



中國香港運動禁藥管制機構
ANTI-DOPING ORGANIZATION OF HONG KONG, CHINA

POLICY FOR GATHERING ANTI-DOPING INTELLIGENCE

ANTI-DOPING ORGANIZATION OF HONG KONG, CHINA

INTRODUCTION AND SCOPE

The policy describes Anti-Doping Organization of Hong Kong, China (“ADOHK”)’s procedures for gathering and assessing information / intelligence in accordance with Article 11 of the International Standard for Testing and Investigations (ISTI).

RESPONSIBILITIES

ADOHK’s Head of Office is responsible for the implementation and follow-up of this policy and its subsequent procedures.

ADOHK’S POLICY FOR HANDLING ANTI-DOPING INTELLIGENCE

1. Security and Confidentiality

- ADOHK’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 ADOHK’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.

2. Storage of information

ADOHK’s Head of Office shall ensure that the collected information and ADOHK’s operational data are handled securely and separately from any other ADOHK’s department or databases, through the following appropriate means:

- Encrypted / password protected databases
- Locked cabinet

3. Protection of the sources of intelligence

Within ADOHK’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.

4. Risk of leaks or inadvertent disclosure

In accordance with point 1 “Security and Confidentiality” 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



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promptly evaluate the nature of the leak disclosure, the possible negative consequences, and take remediation measures as appropriate. ADOHK shall keep a record of the facts relating to the leak or disclosure, its effects and remedial actions taken.

5. Shared information

Where intelligence is shared with ADOHK by other parties such as health agencies, law enforcement agencies, sports organizations, 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 ADOHK with other parties, ADOHK will require the same written confirmation from such other parties.

The ADOHK will use secured communication tools when transferring any confidential information to external 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, WADA, 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), ADOHK’s Medical/Anti-Doping officers, Code “Substantial Assistance” provision, etc.

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

ADOHK’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 ADOHK’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.



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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 5 “Shared Information” above are fulfilled by the other party.