

# Impact Analysis

# Sport Integrity

# Australia – Funding

# (terminating measure)

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# Key Terms

AAG Sport Integrity Australia's Athlete Advisory Group

ACIC Australian Criminal Intelligence Commission

AFP Australian Federal Police

ASADA Australian Sports Anti-Doping Authority

ASC Australian Sports Commission

ASDMAC Australian Sports Drug Medical Advisory Committee

ASF Australian Sports Foundation

ASWS Australian Sports Wagering Scheme

CEO Chief Executive Officer

INTERPOL International Criminal Police Organisation

MOU Memorandum of Understanding

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

This Impact Analysis (IA) explores the impacts of policy options to address and stay ahead of highly sophisticated and evolving doping methodologies and integrity threats at a time of heightened public expectation and external scrutiny.

Each of the options propose a scalable approach to address and manage the evolving threats and opportunities. The IA frames these options against selected recommendations of 2018 review of Australia's sports integrity arrangements (the Wood Review) and the 2019 Government response to the Wood Review - *The Safeguarding the Integrity of Sport*<sup>1</sup>. The Wood Review is the most comprehensive examination of sports integrity arrangements ever undertaken in Australia.

This IA defines the problem as *'threats to sport have become more sophisticated, and ever evolving, and without integrity underpinning participation, the great benefits that sport delivers to the Australian community will be lost.'* The problem encompasses key recommendations from the Wood Review, and the two themes of (i) Enhancing Australia's anti-doping capability, and (ii) A National Sports Integrity Commission (Sport Integrity Australia).

Provision of ongoing funding to Sport Integrity Australia would ensure fairness and safety of Australian sport and its participants through the coordination of a national approach to all sport integrity matters through an established, independent and trusted agency. It would continue delivery of core capabilities to ensure the Green and Gold decade of events is protected from the scourge of performance and image enhancing drugs (PIEDSs) and competition manipulation.

The policy options proposed are also considered against the risks of maintaining the status quo. Options address critical capability gaps in the current Australian doping and integrity system.

**Option 1** (maintaining the status quo) - would only partially implement recommendations of the Wood Review. Over 50% of Sport Integrity Australia's funding to deliver anti-doping and integrity functions across all levels of sport ceases on 30 June 2024. The capacity of the agency would return to pre-2018 levels, when it was solely an Anti-Doping agency, leaving it with little to no capacity to maintain independent complaints handling or the framework that protects sport from the threats of abuse, discrimination, mistreatment, safeguarding children and young people, racism, homophobia and gender equality across all levels of Australian sport. Diminished capabilities will not keep pace with sophisticated doping methodologies, would not deliver baseline compliance reflective of changes and new expectations under the World Anti-Doping Code, with a real risk that decreased activity levels may affect our WADA accreditation.

**Option 2** (low cost) - This option would maintain current base level capabilities and continue to deliver priority services in line with 2023-24 activity levels. This option would address the problem through continuation of current levels of anti-doping activities, complaint handling, education and capacity building initiatives for sports and participants.

**Option 3** (medium cost) - This option would provide a modest uplift in capability and deliver priority activities and services in line with 2023-24 activity levels. This option would address the problem through continuation of current levels of activities and services with a significantly enhanced anti-doping testing capabilities to respond to evolving WADA requirements, enhanced capabilities such as intelligence, investigations, education programs and platforms, increased support of Pacific partners, and funded integrity managers within state sports.

**Option 4** (high cost) - This option would provide a major uplift in capability and deliver priority activities and services informed by contemporary research and evidence-based policies and initiatives. This option would address the problem through increased levels of activities and services along with additional capabilities of option 3 plus a Sport Integrity Research Institute, a proportional increase in complaint handling capacity, public information campaigns and enhanced education services.

This IA has been developed alongside a process of continual consultation to inform policy development and will continue to ensure the identified impacts of the selected policy option are managed and outcomes can be evaluated for effectiveness.

After assessing the overall net benefit to all impacted segments, Option 4 was determined to deliver the greatest net benefit and will be recommended to government for their consideration against whole of government priorities and assessment criteria. Option 4 provides full implementation of Wood's recommendations along with addressing the 4 key threats driving the problem statement.

This IA was subject to an early assessment and was assessed as sufficient to inform early decisions and was used to inform the final policy authority decision.

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<sup>1</sup> [Safeguarding the Integrity of Sport | Australian Government Department of Health and Aged Care](#)

# Introduction

In excess of 50% of Sport Integrity Australia's funding to deliver anti-doping and integrity functions across all levels of sport ceases on 30 June 2024. This is at a time when threats to sport have become more sophisticated. Without integrity underpinning participation, the great benefits that sport delivers to the Australian community are at risk of being lost. From doping to safety to match fixing, those who seek to undermine the integrity of Australian sport are becoming more sophisticated and we must build stronger barriers.

Anti-doping capabilities and activities include testing, education, intelligence gathering, investigations and stakeholder engagement and support to the Pacific region.

Integrity capabilities and activities include complaint handling, investigations, education and support to sports in implementing the National Integrity Framework (NIF). The NIF is supported and enabled by funded National Integrity Managers (NIMs) that are embedded within National Sporting Organisations and National Sporting Organisations for People with Disability (NSO/NSODs).

Funding is also provided to the Australian Criminal Intelligence Commission (ACIC) for the Australian Sports Intelligence Unit (ASIU) to address the threat of competition manipulation and identify and address risks of serious and organised crime within sport.

The proposal would provide ongoing funding to Department of Industry, Science and Resources (DISR), through the National Measurement Institute (NMI), for the maintenance and enhanced capability of the Australian Sports Drug Testing Laboratory (ASDTL) and continued anti-doping sample analysis for Sport Integrity Australia. The ASDTL is a World Anti-Doping Agency (WADA) accredited laboratory, providing independent expert analysis of samples collected through the Sport Integrity Australia's anti-doping program. Without the ASDTL's existence, Australia would be unable to host major international events, most importantly the 2032 Olympics and Paralympics (the Games). Funding for the ASDTL also terminates on 30 June 2024.

The benefits to Australia of hosting major events extend beyond the event itself. The 2030-National Sport Plan<sup>2</sup> identified the benefits of hosting major sporting events to include:

- tourism – international, interstate and intrastate
- trade – both direct and indirect business activity generated by sporting events
- employment – event organisers, commercial partners, service providers
- infrastructure – legacy benefits of new and improved stadiums, sporting, transport and other public facilities
- gender equality – creating fair, safe and inclusive opportunities in, and through, sport
- communities – uniting people, strengthening local communities and instilling national pride
- participation – creating role models who motivate and inspire children and adults to be active and play sport.

The IA does, at points, analyses similar issues and impacts to the recently announced Safety in Sport NPP that was considered, and approved, at MYEFO 2023-24. The objectives and initiatives of the Safety in Sport NPP cannot be achieved without maintaining foundational capabilities for anti-doping and the integrity of sport. This NPP does not duplicate any activities funded in the Safety in Sport announcement. Safety in Sport funding has enhanced Sport Integrity Australia's role to address safety in sport and provide capability to deliver its remit to address bullying, abuse, intimidation, vilification, discrimination, harassment and sexual misconduct. It will enable delivery of a number of new initiatives and enhanced capabilities, specifically:

- development of a new Empowering Women and Girls in Sport initiative as a key step towards addressing sport integrity issues facing women and girls
- development of a new First Nations skills program to understand and address disparities in participation and administration across sport
- in acknowledgement that education is key to raising awareness of and deterring inappropriate behaviour in sport - it will provide enhancement of existing education services to be gender and culturally sensitive, and cover bullying, harassment, discrimination, and emerging safety issues, to reach participants all levels of sport including those with disabilities
- enhancement of the Safe Sport Hotline and triage referral and reporting service
- provision of wellbeing services and psychologist for staff, athletes, and support personnel
- a targeted communication strategy highlighting and addressing racism in sport
- establishment of an advisory committee to support Sport Integrity Australia's Cultural Advisor, to provide further representation of the different Indigenous cultures across Australia.

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<sup>2</sup> [Home - National Sport Plan \(sportaus.gov.au\)](https://sportaus.gov.au)

# Background and current setting

## What does sport in Australia currently look like?

Sport is an important part of life in Australia with more than 90% of adults having an interest in sport. Some 15.8 million Australians participated in sport annually, either through an organisation or venue. In 2022, an estimated 3.4 million Australians participated in non-playing roles in the sport and active recreation sector at least once. Over 90% of these participants (3.1 million) were volunteers directly enabling the estimated 70,000+ registered not-for-profit sports clubs currently operating in Australia<sup>3</sup>.

Sport has wider social and economic benefits. It is considered a force for social change, increasing acceptance of women and people with disabilities as sporting role models. It is an important part of the economy, generating an estimated \$32 billion annually in sales and supporting 128,000 jobs.<sup>4</sup>

International success by Australian athletes inspires people to take up sport and is a source of national pride.<sup>5</sup>

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”*<sup>6</sup>. Sport *“delivers social inclusion and, importantly, social resilience. It builds connectivity in society”*<sup>7</sup>.

Research conducted by the Confederation of Australian Sport and by the Australian Sports Commission<sup>8</sup> over the past 5 years show the enormous contribution that sport makes to the Nation in many ways.

- 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 [great benefits that sport](#), and physical activity makes to individuals from a preventative health perspective and in contributing to positive attitudes and mental wellbeing ([Figure 12](#)) great benefits that sport delivers
- 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.

The FIFA Women's World Cup (FWWC) has, and other international events of the 'Green and Gold decade' culminating with the 2032 Brisbane Olympics and Paralympics Games, will further ignite Australia's interest in sport. These events coupled with specific infrastructure and participation initiatives will increase the participation and involvement in sport.

There is a 30% drop-out rate from children and young people in organised sport aged between 9 and 19<sup>9</sup>. There is evidence<sup>10</sup> that drop-out from organised sports has associated health detriments. For example, children and adolescents who dropped out of organised sports reported lower physical activity, greater body fat and greater depression at age 20 than those who continued participation. Similarly, children who dropped out of organised sports between ages 8 and 10 reported lower health-related quality of life and greater psychological difficulties at age 10. The reasons for which children and adolescents drop out of sport include, but are not limited to injury, intrinsic pressures and pressure from other agents (e.g., parents, coaches), inadequate resources and other social pressures.

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<sup>3</sup> June 2023 AUSPLAY

<sup>4</sup> [Sports Industry Economic Analysis | Australian Government Department of Health and Aged Care](#)

<sup>5</sup> [About sport in Australia | Australian Government Department of Health and Aged Care](#)

<sup>6</sup> Skinner, Zakus & Cowell, 2008

<sup>7</sup> Bernard Salt (2012)

<sup>8</sup> Confederation of Australian Sport\_website [Welcome to The Confederation of Australian Sport - Sport CA \(sportforall.com.au\)](#)

<sup>9</sup> AusPlay\_national population tracking survey.

<sup>10</sup> [University](#) of Wollongong\_Prevalence of drop-out from organised extracurricular sport (JAN2020)

## Remit and diversification

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

### Where we were

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

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 then 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 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<sup>11</sup>. The report was publicly released in 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 the 5 key themes of:

- 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.

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<sup>11</sup> [Sport 2030 \(sportaus.gov.au\)](https://sportaus.gov.au)



## Where we are now

We are part of the Department of Health and Aged Care Portfolio, established as an independent statutory agency to prevent and address threats to sports integrity and coordinate a national approach to matters relating to sports integrity in Australia with a view to:

- achieving fair and honest sporting performances and outcomes
- promoting positive conduct by athletes, administrators, officials, supporters and other stakeholders, on and off the sporting arena
- achieving a safe, fair and inclusive sporting environment at all levels
- enhancing the reputation and standing of sporting contests and of sport overall.

We coordinate all elements of the national sports integrity threat response including prevention, monitoring, disruption and detection, investigation and enforcement. We provide a single point of contact for athletes, sporting organisations, law enforcement bodies and other stakeholders for matters relating to sports integrity.

Our responsibilities include being Australia’s National Anti-Doping Organisation (NADO), providing a comprehensive anti-doping program for the Australian sport community and administering the NIF which is a set of policies all members of sports need to follow when it comes to their behaviour and conduct in sport.

To protect the health of athletes and the integrity of Australian sport, we have 3 primary areas of focus:

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

We fulfil Australia’s responsibilities to the Council of Europe Anti-Doping Convention and the United Nations Educational, Scientific and Cultural Organization (UNESCO) International Convention against Doping in Sport, which is a requirement for Australia to compete at international events such as the Olympic and Paralympic Games. As a signatory to the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention), we participate in the global response to combat the threat of competition manipulation on sports in Australia.

We are a non-corporate Commonwealth entity under the Public Governance, Performance and Accountability Act 2013 (PGPA Act) and our staff are employed under the Public Service Act 1999. Sport Integrity Australia operates under the Sport Integrity Australia Act 2020 and the Sport Integrity Australia Regulations 2020, including the National Anti-Doping (NAD) scheme. Our activities are also governed by our obligations to implement the World Anti-Doping Code and International Standards in Australia.

Figure 1 highlights key activities of Sport Integrity Australia in 2022-23

Figure 1



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 NADO. It 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 the following key activities.

- Anti-doping and integrity investigations
- Review of scientific / testing results
- Planning and management of anti-doping testing missions
- Education and related activities to prevent non-compliance
- Triage, assessment and dissemination of incoming information.

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 Safety in Sport initiative was announced September 2022<sup>12</sup> 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. The government's commitment to Safety in Sport was recently strengthened with its approval on ongoing funding through the recent 2023-24 MYEFO process<sup>13</sup>.

This has allowed an expansion of the capability of the 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.

Ratification of the Macolin Convention and establishment of National Sport Integrity Offences were also announced through the 2023-24 MYEFO process. These address 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.

## Where we need to be

### 2024 and beyond: Sport Integrity Australia – Australia's National Anti-Doping Organisation (NADO) and expanded integrity remit

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.

This IA discusses impacts the Australian sporting ecosystem to provide decision makers with an understanding of the relationship between threats, activities and stakeholders.

Sports and participants continue to be challenged by a range of growing threats including increasing sophistication and extent of doping, globalisation of sports wagering particularly through rapidly growing illegal online gambling markets, infiltration and exploitation of the sports sector by organised crime, corruption in sports administration, and growing member protection issues particularly the sexual abuse of minors in sporting environments.

The future of sport integrity in Australia requires:

**A sophisticated anti-doping framework and to remain a signatory to the World Anti-Doping Code.** This will require sophisticated and cutting-edge capabilities to deliver the Green and Gold decade of events protected from the scourge of PIEDs. We must continue to build upon the current capabilities and activities to become a contemporary, sophisticated and proactive regulator. Cheating in sport using PIEDs has, in some cases, become more sophisticated than Sport Integrity Australia's current 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.

<sup>12</sup> [SAFETY IN SPORT DIVISION TO PROTECT AGAINST ABUSES OF POWER | Sport Integrity Australia](#)

<sup>13</sup> [Australian Government bolsters safeguards in sport \(sportintegrity.gov.au\)](#)

Maintaining the ASDTL is a critical element of our future and a key enabler to hosting the 2032 Games. The ASDTL is a WADA accredited laboratory, providing independent expert analysis of samples collected through the Sport Integrity Australia's anti-doping program. Without the ASDTL's existence, Australia would be unable to host major international events, most importantly the 2032 Games.

**Intelligence led operations.** 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. 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.

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.

Sports will directly benefit from receiving the outcomes of this work, building their capability to identify threats and report them to Sport Integrity Australia, 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 further develop international capability. This will contribute to Sport Integrity Australia being recognised as a global leader in addressing threats to sports integrity.

**Contemporary and evidenced based policy and services.** To ensure Sport Integrity Australia's programs and services are fit for purpose to deal with contemporary and emerging issues and threats and enable evidence-based policy advice and capability development, a Sport Integrity Research Institute (within existing governance arrangements) would be established through partnering with Australian Universities. It would ensure programs and services are fit for purpose to deal with contemporary and emerging issues and threats and enable evidence-based policy advice and capability development. It will also provide additional capacity to liaise with sport and develop research programs, build national and international partnerships and strategies that address a range of contemporary doping and integrity issues.

Provision of ongoing funding to Sport Integrity Australia would provide enhanced capabilities, expanded capacity, partnerships and access to research to achieve against where the government, sport and our stakeholders need us to be. It will ensure fairness in Australian sport through the coordination of a national approach to all sport integrity matters through an established, independent and trusted agency.

The specific initiatives contained within each of the options are discussed in detail at [Options Section](#). They 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 program<sup>14</sup>, National High Performance Sports Strategy<sup>15</sup>, National Sport Participation Strategy<sup>16</sup>, Building a Sustainable Legacy<sup>17</sup>, National Sport Plan<sup>18</sup> and also the broader Elevate 2042 Strategy<sup>19</sup>.

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<sup>14</sup> [Securing a sporting legacy for women and girls | Prime Minister of Australia \(pm.gov.au\)](#)

<sup>15</sup> [Delivering new National High Performance Sports Strategy | Health Portfolio Ministers | Australian Government Department of Health and Aged Care](#)

<sup>16</sup> [National Sport Participation Strategy | Australian Sports Commission \(ausport.gov.au\)](#)

<sup>17</sup> [Building a sustainable legacy | Clearinghouse for Sport](#)

<sup>18</sup> [National Sport Plan - Shaping the future direction of sport in Australia - Australian Government Department of Health - Citizen Space](#)

<sup>19</sup> [Brisbane 2032 Olympic and Paralympic Games Legacy Strategy \(amazonaws.com\)](#)

# 1 What is the policy problem you are trying to solve and what data is available

## 1.1 The problem

Integrity in Australian sport can be defined (the definition) as *‘the manifestation of the ethics and values which promote community confidence in sports, including fair and honest performances and outcomes, unaffected by illegitimate enhancements or external interests; and positive conduct by athletes, administrators, officials, supporters and other stakeholders, on and off the sporting arena, which enhances the reputation and standing of the sporting contest and of sport overall.’*<sup>20</sup>

The definition purposely involves a multifaceted concept that is capable of capturing the full range of corrupt activity within sport. A wide definition is required because the threats to sports integrity can be identified across a broad spectrum of activities, ranging from those involving serious and organised crime through to minor issues of ethics and behavioural values. It can impact on all manner of stakeholders and reach almost every aspect of the sporting environment, including the sporting contest itself, the way that athletes are managed and developed within sporting organisations, player transfers, the governance and general management of sporting organisations and clubs, appointment of individuals to governing bodies of sporting organisations, sponsorship, media, the marketing for sporting events, and the bidding process for the right to host major international tournaments.

There is a variety of contemporary and publicly available research and data to consider the problem proposition. In excess of 85 separate data and research sources are referenced throughout the IA.

Doping remains a scourge for sport right across the world. Bullying and harassment remains a concern and, sadly, there are those in sport that will prey on children and young people. Match-fixing is rife globally, with organised crime exploiting and undermining sport, corrupting officials and athletes and cheating sports fans. Australia is not immune from these problems, sporadically, the back page news becomes front page headlines when our major sports are rocked by scandal. While we are leaders in the fight against sports integrity threats, more needs to be done.

In the doping context, those involved in the corrupt activity can include athletes, coaches, trainers, managers, sports scientists, testing officials, suppliers of drugs and methods for administration and detection avoidance.

To support these broad assessments, Sport Integrity Australia continually monitors threats to the integrity of sport. In the 2023-24 threat assessment, the key threats were identified as:

- Performance enhancing drugs are almost certainly endemic in the community.
- Children and young people remain vulnerable to abuse in sport
- Discrimination-related matters - racism remains a significant social issue and it exists in all levels of sport
- Competition manipulation.

To support the key threats above, evidence, statistics and reports that further validate the problem and help to quantify its extent are presented under the board headings of [Doping](#) and [Integrity](#).

In the competition manipulation context, those potentially involved include athletes, coaches, support personnel and managers, match officials, wagering service providers and punters.

Figure 2



<sup>20</sup> The Wood Review

Unfortunately, there is a dark side to sport, and it is not always a fair nor a safe place for all of us. The problem is posed as ***'threats to sport have become more sophisticated, and ever evolving, and without integrity underpinning participation, the great benefits that sport delivers to the Australian community will be lost.'***

The propositions within this problem are analysed, evidenced and detailed though this section of the IA.

The construct of the problem is viewed as:

- the gap between the threat and current capabilities = the magnitude of problem (likelihood)
- the impact this gap has on sport, participants and other social, economic and community outcomes = the cost of not doing anything (consequence)
- how can the residual 'gap' and 'impact' be managed = what are our options (managing the risk).

Australians have no tolerance for the corruption of sport. The Wood Review warned 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'* and that *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 that sports generates, and undermines significant investment in sport (more than AU\$300 million in 2016-17)'*.

Sports people at all levels are entitled to know that they are competing on an even playing field. While Australia has always taken a strong stance against doping and other forms of cheating internationally, it is incumbent on us to ensure sport in Australia is protected from external threats, and that our own high sports integrity standards are in order to ensure all Australian sport is safe, fair and inclusive.

As detailed in the 2022 report titled 'The Future of Australian Sport'<sup>21</sup>, as Australia's demographic profile becomes more diverse and social values shift, organised sports in Australia will also transform and reflect these changes.

Persistent societal challenges such as racism, violence, abuse and other poor behaviours in sport have elevated the importance of sports integrity, safety and ethics in the sports industry at all levels. Stronger accountability, reporting structures and advocacy for vulnerable Australians will place further pressures on sports to provide a safe and welcoming place for all.

Community-driven sports clubs will increasingly seek to tap into the benefits of engaging a broader cross-section of Australian society. Many will place more emphasis on providing positive participant experiences and promoting inclusive behaviours on- and off-field. Growth in competing markets and competition for new participants will also provide further impetus for sporting organisations and clubs to implement positive change.

In the coming decades sports organisations will be faced with even stronger social licence obligations and will seek well-informed practices to encourage diversity, inclusivity and fair-play and offer athletes more choice, advocacy and individual expression.

Sport Integrity Australia's capability to adapt and evolve to stay ahead of the ever-increasing volume and complexity of the threats facing sport integrity in Australia, such as the evolving doping methodology, abuse of children in sport, online safety, racism in sport and competition manipulation is not available under the 'status quo' arrangement.

The problem is assessed as being at all levels, not just high-performance programs and national competitions. This will require change from the CEO to the coach, from the elite athlete to the casual participant, through to community sport and grassroots volunteers.

## Doping

Doping is often categorised as 'cheating to win.' This is the deliberate or inadvertent use by an athlete of a substance or method prohibited from sport. Doping is now bigger than individual athletes. State-sponsored institutionalised doping, which continues to be a pronounced threat against international anti-doping efforts, is supported by constant and increased pressure on countries to perform, enhanced access to prohibited substances facilitated by the online world and enhancements in science and pharmaceutical products.

The doping threat level in Australian sport has been assessed in Sport Integrity Australia's 2023 Threat Assessment as **substantial**. There is a realistic possibility that sophisticated doping will not be uncovered by a testing program alone,

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<sup>21</sup> [The future of Australian sport: Megatrends shaping the sport sector over coming decades \(clearinghouseforsport.gov.au\)](#)

requiring a greater focus on proactive intelligence collection and supporting forensic and advanced medical and scientific capabilities.

Prevalence of doping in sports is influenced by many cultural, environmental (e.g., climate, altitude, etc.) or social factors, and the efficiency of the anti-doping strategy is an important feature influencing this prevalence. A summary of some 105 studies, published between 1975 and 2019, were considered in a 2021 review that concluded the doping prevalence rates in competitive sport ranged from 0 to 73% for doping behaviour with most falling under 5%<sup>22</sup>. This is corroborated in other recent studies of doping prevalence suggest doping in athlete cohorts may be as high as 12-30% with the average rate of detection across all anti-doping programs being between 0.5% and 1%.

Further, the broad appeal and participation in women's sport is increasing, leading to increased pressure on performance as it relates to sponsorship, remuneration and social media. At a time when actions and decisions are being scrutinised more closely than ever before, as evidenced by the response from sport and the public to recent high profile doping cases. The need to shift the culture of sport and athlete perception, experience and trust in the process is paramount to success.

WADA has recently flagged the need for NADOs to move their thinking and capability invest decisions away from being reactive to specific doping and integrity scandals and immediate reaction from stakeholders and the public for urgent and effective action, towards a proactive approach, which goes beyond crisis management.

At their November 2023 meeting, WADA outlined the internationally identified trends, opportunities and risks as:

- Proliferation of new doping technologies in pursuit of human high performance
- Anti-doping being increasingly addressed in conjunction with sport integrity issues
- Stronger focus on prevention – education, intelligence and investigations becoming a priority
- Use of Artificial Intelligence (AI), data analytics and machine learning in anti-doping.

Athletes in sub-elite sport are often young, susceptible to societal pressures around image, and may also be seeking a competitive edge for selection for a limited number of sought after opportunities. Using PIEDs at this stage of development has the potential to provide enduring physical benefits throughout an athlete's career, providing an unfair advantage for life, at a time they are less likely to be caught. This may make the reward outweigh perceived risks.

Doping is not the exclusive domain of adult athletes. The January 2024 WADA Report Summary on 'Operation Refuge' which was launched following observations by the WADA Confidential Information Unit in early 2021 of an increase in confidential reporting of doping activity amongst minors (globally). Key findings highlighted that globally:

- Since 2012, there have been 1518 Positive Tests reported against 1416 Minors. Approximately 80% of Positive Tests (or 916 cases) resulted in a doping violation.
- Sports with the most Positive Tests reported against Minors were (in descending order): weightlifting, athletics and aquatics.
- Comparatively, Minors produce a slightly less percentage of Positive Tests than the general population of other athletes.
- Female minors were tested more than male minors, even in sports where there are more male competitors than female.
- Between 2018 and 2023, 58 confidential reports implicating Minors in doping behaviours were received via WADA's confidential reporting platform, 'Speak Up'.

International reporting has shown increases in the amounts of steroids and related agents seized over recent years. According to The World Drug Report, over the past decade the weight (in kilogram equivalent) of steroids seized globally has increased 748%, from 214.5 kilograms in 2010 to 1,818.7 kilograms in 2019. This is a 28% increase from 2018, when 1,423 kilograms was seized. Similarly, the World Customs Organization (WCO) reported that the number of seizures of 'metabolic agents' (including steroids and anti-diabetic agents) increased in 2021, while the number of pieces of metabolic agents within those seizures decreased slightly. Metabolic agents were the most common medical product seized globally in 2021 (WCO 2022).

Steroids and other metabolic agents are among the most commonly abused performance and image enhancing drugs. Steroids are substances similar to the male sex hormone testosterone. They can increase muscle mass and strength and bone density. Examples include Testosterone, Stanozolol and Drostanolone. Other metabolic agents include substances such as insulin, GW1516 and SR9009. These substances are abused for their ability to impact on muscle growth and maintenance.

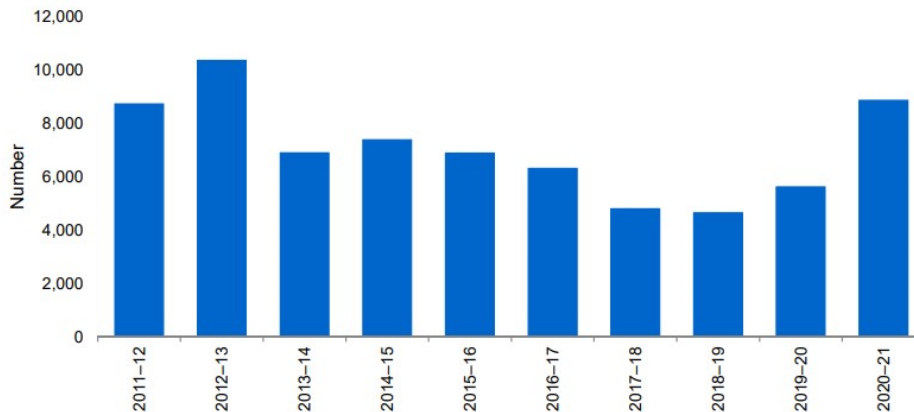
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<sup>22</sup> Doping Prevalence in Competitive Sport: Evidence Synthesis with "Best Practice" Recommendations and Reporting Guidelines from the WADA Working Group on Doping Prevalence\_ 26 April 2021

In 2021, the Australian Federal Police noted over 100% increase in the amount of PIEDs identified. This was attributed to an increase in domestic search warrants, indicating there are far more of these drugs circulating in the community that are generally not otherwise detected by Law Enforcement.

The number of PIED detections at the Australian border increased 1%, from 8,726 in 2011–12 to 8,855 in 2020–21<sup>23</sup>. The number of detections increased 58% this reporting period from 5,614 in 2019–20 (see [Figure 3](#)).

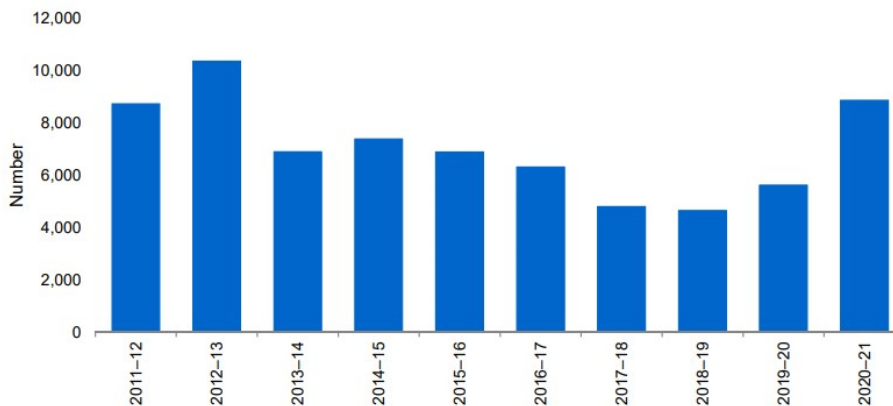
Figure 3: Number of performance and image enhancing drug detections at the Australian border 2011–12 to 2020–21 <sup>24</sup>



While steroid detections remain the greatest proportion of the number of PIED detections at the Australian border, the proportion decreased, from 70% in 2011–12 to 66% in 2020–21 <sup>25</sup> (see [Figure 4](#)):

- The number of steroid detections increased 64% from 3,584 in 2019–20 to 5,861 in 2020–21
- The number of hormone detections increased 47% from 2,030 in 2019–20 to 2,994 in 2020–21
- The number of clenbuterol detections increased 149% from 152 in 2019–20 to 378 in 2020–21.

Figure 4: Number of PIED detections, by category, at the Australian border 2011–12 to 2020–21<sup>26</sup>



The number of national steroid arrests increased 158%, from 511 in 2011–12 to a record 1,320 in 2020–21<sup>27</sup>. The number of steroid arrests increased 14% this reporting period, from 1,160 in 2019–20. Consumer arrests continue to account for the greatest proportion of arrests, accounting for 82% of national steroid arrests in 2020–21 (see [Figure 5](#))

<sup>23</sup> ACIC Drug Data Report\_2020-21

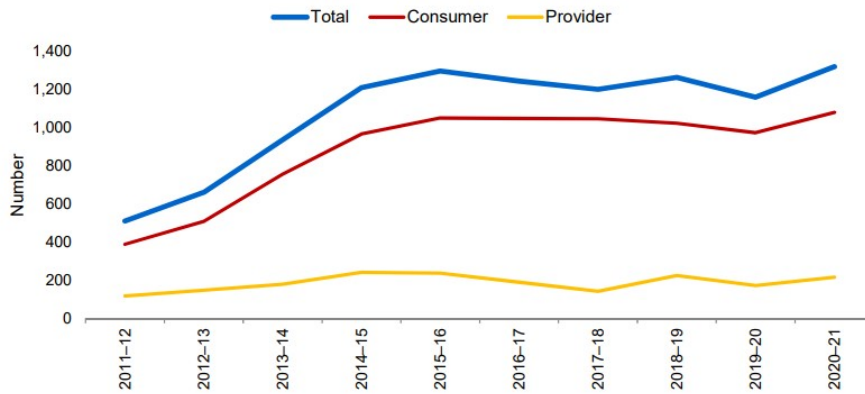
<sup>24</sup> Department of Home Affairs

<sup>25</sup> ACIC Drug Data Report\_2020-21

<sup>26</sup> Department of Home Affairs

<sup>27</sup> ACIC Drug Data Report\_2020-21

Figure 5: Number of National steroid arrests in 2020, 2011-12 to 2020-21



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.

*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.'

### Broad Integrity Issues

Persistent societal challenges such as sexism, homophobia, racism, abuse and other general poor conduct and behaviours in sport have elevated the importance of safety and integrity in the sports industry at all levels<sup>28</sup>.

Protecting those with increased vulnerabilities in sport from bullying, harassment and abuse is an increasing area of responsibility, particularly following the Royal Commission into the Institutional Response to Child Sexual Abuse<sup>29</sup>. NSOs/NSODs have legal obligations to prevent and address discrimination and harassment and to protect children and young people from abuse.

In the past 3 years, more than half of the 1,300 of the non-doping integrity related matters received by Sport Integrity Australia concerned alleged prohibited conduct against women or girls. Child Safeguarding concerns accounted for 80% of these matters with the majority raising concerns over relationships between men coaches and young girl athletes. In a recent study conducted by Victoria University, 82% of people surveyed reported experiencing at least one form of interpersonal violence when participating in community sport as a child. In the past three years, over 190 referrals have been made to law enforcement for consideration of action.

Sport Integrity Australia research has found that sportswomen received three times as many negative comments as men (27% versus 9%) when it comes to online abuse. Over a quarter of all comments towards sportswomen were negative, sexist, sexualised, or belittled women's sports.

The Australian Human Rights Commission (AHRC) 2021 report<sup>30</sup> 'Change the Routine' engaged with members and former members across the gymnastics community in Australia, and undertaking a high-level evaluation of policy and procedures, the Review led to a comprehensive understanding of the culture of the sport, including systemic risk factors for child abuse and neglect, misconduct, bullying, abuse, sexual harassment and assault towards athletes. Some of these risk factors also exist in many other sports, including significant power disparities between athletes and coaches and administrators. However, the Commission found that unique facets of gymnastics, including the extremely high proportion of young female athletes, contribute to a high-risk environment for abuse and for the maintenance and reinforcement of negative societal stereotypes and ideals around gender.

The AHRC also identified a 'win-at-all-costs' culture that prevailed across the sport and found that this created unacceptable risks for the safety and wellbeing of often very young gymnasts.

<sup>28</sup> [The future of Australian sport: Megatrends shaping the sport sector over coming decades \(clearinghouseforsport.gov.au\)](https://clearinghouseforsport.gov.au/)

<sup>29</sup> [Royal Commission into Institutional Responses to Child Sexual Abuse \(childabuseroyalcommission.gov.au\)](https://childabuseroyalcommission.gov.au/)

<sup>30</sup> [Change the Routine: Report on the Independent Review into Gymnastics in Australia \(2021\) | Australian Human Rights Commission](https://www.hrc.org.au/publications-reports/change-the-routine-report-on-the-independent-review-into-gymnastics-in-australia-2021/)



The key recommendation relevant to this IA was recommendation 9 – ‘All matters regarding child abuse and neglect, misconduct, bullying, sexual harassment, and assault be investigated externally of the sport’ Specifically it referenced Sport Integrity Australia’s complaint handling process and adoption of the NIF as key actions.

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’<sup>31</sup>. ‘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’<sup>32</sup>, and ‘sports clubs or sports media organisations can communicate with fans and spectators, presenting news stories and live scores with immediacy and exponential reach’<sup>33</sup>.

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.

*Example:* FIFA Women’s World Cup 2023T saw discriminatory, abusive or threatening content targeted at over 150 players (out of 697 active players). Homophobia was prolific with almost twice the % vs FIFA World Cup Qatar 2022. Sexualised content was also prolific<sup>34</sup>.

### **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.

Many sports participants still endure the harmful and discriminatory attitudes of the broader Australian society. 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<sup>35</sup>. The National LGBTI Health Alliance found 56% of all participants and 72% of gay men believe homophobia is more common in Australian sport than the rest of society.

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.

A study titled ‘*Girls and women in Australian football umpiring: understanding registration, participation and retention*’<sup>36</sup> 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

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<sup>31</sup> Kavanagh & Jones, 2017

<sup>32</sup> Guerin-Eagleman & Burch, 2016

<sup>33</sup> Kavanagh, Litchfield, & Osborne, 2021

<sup>34</sup> [FIFA-Social-Media-Protection-Service-FIFA-Women-s-World-Cup-2023-tournament-analysis.pdf](#)

<sup>35</sup> Symons, O’Sullivan & Polman, 2017

<sup>36</sup> [girls-and-women-in-afl-umpiring-report-final.pdf \(clubrespect.org.au\)](#)

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.

Sport provides a unique context for bullying behaviours to occur. 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<sup>37</sup>.

Broadly defined as 'member protection' issues, abuse, bullying, harassment, sexual misconduct, unlawful discrimination, victimisation, and vilification were the most prevalent subject of integrity complaints received by Sporty Integrity Australia.

**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<sup>38</sup>.*

### **Abuse of Children in Sport**

Children and young people remain vulnerable to abuse in sport. Current Australian state and territory legislation is inconsistent in regards the definition and criminality of grooming, and does not effectively protect children from grooming and abuse that does not meet a criminal threshold.

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 Safeguarding Children and Young People Policy or an allegation of discrimination. Any matter that involves a child or young person 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.

82% 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. 66% said they had experienced psychological violence or neglect, 66% reported physical violence and 38% 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.

Sport Integrity Australia's Annual Strategic Threat Assessment aims to strengthen 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.

UK research<sup>39</sup> undertaken to understand the negative experiences and harm in sport surveyed over 6,000 young people (age 18-22) 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.

**Example:** *Sexual abuse of minors in sporting environments as demonstrated in the 2020 AHRC 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.*

### **Manipulation of Sporting Competitions**

The manipulation of sporting competitions is often categorised as 'cheating to lose.' This is primarily manifested as wagering-related match-fixing, where those with a capacity to influence the outcome of an event or a feature within it

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<sup>37</sup> Kerr, Jewett, MacPherson and Stirling (2016)

<sup>38</sup> Codesports April 21, 2023

<sup>39</sup> Alexander, Stafford and Lewis (2011)

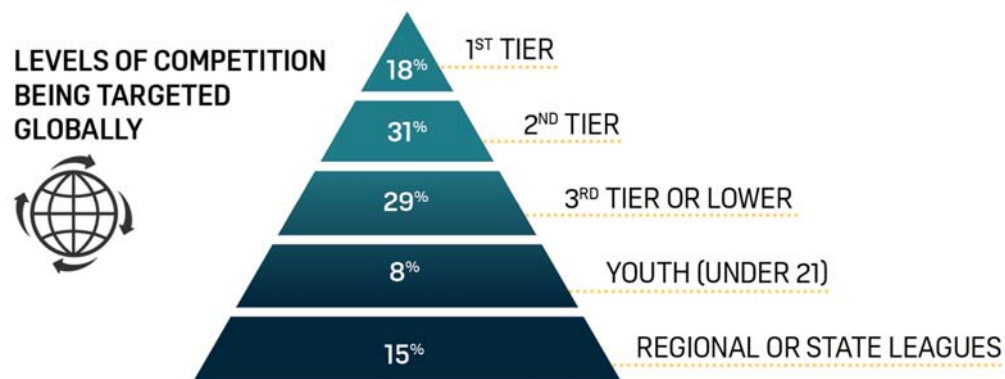
contrive to do so as to achieve to profit from a wager or some other pecuniary benefit. It is no less a threat to sports integrity than doping.

Competition manipulation intentionally removes all, or part of, the unpredictable nature of competition to obtain an undue benefit, generally financial or competition related. It can include the deliberate fixing of the result of a contest, deliberate misapplication of the rules of a contest, interference with the play or playing surfaces, or manipulating scores.

Non-betting related competition manipulation may involve attempts to secure a favourable rank/tier, points or competition draw, for example, an opposing team or competitor could be paid, or promised a future favour to intentionally lose a game. It may also involve prize money. The ability to manipulate a competition relies on the involvement of a person with the ability to influence the outcome, or an element of, a sporting event, including athletes, match officials, ground and stadium staff. Participants that are financially insecure, or partake in activities that expose them to extortion, may be targets for exploitation.

Serious and organised criminals may be motivated to manipulate competitions due to a range of factors, including potential high profit, low risk, anonymity, and ability to exploit vulnerabilities. Athletes and sports are more likely to be approached to engage in competition manipulation if they have existing criminal associations.

Figure 6: levels of competition targeted globally



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.

While financial gain is a key motivation for engaging in competition manipulation, it is not the only factor—sport-related benefits can also be appealing—such as securing a favourable position, ranking or opponent, or allowing an athlete to win in return for favours.

A global mapping of national legislation on competition manipulation commissioned by the United Nations Office on Drugs and Crime (UNODC) and IOC in 2021<sup>40</sup> identified the following provisions ([figure 7](#)) in relation to adjudicated cases involving competition manipulation:

- Bribery in the public and private sectors
- Embezzlement in the public and private sectors
- Abuse of functions
- Money-laundering

<sup>40</sup> [SPORTS CORRUPTION 2021\\_S8.pdf \(unodc.org\)](#)

Figure 7



Whilst publicly available data is not readily available to articulate levels of competition manipulation in Australian sport, complaints received by Sport Integrity Australia to date do not appear to indicate credible attempts to engage in organised competition manipulation for financial benefit. Nor have we received reports from athletes or participants indicating they have been approached to engage in competition manipulation. The most common topics reported are:

- Issues with decisions made by judges or referees (these allegations generally reference bias or incompetence)
- Allegations of deliberate underperformance
- Inconsistent or unfair rules impacting results.

The manipulation of sporting competitions can be easily achieved and difficult to detect; people are sports' greatest vulnerability, and most important source of defence. While analysis of wagering markets are critical in the detection of potential corruption. The current ecosystem relies on sports, Wagering Service Providers, regulators and law enforcement to play a role, including providing systems and processes to educate athletes and participants on how to identify and report suspicious approaches and activities—and reassurance they will be supported if they do so.

While a diversity of sports are played in Australia, the predominant codes are, in levels of participation and public interest Australian Rules Football, rugby league, rugby union, soccer (or 'football'), cricket, netball, swimming, tennis, motor sports, cycling and the 'races' (thoroughbred, harness and greyhound racing). As detailed in a 2015 report<sup>41</sup>, almost all of the listed sporting codes have been the subject of controversy and most of these have been affected by allegations of corruption.

**Examples:**

- 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.*
- In 2020, Australian betting agencies uncovered patterns in bets being placed, revealing that certain punters were consistently winning in a way that defied statistical averages. New South Wales Police began investigating the activity and identified around \$500,000 allegedly used in the matches. Some of the funds were linked to Australian table tennis champion—Adam Green—who Police allege used “his inside knowledge to gain information about table tennis matches in Ukraine that had a predetermined outcome... In other words, he knew who was going to win the match before he put the bets on.” Sport Integrity Australia worked with New South Wales Police to understand the implications on the domestic sporting landscape and assisted in liaising with the AFP International Network. In January 2021, Green was formally charged by New South Wales Police for using corrupt conduct information to bet on an event and knowingly dealing with proceeds of crime.*

<sup>41</sup> [Corruption in Australian sport | Australian Institute of Criminology \(aic.gov.au\)](https://www.aic.gov.au/corruption-in-australian-sport)

## 1.2 The magnitude of the problem

It is clear that the integrity of sport globally has become a dominating theme in world sport in recent years with successive revelations of systematic competition manipulation, doping, illicit drug use, corruption scandals and other compromises placing at risk public confidence in sports at all levels as detailed in this section of the IA.

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

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) <sup>42</sup> have increased accordingly.

There is a body of evidence that use of performance enhancing drugs is also seen by the public as a serious threat to sport that damages its reputation<sup>43</sup>. This has been seen to have a negative impact on television audiences<sup>44</sup>, on sponsorship<sup>45</sup> and on audience attendance<sup>46</sup>.

Athletes no longer need to rely on specialist support personnel such as doctors and coaches to find and source PIEDS. Globalisation and the internet have enabled athletes to do their own research, to access specialist doping blogs and chat rooms, and to anonymously order the substances that they seek online. This self-initiated doping can be difficult to identify without close monitoring of individual athlete performance, as the fewer people who know about the doping, the more likely it is that the doping will remain secret.

Due to its covert nature, it is impossible to accurately quantify the incidence of doping. However, there is widespread recognition that the statistics for positive doping tests significantly underrepresent the real scale of the problem. This is well demonstrated by the results of retrospective testing of athlete samples from the 2008 Beijing and 2012 London Olympic Games, which identified more than 100 new positive test results that had returned negative results from samples during the Games. In further recognition of this, in 2012 WADA established a working group to consider why the testing programs run by NADOs and international sporting organisations do not seem to be working as effectively as they should, given the anecdotal evidence of doping at much higher levels than the number of positive cases would suggest<sup>47</sup>.

The use of PIEDS is more complex and sophisticated than ever before, doping is much harder to detect, an assertion borne out by the results of several recent reanalysis programs, including those relating to recent Olympic Games<sup>48</sup>. It is generally accepted now that a detection program involving both sample analysis and intelligence-based investigations is required for the enforcement of anti-doping rules, as a foundation for preventive measures, and as a means to pursue non-analytical cases.

### **In short, the dopers remain ahead of the testers and the process of detection has been one of catch up.**

As part of Sport Integrity Australia's Annual Stakeholder survey 2023, respondents were presented with a list of eleven potential sport integrity threats, and asked to indicate which were the main threats to their sport, or to sport in general. No limit was set on how many 'main' threats could be selected, each respondent on average selected 3 threats. [Figure 8](#) shows a wide range of different responses, three threats predominated (bullying, selection processes and intimidation,

<sup>42</sup> [Paralympics in crisis as international and Australian athletes game the system - ABC News](#)

<sup>43</sup> Harry Arne Solberg, [Dag Vidar Hanstad and Thor Atle Thøring 2010. 'Doping in elite sport—do the fans care?: public opinion on the consequences of doping scandals'](#), International Journal of Sports Marketing & Sponsorship.

<sup>44</sup> [Van Reeth, D. 2013. 'TV demand for the Tour de France: The importance of stage characteristics versus outcome uncertainty, patriotism, and doping'](#), International Journal of Sport Finance.

<sup>45</sup> [Buechel, B, Emrich, E & Pohlkamp, S, 2014, 'Nobody's innocent: The role of customers in the doping dilemma'](#), Journal of Sports Economics.

<sup>46</sup> [Cisyk, J & Courty P. 2015. 'Do fans care about compliance to doping regulations in sports? The Impact of PED suspension in baseball'](#), Journal of Sports Economics.

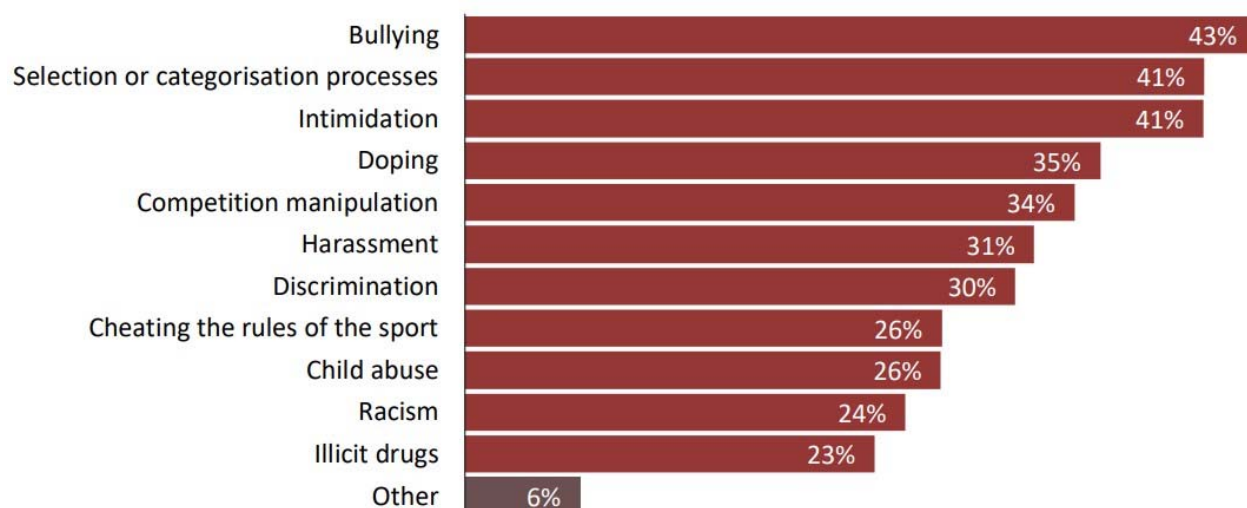
<sup>47</sup> World Anti-Doping Agency, 'Report to WADA Executive Committee on Lack of Effectiveness of Testing program, <<https://www.wada-ama.org/sites/default/files/resources/files/2013-05-12-Lack-of-effectiveness-of-testing-WG-Report-Final.pdf>>.

<sup>48</sup> Grohmann K, Sample re-tests from Sochi Olympics to run to 2022: IOC, 21 February 2017, Reuters <<https://www.reuters.com/article/us-doping-olympics-sochi/sample-re-tests-from-sochi-olympics-to-run-to-2022-ioc-idUSKBN1600UE>>.

each with over 40%), although even the least selected threat, illicit drugs, was seen as a main threat by nearly one quarter of respondents (23%). There was also considerable variation across stakeholder groups:

- **Athletes** were generally more relaxed in their perception of threats (particularly regarding child abuse—seen as a threat by 12% of athletes, compared to 26% of stakeholders generally). However, they were more likely to see doping as a main threat (40%).
- **Support personnel** were more likely than athletes to see both bullying (47%, compared to 34%) and intimidation (46%, compared to 33%) as main threats. Bullying was cited more frequently still by members of national (53%) and non-national (49%) sporting organisations.
- **Doping** saw the greatest variance of opinions—seen as a main threat by 83% of those representing organisations, but only 24% for those representing non-national sporting organisations.

Figure 8: Sport Integrity Australia’s Annual Stakeholder survey 2023 - threats



### 1.3 Who is affected by the problem and the cost of not doing anything.

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. The Wood review noted ‘Australia’s sports integrity environment compares favourably with many other countries. However, judging from current international experience, the potential for serious integrity breaches in this country and for the intervention of organised crime by reason of available opportunities remains real, and is growing. Without the presence of a comprehensive, effective and nationally coordinated response capability, the hard-earned reputation of sport in this country risks being tarnished, along with a potential reduction in participation rates and a diminution in the social, cultural and economic value of Australia’s significant investment in sport.’

Sport plays a significant part in Australia’s way of life and the Australian economy - sport generates \$35-47 billion of economic activity (2-3 % of GDP, equivalent to the agriculture sector)<sup>49</sup>. In addition, each year the Australian Government invests more than \$300 million to support high performance sport and encourage greater participation.

The Australian Secondary Schools Alcohol and Drug Survey shows 2 to 3% of secondary school students have used anabolic steroids (48,000 teenagers). Any increase in the use of PIEDs and cheating in sport directly effects the reputation of Australian sport. This has direct economic impacts with sponsorship, media deals and participation rates as parents look to control what and how their children participate in sport.

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.

<sup>49</sup> Boston Consulting Group’s Intergenerational Review of Australian Sport (2017)

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.

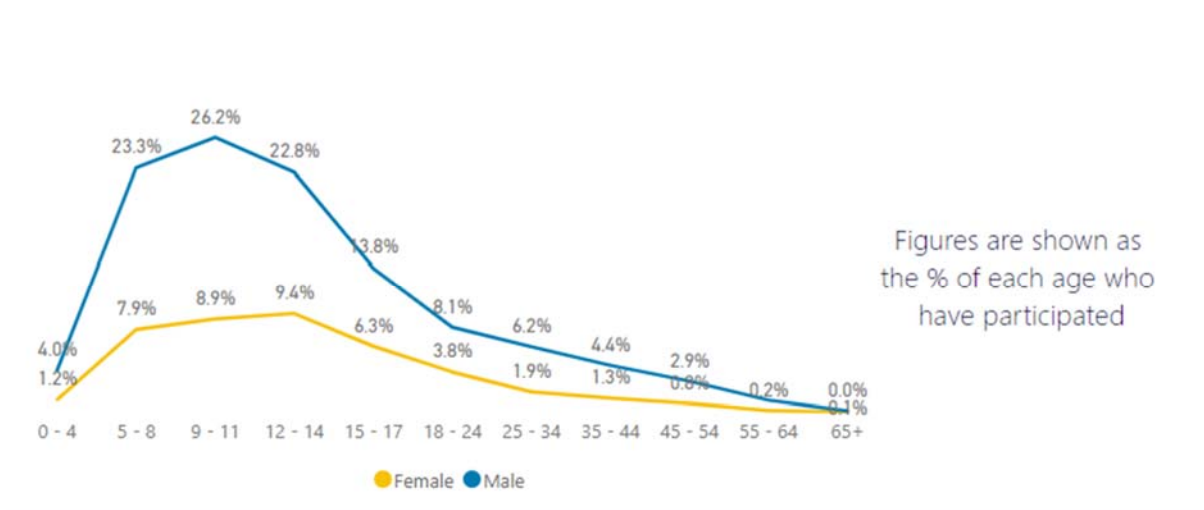
An overwhelming number of Australia's elite athletes are under significant financial pressure, which has flow on impacts on their mental health, their families' financial security and their ability to stay in the sport. Recent research<sup>50</sup> shows there is a lot of support needed to meet financial 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'<sup>51</sup> 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
- 2 in 5 (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 ABC <sup>52</sup> 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% of Australian clubs have seen a membership decrease due to financial burden.' This is evidenced in the graph <sup>53</sup> at [figure 9](#), that shows the rapid dropout rate of participants in football/soccer in Australia.

Figure 9: Football Australia participation by age group



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 Julie Inman Grant eSafety Commissioner.

People of all ages can be vulnerable in virtual environments to manipulation, grooming, and coercion<sup>54</sup>. 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."

<sup>50</sup> ASF: Running on Empty report. August 2023

<sup>51</sup> [Running on Empty - Australian Elite Athlete Research Findings \(August 2023\) \(sportsfoundation.org.au\)](https://www.sportsfoundation.org.au/research/running-on-empty)

<sup>52</sup> [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](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)

<sup>53</sup> AUSPLAY\_football/soccer report

<sup>54</sup> Kavanagh, Litchfield & Osbourne (2019)

**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.

80.3% of people aged 15 years and over participated in organised sport or physical activity once per week<sup>55</sup>. 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.

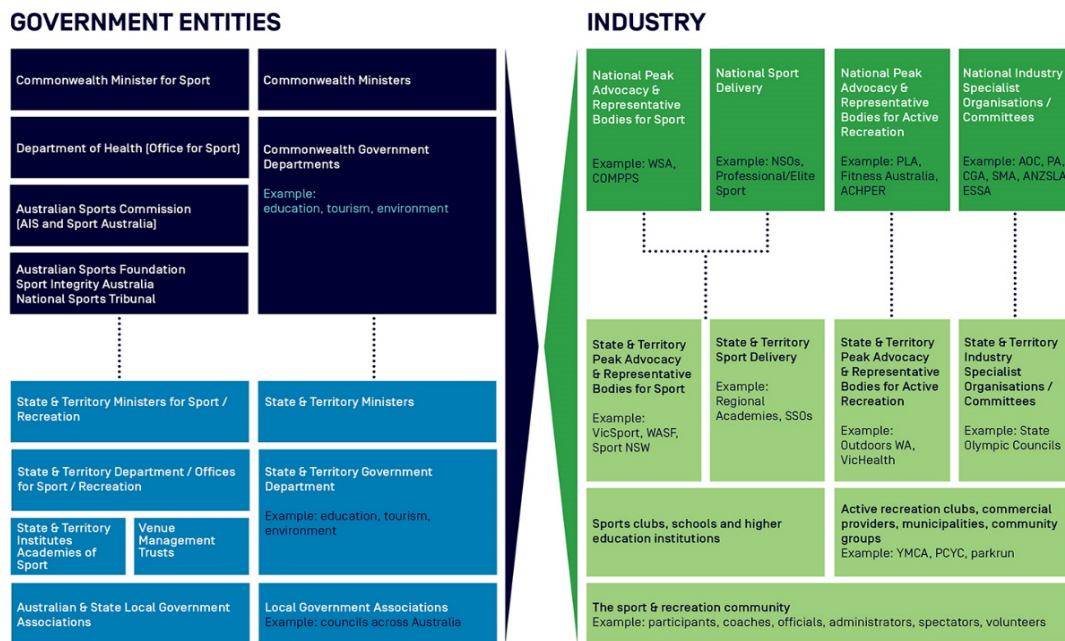
### The Australian sporting ecosystem

This section outlines how sport and government interact 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. 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 annually<sup>56</sup> 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 through [Figure 10](#).

Figure 10: The Sport Ecosystem<sup>57</sup>



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

<sup>55</sup> Department of Health and Aged Care Annual Report 2021-22

<sup>56</sup> Clearinghouse for sport\_Australian sport policy

<sup>57</sup> Clearinghouse for sport



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

Sport across all sizes and levels have recently articulated <sup>58</sup> 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, the NIF, to policy writing, procedure implementation, education, complaint management.

Table 1: Sports Top 4 Challenges

Club size	Top 4 Challenges
<b>Small</b> (1-199 members)	Not enough volunteers
	Obtaining funding
	Administration load
	Increasing participation
<b>Medium</b> (200-499 members)	Not enough volunteers
	Administration load
	Obtaining funding
	Grounds/facilities/equipment
<b>Large</b> (500-999 members)	Administration load
	Grounds/facilities/equipment
	Not enough volunteers
	Increasing operating and utility costs
<b>Very large</b> (1000+ members)	Administration load
	Grounds/facilities/equipment
	Not enough volunteers
	Obtaining funding

### 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 some 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 presented options will impact nearly all of NSO/NSODs with approximately 95% of the Sport Integrity Australia’s current activities relate to NSO/NSODs, their athletes and sporting participants across all levels of sport.

There are a total of 97 NSO/NSODs. A full list is provided at [Attachment C](#). Of the 97, there are 7 ‘major’ NSOs that are referred to as the Coalition of Major Professional and Participation Sports (COMPPS), refer [Figure 11](#). The COMPPS consists of the national organisations that are the custodians of Australia’s most prominent professional sports: Tennis, Football, Cricket, Rugby Union, Netball, NRL 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.

<sup>58</sup> ASF: Clubs under pressure report (May 2023)

Figure 11: COMPPS sports



### **National Sports Collective:**

The National Sports Collective is an informal collaboration of some 35 NSOs/NSOD that share information and meet to discuss common issues and opportunities. The Collective currently includes 11 Olympic and Paralympic sports and a further 24 smaller Olympic and Commonwealth Games sports and NSODs. The Collective is currently planning to formalise their arrangement by potentially setting up a legal entity and potentially look for additional sports (outside of COMPPS) to become members.

### **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/NSOD) 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 IA does not articulate or list them.

### **Flow on impacts**

Each year, some 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 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.

The recent decision to provide ongoing funding to the Safety in Sport program will provide capabilities and services to enable Sport Integrity Australia to proactively address 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: 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.

### **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 - 'the World Cup changed the conversation'<sup>59</sup>.

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 was not 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 free to air television 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 is 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 hotels, 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.

## **1.4 What are the great benefits that sport delivers that are at risk?**

A sporting environment built on integrity and fairness will attract and retain participants, with flow on benefits to the wider systems of health, economics, social and culture.

The 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 Well2032+' ethos, it is critical we start the conversation and education at the grassroots level because today's five-year-old could be our 2032 Olympian.

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 event.

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<sup>59</sup> Dr. Catherine Ordway, University of Canberra

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.’

Figure 12: Mental Health

### 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:



## 1.5 Current government capabilities, legislation, measures to address the problem – are they working?

The government has the capabilities, legislation and measures available to address and manage the identified problem. These measures are currently being used and the effectiveness of this is published in the Annual Performance Statement of Sport Integrity Australia’s Annual report. This is analysed in more detail at the [current measures](#) section of the IA.

The 4 funding options analysed will allow Sport Integrity Australia to continue, at scalable levels, to manage the problem as the dedicated agency of the government that exists to prevent and address threats to sports integrity and to coordinate a national approach to matters relating to sports integrity in Australia, with a view to:

- achieving fair and honest sporting performances and outcomes
- promoting positive conduct by athletes, administrators, officials, supporters and other stakeholders, on and off the sporting arena
- achieving a safe, fair and inclusive sporting environment at all levels
- enhancing the reputation and standing of sporting contests and of sport overall.

Sport Integrity Australia coordinates elements of the national sports integrity threat response including prevention, monitoring and detection, investigation and enforcement. It is a single point of contact for athletes, sporting organisations, law enforcement bodies and other stakeholders for matters relating to sports integrity. Responsibilities include being Australia’s NADO, providing a comprehensive anti-doping program for the Australian sport community and administering the NIF which is a set of policies all members of sports need to follow when it comes to their behaviour and conduct in sport.

The areas of focus for Sport Integrity Australia to ensure the protection and health of athletes and the integrity of Australian sport, are:

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

The current domestic legislation and international conventions that affect powers to achieve this are detailed at [Attachment A](#).

We continue to develop our partnerships to build a contemporary view of evolving issues in sport, such as concussion, para classification (intentional misrepresentation) and online safety, to provide advice and referrals to experts where required and shape policy where needed.

## Current measures to address the problem – are they working?

The current measure to address the problem is simply framed as – the existence of Sport Integrity Australia and the programs, services and activities that it delivers.

It is assessed that this is a very effective measure and the [options presented](#) seek to continue this measure and to either maintain, enhance or provide a major uplift in capability and capacity.

The above broad assessment is quantified within this heading and considered against the elements of the identified policy problem - *'threats to sport have become more sophisticated, and ever evolving, and without integrity underpinning participation, the great benefits that sport delivers to the Australian community will be lost.'*

[Table 2](#) summaries the assessment of Sport Integrity Australia's effectiveness as the existing measure to address the policy problem. The information within this table has been extracted from [Sport Integrity Australia's 2022-23 Annual Report](#).

Table 2

Measure	Target and methodology	Result*	
		2022-23	2021-22
Sport Integrity Australia gathers, assesses and shares information with stakeholders	<ul style="list-style-type: none"> <li>Analysis (comprises identifying relevant qualitative and quantitative data available, along with case studies, from which performance stories demonstrate the agency's achievement against the performance measure) of Sport Integrity Australia's contribution to stakeholders' capability to address sports integrity threats through timely and fit for purpose information sharing</li> <li>External feedback from stakeholders</li> </ul>	Met	Met
Sport Integrity Australia leverages productive partnerships and contributes to fora, committees and projects	<ul style="list-style-type: none"> <li>Committees are permanent panels or groups established through governance to have recognised members and authority. Includes WADA standing committees (e.g. Finance and Administration; Health, Medical and Research; Education)</li> <li>'Productive' is demonstrated through impact</li> <li>Analysis of Sport Integrity Australia's partnerships</li> <li>Analysis of Sport Integrity Australia's contribution to fora, committees and projects</li> <li>External feedback from stakeholders</li> </ul>	Met	Met
Sport Integrity Australia promotes positive practices across the sporting community	<ul style="list-style-type: none"> <li>Analysis of sharing Sport Integrity Australia's resources* with stakeholders *Resources means all information mediums including website, governance templates, social media tiles, flyers, posters, education plans, facts sheets, Sport Integrity app and 'On Side' podcast</li> <li>Analysis of Sport Integrity Australia's initiatives to promote or influence positive practices</li> <li>External feedback from stakeholders</li> </ul>	Met	Met
Sport Integrity Australia identifies and addresses sports integrity threats	<ul style="list-style-type: none"> <li>Analysis of Sporting Administration Bodies' compliance with Sport Integrity Australia administered integrity policies.</li> <li>Analysis of Sport Integrity Australia's activities to identify and address sports integrity threats.</li> <li>External feedback from partners</li> </ul>	Met	Met

\*Result key:

*Met* - All elements of the performance measure were achieved. Where applicable, all stakeholder survey results  $\geq 50\%$

*Not met* - Some elements of the performance measure were not achieved. Where applicable, some stakeholder survey results  $\leq 50\%$

## Is the current measure mitigating the threat of doping ?

Sport Integrity Australia delivers an innovative and informed testing program for Australian sport. In January 2023, we implemented paperless anti-doping and a new testing method known as dried blood spot testing. We continue to work with domestic and international partners to enhance processes to ensure a trusted and effective anti-doping platform for Australia and the region. We play a prominent role in implementing the World Anti-Doping Code in Australia, and at all times, comply with our obligations under the Code and its International Standards, and our legislative requirements.

In collaboration with our partners, we take a leading role through activities and coordination efforts to address threats to sports integrity. These are 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
- disruption – to cause disorder to the normal continuance of something, for example, through investigation of sports integrity complaints
- detection – to discover the existence of something, for example, through positive doping tests.

We worked in partnership with NSO/NSODs to mitigate anti-doping and integrity threats to provide a safe, fair and inclusive environment for participants at all levels of sport. As Australia's NADO, we conducted an annual audit of NSOs/NSODs to ensure their compliance with the 2021 World Anti-Doping Code including:

- accessibility to the Australian National Anti-Doping Policy
- the conduct of education programs
- occurrence of violations.

We provided written advice to NSO/NSODs to redress any non-compliance issues and monitored the implementation of these.

Our stakeholders are positive about the contribution our education and information services make towards reducing the risk of accidental breaches of the 2021 World Anti-Doping Code, competition manipulation and deliberate doping. Sixty-five of NSO/NSOD respondents to our annual stakeholder survey said we were effective in helping them prevent sports integrity threats in their sport through education and information sharing. Specifically, over 90% of respondents agree our education and information services reduced the risk of an accidental breach of anti-doping regulations and increased their awareness of the effects of illicit drugs in sport. Of the athlete and support personnel respondents to the survey, 76% said their main reason for reporting behaviour (or conduct) would be to protect the integrity of the sport.

Over the past 18 months, under our National Strategy for Information Sharing (NSIS), we have developed Memoranda of Understanding (MOUs) with Australian Commonwealth and state and territory law enforcement agencies. The NSIS was an initiative identified by attendees at our Threats to Sport Integrity Conference in 2021. The MOUs position us as a central information hub for matters relating to sports integrity.

This NSIS identified key partners and engaged with their unique information sharing environments to enable appropriate information sharing mechanisms. This ensures we are equipped to facilitate the collection, assessment and dissemination of information across law enforcement agencies to address the continuum of integrity threats against sport.

The NSIS has strengthened relationships by communicating how we will assist to coordinate, address and strengthen responses to sports integrity matters in a timely and effective manner. This will range from routinely sharing emerging integrity threats with sporting organisations to working with law enforcement agencies on cases involving potential criminal behaviour.

The MOUs allow for more flexible, mobile and agile sharing of information to make informed decisions. A suite of MOUs with law enforcement agencies has never been achieved by a NADO before.

Figures 13 and 14 outline Sport Integrity Australia activities, external statistics and general commentary to support the proposition that the current measure is mitigating the anti-doping threat.

Figure 13

# Keeping sport clean

## Alarming prevalence of performance enhancing drugs in Australian society

- Wastewater analysis by the University of Queensland (2023) found Performance and Image Enhancing Drugs (PIED) use in 96% of the populations tested.
- SARMs use was found to be widespread across the Australian community – turning up in virtually every population tested.
- According to the Australian National Drug Strategy Household Survey (2019), between 2001 and 2019 non-medical anabolic steroid use has almost tripled in this time.
- This reflects an increasing focus on body image by young men and is supported by the 2020 survey of a Melbourne school by Yager and McLean which found **50% of boys aged 14–16 are using protein powder, 62% planned to use it, 8% used creatine, and 4% used steroids.**

## Anti-doping matters

- **364** doping matters received including scientific reports, notifications from external partners, internal reports, field incidents, media and open source information.
- There were **115 tip offs** (information provided by the public). All tipoffs received inform our doping, testing and education programs.
- **16 Anti-Doping Rule Violation (ADRV) cases** progressed to investigations.
  - Over **50%** of these cases involved the presence of **S1 anabolic agents** including Selective Androgen Receptor Modulators.

**115**  
tip offs

*"Individuals develop an unhealthy obsession with muscle growth and definition ... Most anabolic agent consumers are males between 20–24 years of age who misuse these substances to build muscle for aesthetic or performance reasons."*

Dr Laura Lalleneq  
Sport Integrity Australia's Medical Advisor.

## PERCENTAGE OF TESTS OUT-OF-COMPETITION versus IN-COMPETITION



## NUMBER OF ACTIVE ANTI-DOPING SANCTIONS

BY SPORT AND SUBSTANCE AS OF 3 JULY 2023

**4 X WEIGHTLIFTING**—DROSTANOLONE, TESTOSTERONE, LGD-4033, RAD-140, CLENBUTEROL, FUROSEMIDE, OSTARINE

**4 X POWERLIFTING**—19-NORSTERIODS, OSTARINE, DHCMT, NANDROLONE, DHEA

**3 X RUGBY LEAGUE**—TESTOSTERONE, LGD-4033, IBUTAMOREN

**3 X BASEBALL**—1,4-DIMETHYLPENTYLAMINE, DEXTROAMFETAMINE, COCAINE

**2 X RUGBY UNION**—LGD-4033

**2 X FOOTBALL**—LGD-4033

**1 X MOTORCYCLING**—LGD-4033, 19-NORSTERIODS, IGF-1, CJC-1295, CLENBUTEROL, TESTOSTERONE, GROWTH HORMONE, AMPHETAMINE

**1 X CYCLING**—TESTOSTERONE, ANDROSTERONE, CLENBUTEROL, ETIOCHOLANDOLONE, CLOSTEBOL, OXANDROLONE, STANNOZOLID, LETROZOLE

**1 X BASKETBALL**—HIGENAMINE, GW-1516, METHYLHEXANEAMINE

\* Numbers include sanctions from previous years

## Anti-Doping testing

**2,345**

testing missions

**3,590**

different athletes tested

**4,659**

doping tests resulted

in **26** adverse analytical findings

Highest number of tests for one athlete = **9**

Youngest age tested = **14**

Eldest age tested = **61**

Average age tested = **26**

**116 different disciplines tested**

e.g. discus and long distance running are two disciplines of athletics

*"Anabolic steroid use goes beyond anti-doping and could well pose a significant health risk to consumers."*

Dr Laura Lalleneq  
Sport Integrity Australia's  
Medical Advisor

## Education is key!

Our Education program is designed to protect athletes, prevent doping and maintain the integrity of Australian sport.

Online course completions:

**24,428**

Anti-Doping Fundamentals

**4,741**

Clean Sport 101

**3,535**

Decision Making in Sport

**2,295**

Introduction to Illicit Drugs in Sport

Figure 14

## Anabolic agents continue to be the greatest threat to clean sport

- **17 different prohibited substances** were detected in athletes' samples.
- Testing detected higher rates of anabolic agents, including **Selective Androgen Receptor Modulators (SARMs)**.
- The age of athletes caught doping ranged from 21 to 44 years.
- Sport Integrity Australia recorded **26 adverse analytical findings\*** from **4,659 tests**, a ratio of 0.55%. In 2021, the World Anti-Doping Agency reported the global ratio was 0.65%.  
\*This number includes Therapeutic Use Exemptions which allow an athlete to use, for therapeutic purposes only, an otherwise prohibited substance or method of administering a substance.
- There was a higher rate of doping in male athletes.

### Raising awareness of the dangers of taking these substances

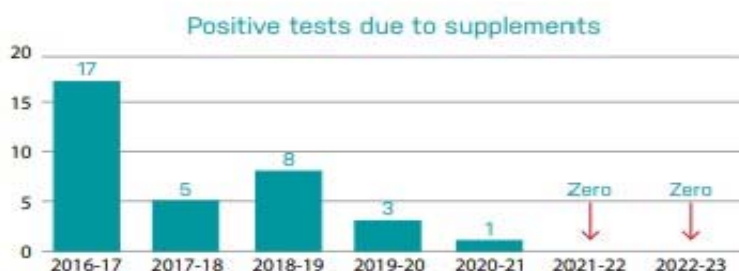
More than **140 education sessions** were delivered to **over 5,400 people**  
**82,180** online education courses completed  
 The **2023 Annual Update** online course was completed by **25,178 people**

## Rise in athletes experimenting with SARMs

- SARMs are a group of **experimental medicines** claiming to build muscle mass and bone density without the side effects of steroids.
- They have **not been approved for human consumption**.
- **SARMs are illegal in Australia** without a valid prescription, licence or authority to possess.
- Buying SARMs online could result in hefty fines and/or jail time.
- A 2021 Australian study by Chakrabarty et al. found that 70% of SARM and related PIED products contained incorrect dosages to what was advertised on the label.
  - It also found more than **80% of SARM and related PIED products** were contaminated with one or more other SARMs and related substances.

## Eliminating supplement positives

- Supplements were one of the biggest risks, with 17 athletes inadvertently testing positive due to a supplement in 2016-17.
- **For the past two years, no athlete has inadvertently tested positive because of supplement** due to a combined **education, communication and regulatory response** directed at athletes, coaches, parents and medical support staff.
- Athletes, through our **Athlete Advisory Group**, helped inform changes to supplement messaging.
- The **Sport Integrity app** was instrumental in this success, enabling athletes to check before use and to find low-risk 'batch-tested' supplements and medications.



**Sport Integrity app**  
 Downloaded **18,791** times in 2022-23  
 Averaged **4,318** supplement checks per month  
**78,673** total downloads since it was created

"When I purchased a supplement from a local store in Australia and checked the ingredients... I thought I was doing everything right... I was so wrong – some banned ingredients have various names – I found this out the hard way and paid a huge price."

**Cassie Fien**  
 Former sanctioned athlete,  
 Athlete Advisory Group member

Currently there are 22 individuals sanctioned as publicly listed on the SIA [Website](#).

### Is the current measure mitigating the threat of broader integrity issues?

In 2021, the NIF was introduced and drew a line at behaviours that have no place in sport. For the first time we had a consistent approach across all sport, so regardless of where you played sport, the rules were the same. Sport also recognised the need for a NIF, with many in the process of adopting the revised NIF that outlines prohibited behaviour and responses. The revised NIF equips sports with the tools and resources to conduct investigations into allegations relating to matters outside of our remit. This is building the capability within sports and has set the foundations for Australia to address integrity in sport.



Over the past 2 years, we have partnered with sports to help develop, refine and implement the NIF and, in July 2022, we established the NIM Network so sports could support, collaborate and share knowledge and expertise. Through the NIM, we identified challenges for sports in implementing the NIF and worked in collaboration with them to refine the NIF and ensure it works more effectively for all involved.

In January 2023, the Safety in Sport Division was established to provide athletes with a 'safe place' to tell their story. The Division includes a 1800 Safe Sport Hotline which provides an avenue for athletes to be listened to and heard and a path to heal from non-recent abuse. It also includes an anonymous reporting capability that covers wider racial and cultural issues in sport for people who feel as though they have been discriminated against in their sport.

In May 2023, we co-hosted the third annual Threats to Sport Integrity Conference with Queensland Police. The conference featured delegates from 28 agencies representing law enforcement, child protection, regulatory and sport sectors. More than 70% of attendees said we collected information that may be useful for their organisation and that they would use this information for investigations and informing education needs, trends, to locate offenders, to disrupt and investigate supply chains and target organised crime. This outcome further demonstrates our efforts to work collaboratively with partner agencies.

We provide general policy assistance to NSO/NSODs in these areas and developed resources for sports to assist in managing these matters. We developed a complaints categorisation model and investigations toolkit with templates and guidance to assist sports when conducting investigations into allegations relating to one of these matters.

An important element of protecting sport from competition manipulation is the coordination of information with relevant law enforcement partners. Often this means international partners, and the International Criminal Police Organisation (INTERPOL) is the key partner for 195 police forces around the world to facilitate this information exchange.

We have strong and enduring links with many international bodies and INTERPOL has been a regular collaboration partner for us to receive information from, and provide information to, when we are assisting investigations. During discussions in mid-2022, INTERPOL invited our Chief Executive Officer, David Sharpe, to speak at the annual General Assembly on the work that has been done to support law enforcement agencies in sport integrity issues and related serious organised and financial crimes. This led to an invitation to provide a seconded officer to INTERPOL's Financial Crime and Anti-Corruption Centre (IFCACC) to support growing the capability of the global law enforcement response and profile of criminal infiltration of sport.

### **Broader Sport Integrity Australia performance**

During 2022–23, we continued to deliver on our Portfolio Budget Statement program objective of promoting community confidence in sport by preventing and addressing threats to sports integrity and the health and welfare of those who participate in sport through the coordination of a national approach to matters relating to sport integrity in Australia.

Our annual stakeholder survey results showed improvement across most aspects of our performance, with 89% of respondents indicating we are successfully delivering on our program objective. Our stakeholders continue to show a high level of awareness of who we are and what we do, and 97% of respondents confirm we had an overall positive impact on the sporting community in 2022–23.

We continued to deliver on our purpose with 81% or more responding positively to questions relating to our purpose and functions, including successfully contributing to the achievement of:

- fair and honest sporting performances and outcomes
- promoting positive conduct on and off the sporting arena
- protecting the integrity of sport.

Key deliverables linked to our performance in 2022–23 include:

- launch of the NIM Network
- successfully delivery our annual Threats to Sport Integrity Conference and Global Education Conference
- development of Memoranda of Understanding (MOUs) with Australian Commonwealth and state and territory law enforcement agencies
- engagement with an additional 36,473 participants in our online and face-to-face education courses and Play by the Rules courses combined compared to 2021–22.

Our 2022–23 stakeholder survey was conducted by ORIMA Research. The survey recorded 2,255 responses in total, compared to 683 complete responses in 2021–22. We invited all stakeholders that we had centrally stored contact details for and had interacted with us over the past 12 months to complete the survey. NSO/NSODs were invited to share a generic link with their stakeholders through their own networks. Responses were received from athletes, support personnel, sporting organisation representatives and non-sporting organisation representatives, among others.

The 2022–23 survey methodology allowed respondents to opt out of answering individual questions; this was not an option last year. As such, each question extracted for inclusion in the Annual Performance Statement produced varying response numbers in 2022–23, ranging from 1,692 to 1,777 responses.

Summary of responses is detailed at [table 3](#).

Table 3

## Survey responses to our purpose and functions

Annual stakeholder survey response		
2023	2022	
97%	96%	of respondents said the agency had an overall positive impact on Australia's sporting community, with 63% of those rating that impact high or very high
84%	79%	of respondents said the agency is successfully contributing towards achieving fair and honest sporting performances and outcomes
83%	79%	of respondents said the agency is successfully contributing towards promoting positive conduct by athletes, administrators, officials, supporters and other stakeholders, on and off the sporting arena
81%	78%	of respondents said the agency is successfully contributing towards achieving a safe, fair and inclusive sporting environment at all levels
81%	79%	of respondents said the agency is successfully contributing towards enhancing the reputation and standing of sporting contests and of sport overall
93%	91%	of respondents trust in the agency as a credible source of information on the integrity of sport
89%	89%	of respondents have confidence in the agency's ability to positively contribute towards protecting the integrity of sport in Australia
87%	80%	of respondents said the agency is successfully coordinating a national approach to protecting the integrity of sport and the health and welfare of those who participate in sport in Australia

We have continued to develop and build our information sharing partnerships with both government and industry stakeholders. We used information obtained through our operations, research and partnerships to publish 4 threat assessments and 3 analytical reports. These publications included specific sport-based assessments of the key threats to sports integrity, assessments of emerging threats to the broader sporting environment, trends, particularly regarding threats in the anti-doping space, and the inaugural Threats to Sports Integrity in Australia Analytical Report for NSO/NSODs.

Our effectiveness is contingent on impactful partnerships. We play a leading role in capacity building, collaboration and consultation, both nationally and internationally, via formal and informal engagements, fora, committees, working groups and projects. We have continued the international anti-doping effort by building on cooperation between governments and the international sporting movement in supporting the activities of WADA.

In 2022–23, we delivered education on a wide range of sport integrity threats to a diverse range of sport participants to promote or influence positive practices. Through our learning management system, 82,180 online education courses were completed in 2022–23, compared to 59,382 in 2021–22. These courses covered anti-doping, child safeguarding, the NIF, decision making in sport, cyber safety and security, competition manipulation and more.

We also facilitated 143 face-to-face education sessions with 5,453 participants in attendance, an increase of 2,351 from 2021–22. Results of our face-to-face feedback surveys showed 99.1% of respondents agreed they are better informed of the anti-doping rules after completing the course.

In addition to our education courses, 90 print and digital education resources were created and shared throughout 2022–23 in the form of fact sheets, posters, flyers, booklets, videos, podcasts and so on. We also recorded 930,707 website views, up from 643,705 in 2021–22.

Our Play by the Rules education courses recorded 43,242 completions, up from 31,918 in 2021–22.

Figure 15 outlines Sport Integrity Australia activities, external statistics and general commentary to support the proposition that the current measure is mitigating corruption in sport.

Figure 15



## 1.6 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:

- 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 closed 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.

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.

**It is assessed** that current capabilities as detailed under Status Quo in [Section 2](#) are not sufficient to address the problem and that additional government action and investment are required. An uplift in capabilities is critical to ensure the actions, quality and timeliness of Australia’s anti-doping and integrity programs are fit for purpose. This is explored in detail in the following Section.

## 2 What are the objectives, why is government intervention needed to achieve them, and how will success be measured?

**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’**

Section 2 is framed around the SMART objectives to help clarify the need for government intervention and how these objectives will be measured. The SMART objectives are Specific, Measurable, Accountable, Realistic and Timely.

How they frame this section, and the broader IA are detailed in the SMART Key at table 4.

Table 4:

SMART Key		
SMART Element	Description	Link to relevant section or reference in the IA
Specific	<ul style="list-style-type: none"> <li>How do you want to accomplish this objective?</li> <li>Why is this goal important?</li> <li>Who is involved?</li> </ul>	<a href="#">The problem</a> and <a href="#">who is affected by the problem</a> <a href="#">What are the great benefits that sport delivers</a> <a href="#">Why is it necessary to have a regulator</a> <a href="#">The cost of not doing anything</a>
Measurable	<ul style="list-style-type: none"> <li>What does success look like?</li> <li>How will you measure success?</li> <li>How will track success?</li> </ul>	<a href="#">What are the objectives</a> <a href="#">Performance measures</a> <a href="#">Implementation plans</a> <a href="#">Evaluation plan</a>
Accountable	<ul style="list-style-type: none"> <li>How will you communicate the goal?</li> <li>How will you stay on track?</li> </ul>	<a href="#">Implementation plans</a> <a href="#">Sport Integrity Australia's - governance</a> <a href="#">Performance measures</a>
Realistic	<ul style="list-style-type: none"> <li>Are the resources available to achieve this goal?</li> <li>What limitations are these to achieving these?</li> </ul>	<a href="#">Current funding arrangements</a> <a href="#">Implementation plans</a> <a href="#">Threats and risks</a> <a href="#">Barriers to success</a>
Timely	<ul style="list-style-type: none"> <li>What are the timeframes for achieving this goal?</li> </ul>	<a href="#">Implementation Plans</a> <a href="#">Performance Measures</a>

In the Government’s response to the Wood Review – *Safeguarding the Integrity of Sport* – it noted ‘there is a strong argument for Government action - a cohesive, well-resourced national level capability is required now more than ever if Australia is 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. This is also expressed in the National Sports Plan, with ‘Safeguarding the Integrity of Sport’ one of four key pillars.

The Wood Review presented 52 recommendations for consideration with the Government agreeing with 22 of the recommendations, agreeing in-principle with 12 and a further 15 were agreed in-principle for further consideration. Two recommendations were agreed in part, and one was noted.

Each of the 4 options presented seek to continue the agreed reason for government to intervene, including demonstration that government has the capacity to intervene successfully.

Recommendations under the two themes identified are directly relevant to the options proposed:

- A National Sports Integrity Commission (Sport Integrity Australia)
- Enhancing Australia's anti-doping capability.

These recommendations are detailed in [table 5](#) and clearly set action for Government and in turn Sport Integrity Australia. For the ease of reading, full text some recommendations has not been inserted in all instances, rather just the headline recommendation. Full text and context is located within the Government's publicly available response at [Safeguarding the Integrity of Sport – the Government Response to the Wood Review](#).

Table 5: Summary of (relevant) Wood Review recommendations

Theme	Wood Review - recommendation	Government Position	Safeguarding the Integrity of Sport - Government response
<b>A National Sports Integrity Commission (Sport Integrity Australia)</b>	38 - That the Australian Government establish a NSIC to cohesively draw together and develop existing sports integrity capabilities, knowledge and expertise, and to nationally coordinate all elements of the sports integrity threat response including prevention, monitoring and detection, investigation and enforcement.	Agreed	The Government agrees to establish a NSIC, Sport Integrity Australia, to address the numerous vulnerabilities in the current national sports integrity framework as identified throughout the Wood Review.
	40 - That the NSIC have three primary areas of focus: <ul style="list-style-type: none"> <li>• regulation</li> <li>• monitoring, intelligence and investigations</li> <li>• policy and program delivery (including education, outreach and development).</li> </ul>	Agreed	The Government agrees in principle with the role and responsibility of Sport Integrity Australia and notes the complexity of establishing the entity.
	47 - That a whistle-blower scheme encompassing all sports integrity issues, and a related source protection framework, be administered by the NSIC	Agreed	The Government agrees that an independent whistle-blower service administered by Sport Integrity Australia is necessary for the confidential reporting of integrity threats by athletes and support personnel. Priority will be given to establishing Sport Integrity Australia initially with existing ASADA and NISU capability, before then considering how a whistle-blower scheme may integrate into an expanded future NSIC.
	48 - That the NSIC work with major professional sports regarding illicit drugs policies with a view to seeking access to results of sample analysis for the purposes of integrating with intelligence and analysis capabilities.	Agreed in principle – for further consideration	Sport Integrity Australia will work with sporting bodies and player representation groups to achieve the overall intent of this recommendation to allow an informed and accurate understanding of the integrity threat environment and for protective and preventive measures to be developed.
<b>Enhancing Australia's anti-doping capability</b>	17 - That the Australian Sports Anti-Doping Authority (ASADA) be retained as Australia's NADO and that the current requirement for all NSO/NSODs (including sports with competitions only up to the national level) to have anti-doping rules and policies that comply with the World Anti-Doping Code also be retained.	Agreed in part	While the Government agrees that all NSOs should continue to have compliant anti-doping policies, it is of the view that the current functions of ASADA should be incorporated into a NSIC to provide for a single, effective national body responsible for all sports integrity matters and providing a single point of consultation and outreach for all stakeholders on sports integrity matters. In achieving this outcome, all relevant requirements of the World Anti-Doping Code and UNESCO International Convention against Doping in Sport will continue to be observed.
	18 - That ASADA's regulatory role and engagement with sports in relation to the audit and enforcement of sport's compliance with anti-doping rules and approved policies be enhanced by	Agreed	The Government agrees to enhance anti-doping engagement with sports and compliance by establishing regulatory compliance powers exercisable by the NSIC.

	establishing regulatory compliance powers exercisable by the proposed NSIC in collaboration with (and at the request of) the ASADA CEO.		
	19 - That the introduction of regulatory amendments to the Australian Sports Anti-Doping Authority Act 2006 (Cth) (ASADA Act) be considered	Agreed	The Government supports relevant changes being made to anti-doping statutes and has commenced the process required for such changes to take effect, noting the Government Response to Recommendation 17. In achieving this outcome, all relevant requirements of the World Anti-Doping Code and UNESCO International Convention against Doping in Sport will continue to be observed.
	20 - That ASADA and the sports sector should increase their respective investments in anti-doping education, collaborating to deliver more effective education and training packages with greater reach below national-level athletes	Agreed	The Government strongly supports increased focus on anti-doping education and, in 2018-19, provided additional funding to ASADA to support this work.
	21 - That the Australian Government ensure that ASADA is adequately resourced and financially sustainable, enhancing its capacity to engage with sports and be an effective and responsive regulator and NADO.	Agreed	The Government acknowledges the importance of adequately resourcing Australia's anti-doping capability.
	23 - That ASADA's investigative capability be enhanced	Agreed	The Government agrees that intelligence and investigation functions play a central role in the deterrence and detection of sophisticated doping methods and that anti-doping investigative capability be enhanced via these specific recommendations.
	46 - That the NSIC work closely with the ACIC and that the ACIC be resourced to maintain a standing, advanced sports criminal intelligence capability to: enable enhanced analysis and exploitation of NSIC data and intelligence products; support the NSIC through advanced intelligence capabilities; and proactively develop intelligence on serious organised criminality linked to sport but outside the remit of the NSIC	Agreed	The Government agrees Sport Integrity Australia will work closely with the ACIC and for the ACIC be resourced to maintain a standing advanced sports criminal intelligence capability.
	49 - That consideration be given to the NSIC becoming responsible for centrally coordinating sports integrity policy functions previously executed by a number of different organisations	Agreed	The Government agrees and will continue to consider the most effective way to transition the functions of affected Commonwealth agencies into a single entity
	51 - That the NSIC provide direct assistance to small and emerging sports in Australia that lack capacity to deal with integrity issues.	Agreed	The Government agrees and will continue to consider the most effective way to transition the functions of affected Commonwealth agencies into a single entity
	52. -That a single, easily identifiable education and outreach platform be established within the NSIC, dedicated to developing and coordinating education, training and outreach resources and programs	Agreed	The Government agrees and will continue to consider the most effective way to transition the functions of affected Commonwealth agencies into a single entity

As detailed earlier in the IA, Sports and their participants continue to be challenged by a range of growing safety and integrity threats along with persistent societal challenges. The decade leading up to the 2032 Olympic and Paralympic Games to be held in Brisbane, Australia, represents an opportunity to prioritise effort across Government and sports to make sport and its participants more aware and resilient to current and emerging threats, so Australia is seen as a country that plays and wins well.

The May 2023 ASF 'Clubs under Pressure'<sup>60</sup> 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, which identifies a clear opportunity for government to act through both 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 2023 government announcement of the 'Play our Way' program<sup>61</sup> has clearly acted in response to priority 1 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 either of the options proposed will support 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?

***Establishing Sport Integrity Australia, absent of any additional functions, will reduce the regulatory burden on sport, athletes and others who are currently required to interact with multiple agencies on matters across the sports integrity spectrum. The ongoing support of the sports sector will be required for the full expansion of Sport Integrity Australia to cover all intended integrity outcomes<sup>62</sup>.***

There are so many elements to sports integrity that no one agency, no one country, can manage these issues alone. Our partnerships with sport, law enforcement, intelligence, safeguarding and regulatory agencies are crucial to protecting our athletes and the integrity of competitions at home and abroad. Expansion of domestic, international and non-traditional partnerships are critical. Partnerships help inform our strategies, including how best to support athletes, coaches and support personnel in making the right decisions ethically and how best to deliver fit-for-purpose education and prevention programs<sup>63</sup>.

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.

As detailed throughout the IA, funding pressure when considered against competing priorities, expertise and critical mass sees Industry, in the broad, unable to 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.

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.

As threats to the integrity of sport continue to evolve, Australia's vulnerability to further and future compromise is exacerbated by failures to comprehensively implement nationally consistent legislative measures and other protections

<sup>60</sup> [ASF Research Confirms Community Clubs are Under Pressure | Australian Sports Foundation](#)

<sup>61</sup> [Securing a sporting legacy for women and girls | Health Portfolio Ministers | Australian Government Department of Health and Aged Care](#)

<sup>62</sup> Safeguarding the Integrity of Sport – the Government Response to the Wood Review

<sup>63</sup> SIA CEO David Sharpe APM OAM\_SIA Corporate Plan 2023-27



and develop centralised intelligence and law-enforcement capabilities to connect Commonwealth and state and territory agencies, enabling agile and decisive responses.

These current and future foreseeable sports integrity threats cannot be effectively addressed without a formal, national capability dedicated to coordinating the collection, analysis and dissemination of information and intelligence from law-enforcement agencies, sporting organisations and the wagering industry, nationally and internationally.

The answer to the question of why a regulator is required has already been considered, assessed, and decided upon through the Wood Review and subsequently addressed through the resultant commitment and actions from government.

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. Options being considered will ensure that beneficiaries of the Government's response, including states and territories and sports, 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.

**Wood noted that Australia needed 'an independent, central, national body with the expertise and reach to monitor issues across the sports integrity continuum, and to ensure such issues that may require further action are systematically referred to law enforcement, National Sporting Organisations or other bodies as appropriate, for response. This includes monitoring and developing responses to new and emerging issues including the ongoing accreditation of athlete support personnel; supply and use of performance and image enhancing drugs; gender issues in sport; wagering on emerging sports without a controlling body (such as e-sports); child protection; and player welfare issues, particularly at junior level.'**

In addition, Wood noted that several small and emerging sports in Australia have limited resources, budgets and staff to deal with integrity issues, and need ongoing help from a central national body with the necessary expertise and international connections. Information provided by the ASC details that 64 NSO/NSODs are currently reliant upon Commonwealth Government funding to operate. This pressure is further supported by details at [table 1 Sports Top 4 Challenges](#) and at [Affordability of Sport](#).

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' as one of four key pillars.

To address broader sport integrity issues, the Wood Review made several recommendations including Sport Integrity Australia, to:

- 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.

Government has the capacity to intervene successfully though utilising the legislative powers, organisational capabilities, policies and activities of Sport Integrity Australia as the National Coordinator charged to protect the integrity of sport and the health and welfare of those who participate in Australian sport.

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.

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.

The Safety in Sport initiative, and subsequent 2023-24 MYEFO investment decisions, further demonstrate Government's commitment to protecting the physical and psychological safety of participants in sport.

## 2.2 What are the objectives

*'We are now witnessing a groundswell for equality in Australian sport, the likes of which we have not witnessed before in this country and, potentially, around the world. It is not just about greater financial investment in women's sport from government and the business community, it goes far deeper into the psyche of Australian sport. This is a generational change that we are witnessing. The tide is turning and the culture of sport in Australia is front and centre of everyone's mind, and Australia is leading the way. Our role within the sporting landscape has never been more important.'*<sup>64</sup>

The objective is articulated as – 'to protect the integrity of Australian sport and the health and welfare of those who participate in sport through the coordination of a national approach to all sports integrity matters'.

The objective is further expanded through the guiding principles of:

- Vision – Safe and fair sport for all
- Why – the positive impact sport has on Australian communities is worth protecting
- How – bring partners, sport and people together and provide support, advice and resources to identify and address threats to sports integrity. Protecting sport together.

All proposed activities seek to deliver against stated objective through the below 3 intervention approaches:

- 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.

The 3 underpinning objectives are detailed below. Noting that each option considers scalable capabilities and capacity to deliver existing programs. These objectives are enabled through the services and activities articulated in Sport Integrity Australia's Portfolio Budget Statements<sup>65</sup>.

### Address threats to the integrity of Australian sport

As Australia's NADO, our main responsibility is to implement the WAD Code in Australia, thereby protecting the health of Australian athletes and the integrity of sport. We achieve this through an informed and innovative anti-doping program encompassing testing, intelligence and investigations, engagement and education. We use various levers available to us to conduct deterrence, detection, disruption and enforcement activities, while collaborating with our partners and the sporting community. Our anti-doping program is consistent with international requirements and Australian legislation. We prioritise continuous improvement and innovation in the way we deliver our anti-doping program to keep athletes safe, introducing new processes and capabilities and finding creative ways to engage with and educate athletes. We will continue to support the athlete voice and educate the Australian sporting community.

We work with governments, sports, regulators, wagering service providers and law enforcement agencies to combat illegal activities such as competition manipulation (also known as match-fixing) by using coordinated responses.

We manage the NIF which is a set of policies all members of sport need to follow when it comes to their behaviour and conduct in sport. We provide the necessary resources and expertise to manage and support a transparent and independent integrity complaints process for conduct prohibited by sports' integrity policies. We liaise with sporting organisations to refine processes and policy to ensure matters are consistently, efficiently and effectively resolved.

Success will be measured by:

- The number of threat assessments and analytical reports that are completed and published
- Percentage of Australian Sports Commission (ASC) recognised sports' integrity policies that are reviewed and benchmarked against best practice standards.
- Percentage of ASC recognised sports that are compliant with anti-doping policy requirements.

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<sup>64</sup> David Sharpe APM OAM, Sport Integrity Australia CEO\_SIA 2022-23 Annual report

<sup>65</sup> [PBS 2023-24](#)

## **To protect the health and welfare of participants in Australian sport.**

To address integrity threats to sport in Australia, it is critical we establish a central information gathering, analysis, dissemination and coordination capability to ensure operational effectiveness and a holistic threat and intelligence picture as criminal activity does not align to international and state responsibility or legislative reach. The National Strategy for Information Sharing enables us to share information with law enforcement agencies and, where appropriate, receive information in return.

In strengthening our commitment to protect the integrity of sport, we have established a confidential reporting capability which enables athletes, administrators and others from across all sports to confidentially raise concerns relating to sports integrity issues. We provide the avenues for listening to and managing whistleblower disclosures, providing advice, supporting and protecting people who choose to report. We also provide access to free counselling for anyone involved in the complaints process or anti-doping rule violations.

Embedding safeguarding practices is in the best interest of sports organisations nationally, and the children, participants and the community they impact. To further embed a comprehensive culture of child safety and member protection in sport, we work with NSO/NSODs to implement the Safeguarding in Sport Continuous Improvement Program.

We work in partnership with the ACIC to identify and address risks of serious and organised crime within sport and provide consistent engagement with national and international sport stakeholders, including the Group of Copenhagen. The agreement with the ACIC includes the secondment of ACIC personnel from the ASIU to Sport Integrity Australia to facilitate a coordinated approach, supporting the development of the framework, policy and potential regulation around match-fixing, betting and wagering.

Success will be measured by:

- The percentage of sports capable of implementing a safe sporting environment for all participants, of all ages, across all levels of sport.
- Planned performance result to be set following baseline established from the Children's Perception of Safety in Sport Research Project.

## **Promote positive conduct in Australian sport**

Our vision of safe and fair sport for all cannot be achieved by us alone. Sport can only be safe and fair when all participants behave in a positive way that supports this cause.

Effective education and training for athletes and other participants is a key requirement of sporting organisations. Prevention is the first and most important line of defence against doping in sport and is achieved through effective engagement with participants, deterrence through effective and visible detection and enforcement and, critically, effective anti-doping education.

Athletes and support personnel are responsible for ensuring that they are 'knowledgeable of and comply with all applicable anti-doping policies and rules adopted under the Code'<sup>66</sup>. Ignorance of the anti-doping system resulting in a violation is not an effective defence, the Code operates essentially under a system of strict liability with respect to ADRVs.

International and domestic anti-doping arrangements can be complex and confusing. There must be sufficient emphasis on education to ensure that participants have an effective, values-based understanding of the dangers of doping to health and to sport and receive accurate and reliable information regarding anti-doping rules and banned substances and methods sufficient to avoid an ADRV, and an awareness of the risk of detection and consequences that apply.

The Wood Review noted that more training is required by the sporting sector for all participants – athletes, athlete support personnel (including parents, coaches, administrators, officials, medical staff et al) and NSO/NSOD and SSO executive teams, to ensure that athletes acquire a better understanding of their rights and responsibilities, and the reasons for them.

To achieve our vision, we deliver a range of policies and programs designed to mitigate and reduce sport integrity threats and encourage positive behaviour by all participants. This include the provision of consistent policies across all sports to set the expectations of the behaviours prohibited in sport, the enforcement of those policies and support services to promote and foster positive behaviours amongst all participants, at all levels of sport.

In particular, education and communications tools play a critical role in ensuring Australian participants know what standards of behaviour are and are not acceptable in sport, and in promoting positive conduct at all levels and across all

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<sup>66</sup> World Anti-Doping Code, World Anti-Doping Agency (effective as of 1 January 2015), art. 21.1.

roles. We provide education resources about sport integrity for all levels of athletes, their parents, coaches and support personnel. Through education and communications, we:

- ensure athletes and support personnel are aware of their rights and responsibilities when it comes to safe and fair sport
- empower the sporting community to speak up and report concerns
- instil positive behaviours in sport by providing tools, resources and information to enable the sporting community to be compliant with integrity policies
- prevent poor behaviour by building strong sporting cultures that value integrity.

Success will be measured by:

- Design and deliver a survey to measure behaviours in sport across core sport integrity themes. This will be used to establish baselines for survey data.
- Number of education programs completed.

## 2.3 Barriers to success

This section outlines the current and expected barriers and constraints to proposed government intervention and an initial assessment of success in achieving government objectives

The outcome of Sport Integrity Australia’s Annual Threat Assessment ‘Australia: threats to sport integrity 2023-24’ highlights some key sport integrity concerns. The assessment provides the critical nexus for a stronger relationship between Sport Integrity Australia and sports, shining a light on current and emerging integrity threats and driving how we can work in partnership across agencies, sectors and with sports to protect sports and their participants.

The significant level of investment in research will provide insight and evidence into areas that have not yet been explored and are not addressed within options proposed. Further consideration and investment from government or sport may be required to address any identified future threats or risks.

Barriers to success and actions to overcome and succeed, in addition to current governance, risk management and consultation practices, include:

Potential Barrier/Constraint	Action to address	Likelihood of success
Delays to capabilities further increasing the gap between the dopers and the testers	<ul style="list-style-type: none"> <li>• prioritise continuous improvement and innovation</li> <li>• ongoing investment in ASDTL capabilities</li> <li>• establish a central information gathering, analysis, dissemination and coordination capability</li> <li>• ensure policies and activities are evidence-based and informed by contemporary research</li> <li>• partnership with International Partners and representation on International forums and Committees.</li> </ul>	The proposal is seeking continuation of existing programs – this allows focus to be placed on ensuing that capabilities and capacity is dedicated towards the areas of greatest impact (or threat). With the level of expertise currently available within SIA and in partnership with key providers, the likelihood of success is considered good.
Broad and specific operational threats not identified	<ul style="list-style-type: none"> <li>• establish a central information gathering, analysis, dissemination and coordination capability</li> <li>• existing partnership with the ACIC</li> <li>• work with governments, sports, regulators, wagering service providers and law enforcement agencies to combat illegal activities through sharing intelligence, joint operations and coordinated responses.</li> <li>• partnership with International Partners and representation on International forums and Committees.</li> </ul>	Proposal will allow additional focus on both strategic and tactical intelligence that when acted upon and in conjunction with proposed joint operations will provided targeted deterrence and disruption effects. Likelihood of success is considered high.
No coordinated effort	<ul style="list-style-type: none"> <li>• Law Enforcement MOUs (National Strategy for Information Sharing)</li> <li>• proposed joint operational taskforce capability with embedded law enforcement</li> </ul>	Existing coordination mechanisms are already in place to enable coordinated effort across government entities. The additional

	<p>personnel and partnership with logistics and freight industry partners to disrupt and prevent supply of prohibited substances.</p> <ul style="list-style-type: none"> <li>dedicated TV/radio/online communication campaigns with partners such as the ASC, eSafety commissioner, AHRC and Play by the Rules.</li> <li>partnership with International Partners and representation on International forums and Committees.</li> </ul>	<p>capacity sought will increase the likelihood of these mechanisms being fully utilised with an mutually beneficial exchange across agencies. The likelihood of success is considered high.</p>
<p>Key messages and education are disjointed</p>	<ul style="list-style-type: none"> <li>dedicated TV/radio/online communication campaigns with partners such as the ASC, eSafety commissioner, AHRC and Play by the Rules</li> <li>ensure education and information campaigns are evidence-based and informed by contemporary research</li> <li>ensure athletes and support personnel are aware of their rights and responsibilities when it comes to safe and fair sport</li> <li>empower the sporting community to speak up and report concerns</li> <li>instil positive behaviours in sport by providing tools, resources and information to enable the sporting community to be compliant with integrity policies</li> <li>prevent poor behaviour by building strong sporting cultures that value integrity.</li> </ul>	<p>This capability will provide a multiplied effect to SIA's deterrence effect and provide mutually beneficial and consistent messaging across agencies and government programs. The likelihood of success is considered good and increasing to high over the out-years.</p>

In addition to the above, the success of achieving government objectives and management control of specific initiatives will be monitored and adjusted against the success metrics outlined within the IA ([Broader Sport Integrity Australia performance](#) and [Performance Measures](#)).

Three core risks are also identified in consideration of the successful delivery of the proposed objectives along with the strategies we have, or will put in place, to manage the identified risks.

#### **Enterprise Operations – Service delivery to athletes and sporting community**

##### **Risk Mitigation Strategies:**

- ongoing monitoring of performance and evaluation.
- policy based on research, data, engagement and evidence and map legislation to inform policy direction.
- dedicated resources to maintain the NIF and provide funding to sports to implement the NIF with a view to empowering sports to maintain the capability long term.
- integrity managers embedded in each sport as a key conduit into each sport to improve communication and stakeholder engagement.
- dedicated communication resources to synchronise and coordinate messaging to external stakeholders to ensure our approach is consistent.
- corporate reporting processes to account for our progress against government funded programs.

#### **Reputation - Ministers/Government, regulated cohort, partner organisations, broader external stakeholders**

##### **Risk Mitigation Strategies:**

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

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

### Risk Mitigation Strategies:

- 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.
- protect the integrity of our payments to third parties by focusing on preventing inaccurate payments, fraud and corruption using a range of control measures.
- risk, fraud, audit and assurance mechanisms support our system of monitoring and oversight.
- 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.
- 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.
- embedded 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.

Implementation of options and initiatives are considered low risk after completion of the Risk Potential Assessment Tool.

## 2.4 Why is it necessary to fund Sport Integrity Australia?

The establishment of 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 at [figure 16](#).

Figure 16



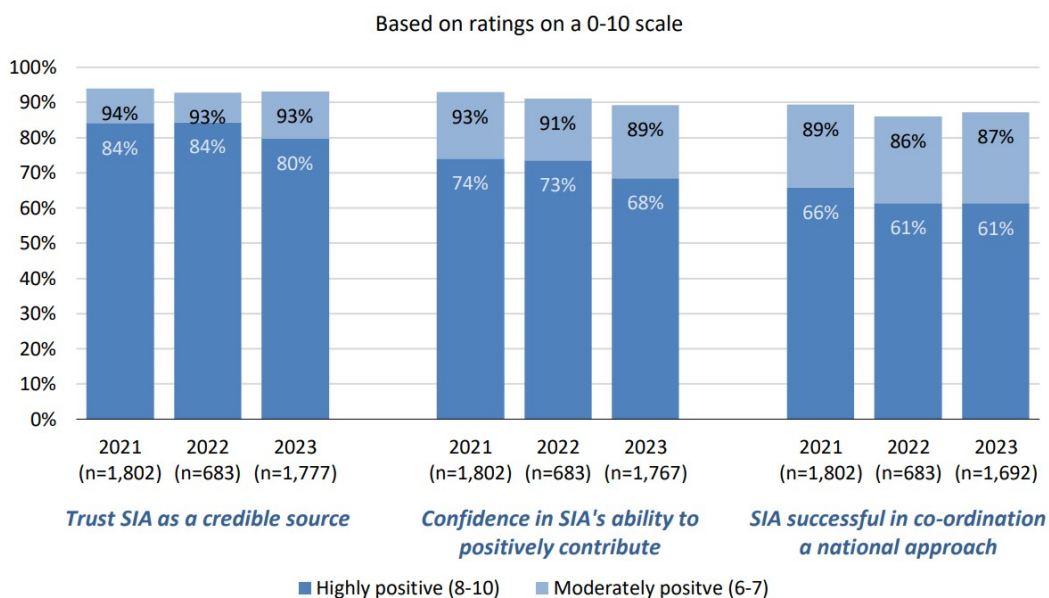
Government at all levels plays a leading role in enabling sport and sport related policies and programs. This includes the provision of support and funding to sporting organisations, clubs, and individuals. This includes being major investors and contributors to building and maintaining sports related 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 2023 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.

The Annual Stakeholder Survey collects feedback athletes, national sporting organisations, attendees of our education courses, law enforcement partners, and more with in excess of 2,200 respondents to the 2023 survey.

The Survey demonstrated that stakeholders continue to show a high level of awareness of Sport Integrity Australia and its role with 93% agreed that they ‘trust Sport Integrity Australia as a credible source of information on the integrity of sport’ (in line with 93-94% in previous years). Headline results were discussed in [Section 1](#). Further trend results are reflected in [figure 17](#).

Figure 17: Key overall perceptions of Sport Integrity Australia



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 Safeguarding the Integrity of Sport and Combatting Highly Sophisticated Doping

The proposed options will allow the Sport Integrity Australia to enhance and adapt its capability and services to support people at all sporting levels to address matters of integrity and fairness. Three options are presented, to support cultural change within sport and addresses critical capability gaps in the current system.

Securing ongoing funding will ensure that Sport Integrity Australia is able to maintain its current level of activity, services and independence. It will prevent responsibility and resourcing of 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/NSODs to ensure service 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 NIMs 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 safeguarding children and young people and discrimination.

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 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. 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.

Another opportunity is to strengthen collaborative efforts across law enforcement, intelligence, child protection and sport partnerships to identify intelligence threats, including doping methodologies, discrimination and abuse, with a view to shaping collaborative proactive strategies and targeted actions. These opportunities span preparedness, education, integrity, and safety in preparedness for major events and performance and criminal activity: across radicalisation and racism; transnational crime, drug importation and money laundering.

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

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?

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 and the impact of terminating measures at 30 June 2024 presented in [table 6](#).

Sport Integrity Australia activities are prioritised to ensure legislative requirements are met, including but not limited to:

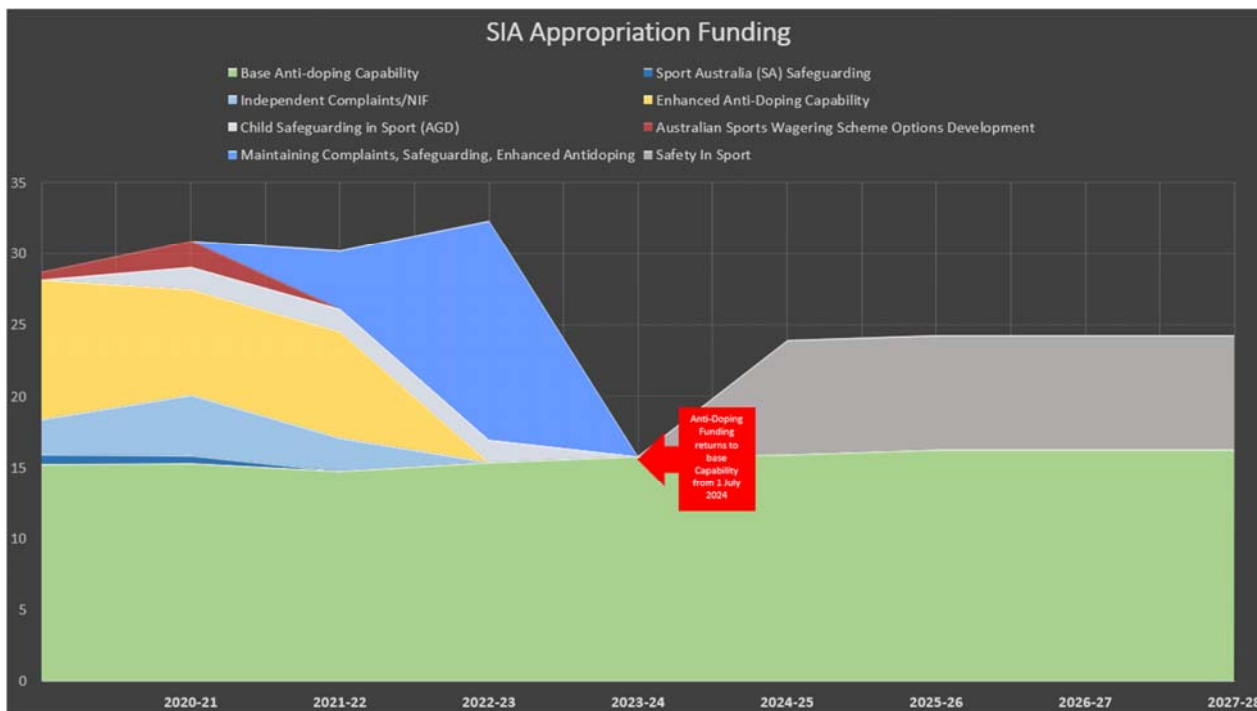
- Sport Integrity Australia's obligation to perform its functions within the framework set out by the Act and *Sport Integrity Australia Regulations*
- the PGPA Act and other relevant government legislation
- international obligations as detailed at [Attachment A](#).

The presented options will ensure there is sufficient budget to improve the anti-doping landscape and adequately address emerging integrity 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 NIMs in sports.



Sport Integrity Australia has an ongoing appropriation of approximately \$15m per annum as represented in [Figure 18](#) as 'Base Anti-doping Capability'. A further \$8m in ongoing appropriated is provided to address Safety In Sport issues. 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, with existing measures due to terminate on 30 June 2024.

Figure 18: Sport Integrity Australia Funding



If funding were to return to pre-2018 levels when we were solely an Anti-Doping agency (refer section '[Where we were](#)'), 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 independent complaints handling or the framework that protects sport from the threats of abuse, discrimination, mistreatment, safeguarding children and young people, racism, homophobia and gender equality across all levels of Australian sport, not just in the high-performance domain.

To better understand Sport Integrity Australia's costs, a high-level Activity Based Costing (ABC) process commenced in 2021. All activities are considered, 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 (AGCF).

To inform this assessment, one of the outcomes of the ABC exercise are discussed in table 6, outlining the impact that terminating funding measures will have on the sporting ecosystem if funding returns to pre-2018 levels.

Table 6: Impact of terminating funding on the sport ecosystem

Program	Impact
<b>Enhanced Anti-doping capabilities</b>	<p>Funding ceases: 30 June 2024                      Ref: Wood Review Recommendation 20, 52</p> <p>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.</p>

Program	Impact
	<p>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 Games at serious risk.</p> <p>Alternative: NSO/NSOs could potentially intervene and provide their own education and training packages to their athletes regarding antidoping. This would require additional resources within a sport and potential increase in funding requests to government. It would remove education level consistency across the sporting spectrum and remove the 'economy of scale' that currently exists by doing this work at SIA, utilising subject matter experts. Law enforcement could potentially intervene with increase intelligence and information sharing, though not considered likely due to prioritisation.</p>
<p><b>Australian Sports Drug Testing Laboratory</b></p>	<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, the SIA will need to absorb the cost of the ASDTL into its funding base. To accommodate these other key functions, SIA 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>Alternative: The use of International labs are an alternative to ASDTL for events other than international, however this may not reduce the cost of testing services on sport or the government, noting the cost of some international labs and the cost of freight could outweigh the current cost of using the ASDTL. Due to Australia's geographical isolation, and the International Olympic Committee requirement that negative anti-doping tests be reported within 24 hours, a WADA accredited laboratory must remain in Australia. This is not exclusively a capability for the Games, it needs to be maintained to host other major international sporting events in Australia. WADA is expected to engage and assess Australia's capability for sports drug testing on multiple occasions leading up to the Games</p>
<p><b>Play By The Rules Program</b></p>	<p>Sport Integrity Australia Funding ceases: 30 June 2024</p> <p>Ref: Wood Review Recommendation 20</p> <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> <p>Alternative: Other PBTR partners could increase their financial contribution to substitute SIA's contribution, however there is a risk that some may pull out of the scheme as a result– increasing the cost to other partners. NSO/NSODs could contribute funding or provide services themselves, however this would remove a consistently across the sporting spectrum and also remove the 'economy of scale' that currently exists along with information sharing, not to mention the circular funding argument of them seeking additional financial support from the government.</p>
<p><b>Support to the Pacific &amp; International Contributions</b></p>	<p>Funding ceases: 30 June 2024</p> <p>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).</p> <p>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</p>

Program	Impact
	<p>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. This is exemplified through SIA providing 6 staff to provide ORADO with additional skills and expertise to ensure a safe and fair 2023 Pacific Games.</p> <p>Impact: Without funding, SIA will be required to absorb mandatory contributions to WADA 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> <p>Alternative: Other Government agencies or NSO/NSODS could provide funding to meet these mandatory and voluntary contributions, however this is considered unlikely and if in place would see these entities seeking additional government funding or, like SIA, reduce other services provided.</p>
<p><b>Funding of the Australian Sport Intelligence Unit</b></p>	<p>Funding ceases: 30 June 2024</p> <p>Ref: Wood Review Recommendation 1, 11, 46</p> <p>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.</p> <p>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.</p> <p>Impact: Ratification of the Macolin Convention is at risk if the ASIU cannot be maintained or at an adequate level. Without funding, SIA will be required to absorb this cost into the operating budget by reducing activity and resourcing in other key functions. The risk of not meeting compliance obligations under our legislation and the conventions is heightened.</p> <p>Alternative: Other Government agencies could provide funding to meet this requirement, however this is considered unlikely and if in place would see these entities seeking additional government funding or, like SIA, reduce other services provided.</p>
<p><b>National Integrity Framework</b></p> <p><b>Complaints Handling</b></p> <p><b>National and State Integrity Managers</b></p>	<p>Funding ceases: 30 June 2024</p> <p>Ref: Wood Review Recommendation 47, 50, 51, 52</p> <p>The NIF 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.</p> <p>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.</p> <p>Alternative: Another Government agency or NSO/NSODS could potentially intervene and provide these services. This would require additional resources and potential increase in funding requests to government. It would also remove a consistency across the sporting spectrum and also remove the 'economy of scale' and independence that currently exists.</p>
<p><b>Safeguarding and Child Safeguarding</b></p>	<p>Funding ceases: 30 June 2024</p> <p>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 Safeguarding children and young people policies and the provision of capability building support to sports.</p> <p>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.</p>

Program	Impact
	Alternative: Another Government agency or NSO/NSODS could potentially intervene and provide these services. This would require additional resources and potential increase in funding requests to government.

### 3. What policy options are you considering?

As stated in the introduction, this IA looks across 4 genuine and alternative policy options as presented below.

Below points are provided to introduce this section and guide the decision maker:

- [Charging Options](#) – 2 options are considered within the IA. These are (i) full and (ii) partial charging. These can be considered against each of the 4 policy options presented. The charging options are only analysed within the charging section and are not reconsidered within each policy option (i.e. they do not constitute '8 Options')
- Option 1 is articulated as the status quo option and after initial analysis has not been considered further. This is articulated in more detail within said section
- Options 2, 3 and 4 after initial analysis, have been identified for more in depth analysis to inform, the ultimate policy decision.

#### 3.1 Status Quo (Option 1) - Basic Anti-Doping and Integrity Capabilities

As discussed under the heading of '[Current funding arrangements for Sport Integrity Australia](#)' and presented in [Figure 18](#), maintaining status quo will see some 50% of the activities and staffing level of Sport Integrity Australia terminating on 30 June 2024. This reduction would see funding return to pre-2018 levels when Sport Integrity Australia was solely a NADO without the remit it has today. A funding reduction of this size would see Sport Integrity Australia 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, engagement with sports and athletes, offer Anti-doping education and awareness-raising initiatives; and intelligence capabilities to better protect sport from the ever evolving doping threat. Options considered seek 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 Sport Integrity Australia is falling into a position that makes us non-compliant with the 2021 World Anti-Doping Code (WAD Code). Options considered will ensure the current level of Anti-doping capability does not significantly reduce with some activities ceasing altogether (for example face to face education, 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 Games 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 Sport Integrity Australia to ensure it has implemented and maintained standards at or above those specified in the following International standards for:

- Testing and Investigations
- the Protection of Privacy and Personal Information
- Therapeutic Use Exemptions
- Education
- Results Management
- 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 Sport Integrity Australia. Consequences of non-compliance are detailed in the International Standard for Code Compliance by Signatories (ISCCS) and may include;

- 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 of events.***

- 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 Sport Integrity Australia'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, 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 anti-doping and integrity compliance 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 NADO are prioritised, with coordination of other integrity matters significantly reduced or removed altogether. The programs, activities and services that will reduce or cease were outlined in [table 6](#). The anti-doping function would not evolve to be impactful in detecting, deterring or disrupting contemporary, let alone keeping pace with sophisticated 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.

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.

After initial analysis, Option 1 has not been identified for consideration as it fails to meet the recommendations of the Wood review, fails to address the identified problem and does not provide capability to meet the remit of Sport Integrity Australia as prescribed by Government. For completeness, the detailed analysis used to inform this decision is articulated the section titled [Option 1 benefits](#).

The remaining 3 options (2, 3 and 4) provide realistic options for consideration to continue and to enhance safeguarding the integrity of sport and combatting highly sophisticated doping, with increasing and scalable levels of capability and capacity.

## 3.2 Charging analysis and Charging options

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

The *Sport Integrity Australia Act 2020* allows Sport Integrity Australia to charge for functions relating to anti-doping.

Recommendation 1 from the Department of Health 2021-22 Portfolio Charging Review recommends that no changes are made to Sport Integrity Australia's existing charging arrangements under the National Anti-Doping Scheme, with fees to continue to be reviewed on an annual basis. Current fees were reviewed in December 2023.

Recommendation 2 from the Department of Health 2021-22 Portfolio Charging Review recommends Sport Integrity Australia seek to broaden the Sport Integrity Australia Act 2020 to authorise the CEO to charge for any services provided by Sport Integrity Australia rather than being restricted to functions under the National Anti-Doping scheme.

It is anticipated that if sport (NSO/NSODs) are not financially viable enough to absorb any change to charging arrangements, they would either:

- pass on the cost (full or partial) to athletes, participants, and community sport
- request more funding from government (a circular funding proposition)
- seek alternative providers, or reduce testing and education activities, and in turn limit Sport Integrity Australia's ability to shape compliance or behaviour\*.

\* The Australian National Anti-Doping Policy (2021) gives testing authority to Sport Integrity and not to NSO/NSOD's. This includes any tests classified as 'User Pay' by Sport Integrity Australia. In most cases sports are unable to conduct testing using another provider, they are obligated to use Sport Integrity Australia. It is noted that they could use a private provider to conduct required testing at an international event when the International Federation (IF) is the testing Authority. As a general statement, domestically sport needs to use Sport Integrity Australia and for any international events in Australia, they do not have to.

The Wood Review noted that Sport Integrity Australia (the then ASADA) *"is one of few NADOs that uses intelligence gathered through sample testing. It gleans valuable intelligence from testing activities done under user-pays arrangements that would otherwise be unavailable, and through understanding athlete linkages to support personnel and other members of the community. This can help ASADA to disrupt PIED distribution networks."* Any reduction in testing activity would lead to decreased intelligence.

## Introduction

This section analyses the opportunities, impacts/risks and evidence available to test the affordability proposition.

### Australian Government Charging Framework

The Department of Finance maintains and promotes the use of the Australian Government Charging Framework (AGCF) and Cost Recovery Guidelines when applying existing or considering potential government charging arrangements.

Every five years, each Department is scheduled to undertake a Portfolio Charging Review (PCR), with the PCR Terms of Reference agreed between the relevant Portfolio Minister and the Finance Minister.

The Department of Health and Aged Care undertook the most recent PCR in 2022 with high level details referenced in below sections. It is anticipated that the next PCR will be undertaken in 2027.

## Charging for Sport Integrity Australia’s activities

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 charged for under the Charging Framework reviewed in detail as part of the 2022 Health Portfolio Charging Review (PCR).

The only regulatory obligation under the Sport Integrity Australia Act and NAD Scheme relates to Sporting Administration Bodies (which includes NSO/NSODs) requiring them to have an Anti-Doping Policy that complies with the World Anti-Doping Code, International Standards and the NAD scheme (as stated under clause 2.04(a) of the NAD scheme).

Therefore, under the AGCF most current activities for Sport Integrity Australia cannot be classified as a cost recovery levy or fee but can be classified as a Resource Charge, providing a service that is available on an open and competitive market.

## Sport Integrity Australia Activity Based Costing and Funding Review

In June 2021, Sport Integrity Australia undertook an agency wide Activity Based Costing (ABC) and Funding Review. The key objectives of the review were to:

- inform cost recovery options for all agency activities and prepare for the then (and subsequent) Health Portfolio Charging Review/s (PCR)
- identify future resource requirements to deliver on all government intended outcomes and ensure the long-term financial sustainability of Sport Integrity Australia
- 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.

The Review included an Environmental Scan (from a charging perspective) which identified the appropriateness of any potential charging opportunities, it covered:

- the Industry Sectors impacted
- current and historic government policy positions
- existing Sport Integrity Australia charging arrangements, and
- SWOT Analysis.

All activities identified through the ABC across Sport Integrity Australia continue to be surveyed monthly and assessed for alignment to Sport Integrity Australia’s strategic objectives, Minister’s Statement of Expectations and AGCF for appropriate classification and any potential charging opportunities. The information and analysis is critical in informing options and potential costs for recovery under the AGCF.

The two charging options being presented in the section below consider;

1. Partial charging - primarily recovering the cost of testing and sample analysis from COMPPS sports
2. Full charging – recovering the cost of all chargeable agency activities from all NSO/NSODs on a per active member basis.

## What could we charge for?

This section provides a narrative to summarise agency activities that could be potentially charged for taken from the outcomes of the Health Portfolio 2022 PCR.

Table 7: Sport Integrity Australia Chargeable Activities

High Level Function	Currently recoverable under the AGCF	PCR Comments
Manage, plan, and oversee the general maintenance of Sport Integrity Australia’s anti-doping program (including policy development, planning, intelligence and science and medicine input)	Yes	Sport Integrity Australia controls the overall Testing plan. The ANADP gives testing authority to Sport Integrity and not to NSO/NSOD’s. This includes any tests classified as ‘User Pay’ by Sport Integrity Australia. In most cases sports are unable to conduct testing using another provider, they are obligated to use Sport Integrity Australia. It is noted that they could use a private provider to conduct required testing at an international event when the International Federation (IF) is the testing Authority. As it currently is for User Pays testing, this work can be charged as a Resource Charge as it is providing a service.
Management of user pays testing arrangements	Yes	



High Level Function	Currently recoverable under the AGCF	PCR Comments
Undertake missions for both User Pays and Government Funded testing as part of Sport Integrity Australia's anti-doping program	Yes	
Engage with and provide services and information to NSO/NSODs for NIF and the safeguarding of children and young people practices	Yes	There is no obligation for NSOs/NSODs to engage in these functions, therefore, they are not considered a regulatory activity. As a result, they cannot be charged as a Cost Recovery Fee or Levy under the Charging Framework. However, they could be charged as a Resource Charge as they are still providing a service to NSOs.
Maintain productive working relationships with key external partners and stakeholders (outside of NSOs) to inform Sport Integrity Australia outcomes	Yes	
Provide products and services to athletes to assist them to understand Anti-Doping policies and various integrity matters through external communication, events management, and education.	Yes	
Manage the Play by The Rules Program	Yes	
Establish, deliver and maintain an Independent Complaints Handling Model (ICHM) to support participants at all sporting levels	No	Similar to Ombudsman type service. It would be inappropriate to charge complainants or NSOs/NSODs depending on the number of complaints received as this could create a barrier or deterrent to participants at all sporting levels using the service
Provide education sessions on anti-doping and integrity matters to Schools (face to face and online)	No	Considering the service is being provided to Schools (most government funded) it would be inappropriate to charge schools when educating about anti-doping and sport integrity matters.
Provide advisory services to athletes to assist them to comply with Anti-Doping Policies through multiple channels including direct enquiry lines and mobile applications	No	It would be inappropriate to charge athletes or NSOs/NSODs depending on the number of enquiries received or the use of mobile applications as this could create a barrier to athletes using the service.
Risk Assessment / Backgrounding on potential internal and external engagements/appointments and Sport Grant applications	No	It would not be appropriate to charge risk assessment / background checks on sport grant applicants before they are approved.
Management of the Sport Integrity Program (Administered funding)	No	It would not be consistent across Government to charge for the management of an Administered program which is to provide support and services (in this case to sports and sporting communities in need).
Manage, assess and investigate any Adverse Analytical Findings (AAFs) or Anti-Doping Rule Violations (ADRVs) identified as part of Sport Integrity Australia's anti-doping testing program	No	Part of the investigations / sanctioning phase in the end to end Anti-doping program, therefore, cannot be charged under the Charging Framework.
Establish and deliver an international engagement strategy to exchange ideas and best practice on anti-doping & integrity matters	No	Not a regulatory activity, nor is a service being provided to NSOs/NSODs. Whilst extremely beneficial, this engagement is a choice by government (includes the government international commitments to UNESCO, WADA etc)

High Level Function	Currently recoverable under the AGCF	PCR Comments
Lead the agency's policy response to illicit drugs	No	Examining the current state and future planning of a potential government policy approach. Not appropriate to charge NSOs/NSODs any type of fee/levy/resource charge.
Review of Sports to identify alignment to Sports Integrity Australia Remit	No	Not a regulatory activity, nor is a service being provided to NSOs/NSODs. Therefore, this is not chargeable under the Charging Framework.
Provision of legal services regarding anti-doping, integrity threats and corporate related legal requirements	No	Legal services and court related matters are not cost recoverable under the charging framework as they relate to the sanctioning phase of the anti-doping and integrity matters
Participate in interagency projects	No	Would need to be assessed on a case by case basis. However, unless it is providing a service to industry (i.e. NSOs/NSODs or Sports Wagering Service Providers) then it is not chargeable under the Charging Framework.
Managing Covid 19 Agency Information	No	As this was only related to SIA internally, it is not a regulatory activity, nor is it providing a service to industry. Therefore, it is not chargeable under the Charging Framework.
Building and maintaining staff capability and culture for Sport Integrity Australia	No	As this function includes contributing to the Corporate Plan, Annual Performance Reporting, Business Planning (Branch, Section) etc. it is not chargeable under the Charging Framework as it is a direction from Government. It also includes general Executive meetings (i.e. SLG), which are a general exchange of information, therefore, not seen as providing a service to industry. Therefore, this would not be chargeable either.
Identify and report on issues, trends and impacts relating to sports wagering and competition manipulation, including the implementation of an Australian Sports Wagering Scheme (ASWS)	No	Currently this work does not relate to a regulatory activity of SIA. If the ASWS was to be approved by Government, then the ongoing work regarding the sports wagering and competition manipulation functions would be considered under the Australian Sports Wagering Scheme

In 2022-23, approx. 77% of the total cost of Sport Integrity Australia's activities could be classified as a Resource Charge, with 23% not cost recoverable under the AGCF. Included in the 77% are several activities which are not appropriate to charge for, as they relate to things like the Independent Complaints Handling Model and providing welfare, support and advisory services to athletes.

As a result, approximately 66% of Sport Integrity Australia's total costs could be charged to NSOs under the AGCF as a Resource Charge, ranging from a total of \$32m to \$39m per annum with an impact on sports ranging from \$0.300m to \$2.5m per sport per annum.

The intent is to not have a detrimental impact on the financial viability of sports or their service offering, or flow on effect to registration fees of participants. The AGCF 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.*'

## Charging Impacts

### Impacted industry sectors

NSO/NSODs are the key industry sector creating the need/demand for Sport Integrity Australia's integrity activities. There are currently 97 in total, refer to section detailing the [Australian Sporting Ecosystem](#).

64 of the 97 recognised NSO/NSODs receive funding from ASC through a Sport Investment Agreement, requiring them to provide information to the ASC including but not limited to financial, participation and workforce information.

COMPPS members provide a wide range of public benefits through a self-funding business model with most of their revenue 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.

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

### **Affordability of Sport**

Sports are struggling to remain financially viable, and the impact of increased costs can be detrimental to the existence of the club, increased participation fees could force parents to pull their children out of sports and clubs might be forced to prioritise other costs over the education of their administrators and the safety of their participants.

The May 2023 Australian Sports Foundation (ASF) report 'Clubs under Pressure'<sup>67</sup> (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 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.

The 'Matildas effect' has helped drive growth in girls and women football sign-ups by around one-third ahead of the coming 2024 winter season, and even higher in some areas. But the avalanche of interest means clubs face a heightened challenge in keeping players happy in often inadequate facilities and with substantial registration costs. Early figures from state federations suggest participation in women's football will grow by around one-third, with Football New South Wales (FNSW) and Northern NSW Football (NNSWF) both reporting 29% increases compared with this time last year. FNSW's fastest growing segment is senior women, where registrations have increased 34%, and women's sign-ups in the Southern Districts region of Sydney are tracking at a 74% rise. In the NNSWF, where women now represent close to 30% of all players, the general manager for member services, Ross Hicks, said the boom – driven at least in part by the Matildas' popularity – was stretching resources<sup>68</sup>.

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.<sup>69</sup>

Whilst the September 2021 ASF report titled Impact of Covid-19 on Community Sport<sup>70</sup> focused on the impact of COVID19, additional evidence through the ASC notes that NSO/NSODs 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. 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.

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 finding 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.

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.

<sup>67</sup> [Your Sport Your Say \(sportsfoundation.org.au\)](https://sportsfoundation.org.au)

<sup>68</sup> [Matildas effect drives record football sign-ups but puts clubs under pressure | Women's football | The Guardian](https://www.theguardian.com/sport/2023/may/15/matildas-effect-drives-record-football-sign-ups-but-puts-clubs-under-pressure)

<sup>69</sup> Western Sydney University report undertaken in 2020

<sup>70</sup> <https://asf.org.au/news/the-impact-of-covid-19-on-community-sport-september-report-update>

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<sup>71</sup> indicated that insufficient resources to support 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/NSODs 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)<sup>72</sup>.

### **Sport Australia role**

Sport Australia and the Australian Institute of Sport (AIS) are part of the ASC. Sport Australia is responsible for driving the broader sport sector including participation, supporting activities linked to sport and sport industry growth, and the Australian Institute of Sport (AIS) leads the high-performance sport system.

The ASC was established in 1985 under the Australian Sports Commission Act and operates in accordance with the Public Governance, Performance and Accountability Act 2013. The ASC is governed by a Board of Commissioners appointed by the Minister of Sport. The Board determines the ASC's overall direction, decides on allocation of resources and policy for delegated decisions and is accountable to the Minister for Sport.

### **Sport Investment Agreements (between NSOs and Sport Australia)**

All NSOs which receive funding from Sport Australia/AIS (currently approximately 61 of 96 recognised NSOs) sign a Sport Investment Agreement, which requires them to provide information to Sport Australia, including but not limited to financial, participation and workforce information.

The information received by Sport Australia is confidential and unit level data cannot be released or shared with other government agencies or the public without consent from each NSO. The ASC Act (s57A) does allow for disclosure of information to Sport Integrity Australia if certain conditions are met. Specifically, information can be shared if it relates to a sports doping and safety matter or is otherwise relevant to the performance of the functions of the CEO of Sport Integrity Australia.

The remaining recognised NSO's (approximately 35) which do not receive baseline ASC funding are only required to provide their audited financial statements on an annual basis to meet recognition requirements. This information is not analysed or kept in a single source document by Sport Australia.

### **NSO data provided via annual Sport Investment Agreements**

Funded NSOs are required to provide the following data to Sport Australia on an annual basis:

- Breakdown of revenue and expenses into standardised key lines and business units
- Surplus or deficit for the financial year
- Breakdown of Assets, Liabilities and Equity
- Breakdown of participation numbers by category (full member, school participant etc)
- Workforce data by category and gender (coaches, officials and NSO FTE) – noting workforce data is voluntary.

### **NSO financial Analysis**

The ASC has provided aggregated financial data relating to 2019 and 2020. They also advised:

- NSOs have different end dates for their financial years. Approx. 66% finish on 30 June, 30% on 31 December and a couple of others either 31 March or 31 October; and
- any NSOs which have recorded a significant surplus or deficit may skew the total deficit, and the related average deficit across funded NSOs.

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<sup>71</sup> SPORT Powering Australia's future (10+10) May 2021

<sup>72</sup> Clearing house for sport

In 2019 there were 60 funded sports. The total deficit across the 60 funded sports was \$4.4M (on average deficit of \$73,000 per NSO). This covers the financial years ended during 2019 (i.e. 31 March, 30 June, 31 October and 31 December 2019). All 7 COMPPS were funded during 2019.

In 2020 there were 61 funded sports. The total deficit across the 61 funded sports was \$15.4M (on average deficit of \$252,000 per NSO). This covers the financial years ended during 2020 (i.e. 31 March, 30 June, 31 October and 31 December 2020).

Of the COMPPS, only Netball Australia, Rugby Union Australia and the Football Australia were funded during 2020.

In 2021 and 2022 there were 64 funded sports of which the Sports Commission has data for the following 58 NSOs as represented in the table below.

[Table 8](#) demonstrates that those sports with the highest number of full active members have improved their financial position over time.

Table 8: Financial NSO data 2021 and 2022

58 NSOs Grouped by their Full Active Members 2021 and 2022		
NSOs Funded by ASC	Average 2021 Profit/Deficit (\$)	Average 2022 Profit/Deficit (\$)
Top 19	635,259.37	720,694.11
Middle 19	23,431.21	- 32,452.46
Bottom 18	167,276.50	123,275.52
Overall Average	277,252	273,135

#### Participation numbers (2018-19):

As unfunded NSO/NSODs are not required to provide participation figures, 2018-19 has been used to provide indicative information, as it is the most recent year where all 7 COMPPS received funding from the ASC and therefore were required to provide their participation numbers.

**For 2018-19**, the total exposure numbers reported were (includes full active members, programs, schools, events and 3rd party participants):

- A total of 18.0m participants across 62 NSO/NSODs.
- The 7 COMPPS comprised approximately 46% (approx. 8.3m), with the 4 COMPPS which are currently unfunded in 2021-22 (AFL, NRL, Tennis Australia, Cricket Australia) accounting for 29% (approx. 5.2m).

**For 2018-19**, the total number of full active members reported were:

- A total of 5.4m across 62 NSO/NSODs.
- The 7 COMPPS comprised approximately 46% (approx. 2.5m) and COMPPS which are currently unfunded in 2021-22 (AFL, NRL, Tennis Australia, Cricket Australia) accounting for 28% (approx. 1.5m).

To ensure the information received by the ASC remains confidential and unit level data was not released we received the below data which grouped the NSO/NSODs into thirds.

As the below data includes participation data from 2018-19 and financial data for the 2020 year, there is a mismatch between the NSO/NSODs included in the participation data and those included in the financial data.

As a result, there were 58 NSO/NSODs which were included in both data sets, therefore, the totals in [table 9](#) do not reconcile to the total participation numbers and average deficit identified on the previous slide (with the difference primarily relating to AFL, NRL, Tennis Australia and Cricket Australia as they were unfunded NSOs in 2020).

Table 9: Full active members

58 NSO/NSODs Grouped by their 2018-19 Full Active Members		
NSO/NSODs funded by ASC	Total 2018-19 Full Active Members	Average 2018-19 Full Active Members
Top 19	3,527,232	185,644
Middle 19	298,503	15,711
Bottom 18	32,539	1,808
Overall total/average	3,858,274	66,522

### Reliance on Government Funding

70% of NSO/NSODs receive funding from government which assists with their financial viability, and in many cases the ability to continue to operate. In the broad, Sport Integrity Australia does not charge government funded sports for these services on the basis the outcome would be circular and inefficient. It is noted however that sports who are government funded are charged for any international level events they are holding as set by respective international federations. World Record testing is also charged for. Giving government funding to sport to then take it away via charging and incurring an administrative cost for both government and sport would not achieve the objective of the AGCF.

Without this funding, NSO/NSODs would likely have to significantly scale back operations, including their workforce.

In 2021-22, 53 Australian sports plus an additional 8 sporting organisations for people with disability have at present been allocated a total of \$133.4M, with the largest contributions going to: Swimming (\$12.6M), Cycling (\$10.7M), Athletics (\$9.7M), Rowing (\$9.2M), Sailing (\$8.6M) and Basketball (\$7.7M).

Of the 64 funded NSO/NSODs, 22 (39%) received more than 50% of their revenue from the ASC in 2022-23.

## Threats and Risks

The AGCF sets an outline to this section as *'...in some cases either partial or no cost recovery may be appropriate, subject to the policy objectives and Government decision. For example, charging for a good or service may be inconsistent with the intended policy outcomes, such as the provision of community services or support.'*

[Table 10](#) outlines evidence that a charging regime adds little benefit back to the government bottom line (the circular funding argument). Will both directly and indirectly affect other government priorities across the areas of the economy, health and wellbeing, finance, and participation.

Table 10: Impact of charging/Strength and weakness assessment

Theme	Description	Source
<b>Industry participants are known and easily identifiable</b>	It is a requirement under the Charging Framework for all relevant industry participants to be known and there be an alignment to the relevant activities undertaken to enable an appropriate apportionment of Sport Integrity Australia's costs for cost recovery or resource charging purposes.	AGCF
<b>Sport Australia currently receives data on all NSO/NSODs that receive Government Funding</b>	All NSOs/NSODs which receive funding from Sport Australia (currently approximately 61 of 96 recognised NSOs) sign a Sport Investment Agreement, which requires them to provide information to Sport Australia, including but not limited to financial, participation and workforce information	ASC
<b>Sports may use other sample collection agencies</b>	User Pays (UP) NSO/NSOD's may seek alternate testing arrangements if the anti-doping testing fees were increased significantly* [*Sport Integrity Australia controls the overall Testing plan. The ANADP gives testing	

Theme	Description	Source
	<p>authority to Sport Integrity and not to NSO/NSOD's. This includes any tests classified as 'User Pay' by Sport Integrity Australia. In most cases sports are unable to conduct testing using another provider, they are obligated to use Sport Integrity Australia. It is noted that they could use a private provider to conduct required testing at an international event when the International Federation (IF) is the testing Authority]</p> <p>Therefore, if the UP fees were to increase significantly NSO/NSODs could choose to engage an international competitor to undertake their testing, which would be counterproductive to the Government's intended outcomes regarding an innovative and informed anti-doping program. Should testing be conducted outside of current arrangements, the impact would be twofold:</p> <ul style="list-style-type: none"> <li>• that SIA, and in turn the government, would not be able to assure itself, nor influence or shape, the integrity (thought a decrease in our intelligence gathering) and safety of sport within Australia, and</li> <li>• sport and participants would not have an independent and nationally consistent anti-doping, safety and integrity coordinator.</li> </ul>	
<b>It is likely the Government Funded NSO/NSODs would pay majority of an NSO/NSOD resource charge if implemented</b>	<p>If 'full active members' were used as a proxy to apportion a proposed charge, the Government Funded NSOs would pay approximately 70% of the total, with the AFL, NRL, Tennis Australia and Cricket Australia paying approximately 27% combined.</p> <p>If costs were split evenly between the 96 NSOs/NSODs, the Government Funded NSOs/NSODs would pay approximately 64% of the total, with the AFL, NRL, Tennis Australia and Cricket Australia paying approximately 4% combined.</p>	
<b>All NSO/NSODs would need to provide consent for Sport Australia to release their annual data to enable new charging arrangements to be implemented</b>	The NSO/NSOD data received by Sport Australia via annual Sport Investment Agreements is confidential and unit level data cannot be released or shared with other government agencies or the public without consent from each NSO/NSODs.	ASC
<b>Sports response to increased fees</b>	<p>Implementing a new resource charge will likely result in NSO/NSODs requiring additional government funding or increasing their participation fees</p> <p>Based on the combined financial results for all government funded NSO/NSODs in 2021 (\$16.6m - \$268k average) and 2022 (\$15.8m - \$275k average), it does not seem financially viable for the NSO/NSODs, nor would it be efficient for Government to charge those NSOs/NSOD that are already heavily reliant on Government funding (2022 based on the years ended 31 March 2022, 30 June 2022, 31 October 22, 31 December 2022).</p> <p>Alternatively, NSO/NSODs may choose to increase the participation fees for all sporting participants which will impact the regional/ grassroots level of sports which have been heavily impacted by COVID-19.</p> <p>Recent research <sup>73</sup> shows that community sport is under financial pressure with 52% of clubs surveyed reporting cost of living impacts as a growing barrier to member registrations and more than two in three (68%) having 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 and 28% reported a decrease in their financial reserves in the last 12 months, with an average of a \$30,891 drop in cash reserves among this group.</p> <p>This financial pressure has led to 27% of clubs reporting a decline in registrations among 15-19 year-olds, which could have future implications for the health of the nation and Australia's proud record as a highly successful sporting nation.</p> <p>Recent data from the Australian Sports Commission (ASC) AusPlay survey reveals that the cost of sport in Australia --- as well as time commitments --- are two of the most common reasons why many kids</p>	<p>Australian Sports Foundation</p> <p>Confederation of Australian Sport</p> <p>Australian Sports Commission</p>

<sup>73</sup> [ASF Research Confirms Community Clubs are Under Pressure | Australian Sports Foundation](#)

Theme	Description	Source
	<p>across the country aren't participating. Children were less likely to participate if they were from a low-income family, lived in a remote or regional area, or spoke a language other than English at home. It also shows families on average spend \$600 per child last year on sport, compared to \$520 in 2019.</p> <p>The Confederation of Australian Sport submission of November 2021 'Get Sport 2030 Back on Track'<sup>74</sup> noted that the high level of ongoing fees to be charged by Sport Australia would ensure that many of Australia's 90+ NSOs/NSODs would not be able to afford to take part, and that the situation is clearly to the detriment of Australian sport and of the grass-roots sporting community.</p> <p>A 2018 study <sup>75</sup>conducted Western Sydney University found respondents were paying over A\$1,100 on average to play a sport each season. On top of this, they were spending A\$450 on transport, bringing the total sport participation cost to around A\$1,500 per person per season. The study showed that around 10% of respondents had borrowed money (not including credit cards) to participate in sports at an average of A\$5,000 per person. Thirty-five percent of respondents also reported greater credit card debt due to sport fees. Participation costs were also found to be a major barrier for many children wanting to play sport.</p>	
<b>A new quality assurance process would need to be implemented if charging was reliant on the NSO/NSOD data obtained by Sport Australia</b>	For this data to be relied upon on an ongoing basis, all NSOs/NSODs would need to be subjected to a new data verification process undertaken by Sport Australia, which will increase the compliance costs across the sector as these activities would be added to any cost recovery/resource charging arrangement.	ASC
<b>Manipulation of data</b>	<p>NSO/NSODs may look to 'game the system' if new government charging was to be approved and implemented.</p> <p>If cost recovery/resource charging arrangements were to be introduced, NSO/NSODs may look to provide inaccurate data or change their business practices to reduce the amount they are required to pay. For example – NSO/NSOD's may look to provide lower full active member numbers, if the charge was apportioned based on full active members.</p>	
<b>User Pays NSO's/NSODs may seek alternate testing arrangements if the anti-doping testing fees were increased significantly</b>	<p>UP NSOs/NSOD are not obligated* to utilise Sport Integrity Australia's anti-doping program and testing services [*Sport Integrity Australia controls the overall Testing plan. The ANADP gives testing authority to Sport Integrity and not to NSO/NSOD's. This includes any tests classified as 'User Pay' by Sport Integrity Australia. In most cases sports are unable to conduct testing using another provider, they are obligated to use Sport Integrity Australia. It is noted that they could use a private provider to conduct required testing at an international event when the International Federation (IF) is the testing Authority].</p> <p>Therefore, if the UP fees were to increase significantly the UP NSOs/NDOS could choose to engage an international competitor to undertake their testing, which would be counterproductive to the Governments intended outcomes regarding an innovative and informed anti-doping program.</p>	
<b>Cost of Redress</b>	<p>Specific data, research or impact analysis regarding the potential financial impact on sport in Australia is not yet publicly available.</p> <p>It is noted that under the legislation, institutions (including sport) must demonstrate their capacity to pay redress for current and any possible future applicants over the life of the Scheme. The scheme has established Funder of Last Resort (FOLR) provisions, institutions may be able to partly participate in the Scheme if the relevant jurisdiction/s agree to be a funder of last resort for the institution. If FOLR is agreed, the cost of redress will be shared between the jurisdiction/s and the Commonwealth government. Funder of Last Resort will not usually be agreed if the institution unable to participate is a sporting organisation, and the state or national organisation for that sport has the means to assist the institution to join the Scheme but will not do so.</p>	National Redress Scheme

<sup>74</sup> [Confederation of Australian Sport - 2022-23 Pre-Budget Submissions \(treasury.gov.au\)](https://www.treasury.gov.au/~/media/2022/02/Confederation-of-Australian-Sport-2022-23-Pre-Budget-Submissions)

<sup>75</sup> [Institute for Culture and Society | Opinion: Pay to Play: Is Participating in Sport Becoming too Expensive for Everyday Australians? \(westernsydney.edu.au\)](https://www.westernsydney.edu.au/~/media/2018/06/Institute-for-Culture-and-Society-Opinion-Pay-to-Play-Is-Participating-in-Sport-Becoming-too-Expensive-for-Everyday-Australians?)



Theme	Description	Source
<b>Barriers to participation</b>	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 indicated that insufficient resources to support 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/NSODs can no longer retrofit their business models to fit an outdated funding model.	<i>SPORT Powering Australia's future (10+10) May 2021</i>
	Beyond Australia's borders, major sporting events provide a platform in diplomacy matters. Australia recognised this potential value in Sport Diplomacy 2030, with a key focus of the plan being to ' <i>promote Australia as a host of choice for major international sporting events and ensure that we leverage the wider economic opportunities</i> '.	Sport Diplomacy 2030
	14 million Australians participate in sport annually, 1.8 million volunteer 158 million hours each year, and 220,000 are employed across the sector, helping to generate approximately 3 per cent of national GDP. It provides an estimated \$83 billion in combined economic, health and educational benefits each year, with a return on investment of \$7 for every dollar spent	Sport 2030
<b>Health and wellbeing</b>	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).  Aboriginal and Torres Strait Islander youth who participate in sport are 3.5 times more likely to report good general health and 1.6 times more likely to have no probable serious mental illness.	Clearing house for sport  <i>Health benefits of physical activity: (Warburton, Bredin, 2017)</i>
	Physical activity is associated with numerous health benefits in school-aged children and youth. The dose-response relations between physical activity and health that were observed in several observational studies suggest that the more physical activity, the greater the health benefit. However, the results from several experimental studies suggested that even modest amounts of physical activity can have tremendous health benefits in high-risk youngsters (e.g., obesity, high blood pressure).	<i>Health benefits of physical activity and fitness in school-aged children and youth (Janssen, LeBlanc, 2010)</i>
	Systematic reviews and/or meta-analyses have demonstrated a dose-response relationship between physical activity and premature mortality and the primary and secondary prevention of several chronic medical conditions. The relationships between physical activity and health outcomes are generally curvilinear such that marked health benefits are observed with relatively minor volumes of physical activity.	<i>Benefits of Recreation and Sport (paper to support the strategic plan for the Office for Recreation and Sport, 2016)</i>
	Efficient cognitive functioning in pre-adolescents requires not only an adequate intelligence quotient (IQ), but also high levels of executive function development (such as motivation, the ability to set goals, and self-control), which is fostered by engaging in sport. Furthermore, results suggest that it is worthwhile engaging in sports in late childhood because it positively influences cognitive and emotional functions.	<i>Physical Activity and Cognitive Functioning of Children</i>
	The reported benefits of participation in sport and physical recreation have been exhaustively catalogued. A review of literature indicates the consistency of findings, across cultures, of benefits in the areas of childhood and lifelong health; in the areas of learning and academic achievement; in the areas of citizenship and democratic access; and in the areas of leadership and motivation.	<i>Benefits of Recreation and Sport (paper to support the strategic plan for the Office for Recreation and Sport, 2016)</i>

Theme	Description	Source
<b>The role of Education</b>	<p>Education plays a critical role in ensuring Australian participants know what standards of behaviour are and are not acceptable in sport, and in promoting positive conduct at all levels and across all roles. Through education we ensure athletes and support personnel are aware of their rights and responsibilities when it comes to safe and fair sport, empower the sporting community to speak up and report concerns, instil positive behaviours in sport by providing tools, resources and information to enable the sporting community to be compliant with integrity policies, prevent poor behaviour by building strong sporting cultures that value integrity.</p> <p>Education is a proven method to reduce the incidence of integrity breaches. This is best demonstrated through our supplement education program, which reduced the number of ADRVs committed by athletes from 17 a year in 2016/17 to 0 a year in 2021/22 and 2022/23. This led to approximately \$400,000 saved in science, legal and investigation costs each year, had no education been undertaken.</p> <p>Education is also a critical engagement tool for SIA to build strong partnerships and relationships with sport. As both a regulator and preventer, SIA often places significant compliance burden on sports. Being able to offset that compliance burden by providing free education (designed to risk the incidence of complaints in their sport) leads to stronger engagement with sports in compliance process.</p> <p>The risks associated with SIA charging sports for education include:</p> <ul style="list-style-type: none"> <li>• With sporting organisations still struggling financially post COVID-19, it is likely that they may not prioritise or have funds to purchase education from SIA or have the resources to deliver it themselves.</li> <li>• This could lead to less education in sports, leading to weaker protection of all participants, less reporting of issues and greater integrity risk in Australian sport</li> <li>• Lower quality and less-informed education in sporting organisations, especially since education delivered by sports would not be informed by the internal education holdings held by SIA and day-to-day expertise of SIA staff</li> <li>• Education only provided in small pockets of certain sports, creating inconsistent messaging, increasing the risk of confusion for who, how and where to report.</li> <li>• Less brand awareness of SIA, leading to less trust in the Australian Government to manage complaints on their behalf.</li> </ul>	<i>Sport Integrity Australia Director Education</i>

### 3.3 Charging Options

#### 3.3.1 Partial Cost Recovery (Low)

The following section discusses Sport Integrity Australia’s current charging regime and methodology for establishing our fees. This is the preferred charging option, provides the most efficient use of NSO/NSOD and government resources and provides a reasonable return to government without financial detriment or regulatory burden on industry. Option also ensures that ASDTL meets minimum testing numbers required to maintain WADA their Accreditation – needed for 2032 and green and gold decade with international events coming to Australia and the 2032 Games.

#### Anti-Doping Testing

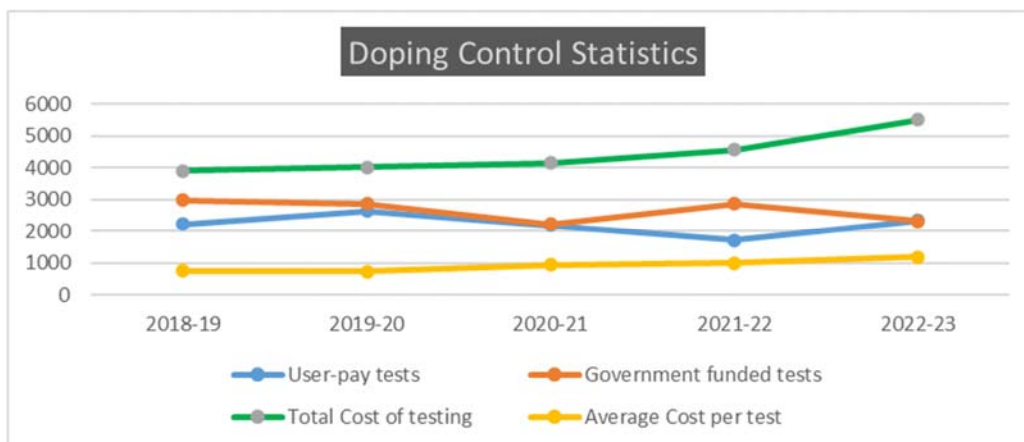
Sport Integrity Australia currently undertakes anti-doping testing for all NSO/NSODs with an anti-doping program (93 Of the 97 NSO/NSODs).

Over the last 3 years the majority (55%) of the testing was funded by Government, the remaining 45% of tests are paid for under a User Pays (UP) arrangement, refer [table 11](#). The UP arrangements were via agreed MOUs with COMPPs including the NRL, AFL, SANFL, WANFL, Football Australia, NBL, Cricket Australia, Rugby Australia, Stawell Gift, Triathlon Australia and in some years with Swimming Australia.

Table 11: Tests undertaken over 5 years

	2018-19	2019-20	2020-21	2021-22	2022-23
User-pay tests	2232	2648	2190	1723	2339
Government funded tests	2973	2875	2224	2870	2320
<b>Total tests</b>	<b>5205</b>	<b>5523</b>	<b>4414</b>	<b>4593</b>	<b>4659</b>

Table 12: Testing and average cost of testing over 5 years



### Considerations when setting the anti-doping fees

Professional and COMPPS are generally unfunded from government and are the basis for our User Pays arrangements. NSO/NSODs are not obligated\* to utilise Sport Integrity Australia’s anti-doping program and testing services and could choose to engage an international competitor to undertake their testing which would remove Sport Integrity Australia’s, and the government’s, visibility regarding the outcomes of each test. [\*Sport Integrity Australia controls the overall Testing plan. The ANADP gives testing authority to Sport Integrity and not to NSO/NSOD’s. This includes any tests classified as ‘User Pay’ by Sport Integrity Australia. In most cases sports are unable to conduct testing using another provider, they are obligated to use Sport Integrity Australia. It is noted that they could use a private provider to conduct required testing at an international event when the International Federation (IF) is the testing Authority].

This is a significant risk for Sport Integrity Australia and works against the government policy intent to deliver an informed and innovative anti-doping program. As a result, it is critical for Sport Integrity Australia to consider their competitors and align their pricing accordingly.

As the UP arrangement is classified as a Resource charge it can be calculated on a commercial, value based or cost recovery basis.

An external review of our fees methodology was undertaken by Callida Consulting Pty Ltd in 2019 and confirmed that our prices are competitive compared to other providers on the basis that the overhead costs of maintaining the ASDTL were not passed on to clients. This also assumed that the direct cost of sample collection was charged to clients and not the associated overhead costs or indirect costs of the anti-doping program such as science and medicine, investigations, intelligence etc.

A further benchmarking review of the cost of the ASDTL was undertaken by Callida Indigenous Consulting Pty Ltd in 2023 and confirmed that the sample analysis prices charged by the lab were competitive compared to other international labs when overhead costs were removed.

The UP arrangement provides approximately \$1.7m in revenue per annum, with methodology briefly discussed below.

### Methodology for Charging User Pays NSOs

The methodology is based on the effort undertaken by Casual Field Staff, capturing the end to end sample collection process from Pre Mission Planning to Post Mission report/ review and incorporates Lab, Freight and Sample Collection equipment costs. It does not capture costs relating to Test Planning, Intelligence, Investigations and other work associated

with Results Management. Notwithstanding that approach, certain User Pays clients are provided with Results Management services.

### Australian Sports Drug Testing Laboratory (ASDTL)

The ASDTL completes analysis on all domestic anti-doping tests undertaken by Sport Integrity Australia. In lieu of other international alternatives, the ASDTL is critical to Sport Integrity Australia's anti-doping program.

Likewise, the drug testing performed by Sport Integrity Australia is critical to ASDTL, as the minimum testing volumes provided by Sport Integrity Australia's anti-doping program allows the ASDTL to WADA accredited. To maintain WADA accreditation, the ASDTL must undertake a minimum testing volume of 3000 units per annum.

### Current rates

[Table 13](#) outlines the current rates charged for UP anti-doping testing. The methodology and rates were reviewed in early 2024 and are published on the [agency website](#).

Table 13: Sport Integrity Australia fees

Test type	Fees 1 January 2024 (\$AUD)
<b>Urine collection, transport and analysis</b>	
Full-screen urine# (In Competition – usually done out of hours)	\$875
Half-screen urine# (Out Competition – usually done in hours)	\$768
Urine ESA – analysis only on an existing collection	\$212
GHRFs (small) – analysis only on an existing collection	\$85
IRMS – analysis only on an existing collection	\$696
<b>Blood collection, transport and analysis</b>	
Blood hGH	\$319
Blood ABP	\$584
Blood ESA	\$345
Blood ESA – analysis in conjunction with an existing blood collection^	\$212
hGH – analysis in conjunction with an existing blood collection^	\$186
Additional charge per hGH/ESA blood collection – out of hours	\$239
<b>Other testing fees and charges</b>	
Missed mission fee	\$503
Small session testing levy^ (per mission)	\$165
Short notice call out fee (per call out)	\$321
<b>Dry Blood Spot collection, transport and analysis</b>	
Dry Blood Spot collected in conjunction with other Collection (i.e. Urine)	\$247
Dry Blood Spot Only	\$589
Short notice cancellation fee	\$310
Fast turnaround (per batch)	\$531
Additional time charges (per hour) – Doping Control Officers	\$70
Additional time charges (per hour) – Chaperones	\$49
Additional expenses charges – flights, accommodation, etc.	At cost

### Calculating the total cost of the anti-doping program

Whilst it is integral Sport Integrity Australia sets its rates in line with its 'competitors,' it is important to understand the true cost to government of running an end-to-end, WAD code compliant anti-doping program. The following analysis includes the costs of the following high level agency functions:

- Manage, plan and oversee the general maintenance of Sport Integrity Australia's anti-doping program – including activities from across the functions of policy, testing, intelligence, education and science and medicine
- Management of UP testing arrangements

- Undertaking missions for both UP and GF testing as part of Sport Integrity Australia’s anti-doping program – activities testing /field operations, science and medicine as well as the ASDTL
- Managing, assessing and investigating any Adverse Analytical Findings (AAFs) or Anti-Doping Rule Violations (ADRVs) identified as part of the anti-doping testing program – activities include investigations, science and medicine and intelligence.

An appropriate portion of support staff and overhead costs are applied to the direct costs for each of the high-level functions to reflect the total cost incurred as represented in [table 14](#) and [table 15](#).

Table 14: Average Cost per test in 2022-23 – end to end anti-doping program

<u>Average cost per test</u>	
Total tests	4,659
Total Cost of anti-doping program (\$m)	\$20,713,631
Average Cost per test	\$4,445

Table 15: Average Cost per test in 2022-23 – cost of testing only

<u>Average cost per test</u>	
Total tests	4,659
Total Cost of testing (\$m)	\$5,520,000
Average Cost per test	\$1,185

### **Play by the Rules Program**

‘Play by the Rules’ (PBTR) is a platform that provides information, resources, media campaigns and online learning about issues that impact on safe, fair and inclusive sport. PBTR was developed as the result of collaboration and cooperation between the ASC, the AHRC and all state and territory agencies responsible for sport and recreation, equal opportunity and anti-discrimination.

Following the recommendations of the Wood Review of Australia’s Sport Integrity Arrangements, the management of the Australian Government’s primary contribution to PBTR was transferred from ASC to Sport Integrity Australia on 1 July 2020.

Administration of the PBTR is primarily undertaken by Sport Integrity Australia who employs the manager and undertakes financial and contract management. A Management Committee oversees the strategic direction and planning, budget priorities and supports the manager. A reference group provides operational support.

The objectives of PBTR are to deliver education and training that supports environments that are safe, fair and inclusive for sport and recreation; harness networks to deliver messages that promote and support environments that are safe, fair and inclusive for sport and recreation, and deliver resources that support environments that are safe, fair and inclusive for sport and recreation.

PBTR is funded by the contributors listed in [table 16](#), with Sport Integrity Australia’s contributions reflective of the Administration of the program.

Table 16: Parties to the Play by the Rules program

Parties to the Play by the Rules Memorandum of Understanding	
Sport Integrity Australia	Anti-Discrimination Commission of Queensland
Australian Sports Commission	Australian Human Rights Commission
Northern Territory Anti-Discrimination Commission	The Northern Territory of Australia, care of its agency Department of Tourism and Culture
ACT Human Rights Commission	Government of New South Wales, represented by the Office of Sport (Sport and Recreation NSW)
Victorian Equal Opportunity & Human Rights Commission	Government of Queensland, represented by the Department of Housing and Public Works (Sport and Recreation)
South Australia Equal Opportunity Commission	Government of South Australia, represented by the Office for Sport, Recreation and Racing
Office of the Children's Guardian	Government of Tasmania, represented Communities, Sport and Recreation, Communities Tasmania
Anti-Discrimination Board of NSW	Government of Victoria, represented by the Department of Jobs, Precincts and Regions – Sport, Recreation and Racing
Western Australian Equal Opportunity Commission	Government of the ACT, represented by Sport and Recreation
Equal Opportunity Tasmania	Government of Western Australia, represented by the Department of Local Government, Sport and Cultural Industries

An annual MoU is entered into with all contributors which sets out, amongst other matters, the financial contributions provided.

### Consultation

We have directly consulted with sport on this partial cost recovery option. Sport Integrity Australia has engaged with stakeholders over many years regarding its current charging regime which has established the existing group of User Pays clients. Through direct discussion with sports over time, it is apparent that other than the COMPPs, most sports do not have the financial ability to pay for testing, let alone other services offered by Sport Integrity Australia.

### Summary

Due to the NSO's financial position, the added responsibility applied under the National Redress Scheme, the detrimental impact COVID-19 and the rising cost of living has had on regional / grass root sports, and the fact that many are heavily reliant on Government funding, it is financially viable and most efficient to continue to charge those sports that request a user pays testing arrangement.

The current methodology for setting fees has been independently validated, is competitive, attracts revenue to government and does not negatively impact the financial viability of sports.

## 3.3.2 Full Cost Recovery (High)

### Preferred proxy to apportion costs under a potential cost recovery levy or resource charge

There is no direct link between Sport Integrity Australia's effort and the information currently captured by Sport Australia.

There are three possible proxy options for charging NSOs;

- Full active members
- Total exposure numbers reported (includes full active members, programs, schools, events, and 3<sup>rd</sup> party participants)
- Shared evenly between all NSOs.

Of the information currently captured (profit, participation numbers and workforce data), it is felt participation numbers would be the most reasonable reflection from a cost recovery/charging perspective.

Of the 2 participation number options, it is considered 'full active members' is a more appropriate proxy, as the 'total exposure numbers' included other categories such as schools and 3<sup>rd</sup> party participants which could skew the overall percentages across financial years.

While financial information submitted to Sport Australia is reconciled to audited financial statements on a key line basis, all other information received from NSOs is predominantly self-reported, with limited verification performed by Sport Australia.

Therefore, if used for cost recovery or charging purposes in the future a new and enhanced data assurance function would need to be funded, implemented and maintained. Under these circumstances, the additional costs incurred by Sport Integrity Australia would be passed on and recovered from NSO's via the approved charging arrangement.

With reference to [table 7](#), Sport Integrity Australia Chargeable Activities, in 2022-23, approximately 77% of Sport Integrity Australia's activities could be classified as a Resource Charge, with 23% not cost recoverable under the Charging Framework. Included in the 77% are several activities which are not appropriate to charge for, as they relate to things like: the Independent Complaints Handling Model and providing welfare, support and advisory services to athletes.

As a result, approximately 66% of Sport Integrity Australia's total costs (\$27.4m) could be charged to NSOs under the Charging Framework as a Resource Charge.

Based on 2022-23 information and the percentage of full active members split by funded and unfunded NSO's, [table 17](#) demonstrates the annual charge and regulatory burden to sports under this charging option, noting that government funded sports would wear 70% of the charge (approximately \$19.21m) per annum.

Table 17: Regulatory burden of Full Cost Recovery – split by NSO Group

<b>NSO RESOURCE CHARGE - ESTIMATED BREAKDOWN</b>				
<b>NSO Group</b>	<b># NSOs</b>	<b>% of total full active members</b>	<b>Average cost per NSO (\$m)</b>	<b>Total Contribution (\$m)</b>
Unfunded COMPPS: AFL, NRL, Tennis Australia and Cricket Australia	4	27%	\$ 1.85	\$ 7.41
Funded COMPPS: Netball Australia, Rugby Union Australia and Football Australia	3	18%	\$ 1.65	\$ 4.94
Funded non-COMPPS: 56 NSOs	56	52%	\$ 0.25	\$ 14.27
Unfunded non-COMPPS: 34 NSOs	34	3%	\$ 0.02	\$ 0.82
	<b>97</b>	<b>100.00%</b>		<b>\$ 27.44</b>

### Consultation

It is preferred for industry participants (sport) to be consulted prior to a decision by government, however due to political sensitivities, this is not always possible (i.e., consulting with sport on a potential charging option that is later rejected by government is expected to create unnecessary angst between sport and government).

We have not directly consulted with sport on this option, however Sport Integrity Australia has engaged with stakeholders over many years regarding its current charging regime which has established the existing group of User Pays clients. Through direct discussion with sports over time, it is apparent that the majority do not have the financial ability to pay for testing, let alone other services offered by Sport Integrity Australia.

### Summary

Due to the NSO's financial position, the added responsibility applied under the National Redress Scheme, the detrimental impact COVID-19 and the rising cost of living has had on regional / grass root sports, and the fact that many are heavily reliant on Government funding, it doesn't seem financially viable or efficient to recommend new Resource Charges that could impact those sports from \$250k to \$1.65m per annum.

If new government charges were approved it is likely NSOs would increase their participation fees at all levels of sport, further impacting everyday Australians across regional Australia.

As a result, Sport Integrity Australia is not recommending the full cost recovery option be applied to sports.

## 3.4 Funding Options

Funding is required by government to maintain and enhance current anti-doping and integrity capabilities, programs and services to address the policy problem outlined in this IA. Funding will enable Sport Integrity Australia to continue as the national coordinator charged with the protection of the integrity of sport and the health and welfare of those who participate in it.

### To combat highly sophisticated doping

Effectively combating highly sophisticated doping requires an anti-doping program which is innovative and informed. It requires a broad range of expertise and capability to keep pace with changing substances and methodologies through investment in capabilities critical to ensuring Australia's anti-doping program is fit for purpose and able to provide athletes and sport participants with trust in the system.

WADA recently flagged the need for NADOs to move their thinking and capability investment decisions away from being reactive to specific doping scandals and immediate reaction from stakeholders and the public for urgent and effective action, towards a proactive approach that goes beyond crisis management. WADA has identified a number of trends, opportunities and risks at their November 2023 meeting for consideration by members. A number of these have informed the considered options, in particular:

- Proliferation of new doping technologies in pursuit of human high performance
- Anti-doping increasingly addressed in conjunction with sport integrity issues
- Stronger focus on prevention – education, intelligence and investigations becoming a priority
- Use of Artificial Intelligence, data analytics and machine learning in anti-doping.

Each option outlines scalable uplifts in:

- scientific expertise, equipment and research capabilities which are critical to ensuring emerging threats are addressed.
- intelligence, investigations and forensic tools to close the gap between evolving innovations (such as artificial intelligence, crypto currency and encrypted messaging) and Sport Integrity Australia's current capabilities through a marked increase in staffing capabilities, a major uplift in strategic intelligence, information and data analytics, digital technologies and investigations
- targeted education solutions for women and girls and our First Nations participants around the health effects of doping and ethical sportsmanship, in addition to the education of young people regarding the dangers of PIEDs has direct social and community impacts with The Australian Secondary Schools Alcohol and Drug Survey showing 2 to 3% of secondary school students have used anabolic steroids (48,000 teenagers).

Education is key to raising awareness of and deterring inappropriate behaviour. The Wood Report recommended an increase in outreach, education and training capacity 'to ensure a better understanding by athletes of the Code, its processes and their rights and responsibilities, in particular with an enhanced reach to those below national level, including pipeline and development athletes'. This was further supported by WADA Director General Olivier Niggli (2017) when he said 'Further to our efforts to detect and deter doping, the 2015 ADRVs Report reminds us of the importance that preventative education strategies play in the fight against doping. Values-based education is one of our core priorities as we engage with athletes to discuss what motivates them to stay clean, why they must not dope and how they can protect themselves against it'.

In excess of 5,000 athletes received anti-doping education sessions in 2022-23 and 4,659 doping tests were completed, these activities need to increase and expand to be across all levels of sport.

## To provide evidence-based policies, programs, and services

Option 4 (high) provides funding for establishment of the Sport Integrity Research Institute, within existing governance structures, 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 Sport Integrity Australia'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 the rapidly evolving science and technology advancements that enables sophisticated doping. This will inform our intelligence, operations and ASDTL capabilities and investment priorities. It will also explore whether safety, integrity and cultural issues are barriers to women and girls, First Nations people, those from a CALD background, LGBTIQ+ and 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 recently announced First Nations skills program. It would also identify the next tranche of integrity focused actions for Sport Integrity Australia 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, safeguarding of children and young people, 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.



While there are some positive attitudes towards women and girls in sport, change is still required in terms of underlying beliefs and behaviours – 28% of women have considered leaving their sporting club due to inequitable treatment<sup>76</sup>.

## To ensure Sport Integrity Australia continues to meet the objectives of government and provide ongoing protection of the integrity and safety of sport

Scalable funding options are considered to both maintain and enhance its response to competition manipulation, safeguarding of children and young people and member protection threats through policy and program development, direct funding and resource support to sports, and education and communication programs. These functions underpin the remit of Sport Integrity Australia to respond to safety in sport issues.

Each option would enable Sport Integrity Australia to continue to build on the significant progress made in safeguarding, and further support the development of an operational strategy, outlining agency efforts and priorities to specifically reduce the identified threat. The efforts in this space will include working with the National Office for Child Safety to support the harmonisation of legislation to keep children safe and delivering the Safeguarding in Sport Continuous Improvement Program (SISCIP) which will support sporting organisations to embed child safe practices, member protection and drive a positive cultural shift, with 22 sports already signed up. It will provide further assurance to deliver against Sport Integrity Australia's Child Safe Policy. The gives guidance on the processes and procedures to ensure children's safety and wellbeing across all areas of Sport Integrity Australia's work, specifically to recognise children's rights, member protection and interests and to build and maintain a safe culture and environment.

Options presented would ensure Australia remains compliant with international legal obligations and provide direct support to the government's Pacific capacity building programs through education and engagement programs to prevent, detect, and deter regional and specific doping threats.

### 3.4.1 Option 2 (Low)

As discussed at '[Current funding arrangements for Sport Integrity Australia](#)' and presented in [table 6](#), maintaining status quo will see over 50% of Sport Integrity Australia's core anti-doping and integrity funding reduce 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 broader integrity matters. The status quo 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 option seeks \$129 million over 4 years with ongoing funding of \$22 million per annum, provides minimum level capability to continue services tied to measures terminating on 30 June 2024. It would ensure ongoing delivery of legislative and international obligations, detailed at [Attachment A](#), which is a requirement for Australia to compete at international events. It will also enable continuation of complaint handling, education and capacity building for sports and participants.

Funding would allow Sport Integrity Australia to continue specific initiatives including:

- a WAD Code compliant national anti-doping program including education, testing, science, medicine, intelligence, investigations and therapeutic use exemptions and results management that meet the required International Standards (as regulated by WADA). It will maintain an understanding of evolving science and technology such as gene doping and editing, and the role of artificial intelligence in scientific analysis, interpretation and assessment of results

<sup>76</sup> The 2022- 2023 'State of Play survey' by the Office for Women in Sport and Recreation (Vic government)

- a digital forensic and financial analysis capability to enable extraction of data from digital devices including mobile phones, laptops, tablets, and other storage devices to combat sophisticated doping methodologies and technology to leverage powers
- a joint operational taskforce capability with embedded law enforcement personnel and partnership with logistics and freight industry partners to disrupt and prevent supply of prohibited substances
- a base level of grant funding to the Oceania Regional Anti-Doping Organisation (ORADO) to coordinate a prevention, detection and deterrence anti-doping program among Pacific countries; grant funding to UNESCO to assist 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) which are required as a signatory to the WAD Code
- an international engagement program to represent the Australian Government in international forums, such as UNESCO Convention and Council of Europe matters, the Anti-Doping Convention and Macolin Convention, and acting as the Minister's Registered Deputy on the WADA Executive Committee as required by WADA
- maintenance of foundational operational capability across anti-doping and integrity complaints to ensure clear, consistent processes and an associated quality assurance framework, as well as appropriate training including mandatory Australian Government Investigations Standards qualifications
- expansion of ASDTL's highest priority testing capabilities, including development of capability for large peptide hormone testing in blood, compliance with WADA technical document for human growth hormone, expanded Athletes' Biological Passport program to two further modules covering endocrines and steroids in blood
- continue operation of the complaints service for sports to ensure matters regarding discrimination or child harm and neglect, where required, can be investigated independently and externally of the sport as recommend by the 2021 AHRC 'Change the Routine' Report
- ensure that NIMs remain embedded within NSO/NSODs to promote and implement the NIF within their sport and maintain strong and mutually beneficial relationships with the sports sector
- maintain national safeguarding policies, resources, and education as recommended by the National Office for Child Safety. This would include the existing safeguarding in sport continuous improvement program and provide education packages in Australian Sign Language (Auslan) for participants in deaf sports
- maintain the ASIU as the central information gathering, analysis and dissemination and coordination capability, critical in ensuring Australia's response to match fixing is effective and to meet the requirements of Article 13 of the Macolin Convention, as recommended by the Wood Review
- maintain the Play by the Rules national online training platform and integrated training program and support that is provided by Sport Integrity Australia to State and Territory sports agencies. This would ensure that the current 4000+ Member Protection Information Officers, which are embedded in community sporting clubs, have ongoing education and upskilling to embed integrity at community level sport.

#### Fiscal impact of Option 2 (Low)

	\$ millions	2024-25	2025-26	2026-27	2027-28	Total
Sport Integrity Australia – Payment		TBA	TBA	TBA	TBA	TBA
Sport Integrity Australia – Capital:		TBA	TBA	TBA	TBA	TBA
Sport Integrity Australia – Revenue		TBA	TBA	TBA	TBA	TBA
DISR – Payment		TBA	TBA	TBA	TBA	TBA
<b>Total Impact on Underlying Cash:</b>		TBA	TBA	TBA	TBA	TBA

### 3.4.2 Option 3 (Medium)

Option 3 will provide a sufficient level of capability, staffing resources and expertise to proactively address current and future doping and integrity threats and equip government with leading testing technologies to address highly sophisticated doping methodologies and respond to evolving WADA requirements.

There will be significant investment into doping testing, intelligence capability, direct and embedded support to sport and capacity building with Pacific partners.

**In addition to** capabilities delivered in Option 2, this option seeks \$153 million over 4 years with ongoing funding of \$39 million per annum to provide:

- enabling capabilities to strengthen our understanding of anti-doping and the sport integrity threat environment. The impact of this investment would be an increase in targeted operations, an increased deterrence and disruption effect, and an increase in investigation outcomes.

- an uplift in operational capability to ensure more efficient targeting of anti-doping and integrity activities. This would be enabled through an additional 14 staff to provide a dedicated tip-off channel, establishment of a human source capability, and dedicated capability to partner with banking and industry sectors. The impact of this investment would be an increase in operational activity targeted at perpetrators that are not identified through traditional methods.
- expansion of Australian Sports Drug Testing Laboratory (ASDTL) capability and capacity through new technology and 14 additional staff to ensure the laboratory can deliver world's best practice anti-doping testing in line with the annual requirements released by World Anti-doping Drug Authority (WADA) that set out new requirements. The impact of this investment would be that Australia maintains its ability to host major sporting events and participate in international events and the ASDTL maintains its WADA accreditation.

Within these initiatives, Sport Integrity Australia will be able to provide:

- dedicated support in the Pacific region through capacity building workshops and training on current anti-doping threats and issues and contract resources to build capability and anti-doping compliance with UNESCO.
- capability building activity within the Asia and Oceania regions by partnering with INTERPOL, WADA and Drugfree Sport NZ to establish a Global Anti-Doping Intelligence and Investigations Network connecting experts from Anti-Doping Organisations and respective law enforcement agencies and facilitate their work in the fight against doping, PIED trafficking and manufacturing.
- expansion of the National Integrity Capability Enhancement Program and incorporate new State Integrity Managers to be embedded within State/Territory departments of sports, National integrity networks and agencies of Community Sport Australia (i.e. Sport NSW, Vicsport, SportWest) to ensure the NIF is implemented at all levels of sport.

Fiscal impact of Option 3 (Medium)

\$ millions	2024-25	2025-26	2026-27	2027-28	Total
Sport Integrity Australia – Payment	TBA	TBA	TBA	TBA	TBA
Sport Integrity Australia – Capital:	TBA	TBA	TBA	TBA	TBA
Sport Integrity Australia – Revenue	TBA	TBA	TBA	TBA	TBA
DISR – Payment	TBA	TBA	TBA	TBA	TBA
<b>Total Impact on Underlying Cash:</b>	TBA	TBA	TBA	TBA	TBA

### 3.4.3 Option 4 (High)

Option 4 will provide a superior level of investment in research and evaluation 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 combatting sophisticated doping and prevent integrity issues including new and emerging threats.

It will provide a significant investment in public education and awareness, expanded capacity in complaint handling and collaboration across sport.

**In addition to** capabilities delivered in the Options 2 & 3, this option seeks \$168 million over 4 years with ongoing funding of \$42 million per annum and provides investment in the key initiatives and provide:

- establishment of a Sport Integrity Research institute through partnering with Australian Universities to keep pace with rapidly evolving integrity threats and sophisticated doping methodologies. It will ensure agency programs, and services are fit for purpose to deal with contemporary and emerging issues and threats and enable evidence-based policy advice and capability development. It will also provide additional capacity to liaise with sport and develop research programs, build national and international partnerships and strategies that address contemporary integrity issues, encompassing abuse, mistreatment, protection of children, young people and those with increased vulnerabilities, racism, antidoping measures, and competition manipulation across all levels of Australian sport.
- a proportionately scaled increase in complaint handling staff, and their capability, to meet the forecasted growth in the volume, complexity and seriousness of complaints.
- dedicated TV/radio/online communication campaigns with partners such as the ASC, eSafety commissioner, AHRC and Play by the Rules partners. This would include initiatives such as community forums, and an annual

'good sports' award recognising positive behaviours and role modelling across all levels of sport. The recent Start to Talk campaign<sup>77</sup> advertisement on child safety was played on over 30,000 radio and 10,000 TV broadcasts.

- development and support the role of Member Protection Information Officers through programs and comprehensive evaluation surveys to ensure the effectiveness of the NIF and broader integrity policies through all levels of sport, community perception, and state and club's interpretation. It would also ensure Sport Integrity Australia's education packages are of value to all sports, not just NSO/NSODs.

Fiscal impact of Option 4 (High)

<b>\$ millions</b>	2024-25	2025-26	2026-27	2027-28	<b>Total</b>
Sport Integrity Australia – Payment	TBA	TBA	TBA	TBA	TBA
Sport Integrity Australia – Capital:	TBA	TBA	TBA	TBA	TBA
Sport Integrity Australia – Revenue	TBA	TBA	TBA	TBA	TBA
DISR – Payment	TBA	TBA	TBA	TBA	TBA
<b>Total Impact on Underlying Cash:</b>	TBA	TBA	TBA	TBA	TBA

<sup>77</sup> [Start to Talk: new Child Safe Sport awareness campaign | Sport Integrity Australia](#)

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

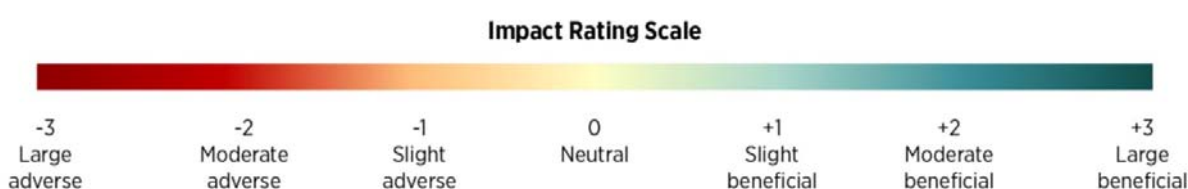
Each of the options presented will provide capabilities and initiatives that will underpin recent government announcements to increase, and maintain, participation and to expand the appeal of sport within society. Without implementing one of the proposed options, these broader initiatives will have limited impact.

The following is a discussion on who is likely to be affected by the options and the economic, competition, social, environmental, or other costs and benefits.

Where available, information to quantify both the benefits and 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.

The assessment uses a 7-point scale at [figure 19](#), indicating the anticipated impact of changes on particular stakeholder groups relative to the status quo.

Figure 19



Changes which result in a beneficial impact for stakeholders, or reduce burden, have been rated as positive. Changes that increase operating costs, risk, burden or result in a detrimental impact for stakeholders have been rated as negative. The neutral rating was used both to signify minimal impact and used for impacts that have not yet been assessed as they are to be determined through future changes (and will undergo further assessment and consultation as required).

While numbers have been applied to this rating scale, these are intended to support accessibility and readability of the ratings rather than representing a numerical result.

### 4.1 Option 1 (Status Quo) – Basic Anti-Doping and Integrity Capabilities

Segment	Positive impact	Negative impact
<b>Government</b>	<ul style="list-style-type: none"> <li>• Cost saving of over \$16m in terminating funding can be reprioritised by government</li> <li>• Remaining funding will be used to retain Sport Integrity Australia’s basic anti-doping and integrity capabilities</li> </ul>	<ul style="list-style-type: none"> <li>• High risk of WADA non-compliance. Consequences of non-compliance are fully detailed at the <a href="#">WADA non-compliance</a> discussion in Section 3. Key impacts are detailed below:               <ul style="list-style-type: none"> <li>○ Exclusion from participation in or attendance at the Olympic Games and Paralympic Games</li> <li>○ Impact on hosting regional, continental or world championships</li> <li>○ ineligible to hold any WADA office or any position as a member of any WADA board or committee or other body.</li> </ul> </li> <li>• Significantly decreased capacity to have a central point of contact for athletes, sporting organisations, Sports Wagering Service Providers (SWSP), and other stakeholders for matters relating to sports integrity.</li> <li>• Significantly decreased capacity to have a central responsible body for centrally coordinating sports integrity policy</li> <li>• Inability to provide direct assistance to small and emerging sports in Australia that lack capacity to deal with integrity issues</li> <li>• Deficiencies and impediments in the ability to collect, analyse and disseminate information and intelligence relating to the full complement of integrity issues at the national level hinders effective coordination across stakeholders, and increases the overall risk of compromises of Australian sport and sporting competitions<sup>78</sup></li> </ul>

<sup>78</sup> The Wood Review

		<ul style="list-style-type: none"> <li>• Key functions of SIA will cease or be significantly reduced (for example intelligence functions, innovative education practices, funding for NIMs) as a reprioritisation of remaining funding will be required to ensure WAD Code compliance, as SIA would be required to absorb the cost of the ASDTL into its funding base.</li> <li>• While sports integrity resourcing and capability varies considerably across NSOs, it generally diminishes quickly beyond elite levels and professional sports<sup>79</sup></li> <li>• 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 Games at serious risk.</li> <li>• Increased number and amount of ASC grants required to fund NSO/NSOD integrity 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 NIMs.</li> <li>• Without a focus on anti-doping and integrity there will be an indirect impact to other government priorities such mental health, obesity, equality, and diversity, participation</li> <li>• Ratification of the Macolin Convention at risk if the Sports Betting Intelligence Unit cannot be maintained or at an adequate level.</li> <li>• Inability to respond in a timely manner to ADRVs or other matters with increased risk and consequence of negative media</li> <li>• Loss of trust and negative public perception of sport as equitable and fair, leading to decreased participation and loss of income to the economy.</li> </ul>
<b>NSO/NSODs, SSO &amp; sporting clubs</b>	<ul style="list-style-type: none"> <li>• Decreased government regulation and compliance requirements</li> <li>• NSO/NSODs 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.</li> </ul>	<ul style="list-style-type: none"> <li>• High risk of WAD non -compliance and Australia's ability to host the 2032 Games</li> <li>• Delayed response times for to ADRVs or other matters</li> <li>• 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 AHRC 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</li> <li>• Insufficient education and research into barriers of entry to sport including diversity and culture</li> <li>• 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</li> <li>• 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/NSOD and SSOs and sporting clubs</li> <li>• Increased reliance on Commonwealth and State and Territory government funding for sport to deliver where there is a shortfall in safety and support programs. Australian sport 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.</li> </ul>
<b>Participants and community</b>	<ul style="list-style-type: none"> <li>• Participants 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;</li> </ul>	<ul style="list-style-type: none"> <li>• High risk of WAD non -compliance and Australia's ability to host the 2032 Games</li> <li>• 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</li> <li>• Insufficient education and research into barriers of entry including diversity and culture</li> <li>• 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</li> </ul>

<sup>79</sup> The Wood Review

	industrial relations; and criminal law.	
<b>At risk cohorts</b>	<ul style="list-style-type: none"> <li>Cohort 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.</li> </ul>	<ul style="list-style-type: none"> <li>Limited member protection, education, avenues to raise complaints and concerns, and access to support services and referrals. The lack of these are expected to see both decreased participation in sport and an increased likelihood of deliberate and unintentional harm.</li> <li>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 with no focus on barriers to the participation of at risk cohorts.</li> </ul>
<b>International and Pacific partners</b>	<ul style="list-style-type: none"> <li>Australia's financial contribution to WADA is mandatory, this contribution will be prioritised from SIA budget to maintain an accredited NADO status.</li> </ul>	<ul style="list-style-type: none"> <li>Voluntary support to UNESCO and ORADO will reduce or cease altogether which will significantly impact the development of regional capability. Sport Integrity Australia will be required to absorb mandatory contributions into the operating budget by reducing activity and resourcing in other key functions.</li> </ul>
<b>Overall assessment &amp; Impact Rating</b>	<p><b>Assessment</b> - 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 other 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.</p> <p><b>Government Objectives:</b> Not met</p> <p><b>Impact Rating:</b> Largely adverse (-3), noting almost certain risk of areas of non-compliance with WADA, 2032 Games being at risk, and the financial and regularity burden placed on sport.</p> <p><b>Headline - The identified policy problem is not met by the status quo and is not considered further.</b></p>	

### Regulatory burden estimate (RBE)

The total annual ongoing cost of maintaining a highly effective integrity and anti-doping regime is represented in Option 4 (High) at \$42 million per annum. A status quo scenario requires Sport Integrity Australia to absorb some \$10 million to fund continuation of the ASDTL, with remaining funds prioritised towards a WAD Code compliant anti-doping program, which as demonstrated in this analysis is unlikely to be sufficient to remain compliant.

There are two solutions available to meet a status quo scenario and enable Sport Integrity Australia to implement a highly effective integrity and anti-doping regime including the [Full Cost Recovery Option](#) or revert complaints handling, the prevention of serious child safeguarding issues, associated investigations and welfare support and a level of anti-doping activity including testing and education to sports leaving the full \$42 million to be funded by individuals, businesses or community organisations should a decision be made to not continue funding. This would be achieved through investment of their own time and resources funded via government grants, business income, or personal income/time.

Sport Integrity Australia's ABC process was used to determine the percentage of activities (at a high level) as a proportion of total agency activity and used to apportion residual regulatory costs per [table 18](#).

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.

Table 18: Regulatory Burden Estimate under a status quo option

Average annual regulatory costs				
Change in costs (\$ million)	Individuals	COMPPs/Business/State Government	Non-COMPPs and community sport	Total change in cost (\$m)
Consideration and evaluation of future trends and emerging risks in sport (i.e. new sports, illicit drugs)	-	\$0.08	\$0.02	\$0.10
International engagement	-	\$1.75	\$0.44	\$2.19
End to end Anti-Doping Program (excluding Education)	-	\$18.68	\$4.67	\$23.35
Identify and report on issues, trends and impacts relating to sports wagering and competition manipulation	-	\$0.81	\$0.20	\$1.01
Management of externally focussed sport related programs (i.e. PBTR)	-	\$0.47	-	\$0.47
NSO and Athlete engagement, products and services (including education)	\$0.47	\$7.58	\$1.42	\$9.47
Information Co-ordination to combat threats to sport integrity including competition manipulation, doping, child safeguarding and member protection.	\$0.01	\$0.16	\$0.03	\$0.20
Provide safe and independent service channels for sporting participants (including welfare support, ICHM and confidential reporting)	\$0.26	\$4.10	\$0.77	\$5.13
Provide strategic intelligence to combat threats to sport integrity including competition manipulation, doping, child safeguarding and member protection.	-	\$0.08	-	\$0.08
<b>Total by sector</b>	<b>\$0.74</b>	<b>\$33.71</b>	<b>\$7.55</b>	<b>\$42.00</b>

Options 2, 3 and 4 are analysed in the tables below.

In summary – each of the 3 options would protect the health and welfare of participants in sport of all ages, sports administrators, coaches and officials, sport parents and guardians, while maintaining the integrity and reputation of Australia’s anti-doping program and the benefits that sport brings as a vital building block of thriving and inclusive Australian communities. It will enable Sport Integrity Australia to make the right intervention at the right time. The objective is about deterring prohibited conduct and levelling the playing field in respect to sport integrity, awareness and resources for all athletes no matter their socioeconomic background, diversity group, gender or if they are in a remote or rural location. It would have a positive impact on participation and diversity in sport.

The impact across the breadth of the Australian community is broad, 15.8 million Australians participated in sport annually, either through an organisation or venue. In 2022, an estimated 3.4 million Australians participated in non-playing roles in the sport and active recreation sector at least once. Over 90% of these participants (3.1 million) were volunteers directly enabling the estimated 70,000+ registered not-for-profit sports clubs currently operating in Australia<sup>80</sup>.

## 4.2 Option 2 (Low)

Segment	Positive impact	Negative impact
<b>Government</b>	<ul style="list-style-type: none"> <li>Continuation of Australia’s NADO capability and recognition</li> <li>Retention of a national body to centrally coordinate all sports integrity policy and responses to address anti-doping and sport integrity issues through the continuation of Sport Integrity Australia, partnering with state and territory law</li> </ul>	<ul style="list-style-type: none"> <li>Inability to keep pace with ever evolving sophisticated doping threats and testing needs</li> <li>Anti-Doping and Integrity programs and support not informed by adequate levels of</li> </ul>

<sup>80</sup> June 2023 AUSPLAY survey



	<p>enforcement through MOUs. Over 170 matters have been referred to law enforcement for consideration of action demonstrating the success of this partnership in addressing integrity matters.</p> <ul style="list-style-type: none"> <li>• Continuation of administer a confidential complaints handling and reporting (whistle-blower) scheme encompassing all sports integrity issues.</li> <li>• The opportunity to overcome the silo effect that currently exists where multiple bodies including NSOs, law-enforcement and regulatory agencies are engaged, and where the difficulties in securing a coordinated response are compounded by a federal system with differences in state/territory and federal regulatory and criminal laws<sup>81</sup>.</li> <li>• Provision direct assistance to small and emerging sports in Australia that lack capacity to deal with integrity issues</li> <li>• Australia maintains ability to host major sporting events and participate in international events is maintained through expansion of high priority testing capabilities for the ASDTL, engendering international confidence in the integrity of Australian sport and in turn the provision of a WAD Code compliant national anti-doping program.</li> <li>• Continuation of a single, easily identifiable education and outreach platform dedicated to developing and coordinating education, training and outreach resources and programs</li> <li>• Pacific capacity building programs are supported through education and engagement programs to prevent, detect, and deter regional and specific doping threats.</li> <li>• Australia's response to match fixing is effective and requirements of the Macolin Convention are met through maintenance of the ASIU as the central information gathering, analysis and dissemination and coordination capability.</li> </ul>	<p>contemporary research leading to outdated materials and methods and increased cost of administration. Research will not extend beyond anti-doping or sports betting</p>
<p><b>NSO/NSODs, SSO &amp; sporting clubs</b></p>	<ul style="list-style-type: none"> <li>• Anti-doping and sport integrity issues and supporting polices and activities are coordinated and guided at a National level through the continuation of Sport Integrity Australia</li> <li>• Australia retains its NADO capability and recognition to allow sport to host major events and participate in international competition.</li> <li>• Anti-doping capabilities to keep pace with current methodologies current through SIAs digital forensic capability.</li> <li>• Basic capabilities maintained to enable the continuation of SIA complaint handling services - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, SIA has managed over 1400 allegation-based integrity matters.</li> <li>• Embedded NIMs are maintained to assist with implementation of integrity policies and practices.</li> <li>• Access to current online education platform and services are maintained including the Play by the Rules program and support to the current 4000+ Member Protection Information Officers, which are embedded in community sporting clubs who provide education and upskilling to at community level sport.</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Outreach limited to NSO/NSODs only . While SIA have supported 85 sports in signing up to the NIF and supported by funding 19 embedded NIMs, 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 NIF, 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.</li> </ul>
	<ul style="list-style-type: none"> <li>• Participants are assured of the integrity of sport through continuation of SIAs current capabilities and services</li> </ul>	<ul style="list-style-type: none"> <li>• Anti-Doping and Integrity programs and support not informed by adequate levels of contemporary research leading to outdated</li> </ul>

<sup>81</sup> The Wod Review

<b>Participants and community</b>	<ul style="list-style-type: none"> <li>• Participants have access to SIA's base level complaint handling - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, SIA has managed over 1400 allegation-based integrity matters.</li> <li>• Participants, volunteers and coaches have access to current online education platform and services including the Play by the Rules program</li> <li>• 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 SIA to positively contribute towards protecting the integrity of sport in Australia.</li> </ul>	<p>materials and methods and increased cost of administration. Research will not extend beyond anti-doping or sports betting</p> <ul style="list-style-type: none"> <li>• Only core outreach from SIA via limited face to face education sessions, communications products</li> </ul>
<b>At risk cohorts</b>	<ul style="list-style-type: none"> <li>• Access to education packages in Australian Sign Language (Auslan) for participants in deaf sports</li> <li>• Access to national safeguarding policies, resources and education including the safeguarding continuous improvement program</li> <li>• Access to SIA's base level complaint handling - providing independence from sporting bodies in managing issues of conflict of interest.</li> <li>• Access to current online education platform and services including the Play by the Rules program</li> </ul>	<ul style="list-style-type: none"> <li>• Only core outreach from SIA via limited face to face education sessions, and communications products that are not tailored to the specific needs of at risk cohorts</li> <li>• 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 with no focus on barriers to the participation of at risk cohorts.</li> </ul>
<b>International and Pacific partners</b>	<ul style="list-style-type: none"> <li>• Enable Australia to meet its international obligations through base level grant funding to the Oceania Regional Anti-Doping Organisation (ORADO), UNESCO and to WADA which are required for Australia to compete at international events such as the Olympic and Paralympic Games.</li> <li>• Australian Government is represented at international forums on anti-doping such as UNESCO Convention and Council of Europe matters, the Anti-Doping Convention and Macolin Convention, and acting as the Minister's Registered Deputy on the WADA Executive Committee as required by WADA.</li> </ul>	<ul style="list-style-type: none"> <li>• National and international partnerships are limited to current levels without the ability to build a contemporary view and strategies to address evolving issues in sport.</li> </ul>
<b>Overall assessment and Impact Rating</b>	<p><b>Assessment:</b> This option will adequately address current threats facing the anti-doping and integrity programs through continuation of minimum level capability to continue services that are tied to measures terminating on 30 June 2024. It would ensure ongoing delivery of legislative and international obligations It will also enable continuation of complaint handling, education and capacity building for sports and participants.</p> <p><b>Government Objectives:</b> Met</p> <p><b>Impact Assessment:</b> Slightly beneficial (+1) noting continuation of current programs and WADA compliance without increase in capabilities.</p> <p><b>Headline: This option provides a base level of compliance against the current methodologies and threats as detailed within the identified policy problem.</b></p>	

### Regulatory burden estimate (RBE)

The total annual ongoing cost of maintaining a highly effective integrity and anti-doping regime is represented in Option 4 (High) at approximately \$42 million per annum.

The two solutions available to Sport Integrity Australia to implement a highly effective integrity and anti-doping regime are to implement the [Full Cost Recovery Option](#), or revert the unfunded portion of complaints handling, prevention of serious child safeguarding issues, associated investigations and welfare support and a level of anti-doping activity including testing and education to sports leaving the approximately \$10 million to be funded by individuals, businesses or community organisations should one of the options not be funded. This would be achieved through investment of their own time and resources funded via government grants, business income, or personal income/time.

Sport Integrity Australia's ABC process was used to determine the percentage of activities (at a high level) as a proportion of total agency activity and used to apportion residual regulatory costs per [table 19](#).

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.

Table 19: Regulatory Burden Estimate under Option 2 (Low)

Average annual regulatory costs				
<i>Change in costs (\$ million)</i>	<i>Individuals</i>	<i>COMPPs/Business/ State Government</i>	<i>Non-COMPPs and community sport</i>	<i>Total change in cost (\$m)</i>
<i>Consideration and evaluation of future trends and emerging risks in sport (i.e. new sports, illicit drugs)</i>	-	\$0.02	\$0.00	\$0.02
<i>International engagement</i>	-	\$0.37	\$0.10	\$0.47
<i>End to end Anti-Doping Program (excluding Education)</i>	-	\$4.00	\$1.00	\$5.00
<i>Identify and report on issues, trends and impacts relating to sports wagering and competition manipulation</i>	-	\$0.17	\$0.05	\$0.22
<i>Management of externally focussed sport related programs (i.e. PBTR)</i>	-	\$0.10	-	\$0.10
<i>NSO/NSOD and Athlete engagement, products and services (including education)</i>	\$0.10	\$2.62	\$0.30	\$3.02
<i>Information Co-ordination to combat threats to sport integrity including competition manipulation, doping, safeguarding of children and young people and member protection.</i>	\$0.00	\$0.04	\$0.01	\$0.05
<i>Provide safe and independent service channels for sporting participants (including welfare support, ICHM and confidential reporting)</i>	\$0.05	\$0.88	\$0.17	\$1.10
<i>Provide strategic intelligence to combat threats to sport integrity including competition manipulation, doping, safeguarding of children and young people and member protection.</i>	-	\$0.02	-	\$0.02
<b>Total by sector</b>	<b>\$0.15</b>	<b>\$7.22</b>	<b>\$1.63</b>	<b>\$10.00</b>

### 4.3 Option 3 (Medium)

<b>Segment</b>	<b>Positive impact</b>	<b>Negative impact</b>
<b>Government</b>	<ul style="list-style-type: none"> <li>Continuation of Australia's NADO capability and recognition</li> <li>Retention of a national body to centrally coordinate all sports integrity policy and responses to address anti-doping and sport integrity issues through the continuation of Sport Integrity Australia, 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 integrity matters.</li> <li>Continuation of administer a confidential complaints handling and reporting (whistle-blower) scheme encompassing all sports integrity issues.</li> <li>The opportunity to overcome the silo effect that currently exists where multiple bodies including NSOs, law-enforcement and regulatory agencies are engaged, and where the difficulties in securing a coordinated response are compounded by a federal system with differences in state/territory and federal regulatory and criminal laws<sup>82</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>Anti-Doping and Integrity 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 and not explore the barriers to participation of vulnerable people.</li> </ul>

<sup>82</sup> The Wod Review

	<ul style="list-style-type: none"> <li>• an uplift in operational capability to ensure more efficient targeting of anti-doping and integrity activities, a dedicated tip-off channel, human source capability, banking and industry partnerships to inform targeted action.</li> <li>• Increased intelligence and coordination of information across Government Agencies and Law Enforcement</li> <li>• Provision direct assistance to small and emerging sports in Australia that lack capacity to deal with integrity issues</li> <li>• Australia maintains ability to host major sporting events and participate in international events assured through the expansion of the ASDTL capability and capacity to ensure the laboratory can deliver world's best practice anti-doping testing in line with the annual requirements released by WADA that set out new requirements for laboratories to maintain their accreditation</li> <li>• maintained through expansion of high priority testing capabilities for the ASDTL, engendering international confidence in the integrity of Australian sport and in turn the provision of a WAD Code compliant national anti-doping program.</li> <li>• Continuation of a single, easily identifiable education and outreach platform dedicated to developing and coordinating education, training and outreach resources and programs</li> <li>• Pacific capacity building programs are supported through education and engagement programs to prevent, detect, and deter regional and specific doping threats.</li> <li>• Australia's response to match fixing is effective and requirements of the Macolin Convention are met through maintenance of the ASIU as the central information gathering, analysis and dissemination and coordination capability.</li> </ul>	
<p><b>NSO/NSODs, SSO &amp; sporting clubs</b></p>	<ul style="list-style-type: none"> <li>• Anti-doping and sport integrity issues and supporting policies and activities are coordinated and guided at a National level through the continuation of Sport Integrity Australia</li> <li>• Australia retains its NADO capability and recognition to allow sport to host major events and participate in international competition.</li> <li>• Anti-doping capabilities keep pace with current methodologies through SIAs digital forensic capability, more efficient targeting of anti-doping and integrity activities through an uplift in strategic intelligence and operational capabilities and resources to strengthen understanding of anti-doping and the sport integrity threat environment</li> <li>• Provision of new State Integrity Managers to be embedded within State/Territory departments of sports, National integrity networks and agencies of Community Sport Australia (i.e. Sport NSW, Vicsport, SportWest etc.). This will enable expansion of the National Integrity Capability Enhancement Program.</li> <li>• Basic capabilities maintained to enable the continuation of SIA complaint handling services - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, SIA has managed over 1400 allegation-based integrity matters.</li> <li>• Continued access to current online education platform and services are maintained including the Play by the Rules program and support to the current 4000+ Member Protection Information Officers, which are embedded in community sporting clubs who provide education and upskilling to at community level sport.</li> </ul>	<ul style="list-style-type: none"> <li>• 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 and not explore the barriers to participation of vulnerable people.</li> <li>• Potential conflict regarding priorities and capacity.</li> </ul>
<p><b>Participants and community</b></p>	<ul style="list-style-type: none"> <li>• Participants are assured of the integrity of sport through continuation of SIAs current capabilities and services</li> <li>• Participants have access to SIA's base level complaint handling - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, SIA has managed over 1400 allegation-based integrity matters.</li> </ul>	<ul style="list-style-type: none"> <li>• Only core outreach from SIA via limited face to face education sessions, communications products</li> <li>• Programs and support not informed by adequate levels of contemporary research leading to outdated materials and methods and increased cost of</li> </ul>

	<ul style="list-style-type: none"> <li>Participants, volunteers and coaches have access to current online education platform and services including the Play by the Rules program.</li> </ul>	administration. Research will not extend beyond anti-doping or sports betting
<b>At risk cohorts</b>	<ul style="list-style-type: none"> <li>Access to education packages in Australian Sign Language (Auslan) for participants in deaf sports</li> <li>Access to SIA's base level complaint handling - providing independence from sporting bodies in managing issues of conflict of interest. Demonstrating the need for this service, SIA has managed over 1400 allegation-based integrity matters.</li> <li>Access to current online education platform and services including the Play by the Rules program.</li> <li>Access to an expanded National Integrity Capability Enhancement Program and benefits from new State Integrity Managers.</li> </ul>	<ul style="list-style-type: none"> <li>Only core outreach from SIA via limited face to face education sessions, and communications products that are not tailored to the specific needs of at risk cohorts</li> <li>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 with no focus on barriers to the participation of at risk cohorts.</li> </ul>
<b>International and Pacific partners</b>	<ul style="list-style-type: none"> <li>Increased capability building activity within the Asia and Oceania regions by partnering with INTERPOL, WADA and Drugfree Sport NZ to establish a Global Anti-Doping Intelligence and Investigations Network connecting experts from Anti-Doping Organisations and respective law enforcement agencies and facilitate their work in the fight against doping, PIED trafficking and manufacturing</li> <li>Dedicated support in the Pacific region through capacity building workshops and training on current anti-doping threats and issues and contract resources to build capability and anti-doping compliance with UNESCO.</li> <li>Enable Australia to meet its international obligations through base level grant funding to the Oceania Regional Anti-Doping Organisation (ORADO), UNESCO and to WADA which are required for Australia to compete at international events such as the Olympic and Paralympic Games.</li> <li>Australian Government is represented at international forums on anti-doping such as UNESCO Convention and Council of Europe matters, the Anti-Doping Convention and Macolin Convention, and acting as the Minister's Registered Deputy on the WADA Executive Committee as required by WADA.</li> </ul>	<ul style="list-style-type: none"> <li>Potentially conflicting priorities for partners – be that operational, capacity, funding or political.</li> </ul>
<b>Overall Assessment and Impact Rating</b>	<p><b>Assessment:</b> This option would provide the capabilities critical to ensuring Australia's anti-doping program is fit for purpose and able to provide athletes and sport participants with trust in the system. It will protect the health and welfare of participants in sport of all ages, sports administrators, coaches and officials, sport parents and guardians, while maintaining the integrity and reputation of sport that is a vital building block of thriving and inclusive Australian communities. It will enable SIA to make the right intervention at the right time.</p> <p><b>Government Objectives:</b> Met</p> <p><b>Impact Rating:</b> Moderately beneficial (+2) noting continuation of current programs, WADA compliance, uplift in ASDTL testing capability and additional intelligence and operational capabilities.</p> <p><b>Headline: The identified policy problem is met by this option.</b></p>	

### Regulatory burden estimate (RBE)

The total annual ongoing cost of maintaining a highly effective integrity and anti-doping regime is represented in Option 4 (High) at approximately \$42 million per annum.

The two solutions available to Sport Integrity Australia to implement a highly effective integrity and anti-doping regime are to implement the [Full Cost Recovery Option](#), or revert the unfunded portion of complaints handling, prevention of serious child safeguarding issues, associated investigations and welfare support and a level of anti-doping activity including testing and education to sports leaving the approximately \$3 million to be funded by individuals, businesses or community organisations should one of the options not be funded. This would be achieved through investment of their own time and resources funded via government grants, business income, or personal income/time.

Sport Integrity Australia's ABC process was used to determine the percentage of activities (at a high level) as a proportion of total agency activity and used to apportion residual regulatory costs per [table 20](#).

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.

Table 20: Regulatory Burden Estimate under Option 3 (Medium)

Average annual regulatory costs				
Change in costs (\$ million)	Individuals	COMPPs/Business /State Government	Non-COMPPs and community sport	Total change in cost
Consideration and evaluation of future trends and emerging risks in sport (i.e. new sports, illicit drugs)	-	\$0.01	\$0.00	\$0.01
International engagement	-	\$0.12	\$0.03	\$0.15
End to end Anti-Doping Program (excluding Education)	-	\$1.34	\$0.33	\$1.67
Identify and report on issues, trends and impacts relating to sports wagering and competition manipulation	-	\$0.06	\$0.01	\$0.07
Management of externally focussed sport related programs (i.e. PBTR)	-	\$0.03	-	\$0.03
NSO and Athlete engagement, products and services (including education)	\$0.03	\$0.55	\$0.10	\$0.68
Information Co-ordination to combat threats to sport integrity including competition manipulation, doping, child safeguarding and member protection.	\$0.00	\$0.01	\$0.00	\$0.01
Provide safe and independent service channels for sporting participants (including welfare support, ICHM and confidential reporting)	\$0.02	\$0.30	\$0.05	\$0.37
Provide strategic intelligence to combat threats to sport integrity including competition manipulation, doping, child safeguarding and member protection.	-	\$0.01	-	\$0.01
<b>Total by sector</b>	<b>\$0.05</b>	<b>\$2.53</b>	<b>\$0.52</b>	<b>\$3.00</b>

#### 4.4 Option 4 (High)

Segment	Positive impact	Negative impact
<b>Government</b>	<ul style="list-style-type: none"> <li>Continuation of Australia's NADO capability and recognition.</li> <li>Retention of a national body to centrally coordinate all sports integrity policy and responses to address anti-doping and sport integrity issues through the continuation of Sport Integrity Australia, 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 integrity matters.</li> <li>Dedicated capability to ensure that policy, programs and services are both contemporary and evidence based with particular focus on Women and girls, First Nations and vulnerable people.</li> <li>Increased capacity to administer a confidential complaints handling and reporting scheme encompassing all sports integrity issues.</li> <li>Increased capacity and ability to coordinate communication and campaigns across Government agencies to leverage both economy of scale and holistic messaging.</li> <li>The opportunity to overcome the silo effect that currently exists where multiple bodies including NSOs, law-enforcement and regulatory agencies are engaged, and where the difficulties in securing a coordinated response are compounded by a federal system with differences in state/territory and federal regulatory and criminal laws<sup>83</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>Research potentially provides insight and evidence into areas that have not yet been explored, highlighting new or emerging issues that sport are yet to deal with.</li> </ul>

<sup>83</sup> The Wod Review

	<ul style="list-style-type: none"> <li>• An uplift in operational capability to ensure more efficient targeting of anti-doping and integrity activities, a dedicated tip-off channel, human source capability, banking and industry partnerships to inform targeted action.</li> <li>• Increased intelligence and coordination of information across Government Agencies and Law Enforcement</li> <li>• Provision direct assistance to small and emerging sports in Australia that lack capacity to deal with integrity issues</li> <li>• Australia maintains ability to host major sporting events and participate in international events assured through the expansion of the ASDTL capability and capacity to ensure the laboratory can deliver world's best practice anti-doping testing in line with the annual requirements released by WADA that set out new requirements for laboratories to maintain their accreditation</li> <li>• maintained through expansion of high priority testing capabilities for the ASDTL, engendering international confidence in the integrity of Australian sport and in turn the provision of a WAD Code compliant national anti-doping program.</li> <li>• Continuation of a single, easily identifiable education and outreach platform dedicated to developing and coordinating education, training and outreach resources and programs</li> <li>• Pacific capacity building programs are supported through education and engagement programs to prevent, detect, and deter regional and specific doping threats.</li> <li>• Australia's response to match fixing is effective and requirements of the Macolin Convention are met through maintenance of the ASIU as the central information gathering, analysis and dissemination and coordination capability.</li> </ul>	
<b>NSO/NSODs, SSO &amp; sporting clubs</b>	<ul style="list-style-type: none"> <li>• National and international partnerships and strategies are strengthened to address a range of contemporary integrity issues , encompassing abuse, mistreatment, protection of children, young people and those with increased vulnerabilities, racism, antidoping measures, and competition manipulation across all levels of Australian sport. through establishment of the Sport Integrity Research institute. This will enable policies and capabilities to keep pace with rapidly evolving and sophisticated doping methodologies and other threats to the integrity of sport</li> <li>• Sport is better informed of aware of integrity policies and supporting services is enhanced through communication campaigns in partnership with key partners</li> <li>• Australia retains its NADO capability and recognition to allow sport to host major events and participate in international competition.</li> <li>• Anti-doping capabilities to keep pace with current methodologies current through SIAs digital forensic capability.</li> <li>• More efficient targeting of anti-doping and integrity activities, through an uplift in strategic intelligence and operational capabilities and resources to strengthen our understanding of anti-doping and the sport integrity threat environment</li> <li>• Provision of new State Integrity Managers to be embedded within State/Territory departments of sports, National integrity networks and agencies of Community Sport Australia (i.e. Sport NSW, Vicsport, SportWest etc). This will enable expansion of the National Integrity Capability Enhancement Program.</li> <li>• An increase in complaint handling staff, and their capability, to meet the forecasted growth in the volume, complexity and seriousness of complaints.</li> <li>• Education packages are of value to all sports, not just NSO/NSODs through development and support the role of Member Protection Information Officers through programs and comprehensive evaluation surveys to ensure the effectiveness of the NIF and broader integrity polices through all levels of sport, community perception, and state and club's interpretation</li> <li>• Access to current online education platform and services are maintained including the Play by the Rules program and support to the current 4000+ Member Protection Information Officers, which are embedded in community sporting clubs who provide education and upskilling to at community level sport.</li> </ul>	<ul style="list-style-type: none"> <li>• Research potentially provides insight and evidence into areas that have not yet been explored, highlighting new or emerging issues that sport are yet to deal with.</li> <li>• Potential conflict regarding priorities and capacity.</li> </ul>
<b>Participants and community</b>	<ul style="list-style-type: none"> <li>• Participants are assured of the integrity of sport through continuation of SIA's current capabilities and services – noting these are accessed free of charge.</li> <li>• Participants have increased access to complaint handling services - providing independence from sporting bodies in managing issues of conflict of interest.</li> </ul>	<ul style="list-style-type: none"> <li>• No specific negative impact is identified, however it is noted that clear and dedicated</li> </ul>

	<p>Demonstrating the need for this service, SIA has managed over 1400 allegation-based integrity matters.</p> <ul style="list-style-type: none"> <li>• Participants, coaches, parents/guardians and volunteers are better informed and aware of integrity policies and supporting services through dedicated communication campaigns in partnership with key partners.</li> <li>• Participants, volunteers and coaches have increased access to current online education platform and services including the Play by the Rules program.</li> </ul>	<p>communication and messages is essential to ensure identified impacts are realised at all levels of sport.</p>
<b>At risk cohorts</b>	<ul style="list-style-type: none"> <li>• Access to education packages in Australian Sign Language (Auslan) for participants in deaf sports</li> <li>• Increased access to SIA complaint handling services</li> <li>• The proposed Research Institute would inform both the empowering the voice of women and girls in sport initiative, and the recently announced First Nations skills program. It would also identify the next tranche of integrity focused actions for Sport Integrity Australia and sport to remove such barriers.</li> <li>• 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.</li> <li>• 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, safeguarding of children and young people, competition manipulation and anti-doping.</li> <li>• Increased development and support from Member Protection Information Officers through programs and comprehensive evaluation surveys to ensure the effectiveness of the NIF and broader integrity polices</li> </ul>	<ul style="list-style-type: none"> <li>• No specific negative impact is identified, however it is noted that clear and tailored communication and messaging is essential to ensure identified impacts are realised within at risk cohorts</li> </ul>
<b>International and Pacific partners</b>	<ul style="list-style-type: none"> <li>• Build national and international partnerships and strategies that address a range of contemporary doping and integrity issues through establishment of the Sport Integrity Research institute</li> <li>• Enable Australia to meet its international obligations through base level grant funding to the Oceania Regional Anti-Doping Organisation (ORADO), UNESCO and to WADA which are required for Australia to compete at international events such as the Olympic and Paralympic Games.</li> <li>• Australian Government is represented at international forums on anti-doping such as UNESCO Convention and Council of Europe matters, the Anti-Doping Convention and Macolin Convention, and acting as the Minister's Registered Deputy on the WADA Executive Committee as required by WADA.</li> <li>• Increased capability building activity within the Asia and Oceania regions by partnering with INTERPOL, WADA and Drugfree Sport NZ to establish a Global Anti-Doping Intelligence and Investigations Network connecting experts from Anti-Doping Organisations and respective law enforcement agencies and facilitate their work in the fight against doping, PIED trafficking and manufacturing</li> <li>• dedicated support in the Pacific region through capacity building workshops and training on current anti-doping threats and issues and contract resources to build capability and anti-doping compliance with UNESCO.</li> </ul>	<ul style="list-style-type: none"> <li>• Potentially conflicting priorities for partners – be that operational, capacity, funding or political.</li> </ul>
<b>Overall assessment and Impact Rating</b>	<p><b>Assessment:</b> This option would ensure greater fairness in Australian sport for its participants through the coordination of a national approach to all sport integrity matters through an established, independent and trusted agency. It would also deliver core capabilities to ensure the Green and Gold decade of events is free from the scourge of PIEDs, competition manipulation and other threats to the safety of all those involved. Impact will be across the elite level through to community sport and would future proof sport from growing and emerging doping and integrity threats by investing in strategies informed by evidence-based research, innovation, and stakeholder partnerships.</p> <p><b>Government Objectives:</b> Met and with additional cross government capabilities</p> <p><b>Impact Rating:</b> Largely beneficial (+3) noting continuation of current programs, WADA compliance, uplift in complaint handling capacity, increased engagement and evidence based policy and activities.</p> <p><b>Headline: The identified policy problem is met and controlled by this option.</b></p>	



**Regulatory burden estimate (RBE) table**

The total annual ongoing cost of maintaining a highly effective anti-doping and integrity regime is represented in Option 4 (High) at approximately \$42 million per annum and with Government funding there would be no residual regulatory burden required to be funded by individuals, businesses or community organisations. The full or partial cost recovery options presented in [section 2](#) discuss the regulatory cost on industry.

## 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 anti-doping and 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 the rapidly evolving doping and integrity threats.

The taskforce consulted with a wide range of sports integrity stakeholders within Australia and internationally, received submissions from members of the public directly and via the broader National Sport Plan consultation process, and conducted an extensive literature review. The taskforce conducted an extensive, targeted stakeholder engagement process in the form of face-to-face interviews and conference calls. Similarly to the call for submissions, letters inviting attendance for an interview were sent directly to key stakeholders. Through this process more than 40 stakeholders were consulted.

[Table 21](#) outlines the organisations that either provided submissions to inform the review and/or were consulted in its formulation. Interested parties and subject matter experts consulted have not been individually listed but are detailed within the Wood Review ([List of submissions and consultations](#) pages 21 – 23).

Table 21: Wood Review\_ consultation summary

Sport Sector	Australian Government	State/territory government	Law enforcement	International Organisations
<ul style="list-style-type: none"> <li>• Australian Athletes' Alliance</li> <li>• Australian Paralympic Committee</li> <li>• COMPPS</li> <li>• Commonwealth Games Australia</li> <li>• eSports Mogul</li> <li>• Play by the Rules</li> <li>• AFL</li> <li>• AOC</li> <li>• Basketball Australia</li> <li>• Cricket Australia</li> <li>• FFA</li> <li>• NRL</li> <li>• Rugby Australia</li> <li>• Swimming Australia</li> <li>• Tennis Australia</li> </ul>	<ul style="list-style-type: none"> <li>• Australian Communications and Media Authority</li> <li>• Australian Sports Commission</li> <li>• Department of Social Services</li> </ul>	<ul style="list-style-type: none"> <li>• Queensland Government</li> <li>• Northern Territory Government</li> <li>• Tasmanian Government</li> <li>• Victorian Government</li> <li>• NSW Government</li> </ul>	<ul style="list-style-type: none"> <li>• ACIC</li> <li>• AFP</li> <li>• Queensland Police Service</li> <li>• Tasmania Police</li> <li>• Victoria Police</li> </ul>	<ul style="list-style-type: none"> <li>• Anti-Doping Denmark</li> <li>• Canadian Centre for Ethics in Sport</li> <li>• European Sport Security Association (ESSA) Sport Betting Integrity</li> <li>• iNADO</li> <li>• Japan Anti-Doping Agency</li> <li>• Japan Sports Council</li> <li>• Sport and Recreation New Zealand</li> <li>• Sport Ireland</li> <li>• Sport Resolutions UK</li> <li>• UK Anti-Doping</li> <li>• UK Gambling Commission</li> </ul>

In developing the Government response to the Wood Review - *Safeguarding the Integrity of Sport* - the Government consulted widely with interested parties: sports organisations, particularly the major professional sports, the Australian Olympic Committee, Australian Paralympic Committee and Commonwealth Games Australia; law enforcement; wagering service providers; state and territory governments; and relevant overseas organisations. 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.

For the past three years we have conducted an Annual Stakeholder Survey, collecting feedback from a diverse range of stakeholders, including athletes, national sporting organisations, attendees of our education courses, law enforcement partners, and more.

This year's survey was conducted over three weeks across June and July and generated a total of 2,255 responses, of which 1,788 participants fully completed the survey (noting participants could submit the survey without responding to every question). Full details and outcomes from this engagement are detailed at [table 3](#).

Key groups that helped Sport Integrity Australia form the proposed options are discussed below.

## 5.1 Current Consultation

To directly inform the options proposed, Sport Integrity Australia has developed an Executive led 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.

It is noted that throughout current consultation no areas of major disagreement as to policy, programs or activities were identified.

Once options are considered by government, Sport Integrity Australia will engage directly with identified agencies and departments regarding implementation planning to ensure identified benefits are realised.

### 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 Sport Integrity Australia to strengthen and expand its partnerships and to plan through a range of issues ranging from sophisticated doping to technology and the threat of streaming lower-level sports creating betting markets that operate under the radar. 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, ACIC, 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 to enable an effective and enhanced partnership between Sport Integrity Australia and stakeholders to address doping and 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 attendance to help protect those most vulnerable in sport.

'Brisbane 2032 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.'

Input to options: 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 formulating the 3 options.

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 the reputation of sport in Australia and will not provide a safe environment for everyone to enter and stay in sport.

### National Integrity Managers Network

The NIMs Forum was held in June 2023 for members of Sport Integrity Australia's NIM network with invitations extended to other NSO/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 workshoping some challenges together. The biggest focus this year was on educating members and managing complaints, while participants also discussed difficult issues they have 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 NIF, signed up sports 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.

Input to options: The NIF 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.

Two options were proposed, Sport Integrity to:

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

The second was preferred as there were some concerns raised about Commonwealth employees conducting work for State Governments. Additionally, that 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 – a key element of Option 3.

Feedback from this group demonstrated the positive influence NIMs have had on sport at this level, in particular the embedding of NIF 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 NIF and appropriately addressing integrity managers at the sport level would be high under a status quo model as embedded integrity managers would cease with funding terminating 30 June 2024. 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**

Consultation with Sport Integrity Australia's Athlete Advisory Group (AAG) occurs regularly throughout the year. 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.

At the June 2023 meeting, 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<sup>84</sup>.

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<sup>84</sup> [AAG gives voice to sport integrity matters | Sport Integrity Australia](#)

“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.”

Input to options: The outcomes of consultation with this group demonstrates the need to address the broad range integrity issues threatening the sports ecosystem, which 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 would be detrimental to the reputation of sport in Australia and will not provide a safe environment for everyone to enter and stay in sport.

### **Australian Sports Commission**

Our government sport partners, including the ASC and NST, provided us with an understanding of the sporting landscape. 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/NSODs over the past 6 years for participation activities. Beyond NSO/NSODs’ 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 cannot afford to tackle these issues alone.

The ASC partnered with the AHRC and the COMPPS 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.

Input to options: 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.

### **Feedback from other government partners**

*<PLACEHOLDER: Update as feedback is received through Cabinet Exposure and Coordination processes>*

### **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 procedures 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 is 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.

## **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. 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 government's decision to invest in an expanded remit for Safety in Sport.

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.

Input to options: 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. 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.

## **Forum for Sport CEOs**

Sport Integrity Australia held the first of its new online forum for sport CEOs in November 2023 to explain the Anti-Doping Rule Violations (ADRV) process from beginning to end. Almost 40 sports were represented at the forum which was held to educate sports about the specifics of ADRV, such as who does what at each stage of the process and the role of sport throughout.

Other topics included the notification process, provisional suspensions, and the public disclosure process. The forum was well received by attendees, who were from a range of sports including athletics, swimming, hockey, ice hockey, motorcycling and paddle.

## **International engagement and consultation**

Sport Integrity Australia operates in a global ecosystem as threats do not stop at the border – they are worldwide and increasing. To only operate at a domestic level would potentially result in Australian athletes being disadvantaged and in unknown environments as soon as they travel internationally to compete.

In an operational context, Sport Integrity Australia has productive relationships and collaborations with international partners to effectively address threats to sports integrity and inform capability development and support policy.

This approach is directed through the Sport Integrity Australia International Engagement Strategy (July 2022 – June 2024). The strategy guides and inform our engagement with the international community as we will seek to maintain and capitalise on our positions of influence in existing international fora and committees and work with our partners to identify and implement integrity outcomes with the global community. We identify strategic opportunities and partnerships through which we are able to build international capabilities. We will seek to be recognised internationally for our sports integrity expertise, and to be influential in our contributions to the development of international policy and outcomes. Through the implementation of this Strategy and its supporting engagements, contemporary and global better practice have been considered against each of the options to improve the global response to sports integrity and deliver an innovative and informed anti-doping program.

Figure 20: Key stakeholders



Further engagement and consultation is affected through major international forums, MOUs, symposiums and exchanges/secondments. These are detailed at [Attachment A](#).

In addition to the stakeholders presented at [figure 20](#) and discussed above, Sport Integrity Australia has developed a strategic engagement matrix to identify key partners and stakeholders that will influence decisions around our capabilities and activities, and the relationship to their initiatives. This is presented at [table 22](#).

Table 22: 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
<b>Major events</b>	Office for Sport ASC – WinWell2032+ Strategy, participation strategy AIS/NIN network Inquiry into Australia's preparedness to host the Olympic & Paralympic Games	INTL sporting events (facilitation)	Transnational crime Drug import Money laundering	Pacific Games 2027 ORADA funding (pacific?) PA/AOC support for regional events/athletes/coaches	2032 Olympics & Paralympics 30+ international events in the lead up to 2032 Comm Youth Games 2023	Education Safeguarding Major event security		2032 Games Major event betting monitoring	2032 Games (QLD)
<b>Criminal activity &amp; regulatory</b>	TGA	Drug import Money laundering Gambling	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
<b>Integrity</b>	NST		Offshore gambling & match fixing		Classification (para) Transgender competition	NACC Esports	Interactive gambling Senate Inquiry into online gambling		State child protection agencies
<b>Inclusion &amp; diversity</b>	Disability strategy Women in sport 50:50	Social cohesion NDIS/NDIA - equity & accessibility		<ul style="list-style-type: none"> <li>Ambassador for gender equality</li> <li>Pacific pathways 2032</li> <li>UNESCO</li> <li>Sports Diplomacy 2030</li> <li>TeamUP – pacific Sport partnership program</li> </ul>	Racism	AHRC	Gender equality Women in Sport 50:50 Pacific strategy National Indigenous Australians Agency	Social media – racism	Safety in sport
<b>Safety</b>	<ul style="list-style-type: none"> <li>Concussion in sport</li> <li>Mental health</li> <li>Drug use</li> </ul>		Prevent & respond to child abuse 2030	Child safeguarding Women safety	Child and women's safety (physical and psychological)	National Office for Child Safety		Chief Scient and NMI (DISR) eSafety	

## 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 within each of the options. Further engagement will be required to develop strategies more thoroughly.

There has been significant dialogue between Sport Integrity Australia and sports around anti-doping, the NIF and safeguarding matters. We can always do more to fully engage in understanding the role we play, particularly in anti-doping matters. This includes providing greater awareness on the functions carried out by WADA, the laboratories, Sport Integrity Australia's role and the sporting organisations themselves. Following strict guidelines and a well-defined process are the key to ensuring the World Anti-Doping Code is adhered to, but it can only be effective if each party understands the process, the athlete's rights and their responsibilities.

The recent MYEFO 2023-24 announcement <sup>85</sup>of ongoing funding will enable Sport Integrity Australia to enhance its current engagement, consultation and understanding of the needs of First Nations People and issues facing Women and Girls in Sport. Specially the funding package included the following initiatives:

- the development of the Empowering Women and Girls in Sport program which will have a primary focus on safety and integrity issues facing women and girls
- a new First Nations skills program to deal with disparities in participation and administration
- the establishment of an Advisory Committee to support Sport Integrity Australia's Culture and Safety Advisor Patrick Johnson to address racism in sport.

#### **At risk cohorts**

This cohort will be both consulted and engaged in the development of a number of targeted programs and initiatives . In particular, the government recently announced an increase in funding of more than \$36.3 million dollars to Sport Integrity Australia (from 2023-24 to 2027-28) to tackle abuse, bullying, discrimination and sexual misconduct. The funding will enable the delivery of new initiatives, including –

- the development of the Empowering Women and Girls in Sport program which will have a primary focus on safety and integrity issues facing women and girls;
- a new First Nations skills program to deal with disparities in participation and administration;
- the establishment of an Advisory Committee to support Sport Integrity Australia's Culture and Safety Advisor Patrick Johnson address racism in sport;
- the enhancement of the Safe Sport Hotline and triage referral and reporting service;
- the provision of wellbeing and psychological services for staff, athletes and support personnel; and
- an enhancement of Sport Integrity Australia's existing education services to be gender and culturally sensitive.

It is also noted that the proposed Research Institute would inform both the empowering the voice of women and girls in sport initiative, and the recently announced First Nations skills program. It would also identify the next tranche of integrity focused actions for Sport Integrity Australia and sport to remove such barriers.

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<sup>85</sup> [Australian Government bolsters safeguards in sport \(sportintegrity.gov.au\)](https://www.sportintegrity.gov.au)



# 6. What is the best option from those you have considered and how will it be implemented?

## 6.1 Best option considered

Based on the assessment, option 4 provides benefits to industry stakeholder groups and government regulators; and other stakeholder groups and implements all related recommendations of the Wood Review. Implementing this option and the initiatives and capabilities within it will address all three elements of the problem – the magnitude, the cost of not doing anything and what are our options. This option provides the greatest net benefit to Australian sport and poses no regulatory burden on sport or participants. It would provide a safe and fair 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 option provides funding to fully implement all anti-doping and integrity 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.

It has been formulated based on the support and feedback received from stakeholder groups discussed in the [consolation section](#) of the IA and 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 NIF, 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 NIF at that level and down to grassroots was problematic. It 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 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 cyber or data issue may highlight the need for government regulation, an expanded remit of Sport Integrity Australia, subsequent policy development etc.

Assessment of regulatory burden impacts indicates that:

- Option 2 has a quantifiable reduction in regulatory burden of \$10.0 million.
- Option 3 has a quantifiable reduction in regulatory burden of \$3.0 million.
- Option 4 has a quantifiable reduction in regulatory burden of \$ Nil

Overall, analysis shows that:

- Option 4 has the greatest alignment with key policy principles and provides the greatest net benefit to affected stakeholders. It provides a strong overall combination of changes to reform the measurement framework and maintain it into the future. This option delivers an estimated benefit of \$42 million to stakeholders and is assessed as a cost to government and not an associated regulatory burden.
- While option 4 provides many of the same benefits as option 3, it also has additional unquantifiable regulatory burdens when compared to option 3.
- Option 3 maintains an overall positive impact on stakeholders but has a lesser degree of alignment with the key policy principles, and results in a lower quantifiable regulatory burden (\$3m). Option 2 also has a greatly reduced ability to support innovation over time

[Table 23](#) provides the summary of impact ratings from the more detailed analysis at [Section 4](#). It headlines how each reform option is likely to impact stakeholders, noting that Option 1 has not been considered as detailed at [page 53](#).

[Figure 21](#), as detailed in [Section 4](#), is provided again as a key to Impact Rating summary at [Table 23](#).

Figure 21

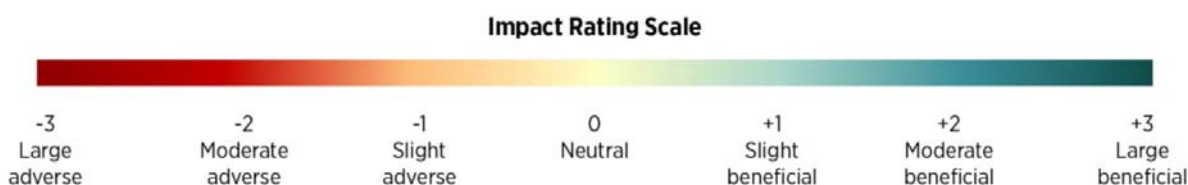


Table 23: Impact Summary

Option	Adverse	Neutral	Beneficial	Explanation
Option 1	-3			Not considered further.
Option 2			+1	Continuation of current programs and WADA compliance without increase in capabilities.
Option 3			+2	Continuation of current programs, WADA compliance, uplift in ASDTL testing capability and additional intelligence and operational capabilities.
Option 4			+3	Continuation of current programs, WADA compliance, uplift in complaint handing capacity, increased communication and evidence based policy and activities.

The overall impacts, costs, and benefits of each of the options informed the recommendation of Option 4. This included consideration of the consultation feedback, as indicated above, and the costs of the options within the context of the number of elements of the problem they address.

## 6.2 How will it be implemented

Implementation will be delivered in two phases:

*Phase 1:* Continuation of all current program, activities and services.

*Phase 2* – Commencement of new initiatives identified for option 4.

The following section titled [implementation plans for new initiatives](#) sets out the following key steps for each individual initiative:

- Purpose
- Timeline
- Responsibility
- Milestones
- Risk management (likelihood, consequence and mitigation)

These key bodies of work be undertaken according to Sport Integrity Australia’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 the following 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. Progress reports will be submitted quarterly, or as set by the Senior Responsible Officer, to the agency Executive for critical decision making and to ensure timeframes, budget and risk are articulated and addressed accordingly.
- Develop working groups, where appropriate, by assigning responsible individuals as project managers and executive sponsors for each activity to delegate work against, integrate related initiatives (better 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.

## 6.3 Implementation Plans for new initiatives

### Enhanced Digital Forensic Capability

**Purpose:** To acquire an enhanced digital forensic capability to future-proof investigative capabilities by ensuring adaptability to new technologies, enhancing data extraction techniques, expediting incident responses, and maintaining compliance with evolving legal and regulatory frameworks and requirements.

**Implementation Timeline:** Project research is underway to determine the most appropriate options.

**Start Date:** In-progress

**End Date:** March/April 2025

**Responsible:** Intelligence and Anti-Doping Investigations section

**Milestones:**

- Needs assessment and Vendor Selection (2-3 months)
- System Design and Customisation (2-3 months)
- Testing and Quality Assurance (2-3 months)
- Training and User Familiarisation including mentoring practices (2 months)
- Rollout into Business as Usual (2 months)
- Evaluation (methodology to be determined) and identify areas for improvement (within 3 months post rollout)

**Likelihood of delay:** Low - research is already underway, however certain factors may contribute to delays including but not limited to unexpected technical complexities during implementation, delays in vendor response and unforeseen challenges through the testing phase.

**Consequence of delay:** Existing measures are in place, but delays may hinder Sport Integrity Australia's ability to keep pace with evolving methodologies and technologies.

Mitigation: Undertake a comprehensive needs assessment, apply the most appropriate solution for the level of work required and concurrently identify potential Commonwealth partners who may be able to provide services through MOU.

### **Joint Operational Taskforce arrangements with Law Enforcement**

Purpose: To establish a joint operational taskforce arrangement in partnership with law enforcement, and key industry partners to disrupt and prevent the supply of PIEDs.

Implementation timeline: Scoping initiatives will start in the first quarter of 2024 to establish a framework, aims, and legal agreements for governing the taskforce.

Start date: First quarter 2024

End date: Last quarter 2026

Responsible: Capability & Development Hub

#### Milestones:

- Needs assessment, coordinated strategy and agreement development (6 months)
- Seek agreement and commitment from core agencies (3 months)
- Development of the framework, policy, procedure (3 months)
- Training and assembly of specialised taskforce (3-5 months)
- Operational implementation - execution of targeted operations leveraging the capabilities of the taskforce, reporting and oversight. (2 months)
- Information sharing and integration of technology (3 months)
- Rollout and integration into testing the system using live cases (3-6 months).
- Evaluation (methodology to be determined) and identify areas for improvement (within 3 months post rollout)

Likelihood of delay: Medium – delays may occur due to factors including interagency processes and potential legal consideration.

Consequence of delay: Existing measures are in place, but delays may hinder Sport Integrity Australia's ability to keep pace with evolving criminal methodologies and may hinder future collaboration opportunities and initiatives.

Mitigation: Though a dedicated project team, regular threat assessments and intelligence updates will ensure the program is flexible and up to date. This would inform contingency plans and prevention programs during delays and enable collaboration with relevant stakeholders to identify emerging trends.

### **Dedicated Pacific Region Support**

Purpose: To build the capability and capacity of Pacific nations to respond to anti-doping and other integrity threats. Looking towards the 2032 Olympic and Paralympic Games, the program will ensure not only that Australian athletes compete on a level playing field with their Pacific counterparts, but that the entire Pacific region is compliant with its WADA and UNESCO obligations, and capable of implementing effective anti-doping programs before and during the Games.

Implementation Timeline: Expected to commence July 2024. Implementation would becoming ongoing, with identified review dates in 2028 and 2032.

Responsible: Head of International Relations, Strategic Policy and Intelligence

Likelihood of Delay: Medium

#### Milestones:

- Needs assessment and development of program framework (July to December 2024)
- Roll out of Pacific support program with an initial focus on critical stakeholder involvement, capability ahead of the 2027 Pacific Games, and compliance ahead of the 2028 Olympic and Paralympic Games (2025-2028)
- Initial assessment/review - post 2027 Pacific Games (Jan 2028)
- Continued roll out of Pacific support program with a focus on capability and compliance ahead of 2032 Olympic and Paralympic Games (2028-2032)
- 2032 Olympic and Paralympic Games held with Pacific support for anti-doping activities – second program assessment (July 2032)

Consequence of Delay: Anti-doping capability in the Pacific remains low, with associated risks (Australian's not competing on a level playing field, Pacific athletes at elevated risk of anti-doping rule violations). Pacific anti-doping compliance

remains low or regresses – with consequences possibly including a country not being able to have their flag flown, their officials attend, or in the worst case, not have their athletes compete at the Olympic Games.

Mitigation: Continue with current support to the Oceania Regional Anti-Doping Agency and encourage their work in the region.

### **Sport Integrity Research Institute**

Purpose: to deepen understanding of sport integrity issues, encompassing abuse, mistreatment, protection of children, young people and those with increased vulnerabilities, racism, antidoping measures, and competition manipulation across all levels of Australian sport. The institute will contribute to Sport Integrity Australia by providing contemporary and evidence based insights to ensure policies, programs and services are fit for purpose.

Implementation Timeline: Expected to commence July 2024, with an implementation start date in July 2025 after which time management and implementation of the Research Institute would move into an ongoing phase

Responsible: Deputy CEO Safety In Sport

Likelihood of Delay: Medium

#### Milestones:

- Needs assessment and development of the institute framework (July 2024- October 2024)
- Seek and evaluate expressions of interest from Universities (November 2024-February 2025)
- Develop Partnership negotiations (February 2024 – June 2024)
- Implementation of the program and launch of Institute (July 2025)

Consequence of Delay: Programs, services and policies may not be in alignment with the realities of the evolving sport environments in Australia and internationally resulting in potentially out of date or not fit for purpose methods or loss of reputation as a leader in sport integrity.

Mitigation: Continue with current practices and processes and look to leverage existing strategies and incoming external research to align with best practice. Develop contingency plans to mitigate any unforeseen issues such as adjusting service timelines. Leverage and foster existing partnerships with universities to inform and to address threats in a co-ordinated and timely manner.

### **Foundational Operational Capability**

Purpose: maintenance of foundational operational capability across anti-doping and integrity complaints to ensure clear, consistent processes and an associated quality assurance framework, as well as appropriate training including mandatory Australian Government Investigations Standards qualifications.

Implementation Timeline: Will be delivered in phases in line with business prioritisation and Executive guidance (as detailed in milestones below).

Start Date: July 2024

End Date: Ongoing

Responsible: Capability Development Hub

Likelihood of Delay: Low/Medium – business prioritisation may lead to some short-term delays

#### Milestones:

- Commence business discovery phase for foundational operational training framework and operational quality assurance framework requirements (July 2024)
- Commence review of operational Standard Operating Procedures (SOPS) (July 2024)
- Commence roll-out of foundational operational training framework and operational quality assurance framework (October 2024)
- Commence updating of SOPs in line with launch of new ICMS (November 2024)

Consequence of Delay: Limited impact on business delivery.

Mitigation: Continue with informal development of capability within agency's existing capability development framework.

## **State Integrity Managers**

Purpose: To embed dedicated Integrity Managers 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: Commencement of an assessment to capture requirements is underway.

Start Date: January 2024.

End Date: Ongoing until transitioned to BAU.

Responsible: Sport Partnerships

Likelihood of Delay: Low

### Milestones:

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

Consequence of Delay: State and territory bodies policy and procedures are not up to date with state and community level athletes and stakeholders are not supported on integrity matters.

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

## **Development and support the role of Member Protection Information Officers through programs and comprehensive evaluation surveys**

Purpose: To ensure the effectiveness of the NIF and broader integrity polices through all levels of sport. It would also ensure Sport Integrity Australia's education packages are of value to all sports, not just NSO/NSODs. It will lead to additional volunteers doing the MPIO role and a wider network of MPIOs around the country supporting community sport participants leading to safer sporting environment

Implementation Timeline: Commencement in the first quarter of 2024.

Start Date: First Quarter 2024.

End Date: Last Quarter 2025

Responsible: Sports Partnerships

Likelihood of Delay: Low

### Milestones:

- Needs assessment and survey development (3 months)
- Seek agreement and identify participants (3 months)
- Implement the survey and ascertain, assess the results (3 months)
- Identify training needs, and develop the training plan (3 months)
- Implement training through face to face or virtual workshops (2 months)
- Evaluation and continuous improvement (6 months)

Consequence of Delay: Content of online and face-to-face training may not be consistent, relevant or contemporary.

Mitigation: Existing training, partnerships and engagement would be maintained to ensure base level support whilst enhanced program and surveys are put in place.

## **Global Anti-Doping Intelligence and Investigations Network– Asia and Oceania**

Purpose: To uplift the capability of Anti-Doping Organisations (ADO) and to build networks between both ADOs and law enforcement to facilitate the fight against doping, PIED trafficking and manufacturing. WADA is seeking to expand this program into the Asia/Oceania region in partnership with INTERPOL, Sport Integrity Australia and Drug Free Sport New Zealand.

Implementation Timeline: In progress, with WADA already partnering with INTERPOL.

Start Date: Mid 2024.

End Date: Mid 2025.

Responsible: Intelligence and Anti-Doping Investigations section

Likelihood of Delay: Medium –project is led by WADA so timeframes will be determined based on their process.

Milestones:

- In principle commitment to assist WADA on the program (from February 24)
- WADA Symposium (proposed announcement of expansion – March 24)
- Completion of Virtual training workshops by ADOs (April 2024 – December 2024)
- Completion of three in-person advanced workshops - likely for one each to be held in the AU/NZ region, Asia Region, Middle East region (January 2025 – August 2025)

Consequence of Delay: Delays may hinder WADAs ability to expend in the Asia/Oceania region.

Mitigation: WADA is seeking sponsorship through multiple bodies to help fund costs. Provide an in-principal commitment to assist WADA with the program within the region, for the virtual training workshops within existing resources, without committing to help facilitate the advanced in-person workshops outside of the AU/NZ region.

## 7. How will you evaluate your chosen option against the success metrics?

Each of the options presented will either maintain or uplift Sport Integrity Australia's capabilities through its current programs to enable its vision of safe and fair sport for all (figure 22). Success would be measured using the 2023–27 Corporate Plan targets and metrics, supported by related key activities and monitored through Sport Integrity Australia's performance framework.

Figure 22 Sport Integrity Australia's 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 will be included in the 2024–25 Health Portfolio Budget Statement 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.

### 7.1 Evaluation plan

Evaluating the effectiveness of the development and implementation of activities is critical. Sport Integrity Australia reviews the performance of its programs and key initiatives on a quarterly basis. This is affected by the completion of performance reports by accountable officers and subsequent review by the Executive. The use of both output and effectiveness performance measures assures ongoing evaluation and the ability for the Executive to intervene as/if appropriate.

In addition to this, a number of the [implementation plans](#) provided within the IA have identified specific evaluation milestones.

The Audit and Risk Committee (ARC) also provides an assurance to effectiveness of the governance and mechanisms in place to manage overall performance and evaluation. The ARC review and provide written advice to the CEO on the appropriateness of our system of risk management and oversight.



**Objectives:** Define clear objectives that align with the organisations corporate plan. This will be achieved through the development of key performance indicators (KPIs) for each activity.

**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 agency activity records, activity-based costing review information, 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 (excluding those mandated through existing legislation) 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 (excluding those considered operationally sensitive) 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.

**At Risk Cohorts – engagement, feedback mechanisms and supporting metrics established through the recently announced Safety in Sport investment and proposed research program for the Research Institute, as outlined in the [Consultation Section](#), will be incorporated into the evaluation process along with any additional performance measures identified.**

## 7.2 Performance measures

<b>Policy objective</b> - Protection of the integrity of Australian sport and the health and welfare of those who participate in sport through the coordination of a national approach to all sports integrity matters.		
<b>Targets</b>	<b>Milestones and deliverables</b>	<b>Metrics and outcomes</b>
To promote positive conduct in Australian sport	SIA is establishing a sport behaviour survey to establish a measurement baseline.	Planned performance result to be set following the establishment of the sport behaviour survey.
	Online course completions and number of attendees at face-to-face education sessions.	104,000 education program completions in 2025-26, increasing to 113,000 education program completions in 2026-27.
To address threats to the integrity of Australian sport.	Develop the Sport Integrity Threat Assessment process and build the capability of our intelligence analysts.	Across 2024-27 Sport Integrity Threat Assessment will be implemented across 10 sports.
	Anti-doping policy requirements are stipulated by WADA and detailed in the Australian National Anti-Doping Policy. Integrity policy requirements are detailed in NIF. The NSO/Ds provide SIA with their policies annually.	Metrics in 2024-27 are 100% of ASC recognised sports' integrity policies are reviewed and benchmarked against best practice standards, and 100% of ASC recognised sports are compliant with anti-doping policy requirements.
	SIA will implement a new operating model which includes an annual operational planning cycle, and an Annual Threats to Sport Integrity Assessment and operations strategy.	Metrics are 20 threat assessments and 5 analytical reports published in 2025-26, and 25 threat assessments 5 analytical reports published in 2026-27.
To protect the health and welfare of participants in Australian sport.	Safeguarding in sport is a rapidly evolving area and the evaluation will provide important information on how to improve practice and future government resourcing decisions.	Metric would be an increased percentage of sports capable of implementing a safe sporting environment for all participants, of all ages, across all levels of sport.

# Attachments

## A - Australian and International requirements and Legislations

Compliance with the World Anti-Doping (WAD) Code and International Standards is mandatory, and Sport Integrity Australia is obligated to perform its functions within the framework set out by the Sport Integrity Australia Act (Act) and Sport Integrity Australia Regulations.

### Current Australian requirements and legislations

Sport Integrity Australia is a non-corporate Commonwealth entity under the Public Governance, Performance and Accountability Act 2013 (PGPA Act) and operates under the Sport Integrity Australia Act 2020 and the Sport Integrity Australia Regulations 2020, including the National Anti-Doping Scheme.

- Sport Integrity Australia Act (Act) – the Act includes:
- National Anti-Doping Scheme (known as the NAD Scheme)
- The Violations list
- The Australian Sports Drug Medical Advisory Committee (known as ASDMA)
- Sport Integrity Australia Advisory Council.

The object of the Act is to establish Sport Integrity Australia to prevent and address threats to sport integrity and to coordinate a national approach to matters relating to sports integrity in Australia, with a view to:

- Achieving fair and honest sporting performances and outcomes
- Promoting positive conduct by athletes, administrators, officials, supporters and other stakeholders, on and off the sporting arena
- Achieving a safe, fair and inclusive sporting environment at all levels
- Enhancing the reputation and standing of sporting contests and of all sport.

The NAD Scheme – the scheme implements the General Anti-Doping Convention and the UNESCO Anti-Doping Convention. The NAD scheme must:

- Contain the anti-doping rules
- Authorise the CEO to test samples provided by athletes
- Authorise the CEO to investigate possible violations of the anti-doping rules
- Contain rules (known as sporting administration body rules) that are applicable to certain circumstances
- Authorise the CEO to give a person a disclosure notice in certain circumstances – a disclosure notice can require a person to attend an interview to answer questions. To give specific information, or to produce specified documents or things. There are consequences for failing to comply with a disclosure notice.
- Comply with certain rights of athletes and support persons. These include notification and review rights.

Violations List – this part of the Act requires the CEO to establish and maintain a list known as the Violations List. If the CEO becomes aware that an athlete or support person has been sanctioned by a sporting administration body in relation to an anti-doping rule violation, the CEO must generally include certain information in the Violation List in relation to the violation. The Violations List is to be made available for public inspection on the internet.

The ASDMAC – has various functions, including providing advice and information to the CEO and sports doping and safety matters, and gives information to sporting administration bodies about individual cases that involve sports doping and safety matters.

The Sport Integrity Australia Advisory Council – functions are to advise the CEO in relation to the CEO's functions or to Sport Integrity Australia's functions and to advise the Minister about the operations of Sport Integrity Australia or the performance of CEO functions. The advice from the Advisory Council must be strategic advice only and not relate to a particular individual or particular investigation.

Current Regulatory Obligations over Industry (NSODs) – Currently the only regulatory obligation relates to Sporting Administration Bodies, which include NSODs and is defined under Section 4 of the Act requiring an Anti-Doping Policy that complies with the WADC, International Standards and the NAD scheme. Therefore, the majority of current activities for NDODs cannot be classified as a cost recovery levy or fee, however, can be classified as a Resource Change under the Charging Framework as it is providing a service.

## International obligations

Sport Integrity Australia fulfils Australia's responsibilities to the Council of Europe Anti-Doping Convention and the United Nations Educational, Scientific and Cultural Organization (UNESCO) International Convention against Doping in Sport, which is a requirement for Australia to compete at international events such as the Olympic and Paralympic Games. As a signatory to the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention), Sport Integrity Australia participates in the global response to combat the threat of competition manipulation on sports in Australia.

Sport Integrity Australia represents Australia at international forums on match-fixing and participate in the Group of Copenhagen Bureau. It participates in working groups, expert groups and continues to develop productive and collaborative relationships with international partners to effectively regulate threats to sports integrity. These relationships include:

- WADA
- the Oceania Regional Anti-Doping Organisation (ORADO)
- the Institute of National Anti-Doping Organisations (iNADO)
- the International Anti-Doping Arrangement (IADA)
- International Partnership Against Corruption in Sport (IPACS)
- United Nations Office on Drugs and Crime (UNODC)
- European Union Agency for Law Enforcement Cooperation (Europol)
- International Criminal Police Organization (INTERPOL)
- The Council of Europe.

Sport Integrity Australia, and its officers, are currently appointed on the below international committees and work groups:

- WADA - serving as the Registered Deputy for Minister Wells on the WADA Executive Committee.
- WADA - secretariat for the OneVoice group of public authorities, a role that contributed to the success of ongoing governance reforms within WADA.
- WADA - the Finance and Administration Committee, affording an opportunity to shape the financial strategy and efficient operation of WADA.
- WADA - the Laboratory expert group, allowing them to contribute to the group's work in managing the accreditation and capability of this important network of laboratories.
- WADA - a member of the Steering Committee, and related working group, for WADA's Anti-Doping Intelligence and Investigation Network.
- WADA - chair of the Therapeutic Use Exemption working group and by delivering the Global Learning Development Framework Education program to upskill other education managers around the world.
- Group of Copenhagen - Deputy Chairperson and Bureau Member of the Group of Copenhagen (Macolin Convention National Platforms Group) contributing directly to the emerging efforts of governments to address competition manipulation.
- International Partnership against Corruption in Sport - a member of the Steering Committee providing Sport Integrity Australia a unique opportunity to influence the emerging focus on sport as an area of serious corruption.

## B - Glossary

<b>Anti-Doping organisation</b>	A World Anti-Doping Code signatory that is responsible for adopting rules for initiating, implementing or enforcing any part of the doping control process. This includes the International Olympic Committee, the International Paralympic Committee, other major event organisations that conduct testing at their events, WADA, international federations and NADOs.
<b>International Standards</b>	Six standards adopted by WADA in support of the World Anti-Doping Code: The Prohibited List, the International Standard for Testing and Investigations, the International Standard for Laboratories, the International Standard for Therapeutic Use Exemptions (TUEs), the International Standard for the Protection of Privacy and Personal Information and the International Standard for Code Compliance by Signatories
<b>National Anti-Doping Organisation</b>	The independent entity (or entities) designated by each country as possessing the primary authority and responsibility to adopt and implement anti-doping rules and direct the collection of samples, management of test results and conduct of hearings
<b>National Integrity Capability Enhancement Program</b>	The National Integrity Capability Enhancement Program is aimed at supporting NSOs and NSODs, recognised by the ASC, to increase their sports integrity capability by embedding the NIF at all levels of their sport.
<b>National Integrity Framework</b>	A set of policies all members of sports need to follow when it comes to their behaviour and conduct in sport.
<b>National Sporting Organisation</b>	The national governing body for the sport they represent in Australia.
<b>National Sporting Organisation for People with Disability</b>	The national governing body for the sport they represent in Australia
<b>World Anti-Doping Code</b>	The document that harmonises regulations regarding anti-doping in sport across all sports and all countries. It provides a framework for anti-doping policies, and rules and regulations for sport organisations and public authorities

## C - Details of NSOs and NSODs

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

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

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

<a href="#">Hockey Australia</a>	Hockey	Funded	National sporting organisation
<a href="#">Ice Hockey Australia</a>	Ice Hockey	Unfunded	National sporting organisation
<a href="#">Ice Skating Australia Inc</a>	Ice Skating	Unfunded	National sporting organisation
<a href="#">Judo Australia</a>	Judo	Funded	National sporting organisation
<a href="#">Kiteboarding</a>	Kiteboarding	Unfunded	National sporting organisation
<a href="#">Kung Fu Wushu Australia Ltd</a>	Kung Fu - Wushu	Unfunded	National sporting organisation
<a href="#">Lacrosse Australia</a>	Lacrosse	Funded	National sporting organisation
<a href="#">Modern Pentathlon Australia</a>	Modern Pentathlon	Funded	National sporting organisation
<a href="#">Motorcycling Australia Ltd</a>	Motorcycling	Funded	National sporting organisation
<a href="#">Motorsport Australia</a>	Motor Sport	Funded	National sporting organisation
<a href="#">Muaythai Australia</a>	Muaythai	Unfunded	National sporting organisation
<a href="#">National Campdraft Council of Australia</a>	Campdraft	Unfunded	National sporting organisation
<a href="#">National Rugby League</a>	Rugby League	Funded	National sporting organisation
<a href="#">Netball Australia</a>	Netball	Funded	National sporting organisation
<a href="#">Olympic Winter Institute of Australia</a>	Ice Racing, Skiing, Snowboarding	Funded	National sporting organisation
<a href="#">Orienteering Australia</a>	Orienteering	Funded	National sporting organisation
<a href="#">Paddle Australia</a>	Canoeing	Funded	National sporting organisation



<a href="#">Paralympics Australia</a>	Goalball, Paralympics, Wheelchair Rugby	Funded	National sporting organisation for people with disability
<a href="#">Petanque Federation Australia</a>	Petanque	Unfunded	National sporting organisation
<a href="#">Polocrosse Association of Australia</a>	Polocrosse	Funded	National sporting organisation
<a href="#">Pony Club Australia Ltd</a>	Equestrian, Pony Clubs	Funded	National sporting organisation
<a href="#">Riding for the Disabled Association of Australia</a>	Equestrian - Disabled	Funded	National sporting organisation for people with disability
<a href="#">Rowing Australia Ltd</a>	Rowing	Funded	National sporting organisation
<a href="#">Rugby Australia</a>	Rugby Union	Funded	National sporting organisation
<a href="#">Shooting Australia</a>	Shooting	Funded	National sporting organisation
<a href="#">Skate Australia Inc</a>	Roller Sports, Skate	Funded	National sporting organisation
<a href="#">Skipping Australia</a>	Skipping	Unfunded	National sporting organisation
<a href="#">Snow Australia</a>	Disabled Wintersport, Skiing, Snowboarding	Funded	National sporting organisation
<a href="#">Softball Australia</a>	Softball	Funded	National sporting organisation
<a href="#">Special Olympics Australia</a>	Intellectual Impairment Sports	Funded	National sporting organisation for people with disability
<a href="#">Sport Climbing Australia</a>	Sport Climbing	Unfunded	National sporting organisation
<a href="#">Sport Inclusion Australia</a>	Intellectual Impairment Sports	Funded	National sporting organisation for people with disability
<a href="#">Squash Australia Ltd</a>	Squash	Funded	National sporting organisation

<a href="#">Surf Life Saving Australia</a>	Surf Life Saving	Funded	National sporting organisation
<a href="#">Surfing Australia</a>	Surfing	Funded	National sporting organisation
<a href="#">Swimming Australia Ltd</a>	Swimming	Funded	National sporting organisation
<a href="#">Table Tennis Australia</a>	Table Tennis	Funded	National sporting organisation
<a href="#">Tennis Australia</a>	Tennis	Funded	National sporting organisation
<a href="#">Tenpin Bowling Australia Ltd</a>	Tenpin Bowling	Funded	National sporting organisation
<a href="#">Touch Football Australia</a>	Touch	Funded	National sporting organisation
<a href="#">Transplant Australia</a>	Transplant	Funded	National sporting organisation for people with disability
<a href="#">Triathlon Australia</a>	Triathlon	Funded	National sporting organisation
<a href="#">UniSport Australia</a>	University Sport	Funded	National sporting organisation
<a href="#">Volleyball Australia</a>	Volleyball	Funded	National sporting organisation
<a href="#">WAKO Australia</a>	Kick Boxing	Unfunded	National sporting organisation
<a href="#">Water Polo Australia Limited</a>	Water Polo	Funded	National sporting organisation
<a href="#">Waterski &amp; Wakeboard Australia</a>	Wakeboard, Water Skiing	Funded	National sporting organisation
<a href="#">Wheelchair Rugby</a>	Wheelchair Rugby	Unfunded	National sporting organisation for people with disability
<a href="#">Wrestling Australia Inc</a>	Wrestling	Funded	National sporting organisation

## D - Decision Process

Date	Decision Maker	Context
29 January 24	Office of Impact Analysis	Informal review (first pass) completed
9 February 2024	Sport Integrity Australia Executive	Review and feedback actioned
15 February 2024	Sport Integrity Australia CEO	Endorsement of IA, signing of Formal First Pass letter and lodgement with OIA for Formal First Pass Assessment
27 February 2024	Office of Impact Analysis	Assessment of First Pass IA
28 February 2024	Sport Integrity Australia Executive	Review of IA incorporating comments and feedback on First Pass from OIA
7 March 2024	Sport Integrity Australia CEO	Endorsement of IA, signing of Second Pass letter and lodgement with OIA for Second Pass Assessment
8 March 2024	Office of Impact Analysis	Assessment of Second Pass IA
13 march 2024	Department of Health Budget Branch	Approved IA provided to support the NPP at Exposure Draft