

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 1 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

1. Overview

The World Anti-Doping Code requires each NADO to create a Registered Testing Pool (RTP) of Athletes meeting specified criteria. Athletes in a Registered Testing pool shall be subject to and required to comply with the athlete whereabouts requirements set out in the International Standard for Testing and Investigations (ISTI). In fixing its Registered Test Pool the NADO is entitled to bear in mind the ability to create other pools of athletes who are subject to different whereabouts requirements (see International Standard for Testing and Investigations 4.8.3.

With this in mind BSADA has elected to create the National Test Pool 1(NTP1) whereby the athletes in this pool are also required to submit Quarterly whereabouts but are not in accordance with the ISTI. This policy sets out the whereabouts requirements for the both the RTP and NTP1. While the RTP athlete's whereabouts requirements and penalties are administered in accordance with the ISTI and the Code, this policy outlines the consequences for NTP1 athletes if they fail to comply with their whereabouts requirements.

Basic Principles

- BSADA has two (2) pools of athletes who are required to submit quarterly whereabouts
 - The RTP, whereabouts provided in accordance with the ISTI
 - The NTP1, whereabouts provided in accordance with this whereabouts policy
- Every athlete is in principle subject to testing at any time and any place
- Unannounced Out-of-competition Testing is at the core of effective Doping Control
- Without accurate athlete location information such testing is inefficient and sometimes impossible
- Athletes must provide sufficient information to enable themselves to be located without prior notice for testing while out of competition.
- A practical, workable approach to the application of this policy is imperative. Effective sanction for non-compliance is imperative.
- The NADO shall exercise its discretion to target priority athletes and to marshal resources efficiently and effectively.

The Code gives BSADA, as the designated NADO for Bermuda the discretion to determine which athletes in the Bermuda Testing Programme warrant inclusion in the RTP and to establish the criteria for inclusion in the RTP. The 'Test Pool Policy' outlines the process for inclusion and removal from the RTP and NTP1.

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 2 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

2. Support provided to RTP and NTP1 Athletes

An Athlete selected for the RTP and NTP1 will be given the following support and education from BSADA to enable them to fulfil their Whereabouts responsibilities:

1. An induction pack including contact details and whereabouts advice.
2. Explanation of the Whereabouts requirements and guidance on individual Whereabouts issues, such as, the most appropriate Whereabouts information to suit a particular sport or individual.
 - The offer of a face-to-face induction with a NADO including, a demonstration of the ADAMS system for RTP athletes.
3. Reminders by email (where details have been provided by the Athlete) to prompt Athletes to keep their Whereabouts information accurate and complete. Reminders will be sent in the month preceding the start of the quarter (i.e December, March, June and September) to remind athletes that a new quarter is about to begin and a new filing must be made.
4. An online tutorial available to all ADAMS users (RTP Athletes) with a step-by-step audio visual demonstration of the ADAMS system.
5. Urge/Encourage athletes to submit whereabouts early so that they can be reviewed and any areas of concern can be addressed and resubmitted prior to the deadline.

Athletes should be aware that it is their sole responsibility to submit accurate and timely whereabouts whether they received support in the form of reminder emails or not. Not receiving emails will not be accepted as a reasonable excuse for failing to submit accurate and up to date quarterly whereabouts.

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 3 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

3. Athlete Whereabouts Requirements

Athlete Consent

An Athlete in the RTP or NTP1 is required to give consent to the NADO for the sharing of his/her Whereabouts filings with other ADOs having authority to test him/her. Athletes will be asked to do this either when they first logon to ADAMS in the case of RTP athletes, or when they are notified of their selection in the RTP or NTP1.

Failure and/or refusal to consent to the sharing of his/her Whereabouts filings can render an Athlete in breach of the BSADA Anti Doping Rules. Failure to provide consent may preclude them from participation in their sport.

Athlete Correspondence

An Athlete in the RTP or NTP1 is required to provide complete email and mailing addresses within their whereabouts filing where correspondence may be sent to the Athlete for formal notice purposes. These should be email and mailing addresses where he/she knows that any correspondence received there will be immediately brought to his/her attention. Any notice or other item mailed or emailed to these addresses will be deemed to have been received by the Athlete five (5) working days after it was deposited in the mail or sent via email.

Athletes with a Disability

An Athlete with a disability must provide details of his/her disability with their whereabouts filing and identify any modifications they may need to aid Sample collection. For example, a visually impaired Athlete must provide whereabouts information where a representative is available to accompany them throughout the Sample collection session.

Athletes should be aware that if they do not provide information here to assist in the planning or conducting of a test to meet the needs of a particular disability, they risk a possible ADRV for evasion or tampering with Doping Control in accordance with Article 2.3 and 2.5 of the Code..

Athletes who are Minors

Minors must also provide whereabouts information where a representative is available to accompany them throughout the Sample collection session. Parental consent must be sought for all athletes who are minors.

Athletes who are Minors and their representative should be aware that if they do not provide information here to assist in the planning or conducting of a test, they risk a possible ADRV for evasion or tampering with Doping Control in accordance with Article 2.3 and 2.5 of the Code.

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 4 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

3.1 RTP Athletes Whereabouts Filing Requirements

Before 0:00 (i.e.12:00am) of the first day of each quarter the Whereabouts Filing must be completed and submitted for that quarter in accordance with the International Standard for Testing and Investigations, i.e. completed whereabouts for the upcoming quarter should be submitted no later than 23:59pm December 31, 23:59pm March 31, 23:59pm June 30, and 23:59pm September 30.

An athlete in the RTP must file a Whereabouts filing in accordance with the International Standard for Testing and Investigations with BSADA that contains at least the following information:

- a. For each day in the forthcoming quarter, one specific 60-minute time slot between 05:00 and 23:00 where he/she will be available for Testing at a specified location.

An Athlete is eligible for Testing at any time and any location. If an Athlete updates his/her 60-minute time slot for a particular day prior to the original 60-minute slot, he/she must submit to Testing if he/she is located during that original 60-minute time slot.

Athletes cancelling a 60-minute slot must immediately replace it with another 60-minute slot. If the Whereabouts information does not provide a 60-minute slot on every day of the quarter at any one time, the Athlete may be subject to a Filing Failure (as defined in the International Standard for Testing and Investigations).

Athletes should remain at the location specified on their Whereabouts for 60-minutes. Where an Athlete cannot be located by a DCO during the 60-minute slot this may constitute a Missed Test(as defined in the International Standard for Testing and Investigations).

Athletes can make emergency updates to their 60-minute slot using the following services and provided the update is made before the beginning of the 60-minute slot:

- Email: whereabouts@bsada.org

- b. For each day of the quarter, the full address of the place where the Athlete will be residing must be filed (e.g. home, temporary lodgings, hotel, etc).

Athletes should update their whereabouts when the place they regularly reside for that quarter changes.

- c. For each day during the following quarter, the name and address of each location where the Athlete will train, work or conduct any other **regular** activity, as well as the usual time-frames for such

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 5 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

regular activities. If the Athlete is not currently training, he/she should specify that fact in his/her Whereabouts Filing and detail any other **routine** that he/she will be following in the forthcoming filing period, e.g. his/her work routine, university or school schedule, or rehab routine, or other routine, and identify the name and address of each location where that **routine** is conducted and the time-frame during which it is conducted. Athletes should only provide **regular** activities to fulfil this requirement.

Athletes will not be subject to Missed Tests (as defined in the International Standard for Testing and Investigations) if they are not available at their regular location as provided in their Whereabouts Filing, however, an Athlete may be at risk of committing a Filing Failure (as defined in the International Standard for Testing and Investigations) if the information given in ADAMS or their whereabouts filing is found to be deliberately misleading or evasive.

Athletes are not required to provide the NADO with last minute updates to a regular activity where there is an occasional departure from this schedule, however, if the Athlete's 60-minute slot should fall within a regular activity, the Athlete must update their Whereabouts filing before the beginning of the 60-minute slot or may be subject to a Missed Test (as defined in the International Standard for Testing and Investigations).

Similarly, it is an Athlete's responsibility to ensure their Whereabouts filings are accurate and up-to-date and that any permanent changes to their regular schedule are reflected in their Whereabouts filings.

- d. The Athlete's competition schedule for the following quarter, including the name and address of each location where the Athlete is scheduled to compete during the quarter and the date(s) on which he/she is scheduled to compete at such location(s).

Athletes must continue to provide a 60-minute slot for every day of the quarter, including during competition periods. Athletes must remember that it is their responsibility to provide a 60-minute slot where they are available for testing.

3.1.1 Whereabouts Filing for RTP Athletes

- Athletes are encouraged to submit their Whereabouts Filing prior to the beginning of the quarter as this will give BSADA the opportunity to support the Athlete should this be necessary.
- Before 00:00 (i.e.12:00am) of the first day of each quarter the Whereabouts Filing must be completed and submitted for that quarter. I.e.

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 6 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

completed whereabouts for the upcoming quarter should be submitted no later than 23:59 December 31, 23:59 March 31, 23:59 June 30, and 23:59 September 30.

- If the Athlete does not comply with this requirement, BSADA will notify the NSGB of a possible Filing Failure.
- Athletes will receive regular reminders from BSADA about updating their Whereabouts filings.

3.1.2 Whereabouts Failures

- Athletes in the **RTP** may receive a Missed Test (as defined in the International Standard for Testing and Investigations) if they are not at the location specified for their 60-minute slot.
- Athletes in the RTP may commit a Filing Failure (as defined in the International Standard for Testing and Investigations) if they do not submit their Whereabouts information for the quarter on the day specified by BSADA.
- Athletes may commit a Filing Failure or Anti-Doping Rule Violation (as defined in the International Standard for Testing and Investigations) for providing incorrect or misleading Whereabouts information.
- BSADA will keep a record of all Whereabouts Failures (Missed Tests and Filing Failures as defined in the International Standard for Testing and Investigations) alleged in respect of each Athlete within the RTP. Where it is alleged that an Athlete has committed three (3) Whereabouts Failures (as defined in the International Standard for Testing and Investigations) within any 12-month period, this may lead to an Anti-Doping Rule Violation in accordance with Article 2.4 of the Code and the period of ineligibility shall be at a minimum one (1) year and at a maximum two (2) years based on the Athlete's degree of fault in accordance with Article 10.3.2 of the Code.

3.1.3 Last minute Whereabouts updates

Athletes can make last minute updates to their Whereabouts filings using ADAMS or the following services, provided the update is made before the time specified in their Whereabouts filing:

- Email: whereabouts@bsada.org

Athletes must not provide multiple changes or long term changes to their Whereabouts filing via email. These changes must be made in ADAMS or updated on their whereabouts filing.

3.2 NTP1 Whereabouts Filing Requirements

Before 00:00 (i.e. 12:00am) of the first day of each quarter the Whereabouts Filing must be completed and submitted for that quarter, i.e. completed

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 7 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

whereabouts for the upcoming quarter should be submitted no later than 23:59 December 31, 23:59 March 31, 23:59 June 30, and 23:59 September 30. An Athlete in the NTP1 must file a Whereabouts filing with BSADA that contains at least the following information:

- a. For each day during the following quarter, the full address of the place where the Athlete will be residing (e.g. home, temporary lodgings, hotel, etc).

Athletes should update their whereabouts when the place they regularly reside for that quarter changes.

- b. For each day during the following quarter, the name and address of each location where the Athlete will train, work or conduct any other **regular** activity, as well as the usual time-frames for such **regular** activities. If the Athlete is not currently training, he/she should specify that fact in his/her Whereabouts filing and detail any other **routine** that he/she will be following in the forthcoming filing period, e.g. his/her work routine, university or school schedule, or rehab routine, or other routine, and identify the name and address of each location where that **routine** is conducted and the time-frame during which it is conducted.

Athletes should only provide **regular** activities to fulfil this requirement. Athletes will not be subject to Missed Tests if they are not available at their regular location as provided in their Whereabouts filing, however, an Athlete may be at risk of committing a Filing Failure if the information given in their whereabouts is found to be deliberately misleading or evasive.

Athletes are not required to provide the NADO with last minute updates to a regular activity where there is an occasional departure from this schedule.

Similarly, it is an Athlete's responsibility to ensure their Whereabouts filings are accurate and up-to-date and that any permanent changes to their regular schedule are reflected in their Whereabouts filings.

- c. The Athlete's competition schedule for the following quarter, including the name and address of each location where the Athlete is scheduled to compete during the quarter and the date(s) on which he/she is scheduled to compete at such location(s).

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 8 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

3.2.1 Whereabouts Filing for NTP1 Athletes

- Athletes may submit their Whereabouts Filing early to allow BSADA the opportunity to review their whereabouts. .
- Before 00:00 (i.e.12:00am) of the first day of each quarter the Whereabouts Filing must be completed and submitted for that quarter. I.e. completed whereabouts for the upcoming quarter should be submitted no later than 23:59 December 31, 23:59 March 31, 23:59 June 30, and 23:59 September 30.
- Athletes will receive regular reminders from BSADA about updating their Whereabouts filings.

3.2.2 Filing Faults

- Athletes in the NTP1 may commit a Filing Failure if they do not submit their Whereabouts information for the quarter on the day specified by BSADA.
- Athletes may commit a Filing Fault for providing incorrect or misleading Whereabouts information.
- Where it is alleged that an Athlete has committed three (3) Filing Faults within any 12-month period, this may lead to a sanctions being imposed on the athlete.

3.2.3 Penalties for non-conformities and NTP1 Filing Faults

- An athlete will receive a written warning for their first Filing Fault and their NSGB will be advised.
- On receiving their second Filing Fault, in a 12 month period, an athlete will receive a written warning and their NSGB will be advised of the failure to comply and the consequences of future sanctions.
- If an athlete commits 3 Filing Faults in a 12 month period they will be moved up to the RTP whereby they will have to submit quarterly Whereabouts in accordance to the International Standard for Testing and Investigations and will be subject to the consequences as indicated in the International Standard, as well as Article 2.4 of the Code, for whereabouts failures. The relevant NSGB will be advised of this fact.

3.2.4 Whereabouts updates

Athletes can make updates to their Whereabouts filings using the following services,

- Email: whereabouts@bsada.org

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 9 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

4. Whereabouts process for International Registered Testing Pool (IRTP) Athletes not in the RTP

While it is BSADA's priority that athletes in the RTP are provided with the education and support they need to fulfill their Whereabouts requirements, BSADA is also aware that some athletes that are in the RTP may be selected by their International Federation (IF) for the IRTP. In such cases, and where necessary at the request of the NSGB, the NADO will provide IRTP athletes with an ADAMS user guide and access to the online ADAMS tutorial.

IRTP athletes will not be directly invited to any induction/re-induction session but following a request by a NSGB, the NADO may allow them to attend such a session although this will be determined on a case by case basis.

BSADA is also committed to supporting NSGBs by encouraging IFs to provide sufficient support to IRTP athletes.

5. Communication

Athletes are encouraged to be as open and transparent about their Whereabouts. RTP athletes must pay careful attention to the accuracy of their 60-minute slot, but all Athletes required to submit whereabouts (both RTP and NTP1) should be aware that when incorrect or misleading Whereabouts information is given, Athletes may come under close investigation and may be at risk of committing a Filing Failure or ADRV for evasion or tampering with Doping Control in accordance with Code Article 2.3 and 2.5.

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 10 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

Definitions

ADAMS or The Anti-Doping Administration and Management System is a web-based database management tool for data entry, storage, sharing, and reporting designed to assist stakeholders and WADA in their anti-doping operations in conjunction with data protection legislation.

Anti-Doping Organisation (ADO) means a signatory to the **Code** that is responsible for adopting rules for initiating, implementing or enforcing any part of the Doping Control process. This includes for example the International Olympic Committee (**IOC**), International Federations (**IF**) **WADA** and **NADOs**.

Anti Doping Rule Violation (ADRV) is defined pursuant to Article 2 of the **Code**.

Athlete is defined pursuant to the WADA **Code** 2015.

BSADA means Bermuda Sport Anti Doping Authority and is the NADO for Bermuda.

Code means the World Anti-Doping Code (The Code) is the fundamental and universal document upon which the World-Anti-Doping Program in sport is based.

Doping Control means all steps and process from test distribution planning through to ultimate disposition of any appeal including all steps and processes in between such as provision of whereabouts information, Sample collection and handling, laboratory analysis, therapeutic use exemptions, results management and hearings.

Doping Control Officer (DCO) are those individuals who conduct **Sample** collection.

Filing Failure means an athlete has failed to provide accurate and complete information about their whereabouts during the forthcoming or current quarter.

Filing Fault means an athlete in the NTP1 has failed to provide accurate, timely and complete information about their whereabouts during the forthcoming or current quarter.

In-Competition means the period commencing twelve hours before a competition in which an athlete is scheduled to participate through the end of the competition and the sample collection process related to the competition

International Federation (IF) means the international governing body for a particular sport.

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 11 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

International Standard (IS) means a standard adopted by **WADA** in support of the **Code**. Compliance with an International Standard (as opposed to another alternative standard, practice or procedure) shall be sufficient to conclude that the procedures addressed by the International Standard were performed properly. There are 4 IS including the **IST (International Standard for Testing)** and the **ISPPP (the International Standard for the Protection of Privacy and Personal information)**.

IRTP means the International Registered Test Pool and is defined by the **IF**.

Minor means any Athlete under the age of 18.

Missed Test means when an athlete is not available for testing during his/her specified 60 minute time slot at the location specified for that time slot for that day as specified in the whereabouts filing, he/she will be liable for a missed test.

National Anti-Doping Organisation (NADO) means the entity designated by each country as possessing the primary authority and responsibility to adopt and implement anti-doping rules, direct the collection of samples, the management of test results, and the conduct of hearings, all at the national level.

National Sport Governing Bodies (NSGB) means; in respect of any country, a sporting organisation that is recognized by the relevant international sporting federation as being the organisation responsible for administering the affairs of the sport in that country; or in respect of Bermuda, a sporting organisation that is recognized by the Government as being responsible for all or a substantial part or section of the sport in Bermuda whether or not there exists an international sporting federation in relation to that sport.

NTP 1 means the National Test Pool 1.

Out of Competition Test means any doping control which is not conducted in-competition.

RTP means the Registered Test Pool.

Sample means any biological material collected for the purposes of **Doping Control**.

Testing means the parts of the **Doping Control** process involving test distribution planning, **Sample** collection, **Sample** handling, and **Sample** transport to the laboratory.

WADA means the body founded by the International Olympic Committee and constituted as a foundation in Lausanne, Switzerland by an instrument of foundation signed on 10 November 1999.

Whereabouts means athletes who have been identified by their NADO for inclusion in a **RTP** and, in the case of Bermuda the **NTP1**, shall provide accurate, current location information. Whereabouts shall be submitted by the Athlete each

| | |
|--|--------------------------------|
| Bermuda Sport Anti-Doping Authority | Document no: Page 12 of 12 |
| Policy Title: Athlete Whereabouts Policy (RTP and NTP1) | 2015 Code Version: 1 |
| Lead Person: Duncan Barclay | Approved Date: |
| | |

quarter and shall be updated in accordance with this Policy. This information will be kept on file by BSADA for at least 18 months.

Whereabouts Failures means either a **Filing Failure** or a **Missed Test**.