



**SUBMISSION TO THE
JOINT COMMITTEE OF PUBLIC ACCOUNTS AND AUDIT (JCPAA)**

**INQUIRY INTO THE EFFECTIVENESS OF
AUSTRALIA'S NATIONAL ANTI-DOPING SCHEME**

AUDITOR-GENERAL REPORT NO. 27 OF 2024–25

Date: 14 October 2025



1. EXECUTIVE SUMMARY

Curling Australia welcomes the opportunity to provide this submission to the Joint Committee of Public Accounts and Audit (JCPAA) in response to Auditor-General Report No. 27 of 2024–25: Sport Integrity Australia's Management of the National Anti-Doping Scheme (NADS). We commend the Committee's attention to the evolving challenges in ensuring integrity and fairness in Australian sport.

As the recognised National Sporting Organisation (NSO) for curling, Curling Australia fully supports the objectives of the National Anti-Doping Scheme and the work of Sport Integrity Australia (SIA). Our submission highlights the practical realities of implementing anti-doping and integrity measures within a small, volunteer-driven sport. We provide recommendations to strengthen proportionality, accessibility, and sustainability of compliance across all sports, regardless of size or funding.

We thank the Committee for the opportunity to contribute and would welcome the chance to appear before the JCPAA to provide further evidence or insight into the unique challenges faced by smaller National Sporting Organisations under the current integrity system.

2. BACKGROUND AND CONTEXT

Sport Integrity Australia (SIA) was established in July 2020 as the national agency responsible for safeguarding the integrity of Australian sport. Under the Sport Integrity Australia Act 2020, SIA administers the National Anti-Doping Scheme (NADS), which gives effect to Australia's obligations under the UNESCO International Convention Against Doping in Sport and the World Anti-Doping Code.

The Auditor-General Report No. 27 (2024–25) assessed the effectiveness of SIA's management of the NADS between 2021 and 2024. The audit concluded that SIA's administration was only 'partly effective', noting that while government-funded sports benefited from risk-based testing and strong education programs, the 'user pays' model applied to many professional and emerging sports compromised consistency, independence, and proportionality.

The audit identified deficiencies in SIA's governance, risk management, and investigative processes, including inadequate conflict-of-interest controls, outdated risk frameworks, and insufficient performance measures. Importantly, these structural gaps disproportionately impact smaller sports that rely on volunteers and limited funding, such as Curling Australia.

3. CURLING AUSTRALIA'S EXPERIENCE UNDER NADS

Curling Australia operates with a small volunteer board and limited paid staff, yet we are subject to the same compliance requirements as larger, professional NSOs. Our athletes are geographically dispersed across Australia and often compete internationally, requiring a high standard of education and compliance with the National Integrity Framework (NIF) and the Complaints, Disputes and Discipline Policy (CDDP).

Since adopting the NIF, Curling Australia has observed the following challenges:

- The administrative, educational and financial burden of maintaining anti-doping compliance is disproportionate to the sport's size.
- Volunteer administrators are increasingly required to interpret and apply complex integrity frameworks without consistent SIA guidance.
- The transition from the CDDP centralised system to a decentralised and sport-administered system has created uncertainty and inconsistencies in the delivery of SIA compliance. At the same time, resource constraints limit our ability to proactively educate athletes and officials.

Despite these challenges, Curling Australia continues to prioritise integrity and athlete welfare, leveraging partnerships with the Australian Olympic Committee and Sport Integrity Australia to deliver education and uphold compliance standards.

4. KEY ISSUES AND RECOMMENDATIONS

4.1 Governance and Proportionality

The Auditor-General's report highlights a governance model that assumes uniform capacity across all NSOs. For smaller sports, compliance with the NADS is disproportionately resource intensive. A one-size-fits-all model places small NSOs at risk of inadvertent non-compliance.

Recommendation: Develop a scalable integrity compliance framework that calibrates requirements according to an NSO's size, structure, funding, and risk profile.

4.2 Education and Communication

While SIA's e-learning modules are effective, they often lack relevance for smaller, geographically dispersed sports. Curling athletes frequently engage in self-funded training and competitions, making consistent engagement with education content difficult.

Recommendation: Expand targeted education programs for smaller sports, including direct athlete briefings before international competition and simplified materials tailored to volunteer-based NSOs.

4.3 Resourcing

The current model places financial responsibility for anti-doping education and compliance on sports with minimal funding, creating inequity across the system. This disadvantages smaller NSOs and limits the ability to maintain consistent deterrence and compliance.

Recommendation: Introduce a funding mechanism or subsidy framework to ensure equitable access to compliance and education resources for all NSOs.

4.4 Guidance and Support

Small NSOs often lack the internal legal and policy capacity to interpret complex integrity obligations. The absence of tailored advisory support leads to inconsistent implementation and elevated risk exposure.



Recommendation: Establish a dedicated small-sport advisory and support unit within SIA to provide practical compliance guidance, templates, and training for volunteer and paid administrators.

5. CONCLUSION

Curling Australia strongly supports the objectives of the National Anti-Doping Scheme and the broader integrity agenda. However, the current governance and resourcing structures place an unsustainable burden on smaller sports, undermining the effectiveness and equity of the system.

We urge the Committee to consider reforms that introduce proportionality, dedicated support, and equitable resourcing for smaller NSOs. Curling Australia remains committed to clean sport and would welcome further engagement with the JCPAA and Sport Integrity Australia to help shape practical and enduring reforms.