



Australian Government
Sport Integrity Australia



SPORT INTEGRITY
AUSTRALIA

Impact Analysis

Safety In Sport

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Key Terms

ACIC Australian Criminal Intelligence Commission

AFP Australian Federal Police

ASADA Australian Sports Anti-Doping Authority

ASC Australian Sports Commission

ASF Australian Sports Foundation

ASWS Australian Sports Wagering Scheme

CEO Chief Executive Officer

INTERPOL International Criminal Police Organisation

NADO National Anti-Doping Organisation

NIF National Integrity Framework

NSO National Sporting Organisation

NSOD National Sporting Organisations for people with Disability

ORADO Oceania Regional Anti-Doping Organisation

SSO State Sporting Organisation

UNESCO The United Nations Educational, Scientific and Cultural Organisation

UNODC United Nations Office on Drugs and Crime

WADA World Anti-Doping Agency

Executive summary

A love of sport is quintessentially Australian. As a nation we take great pride and inspiration from participating in sport as an athlete, a volunteer or administrator. We marvel at the exploits of our greatest athletes and unify as a nation to support them.

Sport is widely regarded as a core component of social inclusion in Australian communities through “its ability to provide ‘an excellent hook’ for engaging people who may be suffering from disadvantage and a supportive environment to encourage and assist those individuals in their social development, learning and in making a connection through related programs and services” (Skinner, Zakus & Cowell, 2008). As Australia’s leading demographer Bernard Salt (2012) says, sport “delivers social inclusion and, importantly, social resilience. It builds connectivity in society”.

Unfortunately, there is a dark side to sport and it is not always a safe place for all of us.

Options presented in this assessment address critical capability gaps in the current system to ensure that all cohorts in society can access Sport Integrity Australia’s services. The options would provide both enhanced and diversified capabilities to ensure that sport is safe for all, with focused initiatives for women and girls, First Nations people, children, and people from culturally and linguistically diverse (CALD) backgrounds.

The FIFA Women’s World Cup (WWC) and other international events on the ‘Green and Gold runway’ culminating with the 2032 Brisbane Olympics/Paralympics will ignite Australia’s interest in sport. These events coupled with specific infrastructure and participation initiatives will increase the uptake of sport. Too often those who enter sport leave or find the experience to be unsafe or not inclusive – there is a 30% drop-out rate from children in organised sport aged between 9 and 19¹. The options would support wide reaching cultural change within sport to ensure that those who engage in sport over the next decade and beyond remain safe and feel included.

The culture of Australian sport needs to change at all levels, not just high-performance programs and national competitions. Change is needed from the CEO to the coach, from the elite athlete to the casual participant, through to community sport and grassroots Volunteers.

Sport Integrity Australia plays an important, trusted coordination role for complaints. Sport Integrity Australia can receive information that relates to Child Safeguarding or Discrimination in sport. Complaints received will be evaluated and either managed by Sport Integrity Australia, referred on to an appropriate external agency or passed back to the complainant with suggested pathways for them to pursue. The Safe Sport Hotline is part of an expanded service offered to members of sport to share their story with a trusted member of the Sport Integrity Australia team about integrity issues they have experienced. The service includes an anonymous reporting capability that covers wider racial and cultural issues in sport for people who feel they have been discriminated against in their sport.

Since establishing the independent complaints handling model in 2021, and Safe Sport hotline in 2023, Sport Integrity Australia has received over 1,200 complaints with continued growth occurring as awareness grows and understanding of what child safeguarding and discrimination is in sport. More than half of complaints investigated concern alleged prohibited conduct against women or girls. Child Safeguarding concerns accounted for 80% of these matters, with discrimination making up the rest.

Each proposed option funds a staffing capability to ensure effective information coordination and triage of complaints and reports (discussed in detail in the section ‘Where we are’), with participant wellbeing and a trauma-informed approach at the forefront. This process would be supported by implementation of a new case management system which will ensure an effective and efficient way of handling cases and sensitive information from end to end (discussed in detail in the section ‘Where we need to be’). Each option funds development of contemporary and culturally diverse education resources, delivered through innovative methods and the latest technology, removing any cultural and multinational barriers, meeting accessible design standards, and ensuring reach across all cohorts.

To further support integrity managers currently embedded within National Sporting Organisations (NSOs) and National Sporting Organisations for People with a Disability (NSODs) to ensure safe sport policies and practices are implemented at the community level, where the impact is the greatest and most complaints derive from, Safety In Sport seeks to extend this resource to state/territory sports associations.

Proposed options aim to enhance online safety, complaint management practices and human rights in sport and ensure agency policies and products are well informed through development and implementation of a strategy to share specialist skillsets from law enforcement, the eSafety Commissioner and AHRC through consultation, partnership, information sharing capability or secondment arrangements.

¹ AusPlay_national population tracking survey.

They also provide an initiative to empower the voice of women and girls in sport through dedicated leadership and placement programs and a First Nations skills program to address disparities in participation and administration across sport. Through partnerships with Australian universities, Safety In Sport seeks to establish the Sport Integrity Research Institute, providing contemporary, athlete focused, evidence-based research to inform agency strategy and address and prevent integrity threats across an ever-evolving threat landscape.

The options would fund national and international partnerships to share information and combat abuse and safe sport issues in-person and online. It also includes an uplift in legal expertise and a new strategic intelligence capability.

Increased investment provides opportunity for Sport Integrity Australia to continue to develop partnerships to build a contemporary view of evolving issues in sport, such as concussion, para classification (intentional misrepresentation), esports and transgender inclusion, to shape nationally consistent policy, assess the threats to integrity and provide advice and referrals to experts where required.

Background and current setting

Expanding remit and diversification

The below narrative outlines the evolution of Sport Integrity Australia to its current setting, with a view of where the presented options seek to position Sport Integrity Australia for the future.

Where we were

Australian Sports Anti-Doping Authority, (ASADA) and Australia's National Anti-Doping Organisation (NADO) established by the *Australian Sports Anti-Doping Authority Act 2006* 2006-2020

ASADA was established in 2006 and combined advocacy, education, and sample collection with the then, new functions, of investigations, presenting cases at hearings, sanction recommendation and the development, approval and monitoring of sporting organisations' anti-doping policies. ASADA was a Signatory to the World Anti-Doping Code. Operating outside of ASADA during this time, were other government priorities including wagering and match fixing, safeguarding and member protection

For many years the integrity of sport has been under threat internationally, in particular through doping scandals and competition manipulation. In a fast changing, ever-evolving Australian sporting environment which is being impacted by online and technological progress, globalization of competitions and massive incentives to perform, sport is being bombarded by unprecedented challenges from many directions. The pressure to succeed at younger ages from parents, coaches and sporting clubs and an unhealthy fear of failure is resulting in a 'win at all costs', 'whatever it takes' attitude that has enveloped modern sport at all levels and has led to some recent prominent integrity issues.

In 2017, under the responsibility of the Minister for Sport, work was undertaken to develop a National Sport Plan to provide a system-wide examination of sport in Australia to strategically position it into the future. This was to be delivered around four key, interrelated pillars of participation, performance, prevention through physical activity, and integrity. The integrity pillar would support continued vigilance on protecting Australian sport from threats including doping, competition manipulation and illicit drugs.

On 5 August 2017, the then Minister for Sport, the Hon. Greg Hunt MP, announced a review of Australia's sports integrity arrangements to be led by the Hon. James Wood AO QC. The Wood Review was part of the development of the National Sport Plan – Sport 2030. The Minister for Sport, Senator the Hon. Bridget McKenzie publicly released the report on 1 August 2018.

The Wood Review was commissioned in response to the growing global threat to the integrity of sport. Recognising a fair, safe, and strong sport sector, free from corruption, is inherently valuable to sports participants, sporting organisations and the 14 million Australians who participate in sport annually. It was presented to government in March 2018 and addressed key domestic and international threats to the integrity of sport, making 52 recommendations across 5 key themes:

- A stronger national response to match-fixing
- Australian Sports Wagering Scheme
- Enhancing Australia's anti-doping capability
- A National Sports Tribunal

- A National Sports Integrity Commission (Sport Integrity Australia)

The Wood Review found the vulnerability of Australian sport to future corruption was exacerbated by the lack of a clear and national regulatory, law enforcement, policy, and program delivery response across the sports integrity threat continuum.

Where we are

Figure 1. Where we are



Sport Integrity Australia commenced operating in July 2020 and is the Australian Government agency responsible for coordinating a national response to address sport integrity issues.

3 YEARS ON

Our role

Keep sport **safe and fair** at all levels from National Sporting Organisations and National Sporting Organisations for People with Disability to grassroots clubs.

We do this by:

- promoting positive behaviour and
- addressing threats to the integrity of Australian sports.



Keeping children and young people safe in sport is one of our top priorities, along with protecting the health and welfare of all participants.

National Integrity Framework

In **March 2021**, we introduced the National Integrity Framework (NIF), a consistent set of policies and standards outlining peoples' rights and responsibilities in sport.

We have...



supported more than 100 NSOs in developing and adopting best practice integrity policies



supported 19 National Integrity Managers (employed by NSOs) who are working across 30 sports and **7 Integrity Support Officers** (employed by the Agency) who are working across 25 sports



developed toolkits, guides, resources and training to support sports implement the NIF



invested \$2 million to support the NIM Network with training and resources



invested \$4 million directly into NSOs to employ National Integrity Managers to help embed the NIF into all levels of sport

Introduced in **June 2023** to support the NIF, the **Safeguarding in Sport Continuous Improvement Program** provides sports with

education,
training,
& **ongoing support**
to help them provide **safe and inclusive environments** for their members.



Anti-doping

We deliver an **innovative and informed Anti-Doping Testing program** for Australian sport, which is **compliant with the World Anti-Doping Code and International Standards.**

We developed and rolled out the **Australian National Anti-Doping Policy** to **more than 100 NSOs** to comply with the 2021 World Anti Doping Code.

4,671
samples

collected in 2022 (cal. year)



with

46 positive tests
+ **policy reform**

Positive tests from **supplements** fell from 17 athletes in 2017, to **zero** in 2022 through education and awareness



Education and media

300 Clean Sport Education Experts attended the **World Anti-Doping Agency Global Education Conference** hosted by the agency in Sydney in 2022.

In 3 years, we have **educated almost 300,000 people** and **developed more than 100 education resources**



Play by the Rules education courses **reach more than 40,000 annually** with a distribution network close to 200,000 people in community sport

3,880 mentions of Sport Integrity Australia in the media over the last 12 months with **a potential reach of 151,182,480 people**



Play by the Rules **Start to Talk** campaign in June/July 2023 resulted in:

- **30,438 broadcasts** of the radio community service announcements.
- **10,329 broadcasts** of the TV community service announcements (minimum).
- **27 radio interviews.**
- Estimated minimum airtime value **\$1,146,750.**

Independent complaints management

A **new Complaints Process** means that high risk issues are investigated **independent of sports** by the agency – this has increased trust in this impartial process by members making complaints.



In the past two years:

- We have managed **over 1,200 allegation-based integrity matters** since we started.
- **Over 70%** of these matters related to **Child Safeguarding and Member Protection.**
- **Over 100 matters have resulted in educative action or an investigation.**
- Our investigations found **44 substantiated breaches of integrity policies.**
- We now receive **40-50 NIF matters a month (complaints and reports).**

Under the **Safety in Sport Division**, we have a **Confidential Reporting Scheme** and have set up a **Safe Sport Hotline** to offer members of sport an opportunity to share their stories with us.

The service is available from 7am-7pm, 365 days a year by calling 1800 161 361.

1800 161 361

Law enforcement

- Over 170 matters have been **referred to law enforcement for consideration of action.**
- **MoUs** signed with all state/territory & Commonwealth Law Enforcement agencies
- We've held 3 annual **Threats to Sports Law Enforcement conferences**



"Our partnerships with sport, law enforcement, intelligence, safeguarding and regulatory agencies are crucial to protecting athletes and the integrity of our sports and competitions at home and abroad."

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Sport Integrity Australia's focus is policy development, complaint handling, intelligence, investigations, and education, outreach and capability building. Sport Integrity Australia continues to function as Australia's National Anti-Doping Organisation.

Sport Integrity Australia consists of more than 300 office, remote and field-based staff, primarily based in Canberra, but with a substantial workforce deployed throughout Australia to undertake anti-doping missions and related activities.

Sport Integrity Australia conducts the following key activities:

- a. Triage, Assessment and Dissemination of incoming information
 - i. Sport Integrity Australia receives reports and complaints about doping, child abuse, discrimination, harassment, competition manipulation and other sport integrity related matters via several methods including:
 - Email
 - Phone
 - Web form
 - ii. Currently, two teams within Sport Integrity Australia triage and assess these reports (depending on the nature of the report) and make recommendations on suitable treatment options. One team has primary focus on doping related reports, with another team responsible for complaint handling (which almost exclusively relate to non-doping related matters). These options can range from recording the information for intelligence purposes, undertaking education or engagement activities, liaising with the relevant sporting body, referring to appropriate enforcement body right through to testing or investigation.
 - iii. Information reports are also received from other organisations including law enforcement agencies, government agencies and sporting bodies.
 - iv. Depending on the nature of the information received, Sport Integrity Australia will often liaise with partner agencies and provide formal disseminations of information.
 - v. Appropriate intake and handling of sensitive whistle-blower disclosures (future activity)
- b. Anti-Doping and Integrity Investigations
 - i. Sport Integrity Australia utilises in-house expertise to conduct investigations into allegations of doping, member protection, child safeguarding and other sport integrity related issues. Sport Integrity Australia investigations are conducted in accordance with the Australian Government Investigations Standards (AGIS).
 - ii. These investigations will obtain all relevant information, then consider the known facts around the incident, as well as available intelligence from both internal and external sources (such as partner agencies), to determine an appropriate outcome.
- c. Review of scientific / testing results
 - i. An in-house Science and Medicine Team are responsible for receiving laboratory results from anti-doping testing missions.
 - ii. The team will review these results and provide an expert evaluation on the result, this can include input from independent experts external to Sport Integrity Australia.
 - iii. These assessments further inform intelligence collection activities, investigations and future anti-doping testing missions.
- d. Planning and management of anti-doping testing missions
 - i. Anti-doping testing missions are a primary function of Sport Integrity Australia, with a dedicated team responsible for the planning and management of such missions.
 - ii. Utilising inputs from Science and Medicine Team reviews, available intelligence, and adhering to World Anti-Doping (WAD) Code standards, hundreds of testing missions are planned each year for several dozen different sports within Australia from recreational through to elite levels.
- e. Education and related activities to prevent non-compliance
 - i. Sport Integrity Australia has a comprehensive education program delivered by a dedicated team, including athlete educators to enhance the connection and support to athletes. The program focuses on all integrity related issues in sport and aims to prevent these problems from occurring.

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- ii. Education is viewed as a viable first response to allegations of doping or other sport integrity issues, which is often informed by available intelligence or current trends observed within the sporting community.
- iii. Education is delivered to all levels of sport to some degree, be it via online course or face to face presentations.

Since its inception—and previously under the banner of ASADA—Sport Integrity Australia’s investigative and intelligence processes and practices have evolved, as has the type and level of information being captured. Specifically, from a predominantly doping focused investigative and intelligence function, Sport Integrity Australia now receives information related to all integrity matters in sport, with increased levels of sensitivity and welfare implications.

The current information case management system has been in place for more than ten years, and minimal investment has been given to enhancing its capability to address Sport Integrity Australia’s new responsibilities.

Staff currently use a wide range of capabilities and systems that are often not integrated or accessible externally.

The current management of cases and related activities via disparate systems has highlighted key issues:

- There are disparate processes across business areas, resulting in a lack of consistency and complex, inefficient processes.
- Record keeping, workflows, decision recording and reporting are inconsistent. As it is currently used by most business areas, the current system is not viewed as a system that can support and document the entire case management process.
- Information is not sufficiently searchable, and there is limited ability to filter by attributes that we may be required to report on.
- Increased workload and duplication of entering/extracting information.
- Excessive administrative burden on users.
- Inadequate and non-automated connectivity between the current system and our current record keeping system – TRIM/Content Manager.
- Inadequate reporting capability, requiring significant manual effort to validate results.
- Unintuitive, and dated user interface.
- Increased personal and sensitive information being shared with /stored by Sport Integrity Australia and increased time sensitivities in handling information and managing cases due to athlete and complainant welfare aspects

Where we need to be

Sport Integrity Australia – Expanded Integrity Remit and Australia’s National Anti-Doping Organisation (NADO) 2023-beyond

The foundations of where we need to be, have been developed through government investment in the then ASADA and through to the current Sport Integrity Australia.

As briefly discussed in the Executive summary, this Impact Analysis discusses in detail what Safety In Sport will provide to the Australian sporting ecosystem, it briefly discusses other elements of Sport Integrity Australia’s remit (anti-doping, competition manipulation) to provide the reader with an understanding of the relationship between activities and our stakeholders.

The future of Sport Integrity Australia and sport integrity in Australia requires;

A Sophisticated Anti-doping framework and remain a signatory to the World Anti-Doping Code. This will require sophisticated and cutting-edge capability to deliver the Green and Gold decade of events free from the scourge of performance and image enhancing drugs (PIEDs). We must continue to build upon the current efforts of Sport Integrity Australia to become a more sophisticated and proactive regulator.

Cheating in sport using PIEDs has, in some cases, become more sophisticated than Sport Integrity Australia’s capabilities to detect, deter or disrupt their use. Enhancing Sport Integrity Australia’s Anti-doping capability in particular, intelligence, investigations and forensic tools will ensure Australian sport and major events hosted in our country remain safe and fair for all. Maintaining the Australian Sports Drug Testing Laboratory is an essential element of our future and a key enabler to hosting the 2032 Olympics and Paralympics.

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Ratification of the Macolin Convention and establishment of National Sport Integrity Offences are two key recommendations of the Wood Review designed to further strengthen Australia's ability to protect sports integrity outcomes by addressing evolving competition manipulation threats, betting-related corruption, and criminal activity. These will provide clarity, transparency, and consistency across government jurisdictions. This will ensure sports wagering occurs within a regulatory framework to effectively protect the integrity of sport and ensure Australian sporting competitions are more resistant to manipulation threats. These initiatives will enhance and provide a legal basis for the implementation of an Australian Sport Wagering Scheme (ASWS).

Broader intelligence capability. A growing area of focus, and developing capability, is the need to enhance our strategic awareness of the broader sports integrity threat environment, via more efficient and effective analysis of data we acquire via the incoming information methods above, partner agency reporting, and environmental scanning. Strategic analysis is underpinned by access to information from a wide variety of sources, and the ability to manipulate various data sets to gain insight into trends and themes impacting the broad integrity threat environment.

We have a small number of licences for social media monitoring tools currently held by the Intelligence team, this enables monitoring of individual social media accounts. These tools have the potential to benefit the agency more broadly, including enabling better-targeted testing programs and monitoring of sanctioned persons that present a threat to the integrity of sport; to date, we have been unable to fund broader access to these tools.

Further, current tools do not provide the ability to scrape social media/forums/the web for broader analysis of sentiment, which would significantly bolster our understanding of the strategic threat environment across Sport Integrity Australia's remit. By scraping information from the online environment, we can tap into the sentiment of those involved in the sporting community, to understand the issues that we otherwise have no visibility of/people may not be reporting to us directly.

Access to analytical tools to draw out sentiment in open source would enable us to continue to build our awareness of the sports integrity threat environment and provide well-informed expertise to key stakeholders—particularly sports—to mitigate threats to sports integrity.

We anticipate that sports will directly benefit from receiving the outcomes of this work, building their capability to identify threats and report them to SIA, as well as being a beneficiary of programs and future intelligence reports that this research will inform. This resource can be shared with other Anti-Doping Organisations, and relevant partner agencies to develop international capability. This will contribute to Sport Integrity Australia being recognised as a global leader in addressing threats to sports integrity.

Safety In Sport. The Safety in Sport initiative was announced September 2022 to deal with a range of issues including discrimination based on race, culture, sexual and gender identity as well as abuse and mistreatment across all levels of Australian sport. It outlined an expansion of the capability of Sport Integrity Australia's existing reporting mechanisms to include an anonymous reporting capability focusing on wider racial and cultural issues in sport and a broadening of the education platform to inform culturally sensitive issues.

Increased investment in Sport Integrity Australia's capabilities, technologies and research is required to stay ahead of ever evolving whole of sport issues and associated integrity threats such as concussion, para classification (intentional misrepresentation), esports and transgender inclusion, to shape nationally consistent policy, assess the threats to integrity and provide advice and referrals to experts where required.

Sport Integrity Australia needs to ensure that our services and activities are aligned to the specific needs of women and girls, First Nations people, children, and those from cultural and linguistically diverse backgrounds.

The presented Safety in Sport options will enable us to enhance and diversify our capability to deliver against government intent and align to other government initiatives such as Play Our Way program², National High Performance Sports Strategy³, National Sport Participation Strategy⁴, Building a Sustainable Legacy⁵.

To support effective implementation of Safety in Sport, Sport Integrity Australia requires a **Case Management** system. It must be an intuitive, user-friendly, feature-rich system to underpin triage, assessment, review, investigation and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping.

² [Securing a sporting legacy for women and girls | Prime Minister of Australia \(pm.gov.au\)](https://www.prm.gov.au)

³ [Delivering new National High Performance Sports Strategy | Health Portfolio Ministers | Australian Government Department of Health and Aged Care](https://www.health.gov.au)

⁴ [National Sport Participation Strategy | Australian Sports Commission \(ausport.gov.au\)](https://www.ausport.gov.au)

⁵ [Building a sustainable legacy | Clearinghouse for Sport](https://www.clearinghousefor.com.au)

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This system will enable Sport Integrity Australia to record and manage these activities consistent with the Australian Standard on Records Management (AS ISO 15489), privacy principles and security standards effectively and efficiently. The system will seamlessly integrate with other Microsoft products already rolled out in Sport Integrity Australia, including Outlook, Teams, SharePoint, PowerBI and Power Apps.

Sport Integrity Australia wishes to foster an internal culture that promotes continual innovation and integration by end users within the Dynamics 365 and other Microsoft platforms, to ultimately accelerate business performance. The system - together with improved business processes - will achieve the following outcomes:

- Standardised practices and processes for the capture and management of information relating to complaints, assessments, intelligence, and investigations
- Captured information is easily accessible and aligned to Sport Integrity Australia and legislative requirements for complaint, assessment, investigative and intelligence activities
- Traceability and audit capabilities for decisions and workflow actions
- Effective and timely access to relevant intelligence and investigation information, which in turn will support and streamline operational activities
- Replacement of current disparate systems and manual processes with a core system that offers enhanced automation, reporting and analysis across Sport Integrity Australia's key activities
- Enhanced ability to detect threats and risks to integrity in sport in Australia, including trends, vulnerabilities and opportunities for disruption.
- Enable Sport Integrity Australia to undertake its key activities—ideally utilising a whole-of-agency, mission focussed approach—with functionality to support the following at a minimum:
 - Receipt, triage, assessment and dissemination of information including intelligence, complaints, reports, and scientific information
 - Quickly view the entirety of a case from, end-to-end (i.e. to produce case studies and help us learn and continually improve our processes).
 - Ability to filter a range of attributes to gain insight into specific areas of interest/concern, such as particular demographics, matter types, or other factors
 - That is continually enhanced, maintained and improved in response to strategic objectives, technical advancements, Security requirements, customer feedback, and market forces.

To support effective implementation of Safety In Sport, Sport Integrity Australia requires enhanced **Education** capability. We provide education resources about sport integrity for all levels of athletes, their parents, teachers, coaches and support personnel. Currently, we have educational content on; anti-doping, match-fixing, illicit drugs, ethical decision making, safeguarding and the National Integrity Framework and in different formats, including; eLearning courses, videos, print items, digital items, apps, virtual and augmented reality, targeted face to face sessions, outreach events and a schools' program to support the National Health and Physical Education Curriculum.

Effective implementation of Safety In Sport will require additional staff resources to expand education content to cover bullying, harassment, discrimination and emerging safety issues. All resources will be reviewed from a culture and diversity perspective. All resources will be reviewed from an inclusion and accessibility perspective, for example translation of content into different languages. Educating at all levels on the importance of Safety In Sport is the key to raising awareness, and prevention of integrity issues.

Each of the options within this impact assessment aim to enhance existing education resources, staff capability and agency capacity to consider wider Safety In Sport threats, ensure accessibility, culture and diversity through the following innovative programs:

- Face to Face and outreach Events
Our Clean Sport Educators provide face to face education sessions for sporting groups around the country. All presenters are either current or former elite athletes. They provide engaging and interactive presentations that will meet the needs of the group and sport. We can also set up and attend a booth at major sporting events, providing staff, a marquee, technology and educational merchandise to encourage conversations and answer questions with athletes, parents and support personnel.
- eLearning hub
Providing online courses, videos and helpful resources about topics including anti-doping, match fixing, substances of abuse, ethical decision-making. We look to enhance these by focusing on culture and diversity, accessibility and increased reach.
- APPS and Virtual Reality
We will enhance our current range of digital resources that are fun to use and educational at the same time,

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promoting innovative teaching methods and expanded reach. These include our apps, Sport Integrity app and Health Effects of Doping augmented reality app. We also have an [Anti-Doping Sample Collection virtual reality experience](#).

The Sport Integrity mobile app is a 'one-stop-shop' to; Report an integrity issue or suspicious activities, give feedback or ask a question about integrity matters, find out guiding information on all sport integrity issues, anti-doping rules, testing programs, health effects of doping, supplement and nutrition advice and more, check medications on Global DRO, find low risk 'batch-tested' supplements and check whether you need an in-advance Therapeutic Use Exemption.

The Sport Integrity App has been downloaded by more than 30,000 Australians and is free to download from [Google Play](#) or [Apple stores](#).

- Schools Program

It is important that our future elite athletes, coaches and support personnel understand about integrity in sport. To help, we continue to enhance our free school resources and professional development opportunities for teachers. Resources include; [Lesson Guides](#) to complement health and physical education curriculum subjects, various award-winning online courses, mobile apps, posters, electronic advertisements, classroom activities, assessment materials.

To assist teachers with our school content, we have produced the [Secondary Schools Resource Kit](#) to further explain our resources and where they can be used with elite pathway athletes and within the classroom. We can also provide low-cost school visits to talk about subjects such as; 'food first' nutrition messaging, the risks of supplements, the dangers of performance enhancing and image enhancing drugs. These are presented by our team of elite athlete Clean Sport Educators.

Our education staff also visit schools for teacher professional development sessions (either in person or via a webinar). These help teachers understand and apply our education material, online learning tools and curriculum-aligned lesson plans guides.

- Play by the Rules

[Play by the Rules](#) is for sport administrators, coaches, officials, players, parents and spectators. The program provides tools to prevent and manage problems such as discrimination, harassment, child safety, inclusion and integrity in sport. This tool was built by government and non-government sporting and child protection agencies across Australia.

- Safeguarding Resource Suite

Resources for Clubs and Sporting Organisations including:

- ❖ responding and reporting to a breach of the child safeguarding policy (flowchart)
- ❖ child protection reporting information
- ❖ recruitment and screening of staff and volunteers in child-related positions
- ❖ recruitment and screening checklist
- ❖ induction of new volunteers and staff checklist
- ❖ events involving overnight stays
- ❖ overnight or extended stays travel checklist
- ❖ organising day trips involving children and young people in sport
- ❖ day trips and competitions checklist
- ❖ transporting children and young people in sport
- ❖ safeguarding considerations for events held in public areas
- ❖ events held in public areas checklist
- ❖ communicating online or electronically with children and young people in sport
- ❖ how to involve children and young people in your sporting organisation

Resources for Parents and Carers including;

- ❖ child safe practices do's and don'ts booklet
- ❖ guide to selecting a safe sporting club
- ❖ choosing a child safe club (poster)
- ❖ checklist for selecting a safe sport club

Resources - safeguarding - for children and young people including;

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- ❖ safeguarding - learn about your rights at sport (ages 7-12)
- ❖ safeguarding - your rights at sport (ages 13-17)
- ❖ safeguarding - how your sport looks after kids (ages 7-12)
- ❖ safeguarding - how your sport looks after you (ages 13-17)
- ❖ safeguarding - how your sport looks after all its participants (ages 13-17)
- ❖ safeguarding - how we keep your competition fair and honest (ages 13-17)
- ❖ safeguarding - protecting your sport from the improper use of drugs and medicine (ages 13-17)

Providing education support to sports that can't afford to do it alone is an area of continued focus of Sport Integrity Australia. Sport may be a national passion for millions of Australians, but that does not protect sporting organisations of any size from the mounting threat posed by cyberattacks and cybercriminals searching for easy wins. One slip-up could delete a sporting organisation's data, disclose personal details and information, take down competitions, lead to financial fraud or cause devastating reputational damage. As an example, Sport Integrity Australia developed a Cyber Safety and Security in Sport course with input from the Australian Signals Directorate's Australian Cyber Security Centre (ACSC) and the eSafety Commissioner to help sporting communities navigate cyber challenges and, ultimately, create a safer online environment for everyone in sport.

The course will help users:

- Identify the cyber security risks facing their organisation, and the impact of getting it wrong
- Identify what to do if they are hacked
- Protect their accounts and devices
- Understand what to do if someone in their sport experiences online abuse.

Sport Integrity Australia Director of Education Alexis Cooper said the course provided sporting organisations with an immediate ability to upgrade their cyber security and online safety knowledge and help protect their members. "Cyber security for sporting organisations is more relevant now than ever before," Ms Cooper said. "From grassroots clubs holding personal data through to national organisations hosting and participating in major international sporting events, inadequate cyber security can cripple sporting organisations."

The Cyber Safety and Security in Sport course utilised a range of case studies from sporting organisations around the world to give relevance to the cyber safety content, Ms Cooper said, and included much needed education on online abuse in sport and integrity threats, such as match-fixing approaches.

"There are examples from across the sporting landscape, from the English Premier League to international athletics meets all the way down to examples from community sporting clubs in Australia, to help educate sporting organisations on the scenarios they could face," Ms Cooper said.

To complement the benefits currently experienced from having **Integrity Managers** embedded within National Sporting Organisations (NSOs) and National Sporting Organisations for People with Disability (NSODs), further investment needs to be made at the State/Territory and community sporting club level.

The proposed State Integrity Manager Grant Program is aimed at supporting State/Territory agencies and Sporting clubs, to employ an Integrity Manager (or Integrity Officer) to increase the sports integrity capability by embedding the National Integrity Framework at all levels of the sport. This will be facilitated through the provision of funding to State/Territory agencies to employ an Integrity Manager on either a full-time or part-time basis.

The Integrity Manager will be responsible for embedding policies into all levels of the sport that ensure participants have confidence that they are participating in a safe, clean, inclusive, and fair sport. The primary policy suite that supports this environment is the National Integrity Framework (NIF), and a key role for the Integrity Manager is NIF implementation through education, support and guidance to the sport and its members.

The Australian Sports Commission will administer the Program and work with Sport Integrity Australia in the development of program guidelines and the assessment of successful grant recipients and funding. In addition to the Program, Sport Integrity Australia will provide support to clubs through the Integrity Manager Network, along with a suite of resources including policy fact sheets, eLearning courses, staff information packs, training courses and promotional materials.

Further investment in **research** is critical to future proofing sport from integrity threats. Building upon existing research partnerships, Sport Integrity Australia aims to better understand the environment in which we operate, enhance our existing capabilities and resources and create a safe sporting environment for all participants.

Partnering with Australian universities, the agency seeks to set up an internationally recognised hub for research because no one organisation and no one country can answer all the different challenges and threats to sport, working with the best minds across a number of different industries to feed that expertise into the sports industry and start solving some of these problems at the community level and all the way through to the high performance level.

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As an example, understanding the nature and impact of online harm upon female athletes is the focus of a joint research project with the University of Canberra that commenced in November 2022. In what is a continuation of Sport Integrity Australia's partnership with the University of Canberra (UC), the initiative is aimed at strengthening our capabilities to deal with threats to integrity. The research project was vital to help stem the scourge of online abuse directed at sportswomen.

"When it comes to cyber bullying, the PhD is the Australian Government taking the lead with UC to better understand the problem and how we might respond to it because it's becoming a bigger problem than we can manage alone⁶," CEO David Sharpe said.

"Partnering with a world-leading tertiary institute is critical to inform our business and to provide us with evidence-based approach to sport integrity responses." Mr Sharpe said it was important to partner with the likes of the University of Canberra and other agencies, such as the Office of the eSafety Commissioner, to best understand how to address this emerging and ever-growing threat to sport and the community more broadly.

Cyber-hate and trolling are often experienced by women in sport and are more prevalent against women of colour and women with a disability. Research has shown that this has been identified as a barrier to entry and retention.

University of Canberra Vice-Chancellor Professor Paddy Nixon said this partnership "connects us to the real challenges".

"With Sport Integrity Australia at the forefront of sport integrity and we, as a university leading sport integrity research in Australia, this partnership is very unique," he said. "This has been done in very few places in the world."

He said the MoU between Sport Integrity Australia and the University of Canberra also allowed for future collaboration between the two bodies in scientific and integrity in sport research.

UC Director of Sport Carrie Graf said sport integrity was an important theme running through the university's entire sporting strategy so "the partnership with Sport Integrity Australia is absolutely critical to the growth and work we are doing".

"The research we can do in partnership with Sport Integrity Australia can have a major impact on the community more broadly, not just the sports community. It's such a critical piece in the sport industry."

Associate Professor Dr Catherine Ordway, the Sport Integrity Research Lead at the university, said the partnership had far-reaching possibilities beyond the PhD announced today.

⁶ [Cyber bullying of women in sport the focus of Sport Integrity Australia-UC project | Sport Integrity Australia](#)

1. What is the problem you are trying to solve?

All people who participate in sport deserve to do so in a safe and protected environment – threats are ever evolving and without integrity underpinning sport participation, the great benefits that sport delivers to the Australian community are at risk of being lost.

Sport plays a significant part in Australia's way of life and the Australian economy. Australians have no tolerance for corruption in sport and the Wood Review indicated that 'without the presence of a comprehensive, effective and nationally coordinated response capability, the hard-earned reputation of sport in this country risks being tarnished'.

Sports people at all levels (community/grass roots right through to elite) need to know that they are competing in a fair and safe environment. Australia has always had high sport integrity standards and a strong position on safety, fairness and inclusion.

A public loss of confidence in sport as being a safe and fair place to invest their livelihood has direct consequences for the health, economic, social, and cultural benefits that sports generate.

For the Safety In Sport Initiative to be effective, appropriation funding is required. As detailed in section 2.3, over 50% of appropriation for Sport Integrity Australia ceases on 30 June 2024, with funding returning to pre-2018 levels to the then Australian Sports Anti-Doping Authority. Should funding revert to pre-2018 levels, Sport Integrity Australia's priority will revert to a focus on anti-doping advocacy, education, sample collection, investigations, presenting cases at hearings, sanction recommendation and the development, approval and monitoring of sporting organisations' anti-doping policies to ensure we maintain a WAD Code compliant testing regime, with only basic, light touch integrity capability.

1.1 What are the threats?

Sport Integrity Australia coordinates a national approach to sports integrity threats in Australia, as set out by the Act. These threats are categorised broadly under the headings in the below graphic:



Sports integrity threats are evolving at an unprecedented rate due to the commercialisation of sport and sporting organisations and accelerating technological advancement. The more money that comes into sport through prizemoney, sponsorship and television rights means the stakes increase and the opportunities for integrity risks such as competition manipulation, illegal gambling, and pressure on athletes, coaches and officials to win increases significantly. Take the examples of women and para-athletes in sport – as recent as 5-10 years ago both groups were struggling for attention and funding to their sports and sporting events. Now women's sporting events and Paralympic events are watched by millions and provide ever increasing careers for their participants, however integrity matters such as doping and intentional misrepresentation (for para-athletes) have increased accordingly.

Discrimination and abuse can be perpetrated by members of sporting organisations and non-members (the general public or fans/opposing fans). While there are many examples of the very public incidents of online abuse at the elite level of sport,

what is not so well published is at the grassroots level following any particular weekend at local sporting fields around the nation there will invariably be cases of online abuse, taunts and bullying by players, bullying by spectators, parents abusing officials or club administrators for decisions (Oliver, 2015).

Australian sport has been affected by major sports integrity scandals – representing the local impact of a globally deteriorating sports integrity environment.

In addition to the examples provided under each section, statistics have been provided in Figure 1 – where we are.

1.1.1 Failure to protect members from discrimination

Sport is a reflection of society, both good and bad. Just as there is sexism, racism, ableism and homophobia in society, these issues also exist in sport.

We know that many sports participants still endure the harmful and discriminatory attitudes of the broader Australian society. A 2015 study found that ethnic minority, lesbian, gay, bisexual, transgender and disabled athletes were at significantly higher risk of all forms of interpersonal violence in sport—including sexual abuse—than other groups.

In Australia, recent research on gender, sexism and homophobia in sport indicates that homophobia and sexism are significant stressors for LGBTIQ+ people within community sport (Symons, O’Sullivan & Polman, 2017). The National LGBTI Health Alliance found 56 percent of all participants and 72% of gay men believe homophobia is more common in Australian sport than the rest of society.

In Denison and Kitchen’s study ‘*Out on the Fields*’, the first international study on homophobia in sport, according to participants 80% witnessed or experienced homophobia in sport in Australia. *The Game to Play? Report - Exploring the Experiences and Attitudes Towards Sport, Exercise and Physical Activity Amongst Same Sex Attracted and Gender Diverse Young People* found the culture around sport and physical exercise was considered hostile and unwelcoming to same-sex attracted, sex and gender diverse (SSASGD) young people; negative media attention and debates around sexuality and gender diverse people also impacted SSASGD young people’s participation in sports.

eSafety research found that in Australia, most adults will have to deal with a negative online experience: Aboriginal and Torres Strait Islanders are more likely to have a negative experience than others; and depending on the issue, people identifying as LGBTIQ+, those speaking a language other than English at home and people living with a disability also had higher than average negative online experiences. Intersectional factors play a significant role in drawing abuse and trolling on the internet. In other words, a person’s age, gender, ethnicity or sexual orientation may make them more susceptible to online risk and harm.

Kerr, Jewett, MacPherson and Stirling (2016) believe that sport provides a unique context for bullying behaviours to occur. They believe that some of the characteristics unique to the sporting environment, including the competitive climate in which people participate and a general acceptance of bullying behaviours as part of the culture of sport, can increase the likelihood for bullying to occur.

A study titled *Girls and women in Australian football umpiring: understanding registration, participation and retention* into female Aussie rules umpires uncovered a culture of sexual harassment, misogyny and spectator abuse that is driving women away from officiating in the sport. Findings indicate that there are systemic, institutional issues with supporting women and girls in umpiring, regardless of region or level, which negatively impact the experiences and numbers of females in umpiring.

Racism remains a significant social issue in Australia and exists in all levels of sport. Once when most racial abuse issues occurred face to face at events between players or spectators has now moved to online abuse through social media channels. It is known that Aboriginal and Torres Strait Islander youth online experiences are worse than the rest of the community and this has a detrimental impact on their mental well-being, their identity and can also impact on their lives. eSafety work with the AFL monitoring abuse Australian football players cop online and found ATSI people were three times more likely to receive targeted online hate and harassment.

Broadly defined as ‘member protection’ issues, abuse, bullying, harassment, sexual misconduct, unlawful discrimination, victimisation, and vilification were the most prevalent subject of integrity complaints.

Example: In 2023, Sydney Swans AFL indigenous player Adam Goodes spoke out about his experience of racism all through his football career, even at the elite level on and off the playing field. The Age reported on 17 April 2023 that the AFL had responded to 23 reports of racist abuse directed at players across AFL, VFL and Talent league since the start of the season.⁷

⁷ Codesports April 21, 2023

1.1.2 Abuse of Children in Sport

Sport Integrity Australia operates at the Commonwealth level as an independent complaint handling body on behalf of sports that have adopted the NIF. It only has jurisdiction to investigate matters linked to sport, where there is an alleged breach of the sport's Child Safeguarding Policy or an allegation of discrimination. Any matter that involves a child at risk is referred to the relevant Law Enforcement Agency. The opportunistic mentality of potential predators combined with the competitive nature of sport, and the associated pressure with this mentality makes children particularly vulnerable to physical and emotional abuse in a sporting environment.

Eighty-two per cent of people sampled in a 2022 study conducted by Victoria University have reported experiencing at least one form of interpersonal violence when participating in community sport as a child. The survey, which is the most comprehensive of its kind in Australia, asked 886 adults whether they had experienced physical, sexual or psychological violence, as well as neglect, from either coaches, peers or parents during childhood. Seventy-six per cent said they had experienced psychological violence or neglect, 66 per cent reported physical violence and 38 per cent reported sexual violence. One in three respondents, meanwhile, said they had experienced all four forms of violence. Women experienced higher rates of sexual and psychological violence, as well as neglect. The respondents had participated in a large variety of sports, with nearly 70 represented.

Alexander, Stafford and Lewis (2011) examined the experiences of children participating in organised sport in the United Kingdom (UK) to enhance understanding of negative experiences and harm in sport. Over 6,000 young people (age 18-22) completed an online survey about their experiences of sport as children (up to age 16). Their findings highlighted virtual spaces as potential sites for child sexual grooming to occur and acknowledged the need for greater attention to be paid to virtual spaces to understand the risks they pose as information technologies evolve.

Sport Integrity Australia's Annual Strategic Threat Assessment aims to strengthen our understanding of key issues impacting the sports integrity threat environment, now and on the horizon. It provides an evidence base to underpin an efficient, effective approach to deterring, disrupting, and detecting threats. The 2023-24 assessment has identified the Child safeguarding threat level in sport is High, requiring targeted and collaborative efforts to protect children in sport.

Example: Sexual abuse of minors in sporting environments as demonstrated in the 2020 Australian Human Rights Commission report into Australian gymnastics. The report painted a picture of a sport with systemic risks to children of physical, psychological, and sexual abuse at all levels of the sport. The Royal Commission into Institutional Responses to Child Sexual Abuse underlined the need for an ongoing commitment to protecting children in sporting environments.

1.1.3 Failure to keep up with advancing technology

Digital technologies are evolving more quickly than the ability of government to regulate them, creating a growing gap known as the 'pacing problem'. The threats we face are through both the physical world and increasingly in the digital world. These are evolving faster than law enforcement and regulatory agencies.

The technology gap is widening at an accelerating rate. Innovations such as artificial intelligence, the internet-of-things, encrypted messaging, and cryptocurrencies are widely available and are likely being adopted and utilised by those seeking to harm athletes and institutions.

Sport is one area that has seen seismic progression as a result of changes in digital technologies and online communication. 'People now watch sport online, communicate with other fans or followers, and consume sport in ways that were once unimaginable. Sports fans can now take part in a virtual experience, providing a virtual commentary surrounding sporting experiences in real time and long after a final whistle has sounded' (Kavanagh & Jones, 2017). 'Athletes and other sports personnel can use digital environments to connect with fans – promoting their own brand or sharing their private lives, making them more accessible to fans or followers of sport' (Guerin-Eagleman & Burch, 2016) – and 'sports clubs or sports media organisations can communicate with fans and spectators, presenting news stories and live scores with immediacy and exponential reach' (Kavanagh, Litchfield, & Osborne, 2021).

In recent years, there have been numerous high-profile incidents where social media has been used by members of sporting communities to facilitate anti-social, abusive, racist, threatening, and even illegal behaviour. These types of activities have caused distress to individuals and groups of members, and some have even resulted in long-term damage to the reputation of either the sport and/or the individuals involved.

The online environment also provides the convenience to purchase prohibited substances otherwise not readily available in the physical world, increasing the means for athletes to dope.

eSafety Commissioner Julie Inman Grant said online abuse can take an incalculable mental health toll on participants, especially when clubs find themselves facing a torrent of online abuse by disappointed fans. "Some of the abuse we're seeing is personal, racist, misogynistic, violent, even extending to death threats. This type of abuse is deeply harmful and can make participants feel unsafe, undermining their enjoyment and love of the game," Ms Inman Grant said.

Kavanagh, Litchfield & Osborne (2019) suggest in virtual environments people of all ages can be vulnerable to manipulation, grooming, and coercion. Perpetrators may use digital platforms and communication to target individuals and coerce them into

taking part in activities that breach sporting integrity rules (i.e., match fixing or doping) and could further constitute criminal offences. In an alarming connection to other integrity issues in sport, Queensland Police have revealed up and coming athletes are being lured to take part in match-fixing via their social media accounts. "You'll see that ex-players are approaching the up-and-coming players ... and usually the first point of contact is through social media, and they use their reputation and previous experience in the sport to try and influence the up-and-coming players".

Example: Josh Cavallo, Adelaide United soccer player received an avalanche of homophobic abuse online when the Adelaide defender came out in October 2021. A 2020 players union survey revealed over 50 percent of players in the A-League men's and women's competitions confronted some kind of abuse online, some of it horrific.

1.1.4 Financial Pressures

Economic drivers are impacting the post COVID-19 economy, with significant uncertainty surrounding the impact of global trade tensions, migration trends, equity prices, inflation, and cost-of-living pressures. Subdued economic growth and increased competition for funding are likely, decreasing the likelihood for significant funding injections to grow capacity or to invest in national and regional capability.

The rising cost of living which has seen a decline in revenue from memberships as people engage in less structured activities, and there is a greater reliance on volunteers who may not know their integrity obligations. For these reasons, it is reasonably expected that financing integrity initiatives, programs and investigations will be a lower priority for sport.

An overwhelming number of Australia's elite athletes are under significant financial pressure, which has flow on impacts on their mental health, their families' financial security and their ability to stay in the sport. Recent research⁸ shows there is a lot of support needed to meet financial and mental health gaps and address other challenges reported by our athletes.

Key points from August 2023 Australian Sports Foundation (ASF) survey titled 'Running on Empty' include:

- Almost half of elite athletes (46%) over the age of 18 are earning incomes from all sources of less than \$23,000 per annum.
- two in five (42%) elite athletes aged 18-34 are suffering poor mental health because of their financial predicament, with a gap between the mental health support needed by athletes and the support they are currently being offered.
- 1 in 2 elite athletes considered leaving their sport (58% for female athletes).

Example: A 7 May 2022 ABC⁹ article titled 'Kids sport may fail to get across the family budget line as cost-of-living sours. The article noted, the rising cost of living is putting a strain on families paying for children's sport and according to a survey, 50 per cent of Australian clubs have seen a membership decrease due to financial burden. The below graph¹⁰ shows the rapid dropout rate of participants in football/soccer in Australia.

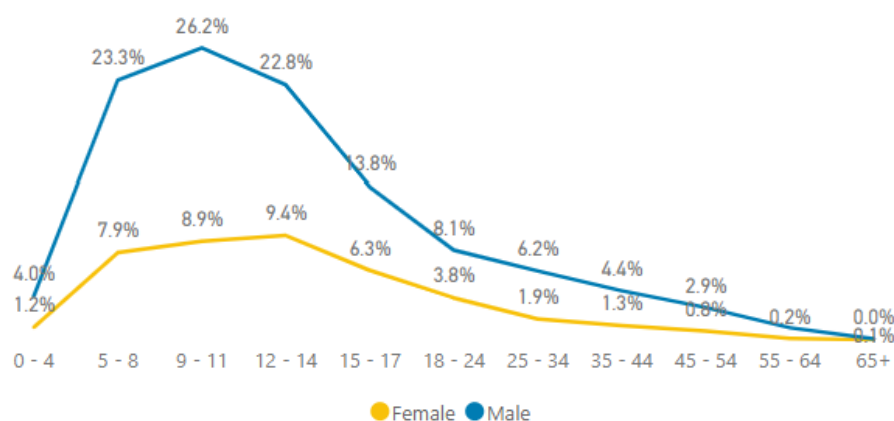
Figure 2. Football Australia participation by age group

⁸ ASF: Running on Empty report. August 2023

⁹ https://www.abc.net.au/news/2022-05-07/junior-sport-rising-costs-netball-football-sports-foundation/101040312?utm_campaign=abc_news_web&utm_content=link&utm_medium=content_shared&utm_source=abc_news_web

¹⁰ AUSPLAY_football/soccer report

Participation by Life Stage - Club



Figures are shown as the % of each age who have participated

1.1.5 Manipulation of Sporting Competitions

Insider threat and sabotage - A threat which may include anyone with means to access and/or provide relevant information for the purposes of competition manipulation. Sabotage is a rare technique, there have been overseas reports of suspected drugging of athletes. Modification, or interference with playing surfaces is another example.

Example: The 2018 Australian ball-tampering scandal was a cricket cheating scandal surrounding the Australian National Cricket team to manipulate the match by attempting to alter the condition of the ball. This incident raised questions about Australia’s commitment to fair play in sport.

1.1.6 Drugs or Doping Methods in Sport

Use of performance and image-enhancing drugs is assessed as endemic in the Australian community. These drugs are readily accessible online, and in some gyms and supplement stores. It’s likely widespread use of these drugs flows into sport.

Cheating in sport using Performance and Image Enhancing Drugs (PIEDs) has, in some cases, become more sophisticated than Sport Integrity Australia’s capabilities to detect, deter or disrupt their use. Enhancing Sport Integrity Australia’s Anti-doping capability in particular, intelligence, investigations and forensic tools will ensure Australian sport and major events hosted in our country remain fair for all.

Example: In 2012 the United States Anti-Doping Agency (USADA) charged US Cyclist Lance Armstrong with using, possessing and trafficking banned substances. USADA’s report on Armstrong noted him leading ‘the most sophisticated, professionalised and successful doping program that sport had ever seen.’

The Doping threat level in Australian sport has been assessed as *substantial* in the soon to be released Sport Integrity Australia Annual Strategic Threat Assessment.

“Performance enhancing drugs are almost certainly endemic in the community. The extent of use in sub-elite sport is currently an intelligence gap. There is a realistic possibility sophisticated doping may be occurring in Australian sport. This will not be uncovered by a testing program alone, requiring a greater focus on proactive intelligence collection”.

1.1 How have others addressed these threats?

As the importance of protecting the integrity of sport becomes clearer, many like-minded nations are also following the lead of Australia and making changes to further prioritise their efforts in this area.

United Kingdom

Noting that the responsibilities of sports organisations around integrity issues have come under increased scrutiny over recent years, with serious allegations of misconduct coming to light, the UK Government has released a [public call for evidence](#) which aims to explore how the current systems for managing sport integrity issues can be strengthened. The call for evidence will work alongside the sport and physical activity sector to identify the most pressing integrity challenges and potential improvements, including how structures around complaint handling and dispute resolution can be strengthened. Topics within scope of the UK review include:

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- misconduct (such as bullying, harassment, discrimination, safeguarding issues, verbal abuse, physical abuse, and other issues that could be described as “duty of care issues”)
- doping
- corruption and match-fixing
- concerns about the handling of any of the above matters by organisations responsible for the governance of sports

The call for evidence closes on 11 October 2023, and it could be expected the UK will move to a model similar to that currently in place in Australia.

New Zealand

New Zealand have also looked closely at the Australian model, and following their own review into integrity arrangements, it was [announced on 14 June](#) 2022 that an independent body to strengthen and protect the integrity of the sport and recreation system would be established. Drug Free Sport NZ will be folded into the new entity along with some of the integrity functions currently performed by Sport NZ, including the recently established independent Sport and Recreation Complaints and Mediation Service. The new body will also be responsible for implementing a National Code of Sport Integrity.

New Zealand officials have consulted regularly with Australia to inform their work as they developed the scope of the new entity and developed their integrity code through consultation with the sporting and community sector. Legislation recently passed the New Zealand parliament and it is expected the new entity will be operational in 2024.

Other

Following a similar trend to that of the UK and New Zealand – Australia has been contacted by many other nations who are invested in improving their sport integrity systems. The Canadian system is advanced, although facing public calls to expand and improve their service offerings to sport. Swiss Sport Integrity was recently established to address similar threats identified by Australia, and Sport Integrity Australia has assisted countries like the Netherlands, Malta, Japan, Singapore who are all in various stages of investigating how best to address integrity issues.

1.2 Who is affected by these threats?

It is noted that 80.3% of people aged 15 years and over participated in organised sport or physical activity once per week¹¹. This information is provided to show the interest in sport and participation across the broader Australian population and the extent to which these threats can have impact.

This section describes the Australian sporting ecosystem and how it interacts with government at various levels. It sets the scene for who Sport Integrity Australia as the regulator and co-partner is regulating, protecting and who the presented options will benefit. Analysis is focused on the people we are supporting and protecting. These are those that are active within the sport ecosystem at some level and is not extended to ‘casual observers’ or wider spectators of sport.

Sport in Australia is heavily reliant upon either funding from government grants or registration fees from grass root participants. Government (Australian, state/territory, and local) invests over AU\$1.3b annually¹² in sport at all levels. This includes investment in community participation, high performance, infrastructure, major events, and building a robust sports industry.

Australian sporting organisations and sports clubs (many operating as not-for-profit entities) play a pivotal role in the delivery of sport. Other significant contributors to the sector include schools and universities; peak sports bodies and advocacy groups; participants, whether in a playing, coaching, officiating, or administrative capacity (in a paid or volunteer basis); retailers of sporting goods and equipment; media, publishing, and news agencies; health, fitness, and medical practitioners; and many other service providers, organisations, and community groups.

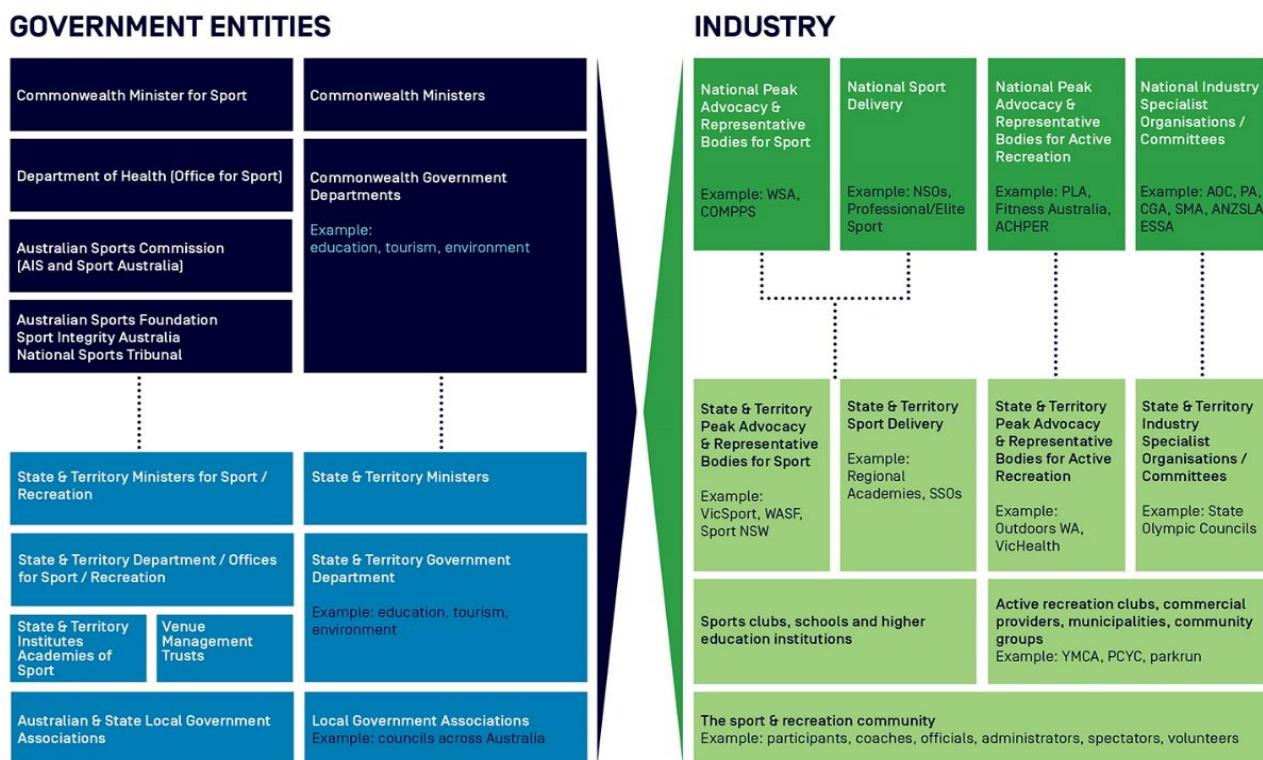
This is best illustrated though Figure 2 – The Sport Ecosystem¹³:

¹¹ Department of Health and Aged Care Annual Report 2021-22

¹² Clearinghouse for sport_Australian sport policy

¹³ Clearinghouse for sport

Figure 3. The Sport Ecosystem



National Sporting Organisations (NSOs) and National Sporting Organisations for people with a Disability (NSODs) develop sport from community participation through to high performance levels. NSO/Ds in most cases work closely with their respective State Sporting Organisations (SSOs) across Australian state and territory jurisdictions.

All of these organisations are required to be affiliated to an international federation and they work with the Australian Olympic Committee and Paralympics Australia to send athletes to elite international competitions.

Sport across all sizes and levels have recently articulated¹⁴ their top 4 challenges. These are summarised in table 1, with Administration Load featuring highly at each level of sport. Presented options provide resources to sport to assist with the administration associated with making it a safe place – from compliance with legislation such as Work Health And Safety Act, Discrimination Act, National Integrity Framework, to policy writing, procedure implementation, education, complaint management.

Table 1. Sports Top 4 Challenges

Club size	Top 4 Challenges
Small (1-199 members)	Not enough volunteers
	Obtaining funding
	Administration load
	Increasing participation
Medium (200-499 members)	Not enough volunteers
	Administration load
	Obtaining funding
	Grounds/facilities/equipment
Large	Administration load
	Grounds/facilities/equipment

¹⁴ ASF: Clubs under pressure report (May 2023)

Club size	Top 4 Challenges
(500-999 members)	Not enough volunteers
	Increasing operating and utility costs
Very large (1000+ members)	Administration load
	Grounds/facilities/equipment
	Not enough volunteers
	Obtaining funding

1.2.1 National Sporting Organisations and National Sporting Organisations for people with a Disability

These organisations play a huge role in the development, promotion and staging of sport in Australia from the grass roots through to the international level. They are responsible for the long-term development and sustainability of their sports. Between them, they have 8.95 million participants and it is estimated that there are over 70,000 registered not-for-profit sports clubs currently operating in Australia.

It is assessed that these options will impact nearly all of NSO/Ds with approximately 95% of Sport Integrity Australia's current activities relate to NSO/Ds, their athletes and sporting participants across all levels of sport.

There are a total of 97 NSOs and NSODs. A full list is provided at [Appendix A](#).

Of the 97, there are 7 'major' NSOs that are referred to as the Coalition of Major Professional and Participation Sports (COMPPS), refer Figure 4. The COMPPS consists of the national organisations that are the custodians of Australia's most prominent professional sports: Tennis, Football, Cricket, Rugby Union, Netball, Rugby League and AFL.

COMPPS members provide a wide range of public benefits through a self-funding business model. Most of their revenue is devoted to enhancing, promoting, and developing sport for all Australians. The role of COMPPS is to provide a collective response on behalf of its member sports where their interests are aligned.

Figure 4. COMPPS sports



1.2.2 State/Territory Sporting Organisations

SSOs, sometimes also called State Sporting Associations, are responsible for developing their sport from community participation to high performance levels in their respective jurisdiction.

They are normally required by state and territory governments to be affiliated with the recognised national governing body for their sport (NSO/D) and to meet required governance standards. SSOs work closely with state and territory departments of sport and recreation, clubs in their jurisdiction, as well as the national body and other state sporting organisations to develop their respective sports. State and territory departments of sport and recreation normally provide a list of recognised SSOs/SSAs, as well as relevant resources for organisations, on their websites. Due to the extensive number concerned, this Impact Analysis does not articulate or list them.

1.2.3 Flow on impacts

Each year, 14 million Australians participate in some form of sporting activity with a direct benefit on health and wellbeing, not to mention sport contributes \$35-47 billion to the economy. The Australian Government invests more than \$300 million to support high performance sport and encourage greater participation. The rise in popularity of women's sport and success of

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elite female athletes is promoting participation both on and off the field. The level of community involvement across the 2023 FIFA Women's world cup program is evidence of the positive impact sport has - both financially and culturally.

Safety In Sport is aimed at proactively addressing integrity threats associated with bullying, harassment, discrimination, racism and sexual misconduct in sport.

The flow on impacts of providing a safe sport environment are discussed in the examples below.

Example: Changing narrative around women's sport in the wake of the Matilda's success

The narrative around women's sport in Australia has changed dramatically in the past 6 months, much of it due to the Matilda's success. Prior to the Matilda's World Cup campaign discussion relating women's sport was around participation with very little analysis about tactics or individual strengths. This was mostly confined to male sports.

As the nation became captivated by the Matilda's the narrative changed from participation to expert and general public analysis of the Matilda's performances. The discussion in fact became what we have come to expect in analysis of male sports.

There was also greater discussion around women being elite athletes which is a breakthrough in Australian sport. The team's success also gave sportswomen a voice. At last they felt as though they had a platform to speak about issues relating to women's sport without being dismissed but instead taken seriously. This included several social issues such as human rights which the players felt strongly about.

It allowed young girls to speak with confidence about their hero sportswomen without being ridiculed by those who have promoted women's sport as being inferior to men's.

The Matilda's success also promoted discussion around parity and equality for women in sport across the board in Australia not just in women's sport.

The Matilda's success highlighted the difference in prize money for men and women across all sport. It wasn't confined to pay but became broader with calls for better conditions for women in sport in Australia. This includes better facilities, improved change rooms and a push for more resources to allow women to become full time sportspeople just like their male counterparts.

The Matilda's success also shone a light on other aspects of sport such as the lack of women coaching at an elite level in Australian sport not just football.

There was also a realisation that people want to watch women's sport on television. The ratings for the Matilda's games on Channel 7 were the highest for any program in the history of Australian television. This comes after FIFA struggled to get Australian television stations to buy the rights. The Matilda's success has also opened the door for a far greater desire to put women's sport on mainstream television. There is now a realisation that women's sport at the elite level is captivating and deserves to be treated as such.

Sexism in sport was called out, the penny has finally dropped that it's not acceptable. A case in point is the fall out in Spanish football.

The fact that so many people men and women, young and old, in pubs, at workplaces, in family settings, at home have been talking about the athleticism, the tactics and women's sport at an elite level is a major breakthrough.

Example: Sports Fans – families, women and children feel included and safe

Trailblazing volunteers, administrators, coaches and athletes built these spaces for women and non-binary folk to play. But there are also passionate fans on the ground continuing to drive the fan culture.

One group bringing the noise the Women's World Cup is [Matildas Active Support](#), which states "inclusivity is at our core". The group coordinates meet-ups pre and post-match, leads chants at the games and brings fans together on social media. The group welcomes [everyone to their events](#), whether that be singing at the top of their lungs or quietly taking it all in.

Diverse fan support like this adds to the [family-friendly](#) atmosphere at women's football, where families with children feel more comfortable to attend, and women in particular [feel safe to attend matches alone](#).

It's important women athletes are visible in the media to show the next generation what is possible, and the Matildas are definitely achieving this. But the visibility of fandom and the culture that surrounds women's football is just as crucial to drive women's sport forward.

This Women's World Cup is an opportunity for stakeholders to learn more about the different ways fandom is experienced, and how to connect with diverse fans to continue to grow the audience beyond the tournament and in other women's sports.

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What's been clear over the last month is that record numbers of women's football fans have rejected traditional masculine forms of sporting fandom for more inclusive, safe, and friendly expressions.

These fans have been seen. They now must be heard to continue to build on this momentum for women's sport.

Example: Women athletes pay disparity

The rise and continued growth of professional women's competitions will likely see an increased opportunity for professional women Athletes to participate in a full-time capacity, with the number of women Athletes on the elite trajectory across multiple sports continuing to grow into the future.

The demand for TV broadcast rights and growing interest from sponsors will certainly lead to greater pay for professional women Athletes in the near future. Increased opportunities, and the likely increase in monetary and non-monetary incentives—with brands looking to get behind and align themselves with previously untapped markets—may see a rise in sport integrity matters being attributed to elite women's competitions. The desire to perform, and maintain a position within a team, may lead to an increased likelihood of Athletes doping or undertaking other activities which may otherwise compromise the integrity of the sport.

1.3 What are the great benefits that sport delivers that are at risk?

Implementing Safety In Sport will enable Sport Integrity Australia to enhance and adapt its capability and services to support people at all sporting levels to address matters of safety, including sexual misconduct, it will make sport safe. A safe sporting environment with attract and retain participants, with flow on benefits to the wider systems of health, economics, social and culture.

Green and gold decade of events – In addition to previous government announcements and funding commitments, the 2023-24 Budget announced funding to implement the Major Sporting Events Legacy Framework to ensure upcoming major international sporting events held in Australia deliver lasting social, economic, and sporting benefits for all Australians (\$0.2 million in 2023–24). The budget will also support the Confederation of Australian Sport's bid to host the World Masters Games 2029 in Perth (\$5 million over 3 years). The WMG is one of the largest international, multi-sport participation events in the world with more than 35,000 athletes competing in more than 50 sports, including para-sports.

With Australia hosting a range of international sporting events culminating with the 2032 Brisbane Olympics and Paralympics, Sport Integrity Australia's role has never been more important and provides a responsibility to be part of a legacy and the 'Win Well' ethos – it is critical we start the conversation and education at the grassroots level because today's five-year-old could be our 2032 Olympian¹⁵.

Benefits to Australia of these major events extend beyond the event itself. The 2021 submission titled *SPORT Powering Australia's future (10+10)* mapped a 10+10-year Sport Investment Plan deliberately calibrated to align with the government's longer term policy priorities in preventative health and 'generational' challenges such as childhood obesity, chronic disease, and youth mental health. While at the same time, mapping strategic connections with community infrastructure investment and major sporting events.

In his March 2023 address at the National Press Club, the CEO of the Australian Olympic Committee (AOC) Matt Carroll made the following headline comments that are aligned to the value of sport to the community '*...every national sports plan recognises the enormous value of sport in tackling the crises in obesity and chronic diseases including mental health problems. Plus, the value of sport in bringing communities together, creating social harmony, creating economic benefit, and helping a generation of young people negotiate the future. The investment benefits are universally acknowledged and yet the decline continues.*'

Research conducted by the Confederation of Australian Sport and by the Australian Sports Commission¹⁶ over the past 5 years show the enormous contribution that sport makes to the nation in many ways.

- 14 million Australians participate in sport annually, 1.8 million volunteer 158 million hours each year and 220,000 are employed across the sector.
- The sport industry generates an estimated \$83 billion in combined economic, health and educational benefits each year with a return over 17:1 on Government investment. This represents 3% of the nation's GDP.
- The research highlights the broader benefits that sport, and physical activity makes to individuals from a preventative health perspective and in contributing to positive attitudes and mental wellbeing (Figure 3)

¹⁵ SIA CEO David Sharp: Safety in Sport Division announcement (2 October 2022).

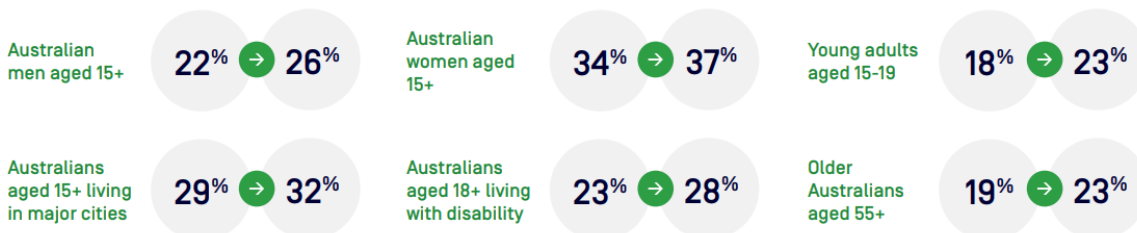
¹⁶ Confederation of Australian Sport_website [Welcome to The Confederation of Australian Sport - Sport CA \(sportforall.com.au\)](https://www.sportforall.com.au)

- Australian Sport is uniquely placed to reduce the unsustainably high levels of obesity and overweight and current provides over 50% of all moderate and vigorous physical activity undertaken by the population.
- Partner research with Deakin Health Economics shows that if physical inactivity was reduced by 15% over 5 years there would be a \$434m saving in health costs, 3,000 prevented deaths, 10,000 new cases of disease avoided and 3.3m Australians achieving the government's physical activity guidelines

Figure 5. Mental health statistics

Mental health is a common and growing driver of participation

From 2020-21 to 2021-22 there has been a significant increase in mental health as a participation motive for:



2. Why is Government action needed?

The Wood Review warned ‘without the presence of a comprehensive, effective and nationally coordinated response capability, the hard-earned reputation of sport in this country risks being tarnished’ and beyond the immediate impact of corrupt conduct of the kind identified, a public loss of confidence in the sporting contest has direct consequences for the health, economic, social and cultural benefits sports generate and undermines significant investment in sport’

The May 2023 ASF ‘*Clubs under Pressure*’ report has outlined the pressures, challenges and opportunities to improve participation and accelerate the benefits of sport. There 5 key challenges to community sport and grass roots participation. The ‘so what’ from these challenges is that sport has identified a list of top 5 priorities for funding, that identifies a clear opportunity for government to act through policy intervention and funding.

The priorities for funding, identified by sport, within the report are detailed:

1. Improved facilities and venues
2. Initiatives to keep teenagers in sport
3. Increase volunteer numbers
4. Expanding school programs
5. Talent identification across all communities.

The recent government announcement of the ‘*Play our Way*’ program has clearly acted in response to the number 1 priority of ‘improved facilities and venues’. The program will improve sporting facilities and equipment specifically for women and girls. It will create new opportunities for families and communities to come together by building safer, modern environments for women and girls to play sport.

The ASF’s August 2023 ‘*Running on Empty*’ report identified elite athlete funding priorities, with ‘initiatives to keep teenagers in sport’ as its No.3 priority.

Implementing Safety In Sport supports each of the 5 abovementioned priorities by fostering a safe and inclusive environment that encourages participants to start and stay in sport.

2.1 Why is it necessary to have a regulator?

Sports integrity matters are now beyond the control of any single stakeholder. They are complex, globalised and connected, forming a complicated threat matrix exposing vulnerabilities that require a robust and nationally coordinated response across sports, governments, regulators, the wagering industry, law enforcement and other stakeholders.

Industry cannot keep up with and respond to these threats. The gap will continue to widen between the current capacity to respond and the sophistication required to stay ahead of game. Regulation has provided a positive response in an environment where industry was unable to or did not adequately respond - having a detrimental and often lifelong effect on the people sport is here to protect. This has been evidenced by the systematic sexual abuse of US gymnasts and Sport Integrity Australia’s own review¹⁷ into gymnastics in Australia, the Royal Commission into Institutional Responses to Child Sexual Abuse and compensation to athletes for historical abuse.

Effective regulation and a proactive response to these threats will continue to grow athlete and community trust that Australia is a fair and safe sporting nation, to be proud of and participate in.

The answer to this question has already been considered, assessed, and decided upon through the *Review of Australia’s Sports Integrity Arrangements* (Wood Review) and subsequently addressed through the resultant commitment and actions from government.

The Wood Review is the most comprehensive examination of sports integrity arrangements ever undertaken in Australia. The Government’s response to the Wood Review demonstrates a commitment to comprehensively protecting the integrity of Australian sport for the benefit of the entire Australian community, requiring a strong and ongoing partnership with key sports integrity stakeholders. Implementing Safety In Sport will ensure that beneficiaries of the Government’s response, including

¹⁷ Western Australian Institute of Sport Women’s artistic gymnastics program review_20 April 2022

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states and territories and sports and wagering service providers, have the opportunity to work with the Australian Government to develop a sustainable framework and funding model to support Australia's national sport integrity response into the future.

Recommendation 40 of the Wood Review noted that Sport Integrity Australia should have three primary areas of focus:

- regulation
- monitoring, intelligence, and investigations
- policy and program delivery (including education, outreach, and development).

The Wood Review made a strong argument for Government action - a cohesive, well-resourced national level capability to effectively respond to escalating integrity risks. The Wood Review identified a critical leadership role for the Commonwealth Government by supporting the integrity efforts of sporting organisations in the evolving threat environment, particularly those sports with fewer resources. Support for government regulation and coordination is also referenced in the National Sports Plan, with 'Safeguarding the Integrity of Sport' one of four key pillars.

The Safety in Sport initiative further demonstrates Government commitment to protecting the physical and psychological safety of participants in sport. It was implemented to deal with a range of issues including discrimination based on race, culture, sexual and gender identity as well as abuse and mistreatment across all levels of Australian sport. It has expanded the capability of Sport Integrity Australia's existing 1800 hotline to include an anonymous reporting capability focusing on wider racial and cultural issues in sport and a broadening of the education platform to inform culturally sensitive issues.

To properly implement Safety in Sport Sport Integrity Australia has had to reduce, cease, or reprioritise other activities, noting that reprioritisation can only be a temporary solution, the presented options seek resources to continue this important work at the right level.

To address broader sports integrity issues, the Wood Review made several recommendations including Sport Integrity Australia.

- become responsible for centrally coordinating sports integrity policy
- administer a confidential reporting (whistle-blower) scheme encompassing all sports integrity issues, and a related source protection framework
- be a single point of contact for athletes, sporting organisations, Sports Wagering Service Providers (SWSP), and other stakeholders for matters relating to sports integrity,
- provide direct assistance to small and emerging sports in Australia that lack capacity to deal with integrity issues
- develop a single, easily identifiable education and outreach platform dedicated to developing and coordinating education, training and outreach resources and programs

Implementing Safety in Sport will support Sport Integrity Australia's role as a regulator in this space and give effect to the recommendations of the Wood Review.

In collaboration with partners, Sport Integrity Australia will take a leading role through activities and coordination efforts to address threats to sport integrity framed around a variety of intervention options and effective application of those options. These activities influence:

- deterrence – to discourage from acting or proceeding, for example, through targeted education and information
- disruption – to cause disorder to the normal continuance of something, for example, through investigation of sports integrity complaints or sharing of intelligence
- detection – to act upon instances of illegal or prohibited behaviour

Sport Integrity Australia has filled a significant gap for national sports and law enforcement partners who are not able to, independently, sometimes see the full sport safety and integrity picture. This unique and privileged perspective can help sports to respond to unseen threats through learning from issues in other sports that may provide early indication of threats to prepare for. Sport Integrity Australia is clearly aware that its effectiveness is contingent on impactful partnerships.

2.2 What are the objectives of Safety In Sport

2.2.1 A safe environment for all participants in sport

Success will be measured by an increasing percentage of sports capable of implementing a safe sporting environment for all participants, of all ages, across all levels of sport, with metrics to be set in 2024–25 once baseline data established. This will

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be achieved through delivering the Safeguarding in Sport Continuous Improvement Program (SISCIP) effectively and establishing measurement baseline for Children's Perception of Safety in Sport Research data.

2.2.2 Australians involved in sport understand, model and promote positive behaviours.

Success will be measured by an increasing number of education program completions resulting an increasing percentage of surveyed individuals involved in sport who understand and demonstrate positive behaviours across core sport integrity themes, child safeguarding and member protection. This will be achieved through designing a survey to measure behaviours in sport across core sport integrity themes, and delivering the survey to establish baselines for survey data.

2.2.3 Sporting activities in Australia are fair and honest

The agency will develop the Sport Integrity Threat Assessment process and build the capability of our intelligence analysts to conduct sport-specific assessments of the threat environment. It will focus on 5 sports in the first year and increase to 10 further assessments on other sports in subsequent years. Success will be measured by the strategies these sports already have in place to mitigate sport integrity threats prior to the threat assessments.

2.3 Barriers to success

The following discusses the risk to successful deliver of Safety In Sport objectives and the strategies we have or will put in place to mitigate these risks.

Core Risks:

Enterprise Operations, Service/program Delivery, Athletes and sporting community

Risk Mitigation Strategies:

- We are committed to delivering high-quality business outcomes and aim for improvement through ongoing monitoring of performance and evaluation.
- We develop policy based on research, data, engagement and evidence and map legislation to inform policy direction.
- We have dedicated resources within our agency to maintain the National Integrity Framework and provide funding to sports to implement the National Integrity Framework with a view to empowering sports to maintain the capability long term.
- We have integrity managers embedded in each sport as a key conduit into each sport to improve communication and stakeholder engagement.
- We have a dedicated communications section to synchronise and coordinate messaging to external stakeholders to ensure our approach is consistent.
- We have built in corporate reporting processes to account for our progress against government funded programs.

Core Risks:

Reputation, Ministers/Government, Regulated cohort, Partner organisations, Broader external stakeholders

Risk Mitigation Strategies:

- We are committed to upholding our reputation for integrity and providing professional, impartial and reliable advice and support to our stakeholders.
- We build and maintain strong and collaborative relationships with our stakeholders through regular engagement.
- We have a well-resourced section dedicated to international engagement and have established credibility and strong relationships on the global stage.
- We have a dedicated complaints handling team, with commitment to engage each complainant from start-to-finish.

Core Risks:

Legal and compliance, Governance, Regulation and legal, Fraud and corruption, Information systems and security

Risk Mitigation Strategies:

- We are committed to maintaining a strong and effective governance framework that provides assurance and supports compliance with our internal policies, procedures and delegation framework, further enabling our continuous improvement efforts.
- We protect the integrity of our payments to third parties by focusing on preventing inaccurate payments, fraud and corruption using a range of control measures.

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- Our risk, fraud, audit and assurance mechanisms support our system of monitoring and oversight.
- The protection of our information and data is safeguarded by robust systems, monitoring and oversight underpinned by our Information and Data Strategy, Digital Strategy and Security Strategy.
- We operate in a Protected environment and apply the Australian Cyber Security Centre's Essential Eight Mitigation Strategies to mitigate potential cyber threats to our organisation.
- We embed privacy awareness and manage our information appropriately under the Freedom of Information Act 1982 and the Privacy Act 1988. We meet best practice in records management and comply with our obligations under the Archives Act 1983.

2.4 Why is it necessary to fund Sport Integrity Australia?

Establishing Sport Integrity Australia was aimed at reducing the regulatory burden on sport, athletes and others who were previously required to interact with multiple agencies on matters across the sports integrity spectrum.

The fact that Sport Integrity Australia is now the national single point of reference for athletes, sporting organisations, regulatory agencies, law enforcement and intelligence bodies and other stakeholders for matters relating sports integrity after three short years is remarkable. To become *the* trusted partner responsible for delivering many of the key diverse functions impacting Australian sports including anti-doping, intelligence, investigations, policy delivery, education and capacity-building to ensure Australian sport is safe and fair is no mean feat.

A cessation of support from Sport Integrity Australia at any level would exacerbate the challenges faced by sport and further increase administrative load and associated cost burden, with a potential reduction in sport's ability to mitigate risks and deal with integrity matters effectively when they arise.

Sport Integrity Australia manages an agile and adaptive relationship among a diverse range of stakeholders as represented below.

Figure 6. Sport Integrity Australia stakeholders

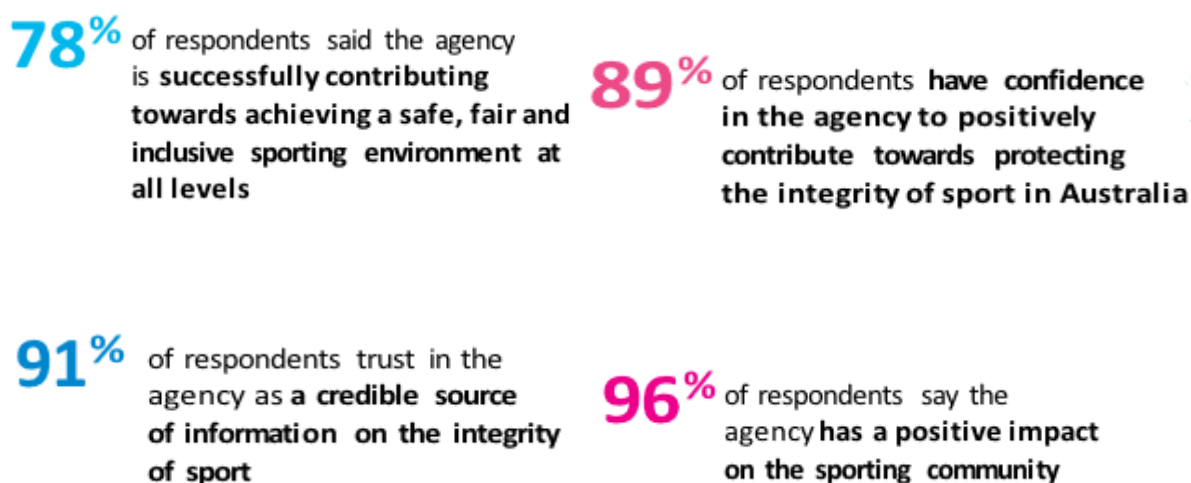


Government at all levels plays a leading role in enabling sport and sport related policies and programs. This includes the provision of support and funding to sporting organisations, clubs, and individuals. This includes being major investors and contributors to building and maintaining sports related infrastructure and sponsoring the hosting of major sports events.

The services delivered by Sport Integrity Australia to the sporting community is highly valued. This is evidenced through the results from Sport Integrity Australia's June 2022 annual stakeholder survey. It provides insights into the impact of our work. Headline results show the value of Sport Integrity Australia in delivering a safe and fair sporting environment.

Stakeholders continue to show a high level of awareness of Sport Integrity Australia and its role with 96% of respondents (compared with 98% last year) indicating a positive overall impact on the sporting community. The survey data show the majority (75% or greater) of stakeholders believe Sport Integrity Australia is making a positive contribution to achieving fair and honest sporting performances and outcomes, promoting positive conduct in sports, and protecting the integrity of sport.

Figure 7. stakeholder views



These results and engagement with sporting organisations demonstrate support of Sport Integrity Australia continuing its role as the national coordinator of sport integrity and safety, and in turn being provided funding to ensure its continued support and ability to deliver the essential enablers to sport.

The Wood Review highlighted the importance (recommendation 21) of ensuring Sport Integrity Australia is adequately resourced and financially sustainable, with enhanced capacity to engage with sports and be an effective and responsive regulator.

A funding model to support Safety In Sport

The proposed options will allow Sport Integrity Australia to enhance and adapt its capability and services to support people at all sporting levels to address matters of safety, including sexual misconduct. Sport Integrity Australia presents three options, to support wide reaching cultural change within sport and addresses critical capability gaps in the current system.

Implementing Safety In Sport will ensure Sport Integrity Australia is able to maintain an information triage, referral, and reporting service, complemented by the implementation of a new case management system. It will prevent these issues from reverting back to the sports, removing independence and potentially reducing the level of trust and engagement participants have in government and their sporting code.

Sport Integrity Australia has invested in a sports partnership capability to take a leadership role in capacity building, collaboration, and consultation, both nationally and abroad. Sport Integrity Australia engages with NSO/Ds to ensure that their contact with Sport Integrity Australia is responsive, timely and helpful. Sport Integrity Australia works directly with sport and appropriate subject matter experts to ensure they receive the necessary advice and support required. Each year, based on the outcomes of Sport Integrity Australia's Compliance Assessment and NSO Survey, an annual engagement plan is produced to assist sports to develop and enhance their integrity programs. In conjunction with this partnership capability is investment in National Integrity managers embedded within sports to implement and maintain policies and practices under the NIF and further improve on the level of engagement with sports participants.

One of Sport Integrity Australia's roles is to protect members of sporting organisations and other persons in a sporting environment from bullying, intimidation, discrimination, or harassment as it may relate to racism, sexism, disability or sexuality. Participants and sport at all levels are provided with education, training, and ongoing support to ensure organisations are equipped to provide safe and inclusive environments for all members, including children and young people. Participants can often feel overwhelmed, isolated, confused, and anxious when dealing with integrity matters. Sport Integrity Australia has a role to promote wellbeing and psychological health and support when people are engaged in such matters. This includes access to free, independent, and confidential counselling service with qualified professionals. In addition to this, Sport Integrity Australia has independent complaint handling model for child safeguarding and discrimination.

Sport Integrity Australia would prepare a strategy to improve diversity and cultural awareness and appreciation of integrity issues across the sporting environment and protect participants from integrity threats targeted at specific groups such as women and girls and First Nations sports participants and administrators. If funding reverts to pre-2018 levels, investment into research and programs aimed at identifying diversity threats and protecting participants once they enter the sporting environment will not be viable. For example, Sport Integrity Australia aims to reduce the risk of female athletes doping or becoming the subject of match fixing through targeted education and programs and breaking down the barriers of learning for multicultural participants by translating content or making it culturally appropriate.

The presented options will ensure strategic investment in our people, processes, and systems. Due to our temporary funding status over numerous years, we have been unable to offer ongoing staff placements which has presented attraction and

retention challenges for Sport Integrity Australia, and high administrative costs. When excluding casual staff involved in education and anti-doping operations, 30 per cent of Sport Integrity Australia's headcount is comprised of non-ongoing staff and labour hire contractors with almost 90% of these workers not contracted beyond 30 June 2024. Funding certainty will allow Sport Integrity Australia to offer ongoing employment, invest in a strategy for learning and development of a highly specialised workforce, ensure continuity of responsive and high-quality service delivery, and reduce the cost of high turnover and expensive labour hire contracts.

Opportunities

One clear opportunity is collaborative research and innovation to enhance knowledge and build capability to adapt and evolve to stay ahead of the ever-increasing volume and complexity of the threats facing sport integrity, including harmful behaviours against athletes such as online abuse (including child abuse).

Another opportunity is to strengthen collaborative efforts across law enforcement, intelligence, child protection and sport partnerships to identify intelligence threats, including discrimination and abuse, with a view to shaping collaborative proactive strategies and targeted actions. These opportunities span preparedness, education, integrity, and safety and include opportunities:

- in preparedness for major events and performance and criminal activity: across radicalisation and racism; transnational crime, drug importation and money laundering
- for safety: prevent and respond to child abuse and online safety.

Given the complexity of the challenges, the opportunity to leverage partnerships to contribute to a shared purpose is important.

Sport Integrity Australia produces several strategic threat assessments and will soon release its Annual Threat Assessment, in which the Child safeguarding threat level in sport has been assessed as High. In addition, First Nations people, those with a disability, people from culturally and linguistically diverse (CALD) backgrounds and those who identify as LGBTI+ remain particularly vulnerable to physical and emotional abuse and discrimination in the sporting domain.

There is an increasing benefit to share strategic intelligence with a range of partner agencies and sport to develop a shared understanding of integrity threats, and the resources to identify and address threats to keep sport safe and fair for all. This includes the need to improve access to data held by sport.

2.5 What is the current funding arrangement for Sport Integrity Australia?

Sport Integrity Australia does not have capacity to absorb the cost of the expanded remit of Safety in Sport within current funding. The presented options mitigate risks posed by the funding arrangements of Sport Integrity Australia post 30 June 2024, which provide no option for Sport Integrity Australia to maintain the required level of support to sports and participants.

The following is a discussion on the current funding arrangements for Sport Integrity Australia and the impact of terminating measures at 30 June 2024 presented in Table 2.

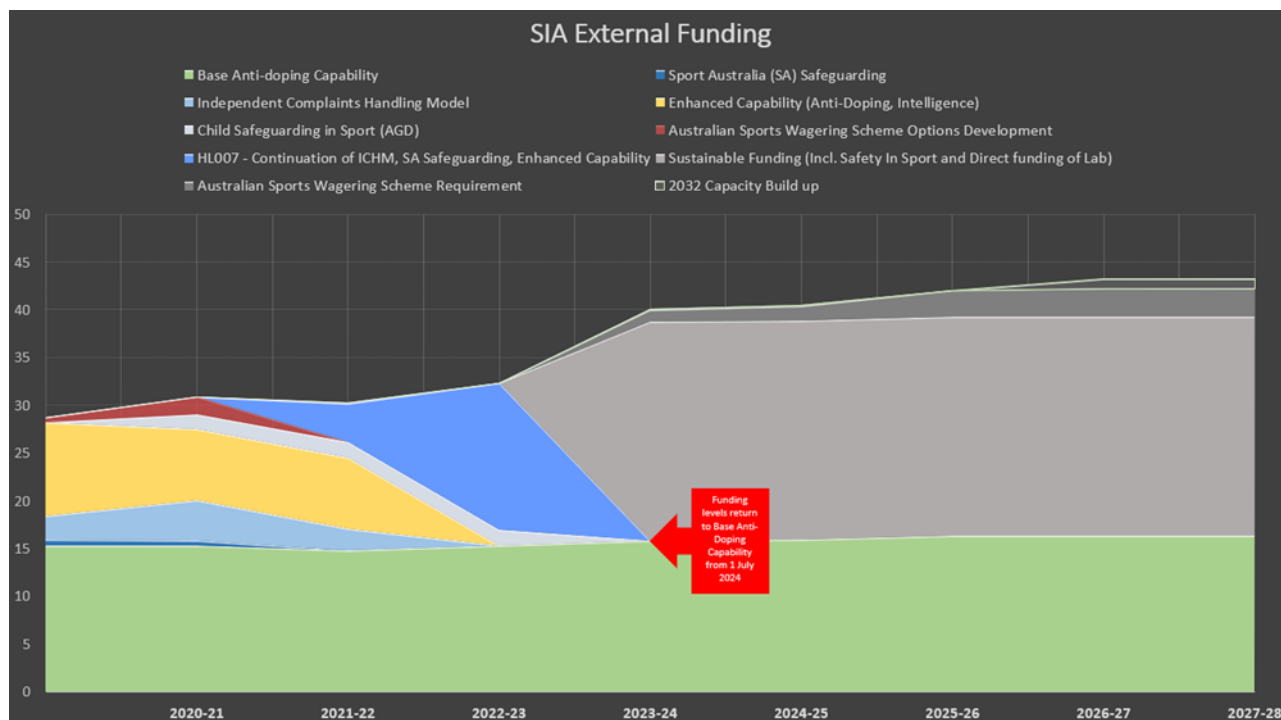
Agency activities are prioritised to ensure legislative requirements are met, including but not limited to.

- Sport Integrity Australia's obligation to perform its functions within the framework set out by the Act and *Sport Integrity Australia Regulations*
- the PGPA Act and other relevant government legislation

The presented options will ensure there is sufficient budget to improve the sport integrity landscape and adequately address emerging safety threats. We currently have numerous obligations and commitments to government, international organisations and sports that are impacted directly proportional to our funding levels, for example the funding of National Integrity Managers in sports.

Sport Integrity Australia has an ongoing appropriation of approximately \$15m per annum as represented in Figure 1 as 'Base Anti-doping Capability'. Over several years Sport Integrity Australia has sought approval for an ongoing funding model that better reflects the increased capability requirements as recommended in the Wood Review and address emerging integrity threats. The government has continued to provide temporary funding to Sport Integrity Australia, with existing measures due to terminate on 30 June 2024.

Figure 8. Sport Integrity Australia Funding



If funding returns to pre-2018 levels when were only an Anti-Doping agency (refer section ‘Where we were’) it will directly impact services delivered under the Safety in Sport initiative. Once obligations under the World Anti-Doping Code are met, along with other legislative compliance requirements, there will be little to no capacity to maintain or further invest in the framework that protects sport from the threats of abuse, discrimination, mistreatment, child safeguarding, racism, homophobia and gender equality across all levels of Australian sport, not just in the high-performance domain, to ensure all those involved in Australian sport feel safe, respected and culturally included.

In June 2021, Sport Integrity Australia undertook an Agency wide Cost Base and Funding Review to identify future resource requirements to deliver on all Government intended outcomes and ensure the long-term financial sustainability of Sport Integrity Australia and identify ongoing opportunities to uplift Sport Integrity Australia’s strategic financial and resource management practices to better support its Executive in decision making around priority activities and resource allocation.

To better understand Sport Integrity Australia’s costs, a high level Activity Based Costing (ABC) process was undertaken across Sport Integrity Australia. All Sport Integrity Australia activities were considered during this process, including the Independent Complaints Handling Model, the Confidential Reporting Scheme and the proposed Australian Sport Wagering Scheme (ASWS). All activities across Sport Integrity Australia were surveyed and assessed for alignment to Sport Integrity Australia’s strategic objectives, and to inform the requirements for new policy proposals and potential costs for recovery under the Australian Government’s Charging Framework (the Charging Framework).

To inform this assessment, one of the outcomes of the ABC exercise are discussed in Table 2, outlining the impact that terminating funding measures will have on the sporting ecosystem if funding returns to pre-2018 levels.

Table 2. Impact of terminating funding on the sport ecosystem

Program	Impact
Funding of the ACIC Australian Sport Intelligence Unit	Funding ceases: 30 June 2024 Ref: Wood Review Recommendation 1, 11, 46 Establishing a central information gathering, analysis and dissemination and coordination capability is critical to ensuring Australia’s response to match fixing is effective. To meet the requirements of Article 13 of the Macolin Convention, Sport Integrity Australia provides funding for the national platform delivered by the Australian Sport Intelligence Unit housed within the ACIC. Cessation of funding for secondees from the AFP and ACIC, Memorandums of Understanding with Law Enforcement on information sharing provisions, and the annual Law Enforcement Conference will impact the collaborative efforts and responsiveness and impact of the Law Enforcement referral process, particularly in child safeguarding and supply of PIEDs.

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Program	Impact
	Impact: Ratification of the Macolin Convention is at risk if the ASIU cannot be maintained or at an adequate level.
National Integrity Framework Independent Complaints Handling National and State Integrity Managers	Funding ceases: 30 June 2024 Ref: Wood Review Recommendation 47, 50, 51, 52 The National Integrity Framework incorporates critical capability including independent complaints handling and confidential reporting to ensure independence. The independent 'whistle-blower' service administered by Sport Integrity Australia is necessary for the confidential reporting of integrity threats by athletes and support personnel. Currently Sport Integrity Australia supports small and emerging sports in Australia that lack capacity to deal with integrity issues by providing various guidance and tools to assist with management and investigation of complaints including funding to support the embedding of Integrity Managers into National and State sporting bodies. Impact: Complaints handling, serious child safeguarding issues along with the associated investigations and welfare support will revert to sports, negatively impacting independence, transparency, and conflict of interest issues along with a loss of trust from the public in the adequate management of issues.
Enhanced Anti-doping capabilities	Funding ceases: 30 June 2024 Ref: Wood Review Recommendation 20, 52 Increased investments in Anti-doping education, collaborating to deliver more effective education and training packages with greater reach below national-level athletes, enhanced investigative capability through established collaboration with the sporting sector, guidelines for the conduct of Anti-doping investigations, strong information and intelligence sharing links with law enforcement agencies and regulatory agencies and streamlined enforcement and sanction process. Impact: activity will significantly reduce, and the Anti-doping program will return to pre-2018 activity levels, risking non-compliance with the 2021 World Anti-Doping Code, placing Sport Integrity Australia's role in the 2032 Olympics and Paralympics at serious risk.
Support to the Pacific International Contributions	Funding ceases: 30 June 2024 Australia's contribution to WADA is mandatory. This funding supports the operation of WADA to promote, coordinate and monitor the fight against drugs in sports and ensure a fair and equitable playing field for participants across the globe. Similarly, Australia contributes funding to UNESCO. UNESCO established the Voluntary Fund for the Elimination of Doping (Fund) in 2008 under Article 17 of the Convention and Australia has contributed annually since. The Fund assists less developed countries to create and implement effective Anti-doping programs. Since its establishment, the fund has provided financial assistance to more than 120 countries, for 200+ projects worth over \$5 million (USD). Australia's contribution to the Asia Pacific Region (ORADO) to improve the development of regional sport integrity capability which is a key priority of Sport Integrity Australia and the government in its broader Sports Diplomacy work. Australia's contributions to ORADO who advocates, promotes and coordinates the fight against doping in sport in all its forms in the Pacific. ORADO works at a national level to ensure all pacific nations implement national Anti-doping programs compliant with the WAD Code. At a regional level it coordinates an effective prevention, detection and deterrence doping control program among countries and promotes a culture where all stakeholders fully support the doping free sporting movement. Impact: Without funding Sport Integrity Australia will be required to absorb mandatory contributions into the operating budget by reducing activity and resourcing in other key functions. Voluntary support to UNESCO and ORADO will reduce or cease altogether which will significantly impact the development of regional capability.
Safeguarding and Child Safeguarding	Funding ceases: 30 June 2024 A key partnership with Attorney Generals as part of the government's National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030 achieved through the development of progressive Member Protection and Child Safeguarding policies and the provision of capability building support to sports. Impact: Safeguarding in Sport Continuous Improvement program will cease with safeguarding practices, policies and education responsibilities reverting to sports. The risk of harm to children and vulnerable athletes in sport will increase.
Play By The Rules Program	SIA Funding ceases: 30 June 2024 Ref: Wood Review Recommendation 20

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Program	Impact
	<p>Play by the Rules is a unique collaboration between Sport Integrity Australia, Sport Australia, the Australian Human Rights Commission, all state and territory departments of sport and recreation, all state and territory anti-discrimination and human rights agencies, the Office of the Children's Guardian (NSW) and the Anti-Discrimination Board of NSW. Play by the Rules provides information, resources, tools and free online training to increase the capacity and capability of administrators, coaches, officials, players, parents and spectators to assist them in preventing and dealing with discrimination, harassment, child safety, inclusion and integrity issues in sport.</p> <p>Impact: Sport Integrity Australia is currently the biggest contributor to the program by providing human resources to manage, oversee and coordinate the program. Without funding, Sport Integrity Australia contribution to the program will reduce significantly and place pressure on other partners to make additional contributions or risk deterioration of the program and subsequent increase in integrity issues at community and grass roots level.</p>
Australian Sports Drug Testing Laboratory	<p>Funding ceases: 30 June 2024</p> <p>Ref: Wood Review Recommendation 22</p> <p>Appropriation is provided directly to NMI to maintain the WADA accredited laboratory to carry out sample analysis, a requirement to host major sporting events, such as the Olympics, Commonwealth Games, FIBA World Cup and UCI events in Australia. Considering Australia's isolated location and stipulated turn-around times for sample analysis has meant that Australia has maintained this capability domestically.</p> <p>Impact: If the current funding arrangement was to cease, Sport Integrity Australia will need to absorb the cost of the ASDTL into its funding base. To accommodate these other key functions of Sport Integrity Australia will cease or be significantly reduced (for example intelligence functions, innovative education practices, funding for Integrity Managers) as a reprioritisation of remaining funding will be required to ensure WAD Code compliance.</p>

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3. What policy options are you considering?

As stated in the introduction, this Impact Analysis looks across the enhanced and diversified Safety In Sport proposal, with a number of genuine and alternative policy options presented below.

User Charging

The consideration of charging for the services, programs and deliverables of Sport Integrity Australia is framed against the following proposition:

1. The *Sport Integrity Act 2020* **only allows Sport Integrity Australia to charge for functions relating to Anti-doping.**
2. Current research and publicly available data confirm that if Sport Integrity Australia were to legislate or compel all NSO/Ds to use and pay for services in addition anti-doping, that they are not financially viable enough to absorb these costs. They would in turn pass on the cost in full to athletes, participants, and community sport – or request more funding from government (a circular proposition).

Even though the *Sport Integrity Australia Act 2020* does not provide options for cost recovery of Safety In Sport activities, this section presents the detail, evidence, and analysis to test the affordability argument.

Section 19 of the *Sport Integrity Act 2020* permits the CEO to charge fees for performing his or her functions under the NAD scheme, with functions and activities that can be and are currently charged for under the Charging Framework were reviewed in detail as part of the 2022 Portfolio Charging Review (PCR).

As part of the Environmental Scan undertaken by Sport Integrity Australia in 2022, it was identified that currently the only regulatory obligation relates to NSO/Ds with an Anti-doping policy compliant with the WAD Code, International Standards, and the NAD scheme (as stated under clause 2.04(a) of the NAD scheme).

The activities for which Sport Integrity Australia charge cannot be classified as a cost recovery levy or fee, however, could be considered as commercial charge under the Charging Framework as they are a service that are, or could be, available on a commercial arrangement.

Affordability of sport

NSO/Ds are ultimately representative of their community sporting clubs and participants. Two independent reports have outlined the financial pressure that sport is under at the grassroots level.

The May 2023 ASF report 'Clubs under Pressure'¹⁸ (informed by responses from almost 3,000 sporting clubs) found that challenging economic conditions have placed additional strain on community sporting clubs, already struggling with running costs, participation numbers and volunteers after COVID-19 and extreme weather events. It noted that rising costs and falling revenue are pushing almost one in five (18%) community sporting clubs to the brink of collapse. In the past year, smaller clubs in particular are feeling the greatest pressure, with one in four (24%) small community sporting clubs contemplating closing. Other key findings of this recent report were that:

- against a backdrop of rising inflation, 52% of clubs surveyed report cost of living impacts as a growing barrier to member registrations.
- more than two in three sporting clubs across Australia (68%) have experienced increased running costs, which is a substantial increase from 47% in 2021. For these clubs, running costs have increased on average by \$20,529.
- more than one in four (27%) clubs are also reporting a decline in registrations among 15–19-year-olds.

Whilst the September 2021 ASF report titled *Impact of Covid-19 on Community Sport*¹⁹ focused on the impact of COVID19, additional evidence through the ASC notes that NSO/Ds remain highly reliant upon government funding and support. In particular, the barriers identified by Member Sports (within the report) that continue to prevent them from improving participation outcomes include: (i) resources to deliver and innovate, with 82% of Member Sports surveyed indicated that insufficient resources to support capability and capacity of the sports was a key barrier to growing participation.

¹⁸ [Your Sport Your Say \(sportsfoundation.org.au\)](https://sportsfoundation.org.au)

¹⁹ <https://asf.org.au/news/the-impact-of-covid-19-on-community-sport-september-report-update>

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The report was based on a survey of 833 unique sporting organisations covering 94 different sports. The survey covered Small Local Clubs (<1,000 members and <\$250k in revenue) and Large Local Clubs (>1,000 members and >\$250k in revenue). A key findings from the report was that 83% of clubs reported lost revenue with average revenue losses of \$18.5k (Small Clubs down \$11k and Large Clubs down \$78k). Despite the revenue losses, 47% of clubs reported that running costs increased due to, among other things, setting up new ways to operate relating to Covid-19 protocols. The survey indicated 12% of clubs (equating to 9,000 Australia wide when extrapolated) are at risk of 'going under' with 50% of clubs reporting that their financial reserves had decreased.

Participation costs continue to rise across the board in a variety of sports, with 10% of surveyed participants borrowing money to participate in sport and 35% of respondents reporting greater credit card debt due to sporting fees.²⁰

In September 2021, The Australian Sports Foundation reported nearly 83% of community sports clubs surveyed reported lost revenue across sponsorships, fundraising and membership income. With minimal financial reserves, over 12% of clubs (approx. 9,000) express concern for ongoing financial risk with one in four small clubs considering closing due to financial pressures. Government grants are a primary source of income for many clubs.

Based on the Charging Framework, NSO/Ds are the sector creating the need for activities. The intent is to not have a detrimental impact on their financial viability or service offering, or flow on effect to registration fees of participants. The Charging Framework sets an outline to this section as '*...charging for a good or service may be inconsistent with the intended policy outcomes, such as the provision of community services or support*'.

Under this scenario, informed by open-source research, it is estimated the government funded NSO/Ds would pay approx. 70% of the total. The remaining would be paid by the AFL, NRL, Tennis Australia and Cricket Australia (27% - combined) and non-government funded NSO/Ds charged the remaining 3%. This is quantified in table 2.

Table 3. Percentage of active members

NSO/D groupings ²¹	% of total active members
Unfunded COMPPS: AFL, NRL, Tennis Australia and Cricket Australia	27%
Funded COMPPS: Netball Australia, Rugby Union Australia, and Football Australia	18%
Funded NSO/Ds	52%
Unfunded NSO/Ds	3%
Total	100%

1. Administrative NSO/D costs - on average it is expected to cost approx. 0.20 ASL per NSO/D to set up and maintain the cost recovery process via data collection on an annual basis (estimate of \$100k salary including superannuation per ASL). This calculates to 19ASL at a total annual cost of \$1.9m across all sports.
2. Administrative Agency costs - it is expected to cost approx. 1xAPS6 ASL for 12 months to set up the new process and 0.5 ASL to maintain it on an annual basis, costing \$175k in year one, then \$88k each year thereafter.

Publicly available research and reports supports the proposition that any impediment to participation, ergo increased registration and participant cost generated by user charging, adds little benefit back to the government bottom line (the circular funding argument) and will both directly and indirectly affect other government priorities across the areas of the economy, health and wellbeing, finance, and participation.

Barriers identified by Member Sports that continue to prevent them from improving participation outcomes include: (i) resources to deliver and innovate - 82% of Member Sports surveyed ²²indicated that insufficient resources to support

²⁰ Western Sydney University report undertaken in 2020

²¹ Source: ASC aggregated data

²² SPORT Powering Australia's future (10+10) May 2021

capability and capacity of the sports was a key barrier to growing participation. This is reflected in a decline of Sport Australia's participation base investment provided directly to Member Sports over the past 6 years from \$23.7m to \$16.9m.

To achieve this, not only does the role of sport need to be recognised more broadly across government, but the way in which sport is supported and funded needs to be fundamentally rethought. The elements that make up the sports industry, participation, high performance, and major events, can no longer be supported in isolation. NSO/Ds can no longer retrofit their business models to fit an outdated funding model.

In 2018, 2.5% of the total disease burden in Australia could have been avoided if all people in Australia were sufficiently active. Insufficient physical activity, when considered together with overweight and obesity prevalence, account for around 9% of the total disease burden in Australia—the same as tobacco smoking (the leading individual risk factor).²³

Status Quo - Basic Anti-Doping and Integrity Capabilities

As discussed in section 2.3 'Current funding arrangements for Sport Integrity Australia' and presented in Figure 8, maintaining status quo will see some 50% of the activities and staffing level of the agency are funded via measures that will terminate on 30 June 2024, reducing the agency budget from \$32.3m to \$15.8m. This reduction would see funding return to pre-2018 levels when the agency was only a National Anti-doping Organisation (NADO) without the expanded remit it has today. A funding reduction of this magnitude would see the agency unable to deliver on its obligations beyond a very basic Anti-doping and integrity capability.

From 2018-19 to date, Government has invested in the Anti-doping program to enhance engagement with sporting organisations and athletes to build a positive Anti-doping culture that values compliance with responsibilities, use innovation and technology to maximise engagement with sports and athletes, offer enhanced Anti-doping education and awareness-raising initiatives; and enhance intelligence capabilities to better protect sport from the risk of doping. This proposal seeks to maintain and further develop the existing level of Anti-doping capability of Sport Integrity Australia and the ASDTL to close the gap between current state and highly sophisticated doping practices.

As a NADO, the greatest risk to the agency is falling into a position that makes us non-compliant with the 2021 World Anti-Doping Code (WAD Code). This proposal will ensure the current level of Anti-doping capability does not significantly reduce with some activities ceasing altogether (for example face to face education, innovative online tools for athletes, use of sophisticated digital forensics capability, implementing the outcomes of research and strategic intelligence). Continued funding will mitigate the risk of potential non-compliance with the WAD Code – placing Australia's participation in and hosting of the 2032 Olympics and Paralympics at serious risk.

The International Standard for Code Compliance by Signatories is a mandatory International Standard developed as part of the World Anti-Doping Program. The purpose is to set out the relevant framework and procedures for ensuring 2021 WAD Code Compliance by signatories. Compliance requires the agency to ensure it has implemented and maintained standards at or above those specified in the following;

- International Standard for Testing and Investigations
- International Standard for the Protection of Privacy and Personal Information
- International Standard for Therapeutic Use Exemptions
- International Standard for Education
- International Standard for Results Management
- International Standard for Laboratories

WADA has the duty to constantly monitor Signatory Anti-doping rules, regulations, and legislation (when applicable) to ensure that they are in line with the Code and the relevant International Standards. Audits are conducted by trained individuals from WADA and external Anti-doping experts.

In October 2021 WADA found 5 Anti-Doping Organisations (ADOs) to be non-compliant with the WAD Code due to lack of full implementation of the 2021 version of the code within their legal system and non-conformities in implementing an effective testing program. WADA sent formal notices of non-compliance with 21 days for the ADOs to dispute WADA's assertion of non-compliance, as well as the proposed consequences and/or the reinstatement conditions proposed by the Agency. Consequences of non-compliance are detailed in the International Standard for Code Compliance by Signatories (ISCCS) and may include;

²³ Clearing house for sport

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- The Signatories' countries may not be awarded the right to host regional, continental or world championships, or events organized by Major Event Organizations, for the entire period of non-compliance (ISCCS Annex B.3.1(e.1)). ***This would be a direct impact on Australia's ability to host the myriad of major events during the Green and Gold decade.***
- Representatives will be excluded from participation in or attendance at the Olympic Games and Paralympic Games and/or any other multi-sports event for the next edition of that event (summer or winter, where relevant) or until reinstatement, whichever is longer (ISCCS Annex B.3.1 (f.2)). ***Non-Compliance would directly impact Australian elite athletes.*** This penalty has been applied to Deaf International Basketball Federation (DIBF) for their non-compliance and more prominently, Russian athletes during their results management and laboratory non-compliance.
- The Signatories are ineligible to host any event hosted or organized or co-hosted or co-organized by WADA (ISCCS Annex. B.3.1(a)). ***Australia hosted the World Education Conference in Sydney in September 2022 as organised by WADA, this would not have been possible if were deemed non-compliant.***
- The Signatories' representatives are ineligible to hold any WADA office or any position as a member of any WADA board or committee or other body (including but not limited to membership of WADA's Foundation Board, ExCo, Standing Committees, and any other committee) (ISCCS Annex. B.3.1(a)). ***The Australian Minister for Sport is currently a member of the WADA Foundation Board, with the Sport Integrity Australia Head of International Relationships & Strategy as supporting representative.***
- The Signatories' representatives will be ineligible to sit as members of the boards or committees or other bodies of any Signatory (or its members) or association of Signatories until the Signatory is reinstated or for a period of one year, whichever is longer (ISCCS Annex B.3.1 (d)). ***Several Sport Integrity Australia employees are currently members of WADA expert committees and boards, non-compliance would prevent these staff from positively influencing Anti-doping policy and governance of WADA.***

Central to the agency's role as a NADO is the capacity and capability to conduct sports drug testing and sample analysis in a cost effective and timely manner within Australia across all sporting codes and provide advice and assistance to counter the use of prohibited supplements.

As a Signatory, NADOs must use one of 30 WADA accredited laboratories across the globe to carry out sample analysis. This service is currently carried out by the ASDTL. A capability to conduct WADA Accredited sports drug testing in Australia is a requirement to host major international sporting events, such as the Olympics, Commonwealth Games, FIFA World Cup and UCI events.

This requirement stipulates a need to have access to sample analysis capability in a fast turnaround time. Considering Australia's isolated location, this has meant that Australia has maintained this capability domestically. For this reason, NMI also acts as an analysis service provider for other regional national sporting organisations, including the Pacific, and NADOs (such as Drug Free Sport New Zealand and the Oceania Region Anti-Doping Organisation).

As a government agency, activities will be prioritised to ensure legislative requirements are met. As Australia's NADO, the primary focus will be on trying to maintain a WAD Code compliant testing regime.

WADA is expected to engage and assess Australia's capability for sports drug testing on multiple occasions leading up to the 2032 Brisbane Olympics and Paralympics. Maintaining laboratory accreditation will be paramount, so under a status quo option Sport Integrity Australia will be required to allocate up to \$9 million of its remaining \$16 million appropriation to fund the laboratory.

Under the status quo option, ensuring Safety In Sport at all levels will be a light touch approach, with Sport Integrity Australia acting as a coordinator between participants, sport and law enforcement. This option will rely on participants and sports accessing information, education and frameworks previously developed by Sport Integrity Australia.

Functions of Sport Integrity Australia available under this option will be limited to ensuring Anti-doping activities of the National Anti-Doping Organisation (NADO) are prioritised, with coordination of other integrity matters significantly reduced or removed altogether. The programs, activities and services that will reduce or cease have been outlined in table 2. The Anti-Doping function would not evolve to be impactful in detecting, deterring or disrupting contemporary doping methodologies. It would also not be athlete informed, opportunities to develop less intrusive techniques and processes to ensuring athlete wellbeing at the core of the process, will be minimised.

Most integrity resources developed by Sport Integrity Australia over the past 3 years will be 'handed over' to NSOs/NSODs to implement and maintain. The responsibility to remain educated and deal with evolving integrity matters will revert to the sports.

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Beyond the government commitments and responsibilities emanating from the Wood Review already implemented, no further work would continue in this regard nor would this option ensure the government's priorities, including the Green and Gold decade of events, are fully and effectively delivered.

Sport Integrity Australia's role as a national coordinator in bringing together integrity managers across all sports and also leveraging and collaborating with Commonwealth agencies on behalf of sports, such as the eSafety Commissioner, ABF, ACIC and the AFP and state and territory law enforcement will be limited to none.

The following presents three realistic options for consideration to implement Safety In Sport, with increasing levels of capability, noting each option includes all activities provided in preceding options.

Funding Options

The options presented in this section are to fund the Safety In Sport Initiative, which will complement existing integrity functions of Sport Integrity Australia.

In his letter of 29 September 2022, the Prime Minister the Hon Anthony Albanese MP, supported the announcement of the Safety in Sport initiative. He also outlined that if Sport Integrity Australia required expanded scope or additional funding, that Sport Integrity Australia comeback with a detailed proposal. The evolving threats within the Australian sports ecosystem and growing demand for Sport Integrity Australia's services support the implementation of Safety In Sport.

Funding is required by government to implement Safety In Sport functions and continue to be the national coordinator charged with the protection of the integrity of sport and the health and welfare of those who participate in it.

To improve safety among at risk groups

Each option provides funding to address integrity issues faced by First Nations peoples, women and girls and those from CALD backgrounds. Among these groups the participation rate in organised sports in Australia, for both adults and children is generally lower than in the wider population. The lower rate can be attributed to socio-economic factors, higher levels of discrimination as well as disadvantage created by location and access to programs and facilities.

Each option would address these impacts through a Sport Culture and Diversity Strategy to implement immediate and impactful change. It would outline a long-term vision of greatly improving cultural awareness of integrity issues and the level of acceptance of diversity and inclusion in the sporting ecosystem. The medium and high options provide funding to support this strategy through specialist staff seconded from the offices of the AHRC, child safe protection agencies and the eSafety Commissioner.

To provide evidence-based policies, programs and services

The high option provides funding for establishment of the Sport Integrity Research Institute through partnering with Australian universities would provide a better understanding of current and emerging threats that are, or would, impact the sporting ecosystem. It would provide evidenced based input to improve the athlete experience through changes to the agency's policies, programs, capabilities and services which will better equip sports, administrators and participants against these challenges.

Early focus of the Institute would be to explore whether safety, integrity and cultural issues are barriers to women and girls, First Nations people, those from a CALD background or other at-risk groups to entering and continuing in sport. It would inform both the empowering the voice of women and girls in sport initiative, and the First Nations skills program. It would also identify the next tranche of integrity focused actions for the agency and sport to remove such barriers. Research has shown that Aboriginal and Torres Strait Islander youth who participate in sport are 3.5 times more likely to report good general health and less likely to have serious mental health issues.

Proactively partnering with women and girls initiatives across government and sport to ensure integrity issues impacting women and girls in sport are embedded into each, bringing critical mass to achieve change, spanning online abuse, discrimination, child safeguarding, competition manipulation and anti-doping. Driving research in partnership to understand and treat integrity threats and challenges to achieve our collective goal of a safe and fair environment is a critical element.

To ensure all participants of sport are informed, educated and supported

Education is key to raising awareness of and deterring inappropriate behaviour in sport. Each option supports Sport Integrity Australia to enhance and diversify its education offerings, so they are enabled by the latest innovation and technology, to remove any cultural and multinational barriers and reach children and young people through age-appropriate content and face-to-face and online methods. In three years, Sport Integrity Australia has educated almost 300,000 people and developed more than 100 education resources, but the demand continues to increase. The education function was set up for anti-doping

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information and resources to athlete and sports, but with the introduction of the NIF this education role has increased exponentially.

The high option will fund State/Territory Integrity Managers to be embedded in peak state/territory sporting bodies. These resources will drive the implementation of consistent safe sport integrity policies and processes, with state level support specifically requested by Community Sport Australia members and their CEOs across state/territory level sport.

3.1 Option 1 (Low) – Safety In Sport

As discussed in section 2.3 'Current funding arrangements for Sport Integrity Australia' and presented in Figure 8, maintaining status quo will see agency funding reduce by 50% on 30 June 2024, removing any ability for Sport Integrity Australia to maintain an adequate level of oversight and coordination of integrity matters beyond doping. Sport Integrity Australia's priority will revert to an Anti-doping focus and provide basic, light touch integrity capability with most of the responsibility for these matters reverting to sports.

Under a status quo scenario, Sport Integrity Australia must prioritise compliance with the WAD Code and other legislation (for example PGPA), with any remaining funding allocated to addressing integrity matters beyond doping. Sport Integrity Australia would primarily focus on elite athletes and the Anti-doping environment in which they compete, with a light touch approach adopted to protecting the mental and physical safety of sports participants at all levels. The option will provide Sport Integrity Australia limited resources to support athletes and upcoming athletes with issues around gender diversity or First Nations participation and will provide little capacity to reach community and grass roots participants.

In comparison, this low option seeks \$27.9m over 4 years with ongoing funding of \$7.9m per annum, to provide the minimum level capability required to deliver services within the Safety in Sport initiative and National Integrity Framework. This option will allow Sport Integrity Australia to adequately address current safety in sport issues beyond Anti-doping, providing participants with a level of trust in independent process, knowledge that their sporting club has access to resources, and an expectation that government and sport will appropriately address and manage integrity issues.

There will be significant investment into programs targeted at female and First Nations participation and sharing outcomes of success in our expanded remit with international stakeholders and our Pacific partners.

Key highlights of this option include:

- Enhancements to the existing Safe Sport hotline, information triage, referral and reporting service to ensure the agency can appropriately respond to increasing volumes of complaints and reports associated with bullying, harassment, racism and discrimination. This will be achieved through;
 - implementing a new intuitive, user-friendly, feature-rich Case Management system to underpin triage, assessment, review, investigation and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping.
 - operationalising the agency's Wellbeing Capability Framework by providing care (through training or an appropriate support service) to those experiencing a traumatic event; listen to, view, or read descriptions about traumatic events; or experience, witness, or investigate traumatic events.
- Enhanced and expanded education content to cover bullying, harassment, discrimination and emerging safety issues, with innovative delivery methods and increased accessibility (including a Child-safe website) to reach all levels of sport. There will be a focus on educating women and girls who, in a previously male dominant arena, may not have had or been given the opportunity to receive education on sport integrity matters. There will be a review of all material to ensure it is culturally sensitive and appropriate to the needs of First Nations People and CALD participants.
- Development and implementation of a First Nations skills program to understand and address disparities in participation and administration across sport, so Aboriginal and Torres Strait Islander people are welcomed and feel safe in the sporting ecosystem.
- Development and implementation of the Empowering Women and their voice in sport initiative to include concepts such as agency placements/internships/shadow a CEO and influencing a positive shift in the culture of Sporting Boards and CEOs to attract, retain and promote women leaders in sport. Promoting diversity in leadership is a key step towards addressing the integrity issues facing women in girls as it provides a voice to this cohort of participants.
- Development and implementation of a Sport Culture and Diversity Strategy which will inform policies, programs and services delivered by the agency. Led by the agency's Culture and Safety Advisor and an Advisory Committee to provide representation of the different Indigenous cultures across Australia.

Key initiatives and activities that this option will fund include (but not limited to):

- 25 highly trained and specialised staff for Sport Integrity Australia to;

- Manage and maintain a triage, referral and reporting service for complaints/reports relating to integrity matters received into Sport Integrity Australia including; preliminary assessment to determine if in-scope or out-of-scope and identify next steps, conduct integrity Investigations, staff assessment and review capability, training, development of procedures, provide tactical intelligence support (at a case level) for Integrity matters
- Conduct Education Outreach events (major events) and face to face education sessions, provide products and services to athletes to assist them to understand expanded integrity matters through external communication, events management and design and create education resources, manage education delivery to athletes and support personnel.
- Coordinate cross-agency collaboration initiatives, activities and relationships to deliver services and information to National Sporting Organisations (NSOs/NSODs) for NIF and child safeguarding practices, compliance and Reporting (Sports Engagement), relationship management and coordination with each of the NSO's (Sports Engagement), resource Identification and delivery coordination for NSO's (Sports Engagement)
- Capability Development Hub, coordinate cross-agency collaboration initiatives, activities and relationships to deliver cutting edge capabilities and processes to improve the effectiveness of Sport Integrity Australia.
- Digital Content & Social Media staff to cover the management of digital services, including social media and website resources. These resources are instrumental communications channels for the younger and mobile-savvy audience Sport Integrity Australia predominantly services.
 - Advisory Committee to support the Cultural Advisor and Cultural Diversity Hug providing representation of the different indigenous cultures across Australia (WA/NT/SA/Tas, NSW, QLD, VIC) and informing policy changes.
 - Communication campaigns including but not limited to highlighting and addressing racism in sport, increased awareness on Safety in Sport and the National Integrity Framework.
 - Wellbeing and psychologist support services for staff, athletes and support personnel.
 - Interpreter services relating to investigation interviews
 - Education and training - ongoing development and maintenance of e-learning products, online courses, education programs and Child-safe website
 - Case management system - intuitive, user-friendly, feature-rich system to underpin triage, evaluation, investigation, and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping. The efficient and effective management of operational information is critical to Sport Integrity Australia’s ability to support the management of and reporting on information and cases/matters. An Information Case Management solution which supports Sport Integrity Australia end to end operations is at the foundation of effective management and reporting for Sport Integrity Australia.

Table 4. fiscal impact of Option 1 (Low) – Safety In Sport

Funding	2023-24 \$m	2024-25 \$m	2025-26 \$m	2026-27 \$m	Total \$m
Safety In Sport	4.5	7.5	7.6	7.7	27.3
Charging Revenue	-	-	-	-	-
Total Fiscal Impact	4.5	7.5	7.6	7.7	27.3

These figures were derived from Sport Integrity Australia activity-based costing model discussed in section 2.3

3.2 Option 2 (Medium) – Safety In Sport

As discussed in section 2.3 ‘Current funding arrangements for Sport Integrity Australia’ and presented in Figure 8, maintaining status quo will see agency funding reduce by 50% on 30 June 2024, removing any ability for Sport Integrity Australia to maintain an adequate level of oversight and coordination of integrity matters beyond doping. Sport Integrity Australia’s priority will revert to an Anti-doping focus and provide basic, light touch integrity capability with most of the responsibility for these matters reverting to sports.

Under a status quo scenario, Sport Integrity Australia must prioritise compliance with the WAD Code and other legislation (for example PGPA), with any remaining funding allocated to addressing integrity matters beyond doping. Sport Integrity Australia would primarily focus on elite athletes and the Anti-doping environment in which they compete, with a light touch approach adopted to protecting the mental and physical safety of sports participants at all levels. The option will provide Sport Integrity Australia limited resources to support athletes and upcoming athletes with issues around gender diversity or First Nations participation and will provide little capacity to reach community and grass roots participants.

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In comparison, this medium option will provide a sufficient level of staffing resources and expertise to proactively address current and future safety in sport issues and implement robust frameworks that prevent integrity issues including new and emerging threats.

The option will provide participants with a high level of trust in independent process and a mechanism for confidential reporting of integrity issues. Participants will be confident that extended support is being provided to their sporting club by way of innovative education resources tailored to their needs, qualified personnel to manage integrity policy and manage issues as they arise.

There will be significant investment into programs targeted at female and First Nations participation and sharing outcomes of success in our expanded remit with international stakeholders and our Pacific partners.

In addition to capabilities delivered in the low option, this option seeks \$39.9m over 4 years with ongoing funding of \$11.3m per annum, and provides the following targeted initiatives and additional capacity:

- To enhance online safety and human rights in sport and ensure agency policies and products are well informed, development and implementation of a strategy to share specialist skillsets from law enforcement, the eSafety Commissioner and AHRC through consultation, partnership, information sharing capability or secondment arrangements
- A sports cultural hub and media studio that recognises and promotes First Nations peoples, those from culturally and linguistically diverse (CALD) backgrounds and people with a Disability in sport through accessible technology suitable for interviews, podcasts and broader communication on safe, fair sport
- New social media analytics capability to provide a complete picture of all of Sport Integrity Australia's social media efforts including; effectively identify trends and sentiments, monitor channels, sources and influencers, as well as audience affinities and; complement intelligence efforts by building intelligence profiles, track keywords, hashtags, and phrases, as well as set up notifications for new mentions or conversations
- New strategic intelligence capability to strengthen our understanding of key issues impacting the sports integrity threat environment, now and on the horizon. It will provide an evidence base to underpin an efficient, effective approach to deterring, disrupting, and detecting threats.
- As a result of the agency's expanded remit, this proposal would provide additional staff to;
 - o uplift existing legal expertise to deal with increasingly complex matters
 - o undertake additional engagement, information sharing, and communication activities to proactively respond to the increased volume and complexity of integrity matters

Key initiatives and activities that this option will fund include (but not limited to):

- 37 highly trained and specialised staff for Sport Integrity Australia to provide an uplift in legal expertise, strategic intelligence capability and enhanced engagement, information sharing, and communication for the activities discussed in the low option.
- Investment in innovative education tools to properly reach and educate participants is how Sport Integrity Australia will stay relevant, with education a key to raising awareness of and deterring inappropriate behaviour. Sport Integrity Australia needs to continually enhance its education offering to include the latest technology, remove cultural and multinational barriers and reach young people through relevant content and on trend methods.
- Adequate resources to identify, establish and maintain productive working relationships with key external partners and stakeholders (outside of NSO/Ds) across the sporting community and state and territory governments to inform agency outcomes. Investment in engagement and information sharing through advisory and working groups, conferences, surveys, MOUs, and the like is critical to ensuring Sport Integrity Australia provides what stakeholders need and partner together with state and territory governments to achieve a common goal.
- Adequate relationship management and coordination with each of the NSO/Ds is achieved through investment in people that can relate to the sports and their individual needs and circumstances and translate that into how Sport Integrity Australia should respond and can assist.

Table 5. fiscal impact of Option 2 (Medium) – Safety In Sport

Funding	2023-24 \$m	2024-25 \$m	2025-26 \$m	2026-27 \$m	Total \$m
Safety In Sport	6.0	11.0	10.9	11.0	38.9
Charging Revenue	-	-	-	-	-

Total Fiscal Impact	6.0	11.0	10.9	11.0	38.9
These figures were derived from Sport Integrity Australia activity-based costing model discussed in section 2.3					

3.3 Option 3 (High) – Safety In Sport

As discussed in section 2.3 ‘Current funding arrangements for Sport Integrity Australia’ and presented in Figure 8, maintaining status quo will see agency funding reduce by 50% on 30 June 2024, removing any ability for Sport Integrity Australia to maintain an adequate level of oversight and coordination of integrity matters beyond doping. Sport Integrity Australia’s priority will revert to an Anti-doping focus and provide basic, light touch integrity capability with most of the responsibility for these matters reverting to sports.

Under a status quo scenario, Sport Integrity Australia must prioritise compliance with the WAD Code and other legislation (for example PGPA), with any remaining funding allocated to addressing integrity matters beyond doping. Sport Integrity Australia would primarily focus on elite athletes and the Anti-doping environment in which they compete, with a light touch approach adopted to protecting the mental and physical safety of sports participants at all levels. The option will provide Sport Integrity Australia limited resources to support athletes and upcoming athletes with issues around gender diversity or First Nations participation and will provide little capacity to reach community and grass roots participants.

In comparison, this high option will equip government and sporting bodies with the optimal level of staffing resources and expertise to proactively address current and future safety in sport issues.

A superior level of investment will be made in research to understand the needs of participants at all levels and define the response required from government and sporting organisations to implement robust and fit for purpose frameworks to prevent integrity issues including new and emerging threats.

Participants and the public will have a high level of trust in independent and confidential reporting of integrity issues. Participants will be confident that a high level of support is being provided to their sporting club by way of innovative education resources tailored to their needs, qualified personnel to implement integrity policy and appropriately and effectively manage issues as they arise.

There will be significant investment into programs targeted at female and First Nations participation and sharing outcomes of success in our expanded remit with international stakeholders and our Pacific partners.

In addition to capabilities delivered in the low and medium options, this option seeks \$49.2m over 4 years with ongoing funding of \$14.0m per annum and provides investment in:

- New Integrity managers embedded within state/territory sports and representation agencies of Community Sport Australia to ensure safe sport policies and practices are implemented at the community level, where the impact is the greatest and most complaints derive from.
- Fund the establishment of a new Sport Integrity Research Institute (\$1.0 million per annum) through partnering with Australian Universities to better understand and provide informed solutions to address abuse, mistreatment, child protection and racism across all levels of Australian sport. This will ensure agency programs and services are both contemporary and fit for purpose and ensure evidence-based policy advice and development. In addition, research will inform the medium to long term future of the First Nations skills program and Empowering Women and their voice in sport initiative.
- Additional staff capacity to develop national and international partnerships to build a contemporary view and strategies to address evolving issues in sport, such as concussion, para classification, esports and transgender inclusion.

This option underpins recent government announcements to increase participation and to expand the appeal of sport within society. Without implementing one of the proposed options, these initiatives will have limited impact as the safety and experience of new entrants into sport will not improve.

Key initiatives and activities that this option will fund include (but not limited to).

- 43 highly trained and specialised staff for Sport Integrity Australia to provide an uplift in legal expertise, strategic intelligence capability and enhanced engagement, information sharing, and communication for the activities discussed in the low/medium options.
- **Research** - Fund the establishment of a Sport Integrity Research Institute through partnering with Australian Universities to better understand and provide informed solutions to address abuse, mistreatment, child protection and racism across all levels of Australian sport. This will ensure agency programs and services are both contemporary and fit for purpose and ensure evidence-based policy advice and development. This is discussed in detail in the section ‘Where we need to be’.

- **Culture** - Review overarching cultural, policy and process concerns within individual sports - participants and sport at all levels are provided with education, training, and ongoing support to ensure organisations are equipped to provide safe and inclusive environments for all members, including children. Young athletes grow up through sport understanding that abuse, sexism, racism, exploitation, and cheating are not acceptable. It is an upfront investment to reduce the likelihood of abuse and harm in sport, as exemplified through the recent public settlement of historical AIS psychological harm claims.
- **Education** - Investment in innovative education tools to properly reach and educate participants is how Sport Integrity Australia will stay relevant, with education a key to raising awareness of and deterring inappropriate behaviour. Sport Integrity Australia needs to continually enhance its education offering to include the latest technology, remove cultural and multinational barriers and reach young people through relevant content and on trend methods.
- **Engagement** - Adequate resources to identify, establish and maintain productive working relationships with key external partners and stakeholders (outside of NSO/Ds) across the sporting community and state and territory governments to inform agency outcomes. Investment in engagement and information sharing through advisory and working groups, conferences, surveys, MOUs, and the like is critical to ensuring Sport Integrity Australia provides what stakeholders need and partner together with state and territory governments to achieve a common goal.
- **Sport Partnerships** - Adequate relationship management and coordination with each of the NSO/Ds is achieved through investment in people that can relate to the sports and their individual needs and circumstances and translate that into how Sport Integrity Australia should respond and can assist.
- **Government Partnerships** - Participating in interagency projects will ensure Sport Integrity Australia remains informed about what is happening across government and the world, contribute to successful outcomes and minimise the risk of critical elements for which we hold the expertise being overlooked in major projects.
- **Efficiencies** - Targeted investment in internal process improvements and efficiencies will ensure Sport Integrity Australia can respond to issues in an appropriate and timely manner. Investment in technology and process improvements will streamline information flow, collate data in a meaningful way, enable Sport Integrity Australia to respond quickly and protect the wellbeing of athletes and sports participants.

Table 6. fiscal impact of Option 3 (High) – Safety In Sport

Table 6. fiscal impact of Option 3 (High) – Safety In Sport					
Funding	2023-24 \$m	2024-25 \$m	2025-26 \$m	2026-27 \$m	Total \$m
Safety In Sport	7.3	13.6	13.5	13.7	48.1
Charging Revenue	-	-	-	-	-
Total Fiscal Impact	7.3	13.6	13.5	13.7	48.1

These figures were derived from Sport Integrity Australia activity-based costing model discussed in section 2.3

4. What is the likely net benefit of each option?

The following is a discussion on who is likely to be affected by the regulatory options and the economic, competition, social, environmental, or other costs and benefits, as well as how those costs and benefits are likely to be distributed.

Where available, information to quantify both the benefits and costs (including regulatory costs) of the presented options and alternative options on businesses, community organisations, individuals, the broader community, the environment, and Government to a level of detail commensurate with impact has been included.

As cost recovery/user charging is not currently an option under the Sport Integrity Australia Act 2020, net benefits have not been considered in more detail here. This discussion was presented in section 3.1.

Status Quo - Basic Anti-Doping and Integrity Capabilities

	Positive impact	Negative impact
Government	<p>cost saving of over \$16m in terminating funding can be reprioritised by government</p> <p>remaining funding will be used to retain Sport Integrity Australia's core Anti-doping and integrity capabilities (at a reduced level)</p> <p>Australia's financial contribution to WADA is mandatory, this contribution will be prioritised from the agency budget to maintain an accredited NADO status</p>	<p>the agency will need to absorb the cost of the ASDTL into its funding base. To accommodate these other key functions of the agency will cease or be significantly reduced (for example intelligence functions, innovative education practices, funding for Integrity Managers) as a reprioritisation of remaining funding will be required to ensure WAD Code compliance.</p> <p>Anti-doping program will return to pre-2018 activity levels, risking non-compliance with the 2021 World Anti-Doping Code, placing Sport Integrity Australia's role in the 2032 Olympics and Paralympics at serious risk. Refer section 3 Status Quo - Basic Anti-Doping and Integrity Capabilities for evidence on the negative impact this would have on Australia.</p> <p>increased number and amount of ASC grants required to fund NSO/D integrity and safety programs that will no longer be delivered by Sport Integrity Australia. This will be in excess of \$2m currently provided by Sport Integrity Australia to fund National Integrity Managers.</p> <p>Without a focus on safety in sport there will be an indirect impact to other government priorities such mental health, obesity, equality, and diversity, participation</p>
NSO/Ds	<p>decreased government regulation and compliance requirements</p>	<p>inability to respond in a timely manner to ADRVs or other matters with increased risk and consequence of negative media</p>
SSO/sporting clubs	<p>NSO/Ds would be covered under existing legislations and laws (at both the state and federal level) across work health and safety; anti-discrimination; child protection; common law; industrial relations; and criminal law.</p>	<p>loss of trust and negative public perception of sport as an equitable and safe place, leading to decreased participation and loss of income to the economy</p> <p>Sport Integrity Australia will be required to absorb mandatory contributions into the operating budget by reducing activity and resourcing in other key functions. Voluntary support to UNESCO and ORADO will reduce or cease altogether which will significantly impact the development of regional capability.</p>
Participants and community	<p>none identified outside of the assessed high risk of WAD non-compliance and Australia's ability to host the 2032 Games</p>	<p>Ratification of the Macolin Convention is at risk if the Sports Betting Intelligence Unit cannot be maintained or at an adequate level. Establishing a central information gathering, analysis and dissemination and coordination capability is critical to ensuring Australia's response to match fixing is effective and avoid a repeat of incidents such as the 2018 Australian ball-tampering scandal - a cricket cheating scandal surrounding the Australian National Cricket team to manipulate the match by attempting to alter the condition of the ball. This incident raised questions about Australia's commitment to fair play in sport.</p> <p>Complaints handling, serious child safeguarding issues along with the associated investigations and welfare support will revert to sports, negatively impacting independence, transparency, and conflict of interest issues along with a loss of trust from the public in the adequate management of issues. Exemplified by the Sexual abuse of minors in sporting environments as demonstrated in the 2020 Australian Human Rights Commission report into Australian gymnastics. The report painted a picture of a sport with systemic risks to children of physical, psychological, and sexual abuse at all levels of the sport. The Royal Commission into Institutional Responses to Child Sexual Abuse underlined the need for an ongoing commitment to protecting children in sporting environments</p> <p>Children's experiences of sport in Australia - Overwhelmingly, young people reported the lasting developmental benefits of participation in organised sport as children. More than 50% also reported negative experiences, including emotional</p>

and physical harm and sexual harassment. - [Children's experience of sport in Australia | Request PDF \(researchgate.net\)](#)

Victoria University study suggests children experience high rates of violence in community sport - [Victoria University study suggests children experience high rates of violence in community sport - ABC News](#)

significant additional cost, resources, and implementation lag to establish and maintain individual integrity and safety programs, significant cost relating to legal and investigative capabilities within NSO/D and SSOs and sporting clubs

insufficient education and research into barriers of entry including diversity and culture

agency contribution to the Play By The Rules program will reduce significantly and place pressure on state government partners to make additional contributions or risk deterioration of the program and subsequent increase in integrity issues at community and grass roots level

anticipated increase to sport participation registration fees, varying from sport to sport, dependent on the financial position of the sport and how much of the regulatory cost the sport wishes to pass on

decreased participation due to decreased safety and integrity programs and education

Overall assessment	Under a status quo scenario, Sport Integrity Australia must prioritise compliance with the WAD Code and other legislation (for example PGPA), with any remaining funding allocated to addressing integrity matters beyond doping. Sport Integrity Australia would primarily focus on elite athletes and the Anti-doping environment in which they compete, with a light touch approach adopted to protecting the mental and physical safety of sports participants at all levels. The option will provide Sport Integrity Australia limited resources to support athletes and upcoming athletes with issues around gender diversity or First Nations participation and will provide little capacity to reach community and grass roots participants.
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Regulatory burden estimate (RBE) table

The total annual ongoing cost of maintaining a highly effective Safety In Sport regime is represented in Option 3 (High) Safety In Sport at approximately \$14 million per annum. A status quo scenario will provide Sport Integrity Australia with nil funding to address Safety In Sport leaving the full \$14 million to be funded by individuals, businesses or community organisations should they/government wish to accommodate an appropriate level of Safety In Sport. This would be achieved through investment of their own time and resources funded via government grants, business income, or personal income/time, noting cost recovery and charging options are currently unavailable for Safety In Sport under the *Sport Integrity Australia Act 2020*.

Sport Integrity Australia's ABC process was used to determine the percentage of Safety In Sport activities (at a high level) as a proportion of total agency activity and used to apportion residual regulatory costs per the table below.

The burden has been approximately distributed across the groups based on who would be most likely to invest their own time/resources if they had to or chose to. The distribution assumption is based on experience of Sport Integrity Australia to date in handling integrity matters, understanding of the sporting landscape and the feedback and engagement it has with these groups.

Average annual regulatory costs				
Change in costs (\$ million)	Individuals	COMPPs/Businesses/State Government	Non-COMPPs and community sport	Total change in cost
NSO and athlete engagement, products and services including education		\$4.2m	\$0.4m	\$4.6m
Strategic level engagement, intelligence		\$1.8m		\$1.8m
Providing safe and independent service channels for sporting participants	\$0.2m	\$0.6m	\$0.6m	\$1.4m
Building and Maintaining Cultural Integrity and Inclusion	\$0.2m	\$1.6m	\$0.2m	\$2.0m
International Engagement and partnerships		\$0.6m		\$0.6m
Identify and report on issues, trends and impacts to sport		\$1.2m		\$1.2m
Management of externally focused		\$0.2m		\$0.2m

Average annual regulatory costs				
programs (Play by the Rules)				
Information Coordination and triage	\$0.2m			\$0.2m
Research		\$2.0m		\$2.0m
Total, by sector	\$0.6m	\$12.2m	\$1.2m	\$14.0m

4.1 Option 1 (Low) – Safety In Sport

	Positive impact	Negative impact
Government	Minimum level of support to sport to address matters of safety, abuse, mistreatment, child protection, racism and sexual misconduct, addressing public expectation and demonstrating government commitment. Evidence to support public confidence in our response to these issues can be found in our stakeholder survey which identified 89% of respondents have confidence in the agency to positively contribute towards protecting the integrity of sport in Australia.	Agency 'outreach' limited to NSO/Ds. While we have supported 100 NSOs in implementing the National Integrity Framework and supported 19 National Integrity Managers, investment in Sporting Clubs and making a greater impact at the grassroots and community level is not supported by this option. Throughout the rollout of the National Integrity Framework, stakeholders from right across Australia provided regular feedback that integrity resources were much needed at the State and Territory level. Stakeholders advised that understanding and implementation of the Framework at that level and down to grassroots was problematic. As such, the policies were not adequately covering and protecting participants at all levels of sport.
NSO/Ds	Enhancement to Safesport Hotline, information triage, referral and reporting service including independent confidential reporting mechanism - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, the agency has managed over 1200 allegation-based integrity matters with over 70% related to Child safeguarding and member protection. Over 100 matters have resulted in educative action or an investigation with 44 substantiated breaches of integrity policy. The AHRC independent report into Gymnastics further demonstrated the need for Government assistance in addressing these issues by stating '...reported concerns about current processes for investigating and reporting child abuse and neglect, misconduct, bullying, sexual harassment and assault, citing confidentiality and a lack of transparency, lack of independence, fear of retribution and limited opportunities to escalate complaints or to have decisions reviewed'.	Increased reliance on other government funding for sport to deliver where there is a shortfall in safety and support programs. Sport in Australia is heavily reliant upon funding from government grants, Government (Australian, state/territory, and local) invests over AU\$1.3b annually in sport at all levels.
SSO/Sporting Clubs	Case Management system to underpin triage, assessment, review, investigation and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping. The new system will remove lack of consistency and complex, inefficient processes that currently exist with disparate systems, and facilitate an efficient and streamlined process with participant wellbeing at the forefront.	Insufficient resources available in SIA develop national and international partnerships to build a contemporary view and strategies to address evolving issues in sport, such as concussion, para classification, esports and transgender inclusion. This works interdependently with research outcomes. An example of where these emerging safety in sport issues are being highlighted is in the AHRC independent review into gymnastics where it was found that '...the structure and expectations of the sport, including rigorous training loads for athletes from a young age, can heighten the vulnerability of athletes participating in the sport. The Commission also heard about a range of experiences of abuse and other harmful behaviours, including emotional and verbal abuse, physical abuse and medical negligence , sexual abuse, negative weight management practices and body shaming. The short and long-term impacts of these practices were reported to be profound, with recent former gymnasts and gymnasts who last trained in the 80s, 90s and 2000s sharing their experiences with the Review'.
Participants and community	Child safety will remain a priority and assist the government in addressing recommendations from the royal commission. Through the National Integrity Framework we have supported more than 100 NSOs in developing and adopting best practice integrity policies. The agency has completed its annual threat assessment 'Australia: threats to sport integrity, 2023-24', in which the Child safeguarding threat level in sport has been assessed as High, demonstrating a need for continued action.	
	Sport integrity and safety guided at a national level, partnering with state and territory law enforcement through MOUs. Over 170 matters have been referred to law enforcement for consideration of action demonstrating the success of this partnership in addressing safety in sport matters.	
	Education developed by qualified people with content that covers safety in sport issues and enhanced to consider culture, diversity, inclusion – with greater reach and impact. Our stakeholder survey identified 91% of respondents trust the agency as a credible source of information on the integrity of sport. In 3 years the agency has educated almost 300,000 people and developed more than 100 education resources, demonstrating a need for this level of support	
	Communications are culturally appropriate and promote diversity in participation across all groups with input to policy from agency cultural advisor. 3,880 mentions of Sport Integrity Australia in the media over the last 12 months with a potential reach of 151,824,480 people demonstrates the	

importance of agency communication.

Understanding and ability to address disparities in participation and administration across sport, so women and girls, First Nations people, and participants with a disability or from culturally and linguistically diverse (CALD) backgrounds feel safe and included. In Australia, research on gender, sexism and homophobia in sport indicates that homophobia and sexism are significant stressors for LGBTIQ+ people within community sport. The National LGBTI Health Alliance found 56 percent of all participants and 72% of gay men believe homophobia is more common in Australian sport than the rest of society.

The need for a coordinated response by government and sport to achieve racial justice in sport can be demonstrated by the callout from AFL star [Joel Wilkinson](#).

Eighty-two per cent of people sampled in a 2022 study conducted by Victoria University have reported experiencing at least one form of interpersonal violence when participating in community sport as a child, [the study](#) sought to break down children's experiences of violence by who perpetrated it, including peers and parents as well as coaches. This breakdown showed that 73% of respondents experienced violence from their peers, followed by coaches (60 per cent) and parents (35 per cent). 76% experienced psychological violence, 66% physical and 38% sexual.

Only light touch outreach from SIA via limited face to face education sessions, communications products

Programs and support not informed by adequate levels of contemporary research leading to outdated materials and methods and increased cost of administration. [Research will not extend beyond anti-doping or sports betting](#)

Overall assessment	This option will allow Sport Integrity Australia to adequately address safety in sport issues beyond Anti-doping, providing participants with a level of trust in independent process, knowledge that their sporting club has access to resources, and an expectation that government and sport will appropriately address and manage safety in sport integrity issues. The option will adequately address critical capability gaps in the current integrity system by expanding the agency's remit to address the threats of bullying, harassment, racism, discrimination, violence and sexual misconduct; provide a system that supports wide reaching cultural change within sport; and make sport safe for all participants from community and grassroots level to elite, protecting participants with disability, (including women, girls and First Nations people with disability), with focused initiatives for women and girls, First Nations people, and participants from culturally and linguistically diverse (CALD) backgrounds
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Regulatory burden estimate (RBE) table

The total annual ongoing cost of maintaining a highly effective Safety In Sport regime is represented in Option 3 (High) Safety In Sport at approximately \$14 million per annum. The low options will provide Sport Integrity Australia with approximately \$7 million per annum, leaving the residual \$7 million to be funded by individuals, businesses or community organisations should they/government wish to maintain the existing level of Safety In Sport activity. This would be achieved through investment of their own time and resources funded via government grants, business income, or personal income/time, noting cost recovery and charging options are currently unavailable for Safety In Sport under the *Sport Integrity Australia Act 2020*.

Sport Integrity Australia's ABC process was used to determine the percentage of Safety In Sport activities (at a high level) as a proportion of total agency activity and used to apportion residual regulatory costs per the table below.

The burden has been approximately distributed across the groups based on who would be most likely to invest their own time/resources if they had to or chose to. The distribution assumption is based on experience of Sport Integrity Australia to date in handling integrity matters, understanding of the sporting landscape and the feedback and engagement it has with these groups.

Average annual regulatory costs				
Change in costs (\$ million)	Individuals	COMPPs/Business/State Government	Non-COMPPs and community sport	Total change in cost
NSO and athlete engagement, products and services including education		\$2.1m	\$0.2m	\$2.3m
Strategic level engagement, intelligence		\$0.9m		\$0.9m
Providing safe and independent service channels for sporting participants	\$0.1m	\$0.3m	\$0.3m	\$0.7m
Building and Maintaining Cultural Integrity and Inclusion	\$0.1m	\$0.8m	\$0.1m	\$1.0m
International Engagement and partnerships		\$0.3m		\$0.3m

Average annual regulatory costs				
Identify and report on issues, trends and impacts to sport		\$0.6m		\$0.6m
Management of externally focused programs (Play by the Rules)		\$0.1m		\$0.1m
Information Coordination and triage	\$0.1m			\$0.1m
Research		\$1.0m		\$1.0m
Total, by sector	\$0.3m	\$6.1m	\$0.6m	\$7.0m

4.2 Option 2 (Medium) – Safety In Sport

	Positive impact	Negative impact
Government NSO/Ds SSO/Sporting Clubs Participants and community	<p>To enhance online safety, complaint management practices and human rights in sport and ensure agency policies and products are well informed, develop and implement a strategy to share specialist skillsets from law enforcement, the eSafety Commissioner and AHRC through consultation, partnership, information sharing capability or secondment arrangements. Cyber bullying is part of many athletes' daily lives. A study conducted by World Athletics during the Tokyo Olympic Games revealed alarming levels of abuse of athletes, including sexist, racist, transphobic and homophobic posts, and unfounded doping accusations. This report further demonstrates that existing safeguarding measures on social media platforms need to be tougher to protect athletes. Under this option, the positive impact from partnerships with eSafety and AHRC will be achieved through supporting sport in their efforts strengthening safeguarding policies.</p> <p>A sports cultural hub and media studio that recognises and promotes First Nations peoples, those from culturally and linguistically diverse (CALD) backgrounds and people with a Disability in sport through accessible technology suitable for interviews, podcasts and broader communication on safe, fair sport. The hub will support the successful delivery of other interdependent initiatives and facilitate discussion and consultation on issues such as sports access barriers for First Nations peoples and other groups with lower participation, target increased participation in sport, support for First Nations peoples in positions of leadership and authority, such as decisionmakers, referees, coaches and managers to enhance cultural safety and First Nations empowerment across sports, encouraging inclusivity and anti-discrimination.</p> <p>An adequate level of support to sport to address matters of safety, abuse, mistreatment, child protection, racism and sexual misconduct, addressing public expectation and demonstrating government commitment. Evidence to support public confidence in our response to these issues can be found in our stakeholder survey which identified 89% of respondents have confidence in the agency to positively contribute towards protecting the integrity of sport in Australia.</p> <p>Enhancement to Safe sport Hotline, information triage, referral and reporting service including independent confidential reporting mechanism - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, the agency has managed over 1200 allegation-based integrity matters with over 70% related to Child safeguarding and member protection. Over 100 matters have resulted in educative action or an investigation with 44 substantiated breaches of integrity policy. The AHRC independent report into Gymnastics further demonstrated the need for Government assistance in addressing these issues by stating '...reported concerns about current processes for investigating and reporting child abuse and neglect, misconduct, bullying, sexual harassment and assault, citing confidentiality and a lack of transparency, lack of independence, fear of retribution and limited opportunities to escalate complaints or to have decisions reviewed'.</p> <p>Case Management system to underpin triage, assessment, review, investigation and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping. The new system will remove lack of consistency and complex, inefficient processes that currently exist with disparate systems, and facilitate an efficient and streamlined process with participant wellbeing at the forefront.</p> <p>Child safety will remain a priority and assist the government in addressing recommendations from the royal commission. Through the National Integrity Framework we have supported more than 100 NSOs in developing and adopting best practice integrity policies. The agency has completed its annual threat assessment 'Australia:</p>	<p>Agency 'outreach' limited to NSO/Ds. While we have supported 100 NSOs in implementing the National Integrity Framework and supported 19 National Integrity Managers, investment in Sporting Clubs and making a greater impact at the grassroots and community level is not supported by this option. Throughout the rollout of the National Integrity Framework, stakeholders from right across Australia provided regular feedback that integrity resources were much needed at the State and Territory level. Stakeholders advised that understanding and implementation of the Framework at that level and down to grassroots was problematic. As such, the policies were not adequately covering and protecting participants at all levels of sport.</p> <p>Insufficient resources available in SIA develop national and international partnerships to build a contemporary view and strategies to address evolving issues in sport, such as concussion, para classification, esports and transgender inclusion. This works interdependently with research outcomes. An example of where these emerging safety in sport issues are being highlighted is in the AHRC independent review into gymnastics where it was found that '...the structure and expectations of the sport, including rigorous training loads for athletes from a young age, can heighten the vulnerability of athletes participating in the sport. The Commission also heard about a range of experiences of abuse and other harmful behaviours, including emotional and verbal abuse, physical abuse and medical</p>

threats to sport integrity, 2023-24', in which the Child safeguarding threat level in sport has been assessed as High, demonstrating a need for continued action.

Sport integrity and safety guided at a national level, partnering with state and territory law enforcement through MOUs. Over 170 matters have been referred to law enforcement for consideration of action demonstrating the success of this partnership in addressing safety in sport matters.

Education developed by qualified people with content that covers safety in sport issues and enhanced to consider culture, diversity, inclusion – with greater reach and impact. Our stakeholder survey identified 91% of respondents trust the agency as a credible source of information on the integrity of sport. In 3 years the agency has educated almost 300,000 people and developed more than 100 education resources, demonstrating a need for this level of support

Communications are culturally appropriate and promote diversity in participation across all groups with input to policy from agency cultural advisor. 3,880 mentions of Sport Integrity Australia in the media over the last 12 months with a potential reach of 151,824,480 people demonstrates the importance of agency communication.

Understanding and ability to address disparities in participation and administration across sport, so women and girls, First Nations people, and participants with a disability or from culturally and linguistically diverse (CALD) backgrounds feel safe and included. In Australia, research on gender, sexism and homophobia in sport indicates that homophobia and sexism are significant stressors for LGBTIQ+ people within community sport. The National LGBTI Health Alliance found 56 percent of all participants and 72% of gay men believe homophobia is more common in Australian sport than the rest of society.

The need for a coordinated response by government and sport to achieve racial justice in sport can be demonstrated by the callout from AFL star [Joel Wilkinson](#).

negligence, sexual abuse, negative weight management practices and body shaming. The short and long-term impacts of these practices were reported to be profound, with recent former gymnasts and gymnasts who last trained in the 80s, 90s and 2000s sharing their experiences with the Review'.

Programs and support not informed by adequate levels of contemporary research leading to outdated materials and methods and increased cost of administration. [Research will not extend beyond anti-doping or sports betting](#)

Weighting and overall assessment	This option will provide a sufficient level of staffing resources and expertise to proactively address current and future safety in sport issues and implement robust frameworks that prevent integrity issues including new and emerging threats. The option will provide participants with a high level of trust in independent process and a mechanism for confidential reporting of integrity issues. Participants will be confident that extended support is being provided to their sporting club by way of innovative education resources tailored to their needs, qualified personnel to manage integrity policy and manage issues as they arise. There will be significant investment into programs targeted at female participation and sharing outcomes of success in our expanded remit with international stakeholders and our Pacific partners.
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Regulatory burden estimate (RBE) table

The total annual ongoing cost of maintaining a highly effective Safety In Sport regime is represented in Option 3 (High) Safety In Sport at approximately \$14 million per annum. Under the medium option, Government will provide Sport Integrity Australia with approximately \$10 million per annum, leaving the residual \$4 million to be funded by individuals, businesses or community organisations should they/government wish to maintain the existing level of Safety In Sport activity. This would be achieved through investment of their own time and resources funded via government grants, business income, or personal income/time, noting cost recovery and charging options are currently unavailable for Safety In Sport under the *Sport Integrity Australia Act 2020*.

Sport Integrity Australia's ABC process was used to determine the percentage of Safety In Sport activities (at a high level) as a proportion of total agency activity and used to apportion residual regulatory costs per the table below.

The burden has been approximately distributed across the groups based on who would be most likely to invest their own time/resources if they had to or chose to. The distribution assumption is based on experience of Sport Integrity Australia to date in handling integrity matters, understanding of the sporting landscape and the feedback and engagement it has with these groups.

Average annual regulatory costs				
Change in costs (\$ million)	Individuals	COMPPs/Business/State Government	Non-COMPPs and community sport	Total change in cost
NSO and athlete engagement including education, safeguarding/NIF, NIMs, SIMs		\$0.9m	\$0.1m	\$1.0m
Strategic intelligence		\$0.7m		\$0.7m
Providing safe and independent service channels for sporting participants	\$0.1m	\$0.3m	\$0.2m	\$0.5m

Average annual regulatory costs				
(ICHM, Confidential Reporting)				
Building and Maintaining Culture and Diversity in Sport	\$0.1m	\$0.2m	\$0.1m	\$0.4m
International and National Engagement, partnerships, Information sharing		\$0.2m		\$0.2m
Identify and report on issues, trends, and impacts to sport		\$0.0m		\$0.0m
Management of externally focused programs (Play by the Rules)		\$0.0m		\$0.0m
Information Coordination and triage	\$0.1m			\$0.1m
Research		\$1.0m		\$1.0m
Total, by sector	\$0.3m	\$3.3m	\$0.4m	\$4.0m

4.3 Option 3 (High) – Safety In Sport

	Positive impact	Negative impact
Government	<p>A superior level of support to sport to address matters of safety, abuse, mistreatment, child protection, racism and sexual misconduct, addressing public expectation and demonstrating government commitment. Evidence to support public confidence in our response to these issues can be found in our stakeholder survey which identified 89% of respondents have confidence in the agency to positively contribute towards protecting the integrity of sport in Australia. Agency 'outreach' will be extended to State and Territory levels to supplement the positive impact the existing support at the National level has had. As evidenced, we have supported 100 NSOs in implementing the National Integrity Framework and supported 19 National Integrity Managers, investment in Sporting Clubs and making a greater impact at the grassroots and community level will be supported by this option. Throughout the rollout of the National Integrity Framework, stakeholders from right across Australia provided regular feedback that integrity resources were much needed at the State and Territory level. Stakeholders advised that understanding and implementation of the Framework at that level and down to grassroots was problematic.</p> <p>Fund the establishment of a new Sport Integrity Research Institute (\$1.0 million per annum) through partnering with Australian Universities to better understand access barriers for First National people and other groups with lower participation as they relate to safety in sport issues of abuse, mistreatment, child protection and racism across all levels of Australian sport and provide informed solutions. This will ensure agency programs and services are both contemporary and fit for purpose and ensure evidence-based policy advice and development. In addition, research will inform the medium to long term future of the First Nations skills program and Empowering Women and their voice in sport initiative. The positive impact of existing research partnerships such as the UC partnership with Sport Integrity Australia to research the impacts of cyberbullying on women in sport is evidenced by the interdependent partnership the agency had with eSafety to develop cyber education for sports. Early focus of the Institute would be to explore whether safety, integrity and cultural issues are barriers to women and girls, First Nations people, those from a CALD background or other at-risk groups to entering and continuing in sport. It would inform both the empowering the voice of women and girls in sport initiative, and the First Nations skills program. It would also identify the next tranche of integrity focused actions for the agency and sport to remove such barriers. Research has shown that Aboriginal and Torres Strait Islander youth who participate in sport are 3.5 times more likely to report good general health and less likely to have serious mental health issues.</p> <p>To enhance online safety, complaint management practices and human rights in sport and ensure agency policies and products are well informed, develop and implement a strategy to share specialist skillsets from law enforcement, the eSafety Commissioner and AHRC through consultation, partnership, information sharing capability or secondment arrangements. Cyber bullying is part of many athletes' daily lives. A study conducted by World Athletics during the Tokyo Olympic Games revealed alarming levels</p>	<p>research provides insight and evidence into areas that have not yet been explored, highlighting new or emerging issues that sport are yet to deal with. Increased cost, increased resource requirements</p>

of abuse of athletes, including sexist, racist, transphobic and homophobic posts, and unfounded doping accusations. This report further demonstrates that existing safeguarding measures on social media platforms need to be tougher to protect athletes. Under this option, the positive impact from partnerships with eSafety and AHRC will be achieved through supporting sport in their efforts strengthening safeguarding policies.

A sports cultural hub and media studio that recognises and promotes First Nations peoples, those from culturally and linguistically diverse (CALD) backgrounds and people with a Disability in sport through accessible technology suitable for interviews, podcasts and broader communication on safe, fair sport. The hub will support the successful delivery of other interdependent initiatives and facilitate discussion and consultation on issues such as sports access barriers for First Nations peoples and other groups with lower participation, target increased participation in sport, support for First Nations peoples in positions of leadership and authority, such as decisionmakers, referees, coaches and managers to enhance cultural safety and First Nations empowerment across sports, encouraging inclusivity and anti-discrimination.

Enhancement to Safe sport Hotline, information triage, referral and reporting service including independent confidential reporting mechanism - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, the agency has managed over 1200 allegation-based integrity matters with over 70% related to Child safeguarding and member protection. Over 100 matters have resulted in educative action or an investigation with 44 substantiated breaches of integrity policy. The AHRC independent report into Gymnastics further demonstrated the need for Government assistance in addressing these issues by stating '...reported concerns about current processes for investigating and reporting child abuse and neglect, misconduct, bullying, sexual harassment and assault, citing confidentiality and a lack of transparency, lack of independence, fear of retribution and limited opportunities to escalate complaints or to have decisions reviewed'.

Case Management system to underpin triage, assessment, review, investigation and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping. The new system will remove lack of consistency and complex, inefficient processes that currently exist with disparate systems, and facilitate an efficient and streamlined process with participant wellbeing at the forefront.

Child safety will remain a priority and assist the government in addressing recommendations from the royal commission. Through the National Integrity Framework we have supported more than 100 NSOs in developing and adopting best practice integrity policies. The agency has completed its annual threat assessment 'Australia: threats to sport integrity, 2023-24', in which the Child safeguarding threat level in sport has been assessed as High, demonstrating a need for continued action.

Sport integrity and safety guided at a national level, partnering with state and territory law enforcement through MOUs. Over 170 matters have been referred to law enforcement for consideration of action demonstrating the success of this partnership in addressing safety in sport matters.

Education developed by qualified people with content that covers safety in sport issues and enhanced to consider culture, diversity, inclusion – with greater reach and impact. Our stakeholder survey identified 91% of respondents trust the agency as a credible source of information on the integrity of sport. In 3 years the agency has educated almost 300,000 people and developed more than 100 education resources, demonstrating a need for this level of support

Communications are culturally appropriate and promote diversity in participation across all groups with input to policy from agency cultural advisor. 3,880 mentions of Sport Integrity Australia in the media over the last 12 months with a potential reach of 151,824,480 people demonstrates the importance of agency communication.

Understanding and ability to address disparities in participation and administration across sport, so women and girls, First Nations people, and participants with a disability or from culturally and linguistically diverse (CALD) backgrounds feel safe and included. In Australia, research on

gender, sexism and homophobia in sport indicates that homophobia and sexism are significant stressors for LGBTIQ+ people within community sport. The National LGBTI Health Alliance found 56 percent of all participants and 72% of gay men believe homophobia is more common in Australian sport than the rest of society.

The need for a coordinated response by government and sport to achieve racial justice in sport can be demonstrated by the callout from AFL star [Joel Wilkinson](#).

Weighting and overall assessment

This option will equip government and sporting bodies with the optimal level of staffing resources and expertise to proactively address current and future safety in sport issues. A superior level of investment will be made in research to understand the needs of participants at all levels and define the response required from government and sporting organisations to implement robust and fit for purpose frameworks to prevent integrity issues including new and emerging threats. Participants and the public will have a high level of trust in independent and confidential reporting of integrity issues. Participants will be confident that a high level of support is being provided to their sporting club by way of innovative education resources tailored to their needs, qualified personnel to implement integrity policy and appropriately and effectively manage issues as they arise. There will be significant investment into programs targeted at female and First Nations participation and sharing outcomes of success in our expanded remit with international stakeholders and our Pacific partners.

Regulatory burden estimate (RBE)

The total annual ongoing cost of maintaining a highly effective Safety In Sport regime is represented by this option. Government will provide Sport Integrity Australia with approximately \$14 million per annum, therefore under this option there is no residual regulatory burden required to be funded by individuals, businesses, or community organisations.

5. Who did you consult and how did you incorporate their feedback?

Sport Integrity Australia views consultation with key stakeholders as a continuous process. Consultation on integrity issues within the sporting ecosystem and options to address these threats began as early as the Wood Review. A taskforce was set up to consult with other regulatory agencies and sporting stakeholders to develop the Government's response to the Wood Review and an implementation plan. Consultation continued through all stages of the implementation cycle, and as new integrity issues emerged, Sport Integrity Australia responded by working with industry stakeholders and government partners to develop strategies, including the three proposed options to address Safety In Sport.

Sport Integrity Australia consulted and continues to consult on policy advice with the Government and the relevant regulators to ensure that regulations can be administered in a manner that is consistent with the Government's intent. This has been demonstrated through our MOU's with state and territory law enforcement on information sharing partnerships.

Some of the groups that helped the agency form the proposed options are discussed below.

5.1 Current Consultation

Annual Threat to Sport Integrity Conference

Sport Integrity Australia's annual Threats to Sport Integrity conference was held in Brisbane in May 2023, an opportunity for the agency to strengthen and expand its partnerships and to plan. The conference was co-hosted by Queensland Police and featured representatives from 27 law enforcement, intelligence, regulatory and safeguarding agencies from around Australia.

Agencies represented included the National Office for Child Safety, NSW Department of Communities and Justice, [Australian Catholic University](#), [Department for Education, Children and Young People](#), Sport and Recreation Victoria, [Department of Local Government, Sport and Cultural Industries](#), [Basketball Australia](#), [AusCycling](#), Women's Sports Academy (Qld), [Australian Border Force](#), Australian Criminal Intelligence Commission, [Australian Federal Police](#), [eSafety Commissioner](#), [Australian Department of Foreign Affairs and Trade](#), [Australian Department of Home Affairs](#), [NSW Crime Commission](#) and law-enforcement representatives from all states and territories.

The aim of the conference was to build a strong, cohesive framework that will enable an effective and enhanced partnership between Sport Integrity Australia and our stakeholders to address integrity threats to Australian sport now and in the future. The theme of the 2023 conference was Safeguarding Our Sport and for the first time ever state and federal child protection agencies and sport were in the room to help us protect those most vulnerable in sport.

"Brisbane 2023 provides a blueprint for organised crime to build their operating model to exploit vulnerabilities in the system," CEO David Sharpe said. "The pathway of events is an opportunity for all of us to work together to change the culture of poor behaviour and put a protective ring around sport."

Feedback and insight from these key partners on adapting to our environment (sharing insights with partners), strengthening our environment (through partnerships, resources and influencing positive behavioural change across the sporting community), and addressing threats to our environment (coordination efforts to address sport integrity threats) have been considered in the implementation of Safety In Sport.

The outcomes of this consultation process demonstrated the need focus on the broad range integrity issues threatening the sports ecosystem. Reverting to a model that focuses on anti-doping alone, with light touch investment on other integrity matters will be detrimental to the reputation of sport in Australia and will not provide a safe environment for everyone to enter and stay in sport – with the potential to become a nation of strong and proud elite athletes.

Sport Sector Advisory Group on Education

Sport Integrity Australia works to promote positive behaviours in sport and deliver programs that are designed to minimise and prevent integrity risks. Sport Integrity Australia's education programs, including face-to-face, online, outreach, digital and print resources, videos and additional digital collateral, are key to this work.

A major challenge for the Education program has been the need to create national resources and programs that can support a range of participants across more than 90 different sporting cultures and environments, each with their own education maturity and unique audience profiles. And now, the challenges of new and emerging integrity threats need to be considered, particularly with reference to the remit of the Safety In Sport initiative.

As such, Sport Integrity Australia has engaged with the Sport Sector Advisory Group on Education (the Group) to capture and embed feedback from sports into its education resources and programs and will continue to engage with the Group to inform the education requirements of Safety In Sport.

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The Group includes a diverse range of current sport administrators working in the integrity education space, representing a variety of sports and a variety of experiences across sport integrity threats areas including anti-doping, competition manipulation, member protection and child safety.

The Group provides opportunities for those embedding sport integrity at the coalface to formally contribute to the review and development of Sport Integrity Australia's programs and resources. By doing so, we believe the delivery of these programs and resources will be enhanced to be more targeted, impactful and relevant to their intended audience.

The outcomes of consultation with this group demonstrates the need educate at all levels on the broad range integrity issues threatening the sports ecosystem. Reverting to a model that focuses on anti-doping alone, with light touch investment on other integrity matters will be detrimental to the reputation of sport in Australia and will not provide a safe environment for everyone to enter and stay in sport – with the potential to become a nation of strong and proud elite athletes. Education under a status quo model would require sport to manage, maintain and enhance their education programs – feedback from stakeholders and evidence from the past suggests that sports cannot afford, nor have the skills to do this alone.

National Integrity Managers Network

The National Integrity Managers Forum was held in June 2023 for members of Sport Integrity Australia's National Integrity Manager (NIM) network with invitations extended to other National Sporting Organisations (NSOs) and National Sporting Organisations for People with Disability (NSODs).

The NIM network was established in July 2022 to provide support, collaboration and networking opportunities for Integrity Managers from NSOs and NSODs, with input and involvement from Sport Integrity Australia. There are currently 19 NIMs across 30 sports, with some NIMs working across more than one sport. These government-funded positions embedded in sport aim to boost sport's understanding, awareness and capability to manage threats at all levels to help keep their sport safe and fair and provide a mechanism for feedback to Sport Integrity Australia about issues on the ground.

The forum focussed on collaboration and information sharing and provided an opportunity for the NIM network and Sport Integrity Australia to spend time workshopping some challenges together, with a focus on Safety In Sport issues. The biggest focus this year was on educating members and managing complaints, while participants also discussed difficult issues they've faced.

Topics discussed included:

- Global trends in integrity threats to sport and implications to Australian sport
- Tackling eSafety, including reporting schemes and educational resources
- Social media policy and resourcing
- Sports gambling
- Assessing the sports integrity threats
- Start to Talk campaign
- AIS Respectful Behaviours program

Throughout the rollout of the National Integrity Framework, stakeholders from right across Australia provided regular feedback that integrity resources were much needed at the State and Territory level. Stakeholders advised that understanding and implementation of the Framework at that level and down to grassroots was problematic. As such, the policies were not adequately covering and protecting participants at all levels of sport.

The National Integrity Framework underwent a lengthy review from October 2022 through until June 2023 with extensive feedback provided from stakeholders at all levels of sport. This included surveys, webinars and formal correspondence from sports organisations, federations and academies seeking State Integrity Managers.

Sport Integrity Australia offered two options:

1. SIA to employ Integrity Managers and direct them to work on state and territory implementation; and
2. SIA to provide funding to State and Territory organisations to employ and Integrity Manager.

Option 2 was preferred as there were some concerns raised about Commonwealth employees conducting work for State Governments. Additionally, a key goal of the program would be to have Integrity Managers embedded in the organisations to ensure traction of the role and ensure sustainability of integrity capability into the future.

Feedback from this group demonstrated the positive influence NIMs have had on sport at this level, in particular the embedding of National Integrity Framework policies, and highlighted the need to provide support at the state level. Reverting to a model that focuses on anti-doping alone, with light touch investment on other integrity matters will be detrimental to the reputation of sport in Australia and will not provide a safe environment for everyone to enter and stay in sport – with the potential to become a nation of strong and proud elite athletes. The risk of non-compliance with the National Integrity Framework and appropriately addressing integrity managers at the sport level would be high under a status quo model as

embedded integrity managers would cease with ceasing funding. The status quo scenario demonstrated the need for this level of government support, and feedback from this National stakeholder group has provided a high level of support for the preferred option.

Athlete Advisory Group

Regular consultation with Sport Integrity Australia's Athlete Advisory Group (AAG) occurs. The AAG is composed of current and former athletes (and para-athletes) to provide a unique forum for feedback from those who are often the most directly affected by the operations of Sport Integrity Australia. It provides insights into the pressures and influences that threaten integrity in sport, enabling confirmation of strategies and to ensure education courses and resources are fit-for-purpose. By engaging with athletes who truly understand their environment and the pressures of sport, we enhance our capabilities.

Sport Integrity Australia is committed to learning from athletes' experiences and knowledge and to giving athletes a voice when it comes to responding to integrity threats in sport. As part of that commitment and to engage on Safety In Sport matters, the agency's [Athlete Advisory Group](#) (AAG) met in Canberra in June 2023.

Members discussed anti-doping issues, including a proposed joint project with the Drug Free Sport New Zealand (DFSNZ) Athlete Committee to feed into the 2027 World Anti-Doping Code review and were engaged by our Science and Medicine team as part of the 2024 Prohibited List consultation process. Members further discussed gambling in sport in Australia, anti-doping testing education, coaching children, the Annual Update and the new Play by the Rules Start to Talk campaign.

The meeting heard suggestions about our education from the Athletics Australia Athlete Committee, as well as an AIS Supplement Steering Committee request for a simple visual process for athletes to understand the testing procedure and what happens once a sample is taken. This type of feedback is useful in the development of other education products.

"This meeting was invaluable when it comes to athlete engagement," said Linda Muir, Director of Sport Partnerships.²⁴

"By engaging with athletes who truly understand their environment and the pressures of sport, we enhance our capabilities with informed strategic direction and the ability to shape education strategies through their insights.

"Importantly, we always engage with the AAG when our work is in the planning or preliminary stages, so we genuinely seek their feedback as opposed to sharing a finished product just for them to note."

The outcomes of consultation with this group demonstrates the need address the broad range integrity issues threatening the sports ecosystem, that have a detrimental effect on athletes and participants. It highlights the need for education at all levels, research that will inform better policy and practice and the need to make sport safe. Reverting to a model that focuses on anti-doping alone, with light touch investment on other integrity matters will be detrimental to the reputation of sport in Australia and will not provide a safe environment for everyone to enter and stay in sport – with the potential to become a nation of strong and proud elite athletes.

Australian Sports Commission

Our government sport partners, including the ASC and NST, provided us with an understanding of the sporting landscape. From this consultation we have ascertained that 82% of Member Sports surveyed in the 2020-21 AusPlay survey indicated that insufficient resources and funding was a key barrier to growing participation. This is reflected in a decline of Sport Australia's base funding provided directly to NSO/Ds over the past 6 years for participation activities. Beyond NSO/Ds' base funding, the ASC has provided close to \$130 million in participation funding in FY19, including \$72 million in community sport infrastructure (of a total \$102 million), \$27 million in sporting schools' grants and \$11 million in Better Ageing grants. The feedback and information were used to help explain why sport can't afford to tackle these issues alone.

Sport Integrity Australia already charges for Anti-doping services and receives direct feedback from sports during contract negotiations on the affordability of this charging regime. This feedback has been used to indirectly support the need for funding sports with broader integrity matters beyond Anti-doping.

The Australian Sports Commission partnered with the Australian Human Rights Commission and the Coalition of Major Professional and Participation Sports to develop Guidelines for the inclusion of transgender and gender diverse people in sport. The Guidelines provide practical advice on how sporting organisations can create and promote an inclusive environment for transgender and gender diverse people. We will collaborate with these stakeholders on any emerging integrity issues.

²⁴ [AAG gives voice to sport integrity matters | Sport Integrity Australia](#)

University of Canberra

Utilising feedback and experience from existing research partnerships, Sport Integrity Australia aims to better understand the environment in which we operate, enhance our existing capabilities and resources, and create a safe sporting environment for all participants.

As an example, outcomes from the joint research project with the University of Canberra that commenced in November 2022 will be used to inform future policy and procedure under these proposals and any future investment in research.

University of Canberra Vice-Chancellor Professor Paddy Nixon said this partnership “connects us to the real challenges”.

“With Sport Integrity Australia at the forefront of sport integrity and we, as a university leading sport integrity research in Australia, this partnership is very unique,” he said. “This has been done in very few places in the world.”

He said the MoU between Sport Integrity Australia and the University of Canberra also allowed for future collaboration between the two bodies in scientific and integrity in sport research.

UC Director of Sport Carrie Graf said sport integrity was an important theme running through the university’s entire sporting strategy so “the partnership with Sport Integrity Australia is absolutely critical to the growth and work we are doing”.

“The research we can do in partnership with Sport Integrity Australia can have a major impact on the community more broadly, not just the sports community. It’s such a critical piece in the sport industry.”

Associate Professor Dr Catherine Ordway, the Sport Integrity Research Lead at the university, said the partnership had far-reaching possibilities beyond the existing research – demonstrating support for the preferred option vs status quo which would provide no capacity for research undertaken by Sport Integrity Australia. Under the status quo option, Australia would be required to rely on research outcomes from international government, sports and private bodies to inform its policy and process, particularly with respect to emerging threats.

In addition to the stakeholders presented at figure 6 and discussed above, Sport Integrity Australia developed an engagement matrix to identify key partners and stakeholders that will influence decisions around our future funding and activities, and the relationship to their initiatives. This is presented at Table 7.

Table 7. Engagement Matrix

	Health & Aged Care	Home Affairs & social Services	Law enforcement & Intel Community	International (DFAT and NADOs)	AOC/CGA/PA	AGD	PMC	DITRDCA	State & Territory gov
Major events	Office for Sport ASC – HPP 2032+ Strategy, participation strategy AIS/NIN network Inquiry into Australia’s preparedness to host the Commonwealth, Olympic & Paralympic Games.	INTL sporting events (facilitation)	Radicalisation & racism Transnational crime Drug import Money laundering	Pacific Games 2023 & 2027 ORADO funding (pacific) PA/AOC support for regional events/athletes/coaches	2032 Olympics & Paralympics 2026 COM Games 30+ international events in the lead up to 2032 Comm Youth Games 2023	Education Safeguarding Major event security		2032 Games 2026 Comm Games Major event betting monitoring	2026 Comm games 2032 Games (QLD)
Criminal activity & regulatory	TGA	Drug import Money laundering Gambling	Radicalisation & racism Transnational crime Drug import Money laundering Digital capability (phone download)	Offshore disruption	Match fixing Gambling Performance enhancing drugs	Child safeguarding & vulnerable people	Data analytics (data sharing) Data Commissioner	Match fixing Gambling	State policing Local manufacturing of drugs
Integrity	NST		Offshore gambling & match fixing		Classification (para) Transgender competition	NACC Esports	Interactive gambling Senate Inquiry into online gambling		State child protection agencies
Inclusion & diversity	Disability strategy Women in sport 50:50	Social cohesion NDIS/INDIA - equity & accessibility		<ul style="list-style-type: none"> Ambassador for gender equality. Pacific pathways 2032 UNESCO Sports Diplomacy 2030 TeamUP – pacific Sport partnership program 	Racism	AHRC	Gender equality Women in Sport 50:50 Pacific strategy National Indigenous Australians Agency	Social media – racism	Safety in sport (PM letter of SEPT22)
Safety	<ul style="list-style-type: none"> Concussion in sport Mental health Drug use 	Online abuse Child safeguarding Woman safety Nation redress Safe & support f/work	Prevent & respond to child abuse 2030	Child safeguarding Women safety	Child and women’s safety (physical and psychological)	National Office for Child Safety Royal Commission (child abuse)		Chief Scient and NMI (DISR) eSafety	Safety in sport (PM letter of SEPT22)

5.2 Future Consultation

We are already engaging broadly with stakeholders on many existing Sport Integrity Australia initiatives. Feedback from our stakeholders on the level of success from these projects has been used to inform the planned initiatives under this proposal. Further engagement will be required to develop strategies under this proposal more thoroughly.

For example;

- feedback from eSafety and sports on the outcomes and benefits of our existing partnership with them in developing cyber education products for sports, along with additional consultation will be used to develop the future strategy under the proposed options. The strategy may include secondment arrangements to provide specialist skillset to inform policy/education development, co-create a face to face/webinar session particularly with sports around online issues and complaint management in sport, and development of a video series around online safety for sports.

Feedback from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to date notes there has been ongoing collaboration between Sport Integrity Australia and eSafety for some time to develop online safety resources for sporting organisations and to receive reports of online harm through an MOU. It has been noted that development on the detail of additional activities with eSafety is yet to be done and the proposal for secondments requires input and consultation from eSafety.

- feedback from the Australian Human Rights Commission on the successful implementation of recommendation 11 in the Australian Human Rights Commission's Report 'Change the Routine: Report on the Independent Review into Gymnastics in Australia', to expand SIA's current 1300 number to establish a toll-free triage, referral and reporting service is critical to informing next steps in our proposed options.

Feedback from Attorney Generals Department (AGD) to date supports-in-principle the proposal to enhance Sport Integrity Australia's role in improving safety, integrity and culture in sport in Australia, including through addressing human rights issues such as discrimination and racism. AGD strongly recommend the Department of Health and Aged Care and Sports Integrity Australia consult the Australian Human Rights Commission on the proposed partnership to support the development of the Sport Culture and Diversity Strategy, in relation to associated resourcing impacts on the Australian Human Rights Commission and their expertise on this issue. AGD welcome the focus on inequality and discrimination against women and girls and Aboriginal and Torres Strait Islander people. AGD support consideration of all vulnerable groups that experience discrimination in sport, including the LGBTIQ+ community and peoples from culturally and linguistically diverse backgrounds. The expansion of SIA's role is necessary to ensure sports are safe and inclusive, for children.

- Sport Integrity Australia will engage with the Digital Transformation Agency (DTA) to discuss the ICT changes required to implement the new case management system and desired education digital technologies. This will allow the DTA provide advice regarding the requirements of the Whole-of-Government Digital and ICT Investment Oversight Framework.

SIA has developed an engagement strategy that is focused on government departments and agencies, state and territory governments, law enforcement, child protection and key bodies such as AOC, eSafety Commissioner and National Office for Child Safety. AGD looks forward to being consulted on the implementation of the program.

6. What is the best option from those you have considered?

The recommended option is Option 3 (HIGH) and provides the greatest net benefit to Australian sport, meets the expectations of the Wood Review and poses no additional regulatory burden on sport or participants. The preferred option would provide a safe sporting environment to encourage participants to enter and stay within the sport ecosystem over their lifecycle - increasing participation rates in the lead up to the 2032 Olympic and Paralympics, developing the children of today into our Olympic athletes of tomorrow. The preferred option is transparent in intent and defensible to both government and external scrutiny.

The recommended option provides funding to fully implement all Safety in Sport functions, anticipate, prepare and safeguard against future integrity threats and enable Sport Integrity Australia to be the national coordinator charged with the protection of the integrity of sport and the health and welfare of those who participate in it.

Considering media relating to safety in sport, in his letter of 29 September 2022 the Prime Minister the Hon Anthony Albanese MP supported the announcement of the Safety in Sport initiative to enhance and adapt the agency's capability and services to support people at all sporting levels to address matters of safety, including sexual misconduct. He outlined that if the agency required expanded scope or additional funding, that the agency comeback with a detailed proposal. The preferred option meets the Government's objectives in addressing evolving threats within the Australian sports ecosystem and growing demand for the agency's services.

Women's sport has been in a period of extraordinary growth and gaining mainstream, and political support. In August 2022, Minister for Sport, the Hon. Anika Wells MP called for greater female representation in sports' boardrooms and on the field—emphasising the need for equal pay, integrity and equality in sport. The preferred option addresses Government and stakeholder requests to address safety issues concerning women and children in sport and continue to invest in evidence based research to inform future policy and procedure.

The Disability Royal Commission will report by 29 September and a critical focus of the recommendations will be on highlighting the prevalence of all forms of violence against people with disability, including women, girls and First Nations people with disability along with stigma, exclusion and isolation. All options will focus on achieving Government objectives regarding the safety of people with disability in sport, however the preferred option will reach these participants at the state/territory and community level where the prevalence of these issues is the greatest. Creating a safer environment for people with disability will enable greater participation and associated positive health outcomes.

The preferred option has been formulated based on the support and feedback received from stakeholder groups discussed in section 5.1 with the addition of feedback provided at 5.2. The preferred policy option will be further enhanced as consultation has highlighted the need for Sport Integrity Australia to have a peer review or seek feedback from key stakeholder groups on implementation and effectiveness of existing activities. For example throughout the rollout of the National Integrity Framework, stakeholders from right across Australia provided regular feedback that integrity resources were much needed at the State and Territory level. Stakeholders advised that understanding and implementation of the Framework at that level and down to grassroots was problematic.

The assessment has not explored in detail, potential outcomes of research in the preferred option. As discussed in the impact table – there could be further work required of Sport Integrity Australia, government, or key stakeholders because of findings, which the preferred option has not considered further. For example research into an emerging safety in sport issue may highlight the need for government regulation, an expanded remit of Sport Integrity Australia, subsequent policy development etc.

7. How will you implement and evaluate your chosen option?

Figure 9. Sport Integrity Australia Vision



Ongoing evaluation, management and review of recommended options will be monitored through Sport Integrity Australia’s key governance and management frameworks, structures and processes.

Management structure - Senior management responsibilities, organisational structure and committees operate with suitable terms of reference to enable the implementation of appropriate controls and the sound monitoring of activities and performance.

Management environment - Sport Integrity Australia’s purpose, is monitored and assured by the corporate planning framework, strategies, planning processes and performance measures.

Risk Management Framework - Supports effective risk management across all agency operations and business functions. The framework sets out how risk management is embedded for all business operations and decision-making. It outlines the relevant components and arrangements that enables Sport Integrity Australia to design, implement, monitor, review and continually improve risk management across Sport Integrity Australia.

Performance framework - details how Sport Integrity Australia’s performance in achieving its purpose will be measured and assessed and aligns with emerging regulatory requirements. Planned performance results include a mixture of qualitative and quantitative output, effectiveness, and proxy efficiency measures to provide a complete picture of our impact. Delivery of the forward years planned performance results is contingent on Australian Government budget commitments.

Performance measures and planned performance results are included in the 2023–24 Health Portfolio Budget Statement (provided in detail at Appendix B) and in the performance section of the Corporate Plan. Sport Integrity Australia’s Annual Performance Statement, included in its Annual Report, will report on the achievement of performance measures and provide narrative and analysis relating to its performance as summarised in table 8 Performance Measures.

Table 8. Performance measures

Targets	Milestones and deliverables	Metrics and outcomes
A safe environment for all participants in sport.	a. 2023–24: Deliver the Safeguarding in Sport Continuous Improvement Program (SISCIP) effectively and establish measurement baseline data for the Program. b. 2023–24: Establish measurement baseline for Children’s Perception of Safety in Sport Research data.	a. 2023–24: Increasing percentage of sports capable of implementing a safe sporting environment for all participants, of all ages, across all levels of sport. b. 2024–27: To be set in 2024–25 once baseline data established.
Australians involved in sport understand, model and promote positive behaviours.	a. 2023–24: Design a survey to measure behaviours in sport across core sport integrity themes. 2024–25: Deliver the survey and establish baselines for survey data. b. 2023–24: increasing number of education	a. Forward years’ results would report an increasing percentage of surveyed individuals involved in sport who understand and demonstrate positive behaviours across core sport integrity themes, including doping, improper use of drugs and medicine, child safeguarding, member

Targets	Milestones and deliverables	Metrics and outcomes
	program completions as follows: 2023–24: 88,000 2024-25: 95,000 2025–26: 104,000 2026–27: 113,000	protection and competition manipulation. b. Provides insight into the reach of our education program. Implementation of the behaviours in sport survey (a) may enable measurement of effectiveness of our education programs in the future.
Sporting activities in Australia are fair and honest	a. 2023–24: Develop Sport Integrity Threat Assessment methodology. b. 2023–24: Implement a Sport Integrity Threat Assessment across 5 sports. c. 2024–27: Implement a Sport Integrity Threat Assessment across 10 sports.	In 2023–24, Sport Integrity Australia will develop the Sport Integrity Threat Assessment process and build the capability of our intelligence analysts to conduct sport-specific assessments of the threat environment. It will focus on 5 sports in the first year and increase to 10 further assessments on other sports in subsequent years.

7.1 Implementation Plan

7.1.1 Project Management Overview

It is proposed that these key bodies of work be undertaken according to the agency’s project management framework to ensure they are implemented on time, on budget, within scope and of high quality.

A high-level plan to address implementation will be achieved through these steps:

Prioritisation of Activities: Activities will be prioritised based on their potential impact and feasibility. Activities with higher priority will receive more attention with regards to resources, mentoring and executive sponsorship

Identification of Milestones: Critical milestones will be identified for each activity, such as project initiation, system implementation, or program launch. These milestones will include timeframes and will be measurable utilising project tools i.e., the project schedule, risk register, issues register, action items etc.

Assessment of Risk: Comprehensive risk assessments will be completed for each milestone. This includes evaluating the likelihood for not achieving milestones and the potential consequences. Risks will be categorised as low, medium, or high, allowing us to allocate resources and contingency plans accordingly.

Contingency Plans: Contingency plans will be developed for high-risk milestones to mitigate potential delays. These plans will outline specific actions to be taken if a milestone is at risk of not being achieved on time.

Reporting and Monitoring: Systems will be established to facilitate regular monitoring and reporting throughout the implementation process or phase. This will include progress updates, risk assessments, and adjustments to plans as required.

Transition to Business as Usual (BAU): There are critical factors that need to be considered before transitioning from a project to BAU. These include:

- How sustainable project activities are within existing business operations without any need for project resources.
- Assessing whether integration between project activities and existing processes, systems and workflows will be seamless.
- Is stakeholder readiness high to absorb and support the projects outcomes within their day-to-day activities. Training, communication, and change management have been conducted.
- Governance structures and reporting mechanisms and defined and clear to stakeholders. This will provide opportunities to monitor performance and the effectiveness of project outcomes.
- Have the projected benefits through the implementation of the project been realised within the context of day-to-day activities.

For each activity, the following steps will be initiated:

- Develop a comprehensive project plan with timelines for each activity, and regularly review progress. Regular progress reports will be submitted to Executive for critical decision making and to ensure timeframes, budget and risk are articulated and addressed accordingly.

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- Develop working groups by assigning responsible individuals as project managers and executive sponsors for each activity to delegate work against, integrate related initiatives (best change management practices) and ensure accountability.
- Identify potential risks and consequences of delays for each milestone to proactively address issues through executive consultation.
- Engage stakeholders to provide input and feedback throughout the implementation process, reducing the likelihood of unexpected setbacks and to increase user buy-in.

7.1.2 Implementation Plan: Enhance the Safe Sport Hotline, Information Triage and reporting service

Purpose: Enhancements to the existing Safe Sport hotline, information triage, referral and reporting service to ensure the agency can appropriately respond to increasing volumes of complaints and reports associated with child safeguarding and discrimination based on protected characteristics, such as race, gender, and disability.

Implementation Timeline: Currently in progress with continuous improvement integrated in business-as-usual activities. The Information Coordination Operational Process (ICOP) and the Case Management System projects will heavily influence any enhancements to the Safe Sport Hotline. The ICOP includes the refinement and integration of a new Operational Planning Framework and associated governance, implementation, and expansion of the Information Coordination Centre (ICC) and updating the Investigation Management Guidelines.

Start Date: Ongoing since July 2023

End Date: October to December 2024 with ongoing continuous improvement

Responsible: Information Coordination Centre (ICC) and Capability Development Hub.

Likelihood of Delay: Medium.

Milestones:

- May 2024: Assessment of need and Development of the Strategy.
- October to December 2024: Alignment of Safe Sport Hotline requirements with the new Case Management System.
- October to December 2024: Hotline operators and Information Coordination Centre staff are trained on the new procedure and systems.

Consequence of Delay: Potential for reduced effectiveness in addressing urgent issues. Potential for the enhancements and actual needs are misaligned. Staff are not prepared to manage calls leading to a reduction in efficiency.

Mitigation: Continuous engagement with staff for feedback to ensure the alignment of the strategy against the evolving needs of the agency. Refresher and resource access post initial training.

7.1.3 Implementation Plan: Case Management System

Purpose: implementing a new Case Management system to underpin triage, assessment, review, investigation and intelligence activities—with appropriate, accountable decision-making workflows—and associated insightful reporting and automated record-keeping. The new system will remove lack of consistency and complex, inefficient processes that currently exist with disparate systems, and facilitate an efficient and streamlined process with participant wellbeing at the forefront.

Implementation Timeline: In Progress – project initiation has commenced.

Start Date: In-progress.

End Date: October to December 2024.

Responsible: Capability Development Hub and the IT Section

Likelihood of Delay: High - integration is heavily influenced by the ICOP project.

Milestones:

- October 2023: Contract signed with vendor.
- December 2023: Completion of Business Discovery Phase
- May 2024: Completion of Module 1 – Integrity Complaints
- October 2024: Completion of Module 2 – Anti-Doping
- October to December 2024: System testing ICMS compatibility against existing infrastructure and integration into existing frameworks. Handover to new ICMS system.

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Consequence of Delay: Existing measures are in place, but potential disruptions may occur during the change over to the new system. Integration into existing frameworks are delayed.

Mitigation: Continue with the existing system in parallel. Increase end user awareness and include input and feedback – implementation of change management practices. Integrate the vendor through the project lifecycle to implement the new ICMS, leveraging their expertise to solve functional issues.

7.1.4 Implementation Plan: Wellbeing Capability Framework

Purpose: operationalising the agency's Wellbeing Capability Framework by providing care (through training or an appropriate support service) to those experiencing a traumatic event; listen to, view, or read descriptions about traumatic events; or experience, witness, or investigate traumatic events.

Implementation Timeline: Assessment will be prioritised against agency priorities.

Start Date: February 2024.

End Date: February 2025.

Responsible: Human Resources (People & Culture) and Capability Development Hub.

Likelihood of Delay: Medium.

Milestones:

- September 2023: Framework developed
- June 2024: Consultation, develop policy and procedures to support framework
- October 2024: Training, capacity building and awareness programs.
- January 2025: Service and Promotional Launch and continuous improvement

Consequence of Delay: Delayed support for individuals in need – trauma care support. Perpetuate the impact on mental health and the wellbeing of trauma survivors. Reputational Damage due to lack of trauma support.

Mitigation: Utilise existing resources and systems until the network is fully operational. Regular and transparent communication to the community with potential support provided through partnerships like the National Integrity Framework.

7.1.5 Implementation Plan: Enhancements to existing education programs

Purpose: Enhancements to existing education programs to cover bullying, harassment, discrimination, and emerging safety issues, with new innovative delivery methods and increased accessibility to reach all levels of sport including those with a disability. There will be a focus on educating women and girls who, in a previously male dominant arena, may not have had or been given the opportunity to receive education on sport integrity matters. There will be a new review of all material to ensure it is culturally sensitive and appropriate to the needs of First Nations People, people with a disability and CALD participants.

Implementation Timeline: Ongoing to be fit for purpose in a dynamic sport integrity environment.

Start Date: In-progress.

End Date: TBA – education products to be reviewed and prioritised in conjunction with other related and dependent initiatives

Responsible: Education, Safeguarding, Culture and Diversity sections

Likelihood of Delay: TBA.

Milestones:

- Ongoing: Review of existing content and development of new resources, programs and enhancements.

Consequence of Delay: Prolonged use of outdated materials. Training gaps on critical issues.

Mitigation: Potential to develop temporary or supplemental materials to address outdated material and training needs. Develop online resources and temporary workshops to cover essential training.

7.1.6 Implementation Plan: Diversity Strategy

Purpose: Develop and implement a new First Nations skills program to understand and address disparities in participation and administration across sport, so Aboriginal and Torres Strait Islander people are welcomed and feel safe and included in the sporting ecosystem.

Develop and implement a new Empowering Women and their voice in sport initiative to address integrity challenges contributing to the representation of women leaders, to include concepts such as agency placements/internships/shadow a CEO and influencing a positive shift in the culture of Sporting Boards and CEOs to attract, retain and promote women leaders

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in sport. Promoting diversity in leadership is a key step towards addressing the integrity issues facing women and girls as it provides a voice to this cohort of participants.

Develop and implement a new Sport Culture and Diversity Strategy which will inform policies, programs and services delivered by the agency. Led by the agency's Culture and Safety Advisor and an Advisory Committee to provide representation of the different Indigenous cultures across Australia, culturally and linguistically diverse people and people with disability.

Implementation Timeline: Assessment will be prioritised against agency priorities.

Start Date: February to May 2024.

End Date: February to May 2025.

Responsible for all or select initiatives: Culture and Safety Advisor and Advisory Committee, Human Rights consultation, Deputy CEO Safety In Sport

Likelihood of Delay: TBA

Skills Program for First Nations Peoples

Milestones:

- January to September 2024: Needs Assessment through consultation with relevant stakeholders
- October 2024 to March 2025: Framework development.
- February 2025 to May 2025: Implementation and rollout
- Ongoing: Sustainability strategies including expanding reach and impact.

Consequence of Delay: Delayed skill development for the community. Delayed upskilling for participants. Diversity inequality may be perpetuated.

Mitigation: Utilise pilot workshops to address immediate needs. Develop interim skill building workshops, sessions, or partnerships with local communities.

Empowering women from all culturally diverse backgrounds to have their voices heard in sport at all levels

Milestones:

- January to September 2024: Needs Assessment through consultation with relevant stakeholders
- October 2024 to March 2025: Framework development.
- February and ongoing: Market and promote the voice – awareness and advocacy initiatives.
- February 2025 to May 2025: Implementation and rollout
- Ongoing: Sustainability strategies including expanding reach and impact.

Consequence of Delay: Delayed enhancements which sport foster to promote women leadership and amplify women's impacts and mindset shift. Women leadership is not attracted to the sports sector. and turnover exceeds expectation or does not show growth. Gender inequality may be perpetuated.

Mitigation: Utilise existing resources and systems until the strategy is fully implemented. Regular and transparent communication to sports with potential support provided through partnerships and secondments.

Sport Culture and Diversity Strategy

Milestones:

- January to September 2024: Needs Assessment through consultation with relevant stakeholders
- October 2024 to March 2025: Framework development.
- February and ongoing: Market and promote the voice – awareness and advocacy initiatives.
- February 2025 to May 2025: Implementation and rollout
- Ongoing: Sustainability strategies including expanding reach and impact.

Consequence of Delay: Policies, programs, and services are outdated and not fit for purpose. Strategies are not diverse and inclusive leading to talent attrition. Integrity matters are ill informed and continues without representation of a diverse range cultures led by kay indigenous figures.

Mitigation: Regular and transparent communication with stakeholders. Utilise existing resources and systems until the strategy is fully implemented. Established workshops and utilise the Culture & Safety Advisor and the Advisory Committee relationships to inform current practices.

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7.1.7 Implementation Plan: Sports Cultural Hub

Purpose: A sports cultural hub and media studio that recognises, celebrates and promotes First Nations peoples, those from culturally and linguistically diverse (CALD) backgrounds and people with a Disability in sport through accessible technology suitable for interviews, podcasts and broader communication on safe, fair sport.

Implementation Timeline: February to April 2024 to February 2025.

Start Date: February 2024.

End Date: April 2025.

Responsible: Safety and Culture Advisor, Executive Group and ICT, Property & Security Team.

Likelihood of Delay: Medium.

Milestones:

- February to May 2024: Planning and conceptualisation for determining media types.
- June 2024: Needs assessment completed and developed the architectural plans for renovations.
- September 2024: Construction
- April 2025: Opening of the new cultural hub and media studio.

Consequence of Delay: Prolonged usage of current space for teams and utilising rooms that could be used for meetings and private conversations. Cost involved if utilising external spaces for stakeholder meetings. Delays in content delivery. May lead to missed opportunities for partnerships or interviews of individuals.

Mitigation: Continue with current practices with communication regarding use of existing spaces. Maintain audience engagement to retain interest.

7.1.8 Implementation Plan: Social Media Analytics capability

Purpose: New social media analytics capability to provide a complete picture of all of Sport Integrity Australia's social media efforts including effectively identify trends and sentiments, monitor channels, sources and influencers, as well as audience affinities and; complement intelligence efforts by building intelligence profiles, track keywords, hashtags, and phrases, as well as set up notifications for new mentions or conversations

Implementation Timeline: January to March 2024 and ongoing.

Start Date: January 2024.

End Date: Ongoing until transitioned to BAU.

Responsible: Strategic Intelligence, ICT, Property and Security, Communications and Education

Likelihood of Delay: Medium.

Milestones:

- January to May 2024: Needs assessment and strategy developed to enhance open-source analytics capability.
- June 2024: appropriate tool/s identified and operationalised.

Consequence of Delay: Social Media efforts are inefficient and responding to trends is more difficult. The wrong messages are published and do not meet the needs of the sporting community and stakeholders. Loss of reputation due to a lack of environmental awareness.

Mitigation: Continue with current practices for social media analytics. Leverage existing partnerships and support from stakeholders to inform stakeholder needs. Utilise an agile approach especially for development of social media trends enables flexibility.

7.1.9 Implementation Plan: Strategic Intelligence

Purpose: New strategic intelligence capability to strengthen our understanding of key issues impacting the sports integrity threat environment, now and on the horizon. It will provide an evidence base to underpin an efficient, effective approach to deterring, disrupting, and detecting threats.

Implementation Timeline: ongoing

Start Date: commenced April 2023

End Date: Ongoing until transitioned to BAU.

Responsible: Strategic Intelligence Development Program, Capability Development Hub, Intelligence & Anti-Doping Investigations teams.

Likelihood of Delay: Low.

Milestones:

- April – May 2023: benchmarking with key domestic and international partners
- July 2023: annual threat assessment disseminated
- September – Dec 2023: development of intelligence strategy, identification and development of required capabilities
- January – March: operationalise to BAU.

Consequence of Delay: Resources and efforts are inefficient and do not align with key integrity issues facing sporting environments. The agency is vulnerable to emerging threats and evolving environments. Deterrence, disruption and detecting threats is limited to current practices. Loss of reputation due to a lack of environmental awareness. Missed opportunities to implement a strategic advantage for sports and the community.

Mitigation: Continue with current practices and look to leverage existing strategies and support. Leverage existing partnerships and utilise potential secondments to address threats with appropriate and timely responses. Utilise an agile approach especially for development of intelligence or technical requirements which enables flexibility.

7.1.10 Implementation Plan: State Integrity Managers

Purpose: New Integrity managers embedded within state/territory sports and representation agencies of Community Sport Australia to ensure safe sport policies and practices are implemented at the state/territory and community level, where the impact is the greatest and most complaints derive from.

Implementation Timeline: January 2024 and ongoing.

Start Date: January 2024.

End Date: Ongoing until transitioned to BAU.

Responsible: Sport Engagement teams and Australian Sports Commission

Likelihood of Delay: Low

Milestones:

- March 2024: Develop the strategy through partnerships with state and territory bodies to embed Integrity Managers via grant application process
- June to December 2024: Recruitment, Training and onboarding.
- January 2025 to June 2025: Performance monitoring through metrics and KPIs.
- January 2025 to June 2025: Stakeholder engagement (ongoing) to foster support.

Consequence of Delay: Operational inefficiencies impacting delivery and performance. State and territory bodies policy and procedures are out of date. Athletes and stakeholders are not supported on integrity matters, in particular the community level. Loss of reputation due to a lack of environmental awareness. Leaderships gaps which impact decision making.

Mitigation: Continue with current practices and look to leverage existing strategies and partnerships through the Sport Engagement teams. Enhance communication strategies to highlight the shortfalls for state and territory bodies and their athletes. Leverage existing partnerships and utilise potential secondments.

7.1.11 Implementation Plan: Sport Integrity Research Institute

Purpose: Fund the establishment of a new Sport Integrity Research Institute (\$1.0 million per annum) through partnering with Australian Universities to better understand and provide informed solutions to address abuse, mistreatment, child protection and racism across all levels of Australian sport. This will ensure agency programs and services are both contemporary and fit for purpose and ensure evidence-based policy advice and development. In addition, research will inform the medium to long term future of the First Nations skills program and Empowering Women and their voice in sport initiative.

Implementation Timeline: January 2024 to June/December 2025.

Start Date: January 2024.

End Date: June to December 2025.

Responsible: Deputy CEO Safety In Sport

Likelihood of Delay: Medium/High

Milestones:

- January to December 2024: Needs assessment and development of the institute framework
- January to June 2025: Seek and evaluate expressions of interest from Universities
- July to December 2025: Develop Partnership Negotiations.
- January 2025: Rollout of the program, service launch.

Consequence of Delay: Agency programs and services are not contemporary and not fit for purpose. Policy development is outdated. The First Nations skills program and Empowering Women and their voice in sport initiative may be underutilised. Loss of reputation due to a lack of environmental awareness.

Mitigation: Continue with current practices and look to leverage existing strategies and support. Develop contingency plans to mitigate any unforeseen issues like adjusting service timelines. Leverage existing partnerships with universities to inform and to address threats with appropriate and timely responses.

7.1.12 Transitional arrangements for stakeholders

Transitional arrangements are essential for ensuring a smooth transition for stakeholders. By leveraging subject matter experts, the communications team and human resource elements,

Transitional Arrangements:

Consultation with key stakeholders will be implemented to provide diverse perspectives for informed decision making. Engaging in consultation with key stakeholders also ensures proactive identification of risk and mitigation strategies to avoid escalation of issues.

Consultation provides challenges including avenues for resistance, it is time consuming and requires significant balancing of expectations. Therefore, selective involvement will be based on relevance, efficiency and a focus on key stakeholders who could be decision makers and or subject matter experts impacted by the change.

Clear communication with stakeholders about the changes and improvements being made through change management best practices including:

Clear communication channels between roles, teams, departments, divisions stakeholders and communities.

Ensure stakeholders and communities are updated on the progress and impacts the change will have.

Feedback at all levels will be available and encouraged.

Celebrate successes at each level of the organisation and community.

A series of stakeholder workshops, meetings, and informational materials.

Provide comprehensive training and resources to stakeholders as needed to ensure they are prepared for the transition.

Establish a feedback mechanism, such as a dedicated email address or online portal, for stakeholders to voice concerns, ask questions, and offer suggestions.

Ensure transparency in the transition process by sharing regular updates, progress reports, and timelines with stakeholders.

Although more complex and may be resource intensive; consultation, communication and feedback mechanisms will all be trauma informed to enhance empathy and understanding, minimise re-traumatisation and to build resilience through supportive trauma responses.

Steps for Stakeholders: Steps will be outlined for stakeholders, including any actions or responsibilities they need to take during the transition. This information will be communicated clearly and well in advance of any changes.

Support: To facilitate a seamless transition, support mechanisms will be established for stakeholders. This may include dedicated support teams, helplines, or online resources to address their questions or concerns.

Feedback Mechanism: Feedback mechanism will be implemented for stakeholders to express their thoughts and concerns during the transition. This feedback will be used to make necessary adjustments to the process.

Safe Sport Hotline Enhancement: Stakeholders will be informed about new reporting procedures and ways to access services through the website and updates, and other avenues for hotline announcements.

Wellbeing Support: Stakeholders can access support services when available and how to use them through engagement tools like brochures, online guides, and community meetings.

Educational Tools: Stakeholders will be informed about the updates to resources and provided training opportunities. Notification tools will include emails, newsletters, online courses, and HR-led seminars.

Skills Program for First Nations Peoples: Benefits and participation requirements will be outlined through community gatherings, led by Sport Integrity Australia and the Sport Culture & Safety Advisor, indigenous leaders, and other formal tools or informal communication tools.

7.1.13 Evaluation plan

Evaluating the effectiveness of the development and implementation of activities is critical.

Objectives: Define clear objectives that align with the organisations corporate plan. This can be achieved through the development of key performance indicators (KPIs) for each activity. This may include response times for the Safe Sport Hotline, capturing the number of trauma related cases managed, the satisfaction level of end-users and training participants, and the skill development progress of First Nations peoples.

Baselines: Establish a baseline for existing metrics before implementation by collecting relevant data on current performance levels.

Data Collection: Regularly collect data on KPIs and compare it to the baseline through user-friendly data collection tools including web forms, surveys, and other feedback forms. There is potential for these to be accessed by end-users via mobile apps or web portals to encourage their active participation and to contribute their insights and feedback regularly.

Evaluation: Regularly assess the data against the objectives. By reviewing the effectiveness of policies and programs based on collected data will allow for real-time adjustments to programs.

Stakeholder involvement: Stakeholders will be involved in the decision-making processes to ensure stakeholder voices are heard which will drive continuous improvement. This will be achieved by holding regular meetings or surveys to gather qualitative feedback in the evaluation process. Stakeholder's involvement may be recognised through certificates of participation or acknowledgement in annual reports.

Transparency: Evaluation findings will be shared through progress reports, accessible online platforms and / or community meetings to maintain accountability. Stakeholders will have visibility on the success of the activities and areas for improvement.

Reference

Sport Governance Benchmarking Report 2022 | Australian Sports Commission (sportaus.gov.au)

ASF September 2021 report: Impact of Covid-19 on Community Sport

ASF May 2023 report: Community Clubs under pressure

ASF August 2023 report: Running on Empty

ASC Annual Report 2021-22

SIA annual stakeholder survey (June 2022)

SIA Portfolio Budget Statements

SIA Annual Report 2021-22

SPORT Powering Australia's future (10+10) May 2021

A YEAR IN AUSTRALIAN SPORT - Australian Sports Foundation (asf.org.au)

Appendix A – Details of NSOs and NSODs

Name	Sport	Funding status	Category
Air Sport Australia Confederation	Aircraft Sport	Unfunded	National sporting organisation
Archery Australia Inc	Archery	Funded	National sporting organisation
Artistic Swimming Australia	Synchronised Swimming	Funded	National sporting organisation
Athletics Australia	Athletics	Funded	National sporting organisation
AusCycling	Cycling, BMX, Mountain Bike	Funded	National sporting organisation
Australian Billiards & Snooker Council	Billiards & Snooker	Unfunded	National sporting organisation
Australian Calisthenic Federation	Calisthenics	Unfunded	National sporting organisation
Australian Curling Federation	Curling	Unfunded	National sporting organisation
Australian Dragon Boat Federation	Dragon Boat	Unfunded	National sporting organisation
Australian Eight Ball Federation	Eight Ball	Unfunded	National sporting organisation
Australian Fencing Federation	Fencing	Funded	National sporting organisation
Australian Flying Disc Association	Flying Disc	Unfunded	National sporting organisation
Australian Football League	Australian Football	Unfunded	National sporting organisation
Australian Ice Racing Inc	Ice Racing	Funded	National sporting organisation
Australian Jujitsu Federation	Jujitsu	Unfunded	National sporting organisation
Australian Karate Federation	Karate	Funded	National sporting organisation

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Australian Kendo Renmei	Kendo, Iaido and Jodo	Unfunded	National sporting organisation
Australian Outrigger Canoe Racing Association Inc	Outrigger Canoeing	Unfunded	National sporting organisation
Australian Polo Federation	Polo	Unfunded	National sporting organisation
Australian Sailing	Sailing / Yachting	Funded	National sporting organisation
Australian Taekwondo	Taekwondo	Funded	National sporting organisation
Australian Underwater Federation	Underwater Sports	Unfunded	National sporting organisation
Australian Weightlifting Federation Limited	Weightlifting	Funded	National sporting organisation
Badminton Australia	Badminton	Funded	National sporting organisation
Baseball Australia	Baseball	Funded	National sporting organisation
Basketball Australia	Basketball, Wheelchair Basketball	Funded	National sporting organisation
Blind Sports Australia	Blind Sports, Goalball	Funded	National sporting organisation for people with disability
Bobsleigh and Skeleton Australia Ltd (formerly Sliding sports Australia)	Bobsleigh, Skeleton	Unfunded	National sporting organisation
Bocce Australia	Bocce	Funded	National sporting organisation
Boccia Australia	Boccia	Funded	National sporting organisation
Bowls Australia	Bowls	Funded	National sporting organisation
Boxing Australia	Boxing	Funded	National sporting organisation
Cricket Australia	Cricket	Unfunded	National sporting organisation

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Croquet Australia	Croquet	Unfunded	National sporting organisation
DanceSport Australia	DanceSport	Unfunded	National sporting organisation
Darts Australia	Darts	Unfunded	National sporting organisation
Deaf Sports Australia	Deaf Sports	Funded	National sporting organisation for people with disability
Disability Sports Australia	Wheelchair Basketball, Wheelchair Rugby, Wheelchair Sports	Funded	National sporting organisation for people with disability
Disabled Wintersport Australia	Disabled Wintersport	Funded	National sporting organisation for people with disability
Diving Australia Ltd	Diving	Funded	National sporting organisation
Equestrian Australia	Equestrian, Equestrian - Disabled	Funded	National sporting organisation
Floorball Australia	Floorball	Unfunded	National sporting organisation
Football Australia	Football (Soccer), Indoor Football / Futsal	Funded	National sporting organisation
Gaelic Football & Hurling Association of Australasia	Gaelic Football and Hurling	Unfunded	National sporting organisation
Golf Australia	Golf	Funded	National sporting organisation
Gridiron Australia	Gridiron	Unfunded	National sporting organisation
Gymnastics Australia Ltd	Gymnastics	Funded	National sporting organisation
Handball Australia	Handball	Unfunded	National sporting organisation
Hockey Australia	Hockey	Funded	National sporting organisation

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Ice Hockey Australia	Ice Hockey	Unfunded	National sporting organisation
Ice Skating Australia Inc	Ice Skating	Unfunded	National sporting organisation
Judo Australia	Judo	Funded	National sporting organisation
Kiteboarding	Kiteboarding	Unfunded	National sporting organisation
Kung Fu Wushu Australia Ltd	Kung Fu - Wushu	Unfunded	National sporting organisation
Lacrosse Australia	Lacrosse	Funded	National sporting organisation
Modern Pentathlon Australia	Modern Pentathlon	Funded	National sporting organisation
Motorcycling Australia Ltd	Motorcycling	Funded	National sporting organisation
Motorsport Australia	Motor Sport	Funded	National sporting organisation
Muaythai Australia	Muaythai	Unfunded	National sporting organisation
National Campdraft Council of Australia	Campdraft	Unfunded	National sporting organisation
National Rugby League	Rugby League	Funded	National sporting organisation
Netball Australia	Netball	Funded	National sporting organisation
Olympic Winter Institute of Australia	Ice Racing, Skiing, Snowboarding	Funded	National sporting organisation
Orienteering Australia	Orienteering	Funded	National sporting organisation
Paddle Australia	Canoeing	Funded	National sporting organisation
Paralympics Australia	Goalball, Paralympics, Wheelchair Rugby	Funded	National sporting organisation for people with disability

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Petanque Federation Australia	Petanque	Unfunded	National sporting organisation
Polocrosse Association of Australia	Polocrosse	Funded	National sporting organisation
Pony Club Australia Ltd	Equestrian, Pony Clubs	Funded	National sporting organisation
Riding for the Disabled Association of Australia	Equestrian - Disabled	Funded	National sporting organisation for people with disability
Rowing Australia Ltd	Rowing	Funded	National sporting organisation
Rugby Australia	Rugby Union	Funded	National sporting organisation
Shooting Australia	Shooting	Funded	National sporting organisation
Skate Australia Inc	Roller Sports, Skate	Funded	National sporting organisation
Skipping Australia	Skipping	Unfunded	National sporting organisation
Snow Australia	Disabled Wintersport, Skiing, Snowboarding	Funded	National sporting organisation
Softball Australia	Softball	Funded	National sporting organisation
Special Olympics Australia	Intellectual Impairment Sports	Funded	National sporting organisation for people with disability
Sport Climbing Australia	Sport Climbing	Unfunded	National sporting organisation
Sport Inclusion Australia	Intellectual Impairment Sports	Funded	National sporting organisation for people with disability
Squash Australia Ltd	Squash	Funded	National sporting organisation
Surf Life Saving Australia	Surf Life Saving	Funded	National sporting organisation
Surfing Australia	Surfing	Funded	National sporting organisation

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Swimming Australia Ltd	Swimming	Funded	National sporting organisation
Table Tennis Australia	Table Tennis	Funded	National sporting organisation
Tennis Australia	Tennis	Funded	National sporting organisation
Tenpin Bowling Australia Ltd	Tenpin Bowling	Funded	National sporting organisation
Touch Football Australia	Touch	Funded	National sporting organisation
Transplant Australia	Transplant	Funded	National sporting organisation for people with disability
Triathlon Australia	Triathlon	Funded	National sporting organisation
UniSport Australia	University Sport	Funded	National sporting organisation
Volleyball Australia	Volleyball	Funded	National sporting organisation
WAKO Australia	Kick Boxing	Unfunded	National sporting organisation
Water Polo Australia Limited	Water Polo	Funded	National sporting organisation
Waterski & Wakeboard Australia	Wakeboard, Water Skiing	Funded	National sporting organisation
Wheelchair Rugby	Wheelchair Rugby	Unfunded	National sporting organisation for people with disability
Wrestling Australia Inc	Wrestling	Funded	National sporting organisation

Appendix B – Agency deliverables as detailed in the Portfolio Budget Statements

Deliver an innovative and informed anti-doping program – we conduct anti-doping tests across a range of sports, based on doping risk in accordance with criteria specified in the World Anti-Doping Agency's International Standard for Testing and Investigations. We maintain existing collaborations with the National Measurement Institute, Australian Border Force and Therapeutic Goods Administration, as well as with NSO/Ds and International Sporting Federations. A strong education program underpins our entire anti-doping program. In 2021–22, our anti-doping online education courses were completed 58,273 times and we delivered 86 anti-doping presentations.

Provide a transparent, independent assessment and review process to address integrity issues - In March 2021, we launched the NIF, which incorporates an independent complaint handling process managed by Sport Integrity Australia. In the 2020–21 Budget, government provided funding for to pilot the independent complaints handling model for an initial period of 2 years, commencing 1 January 2021, and lapsing 31 December 2022. Subsequently, funding was extended to 30 June 2024

Advocate for NSO/Ds to adopt and implement a comprehensive NIF - Since the release of the NIF, we have worked with sports to assist them to adopt its comprehensive suite of policies. The NIF takes a proactive approach to mitigating the threats to sports integrity. It consists of a suite of 5 policy templates for specific integrity threats, 4 of which align with our legislative definition of integrity threats. The NIF provides sports, and the sector more broadly, with a consistent set of policies for the whole sport – one sport, one framework, from elite to grassroots. By adopting the NIF, sports receive access to our independent complaints handling service.

Establish a national platform for information sharing with all partners to address integrity threats/risks - With the launch of the independent complaint handling process the national strategy was focused on building, strengthening and formalising relationships. This was initially with relevant law enforcement agencies to facilitate the dissemination of relevant information obtained through the complaint handling mechanism. We are engaged with all 7 state law enforcement agencies and the Australian Federal Police. This process has led to the establishment of relevant relationships for the immediate sharing of information, the development of an overarching strategy commitment and continues to progress with formalising individual memoranda of understanding with each agency.

Establish a Whistle-blower Scheme to enable confidential reporting of integrity threats - we administer a whistleblowing scheme encompassing all integrity issues in sports and a related source protection framework. While integrated with the rest of our framework for complaint handling and resolution, the Whistleblowing Scheme is focused on protecting and supporting 'insiders' within sporting organisations and related entities in the relevant sporting codes.

Advocate a culture of child safeguarding and member protection across all levels of sport - the SSCIP provides sports with education, training, and ongoing support to ensure organisations are equipped to provide safe and inclusive environments for all members, including children. The program is part of the Commonwealth Action Plan to Prevent and Respond to Child Sexual Abuse, which works alongside the National Strategy of the same name. Announced in 2021, we received an additional \$4.9 million over 3 years to raise awareness and drive cultural change among sports, in partnership with the National Office for Child Safety.

Ensure Australia ratifies the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) – we are collaborating with stakeholders and government partners to progress the ratification of the Macolin Convention. Ratification work involves a thorough examination of all relevant legislation and consideration by government of the potential impacts across stakeholders. This legislative examination and consideration by parliament is consistent with Australia's approach to all treaties and international commitments. We continue to be actively involved in international initiatives to strengthen the international framework to combat the manipulation of sporting competitions and betting-related corruption. We continue to contribute to, and engage with, the International Partnership Against Corruption in Sport (IPACS), the Group of Copenhagen, INTERPOL's Match-Fixing Task Force (IMFTF), the Asian Racing Federation Council on Anti-Illegal Betting and Related Financial Crime, Europol and United Nations Office on Drugs and Crime's (UNODC's) Programme on Safeguarding Sport from Corruption and Crime.

Appendix C – Decision Process

Date	Decision Maker	Context
31/07/23	Office of Impact Analysis	Informal first pass review of Safety In Sport Impact Analysis
05/09/23	Office of Impact Analysis	Informal second pass review of Safety In Sport Impact Analysis
05/09/23	Sport Integrity Australia Executive	Review and feedback on Safety In Sport Impact Analysis
11/09/23	Sport Integrity Australia CEO	Endorsement of Safety In Sport Impact Analysis, signing of Formal First Pass letter and lodgement with Office of Impact Analysis for Formal First Pass Assessment
11/09/23	Department of Health Budget Branch	Draft Impact Assessment provided to support the Safety In Sport NPP at Exposure Draft
13/09/23	Office of Impact Analysis	Lodgement of First Pass Safety In Sport Impact Analysis
18/09/23	Sport Integrity Australia Executive	Review of Safety In Sport Impact Analysis incorporating comments and feedback on First Pass from Office of Impact Analysis
19/09/23	Sport Integrity Australia CEO	Endorsement of Safety In Sport Impact Analysis, signing of Second Pass letter and lodgement with Office of Impact Analysis for Second Pass Assessment
20/09/23	Office of Impact Analysis	Lodgement of Second Pass Safety In Sport Impact Analysis