



PARLIAMENT OF AUSTRALIA

Report 515: Inquiry into the effectiveness of Australia's National Anti-Doping Scheme

Joint Committee of Public Accounts and Audit

March 2026

CANBERRA

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ISBN 978-1-76092-864-3 (Printed version)

ISBN 978-1-76092-865-0 (HTML version)

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Foreword

Sport is an important part of Australian life and Sport Integrity Australia (SIA), as the regulator of Australia's National Anti-Doping Scheme, plays a critical role in safeguarding its integrity.

As a regulator, SIA is required to regulate in a manner that is demonstrably risk-based and data driven, and supported by effective governance and management arrangements that guard against the risks of regulatory capture.

The Committee's inquiry examined aspects of SIA's regulatory activities including: SIA's approach to preventing, detecting and responding to anti-doping rule violations; its governance arrangements; its regulatory approach to managing Australia's anti-doping testing program; and the robustness of its investigative framework and quality assurance practices.

During the inquiry, the Committee was concerned to find that SIA's approach to regulation, specifically in relation to sports that pay for their own anti-doping testing (user pays sports), is not consistently risk-based. SIA has chosen to administer the arrangements for these sports in a manner different to those who receive government-funded testing. Several aspects of SIA's testing program for user pays sports raise questions as to whether regulatory decisions are appropriately formed by robust risk assessments.

In the absence of clear, documented processes demonstrating how risk assessments inform decision-making, arrangements with user pays sports can create the perception of unequal treatment or regulatory capture. The Committee is not satisfied that SIA has demonstrated adequate controls to mitigate regulatory capture risks, or ensure consistency in its regulatory activities.

As to SIA's approach to investigations of potential anti-doping rule violations, critical to maintaining the integrity of Australia's anti-doping system, shortcomings were found in investigative practices, quality assurance processes, documentation, and adherence to procedures.

When a regulator's performance of its legislated responsibilities is found to be only partly effective, it becomes difficult for the Parliament and the public to have confidence in the work of that regulator.

The Committee made three recommendations to address some of its concerns. First, the Committee considers it crucial that SIA prioritises the development and implementation of effectiveness and efficiency performance measures for its key regulatory activities, in line with the Commonwealth Performance Framework. The absence of such measures is concerning. Developing metrics for anti-doping testing and investigations must be prioritised.

This is only the first step. These measures must be embedded into practice and supported by assurance processes to meaningfully strengthen accountability and oversight.

Second, the Committee determined that SIA must seriously consider how it manages the optics and risks of regulatory capture by the sports it regulates. Transparency and proper documentation of integrity controls are essential. The Committee recommended that SIA establishes, publishes and actively communicates a formal policy on gifts and benefits, clearly setting professional boundaries in its relationships with the regulated population. This responsibility does not rest with SIA alone. The regulated population must also refrain from offering gifts or benefits.

Third, the Committee was concerned with the way SIA receives information from some regulated entities, particularly user pays sports. Regulators are expected to obtain and assess information in a way that enables informed, risk-based decision-making. The Committee's recommendation that SIA requires information provided by sports to include documented risk factors is intended to strengthen transparency and support SIA to make risk-based and data informed decisions.

The Committee acknowledges that SIA has undertaken a body of work in response to issues identified by the Australian National Audit Office (ANAO). However, as demonstrated throughout the audit and this inquiry, policies, procedures and documentation alone are not sufficient. The practical application of these controls, and assurance that they are operating as intended, is critical.

While the specifics of the role SIA will have during the 2032 Olympic Games are yet to be negotiated, SIA itself has predicted that most of its doping control officers will be employed by the 2032 Olympic Games Organising Committee. SIA predicts that it is also likely to face increased demand for its services prior to the games, including from international organisations requesting testing services on international athletes. It is absolutely crucial that SIA has in place the policies and procedures, and assurance mechanisms, to operate at the highest level of probity for the important role it will have in this international showcase sporting event.

I thank the Deputy Chair and Committee members for their considered contributions to this inquiry. I also thank Sport Integrity Australia and the ANAO for their engagement with the Committee throughout the process.

Josh Burns MP

Chair

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Abbreviations

AAF	Adverse analytical findings
AFL	Australian Football League
AGIS	Australian Government Investigations Standard
ANAO	Australian National Audit Office
APS	Australian Public Service
APSC	Australian Public Service Commission
ASADA	Australian Sports Anti-Doping Authority
ASDMAC	Australian Sports Drug Medical Advisory Council
ATF	Atypical findings
CEO	Chief Executive Officer
Finance	Department of Finance
ISTI	International Standard for Testing and Investigations
NAAC	National Anti-Corruption Commission
NAD Policy	National Anti-Doping Policy
NAD Scheme	National Anti-Doping Scheme
NRL	National Rugby League
PAAF	Presumptive adverse analytical findings

PGPA Act	Public Governance, Performance and Accountability Act 2013
PGPA Rule	Public Governance, Performance and Accountability Rule 2014
Privacy Act	Privacy Act 1988
PS Act	Public Service Act 1999
RMG 128	Resource Management Guide 128: Regulator Performance
RMG 131	Resource Management Guide 131: Developing Performance Measures
SES	Senior Executive Service
SIA	Sport Integrity Australia
SIA Act	Sport Integrity Australia Act 2020
SIA audit	Auditor-General Report No. 27 of 2024–25: Sport Integrity Australia’s Management of the National Anti-Doping Scheme
the Committee	Joint Committee of Public Accounts and Audit
WAD Code	World Anti-Doping Code
WADA	World Anti-Doping Agency



Members

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Mr Simon Kennedy MP Cook, NSW

Ms Louise Miller-Frost MP Boothby, SA

Senator Barbara Pocock AG, SA

Ms Sally Sitou MP Reid, NSW

Mr Terry Young MP Longman, QLD



Terms of reference

The Committee will examine:

- The effectiveness of Sport Integrity Australia's (SIA's) testing and investigative functions in detecting and responding to unlawful doping in Australian sport
- The effectiveness of SIA's existing operating, governance and risk frameworks
- The alignment of Australia's Anti-Doping Scheme with both domestically and internationally established standards, performance measures, and best practices
- The success of SIA in promoting the standing and integrity of Australian sport both domestically and internationally
- The prevalence and causes of unlawful doping in Australian sport and the preventative measures currently in place to reduce its incidence.

This inquiry will also have particular regard to any matters contained in and associated with Auditor-General Report No. 27 of 2024–25: Sport Integrity Australia's Management of the National Anti-Doping Scheme.

List of recommendations

Recommendation 1

- 2.20** The Committee recommends that Sport Integrity Australia develops effectiveness and efficiency performance measures for anti-doping testing and investigations, as required by the Commonwealth Performance Framework. An update is to be provided to the Committee within six months and is to include:
- key milestones and deliverables in the action plan
 - the methodology being adopted to develop performance measures
 - the expected timeframe for achieving compliance with the Commonwealth Performance Framework.

Recommendation 2

- 2.73** The Committee recommends that Sport Integrity Australia establishes a formal policy on the acceptance of gifts and benefits. The policy is to be actively communicated to all regulated individuals and entities and be published in a prominent position on the Sport Integrity Australia website. An update on this recommendation is to be provided to the Committee within six months.

Recommendation 3

- 3.87** The Committee recommends that Sport Integrity Australia establishes a template for athlete lists provided by regulated entities that includes at a minimum the risk factors set out in the International Standard for Testing and Investigations. Sport Integrity Australia should make providing information in this format a requirement under contractual or other formal arrangements with national sporting organisations.



1. Introduction

Background to the inquiry

- 1.1 Under section 8(1) of the legislation establishing the Joint Committee of Public Accounts and Audit (the Committee), the *Public Accounts and Audit Committee Act 1951*, the Committee has several duties, one of which is to ‘examine all reports of the Auditor-General that are tabled in each House of the Parliament’.
- 1.2 The Committee is empowered to ‘report to both Houses of the Parliament, with any comment it thinks fit, on any items or matters in those reports, or any circumstances connected with them, that the Committee thinks should be drawn to the attention of the Parliament’.
- 1.3 On 4 September 2025, the Committee adopted an inquiry into the effectiveness of Australia’s National Anti-Doping Scheme. The inquiry would examine the existing frameworks underpinning the scheme, including their management and operation, to determine if they are fit-for-purpose to protect the integrity of Australian sport by detecting and preventing unlawful drug use by athletes.
- 1.4 The inquiry was to have particular regard to any matters contained in and associated with Auditor-General Report No. 27 of 2024–25: *Sport Integrity Australia’s Management of the National Anti-Doping Scheme* (SIA audit).

Conduct of the inquiry

- 1.5 The inquiry received six submissions and five supplementary submissions containing responses to questions provided in writing to the Committee or taken on notice at the public hearings. The Committee held two public hearings on 31 October 2025 and 12 December 2025.
- 1.6 A list of submissions and supplementary submissions is at Appendix A. Witnesses who appeared at the public hearings are listed at Appendix B.

Approach to the report

- 1.7 The report has been organised around the key thematic areas of focus for the Committee during the inquiry.
- 1.8 The first chapter of this report provides the background to the inquiry, including a summary of the SIA audit that formed the basis for the Committee’s inquiry. This

chapter also outlines key elements of the legislative, policy and regulatory framework applicable to Sport Integrity Australia (SIA), which are central to assessing its effectiveness as a regulator.

- 1.9 The second chapter focuses on SIA's internal processes, policies and frameworks, with consideration of governance practices; management of regulatory capture risks through integrity policies; and approaches to risk management.
- 1.10 The third chapter examines SIA's administration of key elements of the National Anti-Doping Scheme (NAD Scheme), focusing on testing and investigations under 'user pays' and 'government funded' testing arrangements. This chapter also examines SIA's broader investigations framework, approach to quality assurance, and approach to investigations.
- 1.11 The Committee does not relitigate in detail the findings of the audit reports that form the basis of its inquiries. Rather, it highlights a selection of key issues that in its judgement should be drawn to the particular attention of the Parliament, and makes recommendations with regard to these issues where appropriate. Entities should not draw from the content of a Committee report any conclusion as to the Committee's views on the importance of the breadth of the findings and recommendations found in a report of the Auditor-General.

Summary of audit report

- 1.12 SIA was established on 1 July 2020 by the *Sport Integrity Australia Act 2020* (SIA Act). SIA is designated as Australia's national anti-doping organisation under the United Nations Anti-Doping Convention and the World Anti-Doping Code (WAD Code). It has responsibility for managing the NAD Scheme, including the authority and responsibility to collect and test samples from athletes for the purpose of detecting anti-doping rule violations.
- 1.13 The purpose of the Australian National Audit Office's (ANAO) audit was to assess the effectiveness of SIA's management of the NAD Scheme. This included examining the effectiveness of SIA's governance arrangements; arrangements to prevent and detect anti-doping rule violations; and arrangements to investigate and respond to anti-doping rule violations.
- 1.14 The SIA audit found that:
 - SIA's management of the NAD Scheme is partly effective
 - governance arrangements for anti-doping are partly fit-for-purpose
 - anti-doping prevention and detection is largely effective for sports that have government-funded testing arrangements, and partly effective for sports that have user-pays arrangements

- SIA's arrangements to investigate and respond to anti-doping rule violations are partly effective.¹
- 1.15 The SIA audit made seven recommendations dealing with: performance measures; regulatory capture risks; procedures for test distribution planning; evaluation methodology; risk-based planning; investigative procedures; and quality assurance over investigations. SIA agreed to all recommendations.²
- 1.16 More broadly, the ANAO identified key messages relevant to other government entities. These messages deal with the management of regulatory capture risks; the need for regulatory activities to be risk-based and informed by data and intelligence; and the requirement for appropriate performance and impact measurement.³
- 1.17 The ANAO has found that the potential for scrutiny can improve entity performance. So as to capture some of the impacts of the existence of an external audit, the ANAO includes in its report a summary of key improvements made by entities during an audit. During the course of the SIA audit, the Audit and Risk Committee received a risk management update, which stated SIA had commenced a project to improve its risk management framework; further, an internal audit on SIA's risk management framework was presented to the Audit and Risk Committee. SIA also:
- established terms of reference for the Executive Committee, Project Review Committee and Operations Committee
 - developed a 'developing a test distribution plan'
 - updated and approved procedures for planning testing missions for government funded and user pays sports
 - reviewed investigations processes in response to timeliness issues
 - executed a contract to procure a cloud-based system for investigations to replace current system
 - established a fraud and corruption control procedure
 - updated the Audit and Risk Committee Charter
 - documented consolidated analysis of planning day evaluations of the 2022–23 anti-doping testing program for sports/disciplines within the audit sample
 - considered the investigations manual and procedures against the Australian Government Investigations Standard 2022 requirements
 - established a complaints policy and procedure
 - updated the gifts and benefits policy and conflict of interest policy

¹ Australian National Audit Office (ANAO), *Auditor-General Report No. 27 2024–25: Sport Integrity Australia's Management of the National Anti-Doping Scheme* (SIA Audit), 3 March 2025, p. 6.

² ANAO, *SIA Audit*, p. 6.

³ ANAO, *SIA Audit*, pp. 12–13.

- established business planning guidance and a template for section-level business planning.⁴

Evaluating regulator performance

1.18 When it conducts its audits, the ANAO establishes criteria against which to assess the performance of a particular activity. These criteria serve as benchmarks for evaluation. Criteria may be drawn from a number of sources, including:

- policy decisions or policy statements
- legislation and regulations
- published performance measures and internal measures
- policies and guidance developed by central entities, regulators or government
- standards of good practice, relevant benchmarks and relevant practice guides developed by professions, associations or other recognised authorities
- statistics, practices, benchmarks, performance standards or procedures developed within the entity
- subject matter or general literature.⁵

1.19 In the case of the SIA audit, the ANAO referenced a number of sources that establish relevant performance requirements. These included:

- enabling legislation that provides regulatory powers and obligations to SIA, and the policies and directions derived from that legislation,
- the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and delegated legislation including the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule)
- the Australian Government *Regulatory Policy, Practice & Performance Framework* developed by the Department of Finance (Finance)
- the WAD Code and its associated International Standards
- the AGIS 2022
- resource management guides produced by Finance.

Public Governance, Performance and Accountability Act and Rule

1.20 Specific aspects of the PGPA Act and PGPA Rule are relevant to the responsibilities of SIA examined in the audit that formed the basis of this inquiry, including risk management and integrity matters, and performance measures.

⁴ ANAO, *SIA Audit*, pp. 93–94.

⁵ ANAO, *ANAO Audit Manual—Performance Audit Services Group Specific*, last updated 9 September 2025, <https://www.anao.gov.au/work/audit-manual/pasg-specific>, paragraph 207.32.

- 1.21 Amongst other things, a Commonwealth entity is required to have risk management embedded into its decision making; periodically review the effectiveness of controls; regularly review its risk management approach; and support a culture where risk is managed and communicated across all levels of the entity and individuals are encouraged to adopt positive risk behaviours.⁶
- 1.22 A key principle in the National Anti-Corruption Commission's Commonwealth Integrity Maturity Framework is that entities periodically assess the maturity of their management of integrity risks.⁷
- 1.23 The Commonwealth Performance Framework gives effect to legal obligations under the PGPA Act and the PGPA Rule. It places obligations on accountable authorities for the quality and reliability of performance information provided to the Parliament and the public.⁸
- 1.24 The Commonwealth Performance Framework requires entities to:
- set out in a corporate plan, the entity's purpose, key activities and the results it plans to achieve
 - create performance measures and targets to measure an entity's performance in achieving its purpose
 - publish statements about the annual performance of the entity in achieving its purpose, which are included in the entity's annual report.⁹

Regulatory Policy, Practice and Performance Framework

- 1.25 The August 2024 *Regulatory Policy, Practice and Performance Framework*, which applies to policymakers and regulators, is a 'better practice approach to regulation' that aims to drive modern, fit-for-purpose regulation.
- 1.26 It is an expectation that regulators should align the implementation of regulation and regulatory management with the six principles in the framework:
- targeted and risk based
 - integrated in existing systems
 - user-centred
 - evidence-based and data-driven

⁶ Department of Finance, *Commonwealth Risk Management Policy*, last updated 29 November 2022, <https://www.finance.gov.au/government/comcover/risk-services/management/commonwealth-risk-management-policy>.

⁷ ANAO, *SIA Audit*, p. 22.

⁸ ANAO, *Reporting Meaningful Performance Information*, 29 June 2023, <https://www.anao.gov.au/work/insights/reporting-meaningful-performance-information>.

⁹ Department of Finance, *Commonwealth Performance Framework*, last updated 23 September 2024, <https://www.finance.gov.au/government/managing-commonwealth-resources/planning-and-reporting/commonwealth-performance-framework>.

- reflective of the digital era
- continuously improved and outcomes-focussed.¹⁰

Resource management guides

RMG 128: Regulator performance

- 1.27 The *Regulatory Policy, Practice and Performance Framework*, discussed above, underpins the best practice approach and principles of regulator performance in *Resource Management Guide 128: Regulator Performance* (RMG 128).
- 1.28 RMG 128 establishes the three principles of regulator best practice against which regulators are required to report in their corporate plans and annual reports:
- continuous improvement and building trust—regulators should embed methodologies to understand the costs, impact and outcomes of regulation; have embedded organisational values and culture; have transparent external accountability processes; undertake regular and independent performance reviews
 - risk-based and data driven—all elements of the regulatory cycle, including operational policy development, administration, compliance and enforcement are risk-based and informed by data, evidence and intelligence, which allows regulators to respond in a proportionate way to the harm being managed and direct resources in the most efficient way
 - collaboration and engagement—regulators should be transparent, open and responsive to feedback; engage genuinely with stakeholders and the broader community through a range of meaningful and timely consultation mechanisms; and implement innovative approaches.¹¹

RMG 131: Developing performance measures

- 1.29 *Resource Management Guide 131: Developing performance measures* (RMG 131), produced by Finance, provides guidance on the obligations accountable authorities have to measure and assess the performance of an entity in achieving its purpose. It provides information on how entities might satisfy each of the requirements established in section 16EA of the PGPA Rule, discussed above.¹²

¹⁰ Department of Finance, *Regulatory Policy, Practice and Performance Framework*, last updated 18 November 2025, p. 7.

¹¹ Department of Finance, *Regulator Performance (RMG 128)*, last updated 18 November 2025, <https://www.finance.gov.au/government/managing-commonwealth-resources/regulator-performance-rmg-128>.

¹² Department of Finance, *Developing Performance measures (RMG 131)*, last updated 8 August 2025, <https://www.finance.gov.au/government/managing-commonwealth-resources/developing-performance-measures-rmg--131>.

Other legislation

Sport Integrity Australia Act 2020 and Sport Integrity Regulations 2020

- 1.30 The primary legislative framework that establishes SIA's responsibilities is the SIA Act, and the Sport Integrity Regulations 2020 (SIA Regulations). The SIA Act establishes SIA to prevent and address threats to sports integrity and to coordinate a national approach to sports integrity matters in Australia.
- 1.31 Section 3 of the SIA Act and schedule 1 of the SIA Regulations set out the requirements for SIA to establish a NAD Scheme.
- 1.32 The SIA Act and SIA Regulations also provide for the establishment and functions of the SIA Advisory Council and the Australian Sports Drug Medical Advisory Committee, including their membership, appointment of members, and obligation to disclose interests.¹³

Public Service Act 1999

- 1.33 The *Public Service Act 1999* governs members of the Australian Public Service (APS) and includes the APS Values and Code of Conduct. These outline requirements for APS employees in managing conflicts of interest.
- 1.34 The Australian Public Service Commission's *APS Values and Code of Conduct in Practice* outlines requirements for senior executive service declarations; notifications of outside employment; and avoiding the acceptance of gifts or benefits.¹⁴

World Anti-Doping Code

- 1.35 The WAD Code is the core document that harmonises anti-doping policies, rules and regulations around the world. During the audit, the 2021 WAD Code was in place.¹⁵
- 1.36 As the national anti-doping organisation for Australia, SIA has the primary authority and responsibility at the national level to adopt and implement anti-doping rules, direct the collection of samples, manage test results, and conduct results management.¹⁶
- 1.37 The WAD Code consists of four parts: doping control (articles 1–17); education and research (article 18 and 19); roles and responsibilities (articles 20–22); and acceptance, compliance, modification and interpretation (articles 23–27).¹⁷ The ANAO's audit considered relevant aspects of SIA's policies and practices against the

¹³ *Sport Integrity Australia Act 2020*, pts 4 and 7.

¹⁴ Australian Public Service Commission, *APS Values and Code of Conduct in Practice*, last updated 13 September 2021.

¹⁵ World Anti-Doping Agency (WADA), *World Anti-Doping Code 2021*, 1 January 2021.

¹⁶ *Sport Integrity Regulations 2020*, cl 1.05.

¹⁷ WADA, *World Anti-Doping Code 2021*, 1 January 2021, pp. 1–8.

WAD Code, including those relating to anti-doping education plans, the test distribution planning process, and testing activities.¹⁸

- 1.38 SIA has established a national anti-doping policy (NAD Policy) that aligns with the WAD Code, and which, as of September 2024, had been adopted by 98 sporting organisations in Australia, including 87 national sporting organisations for Australia.¹⁹ The NAD Policy comprises 21 articles that cover requirements for prohibited substances, testing and investigations, analysis of samples, hearings, sanctions and consequences, confidentiality and reporting, education, and research, among other matters.²⁰

International Standards

- 1.39 The WAD Code works in conjunction with eight 'international standards that aim to foster consistency among anti-doping organisations for specific technical and operational parts of anti-doping programs. Adherence to the international standards is mandatory for compliance with the WAD Code.²¹
- 1.40 During the audit, the applicable international standards included: testing and investigations; laboratories; therapeutic use exemptions; prohibited list; protection of privacy and personal information; code compliance by signatories; education; and results management.²²

Australian Government Investigations Standard

- 1.41 The AGIS, which was established in 2011 and updated in 2022, establishes the standard for Australian Government entities conducting administrative, civil, or criminal (type) investigations.²³
- 1.42 The AGIS 2022 establishes core requirements, best practice elements and guidance. Amongst other things, the AGIS requires that investigators be suitably qualified, that appropriate information management and evidence handling protocols are maintained, that risks be managed to ensure requirements of admissible evidence are met, and that quality assurance is prioritised.²⁴
- 1.43 Entities are required to establish a proactive implementation plan and update their standards to the AGIS 2022 within a reasonable timeframe.²⁵

¹⁸ ANAO, *SIA Audit*, p. 10.

¹⁹ ANAO, *SIA Audit*, p. 9.

²⁰ ANAO, *SIA Audit*, p. 42.

²¹ WADA, *World Anti-Doping Code 2021*, p. 10.

²² WADA, *International Standards*, <https://www.wada-ama.org/en/what-we-do/international-standards> (accessed 10 November 2025).

²³ Australian Government, *Australian Government Investigations Standard (AGIS)*, October 2022, p. 1.

²⁴ Australian Government, *AGIS*, October 2022, p. 1.

²⁵ Attorney-General's Department, *Australian Government Investigations Standards*, <https://www.ag.gov.au/integrity/publications/australian-government-investigations-standards> (accessed 4 November 2025).



2. Approaches to governance and risk

Introduction

2.1 This chapter explores Sport Integrity Australia's (SIA) governance of risk, specifically its approach to risk management in general and regulatory capture risks in particular. It also discusses SIA's failure to assess its performance of key regulatory functions.

Risk management not fit for purpose

2.2 Under the *Public Governance and Accountability Act 2013* (PGPA Act), accountable authorities must establish and maintain an appropriate system of risk oversight and management.¹

2.3 This obligation is reinforced by the Commonwealth Risk Management Policy (as outlined in Chapter 1) which requires entities to:

- embed risk management into decision-making
- have a risk management framework that supports a culture where risk is managed and communicated across all levels and individuals are encouraged to adopt positive risk behaviours
- periodically review the effectiveness of controls
- implement arrangements for identifying, managing and escalating emerging risks
- regularly review their risk management approach.²

2.4 The Australian National Audit Office (ANAO) found that SIA's risk management practices, including for regulatory capture risks (discussed later in this chapter) were not fit for purpose.³ Deficiencies were identified across policy, implementation and monitoring.

2.5 Table 2.1 below summarises the ANAO's findings regarding SIA's risk management practices.

¹ *Public Governance and Accountability Act 2013*, s 16.

² See: Department of Finance, *Commonwealth Risk Management Policy*, last updated 29 November 2022, <https://www.finance.gov.au/government/comcover/risk-services/management/commonwealth-risk-management-policy>.

³ Australian National Audit Office (ANAO), *Auditor-General Report No. 27 2024–25: Sport Integrity Australia's Management of the National Anti-Doping Scheme* (SIA Audit), 3 March 2025, p. 22.

Table 2.1 SIA risk management practices

Entity/policy	Detail
Audit and Risk Committee	<ul style="list-style-type: none"> - Noted enterprise risk register or deficiencies in risk management framework at 14 of 16 meetings - Papers relating to enterprise risk management ‘taken as read’ or ‘noted’ - Advised CEO in December 2023 that SIA would benefit from further work to embed risk appetite and tolerance statements, and to re-develop enterprise risk register
Chief Executive Officer	<ul style="list-style-type: none"> - Certified fraud had been appropriately dealt with in 2021–22, 2022–23, 2023–24 including through agency-prepared fraud risk assessments and control plans - No fraud control plans prepared in 2021–22 or 2022–23 - Fraud and corruption control plan drafted in July 2024, endorsed October 2024
Risk management policy	<ul style="list-style-type: none"> - Established in March 2021, updated March 2023; scheduled update in March 2024 did not occur
Risk appetite statements	<ul style="list-style-type: none"> - Overall risk appetite statement in risk management policy, and risk appetite assessments in risk appetite and tolerance matrix, not consistent
Enterprise risk register	<ul style="list-style-type: none"> - Established October 2020, last updated November 2021 - Risk types do not align with risk categories, risk appetite and tolerance matrix or risk management procedure
Operational risk registers	<ul style="list-style-type: none"> - Not maintained, including for anti-doping work

Source: ANAO, *SIA Audit*, paragraphs 2.6, 2.20–2.22, 2.24–2.25 and 2.29.

- 2.6 These deficiencies indicate that risk management was neither embedded in businesses processes appropriately, nor systematically reviewed and updated, contrary to the requirements of the Commonwealth Risk Management Policy.
- 2.7 While SIA has undertaken activities to improve its risk management framework, some of these actions coincided with the ANAO’s audit. The ANAO notes that it is unclear whether the actions it observed during the course of the audit were planned in response to the proposed or actual audit activity, and that assurance has not been obtained over the source of these actions or whether they have all been appropriately implemented.⁴
- 2.8 Regardless of the impetus, the Audit and Risk Committee received updates in March and September 2024 stating that SIA had commenced a project to improve its risk management framework. A draft report—originally intended to be completed by May 2024—was presented in December 2024. The draft report concluded SIA’s risk management framework and supporting artefacts required ‘significant work’ to ensure alignment with the Commonwealth Risk Management Policy.⁵ SIA has since

⁴ ANAO, *SIA Audit*, p. 93.

⁵ ANAO, *SIA Audit*, paragraph 2.27.

commenced a project to consolidate, refine and simplify enterprise risks and risk management artefacts.⁶

- 2.9 Since the conclusion of the audit, SIA advised that its updated risk management policy ensures alignment to the Commonwealth Risk Management Policy. It has introduced an overarching risk appetite statement and refined enterprise risks. The broader risk management framework also includes risk registers, risk matrices, risk assessment templates, reporting tools, and guidance for staff on the development of risk assessments.⁷

Committee comment

- 2.10 The Committee acknowledges that SIA has taken steps to update its approach to risk management, including revising its risk management framework, refining enterprise risks, and developing updated tools and templates.
- 2.11 While these actions indicate progress towards alignment with regulatory requirements, the ANAO's findings demonstrate that key elements of SIA's risk management framework were not consistently reviewed, maintained or implemented in a timely or systematic manner during the audit period.

Efficiency and effectiveness performance measures

- 2.12 Entities are required to develop and implement annual performance measures, including measures of entity outputs, efficiency and effectiveness.⁸
- 2.13 A key message from the SIA audit for all Australian Government entities was that regulators should establish an appropriate data-driven methodology for evaluating the effectiveness of regulatory planning and associated activities.⁹ High quality performance reporting enables the Parliament and the public to assess whether entities deliver the outcomes for which they are funded. It also provides the basis on which accountable authorities can be held to account.¹⁰
- 2.14 SIA does not publicly report on the effectiveness or efficiency of anti-doping testing and investigations—a key regulatory function. There is no measure of the effectiveness or efficiency of these activities. Rather, SIA's performance measures are predominantly activity or output measures.¹¹

⁶ ANAO, *SIA Audit*, paragraph 2.27.

⁷ Sport Integrity Australia (SIA), *Supplementary Submission 1.2*, p. 1.

⁸ ANAO, *SIA Audit*, paragraph 2.10.

⁹ ANAO, *SIA Audit*, p. 13.

¹⁰ ANAO, *Using Performance Information to Drive Effectiveness*, 29 November 2023, <https://www.anao.gov.au/work/insights/using-performance-information-to-drive-effectiveness>.

¹¹ ANAO, *SIA Audit*, paragraph 2.11.

- 2.15 The ANAO recommended SIA develop effectiveness and efficiency measures and targets for anti-doping testing and investigations as required by the Commonwealth Performance Framework.
- 2.16 In response, SIA advised that there is no globally recognised measure of effectiveness for anti-doping testing, and it would continue to explore options. It has 'engaged expert support' to assist with determining the data and methodology required to develop these measures. The work will include the development of an action plan to guide SIA's maturation of the performance measure, with the action plan expected to be in place by the first half of 2026.¹²

Committee comment

- 2.17 Regardless of whether there is a globally recognised measure of effectiveness for anti-doping testing, SIA is required to develop and implement annual performance measures of efficiency and effectiveness.
- 2.18 Anti-doping testing and investigations are significant areas of SIA's regulatory responsibility. Without performance measures that reflect the efficiency and effectiveness of these activities, reporting does not provide meaningful assurance that SIA's regulatory activities are achieving their intended outcomes and that effectiveness is being appropriately considered.
- 2.19 It is the Committee's view that developing and implementing effectiveness and efficiency measures for anti-doping testing and investigations must be prioritised. However, developing measures is only the first step. Embedding these measures into practice and establishing assurance processes will be crucial to supporting compliance and accountability.

Recommendation 1

- 2.20 The Committee recommends that Sport Integrity Australia develops effectiveness and efficiency performance measures for anti-doping testing and investigations, as required by the Commonwealth Performance Framework. An update is to be provided to the Committee within six months and is to include:**
- **key milestones and deliverables in the action plan**
 - **the methodology being adopted to develop performance measures**
 - **the expected timeframe for achieving compliance with the Commonwealth Performance Framework.**

¹² SIA, *Supplementary Submission 1.2*, p. 5.

Management of regulatory capture risks

- 2.21 Regulators face unique risks, including the risk of regulatory capture, stemming from their regulatory functions. Regulatory capture refers to instances where regulators are excessively influenced or effectively controlled by the entities they regulate. In such cases, regulators may align their values and actions with those of the industry rather than with the values and legislated purpose of the regulator.¹³
- 2.22 Requirements under the *Public Service Act 1999* (PS Act), including the Australian Public Service (APS) Values and Code of Conduct, guidance from the Australian Public Service Commission (APSC) on managing gifts and benefits and conflicts of interest also apply to regulators.¹⁴
- 2.23 In addition, SIA must also comply with the conflict of interest requirements set out in: the World Anti-Doping Agency (WADA) Guide for the Operational Independence of National Anti-Doping Organisations; *SIA Regulations 2020*; and the WADA International Standard for Testing and Investigations.¹⁵
- 2.24 For example, the WADA International Standard for Testing and Investigations sets out that in order to meet the World Anti-Doping Code (WAD Code) requirements, national anti-doping organisations are to ensure the application of high professional and integrity standards to their operational and oversight functions, including conflict of interest policies.¹⁶
- 2.25 In coming to its conclusion that SIA's overall risk management framework, including for regulatory capture risks, was not fit for purpose, the ANAO found that SIA had not identified or assessed regulatory capture risks, had not evaluated its regulatory capture risk maturity, and had not conducted internal audits to examine these risks.¹⁷ While SIA has established a largely fit-for-purpose policy framework addressing conflicts of interest, gifts and benefits, and outside employment, these policies have been poorly implemented.¹⁸
- 2.26 The following section examines SIA's management of controls in three key areas: conflicts of interest; gifts and benefits; and outside employment.

¹³ Parliamentary Joint Committee on Corporations and Financial Services, *Oversight of the Australian Securities and Investments Commission, the Takeovers Panel and Corporations Legislation (Report No. 1 of the 45th Parliament)*, 13 February 2019, p. 27.

¹⁴ ANAO, *Insights: Auditing Regulatory Activities*, 24 June 2025, <https://www.anao.gov.au/work/insights/auditing-regulatory-activities>.

¹⁵ ANAO, *SIA Audit*, paragraph 2.32.

¹⁶ For example, to meet the 2021 WAD Code requirements, national anti-doping organisations are to ensure the application of high professional and integrity standards to their operational and oversight functions, including conflict of interest policies. See: World Anti-Doping Agency (WADA), *Guide for the Operational Independence of National Anti-Doping Organisations*, 9 November 2020, p. 8.

¹⁷ ANAO, *SIA Audit*, paragraph 2.30.

¹⁸ ANAO, *SIA Audit*, p. 9.

Management of conflicts of interest

- 2.27 Conflict of interest risks, which can arise from the acceptance of gifts and benefits or through secondary employment, are a type of regulatory capture risk.¹⁹ Conflicts of interest can be actual, potential or perceived. The National Anti-Corruption Commission (NACC) states that conflicts of interest arise when an official's interests, affiliations or relationships impact, can potentially impact or can be perceived to impact their impartiality in the discharge of their official duties.²⁰
- 2.28 The *PS Act 1999*, including the APS Values and Code of Conduct outline requirements for employees in managing conflicts of interest. This is supplemented by guidance from the APSC containing additional requirements, including public registers, for agency heads.²¹
- 2.29 The audit found that SIA had a conflict of interest policy that drew attention to the unique operating environment and business of SIA. The policy noted that membership or participation in a sport, sporting organisation or sporting environment may give rise to a conflict.²² The conflict of interest policy stated that on commencement and annually, SIA employees must declare all conflicts of interest by completing a declaration.²³
- 2.30 However, notwithstanding the existence of the policy, SIA's registers for conflicts of interest were not maintained, with missing and incomplete declarations and minimal evidence of executive oversight or conflict management actions.²⁴
- 2.31 Particular issues with Senior Executive Service (SES) declarations were highlighted by the ANAO. For eight SES officials, declarations were not made in each applicable year, and no officials completed the annual declaration form for 2023–24.²⁵ For the four SES officials who made at least one declaration in the review period, forms were incomplete, there were no management strategies where appropriate, and it was unclear as to whether the Chief Executive Officer (CEO) had considered the declared conflicts to be material.²⁶
- 2.32 At the time of the audit, SIA advised there was a view that if SES officers did not believe there was a real or perceived conflict, there was no requirement to complete a declaration.²⁷

¹⁹ ANAO, *SIA Audit*, paragraph 2.31.

²⁰ National Anti-Corruption Commission (NACC), *Integrity Outlook 2022/23*, October 2023, p. 9

²¹ Australian Public Service Commission (APSC), *Guidance for Agency Heads – Gifts and Benefits*, 30 November 2021, last updated 20 October 2023, <https://www.apsc.gov.au/conflict-interest/guidance-agency-heads-gifts-and-benefits>.

²² ANAO, *SIA Audit*, paragraph 2.33.

²³ ANAO, *SIA Audit*, paragraph 2.36.

²⁴ ANAO, *SIA Audit*, paragraph 2.35.

²⁵ ANAO, *SIA Audit*, paragraph 2.35.

²⁶ ANAO, *SIA Audit*, paragraph 2.37.

²⁷ Dr Sarah Benson PSM, Chief Executive Officer, Sport Integrity Australia (SIA), *Committee Hansard*, 31 October 2025, p. 6.

- 2.33 SIA stated the policy has since been updated to reflect the requirement to complete declarations annually, regardless of whether there is no real or perceived conflict, and that this is being facilitated through a new online tool. SIA stated:

We now monitor trends as well, thanks to the recommendation. We've monitored any trends or hotspots we might have in the agency—where there are conflicts or perceived conflicts and where we might need to increase education or update the procedure. The audit did, certainly, shine a light on enhancing our documented processes. But also, we're trying to go one step further to make sure we've got some insights into what we've got going on in the agency with respect to potential conflicts.²⁸

- 2.34 SIA has introduced an updated online conflict of interest and gifts and benefits tool to address the identified weaknesses by the ANAO. The tool prevents incomplete entries; mandates the approval of a conflict of interest management plan prior to approval; establishes a workflow for individual declarations through to SES delegates; and provides quarterly reporting for executive review. SIA claims the tool improves the ease of making declarations and increases staff awareness of the process.²⁹

Committee comment

- 2.35 The audit found officers at all levels were failing to adhere to conflict of interest requirements, raising questions as to whether staff understand their conflict of interest obligations, and whether SIA's governance culture supports transparency and integrity.
- 2.36 The Committee acknowledges that SIA has updated controls for identifying and managing conflicts of interest to address issues identified by the ANAO.
- 2.37 The Committee considers that these improvements go some way towards addressing the ANAO's identified weaknesses in the implementation and oversight of integrity controls. However, ensuring staff awareness and proactive disclosure remain crucial and continuing priorities.
- 2.38 While quarterly reports of declared interests is a positive step, the Committee remains uncertain as to how this process provides assurance that the reporting is accurate, complete and supported by effective management strategies.

Advisory, oversight and assurance bodies

- 2.39 The Committee examined SIA's management of conflicts of interest within its advisory, oversight and assurance bodies. Some of these bodies, including the Advisory Council, rely on the appointment of external members to provide expertise. These appointees often hold roles or interests connected to SIA's regulatory

²⁸ Dr Sarah Benson PSM, SIA, *Committee Hansard*, 31 October 2025, p. 6.

²⁹ SIA, *Supplementary Submission 1.2*, p. 2.

activities. In general, the ANAO found variabilities in the documentation and management of potential conflicts of interest in the context of its advisory, oversight and assurance bodies.³⁰

2.40 The ANAO reviewed governance arrangements for advisory, oversight and assurance bodies, including terms of reference, membership, meeting frequency, functions, management of potential conflicts of interest, management of risk, and discussion of anti-doping and other integrity matters.³¹

2.41 Table 2.2 below provides an overview of the conflict of interest issues detailed by the ANAO.

Table 2.2 Conflict of interest issues relating to advisory, oversight and assurance bodies

Body	Conflict of interest issue
<i>Advisory committees (July 2021 to November 2024)</i>	
Advisory Council	<ul style="list-style-type: none"> - Annual deed poll not completed as required in 2024 for any members - One appointee did not declare interests in a firm engaged by SIA prior to and following the member's appointment - Disclosures of conflicts of interest not made at all meetings, and minutes do not document how declared conflicts of interests were managed in the meeting - Members with wagering interests were present for discussions relating to Australian Sports Wagering Scheme, and did not always disclose wagering interests when wagering was discussed
Australian Sports Drug Medical Advisory Committee	<ul style="list-style-type: none"> - 10 instances where declarations of interests to minister not completed as required
Athlete Advisory Group	<ul style="list-style-type: none"> - Conflicts of interest not disclosed or discussed at any meetings where minutes were available
Sport Sector Advisory Group on Education	<ul style="list-style-type: none"> - No documented declarations of conflicts of interest in meeting minutes or otherwise declared to the Chair between August 2023 and June 2024
<i>Oversight committees (July 2022 to November 2024)</i>	
Executive Committee	<ul style="list-style-type: none"> - Declarations of potential conflicts of interest not documented in minutes for 7 meetings
Operations Committee	<ul style="list-style-type: none"> - Meeting minutes from 59 meetings include declarations of conflicts of interest and state, where a conflict was declared that the member would leave the room if matters relevant to the conflict were discussed. - Minutes for 4 meetings do not include any conflict of interest declarations

³⁰ ANAO, *SIA Audit*, paragraph 2.6 and Appendix 3.

³¹ ANAO, *SIA Audit*, pp. 25–26.

Body	Conflict of interest issue
Project Review Committee	- Declarations of potential conflicts of interest documented in minutes at all meetings except 3
Assurance committees (2021–22 to 2023–24)	
Audit and Risk Committee	- Declarations of conflicts of interest documented in minutes for 16 of 19 meetings

Source: ANAO, *SIA Audit*, Appendix 3.

- 2.42 The audit drew particular attention to the operation of the Advisory Council and the Australian Sports Drug Medical Advisory Council (ASDMAC), and found SIA could review its controls for declaring conflicts of interest.³²
- 2.43 Where conflicts cannot be avoided, the APS Code of Conduct, section 29 of the PGPA Act, and section 16 of the PGPA Rule require that employees must disclose details of any material personal interest.³³
- 2.44 Section 33 of the SIA Act requires members of the Advisory Council to disclose interests to the Minister. The charter states that a deed poll is to be completed at the commencement of appointment and annually thereafter. SIA's 2021 conflict of interest policy also applies to Advisory Council members.³⁴
- 2.45 Of particular concern to the Committee is that members of the Advisory Council with wagering interests participated in discussions on the Australian Sports Wagering Scheme and did not consistently disclose those interests. In private interest declarations, two members declared interests related to wagering—one a sports wagering sector lobbyist and the other undertook work for a wagering company.³⁵
- 2.46 As explained by the ANAO:
- ...in seven of the eight meetings there were disclosures of potential conflicts. However, the minutes did not follow a consistent format with regard to that. Both members with wagering interests were present for several discussions relating to the Australian Sports Wagering Scheme. This was discussed in six of eight meetings. One of those members disclosed their wagering interests at one of those six meetings that included discussions on wagering, and the other disclosed their interest at three of those six meetings. We don't know whether they left the room.³⁶
- 2.47 The Committee questioned the appropriateness of members with wagering interests providing advice through the Advisory Council. SIA argued that industry expertise is

³² ANAO, *SIA Audit*, paragraph 2.7.

³³ ANAO, *Auditing Regulatory Activities*, 24 June 2025, <https://www.anao.gov.au/work/insights/auditing-regulatory-activities>.

³⁴ ANAO, *SIA Audit*, p. 95.

³⁵ ANAO, *SIA Audit*, pp. 95–96.

³⁶ Ms Christine Chalmers, ANAO, *Committee Hansard*, 31 October 2025, p. 16.

sought to provide advice on certain aspects of policy development in the context of manipulation and match-fixing.³⁷ SIA operates the national platform for information sharing as a signatory to the Macolin Convention on the manipulation of sports competitions.³⁸

- 2.48 However, the Advisory Council is not the only way SIA engages with the gambling industry. SIA advised that it receives alerts from the industry in terms of monitoring threats to gambling or on match-fixing, and it works with the industry to assist in developing policy responses to match-fixing.³⁹
- 2.49 The ANAO acknowledged that it is reasonable for advisory boards to include members with relevant sector expertise. The ANAO told the Committee that the issue lies not in the presence of interests, but in how interests that could influence the advice being provided are managed.⁴⁰ The ANAO emphasised that risks arise where regulators do not clearly and transparently identify and manage associated interests, highlighting that:

You rightly describe it as advisory. It's an important thing to have that connection to what's happening in the market. But I think what we typically see, whether it's governance boards, advisory committees or stakeholder groups, is this management of interests that could influence the advice. So, we're really looking for the thoughtfulness and process and understanding. It all comes to regulatory capture, all the time—that you're not captured by a sector or a person and then it influences how you administer your regulation.⁴¹

- 2.50 SIA informed the Committee that a review of the Advisory Council's terms of reference is underway, including a requirement to publish a list of all member declarations in the meeting papers.⁴² SIA did not provide a date as to when this review would be complete.

Committee comment

- 2.51 SIA's process for declaring and managing conflicts of interest has been deficient across its advisory, oversight and assurance bodies. This has the potential to undermine trust in the performance of SIA as the regulator of Australia's national anti-doping scheme.
- 2.52 Conflicts of interest can be actual, potential or perceived and as a regulatory body, SIA has an obligation to deal with these conflicts, whether through disclosures and their management, or through alternative arrangements to obtain required expertise.

³⁷ Mr Luke McCann, Deputy Chief Executive Officer, Strategy, International Policy and Corporate, SIA, *Committee Hansard*, 31 October 2025, p. 15.

³⁸ SIA, *Competition manipulation and sports wagering*, <https://www.sportintegrity.gov.au/what-we-do/competition-manipulation-and-sports-wagering> (accessed 28 January 2026).

³⁹ Mr Luke McCann, SIA, *Committee Hansard*, 31 October 2025, p. 15.

⁴⁰ Ms Rona Mellor PSM, Deputy Auditor-General, ANAO, *Committee Hansard*, 31 October 2025, p. 16.

⁴¹ Ms Rona Mellor PSM, ANAO, *Committee Hansard*, 31 October 2025, p. 16.

⁴² SIA, *Supplementary Submission 1.2*, p. 4.

- 2.53 The Committee questions the appropriateness of individuals with wagering-related interests serving on the Advisory Council. It is of the view relevant industry expertise in this area could be obtained through alternative mechanisms.

Gifts, benefits and sports-related hospitality

- 2.54 Accepting offers of gifts, benefits or hospitality can create conflicts of interest and pose risks to public confidence in entities, including public expectations of integrity, accountability, independence, transparency and professionalism.⁴³ This confidence can also be damaged when gifts and benefits are not properly declared.⁴⁴
- 2.55 The *PS Act* requires that APS employees and agency heads uphold the APS Values and Code of Conduct. Guidance issued by the APSC states that accepting a gift or benefit connected to an employee's employment can create a real or apparent conflict of interest that should be avoided.⁴⁵ Particular care should also be taken if the gifting organisation or individual is in a contractual or regulatory relationship with the agency.⁴⁶
- 2.56 There are also specific requirements and guidance for agency heads set out by the APSC. Agency heads must disclose, in a public register, any gift or benefit accepted with a value over \$100. Although not a requirement, there is a strong expectation that agency heads also publish gifts and benefits received by staff that exceed this threshold.⁴⁷
- 2.57 SIA has a managing an offer of a gift or benefit policy and procedure, updated in August 2024, which requires gifts and benefits to be 'carefully considered' before acceptance or rejection. Under the policy, all offers exceeding \$50, whether accepted or declined, must be declared in SIA's gifts and benefits register. Where possible, approval to accept the gift or benefit must be obtained by the deputy CEO or CEO before acceptance.⁴⁸
- 2.58 SIA publishes quarterly updates of the CEO's gifts and benefits disclosures in accordance with its policy and Australian Government requirements. The public register also includes accepted gifts to other officials exceeding \$100 in value.⁴⁹
- 2.59 Evidence uncovered in the audit suggests that SIA was not appropriately managing the risks of regulatory capture accruing from the acceptance of gifts and benefits.
- 2.60 The ANAO found SIA's documentation of gifts and benefits, including those from regulated sporting organisations, was inconsistent across both public reporting and

⁴³ ANAO, *Gifts, Benefits and Hospitality*, 29 October 2024, <https://www.anao.gov.au/work/insights/gifts-benefits-and-hospitality>.

⁴⁴ APSC, *Guidance for Agency Heads – Gifts and Benefits*, last updated 20 October 2023.

⁴⁵ APSC, *APS Values and Code of Conduct in Practice*, 22 May 2018, last updated 13 September 2021, <https://www.apsc.gov.au/publication/aps-values-and-code-conduct-practice>, p. 45.

⁴⁶ APSC, *APS Values and Code of Conduct in Practice*, p. 46.

⁴⁷ APSC, *Guidance for Agency Heads – Gifts and Benefits*, last updated 20 October 2023.

⁴⁸ ANAO, *SIA Audit*, paragraph 2.33.

⁴⁹ ANAO, *SIA Audit*, paragraph 2.40.

internal record-keeping. These weaknesses were evident at both the CEO level and across SIA officials more broadly.

- 2.61 SIA did not maintain comprehensive or accurate records of whether invitations or offers were accepted or declined by the CEO. While SIA's quarterly public disclosures recorded the acceptance of three gifts or benefits during the audit period, the ANAO's non-exhaustive review of email correspondence identified the CEO had received at least 22 invitations to sporting or sports-related events—none of which were documented in the public register. These invitations were received from organisations including World Athletics, the Australian Olympic Committee, ACT Brumbies, Football Australia and the Australian Rugby League Commission.⁵⁰
- 2.62 When asked, SIA advised that the current and former CEOs had not attended any major sporting events, games or competitions 'in performing their functions as CEO'.⁵¹ It is not clear whether tickets or hospitality may have been accepted in an unofficial capacity.
- 2.63 Internal registers for other officials were similarly incomplete. The ANAO identified instances where officials accepted gifts and benefits that were not recorded in the internal register, contrary to SIA policy requirements.⁵²
- 2.64 In the absence of accurate documentation or record-keeping, it is not possible to determine how many invitations were in fact received, and accepted, by the CEO and SIA officials more broadly.
- 2.65 SIA was not able to say how accepting tickets to attend sporting events was consistent with SIA's role as a regulator. When asked why SIA would accept sports-related hospitality, SIA stated its 'general practice' is not to accept gifts and benefits but acknowledged exceptions occur and henceforth reasons would be documented.⁵³
- 2.66 According to the ANAO, a clear guiding principle for officials to generally avoid the acceptance of gifts, benefits and hospitality, regardless of their value, can help remove doubt or misunderstanding, as well as 'set an appropriate tone' and promote a culture of integrity. To achieve this, an entity could communicate its position on gifts and benefits to its regulated entities to discourage gifts of any size being offered.⁵⁴
- 2.67 SIA has not formally communicated to the major sporting codes its position on accepting gifts or hospitality but agreed that it 'might be an opportunity'.⁵⁵
- 2.68 The benefits of such an approach were acknowledged by the ANAO as something that 'can change behaviour' of stakeholders. The ANAO put forward that formally communicating the lack of hospitality engagement:

⁵⁰ ANAO, *SIA Audit*, p. 37, paragraph 2.42.

⁵¹ SIA, *Supplementary Submission 1.1*, p. 2.

⁵² ANAO, *SIA Audit*, paragraph 2.43.

⁵³ Mr Luke McCann, SIA, *Committee Hansard*, 31 October 2025, p. 5.

⁵⁴ ANAO, *Gifts, Benefits and Hospitality*, 29 October 2024.

⁵⁵ Dr Sarah Benson PSM, SIA, *Committee Hansard*, 31 October 2025, p. 5.

...is something that we would encourage entities, particularly regulators, to think about: setting the tone of that engagement and documenting it. They tend to drop away, in terms of putting the risk in your court rather than in their own.⁵⁶

Committee comment

- 2.69 It is crucial that government regulators be above reproach when it comes to regulatory capture. This responsibility rests not only with SIA, but also for regulated entities. As a regulatory entity, it is vital that SIA has robust and watertight defences against regulatory capture. It is also the case the regulated population must be educated that it is not appropriate to offer gifts and benefits to the regulator.
- 2.70 The Committee considers transparency and proper documentation of integrity controls to be fundamental to managing regulatory capture risks. Regulators must foster a culture where interactions with regulated entities are consistently and appropriately managed and documented.
- 2.71 While SIA's internal processes must be robust to prevent any actual or perceived regulatory capture, SIA also has a responsibility to advise the sector of its position on such matters. It is important that preventive controls for managing gifts and benefits include the very clear principle that gifts and benefits of any value should not be accepted. If there are any exceptions, this must be clearly defined.
- 2.72 In August 2024, SIA introduced an online tool to automate conflict of interest and gift and benefit declarations. Officials are now required to declare whether gifts and benefits are accepted or declined. SIA advised that it gains assurance over the completeness and accuracy of the register through the generation of a quarterly report for review.⁵⁷ However, this approach does not in itself provide assurance that the register is complete and accurate, and that staff fully understand and comply with their obligations.

Recommendation 2

- 2.73 The Committee recommends that Sport Integrity Australia establishes a formal policy on the acceptance of gifts and benefits. The policy is to be actively communicated to all regulated individuals and entities and be published in a prominent position on the Sport Integrity Australia website. An update on this recommendation is to be provided to the Committee within six months.**

Outside employment

- 2.74 Engaging in outside employment may create a real or apparent conflict of interest.⁵⁸ Established best practice for managing outside employment requires that all parties

⁵⁶ Ms Rona Mellor PSM, ANAO, *Committee Hansard*, 31 October 2025, p. 6.

⁵⁷ SIA, *Supplementary Submission 1.2*, p. 2.

⁵⁸ APSC, *APS Values and Code of Conduct in Practice*, p. 49.

be aware of applicable obligations relating to declaring, assessing and managing conflict risks that arise from such employment. Ideally, agencies establish a specific policy for outside employment.⁵⁹

- 2.75 SIA has an outside employment policy that allows staff to engage in paid or unpaid outside employment and requires the employee to identify and disclose any real or apparent conflicts of interest. In addition to this and in accordance with WAD Code requirements, employees in anti-doping related roles are prohibited from undertaking management, executive or policy making roles within a broad definition of sport or entities involved in the organisation of events.⁶⁰
- 2.76 The policy requires employees to complete and submit a 'notification of outside employment form', which is then considered by a delegate. Only one formal outside employment notification form was submitted during the review period.⁶¹
- 2.77 The audit found SIA's outside employment policy had not been reviewed in line with its expected review date.⁶² It also found that while some conflicts of interest relating to outside employment were disclosed, compliance with the outside employment policy process was poor.
- 2.78 Multiple declarations of outside employment were made through conflict of interest forms—rather than the notification of outside employment form. Conflict of interest forms do not require the same detail as the notification of outside employment form, such as the nature of employment, actual and perceived conflicts arising from the employment, or delegate considerations in deciding whether to approve the arrangement.⁶³
- 2.79 All disclosed instances of outside employment were with regulated entities or within a sports-related occupation, and there was limited evidence of formal review or adequate management strategies in place.⁶⁴ For the four officials (two SES and two non-SES) who declared outside employment on a conflict of interest disclosure form, SIA advised that these staff did not work in operational anti-doping areas of SIA. The two SES declarations referred to both paid and unpaid roles.⁶⁵
- 2.80 When asked how it was ensuring formal review and management strategies were in place to address potential conflicts relating to outside employment, SIA did not identify any assurance mechanism. It did not describe how procedures had been strengthened or any substantive steps it had taken.⁶⁶

⁵⁹ APSC, *APS Conflict of Interest Management Framework: Better Practice Model*, 9 September 2025, <https://www.apsc.gov.au/conflict-interest/aps-better-practice-model>.

⁶⁰ SIA, *Supplementary Submission 1.1*, p. 3.

⁶¹ ANAO, *SIA Audit*, paragraphs 2.38–2.39.

⁶² ANAO, *SIA Audit*, paragraph 2.33.

⁶³ ANAO, *SIA Audit*, p. 36, paragraph 2.38.

⁶⁴ ANAO, *SIA Audit*, paragraphs 2.38–2.39.

⁶⁵ SIA, *Supplementary Submission 1.1*, p. 3.

⁶⁶ SIA, *Supplementary Submission 1.2*, p. 3.

Committee comment

- 2.81 Regulators must ensure that outside employment does not compromise integrity or create actual or perceived conflicts of interest. This requires clear policies, consistent documentation, and active oversight. SIA is responsible for ensuring that staff understand and comply with their obligations. Given that outside employment undertaken by SIA staff frequently involves sports-related roles, this further heightens the need for documented management and consideration of potential regulatory capture risks.



3. Management of the National Anti-Doping Scheme

Introduction

- 3.1 This chapter examines Sport Integrity Australia's (SIA) approach to preventing, detecting and responding to anti-doping rule violations through its management of Australia's National Anti-Doping Scheme. It focuses on inconsistencies in SIA's regulatory approach to user pays sports; its investigative framework and quality assurance practices; and the conduct of its investigations.

Prevention and detection of anti-doping violations

User pays and government funded testing arrangements

- 3.2 A key principle for regulatory activity is that it is risk based and data driven. This is emphasised in *RMG 128: Regulator Performance*, where best practice regulators take a risk-based approach informed by data, evidence and intelligence.¹
- 3.3 SIA is also required under the World Anti-Doping (WAD) Code and 2023 International Standard for Testing and Investigations (ISTI) to conduct effective and proportionate test planning that begins with a risk assessment informed by intelligence.²
- 3.4 SIA applies two funding models for anti-doping sample collection and analysis: government funded and partially cost-recovered 'user pays'. SIA has no documented criteria for determining which funding model applies to a sport. Instead, the designation is made in part according to a judgement as to a sport's capacity to pay for its own anti-doping testing.³
- 3.5 SIA maintains that user-pays arrangements do not provide sports with any additional access or benefit to SIA's services or change its regulatory approach compared to government-funded arrangements.⁴

¹ See: Department of Finance, *Regulator Performance (RMG 128): Principle 2 Risk based and data driven*, <https://www.finance.gov.au/government/managing-commonwealth-resources/regulator-performance-rmg-128/principle-2-risk-based-and-data-driven>.

² World Anti-Doping Agency (WADA), *International Standard for Testing and Investigations 2023 (ISTI 2023)*, articles 4.1 and 4.2.

³ Australian National Audit Office (ANAO), *Auditor-General Report No. 27 2024–25: Sport Integrity Australia's Management of the National Anti-Doping Scheme* (SIA Audit), 3 March 2025, paragraph 16.

⁴ Sport Integrity Australia (SIA), *Supplementary Submission 1.2*, p. 7.

- 3.6 SIA further contends that user-pays charging does not conflict with its obligations as a national anti-doping organisation. It told the Committee that its compliance with WAD Code and International Standards obligations was not a concern in its recent World Anti-Doping Agency (WADA) audit.⁵
- 3.7 However, SIA’s regulatory approach to preventing and detecting anti-doping violations differs between the two funding models in ways that have practical implications for how testing is planned, resourced and delivered.
- 3.8 The Australian National Audit Office (ANAO) concluded that SIA’s regulatory responsibilities were more effectively carried out for sports that received government-funded anti-doping testing.⁶ For sports under the user-pays model—Australian football (AFL), cricket, football (soccer), rugby league, rugby union and basketball—regulation was found to not be demonstrably risk based and data driven.⁷
- 3.9 Table 3.1 below summarises key differences between funding models in how SIA carried out its regulatory responsibilities, as identified by the ANAO, including across test distribution planning, risk assessments, testing pools, and overall engagement with national sporting organisations (NSO).

Table 3.1 SIA regulatory approach for sampled sports

Element of testing process	Government funded	User pays
Test distribution plan procedure	Procedure sets out roles and responsibilities for managing the process	No equivalent procedures developed
Total number of planned tests per year	Linked to SIA’s budgeted funding	Negotiated annually with NSOs through deeds of standing offer
Pre-moderation risk assessments (2022–23 and 2023–24)	All completed	Partially completed
Testing pools	65 athletes in registered pool, 96 in national pool, and 363 in domestic pool	No athletes in registered or national pools, and four athletes in domestic pool
Templates for sports-specific testing plans	Prepared annually for all sports in sample using a standard template	Prepared based on competition season using templates unique to that sport
Testing plans for 2023–24	NSOs not involved in planning the distribution of anti-doping tests	NSOs approved testing plan prior to a service order being established under existing contracts with SIA; number and type of samples determined

⁵ SIA, *Supplementary Submission 1.2*, pp. 6–7.

⁶ ANAO, *SIA Audit*, paragraph 8.

⁷ ANAO, *SIA Audit*, paragraph 8.

Element of testing process	Government funded	User pays
		through discussions with NSOs in reference to testing costs and risks
Testing plan alignment with Minimum Levels of Analysis (MLA)	Fully consistent with MLAs for 12 of 20 sports or disciplines	2 of 5 sampled sports were consistent with MLAs, 3 sports included planned testing for all types but not at minimum required level
Periods of testing	-	Periods of no-testing during off-season and pre-season for two sports. Out of competition testing conducted at scheduled training sessions, based on schedules provided by the NSO

Source: ANAO, *SIA Audit*, paragraphs 3.20, 3.44, 3.60, 3.66, 3.67, 3.71-3.74.

- 3.10 To address these inconsistencies, the ANAO made three recommendations to SIA. Specifically, that SIA:
- establish a procedure for the test distribution planning process for user-pays sports
 - establish a documented methodology for evaluating test distribution planning for government-funded and user-pays sports, and document outcomes from evaluations
 - undertake annual risk assessments to inform test distribution planning for all sports subject to regulation, including user-pays sports.⁸
- 3.11 SIA welcomed the ANAO's findings and agreed that there should not be 'stark differences' between the two funding models.⁹ It agreed to all recommendations and has since updated its test distribution plan procedure to include user-pays sports. User-pays sports are also now incorporated into the risk assessment for the 2025–26 test distribution plan process.¹⁰
- 3.12 In relation to the decision-making process determining which sports are treated as user pays, SIA advised that it has mapped the current process, with further refinement and documentation of the model planned.¹¹ No information was provided as to when this would be complete.
- 3.13 The Committee examined in greater detail some issues arising from SIA's regulatory practices in relation to user-pays sports. The sections below consider the implications for SIA's regulatory effectiveness of particular practices with regard to risk

⁸ ANAO, *SIA Audit*, p. 11.

⁹ Dr Sarah Benson PSM, Chief Executive Officer, SIA, *Committee Hansard*, 31 October 2025, p. 14.

¹⁰ SIA, *Submission 1*, p. 3.

¹¹ SIA, *Supplementary Submission 1.2*, p. 9.

assessments, test distribution plans, testing pools, and information provided by sports.

Risk assessments

- 3.14 Risk assessments and the resulting test distribution plan are the key tool through which SIA ensures its regulatory activities are risk-based and data driven.¹²
- 3.15 The ISTI sets out requirements for documenting, evaluating and updating risk assessments and establishes that effective and proportionate test planning begins with a risk assessment informed by intelligence.¹³ Risk assessments are considered the starting point of the test distribution plan.¹⁴
- 3.16 In 2022–23 and 2023–24, SIA completed a risk assessment for all government-funded sports in the ANAO’s sample.¹⁵ However, for user-pays sports, risk assessments were completed for two of five sports in 2022–23 (soccer and rugby union) and one of five sports in 2023–24 (soccer).¹⁶
- 3.17 In response to the identified shortcomings, SIA updated its documentation. SIA advised that it updated its test distribution planning procedure to include a requirement for user pays and government funded sports to be included in the same risk assessment. SIA stated the updated procedure ensured ‘consistency and robust documentation’.¹⁷
- 3.18 When the Committee asked for detail on the specific processes established to ensure that risk assessments are being completed, SIA confirmed it had included all sport disciplines in the documented risk assessment process, and conducted an annual review.¹⁸
- 3.19 In its evidence to the inquiry, the ANAO emphasised that simply producing documentation was not sufficient and that its recommendations were not just that SIA should write documents. Rather, the issue was using the documents ‘for the purpose of addressing risk and evaluating risk in each [regulatory] cycle’.¹⁹

Sport-specific testing plans

- 3.20 Test distribution plans determine SIA’s allocation, timing and type of anti-doping testing across sports and athletes, in accordance with the ISTI.

¹² SIA, *Supplementary Submission 1.2*, p. 7.

¹³ WADA, *ISTI 2023*, article 4.1

¹⁴ WADA, *ISTI 2023*, article 4.2.1.

¹⁵ ANAO, *SIA Audit*, paragraph 3.60.

¹⁶ ANAO, *SIA Audit*, paragraph 3.60.

¹⁷ SIA, *Supplementary Submission 1.2*, p.8.

¹⁸ SIA, *Supplementary Submission 1.5*, p. 1.

¹⁹ Ms Rona Mellor PSM, Deputy-Auditor General, ANAO, *Committee Hansard*, 31 October 2025, p. 8.

- 3.21 The ISTI also states that anti-doping organisations shall ensure that athlete support personnel²⁰ and any others with a conflict of interest are not involved in test distribution planning for their athletes or in the process of selecting athletes for testing.²¹
- 3.22 Although SIA advised that its updated procedure with regard to the test distribution planning procedure ensured ‘consistency’, it acknowledged there was a substantive difference in approach between user pays and government funded sports. For user pays sports, SIA is required to develop a testing proposal. The testing proposal is considered by the NSO and adopted prior to the services being provided under contract.²²
- 3.23 The ANAO found that the number and distribution of tests for user pays sports was negotiated with the sports. This was not consistent with the WAD Code principles or SIA’s responsibilities as a regulator of these sports.²³ Government funded sports do not have input into the allocation and distribution of anti-doping testing.²⁴
- 3.24 In 2023–24:
- the five user-pays sports approved the testing plan prior to a service order being established
 - the number and types of samples were determined through discussions with NSOs
 - only one of the testing plans was supported by a risk assessment.²⁵
- 3.25 Testing arrangements for user pays sports also did not fully cover the off- and pre-season.²⁶ During the audit, the ANAO found that SIA did not undertake anti-doping sample collection activities for periods during off- and pre-season for Australian football and rugby union.²⁷ SIA told the Committee it has since updated its agreements with those sports to ensure the 12 month period is covered.²⁸ However, regardless of the testing arrangement, SIA stated it always had the ability to ‘test anybody at any time’.²⁹
- 3.26 SIA also advised that as a ‘direct outcome’ from the audit, it has developed a standardised testing proposal template that explicitly states risk factors and proposal objectives. SIA stated that this template is the control used to ensure that discussions

²⁰ Athlete support personnel includes any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other person working with, treating or assisting an athlete in participating in or preparing for sports competition. See: WADA, *ISTI 2023*, p. 8.

²¹ WADA, *ISTI 2023*, article 4.1.2.

²² SIA, *Supplementary Submission 1.2*, p. 8.

²³ ANAO, *SIA Audit*, paragraph 10.

²⁴ ANAO, *SIA Audit*, paragraph 3.73.

²⁵ ANAO, *SIA Audit*, paragraph 3.73.

²⁶ ANAO, *SIA Audit*, p. 53.

²⁷ ANAO, *SIA Audit*, paragraph 3.84.

²⁸ Mr Chris Butler, Head of Anti-Doping Operations, SIA, *Committee Hansard*, 31 October 2025, p. 10.

²⁹ Mr Chris Butler, SIA, *Committee Hansard*, 31 October 2025, p. 10.

are risk based and data driven.³⁰ As to assurance mechanisms to ensure that the test distribution plans are risk-based, SIA noted that these include executive oversight and approval.³¹

Testing pools

- 3.27 While SIA maintains the authority to test any athlete at any time, athletes in the registered and national pools enable SIA to conduct its no-advance out of competition testing by placing whereabouts requirements on athletes. Testing pools also inform sport-specific testing plans, which consider pool composition when determining testing numbers and priorities.³²
- 3.28 SIA has three testing pools, provided for through the National Anti-Doping Policy and the ISTI³³:
- **Registered** – reserved for high performance athletes who are subject to the most rigorous anti-doping testing, with daily whereabouts requirements.
 - **National** – includes athletes who compete at a high level nationally or internationally and are subject to increased anti-doping testing, with fewer whereabouts requirements compared to the registered pool.
 - **Domestic** – athletes may be included based on certain criteria such as: participation in team-based sports; meeting one or more criteria for other pools but not included in them; competing at a national or state level; or being identified as emerging talent by their sport or SIA.³⁴
- 3.29 Athletes not in testing pools are not subject to whereabouts requirements. Despite having the authority to do so, statistics provided from 2022 indicate relatively few user pays athletes have been included in testing pools (see Table 3.2).³⁵

Table 3.2 Athletes in testing pools in audit sample (as of July 2024)

Pool	User pays sports	Government funded sports
Registered	-	65
National	-	96
Domestic	4	363

Source: ANAO, SIA Audit, paragraph 3.66.

³⁰ SIA, *Supplementary Submission 1.5*, p. 2.

³¹ SIA, *Supplementary Submission 1.5*, p. 2.

³² ANAO, *SIA Audit*, paragraphs 3.65 and 3.68.

³³ See: SIA, National Anti-Doping Policy, article 5 and WADA, *ISTI 2023*, subsection 4.8.4.

³⁴ SIA, *Testing Pools*, www.sportintegrity.gov.au/what-we-do/anti-doping/athlete-testing/testing-pools (accessed 28 November 2025).

³⁵ ANAO, *SIA Audit*, paragraphs 3.66 to 3.67.

- 3.30 SIA states the pools allow SIA to locate and test athletes 'in a proportionate response'.³⁶ The whereabouts requirements are described by SIA as 'burdensome' and not required for user pays sports because they:
- ... have easy to find locations. We know where they're training. The sport is required to provide us those details as part of the contractual arrangements.³⁷
- 3.31 SIA confirmed out of competition testing of user pays sports is undertaken at scheduled training sessions, based on schedules provided by the sports. SIA viewed this arrangement as suitable.³⁸
- 3.32 Upon further examination from the Committee as to why there were so few athletes from user pays sports in testing pools, SIA stated that it receives training information and details of athletes movements during the offseason directly from the client – removing the need for athletes to be included in a pool.³⁹ The frequency of updates from user pays sports on training schedules and athlete locations 'depends on the sport and club'. SIA requires the provision of accurate information shared in advance and without prompt, with consequences for NSOs where a failed attempt at testing occurs due to inaccurate information.⁴⁰

Lists of athletes for testing

- 3.33 The ISTI sets out that anti-doping organisations are to ensure that they are able to obtain, assess and process anti-doping intelligence from all available sources. This enables anti-doping organisations to: help deter and detect doping; inform the development of an effective, intelligent and appropriate test distribution plan; plan target testing; and conduct investigations.⁴¹
- 3.34 The ISTI further requires that anti-doping organisations assess all anti-doping intelligence for relevance, reliability and accuracy, taking into account the nature of the source and circumstances in which the intelligence has been captured or received.⁴²
- 3.35 The list of factors that anti-doping organisations should consider when assessing athletes for targeted testing are set out in the ISTI. While not limited to these factors, the list includes:
- prior anti-doping rule violations, test history, including any abnormal biological parameters
 - sport performance history, performance pattern, and/or high performance without commensurate test record

³⁶ Mr Chris Butler, SIA, *Committee Hansard*, 31 October 2025, p. 10.

³⁷ Mr Chris Butler, SIA, *Committee Hansard*, 31 October 2025, p. 10.

³⁸ ANAO, *SIA Audit*, paragraph 3.67.

³⁹ SIA, *Supplementary Submission 1.5*, p. 3.

⁴⁰ SIA, *Supplementary Submission 1.5*, p. 3.

⁴¹ WADA, *ISTI 2023*, article 11.1.

⁴² WADA, *ISTI 2023*, article 11.3.1.

- repeated failure to meet whereabouts requirements
- suspicious whereabouts patterns (for example, last minute updates of whereabouts information)
- moving to or training in a remote location
- withdrawal or absence from expected competition(s)
- association with a third party (such as team-mate, coach or doctor) with a history of involvement in doping
- injury
- age/stage of career (for instance, move from junior to senior level, nearing end of contract, approaching retirement)
- financial incentives for improved performance, such as prize money or sponsorship opportunities
- reliable information from a third party, or intelligence developed by or shared with the anti-doping organisation.⁴³

3.36 SIA advised that it works closely with both government funded and user pays sports to actively seek input regarding which athletes should be considered for testing. Since 2022, of user pays sports, the AFL and NRL have provided information to SIA in the form of lists of athletes.⁴⁴

3.37 According to SIA, the process operates as follows:

- SIA works with NSOs to identify athlete risk factors relevant in determining who to test
- NSOs provide names on a list for consideration
- SIA reviews the names against its internal data and intelligence holdings
- SIA decides who is placed in a testing pool or identified as suitable for testing.⁴⁵

3.38 Tables 3.3 and 3.4 provide an overview of the AFL and NRL lists provided between 2022 and 2024, including how many athletes were tested from provided lists and how many were tested more than once.

Table 3.3 AFL target list (2022 to 2024)

Measure	2022	2023	2024
Number of athletes on list provided	95	37	51
Number of athletes tested from list	36 (38%)	22 (59%)	50 (98%)

⁴³ SIA, *Supplementary Submission 1.1*, p. 6.

⁴⁴ SIA, *Supplementary Submission 1.1*, p. 4.

⁴⁵ SIA, *Supplementary Submission 1.3*, p. 22.

Number of athletes tested more than once*	1	2	13
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Source: SIA, *Submission 1.3*, p. 4.

* These figures refer to multiple tests on athletes included on the list (not multiple tests on all athletes in the sport that year)

Table 3.4 NRL target list (2022 to 2024)

Measure	2022	2023	2024
Number of athletes on list provided	Not provided	31	178
Number of athletes tested from list	Not provided	18 (58%)	108 (61%)
Number of athletes tested more than once*	Not provided	2	14

Source: SIA, *Submission 1.3*

* These figures refer to multiple tests on athletes included on the list (not multiple tests on all athletes in the sport that year)

- 3.39 Neither the lists themselves, nor the documentation supporting the inclusion of athletes on lists, were consistent. For the 2023–24 season, the ANAO found the AFL’s list did not include reasons for targeting, that is, what risk factor might justify the targeting of a particular athlete.⁴⁶ SIA confirmed that the 51 athletes put forward by the AFL were all assessed through its usual process when considering target testing, guided by the ISTI factors.⁴⁷
- 3.40 SIA later confirmed that previous lists provided by the AFL contained ‘some rationale’ for athlete inclusion, including performance output improvements or decreases, contractual changes, and known associations presenting an integrity risk to sport.⁴⁸
- 3.41 During the audit, the ANAO located lists only from the AFL, advising the Committee that in the documents it saw during the course of the audit, ‘we did not see the same level of steerage towards particular athletes’ from other sports.⁴⁹
- 3.42 SIA stated that the NRL provided some information attached to its lists, specifically, contract information.⁵⁰ SIA advised ‘they [NRL] only consider one risk factor in providing their list of names ... the AFL may consider more’, but do not provide any additional information. SIA confirmed that ‘there’s a difference in the basis on which different professional sports provide lists to us’.⁵¹
- 3.43 During the hearing, the ANAO reiterated a key principle for effective regulation is having a data-driven and risk-based approach. When it conducted the audit, the

⁴⁶ ANAO, *SIA Audit*, paragraph 3.73.

⁴⁷ SIA, *Supplementary Submission 1.1*, p. 6.

⁴⁸ SIA, *Supplementary Submission 1.4*, p. 3.

⁴⁹ Ms Christine Chalmers, Executive Director, ANAO, *Committee Hansard*, 12 December 2025, p. 5.

⁵⁰ Mr Chris Butler, SIA, *Committee Hansard*, 12 December 2025, p. 5.

⁵¹ Dr Sarah Benson PSM, SIA, *Committee Hansard*, 12 December 2025, p. 11.

ANAO looked for clearly documented frameworks to assess risk, and consistent use of information, data and intelligence, which can include lists from sporting codes.

- 3.44 The ANAO examined how data, information and intelligence were applied in a structured way and according to frameworks. It found 'opportunities to further strengthen that risk based approach to regulation and to ensure that there's consistency across the different types of sporting codes—user pays and the government funded codes'.⁵² The audit itself found SIA's arrangements for preventing and detecting doping were only partly effective for the major professional sports that have mainly user pays arrangements 'due to the way SIA has chosen to administer' the user pays arrangements.⁵³
- 3.45 Between 2023 and 2024, the number of athletes on the NRL's list increased by 474 per cent. As to what accounted for this substantial increase, SIA advised that the risk factors did not change, and that the increase was attributed to SIA actively seeking and requesting a list of athletes who were currently on the last year of their current contract. This had previously been sought by SIA through open-source information.⁵⁴
- 3.46 Although SIA facilitates discussions with sports about relevant risk-factors and actively encourages the provision of this information, the response from sports is variable. For user pays sports, SIA confirmed that over the past three years, it did not hold 'any record of an individual athlete' being put forward for testing during discussions between SIA and Basketball, Cricket, Football and Rugby Union.⁵⁵
- 3.47 The ANAO stated that because risk assessments were not consistently completed for user pays sports, it was difficult to answer the question 'why target certain people, even if the Code brings them forward?'.⁵⁶ When the ANAO conducted the audit, it could not see 'any relationship between the selection [of an athlete for testing] and the risk', which was a risk itself as it 'brings with it the optic of capture by the user pay sports ... part of the risk ... is the optic that the names that are given are low risk ... the optic is that you're being fed information potentially that takes you away from where the high risk is'. The ANAO stated that it was also possible the names were high risk, and that the absence of a rationale for selection of athletes was also a risk to SIA.⁵⁷
- 3.48 According to SIA, NSO's are considered 'reliable third parties' under ISTI criteria.⁵⁸ In particular, user pays sports are considered to have better resources to understand their anti-doping environment and the risks to the integrity of their sport. SIA told the Committee that it:

...doesn't want to go out and just randomly select any athlete for testing because it is not intelligence informed, it's not risk informed. So we do quite deliberately

⁵² Ms Christine Chalmers, ANAO, *Committee Hansard*, 12 December 2025, p. 12.

⁵³ ANAO, *SIA Audit*, paragraph 10.

⁵⁴ SIA, *Supplementary Submission 1.5*, p. 4.

⁵⁵ SIA, *Supplementary Submission 1.4*, p. 2.

⁵⁶ Ms Rona Mellor PSM, ANAO, *Committee Hansard*, 31 October 2025, p. 12.

⁵⁷ Ms Rona Mellor PSM, ANAO, *Committee Hansard*, 31 October 2025, pp. 12–13.

⁵⁸ SIA, *Supplementary Submission 1.2*, p. 22.

receive them from any sport, whether they're user-pay or government funded. We want to know about their sport, what they understand about the risk environment.⁵⁹

- 3.49 As to what documented assurance processes SIA has in place to ensure that the information provided from the sports in the form of lists is reliable and risk-based, SIA only stated that that the assurance process is now documented in the developing the test distribution plan procedure. This process states that SIA will 'critically review internal holdings' in conjunction with open-source information when assessing the lists provided by sports.⁶⁰

Investigating and responding to anti-doping rule violations

- 3.50 SIA is responsible for investigating suspected violations of Australia's national-anti-doping rules. These investigations are guided by the Australian Government Investigations Standard (AGIS), which sets out the minimum standards for Australian Government entities conducting investigations. The AGIS was released in 2011 and updated in October 2022.⁶¹
- 3.51 The ANAO examined whether SIA had established effective arrangements to investigate and respond to anti-doping rule violations and found:
- a partly fit for purpose procedural framework for investigations, including for quality assurance
 - irregularities in the triage and conduct of investigations when compared to the procedures
 - investigations that did not consistently meet timeliness targets as set out on the WAD Code.⁶²
- 3.52 The ANAO recommended that SIA either establish controls to ensure that SIA's documented investigative practices and procedures were implemented, or update these to reflect current endorsed practice. It also recommended SIA implement a quality assurance process that captured all types of investigations.⁶³
- 3.53 In relation to the conduct of investigations, the ANAO identified an opportunity for improvement relating to documenting procedures for dealing with adverse analytical finding cases involving substances of abuse, and for dealing with non-analytical finding cases.⁶⁴

⁵⁹ Mr Chris Butler, SIA, *Committee Hansard*, 31 October 2025, p. 11.

⁶⁰ SIA, *Supplementary Submission 1.5*, p. 4.

⁶¹ Australian Government, *Australian Government Investigations Standard (AGIS)*, October 2022.

⁶² ANAO, *SIA Audit*, paragraph 11.

⁶³ ANAO, *SIA Audit*, pp. 11–12.

⁶⁴ ANAO, *SIA Audit*, paragraph 4.30.

3.54 This section addresses key issues identified by the Committee: the alignment of the investigations framework with the AGIS; quality assurance practices; and SIA’s compliance with its own procedures for conducting investigations.

Investigations framework

Alignment with the AGIS

3.55 At the time of the audit, SIA’s investigations manual, established in 2020, had not been updated to align with the AGIS 2022.⁶⁵ While the AGIS 2022 does not prescribe a specific timeframe for updates, entities are expected to proactively implement changes and prioritise actions and requirements to meet the standard where possible, and in a reasonable timeframe.⁶⁶

3.56 SIA’s self-assessment of its compliance with the AGIS 2022 requirements found that:

- policies, procedures or templates were in place for 21 of 113 AGIS 2022 requirements
- there were no policies, procedures or templates for one requirement
- it was unsure how to assess one requirement
- 89 requirements were not assessed.⁶⁷

3.57 Table 3.5 provides a summary ANAO’s assessment of selected AGIS 2022 requirements across key operational elements and SIA practices. While some appropriate practices were observed, the table identifies gaps between documented procedures and actual practice.

Table 3.5 Selected elements of ANAO assessment against the AGIS 2022

AGIS 2022 elements	ANAO assessment
<p>Disclosure management and information sharing</p> <p>The AGIS recommends having regard to relevant legislation and obtaining legal advice, documenting responsibilities and establishing recordkeeping procedures for investigation information and disclosure material.</p> <p>The AGIS recommends that entities have procedures in place for receiving, responding, and requesting information from other entities, and collaborating across government and jurisdictional boundaries.</p>	<ul style="list-style-type: none"> - Investigations manual and procedures include consideration of Privacy Act, Sport Integrity Australia Act and its regulations - Six instances where SIA disclosed protected information - Five were to Minister for Sport, and officials sought internal legal advice to support disclosure - One disclosure related to individual investigation and made to another organisation; internal legal advice sought but described as ‘preliminary’ and ‘inconclusive’,

⁶⁵ ANAO, *SIA Audit*, paragraph 4.4

⁶⁶ Attorney-General’s Department, *Australian Government Investigations Standards*, 7 November 2011, <https://www.ag.gov.au/integrity/publications/australian-government-investigations-standards>.

⁶⁷ ANAO, *SIA Audit*, paragraph 4.4

AGIS 2022 elements	ANAO assessment
Information sharing must be in accordance with the <i>Privacy Act 1988</i> (Privacy Act) and any secrecy provisions within legislation that may govern information sharing.	noting potential risk for non-compliance with SIA Act.
<p>Electronic investigation management system</p> <p>Entities must establish an electronic investigation management system to record, collate and manage investigations. There are also specific system capability requirements.</p>	<ul style="list-style-type: none"> - Although there is an electronic investigations management system, case outcomes and timeliness cannot be readily determined due to inconsistent data entry in SIA's case management tool or system limitations.
<p>Security clearance</p> <p>Entities are required to identify and assign security clearance requirements against investigator roles / positions proportionate with access to classified information and handling of investigation material.</p>	<ul style="list-style-type: none"> - Investigations manual requires investigations staff to hold a negative vetting one security clearance - Position descriptions for executive and lower-level staff in anti-doping investigations indicated that requirement was baseline vetting.
<p>Qualifications</p> <p>The AGIS 2022 strengthened requirements on investigator qualifications by making minimum vocational qualifications mandatory.</p> <ul style="list-style-type: none"> - A vocational and educational training (VET) qualification must be obtained, unless another qualification or internal training is determined as equivalent. - Entities must document the required VET accredited qualification/s (or equivalency) to conduct particular types of investigations and the timeframe in which investigators should obtain the qualification. 	<ul style="list-style-type: none"> - Variance in qualification requirements for executive level and lower-level staff - No established documentation of qualifications of investigations staff, but SIA advised staff had appropriate qualifications or were in the process of obtaining appropriate qualifications.
<p>Evidence and exhibit handling</p> <p>The AGIS 2022 requires entities to conduct quarterly and annual audits of evidence holdings and have a procedure for the auditing of full evidence holdings.</p>	<ul style="list-style-type: none"> - Audit procedures in investigations manual require an annual stock take of full evidence holdings. Since 1 July 2021, only one audit has been conducted.
<p>Risk management</p> <p>The AGIS 2011 states that agencies should ensure risk management is incorporated in decision making throughout an investigation. The AGIS 2022 states that entities should establish a risk management framework for investigations.</p>	<ul style="list-style-type: none"> - While SIA had established a case categorisation and prioritisation model, it had not used this since 2020 and it had been replaced with 'approach papers' - The approach paper process has since been discontinued - SIA advised that the prioritisation of one case over another is not applicable to SIA's

AGIS 2022 elements	ANAO assessment
<p>Decision-making</p> <p>The AGIS 2022 states that entities should have a decision-making process in place for investigations involving options and actions that can be explained, justified, and documented.</p>	<p>operations, as SIA is required under the WAD Code to progress all adverse analytical findings.</p> <p>- Some procedures in investigations manual, including case review, preparation of critical decision records and task allocation in the case management system, are no longer practiced.</p>

Source: ANAO, *SIA Audit*, pp. 66–70.

3.58 When questioned on the lack of alignment with the AGIS, SIA explained that its documented procedures did not reflect its evolving practice:

We'd taken on board the AGIS that came into effect in late 2022, and we were refining, over time, our practices. Since then, we've documented those practices and also done a fresh review, or a contemporary review, against the standard to make sure that we were in alignment.⁶⁸

3.59 The audit found that despite providing information to the ANAO in July 2024 that it had not assessed compliance with 89 AGIS 2022 requirements, SIA's website in September 2024 stated that its investigations were conducted in accordance with the AGIS 2022.⁶⁹ In response to the Committee's questioning on this issue, SIA stated the practices in place were compliant, but that 'they weren't documented and reflected as compliant'. SIA acknowledged that the information on its website should be an accurate reflection of internal practices.⁷⁰

3.60 SIA made a number of statements regarding the shortcomings identified in the audit, including:

- it had updated procedures and guidelines to ensure documented practices and procedures are consistent with current practice⁷¹
- SIA's current standard operating procedures provide general investigation standards and principles 'derived' from the AGIS⁷²
- a checklist has been developed to map alignment of processes with the AGIS 2022.⁷³

⁶⁸ Dr Sarah Benson PSM, SIA, *Committee Hansard*, 31 October 2025, p. 8.

⁶⁹ ANAO, *SIA Audit*, paragraph 4.4

⁷⁰ Dr Sarah Benson PSM, SIA, *Committee Hansard*, p. 8.

⁷¹ SIA, *Submission 1*, p. 3.

⁷² SIA, *Supplementary Submission 1.2*, p. 11.

⁷³ SIA, *Supplementary Submission 1.2*, p. 11.

- 3.61 Assurance of alignment of SIA processes and procedures with the AGIS 2022 would occur through SIA's quality assurance policy that had been drafted but was awaiting external review (see below), the timeframe for which was not stated.⁷⁴

Quality assurance practices

- 3.62 The AGIS requires entities to make quality assurance a priority and introduces informal and formal processes to ensure continual improvement, including a requirement for entities to have an investigations quality assurance policy in place that includes quality assurance activities.⁷⁵ The AGIS includes a better practice element of at least one formal external quality assurance activity every two years.⁷⁶
- 3.63 The ANAO found that SIA's quality assurance processes for investigations have largely not been established.⁷⁷
- 3.64 There have been delays in implementing and finalising quality assurance activities. For example, while the SIA's predecessor, the Australian Sports Anti-Doping Authority (ASADA) had established a quality assurance review procedure for investigations in 2020, SIA advised in June 2024 that it had not been implemented.⁷⁸
- 3.65 The ANAO also found inconsistencies between SIA's documented processes and actual practice for investigations review and investigation closure reporting. This included weekly team meetings to discuss the status of cases where minutes were not taken, and investigation closure templates that were inconsistently prepared and did not document lessons learned or recommendations.⁷⁹
- 3.66 The ANAO recommended that SIA implement a quality assurance process for investigations that captures all types of investigations.⁸⁰ In response, SIA advised that it has formal quality assurance review processes in place through internal peer and supervisory review, as described in the AGIS.⁸¹ SIA stated that it would document its internal practices and implement external processes in line with AGIS best practice.⁸²
- 3.67 On a practical level, SIA has drafted an operational quality assurance policy and is seeking external review to ensure alignment with the AGIS. The draft policy includes: an additional informal internal review activity; independent internal audit; and

⁷⁴ SIA, *Supplementary Submission 1.2*, pp. 11–12.

⁷⁵ ANAO, *SIA Audit*, paragraph 4.11.

⁷⁶ Australian Government, *AGIS 2022*, October 2022, p. 16.

⁷⁷ ANAO, *SIA Audit*, p. 10.

⁷⁸ SIA assumed responsibility for sport integrity functions that were being undertaken by the Department of Health's National Integrity of Sport and the Australian Sports Anti-Doping Authority (ASADA). ANAO, *SIA Audit*, paragraphs 1.4 and 4.12.

⁷⁹ ANAO, *SIA Audit*, paragraphs 4.13–4.15.

⁸⁰ ANAO, *SIA Audit*, paragraph 4.16.

⁸¹ ANAO, *SIA Audit*, paragraph 4.17.

⁸² ANAO, *SIA Audit*, paragraph 4.17.

independent external audit activity to be completed at least every two years. SIA did not indicate a timeframe for completion or implementation of this policy.⁸³

Conduct of investigations

- 3.68 In addition to examining SIA's investigation and quality assurance processes and frameworks, the ANAO also looked at how investigations were conducted.
- 3.69 The AGIS sets clear expectations across the investigation lifecycle, including:
- establishing criteria for when an investigation is considered to be commenced and finalised
 - ensuring an investigation is a documented process from commencement to finalisation, including context and rationale
 - investigations should commence with an overall planning process and where possible result in a written investigation plan that is referred to and updated
 - investigations must be conducted in a manner consistent with applicable laws, particularly regarding collection, handling, and presentation of evidence and application of powers
 - briefs of evidence should be prepared to a standard that will maximise the possibility of success in criminal, civil penalty, civil, administrative or disciplinary proceedings.⁸⁴
- 3.70 SIA's arrangements to investigate and respond to anti-doping rule violations were found to be partly effective. The ANAO observed irregularities in the triage and conduct of 38 investigations commenced in the three years to 30 June 2024, when compared to SIA's existing procedures.⁸⁵
- 3.71 SIA's investigations of possible anti-doping rule violations are grouped into four categories: adverse analytical findings (AAF), presumptive adverse analytical findings (PAAF), atypical findings (ATF) and non-analytical findings. The non-analytical finding category was established by SIA.⁸⁶ SIA has also established a separate process for AAF cases involving substances of abuse.⁸⁷
- 3.72 The ANAO considered that SIA could better document its procedures for dealing with AAF cases (substance of abuse), and for dealing with non-analytical findings. For example, it found that SIA had not clearly established criteria for when AAF cases involving substances of abuse or non-analytical findings cases are considered to be

⁸³ SIA, *Supplementary Submission 1.2*, p. 12.

⁸⁴ See: ANAO, *SIA Audit*, paragraphs 4.24, 4.32, 4.44, 4.37, 4.44 and 4.46.

⁸⁵ ANAO, *SIA Audit*, paragraph. 11.

⁸⁶ ANAO, *SIA Audit*, paragraph 4.19.

⁸⁷ ANAO, *SIA Audit*, paragraph 4.24.

commenced.⁸⁸ For non-analytical findings cases, there was a lack of documented procedure and inconsistent treatment of cases.⁸⁹

- 3.73 Further, for AAF cases (substance of abuse), the roles of the legal and investigations sections had not been documented in a standard operating procedure. In the case of non-analytical findings cases, elements of SIA’s practices were not included in the investigations manual or documented elsewhere.⁹⁰
- 3.74 In relation to cases recorded in SIA’s case management system between 1 July 2021 and 30 June 2024, documented procedures were followed for commencing all AAF cases. However, treatment for commencing non-analytical findings cases was inconsistent. There was no documented decision-making for one case; and another was based on email correspondence without an approach paper or Operations Committee consideration.⁹¹
- 3.75 Between 1 July 2021 and 30 June 2024, 38 anti-doping rule violation cases recorded in SIA’s case management system progressed to the investigations section.⁹² The ANAO examined records for these cases to determine whether key activities were performed and documented in alignment with the AGIS and SIA requirements.⁹³

Table 3.6 SIA's investigation metrics 1 July 2021 - 30 June 2024

Key activity	Detail
Investigation planning	<ul style="list-style-type: none"> - Investigation plans developed for 32 of 38 investigations - 15 of 32 included required elements and authorisation - 17 of 32 not developed according to requirements - Of 6 investigations with no plan, five had no documented decision for not developing plan
Application of investigative powers	<ul style="list-style-type: none"> - Disclosure notice procedure does not consistently align with the requirements under the SIA Act - Penalties for non-compliance with disclosure notices not consistently issued - 8 of 16 athletes did not comply with disclosure notices and no penalties were issued - In November 2022, SIA developed a record of service template and an affidavit of service template, affidavit of service template had not been implemented
Briefs of evidence	<ul style="list-style-type: none"> - Of the 23 completed briefs of evidence adjudication, 19 addressed all the required evidence and were appropriately authorised

⁸⁸ ANAO, *SIA Audit*, paragraph 4.24.

⁸⁹ ANAO, *SIA Audit*, p. 64.

⁹⁰ ANAO, *SIA Audit*, paragraph 4.24.

⁹¹ ANAO, *SIA Audit*, paragraph 4.25.

⁹² ANAO, *SIA Audit*, paragraph 4.31.

⁹³ ANAO, *SIA Audit*, paragraph 4.33.

Key activity	Detail
Investigation closure	- Closure reports not consistently completed

Source: ANAO, *SIA Audit*, pp. 82–85.

- 3.76 These findings indicate areas for improvement in SIA’s investigations processes and overall approach to investigations, including commencement criteria, documentation practices, and aspects of planning and decision-making.

Assessment of allegations relating to AFL officials

- 3.77 The audit also drew attention to a particular instance where SIA handled specific allegations of possible anti-doping rule violations committed by AFL officials.
- 3.78 In March 2024, allegations referenced in Parliament were received by SIA relating to possible anti-doping rule violations committed by officials of the AFL, including evading sample collection, impeding or tampering with the doping control process, and complicity to violate aspects of the WAD Code. Rather than treating the allegations as a non-analytical finding and proceeding with an investigation, SIA prepared an ‘assessment plan’, which was identical to the investigation plan template.⁹⁴ This assessment was later published on its website.⁹⁵
- 3.79 The ANAO made the following observations with regard to SIA’s actions:
- assessments were not defined in the investigations manual or any other procedural document
 - the allegations were not entered into the case management system
 - the evidence matrix in the assessment plan was incomplete
 - no approach paper was prepared for endorsement at the Operations Committee
 - there was no documentation for the rationale for conducting an assessment rather than treating the allegations as a non-analytical finding and proceeding with an investigation
 - SIA was unaware of any other instances where allegations of possible anti-doping rule violations were ‘assessed’ rather than investigated.⁹⁶
- 3.80 In response to the Committee’s request for a rationale, SIA claimed that it ‘did not deviate’ from its standard investigation process but accepted that information received was not triaged in the same manner as other intelligence, nor all decision-making documented. SIA did not sufficiently explain why this had occurred.⁹⁷

⁹⁴ ANAO, *SIA Audit*, paragraphs 4.28–4.29.

⁹⁵ SIA, *Sport Integrity Australia assessment of allegations regarding the Australian Football League’s Illicit Drug Policy*, June 2024.

⁹⁶ ANAO, *SIA Audit*, paragraph 4.29.

⁹⁷ SIA, *Supplementary Submission 1.3*, p. 1.

- 3.81 SIA stated that the ANAO report suggested the allegations had not been entered into the case management system. SIA stated the first entry into the case management system was an incident report based on media reporting on 27 March 2024, and a generic case was subsequently created on 3 April 2024.⁹⁸

Committee comment

- 3.82 SIA was established in part to prevent and address threats to sports integrity—effective anti-doping measures are essential to protect the integrity of Australian sport. The ANAO found anti-doping prevention and detection was largely effective for government funded sports, but partly effective for user pays sports, and that SIA's arrangements to investigate and respond to anti-doping rule violations were partly effective. If SIA is to function as an effective regulator, there is work to do to ensure the integrity of Australian sport is protected for the benefit of the entire Australian community.
- 3.83 SIA has chosen to administer user pays and government funded sports differently. The ANAO found for user pays sports, test distribution planning was not demonstrably risk-based. The number and distribution of tests was negotiated with national sporting organisations under a service agreement, a practice the ANAO found is inconsistent with World Anti-Doping Code principles and SIA's responsibilities as a regulator.
- 3.84 While SIA has advised it has updated its documentation to require user pays and government funded sports to be included in the same risk assessment, the Committee remains concerned by two issues that go to the substance of SIA's recently updated risk-based approach: the number and distribution of tests are negotiated with the user pays national sporting organisations under a service agreement; and the status of lists of athletes provided by national sporting organisations.
- 3.85 A model where the regulated population has a role in influencing the extent of the regulation carries inherent risks, particularly when key measures such as risk assessments are not completed. Conducting services under contract is not necessarily problematic, depending on the manner in which this occurs. In this case, the Committee cannot be confident that the number and distribution of tests for user pays national sporting organisations is determined on the basis of risk rather than other considerations, such as cost.
- 3.86 A similar issue of risk applies to the lists provided by some national sporting organisations, which differed in their extent, quality and detail. In the absence of a robust risk-based approach, it is unclear on what basis these lists might be assessed as intelligence to inform test distribution planning. During the audit, the ANAO could not find a relationship between the selection of certain athletes for testing and risk. Without a robust risk-based approach there could be a perception of regulatory

⁹⁸ SIA, *Supplementary Submission 1.3*, p. 1.

capture or unequal treatment. The Committee is of the view there must be a more robust approach to lists of athletes.

Recommendation 3

- 3.87 The Committee recommends that Sport Integrity Australia establishes a template for athlete lists provided by regulated entities that includes at a minimum the risk factors set out in the International Standard for Testing and Investigations. Sport Integrity Australia should make providing information in this format a requirement under contractual or other formal arrangements with national sporting organisations.**
- 3.88 In response to the findings around risk, SIA was able to point out that it had updated its documentation and would gain assurance that a risk-based approach was followed through the developing the test distribution plan procedure document. However, as noted by the ANAO, simply producing documentation is not sufficient—the documents must be used for the purpose of addressing and evaluating risk in each regulatory cycle. The mere presence of documents does not ensure regulation is data-driven and risk-based. It is not clear how SIA will use these documents.
- 3.89 What was clear to the Committee, however, was the reticence of SIA to acknowledge there were any substantive differences between how it administered government funded and user pays sports. SIA told the Committee initially that user pays arrangements did not provide sports with any additional access or benefit to SIA’s services, or change its regulatory approach, notwithstanding the finding of the audit that SIA chooses to administer user pays arrangements differently. SIA later acknowledged there was a ‘substantive difference’ relating to the requirement that a testing proposal be adopted by user pays sports.
- 3.90 Similar ambiguities were contained in other evidence presented to the Committee. When asked about the attendance of SIA chief executives at sporting events (discussed in chapter 2), SIA responded that the current and former chief executives had not attended major sporting events ‘in performing their functions as CEO’. The phrasing here is at best vague as to whether event invitations were accepted for attendance in a private capacity.
- 3.91 Further, the Committee asked whether other user pays sports (beyond AFL and Rugby League) had provided names of individual athletes during meetings with SIA. SIA stated it ‘does not hold any record’ of this occurring during discussions between these sports and the anti-doping testing team. The answer leaves a question as to whether individual athletes may have been named but not recorded by SIA, or whether names might have been provided to officials outside the anti-doping testing team.
- 3.92 And finally, SIA’s position on whether its investigations were compliant with the AGIS standards was unclear—SIA stated its practices were compliant but not documented or reflected as compliant. The audit had found SIA’s own self-assessment of its compliance with the AGIS 2022 was not complete.

- 3.93 The Committee reminds entities of its expectation that evidence provided will be accurate and not misdirect or mislead the Committee, whether intentionally or otherwise.
- 3.94 In closing, the Committee notes that regulation protects the public interest, and when deficiencies are found in regulatory performance, it can be difficult for the Parliament and the public at large to have confidence that government regulatory institutions are effective. Regulators must be beyond reproach, something that at a minimum requires that they have in place policies and procedures pursuant to their statutory regulatory obligations and that they comply with them.

Mr Josh Burns MP
Chair



A. Submissions

- 1** Sport Integrity Australia
 - 1.1 Supplementary to submission 1
 - 1.2 Supplementary to submission 1
 - 1.3 Supplementary to submission 1
 - 1.4 Supplementary to submission 1
 - 1.5 Supplementary to submission 1
- 2** Curling Australia
- 3** Brisbane Organising Committee for the 2032 Olympic and Paralympic Games
- 4** The Front Campaign
- 5** Mr Peter Upham
- 6** Combat Sports Commission



B. Public hearings

Friday 31 October 2025

Committee Room 2R1
Parliament House, Canberra

Sport Integrity Australia

- Dr Sarah Benson PSM, Chief Executive Officer
- Mr Luke McCann, Deputy Chief Executive Officer, Strategy, International Policy & Corporate
- Mr Chris Butler, Head of Anti-Doping Operations

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

- Mr Travis Haslam, First Assistant Secretary
- Mr David Mackay, Deputy Secretary

Australian National Audit Office

- Ms Rona Mellor PSM, Deputy Auditor-General
- Ms Peta Lane, Group Executive Director, Performance Audit Services Group
- Ms Christine Chalmers, Executive Director, Performance Audit Services Group

Friday 12 December 2025

Videoconference

Sport Integrity Australia

- Dr Sarah Benson PSM, Chief Executive Officer
- Mr Luke McCann, Deputy Chief Executive Officer, Strategy, International Policy and Corporate
- Mr Chris Butler, Head of Anti-Doping Operations

Australian National Audit Office

- Dr Caralee McLiesh PSM, Auditor-General
- Ms Rona Mellor PSM, Deputy Auditor-General
- Ms Peta Lane, Group Executive Director
- Ms Christine Chalmers, Executive Director