



Whistleblowing Guidelines for NADOS, policy makers and sport federations

Introduction

Whistleblowing in sport is the access to and disclosure of information and acts of wrongdoing or omissions which represent a threat to the integrity of sport. Whistleblowing in anti-doping serves to prevent actions that undermine public interest and protect the integrity of sport. Though the intentions of whistleblowing and fight against doping in sport is for the benefit of sport and society, personal and organisational factors do greatly hinder whistleblowing intentions in sport organisations. The history of actions taken on cases reported on whistleblowing and anti-doping in sport highlight a significant challenge in the protection of clean sport. It is important to highlight that athletes depend on sport organisations and National Anti-doping Organisations (NADOs) to uphold the values of sport and ensure fairness. In addition, sport organisations and NADOs also depend on national structures to provide a firm bases of fairness to athletes and the sport stakeholders in general. This paper therefore offers guidelines for sport federations, NADOs and policy makers to be able to strengthen whistleblowing in the fight against doping in sport. Whistleblowing is a conscious decision to speak out and report misconduct in an organisational setting. Precisely, the World Anti-doping Agency (WADA), defines whistleblowing against doping as the disclosure of sensitive information about athletes and their entourage with respect to anti-doping rule violations; World Anti-Doping Code non-compliance violations; and acts or omissions that could undermine anti-doping efforts.

Rationale

The European Union (EU) Directives on the protection of persons who report breaches of Union Law (2019) require Member States to oblige private entities to set up secure internal reporting channels. Furthermore, it empowers private individuals in and outside the organisations to make public disclosure in certain circumstances. Sport organisations, NADOs and policy makers in the EU are therefore required to offer whistleblowing opportunities to further enhance transparency and accountability in sport. In addition, findings from other work packages of the WIN-Dop project revealed among others, weak, inconsistent or the complete lack of good practices, guidelines, policies, and frameworks on whistleblowing of doping irregularities in sport. Where they apply, an inherent lack of trust by athletes and members of organisations in the detection and reporting mechanisms that some of the sports federations, NADOs and member countries have put in place was observed. These guidelines intend to provide a framework that highlights the significance of prioritising individual experiences in whistleblowing and fight against doping at all levels of sport in the EU. This allows for distribution and coordination of procedures and policies at different levels of the sport and social structures.

These guidelines are elaborated in the context of the Erasmus+ WIN-Dop project, which aims to promote whistleblowing on doping irregularities in sport. Findings from the other work packages of the WIN-Dop project which included a literature review on whistleblowing; a quantitative and qualitative interview analysis of athletes; and an assessment of good practices of NADOs on whistleblowing serve as the bases for the elaboration of the initial draft of these guidelines. In addition to the EU Directives, other frameworks such as the WADA Whistleblowing Program (2016); UNODC & IOC Reporting Mechanisms (2019) also informed the definition and scope of these guidelines.



Objective of the guidelines

The guidelines are specifically meant for sports federations, NADOs and policy makers in the EU.

Among the objectives of the guidelines are:

- To assist sports federations in all Member States to provide the framework for organisational support of whistleblowing on doping irregularities by giving athletes and general membership the responsibilities.
- To provide NADOs in all Member States with intelligence-driven approaches of handling whistleblowing and anti-doping cases to enhance transparency and accountability of the sport system.
- To encourage policy makers to develop clear and consistent EU-wide basic principles, directives and laws that highlight the specific nature of doping in sport and provide national-specific framework for protection of whistleblowers on doping irregularities in all Member States.

The guidelines are structured to address whistleblowing on Anti-doping in sport for three main stakeholders: sports federations, NADOS and policy makers. For each of the three stakeholders, specific action point in three fields research, policy and education are described. Two internal and external areas of action are developed for each of the three fields. These areas of action are further developed into concrete action points for each of the stakeholder group.

Guidelines on whistleblowing and fight against doping in sport

1. Sport Federations

Sport federations are one of the strongest actors in the delivery of sport to a wide range of stakeholders in society. As they act on their behalf, they articulate rules and regulations which govern them. Strong anti-doping and whistleblowing regulations by sport federations strengthen the positive identification of the sport with society. Whistleblowing intentions in sport federations, to a large extent, is highly associated with older age and competitive sport. Sport federations are therefore expected to establish structures that will strengthen the positive image of the sport among stakeholders and in the society at large.

Research

- i. Collaboration with strong whistleblowing networks/agencies outside of sport
 - Integrate national and international law enforcement into internal whistleblowing research structures.
 - Incorporate Ombudsperson and other law enforcement agencies into research protocols.
 - Include and specify role of independent (national and international) law enforcement agencies into research on internal whistleblowing and anti-doping.
 - Highlight the impact of involving the independent (national and international) law enforcement agencies into research on internal whistleblowing and anti-doping.



- Incorporate independent national and international research institutions into research structures on whistleblowing and anti-doping research structures.
 - Collaborate with external (national and international) and independent research institutions into research on internal whistleblowing and anti-doping structures and channels.
 - Specify the role of external (national and international) research institutions in validation of research.
 - Develop specific research protocols involving independent external research institutions.
 - Establish research networks with other partner organisations in the same and different sport.
 - Form research collaborations on whistleblowing in anti-doping with similar sport discipline.
 - Establish research collaborations with national and international organisation in different sport disciplines.
 - Establish and be member of networks of research on whistleblowing in anti-doping.
- ii. Regular monitoring, review, and assessment
- Periodic review and updates of available whistleblowing channels and structures
 - Periodically revise the organisation's codes (written and silence), laws and other regulations.
 - Regularly review the internal and available external whistleblowing channels available to members of the organisation.
 - Monitor and evaluate internal and external whistleblowing and anti-doping structures.
 - Periodic publication of ongoing and addressed cases and procedures of resolutions.
 - Periodic publications of internal research and research by other stakeholders on the influence of individual (e.g. by coach) support.
 - Regularly publish internal ongoing and addressed cases as well as those of similar organisations and other stakeholders.
 - Publish monitoring and evaluation of research on cases and procedures of internal resolution mechanisms.
 - Establish clear internal sport-specific research and assessment procedures.
 - Specify number of items in data collection and analysis instruments.
 - Indicate and justify sport-specific research protocols.
 - Validate research and assessment procedures.

Education

- i. Educate and inform staff and members on whistleblowing policies and anti-doping.
- Create common understanding on how to channel resolution of internal sensitive issues.
 - Promote knowledge what constitute an un/acceptable behaviour for the organisation.
 - As the interpretation of the code of silence in sport organisations differs between sports, promote a deeper understanding of the sport-specific anti-doping behaviour.
 - Encourage open discussions on sensitive issues within all members of the organisation.
 - Sensitise staff and members on benefits, rights and responsibilities of whistleblowing.



- Produce and disseminate educational material on the history of the organisation on the fight against doping and whistleblowing and emphasising fairness in sport as key pillar in addressing doping issues.
 - Periodic distribution of information on rights and responsibilities of members of the organisation on the fight against doping irregularities and whistleblowing in the sport.
 - Make available and provide context-specific summaries of overarching policies available on anti-doping and whistleblowing.
 - Empower staff and members to manage fairness-loyalty trade-off and the benefits of whistleblowing.
 - Provide information on available organisational support to individuals and groups in the fight doping irregularities.
 - Simplify and share the descriptive and injunctive social norms of the organisation.
 - Facilitate information on available group-specific (e.g., Athletes, coaches, etc.) and general training to create sense of belonging in the organisation.
- ii. Standard Reporting channels (easy, reliable, and user-friendly)
- Sensitise on reporting and handling structures and personnel to align fears in process.
 - Provide clear and simple information on available internal legal documents to strengthen trust over anonymity.
 - Provide simple and user-friendly information on internal reporting channels and procedures.
 - Provide simple and reliable information on external reporting channels and procedures.
 - Clarify communication on handling procedures and allied external partners.
 - Communicate to different stakeholders within organization on available internal and external handling procedures.
 - Facilitate reliable information on roles and functions of external partners to guarantee protection in handling procedures.
 - Communicate intrinsic and extrinsic rewards guaranteed (personal gratification) to whistleblowers.
 - Facilitate information easy, reliable, and user-friendly reporting channels to address culture of silence.
 - Provide training to technical and administrative personnel of the organisation training at all levels on whistleblowing channels.
 - Integrate information on whistleblowing in anti-doping as part of the sport-specific training culture of athletes and staff induction process.
 - Provide information to internal stakeholders of organisation on whistleblowing in anti-doping.

Policy

- i. Establishment of clear organisational structures (internal and external) and diverse reporting mechanisms
- Establish diverse sport-specific internal and external reporting mechanisms as part of organisational structures.
 - Maintain an ethical climate around group, norms, and expectations through the internal and external reporting channels.
 - Integrate the promotion of anti-doping values as integral part of the organisational culture.



- Consult relevant internal and external stakeholders in the internal design of whistleblowing policy.
 - Specify internal and external reporting, treatment of information, support personnel and communications structures in the organisation.
 - Ensure there are fewer barriers for reporting, treatment, and communication of information.
 - Eliminate culture of silence around fight against anti-doping by providing available reporting information to all stakeholders.
 - Integrate treatment of information and available support personnel into structure of organisation.
 - Align organisational values, norms, codes of ethics to culture of whistleblowing and fight against doping.
 - Establish reporting mechanisms that value individual experience in reporting process.
 - Promulgate responsibility on protection of integrity of sport as part of norms, values, and codes of ethics of the organisation.
 - Adopt fairness in sport as key pillar in addressing doping issues.
- ii. Support mechanisms for Whistleblowers
- Integrate external support and reward system within the reporting mechanisms and specify support for athletes.
 - Enforce internal and external protection policies against retribution.
 - Incorporate reward systems to the different stakeholders in reporting mechanisms.
 - Formulate steps that reduce traceability in reporting channels and treatment procedures.
 - Specify sport-specific available whistleblowing channels and provide periodic internal training.
 - Establish action points on reports, mending broken ethical climate in reporting process.
 - Provide well-resourced and trained internal recipients of information.
 - Guarantee regularly updated training tools, manuals, and guides on whistleblowing.
 - Guarantee personal support mechanisms for athletes, coaches, and other members of organisation.
 - Ensure personal support mechanisms for each of the different internal stakeholders of the organisation to increase cost-benefits of whistleblowing (especially by athletes).
 - Adopt actions that alleviate reporter dilemma (especially athletes) by encouraging dialogue.
 - Establish policies on how to confront internal violators of anti-doping regulations.

2. National Anti-doping Organisations

The key mandate of national anti-doping organisations is to provide comprehensive national anti-doping programmes that will detect and prevent the violation of doping regulations and laws. As whistleblowing intentions are associated with cultural settings, norms and social values of national anti-doping organisations are required to develop context-specific structures that will consider these. These guidelines, therefore, provide a framework for national anti-doping organisations to implement and strengthen national whistleblowing structures.

Research

- i. Collaboration with strong whistleblowing networks/agencies outside of sport
- Specify national and international whistleblowing networks to be affiliated for research.



- Establish research collaborations with national universities and other independent research institutions.
 - Specify research collaborations with international research institutions in and outside sport.
 - Involve national and sport federation's Ombudsperson in research processes.
 - Indicate clear external investigation channels on whistleblowing and anti-doping in sport.
 - Provide periodic evidence on effects of diverse reporting channels.
 - Conduct periodic research on internal and external reporting channels in different sports.
 - Indicate external (national and international) investigation channels available.
 - Publish periodic best practices on how whistleblowing in sport and fight against doping in sport are being addressed.
 - Publish periodic good practices on whistleblowing in anti-doping in sport.
 - Provide evidence-based cases and best practices in different sport disciplines.
 - Provide evidence on demographic differences of reported cases and examples outside sport.?
- ii. Regular monitoring, review, and assessment
- Certify and review processes and organisational structures.
 - Monitor and review general sport whistleblowing processes and organisational structures.
 - Establish national (sport-specific and general) framework and timeline for review processes of whistleblowing structures.
 - Ensure consistency in assessment process and updates.
 - Provide platform for knowledge exchange of good practices.
 - Create platform for knowledge exchange within sport by different sport disciplines.
 - Create platform to share good practices with other areas outside sport.
 - Establish a framework for sharing common values on fight against doping irregularities in sport.
 - Establish standard research protocols.
 - Establish standards and protocols for research on whistleblowing in sport.
 - Provide a support framework for sport organisations with less capacity to comply with established standards.
 - Create reward systems for adherence to established research protocols in whistleblowing in anti-doping.

Education

- i. Educate and inform staff and members on whistleblowing policies and anti-doping.
- Promote Internal whistleblowing communications channels to complement the efforts of sport federations.
 - Provide user-friendly educational materials on whistleblowing in sport for public and sport stakeholders.
 - Share information on internal communications channels and handling processes.
 - Provide information on protection policies, support provided, whistleblowing procedures and processes.
 - Share good practices of sports organisations, NADOs and whistleblowing in other sectors.
 - Share knowledge with public on good practices of sport organisations and NADOs.



- Share information on good practices of whistleblowing in other sectors adopted in sport.
 - Share good practices on implementation of good practices by various sport organisations.
 - Promote the benefits and effects of whistleblowing in the fight against doping in sport.
 - Provide information on benefits of whistleblowing for sport.
 - Promote whistleblowing activities and animations for various stakeholder groups including parents of athletes, agents, etc.
 - Promote anti-doping behaviours within sport stakeholders.
- ii. Standard Reporting channels (easy, reliable, and user-friendly)
- Provide information that safeguards anonymity.
 - Provide educational material on how anonymity of whistle-blowers and physical protection is guaranteed.
 - Provide user-friendly digital educational material.
 - Disseminate information on whistle-blower standards for all sport organisations in the country.
 - Promote available benefits and rewards.
 - Provide information on benefits and rewards for whistleblowing.
 - Provide information on possible different reward systems in different sports at national and international level.
 - Emphasise reward for honesty in admittance of wrongdoing by offenders.
 - Clear referral of cases policies and procedures
 - Educate sport stakeholders and public on referral procedures.
 - Specify role of Ombudsperson, civil society, law enforcement agencies in referral procedures.
 - Emphasise need for fairness in treatment of information and independence of institutions as another requirement for referral of cases.

Policy

- i. Establishment of clear organisational structures (internal and external) and diverse reporting mechanisms
- Ensure explicit confidentiality and anonymity in internal and external protection mechanisms in structures.
 - Establish clear organisational support mechanisms to increase participation in whistleblowing.
 - Develop explicit policies on maintenance of confidentiality and anonymity.
 - Provide options for official external reporting mechanisms within organisational structures.
 - Encourage a culture of fair-play, transparency and accountability and protect clean athletes to maintain public confidence in sport.
 - Establish the promotion of fair-play, transparency, and accountability as integral parts of organisational structures.
 - Encourage clean sport to protect the integrity of sport and maintain public confidence.
 - Ensure that whistleblowing is embedded into code of ethics of sport organisations.
 - Specify involvement of third parties and perceived costs of whistleblowing in sport
 - Specify role and involvement of third parties like law enforcement in treatment of cases.
 - Encourage the training of experts to investigate and handle cases in sport disciplines.



- Formulate support mechanisms to sport organisations with required resources to encourage whistleblowing.
- ii. Support Mechanisms for Whistleblowers
 - Provide support framework for sport organisations to handle internal ethical concerns.
 - Provide support to sport organisations on how to help channel whistleblowing cases.
 - Provide credible, safe, and compliant reporting systems and channels.
 - Provide support framework to sport organisations to handle internal ethical concerns.
 - Define and contextualise anti-doping and whistleblowing terms and conditions.
 - Define and contextualise whistleblowing and fight against doping in sport.
 - Provide overarching resources that facilitates reporting and effective handling of cases.
 - Ensure safe avenues to report anti-doping irregularities and link it to promotion of safe sport.
 - Formulate clear whistleblowing mechanisms as part of positive recognition of code of ethics of sports organisations.
 - Provide framework for compliance of the sport sector with EU whistleblowing guidelines.
 - Ensure that clear whistleblowing education as part of the recognition of democratic processes of sport organisations.
 - Promulgate international and EU wide good practices on whistleblowing with sport organisations.

3. Policy Makers

Doping in sport is prevalent at all levels of sport practices, from grassroot to high performance. To curb this through the promotion of whistleblowing, policy makers are required to ensure knowledge transfer and accountability within sport and with other stakeholders outside sport. Policy makers are expected to define the roadmap and the role of each of the different stakeholders in whistleblowing including civil society organisations. The complexity of policy making on whistleblowing will require the recognition of the incompatibility of the different sectors and develop evidence-based policy responses to the sport sector and society at large. These guidelines are meant to provide a support structure for policy makers. They also take into consideration the need to merge and translate scientific knowledge into concrete action points.

Research

- i. Collaboration with strong whistleblowing networks/agencies outside of sport
 - Research and regular dissemination of information on cases and procedures for public consumption
- Establish regular research on whistleblowing in anti-doping at national level and with other EU member countries.
- Support research collaboration between national and international sport organisations and research institutions.
- Facilitate networking platform where national and EU-wide research information would be shared and disseminated.
 - Comparative assessment and sharing good practices from other sectors and countries.
- Evidence based standardisation and integration of WADA policies into formal national policies and setting.



- Assess whistleblowing standards in sport comparatively with other sectors such as the corporate.
 - Create platforms for sharing of comparative data and good practices within sport and with other sectors.
 - Framework for collection, storage, management of information and networking on whistleblowing research
 - Establish key stakeholders in and outside sport for the collection, storage, and management of whistleblowing in anti-doping information.
 - Establish national and international networks on whistleblowing in anti-doping research.
 - Create framework for the regulations of relations between the network stakeholders.
- ii. Regular monitoring, review, and assessment
- Overarching national monitoring, review, and compliance framework
 - Provide mechanisms to detect, prevent misconduct and breaches of national laws with regards to whistleblowing and fight against doping in sport.
 - Provide regular assessment and monitoring of whistleblowing mechanisms of national sport organisations.
 - Establish standard national whistleblowing and anti-doping compliance framework.
 - Ensure conformity with national and EU wide data protection regulations.
 - Establish national whistleblowing data protection policies and align with EU-wide policies.
 - Provide evidence and links of whistleblowing monitoring mechanisms in sport to other sectors like environment of society and countries.
 - Ensure uniformity of standards in monitoring, review, and assessment of whistleblowing frameworks.
 - Develop framework and standards for assessment and review of rules and legislations.
 - Establish framework of standards for compliance with EU regulations on whistleblowing.
 - Periodic review of whistleblowing framework, rules, and regulations.
 - Comparative assessment of compliance with other EU Member States.

Education

- i. Educate and inform the public on whistleblowing and anti-doping policies.
- Provide educational material on data protection and personal privacy and legal protection.
 - Provide general whistleblowing educational material that exalts the value of the whistle-blower.
 - Integrate public information on whistleblowing into public communications policies.
 - Promote the WADA protection of privacy and personal data of whistle-blowers into public communication policies.
 - Make publicly available educational materials for different educational levels.
 - Clearly define abuse of sport and Olympic power for by different organs.
 - Provide different educational materials for different educational levels.
 - Make publicly available educational materials at different institutional structures.
 - Provide citizens with available information to make informed decisions.
 - Highlight benefits of whistleblowing for sport and society.
 - Educate on need to blow the whistle as a form of maintaining values of sport for society.



- Present whistle-blowers as representation of a larger loyalty to society and sport values.
- ii. Standard Reporting channels (easy, reliable, and user-friendly)
 - Provide framework on nature and manner of data protection and personal privacy, external legal and physical protection.
 - Educate sport stakeholders on responsibility and need for reporting through official channels.
 - Provide simple educational material that emphasises reliability of reporting channels.
 - Educate public on data protection, anonymity, and external legal and physical protection mechanisms.
 - Provide external stakeholders and the public with information on mechanisms to access information.
 - Emphasise on the responsibility of every citizen to blow the whistle on doping irregularities.
 - Provide a checklist of official internal and external whistleblowing channels.
 - Educate on internal and external steps in blowing the whistle.
 - Educate on state referral, sanctioning of anti-doping violation instances.
 - Communicate in language/s understandable to and used by the majority.
 - Provide information on information storage and referral of cases.
 - Provide information on steps for sanctioning anti-doping violations at different levels.

Policy

- i. Establishment of clear organisational structures (internal and external) and diverse reporting mechanisms
 - Promote the establishment of external whistle-blower reporting and investigation structures.
 - Emphasise the establishment of formal whistleblowing structures in sport federations.
 - Validate the cooperation of external and sport whistleblowing structures.
 - Establish the adherence of whistleblowing in anti-doping structures as part of sport event hosting criteria.
 - Align the formulation and implementation of whistleblowing structures with national democratic principles.
 - Adopt alignment of WADA whistleblowing structures with national democratic structures and principles.
 - Promote the establishment of whistleblowing structures in sport organisations at all levels.
 - Establish whistleblowing role model sport organisations.
 - Establish overarching monitoring and compliance structures.
 - Establish overarching external monitoring and compliance structures.
 - Improve law enforcement surveillance over compliance of sport structures.
 - Establish external monitoring over reporting mechanisms.
- ii. Support mechanisms for Whistleblowers
 - Develop overarching legal protection and Prevent retaliation against whistle-blowers.
 - Align overarching whistleblowing legal protection mechanisms with those in sport.
 - Encourage of promotion of EU principles as part of whistleblowing requirements



- Set forth clear protection against retaliation mechanisms.
 - Enforce the adoption of good practices on whistleblowing from other sectors into sport.
- Support the adoption of good practices from other sectors.
- Enhance openness and accountability in the treatment of whistleblowing in sport.
- Promulgate a framework for even and consistent policies in the country.
 - Specify external and independent support and reward system for whistle-blowers in sport.
- Establish reward mechanism outside sport structures.
- Support reward mechanisms established by sport organisations and NADOs.
- Promote reward for whistleblowing on anti-doping in sport.

Synthesis of the guidelines

The variety of stakeholders involved in the delivery of sport and complex social structures require the active participation of strong actors who will provide the framework on which to address the challenges ensuing in sport. Doping irregularities are one of these challenges confronting the world of sport. The establishment of legally binding regulations by sport federations, national anti-doping organisations and policy makers for the promotion of whistleblowing will help reduce the practice and effect of doping. In addition, the collaboration of these stakeholders in the promotion of whistleblowing at all levels will enhance the positive image of specific sports that have been plagued with doping irregularities and sport in general.