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SPORT INTEGRITY
AUSTRALIA

National Integrity Framework

Companion Guide:

Participant Protection Policy



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Purpose

This Companion Guide supports sporting organisations and personnel to understand and implement the Participant Protection Policy (Policy) within the National Integrity Framework (NIF). It is to be read and used in conjunction with the Policy.

The Policy is the principal document that sets out mandatory rules and requirements. This Companion Guide provides additional context, explanatory material and practical considerations to assist sports in applying the Policy. The guidance is advisory in nature and does not form part of the Policy.

Introduction

Everyone involved in sport has the right to participate in a safe, positive and enjoyable environment. It is sport's responsibility to put policies and practices in place to help protect everyone and minimise risks of abuse and harm.

The Participant Protection Policy is an update of the previously titled NIF Member Protection Policy. This name change better reflects the intention of the Policy, which is to protect everyone engaging with the sport, not only members¹.

It is important to note that this Policy covers behaviour directed towards adults (people over the age of 18). That includes behaviour by a child or young person towards an adult. However, any conduct directed towards a child or young person (a person under the age of 18) is covered by the NIF Safeguarding Children and Young People Policy.

Fostering safe, inclusive and positive environments

Sporting organisations that recognise, welcome and enable the diverse needs of participants can create safer and more positive environments. Some people, because of factors such as their cultural background, ability, sexual orientation or gender identity, can be more exposed to negative sporting experiences.

By valuing diversity, promoting fairness and removing barriers to participation, organisations can encourage all people to speak up about concerns, strengthening the experience within organisations. More inclusive environments can set clear expectations for acceptable behaviour, reduce exclusion, and make it easier for issues such as discrimination, bullying and abuse to be raised and addressed, lowering the risk of harm occurring in the first place.

There are a range of resources available to guide organisations through creating safe, inclusive and positive environments, including, but not limited to:

- Sport Integrity Australia [resources](#) and [eLearning](#)
- [Play By the Rules](#)
- [The Australian Sports Commission](#)
- [Pride in Sport](#)
- [Welcoming Clubs](#)
- [Good Sports](#)
- [ESafety Commissioner Sports Hub](#)

¹ Refer to page 5 in the Participant Protection Policy to review the definition of 'Relevant Person' and 'Relevant Organisation' and who is bound by the Policy.

Prohibited Conduct

It is important for sporting organisations to clearly communicate to participants what behaviours are appropriate or inappropriate.

Prohibited Conduct² is the term used in the Policy to clearly state what behaviours are inappropriate for a Relevant Person (including a Relevant Person under the age of 18) or a Relevant Organisation. This includes:

- Abuse
- Abusive Behaviour Towards a Person with Disability
- Bullying
- Harassment
- Sexual Misconduct
- Discrimination
- Victimisation
- Vilification.

Sports should note the addition of Prohibited Conduct to specifically address abusive behaviour directed at people with disability on the basis of their disability. This provides a greater focus and attention on the rights of people with disability.

There has also been the inclusion of an additional category of abuse into the Policy, coercive control³.

When is conduct Discrimination under the Policy?

While the Policy prohibits all forms of unacceptable behaviour towards a person on the basis of their age, disability, sex or gender identity, sexuality, race or religion, not all of these behaviours will fall within the definition of Discrimination. For conduct to be Discrimination under the Policy, it needs to have the effect of **impairing or nullifying the enjoyment of a relevant human right**.

When a complaint is alleging discrimination, you should consider the following questions:

- Does the behaviour prevent the person from safely participating in the sport?
- Does the behaviour fall within the definition of direct or indirect discrimination?

If direct:

- Is the unfavourable treatment because of the protected characteristic?
- Is there reason to believe that people who do not have this protected characteristic have been treated more favourably?
- Can the behaviour be more clearly characterised as something else (for example, vilification, harassment, bullying)?

If indirect:

- What is the general Policy/rule/decision? How does it specifically disadvantage a group with one or more protected characteristics?
- Is there any basis on which it may be reasonable in the circumstances to have that rule/policy?

In many cases, verbal or online comments about a particular person or group of people on the basis of their protected characteristic is more likely to be characterised as Harassment or Vilification under the Policy than Discrimination. Among other things, Harassment includes making derogatory comments about a person's race, disability, sexual orientation, gender identity.

² Prohibited Conduct is defined in section 4.1, page 7, within the Policy.

³ See Annexure A, 1. d, on page 9 to read the definition of abuse.

As defined in the Policy, Vilification means a public act, conduct or behaviour, whether in person, online or via any other means of communication, that incites hatred, serious contempt for, or revulsion or severe ridicule of, a person or group of people because of a protected characteristic they hold, as covered by applicable legislation.

Examples of Vilification in the Policy include:

- speaking, writing or otherwise communicating (whether in person, online or via any other means of communication) about a person's sex or gender identity in a way that could make other people dislike, hate, or ridicule them
- publishing claims that a racial or religious group is involved in serious crimes without any evidence in support
- repeated and/or serious verbal or physical abuse (whether in person, online or via any other means of communication) about a protected characteristic of another person
- encouraging violence against people (whether in person, online or via any other means of communication) who belong to a particular sex or gender identity, or damaging their property
- encouraging people to hate a racial or religious group using flyers, stickers, posters, a speech, or publication, or using websites, social media applications or email.

Underpinning themes

When receiving and evaluating a complaint, it is important to look beyond how the matter is framed and consider whether there are underpinning themes that may influence how the complaint should be managed. You should also reference the Companion Guide for the Complaints, Disputes and Discipline Policy.

Complaints may sometimes be written or presented in a way that appears, on face value, to allege Prohibited Conduct under the NIF. However, closer examination may reveal that the core issue is actually a personal grievance, a governance concern, or a selection decision – all of which fall outside the scope of the NIF.

Equally, some complaints that do fall within the NIF may also intersect with these themes. Recognising and separating the elements of the complaint is critical to:

- determining whether the matter is properly within scope of the NIF, and
- ensuring the complaint is managed under the most appropriate policy or process.

The presence of an underpinning theme does not, of itself, invalidate a complaint. However, it may affect how the complaint is categorised, referred or addressed.

Personal grievances

Complaints grounded in personal grievance often arise from unresolved disputes, dissatisfaction with a decision, or an outcome that was not in favour of the complainant. These matters are often highly emotive and may be expressed in strong or accusatory language, making it difficult at first glance to identify the true issue being raised.

A personal grievance may be present where:

- the complaint focuses primarily on perceived unfair treatment rather than specific Prohibited Conduct
- there has been a breakdown in relationship between two or more people
- the issue reflects frustration with decision-making processes or interpersonal conflict.

While the existence of a personal grievance does not automatically mean the information provided is incorrect or biased, the nature of the conduct may not actually meet the threshold for any form of prohibited conduct under the Policy. However, if not properly managed, personal grievances may escalate into genuine Participant Protection issues. It is important to assess whether the conduct alleged

meets the threshold of a NIF complaint. Complaints should not be considered in scope of the NIF solely because safeguarding or integrity language has been used if the underlying issue is a grievance that does not involve Prohibited Conduct.

Where the alleged conduct does not fall within the scope of the relevant policy, the complainant should be informed of this and, where appropriate, directed to alternative pathways or processes.

Governance matters

While poor governance can contribute to integrity issues, not all governance concerns are NIF matters. As sporting organisations are self-regulated and operate under their own constitutions, policies and procedures, governance issues need to be managed by sporting organisations with support from relevant stakeholders as required.

Governance issues may arise where:

- policies are outdated, unclear or poorly implemented
- decision-making processes lack transparency or accountability
- officials, committee members or other members fail to comply with governance obligations.

If the substance of a complaint relates primarily to governance failures such as dissatisfaction with rules, policy gaps, committee conduct or organisational decision-making, it may be more appropriately addressed through:

- the sport's Constitution
- a code of conduct process
- internal review or committee consideration
- support from external bodies (for example, the NSO, SSO, local league or association, SIA, ASC or local government).

While poor governance can have an indirect impact on participation, wellbeing or safety, this does not automatically mean the matter falls under the NIF. A complaint should not be managed under the Participant Protection Policy unless the alleged conduct genuinely constitutes Prohibited Conduct under the Policy, and meets the NIF threshold.

In these cases, the sport may:

- acknowledge receipt of the concern
- explain why the matter is out of scope of the NIF, and propose an alternative resolution process
- outline how and where the issue will be considered or addressed (for example, at a future committee meeting or through policy review).

Selection matters

Selection decisions are a common source of complaints and may be presented as allegations of exclusion, unfairness or discrimination. These matters require careful consideration to identify whether they relate to:

- a legitimate selection decision made in accordance with selection criteria and processes, or
- conduct that may amount to discrimination or another form of Prohibited Conduct under the NIF.

Many selection decisions in sport are inherently subjective and may not always be accompanied by detailed explanations. This can lead to perceptions of unfair treatment, particularly where the outcome has a significant personal impact on the individual.

A selection complaint may fall outside the NIF where:

- the concern relates to performance-based or discretionary decisions made according to selection policies
- there is no evidence that the decision was based on a protected characteristic
- the issue is procedural rather than conduct-based.

However, if a complainant alleges that a protected characteristic (such as age, sex, gender, disability, race or ethnicity) was the basis for the selection decision, and that this impacted their right to participate in sport, the matter may meet the threshold for discrimination under the Participant Protection Policy. Similarly, if the complainant alleges that they were excluded because of complaints they have made about the sport, or because of a personal campaign against them, this may warrant consideration of Victimisation or Bullying under the Policy.

Clear documentation of selection criteria, processes and decision-making is essential. Transparency in how decisions are made assists in determining whether allegations of discrimination or exclusion are valid and whether a complaint is appropriately managed under the NIF.

Managing matters with mixed themes

Where a complaint contains elements of personal grievance, governance or selection alongside allegations of Prohibited Conduct, sports should:

- break down the complaint into its component parts
- identify which elements (if any) fall within the scope of the NIF
- manage out-of-scope elements under the appropriate alternative policy or process.

This may include:

- referring the matter internally (for example, escalating a club-level issue to the SSO or NSO or de-escalating an issue to the SSO or club)
- managing the issue informally, such as acknowledging the concern and explaining what action can reasonably be taken
- advising the complainant of limitations (for example, funding constraints or policy boundaries) while confirming the issue has been noted for future consideration.

Clear communication about jurisdiction, scope and available options helps prevent misuse of the NIF process, supports fair decision-making, and maintains trust in the National Integrity Framework.