

## CHECKLIST: HOW TO COMPLY WITH THE INTERNATIONAL STANDARD FOR TESTING AND INVESTIGATIONS (ISTI) ARTICLE 11

### Background – Objective (ISTI Article 11.1)

ADOs shall ensure they are able to “obtain, assess and process anti-doping intelligence from all available sources, to help:

- deter and detect doping,
- to inform the development of an effective, intelligent and proportionate Test Distribution Plan,
- to plan Target Testing, and
- to conduct investigations as required by Code Article 5.7.

The below checklist identifies what ADOs need to do as a minimum in order to fulfill these compliance requirements in terms of gathering, recording, assessing and the use of of intelligence. This includes:

STEPS 1 and 2 – GATHERING OF ANTI-DOPING INTELLIGENCE (ISTI Art.11.2)

STEP 3 – ASSESSMENT AND ANALYSIS OF ANTI-DOPING INTELLIGENCE (Art. 11.3)

STEP 4 – INTELLIGENCE OUTCOMES (Art.11.4)

*For further guidance, this checklist and its related processes could be developed in conjunction with the WADA ‘Information Gathering and Intelligence Sharing’ Guidelines and Template ‘Policy for gathering intelligence’.*

**Step 1 – what to do in order to capture and receive information (ISTI article 11.2.1)**

Activity	Sub-Activity / Further Guidance	
Identify an individual responsible for the implementation of this Article, being also the central point of contact for independently and confidentially gathering information coming from any source.	<input type="checkbox"/>	
Implement the following three actions, based on the ADOs' specific assessed risks, subsequent priorities, and depending on realistic expectations:	1. <u>Set up a dedicated link or portal</u> (e-mail, hotline, weblink, etc.) accessible from the ADO's' website, allowing anyone to report potential anti-doping rule violations in a confidential and secure manner. When appropriate, an IF can apply to WADA for permission to use the Speak Up! program as proxy for their own doping hotline. Please contact <a href="mailto:whistleblower@wada-ama.org">whistleblower@wada-ama.org</a> , copying <a href="mailto:IFRelations@wada-ama.org">IFRelations@wada-ama.org</a> for additional information on the application process.	<input type="checkbox"/>
	2. <u>Invite internal stakeholders</u> , especially Athletes, Athletes Support Personnel, medical officers, Sample Collection Personnel, to report and direct all information to the responsible individual or by any other mean as set up above.	<input type="checkbox"/>
	3. <u>Stay alerted!</u> When handling the routine anti-doping activities, consider how any available piece of information can potentially become "intelligence" and be included in the intelligence gathering process, including, for example: <ul style="list-style-type: none"> <li>❖ ADAMS whereabouts patterns: regular last minute updates, moving or training in a remote or "high risk" location, frequent withdrawals of expected competitions, whereabouts failures</li> <li>❖ Doping Control Form declarations suggesting non-discretionary use of supplements</li> </ul>	<input type="checkbox"/>

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- ❖ Athlete Passport Management Unit (APMU) and laboratories information: i.e. repeated dilute samples

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*Further best practice: Where appropriate and realistic, consider if more time/resources could be allocated to implement more sophisticated gathering procedures, like detailed performance and results monitoring, proactive search and monitoring activities through the various available sources of information like the press and social media.*

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## Step 2 – What to do in order to handle the information, and document the related policies and procedures (ISTI Article 11.2.2)

Activity	Sub-Activity / Further Guidance
Identify an individual responsible for the implementation of this Article, being also the central point of contact for independently and confidentially gathering information coming from any source.	Organize and maintain secure storage, electronic and physical, with clear determination of who has access. Use encrypted /passwords protected spreadsheets, forms or databases, and/or locked storage room, cabinet, safe box, etc. <input type="checkbox"/>
	Make the responsible individual designated above sign a confidentiality clause / agreement in relation to his/her responsibilities in relation to this article. <input type="checkbox"/>
	Disclose information to other ADO's staff and officers on a strict need-to-know basis only and require that any person who receives such information maintains it in strict confidentiality. <input type="checkbox"/>
Ensure the protection of the sources of intelligence.	This requires that no identity shall be disclosed without prior consent of the source. <input type="checkbox"/>
	<i>Further best practice: where appropriate and realistic, consider separating the functions of intelligence gathering, confidential information management and investigation, in order to maintain the highest protection of the identity of the source.</i> <input type="checkbox"/>
Minimize the risk of leaks or inadvertent disclosure.	The cautious and strict implementation of above steps 2 activities shall minimize that risk. <input type="checkbox"/>
Confirm in writing, and obtain written confirmation from the relevant other party(ies), that all intelligence exchanged will be processed, used and disclosed securely and confidentially only for legitimate anti-doping purposes, that sources are protected, and that risk of leaks or inadvertent disclosure is properly addressed.	<input type="checkbox"/>
Document in writing the procedures described in the above steps.	Using the template "ADO's policy for gathering intelligence" could be an option. <input type="checkbox"/>

### Step 3 – What to do with every piece of information / intelligence received, once steps 1 and 2 are set up and clearly documented

Activity	Sub-Activity / Further Guidance
Evaluate separately the following two criteria a) and b).	a) The reliability of the source <input type="checkbox"/>
	b) The accuracy of the information <input type="checkbox"/>
<i>Further best practice: Employ Admiralty Scale” described in the “Information Gathering and Intelligence Sharing Guidelines Article 5.1”</i>	Then proceed with the “cross-referencing” of criteria a) and b) to assess the overall relevance of the intelligence received. <input type="checkbox"/>
<i>Further best practice: A more in-depth analysis (Article 11.3.2) could be useful to establish patterns, trends and relationships and assist in developing an effective anti-doping strategy or anticipate outcomes.</i>	<input type="checkbox"/>

### Step 4 – How to use the intelligence obtained, recorded, and assessed (Article 11.4)

Activity	Sub-Activity / Further Guidance
Depending on the intelligence obtained, recorded and assessed as per the above steps, at least one of the following three actions shall be considered:	1. <u>Revise the Test Distribution Plan</u> , e.g. allocate more tests to a certain sport or at a certain time. <input type="checkbox"/>
	2. <u>Target test specific athletes</u> <input type="checkbox"/>
	3. <u>Create a file or a report to be referred for further investigation</u> (this might be useful even in the case where no immediate follow-up action is deemed possible or necessary, for example if the assessment in step 3 is not conclusive). <input type="checkbox"/>
	<i>Further best practice: Where appropriate, and subject to applicable law, consider sharing intelligence with other ADOs, law enforcement or other relevant authority, and encourage whistleblowers as outlined within <a href="#">WADA’s Whistleblowing Program</a>. Documenting the related policies and procedures maybe also useful (Art. 11.4.2 and 11.4.3).</i> <input type="checkbox"/>