

Competition Manipulation and Sports Gambling Policy

Owner: Sport Integrity

CS/SI/0027

Last reviewed: 10/09/2025

Version: 2.00

1 Purpose

Sport Integrity Australia (SIA) developed the National Integrity Framework for a consistent approach to protect sport from integrity threats. In supporting this ethos, the Queensland Academy of Sport (QAS) has developed a suite of sport integrity policies (the QAS Integrity Policies) that meet the Integrity Policy Standards established by SIA and are derived from the National Integrity Framework. The QAS Integrity Policies include:

- Competition Manipulation and Sports Gambling Policy
- Safeguarding Children and Young People Policy
- Participant Protection Policy
- Improper Use of Drugs and Medicine Policy
- Sport Integrity Complaints Policy.

The purpose of this policy is to protect the integrity of the QAS through the prevention, detection, and enforcement of rules relating to the manipulation of sports competitions and associated illicit sports betting activity. Through this Policy, QAS aims to ensure that its values, good reputation and positive behaviours and attitudes are maintained.

2 Statement

The QAS recognises the role it can play in the prevention, detection and enforcement of competition manipulation rules as well as associated illicit sports betting activity. QAS employees undertake education relating to competition manipulation to support them in upholding fair and safe sport as well as the QAS values.

2.1 Prohibited Conduct

A Relevant Person commits a breach of this Policy when they, either alone or in conjunction with another or others, engage in any of the following conduct:

- a) Participate (whether by act or omission) in improperly altering the result or the course of an Activity or Affiliate Organisation Event in order to remove all or part of the unpredictable



nature of the Activity or Affiliate Organisation Event to obtain a Benefit for themselves or others including by¹:

- i) the direct, pre-meditated or planned interference with the natural course of an Activity or element of an Activity or Affiliate Organisation Event²;
 - ii) providing modified or false information related to an athlete's identity or personal information;
 - iii) intentionally modifying playing surfaces, equipment or athlete's physiology to improperly influence the natural course of the event³;
 - iv) engaging in Intentional Misrepresentation, either by deed or omission, in relation to the existence or extent of their skills and/or the nature of their eligible impairment relevant to a Para-sport⁴.
- b) Place or facilitate or assist with the making of⁵ a bet, or enter into any other form of financial speculation, on any Activity or Affiliate Organisation Event, or on any incident or occurrence in an Activity or Affiliate Organisation Event, which they have a direct or indirect connection to. For the avoidance of doubt:
- i) any bets placed by a betting syndicate or group, such as a 'punter's club', of which the Relevant Person is a member;
 - ii) an interest in any bet, including having someone else place a bet on their behalf; or
 - iii) allowing another person to place a bet using a Relevant Person's account, shall be treated as if the bet was placed by the Relevant Person as an individual;

See Appendix B for examples of direct and indirect connection.

- c) Disclosure of Inside Information or Use of Inside Information, other than as required as part of their official duties. Also see Fraud and Corruption Control Procedure;
- d) Accept, request, seek, offer, or provide a Benefit to incite, cause or contribute to any breach of this Policy, or which might reasonably be expected to bring the Relevant Person or QAS into disrepute;
- e) Facilitate, assist, aid, abet, encourage, induce, cover-up or be complicit in any Prohibited Conduct;
- f) Agree, conspire, plan or attempt to engage in any conduct which would be Prohibited Conduct if successful; or
- g) Fail to promptly report to the fullest extent of their knowledge (or of which they ought to have been reasonably aware) to the QAS and if applicable, their responsible Affiliate Organisation if they:
 - i) are charged, or arrested by a law enforcement body as per Section 73 of the Public Sector Act;

¹ 'Improperly' in this context means **not** in accordance with standard sets of behaviour accepted by the QAS. Some practices in a sport may, when applying a strict interpretation without context, be seen as Prohibited Conduct, however, given the behaviour is culturally acceptable among participants and spectators of the sport, this conduct is, therefore, deemed not 'improper'. Refer to **Error! Reference source not found.** for examples of acceptable and improper practices.

² Examples may include, but not limited to, intentionally conceding points, pre-arranging the outcome of a competition, deliberate underperformance (also known as 'tanking') in any manner (through selections or not playing to a person's merits), influencing athlete selections and strategy, or intentional unfair or incorrect officiating. Refer to **Error! Reference source not found.** for examples.

³ For the avoidance of doubt, this does not include any matters dealt with under other relevant policies relating to anti-doping, eligibility, gender identity or selection criteria.

⁴ Intentional Misrepresentation may occur prior to, during athlete evaluation and/or at any point after the allocation of sport class. It may include an athlete or athlete support personnel attempting to deceive or mislead a classifier, classification panel, an International Federation (IF), National Paralympic Committee (NPC) or National Sporting Organisation (NSO).

⁵ Facilitating or assisting includes communicating in any way, including but not limited to in-person communication, using a mobile phone, computer or other electronic device, information that might give another person an unfair advantage if they were to engage in betting related to that information, other than as required as part of their official duties.

- ii) have been approached by another person, whether or not that person is bound by this policy, to engage in Prohibited Conduct in relation to an Activity or Affiliate Organisation Event;
- iii) know or reasonably suspect, that another Relevant Person has engaged in Prohibited Conduct, or has been approached to engage in Prohibited Conduct;
- iv) have, or is aware or reasonably suspects that another Relevant Person has, received actual or implied threats of any nature in relation to any past or proposed Prohibited Conduct; or
- v) have or obtain any new knowledge or suspicion regarding any possible Prohibited Conduct under this Policy, even if the Relevant Person's prior knowledge or suspicion has already been reported.

2.2 Education

- a) In order to prevent breaches of this policy, build positive behaviours in sport and protect participants from the threat posed competition manipulation and associated sports gambling threats, QAS is responsible for developing and implementing an education plan addressing the content and subject matter of this Policy.
- b) QAS may engage SIA to assist in the design, implementation, and maintenance of the education plan and to determine priority education groups and appropriate interventions.
- c) QAS may, from time to time, direct certain Participants to undertake education, which will be relevant and proportionate to their level of participation in QAS Activities and the associated integrity risks.
- d) SIA education resources and training material can be found [here](#).

3 Authority

Public Sector Act 2022

Public Sector Ethics Act 1994

Crime and Corruption Act 2001

4 Scope

This policy applies to the following persons:

- Relevant Persons
- Employees
- Contractors
- QAS Board members

Some Participants will also be bound by their respective sport's Competition Manipulation and Sports Gambling Policy (or equivalent) and will be required to comply with that policy when relevant.

5 Delegations

There are no delegations to be exercised for this policy.

6 Responsibilities

Board

- Ensure QAS has appropriate policies that support sport integrity and competition manipulation and sports gambling that may occur in sport at QAS.

Chief Executive Officer

- Ensure QAS has appropriate guidelines and tools that support sport integrity and competition manipulation and sports gambling that may occur in sport at QAS.
- Liaise with the Sport Integrity Manager regarding the case management approach for any reports or complaints relating to a breach of this policy that is managed under the QAS Sport Integrity Complaints Policy and/or Sport Integrity Complaints Procedure.
- Support, approve or advise key actions and decisions under the policy or the Sport Integrity Complaints Policy.

Senior Leadership Team

- Specific members of the senior leadership team may participate in case management processes as appropriate.

Sport Integrity Manager

- Lead all reports or complaints in line with the Sport Integrity Complaints Policy and/or Sport Integrity Complaints Procedure.
- Liaise with the Chief Executive Officer throughout the case management process including seeking approval for key actions and decisions under this policy or the Sport Integrity Complaints Policy.
- Maintain all files relating to each report or complaint in the approved QAS complaint management system.
- As policy owner, liaise with the relevant High Performance Manager and/or the Para Unit Lead regarding any updates or changes to Intentional Misrepresentation in this policy.

Employees and Contractors

- Ensure they understand how this policy applies to their position, and they are clear on how to meet their obligations under this policy.
- Ensure the timely submission of reports or complaints, as required.
- Maintain confidentiality of all report or complaint processes in which the employee participates.
- Undertake mandatory training (education) on competition manipulation and sports gambling in sport, as required.

7 Reporting requirements

QAS is required to report on customer complaints including those made under this policy. For further details, please refer to the Complaint Management Policy.

8 Information Privacy

- a) QAS may share information they receive relating to competition manipulation and sports betting with Queensland Police Service and relevant law enforcement agencies as defined under the [Information Privacy Act 2009](#).

- b) QAS may also share information or an opinion relating to an individual with an organisation, including SIA, if the individual:
 - i) has consented to the sharing of such information or opinion with the organisation, or
 - ii) is not identified and not reasonably identifiable from the information or opinion to be shared.
- c) All personal information will be managed in accordance with the [Information Privacy Act 2009](#), in particular the Queensland Privacy Principles (QPPs) in that Act.

9 Storage of information

All information will be managed in accordance with the Queensland Government [Information Management Framework](#), which includes the:

- [Public Records Act 2023](#)
- Information Standard 31: Retention and disposal of public records (IS31)
- Information Standard 40: Recordkeeping (IS40).

10 Complaints management

- a) Allegations relating to any form of Prohibited Conduct under this Policy may be submitted to:
 - i) the QAS Sport Integrity Manager via
 - A. the Sport Integrity Report/Complaint Form; or
 - B. in person; or
 - C. a phone call.
 - ii) Allegations relating to Intentional Misrepresentation by a Participant will be managed under their sport's competition manipulation policy.
- b) Any behaviour that may constitute a criminal offence should be reported to Queensland Police Service.
 - i) The complainant should report the offence to Queensland Police Service.
 - ii) Where QAS has reporting obligations, they may report a matter to Queensland Police Service.
- c) Complaints or Reports of Prohibited Conduct under this Policy about a QAS Employee will be managed in accordance with the [Complaints Management Policy](#) in the first instance or where not provided for, the QAS Sport Integrity Complaints Policy. Complaints or Reports of Prohibited Conduct under this Policy for Participants will be managed in accordance with the Sport Integrity Complaints Policy where the matter relates to a QAS jurisdiction and cannot be managed under the Participant's Affiliate Organisation's Competition Manipulation and Sports Gambling Policy (or equivalent).
- d) Notification under clause 2.1 (f) may be made verbally or in writing. Notification to the QAS may be made anonymously.
- e) A person who is dissatisfied with, and is directly affected by, a service, action or decision made by QAS, its staff or persons it has engaged to provide services may lodge a

complaint in accordance with the [Public Sector Act 2022](#) as outlined in the [Complaints Management Policy](#).

- f) If a complainant is dissatisfied with any action taken by QAS in relation to a complaint, and after they have exhausted all available avenues of review within QAS as outlined in the [Complaints Management Policy](#), they can request for QAS' decision to be reviewed by the [Queensland Ombudsman](#).

11 Employee grievances and appeals

An employee who is the subject of an administrative decision or action is entitled to lodge a complaint in accordance with the Managing Employee Grievances Policy should they feel the administrative decision is unfair or biased.

Employees who are unsatisfied with the outcome of their employee complaint may be entitled to lodge an appeal in accordance with [PSC Appeals Directive 04/23](#).

An appeal may be started by giving the Industrial Registrar an appeal notice. Further information on starting an appeal and appeal rights is available from the [Queensland Industrial Relations Commission](#) website.

12 Human rights considerations

There are no human rights identified as being relevant to this policy.

This document was last reviewed in 26/03/2025 to ensure actions and decisions under the policy are made in a manner compatible with human rights. Please note, when implementing this policy, employees must still consider if any human rights are relevant to and likely to be impacted by a particular decision, and whether any limitation of human rights are reasonable and justified.

13 Definitions

Word/Term/Acronym	Meaning
Activity	A sporting contest, match, competition, event, or activity (including training, testing and specialist support provision), whether on a one-off basis or as part of a series, league, or competition, organised or supported by QAS.
Affiliate Organisation	A National Sporting Organisation, State Sporting Organisation or National Institute Network organisation that is officially affiliated with QAS, either through partnership or affiliation agreements with QAS or through the administration of an Activity.
Affiliate Organisation Event	A sporting contest, match, competition or event, whether on a one-off basis or as part of a series, league or competition, organised or supported by an Affiliate Organisation.
Athlete	A person who has a current athlete agreement with QAS.
Benefit	Any advantage and is not limited to property ⁶ .

⁶ A benefit can include, but not limited to; profiting from betting; obtaining an easier draw in the next round of competition; prize money; gifts; winning a title; or ranking points.

Word/Term/Acronym	Meaning
Contractor	Any person or organisation engaged to provide services for, or on behalf of, QAS. • On hired personnel from recruitment agency • Independent contractor (individual or entity) including their sub-contractors, engaged to provide services, such as physiotherapy, nutrition or other professional services. • Consultants
Employee	A person employed at the QAS under the <i>Public Sector Act 2022</i> for services at the QAS. An Employee may be: a) permanent, fixed-term and temporary b) secondees from other agencies (including staffing approved under interchange or mobility arrangements) c) work placement staff (such as trainees, work experience students, cadets) d) students (working at QAS under a university agreement) e) non-executive employees engaged via a fixed term contract f) senior officers and senior executives including those engaged via a section 155 contract. <i>The term staff may be used interchangeably for Employee through this policy.</i>
Inside Information	Any information connected to the conduct, management or organisation of an Activity or Affiliate Organisation Event that is not generally available and if it were generally available, the information, would, or would be likely to, influence a person's decision to bet on the sporting event or in making any other betting decision.
Intentional Misrepresentation	The specific meaning given in the Paralympics Australia Classification Policy as amended or replaced from time to time, but refers in general to an Athlete or Athlete support personnel intentionally misleading, or attempting to mislead, their International Federation or respective National Sporting Organisation or any of their representatives as to any aspect of Para-sport classification, whether by act or omission, or to a person who engages in any type of intentional complicity with such an act or omission.
International Federation	The international federation for a Sport that a National Sporting Organisation is aligned to.

Word/Term/Acronym	Meaning
National Institute Network organisation	The organisations that comprise the National Institute Network in Australia, being the Australian Institute of Sport and the eight State and Territory Institutes and Academies of Sport.
Participant	a) Athletes; b) QAS program coaches appointed to train an Athlete or Team in an Activity or Affiliate Organisation Event; c) any other person who participates in or is involved in running an Activity.
Para-sport	Sport for people with impairments, where this sport is recognised as a Para-sport by the International Paralympic Committee and the authorised International Federation and is delivered by a Paralympics Australia member organisation.
Prohibited Conduct	Conduct proscribed at clause 2.1 of this Policy.
Relevant Person	Any of the following persons: a) Participant; b) Employee; c) Contractor; d) QAS board members e) any other individual who has agreed to be bound by QAS policies.
Sport Integrity Complaints Policy	The policy adopted by QAS for the handling and resolution of allegations regarding Prohibited Conduct relating to this policy by a Relevant Person, Athlete, Relevant Organisation, Contractors and, depending on the conduct, Employees. Allegations against Employees will be considered against and managed as per the QAS' Complaints Management Policy.
Team	A collection or squad of Athletes (persons who have a current athlete agreement with QAS).
Use of Inside Information	Using Inside Information for betting purposes.
Wagering Service Provider	Any company or other undertaking that promotes, brokers, arranges or conducts any form of wagering activity in relation to a sport.

14 Date of effect and review

This policy and its supporting documents:

- come into effect from the date of delegate approval
- will be reviewed
 - within two years of the approval date
 - following a SIA National Integrity Framework review
 - unless otherwise:
 - stipulated in statutory obligations
 - triggered by circumstances determined appropriate by QAS.

15 Delegate approval

DAVID LYONS

Chair

Queensland Academy of Sport Board

Date: 10 September 2025

16 Version history

Version	Date	Author	Amendment description	Action
1.00	06 June 2025	Sport Integrity Manager	New document	Approved by Director-General
2.00	10 September 2025	Sport Integrity Manager	Updates made for statutory body	Approved by the QAS Board

Appendix A: Examples of Prohibited Conduct

1. For the purposes of section 2.1 Prohibited Conduct, of this Policy, examples of Prohibited Conduct whereby a Relevant Person ***participates (whether by act or omission) in improperly altering the result or the course of an Activity in order to remove all or part of the unpredictable nature of the Activity to obtain a Benefit for themselves or others*** include, but are not limited to:
 - a) intentionally conceding points;
 - b) pre-arranging the outcome, or the course of a competition, including through influencing athlete selections and strategy;
 - c) deliberate underperformance (also known as ‘tanking’) in any manner (through selections or not playing to a person’s merits), including for the intention to progress to an easier draw, or for the intention of benefiting a ‘friendly’ opponent;
 - d) intentional unfair or incorrect officiating.
2. However, ***‘improperly’*** in this context means ***not*** in accordance with standard sets of behaviour accepted in the sport of concern in a matter. Some practices in a particular sport may, when applying a strict interpretation without context, be seen as Prohibited Conduct; however, that conduct is in accordance with standard sets of behaviour accepted in that sport. The following does not constitute Prohibited Conduct, including, but not limited to:
 - a) drafting, for example, in an open water swimming race or in a triathlon race;
 - b) selecting specific athletes for a qualification event to maximise entry quotas of the associated club or representative team/squad;
 - c) resting players/athletes for a legitimate competitive objective such as the development of the team or other players, or the management of player fatigue or injuries;
 - d) resting players/athletes from a match or race of a competition to maximise a team performance in the finals; or
 - e) not selecting a player for an entire series or tour to provide them with an extended rest period in preparation for a future series or tour.

Appendix B: Examples of Direct and Indirect Connections for a Relevant Person

1. A Relevant Person has a direct connection to an Activity or Affiliate Organisation Event if they are:
 - a) an Athlete participating/competing in the Activity or Affiliate Organisation Event;
 - b) a coach or support personnel (including QAS Contractors in performance support roles) of a Team or Athlete participating in the Activity or Affiliate Organisation Event;
 - c) a trainer/para-medical of a Team or Athlete participating in the Activity or Affiliate Organisation Event;
 - d) An Employee or Contractor involved in the organisation of the Activity or Affiliate Organisation Event.
2. A Relevant Person has an indirect connection to any Activity or Affiliate Organisation Event. This includes (but not limited to):
 - a) Where the Activity or Affiliate Organisation Event is a single race, match, or competition the Relevant Person does not directly participate in; however, it is a part of a series, tournament, or season competition, of which the Relevant Person participates in, or is directly connected to. For example, if a QAS supported Athlete competes in a beach volleyball series which involves another nine teams in a 10-round draw, that QAS supported Athlete, their coach or support staff are prohibited from betting on any match in the entire beach volleyball series.

For the avoidance of doubt, a Relevant Person does not have an indirect connection with an Activity or Affiliate Organisation Event solely on the basis another Relevant Person competes in that Activity or Affiliate Organisation Event. For example, if a QAS supported athlete competes in a hockey competition, a Relevant Person involved in the sport of surfing does **not** have an indirect connection to any events the hockey athlete competes in.