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Civil + Human Rights and Equity Department

Response to the LA28 Human Rights Strategy

Los Angeles 2028 Olympic and Paralympic Games

For decades the Los Angeles Human Relations Commission (HRC) has served as an important bridge during times of friction by convening diverse voices, alleviating intergroup tension, and transforming conflict into constructive collaboration. It is in this attitude of shared purpose that the Commission offers this response to the December 2025 LA28 Human Rights Strategy. We deeply appreciate the stakeholder consultation undertaken to fulfill this historic International Olympic Committee requirement. Rather than simply offering critique, the following document is meant to support LA28 by identifying key operational gaps, leveraging the HRC's institutional capacity and decades of community trust to help LA28 close those gaps successfully. To ensure maximum clarity and utility, the following commentary addresses each priority area in turn, followed by overarching, cross-cutting concerns.

1. General Framework and Regulatory Alignment

The LA28 Human Rights Strategy ("the Strategy") references the IOC, the International Paralympic Committee (IPC), and federal, state, and local regulatory frameworks throughout. The Strategy draws on multiple overlapping standards but does not describe how they will be operationalized in a coordinated way, or how the commitments it articulates will translate into consistent practice across the many entities involved in delivering the Games.

Recommendation: The Commission recommends that the Strategy incorporate a clear implementation protocol and governance structure — defining how its human rights commitments will be applied in practice, which entities hold responsibility for carrying them out, and how the Strategy's standards will be coordinated consistently across the full range of Games operations and partners.

2. Human Trafficking and Labor Rights

The Commission commends the Strategy's treatment of human trafficking and labor rights, which are rightly a primary area of concern.

a. Enforcement Framing and Survivor-Centered Reporting

The anti-trafficking section is built almost entirely on a law-enforcement architecture. While law-enforcement are important partners, survivors of trafficking, and especially undocumented survivors, frequently avoid law-enforcement-led reporting channels out of fear of detention, deportation, or retaliation. Survivors are far more likely to come forward through a trusted, non-enforcement intake point that connects them to services first[1][2].

Recommendation: The Commission recommends that the Strategy establish, or formally designate, a trusted non-enforcement intake point for trafficking and exploitation concerns to serve as a confidential, multilingual, survivor-centered channel that connects individuals to services first and is firewalled from immigration and other enforcement use

Recommendation: The Commission requests that the Strategy, in consultation with community-based organizations, adopt safeguards to protect against profiling, sweeps, or displacement of sex workers in the name of trafficking prevention.

b. Immigration Enforcement and Federal Law Enforcement Presence

The human trafficking section of the Strategy includes the document's only mention of California's "significant immigrant population." The Strategy should address how federal presence will interact with the City's sanctuary policies, and outline protocols protecting residents, workers, vendors, athletes, or spectators from immigration enforcement activity in connection with the Games operations.

Recommendation: At minimum, the Strategy should affirm the City's sanctuary commitments and specify whether Games security infrastructure will be used to facilitate civil immigration enforcement.

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[1] Polaris Project. (n.d.). *National Survivor Study findings and resources*. https://polarisproject.org/national-survivor-study-findings-and-resources/

[2] Safe House Project. (2025, August). *Trauma-informed admission & intake processes: Best practices for human trafficking recovery programs*. https://www.safehouseproject.org/wp-content/uploads/2025/08/Trauma-Informed-Admission-Intake-Processes-Best-Practices-for-Human-Trafficking-Recovery-Programs.pdf

3. *Accessibility*

The Commission commends the Strategy's substantive treatment of accessibility, which is appropriately identified as a core priority. The Commission particularly notes and applauds that the Strategy reaches beyond physical and mobility access to address developmental and sensory access. This is a genuine strength and a model worth expanding.

The Commission also recognizes that the City's Department on Disability has already provided accessibility recommendations to LA28, and that the Commission on Disability is actively engaged in discussions regarding accessibility and transportation for the Games. The Human Relations Commission supports and seeks to complement that work.

Recommendation: The Commission recommends structured venue site visits with people with lived experience and disability advocates, conducted during the pre-Games preparation window, to drive real-time improvements before competition.

4. *Unhoused Communities*

The Commission raises the following concerns not to hinder, but to partner with LA28 on an issue that holds immense significance within the Los Angeles community. The Commission also stands ready to support and coordinate with the City Council Committee on Housing and Homelessness and the Los Angeles Homeless Services Authority (LAHSA) to align these efforts with the work already underway.

The Strategy states that relocation of unhoused individuals will occur only "if the need arises" due to safety requirements, and that LA28 will notify stakeholders with "as much advance notice as practicable."

- This framing does not account for the well-documented historical reality that major sporting events have been and continue to be accompanied by the displacement of unhoused communities[3][4]. The Commission requests a clear accounting of whether any such relocations have already occurred in anticipation of the Games, and whether required stakeholder notifications have been issued.

- The temporal scope of the "if the need arises" provision is undefined. The Commission requests clarification regarding when these obligations begin and end, including whether pre-Games planning activities, security perimeter establishment, venue preparation, or other operational measures would trigger them.

- While the IOC does not explicitly require the removal of unhoused individuals from areas surrounding Games venues, the Commission is concerned that security and safety

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[3] Ludvigsen, J. L., & Byrne, S. (2024). In the shadow of sport mega-events: A critical analysis of the nexus between evictions, displacements, securitized gentrification and children's rights. *International Review for the Sociology of Sport*, *60*(1), 1–19. https://doi.org/10.1177/10126902241276258

[4] Healey, P. (2009). The civic capacity of looking ahead. *Planning Theory & Practice*, *10*(4), 439–457. https://doi.org/10.1080/14649350903229828

perimeter policies could have the unintended effect of displacement. The Commission requests clarification on the safeguards that will be implemented to prevent or mitigate such outcomes.

- The Strategy references the "We Are LA" housing stability program but does not describe how it will be operationalized in this context. The Commission recommends supplementing the Strategy with a concrete plan describing how housing stability, outreach, and supportive services will be deployed to address potential Games-related displacement risks.

Recommendation: The Commission recommends inclusive engagement of homeless outreach providers, homeless-services agencies, and people with lived experience of homelessness in advance of venue-preparation decisions, so that any displacement risk is identified and mitigated before it occurs.

Recommendation: The Commission encourages LA28 to design clear access, programming, volunteer, and employment pathways that position unhoused Angelenos as participants in and beneficiaries of the Games.

5. Civil Rights, Voice, and Community Engagement

a. Diversity and Inclusion as Protective Factors

Safeguarding human rights is not solely a matter of responding to abuses after they occur; it is also a matter of cultivating the conditions that prevent them. The City of Los Angeles has proven vehicles for this work. The Commission recommends that the Strategy expressly leverage:

- **Civil Rights messaging through the “LA For All” / "LA is For Everyone" campaign**, the Civil + Human Rights and Equity Department's award-winning, multilingual anti-hate and hate-crime-prevention campaign shares concrete tools for reporting hate while also celebrating the diversity that defines Los Angeles.
- **The Cultural Olympiad** as a platform to uplift human rights and center Los Angeles's ethnic, cultural, and artistic diversity. Our communities are hosts and cultural leaders, not merely spectators or subjects of security planning.
- **Youth engagement** as a gateway to broader community buy-in. LA28 should develop targeted programming that creates real pathways for youth to participate as spectators, volunteers, and employed workers. The impact of youth inclusion is deeply communal: when one child sings the national anthem, an entire community becomes engaged; when thousands of children participate, that sense of shared ownership and civic pride grows exponentially.

Recommendation: The Commission invites LA28 to affirm human rights protections by including a standalone section in their Strategy on discrimination, diversity, and inclusion. The Commission offers its assistance in crafting language that is both principled and durable, affirming Los Angeles's inclusive values in terms that can withstand shifting political conditions.

b. Communications and Community Narrative

The Commission is mindful of current public sentiment in Los Angeles regarding the Games. Meaningful community concern exists around readiness, equitable access, and whether the Games will reflect and celebrate the city's full diversity. Left unaddressed, this sentiment risks alienating the very Angelenos whose engagement is essential to the success of the Games.

Recommendation: The Commission recommends that LA28 develop a robust, proactive communications strategy that addresses:

- **Fostering civic pride, particularly in communities that may feel excluded or skeptical. That opportunity must be deliberately cultivated, not assumed.**
- **Clear, timely, and accessible community notification processes for temporary changes — road closures, security perimeters, venue impacts — with particular attention to non-English-speaking communities.**

c. Free Speech

The Commission supports LA28's proposed use of free speech zones and is glad to assist in shaping their design and operation. However, the Commission seeks clarity on the following:

- The Strategy does not specify what will occur if individuals exercise constitutionally protected speech outside of designated free speech zones. The Strategy states that the LAPD will permit speech, but does not explain how this commitment interacts with safety perimeters and NSSE security protocols. This ambiguity must be resolved before the Games time.
- Throughout the Strategy, references are made to community input opportunities, but unlike sections that provide hotline numbers and formal redress channels, no contact information or mechanism is provided for residents to submit ongoing input to LA28 on Games planning. The Commission recommends that this be remedied immediately.

Recommendation: Drawing on its core mandate to reduce intergroup tension and prevent civil unrest, the Commission is prepared to help in the following ways:

- **Convening community organizations and advocates to provide input on siting and designing free speech zones at key venues, so that they safeguard the safety, security, and constitutional rights of both those protesting and those participating in the Games.**
- **Advising on the use of trained, community-based responders who can serve as neutral liaisons among demonstrators, organizers, and security personnel, and help identify and de-escalate tensions before they become conflicts, an approach rooted in trauma-informed and conflict-resolution best practice.**

d. Civil Rights Enforcement and Remedy

The Strategy should explicitly name the Civil Rights Enforcement program (within the Civil + Human Rights and Equity Department) as the City's mechanism for enforcing its Civil and Human Rights Law. This program provides an administrative pathway to remedy discrimination in employment, housing, commerce, and education, making it an indispensable resource for an event drawing millions of visitors and workers

Recommendation: The Strategy should expressly incorporate the Civil Rights Enforcement program as a remedy mechanism for Games-related discrimination, publicize how to reach it in accessible and multilingual formats, and connect it to the unified reporting architecture.

6. *Public Safety and Policing*

The Human Relations Commission recognizes that public safety planning is a critical component of Games operations. The Commission believes that several aspects of the Strategy would benefit from additional detail, clarification, and safeguards to ensure that security measures are implemented in a manner consistent with civil and human rights principles.

a. Pretextual Stops

Security perimeters at major sporting events have historically been accompanied by preemptive and pretextual police stops. The Commission has direct and relevant institutional history on this issue[5], and the evidentiary record is clear: pretextual stops do not improve safety outcomes, disproportionately impact Black and Brown communities (multiple Games venues are located in or adjacent to these communities), undermine public trust, and divert officers from more effective crime-reduction strategies[67]. The Commission commends the Los Angeles City Council's ban on pretextual stops by the LAPD[8] and urges neighboring law enforcement entities to adopt identical safeguards.

Recommendation: LA28 and public safety partners should identify clear standards, accountability mechanisms, and data collection practices to ensure that Games-related security activities are implemented equitably and without discriminatory impact.

b. Crowd Control Policies

Recommendation: the Commission recommends a review of law-enforcement crowd management training, protocols, and accountability measures to ensure they reflect

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[5] Los Angeles Civil + Human Rights and Equity Department, Human Relations Commission. (2025, March). *2024 Young Adult Dinner Dialogue (YADD) report*. City of Los Angeles. https://civilandhumanrights.lacity.gov/sites/g/files/wph2271/files/2025-03/2024%20YADD%20Report%20%28Approved%20Final%20Version%29.pdf

[6] Hannon, L., Redditt, L., & Cordes, B. (2024). Curbing pretextual traffic stops to reduce racial profiling. In K. M. Budd, H. E. Dillaway, D. C. Lane, G. M. Muschert, M. Nair, & J. A. Smith (Eds.), *Agenda for social justice 3: Solutions for 2024* (pp. 10–18). Policy Press. https://bristoluniversitypressdigital.com/edcollchap/book/9781447371410/ch002.xml

[7] Petersen, K., Weisburd, D., Fay, S., Eggins, E., & Mazerolle, L. (2023). Police stops to reduce crime: A systematic review and meta-analysis. *Campbell Systematic Reviews*, *19*(1), Article e1302. https://doi.org/10.1002/cl2.1302

[8] Los Angeles City Council. (2026, May 6). *Amending motion: Traffic Enforcement Alternatives Project* (Item No. 5C, Council File No. 20-0875). https://cityclerk.lacity.org/onlinedocs/2020/20-0875_misc_5C%20Amd%20Motion_TBM-MHD--Hutt_5-6-26.doc.pdf

current best practices, protect constitutional rights, and promote public confidence in Games-related operations.

c. Safety Perimeter Parameters

The Strategy does not define the size or scope of safety perimeters or rings around Games venues. The Commission recognizes that perimeter and security decisions for a NSSE are made through a unified command involving federal, state, and local agencies, and that authority over these decisions is shared and, in significant respects, federally led.

Recommendation: Given the location of many venues in densely populated residential and commercial neighborhoods, the Commission requests that LA28 disclose, to the extent permissible, available perimeter parameters and support an analysis of their anticipated impact on residents, businesses, and mobility in surrounding communities, viewed through a human rights lens. The Commission further encourages LA28 to advocate for these community impacts to be weighed in perimeter planning, and stands ready to help surface and communicate those community concerns.

d. Predictive Policing and Surveillance Technologies

The Strategy is silent on the technological dimension of Games security. A NSSE of this scale typically brings a dramatic expansion of surveillance infrastructure, which intersects with nearly every other civil and human rights concern addressed in this document– not only for athletes but for all communities. The Commission recognizes that a substantial portion of this infrastructure may be operated by federal agencies under federal authority, which can limit the City's and LA28's direct control and visibility. With that reality in mind, the Commission recommends that the Strategy:

- Disclose, to the extent permissible, what surveillance and predictive-policing technologies will be deployed in connection with the Games and by which agencies.
- Encourage clear data-governance practices — including transparency around data collection, retention, sharing, and deletion — and advocate, within the limits of its authority, for safeguards that protect community members and maintain the confidentiality and trust necessary for vulnerable residents to participate in the Games without fear.
- Support clear transparency and accountability measures consistent with the appropriate jurisdictional authority, including independent audit, public reporting, and a clearly identified pathway for individuals to raise and seek resolution of surveillance-related concerns.

Recommendation: The Commission is prepared to help convene technologists, civil-liberties advocates, and affected communities to inform these safeguards and to help LA28 communicate community concerns to its security partners.

7. Athlete Safeguarding

The Commission acknowledges the IOC and IPC frameworks for athlete safeguarding and the use of artificial intelligence tools to identify abusive online messages directed at athletes and their families. The Commission recommends that LA28's legal counsel review the following areas:

- Liability exposure arising from the plan to accredit Safeguarding and Welfare Officers who may refer athletes to mental health services, given that referral without appropriate clinical oversight or follow-through protocols may create legal risk.
- Privacy implications of AI-based monitoring of communications of athletes and their families, including compliance with California privacy law and international data protection standards applicable to athletes traveling from other jurisdictions.
- The Strategy does not currently address the safety and wellbeing of athletes from countries engaged in active geopolitical conflict. Geopolitical tensions among visiting nations may also surface among spectators and diaspora communities, creating intergroup-conflict and public-safety risks that extend beyond the athletes themselves.

8. Cross-Cutting Observations

The Commission identifies the following additional concerns that cut across multiple sections of the Strategy:

a. Discrimination, Race, and Religious Minorities

The Commission has real concerns about the treatment of race and ethnicity in the Strategy.

- It is unfortunate that the only substantive discussion of Black and Latino communities in this document appears within a crime prevention context — specifically, in language about "policing in partnership with key communities, including African Americans, Latinos, and other Angelenos, to increase cooperation and reduce violence." This framing does not reflect the role these communities play in the life of Los Angeles or in the success of the Games. Black and Brown Angelenos are residents, workers, business owners, athletes, spectators, volunteers, cultural leaders, and hosts.

Recommendation: the Strategy must more fully recognize these communities as partners and beneficiaries of the Games, rather than referencing them primarily through a public safety lens.

- With a well-documented increase in hate crimes against religious communities in Los Angeles and nationally, the Strategy has an opportunity to explicitly uplift religious tolerance and pluralism. The Games will bring elevated hate crime risk, particularly against Jewish, Muslim, Sikh, and other religious minority communities. The Strategy should address this explicitly, including prevention measures and enhanced victim support resources.
- Data shows that the Black community is disproportionately impacted by hate crimes in L.A. county, accounting for 50% of documented hate crimes despite comprising only 9% of the city's population. An explicit hate crime prevention and response strategy, including community-specific resources, should be added to the Strategy.

Recommendation: A review and utilization of the LA vs Hate program, which provides 24/7, confidential, multilingual reporting of hate incidents and hate crimes. 211 LA's Care Coordination team follows up with survivors to connect them to mental health services,

legal support, advocacy, and community-based resources.

b. Inclusion & Intersectional Populations

The Strategy addresses several vulnerable populations — unhoused individuals, people with disabilities, LGBTQIA+ communities, youth — largely in separate silos. The Commission encourages LA28 to consider intersectionality explicitly: unhoused LGBTQIA+ youth, elderly immigrants with limited English, or foster youth with disabilities face compounded vulnerabilities that single-axis analysis may miss. Equitable and inclusive participation should reach all Angelenos and allow them to meaningfully participate in and benefit from the Games. To advance this effort, the Commission can act as an advisor regarding gender, socioeconomic, and youth inclusion, and offers the following recommendations:

Recommendation: The Commission recommends measurable goals in the following areas:

- **Gender accessibility, including equitable restroom access and gender-neutral facilities.**
- **Socioeconomic accessibility, including affordable or tiered ticketing structures and transportation subsidies for low-income residents.**
- **Youth access, particularly for system-involved youth such as foster and transition-age youth — for example, measurable benchmarks for what percentage of Games tickets or employment opportunities will be made accessible to foster youth or other vulnerable youth populations.**

Recommendation: Inclusion is incomplete without language access, especially in Los Angeles County, where more than 200 languages are spoken and millions of residents have limited English proficiency. The Commission recommends that the Strategy adopt a defined language-justice standard applied uniformly across every public-facing function, including:

- **A set of threshold languages tied to local demographics**
- **American Sign Language interpretation**
- **Plain-language and accessible-format versions of all materials**

c. Health, Heat, and Climate Equity

The human rights burden of extreme heat and poor air quality falls hardest on unhoused residents, older adults, people with disabilities and chronic illness, outdoor workers, and low-income households without reliable air conditioning. The Commission recommends that the Strategy incorporate a health, heat, and climate-resilience plan grounded in a right-to-health framework.

Recommendation: The Commission can convene experts to address these issues and concerns (e.g. cooling access and shade, air-quality monitoring and contingency protocols, protections for outdoor workers and volunteers, and more) from a health equity perspective.

d. Grievance, Reporting and Remedy Mechanisms

Elevating human rights concerns and addressing risks preemptively is essential, but a credible human rights strategy must also include mechanisms for reporting and remedy.

The Commission seeks clarity on the following:

- The Strategy refers to "the LA28 reporting hotline" yet also points to numerous external hotlines. It is not clear whether one number triages across all issue areas, or if reportees must self-diagnose their concern and locate the correct external line. A countywide partnership with an established local intake-and-referral infrastructure, such as 211 LA (as modeled in the 2026 World Cup human rights partnership), offers a proven vehicle for this approach.
- The Strategy's "Assessment of Progress" section frames hotline reports chiefly as inputs to LA28's own monitoring. The Commission asks whether the same line is intended to serve residents, workers, vendors, spectators, and unhoused community members — and if so, how that public-facing purpose will be communicated, staffed, and resourced differently from an internal compliance function.
- The Strategy commits to follow-up and to referrals but does not describe intake standards, response timelines, case management, language access, confidentiality and anti-retaliation protections, or how a reporter learns the outcome of their complaint. A hotline that intakes concerns without a defined path to resolution risks becoming a record-keeping mechanism rather than a remedy.

Recommendation: The Commission recommends that LA28 move from a monitoring-oriented hotline to a survivor-centered, trauma-informed reporting and remedy system with a clear path to resolution. This could be achieved by strengthening and connecting existing hotlines thereby establishing a single, well-publicized point of entry that intakes all Games-related concerns and routes them to appropriate services.

Recommendation: The Commission encourages LA28 to ensure that survivors and reporters from vulnerable communities — including immigrant and undocumented residents, workers, and vendors — can report wage theft, trafficking, abuse, or other harms through a confidential, trusted channel, with the protections necessary so that the act of reporting does not itself expose them to risk. The populations most likely to be harmed are often the least likely to report, and a trusted, non-enforcement intake point is essential to closing that gap.

e. Legacy and Accountability

The Strategy's closing section commits to post-Games monitoring and review. The Commission recommends strengthening this commitment in three ways.

- First, collection and reporting of outcomes disaggregated by race, ethnicity, disability, language, age, and geography; establishment of baseline measures against which progress can be assessed; commitment to specific timelines and metrics; and incorporation of an independent evaluation framework with an independent oversight role for bodies such as this Commission.
- Second, the Commission urges LA28 to treat the 2026 FIFA World Cup as a live pilot.

The City Commission is prepared to lead a structured human rights lessons-learned review of the World Cup response and to feed those findings directly into LA28 planning.

- The Commission further encourages LA28 to formalize a commitment to its own human rights legacy via a public, post-Games accounting of risks encountered, mitigations applied, complaints received and resolved, and outcomes by focus areas. A formalized report-back would position Los Angeles as a model for future hosts and convert the Strategy's closing aspirations into a durable accountability practice.

The Commission looks forward to continued engagement with LA28 and City partners as the Strategy is implemented, refined, and made operational in the months ahead.