

Audit Corrective Action Plan

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| Organization | ADSE - Anti-Doping Sweden |
| Date(s) of Audit | 01 Dec 2021 - 02 Dec 2021 |
| Audit CAR submitted on | Jan 07, 2022 16:12 GMT by WADA Auditor |
| Last updated on | Jan 07, 2022 16:09 GMT by Emiliano Simonelli |

- **Critical** program areas require implementation within **3 months** after receiving the Audit Corrective Action Report from WADA:
03 actions with **DEADLINE** 07 Apr 2022
- **High Priority** program areas require implementation within **6 months** after receiving the Audit Corrective Action Report from WADA:
04 actions with **DEADLINE** 07 Jul 2022

AUDIT DETAILS

Signatory: ADSE - Anti-Doping Sweden

Date(s) of Audit: 01 Dec 2021 - 02 Dec 2021

Signatory Staff present:

Dr. Åke Andrén-Sandberg, Board Chair
Ms. Christine Helle, CEO
Mr. Tommy Forsgren, Senior Advisor
Mr. Anders Rådström, Manager Intelligence & Investigations
Ms. Jessica Samuelsson, Manager Legal counsel & Results management
Ms. Jenny Schulze, Manager Testing and Science
Mr. Peter Ström, Logistics and Quality Manager
Ms. Linn Gustafsson, DCO Manager and Coordinator Testing
Mr. Peder Mathiasson, Manager Communication & Education
Ms. Emilia Gulberg, Coordinator Testing, Whereabouts and TUEs
Ms. Sofia Jakobsson, Coordinator Testing & Whereabouts
Mr. Patric Junerud, Investigator Intelligence & Investigations
Ms. Charlotta Lindblom, Communicator Communication & Education
Ms. Angelica Sekobon, Coordinator TUEs & Testing

Audit Team present:

[REDACTED]

[Redacted]

Audit Scope: Full Audit - all parts of a Signatory's Anti-Doping Program

Date presented to WADA's Compliance Task Force: 20 Dec 2021

Date of Corrective Action Report submitted to Signatory: 07 Jan 2022

INTRODUCTION

A full audit of Anti-Doping Sweden (ADSE) took place at its headquarters in Stockholm, Sweden on 1-2 December 2021. The purpose of the audit was for WADA to work in a collaborative manner with ADSE to assess its anti-doping program with the objective of providing assistance and guidance to ADSE where any enhancements to its program were necessary under the World Anti-Doping Code (Code).

Therefore, the objective of this Corrective Action Report (CAR) and Corrective Action Plan (CAP) is to provide ADSE with clear and helpful corrective actions to assist with the further development of its anti-doping program in a prioritized manner which is in line with the Code and the International Standards.

Background to the Audit

The audit was proposed by WADA's internal Compliance Taskforce and endorsed by the independent Compliance Review Committee (CRC) based on the monitoring process outlined in the International Standard for Code Compliance by Signatories (ISCCS), specifically Articles 8.2.1 and 8.2.2. WADA notified ADSE of the audit on 15 September 2021, and on 4 October 2021 WADA provided the audit plan to ADSE. To assist ADSE with the audit preparations, the Lead Auditor communicated with ADSE via email and on 8 November 2021 held a teleconference to discuss the objectives of the audit, confirm the audit plan, finalize logistical details and confirm the availability of all ADSE staff and documentation during the period of the audit visit.

A representative from the Council of Europe was present during the audit as an observer, upon agreement by ADSE.

Methodology

To prepare for this audit, the audit team used the various sources of data, including ADAMS and the legal database, as part of its review of ADSE's anti-doping program. Furthermore, WADA requested that ADSE provide a number of documents (i.e., Annex A of the Notification). ADSE provided all documents as requested and this was extremely helpful to the audit team.

From the in-person discussions and review of documents provided by ADSE during the audit, it was apparent that ADSE had prepared for the audit and was open in the discussions. Staff and documents were available to the audit team during the on-site visit and this was greatly appreciated.

General Observations and Acknowledgements

It is the view of the audit team that ADSE has accomplished a lot with limited time since its recent establishment, in large part due to the experience, expertise and dedication of the current management. While this audit report presents the findings raised by the audit team and the associated corrective actions, we also wanted to take this opportunity to highlight the strengths of ADSE as an organization and of its anti-doping program. In particular:

- The organization appears to function in a very efficient manner, due to the ADSE experienced staff and internal processes.

- In the area of Testing, the audit team noted the comprehensive planning process in place and the collaboration within the different departments to ensure proper implementation. Test planning is conducted, not only from an overall perspective but also goes down to the athlete level. The rationale for including athletes in ADSE's Registered Testing Pool (RTP) and Testing Pool (TP) is sound and the level of testing appropriate. ADSE has also implemented a robust Athlete Biological Passport (ABP) program where Athlete Passport Management Unit (APMU) recommendations are promptly reviewed and implemented. The audit team also noted the quality of the sample collection personnel program in place which has a strong emphasis on maintaining the quality of sample collection personnel via several processes in place from identifying non-conformities, to proactively

following up with relevant personnel, to developing specific and personalized remedial training when necessary.

- In the area of Intelligence and Investigations, the audit team noted the expertise and efficiency of the team in place with well documented policies, procedures and processes. The audit team also noted the collaborative approach in place which ensures that information remains confidential when it needs to be but that it is shared, on a need-to-know basis, to ensure proper follow-up and actioning. In addition, the use of Molly, the dog able to track/identify potential prohibited substances, has proven beneficial from that perspective but even more so, from a prevention and deterrence perspective where athletes and athlete support personnel are encouraged to start a dialogue about anti-doping.

- In the area of Results Management, the audit team noted the quality of the program in place and the expertise and experience of the staff involved in this area.

- In the area of Education, the audit team noted ADSE's comprehensive education program which appears to be highly effective and dynamic.

- In the area Therapeutic Use Exemptions (TUEs), the program is well managed which ensures that operations are as efficient as possible and that all required timelines are implemented.

- In the area of Data Protection and Privacy, the audit team noted that ADSE has sound processes in place for protecting the personal information and other sensitive data processed.

The audit team sincerely thanks Ms. Christine Helle and her colleagues for their cooperation and engagement throughout the audit. WADA looks forward to assisting ADSE with the implementation of the corrective actions listed in this report in accordance with the timeframes listed herein.

Limitations

It should be noted that WADA compliance audits are technical in nature, assessing the compliance of the Signatory with the World Anti-Doping Code and the International Standards and represent a snapshot in time, i.e., the compliance of the anti-doping program at the time of the audit. As such, WADA compliance audit reports include findings and corrective actions based on this precise snapshot in time and not on a longitudinal review of a Signatory's anti-doping program over time. It should also be noted that audits are only one element of the broader WADA compliance monitoring program.

A Code Compliance Center (CCC) User Guide is attached to assist ADSE in completing the CAP.

 **Reference Files** ccq_user_guide_v5_en.pdf

FINDINGS & CAs

Instructions for ADO

This is the Corrective Action Report (CAR) following the audit conducted on ADSE on 1 and 2 December 2021.

The preliminary findings were verbally presented to the ADSE senior management team at the closing meeting of the audit by the audit team. This CAR is provided to ADSE in good faith, as a written record of these findings, and includes the corrective actions required from ADSE in order to address the findings. Where possible, the audit team has included links to relevant documents and resources to assist ADSE in addressing the areas identified.

The CAR categorizes the findings as either 'Critical' or 'High Priority'.

Critical findings are of the highest importance in terms of their implementation and are mandatory, core requirements of the Code and International Standards. ADSE has 3 months from the date of this CAR being issued (deadline 7 April 2022) to implement the relevant corrective actions in these program areas, procedures or processes. High Priority findings represent the next level of priority and ADSE will have 6 months to implement these corrective actions (deadline 7 July 2022).

Also contained within the CAR is the recommendation to complete and return your proposed Corrective Action Plan (CAP) for each finding. The CAP will assist ADSE in setting its own internal priorities and resources in terms of how each of the corrective actions will be addressed. ADSE should briefly state for each finding what action will be taken, by when and who is the responsible person within ADSE. You can complete the CAP directly through the Code Compliance Center (CCC) system and we kindly request that ADSE does so no later than 7 February 2022. Please also upload all relevant documents into the CCC.

We encourage you to contact [redacted] if you need any assistance in developing your CAP. The audit team also remains at your disposal for any assistance needed through the preparation of the CAP and the implementation of the corrective actions.

We wish to remind ADSE that, in accordance with the ISCCS, failure to implement the corrective actions can lead to a declaration of non-compliance.

CRITICAL

2. Testing & Investigations

Last updated on Jan 06, 2022 22:01 GMT by WADA Auditor

■ C.2.1.1

Finding

While ADSE has conducted an appropriate and thorough Risk Assessment of sports and disciplines practiced in Sweden, it has not documented its assessment of the relevant para-sports/disciplines. This is contrary to International Standard for Testing and Investigations (ISTI) Article 4.2.1.

Corrective Action

As per ISTI Article 4.2.1, ADSE shall revise its Risk Assessment by including the relevant para-sports/disciplines and documenting its assessment of those sports/disciplines.

Once the Risk Assessment is updated, ADSE shall provide it to WADA for review (preferably in

Corrective Action Plan Uncompleted

While ADSE verbally outlined how the para-sports/disciplines included in their TDP were assessed, this assessment was not documented.

the CCC).

Given outcomes of Risk Assessments must inform the Test Distribution Plan (TDP), can ADSE please confirm whether any updates (and if so, what they are) have been made to their TDP (as it relates to para sports/disciplines) as a result of this revised Risk Assessment.

The audit team confirms that between the audit and the issuing of this Corrective Action Report (CAR), ADSE has submitted, on 22 December 2021, a revised Risk Assessment which now incorporates an assessment of the para-sports/disciplines (see document entitled "Att 1) Risk Assessment ADSE" which is attached as a Reference File). In this same document, ADSE has incorporated its 2022 TDP which also incorporates a plan for its relevant para-sports/disciplines. The audit team deems this corrective action satisfactory and completed. No further action is required by ADSE.

The audit team thanks ADSE for addressing this so promptly. This corrective action can be marked as 'Completed'.

 **Reference Files**

Att 1) Risk Assessment
ADSE.xlsx

3. Results Management

Last updated on Jan 05, 2022 16:39 GMT by WADA Auditor

■ C.3.12.1

Finding

ADSE does not always promptly notify decisions to WADA and other Anti-Doping Organizations with a right of appeal under Code Article 13.2.3, as required by International Standard for Results Management (ISRM) Article 9.2.

Specifically, this relates to the following cases:

[REDACTED]

Corrective Action

As per ISRM Article 9.2, ADSE shall ensure that decisions are promptly notified to WADA and other Anti-Doping Organizations with a right of appeal under Code Article 13.2.3.

The existing internal process shall be adjusted accordingly and a copy shall be provided to WADA for review (preferably in the CCC).

Corrective Action Plan

Uncompleted

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■ C.3.13.1

Finding

The panel (Doping Board - DoN) in charge of provisional hearings related to provisional suspensions is the same panel (with the same composition of members) that hears cases on the merits. As a result, the impartiality of the panel required by Code Article 8.1 is not guaranteed. Furthermore, this system is not in line with the definition of Operational Independence provided in the Code ("any Person involved in the investigation and pre-adjudication of the matter cannot be appointed as members and/or clerks (...) of hearing panels of that Anti-Doping Organization with responsibility for Results Management").

Corrective Action

As per Code Article 8.1 and in light of the Code definition of Operational Independence, ADSE shall ensure that provisional hearings related to provisional suspensions are conducted by a panel having a different composition than the panel hearing the case on the merits.

ADSE shall provide evidence to WADA (preferably in the CCC) to confirm this change in procedure.

Corrective Action Plan

Uncompleted

[Empty box for corrective action plan]

HIGH PRIORITY

2. Testing & Investigations

Last updated on Jan 06, 2022 22:15 GMT by WADA Auditor

■ **H.2.5.1**

Finding

While ADSE is collecting samples until the requirement for suitable specific gravity is met (unless exceptional circumstances exist), if the additional samples collected do not meet the requirements for suitable specific gravity, the samples are discarded (i.e., disposed of in the toilet by the athlete, under observation of the sample collection personnel, not sealed and not sent to the laboratory). This was discussed in relation to procedure F.3.3.3 (which was provided to the audit team ahead of the audit).

This procedure is contrary to ISTI Annex F.4.4, which requires that for any additional samples collected, the procedure for the collection of urine samples be repeated (Annex C), as well as ISTI Annex F.4.9, which requires that all samples collected be sent to the laboratory.

Corrective Action

As per ISTI Annex F.4.4, Annex C, and Annex F.4.9, ADSE shall update its procedures and practices to ensure that the requirements identified in the finding are addressed. Specifically, ADSE shall ensure that, as it relates to the procedure for urine samples that do not meet the requirements for suitable specific gravity for analysis, that any and all additional samples provided by athletes are sealed and sent to the laboratory.

ADSE shall provide a copy of its updated procedures (preferably in the CCC) for the audit team to review. ADSE shall also confirm that its sample collection personnel have been informed of the revised procedures by providing evidence of how they were informed (i.e., email, screen capture of update sent via ADSE's online system, ISO process confirmation, etc.).

The audit team confirms that between the audit and the issuing of this Corrective Action Report (CAR), ADSE has submitted, on 22 December 2021, a revised procedure (specifically F.3.3) which confirms that all samples provided by an athlete and collected by ADSE will be sent to the laboratory. Thank you.

However and given the audit team had noticed this non-conformity in particular in procedure F.3.3.3 ("Checking specific weight"), can ADSE please confirm that this procedure has also been

Corrective Action Plan Uncompleted

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updated. Please see the document entitled "F.3.3.3 – WADA Comments", point 3 in particular, which is attached as a Reference File. The comment provided to point 4 is provided as a further note/recommendation. Please review and provide an updated version of procedure F.3.3.3 (to be in line with F.3.3).

As outlined in the corrective action, please also confirm how ADSE's sample collection personnel have been informed of the revised procedure.

 **Reference Files**

F.3.3.3 - WADA Comments.docx

3. Results Management

Last updated on Jan 06, 2022 22:07 GMT by WADA Auditor

■ H.3.3.1

Finding

When ADSE decides to close a case after the initial review , it does not always give notice (with reasons) to WADA and the other Anti-Doping Organizations with a right of appeal under Code Article 13.2.3., as per International Standard for Results Management (ISRM) Article 5.4.

Corrective Action

As per ISRM Article 5.4, when ADSE decides to close a case after the initial review, it shall give notice (with reasons) to WADA and the other Anti-Doping Organizations with a right of appeal under Code Article 13.2.3. A relevant internal procedure shall be created by ADSE and shall be provided to WADA for review (preferably in the CCC).

The audit team confirms that between the audit and the issuing of this Corrective Action Report (CAR), ADSE has provided WADA with the relevant internal procedure. The audit team deems this corrective action satisfactory and completed. No further action is required by ADSE. The audit team thanks ADSE for addressing this so promptly. This corrective action can be marked as 'Completed'.

Corrective Action Plan

Uncompleted

■ H.3.12.1

Finding

ADSE does not always use reasonable efforts to obtain consent for public disclosure from athletes or other persons in cases where it is determined, after a hearing or appeal, that the athlete or other person did not commit an anti-doping rule violation, as required by Code Article 14.3.4.

Corrective Action

As per Code Article 14.3.4, ADSE shall always use reasonable efforts to obtain consent for public disclosure from athletes or other persons in cases where it is determined, after a hearing or appeal, that the athlete or other person did not commit an anti-doping rule violation.

ADSE shall incorporate this element in the relevant internal process and provide WADA with a copy of this revised process for review (preferably in the CCC).

Corrective Action Plan

Uncompleted

The audit team confirms that between the audit and the issuing of this Corrective Action Report (CAR), ADSE has provided WADA with the relevant internal procedure. The audit team deems this corrective action satisfactory and completed. No further action is required by ADSE. The audit team thanks ADSE for addressing this so promptly. This corrective action can be marked as 'Completed'.

Last updated on Jan 05, 2022 16:41 GMT by WADA Auditor

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| <p>H.3.12.2</p> | <p>Finding</p> <p>While ADSE publicly discloses the disposition of the anti-doping matter within 20 days, it does not publish all details required by Code Article 14.3.2 for the athletes belonging to the "competitive level athlete" tier (i.e., second tier, between "elite athletes" and "recreational level athletes").</p> | <p>Corrective Action</p> <p>As per Code Article 14.3.2, ADSE shall publicly disclose all required information in relation to athletes belonging to the "competitive level athlete" tier.</p> <p>ADSE shall update its website with the required and missing information and confirm to WADA (preferably in the CCC) once this is done.</p> | <p>Corrective Action Plan Uncompleted</p> <div style="border: 1px solid orange; height: 20px; width: 100%;"></div> |
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BEST PRACTICE RECOMMENDATIONS

In addition to the mandatory requirements identified in this report, the audit team identified a number of additional best practice recommendations that while not considered mandatory within the Code or the International Standards, are important supporting procedures and activities related to those mandatory requirements. These recommendations do not have a timeframe for implementation; however, it is strongly recommended that ADSE implement them alongside other findings in this report to further enhance the quality of its anti-doping program.

3. Results Management

Last updated on Jan 05, 2022 22:33 GMT by WADA Auditor

3.4.1 WADA Auditor - Recommendation

It is recommended that a reference to the possibility of providing substantial assistance is inserted on a regular basis in the disciplinary bodies' decisions. The audit team confirms that between the audit and the issuing of this CAR, ADSE has already taken action in this respect.

ADO - Improvement plan

Last updated on Jan 05, 2022 22:33 GMT by WADA Auditor

3.4.2 WADA Auditor - Recommendation

It is recommended that an internal process is created in relation to Atypical Findings. The audit team confirms that between the audit and the issuing of this CAR, ADSE has already taken action in this respect.

ADO - Improvement plan

Last updated on Dec 16, 2021 14:52 GMT by WADA Auditor

3.4.3  **WADA Auditor - Recommendation**

ADSE is reminded that, when the case will occur, it shall notify WADA and the relevant international federation when ADSE concludes, based on the results of an investigation, that proceedings should not be brought forward against an athlete or other person asserting commission of an anti-doping rule violation, as per ISTI Article 12.3.3.

 **ADO - Improvement plan**

Last updated on Dec 16, 2021 14:58 GMT by WADA Auditor

3.14.1  **WADA Auditor - Recommendation**

Currently, the members of ADSE's Board have an active role in results management as they are asked to make a determination on how to prosecute cases that are particularly complicated or that differ from existing precedents.

There is no evidence that the ADSE members are involved in the management or operations of any international federation (IF), national federation (NF), Major Event Organization (MEO), National Olympic Committee (NOC), National Paralympic Committee (NPC), or government department with responsibility for sport or anti-doping. Still, and to fully ensure the differentiation between the oversight role of the Board and the operational role of ADSE, it is recommended that ADSE consider changing its practice to ensure that the final decision on how to prosecute cases is always made by ADSE staff (if needed, after a consultation with other relevant persons).

 **ADO - Improvement plan**

5. Education

Last updated on Dec 16, 2021 14:58 GMT by WADA Auditor

5.1

WADA Auditor - Recommendation

To further build on its existing education plan, the audit team recommends that ADSE considers the following:

- describing in more detail the system for the monitoring of the education plan and the evaluation of their education program;
- including all anti-doping education topics which are delivered as part of their education program in the education plan, as now they are provided only in the Annex I and;
- attaching to the education plan an updated list of existing anti-doping education resources.

ADO - Improvement plan

6. Data Privacy

Last updated on Dec 14, 2021 16:01 GMT by WADA Auditor

6.1

WADA Auditor - Recommendation

The audit team recommends that ADSE always ensures that the relevant data protection provisions are included in future agreements to be signed with other NADOs.

ADO - Improvement plan