



Final Athlete Safeguarding Governance and Culture Review of the Western Australian Institute of Sport

Final Report

July 2024

(Review fieldwork
completed 28 March 2024)



Acknowledgement of Country

At KPMG, we recognise Aboriginal and Torres Strait Islander peoples as First Peoples of this nation.

We pay our respects to Elders past, present, and future as the Traditional Custodians of the land, water and skies of where we work.

At KPMG, our future is one where all Australians are united by a shared, honest, and complete understanding of our past, present, and future. We are committed to making this future a reality. Our story celebrates and acknowledges that the cultures, histories, rights, and voices of Aboriginal and Torres Strait Islander People are heard, understood, respected, and celebrated.

Australia's First Peoples continue to hold distinctive cultural, spiritual, physical and economical relationships with their land, water and skies. We take our obligations to the land and environments in which we operate seriously.

Guided by our purpose to 'Inspire Confidence. Empower Change', we are committed to placing truth-telling, self-determination and cultural safety at the centre of our approach. Driven by our commitment to achieving this, KPMG has implemented mandatory cultural awareness training for all staff as well as our Indigenous Peoples Policy. This sincere and sustained commitment has led to our 2021-2025 Reconciliation Action Plan being acknowledged by Reconciliation Australia as 'Elevate' – our third RAP to receive this highest level of recognition. We continually push ourselves to be more courageous in our actions particularly in advocating for the Uluru Statement from the Heart.

We look forward to making our contribution towards a new future for Aboriginal and Torres Strait Islander peoples so that they can chart a strong future for themselves, their families and communities. We believe we can achieve much more together than we can apart.



Acknowledgements

We extend our deepest gratitude to all the participants who generously contributed their time, insights, and lived experience to this Review.

We would like to express our sincere appreciation to each individual who participated in interviews, surveys, and focus group discussions. We acknowledge the collective contributions of those with lived experience. We thank the members of the community who have spoken out and shared their stories. We recognise those with lived experience who continue to recover from the long-term impacts of trauma.

We acknowledge the support and collaboration of the Western Australian Institute of Sport in facilitating the data collection process.

We acknowledge and thank everyone who took part in this Review.

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This report has been prepared as outlined with the Department of Local Government, Sport and Cultural Industries in the Scope Section of the engagement contract dated September 12, 2023. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

The findings in this report are based on the Athlete Safeguarding Governance and Culture Review of the Western Australia Institute of Sport (WAIS), where stakeholders were engaged by a range of means including cultural perception surveys, in-person and virtual consultation sessions, and focus groups. Eligible participants were current or former (within the past five years):

- WAIS athletes, including children and young people
- family members of an athlete including parents and guardians of athletes
- WAIS coaching staff, support staff or member of the WAIS Board, executive, management, administration staff or medical staff.

The reported results reflect a perception of WAIS but only to the extent of the sample surveyed, being a representative sample of the abovementioned eligible participants within the review period. Any projection to the wider WAIS stakeholders is subject to the level of bias in the method of sample selection of eligible participants within the past five years (Review Period).

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, the Department of Local Government, Sport and Cultural Industries and Western Australian Institute of Sport stakeholders consulted as part of the process.

KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report in either oral or written form, for events occurring after the report has been issued in final form.

Notice to Third Parties

This report is solely for the purpose set out in the Scope Section and for Department of Local Government, Sport and Cultural Industries' information, and is not to be used for any purpose not contemplated in the contract or to be distributed to any third party without KPMG's prior written consent.

This report has been prepared at the request of Department of Local Government, Sport and Cultural Industries in the Scope Section of the engagement contract dated September 12, 2023. Other than our responsibility to Department of Local Government, Sport and Cultural Industries, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that party's sole responsibility.

Section 1:

Executive Summary

1.1 Context

The Western Australian Institute of Sport (WAIS or 'the Institute') is an elite sporting institution that aims to:

- focus on preparing athletes for the world stage
- act in the best interests of athlete health, wellbeing, and safety
- partner to enhance the high performance sport system for Western Australia.

WAIS, part of the National Institute Network (NIN), collaborates with National Sporting Organisations (NSOs), the Australian Institute of Sport (AIS), State Sporting Organisations (SSOs) and other sporting bodies to advance athletic success. WAIS Athletes represent their Club; State and Country during their training and competition performances.

As an elite sporting institute, WAIS operates within Australia's high performance sport ecosystem, the network of organisations convened to support the ambitions and delivery of Australia's Olympic, Paralympic and Commonwealth Games sports and athletes.

To be formally recognised as a WAIS athlete, individuals must either qualify to become a scholarship holder or a person that can access WAIS' facilities and training environment under a training agreement. WAIS interacts with athletes through their participation and involvement in WAIS' sporting programs. Programs fall within three categories of Performance Enhancement Teams (PET): Podium, National, and Pathway Performance. Each respective PET has various stakeholder involvement and associated performance outcomes.

It is acknowledged that, in elite and high performance sport, athletes face increased physical and mental pressures in the pursuit of their sporting endeavours. The elite sport landscape has been described as an environment where power imbalances exist, where governance structures are difficult to navigate and where support systems may lack independence.

In 2021 Sport Integrity Australia conducted the Independent Review into WAIS Women's Artistic Gymnastics and in 2022 released their findings. Through their investigations, Sport Integrity Australia concluded that it was reasonably likely that some of the gymnasts in the program had been subjected to harm or abuse while at WAIS. In response to findings of the Sport Integrity Australia Report, the Hon. David Templeman, Minister for Sport and Recreation, tasked the Department of Local Government, Sport and Cultural Industries (the Department) to conduct this review of athlete safeguarding governance and culture review at WAIS (the Review).

Following review and consideration of the Independent Review into WAIS Women's Artistic Gymnastics Report, WAIS made a public apology to any participants who experienced abuse or harm as a result of their involvement in the WAIS Women's Artistic Gymnastics program and accepted the Report's recommendations.¹

In 2023, various new appointments to the WAIS Senior Leadership Team and WAIS Board were made, including the deployment of an acting-CEO to lead the organisation at the time of the Review. Between September 2023 and December 2024, 9 new members were appointed to the WAIS Board including a new Board Chair. All previous Board members, excluding the DLGSC ex-officio member, retired in August and September 2023. In October 2023, the previous CEO departed WAIS and an acting-CEO was appointed.

WAIS has a number of integrity-related policies and procedures including the Safe and Ethical Practice Policy Framework (SEPPF) introduced in 2019. The SEPPF includes policies such as the Staff and Athlete Code of Conduct, Safeguarding Children and Young People Policy (established 2021) and Athlete Protection Policy (established 2020). As of 1 January 2024, WAIS formally adopted the Sport Integrity Australia National Integrity Framework (NIF) and continued implementing integrity-related policies and processes to bolster safeguarding governance at the Institute. The NIF Safeguarding Children and Young People Policy and NIF Participation Protection Policy is now considered part of the SEPPF and has superseded previous policies. At this time, WAIS additionally deployed a dedicated Integrity and Safeguarding Manager, commencing on 15 January 2024, accountable for supporting the implementation of the NIF and to manage athlete concerns and complaints.

Within the scope of this Review, it is important to acknowledge the unique period between 2020 and 2021, marked by the global COVID-19 pandemic that undeniably affected the high performance sport ecosystem. WAIS, like other organisations, faced unprecedented challenges due to COVID-related protocols that significantly impacted its operational capabilities and the capacity to implement change.

¹ WAIS, [WAIS Response To The Sport Integrity Australia WAIS Women's Artistic Gymnastics Program Report Recommendations](#), May 2022

For the purpose of this Review, safeguarding is defined as the actions taken to protect athletes, including children and young people, from harm, abuse and threats to their physical, psychological, and emotional wellbeing. The term encompasses both a preventative and reactive response.

1.2 Review objective and approach

Objective

The objective of this Review was to inform WAIS, the Department and the Minister for Sport and Recreation on areas relating to athlete safeguarding governance and culture at WAIS, both historically (from April 2019) and currently.

Scope

Based on the objective outlined above, the Review aim was to:

- Understand governance and culture in relation to the safeguarding of athletes including children, young people, and adults between 1 April 2019 to 28 March 2024.
- Consider safeguarding policies and procedures at WAIS including any changes or improvements made within the review period, including but not limited to, WAIS' adoption of the Safeguarding Children and Young Policy, Member Protection Policy and Complaints, Disputes and Discipline Policy of Sport Integrity Australia's National Integrity Framework.
- Identify any gaps, concerns and strengths relating to current safeguarding culture and governance at WAIS.
- Make recommendations through a report to ensure:
 - WAIS is providing a safe environment for athletes
 - WAIS' practices, processes, policies and systems align with better practice safeguarding governance and culture, in the high performance sport environment.

The scope of the Review considered historical practices from 1 April 2019 to 28 March 2024 (the review period). The Review was undertaken between 12 September 2023 and July 2024. Fieldwork for the Review concluded on 28 March 2024, for this reason the conclusions drawn in this report are reflective of policies, practices and perceptions as of 28 March 2024.

The following stakeholder groups were in scope of the Review:

- current and former WAIS athletes, including children and young people, who were involved in WAIS sporting programs during the review period
- families of current and former WAIS athletes, including parents and guardians of athletes, who were involved in WAIS sporting programs during the review period
- current and former WAIS coaches and support staff, such as medical staff, strength and condition staff and sports psychologists, who were involved in WAIS sporting programs during the review period
- current and former WAIS administrative staff, senior leadership team and WAIS Board members, who were involved with WAIS during the review period.

The scope of the Review did not include:

- A review of safeguarding culture and governance including programs, policies, and practices at WAIS outside the review period, including the WAIS Women's Artistic Gymnastics (WAG) Program
- A review of programs or activities not run or managed by WAIS.
- A review of the implementation of Sport Integrity Australia Report recommendations.
- A review of the design of the National Integrity Framework, or consideration of areas outside of safeguarding or member protection, including but not limited to, improper use of drugs and medicine, competition manipulation and sport gambling.
- The investigation and/or resolution of individual complaints.

- The consideration of WAIS’ organisational governance arrangements outside of governance, oversight and monitoring of safeguarding, such as:
 - establishment (for instance, its status as a body incorporated under the Associations Incorporation Act 2015)
 - effectiveness as a high performance sporting organisation, focusing on preparing athletes for the world stage
 - financial management.
- Consideration of WAIS’ organisational culture outside of safeguarding culture.
- Consideration of policies or procedures which do not relate to athlete safeguarding such as National Integrity Framework’s Improper Use of Drugs and Medicine Policy or Competition Manipulation and Sport Gambling Policy.
- Occupational health and safety of WAIS staff unrelated to athlete safeguarding, including bullying and harassment processes.

The scope of this Review specifically excluded the handling of individual complaints or the investigation of safeguarding incidents or matters. All participants were provided with information to raise concerns, incidents or complaints to WAIS or alternative independent avenues such as the AIS Be Heard Program or through the Department of Local Government, Sport and Cultural Industries (DLGSC). All processes to respond to disclosures, concerns or complaints were conducted in line with the Review Methodology agreed by DLGSC.

For the detailed Terms of Reference, see Appendix A.

Project approach

In order to deliver against the scope of the Review, the following approach was applied.

1 Development of the Review Methodology and Framework

To support the undertaking of the Review, a Review Methodology was developed which detailed the approach and methodology. The Review Methodology documented principles for the Review ensuring a safe, person-centred and trauma-informed approach was embedded and aimed to consistently guide the Review.

Within the Review Methodology was a Review Framework which provided a structure to consider WAIS’ safeguarding culture and governance, aligned to the Review’s objective, and was informed by better practice principles.

The Review Framework was categorised by building blocks, enablers, and outcomes. Refer to Section 3 for detailed information regarding the Review Framework.



Figure 1: Review Framework Summary

2 Consultations

Open and voluntary consultations were undertaken with current and former athletes, families, staff, management and leadership to understand perspectives on historical and current athlete safeguarding and governance practices. The Review sought to embed a safe, person-centred and trauma-informed approach to consultations, utilising a mixed-methods approach. The following mix-methods were used:

- Surveys were made available for persons within the scope of the Review to provide their perspectives and feedback on WAIS' governance and culture as it relates to athlete safeguarding. A series of questions aligned to the Review Framework were developed to collect insights into current and historical practice. See Section 7 for detailed survey outcomes.
- Focus groups were conducted with current WAIS athletes, coaches and support staff, the Senior Leadership Team and WAIS Board, via online and in-person workshops to understand the culture of athlete safeguarding. KPMG deployed a targeted stakeholder engagement approach, including scheduling focus groups around athlete training sessions, to increase the participation of current WAIS athletes, coaches and staff.
- Individual interviews with current and former WAIS athletes, current and former families of athletes, current and former coaches and support staff, administrative staff, current and former members of the Senior Leadership Team and current and former WAIS Board were performed, online and in-person, to understand the current and historical perceptions of athlete safeguarding. See Section 6 for detailed interview and focus group outcomes.

Refer to Section 4 for an overview of consultation participation.

3 Site visits

Three site visits were undertaken as part of the Review to obtain an on-the-ground assessment of culture, behaviours and risks. The three sites were selected by KPMG from a refined list developed by WAIS management which included sites where there was WAIS staff availability, training occurring and accessibility to facilities. The three sites included the WAIS High Performance Service Centre (HPSC), University of Western Australia (UWA) Hockey Club and WA Athletics Stadium.

4 Desktop review

A desktop review of historical and current policies, procedures, strategic documents, guidance documents and system screenshots relevant to safeguarding culture, governance and complaints during the review period at WAIS was conducted. The desktop review aimed to garner an understanding of the organisational policies and procedures that govern and guide athletes, families of athletes and staff on all areas of athlete safeguarding.

5 Complaint analysis

In line with the Review Terms of Reference and Review Methodology, detailed analysis of complaint handling processes via sample testing of a selection of past athlete safeguarding complaints was to be performed. Sample testing could not be performed due to limitations in record keeping, lack of evidence and unavailability of key staff, see Section 1.3 for more information.

For this reason, analysis of the complaint handling processes was informed by written and verbal accounts from WAIS staff. WAIS supplied a document outlining the historical process for handling complaints, and an interview was conducted to understand current complaint handling processes.

6 Analysis and reporting

Information from data gathering activities including consultation, site visits, desktop review and complaints analysis, was then analysed to inform this Report.

For each element of the Review Framework, this report includes context, findings, a summary of data collected, the impact and recommendation for improvement.

1.3 Review limitations

The following limitations need to be considered when interpreting the findings and outcomes of this Review.

- Whilst efforts to raise awareness of the Review were made by KPMG, there are people who may not have come forward to participate in the review due to being unaware or choosing not to participate.
- The Review adopted a voluntary approach to participation to ensure safe, trauma-informed consultation, however, KPMG acknowledge that not all staff and athletes participated in the Review as a result.
- The desktop review revealed that the completeness of information and data was inconsistent. Some requested documents had been largely redacted such as WAIS Board and Audit and Risk Committee meeting agendas and minutes, and some requested documentation was not provided. KPMG requested the following documents for review; however, WAIS were unable to present this information or did not have this information available at the time of the Review:
 - Whilst a summary document with limited information pertaining to a sample of complaints was provided, deidentified complaint data, including information regarding the outcomes and response to complaints, the actions taken by staff to address the complaint and how complaints were reviewed was not provided. For more information regarding complaint data limitations refer to Finding 5.3.3, complaint analysis.
 - Unredacted WAIS Board and Audit and Risk Committee agenda and minutes.
 - Results from the AIS Daily Performance Environment (DPE) Insights Survey.
 - Information regarding WAIS' workforce planning or resource allocation processes.
- KPMG attempted to conduct complaint sample testing, however, WAIS were unable to provide evidence pertaining to complaints management processes, including evidence of how complaints were assessed and managed, and information supporting the management of individual complaint matters.
- Selection of specific sites visited during the Review was determined by KPMG based on a refined list developed by WAIS management which include sites where there was WAIS staff availability, training occurring and accessibility to facilities. A risk-based approach to selection, as per the Review Methodology, was therefore not taken.

1.4 Key findings and recommendations

Over the past five years, based on the feedback received, WAIS' safeguarding practices have undergone important evolution, in line with the expectations of the community. During the Review Period, WAIS made efforts to strengthen its safeguarding practices. This included the introduction of the SEPPF in 2019, the Athlete Protection Policy in 2020, Safeguarding Children and Young People Policy in 2021 and training and education for WAIS staff such as the AIS Respectful Behaviours pilot in 2021. More recently, this included the integration of an Integrity and Safeguarding Manager, adoption of Sport Integrity Australia's NIF and leadership changes to management and the WAIS Board. It was noted that current members of management and the WAIS Board are committed to athlete safeguarding continuous improvement. Numerous athletes reported having positive experiences, greatly valuing the time spent at WAIS and the support received from WAIS. However, despite these advancements, the Review which concluded its fieldwork in March 2024, has identified significant gaps in the governance of safeguarding practices that has directly affected the culture of safeguarding at WAIS. This encompasses challenges such as deficiencies in the handling of complaints, inadequate oversight, and the management of safeguarding risks and a lack of engagement with athletes and their families.

Over the course of the Review Period, a culture emphasising the prioritisation of winning, medals, and performance has been fostered, overshadowing the critical importance of athlete safeguarding. Some athletes expressed concerns for their safety, sharing times where they did not feel safe at WAIS and reported instances of harm and abuse. Addressing issues documented within this Report is essential to recalibrate the organisation's values and ensure the wellbeing and safety of all athletes is held paramount.

Aligned to the Review Framework, the outcomes of this Review are summarised into four key themes, summarised below.

Theme 1: Safeguarding culture and commitment

Finding 5.1.1 Most athletes value their time at WAIS.

Recommendations

To ensure athletes continue to value their time at WAIS, the recommendations of this Review should be implemented.

Finding 5.1.2 Athlete safeguarding should be promoted as an integral part of the strategic agenda.

Recommendations

5.1.2.1 Set WAIS' athlete safeguarding strategic objectives and priorities.

5.1.2.2 Develop an athlete safeguarding framework.

5.1.2.3 Communicate and clarify WAIS' commitment to athlete safeguarding.

5.1.2.4 Develop a targeted approach to workforce planning to ensure athletes can be supported.

Finding 5.1.3 Leaders should role model and inspire behaviours which prioritise athlete safeguarding.

Recommendations

5.1.3.1 Enhance athlete safeguarding role modelling.

Theme 2: Governance

Finding 5.2.1 Establish governance arrangements to strengthen accountability, oversight and implementation of athlete safeguarding.

Recommendations

5.2.1.1 Establish a governance model and structures that will support the effective oversight of athlete safeguarding.

5.2.1.2 Enhance monitoring and reporting to governance structures.

5.2.1.3 Formalise processes and mechanisms to identify, monitor and adhere to legislative and regulatory obligations.

5.2.1.4 Embed third party contract management.

5.2.1.5 Develop a process to identify, declare, manage and monitor conflict of interest.

5.2.1.6 Enhance data governance.

Finding 5.2.2 Roles, responsibilities and accountabilities for athlete safeguarding should be defined and documented.

Recommendations

5.2.2.1 Define roles, responsibilities and accountabilities for athlete safeguarding.

Finding 5.2.3 Strengthen and embed athlete safeguarding policies and procedures.

Recommendations

5.2.3.1 Conduct a reconciliation of the current suite of policies and procedures.

5.2.3.2 Enhance safeguarding policies and procedures.

5.2.3.3 Enhance policy and procedure version control.

Theme 3: Preventing and responding to complaints, concerns and incidents

Finding 5.3.1 Enhance risk management strategies to prevent, identify and mitigate safeguarding risks to athletes.

Recommendations

5.3.1.1 Embed organisational risk management and identify, manage and mitigate athlete safeguarding risks.

Finding 5.3.2 Barriers to raising concerns and complaints should be addressed.

Recommendations

5.3.2.1 Improve reporting culture at WAIS.

Finding 5.3.3 Complaint handling policies and processes must be documented, embedded, well understood and accessible to all.

Recommendations

5.3.3.1 Strengthen complaint management policy, process, and procedure.

5.3.3.2 Establish a child-friendly and age-appropriate complaint process.

Finding 5.3.4 Apply consistent approaches to holding athletes and staff accountable for unsafe behaviours or conduct inconsistent with WAIS policy and expectations.

Recommendations

- 5.3.4.1 Embed athlete safeguarding into recruitment.
- 5.3.4.2 Develop a system to consistently hold people accountable.
- 5.3.4.3 Embed athlete safeguarding, wellbeing and experience indicators into performance metrics.

Finding 5.3.5 Athlete safeguarding incident management processes should be established.

Recommendations

- 5.3.5.1 Develop an incident management process.

Theme 4: Engagement and awareness

Finding 5.4.1 Improve athlete safeguarding engagement and awareness for athletes and their families.

Recommendations

- 5.4.1.1 Improve athlete safeguarding education for athletes and their families.
- 5.4.1.2 Promote athlete rights within WAIS.
- 5.4.1.3 Enhance athlete and family engagement.

Finding 5.4.2 Mechanisms to promote diversity and inclusion should be developed.

Recommendations

- 5.4.2.1 Consider the diverse needs of WAIS athletes and the WAIS community.
- 5.4.2.2 Consider the development of a diversity and inclusion plan and commitment at WAIS.

Finding 5.4.3 Enhance education for WAIS staff, volunteers, and contractors to uplift awareness and understanding of athlete safeguarding.

Recommendations

- 5.4.3.1 Enhance athlete safeguarding education for staff and contractors.

Section 2:

Background

2.1 The Australian high performance sport environment

Elite and high performance sport is a core marker of Australian's identity and culture. As a nation, Australia prides itself upon its achievements in the sporting landscape, whether that be at a community level or on the international stage. High performance sport inherently encompasses increased mental and physical pressure, power imbalances between athletes, coaches and institutions, exclusivity which results in a lack of inclusiveness, as well as the public profile and scrutiny that comes with elite sport. High performance sport generally exists within the context of complex governance structures involving many organisations across the sporting ecosystem.

High performance sport can be incredibly rewarding for those who achieve success on the world stage. Athletes often face pressure to perform, intense competition, and dedicate their lives to winning medals and breaking records. Pressures and influences can stem from coaches, sporting institutions, sponsors, competitors and peers, and all have a collective and direct impact on the culture of sport. Experiences as an elite athlete have a lifelong impact, for many athletes, impacting their identity, mindset and values. For some, these experiences have incited trauma, and only after time away from sport is that trauma realised.

The unique factors of a high performance sporting culture can make it difficult for people to speak out about inappropriate behaviours, practices or abuse for fear of retribution or because it may be the accepted norm. These risk factors can promote and encourage behaviours and decisions which deprioritise or exploit the safety and wellbeing of athletes if not proactively managed. Further, these risk factors, and their impacts, are exacerbated for those who are inherently more vulnerable such as children, people living with disability or those from diverse backgrounds. Children often have less life experience, lower risk perception and a dependency, trust and reliance on adults, increasing the risks of a high performance sporting environment.

The high performance sporting environment sits within a broader sports ecosystem, and WAIS operates within a complex governance environment, with various regulatory bodies, peak bodies and national sporting organisations playing roles in the delivery and management of high performance sporting programs. An athlete's end-to-end experience is impacted by decision makers across the sports ecosystem. This complexity increases the need for clarity, transparency and strong accountability to be embedded in the governance model of a sporting institution to ensure the safety and wellbeing of all involved in sport.

State and Territory governments have established institutes and academies of sport to assist their high performance athletes. The National Institute Network (NIN) comprises the AIS and the eight State and Territory Institutes and Academies of Sport, including WAIS.

Australian governments at all levels play a leading role in delivering sport and sport related policies and programs. This includes providing support and funding to sporting organisations, clubs, and individuals; being major investors and contributors to building and maintaining sports related infrastructure; and sponsoring the hosting of major sports events. DLGSC is the primary funder of WAIS, in addition to funding received from National Sporting Organisations (NSOs).

2.2 Evolution of athlete safeguarding

The sporting sector in Australia has faced scrutiny through several recent inquiries that have threatened the integrity of sport, namely the *Australian Human Rights Commission Review into Gymnastics*², the *Wood Review*³ and the learnings from relevant case studies of the *Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission)*⁴. Together these reviews and inquiries have uncovered the pressure to win at all costs, the power imbalances which exist between coaches and athletes, the exclusivity which results in a lack of inclusiveness, as well as the often-public profile and scrutiny that comes with elite sport.

On 5 August 2017, the Hon. Greg Hunt announced a review of the integrity of Australia's sporting industry to support the development of a National Sport Plan. The *Wood Review* examined the landscape of Australia's sporting sector, including potential threats to the integrity of Australia's sporting endeavours. The Review presented

² Australian Human Rights Commission, *Change the Routine: Report on the Independent Review into Gymnastics in Australia*, May 2021

³ Commonwealth of Australia as represented by the Department of Health, *Report of the Review of Australia's Sports Integrity Arrangements*, 2018

⁴ Royal Commission into Institutional Responses to Child Sexual Abuse, *Royal Commission into Institutional Responses to Child Sexual Abuse Final Report*, 2017

its findings in 2018, with 52 recommendations made to enhance the systems in place that support athletes on both the domestic and international sporting stage.

In response to these recommendations, the Australian Government established a national sports integrity body, namely, Sport Integrity Australia. Sport Integrity Australia's role is to provide advice on the use of prohibited substances in sport, abuse of children and other persons, manipulation of sporting competition and failure to protect members of sporting organisations from bullying, intimidation and harassment.

Sport Integrity Australia identified the need for a national approach to integrity issues within sport. In 2021, the National Integrity Framework (NIF) was developed and introduced to some sports. The NIF is a consistent set of policies that, when adopted, all members of the sport must follow when it comes to their behaviour and conduct in sport. NSOs and NIN organisations can sign up and adopt the NIF if they choose to.

In 2021 Sport Integrity Australia conducted the *Independent Review into WAIS Women's Artistic Gymnastics Program* and in 2022 released their findings. Through their investigations, Sport Integrity Australia concluded that it was reasonably likely that some of the gymnasts in the program had been subjected to harm or abuse while at WAIS. The Australian Human Rights Commission also conducted an independent review of culture and practice at all levels of the sport of gymnastics in Australia. Collectively, these reviews identified systemic failings in safeguarding, education, and complaints procedures, compounded by insufficient oversight.

Such systemic issues instil a fear of speaking out⁵, perpetuate detrimental behaviours to wellbeing and safety, and allow exploitation of power imbalances⁶.

In 2022 Australia's High Performance 2032+ Sport Strategy, commonly known as HP2032+, was introduced. The vision of the strategy is to win well to inspire Australians. The strategy has been co-designed by Australia's high performance sport system, with the aim to foster collaboration, alignment, clarity and accountability across the system. The strategy includes the Win Well Pledge, acknowledging the importance of success and rewarding high performance, highlighting wellbeing as the foundation of sustainable success.

In December 2022, WAIS endorsed the HP2032+ strategy and made a commitment to Win Well. WAIS has made a commitment to balancing success and wellbeing in high performance sport.⁷ Additionally, in May 2023, the WAIS Board made a Board Commitment Statement whereby 'above all, WAIS will act in the best interests of athlete health, wellbeing and safety.'

Child safeguarding landscape

A key outcome of the Royal Commission was the development of the *National Principles for Child Safe Organisations (2018) (National Principles)*. These principles provide a framework to guide organisations in developing child safe cultures and practices, including the ability to identify risks and take agreed actions to prevent, respond to and report child abuse. The WA Government is committed to supporting the development of safe organisations for children and young people and is working to develop an independent oversight system that includes monitoring and enforcement of the National Principles. In the meantime, the WA Government encourages organisations across the state that engage with children and young people to implement the National Principles.⁸ Child safeguarding requirements and legislation is constantly evolving. For example, doctors and nurses are currently mandatory reporters and from 1 May 2024 psychologists will be mandatory reporters under the *Children and Community Services Amendment Act 2021*.

2.3 WAIS' approach to athlete safeguarding

WAIS is an elite sporting institution that aims to:

- focus on preparing athletes for the world stage
- act in the best interests of athlete health, wellbeing, and safety
- partner to enhance the high performance sport system for Western Australia.

It hosts 12 sporting programs within its remit and provides training, coaching and holistic supports to ensure athletes can achieve their sporting goals.

⁵ Sport Integrity Australia, *Western Australian Institute of Sport Women's Artistic Gymnastics Program Review*, April 2022

⁶ Australian Human Rights Commission, *Change the Routine: Report on the Independent Review into Gymnastics in Australia*, May 2021

⁷ WAIS, *The Western Australian Institute of Sport is part of a united commitment: 'We Win Well To Inspire Australians.'* December 2022.

⁸ Western Australian Government Department of Communities, *Child safe organisations*, March 2024.

The current WAIS sporting programs include:

- Athletics
- Women's Basketball
- Canoeing
- Cycling
- Diving
- Hockey
- Netball
- Rowing
- Sailing
- Swimming
- Wheelchair Basketball
- Individual Athlete Program

Additionally, Men's and Women's Water Polo was a past program running during the Review Period.

Between 1 April 2019 and 5 February 2024, WAIS had the following population:

- 246 staff including 79 sport coaching staff, 74 performance support and servicing staff and 93 administration and management staff.
- 742 athletes including 294 scholarship athletes, 349 training agreement athletes and 99 athletes who held a training agreement and a scholarship during their tenure.

Athlete safeguarding at WAIS is described as athlete care, which is a guiding principle of WAIS' Strategic Plan 2022-2032 Nurturing High Performance. Athlete care means WAIS will act in the best interests of athlete health, wellbeing, and safety. This report will use the term athlete safeguarding unless referring to WAIS policy, practice or documentation which references athlete care specifically.

Safe and Ethical Practice Policy Framework (2023)

In 2019, WAIS introduced the Safe and Ethical Practice Policy Framework (SEPPF). The SEPPF is the overarching document governing safe and ethical coaching, scientific and medical practices to maintain integrity in sport. The following policies seek to govern WAIS process to achieve the purpose of safe and ethical practice:

- WAIS Staff Code of Conduct
- WAIS Athlete Code of Conduct
- NIF Safeguarding Children and Young People Policy (see NIF details below)
- NIF Participant Protection Policy (see NIF details below)
- WAIS Anti-Doping Policy
- WAIS Sports Medicine, Medication and Injections Policy
- WAIS Research and Innovation Policy
- WAIS Supplements Policy
- WAIS Athlete Mental Health Policy
- WAIS Disordered Eating Early Identification and Prevention Policy
- WAIS Concussion Policy
- WAIS Anti-Match Fixing Policy.

The SEPPF was developed to address and prohibit unsafe and/or unethical practices which are available to achieve higher levels of athletic performance. It also recognises that the pursuit of athletic success at an

international level requires an approach that embraces new and emerging knowledge, technology, product, and practice.

The SEPPF recognises that WAIS staff, contractors and consultants are in significant positions of power and authority over the athletes they assist. Therefore, the highest standards of professional and personal integrity must be defined and maintained to ensure athlete wellbeing, and that these positions are not inappropriately used to influence athlete decisions or actions.

The SEPPF is publicly available on the WAIS website.

National Integrity Framework

As recommended by *Sport Integrity Australia's Independent Review into the WAIS Women's Artistic Gymnastics Program (2022)*⁹, WAIS has become the first NIN organisation to formally adopt the NIF, with the adoption effective from 1 January 2024.

The NIF includes the following policies:

- NIF Safeguarding Children and Young People Policy (now considered part of the SEPPF)
- NIF Participant Protection Policy (now considered part of the SEPPF)
- NIF Improper Use of Drugs and Medicine Policy
- NIF Competition Manipulation and Sport Gambling Policy
- NIF Complaints, Disputes and Discipline Policy

Work has been done to adopt the NIF policies, necessitating the commitment and approval of the WAIS Board, along with updates to some existing policies for alignment. At the time of the Review, policies associated with the NIF were yet to be embedded in practice at WAIS.

Athlete management policies

WAIS has athlete management policies which address elements of athlete wellbeing, such as supporting dual career planning, travel, individual athlete performance plans and transitions. These policies include the Athlete Transitions Policy, Athlete Performance Management Policy, Travel Policy and Athlete Benefits Policy.

Athlete safeguarding risks in the high performance sporting context

WAIS are dedicated to the development of elite athletic performance and athlete safety, and with this objective, there are inherent challenges and risks that should be considered to ensure the safety and wellbeing of athletes. Collective learnings and insights from reviews and inquiries into athlete safeguarding, integrity and child safeguarding more broadly have highlighted a number of risks which high performance sporting environments face in Australia. WAIS, like other high performance sporting organisations, may be exposed to the following potential athlete safeguarding risk factors:

- **Sport culture:** There is a risk that high performance sport prioritise winning above all else, fostering a culture that may overlook ethical boundaries and perpetuate damaging behaviours. Power imbalances between coaches and athletes can lead to coercion and compromise athlete safety and wellbeing. Exclusionary practices may alienate certain individuals, while intense public scrutiny can exacerbate stress and anxiety.
- **Pressure to perform and intense competition:** Coaching styles and external pressures, such as parental and spectator expectations, can create risk and oppressive environments that harm athletes physically and psychologically.
- **Physical environment:** Risks within the physical environment include privacy concerns in facilities like change rooms and bathrooms. Inadequate supervision and support during travel and accommodations arrangements may further expose athletes to vulnerability.
- **Online environment:** Athletes face unique risks in the online environment, including cyberbullying, privacy invasion, and potential exposure to harmful people or content.
- **Third party contractors:** Coaches, volunteers and support services which are not oversighted or monitored can lead to potential harm to occur.
- **Vulnerability of athletes:** There is a risk that some athletes, particularly those with limited autonomy or experience, may lack the confidence and decision-making skills necessary to navigate the challenges of elite performance. For example, young athletes or those under training agreements may be particularly vulnerable.

⁹ Sport Integrity Australia, *Western Australian Institute of Sport Women's Artistic Gymnastics Program Review*, April 2022

In Australia, the environment for high performance sports is at a crucial turning point. The nation places high value on celebrating sports achievements, but there is also an increasing acknowledgment of the need to protect athletes. Safeguarding measures are being recognised as essential to maintaining this balance. This Review aims to examine the existing practices of safeguarding governance and culture at WAIS.

Section 3:



Review Framework

3.1 Review Framework

The Review was guided by the Review Framework. The Review Framework was developed at the commencement of the Review to methodically assess the safeguarding culture and governance within WAIS. Its primary objective was to instil consistency throughout the review process, thereby ensuring the Review was transparent and objective.

The Review Framework was informed by better practice methodologies including the Australian Human Rights Commission National Principles for Child Safe Organisations (2018) as well as past reviews such as the *Australian Human Rights Commission Review into Gymnastics*¹⁰, the *Wood Review*¹¹ and *Sport Integrity Australia's Independent Review into the WAIS Women's Artistic Gymnastics Program (2022)*¹². The Review Framework benefits from the collective insights and experiences from those who were involved in these prior reviews.

The Review Framework highlights that the effectiveness of safeguarding culture and governance relies upon essential components, which include building blocks, enablers and outcomes. Each component considers key focus areas. Building blocks lay the foundation for robust safeguarding practices, enablers facilitate their implementation, and outcomes serve as indicators of success. By delineating these components and their associated focus areas, the Review Framework provides a structured approach for reviewing and improving athlete safeguarding. Each focus area is linked to the findings within Section 5.

Focus areas	Details	Link to finding
 <h3>Building blocks</h3>		
Leadership and commitment	Leaders who share a common vision are able to role model and inspire the desired behaviours and values required to create an environment prioritising the safeguarding and wellbeing of all athletes. The organisation is committed to athlete safeguarding and wellbeing, this is embedded in strategy.	Finding 5.1.2 and Finding 5.1.3
Clarity	Policies, systems and processes that support the achievement of safeguarding objectives are documented, communicated and well understood by athletes and staff, including complaint handling policies and procedures.	Finding 5.2.3, Finding 5.3.3 and Finding 5.3.5
Risk and compliance	There are sound risk management processes in place to support the achievement of athlete safeguarding objectives. Legislative and regulatory requirements are understood, reported on and monitored against.	Finding 5.2.1 and Finding 5.3.1
 <h3>Enablers</h3>		
Roles and accountabilities	Mechanisms are in place to ensure people are held to account and there is clarity of roles and responsibilities, decision-making, rights, accountabilities and reporting protocols. There are transparent and unambiguous lines of accountability and responsibility both within the organisation and with external stakeholders.	Finding 5.2.2
Capability and capacity	There is a clear view on the capability needed to achieve safeguarding objectives, athletes and staff are made aware through recruitment, ongoing communication and training. Staff capacity and the achievability of safeguarding capabilities is considered. Key safeguarding programs and projects are prioritised, planned and endorsed appropriately.	Finding 5.4.1 and Finding 5.4.3

¹⁰ Australian Human Rights Commission, *Change the Routine: Report on the Independent Review into Gymnastics in Australia*, May 2021

¹¹ Commonwealth of Australia as represented by the Department of Health, *Report of the Review of Australia's Sports Integrity Arrangements*, 2018

¹² Sport Integrity Australia, *Western Australian Institute of Sport Women's Artistic Gymnastics Program Review*, April 2022


Focus areas	Details	Link to finding
Person-centred approach	Athletes are informed about their rights, participate in decisions affecting them and are taken seriously. Athletes and staff feel comfortable to voice their opinion and raise issues. Diversity and inclusion are championed.	Finding 5.4.1 and Finding 5.4.2
 Outcomes		
Monitoring and reporting	There are transparent lines of reporting, including timely and accurate reporting to the Senior Leadership Team and WAIS Board. Reporting is designed to support oversight and tracking of the achievement of athlete safeguarding objectives.	Finding 5.2.1
Commitment to safeguarding culture	Athletes and staff are committed to safeguarding culture and behaviours. Desired behaviours are rewarded, and undesirable behaviour is sanctioned. Athletes and staff are held accountable by others. Ultimately people feel safe, harm is prevented and responded to.	Finding 5.1.1, Finding 5.3.2, and Finding 5.3.4

Figure 2: Review Framework

Section 4:

Consultation participation overview

Outlined below is information regarding the stakeholders who participated in consultation via surveys, interviews, and focus groups, as well as the limitations associated with the data collected.

4.1 Surveys

A total of 119 current and former WAIS athletes, families of athletes, coaches, support staff, administrative staff, management, Senior Leadership Team and WAIS Board members responded to online, anonymous surveys tailored to their role and involvement with WAIS. Summarised below is a breakdown of survey respondents. Please refer to Section 7 of this report for detailed analysis of the outcomes of the surveys.

Please be aware that due to rounding, the percentages in some tables might not sum up to exactly 100%

Respondent Group	Number of Current Stakeholders (Percentage of Total Survey Respondents)	Number of Former Stakeholders (Percentage of Total Survey Respondents)	Total Stakeholders (Percentage of Total Survey Respondents)
WAIS athletes	26 (21.9%)	38 (31.9%)	64 (53.8%)
Families of WAIS athletes	7 (5.9%)	6 (5%)	13 (10.9%)
WAIS coaches and support staff	13 (10.9%)	11 (9.3%)	24 (20.2%)
WAIS administrative staff	2 (1.7%)	6 (5%)	8 (6.7%)
WAIS management and Senior Leadership Team	3 (2.5%)	4 (3.4%)	7 (5.9%)
WAIS Board members	0 (0%)	3 (2.5%)	3 (2.5%)
Total	51 (42.9%)	68 (57.1%)	119 (100%)

Table 1: Survey Respondents by Respondent Group

WAIS athletes, families of athletes and coaches were asked to select the sport(s) that they, or their family member, participated in or engaged with currently or historically. If applicable, respondents were able to select multiple sports. Summarised below is a breakdown of these responses.

Respondent Sport Program	Total Stakeholders (Percentage of Total Survey Respondents)
Athletics	15 (10.3%)
Women's Basketball	5 (3.4%)
Canoeing	15 (10.3%)
Cycling	6 (4.1%)
Diving	1 (0.7%)
Hockey	9 (6.2%)

Respondent Sport Program	Total Stakeholders (Percentage of Total Survey Respondents)
Netball	3 (2.1%)
Rowing	19 (13.1%)
Sailing	11 (7.6%)
Swimming	13 (9%)
Wheelchair Basketball	7 (4.8%)
Individual Athlete Program	20 (13.8%)
Other*	21 (14.5%)
Total	145 (100%)

Table 2: Survey Respondents by Respondent Sport Program

*The respondents who selected “other” were from the following programs:

- 16 respondents noted water polo.
- 2 respondents named additional sports which have not been disclosed to protect the anonymity of these participants.

WAIS athletes and families were asked to select the option that best describes their relationship with WAIS. Summarised below is a breakdown of these responses.

Respondent involvement with WAIS	Number of Current Stakeholders (Percentage of Total Survey Respondents)	Number of Former Stakeholders (Percentage of Total Survey Respondents)	Total Stakeholders (Percentage of Total Survey Respondents)
WAIS Scholarship athlete	19 (24.7%)	26 (33.7%)	45 (58.4%)
WAIS Training Agreement	11 (14.3%)	18 (23.4%)	29 (37.7%)
WAIS Visiting athlete	2 (2.6%)	0 (0%)	2 (2.6%)
Other - WA Connect Grant (WACG) athlete	1 (1.3%)	0 (0%)	1 (1.3%)
Total	33 (42.9%)	44 (57.1%)	77 (100%)

Table 3: Survey Respondents by Respondent Involvement with WAIS

4.2 Focus groups and interviews

A total of 47 interviews and focus groups were conducted between November 2023 to March 2024 with WAIS athletes, including children and young people, families of athletes, staff and Board members. A total of 132 people participated, with 101 of those participating through focus groups, and 31 participating through interviews. Summarised below is a breakdown of participation by the respondent group. Please refer to Section 6 of this report for detailed analysis of the outcomes.

Respondent Group	Number of Current Stakeholders (Percentage of Total Respondents)	Number of Former Stakeholders (Percentage of Total Respondents)	Total Stakeholders (Percentage of Total Respondents)
WAIS Athletes	68 (51.5%)	4 (3%)	72 (54.5%)
Families of WAIS Athletes	2 (1.5%)	3 (2.3%)	5 (3.8%)
WAIS Coaching and Support Staff	23 (17.4%)	4 (3%)	27 (20.4%)
WAIS administrative staff	4 (3%)	2 (1.5%)	6 (4.5%)
WAIS management and Senior Leadership Team	10 (7.6%)	1 (0.8%)	11 (8.4%)
WAIS Board members	8 (6.1%)	3 (2.3%)	11 (8.4%)
Total	115 (87.1%)	17 (12.9%)	132 (100%)

Table 4: Focus Group Respondents by Respondent Group

4.3 Data Limitations

The consultation process played an essential role in understanding the diverse perspectives of WAIS stakeholders. However, it is important to note the statistical significance of the consultation results could not be fully ascertained, due to limitations in available data. Statistical significance is calculated by using a statistical test to determine if there is a meaningful difference between groups or if an observed pattern in data could have occurred due to chance. To calculate statistical significance the sample data, sample size, mean and standard deviation of each group and the significance level is needed.

The following limitations were noted:

- Complete information about the overall population for each stakeholder group, such as families of athletes, was not available and for this reason the statistical significance and the extent to which the results are representative of WAIS more broadly could not be determined.
- Some individuals may have engaged with the consultation process more than once, by completing the survey as well as participating in interviews or focus group discussions. The impact of this unknown variable affects the sample data.
- Given that the survey was made publicly accessible and anonymous, vetting of individuals, beyond the vetting questions embedded into the survey, was not possible. Despite this, reasonable steps were taken to verify that participants had a genuine connection to WAIS and the Review Period while simultaneously ensuring the protection of their identity and privacy.

- There was no burden of proof placed upon participants to validate their identities or the authenticity of their views. The process was grounded in a trauma-informed approach and a foundational trust that participants were providing sincere and honest feedback, and their contributions were accepted and included in good faith.
- Additionally, some individuals who expressed interest in focus groups or interviews were invited to take part in the survey.
- For consultation with athletes under the age of 18, processes to obtain parent and guardian consent were embedded into the approach. Athletes under the age of 18 who did not receive consent could not participate in consultations.
- KPMG conducted a group consultation with the WAIS Board, at which time two members of the current WAIS Board were unavailable to attend and declined KPMG's invitation for one-on-one interviews following the group consultation.

Section 5:

Findings

How to read this section

The structure of the findings is organised into five main parts: context, findings, data collected, impact, and recommendations, see details below:

- Context outlines background information, including better practice. This provides the setting and outlines the conditions under which the data was gathered and analysed. Context also provided an overview of current state process and practices at WAIS.
- Findings outline the results of the analysis and overall strengths and areas for improvement.
- Data collected is the analysis of all data relating to the finding across each method of collection where relevant. This includes the survey, interviews and focus groups, site visits and complaint analysis.
- Impact details the effects or potential effects the findings have had or may have.
- Recommendations suggests possible actions, solutions, or future directions based on the findings.

Each finding links to focus areas of the Review Framework, see Section 3 for further details.

5.1 Safeguarding culture and commitment

Organisations play a pivotal role in fostering a safeguarding culture and enhancing commitment by strategically prioritising athlete safeguarding. Through a well-articulated strategy, an organisation defines its core values and sets clear safeguarding objectives. The strategy guides the collective efforts of staff by instilling shared values, beliefs and practices, therefore defining the organisation's culture. By delineating these priorities, a clear strategy fosters a strong commitment to safeguarding, enabling leaders to role model and reinforce ideal behaviours within the organisation.

Safeguarding culture and commitment is driven by a strategy which prioritises the need to keep athletes safe from harm, abuse and exploitation.

5.1.1 Most athletes value their time at WAIS.

Context

Each year WAIS supports over 200 elite level athletes. Athletes can be on scholarship agreements or training agreements. The following scholarship agreements exist at WAIS:

- Sport Program Scholarship (SPS) is for athletes who are currently supported by a WAIS Sport Program. The scholarship holder is coached by a WAIS employed coach and can access performance services, travel, and medical assistance in line with the athlete's categorisation and the WAIS athlete benefits policy.
- Individual Athlete Scholarship (IAS) is for athletes who are currently receiving support from WAIS but train in an externally coached program. The scholarship holder does not train in a WAIS Sport Program daily training environment with a WAIS coach. They are offered coach fee relief, performance services, travel and medical assistance in line with the athlete's categorisation and the WAIS athlete benefits policy. Athletes on IAS are considered either part of the Individual Athlete Program (IAP) or part of multiple sport programs including Swimming, Athletics, Cycling or Rowing.

Each scholarship athlete at WAIS is categorised on a scholarship level. The level of scholarship determines the amount of benefits and support an athlete is entitled to, including financial support.

Training agreements are used to assist in strengthening the Western Australian performance pathway. WAIS has introduced Training Agreements to allow athletes to train in the WAIS daily training environment with WAIS scholarship athletes. There are three types of training agreements:

- pathway to scholarship
- training partner
- visiting athlete.

Findings

Strengths

Majority of current athletes participating in the Review expressed an appreciation for their experiences at WAIS, expressing a deep regard for WAIS' role in their professional development. They perceived WAIS as instrumental in shaping their future sporting careers, viewing it as a vital conduit toward achieving their goals and aspirations.

Current athletes attributed these feelings to the guidance provided by their coaches and support staff, as well as the support systems that WAIS offers.

Areas of improvement

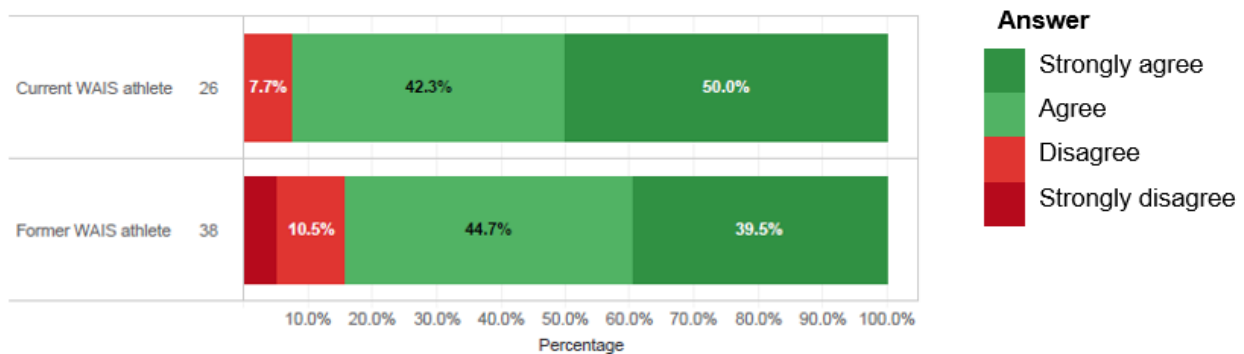
Whilst athletes shared that they valued their time at WAIS and the benefits associated, some also shared there were times where some athletes felt unsafe.

Data collected

Survey

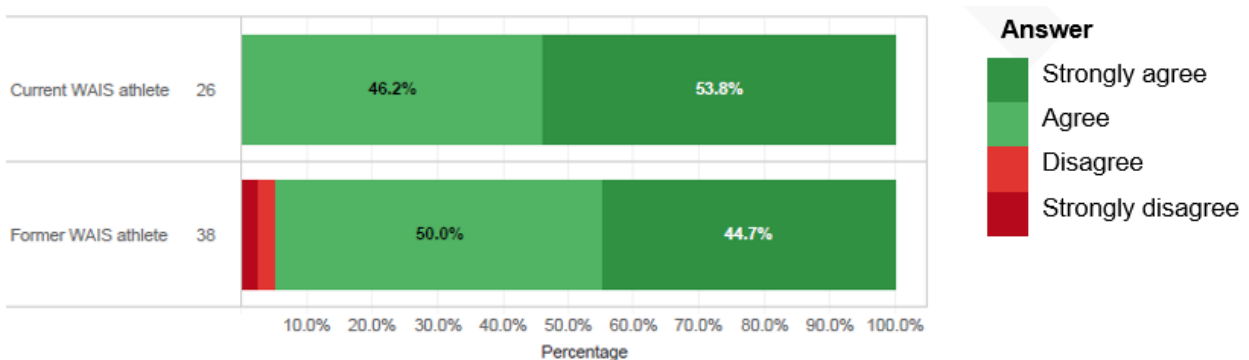
Majority of athletes and their family member surveyed felt coaches and support staff cared about their wellbeing and safety. This was explored further in interview and focus groups, where current athletes spoke about how coaches and support staff are committed to creating positive environments for their athletes.

- 45 out of 64 (70%) current and former athletes surveyed agreed or strongly agreed that in general, they felt that coaches and WAIS staff care about their wellbeing and safety.
- 11 out of 13 (85%) family members of current and former athletes surveyed agreed or strongly agreed that in general, they felt that coaches and WAIS staff care about their family member's wellbeing and safety.
- The graph, below, illustrates the responses to the following survey question: I feel safe from harm in the physical environment where I train.



Graph 1: Athlete's sense of safety in the physical environment.

- The graph, below, illustrates the responses to the following survey question: I feel safe from harm when traveling with coaches.



Graph 2: Athlete's sense of safety when traveling with coaches.

Athletes and their family members surveyed generally felt safe during their time at WAIS. However, there were instances where athletes did not feel safe. The following was highlighted through the survey.

- Athletes and families were asked if they or their family member had ever felt unsafe while at WAIS, of the 77 athletes and family members surveyed:
 - 51% shared they did not feel unsafe at WAIS
 - 31% felt they were forced to overtrain
 - 26% reported feeling body/weight shamed
 - 26% felt uncomfortable around a WAIS staff member.
 - 25% felt threatened emotionally
 - 21% felt they might injure themselves
 - 14% felt bullied during their time at WAIS
 - 14% felt isolated from the world outside their sport
 - 16% felt they were being forced to train with injuries
 - 16% felt they would receive punishment for not meeting coaches' expectations
 - 9% felt they were harassed
 - 8% felt concerns about being given physical punishment
 - 5% felt they were getting unwanted attention
 - 4% felt discomfort around medical staff
 - 3% felt they were inappropriately touched
 - 3% felt they received inappropriate attention
 - 1% felt threatened physically
 - 1% felt uncomfortable around another athlete
 - 1% felt uncomfortable around a parent/spectator.

Interviews and focus groups

The consensus among most athletes was that coaches and support staff exhibited a commitment to providing support and a supportive environment for athletes. Some athletes described how coaches and support staff were committed to promoting athlete livelihood 'outside of the context of performance'. Most current athletes noted that they hadn't experienced feelings of being unsafe while at WAIS. When asked what makes them feel safe at WAIS, current athletes shared that coaches and support staff, relationships with their peers, respecting boundaries, staff treating athletes as individuals irrespective of their performance and having clear communication make them feel safe.

In interviews and focus groups, most scholarship athletes described how they have access to multidisciplinary support staff, including athlete wellbeing and engagement officers, physical preparation, sports medicine and sport science staff, who provide tailored and person-centred guidance based on the individual's unique circumstances. Some athletes described how having access to support staff 'makes a big difference' as coaches and support staff encourage athletes to balance their sporting commitments, work and studies.

Most current athletes, when asked what makes them feel unsafe or hypothetically unsafe at WAIS, stated practices that may endorse exclusion, lack of genuine athlete consultation and input, an athlete's holistic circumstances not being considered, staff being dismissive when concerns are raised, and private conversations being held in front of others would make them feel unsafe. Some athletes shared examples of feeling unsafe while at WAIS which included bullying, insults, verbal abuse, yelling, unwanted attention and touching.

Current coaches and support staff stated in the five years preceding the Review, there had been 'more focus placed on athlete care'. Most coaches and support staff described how mental health and disordered eating had become an emerging priority across high performance sport, with some coaches and support staff describing how they applied a 'person first, athlete second approach' to coaching.

Impact

Feeling safe allows athletes to perform better and engaged more deeply in their training. It builds trust within the team and towards coaches, enhances psychological wellbeing, and decreases the risk of burnout, stress or

trauma. Safe environments foster resilience, promote longevity in sports, contribute to a positive team culture, encourage personal growth, and support the inclusion of diverse individuals.

Recommendations

To ensure athletes continue to value their time at WAIS, the recommendations of this Review should be implemented. See Recommendations 5.1.2.1 to 5.4.3.1.

5.1.2 Athlete safeguarding should be promoted as an integral part of the strategic agenda.

Context

Strategy is the embodiment of an organisation's core priorities and direction. A strategy is the blueprint for making pivotal decisions, grounded in a deep understanding of what's most important for an organisation. A coherent strategy is linked to an organisation's culture, as it is the shared values, beliefs and practices that collectively empower and inspire staff to execute the strategy effectively and drive the organisation towards its envisioned future.

The strategic outlook, including key priorities, purpose, and goals, should be clearly defined, embedded, and aligned to the strategic agenda of the organisation. The chosen governance model and supporting governance arrangement form part of the broader safeguarding strategy and directly support the achievement of the strategy. Refer to Finding 5.2.1 for more information regarding governance.

A safeguarding framework outlines the overarching approach to achievement of the safeguarding agenda, that is, how policies, processes, people and systems come together to safeguard athletes. The safeguarding framework is the blueprint for how the organisation implements and embeds safe people, safe processes and safe practice.

In the context of high performance sport, organisations must balance the priority to win, or achieve performance outcomes and results, against the importance of athlete safeguarding. Rather than viewing these priorities as conflicting, it is important to recognise that a strong commitment to the wellbeing and safety of athletes can be a catalyst for improved performance.

WAIS' strategic agenda is documented in the WAIS' Strategic Plan 2022-2032 Nurturing High Performance, setting the organisation's priorities and goals. The Strategic Plan outlines WAIS' purpose, vision and guiding principles to support athletes achieve success on the world stage, to ensure the best interests of athletes and to enhance the high performance sports system in Western Australia. The plan further highlights the strategic priorities of WAIS, which include strengthening talent pathways, elevating athlete care and enhancing sport diversity.

A draft Integrity and Athlete Care Strategy 2024-25 exists which outlines WAIS' plan for integrity and athlete care focusing on four pillars: educate, engage, empower and improve. Each pillar highlights key objectives and associated impact indicators. The 2024 Integrity Operational Plan documents key activities aligned to the pillars of the draft Integrity and Athlete Care Strategy 2024-25.

The Safeguarding Children and Young People Policy (2024) Annexure C includes WAIS' child safe commitment statement which states WAIS' commitment to the safety, wellbeing and empowerment of all children and young people involved.

Findings

Strengths

Athlete care is included in WAIS' Strategic Plan 2022-2032 Nurturing High Performance, noting 'WAIS will act in the best interests of athlete health, wellbeing, and safety.' WAIS has publicly committed to the Win Well Pledge under the HP2023+ Strategy. WAIS has also publicly committed to child safeguarding aligning to a key requirement of the National Principles.

Areas for improvement

Within WAIS, the lack of clearly defined athlete safeguarding priorities fosters a culture where performance takes precedence over athlete wellbeing and safety. The following was noted.

- An athlete safeguarding strategy which outlines WAIS safeguarding goals and direction is in draft and not yet endorsed.
- Whilst, WAIS has articulated a commitment to child safeguarding, they have not extended this commitment to include athlete safeguarding; that is, how WAIS commits to the physical and psychological safety of all athletes regardless of age. There is a noticeable absence of evidence or documentation demonstrating the practical implementation of this commitment.
- Safeguarding athletes as a priority is not disseminated and embedded throughout the organisation. As a strategy is not defined at the organisation level, prioritising safeguarding cannot occur at the people level. Many coaches, support staff and athletes described the difficulty of balancing performance outcomes with athlete safeguarding. For example, staff performance review templates evidenced that key performance indicators (KPIs), including scholarship retention and performance results, were items for discussion whilst athlete safeguarding was not documented as a core requirement. Refer to Finding 5.3.4 for more information regarding

performance management at WAIS. Additionally, evidence that safeguarding athletes is considered in the allocation of resources was not provided, for example work force planning which considers investment in psychologists and athlete wellbeing and engagement advisors.

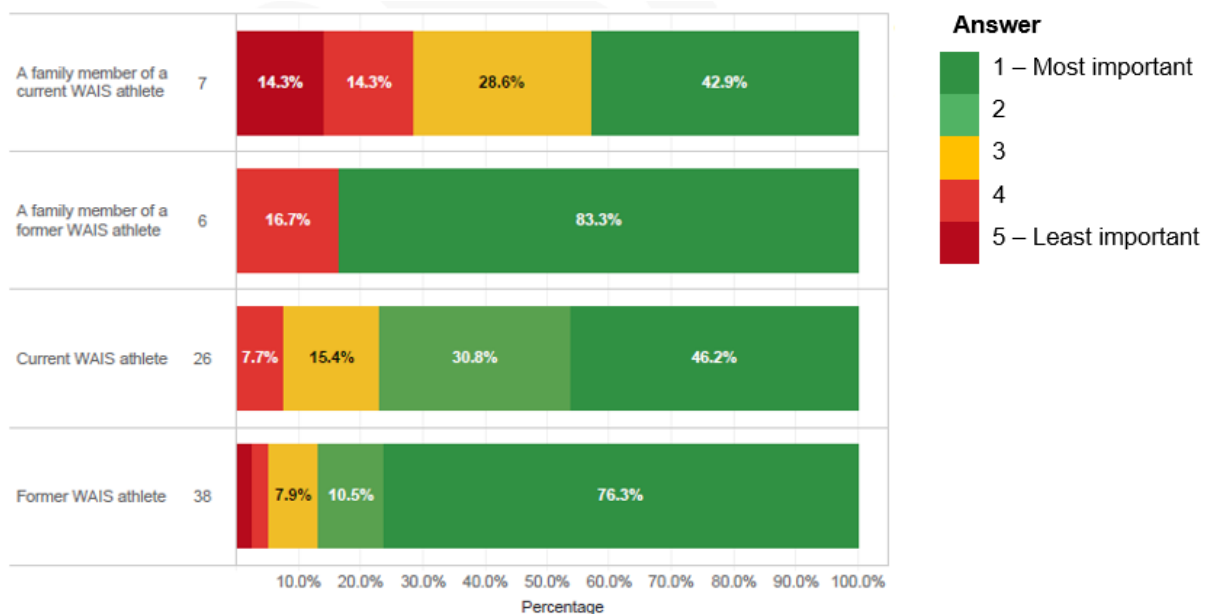
A safeguarding framework is not in place to formally document how all safeguarding processes connect to support safe, athlete-centric outcomes.

Data collected

Survey

Athlete safeguarding was generally seen as important by individual staff members, however performance outcomes and results were overwhelmingly prioritised by the organisation, and this was consistent with the perception of athletes and families.

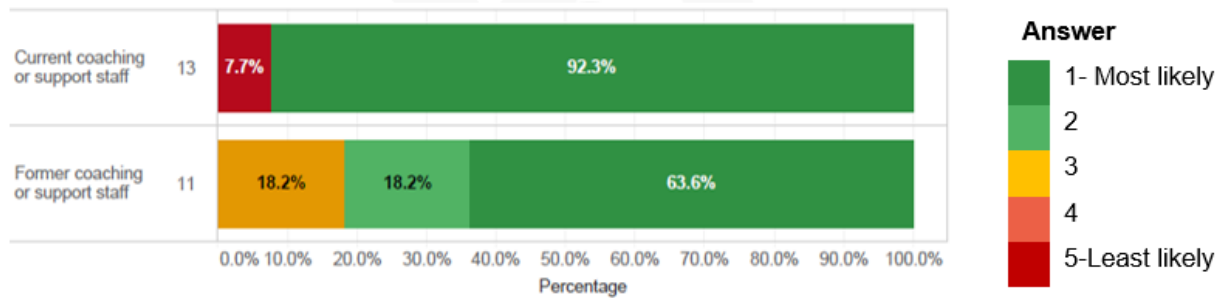
- Current and former athletes and families surveyed were asked to rank the following factors in order of importance according to what they believe WAIS values: high performance results, athlete safety, athlete happiness, physical fitness, and personal development and growth outside of sport. These factors were rated 1 – Most important to 5 – Least important. The following was noted.
- Majority of athletes and their family members rated **high performance results** as number 1 (49 out of 77). See graph below:



Graph 3: Percentage breakdown by respondent category for those who rated high performance results as most important.

- Majority of athletes and their family members rated **physical fitness** as number 2 (35 out of 77).
- Majority of athletes and their family members rated **athlete safety** as number 3 (22 out of 77).
- Majority of athletes and their family members rated **personal development and growth outside the sport** as number 4 (26 out of 77).
- Majority of athletes and their family members rated **athlete happiness** as number 5 (27 out of 77).
- Current and former coaches and support staff surveyed were asked to rank the following factors in order of importance according to what they believe WAIS values, with 1 being the most important and 5 being the least important, the following was recorded:

- Majority of coaches and support staff rated athlete safety as number 1 (19 out of 24). See graph below:



Graph 4: Percentage breakdown by respondent category for those who rated athlete safety as most important.

- Majority of coaches and support staff rated athlete happiness as number 2 (12 out of 24).
- Majority of coaches and support staff rated high performance results as number 3 (9 out of 24).
- Majority of coaches and support staff rated personal development and growth outside the sport as number 4 (8 out of 24).
- Majority of coaches and support staff rated physical fitness as number 5 (14 out of 24).
- 21 out of 24 (87.5%) current and former coaches and support staff surveyed describe the athlete safety culture as positive.
- 16 out of 18 (89%) current and former administrative staff, management and the Board surveyed describe the athlete safety culture as positive.
- Two current and former athletes responded to a free text field question asking about feeling unsafe while at WAIS and noted the following:
 - 'my coach's success was more important than my physical and mental wellbeing'
 - they were 'unsupported, [there was a] lack of respect, ignored, isolated from training with my team'.

Majority of staff and the WAIS Board agreed that athlete safeguarding was considered in strategic documents.

- 18 out of 24 (75%) current and former coaches and support staff surveyed agreed or strongly agreed that athlete safety and wellbeing were included in WAIS' strategy and strategic documents. 6 out of 24 (25%) current and former coaches and support staff surveyed were unsure if it was included.
- 17 out of 18 (94%) current and former administrative staff, management and members of the WAIS Board surveyed agreed or strongly agreed athlete safety and wellbeing were included in WAIS' strategy and strategic documents.

Focus groups and interviews

Members of the current Senior Leadership Team and WAIS Board agreed athlete care and safety has been a key consideration in strategic planning discussions. The current WAIS Board noted they'd like to strengthen the strategic plan as it is currently performance based with athlete care being a lower priority.

Most coaches and support staff agreed that it is difficult to balance the strategic focus on performance outcomes with athlete safeguarding.

- Coaches and support staff interviewed described perceived pressures associated with WAIS' funding model, directly correlating the number of medals won with the level of funding received, which ultimately set the tone for the prioritisation of performance results above all. When clarified with management, it was noted that this perception was a misrepresentation of how funding was allocated across programs. Some coaches and support staff shared that funding cuts or program termination was frequently cited as a coercive tactic to drive performance.
- Whilst coaches and support staff understood that they have a duty of care to keep athletes safe, confusion pertaining to how to effectively balance performance and safeguarding was evident during interviews and focus groups.

- Additionally, there is a perception among coaches and support staff that job security is linked to performance results.

Additionally, most coaches and support staff described how having more staff to support with safeguarding functions will allow WAIS to apply a 'proactive, rather than a reactive approach' to addressing athlete safeguarding. Some coaches and support staff described how they were consistently increasing their case load and coming up with 'creative ways' to ensure that athletes can access the supports they require.

Some athletes highlighted how there is an emphasis on results, even if only a perceived emphasis, which is deeply ingrained in the culture where securing funding and program stability hinge on achieving success.

- One athlete stated, 'WAIS gets funding because of results.'
- One athlete described feeling 'frustrated and belittled' as they felt they were a 'KPI' and 'just a number' for funding purposes and not provided with the appropriate supports.
- Some athletes further described how this impacted upon the culture of raising concerns at WAIS, with some participants describing how historically the culture was to 'not talk about anything or complain about anything' due to concerns that this may impact upon team performance or scholarship tenure. For further information regarding WAIS' current and historical complaints handling process, refer to the Finding 5.3.2 and 5.3.3 of this report.

Desktop review

- WAIS Strategic Plan 2022-2032 Nurturing High Performance is focused on performance.
- Draft Integrity and Athlete Care Strategy 2024-25 was not endorsed or implemented at the time of the Review.
- WAIS Annual Report (2022) reports on WAIS' athlete care target of 'growing our capacity to consistently meet our goal for athlete satisfaction of >80% on the WAIS athlete care survey'. However, the annual report did not state if the goal was met. It did mention that athlete wellbeing data reflected societal trends of increasing challenges to mental health and personal wellbeing.
- No evidence was provided to demonstrate how WAIS conducts resource/workforce planning or allocation. However, WAIS did demonstrate examples of the application of organisational resources that support athlete safeguarding. This includes the introduction of the Integrity and Safeguarding Manager role, and deployment of athlete wellbeing and engagement staff, and psychologists.

Impact

Without a safeguarding strategy which prioritises safeguarding of all athletes as a key objective of WAIS, there is a risk that decisions regarding athlete safeguarding may be deprioritised. This could result in safety, wellbeing or concerns relating to athletes being deprioritised over results and performance outcome. For example, one former athlete described experiences of being asked by a member of WAIS management to remain in a program to ensure performance results despite voicing a desire to retire for wellbeing reasons.

Placing high emphasis on performance results over athlete safeguarding poses a risk to WAIS and its athletes. There is a risk that athletes are hesitant to voice concerns or complaints, a culture is developed which neglects athlete safeguarding, leaders lack the necessary information to make informed decisions, and a heightened risk of harm, abuse and exploitation occurring.

Recommendations

5.1.2.1 Set WAIS' athlete safeguarding strategic objectives and priorities.

Develop a cohesive and defined WAIS' athlete safeguarding strategy which documents the purpose, role and objective of athlete safeguarding at WAIS, including:

- WAIS' commitment to preventing and protecting their athletes from harm, abuse and exploitation.
- The outcomes the strategic objectives and prioritises will target, for example what athlete-centric outcomes will be a focus for WAIS.
- How WAIS will achieve their athlete-centric outcomes and what metrics WAIS will use to monitor these outcomes. Refer to Recommendation 5.2.1.2 for more information regarding metrics and reporting.
- Alignment to the broader organisational strategy and priorities.

Embed the WAIS' athlete safeguarding strategic objectives and prioritises into WAIS' athlete safeguarding framework, see Recommendation 5.1.2.2.

5.1.2.2 Develop an athlete safeguarding framework.

Implement a safeguarding framework which outlines WAIS' overarching approach to the achievement of the safeguarding strategy. This should be a tool which clearly delineates how policies, processes, people and systems come together to safeguard athletes. Further, ensure the implementation of the NIF policies in full, including documentation of procedures.

The framework should document WAIS' approach to achieving the safeguarding strategy, including:

- how safeguarding is governed, and the model applied, refer to Finding 5.2.1 for more information
- policies, procedures and guidance documents are used to support safeguarding athletes, refer to Finding 5.2.3 for more information
- who is ultimately accountable for safeguarding and all key roles and responsibilities, refer to Finding 5.2.2 for more information
- safeguarding strategies which are embedded across the organisation
- systems used to support safeguarding process and practice.

5.1.2.3 Communicate and clarify WAIS' commitment to athlete safeguarding.

WAIS should further communicate and clarify WAIS' commitment to athlete safeguarding to the WAIS community, including ensuring the effectiveness and age appropriateness of these communication channels. For example, posters should be made available in communal WAIS facilities for athletes, whilst information regarding WAIS' athlete safeguarding commitment should be made available online for families of athletes.

5.1.2.4 Develop a targeted approach to workforce planning to ensure athletes can be supported.

Ensure safeguarding considerations are integrated into workforce planning activities, such as staffing projections, succession planning, and talent development initiatives. Allocate sufficient resources for ongoing safeguarding training and support programs to ensure that staff members are equipped to fulfill their safeguarding responsibilities effectively. Anticipate and address any potential gaps in safeguarding expertise or capacity within the organisation through targeted recruitment, training, or external partnerships.

5.1.3 Leaders should role model and inspire behaviours which prioritise athlete safeguarding.

Context

Managers and leadership are expected to set a good example, as their conduct sets a precedent for the rest of the organisation. Role modelling serves as a foundational element in fostering a safe, supportive, and respectful environment within any organisation. Through this practise, adults exemplify behaviours that embody respect, fairness, and compassion towards both children and their peers. Beyond compliance with policies and procedures, effective role modelling involves personal conduct that exemplifies and reinforces the organisation's core values.

Role modelling cultivates trust and encourages positive behaviours among staff, shaping an organisational culture that prioritises and upholds athlete safeguarding. Role modelling is instrumental in delineating acceptable behaviours and what is expected within an organisation. The organisation's code of conduct and education should articulate the specific behaviours and values to be role modelled, ensuring that expectations are clear and people who do not role model the expected behaviours can be held to account.

Findings

Strengths

Survey data found that WAIS coaches and support staff, that is, staff which are athlete facing, are committed to promoting safe environments for athletes with a focus on the wellbeing of athletes. The current WAIS Board have made public commitments to the focus and improvement of athlete safeguarding through adoption of the NIF, commitment to the Win Well Pledge under the HP2023+ Strategy and acceptance of the Sport Integrity Australia WAIS Women's Artistic Gymnastics Program Report Recommendations.

Areas for improvement

Whilst a perception of athlete safeguarding role modelling was identified within the survey, it was noted through focus groups and interviews that athletes and staff could not identify how safeguarding was role modelled. The following was noted:

- Management and the Board are not integrated into the daily training environment therefore there is a lack of observable behaviour to support how athlete safeguarding is role modelled by this group.
- Several complaints were highlighted where concerns around safeguarding were either dismissed or not adequately addressed. This has undermined the view of the individuals as role models for safeguarding. Refer to Finding 5.3.3 for more information on how complaints are handled at WAIS.
- Examples of leaders who did not take responsibility for their actions and were not held to account was shared; this demonstrates that safeguarding role modelling was not occurring. See Finding 5.3.4 for how WAIS hold people to account.
- Athletes were not involved in decisions affecting them and not empowered within WAIS, demonstrating safeguarding was not role modelled by leadership. Refer to Finding 5.4.1 for more information regarding engagement of athletes.

Data collected

Survey

Most athletes, staff and the WAIS Board surveyed agreed that athlete safeguarding is role modelled at WAIS.

However, this was further explored in interviews and focus groups where there were several current and former athletes who spoke to instances where staff did not role model behaviours aligned to athlete safeguarding.

- 56 out of 77 (72.7%) current and former athletes and families of athletes surveyed agreed or strongly agreed that WAIS staff set a good example for positive athlete safety and wellbeing at WAIS.
- 55 out of 77 (71.4%) current and former athletes and families of athletes surveyed agreed or strongly agreed that WAIS coaches were motivated to create a safe environment for athletes.
- 62 out of 77 (80%) current and former athletes and families of athletes agreed or strongly agreed that WAIS management were motivated to create a safe environment for athletes.
- 19 out of 24 (79%) current and former coaches and support staff surveyed agreed or strongly agreed that WAIS Senior Leadership Team modelled a culture which prioritised athlete safety at WAIS.

- 20 out of 24 (83%) current and former coaches and support staff surveyed agreed or strongly agreed that the WAIS Board model a culture which prioritises athlete safety at WAIS.
- 9 out of 12 (75%) current and former administrative staff and former members of the WAIS Board surveyed agreed or strongly agreed that WAIS Senior Leadership Team modelled a culture which prioritised athlete safety at WAIS.

Focus groups and interviews

Most athletes interviewed, agreed that current coaches and support staff role modelled acceptable behaviours.

However, athletes interviewed also noted that historically coaches did not always role model acceptable behaviours. When interviewed, athletes spoke about the following examples of unacceptable behaviours at WAIS:

- a former athlete described a personal experience where a coach did not role model acceptable behaviours as they experienced bullying and verbal abuse from a former head coach.
- a current athlete spoke about unwanted touching from a former staff member.
- a current athlete described how they felt they 'had no value aside from how fast [they were]' in response to a question asking if WAIS leaders role model athlete safeguarding.
- an athlete noted that WAIS leadership did not role model acceptable behaviours as they did not address an athlete's concerns regarding a WAIS staff member.

Most family members interviewed agreed that WAIS staff did not role model athlete safeguarding, sharing examples of bullying as well as concerns for athlete safeguarding not being taken seriously.

Members of the Senior Leadership Team advised that 'we are all accountable' in ensuring athletes do not experience abuse and harm. However, most coaches and support staff interviewed, stated the Senior Leadership Team and WAIS Board members are not aware of what happens in the daily training environment, particularly where training facilities are external to the WAIS HPSC. Additionally, they were unfamiliar with the WAIS Board and their role as it relates to athlete safeguarding.

Site visits

- It was observed during site visits that coaches and support staff engaged with athletes in a professional manner, commonly in open spaces subject to general surveillance of other athletes, coaches, staff or public.

Impact

The absence of clear role modelling, as perceived by those involved in the Review, by the WAIS Board, Senior Leadership Team and those seen as leaders could have several impacts on WAIS. Without strong leadership and active role modelling of the commitment to athlete safeguarding athletes, families of athletes, coaches, and staff may lose trust and confidence in the WAIS' ability to protect and promote the safety and wellbeing of athletes. There is a greater risk of inadequate responses to safety concerns, which could result in harm to athletes and athletes therefore not being able to perform or compete and the inability to retain and retract athletes and staff. Non-compliance or non-conformance with safeguarding policies and legal frameworks designed to protect athletes could occur. Ultimately contributing to a culture where safeguarding is not prioritised, potentially leading to underreporting and mishandling of safeguarding concerns, complaints and incidents.

Recommendations

5.1.3.1 Enhance athlete safeguarding role modelling.

- Managers and leadership should consistently demonstrate behaviours aligned with the WAIS safeguarding commitment and strategic objectives, serving as role models for others to emulate. This can be achieved by setting specific, observable goals that align with strategic objectives, and by sharing these goals with their teams. As well as offering regular, hands-on training and feedback to ensure staff understand and can follow the safeguarding commitment. See Recommendation 5.1.2.1 for more information regarding WAIS safeguarding strategy.
- Ensure clear expectations are set including expected behaviours and values, through existing mechanisms such as policies and educational initiatives, ensuring all members understand their role in upholding them. See Recommendation 5.2.2.1 and 5.2.3.2 for further information regarding setting expectations.
- Hold individuals accountable for failing to adhere to the expected behaviours, using the WAIS policies and procedures as guidance for appropriate action. See Recommendation 5.3.4.2 for recommendations regarding holding people to account.

- Recognise and celebrate individuals who consistently demonstrate exemplary behaviour, reinforcing the importance of role modelling within WAIS.

5.2 Governance

Strong foundations of effective governance require a fit-for-purpose governance model, implementation of governance structures, and the ongoing management and assurance of governance effectiveness. Developing a governance framework, clear roles and responsibilities and a robust policy suite sets the base; appropriate monitoring and oversight maintains the structure; and managing conflict of interest, third parties and data addresses key areas of governance risk.

Governance is critical to athlete safeguarding. It establishes the structures needed to protect athletes from abuse, harm or exploitation and ensures accountability, oversight, compliance, and promotes a culture which prioritises the safeguarding of athletes.

5.2.1 Establish governance arrangements to strengthen accountability, oversight and implementation of athlete safeguarding.

Context

Good governance includes committed leadership, informed and accountable Boards and sub-Board Committees, Executive level accountability and sponsorship, robust monitoring and reporting to support strategic decision making and preventative action, clarity in roles and responsibilities, appropriate governance structures and escalation pathways, risk management and robust policies and procedures.

Enabling mechanisms such as committee structures, targeted reporting and clear decision-making delegations will assist WAIS in embedding safeguarding practices throughout the organisation. Monitoring and oversight of athlete safeguarding is essential to understanding how to prevent harm, protect athletes from harm and enable best outcomes for athletes.

Reporting to governance structures such as the WAIS Board and Senior Leadership Team enable effective, informed decision making, drive accountability and continuous improvement and should be supported by both qualitative and quantitative measures, and those which are inputs (proactive measures taken) and outputs (outcomes being achieved) to the organisation's safeguarding priorities. Good reporting not only considers the outcomes, but monitors critical inputs to a successful, safe and quality athlete experience. This includes, for example, the qualification and training of staff, screening of staff and other leading indicators such as appropriate internal controls to supervise and oversight practice. It also considers outputs such as athlete experience and safeguarding incidents, complaints and feedback.

The following governance structures are in place at WAIS.

- The **WAIS Board**. The Board does not currently operate under a charter or terms of reference; however, the Non-Executive Letter of Appointment (2023) outlines the roles and responsibilities of Board members. Risk is oversighted by the WAIS Board.
- **Two sub-committees** of the WAIS Board, the **Finance and Audit Committee** (formerly the Finance and Risk Committee), the **Remuneration and Nominations Committee** (formerly two standalone committees, the Nominations Committee and the Remuneration Committee). It is proposed, the Remuneration and Nomination Committee will oversee that the WAIS Board is comprised of individuals who collectively are best able to discharge the responsibilities of the WAIS Board and to review the remuneration policy, management and staff remuneration scales and recommend any changes to the WAIS Board. The Finance and Audit Committee will oversee financial management, financial and performance reporting and external and internal audit. Historically, the Nomination, Remuneration or Audit and Risk Committees did hold athlete safeguarding responsibilities.
- The **Senior Leadership Team** comprises the Chief Executive Officer (CEO), Chief Medical Officer, High Performance Sport Research Centre Director, Performance Team Director National, Performance Team Director Podium, Performance Team Director Pathway, General Manager Corporate Services, Integrity and Safeguarding Manager and People and Community Manager.

In addition, Clinical Services Overview meetings, Athlete Mental Health Review meetings and Athlete Mental Health Policy meetings, WAIS Disordered Eating and Early Prevention Policy reviews, and Concussion Policy reviews are undertaken by WAIS Senior Leadership Team and management.

Findings

5.2.1.1 Athlete safeguarding governance model

Since the adoption of the NIF and commitment to the Win Well Pledge, WAIS has yet to establish and document a comprehensive athlete safeguarding governance model which defines how various policies, processes, systems, and people, collectively govern and oversight athlete safeguarding. The following was noted.

- A governance model is not in place whereby the accountability for athlete safeguarding is defined within a hierarchy of responsibility. Governance structures including the WAIS Board, sub-committees of the Board, the CEO and the Senior Leadership Team do not have defined roles, responsibilities and accountabilities for governing and overseeing athlete safeguarding. Currently, charters, terms of reference or position descriptions for existing governance structures do not include athlete safeguarding. Ultimate accountability for athlete safeguarding should be defined for the WAIS Board, CEO and Senior Leadership Team, and Executive sponsorship of athlete safeguarding should be introduced to facilitate accountability and sponsorship at senior levels of the organisation. Refer to Finding 5.2.2 for opportunities to improve clarity in roles and responsibilities for creating and maintaining a safe environment.
- The expected flow of information and pathways for escalation between governance structures are not defined. As a result, governance arrangements, that are fit for WAIS' role, purpose and risk appetite do not exist in a manner that facilitates effective oversighting of athlete safeguarding. Whilst integrity matters have been included in Board agendas more recently, structured and periodic flow of athlete safeguarding information does not exist including embedded standing agenda items and documented pathways of escalation for emerging and high risks, incidents, complaints or breaches related to athlete safeguarding.
- Governance structures require appropriate membership and skill mix to facilitate effective oversight and decision making. Through consultation it was noted that historically the skills mix of the WAIS Board limited the effective challenge and oversight of management. WAIS Board agendas and minutes considered across the review period also indicated inadequate consideration of athlete safeguarding risks. Historically, key governance structures placed reliance on reactive and ad hoc reporting provided at the discretion of the CEO.
- A committee, working group or body with operational responsibility for athlete safeguarding is not convened to facilitate the continuous management of athlete safeguarding. Various teams and directorates across WAIS with athlete safeguarding responsibilities do not convene to collectively support the implementation of athlete safeguarding and the management of athlete safeguarding risks. Whilst some working groups exist which may consider elements of safeguarding, such as the Athlete Mental Health Review meetings, there are no working groups in place to continuously monitor and manage safeguarding risk and obligations at every level of the organisation. Currently, in the absence of such structures, periodic and comprehensive reporting to those charged with governance does not occur consistently through formal lines of escalation.

5.2.1.2 Monitoring and reporting to governance structures

Monitoring and reporting mechanisms and the quality of reporting to governance structures should be improved to support effective and informed decision making, early detection of systemic issues, and to drive accountability, transparency and continuous improvement.

Athlete safeguarding metrics and data is not captured and monitored in a coordinated manner to facilitate effective reporting to governance structures. Therefore, reporting to governance structures over key metrics and data does not occur in a consistent and periodic manner to facilitate monitoring, transparency and accountability for athlete safeguarding performance. The following was noted.

- Athlete safeguarding risks, including mitigation of high-risk or emerging risk areas, are not monitored by the WAIS Board or Senior Leadership Team. Refer to Finding 5.3.1 for more detail.
- Athlete safeguarding incidents are not captured or reported on. Refer to Finding 5.3.5 for more detail.
- Athlete safeguarding complaints are reported on an ad hoc and case-specific basis. There is no data which documents the total number of active or closed complaints at WAIS. Refer to Finding 5.3.3 for more detail.
- Leading and lagging athlete safeguarding indicators are not collected or analysed to provide the WAIS Board or Senior Leadership Team with an indication of the achievement of the organisation's safeguarding strategic priorities. In addition, without trend and root cause analysis over data, WAIS are not able to proactively identify continuous improvement opportunities and align opportunities to WAIS' priority areas.

Without high quality, robust and periodic reporting which aligns to WAIS' athlete safeguarding strategic priorities, the WAIS Board and Senior Leadership Team are not best equipped to identify high risk exposures, challenge management, make informed decisions or support the organisation to continuously improve.

5.2.1.3 Assurance mechanisms and compliance monitoring

There are currently no formalised assurance mechanisms, such as a program of audits, to enable WAIS to identify non-compliance or non-conformance with athlete safeguarding policies, laws and obligations, including child safety requirements.

Whilst WAIS has commissioned reviews into key child safety compliance requirements, such as the Australian Childhood Foundation review of Young Athlete Empowerment and Parent Engagement (2023), assurance activities do not occur across each of the 'three lines of defence', for example:

- While WAIS has adopted the NIF policy suite which includes Working with Children Check (WWCC) policy requirements, there is no formalised process to perform monitoring over WWCCs across the organisation to understand the level of compliance for all relevant staff, volunteers and contractors, and report on this compliance to relevant governance structures. It is noted that WWCC details are captured at a point in time for staff and contractors within a manual staff compliance register.
- WAIS does not perform spot auditing or checking over the WWCC processes including testing the completeness, currency and validity of WWCCs.
- There is no independent review or testing of the operating effectiveness of WWCC key controls.

Additionally, it was observed that some registrations documented in the manual register were noted as expired at the time the register was provided by WAIS in 2024, for example one staff members' dietician registration expired in December 2023 and one staff members' Australian Health Practitioner Regulation Agency (AHPRA) registration expired in November 2023. Whilst these may have been renewed, this cannot be ascertained through the register and there is no monitoring or reporting over compliance requirements.

The process to identify and monitor new or changing athlete safeguarding legislative and regulatory obligations and requirements is not defined. The requirement and responsibility to update the WAIS Statutory and Legal Obligations Register (2023) is also not defined. It is unclear if the Register is complete, accurate and regularly updated. For example, mandatory reporting responsibilities are not documented within the Register and therefore the requirements under the *Children and Community Services Act 2004* are not being monitored. It is unclear who is currently responsible for maintaining the Register and accountable for its accuracy.

Adherence to safeguarding legislative and regulatory requirements involves complying with laws and regulations that have been put in place to protect athletes from harm and abuse. For example, safeguarding legislative obligations include the *Children and Community Services Act 2004* which outlines the responsibilities and actions that must be taken when there are concerns about the safety and wellbeing of children and the *Working with Children (Criminal Record Checking) Act 2004* which requires individuals who work with or care for children in certain capacities to undergo criminal record checks and be cleared by obtaining a Working with Children Check.

5.2.1.4 Management of third parties

Third parties include contracted entities or staff deployed to perform WAIS business functions, who are not formally employed by the organisation on a permanent full-time basis. WAIS engages with a range of stakeholders to deliver services to athletes. These include facility hire arrangements with organisations such as Venues West, collaboration with National and State Sporting Organisations and the National Institute Network, as well as contracted staff such as some coaches, medical and support staff.

A systematic process is not in place to manage, monitor and mitigate the potential risks associated with the engagement of third-party contractors including staff and contracted facilities. The following was noted.

- A listing of all third-party agreements, which documents which contractors perform child-related work, engage directly with athletes or provide services or facilities utilised by WAIS athletes, was not able to be evidenced.
- A defined process is not in place, through policy or guidelines, to engage and manage each type of third-party arrangement to ensure the safety of children and athletes and set the expectations and obligations of the third party. For example, athlete safeguarding, and child safety clauses are not embedded within all third-party contracts and within contracting templates.
- Due diligence checks and reviews are not conducted to ensure third party contractors are adhering to the expectations and clauses embedded within their contracts.
- Athlete safeguarding risks specific to third parties are not captured or monitored. Refer to Finding 5.3.1 for further details.

5.2.1.5 Conflict of interest

Conflict of interest management is vital in a high performance sport environment to maintain integrity and safety of athletes by ensuring decisions are made objectively and independently, without personal bias, and are in the best interest of athletes and the Institute as a whole. Conflicts of interest arise when an individual's personal interests

are perceived to compromise their independence or ethical decision making and are often encountered in the high performance sport environment.

A conflict of interest policy, process or register does not exist for staff, contractors and volunteers. As a result, the following real or perceived conflicts of interest were raised by current and former WAIS athletes, families, coaches and staff.

- When an individual is in a position to coach, supervise or make decisions about the progression and wellbeing of their family members within an organisation or team. For example, a parent who is a WAIS coach and who has a child that is a WAIS athlete.
- When an individual is responsible for handling complaints where they are personally implicated, or the complaint involves a person with whom they have a personal relationship. For example, a staff member handling a complaint about themselves.
- When a staff member is employed by WAIS and also works as an independent contractor for WAIS. For example, a medical practitioner who is employed by WAIS and makes decisions about the utilisation of allied health services, also provides allied health services as an independent contractor.

As no policy or process exists to manage conflicts of interest, Senior Leadership Team and WAIS staff are not required to declare their own potential conflicts of interest and have no oversight over real or perceived conflicts that may be compromising the integrity of WAIS' operations and decision-making processes, directly impacting the safety of athletes. This can result in decreased transparency and accountability within WAIS, loss of trust among staff, athletes and external stakeholders and reputational risks for WAIS.

5.2.1.6 Data governance

Data governance arrangements, including a data governance framework, are not in place to guide the collection, storage, sharing, utilisation or destruction of data, including the formal management, security, quality and ethical usage of athlete data across the Institute. Through the course of this review, the following risks were raised.

- There was no evidence that access to key systems, data and information is appropriately restricted or monitored. For example, the athlete management system (AMS) which holds sensitive and personal athlete information is accessible across and outside of the organisation. Opportunities exist to provide user specific access to need-to-know areas specifically and monitor access and utilisation of information.
- IT security should be prioritised. During the review, staff computer stations in public areas, such as the reception desk were left unattended and logged into WAIS systems.
- Access logs for physical spaces such as the HPSC are not monitored or audited to ensure currency of access granted and appropriateness of access. A specific example was raised by current and former athletes and staff whereby an ex-employee of WAIS retained access to the HPSC and utilised the gym facilities frequently which made athletes and staff uncomfortable. It was noted that this concern, raised by multiple current and former athletes and staff members, was dismissed by former members of WAIS Leadership and only addressed under change of leadership.
- Whilst coaches and staff spoke to the importance of consent, practices to store and utilise athlete performance data including videos or photographs of athletes were inconsistent and lacked guiding policy and procedure.

Poor data governance can lead to data breaches including loss of data, misuse of data or exploitation of data, non-compliance with regulations including privacy laws, and loss of stakeholder trust.

Data collected

Survey

Whilst current and former members of the WAIS Board, Senior Leadership Team and management generally believed they received high quality, timely and accurate reporting. Interviews and focus groups were utilised to expand upon this subject, and it was identified that former WAIS Board members were unaware of systemic athlete safeguarding issues and through review of historic reporting to the WAIS Board and Senior Leadership Team the quality of reporting was poor.

- 8 out of 10 (80%) current and former members of the WAIS Board and WAIS management surveyed agreed or strongly agreed that they do/did receive high quality, timely and accurate reporting on safeguarding issues and risks.

Whilst current and former members of the WAIS Board, Senior Leadership Team and management generally felt confident in the level of oversight they have of safeguarding legislative and regulatory obligations, when explored further through interviews it was identified that awareness and understanding of safeguarding legislative and

regulatory obligations was low. For example, understanding of mandatory reporting obligations for psychologists or medical practitioners amongst stakeholders consulted with.

- 5 out of 7 (80%) current and former management staff surveyed agreed or strongly agreed that they felt confident in the level of oversight they have of safeguarding legislation and regulatory requirements.
- 3 out of 3 (100%) former WAIS Board surveyed strongly agreed that they felt confident in the level of oversight they have of safeguarding legislation and regulatory requirements.

Interviews and focus groups

- Both current and former members of the WAIS Board and management confirmed complaints which posed reputational risk for WAIS were escalated to the attention of the WAIS Board noting this occurred on an ad hoc basis and at the discretion of the CEO. Current members of the WAIS Board agreed that there is minimal data or trend analysis of safeguarding data, such as complaints or incidents, to inform continuous improvement. The current WAIS Board described how bolstering reporting mechanisms will be a priority area for WAIS going forward.
- Current WAIS Board members agreed that there was uncertainty concerning the extent of compliance-related information provided and escalated to the WAIS Board, for example the verification of whether all staff had a valid and active Working with Children Check (WWCCs). Former WAIS Board members indicated confidence obligations were met but could not articulate how this assurance was obtained and the information received to promote this confidence.
- Management advised contracted medical, or support staff must comply with WAIS policies, procedures and training requirements and noted that contracted medical or support staff are treated as WAIS employees. However, a current staff member raised concerns over the independence and suitability of contractors including the currency of credentials including professional qualifications, memberships or accreditations such as first aid or AHPRA registrations.
- Some coaches and support staff raised concerns regarding the management of conflicts of interest at WAIS, noting they believe there are current conflicts of interest present. Management and the WAIS Board agreed there is no conflicts of interest policy or register for WAIS staff and contractors, making it difficult to identify potential conflicts. Some members of the Senior Leadership Team described how conflicts of interest are disclosed upon recruitment. Current WAIS Board members stated that conflict of interest for WAIS Board members are managed by a register overseen by the WAIS Board's Chair.
- Some administrative staff and management noted that access to the HPSC was not monitored, additionally it was noted that data governance needed improvement. One staff member stated, historically within the Review Period, data was not segregated by a need-to-know basis, providing an example of the receptionist being able to access any data if they wanted to. One staff member stated that confidential notes were currently stored outside of the system in personal files.

Desktop review

- WAIS Board agendas and meeting minutes (December 2020, February 2021, March 2021, May 2021, June 2021, October 2023, November 2023, December 2023, February 2024) highlight discussion areas regarding athlete safeguarding such as safeguarding complaints, integrity matters and policy changes. All discussion areas were on an ad hoc basis and no safeguarding standing agenda was able to be evidenced.
- WAIS Audit and Risk Committee agendas and meeting minutes (March 2023, May 2023, June 2023, July 2023) highlight no discussion of athlete safeguarding including athlete safeguarding risks and controls.
- Example reports provided to the WAIS Board include:
 - Safe and Ethical Practice Policy Framework Compliance Report (2023) is to report on annual education and compliance by staff and athletes with the WAIS Safe and Ethical Practice Policy Framework. The report was provided to the Audit and Risk Committee and WAIS Board. It identified that records of athlete induction could not verify that all inductions had been completed.
 - Australian Childhood Foundation Review into Athlete Empowerment and Parent Engagement (2023) provided insight for WAIS into their young athlete empowerment and parent engagement aligning to the National Principles of Child Safe Standards.
- A formalised internal audit plan was not able to be evidenced.
- WAIS Statutory and Legal Obligations Register (2023) outlines legislation relevant to WAIS and corresponding compliance requirements. The Register does not include the *Children and Community Services Act 2004* and the *Working with Children (Criminal Record Checking) Act 2004*. Historically, the former Audit and Risk

Committee was accountable for overseeing policy and compliance requirements for statutory and legal obligations. The committee received an ad hoc update on the current status of WAIS Statutory Requirements and Exemptions Register. Safeguarding legislation was not included. Further, the General Manager Corporate Services Position Profile does not define the responsibility to monitor legislative and regulatory requirements.

- A documented list of all third-party contractors and risk assessments for third parties was not able to be evidenced .
- Third-party contractors who are on Independent Contractor Agreements are documented in the Staff Compliance Spreadsheet. The Spreadsheet captures accreditations which are listed by name only, no corresponding registration numbers are included, and the spreadsheet data is added manually.
- The Board Code of Conduct requires WAIS Board members to openly declare matters of a private interest such as investments, relationships, voluntary work and membership of other groups that may conflict or be perceived to conflict with the member's public duty and duty as a director of WAIS. The Audit and Risk Committee historically, and the Finance and Audit Committee currently, held responsibility for reviewing and monitoring related party transactions and conflicts of interest. There is no evidence of this occurring in Committee agendas and meeting minutes provided for the review period. Further, a conflict of interest policy, register and documented process does not exist for WAIS staff, contractors or athletes.
- Privacy, Confidentiality and Access policy (2022) outlines WAIS' privacy obligations and confidentiality requirements. Examples were provided in interviews and focus groups where this policy was potentially breached, this included examples from staff and athletes where they felt their confidentiality was compromised during the complaint handling process.
- A data retention or record keeping policy does not exist.
- NIF Safeguarding Children and Young People Policy (2024) outlines requirement for photographs and video of children and young people and states WAIS must store images in a manner that prevents unauthorised access by others and must be destroyed or deleted as soon as they are no longer required. However, this has not been implemented and currently does not occur.
- Training Agreement template (2023) requires athletes to agree to letting WAIS film, broadcast, photograph, identify, interview, reproduce or otherwise record your name, image, voice, signature, photograph, likeness, reputation and identity for any reason. Additionally, requirements about medical data and confidentiality are included.

Impact

In the absence of a robust and fit-for-purpose governance framework, supported by appropriate underpinning governance arrangements such high-quality, timely and accurate reporting, WAIS is constrained in its ability to effectively govern and oversight athlete safeguarding, drive accountability and transparency, and to efficiently identify trends, patterns, emerging risks or high-risk exposures. This impacts WAIS' ability to make informed decisions that have a direct and consistent impact to reduce the risk of harm to athletes, demonstrate a commitment to a culture of athlete safeguarding and practice continuous improvement.

Recommendations

5.2.1.1 Establish a governance model and structures that will support the effective oversight of athlete safeguarding.

Document and establish a comprehensive athlete safeguarding governance model which defines how various policies, processes, systems, and people, collectively govern and oversight athlete safeguarding. Define governance structures that will support the oversight of WAIS' athlete safeguarding framework, in line with Recommendation 5.1.2.2. This should include:

- determining the roles, responsibilities and accountabilities of governance structures, and relationships between those structures, committees and management. For instance, it should be articulated how information will flow between governance structures and what information is required through reporting to inform decision making and effective oversight.
- updating charters, terms of reference and position descriptions to embed roles, responsibilities and accountabilities of governance structures.
- establishing or assigning a committee, working group or body with operational responsibility for athlete safeguarding and athlete experience. The body should include appropriate membership from the WAIS Board, Senior Leadership Team and management.

5.2.1.2 Enhance monitoring and reporting to governance structures.

In line with the implementation of an athlete safeguarding governance model, as determined under Recommendation 5.2.1.1, enhance monitoring and reporting to governance structures.

- Define key risks, indicators and measures to be monitored on order to understand athlete safeguarding performance, and progress and achievement of athlete safeguarding objectives and priorities as outlined in the athlete safeguarding framework (see Recommendation 5.1.2.2). This should include appropriate and fit for purpose lead and lag performance indicators and data points to be monitored periodically.
- Establish a structured and systematic processes to analyse and report on risks, indicators and measures. This should include analysis over root cause, trends, patterns or seasonality, as well as lessons learned. There should be comparison to targets and reporting should indicate whether indicators are favourable or unfavourable.
- Define reporting frequency and assign accountabilities for monitoring and reporting on key risks, indicators and measures to governance structures.

5.2.1.3 Formalise processes and mechanisms to identify, monitor and adhere to legislative and regulatory obligations.

Formalise processes to monitor and adhere to legislative and regulatory obligations.

- Key responsibilities for these activities should be included in role descriptions and requirements of key staff members at leadership and management levels. This should include responsibilities to monitor and document changes to legislative, regulatory or compliance obligations, as well as establishing a process to review, evaluate and improve practices to meet these new obligations.
- Mechanisms to communicate any changes to obligations must be defined, including responsibilities for updating the WAIS Statutory and Legal Obligations Register and communicating these changes to governance structures.
- Introduce assurance activities to ensure compliance with athlete safeguarding legislative and regulatory obligations, as well as WAIS policies and procedures. This should consider assurance activities across the three lines of defence.

5.2.1.4 Embed third party contract management.

- Identify and document third parties which engage in child-related work, interact directly with athletes or provided access to the facilities used by WAIS athletes and staff.
- Require contractors to adhere to athlete safeguarding requirements to ensure that they are fostering safe environments for athletes, which involves assessing the potential risks associated with third-party contractors or facilities. Embed athlete safeguarding clauses into relevant third-party contract and agreement templates.
- Actively monitor adherence to athlete safeguarding clauses to ensure third parties are upholding the established standards and consistently meeting expectations.

5.2.1.5 Develop a process to identify, declare, manage and monitor conflict of interest.

- Develop a policy and process that defines conflict of interest obligations and is tailored to the organisational context, risks and high performance sport environment. Ensure the policy addresses all forms of potential conflict and actively communicate the policy to all relevant staff, contractors and volunteers, highlighting the importance of adherence.
- Create mechanisms for consistent and confidential disclosure of potential conflicts, such as specialised forms and designated officers. Encourage a culture of openness where staff feel comfortable reporting potential conflicts without the fear of retribution.
- Assign conflict of interest ownership to a committee within WAIS. Ensure they are responsible for reviewing disclosures and determining whether a conflict exists. Clearly outline procedures for resolving conflicts, which may include the reassignment of duties.
- Implement a comprehensive system for maintaining records of all conflict of interest statements, decisions, and actions taken. Ensure this information is securely stored and accessible for audits and reviews.

5.2.1.6 Enhance data governance.

- Strengthen role-based access controls and permissions to limit access to sensitive data and ensure data is exposed only to authorised staff members. Conduct periodic security assessments and audits to identify and rectify any vulnerabilities in access.
- Develop and document standardised procedures for record creation, classification, storage, retrieval, and disposal, ensuring consistency across WAIS. Develop clear guidelines for how long different types of data should be retained and the conditions under which they should be purged or archived. Document in policy and procedure.
- Provide data security, privacy, record keeping and confidentiality training to all staff and athletes to remain updated on data governance requirements and how requirements relate to their roles.
- Implement monitoring systems that monitor online access to records and physical access of building and sites. Report data through governance structures. Refer to Recommendation 5.2.1.2 for more information regarding monitoring and reporting to governance structures.

5.2.2 Roles, responsibilities and accountabilities for athlete safeguarding should be defined and documented.

Context

The safety of athletes, including children and young people, is not the sole responsibility of any single individual rather, it is a collective responsibility that rests with everyone involved in an organisation. This involves creating and maintaining an organisational culture that prioritises the safety of athletes as an overarching principle. It calls for active engagement and commitment at all levels, from the leadership who set the tone and policies, to the frontline workers who interact with athletes on a daily basis. The concept of shared responsibility is crucial; every member within an organisation must be vigilant and proactive in protecting athletes from abuse, as well as responding appropriately to any concerns or allegations. This collaborative approach is fundamental to creating and sustaining environments where athletes are respected, protected, and empowered.

Findings

Strengths

WAIS staff including members of the Senior Leadership Team described how all members of the WAIS community, including staff, athletes and families, were responsible for keeping athletes safe from harm and abuse. Additionally, several roles are deployed at WAIS that contribute to athlete wellbeing and safeguarding. This includes the Integrity and Safeguarding Manager, athlete wellbeing and engagement staff and psychologists.

Areas for improvement

Roles and responsibilities for creating and maintaining safe environments for athletes, and for preventing and responding to athlete harm, abuse or exploitation, are not defined and documented with sufficient detail and specificity.

- Those responsible, that is, those who must ensure athletes are safeguarded, are not clearly defined. Whilst athletes and WAIS staff felt they were mostly aware of their roles and responsibilities as it relates to athlete safeguarding, responsibilities, accountabilities and reporting obligations were not clearly defined for staff, contractors, volunteers, athletes and families.
- Key roles such as Senior Leadership Team, CEO, WAIS Board, head coaches and support staff do not have any listed responsibilities specific to safeguarding or keeping athletes safe within position descriptions.
- Those accountable, that is those ultimately answerable for the safety of athletes are not defined. It was noted through consultation with staff that ultimate decision-making with respect to safeguarding is not clear. Therefore, reporting lines and processes to escalate concerns or issues to the appropriate level of accountability do not exist, refer to Finding 5.2.1 for further detail.
- Those consulted with and informed about safeguarding practices and outcomes are not defined.

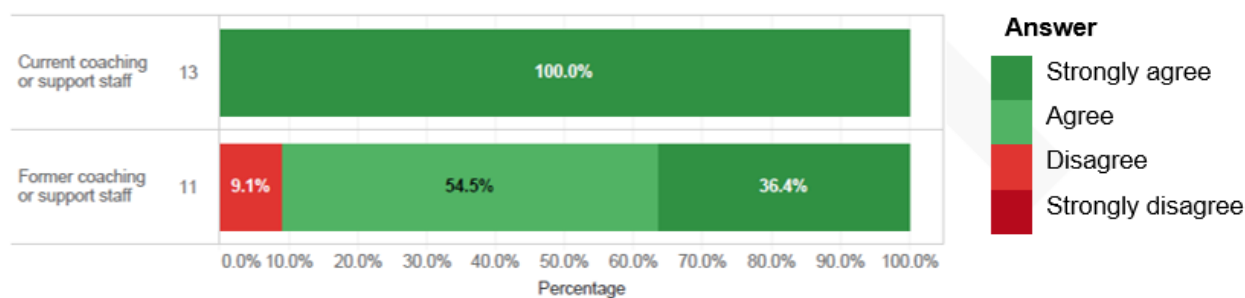
The importance of clarity and delineation of roles and responsibilities across the high performance sport ecosystem was raised by athletes, coaches and support staff. The complexity of the ecosystem raised confusion as to where ultimate accountability lies between WAIS and other sporting bodies including NSOs, SSOs and clubs particularly when athletes are competing, training or travelling outside of the WAIS daily training environment. Lack of defined and documented roles and responsibilities between sporting bodies for key athlete safeguarding functions such as handling complaints, concerns or reports of abuse may lead to potential gaps in protection of athletes as issues go unaddressed or mismanaged.

Data collected

Survey

WAIS staff demonstrated a strong commitment to their role in keeping athletes safe.

- The graph, below, illustrates the responses to the following survey question: I understand my role in keeping athletes safe from harm and abuse.



Graph 5: Understanding of roles in keeping athletes safe from harm and abuse.

- 15 out of 15 (100%) administrative and management staff agreed or strongly agreed that they understand their role in keeping athletes safe from harm and abuse.

Interviews and focus groups

- Most coaches and support staff agreed athlete safeguarding was everybody's responsibility and that they had a role to play in keeping athletes safe. However, some coaches and support staff agreed:
 - that they were unaware who was accountable for making final decisions for issues involving athletes. For example, one staff member described a time where they were unsure if the doctor, coach or wellbeing support staff was able to make decisions regarding an athlete wellbeing and safety.
 - that their role, as it relates to athlete safeguarding, or the role of the Senior Leadership Team and WAIS Board were not defined. One staff member noted, historically, the roles and duties of the CEO and the WAIS Board were not as defined nor separated as they should be. Additionally, some coaches and support staff stated the WAIS Board was ultimately accountable whilst others said the CEO.
- Most of the Senior Leadership Team agreed they were accountable for athlete safeguarding. One staff member advised that 'we are all accountable' in ensuring athletes are free from abuse and harm. Management stated the Senior Leadership Team are responsible for process implementation and the WAIS Board is responsible for setting the policy frameworks.
- Current WAIS Board members stated that everyone is responsible for athlete safeguarding at WAIS. They indicated that accountability sits with the CEO, the Senior Leadership Team and the WAIS Board. Former WAIS Board members were unable to define their responsibilities regarding the oversight of athlete safeguarding and the WAIS Board's role in establishing and ensuring a safe environment for athletes. Some described athlete-facing and frontline staff as solely responsible for the safety of athletes.

Desktop review

- Athlete safeguarding and the responsibility to keep athletes safe is not documented in position descriptions for key staff including the Head Coach, Performance Team Director, Performance Services Program Manager, Performance Health Manager, Physical Preparation Specialists, Sports Scientist, Performance Psychologist, Dietitian, Athlete Wellbeing and Engagement Advisor, Integrity and Safeguarding Manager, People and Community Manager and General Manager Corporate Services. Position descriptions outlined the role purpose, qualifications, knowledge required to perform the relevant role, key working relationships and benchmarked organisational values against associated professional outcomes. Most role profiles are performance driven with no reference to ensuring the safety and wellbeing of athletes:
 - The position description for head coaches reflected that coaches are accountable for ensuring athletes achieve performance targets and retain scholarships.
 - The position description for Performance Team Director states they are responsible for leading a multidisciplinary team of professional coaches and performance service staff to achieve athlete performance goals.
 - The position description for performance psychologists states they are responsible for helping athletes across a variety of sports develop and apply a range of performance related psychological skills.
- Some role profiles (General Manager Corporate Services, Performance Health Manager and People and Community Manager) state that staff must recognise that children and young people require special care and attention to feel safe and that will be committed to protecting and prioritising the safety of children and young people involved in programs and services.
- Position description for the CEO was not able to be evidenced.

- WAIS Board members roles are documented in the WAIS Non-Executive Letter of Appointment (2023) and Role of the Chairperson and Deputy Chairperson (2019), both documents do not include roles and responsibilities relating to athlete safeguarding.
- The SEPPF lists roles and responsibilities related to the implementation of the framework and associated training requirements. The SEPPF notes that the People and Community Manager will act as the complaints manager, however, this role is not documented in the relevant position description.
- The NIF Safeguarding Children and Young People Policy (2024) and Participant Protection Policy (2024) outline some specific athlete safeguarding requirements such as relevant persons (participant, employee, contractor or volunteer) should report any concerns or allegations of prohibited conduct (as per the policy). However, requirements in the policy need to be clearly defined and assigned to roles within WAIS to ensure that the responsibilities are understood and actionable. This does not currently exist. If requirements are not assigned to specific roles, several challenges may arise. This includes lack of accountability, inefficiency, difficulty in enforcement and holding people to account.
- The Staff Code of Conduct states all staff and contractors have a duty of care to ensure that any staff or athlete under their control is provided with a safe environment without risk to their health and wellbeing. It states WAIS staff are not considered mandatory reporters of child abuse by the *Children and Community Services Act 2004*, however, have an ethical responsibility to make a report if they form a belief, based on reasonable grounds in the course of their paid and unpaid work that child sexual abuse has occurred or is occurring. The Staff Code of Conduct does not include the requirement to raise safeguarding complaints or risks. Refer to Finding 5.2.1.4 for more information.
- The Board Member Code of Conduct does not include the WAIS Board's role and responsibilities as it relates to athlete safeguarding or accountability for oversighting and governing athlete safeguarding.
- The Athlete Code of Conduct (2023) and the Athlete Agreement Terms and Conditions (2024) do not outline roles and responsibilities relating to athlete safeguarding including ensuring athletes create safe environments.
- The Scholarship Induction Parents & Partners booklet (2024) does not outline the role and responsibilities relating to athlete safeguarding for the parent, guardian, or family. The booklet provides advice on how to effectively support athletes, emphasising the importance of listening skills for parents and partners. It states that after a demanding athletic event or training session, athletes often need to express their feelings and thoughts, which may include negative emotions such as being upset, frustrated, or angry. The booklet says parents and partners should provide a supportive space for the athlete to vent without attempting to immediately resolve the issues or overreact to what is being said.
- Volunteer roles and responsibilities are not considered within any documents.

Impact

Lack of defined, documented and well understood roles, responsibilities and accountabilities for all involved in the delivery of WAIS services and programs can lead to a lack of clarity and inconsistency in the application of policies, and may create confusion, duplicative or missed critical functions, such as a failure to report or respond to athlete safeguarding concerns and therefore limits the ability to effectively embed core policy into practice. Lack of accountability for athlete safeguarding limits the ability to hold people to account, diminishes organisational trust, decreases overall performance, and increases the likelihood unsafe or unethical practice going unchecked within an organisation.

Recommendations

5.2.2.1 Define roles, responsibilities and accountabilities for athlete safeguarding.

Define roles, responsibilities and accountabilities for athlete safeguarding across all key positions and functions including the Board, Senior Leadership Team, staff, contractors, volunteers, athletes and families. These responsibilities should be embedded into policies, position descriptions, codes of conduct and agreements for athletes and third parties. Policies should clarify and delineate roles, responsibilities and accountabilities of other sporting bodies when supporting WAIS athletes across the high performance sport ecosystem. All position descriptions should include general athlete safeguarding awareness and obligations; and roles which are athlete-facing should have detailed safeguarding responsibilities and obligations defined.

5.2.3 Strengthen and embed athlete safeguarding policies and procedures.

Context

Policies and procedures create clarity in roles, responsibilities and processes and maintain consistent and effective practice across the organisation. Clarity through policy and procedure will ensure harm to athletes is identified, actioned on promptly and appropriate action is taken when an athlete safeguarding issue or concern arises. Policy and procedures promote transparency and consistency and support equitable and fair decision-making.

Well embedded policies and procedures guide all staff, volunteers and contractors to instinctively know and do what is right in the context of safeguarding athletes. This creates an environment where the desired practices become second nature, and compliance is driven by understanding and commitment, thereby fostering a culture which prioritises athlete safeguarding.

In 2019, WAIS introduced the Safe and Ethical Practice Policy Framework (SEPPF). The SEPPF is the overarching document governing safe and ethical coaching, scientific and medical practices to maintain integrity in sport.

In 2024, WAIS adopted the NIF which includes the following policies relating to athlete safeguarding:

- Safeguarding Children and Young People Policy
- Participant Protection Policy
- Complaints, Disputes and Discipline Policy

The NIF Safeguarding Children and Young People Policy and Participant Protection Policy have been included in WAIS' SEPPF (2023). Refer to Section 2.3 which includes information regarding the SEPPF and the adoption of the NIF.

Findings

Strengths

When surveyed, most coaches, support staff and administrative staff confirmed that they were aware of policies and procedures regarding athlete safeguarding.

Areas for improvement

There is currently no comprehensive safeguarding framework which outlines how all policies, procedures, systems and practice work together to achieve WAIS' safeguarding objectives. Refer to Finding 5.1.2 for more information regarding WAIS' safeguarding framework.

WAIS has adopted the NIF policy framework, however additional work is required to ensure the NIF policy framework is contextualised to the WAIS context. The existing policy frameworks have not been consistently updated and necessary supporting procedures, processes or templates have not been developed. The SEPPF and some underlying policies have not been reviewed and updated to integrate with the NIF. Currently, there are inconsistencies or conflicting directives among the policies. The following examples were noted:

- NIF Complaints, Disputes and Discipline Policy (2024) documented process to manage complaints is different to the complaint processes documented in the Athlete and Staff Code of Conducts. Breaches of the Athlete and Staff Code of Conducts may also be breaches of the NIF and therefore policy directives are conflicting.
- NIF Safeguarding Child and Young People policy (2024) states 'an Adult must not sleep alone in the same room as Children/Young People unless they are the parent or have parental responsibility for those Children/Young People' whereas the WAIS Athlete Travel Policy (2022) states 'minor and adult athletes, of the same sex can share an apartment, and bedrooms, but not beds.'
- The Staff Code of Conduct (2023) states WAIS staff are not considered mandatory reporters however NIF Safeguarding Child and Young People policy (2024) states doctors are mandatory reporters.

WAIS have not applied consistent version controls to policies and procedures. The following was noted.

- Review times for updating policy documents vary, with no standard schedule in place. A policy register that documents when policies are scheduled for review, which policies are out-of-date, who is the policy owner, if policy version have been endorsed and the version number was not evidenced.
- Whilst it was noted that the WAIS Board are responsible for endorsing policies, there is no formal endorsement process in place to validate and authorise updated versions. Whilst some policies allow the CEO to approve revisions, historically the WAIS Board have had no oversight of revisions made. It was noted in interviews and

focus groups, that historically management were making policies changes without oversight and endorsement from the WAIS Board.

- The reviewed policy documents lack a consistent version control identifier that distinguishes revisions from their predecessors.
- Although policies are updated, there's a lack of a systematic communication plan to inform stakeholders of these changes. It was noted that the introduction of new policies was communicated but no evidence was provided for changes to existing policies.

All WAIS policies were not available in accessible formats and not translated into varying languages. Most WAIS policies were not available to athletes in age-appropriate formats. A series of factsheets to inform young people of the NIF Safeguarding Children and Young People Policy (2024) and Participant Protection Policy (2024) were developed, however these fact sheets were not clearly visible in public spaces during the Review.

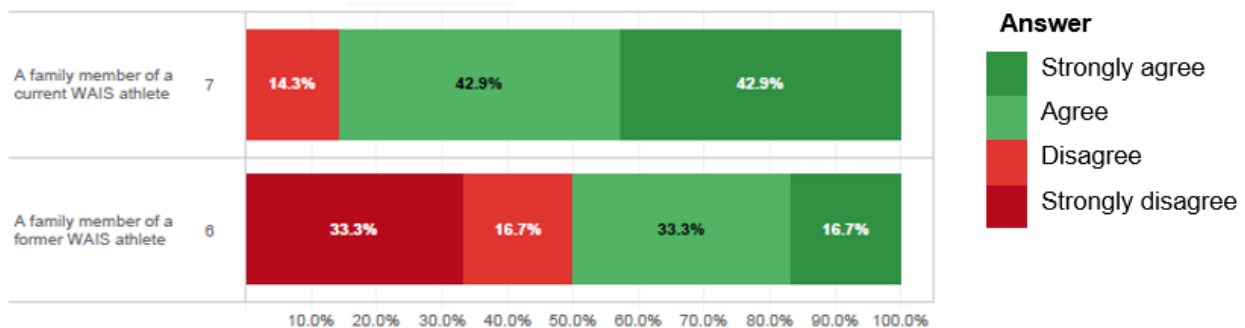
Some athletes and most families were not aware of the policies and procedures guiding athlete safeguarding. Additionally, there is currently no consultation with athletes and their families regarding policies that impact them. Refer to Finding 5.4.1 for more information.

Data collected

Survey

Some athletes and their family members surveyed were not aware of WAIS policies and procedures. This subject was delved into more deeply through both interviews and focus groups where athletes and families interviewed indicated they were made aware of athlete safeguarding policies and procedures via other sporting bodies they were involved with, including NSOs and sporting clubs.

- 37 out of 64 (57%) athletes surveyed responded that they were made aware of policies and procedures supporting athlete safety. Of these athletes, 12 out of 31 (39%) Training Agreement athletes surveyed indicated that they were made aware of policies and procedures supporting athlete safety, and therefore less likely to be aware of policies and procedures.
- The graph, below, illustrates the responses to the following survey question: I am aware of policies and procedures which promote athlete safety and wellbeing at WAIS.



Graph 6: Awareness of policies and procedures which promote athlete safety.

Majority of staff surveyed were aware of policies and procedures which inform athlete safeguarding and wellbeing at WAIS. However, when explored further through interviews and focus groups, coaches and support staff indicated some policies are not fit-for-purpose nor practical.

- 24 out of 24 (100%) coaches and support staff surveyed agreed or strongly agreed that they were aware of policies and procedures which inform athlete safety and wellbeing at WAIS.
- 17 out of 18 (94%) administrative staff, management and members of the WAIS Board surveyed agreed or strongly agreed that they were aware of policies and procedures which inform athlete safety and wellbeing at WAIS.

Focus groups and interviews

- Most scholarship athletes in interview and focus groups agreed policies and procedures regarding athlete safeguarding existed but were not aware of the policies details. Most athletes on training agreements interviewed, agreed they were not aware of athlete safeguarding policies and procedures.
- Some family members in interviews or focus groups agreed that policies existed however raised concerns regarding the consistency of policies and the lack of leadership adherence to organisational processes. Some

family members interviewed agreed they were not provided access to WAIS policies or documents about athlete safeguarding. See Finding 5.4.1 for more information regarding family engagement.

- All coaches and support staff interviewed agreed they had access to policies and that they were required to undertake an induction with a quiz to test their understanding of WAIS policies once a year. Some staff interviewed described this assessment as a 'box ticking exercise', with some staff describing the lack of practicality of policies.
- Most WAIS staff interviewed described how prior to the Review, policies weren't updated often, had poor version control, the policies were long and difficult to understand and that sometimes policies contradicted themselves. Some coaches and support staff agreed that 'procedures might be up to interpretation'. Some family members interviewed stated that policies were updated and changed to suit the needs of WAIS without proper endorsement from the WAIS Board, implementation, or communication.
- Most athletes, coaches, and support staff interviewed agreed that those who are impacted by key policies and procedures, raised that they were not consulted with during the policy design process. Athletes, coaches, and support staff, interviewed, stated that some policies were not fit-for-purpose in the operational environment. For example, it was noted that a travel policy requirement was introduced which made it difficult for athletes to travel to international competitions due to new supervision ratios.

Desktop review

- The NIF was adopted on 1 January 2024. Elements of the NIF are not implemented or embedded in practice. For example, recruitment requirements outlined in the NIF Safeguarding Child and Young People policy (2024) have not been implemented. NIF Complaints, Disputes and Discipline policy (2024) states that WAIS will appoint a Complaint Manager to manager WAIS responsibilities under the policy, but it doesn't include who the Complaint Manager is at WAIS.
- Elements of the NIF and SEPPF are not supported by procedures to contextualise the policies into WAIS environment and do not cover key safeguarding areas such as:
 - Complaints procedures. Refer to Finding 5.3.3 for more information.
 - Incident management procedures beyond reporting any reasonable suspicion or knowledge that a child young person is or is likely to be at risk of harm. Refer to Finding 5.3.5 for more information.
 - What a safeguarding risk is and the processes to identify, manage and mitigate risks. Refer to Finding 5.3.1 for more information.
 - Record keeping. Refer to Finding 5.2.1.6 for more information.
 - Requirements for recruiting staff including screening, training, assessment of child-related positions, and conducting reference checks are outlined in policy, however procedures and templates to support this process do not exist. Refer to Finding 5.3.4.
- Inconsistent version controls have been applied to WAIS policies. Human Resources Policies and Guidelines (Version 2.5) includes version control on the front page listing the owner, approver, and next review date. Whereas other policies such as WAIS Travel Policy (2022) includes a review and revision section on the last page and states the policy will be reviewed as it is deemed appropriate.
- A policy register was not able to be evidenced.
- Policies and procedures are documented on the WAIS website. Staff, athletes and their families access policies and procedures. No evidence was provided which highlighted how athletes and their families are made aware of policy changes.
- Upon the adoption of the NIF, a series of information flyers have been developed for children and young people. Prior to 1 January 2024, WAIS did not have policies available in a variety of easy-to-read formats for children and young people.

Site visits

- It was observed during site visits that no materials regarding WAIS' athlete safeguarding, and complaint processes were on display at the time of the Review. This includes at the WAIS HPSC and public, third-party spaces.

Impact

Without clear policies and procedures, there is an inconsistent approach in the application of WAIS' athlete safeguarding objectives and requirements. For example, some athletes and families of athletes described instances where ineffective policy governance resulted in arbitrary decision making by WAIS leadership. One athlete and one family member described how the discretionary application of policies resulted in them experiencing significant distress and ongoing poor mental health.

Additionally, if policies and procedures are not available in easily accessible, age-appropriate formats, staff, athletes, and their families may not understand safeguarding objectives and requirements.

Recommendations

5.2.3.1 Conduct a reconciliation of the current suite of policies and procedures.

Conduct a reconciliation of the current suite of policies and procedures. Identify what policies and procedures are needed under the SEPPF and NIF.

Document how the policies and procedures contribute to the safeguarding efforts within the newly developed safeguarding framework at WAIS. Policies and procedures should demonstrate how they support achievement of the safeguarding strategy and outcomes and should clarify roles, responsibilities, and accountabilities. Refer to Recommendation 5.1.2.1 for more information.

5.2.3.2 Enhance safeguarding policies and procedures.

- Review the policy and procedure suite to ensure documents are fit-for-purpose, relevant and endorsed as well as aligned to the NIF policies.
- Consult with staff, athletes and families during development of policies and align to better practice safeguarding so far as reasonably possible. Policies need to provide practical guidance to staff and athletes in the organisation, which can be hard to get right if they are not involved. Consulting involves asking questions and sharing information and context to engage people in sharing their views and experiences to inform policy development. Some methods include surveys, workshops, group conversations, invitations for submissions or written input and emails. Refer to Recommendation 5.4.1.3 for more information.
- Ensure all relevant policies, including WAIS' commitment to athlete safeguarding, are provided in age-appropriate formats and other identified formats, such as easy-English and additional languages, relating to the WAIS demographic and are accessible to staff, athletes and the community. WAIS should consider who needs to access and understand a certain policy and ensure there are versions to suit the corresponding audience.
- Ensure training and communication exists for athletes and staff when new policies and procedures are released, or policies and procedures are updated. Refer to Recommendation 5.4.1.1 and 5.4.3.1 for more information.

5.2.3.3 Enhance policy and procedure version control.

- Develop a policy register which includes policy titles, descriptions, owner/author, version number, effective date, review date, status, endorsement date, related documents, and the review schedule.
- Establish standardised review times for all policy documents and adhere to them strictly to ensure that policies are current and relevant.
- Develop and implement an endorsement procedure that mandates approval from the appropriate level of management before policies are updated.
- Indicate the version number, approval date, revision date, and author(s) on all policy documents to distinguish new policies from previous versions.

5.3 Preventing and responding to complaints, concerns and incidents

Protecting athletes from harm is a crucial aspect of safeguarding and can be achieved through safeguarding risk management; by proactively identifying risks, organisations can identify potential safeguarding issues before any harm occurs. Responding to something that goes wrong is equally important. Having an effective incident management process ensures a prompt and active response to any adverse events. It is vital to have a robust system for handling complaints, one that is responsive to both current and historic issues and is supportive of the safety and wellbeing of athletes throughout. Ensuring people are held to account within the organisation, driven by safe recruitment and performance management, can reduce the barriers that individuals may face when raising concerns or complaints.

5.3.1 Enhance risk management strategies to prevent, identify and mitigate safeguarding risks to athletes.

Context

Risk management is a logical and systematic process that enables organisations to identify opportunities and reduce the likelihood or severity of accidents and incidents occurring. A risk is what could go wrong. This differs to incidents, if an incident occurs the risk has been realised. In the context of athlete safeguarding, risk management aims to protect athletes from abuse and harm while enhancing their overall wellbeing. Athlete safeguarding risks can come from the following sources:

- propensity risks such as the inclination to abuse athletes including children and young people
- situational risks such as the environment
- vulnerability risks such as the characteristics of athletes
- institutional risks such as the characteristics of the organisation.

The WAIS Risk Management Policy (2023) outlines WAIS' risk management objectives, the risk management governance structure and policy statement. The Risk Management Framework (2023) defines how risks associated with WAIS will be identified, analysed, and managed. It outlines how risk management activities will be performed, recorded, and monitored. The Framework highlights the need to identify athlete safeguarding and wellbeing risks. The impact rating table in the Framework considers impacts to WAIS staff and athlete's safety and wellbeing.

WAIS Strategic Risk Profile (2023) documents WAIS' 14 strategic risks categorised from extreme to low. WAIS Operational Risk Register (2023) documents WAIS' operational risks, their current corresponding controls, risk rating and owner.

Findings

Areas for improvement

Risk management practices must be strengthened to ensure they are operating as intended and embed athlete safeguarding. The following process deficiencies were noted.

- WAIS has not considered all internal and external contexts specific to their environment and embedded this into current risk management practices. For example, external factors such as risks associated with funding agreements and safeguarding laws are not considered and internal factors such as sport culture, pressure to perform, intense competition and vulnerability of athletes are not considered.
- WAIS have not identified and recorded all athlete safeguarding risks specific to their environment. Refer below for a review of risks that have not been identified. Currently, a risk description that focuses on the event, outcome and issues is not documented and WAIS do not consistently assign risk ownership to maintain, manage and monitor each risk.
- Inherent risk, that is the level of risk when no controls or treatments have been put in place to manage the risks, has not been assessed. Controls that are documented lack detail and often don't address the risk. For example, a Psycho-social risk is identified in WAIS' Operational Risk Register (2023), the controls listed are policy and procedure, recruitment best practice and staff training (iinduct).

- Risk evaluation, where WAIS balance their risk appetite (the level of risk that WAIS is willing to accept to achieve its objectives) against potential risks and risk treatments to make informed decisions does not occur. At the time of the Review, WAIS had not yet defined and documented their risk appetite and tolerances. There was no evidence that WAIS considered the most suitable form of treatment for their identified risk and therefore no risk treatment plans were evidenced.
- There is no evidence of risk monitoring and reporting occurring through governance structures. Whilst WAIS' Strategic Risk Profile (2023) states it was approved by the WAIS Board in 2022, there is no evidence that periodic reviews of the Risk Registers and the information included is occurring. Additionally, there is no evidence of internal audits or control testing occurs. See Finding 5.2.1.2 and 5.2.1.3 for more information about reporting through governance structures and assurance mechanisms.
- Communication involving sharing athlete safeguarding risk-related information with relevant stakeholders during the athlete safeguarding risk management process does not occur. Those who should be consulted and communicated with, such as the WAIS Board, CEO, Senior Leadership Team, program teams, are not defined. Without communication, awareness and understanding of athlete safeguarding risks, controls and treatments throughout WAIS is not promoted. This impacts the ability for WAIS stakeholders to make informed decisions and impacts the WAIS' ability to identify athlete safeguarding risks and keep athletes safe.

Whilst both the WAIS Strategic Risk Profile (2023) and WAIS Operational Risk Register (2023) identify some athlete safeguarding risks, they do not currently facilitate oversight of all athlete safeguarding risk areas. WAIS does not monitor all strategic, operational and project/program level athlete safeguarding risks. The following risks were observed.

- Risks in physical spaces. It was observed that doors were left open, there is public access to changes rooms in shared venues such as the HBF Stadium and site access is not monitored. Some athletes spoke about bringing family members into the HPSC and ex-staff having access. An altitude simulation room exists which features dorms, lounge, kitchen, office and bathrooms. Athletes stay overnight in this room and risks associated were not considered or identified.
- Risks associated with venues and facilities. WAIS does not conduct risk assessments of their venues and facilities. See information below regarding third party risk management.
- Athlete safeguarding risks associated with high-risk activities. For example, a risk that an athlete may suffer psychological harm or be subjected to excessive training in preparation for participation in high-risk activities.
- Risks to athletes who are inherently more vulnerable including athletes with disability, training agreement athletes, Individual Athlete Program (IAP) athletes and children and young people.
- Athlete safeguarding risks within the online environment and data security including risks to athlete through social media bullying or concerns, risks that WAIS ICT systems are hacked, and athlete data is exploited.
- Risks associated with international or interstate travel requiring overnight stays.
- Risk associated with child-to-child and adult-to-child interactions such as inappropriate relationships, bullying, grooming, inappropriate role modelling and exploiting positions of authority or power.

A systematic process is not in place to monitor and mitigate potential risks associated with the engagement of third-party contractors including staff and contracted facilities. Although some requirements of contracted support services staff are defined within WAIS policies, this approach has not been consistently applied nor evidenced across all third-party contractors. Refer to Finding 5.2.1.4 for more information regarding concerns raised with credentialing of third-party support services staff and Finding 5.2.1.5 for conflict of interest concerns relating to third-party support services.

Whilst WAIS may outsource services to third parties, the risk of harm to athletes including children and young people remains the responsibility of WAIS. For this reason, where WAIS identify that the work, services or activities of the contractor may present a safeguarding risk, steps must be taken to minimise and manage this risk.

Data collected

Survey

Most current and former coaches, support staff, administrative staff and management agreed that they could identify risks to athlete safeguarding. Interviews and focus groups were utilised to expand upon this subject and it was noted that the current approach is reactive. Coaches and support staff who recognised a potential risk to an athlete, stated they were prepared to step in and act. It was noted that there is an absence of formally established structures and processes that would systematically support and formalise their intentions.

- 24 out of 24 (100%) of current and former coaches and support staff surveyed agreed or strongly agreed that staff understood how to identify risks to an athlete's safety and wellbeing.
- 20 out of 24 (83%) of current and former coaches and support staff surveyed agreed or strongly agreed that there was a process to document risks to an athlete's safety and wellbeing.
- 21 out of 24 (87.5%) of current and former coaches and support staff surveyed agreed or strongly agreed staff understood what to do if they identify risks to an athlete's safety and wellbeing.
- 13 out of 15 (87%) of current and former administrative and management staff surveyed agreed or strongly agreed that risks were identified and reported.

Focus groups and interviews

Through interviews and focus groups it was noted that there was ambiguity and inconsistency in the level of understanding that coaches, support staff and management had about athlete safeguarding risk management practices.

Most coaches and support staff explained risk management involved responding to an issue as it arose, and proactive risk management did not occur as there are no risk identification and escalation processes. When asked how they identify and manage safeguarding risks, coaches and support staff could list mitigation strategies that were in place. For example, most coaches and support staff mentioned chaperones whilst traveling with young people under 18, policies regarding distorted eating and supervision ratios. Understanding of technical risk and risk management processes was limited. Most coaches and support staff interviewed, noted that risks identified were not documented. One staff member stated '[it] wasn't written anywhere' when asked how they documented risks and mitigation strategies.

Some athletes identified risks to their safety but agreed this wasn't documented anywhere formally. For example, one athlete identified risks to their psychological safety, stating that the physical environment caused fear and anxiety, but after raising it with management agreed it was not documented formally.

Most members of management and the WAIS Board noted that currently little risk management processes exist. Management advised they had recently engaged a consultant and were working on improving risk management.

Desktop review

- The WAIS' Risk Management Policy (2023) and WAIS' Risk Management Framework (Version 4.0) were endorsed by the WAIS Board in December 2023, however, have not yet been implemented and embedded within WAIS. There was no evidence that the risk framework has been applied in practice across the Review period. The following was observed:
 - Risk management governance structure is not yet operating as per the WAIS Risk Management Framework (2023). For example, there is no risk management committee operating at WAIS.
 - There is no evidence of communication and consultation with WAIS staff and athletes as it relates risk management.
 - Risk assessments, as per the WAIS Strategic Risk Profile (2023) and WAIS Operational Risk Register (2023) do not address all requirements of the WAIS Risk Management Framework (2023). For example, risk treatment plans are not documented, controls are not rated, owners are not identified. Additionally, the Profile and Register lack detail and comprehensive assessment of risks.
 - There is no evidence of risk reporting occurring aligned to WAIS Risk Management Framework (2023).
 - Several documents listed in WAIS Risk Management Framework (2023) were not yet developed. This includes the Risk Management Strategy, Risk Management Plan, Risk Appetite and Tolerance Statement and Risk Management Training Schedule.
- At the time of the Review, WAIS was in the process of developing their Risk Appetite and Tolerance Statements.
- WAIS Strategic Risk Profile (2023) documents WAIS' 14 strategic risks categorised from extreme to low. Examples of risks include 'WAG Participant Apology Process,' 'Inappropriate behaviour of individual staff/athlete' and 'Inappropriate behaviour towards child athletes by staff/athletes.' A strategic athlete safeguarding risk is not defined and documented. The risk profile does not assign risk owners, does not include inherent risks, lacks detailed controls and risk evaluation.
- WAIS Operational Risk Register (2023) documents WAIS' operational risks, their current corresponding controls, risk rating and owner. Examples of risks include 'working with minors,' 'unsupervised access to gym/ergo area/environment chamber by WAIS staff / athletes /externals,' 'risk of harm to staff or athletes while

travelling' and 'molestation.' Not all safeguarding risks specific to the WAIS environment are identified. The risk register does not include inherent risks, lacks detailed controls and risk evaluation.

- Review of documentation evidenced that there were no site-specific risk management plans or risk assessments in place to monitor and identify risks, and to implement mitigation strategies, at WAIS facilities in a formalised manner.
- Audit and Risk Committee Charter (2022) states the Audit and Risk Committee oversees the WAIS' system of risk management and internal controls. However, review of Charter meeting minutes and agendas reveal no evidence of athlete safeguarding risk monitoring and reporting occurring through governance structures.

Site visits

- It was observed during site visits that physical risks to athlete safeguarding were not identified, documented or managed. A site walkthrough of two sites managed by a third-party contractor and members of the WAIS Senior Leadership Team took place. During this walkthrough safeguarding risks were identified such as a risk that harm or abuse occurs to an athlete in unsupervised changerooms which allow public access.
- During the site walkthrough, members of the Senior Leadership Team stated that certain risks were not within the WAIS' responsibilities. These risks were neither actively identified nor captured in the existing risk management documentation. It was noted by members of the Senior Leadership Team that should these risks be formally recognised it could lead to the termination of the current operations.
- Members of the Senior Leadership Team said that risk mitigation in third party operated sites is the responsibility of the third party to manage. The Senior Leadership Team could not explain a processes for identifying, documenting, and communicating risks present in the physical environment to the WAIS Board.

Impact

Without a systematic approach to identify, document, monitor, and mitigate risks related to athlete safeguarding, measures for the proactive prevention of incidents, complaints, and abuse may not occur.

Recommendations

5.3.1.1 Embed organisational risk management and identify, manage and mitigate athlete safeguarding risks.

Aligned to the Risk Management Framework (2023), embed organisational risk management and identify, manage and mitigate athlete safeguarding risks.

- Implement the risk management processes as defined WAIS Risk Management Framework (2023). This includes defining the external and internal environment in which the WAIS operates, identify risks and categorise by strategic, operational and project level risks, analysis the risk using risk tables, define existing controls, determine residual risk rating, evaluate the risk and formulate risk treatment plans.
- Define WAIS Risk Appetite Statement as it relates to athlete safeguarding, this should set out the level of risk that the WAIS is willing to accept in pursuit of its strategic priorities. Define the WAIS Risk Tolerance Statement as it relates to athlete safeguarding. That is the level of risk that WAIS is willing to accept in deviating from its Risk Appetite Statement.
- Embed ongoing monitoring and periodic review of the risk management process and its outcomes as part of the risk management process, with responsibilities clearly defined.
- Record all risks in the approved risk registers. Report through governance structures.
- Ensure communication and consultation occurs with all relevant stakeholders (internal and external) at each stage of the risk management process.

5.3.2 Barriers to raising concerns and complaints should be addressed.

Context

Addressing barriers to raising concerns and complaints is crucial in creating an environment where athletes and staff feel safe and empowered to voice their issues. Barriers can exist for several reasons, such as:

- Fear of retribution or negative impacts, including harm or trauma, after raising a concern.
- Past experiences where concerns were either ignored or led to negative consequences for the complainant can create a culture of silence.
- If there is a belief that the system is inherently unfair or biased, individuals may feel that it is futile to make complaints because nothing will be done, or it might be swept under the rug.
- Social dynamics and the desire to fit in or not be seen as a troublemaker can deter individuals from raising issues.
- Some individuals may not know how or where to file a complaint, what the process involves, or whether there are resources to assist them in resolving their concern.
- Unclear communication channels may inhibit complaints or concerns from being raised effectively.
- Without assurances of confidentiality, people may be worried about being identified and possibly targeted after they report a concern.
- Organisations might fail to educate their members on the importance of feedback for continual improvement, leading to misconceptions about the purpose and value of complaints.

Findings

Areas for improvement

There are actual and perceived barriers that currently and historically have hindered athletes, coaches, and support staff from raising athlete safeguarding concerns and complaints. The following was noted.

- Both current and former athletes, families of athletes and staff who had raised athlete safeguarding concerns or complaints described repercussions and retribution they had experienced as a result of raising concerns or complaints. Examples provided included de-selection or exclusion from activities, termination of scholarship arrangements, withholding travel opportunities or funding to support travel, counter-allegations or threats of termination or legal action.
- Current athletes spoke about barriers to raising a complaint. Barriers included jeopardising their relationships with coaches, their selection for competition or their scholarship, exclusion from the program or team and concerns regarding conflict of interest, privacy and confidentiality.
- Current athletes described not wanting to raise concerns due to the impacts on program funding or the program more broadly. One athlete explained they if they raised a concern about their coach, the coach would be stood down and their program would be impacted. Additionally, many current athletes could not identify who to report a concern to if it was about their coach.
- Both current and former athletes said they would not raise complaints when it could jeopardize their own performance or opportunities. This was due to fear that raising complaints would negatively impact their mental health.
- It was observed that more seasoned athletes possessed greater confidence to voice their opinions, while a more pronounced hesitancy was noticeable among the younger or more junior athletes. It was noted that training agreement athletes may be reluctant to raise concerns at the risk it jeopardises their opportunity to secure a scholarship.
- During the course of this Review, participants advised that, some staff who raised concerns relating to athlete safeguarding felt they experienced retribution by way of disciplinary action for speaking up in group settings.

Data collected

Survey

Half of the athletes and their families surveyed agreed that they were worried that if they raised a complaint, they could jeopardise their place at WAIS or be punished. Through a series of interviews and focus groups, this topic was examined in greater detail where many athletes spoke about the actual and perceived barriers, they believed hindered them from raising complaints.

- The graph, below, illustrates the responses to the following survey question: I am worried that if I raised a complaint, I could jeopardise my place, or my family member's place, at WAIS or be punished.



Graph 7: Fear of retribution for voicing complaints at WAIS.

Coaches, support staff and administrative staff surveyed mostly agree that leaders at WAIS encourage them to raise complaints about athlete safeguarding. However, when explored further in focus groups and interviews some coaches, support staff and administrative staff provided examples of retribution from leaders after raising complaints.

- 19 out of 24 (79%) current and former coaches and support staff agreed or strongly agreed that leaders at WAIS encourage them to raise complaints about athlete safety and wellbeing.
- 5 out of 8 (62.5%) current and former administrative staff agreed or strongly agreed that leaders at WAIS encourage them to raise complaints about athlete safety and wellbeing.

Only half of coaches, support staff and administrative staff surveyed feel completely likely to raise complaints if they had a problem about athlete safety and wellbeing.

- 13 out of 24 (54%) current and former coaches and support staff stated they were likely to raise complaints if they had a problem about athlete safety and wellbeing.
- 10 out of 15 (67%) current and former administrative staff and management stated they were likely to raise complaints if they had a problem about athlete safety and wellbeing.

Interviews and focus groups

Some athletes interviewed spoke about barriers to raising a complaint. Barriers included jeopardising their relationships with coaches, their selection for competition or their scholarship, exclusion from the program or team and concerns regarding conflict of interest, privacy and confidentiality. Some athletes noted that confidence to raise complaints came from increased agency within their sport stemming from age/experience and success and not the mechanisms provided by WAIS. It was noted by athletes, staff and family members interviewed that training agreement athletes are perceived to be a highly vulnerable cohort as many are under the age of 18 and do not have access to support services. In addition, training agreement athletes may be reluctant to raise concerns at the risk it jeopardises their opportunity to secure a scholarship.

Some athletes have recommended improvements to the complaint handling process, emphasising the need for clearer information about contact points, confidentiality, and assurance that complainants will not face retribution.

Most family members that were interviewed feared retribution and were concerned about conflict of interest including the lack of independence when investigating matters.

Some coaches and support staff interviewed described how there are perceived and real barriers for athletes and staff when raising a complaint. Examples of barriers included retribution, athletes concerned about their scholarship tenure and funding, or program cuts associated with complaints. Some coaches and support staff raised concerns regarding conflict of interest, privacy and confidentiality particularly when raising a complaint.

Athletes, families, coaches, and support staff interviewed who previously raised complaints have spoken out about the consequences they experienced, which included retribution, negative effects on scholarships and sporting programs, and breaches of confidentiality. For more information see Finding 5.3.3. and 5.3.4.

Most current WAIS Board members recognised that a power imbalance between athletes and coaches, and coaches and Senior Leadership Team exist and therefore as a Board are targeting an organisational culture where people feel safe and empowered to raise concerns.

Desktop review

- Athlete Induction Template 2023-24 states 'you will be listened to and taken seriously' regarding complaint management.
- The following documents, which could reduce the barriers to raising complaints, do not exist at WAIS:
 - Policies or procedures which address barriers to raising complaints such as confidentiality through the complaint process and multiple avenues for raising complaints.
 - Policies, procedures, or guidance materials for training agreement athletes to educate them on their rights and how to raise complaints. Refer to Finding 5.2.2 and 5.4.1 for more information.
 - Child friendly complaint handling posters to educate children and young people on how to raise complaints and the process to handle complaints.
 - Data or trend analysis over incidents, complaints or concerns reported through governance structures to understand reporting culture.
 - Staff or athlete survey results indicating a reporting culture.
 - Anti-retaliation policies or anti-retaliation requirements within policies to protect those raising concerns or complaints.
 - Expectations in role profiles or performance review templates relating to raising incidents, concerns or complaints if harm occurs.

Impact

An organisation where actual or perceived barriers to raising complaints exist can lead to unreported complaints or incidents including unreported instances of harm or abuse, further harm to the individual and potential harm to other individuals. The organisation cannot learn from incidents and complaints and make improvements. This silence can inadvertently attract predators, capitalising on a culture that fails to address concerns, complaints, and incidents appropriately.

Recommendations

5.3.2.1 Improve reporting culture at WAIS.

- Create a safe and open environment where all employees feel safe to report concerns without fear of retribution or negative consequences. This can be achieved by implementing strong anti-retaliation policies and regularly communicating these policies to all employees.
- Empower staff and athletes with training that educates staff and athletes on what constitutes an incident, complaint and concern and how to report it, and why it's crucial for the safety and integrity of the organisation. Equipping staff with this knowledge can empower them to speak up. Refer to Finding 5.4.3 for more information.

- Aligned to Recommendation 5.3.3.1, develop and maintain clear, accessible reporting channels that are straightforward and user-friendly. These channels should assure confidentiality and be readily available to all athletes, staff and members of the community.
- Leadership should model the desired behaviour by taking all reports seriously, acting upon them promptly, and maintaining transparency about the follow-up process. Leaders must be held accountable for supporting the reporting culture. This responsibility should be embedded into position descriptions and performance reviews.
- Regularly solicit feedback from staff and athletes regarding the effectiveness of the reporting mechanisms and seek suggestions for improvement. Encourage a participatory approach where staff and athletes feel part of the solution.
- Offer resources, supports and information on external supports to such as counselling those who have been affected by incidents and complaints and to individuals who report them.
- Implement a system to recognise and reward staff and athletes who contribute positively to the reporting culture.

5.3.3 Complaint handling policies and processes must be documented, embedded, well understood and accessible to all.

Context

Appropriate handling of safeguarding concerns, complaints and incidents is integral to maintaining trust with the community WAIS serves and minimising the risk of harm to athletes, including children and young people. Organisations should have processes to respond to concerns, complaints and incidents that are person-centred and uphold the rights of athletes and staff. See Finding 5.3.5 for more information regarding safeguarding incidents.

The term complaint should be interpreted broadly. It can include expressions of dissatisfaction about an organisation related to one or more of the following:

- its services or dealings with individuals
- allegations about the conduct of its staff, contractors or other individuals engaged by the organisation
- another person at the organisation, or the handling of a prior concern.

A safeguarding complaint can include allegations of harm, abuse and exploitation, allegations about the conduct of staff or breaches of safeguarding policies.

Historically complaints regarding the behaviour of athletes and staff were handled accordance with the Athlete and Staff Code of Conduct and the Athlete Protection Policy (2023). The Athlete Protection Policy, which is no longer operating, outlined the athlete grievance process. A Grievance Form is attached to the Code of Conduct and the Athlete Protection Policy. The Grievance Form can be submitted to a designated grievance officer. These include the CEO, People and Community Manager, Integrity and Safeguarding Manager, Performance Team Directors and Corporate Services Managers.

From 1 January 2024, WAIS adopted the NIF and therefore Complaints, Dispute and Discipline policy (2024). Currently at WAIS, there are four different processes to handle complaints.

1. Sport Integrity Australia will handle complaints regarding child safeguarding and discrimination.
2. WAIS will handle breaches to any of the NIF policies leveraging the Complaints, Dispute and Discipline policy (2024).
3. WAIS will handle breaches of the Athlete Code of Conduct (2023) using the Athlete Code of Conduct (2023).
4. WAIS will handle breaches of the Staff Code of Conduct (2023) using the Staff Code of Conduct (2023).

Historically complaints were handled by the People and Community Manager. Any current complaints will be handled by the Integrity and Safeguarding Manager.

Findings

Areas for improvement

Complaint management policy

There is currently no complaints policy which outlines a structured approach to handling and resolving of complaints. The Complaints, Dispute and Discipline Policy (2024), Athlete Code of Conduct (2023) and Staff Code of Conduct (2023) does not document the process to handle a complaint, nor does it clearly define roles and responsibilities of staff and their required involvement in addressing specific complaint types.

There is no definition for what constitutes a safeguarding complaint, grievance or incident at WAIS which results in ambiguity and potential inconsistency amongst staff involved in addressing complaints related to athlete safeguarding. Refer to Finding 5.3.5 for more information regarding safeguarding incidents. It was observed during the Review that a lack of definition for safeguarding related complaints resulted in inconsistent understanding amongst staff and impacted management's ability to compile a complaint register, please see below limitations relating to record keeping.

Additionally, without a complaints policy which outlines a structured approach to handling and resolving of complaints, consistent decision making was not applied. WAIS takes a case-by-case approach to handling and resolving complaints, making decisions in the best interest of WAIS and not those affected. See process limitations below.

Complaint management process

There is no defined, embedded and communicated process to handle complaints. The following was noted in relation to the management and handling of safeguarding complaints.

- Receive the complaint. Numerous avenues, methods and mediums through which concerns, feedback and formal complaints can be raised, including mechanisms which support anonymity and that are free from conflicts of interest, are not available to athletes, families and staff. Avenues which are child friendly do not exist. Currently, WAIS refers athletes and staff to Grievances Officers, via a Grievance Form or to Sport Integrity Australia to raise complaints. The WAIS website does not provide information on how to raise a complaint. During the Review, WAIS developed an online form for historical complaints.
- Record the complaint. A system, database or register does not exist to record complaints in a centralised, consistent, or coordinated manner. WAIS lacked a formal register or complaint log, resulting in an absence of comprehensive insights into historical or current complaints throughout the organisation.

To identify complaints received and addressed during the Review Period, management embarked on an initiative to assemble a register relying on staff memory and recollection. This took three weeks from request to receipt. Due to the absence of a policy and a process for recording complaints, there is no definitive record or source of truth for all complaints raised within the Review period. Instances were cited where staff reported safeguarding complaints and complaints about staff behaviour, however, these issues were neither recorded, progressed nor formalised by management.

- Acknowledge the complainant. Complaints are acknowledged inconsistently as the process is not formalised. For example, staff spoke about emailing an acknowledgement to complainants, whereas those who had previously raised complaints said they were not acknowledged. Athletes and staff should be acknowledged at the time of receipt or as soon as possible. It was noted that athletes and staff are wary about making a complaint and want to be assured they are being listened to straight away. Refer to Finding 5.3.2 for more information regarding barriers to raising complaints.

A process to ensure athletes including children, families of athletes and staff reporting safeguarding complaints are treated with sensitivity and provided with support from the outset was not in place. Athletes, parents and staff who had raised complaints historically and during the Review Period described a lack of support services, such as Employee Assistance Program (EAP) or equivalent pastoral support services. One parent stated that there was 'no EAP or support [when concerns were raised].'

- Triage and escalate when required. Complaints are not triaged when received. Complaints are not categorised based on risk, urgency, severity, impact and type of complaint. Under the NIF Complaints, Dispute and Discipline policy (2024), Athlete Code of Conduct (2023) and Staff Code of Conduct (2023), policy breaches are categorised by category levels. The category levels do not support documentation of low level or small complaints, the prioritisation of complaints, resource allocation to complaint handling, athlete and staff satisfaction as high priority issues are not dealt with in a timely matter, risk management as some complaints may indicate serious systemic issues or risks within the organisation and analysis to understand common complaint types and potential areas for improvement (see details below). It was noted that some staff members responded to complaints based on their 'common sense.'

Additionally, there is no documented process to internally escalate complaints to the WAIS Board and CEO when required. Refer to Finding 5.2.1.2 for more information on reporting through governance structures. There is no process to externally escalate, to relevant authorities and stakeholders, when required. For example, there is a lack of process to trigger reporting to external authorities for mandatory reporters.

- Assess and investigate. WAIS lacks a systematic and documented procedure for assessing and investigating complaints. As complaints are not triaged a consistent approach to the investigation depending on risk, urgency, severity, impact and type of complaint is not conducted. There is no documented approach to investigate internally, engage external parties to conduct investigations and which complaints require external investigation.

There is an absence of a clearly delineated methods to pinpoint and govern conflicts of interest throughout the investigatory stages. Such inconsistencies may undermine the integrity of the investigative outcomes and the trust of stakeholders. It is essential that WAIS establish a comprehensive and transparent approach to ensure the fairness and credibility of all investigations, especially in providing equitable resolutions and maintaining the organisational standards. It was noted by staff that there was no known process for investigating athlete safeguarding or integrity related complaints against the CEO as the CEO was historically accountable for the management and response of all complaints.

- Provide communication and ongoing support. There is an inconsistent approach to communication throughout the lifecycle of a complaint. Individuals who had previously filed complaints reported that they experienced a lack of frequent communication and felt they were left uninformed about the status of their issues. Regular

communication prevents frustration and demonstrates transparency, maintaining trust between the complainant and WAIS. Those who had raised complaints at WAIS felt dissatisfied with WAIS' response, see Finding 5.3.4 for more information. Additionally, what information can be shared with whom and when, and how it should be communicated to protect the safety and wellbeing of the complainant in accordance with privacy and confidentiality obligations is not documented with WAIS policies.

Additionally, it was noted that complainants, those raising complaints and those handling complaints do not receive adequate ongoing support or support people. A trauma-informed approach, that is being sensitive to the individual's needs, preferences, safety, and vulnerabilities, and recognising that their lived experience may make them susceptible to certain triggers that may lead to re-traumatisation and re-victimisation is not considered. Staff described the impact of a lack of support through the complaints process, which led to various negative outcomes including distress, and in some cases, necessitated taking stress leave.

- **Maintaining confidentiality.** There is no guidance to support communicating and handling sensitive and confidential information. Confidentiality is essential to a fair and effective complaints process. Those who have raised complaints with WAIS described concerns about confidentiality and privacy, stating these concerns are barriers to raising complaints, see Finding 5.3.2.

WAIS has not defined requirements to keep the complaints process confidential, noting requirements to disclose information if required by law or in what circumstances it is appropriate for the information to be shared.

- **Determine outcome and communicate.** There is no process to determine the outcome of a complaint and to communicate the outcomes with relevant stakeholders, including the complainant, respondent and staff involved in handling the complaint, where appropriate. While each complaint is different, WAIS must make decisions and deliver outcomes that are consistent. Potential outcomes should be documented.

WAIS must provide reasons for how they reached decisions in relation to the investigation or resolution of a complaint. Individuals are more likely to be satisfied with the outcome of a complaint, and have confidence in WAIS' complaint-handling system, if they understand why particular decisions were made or actions taken. Refer to Finding 5.3.4 for more information.

There are not options or avenues for complainants or respondents to appeal decisions or raise concerns about the integrity, veracity or independence of complaint handling and decisions. Stakeholders who raised complaints at WAIS spoke about having no opportunity to appeal decisions, no avenues to report concerns with the process or in times lack of procedural fairness.

- **Close the complaint.** As a system to record complaints does not exist, WAIS does not keep comprehensive records about how the complaint was managed, the outcome and any recommendations and/or outstanding actions and how they have been addressed. WAIS does not record of any systemic issues identified. Invite people to provide feedback at the conclusion of the complaints process.
- **Record keeping.** There is currently no central repository system to triage, escalate and review complaints or incidents, there is no systematic approach to oversee how different types of complaints and incidents are handled and recorded over their lifecycle. The following details are therefore not recorded:
 - details about the complainant
 - any additional communication or support required
 - details about the subject of the complaint
 - the complaint issues
 - how the complaint was resolved/investigated
 - how risks were managed
 - the complaint outcome.

It was noted that each respective grievance officer would manage their own files within the WAIS ICT environment. For example, through consultation it was noted that performance team directors would handle lower-level complaints independently and store information on their own files.

- **Monitoring, analysis, and improvement.** WAIS do not capture, monitor and analyse their complaints data to identify trends, patterns which includes patterns of grooming and systemic issues to address or to drive continuous improvement. Therefore, WAIS do not report on complaint trends, pattern and systematic issues through governance structures. See Finding 5.2.1.2 for more information regarding monitoring, reporting and the use of data.

Awareness and understanding of complaints system.

Athletes are not aware of how to raise complaints. Whilst most current athletes said they could talk to a person they trust, very little athletes understood the complaint process and who to raise formal complaints with. See Finding 5.3.2 for information on attitudes and behaviours towards raising complaints and concerns.

Some support staff were unaware of their reporting obligations for the specific incidents or complaints that require notification to authorities. Refer to Finding 5.3.5 for more information regarding responding to incidents and identifying signs of abuse.

Accessibility of the complaints system.

Complaint information is currently not accessible to all. Complaint information is not provided accessible formats such as other languages, child friendly version or versions suitable for people with disability. As noted above, numerous avenues, methods and mediums through which concerns, feedback and formal complaints can be raised are not available to athletes, families and staff. There are limitations in the mechanisms to reduce or remove barriers faced by athletes including children and young people in participating in the complaints process, such as proactive surveying of insights and experiences. See Finding 5.3.2 for more information regarding barriers to raising complaints.

A person-centred complaints system affords equal opportunities to all and removes barriers to access.

Handling of historical complaints.

WAIS' inadequate policies and inconsistent procedures were found to extend beyond the Review period, compromising WAIS capacity to effectively address historical safeguarding complaints and allegations of abuse. This shortfall hindered WAIS' ability to manage such sensitive issues consistently and safely, elevating the risk of re-traumatisation among those affected. Examples were provided where management discussed historical complaints, often downplaying, or dismissing them in the presence of others.

Data collected

Survey

Awareness and understanding of how to raise complaints about athlete safeguarding at WAIS varied among groups. This topic was explored in interviews and focus groups where majority of athletes were not aware of how to raise complaints about safeguarding at WAIS. WAIS staff were mostly aware of how to raise complaints about safeguarding stating they would go to a grievance officer.

- 41 out of 64 (64%) athletes surveyed noted that they somewhat or did not know how to raise complaints about safety and wellbeing at WAIS.
- 42 out of 64 (66%) athletes surveyed were somewhat or did not agree that WAIS told them how to raise a complaint.
- 8 out of 13 (62%) family members of athletes surveyed that stated they were aware of how to raise complaints about safety and wellbeing at WAIS.
- 18 out of 24 (75%) coaches and support surveyed stated they were aware of how to raise complaints about safety and wellbeing at WAIS.
- 15 out of 24 (62.5%) coaches and support staff agreed that WAIS told them how to raise a complaint if an athlete was unsafe.
- 6 out of 8 (75%) administrative staff surveyed agreed that they know how to raise complaint about athlete safety and wellbeing.
- 7 out of 8 (87.5%) administrative staff surveyed agreed or strongly agreed that WAIS told them how to raise a complaint if an athlete was unsafe.
- 7 out of 7 (100%) management staff surveyed agreed or strongly agreed that they knew how to raise complaints about athlete safety and wellbeing.

Half of athletes and their families agreed that there are multiple channels to raise a complaint. However, when explored more deeply in interviews and focus groups, it was noted that most athletes and their families didn't understand who to formally raise complaints with, stating they would talk to a coach or family member if they wanted to raise concerns.

- 35 out of 64 (55%) athletes surveyed agreed or strongly agreed that there are multiple channels to raise a complaint.

- 7 out of 13 (54%) family members of athletes surveyed agreed or strongly agreed that there are multiple channels to raise a complaint.

Whilst management and leadership surveyed agreed they knew how to escalate and report complaints, when it was explored further through interviews, focus groups and the document review, it was noted that there was a lack of process to do so and understanding of when and how to escalate and report complaints.

- 7 out of 7 (100%) management staff surveyed agreed or strongly agreed that they knew how to escalate complaints about athlete safety and wellbeing.
- 7 out of 7 (100%) management staff surveyed agreed or strongly agreed that they knew who is responsible for handling complaints regarding athlete safety and wellbeing.
- 6 out of 7 (86%) management staff surveyed agreed or strongly agreed that they believe leaders at WAIS prioritise handling complaints related to athlete safety and wellbeing over success in performance results.
- 3 out of 3 (100%) WAIS Board members surveyed agreed or strongly agreed that WAIS have robust complaint handling processes.

Focus groups and interviews

Most athletes, families, coaches and support staff agreed that multiple avenues to raise complaints did not exist. Most athletes said they would talk to someone they trusted, most often their coach, if they wanted to raise a concern. However, most athletes interviewed did not know of a formal complaint process including how they would raise a formal complaint and what to expect throughout the complaint process.

Athletes, family members and staff consulted with, who had raised athlete safeguarding complaints or concerns historically, did not have confidence in the complaint handling process at WAIS. Athletes, family members and staff described circumstances where complaints made about the conduct and behaviours of staff were not taken seriously, not formalised or handled inconsistently. Some who had expressed concerns found it necessary to seek assistance from DLGSC, following a period where WAIS had not addressed their issues.

Most WAIS staff had a desire to take correct and responsible actions, especially when it involved athletes. However, they faced uncertainty about the appropriate steps to take. It was noted that there is a lack of established procedures and therefore staff dealt with complaints on a case-by-case basis, choosing to prioritise WAIS' needs and not always taking a person-centred approach.

Most coaches, support staff and management reported the presence of inconsistent complaint and incident processes, with notable deficiencies in systems, data repositories, and documentation practices. The absence of robust record-keeping led to considerable variability in how cases were handled. Management indicated a propensity to address certain matters informally, stating they choose to deal with issues, deemed as 'smaller', by having private conversations rather than officially documenting the complaint, concern or incident. See Finding 5.3.4 for more information regarding holding people to account.

Most coaches and support staff said they knew who to raise concerns to and could name the grievance officers. However, some coaches and support staff said they were not confident in WAIS' ability to handle complaints. Those who had experiences of raising complaints shared complaints were handled without consistency, transparency or process. One staff member stated they 'felt very much like [the complaint] was swept under the rug' and did not have a lot of confidence that a genuine concern would be listened to or addressed.

Some coaches and support staff stated that confidentiality was not upheld. One staff member noted that historically the CEO reviewed all complaints. Another stated that if you made a complaint, you wouldn't know who had access to it, but confidentiality was not prioritised.

Some members of Senior Leadership Team stated they were unsure who was responsible for managing athlete complaints. Others stated that they were in the process of determining when to report and/or escalate matters to external parties, for example police and NSOs.

Desktop review

- Three policies currently document an inconsistent approach to handling and resolving of complaints. This includes the Athlete Code of Conduct (2023), Staff Code of Conduct (2023) and Complaints, Disputes and Discipline Policy (2024). As a result, WAIS has applied concurrent processes which results in no systemic consistent approach to complaint handling. Additionally, each policy does not document the process to handle a complaint, nor does it clearly define roles and responsibilities of staff and their required involvement in addressing specific complaint types. There is no definition for what constitutes a safeguarding complaint, grievance or incident at WAIS.
- A register, log or systems to document all complaints including low level complaints does not exist.
- Record keeping requirements are not documented in policy and procedure.

- Review of athlete safeguarding policies evidenced that policies relating to complaints are not available in accessible, age-appropriate, and meaningful formats to children and young people.
- The Scholarship Induction Booklet states athletes are directed to report concerns to WAIS, however there is no information within this material, on who athletes can direct queries or concerns to. Additionally, athletes are not provided with information about the complaint process, how complaints are managed and the process to dispute outcomes.

Site Visits

- It was observed during site visits that WAIS facilities or facilities utilised by WAIS athletes did not publicise complaint information including how to raise a concern or make a report, and to whom.

Complaint analysis

In line with the Review Terms of Reference and Review Methodology, detailed analysis of complaint handling processes via sample testing of a selection of past athlete safeguarding complaints was to be performed.

During the Review, an attempt was made to select a sample of complaints for review. However, it became evident that the lack of a comprehensive register posed a significant challenge, as the staff were unable to produce the necessary records or evidence to substantiate any complaint. This included documentation for both historical and any currently active complaints or concerns. The absence of these records indicates a gap in the complaint management system and underscores the urgent need for a systematic approach to document retention and accessibility.

Therefore, sample testing could not be performed, see Section 1.3 for more information. For this reason, analysis of the complaint handling processes was informed by written and verbal accounts from WAIS staff. WAIS supplied a document outlining the historical process for handling complaints, and an interview was conducted to understand current complaint handling processes.

Historical state

The historical process was documented in the WAIS Staff and Athlete Code of Conduct and the WAIS Athlete Protection Policy.

- Receive the complaint. It was noted that if an athlete or staff member wanted to raise a grievance issue with WAIS, they could discuss the matter with one of the WAIS designated grievance officers. If an athlete or staff member wanted to raise a formal grievance, they would be asked to complete the Grievance Form. There were not additional avenues to raise complaints or concerns.
- Record the complaint. It was noted that depending on the nature of the grievance and the breach, the level of complaint records varies. No evidence was provided demonstrating how complaints were recorded.
- Acknowledge the complainant. It was noted most complaints were raised verbally and these were acknowledged on the spot and normally followed-up in writing via email or verbally. No evidence was provided.
- Triage and escalate when required. It was noted that complaints would be dealt with and triaged in line with the relevant policy. Once a grievance officer became aware of the potential complaint, they would consider the potential policy breach and follow the processes outlined within the relevant policy. Categories were only documented in the Athlete and Staff Code of Conduct and not the Athlete Protection Policy. No process to escalate complaints was defined.
- Assess and investigate. Where an Athlete Code of Conduct breach had occurred, a panel was required to convene to investigate. No information was provided for staff breaches under the staff Code of Conduct. No evidence was provided to demonstrate investigations occurred.
- Provide communication and ongoing support. No evidence or information was provided to demonstrate communication and ongoing support was provided to the complainant and those involved.
- Maintaining confidentiality. It was noted that file structure within the WAIS ICT environment is designed based on a permission-based access hierarchy, which determines staff access to documents. However, interviews and focus groups spoke to inconsistent data governance, refer to Finding 5.2.1.6, and a lack of confidentiality and privacy beyond system access.
- Determine outcome and communicate. No evidence or information was provided to demonstrate how outcomes were determined and communicated.
- Close the complaint. No evidence or information was provided to demonstrate how complaints were closed.

- Record keeping. It was noted the complaints were not recorded in a central system however were captured within the WAIS ICT environment. No evidence of complaint records were provided.
- Monitoring, analysis, and improvement. It was noted no trend analysis or data analytics capture complaints or policy breaches.

Current state

The current process for managing complaints involves both Sport Integrity Australia and WAIS. Sport Integrity Australia handle complaints regarding child safeguarding and discrimination. WAIS handles breaches to any of the NIF policies, breaches of the Athlete Code of Conduct (2023) and breaches of the Staff Code of Conduct (2023).

When a complaint is raised to the attention of WAIS, it is directed to Integrity and Safeguarding Manager. From discussions with current WAIS staff, the following was noted but not observed due to limitations with available complaints documentation. Refer to Finding 5.3.3 for more information regarding recording the complaint and record keeping practices.

- Receive the complaint. All current complaints are referred to the Integrity and Safeguarding Manager. It was noted that a phone number is currently being established and a complaint email has been implemented. Additionally, a complaints poster has been developed.
- Record the complaint. It was noted no centralised system exists to record complaints. The Integrity and Safeguarding Manager stated WAIS has poor record keeping processes but was in the process of improving them.
- Acknowledge the complainant. It was noted that current complaints are always in writing and there will always be a record of the acknowledgement. For example, via email.
- Triage and escalate when required. It was noted all child safeguarding and discrimination complaints are dealt with by Sport Integrity Australia. When asked how complaints were triaged, the breach levels in the Staff and Athlete Code of Conduct were noted. Complaints are not categories or triaged based on risk, urgency, severity, impact and type of complaint. It was noted the CEO has access to all complaint records on the WAIS ICT system, with exception of complaints raised in relation to the CEO.
- Assess and investigate. It was noted a process to assess and investigate complaints does not exist.
- Provide communication and ongoing support. No evidence or information was provided to demonstrate how WAIS communicates and provides ongoing support for those involved in complaints.
- Maintaining confidentiality. Management advised that the integrity folder on the SharePoint is only accessible to the Integrity and Safeguarding Manager and the CEO. No evidence was provided.
- Determine outcome and communicate. No evidence or information was provided to demonstrate how outcomes were determined and communicated.
- Close the complaint. No evidence or information was provided to demonstrate how complaints were closed.
- Record keeping. Records are stored in the integrity folder on the SharePoint. No evidence of complaint records were provided.
- Monitoring, analysis, and improvement. It was noted no trend analysis or data analytics occurs to inform continuous improvement processes.

Impact

An ineffective complaint process leads to several highly adverse outcomes. Without a defined process there is inconsistency and a lack of transparency, which inevitably erodes trust and credibility among athletes, staff, and the broader community.

The failure to properly maintain records poses a significant risk. This is particularly true when it comes to legal mandates that require the documentation of child abuse allegations as well as the responses to such allegations. Without these critical records, it becomes extraordinarily difficult to identify abuse patterns. This not only hampers legal accountability but also severely undermines the pursuit of justice for victims and survivors and may even compromise legal investigations. Additionally, without maintained records WAIS cannot respond appropriately to historical complaints causing further harm and re-traumatisation.

The mishandling of complaints can have a direct and damaging impact on individuals involved. Both complainants and respondents are at risk of experiencing distress, which can aggravate harm and lead to further trauma.

These deficiencies can deter individuals from reporting incidents in the first place. When potential complainants lack confidence in the process, they may choose to remain silent, making it less likely that abuse is identified and addressed in a timely and appropriate manner.

Recommendations

5.3.3.1 Strengthen complaint management policy, process, and procedure.

- Ensure there are multiple avenues for complainants to raise complaints or concerns this should include anonymous avenues. Key stakeholders such as WAIS athletes, families of athletes and staff should be consulted to ensure that avenues identified meet the needs of the WAIS community.
- Define safeguarding complaint categories, classifications, and types to support reporting and monitoring of safeguarding trends, patterns and systemic issues. The definition of safeguarding complaints should be based on a clear understanding of relevant legal and regulatory requirements.
- Introduce a centralised, whole-of-organisation model for assessment, triage, escalation and review of complaints to ensure a consistent and standardised approach to the handling of complaints. Complaint management systems should be integrated with incident management systems (see Recommendation 5.3.5.1).
- Ensure support is embedded into the centralised model. Offer support throughout the process for all parties involved. This includes making support people available and referring to external support services when required. It is recommended that a trauma-informed approach be adopted and implemented throughout the entire organisation. This should involve the provision of comprehensive and ongoing support for complainants, individuals named in complaints, and staff responsible for complaint management. Such support should be tailored to the specific needs, preferences, safety concerns, and vulnerabilities of the individuals involved, with a keen awareness of the potential triggers that may lead to re-traumatisation or re-victimisation.
- Review, update or develop policies, procedures and templates at the organisational level to support processes and protocols for safeguarding complaints. Define specific roles of various WAIS staff throughout the entire lifecycle of a complaint. To support the effective management of safeguarding complaints, WAIS should establish clear protocols and procedures for their handling, including mechanisms for escalation and reporting as required. This should include guidance on the collection and management of relevant data and documentation, to ensure that all complaints are properly recorded.
- Embed oversight and assurance mechanisms to ensure ongoing and active review of complaints and incidents (including Mandatory Reports) handled by WAIS. This may include the introduction of a system or repository which supports centralised capture of critical information.
- Further develop and implement ongoing training and education programs to articulate the importance of recording and handling of complaints and incidents with staff.
- Develop awareness raising initiatives to ensure athletes and families of athletes are aware of the various avenues to raise complaints and/or concerns.

5.3.3.2 Establish a child-friendly and age-appropriate complaint process.

- Ensure the updated policies, procedures and templates, as per Recommendation 5.2.3.2, are provided in child friendly formats. Simplify language used within the complaints process to ensure that it is easily understood by children of all ages. Present the process through various child-friendly formats, such as visual diagrams, animations, and easy-to-read guides.
- Implement a system that allows for adult guidance, such as assigning trusted adults or mentors, who can assist young athletes in navigating the process.
- Provide comprehensive training for staff on how to handle complaints from young athletes in a manner that is respectful and supportive.
- Establish strict privacy protocols to protect the identities and details of the young athletes involved in a complaint.

5.3.4 Apply consistent approaches to holding athletes and staff accountable for unsafe behaviours or conduct inconsistent with WAIS policy and expectations.

Context

An organisation that embeds athlete safeguarding must recruit safe people, set clear expectations, embed performance management, and hold people to account when behaviours or conduct is inconsistent with the set expectations.

At WAIS recruitment is guided by the Human Resources Policies & Guidelines. The document addresses requirements surrounding interviews, reference checks and Working with Children Checks.

Expectations of staff and athletes are set through the Staff Code of Conduct (2023) and Athlete Code of Conduct (2023). Staff Code of Conduct (2023) states that staff should be familiar with the substance and spirit of the Code and should be aware that breaches may result in sanctions which may include counselling, disciplinary action, performance review, or civil or criminal action, depending on the nature of the breach. Athlete Code of Conduct (2022) states the Code demands high standards of WAIS athletes, provides sanctions for unacceptable behaviours and attitudes and provides a means where concerns about the conduct of athletes can be addressed.

Additionally, athlete safeguarding exceptions are documented in the NIF Safeguarding Children and Young People policy (2024) and NIF Participation Protection policy (2024). At the time of this Review, the NIF policies had not been implemented and embedded into practice.

For staff, the Performance Excellence Framework (2018) documents the framework for performance and development management of staff within WAIS. The Framework documents five Key Result Areas (KRAs) which include athlete performance, staff, stakeholders, finance, and infrastructure.

For athletes, the Athlete Performance Management Policy (2022) outlines how PET work with athletes to achieve goals, expected standards to be met and the roles and responsibilities of athletes and the requirements for Individual Athlete Performance Plan (IAPP). WAIS requires scholarship athletes to have IAPPs. IAPP is the instrument used to establish performance expectations, guide planning, and support the evaluation of each athlete. The IAPP includes a long-term plan, annual plan and training plans, assesses competition performance, potential to progress and athlete conduct, and documents dual career confirmation and lessons learned.

Findings

Areas for improvement

Recruitment and screening

Whilst recruitment and screening processes exist at WAIS which are documented in the Human Resources Policies & Guidelines, opportunities exist to ensure all practices are safeguarding-focused which embed WAIS' commitment to safeguarding athletes. The following examples were noted.

- WAIS' commitment to safeguarding is not advertised in the job advertising process. Ensuring that advertisements include WAIS' commitment to safeguarding athletes and informs the applicants that a zero-tolerance approach to abuse is tolerated, should discourage unsuitable candidates from applying for positions.
- The need for Working with Children Checks and National Criminal History Check, and/or International Criminal History Check is documented in Human Resources Policies & Guidelines. However, anecdotal examples were provided in interviews and focus groups of historic circumstances where screening was not performed.
- The Reference Check Template does not include any athlete-centric questions or any athlete safeguarding specific questions.
- The Selection Shortlist Matrix does not consider application of safeguarding practices and values.
- Position descriptions do not include clear expectations and responsibilities in relation to athlete safeguarding. Refer to Finding 5.2.2 for more information.
- No evidence was presented to confirm that qualification and registration checks have been carried out to verify their currency. During interviews and focus groups a current staff member raised concerns that qualification and registration checks could be invalid. Review of the staff compliance register noted examples of expired checks. For example, at the time the register was provided by WAIS in 2024, one staff members' dietician registration expired in December 2023 and one staff members' AHPRA registration expired in November 2023.

Setting expectations and holding people to account

There are inconsistent approaches to holding athletes and staff to account for unsafe behaviours or conduct inconsistent with WAIS policy and expectations. The following was noted.

- Whilst the Staff Code of Conduct (2023) outlines behavioural expectations for staff and the process by which WAIS will investigate a breach of the Code of Conduct, there were no formalised mechanisms, such as registers, logs and records outlining the responses to breaches of the code of conduct and relevant athlete safeguarding policies. WAIS does not capture, monitor, or report on staff breaches of WAIS' policies and code of conduct.
- Conversely, the Athlete Code of Conduct (2023) outlines behavioural expectations for athletes and the process by which WAIS will investigate a breach of the Athlete Code of Conduct and breaches were documented within a register and escalated to the WAIS Board.

Many current and former athletes, families of athletes and staff including coaches, interviewed, expressed dissatisfaction with the outcomes associated with policy breaches, complaints, concerns, and incidents. Participants noted that the mechanisms for holding individuals accountable for unsafe behaviours or conduct inconsistent with WAIS policy and expectations varied between stakeholders and was not consistently applied. Athletes, families, and staff spoke about examples of conduct being overlooked, policies being sidestepped, rewarding individuals who have underperformed or behaved inappropriately, and staff not being stood down when appropriate. For example, an athlete shared that a staff member who had faced complaints about their conduct subsequently departed from WAIS and now holds a position at a comparable organisation.

Performance management

Performance management is focused on medals, performance outcomes and winning and does not consider athlete safeguarding, wellbeing or experience. The following examples were noted.

- Staff performance management does not include athlete safeguarding, wellbeing or experiences and performances reviews are based on performance outcomes such as winning medals, competitions, or world records. It was noted through interviews and focus groups, that unless the wellbeing and safety of athletes are integrated into performance measure, the importance of athlete safeguarding will not be universally acknowledged and embedded. Refer to Finding 5.1.2 for more information.
- Athlete performance management is based on performance goals, competition performance, performance factor expectations and results, attitudes towards training and potential to progress in their sport. The wellbeing and safety of the athlete is not considered.

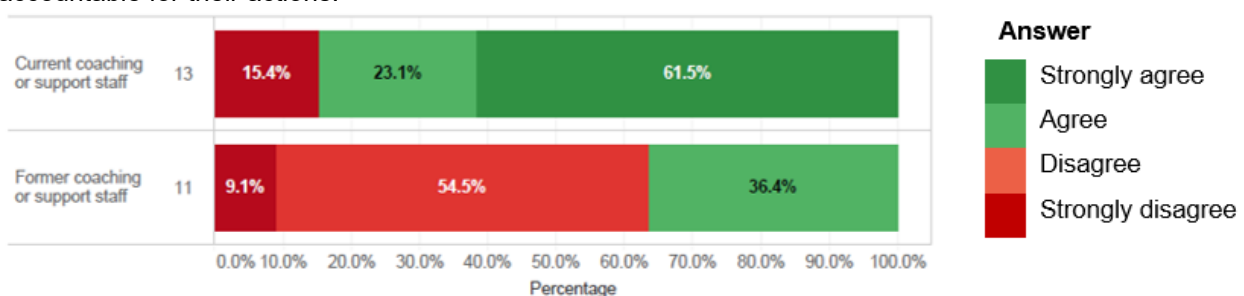
Data collected

Survey

Setting expectations and holding people to account

Whilst some athletes, families and staff agreed that people at WAIS are held accountable for their actions, when exploring this topic in interviews and focus groups, it was noted that those who had raised concerns or complaints in the past strongly disagreed.

- 38 out of 64 (59%) athletes surveyed agreed or strongly agreed that they believe people at WAIS are held accountable for their actions.
- 10 out of 13 (77%) family members of athletes surveyed agreed or strongly agreed that they believe people at WAIS are held accountable for their actions.
- The graph, below, illustrates the responses to the following survey question: I believe people at WAIS are held accountable for their actions.



Graph 8: Athlete perceptions of accountability at WAIS.

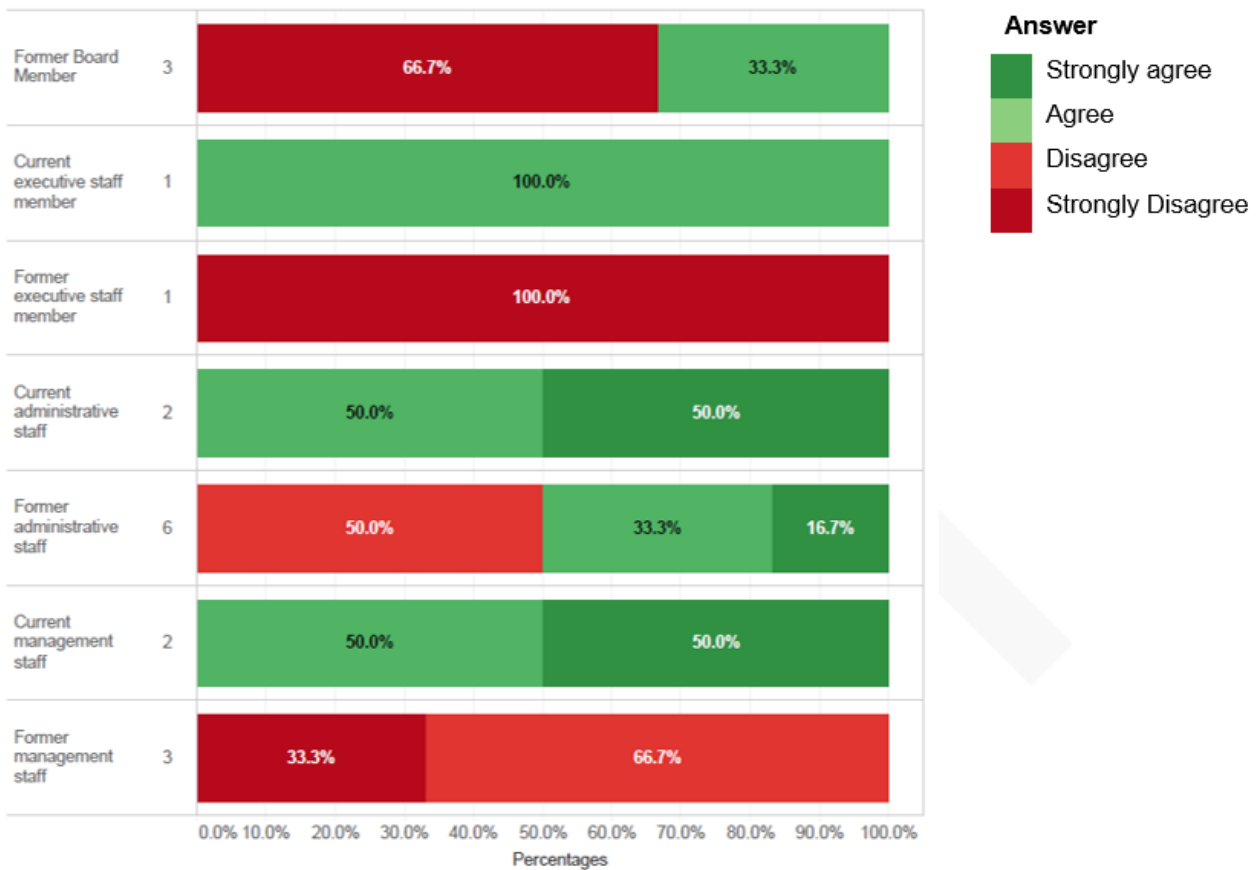
- 2 out of 8 (25%) administrative staff surveyed agreed or strongly agreed that they believe people at WAIS are held accountable for their actions.
- 9 out of 10 (90%) management and the Board surveyed agreed or strongly agreed that they believe people at WAIS are held accountable for their actions.

Majority of those who had previously raised a complaint disagreed or strongly disagreed that they felt WAIS responded appropriately.

- 12 out of 20 (60%) athletes surveyed who had previously raised a complaint disagreed or strongly disagreed that they felt WAIS responded appropriately.
- 2 out of 2 (100%) family members of athletes surveyed who had previously raised a complaint strongly disagreed that they felt WAIS responded appropriately.

Approximately half of the staff members and the WAIS Board surveyed agreed that they felt inappropriate behaviour is sanctioned at WAIS¹³.

- 13 out of 24 (54%) coaches and support staff surveyed agreed or strongly agreed that they believe inappropriate behaviour is sanctioned at WAIS.
- The graph, below, illustrates the responses to the following survey question: Inappropriate behaviour is sanctioned at WAIS.



Graph 9: Percentage breakdown across survey respondent groups indicating perceptions that inappropriate behaviour is sanctioned at WAIS.

¹³ Whilst it is recognised that the term “sanctioned” can hold two meanings, first to give official permission or approval, and second to impose a sanction or penalty, it is assumed that the interpretation applied by survey respondents was aligned to whether actions would be taken to address inappropriate behaviours given the nature of the question.

Interviews and focus groups

Recruitment

Management agreed that WAIS considers if coaches are suitable to work with children in the recruitment process, considering WWCC and police checks and asking questions about the candidate's willingness and suitability to work with children.

Some coaches and support staff stated that a credentialing system which asks for staff's up to date qualifications, accreditations or memberships does not exist at WAIS. Some coaches and support staff shared concerns that some qualification and registration checks could be invalid.

Setting expectations and holding people to account

Athletes consulted with who had raised concerns or complaints at WAIS, felt dissatisfied with the response of WAIS and lack of resolution or outcome. These athletes reported that complaints regarding the performance or behaviour of WAIS staff had been raised with management, but actions had not been appropriately taken. For example, athletes spoke about no action being taken at all or when action was taken it was in the interests of WAIS and not the athlete. Additionally, athletes shared they faced retribution for raising complaints instead of actions being taken to hold staff to account. Some athletes stated that WAIS engaged in a 'box ticking exercise' when addressing concerns.

Most family members interviewed stated there was a lack of accountability and oversight to ensure that concerns and complaints were escalated, addressed and resolved.

Most coaches and support staff who had not raised a concern or complaint, felt appropriate action would be taken as policies and procedures existed. However, some coaches and support staff said they were not confident in WAIS' ability to handle complaints.

Most coaches and support staff who had raised concerns at WAIS stated that confidentiality was not upheld and provided mixed responses on whether staff who had breached policies or demonstrated unsafe behaviours were held accountable for their actions. Coaches and support staff shared that decisions were prioritised to align with the organisation's best interests, notably emphasising the forthcoming competition or sports event and the pursuit of medals. More specifically, some staff spoke to historical and recent examples of coaching staff and administrative staff exhibiting unsafe, inappropriate, or harmful behaviours and conduct which was reported to members of the WAIS Senior Leadership Team and for which no action was taken or communicated to the reporting staff member. Despite being communicated to the Senior Leadership Team, these reports were not documented in registers, logs or repositories for policy breaches, concerns, complaints or incidents.

Performance management

Most coaches and support staff interviewed agreed that athlete safeguarding is not considered in performance reviews and performances reviews are based on performance outcomes such as winning medals, competitions, or world records. One coach stated that KPIs are currently 'dehumanising the experience.' Another coach stated 'we are doing a disservice to athletes by not considering [athlete] wellbeing' when considering performance at WAIS. Some coaches and support staff stated that without building wellbeing and safety of athlete into performance metrics then athlete safeguarding will not be taken seriously by all.

The current WAIS Board agreed that performance reviews of staff are based on medals won, performance outcomes and results.

Desktop review

Recruitment

- WAIS Human Resources Policies & Guidelines doesn't include requirements to embed athlete safeguarding within recruitment.
- Interview Guide, used as a guide for conducting interviews with potential staff members, includes a child safeguarding question asking the candidate to provide background on their experience in working with children, what were their role and responsibilities in relation to ensuring the safety of children.
- Recruitment Shortlisting Matrix Template, used for comparing shortlisted candidates does not include athlete safeguarding considerations.
- Reference Check Template, documenting key question to ask during reference checking, does not include any athlete-centric questions or any athlete safeguarding specific questions.
- NIF Safeguarding Children and Young People Policy (2024) Appendix 1, includes recruitment, screening and training recommendations. At the time of the review the recommendations and guidelines were not implemented into practice.

Setting expectations and holding people to account

- Staff Code of Conduct (2023) outlines some acceptable and unacceptable behaviours for staff such as not engaging in physical contact with athletes or colleagues except where absolutely necessary for the development of the individual or ability, refraining from initiating inappropriate intimacy or a relationship with an athlete and discourage any attempt by an athlete to initiate inappropriate intimacy or a sexual relationship with you and avoid unaccompanied and unobserved one on one activity with athletes under the age of 18 years.
- Athlete Code of Conduct (2022) requires athletes to pursue athletic excellence with sportsmanship, treat people with respect, use the sporting facilities and equipment with the highest consideration and observe the expectations of being a community role model.
- Athlete Code of Conduct Breach Register (redacted) documents all athlete breaches of the Athlete Code of Conduct including a description of the breach, the clause breached, how the athlete was made aware, the level of breach, the actions from meeting/ action of the CEO and if the breach was reported to the WAIS Board. However, there was no evidence provided that demonstrated that the Breach Register was reported to the WAIS Board. The Breach Register lacked consistent detail and completeness.
- A Staff Code of Conduct breach register did not exist.

Performance management

- Performance Excellence Framework (2018) does not include KRAs or KPIs relating to athlete safeguarding, wellbeing or the athlete experience.
- Example of a Performance Review - Coach documents an example of how the Performance Excellence Framework (2018) is operationalised. KPIs included the percentage of athletes who graduate from the sport program meeting the predefined targets, the percentage of athletes who renew their scholarships in accordance with the plan, and the effectiveness of coordinating human, financial, and operational resources to achieve strategic goals, enhance productivity, and improve the overall performance of the organisation."
- IAPP does not consider athlete safeguarding, the wellbeing of athletes or their experience.
- Role of the Chairperson and Deputy Chairperson states that the WAIS Board chairperson must lead an annual CEO performance review. No evidence was provided to demonstrate that historically the review considered performance as it relates to athlete safeguarding.

Impact

Without a rigorous recruitment process that embeds a commitment to safeguarding, WAIS risks fostering an unsafe environment for its athletes. Without setting clear expectations and holding individuals accountable, trust within WAIS can erode, leading to decreased morale among athletes and staff and a resistance to improvement due to a lack of consequences for misconduct. Unacceptable behaviours might increase as individuals sense they are beyond reproach.

The absence of accountability mechanisms can engender a toxic culture characterised by irresponsibility, blame-shifting, and complacency. A lack of accountability can lead to situations where injustice goes unchecked, potentially causing further harm to victims. Historical examples from WAIS have demonstrated the tangible impact when former staff members faced no repercussions for their actions, causing potential harm and abuse to athletes in different settings.

Evaluating staff performance should consider the wellbeing and safety of athletes, ensuring that these considerations are embedded in outcome measures. By adopting an approach that prioritises the perspectives and needs of athletes, WAIS will likely see an improvement in overall performance.

Recommendations

5.3.4.1 Embed athlete safeguarding into recruitment.

Aligning to the recommendations in Appendix 1 of the WAIS NIF Safeguarding Children and Young People Policy, embed key athlete safeguarding recruitment strategies. This includes:

- Developing appropriate selection criteria for a position is a valuable first step to reducing the risk of appointing someone who poses a safeguarding risk.
- All positions identified as athlete-contact or child-related should include WAIS commitment statement in the position description and any advertising.

- During interviews, questions regarding the applicant's suitability to work with athletes and children should be included.
- WAIS should conduct a minimum of two reference checks for the preferred applicant to gather additional information about the applicant's suitability to work in the role for which they have applied. Referees should be asked directly about any concerns they may have about the applicant working with athletes and children.

5.3.4.2 Develop a system to consistently hold people accountable.

- Review policies, procedures, and position descriptions to ensure clear expectations are set for all WAIS staff and athletes.
- Develop formalised mechanisms, such as registers, logs and records to capture the responses to breaches of the code of conduct and relevant athlete safeguarding policies. Ensure the registers capture all breaches including low level breaches. Align to Recommendation 5.3.3.1.
- Report on breaches of WAIS' policies and code of conduct through governance structures, see Finding 5.2.1.2 for more information.

5.3.4.3 Embed athlete safeguarding, wellbeing and experience indicators into performance metrics.

Aligned to the strategic objectives of the organisation, define metrics and indicators which measure individual's contributions to athlete safeguarding, wellbeing of athletes and the quality of athlete's experiences. See Finding 5.1.2 for more information regarding the strategic objectives of WAIS.

Regularly review performance in relation to safeguarding objectives during performance review processes, providing feedback and support where needed. Recognise and reward staff members who consistently demonstrate a commitment to safeguarding and actively contribute to creating a safe and inclusive environment within WAIS.

5.3.5 Athlete safeguarding incident management processes should be established.

Context

A safeguarding event is any event of harm or abuse and includes incidents that could have caused harm or abuse. Safeguarding incidents might involve peer on peer bullying, sexting or self-harm.

Safeguarding incidents and complaints are notably different. A safeguarding complaint is often also a safeguarding incident. A safeguarding incident refers to a specific event which often requires immediate management, whereas a safeguarding complaint refers to a complainant escalating and raising a safeguarding concern, issue or feedback. A safeguarding complaint requires handling and a response from the organisation which may include enacting the safeguarding incident management process.

Safeguarding incident management is a structured process by which organisations handle cases where the wellbeing and safety of an individual might be in danger. This often involves protection from abuse, neglect, exploitation, and other forms of harm.

The 2024 Integrity Operational Plan notes that WAIS will seek to develop and implement a critical incident framework in 2024.

Findings

Areas for improvement

Incident Management Policy

An incident management policy does not exist at WAIS to support the systematic identification and appropriate handling of safeguarding incidents. A definition of safeguarding incidents and roles and responsibilities relating to incident management are not defined.

Whilst the NIF Safeguarding Children and Young People policy (2024) defines mandatory reporters and the Staff Code of Conduct (2023) states staff have an ethical responsibility to make a report if they form a belief, based on reasonable grounds in the course of their paid and unpaid work that child sexual abuse has occurred or is occurring, no policy outlines who are considered mandatory reporters at WAIS, their responsibilities and the process to report.

Incident Management Process

There is no defined, embedded and communicated process to handle incidents. The following was noted in relation to the management and handling of safeguarding incidents.

- Identifying safeguarding incidents. WAIS has not defined a standard approach for identifying safeguarding incidents. There is no guidance on signs of harm and abuse. Critical incidents, which are traumatic events, or the threat of such which has the potential to harm life or wellbeing and causes extreme stress, fear or injury to the person experiencing or witnessing the event, are not defined.
- Immediate response to an incident. Whilst some WAIS policies, such as the NIF Safeguarding Children and Young People policy (2024) Annexure A and AIS Mental Health policy (2023), outline steps to respond to a risk of immediate harm, a consistent approach is not defined. Immediate response should include contacting emergency services, separating the alleged victim and others involved ensuring all parties are supervised, preserving any items that may amount to evidence and offering support to those affected. What to do if a critical incident occurs should also be defined.
- Classification of incident types. A process to classify types of incidents does not exist. Without a classification system for incidents, there are challenges in prioritising, addressing, and reporting them based on severity and type. For example, a critical incident is a type of incident and should be classified and responded to appropriately.
- Reporting the incident. A process to report all incidents, suspicions and disclosures as soon as immediate health and safety concerns are addressed is not defined. A clear line of escalation, both internally and externally, aligned to incident types does not exist. For example, when to report externally to the relevant authorities such as police and/or WA Department of Communities. When to report internally to the Integrity and Safeguarding Manager, Performance Team Director, CEO and WAIS Board. The reporting process for mandatory reporters is not defined. Additionally, a requirement to record all actions taken and key details about the incident should be embedded.

- **Contact relevant stakeholders and ongoing support.** A process to contact relevant stakeholders such as an athlete's parent or guardian should be defined. Information about when to contact or situations where it is not appropriate to contact a stakeholder, what to say and to who should be conducting the conversation is not defined.

WAIS must provide ongoing support for all parties involved in an incident. This includes victims, offenders, staff involved in handling the incident and any other impacted party. For example, athletes who witnessed the incident. Ensure debriefing, counselling and support is offered to all parties as appropriate. The process to engage allied health and wellbeing professionals and external supports should be defined.

- **Maintaining confidentiality.** Processes to promote and maintain confidentiality within the incident management process do not exist. The process to store and secure any incident records containing sensitive information must be documented.
- **Review the incident.** The process to review incidents and critical incidents is not documented or defined. Some critical incidents may require investigation. The categorisation and type of incident will impact the process of review that is followed. WAIS should identify and document the role and responsibilities for incident reviews.
- **Action tasks and close the incident.** All incidents must be assessed with consideration for the person affected by the incident. WAIS does not have a process to reflect on the incident which includes considering if the incident could have been prevented, how well the incident was managed and resolved and what, if any remedial actions must be taken to prevent further similar incidents from occurring, or to minimise their impact. WAIS must define processes to develop an appropriate action plan to respond to the incident and close the incident when actions are completed.
- **Analyses and improve.** There is no single process to manage incidents, particularly as they related to athlete safeguarding, to ensure consistency in the handling, recording and reporting of incidents in a consistent and effective manner. As a result, incident data is not captured, reviewed, analysed and reported through governance structures to support continuous improvement and to prevent the risk of systemic issues going unaddressed. Refer to Finding 5.2.1.2 for more information regarding reporting to governance structures.

Awareness and understanding of safeguarding incidents.

Awareness and understanding of what constitutes a safeguarding incident, including how to recognise signs of abuse and harm should be strengthened. Whilst ad-hoc training has been provided on identifying abuse in the past, consistent information embedded into annual training does not exist to enhance awareness and understanding.

It was observed that some staff were unaware of their reporting obligations for the specific incidents or complaints. WAIS lacked clear instructions regarding the mandatory reporting responsibilities for health practitioners, such as doctors.

Data collected

Focus groups and interviews

Athletes, coaches, support staff and family members interviewed spoke of safeguarding incidents noting no formal process to respond and manage incidents existed.

- Some athletes spoke about safeguarding incidents that were not reported or managed. For example, one athlete shared that they had experienced unwanted touching, another sharing that they experienced verbal abuse.
- Some family members spoke about safeguarding incidents that had occurred and were raised informally with WAIS. For example, an incident of young people under 18 traveling to an interstate competition without a chaperone.
- Some coaches and support staff raised examples of incidents, such as athletes self-harming, mental health concerns, peer-on-peer bullying or safety concerns outside of WAIS such as family domestic violence and noted there was no formalised incident management process at WAIS including no process to manage critical incidents or report incidents within WAIS, or to authorities if required.

It was noted that coaches and support staff may have been unaware of their reporting obligations, as relevant staff never discussed mandatory reporting requirements, instead emphasising privacy over the duty to report incidents.

Members of the Senior Leadership Team agreed that incident management requires enhancement including clear incident categories and corresponding lines of escalation.

Desktop review

- No policies, procedures or documents exist detailing the process to identify and manage athlete safeguarding incidents.
- WAIS Disordered Eating Early Identification and Prevention policy (2023) states WAIS staff must inform a WAIS sports dietitian, psychologist, CMO or sport physician of any concerns related to an athlete's eating behaviour, thoughts, or body image. The policy does not identify disordered eating as a safeguarding incident nor refer to incident management processes.
- WAIS Mental Health policy (2023) documents the process to manage mental health concerns which includes initial assessment and clinical management including treatments. Additionally, the policy addresses mental health critical incidents. Whilst the policy highlights mental health concerns and mental health critical incidents, an overarching process to manage incidents and critical incidents does not exist.
- NIF Safeguarding Children and Young People policy (2024) Annexure A outlines the process to report any reasonable suspicion or knowledge that a child or young people is or is likely to be at risk of harm. The policy, which has not yet been implemented, outlines the steps to take to report suspected abuse to WA Department of Communities. The annexure does not detail the procedures pertaining to incident management.

Impact

Without defined incident management processes, incidents will not be handled consistently, there will be insufficient record keeping, reporting and analysis impacting prevention of systematic issues. This oversight compromises continuous improvement efforts, erodes athlete confidence, and exposes WAIS to legal and reputational risks. Ultimately, lack of structured approaches to incident management can increase the potential of harm to athletes.

Recommendations

5.3.5.1 Develop an incident management process.

- Establish clear policies that define the scope, objectives, and principles of incident management within WAIS including mandatory reporting.
- To support the effective management of safeguarding incidents, WAIS should establish clear protocols and procedures for their handling, including mechanisms for the swift identification and classification of incidents, procedures for immediate response to incidents and criteria for escalating issues to higher levels of management and details on how and when to communicate with internal and external stakeholders, including the authorities.
- Develop guidance on the collection and management of relevant data and documentation, to ensure that all incidents are properly recorded, and data can be analysed and reported on. As per Recommendation 5.3.3.1, embed oversight and assurance mechanisms to ensure ongoing and active review of incidents (including Mandatory Reports) handled by WAIS. This may include the introduction of a system or repository which supports centralised capture of critical information.
- Regularly train staff on the incident management process and promote awareness throughout WAIS.

5.4 Engagement and awareness

Effective safeguarding hinges on actively engaging athletes, their families and WAIS staff. Engagement and awareness focuses on educating athletes about their rights and ensuring their participation in decision-making. It's crucial that organisations foster a culture where athlete-centred practices are integrated into operations. Establishing procedures and structures that acknowledge each athlete's unique needs, abilities, and experiences is fundamental to athlete safeguarding. Staff must be equipped with the necessary knowledge and skills to keep athletes safe from harm to create safe environments.

5.4.1 Improve athlete safeguarding engagement and awareness for athletes and their families.

Context

Athletes who understand safeguarding and their rights are empowered to advocate for fair treatment, can be protected from harm and abuse, feel confident to raise issues, concerns or complaints and can promote positive change within WAIS.

Involving athletes in decision-making means they can offer different perspectives to decisions that may ultimately impact them. This process involves consulting with athletes frequently and making appropriate changes based on the information that is shared. Where an athlete is under 18 years old, their parents and guardians should be engaged. Involving athletes in the decision-making process directly influences their sporting journey, allowing them to actively shape their experiences. This empowerment extends beyond the realm of sport, equipping athletes with the skills and confidence necessary for a successful transition into life after sport.

Findings

Strengths

Majority of those surveyed agreed that they understood what athlete safety means, athletes spoke about learning about athlete safeguarding through many sources including education from their NSO, schools or other childhood experience and WAIS policies. Additionally, current athletes noted they are supported to balance life outside their sporting endeavours including work, university and schooling commitments.

Areas for improvement

Education and awareness

A coherent, consistent approach to safeguarding education, awareness and communication for WAIS athletes and their families, is not in place. The following was noted.

- A consistent, clear policy that documents the requirements for induction and ongoing education, who must complete the education and the potential repercussions for individuals who fail to keep their education credentials up to date does not exist. Currently scholarship athletes are required to complete education whereas no athlete safeguarding education, training and guidance is provided to training agreement athletes or family members.
- It is evident that key safeguarding concepts have not been consistently incorporated throughout education initiatives. This includes topics such as athlete's right to be protected from abuse, neglect, harm and exploitation and their rights to safeguarding information and participation.
- Education completion and participation is not recorded or monitored. WAIS is currently not aware which athletes have or have not completed induction or annual training courses. Monitoring over training completion does not occur as training completion is not recorded.
- Regular review and enhancement of education programs based on a variety of factors, including emerging risks, insights gained from complaints and incidents, contemporary best practises, and regulatory changes does not occur.
- Communication and information provided to families is ad hoc and does not address safeguarding concepts. It was noted, through interviews, that family members felt they did not receive education, information or training

relating to athlete safeguarding. The Parent and Partner Induction materials includes no information on athlete safeguarding.

Engagement

Athletes and their families are not consistently involved in decision-making processes that directly affect the athletes. The following was noted:

- There are no formal mechanisms through which athletes are engaged to input on policies or processes which impact them. This includes athlete advisory bodies, working groups or forums. However, it was noted that the WAIS Board and Management had made a commitment to implementing an Athlete Advisory Committee to address this identified gap.
- Governance structures do not adequately represent or consider the perspectives of current athletes.
- Whilst athletes are involved in the development of IAPPs, it was noted that some athletes felt like they were not listened to. One athlete stated, 'my opinions meant nothing when I was on the bottom of the scholarship ladder,' another said, 'I felt I was not listened to and neglected from both an athlete and personal perspective.'

Data collected

Survey

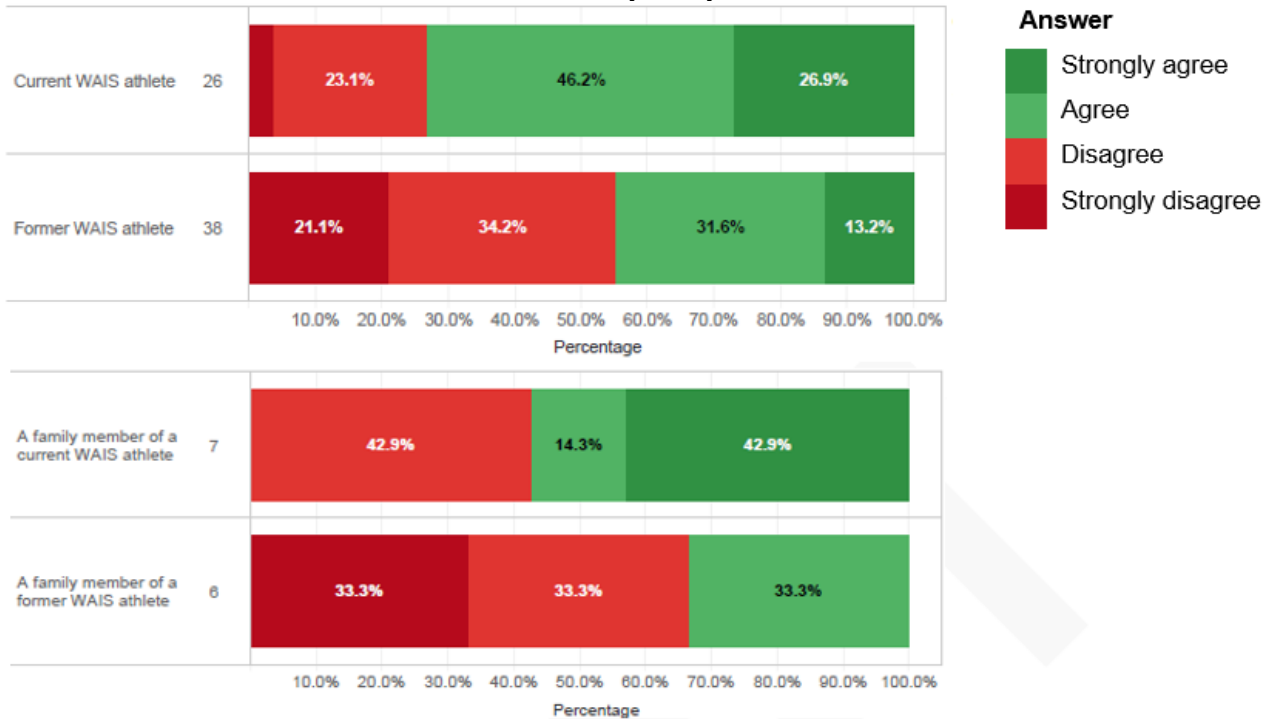
Athletes had a general understanding and awareness of what athlete safeguarding means; however, when explored in interviews and focus groups it was noted this general understanding often came from outside of WAIS. For example, many athletes spoke of learning through life experiences and their NSO.

- 47 out of 64 (73%) athletes surveyed responded yes when asked if they understand what the term athlete safety means.
- 13 out of 13 (100%) family members of athletes surveyed agreed or strongly agreed when asked if they understand what the term athlete safety means.
- 56 out of 64 (87.5%) athletes surveyed agreed or strongly agreed that they understand what safe and unsafe behaviours are.

Half of athletes and their families agreed that WAIS provided information to raise awareness and understanding of athlete safeguarding.

- When asked how they have been made aware of what unsafe behaviours are, respondents were given the opportunity to select multiple options. The following responses were recorded:
 - 46 out of 77 (60%) athletes and family members stated WAIS policies and procedures
 - 34 out of 77 (44%) athletes and family members stated WAIS staff
 - 24 out of 77 (31%) athletes and family members stated training and guidance
 - 17 out of 77 (22%) athletes and family members stated they have not been made aware
 - 11 out of 77 (14%) athletes and family members stated posters.
 - 4 out of 77 (5%) athletes and family members chose 'other' stating the following examples 'speaking to family and friends,' 'NSO, AIS, AHRC,' 'education (Teacher) background of parents' and 'discussions with multiple government agencies and Minister's office.'
- 41 out of 77 (53%) athletes surveyed agree or strongly agree that they receive information and guidance on what it means to be safe at WAIS.

- The graph, below, illustrates the responses to the following survey question: I receive information and guidance on how WAIS staff and coaches should treat me or my family member.



Graph 10: Perceptions of guidance received regarding how WAIS staff and coaches should treat athletes.

Athletes demonstrated mixed responses when asked about their understanding of their rights. Interviews and focus groups expanded on this and identified that older athletes with relatively longer experience in the high performance sport environment indicated a stronger understanding and greater confidence in advocating for their rights and involvement in decision-making. Athletes were asked if they understand their rights when it comes to their safety and wellbeing, the following was recorded:

- 11 out of 64 (17%) of athletes surveyed stated they were completely aware of their rights.
- 19 out of 64 (30%) of athletes surveyed stated they were mostly aware of their rights.
- 25 out of 64 (39%) of athletes surveyed stated they were somewhat aware of their rights.
- 9 out of 64 (14%) of athletes surveyed stated they were not aware of their rights.
- A current athlete who responded to the survey stated, 'My coach's success was more important than my physical and mental well-being.'

Family members of athletes surveyed were more likely to be aware of their child's rights and involved in decision making. This was explored through interviews and focus groups where family members explained this was often because of life experience, professional experience (for example parents who were also teachers) or through their own research. Parents involvement in decision making when their child was under 18 years of age was often facilitated via obtaining consent.

- 10 out of 13 (77%) family members of athletes surveyed were aware or mostly aware of their family member's rights when it comes to safety and wellbeing.
- 10 out of 13 (77%) family members of athletes surveyed agreed or strongly agreed that they felt appropriately involved in the decision making regarding their family member/s.

Focus groups and interviews

Education and awareness

Most scholarship athletes stated they had undertaken an induction program to learn about athlete safeguarding, which included reviewing policies and undertaking a formal assessment, upon their commencement with WAIS and annually thereafter. All training agreement athletes confirmed that they do not receive policies or a formal induction upon their commencement at WAIS, with most athletes advising that they learn about acceptable and unacceptable behaviours through life experience. Some coaches and support staff described how training agreement athletes

would benefit from having access to athlete safeguarding policies and education to ensure they are aware of their rights and have access to safeguards such as complaint mechanisms.

Athletes interviewed agreed that they were bound by the Athlete Code of Conduct which outlined acceptable and unacceptable behaviours of athletes. Current athletes indicated that, while coaches and support staff provided education on acceptable and unacceptable behaviours from a staff perspective, there were still some grey areas that remained unclear. This included unwanted attention and inappropriate touching.

Most family members interviewed stated they did not receive education, information or training relating to athlete safeguarding. Some coaches, support staff and management recommended delivering further training on athlete safeguarding, policies and expectations to parents, including parents of athletes under 18 and between 18-21 years old.

Engagement

Most athletes felt they were involved in decisions that affected their daily training environment, giving examples of WAIS adjusting training schedules depending on school, university or work commitments. Some current athletes described:

- how their confidence in discussing their individual needs outside of the context of performance grew with time.
- needing to advocate on behalf of themselves to ensure programs are adapted to their needs, however, described how this may be challenging for junior athletes or athletes who have not engaged in this process before. An athlete described feeling as though their 'opinions meant nothing' when they were beginning their sporting career.
- that some coaches and support staff prioritised 'putting the person before the athlete.'

Conversely, some athletes and families of athletes described how historically some coaches and support staff prioritised performance above the needs of the athlete. For example, some families of athletes described how they 'begged for balance between studies and sporting commitments', noting that coaches and support staff were not always receptive when athletes required time-off to attend to schooling. Most families stated they were not provided access to WAIS policies or documents about athlete safeguarding.

Most coaches and support staff described how athletes are involved in performance planning and program development through yearly reviews and the development of IAPPs. Some coaches noted that this was a 'box ticking' exercise rather than a genuine partnership or collaboration with the athlete.

Most athletes, coaches and support staff stated athletes were not involved in policy decisions that affected them. One staff member stating, 'athletes have no voice in policy development' and noted that processes could be more 'athlete centric.'

Athletes discussed the idea of implementing an athlete advisory body to ensure their voice could be heard, they could be engaged as a representative body in decision making and could provide feedback and communicate with the Senior Leadership Team and WAIS Board. Additionally, athletes stated that a forum that offers an additional avenue for independent complaints raising, noting that junior athletes and training agreement athletes would benefit from raising concerns to a respected member of their cohort would be beneficial. Former members of management and former members of the WAIS Board also highlighted the importance of implementing an athlete advisory body, and the current WAIS Board confirmed that WAIS had approved the implementation of an athlete advisory body, which is expected to commence in 2024.

Desktop review

Education and awareness

- The Athlete Induction Template 2023-24, used for scholarship athlete induction, lists WAIS' guiding principles which includes athlete care. The Template states, 'WAIS' priority is to ensure we provide a safe environment for all athletes, especially young people' and 'if you have a concern with anything involving your sport or WAIS, please report it'. No other elements of athlete safeguarding are explored in the induction module including how WAIS provide a safe environment. For example, it does not cover topics such as safeguarding key concepts, why safeguarding is important, acceptable and unacceptable behaviours and the process regarding concerns, complaints or incidents beyond asking athletes to speak to someone they are comfortable speaking with.
- At the time of the Review, there was no formal onboarding or education program to inform and empower athletes on the following:
 - their rights to safeguarding, information and participation
 - their right to be protected from abuse, neglect, harm and exploitation
 - supports that uphold, promote and respect their legal and human rights

- supports that respect their culture, diversity, values and beliefs
- supports that respect and protect their dignity and privacy.
- Parent and Partner Induction materials include information on child safeguarding and complaint handling aligned to the Athlete Induction Template. This is supplemented with a Parent and Partner Induction materials which includes no information on athlete safeguarding. At the time of the Review, the Parent and Partner Induction materials and supplementary pack were in draft and had not been implemented.
- Sport Integrity Australia eModule system extract completion log is a log capturing athlete's completion of the Sport Integrity Australia National Integrity Framework education modules. The extract is a list of completed education only, it lacks information regarding individuals with outstanding education modules and when refresher education should be completed.
- An example of the Athlete Compliance Dashboard documents education that is required for athletes to complete, this includes the Sport Integrity Annual Update, Competition Manipulation and Anti-doping. Athlete safeguarding education is not included as a requirement in the Dashboard.
- Safe and Ethical Practice Policy Framework Compliance Report (May 2023), provided to the Audit and Risk Committee and WAIS Board, identified that records of athlete induction could not verify that all inductions had been completed. The Safe and Ethical Practice Policy Framework Compliance Report (May 2023) is not a standing agenda item on the Audit and Risk Committee and WAIS Board.
- Records of athlete induction completion were not provided.
- Athlete Code of Conduct requires athletes to pursue athletic excellence with sportsmanship, treat people with respect, use the sporting facilities and equipment with the highest consideration and observe the expectations of being a community role model. The Athlete Code of Conduct does not document an athlete's rights. Athlete Transitions Policy support WAIS staff in providing guidance to athletes transitioning "within their athletic lifecycle" including in continuing in sport or post-sport life.

Engagement

- Stakeholder Survey Athlete Response Overview Dashboard 2019-2022 evidence an athlete survey was conducted in 2019, 2020 and 2022. Results are high level and do not provide an indicator of how athlete safeguarding, and the athlete experience is performing. The survey considers athlete satisfaction with IAPPs, training opportunities, feedback, and support. Some survey questions were redacted. The detailed results were not provided.
- Results from the AIS Daily Performance Environment (DPE) Insights Survey which commenced in 2022 were requested and not provided by WAIS to inform the Review.

Site Visits

- It was observed during site visits that WAIS facilities or facilities utilised by WAIS athletes did not publicise information regarding athlete rights.

Impact

Without education for athletes and families on athlete safeguarding principles understanding and awareness of relevant policies and procedures is diminished. This gap in knowledge might prevent the recognition and reporting of safeguarding concerns or complaints, thus increasing the risk of reported harm or abuse. Educating athletes and families is crucial for proactive protection and the prevention of harm.

Without inclusion in decision-making processes, athletes will not have a sense of agency and ownership over their sporting careers. Limiting their ability to voice their opinions, express concerns, and contribute to the development of policies and practices that affect them directly.

Recommendations

5.4.1.1 Improve athlete safeguarding education for athletes and their families.

- Develop and implement a safeguarding education plan for athletes, including training agreement athletes, and their families. This should encompass the definition and importance of safeguarding, key concepts, procedures, and clear guidance on recognisable behaviours that are unacceptable or inappropriate and specific to the WAIS physical and online environments. Include education on the complaint and incident processes including educating on the numerous avenues to raise concerns or complaints.

- Monitor education completion and report through governance structures.
- Updated education regularly based on lessons learned and continuous improvement.

5.4.1.2 Promote athlete rights within WAIS.

Develop posters which document athlete rights and display them within WAIS. Child friendly posters should be available.

5.4.1.3 Enhance athlete and family engagement.

- Implement feedback mechanisms to gather input from athletes and their families, ensuring their voices are heard and their needs are addressed.
- Ensure the implementation of an athlete advisory body occurs as planned.
- Establish regular communication channels to keep athletes and their families informed about upcoming events, training schedules, and organisational updates.
- Organise family-friendly events such as open training sessions, meet-and-greets with coaches, and informational workshops to foster a sense of community and involvement.

5.4.2 Mechanisms to promote diversity and inclusion should be developed.

Context

Organisations are strengthened when diversity and inclusion is celebrated, valued and respected and where procedures and structures are in place to recognise athlete's unique needs, abilities and experiences.

Diversity describes a range of personal characteristics, circumstances, life experiences and backgrounds. The combination of these differences makes up an individual's unique identity and shapes the way they experience the world and the types of needs they have. WAIS should consider:

- cultural safety for Aboriginal and Torres Strait athletes
- the needs of athletes with disability and responses to disability
- the needs of athletes from diverse religious and cultural communities
- the needs of very young athletes
- the impact of prior trauma, abuse or exposure to family domestic violence
- gender differences
- the experiences of lesbian, gay, bisexual, transgender and intersex athletes
- challenges for athletes living in remote locations.

National Generation 2032 Coach Program (Gen32) aims to increase the number and diversity of high performance coaches around Australia, through a two-year intensive coach development program for aspiring pathway and early career high performance coaches. The program is a key component of the AIS High Performance Coach Development Strategy and is delivered in partnership with the NIN including WAIS.

It was observed through site visits that elements of the HPSC were accessible. For example, an elevator is in operation between the WAIS underground carpark to the HPSC foyer, which facilitates access to the HPSC gym. Further, the HPSC gym has an area for service dog parking.

Findings

Areas for improvement

WAIS must strengthen diversity and inclusion practices to ensure athlete's unique needs, abilities, and experiences are considered and supported. The following was noted.

- WAIS does not have diversity and inclusion plans or policies. A stated commitment to athlete diversity and inclusion does not exist.
- WAIS does not have a formalised process or mechanisms in place to identify and capture the diverse needs of athletes. They therefore do not have a systematic approach to supporting the diversity and inclusion of athletes within the WAIS community.
- Whilst athletes and coaches agreed that diversity and inclusion is considered on an ad hoc basis, currently WAIS does not recognise that some athletes are more likely to be at risk of harm and abuse and implement safeguards accordingly.
- WAIS do not identify, manage and mitigate risks associated with the diverse needs of athletes. Refer to Finding 5.3.1 for more information regarding safeguarding risks.
- Coaches and support staff do not receive training on athlete diversity, athlete inclusion or cultural competency.

Data collected

Survey

Coaches and support staff demonstrated a commitment to understanding and meeting the unique needs of athletes. However, when this was explored further in interviews and focus groups, it was noted that coaches and support staff do not receive training and guidance from WAIS on how to do so and therefore challenges can arise.

- 21 out of 24 (87.5%) coaches and support staff surveyed agreed or strongly agreed that staff had the skills to recognise and respond to the safety and wellbeing concerns of athletes with diverse needs such as athletes with a disability, mental health needs, gender and sexual identity or cultural diversity.
- 22 out of 24 (92%) coaches and support staff surveyed agreed or strongly agreed that there should be differing approaches to how child athletes and adult athletes are coached.

Interviews and focus groups

- Most athletes confirmed that their diverse circumstances, including their diverse abilities are taken into consideration by coaches and support staff. Most athletes noted that due to the nature of high performance sport, diverse groups may be underrepresented.
- Athletes living with disability advised that considerations regarding their diverse abilities were not always factored into the formulation of training schedules. For example, one athlete who utilised a wheelchair for mobility purposes described being asked to complete squats by a support staff member. The athlete advised that once concerns were vocalised the training schedule was adapted to their needs.
- Most coaches and support staff described how athletes' diverse circumstances are considered on a case-by-case basis. Most staff confirmed that they had not undertaken formal training on athlete diversity, athlete inclusion or cultural competency, they also advised that this is an area for improvement and that they could seek out resources if the situation arose where they required guidance. Additionally, when asked about vulnerability of athletes, most coaches and support staff flagged the mental health of athletes and other forms of vulnerability were not identified.

Desktop review

- WAIS does not have diversity and inclusion plans or policies.
- The absence of demographic data indicates that diversity and inclusion metrics are neither collected nor taken into consideration at WAIS.

Impact

Without considering the diverse needs of athletes, WAIS risks creating an environment that is neither athlete-centred nor empowering. This can lead to a culture that fails to recognise or build upon the individual strengths and characteristics of each athlete. Such oversight may result in environments that are not culturally safe or inclusive, thereby heightening the risk of discrimination, exclusion, bullying, and abuse.

Recommendations

5.4.2.1 Consider the diverse needs of WAIS athletes and the WAIS community.

- Understand the diversity of athletes at WAIS and in the WAIS community.
- Conduct a comprehensive assessment of current practices and policies to identify areas for improvement in diversity and inclusion.

5.4.2.2 Consider the development of a diversity and inclusion plan and commitment at WAIS.

- Develop a plan outlining specific goals, timelines, and measurable outcomes for promoting diversity and inclusion at all levels of the organisation.
- Establish a project team responsible for driving diversity and inclusion initiatives within WAIS, comprising representatives from diverse backgrounds.
- Implement mandatory diversity and inclusion training for all staff, including coaches and support staff, to foster a culture of understanding, respect, and inclusivity.
- Regularly evaluate progress and adjust strategies as needed to ensure continuous improvement and alignment with the organisation's values and objectives.

5.4.3 Enhance education for WAIS staff, volunteers and contractors to uplift awareness and understanding of athlete safeguarding.

Context

Organisations must equip their staff with the knowledge and skills required to keep athletes safe and provide ongoing education. Staff must be supported to implement the organisation's policies and take action in response to safeguarding concerns. When an organisation's staff are appropriately informed, educated and supported, they are more likely to uphold the organisation's safeguarding values and practices.

WAIS provides education to staff through yearly induction and ad-hoc athlete safeguarding training. WAIS Human Resources Manual (Version 2.5) requires all new permanent, fixed term and core casual staff to participate in induction. Annually, all staff and independent contractors must complete Safe and Ethical Practice Policy Framework, induct. It includes policy requirements relating to the Safe and Ethical Practice Policy Framework with knowledge checking questions.

Examples of ad-hoc athlete safeguarding education provided to staff and some contractors during the review period include:

- National Integrity Framework (2024)
- Policy Training – Child Safeguarding (2022)
- Policy Training – Disordered Eating (2022)
- Policy Training – Supplements (2022)

Following the adoption of the NIF, WAIS has collaborated with Sport Integrity Australia to design and develop an Education Plan to raise awareness and understanding of the NIF and ongoing education aligned to the NIF policies. Training on NIF policies has commenced via eLearning.

Findings

Strengths

Majority of staff involved in the review demonstrated a basic understanding of athlete safeguarding. Individuals in athlete-facing roles showed a deeper comprehension of the potential risks and challenges associated with athlete safeguarding within the WAIS context.

Areas for improvement

A coherent, consistent approach to safeguarding education for all WAIS staff, volunteers and contractors, is not in place. The following was noted.

- A consistent clear policy that documents the requirements for induction and ongoing education, who must complete the education and the potential repercussions for individuals who fail to keep their education credentials up to date does not exist.
- A targeted skills matrix does not exist to ensure that the skillset and capabilities of all staff, volunteers and contractors is aligned to their role, and to the needs and expectations of WAIS. Current education lacks completeness and quality. It is evident that key safeguarding concepts have not been consistently incorporated throughout education initiatives. This includes topics such as identifying and responding to abuse, raising complaint and support inclusion and diversity.
- Monitoring of education completion is currently manual and lacks consistency. The process to monitor completion is not documented, therefore it is unclear what is currently being monitored. For example, monitoring education completion of knowledge assessments and competition beyond attendance. Evidence was not provided to demonstrate reporting of education completion through governance structures. Refer to Finding 5.2.1.2 for more information regarding reporting.
- Regular review and enhancement of education programs based on a variety of factors, including emerging risks, insights gained from complaints and incidents, contemporary best practises, and regulatory changes does not occur.
- Roles and responsibilities for the aforementioned tasks should be defined and implemented. Refer to Finding 5.2.2 for more information regarding roles and responsibilities.

For information regarding education for athletes and families please refer to Finding 5.4.1.

Data collected

Survey

Most staff and WAIS Board members surveyed agreed that they understand the term athlete safeguarding and are confident in recognising safe and unsafe behaviour whilst at WAIS. When explored further through interviews and focus groups, staff highlighted that general awareness of athlete safeguarding comes from multiple sources, this includes life experience, education provided by NSOs and other professions.

- 23 out of 24 (96%) coaches and support staff surveyed responded yes when asked if they understand what the term athlete safety means.
- 7 out of 8 (87.5%) administrative staff surveyed responded yes when asked if they understand what the term athlete safety means.
- 7 out of 7 (100%) management staff surveyed responded yes when asked if they understand what the term athlete safety means.
- 3 out of 3 (100%) former WAIS Board members surveyed responded yes when asked if they understand what the term athlete safety means.
- 17 out of 24 (71%) coaches and support staff stated they were very confident when asked to rate their level of confidence in recognising safe and unsafe behaviour whilst at WAIS.
- 9 out of 15 (60%) administrative and management staff stated they were very confident when asked to rate their level of confidence in recognising safe and unsafe behaviour whilst at WAIS.

Majority of staff surveyed agreed that WAIS informs them about athlete safeguarding through policies and procedures. It was noted, when further explored in interviews and focus groups, that education was focused heavily on policy requirements and not capacity building.

- When asked how respondents have been informed about the rights of athletes to be safe from harm, they were given the opportunity to select multiple options. The following responses were recorded:
 - 24 out of 24 (100%) coaches and support staff stated WAIS policies and procedures.
 - 19 out of 24 (79%) coaches and support staff stated training and guidance.
 - 11 out of 24 (46%) coaches and support staff stated WAIS staff.
 - 1 out of 24 (4%) coaches and support staff stated posters.
 - 0 out of 24 (0%) coaches and support staff stated they have not been made aware.
- When asked how respondents have been informed about athlete safety, the following was recorded:
 - 15 out of 15 (100%) administrative and management staff stated WAIS policies and procedures.
 - 9 out of 15 (60%) administrative and management staff stated training and guidance.
 - 9 out of 15 (60%) administrative and management staff stated WAIS staff.
 - 0 out of 15 (0%) administrative and management staff stated they have not been made aware.
- 23 out of 24 (96%) coaches and support staff agreed or strongly agreed that staff behave in a way that is consistent with the athlete safety and wellbeing information and guidance they receive.
- 13 out of 15 (87%) administrative and management staff agreed or strongly agreed that staff behave in a way that is consistent with the athlete safety and wellbeing information and guidance they receive.

Interviews and focus groups

- All coaches and support staff confirmed that they were required to undertake an induction program upon their commencement at WAIS, however, some staff expressed that the induction was general in nature and not specific to athlete safeguarding. Some staff stated it was a box ticking exercise. Most coaches and support staff agreed that ad hoc safeguarding training was provided throughout the Review Period.

- Most coaches and support staff confirmed that they were bound by a code of conduct, with some staff stating that this document outlined acceptable and unacceptable behaviours. When asked how they learned about acceptable and unacceptable behaviours, most coaches and support staff said it was 'common knowledge.'
- Management advised that safeguarding education is provided by WAIS but also Sport Integrity Australia and the relevant NSOs.

Desktop review

- WAIS Human Resources Manual (Version 2.5) doesn't include the requirement for staff, contractors and volunteers to undertake ongoing training. Whilst staff noted they complete iinduct training annually, this requirement is not defined in the Manual.
- Safe and Ethical Practice Policy Framework states WAIS will provide staff, athletes and students with a formal induction in, and annual education on, the Safe and Ethical Practice Policy Framework. However, it is unclear how annual education is conducted in practice. Additionally, this requirement does not include volunteers.
- Safe and Ethical Practice Policy Framework iinduct (induction module) reflected that staff are onboarded to the WAIS policies, however, there is no induction training which addressed WAIS' safeguarding strategy, framework or key safeguarding concepts and practices. The following concepts are not included:
 - Prevention: understanding how to recognise and address potential risks of harm and abuse before they escalate into harm. Refer to Finding 5.3.5 for more information regarding raising safeguarding incidents.
 - Early intervention: knowing when and how to intervene at the earliest signs of concern to prevent further harm.
 - Risk assessment: assessing the level of risk posed to athletes and implementing appropriate measures to mitigate those risks.
 - Complaints, concerns and incidents: understanding how to report concerns including internally and externally beyond Mandatory Reporting. Refer to Finding 5.3.5 for more information regarding incident management.
 - Empowerment: ensuring athletes are empowered with knowledge and resources to protect themselves and seek help when needed. Refer to Finding 5.4.1 for more information regarding education and awareness of athlete's rights.
 - Confidentiality: understanding the importance of confidentiality in safeguarding and the circumstances under which information should be shared.
 - Equality and diversity: recognising and respecting the diverse needs and experiences of athletes and ensuring that safeguarding practices are inclusive and accessible to all.
- Whilst the Education Slides titled "Child Safeguarding (2022)" includes education about what is child abuse, understanding grooming and reporting abuse, it is ad-hoc and not a requirement for all staff to complete.
- WAIS NIF Education Plan (2024) and WAIS NIF Commencement – Initial Education Plan (2023) only relate to education provided by Sport Integrity Australia and does not include training beyond the NIF policies.
- Staff completion of the iinduct (induction module) compliance (2022), policy education workshops and Sport Integrity Australia (2022) training is recorded in the Staff Compliance Spreadsheet (redacted). The Staff Compliance Spreadsheet captures staff, casual staff, and independent contractors. Volunteers are not included. The Staff Compliance Spreadsheet is incomplete and out of date as it includes Sport Integrity Australia training from 2022 which has since been updated.

Impact

Insufficient safeguarding education for WAIS staff may result in a lack of awareness regarding safeguarding policies, procedures, and key concepts. This deficiency could lead to staff being unable to identify safeguarding issues or concerns, potentially resulting in harm going unreported or undetected. Without proper education, there is a heightened risk of athletes being harmed due to a lack of proactive measures to ensure their safety.

Recommendations

5.4.3.1 Enhance athlete safeguarding education for staff, volunteers and contractors.

- Develop a policy or enhance the Human Resource Manual to outline the requirements for both induction and ongoing training. This policy should detail who is required to undertake the training, specify the frequency of training, and describe the consequences for non-compliance.
- Develop a targeted skills matrix that maps out the necessary safeguarding skill sets and competencies required for each role within WAIS, aligned with the expectations of WAIS.
- Based on the skills matrix, and aligned to the NIF Education Plan, implement a training program which considers the following.
 - Safeguarding induction and ongoing training aligned to WAIS safeguarding strategic objectives and framework. See Recommendation 5.1.2.1 and 5.1.2.2.
 - Timing of induction and refresher training, the frequency of ongoing training and structured mechanisms for ongoing education.
 - Consultation with staff and athletes to identify gaps in training.
 - Mechanisms for embedding continuous improvement and lessons learned into training.

Section 6:

Interview and focus group outcomes

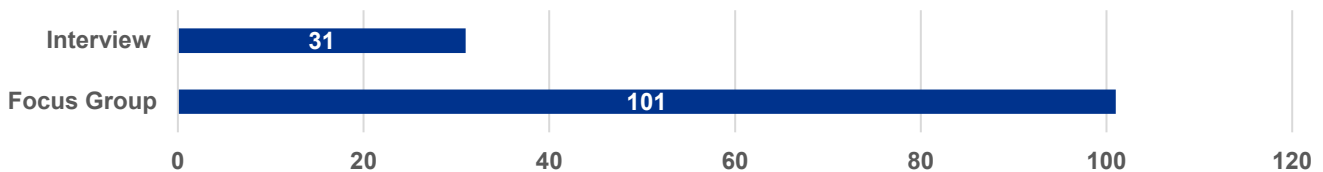
6.1 Overview of participants

A total of 47 interviews and focus groups were conducted between November 2023 to March 2024. Interviews and focus groups were conducted with the following respondent groups:

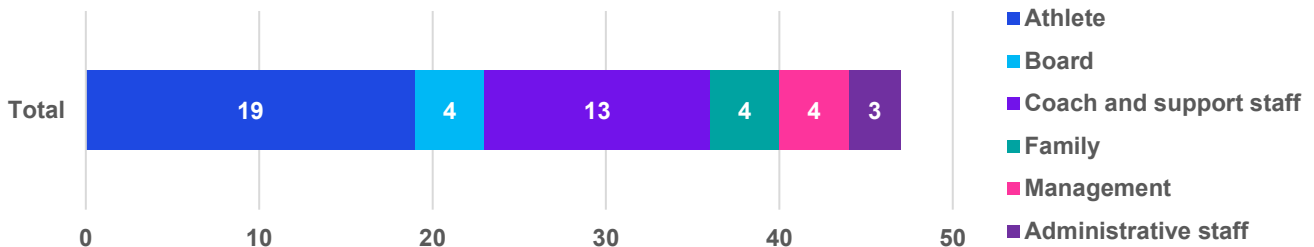
- athletes, including young people under 18 years of age
- families of athletes including parents and guardians
- coaches and support staff including head coaches, all other coaches, physical preparation specialist, performance science, movement specialist, athlete wellbeing and engagement staff, psychologists, physiotherapists and dietitians.
- administrative staff including PET Coordinator and Performance Services Program Manager Staff
- management including the Senior Leadership Team
- WAIS Board members.

Number of interviews and focus groups

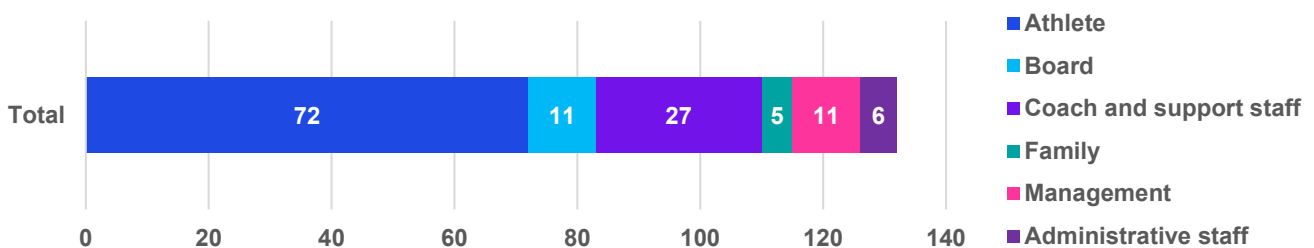
30 interviews and 17 focus groups were conducted, engaging a total of 132 participants. The graph below documents the number of participants by interview or focus group. One interview had two participants.



Count of interview and focus group by respondent group



Count of interview and focus group participants by respondent group



6.2 Detailed outcomes

Participants of interviews and focus groups were asked consistent and structured questions aligned to the Review Framework to understand their perspectives, experiences and insights into athlete safeguarding, culture and governance. Participation in focus groups and interviews was voluntary and information shared by participants was captured in a de-identified and anonymous manner.

Outlined below is a summary of the observations drawn from interviews and focus groups across all respondent groups.

6.2.1 Leadership and governance

Participants were asked if staff role model athlete safeguarding and if they perceive WAIS coaches, support staff, management, including Senior Leadership Team and the WAIS Board, as exemplifying athlete safeguarding behaviours. Additionally, participants were asked if WAIS staff were committed to ensuring athlete safety and asked to describe the culture in relation to safeguarding.

Key observations:

- Most athletes described how coaches and support staff role modelled acceptable behaviours at WAIS. However, some athletes described how historically coaches did not always role model acceptable behaviours.
- Some athletes spoke about how WAIS staff, particularly coaches and management, indicated that funding allocations impacted decision making which affected their overall experience and at times deprioritised athlete safeguarding in order to reach performance outcomes.
- Most coaches and support staff described how role modelling comes from those who are actively engaged with athletes daily such as coaches and support staff. However, most family members consulted with stated that coaches did not role model how to be safe at WAIS.
- Some coaches and support staff stated they were unfamiliar with the current WAIS Board at the time of the Review. One staff member advised that staff 'don't really interact with the Board [and] it would be difficult to see role modelling of athlete safety.'
- Management and the WAIS Board agreed that 'athlete care and safety' has been a key consideration in strategic planning discussions. Management and the WAIS Board advised that they are all accountable in ensuring athletes are free from abuse and harm. The current WAIS Board described how bolstering reporting mechanisms will be a priority area for WAIS going forward.
- Management and the WAIS Board acknowledged the elite sport environment in which WAIS operates within and that it is not unreasonable to focus on performance outcomes. Management and the WAIS Board noted that WAIS' funding does not correlate with performance, however, performance reviews of staff are based on medals won, performance outcomes and results. Members of management and the WAIS Board described how NSO's set additional expectations for athletes, noting that athletes operate under jurisdictions outside of WAIS.
- When discussing how safeguarding was considered within the strategic agenda, some coaches and support staff described how athlete safety metrics and targets are not incorporated into staff performance reviews.

See Finding 5.1.2 and 5.2.1 for more detail.

6.2.2 Policies and procedures

Participants were asked if they were aware of the WAIS policies or documents which relate to athlete safeguarding, if they felt acceptable and unacceptable behaviours were clearly documented, and if the expectations for athlete safeguarding were clear.

Key observations:

- Most scholarship athletes agreed policies and procedures regarding athlete safety existed and they were aware of them. However, most athletes on training agreements consulted with agreed they were not aware of athlete safeguarding policies and procedures.
- Some family members interviewed agreed that policies existed however raised concerns regarding the consistency of policies and the lack of leadership adherence to organisational policies and processes.

- All coaches and support staff agreed they had access to policies and that they were required to undertake a formal assessment to consolidate their understanding of WAIS policies once a year. Some staff interviewed described this assessment as a 'box ticking exercise', with some staff describing the lack of practicality of policies.
- Most WAIS staff interviewed described how historically policies were not updated often, had poor version control, policies were long and difficult to understand and that sometimes policies contradicted themselves. Some coaches and support staff agreed that 'procedures might be up to interpretation.'
- Management agreed awareness of athlete safety across the organisation was good however stated policies could be clearer, more succinct and better aligned.
- When discussing policies and procedures, most athletes, coaches and support staff agreed that those who are impacted by key policies and procedures, raised that they were not consulted with or engaged during the policy design or implementation process.

See Finding 5.2.3 for more detail.

6.2.3 Roles and responsibilities

Participants were asked about their understanding of their responsibilities under WAIS policies, who they believe holds ultimate accountability for athlete safeguarding and their understanding of their responsibilities as it relates to reporting and escalating athlete safeguarding incidents and complaints.

Key observations:

- Most coaches and support staff agreed athlete safeguarding was everybody's responsibility.
- Some coaches and support staff agreed that they didn't know who was in charge of making the final decisions for issues involving athletes and who was ultimately accountable. Some coaches and support staff state the Board was ultimately accountable whilst others said the CEO.
- Some coaches and support staff noted the role, as it relates to athlete safeguarding, of the Senior Leadership Team and Board were not defined. One staff member noted, historically, the roles and duties of the CEO and the Board were not as defined nor separated as they should be.
- Management stated the Senior Leadership Team are responsible for process implementation and the Board is responsible for setting the policy frameworks.
- Current WAIS Board members stated that everyone is responsible for athlete safeguarding at WAIS. They shared that accountability sits with the CEO and the Senior Leadership Team and the Board are responsible.
- Former WAIS Board members were unable to clearly define their responsibilities regarding the oversight of athlete safeguarding. There appeared to be a misconception among some members that athlete-facing staff solely bore the responsibility for maintaining safeguarding. There was a lack of understanding about the Board's role in establishing and ensuring a safe environment.

See Finding 5.2.2 for more detail.

6.2.4 Education

Participants were asked if they have access to education, information or training relating to how to foster a safe environment at WAIS and how confident they were in identifying safe and unsafe behaviours.

- Most scholarship athletes stated they had undertaken an induction program to learn about athlete safeguarding, which included reviewing policies and undertaking a formal assessment, upon their commencement with WAIS and annually thereafter.
- All training agreement athletes confirmed that they do not receive policies or a formal induction upon their commencement at WAIS, with most athletes advising that they learn about acceptable and unacceptable behaviours through life experience.
- Athletes agreed that they were bound by the Athlete Code of Conduct which outlined acceptable and unacceptable behaviours of athletes. Current athletes indicated that, while coaches and support staff provided education on acceptable and unacceptable behaviours from a staff perspective, there were still some grey areas that remained unclear.

- Most family members interviewed stated they did not receive education, information or training relating to athlete safeguarding. Some coaches and support staff recommended delivering further training on athlete safeguarding, policies and expectations to parents, including parents of younger athletes.
- All coaches and support staff confirmed that they were required to undertake an induction program upon their commencement at WAIS, however, some staff expressed that the induction was general in nature and not specific to athlete safeguarding. Most coaches and support staff agreed that ad hoc safeguarding training was provided throughout the year.
- Most coaches and support staff confirmed that they were bound by a code of conduct, with some staff stating that this document outlined acceptable and unacceptable behaviours.

See Finding 5.4.1 and 5.4.3 for more detail.

6.2.5 Raising concerns and complaints

Participants were asked about what they would do if they felt unsafe, or were concerned for another person's safety, at WAIS, and if they received guidance from WAIS on how to raise concerns or complaints about athlete safety. Instances where participants raised concerns or complaints, as well as barriers preventing them from doing so, were explored.

Key observations:

- Most current athletes advised that they have not needed to or wanted to raise a complaint whilst at WAIS. Most athletes noted that if they were feeling unsafe at WAIS they would speak to their teammates, their coach, a support staff member or their family.
- Most athletes did not know of a formal complaint process or who they could raise complaints with.
- Some athletes spoke about barriers to raising a complaint. Barriers included jeopardising their relationships with coaches, their selection for competition or their scholarship, exclusion from the program or team and concerns regarding conflict of interest, privacy and confidentiality.
- Some athletes recommended improvements to the complaint handling process, emphasising the need for clearer information about contact points, confidentiality, and assurance that complainants will not face retribution.
- Most athletes, families, coaches and support staff agreed that multiple avenues to raise complaints did not exist. Most family members consulted with did not have confidence in the complaint management system at WAIS. Most family members feared retribution and were concerned about conflict of interest including the lack of independence when investigating matters. One family member said there is a 'vindictive side of leadership' when asked why they were afraid to raise complaints.
- Most coaches and support staff spoke about the historical culture at WAIS, where athletes felt intimidated by coaches, and there was a prevalent concern among staff that voicing issues could lead to retribution.
- Some coaches and support staff described how there are perceived barriers for athletes and/or staff when raising a complaint, for example, stakeholders may be concerned about retribution. Some staff described how athletes may be concerned about their scholarship tenure if they raised a concern, whilst some staff described concerns related to program funding cuts associated with complaints.
- Some coaches and support staff raised concerns regarding conflict of interest, privacy and confidentiality particularly when raising a complaint. Management agreed the process to raise, investigate and manage complaints or concerns was undergoing change. Management agreed the process to manage critical incidents does not exist but is being developed.
- Management and the WAIS Board confirmed complaints which posed reputational risk for WAIS were escalated to the attention of the Board noting this occurred on an ad hoc basis. Members of the WAIS Board agreed that there is minimal data or trend analysis of safeguarding data, such as complaints or incidents, to inform continuous improvement. The current Board stated reporting avenues as well as receiving high quality reports will be a priority area going forward.

See Finding 5.3.2 and 5.3.3 for more detail.

6.2.6 WAIS' response to concerns, complaints and incidents

Participants were asked what WAIS' response was if they had previously raised concerns or complaints related to athlete safeguarding, if they thought appropriate action had or would be taken and if people were held and are being held accountable for their actions at WAIS.

Key observations:

- Most athletes were unaware of the complaint process and the potential outcomes or responses that would follow a filed complaint.
- Athletes consulted with who had raised concerns or complaints at WAIS, felt dissatisfied with the response of WAIS and lack of investigation, resolution or outcome.
- Most family members interviewed stated there was a lack of accountability and oversight to ensure that concerns and complaints were escalated, addressed, investigated, and resolved.
- Most coaches and support staff who had not raised a concern or complaint, felt appropriate action would be taken as policies and procedures existed. Some coaches and support staff said they were not confident in WAIS' ability to handle complaints.
- Most coaches and support staff who had raised concerns at WAIS stated that confidentiality was not upheld and provided mixed responses on whether those colleagues were subsequently held accountable for their actions.
- Athletes, families and staff, who had made historical complaints, agreed that all issues and matters were directed to and managed by a member of the Senior Leadership Team, without any established protocol for lodging complaints against the Senior Leadership Team. It was shared through focus groups that the same member who dealt with the complaints also had exclusive control over the information regarding those complaints. Some athletes, coaches and support staff noted incidents or concerns were not raised with authorities and shared that child abuse including child sexual abuse was not responded to.
- Coaches and support staff may have been unaware of their reporting obligations, as relevant staff never discussed mandatory reporting requirements, instead emphasising privacy over the duty to report incidents.
- Coaches, support staff and management reported the presence of inconsistent complaint and incident processes, with notable deficiencies in systems, data repositories, and documentation practices. The absence of robust record-keeping led to considerable variability in how cases were handled. Management indicated a propensity to address certain matters informally, stating they choose to deal with issues, deemed as 'smaller', by having private conversations rather than officially documenting the complaint, concern or incident.
- Members of the Senior Leadership Team agreed that incident management requires enhancement including clear incident categories and corresponding lines of escalation.

See Finding 5.3.3 and 5.3.4 for more detail.

6.2.7 Feeling safe and unsafe at WAIS

Athlete participants were asked what makes them feel safe at WAIS and if there had been times where they felt unsafe at WAIS.

Key observations:

- Most current athletes noted that they have not felt unsafe at WAIS, however, athletes discussed how training agreement athletes could feel unsafe due to the lack of protections under WAIS policies and the lack of education they undertake upon commencing at WAIS.
- Most current athletes, when asked what makes them feel safe at WAIS, shared that coaches and support staff, relationships with their peers, respecting boundaries, staff treating athletes as individuals irrespective of their performance and having clear communication would make them feel safe.
- Most current athletes, when asked what makes them feel unsafe or hypothetically unsafe at WAIS, stated practices that may endorse exclusion, lack of genuine athlete consultation and input, an athlete's holistic circumstances not being considered, staff being dismissive when concerns are raised, and private conversations being held in front of others would make them feel unsafe. Some athletes shared examples of feeling unsafe while at WAIS which included bullying, insults, verbal abuse, yelling, overtraining, unwanted attention and touching.

See Finding 5.1.1 for more detail.

6.2.8 Diversity and inclusion

Participants were questioned about whether staff consider athletes' diverse circumstances, such as abilities and background, and if both athletes and staff receive adequate support and education from WAIS to assist vulnerable athletes.

Key observations:

- Most athletes confirmed that their diverse circumstances, including their diverse abilities are taken into consideration by coaches and support staff. Most athletes noted that due to the nature of high performance sport, diverse groups may be underrepresented. The prevailing observation was that there is a lack of cultural diversity within WAIS, as the majority of individuals appear to share a similar background characterised by private education and the privileges associated with it.
- Athletes who identified as living with a disability advised that considerations regarding their diverse abilities may not have been factored into the formulation of training schedules. For example, one athlete who utilised a wheelchair for mobility purposes described being asked to complete squats by a support staff member. The athlete advised that once concerns were vocalised, the training schedule was adapted to their needs.
- Most coaches and support staff described how athletes' diverse circumstances are considered on a case-by-case basis. Most staff confirmed that they had not undertaken formal training on athlete diversity, athlete inclusion or cultural competency, they also advised that this is an area for improvement and that they could seek out resources if the situation arose where they required guidance. Additionally, when asked about vulnerability of athletes, most coaches and support staff couldn't articulate all types of vulnerabilities and instead focused on mental health.

See Finding 5.4.2 for more detail.

6.2.9 Athlete engagement and rights

Participants were asked about whether WAIS educates athletes on their rights and if athletes have been consulted in decisions affecting them.

Key observations:

- Most athletes stated that the Staff and Athlete Code of Conduct outlined acceptable and unacceptable behaviours. Many athletes focused on explaining what an athlete breach involved.
- Most athletes felt they were involved in decisions that affected their daily training environment, giving examples of WAIS making adjustments to training schedule depending on school, university or work commitments.
- Some athletes described needing to advocate on behalf of themselves to ensure programs are adapted to their needs, however, described how this may be challenging for junior athletes or athletes who have not engaged in this process before.
- Athletes discussed the idea of implementing an athlete advisory body to ensure their voice could be heard, they could be engaged as a representative body in decision making and could provide feedback and communicate with the Senior Leadership Team and WAIS Board. Additionally, athletes stated that a forum that offers an additional avenue for independent complaints raising, noting that junior athletes and training agreement athletes would benefit from raising concerns to a respected member of their cohort would be beneficial.
- In interviews and focus groups, the current WAIS Board confirmed that WAIS had approved the implementation of an athlete advisory body, which is that athletes could also support junior athletes have an additional avenue to raise feedback and complaints.
- Most coaches and support staff described how athletes are involved in performance planning and program development through yearly reviews. Some coaches noted that this was a 'box ticking' exercise rather than a genuine partnership or collaboration with the athlete.
- Most members of management stated athletes were made aware of their rights through an induction program. Members of management noted the importance of having athletes 'speak up' during goal setting meetings to ensure they are actively involved in decisions about their individual plans.

See Finding 5.4.1 for more detail.

6.2.10 Risk and compliance

Participants were asked what WAIS does to identify and manage risks. Additionally, participants were asked how WAIS is complying with its safeguarding legislative obligations.

Key observations:

- Some athletes identified risks to their safety but agreed this wasn't documented formally. For example, one athlete identified risks to their psychological safety, stating that the physical environment caused fear and anxiety, but after raising it with management agreed it was not documented formally. Additionally, it was noted that there was no process to raise risks, either emerging or known, and near misses.
- Most coaches and support staff noted if they identified a risk, they would raise it with someone in their chain of command. Most coaches and support staff agreed that risk identification relating to athlete safeguarding had improved in the five years preceding the Review. However, they explained this involved responding to an issue as it arose, and proactive risk management did not occur as there are no risk identification and escalation processes.
- Most members of management noted that currently no risk management processes exist. Management advised they had recently engaged a consultant and were working on improving risk management. Management stated a risk management framework was in draft but did not provide it until it was endorsed.
- Current WAIS Board members stated they have plans to review the risk management registers but this has not yet occurred.
- Most members of the management described how external WAIS facilities were hired from third parties. Members of the management noted that if they had concerns at a facility, such as members of the public accessing the environment, they would escalate this to the attention of the third party directly who would manage risks. Management noted no processes for identifying, documenting, and communicating risks present in the physical environment to the Board existed.
- WAIS Board members agreed that there was uncertainty concerning the extent of compliance-related information provided and escalated to the WAIS Board. Current WAIS Board members noted they plan to implement a compliance register and the Audit and Risk sub-committee will be accountable for reviewing the register and reporting outcomes to the Board.
- When discussing risk, some coaches and support staff raised concerns regarding the management of conflicts of interest at WAIS, noting they believe there are current conflicts of interest present at WAIS.
- Management and the WAIS Board agreed that there is no conflicts of interest policy or register, making it difficult to identify potential conflicts. Current WAIS Board members stated that Board conflicts of interest are now addressed during recruitment and managed by a register overseen by the Board's Chair.

See Finding 5.1.2 and 5.3.1 for more detail.

6.2.11 Culture

Participants were asked to describe the culture as it relates to athlete safeguarding at WAIS.

Key observations:

- Some athletes highlighted how there is an emphasis on results, even if only perceived emphasis, is deeply ingrained in the culture, where securing funding and program stability hinge on achieving success.
- Some athletes expressed feeling compelled to prioritise their sport and performance over their own safety due to a culture of prioritising results.
- Most family members interviewed stated there was a lack of safeguarding culture. One family member said the culture was 'dangerously toxic.'
- Most coaches, support staff and management stated the safeguarding culture at WAIS has undergone improvement, explaining staff are increasingly aware of safeguarding concerns and issues. Some coaches and support staff described the culture felt uncertain and tense as WAIS was going through a lot of change.
- Most coaches and support staff believed that the culture within their individual sport programs was good and prioritised athlete safeguarding.

- Some coaches and support staff stated the notion that failure to win medals could lead to funding cuts or program termination was frequently cited as a coercive tactic to drive performance, thereby creating a barrier for staff and athletes to voice concerns about safety or wellbeing.
- Most current WAIS Board members stated that historically a defensive culture existed, noting they want this to change and improve.
- Most current WAIS Board members stated that a power imbalance between athletes and coaches, and coaches and Senior Leadership Team exists and therefore as a Board they want a culture where people feel safe to raise concerns.

See Finding 5.1.2 and 5.1.3 for more detail.

Section 7:

Detailed survey outcomes

7.1 Overview of participants

A total of 119 participants responded to three surveys.

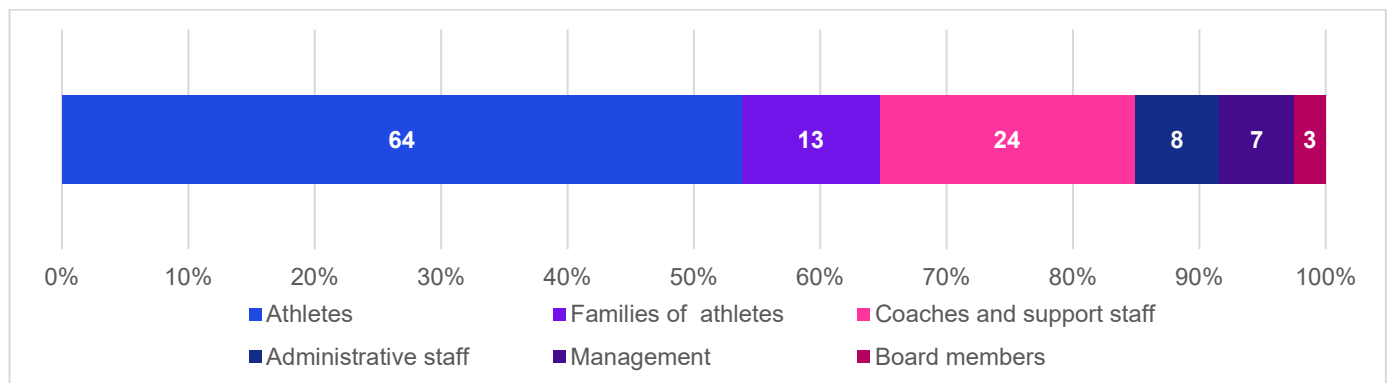
Surveys were conducted for the corresponding respondent groups:

1. Athletes and families of athletes, including:
 - athletes this includes young people under 18 years of age but over the aged of 16 years old
 - families of athletes including parents and guardians.
2. Coaches and support staff, including:
 - coaches and support staff including head coaches, all other coaches, physical preparation specialist, performance science, movement specialist, athlete wellbeing and engagement staff, psychologists, physiotherapists, and dietitians.
3. Administrative staff, management and the WAIS Board, including:
 - administrative staff
 - management including the Senior Leadership Team
 - WAIS Board members.

Please note that the respondents received a tailored set of questions corresponding to their roles at WAIS. Consequently, the questionnaires differed, and not all participants answered the same questions.

Summarised below is a breakdown of survey respondents.

Total respondents by respondent group



7.2 Detailed survey outcomes

7.2.1 Athletes and families of athletes survey results

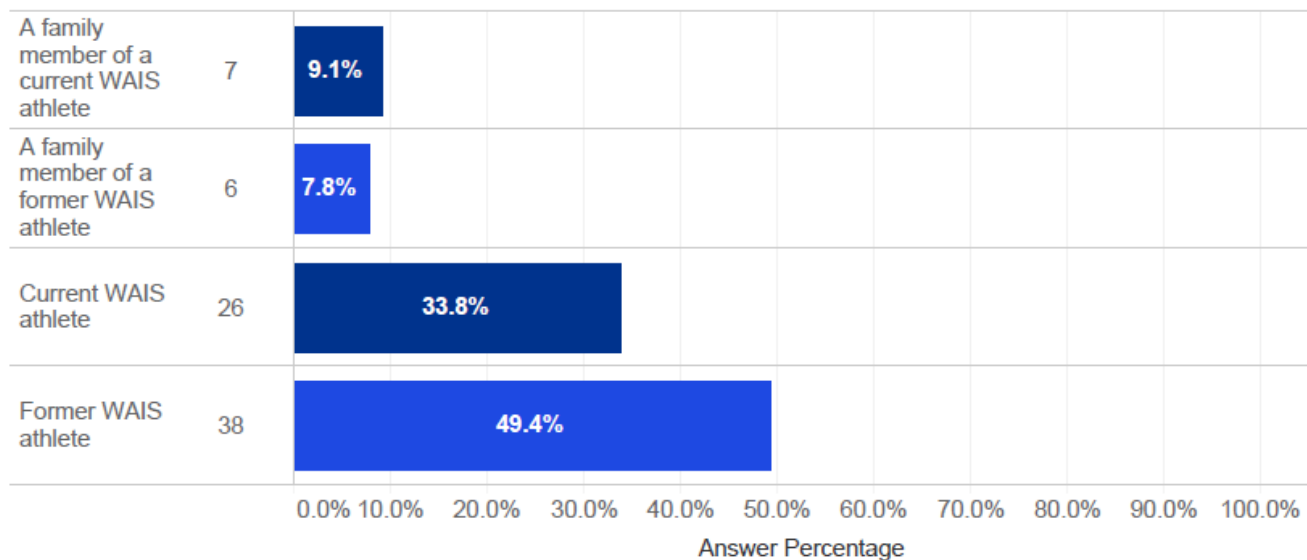
Current and former WAIS athletes and their family members involved with WAIS during the Review period were eligible to complete a survey.

Questions and results are documented below.

7.2.1.1 What is your involvement with WAIS, pick the option which is most relevant to you.

Participants were asked to outline whether they were a current or former athlete, or family member of a current or former athlete to ensure that the survey question set was customised to the relevant cohort.

Count of respondents:



7.2.1.2 What year did you last participate in a WAIS program?

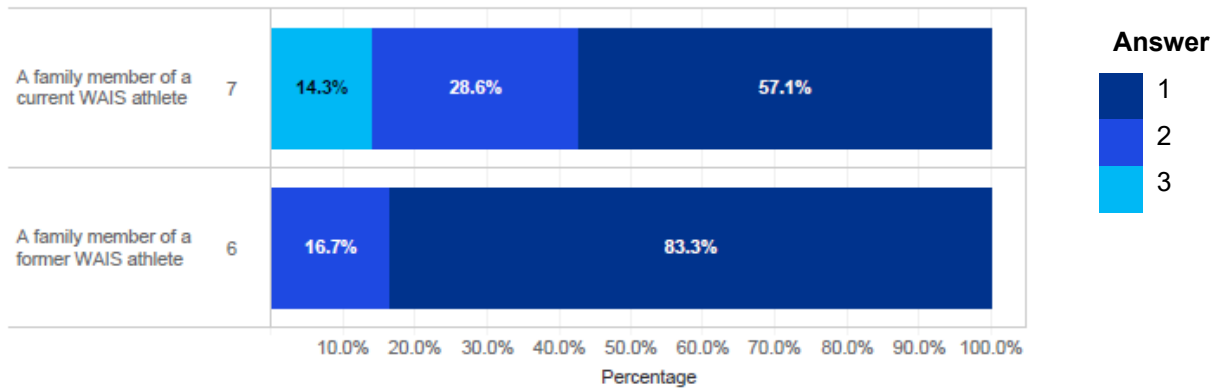
The survey was only to be completed by participants who were involved with WAIS within the last 5 years (the Review period). Those who selected a date and time prior to April 2019 did not complete the survey.

7.2.1.3 What is your relationship with the athlete(s)?

This survey question was posed to families of athletes only. All 13 family members responded that they were a parent or guardian.

7.2.1.4 How many of your family members have attended WAIS?

Responses by participant group:

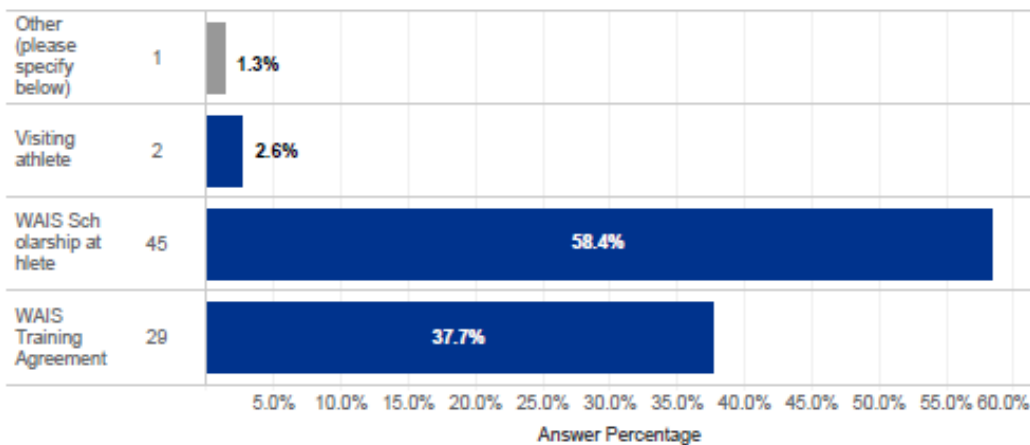


Note: This survey question was posed to families of athletes only.

7.2.1.5 Choose the option that best describes your relationship with WAIS.

Respondents were asked to select if they were, or their family member was, a WAIS Training Agreement athlete, WAIS Scholarship athlete or a visiting athlete.

Count of respondents:

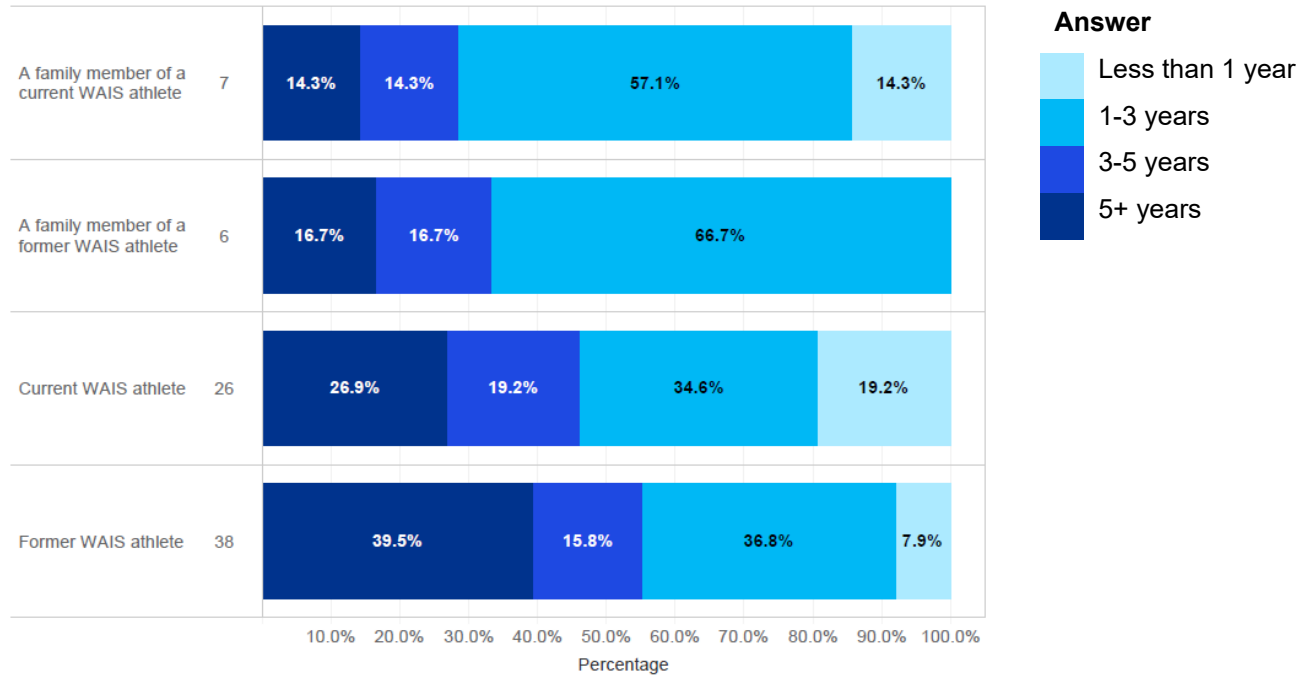


The respondent who selected other noted:

- WA Connect Grant Athlete.

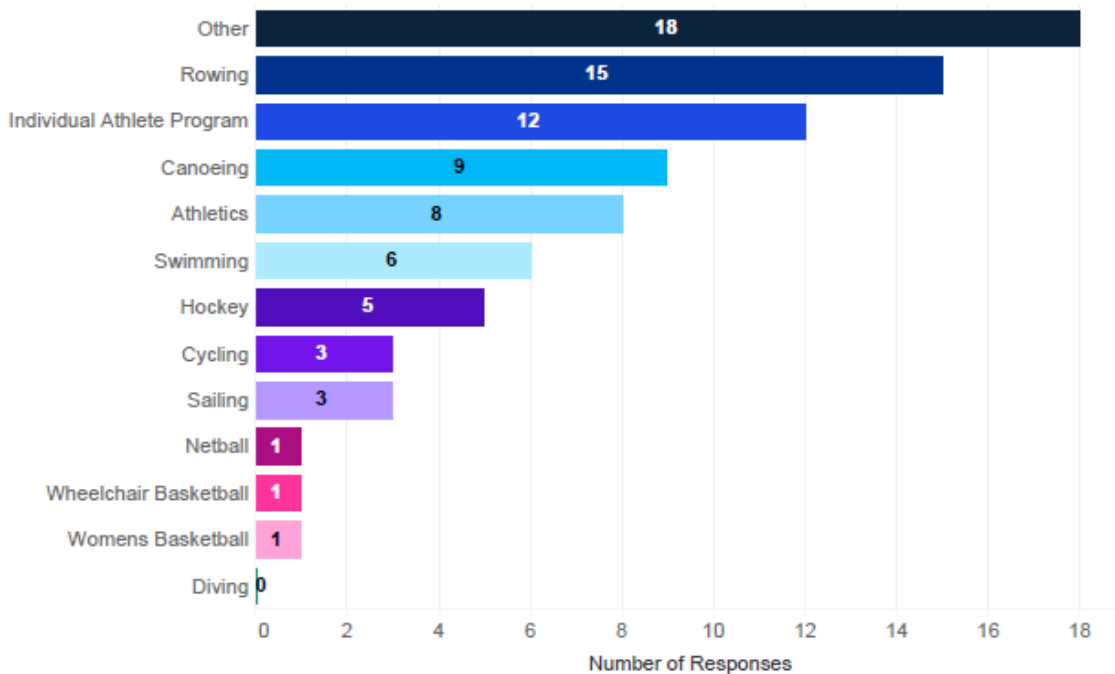
7.2.1.6 How long were you or your family member(s) an athlete at WAIS?

Responses by participant group:



7.2.1.7 What program did you or your family member(s) participate in?

Count of respondents:



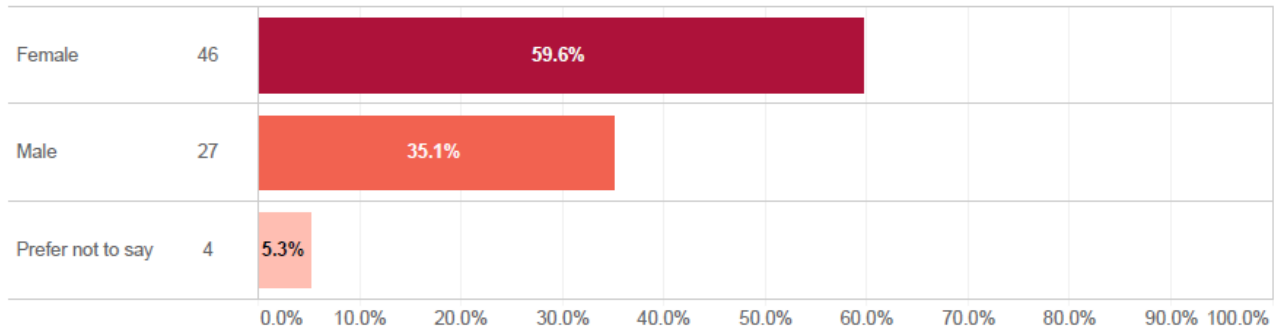
Note: family members were able to select multiple options for multiple family members.

The respondents who selected other were from the following programs:

- 16 respondents noted water polo.
- 2 respondents named additional sports which have not been disclosed to protect the anonymity of these participants.

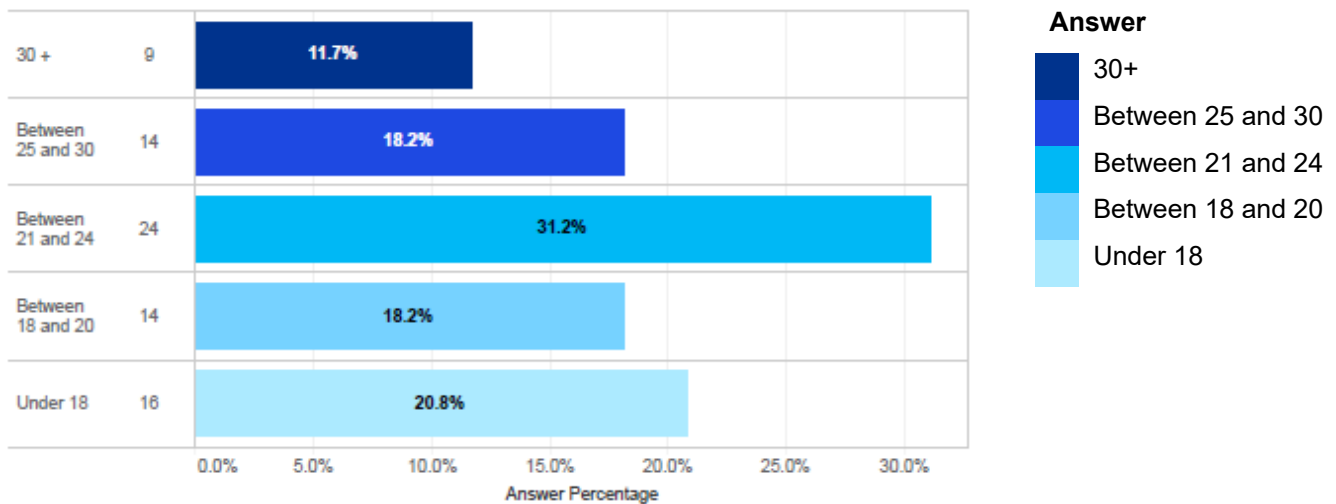
7.2.1.8 Please select the option which most closely reflects how you or your family member(s) identify.

Count of respondents:



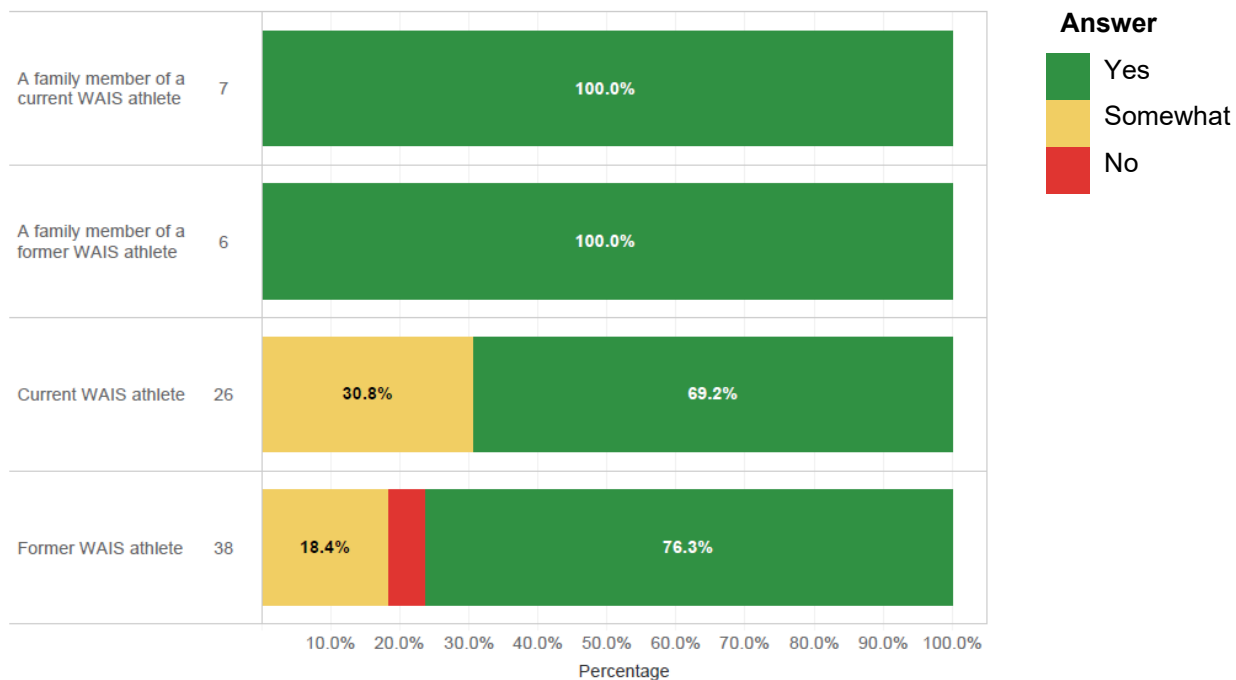
7.2.1.9 How old are you or your family member?

Count of respondents:



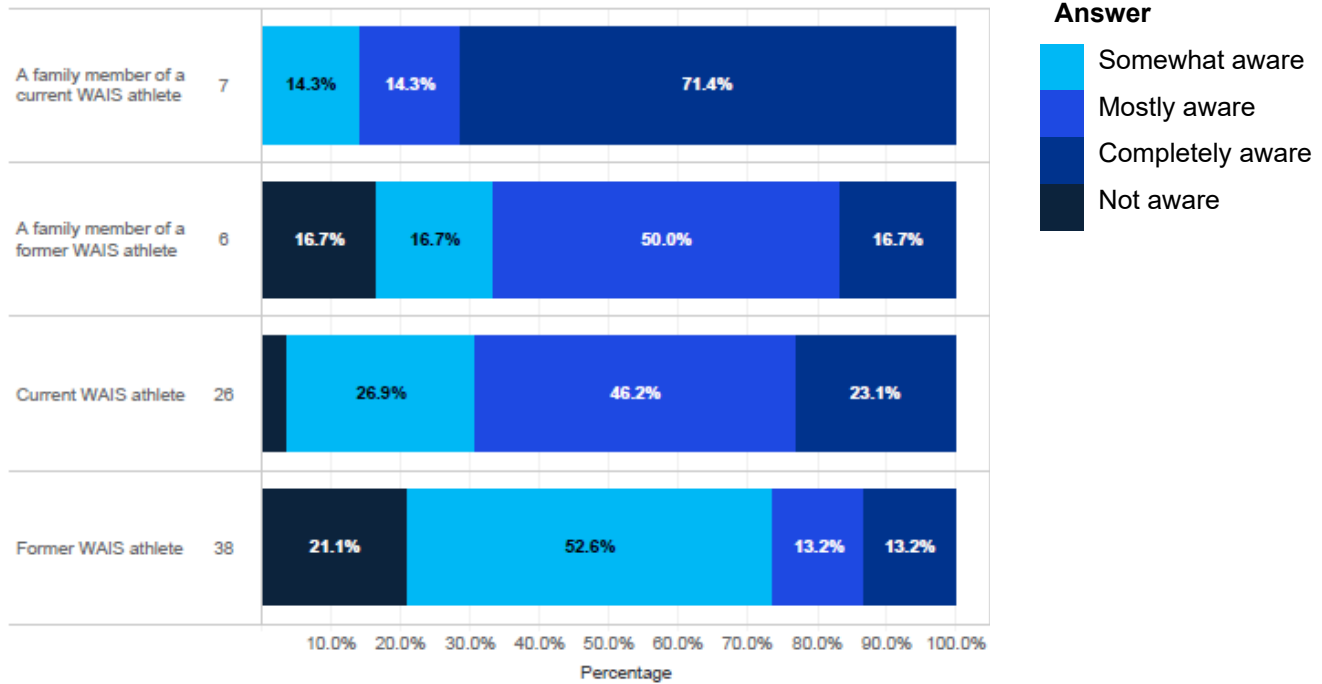
7.2.1.10 Do you understand what the term ‘athlete safety’ means?

Responses by participant group:



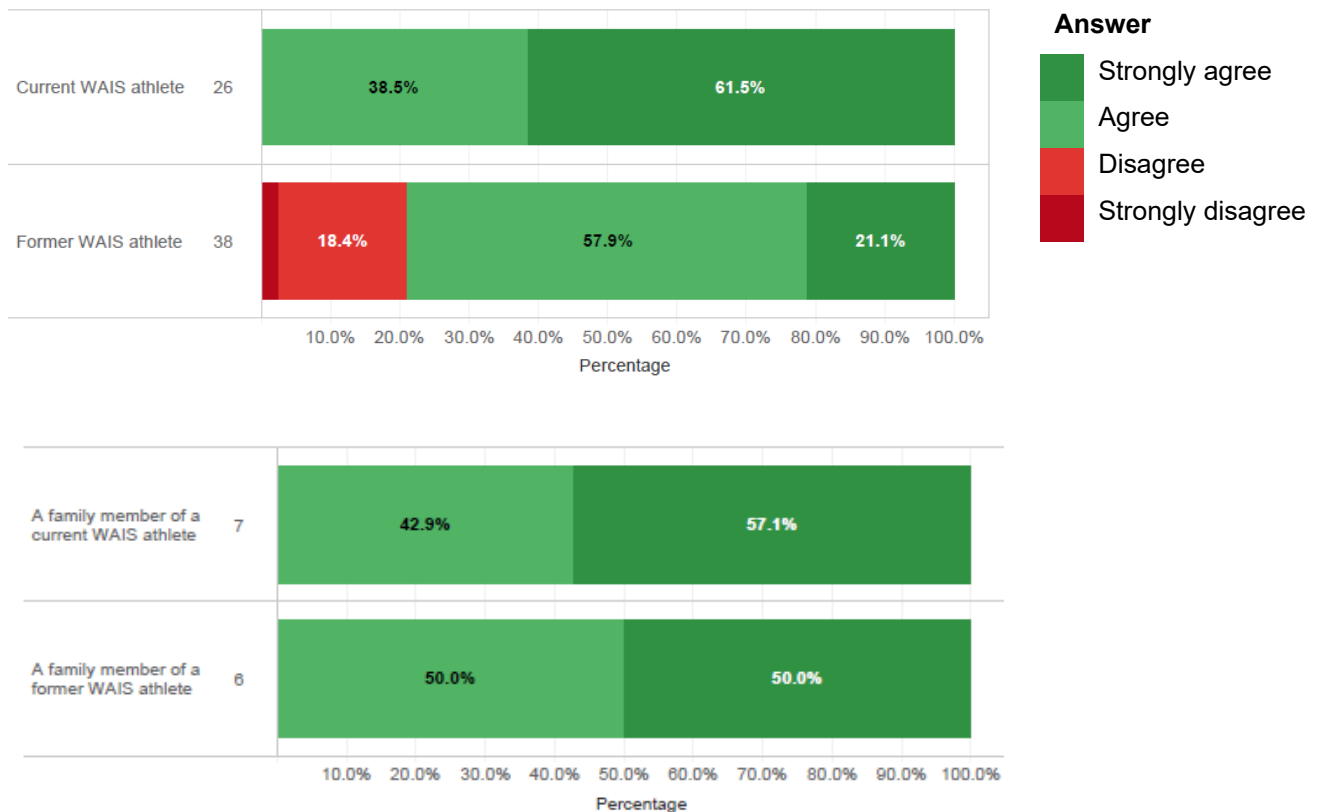
7.2.1.11 When you or your family member(s) were at WAIS, did you understand your or their rights when it came to safety and wellbeing?

Responses by participant group:



7.2.1.12 I understand what safe and unsafe behaviours are.

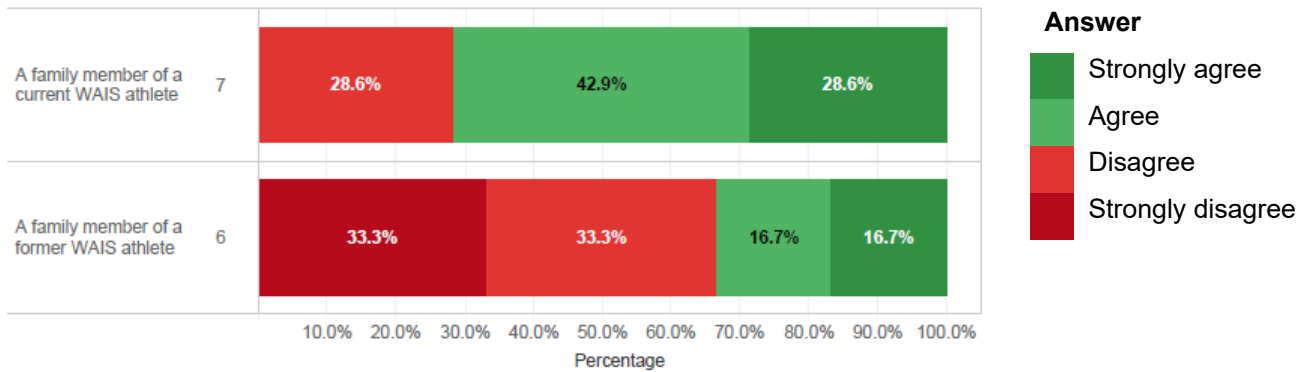
Responses by participant group:



Note: Families of athletes were asked to answer on behalf of their family member.

7.2.1.13 WAIS informed me of what is considered safe and unsafe behaviour.

Responses by participant group:



Note: This question was posed to families of athletes only.

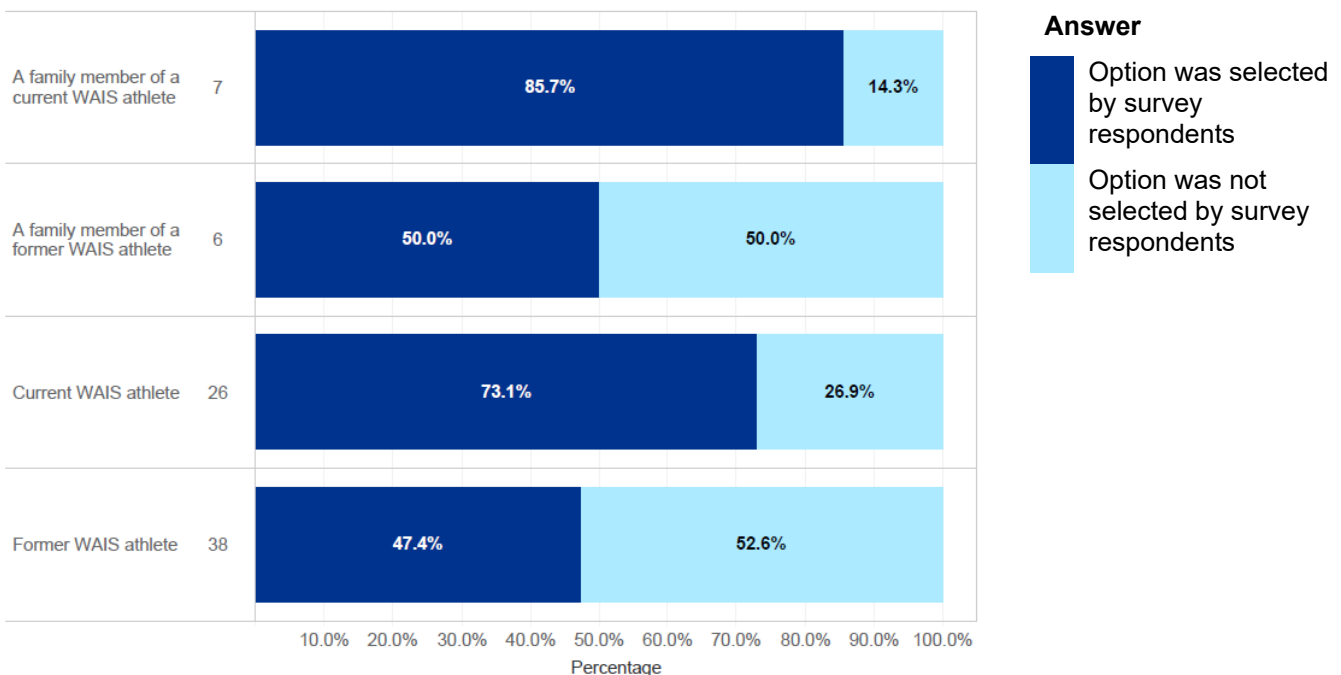
7.2.1.14 I was made aware of what unsafe behaviours are through the following.

Respondents were able to select multiple options from the following list, results documented below.

- Informed by WAIS policies and procedures
- Informed by posters
- Informed by training/guidance
- Informed by staff
- Other
- I have not been informed of athlete safety.

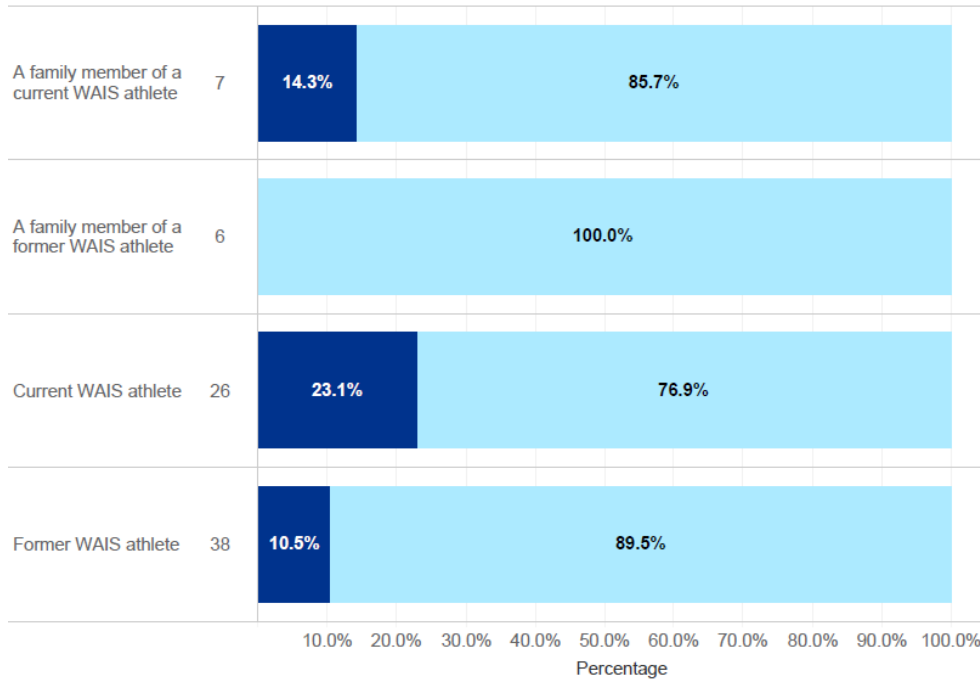
Informed by WAIS policies and procedures

Responses by participant group:



Informed by posters

Responses by participant group:

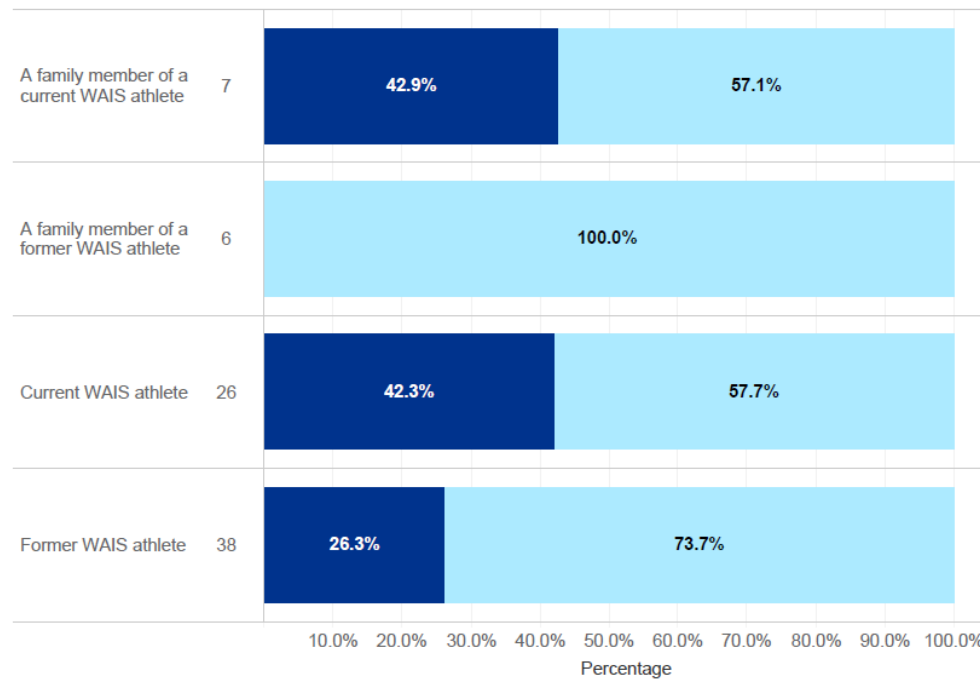


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Informed by training/guidance

Responses by participant group:

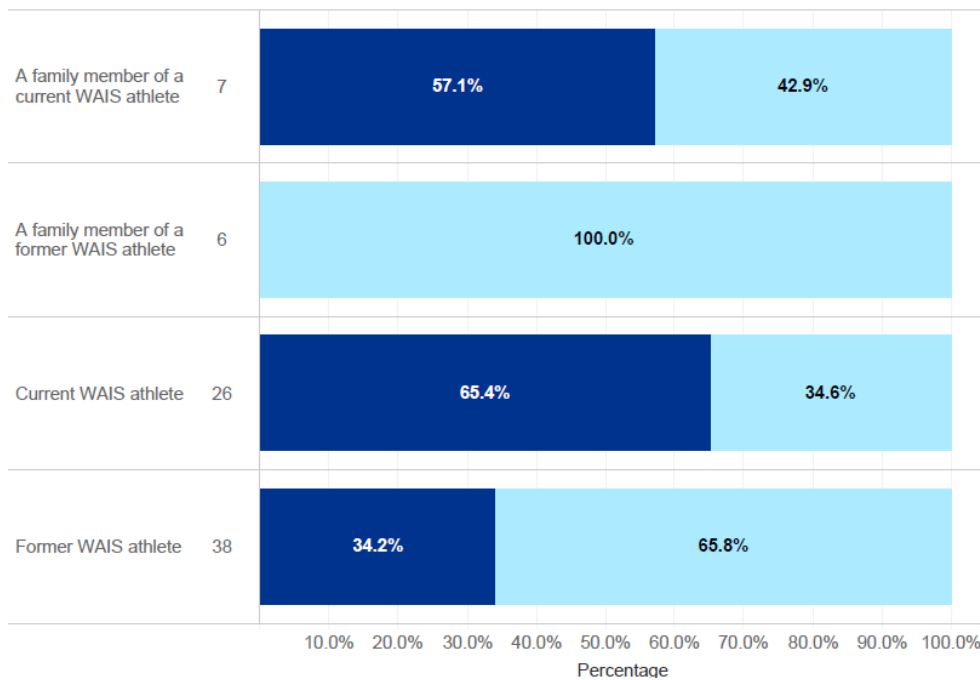


Answer

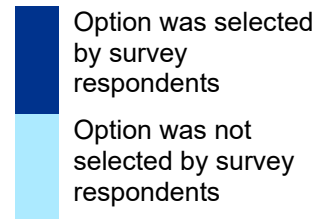
- Option was selected by survey respondents
- Option was not selected by survey respondents

Informed by WAIS staff

Responses by participant group:



Answer



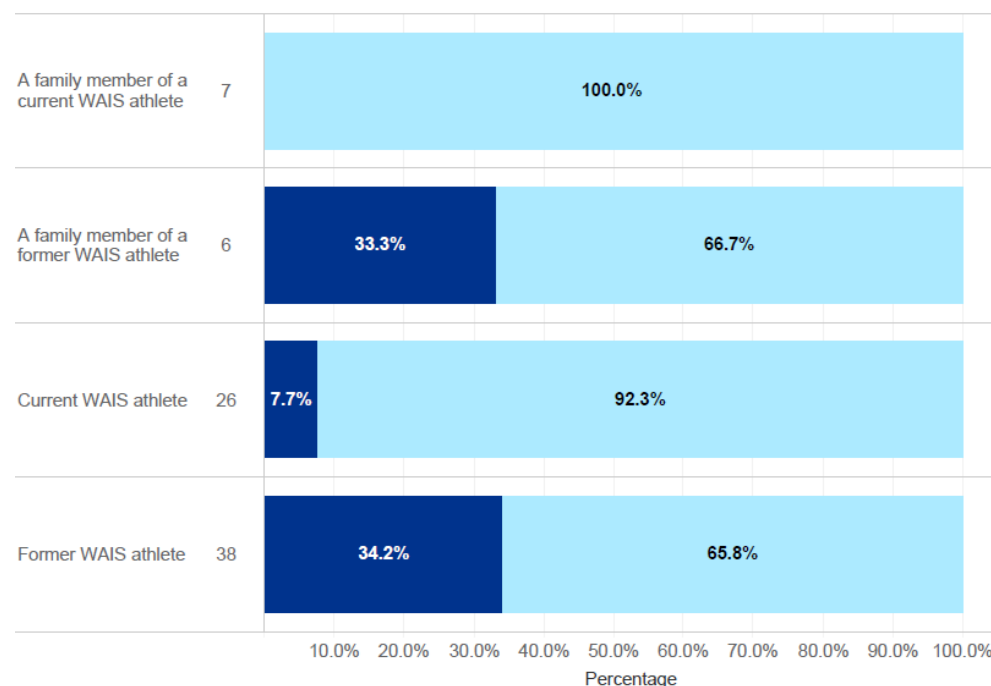
Other

Four respondents indicated that they received information through a medium 'other' than the prepopulated options presented. Of these respondents:

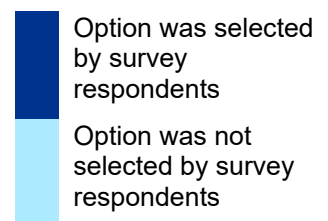
- One participant advised that they receive information through NSO's, Australian Institute of Sport and Australian Human Rights Commission (AHRC)
- One participant advised that they receive information from government agencies.
- One participant stated that they receive information by speaking to family and friends.
- One participant stated that they received information through their educational background, as a teacher.

Respondents felt they were not informed about athlete safety

Responses by participant group:

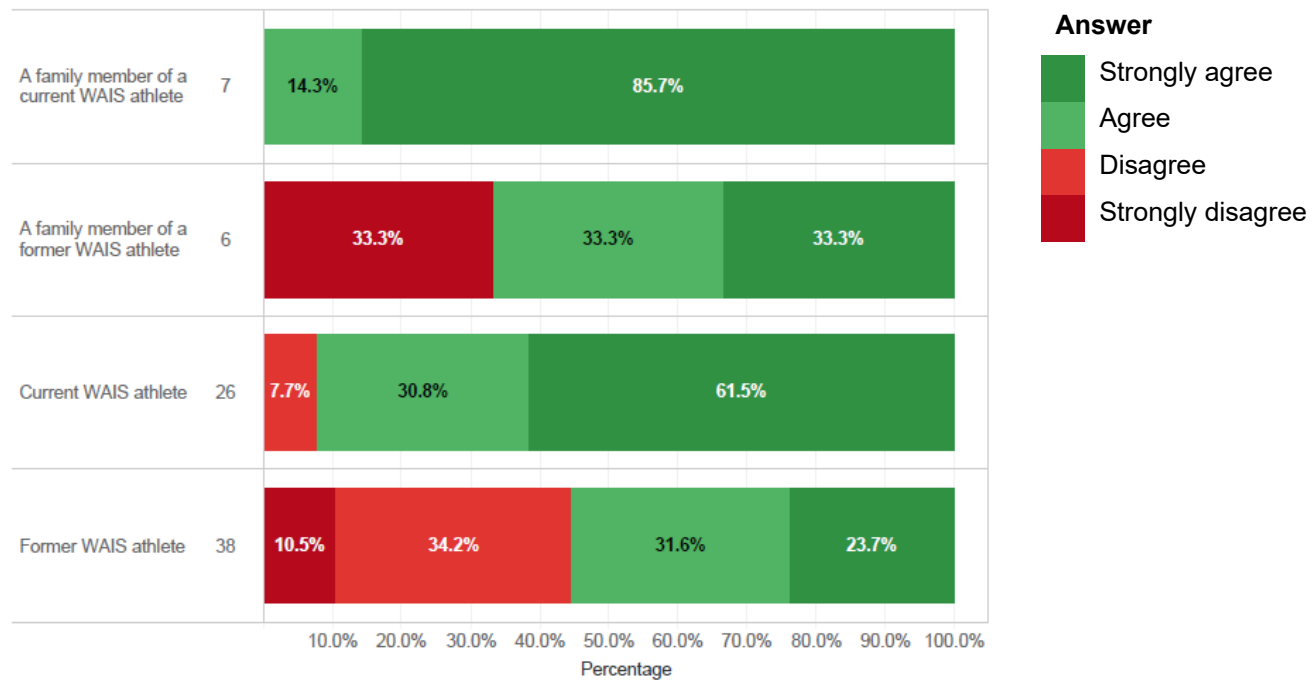


Answer



7.2.1.15 In general, I feel that coaches and WAIS staff care about my or my family member’s wellbeing and safety.

Responses by participant group:



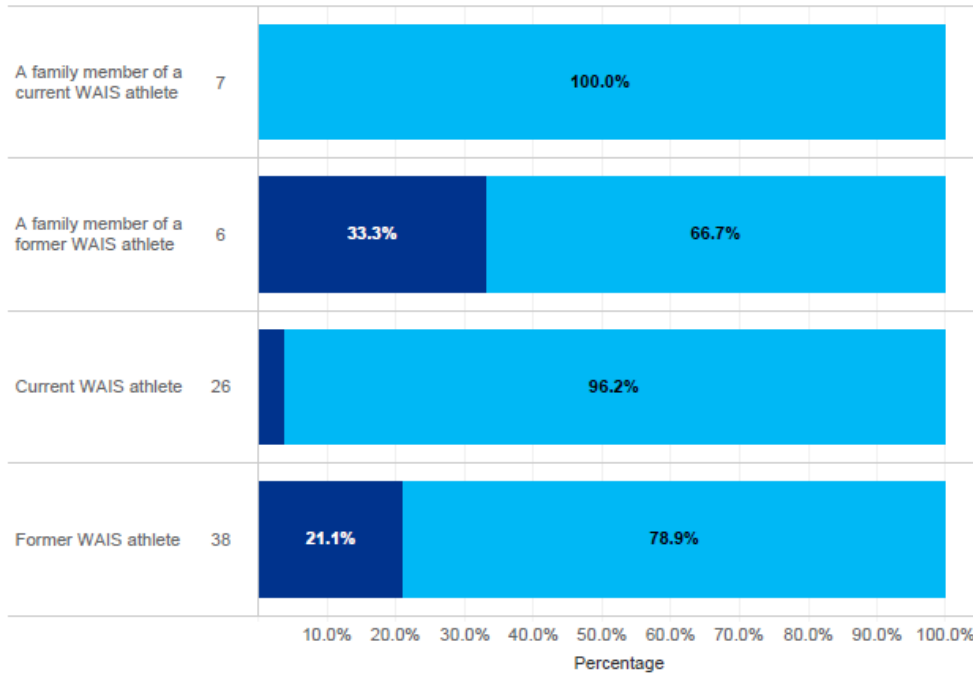
7.2.1.16 Have you, or your family member, ever felt unsafe because of any of the following?

Respondents were asked to select all that apply from the following options, results documented below.

- I felt they were bullied
- I felt they were harassed
- I felt they were body/weight shamed
- I felt they were threatened physically
- I felt they were threatened emotionally
- I felt they might injury themselves
- I felt they were forced to overtrain
- I felt they were being forced to train with injuries
- They were given physical punishments
- I felt they would be punished if they did not meet their coach’s expectations
- I felt they were uncomfortable around a WAIS staff member
- I felt uncomfortable around medical staff
- I felt they were uncomfortable around another athlete
- I felt they were uncomfortable around another a parent or spectator
- I felt they were getting unwanted attention
- I felt they were getting inappropriate attention
- I felt they were inappropriately touched
- I felt they were having an inappropriate relationship with someone who wanted something from them
- I felt they were isolated from the world outside their sport
- Other
- I don’t feel like athletes were unsafe at WAIS.

Respondents felt bullied

Responses by participant group:

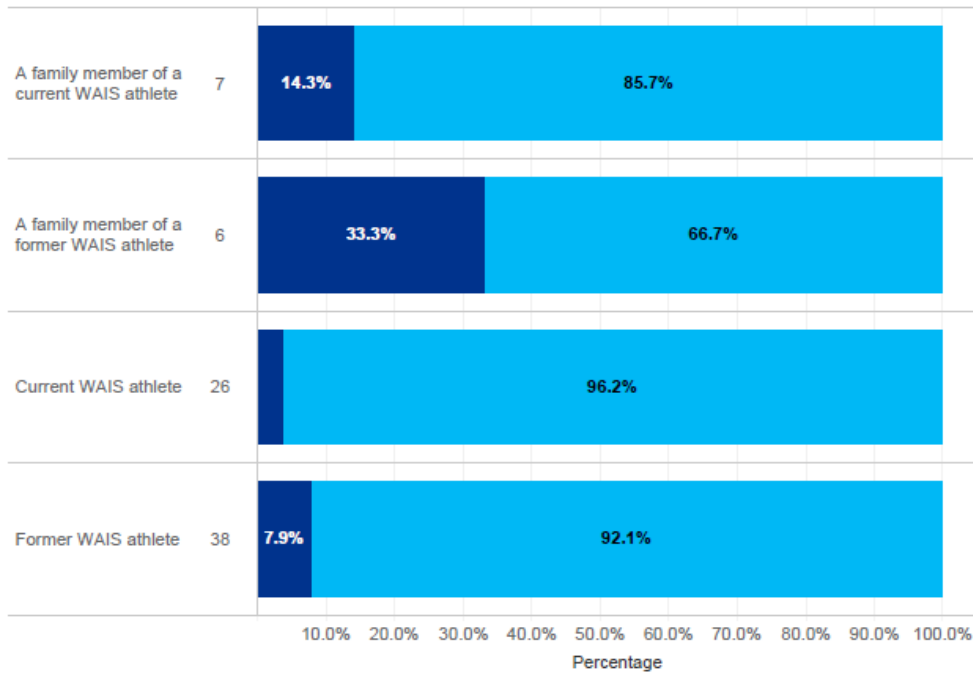


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt harassed

Responses by participant group:

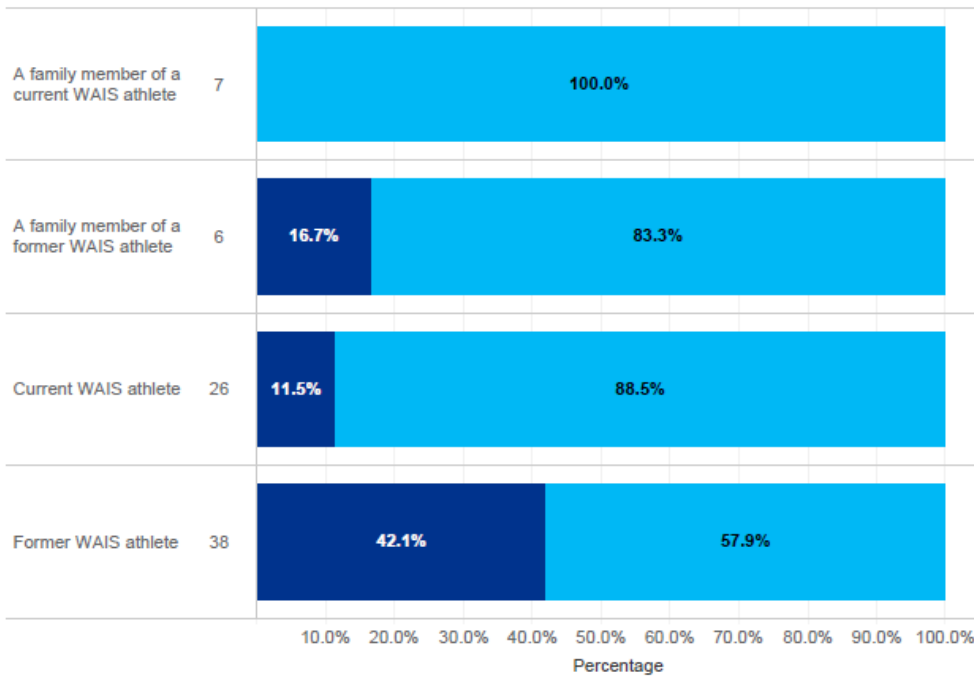


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt body / weight shamed

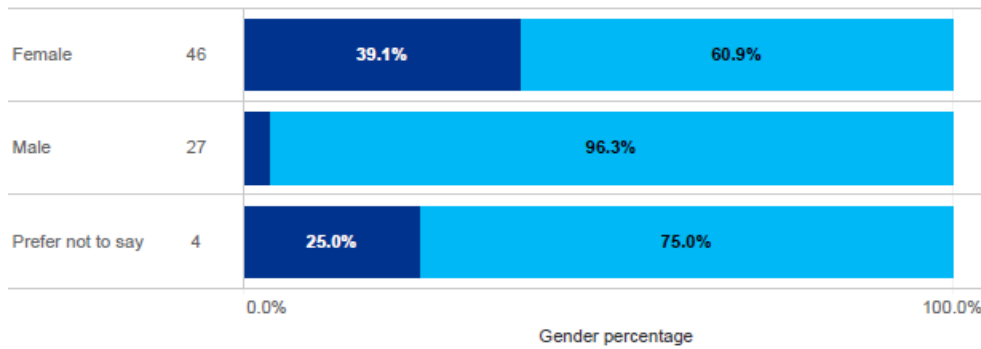
Responses by participant group:



Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Responses by gender:

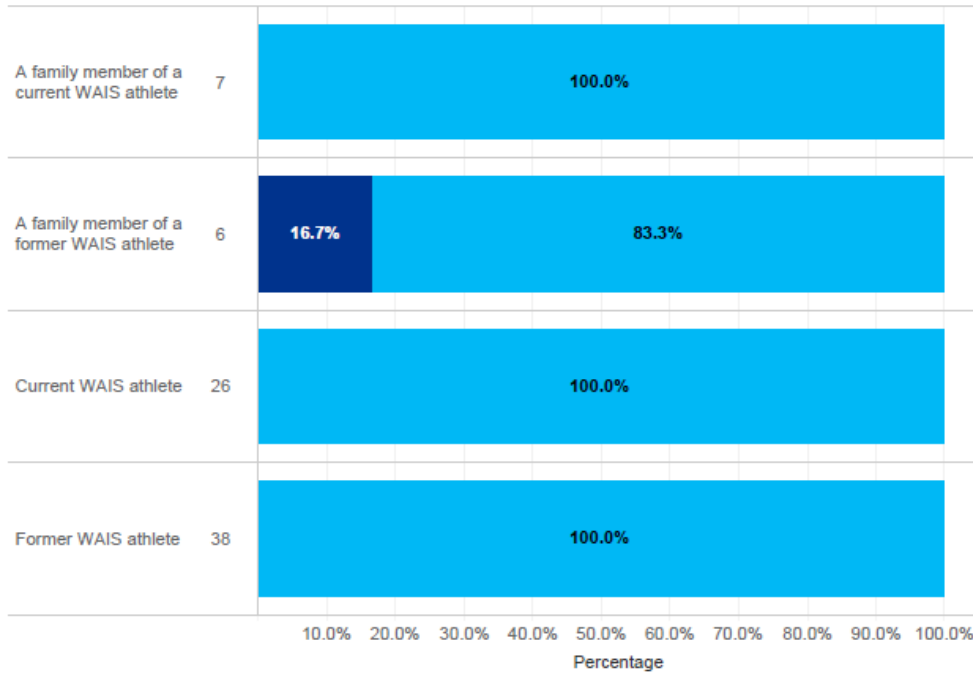


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt threatened physically

Responses by participant group:

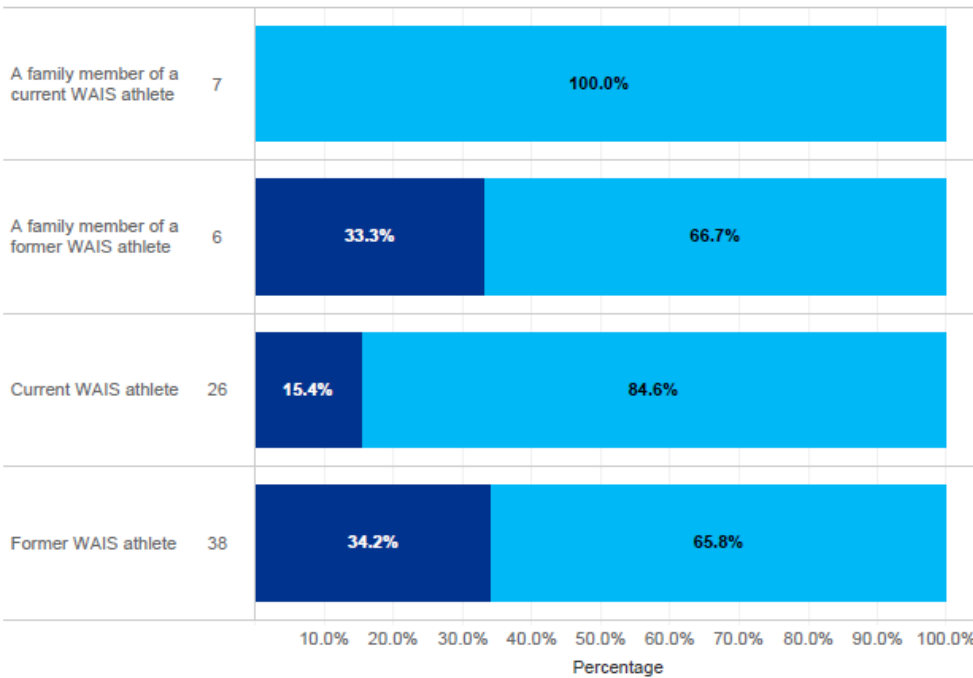


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt threatened emotionally

Responses by participant group:

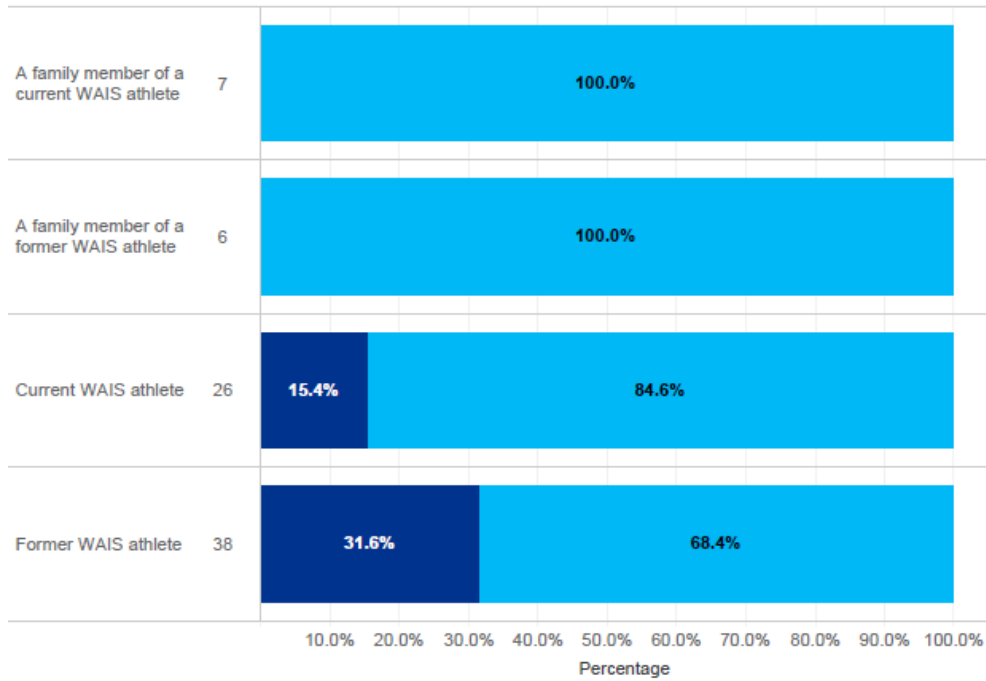


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they might injure themselves

Responses by participant group:

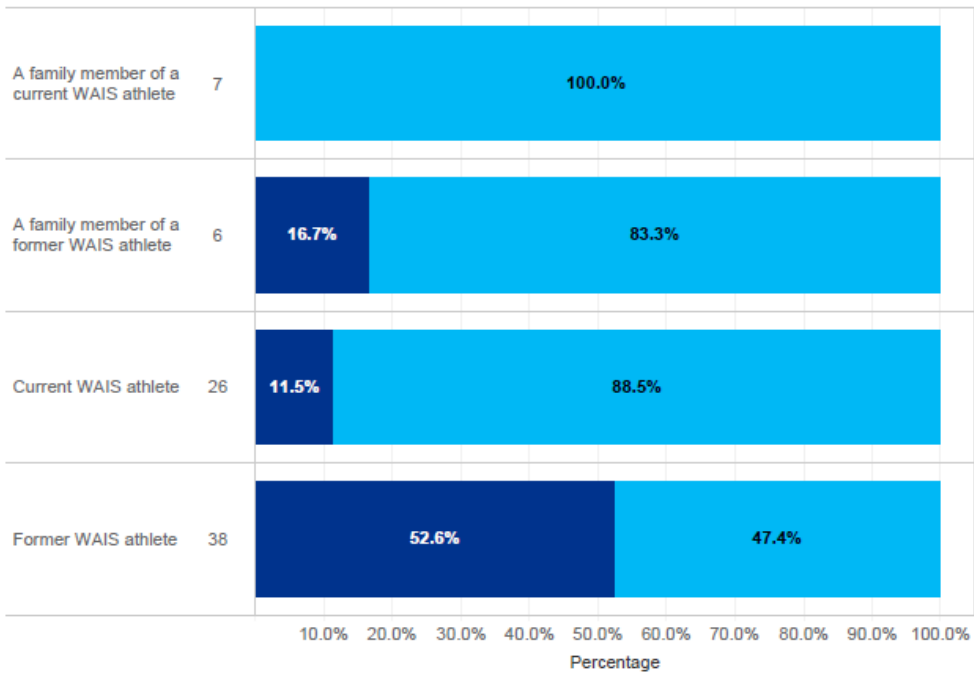


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were being forced to overtrain

Responses by participant group:

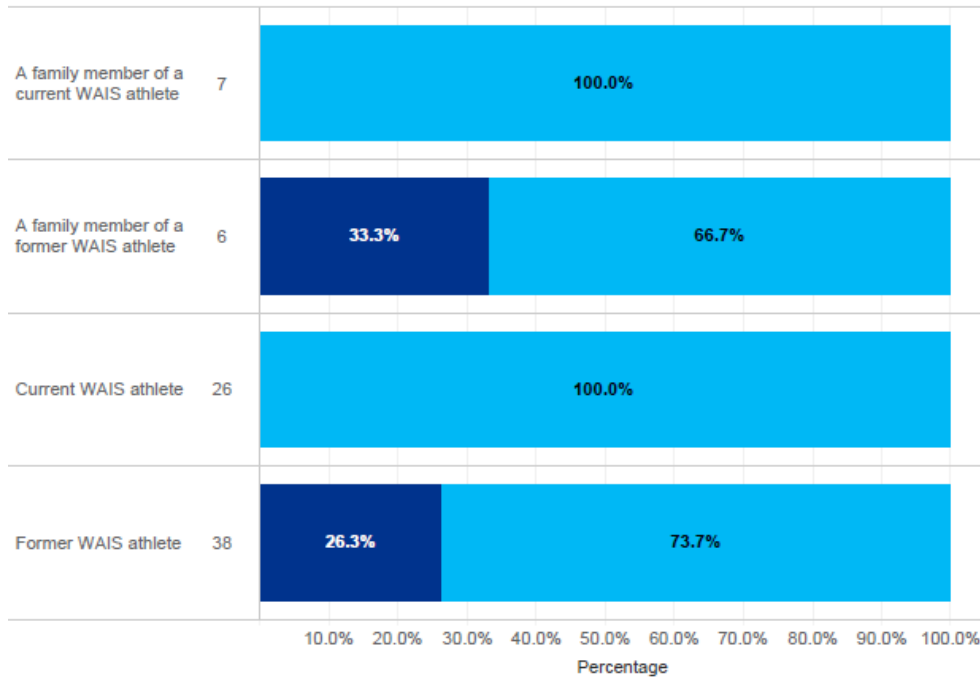


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were being forced to train with injuries

Responses by participant group:

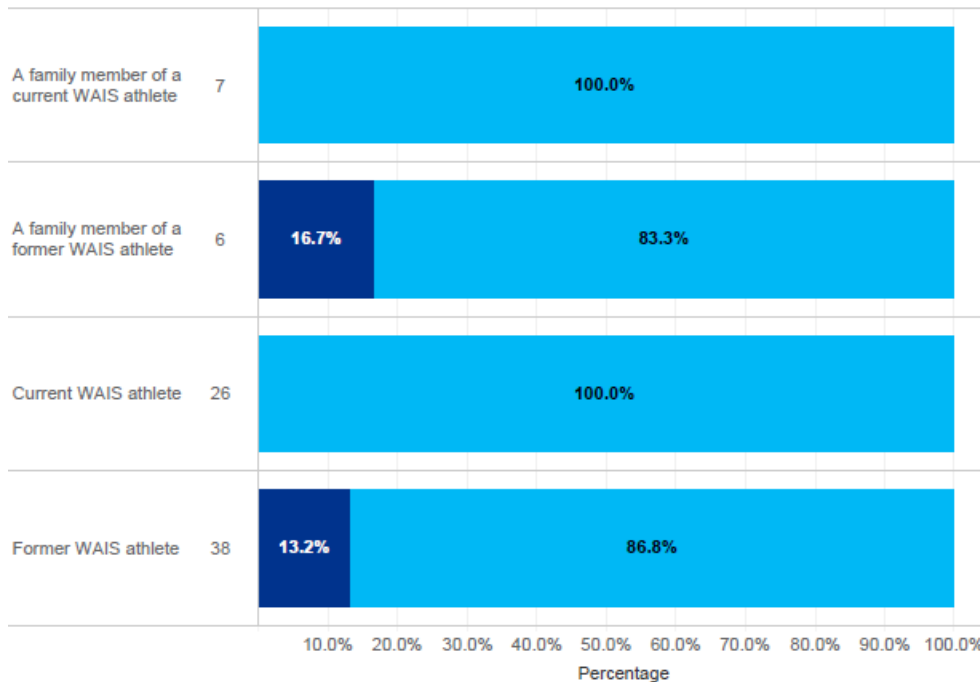


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were given physical punishments

Responses by participant group:

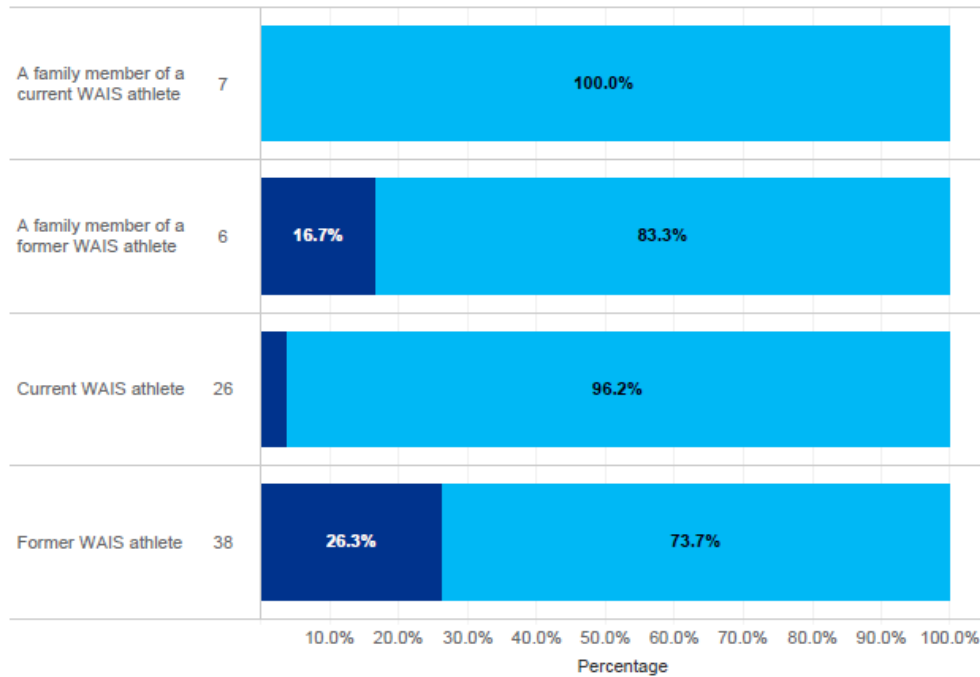


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they would be punished if they did not meet coaches expectations

Responses by participant group:

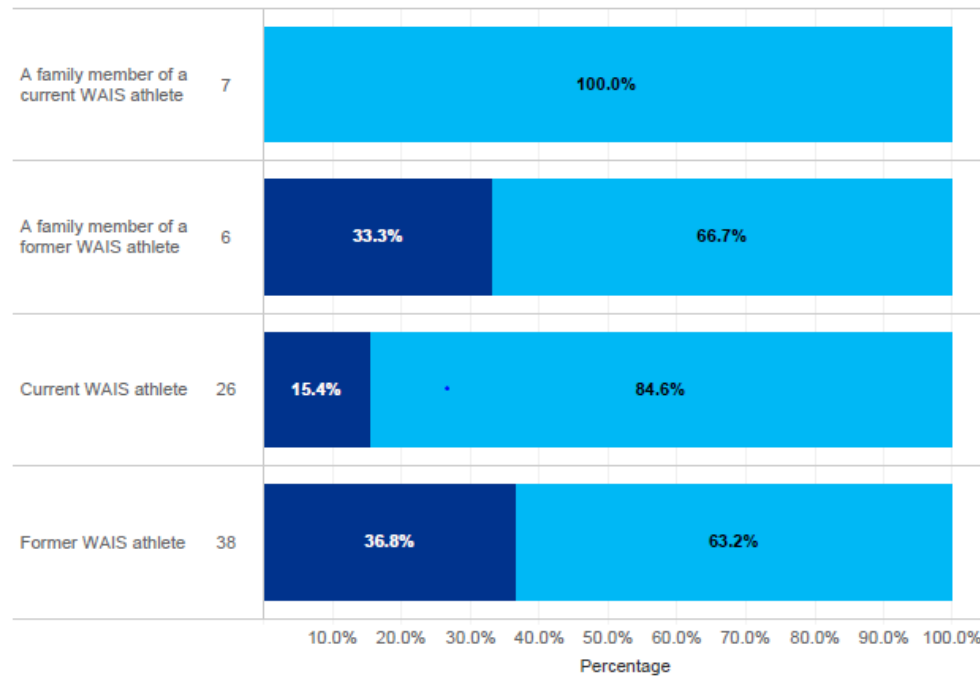


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt uncomfortable around a WAIS staff member

Responses by participant group:

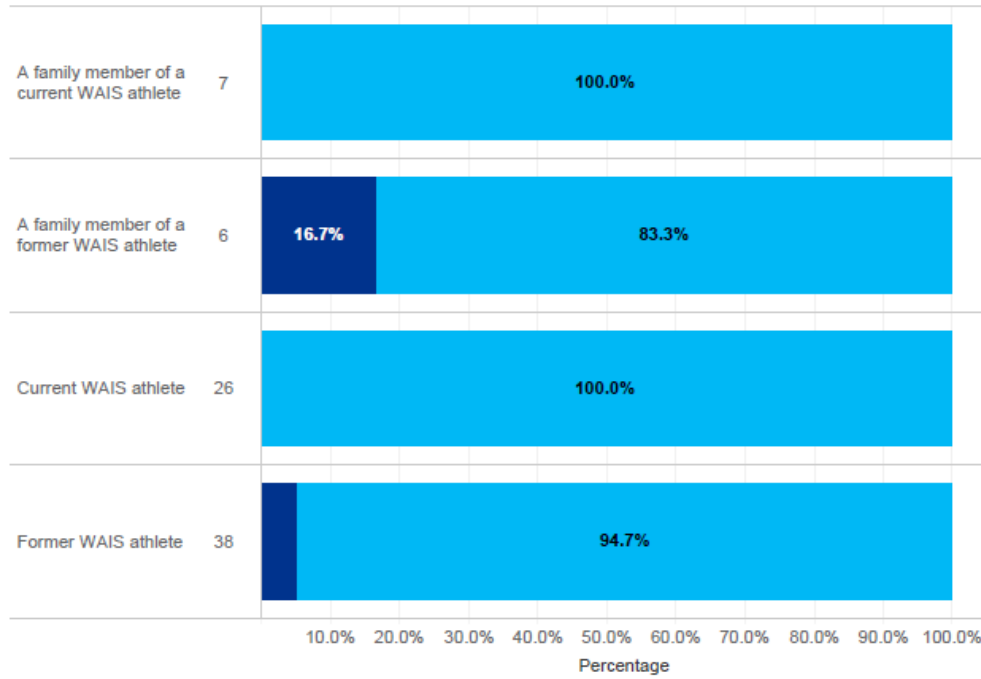


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt uncomfortable around medical staff

Responses by participant group:

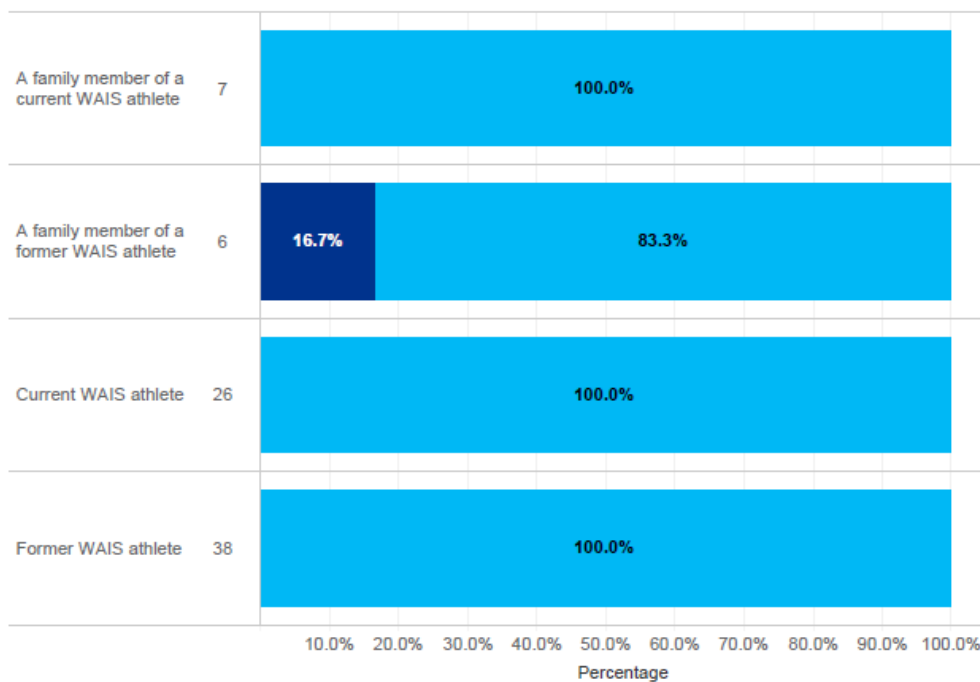


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt uncomfortable around another athlete

Responses by participant group:

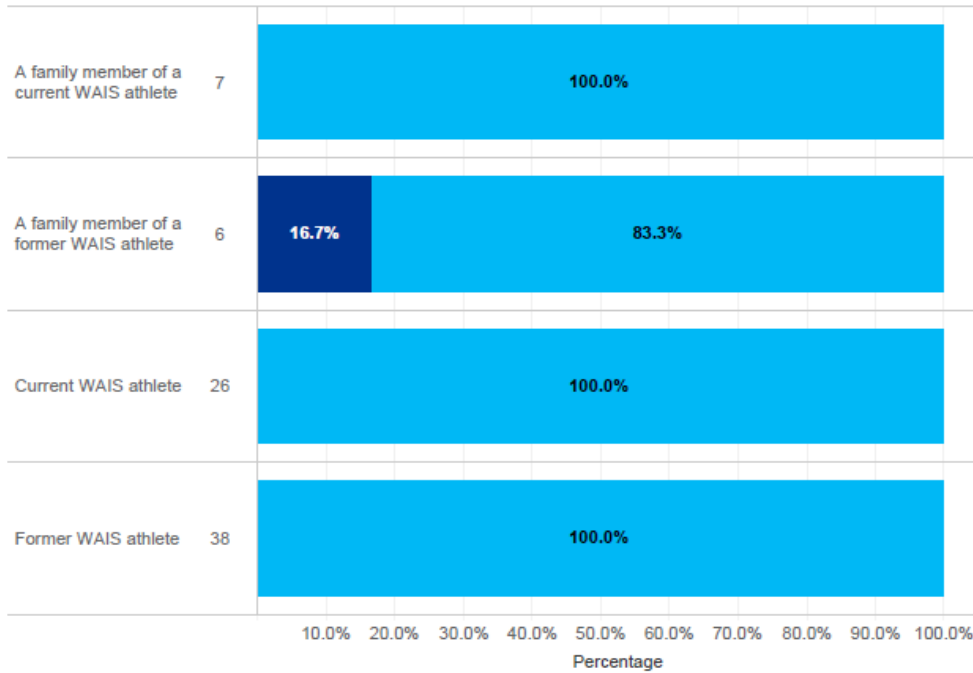


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt uncomfortable around another parent or spectator

Responses by participant group:

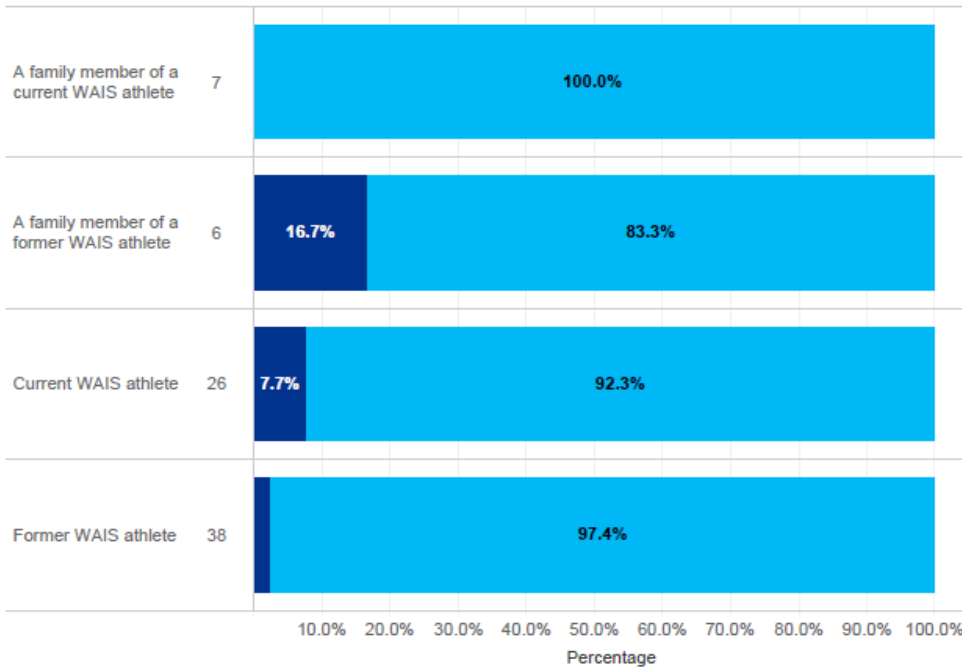


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were getting unwanted attention

Responses by participant group:

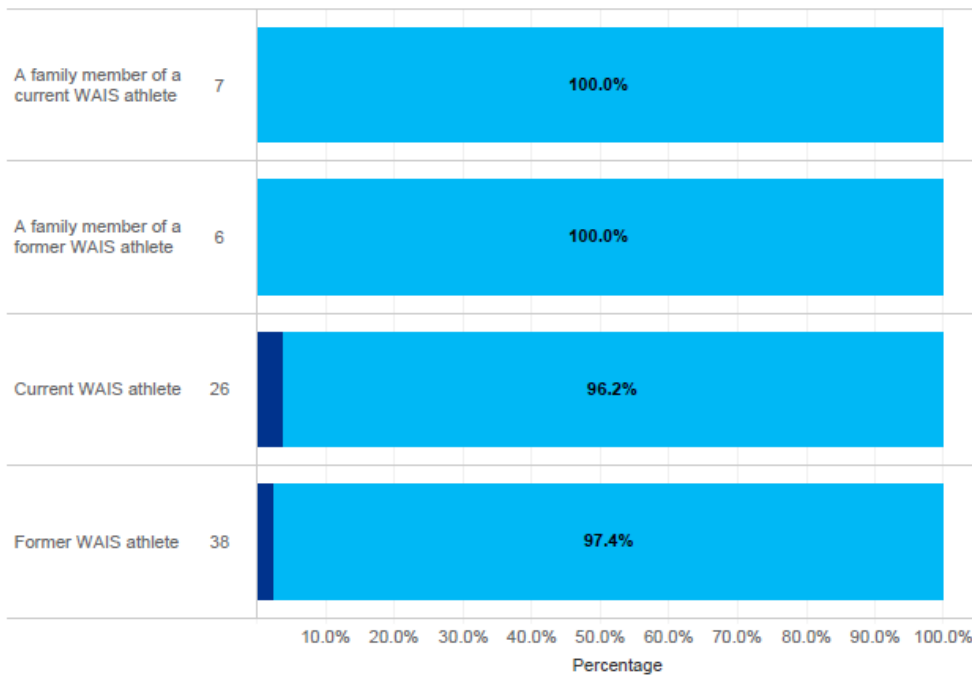


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were getting inappropriate attention

Responses by participant group:

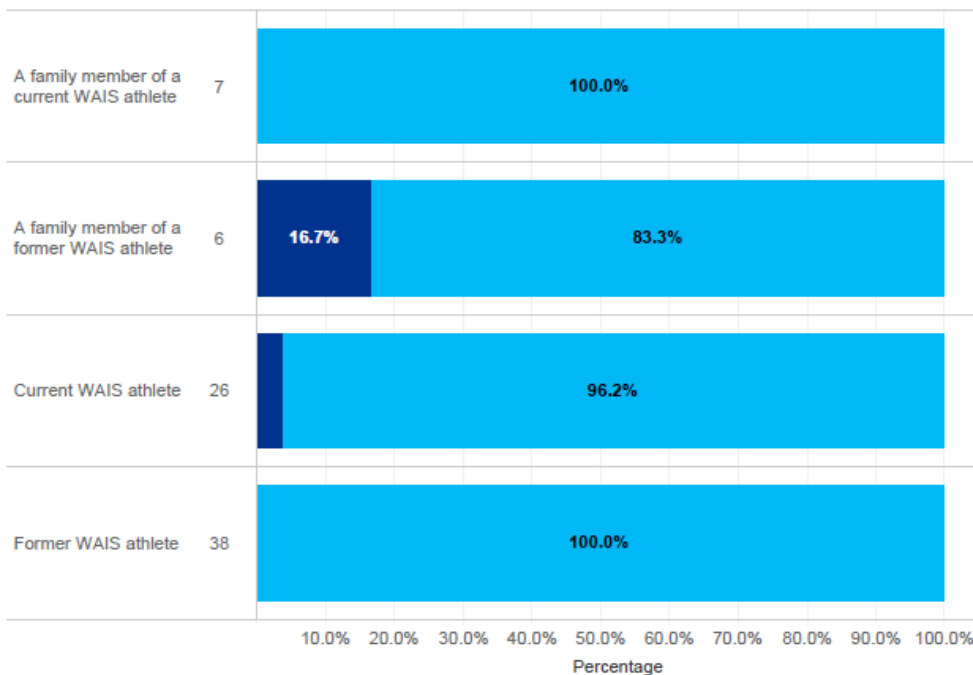


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were inappropriately touched

Responses by participant group:

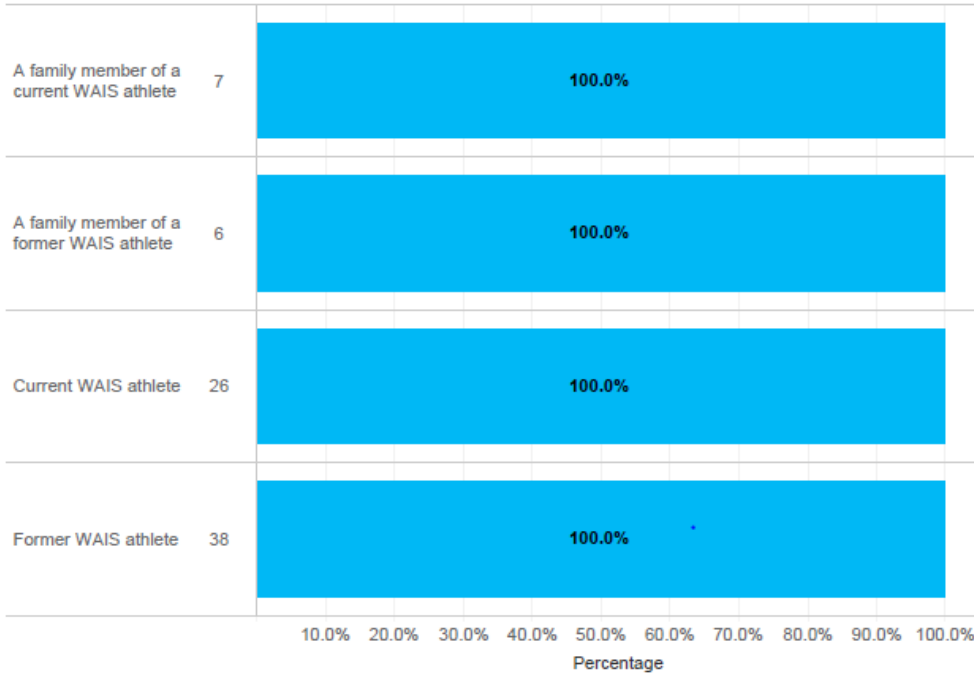


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt they were having an inappropriate relationship with someone who wanted something from them

Responses by participant group:

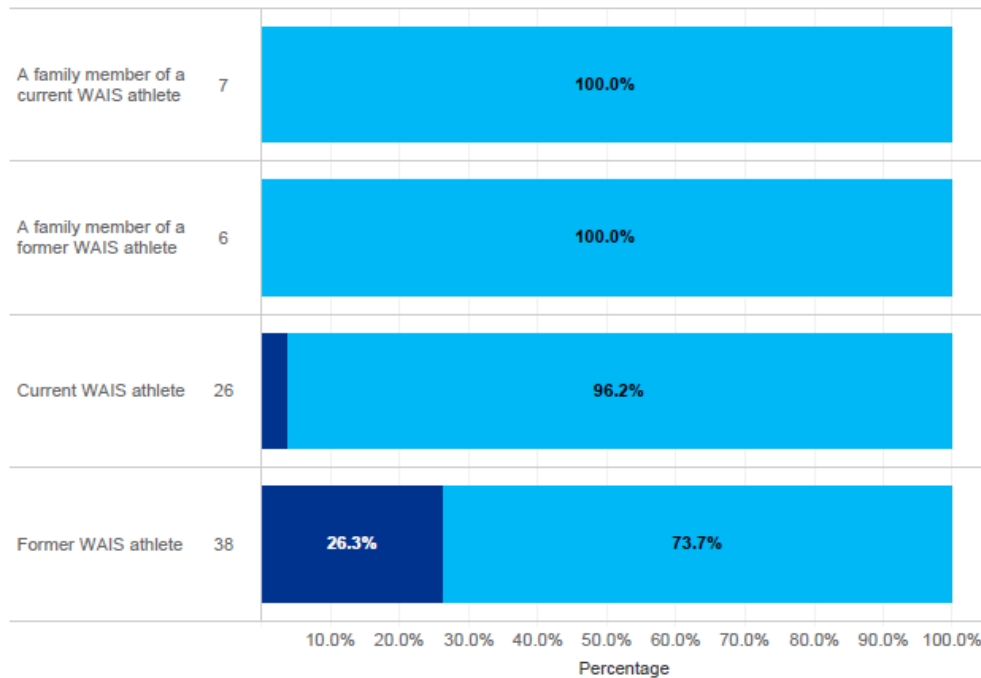


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt isolated from the world outside their sport

Responses by participant group:



Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

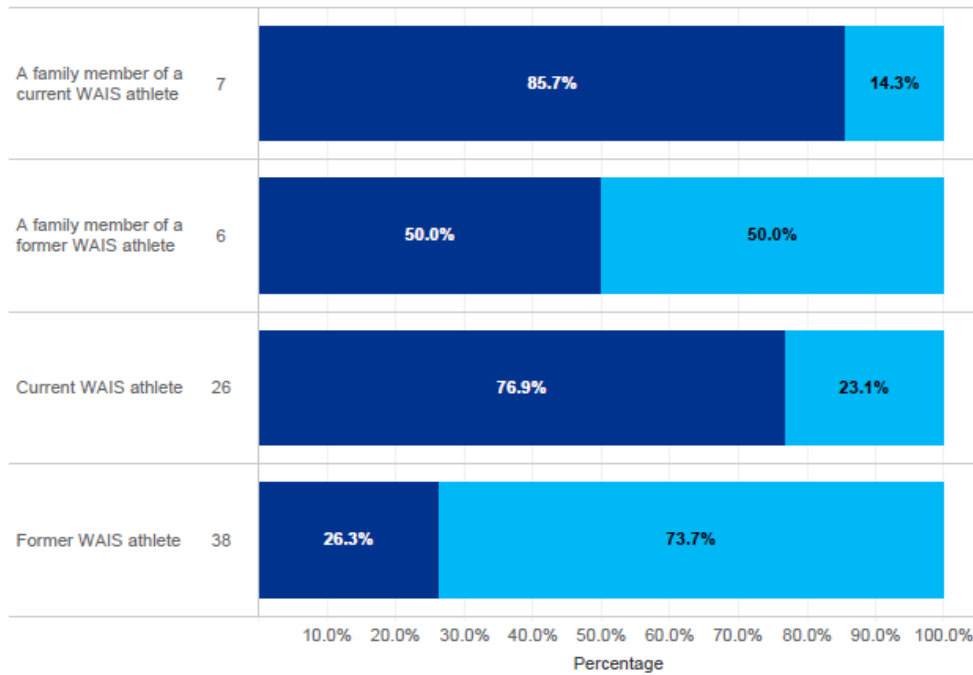
Other

Six respondents indicated that they felt an athlete was an unsafe at WAIS for reasons other than those provided, these included:

- My coaches success was more important than my physical and mental well-being.
- Psychological.
- I felt an injustice despite achieving greater standards than others.
- I felt I was not listened to and neglected from both an athlete and personal perspective.
- Unsupported, lack of respect, ignored, isolated from training with my teammates.
- No feedback. Deliberately ignored. Selection mind games. Calculated Public humiliation.
- The staff where modifying performance data to harm after lodging a grievance.

Respondents have not felt unsafe at WAIS

Responses by participant group:

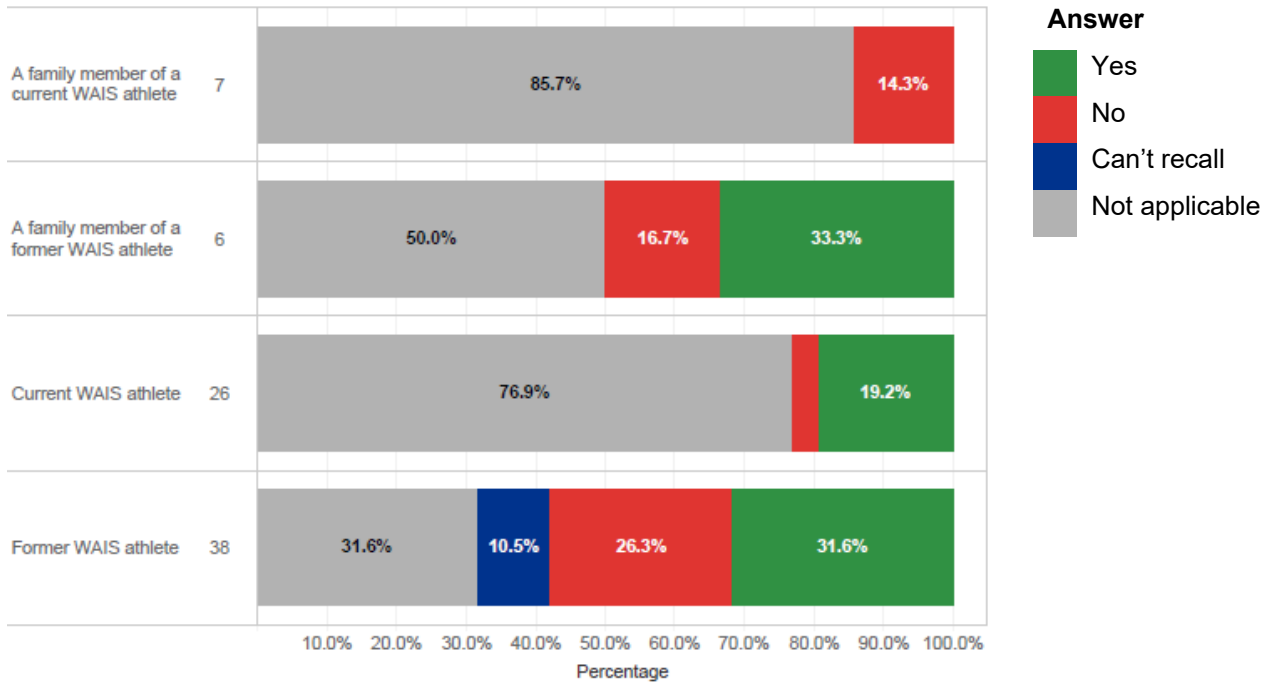


Answer

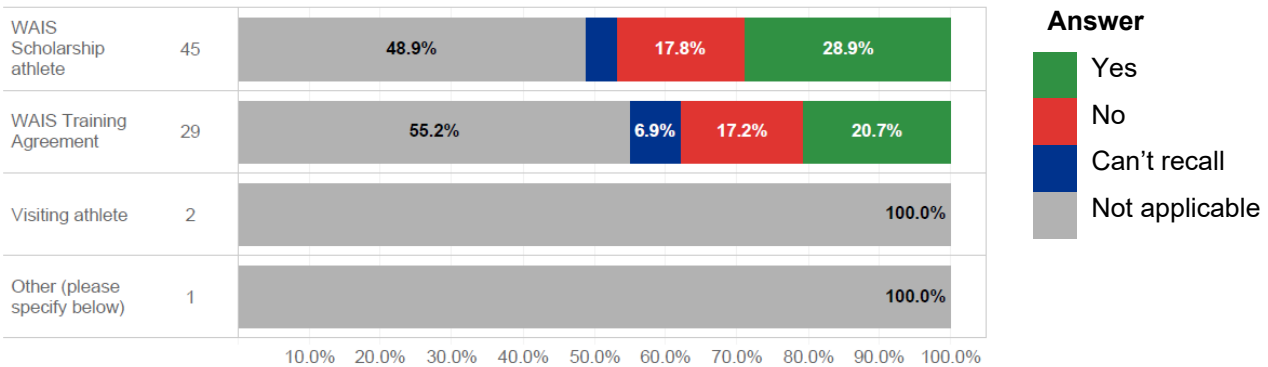
- Option was selected by survey respondents
- Option was not selected by survey respondents

7.2.1.17 When you or your family member felt unsafe, did you tell someone, or talk to someone?

Responses by participant group:



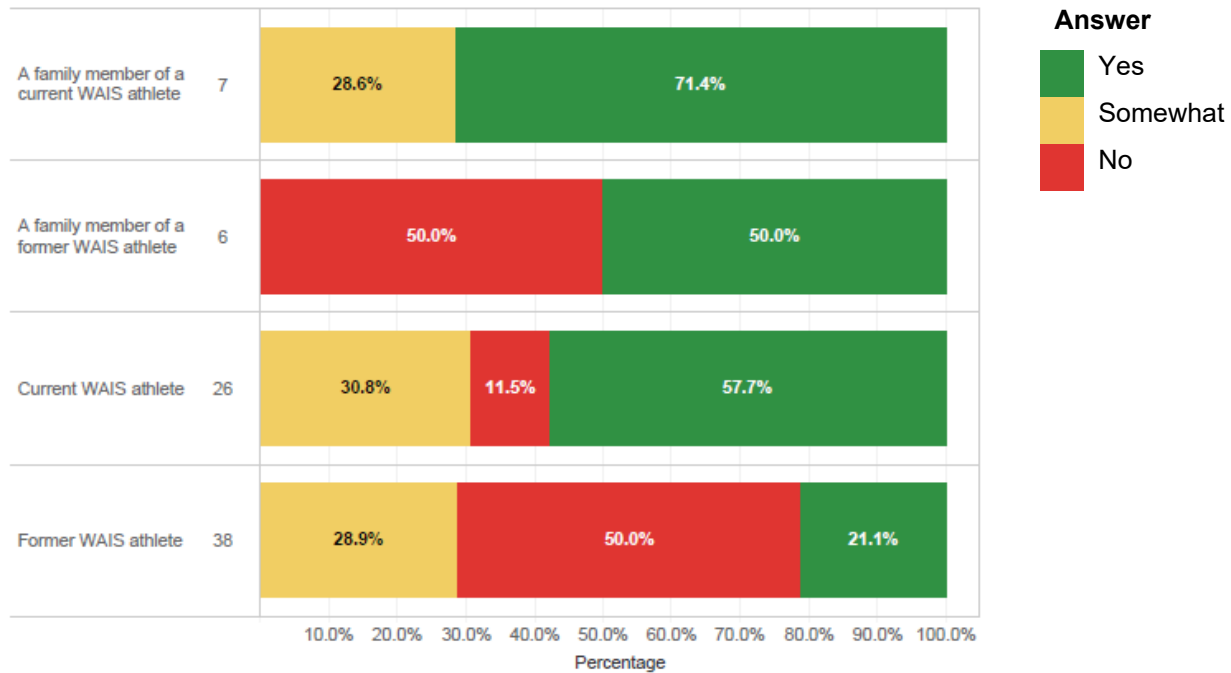
Responses by scholarship type:



Note. Respondents who indicated feeling unsafe at WAIS in 7.2.1.16 were prompted to answer this question. Those who reported that neither they nor their family members have felt unsafe at WAIS were recorded as 'not applicable.'

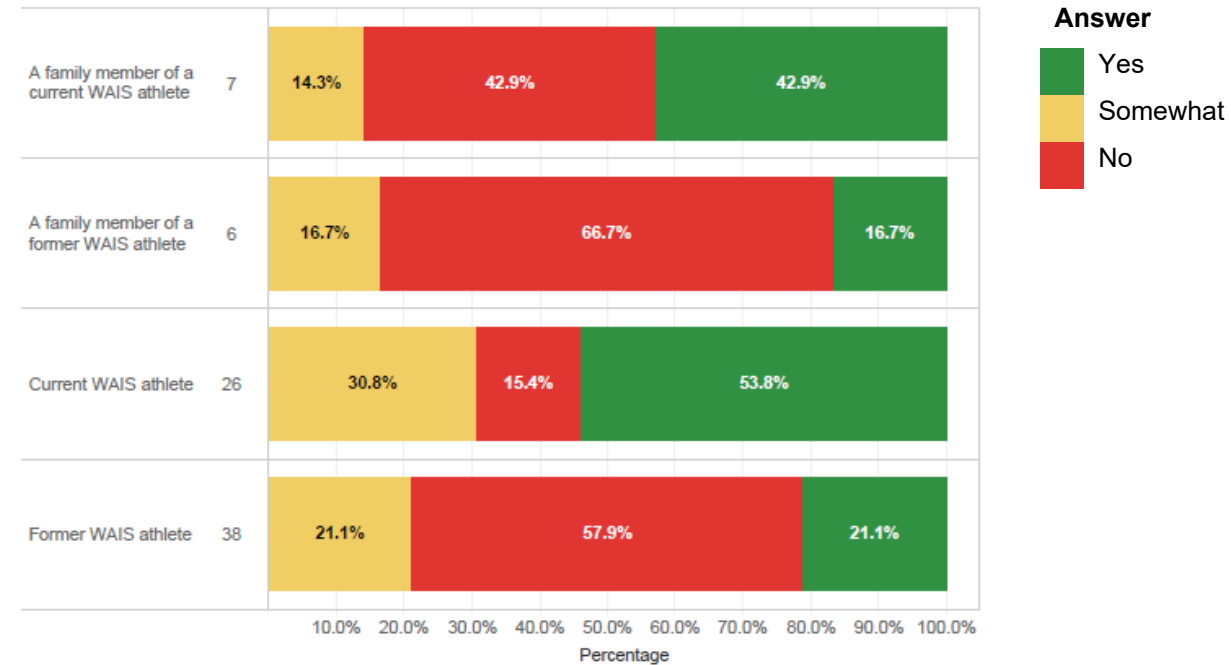
7.2.1.18 When you or your family member were at WAIS, did you know how to raise complaints about safety and wellbeing?

Responses by participant group:



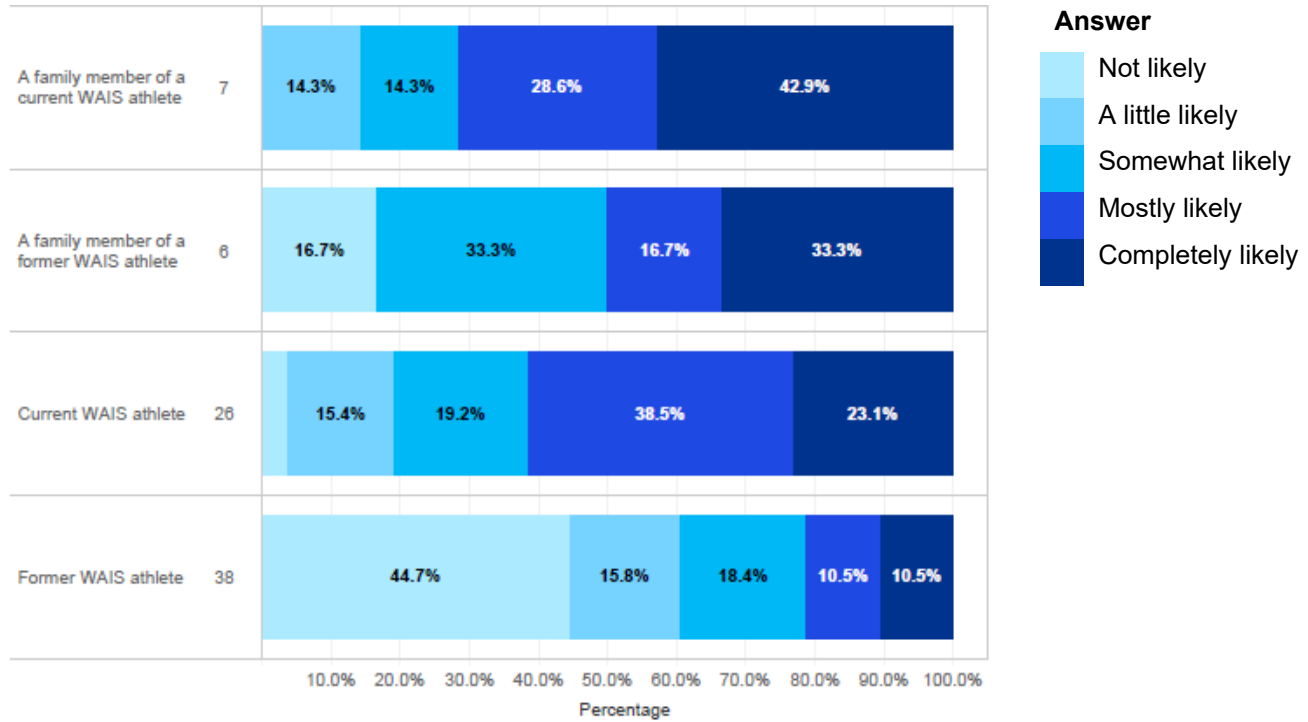
7.2.1.19 When you or your family member were at WAIS, did WAIS tell you how to raise a complaint if you, or someone you know, were unsafe.

Responses by participant group:



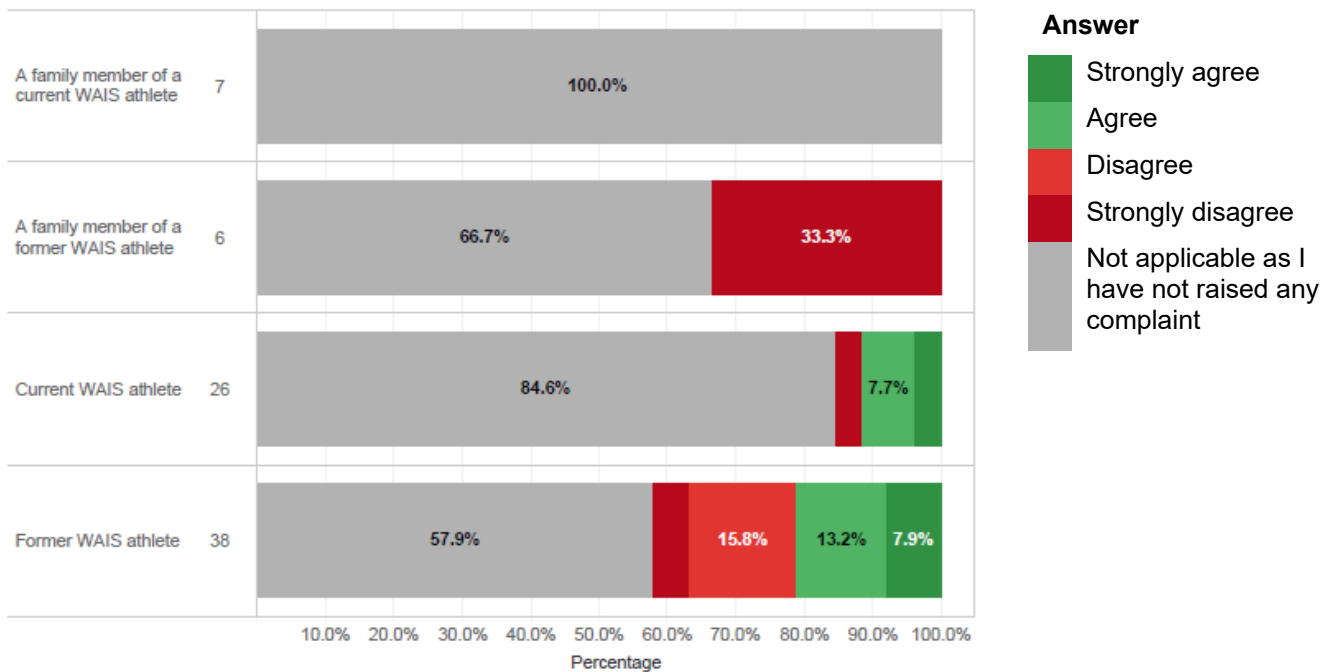
7.2.1.20 When you or your family member were at WAIS, how likely were you to raise complaints if you had a problem about athlete safety and wellbeing?

Responses by participant group:



7.2.1.21 When I have previously raised a complaint, I felt it was addressed by WAIS in a timely manner.

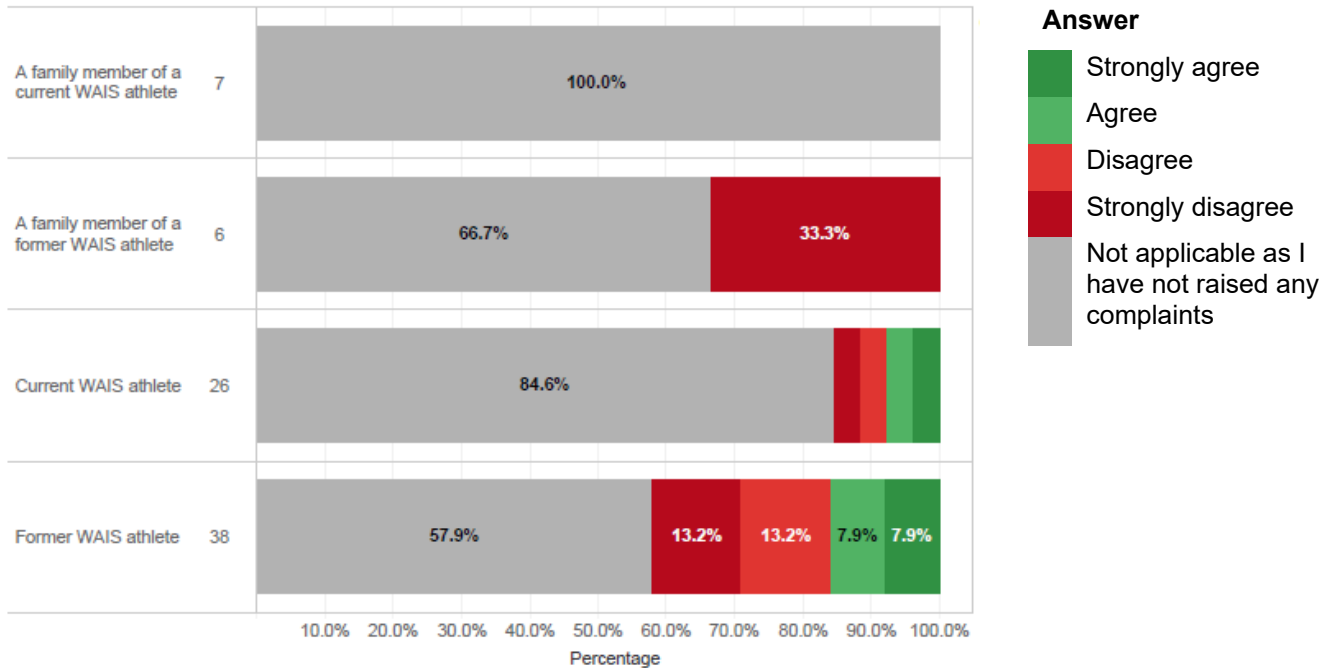
Responses by participant group:



7.2.1.22 When I have previously raised a complaint, I felt WAIS responded appropriately.

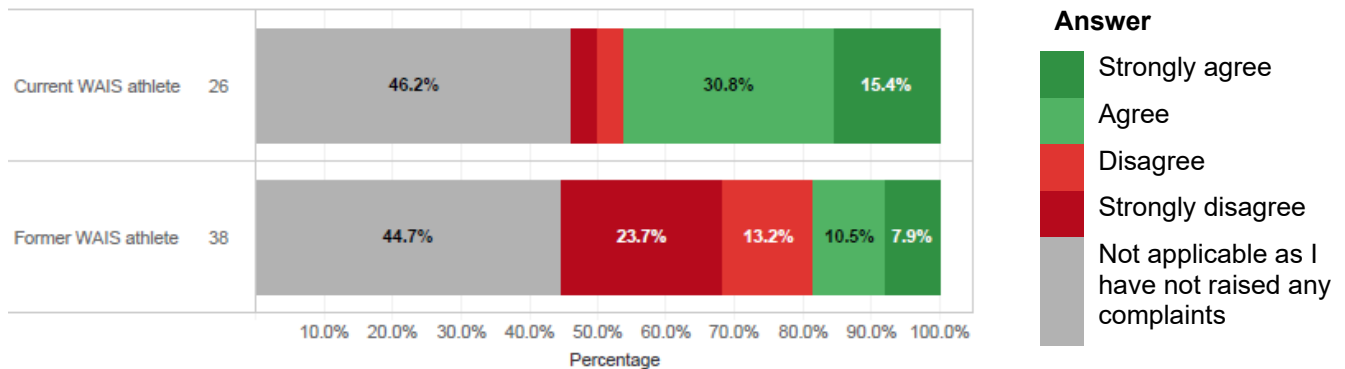
Responses by participant group:

Athletes



7.2.1.23 Leaders at WAIS encourage me to raise complaints about athlete safety and wellbeing.

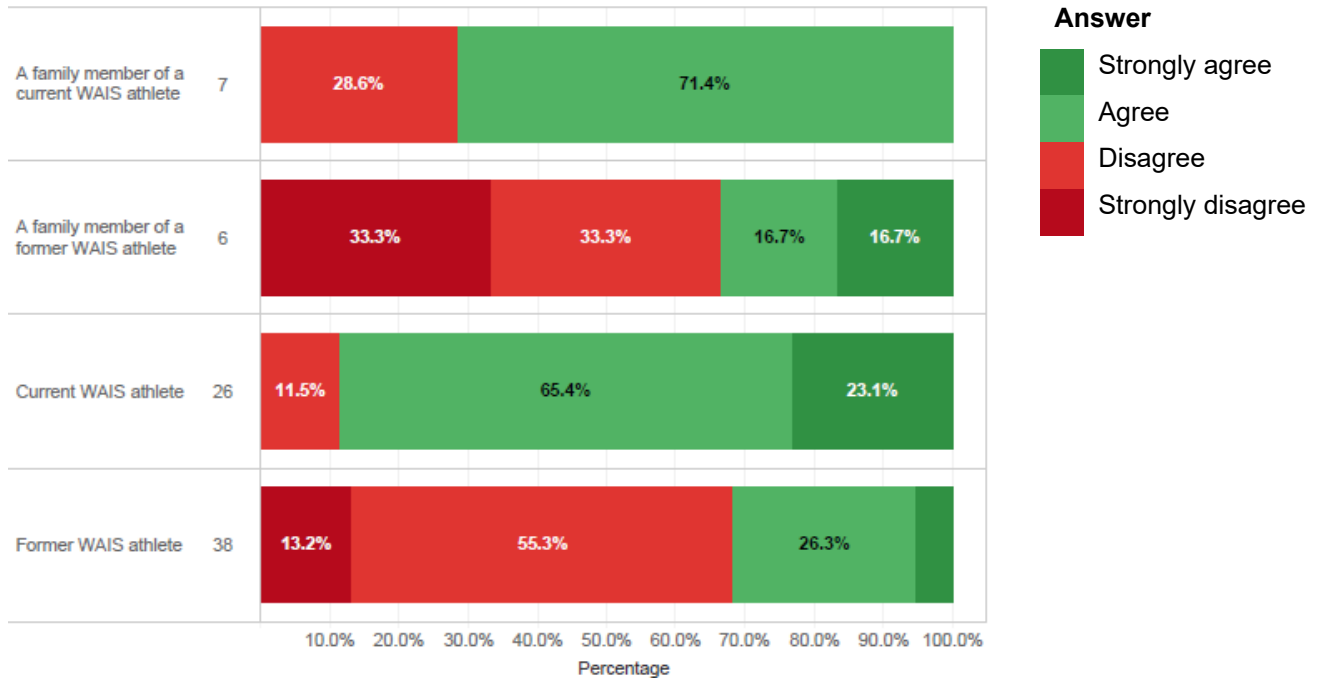
Responses by participant group:



Note: This survey question was answered by current and former athletes only.

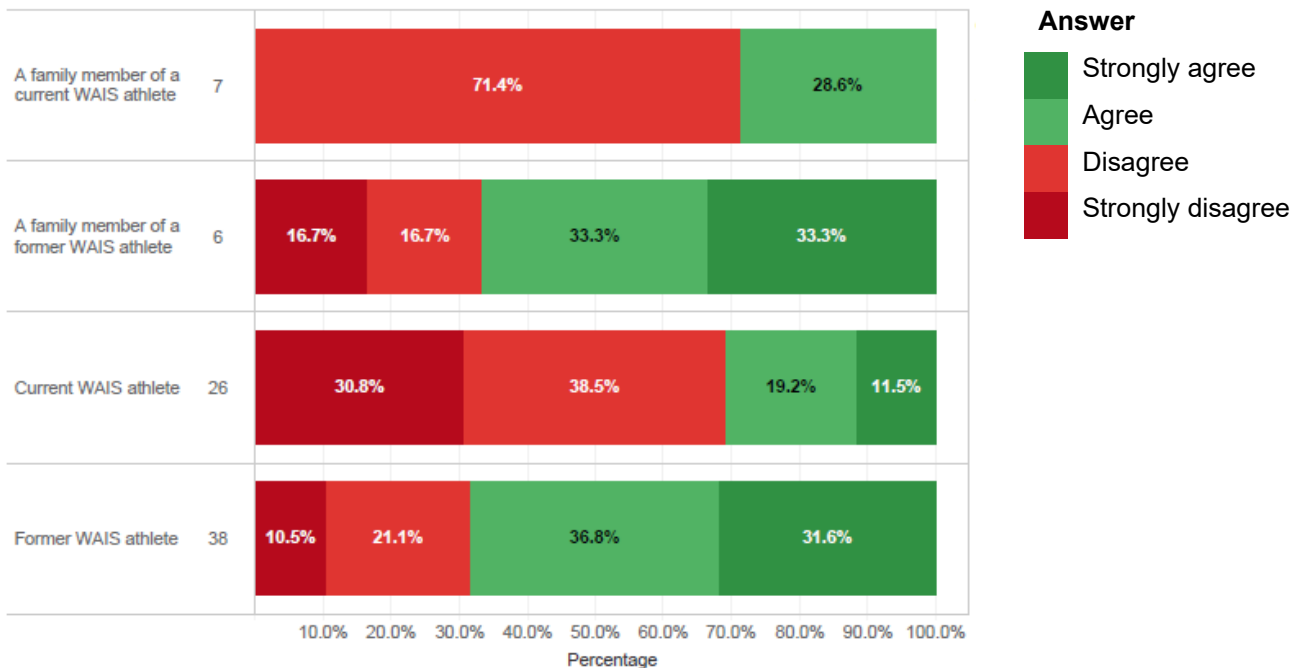
7.2.1.24 There are multiple channels to raise a complaint.

Responses by participant group:



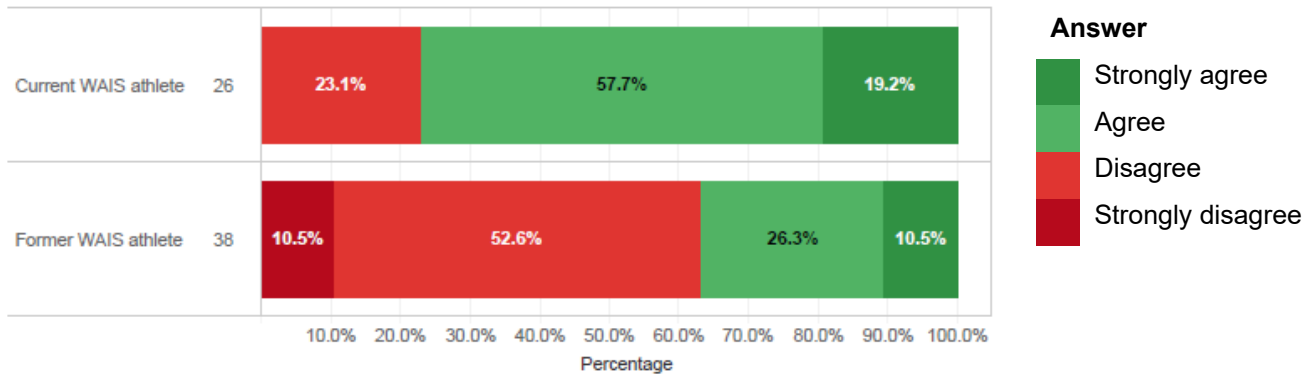
7.2.1.25 I am worried that if I raised a complaint, I could jeopardise my place, or my family member's place, at WAIS or be punished.

Responses by participant group:



7.2.1.26 I receive information and guidance on what it means to be safe at WAIS.

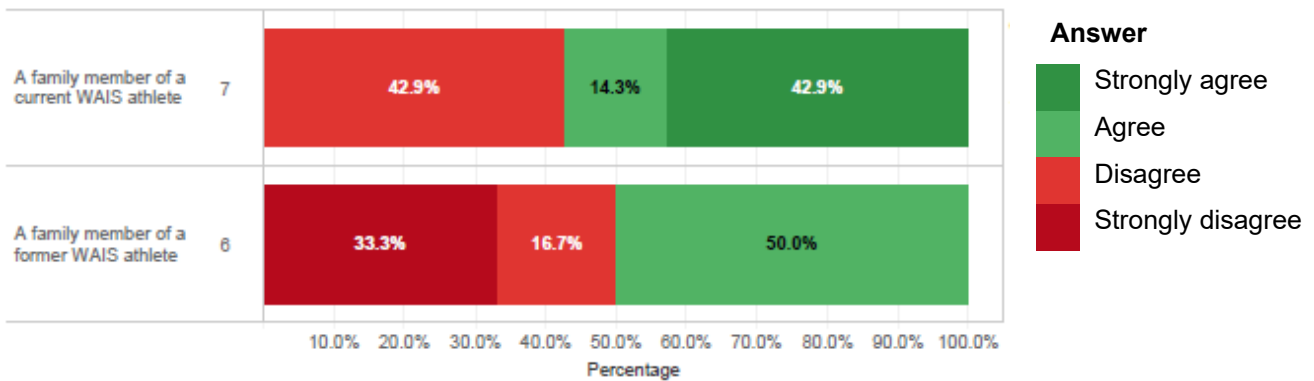
Responses by participant group:



Note: This survey question was answered by current and former athletes only.

7.2.1.27 I receive information and guidance on what it means for my family member to be safe at WAIS.

Responses by participant group:



Note: This survey question was answered by families of athletes only.

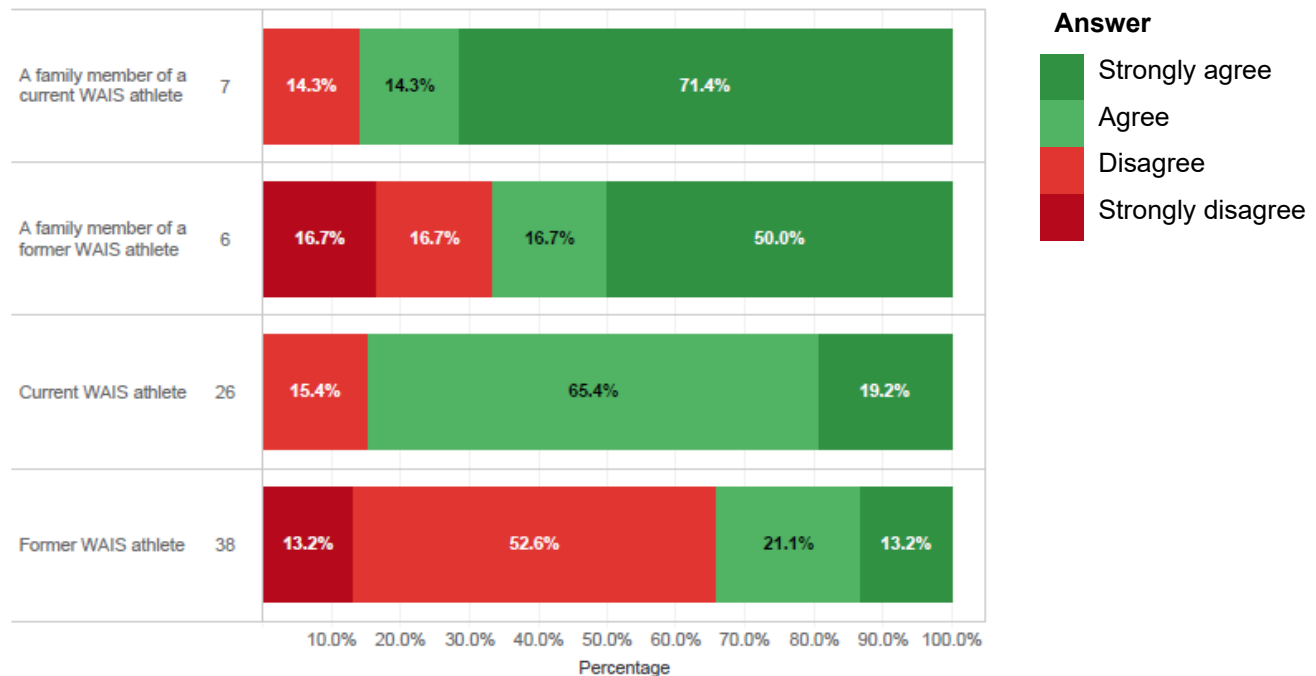
7.2.1.28 I receive information and guidance on how WAIS staff and coaches should treat me or my family member.

Responses by participant group:



7.2.1.29 I feel confident to raise complaints about behaviours that do not align with WAIS' code of conduct.

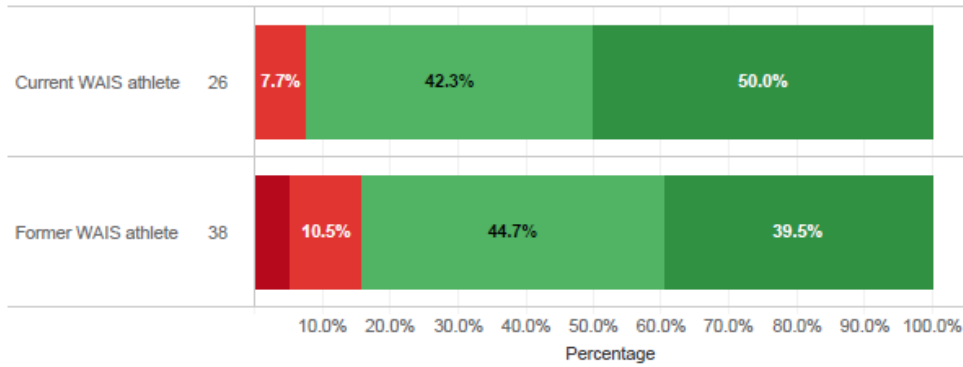
Responses by participant group:



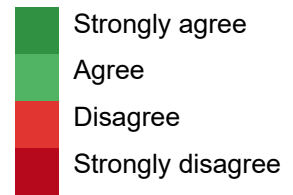
7.2.1.30 I feel safe from harm in the physical environment where I train.

Responses by participant group:

Athletes



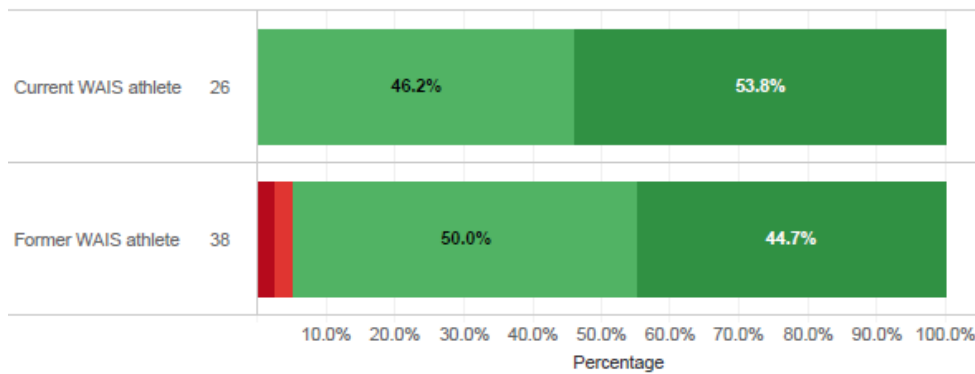
Answer



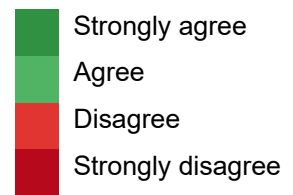
Note: This survey question was answered by current and former athletes only.

7.2.1.31 I feel safe from harm when traveling with coaches.

Responses by participant group:



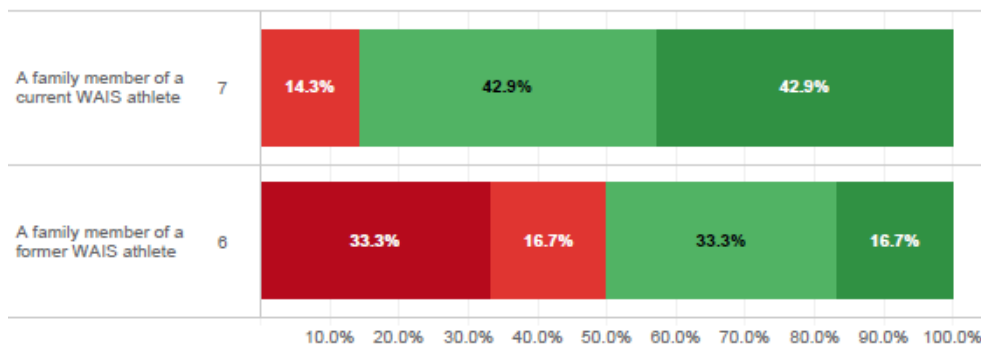
Answer



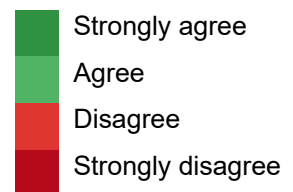
Note: This survey question was answered by current and former athletes only.

7.2.1.32 I am aware of policies and procedures which promote athlete safety and wellbeing at WAIS.

Responses by participant group:



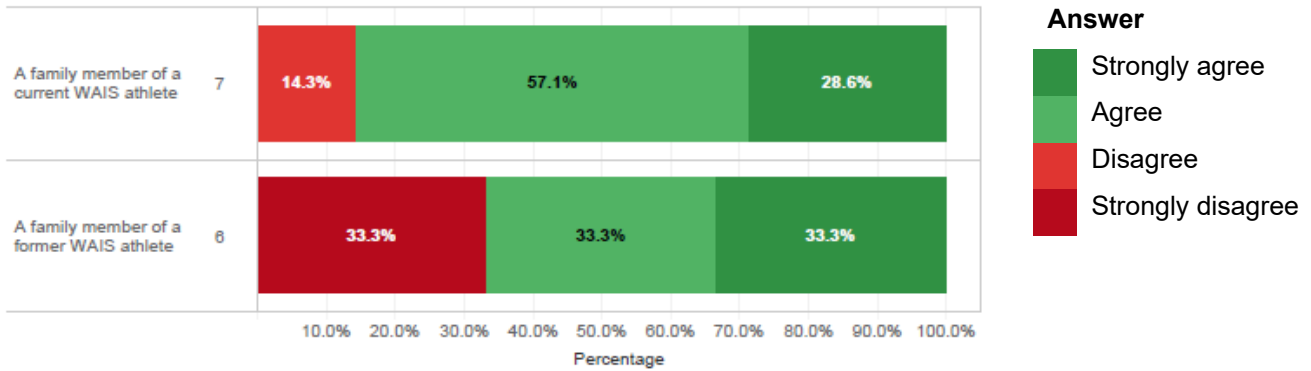
Answer



Note: This survey question answered by families of athletes only.

7.2.1.33 I am appropriately involved in the decision making regarding my family member(s).

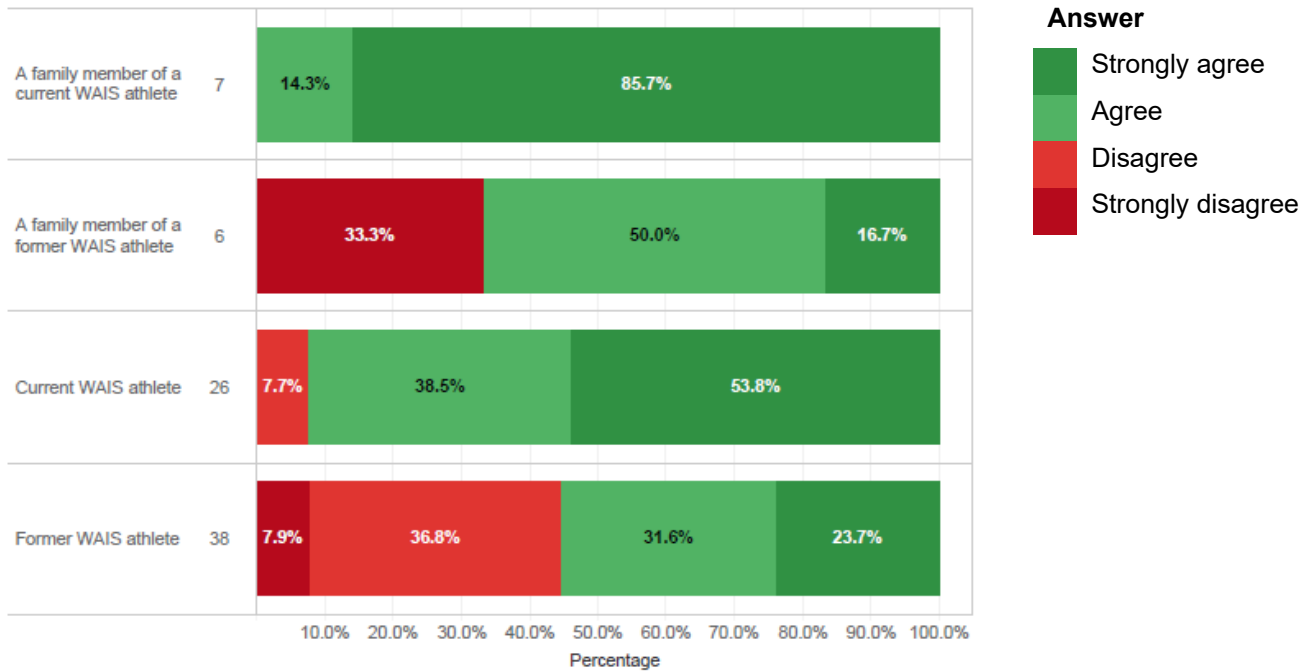
Responses by participant group:



Note: This survey question was answered by families of athletes only.

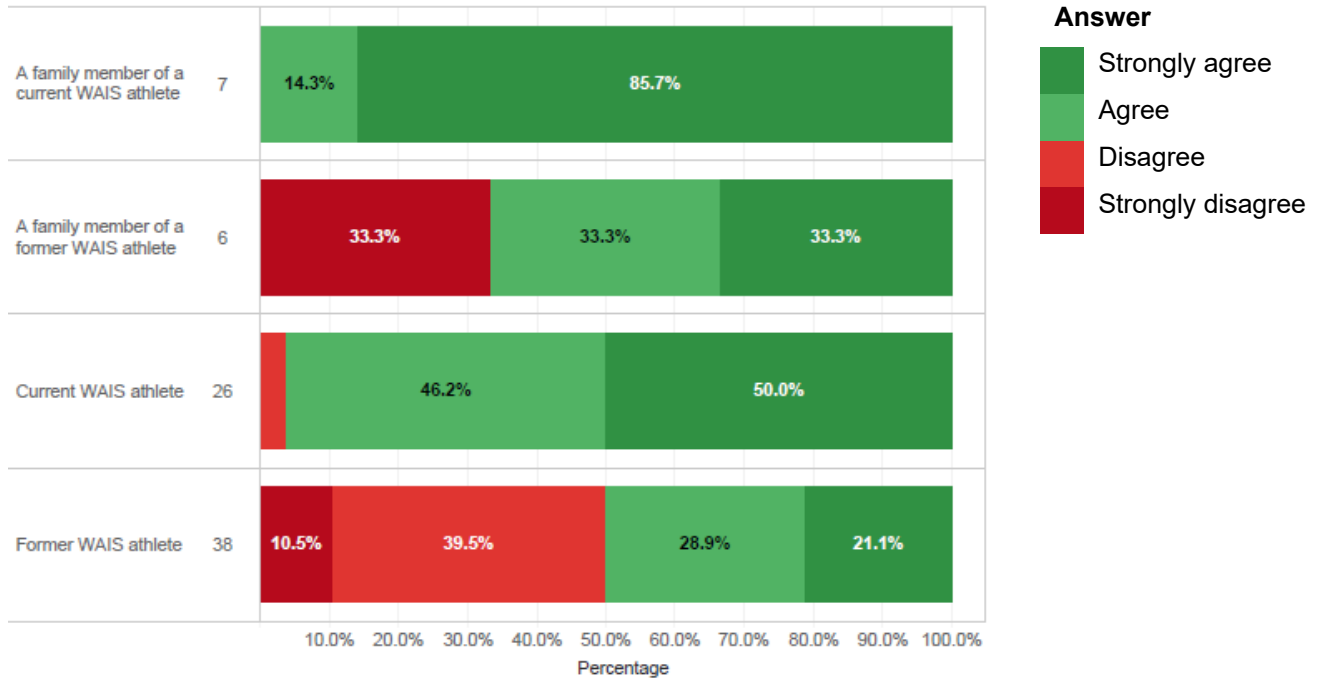
7.2.1.34 I believe WAIS staff, including coaches, set a good example for positive athlete safety and wellbeing at WAIS.

Responses by participant group:



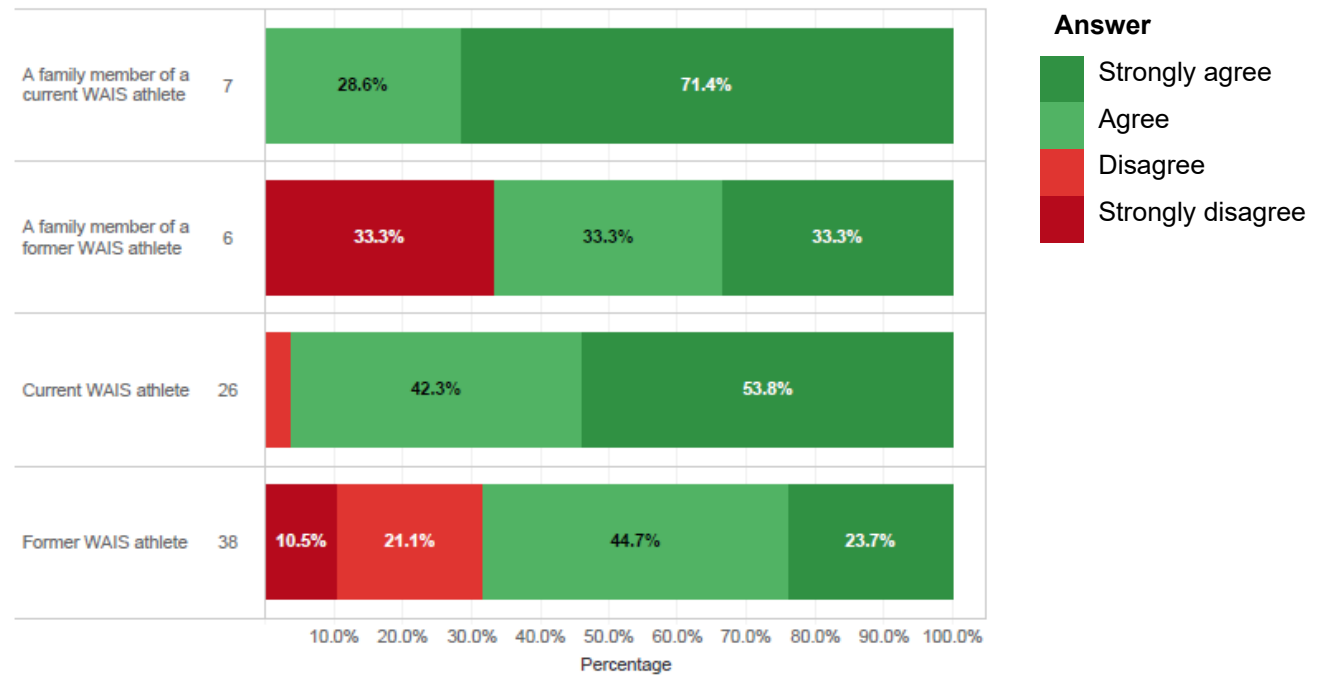
7.2.1.35 I believe WAIS coaches are motivated to create a safe environment for athletes.

Responses by participant group:



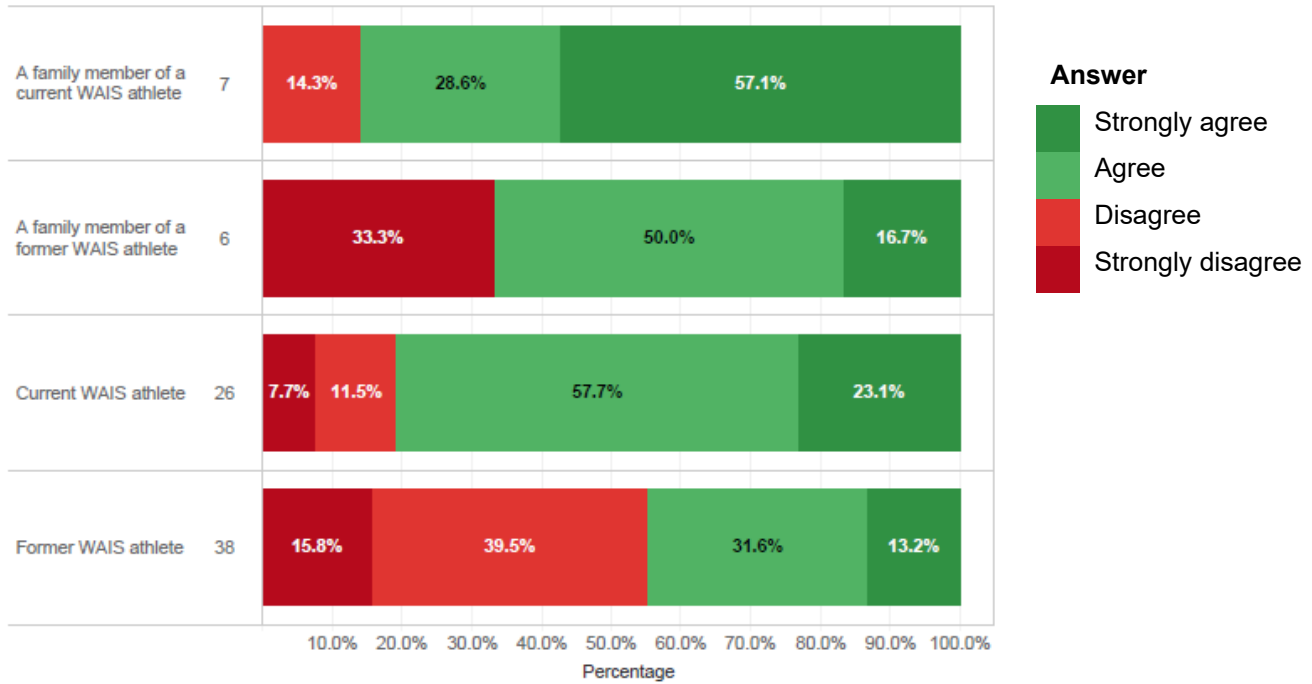
7.2.1.36 I believe WAIS management are motivated to create a safe environment for athletes.

Responses by participant group:



7.2.1.37 I believe people at WAIS are held accountable for their actions.

Responses by participant group:

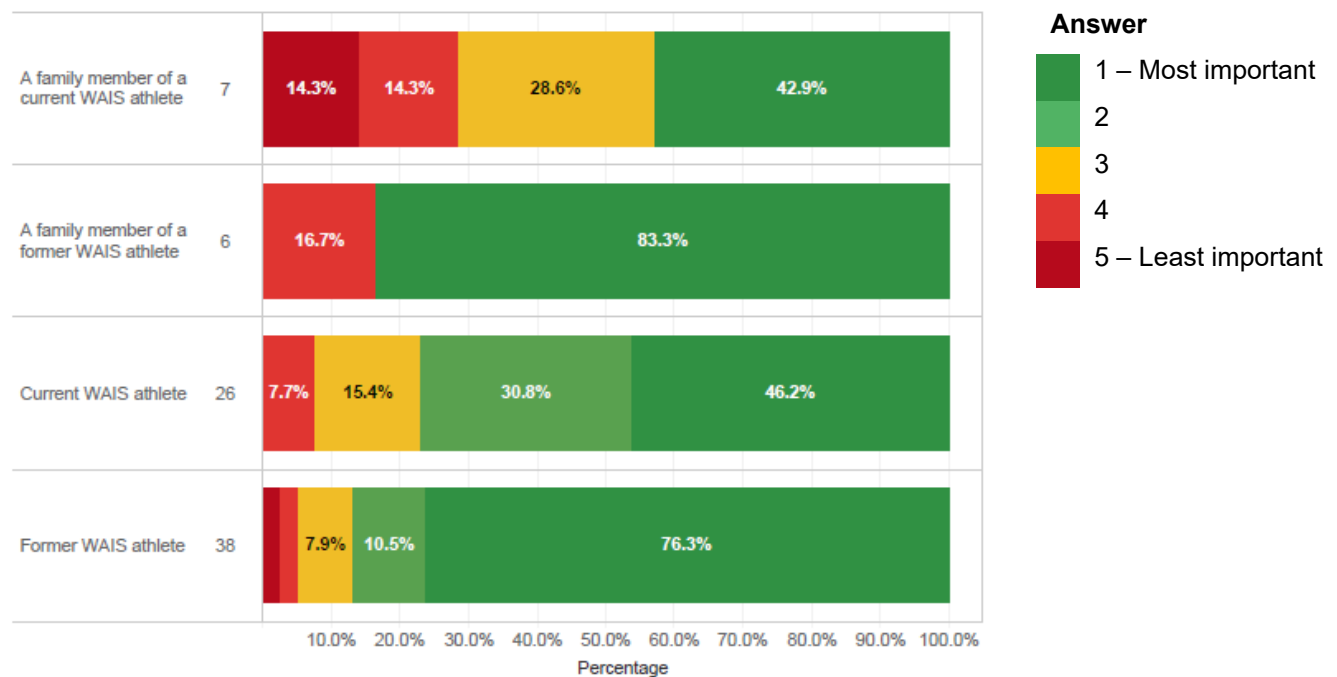


7.2.1.38 We would like to understand what you think WAIS believes are the most important factors in sport.

Athletes and families of athletes were asked to rank the below factors in order of importance according to what you believe WAIS values, with 1 being the most important and 5 being the least important.

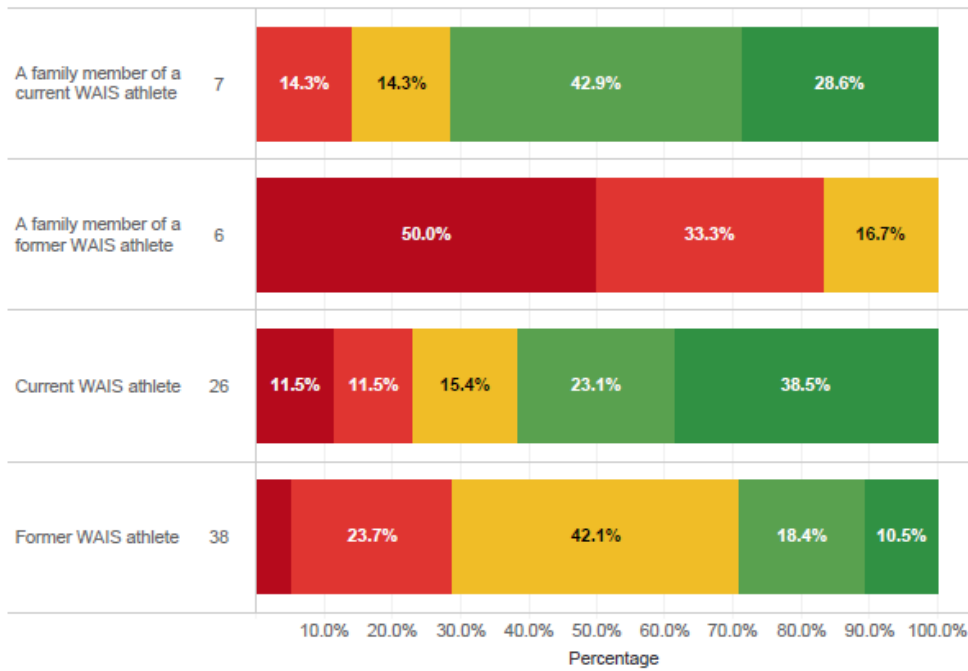
High Performance

Responses by participant group:

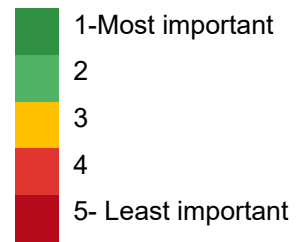


Athlete safety

Responses by participant group:

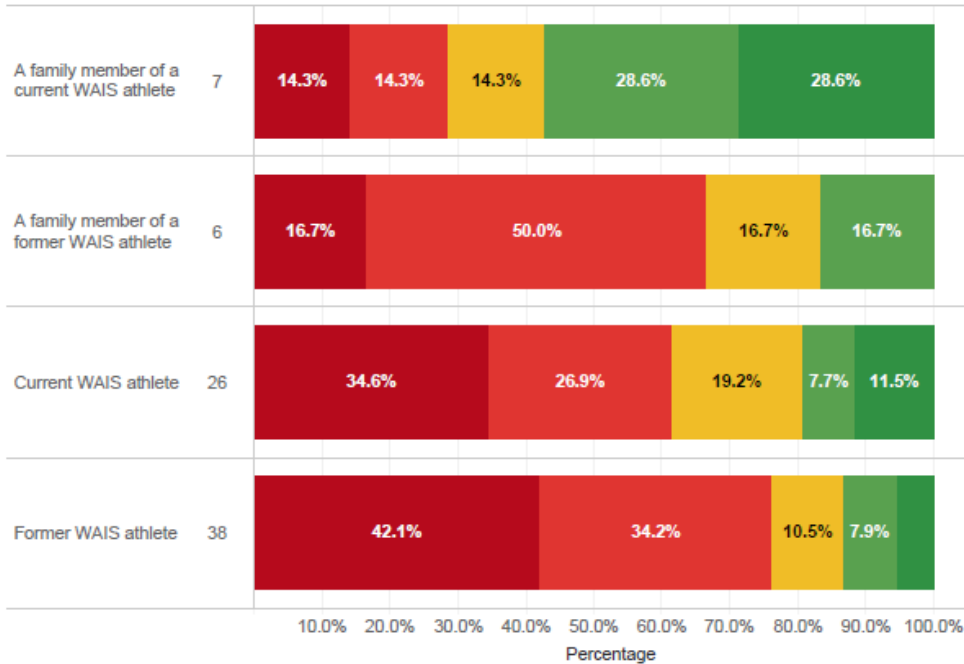


Answer

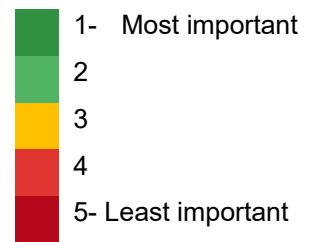


Athlete happiness

Responses by participant group:

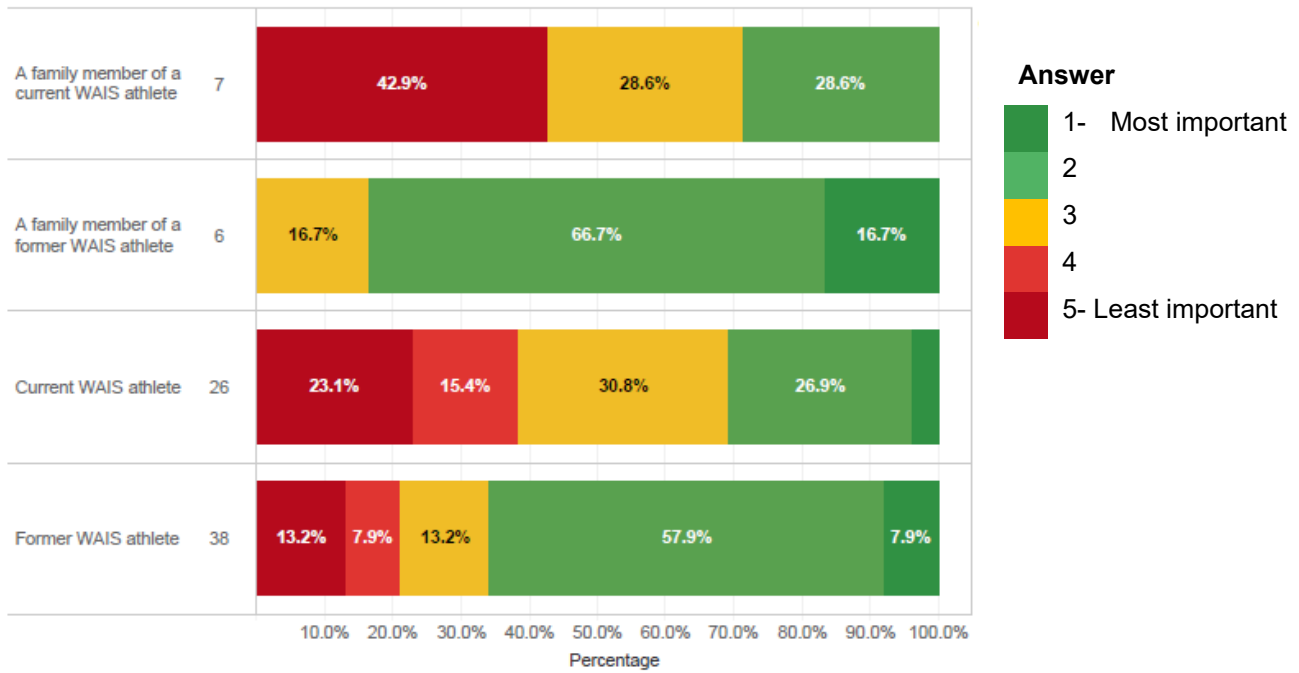


Answer



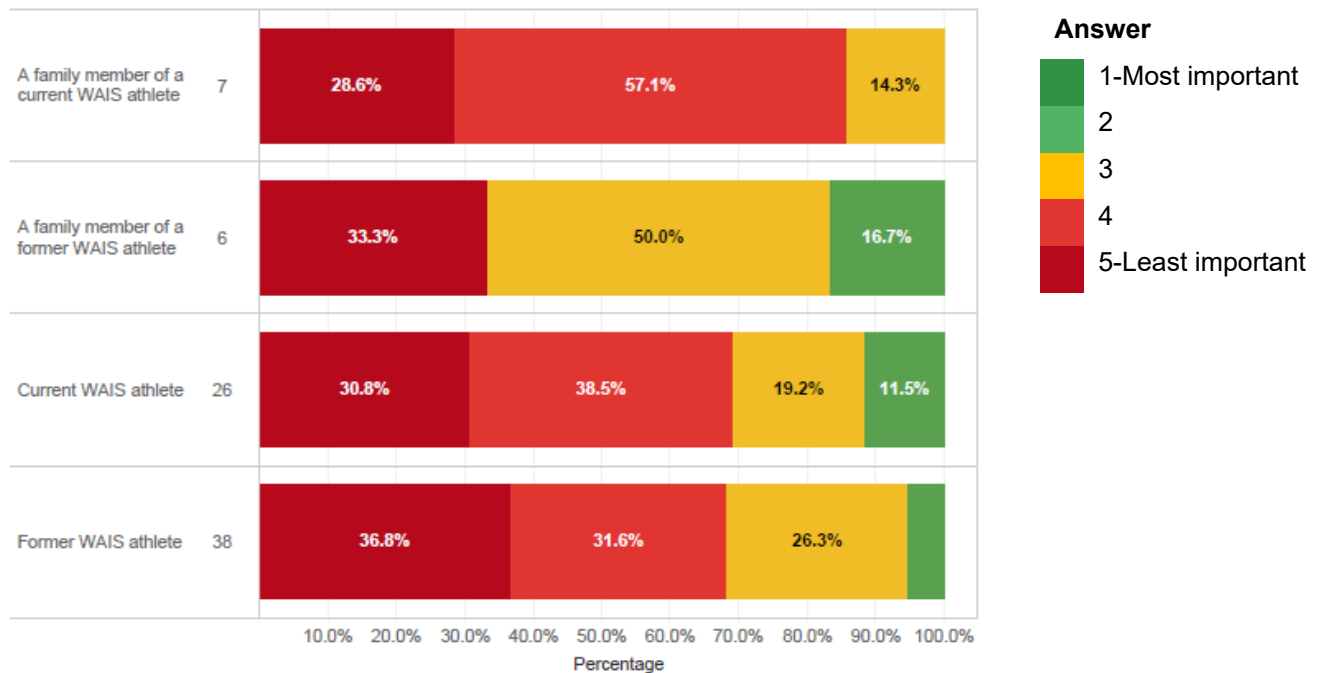
Physical fitness

Responses by participant group:



Personal development

Responses by participant group:



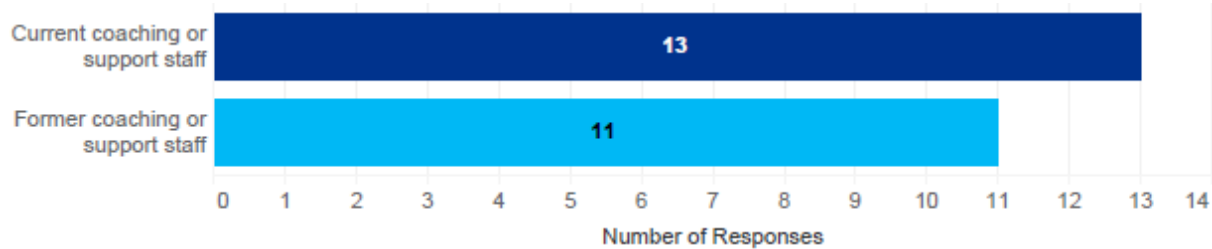
7.2.2 Coaches and support staff survey results

Current and former WAIS coaches and support staff involved with WAIS during the Review period were eligible to complete a survey.

Questions and results are documented below.

7.2.2.1 Are you a current or former coaching or support staff WAIS

Count of respondents:

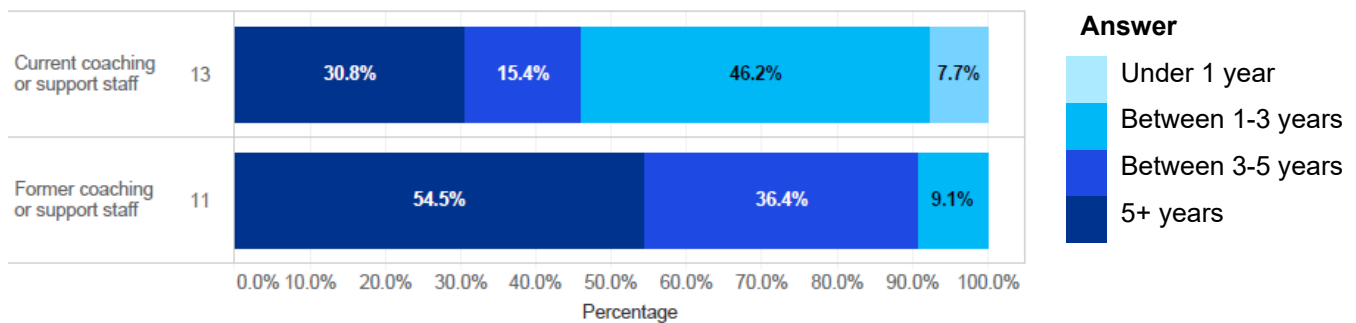


7.2.2.2 What year did you last work at WAIS? Please select the month and year

The survey was only to be completed by participants who were involved with WAIS within the last 5 years (the Review period). Those who selected a date and time prior to April 2019 did not complete the survey.

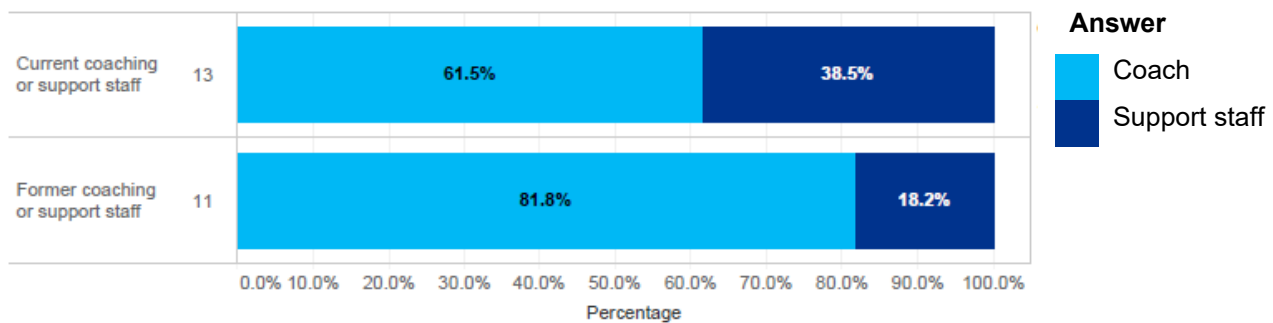
7.2.2.3 How long have you been employed at WAIS?

Responses by participant group:



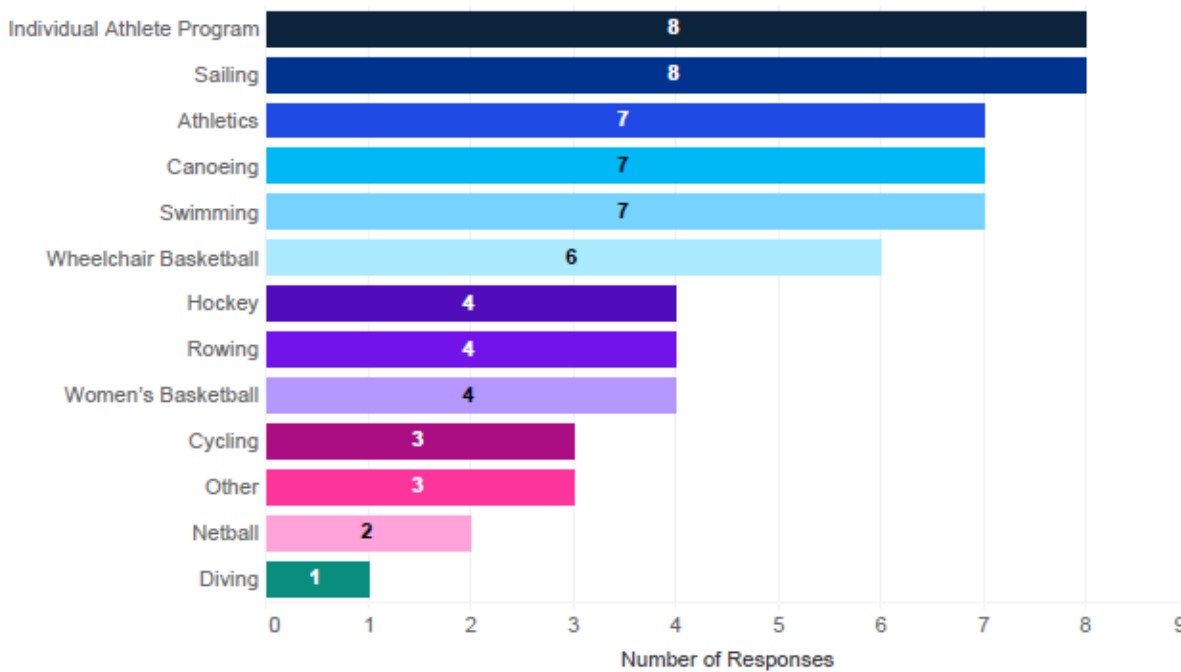
7.2.2.4 What area do you work in at WAIS?

Responses by participant group:



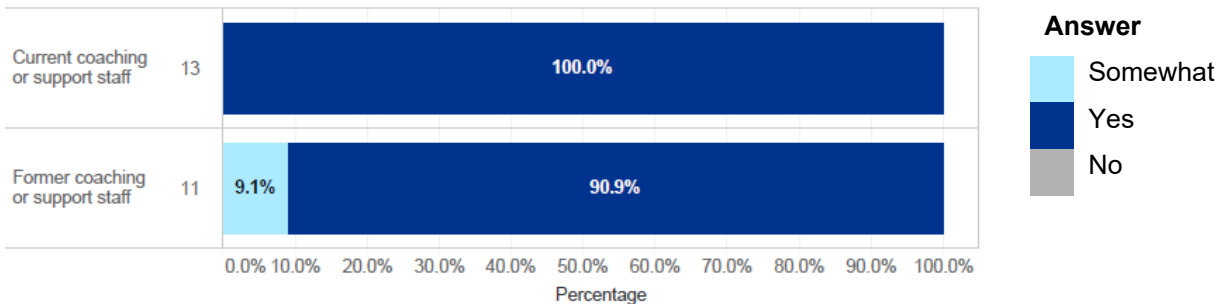
7.2.2.5 What sport do you engage with?

Count of respondents:



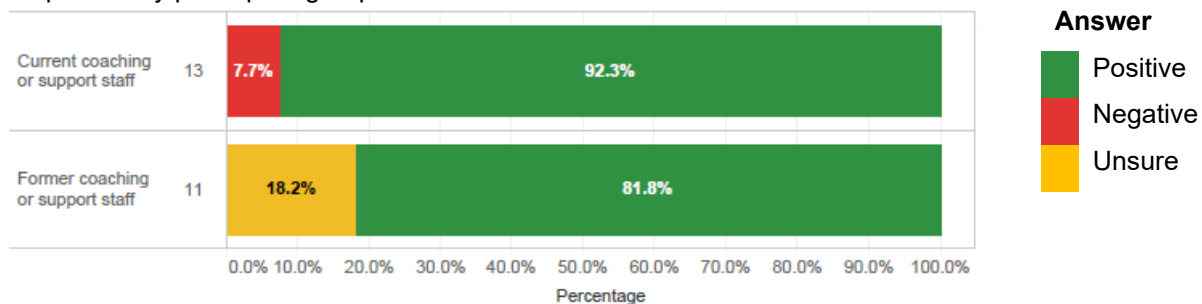
7.2.2.6 Do you understand what the term “athlete safety” means?

Responses by participant group:



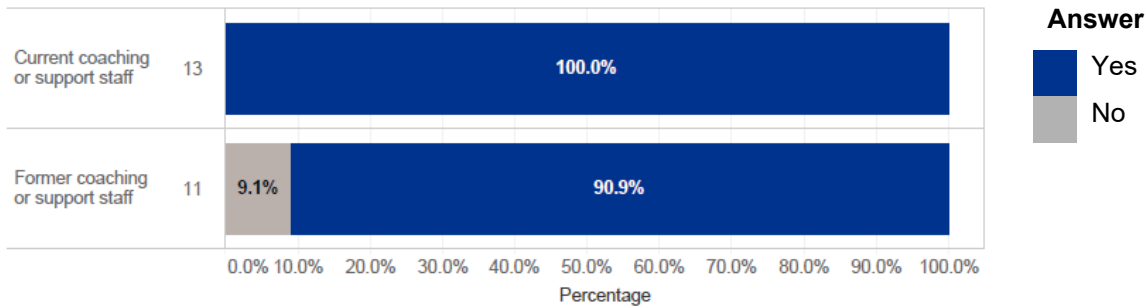
7.2.2.7 How would you best describe the athlete safety culture within your team, program, or practice? For the purpose of this survey ‘athlete safety’ refers to the wellbeing and protection of athletes from harm and abuse.

Responses by participant group:



7.2.2.8 Do you receive guidance about how to keep athletes safe?

Responses by participant group:



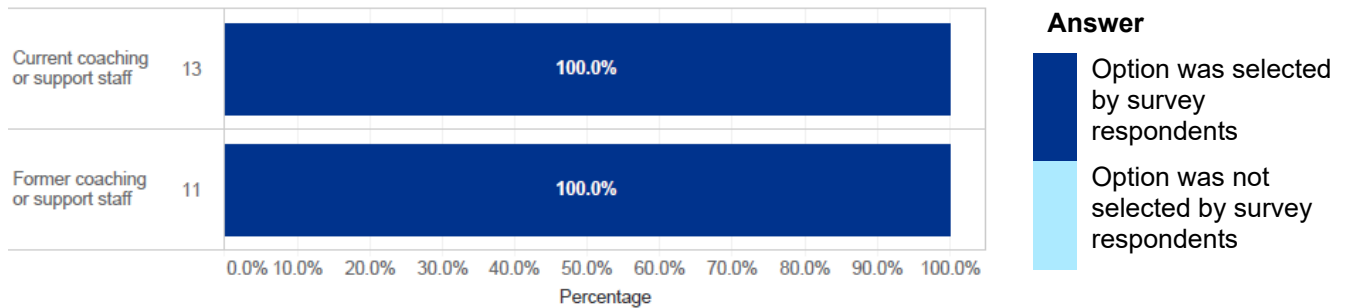
7.2.2.9 How are you informed about the rights of athletes to be safe from harm?

Respondents were able to select multiple options from the following list, results documented below.

- Informed by WAIS policies and procedures
- Informed by posters
- Informed by training/ guidance
- Informed by staff
- Other
- I have not been informed of athlete safety.

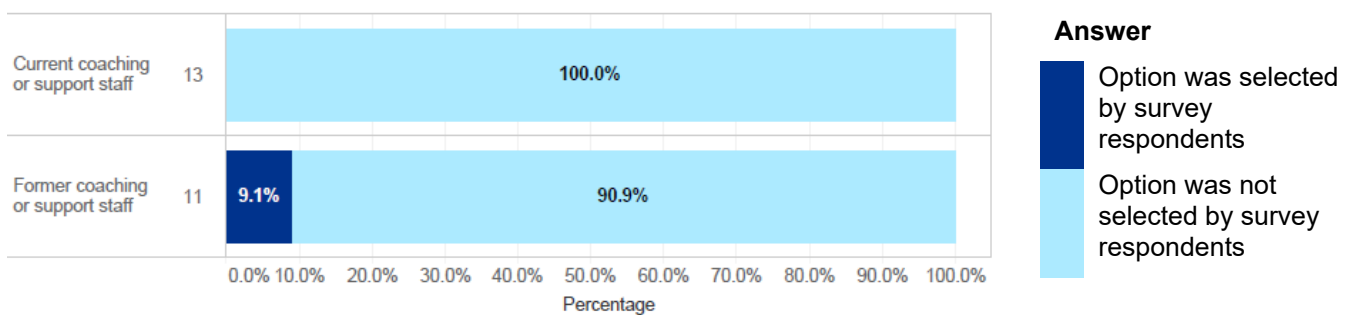
Informed by WAIS policies and procedures

Responses by participant group:



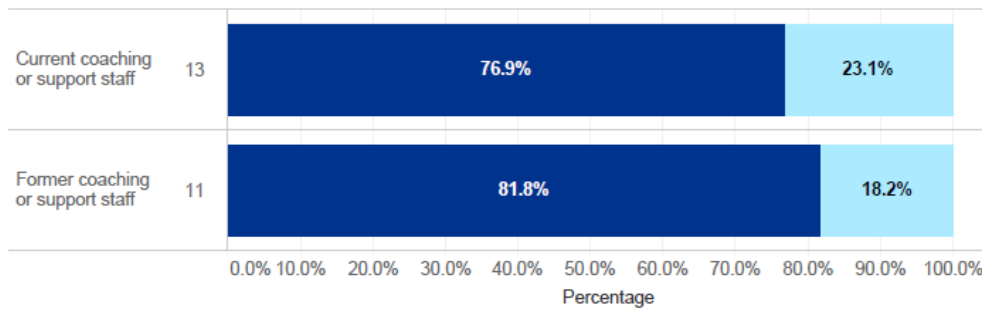
Informed by posters

Responses by participant group:



Informed by training/ guidance

Responses by participant group:

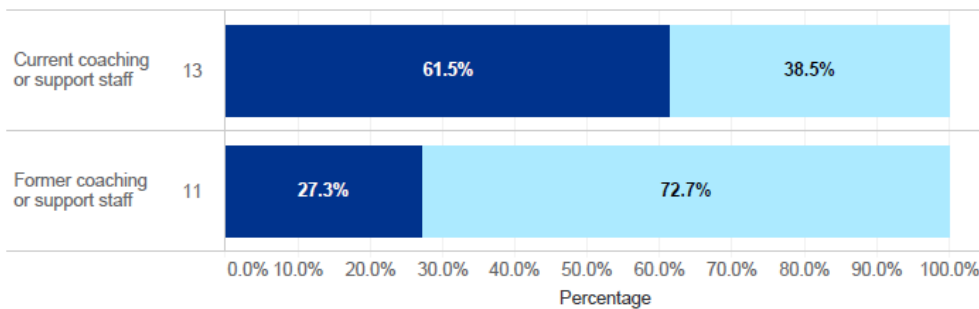


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Informed by staff

Responses by participant group:



Answer

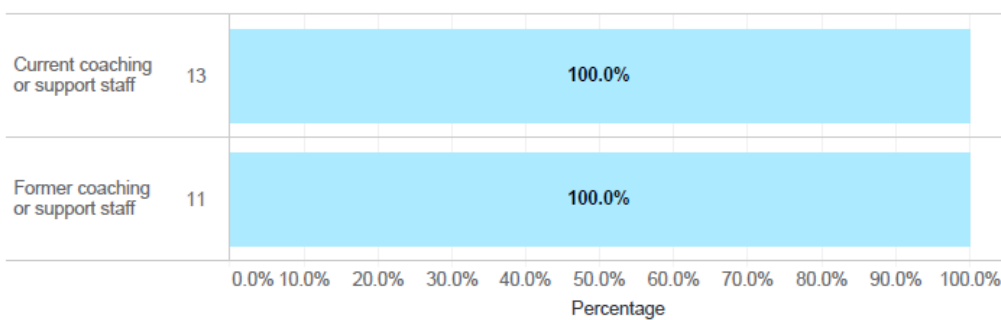
- Option was selected by survey respondents
- Option was not selected by survey respondents

Other

It is noted that one respondent stated that they received information through a medium 'other' than the prepopulated options presented. This participant advised that they receive information through Sport Integrity Australia.

I have not been informed about athlete safety and rights

Responses by participant group:

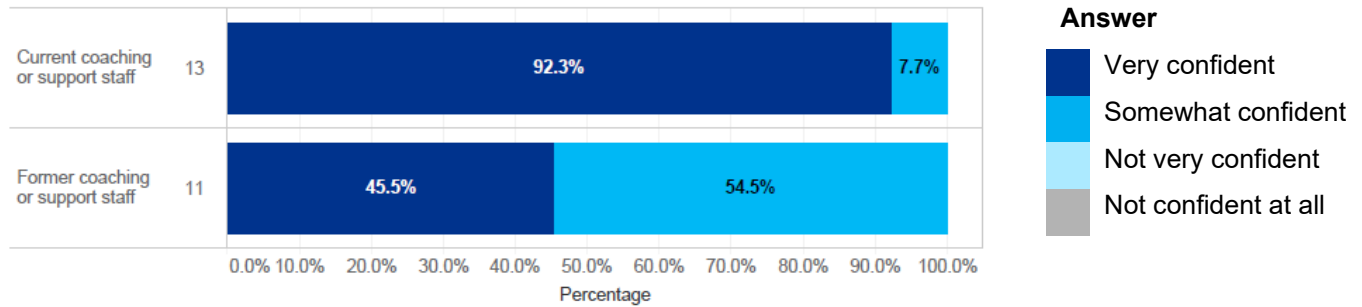


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

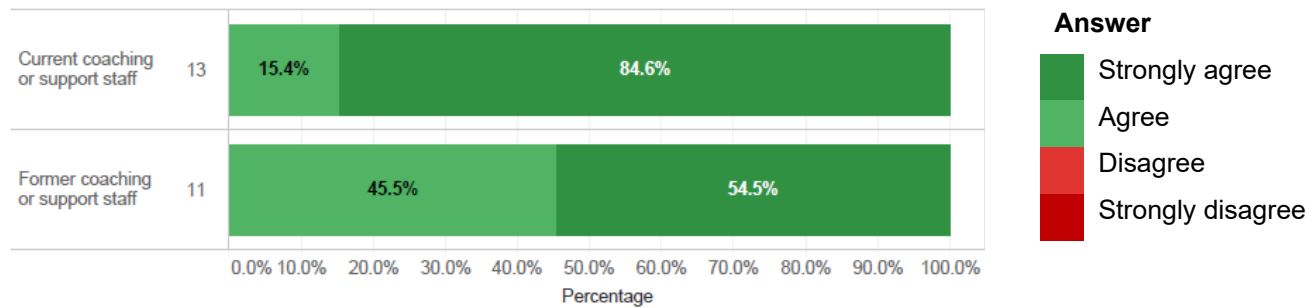
7.2.2.10 How would you rate your level of confidence in recognising safe and unsafe behaviour whilst at WAIS?

Responses by participant group:



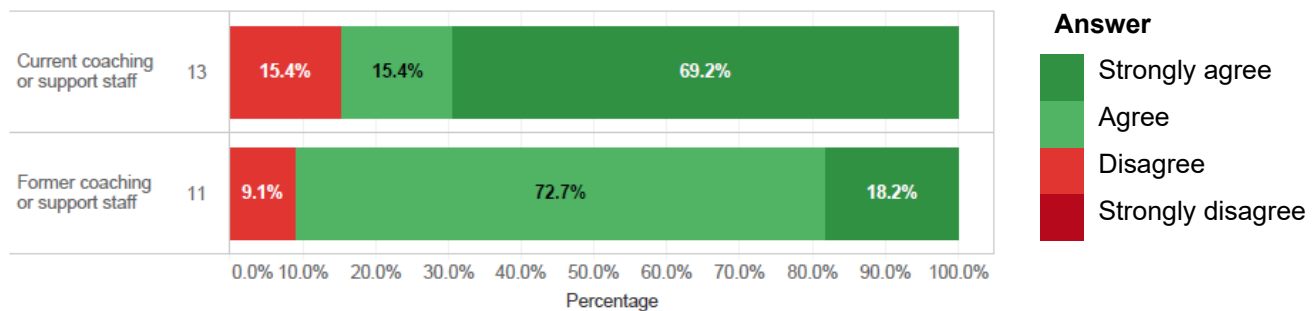
7.2.2.11 I am aware of policies and procedures which inform athlete safety and wellbeing at WAIS.

Responses by participant group:



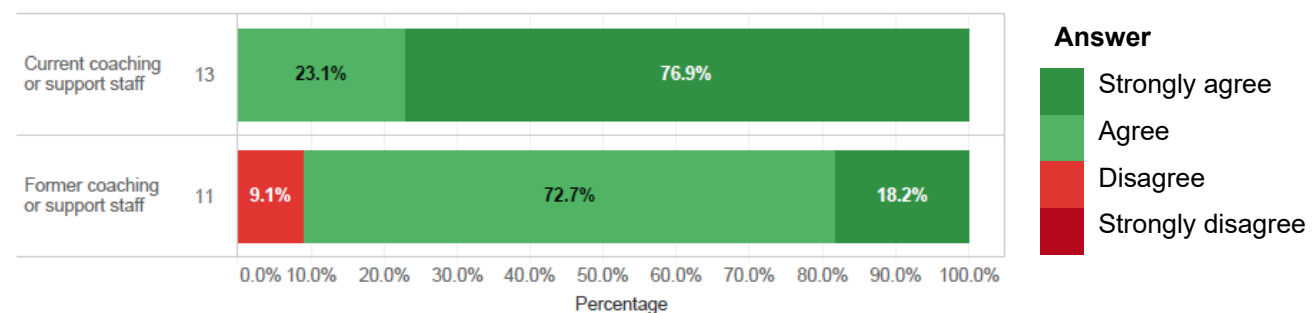
7.2.2.12 I believe the policies and procedures which inform athlete safety and wellbeing at WAIS are adhered to.

Responses by participant group:



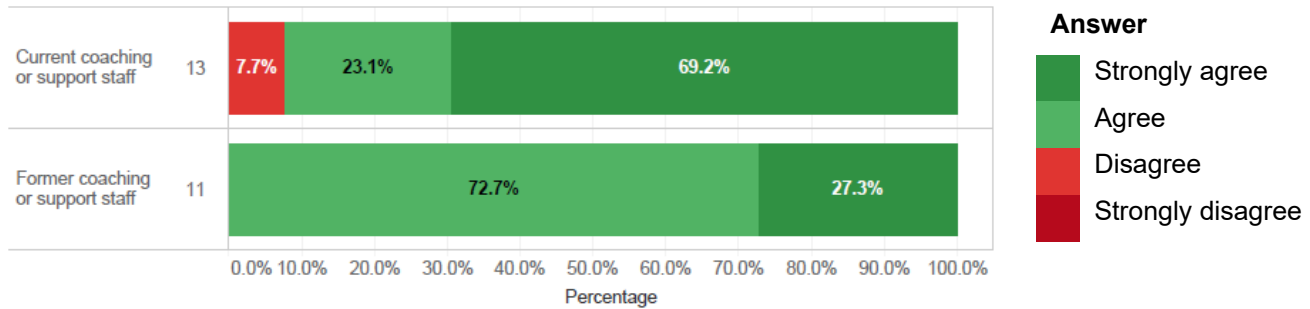
7.2.2.13 Training/information/guidance provided on athlete safety is useful for my role.

Responses by participant group:



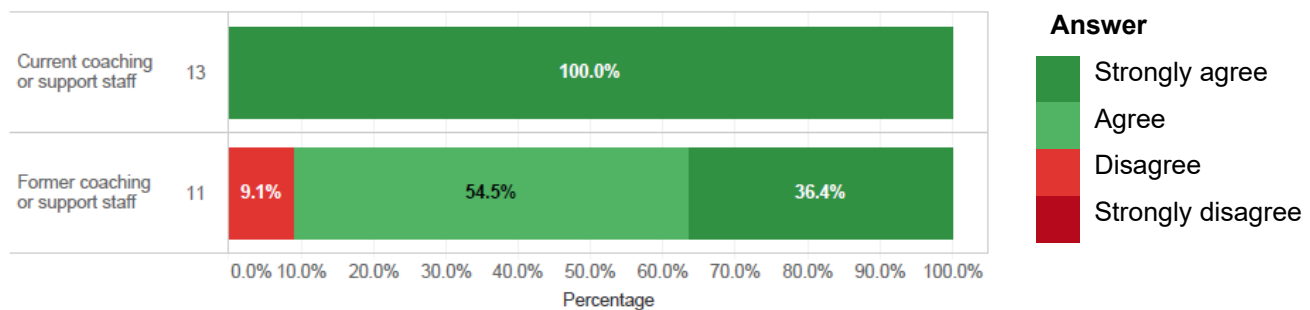
7.2.2.14 WAIS staff behave in a way that is consistent with the athlete safety and wellbeing information and guidance they receive.

Responses by participant group:



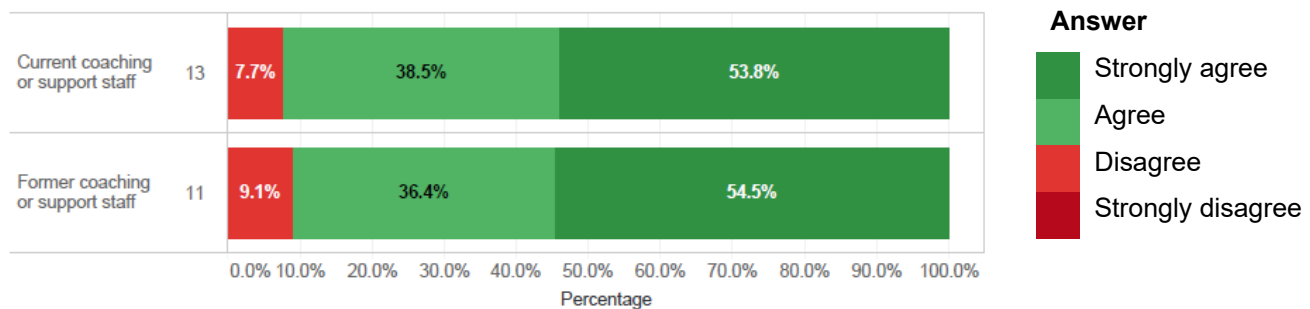
7.2.2.15 I understand my role in keeping athletes safe from harm and abuse.

Responses by participant group:



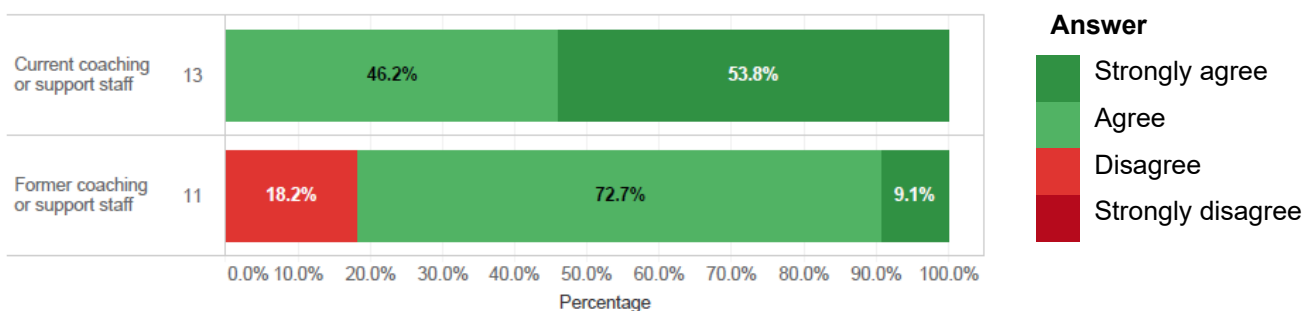
7.2.2.16 I believe there should be differing approaches to how child athletes and adult athletes are coached.

Responses by participant group:



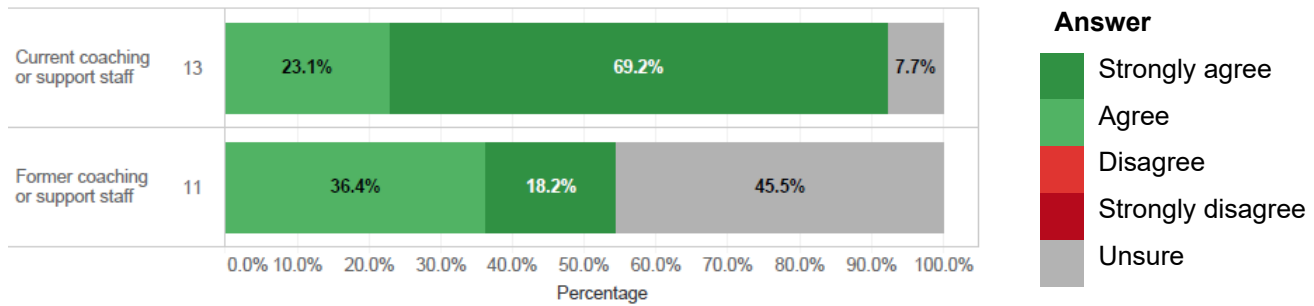
7.2.2.17 I feel WAIS provides adequate KPMG support to help me fulfill my roles and responsibilities relating to keeping athletes safe from harm and abuse.

Responses by participant group:



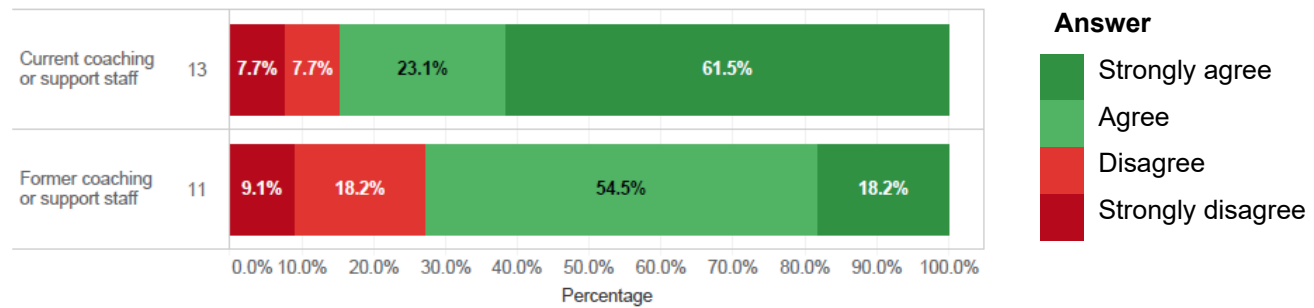
7.2.2.18 Athlete safety and wellbeing are included in WAIS' strategy and strategic documents.

Responses by participant group:



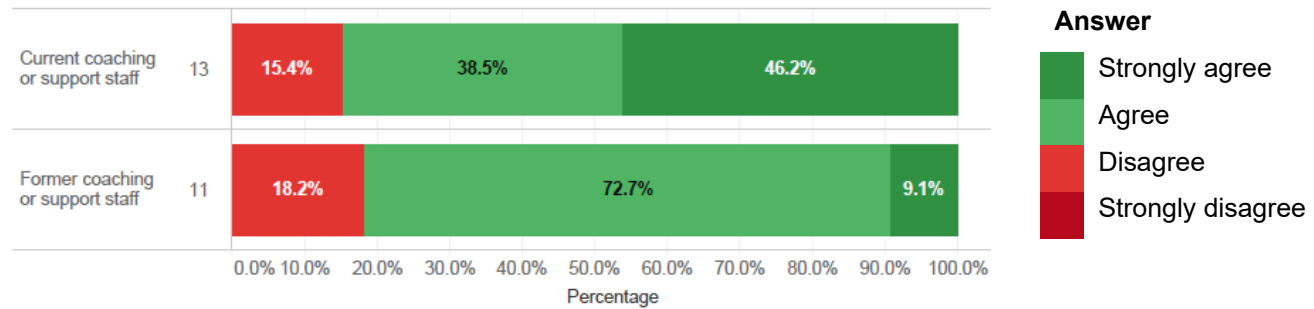
7.2.2.19 WAIS management, including WAIS Executive, model a culture which prioritises athlete safety at WAIS.

Responses by participant group:



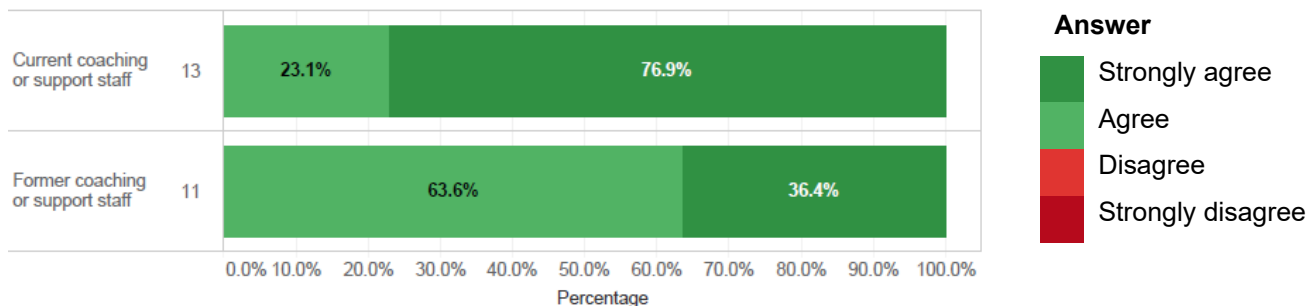
7.2.2.20 The WAIS Board model a culture which prioritises athlete safety at WAIS.

Responses by participant group:



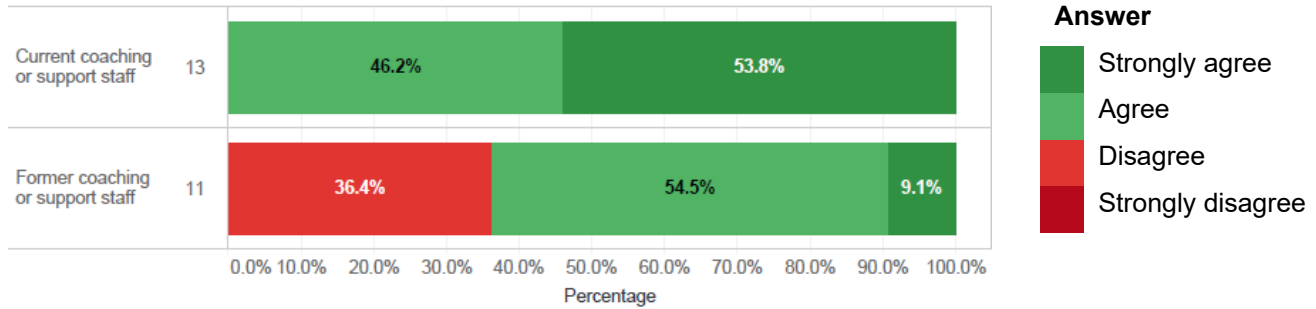
7.2.2.21 I understand how to identify risks to an athlete's safety and wellbeing.

Responses by participant group:



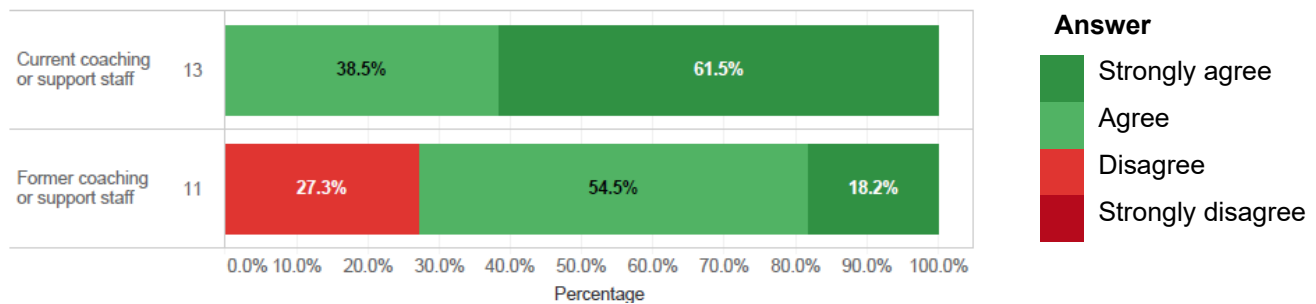
7.2.2.22 There is a process to document risks to an athlete’s safety and wellbeing.

Responses by participant group:



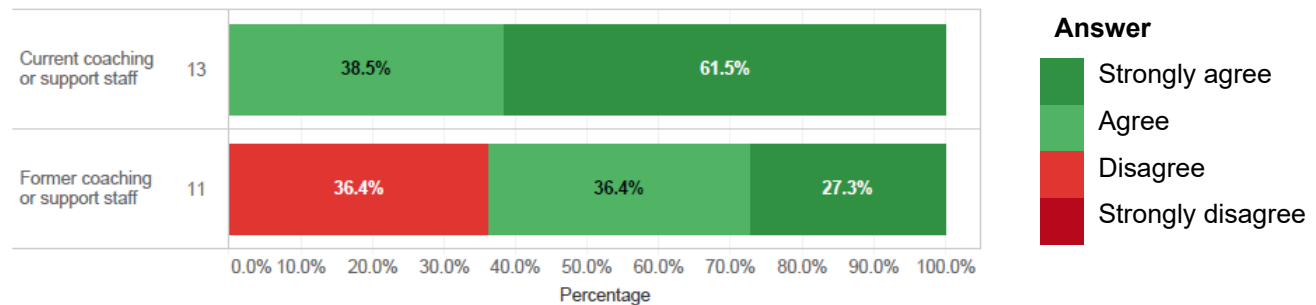
7.2.2.23 I understand what to do if I identify risks to an athlete’s safety and wellbeing in my environment.

Responses by participant group:



7.2.2.24 I believe I have the skills to recognise and respond to the safety and wellbeing concerns of athletes with diverse needs such as athletes with disability, mental health challenges, gender and sexual identity or cultural and ethnic diversity.

Responses by participant group:



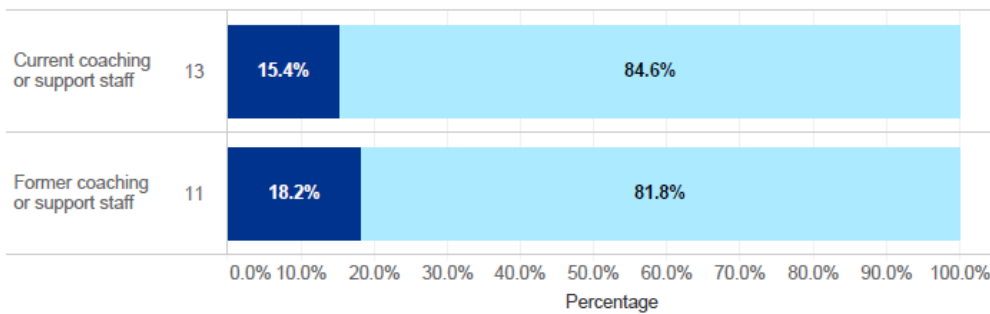
7.2.2.25 Have you ever felt an athlete was unsafe because of any of the following?

Respondents were asked to select all that apply from the following options, results documented below.

- I felt they were bullied
- I felt they were harassed
- I felt they were body/weight shamed
- I felt they were threatened physically
- I felt they were threatened emotionally
- I felt they might injury themselves
- I felt they were forced to overtrain
- I felt they were being forced to train with injuries
- They were given physical punishments
- I felt they would be punished if they did not meet their coach's expectations
- I felt they were uncomfortable around a WAIS staff member
- I felt uncomfortable around medical staff
- I felt they were uncomfortable around another athlete
- I felt they were uncomfortable around another parent or spectator
- I felt they were getting unwanted attention
- I felt they were getting inappropriate attention
- I felt they were inappropriately touched
- I felt they were having an inappropriate relationship with someone who wanted something from them
- I felt they were isolated from the world outside their sport
- Other
- I don't feel like athletes were unsafe at WAIS.

Respondents felt athletes were bullied

Responses by participant group:

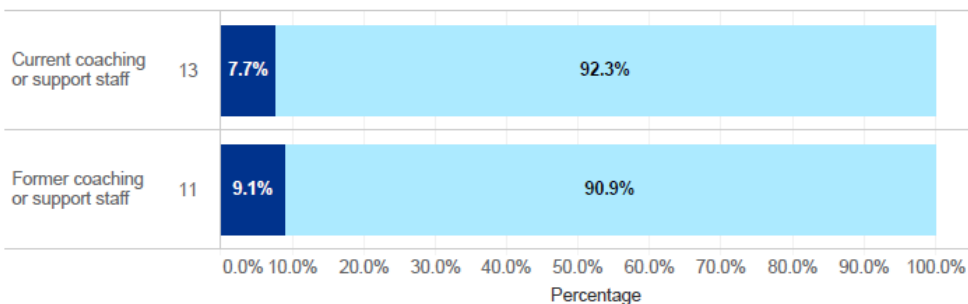


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were harassed

Responses by participant group:

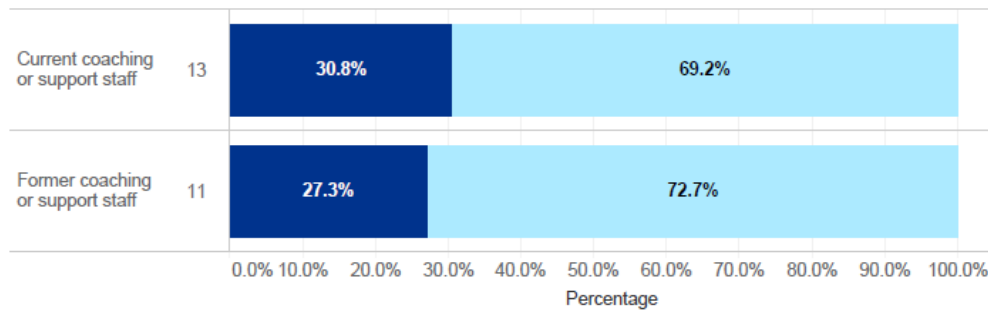


Answer

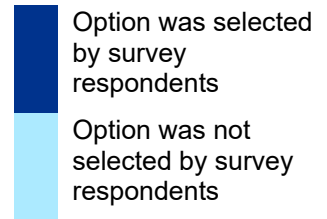
- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were body shamed / weight shamed

Responses by participant group:

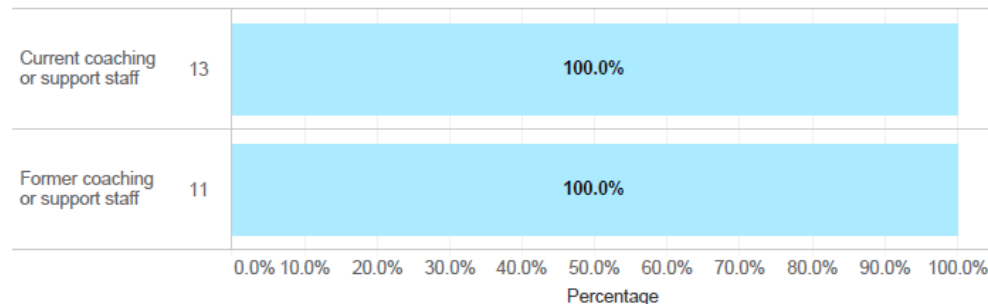


Answer

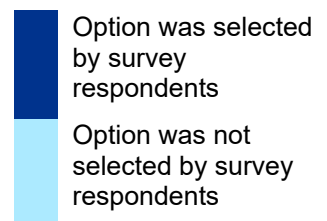


Respondents felt athletes were threatened physically

Responses by participant group:

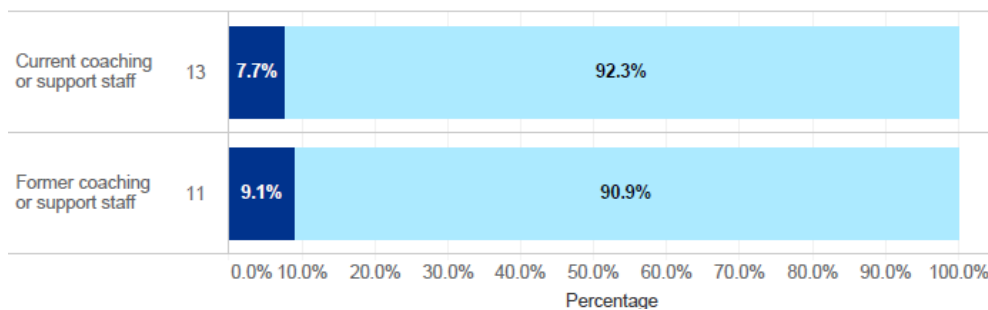


Answer

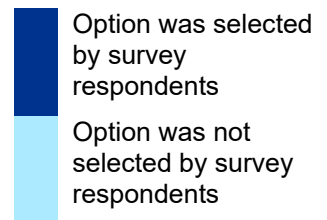


Respondents felt athletes were threatened emotionally

Responses by participant group:

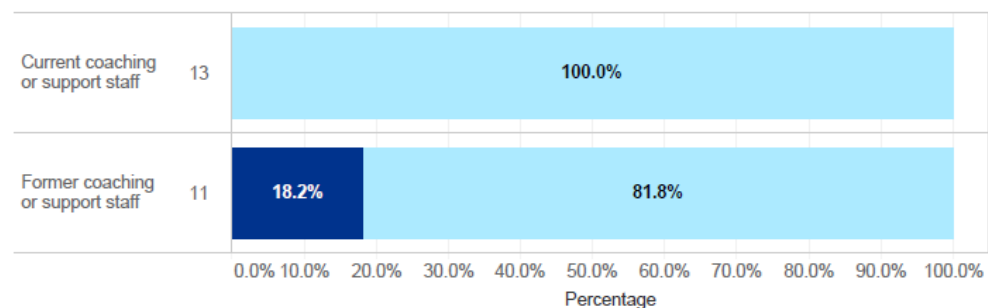


Answer

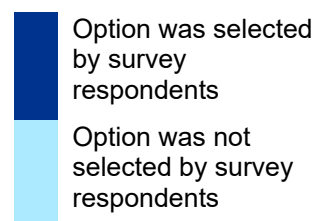


Respondents felt athletes might injure themselves

Responses by participant group:

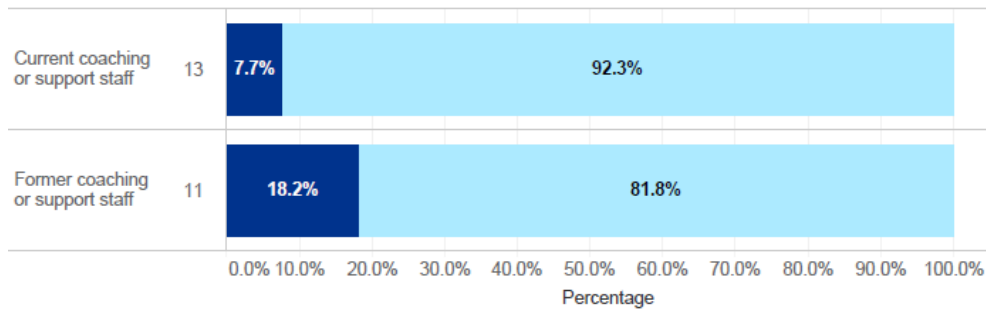


Answer



Respondents felt athletes were forced to overtrain

Responses by participant group:

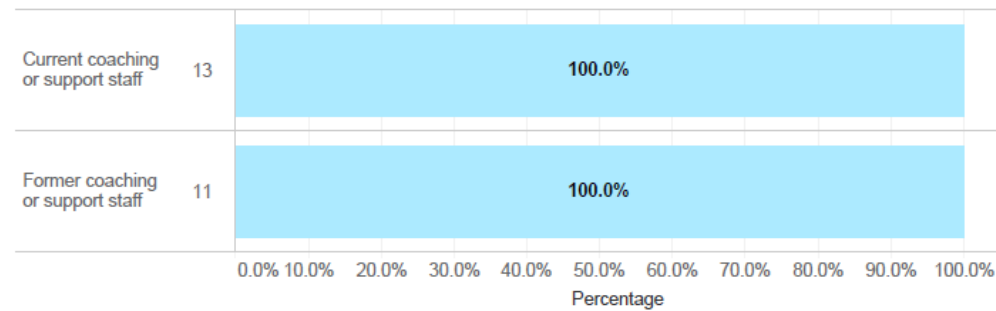


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were forced to train with injuries

Responses by participant group:

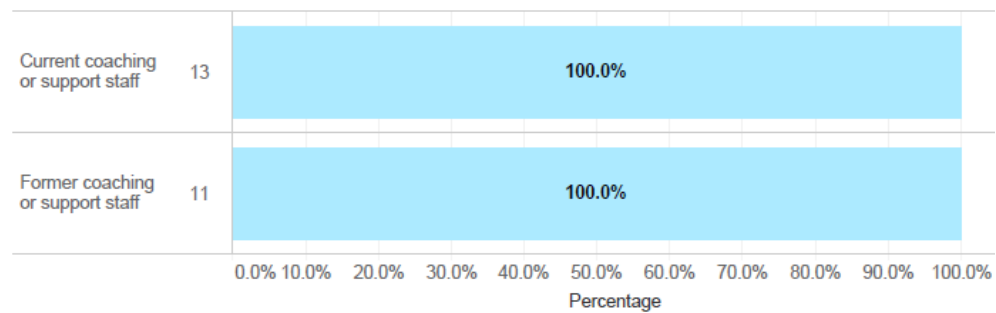


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were given physical punishments

Responses by participant group:

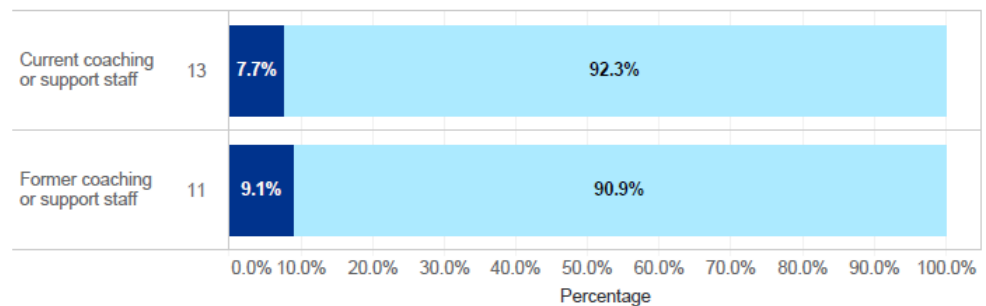


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were punished if they did not meet their coaches expectations

Responses by participant group:

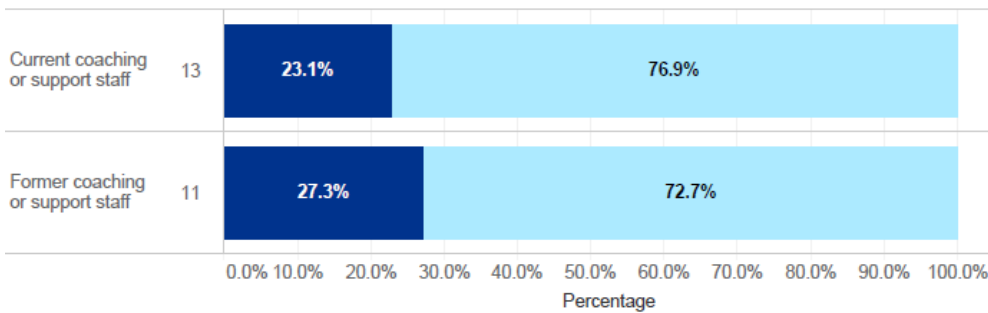


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around a WAIS staff member

Responses by participant group:

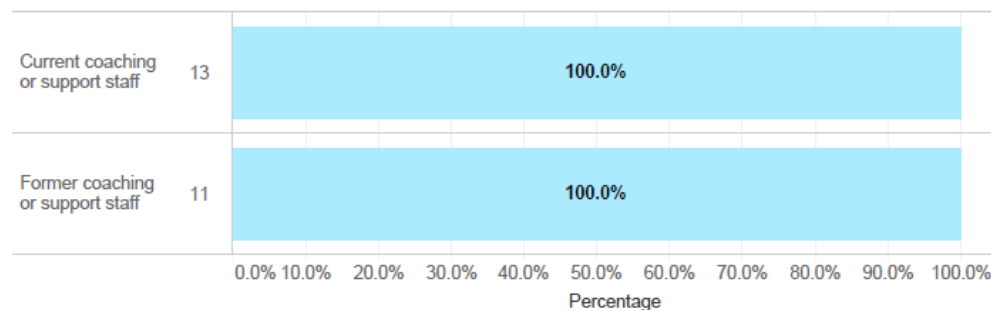


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around WAIS medical staff

Responses by participant group:

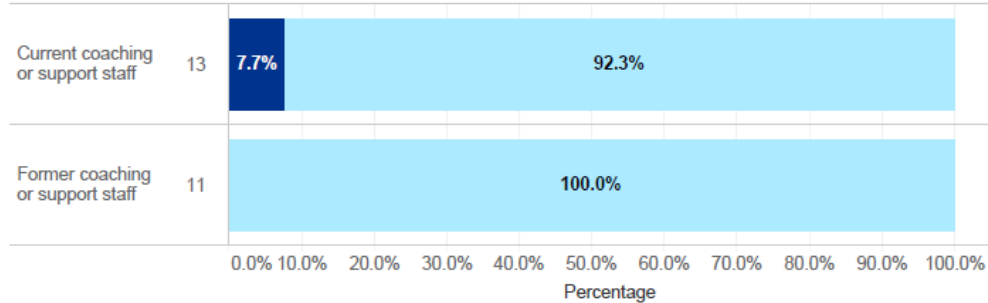


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around another athlete

Responses by participant group:

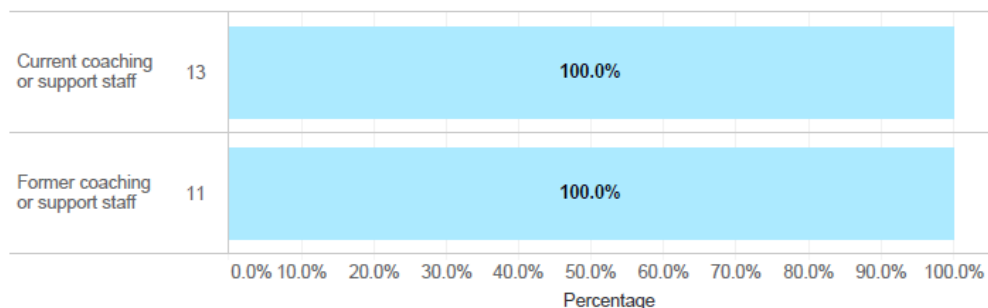


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around a parent or spectator

Responses by participant group:

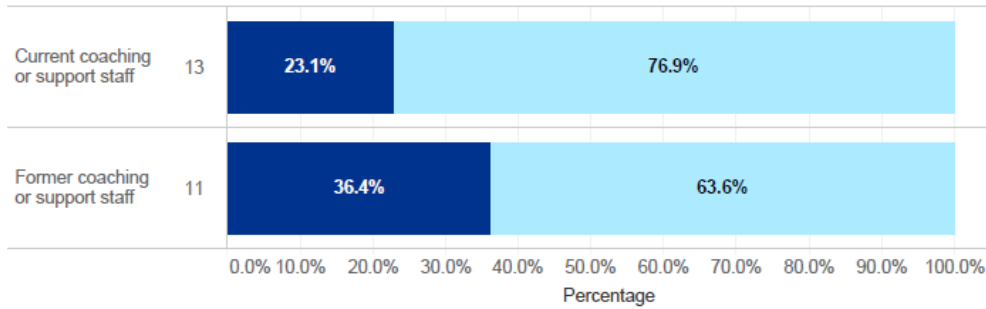


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were getting unwanted attention

Responses by participant group:

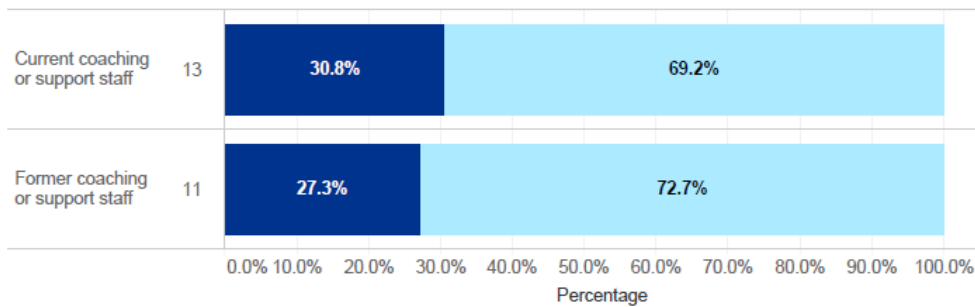


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were getting inappropriate attention

Responses by participant group:

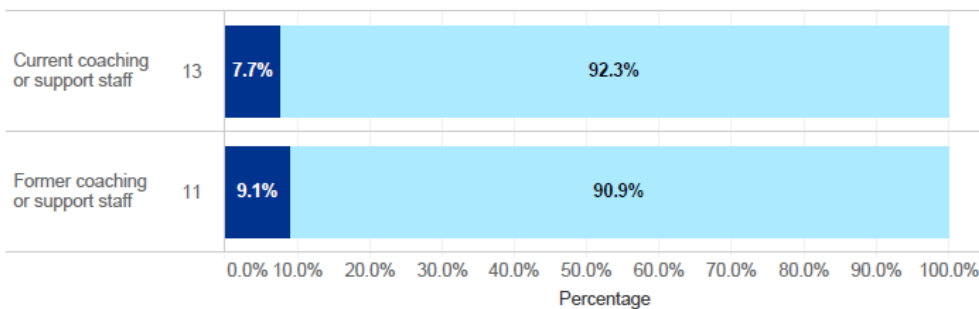


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were inappropriately touched

Responses by participant group:

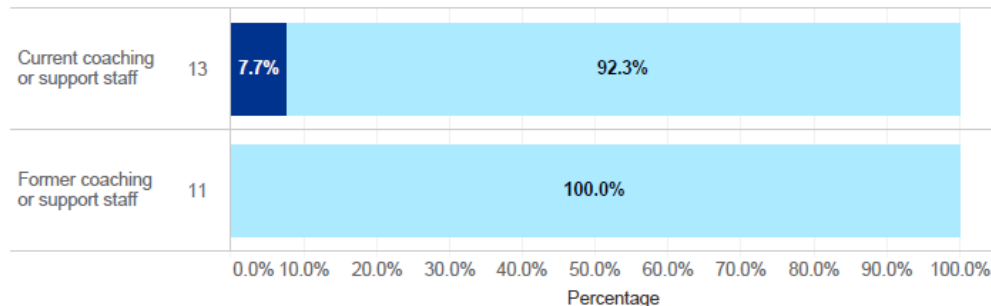


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were in an inappropriate relationship with someone who wanted something from them

Responses by participant group:

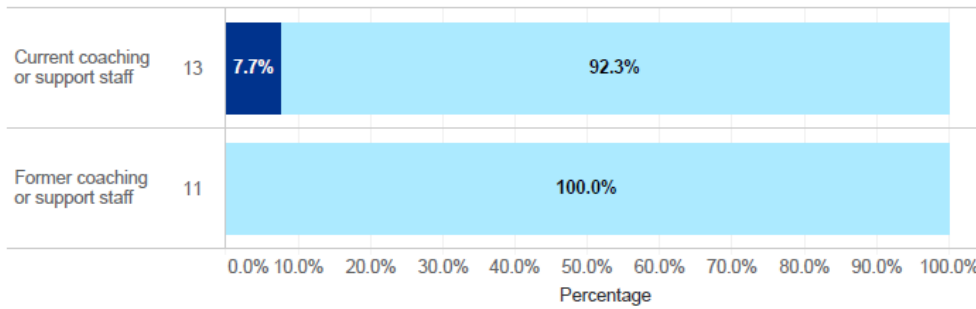


Answer

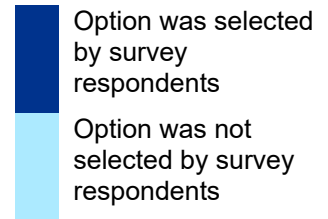
- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were isolated from the world outside of sport

Responses by participant group:



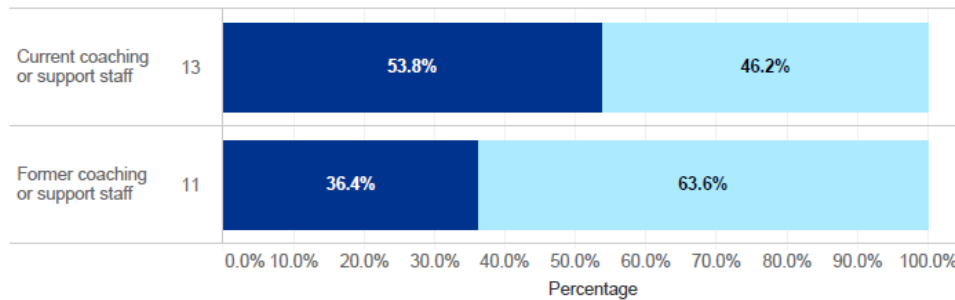
Answer



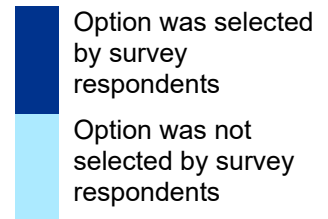
Other: It is noted that one respondent stated that they felt an athlete was an unsafe through a scenario 'other' than the prepopulated options presented. This participant indicated that they felt an athlete was unsafe because they were verbally abused.

I don't feel athletes are unsafe at WAIS

Responses by participant group:

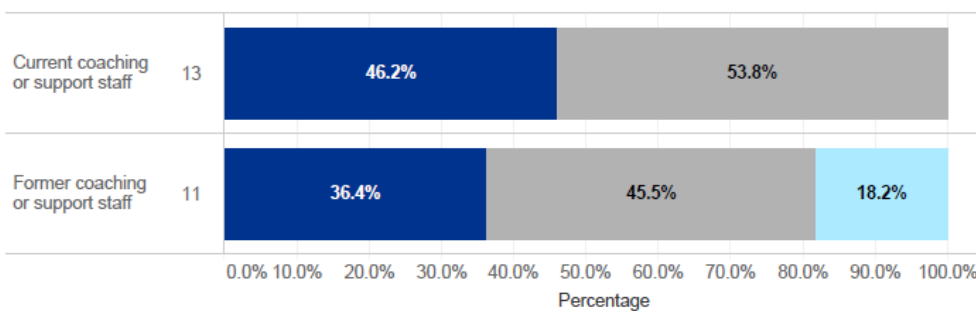


Answer

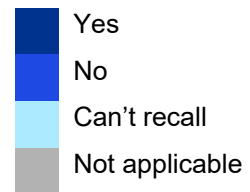


7.2.2.26 When you felt an athlete was unsafe did you tell someone, or talk to someone?

Responses by participant group:



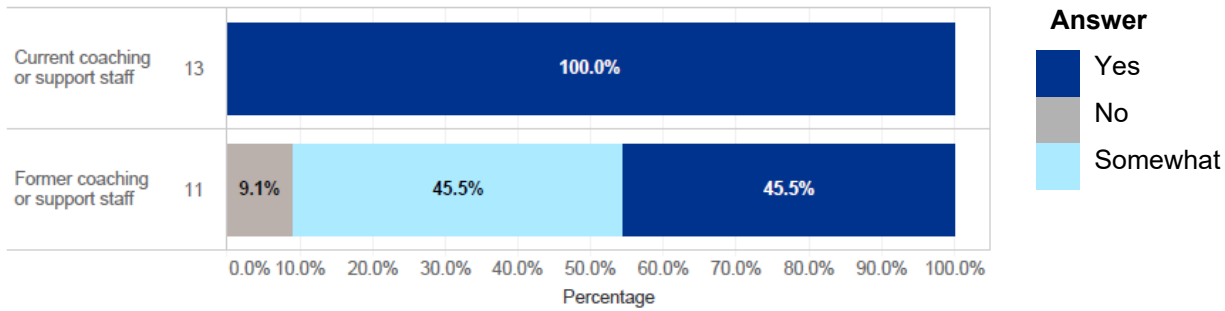
Answer



Note. Respondents who indicated feeling unsafe at WAIS to 7.2.2.25 were prompted to answer this question. Those who reported that neither they nor their family members have felt unsafe at WAIS were recorded as 'not applicable.'

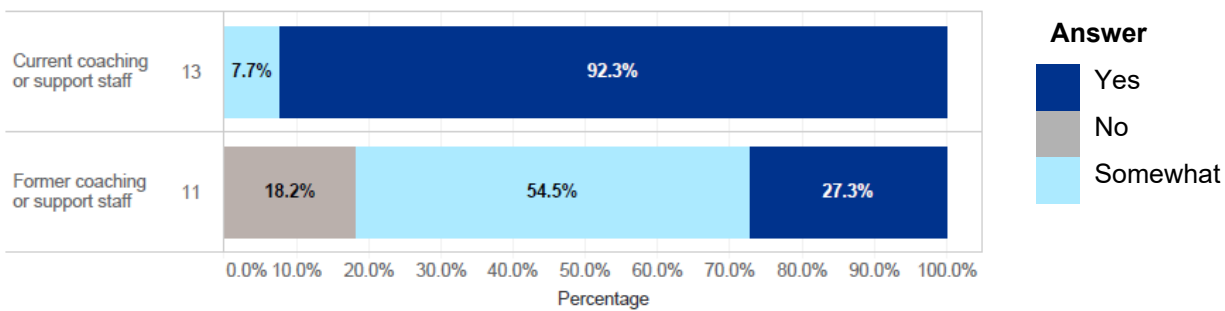
7.2.2.27 Do you know how to raise complaints about athlete safety and wellbeing?

Responses by participant group:



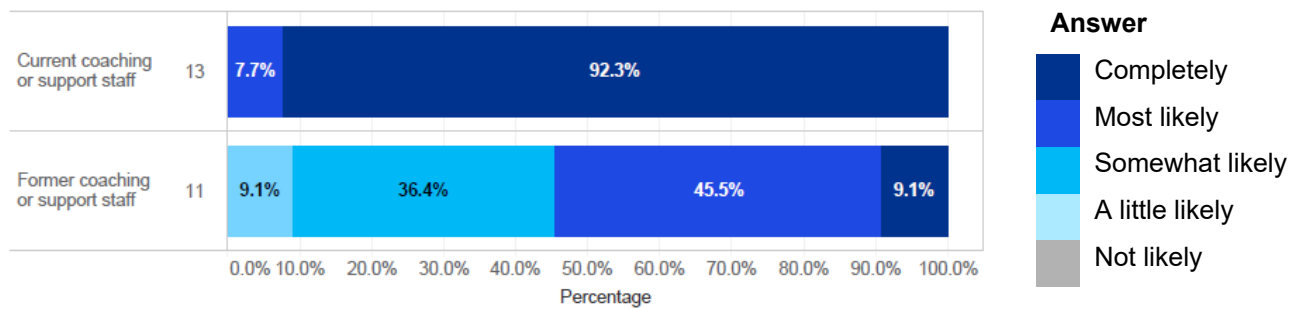
7.2.2.28 Has WAIS told you how to raise a complaint if you, or someone you know, is unsafe?

Responses by participant group:



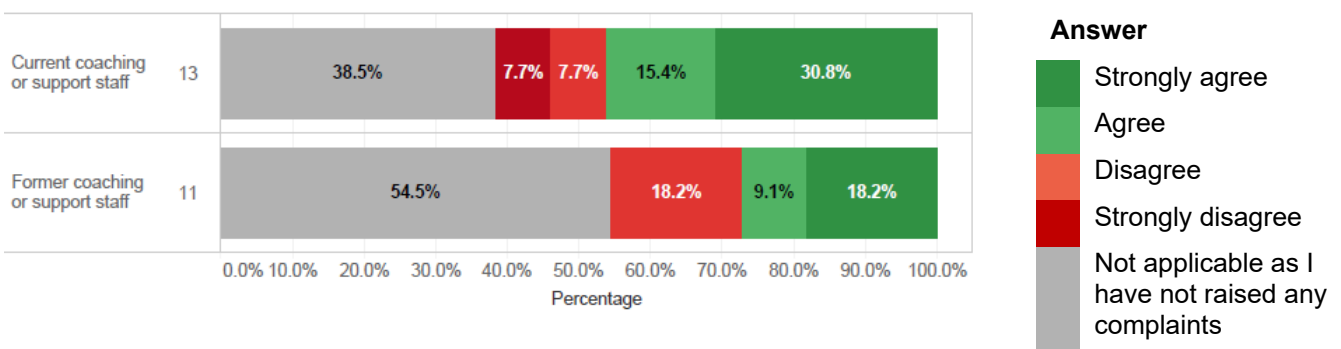
7.2.2.29 How likely are you to raise complaints if you have a problem about athlete safety and wellbeing?

Responses by participant group:



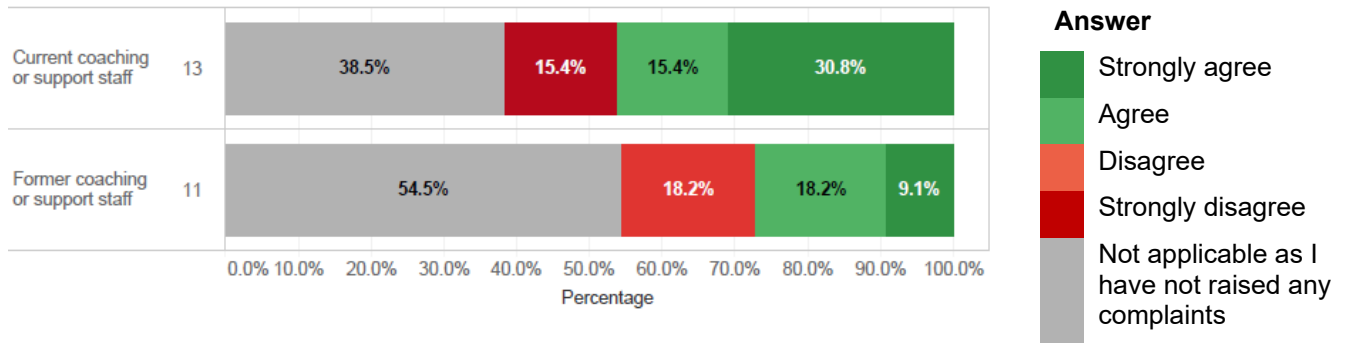
7.2.2.30 When I have previously raised complaints, I felt it was addressed by WAIS in a timely manner.

Responses by participant group:



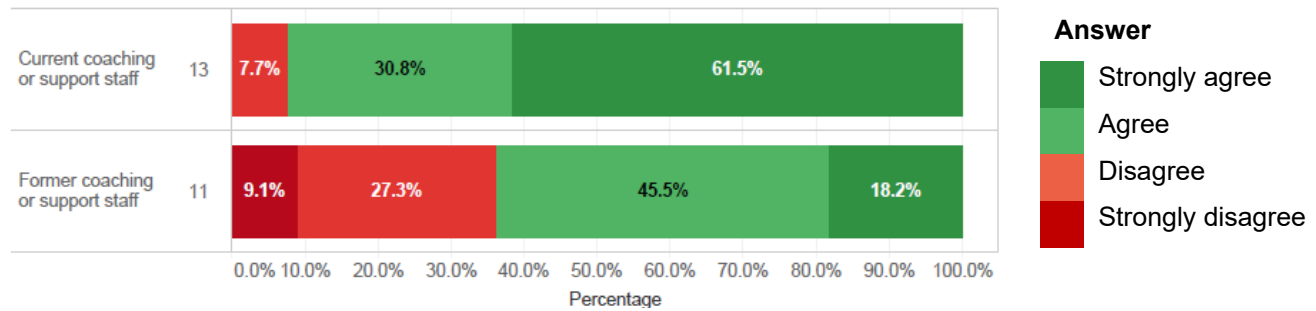
7.2.2.31 When I have previously raised a complaint, I felt WAIS responded appropriately.

Responses by participant group:



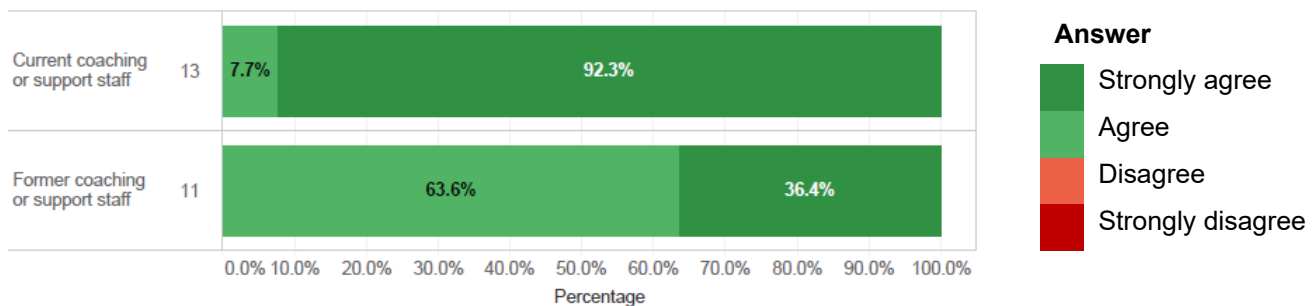
7.2.2.32 Leaders at WAIS encourage me to raise complaints about athlete safety and wellbeing.

Responses by participant group:



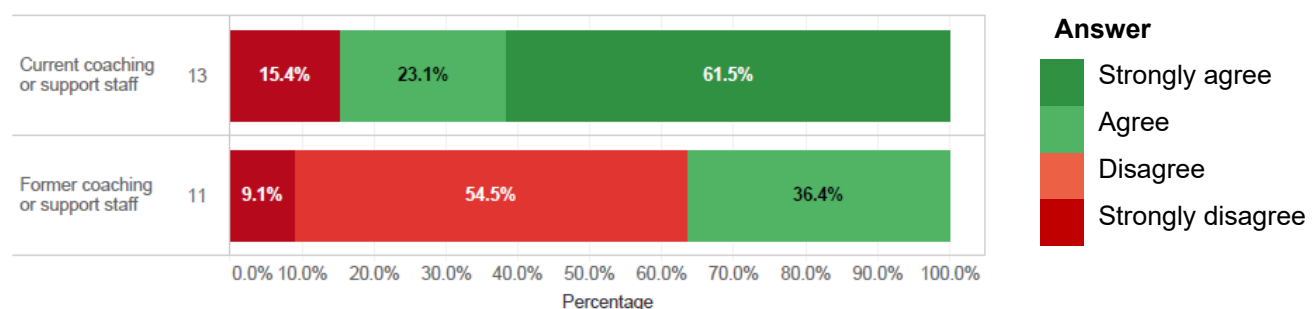
7.2.2.33 I understand what safe and unsafe behaviours are, and as they relate to athlete safety and wellbeing.

Responses by participant group:



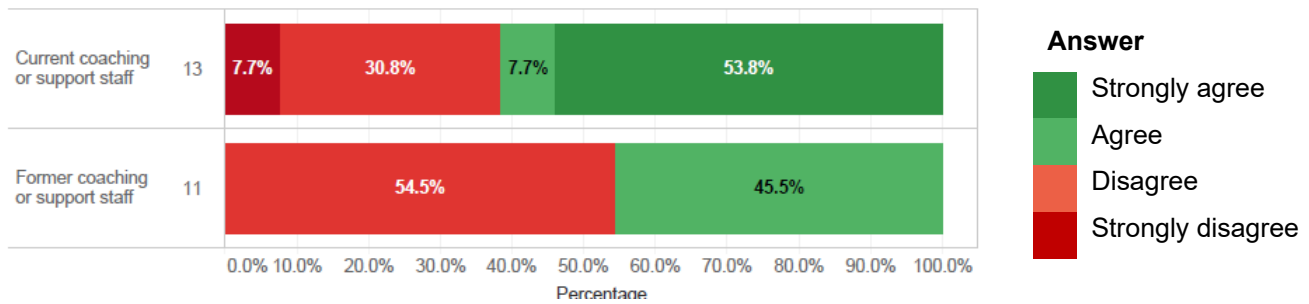
7.2.2.34 I believe people at WAIS are held accountable for their actions.

Responses by participant group:



7.2.2.35 Inappropriate behaviour is sanctioned at WAIS.

Responses by participant group:

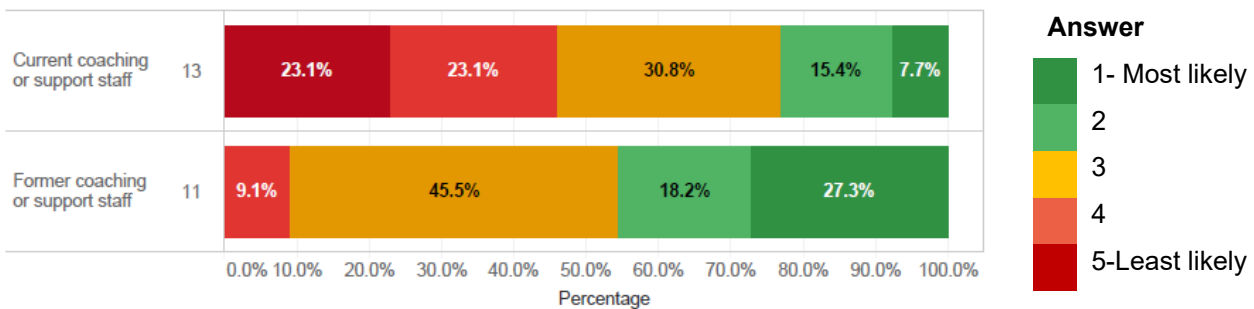


7.2.2.36 We would like to understand what you think WAIS believes are the most important factors in sport.

Coaching and support staff were asked to rank the below factors in order of importance according to what they believe WAIS values, with 1 being the most important and 5 being the least important.

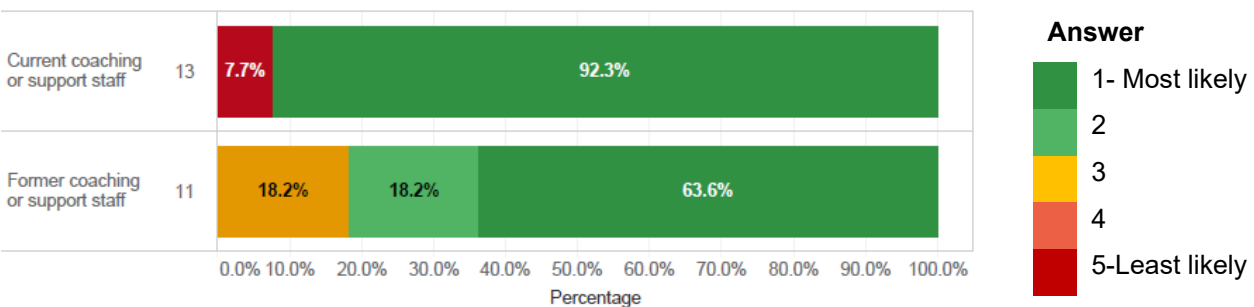
High Performance

Responses by participant group:



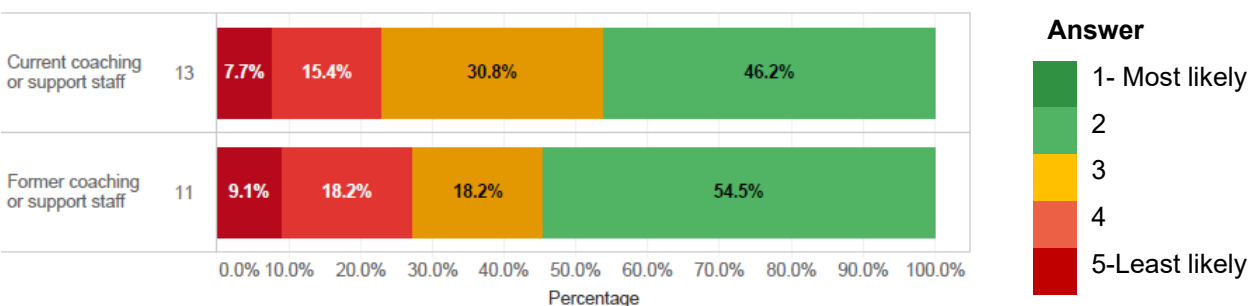
Athlete safety

Responses by participant group:



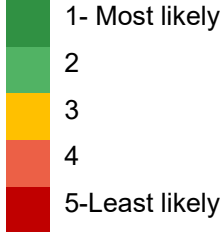
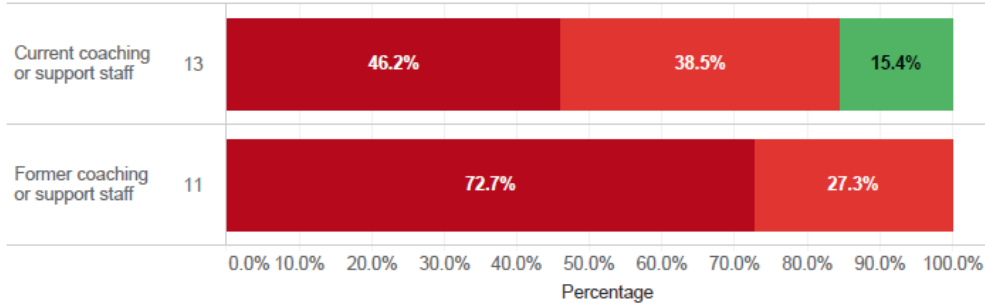
Athlete happiness

Responses by participant group:



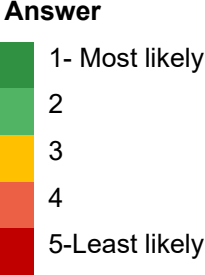
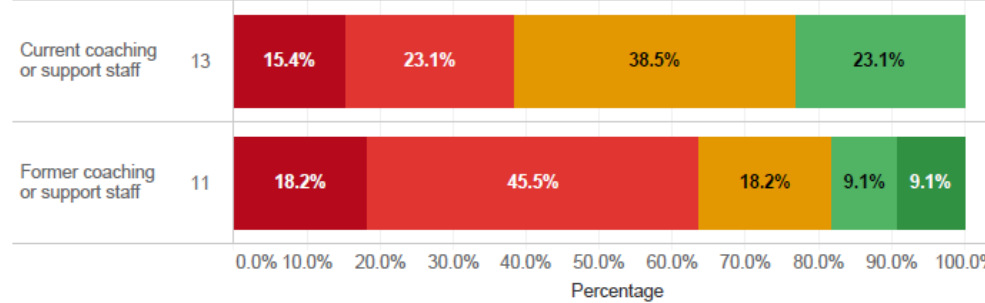
Physical fitness

Responses by participant group:



Personal development

Responses by participant group:



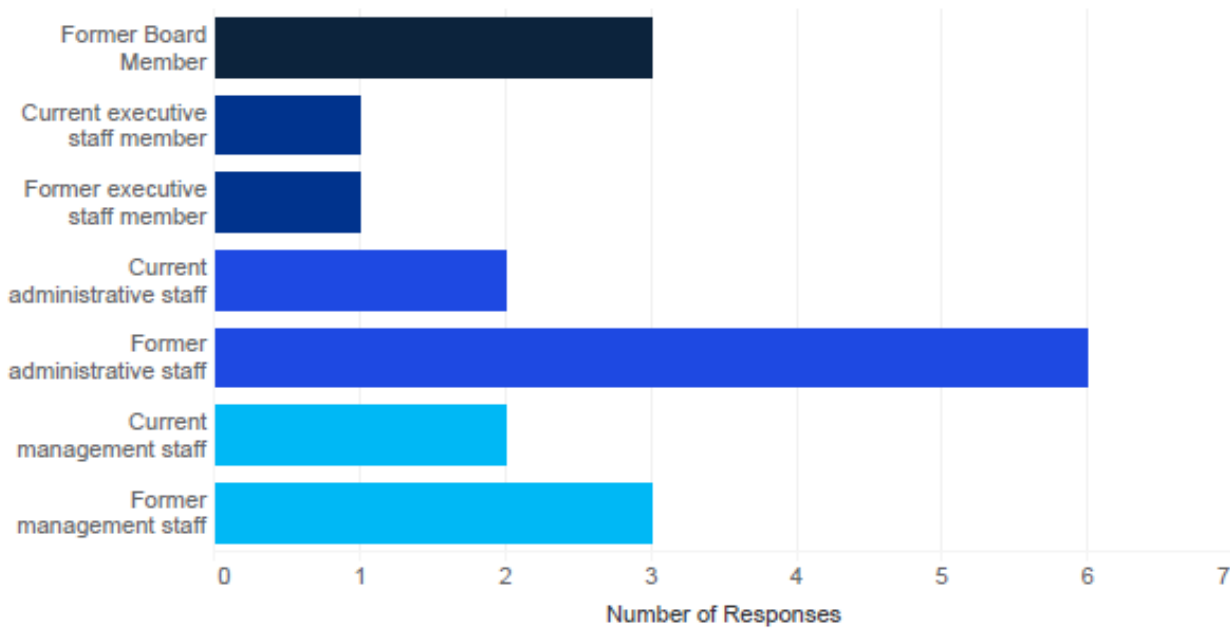
7.2.3 Administrative staff, management and WAIS Board survey results

Current and former administrative staff, management and WAIS Board members involved with WAIS during the Review period were eligible to complete a survey. Only former WAIS Board members responded to the survey and therefore current WAIS Board members are not included in the results.

Questions and results are documented below.

7.2.3.1 Please choose the option that best reflects your current role

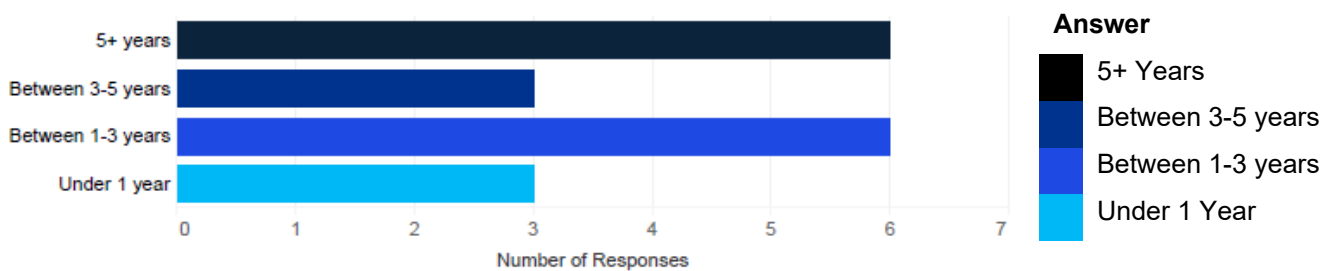
Count of respondents:



7.2.3.2 What year did you last work at WAIS (including being engaged as a Board member)?

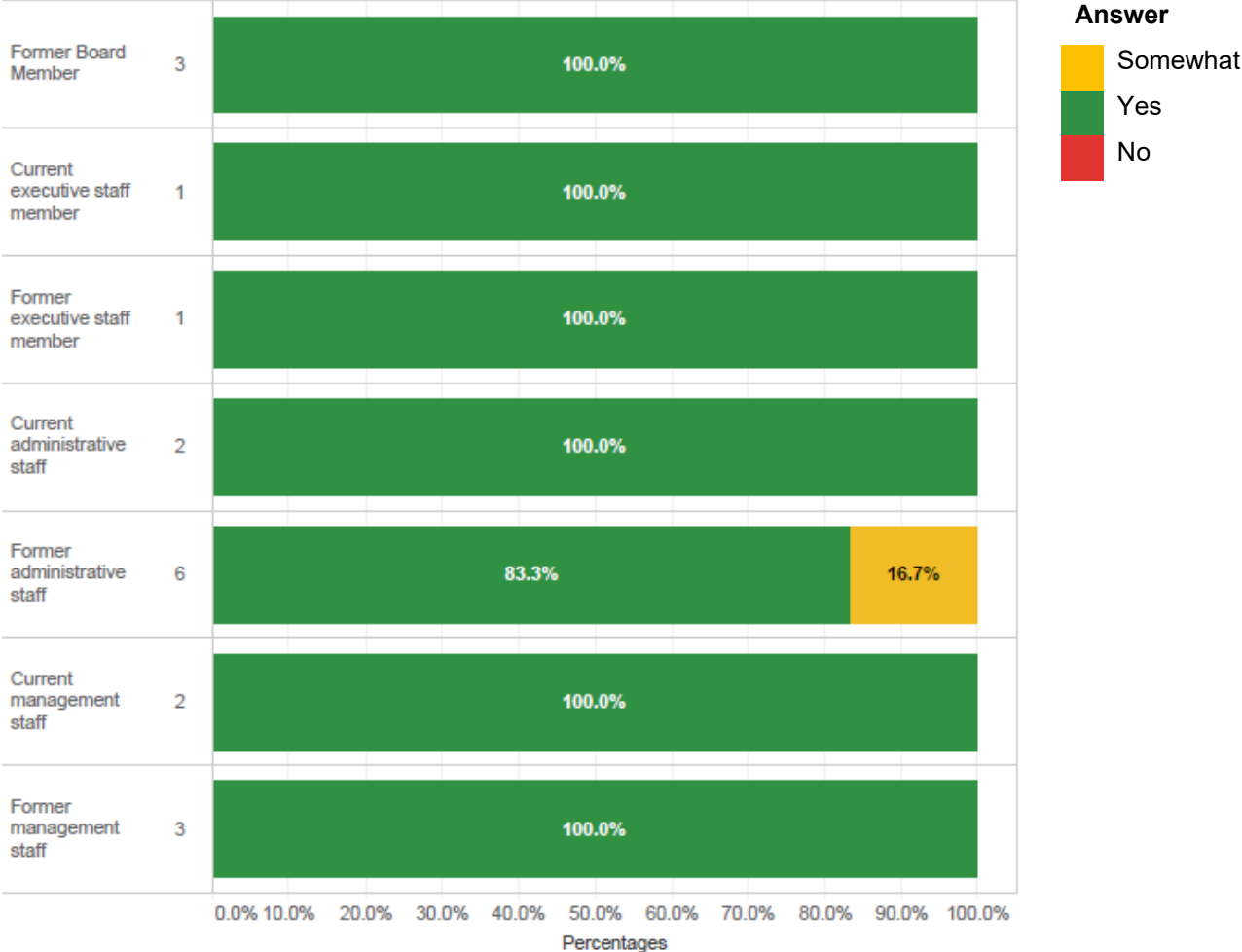
The survey was only to be completed by participants who were involved with WAIS within the last 5 years (the Review period). Those who selected a date and time prior to April 2019 did not complete the survey.

7.2.3.3 How long were you employed at WAIS or a member of the Board?



7.2.3.4 Do you understand what the term “athlete safety” means?

Responses by participant group:



Former WAIS Board members were also asked if they understood the term athlete safeguarding, all former WAIS Board members answered yes.

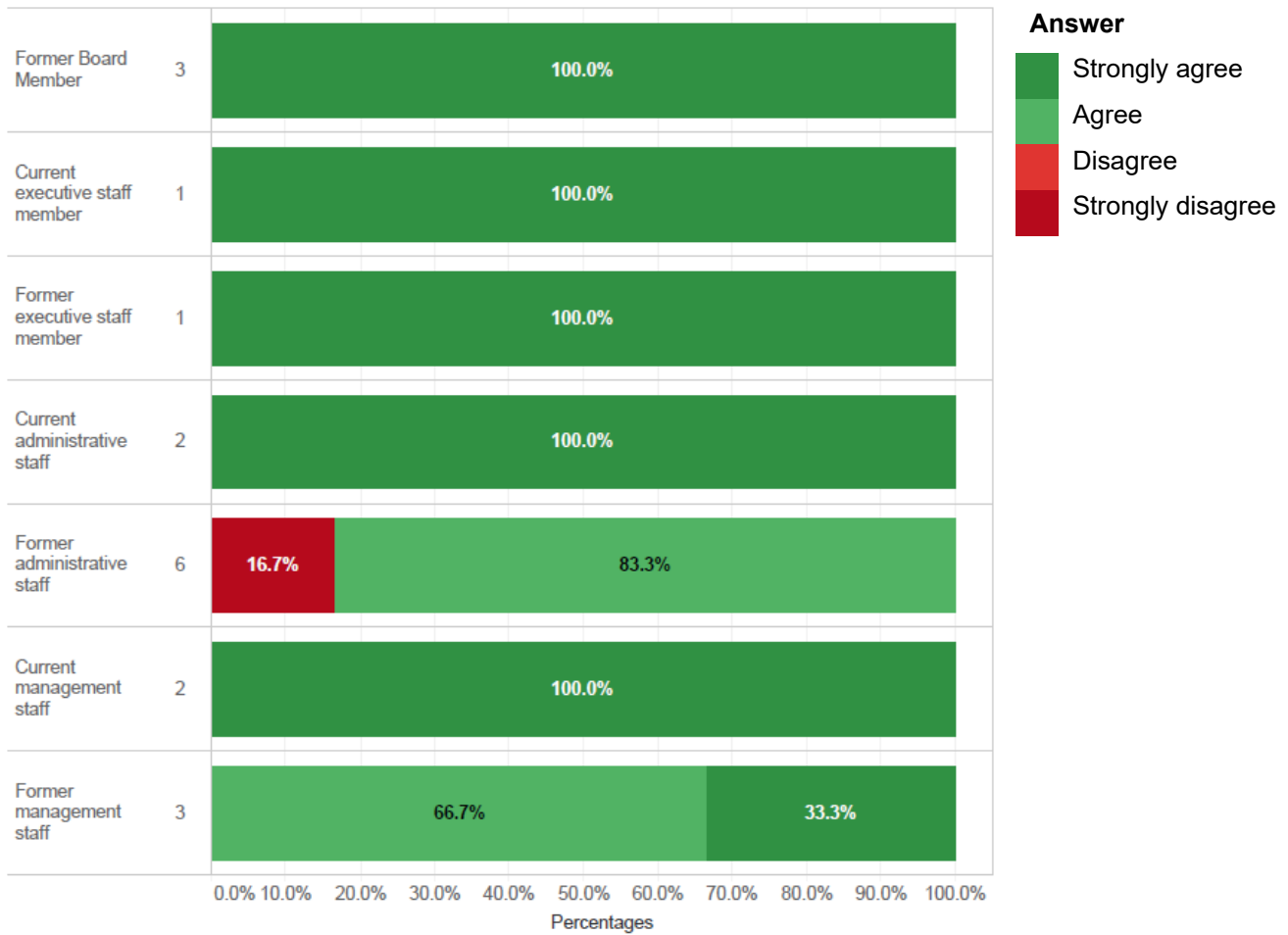
7.2.3.5 How would you best describe the athlete safety culture within your team, program, or practice? For the purpose of this survey ‘athlete safety’ refers to the wellbeing and protection of athletes from harm and abuse.

Responses by participant group:



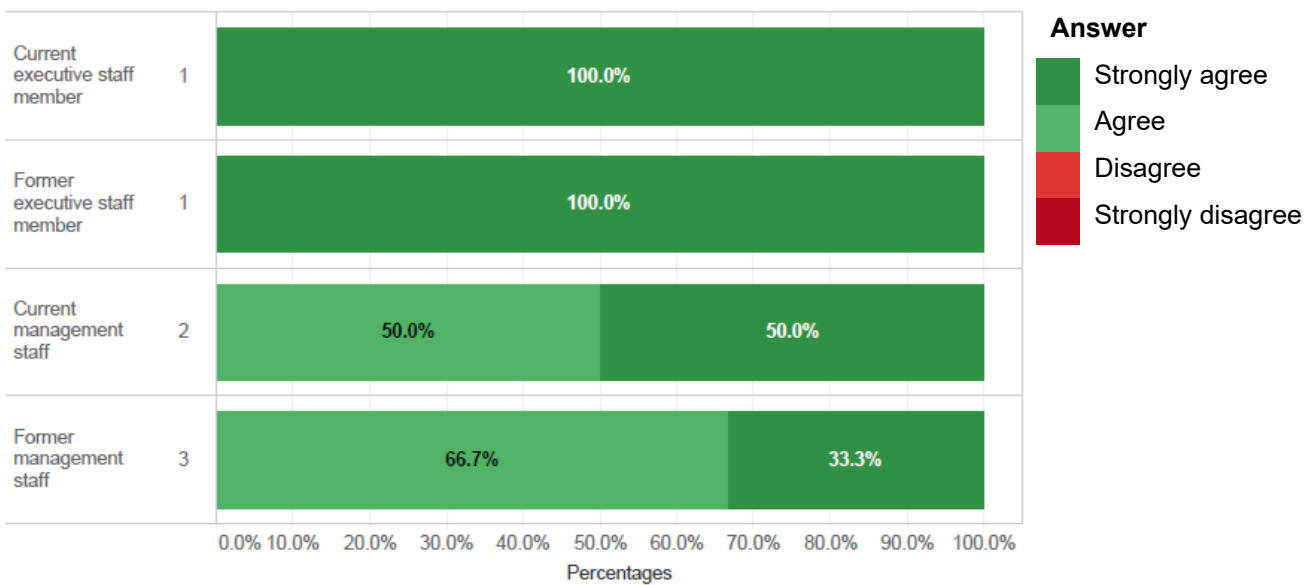
7.2.3.6 Athlete safety and wellbeing are included in WAIS' strategy and strategic documents.

Responses by participant group:



7.2.3.7 WAIS staff model a culture which prioritises athlete safety at WAIS?

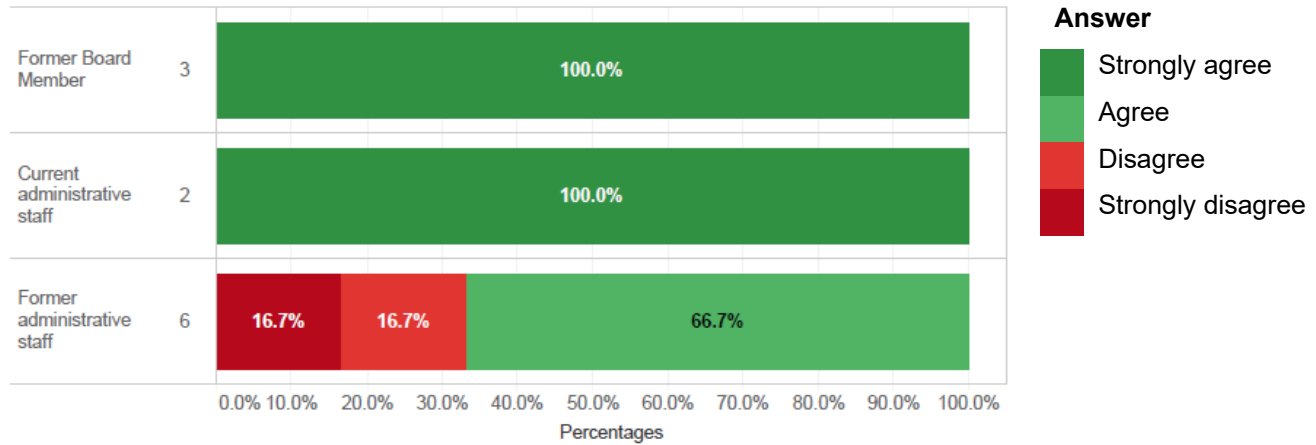
Responses by participant group:



Note: This question was posed to management and executive staff members only.

7.2.3.8 WAIS management, including WAIS Executive, role model a culture which prioritises athlete safety at WAIS

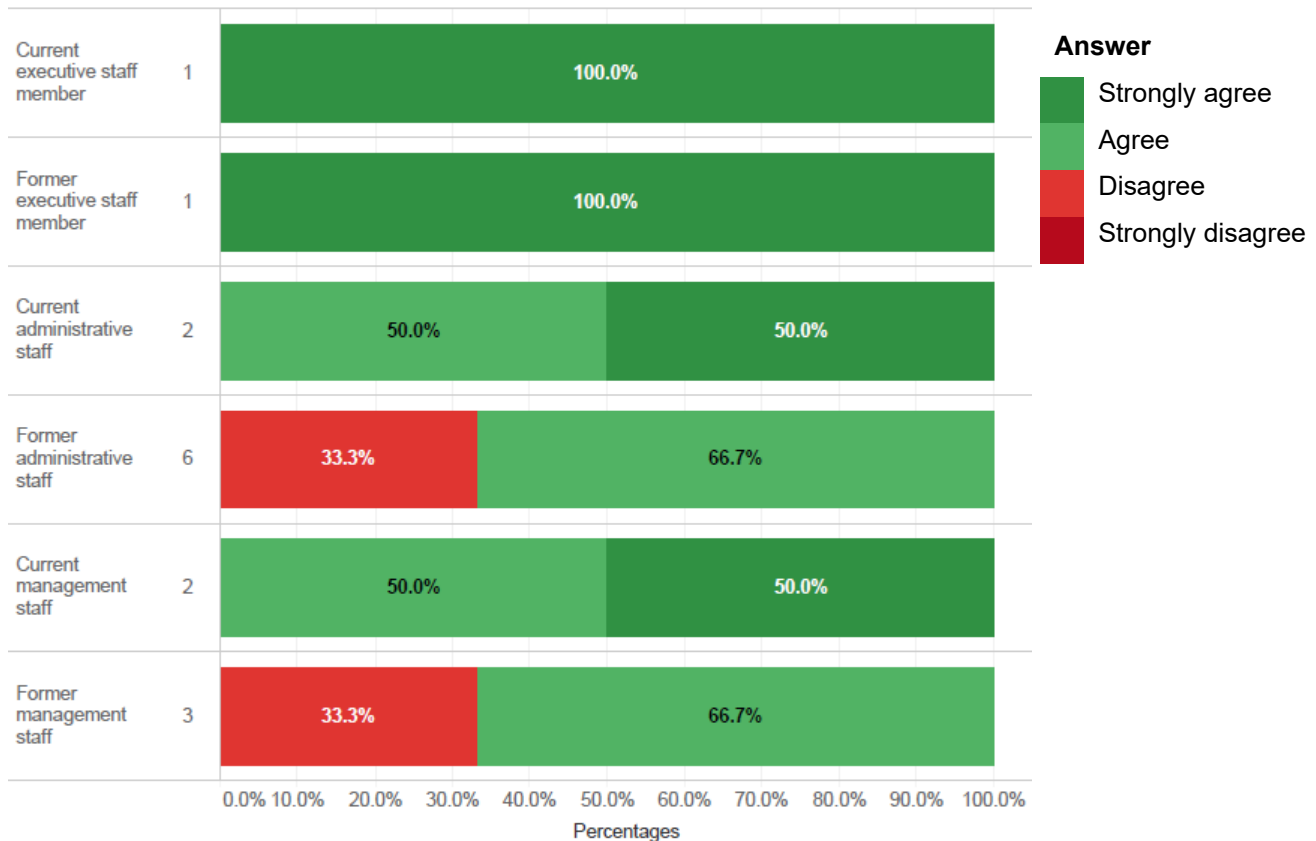
Responses by participant group:



Note: This question was posed to administrative staff and WAIS Board members only.

7.2.3.9 The WAIS Board role model a culture which prioritises athlete safety at WAIS

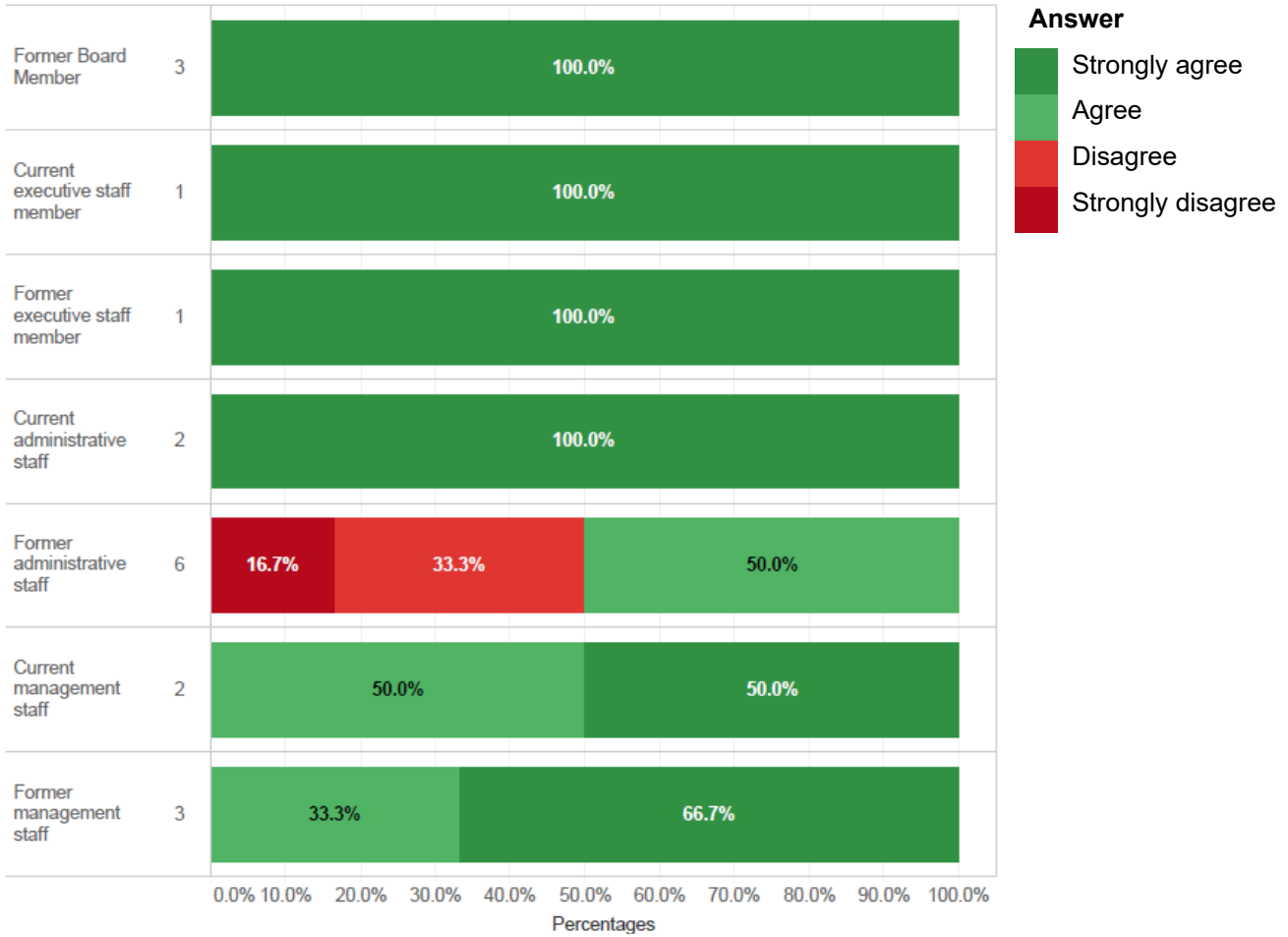
Responses by participant group:



Note: This question was posed to administrative, management and executive staff members only.

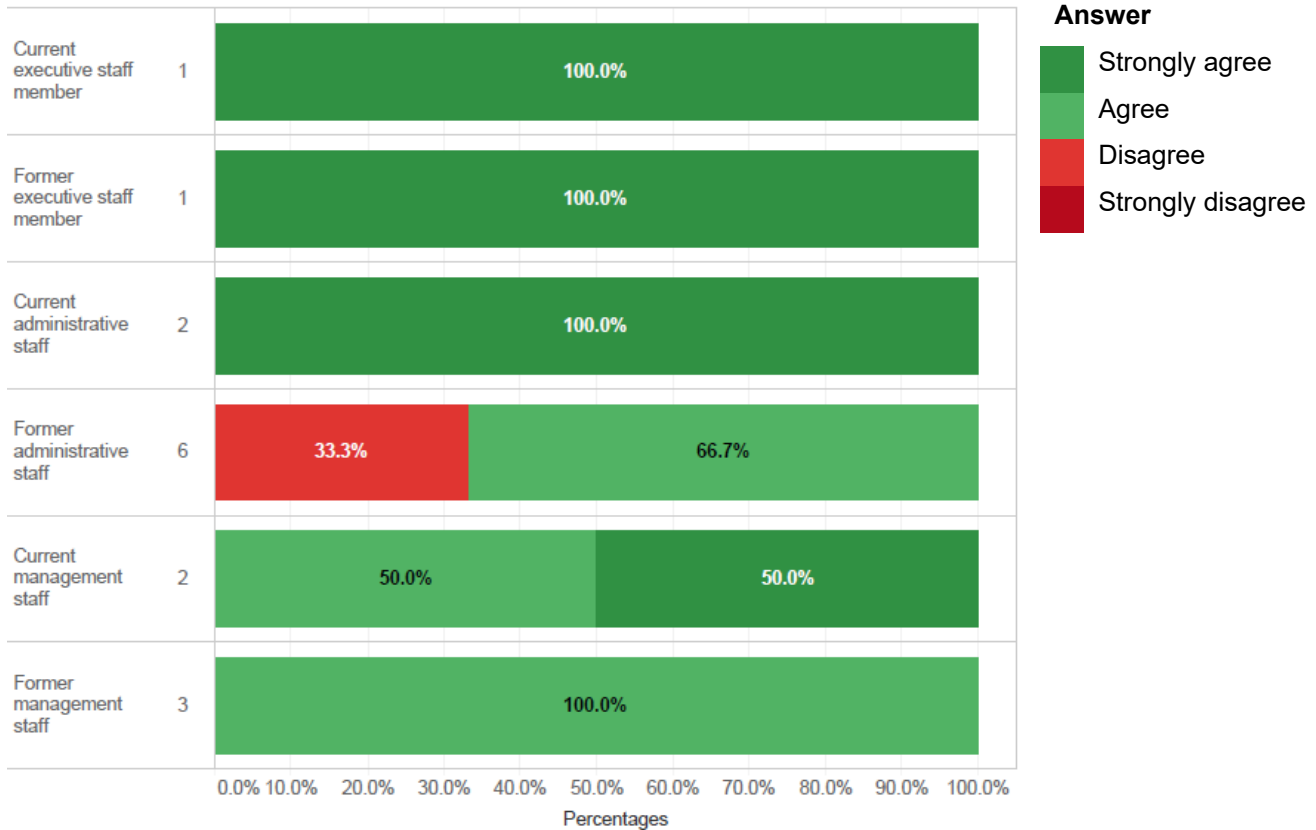
7.2.3.10 I receive information and guidance about athlete safety and wellbeing

Responses by participant group:



7.2.3.11 WAIS staff behave in a way that is consistent with the athlete safety and wellbeing information and guidance they received.

Responses by participant group:



Note: This question was posed to administrative, management and executive staff members only.

7.2.3.12 How are you informed about athlete safety?

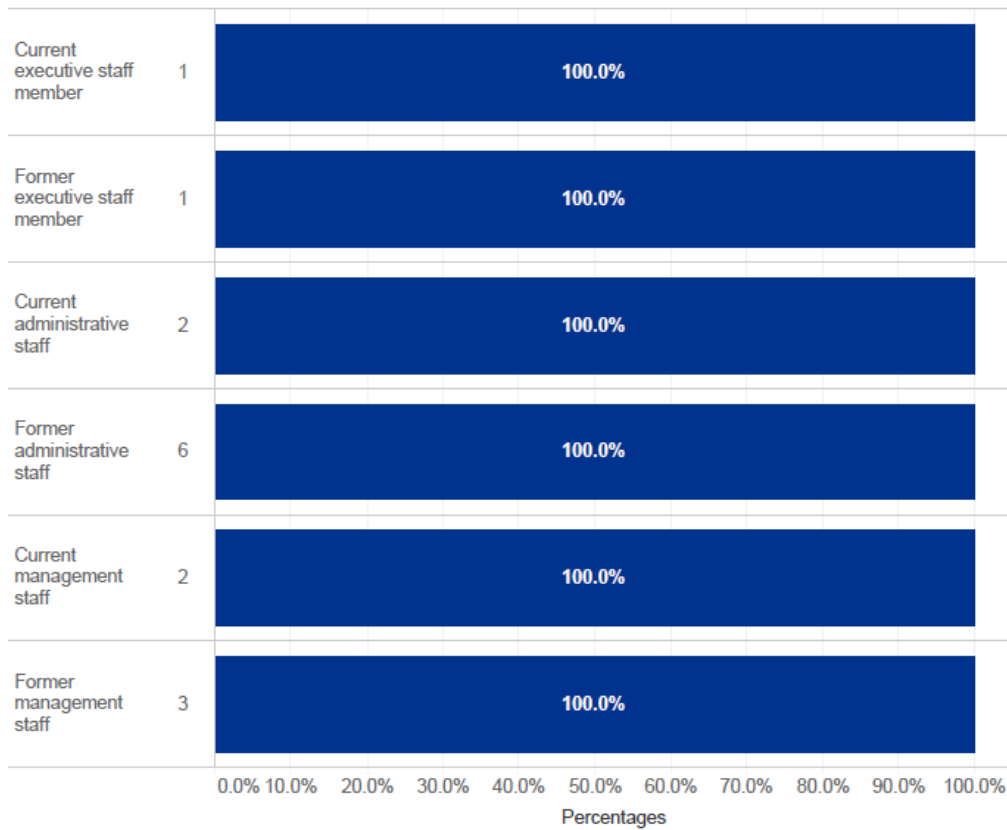
Respondents were able to select multiple options from the following list, results documented below.

- Informed by WAIS policies and procedures
- Informed by education, training or guidance resources
- Informed by staff
- Other
- I have not been informed of athlete safety.

Note: This question was posed to administrative, management and executive staff members only.

Informed by WAIS policies and procedures

Responses by participant group:

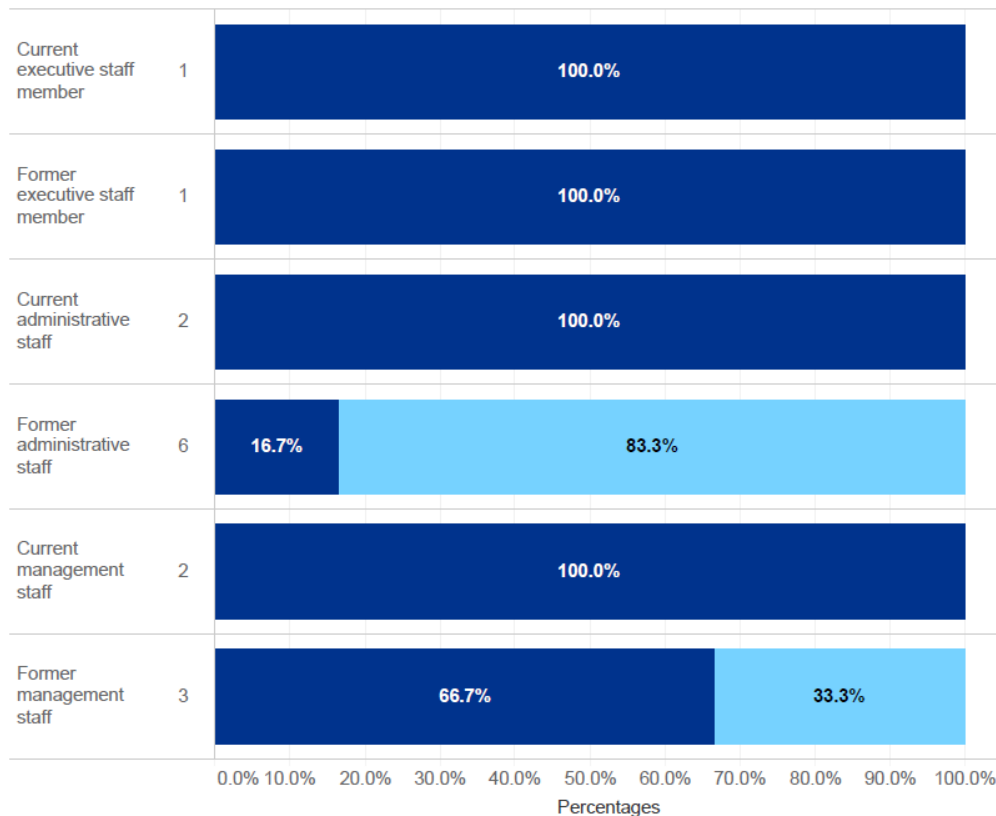


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Informed by education, training or guidance resources

Responses by participant group:

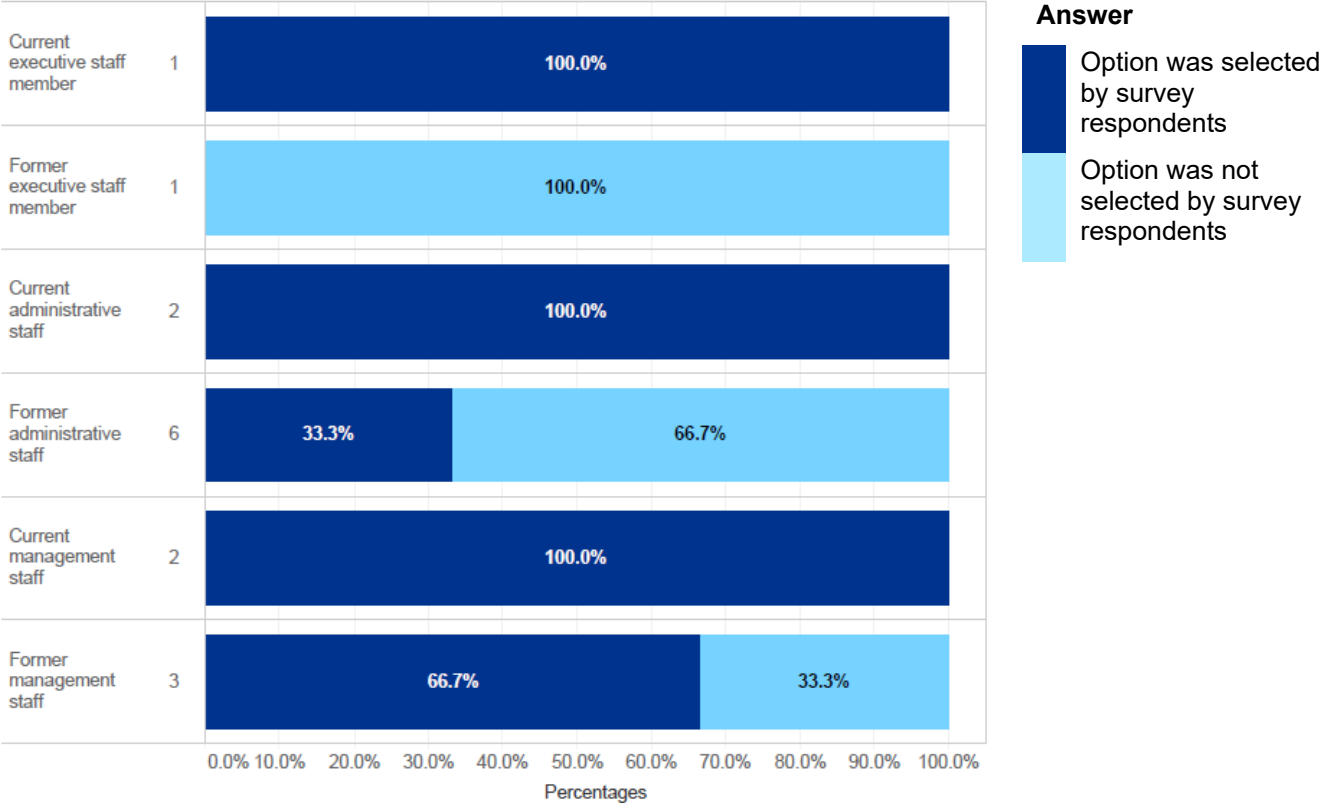


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Informed by staff

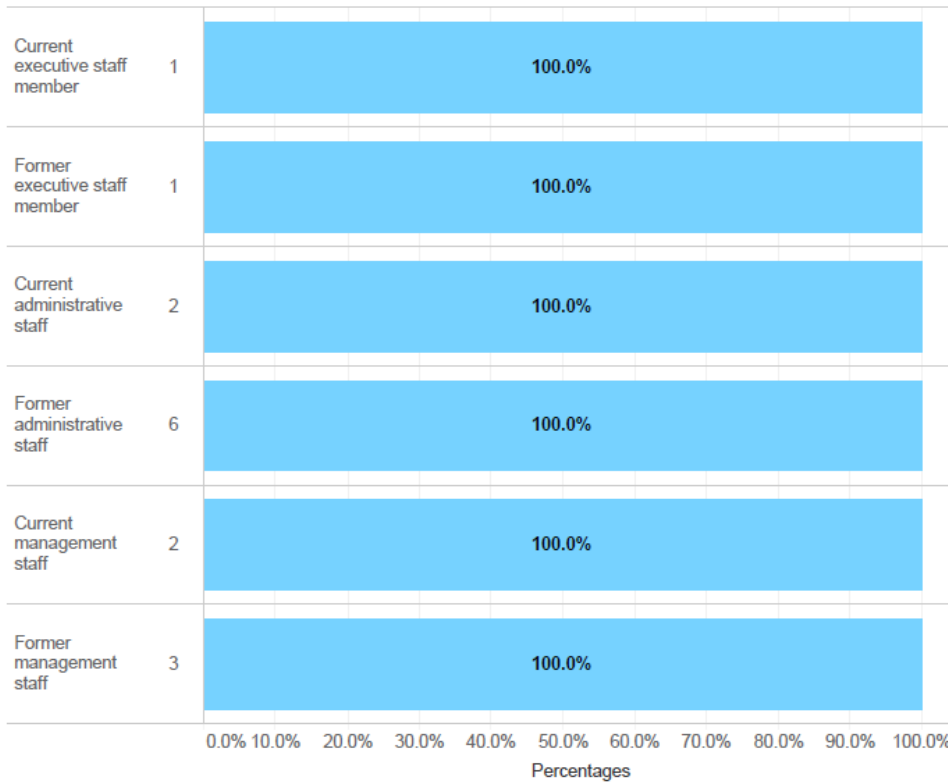
Responses by participant group:



Other: It is noted that three respondents stated that they received information through a medium ‘other’ than the prepopulated options presented. Of these respondents, one participant advised that they receive information through online modules, one participant advised that they receive information through staff meetings, and one participant stated that they receive information through Sports West and DLGSC forums.

I have not been informed about athlete safety

Responses by participant group:

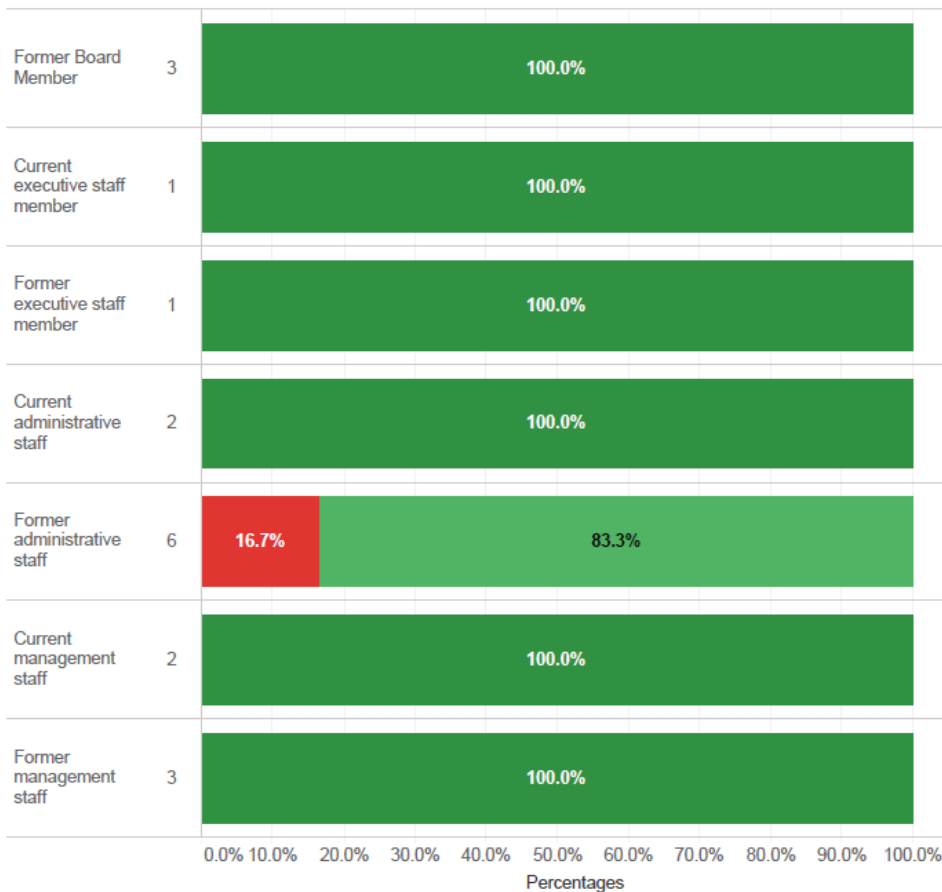


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

7.2.3.13 I am aware of policies and procedures which informed athlete safety and wellbeing at WAIS.

Responses by participant group:

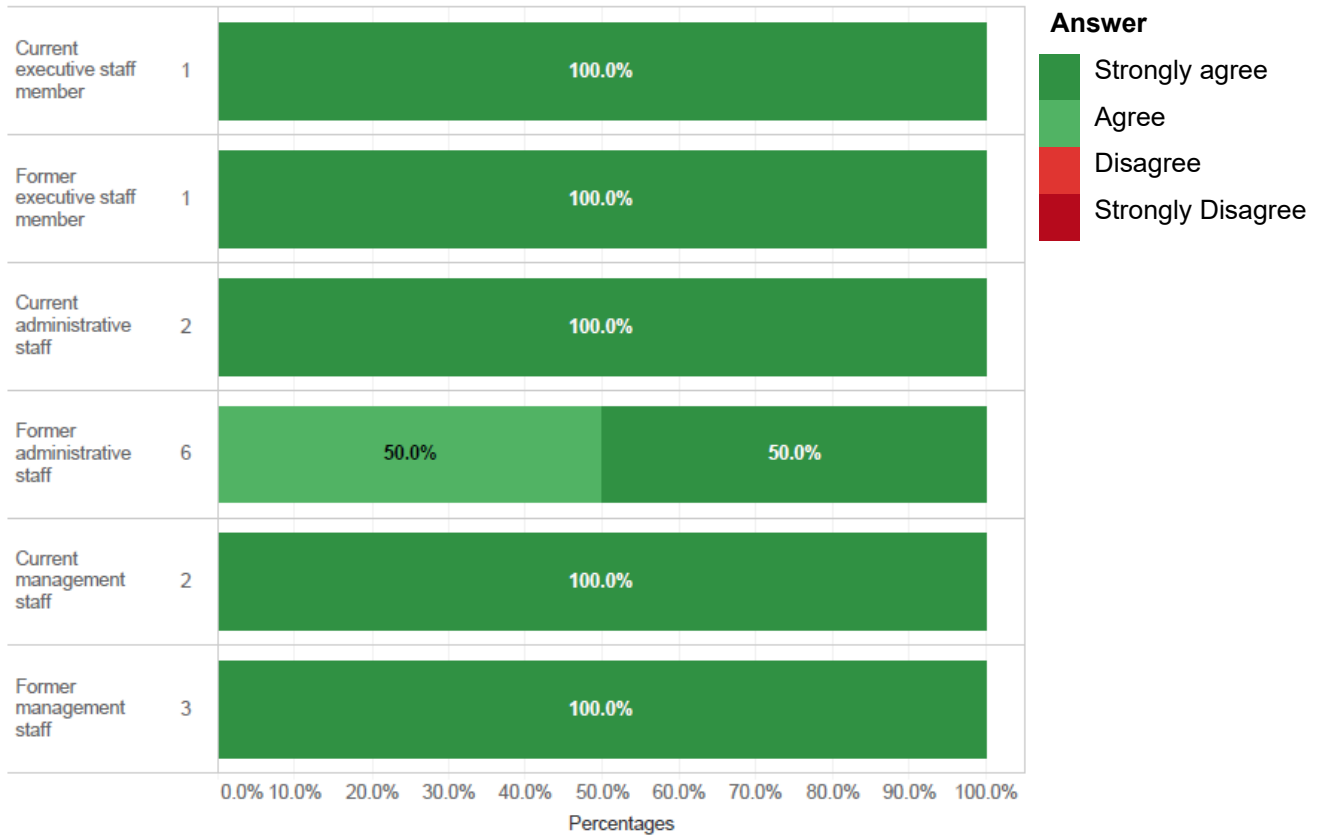


Answer

- Strongly agree
- Agree
- Disagree
- Strongly Disagree

7.2.3.14 I understand my role in keeping athletes safe from harm and abuse.

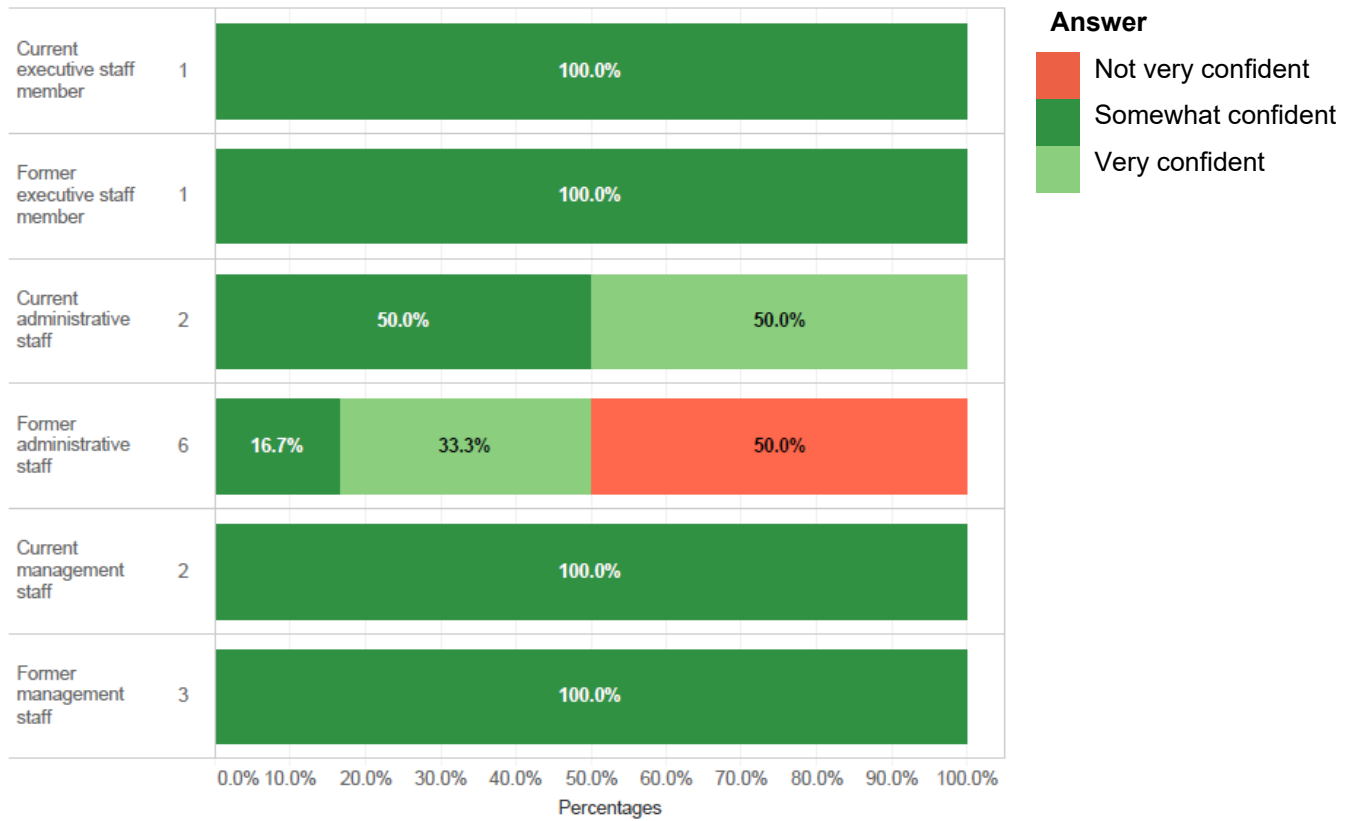
Responses by participant group:



Note: This question was posed to administrative, management and executive staff only.

7.2.3.15 How would you rate your level of confidence in recognising safe and unsafe behaviour whilst at WAIS?

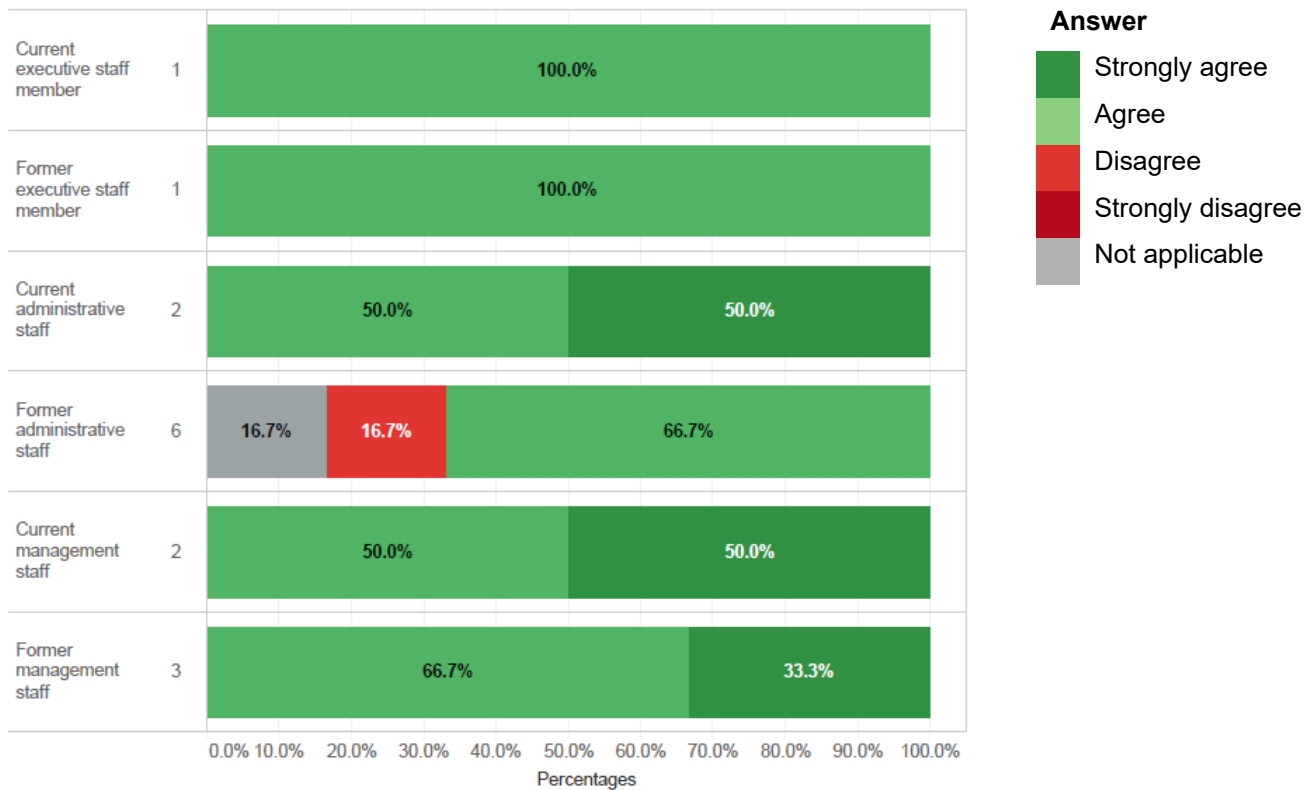
Responses by participant group:



Note: This question was posed to administrative, management and executive staff only.

7.2.3.16 Risks to athlete’s safety are identified and reported.

Responses by participant group:



Note: This question was posed to administrative, management and executive staff only.

7.2.3.17 Have you ever felt an athlete was unsafe because of any of the following? please tick all that apply.

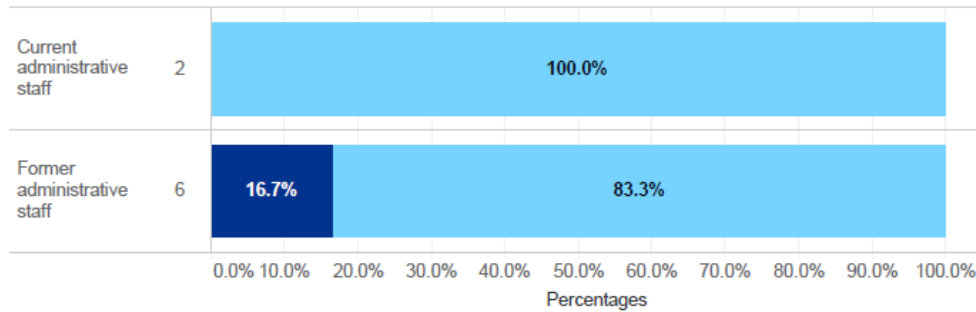
Respondents were asked to select all that apply from the following options, results documented below.

- I felt they were bullied
- I felt they were harassed
- I felt they were body/weight shamed
- I felt they were threatened physically
- I felt they were threatened emotionally
- I felt they might injury themselves
- I felt they were forced to overtrain
- I felt they were being forced to train with injuries
- They were given physical punishments
- I felt they would be punished if they did not meet their coach’s expectations
- I felt they were uncomfortable around a WAIS staff member
- I felt uncomfortable around medical staff
- I felt they were uncomfortable around another athlete
- I felt they were uncomfortable around another parent or spectator
- I felt they were getting unwanted attention
- I felt they were getting inappropriate attention
- I felt they were inappropriately touched
- I felt they were having an inappropriate relationship with someone who wanted something from them
- I felt they were isolated from the world outside their sport
- Other
- I don’t feel like athletes were unsafe at WAIS.

Note: This question was posed to administrative staff only.

Respondents felt athletes were bullied

Responses by participant group:

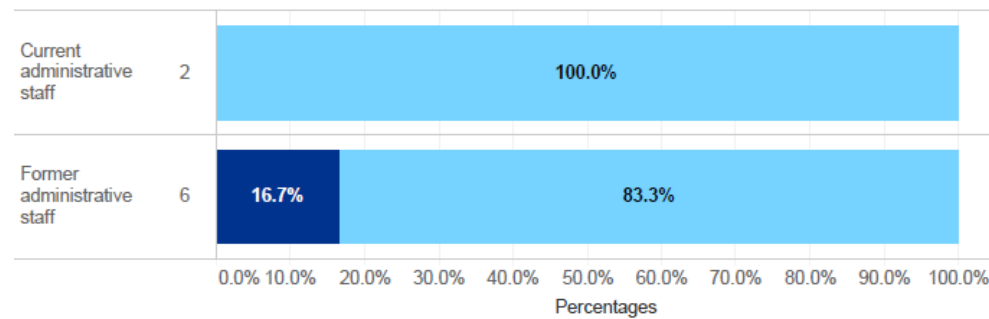


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were harassed

Responses by participant group:

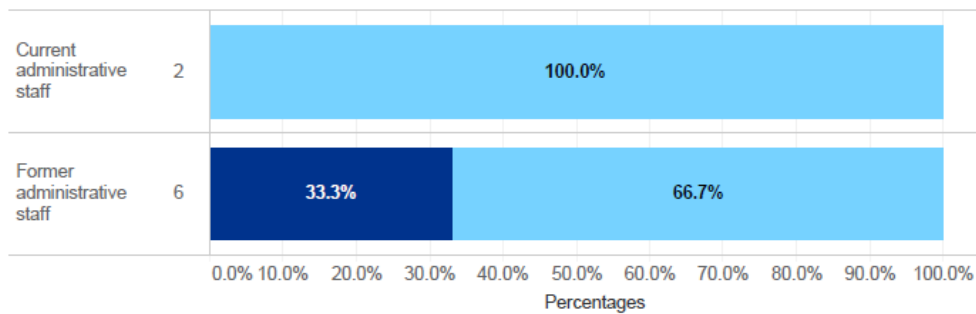


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were body shamed/ weight shamed

Responses by participant group:

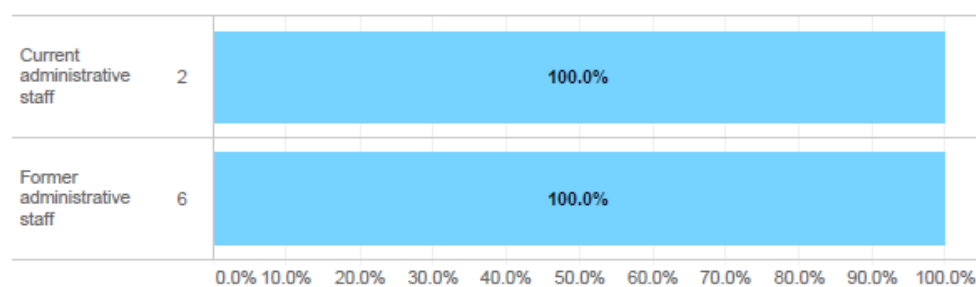


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were threatened physically

Responses by participant group:

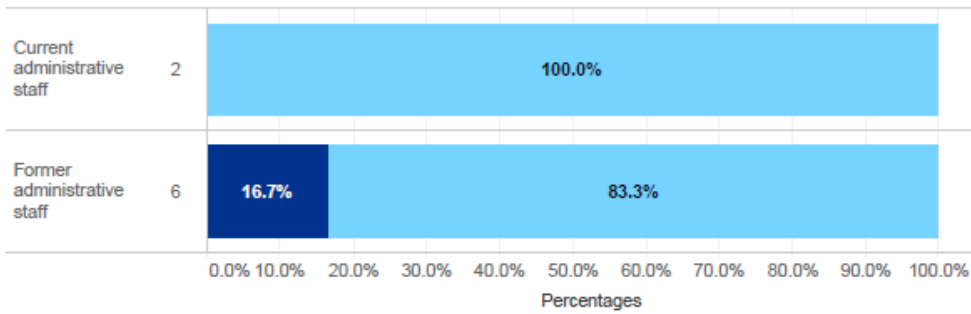


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were threatened emotionally

Responses by participant group:

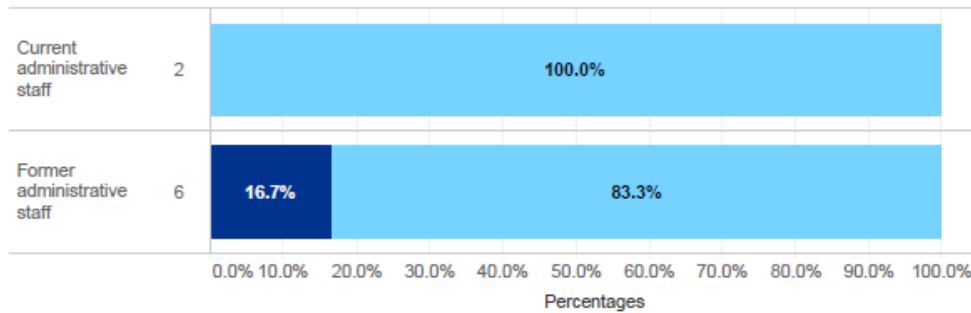


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes might injure themselves

Responses by participant group:

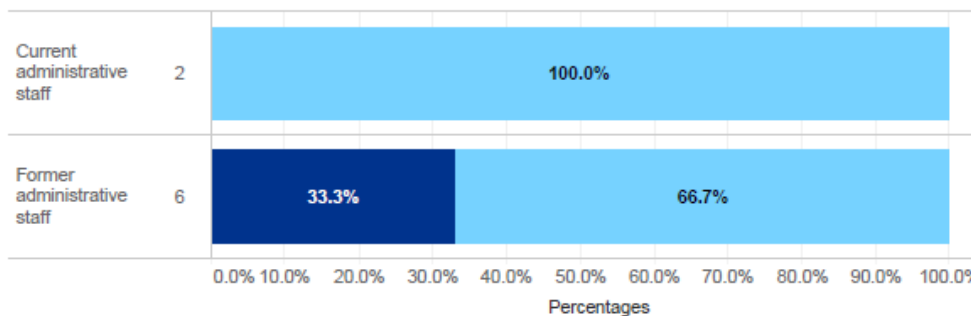


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were forced to overtrain

Responses by participant group:

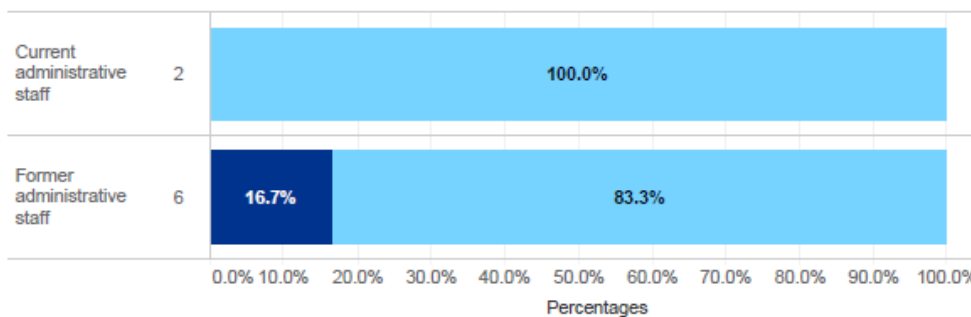


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were forced to train with injuries

Responses by participant group:

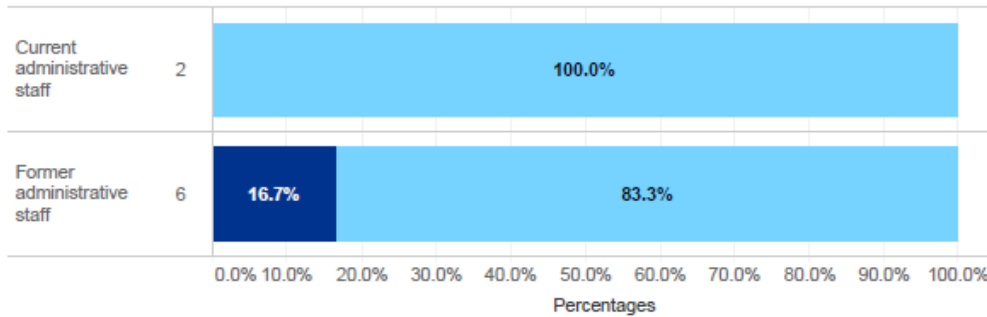


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were given physical punishments

Responses by participant group:

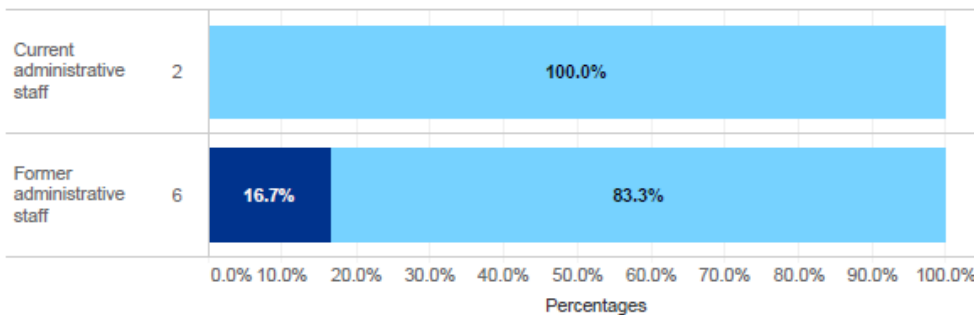


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were punished if they did not meet coaches' expectations

Responses by participant group:

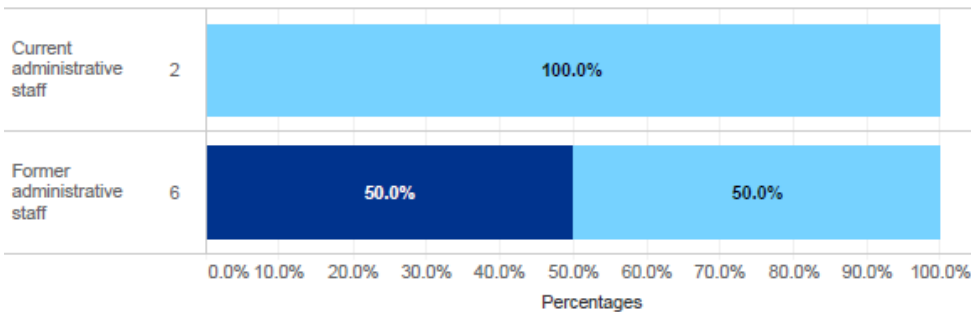


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around a WAIS staff member

Responses by participant group:

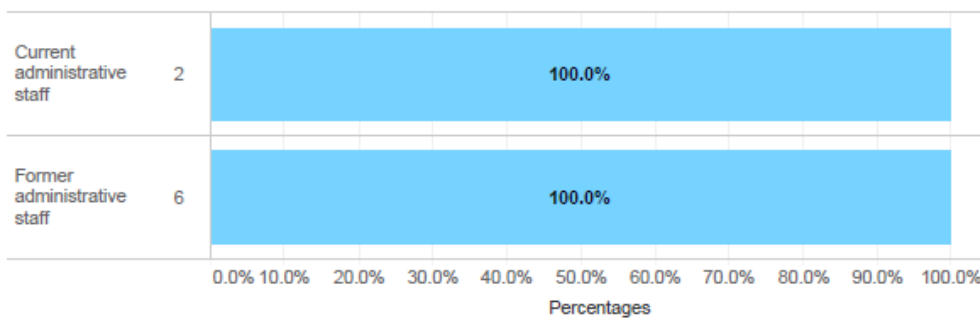


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around medical staff

Responses by participant group:

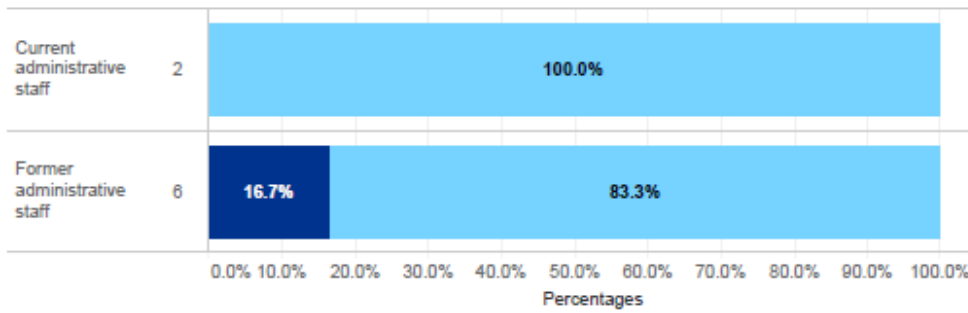


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around another athlete

Responses by participant group:

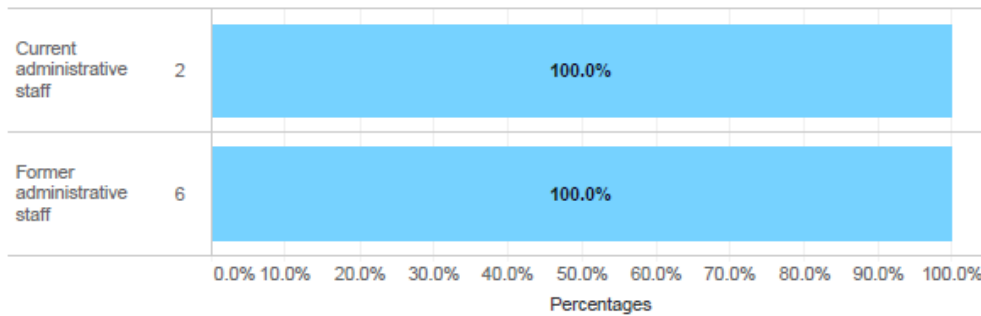


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were uncomfortable around another parent or spectator

Responses by participant group:

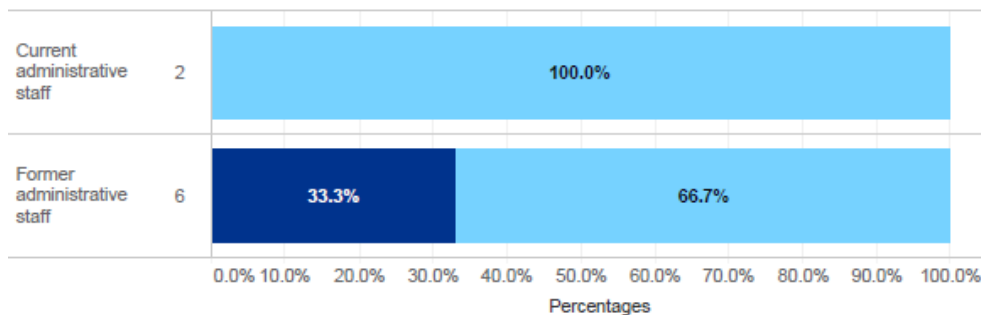


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were getting unwanted attention

Responses by participant group:

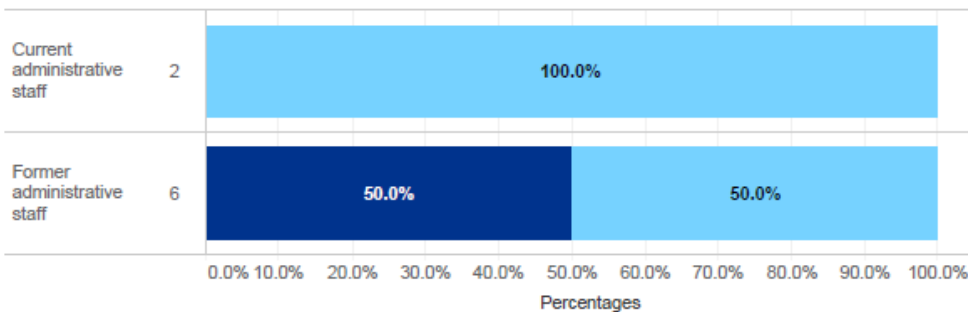


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were getting inappropriate attention

Responses by participant group:

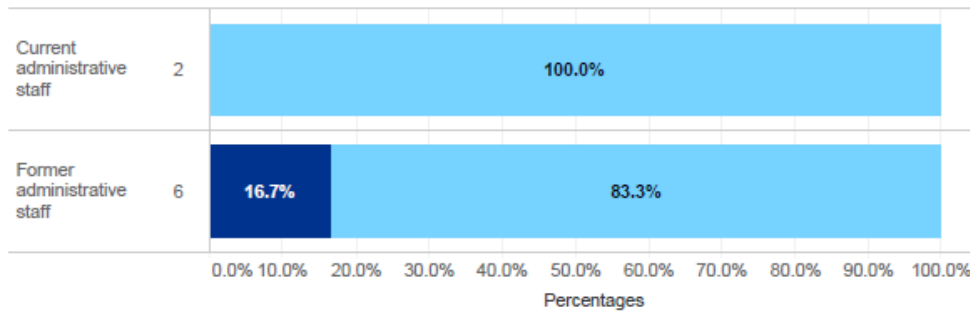


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were inappropriately touched

Responses by participant group:

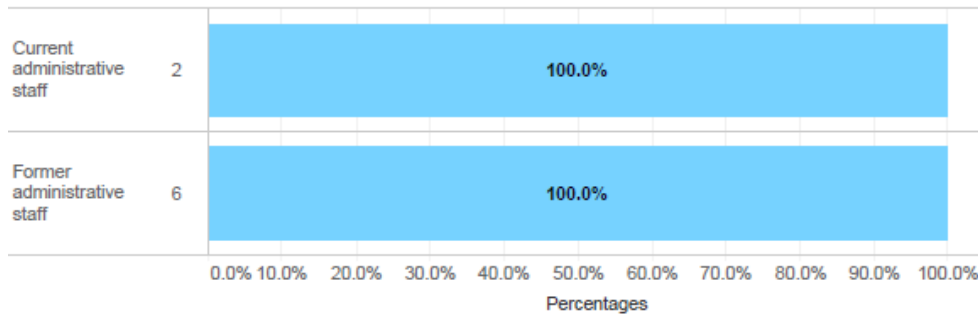


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were in an inappropriate relationship with someone who wanted something from them

Responses by participant group:

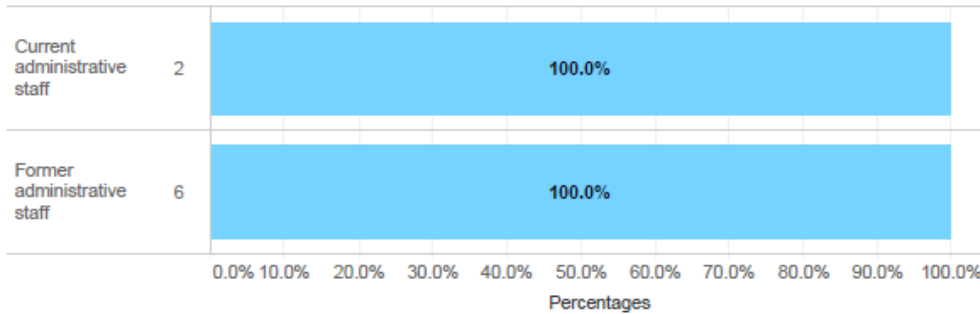


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Respondents felt athletes were isolated from the world outside of sport

Responses by participant group:



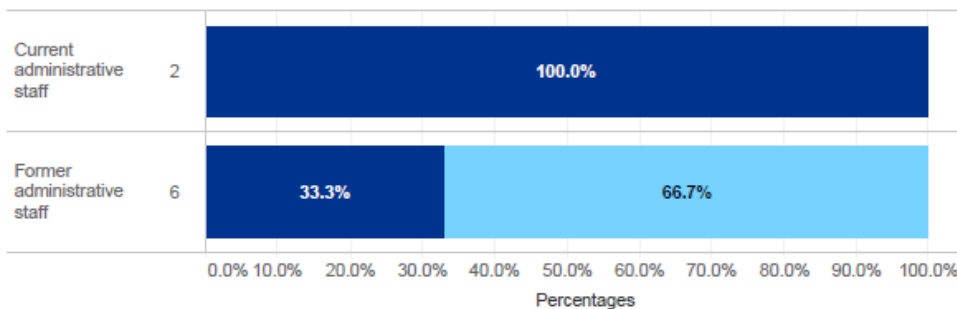
Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

Other: It is noted that one respondent stated that they felt an athlete was an unsafe through a scenario 'other' than the prepopulated options presented. This participant advised that WAIS staff informed them that a staff member was being inappropriate with female athletes.

Respondents did not feel like athletes were unsafe at WAIS

Responses by participant group:

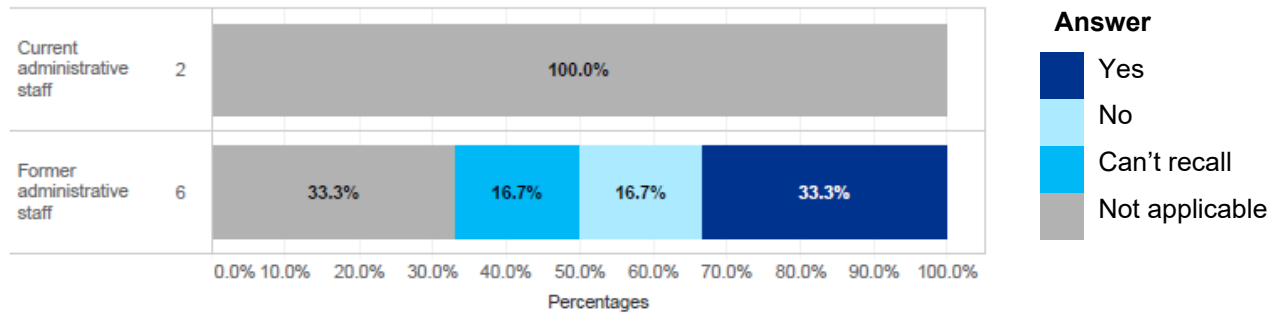


Answer

- Option was selected by survey respondents
- Option was not selected by survey respondents

7.2.3.18 When you felt an athlete was unsafe did you tell someone, or talk to someone?

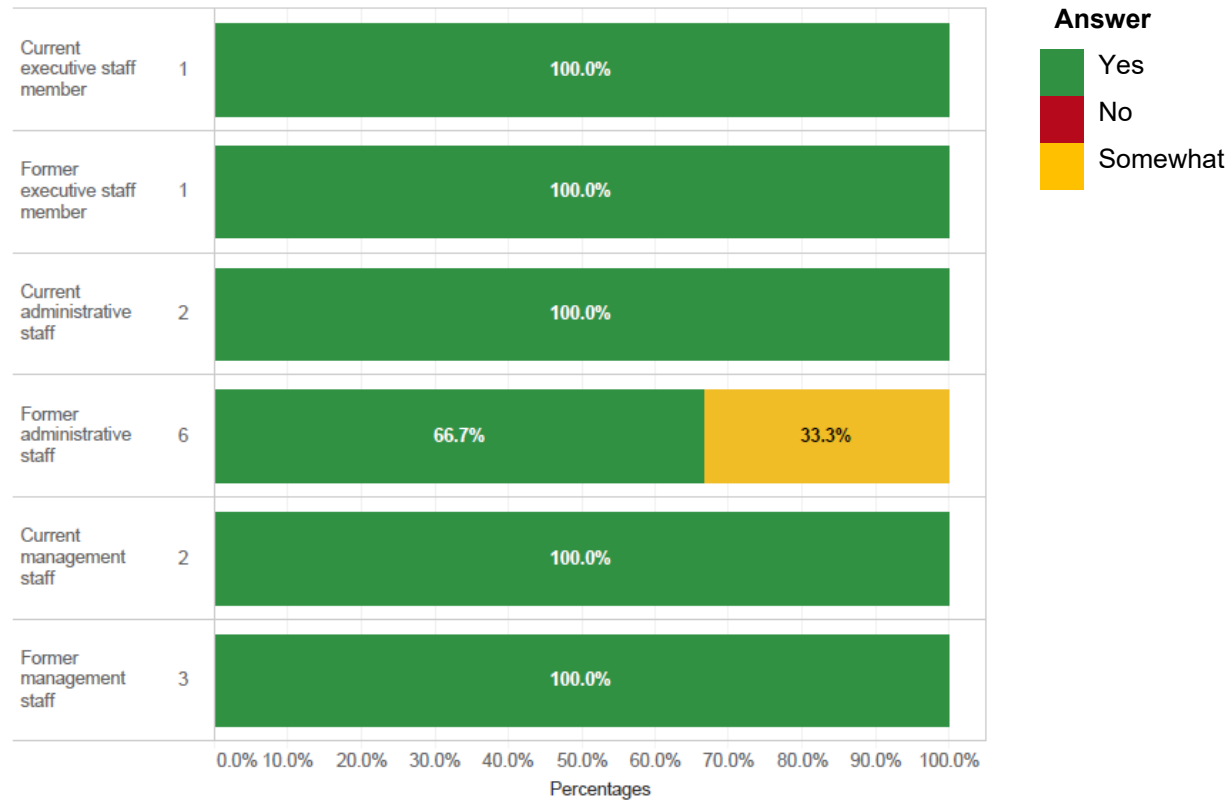
Responses by participant group:



Note: This question was posed to administrative staff only. Respondents who indicated feeling unsafe at WAIS to 7.2.3.17 were prompted to answer this question. Those who reported that neither they nor their family members have felt unsafe at WAIS were recorded as 'not applicable.'

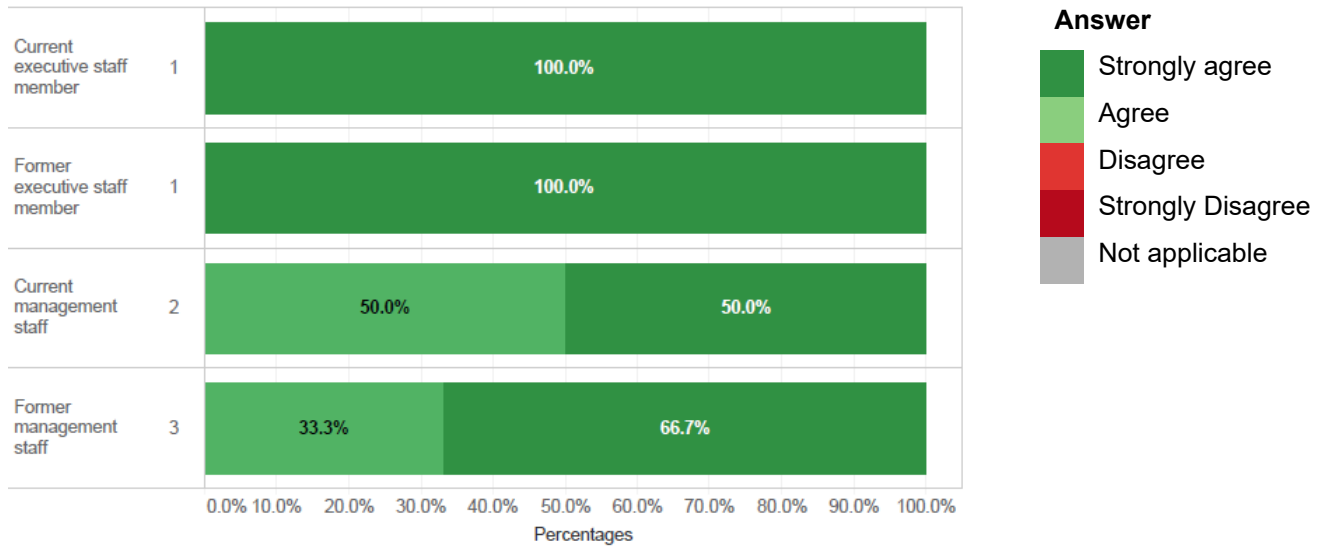
7.2.3.19 Did you know how to raise complaints about athlete safety and wellbeing?

Responses by participant group:



7.3.3.20 I know how to escalate complaints about athlete safety and wellbeing

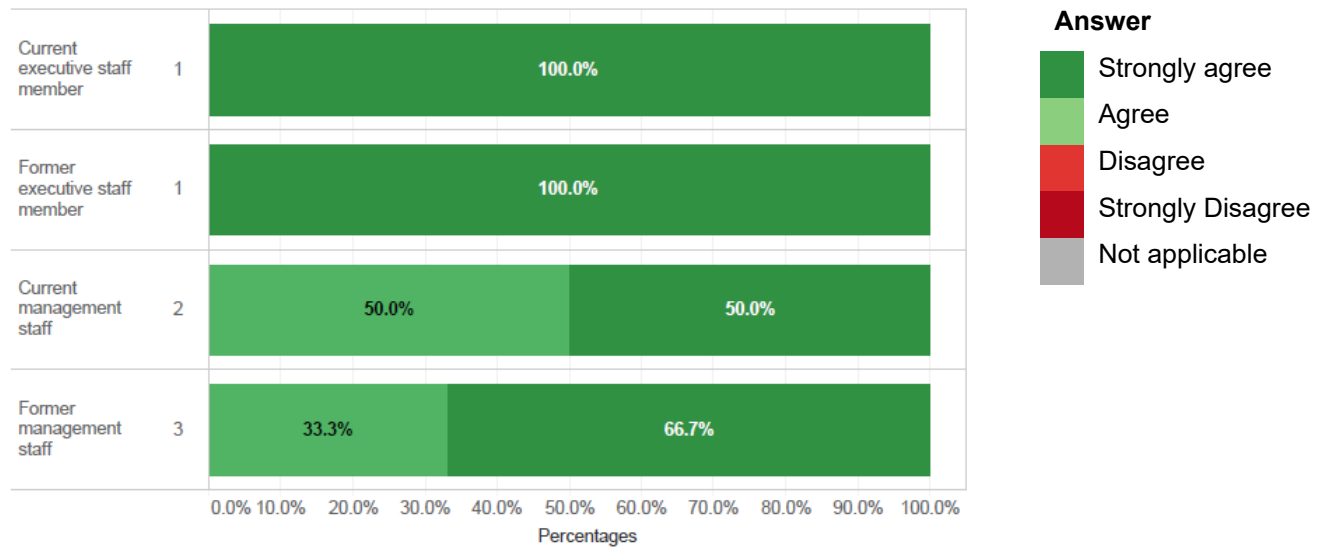
Responses by participant group:



Note: This question was posed to management and executive staff only.

7.3.3.21 I know who is responsible for handling complaints regarding athlete safety and wellbeing.

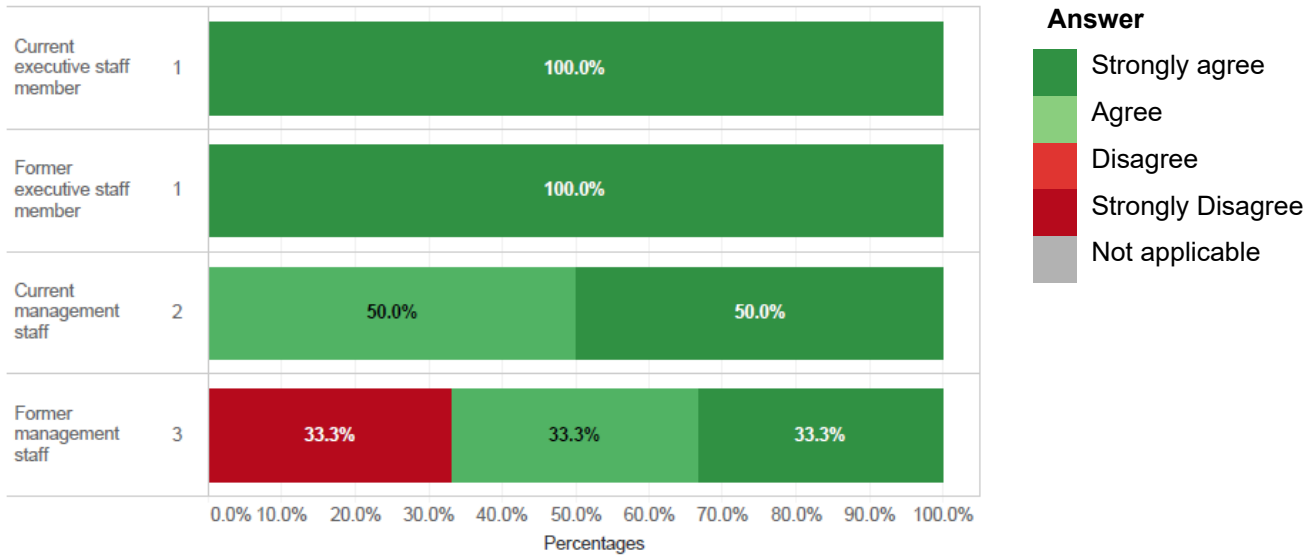
Responses by participant group:



Note: This question was posed to management and executive staff only.

7.3.3.22 I believe leaders at WAIS prioritise complaints handling related to athlete safety and wellbeing over success in performance results.

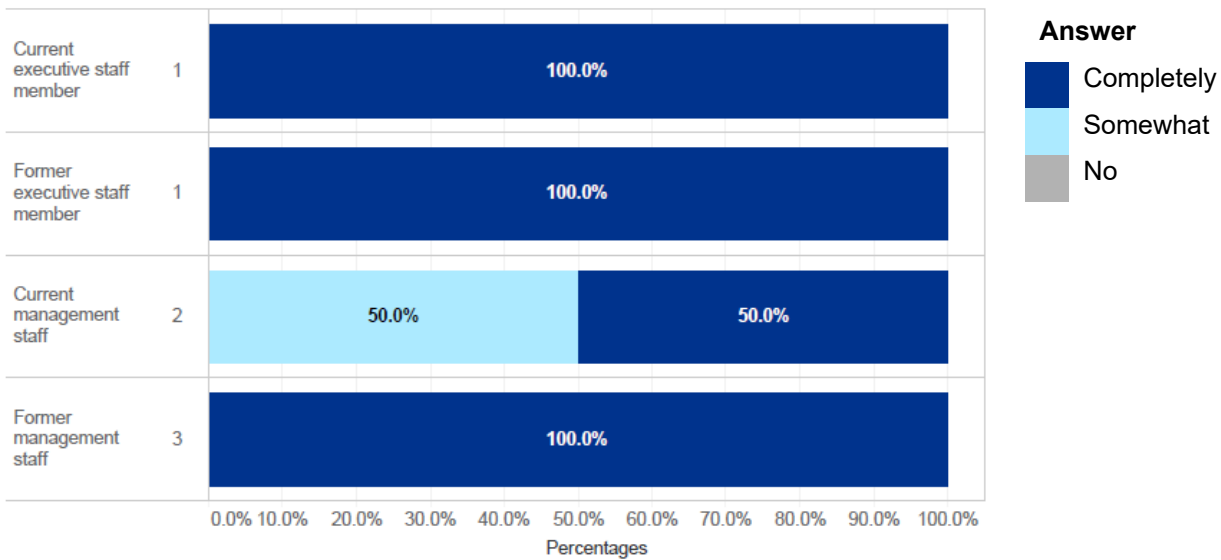
Responses by participant group:



Note: This question was posed to management and executive staff only.

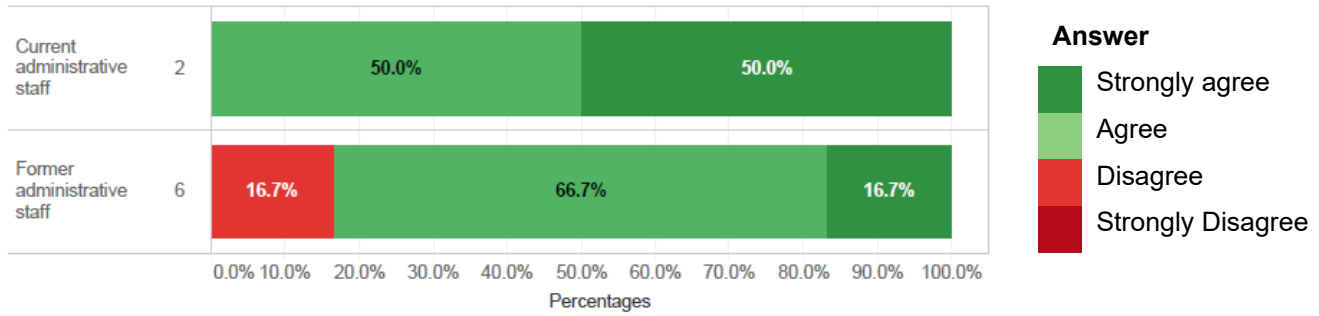
7.3.3.23 Is education, training and guidance resources provided about how to raise a complaint about athlete safety and wellbeing?

Responses by participant group:



Note: This question was posed to management and executive staff only.

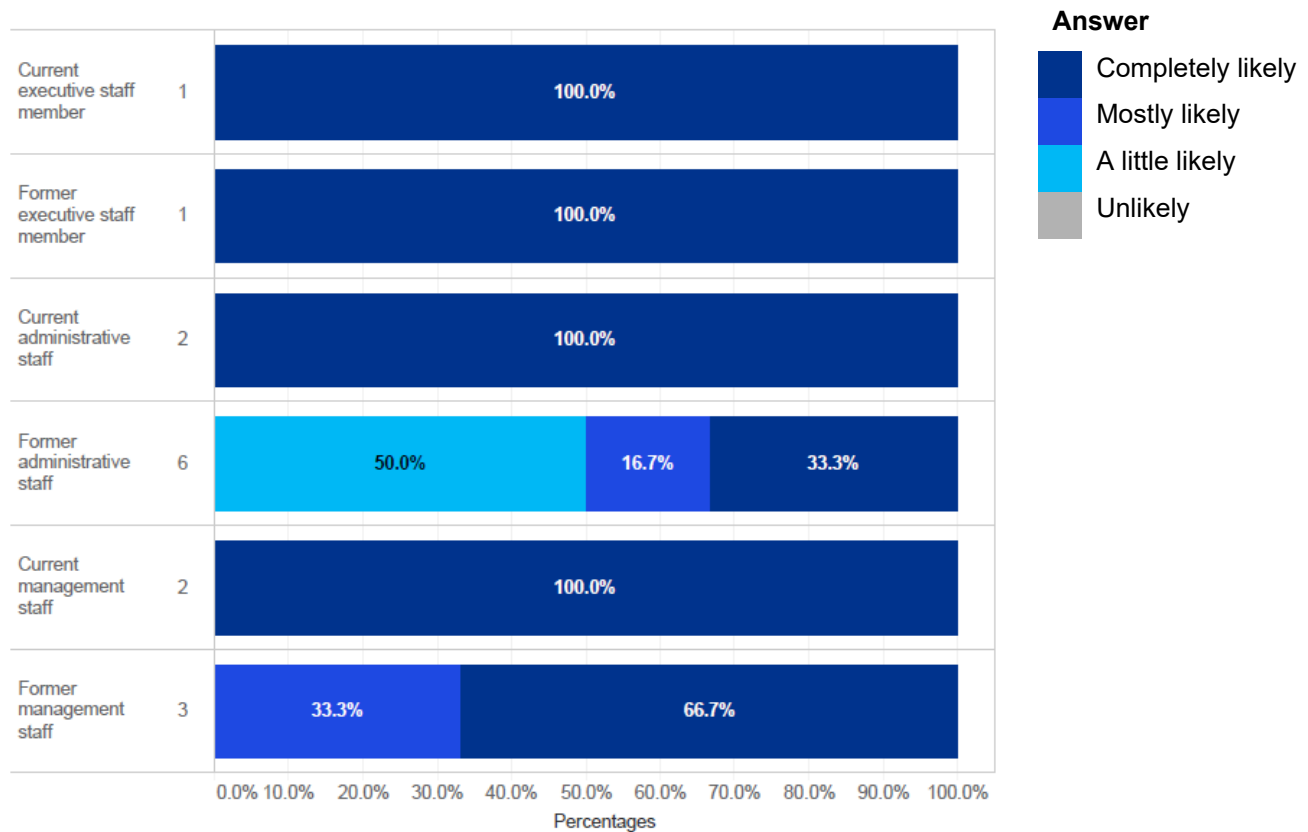
7.3.3.24 Have WAIS told you how to raise a complaint if you, or someone you know, is unsafe?



Note: This question was posed to administrative staff only.

7.3.3.25 How likely are you to raise complaints if you have concerns about athlete safety and wellbeing?

Responses by participant group:



Note: This question was posed to administrative, management and executive staff only.

7.3.3.26 When I have previously raised complaints, I felt it was addressed by WAIS in a timely manner.

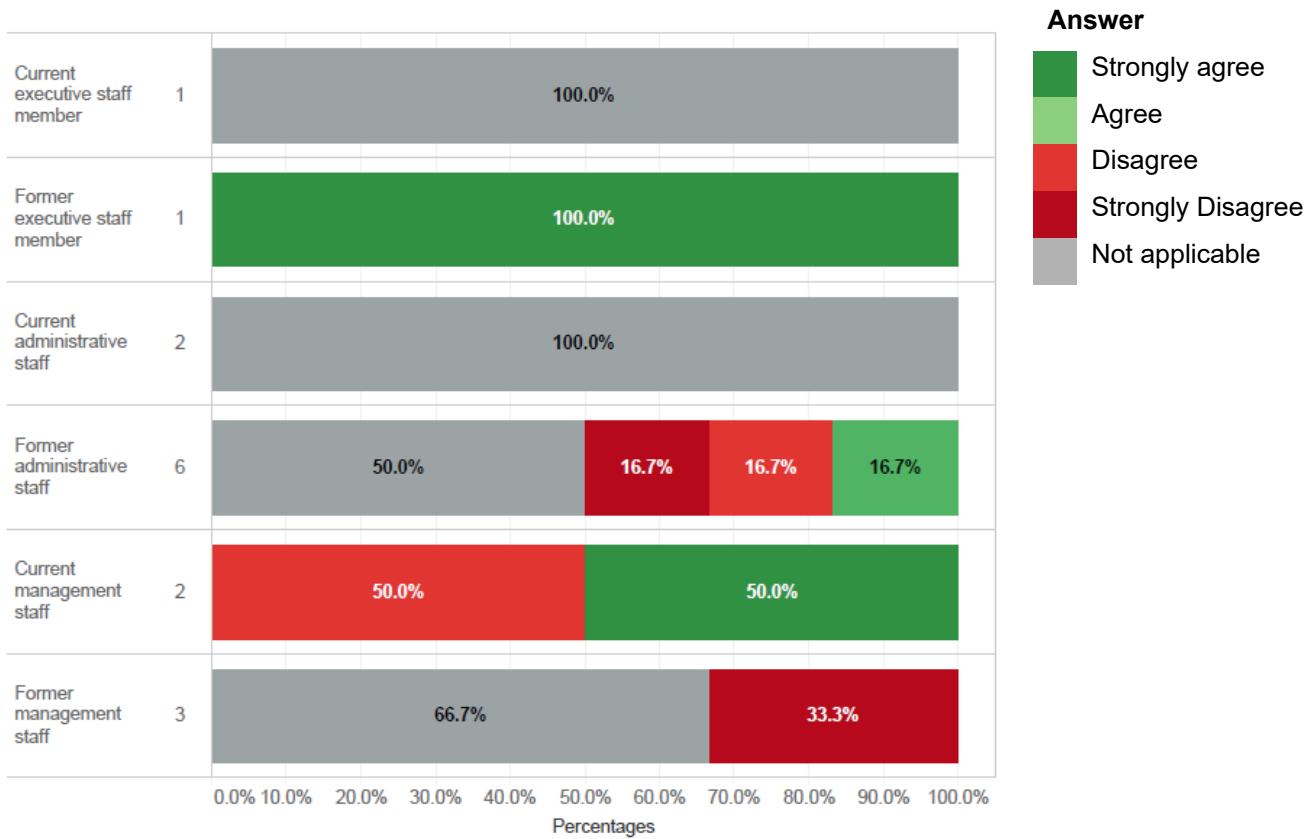
Responses by participant group:



Note: This question was posed to administrative, management and executive staff only.

7.2.3.27 When I have previously raised a complaint, I felt WAIS responded appropriately.

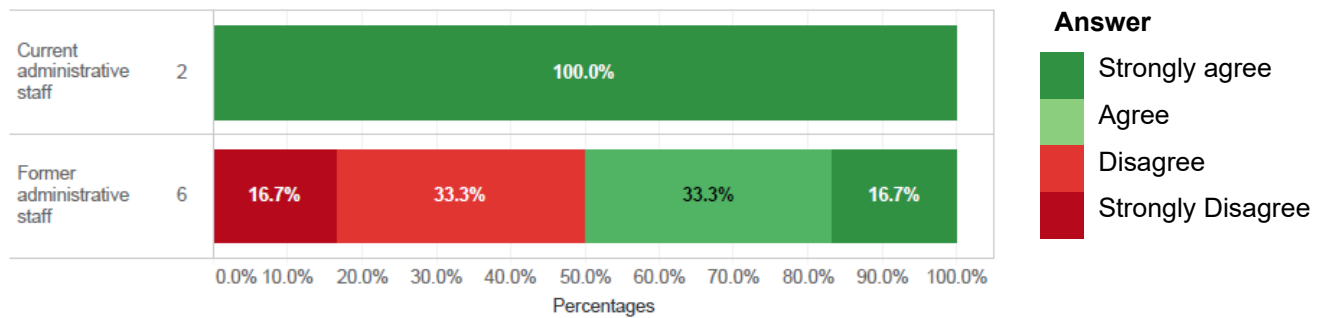
Responses by participant group:



Note: This question was posed to administrative, management and executive staff only.

7.2.3.28 Leaders at WAIS encourage me to raise complaints about athlete safety and wellbeing.

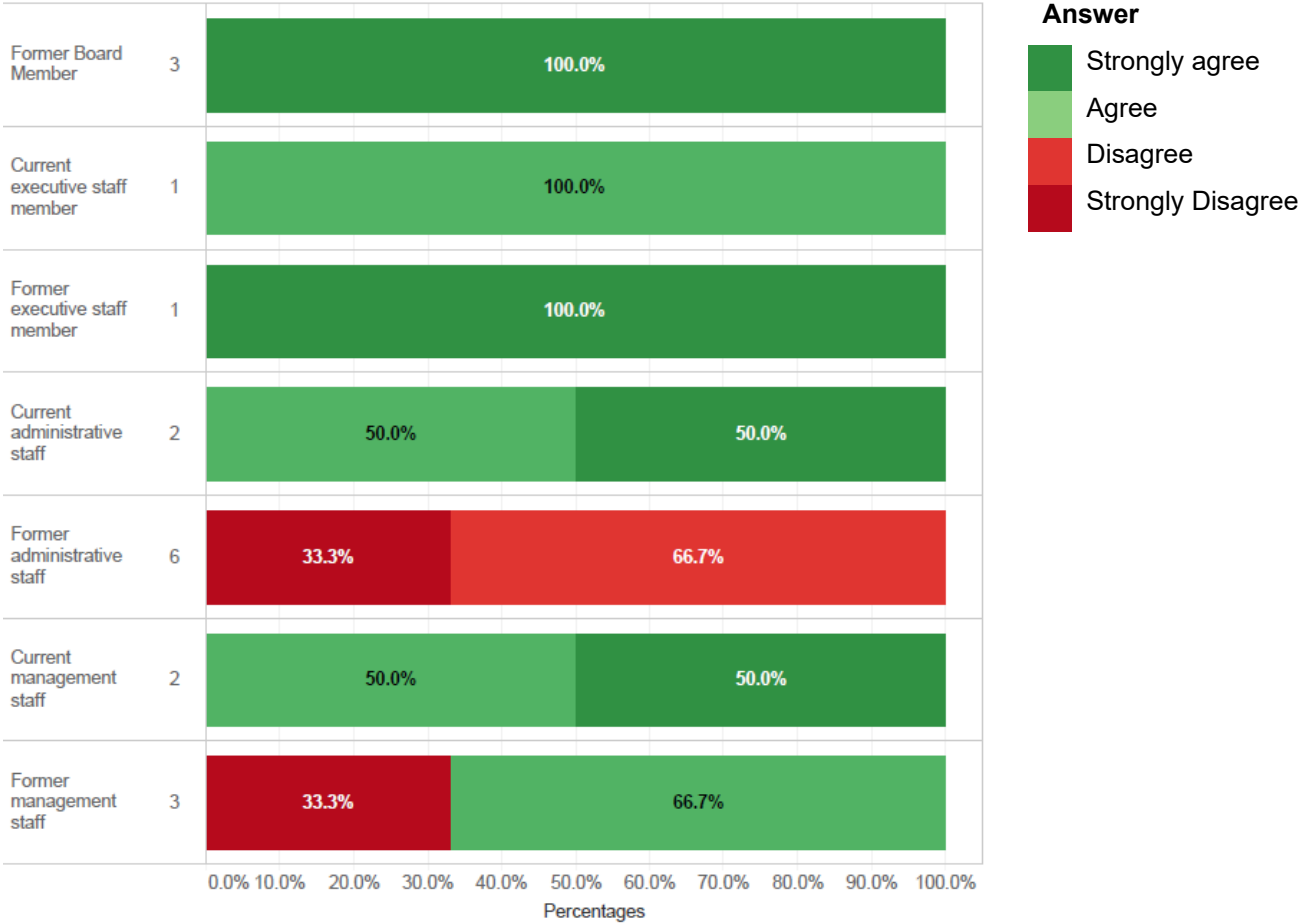
Responses by participant group:



Note: This question was posed to administrative staff only.

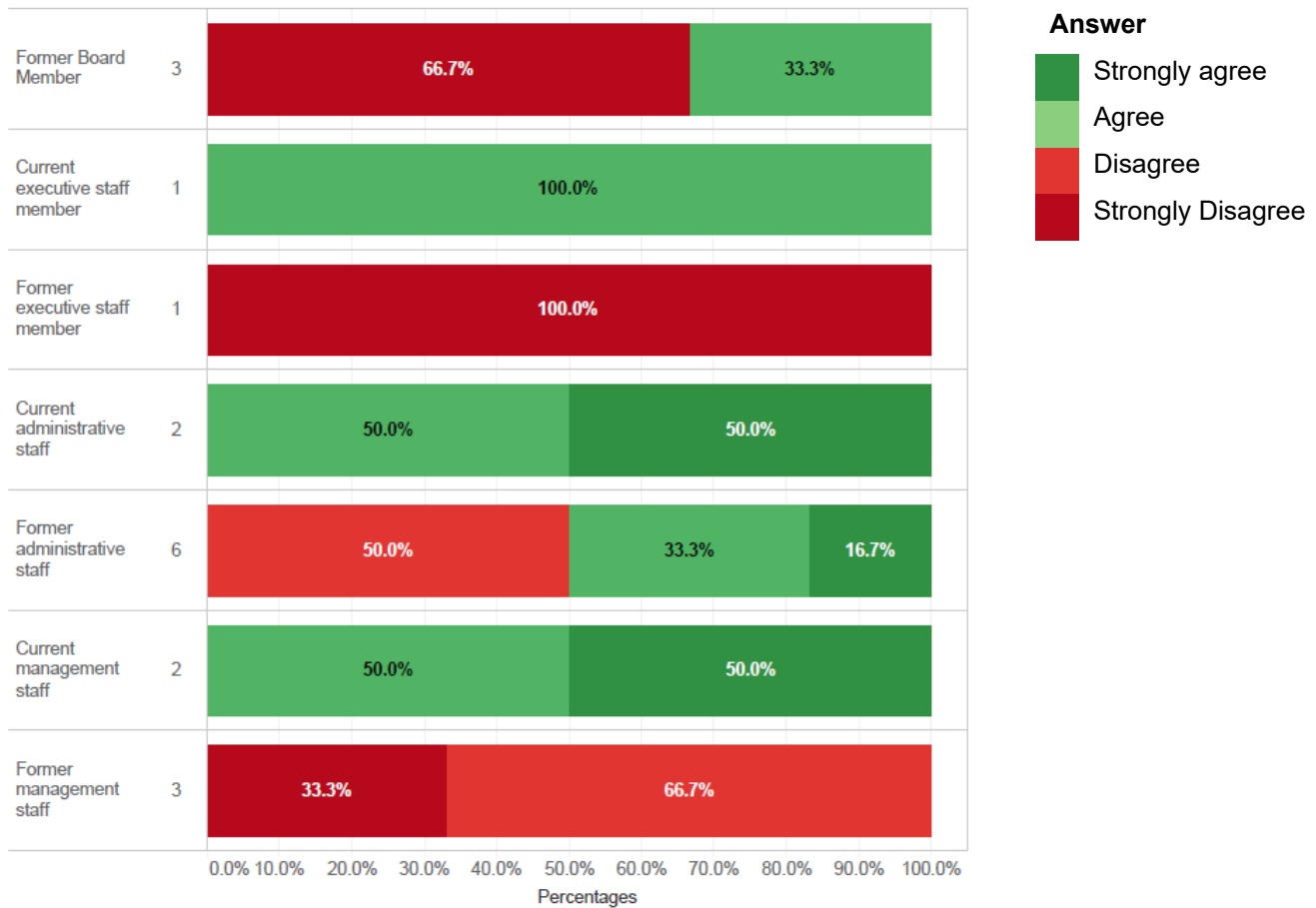
7.2.3.29 I believe people at WAIS are held accountable for their actions.

Responses by participant group:



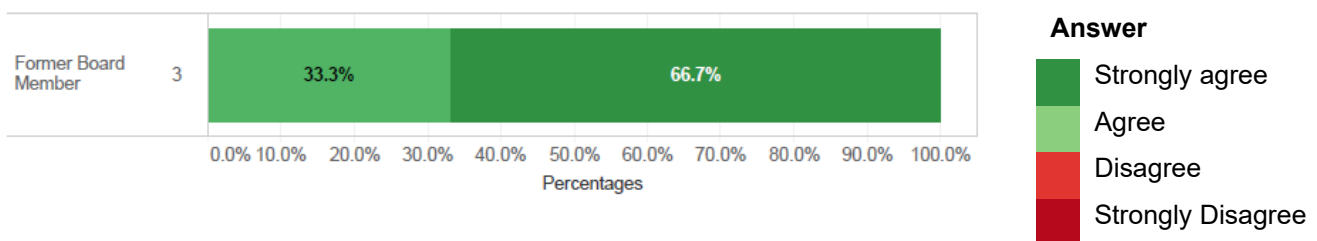
7.2.3.30 Inappropriate behaviour is sanctioned at WAIS.

Responses by participant group:



7.2.3.31 I believe WAIS have robust complaint handling processes.

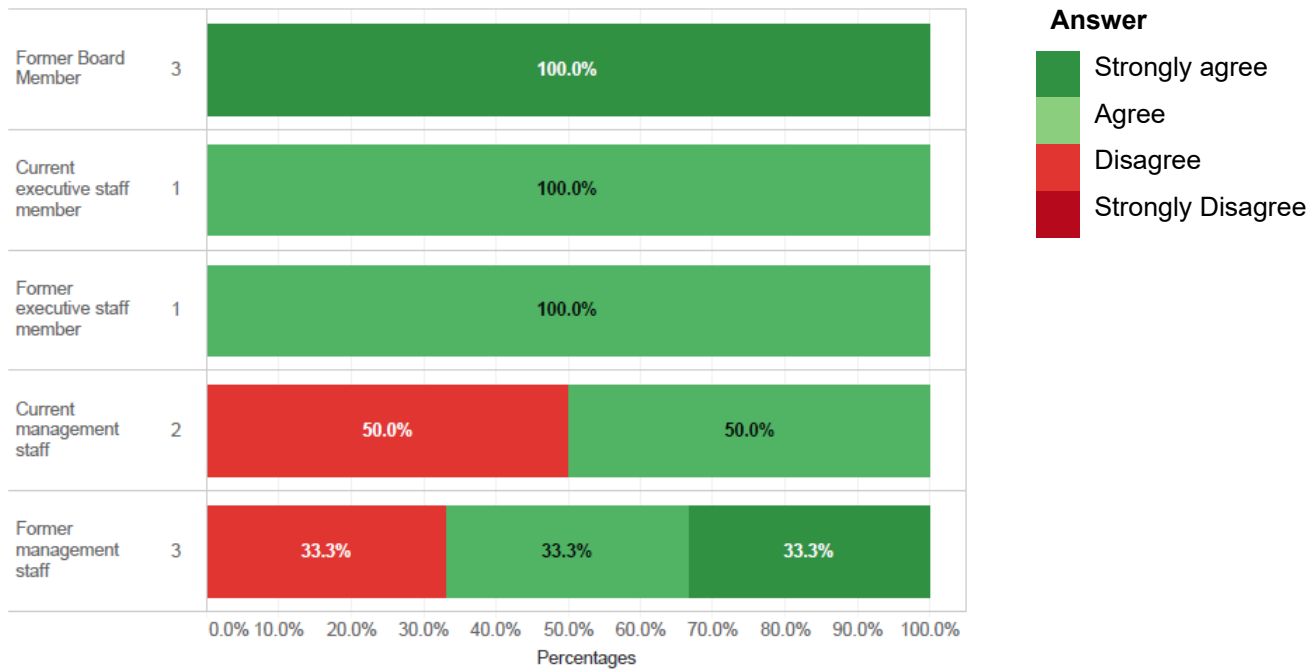
Responses by participant group:



Note: This question was posed to WAIS Board members only.

7.2.3.32 I receive high quality reporting on safeguarding issues and risks.

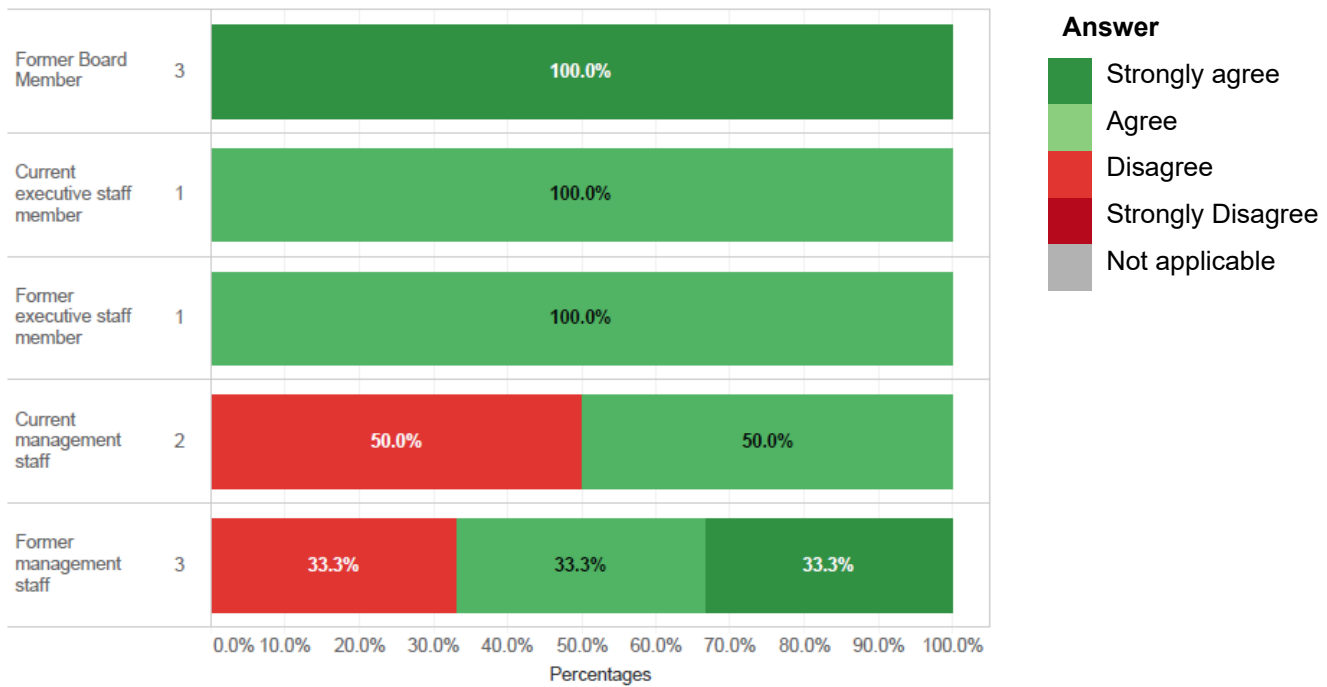
Responses by participant group:



Note: This question was posed to management staff, executive staff and WAIS Board members only.

7.3.3.33 I receive timely reporting on safeguarding issues and risks.

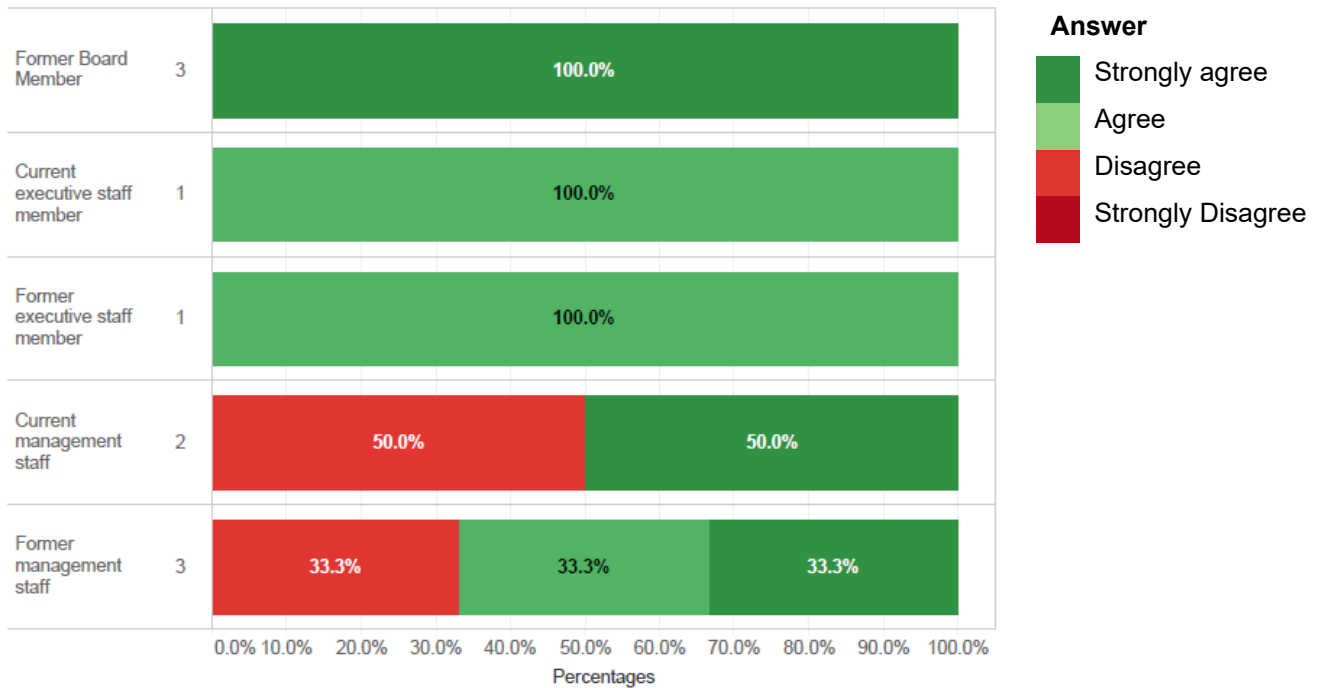
Responses by participant group:



Note: This question was posed to management staff, executive staff and WAIS Board members only.

7.3.3.34 I receive accurate quality reporting on safeguarding issues and risks.

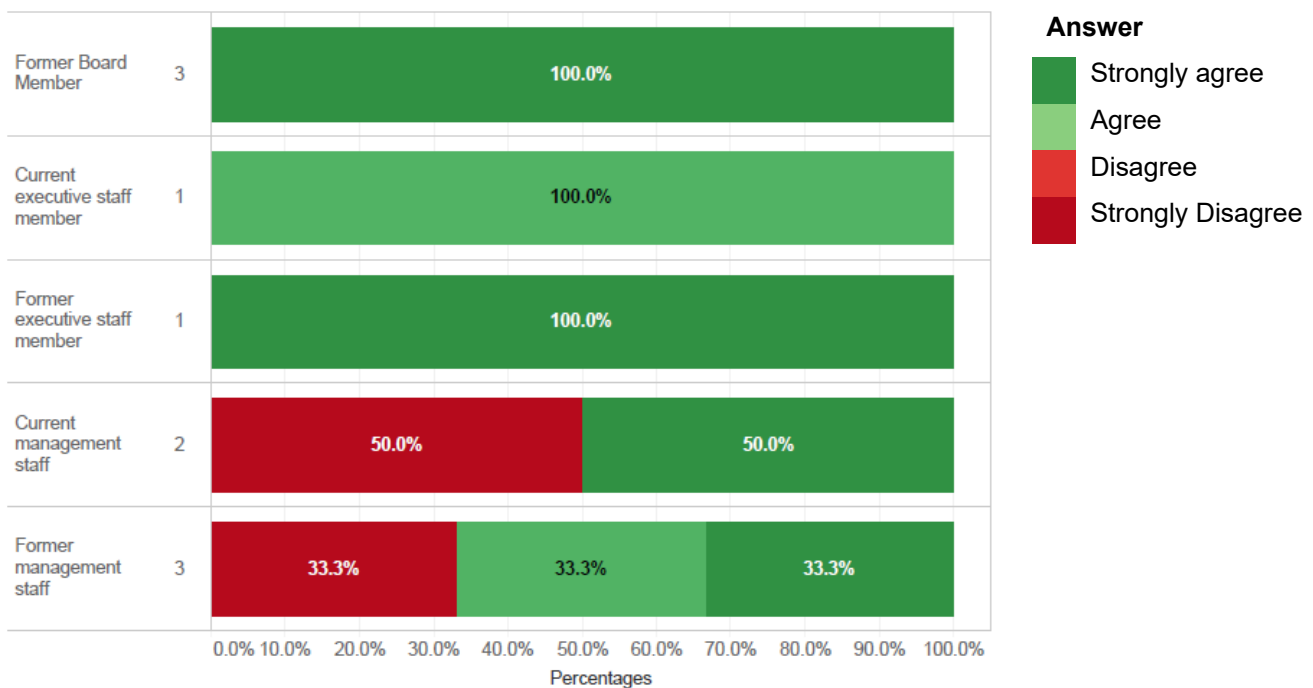
Responses by participant group:



Note: This question was posed to Board members and management only.

7.3.3.35 I feel confident in the level of oversight I have of safeguarding legislative and regulatory requirements.

Responses by participant group:



Note: This question was posed to Board members and management only.

Glossary

Athlete: An individual who participates in a sporting program run by WAIS. This includes individuals engaged within the scholarship program or individuals who engage in a training agreement with WAIS.

Athlete-contact role: A position which is, or is likely to, have in-person and/or digital contact with WAIS athletes in their usual duties of work.

Athlete safeguarding: Safeguarding in the context of the Review is defined as the actions taken to protect athletes, including children and young people, from harm, abuse and threats to their physical, psychological, and emotional wellbeing. The term encompasses both a preventative and reactive response.

Child-related work or Child-related role: Work is child-related work when the usual duties of the work involve, or are likely to involve, contact with a child in connection with a coaching or private tuition service of any kind as per the *Working with Children (Screening) Act 2004*.

Coaches: All members of WAIS coaching staff including head coaches and all other coaches.

Department of Local Government and Cultural Industries (DLGSC): DLGSC is a Western Australian state government Department responsible for local government, sport, culture and the arts. The Minister for Sport and Recreation directed the DLGSC to undertake this review of safeguarding governance and culture across all current elite sporting programs to ensure that it is a safe place for athletes now and into the future.

Grievance officer: Individuals who were accountable for receiving grievances within WAIS. These staff included: the Chief Medical Officer (CMO), People and Community Manager, Corporate Services Manager, Performance Team Director- National, Performance Team Director- Pathways, Performance Team Director- Podium.

National Sporting Organisation (NSO): An independent peak body representing the interests of those involved in their sport in Australia.

Scholarship program: Scholarships provide financial assistance to athletes to manage the expenses associated with their sporting endeavours.

Scholarship athlete/ holder: Athletes are required to meet certain eligibility criteria to become a scholarship holder. A person who is successfully granted access to a scholarship is defined as a scholarship holder/ scholarship athlete. Scholarship athletes have access to funding and a variety of holistic supports, including service providers (allied health staff, medical teams and physical preparation specialists).

Senior Leadership Team: Staff who perform a range of corporate governance functions including overseeing the financial management of WAIS, overseeing WAIS sporting programs and human resources. The Senior Leadership Team comprises the CEO, High Performance Sport Research Centre Director, Performance Team Director National, Performance Team Director Podium, Performance Team Director Pathway, General Manager Corporate Services, Integrity and Safeguarding Manager and People and Community Manager.

State Sporting Organisation (SSO): An independent peak body representing the interests of those involved in their sport in the relevant state or territory.

Staff: This term has been used to describe persons employed by WAIS, including employees in leadership and administrative functions.

Support staff: Staff who provide a variety of multidisciplinary services to athletes, including physical preparation specialist, performance science, movement specialist, athlete wellbeing and engagement staff, psychologists, physiotherapists and dietitians.

Training agreement: A mutual agreement between WAIS and athletes who do not have access to the scholarship program to access WAIS' training environment and to train with scholarship holders.

Training agreement athlete: An individual who does not have access to the scholarship program and has signed a training agreement to access the WAIS training environment in the presence of WAIS staff.

Third-party contractors: Staff who are contracted to perform various WAIS functions, who are not directly employed by WAIS on a permanent full-time basis. For example, external medical or allied health staff, external coaches and facility-hire organisations.

WA Connect Grant (WACG) Athlete: A grant that enables a former or current WAIS athlete, financial assistance to return to home in WA to keep connected with family and friends.

WAIS community: The broader collective of individuals who engage with WAIS, but may not directly partake in sporting programs, for example parents of athletes.

WAIS visiting athlete: a type of training agreement.

Western Australian Institute of Sport (WAIS): A high performance training institute located in Perth, Western Australia, providing athletes with access to training facilities and coaching.

Appendices

Appendix A Terms of Reference

1. Background

On 20 April 2022, Sport Integrity Australia (SIA) published a report detailing its review of the Western Australian Institute of Sport (WAIS) Women's Artistic Gymnastics program (SIA Report).

Based on the information and material SIA collected during this review, it found it was reasonably likely that some gymnasts suffered abuse and/or harm while participating in the Women's Artistic Gymnastics Program at WAIS.

The SIA Report

On 22 June 2022 the Hon David Templeman, Minister for Sport and Recreation, tasked the Department of Local Government, Sport and Cultural Industries (DLGSC) with actions responding to SIA's findings. This included a direction for DLGSC to undertake a comprehensive safeguarding governance and culture review of WAIS.

Media release

DLGSC has commissioned a contractor to independently design and deliver this safeguarding governance and culture review on its behalf, according to the following terms of reference, agreed by DLGSC and WAIS.

Safeguarding in the context of this review is defined as the actions taken to protect athletes, including children and young people, from harm, abuse and threats to their physical, psychological, and emotional wellbeing. The term encompasses both a preventative and reactive response.

2. Objective of the review

The objective of this review was to inform WAIS, DLGSC, and the Minister for Sport and Recreation on areas relating to athlete safeguarding governance and culture at WAIS, both historically (from April 2019) and at that time. This involved identifying any areas WAIS was currently doing well, in addition to areas where there were opportunities for development.

It also included making recommendations for improvement which would support WAIS in providing an environment that was safe for athletes.

The review adopted a balanced approach that encompassed all feedback.

3. Scope of the review

Based on the objective outlined above, the review:

- Examined current governance and culture in relation to the safeguarding of athletes including children, young people, and adults.
- Considered safeguarding policies and procedures at WAIS including any changes or improvements made within the time period, including but not limited to, WAIS' adoption of the Safeguarding Children and Young Policy, Member Protection Policy and Complaints, Disputes and Discipline Policy of Sport Integrity Australia's National Integrity Framework.
- Identified any gaps, concerns and strengths relating to current safeguarding culture and governance at WAIS.
- Made recommendations through a review report to enable:
 - WAIS to provide a safe environment for athletes
 - WAIS' practices, processes, policies and systems align with better practice safeguarding governance and culture, in the high performance sport environment.

The scope of the review is from April 2019 to March 2024 (review period). The following were in scope of the review:

- current and former WAIS athletes, including children and young people
- families of athletes including parents and guardians of athletes under the age of 18 years (at the time they trained at WAIS)
- current and former coaches and WAIS sporting program support staff, such as medical staff and subject-matter experts who have experience at WAIS, including sports psychologists
- current and former WAIS administrative staff, management, senior leadership and board of directors.

For the detailed list of WAIS programs which were operating during the review period, see Appendix B.

4. Scope exclusions

The scope of the review did not include:

- A review of safeguarding culture and governance including programs, policies, and practices at WAIS outside the review period, including the WAIS Women's Artistic Gymnastics (WAG) Program.
- A review of programs or activities not run or managed by WAIS.
- A review of the implementation of SIA Report recommendations.
- A review of the design of the National Integrity Framework, or consideration of areas outside of safeguarding or member protection, including but not limited to, improper use of drugs and medicine, competition manipulation and sport gambling.
- The investigation and/or resolution of individual complaints.
- The consideration of WAIS' organisational governance arrangements outside of governance, oversight and monitoring of safeguarding, such as:
 - establishment (for instance, its status as a body incorporated under the Associations Incorporation Act 2015)
 - effectiveness as a high performance coaching organisation, achieving sporting success
 - financial management.
- Consideration of WAIS' organisational culture outside of safeguarding culture.
- Consideration of policies or procedures which do not relate to athlete safeguarding such as National Integrity Framework's Improper Use of Drugs and Medicine Policy or Competition Manipulation and Sport Gambling Policy.
- Occupational health and safety of WAIS staff unrelated to athlete safeguarding, including bullying and harassment processes.

5. Review process

The review was performed based on the approach outlined below:

- Gathering information via broad and appropriate means which promote access and inclusion, including but not limited to surveys, focus groups, interviews, desktop review of current and historic internal documentation, site visits and written submissions.
- Consideration of a sample of complaints that fall within the scope of the review, to understand the adequacy of the complaints process for athletes (both children and adults), parents or guardians, and staff to raise safeguarding concerns or feedback.
- Analyse the outcomes of information gathering activities to extract insights, themes, root causes and findings.
- Drafting the Interim Status Report and Review Report, as documented below.

6. Interim Status Report

An Interim Status Report was provided to the Minister for Sport and Recreation, DLGSC and WAIS Board with an update on the progress of the review. The Interim Status Report was issued on 15 December 2023. This report did not contain any findings or recommendations, and was limited to providing:

- factual updates on activities conducted
- updates on future planned consultation and other relevant activities.

7. Review Report

This Review Report outlines the outcomes of the review and includes:

- approach taken to complete the review
- findings related to scope areas set out in clause 3
- strengths and areas for improvement

- recommendations to address the areas for improvement.

The Review Report documented thematic findings only and did not present any individual cases or incidents.

A summarised version of the Review Report may be made publicly available.

8. Safe, trauma-informed approach

A safe, trauma-informed approach to the review was embedded by applying the following:

- Anonymity was provided to all participants involved, except in cases involving the management and reporting of disclosures of harm or abuse. Participants were informed during the consent process of the potential need to breach anonymity if certain disclosures are made.
- Person-centred, trauma informed processes were adopted that seek to do no further harm, with appropriate management and reporting of disclosures of harm or abuse, in line with protocols agreed with DLGSC.
- Where appropriate, obtained consent from participants and their guardians where those participants are minors.
- DLGSC afforded participants in the review procedural fairness by treating individuals with dignity and respect, providing them with a voice, and ensuring that the review process was transparent and unbiased.

9. Review outcomes

The outcome of the review is this Review Report containing matters outlined in 7. Review Report to enhance athlete safeguarding governance and culture within WAIS programs.

Having regard to the outcomes sought by DLGSC, WAIS is responsible for taking appropriate actions in response to any findings outlined in the Review Report.

Next Steps

WAIS committed to addressing and providing a formal response to the Review Report and its findings and recommendations within 20 business days of receiving the Review Report from DLGSC.

WAIS' response(s) must specify whether WAIS supports, supports in principle or rejects each of the recommendations. If WAIS is to reject any recommendation(s), WAIS must provide clear rationale as to why.

In the event that WAIS rejects the implementation of any recommendation(s), it is acknowledged that the Minister for Sport and Recreation may have the view that the recommendation(s) should be accepted and implemented; in this event, the relevant parties will negotiate a suitable way forward.

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