WADA’s Compliance Monitoring Program

WADA Webinar
Montreal, Canada
30 January 2017
Agenda

- Overview of WADA’s new compliance activities in 2017
- WADA’s Compliance Monitoring Program
- Code Compliance Questionnaire
- Next Steps
- Questions & Answers
Further Protection of the Clean Athletes

- Athletes expect and deserve credible programs
- First full compliance review of 2015 World Anti-Doping Code
- Collaborative commitment to enhance programs
General Principles of a “Partnership to Compliance”

- Over 320 Signatories monitored
- Self assessment via questionnaire
- Corrective actions (if required)
- Supported by in-person audit program
- Regular dialogue and guidance
- ISO9001:2015 certification
- Emphasis on improving programs not non-compliance
COMPLIANCE MONITORING PROGRAM
The Different Steps of the Compliance Process

I. Code Acceptance

II. Implementation of the Code in the internal legal system

III. Implementation of a compliant Anti-Doping program
How is WADA organized for Compliance?

Internal Compliance Task Force

- Legal
- Standards and Harmonization
- NADO/RADO Relations
- IF Relations
- Investigations
- Education
- Medical
- Science
- African, Asian and Latin American Regional Offices

Compliance Unit

Compliance Review Committee

Signatories

WADA Foundation Board

WADA Executive Committee
WADA’s internal Compliance Taskforce

- Created to coordinate WADA’s compliance activities
- Meet bi-weekly
- New compliance issues discussed and action taken
- Compliance Unit coordinates communication with the Compliance Review Committee and Signatories
The Compliance Review Committee

- First meeting February 2015
- Recently established as a Standing Committee of WADA
- Provides independent, expert advice
- Members include experts in compliance from other industries (pharmaceutical, aviation)
- Makes recommendations to the WADA Foundation Board on compliance matters
Declaring a signatory non-compliant is a long process

WADA engages Signatory

Taskforce reviews (3 months with possible 3 month extension)

CRC reviews/recommends (possible 4 months extension)

Foundation Board declares Signatory non-compliant or automatic post 4 months

Consequences imposed by WADA (and implemented by other organizations)

Corrective action taken by Signatory

Taskforce review, CRC recommend; and, Foundation Board reinstates

Declaration appealable to CAS

Corrective action taken by Signatory
Consequences in case of non-compliance
CODE
COMPLIANCE
QUESTIONNAIRE
Compliance Questionnaire

- One of the tools to assist Signatories comply with Code Article 23.5.2
- Designed to measure compliance with mandatory provisions and the quality of implementation
- ‘Pilot Group’ of 20 Anti-Doping Organizations assisted in the development and testing
- Draft Questionnaire circulated in July 2016 to allow Signatories time to prepare
Compliance Questionnaire

- Online tool which will be sent to each Signatory’s ‘Compliance Contact’ in **February 2017**
- System available in English and French, user guide also available
- Over **300** questions in total, however questions are specific to each Signatories activity
- Measure of activities for **2016** (Jan to Dec), sometimes referred to as the ‘reporting period’
- Signatories will have **3 months** to complete and submit the questionnaire
Key Areas of the Compliance Questionnaire

- 7 Sections:
  1. ADAMS, Budgeting & Reporting
  2. Testing and Investigations
  3. Results Management
  4. Therapeutic Use Exemptions
  5. Education
  6. Data Privacy
  7. Other ADO Information
ADAMS, Budget and Reporting

- 11 Questions
- Signatories’ overall budget
- Budget breakdown of various Anti-Doping programs
- Signatories’ use of ADAMS – DCFs / TUEs
- Annual reporting of statistics
Testing and Investigations

- 101 Questions
- Risk Assessment and TDP
- TDSSA – Minimum Levels of Analysis
- RTPs and Whereabouts Pools
- Out-of-Competition testing
- ABP
Testing and Investigations

- Sample collection personnel – training, monitoring and re-accreditation (if relevant)
- Sample collection procedures
- Intelligence - methods to gather, store and use
Results Management

- 76 Questions
- Confidentiality of Result Management Process
- Initial Review of Adverse Analytical Findings
- Provisional Suspensions
- Whereabouts Failures
- Judicial Panel
- Notification / Publication
Therapeutic Use Exemptions (TUEs)

- 19 Questions
- TUE Application Process
- Therapeutic Use Exemption Committee
- Review Process and Decision
- Reporting of Decision
Education

- 11 Questions
- Provision of Education to Athletes & Athlete Support Personnel
- Education Plan
- Type of Education Delivered
- Information Available on Website
Data Privacy

- 8 questions
- Athlete consent
- Athlete information on processing and storage of information
- Sharing of data with other organizations
Other ADO Information

- 15 questions
- Strategic and Operational Plans
- Governance of organization
- Staffing roles and responsibilities
- Legislation
Different type of Questions

- Some questions specific to NADOs and IFs
- ‘YES’ and ‘NO’ with please explain
- Single and Multiple choice options
- Upload of documents (e.g. TDP)
- Numerical data
Invitation to Register

Sent to Compliance Contact

Registration

Access to User Guide

Deadline to complete and submit

Reminders will be sent

Initial Registration Notification

Dear Sir/Madam,

As the Compliance Contact for your organization you are receiving this invitation to register and complete the WADA Compliance Questionnaire. Please follow the link below to register.

Registration form

From today (12/01/2017) you have 3 months to complete and submit the Compliance Questionnaire. The deadline to submit your Questionnaire is 12/04/2017.

Before you start the Questionnaire please read the user guide. If you have any questions or require further assistance please email compliance.test@wada-ama.org.

WADA
Log In

- Username and password created during registration process
- Forgot password functionality
- Compatible with tablet and smartphone
- Accessible anywhere with internet connectivity
Introduction

The Compliance Questionnaire (“Questionnaire”) is a tool developed by WADA to measure compliance of signatories to the mandatory requirements of the World Anti-Doping Code (Code) and International Standards. The Questionnaire has been developed into an online system to assist signatories in providing responses and data to a series of questions. The questions have been categorized into 7 sections, namely, 1. ADAMS, Budgeting and Reporting; 2. Testing and Investigations; 3. Results Management; 4. Therapeutic Use Exemptions (TUE); 5. Education; 6. Data Privacy and 7. Anti-Doping Organization (ADO) Information.

Compliance Questionnaire User Guide

Legal statement

This questionnaire is about the practices of your Anti-Doping Organization (ADO). WADA is not seeking detailed information on any specific individual athlete or case. To the extent you provide personal data to us, such as your contact details, we will use this data only for the purpose of analyzing questionnaire responses and contacting you and your ADO to communicate about this questionnaire and your responses to it.
Features

- Compliance Contact can create multiple users across their organization
- Lock function
Questionnaire mode: Edit On [Locked by Kevin Haynes]

2.1 Risk Assessment and Test Distribution Planning (TDP)

1. Have you conducted a full risk assessment as outlined in Article 4.2. of the International Standard for Testing & Investigations (ISTI) for the sports/disciplines within your jurisdiction? [ISTI 4.2.1]

1.1 Please submit your risk assessment procedure and outcomes. Please use the following template: risk_assessment_template.xlsx

2. Have you developed your Test Distribution Plan (TDP) based on your risk assessment? [ISTI 4.3]

2. Please a copy of your initial testing plan and a final report of your completed tests for the reporting period. Including:

2.1 In Competition/Out-Of-Competition tests (numbers and percentages (%)),
Features

- Compliance Contact can create multiple users across their organization
- Lock function
- References to Code and International Standards articles
2.1 Risk Assessment and Test Distribution Planning (TDP)

1. Have you conducted a full risk assessment as outlined in Article 4.2. of the International Standard for Testing & Investigations (ISTI) for the sports/disciplines within your jurisdiction? ISTI 4.2.1

   - Yes
   - No

1.1 Please submit your risk assessment procedure and outcomes. Please use the following template: risk_assessment_template.xlsx

   ![Attach]

2. Have you developed your Test Distribution Plan (TDP) based on your risk assessment? ISTI 4.1.3

   - Yes
   - No

3. Please provide a copy of your initial testing plan and a final report of your completed tests for the reporting period. Including:
   a. In Competition/Out-Of-Competition tests (numbers and percentages (%)),
ISTI 4.1.3

The Anti-Doping Organization shall document its Test Distribution Plan and shall file that Test Distribution Plan with WADA (a) when seeking WADA’s approval pursuant to Code Article 6.4.2 to analyse Samples using a less extensive menu than that set out in the Technical Document referenced at Code Article 5.1.1, in accordance with Article 4.7.1 of this International Standard and (b) where requested by WADA, as part of the process of demonstrating the Anti-Doping Organization’s satisfaction of the requirements of Code Article 5.4.

2. Have you developed your Test Distribution Plan (TDP) based on your risk assessment? Yes No

3. Please provide a copy of your initial testing plan and a final report of your completed tests for the reporting period, including:
   a. In Competition/Out-Of-Competition tests (numbers and percentages (%)),
Features

- Compliance Contact can create multiple users across their organization
- Lock function
- References to Code and International Standards articles
- Links to guidance documents, definitions and template documents (Risk Assessment and TDP)

World Anti-Doping Code
Code Compliance Questionnaire (CCQ)
User Guide

Version 1
January 2017
1. Have you conducted a full risk assessment as outlined in Article 4.2. of the International Standard for Testing & Investigations (ISTI) for the sports/disciplines within your jurisdiction? [ISTI 4.2.1]

1.1 Please submit your risk assessment procedure and outcomes. Please use the following template: [risk_assessment_template.xlsx]

2. Have you developed your Test Distribution Plan (TDP) based on your risk assessment? [ISTI 4.1.3]

2.1 Please provide a copy of your initial testing plan and a final report of your completed tests for the reporting period. Including:

a. In Competition/Out-Of-Competition tests (numbers and percentages (%)),
Conducting a risk assessment is intended to increase the effectiveness of a testing program by understanding the actual doping risks in a given sport or sports and subsequently applying a customized testing strategy. A proper assessment of doping risks is essential to determine where resources should be targeted and what type of focused testing is most appropriate. A thorough, well-informed, and documented basis to inform a testing program that is in compliance with the World Anti-Doping Code and such an assessment and plan is in and of itself a requirement for Code compliance.

The template document herein is intended to provide an optional framework to capture and document accurate, objective information on the types of sports and disciplines (as applicable) with a higher level of specificity, and to assess the risk scores directly to the subsequent to the TDP by factoring the number of athletes in each risk category.

Please feel free to use this framework to enhance your current documentation and add or amend fields as you wish. You may also wish to add weighting to the risk data to reflect the accuracy and relative importance of each risk factor.

The use of this document is not mandatory but seeks to act as a starting point for those organizations yet to develop such an assessment and plan.

Prior to completing these templates, please review WADA’s Guidelines for Implementing an Effective Testing Program which provides further detail on the risk factors outlined herein, and background context of an effective Testing program.
Features

- Compliance Contact can create multiple users across their organization
- Lock function
- References to Code and International Standards articles
- Links to guidance documents, definitions and template documents (Risk Assessment and TDP)
- ‘Incomplete answers’ button
- Progress bar and summary page
2.3 Athlete Biological Passport (ABP) modules

17. Have you implemented a WADA Athlete Biological Passport (ABP) Hematological Module Program?  
   [ ] Yes  [ ] No

17.1 Please explain the reasons you have not implemented a WADA Athlete Biological Passport (ABP) Hematological Module Program. Please select all that apply:
   [ ] Our risk assessment suggests that we do not need to collect Athlete Biological Passport (ABP)
   [ ] The Technical Document for Sport Specific Analysis (TDSSA) suggests we do not need to collect Athlete Biological Passport (ABP)
   [ ] Other
Submitting a Questionnaire
What happens once a Questionnaire is submitted?

- WADA will conduct a review
- Corrective Action Report issued (if required) including:
  - Guidance on what to correct
  - Timeframes for implementing (linked to importance of program area 3, 6 or 9 months)
  - Requirement to return a Corrective Action Plan to WADA
NEXT STEPS
Preparing for the Compliance Monitoring Program

- Ensure you have confirmed your Compliance Contact with WADA
- Review Draft Questionnaire distributed in July 2016
- Document policies & procedures and key documents e.g. risk assessment and complete 2016 TDP.
- You are responsible for your program (even if you outsource parts)
- Refer to WADA Guidelines, templates & resources
Next steps

- Questionnaire issued mid-February 2017 with 3 months to complete
- Start addressing any shortfalls – don’t wait for WADA
- Workshop and Compliance booth at WADA Annual Symposium
- WADA to review completed Questionnaires and conduct audits on a priority basis
Summary

- The enhanced compliance monitoring program will be the most robust evaluation of anti-doping activity WADA has undertaken.

- WADA’s objective is to support Signatories in enhancing their programs and to further protect the clean athletes, not to declare a Signatory non-compliant.

- Any questions or support required, please contact: compliance@wada-ama.org

- We look forward to your continued collaboration and partnership.