

## **WADA Audit Corrective Action Plan for UCI - International Cycling Union Introduction**

### **INTRODUCTION**

A full audit of International Cycling Union (UCI) was conducted in person on 3 and 4 November 2021 at the UCI's headquarter office in Aigle, Switzerland. The purpose of the audit was for WADA to work in a collaborative manner with UCI to assess its anti-doping program with the objective of providing assistance and guidance to UCI where any enhancements to its program were necessary under the World Anti-Doping Code (Code).

Therefore, the objective of this Corrective Action Report (CAR) and Corrective Action Plan (CAP) is to provide UCI with clear and helpful corrective actions to assist with the further development of its anti-doping program in a prioritized manner which is in line with the Code and the International Standards.

### **Background to the Audit**

The audit was proposed by WADA's internal Compliance Taskforce and endorsed by the Compliance Review Committee (CRC) based on the monitoring process outlined in the International Standard for Code Compliance by Signatories (ISCCS), specifically Articles 8.2.1 and 8.2.2. WADA notified UCI of the audit on 8 September 2021, and on 29 September 2021 UCI responded to the notification and audit dates were subsequently agreed upon.

To assist UCI with the audit preparations, the Lead Auditor communicated with UCI via email and on 30 September 2021 held a teleconference to discuss the objectives of the audit, the audit plan, logistical details, teleconferencing tools, etc. A draft audit plan was reviewed with UCI during this teleconference, then shared via email and finalized and formally issued on 30 September 2021.

### **Methodology**

To prepare for this audit, the audit team used data held by WADA, including in ADAMS and the legal database, as part of its review of UCI's anti-doping program. Furthermore, WADA requested that UCI provide a number of documents (i.e., Annex B of the Notification). UCI provided all documents as requested and this was extremely helpful to the audit team.

From the discussions and review of documents provided by UCI and ITA Cycling Unit ahead of the audit and during the audit, it was apparent that UCI and the ITA staff had prepared for the audit and were open in the discussions. Staff and documents were available to the audit team during the audit and this was greatly appreciated.

### **General Observations and Acknowledgements**

The audit team knowledge that 2021 has been a transition period for the ITA and former CADF's staff who are now part of the ITA's Cycling Unit since 1 January 2021.

While this audit report presents the findings raised by the audit team and the associated corrective actions, there are very few findings to report on. Given the quality of the antidoping program observed

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during this audit, the audit team wanted to highlight the numerous strengths of UCI as an organization and of its anti-doping program.

1. It is the view of the audit team that both UCI and ITA are highly functioning and performing with extremely competent, dedicated, and passionate staff. We observed a good working relationship between UCI and ITA staff which is supported by a comprehensive budget especially dedicated to road cyclist testing programs,

2. From a Testing perspective, the audit team noticed a comprehensive planning process in place but also in the implementation of an overall robust out-of-competition testing program especially for the higher risk discipline of road cycling, including Test Distribution Planning, Whereabouts, Athlete Biological Program (ABP), Sample Retention and Further Analysis, etc.). The audit team would like to highlight the PASS system which is used for: the monitoring of riders and for promptly providing information to the Testing or the Intelligence team (as appropriate) for follow-up, and/or by the ABP team when it is required to review ABP information, APMU recommendations, prepare athlete specific testing plans and as importantly, react quickly to ABP related information (e.g., adding a specific analysis on a sample already collected, planning follow-up target tests on an athlete, etc.).

3. From an Intelligence and Investigations perspective, the audit team notes the expertise and efficiency of the team in place with well-documented policies, procedures and processes. From what the audit team observed during the audit, it is clear the benefit on having easy access and good collaboration with the ITA intelligence & Investigation department when required for a specific project/investigation.

4. From an Education perspective, the audit team acknowledges the UCI's comprehensive education plan, from in-person trainings at international youth events, the use of athletes to assist with trainings, value-based education, to mandatory education sessions for competing athletes.

5. From a Therapeutic Use Exemption (TUE) perspective, the program is very well managed ensuring that operations are as efficient as possible and that all required timelines are implemented.

6. From a Results Management perspective, the program is sufficiently managed by both the Legal Anti-Doping Services of UCI (LADS) and the ITA. The audit team would like to highlight the collaboration between LADS and the ITA in relation to the results management process as a whole and the ease in which information is securely shared. The audit team also saw the benefits of each unit's tracking platforms that will assist both LADS and the ITA in meeting the new requirements of the 2021 Code and International Standard for Results Management.

7. From a data protection and privacy perspective, the UCI and ITA both have good processes in place for protecting the personal information and other sensitive data processed for each to carry out their anti-doping activities. The audit team would hope to see some of these processes documented in order to make their program stronger.

Finally, while this has been mentioned already, the audit team was impressed by the ingrained collaborative style it witnessed, as well as the proactive approach to the joint effort between the ITA and UCI staff. This collaborative approach seems to ensure that UCI 's processes and procedures are robust and that its program areas are overall comprehensive.

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The audit team sincerely thanks Mr. Simon Geinoz, Head of Legal Anti-Doping Services at UCI, Mr. Olivier Banuls, Head of Cycling Unit, ITA and Mr. Gianluca Siracusano, Head of Regulatory Compliance, ITA and their respective staff for their cooperation and engagement throughout the audit.

The audit team (and WADA) looks forward to assisting UCI with the implementation of the corrective actions listed in this report in accordance with the timeframes listed herein.

### **Limitations**

It should be noted that WADA compliance audits are technical in nature assessing the compliance of the Signatory with the World Anti-Doping Code and the International Standards and represent a snapshot in time, i.e., the compliance of the anti-doping program at the time of the audit. As such, WADA compliance audit reports include findings and corrective actions based on this precise snapshot in time and not on a longitudinal review of a Signatory's anti-doping program over time. It should also be noted that audits are only one element of the broader WADA compliance monitoring program.