



WORLD
SKATE

WHISTLEBLOWER POLICY

Policy & Procedure for reporting misconduct

TABLE OF CONTENTS

| | |
|--|---------|
| 1. INTRODUCTION AND SCOPE | PAG. 4 |
| 1.1 Key definitions | PAG. 5 |
| 1.1.1 Informant | PAG. 5 |
| 1.1.2 Whistleblower | PAG. 5 |
| 1.1.3 Respondent | PAG. 5 |
| 1.1.4 Misconduct | PAG. 5 |
| 1.1.5 Disclosure | PAG. 5 |
| 1.1.6 DELA Department | PAG. 5 |
| 1.1.7 World Skate Anti-Doping | PAG. 6 |
| 1.1.8 World Anti-Doping Agency (WADA) | PAG. 6 |
| 2. MAKING A DISCLOSURE TO WORLD SKATE | PAG. 6 |
| 2.1 Informant or Whistleblower? | PAG. 6 |
| 2.2 Who can make a Disclosure to World Skate? | PAG. 6 |
| 2.3 What can be the subject of a Disclosure? | PAG. 6 |
| 2.4 Who can Misconduct be committed by? | PAG. 7 |
| 2.5 Contacting World Skate to make a Disclosure? | PAG. 7 |
| 2.6 Obtaining advice before making a Disclosure | PAG. 7 |
| 2.7 Investigative process of the DELA Department | PAG. 8 |
| 3. THE WHISTLEBLOWER | PAG. 8 |
| 3.1 Granting of Whistleblower status | PAG. 8 |
| 3.2 Whistleblower Agreement | PAG. 9 |
| 4. WHISTLEBLOWER PROTECTION MEASURES | PAG. 9 |
| 4.1 Protection of Identity and Confidentiality | PAG. 9 |
| 4.2 External Legal Assistance | PAG. 10 |
| 4.3 Protection against Retaliation | PAG. 10 |
| 4.4 Physical Protection | PAG. 11 |
| 4.5 Substantial Assistance | PAG. 11 |
| 5. RIGHTS AND RESPONSIBILITIES | PAG. 11 |
| 5.1 Informant | PAG. 11 |
| 5.2 Rights | PAG. 11 |
| 5.3 Responsibilities | PAG. 12 |
| 5.4 Whistleblower | PAG. 12 |
| 5.4.1 Rights | PAG. 12 |

| | | |
|-----------|--|---------|
| 5.4.2 | Responsibilities | PAG. 13 |
| 5.5 | World Skate Anti-Doping | PAG. 13 |
| 5.5.1 | Rights | PAG. 13 |
| 5.5.2 | Responsibilities | PAG. 14 |
| 6. | PROCEDURES AND SANCTIONS | PAG. 14 |
| 6.1 | Sanctions arising from a confirmed case of Misconduct | PAG. 14 |
| 6.2 | Sanctions arising from knowingly false Disclosures of alleged Misconduct | PAG. 15 |
| 7. | PRIVACY AND SECURITY | PAG. 15 |

WHISTLEBLOWER POLICY

1. Introduction and scope

World Skate is particularly concerned with the fight against doping and tries to do more and more to achieve a clean and healthy sport.

World Skate stands alongside the athletes, tries to educate and direct them towards the most virtuous choices. The fight against doping is a difficult fight but World Skate wants to be at the forefront to fight it because this is a fight for the protection of clean athletes, for the health of athletes and for the integrity of the sport.

While testing will always remain an integral part of World Skate anti-doping efforts, testing alone is not always sufficient in this fight. In particular, if the use of prohibited substances and prohibited methods may often be uncovered by analysis of samples, violations of antidoping rules, including use of prohibited substances and methods, are often more effectively identified and pursued through the gathering and investigation of “non-analytical” anti-doping intelligence and information. In this phase of investigation any single piece of information, even small or seemingly insignificant, can be crucial in unlocking and exposing doping activity and a key role can be played by Whistleblowers.

Information can be decisive to the work of World Skate so, if you have seen, heard, felt something, tell us and let us assess the information. You will be taken seriously.

A Whistleblower can make a disclosure of alleged Misconduct at any time.

World Skate, in particular the Disciplinary, Ethics and Legal Affairs Department (DELA Dpt.), which also covers the role of the Intelligence and Investigation team inside World Skate, actively encourages a disclosure by anybody who detects, identifies, witnesses, knows of, or has reasonable grounds to suspect any Misconduct.

Whistleblowers can seek advice from World Skate DELA Dpt. before making a formal Disclosure of information.

Maintaining the confidentiality of information and the anonymity of an informant or Whistleblower is of the utmost importance to World Skate. Making a Disclosure does not necessarily mean you will have to give evidence or that you will be identified as a Whistleblower.

World Skate DELA Dpt. will work to ensure that no act of retaliation against a Whistleblower will go unchallenged. Perpetrators will be held to account.

Whistleblowers enter into an agreement with World Skate and may engage closely with the Intelligence and Investigation team (DELA Dpt.) whilst the information and Disclosure of alleged Misconduct is reviewed and investigated.

The Policy sets out how information can be passed to DELA Dpt. in the strictest of confidence, the rights and responsibilities of Informants and Whistleblowers and the responsibilities of DELA Dpt. in receipt of whistleblowing information.

This Policy does not replace the existing reporting mechanisms of WADA, other national anti-doping organizations or law enforcement agencies who deal with doping violations and criminal offences, respectively. World Skate strives to work with all relevant stakeholders to continually evolve our practices within the sporting landscape, in order to develop increasingly robust and effective whistleblowing networks.

1.1 Key definitions

For the purpose of this Policy and its provisions:

1.1.1 Informant

An Informant is a person/entity making a disclosure of alleged Misconduct, or of information related to a potential Misconduct, to the DELA Dpt.

1.1.2 Whistleblower

An Informant is given Whistleblower status by World Skate, after signing a Whistleblower agreement with World Skate (see section 3).

1.1.3 Respondent

A Respondent is the person/entity against whom/which alleged Misconduct has been reported.

1.1.4 Misconduct

Misconduct includes any alleged anti-doping rule violation (ADRV), any alleged non-compliance violation, or any act or omission that could undermine the fight against doping including unethical behaviour, bribery and corruption (which are covered by [World Skate Code of Conduct and Code of Ethics](#)).

1.1.5 Disclosure

A Disclosure is an Informant's / Whistleblower's formal act of reporting any alleged Misconduct to World Skate.

1.1.6.1 DELA Department

The World Skate Disciplinary, Ethics and Legal Affairs department, which has been established to prevent and detect violations in World Skate Code of Conduct and Code of Ethics, also covers the role of the Intelligence and Investigation team inside World Skate.

1.1.7 World Skate

World Skate is the International Federation governing all sports performed on skating wheels, recognized by the IOC as well as an antidoping organization established under WADA and signatory of the WADA Code as the Antidoping organization for all sports performed on skating wheels.

1.1.8 World Anti-Doping Agency (WADA)

WADA is the global organization which coordinates, promotes and monitors the fight against doping in sport.

2 MAKING A DISCLOSURE TO WORLD SKATE

2.1 Informant or Whistleblower?

An Informant can make a disclosure of alleged Misconduct to World Skate and, specifically, to the DELA dpt., anonymously and in confidence at any time. Informants are not subject to the additional rights and protections afforded to a Whistleblower.

A Whistleblower can make a disclosure of alleged Misconduct at any time and enters into a signed agreement with World Skate. This agreement provides added rights and protections to a Whistleblower. Whistleblowers will engage with the DELA Dpt. over any relevant period of time whilst the information and Disclosure of alleged Misconduct is reviewed and investigated.

2.2 Who can make a Disclosure to World Skate?

World Skate actively encourages Disclosure by any person/s or entity that detects, identifies, witnesses, knows of or has reasonable grounds to suspect any alleged Misconduct as defined in 1.1.4.

2.3 What can be the subject of a Disclosure?

Any Misconduct as defined in art. 1.1.4) can be the subject of a Disclosure. It does not matter whether or not the alleged Misconduct relates to a Respondents past, present or planned future behaviour.

2.4 Who can Misconduct be committed by?

Misconduct can be committed by, but is not strictly limited to the following Respondents:

- Anti-Doping Organization (ADO) staff
- Athlete
- Athlete Support Personnel (ASP)
- Doping Control Officer(s) (DCO)
- National Governing Body (NGB) staff
- WADA - accredited Laboratory staff
- WADA staff
- WSK board, staff and others
- Others (i.e. Funding bodies, Home country sports councils and medical staff)

World Skate encourages potential Whistleblowers/Informants who may be unsure if their Disclosure relates to a category of Respondent listed above, to make contact via the reporting methods set out in 2.5 with DELA Dpt., who will make an assessment of the proposed Disclosure.

2.5 Contacting World Skate to make a Disclosure?

World Skate recognizes the importance of maintaining the security of informant and Whistleblower information. To protect the identity of Informants and Whistleblowers, the following contact methods are monitored by intelligence and investigation professionals which will ensure that the same person in the department will always be in touch with the informant/whistleblower, in order to avoid a leak of information:

- Email: deladepartment@worldskate.org

2.6 Obtaining advice before making a Disclosure

Before making a Disclosure, any individual/entity can seek advice from the DELA Dpt., which will also inform the person about her/his rights and responsibility. This can be arranged by contacting the DELA Dpt. via:

- Email: deladepartment@worldskate.org and antidoping@worldskate.org

Further information about the DELA Dpt. can be found in World Skate Statutes, By-Laws and Codes, all available [here](#).

2.7 Investigative process of the DELA Department

The investigative process of Dela Dpt. is addressed in World Skate By-Laws and World Skate Code of Conduct and Code of Ethics, all available [here](#).

The DELA Dpt. shall conduct its work with integrity, ethics and professionalism.

3 THE WHISTLEBLOWER

No Informant will be obliged to accept Whistleblower status. However, Whistleblower status does afford the Informant additional rights should they wish to co-operate further with DELA Dpt.

3.1 Granting of Whistleblower status

The granting of Whistleblower status will be at the discretion of the World Skate Prosecutor, together with the Chair of World Skate sports medicine commission. In their absence, the decision will be taken by one of the other members of the DELA Dpt. (also members of World Skate Legal Dpt.). The decision will be based upon an assessment of the Disclosure made by the Informant. The assessment will consider, but is not strictly limited to, the following factors:

- a. Whether the Disclosure has been made in good faith, on reasonable grounds, based upon an honestly held belief by the Informant.
- b. If the alleged Misconduct is subject to the rules and regulations contained within the World Skate Anti-Doping Rules, the World Anti-Doping Code (the Code) or related to the Code.
- c. If the date of the alleged Misconduct remains within the Code's statute of limitations¹.
- d. If the information provided is relevant to or assists in the fight against doping in sport.
- e. If the information provided is precise enough.

- f. The likelihood that additional evidence can be obtained to corroborate the allegation of Misconduct and/or there is a reasonable prospect of a resulting ADRV.
- g. The risk that anonymity cannot be maintained and that any resultant investigation and/or hearing/tribunal processes requires the revelation of the identity of the Whistleblower/Informant.
- h. Whether the significance of the information provided by the Informant is proportionate to the potential risks to the safety and wellbeing of the Informant and/or his/her family.

3.2 Whistleblower Agreement

A Whistleblower agreement between World Skate and the Informant must be signed before Whistleblower status is granted.

The Whistleblower agreement will set out:

- a. the rights and responsibilities of the Whistleblower and
- b. the Whistleblower protection measures.

¹ Article 17 the World Anti-Doping Code states:

No anti-doping rule violation proceeding may be commenced against an Athlete or other Person unless he or she has been notified of the anti-doping rule violation as provided in Article 7, or notification has been reasonably attempted, within ten years from the date the violation is asserted to have occurred.

Article 16 World Skate Anti-Doping Rules states:

No anti-doping rule violation proceeding may be commenced against an Athlete or other Person unless he or she has been notified of the anti-doping rule violation as provided in Article 7, or notification has been reasonably attempted, within ten (10) years from the date the violation is asserted to have occurred.

4 WHISTLEBLOWER PROTECTION MEASURES

4.1 Protection of Identity and Confidentiality

Maintaining the confidentiality of information and the anonymity of a Whistleblower is of the utmost importance to World Skate. Staff within DELA Dpt. who are involved in processing Whistleblower information are trained and experienced in handling this type of work.

The identity of a Whistleblower will not be revealed to anyone outside of DELA Dpt. and of the Chairman of World Skate sports medicine commission unless:

- a. The Whistleblower provides their consent in writing or,
- b. In the unlikely event that it is required by law.

All evidence and information obtained by DELA Dpt. is stored within secure systems and locations in compliance with the World Skate Anti-Doping Rules, [World Skate Anti- Doping Privacy Policy](#), the World Anti-Doping Code and the International Standard on the Protection of Privacy and Personal Information (ISPPPI). World Skate also adheres strictly to the General Data Protection Regulation (GDPR) as amended from time to time (click here for [World Skate Privacy Policy](#)).

4.2 External Legal Assistance

World Skate is unable to provide external legal assistance to Whistleblowers.

4.3 Protection against Retaliation

Whistleblowers should be free to assist in the fight against doping in sport without fear of reprisals of any kind. Where the identity of a Whistleblower becomes known, World Skate will work to ensure that the perpetrator(s) of any act of retaliation against the Whistleblower/Informant either directly or indirectly will be held to account.

Article 2.11 of the World Anti-Doping Code 2021² and Article 2.11 of the World Skate Anti-Doping Rules³ provide the new anti-doping rule violation: ‘Acts by an Athlete or Other Person to Discourage or Retaliate Against Reporting to Authorities’. World Skate will use article 2.11 to provide further protection and assurance to Whistleblowers/Informants and to sanction those whose conduct falls within the article.

Where appropriate, DELA Dpt. will assist the Whistleblower in making a report to the Police or other appropriate authority. Reporting to agencies outside of World Skate will necessitate the Whistleblower disclosing their identity to the other agency.

4.4 Physical Protection

World Skate is unable to provide any form of physical protection to a Whistleblower. Where a risk to the physical safety of the Whistleblower and/or their family becomes known, World Skate will assist the Whistleblower in engaging with the relevant competent authorities. A requirement of reporting to other authorities may require, with the consent of the Whistleblower, disclosure of their identity.

4.5 Substantial Assistance

Where an Informant or Whistleblower is charged with an anti-doping rule violation, they may be eligible to seek substantial assistance benefits as set out in Article 10.7.1 of the 2021 World Anti-Doping Code and in article 10.7.1 of the World Skate Anti-Doping Rules⁴.

5 RIGHTS AND RESPONSIBILITIES

5.1 Informant

¹ 2.11 Acts by an Athlete or Other Person to Discourage or Retaliate Against Reporting to Authorities https://www.wada-ama.org/sites/default/files/resources/files/code_2021_october2019.pdf

¹ 2.11 Acts by an Athlete or Other Person to Discourage or Retaliate Against Reporting to Authorities <http://www.worldskate.org/clean-sport/category/50-antidoping-rules-policies.html>

¹ Sets out how the provision of Substantial Assistance can in the correct circumstances lead to the: Elimination, Reduction, or Suspension of Period of Ineligibility or other Consequences for Reasons other than Fault.

5.2 Rights

An informant will have the following rights:

- a. The protection measures provided by World Skate (see 4)
- b. To seek advice from DELA Dpt. prior to making a Disclosure of potential Misconduct.
- c. To make a Disclosure or to pass any other relevant information in confidence, knowing that their identity will only be shared outside of DELA Dpt. as strictly

necessary (for example, where it is required by the Legal Team and/or WADA for the purpose of an assessment on Substantial Assistance).

- d. To make a formal Disclosure of Misconduct or to pass any other relevant information via the communication channels made available by World Skate (see 2.5).
- e. To receive an acknowledgement from World Skate upon receipt of the Disclosure, where possible.
- f. Where appropriate, to receive a timely notification as to whether or not Whistleblower status has been granted and, where possible, a justification for that decision.

5.3 Responsibilities

The Informant must:

- a. Make a Disclosure of Misconduct in good faith, with an honestly held belief that the Disclosure is accurate and made on reasonable grounds.
- b. Immediately inform the Dela Dpt. if they, or any other person, is in danger or at risk of reprisals resulting from the Informants contact with World Skate.
- c. Provide accurate information to the DELA Dpt. and, where appropriate, clarify information and consider providing further information if required.

5.4 Whistleblower

5.4.1 Rights

In addition to those rights afforded to an Informant (see 5.2), a Whistleblower has the additional, following rights:

- a. To maintain contact with and seek advice from a designated person within DELA Dpt.
- b. Where appropriate, to receive updates on how any investigation arising from the Whistleblower Disclosure is progressing. This will be at the discretion of the Prosecutor.
- c. At the discretion of the Prosecutor, to be notified of the final outcome and findings of any investigation related to the Whistleblowers Disclosure of alleged Misconduct.

- d. To maintain contact with the designated person in DELA Dpt. after an investigation has concluded, specifically in relation to matters concerning the maintenance of their anonymity.

5.4.2 Responsibilities

It shall be the responsibility of the Whistleblower to:

- a. Assume the same responsibilities of the Informant (see 5.3)
- b. Comply with any terms and conditions set out in the Whistleblower agreement.
- c. Not commit any anti-doping rule violations or any other act or omission which could undermine any ongoing or future investigation.
- d. Seek approval from the Intelligence and Investigations team before doing any act that is in any way related to an ongoing investigation.
- e. Maintain strict confidentiality at all times and to take all reasonable steps to protect their anonymity in accordance with the Whistleblower agreement. This responsibility remains applicable even after an investigation has concluded. Any breach of confidentiality by the Whistleblower will terminate the Whistleblower agreement and result in a loss of Whistleblower rights as set out in 5.4.1.

5.5 World Skate Anti - Doping

5.5.1 Rights

World Skate may, without limitation:

- a. Pass any information received from a Whistleblower/Informant to other Anti- Doping organizations, regulatory bodies and Law Enforcement Agencies. World Skate will ensure the anonymity of the Whistleblower/Informant is maintained as per the requirements of this Policy.
- b. Where a Disclosure of alleged Misconduct concerns the revelation of criminal activity, World Skate may refer the information/whistleblower and any evidence to a relevant national/international Law Enforcement Agency where appropriate.
- c. Seek further information from Whistleblowers when required during the investigation as per the signed Whistleblower agreement.

- d. Conduct investigations without interference from any third party as directed by the Prosecutor, Head of DELA Dpt.
- e. Conclude an investigation and, where appropriate, terminate the Whistleblower Agreement at any time.

5.5.2 Responsibilities

World Skate shall:

- a. Ensure that sufficient resources are in place to facilitate the implementation of this Policy in full.
- b. Protect the rights of individuals/entities to make a Disclosure of alleged Misconduct in confidence and to implement the protection measures set out in this Policy.
- c. Provide information to athletes and other relevant stakeholders, to educate them about this Whistleblower Policy.
- d. Make this Policy document publicly available on its website.
- e. Regularly conduct a review of this Policy in collaboration with relevant stakeholders.
- f. Where possible, publish data reflecting the number of Disclosures of alleged Misconduct and the outcomes.

6 PROCEDURES AND SANCTIONS

A Disclosure of alleged Misconduct will be received and reviewed by DELA Dpt. All Disclosures will be thoroughly reviewed and wherever possible acted upon. Where Whistleblower status is sought or considered desirable, the Disclosure of alleged Misconduct will be reviewed against the parameters set out in 3.1 above.

6.1 Sanctions arising from a confirmed case of Misconduct

Sanctions resulting from a proven breach of the World Skate Anti-Doping Rules and World Anti-Doping Code will be in accordance with article 10 of the World Skate Anti-Doping Rules and with article 10 of the Code. Sanctions can include, but are not limited to:

- a. Disqualification of results in competition
- b. Periods of ineligibility (banned from sport)

- c. Fines and other financial consequences such as forfeiture of prize money

Where appropriate, World Skate may refer cases and allegations of alleged Misconduct to law enforcement agencies and other professional bodies. Such referrals can result in further sanctions being issued against the Respondent, in accordance with the rule of law and with the policies of professional bodies.

The described conducts may lead to a different investigation as per World Skate Statutes and By Laws and the measures/sanctions included in [World Skate Code of Conduct and Code of Ethics](#) may be applied.

6.2 Sanctions arising from knowingly false Disclosures of alleged Misconduct

Where it becomes known that a Whistleblower has made a Disclosure, knowing it to be false, contravening the responsibilities set out in 5.3 (a) above, the Whistleblower agreement will be terminated immediately. Where appropriate, World Skate may commence proceedings against the Whistleblower pursuant to article 2.5 of the World Anti-Doping Code and the “Tampering” violation.

7 PRIVACY AND SECURITY

World Skate is committed to protecting the privacy rights of Whistleblowers, Informants and Respondents. World Skate will process data that it receives pursuant to this Policy in accordance with the ISPPPI and applicable law.

For more information about privacy please visit the [privacy policy on the World Skate website](#). If you have any concerns about how your data is processed by world Skate, you can get in touch with World Skate at legal@worldskate.org or by writing to World Skate, Av, De Rhodanie, 54 1007 - Lausanne - SWITZERLAND

Tel: +41 21 60 11 877