TEMPLATE: POLICY FOR GATHERING ANTI-DOPING INTELLIGENCE

[INSERT ADO NAME]

***NOTE FOR ADOs:*** *For further guidance, this policy and its related processes could be developed in conjunction with the WADA ‘Information Gathering and Intelligence Sharing’ Guidelines and Checklist ‘How to comply with the International Standard for Testing and Investigations Article 11’. It is important to note that, if you receive information, which requires further investigation follow-up beyond your in-house expertise, you must seek external assistance (e.g., contract an external investigation entity/consultant) to perform appropriate investigative follow-up (as required by ISTI Article 12).*

*Please delete this text box once you have revised this policy.*

**Introduction and Scope**

This policy describes [ADO NAME]’s procedures for gathering and assessing information and intelligence in accordance with Article 11 of the International Standard for Testing and Investigations (ISTI).

**Responsibilities**

[ADO NAME]’s [POSITION TITLE AND/OR NAME] is responsible for the implementation and follow-up of this policy and subsequent procedures.

**[ADO NAME]’s policy for handling anti-doping intelligence**

1. **Security and Confidentiality**

[ADO NAME]’s [POSITION TITLE AND/OR NAME] is bound by a confidentiality agreement in relation to his/her responsibilities under this policy, and ensures that all intelligence received is kept confidential. Any disclosure to other [ADO NAME]’s staff and officers shall be on a strict need-to-know basis only and any person who receives such information shall maintain its strict confidentiality.

1. **Storage of information**

[ADO NAME]’s [POSITION TITLE AND/OR NAME] shall ensure that the collected information and [ADO NAME]’s operational data are handled securely and separately from any other [ADO NAME]’s department or databases, through the following appropriate means:

*[Describe below organizational, technical and physical means as appropriate, for example:]*

* Encrypted / password protected databases, spreadsheets or forms, links analysis software, specific IT equipment;
* Locked storage room or cabinet, safe box. Specifically, all physical evidence (e.g. documents, photos, products, discarded medical equipment, etc.) will be identified, assessed and recorded.
1. **Protection of the sources of intelligence**

Within **[ADO NAME]**’s scope, [POSITION TITLE AND/OR NAME] ensures the protection of the sources of intelligence as deemed appropriate. When proceeding with intelligence sharing or dissemination, no identity shall be disclosed without prior consent of the source.

***[If applicable, describe any other mean /measure ensuring the protection of the sources]***

1. **Risk of leaks or inadvertent disclosure**

In accordance with point 1. above, [POSITION TITLE AND/OR NAME] ensures the minimization of the risk of leaks and inadvertent disclosure of intelligence captured. However, should this occur, [POSITION TITLE AND/OR NAME] shall promptly evaluate the nature of the leak disclosure, the possible negative consequences, and take remediation measures as appropriate. [ADO NAME] shall keep a record of the facts relating to the leak or disclosure, its effects and remedial actions taken.

*[In case documents are leaked, conducting a further internal audit or assessment maybe useful to determine the risks and to assess any measures that could be taken to reduce those risks. If applicable, describe the internal audit process here].*

1. **Shared information**

Where intelligence is shared with [ADO NAME] by other parties such as health, law enforcement agencies, sports organization, other Anti-Doping Organizations, etc., [POSITION TITLE AND/OR NAME] will confirm in writing to such other parties that all intelligence received is processed, used and disclosed according to the procedures set out in points 1, 2 and 3, and only for legitimate anti-doping purposes.

Where intelligence is shared by [ADO NAME] with other parties, [ADO NAME] will require the same written confirmation from such other parties.

*[If applicable, describe any other mean /measure reinforcing this commitment, for example: cooperation agreement, memorandum of understanding].*

The [ADO NAME] will use secure communication tools when transferring any confidential information to external parties.

**Gathering, assessment and use of anti-doping information (intelligence)**

1. **Information sources and whistleblowers reporting tools**

*[Briefly list or describe below the various sources available depending on the specific nature and priorities of the ADO, as well as realistic expectations. For example:]*

Internal or “closed” sources (where access is restricted) include: ADAMS, Athlete Passport Management Unit (APMU), other ADOs, WADA, laboratories, law enforcement, health agencies, sample collections agencies’ Doping Control Officers (DCO), chaperones, whistleblowers reports (e.g., confidential reporting by Athletes or Athlete Support Personnel), [ADO NAME]’s Medical/Anti-Doping officers, Code “Substantial Assistance” provision, etc.

External or “open’ sources (publicly available information) include: Internet, traditional and social media, research and academic publications, sports news and forums, etc.

*[Describe below the available whistleblowers reporting tools. For example:]*

A dedicated e-mail address, [ADO NAME]’s website specific platform or WADA “Speak Up” platform.

*[Please note that the direct access to the WADA ‘Speak Up’ platform from an ADO’s website is subject to WADA’s permission. Please contact* *whistleblower@wada-ama.org**, (copying* *IFRelations@wada-ama.org* *in the case of an International Federation) for additional information on the application process]*.

1. **Collation and assessment**

[POSITION TITLE AND/OR NAME] first evaluates the reliability of the source, then assesses the accuracy of the information itself.

*[As appropriate, describe briefly below the method used for these two processes. The “Admiralty Scale” approach described in Art.5.1 of the “Information Gathering and Intelligence Sharing Guidelines” may be of assistance]*

1. **Processing and outcomes**

Taking into account the evaluation and assessment above, and other relevant factors indicating potential risks of doping, such as those identified in the [ADO NAME]’s risk assessment, [POSITION TITLE AND/OR NAME] determines follow-up action(s) such as:

1. conducting target testing,
2. conducting further investigation on a particular case,
3. establishing trends or patterns for reviewing the Test Distribution Plan, and/or,
4. creating files to be referred for future investigations.

Where appropriate, sharing information with other parties such as law enforcement or other ADOs with jurisdiction can be considered, with [POSITION TITLE AND/OR NAME] ensuring that at least the similar requirements as per point 4 “Shared Information” above are fulfilled by the other party.