Report of the

INDEPENDENT OBSERVERS

XXII Commonwealth Games Birmingham 2022

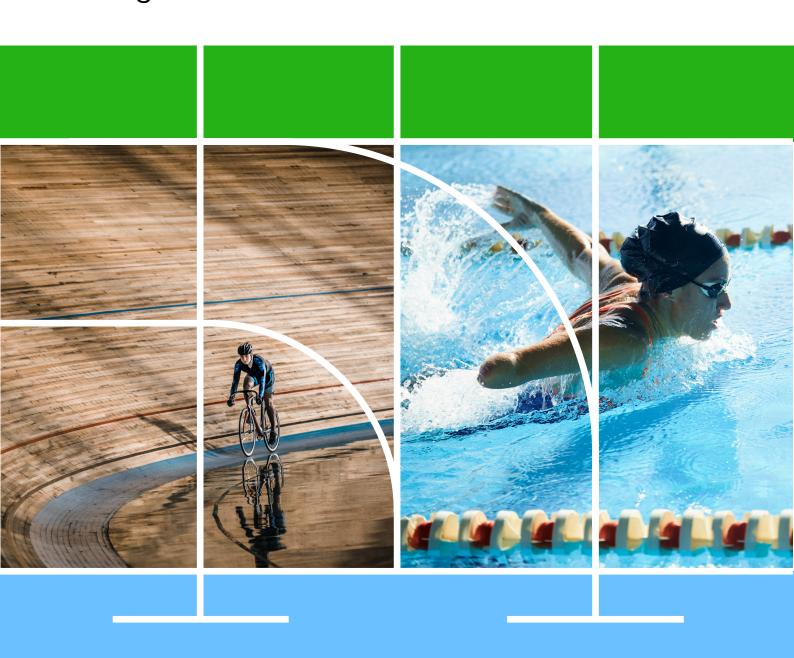






Table of content

1.	Ack	nowledgments	4
2.	Acro	onyms and Abbreviations	5
3.	Exe	cutive Summary	6
	3.1	The Key Players and the Games Plan	6
	3.2	Challenging Times	6
	3.3	Key Pre-Games Initiatives and Intelligence-Led Anti-Doping Program	7
	3.4	Therapeutic Use Exemptions (TUEs)	8
	3.5	Innovation and Technology	8
	3.6	Sample Collection Team and Sample Collection Procedures	8
	3.7	Results Management	8
	3.8	Conclusion	9
4.	Mar	date, Role, Functions of the IO Team	9
	4.1	General Purpose of the IO Program	9
	4.2	The Scope of the BG 2022 IO Mission	9
	4.3	IO Team Composition	10
5.	Birn	ningham 2022 Games Overview and Operating Environment	11
	5.1	CGF Jurisdiction	11
	5.2	Key Players and Operational Approach	12
6.	Pre-	Games Initiatives	13
	6.1	Composition of the Pre-Games Taskforce	14
	6.2	Scope of the Pre-Games Taskforce and Activities Conducted	14
7.	Edu	cation & Athlete Engagement	18
8.	The	rapeutic Use Exemptions	20
9.	Inte	ligence	21
10.	Tec	nnology	22
11.	Tes	Distribution Planning and Delivery	23
	11.1	Test Planning and Implementation	24
	11.2	Athlete Biological Passport (ABP) & Athlete Passport Management Unit (APMU)	25
	11.3	Whereabouts Information	26
12.	San	ple Collection	27
	12.1	Sample Collection Personnel	27
	12.2	Sample Collection Sessions	29



13.	Labo	atory Activities	32	
	13.1	General	32	
	13.2	Reporting Results of Analyses	32	
14.	Resu	Its Management	33	
15.	Ensu	ring Continuity of Improvements to the Next Games	35	
	15.1	The WADA-CGF MOU signed during the BG 2022 Games	36	
	15.2	The Legacy Project launched during the BG 2022 Games	36	
	15.3 Territ	Two tools for a Successful Anti-Doping Program within Commonwealth Nations and ories	36	
APF	PENDIX	(ES	38	
	APPE	ENDIX 1: Collated Commendations and Recommendations	38	
	APPE	NDIX 2: Paperless DCF Operation Diagram	43	
	APPENDIX 3: Testing Data			
	APPENDIX 4: Results Management Data			





1. Acknowledgments

The Commonwealth Games like to be referred to as the 'Friendly Games' and this twenty second edition once again proved no exception. The WADA Independent Observer Team (IO team) acknowledges the warm welcome received on-site and outside the various venues everywhere in the West Midlands and specifically downtown Birmingham, by the dedicated and enthusiastic workforce, including the large number of 'grey and orange' volunteers.

The WADA IO team acknowledges the quality of the planning and doping control activities in Birmingham. The sincere desire to serve the interests of athletes was evident amongst the Commonwealth Games Federation Anti-Doping and Medical Commission (CGF ADMC) and UK Anti-Doping (UKAD), acting as a delegated third party on behalf of the CGF.

The IO team would like to thank, in particular, Ms. Vanessa Hobkirk, member of the CGF ADMC, and her colleagues, including Dr. Peter Harcourt, president of the commission, for their responsiveness and diligence in all areas of the CGF anti-doping program and Mr. Daniel Ashworth, BG 2022 Doping Control Manager from UKAD, and his dedicated team, who worked endless days putting everything together to ensure the effective delivery of the CGF anti-doping program.

The IO team also wishes to acknowledge the very committed volunteers, Doping Control Station Managers (DCSM), Doping Control Officers (DCOs), Blood Collection Officers (BCOs), chaperone team leaders and chaperones, without whom the program could not operate. It goes without saying that special thanks are being conveyed as well to all athletes and their support personnel who demonstrated their commitment to clean sport *via* their cooperation during doping control initiatives.



To everyone, thank you.

Thank you to the incredible people who have contributed to make this special and unique event a success under what remained challenging circumstances due to the COVID-19 never-ending threat. The days we spent together in Birmingham were extraordinary ones.

As CGF President Dame Louise Martin said in her final speech during the closing ceremony, "we will never forget your warmth and welcome". And we will indeed build a better world through sport.

The IO team has felt most privileged to be part of these Games; they were inclusive, diverse, and truly inspiring as a model of where para-sports are fully integrated within the Games.



2. Acronyms and Abbreviations

Full name	Acronym/Abbreviation
Adverse Analytical Finding	AAF
Anti-Doping Administration & Management System	ADAMS
Anti-Doping Administration & Management System Anti-Doping Organization	ADO
Anti-Doping Organization Anti-Doping Rule Violation	ADRV
Athlete Biological Passport	ABP
Athlete Committee	AC
Athlete Committee Athlete Passport Management Unit	APMU
Athletics Integrity Unit	AIU
	ATF
Atypical Finding	BG 2022 Games
(The) Birmingham 2022 Commonwealth Games (The) Birmingham Organising Committee for the 2022 Commonwealth Games Limited	(The) OC
Blood Collection Officer	BCO
Chain of Custody	CoC
Code Compliance Questionnaire	CCQ
Commonwealth Games Association	CGA
Commonwealth Games Federation	CGF
Commonwealth Games Federation Anti-Doping and Medical Commission	CGF ADMC
Commonwealth Games Federation Anti-Doping Rules	CGF ADRs
Court of Arbitration for Sport	CAS
DCO Central	DCOC
Doping Control Command Center	DCCC
Doping Control Form	DCF
Doping Control Officer	DCO
Doping Control Personnel	DCP
Doping Control Station	DCS
Doping Control Station Manager	DCSM
Erythropoietin	EPO
Growth Hormone Releasing Factors	GHRFs
Independent Observer Team	IO team
Intelligence and Investigations	1&1
International Doping Control Officer	IDCO
International Federation	IF
International Standard for Education	ISE
International Standard for Laboratories	ISL
International Standard for Results Management	ISRM
International Standard for Testing and Investigations	ISTI
International Standard for Therapeutic Use Exemptions	ISTUE
International Testing Agency	ITA
Major Event Organization	MEO
Minimum Level of Analysis	MLA
National Anti-Doping Organization	NADO
Regional Anti-Doping Organization	RADO
Results Management Authority	RMA
Sample Collection Personnel	SCP
Test Distribution Plan	TDP
Testing Authority	TA
Testing Document for Sport Specific Analysis	TDSSA
Testing Order	TO
Therapeutic Use Exemption	TUE
Therapeutic Use Exemption Committee	TUEC
UK Anti-Doping	UKAD
World Anti-Doping Agency	WADA
World Anti-Doping Code	Code
wond rata Doping Gode	Codo



3. Executive Summary

In agreement with the CGF, WADA appointed a five-member IO team to attend the 22nd edition of the Commonwealth Games that took place in Birmingham, England from July 28 to August 8, 2022. The Games Period for doping control ran from July 19, i.e., nine days before the opening ceremony, to August 10, i.e., two days after the closing ceremony. While three of the five IO team members were on-site from July 24, active observations of the doping control procedures commenced for out-of-competition (OOC) sample collections on July 26 and in-competition (IC) on July 29. During that time, the IO team visited almost all competition venues, including the Lee Valley Velo Park located in London, as well as the Doping Control Stations (DCS) at the three Athlete Villages located in and around Birmingham.

3.1 The Key Players and the Games Plan

The CGF is the governing body of the Commonwealth Games and, as a signatory to the Word Anti-Doping Code (the Code), adopted anti-doping rules that were in force during the Commonwealth Games. While the CGF, as the signatory to the Code, remained responsible from a Code compliance perspective for all aspects of doping control conducted at the Games, the CGF had agreed to partially delegate, through an agreement between the Birmingham Organising Committee for the 2022 Commonwealth Games Limited (OC) and the local National Anti-Doping Organization (NADO), namely UKAD, the management of its anti-doping program. In Birmingham, UKAD had responsibility for the development, implementation, and management of the education and testing component of the anti-doping program (including, with respect to testing, the recruitment of most of the Sample Collection Personnel (SCP), the sample collection procedures, as well as the transport of samples collected during the Games Period to the WADA-accredited laboratory, the 'Drug Control Centre – King's College London' (hereafter referred to as the 'London Laboratory')). While a few aspects of doping control had been assigned to the OC (such as the recruitment of the chaperones and, in collaboration with UKAD, their training as well), the CGF ADMC had overall responsibility for Therapeutic Use Exemptions (TUE) and results management.

3.2 Challenging Times

Like most multi-sport games, the Birmingham 2022 Commonwealth Games (BG 2022 Games) presented some unique challenges. In addition, and as it has been the case these past 12-24 months for most of the major event organizers, the COVID-19 pandemic and the restrictions implemented to mitigate its impact – when one could have reasonably hoped that these Games would be spared – created an even more demanding environment for the OC and for the CGF ADMC in particular. The CGF ADMC which was not only in charge of anti-doping, also had major responsibilities in COVID-19 related protocols and follow-ups. Although the restrictions were not as difficult or restrictive as the last two recent Olympic Games (i.e., in Tokyo in the Summer of 2021 and in Beijing in the Winter of 2022), the situation remained challenging to manage, with infections reported during the Games from participants, athletes and their support personnel as well as volunteers. However, no major impact was noticed on any of the anti-doping activities conducted at the Games. In this regard, the CGF ADMC, UKAD and the OC demonstrated their readiness and flexibility to face these challenging circumstances.

In addition, and during the Games, the United Kingdom faced major national railway strike movements directly impacting the transport of the BG 2022 Games workforce, including Doping Control Personnel (DCP), going to the different venues. Once again, here, with a bit of anticipation and adaptation, everyone was pragmatic in dealing with this situation.



3.3 Key Pre-Games Initiatives and Intelligence-Led Anti-Doping Program

The CGF, in collaboration with UKAD, successfully co-chaired a Pre-Games Taskforce that delivered several key initiatives prior to and during the Games, to protect every athlete's right to compete on a level playing field and to preserve the integrity of the event.

The International Standard for Education (ISE) highlights that an athlete's first experience with anti-doping should be through education rather than through the doping control process. With that in mind, the Pre-Games Taskforce developed and implemented several education and awareness initiatives ahead of the Games to target and inform the BG 2022 Games participants. These were mainly through the ADEL interactive education course for athletes and coaches intending to participate in the Games, which were developed in collaboration with WADA. The level of education displayed by athletes and athlete support personnel during the Games was no doubt also a result of the education programs implemented by the 20 International Federations (IFs) (including 15 Summer Olympic IFs, 4 non-Olympic IFs, and the IPC acting as an IF for three sports), NADOs and Regional Anti-Doping Organizations (RADOs) of the 72 Commonwealth nations and territories that competed.

An intelligence-led approach was also evident in the testing program implemented for the Games. The Pre-Games Taskforce, established in the lead-up of the BG 2022 Games, conducted an extensive Risk Assessment which led to 1,800 testing recommendations issued during the Spring of 2022 to various Anti-Doping Organizations (ADOs), including IFs and NADOs.

The Taskforce's mission was to ensure that athletes were tested sufficiently in advance and leading up to the Games to minimize (and hopefully avoid) Adverse Analytical Findings (AAFs) during the actual event, which not only tarnishes the event and the country the athlete represents but also prevents another athlete from participating in that athlete's place.

In addition to the above, the further analysis strategy put in place by the Taskforce resulted in the further analysis of 51 samples from the previous 2018 Commonwealth Games. All results were negative.

The Games-time Test Distribution Plan (TDP) was designed following a thorough and well-considered Risk Assessment which was developed in collaboration with several external experts. The decisions on how and why to allocate tests by sport, by discipline, by country and by athlete were informed and underpinned by a strong rationale. The TDP called for 1,000 tests 1 to be conducted, including 450 OOC tests, 300 IC tests and, in addition, 150 as a contingency. The other 100 tests had been assigned to the Pre-Games Taskforce to conduct target testing in advance of the CGF jurisdiction commencing, which meant that the OC funded the tests, but another ADO (IF or NADO) would act as Testing Authority and Results Management Authority.

It must be highlighted that close to 60 percent of those 1,000 tests were conducted out-of-competition. The Games-time target tests were facilitated thanks to a seamless transition between the work of the Pre-Games Taskforce and the hand over to the Games-time group (i.e., UKAD).

-

¹ A test is defined as any attempt to test a single athlete in a single Sample Collection Session. If multiple samples (blood and/or urine) are collected from an athlete in a single Sample Collection Session, this is only counted as one test.



3.4 Therapeutic Use Exemptions (TUEs)

From a TUE perspective, the focus was on ensuring the ease of the process for athletes and their physicians as well as the availability of information regarding this aspect. The responsiveness of the CGF TUE Committee (TUEC) was seen as a positive point for future Games, although the TUEC should be reminded of the importance of reporting promptly all the necessary information into the Anti-Doping Administration & Management System (ADAMS).

3.5 Innovation and Technology

While ADAMS is the central and key anti-doping technology tool used by ADOs, a couple of innovative paperless technological tools were utilized during the BG 2022 Games. The first one is the paperless Chain of Custody (CoC) developed by UKAD and successfully implemented for the first time in Birmingham. The second one is DCO Central² which, for the first time as well, was used in-competition during a multi-sport major event (through successful synchronization with ADAMS).

3.6 Sample Collection Team and Sample Collection Procedures

The doping control team in place at the BG 2022 Games not only showed dedication, motivation and enthusiasm, but also a high level of competence. The IO team was impressed by the number of sample collection personnel available at each testing venue as well as by the organization of each team and each individual involved in the sample collection process, which undoubtedly was the result of a robust recruitment and great training plan developed and implemented by UKAD, and the OC for chaperones. The IO team would also like to commend the chaperone team leaders for the way they trained and supervised the chaperones on-site, ensuring successful missions.

Regarding the DCS, while the IO team noted that they were always appropriately staffed, well managed and that most were fit for purpose, all of them would have benefited from better directional signage, and, for some, from more adequate temporary toilets, as outlined later in this report. Overall, the sample collection process implemented during the Games was very good. Any minor issues that were identified by the IO team and raised during daily or every-two-day meetings with the CGF ADMC were most often promptly addressed and corrected. The lack of signage issue, occasionally making access to DCS difficult for SCP and ASP (including athlete representatives), could unfortunately never be fully addressed until the end of the Games.

3.7 Results Management

The CGF handled results management administration for potential Anti-Doping Rule Violations (ADRVs) 'in-house' for most of the process, delegating its hearings and hearing decisions responsibilities to <u>Sport Resolutions</u>, a UK-based organization describing itself as an independent, not-for-profit, dispute resolution service for sport operating globally, offering arbitration, mediation, tribunal and expert opinion. The CGF managed, in a prompt manner, one Atypical Finding (ATF), four AAFs and two possible non-analytical cases. It must be noted that no hearing took place during the Games Period, which is likely due to the 10-day delay offered

² DCO Central is the World Anti-Doping Agency's doping control application. DCO Central provides Sample Collection Agencies and DCOs with an online and offline solution for secure and fast doping control data processing. DCO Central leverages ADAMS to pre-populate the Doping Control Form with planned test and athlete profile information. All data is uploaded back to ADAMS, which reduces manual data entry and improves data integrity and accuracy.



to athletes, in case of an AAF, to request a B-sample analysis and provide explanations. In this respect, the IO team recommends reducing such delays and including timeframes for results management cases directly in the CGF Anti-Doping Rules (CGF ADRs). The legal aid mechanism which was available to all BG 2022 athletes to provide support if and where needed during the results management process is to be commended.

3.8 Conclusion

In conclusion, while the IO report offers recommendations throughout for consideration by the CGF and different stakeholders for future editions of the Commonwealth Games, the IO team congratulates the CGF, UKAD and all other stakeholders who contributed to the success of the anti-doping program implemented for the BG 2022 Games and which undoubtedly contributed to protecting the integrity of the Games. Other major sporting events would do well to learn from the Commonwealth Games anti-doping program's strengths and ways of improvements identified in the report. The IO team is confident that both the Legacy Project and the WADA-CGF Memorandum of Understanding (MOU) respectively launched and signed during the BG 2022 Games will offer excellent opportunities to strengthen the anti-doping program and strategy of the CGF and within the Commonwealth nations and territories.

4. Mandate, Role, Functions of the IO Team

In May 2022, the CGF signed an agreement with WADA, authorizing and approving the presence of independent observers (IO) mandated by WADA during all the stages of the doping control procedures at the 2022 Commonwealth Games in Birmingham, England.

4.1 General Purpose of the IO Program

Originally launched at the 2000 Olympic Games in Sydney, the IO program was established to enhance athletes and public confidence at major sporting events by monitoring and reporting on all phases of the doping control and results management processes in an objective manner. Over time, the IO program has evolved to meet the needs and demands of organizations responsible for delivering major events such as the CGF. For this edition of the Commonwealth Games, as for the previous one, the primary objective of the IO program in Birmingham was to support the CGF in implementing an effective anti-doping program in compliance with both the Code and its applicable International Standards.

The IO team, through its observations, assessed whether procedures were in line with the Code and relevant International Standards and provided onsite advice and recommendations to the relevant organizations involved in the delivery of the doping control program.

4.2 The Scope of the BG 2022 IO Mission

All aspects of doping control were part of the scope of observation of the IO team, in particular:

- Test distribution planning;
- Provision of athlete whereabouts;
- Training of sample collection personnel;
- Implementation of the OOC and IC testing program;
- TUE procedures;
- Athlete notification and sample collection procedures:



- Transport and chain of custody of samples;
- · Results management process including hearings; and
- Any other relevant areas under the 2021 WADA Code, International Standards or Technical Documents.

It should be noted that no IO team member was present to observe the London Laboratory operations during the Games.

The main observation period was from the date of the opening ceremony of the Games, namely July 28, 2022, until and including the day of the closing ceremony, namely August 8, 2022. However, three IO members began their observations three days prior to the opening ceremony on July 25, 2022.

4.3 IO Team Composition

The IO team had the requisite skills and experience to observe and comment upon activities within the scope of observation and, as part of WADA's commitment to athlete engagement, also included a greatly experienced former athlete.

The IO team consisted of:

- Michal Rynkowski, PhD (Poland), Director, Polish Anti-Doping Agency (Chair);
- Léa Réguer-Petit, PhD (France), Manager, Sport Movement Relations, WADA (Vice-Chair);
- Chaya Ndiaye (Canada/Senegal), Head of Product, IT, Data and Digital Development, WADA:
- Samuel Quinche (Switzerland), Deputy
 Director General and Director of Testing and
 Investigations, Swiss Sport Integrity
 Foundation; and
- Aliann Pompey (Guyana), Chair of the Panam Sports Athletes' Commission and Olympic 400m runner.



Recommendation

• **CGF**: While several documents (including a draft Risk Assessment, a draft Test Distribution Plan, the Education Strategy, the Policy for Long-Term Storage) in relation to the anti-doping program of the BG 2022 Games had been provided to WADA during the pre-event WADA Compliance monitoring process (i.e., through the Code Compliance Questionnaire (CCQ)), the IO team recommends that the CGF does share these documents, if updated, as well as internal TUE, results management and testing processes and policies with the IO team sufficiently in advance of the event (i.e., at least a month before the opening ceremony, as per the IO agreement). The IO team requested, on a few occasions, to receive updated documents, however, only a few were provided before the Games started, despite several others which could have also been provided. On-site reception of key documents is likely to delay any input on these by the IO team. (*R1*)



5. Birmingham 2022 Games Overview and Operating Environment

Held every four years, with a hiatus during World War II, the Games have grown from featuring, in 1930, eleven countries and 400 athletes, to a global spectacle in 2022 consisting of nineteen sports along with eight fully integrated para-sports, with around 4,900 athletes attending from 72 Commonwealth Games Associations (CGAs)³. It must be appreciated that many of those CGAs are found in very small nations with limited access to anti-doping programs that may be the norm elsewhere.

The BG 2022 Games took place from July 28 to August 8, 2022, in and around Birmingham in the West Midlands, England, United Kingdom. Underpinned by the core values of humanity, equality and destiny, the event is renowned for inspiring athletes to compete in the spirit of friendship and fair play.

The BG 2022 Games in a few key numbers

- Athletes and team officials: 6,900; ~4,900 being athletes
- 19 sports, 8 para-sports
- 11 days of sport, ~ 280 different medal events (the first time in history that a major multi-sport event featured more women than men medal events)
- 15 venues, 14 being in the West Midlands
- 3 main athlete villages Birmingham, Warwick, NEC, and 1 other minor one in London (for track cyclists)
- 94 Games records and 3 World records broken

5.1 CGF Jurisdiction

As per the <u>CGF ADRs applicable to the 2022 Commonwealth Games</u>, the CGF had authority during the Games Period, i.e., from the opening of the Athletes' Village, namely July 19, 2022, i.e., 9 days before the opening ceremony, up until and including the day of the closing of the Athletes' Village, namely August 10, 2022, i.e., two days after the closing ceremony, to conduct IC and/or OOC testing of athletes who were entered to participate in the 2022 Commonwealth Games.

Recommendation

CGF: It is recommended that the CGF considers extending its jurisdiction one or two-months before the
Games as other MEOs have started to do recently, to conduct out-of-competition and in-competition
testing on any athlete entered to, or who may be entered to, participate in the Games. This additional
time of testing jurisdiction would allow the CGF, or a delegated third party such as the local NADO, on
behalf of the CGF, to coordinate tests on athletes who may not have been sufficiently tested in the lead
up to the Games, prior to their arrival on-site. (R2)

³ CGAs are national sports council of the Commonwealth Sports movement. Each association is responsible for organizing, supporting and overseeing their national team for both the Commonwealth Games and the Commonwealth Youth Games. The associations are subject to the rules of, and report to, the CGF.



5.2 Key Players and Operational Approach

The CGF is the governing body of the Commonwealth Games and, as a MEO signatory to the Code, adopted the Rules that were in force during the Birmingham Commonwealth Games.

As provided under the anti-doping program of the BG 2022 Commonwealth Games, the CGF ADMC, comprising of experienced and committed physicians, a few lawyers as well as more operational people from various Commonwealth countries, was responsible for overseeing the anti-doping services required for the Games and ensuring that procedures were Code compliant and of the highest standards. In addition, the CGF ADMC role was to also ensure the health and safety of all Games participants.

While the CGF, as the signatory to the Code, remained responsible from a Code compliance perspective for all aspects of doping control conducted at the Games, the CGF had agreed to partially delegate the management of its anti-doping program to the local NADO, namely UKAD, engaged by the OC. It was agreed that UKAD would oversee the implementation and delivery of the BG 2022 Games doping control program, under the authority of the CGF, in accordance with instructions received from the CGF and the provisions of the Code, its International Standards and the CGF anti-doping standard.

In Birmingham, UKAD had overall responsibility for the development, implementation, and management of the education and testing anti-doping programs. UKAD's role included:

- The planning, delivery and management of all services associated with sample collection and analysis;
- The development a project plan, for pre-event education services, doping control workforce plan, Taskforce testing program, sample collection and analysis at the opening of the Games village;
- The sharing of intelligence on a 'need to know' basis with the Taskforce or such other relevant party;
- Assistance with the development of BG 2022 anti-doping documentation including: TDP, Risk Assessment, CGF ADRs, Doping Control Handbook, policies and procedures, athlete education resources and content contained within other Pre-Games key documents;
- The development of a whereabouts plan and system for the Games;
- Technical and specialist advice and support in the resolution of issues associated with the Birmingham 2022 Anti-Doping Program, including support in the planning of appropriate doping control stations; and
- The identification and provision of key personnel to support the management of the project throughout its duration.

UKAD's task was therefore quite broad, and it was clear that the CGF was very reliant on UKAD for everything related to education and testing activities. The CGF, however, had sole and exclusive TUE and results management responsibility.

The anti-doping workforce included 111 DCP, supported by twelve UKAD office staff and over 150 volunteers who fulfilled the role of chaperone. Among these 111 DCP, there were 24 DCSM, 50 DCOs, twelve BCOs, 24 chaperones team leaders, one doping control manager, one project manager, three venue cluster managers, six doping control assistants and one investigator. 23 international DCOs joined the 88 UKAD DCP. DCP from seventeen countries worked at the Games including England, Wales, Scotland, Northern Ireland, Ireland, South Africa, Botswana, Barbados, Tanzania, Sri Lanka, Canada, Kenya, Aruba, Zambia, Uganda, New Zealand, Lesotho which made the workforce a very international one.

UKAD's team turned out to be, together with the support of the CGF ADMC, the operational nucleus of the doping control activities. While UKAD and the CGF ADMC had developed a good working relationship and trust, despite several meetings with the OC ahead of the Games and during the Games, the IO team noted limited action or



delivery on the part of the OC, sometimes causing delays in resolving typical last-minute matters or unexpected challenges on-site. This fortunately did not impact the overall quality of the anti-doping program delivery during the Games.

The IO team observed a very strong and dedicated team of experienced individuals from UKAD and a devoted CGF ADMC (although also very busy with COVID-related issues), who came together and collectively developed and delivered an anti-doping program of high quality.

Commendation

CGF/UKAD: The international touch and the diversity of the various people involved in the anti-doping program of the BG 2022 Games, not only within the CGF ADMC but also within the anti-doping workforce itself, undoubtedly contributed to the success of these Games as well as future anti-doping programs. This is to be commended, not only in that it allows the sharing of experiences and skills of each person involved, but it also contributes to improving capacity building and raises everyone's knowledge. (C1)

Recommendation

• **CGF/OC:** It is recommended that the CGF reflects on any mechanisms or procedures it can put in place for future Games to ensure that the local organizing committee can react promptly to issues raised during the Games. This might be by ensuring staff with the appropriate level of authority are dedicated to anti-doping during the Games and committed to quick problem solving. (*R3*)

6. Pre-Games Initiatives⁴

As per the 2018 Commonwealth Games, a Taskforce was established to ensure there was a robust anti-doping program in place for the BG 2022 Games in particular during the Pre-Games phase and to give public confidence in clean sport. It was built on the <u>High Integrity Anti-Doping Partnership</u> that was put in place for the Gold Coast 2018 Commonwealth Games, utilizing multi-stakeholder expertise to prioritize the rights of clean athletes and ensure a zero-tolerance approach to doping. The Taskforce was first <u>announced on UKAD's website on 25 February 2022</u>, i.e., a little more than six months before the opening ceremony.

The BG 2022 Pre-Games initiatives in a few key numbers

- 1,126 athletes, 287 coaches and 127 medical professionals completed the 'ADEL for Birmingham 2022 Commonwealth Games (athletes and coaches)' course.
- 1,820 testing recommendations were issued to ADOs ahead of the Games for International Federations and Commonwealth NADOs to consider and implement.
- 79 tests were fully funded by the CGF before the Games Period.

⁴ Most of the data originates from discussions with UKAD and the CGF, before, during and after the Games, as well as from a Debrief Report of the '2022 Commonwealth Games Pre-Games Anti-Doping Taskforce' which UKAD and the CGF have kindly shared with the IO team after the Games.



6.1 Composition of the Pre-Games Taskforce

The Taskforce was co-chaired by CGF Medical Advisor, Dr. Peter Harcourt and Taskforce Manager from UKAD, Mr. Pat Hartley. UKAD also acted as the Secretariat for the Taskforce. It included 24 members from ten anti-doping organizations, among which:

- one MEO: CGF;
- six NADOs: UKAD, Sport Integrity Australia (SIA), the Canadian Centre for Ethics in Sport (CCES), Drug
 Free Sport New Zealand (DFSNZ), the Anti-Doping Agency of Kenya (ADAK), and the South-African
 Institute for Drug-free Sport (SAIDS);
- one RADO: the Caribbean Regional Anti-Doping Organization (CARRADO); and
- two International Federations: Athletics Integrity Unit (AIU) from World Athletics, and World Rugby.

This diverse group was extremely beneficial to share information and intelligence to coordinate testing recommendations to both IFs and Commonwealth NADOs for their consideration in order to optimize Pre-Games testing efforts. Furthermore, the Taskforce's coordination and information gathering fed into the dynamic BG 2022 TDP.

While not members of the Taskforce, it must be noted that the OC and WADA also provided support to the Taskforce.

6.2 Scope of the Pre-Games Taskforce and Activities Conducted

The Taskforce was involved in testing and intelligence activities, but also and for the first time, in education initiatives.

6.2.1 Education Initiatives

A summary of the BG 2022 Pre-Games initiatives related to education is provided below:

- E-learning Courses: The Pre-Games Taskforce worked in collaboration with WADA to develop an interactive education course for athletes and coaches intending to participate in the 2022 Commonwealth Games 'ADEL for Birmingham 2022 Commonwealth Games (athletes and coaches)'. This course, released on 28 April 2022, provided important information regarding the BG 2022 Commonwealth Games anti-doping rules, procedures, and requirements. It was available in English and 1,485 people (among which 1,126 athletes, 287 coaches and 127 Medical Professionals) successfully completed the course. In addition to this number, 278 users started the course and 31 registered but did not start the course. 60% out of the 1,794 users represented five countries (India 31%, South Africa 9%, Fiji 7%, Nigeria 7%, Pakistan 5%), the other 40% involved users from 45 different Commonwealth countries or territories. This course was not a mandatory requirement for any participant.
- OC Newsletters: In the months leading up to the BG 2022, the Taskforce included critical information in the BG 2022 newsletters. For three successive months, from April to June, CGAs received, through a dedicated online platform of the OC, anti-doping related information, e.g., anti-doping rules for the Games, invitation to familiarize themselves with the WADA Code and Prohibited List (including the changes to the rules for glucocorticoids), information on the definition of in-competition, the TUE application forms and process as well as on the E-learning course cited above.



- **UKAD Website:** UKAD had a <u>dedicated section for the BG 2022 Games</u> where various information could be found.
- **CGF Website:** CGF had a <u>dedicated webpage for anti-doping</u>, which continued to be updated up until the Games (see further development about this website in section 7 of the report).

6.2.2 Testing Initiatives

A summary of the BG 2022 Pre-Games initiatives related to testing is provided below:

Issuance of Recommendations

The Taskforce's role was to coordinate efforts between the relevant IFs, with a special focus on the highest-risk sports and disciplines for doping for the Commonwealth Games, as well as the NADOs and RADOs to ensure broad representation from several Commonwealth countries.

Between March and April 2022, the Taskforce developed guidelines for issuing testing recommendations through a discipline-by-discipline qualitative and quantitative assessment of the minimum testing requirements. A first batch of recommendations were issued on April 28 for the highest-risk sports and disciplines. Three weeks later, a second batch of recommendations were issued for the remaining sports and disciplines. Additional guidance was provided a week later for team sports, which, given the size of squads and uncertainty relating to selections, consisted in recommendations to test a proportion of final squads.

A total of 1,820 testing recommendations were issued to IFs and NADOs by the Taskforce. Of that total, 1,076 were fully implemented; 116 were partially implemented, i.e., where the ADO committed to completing one of the two recommended Pre-Games tests; 70 were not implemented; 99 were left without a response; and 459 (i.e., 25%) were flagged by the relevant ADO that the athlete would not be selected for the Games.

Where a response was received and an athlete was anticipated to compete at the Games, 94% of recommendations were fully or partially implemented (1,192 of 1,262); this percentage represents two thirds of the total number of recommendations issued. By way of comparison, 1,100 testing recommendations had been made by the 2018 Gold Coast Pre-Games Taskforce and 62% of the athletes were subsequently participants in Gold Coast. The 2018 recommendations resulted in 633 tests being undertaken on future participants. The IO team notes a significant increase in the number of recommendations issued as well as a better ratio of athletes tested ahead of the BG 2022 Games compared to 2018, highlighting lessons learned from Games to Games as well as an increased participation and collaboration from ADOs.

Comparison between 2018 & 2022 Pre-Games Taskforce Recommendations 2018 2022 1,820 1,100 Total number of recommendations issued +65% +88% Number of recommendations fully or partially implemented on future participants 633 1,192 (= more than 1/2 of the total number (= 2/3rd of the total number of of recommendations issued) recommendations issued)



Testing Funded by the OC

Through its agreement with the OC, an estimated 80-120 Pre-Games tests had been secured to be conducted prior to the opening of the Athlete Village and which were outside the testing authority of the CGF. This funding was possible through a slight reduction in the scale of Games-time testing, but reflective of the heightened doping risk prior to the Games. Such testing was paid for by the OC, directed by the CGF, but conducted by ADOs under their Testing Authority. This testing focused on building RADO capacity, intelligence-led testing, supplementing testing recommendations, and targeting Pre-Games training camps in the United Kingdom. Access to training camps turned out to be difficult due to the lack of reliable information provided by CGAs and OC sports managers, and due to the lack of access to whereabouts information for Games-bound athletes. The Taskforce also faced other obstacles preventing tests to be conducted, sometimes due to COVID-19 restrictions or geopolitical issues. The Taskforce, however, successfully collaborated with stakeholders such as the International Testing Agency (ITA) and the AIU to coordinate quite a significant number of these OC-funded tests.

In the end, 58 sample collections were successfully completed (out of 79 attempts as 21 were unsuccessful). Given the significant delays in confirming test outcomes and costs, the unspent budget from the Taskforce testing could not be deployed at Games-time which was unfortunate. However, the information about the 21 unsuccessful attempts was transferred to the Games-time testing team for consideration.

Overall Pre-Games Testing

Although difficult to directly attribute to the Taskforce itself, out of the approximate 4,900 athletes that participated in the Games, 2,228 were tested at least once between April 2022 and the start of the Commonwealth Games (i.e., 45% of athletes). Considering that some Commonwealth Games sports can be considered low risk for doping and would not therefore be expected to receive a significant number of tests, these figures represent an achievement indicative of well informed, and coordinated testing.

Among the samples collected from prospective BG 2022 athletes by the different ADOs during the Pre-Games Period, three were reported as AAFs during the Games Period. The excellent collaboration between the ADOs involved resulted in the instant removal of the athletes concerned, where necessary. It is, however, regrettable that these samples could not be reported prior to the Games, which would have required a closer follow-up by the concerned Testing Authorities (TAs) with the applicable WADA-accredited laboratories, to ensure earlier reporting of the results. It would have also allowed for another athlete to participate.

6.2.3 Pre-Games Gathering of Intelligence

In the sphere of intelligence, the Taskforce aligned with and supported UKAD's Intelligence and Investigations (I&I) Strategy for the Games, with a specific focus on supporting pre-competition testing plans. The Taskforce reached out to WADA's I&I team in February 2022 to outline its role and encourage the sharing of intelligence in view of the Pre-Games recommendations that were to be issued. There were also various exchanges with ADOs or partners such as the ITA to gather or share information when relevant.

6.2.4 Further Analysis of Samples

The Taskforce identified 51 samples from the Gold Coast 2018 Commonwealth Games that were in long term storage for further analysis. The WADA-accredited Australian Sports Drug Testing Laboratory confirmed that, since the 2018 Games, there had been improvements to their screening for S1.1 Anabolic Agents. Therefore, the further analysis focused on strength and power sports, along with samples that were suitable candidates for additional analysis (i.e., Growth Hormone Releasing Factors (GHRFs), Erythropoietin (EPOs)) that was not conducted in 2018.



The samples selected corresponded to 'active' athletes (that were potential BG 2022 athletes) and medalists from the 2018 Games. The Australian NADO, namely Sport Integrity Australia, selected additional samples for further analysis that related to Australian athletes who competed at the 2018 Games. All results of the further analysis were negative.

Commendations

CGF:

The Taskforce concept within the CGF is now well advanced and its partners (NADOs and IFs) must be made aware that their contributions in sharing test plans and outcomes contributed to making the CGF testing program a success. A Taskforce initiative of this magnitude (not limited to testing initiatives) was a first for the CGF and it is commendable that the Taskforce also included the activities of the education program. (C2)

CGF/Taskforce:

- The Taskforce and its members should be congratulated for the significant efforts made which contributed to sending a strong message to prospective athletes that the CGF and UKAD were committed to protecting the integrity of the Games by maximizing the chances of detecting and deterring doping amongst prospective Games participants. (C3)
- The high level of collaboration between ADOs as well as with other stakeholders is to be highlighted. The important and necessary follow-up conducted by the Taskforce to ensure as much consistency and continuity as possible, as well as an efficient transfer of knowledge and intelligence from the Pre-Games Taskforce to the Games-time team must also be noted. (C4)
- The IO team commends the CGF and its pre-games Taskforce for conducting tests in advance of the CGF jurisdiction starting, i.e., before the opening of the village in collaboration with the respective IFs and NADOs, and encourages the CGF to continue as this will assist in increasing the unpredictability of the program with a focus on those higher risk sports and athletes that have a limited testing history during the crucial preparation phase for the Games. (C5)

Recommendations

CGF/Taskforce:

- As mentioned in the previous IO report, future Taskforce initiatives would be well advised to begin their work as far as twelve months prior to the Games in order to maximize success, especially with respect to the testing recommendations (it is indeed recommended to issue recommendations for high-risk sports with sufficient time prior to future Games, to allow them to be incorporated into ADOs' test planning cycles). The public announcement of the Taskforce should also be made as early as possible to support engagement with other ADOs. The CGF is strongly encouraged to take the necessary actions to make such multi-disciplinary Taskforce become a permanent and robust fixture of future editions of the Games and can begin their work as close as possible to twelve months prior the Games beginning. (R4)
- As far as education is concerned, it is suggested to explore the opportunity of requiring the completion of Pre-Games anti-doping education courses for all participants (i.e., athletes, athlete support personnel, etc.) and to consider developing an online registration platform for all participants who would each have to upload a valid anti-doping training course certificate (i.e., specifying the period of validity and by whom this certificate would need to be issued to be accepted, e.g., WADA, the CGF, an IF or a NADO). (R5)



- As far as testing initiatives and intelligence gathering are concerned, it is recommended to consider thinking about setting up a system to allow access to long lists of potential participants in the Games sufficiently well in advance of the Games. (R6)
- While the CGF funded several tests ahead of the Games, since it was not the Testing Authority, the CGF was not notified of laboratory results. As such, the CGF and future Taskforces are invited, as WADA did in a Pre-Games communication sent to all ADOs, to promptly and diligently remind all concerned ADOs, particularly as the beginning of the Games approaches, to follow-up with the relevant WADA-accredited laboratories if results for prospective athletes (and/or participating athletes) have not been reported or the agreed reporting date with the laboratory has passed. It is also recommended, especially should testing occur very close to the beginning of the Games, to remind ADOs of the possibility to request from the relevant laboratory a quick turn-around analysis and/or indicate to the laboratory that a particular sample is a 'priority' sample for analysis and agree on a date as to when that sample should be reported (please, also see in this respect WADA's Checklist 'Testing of Athletes and Major Events' published by WADA in the Code Implementation Support Program (CISP) on ADEL). (R7)

7. Education & Athlete Engagement

In the <u>ISE</u>, WADA highlights that an athlete's first experience with anti-doping should be through education rather than through the doping control process.

In addition to the Pre-Games initiatives (see section 6 above), other education initiatives were developed and implemented during the Games as part of ensuring the ISE principles were upheld.

Through it all, UKAD was led by its BG 2022 Education Plan which appeared to be a comprehensive and robust plan appropriate for the Games as it acknowledged the role of an MEO and focused on education to potential participants before the event and then targeted education activities for those who participated at the Games which are outlined in more detail below.

The Education Strategy was ambitious. While several initiatives were developed and delivered, others were never developed or were not utilized, prior to or during the event (e.g., live/recorded education sessions focusing on clean Games, WADA doping control leaflet, training camp education, short webinars on key topics, pharmacy information). An evaluation should identify the reasons why some initiatives were possible to continue to innovate for future Games.

A summary of the BG 2022 Games education initiatives is provided below and was limited to the Games Period:

• Athlete Engagement⁵ and Outreach

Athlete engagement includes listening and building stronger athlete relationships worldwide. At major events, engagement and outreach are extremely important activities to support raising awareness about anti-doping and promoting clean sport, while also building greater credibility and trust in the anti-doping system. The program involves athlete committee members, ambassadors for clean sport and other athlete commissions/athlete leaders to be the 'face' of the program at each event.

Page 18/47

⁵ It must be noted that the WADA Athlete Engagement program is separated from any ADO's education initiative. It is not a tool aiming at educating athletes as per the <u>ISE</u>. The Athlete Engagement Program can therefore not fall within the scope of any Compliance Monitoring by WADA.



The Program at the BG 2022 Games started during the preliminary event phase on July 26 and concluded four days later.

It brought a unique opportunity to join forces with the CGF Athlete Committee (AC), UKAD AC, Birmingham AC and WADA AC to showcase collaboration and partnership in bringing together the 'athlete voices' around clean sport and other integrity issues. Additionally, WADA's President Witold Bańka, also being a past athlete, spent some time at the outreach booth engaging the athletes and answering questions.





When the WADA Athlete Engagement team was there, the village set-up focused on the Birmingham University with an outreach booth located outside the dining Hall. This was the most populous village with the dining hall centrally located and high foot-traffic.

Athletes were able to complete a short quiz on anti-doping, win prizes and take photos to commemorate their experiences at the Games using various social media props.

It was then agreed with UKAD, that the booth would be handed over to them on 30 July, taking on the majority of the Athlete Engagement outreach work for a few additional days, converting the WADA booth into an event-based ADO's activity. Although the IO team was not able to observe this, UKAD confirmed having set up an outreach booth in two other villages on two different days.

Media - B22 and 100Me UKAD App, UKAD and CWG Websites, & Athlete Welcome Guide

Athletes were provided with information regarding their expected roles as it pertains to anti-doping. They could access information on different Apps or websites (the BG 2022 dedicated pages on UKAD's website, the anti-doping dedicated page on CGF's website, B22 and 100Me UKAD Apps). The CGF's website included all the information required under Code Article 18.2 but was found to be busy and therefore somewhat difficult for the user to access the desired information.

DCS Screens

The waiting area of most DCS was equipped with at least one small TV screen displaying a <u>short cartoon</u> about the doping control procedure (used with kind permission from the Japanese Anti-Doping Agency [JADA]) as well as, although less visible, QR codes linking to resources such as the Global DRO and information on how to report doping. One of the advantages was that, as a silent video, there was no concern regarding language obstacles or noisy environment as the video, without sound and limited subtitles, was self-explanatory. It was however unfortunate that only a few athletes and ASP actually watched the video on these screens, with generally no SCP raising their attention to the useful content displayed. In some DCS, the TV screen was sometimes either missing or unplugged.

It must be noted that the use of paperless initiatives was aimed at increasing athlete engagement while minimizing the environmental impact.



Commendation

• **CGF**: It is noted that for a MEO to work in partnership with an established NADO like UKAD to deliver the education program is a great way to leverage expertise, as well as local knowledge. *(C6)*

Recommendations

CGF:

- Despite the rather high number of athlete villages at the BG 2022 Games, it is recommended, for future Games, to consider extending event-based education activities to all residential villages (with a minimum of one day in each of them). If event-based education activities take place in one specific location only, it is recommended to consider the options available to promote these activities through athletes and ASP (e.g., giving athletes the opportunity to fill out an online quiz/survey before inviting them to come and visit the booth to pick up prizes so expand the reach of the engagement). (R8)
- While all the information required under Code Article 18.2 was available on the CGF website, the CGF is invited to structure its anti-doping section differently, not only to make it more user-friendly and easier to navigate for athletes and ASP but also to make it more accessible and to facilitate the search for information. (R9)
- It is recommended to use the DCS to promote even more actively and inform about various anti-doping tips (e.g., supplements) through various tools such as sustainable/eco-friendly posters and banners, QR codes, etc. (R10)
- As far as objectives and monitoring of the Education Strategy are concerned, it is recommended
 that the CGF ensures it reviews the activities implemented in order to incorporate lessons learned
 and its assessment of the strategy/objectives to best prepare for the next events. (R11)

8. Therapeutic Use Exemptions

During the BG 2022 Games, TUE management⁶ was the responsibility of the CGF ADMC with Dr. Andrew Pipe (Canada), as the TUEC Chair. The CGF TUE Committee also included four other experienced physicians with various backgrounds, namely Dr. Bruce Hamilton, (New Zealand), Dr. Aya Nakitanda, (Uganda), Dr. Chin Sim Teoh, (Singapore) and Dr. Sonia Johnson, (Grenada).

The BG 2022 Games TUEs in a few key numbers

- 39 TUEs automatically recognized by the CGF TUEC
- 18 TUE applications received by the CGF TUEC, among which 13 were received before the Games and 5 were received during the Games (from the opening ceremony)
- Out of the 13 TUEs submitted to the CGF prior to the 2022 Games, 6 were not required, 7 were approved
- Out of the 5 TUEs submitted during the Games, 4 were approved, while no TUE was required for the 5th one given the substance concerned

⁶ The IO team did not review the content of the medical files or the rationale for the decisions made by the Games' TUEC to recognize, grant, or refuse a TUE. This is the role of WADA's Science and Medicine Department, which has a right of review in these matters.



Prior to the Games, the CGF updated its <u>anti-doping webpage on the CGF website</u>. When accessing the CGF TUE sub-section, the user could submit the necessary information for a TUE application to the CGF. If users required further information or had questions in relation to the CGF TUE process, they could contact the CGF *via* a dedicated TUE email address. During the Games, the CGF ADMC had physicians available on-site to provide support, should it be needed.

Under the CGF ADRs, athletes were not required to submit existing TUEs granted by their IF or their NADO for recognition ahead of the Games (i.e., before July 19, 2022). Rather, if the athlete's TUE was available in ADAMS, the TUE was automatically recognized. While the TUEC still had the right to review the TUE, this alleviated the need for the athlete to submit additional requests for recognition. The CGF process for the review of TUEs and applying mutual recognition principles was effective. Processing new TUE applications was also conducted efficiently and pragmatically. All TUEs approved or recognized were promptly entered in ADAMS, following the IO team's reminders regarding the requirement of Article 5.5 of the International Standard for Therapeutic Use Exemptions (ISTUE).

Between July 19 and August 10, 2022, all athletes participating in the BG 2022 Games were required to apply to the CGF for their TUE. The CGF TUEC received 18 TUE applications among which five were received after the opening ceremony (i.e., after July 28, 2022). Eleven out of these 18 TUEs were approved while the others were substances/methods that did not require a TUE.

While no decision rendered by the CGF TUEC was subject to an appeal, it must be noted that, as provided under the CGF ADRs, a decision by the CGF TUEC not to recognize or not to grant a TUE could be appealed by an athlete exclusively to an independent TUE appeals body operated by the Australian Sports Drug Medical Advisory Committee (ASDMAC).

A challenge that was identified by the TUEC in the course of the Games, and shared with the IO team, was the inability of some ADOs to process, in a timely fashion, TUE applications that had been submitted to them prior to the Birmingham Games. This produced challenges with TUE reviews and the CGF might usefully be in contact with all relevant ADOs prior to the next Games in order to ensure that this issue is improved.

Commendation

• **CGF**: The TUE application and recognition processes were clearly identified and have been applied throughout the Games by experienced physicians of the CGF TUEC. The constant concern to serve the interests of athletes as diligently, as effectively and as rapidly as possible must be noted. (C7)

Recommendation

 CGF: The CGF must ensure that all TUEs either approved or recognized are entered in ADAMS to allow proper compliance review from WADA in accordance with Article 5.5 of the ISTUE. (R12)

9. Intelligence

The gathering and collating of intelligence information has become a vital part of a robust anti-doping program. The CGF, in full recognition of this evolution, wisely relied on UKAD's intelligence and investigation framework for the BG 2022 Games.

Aside from UKAD's existing and well functioning network with other ADOs and law enforcement authorities, the focus for the Games was on sensitising security teams and housekeeping personnel in the athlete villages on



how to react if doping paraphernalia was discovered, and, also in promoting UKAD's 'Protect Your Sport' campaign amongst athletes and athlete support personnel. The 'Protect Your Sport' platform enables anyone to submit information, securely and confidentiality, regarding a potential anti-doping rule violation either by email, telephone, or online.

While this was a great initiative, the 'Protect Your Sport' campaign, which was promoted online and included in athlete welcome packages, could have been promoted further, for example by placing banners or posters in the athlete villages and the DCS to raise further awareness of the platform.

Given the sensitive nature of the topic, no detailed information will be included in this report. The IO team did observe, however, that information received was promptly reviewed, assessed and, where appropriate, processed, leading to multiple intelligence-led tests.

Commendation

• **UKAD/CGF**: The IO team would like to commend UKAD for the work conducted in intelligence, notably ahead of the event, targeting key actors, such as housekeeping personnel and security teams, to train them to share intelligence. These practices should continue to be further developed and implemented for future Games. *(C8)*

Recommendation

• **CGF**: It is advisable for future Commonwealth Games to rely on the NADO of the host country, or, in case the NADO is not in a position to provide that service, to seek collaboration with other organizations with an existing and well-working intelligence network, including WADA. Although the CGF relied on UKAD's 'Protect your sport' reporting tool developed by UKAD for these BG 2022 Games, it is recommended that the CGF develops and promotes its own tool to allow anyone willing to share information do so, at any time, including in between CGF events. (R13)

10. Technology

Technology has been a cornerstone of these Games. There has been a synergy of technology platforms to ensure smooth operations through the following tools:

Anti-Doping Administration and Management System - ADAMS:

The system was the main platform for test planning and implementation. Testing orders (TO), which included either named athletes or placeholders, were assigned to DCSM the day before each event.



Each TO included clear instructions as to which athlete or placement should be tested.

- Chain of custody electronic forms: completed daily by the DCSM, the electronic forms, used for the first time by UKAD, followed the samples from collection to the laboratory.
- **DCO Central**: WADA's paperless system, aiming at replacing paper DCFs, was successfully trialled with 16 athletes, including 16 DCFs and 18 samples collected, during the BG 2022. It was a "first" use, in-competition, of the application during a multi-sport major event. Both urine and blood samples were



successfully collected. The feedback received from the participants, DCOs and athletes, has been very positive.

Commendations

UKAD/CGF:

- UKAD's mastery of ADAMS, their responsiveness and the experience of their staff is to be commended. (C9)
- A good sign of innovation was the successful introduction by UKAD of the electronic chain of custody forms, which was automatically transferred to the relevant parties involved in the sample collections, therefore reducing the risk of errors and delays. (C10)

Recommendation

• **CGF**: To ensure that information is shared in a secure and confidential manner and to continue to optimize the CGF's operations, it is recommended that the CGF considers the use of, rather than mere emails, secured IT tools (e.g., *via* ShareFile) to share confidential information (e.g., with respect to TUE and results management cases). (R14)

11. Test Distribution Planning and Delivery

To support the work of the Pre-Games Taskforce and direct the Games-time TDP, a comprehensive Risk Assessment was conducted and documented by UKAD in accordance with the requirements of the ISTI.

In addition to the assessment of the sports/disciplines, an assessment of the nations attending the Games was conducted, considering the IO team's recommendations of the previous Commonwealth Games, notably by considering testing figures, AAF and ADRV data, medal successes at previous major games and ranking information as well as cultural indices.

Some of the factors that were taken into consideration contributed to the Risk Assessment score, whereas others were used for developing the TDP, only. A Risk Assessment scoring for both sports/disciplines as well as nations was developed by combining relevant data with associated weightings that reflect each component's importance to the overall risk score.

To avoid unnecessary delays accessing the participants' list, even though it might not be the final one, and the other relevant anti-doping information available in ADAMS for each of the participants, it is recommended that the CGF, in collaboration with the OC, anticipates as much as possible and ensures prompt registration of the athletes in ADAMS a few weeks before the beginning of the Games. For the BG 2022 Games, UKAD and the CGF could only be granted access to relevant information in ADAMS one week prior to the Games commencing.

Commendation

UKAD/CGF: The Risk Assessment as well as the scoring fully adhered to the <u>ISTI</u> and WADA's <u>Guidelines for Implementing an Effective Testing Program</u>. (C11)

Recommendations

• **UKAD/CGF**: Although UKAD reached out to the IFs for sport's season patterns as well as athletes' individual career patterns, feedback in this regard seemed to be limited. For future Games, it may be



worthwhile to look at additional or different ways to actively involve the IFs when developing the Risk Assessment. (R15)

• **CGF**: Regarding the management of the athletes list, due to athlete registration delays, UKAD and the CGF could only be granted access to relevant information in ADAMS one week prior to the Games commencing. The IO team recommends that the CGF, in collaboration with the OC, ensures prompt registration to avoid unnecessary delays accessing relevant and related anti-doping information. (R16)

11.1 Test Planning and Implementation

The TDP called for a total of 1,000 tests (urine and/or blood) to be conducted with around 100 tests to be carried out by the Pre-Games Taskforce ahead of the village opening through funding ADOs to conduct testing. A total of 150 tests was allocated to a contingency, notably destined to react to intelligence. The tests were subsequently allocated to the different sports in a rational and comprehensible manner, i.e., based on the Risk Assessment score and the predicted entries per sport, amongst others.

UKAD collected a total of 1,052 samples, of which 124 were blood and 915 were urine.

The TDP included detailed selection criteria for both OOC and IC testing for each sport considering the specificities of the sport as well as season and career patterns. While there were some concerns raised in the previous 2018 IO report about the predominant focus on medalists at the 2018 Commonwealth Games, the IO team felt that the approach taken at the BG 2022 Games reasonably addressed the multitude of doping risks while still protecting the 'integrity of medals' principle. Moreover, testing history prior to and during the Games was also considered which further allowed for test allocation to be commensurate with the Risk Assessment and hence increasing the efficiency of the TDP.

While 60% of the total tests were planned to be conducted OOC amounting to 481 urine and 116 blood samples, 54% of them were collected OOC, amounting to 457 urine and 101 blood samples. For some sports, though, a greater percentage of the tests were collected IC given there was limited doping risk during the OOC period based on the Risk Assessment.

The majority of OOC tests were to be conducted ahead of the opening ceremony, either in the athlete villages or at training venues, with the objective being to test athletes as soon as possible after their arrival. This endeavor turned out to be challenging due to a lack of accurate information on arrival dates and rooming lists. OOC testing continued throughout the Games, targeting athletes based on various criteria, such as performance, whereabouts monitoring or intelligence.

A total of 433 samples were planned to be collected IC, including 14 blood samples. The final number was 483 samples, which included four World and 97 Commonwealth Games records. The athletes who broke records were tested using a dedicated IC contingency pool of tests that was set up to not impact the IC tests already planned as part of the TDP. If National records required ratification, the tests were conducted on request and at the respective CGA's expense.

To avoid athletes being tested multiple times in a short period of time, it is recommended that the CGF considers, when testing during heats or preliminary rounds, not only testing the winners but also considering testing athletes that did not qualify for the finals. This could be considered in particular for sports or sport disciplines where heats and finals take place on the same day.



As to the sport-specific analysis, the projected numbers exceeded the Minimum Levels of Analysis (MLAs) set out in the Technical Document for Sport Specific Analysis (TDSSA). The Risk Assessment was used to identify the sports where additional analyses were to be allocated.

The BG 2022 Games testing program in a few key numbers according to ADAMS data

- 1,052 samples collected among which 124 were blood and 915 were urine samples, 483 were IC tests while 569 were OOC tests.
- 762 different athletes have been tested from 55 different sport nationality.

A detailed summary can be found in the appendixes of this report.

Commendations

CGF/UKAD:

- The CGF/UKAD must be commended for the quality of their testing program during the BG 2022 Games. (C12)
- The TDP of the previous Commonwealth Games was thoroughly reviewed by UKAD/CGF to identify areas for improvement, notably to ensure a higher proportion of OOC testing, as recommended in the previous IO report. The IO team acknowledges the efforts made by the CGF and UKAD to address the observations raised at the 2018 Games regarding the predominant focus on testing medalists. The 'integrity of medals' is believed to be upheld, not only by testing the medalists in competition, but also is strongly supported by targeting out-of-competition those higher ranked athletes who are likely to medal in advance of the competition, given that the peak risk period for doping is often prior to the competition itself. (C13)
- A TDP, as thoroughly it may have been developed, needs to have the flexibility to address new insights or findings. That flexibility was repeatedly observed to satisfaction by the IO team during Games-time. (C14)

Recommendation

• **CGF**: To avoid athletes being tested multiple times in a short period of time, it is recommended that the CGF considers, when testing during heats or preliminary, not only testing the winners but also considering testing athletes that did not qualify for the finals. This could be considered in particular for sports or sport disciplines where heats and finals take place on the same day. (R17)

11.2 Athlete Biological Passport (ABP) & Athlete Passport Management Unit (APMU)

While the original plan was not to conduct blood ABP tests during the Games Period, UKAD showed interest, a month prior to the Games, in putting a simple process in place for APMUs to make recommendations for further analysis or testing based on samples collected under the TA of the CGF.

There have been various constructive communications between WADA and UKAD to arrive at a suitable communication to ADOs and APMUs setting out the reasoning and providing instructions on how to submit recommendations. These communications to ADOs focused on how they could provide information to UKAD themselves but also explained what UKAD was asking APMUs to do.



The end result was similar to what was done at the most recent Olympic Games⁷, where it was decided to use existing APMUs instead of the appointment of a small number of external ABP experts to evaluate ABP profiles and deliver recommendations.

By close of Games, thirteen blood ABP samples were collected. UKAD received seventeen requests for further analysis and eight for further testing. These came from six different organisations (four APMUs and two NADOs).

Recommendation

• WADA: The IO team recommends considering harmonizing communication, setting out reasoning and providing instructions on how to submit ABP recommendations, between MEOs, ADOs and APMUs ahead of and during major events. Guidance for this could be included within the MEO and/or ABP Guidelines. (R18)

11.3 Whereabouts Information

As outlined in most previous IO reports, the collection of accurate and reliable whereabouts information at major games is a constant challenge given the numerous parties and data sources involved. Also, despite the unchallenged need for whereabouts information to support efficient and effective OOC testing, the collection of whereabouts information is not an end in itself, and the requirements imposed on athletes during Games-time must be proportionate.

For athletes that were already filing whereabouts information with an ADO, the whereabouts filings were accessed *via* ADAMS or the ADO receiving the whereabouts information, respectively.

In addition, each CGA had to provide to the CGF, during Games-time, the arrival and departure dates and accommodation information of all athletes in their delegation. As at previous Games, this information was sometimes incomplete, not available at all or turned out to be unreliable.

Although the CGAs may in principle be able to provide the required information, there may be short-term updates the CGAs are not aware of. It is therefore indispensable that the mostly otherwise available data, e.g., athlete's arrival/check-in or rooming lists, is made available to the anti-doping service provider. For instance, it was not without surprise that the team hotels would not provide rooming lists to the SCP for data protection reasons. A more holistic approach to collecting whereabouts information could reduce the gaps and reduce the burden on both athletes and the CGAs for providing and updating such information.

Recommendations

 CGF: For future events, the CGF should strive to make whereabouts information (which the athletes and CGAs are required to submit for the Games Period) more easily available to the anti-doping service provider by granting access to the respective databases. The CGF should make sure that their SCA is provided with up-to-date information to put in place a proper out-of-competition testing without advance notice. This should include information related to athlete's arrival/check-in or rooming lists. (R19)

⁷ As referenced within the <u>Independent Observer Report from the 2022 Tokyo Summer Olympic Games</u> or the <u>Independent Observer Report from the 2022 Beijing Winter Olympic Games</u>.



• WADA: In view of the challenge of all MEOs with regards to collecting appropriate and reliable whereabouts information, the IO team encourages WADA to consider the development of a dedicated 'Major Games' module in ADAMS allowing direct synchronization into ADAMS, including but not limited to long and short list management, participant lists (including athlete photos to facilitate the identification of the athletes for out-of-competition testing), specific whereabouts requirements and the ability to link this information to testing orders. (R20)

12. Sample Collection

12.1 Sample Collection Personnel

SCP were appointed to specific roles based on their knowledge and experience. Overall, most of the SCP was provided by UKAD, amounting to a total of 111 individuals, including 23 International Doping Control Officers (IDCOs), and over 150 volunteers, who fulfilled the role of chaperone. The following details the roles of these individuals:

- 24 DCSM
- 50 DCOs
- 12 BCOs

- 24 chaperone team leaders
- 150 chaperones
- 1 doping control manager

The 23 IDCOs were recruited from other Commonwealth countries to complement the team. These IDCOs were initially proposed by their respective NADO or RADO. IDCOs with various backgrounds were recruited by UKAD, some of them being highly experienced with several having participated in Olympic Games or other major events while others had been working at the regional level previously.

During the recruitment process, UKAD had drafted a job description and asked the ADOs who had proposed DCO applicants to confirm that their accredited DCO had been trained in line with the ISTI requirements. There was no one-to-one interview conducted by UKAD.

Once recruited and upon arrival in Birmingham, all IDCOs were requested to follow one mandatory training session on-site, mostly focussing on the testing material used by UKAD and on Games-time specifics.



While the type of accreditation delivered by the OC to the anti-doping workforce did not generally raise any concern, most of the IDCOs had been provided with an accreditation that referred to them as WADA staff and therefore not reflecting the reality of their status. This issue, which was raised during the Games, could unfortunately not be addressed on-site. The CGF must ensure that this is not repeated at any future Games.

Chaperones were selected out of the pool of 14,000 volunteers based on their preferences or their experience as volunteers at previous events. Chaperones were trained during two in-person training sessions one of which took place on-site shortly before the Games. The Chaperone Team Leaders repeatedly expressed their satisfaction with the selection of chaperones and the chaperones were observed to be very motivated and eager to learn and perform their task with the utmost diligence. Some of them even expressed their hopes to being recruited as chaperones or even as DCOs for UKAD or another ADO after the Games.



An extensive handbook containing all aspects of sample collection including Games-time specifics had been developed by UKAD and provided to the SCP ahead of the Games. The Doping Control Handbook, consisting of 81 pages, was deemed to be too extensive by some SCP and risked not being properly studied due to its size. A quick-reference book for the SCP could be more concise for them to use and reference. Given that the recruiting process is meant to ensure that personnel is already experienced and suitably trained, the quick-reference book could be set up as an *addendum* to existing manuals, that focuses on Games-time specifics, only.

A Doping Control Command Center (DCCC) was established in the city center of Birmingham that was permanently staffed with experienced UKAD staff members. The DCCC oversaw the entire doping control operations by receiving and reviewing intelligence, the paperwork and any potential feedback regarding the sample collection process, sample transportation or the sample collection personnel. Where appropriate, the DCCC provided instructions on any remedial actions that needed to be implemented on short notice, therewith ensuring that the procedures were compliant with the applicable rules and regulations. The DCCC was observed to be very reactive and effective in answering any issues raised by the IO team and any follow up action agreed by the CGF/UKAD by disseminating the respective information to the doping control stations.

Commendations

• **UKAD**: Overall, the quality of the work of the SCP was excellent and the roles assigned corresponded to the individual skill sets. In particular, the IO team observed that the DCOs showed a very profound understanding not only of the overall processes but also of the 'soft skills' that makes up the work of a DCO. (C15)

UKAD/OC:

- The doping control stations were very well staffed which allowed short-term testing requests to be implemented quickly and to also accompany the less experienced chaperones. (C16)
- Despite the sanitary COVID-related circumstances which could have caused negative last-minute impacts, there was never a lack of SCP on-site where the IO team visited, rather it was often noticed that large teams of SCP were available. (C17)

Recommendations

- **UKAD/CGF/OC**: On the flip side of the generous staffing, the DCS were sometimes crowded, which potentially could negatively affect the athlete's experience of the doping control process. It is recommended to schedule the number of SCP required according to the testing order and the competition schedule. It is also recommended to ensure that DCSMs are informed of the number of chaperones they are being provided with each day (in the case of the BG 2022 Games by the OC) to better anticipate their organization on-site. The IO team was surprised to be told that DCSMs would find out about the number of chaperones available once on-site, with no list available beforehand. (R21)
- **CGF**: Regardless of whether the local NADO can cover the SCP requirements itself, the involvement of SCP from other Commonwealth countries is to be recommended in terms of knowledge transfer and to assist in further strengthening the anti-doping programs of the respective countries. It is therefore strongly recommended that this approach is continued and considered for further expansion for future Commonwealth Games. (R22)



• **CGF/OC**: The accreditation of some IDCOs did not identify them as SCP but as WADA staff. Given that the identification of the SCP is exclusively done by means of the Games accreditation, it is crucial that the accreditation clearly states the SCP's role and the organization they work for. (R23)

12.2 Sample Collection Sessions

12.2.1 Doping Control Stations (DCS)

There was a total of 25 DCS spread over the four athlete villages and the 15 competition venues.

In general, the IO team found that the DCS were well set up and organized, considering that most of the DCS were set up on a temporary basis and not in pre-existing infrastructure. It must be highlighted that all SCP had been informed in advance of the set-up of each of the DCS they would be assigned to which helped them be fully operational shortly upon arrival.

The DCS usually consisted of an office for the DCSM, including a lockable cabinet for the secure storage of the samples, a waiting area, and several processing rooms. Entry and exit of individuals seeking access was consistently and properly logged.

The DCS were mostly well situated while away from the public, respecting the athletes' routines and privacy. As a downside, due to their proximity to the competition site, some of the indoor DCS were very noisy which made communication challenging, especially if there was a language barrier, which fortunately was rarely the case at the Commonwealth Games as most of the athletes are English speakers. As outlined in previous IO reports, directional signage in the venues was rather poor which repeatedly led to athlete support personnel not finding the DCS to join an athlete as a representative, and even, at least once, a chaperone got lost inside the venue after notifying an athlete.

While the setup of most DCS adhered to the minimum requirements, there were, in some DCS, a few issues identified regarding:

- accessibility for athletes in wheelchairs;
- insufficient lighting of the processing rooms or temporary toilets when testing after dusk;
- the portable toilets (those in the green plastic boxes) that were used in some temporary DCS were less comfortable compared to the portable toilets next door to the DCS for the use of spectators or Games Family members;
- the size of the waiting areas could have been adjusted according to the predicted number of tests to avoid overcrowding waiting areas during peak testing times; and
- the use of curtains to separate processing rooms was deemed insufficient for protecting the personal and confidential information athletes may provide during the sample collection process.

12.2.2 Athlete Notification

As outlined earlier in this report, locating athletes for testing OOC was challenging given the lack of reliable location information. Often the SCP had to contact team representatives to find the athletes which potentially



puts in jeopardy the fundamental no-advance notice principle⁸. In addition, the identification of the athlete turned out to be sometimes difficult as the SCP most often did not have a photo⁹ at hand and open-source searches for a picture of the athlete were sometimes inconclusive. That said, the SCP put a lot of effort into successfully locating athletes in line with the applicable rules.

To avoid media exposure, the notification for IC testing was most often conducted only after the mixed zone with the athletes being kept under constant observation by various chaperones placed in key areas which would guarantee having at least one chaperone constantly observing the athlete selected for testing. Chaperones were observed to approach the athletes in a very discreet and respectful manner.

On some occasions, the initial notification was done verbally, and while the IO team acknowledges that this approach can be appropriate under certain circumstances, the 'documented' notification (i.e., completing the paper or paperless notification) should be completed as soon as possible after the competition to avoid any potential and unnecessary misunderstandings and/or potential failures to comply.

It happened once that an athlete was notified in between competitions the same day. Whereas the SCP was perfectly aware that this should be avoided, the root cause was the absence of a detailed competition schedule. It should be ensured that the DCSM is provided with an up-to-date daily competition schedule in good time by the organizing committee, especially in sports where athletes compete in multiple competitions.

12.2.3 Sample Collection Procedures

The IO team is of the view that no major deviations were observed during the sample collection process. The SCP implemented applicable rules and regulations and created an athlete-friendly and stress-free environment, which was referred to repeatedly by athletes and athlete support personnel.

Sixteen test sessions were performed on WADA's DCO Central as a pilot and in collaboration with UKAD and the CGF. Aside from some minor issues, the pilot was a success with positive feedback from both the athletes and the sample collection personnel regarding the use of the application. The flexibility and much appreciated collaboration of the SCP and athletes involved in this pilot is to be highlighted (see also section 10 above with respect to DCO Central and paperless DCFs).

12.2.4 Security and Post-Test Administration

At the end of the sample collection session, DCFs were shared with the DCCC where they were reviewed and entered into ADAMS. Whereas the sample collection was in principle captured on paper forms, UKAD developed an electronic chain of custody form that was forwarded by email to all involved parties, as previously mentioned (see section 10 above). While no personal information was shared in such format, in respect to new technological tools that continue to be developed and implemented, the IO team recommends that any information shared during the Games related to anti-doping be shared *via* a secured system such as ShareFile. Sharing sensitive and personal information within an email should be avoided.

All samples were appropriately locked away in a cabinet in the DCS during the day. Blood samples were refrigerated in line with the applicable provisions.

⁸ As per the <u>ISTI</u>, *No Advance Notice Testing* is defined as Sample collection that takes place with no advance warning to the Athlete and where the Athlete is continuously chaperoned from the moment of notification through Sample provision.

⁹ In this regard, see the related recommendation (to WADA) in section 11 above.



After conclusion of the sample collection sessions of the day, either a courier picked up the samples from the venues or the DCSMs were required to personally deliver the samples to the DCCC from where they were shipped to the WADA-accredited King's College laboratory in London by courier once a day and often late overnight (see section 13 below).

Commendation

• **CGF/UKAD**: The athlete-friendly and stress-free environment in the numerous DCS must be commended by the IO team, as referred to repeatedly by athletes and athlete support personnel. (C18)

Recommendations

CGF/OC:

- The IO team recommends that DCSMs are provided with up-to-date daily competition schedules in good time by the OC, especially in sports where athletes compete in multiple competitions. (R24)
- The IO team recommends ensuring for future Games that all athletes at all venues, specifically those in wheelchair or with any kind of disability, have an appropriate access to toilets, especially should the facilities be portable ones, with a working and appropriate lighting in case testing happens after dusk. It is also recommended that the size of the waiting areas be adjusted according to the predicted number of tests to avoid overcrowding waiting areas during peak testing times, and that the personal and confidential information athletes may indicate during the sample collection process is always preserved (e.g., the use of self-supporting partition walls between processing rooms can be insufficient to preserve the confidentiality of verbal exchanges between the SCP, the athlete, and the ASP). (R25)
- Directional signage for the DCS should consistently be included in the competition venues and the athlete villages as it is important, for athlete support personnel wishing to join the athlete as a representative, to find the DCS. Directional signage was limited, and it appears that the OC, which was responsible for this, failed to install all the signs. This should be improved for future Games. (R26)
- More generally and as already included in the previous IO report (i.e., 2018 Commonwealth Games), it appears to be worth reminding that, ideally, and although there are updates and inputs that require flexibility and sometimes reactivity within the last months or weeks preceding the Games, the general principles (e.g., with respect to staffing, venue logistics and general operations) should be agreed upon between the CGF and its partners at least twelve months in advance so that all relevant contracts and arrangements can be established in a predictable fashion. (R27)
- **CGF**: It is recommended for future Commonwealth Games to implement a paperless sample collection system given that this not only contributes to the sustainability of the event but also facilitates the post-test administration. (R28)



13. Laboratory Activities

13.1 General

WADA's <u>International Standard for Laboratories (ISL)</u> recommends that MEOs consider transporting samples to the existing facilities of a WADA-accredited laboratory instead of establishing a new satellite laboratory facility, which would require significant resources and efforts. For the Birmingham 2022 Games, the existing WADA-accredited laboratory facilities, located in London, were utilized for the Games analytical testing services. The London Laboratory, 'Drug Control Centre – King's College London', located in the British capital, was about 200 km away from most of the venues based in or around Birmingham (except for the Lee Valley VeloPark¹⁰ based in London).

While no IO team member was assigned to witness the London Laboratory operations during the Games Period, it appeared necessary to comment on the indirect observations made, in particular through the delay in reporting laboratory results in ADAMS.

13.2 Reporting Results of Analyses

Prior to the event, the CGF, *via* its providers, and the London Laboratory, agreed on a turnaround time for reporting AAFs of between 24 and 72 hours depending on the period concerned (i.e., before the opening ceremony, during the first and then second half of competition).

However, due to the pandemic and unexpected broken material or blocked equipment at Customs, the IO team observed a reporting delay that increased as the event progressed and which, for adverse results, ranged from four to 27 days. Confirmation analyses were similarly delayed with some implications for the management of AAFs. While the IO team acknowledges that some of the delays were the results of unforeseen circumstances, the CGF should give thought to potential mitigating measures that could be put in place for future Games to avoid such delays. It is critical at the Games that a short turnaround time for the reporting of results is respected to enable immediate provisional suspension where requested, as per ISRM Article 6.0, so that the athlete does not contaminate the results of any other competition they may be participating in while their case is being considered. The respect of such short turnaround time during the Games is also important to ensure a proper implementation of Article 11.1.1 of the CGF ADRs, providing that where more than one member of a team in a Team Sport has been notified of an ADRV in connection with the BG 2022 Games, the CGF would conduct appropriate target testing of the team during the Games Period.

Recommendation

• **CGF:** As it is critical at the Games that a short turnaround time for the reporting of results is respected, the IO team recommends that the CGF gives thought to any measures that could be put in place to prevent (and avoid, as much as possible) lengthy delays with the reporting of results. (R29)

¹⁰ The track cycling competitions took place at the Lee Valley VeloPark on Queen Elizabeth Park in London.



14. Results Management

The CGF handled results management administration for potential ADRVs 'in-house' for most of the process, delegating its hearings and hearing decisions' responsibilities to Sport Resolutions, a UK-based independent dispute resolution service for sport.

BG 2022 Games Results Management activities in a few key numbers

- 4 AAFs during the Games Period involving 4 athletes from 4 different sports and 4 different countries. 1 of these cases is the result of an OOC test.
- Half of the alleged ADRVs involve non-specified substances.
- 1 ATF

As per the CGF ADRs, the procedural rules of Sport Resolutions pertaining to the composition of first instance hearing panels and the conduct of proceedings before them would apply to proceedings brought under the CGF ADRs. It was the responsibility of Sport Resolutions to ensure that the athlete or other person is provided with a fair hearing within a reasonable time by a fair, impartial, and operationally independent hearing panel in compliance with the Code and the International Standard for Results Management (ISRM). Any decisions regarding ADRVs could be appealed exclusively to the Court of Arbitration for Sport (CAS), in accordance with the CAS Code of Sports related Arbitration.

The CGF ADMC also developed some internal documents, including 'Process for Non-Analytical Investigations' and 'Detailed Results Management Process – Adverse Analytical Finding (AAF)'. These provided guidance on the steps to be followed should a possible non-analytical ADRV or an AAF be reported to the CGF during the Games. These documents outlined, in particular, the required actions to be implemented by the relevant parties as well as the relevant communications protocols.

While the IO team encourages the CGF to continue developing such internal procedural and guidance documents, given that the IO team provided feedback on both procedures during the Games to ensure they accurately reflected the Code and the CFG ADRs, it is recommended that a detailed review of such documents is made well ahead of the event to ensure that there are no inconsistencies that would possibly lead to misinterpretations or misapplication of the CGF ADRs.

Despite some feedback on internal documented processes, all results management procedures were conducted as per the CGF ADRs. While some results management related activities (i.e., investigations on an atypical finding and potential failure to comply, initial phases of an AAF review) occurring in Birmingham, no hearing took place during the Games and the IO team was not present for the full results management process of any of the four AAFs reported by the London Laboratory. The IO team, however, had the opportunity to observe some steps of ATF, AAFs and pre-results non-analytical activities.

Atypical Finding

During the Games Period, the London Laboratory reported an ATF related to a sample collected the day before the opening ceremony (see Appendix 4 for more details).



After having conducted the relevant investigations as provided under <u>ISRM</u> Article 5.2, the CGF decided not to move forward¹¹, i.e., this ATF did not lead to an AAF. While all relevant procedures were followed, the IO team had to remind the CGF of the requirement of <u>ISRM</u> Article 5.4, where, if the RMA decides not to move forward with a matter, it must give notice (with reasons) to the ADOs with a right of appeal (which includes WADA, the IF and the NADO of the athlete) under Code Article 13.2.3. While the CGF ultimately did so, this should be considered for future Games processes.

Adverse Analytical Findings

Four AAFs were reported by the London Laboratory following the analysis of samples collected during the Games Period (see Appendix 4 for more details about these AAFs), however and due to delays in reporting, only one out of the four AAFs was reported during the Games Period.

The IO team had therefore the opportunity to follow the very first steps of the results management process of the first AAF reported.

The IO team was able to assist the CGF ADMC with ensuring that all the information mentioned under <u>ISRM</u> Article 5.1.2.1 was included in the first notification letter sent to the athlete, including the opportunity for the athlete to provide substantial assistance (as per Article 5.1.2.1. g)¹². The IO team also recommended that the delay provided to the athlete to request a B-sample analysis as well as to share explanations (in that present case, the athlete was offered a 10-day delay) are shortened and possibly included, in the future, in the CGF ADRs to better fit in with the MEO environment specificities.

Possible Non-Analytical Findings

On two different occasions during the Games, the CGF conducted investigations as per <u>ISTI</u> Article 12.0 after having been informed of apparent failures to comply with sample collection procedures by two athletes. Both investigations ¹³ were conducted in close cooperation with UKAD which provided the CGF with its own investigators. For both cases, it was decided by the CGF ADMC not to move forward, and both athletes were informed immediately.

However, following the completion of the investigation, not all the relevant stakeholders were informed promptly about the investigation outcomes. The IO team reminded the CGF of its obligations, under <u>ISTI</u> Article 12.3.3, which outlines that, where an ADO concludes, based on the results of its investigation, that proceedings should not be brought forward against the athlete or other person asserting commission of an ADRV:

- It shall notify WADA and the Athlete's or other Person's IF and NADO in writing of that decision, with reasons, in accordance with Code Article 14.1.4.

¹¹ The IO team did not review the content of the investigations conducted but reminded of the importance to meet the <u>ISRM</u> requirements when reviewing an ATF. This is the role of WADA's Legal Department, which has a right of appeal in these matters.

¹² In the notice of charge (i.e., second notification letter) sent to the athlete at the end of the Games, the IO team observed, during a post-Games review, that the mention that the consequences will be binding on all signatories (see <u>ISRM</u> Article 7.1c) was missing. The CGF ADMC is reminded that all the information mentioned under <u>ISRM</u> Article 7.1 is required to be included in the second notification letter.

¹³ The IO team did not review the content of the investigations conducted but reminded of the importance to meet the <u>ISTI</u> and <u>ISRM</u> requirements when conducting investigations (as per <u>ISTI</u> Article 12.0) of any non-analytical information and/or intelligence where there is reasonable cause to suspect that an anti-doping rule violation may have been committed. This is the role of WADA's Legal Department, which has a right of appeal in these matters.



- It shall provide such other information about the investigation as is reasonably required by WADA and/or the IF and/or NADO in order to determine whether to appeal against that decision.
- In any event, it shall consider whether any of the intelligence obtained and/or lessons learned during the investigation should be used to inform the development of its TDP and/or to plan target testing, and/or should be shared with any other body.

In addition, it should be noted that, the CGF ADRs do also provide, under their Article 5.8.8, that "The CGF will keep WADA informed of its investigations in accordance with the requirements of the <u>ISTI</u>, including advising WADA where the CGF decides following an investigation not to assert that an Athlete or other Person has committed an anti-doping rule violation. That decision will be notified to other parties pursuant to Article 7.4 and may be appealed pursuant to Article 12" (*sic*).

It should also be noted that the CGF was able to secure legal aid services in collaboration with the OC, which was available to any athlete involved in a results management case. Through that aid, athletes were offered a possibility to consult with a professional legal counsel whose service was complimentary. Legal aid also covered representation of an athlete by professional legal counsel during a results management process including during a hearing. This service was provided by a local law firm, namely <u>Birmingham Law Society</u>.

Commendation

• **CGF/OC**: The IO team would like to commend the legal aid mechanism which was made available to all BG 2022 athletes to provide support if and where needed during the results management process. This, once again, fully reflects the CGF ADMC's objective to preserve and continuously act in the best interests of the Commonwealth athletes. Developing and promoting these complimentary services for the next Games is encouraged. (C19)

Recommendations

- CGF:
 - To facilitate its work and to assist with the review of any internal processes, the CGF is invited to use the multiple results management resources (including templates, checklists, guidelines) published by WADA on ADEL. (R30)
 - The IO team recommends that the delay provided to the athlete to request a B-sample analysis as well as to share explanations are adapted to be more aligned with the MEO environment. In this respect, it is recommended to include timeframes for results management cases directly in the CGF ADRs. (R31)

15. Ensuring Continuity of Improvements to the Next Games

Two major projects, perceived by the IO team as real opportunities to progress and ensure the necessary continuity between the CGF Games, were launched at the occasion of the BG 2022 Games. The first one is the MOU signed between WADA and the CGF on July 26 and the second one is a Legacy Project, initiated by Commonwealth Games ADOs (NADOs and RADOs) and officially launched on August 3, 2022.



15.1 The WADA-CGF MOU signed during the BG 2022 Games

A MOU was signed between WADA and the CGF to collaborate on a range of anti-doping program development activities. The signing took place during the CGF's General Assembly in Birmingham, in the lead-up to the BG 2022 Games.

The MOU, which was signed by WADA President Witold Bańka and CGF President Dame Louise Martin, will run for an initial term of four years with the objective of creating a partnership between the two organizations to facilitate joint activities within the CGF member nations and territories, thereby contributing to the strengthening of the World Anti-Doping Program.



This agreement's objective is to guide the two organizations in implementing joint programs. Its focus will be on building anti-doping capacity around the world and, as a result, should enhance the capabilities of all CGF members. Under the terms of the MOU, the CGF will collaborate with WADA on the development and implementation of various capacity-building programs relevant to anti-doping, including in the areas of education, compliance monitoring, science and medicine, Games planning and support, and athlete engagement.

15.2 The Legacy Project launched during the BG 2022 Games

On August 3, 2022, UKAD and a steering group of NADOs and RADOs from the UK, Australia, Kenya, the Caribbean, Canada and South-East Asia agreed to work together on a Legacy Project through an action plan to share best practices in the lead up to the next Commonwealth Games. The main objective of the group is to help improve the standard of athlete education and the standard of anti-doping process across the Commonwealth.

This group is due to map the current anti-doping capabilities of all 72 Commonwealth nations and territories. UKAD will undertake the role of Secretariat for the first year of the project. From 2023, this responsibility will be passed to Sport Integrity Australia in preparation for the Victoria 2026 Games.

President of the Commonwealth Games Federation, Dame Louise Martin, who attended the <u>launch event</u>, said "I hope to see that by the time we get to the Games in Victoria 2026, that every athlete, every coach has the benefit and knowledge of all aspects of anti-doping and that they know how to train and compete, knowing that they are competing like for like".

15.3 Two tools for a Successful Anti-Doping Program within Commonwealth Nations and Territories

The global anti-doping system relies on collaboration between various stakeholders, and this MOU between WADA and the CGF as well as the Legacy Project will undoubtedly boost and strengthen the anti-doping programs of the CGF and of Commonwealth-related ADOs.

The IO team could not hope for a better set-up to enable the CGF and its partners to address and implement the recommendations pointed out in this report as well as to make the most of the commendations shared.

The CGF is undoubtedly fully aware of the opportunities offered by these two concomitant projects which also represent a great chance and possibility for the CGF to place itself among the signatory MEOs that could serve as a model for other MEOs in the future, making a meaningful contribution to the worldwide movement to protect the integrity of sport.



Commendation

• **CGF**: The IO team congratulates the parties involved in making the Legacy Project and the WADA-CGF MOU come to life, and which work towards strengthening the anti-doping strategy of the CGF and spreading anti-doping culture and knowledge more homogeneously among all Commonwealth Games nations and territories. (C20)

Recommendation

• **CGF**: Given the limited resources available within the CGF dedicated to anti-doping between each edition of the Games, the CGF is encouraged to use the opportunities of its Legacy Project and of the collaboration agreement signed with WADA, to engage in dialogue with its key stakeholders as early as possible to ensure continuity between events and ensure that findings of previous IO reports are addressed as well as to continue to enhance its anti-doping structure within the CGF. In this respect, the CGF may consider the benefit of setting up a fully dedicated anti-doping commission and separating it from its medical responsibilities and activities, which could fall within the scope of a separate commission. (R32)

*

* *



APPENDIXES

APPENDIX 1: Collated Commendations and Recommendations

A.1.1 Commendations

C1	CGF/UKAD : The international touch and the diversity of the various people involved in the anti-doping program of the BG 2022 Games, not only within the CGF ADMC but also within the anti-doping workforce itself, undoubtedly contributed to the success of these Games as well as future anti-doping programs. This is to be commended, not only in that it allows the sharing of experiences and skills of each person involved, but it also contributes to improving capacity building and raises everyone's knowledge.
C2	CGF : The Taskforce concept within the CGF is now well advanced and its partners (NADOs and IFs) must be made aware that their contributions in sharing test plans and outcomes contributed to making the CGF testing program a success. A Taskforce initiative of this magnitude (not limited to testing initiatives) was a first for the CGF and it is commendable that the Taskforce also included the activities of the education program.
C3	CGF/Taskforce : The Taskforce and its members should be congratulated for the significant efforts made which contributed to sending a strong message to prospective athletes that the CGF and UKAD were committed to protecting the integrity of the Games by maximizing the chances of detecting and deterring doping amongst prospective Games participants.
C4	CGF/Taskforce : The high level of collaboration between ADOs as well as with other stakeholders is to be highlighted. The important and necessary follow-up conducted by the Taskforce to ensure as much consistency and continuity as possible, as well as an efficient transfer of knowledge and intelligence from the Pre-Games Taskforce to the Games-time team must also be noted.
C5	CGF/Taskforce : The IO team commends the CGF and its pre-games Taskforce for conducting tests in advance of the CGF jurisdiction starting, i.e., before the opening of the village in collaboration with the respective IFs and NADOs, and encourages the CGF to continue as this will assist in increasing the unpredictability of the program with a focus on those higher risk sports and athletes that have a limited testing history during the crucial preparation phase for the Games.
C6	CGF : It is noted that for a MEO to work in partnership with an established NADO like UKAD to deliver the education program is a great way to leverage expertise, as well as local knowledge.
C7	CGF : The TUE application and recognition processes were clearly identified and have been applied throughout the Games by experienced physicians of the CGF TUEC. The constant concern to serve the interests of athletes as diligently, as effectively and as rapidly as possible must be noted.
C8	UKAD/CGF : The IO team would like to commend UKAD for the work conducted in intelligence, notably ahead of the event, targeting key actors, such as housekeeping personnel and security teams, to train them to share intelligence. These practices should continue to be further developed and implemented for future Games.
C9	UKAD/CGF : UKAD's mastery of ADAMS, their responsiveness and the experience of their staff is to be commended.
C10	UKAD/CGF : A good sign of innovation was the successful introduction by UKAD of the electronic chain of custody forms, which was automatically transferred to the relevant parties involved in the sample collections, therefore reducing the risk of errors and delays.
C11	UKAD/CGF : The Risk Assessment as well as the scoring fully adhered to the <u>ISTI</u> and WADA's <u>Guidelines for Implementing</u> an <u>Effective Testing Program</u> .
C12	CGF/UKAD: The CGF/UKAD must be commended for the quality of their testing program during the BG 2022 Games.
C13	CGF/UKAD : The TDP of the previous Commonwealth Games was thoroughly reviewed by UKAD/CGF to identify areas for improvement, notably to ensure a higher proportion of OOC testing, as recommended in the previous IO report. The IO team acknowledges the efforts made by the CGF and UKAD to address the observations raised at the 2018 Games regarding the



	predominant focus on testing medalists. The 'integrity of medals' is believed to be upheld, not only by testing the medalists in competition, but also is strongly supported by targeting out-of-competition those higher ranked athletes who are likely to medal in advance of the competition, given that the peak risk period for doping is often prior to the competition itself.
C14	CGF/UKAD : A TDP, as thoroughly it may have been developed, needs to have the flexibility to address new insights or findings. That flexibility was repeatedly observed to satisfaction by the IO team during Games-time.
C15	UKAD : Overall, the quality of the work of the SCP was excellent and the roles assigned corresponded to the individual skill sets. In particular, the IO team observed that the DCOs showed a very profound understanding not only of the overall processes but also of the 'soft skills' that makes up the work of a DCO.
C16	UKAD/OC : The doping control stations were very well staffed which allowed short-term testing requests to be implemented quickly and to also accompany the less experienced chaperones.
C17	UKAD/OC : Despite the sanitary COVID-related circumstances which could have caused negative last-minute impacts, there was never a lack of SCP on-site where the IO team visited, rather it was often noticed that large teams of SCP were available.
C18	CGF/UKAD : The athlete-friendly and stress-free environment in the numerous DCS must be commended by the IO team, as referred to repeatedly by athletes and athlete support personnel.
C19	CGF/OC : The IO team would like to commend the legal aid mechanism which was made available to all BG 2022 athletes to provide support if and where needed during the results management process. This, once again, fully reflects the CGF ADMC's objective to preserve and continuously act in the best interests of the Commonwealth athletes. Developing and promoting these complimentary services for the next Games is encouraged.
C20	CGF : The IO team congratulates the parties involved in making the Legacy Project and the WADA-CGF MOU come to life, and which work towards strengthening the anti-doping strategy of the CGF and spreading anti-doping culture and knowledge more homogeneously among all Commonwealth Games nations and territories.

A.1.2 Recommendations

R1	CGF : While several documents (including a draft Risk Assessment, a draft Test Distribution Plan, the Education Strategy, the Policy for Long-Term Storage) in relation to the anti-doping program of the BG 2022 Games had been provided to WADA during the pre-event WADA Compliance monitoring process (i.e., through the Code Compliance Questionnaire (CCQ)), the IO team recommends that the CGF does share these documents, if updated, as well as internal TUE, results management and testing processes and policies with the IO team sufficiently in advance of the event (i.e., at least a month before the opening ceremony, as per the IO agreement). The IO team requested, on a few occasions, to receive updated documents, however, only a few were provided before the Games started, despite several others which could have also been provided. On-site reception of key documents is likely to delay any input on these by the IO team.
R2	CGF : It is recommended that the CGF considers extending its jurisdiction one or two-months before the Games as other MEOs have started to do recently, to conduct out-of-competition and in-competition testing on any athlete entered to, or who may be entered to, participate in the Games. This additional time of testing jurisdiction would allow the CGF, or a delegated third party such as the local NADO, on behalf of the CGF, to coordinate tests on athletes who may not have been sufficiently tested in the lead up to the Games, prior to their arrival on-site.
R3	CGF/OC : It is recommended that the CGF reflects on any mechanisms or procedures it can put in place for future Games to ensure that the local organizing committee can react promptly to issues raised during the Games. This might be by ensuring staff with the appropriate level of authority are dedicated to anti-doping during the Games and committed to quick problem solving.
R4	CGF/Taskforce : As mentioned in the previous IO report, future Taskforce initiatives would be well advised to begin their work as far as twelve months prior to the Games in order to maximize success, especially with respect to the testing recommendations (it is indeed recommended to issue recommendations for high-risk sports with sufficient time prior to future Games, to allow them to be incorporated into ADOs' test planning cycles). The public announcement of the Taskforce should also be made as early as possible to support engagement with other ADOs. The CGF is strongly encouraged to take the necessary actions to make such multi-disciplinary Taskforce become a permanent and robust fixture of future editions of the Games and can begin their work as close as possible to twelve months prior the Games beginning.



R5	CGF/Taskforce : As far as education is concerned, it is suggested to explore the opportunity of requiring the completion of Pre-Games anti-doping education courses for all participants (i.e., athletes, athlete support personnel, etc.) and to consider developing an online registration platform for all participants who would each have to upload a valid anti-doping training course certificate (i.e., specifying the period of validity and by whom this certificate would need to be issued to be accepted, e.g., WADA, the CGF, an IF or a NADO).
R6	CGF/Taskforce : As far as testing initiatives and intelligence gathering are concerned, it is recommended to consider thinking about setting up a system to allow access to long lists of potential participants in the Games sufficiently well in advance of the Games.
R7	CGF/Taskforce : While the CGF funded several tests ahead of the Games, since it was not the Testing Authority, the CGF was not notified of laboratory results. As such, the CGF and future Taskforces are invited, as WADA did in a Pre-Games communication sent to all ADOs, to promptly and diligently remind all concerned ADOs, particularly as the beginning of the Games approaches, to follow-up with the relevant WADA-accredited laboratories if results for prospective athletes (and/or participating athletes) have not been reported or the agreed reporting date with the laboratory has passed. It is also recommended, especially should testing occur very close to the beginning of the Games, to remind ADOs of the possibility to request from the relevant laboratory a quick turn-around analysis and/or indicate to the laboratory that a particular sample is a 'priority' sample for analysis and agree on a date as to when that sample should be reported (please, also see in this respect WADA's Checklist 'Testing of Athletes and Major Events' published by WADA in the Code Implementation Support Program (CISP) on ADEL).
R8	CGF : Despite the rather high number of athlete villages at the BG 2022 Games, it is recommended, for future Games, to consider extending event-based education activities to all residential villages (with a minimum of one day in each of them). If event-based education activities take place in one specific location only, it is recommended to consider the options available to promote these activities through athletes and ASP (e.g., giving athletes the opportunity to fill out an online quiz/survey before inviting them to come and visit the booth to pick up prizes so expand the reach of the engagement).
R9	CGF : While all the information required under Code Article 18.2 was available on the CGF website, the CGF is invited to structure its anti-doping section differently, not only to make it more user-friendly and easier to navigate for athletes and ASP but also to make it more accessible and to facilitate the search for information.
R10	CGF : It is recommended to use the DCS to promote even more actively and inform about various anti-doping tips (e.g., supplements) through various tools such as sustainable/eco-friendly posters and banners, QR codes, etc.
R11	CGF : As far as objectives and monitoring of the Education Strategy are concerned, it is recommended that the CGF ensures it reviews the activities implemented in order to incorporate lessons learned and its assessment of the strategy/objectives to best prepare for the next events.
R12	CGF : The CGF must ensure that all TUEs either approved or recognized are entered in ADAMS to allow proper compliance review from WADA in accordance with Article 5.5 of the ISTUE.
R13	CGF : It is advisable for future Commonwealth Games to rely on the NADO of the host country, or, in case the NADO is not in a position to provide that service, to seek collaboration with other organizations with an existing and well-working intelligence network, including WADA. Although the CGF relied on UKAD's 'Protect your sport' reporting tool developed by UKAD for these BG 2022 Games, it is recommended that the CGF develops and promotes its own tool to allow anyone willing to share information do so, at any time, including in between CGF events.
R14	CGF : To ensure that information is shared in a secure and confidential manner and to continue to optimize the CGF's operations, it is recommended that the CGF considers the use of, rather than mere emails, secured IT tools (e.g., via ShareFile) to share confidential information (e.g., with respect to TUE and results management cases).
R15	UKAD/CGF : Although UKAD reached out to the IFs for sport's season patterns as well as athletes' individual career patterns, feedback in this regard seemed to be limited. For future Games, it may be worthwhile to look at additional or different ways to actively involve the IFs when developing the Risk Assessment.
R16	CGF : Regarding the management of the athletes list, due to athlete registration delays, UKAD and the CGF could only be granted access to relevant information in ADAMS one week prior to the Games commencing. The IO team recommends that the CGF, in collaboration with the OC, ensures prompt registration to avoid unnecessary delays accessing relevant and related anti-doping information.



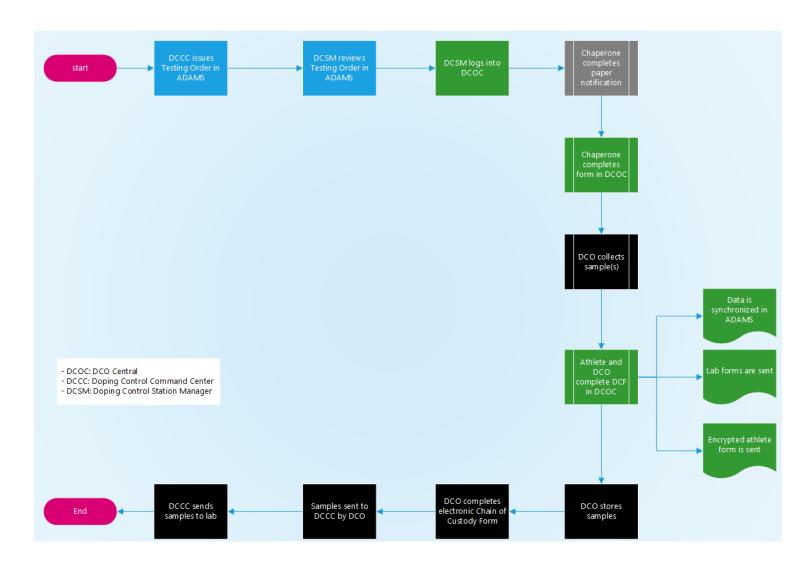
R17	CGF : To avoid athletes being tested multiple times in a short period of time, it is recommended that the CGF considers, when testing during heats or preliminary, not only testing the winners should testing be expected to take place during finals i.e., during heats or preliminary finals, also test athletes that did not qualify for the finals.
R18	WADA : The IO team recommends considering harmonizing communication, setting out reasoning and providing instructions on how to submit ABP recommendations, between MEOs, ADOs and APMUs ahead of and during major events. Guidance for this could be included within the MEO and/or ABP Guidelines.
R19	CGF: For future events, the CGF should strive to make whereabouts information (which the athletes and CGAs are required to submit for the Games Period) more easily available to the anti-doping service provider by granting access to the respective databases. The CGF should make sure that their SCA is provided with up-to-date information to put in place a proper out-of-competition testing without advance notice. This should include information related to athlete's arrival/check-in or rooming lists.
R20	WADA : In view of the challenge of all MEOs with regards to collecting appropriate and reliable whereabouts information, the IO team encourages WADA to consider the development of a dedicated 'Major Games' module in ADAMS allowing direct synchronization into ADAMS, including but not limited to long and short list management, participant lists (including athlete photos to facilitate the identification of the athletes for out-of-competition testing), specific whereabouts requirements and the ability to link this information to testing orders.
R21	UKAD/CGF/OC : On the flip side of the generous staffing, the DCS were sometimes crowded, which potentially could negatively affect the athlete's experience of the doping control process. It is recommended to schedule the number of SCP required according to the testing order and the competition schedule. It is also recommended to ensure that DCSMs are informed of the number of chaperones they are being provided with each day (in the case of the BG 2022 Games by the OC) to better anticipate their organization on-site. The IO team was surprised to be told that DCSMs would find out about the number of chaperones available once on-site, with no list available beforehand.
R22	CGF : Regardless of whether the local NADO can cover the SCP requirements itself, the involvement of SCP from other Commonwealth countries is to be recommended in terms of knowledge transfer and to assist in further strengthening the anti-doping programs of the respective countries. It is therefore strongly recommended that this approach is continued and considered for further expansion for future Commonwealth Games.
R23	CGF/OC : The accreditation of some IDCOs did not identify them as SCP but as WADA staff. Given that the identification of the SCP is exclusively done by means of the Games accreditation, it is crucial that the accreditation clearly states the SCP's role and the organization they work for.
R24	CGF/OC : The IO team recommends that DCSMs are provided with up-to-date daily competition schedules in good time by the OC, especially in sports where athletes compete in multiple competitions.
R25	CGF/OC : The IO team recommends ensuring for future Games that all athletes at all venues, specifically those in wheelchair or with any kind of disability, have an appropriate access to toilets, especially should the facilities be portable ones, with a working and appropriate lighting in case testing happens after dusk. It is also recommended that the size of the waiting areas be adjusted according to the predicted number of tests to avoid overcrowding waiting areas during peak testing times, and that the personal and confidential information athletes may indicate during the sample collection process is always preserved (e.g., the use of self-supporting partition walls between processing rooms can be insufficient to preserve the confidentiality of verbal exchanges between the SCP, the athlete, and the ASP).
R26	CGF/OC : Directional signage for the DCS should consistently be included in the competition venues and the athlete villages as it is important, for athlete support personnel wishing to join the athlete as a representative, to find the DCS. Directional signage was limited, and it appears that the OC, which was responsible for this, failed to install all the signs. This should be improved for future Games.
R27	CGF/OC : More generally and as already included in the previous IO report (i.e., 2018 Commonwealth Games), it appears to be worth reminding that, ideally, and although there are updates and inputs that require flexibility and sometimes reactivity within the last months or weeks preceding the Games, the general principles (e.g., with respect to staffing, venue logistics and general operations) should be agreed upon between the CGF and its partners at least twelve months in advance so that all relevant contracts and arrangements can be established in a predictable fashion.
R28	CGF : It is recommended for future Commonwealth Games to implement a paperless sample collection system given that this not only contributes to the sustainability of the event but also facilitates the post-test administration.



R29	CGF : As it is critical at the Games that a short turnaround time for the reporting of results is respected, the IO team recommends that the CGF gives thought to any measures that could be put in place to prevent (and avoid, as much as possible) lengthy delays with the reporting of results.
R30	CGF : To facilitate its work and to assist with the review of any internal processes, the CGF is invited to use the multiple results management resources (including templates, checklists, guidelines) published by WADA on ADEL.
R31	CGF : The IO team recommends that the delay provided to the athlete to request a B-sample analysis as well as to share explanations are adapted to be more aligned with the MEO environment. In this respect, it is recommended to include timeframes for results management cases directly in the CGF ADRs.
R32	CGF : Given the limited resources available within the CGF dedicated to anti-doping between each edition of the Games, the CGF is encouraged to use the opportunities of its Legacy Project and of the collaboration agreement signed with WADA, to engage in dialogue with its key stakeholders as early as possible to ensure continuity between events and ensure that findings of previous IO reports are addressed as well as to continue to enhance its anti-doping structure within the CGF. In this respect, the CGF may consider the benefit of setting up a fully dedicated anti-doping commission and separating it from its medical responsibilities and activities, which could fall within the scope of a separate commission.



APPENDIX 2: Paperless DCF Operation Diagram





APPENDIX 3: Testing Data

A.3.1 Number of Samples per Test Type (IC or OOC)

Sample Type	In-Competition	Out-of- Competition	Total
Blood	23	101	124
Blood passport	2	11	13
Urine	458	457	915
Grand Total	483	569	1052

A.3.2 Number of Samples collected per Sport (IC or OOC)

Sport	In- Competition	Out-of- Competition	Total 121 193 12 20 96	
Aquatics	82	39	121	
Athletics	83	110	193	
Badminton	11	1	12	
Basketball	15	5	20	
Boxing	29	67	96	
Cricket	6	6	12	
Cycling	62	75	137	
Field Hockey	10	17	27	
Gymnastics	12	12	24	
Judo	14	29	43	
Netball	5	8	13	
Para-Athletics	20	22	42	
Para-Powerlifting	9	17	26	
Para-Swimming	10	13	23	
Rugby Union	16	39	55	
Squash	12	3	15	
Triathlon	14	11	25	
Weightlifting	36	80	116	
Wrestling	13	15	28	
Bowls	10		10	
Table Tennis	10		10	
Volleyball	4		4	
Grand Total	483	569	1052	



A.3.3 Type of Sample by Sport (Blood, Blood Passport, Urine)

Sport	Blood	Blood passport	Urine	Total
Aquatics	7		114	121
Athletics	27	9	157	193
Badminton	1		11	12
Basketball	1		19	20
Bowls			10	10
Boxing	11		85	96
Cricket	1		11	12
Cycling	19	3	115	137
Field Hockey	2		25	27
Gymnastics	1		23	24
Judo	4		39	43
Netball	1		12	13
Para-Athletics	4		38	42
Para-Powerlifting	5		21	26
Para-Swimming	3		20	23
Rugby Union	10		45	55
Squash			15	15
Table Tennis			10	10
Triathlon	2	1	22	25
Volleyball			4	4
Weightlifting	23		93	116
Wrestling	2		26	28
Grand Total	124	13	915	1052



A.3.4 IC and OOC Testing per Date

Date	In-Competition	Out-of-Competition	Total
Jul	128	413	541
22-Jul		15	15
23-Jul		40	40
24-Jul		49	49
25-Jul		50	50
26-Jul		38	38
27-Jul		90	90
28-Jul		47	47
29-Jul	33	40	73
30-Jul	50	12	62
31-Jul	45	32	77
Aug	355	156	511
01-Aug	35	31	66
02-Aug	58	32	90
03-Aug	72	28	100
04-Aug	27	20	47
05-Aug	39	37	76
06-Aug	51	8	59
07-Aug	60		60
08-Aug	13		13
Grand Total	483	569	1052



APPENDIX 4: Results Management Data

A.4.1 Atypical Finding (ATF) - Summary

Test type	Analysis result	Substance Class	Substance	Outcome
ООС	ATF	S1. Anabolic Androgenic Steroids (AAS)	19-norandrosterone	Decision not to move forward

A.4.2 Adverse Analytical Findings (AAFs) – Summary

Test type	Analysis Results	Substance Class	Substances	Outcome
OOC	AAF	S5. Diuretics and Masking	Furosemide	ADRV
IC	AAF	S1.2 Other Anabolic Agents	Ostarine, Ligandrol	Case ongoing at the time of finalizing the report
IC	AAF	S7. Narcotics	Morphine	Case ongoing at the time of finalizing the report
IC	AAF	S.1.1 Anabolic Agents	Methandienone Metabolites	ADRV