



SPORT INTEGRITY
AUSTRALIA

STATEMENT OF COMPLIANCE

WITH THE COMMONWEALTH
CHILD SAFE FRAMEWORK

October 2023



About Sport Integrity Australia

Our role is to keep Australian sport safe and fair, at all levels, for all participants. The Australian Government established our agency in 2020 to draw together the country's existing sport integrity capabilities, knowledge and expertise, and to coordinate and develop new threat responses, including prevention, detection, investigation and enforcement programs.

We work with sports to support their existing integrity functions or develop new capabilities, so they can protect their athletes and the competitions they govern. We provide resources, capability and education to help sports, as well as offering an independent complaint handling model to address integrity issues that arise in sport.

We acknowledge that we cannot protect sport on our own, so our response is a partnership model which brings together law enforcement, border protection agencies, regulatory agencies, wagering service providers, child protection agencies, human rights/anti-discrimination agencies, academic institutions and the health sector. In addition, we work closely with sports to help build their integrity capabilities and responses, from those with no designated sport integrity resources, to those with established integrity units. We strive to ensure our work is informed by the athletes and participants of sports that we are trying to protect and we have mechanisms in place to receive ongoing feedback from our key stakeholders.



Commitment to Child Safety

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

Interaction with children

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

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

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

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

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



Child Safe Risk Assessment

We remain committed to an organisational culture that ensures the safety, welfare and wellbeing of children. A fundamental step in fulfilling this commitment and other risk-based undertakings is to ensure our risk management framework is fit-for-purpose.

In our 2022 Child Safe Compliance Statement, we made a commitment to use our re-developed key risk artefacts, specifically our appetite and tolerance statements and consequences, to support our Child Safe Risk Assessment.

We delivered on our commitment and consulted extensively throughout 2023 to develop a contemporary and fit-for-purpose risk assessment. This consultation, across all teams in our agency, focused on collaboration and information sharing to inform the development of a comprehensive risk analysis tool. This tool leverages our risk appetite and risk tolerance statements and was the foundation for our Child Safe Risk Assessment. This work allowed us to:

- identify all business practices and potential hazards that would result in contact with children
- recognise what could go wrong when interacting with children and record potential risk events
- identify our inherent risk profile including likelihood, consequence and risk ratings of relevant risks
- review and record all existing controls for managing child safety risks relevant to our agency
- determine our residual risk profile once controls are in place for each risk
- articulate our risk escalation pathway and identify owners of all risks to ensure responsibility and accountability.

Through our risk assessment we identified a residual risk rating of high. We also ascertained that certain risk events associated with our standard business

operations have the potential to cause significant danger or harm to children.

These risks events have the potential to occur during:

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

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

Work is already progressing to review our current list of controls outlined in the risk assessment. We have already consulted internally to ensure controls are specific, relevant and measurable for effectiveness. We will continue to refine our child safe risk assessment and ensure all reviews are outlined in a future 'Child Safety Action Plan'.



Compliance with the Framework

Implementation of the Framework remains a priority for the agency, and we are compliant with each of its 4 requirements. During the past 12 months we undertook several activities, detailed below, to assist us.

1

Requirement 1

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

- Child safety is considered and analysed within our 2023 Child Safe Risk Assessment.
- Through extensive consultation with business areas, the integration of our risk appetite and tolerance statements, and guidance from the National Office for Child Safety, we were able to develop and finalise a fit-for-purpose risk assessment.
- As an agency that is responsible for the safety and wellbeing of children, we are committed to continually re-evaluating our interactions with children, consulting with our safeguarding experts and reviewing existing controls to ensure they are contemporary and relevant.

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Requirement 2

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

- We maintained clear and well-communicated policies that meet the requirements of the Framework, and managed additional child-related risks specific to the agency.
- We provided training to staff about their obligations under the Framework and internal child safety policies:
 - during 2023 we delivered an online training session for our staff focusing on our Child Safe Policy, to ensure staff recognise and understand the important role we all play as an Australian child safe organisation
 - as part of their annual performance review and to achieve a fully effective rating, staff completed the Commonwealth Child Safe Framework eLearning course.
- We applied robust staff screening processes to check the suitability of all staff who will work with children, including a requirement for them to obtain a relevant Working with Children Check / Working with Vulnerable People Check.

3

Requirement 3

Adopt and implement the National Principles for Child Safe Organisations.

- We continued to adopt all of the National Principles.
- We reviewed and re-published our Child Safe Policy in August 2023 in line with National Principles for Child Safe Organisations. Edits to the policy included the acknowledgement of 'routine' or 'unplanned' interactions with children and a requirement for staff to record and inform their line manager when they have been in a one-to-one situation with children.
- We have mandated the 2023–2024 Australian Public Service Commonwealth Child Safe Framework eLearning course for all our new starters, noting this course complements the National Integrity Framework Safeguarding Children and Young People Policy.

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Requirement 4

Publish an annual statement of compliance with the Framework including an overview of the entity's child safety risk assessment (conducted under Requirement 1).

- We publish our Statement of Compliance in October each year.

Child safety initiatives

In addition to focusing on our own child safe activities, we were committed to keeping Australian sport environments safe, supportive and friendly for children and young people. Child safety must be embedded in every Australian sporting organisation's culture and understood and practised at all levels of the sport. To achieve this end over the last 12 months, we supported our sport partners by:

- launching the Safeguarding in Sport Continuous Improvement Program, which supports sporting organisations to safeguard, protect and prevent harm to all children and members that participate in sport. The program, which is underpinned by the National Principles for Child Safe Organisations and best practice, promotes a nationally consistent approach to child safeguarding and member protection
- reviewing the Safeguarding Children and Young People Policy as part of the National Integrity Framework, which is a set of policies that all members of a sport need to follow when it comes to their behaviour and conduct in sport
- continuing to work in partnership with the Play by the Rules initiative and website, which provides information, resources, tools, campaigns and free online training to increase the capacity and capability of administrators, coaches, officials, players, parents and spectators to assist them in preventing and dealing with discrimination, harassment, child safety, inclusion and integrity issues in sport
- releasing a new tranche of print and digital resources designed to help organisations protect children and young people in sport.

Further considerations

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

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

Child safety and protection remains a core priority for our agency now and into the future.

