

Project Report

UK Anti-Doping and the
Russian Anti-Doping Agency
during Non-Compliance





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Executive Summary

This paper sets out a comprehensive debrief of UK Anti-Doping's (UKAD) work conducted, in collaboration with the World Anti-Doping Agency (WADA), in Russia during the Russian Anti-Doping Agency's (RUSADA) period of non-compliance.

Following the announcement of RUSADA's non-compliance by WADA in November 2015, UKAD was approached by WADA to assist with anti-doping operations in Russia during the period of non-compliance. In January 2016, UKAD signed a tripartite agreement with WADA and RUSADA stipulating that UKAD would take over the following operations in Russia:

- Delivery of a testing programme for Russian athletes
- Management of Therapeutic Use Exemptions (TUEs)
- Training of Doping Control Officers (DCOs)

At the outset, this project was anticipated to have a duration of six-to-nine months. Following UKAD's disengagement in September 2018, the project had lasted two years and eight months. Furthermore, UKAD's role within the project evolved over time, from one of delivery of the programmes above, to a mentoring and oversight role whilst RUSADA regained control of the planning and delivery of its testing programme.

The decision to engage in such a project was not taken lightly and required a vote by UKAD Board members at an Extraordinary Board meeting.



**Returning
Russian
Anti-
Doping to
compliance**

Agreement to engage in the project was subject to UKAD ensuring that effective risk management was in place as well as ensuring that there was no impact on UKAD's day-to-day operations, and no financial impact to the UK taxpayer.

A significant number of challenges were encountered throughout the duration of the project. From the existence of 'closed cities' (cities where access is controlled or restricted for reasons of military or other government activity) in Russia and poor-quality whereabouts (and therefore limited access to athletes to test), to decisions made by key partners such as the International Olympic Committee (IOC), International Paralympic Committee (IPC) and International Federations (e.g. the decision not to suspend Russian athletes by the IOC, and International Federations implementing eligibility criteria on Russian athletes wishing to compete internationally) – all of which had the potential to impact UKAD's effective delivery. Possibly the most significant challenges faced centred around the limited availability of DCOs, and difficulty of delivering a testing programme in a country the size of Russia, from a remote location (the UK), with limited knowledge of Russian athletes and the sporting landscape.

A key aim of the project was to deliver an intelligence-led, risk-based testing programme on Russian athletes, including the delivery of a pre-Games testing programme in the build-up to the Rio 2016 Olympic and Paralympic Games. Furthermore, integral to the delivery of the programme was ensuring that testing planned and delivered by UKAD was done so with no advance notice to RUSADA, Russian sport federations or Russian athletes. To do so took an extraordinary level of planning – a challenge in itself, given the time pressures to deliver a testing programme with immediate effect. Effective planning of

resourcing for the project, for testing logistics (e.g. engagement with Sample Collection Agencies (SCAs) and laboratories), for agreeing information and intelligence sharing processes with RUSADA staff, and for establishing key elements of the testing programme (e.g. development of an Athlete Passport Management Unit) were all key to the successful delivery of the project.

Overall it should be considered that the project was a significant success from UKAD's perspective. Over a 17-month period, UKAD conducted 4790 tests on Russian athletes, processed 265 intelligence reports, and tested 97% of the final Russia team attending the Rio 2016 Olympic Games. The testing programme led to 79 Adverse Analytical Findings (AAFs), 21 non-analytical findings and 240 Whereabouts Failures. Once RUSADA had regained responsibility for the planning and delivery of their testing programme, UKAD oversaw the delivery of close to 10,000 further tests. Throughout the duration of the project, UKAD received and processed 86 RUSADA TUEs, and delivered or supported four DCO training sessions.

The scale and importance of this project was one never encountered before by UKAD. At an organisational level, the project validated UKAD's strategic objective to influence anti-doping on a global scale. It enabled UKAD to 'fill the gap' of effective intelligence-led risk-based testing on Russian athletes during the period of non-compliance and in the absence of an anti-doping function in the country. It enabled UKAD to influence and assist in the rebuilding of RUSADA's expertise and capacity and has enhanced an already highly respected international reputation as a world-leading National Anti-Doping Organisation (NADO). At a staff level, it presented a significant professional development opportunity for staff to be involved in one of

the most (if not the most) important global anti-doping projects ever experienced.

Several lessons were learnt throughout the planning and delivery of this project, which is to be expected given the its unprecedented nature of the project.

Effective resourcing and risk management are of key importance. However, it is also important to understand that non-compliance of an Anti-Doping Organisation (ADO) is a global issue. It affects partners and stakeholders internationally, and realistic expectations must be set when delivering such a programme involving international logistics. Delivering a replica of one national programme in another country would not be suitable – the programme and its delivery must be able to adapt to the challenges and cultural and sporting differences that inevitably exist. UKAD hopes that this debrief will provide guidance and support for any similar future project.

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Purpose

Whilst serving as a comprehensive debrief of the project UKAD undertook, this document will also act as a point of reference to other NADOs who may be tasked with supporting a non-compliant NADO in the future.

UKAD's engagement in this type of project was unprecedented. However, WADA's Code compliance monitoring process has now been strengthened through the implementation of the International Standard for Code Compliance by Signatories (ISCCS). Within this International Standard, clear consequences for non-compliance have been stipulated, including, 'Supervision and/or Takeover of some or all of the Signatory's Anti-Doping Activities by an Approved Third Party, until WADA considers that the Signatory is in a position to implement such Anti-Doping Activities itself in a compliant manner without such measures.' (ISCCS, 11.1.1.4).

Such engagement could therefore be more commonplace moving forward, and UKAD hopes this document will encourage and support other well-developed NADOs to engage in what is a hugely important activity in the world of anti-doping.

Background

In December 2014, WADA commissioned an Independent Report into Russian Athletics following a documentary by German Broadcaster, Arbeitsgemeinschaft der öffentlich-rechtlichen Rundfunkanstalten der Bundesrepublik Deutschland (ARD). The documentary featured Vitaly and Yuliya Stepanov, alleging systematic doping in Russian athletics. The 'Pound Report', relating specifically to Russian athletics, was published in November 2015 and at this point, RUSADA was declared non-compliant by WADA and effectively ceased operational capacity.

WADA understood the need to maintain anti-doping operations in Russia during the period of RUSADA's non-compliance and after an initial assessment visit with UKAD to Moscow, requested that UKAD take over three areas of anti-doping operations, as referenced in the Executive Summary (1. Delivery of a testing programme on Russian athletes, 2. Management of Therapeutic Use Exemptions (TUEs), 3. Training of Doping Control Officers (DCOs)) in Russia during the period of non-compliance. This period of non-compliance was anticipated to last for six-to-nine months.

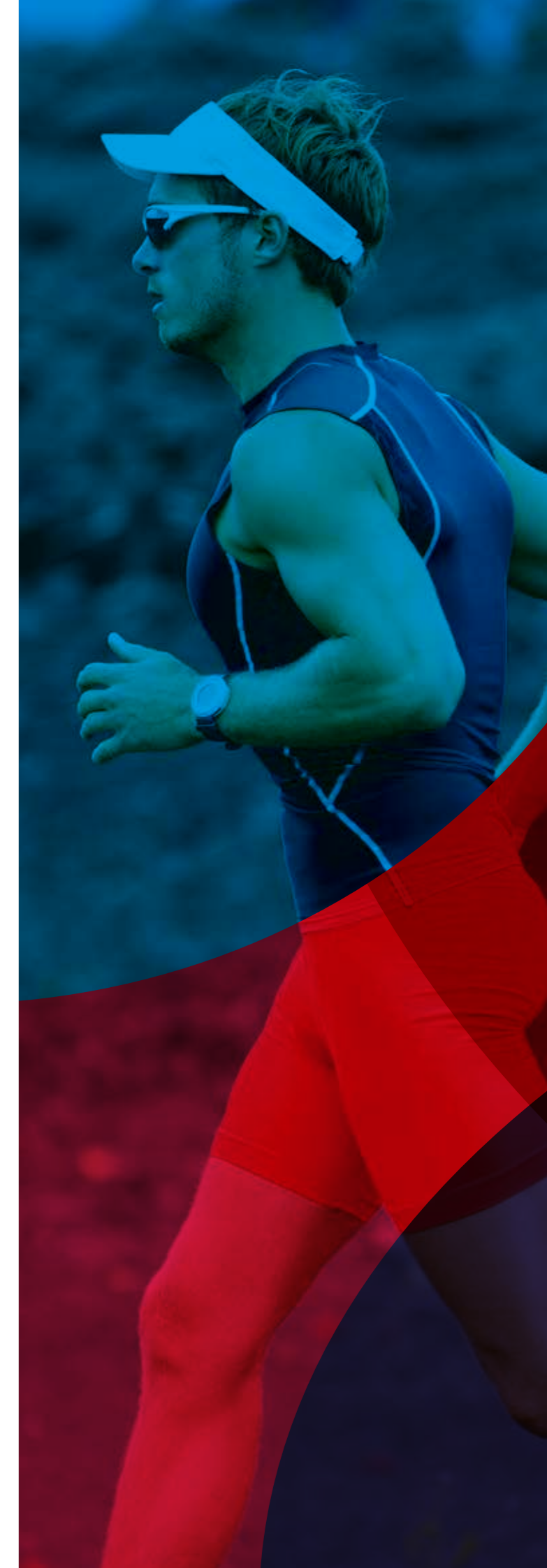
Alongside a thorough risk assessment, and identification of key milestones, this was the basis of the programme that was presented to the UKAD Board at a specially convened meeting in December 2015 and on which UKAD's involvement was discussed and subsequently approved. This approval was based on ensuring the risks to UKAD's financial state, cyber security and, importantly, operational capacity were mitigated. It was a priority that the project should not impact on the day-to-day operations of UKAD and that there should be no cost to the UK taxpayer. However, the gap that existed, with no testing or education programme running in Russia, and the risk posed to clean sport and

clean British athletes taking part in competitions, particularly with the 2016 Rio Olympic and Paralympic Games fast approaching, meant the opportunity to act was deemed to be the right course of action. The UKAD Board understood that stepping in to this role posed risks to UKAD, but also a key opportunity to protect British athletes, influence international decision making, and highlight UKAD's excellent capability.

At each point in the programme where there was any significant change to circumstances, such as the extension of UKAD's involvement, financial implications, RUSADA beginning to conduct testing again, and eventually RUSADA's re-instatement, UKAD's involvement, and the issues faced, were presented to and considered by the Board. This ensured that UKAD continued to act in a way which was mitigated by the risk assessment.

During the period of UKAD's engagement with RUSADA, further allegations of state-sponsored doping within Russian sport (including at Sochi 2014) were made via the Icarus documentary film, by Dr Grigory Rodchenkov (former Director of the WADA-accredited laboratory in Moscow). Following these allegations, a further Independent Report was commissioned by WADA in May 2016 (the 'McLaren Report') with the report being issued in two parts – July 2016 and December 2016.

As part of WADA's monitoring of RUSADA's compliance, a Roadmap to Compliance for RUSADA was created with a list of 31 mandatory criteria to be completed for RUSADA to become compliant again. The 'Roadmap' was implemented during the period of UKAD's engagement with RUSADA.



Devising the Plan

Scoping meeting – December 2015

In November 2015, UKAD was approached by WADA to attend an assessment visit of RUSADA and its operations, with the view of UKAD assisting WADA during RUSADA's period of non-compliance. In December 2015, this initial assessment visit to Russia was conducted by WADA, with UKAD's Director of Operations and a UKAD Testing Officer in attendance. It was following this visit that WADA formally approached UKAD to request it took over the relevant anti-doping operations identified above. UKAD/WADA determined that to protect the integrity of the project and testing programme, all testing had to be driven and determined by UKAD and with no advance notice to RUSADA or any Russian National Federations. It was also determined that for the project to be successful, collaboration, and particularly information gathering, with RUSADA was essential. This visit served as hugely beneficial to UKAD, enabling it to gather information on RUSADA, its operations, how the testing programme was run, and to meet those members of staff with whom it would be liaising.

UKAD requested additional information from RUSADA to better understand their operations to deliver the new testing programme. This information included:

- Details of the Registered Testing Pool (RTP) of athletes, and related Whereabouts Failures
- Test Distribution Plan (TDP), the overarching plan of a testing programme, and related information sources used to influence testing plans
- Intelligence held on Russian athletes
- List of Russian athletes currently sanctioned or with open cases

Staffing

A key element to devising the plan, was the determination of personnel required for its delivery. The following roles were assigned to this project:

- **Project Testing Officer** - a new full-time role was created with the most senior member of existing UKAD Testing Officers appointed. This role was responsible for project managing and successfully delivering UKAD's testing programme and training of DCOs, as their core focus
- **Project Administrator** – a new full-time fixed-term role was created and externally recruited to assist the Project Testing Officer in programme delivery. A Project Administrator with Russian language skills was appointed
- **Intelligence Analyst** – a part-time role on the project was appointed from existing UKAD Intelligence Analysts. This staff member was to receive and collate intelligence from all relevant sources (including RUSADA, Doping Control Paperwork, laboratory analysis, WADA and International Federations), analyse and disseminate to Project Testing Officer for use in the planning of the testing programme
- **Medical Programmes Officer** – a part-time role on the project, responsible for processing of RUSADA TUEs. The project work was conducted outside of core working hours
- **Head of Testing** – day-to-day oversight and support role to the Project Testing Officer
- **Director of Operations** – project sponsor, accountable to UKAD Board, and support role to all project members
- **Additional Testing Officer** – an additional part-time Testing Officer resource was appointed to the project for the summer of 2016 due to capacity challenges in UKAD's other testing programmes

- **DCO Trainers** – responsible for delivering DCO training to prospective RUSADA DCOs. No additional trainers were recruited as existing resource sufficed
- **TUE Committee (TUEC) Members** – responsible for reviewing TUEs for Russian athletes in accordance with the International Standard for TUEs (IS-TUE). No additional TUEC members were recruited

As the role of Project Testing Officer was full-time and appointed internally, the UKAD role they fulfilled (Athlete Biological Passport (ABP) Testing Officer) was back-filled on a fixed-term basis. It was important to ensure that whilst this project was given the resource and staffing required to deliver effectively, that it did not impact the running of UKAD's own national testing programme. All other roles involved in the project, excluding the Project Administrator role which was externally recruited, were part-time and fulfilled as additional responsibilities within their existing roles.

Developing the Plan

In the weeks following the scoping visit, a significant amount of work was conducted on devising the operational plan. At the start of the project, the request was for UKAD to be involved for six-to-nine months, with the delivery of a pre-Games testing programme in advance of the Rio 2016 Olympic and Paralympic Games a priority. Knowing that significant challenges would be faced, at no stage did UKAD commit, or WADA set expectations of, specific test numbers during this initial period of the project. The principle was to do as many tests as was feasible whilst maintaining the integrity of the programme.

The following activities/actions highlight some of the areas of focus for the plan:

- Information gathering - as indicated above, this was integral to developing a plan of action for UKAD. Effective test planning can only take place when comprehensive information is obtained and analysed. This factor is heightened when considering the delivery of the programme was remote. It was key for UKAD to obtain as much information as possible in relation to Russian sport and athletes in the planning phase
- Developing processes and procedures – this included how information and intelligence would be shared between UKAD and RUSADA without compromising the integrity of the programme, obtaining access to the Anti-Doping Administration and Management System (ADAMS) etc
- Sample collection – in the absence of RUSADA DCOs, determining how samples would be collected under the direction of UKAD was a priority (see 'Sample Collection Agencies (SCAs)' below)
- Sample analysis – with no WADA-accredited laboratory in Russia, work was required to identify where samples would be analysed for the purposes of the programme, and how samples would be transported to these laboratories

It should be noted that there were significant time pressures during this planning phase. At this stage (December 2015), no testing was taking place in Russia, and there was an understandable desire from WADA for testing to resume as quickly as possible. Furthermore, certain areas of the operational planning took longer than others, for example ensuring the appropriate SCAs were prepared for the work,. This meant that UKAD was managing internal staff changes and transitions

for the project, alongside developing the plan and delivering it simultaneously. This was a significant challenge for the project.

Once the plan was developed and key processes and procedures identified, a further meeting was held at RUSADA's offices in February 2016 (see 'Visits to Russia' below). UKAD presented its proposed approach to RUSADA and WADA staff involved in the project and agreement was reached.

Sample Collection Agencies (SCAs)

As mentioned above, extensive detail was required in the planning for the testing programme. As there were no existing RUSADA DCOs in Russia following the termination of all RUSADA DCO positions, and given that Russia is a country with significant logistical challenges around travel and access restrictions, private SCAs had to be sourced. Two companies with which UKAD has existing working relationships had capacity to conduct testing in Russia. The Swedish company IDTM and Germany based PWC were appointed. These private SCAs were responsible for delivering the following:

- Sample collection, in accordance with the International Standard for Testing and Investigations (ISTI)
- Secure transportation of samples to a WADA-accredited laboratory
- Delivery of all doping control documentation to both UKAD and RUSADA

As will be detailed later in the debrief, limitations around SCA capacity and DCO resource was one of the key challenges in the initial stages of the project (see 'Challenges in delivery and outcomes'). This had a significant impact on UKAD's ability to deliver the project to the scale it desired in the first 12 months. This challenge was

heightened by what was effectively 'competition' between UKAD's delivery of RUSADA's testing programme, and the comprehensive testing programmes International Federations were imposing on Russian athletes in the build-up to major events (e.g. the Rio 2016 Olympic Games). This is further detailed below in 'Rio 2016 pre-Games testing programme.'

WADA-Accredited Laboratories

With the suspension of the Moscow laboratory, alternative WADA-accredited laboratories needed to be sought. In the initial stages of delivering the testing programme, alternative WADA-accredited laboratories were used with which RUSADA had agreements in place. This restricted the options to two potential laboratories – Lausanne, Switzerland, and Almaty, Kazakhstan. Given the limitations and challenges this posed (e.g. limited laboratory capacity and high laboratory costs) RUSADA was requested to establish contracts with several other WADA-accredited laboratories. These were primarily determined by the relationship between the SCA and the laboratory and took into consideration logistics such as the ease of exporting of samples (which seemed to be easier to certain countries) as well as the need for all samples to be shipped through Moscow irrespective of where the sample was collected.

During this period, UKAD facilitated conversations between RUSADA and multiple laboratories, and ultimately additional contracts between RUSADA and five laboratories were agreed. This provided preferential rates for sample analysis for RUSADA and provided greater options for long-term storage of samples. These laboratories were Barcelona, Cologne, Seibersdorf, Stockholm and Warsaw.

Contract Negotiations

Upon UKAD Board's approval of UKAD's involvement in the project, work began on contractual negotiations for a tripartite agreement between WADA, RUSADA and UKAD. This process took over one month despite the urgency of the project and was signed in late January 2016. This process was somewhat delayed due to the Christmas period, language challenges and slow responses from RUSADA.

Upon signing the contract, further delays in UKAD's visit to Moscow (February 2016) and commencement of the project were experienced due to a delay in the payment of the security deposit from RUSADA. The implementation of a security deposit was important for UKAD, given the financial and reputational risk associated with the project. Its implementation was non-negotiable and UKAD's stance was to not begin incurring costs until the security deposit was in place.

The contract clearly stipulated UKAD's responsibilities. It should be noted that RUSADA retained responsibility for the following activities:

- Education and athlete support
- Some intelligence and investigations functions
- Results Management (all cases were heard by the Court of Arbitration for Sport) with oversight from WADA

It should be further noted the significant challenges faced with contract implementation, amendments and termination as well as monthly invoicing – primarily due to the complex processes required within Russia. The termination of the agreement also involved a similarly bureaucratic process, and monthly invoicing required a 'schedule of services' to be completed in both Russian and English submitted alongside the invoices themselves.

These were challenges faced by others when engaging with RUSADA, e.g. SCAs, and often contributed to delays in formalising relationships and ultimately delivery of the project.

Evolution of the Plan

As previously stated, upon starting this project, UKAD's expectations were for involvement to last for six-to-nine months. However, with new allegations and investigations beginning during the project, timeframes and plans were adapted accordingly.

In April 2016, WADA appointed two International Experts to lead the reform of RUSADA. Following their appointment, greater clarity was obtained on anticipated timeframes for RUSADA to rebuild and obtain compliance, and it was during their initial six months that it was requested for UKAD to continue its involvement in the project until at least April 2018, and, ultimately, until RUSADA was re-instated as compliant.

Throughout the course of the project, requests for additional assistance were made of UKAD outside of the scope of the initial tripartite contract. At a meeting in July 2016 with the WADA International Experts (held in London), initial discussions were held regarding UKAD assisting in the development and delivery of RUSADA's education and information programme. Following an intervention by WADA, this was not progressed and became the responsibility of the WADA International Experts. In addition to this, TUE training for RUSADA's TUE Committee was requested by WADA but due to capacity limitations, UKAD was unable to fulfil this request.

WADA Engagement

In November 2016, at a meeting with WADA and the WADA International Experts, UKAD was made aware of WADA's Roadmap to Compliance for RUSADA. This again provided UKAD with further context and timeframes for the project and UKAD's involvement. Additionally, approximate timeframes (subject to the Roadmap to Compliance) were identified for the transition of testing programme responsibilities to RUSADA. However, it was determined that whilst day-to-day responsibilities would be handed over to RUSADA at an appropriate time, UKAD would retain oversight, and act as a 'mentor' until compliance was re-instated. This significantly altered the approach and delivery of the last 16 months of the project.

For 2017, UKAD was made aware of RUSADA's budget for the year, and therefore test numbers were delivered in accordance with RUSADA's budget. At no stage, however, did UKAD commit to delivering a set number of tests. Given the challenges of the project, this was simply not feasible.

Communication Strategy

From the start of the project UKAD had a clear communication strategy – not to publicly discuss the details of its involvement in the project. The reason for this was that WADA was the lead on the project, and all requests for information on the project were forwarded to WADA.

As this was a matter of Anti-Doping Organisation (ADO) non-compliance, WADA was ultimately responsible for the RUSADA project throughout. UKAD's role, and one which UKAD was clear to communicate to WADA from the onset and to all partners and stakeholders, was operational and subsequently a supporting role. UKAD played no role in the determination of RUSADA's progress against the Roadmap to Compliance or compliance more generally. Regular engagement with WADA was therefore essential for its oversight and management of the project overall. Representatives from WADA were present at most of the UKAD visits to Russia to support the delivery as well as to work with other areas of Russian government and RUSADA with which UKAD was not involved.

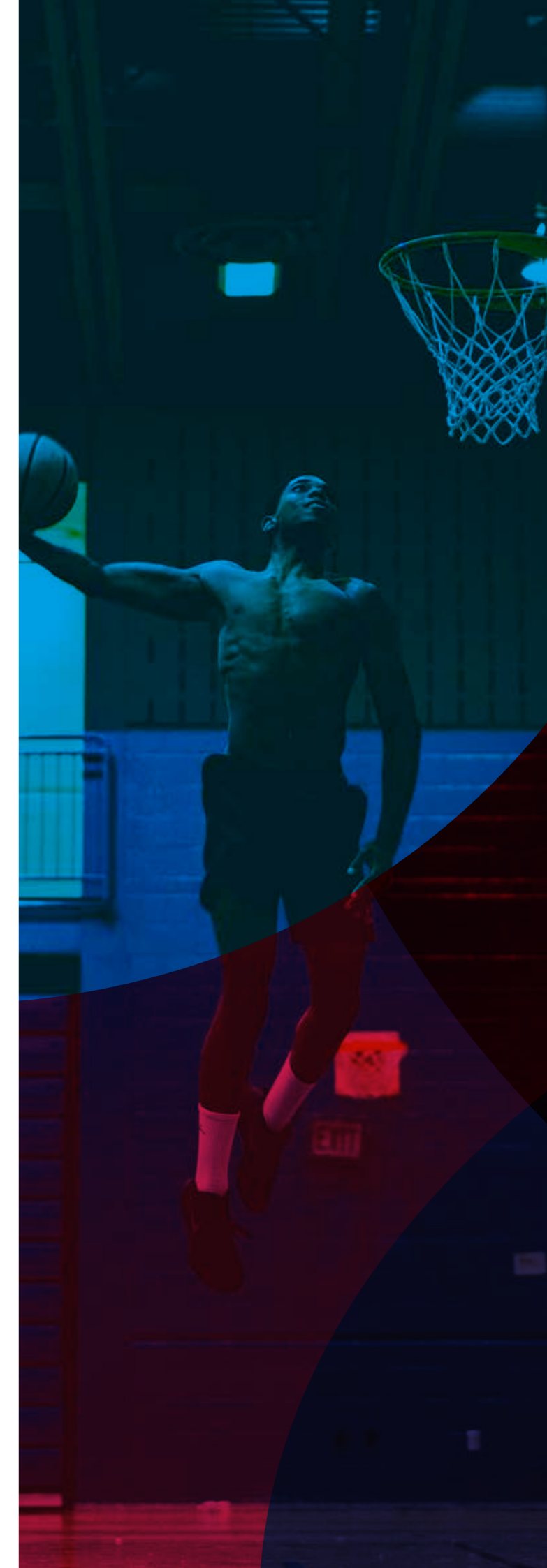
On two separate occasions, and outside of the meetings held in Russia identified below, meetings were held between UKAD, WADA and the WADA International Experts at the UKAD offices. Such meetings served to assess progress of the project, discuss future plans and timeframes for UKAD's involvement, and on one occasion enabled UKAD to input into WADA's Roadmap to Compliance for RUSADA/Russia. UKAD's input to the Roadmap to Compliance related primarily to UKAD's oversight and involvement in the project. These meetings were held in July 2016 and November 2016.

WADA engagement and support for UKAD was essential from UKAD's perspective. It should be noted that there was ongoing support from WADA for UKAD throughout the project in the decisions UKAD made and programmes implemented. UKAD was also able to inform WADA of any discrepancies or issues identified with current operating practices within RUSADA e.g. discrepancies recorded on ADAMS and the quarterly whereabouts submission process. Furthermore, WADA appropriately intervened on occasions, when required, to ensure that there was no perceived interference in the programme from RUSADA, as well as managing communications with other ADOs (e.g. International Federations) who had mutual interests in the situation in Russia.

UKAD provided fortnightly reports to WADA including a summary of the following:

- Testing statistics
- Results Management updates
- Intelligence received and processed
- TUE statistics
- DCO training updates
- Key challenges and planned actions/resolutions

This reporting was matched when RUSADA began delivering the testing programme and provided objective evidence for UKAD's feedback and mentoring.



Visits to Russia

In agreeing and completing the RUSADA programme, a number of members of UKAD staff made trips to Russia. These trips and meetings were essential to the successful delivery of the project.

Date	Location	Purpose	UKAD Attendees
Dec 2015	Moscow	Initial scoping meeting	Director of Operations, Testing Officer
Feb 2016	Moscow	Determine how project would operate, processes and procedures, information gathering	Project Testing Officer, Head of Testing, Intelligence Analyst
March 2016	Moscow	Review project processes and procedures, deliver DCO training to office staff and meet appointed International Experts	Project Testing Officer, Head of Testing, Intelligence Analyst, DCO Trainer (x2)
Feb 2017	London	Review project progress, meet and support new RUSADA Head of Testing and Head of Science	Project Testing Officer, Head of Testing, Director of Operations, Chief Executive
Mar 2017	Moscow	Deliver DCO training	Project Testing Officer, Deputy Head of Testing, DCO Trainer (x3)
May 2017	Moscow	Initiate handover of testing programme responsibilities to RUSADA Testing Team	Project Testing Officer, Head of Testing
June 2017	Moscow/ Sochi	Deliver 'Train the Trainer' DCO training, supervise delivery of DCO training	Project Testing Officer, DCO Trainer (x1)

UKAD conducted six visits to Russia

Delivery of the Plan

Delivery of the plan was the remit of the Project Testing Officer, supported by a Project Administrator as well as the Head of Testing, the Director of Operations, and the Intelligence Analyst. The operational delivery mirrored the same principles and, where possible, the same processes as the delivery of UKAD's testing programme. However due to the significant challenges faced - time constraints, running a testing programme for another country remotely, differences in sporting landscape - this was not always feasible.

Developing the Test Distribution Plan (TDP) and Test Planning

The testing programme delivered was risk-based and intelligence-led throughout. The Project Testing Officer developed a month-by-month sport specific risk assessment at the start of the project. Having collated relevant information, for example training camp information and competition schedules, the Project Testing Officer was able to utilise UKAD resources to determine risk windows for testing in different sports. Key periods of risk, for both In-Competition and Out-of-Competition, were identified across sports, and this formed the foundation of the TDP that was delivered. This risk assessment, whilst not as comprehensive as that conducted for UKAD's own testing programme, given time pressures (i.e. the need to start testing immediately), resources available across the project, and the lack of knowledge of the Russian sporting landscape, was the most effective methodology.

Information gathering and sharing by RUSADA's Testing Team was very important at this stage. The RUSADA Testing Team staff were tasked with researching, collating and sharing information of forthcoming competitions and training camps across sports on a monthly basis. UKAD conducted its own research as well, yet despite having a Project Administrator with Russian language skills, this proved challenging. Utilising information collated, the risk assessment, and intelligence received (see 'Intelligence' below) the Project Testing Officer was able to develop effective risk-based intelligence-led testing plans across all sports.

Consideration had to be given to the implementation of a re-instatement testing programme, given the high number of currently sanctioned Russian athletes and the need to test them prior to returning to competition.

WADA's Anti-Doping Administration and Management System (ADAMS) was used for the delivery of the testing programme and as this system is used by UKAD, no further specific training was required. It should again be stressed, that despite some information being collated and provided by RUSADA, all test plans implemented were done so at no advance notice to RUSADA and its staff, Russian National Federations and Russian athletes. All test plans were stored and managed through documentation on ADAMS. No RUSADA staff had the access to ADAMS to see these up-coming test plans on Russian athletes. RUSADA staff only became aware of test plans once in receipt of doping control documentation (e.g. Doping Control Forms) for completed tests. The integrity of the testing programme was maintained at all times.

Running an Anti-Doping programme in Russia

Registered Testing Pool (RTP) and 'Extended' Pool

A complete review of RUSADA's RTP was conducted at the start of the project, with ongoing reviews taking place on a quarterly basis. Reviewing another country's presents significant challenges. RUSADA Testing Team staff were asked to contribute recommendations to the RTP, however all final decisions remained with UKAD and the Project Testing Officer. A significant amount of open source research was conducted to ensure the RTP was as effective as possible, and with Rio 2016 pre-Games testing being a key focus of the programme, long and short-listed Russian athletes for the Games were utilised to further enhance the process for determining which athletes were included in the RTP.

In addition to the RTP, UKAD implemented an 'Extended' Pool – a pool of athletes below that of the RTP who were required to submit non-International Standard for Testing and Investigations whereabouts. Athletes were required to submit all whereabouts as required by an RTP athlete, except for the 60-minute timeslot each day. By implementing such a pool, UKAD had access to whereabouts across a greater pool of athletes, therefore enabling greater levels of Out-of-Competition testing to be conducted. As with the RTP, the process for determining athletes for inclusion in the 'Extended' Pool relied on recommendations from the RUSADA Testing Team, open source research by UKAD, and Rio 2016 long and short-listed Russian competitors.

Throughout the duration of the project, there were approximately 400-450 athletes in RUSADA's RTP and a further 150-200 in RUSADA's Extended Pool.

The process of communicating with RTP and 'Extended' Pool athletes regarding their inclusion was the responsibility of RUSADA (conducted via the National Federation), as was the process for monitoring and managing quarterly whereabouts submissions. The quality of whereabouts provided was often a challenge, and at the start of the project the process for managing whereabouts submission was not robust. Given this, UKAD worked with RUSADA to improve this process, and the Project Testing Officer and Intelligence Analyst were required to play a proactive role in generating quarterly whereabouts submissions reports from ADAMS - monitoring and reporting to WADA if there were any discrepancies in the process.

Rio 2016 Pre-Games Testing Programme

The initial project length estimate was six-to-nine months, and it was UKAD's expectation that running a Rio 2016 pre-Games testing programme would be a key focus of the project.

To deliver such a programme, the provision of long and short lists of selected athletes, from the Russian National Olympic Committee (NOC) and National Paralympic Committee (NPC) was required. Given that such lists were very long (over 2100 athletes), UKAD also conducted its own research, using a range of data sources and tools, (as it did when acting as Secretariat for the IOC's pre-Games Taskforce in the months leading up to the Rio 2016 Olympics). Whilst not completely accurate, it provided excellent guidance on which athletes were likely to perform, and perform well, at the Games.

When RUSADA was suspended by WADA, the scope of the 'Pound Report' was focussed only on Athletics. This led to the suspension of the Russian National Federation for athletics (ARAF) by the IAAF and subsequently the IAAF setting substantial minimum testing requirements for Russian athletes to be eligible to compete at International competitions, including the Olympic Games. Following the release of the first part of the 'McLaren Report' in July 2016, the IOC's decision not to ban the Russian NOC, and delegate the responsibility to each International Federation to determine the eligibility of Russian athletes to compete at the Olympic Games, led to other International Federations placing minimum testing requirements on the Russian National Federations (NF) just weeks out from the Rio 2016 Olympic Games. Entry requirements placed by International Federations on the NF led to requests to UKAD to ensure that relevant Russian athletes were tested in advance of the Olympic Games as well as for other international competitions. Not only was this not feasible from a capacity perspective, but it would have completely undermined the integrity of a no advance notice testing programme devoid of interference from RUSADA or Russian NFs. In addition to this, it created significant levels of confusion and uncertainty around which athletes and sports would or would not be eligible to participate in the Rio 2016 Olympics.

It should be noted that whilst the IAAF worked with ARAF to coordinate the testing and delivery of these entry requirements, given the very finite pool of DCOs available to conduct testing in Russia (less than 30 at the time), this had significant impact on capacity and UKAD's ability to conduct testing. The primary SCA which was operational in Russia did not have capacity to

deliver both the UKAD and the IAAF/ARAF testing programmes in their entirety. Given that UKAD often appeared to have more specific timeframes on test requests, this often worked to UKAD's disadvantage, with many requests being rejected due to the competition for limited resources with the IAAF/ARAF testing programme.

Ultimately a comprehensive pre-Games testing programme was delivered. UKAD conducted 890 tests across 27 of the Olympic sport/disciplines on the 284 athletes confirmed as competing for Russia at the Rio 2016 Olympics. Taking into consideration International Federation testing, in the period 1 January – 5 August 2016, 97% of the final Russian team were tested at least once, with 29 of the 34 sport disciplines being represented by Russia having 100% of their athletes tested during this period.

Whilst a pre-Paralympics programme was being delivered, the IPC announced on the 7 August 2016 that the Russian Paralympic Committee (RPC) was banned from the Rio 2016 Paralympics and therefore no Russian para-athlete was eligible to compete.

Running a Rio 2016 pre-Games testing programme would be a key focus of the project.



IPC Re-Instatement Criteria

In late 2016, following the IPC's ban of the RPC from the Rio 2016 Paralympic Games, the IPC implemented a set of re-instatement criteria for the RPC, like those being implemented by other International Federations. These criteria were specific to the re-instatement of the RPC in major events. They were comprehensive and stipulated minimum testing levels for prospective athletes attending an IPC sanctioned event, as well as the requirement for all such athletes to be included on RUSADA's RTP.

It was clear to UKAD, that such criteria would have a significant impact on UKAD's delivery of the RUSADA testing programme. Therefore, a significant amount of time and resource was used on regular engagement and discussion with the key parties involved – the IPC, UKAD, RUSADA (via the WADA International Experts) and the RPC – in a bid to find a solution that satisfied all. This engagement effectively continued up to the point the delivery of the testing programme transitioned from UKAD to RUSADA (July 2017), and therefore UKAD was ultimately not involved in the final outcome.

Whilst this was an impact of time and resource, it should be stressed the IPC understood the challenges its criteria were likely to pose, and its desire to find a common resolution was apparent.

Intelligence

UKAD's aim was to deliver an intelligence-led risk-based testing programme. Whilst developing intelligence and conducting investigations remained the responsibility of RUSADA, all intelligence was shared by RUSADA with UKAD's Intelligence Team. UKAD adopted the processes and principles for the collation, analysis and dissemination of intelligence that are used for UKAD's national anti-doping programme.

Wherever feasible, UKAD generated its own intelligence to feed into the RUSADA testing programme, including using information collected from testing sessions, analysis of AAFs and open source research. The latter was a significant challenge given the language barrier, as well as often poorly constructed National Federation websites. However, some open source research proved successful, for example an athletics website containing not only athlete performance data, but links to Athlete Support Personnel. This enabled UKAD to build an understanding of different training groups within certain disciplines.

All relevant intelligence was disseminated to the Project Testing Officer for their consideration for the testing programme.

Athlete Biological Passport (ABP) and Athlete Passport Management Unit (APMU)

UKAD's project to deliver an ABP programme was met with challenges. Given the geographic scale of Russia, challenges with the export of samples, and the lack of a WADA-approved ABP laboratory in Russia, meant that collection of ABP blood samples did not take place until May 2016. At this stage, the Moscow laboratory was approved to conduct the analysis of ABP samples.

The implementation of an external APMU also became a priority for the project, as no APMU was in existence, and therefore there was no mechanism for reviewing atypical results as they occurred in the testing programme. Whilst the APMU was to be contracted to RUSADA, UKAD facilitated the process of appointing an APMU, contacting multiple European-based WADA-accredited laboratories, as recommended by WADA. This process was an additional responsibility placed on the Project Testing Officer that had not previously been scoped when considering resource allocation to the project.

Following negotiations, the WADA-accredited laboratory in Ghent was appointed as RUSADA's APMU for the ABP and Steroidal programme. In addition to the ongoing review of the ABP and steroidal programmes, the APMU was also requested to conduct a historical review of atypical profiles within ADAMS to provide any further recommendations, leading to many additional recommendations for follow-up testing. As per standard procedure, this process was managed through ADAMS, with only UKAD having access to the APMU's reviews, comments and recommendations. Whilst managing APMU reviews and recommendations is a hugely important part of any testing programme, UKAD underestimated the impact this had on the Project Testing Officer's time. For UKAD's own national testing programme, this role is coordinated by members of UKAD's Science & Medicine team, therefore reducing the time impact on the Testing Team.



Therapeutic Use Exemptions (TUEs)

TUEs were managed using the same process as is used for UK athletes (managed through ADAMS) again reducing the operational burden to UKAD. RUSADA TUE applications were managed by the Medical Programme Officer (MPO) outside of core working hours to avoid any impact on the performance of their key objectives. The time spent on RUSADA related work was chargeable at an hourly rate. Therefore, no additional part-time staff member was needed.

The composition of the UKAD TUEC changed over the duration of the project, with new members being inducted and several members ending their term on UKAD's panel. Given the potential complexities and challenges involved in reviewing RUSADA TUEs (see below), UKAD determined that only experienced TUEC members were involved in the review of RUSADA applications and that new TUEC members were only introduced into a review panel after reviewing UKAD TUEs for at least six months. This principle was also adopted for new members of staff into UKAD's Science & Medicine team who were not able to process RUSADA TUEs until they had six months' experience within the role of MPO.

Having experienced TUE Committee members and UKAD TUE staff involved in the project was essential. Due to differences in medical practices within Russia, numerous applications were rejected, and given the often-complex nature of the applications, ongoing communication with RUSADA TUE staff was required. It should also be noted, as with the testing programme, the scope of UKAD's role often extended beyond that of simply processing TUEs, with ongoing advice and guidance being provided to RUSADA TUE staff on any matter relating to the TUE process (for example in relation to the Results Management process).

Despite the RUSADA TUE review process requiring a considered and lengthy review by each panel member, this did not come at the expense of the UKAD TUE programme. The UKAD TUEC performed commendably under the increased demands placed upon them.

The following are the key statistics for UKAD's delivery of RUSADA's TUEs :

	Received	Approved	Rejected	Cancelled	Approx. Time spent by MPO*
2016	18	14	3	1	59 hours
2017	40	24	13	3	132 hours
2018	28	11	15	2	54 hours

DCO Training

DCO capacity in Russia was limited at the start of the project (and for a significant period of the project's duration), with fewer than 30 DCOs either residing within Russia or able to access Russia without the need for a VISA from two different SCAs. Delivery of DCO training was therefore built into UKAD's role within the project and was a key deliverable.

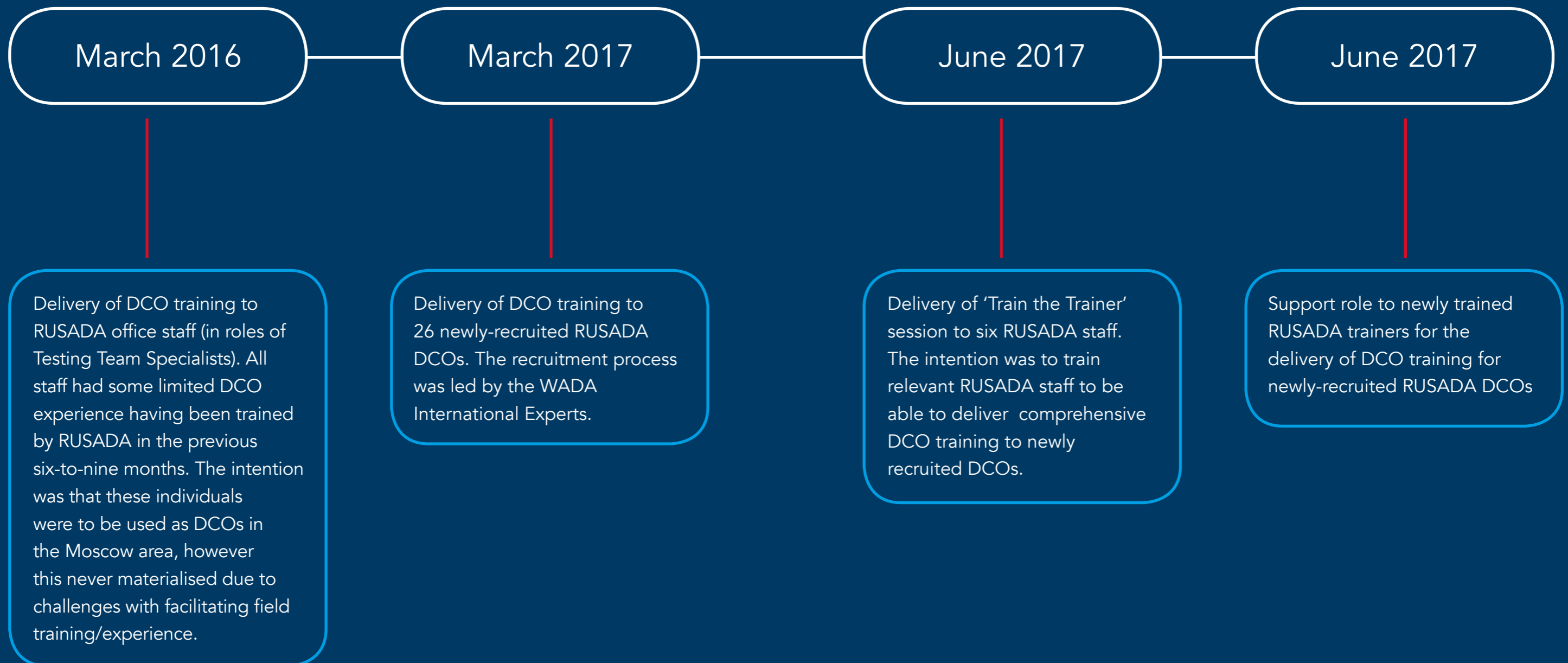
In the short term, delivery of the training was designed to expand capacity and enable greater levels of testing. In the long term, the intention was to build a self-sustaining system whereby RUSADA could deliver its own training. In total, UKAD delivered/ facilitated four DCO training sessions. All sessions were delivered in accordance with UKAD's DCO training process, and delivered by experienced UKAD DCO Trainers, with the support of the Project Testing Officer. At the completion of each training session, UKAD provided feedback to RUSADA and the WADA International Experts on each candidate, with a recommendation for whether the DCO should be considered for recruitment or not, or required further training/support.

Fewer than 30 DCOs were available to conduct sample collection at the start of the project



Doping Control Officer training

Timeline





For the DCO training in March 2017, UKAD agreed to partner with FINCIS (Finnish NADO), which provided one Russian speaking DCO to assist with the DCO training. With varying English language skills across the new recruits, having a Russian speaking DCO trainer proved invaluable.

UKAD's focus for RUSADA's DCO training was on the 'in-house' training – delivering practical based training in a controlled environment. UKAD did work with RUSADA and IDTM to agree a suitable process to ensure that sufficient field training and support was also delivered for all new DCO recruits. This was primarily led by one of the WADA International Experts.

Whilst the DCO training programme did not resolve the challenge of limited DCO capacity for the first 16 months of the project, it has enabled RUSADA since summer 2017 to expand and develop its DCO resource. This has enabled RUSADA to deliver higher levels of testing than previously possible in the initial stages of the project.

Handover of Test Planning and UKAD's Mentoring Role

In June 2017, WADA determined that RUSADA had met all the criteria in part one of the Roadmap to Compliance and whilst 12 criteria had yet to be met, RUSADA could resume planning and co-ordinating testing. RUSADA remained non-compliant and UKAD retained responsibility for the management of TUE. Prior to this, UKAD delivered a DCO training course, 'Train the Trainer', and supervised the delivery of the first DCO training course to be delivered by RUSADA staff. This gave RUSADA a good base of DCOs in major cities with which to start conducting testing and trainers to enable recruitment to continue. The management of TUEs continued by UKAD until September 2018 – the point at which RUSADA's compliant status was returned to them

by WADA. At this point, UKAD completed the TUEs which it was currently processing whilst declining to deal with any further applications (despite RUSADA's request that we do so).

In the lead up to RUSADA implementing the testing programme, UKAD provided guidance and advice around how to develop testing plans at a macro and micro level during a visit by RUSADA to the UK (February 2017) and one of UKAD's visits to Moscow (May 2017).

Upon the handover of test planning to RUSADA, a significant piece of work was conducted by the Intelligence Analyst assigned as part of the project. All intelligence received, collated and analysed, as well as related actions and outcomes, was compiled and reported to WADA and RUSADA.

UKAD's mentoring continued remotely until UKAD's complete disengagement in September 2018, following WADA's announcement of RUSADA's reinstatement. Mentoring took place over email, via weekly phone calls between RUSADA's Head of Testing and the Project Testing Officer at UKAD, and feedback on RUSADA's annual and monthly testing plans.

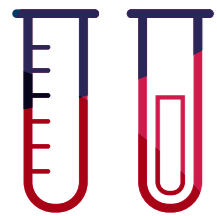
At all times during this period, UKAD had oversight of all RUSADA test plans.

Statistics – Testing Programme

The following are some key statistics from UKAD's delivery of the RUSADA testing programme (15 February 2016 – 16 July 2017):

	2016		2017	
	In-Competition	Out-of-Competition	In-Competition	Out-of-Competition
Urine	593	1258	665	911
Urine; Blood	9	155	0	104
Urine; Blood Passport	0	617	2	303
Urine; Blood; Blood Passport	0	99	0	74
	602	2129	667	1392
TOTAL	2731		2059	

UKAD delivery of the RUSADA testing programme



4,790
Test conducted



74%
Conducted Out-of-Competition



89%
of these cancelled tests
were due to SCA capacity



265 incident
reports were logged on UKAD's
Intelligence Management
database to support future
intelligence led testing



89%
of tests conducted
in Russia



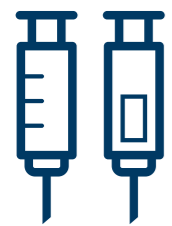
85%
Successful collection rate



79
Adverse Analytical
Findings (AAF)



51
AAFs were for Meldonium



Testing took
place in
different sports **37**



Testing took place in
of the 90 regions of Russia **66**



21 Non-analytical
findings including a Refusal,
Whereabouts Failures and
ABP cases



240
Whereabouts Failures issued

It is important to highlight the number of tests that were cancelled during the period that UKAD was delivering RUSADA's testing programme (2571), with 89% of those being cancelled due to SCA capacity. This clearly highlights one of the core challenges UKAD faced in delivering as effective a testing programme as it would have desired.

Following the handing over of test planning responsibilities to RUSADA, UKAD as a mentor, had oversight of close to 10,000 tests planned and delivered by RUSADA (from 16/7/17 – 31/8/18).

Operational Security

Operational security was taken very seriously by UKAD, as with all foreign trips. This included health and safety, operational security, IT security and information security.

Prior to, and throughout the project, the Foreign and Commonwealth Office (FCO) was engaged and updated by UKAD. Ahead of the the project commencing, engagement with the FCO enabled UKAD to confirm that appropriate operational security measures were being implemented. Ongoing engagement with the FCO was also key due to the evolving geopolitical landscape between the UK and Russia. Ultimately this had no impact on UKAD's project delivery, however it was carefully monitored.

Management of Financial Risk

A key part of initial contract negotiations with RUSADA was the agreement of a monthly fee, paid in arrears, for the work that UKAD staff were to be conducting. During the delivery of the RUSADA programme, a deposit was retained equivalent to 10 weeks of work to reduce the financial risk to UKAD should a monthly payment not be received. Later in the programme when RUSADA began conducting its own testing, the monthly amount was reduced, and the deposit was also reduced in line with this, owing to the reduction in work for UKAD staff.

The majority of testing conducted during the programme delivery was by IDTM and PWC, both of which were paid directly by RUSADA, thereby avoiding any financial risk to UKAD. In addition, samples that were stored by laboratories were also paid for directly by RUSADA. The main area of potential financial risk to UKAD was in testing conducted by other NADOs on RUSADA's behalf. To reduce the number of contracts that were required to be drawn up and to enable testing in the short timescales required, existing contracts between UKAD and the other NADOs were used instead of contracts between the various NADOs and RUSADA. This practice was implemented given the length of time it had taken for contracts to be drawn up between RUSADA and other organisations (e.g. SCAs) and the need to test Russian athletes outside of Russia. UKAD was invoiced for the testing and this cost then passed on to RUSADA. The deposit was again used to mitigate the financial risk from this process. After RUSADA began conducting testing, for an interim period, it was able to continue to use the agreements that UKAD had with other NADOs whilst its own agreements were finalised. All tests conducted in this manner were authorised by UKAD to maintain oversight of any potential financial risk.

Key Interlocutors from Russia and RUSADA

Russian government officials were primarily engaged with WADA staff and the WADA International Experts however during initial discussions and the first visit to Russia UKAD was involved in discussions involving the then Sports Minister, Vitaly Mutko, (now Deputy Prime Minister). Pavel Kolobkov has succeeded Vitaly Mutko as the Sports Minister.

Engagement with RUSADA staff was important to the successful delivery of the project. Without this interaction, delivery of a testing programme from a remote location would simply have not been feasible. Interaction however, where relevant, had to be 'one-way' – with RUSADA staff sharing information and being tasked with actions, whilst not having exposure to any of the detail of the forthcoming testing programme.

RUSADA – Director General

Following RUSADA being made non-compliant, all but a very small number of staff were removed from post. This included the Director General, who was removed from post prior to UKAD formally starting on the project. During UKAD's involvement in the project, the following individuals have acted as Director General:

- Anna Antseliovich – Acting Director General (Dec 2015 – Mar 2017) – formerly Head of Results Management Department
- Tatyana Chirkina – Acting Director General (Mar 2017 – Jul 2017) – formerly Head of Accounting and Finance Department
- Yuriy Ganus – Director General (Aug 2017 - current) – external appointment



When starting the project, and establishing roles and procedures/processes, interaction with the Acting Director General (Anna Antseliovich) was regular. Following the appointment of the WADA International Experts, communications with the Acting Director General (and subsequently Director General) were far less frequent, and often limited to contractual and financial matters. Interaction with Yuriy Ganus was very limited as his appointment was after RUSADA was able to conduct testing again and therefore UKAD's day-to-day involvement was decreasing.

WADA International Experts

In April 2016, two International Experts were appointed by WADA on a two-year contract, to lead the reform of the Russian anti-doping programme and rebuild confidence in RUSADA. These individuals were Peter Nicholson, who has a background in international criminal investigations and Ieva Lukosiute-Stanikuniene, the Director of the Lithuanian Anti-Doping Agency. Interaction with the WADA International Experts replaced the interaction with the then Acting Director General. RUSADA – Operational Staff

The primary interaction with RUSADA throughout the project was the day-to-day communication with a number of RUSADA's operational staff. Whilst many staff were removed from/vacated their posts (including then Head of Testing), those who remained had primarily only been in post for a short period of time or were in roles not directly related to the issues leading to non-compliance.

In the initial phases of the project, interaction was primarily with the following groups of individuals:

- Specialists in Department of Testing Organisation – responsible for sharing information with UKAD to help inform the testing programme (for e.g. competition schedules)
- Specialist/Head of Results Management Department – responsible for results management. This individual was in post for the duration of UKAD's involvement.
- Investigator – responsible for sharing intelligence with UKAD on Russian athletes. This individual was in post for the duration of UKAD's involvement.
- TUE and ABP Specialist – responsible for interaction relating to TUEs.
- International Cooperation Department staff – responsible for coordinating logistics of all visits to Moscow

RUSADA staff have worked closely and productively with UKAD staff throughout the project although staff turnover at RUSADA did cause difficulties with consistency early on. In early 2017, the Head of Testing and Head of Science were appointed and became the main points of contact at RUSADA for UKAD's delivery of the testing programme. The delivery of training for DCO in Russia was supported by the former Head of Education and Athlete Support and now Deputy Director General for RUSADA.

Challenges faced and lessons learned

Challenges in Delivery and Outcomes

As has often been referenced in this paper, a project this unique and of this scope clearly has presented numerous challenges. The following table seeks to summarise the key challenges in delivery:

Challenge

Effective project planning and resourcing for a project of unknown quantity

Commentary

The original scope of the project was six-to-nine months and was time critical. The project scope extended in total to two years seven months, with the scope of UKAD's role evolving throughout the duration of the project. In hindsight, this should have been expected given the unique situation being faced. However, such lack of clarity and evolving allegations and investigations made effective project planning and management challenging. UKAD had to operate reactively to changes affecting the project – for example the introduction of WADA's Roadmap to Compliance – and respond to the challenge of ensuring the project was effectively resourced (whilst attempting to protect those staff working on the project from burn-out).

Delivering a testing programme remotely

Whilst the Project Testing Officer was an expert in testing, they were naturally not an expert in Russian sport. Planning and implementing an effective TDP is hugely challenging when faced with a different sporting landscape, unfamiliar sports and athletes, a lack of information (or understanding of where to find such information) and a different language.

Challenge

Delays in contract negotiations and finances

Commentary

During the initial phase of the project there were significant issues with logistical and administrative delays around contracts with RUSADA, including those with external suppliers and delays to payment of SCAs which resulted in the cessation of testing until this was resolved.

SCA capacity

SCA capacity was a huge challenge to the delivery of the testing programme, especially when faced with the logistics of testing in the largest country in the world and one of the biggest populations. With a combined DCO resource of less than 30, in 2016 almost 50% of test requests that were sent to the SCAs were declined. This was significantly strained prior to the Rio 2016 Olympic Games when International Federations (using the same SCAs) increased testing of Russian athletes. Whilst this improved through 2017, it remained a challenge throughout the programme.

In addition to this, there were often delays in RUSADA receiving doping control paperwork, which in turn impacted results management timeframes.

Closed cities

Russia has 44 closed cities where access is highly restricted. This is usually owing to sensitive military material or other information in those cities. Access is particularly restricted to non-Russian citizens and those working for non-Russian organisations. Very few athletes live and train in these cities, but a small number do. Determining which athletes had the closed cities in their whereabouts and testing them was almost impossible. RUSADA worked across government departments to enable the DCOs from IDTM and PWC to be granted passes for these cities on an annual basis, reducing the risk of the athlete receiving advanced notice of testing.

Challenge

Language

Commentary

Language presented a significant challenge, e.g. limiting the ability to collate information for the testing programme, language of intelligence received, spelling of names in ADAMS, translation of athlete whereabouts, quality of translation of TUE applications (with TUEC members often struggling to understand supporting medical evidence ultimately leading to the TUE application being rejected). All such challenges created delays in the delivery of testing and TUE programmes and analysis of intelligence. Translation challenges also led to delays in contract negotiations.

Language also made UKAD's delivery of DCO training more of a challenge. However, this was overcome using a Russian speaking DCO from FINCIS and RUSADA staff and did not impact the integrity or the effectiveness of delivery.

Whereabouts and access to athletes

Locating athletes for testing consistently presented challenges. The quality of whereabouts provided was often poor, in addition to RUSADA often having significant challenges in contacting athletes to inform them of their inclusion in a testing pool and therefore their requirement to provide whereabouts information. This led to a large number of whereabouts failures. These challenges were replicated when attempting to deliver the re-instatement testing programme.

Access to competition schedules was also challenging, therefore making no-advance notice In-Competition testing difficult. Furthermore, DCOs often faced challenges gaining access to venues, as well as athlete support personnel often demanding to see paperwork and identification for all DCOs which delayed notification of athletes.

Challenge

Pre-Rio and IOC decision

International Federation testing criteria and IPC re-instatement criteria

Commentary

Delivery of a pre-Games testing programme was in itself a significant challenge, primarily due to lack of specific information and knowledge of prospective Olympic/Paralympic athletes (and therefore which athletes to target) as well as the size of the long-lists provided and the number of athletes to consider for testing. There was also uncertainty around what would happen to banned Russian athletes, and if they would be able to compete.

RUSADA's non-compliance meant Russian athletes competing at an international level were subject to a higher level of scrutiny than any other country. Some International Federations started imposing additional criteria such as a minimum number of tests for Russian athletes to compete at International Competitions. This created a challenge with the pressure to not deny athletes the opportunity to compete having to be balanced against ensuring the integrity and credibility of a risk-based testing programme. This further added to the challenges when attempting to deliver a pre-Games testing programme for Rio 2016.

Another example of this challenge was the IPC's re-instatement criteria following its decision to ban the Russian Paralympic Committee (RPC) from the Rio 2016 Paralympic Games. Stringent and comprehensive criteria were published for the RPC, which would have had a significant impact on the RUSADA national testing programme (and therefore UKAD's ability to deliver effectively). This required significant time and resource through engagement and discussion with the IPC, RUSADA, UKAD and the RPC, to try and determine a resolution suitable for all. It must be stressed however, the IPC's understanding of the challenges posed to UKAD/RUSADA and the desire to find a solution fit for all.

Challenge

Meldonium

Commentary

The introduction of Meldonium onto the 2016 Prohibited List, and the subsequent confusion over concentration levels and the impact on Results Management was a significant challenge. As a commonly used substance in Russia, a significant number of AAFs were reported for Meldonium in the first months of the project. Following guidance provided by WADA on managing Meldonium AAFs (given the long half-life of the substance), a significant amount of work had to be conducted on matching results to the revised Meldonium concentrations and timeframes as stipulated by WADA, to determine whether an ADRV could be processed. Ultimately this led to no ADRVs and was a significant drain on resources.

RUSADA staff turnover

During the initial stages of the project, there was significant turnover of RUSADA staff. Whilst this most likely was important to the international perception for the integrity of the organisation and its programme, this presented challenges for delivering a programme remotely. Important processes and procedures were agreed with RUSADA staff to ensure that the programme ran smoothly, however with turnover of staff this clearly creates challenges and inefficiencies.

Implementation of blood testing

Challenges with shipment of blood samples were faced due to issues with exporting samples and the custom regulations within Russia, as well as adhering to ABP blood sample transportation timeframes within a country the size of Russia. These issues were partially resolved when the Moscow laboratory was permitted to conduct analysis on ABP blood samples (end of May 2016) however there were still restrictions around the timing of blood testing.

Challenge

Project scope and 'mentoring'

Commentary

Whilst the contract clearly stipulated UKAD's role, often individuals working on the project were drawn into additional work in support of the project. From a testing perspective, there was a significant amount of work conducted around areas such as facilitating discussions between RUSADA and laboratories, assisting with the set-up of an APMU and results management for Whereabouts Failures and taking on ownership of the RUSADA ADAMS administration account. From a TUE perspective, the Science and Medicine Team also fulfilled additional roles such as; medication and substance enquiries, educating RUSADA TUE staff on timeframes for when a TUE application is necessary for substances that are prohibited in-competition only, the results management process after an AAF and initiating a TUE application.

It should be noted that fulfilling all such roles added significant value to the project and played a key role in RUSADA's development. However, these unexpected duties posed an additional demand on conducting this project and had an impact on resources.

Challenge

TUE and cultural differences

Commentary

The medical practices and diagnoses observed by physicians in Russia were at times unfamiliar to the UKAD TUEC. The use of substances such as Meldonium or Trimetazidine to treat unrecognised cardiovascular or neurological disorders were particular examples of such a challenge. Typically, an external cardiologist or neurologist was recruited to assist, however, these clinicians also had little exposure to the medical practices in Russia. Consequently, many of these applications were rejected.

Managing expectations

Throughout the project, some compromises had to be made in terms of what the desired/ideal programme should be versus what was logistically and practically possible. The level of testing on Russia in comparison to what RUSADA used to conduct was significantly less. Ongoing decisions had to be made about where we were able to compromise without impacting the integrity or quality of the testing programme e.g. when a test and type of analysis could take place. It was important that UKAD was able to continually react, review and adapt as the programme developed. The focus was always on quality versus quantity.

Disengagement

WADA declared RUSADA compliant on 20 September 2018 at the meeting of its Executive Committee in the Seychelles. On 28 September 2018, UKAD CEO Nicole Sapstead wrote to the RUSADA Director General Yuriy Ganus, giving him formal notice that UKAD would cease its work with RUSADA with immediate effect (save the processing of existing TUEs). The basis for this decision was that the original rationale for UKAD undertaking this work no longer existed and that this would be beyond the remit agreed by the UKAD Board.

Outcome

A Gap Filled

In the short term, a key positive outcome of this project from UKAD's, and the anti-doping community's, perspective is that Russian athletes continued to be tested in line with the World Anti-Doping Code and related Standards. UKAD's work ensured there was no significant 'gap' in testing during RUSADA's period of non-compliance and did so during the high-risk period that is the build up to a summer Olympic and Paralympic Games. Whilst UKAD's delivery of a testing programme on Russian athletes did not completely restore confidence across the athlete community, it did go some way to provide the athlete community the assurance that Russian athletes were being tested, and being done so by a credible, reputable and independent NADO.

The start of rebuilding RUSADA's expertise and capacity

As previously stated, the scope of UKAD's involvement in this project, far exceeded initial expectations. Throughout the duration of the project, UKAD provided guidance, advice and support to RUSADA staff (across all areas of the project) and acted as a mentor in the latter stages of the project. The sharing of UKAD's expertise has played a key role in the process of rebuilding RUSADA's capacity, helped develop its expertise and implement necessary structures and processes to enable RUSADA to operate as a NADO again. That WADA had sufficient confidence in RUSADA's processes and systems to allow them to run the testing programme from June 2017 and that it has been able to have a period of delivery whilst being supported and mentored by UKAD provides greater confidence for future delivery.

UKAD's work on DCO training has also played an important role in addressing a key challenge in Russia – DCO capacity. Not only has UKAD trained a number of RUSADA DCOs to a very high standard, but in delivering 'Train the Trainer' sessions it has enabled RUSADA to be self-sufficient and continue to build its DCO capacity across Russia.

RUSADA building its international relationships

UKAD's involvement in the programme has provided RUSADA a platform to build its international relationships with other NADOs and International Federations. UKAD has been able to leverage support for RUSADA from other NADOs in relation to areas in which they have a greater level of expertise. For example, the Canadian NADO (CCES) has been able to offer logistical advice for testing in a country with a significantly larger area than the UK, for example in relation to DCO recruitment.

Enhancement of WADA's Code Compliance monitoring process

Whilst not an outcome of UKAD's involvement of the project, it is important to recognise that the matter of non-compliance in Russia appears to have had a significant impact on WADA's processes and policies for monitoring Code compliance. In 2018, WADA introduced the new International Standard for Code Compliance by Signatories (ISCCS), which clearly defines processes, timeframes and (importantly) repercussions for the non-compliance of an ADO. It is clear that the lessons learned from RUSADA's non-compliance have helped shape this new standard – for example one possible repercussion for non-compliance is that the relevant functions of an ADO's programme (e.g. testing) are delivered by an independent, credible Code compliant ADO for the duration of non-compliance.

UKAD Staff Development

The development opportunity presented to the UKAD staff involved is an important outcome of the project. The project presented frequent challenges for the UKAD staff who worked under challenging circumstances and tight deadlines. Their experience is an asset to current UKAD operations and their high standard of professionalism was noted by WADA.

Lessons Learned

Involvement in the RUSADA project was a first for the organisation, and in many ways unique in terms of the challenges faced. This project has provided a greater understanding of the challenges faced in delivering such a programme, and several lessons were learned throughout. These are summarised below.

Set Realistic Expectations

It is clear from UKAD's planning work prior to formal engagement in the project, that the intention was to deliver as comprehensive and robust a testing programme as is delivered as part of UKAD's own national testing programme. This was simply not feasible. There were several challenges that limited this – whether it was SCA capacity, cultural and language differences or the different sporting landscapes and challenges that different countries face – and UKAD soon realised it had to realign its expectations without compromising the integrity and purpose of the project. Whilst they added significant value, it was not possible to simply apply UKAD processes and procedures to the different areas of the project, as there is no 'one size fits all' approach to such a project.

There are areas of the project UKAD would have wished it could deliver more comprehensively – for example greater investigative engagement to better develop the intelligence picture to feed into the testing programme. But given the challenges of such a project, UKAD had to set more realistic expectations.

Adaptability is Essential

As indicated above, solely applying UKAD's processes and procedures was not the solution to successfully delivering this project, and hence adaptability and being of open-mind was important. Moreover, the situation of RUSADA non-compliance was the first of its kind and with hindsight, it is clear to see that UKAD's involvement would not only be six-to-nine months as initially believed. UKAD had to continually adapt its delivery, approach and role throughout the duration of the project, reacting to the evolution of the plan to rehabilitate the Russian anti-doping organisation and its operations.

Throughout the project UKAD always reacted positively to such changes, for example embracing the changes to the duration of project and its role following milestones such as the appointment of the WADA International Experts and development of the Roadmap to Compliance. That adaptability was essential to the successful delivery of the programme and longer-term rehabilitation of RUSADA.

UKAD staff operated under challenging circumstances and their high standard of professionalism was noted by WADA



Resource requirements should not be underestimated

It goes without saying, that appointing resources with relevant expertise is a must. The initial stages of the project were resource intensive, with a significant level of project planning and management required, whilst starting to deliver the project simultaneously (time pressures for the project meant there was little time to focus effectively on project planning). Therefore, assigning a project manager in the initial stages of the project, enabling the Project Testing Officer to focus on delivery, would have been beneficial.

Where time permits, taking a step back and focussing on developing as comprehensive a plan as possible prior to starting delivery, would be ideal. However, in such scenarios, time pressures around starting delivery are likely to exist.

The changing scope of such a project, and breadth of challenges that are to be faced should also not be underestimated, and the project should be resourced appropriately to enable effective and successful delivery. For example, TUE applications were the most complex applications the Medical Programme Officer and TUEC had ever had to manage, and the project extended beyond just running a testing programme, with the Project Testing Officer's expertise and advice being sought on other anti-doping areas.

It should also be noted, that where possible, having resources with appropriate language skills add significant value.

The Importance of UKAD's International Influencing Strategic Objective

UKAD's involvement, and successful delivery of such an important project, demonstrates the importance of UKAD's international influencing work and its place in UKAD's Strategic Plan. RUSADA's non-compliance was a global issue, impacting clean athletes on a global scale, including in the UK. UKAD's work on this international project has played an integral role in what it hopes is for the longer-term rehabilitation of RUSADA, a levelling of the global playing field, and therefore protecting the rights of clean UK athletes and those around the world.

ADO non-compliance is a global issue – communication is therefore key

Whilst this has been stated above, it's important to also stress that as a global issue, the matter of RUSADA non-compliance impacted a significant number of partners and stakeholders – from International Federations, to the IOC and IPC and of course athletes within and outside of Russia. Not all stakeholders necessarily held the same view on how to manage the period of RUSADA's non-compliance, and decisions made by other stakeholders had the potential to impact UKAD's successful project delivery. For example, the differing decisions made by the IOC and IPC regarding Russian eligibility for Rio 2016, or the International Federation testing eligibility criteria for international level Russian athletes.

Due to this, when engaged in such a project, stakeholder mapping and clear and regular communication across all stakeholders is essential. As a starting point, clear messaging around a NADO's role and responsibility in such a project is hugely important not only to other ADOs and partners, but to athletes (both within and external to the country in question). Such communication must be led by WADA.

The need to build strong working relationships

Building strong relationships with both WADA and RUSADA was important for the successful delivery of the programme. Visits to Russia, whilst time consuming and logistically challenging were invaluable in building this understanding and gaining a greater insight into the challenges that would be faced in the long term. Understanding these longer-term plans and potential challenges helped to ensure that appropriate processes were put in place to support the delivery of a strong, independent anti-doping programme in the future.

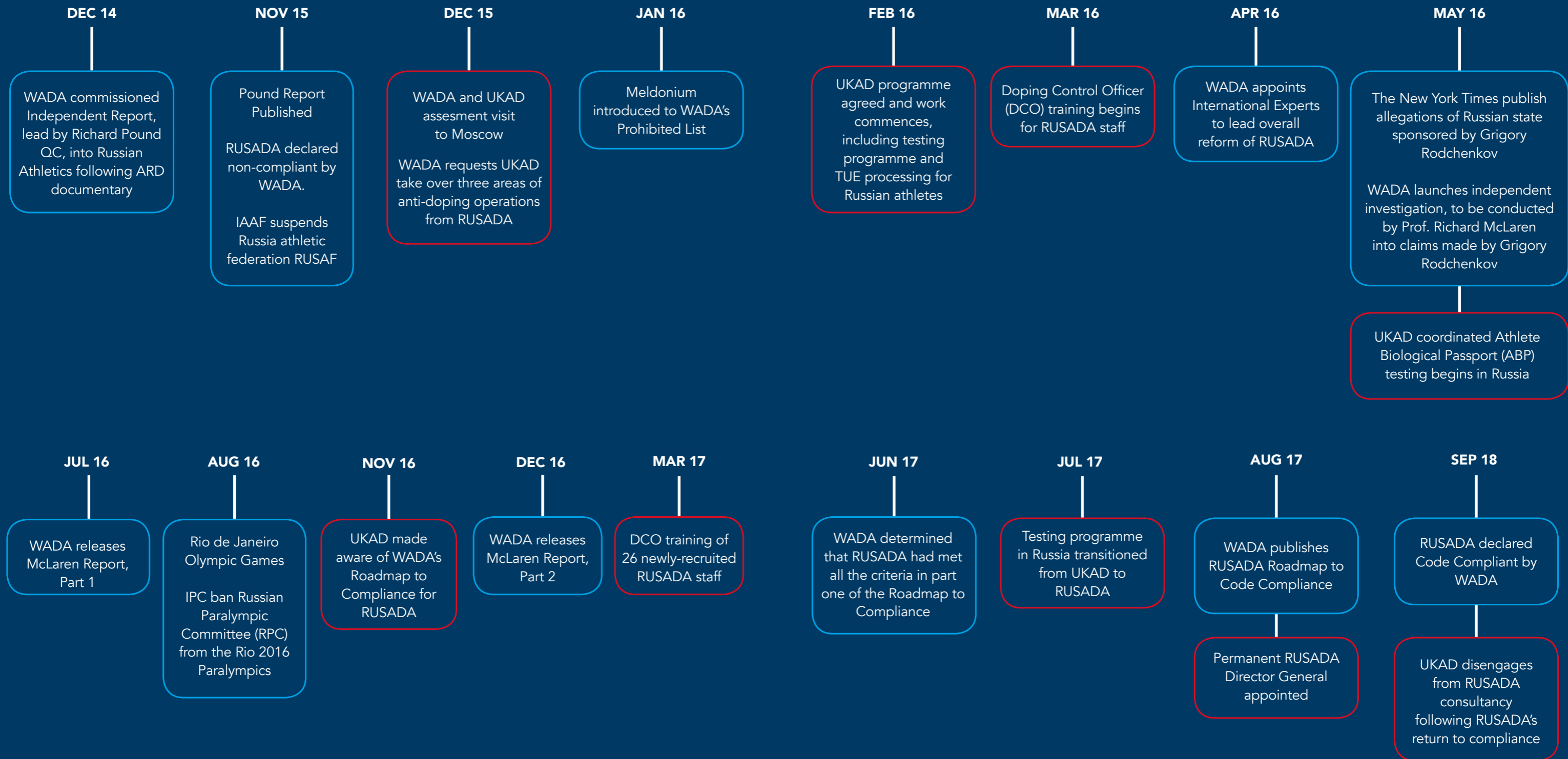
Risk management is essential

Whilst engaging in such a project clearly aligns with UKAD's strategic objectives, it does not come without risk. Therefore, involvement in such a project required an Extraordinary UKAD Board meeting and vote. Managing risk has been integrated into UKAD's day to day practices for a number of years now, and involvement in the RUSADA project was no exception. It was important that prior to engagement, UKAD had clearly mapped out and put necessary measures in place to manage the risk across all areas of the project. These were all successfully managed due to UKAD's proactive, considered approach to risk management, which is embedded at all levels of the organisation through a formal Risk Management Strategy.



UKAD RUSADA Timeline

● UKAD Activity ● WADA Activity





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