

Participant Protection Policy

Owner: Sport Integrity

CS/SI/0029

Last reviewed: 10/09/2025

Version: 1.00

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:

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

QAS is required to ensure everyone involved with QAS is treated with respect and dignity and is protected from Abuse, Bullying, Harassment, Sexual Harassment, Discrimination, Victimisation, and Vilification. Creating a safe environment is supported by this policy, other QAS policies as well as the accompanying Sport Integrity Complaints Policy, guidelines and actions to address concerns that are raised with the QAS or by an Affiliate Organisation or Games Time Partner.

2 Statement

The QAS recognises the adverse impact Abuse, Bullying, Harassment, Sexual Harassment, Discrimination, Victimisation, and Vilification can have on someone and is committed to ensuring a safe environment for Employees, QAS-supported athletes and program coaches.

This policy, along with QAS workplace policies for Employees, seeks to ensure that everyone involved with QAS is aware of their rights and responsibilities and sets out the standards of behaviour expected of those involved in QAS and its Activities and the behaviours that are not acceptable (Prohibited Conduct).

2.1 Prohibited Conduct

The application of this policy is defined, guided and supported by the following principles:

A Relevant Person or Relevant Organisation commits a breach of this Policy when they, either alone or in conjunction with another or others, either in-person, online or via any other means of communication, engage in any of the following conduct against one or more Relevant Persons or Relevant Organisations, in the circumstances outlined in the Scope:



- a) Abuse;
- b) Bullying;
- c) Harassment;
- d) Sexual Harassment
- e) Discrimination;
- f) Victimisation; or
- g) Vilification.

The Examples of Prohibited Conduct Guidelines provide examples of what may constitute Prohibited Conduct under this Policy.

2.2 Education

- a) To prevent breaches of this policy, build positive behaviours in sport and protect participants from 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

Anti-Discrimination Act 1991

4 Scope

This policy applies to:

- Employees
- Contractors
- Relevant Persons, Relevant Organisations, and Activities (as defined), including
 - i) dealings with other Relevant Persons or Relevant Organisations or their Employees, Contractors, and representatives;
 - ii) participation or other involvement in Activities (as defined) in general.
- QAS Board members

The following is not within the scope of this Policy:

- a) The interaction (including social media interactions), regardless of whether it occurs after Prohibited Conduct in contravention of this Policy, does not have any link to the conduct of or participation in an Activity, or is not directly related to the QAS.

Note: For application of this policy and supporting documents, the term 'employee' is used collectively to describe persons who perform work for QAS.

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 everyone involved with QAS is treated with respect and dignity and is protected from Abuse, Bullying, Harassment, Sexual Harassment, Discrimination, Victimisation, and Vilification.

Chief Executive Officer

- Ensure QAS has appropriate guidelines and tools that support sport integrity, and everyone involved with QAS is treated with respect and dignity and is protected from Abuse, Bullying, Harassment, Sexual Harassment, Discrimination, Victimisation, and Vilification.
- 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 be engaged as appropriate as part of a case management process.

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 the 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 Principal Governance and Reporting Advisor and Head of Human Resources regarding any updates or changes to 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 participant protection 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 [Complaints Management Policy](#).

8 Information Privacy

All personal information will be managed in accordance with the [Information Privacy Act 2009](#), in particular the Queensland Privacy Principles (QPPs) in that Act. This includes providing personal information, as required under this Policy, with the respective national sporting organisation and SIA.

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) All allegations of Prohibited Conduct under this Policy can be submitted to
 - i) the QAS Sport Integrity Manager via
 - A. the Sport Integrity Report/Complaint Form
 - B. in person
 - C. a phone call.
- b) Allegations of Prohibited Conduct under this Policy will be managed in accordance with the Sport Integrity Complaints Policy or where the allegations relate to an Employee, the QAS [Complaints Management Policy](#) or Investigations and Discipline Directives.
- c) Allegations of Prohibited Conduct under this Policy may also be a breach of a sport's Member Protection Policy (or equivalent). As such a Report or Complaint can instead be submitted to:
 - i. the relevant sport by the complainant alleging Prohibited Conduct under the sport's Member Protection Policy; or
 - ii. SIA by the complainant alleging Prohibited Conduct under the sport's Member Protection Policy where the alleged behaviour relates to Discrimination and the relevant sport has adopted the National Integrity Framework.
- d) 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.

- e) Otherwise, 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

The human rights relevant to this Policy, Protection from torture and cruel, inhumane or degrading treatment; Privacy and reputation; Discrimination and Making a Complaint have been considered. This policy does not limit those human rights.

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, workers 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

The following words have the corresponding meaning in this Policy: Definitions of Abuse, Bullying, Harassment, Sexual Harassment, Discrimination, Victimisation and Vilification must be read in the context of Examples of Prohibited Conduct Guidelines.

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.
Abuse	Any behaviour that involves the misuse of physical or psychological strength or power. This includes verbal abuse.

Word/Term/Acronym	Meaning
Affiliate Organisation	Either a National Sporting Organisation, State Sporting Organisation, National Institute Network organisation, Club, School or University that is officially affiliated with QAS, either through partnership or affiliation agreements with QAS or through the administration of an Activity.
Athlete	a person who has a current athlete agreement with QAS.
Attribute	Includes: a) sex; b) relationship status; c) pregnancy; d) parental status; e) breastfeeding; f) age; g) race; h) impairment; i) religious belief or religious activity; j) political belief or activity; k) trade union activity; l) sex work activity; m) gender identity; n) sexuality; o) sex characteristics; p) family responsibilities; q) association with, or relation to, a person identified on the basis of any of the above Attributes.
Bullying	Repeated unreasonable behaviour directed towards a person or a group of persons that creates a risk to health and safety. Repeated behaviour refers to the persistent nature of the behaviour and can involve a range of behaviours over time. Unreasonable behaviour means behaviour that a reasonable person, having considered the circumstances, would see as unreasonable.
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.

Word/Term/Acronym	Meaning
Discrimination	Direct and indirect discrimination (either in-person or online) which have the following meaning: a) 'Direct discrimination' on the basis of an Attribute happens if a person treats, or proposes to treat, a person with an Attribute less favourably than another person without the Attribute is or would be treated in circumstances that are the same or not materially different. b) 'Indirect discrimination' on the basis of an Attribute happens if a person imposes, or proposes to impose, a term— i) with which a person with an Attribute does not or is not able to comply; and ii) with which a higher proportion of people without the Attribute comply or are able to comply; and iii) that is not reasonable.
Discrimination on the basis of an Attribute	Direct and indirect discrimination on the basis of— a) a characteristic that a person with any of the Attributes generally has; or b) a characteristic that is often imputed to a person with any of the Attributes; or c) an Attribute that a person is presumed to have, or to have had at any time, by the person discriminating; or d) an Attribute that a person had, even if the person did not have it at the time of the discrimination.

Word/Term/Acronym	Meaning
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 throughout this policy.</i>
Games Times Partner	Key sporting organisation partners responsible for Australian teams at Commonwealth Games, Olympic Games and Paralympic Games and includes: • Australian Olympic Committee • Paralympics Australia • Commonwealth Games Australia
Harassment	Behaviour that is unwelcome or unsolicited, offensive, humiliating or intimidating, and relates to someone's personal characteristics such as age, disability, race, nationality, religion, political affiliation, sex, relationship status, family or carer responsibilities, sexual orientation, gender identity or intersex status. Harmful behaviour that does not amount to bullying (such as single instances) but creates a risk to health or safety. It may be directed towards an individual or group of workers, and may be a single act, or an ongoing pattern of behaviour.
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; c) any other person who participates in or is involved in running an Activity.
Policy	This Participant Protection Policy and any appendices.

Word/Term/Acronym	Meaning
Prohibited Conduct	Conduct proscribed at clause 2.1 of this Policy.
Relevant Organisation	Any of the following organisations: a) QAS; b) any organisation that participates in or is involved in the administration of an Activity (including an Affiliate Organisation), in connection with that Activity; or
Relevant Person	Any of the following persons: a) Participant (including Athletes); b) Employee; c) Contractor; d) QAS board member; or e) any other individual who has agreed to be bound by QAS policies.
Sexual Harassment	Any unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, in circumstances where a reasonable person, having regard to all the circumstances, would anticipate the possibility that the person harassed would be offended, humiliated or intimidated. Examples include, but are not limited to: • Unwelcome touching or other physical contact • Intrusive questions about a person's private life or body • Staring or leering at a person or at parts of their body or crude jokes or comments about physical appearance • Insults or taunts based on sex • Talking about sex life or asking about another person's sex life, sexual jokes, suggestive comments or unwelcome sexual propositions • Display of offensive material, offensive phone calls or transmission of offensive sexual material by email, SMS or other social media. Sexual harassment is unethical, unlawful and may be a criminal offence. Sexual harassment is unacceptable in any Queensland public sector workplace.
Sport Integrity Complaints Policy	The policy adopted by QAS for the handling and resolution of allegations regarding Prohibited Conduct under 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, registered with or supervised by QAS or entitled to participate in an Activity.

Word/Term/Acronym	Meaning
Victimisation	Happens if a person (the respondent) does an act, or threatens to do an act, to the detriment of another person (the complainant)— a) because the complainant, or a person associated with, or related to, the complainant— i. refused to do an act that would amount to a contravention of the Anti-Discrimination Act; or ii. in good faith, alleged, or intends to allege that a person committed an act that would amount to a contravention of the Anti-Discrimination Act; or iii. is, has been, or intends to be, involved in a proceeding under the Anti-Discrimination Act against any person; or b) because the respondent believes that the complainant, or a person associated with, or related to, the complainant is doing, has done, or intends to do one of the things mentioned in paragraph (a)(i), (ii) or (iii).
Vilification	There are two types of vilification: a) Unlawful vilification: a public act that incites hatred towards, severe ridicule of, or serious contempt for a person or group because of their race, religion, sexuality, gender identity, or sex characteristics. b) Serious vilification: If unlawful vilification includes a threat of harm to a person or their property, or inciting others to threaten physical harm to a person or their property.
Use	The utilisation, ingestion, injection, or consumption by any means whatsoever of any Illegal Drug.

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	10 September 2025	Sport Integrity	New document	Approved by the QAS Board