



HOCKEY AUSTRALIA

NATIONAL INTEGRITY FRAMEWORK

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Preamble

HA acknowledges that the sport of hockey, like many other sports, is not immune from the risks of corruption, match-fixing, doping, illicit drug use and other issues that jeopardise the integrity of the sport. HA, therefore, seeks to take a proactive approach to mitigate these integrity risks and provide a safe, fair and inclusive environment for all participants at all levels of the sport.

This National Integrity Framework (**Framework**) is the umbrella policy that sets out Australian Hockey's national integrity framework and requirements for ethical behaviour. In Australia, hockey programs, events and activities are implemented and conducted by a number of different hockey organisations across the country. It is the intention that the Framework will be adopted in full by each Australian Hockey Organisation.

This Framework is a comprehensive response to risks to the integrity of hockey. The Framework:

- a. incorporates values and principles that should guide the conduct of Participants, Clubs and Activities;
- b. promotes the development and implementation of clear education and communication strategies;
- c. outlines a policy framework that provides for a safe, fair and inclusive environment in which our sport can be conducted; and
- d. coordinates robust reporting, investigation, hearing and sanctioning processes to deal with Prohibited Conduct and other matters covered by this Framework.

Each AHO acknowledges that many of the issues covered by this Framework may also constitute criminal conduct or be addressed by other government regulations and agencies. All AHOs will cooperate and work closely with law enforcement agencies and regulatory authorities in the application of this Framework.

All Participants should familiarise themselves with this Framework and the Policies.

1. Introduction

- 1.1. HA, Australian Hockey Organisations and Authorised Providers must uphold and maintain the integrity of hockey and protect the health and wellbeing of all Participants in the sport.
- 1.2. Australian Hockey is committed to the highest standards of conduct and ethical behaviour in all of its activities by promoting and supporting a culture of honest and ethical behaviour both on and off the pitch.
- 1.3. This Framework sets out procedures for managing the reporting, investigation and determination of potential breaches of this Framework and the Policies.
- 1.4. AHOs will engage necessary technical expertise to administer, monitor and enforce this Framework and the Policies as required.

2. Jurisdiction

- 2.1. This Framework is made by HA as a policy under Clause 13.2.6 of the HA Constitution. This Framework may be amended by the Board from time to time.
- 2.2. The Board may in its sole discretion, delegate any or all of its powers under this Framework, including but not limited to the power to apply, monitor and enforce this Framework.
- 2.3. Member Associations are expected to adopt this Framework and the Policies, including any amendments required to give effect to the Framework, in full and without material amendment, as a policy under their constitutions within six months of the date it is adopted by the Board.

3. Scope

3.1. Scope

- a. The Framework consists of this document and the Policies. These Policies may be amended by the Board from time to time as appropriate and any amendments will be incorporated into this Framework after being adopted by the Board in accordance with the HA Constitution.
- b. Nothing in this Framework limits the rights or obligations under any other HA policy, code of conduct, Activity rule or relevant agreements.
- c. Prohibited Conduct under this Framework may also constitute a criminal offence or a breach of other applicable laws or regulations. This Framework is intended to supplement such laws and regulations. It is not intended, and should not be interpreted, construed or applied, to prejudice or undermine in any way the application of such laws and regulations. Participants must comply with all applicable laws and regulations at all times.
- d. This Framework does not override or limit the application of Commonwealth, State and Territory laws.
- e. Each AHO:
 - i. Will cooperate fully with any law enforcement agency or regulatory authority investigation into the conduct of Participants, AHOs or Clubs; and
 - ii. May delay or suspend its own investigations under this Framework in accordance with clause 5.5 of the Complaints, Disputes and Discipline Policy.

3.2. To whom the Framework applies

- a. This Framework applies to and binds all Relevant Persons and Australian Hockey Organisations as set out in the Policies.
- b. By registering to participate in an Activity and/or by participating in an Activity, a Participant is deemed to have agreed to be bound by the Framework and consented to the collection, processing, disclosure and use of personal information relating to themselves and their activities, to the extent expressly permitted under the terms of this Framework and in accordance with Australian Hockey Privacy Policy.

4. Prohibited Conduct

4.1. Prohibited Conduct

- a. Any conduct defined or described in this Framework as “Prohibited Conduct” shall be Prohibited Conduct including, but not limited to, conduct in breach of clause 4.1(b).
- b. Participants and AHOs must not and must not direct or arrange any other person to:
 - i. Conduct themselves in any manner, or engage in any activity whether before, during or after an Activity that would impair public confidence in the honest and orderly conduct of the Activity; or
 - ii. Engage in any conduct or activity including, without limitation, making public comment (including on social media) which:
 - A. brings an Australian Hockey Organisation, an Authorised Provider, another Participant or the sport of hockey into disrepute; or
 - B. is or could be harmful to the interests of hockey;
 - iii. Make improper use of information acquired by virtue of their position in any Team selected by an Australian Hockey Organisation or their relationship with an Australian Hockey Organisation to gain, directly or indirectly, an advantage for themselves or for any other person or to cause detriment to an Australian Hockey Organisation;
 - iv. Fail to report any Prohibited Conduct as defined in this Framework or in a Policy to HA or any other Australian Hockey Organisation (or otherwise in accordance with the requirements of the relevant Policy) as soon as reasonably practicable;
 - v. Deliberately or wilfully withhold information in relation to any possible Prohibited Conduct;
 - vi. Knowingly provide any inaccurate and/or misleading information during the course of any investigation or proceedings under this Framework; and
 - vii. Breach or fail to comply with any part of this Framework or any Policy that forms part of this Framework.
- c. Each Policy incorporated within this Framework may also state what constitutes Prohibited Conduct under that Policy.

4.2. Additional Matters

- a. The Anti-Doping Policy will prevail to the extent of any inconsistency with this Framework in all instances. Any allegation relating to a breach or alleged breach of the Anti-Doping Policy will be dealt with under that Policy.
- b. Where conduct may constitute “Prohibited Conduct” under this Framework or any Policy but is a “Protected Disclosure” with respect to HA, it must be dealt with under HA’s Whistleblower Policy.

5. HA Responsibility to Manage Framework

5.1. HA Integrity Unit

- a. HA will ensure that it has an Integrity Unit, headed by a National Integrity Manager who shall report directly to the HA Chief Executive Officer.
- b. The National Integrity Manager is responsible for the implementation, management, reporting and review of this Framework within HA.
- c. The National Integrity Manager will provide the Board with regular reports of:
 - i. Information relating to Prohibited Conduct under the Policies;
 - ii. The operation of and overall compliance with the Policies; and
 - iii. Any other matters arising under the Framework.

5.2. Annual Review

- a. Notwithstanding clause 3.1(a), this Framework and all Policies will be reviewed:
 - i. On an annual basis in consultation with Member Associations and Authorised Providers; and
 - ii. As soon as practicable following release of a new or revised policy template or other relevant publication by a Relevant Government Agency.
- b. The Board shall determine an appropriate time for the annual review of this Framework to occur, taking into account the operational schedule of HA and balancing other organisational priorities.
- c. The HA Integrity Unit shall prepare a report for the Board outlining the findings of the annual review, including a summary of the operations of the Framework and any proposed changes.

5.3. Education

- a. Acknowledging that education is an integral component of an effective integrity framework, HA, in consultation with Member Associations and Authorised Providers, will develop and maintain an education strategy that:
 - i. Incorporates material addressing the matters covered by each Policy under this Framework;
 - ii. Includes a range of education programs and may involve either online or face-to-face learning, or a combination of both;
 - iii. May include programs developed by HA, Member Associations or Authorised Providers for the specific purposes of Participants or resources published by Relevant Government Agencies or other suitable third parties; and
 - iv. Should be reviewed on a biennial basis and should include an analysis of the number of Participants who have completed education programs. This review will be conducted in consultation with Member Associations and Authorised Providers.
- b. Participants shall be required to undertake education programs that are relevant and proportionate to their level of participation in the sport and their vulnerability to integrity risks.
- c. Participants who must complete education and training programs will be directed to do so by HA, Member Associations or Authorised Providers from time to time.
- d. An Australian Hockey Organisation may direct any Participant to undertake additional or specific education programs as deemed necessary and appropriate from time to time. Where the AHO directs a Participant to undertake additional or specific education, they shall specify a reasonable timeframe within which it shall be completed. If the Participant fails to complete the additional or specific education program within the designated timeframe as directed by the AHO they may be suspended by the AHO from participation in any Activity until such time as they have successfully completed the relevant education to the satisfaction of the AHO. The AHO may, however, grant an extension of time to complete the relevant education.
- e. HA may engage third parties to develop, deliver and administer integrity education programs as required.

5.4. Recruitment of Employees and Volunteers

- a. Recruitment procedures for all Employees and Volunteers of AHOs should include adequate background checks appropriate to the position to which they are to be appointed, including but not limited to any relevant Sport Science and Sports Medicine qualifications and police checks. All relevant background checks should be completed prior to a letter of offer being issued to the prospective Employee or engagement being offered to the prospective Volunteer.
- b. All AHOs should undertake induction processes for new Directors, Employees, Contractors and Volunteers that incorporate familiarisation with this Framework and the Policies and completion of other relevant sports integrity education and training as determined by HA from time to time.
- c. Contracts for AHO Employees, Contractors and Volunteers shall include clauses that require compliance with this Framework and the Policies.

6. Additional Responsibilities

6.1. Australian Hockey Organisation Responsibilities

Australian Hockey Organisations shall:

- a. Implement and comply with this Framework;
- b. Ensure that all other policies, rules, and programs that apply to Relevant Persons and Australian Hockey Organisations are consistent with this Framework;
- c. Use their best efforts to assist Participants and other AHOs to fulfil their responsibilities under this Framework;
- d. Publish, distribute, and promote this Framework and the Policies (and any updates from time to time) and shall be responsible for making such documents available and accessible to Participants and other Australian Hockey Organisations;
- e. Ensure its Employees and contractors act in a discreet and confidential manner in discharging their obligations under this Framework;
- f. Recognise any sanction imposed under this Framework and take all necessary steps to enforce any sanction imposed under this Framework;
- g. Recognise and enforce adjudications and penalties enforced by a Relevant Body for offences that are consistent with Prohibited Conduct defined by this Framework;
- h. Impose additional penalties on a Participant for breaches committed in another sport that are consistent with Prohibited Conduct under this Framework; and
- i. Assist in any investigation or proceedings regarding any Prohibited Conduct and ensure that they do not knowingly provide any inaccurate and/or misleading information during the course of any investigation or proceedings.

6.2. Participant Responsibilities

Participants shall:

- a. Make themselves aware of the contents of this Framework that are applicable and relevant to them, including what constitutes Prohibited Conduct under this Framework;
- b. Comply with all relevant provisions of the Framework and the Policies applicable to them;
- c. Comply with any decisions and/or sanctions imposed under the Framework;
- d. Undertake sports integrity education as directed by the National Integrity Manager;
- e. Act in a discreet and confidential manner in discharging their obligations under this Framework;
- f. Submit to the authority of the Board, including as delegated, to apply, monitor and enforce compliance with this Framework;
- g. Assist in any investigation or proceedings regarding any Prohibited Conduct and ensure that they do not knowingly provide any inaccurate and/or misleading information during the course of any investigation or proceedings;
- h. Provide any information or items reasonably requested during any investigation including, but not limited to, copies of or access to telephone records, bank statements, internet services records, computer hard drives, electronic devices or other information storage equipment; and
- i. Submit to the jurisdiction of any hearing tribunal or appeals tribunal convened under this Framework to hear and determine allegations of Prohibited Conduct.

7. Reporting

7.1. A Participant must promptly notify HA if they:

- a. Are interviewed as a suspect, charged, or arrested by police in respect of conduct that would amount to an allegation of Prohibited Conduct;
- b. Are approached by another person to engage in conduct that is Prohibited Conduct;
- c. Have or reasonably suspect that another Participant or Club has engaged in conduct, or been approached to engage in conduct, that is Prohibited Conduct;
- d. Have received, or are aware or reasonably suspect that another Participant or Club has received, actual or implied threats of any nature in relation to past or proposed conduct that is Prohibited Conduct; or
- e. Have received a report of Prohibited Conduct from another Participant.

7.2. A notification made under clause 7.1 may be made:

- a. Directly to the HA Integrity Unit;
- b. To the Independent Reporting Hotline in accordance with clause 7.4; or
- c. If it is a “protected disclosure” under the HA Whistleblower Policy, as a protected disclosure under that Policy.

7.3. Any other report relating to a breach of this Framework may be made:

- a. Directly to the HA Integrity Unit;
- b. To the Independent Reporting Hotline in accordance with clause 7.4;
- c. As a complaint in accordance with clause 3.1 of the HA Complaints and Disputes Policy, unless it:
 - i. Is a “protected disclosure” under the HA Whistleblower Policy in which case it will be dealt with under that Whistleblower Policy;
 - ii. Is subject to mandatory reporting of the matter which is the subject of the complaint under child protection or other laws; or
 - iii. Relates to child abuse, child welfare or the safety of a child or young person under 18 years of age in which case it will be dealt with under the HA Safe Hockey Framework; or
- d. If it is a “protected disclosure” under the HA Whistleblower Policy, as a protected disclosure under that Whistleblower Policy.

7.4. Notification by a Participant under this clause 7 made to the Independent Reporting Hotline at the discretion of the Participant may be made:

- a. By disclosing their identity to the Independent Reporting Hotline;
- b. Anonymously if there is a genuine concern of reprisal. While anonymous reports may be made, they may have significant limitations that inhibit a proper and appropriate inquiry or investigation of the allegations. Therefore, AHOs encourage reports to contain contact details of persons involved and full details of the alleged Prohibited Conduct where possible; or
- c. By disclosing their identity to the Independent Reporting Hotline while remaining anonymous from AHOs.

All information provided must be honest, complete and accurate.

7.5. Reports made:

- a. To the Independent Reporting Hotline will be dealt with under clause 7.6;
- b. Under the Complaints and Disputes Policy will be dealt with under that Policy; and
- c. As a “protected disclosure” under the HA Whistleblower Policy will be dealt with under that Whistleblower Policy.

7.6. Any report made to the Independent Reporting Hotline by a Participant will be passed on to the HA Integrity Unit. Where a Participant has made an anonymous report, the matter will be reported to the Integrity Unit without any personal details. If the report contains information relating to an alleged breach of this Framework or a Policy it will be dealt with confidentially by HA in accordance with clause 2.7 of the Complaints and Disputes Policy.

- 7.7. A Participant has a continuing obligation to report any new knowledge or suspicion regarding any conduct that may amount to Prohibited Conduct, even if the Participant's prior knowledge or suspicion has already been reported.
- 7.8. If a report is made to another Participant, that Participant should report the matter in accordance with this clause 7, noting the fact that it was reported to them by a third party.

8. Investigations

- 8.1. An AHO may conduct an investigation into an alleged breach of the Framework or a constituent Policy by a Participant or Club in accordance with clause 5.2 of the Complaints, Disputes and Discipline Policy.
- 8.2. The HA Integrity Unit may conduct a preliminary investigation:
 - a. To determine if information received by HA is credible and constitutes prima facie evidence that this Framework or one of its constituent Policies has been breached; or
 - b. In the absence of a report, if there is a reasonable suspicion that a Participant or Club may have engaged in Prohibited Conduct.
- 8.3. An AHO, or an external investigator appointed to conduct an investigation into an alleged breach of this Framework or a Policy, may in the course of an investigation:
 - a. Request from Participants and other AHOs copies of all documents, records, articles or things, including but not limited to electronic transmissions, telephone records, banking and financial statements, internet service records and computer and other electronic information storage, in the possession or control of a Participant or AHO that are relevant to the investigation and the Participant or AHO must comply with such request; and
 - b. Require access to the premises occupied by, or in the control of, a Participant or AHO for the purposes of any investigation which must be granted upon request.

9. Resolving Alleged Breaches

Any alleged Prohibited Conduct (including an alleged breach of this Framework, including a breach of a constituent Policy) by a Participant or AHO may be determined in accordance with the Complaints, Disputes and Discipline Policy.

10. Interpretation

In this Framework, unless the context otherwise requires:

- a. Headings are for convenience only and shall not be deemed part of the substance of this Framework or to affect in any way the language of the provisions to which they refer;
- b. Words in the singular include the plural and vice versa;
- c. Reference to "including" and similar words are not words of limitation;
- d. Words importing a gender include any other gender;
- e. Where a word or phrase is given a particular meaning, other parts of speech and grammatical forms of that word or phrase have corresponding meanings;
- f. A reference to a person, corporation, trust, partnership, unincorporated body or other entity includes any of them;
- g. In the event any provision of this Framework is determined invalid or unenforceable, the remaining provisions shall not be affected. This Framework shall not fail because any part of this Framework is held invalid; and
- h. Except as otherwise stated herein, failure to exercise or enforce any right conferred by this Framework shall not be deemed to be a waiver of any such right nor operate so as to bar the exercise or enforcement thereof or of any other right on any other occasion.

11. Definitions

Activity means a hockey contest, match, competition, event or activity (including training), whether on a one-off basis or as part of a series, league or competition, sanctioned by an AHO (for example, international matches, national championships, or domestic leagues).

Administrator means any person HA determines to be an owner, director (including members of management committees), employee, agent, official, support staff, volunteer or other person (including medical staff, physiotherapists or trainers) who has any role in the administration or operation of a Club or a Team associated with or representative of HA, a Member Organisation or an Authorised Provider.

Agent means any person who acts in any way in the capacity of an agent, representative or advisor in relation to the negotiation or execution of any employment or commercial agreement for an Athlete, whether or not that person is accredited to do so by HA or any other body.

Alleged Breach has the meaning given in clause 1 of the Complaints & Disputes Policy;

Anti-Doping Policy means the HA Anti-Doping Policy, as amended from time to time.

Athlete means any person registered with or entitled to play for a Club or listed by HA or a Member Organisation as a member of a national, state or other representative Team.

Athlete and Team Support Personnel means any Coach, trainer, manager, Agent, scientist, statistician, selector, medical or para-medical or other personnel working with, treating or assisting, in a professional or voluntary capacity, an Athlete, Team or Club to prepare for participation in an Activity.

Australian Hockey Organisation or AHO means each of the following:

- a. Hockey Australia;
- b. Member Associations;
- c. Regional Associations, being those regional or metropolitan Hockey associations which are members of, or affiliated to, a Member Association that has adopted this policy;
- d. Affiliated Clubs, being those Hockey clubs which are a member of or affiliated to a Regional Association and/or Member Association that has adopted this policy.

Authorised Provider means the Hockey 1 League Pty Ltd or other organisations from time to time that conduct Activities or any other programs approved by or affiliated in any way with HA or Member Organisations.

Board means the Board of HA.

Club means any club that enters one or more Teams to participate in an Activity and includes a Member Association or other organisation entering a team in an Activity delivered by an Authorised Provider.

Coach includes any coach (whether paid or unpaid) of a Club or a coach of any HA or Member Association national or state Team or the coach of any other representative Team.

Complaints and Disputes Policy means the HA Complaints and Disputes Policy, as amended from time to time.

Contractor means a person or organisation engaged by an AHO on a short-term contractual basis that is not an Employee or Volunteer.

Director means a person appointed to the Board or the board or management committee of another AHO or Authorised Provider.

Employee means a person employed by an AHO or an Authorised Provider.

Framework means this National Integrity Framework.

Hockey Australia or HA means Hockey Australia Limited (ACN 088 988 836) trading as Hockey Australia, which is recognised by Relevant Government Agencies as a National Sporting Organisation and the peak body for the sport of hockey in Australia.

Independent Reporting Hotline means the external (telephone and web) reporting service provided by HA from time to time for the purposes of receiving reports under the Framework.

Member Association means each member of HA recognised under clause 6.1 of the HA Constitution.

Official includes any Umpire, Technical Official or other official (whether paid or unpaid) accredited by an AHO or an Authorised Provider.

Participant means:

- a. Athletes, Athlete and Team Support Personnel, Administrators and Officials participating in or engaged with the delivery of Activities; and
- b. Directors, Employees and Volunteers.

Policy means each of the following sports integrity policies adopted under this Framework:

- a. This Framework document;
- b. Safe Hockey Safe Kids Code (located in the Code of Conduct);
- c. The Safe Hockey Framework;
- d. Member Protection Policy;
- e. Code of Conduct;
- f. Competition Manipulation and Sport Wagering Policy;
- g. Sport Science Sports Medicine Policy;
- h. Illicit Drugs Policy;
- i. Pitchesiding Policy;
- j. Trans and Gender Diverse Guidelines; and
- k. Complaints and Disputes Policy.

Prohibited Conduct means conduct described as prohibited under this Framework and the Policies.

Relevant Body means a law enforcement agency or similar body, sporting organisation or sporting body, international sporting federation or major event organisation which enforces behaviour consistent with the provisions of the Framework.

Relevant Government Agency means the Australian Sports Commission, the Australian Institute of Sport and Sport Integrity Australia and any other state or territory government department that is responsible for the sport portfolio from time to time.

Relevant Person has the meaning given to that term in each Policy, if any;

Team means a collection or squad of Athletes who compete in Activities or train together and includes a national representative team.

Technical Official means a person accredited to manage match scoring, statistics, timing, result systems, interchanges, and/or team benches during an Activity.

Umpire means a person accredited to umpire Activities.

Volunteer means a person engaged directly by an AHO or Authorised Provider in an unpaid voluntary capacity.