

**INDEPENDENT AUDITORS REPORT**  
**RusAF Reinstatement Plan, Operation Roadmap and KPIs**

## NOTES TO AUDITORS<sup>1</sup>

- . The Audit Team’s remit are set out in the Terms of Reference approved by the Taskforce and which this framework and set of guidelines form part of. The above KPI indicators are guidelines for the auditors to follow, or to add new/subtract as they see fit. Each auditor is expected to submit to the Taskforce and Experts his or her individual table, but only one collective and consensual Final Audit Report is required. Special attention is to be paid to the issue of cultural change in Russian athletics, and opinion is required from each auditor if and what evidence there is of irreversible measures implemented and operating towards cultural change.
- . Any dissenting opinion on any aspect of the audit which cannot be resolved amongst the Auditors is to be annotated and explained in the Final Audit Report.
- . Each pillar of the operational roadmap (9 pillars), and within each pillar, each numerical point, must be evaluated by a pair of auditors, in any combination the Lead Auditor sees fit. No part of the audit should be overseen only by one person. However, the on-site independent facilitator can be utilized as the second person in the interests of quality control and efficiency, as required.
- . Remedial actions, if any, should be accompanied by a timescale for resolution together with an assessment of either “unconcerned/simple to resolve by dd/mm/yy”; or “unconcerned/complex to resolve by dd/mm/yy”; or “concerning/to be resolved by dd/mm/yy” or “serious/requires Taskforce immediate consultation before Auditor recommendation”.
- . An opinion is required from the team as a collective entity at the end of the Audit which together with the text-based report itself, will inform the Taskforce. The final opinion should be selected from:
  - RusAF has passed the Audit, there are no remedial actions.
  - RusAF has passed the Audit- any remedial actions are un concerning and will be easily fixed within a short timescale.
  - RusAF has passed the Audit- but must resolve remedial actions for final confirmation by dd/mm/yy.
  - RusAF has not passed the Audit - remedial actions must be resolved by dd/mm/yy to enable a further audit, or part thereof.

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<sup>1</sup> These notes to auditors are copied from the document titled ‘RusAF Audit Framework and Guidelines for Auditors’ as attached to the audit Terms of Reference approved by the Russia Taskforce on 20 September 2022.

- RusAF has not passed the Audit - remedial actions are to be referred to the Taskforce for further action.

The report covers all 9 pillars of the Reinstatement Plan, Operation Roadmap and KPIs. The scope of the audit is set out in the attached Terms of Reference as approved by the Taskforce. For convenience at the end of each paragraph of this Audit Report there is a reference to the corresponding KPI. Any text highlighted in blue are hyperlinks to online sources. This report is issued to the Taskforce only in accordance with the Terms of Reference and is without prejudice to the Taskforce's assessment of RusAF's progress against the Reinstatement Plan, Operation Roadmap and KPIs. The terms of engagement between World Athletics and individual auditors are not affected by this report and neither the Taskforce nor World Athletics waives any confidentiality or professional privilege in any work conducted by the Audit Team on the matters referenced in this report. In issuing (including any subsequent publication of this report) neither World Athletics, the Taskforce nor the Audit Team or their employees or consultants accepts any liability to RusAF, RusAF's officers or employees or any third party whether or not this report is issued, copied to or published to RusAF or anyone else.

## **1 GOVERNANCE AND ORGANIZATIONAL STRUCTURE**

1.1. Sport is centrally governed by the Ministry of Sports of the Russian Federation, and regulated under the Federal Law on Physical Culture and Sport in the Russian Federation (hereinafter – the Law). Functions, rights, and obligations of each National Sport Federations are defined in the Law. This Audit was conducted with a view to the Law and the Federal Regional Policy. RusAF's Charter was adopted on November 9<sup>th</sup>, 2018. Amendments of the Charter are drafted and submitted, but remain in line with the Ministry of Sport's requirements, and can be accepted only when the Elected President returns to his duties (December 2022). At present stakeholders can comment on Charter amendments by reporting to RusAF.

The amendments of the charter are related to both technical clarifications and the strengthening of the anti-doping, ethical and integrity policy, as RusAF General Secretary explained “We realized that we need to change the charter, not only because we need to add two or three paragraphs, but because we need to make this document more balanced, it must be modern, give all parties involved guarantees of normal work and development”:

- „4.11. Membership may be suspended, or a member of the RusAF may be expelled from RusAF by the Presidium on the following grounds: 4.11.5. Persistent violation of anti-doping legislation by Athletes, Athlete Support Personnel and/or other Persons.”
- President of RusAF “in order to improve the ethical culture and to prevent violations of ethical standard of conduct, the President of RusAF appoints an Ethics Officer of RusAF”.
- Provisions related to establishment and operation of Athletes commission (see point 3.2 ), Disciplinary Commission (see point .4.4).

International experts, Ministry of Justice of Russian Federation and leaders of RusAF contributed to the draft of Charter. (KPI 1.1.10; 1.7.3-1.7.4)

1.2. RusAF passed the Ministry of Sports’ accreditation process to be registered as an organization developing the sport of athletics. Accreditation is valid 01/03/2022 – 01/03/2025. RusAF has 77 members (regional athletic federations). According to the Law, the function of developing the sport is divided between federal and regional state structures, as well as between federal and regional sports federations. RusAF’s main activities consist of organizing competitions at the federal level (despite the international sanctions, RusAF organizes *around 85 competitions* (federal level) per year; the total number of competitions planned for 2023 is (in country) – 241). Regional federations operate on a voluntary basis, the level of development of athletics differs from region to region. RusAF stresses the importance of keeping tight contact with regions, “especially those that play an significant role in preparing the reserve for the national team of the country.” Re-accreditation procedure is held by The Federations Accreditation Commission (“the Commission”), every 4 years. The Commission evaluates the implementation of sports development program (in RusAF case - Athletics development program) and decides whether to extend the accreditation. If the Commission lacks evidence that the program was properly implemented, federation activities might be terminated (or suspended) and its rights transferred to another All-Russian Sports Federation in the relevant sport or sports for which there is no accredited All-Russian Sports Federation. (KPI 1.2.6-1.2.7)

1.3. RusAF’s budget consists of three parts: i. State funding, ii. Sponsorship income and iii. own income. State funding covers the costs of national and regional sports centres, where athletes are trained. These costs are paid directly by the Ministry of Sports to the regional sport structures. RusAF does not control or influence in any way this State funding. The State budget allocated by Ministry of Sports is controlled

according to the State requirements. In 2021, RusAF organized an external independent financial audit of its sponsorship and own income for the first time and the opinion of audit was, that the annual financial report “presented fairly in all material respects in accordance with the rules for compiling accounting (financial) reporting established in the Russian Federation.”. State budget is allocated according to the requirements of the RusAF, but Ministry of Sports has expressed its requirement that National Federations need to earn more from marketing and become more financially independent. RusAF’s organizational structure reflects this desire through the establishment of a marketing division. According to RusAF – the State allocated budget is adequate, with a reported margin for increase by the Ministry of Sports where needed. Beyond reinstatement, further and larger-scale initiatives under the principles and framework laid out in the reinstatement roadmap may require an increase of RusAF’s budget. It is important that RusAF assures its sustainability by gradually becoming financially independent and attracts and develops additional funding sources. (KPI 1.1.10; 2.4.5; 4.2.6).

1.4. New RusAF staff recruited since 17/08/2020. RusAF has established and maintained an active recruiting process. The General Secretary worked at RusAF between 2015-2019, he left because he did not agree with the management's decisions. The same General Secretary was asked to return to help rebuild RusAF. The recruitment procedure is in accordance with RusAF’s internal labour regulations, but the main rules are in the Labour Code of Russian Federation and some exceptional regulations, related to anti-doping requirements, indicated in the Law. The Labour Code establishes a finite list of documents that the candidate submits to the employer. With the help of RUSADA, during the recruitment process, RusAF checks if the candidate is subject to any sanction in relation to any ADRV. Post hire of a new person, RusAF conducts training on core values, Ethics Code, fight against doping and internal procedures. Training records were produced during the Audit and are available. All staff members have passed the mandatory anti-doping and ethics courses as part of their onboarding programme at RusAF. Since 2020, staff retention at RusAF has been approximately 90%. Stability of staff shows a common understanding and support of the National Federation strategic goals and core values. From interviews with staff, financial motivation is adequate, with salaries on par with similar organizations and paid on time. The Audit Team recommends that RusAF enhances the current vetting process, if it is allowed according to the Labour Code. RusAF could follow World Athletics approach and elevate the process to achieve the highest possible standards to represent best practice (KPI 1.1.10; 1.2.7; 1.3.8; 1.4.13; 4.1.8).

1.5. Office work is well organized. The Internet website <https://rusathletics.info/> provides most of the information on the National Federation's mandate and activities, its commissions / committees, with minutes and decisions of the meetings publicly announced. (KPI 1.2.6)

1.6. Athletes and coaches have labour contracts with the Russian Centres for Sports Preparation. Employers of the athletes and coaches are regional or federal athletes' preparation centres. Labour contracts are regulated according to the Law and Labour Code of the Russian Federation. RusAF has a limited influence on how coaching is structured and delivered, but it actively involved in anti-doping education and can rely on good will and mutual understanding of the regional organizations and coaches to further spread anti-doping and ethical principles and information. (KPI 1.2.22)

1.7. Leadership is a very important aspect in the Russian culture. The elections for a new President were held on 30<sup>th</sup> November, 2020 and Mr. P.Ivanov, was elected as the new President for a term of 4 years. Mr. Ivanov is acquainted with sports in the Russian Federation, because of his previous experience working as president of the Russian Triathlon Federation. After the Court of Arbitration for Sport's decision in WADA v. Russian Anti-Doping Agency (RUSADA) (CAS 2020/O/6689) on 17 December 2020, Mr. Ivanov, due to his role as a government official as the Deputy Head of the Federal Anti-Monopoly, was required to step back as President of RusAF until 17 December 2022. Elected Vice-President Mrs. Irina Privalova became the Acting President of RusAF. Acting-President Privalova is also head coach of the national team. Acting-President Privalova is a respected former athlete, she is a public figure dedicated to the sport of athletics, who has worked towards a change of culture and zero tolerance to doping and other ethical and integrity related matters. New Presidium was elected together with the president in November 2020. All members of Presidium signed declarations on acceptance of anti-doping rules violation responsibility. (KPI 1.6.3; 1.7.3 – 1.7.4)

1.8. In the interviews with the Audit Team Mr. Ivanov expressed his dedication to fair play, modern management of RusAF and also a commitment towards changes of culture and zero tolerance to doping and other ethical and integrity related matters. (KPI 1.7.3 – 1.7.4).

## **2 CHANGE RUSSIAN ATHLETICS**

2.1. Athletics is one of the biggest sports in the Russian Federation. Some disciplines are becoming more and more popular (e.g. National Running Movement <https://run-rus.com/>). During all the interviews the Audit Team found a positive attitude towards change. RusAF staff and

other active representatives from the athletics and sport community confirmed increase in numbers of people who have zero tolerance to doping, expressed the same vision, values and goals to achieve a level-playing field and clean sport in Russia.

2.2. In 2020, with the presidential election, RusAF began rebuilding its structure, systems, and processes from “scratch”. Most of the documents, which the organization were developing, have now been adopted and most of them include anti-doping or other sport ethics and integrity norms of protection (The Law; Coaches’ employment contract drafted according to the Labour Law); Athletes employment contract (drafted according to the Labour Law); Anti-Corruption Policy; Code of Ethics; Conflict of Interest Policy; Disciplinary Code; External Communication Policy; Gifts and Hospitality Policy; Internal Investigation procedures;); RusAF anti-doping strategy 2021 -2025; RusAF education strategy 2021-2023). Athletics development program (until 2024) is one of the main documents, a basic requirement to receive State funding and from which it is clear that RusAF understands the situation and the need for change “The moments of corruption, and as a result – the achievement of victory at any cost – led to an increase in violations of the Anti-Doping Rules, ignoring the most important postulates of the WAD Code not only by athletes and coaches, but also by the functionaries of the Russian national team and the leadership of the RusAF.” (KPI 2.1.22)

2.3. All athletes, participating in a competition, must present their certificate issued by RUSADA, EA (I Run Clean) or WADA (AdEL) on anti-doping education. Each RUSADA certificate has a unique QR code. Each athlete is registered for the competition via United RusAF information system (hereinafter – UIS). The certificates are uploaded to this system as well. Whenever due to technical problems it is not possible to upload certificates then they are sent by e-mail, or by other means. RusAF liaises with RUSADA to verify the authenticity of the certificates. The same system works for coaches too, all coaches upload their certificates via UIS. No athlete or coach is allowed to participate in a competition without a valid anti-doping education certificate. (KPI 2.1.22; 2.1.26; 2.1.27)

2.4. Code of Ethics is exceptional in that it addresses all relevant matters and is intentionally written in the first person in simple and understandable language. The language used by RusAF is indicative of them ensuring that ethical matters are explained in the most simple and accessible way. (KPI 2.1.25)

2.5. RusAF’s website provides two different online reporting channels. One is to report doping matters, and any information submitted via the webform is automatically directed to RUSADA, with no access whatsoever at RusAF. The second reporting channel is to report all other

sport integrity matters to RusAF. These are handled by the Ethics Officer and either shared with the relevant internal department for follow-up or referred to the Disciplinary Committee for evaluation of the evidence according to the procedure laid out in the Disciplinary Code. The number of reports is increasing. Since the integrity hotline being established in 2022, so far, 14 reports were submitted to RusAF, of which 4 are anonymous (see point 4.5). This is an example of RusAF rebuilding trust with its athletics community, but the Audit Team is of the opinion that increasing the visibility and attractivity of these two reporting channels will encourage reporting even further. (KPI 1.2.7; 1.4.13; 1.4.15)

2.6. As stated in point 1.2, RusAF members – 77 regional federations that are non-governmental organizations, where staff works on a voluntary basis. With a goal to rate regions regarding their level of education and support in relation to RusAF’s anti-doping policy, to motivate them to meet expectations, and monitor this progress, RusAF has created an anti-doping regional rating system. All regions are classified into one of three ratings (green – most satisfactory, yellow – satisfactory; red – unsatisfactory) according to anti-doping policy-related criteria (see point 4.7). For regions where athletics is a popular sport, relations with RusAF are tighter. These regions have all the necessary sport infrastructures to allow for the organization of competitions. To increase the number of regional federations that meet the criteria to move from the red to the yellow, and eventually green, zone, RusAF should provide additional mentorship to these regions “Unfortunately, in previous years, the leaders of the Federation, members of the Presidium, members of the chief coaching council did not often travel to the regions, especially those that play an insignificant role in preparing the reserve for the national team of the country. Directly human contact of the leaders of the RusAF, the main coaching staff with regional leaders occurs once a year - during the days of the All-Russian Conference and occasionally - at competitions. This is clearly not enough for full-fledged anti-doping work, for working with personnel and promoting new ideas and sports technologies, for the development of our sport.” (Athletics development programme). (KPI 2.1.23; 2.2.5)

2.7. In the summer of 2022, RusAF initiated a sociological survey of the opinions of track and field athletes regarding their perception of doping, attitudes towards clean sport and fair competition. The study was conducted in three Russian cities – Cheboksary, Kazan, Novogorsk. In total, 106 athletes participated in the study (professional level track and field athlete, aged 18 to 40 years, representing 7 different disciplines of athletics). The survey found “All focus group respondents were equally aware of the possibility to report ADR violations through official channels, but all had different preferences. The younger athletes prefer to report to the coach, while the older ones believe that it is a matter of their personal



responsibility and respect for sport ethics. Categorical judgments about the determination to report ADR violations increase with athletic experience.” The Audit Team supports the suggestion raised by survey respondents to improve the existing anti-doping education program, especially paying more attention to the education of athletes support personnel (for example medical or psychotherapists). This kind of survey could be expanded in numbers or cities and incorporate more athletes, also coaches and other athlete support personnel to have a broader and more accurate overview. This would ultimately help RusAF assess where additional educational efforts are needed and be focussed. The Audit Team is of the view that repeating this kind of survey (with adequate changes still possible to compare data from year to year) on a regular basis might help monitoring the clean sport dynamics it has observed during this Audit. (KPI 1.5.7; 2.3.10)

2.8. RusAF, with the help of RUSADA, organizes various educational events: in-person and web-based seminars, outreach campaigns and individual sessions where needed. The shared information meets the requirements of WADA. In all the documents (see point 2.2), there are certain parts dedicated to anti-doping and protection of sport ethics and integrity. All the RusAF departments and most employees have responsibilities related to the implementation of the documents and their content. For the next phase of the development of the organization, the Audit Team suggests harmonizing all anti-doping and ethics and integrity regulations with educational activities. Educational initiatives would benefit from the hiring of an education specialist to streamline and improve the program and its delivery. An education department could be established at RusAF, with the specialist reviewing all the current material and initiatives to make the educational program on anti-doping and ethical and integrity matters more attractive, more widely distributed and more impactful altogether. (KPI 1.4.14)

2.9. The change of sport culture in Russia should be not only encouraged, but also actively fostered under the mentorship of sport bodies. Unfortunately, an instrument of measuring cultural change and effectiveness of anti-doping policies has not yet been implemented by World Athletics or WADA. WADA Code compliance procedures ensure data collection on obligatory instruments and documents, but evaluation of cultural change needs a different instrument. Also, ADRV metrics only tell part of the story, and from a broader perspective, such cultural change instrument could be applied not only in Russia, but across sporting bodies on a global scale. All separate activities, which RusAF is taking and implementing, can be considered as evidence of the sport culture change in Russia. Legal and strategic documents, which are drafted and accepted by RusAF and the Ministry of Sport itself is the beginning of change in the leadership: Charter of RusAF (as referred to at point 1.1). Athletics

development program transfers the provisions of reinstatement plan to the national level and these KPI's are included into this programme (for example: Using the capabilities of the Unified Information System to ensure anti-doping work in Russian athletics; obligatory education on anti-doping for athletes, coaches, and judges; establishment of anti-doping division in RusAF).

2.10. The period of audit – October 2022, unfortunately didn't allow the Audit Team to evaluate RusAF international leadership, because of the political situation in the Russian Federation and sanctions which are imposed on the State by the international community. However, RusAF staff have ensured that informal relations have been kept with several countries. The Audit Team is unable to express assurance on international leadership of RusAF as the current situation does not allow RusAF to be active internationally at all. It would be more reasonable to assess international status of RusAF at the end of the post-compliance Monitoring & Evaluation period.

### **3 STAKEHOLDER ENGAGEMENT**

3.1. The Ministry of Sport (Minsport) *is a federal executive body responsible for drafting and implementing the governmental policy and legal regulation in physical fitness and sport, providing State services (including anti-doping measures), and managing State-owned physical fitness and sport facilities.* Sport in the Russian Federation is governed by the Law in a centralized manner: most of the relations of the subject participating in sport are regulated by the Law. The Minsport funds sports and according to the received information – funding for athletics is adequate. RusAF has operational independence, Minsport does not interfere in the sport development strategy. The Law regulates which activities are covered by State and which – by the National Federation. RusAF, according to the Law, is obliged to present its athletics development program to the Minsport. The current program was approved by Minister of Sport in 2021 and is valid until 2024. The program itself is dedicated to “the change of culture”: “It should be noted that the information presented over the past four years does not contain an in-depth analysis of the implementation of the previous program in connection with the change of leadership, sanctions, forced elections of executive bodies. Therefore, the work begins with a “clean page””. Russia (RusAF and Minsport) understands the causes of the current situation, its consequences in both the short-term and long-term perspective, and accepts the need for change. The Audit Team met with Deputy Minister of Sport A. Morozov, responsible for development of sports in the country. The Deputy Minister demonstrated a very deep knowledge in the management of sport and

sport itself and expressed support to RusAF. The Deputy Minister provided his assurance that Minsport is supporting reinstatement process with its resources. (KPI 2.1.24; 3.1.8; 3.2.8)

3.2. Athletics is a big sport (individual) in the Russian Federation (National team (with reserve) consists of approx. 1000 members), in 2019 there were around 1 800 000 athletes (including kids and masters). “In order to strengthen ties and improve interaction between RusAF and athletes”, In February 2022, RusAF established a permanent Athletes Commission. The tasks of the Athletes Commission are: protect athletes rights and represent their interests; cooperate with commission of regions and RusAF; promote the creation of regional athletes commissions; and contribute to the fight against doping in sports, as well as against any form of discrimination, violence and unethical behaviour in sports. Provisions on Athletes are included into the amendments of RusAF Charter. The communication between the Athletes Commission members and RusAF staff is both formal and informal. Athletes are becoming more interested in RusAF’s work, but their main interest concerns an individual-financial aspect (e.g. payment of prize money). There is space for more active involvement of the athletes in re-establishing RusAF’s reputation and for spreading fair play values. (KPI 2.1.26; 2.1.22)

3.3. According to the statistics, in 2021 there were approx. 2800 coaches in athletics (age up to 35 – 591; over age 64 – 569). Number of coaches is decreasing since 2015. As mentioned above, to become a coach completion of an “appropriate education (secondary-professional or higher)” and a Coach education program that includes a module on anti-doping is mandatory. RUSADA, EA (I Run Clean) or WADA (AdEL) training certificate for coaches is obligatory and must be presented by athletes and coaches upon registration to a competition to be able to participate. Coaches are employed by regional sport training centres and local sport schools, not RusAF. A coach’s salary at their regional sport training centre depends on the athletes’ results, but if an athlete is sanctioned for an ADRV, the coach’s financial status is negatively affected. For the most part, regional federations are led by active coaches in the regions. The Coaches board is established in the National Federation (new statute of the Board was accepted in December 2021). Most of the activities of the Board are related to the composition of the national team and training of the national team. (KPI 2.3.8 – 2.3.10).

3.4. Regional federations – 77 members of RusAF have different level of development of athletics, and a different level of activity. As stated above – regional federations are non-governmental organizations, where most staff work on a voluntary basis. According to the Law, “the

relevant executive authority of the constituent entity of the Russian Federation shall accredit only one regional sports federation for one sport on the territory of a constituent entity of the Russian Federation”. The main activity of the regional federations – organize and conduct competitions and address other organizational matters (e.g. awarding proper ‘classification levels’ to the athletes based on the results achieved). Since mid-2021, RusAF has introduced regional anti-doping rating (it consists of 10 criteria) (see point 4.7 for more on rating). First results of the rating were published in December 2021 and updated again in August 2022. The Audit Team suggests in the future to improve the rating system (add new criteria related to ethics and integrity) and to use it more actively as an instrument to foster engagement and changes in regions. (KPI 2.2.5 – 2.2.6)

3.5. RusAF and RUSADA cooperation is very active. Organizations have agreements on cooperation (to provide grounds for information exchange etc. in addition to the obligations of each party under the Law and All-Russian Anti-Doping Rules), provide services and agenting (for contract testing to supplement RUSADA own testing program in athletics, there are 2 agreements, mostly for tax / legal purposes). Education activities are held in a co-operative manner, informal communication is permanent, and collaboration is tight. Of all national sport organisations in Russia, RUSADA considers RusAF to be the leader in the fight against doping and an example of implementation of an anti-doping policy at the national level. RUSADA has invited RusAF to share good practices at seminars with other national sport organization despite RusAF not being reinstated as a member of World Athletics yet. (KPI 2.1.28)

#### **4 ANTI-DOPING AND INTEGRITY**

4.1. RusAF created its anti-doping, ethics and integrity program from scratch. During the last few years, not only new documents were drafted and accepted, but also new staff and new governance of the federation were elected/appointed. The anti-doping system is more established and embedded than the ethics and integrity system, because of the solid basis and framework offered with the WADA international standards and guidelines that RusAF can rely on. Sport ethical and integrity matters are a newer avenue for the Federation but they are well-equipped and staffed with the Ethics and Integrity & Anti-Doping Departments strengthening this area. RusAF manages to attract and effectively recruit staff from the private sector with a rich culture of ethics and compliance. The Audit Team believes such efforts of RusAF will make it a leader in ethical and integrity matters in the Russian sport world, which starts at the National Federation itself, making sure that they lead by example. (KPI 4.1.7)

4.2. RusAF has established an Anti-doping and Medicine Commission which is responsible for “advanced training of medical personnel, coaches and specialists working with candidates for the sports teams of the RusAF, as well as with candidates”. While studying at the high schools, coaches and sport medicine representatives have obligatory education on anti-doping. The Audit Team suggests expanding education and onboarding of the athlete support personnel more actively (sport doctors, physiotherapists, massagers).

4.3. The Ethics Officer position was established in March 2021. Ethical and integrity matters, as it is presented in the RusAF documents, are rather new for a public organization: Anti-Corruption Policy, Conflict of Interest Policy, External Communication Policy, Gifts and Hospitality Policy, Hot-line policy. RusAF’s ethics and integrity education is designed to be as simple as possible and takes a short period of time to ensure that the take-home messages are well-understood, and that the audience remains attentive during the sessions. Participation should be further bolstered with the support of an education specialist to extend the reach. (KPI 2.1.22; 2.1.26)

4.4. The Disciplinary Code was accepted in September 2022 and a Disciplinary Commission was set up. The Disciplinary Commission has already considered 7 cases. The Chair of the Disciplinary Commission Mrs. E.K. (lawyer with a broad experience of working at international companies) demonstrated a very deep understanding of ethics and compliance matters during the interview. Her experience and personal qualities impressed the Audit Team and reassured that the Disciplinary Commission would pursue any matter vigorously under her leadership. The Disciplinary Code covers a range of offenses related to integrity matters, including retaliation against those who reported a violation and failure to report a violation, and the Disciplinary Committee starts its meeting with decision whenever or not a violation fall under their competence or not. One example provided to the Audit Team included an athlete insulting a member of the DCO team which arrived to test him/her. The case further reinforces the message that RusAF will not tolerate any attempts to undermine the anti-doping rules. (KPI 1.5.7 - 1.5.8; 2.2.6)

4.5. To report any known or suspected anti-doping or integrity violation, RusAF internet website provides two different online reporting channels: one channel is for anti-doping rule violations – any information can be submitted via a webform and the reports are automatically directed to RUSADA, with no access whatsoever at RusAF; the second channel is for all other sport integrity – another “general” hotline where any information can also be submitted via a webform then handled by the Ethics Officer. The Ethics Officer either shares the information with the relevant internal department for follow-up, or refers it to the Disciplinary Committee for evaluation of evidence and awarding a decision according

to the procedure laid out in the Disciplinary Code. According to the statistics, in 2022 (until October), there were 14 reports (4 of them – anonymous): 4 of them “Confidentiality and Data Privacy” (including falsification of data), 4 – Respect and diversity, 2 – Our reputation, 1 – Anti-bribery and corruption, 1 - Conflict of interest, 2 – “others”. 2 reports are still under the investigation (at the time of audit); for 2 of them remedial actions were recommended, 3 of them were reviewed by Disciplinary Commission. In some instances, confidential sources report on doping via the “general” hotline rather than the anti-doping one. For such cases, the Audit Team would recommend that RusAF defines more comprehensively the protocol for the transfer of information with RUSADA, which should be secure and timely. The Audit Team believes that the “Hotline and whistleblower protection” policy could be more specific about protection from retaliation against whistle-blowers, data protection and confidentiality. (KPI 4.1.8; 4.5.3)

4.6. RUSADA is testing actively in athletics. There are 164 athletes in RUSADA RTP, and 290 athletes in extended testing pool. RUSADA conducts risk assessment in full compliance with the International Standards for Testing & Investigations. Under the Risk Assessment, Athletics is assigned the highest possible risk category (5) based on the physiology of sports and history of anti-doping rules violation. Top national level athletes are closely monitored on individual basis. RUSADA conducts 60% to 80% of its test out-of-competition (depending on sports calendar in a given sport and number of important national competition each year), including testing at centralized training camps and testing of athletes included in RUSADA registered and extended testing pools at their specified whereabouts. RUSADA closely monitors athletes’ whereabouts information and had arranged target testing of athletes training at remote location, including tests in Kyrgyzstan and Kenya. RUSADA routinely conducts target testing based on whistleblower reports and follows up on other reports on potential ADRVs, including accusations of violations of the prohibition against participation during the period of ineligibility and suspected prohibited association. RUSADA sends samples to different WADA-accredited labs (Ankara, Gent and Seibersdorf). The number of ADRV for the last 3 years are quite stable and comparable to World Athletics’ statistics published on an annual basis by WADA for all sports.

RUSADA statistics, including number of all samples collected under RUSADA Testing Authority in Athletics in years 2020-2022 and ADRV's registered in the same period								
Period	Samples					ADRV		FF/MT
	Urine	Blood	Total	ABP blood	Grand Total	Analytical	Other	
2020	1646	122	1768	538	2306	21	1	39
2021	1592	68	1660	436	2096	15	3	38
2022 (on 20/10/2022)	1583	47	1630	423	2053	12	1	81

Number of samples includes tests conducted by the contract with event organizers or national federation, e.g. in 2021 based on agreement with RusAF there were 38 samples collected, in 2022 – 67. The recent increase in number of registered cases of Failing failure/Missed test reflects the strengthening of RusAF control over the accuracy of filling of whereabouts information by the athletes in RUSADA testing pools. In addition to reports of potential use of prohibited substances, RUSADA also mentioned that they receive reports on potential prohibited association with banned coaches as well as violations of ineligibility restrictions, which further support as a cultural shift. RUSADA annual report is available on the website. (KPI 2.1.28; 2.4.5)

4.7. RusAF regional anti-doping rating consist of 10 criteria: 1) there is a person responsible for anti-doping support; 2) Responsible person has passed advanced training; 3) Possession of a certificate of completion of the online course IrunClean, AdEL, Triagonal (for athletes and staff of athletes participating in RusAF events); 4) The presence on the official page of the "Anti-Doping" section with relevant documents or a link to the "Anti-Doping" section of RusAF/RUSADA; 5) The Regional federations have an anti-doping education plan agreed with RusAF; 6) Absence among the members of the regional federation of persons serving a ban for anti-doping rule violations; 7) Report on the anti-doping activities of the regional federation; 8) Violations of the ADRV by the athletes of the region (no more than 2% of the number of athletes participating in RusAF events); 9. Violations of the ATP by the personnel of an athlete in the region (no more than 2% of the number of personnel of athletes participating in ARAF ETUC events); 10) The leadership/representatives of the federation have been trained in the RusAF Code of Ethics. Information is selected from regions (send official letters), if region is not providing certain information – this criteria is evaluated as “-“

it means the criteria is unfulfilled and the region receives '0' point. If the criteria is fulfilled – regions receives '1' point, all criteria has the same value:

- Most of the regions' leaders have passed training on ethics and integrity – 52 regions;
- 53 regions have person responsible for anti-doping (employed by regional ministry of sport or regional athletic federation);
- 43 regions have links in their internet site to the "Anti-Doping" section of RusAF/RUSADA;
- 28 regions have education plan coordinated with RusAF.

In the March 2021 – 28 regions where in red zone; in August 2022 – 21.

With a goal to mentor regions and foster change of the culture, the Audit Team suggests elaborating RusAF regional development (anti-doping, ethics and integrity) policy: set goals related to the cultural change in regions (set different goals to regions which are in yellow, and in red zone, according to the rating), elaborate certain good practice activities examples, publicly provide information on changes. The Audit Team suggests expanding (or change some of criteria, which are already implemented by majority of regions) the criteria including more relating to integrity. This kind of activities, and active mentorship from RusAF, would allow regions to sense a leadership and accept the changes more positively. (KPI 2.1.22; 2.1.25; 2.2.5; 4.3.7).

## **5 EDUCATION AND PREVENTION**

5.1. As it was stated above, anti-doping and ethics and integrity policies are covered in different documents on different scopes. Cooperation with RUSADA is permanent as to provide correct, up-to-date and accessible information to educate the athletics community on anti-doping matters. RusAF is also reminding the athletes of their obligations towards anti-doping on a regular basis, including for instance the duty for RUSADA RTP athletes to fill in and update their whereabouts, which supports RUSADA in their activities and adds an element of prevention. On a side note, there is a requirement for additional testing on neutral athletes as part of the criteria to compete in international competitions. Over the last 12 months, RusAF stated they paid 40K USD to RUSADA and 47K USD to the Athletics Integrity Unit for these tests to be conducted, a



positive sign of support to testing efforts that further enhance doping deterrence. Nevertheless, to expand education and prevention activities has its own challenges in a Federal State due to the size of the country and its different time zones, big numbers of athletes and events, etc. but also with challenges as practical as the different level of computer literacy across the athletics population.

5.2. As mentioned earlier in this Audit Report, each athlete is registered for the competition via United RusAF information system. The anti-doping education certificates are uploaded to this system as well. There are 108 822 persons in the system in total (together with kids and athletes who have ended the athlete career). To date, there are 13216 active athletes, who participate in the competition in 2021 – 2022, and all of them have passed anti-doping education, as well as 2991 coaches and 812 sport judges. (KPI 2.3.10; 3.2.9; 5.1.7)

5.3. Anti-doping education can be obtained during professional training programs in the direction of physical culture in accordance with the Federal State Educational Standard (e.g. anti-doping specialists, coach, instructor, sports judge, management of organizations). RusAF has provided to RUSADA its Anti-doping educational Strategy 2021 – 2025 and annually provides strategy implementation plans. Employees of RusAF Integrity and Anti-doping department have successfully completed RUSADA scientific-methodological workshop and have been certified to deliver anti-doping education programs in their sport in accordance with the All-Russian Anti-Doping Rules. According to the 2021 statistics, there were 43 events planned (seminars, webinars, outreach) in which around 1000 participants took part. A similar number was planned for 2022. Some of the activities re held together with the high education institutions ( Most of the educational activities are planned for professional athletes and their support personnel, but there is space for improvement with educational events to amateurs: for example, The National Running Movement <https://run-rus.com/>, which is RusAF project, and for November 2022, has already involved 300 000 participants in all Russia, could have certain information dedicated to clean sport or/and links to educational platforms. (KPI 2.3.8;2.3.10; 4.4.6; 5.1.7; 5.2.7)

5.4. An anti-doping topic is included into the various coaches advanced training courses, which is organized together with the high schools. For example: coach course was held recently (beginning of November), 45 participants from 27 regions took part in the course. According to the programme next to the topics related to coaching methodology there was part dedicated to “fight against doping in athletics”. (KPI 2.3.10)

## 6 COMMUNICATIONS

6.1. Communication is one of the most important aspects in the development of an organization and the sport it governs. For RusAF, active and transparent communication on their structure, activities, initiatives, regulations, and core values is vital to rebuild trust with its community, both nationally and internationally, and to boost the change of culture. At national level, communication with Russian media is regular and transparent, with RusAF having highlighted that this is fundamental to regain and sustain trust. They employ 2 persons fully dedicated to communication. They manage different communication channels that includes RusAF's website and profiles on social media platforms (Instagram - 33,5 K followers; Wkontake – 36,7 K followers; Telegram – 6 K, Youtube – 13,6 K). As it was stated above (see point 5.1), while on the rise, computer literacy is not consistent across the whole athletics community, but despite this fact, the numbers of followers and the engagement on social medial platforms are growing rapidly. The content shared via these channels is very varied to keep the community informed on all important matters, with a certain regularity on anti-doping and ethics and integrity topics. Different target groups use different social media platforms, and the communication staff is making sure to adapt the content to increase the audience and engagement. In addition, they work with a graphic designer to make their posts more attractive. Representatives of athletes stressed that regular reminders from the communication department on social medial channels to fill in the whereabouts on ADAMS is very useful for instance. (KPI 2.1.25; 4.6.3; 6.1.7; 6.2.5)

6.2. RusAF's website is clear, information is easy to find. Most of the documents (strategies, politics, decisions of ministers, decisions of committees and commissions, etc) are public and therefore available to the whole community. Key competitions (Senior and Junior National Championships and some others) are broadcasted either on TV or online. (KPI 2.1.25; 4.6.3)

6.3. RusAF fully complies with the requirement of federation website anti-doping section: section "Anti-Doping" on RusAF website is easily accessible; all necessary documents are published; relevant RUSADA leaflets for athletes and ASP are published; links to [list.rusada.ru](http://list.rusada.ru) service and RUSADA educational online-courses are available. (KPI 2.1.25; 6.1.7; 6.2.5)

6.4. RusAF restarted printing the Magazine of athletics (for the first time it was published in 1955). The magazine also contains information on anti-doping, and this media provides an additional possibility to actively spread information and the core values of sport integrity

and anti-doping. For the Audit Team, it was clear that RusAF is looking at delivering the message to all target audiences in the most efficient way as to further enhance change of culture efforts, and the growth of engagement statistics is a positive sign. (KPI 1.7.4; 2.1.25)

6.5. Athletes are joining various communication campaigns: mid distance runner E.Nikolajev became RUSADA ambassador of clean sport, M.Lasickene (one of the most popular athletes, is demonstrating zero tolerance to doping) became RusAF's candidates for the national award in the field of physical culture and sports "Pride of Russia". (KPI 2.1.22)

## **7 INTERNATIONAL ENGAGEMENT**

7.1. RusAF Strategic Plan and Operational Roadmap are published on the internet site. The Taskforce's International Experts are working with RusAF on a daily basis, with the goal to implement the Operational Roadmap and associated KPIs. During the interviews it was clear that insights and mentoring by the International Experts was very valuable and helped RusAF to choose most appropriate solutions (for example: with the consulting International Experts, RusAF made a research on code of conduct and selected a very successful for RusAF example). RusAF General Secretary and Ethics Officer are providing regular reports to the Taskforce. (KPI 3.2.8)

7.2. RusAF openly states in the athletic development programme, that:

- the five-year suspension of RusAF's membership of World Athletics has caused the absolute majority of the members of the national team to be unable to participate in international competitions; as a result, motivation for classes is lost, sports results decrease, many stars end their careers prematurely; almost complete lack of communication with the international athletics community (again, a direct consequence of the five-year suspension of RusAF's membership of World Athletics);
- due to the lack of medals at international competitions in several regions of Russia, the attention of authorities to the support and development of athletics is decreasing, funding for the training of athletes is decreasing;
- Compared to other countries results, Russian athletes' performance gap is growing.

7.3. The period of audit – October 2022, unfortunately didn't allow audit team to evaluate RusAF international engagement, however it

would be more reasonable to assess international status of RusAF at the end of post-compliance Monitoring & Evaluation period. (KPI 3.2.9)

## **8 INTERNAL ADMINISTRATION**

8.1. The anti-doping crisis brought positive aspects to internal administration of RusAF “work has begun on the creation of a sustainable governance of the RusAF, excluding the possibility of a repetition of doping crises” ( Athletic development programme). (KPI 8.1.8)

8.2. RusAF organizational structure meets the organization development strategy. Every employee has their own job description, and it is important to mention that Labour Code in the Russian Federation is strict, it is difficult to require procedures that are not established by law. RusAF adopted certain documents, which help to ensure employees social security, protection and motivation: the procedure for the protection of personal data of employees, procedure for awarding employee bonuses. Information on health and safety of the working places is announced publicly (Workplace safety inspection). (KPI 8.1.8)

8.3. All the ethics and integrity requirements and policies are applied first to RusAF staff, and they are obliged to have ethics and integrity course while onboarding RusAF. This procedure is not unique, but it is exceptional between other sports federations not only in Russia but also in other countries. (KPI 1.4.15; 3.2.7; 8.1.8)

## **9 AUDIT, MONITORING AND EVALUATION**

9.1. During the audit period<sup>2</sup> the Audit Team held 11 meetings. Information to the Audit Team was provided in a collaborative and cooperative manner, as well as requested additional information following interviews. Meetings were held in English and some of them – in English and Russian, RusAF arranged interpretation. Most of procedures, policies and other information are available on RusAF’s website.

9.2. According to the Framework and Guidelines for auditors “The above KPI indicators are guidelines for the auditors to follow, or to add new/subtract as they see fit. Each auditor is expected to submit to the Taskforce and Experts his or her individual table, ***but only one collective***

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<sup>2</sup> The audit started on Friday 07 October.

*and consensual Final Audit Report is required.”*. This Audit Report is presented as a common opinion, there were no separate or dissenting opinions any individual auditor.

9.3. In the Audit Team’s opinion the output of the Audit is that RusAF has passed the Audit as defined and mandated in the Terms of Reference. The Audit Team identifies 13 findings: 2 major for which remedial action is required and 11 minor classified as recommendations, but these findings do not compromise the positive opinion that RusAF have passed the Audit. RusAF must report of implementation of remedial actions by sending the relevant information to Audit Team by the dates indicated below. (KPI 1.8.3)

## **AUDITORS’ OPINION**

### **In the opinion of the Independent Audit Team (delete where applicable):**

⊗ RusAF has passed the Audit- but must resolve remedial actions:

1. Incorporate data protection aspects to the [Whistle blowers Policy](#) – resolve remedial action for final confirmation by 15/01/2023.
2. Prepare RusAF regional development (anti-doping and integrity) policy – resolve remedial action for final confirmation by

01/03/2023.

### **I. Recommendations to RusAF:**

1. Annually provide external financial audit (similar to the one held in 2022).
2. Develop additional external income streams (e.g. sponsorship) to consolidate and further extend all activities.
3. Increase the visibility and attractiveness of the sport integrity and anti-doping “hotlines” to boost the number of reports, explain in more details the reporting possibilities, with emphasis on the whistleblowing policy and aspects of confidentiality and data protection.
4. Improve regional anti-doping rating with ethics and integrity criteria and share information on changes on internet site.
5. Work more actively to regional federations, fostering a mentoring relationship.

6. Recruit an education specialist to harmonise and centralize the educational (anti-doping and ethics and integrity) activities as well as documents to enhance the effectiveness of all educational initiatives and further bolster the change of culture.
7. Expand existing education activities more broadly, targeting not only athletes and coaches, but also the rest of athletes support personnel (medical or psychotherapists) as well as amateur's sport (organizers and participants of the respective mass competitions).
8. Extend sport integrity and anti-doping survey to a larger population of interest, including athletes support personnel, and repeat surveys on a constant basis to be able to compare data with the goal to see long term change dynamics.
9. Improve staff motivation system, with a goal to ensure the stability of the strategy implementation.
10. Put further emphasis on the vetting process, if it is allowed according to the Labour Code (improve it, to follow what World Athletics has in place).
11. Create a social dialogue platform for active discussion (for example: annual athlete forum) and exchange of the opinions, where athletes and coaches participate.

## **II. Recommendations to WA:**

1. Create instrument for evaluation (measuring) of anti-doping policy effectiveness and/or change of the culture.
2. Supervise change of the leadership, if any, and address any deviation from the criterion set out in the compliance roadmap.



Lead Auditor, Independent Audit of the Reinstatement Plan, Operational Road Map and KPIs.

13 December 2022