

Summary of Audit Outcomes

Audit details

Signatory	Dates of Audit	Type of Audit	Scope of Audit
ADAK – Anti-Doping Agency of Kenya (Kenya NADO)	7-9 May 2024	In-person <input checked="" type="checkbox"/> Virtual <input type="checkbox"/> Desk <input type="checkbox"/>	Full Audit <input checked="" type="checkbox"/> Partial Audit <input type="checkbox"/>

Background of the audit

The audit was proposed by WADA's internal Compliance Taskforce and endorsed by the Compliance Review Committee (CRC) based on the monitoring process outlined in the International Standard for Code Compliance by Signatories (ISCCS), specifically Articles 7.2.1 and 7.2.2. WADA officially notified Kenya NADO of the audit on 7 March 2024.

The Lead Auditor communicated with Kenya NADO via email to provide initial details and a draft audit plan, and on 10 April 2024 held a teleconference to discuss the objectives of the audit, the audit plan, logistical details, and to confirm the availability of all Kenya NADO staff and documentation during the period of the audit.

Methodology

To prepare for this audit, the audit team used data held by WADA, including ADAMS, Gracenote, and the legal department's database, as part of its review of Kenya NADO's anti-doping program. Furthermore, WADA requested that Kenya NADO provide a number of documents in advance of the audit.

From the discussions, interviews, observation of procedures and review of documents provided by Kenya NADO during the audit, it was apparent that Kenya NADO had prepared for the audit and was open in the discussions. Staff and documents were available to the audit team during the audit.

Table of findings

Date Updated:	3 September 2025			
Program Area	Critical Findings	High Priority Findings	General Findings	Total
	(completed and signed off)	(completed and signed off)	(completed and signed off)	(completed and signed off)
Governance	1 (0)	-	-	1 (0)
Testing	4 (1)	4 (3)	-	8 (4)
Intelligence & Investigations	-	1 (1)	-	1 (1)
Results Management	9 (5)	4 (3)	3 (3)	16 (11)
Therapeutic Use Exemptions	-	-	-	-
Education	1 (1)	1 (1)	-	2 (2)
Data Privacy	-	-	7 (7)	7 (7)
Total	15 (7)	10 (8)	10 (10)	35 (25)

Summary of findings¹

Critical findings

1. It was apparent from the discussions that Kenya NADO requires more financial and human resources in order to deliver an effective anti-doping program.
2. It was identified that Kenya NADO had not entered all Doping Control Forms (DCFs) within 21-days of sample collection and that additional errors were found on other DCFs requiring attention.
3. Although Kenya NADO had completed a testing risk assessment, it did not meet the requirements of the International Standard for Testing and Investigations (ISTI), including, the quantitative analysis required, the final risk scores and the frequency of updating the risk assessment.

¹ The following is a summary of the key findings of the audit as opposed to an exhaustive list of all findings. In respect of each finding, WADA required a specific corrective action to be undertaken in order to avoid similar issues in the future.

4. The Test Distribution Plan (TDP) was not aligned with the risk assessment and the implementation of tests was not in line with the plan due to budget constraints. In addition, it was observed that out-of-competition testing was frequently conducted in large groups reducing the unpredictability of testing.
5. Shortfalls were identified in the administration of the Registered Testing Pool (RTP) as detailed in the ISTI, including, the criteria for inclusion, the notification process for athletes of their inclusion and removal, the systematic review of whereabouts filings and insufficient tests on RTP athletes.
6. Kenya NADO's various results management notices and notifications did not contain a number of the mandatory requirements as detailed in the International Standard for Results Management (ISRM). In addition, Kenya NADO did not always notify WADA or the relevant International Federation.
7. It was evident that mandatory provisional suspensions are not consistently imposed.
8. In general, Kenya NADO's result management cases are not managed in a timely manner in line with the ISRM. This includes Atypical Findings (ATFs) which are not investigated timely, including follow up sample collections required and the relevant notifications to the relevant Anti-Doping Organization (ADOs) whether or not the ATF will be brought forward as an Adverse Analytical Finding (AAF).
9. Kenya NADO did not issue whereabouts decision in accordance with the ISRM, nor upload decisions and notices into ADAMS. In addition, the notice of a potential filing failure does not advise the athlete that in order to avoid a further filing failure they must file the missing whereabouts information by a deadline which must be within 48 hours.
10. Decisions from the Sports Dispute Tribunal do not consistently include justifications for the reduction of a period of ineligibility as required in the Code and ISRM. In addition, Kenya NADO did not issue a reasoned decision when it was agreed with the athlete on a period of ineligibility.
11. The Kenya NADO did not provide all mandatory education information on its website as required by the Code, including information on anti-doping rule violations.

High priority findings

1. It was identified that on a number of occasions, Athlete Passport Management Unit (APMU) recommendations had not been followed by Kenya NADO.
2. During observations made during sample collection sessions, a number of procedural shortfalls were observed as well as sample collection personnel not using the latest versions of doping control documentation. The Doping Control Manual used as a reference for its sample collection personnel also contained certain procedures that were not fully in line with the ISTI.
3. Kenya NADO did not systematically conduct certain investigations required when athlete support personnel are involved in anti-doping rule violations.
4. Sport Dispute Panel members had not signed certain declarations of impartiality.
5. It was identified that Kenya NADO was not uploading its results management decisions into ADAMS and were not always notifying WADA that an appeal had been filed as required by the Code.

6. Although Kenya NADO had an education plan it did not meet all the requirements of the International Standard for Education (ISE) when it comes to evaluating the plan.

General findings

1. It was observed that Kenya NADO did not ensure the confidentiality of the results management process at all times, nor check with the relevant International Federation if an athlete has a prior anti-doping rule violation before issuing a notice of charge and had not assigned staff to conduct administrative reviews of whereabouts failures.
2. In the area of data privacy a number of findings were identified.

Conclusion

The Kenya NADO recorded a significant number of findings, many resulting from a lack of human and financial resources at the time of the audit. The majority of findings were identified in the area of results management, with 16 findings identified, including nine of which were critical in nature and required urgent correction. These findings related to mandatory elements that were missing in results management notifications, a lack of consistency with respect to provisional suspensions, delays in results management and a failure to (timely) investigate certain matters.