Australian Government
Australian Sports Anti-Doping Authority

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AUSTRALIAN SPORTS ANTI-DOPING AUTHORITY

Internal Audit of Performance of Sports Education

Final Report

31 August 2018

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Audit Sign-off

Units Audited

Finance and Human Resources

Staff Consulted

Name	Title
Brian McDonald	National Manager, Operations
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	Education Manger
	Education Officer (Education and Online)
	Human Resources Officer
	Education Officer

Timeline

Action	Date
Plan Approved	8 May 2018
Fieldwork Commenced	25 June 2018
Fieldwork Completed	10 August 2018
End of Fieldwork Meeting	15 August 2018
Draft report issued for Management Comments	22 August 2018
Management Comments Received	30 August 2018
Final Report	31 August 2018

Signoff

I acknowledge the findings and recommendations enclosed in this report and undertake to have the agreed actions completed within the identified timeframe:

....
Darren Mullaly, Deputy Chief Executive Officer, Legal, Education and Corporate, ASADA
31...August 2018

....
Mark Harrison, Managing Director, Protiviti
......August 2018

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1 Executive Summary

1.1 Introduction

The Australian Sports Anti-Doping Authority (ASADA) key purpose is to protect the health of athletes and the integrity of Australian sport through activities aimed at minimising the risk of doping. To achieve this purpose, ASADA has developed a range of activities for the Australian sporting community which is documented under four key strategic priorities - Engagement, Deterrence, Detection and Enforcement.

A key activity listed under the Deterrence strategic priority is education. ASADA continues to place significant emphasis on its education and communications program as a key tool in the prevention of doping in sport. It is integral to minimising the risk of doping that ASADA intervene early in an athlete's development and provide relevant and relatable education.

ASADA provides anti-doping education courses to athletes, support personnel and the wider community through both eLearning (online) courses and face-to-face workshops. Of the core courses provided by ASADA:

- 17,561 completed the online Anti-Doping course (Level 1[1]) and (Level 2[2]) in 2016-17 and 17,303 completed for the 2017-18 for the 2017-18 year up to 31 March 2018;
- 2,629 completed the face-to-face workshops in 2016-17 and for 201718 (up to 31 March 2018) there were 1,576 completions.

In 2016-17, ASADA launched new educational resources, including a course about ethical decision-making in sport, school lesson plans, an update to the anti-doping online course and a medical support personnel course. Key priorities of the Education business unit have previously been documented in the *2017-18 Education Plan*. A new Education Plan for 2018-19 is also in draft.

1.2 Overall Audit Conclusions

The objective of this internal audit was to assess and provide advice in connection with ASADA's development, delivery and maintenance of the sports education programs, including maintenance of data associated with education delivery.

Overall, ASADA has made significant improvements to their education program over the past 12 months (including developing new innovative products and ways to engage with and educate the community) which is reflected in the high satisfaction rate by recipients of education courses and engagement with key stakeholders. However, low risk weaknesses have been identified that impact the effectiveness of the education framework in the development, delivery, maintenance and record-keeping of education activities. These weaknesses relate to the limited stakeholder analysis conducted, limited formal identification of lessons learnt, and gaps in management reporting and record keeping processes. However, these weaknesses are known to ASADA and the agency is currently in the process of strengthening procedures and systems, including enhancing data collection procedures, developing new and innovative education activities, improving and clarifying decision-making processes and building a strategic risk analysis, to increase the reach and targeting of the education program and create a lasting impact on participants and the community in line with ASADA's strategy.

1.3 Summary of Findings and Recommendations

The findings and recommendations raised in this review are summarised in the below table. The risk rating associated with the recommendation reflects the assessment of consequence and likelihood of the related risk exposure of the finding using ASADA's Risk Management Matrix and definitions included in **Attachment A**.

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[1] The Level 1 Anti-Doping course provides information on anti-doping rule violations, prohibited substances and methods, supplements, doping control, Therapeutic Use Exemptions and intelligence and investigations.

[2] The Level 2 Anti-Doping course covers more advanced topics in anti-doping and is updated annually to reflect current trends.

Finding	Recommendation	Risk Rating
Finding 1: Weaknesses in stakeholder analysis conducted.	**Recommendation 1:** ASADA should develop an educational strategy that includes consideration of the needs of individual sports. This should include: ▪ assessment of the demographic of participants; ▪ assessment of the prioritisation of stakeholders (to inform resource direction within the Education Team); ▪ assessment of the stakeholder needs of individual sports; and ▪ identification of any additional engagement steps that will be taken with individual sports to appropriately tailor the education program and activities.	Moderate
Finding 2: Limited formal lessons learnt mechanisms in place.	**Recommendation 2:** ASADA should: ▪ Assess where it is appropriate to incorporate required feedback into education tools. ▪ Assess where it is appropriate to capture information on education program from other ASADA touchpoints with stakeholders (such as doping testing). ▪ When developing educational programs for sports, provide regular opportunities (informal or formal) for feedback to be provided by the sport with regards to the educational program developed. This could include arranging formal face-to-face status meetings with the sports' manager, providing the opportunity for the manager to raise any concerns and necessary adjustments that need to be made to the program.	Moderate
Finding 3: Limited record keeping.	**Recommendation 3:** ASADA should: ▪ Implement an electronic data collection system to enable all data collected from educational activities to be accurate and reliable when it comes to reporting performance. This should include leveraging off the LMS where appropriate. ▪ Update and circulate the Record Management Framework and guidance material for staff to adhere to and therefore comply with key legislative requirements.	Moderate
Finding 4: Weaknesses in management reporting and sign-off.	**Recommendation 4:** ASADA should: ▪ Implement a formalised management sign off process for education products, where the implementation of any program requires recorded sign off from management. This should include developing guidelines for staff to follow to ensure they are adhering to formalised process and consideration of where sign-off is required in quality control regimes. ▪ Develop a formal status report for management that is discussed on a regularly basis (i.e. fortnightly or, monthly or quarterly) depending on timeframes of tasks identified in the annual Education Plan that is driven by management needs.	Low

1.4 Overall Management Comment

Management agrees with the commentary in this report.

1.5 Limitation

This report is intended solely for the use by ASADA and should not be distributed to any third party without the consent of Protiviti, which will not be unreasonably withheld.

2 Audit Purpose and Approach

2.1 Background

ASADA's key purpose is to protect the health of athletes and the integrity of Australian sport through activities aimed at minimising the risk of doping. To achieve this purpose, ASADA has developed a range of activities for the Australian sporting community which is documented under four key focus areas - Engagement, Deterrence, Detection and Enforcement.

A key activity listed under the Deterrence strategic priority is education. ASADA provides anti-doping education courses to athletes, support personnel and the wider community through both eLearning (online) courses and face-to-face workshops. Of the core courses provided by ASADA:

- 17,561 completed the online Anti-Doping course (Level 1[3]) and (Level 2[4]) in 2016-17 and 17,303 completed for the 2017-18 for the 2017-18 year up to 31 March 2018;
- 2,629 completed the face-to-face workshops in 2016-17 and for 2017-18 (up to 31 March 2018) there were 1,576 completions.

In 2016-17, 13,391 new users registered for ASADA's online anti-doping education.

In 2016-17, ASADA launched new educational resources, including a course about ethical decision-making in sport, school lesson plans, an update to the anti-doping online course and a medical support personnel course. Key priorities of the Education business unit have previously been documented in the 2017-18 Education Plan. A new Education Plan for 2018-19 is currently in draft.

These anti-doping education courses have achieved an overall satisfaction rating of 89%, with 93% agreeing or strongly agreeing that ASADA's education and information services had minimised the risk of accidental breaches to anti-doping regulations and 95% were satisfied or very satisfied that ASADA's anti-doping programs were easily accessible and provided correct and current information.

In planning for this internal audit, we noted that ASADA is entering a period of significant change as the organisation moves away from the focus areas (engagement, deterrence, detection and enforcement) towards a new structure that focuses on key pillars.

Wood Review

A *Review of Australia's Sports Integrity Arrangements* was commissioned by the Australian Government, which included consideration of ASADA's role in those arrangements. The review panel was requested to:

- Examine the current national and international sports integrity threat environment and foreseeable future challenges.
- Examine the adequacy of Australia's current sports integrity capability against this current environment, with particular attention to:
  - The capability of the Australian Sports Anti-Doping Authority and Australia's sport sector to address contemporary doping threats, including the anti-doping rule violation process, and opportunities for improvement.
- Consider options for structural changes to current sports integrity arrangements, including the merits or otherwise of establishing a dedicated national sports integrity commission or similar entity.

One of the recommendations raised by this review related to anti-doping education and outreach:

The review recommends investment in anti-doping and outreach initiatives through the Australian Sports Anti-Doping Authority (ASADA) in collaboration with the sports sector, particularly targeting those in sub-elite and junior pathways. This is intended to ensure younger athletes benefit from greater protection as they progress to elite level participation.

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[3] The Level 1 Anti-Doping course provides information on anti-doping rule violations, prohibited substances and methods, supplements, doping control, Therapeutic Use Exemptions and intelligence and investigations.

[4] The Level 2 Anti-Doping course covers more advanced topics in anti-doping and is updated annually to reflect current trends.

2.2 Audit Objectives and Scope

Objective

The objective of this internal audit was to assess and provide advice in connection with ASADA's development, delivery and maintenance of the sports education programs, including maintenance of data associated with education delivery.

Scope

The internal audit scope included:

1. Assessing the design effectiveness of the education framework[5] that underpins ASADA's delivery of its education mandate. This included reviewing the roles and responsibilities for the delivery of education and training programs; and

2. Assessing alignment of the operating practices (key processes, activities and controls) in design, management and delivery of education and training programs with the framework and in support of influencing anti-doping behaviour in all athletes. This included assessment of the processes for the development, delivery, maintenance and record-keeping of e-Learning programs, educational resources and face-to-face anti-doping presentations.

The internal audit considered the arrangements in place at the point in time at which the internal audit is undertaken (noting that ASADA is currently revising its education practices).

Scope Limitation

The scope of this internal audit did not:

1. Attend training sessions to assess actual delivery of face-to-face training; or

2. Make any opinions on the impact of the education programs or their outcomes with athletes, support personnel or the wider community; or

3. Include consultations with external stakeholders such as athletes or other recipients of education programs; or

4. Make any assessment of the technical solutions used to deliver on-line education.

The assessments made are being provided in good faith and in the belief that such statements and opinions are not false or misleading. Due to the limited duration of the internal audit, Protiviti has relied on information provided by management. Protiviti does not express an opinion as to whether the information supplied is accurate and no warranty of accuracy or reliability is provided. Furthermore, we are not implying and it should not be construed that we have verified the information provided to us, or that our enquiries could have revealed any matter that a more extensive examination might disclose.

Due to the inherent limitations in any internal control structure, it is possible that errors or irregularities may occur and not be detected. Further, the overall control environment, within which the control procedures reviewed operate, was not reviewed and therefore no opinion as to its overall effectiveness is being expressed.

Please note that this internal audit was not designed to detect all weaknesses in control procedures as it is not performed continuously throughout the period and the tests that were performed were on a sample basis. Any projection of the evaluation of the control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

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[5] For the purpose of this internal audit we defined the framework to be the structures, processes and controls relating to the education and training programs.

3 Positive Practices

In conducting the internal audit, we identified a number of positive practices in ASADA's management of education activities.

3.1 Clearly identified roles and responsibilities

The Education Plan 2017-18 clearly defines each role within the Education Team and their responsibilities for 2017-18. The summary of the planned activities clearly lists all the tasks that need to be completed within 2017-18, including what each task will involve and achieve, who (or what position) is responsible for completing this task and when it must be completed by. This provides a clear level of direction and accountability for the Education Team.

3.2 Satisfaction rate

An educational survey provided by ASADA online (rating system) shows an 85% to 90% satisfaction rate. The feedback identifies that participants are happy with the content provided and understand more about anti-doping after these programs have been administered. This is a positive outcome for the ASADA Education Team.

4 Audit Findings and Recommendations

4.1 Finding 1: Weaknesses in stakeholder analysis conducted

Finding

ASADA conducts limited stakeholder analysis when developing key educational activities, which means there is no clear underpinning understanding of stakeholder education needs to drive educational activities.

Discussion

Behaviour change is the goal of any training curriculum; and to achieve this goal, the recipient needs to want to learn, and be able to learn in a way that resonates with them[6]. Audience analysis helps organisations to determine learning objectives for the curriculum by understanding what participants know and what they still need to learn. Furthermore, the quality of an education activity is built by seeking and acting on feedback from all stakeholders. Accordingly, it is necessary to seek out information and guidance from all parties in order to achieve the desired program quality[7].

At the time of the audit, ASADA had conducted limited stakeholder analysis (audience analysis) to support the development of its educational activities. While we noted there was reference to an Education Curriculum (which identifies key demographics and important areas of learning for the Australian sporting community about anti-doping) as the basis for the development of all education activities, this document was last updated in February 2014 and was driven by the *2015 World Anti-Doping Agency (WADA) Code (article 18)* and *Australian Sports Anti-Doping Authority Act (2006)*. As a result, this information will not be reliable or possibly relevant to the development of current education activities.

Currently, ASADA classifies groups of stakeholders' educational needs based on risk level of the sport, without analysing the demographic and needs of the participants within these sports. This means there is limited tailoring of the education activities to engage with participants and alter their behaviour towards doping. For example, ASADA conducts face-to-face presentations across Australia. This involves a power point presentation developed and presented by casual presenters employed by ASADA. The content of this presentation has remained largely unchanged. Informal feedback has identified that this presentation is not interactive for participants and is viewed more as a compliance exercise for participants as opposed to an effective and engaging educational tool that will work towards changing the participant's behaviour towards doping.

This is a known issue to ASADA and according to stakeholder discussions ASADA is currently working to playing a more active role in understanding a sport's needs by holding informal discussions with sports managers to clearly understand what the sport needs in terms of anti-doping, what education material the sport wants ASADA to develop and timeframes. This will enable the Education Team to develop a more tailored education program that meets the needs and priorities of the sport as well as enable ASADA to become a more effective and engaging educational platform that sports recognise as a meaningful tool to improve the integrity of their sport, rather than a compliance exercise. Audit has also been informed that since completion of fieldwork that plans are underway to conduct a formal stakeholder analysis to inform educational activities in light of the Wood Review, and we encourage this.

Risk Exposure

Limited understanding of the educational needs of the participant may cause ineffective education activities/programs to be developed, resulting in limited behavioural change of participants and therefore inability to reduce doping in Australia.

Likelihood:	Consequence:	Risk Rating:
Unlikely	Major	Moderate

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[6] The Using Training Audience Analysis To Inform Training Design – Corporate eLearning (March, 2018).

[7] The ATEEC Best Practices Guide for Developing Educational Programs: Environmental and Energy Technology (2014).

Recommendation 1

ASADA should develop an educational strategy that includes consideration of the needs of individual sports. This should include:

- assessment of the demographic of participants;
- assessment of the prioritisation of stakeholders (to inform resource direction within the Education Team);
- assessment of the stakeholder needs of individual sports; and
- identification of any additional engagement steps that will be taken with individual sports to appropriately tailor the education program and activities.

Management Comments

Management agrees with and accepts the recommendation. In doing so, ASADA has already made significant improvement in this area. Since mid-July 2018, ASADA has met with 3 high risk sports and participated in education planning within the sport for 2018-2019. This includes collaborating with the stakeholders on education needs and demographics. For example, we have worked with the AFL to identify specific education needs for the relatively new AFLW competition.

Action Officer	Estimated Completion Date
Director Education & Innovation	30 November 2018

4.2   Finding 2: Limited formal lessons learnt mechanisms in place

Finding

There are limited feedback channels/lessons learnt mechanisms in place to capture participants input on the effectiveness of the education activity/tools and where there is an opportunity for improvement. Additionally, ASADA's existing feedback channels do not effectively encourage participants to provide feedback on the education activity.

Discussion

The Australian National Audit Office (ANAO) better practice guide *Public Sector Governance* (2014) stated that evaluation and review enables an entity to identify strengths, learn lessons, and maintain and improve its capacity to service government and the community over time. Accordingly, an evaluation of significant programs conducted over time will enable the determination of whether intended objectives are being achieved and to identify any opportunities for improvement in design and delivery of the programs.

With regard to the Education Plan, ASADA performs an annual review of the plan to determine areas of strength, opportunities for improvement and what the Education Team needs to prioritise for the coming year. This review process enables the Education Team to improve ASADA's approach to education each year. However, there are limited channels to collect external stakeholder feedback and incorporate this into individual education activities. For example, for face-to-face presentations, participants are given a feedback form to fill out, however the completion of the form is not mandatory and as a result there are limited incidences where the presenter collects the feedback forms at the end of sessions. This weakness was also evident in the VR Program, which has not had any formal channel for participant feedback. Instead ad-hoc informal comments were provided at events where the program was demonstrated (e.g. Commonwealth Games 2018). Additionally, there is no formal mechanism to collect feedback from the other touchpoints that ASADA has with stakeholders (such as during testing).

Due to the lack of formal feedback channels, feedback is provided on an ad-hoc basis and is relatively informal. As a result, ASADA is receiving limited participant input on the effectiveness of education activities and tools. While any feedback is valuable, a formalised and more consistent feedback system would be beneficial across all education programs to drive continuous improvement. This would be particularly beneficial for the VR program that is currently undergoing re-development/re-engineering.

Risk Exposure

Limited stakeholder feedback may prevent ASADA from identifying areas for improving their educational activities to suit their audience, resulting in ineffective programs being developed and limiting opportunities for ASADA to change the behaviour towards doping.

Likelihood:	Consequence:	Risk Rating:
Possible	Moderate	Moderate

Recommendation 2

ASADA should:

- Assess where it is appropriate to incorporate required feedback into education tools.
- Assess where it is appropriate to capture information on education program from other ASADA touchpoints with stakeholders (such as doping testing).
- When developing educational programs for sports, provide regular opportunities (informal or formal) for feedback to be provided by the sport with regards to the educational program developed. This could include arranging formal face-to-face status meetings with the sports' manager, providing the opportunity for the manager to raise any concerns and necessary adjustments that need to be made to the program.

Management Comments

Management agrees with and accepts the recommendation. In early August 2018, ASADA delivered the first of its 'new' face-to-face education sessions based on activities based learning rather than traditional powerpoint presentations. In keeping with the drive to be innovative in the education area (the session involved the use of VR technology) feedback was obtained from participants electronically using an interactive ipad on a stand. This method proved very successful and provided ASADA with excellent feedback for the session as athletes were more engaged. Capturing feedback electronically on VR and other areas of education will be ongoing. We will explore other ways of obtaining independent (formal and informal) feedback from stakeholders. ASADA is has also recently obtained formal feedback from WADA on our VR platform and script. The platform received good feedback and WADA has partnered with ASADA to produce a VR education tool for the Youth Olympic Games in October 2018.

Action Officer	Estimated Completion Date
Director Education & Innovation	30 November 2018

4.3 Finding 3: Limited record keeping

Finding

There are gaps in record keeping processes for educational activities, resulting in limited records of key activities and decisions for education activities.

Discussion

Data Collection

According to the Australian Public Service Commission, managing learning and development requires that a learning and development information system (i.e. Learning Management System (LMS)) is in place to collect information required for accurate monitoring by management, reporting and forecasting. This system should have the ability to collate agency-wide development needs for input into your learning and development program, and also deliver accurate baseline data by monitoring and reporting functions to support interpretation and decision-making by managers[8].

Currently, ASADA does have an LMS in place that enables the agency to collect and report on data, but this system is only used for the delivery of ASADA eLearning courses and is yet to be used to support other educational activities. As a result, the same level of data collection is not applied across

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[8] Building Capability – A framework for managing learning and development in the APS (2003)

all education activities. For example, current recording of attendance for face-to-face presentations is unreliable. This is because current practices require presenters to either ask participants to sign-in which participants sometimes forget or the presenter is required to check off who is in attendance, and this is not consistently conducted. As a result, data collected is unreliable and limited. ASADA acknowledges that this is a known issue and are currently looking for ways to rectify this and gain more accurate data. For example, the ASADA CORE App currently being developed has the potential to allow participants to sign in by scanning a unique QR code, enabling the tracking of attendance at face-to-face presentations.

Record Keeping Guidelines

According to an ANAO audit conducted on 'Records Management in the Australian Public Service' in 2012, a key element of sound public administration and accountability is adequate recording or documentation of the business of government. This is achieved by developing records management frameworks and systems designed to ensure that records are appropriately managed, including an agency developing relevant policy and guidance for staff to follow.

ASADA has developed a record management policy that supports key requirements of relevant legislation, however the record management framework to support this policy and staff on how to maintain records and store documentation (i.e. which documents must be stored, how documents should be stored, and where documents need to be stored) has not been updated since December 2015. For the educational activities this has resulted in varying awareness of documentation requirements relating to decisions made, management sign-off and recorded attendance.

Risk Exposure

Lack of consistent data collection practices may cause insufficient and inaccurate data to be collected, resulting in unreliable records, causing operational and reputational damage to ASADA.

Limited awareness of the record management framework and guidance material, may cause staff members to perform non-compliant record keeping practices, resulting in ASADA not complying with key legislative requirements (i.e. Archives Act 1983) and experience reputational damage.

Likelihood:	Consequence:	Risk Rating:
Likely	Minor	Moderate

Recommendation 3

ASADA should:

- Implement an electronic data collection system to enable all data collected from educational activities to be accurate and reliable when it comes to reporting performance. This should include leveraging off the LMS where appropriate.
- Update and circulate the Record Management Framework and guidance material for staff to adhere to and therefore comply with key legislative requirements.

Management Comments

Management agrees with the first part of the recommendation but notes some additional information in relation to the second part of the recommendation.

Part 1 – ASADA agrees and has commenced using electronic data collection at face-to-face education sessions (see earlier management comments). We will examine whether there is a way to better leverage off the data collected on the on-line LMS system.

Part 2 - ASADA has a Records Management Framework that was approved by the National Manager, Legal & Support Services on 1 December 2015. Management acknowledges that the framework could be reviewed and updated in 2018. The Records Management Framework specifically refers staff to a training manual for dealing with record keeping components and using our record keeping system (TRIM) (BDOC15-29306). The training manual referenced has been updated for staff in May 2017. The Manual teaches staff how to catalogue documents across 3 ways, office integration, email integration and desktop integration. The Manual also provides advice on protecting corporate memory and documents that need to be stored in Trim.

Management accepts that refresher training may be needed to remind staff of their obligations under the existing documents.

Action Officer	Estimated Completion Date
Director Education & Innovation and Deputy CEO Legal, Education and Corporate	30 November 2018

4.4 Finding 4: Weaknesses in management reporting and sign-off

Finding

There is currently limited management reporting produced by the Education team. Additionally, there is limited evidence of appropriate management sign-off of education activities.

Discussion

Management Reporting

According to ANAO better practice guide *Public Sector Governance* (2014), early consideration of performance information needs, particularly in relation to program effectiveness, positions an organisation to assess the impact of policy measures, adjust management approaches as required, and provide advice to government on the success, shortcomings and/or future directions of programs. For the Education Team, this has been identified as a weakness as current management reporting processes are ad-hoc and informal.

Currently, ASADA's Education Team produce limited formal management reporting (quarterly annual performance statement reporting) to inform senior management of the progress and effectiveness of educational activities. According to stakeholders, current reporting is conducted informally and, on an ad-hoc basis through status meetings with management. We note that management reporting should be targeted and driven by the needs of management so that it does not become disproportionately burdensome. Accordingly, it is not unusual for management reporting to be streamlined in a smaller team. However, there is still limited formal reporting produced by the Education Team to inform senior management of how it is achieving its goals.

This irregularity of reporting makes it difficult for the Education Team and management to adequately assess the effectiveness of the education activities developed and whether an adjustment to the team's approach is necessary to establish a more engaging anti-doping education platform for the community.

Management Sign-off and Quality Control

Management sign-off of key products is important in managing the quality of products and maintaining accountability within a governance structure.

Within a sample of educational activities selected for this audit we found gaps in the management sign-off on the educational products/activities. Based on stakeholder discussions and documentation reviewed, the Education Team have on occasion concluded that 'no reply' from management means that management approves and signs off on the education material provided. For example, management were given the VR script to sign off on and when there was a delay in obtaining the approval the education team assumed that no response meant that it was approved and ready to be finalised. This is not an appropriate assumption to make. Additionally, when the Education Team was seeking approval for the face-to-face presentation content for Triathlon Australia, there was no documented approval (although we were informed verbal approval was provided).

A current limitation in the process for producing educational products is that it is not clearly identified where sign-off is appropriate below the national manager level. Whereas, it is appropriate for there to be roles and responsibilities for production of material that is aligned with risk. These issues identified are known to ASADA and management are currently reviewing where decision making should lie within the organisational structure of ASADA to provide more clarity to staff and enable the sign-off and reporting process to be more efficient and effective.

Based on sample testing conducted, quality control was performed appropriately for the individual development of education activities. For example, for the VR program, testing was conduct to check the program was working effectively before it was launched at the Commonwealth Games 2018. Also, for the eLearning course, feedback on the draft content was provided by multiple stakeholders, including the Director of Program Delivery, Science and Results Manager, Education Manager and Acting Director of Intelligence. This checked that the content was accurate, relevant and reliable for participants to engage with. However, we note the quality control processes, including management sign-off, are not formalised and documented for staff to follow.

Risk Exposure

Insufficient communication of performance to management may prevent ASADA from managing and assessing performance on an on-going basis, which may prevent issues from being identified and therefore the inability to alter the approach to the education plan/activities. This may result in ineffective educational activities/programs to continue to be developed or remain publicly available, reducing the ability of ASADA to change participants behaviour towards doping.

Lack of management sign-off may result in poor quality educational products, reducing the ability of ASADA to change participants' behaviour towards doping.

Likelihood:	Consequence:	Risk Rating:
Possible	Minor	Low

Recommendation 4

ASADA should:

- Implement a formalised management sign off process for education products, where the implementation of any program requires recorded sign off from management. This should include developing guidelines for staff to follow to ensure they are adhering to formalised process and consideration of where sign-off is required in quality control regimes.
- Develop a formal status report for management that is discussed on a regularly basis (i.e. fortnightly or monthly) depending on timeframes of tasks identified in the annual Education Plan that is driven by management needs.

Management Comments

Management agrees with and accepts the recommendation. For formal status reports (as opposed to informal reports provided currently at weekly meetings with the executive) we believe a monthly report would be preferable.

Action Officer	Estimated Completion Date
Director Education & Innovation	31 October 2018

5 Observations

5.1 International collaborations

Through stakeholder discussions, it was recognised that international collaboration has become a priority for ASADA. This is also reflected in the goals in the Corporate Plan. It is understandable that ASADA wants to support and share necessary information to countries that have limited awareness of doping. However, we note that in an environment of finite educational resources there should be formal assessment of the prioritisation of domestic education over international education, to manage the appropriate investment of resources.

5.2 Alignment between the Education Plan 2017-18 and current organisational risks and priorities

Based off current organisational priorities and risks (stipulated in the 2017-21 Corporate Plan), the Education Plan 2017-18 clearly aligns and works towards meeting these priorities and mitigating relevant risks. However, we note this is a period of significant change as ASADA moves away from the focus areas (engagement, deterrence, detection and enforcement) towards a new structure that focuses on key pillars. Additionally, there has been significant turnover in senior management. Accordingly, we note it is important for the Education strategy to remain agile to be best positioned to achieve the ASADA strategy.

5.3 Escalation procedures

There are no formal escalation procedures in place and instead these processes are performed informally on a case-by-case basis. In order for staff to understand the hierarchy of decisions and what issues need to be escalated, ASADA should consider developing guidance material for staff to follow which identifies the criteria for escalation. This will allow appropriate processes to be followed and also allow staff to escalate issues to the appropriate senior managers when required. While we did not identify any instances where issues had not been appropriately escalated within the sample reviewed, we note the weaknesses in the escalation framework has been identified in the previous *Internal Audit of Issue Identification, Communication and Escalation.*

Attachment A – ASADA's Risk Measurement Matrix

Likelihood

The following table represents ASADA's measurement scale for determining the level of likelihood.

Rating	Description
Almost Certain (5)	The event will occur during the planning period based on current knowledge.
Likely (4)	The event will probably occur during the planning period.
Possible (3)	The event may occur within the foreseeable future or medium term.
Unlikely (2)	The event may occur at some time but is not likely to occur in the foreseeable future.
Rare (1)	The event will occur in exceptional circumstances or as a result of a combination of unusual events.

Consequence

The outcomes of a risk event or situation can be expressed qualitatively or quantitatively (e.g. as being a loss, injury, disadvantage or gain).

Consequence ratings range from marginal to extreme, and are considered in terms of financial, service continuity and performance, regulatory/legal, reputation & image, health & safety, and human resources. Consequences are considered as more than just financial as often a risk event may not result in a financial loss but impact other intangible assets or objectives (e.g. reputation & image, health & safety etc.).

The following questions may be considered when assessing the consequence of a risk event.

- Who will be affected by the risk event?
- Is the event fixable?
- Is the event systemic or isolated?

The table overleaf describes consequence measures employed at ASADA.

Rating	Financial	Service Continuity and Performance	Regulatory and Legal	Reputation	Health and Safety	Human Resources
Extreme (5)	Financial impact in excess of $2M	Major issue which adversely impacts on service delivery for more than 1 month	Significant legal, regulatory or internal policy failure e.g. severe sanction received	Direct Ministerial response required Ongoing negative national and/or international media exposure Community outrage Extensive ongoing publicised attention from numerous or significant key stakeholders	Loss of life or permanent incapacitation of staff, agents or public	Unplanned loss (or extended absence) of an Executive Management member, or several key staff in combination
Major (4)	Financial impact between $1M and $2M	Major issue (e.g. across multiple services) which adversely impacts on service delivery for more than two weeks but less than 1 month	Major legal, regulatory or internal policy failure e.g. major sanction received	Direct departmental response required Extensive negative ongoing state media exposure High profile community concerns raised Repeated ongoing publicised attention from numerous or significant key stakeholders	Serious injury or incident which requires hospitalisation; incomplete rehabilitation achieved	Unexpected loss (or extended absence) of an Executive Management member or key staff member with specialist knowledge without which the business is significantly affected
Moderate (3)	Financial impact between $500k and $1M	Service delivery issue impacting two weeks to one month Some reduction in service performance	Limited legal, regulatory and internal policy failure e.g. sanction received	Ministerial and departmental communication Isolated negative state media exposure Community concerns/complaints require rectification Attention from a limited number of key stakeholders with restricted publicity	injury or incident requiring medical attention with full rehabilitation achieved	Unexpected loss (or extended absences) of a key staff member who Is integral to the business with specialist knowledge
Minor (2)	Financial impact between $250k and $500k	Service delivery issue impacting less than two weeks	Minor legal, regulatory or internal policy failure e.g. minor sanction received	Local negative media exposure Isolated attention from one key stakeholder or a number of minor stakeholders with little or no publicity	Minor injury or incident which requires medical treatment and loss time greater than one week	Unexpected loss (or extended absence) of a senior staff member

Rating	Financial	Service Continuity and Performance	Regulatory and Legal	Reputation	Health and Safety	Human Resources
Marginal (1)	Financial impact up to $250k	No service delivery issue	Insignificant legal, regulatory or internal policy failure. No sanction imposed	No media exposure Isolated attention from a minor stakeholder with no publicity	Minor incident requiring medical attention	Unexpected loss (or extended absence) of a single staff member

Level of Risk

The outcomes of a risk event or situation can be expressed qualitatively or quantitatively (e.g. as being a loss, injury, disadvantage or gain).

Consequence	Rare (1)	Unlikely (2)	Possible (3)	Likely (4)	Almost Certain (5)
Extreme (5)	Significant	Significant	Significant	High	High
Major (4)	Low	Moderate	Significant	High	High
Moderate (3)	Low	Low	Moderate	Significant	Significant
Minor (2)	Low	Low	Low	Moderate	Significant
Marginal (1)	Low	Low	Low	Low	Moderate

Likelihood

Risk Evaluation

Risk evaluation assesses the current (residual) level of risk and compares it to an acceptable level of risk. The level of risk that is acceptable at ASADA is a level of "Moderate". Any risks that are rated at higher than moderate requires implementation of additional controls to reduce either the consequence or likelihood to a level that results in a risk level of moderate or below.

This influences the action required in connection with each of the above risk levels:

	High Risk: Material and profound risk to ASADA achieving its objectives. Additional management is required
	Significant Risk: Material risk to ASADA achieving its objectives. Additional management is required.
	Moderate Risk: Risk to ASADA achieving its objectives which is managed to an acceptable level. Responsibility must be assigned and monitoring undertaken to ensure control strategies remain effective.
	Low Risk: Risk to ASADA achieving its objectives which is managed to an acceptable level. No specific action required in connection with this risk.

Attachment B – Audit Methodology and Assessments

The internal audit included the following approach and assessment:

Scope item	Approach

Assessing the design effectiveness of the education framework to assist ASADA to deliver its mandate. This will include reviewing the roles and responsibilities for the delivery of education and training programs	▪ Consult with key stakeholders within the relevant areas of ASADA to determine current processes, guidance materials and tools for the identification and subsequent delivery of education and training;
	
	 ▪ Review the current Education Strategy in line with relevant better practice[9], to assess:
	   - Whether ASADA adopts a strategic approach to education management, including how ASADA utilises partnerships, community relationships and systems;
	   - Planned prioritisation of the education activities aligns with broader organisational risks and priorities;
	   - The planned format, content and audience for education activity is supported by appropriate stakeholder analysis;
	   - The delineation of roles and responsibilities, appropriateness of decision-making regarding training products, and the adequacy of management arrangements including quality control and extent of senior management oversight;
	   - There are appropriate record keeping systems in place in line with ASADA record keeping policies; and
	   - There is a mechanism for capturing feedback and incorporating lessons learnt.
	   - There are effective mechanisms to measure impact of education activities.
	
	 ▪ Review the draft *2018-19 Education Plan* being developed to assess whether it addresses any current gaps in the *2017-18 Education Plan* and aligns with broader organisational strategy;
	
	 ▪ Identify gaps or areas for improvement in the design of ASADA's framework that supports e-Learning, resource management and anti-doping presentations. This will include areas for improvement in the new *2018-19 Education Plan*.

Assessing alignment of the management and delivery of education and training programs with the framework. This will include assessment of the processes for the development, delivery, maintenance and record-keeping of e-Learning programs, educational resources and face-to-face anti-doping presentations	▪ Select a sample of three educational activities, in consultation with management. The sample will be selected to provide coverage of education activities under the *2017-18 Education Plan*.
	
	 ▪ We will review the management and delivery of the sample of education activities to assess whether:
	   - The planning and delivery of the education activity aligns with the overarching *2017-18 Education Plan*;
	   - There is appropriate management sign-off relating to delivery of the education activity;
	   - There are quality control arrangements in place for material used for the education activity;
	   - There is sufficient and targeted management reporting and oversight over the education activity, including timely escalation and resolution of issues;
	   - Record keeping for the education activity is in line with ASADA record keeping policies. This will include assessing that all records maintained for the activities are complete, up-to-date and accurate; and
	   - Lessons learnt mechanisms are utilised to incorporate both internal and external feedback sources.
	
	 ▪ From our review of the sample, we will identify areas to improve the management and delivery of the education and training programs.

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[9] Including from the Australian Public Service Commission.