



POLICY FOR GATHERING ANTI-DOPING INTELLIGENCE

HONG KONG ANTI-DOPING COMMITTEE

INTRODUCTION AND SCOPE

The purpose of this policy is to describe Hong Kong Anti-Doping Committee's ("HKADC") procedures to ensure gathering, assessment and use of intelligence in accordance with Article 11 of the International Standard for Testing and Investigations (ISTI).

RESPONSIBILITIES

HKADC's Head of Office is responsible for the implementation and follow-up of this policy and subsequent procedures.

HKADC'S POLICY FOR HANDLING ANTI-DOPING INTELLIGENCE

1. Security and Confidentiality

HKADC's Head of Office is bound by a confidentiality agreement in relation to his/her responsibilities under this policy, and ensures that all intelligence received is kept confidential. Any disclosure to other HKADC's staff and officers shall be on a strict need-to-know basis only and any person who receives such information shall maintain its strict confidentiality. Such information is handled securely through the following appropriate means:

- Encrypted / password protected databases
- Locked cabinet

2. Protection of the sources of intelligence

Within HKADC's scope, Head of Office ensures the protection of the sources of intelligence as deemed appropriate. When proceeding with intelligence sharing or dissemination, no identity shall be disclosed without prior consent of the source.

3. Risk of leaks or inadvertent disclosure

In accordance with point 1. above, Head of Office ensures the minimization of the risk of leaks and inadvertent disclosure of intelligence captured. However, should this occur, Head of Office shall promptly evaluate the nature of the leak disclosure, the possible negative consequences, and take remediation measures as appropriate.



4. Shared information

Where intelligence is shared with HKADC by other parties such as health, law enforcement agencies, sports organization, other Anti-Doping Organizations, etc., Head of Office will confirm in writing to such other parties that all intelligence received is processed, used and disclosed according to the procedures set out in points 1, 2 and 3, and only for legitimate anti-doping purposes.

Where intelligence is shared by HKADC with other parties, HKADC will require the same written confirmation from such other parties.

GATHERING, ASSESSMENT AND USE OF ANTI-DOPING INFORMATION (INTELLIGENCE)

1. Information sources and whistleblowers reporting tools

Internal or “closed” sources (where access is restricted): ADAMS, Athlete Passport Management Unit (APMU), other ADOs, laboratories, law enforcement or health agencies, sample collections agencies’ Doping Control Officers (DCO), chaperones, whistleblowers reports (e.g., confidential reporting by Athletes or Athlete Support Personnel), HKADC’s Medical/Anti-Doping officers, Code “Substantial Assistance” provision, etc.

External or “open” sources (publicly available information): Internet, traditional and social media, research and academic publications, sports news and forums, etc.

HKADC’s website specific platform or WADA “Speak Up” platform.

2. Collation and assessment

Head of Office first evaluates the reliability of the source, then assesses the accuracy of the information itself.

3. Processing and outcomes

Taking into account the evaluation and assessment above, and other relevant factors indicating potential risks of doping, such as those identified in the HKADC’s risk assessment, Head of Office determines follow-up action(s) such as:

- i. conducting target testing,
- ii. conducting further investigation on a particular case,
- iii. establishing trends or patterns for reviewing the Test Distribution Plan, and/or,
- iv. creating files to be referred for future investigations.

Where appropriate, sharing information with other parties such as law enforcement or other ADOs with jurisdiction can be considered, with Head of Office ensuring that at least the similar requirements as per point 4 “Shared Information” above are fulfilled by the other party.