



SPORT INTEGRITY
AUSTRALIA

STATEMENT OF COMPLIANCE

WITH THE COMMONWEALTH
CHILD SAFE FRAMEWORK

October 2024



About Sport Integrity Australia

We were established 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:

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

We coordinate elements of the national sports integrity threat response including prevention, monitoring 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, providing a comprehensive anti-doping program for the Australian sporting community and administering the National Integrity Framework 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).



Commitment to the Safety of Children and Young People

We are committed to the safety and wellbeing of children and young people. One of our key operational functions is to develop strategies to protect the wellbeing of children and young people in sport and our commitment to this cause is reflected in the way we conduct our business as an organisation. We ensure all staff are aware of the National Principles for Child Safe Organisations and the Commonwealth Child Safe Framework (the Framework), to ensure child safety and wellbeing is acknowledged and understood throughout all our work, at all levels of the agency.

Interaction with children and young people

Our role is to provide advice and assistance to counter the:

- use of prohibited substances and methods in sport
- abuse of children and young people and other persons in a sporting environment
- manipulation of sporting competitions
- failure to protect members of sporting organisations and other persons in a sporting environment from bullying, intimidation, discrimination, or harassment.

Some staff have contact with children when undertaking their roles to fulfil these functions.

In addition, we have a dual responsibility regarding child safety:

- to ensure internal policies and processes are child safe when delivering our programs and services to children
- to provide advice and support to the sport sector in relation to providing a child safe sporting environment.

Compliance with the Framework

Implementation of the Framework remains a priority for the agency, and we remain compliant with each of its 4 requirements. The following is a summary of activities undertaken in or prior to 2024 to improve compliance with the Framework.

REQUIREMENT ONE

1

Undertake risk assessments annually in relation to activities of the entity, to identify the level of responsibility for, and contact with, children, evaluate risks to child safety and put in place appropriate strategies to manage identified risks.

As an agency responsible for the safety and wellbeing of children and young people when interacting with our programs and services, we are committed to continually re-evaluating these interactions, consulting with our safeguarding experts and ensuring our child safe risk assessment remains contemporary and relevant.

We conducted an annual review of our Child Safe Risk Assessment in 2024 to:

- identify our interactions with children and young people across the agency, ensure risk events remain appropriate, and perform a stock-take of our child related work
- ensure likelihood, consequence and risk ratings remain appropriate
- ensure controls are current, specific, relevant and to gain a better understanding of how we may be able to measure control effectiveness.

We also identified an additional risk event regarding child safe obligations of funded third parties. This risk event has now been added to our risk assessment, ensuring the use of child safe third-party clauses in procurement activities.

Through our risk assessment we identified a residual risk rating of HIGH. We also ascertained that certain risk events associated with our standard business operations have the potential, if not mitigated, to cause significant danger or harm to children.

These risk events have the potential to occur during:

- the testing of all athletes, including children under our Anti-Doping Testing Plan. This relates to the sensitive nature of the anti-doping testing process, with children being partially undressed in a closed environment to provide testing samples
- the management of potential or suspected Anti-Doping Rule Violations by a child, which may involve conducting investigations and interviews
- the management of abuse-related complaints involving children
- the delivery of face-to-face and online education to children
- the delivery of face-to-face and online education to athletes and members of sporting organisations in relation to child safeguarding
- the management of sensitive, personal information relating to children
- the direct engagement of (or general encounters with) children through internal agency events and external commitments and outreach.



Actions and controls to mitigate these risks include:

- all staff, other than chaperones, requiring baseline security clearances
- all staff requiring Working with Children Check (WWCC)/Working with Vulnerable People (WWVP) cards
 - all anti-doping staff ID cards expiry dates issued in alignment with WWCC/WWVP expiry dates
- mandatory new starter and refresher training on relevant topics including Commonwealth Child Safe Framework, Security Awareness and Privacy
- anti-doping staff inductions outline the process for testing children and young people and the extra steps required as prescribed in the World Anti-Doping Code – International Standard – Testing and Investigations 2023 (ISTI)
 - anti-doping staff are also required to undertake an annual exam which includes questions on compliance with the procedures for children and young people
- investigations guided by internal Investigations Manual which incorporates processes specifically related to dealing with vulnerable persons
 - investigations are conducted in accordance with the ISTI and the Australian Government Investigations Standards 2022 (AGIS)
- Section 5.0 of the World Anti-Doping Agency (WADA) Implementing Education Programs ensures all education content, material and delivery is appropriate for the relevant age groups
- our Safeguarding team are safeguarding specialists with oversight of, and input into, all child related education resources and content which is critical to ensuring the appropriateness of material.

We acknowledge that our child safe risk assessment is a live and ever-changing body of work and we recognise that further reviews of the risk assessment are essential to maintaining relevance with the ever-changing environment that we operate in.



REQUIREMENT TWO

2

Establish and maintain a system of training and compliance, to make staff aware of and compliant with the Framework and relevant legislation, including Working with Children Checks/Working with Vulnerable People Checks and mandatory reporting requirements.

- We maintain clear and well-communicated policies that meet the requirements of the Framework and manage additional child-related risks specific to the agency.
- We continue to promote a system of compliance and ensure all staff comply with child safe working requirements. We apply robust staff screening processes to check the suitability of all staff who will work with children, including a requirement for them to obtain a WWCC/WWVP card.
- We ensure all third-party contractors are screened and vetted as part of our contractual engagements, including adherence to child safety requirements. Third party contracting staff who have contact with children are also required to have a valid and current WWCC/WWVP card.
- We continue to provide training to staff about their obligations under the Framework and internal child safety policies.
- All new staff must complete the mandatory Commonwealth Child Safe Framework eLearning course.

REQUIREMENT THREE

3

Adopt and implement the National Principles for Child Safe Organisations.

- We continue to adopt and implement all the National Principles.
- We reviewed and re-published our Child Safe Policy (the Policy) in August 2023 in line with National Principles for Child Safe Organisations. Edits to the policy included the acknowledgement of 'routine' or 'unplanned' interactions with children and a requirement for staff to record and inform their manager when they have been in a one-to-one situation with children. We completed the 2023 periodic review of the Policy with the next review scheduled for August 2025.
- As a Child Safe Organisation and an agency committed to continuous improvement, we continue to consider ways to better track and embed all National Principles.



REQUIREMENT FOUR



Publish an annual statement of compliance with the Framework including an overview of the entity's child safety risk assessment (conducted under Requirement One).

We publish our Statement of Compliance in October each year.

Future child safety initiatives

We are committed to continually ensuring the safety and wellbeing of children and young people. Over the next 12 months, we will work towards:

- Taking a strengths-based approach to building the capability of sports to embed child safe practices in sport through:
 - **Education:** we are committed to building the safeguarding knowledge, awareness and practices of athletes, parents, coaches/officials and sports personnel through education in a variety of mediums, including face-to-face, webinars, resources, and e-learning. This work helps build a more educated sport community so child safe principles and practices are embedded in and through all levels of sports.
 - **Resources:** we have developed and continue to build a suite of resources to aid in building the capability of sporting organisations in meeting the National Child Safe Principles and ensure the human rights of the child are upheld and considered by sport. Easily understood and accessible resources are being developed for parents, carers and children and young people to be aware of their rights and responsibilities for safer sport for all.
 - **Applying the National Child Safe Principles:** we conduct the Safeguarding in Sport Continuous Improvement Program (SISCIP) which is designed to build the capability of sporting organisations to provide safe environments for children, young people, and all members. The SISCIP, underpinned by the National Principles for Child Safe Organisations, assists sporting organisations to implement the principles and strengthen their safeguarding capability through resources, education, training, and ongoing support.
- Building the voice of children and young people into our policy design and complementing resources by conducting research into children and young people's perceptions of safety in sport.

- Children and Young People – a child's rights approach to urine analysis
 - this research project seeks to identify and address the inherent risks children and young people are exposed to as a result of the current anti-doping urine analysis testing process
 - » the project will raise awareness of the limitations of the current process to protect the human rights of the child and provide recommendations on alternate procedures to support the rights of the child throughout the testing process for minors.
- We are working with experts to develop appropriate support and education for Children and Young People about performance and image enhancing drugs and disordered eating in sport.
- The Youth Athlete Advisory Group will be implemented in 2025. The Group will be consulted and engaged in co-design initiatives on matters related to youth athletes e.g. policy, education programs and resources developed by Sport Integrity Australia.

Further considerations

We will continue to lead by example to meet compliance, implement best practice and embed a culture of child safety to demonstrate the ongoing priority and commitment of the agency in the safety and wellbeing of children.

We have zero tolerance for child abuse and neglect in any form. We support the rights of children and also support children and young people having a voice in the policies and programs that affect them. They have the right to take part in sport in a safe, positive and enjoyable environment, where they are respected and valued.

Child safety and protection remains a core priority for Sport Integrity Australia now and into the future.