



Australian Government

Australian Sports Anti-Doping Authority

REGULATOR PERFORMANCE FRAMEWORK

SELF-ASSESSMENT REPORT

2015–16



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1 INTRODUCTION

This report is presented as a self-assessment of our performance under the Regulator Performance Framework (the Framework) for the period covering 2015-16.

1.1 The Australian Sports Anti-Doping Authority (ASADA)

As Australia's national anti-doping organisation we are responsible for implementing an effective program consistent with international requirements and Australian legislation.

Our purpose is to protect the health of athletes and the integrity of Australian sport through engagement, deterrence, detection and enforcement activities aimed at minimising the risk of doping.

Our role and functions are set out in the *Australian Sports Anti-Doping Authority Act 2006*, the *Australian Sports Anti-Doping Authority Regulations 2006* and the National Anti-Doping (NAD) scheme. To achieve our purpose we carry out a range of activities for the Australian sporting community:

- **Engagement:** Strengthening relationships internally and externally to build anti-doping capabilities and harden the environment against doping in sport.
- **Deterrence:** Minimising the risk of doping through education, communications and testing.
- **Detection:** Gathering intelligence, targeted testing, and investigation of possible breaches of the anti-doping rules.
- **Enforcement:** Managing possible anti-doping violations and presenting cases at hearings and appeals.

1.2 The Report

The Framework forms a part of the Australian Government's commitment to reduce unnecessary and inefficient regulation. As a regulator we are responsible for delivering on this commitment by minimising the burden created through our administration of the statutory framework.

The Framework establishes a common set of outcomes-based Key Performance Indicators (KPI):

1. Regulators do not unnecessarily impede the efficient operation of regulated entities
2. Communication with regulated entities is clear, targeted and effective
3. Action undertaken by regulators are proportionate to the regulatory risk being managed
4. Compliance and monitoring approaches are streamlined and coordinated
5. Regulators are open and transparent in their dealings with regulated entities; and
6. Regulators actively contribute to the continuous improvement of regulatory frameworks.

The KPIs, measures and metrics for ASADA are available on our [website](#) at:

<www.asada.gov.au/about-asada/corporate-information/regulator-performance-framework>

The purpose of this report is to communicate our self-assessment against these KPIs for the period 2015-16.

1.3 Methodology

The evidence presented in this report is predominantly drawn from our annual stakeholder survey of national sporting organisations, athletes and support personnel. The survey was conducted in June 2016 and asked people to assess our work across a range of areas for the preceding 12 months.

The quantitative material captured by the survey is supported, where relevant, by qualitative information describing our work in administering anti-doping regulations.

We have selected the following scale to rate our self-assessment:

Good	Good performance against the measures under the KPI
Fair	Fair performance across the measures under the KPI
Poor	Poor performance against most, or all of the measures under the KPI

1.4 External Validation

The Framework requires regulators to obtain the external validation of self-assessment results. For the purposes of the Framework, external validation provides an avenue for stakeholders to provide feedback on whether the self-assessment results accord with their views of the regulator's performance against the KPIs over the assessment period.

The Minister for Sport has consented to the ASADA Audit Committee to act as external validators of our assessment against the Framework.

It is not intended that external validation by the Audit Committee would involve an audit of the regulator's self-assessment approach or results. The purpose of validation is to act as a quality assurance mechanism for ASADA's self-assessment results prior to them being considered by the Minister for Sport. The Audit Committee's external validation will be submitted to the Minister with this self-assessment report.

2 PERFORMANCE ASSESSMENT

2.1 Key Performance Indicator 1

2.1.1 KPI 1

Regulators do not unnecessarily impede the efficient operation of regulated entities

2.1.2 Measures

- Regulators demonstrate an understanding of the operating environment of the industry or organisation, or the circumstances of individuals and the current and emerging issues that affect the sector.
- Regulators take action to minimise unintended negative impacts of regulatory activities.
- Regulators implement continuous improvement strategies to reduce the costs of compliance for those they regulate.

2.1.3 Metric

- Level of satisfaction of national sporting organisations and athletes regarding the provision of effective advice and support on anti-doping matters.
- Number of anti-doping policies adopted by sports that reflect international and Australian anti-doping obligations.

2.1.4 Evidence

Responses to the 2016 stakeholder survey found:

- 75% of national sporting organisations agreed or strongly agreed ASADA had a good understanding of the conditions facing their sport.
- 88% of national sporting organisations agreed or strongly agreed that ASADA staff are professional in their dealings with them.
- 77% agreed or strongly agreed that ASADA had established a relationship of trust with their organisation.
- 93% agreed or strongly agreed that ASADA's processes are fair.
- As at 30 June 2016, all 94 recognised national sporting organisations had an anti-doping policy approved by the ASADA CEO that reflected international and Australian anti-doping obligations.
- 81% of national sporting organisations felt ASADA had been effective or very effective in ensuring anti-doping policies were up-to-date and reflected the Code and ASADA's legislative framework.

2.1.5 Additional evidence

Engagement with sports is critical to the successful delivery of our anti-doping program. Our operating model strikes a balance between remaining independent, maintaining the confidence of key stakeholders and working collaboratively with partners to minimise the risk of doping in sport.

We are unable to protect the integrity of sport in isolation. We must form and maintain inclusive relationships with sporting organisations and work collaboratively to achieve the best outcomes for Australian athletes. To this end we are in regular contact with a number of sports administrators, legal representatives, support personnel and athlete representatives in the performance of our role.

In 2015-16, we introduced a Sports Engagement Framework to:

- ensure a customised and coherent approach to sports engagement across ASADA
- enable better-planned programs and services to sports and athletes
- provide a holistic and informed response to policy issues; and
- facilitate effective collaboration and information sharing.

Consistent with our Sports Engagement Framework, we met with a number of CEOs and executives of sporting bodies and major events during 2015-16. These meetings were intended to create a shared understanding of the doping risks relevant to each particular sport and enabled sports and ASADA to collaborate in the development of responses to harden against those risks.

We also worked with the Australian Sports Commission to review the performance of recognised sports against a set of key criteria set out in the Mandatory Sports Governance Principles. This process is designed to promote discussion about integrity and anti-doping issues at the executive level of sports, and provided us with the opportunity to explore areas of improvement with individual sports.

We aim for Australian sports to adopt harmonised anti-doping policies so everyone is subject to the same rules. This is expected to provide the consistency and clarity the sporting community needs to address current and future opportunities and challenges.

As a condition of Government funding, all Australian national sporting organisations must have an anti-doping policy approved by the ASADA CEO that complies with the mandatory provisions of the World Anti-Doping Code (the Code) and International Standards, and which acknowledges ASADA's powers and functions under the *Australian Sports Anti-Doping Authority Act 2006* and NAD scheme.

To assist sports meet their obligations, ASADA develops and provides sports with a template anti-doping policy that reflects the mandatory provisions of the Code and ASADA's legislative framework. This reduces the administrative burden on sports that may not have access to resources to develop policies in-line with international and domestic obligations.

2.1.6 Self-assessed rating

Good

2.1.7 Actions for improving performance

The operating model and the Sports Engagement Framework are relatively new additions to our operations and require more time to be embedded into day-to-day processes. Over time it is expected that we will be able to track the progress of our work against this KPI.

The metric relating to anti-doping policies is not seen as a strong measure of performance against this KPI. For this reason it will be removed for future reports. We will consider a suitable replacement for the next reporting period.

2.2 Key Performance Indicator 2

2.2.1 KPI 2

Communication with regulated entities is clear, targeted and effective

2.2.2 Measures

- Regulators provide guidance and information that is up-to-date, clear, accessible and concise through media appropriate to the target audience.
- Regulators consider the impact on regulated entities and engage with industry groups and representatives of the affected stakeholders before changing policies, practices or service standards.
- Regulators' decisions and advice are provided in a timely manner, clearly articulating expectations and the underlying reasons for decisions.
- Regulators' advice is consistent and supports predictable outcomes.

2.2.3 Metric

- Level of participation in ASADA education activities demonstrates a greater awareness of the harms and risks associated with doping in sport.
- Satisfaction with information and resources provided by ASADA.

2.2.4 Evidence

In 2015-16, participants of anti-doping education identified with 91 different sports, the majority of which were recognised by the Australian Sports Commission (ASC) (93%).¹

During the period a total of:

- 15,353 Level 1 and 2 online courses were completed; and
- 6,084 athletes and support personnel attended face-to-face and outreach programs.

There were 9,600 online Level 1 courses completed in 2015-16. This course provided athletes and support personnel with the opportunity to learn about the key areas of anti-doping such as prohibited substances and methods, Therapeutic Use Exemptions, doping control and whereabouts. The objective of the course is that participants build personal awareness of their anti-doping obligations. The 2015-16 completion rate for the online Level 1 course represented a 12% increase over the completion rate for 2014-15. Of the users completing the course during the reporting period, 94% claimed they had learnt something new and 87% found it relevant to their needs.

Of the athletes, support personnel and sports responding to the annual stakeholder survey:

- 89% were satisfied or very satisfied with the ASADA eLearning resource.
- More than 90% were satisfied or very satisfied with the accessibility, delivery, accuracy and currency of anti-doping education.
- 96% of respondents were aware of the harms and risks associated with doping in sport.
- 88% strongly agreed or agreed that ASADA's education and information services had minimised the risk of an accidental breach of the anti-doping regulations by an athlete.
- 86% found ASADA's education program and materials were effective or very effective.

¹ A number of participants completing anti-doping education did not identify with a specific sport. For the purposes of reporting we have only counted those sports specifically identified by participants.

In addition to education, ASADA communicated a range of anti-doping messages to the sporting community throughout the reporting period. A primary source of information for athletes and support personnel during the reporting period was the ASADA website, which experienced a total of 569,383 page views from 143,587 users in 2015-16. Of those who had visited the website and responded to our annual stakeholder survey:

- 89% were satisfied or very satisfied with the ASADA website.
- 87% were satisfied or very satisfied with the ease of understanding the information on the website.
- 87% were satisfied or very satisfied with the relevance of the content in meeting their needs.
- 80% were satisfied or very satisfied with the ease of finding specific information.
- 90% of respondents were satisfied or very satisfied with the online 'Check Your Substances' resource.
- 61% were satisfied or very satisfied with ASADA's social media platforms.

2.2.5 Additional evidence

Nil to report.

2.2.6 Self-assessed rating

Good

2.2.7 Actions for improving performance

The annual stakeholder survey reveals that ASADA's performance in communicating with regulated entities is a strong reflection of its efforts to keep stakeholders well-informed on anti-doping matters.

For future reports we will assess the suitability of the metrics against the KPI and update as necessary.

2.3 Key Performance Indicator 3

2.3.1 KPI 3

Actions undertaken by regulators are proportionate to the regulatory risk being managed

2.3.2 Measures

- Regulators apply a risk-based, proportionate approach to compliance obligations and engagement.
- Regulators preferred approach to regulatory risks is regularly re-assessed. Strategies, activities and enforcement actions are amended to reflect changing priorities that result from new and evolving regulatory threats, without diminishing regulatory certainty or impact.
- Regulators recognise the compliance record of regulated entities, including using earned autonomy where this is appropriate.

2.3.3 Metric

- Delivery of a leading deterrence and detection program, conducted in accordance with ASADA's legislation and the Code, targeted towards sports and athletes assessed as being at greater risk of doping.
- Evaluation demonstrates stakeholders are confident that ASADA's activities reduce the risk of doping in sport.

2.3.4 Evidence

ASADA's operating model identifies sports at risk of doping through an on-going assessment process. These sports become the focus of our attention and tailored anti-doping programs are developed specific to the risk. Through the integration of anti-doping deterrence and detection functions (encompassing education, testing, intelligence and investigations) into a tailored program, we can provide a sport with a more holistic approach to the way it manages the risk of doping.

Of those who responded to our education participation survey, 89% were satisfied with anti-doping education and awareness raising programs.

Of those who had responded to our annual stakeholder survey:

- 83% found ASADA's testing activities and intelligence and investigative functions as effective or very effective.
- 97% of sporting organisations felt that given the level of doping-risk in their sport, the compliance burden imposed on the sport and its athletes by ASADA was tolerable, reasonable or very reasonable.
- 85% of sporting organisations and athletes felt confident or very confident that ASADA's activities reduced the risk of doping in sport.

2.3.5 Additional evidence

During 2015-16, ASADA met with a number of sporting bodies and major event organisers to discuss the anti-doping needs specific to their sports. Significant examples during the reporting period included our work with the Australian Olympic Committee (AOC) and Australian Paralympic Committee (APC) on their Rio 2016 anti-doping programs.

The Rio 2016 anti-doping programs for each of the AOC and APC included:

- tailored online and face-to-face educational activities about specific rights and responsibilities at the Rio Olympic and Paralympic Games
- intelligence-led test plans that considered a range of factors in determining the allocation of tests, including the risk level of sports and athletes
- a targeted testing program beginning more than 12 months prior to the events; and
- the storage of selected samples for future testing.

The Olympic and Paralympic anti-doping programs were designed to maximise opportunities to detect cheating and protect clean athletes.

Our functions are carried out in an environment of sophisticated doping activities and increasing legal challenges to ASADA's investigation and enforcement processes by well-resourced athletes and support personnel. Working in this environment requires us to maintain a robust and flexible risk management strategy.

Our level of risk management capability is aligned with the requirements of section 16 of the *Public Governance, Performance and Accountability Act 2013* and is founded upon principles set out in *ISO 31000 Risk Management – Principles and Guidelines* and the *Commonwealth Risk Management Policy*.

We operate to a Risk Management Framework that embeds risk management in all our operational and corporate activities. We do not view risk management as a stand-alone process. It is entrenched in our business planning and resource processes and is closely aligned with a range of other business processes that are performed within the agency, including fraud control, internal audit and business continuity processes.

2.3.6 Self-assessed rating

Good

2.3.7 Actions for improving performance

Doping in sport carries a high risk for sporting bodies including possible health consequences for athletes, regulatory actions and reputational issues. Experience shows that some sports are more susceptible to doping than others and this knowledge is being incorporated into ASADA's operating model.

The operating model is a relatively new addition to ASADA's operations and requires more time to be embedded into day-to-day processes. Over time it is expected that we will be able to better track the progress of this work against the KPI.

For future reports we will assess the suitability of the metrics against the KPI and update as necessary.

2.4 Key Performance Indicator 4

2.4.1 KPI 4

Compliance and monitoring approaches are streamlined and coordinated

2.4.2 Measures

- Regulators' information/data/sample requests are tailored and only made when necessary to secure regulatory objectives, and only then in a way that minimises impact.
- Regulators' frequency of information/data/sample collected is minimised and coordinated with similar processes including those of other regulators, as far as possible, information is only requested once.
- Regulators use existing information to limit the reliance on requests from regulated entities and share information among other regulators where possible.
- Regulators base monitoring on risk and, where possible, take into account the circumstance and operational needs of the regulated entity.

2.4.3 Metric

ASADA provides national sporting organisations with template anti-doping policies that fulfil the mandatory provisions of the World Anti-Doping Code and ASADA's legislative framework.

2.4.4 Evidence

Of the national sporting organisations responding to the annual stakeholder survey:

- 67% agreed or strongly agreed that ASADA makes information and data requests only when necessary.

As a condition of Government funding, all Australian national sporting organisations must have an anti-doping policy approved by the ASADA CEO that complies with the mandatory provisions of the Code and International Standards, and which acknowledges ASADA's powers and functions under the *Australian Sports Anti-Doping Authority Act 2006* and NAD scheme.

We provide sports with a template anti-doping policy and carry out an extensive consultation process to assist sports comply with this requirement. As at 30 June 2016, all 94 recognised national sporting organisations had an approved anti-doping policy.

Of the national sporting organisations responding to the annual stakeholder survey:

- 81% felt ASADA had been effective or very effective in ensuring anti-doping policies were up-to-date and reflected the Code and ASADA's legislative framework.
- 58% agreed or strongly agreed that the burdens placed on them by ASADA's processes are reasonable and proportionate (a further 28% neither agreed nor disagreed with the proposition).
- 97% felt that given the level of doping-risk in their sport, the compliance burden imposed on the sport and its athletes by ASADA was tolerable, reasonable or very reasonable.

2.4.5 Additional evidence

We base our monitoring of sports on an annual risk assessment, which is the first phase of our operating model. The assessment informs strategy development and allows us to prioritise our resources to those sports rated as having a higher risk of doping. Our work with the AOC and APC in the development of anti-doping programs for Rio 2016 (described in KPI 3 – additional evidence) is an example of this approach in action.

In 2015-16, we also successfully transitioned two of our online systems to capitalise on the enhanced functionality of systems developed by partner agencies overseas. These transitions were aimed at making it easier for Australian athletes to interact with us, as well as obtain vital information to ensure compliance with obligations.

In late 2015, ASADA transitioned all Australian Registered Testing Pool athletes from its Athlete Whereabouts Online System (AWOS) to WADA's Anti-Doping Administration and Management System (ADAMS). This was a crucial step in minimising the burden placed on athletes entering, viewing and changing their whereabouts information.

The other transition involved the replacement of our 'Check Your Substances' online medication search tool with Global DRO. Global DRO provides critical information to athletes and support personnel about the prohibited status of specific substances under the rules of sport, based on the current WADA Prohibited List. The advantage of Global DRO is that Australian athletes can search the status of ingredients and brands of medications that they might encounter outside Australia. This is extremely important with more Australian athletes travelling overseas to train and compete.

2.4.6 Self-assessed rating

Good

2.4.7 Actions for improving performance

While actions are taking place in this area, the results reveal a continued need to focus on opportunities for improvement. We will continue to consider what actions are necessary to improve the outcome in this area.

2.5 Key Performance Indicator 5

2.5.1 KPI 5

Regulators are open and transparent in their dealings with regulated entities

2.5.2 Measures

- Regulators' risk-based frameworks are publicly available in a format which is clear, understandable and accessible.
- Regulators are open and responsive to requests from regulated entities regarding the operation of the regulatory framework, and approaches implemented by regulators.
- Regulators' performance measurement results are published in a timely manner to ensure accountability to the public.

2.5.3 Metric

- Level of satisfaction of national sporting organisations and athletes regarding ASADA's openness and transparency.
- Publication of regulator performance framework (including processes and use of data) applied.
- Timeliness and detail of publication of (targeted and measurable) performance measurement results.

2.5.4 Evidence

Of the national sporting organisations responding to the annual stakeholder survey:

- 93% agreed or strongly agreed that ASADA's processes are fair.
- 82% agreed or strongly agreed that ASADA's processes are transparent.
- 77% agreed or strongly agreed that ASADA's processes are consistent.

The [Framework](#) was published on the ASADA website on 21 August 2015 and is available at: www.asada.gov.au/about-asada/corporate-information/regulator-performance-framework.

Results for this first assessment cycle are scheduled for publication in December 2016.

2.5.5 Additional evidence

Nil to report.

2.5.6 Self-assessed rating

Good

2.5.7 Actions for improving performance

We will continue to monitor activities against this KPI and consider opportunities for improvement.

2.6 Key Performance Indicator 6

2.6.1 KPI 6

Regulators actively contribute to the continuous improvement of regulatory frameworks

2.6.2 Measures

- Regulators establish cooperative and collaborative relationships with stakeholders to promote trust and improve the efficiency and effectiveness of the regulatory framework.
- Regulators regularly share feedback from stakeholders and performance information with policy departments to improve the operation of the regulatory framework and administrative processes.

2.6.3 Metric

- Level of satisfaction of national sporting organisations and athletes regarding the cooperative and collaborative nature of their relationship with ASADA.
- ASADA develops and maintains relevant stakeholder relationships both domestically and internationally to benchmark best practice.

2.6.4 Evidence

Of the national sporting organisations responding to the annual stakeholder survey:

- 88% agreed or strongly agreed that ASADA staff are professional in their dealings with them.
- 82% agreed or strongly agreed that ASADA responsive to their queries and concerns.
- 77% agreed or strongly agreed that ASADA had established a relationship of trust with their organisation.
- 41% agreed or strongly agreed that sporting bodies have enough input into ASADA's processes (a further 36% neither agreed nor disagreed with the proposition).

On the international front, we contributed to global discussions and shared our expertise through participation at a number of international forums and by hosting international delegates in Canberra.

In August 2015, we hosted the German anti-doping agency, Nationale Anti-Doping Agentur Deutschland (NADA) and Drug Free Sport New Zealand (DFSNZ) for a three day education exchange. The meetings, discussions and practical sessions covered all aspects of anti-doping education with a specific focus on eLearning, and how the three organisations could support and assist each other in this area.

On 26 and 27 August 2015, we hosted officials from the Indian National Anti-Doping Agency and WADA to initiate a project whereby we would share with India our expertise in delivering an effective and compliant anti-doping program. In June 2016, the three parties entered into a two-year Memorandum of Understanding to formalise the project.

2.6.5 Additional evidence

The abuse of performance enhancing drugs is an issue that transcends ASADA's interest, and is relevant to a range of law enforcement agencies and regulators within Australia and other anti-doping organisations internationally. In recognition of that, we have pursued partnerships with those organisations that have a common interest in disrupting the abuse of performance enhancing drugs.

Important partnership developments during 2015-16 included:

- Memorandums of Understanding with South Australia Police and the Office of the Victorian Racing Integrity Commissioner
- secondment arrangement with the Australian Border Force, and
- contribution to meetings of the Australian Sports Integrity Network, which is coordinated by the Department of Health.

2.6.6 Self-assessed rating

Good

2.6.7 Actions for improving performance

The results reveal strengths in a number of areas, with a need to consider activities to stimulate input from sporting bodies into ASADA's processes.

3 OVERALL ASSESSMENT

3.1 Analysis of evidence

We work with sports (regulated entities) so they can actively fulfil their role under the national anti-doping framework. Under the framework, all ASC-recognised national anti-doping organisations (and by extension their affiliated State Sporting Organisations/regional sport organisations) are, among other matters:

- required to have an anti-doping policy that complies with the Code, and acknowledges ASADA's powers and functions under the ASADA Act, ASADA Regulations and NAD scheme; and
- required to acknowledge ASADA's functions and powers under the ASADA Act and the NAD scheme and facilitate the execution of those functions and powers as reasonably required by ASADA.

Supporting sports to meet their anti-doping obligations is an important part of our daily work and provides us with the opportunity to reinforce the role they play in the framework.

During 2015-16, we continued to implement our operating model which strikes a balance between our independence, maintaining the confidence of key stakeholders and working collaboratively with partners to minimise the risk of doping in sport. We also introduced a Sports Engagement Framework to enhance our engagement with sports, deliver better-planned programs and facilitate collaboration.

A significant focus of our engagement with sports during the period was our collaboration with the AOC and the APC in the development and implementation of anti-doping programs for Australian teams heading to Rio 2016. The positive partnership resulted in delivering targeted and comprehensive anti-doping programs to athletes competing for Olympic or Paralympic selection. This collaboration achieved a balance between ASADA's requirement for compliance and the AOC and APC's zero tolerance position towards those who choose to gain an advantage through doping.

Anti-doping education is crucial to minimising the risk of doping amongst Australian athletes and as a preventative measure helps reduce the compliance burden on sports. Participants of our education program during 2015-16 completed more than 21,000 sessions and gave the experience an 89% satisfaction rating. In addition to this, almost nine out of ten respondents to our annual survey agreed that our education and information services had minimised the risk of athletes accidentally breaching the anti-doping regulations.

To streamline compliance and monitoring approaches during the period we successfully transitioned our AWOS and 'Check Your Substances' online systems to capitalise on the enhanced functionality of systems developed by partner agencies overseas. These transitions were aimed at making it easier for Australian athletes to interact with us, which in turn reduced the burden placed upon them to comply with anti-doping obligations.

Our overall achievement in minimising the risk of doping in Australian sport must however been seen through the prism of the environment in which we operate. Since the introduction of the revised Code in 2015, national anti-doping organisations globally are facing increasing compliance demands and greater expectations to reduce the risk of doping in sport. We are unable to protect the integrity of sport in isolation, so we must form and maintain inclusive relationships with sporting organisations. Through the establishment of fair, transparent and consistent processes we aim to successfully maintain these relationships. Of the national sporting organisations responding to the annual stakeholder survey:

- 93% agreed or strongly agreed that ASADA's processes are fair.
- 82% agreed or strongly agreed that ASADA's processes are transparent.
- 77% agreed or strongly agreed that ASADA's processes are consistent.

In addition to involvement with sports, we have pursued partnerships with those organisations that have a common interest in disrupting the abuse of performance enhancing drugs. The abuse is an issue that transcends ASADA's interest, and is relevant to a range of law enforcement agencies and regulators within Australia and other anti-doping organisations internationally.

Important partnership developments we pursued in 2015-16 included:

- Memorandums of Understanding with South Australia Police and Office of the Racing Integrity Commissioner; and
- secondment arrangement with the Australian Border Force.

While we have introduced initiatives during 2015-16 to reduce the regulatory burden on our stakeholders, we acknowledge that some of the results from our annual stakeholder survey reveal a continued need to focus on opportunities for improvement. We also acknowledge the need to review some of the existing metrics with a view to developing replacement metrics that better address the measures. This work will be done in the development of our Regulator Performance Framework for 2016-17.

3.2 Overall self-assessed rating

Good