Compendium of International Organisations' Practices

Working Towards More Effective International Instruments

Snapshots of IO Practices

World Anti-Doping Code compliance monitoring

Organisation(s): World Anti-Doping Agency (WADA)

The Snapshots of IO Practices present examples of specific efforts undertaken by an international organisation to work towards more effective international instruments. They aim to highlight examples of practices within the five focus areas of the Partnership of International Organisations for Effective International Rulemaking (IO Partnership), namely the variety and development of international instruments, their implementation, evaluation, ensuring stakeholder engagement, and co-ordination among IOs. The snapshots are submitted by the secretariats of the relevant international organisations implementing the relevant practice. The practices were compiled by the OECD Secretariat and focal points of the IO Partnership (UNCITRAL, OIE, WHO, ISO, WCO, BIPM, and SIECA), with a brief review to ensure consistency and comparability of the information provided within the snapshots. The inclusion of a practice in these snapshots implies no endorsement or assessment of that practice on the part of the OECD Secretariat or the focal points of the IO Partnership.

1	Overview of the Practice	Answers	Comments and intersections
1.1	Organisation	World Anti-Doping Agency (WADA)	
1.2	Area of relevance among the IO partnership focus themes (variety of instruments, implementation, stakeholder engagement, evaluation, co-ordination)	Implementation – Monitoring mechanisms	
1.3	Name of the Practice	World Anti-Doping Code compliance monitoring (part of the compliance program)	
1.4	Name of person(s) completing the template	Florence Lefebvre-Rangeon, WADA	

2	Description of the Practice	Answers	Comments and intersections
2.1	Please describe the practice shortly, providing information on its core features.	The World Anti-Doping Agency (WADA) is the international, independent agency tasked with co-ordinating, monitoring and promoting the fight against doping in sport. One of its core activities is to monitor the compliance of Signatories with the World Anti-Doping Code (Code) and its supporting International Standards. Signatories are defined in the Code as 'those entities signing the Code and agreeing to comply with the Code as provided in Article 23'. They include International Federations (IFs), National Anti-Doping Organizations (NADOs), Major Event Organizations (MEOs) and National Olympic Committees (NOCs), among others. The monitoring program is based on the use of various complementary programs and tools: - Code Compliance Questionnaire: online self-help tool which permits self-assessment by Signatories with a view towards enhancing their anti-doping programs. - Continuous monitoring: ongoing monitoring of critical anti-doping activities that leads to early detection of potential compliance issues and allows WADA to take timely action to support Signatories to undertake corrective actions. - Audits: retrospective, systematic assessment of a Signatory's anti-doping program, conducted by WADA auditors either at the Signatory's headquarters or remotely through a virtual audit. - WADA uses a number of systems to monitor Signatories' compliance including its Anti-Doping Administration & Management System (ADAMS), Code Compliance Center and Legal Results Management database.	

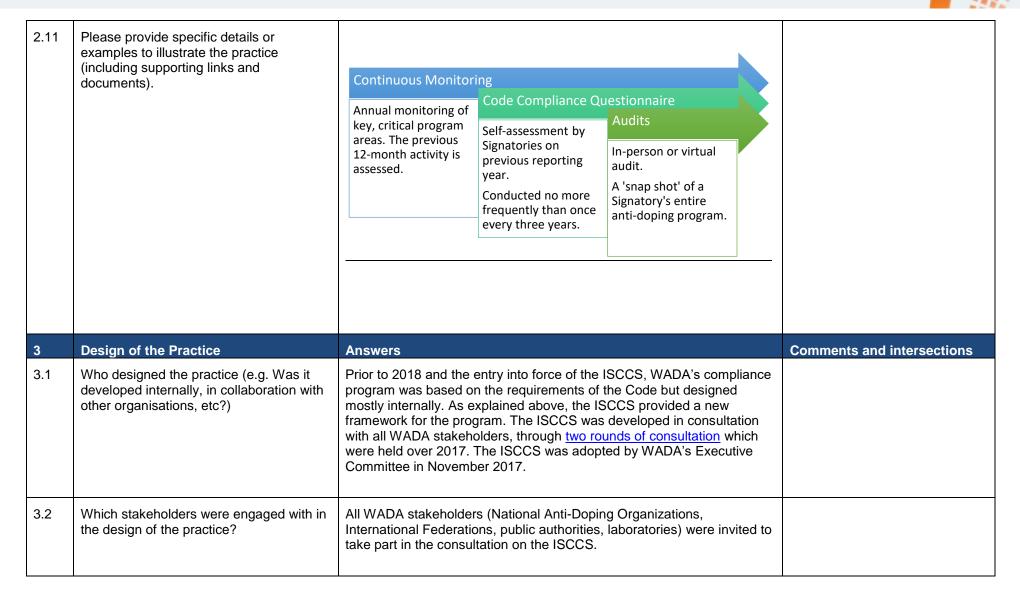| 2.2	What are the objectives of the practice?	WADA's compliance program aims at ensuring that Signatories across the world comply with the World Anti-Doping Code (Code) and its eight accompanying International Standards. The monitoring part of the program has been designed to ensure that effective programs and tools are in place for WADA to assess whether the Signatories do in fact comply with the Code.	
2.3	What have been the key results of the practice?	The adoption of the World Anti-Doping Code (Code) and the establishment of the Code compliance program has ensured that all countries and all sports are bound by a single set of anti-doping rules and held to the same level of accountability by the global regulator, WADA. Through its compliance monitoring programs, in 2019, WADA has assessed 190 Signatories for varying Code and International Standard requirements. The breakdown in details is as follows: - Continuous monitoring: 152 Signatories assessed - In-person audits: 18 Signatories assessed - Desk audit: 1 Signatory assessed - Code Compliance Questionnaire: 19 Signatories assessed	
2.4	In what year was the practice introduced?	WADA's compliance program was born from the coming into force of the World Anti-Doping Code on 1 January 2004. Article 23.4.1 stated that "Compliance with the Code shall be monitored by WADA or as otherwise agreed by WADA". Since then, the Code has been reviewed three times, with the latest iteration coming into force on 1 January 2021. WADA introduced the programs and tools listed above following the introduction of the 2015 Code, and the compliance program has continued to evolve and to become more formalised when the International Standard for Code Compliance by Signatories (ISCCS) entered into force on 1 April 2018. The ISCCS established a regulatory framework that strongly reinforced WADA's compliance program.	

2.5	Has the practice been updated/reformed since then? If yes, when and how has it evolved over time?	Yes – see response above	
2.6	What do you consider to be the primary strengths of the practice?	The primary strength of WADA's monitoring program resides in the combination of its various tools, which are of different natures: voluntary/mandatory; continuous/ad-hoc; targeted/general. The existence of these different tools allows WADA to get a strong overview of each of its Signatories if needed. Signatories are given every opportunity to fix compliance issues, with support and guidance from WADA, and with non-compliance as a last resort when all opportunities have been exhausted. The compliance monitoring program fosters continuous improvement of Signatories anti-doping programs and aims to ensure that they are sustainable over time.	
2.7	What do you consider to be the main challenges faced during the implementation of the practice?	The main challenge lies with the total number of Signatories to monitor (more than 300 in total), which makes it difficult to implement a full monitoring program considering the resources that WADA can dedicate to the program. This difficulty has led to the establishment of a Prioritisation Policy. This policy, which was approved by WADA's Foundation Board and accompanied the release of the ISCCS in April 2018, prioritises the category of non-conformities (critical, high priority and other) against the level or Tier of the Signatory (three Tiers were identified, Tier 1 representing the highest performing countries and sports). Therefore, logically, those Signatories who represent countries that are successful at Major Sporting Events and sports which are part of the Olympic and Paralympic Games are prioritised by WADA.	

2.8	Does the practice have a formal/normative basis within the organisation or is it conducted informally? Does this basis make the practice mandatory or voluntary? If there is formal basis, please provide the relevant link or documentation.	WADA's compliance program is framed by the International Standard for Code Compliance for Signatories, (ISCCS), which came into effect on 1 April 2018. The implementation of the ISCCS is mandatory, both for WADA and for all Signatories to the World Anti-Doping Code. The program has been ISO9001:2015-certified since May 2016, and external auditors re-assess the compliance monitoring program's certification annually.	
2.9	At what frequency is the practice applied? i.e. is it conducted once or on an iterative basis?	WADA's monitoring program is conducted on an iterative basis. WADA's Compliance, Rules & Standards department applies WADA's monitoring program on a daily basis.	
2.10	Is this practice applied systematically, (e.g. with respect to every normative instrument, according to specific criteria or on an ad hoc basis)?	WADA's monitoring program is applied systematically but with a prioritisation policy (see above).	

2.11	Please provide specific details or examples to illustrate the practice (including supporting links and documents).		

Continuous Monitoring

Annual monitoring of key, critical program areas. The previous 12-month activity is assessed.

Code Compliance Questionnaire

Self-assessment by Signatories on previous reporting year.

Conducted no more frequently than once every three years.

Audits

In-person or virtual audit.

A 'snap shot' of a Signatory's entire anti-doping program.

3	Design of the Practice	Answers	Comments and intersections
3.1	Who designed the practice (e.g. Was it developed internally, in collaboration with other organisations, etc?)	Prior to 2018 and the entry into force of the ISCCS, WADA's compliance program was based on the requirements of the Code but designed mostly internally. As explained above, the ISCCS provided a new framework for the program. The ISCCS was developed in consultation with all WADA stakeholders, through two rounds of consultation which were held over 2017. The ISCCS was adopted by WADA's Executive Committee in November 2017.	
3.2	Which stakeholders were engaged with in the design of the practice?	All WADA stakeholders (National Anti-Doping Organizations, International Federations, public authorities, laboratories) were invited to take part in the consultation on the ISCCS.	

3.3	How long did it take to design the practice?	The consultation, drafting and adoption process of the ISCCS was completed over a period of 6 months, which is a record time compared to the usual process for other International Standards developed by WADA.	
3.4	What resources were needed to design the practice initially (i.e., staff, budget etc.)?	The development of the ISCCS required 2 staff members working full time for a period of 6 months with supporting operational budget. The Standards and Harmonization department has increased its resources gradually since 2015 and a new department was established, the Compliance Unit, to centralise and co-ordinate activities. WADA also developed a new IT system, the Code Compliance Center to store all compliance related responses from Signatories.	
3.5	What challenges were encountered during the design of the practice and how were they overcome?	The implementation of the compliance monitoring program occurred alongside WADA developing an accompanying IT infrastructure. Programs and tools were therefore rolled out in phases. The program was unprecedented within WADA and lessons have been learned on a regular basis.	
3.6	Has the practice been tested before implementation (i.e. pilot phase)? If yes, please describe.	The Code Compliance Center involved a small number of IFs and NADOs in the development and testing of the IT system. In addition, for both in-person and virtual audits, a pilot was conducted to test documentation, procedures and reporting.	

4	Implementation of the Practice		Comments and intersections
4.1	Which units are responsible for implementing the practice within your IO?	WADA's Compliance, Rules & Standards Department .	
4.2	Are IO members involved in implementing the practice? If so, how?	No.	
4.3	Are external actors beyond the organisation or its membership involved in implementing the practice? If so, how?	External auditors coming from other Anti-Doping Organizations are part of the audit teams (one to two external auditors per audit team).	
4.4	Which resources are needed to implement the practice (e.g., staff and budget)?	WADA's Compliance, Rules & Standards Department is staffed with 11 employees as of June 2020, all of whom participate in one or all of the programs described above.	
5	**Outputs and Evaluation of the Practice**	**Answers**	**Comments and intersections**
5.1	Has the practice been evaluated or reviewed?	WADA publishes annually a [Compliance Report](#), which is reviewed by the Compliance Review Committee. The ISCCS has been reviewed in the framework of the general two-year World Anti-Doping Code review process which took place in 2018-2019. As mentioned above, the program is also ISO9001:2015-certified and as such assessed by external auditors annually.	
5.2	If yes, who carried out the evaluation (please specify whether it was done internally or externally)	See answer above.	

5.3	If yes, please describe the evaluation methodology? (e.g. were any quantitative or qualitative indicators/criteria used to measure/assess the outcomes of the practice?).	The Compliance Report includes both quantitative and qualitative criteria. WADA's monitoring program is ISO9001:2015-certified. The scope of the certification is: "Compliance monitoring of anti-doping legislation/rules/regulations and implementation of policies and programs by Signatories to the World Anti-Doping Code". The ISO annual assessment requires a team of internal auditors conducting audits to ensure the quality management system is fit for purpose. External auditors also conduct annual surveillance audits to verify the quality management system is effective.	
5.4	If yes, what were the conclusions of the evaluation,and has the practice evolved subsequently? If possible, please attach related documents or provide a link.	Through the quality management system, an annual management review is conducted with risk and resources reviewed towards ensuring continuous improvement. This is also built into the publicly available Annual Compliance Report and an internal Annual Compliance Plan to ensure that lessons are learned from the previous year and built into objectives and key performance indicators.	
6	**Additional comments and information**	**Answers**	**Comments and intersections**
6.1	Is there any more information or documentation that would be valuable to share in relation to the practice (e.g. links, reports, meeting minutes, supporting documents)?	- WADA's Compliance Strategy - 2019 Annual WADA Compliance Report - Q&A on WADA's compliance program - List of Anti-Doping Organizations declared non-compliant	
	Sources		