

Summary of Audit Outcomes

Audit details

Signatory	Dates of Audit	Type of Audit	Scope of Audit
NADO Vlaanderen (NADO Flanders)	31 March and 1 April 2025	In-person ☒ Virtual ☐ Desk ☐	Full Audit ☒ Partial Audit ☐ If partial audit, program areas audited:

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 NADO Flanders of the audit on 31 January 2025.

The Lead Auditor communicated with NADO Flanders via email to provide initial details and a draft audit plan, and on 10 March 2025 held a teleconference to discuss the objectives of the audit, the audit plan, logistical details, and to confirm the availability of all staff of NADO Flanders 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 NADO Flanders' anti-doping program. Furthermore, WADA requested that NADO Flanders provide a number of documents in advance of the audit.

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

General findings

Date updated: 10 October 2025				
Program Area	Critical Findings	High Priority Findings	General Findings	Total
Governance	-	-	-	-
Testing	7	5	-	12
Intelligence & Investigations	-	-	-	-
Results Management	4	5	-	9
Therapeutic Use Exemptions	1	-	-	1
Education	-	1	-	1
Data Privacy	-	-	3	3
Total	12	11	3	26

Summary of findings¹

Critical findings

1. NADO Flanders had not entered all Doping Control Forms (DCFs) into ADAMS within the 21-day requirement from sample collection, as required in the International Standard for Testing and Investigations (ISTI). In addition, some data entry errors were identified, leading to certain samples not being matched in ADAMS.
2. Although NADO Flanders had conducted a testing risk assessment, it did not fully comply with the ISTI. The risk assessment also did not include a certain number of sports and sport disciplines in which athletes perform at national and international level in Belgium.
3. The Test Distribution Plan (TDP) was not aligned with the risk assessment as required in the ISTI. The TDP also did not prioritise between sports and/or sport disciplines, nor did it determine what types of testing are required in an order of priority to detect and deter doping practices within sports/sport disciplines. NADO Flanders did not sufficiently prioritize between different athletes for the purposes of target testing. It was also unclear how many national-level athletes were subject to in-competition testing.

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 criteria for inclusion in NADO Flanders' Registered Testing Pool (RTP) and Testing Pool (TP) could not be updated as needed due to regulatory factors. NADO Flanders did not plan to collect three or more Out-of-Competition (OOC) tests per year from athletes in its RTP and insufficient samples were collected on several TP athletes, contrary to the ISTI.
5. Notifications for whereabouts cases did not include all the requirements outlined in the International Standard for Results Management (ISRM).
6. The first instance hearing panel (the "Disciplinary Commission") did not fully satisfy the requirements of operational independence as required by Code Article 8.1 in relation to the involvement of a NADO staff member in the hearing process. In addition, members of the hearing panels in the first instance and on appeal did not sign a declaration of conflict of interest per case, as required in the ISRM.
7. The audit team noted that in some cases, NADO Flanders did not ensure that Results Management decisions were uploaded into ADAMS and shared with relevant parties within a reasonable delay, as required in the ISRM.
8. The members of NADO Flanders' Therapeutic Use Exemption Committee (TUEC) had not signed conflict of interest and confidentiality declarations, as required in the International Standard for Therapeutic Use Exemptions (ISTUE).

High priority findings

1. NADO Flanders did not coordinate its testing efforts with other Anti-Doping Organizations (ADOs) with overlapping testing authority to maximise the effectiveness of those combined efforts, to avoid unnecessarily repetitive testing of particular athletes and to ensure athletes competing at international events are suitably tested in advance, as required in the ISTI.
2. NADO Flanders did not follow up on Athlete Passport Management Unit (APMU) target testing recommendations, as required in the ISTI.
3. While NADO Flanders uses temperature loggers to record the temperature of blood samples from sample collection to analysis, the test data in ADAMS for blood Athlete Biological Passport (ABP) samples collected in recent years did not consistently have the temperature logger ID, as required in the ISTI.
4. Most, if not all OOC missions conducted by NADO Flanders on RTP athletes were conducted within the athletes' respective 60-minute time slots and/or immediately before or after the athletes' 60-minute time slots, which is contrary to the ISTI.
5. The RTP inclusion letter of the NADO Flanders did not allow an RTP athlete to use their overnight address or training location for their 60-minute timeslot, as permitted by the ISTI, although in practice the audit team noted that athletes could in fact do so.
6. When an athlete was unable to produce valid identification, NADO Flanders' protocols to validate the identity of the athlete selected to provide a sample are not in line with the ISTI.

7. Notifications of an apparent Anti-Doping Rule Violation (ADRV) and notices of charge were not communicated to all relevant parties simultaneously, as required by the ISRM. The notification of an apparent ADRV also did not contain sufficient information regarding substantial assistance as required in the ISRM.
8. The audit team identified that the NADO Flanders does not always follow the requirements of the ISRM in whereabouts cases, as was highlighted in the case of an athlete who was informed that the whereabouts failure was recorded through the first notification and was then given the opportunity to contest such decision.
9. Athletes or other persons were not always informed of the composition of their panels and were prevented from opposing the composition of the panel, contrary to the ISRM.
10. The appeal panel was not operationally and institutionally independent as required by Code Article 13.2.2 due to the presence of a member of NADO Flanders who acts as a secretary for the appeal panel.
11. The NADO Flanders TUE application form did not contain several mandatory requirements found in the TUE application form template on WADA's website, which is contrary to the ISTUE.

General findings

1. In the area of data privacy three findings were identified.

Conclusion

The NADO Flanders recorded a high number of findings during its audit. Shortfalls were identified mainly in Testing and Results Management, with 12 (seven critical) and nine (four critical) corrective actions respectively. Some key findings relate to the complexity of the legal framework as well as the anti-doping landscape in Belgium, which is the only country that does not have a single, centralized NADO. It is recommended that the four NADOs of Belgium attempt to streamline their activities in a more efficient manner.