KPMG

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

Summary Report*

September 2024

Review completed 28 March 2024 and Final report issued 19 July 2024

*This document provides a summary of KPMG's findings during the course of the work undertaken for the Department of Local Government, Sport and Cultural Industries under the terms of the engagement contract dated September 12, 2023.

Acknowledgments

Acknowledgement of Country

KPMG acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia. 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 n which we operate seriously.

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.

Review 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 longterm impacts of trauma.

We acknowledge the support and collaboration of the Western Australian Institute of Sport. We thank the Department of Local Government, Sport and Cultural Industries for granting us the privilege of conducting this Review.

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

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Disclaimer

This report ('Summary Report') provides a summary of KPMG's findings during the course of the work undertaken for the Department of Local Government, Sport and Cultural Industries under the terms of the engagement contract dated September 12, 2023. The contents of this report do not represent our conclusive findings, which will only be contained in our final detailed Review Report.

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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.

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Background

Elite and high-performance sport is core to 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. By nature, high performance sport inherently encompasses increased mental and physical pressure, power imbalances between athletes, coaches and institutions and 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.

The Western Australian Institute of Sport ('WAIS' or 'the Institute'), positioned within Australia's high performance sport ecosystem, 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.

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.

In 2021 Sport Integrity Australia, a government entity providing national coordination and streamlined integrity support to sports, conducted the Independent Review into WAIS Women's Artistic Gymnastics¹ and in April 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).

¹Sport Integrity Australia, <u>Western Australian Institute of Sport Women's Artistic</u> <u>Gymnastics Program Review</u>, April 2022

²WAIS, <u>WAIS Response To The Sport Integrity Australia WAIS Women's</u> <u>Artistic Gymnastics Program Report Recommendations</u>, May 2022 Prompted by the Sport Integrity Australia 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 recommendations², reflecting a commitment to fostering a safe environment.

Additionally 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, made permanent at the time of writing this report.

WAIS has a number of integrity-related policies and procedures including the Safe and Ethical Practice Policy Framework (SEPPF) introduced in 2019. 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. 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.

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. The Review examined the existing practices of safeguarding governance and culture at WAIS.

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.

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The objective and approach of the Review

Objective and scope

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. Based on the objective, 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
- 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 following stakeholder groups were within the 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 conditioning 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 excluded several areas such as the examination of safeguarding culture and governance at WAIS outside the specified Review Period, or programs not operated by WAIS or programs which operated prior to the Review Period such as the WAIS Women's Artistic Gymnastics Program. Furthermore, the execution, progress and implementation of Sport Integrity Australia Report recommendations, as well as the design of the National Integrity Framework, were not within the scope of the Review. The Review did not investigate or resolve individual complaints, nor did it consider WAIS' broader organisational governance beyond safeguarding. Additionally, it did not consider WAIS' effectiveness as a high-performance organisation, its financial management, or its establishment legislation. The Review did not consider WAIS' organisational culture and policies unrelated to athlete safeguarding, such as those concerning drugs, competition manipulation, and betting, as well as staff occupational health and safety.

The Review's detailed Terms of Reference can be found <u>here</u>.

Approach

01

Development of the Review Methodology and Framework

A Review Methodology was developed to support the undertaking of 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, which was informed by better practice principles.

The Review Framework was categorised by building blocks, enablers, and outcomes and considered the following elements:



Building Blocks

- Leadership and commitment
- · Clarity
- · Risk and compliance

Enablers

- Roles and accountabilities
 - Capability and capacity
 - Person-centred approach

Outcomes

- Monitoring and reporting
- Commitment to safeguarding culture

Figure 1: Overview of the Review Framework

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 mixedmethods approach. Surveys, focus groups and individual interviews were conducted.

Site visits

Site visits were undertaken as part of the Review to obtain an on-the-ground assessment of culture, behaviours and risks.

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Desktop review

A desktop review of WAIS policies, procedures, strategic and guidance documents and system screenshots was conducted 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.

Complaint analysis

Analysis of the complaint handling processes was conducted and informed by written and verbal accounts from WAIS staff.

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Analysis and reporting

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

The Review Report was shared with stakeholders of WAIS to verify its factual accuracy. Subsequently, the finalised report was presented to the WAIS Board and CEO.

This document summarises the outcomes captured in the detailed Review Report.

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Consultation participation

Outlined below is information regarding the stakeholders who participated in consultation via surveys, interviews, and focus groups.





participants responded to online, anonymous **surveys** tailored to their role and involvement with WAIS. WAIS athletes and families, who responded to the survey, were asked to select the option that best describes their relationship with WAIS.

37%	58%	5%
WAIS Training Agreement	WAIS Scholarship Athlete	Other

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Key findings and recommendations

Based on the feedback received during the Review, over the past five years WAIS' safeguarding practices have evolved 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 several safeguarding related policies and safeguarding training and education for WAIS staff. 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, 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 as well as 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 current and former athletes expressed concerns for their safety, sharing times where they did not feel safe at WAIS and reported instances of harm and abuse. All incidents of harm and abuse reported to KPMG were managed in accordance with the established disclosure protocols, referred to the appropriate authorities where necessary, and where relevant were reported to WAIS. Addressing issues documented within the Review Report is essential to ensure the wellbeing and safety of all athletes is paramount.

Aligned to the Review Framework, the Review Report highlighted 14 findings and made 30 recommendations. All findings and recommendations are underpinned by evidence and analysed data, collected throughout the Review. An overview of each finding and relevant recommendations, summarised into four key themes, is overleaf. This Summary Report is a summary of the detailed Review Report.



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Safeguarding culture and commitment

Finding 1.1 Most athletes value their time at WAIS.

Recommendation

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

Finding 1.2 Athlete safeguarding should be promoted as an integral part of the strategic agenda.

Recommendations

- 1.2.1 Set WAIS' athlete safeguarding strategic objectives and priorities.
- 1.2.2 Develop an athlete safeguarding framework.
- 1.2.3 Communicate and clarify WAIS' commitment to athlete safeguarding.
- 1.2.4 Develop a targeted approach to workforce planning to ensure athletes can be supported.

Finding 1.3 Leaders should role model and inspire behaviours which prioritise athlete safeguarding.

Recommendation

1.3.1 Enhance athlete safeguarding role modelling.

Governance

Finding 2.1. Establish governance arrangements to strengthen accountability, oversight and implementation of athlete safeguarding.

Recommendation

- 2.1.1 Establish a governance model and structures that will support the effective oversight of athlete safeguarding.
- 2.1.2 Enhance monitoring and reporting to governance structures.
- 2.1.3 Formalise processes and mechanisms to identify, monitor and adhere to legislative and regulatory obligations.
- 2.1.4 Embed third party contract management.
- 2.1.5 Develop a process to identify, declare, manage and monitor conflict of interest.
- 2.1.6 Enhance data governance.

Finding 2.2 Roles, responsibilities and accountabilities for athlete safeguarding should be defined and documented.

Recommendations

2.2.1 Define roles, responsibilities and accountabilities for athlete safeguarding.

Finding 2.3 Strengthen and embed athlete safeguarding policies and procedures.

Recommendation

- 2.3.1 Conduct a reconciliation of the current suite of policies and procedures.
- 2.3.2 Enhance safeguarding policies and procedures.
- 2.3.3 Enhance policy and procedure version control.

Preventing and responding to complaints, concerns and incidents

Finding 3.1 Enhance risk management strategies to prevent, identify and mitigate safeguarding risks to athletes.

Recommendation

3.1.1 Embed organisational risk management and identify, manage and mitigate athlete safeguarding risks/

Finding 3.2 Barriers to raising concerns and complaints should be addressed.

Recommendations

3.2.1 Improve reporting culture at WAIS.

Finding 3.3 Complaint handling policies and processes must be documented, embedded, well understood and accessible to all.

Recommendation

- 3.3.1 Strengthen complaint management policy, process, and procedure.
- 3.3.2 Establish a child-friendly and age-appropriate complaint process.

Finding 3.4 Apply consistent approaches to holding athletes and staff accountable for unsafe behaviours or conduct inconsistent with WAIS policy and expectations.

Recommendations

- 3.4.1 Embed athlete safeguarding into recruitment.
- 3.4.2 Develop a system to consistently hold people accountable.
- 3.4.3 Embed athlete safeguarding, wellbeing and experience indicators into performance metrics.

Finding 3.5 Athlete safeguarding incident management processes should be established.

Recommendation

3.5.1 Develop an incident management process.

Engagement and awareness

Finding 4.1 Improve athlete safeguarding engagement and awareness for athletes and their families.

Recommendation

- 4.1.1 Improve athlete safeguarding education for athletes and their families.
- 4.1.2 Promote athlete rights within WAIS.
- 4.1.3 Enhance athlete and family engagement.

Finding 4.2 Mechanisms to promote diversity and inclusion should be developed.

Recommendations

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

Finding 4.3 Enhance education for WAIS staff, volunteers, and contractors to uplift awareness and understanding of athlete safeguarding.

Recommendation

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

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Review limitations



The Review has certain limitations that may affect the interpretation of its findings. Although KPMG made efforts to raise awareness and encourage participation, some individuals may not have been aware of the Review or chose not to participate. Participation was voluntary, prioritising a safe and trauma-informed process, but this meant that not all staff and athletes participated in the Review as a result.

Additionally, the statistical significance of the findings was uncertain due to several data limitations, including:

- KPMG were not provided with full information about the stakeholder populations
- there is a potential that some individuals may have engaged with the consultation process more than once
- · there was public yet anonymous access to surveys
- there was no burden of proof required of participant identities.

Therefore, the extent to which the results represent the entire stakeholder group was undeterminable.

Further, procedural measures like guardian consent for minors' participation and a trauma-informed approach aimed to protect participant identities may have resulted in reduced participation levels.

Despite the various limitations, the process was conducted in good faith, with the assumption that participants were sharing sincere insights.



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