

Good governance at FIFA: a factual account

Introduction

FIFA is the subject of a report on "*Good football governance*", written by Anne Brasseur, a member of the Committee on Culture, Science, Education and Media of the Parliamentary Assembly of the Council of Europe (CoE). A provisional version of this report was made public in December 2017 — something rather surprising, considering that the report has not been taken to the members of the Parliamentary Assembly, who will not discuss until later this month.

It is important to note that FIFA and the Council of Europe have recently agreed to [establish a partnership](#) on how to better promote human rights in sports. The two organisations will start working on a Memorandum of Understanding, which should set out in detail the areas of cooperation. The aim is to have the Memorandum of Understanding ready for signature by the end of 2018.

Football, as the report itself highlights, is a global mass phenomenon. To the extent that it prompts the interest of political entities like the CoE to engage resources for numerous publications on the topic of international football governance. This is the fourth report in the past five years on the same topic from the same committee and a fifth report is in the pipeline.

The FIFA administration is open to discuss and ready to accept constructive criticism from all parties, even from those whose image has been tarnished through serious corruption cases. However, criticism has to be evidence based.

There is information in "*Good football governance*" that is either incomplete, missing or downright wrong. With this document, we present facts that either complete or correct such parts of the report.

A significant number of references to FIFA are supported not by evidence but by assumptions. FIFA believes that subjective sentences beginning with "it appears to me" or "I believe that" do not belong in an equitable account of governance in football by an international political entity – particularly not when used as the means to state assertive conclusions a few paragraphs ahead.

The world governing body of football has undergone a governance overhaul, the foundations for which were laid by the approval of its reformed Statutes in 2016 and their subsequent implementation. It is a continuous process that FIFA is seriously engaged in, and in these pages are key concrete facts that testify to this.

Governance structure

a) Separation of powers

The draft report states in part B, chapter 2.1, point 20 inter alia that “the control of the President over all FIFA activities, including over management functions seems to be as strong as under the previous leadership.”

This is a groundless allegation based on personal assumptions alone, and not on facts. More importantly, it is categorically wrong. The facts are as follows below.

Gianni Infantino was elected FIFA President in February 2016, at the same Extraordinary Congress in which the reformed [FIFA Statutes](#) were approved. A considerable number of these statutory changes came out of the work of the [2016 FIFA Reform Committee](#) chaired by Dr François Carrard – and in which Gianni Infantino took part as a UEFA representative at the time.

The duties of the president and of the secretary general are established in articles 35 and 36 of the approved Statutes and specified in articles 14 and 15 of the binding [FIFA Governance Regulations](#).

Less than two months after the Statutes came into force, the FIFA Council gathered in Mexico City ahead of the 66th FIFA Congress and appointed Fatma Samoura, from Senegal, as the FIFA Secretary General – the first woman ever to occupy this position and from a realm outside football. The choice was deliberate for an institution sorely in need of a fresh start.

Backed by a CV built on a 21-year career of development and humanitarian work with the United Nations, Ms Samoura took office in June, and has been at the helm of the FIFA administration since then. This means that, among other things, she chairs the organisation’s management board and is the ultimate decision-maker on all executive matters, including the processes of handling commercial contracts, structuring the organisation and hiring the senior executives responsible for each division.

In fact, shortly after taking office, the secretary general announced a new structure for the FIFA administration – one that aimed to mirror and catalyse the principles of the reformed Statutes. The general secretariat was split in two branches, each overseen by a deputy secretary general: one responsible for all administrative aspects of the institution – i.e. the Commercial, Finance, HR & Services, Legal & Integrity divisions – and one for matters directly related to football.

These are executive decisions and, as such, are made by the secretary general, who reports to the FIFA Council through the office of the president (FIFA Governance Regulations, article 15.3).

It is one of the president’s duties, in turn, to propose the guidelines for FIFA’s overall strategy to the Council (FIFA Governance Regulations, article 14.4a), as was the case in October 2016 with the unveiling of “[FIFA 2.0: The Vision for the Future](#)”. It is now the responsibility of the general secretariat to implement the necessary measures to fulfil the mission set out in that strategic roadmap.

The split of duties and responsibilities between the president and the secretary general is as clear in FIFA’s legal framework as it is in the organisation’s day-to-day work and decision-making process.

b) Appointment of independent members of committees and judicial bodies

The draft report states in part B, chapter 2.1, point 24 inter alia: "Regarding the recent developments at FIFA, I have especially strong reservations concerning the loss of independence for the so-called 'independent' bodies." This, again, is a product of none other than personal assumptions. And, again, it gets the facts outright wrong. The accurate account follows below.

One of the cornerstones of FIFA's institutional reforms is to ensure efficiency from [the organisation's bodies](#) – which was the rationale behind the reduction in the number of standing committees from 26 to nine – and transparency in the process of appointing and dismissing its members.

The reformed FIFA Statutes have broadened the list of committee members that must be independent, according to the criteria set out in article 5 of the FIFA Governance Regulations. Therefore, from 2016 the independence criteria do not only apply to the members of FIFA's independent committees – i.e. the Audit and Compliance Committee and the judicial bodies, namely the Disciplinary Committee, the Appeal Committee and the Ethics Committee – but also to the members of the Governance Committee, the Finance Committee, the Development Committee and the Development Bureau that require independence according to the pertinent provisions of the FIFA Governance Regulations¹.

The Review Committee conducts independence reviews in respect of candidates and incumbent members of the independent committees as well as those of the Finance Committee and the Development Committee who must fulfil the independence criteria (FIFA Statutes, articles 41.2 and 42.1). The independence review for the members of the Governance Committee, of which the Review Committee is part, is conducted by the investigatory chamber of the Ethics Committee.

The process to appoint and dismiss members of independent committees is also founded on the principles of participation and democracy. While members of the standing committees are appointed by the Council on the proposal of the member associations (FIFA Statutes, article 39.4), it is the FIFA Congress – the institution's supreme legislative body, with representatives of the 211 member associations – that elects the chairpersons, deputy chairpersons and members of the Audit and Compliance Committee and the judicial bodies (FIFA Statutes, articles 51.3, 52.5, 27.7; FIFA Governance Regulations articles 8.2e, 8.3).

These mechanisms to secure independence and transparency have been duly followed by FIFA since the approval of the reformed FIFA Statutes and have been steering the efforts to ensure that its bodies are comprised of recognised experts and that the process of filling these positions is done with an international perspective and gender diversity in mind.

Naturally, this was also the case in the lead-up to this year's 67th FIFA Congress in Bahrain. In fact, the list of candidates submitted for election to that Congress was the result of a democratic consultation process, in which:

¹ No fewer than half of the members of the Governance Committee composed of at least three and not more than 12 members, including its chairperson and deputy chairperson (art. 27 par. 1 of the FIFA Governance Regulations), no fewer than half of the members of the Finance Committee composed of at least three and not more than 12 members (art. 28 par. 1 b of the FIFA Governance Regulations), and no fewer than half of the members of the Development Committee composed of at least three members and the Development Bureau composed of the chairperson and/or deputy chairperson and at least one member of the Development Committee selected by the chairperson or deputy chairperson (art. 29 par. 1 and par. 3 of the FIFA Governance Regulations) shall fulfil the independence criteria defined in art. 5 of the FIFA Governance Regulations.

- a) the six confederations proposed a slate of international candidates;
- b) these candidates were added to a list that included the current members;
- c) FIFA and the confederations reached a unanimous consensus on the list to be submitted to the FIFA Council, taking into account professional excellency, reputation, diversity and gender balance;
- d) the FIFA Council unanimously approved a list of candidates to be voted on by the Congress;
- e) the FIFA Congress elected the members of the standing committees and judicial bodies.

Adding to the above, it is questionable, to say the least, if a similar democratic process has been followed in past appointments — whereby, for example, 4 out of the 5 chairmen of the independent committees and judicial bodies were Swiss or German nationals, in a time when the then FIFA president was himself Swiss-German (on another note, the only chairman coming from a different region was the president of a member association in the Caribbean).

Furthermore, to question the expertise of the candidates voted by the 67th FIFA Congress is to disregard some of the highest positions and most respected titles across the six continents. It is an objective stance and clear to see: in the history of FIFA — in fact, of any sports organisation — the key positions in these bodies have never been occupied by individuals of such high standards:

- Adjudicatory chamber of the Ethics Committee:
 - Chairman is Vassilios Skouris (Greece), former and longest-serving President of the European Court of Justice;
 - Deputy Chairmen are Fiti Sunia (American Samoa), judge and former attorney general and Sundra Rajoo (Malaysia), director of the Kuala Lumpur Centre for Regional Arbitration.
- Investigatory chamber of the Ethics Committee:
 - Chairwoman is Maria Claudia Rojas (Colombia), former President of the Council of State²;
 - Deputy chairmen are Bruno de Vita (Canada), Queen’s Counsel, and Martin Ngoga (Rwanda), former Prosecutor General.
- Governance Committee:
 - Chairman is Mukul Mudgal (India), former Chief Justice of the Indian High Court;
 - Deputy Chairman is Olli Rehn (Finland), former Vice-President of the European Commission.
- Audit and Compliance Committee:
 - Chairman is Tomaž Vesel (Slovenia), President of the Court of Auditors in Slovenia;
 - Deputy chairman in Christopher Mihm (USA), Chairman of the Independent Audit Advisory Committee of the United Nations.
- Disciplinary Committee:
 - Chairman is Anin Yeboah (Ghana), Supreme Court Justice;

² Ms Rojas has worked for 25 years in the judicial branch, both in the Constitutional Court and the Council of State, of which she was President. Mr Andres Pastrana, former President of Colombia, sent a letter to the Council of Europe in relation to the critics towards Ms Rojas, her function and the Spanish language. The letter can be found on his twitter account under the following link: <https://twitter.com/AndresPastrana/status/940985754079068161>

- Deputy Chairman is Alejandro Piera (Paraguay), lawyer and university lecturer with extensive international experience.
- Appeal Committee:
 - Chairman is Thomas Bodstörm (Sweden), former Minister of Justice and elite football player;
 - Deputy Chairman is Neil Eggleston (USA), law professor and former White House Counsel.

It is up to any reader to compare these CVs with those of the previous office holders and make a judgement based on facts, and not on speculation.

Finally, as also wrongly stated in the draft report, to assume that governance solidity within FIFA may depend on the maintenance of a few specific individuals — and individuals who were elected or appointed under the old regime, through processes that were not transparent — is to disregard completely the very nature of the reform process.

Therefore, the draft report is again speculating in part B, chapter 2.1, point 48, when it states that “the true independence of FIFA supervisory bodies does not seem to be secured. This is also the conclusion of all the experts external to FIFA whom I met.” It is yet another showing of vague personal inference, in nothing consistent with the facts.

c) Enhanced oversight and accountability

The draft report states in part B, section 1, point 6: “Financial malpractices within FIFA, linked to a lack of transparency which the Assembly has been criticising for several years, are a further sign of this culture, of which FIFA and world football are victims.”

Again, the considerable progress that has taken place in the past couple of years and the tangible results of the measures taken are completely disregarded in this assessment. The author makes no distinction between the old and the new FIFA.

The facts are as follows:

Based also on the strategic input of the Council, the administration considers the strict control of monetary flows a fundamental aspect of implementing the reforms and establishing a culture of zero-tolerance towards wrongdoing. Steps taken in this regard:

- FIFA has opted for the **early adoption of the new accounting standard IFRS 15** “Revenue from Contracts with Customers”, having become the first sports organisation to do so. This accounting standard specifies how and when revenue is recognised in IFRS reports and ensures the comparability of each year over the four-year cycle, something crucial for the nature of FIFA’s business. Furthermore, the same IFRS 15 standards are applied to budgets, which were previously calculated using a straight, “cash” method. The standardisation allows for full transparency in budget analysis and for any budget deviation to be clearly and promptly identified.
- FIFA has enhanced transparency also through its publicly available annual report which consists of three separate documents: the [Activity Report](#), the [Financial Report](#) and the [Governance Report](#).

With the 2016 edition, FIFA introduced the **disclosure of the individual annual compensation** of the president, the vice-presidents and members of the Council, the secretary general, as well as the

compensation of the chairperson of the Audit and Compliance Committee and the costs of the judicial bodies (FIFA Statutes, article 51.10; FIFA Governance Regulations, article 6).

FIFA has also introduced term limits of no more than three terms of office of four years for the FIFA President and the FIFA Council members (FIFA Statutes, article 33.2 and 3). In addition, there are term limits (max. three terms of four years) for all members of the FIFA judicial bodies (FIFA Statutes, article 52.5, 52.6) as well as for the members of the Audit and Compliance Committee (FIFA Statutes, article 51.3, 51.4).

- The establishment of **an empowered Compliance Division** for internal audit: this division is developing an overarching compliance programme, including such key components as anti-bribery and anti-corruption policies, employee training, monitoring of the internal whistle-blower hotline, compliance risk assessments; advising and supporting FIFA employees and the publication of a Code of Conduct for FIFA team members.
- Following a thorough and open selection process conducted by FIFA with several different auditing companies, PricewaterhouseCoopers AG was appointed as the **new statutory auditors** of FIFA, having submitted their first full auditing report as part of the Financial Report 2016.
- With its **Forward Programme**, not only did FIFA increase its investment in football development to unprecedented levels, it did so under a new controlling policy designed to meet international standards of prudent management and transparency. With FIFA Forward, each member association is guaranteed financial support of up to USD 5 million over a four-year cycle. In order to receive that funding, every football development programme is governed by a **contract of agreed objectives** signed by FIFA and the respective member associations.

All projects require the approval of the FIFA administration, but those costing more than USD 300,000 also have to be approved by the Development Committee. Regardless of cost, all projects are monitored by the FIFA administration. Member associations have to use a dedicated bank account to process all development funding and must provide an annual audit report that will be thoroughly checked by FIFA. Each member association also has to submit an annual general audit report, which will then be checked by independent auditors.

To disavow the considerable steps that have taken place and to insist on not making any distinction between the past and the present is a plain distortion of reality.

Transparency and values

a) Bidding processes

When the draft report touches upon the binding obligations for countries willing to host a major football competition (part A, points 11.2.1 and 11.2.2), it fails to acknowledge the pioneering bidding process for the 2026 FIFA World Cup™, which is not mentioned until much further, on page 15. Below is a complete account of the aspects overlooked by the author.

It is FIFA's responsibility towards the world of football to conduct the bidding and selection procedures of tournament host countries in an ethical, transparent, objective and unbiased way. This is particularly imperative for the FIFA World Cup™.

The bidding process to select the venue for the 2026 FIFA World Cup, whose [regulations](#) were approved by the FIFA Council in October 2017, strives to be a textbook example of that. FIFA has recently published a [complete guide to the process](#), which includes all relevant documents, such as the bid rules of conduct, the bidding requirements and an overview of the requested government support. The guide breaks down the enhanced process and its key elements:

- The reformed FIFA Statutes establish that the FIFA Congress, and not the FIFA Council, decides the venue of the FIFA World Cup (article 6g). The Bidding Regulations specify the transparent process that leads to the vote by the FIFA Congress:
 - The [2026 Bid Evaluation Task Force](#) prepares a Bid Evaluation Report, which is made public;
 - Based on these reports, the FIFA Council shortlists the bids that qualify to be voted on by the FIFA Congress. Each individual vote is disclosed publicly;
 - The FIFA Congress votes and, again, every individual vote is made public.
- The Bid Evaluation Report comprises three essential elements: a compliance assessment, a risk assessment and a technical evaluation report. The scores in this technical evaluation report have a bearing on whether or not a bid qualifies to be shortlisted by the FIFA Council. Furthermore, for the first time, the bidding process is scrutinised by an independent audit company.
- The commitment to respect human rights enshrined in article 3 of the FIFA Statutes and specified in the organisation's [Human Rights Policy](#) is reflected in FIFA's activities in connection with hosting the FIFA World Cup. These must be based on sustainable event management principles – in line with ISO 20121 – and respect international human rights and labour standards in accordance with the United Nations' Guiding Principles on Business and Human Rights. Based on this, FIFA also requires the implementation of human rights and labour standards by the bidding member associations, the government and other entities involved in the organisation of the tournament, such as those responsible for the construction and renovation of stadiums, training sites, hotels and airports.

b) Promotion of human rights

The "Good football governance" draft report recognises the strides made by FIFA to respect and advocate for Human Rights. However, a few clarifications in this regard are still necessary, since part of the groundwork was either imprecisely described or downplayed:

- FIFA has included a new article in its Statutes approved in February 2016 (article 3) to respect all internationally recognised human rights and to strive to promote the protection of these rights. FIFA has also hired a Human Rights Manager to lead the day-to-day planning, coordination and implementation of FIFA's work on human rights.
- In June 2017, FIFA published its [Human Rights Policy](#), which was developed by the FIFA administration in collaboration with FIFA's Governance Committee. It is in accordance with the UN Guiding Principles on Business and Human Rights, the authoritative international standards on the topic developed by Harvard Kennedy School's Prof. John Ruggie. Prof. Ruggie was also asked to write an independent [report](#)

regarding the integration of human rights aspects in FIFA policies and practices, which was published in April 2016.

- FIFA's Human Rights Policy was published alongside an [Activity Update Report](#) on FIFA's work on human rights during the first year after the implementation of FIFA's statutory human rights commitment.
- In November 2016, FIFA set up an independent Human Rights Advisory Board, composed of international experts from the United Nations, trade unions, civil society and business. The purpose of the Advisory Board is to provide FIFA with external, expert advice and support for its efforts to implement article 3 of its Statutes. The mandate and working methods of the advisory board are outlined in the [terms of reference](#). The [first report](#) of the Advisory Board was published on 9 November 2017.
- In June 2016, FIFA launched a **tailor-made monitoring system**, developed together with the Local Organising Committee of the 2018 FIFA World Cup, to ensure decent working conditions in the stadiums being built or renovated for the event in Russia. An independent partner – the Klinsky Institute of Labour Protection and Working Conditions – is tasked with regularly examining whether the working conditions on the construction sites comply with applicable conventions of the International Labour Organization, the laws of the Russian Federation, and the best practices to ensure decent work conditions.

The monitoring team has been visiting each of the ten stadiums under construction on a quarterly basis to review relevant documentation, such as labour contracts and health and safety procedures, inspect the construction sites, interview construction workers, verify whether previous recommendations have been implemented, and provide training on decent working conditions to construction supervisors. Since the launch of the system, 72 visits have been carried out.

- To ensure that the monitoring process is up to the highest international standards, FIFA has signed a **memorandum of understanding** with the Building and Wood Workers' International (BWI) and the Russian Construction Workers Union (RBWU). As part of that collaboration, Russian and international trade union representatives participate in monitoring visits and verify the results and recommendations that are included in the reports to the companies. Out of the 33 visits carried out in 2017, 23 were attended by trade union representatives. In none of the joint inspections carried out so far did the trade union representatives disagree with the assessment and recommendations made through the monitoring system. As is the case with FIFA and the LOC in Russia, the Supreme Committee for Delivery and Legacy of the 2022 FIFA World Cup in Qatar is also collaborating with BWI.
- FIFA fully recognises its responsibility under the UN Guiding Principles on Business and Human Rights to help ensure respect for **workers' human rights on construction sites that are directly linked to the 2022 FIFA World Cup** – with a priority to competition venues (i.e. stadiums, training sites and fan fest sites). These sites are under the purview of the Supreme Committee for Delivery and Legacy (SC), whose responsibility is to enforce the [Supreme Committee's Workers' Welfare Standards](#). The implementation of the standards is monitored by a four-tier monitoring system, including self-assessments by the contractors, audits by the SC, audits by an independent third party (the British company Impactt Ltd.), and audits by the Qatari Ministry of Labour. In April 2017, Impactt Ltd. published its [first public report](#) based on inspections carried out in August and November 2016 and in January 2017

Beyond that, the SC is actively engaging with entities responsible for other construction sites somehow related to the tournament – such as those related to transportation systems or accommodation – to promote the implementation of the Workers’ Welfare Standards or comparable standards. FIFA is pleased to see the increasing influence of the Supreme Committee’s experiences on other construction projects in Qatar.

- FIFA has been engaging with the Qatari authorities in support of the labour reform process and welcomes the commitment of the government of Qatar to take decisive steps in that direction as part of the **technical cooperation agreed upon with the International Labour Organization (ILO)** in November 2017. Landmark progress has been made in the area with the abolishment of the “kefala” labour system — something unprecedented in a country within the Gulf Cooperation Council (GCC).

In this respect, it would be expected from an objective report to use the above measures as examples of best practice and encourage other bodies to follow FIFA’s footsteps.

c) Fostering equality

In its recommendations section (part A, points 11.2.9 and 11.2.10), the draft report conjectures about “*using a higher percentage of their resources to promote women’s football and launching an information campaign to combat sexual harassment and gender discrimination.*” Again, this fails to properly acknowledge FIFA’s most recent measures in that respect, which are the subject of only a few scattered references much further into the report, on page 16-17. The facts are as follows below.

The FIFA Statutes’ pledge to combat discrimination is being incorporated into all that FIFA does. These are certainly not definitive solutions to the inequality that is present across society at large, but they are concrete steps in the right direction:

- FIFA now counts on **more women than ever** in key management positions – starting with Secretary General Fatma Samoura and including two female chief officers, a Chief Women’s Football Officer of the recently created Women’s Football Division and a Chief Member Associations Officer. As of Q4 2017, the FIFA administration consists of 45% women and 28% of leadership positions are occupied by women (compared to 0 beforehand).
- The more prominent participation of women in the FIFA Council, which is set out in the Statutes (article 33.5), has been mirrored in the **composition of the standing committees**, in which the representation of women has risen to an unprecedented level. It is now FIFA’s duty to encourage the confederations and member associations to adopt these principles of inclusivity.
- During the 2018 FIFA World Cup qualifiers, FIFA implemented an **Anti-Discrimination Monitoring System**. In collaboration with Fare Network, an NGO working on anti-discrimination in football, FIFA assessed all 871 qualifying matches and deployed anti-discrimination observers to 176 of them – those in which a heightened risk of discriminatory incidents had been identified. The information gathered by these independent observers helped to facilitate the work of FIFA referees and disciplinary bodies in responding to discriminatory incidents.

For the referees, this evidence helps to decide on whether to activate the so-called **three-step procedure**, a stance that was first implemented by FIFA during the FIFA Confederations Cup 2017. This procedure allows referees and match officials to respond to discriminatory incidents by triggering a stadium announcement, by interrupting the match for a certain period or, as an ultimate measure, by discontinuing the game. For the FIFA disciplinary bodies, the evidence gathered by the observers in the stadiums allows FIFA to address the issue through its legal procedures. Incidents reported during the qualifiers have led to several football associations being fined for discriminatory conduct, which played an important role in raising awareness to the issue of discrimination in football.

An objective report would encourage other sports bodies to follow FIFA's example in this respect.

d) Ethics in the football business

In part B, section 3.3 of the draft report, the author raises points regarding the protection of minors and the transfer market and, again, fails to mention the substantial efforts made by FIFA in that respect:

As omnipresent as the game of football is, it encompasses a myriad of dynamics that require regulation so that ethical and fair behaviour is safeguarded. A few recent steps in this direction:

- FIFA works to protect the **rights of players younger than 18**, whether male or female, amateur or professional. This is primarily done through the enforcement of regulations prohibiting the international transfer of a minor, or the first registration of a minor in a country of which he/she is not a national, except in specific and verifiable circumstances. An international transfer of a minor player cannot take place unless one of the exceptions outlined in article 19 paragraph 2 of the [FIFA Regulations on the Status and Transfer of Players](#) or the so-called "five-year rule" (cf. article 19.3 and 19.4 of those regulations) apply.

Equally, subject to certain strict prerequisites being met, refugee players or exchange students may, on limited occasions and with extreme reservation, be authorised to transfer internationally. The sub-committee of the [FIFA Players' Status Committee](#) is charged with reviewing applications for these cases, taking into consideration the specific circumstances of each individual case while recognising the opportunities for integration that football certainly offers. These regulations, combined with the administrative procedure in place for the submission of minor applications via [Transfer Matching System](#), allows FIFA to prevent the discrimination against and unfair treatment of foreign minor players and ultimately to protect the youngest participants in the game.

- Understanding and enhancing the control mechanisms to **regulate the transfer market** – from financial fair play to the role of intermediaries – is being treated as a top priority at FIFA, so much so that it is a key part of the consultation phase with the member associations by means of the FIFA Executive Football Summits.
- FIFA's Football Stakeholders Committee has established a task force to study and conduct a broader **review of the transfer system**. Joint initiatives include the continued rollout of club licensing, establishment of national dispute resolution chambers, and exploring minimum contract requirements with all stakeholders at global level. The health and safety of the players will be addressed, in particular in relation to the international match calendar, which is set to be discussed with all stakeholders. Furthermore, FIFA and FIFPro – the worldwide representative organisation for 65,000 professional footballers – are committed to respecting internationally recognised human rights, particularly in view of

how they apply to professional football, as well as promoting equality and the interests of female players, the growth of professional women's football, and women in football.

- In November 2017, **FIFA and FIFPro** concluded a wide-ranging six-year cooperation agreement to strengthen relationships between the two organisations and improve the governance of professional football worldwide. Additionally, an accord has been reached between FIFA, FIFPro, the European Club Association and the World Leagues Forum under the umbrella of FIFA's newly formed Football Stakeholders Committee, which includes confederations, member associations and professional football stakeholders. The new rules will streamline dispute resolution between players and clubs, particularly for decisions in cases of overdue payables. The changes will also introduce a new provision to avoid the abusive conduct of parties.
- In February 2017, FIFA signed an [agreement with Sportradar Integrity Services](#) to protect the integrity of the game: under the new contract, the global leader in match manipulation detection and prevention provides FIFA with a full suite of monitoring, education and intelligence services to further strengthen the prevention of fraud around the globe.
- To ensure that FIFA's stance on ethical behaviour and prevention of wrongdoing is up to the highest and most updated standards, a full **revision of the FIFA Code of Ethics** is currently ongoing, and will be finalised and published in the first half of 2018.

Concluding remarks

All the points above are strictly factual and are not mentioned, or not adequately reported, in the draft report.

Over the last two years, FIFA has been engaged in a resolute effort to enhance its governance mechanisms. Many hours of hard work have been invested, many deeply rooted paradigms have been challenged and many concrete measures have been adopted. A lot of these have already resulted in tangible, substantial change.

FIFA feels it is important to specify what these changes are and considers it unfair that they are not reflected in a report that, even if drafted by an individual member, emerges from such an institution as the Council of Europe. FIFA reckons that personal assumptions and conjectures do not belong in a report by the continent's leading human rights organisation, let alone as part of its argumentative grounds.

Our idea of a report of this kind is of one whose goal is to exchange information, to lead to an open cooperation and, eventually, to use the power of football as a force for good. This can only be accomplished by means of a proper progress assessment; of constructive criticism based on facts, and not on personal suppositions or rumours.