

Intelligence and Investigations Department

Annual audit conducted by Independent Supervisor from 15 – 18 April 2019

In keeping with article 9 (a) of [WADA's I&I Policy](#), on an annual basis, an Independent Supervisor is required to conduct an audit of the I&I Department.

Such audits are intended to ensure that the department's work continuously and rigorously satisfies best practices, follows the applicable laws and regulations, and protects the rights and privacy of individuals.

Once a year, the Independent Supervisor is required to submit a written report to WADA's Director General and Executive Committee (ExCo) and, once approved by the ExCo, the conclusions of the report are to be made public on WADA's website.

Outlined below are the report's 'conclusions and potential improvements' concerning the second annual audit conducted by Independent Supervisor, Mr. Jacques Antenen, from 15 – 18 April 2019. Mr. Antenen is currently Commander of the Vaud Cantonal Police in Switzerland. He is a former Investigating Judge of the Canton of Vaud and Special Federal Prosecutor of the Swiss Confederation. Note: It is an English translation of the French original.

Audit report conclusions — potential improvements

A. As it relates to the department

1. Hire additional resources in keeping with the four-year plan proposed by the department and adjust the department's budget accordingly.

Tangibly, this means that three people need to be hired as soon as possible. The compliance unit issue is pending.

2. Need to physically separate the premises occupied by the CIM [Confidential Information Manager]. The CIM works with WBs [Whistleblowers] and, for obvious reasons of confidentiality, needs an appropriate, private work area.

This recommendation is taken word for word from my 2018 report. However, the required changes have not been made and it is important that they are.¹

3. Ultimately, according to Gunter Younger, a compliance unit should be created within the department. Like the investigation teams, it should be made up of an investigator and an analyst.

¹ WADA acknowledges this situation and it will address it as soon as possible.

B. As it relates to the supervisor

1. Even though their numbers were limited, the department was able to benefit from reinforcements during the year. The department is now better structured and better organized. The hiring of an initial CIM has improved the unit's coherence, by relieving the director of the heavy load of managing WBs. The new coordinator's job description needs to be adapted.
2. Taking into account the resources available to the department, the quality of its work remains exceptional. The qualifications of the team members recruited are truly impressive, as is team spirit.
3. The lack of resources, which is highlighted several times in this report, remains acute.

The goal of having four investigation teams in the short term must remain a priority.

For the credibility of anti-doping, it is also essential to process all sources of information. That is not currently possible. It is therefore very important to hire a second CIM.

This being said, the department alone cannot bear all of the responsibility for anti-doping investigations. More than ever, it is important to develop and verify the federations' and NADOs' competencies and promote the creation of effective, complete structures. That means that Gunter Younger's proposed creation of a compliance unit is absolutely pertinent.

4. To ensure the structure's long-term existence, it is important that in the event of an absence or a departure, all team members can be replaced with no major difficulties.

That implies the sharing of knowledge, not only that of the investigators and analysts (already solidly in place – among other ways, by means of daily meetings), but also that of administrative personnel. Due to a lack of resources, the departure of the coordinator generated some challenges in the structure. It is hard to follow up the duties for which she was exclusively responsible.

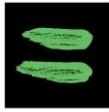
That also implies that the organization anticipate eventual departures for contractual, family or personal reasons.

The department members' work is extremely wearing, both psychologically and physically. Currently, all of the team members show unbridled devotion and are passionate about what they do.

As everyone knows, however, "results" obtained through judicial and other channels can be frustrating. The team members are therefore not immune to a form of burnout.

The professional status of certain team members and the ties they maintain with the bodies to which they belong also make long-term personnel stability relatively precarious.

The personality of the director is central. The director is the structure's linchpin and thought has to be given to how to replace him in the event of his unavailability.



5. Given the available means, there is still a risk, as pointed out last year, that the department (and through it, WADA) could be criticized for choosing and executing on its objectives arbitrarily.

The department was caught up last year by a small number of significant issues, especially the LIMS matter, which meant that everything else was given secondary importance.

This being said, it would obviously be wrong to measure the department's work by the number of cases processed.

This is however a risk, and the only way the department can protect itself is to commit itself today to do more, by equipping itself with the appropriate means.

6. As pointed out above, the director's expectations in terms of logistics, namely the need to create a separate, enclosed workstation for the CIM, have to be taken into account. The CIM and the people around him share this opinion and are personally disturbed by the lack of privacy.

Once a CIM has been hired for the Lausanne branch, the same precautions have to be applied.

7. Another reminder: The team members have to remain at the leading edge of anti-doping knowledge.

Maintaining this knowledge requires ongoing high-level training.

8. The audit was conducted in an extremely positive atmosphere. The supervisor was given access to all of the documents and information he felt he needed in order to complete his mission.

For obvious reasons, this report is anonymized. Only the director is named.

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Montreal and Lutry, August 2019