

Communication on Engagement (COE)

The Football Association of Norway (NFF)

Period covered by this COE: June 2021 – June 2023 (*deadline 21st June 2023*)



I. Statement of Continued Support by the President of NFF, May 2023

To our stakeholders: I am delighted to confirm that Norwegian football, under the auspices of the Football Association of Norway (NFF), reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents. In this Communication of Engagement, we describe the actions that our organisation has taken to support the UN Global Compact and its Principles. We also pledge to share this information with our stakeholders using our primary channels of communication.

Since our organisation became a UN Global Compact member two years ago, I am proud to say that Norwegian football has come a long way in its commitment and practical efforts to strengthen and promote respect for human rights, labour rights, the environment and anti-corruption both in Norway and in international football. These efforts have gradually become formally adopted and embedded into our own organisation's statutes, as well as those of broader sporting bodies, to ensure long-term obligations. Sustainability, of course, requires real action alongside formalised commitments on paper. This implementation phase of NFF's support of the UN Global Compact and its Principles will play a particularly important role in the upcoming period of engagement. I look forward to joining my colleagues in this crucial time, together building a stronger and more sustainable future for our sport and our society.

Yours sincerely,

Lise Klaveness

President of the Football Association of Norway (NFF)



II. Description of Actions

Human Rights & Labour Rights

NFF's work to promote and strengthen human rights gained particular traction in response to the debate surrounding the FIFA Men's World Cup in Qatar in 2022 (see part IV). The debate was especially prominent in Norway, contributing strongly to the association's commitment to put topics such as human rights, labour rights, sustainability, and good governance on the football agenda, both at home and internationally. In the reporting period 2021-2023 NFF has adopted its own [Human Rights Policy for Norwegian Football](#) as well as an [International Strategy](#) including key performance indicators related to the UN Global Compact Ten Principles. These live documents serve as a result of multiple initiatives taken by NFF in the reporting period, as well as the formalised first stages of a continued portfolio of work by the Norwegian association to integrate human rights into our sport.

During the same period NFF has also advocated for continuous and systematic due diligence routines throughout Norwegian football. A tool being developed for this purpose is NFF's **Due Diligence Handbook**, which is designed to help football clubs around the country practice sound due diligence, in connection to sponsorship agreements, training camps and matches abroad as well as everyday decisions that affect rights holders. The handbook guidelines are based on established practice described in documents such as the UN Guiding Principles and OECD Due Diligence Guidance for Responsible Business Conduct.

NFF also has due diligence commitments tied to the recent [Norwegian Transparency Act](#) passed last year, relating to enterprises' transparency and work on fundamental human rights and decent working conditions. The Act places a mandatory duty on Norwegian enterprises of a certain size, to conduct human rights due diligence and fulfil transparency obligations. To aid the association in this process, two employees from NFF's International Social Responsibility department attended [UN Global Compact Norway's 3-day induction course](#) on the new Act and due diligence methodology. NFF will submit its first report in June 2023.

Another skills development initiative NFF has undergone in the current reporting period is participation in [Asser Institute's Summer Programme in Sport and Human Rights](#) in September 2022. The course involved interaction with key stakeholders in the international football and sports communities and contributed to developing NFF's knowledge on the intersection of sport and human rights. See [here](#) for a summary of NFF's course experience.

Much of NFF's engagement with human and labour rights since 2021 has involved collaborative efforts and building a strong community committed to human rights within the football ecosystem, both in Norway and internationally. This both to build on each other's competency areas and to implement long-term and sustainable projects. Cooperation with human rights organisations such as Amnesty International and global trade unions has been an important part of NFF's human rights work. One key platform has been NFF's membership in the [UEFA Working Group on Human and Labour Rights](#), which has conducted four site visits to Qatar in the reporting period and worked on three prioritised topics related to the 2022 World Cup (LGBTQI+ rights, a resource centre for migrant workers in Qatar and a remedy fund tied to tournament preparations). These collaborative efforts culminated in an important focus on human and labour rights at the FIFA Congress in Kigali, during which NFF submitted a proposal to mandate an evaluation of FIFA's implementation of its Human Rights Policy, with particular emphasis on remedy. The proposal received broad support and several important commitments from FIFA that will form key parts of NFF's continued work with human and labour rights in the coming reporting period.



Environment & Anti-Corruption

NFF and its members have worked on several environmental initiatives over the last two years and have this portfolio of work high on its agenda in the upcoming period. Several of NFF's initiatives are detailed on [NFF's sustainability pages](#). Internationally, NFF became the UN's first pilot nation in the newly launched [Football for the Goals](#) project, aimed at providing the global football community a platform to engage with and advocate for the Sustainable Development Goals (SDGs). In addition, environmental sustainability played an important role in the joint Nordic bid to host the UEFA Women's Euro in 2025. Despite a losing bid, the application process instigated productive dialogue with local stakeholders working with sports and environmental sustainability and provided valuable learning that NFF will develop further, especially in relation to ensuring environmentally conscious football events, infrastructure, and activity in the future. The process also strengthened concrete cooperation between the Nordic football associations, with environmental sustainability as a central focus.

NFF has in this reporting period developed a new **Sustainability Strategy for Norwegian football** currently in the final drafting stages. The strategy is guided by [UEFA's Sustainability Strategy](#) for European football and encompasses all of the UNGC's ten principles, also environmental, through categories such as 'greener' routines in Norwegian football clubs and more sustainable football infrastructure. The contents of the strategy also encompass other categories related to the UNGC ten principles, such as responsibility and human rights, however, efforts to make football more environmentally sustainable are emphasised particularly as it is widely acknowledged that this is an area that sports has the most potential to reduce and mitigate negative harm and drive positive impact. Learning and skills development has also played an important role in NFF's development of its sustainability strategy, with two key learning paths worth mentioning. Firstly, the participation of several of NFF's employees in the [Norwegian School of Sport Science's course in Sports and Sustainability](#), as well as NFF's participation in UNGC's [SDG Ambition Accelerator Programme](#). NFF's participation in the latter 6-month course resulted in a strategy to strengthen resource recovery of football textiles in the Norwegian context.

Another key area of NFF's sustainability strategy is the topic of anti-corruption. The strategy outlines NFF's plans to develop an anti-corruption policy, relevant both nationally and internationally, and to continue advocating for anti-corruption practice in international football, especially with regard to bidding processes and awarding large football tournaments/events. This issue played an important role in NFF's work with human and labour rights mentioned above and is described in more detail in NFF's reports on its engagement with the Qatar Men's World Cup in 2022.



III. Measurement of Outcomes

In June 2021 NFF organised an [Extraordinary General Assembly](#) for its members to vote over a potential boycott of the 2022 Men's World Cup, on the basis of poor human rights and labour rights conditions for migrant workers in the host country. Prior to the Assembly, NFF mandated the so-called [Norwegian Qatar Commission](#) to assess what effects a boycott or alternative action would have on rights holders in the host nation, Qatar. The extraordinary general assembly resulted in a 'no'-vote to boycott, and NFF's adoption of 26 key action points based on the Qatar Commission's recommendations, designed to strengthen respect for human rights in Qatar, as well as international and Norwegian football. Measurement of outcomes related to the topics this report covers can be found in [NFF's status reports](#) on the 26 action points in addition to [NFF's final report](#) on its Qatar and human rights related work. An evaluation of this work and NFF's overall efforts to implement the 26 initiatives, can be found in the [Ethics Committee's final evaluation report](#) (page 210).

The following passages are taken from NFF's Human Rights chapter in its Annual Report for 2022, which can be read in its entirety [here](#).

NFF Annual Report 2022: Human Rights

For several years, concern has been expressed about the conditions of guest workers in the host country for the men's World Cup in Qatar. In the spring of 2021, the whole of football Norway engaged in a debate about a possible Norwegian boycott and how football should strengthen its international social responsibility. On June 20th, the extraordinary general assembly decided against a boycott of the men's World Cup in 2022, but rather to support the Qatar Commission's 26 measures to combat sports washing and strengthen respect for human rights in Qatar in addition to Norwegian and international football.

Since the extraordinary assembly, NFF has worked on following up the 26 measures. The day-to-day operational responsibility was placed in NFF's department for international social responsibility, which has over 20 years of experience with international cooperation through development projects in the Middle East, North Africa, South-East Asia, and the Balkans.

Strengthened voice internationally

At the extraordinary assembly, it was also decided that NFF must criticise FIFA from the FIFA Congress stage, for awarding the championship to Qatar and for not having done enough to influence the conditions for human rights.

In March 2022, the NFF's new football president, Lise Klaveness, took to the podium at the FIFA Congress in Doha to criticise FIFA for an unacceptable award of the World Cup to Qatar, with unacceptable consequences. On behalf of all Norwegian football, the football president also demanded more transparency in FIFA as well as a more responsible management of international football based on democratic principles.

The involvement of supporters and Norwegian clubs in the boycott discussion, the knowledge gathered by the Qatar Commission, the efforts of NFF's member democracy, Norway's national team demonstrations and Klaveness' speech are all among the contributions that have



since 2021 given NFF credibility and strength in international discussions on football and human rights. A result of NFF's follow-up of the 26 measures is a strengthened voice internationally.

- Now it is time to take things further. Take on the pressure, dare to take action. For all the girls who are not allowed in where dreams are made, for the boys and girls who have to hide who they are, for Bhogendra from Nepal who came to Qatar to provide for his family but died on the job in 2018 and for all other workers who have lost their life or been injured in the service of football, said football president Lise Klaveness when she received the Free Speech Award for her speech at the FIFA Congress in Qatar in March 2022.

Cooperation and alliance building

NFF has worked for change in Qatar and in FIFA through dialogue and participation. Building knowledge and cooperation between Norwegian and international football now takes place in a completely different way than before. Through follow-up of the 26 measures with the dialogue approach, NFF has built up a broad network of contacts with actors from both football and the human rights field. Among other things, the NFF has had a direct dialogue with the first openly gay Qatari, Nasser Mohamed, about the situation for LGBTQI+ people in the Gulf region and spoken directly to the Council of Europe's Parliamentary Assembly in Strasbourg about good governance in sports and the protection of workers' rights in Qatar. Norwegian football has also strengthened its cooperation with the Norwegian authorities and, not least, with other football associations.

UEFA's Working Group on Human and Labour Rights, which has coordinated the European countries' efforts towards Qatar, has been an important channel for the NFF to promote dialogue with demands. The UEFA group gave early support to several of the 26 measures adopted by NFF and has had a particular focus on three prioritised tasks: establishment of a resource centre for migrant workers in Qatar, establishment of a compensation fund for human rights violations related to the Qatar World Cup and LGBTQI+ rights in Qatar.

The UEFA group visited Qatar once in 2022 in addition to general meetings in Doha just ahead of the World Cup kick-off date on November 20th. The group's three priority issues were raised and discussed with, among others, FIFA, the host country's labour and foreign ministries, the Supreme Committee and the Qatar Football Association. The UEFA group has also had digital meetings throughout the year with, among others, the International Construction Workers' Union (BWI) and Amnesty International.

Important lessons learned from the work with the 26 measures

Several important lessons have come out of NFF's work on the Qatar Commission's measures. The Qatar case has helped to make clear that football's power and influence also makes it vulnerable to exploitation, non-sporting interests and a weakened value base. Combating sports washing and protecting the values that Norwegian football stands for are important parts of football's international social responsibility.

The new challenges are also happening in a world that is experiencing increasing polarisation and unrest - inside and outside of football. It is no longer possible for football to live in a bubble. In 2022, we saw that non-sporting conditions such as war in Europe, climate change and labour conditions in Qatar can affect what happens on the football pitch. This insight clarifies a need in football for more dialogue and cooperation, across cultural and perhaps sometimes value-based dividing lines.



With the new trends and challenges in football also comes a responsibility. Society has greater expectations of football's conduct; some even make it into law. In 2022, the NFF has learned that human rights are an integral part of our core business - developing the game of football itself.

This applies just as much on the international arena. In 2022, the NFF has clearly stated that FIFA, as the international football association, must exercise its function – both its sporting and the value-based functions – in a responsible and trustworthy manner.

- Football is a global sport, and that requires FIFA to be very aware of its role in an increasingly polarised world. Major events such as the World Cup are awarded to countries where it is extremely difficult to raise the standards of human and labour rights up to an internationally recognised level. We need a FIFA that takes the lead and gathers the confederations around minimum ethical standards, governance, and clean bidding processes, says football president Lise Klaveness.

The future of football and human rights

The continuation of Norwegian football's work with human rights will aim to rebuild trust in international football, introduce good due diligence routines in Norwegian football and actively contribute to cooperation on a fair and sustainable future for football. This will require a simultaneous focus on both the Norwegian and the international contexts.

Although the way forward is based on the fact that human rights are an integral part of football, it is important to emphasise the importance also of sporting achievements.

- That our flagships represented by the national team for A women and A men perform well, and that our club teams qualify and perform in the Champions League (preferably) will mean that our voice will be heard to an even greater extent, says general secretary, Karl-Petter Løken.

Collaboration is the key. It has been important in dealing with all the complex issues that human rights work presents, as there is always something to learn from others. With NFF's expanded network, it will be easier for NFF to base its human rights efforts on Norwegian foreign policy and guidance from human rights experts, thus making room for sporting priorities without compromising football's respect for human rights. The role for Norwegian football, on and off the pitch, will be based on our values: **Safe - Inclusive - Courageous.**