



Image: Gerard McGovern

Report

Human rights and mega sporting events

Wednesday 18 – Friday 20 November 2015 | WP1428

Held in Glion, Montreux (Switzerland)



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Introduction

The year 2015 has been a momentous one for global sport. There has been clear movement by leading sports federations to begin to address human rights concerns, in the midst of intense scrutiny of governance, transparency and integrity. It is clear that respect for international human rights standards applies to Mega-Sporting Events (MSEs) in many, and sometimes complex, ways. The need for constant vigilance to ensure the security of MSEs and all those involved has also become an issue of paramount importance going into the 2016 European Football Championships being held in France, and the Rio 2016 Olympic and Paralympic Games. Respecting the human rights of all concerned – workers, athletes, volunteers, fans, and local communities – requires the same levels of vigilance, international co-ordination, and shared effort as the execution of the games themselves.

The Wilton Park conference on Human Rights and Mega-Sporting Events (MSEs) brought together international experts with a collective global reach to more than 100 sport federations, 155 national business federations, 180 million workers and 10,000 athletes. Representing UN agencies, sports governing bodies, governments, local organising committees, sponsors, the wider business community, trade union confederations, civil society, academia and other experts with direct experience in the delivery and oversight of a major sports event, the conference participants discussed the human rights challenges that continue to face global sport as well as identified emerging examples of good practice and long-term solutions aimed at ensuring the responsible planning and delivery of such events.

Participants and conference organisers – the Institute for Human Rights and Business (IHRB), the Government of Switzerland and Wilton Park – discussed how MSEs can ensure respect for human rights and sustainable development including through the potential for a new permanent and impartial centre for learning and knowledge transfer, leadership and accountability across sporting traditions.

The year 2016 needs to be one of collective endeavour on MSEs, with stakeholders working together to agree and test new solutions. A proposed impartial centre for learning and accountability will need to help support methods for integrating human rights considerations into the planning and delivery of MSEs. All efforts must be rooted in normative standards, notably the UN Guiding Principles on Business and Human Rights (2011) (UN Guiding Principles) and the ILO Declaration on Fundamental Principles and Rights at Work (1998). Success will only be achieved if plans are seen to be inclusive and credible. This means that others need to be brought into the conversation from the North and the South, representatives of the sports federations, local organising committees, governments, sponsors, workers, fans, and athletes, through to those representing vulnerable and at risk groups.

Understanding the context and the challenges

1. The candidature, organisation and legacy of an MSE creates a concentrated, high-profile and voluntarily embarked upon project lifecycle that encompasses every aspect of the business and human rights agenda. The importance of positive social legacy is

also critical in the design and execution of an MSE, and offers the potential for human rights concerns to leave a positive mark for communities and nations who host such events.

2. Sport has many positive impacts. There is huge potential for MSEs to serve as a force for good; creating new jobs and boosting employability, improving essential infrastructure, regenerating urban areas, developing new social housing and public leisure spaces, increasing participation and healthy living, and precipitating shifts in public attitudes towards people with disabilities and women's participation in sport, all of which can help advance respect for international human rights principles and standards.
3. Despite the many benefits, longstanding campaigning efforts and investigations by civil society organisations, the media and others point to a range of human rights abuses linked to these events, which too often repeat from one MSE to the next across the typical 7-8 year event lifecycle. Recurring patterns of violations include forced evictions of residents and adverse impacts on the livelihoods of small businesses and street-vendors; poor or unsafe working conditions in the construction of sporting venues, essential supporting infrastructure and hotels, including workplace deaths and the exploitation of migrant workers in different parts of the world; and alleged sweatshop conditions in the supply chains for merchandise and materials. Immediately preceding or during the events themselves, additional abuses have included clampdowns on political dissidents, constraints on protestors and freedom of expression, unrestrained security or policing of communities, demonstrations of racism and homophobia against athletes and spectators, abuse or mistreatment of athletes, clearances of homeless people and street-children, and instances of child and adult sexual exploitation, with tens of thousands of people potentially affected by any one MSE. In this context, sponsors and commercial partners are commonly the focus of activist campaigns and public protest, and athletes are put under pressure to speak out.
4. Current momentum and commitment must be harnessed. Ahead of the Wilton Park conference, the International Labour Organization (ILO), the International Organisation of Employers (IOE), the International Trade Union Confederation (ITUC), and the United Nations Office of the High Commissioner for Human Rights (OHCHR), jointly affirmed that global sporting events should be planned and carried out with due respect for international human rights standards. They articulated a pressing need for a more comprehensive and consistent approach to managing social risks and adverse human rights impacts arising from MSEs. Turning this vision into reality will require concrete action.

Values, norms, and the need for leadership

5. The most emblematic Mega-Sporting Events are the Summer Olympic and Paralympic Games and the FIFA World Cup. Together with the Commonwealth Games, Rugby and Cricket World Cups, Winter Olympics and several other major championships, games and events, these festivals of sport involve enormous physical and commercial footprints, global media coverage, levels of participation, and potential to impact human rights.
6. Values are key. The major sports governing bodies share a commitment to values of respect, harmony among nations, solidarity and fair play. These values and the organisational culture of the principal sports governing bodies underpin their brand identity and resonance in society. Historically, each of the foremost MSEs has been a beacon for human rights, including in battles against Nazism, Apartheid or other forms of oppression. MSEs today need to build on and strengthen their commitment to human rights principles, including by recognising the rights of communities, workers, and athletes, and being inclusive of at risk groups including the LGBT community, women and children. Getting it right on human rights is not just about responsibility, but also about justice and opportunity. Sponsors and business in general have a vested interest

in protecting these values.

7. Action is needed to build social license. The social licence is the legitimacy required in the eyes of a community for a particular activity. It is not written (like a legal licence), cannot be self-proclaimed but requires an understanding of the pre-existing social contract within any society. Over the past two decades, a series of governance, corruption and human rights-related crises have negatively impacted the reputation of several major sporting traditions and highlighted failings in the organisational cultures and administrations that deliver MSEs. When one high profile brand is tarnished it has the potential to affect the reputation of all those in the same sector. And where governance is inadequate, protection of human rights often suffers. It is therefore not surprising that the longstanding 'autonomy of sport' concept risks losing credibility. Some question whether sport has started to see itself as being above the law, and there is now wide support for ensuring that sport does not abuse its 'special case' status. As in other sectors globally, social license has to be earned, it cannot simply be asserted. Societal expectations are higher than they have ever been and the advent of social media means that if any sporting body fails to live up to its values, it will be found out and the story will be immediately disseminated around the world. Brand promises are being tracked. Greater inclusivity rather than exclusivity is now the order of business.
8. The starting point for ensuring that sport 'plays by the rules' is clear commitments to international standards and the rule of law. Global sporting events must be planned and carried out with respect for human rights. The Universal Declaration of Human Rights (1948) is the bedrock of international human rights law. It underpins subsequent international human rights instruments and regional standards from the European Convention for the Protection of Human Rights and Fundamental Freedoms (1950) to the Commonwealth Charter (2013).
9. MSE planning, organisation and legacy is an inherently shared endeavour. It involves public, private and third sector actors, and a web of responsibility and accountability. The United Nations Guiding Principles and the ILO Declaration on Fundamental Principles and Rights at Work, alongside international standards such as the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (2011), provide the roadmap. Together they constitute the rules of the game or normative framework, which delineates not only the obligations of governments, but also the responsibilities of private actors, and the necessity of access to remedy for victims. Host governments have a clear duty to protect the human rights of their citizens. The responsibility to demonstrate respect for human rights, or to avoid causing harm, is however held more widely, including by sports bodies and companies.
10. Governments, consumers and investors are among the stakeholder groups increasingly demanding that businesses worldwide make use of the international human rights framework in guiding their activities. The sports sector is not exempt. Athletes, for example, care about how their sports are governed; they expect the sporting federations to abide by the same ILO and UN standards as any other commercial operation. In practical terms, this means carrying out human rights due diligence to predict and respond to human rights challenges. Some sports bodies are under acute pressure to recover their social license, but no organisation can afford to assume it has all the answers. Each sports governing body and sports federation needs the courage to admit mistakes. They need to be prepared to be vulnerable, to identify their weaknesses so as to learn, grow and flourish.
11. Sport's potential to affect human rights change must be harnessed. Sport cannot solve all the human rights issues that arise around MSEs alone. Systemic human rights issues within host countries cannot be ameliorated overnight, nor can longstanding power imbalances. The sports sector does however have leverage with host governments and vitally through its contractual relationships and there should be no doubt that MSEs can contribute in profound ways. They can set an example on human

rights, from the choice of host city location, to signing commercial contracts and beyond. This means recognising potential sources of harm; opening spaces for genuine dialogue with stakeholders, including with host states; and putting management, monitoring and reporting systems in place to address, and remediate, adverse human rights impacts.

Overcoming recurring human rights hurdles across MSE life-cycle

12. Over the MSE lifecycle, the human rights issues arising on a recurrent basis are often the very same challenges encountered by other industries, and certainly other sporting traditions. Whether tackling issues around land acquisition, through construction and procurement, to security, event management and legacy, no one sporting body or organising committee needs to reinvent the wheel. Lessons can be learnt from other industries, and on some issues, from previous organising committees. Approaches and guidance adopted for example by the International Finance Corporation (IFC), the OECD and European Union can be utilised and, with the right expert guidance, adapted to the needs of the sports sector. Using and building on these resources should be a key component of the legacy generated by MSEs, feeding learning and experience into future events, other locations, and indeed, other sectors and developments globally.

Land acquisition

13. Campaigners identify recurring patterns which lead to adverse human rights impacts: lack of access to information and transparency for families facing relocation; evictions made at short notice; compensation packages that are inadequate, poorly communicated, or both; resettlement plans don't properly consider questions such as security, access to schools, hospitals, transport and other supporting infrastructure; and gentrification. Are the sports governing bodies doing enough to require impact assessments and resettlement plans from the countries bidding to host, or recently awarded, MSEs? Are MSE knowledge management and transfer systems sufficiently robust? Do they capture the requisite human rights learning?
14. In Brazil, there are reports of some families having been moved to locations far from their previous employment and to areas controlled by militias. Yet due to a lack of clear information, campaigners cannot easily ascertain whether evictions were prompted by the FIFA Confederations and World Cups of 2013 and 2014, the Rio 2016 Olympics, or in fact whether local authorities have in some instances used these MSEs as justification to accelerate existing clearance plans to increase property values. One counter view was that redevelopment can of course benefit local communities and any causality between property price increases and MSEs in Brazil is unproven. Such reports are not isolated to Brazil. Other MSE host cities in both the global North and South have faced many of the same issues. The result in some instances has been that social license is compromised, with sports governing bodies reporting that they face harder challenges to build trust and confidence among communities and officials in prospective host cities with the result that a number of potential host cities and countries are questioning the integrity of resettlement plans, or withdrawing from bids to stage MSEs.
15. Opportunities exist for greater participation, and for land acquisition to more effectively enhance communities. Human rights expertise in Brazil has been credited with raising awareness and changing local authority approaches in some cases. There are also better ways to include the voices of affected individuals, for example, drawing on models from the IFC around obtaining free, prior and informed consent. More can be done to make long-term social/development needs and regeneration of the host city/country a central aim from the outset. A range of steps are possible, including bidding documentation that sets better terms for redevelopment strategies, to avoid evictions and meet rehousing targets. Due diligence mechanisms can be useful tools to monitor and hold local organising partners to account if they fail to deliver on human

rights pledges or to enforce their own legal safeguards. Several civil society-led initiatives already underway to establish key human rights objectives for the bidding process need to be properly harnessed.

Construction

16. The accelerated timescales for constructing sporting venues, hotels and the other supporting infrastructure essential for the operation of an MSE, mean these events create human rights risks, in particular for workers. Mortality and health and safety remain a challenge for the construction sector globally, and construction is increasingly diversified to include temporary event architecture or 'overlay'. Yet despite good learning coming out of London 2012, there is little coordinated effort to carry human rights lessons forward across the MSE landscape, especially into less developed countries and into temporary construction or among SMEs where experience is often limited. The majority of construction workers are usually employed by sub-contractors, sometimes seven layers deep. Sub-contracted workers often don't even know who employs them. They are often at greatest risk from accidents, other abuses, human trafficking and forced labour in MSE-related construction, from Azerbaijan and Russia, through to Japan and Qatar. Migrant workers are frequently subject to another layer of exploitation in the form of fraudulent recruitment practices in home and host countries. These are often global challenges faced by particular industries, where MSEs provide a spotlight and an opportunity for reform.
17. Awarding bodies need to exert greater direction to ensure respect for human rights across all phases of an MSE project. Major sports organisations have a responsibility to act wherever human rights impacts occur that can be linked to the event, this includes during venue construction and MSE-related infrastructure development. New provisions safeguarding people's rights therefore need to be integrated into host bidding criteria and contracts to help raise standards within host cities and countries, and to set clear expectations, especially in those countries where rights protection is known to be inadequate, poorly enforced or subject to corruption. Incentivising domestic policy reform that advances human rights is important. Public procurement is often substantial and can be a major driver for improving standards. While there is an onus on governing bodies to exert their influence, human rights risks need to be anticipated by all key stakeholders; across all industries. No amount of auditing is likely to be sufficient. Consideration needs to be given to assigning liability for compliance throughout value and supply chains to the client (eg organising committee) and main contractor. The direct hiring of construction workers and the establishment of best supplier principles may also need to be part of the solution. International standards and guidance, such as those of the UN, IFC and OECD, and best practice, including government-led initiatives like Brazil's anti-slavery 'Dirty-List', or multi-stakeholder initiatives like the Fair Factories Clearinghouse should apply. Trade unions are critical in ensuring worker engagement, and in preventing and resolving disputes before issues escalate.

Procurement and the supply chain

18. Procurement and supply-chain management from construction materials through to the manufacture of sporting goods and event merchandise are critical to any MSE. At the behest of sports governing bodies and on their own initiative, local organising committees, such as the London 2012, Glasgow 2014 and Rio 2016 Organising Committees, are demanding compliance with international labour standards through their sourcing codes. Yet major brands from construction firms through to sporting-goods manufacturers continue to face public scrutiny over adverse human rights impacts associated with MSEs, and not only those pertaining to working conditions. The limited lifespan of local organising committees and their lack of repeat business undermines efforts to raise standards across the supply base. Sports governing bodies have far greater leverage to affect long-term change. Pockets of good practice exist, such as FIFA's Quality Programme for football manufacturers, which requires compliance with the World Federation of the Sporting Goods Industry (WFSGI) Code of

Conduct before licenses are granted, but initiatives have too often been reactive or crisis-driven.

19. Concerted human rights due diligence, consolidation of learning, greater transparency, and clarity on systems of accountability are vitally important from one MSE to the next. Embedding stakeholder engagement and the needs and insights of workers and other affected individuals into supply chain management and tendering practices will be critical to success. Major MSE commercial partners, industry associations and some host governments and local organisers are leading by example. Efforts range from establishing local and regional level networks of experts that seek to build grassroots knowledge and factory capacity; to demonstrating greater transparency and encouraging accountability through factory disclosure and publishing levels of unionisation; to entering into cross-sector partnerships like the Fair Labor Association and Better Work; through to peer-to-peer learning programmes that leverage industry leaders to help better equip SMEs in meeting human rights challenges and preparing for markets of the future. The major sports governing bodies must make similar commitment to continuous improvement. Sports organisations should scale up engagement with governments and industry to foster learning and good practice, reach sustainable solutions, address complex human rights dilemmas and variations in business models and influence improved performance across the full supply-base.

Grievances and remedies

20. Access to remedy for victims of MSE-related human rights abuses is a core pillar of the United Nations Guiding Principles, as essential within the orbit of MSEs as in any industry. While remedy is no substitute for good planning and prevention, having proper procedures in place for when things go wrong is vital. Grievance mechanisms are just one of many remedial solutions and the lifecycle of MSEs demands multi-phased and multi-regional responses. Examples take many forms, encompassing those that are judicial and non-judicial and mechanisms that are State-based (eg National Human Rights Institutions), non-State-based (eg company run) or hybrids (eg OECD National Contact Points). Ideally, grievances should be resolved locally and as close to the original abuse as possible. National Human Rights Institutions or Commissions, for example, are receiving complaints, including in Qatar, from victims of human rights violations within the country in which the alleged abuse took place. Is enough being done in and around MSEs to correct power imbalances or legal obstacles that disadvantage those bringing a complaint in some host countries?
21. The year 2015 has been a landmark year in relation to MSEs and access to remedy. The OECD National Contact Points for the UK and Switzerland have accepted complaints made against Formula One and FIFA and referred the cases to mediation. For the first time, this means sports governing bodies are being assessed on the same basis as companies and therefore like companies are obliged to conduct human rights due diligence and to provide for or co-operate in remediation for victims. Complaints levelled against sports governing bodies, local organising committees or their commercial partners should not be viewed as a threat, but rather an opportunity to solve a problem. Remedy provision is complimentary to human rights due diligence, and can provide invaluable feedback on the efficacy of risk management systems. In the efforts to deliver MSEs in line with UN standards, it will be important to avoid the risk of new mechanisms being rushed through, of unnecessary duplication, and of failing to make them truly accessible to at risk groups.
22. Good practice on remedy should be consolidated. The operation of the London Organising Committee of the Olympic Games's (LOCOG) ground-breaking Complaint and Dispute Resolution Mechanism has been well-documented in London 2012's learning legacy literature. Instigated at the behest of stakeholders, LOCOG's mechanism relied on the support of a qualified expert organisation, extensive scenario planning, confidence building efforts and outreach to potential complainants. Nonetheless, challenges arose. Has enough been done to consolidate the learning

from London? Are there other models within the sports arena that could be adapted to handle human rights cases? The Tokyo Organising Committee for the Olympic Games (TOCOG) is committed to establishing its own grievance mechanism. How can TOCOG and other organising committees be best supported in the complex task of providing access to remedy in the absence of a coherent system of human rights knowledge transfer? Awarding bodies could usefully build into hosting criteria a requirement for the provision of grievance mechanisms by local organisers, which specify that such mechanisms be aligned with the UN Guiding Principles and build in stakeholder engagement.

Sponsorship and role of media partners

23. Revenues from sponsorship and the sale of broadcast rights are indispensable for the financing of MSE planning, delivery and legacy. Global sponsorship deals are sometimes signed for a decade at a time, meaning that sponsors themselves may be in the dark over which cities/countries will host that MSEs when they agree their contract. Sponsors regularly face scrutiny on human rights grounds, either based on their own performance, or because of the leverage they are believed to wield over the sports governing bodies or over host governments; such as ahead of the Beijing 2008 Olympics from the Save Darfur coalition and Free Tibet campaign and the Sochi 2014 Winter Olympics from LGBT-rights supporters. In the past, several campaigners allege they have rarely found MSE sponsors to be receptive to demands on human rights matters. Others have raised questions over the human rights or ethical credentials of the sponsors themselves, and whether it is appropriate, for example, to market certain products to young children. Should sports bodies be carrying out human rights due diligence on their sponsors and visa-versa?
24. During 2015 a number of FIFA Partners have publicly called for major governance reform of soccer's governing body. Is it realistic however to expect sponsors to pull the plug on MSE contracts on human rights grounds, especially when other commercial rivals, with potentially less interest in social matters, are waiting in the wings? Sponsors and MSE commercial partners however have a strong vested interest in protecting sport's major brands, and some are already advocating for major human rights reforms, including throwing their weight behind the idea of an impartial space of learning and accountability. Several sponsors, including International Olympic Committee (IOC) and FIFA sponsors, have specifically called for reformed host city bidding processes, which, for example, make full use of ILO and the United Nations Office of the High Commissioner for Human Rights (OHCHR) mechanisms to shortlist, or make human rights recommendations to selected host governments; and for consolidation on good practice, including capitalising on the experience of the watchdog Commission for a Sustainable London 2012 and existing remediation models like those of LOCOG and the OECD National Contact Points. New models must be realistic, and should be tried and tested. Time however is also of the essence. Implementation of human rights-related reform cannot wait for revisions to criteria for future MSE-host bidding rounds. New approaches must also address pressing human rights dilemmas within the MSE host cities and countries already selected, from Russia in 2018 through to Beijing and Qatar in 2022.

The event

25. A wide range of human rights related harms resurface in the lead up to and during the events themselves. They range from concerns over improper community policing; to the mistreatment of protestors (infringements to freedom of expression and the right to peaceful assembly); to the clearance of homeless adults and children from the vicinity of MSE venues; to failures to safeguard the rights of fans and athletes (especially young athletes) from harassment or racial/homophobic abuse; as well as the sexual exploitation of minors, and disruptions to the livelihoods of small businesses and street-vendors, and to children's schooling.
26. In relation to Rio 2016, human security is one issue where there remains room for

further work over coming months, given the long-standing risks endemic in policing in Brazil. The security question is made more complex still when recent terrorist attacks are considered, such as that against the Stade de France in Paris. Public security is also a human rights question, essentially in relation to the right to life, and this needs to be balanced against safeguards to maintain due process and guard against the excess use of force or discrimination. The private sector, and in particular extractive companies and other stakeholders, have considerable experience to bring forward here in relation to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers.

27. The care of athletes themselves is also critical for obvious reasons. Athletes have sometimes themselves been the targets of terrorist attacks at mega-sporting events. Some athletes, those under the age of 18, are also children themselves and so child protection issues are relevant. Once these protections are established, athletes can be best ambassadors for sport and human rights, helping to shift public attitudes to disability or different forms of discrimination.

Passing the baton: integrating human rights and legacy, learning and accountability

28. With very few exceptions, major global sporting events have been associated with serious violations of international labour standards and human rights, despite two decades of international attention to the issue. MSEs need to leave a lasting positive human rights legacy across sport and industry in general and upon hosting countries. The IOC's 'Olympic Agenda 2020' includes in-principle commitments on the issue. FIFA and the Commonwealth Games Federation have also made human rights pledges. No mechanism exists, however, to bring the aspirations from sport's peak governing bodies into reality. Sport is about excellence and winning, but little sporting success is accomplished in isolation. Teamwork and partnership are essential.
29. A growing number of actors acknowledge that more effective strategies are needed to prevent, mitigate and remedy abuses of labour standards and human rights associated with the life-cycle of mega-sporting events: from bidding rounds through to legacy. New coordinated efforts to provide expert advice and practical guidance aimed at overcoming the current lack of effective knowledge transfer and exchange of good practice that currently exists on social issues could make a valuable contribution to addressing such concerns. We need to end the 'Groundhog Day' cycle of recurring patterns of human rights violations linked to MSEs and the failure to pass knowledge on from one country to the next and across sporting traditions.
30. Any strategy in this area should be based on existing international standards and procedures and draw on information and intelligence brought to the table by civil society, trade unions and other experts able to support enhanced due diligence processes undertaken by sports bodies, local organisers and commercial partners. Equally important, ensuring greater accountability for how decisions are made and implemented both before and after host cities/countries have been chosen by sports bodies, is a critical challenge requiring further action.
31. 2016 needs to be a year for evidence-based approaches to demonstrate what collective work might add real value to move past the status quo of recent years. Such testing is essential to the success of an impartial centre for learning and accountability that several speakers proposed during the meeting. A variety of stakeholders have suggested possible ideas for initiatives to be trialled in the year ahead. Many have welcomed IHRB's offer to serve as the 'midwife' to such a process. Ideas on the table include initiatives on:
 - Embedding human rights procedures in host cities using the ILO supervisory mechanisms and other UN human rights review processes
 - Human rights due diligence for host cities

- Procurement and supply chain compliance, going beyond tier 1
- Framework for supporting locally driven grievance mechanisms for all MSEs
- Specific due diligence for forced trafficking and child rights
- Responsibilities of sponsors and broadcasters
- Migrant workers in construction and third party recruiters
- Gender rights
- Human security and issue of policing
- Facilitating stakeholder engagement

Conclusion

32. There seemed to be a consensus over the two days that whilst better information exchange between sporting traditions, venues and other stakeholders would serve a valuable purpose, it would not be sufficient on its own to rebuild trust in the eyes of society. Accountability is also essential. The question is what different pre-emptive (due diligence based) and remedial (grievance or mediation-based) approaches might look like in practice. There was recognition that the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work provided the standards required for governments and businesses alike. The question is how these might be applied concretely in practice. Many of those attending expressed an interest in working together during 2016 to show what this additional element might look like. One of the key challenges for those involved will be to balance the urgency of the moment, expressed in particular from civil society, trade union and some sponsors, with the need to take concrete steps that build confidence and trust. IHRB offered to continue to play the role of 'midwife' during 2016 and to reconvene all actors in a year's time when the evidence of different pilots could be shared and assessed. A steering group will be established at the start of 2016 to guide the process.

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