1. Introduction to the policy

It is the view of the IFCPF (International Federation of Cerebral Palsy Football) that in order to exhaustively protect clean CP Football players, we need to move beyond drug-testing alone and devise other, non-analytical ways of policing its anti-doping jurisdiction.

While testing remains a vital part of the anti-doping process, there remains a suite of Anti-Doping Rules violations (ADRVs) in both the World Anti-Doping Code (Code) and IFCPF Anti-Doping Code that cannot be revealed by an analytical investigative methodology. For example, the Possession, Administration and Trafficking of Prohibited Substances can only be established through collection of non-analytical information and evidence.

To this end, IFCPF has to deploy new investigative methods and techniques as well as forge new partnerships in its fight against doping in CP Football. These new partnerships will allow IFCPF to take advantage of the investigative powers of those partners that will in turn aid in uncovering reliable evidence for use in CP Football proceedings.

Purpose

Though analytical methodologies (i.e. sample collection) must continue, it is necessary to develop alternative non-analytical methodologies to better assist IFCPF fight against doping.

It is the purpose of this Policy to outline IFCPF principles and procedures for establishing and conducting investigations as well as regulating cooperation with other bodies and organizations including Anti-Doping Organizations (ADOs) in fighting against doping in CP Football.

To remove doubt, this Policy does not supersede or replace any national laws. Its purpose is to better enable IFCPF to collaborate with stakeholders in its fight to promote clean sports.

All information received by IFCPF Anti-doping staff shall be logged and stored in a safe and secure manner.
2. Intelligence Gathering

Gathering of Anti-Doping Intelligence

As per applicable anti-doping regulations, every ADO (including IFs) has to obtain, assess and process anti-doping intelligence from all available sources so as to help detect and deter doping within their jurisdiction.

For that, IFCPF shall acquire intelligence and conduct investigations securely and confidentially. IFCPF shall be responsible for acquiring information and intelligence from any source (e.g. person or entity) that detects, identifies, witnesses, knows of, or has reasonable grounds for suspecting an ADRV (Anti-Doping Rules Violation).

In keeping with IFCPF’s commitment to clean sports and thus protect clean CP Football players, IFCPF is responsible of encouraging anyone with knowledge of a possible breach of the WADA Code or the IFCPF Anti-Doping Rules to share that information with IFCPF Anti-Doping Committee (IFCPF ADC), who shall establish consequently a secure communication platform to confidentially receive all relevant information, example: an online whistleblowers platform on the website.

Any information should be shared with IFCPF using established reporting lines (anonymously online or by email):
- Online - https://www.ifcpf.com/contact
- E-mail - info@ifcpf.com

IFCPF ADC shall upon receipt of intelligence, obtain additional information or evidence to corroborate the information without compromising the confidentiality of the informant. Means of intelligence gathering shall include witness interviews, document reviews, cyber analysis and forensic analysis.

The procedure for acquiring information by IFCPF ADC shall be in compliance with the provisions of the applicable international regulations and thereby ensuring protection of the informants as well as observing the limitations to the right of access to information.

Assessment and Analysis of Anti-Doping Intelligence

Upon receipt of relevant information, an assessment will be conducted by IFCPF to determine its credibility, relevance and reliability - irrespective of the source.
3. Investigations

IFCPF is not only mandated with detecting and establishing ADRVs within CP Football, but also responsible for identifying evidence which disproves the commission of an ADRV.

IFCPF ADC shall conduct investigations including:

a) Investigation of Atypical findings and Adverse passport findings in accordance with applicable International Standards;
b) Investigation on any other analytical or non-analytical information or intelligence where there is reasonable cause to suspect that an anti-doping rule violation may have been committed;
c) Investigation into whether an Athlete Support Personnel or any other persons are involved in a rule violation by an Athlete; and
d) Investigation in relation with the production, movement, importation, distribution and supply of prohibited substances and performance-enhancing drugs in sport by non-athletes.

IFCPF shall ensure that the Atypical Findings and Adverse Passport Findings arising out of testing done are confidentially and effectively conducted in the cases where IFCPF is Testing Authority and/or Results Management Authority.

Owing to the analysis made, not every piece of information will require investigation. IFCPF shall put all possible means to ensure that all investigations are conducted in an impartial and objective manner.

The assigned IFCPF staff in charge of the investigation shall be tasked with proving or disproving, if possible, any matter or matters of fact arising out of the information gathered. This means they will gather evidence through oral recollections, documentary records, expert evidence and site inspection among other sources that may adduce corroborating evidence.

The assigned IFCPF staff in charge of the investigation is authorized to set collaboration with different investigative partners in the concerned area.

Evidence shall be gathered in accordance with the WADA Code, International Standards and all applicable rules of evidence to ensure their admissibility in any subsequent legal proceeding.

IFCPF investigator shall maintain a central investigation file with the complete record of the investigation, documenting stage, phone calls, interviews, decisions and conclusions made during the course of the investigation. This file will be stored securely to avoid unauthorized access, damage or alteration and to maintain confidentiality.

An investigation report shall be prepared at the conclusion of the investigation for the records of IFCPF, detailing the investigations findings and all supporting material. Where appropriate, the Investigation Report shall include any relevant recommendations.

An investigation may lead to any one of a range of possible outcomes, including:

- **Disciplinary Action**: An investigation may establish the occurrence of an anti-doping rule violation.
- **Disqualification**: An Athletes’ results in a particular competition or event are invalidated with forfeiture of any medals, points and prizes.
- **Provisional Suspension**: An athlete or any other person is barred temporarily from participating in any competition or activity prior to a hearing.
- **Ineligibility**: An athlete is barred for a specified period of time from participating in any competition or other activity.
- **Referral of the matter to an external body for further investigation.**
4. Handling confidential information and Managing informants

Although IFCPF recognizes the value of acquiring information and releasing data to other bodies for investigative purposes, it equally recognizes the need to maintain high standards for data privacy. IFCPF similarly recognizes the need for procedures that ensure informants’ privacy and the need to protect information relevant to the investigations.

All information from an Informant shall be received by the IFCPF ADC through IFCPF’s reporting channels. The IFCPF ADC shall be the sole and exclusive business unit within IFCPF to access any information received from an informant. IFCPF ADC shall also be responsible for assessing the value and veracity of any information received.

Measures should be taken to ensure that the confidentiality of any informant is safeguarded at all times, unless the informant authorizes in writing the release of identity unless otherwise required by law.

IFCPF ADC will conduct its investigation in cooperation with informant when necessary and provide a final investigation report. It shall have full discretion as to how the investigation is conducted or when the investigation is to be terminated.

At all stages of the process, and where reasonably practicable, all communication exchanges with the Informant shall be transcribed completely or partially in a written report and recorded, when possible.

When Informants face an ADRV, the Code provisions on Article 10.6.1 (Substantial Assistance) should be communicated to them, in particular the requirement to:

a) Fully disclose in a signed agreement all information he or she possess in relation to Anti-Doping Rule Violations.

b) Fully cooperate with the investigation and adjudication of any case related to that information, including, for example presenting testimony at a hearing if requested to do so by an ADO or a hearing panel.

c) The information provided must be credible and must comprise an important part of any case which is initiated or if no case is initiated must have provided a sufficient basis on which a case could have been brought.

In this regard, IFCPF ADC process only the Personal Information, including but not limited to whereabouts information, Therapeutic Use Exemptions, and test results, appropriate and relevant for investigating and establishing one or more anti-doping rule violations. However, Personal Information may be processed for other specified purposes exclusively related to the fight against doping.

IFCPF ADC shall not disclose personal information to another ADO or other third party except where such disclosure is necessary to allow fulfillment of its obligations under WADA Code or applicable laws and regulations or compulsory legal processes.
5. Data Protection

IFCPF has an on-going responsibility to protect any Personal Information under its effective control or in its possession, including Personal Information processed on its behalf.

IFCPF shall be accountable for ensuring data protection and privacy in compliance with the Code, International Standards and the applicable laws. IFCPF’s Data Protection Policy and Privacy Notice are available here: https://www.ifcpf.com/about-ifcpf

IFCPF ADC shall protect Personal Information that they process by applying all necessary security safeguards, including physical, organizational, technical, environmental and other measures, to prevent the loss, theft, or unauthorized access, destruction, use, modification or disclosure of Personal Information.

It shall be IFCPF responsibility to ensure that any access to Personal Information by IFCPF personnel shall take place on a need-to-know basis only and where consistent with assigned roles and responsibilities. Personnel accessing Personal Information should be informed of the need to hold Personal Information in confidence.

While it shall be necessary to share personal information to third party agencies in connection with Anti-doping Activities, IFCPF ADC shall ensure that such third party bodies are subject to appropriate controls, in order to protect the confidentiality and privacy of the Personal Information and to ensure that the Personal Information is only processed for and on behalf of IFCPF.

For purposes of retaining personal information IFCPF ADC shall ensure that personal information is only retained where it remains relevant to fulfilling IFCPF’s obligations under IFCPF Anti-Doping Code compliant with WADA Code and International Standards or as otherwise required by applicable law, regulation or compulsory legal processes.

Written by
IFCPF Anti-Doping Committee

Date Approved
April 2020

Date for Review
December 2020