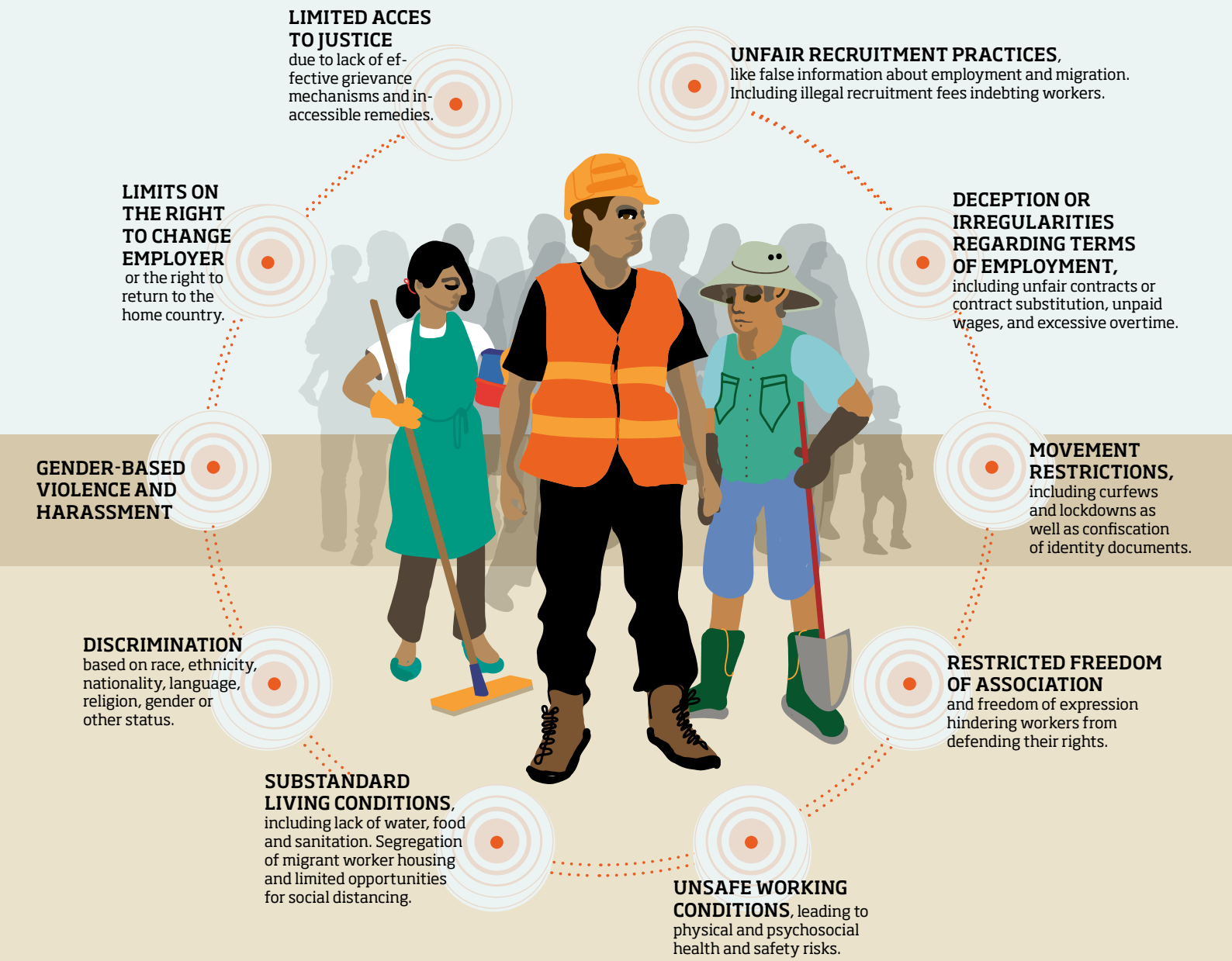
TESTIMONIES FROM QATAR:
Mominul from Bangladesh

When Mominul migrated to Qatar he was just 16 years old. A recruitment agent convinced his father to lie about Mominul's age and charged EUR 4,600 for the recruitment process. In the contract Mominul signed, he was promised EUR 250 per month plus overtime.

'I worked 10–11-hour days. I only received EUR 190 per month in wages and no overtime. After 11 months, the company took my ID and bought me a return ticket. I did not want to go home so I ran away and hid in the jungle nearby. I found another job there, but they did not pay me regularly. When the police caught me, I had no work permit, so I was sent home.'

Mominul's family was only able to repay one third of his recruitment costs with his earnings from Qatar. His father subsequently sold a piece of land to repay the mortgage on the loan that the family took for Mominul. They still have not repaid all their loans.[35]

Human rights impacts in the migration cycle



Leverage

A major question for a corporate sponsor, of course, is how to ensure that it has sufficient influence over matters related to human rights. According to the UNGP terminology, sport sponsors are, in most cases, directly linked to the impacts on the ground – rather than causing or contributing to them. This means that they must seek to prevent or mitigate these impacts.[36]

Sponsors that want to act on their responsibilities do so by putting pressure on the sponsored team or association.[37] How to apply this pressure is dependent on how much leverage the company has over the sponsored actor. Leverage is determined by a number of factors, including how crucial the relationship is to the actors, the severity of the abuse and whether terminating the relationship with the actor itself would have adverse human rights consequences.[38]

FACT

Filing a complaint against FIFA

In May 2015, the global union federation Building and Woodworkers International (BWI) filed a complaint arguing that FIFA – as a multinational actor engaged in commercial activity – was covered by the OECD Guidelines for Multinational Enterprises. The case was filed with the OECD National Contact Point in Switzerland, which accepted the case and later agreed to mediate a mutually acceptable outcome.[39]

In March 2017, the outcome resulted in FIFA accepting its responsibility to push for decent and safe working conditions for the construction workers building stadiums and sports facilities for the World Cup. FIFA developed a human rights policy and committed to seeking ways to honour the principles and standards stated in the OECD Guidelines, and to strengthen due diligence processes for future bidders for the FIFA World Cup.[40]

However, recent research concerning FIFA's due diligence practices in Qatar suggests that the organisation still has a long way to go to fulfill expectations.[41]

If the sponsor lacks sufficient leverage, it should look for ways to increase it – for example, by collaborating with other sponsors.[42] In cases where the sponsor lacks leverage and is unable to increase it, the company may consider ending the relationship, taking into account credible assessments of potential adverse human rights impacts of doing so.[43]

For sponsors, a way to fill these gaps is by including contractual obligations on human rights in agreements between sports associations and host countries along with other requirements and evaluation criteria. This would mean that hosts that do not respect human rights are in breach of contract.[44] However, contractual provisions do not excuse the sponsors from their own HRDD obligations and cannot be used to outsource human rights responsibilities to others.

TESTIMONIES FROM QATAR:
Samad from Bangladesh

Samad, 26, was recruited informally to Qatar and upon arrival did not receive a work permit. He started working illegally at different construction sites in Doha. After one year he found a job in a coffee shop.

'I worked in the coffee shop for nine months and lived in a small room behind the shop together with two other workers. The owner of the shop used to threaten me and the other workers and say he would call the police if we did not do as he said. When I asked for my wages, the owner said I could no longer work there. I only received salary for four months of work.'

Samad's family is still in debt after borrowing money to cover his recruitment costs (EUR 5,450).[45]

Remedy

Access to remedy is a key pillar of the UNGPs. A person whose human rights have been impacted by the activities of a business enterprise has the right to remedy. Companies that have caused or contributed to these impacts have a responsibility to provide or cooperate in this remediation.[46]

Companies that have neither caused nor contributed to the impacts but are directly linked to them through a business relationship – for instance, through a sponsorship agreement – are not required to provide remedy, although they may play a role in doing so.[47]

In this context it is worth mentioning that, in a note from the office of the United Nations High Commissioner regarding the responsibility of the banking sector, the High Commissioner argues that there is a continuum between having a direct link and contributing to an adverse human rights impact. A company that is made aware of an ongoing human rights issue that it is directly linked to may be considered to be facilitating the continuance of violations and thus be contributing – instead of being linked – to the adverse impacts. This would in turn have implications regarding the responsibility to provide remedy for those affected.[48]

Remedy may take many forms including apologies, restitution, rehabilitation, financial or non-financial compensation and punitive sanctions as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.[49]

A core component of this work is the establishment of a grievance mechanism where those impacted can raise concerns. Once a grievance has been identified, the mechanism can be used to remediate the impact, preferably early and directly, to prevent harms from escalating.[50]

Although there are state-based judicial and non-judicial, as well as operational-level mechanisms, that can be relevant in addressing human rights impacts related to sporting events, there are still considerable gaps regarding access to remedy in this context.[51] According to the Mega-Sporting Events Platform for Human Rights, the access to remedy is still very unclear for the many impacts on human rights that a major sporting event might have.[52]

One reason for the lack of remedy is that there are so many actors involved in the organisation of a major sporting event and that the responsibilities of these different actors can be hard to ascertain. This means that those impacted often face the challenging task of having to identify the responsible actor and accessing the appropriate grievance mechanism if there is indeed such a mechanism in place.[53]

Moving forward, organisers and corporate actors connected to the event, such as sport sponsors, would have to make sure rights holders have access to suitable grievance mechanisms and remedy. In those cases where other actors fail, a corporate sponsor should consider setting up its own grievance mechanism tailored to rights holders' needs.

TESTIMONIES FROM QATAR:
Khalid from Bangladesh

Khalid experienced what is often known as 'debt bondage', meaning that migrant workers pay for recruitment and travel, which means they are already heavily indebted to their employer and/or recruiter when they arrive. This situation is made worse if workers do not receive their wages.

After Khalid's first employer in Qatar shut down its operations and was acquired by another company, Khalid's family had to take additional loans to pay EUR 2,900 so that he could continue working. But the new company did not pay the workers.

'I worked for several months without any pay. Some days all I had to eat was a piece of bread and some water. I had to start bringing money from Bangladesh to pay for food and accommodation. My family had to sell more land to pay for me to survive in Qatar. My family is still in debt repaying the costs of my migration.'

Since his return to Bangladesh, Khalid is yet to find a new job.[54]

Conclusion

Sport sponsors build their images and sell their products by associating their brands with national and international sporting associations, teams or sporting events. But entering into an agreement that makes a specific sporting event part of the company value chain comes with a responsibility – to address the human rights risks and impacts arising from the event.

What this responsibility entails is clear. Since sponsors profit from their connection with the event, they should work to ensure that human rights are central throughout the event life cycle, from the initial bidding process through preparation, delivery and lasting effects of the event.

Sponsorship agreements are no different from other business relationships, which means that companies must conduct HRDD to proactively assess actual and potential human rights risks – and act on these risks. It also means that they should not be exempt from regulatory scrutiny and liability.

While some companies have the proper policies and other instruments in place, this is only a starting point. Work in this area must go beyond policy and address human rights issues in a manner that is based on consultations with rights holders and leads to concrete change.

An important component of this work is remediation. Since a sporting event has the potential to impact human rights in so many ways, all actors involved should ensure that those impacted have access to effective remedy.

However, much of the harm done could have been avoided through preventative measures. To avoid future sporting events being held at the expense of rights holders, all actors must ensure that respect for human rights plays a key role in preparation for and implementation of these events. Corporate sponsors are essential stakeholders in realising this vision.

Sponsors that are not addressing these issues are falling short in their efforts to respect human rights. To move forward and ensure that sport sponsorships are not infringing on people's human rights around the globe, sponsors must learn from efforts in other sectors and draw upon the expertise of civil society actors such as trade unions, human rights defenders and others.

Full list of recommendations

Companies that sponsor sports organisations should:

- Adopt a human rights policy that covers sport sponsorship activities and conduct thorough HRDD for their sport sponsorships.
- Demand that social and environmental criteria are used in the bidding process for any sports event that the sponsor is connected to. Once a host has been selected, the sponsored actor should be required to conduct a human rights impact assessment for the event.

When conducting HRDD for its sport sponsorships, companies should:

- Ensure that this process is conducted in a way that is gender sensitive and includes mapping and analysis of actual and potential human rights impacts the company may cause, contribute to or be directly linked to through its sponsorship relationships.
- Act on the findings of this mapping, either directly or by using its leverage to make the sponsored actor to take action on the issues – for example, by raising the identified impacts with its international counterparts (like the host country or the organising committee of an event).
- Seek to increase its leverage, if the company has insufficient influence over the sponsored actor – for example, by cooperating with other sponsors.
- Consult on these issues with affected stakeholders and credible civil society actors, such as human rights defenders, academics, unions and independent experts.
- Pay particular attention to people in vulnerable positions, including migrant workers. HRDD should ensure that all costs of migrant workers lie with the employer and enable migrant workers to freely change employers without unnecessary delays or special permissions.
- Ensure that the sponsor, as a last resort, has the contractual ability to be released from its sponsorship agreement if issues related to human rights are not addressed in a satisfactory manner by the sponsored actor.
- Ensure that relevant policies as well as activities and results of the HRDD process are made public and communicated in accordance with the concept of 'know and show', as outlined in the UNGPs.

Companies that sponsor sports organisations should require that the sponsored actor:

- Has a human rights policy that is publicly available and implemented in a way that guarantees participation by rights holders and/or their representatives.

- Has procedures in place for conducting proper HRDD throughout its entire value chain. This process should be based on consultation with stakeholders, such as dialogue with rights holders or their representatives and on-location inspections.
- Establishes clear communication channels for corporate sponsors to raise human rights concerns. The sponsored actor must also have an obligation to follow up on such concerns – for example, with the host country or the organisation behind an event.
- Puts in place an effective, accessible and transparent grievance mechanism where workers and other rights holders can raise complaints and seek remediation for adverse impacts.
- Openly communicates relevant human rights policies, as well as activities and results of the HRDD in accordance with the concept of 'know and show', as outlined in the UNGPs.

Legislators regulating responsible business conduct should:

- Introduce mandatory HRDD requirements that align with the UNGPs and cover all companies, regardless of size and sector, as well as the entire value chain and all types of business relationships – including sponsorship agreements.

Endnotes

1 Mega-Sporting Events Platform for Human Rights. (2017) 'Remedy Mechanisms for Human Rights in the Sports Context – Sporting Chance White Paper'.

2 OECD. (2016) 'Organising Sporting Events – Preventing corruption and promoting responsible business conduct'.

3 Pattisson, P., McIntyre, N. (2021) 'Revealed: 6,500 migrant workers have died in Qatar since World Cup awarded', The Guardian, 23 February 2021.

4 Olayiwola Bello, O. (2016) 'Sponsorship in Sports: Types, Classification and Importance to Sports Organizations'.

5 See for example, Björnsson, O. (2018) 'The 2018 FIFA World Cup in Russia: Sponsorship and human rights'. Sommerfeld, I. (2014) 'Mänskliga rättigheter på hal is - Svenska ishockeyförbundet och dess sponsorer passiva inför Lukasjenkas VM-show'. Jennische, E. (2014) 'De olympiska kränkningarna - Om OS i Sotji, de svenska sponsorerna och de mänskliga rättigheterna'.

6 Transparency International. (2016) 'Global Corruption Report: Sport'.

7 Globe Newswire. (2022) 'The Global Sports Sponsorship Market is expected to grow by $ 44.99 bn during 2022-2026, accelerating at a CAGR of 18.55% during the forecast period'. https://www.globenewswire.com/news-release/2022/09/12/2514339/0/en/The-Global-Sports-Sponsorship-Market-is-expected-to-grow-by-44-99-bn-during-2022-2026-accelerating-at-a-CAGR-of-18-55-during-the-forecast-period.html (Accessed: 23 October 2022).

8 HRW, Amnesty and FairSquare. (2022) 'Letters to FIFA 2022 World Cup Partners and Sponsors'.

9 FIFA Museum. 'FIFA partners'. https://www.fifamuseum.com/en/about-the-museum/partners/ (Accessed: 23 October 2022).

10 Sustainable Hospitality Alliance. (2019) 'Labour Rights in the Hospitality Sector in Qatar: A Moment of Opportunity'. https://sustainablehospitalityalliance.org/labour-rights-in-the-hospitality-sector-in-qatar-a-moment-of-opportunity-2/ (Accessed: 23 October 2022).

11 BBC. 'World Cup 2022: How has Qatar treated foreign workers?' https://www.bbc.com/news/world-60867042 (Accessed: 23 October 2022).

12 Ibid.

13 Centre for Sport and Human Rights. (2021) 'Labour Rights in Qatar: Due Diligence Starter Kit'.

14 Zayadin, H. Human Rights Watch. (2021) 'Migrant Workers and the Qatar World Cup'. https://www.hrw.org/news/2021/08/02/migrant-workers-and-qatar-world-cup (Accessed: 23 October 2022).

15 Building and Wood Workers' International. (2021) 'Dribble or Goal? Tracking the Score for Decent Work Legacy in Qatar'.

16 HRW, Amnesty, and FairSquare. (2022) 'Letters to FIFA 2022 World Cup Partners and Sponsors'.

17 Business and Human Rights Resource Centre. (2022) 'Qatar 2022: Amnesty International poll shows 73% of surveyed fans in favour of FIFA compensation to migrant workers; incl. comments from FIFA'. https://www.business-humanrights.org/en/latest-news/qatar-2022-amnesty-international-poll-shows-73-of-surveyed-adults-in-favour-of-fifa-compensation-of-migrant-workers-incl-comments-from-fifa/ (Accessed: 23 October 2022).

18 Ruggie, J. (2016) 'For the game. For the World – FIFA and Human Rights'. Harvard Kennedy School.

19 OECD. (2011) 'Guidelines for Multinational Enterprises'.

20 OECD. (2016) 'Organising Sporting Events – Preventing corruption and promoting responsible business conduct'.

21 UNGP 15a and OECD Guideline IV 4.

22 Interview conducted by Swedwatch, 2 March 2022.

23 Heerdt, D. Næss, H. E. (2021) 'Large Sporting Events: Human Rights as a Game Changer?'

24 UNGP 19 (Commentary).

25 Business & Human Rights Resource Centre, Front Line Defenders, Indigenous Peoples Rights International, ProDESC. (2021) 'Hearing the human – Ensuring due diligence legislation effectively amplifies the voices of those affected by irresponsible business'.

26 Ibid.

27 Ibid.

28 Mullen, M. (2020) 'Why rightsholder consultation is the gateway to effective human rights due diligence'. https://www.business-humanrights.org/en/blog/why-rightsholder-consultation-is-the-gateway-to-effective-human-rights-due-diligence/ (Accessed: 23 October 2022).

29 European Commission. (2020) 'Study on due diligence requirements through the supply chain'.

30 Mega-Sporting Events Platform for Human Rights. (2018) 'Sport, Sponsorship and Human Rights: Guiding Questions'.

31 OECD, 2016, 'Organising Sporting Events – Preventing corruption and promoting responsible business conduct'.

32 Heerdt, D. (2018) 'Tapping the potential of human rights provisions in mega-sporting events' bidding and hosting agreements'.

33 FIFA. 'Guide to the bidding process for the 2026 FIFA World Cup'.

34 Clifford Chance, Centre for Sport and Human Rights. (2022). 'The promise of a positive legacy – The 2026 FIFA World Cup host city candidates' human rights plans'.

35 Interview conducted by Swedwatch, 8 March 2022.

36 UNGP 13 (b).

37 Archer, I. 'Qatar World Cup 2022: Football associations failing to engage with human rights risks of the tournament'. https://www.business-humanrights.org/en/blog/qatar-world-cup-2022-football-associations-failing-to-engage-with-human-rights-risks-of-the-tournament/ (Accessed: 23 October 2022).

38 UNGP 19 (Commentary).

39 Building and Wood Workers' International. (2021) 'Dribble or Goal? Tracking the Score for Decent Work Legacy in Qatar'.

40 Ibid.

41 Based on investigations between September 2020 and October 2022, a 2022 report by human rights and labour rights charity Equidem found that inspection processes by FIFA were inadequate to protect migrant workers from abuse. See: Equidem. (2022) 'If we complain, we are fired - Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites'.

42 UNGP 19 (Commentary).

43 UNGP 19 (Commentary).

44 Heerdt, D. Næss, H. E. (2021) 'Large Sporting Events: Human Rights as a Game Changer?'

45 Interview conducted by Swedwatch, 9 March 2022.

46 UNGP 22.

47 UNGP 22.

48 OHCHR. (2017) 'Response to Request from BankTrack for Advice Regarding the Application of the UN Guiding Principles on Business and Human Rights in the Context of the Banking Sector'.

49 UNGP 25.

50 UNGP 29.

51 Centre for Sport and Human Rights. (2018) 'Mapping Accountability and Remedy Mechanisms for Sports-Related Human Rights Grievances – Background paper for Strategic Dialogue on Remedy'.

52 Mega-Sporting Events Platform for Human Rights. (2017). 'Remedy Mechanisms for Human Rights in the Sports Context – Sporting Chance White Paper'.

53 Heerdt, D. (2018) 'Tapping the potential of human rights provisions in mega-sporting events' bidding and hosting agreements'.

54 Interview conducted by Swedwatch, 7 March 2022.

55 Interview conducted by Swedwatch, 2 March 2022.