



SAMBO Federation of Australia Limited

sambo.org.au

president@sambo.org.au

team@sambo.org.au

ACN 635 835 120

SAMBO FEDERATION OF AUSTRALIA LIMITED

RISK MANAGEMENT POLICY

Policy Name	Risk Management Policy
Policy Coverage	Risk management, governance, compliance and organisational oversight
Date of Approval	20 September 2025
Approved by	Board of SAMBO Federation of Australia Limited

1. Introduction

1.1 SAMBO Federation of Australia Limited is committed to managing risk in a structured, responsible and proactive manner.

1.2 Effective risk management supports the safe, ethical and sustainable development of Sambo in Australia and assists SAMBO Federation of Australia to meet its governance, legal, financial, operational and sport integrity obligations.

1.3 This Policy establishes the framework for identifying, assessing, managing, monitoring and reporting risks that may affect SAMBO Federation of Australia, its members, athletes, coaches, officials, volunteers, employees, committees, events, programs and stakeholders.

2. Purpose

The purpose of this Policy is to:

- (a) establish a consistent approach to risk management across SAMBO Federation of Australia;
- (b) support informed decision-making by the Board and management;
- (c) protect the health, safety and wellbeing of participants and stakeholders;
- (d) support compliance with legal, regulatory, insurance, governance and sport integrity obligations;
- (e) protect the reputation, assets and financial sustainability of SAMBO Federation of Australia;
- (f) assist the Board and the Finance, Audit and Risk Committee to monitor key organisational risks; and
- (g) support alignment with the Australian Sports Commission's expectations for sound governance and financial management.

3. Scope

This Policy applies to:

- (a) the Board;

- 
- (b) Directors;
 - (c) the Chief Executive Officer, if appointed;
 - (d) employees and contractors;
 - (e) committee members;
 - (f) Member States;
 - (g) Affiliate Members;
 - (h) clubs;
 - (i) athletes;
 - (j) coaches;
 - (k) referees, judges and officials;
 - (l) volunteers;
 - (m) event organisers; and
 - (n) any other person or organisation acting for or on behalf of SAMBO Federation of Australia.

4. Risk Management Principles

SAMBO Federation of Australia will manage risk in accordance with the following principles:

- (a) risk management is part of good governance and decision-making;
- (b) risk management is the responsibility of all persons involved in the organisation;
- (c) risk should be identified and assessed before major decisions, events, programs or commitments are made;
- (d) risks should be managed in proportion to their likelihood and potential impact;
- (e) risk management should support, not prevent, the development of Sambo;
- (f) risks should be monitored and reviewed regularly;
- (g) serious risks should be escalated promptly to the appropriate decision-maker; and
- (h) risk management processes should be documented and transparent.

5. Risk Categories

5.1 Governance Risk

Risks relating to board effectiveness, constitutional compliance, conflicts of interest, poor decision-making, lack of policies, inadequate oversight or failure to meet governance standards.

5.2 Strategic Risk

Risks affecting the ability of SAMBO Federation of Australia to achieve its strategic plan, national development objectives, ASC recognition requirements or long-term sustainability.

5.3 Financial Risk

Risks relating to financial sustainability, budgeting, cash flow, fraud, misappropriation, inaccurate reporting, inadequate controls, insolvency or failure to meet financial obligations.

5.4 Legal and Compliance Risk

Risks relating to breach of laws, regulations, contracts, the Constitution, policies, insurance requirements, privacy obligations, employment obligations or reporting requirements.

5.5 Operational Risk

Risks relating to day-to-day operations, administration, records, systems, communications, membership management, event delivery, staffing, volunteers and technology.

5.6 Sport Safety Risk

Risks relating to athlete safety, injuries, training environments, competition safety, event standards, medical support, equipment, facilities and emergency response.

5.7 Integrity Risk

Risks relating to anti-doping, competition manipulation, sports gambling, improper use of drugs and medicine, member protection, safeguarding, complaints, disputes and discipline.

5.8 Child Safety and Safeguarding Risk

Risks relating to the safety and wellbeing of children and young people, including child protection, working with children checks, reporting obligations and safe recruitment practices.

5.9 Reputational Risk

Risks that may damage the reputation, credibility or public standing of SAMBO Federation of Australia, Sambo in Australia, its members or stakeholders.

5.10 Technology, Data and Privacy Risk

Risks relating to information security, privacy, cyber security, membership databases, personal information, unauthorised access, data loss or misuse of technology.

5.11 Event Risk

Risks relating to competitions, championships, seminars, training camps, travel, national team activities and other events conducted or sanctioned by SAMBO Federation of Australia.

6. Risk Management Process

6.1 Identify Risks

Risks should be identified through:

- (a) Board and committee review;
- (b) strategic planning;
- (c) event planning;
- (d) financial monitoring;
- (e) incident reports;
- (f) complaints and disputes;
- (g) audits and reviews;
- (h) feedback from members and stakeholders;
- (i) legal or regulatory changes; and
- (j) Sport Integrity Australia, ASC or International Federation requirements.

6.2 Assess Risks

Risks should be assessed by considering:

- (a) the likelihood of the risk occurring; and
- (b) the potential consequence if the risk occurs.

Risks may be rated as follows:

Rating	Meaning
Low	Manage through routine procedures
Medium	Requires monitoring and documented controls
High	Requires active management and Board or committee oversight
Extreme	Requires urgent action and immediate escalation

6.3 Manage Risks

Risk treatment options may include:

- (a) avoiding the risk;
- (b) reducing the likelihood of the risk;
- (c) reducing the impact of the risk;
- (d) transferring the risk, including through insurance or contracts;
- (e) accepting the risk where reasonable and documented; or
- (f) escalating the risk to the Board or relevant committee.

6.4 Monitor and Review Risks

Risks must be monitored regularly to ensure controls remain effective.

The risk register should be reviewed at least annually, and more frequently where required.

6.5 Report Risks

Material risks must be reported to the Board or Finance, Audit and Risk Committee.

Serious incidents, urgent risks or risks that may affect legal compliance, participant safety, financial sustainability or ASC recognition must be escalated immediately.

7. Risk Register

7.1 SAMBO Federation of Australia must maintain an organisational risk register.

7.2 The risk register should include:

- (a) risk description;
- (b) risk category;
- (c) likelihood rating;
- (d) consequence rating;
- (e) overall risk rating;
- (f) existing controls;
- (g) further actions required;
- (h) responsible person or body;
- (i) target completion date; and
- (j) current status.

7.3 The risk register must be reviewed by the Board or Finance, Audit and Risk Committee at least annually.

8. Roles and Responsibilities

8.1 Board

The Board is responsible for:

- (a) setting the risk appetite of SAMBO Federation of Australia;
- (b) overseeing the risk management framework;
- (c) ensuring key risks are identified and managed;
- (d) approving this Policy;
- (e) monitoring high and extreme risks;
- (f) ensuring financial sustainability and going concern oversight;
- (g) ensuring appropriate insurance is maintained; and
- (h) ensuring risk management supports the Constitution, strategic plan and ASC recognition requirements.

8.2 Finance, Audit and Risk Committee

The Finance, Audit and Risk Committee is responsible for assisting the Board to oversee:

- (a) financial risks;
- (b) audit and reporting risks;
- (c) internal controls;
- (d) compliance risks;
- (e) fraud and financial integrity risks;
- (f) insurance risks;
- (g) risk register review; and
- (h) risk reporting to the Board.

8.3 Chief Executive Officer

Where appointed, the Chief Executive Officer is responsible for:

- (a) implementing this Policy;
- (b) maintaining the risk register;
- (c) reporting material risks to the Board or Finance, Audit and Risk Committee;
- (d) ensuring staff, contractors and volunteers understand their risk responsibilities;
- (e) ensuring operational risks are managed; and
- (f) ensuring incidents are reported and addressed.

8.4 Directors

Directors are responsible for:

- (a) acting with care and diligence;
- (b) considering risk when making decisions;
- (c) declaring conflicts of interest;
- (d) monitoring governance, financial and strategic risks; and
- (e) complying with the Constitution, Board Charter, Code of Conduct and this Policy.

8.5 Member States and Affiliate Members

Member States and Affiliate Members are responsible for:

- (a) managing risks in their own operations;
- (b) complying with SAMBO Federation of Australia policies;
- (c) reporting serious incidents or material risks to SAMBO Federation of Australia;
- (d) maintaining appropriate records and controls;
- (e) supporting safe delivery of Sambo activities; and
- (f) complying with integrity, safeguarding and anti-doping requirements.

8.6 Coaches, Officials, Volunteers and Participants

Coaches, officials, volunteers and participants are responsible for:

- (a) acting safely and responsibly;
- (b) complying with rules, policies and directions;
- (c) reporting hazards, incidents and concerns;
- (d) protecting the safety and wellbeing of others; and
- (e) cooperating with risk management and incident response processes.

9. Risk Appetite

9.1 SAMBO Federation of Australia recognises that some risk is unavoidable in the development and delivery of sport.

9.2 SAMBO Federation of Australia has a low appetite for risks involving:

- (a) child safety and safeguarding failures;
- (b) serious injury or participant safety failures;
- (c) fraud, corruption or financial mismanagement;
- (d) breach of anti-doping or sport integrity obligations;
- (e) unlawful discrimination, harassment, bullying or abuse;
- (f) serious legal or regulatory non-compliance;
- (g) insolvency or serious financial instability;
- (h) major privacy or cyber security breaches; and
- (i) conduct that may seriously damage the reputation of Sambo.

9.3 SAMBO Federation of Australia may accept carefully managed risks where they support growth, participation, innovation, commercial development or strategic objectives, provided those risks are properly assessed and controlled.

10. Incident Reporting

10.1 Any incident, hazard, complaint, injury, near miss, integrity concern, safeguarding concern or material risk must be reported promptly to SAMBO Federation of Australia or the relevant Member State, club or event organiser.

10.2 Serious incidents must be escalated to the Board, Chief Executive Officer, Finance, Audit and Risk Committee, Sport Integrity Australia, police, child protection authorities, insurer or other relevant authority where required.

10.3 Incident reports should record:

- (a) date and location of incident;
- (b) persons involved;

- (c) description of incident;
- (d) immediate action taken;
- (e) injury or damage sustained;
- (f) witnesses;
- (g) follow-up action required; and
- (h) person responsible for follow-up.

11. Event Risk Management

11.1 SAMBO Federation of Australia must ensure that events conducted or sanctioned by it are planned and delivered with appropriate risk controls.

11.2 Event risk management may include:

- (a) venue safety checks;
- (b) mat and equipment checks;
- (c) first aid and medical arrangements;
- (d) emergency response procedures;
- (e) referee and official appointments;
- (f) athlete eligibility and registration checks;
- (g) child safeguarding controls;
- (h) insurance confirmation;
- (i) incident reporting procedures;
- (j) compliance with rules and event regulations;
- (k) COVID-19 or public health requirements where applicable; and
- (l) any other safety requirements relevant to the event.

12. Financial Risk Management

12.1 SAMBO Federation of Australia must maintain appropriate financial controls.

12.2 Financial controls may include:

- (a) annual budget approval;
- (b) regular financial reporting to the Board;
- (c) segregation of financial duties where practicable;
- (d) approval limits for expenditure;
- (e) bank account controls;
- (f) maintenance of accounting records;
- (g) review of cash flow and solvency;
- (h) audit or review where required;
- (i) fraud prevention controls; and
- (j) Board oversight of major financial commitments.

13. Integrity and Safeguarding Risk

13.1 SAMBO Federation of Australia must manage integrity and safeguarding risks in accordance with

applicable policies and Sport Integrity Australia requirements.

13.2 SAMBO Federation of Australia must maintain or adopt policies dealing with:

- (a) member protection;
- (b) safeguarding children and young people;
- (c) complaints, disputes and discipline;
- (d) anti-doping;
- (e) improper use of drugs and medicine;
- (f) competition manipulation and sports gambling; and
- (g) integrity education.

13.3 Any serious integrity or safeguarding matter must be referred to the appropriate body or authority where required.

14. Insurance

14.1 SAMBO Federation of Australia must maintain insurance appropriate to its operations and risk profile.

14.2 Insurance may include:

- (a) public liability insurance;
- (b) professional indemnity insurance;
- (c) directors' and officers' insurance;
- (d) personal accident insurance;
- (e) workers compensation insurance, where applicable;
- (f) cyber insurance, where appropriate; and
- (g) any other insurance considered necessary by the Board.

14.3 Insurance coverage must be reviewed periodically.

15. Privacy, Data and Cyber Risk

15.1 SAMBO Federation of Australia must take reasonable steps to protect personal information and organisational data.

15.2 Privacy, data and cyber controls may include:

- (a) secure storage of membership and participant information;
- (b) access controls;
- (c) password and system security;
- (d) privacy notices and consent processes;
- (e) secure transfer of information;
- (f) incident response for data breaches;
- (g) regular review of database access; and
- (h) compliance with applicable privacy laws.

16. Compliance

16.1 SAMBO Federation of Australia must take reasonable steps to comply with:

- (a) the Corporations Act 2001;
- (b) the Constitution;
- (c) ASC recognition requirements;
- (d) Sport Integrity Australia requirements;
- (e) FIAS requirements;
- (f) applicable workplace, privacy, child safety and anti-discrimination laws;
- (g) insurance obligations;
- (h) contractual obligations; and
- (i) any other applicable legal or regulatory obligations.

17. Review of Policy

17.1 This Policy must be reviewed at least every two years, or earlier if required due to:

- (a) changes in law or regulation;
- (b) changes to ASC or Sport Integrity Australia requirements;
- (c) serious incidents;
- (d) material changes to SAMBO Federation of Australia's operations;
- (e) audit findings; or
- (f) Board direction.

17.2 Amendments to this Policy must be approved by the Board.

Approval and acknowledgement

Approved by	Board of SAMBO Federation of Australia Limited
Date approved	20 September 2025
Next review date	20 September 2026
Policy owner	Board / Finance, Audit and Risk Committee