



DEUTSCHER  
FUSSBALL-BUND

# DFB HUMAN RIGHTS POLICY

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# POLICY COMMITMENT ON HUMAN RIGHTS

With more than 7 million members, the German Football Association (DFB) is the largest single sports association in Germany. As a not-for-profit association committed to the common good, the DFB promotes top-level, amateur and recreational sport to a high degree. It consists of an unparalleled network of clubs and a culture of volunteerism that make the DFB an important part of social life and social participation. Football moves and affects millions: It brings about opportunities for diverse voluntary work as well as jobs, promotes cohesion in the communities, helps shape the development of our country and strengthens diversity, equality, honesty, fairness and integrity.

The DFB assumes the outstanding social, societal and sport policy responsibility that comes with its position. It aims to organise football in a sustainable and successful manner and use its diverse potential responsibly to maintain and strengthen the democratic foundations of a free society in order to support positive social change processes beyond the game. To this end, the DFB, together with its member organisations and the clubs, has established a large number of socio-political projects and initiatives in addition to the wide range of sporting and social activities in football. The DFB's value orientation is an integral part of its Statutes (Article 2 and Article 4) and regulations, its Code of Ethics and its other rules and policies. It thus provides the guidelines that are already actively lived out by the DFB today. The principles of sustainability in its three ecologic, economic and social dimensions are core principles for action in line with the UN Sustainable Development Goals.

In keeping with the above-mentioned principles, the DFB is committed to respecting all internationally recognised human rights in accordance with Article 2(2) of its Statutes. This Policy supplements the DFB's commitment to human rights and serves to implement it.

The DFB is committed to respecting human rights within the scope of its activities in fulfilling its human rights due diligence obligations in accordance with the UN Guiding Principles on Business and Human Rights (UN Guiding Principles; UNGP) and the National Action Plan on Business and Human Rights (NAP) of the German Federal Government. This also includes making use of its social influence. The DFB recognises the universality, indivisibility and inalienability of human rights. Particular consideration must be given inter alia to the rights contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including the eight ILO core labour standards (cf. Guiding Principle 12; NAP, p. 5).

The DFB resolutely opposes the violation of human rights, anti-constitutional and xenophobic endeavours as well as any form of violent, discriminatory or inhuman attitudes and behaviour. This also applies to any form of violence, regardless of whether it is physical or mental in nature. The DFB is particularly committed to protecting children and youth from sexualised violence and to safeguarding the rights of particularly vulnerable groups of people.

Respect for human rights is a common, organisation-wide task and responsibility of the DFB. Adopted at the highest level by the DFB Presidential Board, this Human Rights Policy applies to all DFB bodies, officials and full-time employees as well as to all companies in which the DFB holds a majority of shares or voting rights. It also defines the DFB's expectations toward third parties in their activities linked to the DFB; this includes all competitions organised by or under the direction of the DFB. This Human Rights Policy shall serve DFB member organisations and their structures as a basis for introducing human rights due diligence in their respective activities and business areas.






# HUMAN RIGHTS DUE DILIGENCE

The following steps are decisive for carrying out the DFB's human rights due diligence in practice. They are based on the corporate responsibility to respect human rights set out in the UN Guiding Principles (UNGPs) and the NAP, which has been transferred to the specific situation of the DFB, taking into account its scope of activities in organised sport:

## 2.1 IMPACT ON HUMAN RIGHTS



In view of the complexity of its tasks and relationships, the DFB's activities can, in addition to many positive effects, also have adverse human rights impacts on various groups of people. The DFB as a principle aspires to avoid causing or contributing to adverse human rights impacts through its own actions. The DFB also endeavours to prevent or mitigate adverse human rights impacts that are directly linked to its activities, products or services by its business relationships, even if it has not itself contributed to these impacts (cf. Guiding Principle 13; NAP, p. 7f.).

Potential and actual adverse human rights impacts can occur in all areas of activity on and off the pitch, in the organisation of competitions or through inadequate working conditions for DFB staff or in DFB-related supply chains. Selected, overarching fields of action of the DFB that are relevant to human rights are presented in more detail in the annex entitled “Fields of Action and Implementation”.

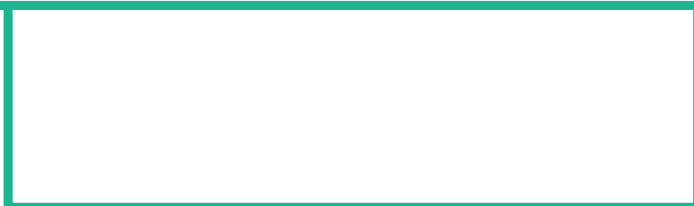
## **2.2 HUMAN RIGHTS RISK ANALYSIS**

The DFB regularly identifies and assesses potential and actual human rights risks for affected persons arising from or in connection with its activities (“human rights risk analysis”). In doing so, it takes into consideration both internal and external expertise. If the DFB determines that the risk of human rights impacts is particularly high for certain potentially affected groups, an in-depth assessment involving these groups may be necessary (cf. Guiding Principle 18; NAP, p. 8f.).

## **2.3 MEASURES FOR AVERTING RISKS**

On the basis of this human rights risk analysis, the DFB in its own capacity or in cooperation with partners takes measures to prevent or avoid contributing to potential and actual adverse impacts on the human rights of affected persons within the scope of its activities and to adequately counteract any adverse impacts that may have occurred.

Corresponding measures could include training measures for certain employees, the provision of information to third parties, cooperation with other stakeholders in sport, etc. The DFB’s existing commitment – for example with regard to the participation of persons with disabilities, the power of integration, the promotion of fair play and a diverse fan culture or measures to prevent violence and to achieve equality, including within the framework of the DFB Master Plan for Amateur Football – is an important basis for this (cf. Guiding Principle 19; NAP, p. 9).



## **2.4 INFLUENCE ON THIRD PARTIES**

In order to mitigate or avoid adverse impacts on the human rights of affected persons, the DFB exerts its influence in relation to potentially and actually adverse impacts on human rights whenever its organisational form or business relationships permit. To this end, the DFB considers and uses appropriate options available to it in light of its association structure, its role in society and its business and contractual relationships. However, withdrawal from certain activities as a consequence of third-party behaviour should only be considered as a last step in exercising this influence (cf. Guiding Principle 19; NAP, p. 9).

## **2.5 COOPERATION, DIALOGUE AND EFFECTIVENESS TRACKING**

Cooperation and dialogue with internal and external stakeholders – first and foremost, the DFB’s member organisations – is an integral and indispensable part of the DFB’s human rights due diligence. The DFB will make use of existing partnerships and collaborations or establish new ones to support the implementation of this Policy.

This includes regular exchanges on issues relating to human rights with civil society organisations, potentially affected groups and individuals, their legal representatives, as well as with regional and national associations, clubs, players, representatives from politics, sport, media and business, fans, cities, etc. involved in the organisation of DFB competitions, as well as with DFB sponsors and business partners, service providers and suppliers. The corresponding cooperation and dialogue are intended to serve, inter alia, the effectiveness tracking and the further development of measures taken (cf. Guiding Principle 21; NAP, p. 7ff.).

## **2.6 EXISTING AND NEW STRUCTURES**

To carry out human rights due diligence, the DFB can build on proven structures and procedures. The DFB has important starting points for preventing and effectively handling adverse human rights impacts. With the Person of Trust to ensure compliance in voluntary work, the Ombudsperson for match-fixing, the DFB whistleblower system, the Ethics Committee and the jurisdiction of the DFB, key areas and structures are in place that can be built upon.

The DFB will review and expand them and, if need be, introduce new structures and procedures to strengthen its human rights due diligence processes. The independent Ethics Committee, which already monitors compliance with the Code of Ethics, will take an important role in implementing this Human Rights Policy. The committee is particularly concerned with issues of fairness and integrity, which are also essential to respect human rights. In future, it will also advise the DFB Presidential Board on human rights issues as part of its statutory duties.

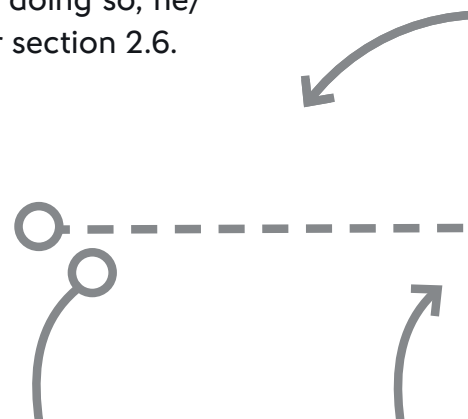
## **2.7 GRIEVANCE MECHANISM, REMEDY AND REDRESS**

The DFB is aware that, despite its human rights due diligence, human rights infringements may still occur in connection with its activities. The DFB, therefore, aims to enable access to an effective grievance mechanism and, in the event of actual adverse human rights impacts caused by its business activities, access to remedy and redress for those affected. To this end, it is planned to create an effective human rights complaints management system or, alternatively, to take active part in an external procedure. As a perspective, this shall be made publicly accessible. The possibility of anonymous complaints shall be considered as a part of this. The appropriate procedures and approaches for establishing such a mechanism shall be scrutinised with the involvement of internal and external expertise.

In the event of the occurrence of adverse human rights impacts, which the DFB did not cause or contribute to, but which are directly linked to its business activities due to a business relationship, the DFB endeavours to support in an appropriate manner those affected in seeking remediation (cf. Guiding Principle 22; NAP, p. 9f.).

## **2.8 DISSEMINATION, CONSIDERATION AND RESPONSIBILITIES**

The DFB actively communicates its Human Rights Policy both internally and externally. The DFB ensures that it is observed by its full-time staff. Operationally, the DFB General Secretary is responsible for implementing the DFB's human rights due diligence in the main office. In doing so, he/she takes into consideration the structures referred to under section 2.6.





The DFB is also committed to ensuring that its member organisations, business and contractual partners carry out human rights due diligence in their DFB-related activities, including in their value and supply chains.

In view of the fundamental contribution to football in Germany made by thousands of volunteers every day, the DFB is particularly committed to raising awareness of the principles contained in this Policy among its volunteers at all levels.

## **2.9 INTERNATIONAL LEVEL**

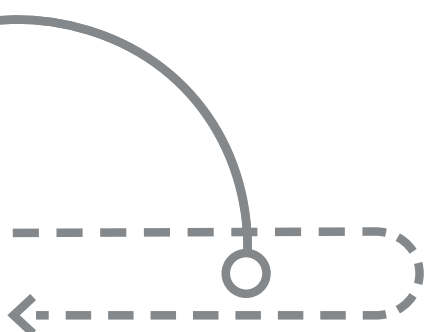
The DFB will also represent the principles laid down in this Human Rights Policy at international level and, through its membership in the relevant bodies of UEFA and FIFA, will use its influence to ensure that the principles of human rights due diligence are taken into account. In the spirit of the coherent and continuous development of human rights due diligence in sport, the DFB will follow relevant national and international developments and examine their relevance for its own actions.

With this Human Rights Policy, the DFB shares and supports the fundamental principles and expectations enshrined in FIFA's Human Rights Policy.

## **2.10 REPORTING AND FURTHER DEVELOPMENT**

As part of its sustainability reporting, the DFB will regularly report publicly on its commitment to human rights and the progress made in carrying out its human rights due diligence. It will take part in international and national dialogues on human rights in sport, in particular with the aim of sharing experiences, exchanging about learning processes and in order to further develop its own approach to human rights due diligence.

The DFB will conduct regular reviews of its human rights due diligence and continuously develop the content of its human rights approach in line with developments in its field of activity, taking into account internal and external expertise.



# ANNEX: FIELDS OF ACTION AND IMPLEMENTATION

Building on the DFB's central socio-political thematic areas, as part of an initial analysis, the DFB's activities were reviewed in terms of their human rights relevance. The following overarching fields of action identified in the process are to be understood as examples of areas in which an infringement of human rights of various groups of people can occur in connection with DFB activities.

In the future, the DFB will take into account the results of its human rights risk analyses and effectiveness tracking to identify fields of action and implementation and to contribute to mitigating and avoiding identified human rights risks by taking appropriate measures.

## **COMMITMENT AGAINST DISCRIMINATION AND RACISM – FOR RESPECT AND DIVERSITY**

The DFB stands for football that is open to all. It regards diversity as a strength and participation as an opportunity that enriches society and organised football. It is committed to protecting all those involved in football from discrimination and actively opposes discrimination and racism.

The DFB aims to create and maintain a discrimination-free environment within the organisation and in all its activities. At its own events, it shall take action against any form of discrimination in line with the DFB Statutes and its Code of Ethics, as well as Article 4 of FIFA's Statutes and paragraph 5 of FIFA's Human Rights Policy. Accordingly, any discrimination, harassment or insult of any country, individual or group of individuals on the grounds of sex, ethnic, national or social origin, colour, religion, age, disability, lan-

guage, political or other opinion, property, birth or other status, gender identity or sexual orientation or any other ground is prohibited. The DFB also takes appropriate measures to prevent all forms of harassment, including sexual harassment.

The DFB attaches particular importance to the equal participation of all population groups – not only in the game but also in all areas and functions of sport. In an effort to ensure this, the DFB is developing programmes to promote girls and women, as well as female coaches and referees, in an attempt to make them more publicly visible – on the pitch, as leaders, and in administrative functions. By doing so, the DFB can strengthen its position in society and secure its base of voluntary and full-time staff in the long term.

Together with its member organisations, the DFB develops framework conditions for training and match operations, carries out education and awareness work, and uses its influence in society through active communication against discrimination.

## **COMMITMENT AGAINST VIOLENCE AND HEALTH RISKS – FOR FAIR AND HEALTHY FOOTBALL**

Organised football makes an important contribution to improving health in Germany by offering low-cost physical activity programmes throughout the country. The DFB determinedly counters possible risks to health – in the sense of the World Health Organisation’s definition of physical, mental and social well-being – by taking and offering appropriate measures.

### **VIOLENCE IN AMATEUR FOOTBALL**

Violence on and off the football pitch – sometimes even at lower youth level matches – poses particular challenges for the DFB and its member associations. This includes both physical and psychological violence, such as discrimination and insults. The DFB develops programmes for preventing violence as well as promoting conflict resolution skills, promotes mutual respect, and ensures the protection of referees in particular. The DFB prevents health hazards in match operations by means of appropriate training for coaches and other persons in charge as well as through educational and public relations work.

### **RISK TO CHILDREN’S WELL-BEING**

The well-being of children and youth in organised football is a particular

focus of the DFB. In order to perceive, recognise and avoid threats to the children's well-being, information and training formats that are tailored to the target groups are implemented. Moreover, framework conditions and structures are created in coordination with the member organisations. They are intended, in particular, to prevent the risk of physical, psychological and sexualised violence against children and youth. Intervention guidelines and external contact persons serve as a basis to handle cases correctly.

### **PREVENTING AND RECOGNISING INJURIES AND ILLNESSES**

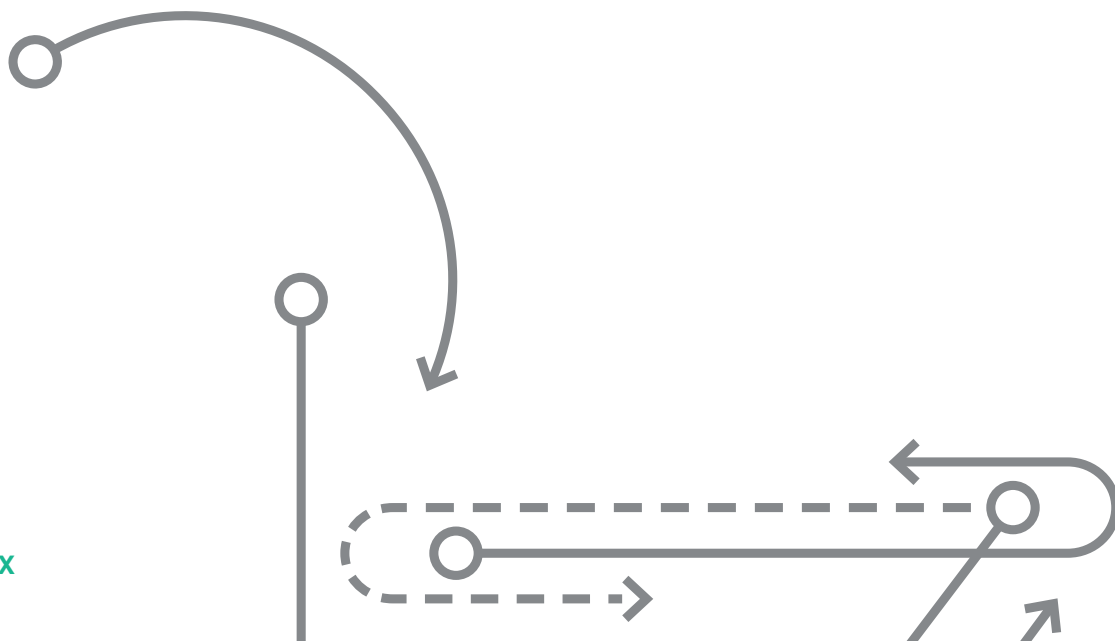
Every sport involves a certain risk of injury. Together with experts, the DFB is taking measures to reduce the risk and to recognise and deal with injuries and illnesses in an appropriate manner. This includes taking into consideration mental illnesses such as depression.

### **RECOGNISING AND COMBATING THE DANGERS OF ADDICTION**

The DFB actively promotes addiction prevention for children, adolescents and adults and encourages age-appropriate and developmentally appropriate coping strategies. The training measures include the areas of alcohol addiction, drug abuse (e.g. painkillers) and gambling addiction.

### **SAFETY AT EVENTS**

The DFB takes all possible measures to protect persons participating in DFB events. The DFB endeavours to use its influence with all the responsible bodies to ensure that all employees who provide security services at DFB events, including employees of private security companies, are trained to perform their duties in line with international security and human rights standards



## **INTEGRITY – IN SPORTING COMPETITION AND BUSINESS PRACTICE**

Fair competition with clear rules of the game is the basis for the appeal of the game of football. The DFB is passionately committed to a clean sport and against match-fixing and doping. Together with experts, it carries out prevention work and develops effective intervention measures. Doping cases and violations of the ban on betting and manipulation are consistently dealt with by the sports courts.

The DFB respects the applicable laws and regulations and complies with its Statutes and regulations as well as all other internal rules and policies. It resolutely rejects any form of corruption and unfair business practices. When selecting its partners from the business community, the DFB gives priority to reliability and responsible conduct. The DFB is committed to its social and societal responsibility, including in its business activities. It expects its partners to act accordingly and to demand the same from their suppliers and subcontractors.

## **UPHOLDING SOCIAL AND LABOUR STANDARDS**

The DFB aims to comply with and promote the highest international labour standards. This includes, in particular, the principles laid down in the eight main conventions of the International Labour Organisation (ILO core labour standards). With regard to its own employees, it adheres to the relevant requirements and procedures and works to ensure that labour standards are also observed by third parties in their activities affecting the DFB.

In view of the high proportion and importance of voluntary work in German football, the special protection of volunteers and their vibrant expression of civic commitment is one of the DFB's special duties.

In consideration of its competences, the DFB is committed to ensuring that human rights of professional football players are respected.

## FURTHER INFORMATION

United Nations Universal Declaration of Human Rights  
<https://www.ohchr.org>

FIFA's Human Rights Policy  
<https://img.fifa.com/image/upload/kr05dqyhwr1uhqy2lh6r.pdf>

Amnesty International  
<https://www.amnesty.org.uk/issues/sport-and-human-rights>

Centre for Sport and Human Rights  
<https://www.sporhumanrights.org>

Deutsches Institut für Menschenrechte  
<https://www.institut-fuer-menschenrechte.de>

Human Rights Watch  
<https://www.hrw.org/de>

Guiding Principles on Business and Human Rights of the United Nations  
[https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

National Action Plan for Business and Human Rights of the Federal Government  
<https://www.auswaertiges-amt.de/blueprint/servlet/blob/610714/fb740510e8c2fa83dc507afad0b2d7ad/nap-wirtschaft-menschenrechte-engl-data.pdf>

## PUBLISHER

Deutscher Fussball-Bund  
Otto-Fleck-Schneise 6  
60528 Frankfurt am Main  
Tel.: 069-67880  
DFB.de  
FUSSBALL.DE

