

(1) **The ANAO found that risk assessments for some user-pays sports were not completed.**
What specific processes have been established to ensure that risk assessments are completed for all sports?

Answer: We have included all sport disciplines for user-pay sports into the documented risk assessment process. Following the ANAO audit we have updated our procedures to ensure all sport disciplines for user-pay sports are included into the risk assessment process and that the risk assessments are reviewed annually.

(2) What controls does SIA have in place to ensure that discussions with user-pays sports during contract negotiations result in testing plans that are demonstrably risk-based and data driven?

Answer:

As a direct outcome from the ANAO audit, SIA has developed a standardised “testing proposal” template for our user-pay sports that explicitly states risk factors and proposal objectives. The testing proposal template is the control to ensure all discussions are risk based and data driven. The proposal maintains a documented rationale, understanding of shared risk and an audit trail for good governance.

(3) Given that risk assessments for user-pays sports were not consistently completed in 2022–23 and 2023–24, what assurance mechanisms are in place to ensure that the resulting test distribution plans are risk-based for user-pays sports?

Answer: The assurance mechanisms include executive oversight and approval of our risk assessment and test distribution plan for all sports (including user-pays). Following the ANAO audit we have updated our procedures to ensure all sport disciplines for user-pay sports are included into the risk assessment process and that the risk assessments are reviewed annually.

(4) What specific changes were made to the Test Distribution Planning Procedure to manage potential risks associated with preparing testing proposals for user-pays sports to approve prior to a service order being agreed?

Answer: The specific changes were:

- including User Pay sports in the Risk Assessment
- implementing a documented methodology for evaluation for all sports
- developing a testing proposal template which details testing programs that Sport Integrity Australia regard as suitable for the sport including minimum testing levels based on the risk profile of the sport and size of athlete cohort. The proposal maintains a documented rationale, understanding of shared risk and an audit trail for good governance.
- Established a Contract tracker to ensure new testing proposals are developed in line with the sporting calendar. This mitigates periods of no testing during high-risk periods such as the offseason.

(5) Why are there so few athletes from user-pays sports in testing pools?

Answer: Testing pools are not mandatory for each sport. Testing Pools are designed to facilitate no advance notice testing via the provision of Whereabouts information.

Given the burden placed on any athlete in a testing pool, particularly the Registered Testing Pool, athletes are only placed on these pools where there is a requirement for that information to be provided (including not easily being sourced elsewhere).

For any User Pay sports Testing Pools are not generally required as we receive Whereabouts information directly from the User Pay client. This is a requirement of the Contract. We receive training information and details of athlete's movements during the offseason directly from the client, thus removing the need for these athletes to be included on a Testing Pool. We have a similar arrangement for some Government Funded testing where there is high performance program run from a centralised location

(6) Do user-pays sports provide detailed location information for individual athletes?

Answer: Yes.

(7) How frequently do user-pays sports update SIA on training schedules and athlete locations?

Answer: This depends on the sport and club providing the information. We require the provision of accurate information shared in advance and without prompt. If a club fails to update us and we have a failed attempt at testing due to inaccurate information, a Missed Mission Fee is charged to the National Sporting Organisation. We actively seek access to online portals and calendars to ensure seamless and timely sharing of information.

(8) **The ANAO found that for the 2023–24 season, the AFL's target list of athletes did not include the reasons for targeting. For each of the years where lists were provided by the NRL and AFL, which were accompanied by documented reasons for athlete inclusion?**

Answer: The NRL always provided an inclusion reason. The AFL provided inclusion reasons for every year except the 2023-24 season.

(9) **SIA views NSOs as 'reliable third parties'. Information provided by SIA shows that the percentage of athletes tested from these lists varies from 38 to 98 per cent. What documented assurance processes are in place to ensure that the information provided by the sports in the form of target lists is reliable and risk-based?**

Answer:

The assurance process is now documented in the Developing the Test Distribution Plan Procedure which states SIA will critically review internal holdings (such as tip offs, an athlete's testing history and their biological data values) in conjunction with open-source information when assessing lists provided by sports.

(10) **SIA facilitates discussions with sports about risk factors that should be used to identify athletes in their lists. Between 2023 and 2024, the number of athletes on the NRL list increased by 474%. Did the risk factors used to place athletes on the list change between those two years? What accounts for the substantial increase in number of athletes on the list?**

Answer: The risk factors did not change between the two years. The list increased substantially as SIA actively sought and requested from the NRL a list of athletes who were currently on the last year of their current contract. Previously SIA had been relying on open-source information to gain this information.

(11) The Minister announced in October 2022 that SIA would be expanding its 1300 hotline for people to make complaints. How many calls has that hotline received since 2022?

(a) Provide a breakdown of the number of calls received each year from 2022-2025.

Answer:

Financial Year	Number of Safe Sport Hotline reports*	Number of General Enquiry Hotline reports**
2022/23 (commenced 30 Jan)	40	N/A
2023/24	145	397
2024/25	203	524
Grand Total	388	921

*The Safe Sport Hotline (the 1800 Hotline) commenced on 30 January 2023 in addition to the 1300 general enquiries line. Safe Sport Hotline figures above include those made to the 1800 hotline and 1300 general enquiries line where the caller wished to share their story about racism, cultural issue or child safeguarding concerns within sport.

**The General Enquiries Hotline (1300 Hotline) has been in existence since the establishment of SIA (ASADA before that). General Enquiries Hotline figures above include calls made to SIA where individuals have sought guidance, or wish to report a concern about a sport integrity issue. This figure excludes calls relating to anti-doping, Therapeutic Use Exemptions, Medicinal or SIA education enquiries. Due to changes in how we recorded call numbers, we are unable to provide complete call data prior to 1 July 2023.

(b) How many of those calls were made using the anonymous reporting function (yearly breakdown from 2022-2025)?

Answer:

SIA does not collect specific data on the number of anonymous/non-anonymous Safe Sport Hotline calls; however a review of available information indicates that approximately 43% of Safe Sport Hotline calls since 30 January 2023 did not provide their details.

The Safe Sport Hotline was established as an avenue for individuals in sport to share their story and for SIA to offer guidance to those callers – those callers may remain anonymous if they wish.

If the caller's concerns relate to child safeguarding or discrimination within a sport that has adopted the National Integrity Framework, then callers may be provided guidance about how they can submit a complaint to SIA under a sport's "Complaints, Disputes and Discipline Policy". In accordance with that Policy, formal complaints must be made in writing and cannot be anonymous.

(c) How many of those calls were made by identifiable individuals (yearly breakdown from 2022-2025)?

Answer:

SIA has not collected specific data on the number on anonymous/non-anonymous Safe Sport Hotline calls however a review of available information indicates that 57% of Safe Sport Hotline calls since 30 January 2023 provided their details.

(d) How many calls made since 2022 progressed to SIA's investigations process?

(i) Provide the number of calls pursued further each year from 2022-2025.

Answer:

SIA has not collected specific data on the number of Safe Sport Hotline calls that have progressed to investigation by SIA. The Safe Sport Hotline provides guidance and support for callers in providing complaints via our online form. SIA requires all complaints to be in writing.

(e) How many complaints to the 1300 hotline (since 2022) have not been investigated further by SIA?

(i) Provide the number of the complaints that have not been investigated further from 2022-2025

Answer:

SIA has not collected specific data on the number of Safe Sport Hotline calls that have progressed to investigation by SIA. The Safe Sport Hotline provides guidance and support for callers in providing complaints via our online form. SIA requires all complaints to be in writing.

(ii) Detail some of the reasons why this may be the case.

Answer:

SIA is confined by constitutional limits and needs to operate within the legislative functions and the confines of the framework set out in its enabling legislation, the Sport Integrity Australia Act 2020. SIA's specific legal remit is to manage complaints on behalf of sporting organisations that have adopted the National Integrity Framework (NIF) where the alleged conduct may breach the Safeguarding Children and Young People Policy or be defined as Discrimination under the Member Protection Policy.

(f) Has the effectiveness of the hotline been independently reviewed since 2022?

Answer: No.

(i) If yes, when and on how many occasions? Detail the findings of the reviews.

N/A

(ii) If not, when is it anticipated that it will be reviewed?

Answer:

No specific review is scheduled but based on this Inquiry, we will consider including this in the proposed National Integrity Framework 5-Year Review. The scope of this review including consultation is currently under development.

12. With regards to SIA's handling of complaints regarding mistreatment and abuse, the CEO made mention of the complaints-handling process involving the Information Coordination Centre once a complaint is initially received. How many complaints has the Information Coordination Centre received since 2022?

Answer: From 1 July 2022 – 3 June 2025, 1,825 Integrity Matters were recorded by ICC (note: not all matters are complaints).

a) What is the threshold that the complaint must reach before it is forwarded to the Integrity Complaints Team?

Answer: Sport Integrity Australia operates within a specific legal remit. For Sport Integrity Australia to have jurisdiction to manage a complaint, it must meet the following criteria:

- Must relate to a sport that has adopted the National Integrity Framework (NIF).
- Alleged conduct must be a potential breach of the Safeguarding Children and Young People Policy (SCYPP) or Discrimination under the Member Protection Policy (MPP).
- Alleged conduct must have occurred after the sporting organisation's adoption of the NIF
- The allegation must be made by the person impacted or if a child, by their parent or carer. Anonymous allegations cannot be investigated as doing so would not meet the requirements of procedural fairness.

b) Who is responsible for approving the Information Coordination Centre's assessment of the complaints received?

Answer: Matters that assessed as within SIA's legal remit are progressed by Information Coordination Centre (ICC) officers to the Integrity Complaints team.

c) The CEO mentioned that matters that “are not clear cut” may be referred to the operations committee which meets weekly. When was the operations committee established as part of this process?

Answer: The Operations Committee in its current form was established in May 2024.

i) Prior to the operations committee being involved in the process, where did matters that “are not clear cut” get referred to? Who made the final decision on those matters?

Answer: Prior to the formation of the Operations Committee, there was the Complaint Assessment Meeting.

ii) What is the total of complaint matters that have been considered by the operations committee for deliberation on the most appropriate course of action?

Answer: The number of this type of matters vary but are usually around 5-10 matters. Matters are often considered at more than one meeting.

iii) Does the Deputy CEO respond to these complaints as the chair of the operations committee? If not, who is responsible for responding once the complaint has been escalated to this level?

Answer: No.

Each complaint is allocated to an Integrity Complaints Case Manager. Responses to complaint parties generally occur through their assigned Case Manager. This ensures consistency and supports integrity in the process.

d) How many complaints have been forwarded to the Integrity Complaints Team for further investigation?

Answer: 919 (1 July 2022- 30 June 2025)

e) How many complaints have not been forwarded to the Integrity Complaints Team for further investigation?

Answer: 906 (1 July 2022- 30 June 2025)

i) How many of these complaints were submitted by testing officials?

Answer: We do not collect data on the number of complaints submitted by testing officials. It is also difficult to be definitive as some matters may be anonymous.

ii) How many of these complaints were submitted by athletes?

Answer: 222 integrity matters were directly submitted by athletes. A further 135 integrity matters were submitted by parents/guardians on behalf of athletes.

iii) How many of these complaints involved allegations of competition manipulation?

Answer: 39 integrity matters related to allegations of competition manipulation.

iv) How many involved allegations of athletes, testing officials or members of sporting organisations violating sports gambling policy?

Answer: We do not collect data on the number of allegations of athletes, testing officials or members of sporting organisations violating sports gambling policy. Any such allegations would be included within the 39 matters listed above.

13. In the December 12th hearing, the CEO mentioned that the organisation does not consider complaints of sexual misconduct against adults due to jurisdictional limitations.

a) What jurisdictional limitations are those? Can detail be provided around the reasoning behind this.

Answer: As a Commonwealth statutory agency, Sport Integrity Australia is confined by constitutional limits and needs to operate within the legislative functions and the confines of the framework set out in the Sport Integrity Australia Act. Under the Sport Integrity Australia Act, Sport Integrity Australia only has a specific legal remit to manage complaints on behalf of sporting organisations that have adopted

the National Integrity Framework (NIF) where the alleged conduct may breach the Safeguarding Children and Young People Policy or be defined as Discrimination under the Member Protection Policy.

b) Outline the procedure that SIA has in place to process complaints regarding sexual misconduct (e.g. how are they referred to the relevant team or third-party organisation).

Answer: SIA triages complaints to determine the most appropriate course of action. Regarding sexual misconduct where SIA has jurisdiction, we would investigate that matter and if appropriate refer to the police. SIA treats all matters that relates to sexual misconduct seriously and works with the complainant to provide a clear pathway for resolution of their matter.

c) How does this procedure differ if the complaint has been made against an official within a National Sporting Organisation?

Answer: Overall the procedure doesn't change. The specific individuals investigating the matter may vary depending on the nature of the case.

d) How does this procedure differ if the complaint has been made against a SIA testing official?

Answer: It is considered internally by SIA as an employment matter, given testing officials are SIA employees.

e) How many complaints regarding sexual misconduct has SIA received total?

Answer: Between 1 July 2022 and 30 June 2025, SIA has received 38 reports relating to alleged sexual misconduct under a sport's member protection policy.

i) Have all those complainants been advised by SIA of the appropriate agency/organisation better suited to pursue those matters?

Answer : SIA refers parties to alternate complaint pathways where possible.

ii) If not, why not? How is a complainant to know where to direct their complaint to receive an outcome?

Answer : As outlined above, SIA refers parties to alternate complaint pathways where possible. SIA's website also contains information on alternate complaint pathways.

f) In her response, the CEO referred to SIA's publicly available case categorisation system. The relevant website specifies that Category 2 complaints can include member protection against "harassing behaviours, including unwanted sexual interest", as well as Category 3 complaints which include "sexual misconduct and abuse". I note that this is separate from the child safe practices listed.

i) Can SIA provide clarity around this – does it investigate complaints regarding sexual misconduct against adults as per the information available on its website?

Answer: SIA does not have jurisdiction to manage sexual misconduct against some adults. For example, SIA would not investigate a historical matter prior to the implementation of the NIF. SIA

refers parties to alternate complaint pathways where appropriate.

The case categorisation tool has information to assist sporting organisations in implementing consistent and transparent complaint-management processes, including matters involving sexual misconduct against adults.

14. The CEO mentioned that internal reviews have been conducted to assess the effectiveness of the organisation's complaints-handling process.

a) List the years that these reviews were conducted.

Answer: 2022

b) Who were the internal reviews conducted by?

Answer: An independent contractor was engaged to conduct the review.

c) What were the findings in relation to SIA's effectiveness in handling complaints involving allegations of a violation of the competition manipulation and sports gambling policy under the National Integrity Framework?

Answer: The review was focused on the overarching process to ensure timeliness and efficiency, rather than on the effectiveness of handling any specific complaint types.

15. What was the average time frame in 2025 for a complaint to be responded to if it does not proceed to an investigation?

Answer: SIA's previous case management system did not have the capability to automatically report on complaint timeframes. SIA implemented a new Case Management System in October 2025 which will provide the capability to report on timeframes in the future. As part of the timeframes pilot, SIA aims to conduct the evaluation of routine complaints within 2-4 weeks.

a) Provide the average time frame for complaints that were lodged in 2024, and 2023.

Answer: Refer to Q15.

16. In the public hearing, the CEO made mention of a "time frame piloting" which is currently underway. When was the review of the complaints-handling timelines agreed upon?

Answer: April 2024.

a) When is it due to be completed?

Answer: June 2026.

(17) SIA's Risk Management Policy was “due to be updated in March 2024 but as of September 2024, SIA has not reviewed or revised the Risk Management Policy” [ANAO Report: Paragraph 2.21, Page 31].

(a) Why did SIA fail to review the Risk Management Policy in a timely manner?

(i) If not, why not?

Answer: SIA chose to undertake a comprehensive internal audit on the Risk Management Framework to inform the scheduled March 2024 update of our Risk Management Policy.

SIA then implemented the recommendations and provided the updated policy to SIA's Audit and Risk Committee in May 2025

(ii) If yes, provide an update.

Answer: N/A

(18) How often is the Risk Management Policy required to be reviewed? Since the audit, specify the scheduled review dates and each instance the Policy has been reviewed.

Answer:

The Policy is required to be reviewed, cleared, and endorsed every two years. However, as we make ad-hoc or periodic changes to our risk management framework, we will subsequently review and update the Policy to reflect those adjustments. The end-to-end formal review and endorsement continues to occur on a two-year cycle.

Since the ANAO audit, the Risk Management Policy has been reviewed in November 2024, May 2025 and September 2025

(19) Was the Minister aware that the risk management policy was out of date?

Answer: No.

(20) What framework did the SIA utilise to manage risks, with an out-of-date RMP?

Answer: The Risk Management Framework. SIA relied on the previous version of the Risk Management Framework while the Risk Management Policy was under review. The Framework remained in force during this period, as SIA policies continue to apply irrespective of their scheduled review date. Relevant committees also considered any known changes in the risk environment that may not yet have been captured in the version under review when applying the Framework.

(21) “Operational risk registers, including for anti-doping and the work of the Operations and Sport Engagement branches are not maintained” [ANAO Report: Paragraph 2.29, Page 33].”

(a) Can SIA provide details as to the specifics of what is to be recorded in its operational risk registers?

Answer: Operational risk registers will record the risk event, risk rating, whether the risk rating is accepted or requires controls, the control activities and whether the risk needs escalating to the enterprise risk level.

(b) Why did SIA fail to maintain its risk registers?

Answer: At the time of the audit, operational/section risk registers were not part of SIA's risk management framework, noting the Commonwealth Risk Management Policy (CRMP) does not mandate operational/section risk registers.

(22) In 2024, SIA's internal audit on the effectiveness of its risk management framework found that it "required significant work to ensure alignment with the revised Commonwealth Risk Management Policy" [ANAO Report: Paragraph 2.27, Page 32].

(a) By what process has SIA ensured that its updated Risk Management Policy is in alignment with the Commonwealth Risk Management Policy?

Answer: SIA conducted two internal reviews led by the Governance and Risk team resulting in updates to the Risk Management Policy (May 2025) that responded to the recommendations of the internal audit and feedback from SIA's Audit and Risk Committee.

The Risk Management Policy now clearly articulates all 9 CRMP elements and provides an overview of how SIA has or will implemented each element.

(23) In December 2023, the Audit and Risk Committee advised SIA's CEO that the agency would benefit from re-developing the enterprise risk register [ANAO Report: Paragraph 2.6, Page 26].

(a) What specific amendments were made to the enterprise risk register as part of updates to the Risk Management Policy?

Answer: Amendments to the enterprise risk register include:

- developing and incorporating 10 new and distinct enterprise risk events aligned with 7 separate risk categories which underpin SIA's operations
- identifying one overarching risk appetite statement for the agency, and specific and unique appetite and tolerance statements to align closely with SIA's new risk categories and risk events
- elevating controls to ensure the most necessary and effective controls are measured and monitored
- providing a consequence matrix which details potential risk consequences based on a specified risk rating

- developing
 - an executive snapshot capability for executive reporting
 - an intuitive risk template
 - a reporting template
 - an enterprise risk heat map.

(b) If none, why not?

Answer: N/A

(24) **SIA advised (Transcript, p. 14) that user pays sports 'have an option to go elsewhere' and not use SIA to oversee their anti-doping programs. Further, the audit noted SIA's view that it is not able to charge sports for the true cost of testing as it would 'almost completely' price it out of the market (3.23).**

What specific elements of a sport's anti-doping program may be overseen or administered by an entity other than SIA, while remaining compliant with the World Anti-Doping Code?

Answer: Sample collection.

Clause 18.5 of the Australian National Anti-Doping Policy provides scope for a sport to undertake testing under the authority of their international federation.

Several independent third-party sample collection agencies operate in Australia.

Where a sport is a signatory to the Code (such as the AFL), they are able to implement all elements of an anti-doping program themselves if they so choose.