

INTERNATIONAL STANDARD FOR EDUCATION (ISE) Consultation - Second consultation phase

Showing: All (128 Comments)

PART ONE: INTRODUCTION, CODE PROVISIONS AND DEFINITIONS (9)

World Rugby

SUBMITTED

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

We consider that the second draft version of the ISE is a considerable improvement on the first draft, and the decision to move much of the detail from the first draft into a new Guidelines for Education document is logical and makes the ISE much more succinct.

US Olympic Committee

SUBMITTED

Sara Pflipsen, Senior Legal Counsel (United States)
Sport - National Olympic Committee

The USOC notes the change to expand education efforts to be the responsibility of all Signatories, not just ADOs. The USOC, and most likely all other NOCs, rely heavily on the expertise of our NADO, USADA, in anti-doping matters, including education. Having USADA responsible for this task in the past has provided the USOC with comfort knowing that it is being conducted in a comprehensive and effective manner. With the expansion of individuals being subject to the authority of the Code, including Board members and employees of USOC, the USOC understands why it is prudent to be involved in these educational efforts. However, WADA should place the primary responsibility of educational efforts with the ADOs, as they are the leading experts in these matters. The USOC absolutely does, and will, support all education efforts, and simply encourages WADA to include guidelines as to the parameters of obligations and responsibilities in education efforts between a NOC and NADO.

The USOC supports a shift for educational modules to include more positive messaging in the content.

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

JADA has done again a wide consultation getting the comments from the national stakeholders, Athlete Committees and the ISE working group of JADA as well as the internal staff members. We welcome the direction of ISE Draft2, particularly it has streamlined the focus and target groups with the outcome in mind. The Athlete Committee welcomes the integration of Athlete Right into the fundamental necessity of education for not only the athletes from young age but also for the Athlete Support Personnel. There are some areas that can be improved particularly from the clarifications point of view.
- Any sentence on "directions and guidance on XXX are available/ provided in the Guidelines for Education" can be as Comment rather than the current in-between the sentence.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

Suggest that Code Article 18.1 (Principle and Primary Goal of Education) is included in Part One of the ISE

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

General comments

- We welcome the development of an International Standard for Education.
- The wording of the World Anti-Doping Code and the ISE are not always completely in line with each other. Please take a close look on this aspect during the final revisions.
- Not all countries have a school-based athlete development system. We suggest to change wordings like "... ideally through school programs" and "...into school programs" to wording which includes sport club programs next to school programs. E.g.: "...ideally throughout all stages of athlete development, for example through school or sport club programs."
- National Federations are no signatories of the Code. Nevertheless, the ISE should enable signatories of the Code (e.g. IFs, NADOs) to achieve maximum leverage for the NFs support to comply with their education programs.
- We would like to suggest that it could be explicitly mentioned that education for minors should preferably be available in their native tongue.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

The inclusion and recognition of clean Athletes is welcomed.

Conseil supérieur des sports

Matheo TRIKI, Sportif Rugby (Espagne)
WADA - Others

SUBMITTED

1.0 Introduction and scope

The International Standard for Education is a mandatory International Standard developed as part of the World Anti-Doping Program.

The overall guiding purpose of the International Standard for Education (ISE) is to support the preservation of the spirit of sport as outlined in the World Anti-Doping Code (Code) and to help foster a clean sport environment. There are a number of objectives that the ISE will aim to achieve in support of this purpose.

The second objective of the ISE is to provide clarity for:

1.
 - a) Definitions for terminology in the education field
2.
 - b) Roles and responsibilities for all Signatories responsible for planning, implementing, monitoring and evaluating Education Programs.

The third objective of the ISE is to ensure focused use of Signatories' resources

2.0 Code provisions

To be updated based on the 2021 Code process.

- 1.

3.0 Definitions and interpretation

2.

3.1 Defined terms from the 2015 Code that are used in the International Standard for

3.2 Defined terms specific to the International Standard for Education:

Education: In relation to clean sport, the process of raising awareness, providing information, delivering anti-doping education underpinned by the values of the spirit of sport, to contribute to the prevention of intentional and unintentional doping. The components of education referenced here can be further defined as

3.3 Interpretation:

3.3.1 Unless otherwise specified, references below to Articles are references to Articles of the International Standard for Education (ISE).

3.3.2 The comments annotating various provisions of the ISE shall be used to interpret the ISE.

3.3.4 The official text of the ISE shall be maintained by WADA and shall be published in English and French. In the event of any conflict between the English and French versions, the English version shall prevail.

International Paralympic Committee

James Sclater, Director (Germany)
Other - Other (ex. Media, University, etc.)

SUBMITTED

General: The new version is a marked improvement and fits well as a standard.

Institute of National Anti-Doping Organisations

Graeme Steel, Chief Executive (Germany)
Other - Other (ex. Media, University, etc.)

SUBMITTED

It is understood that the draft was produced in some haste and the "English" needs to be tidied up in places. Not all those places referenced below.

1.0 Introduction and scope (9)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

The third objective of the ISE is to ensure focused use of *Signatories'* resources by:

1. a) Requiring *Signatories* to establish an Education Pool through a structured planning process that shall as a minimum, include ~~Athletes in the Registered Testing Pool~~ and *Athletes* under a suspension period.

Athletes in RTP are Top Level Athletes, they are tested a lot compare to other athletes and are already educated; it should not be mandatory to include RTP or TPs athletes in the Education Pool, they are not the priority target of an Education program.

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

SUBMITTED

P4: "the ISE will outline the minimum standards and principles that Education Programs shall implement"

Suggest:

"The ISE will outline the minimum standards and principles that Signatories shall implement in their Education Programs"

"...seeks to help Athletes and other Persons to prevent the commission of ADRVs"

Commission of ADRVs does not seem correct. Suggest:

"...seeks to help Athletes and other Persons from committing ADRVs"

Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

SUBMITTED

- The Athlete Charter must be referred particularly from the athletes' right of being educated, being as a messenger / champion athlete and being the Educator. The Preamble of #1, 5 in particular can be referred too.

- The sentence in Part Two Overview "All activity should be underpinned by the ...by the values-Based Education component" should be mentioned in this section too.

- c) "...go beyond the minimum requirements...through Values-Based Education programs that will help instill..."

--> this phrase should be reconsidered. Even though it would be difficult to make the "Values-Based Education" as a minimum standard/requirement, its significance should strongly be stated in light of promoting the values message, ie. "clean sport, spirit of sport and integrity of sport". The proposed sentence: "Ensuring Signatories to develop and implement the Values-Based Education" programs even though it is more than the minimum requirements."

Anti Doping Denmark

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

SUBMITTED

PART ONE: INTRODUCTION, CODE PROVISIONS AND DEFINITIONS.

clarify the "suspension period".

The term "*Athletes* serving a suspension period" need better explanation either here in the **3.2** in **4.3.1** or in definitions; the practical implications of these requirements need explanation – when, where and how to reach out to these very specific persons; especially as this is a mandatory part of the ISE; The third objective of the ISE is to ensure focused use of *Signatories'* resources by: a) Requiring *Signatories* to establish an Education Pool through a structured planning process that shall as a minimum, include *Athletes* in the *Registered Testing Pool* and *Athletes* under a suspension period.

Clarify the "suspension period". The term "*Athletes* serving a suspension period" need better explanation either here in the **3.2** in **4.3.1** or in definitions; the practical implications of these requirements need explanation – when, where and how to reach out to these very specific persons; especially as this is a mandatory part of the ISE;

Drug Free Sport New Zealand

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

SUBMITTED

1.0 Page 4 (para 5)"the ISE will outline the minimum standards and principles that Education Programs shall implement"Suggested edit:"The ISE will outline the minimum standards and principles that Signatories shall implement within their Education Programs".

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

· Third objective, b. “Requiring Signatories to establish an Education Pool through a structured planning process that shall as a minimum, include Athletes in the Registered Testing Pool and Athletes under a suspension period.”

Please give more clarity on when a suspended athlete should be included in the education pool. Throughout the suspension, at the beginning, at the end? And what kind of education is important for a suspended athlete? Is this education general or tailored?

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Introduction and scope, “third objective”, part (a), and for Article 4.3.1 – Athletes in the Education Pool

We disagree with the narrow scope of which ‘Athletes’ are to be included. Whilst accepting that there is a view that many ADOs may struggle to educate all the Athletes they would like to, this statement contradicts both what is proposed later in the ISE and what is outlined in the revised Article 18 of the Code. Equally, when this exercise was conducted with ADOs responsible for education (where we tested this perception), it was clear that ADOs are managing to reach Athletes to educate them well beyond those formally part of their RTP (where the definition of Athletes in an RTP is those who are providing Whereabouts).

We raise the concern that this minimum requirement will not ensure that Athletes’ first experience of anti-doping is through education, not testing. Due to the increase in intelligence-based testing, it is apparent that the number of Athletes in a RTP and providing Whereabouts, compared to the number of Athletes who are or could be tested, is often a very small proportion. We support and apply the belief that Athletes should be educated before being tested, and believe that this current minimum level for an education pool puts Athletes at risk.

We therefore recommend that the principles of minimum inclusion in the ‘Education Pool’ be changed (see below) to those discussed in various education groups, and that it be aligned to the statement made in Article 7.2 which states that ‘This includes all Athletes who are subject to testing and their Athlete support personnel....’.

We propose:

Athletes, as defined by an ADO’s anti-doping rules and who are subject to those rules, shall be considered as part of the Education Pool, and as a minimum the Education Pool should include;

- Athletes formally part of an RTP, NRTP or IRTTP
- Athletes defined as International- Level Athletes by their respective ADO
- Athletes defined as National-Level Athletes by their respective ADO
- Athlete attending a Major Games
- Athletes returning from a sanction

Further the above should then be referenced and amended throughout the document where it refers to a ‘minimum for an Education Pool’.

There is no mention of Athlete support personnel which should be included as a minimum. We strongly propose that the ISE now takes a proactive stance in addressing the needs of Athletes by ensuring that core ASP are also educated and informed. As a minimum the Education Pool should include coaches and

medical personnel associated with supporting or working with elite Athletes – those intending to compete at international level. (We believe that WADA has the resources to support the implementation of this)

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

CCES recommends changing the wording “It is recognized that the vast majority of *Athletes* wish to compete clean...” to “WADA recognizes that...”

Institute of National Anti-Doping Organisations

SUBMITTED

Graeme Steel, Chief Executive (Germany)
Other - Other (ex. Media, University, etc.)

Better wording: Education, as one prevention strategy as highlighted in the Code, seeks to prevent Athletes and other persons from committing Anti-Doping Rules Violations, Requiring Signatories to establish an Education Pool through a structured planning process that shall as a minimum, include Athletes in the Registered Testing Pool and Athletes under a suspension period.

In many cases it is simply unproductive (or all but impossible) to include some of the athletes serving suspensions in the Education Pool. ADOs should be able to not include such athletes for specified reasons perhaps requiring just the provision of basic information.

3.0 Definitions and interpretation (2)

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

- clarify the “**suspension period**” mentioned in the section a) of the third objective: e.g. Requiring Signatories to establish an Education Pool through the process outlined in Article 4, that shall as a minimum, include Athletes in the Registered Testing Pool, Athletes attending a Major Event/ International Sporting Competition, and Athletes under a suspension period.
- rephrase “**minimum requirements**” mentioned in the section c) of the third objective: e.g. c) Encouraging Signatories to reach all Athletes within its jurisdiction as it relates to education, including considering the benefits of educating a wider population through Values-Based Education programs to help instil the spirit of sport and foster a clean sport environment. This is to recognize.....
- replace “**potential stakeholders**” mentioned in the section d) of the third objective with clear description that is listed at the end of the paragraph: e.g. d) Recognizing the role of governments, educational institutions, researchers and other stakeholders in the field of clean sport Education and encouraging *Signatories* to engage and leverage the resources and expertise of these stakeholders;
- add a comment, which is currently in the introduction of the Part 2: E.g. Comment: Signatories should reflect on the role of Education within their organization and be clear on a vision and ultimate outcome they would like to see from their Education Program. This vision should inform the objectives that will be set in the education plan.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

Definitions, Event-Based Education:

The definition of Event-Based Education should be changed so that it is clear it refers to education at an event and not in the lead-up to it. The rationale for this is the current confusion as to which ADO is responsible for educating which level of Athlete. Changing this definition will significantly reduce this confusion and prevent further duplication of efforts. We propose; 'Any type of Education activity which takes place at an Event, or Competition'.

3.1 Defined terms from the 2015 Code that are used in the International Standard for Education: (2)**Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

3.1 Defined terms from the 2015 Code that are used in the International Standard for Education:

Athlete Support Personnel: Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other *Person* working with, treating or assisting an *Athlete* participating in or preparing for sports *Competition*.

Consider adjusting the definition of the “**Athlete support personnel**” (ASP) or change the definition in the World Anti-Doping Code:

Is every ADO responsible for educating all ASP? Can a limited definition be proposed for the ISE?

E.g ASP directly related to the relevant target group in the stakeholders education plan

- Are parents valid only for athletes under 18?

- Consider providing ADOs with guidelines to identify and prioritise the groups of ASP, while not imposing ADOs to educate all ASP;

- Consider acknowledging at the Code level the role of other stakeholders in educating majority of ASP, thus empowering ADOs to approach them and cooperate/support.

3.2 Defined terms specific to the International Standard for Education: (9)**Department of Health - National Integrity of Sport Unit**

SUBMITTED

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

“Education Program: This constitutes all Education activities undertaken by Signatories.”

Comment:

There appears to be some uncertainty around the difference between the Education Program and Education Plan. It currently reads as that the Education Plan describes the Education Program. Since it is the audit-able document, an inclusion of a definition for Education Plan would be helpful.

Definition of Guidelines for Education – it is unclear whether the guidelines will be mandatory for compliance assessment purposes or non-mandatory. Clarification that the guidelines are non-mandatory would assist.

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

A) Refine the term "**Education**":

- consider how to not limit the education to "prevention of intentional and unintentional doping",
- reflect education's role to helping fostering clean sport environment, character development and protecting clean athletes;

e.g. Education: In relation to clean sport is activities that support a learning process.

The combination of such activities shall be known as an Education Program, that shall be underpinned by the values of the spirit of sport to develop ethical sporting conduct and to help foster a clean sport environment. The main education activities can be further defined as:

1) Awareness -

B) Refine the term "**Educator**" mentioned in the section 3.2 Defined terms specific to the International Standard for Education to make sure that there is a mechanism to recognise the competence of educators trained by other Stakeholders, not limited to Signatories; this could be clarified also in the Article 7.2 of ISE;

e.g. **Educator**: A person who has been authorized by a Signatory to deliver elements of the education plan in the International Standard for Education. Educators should/shall be trained in relevant anti-doping knowledge or have their competency to deliver education assessed.

C) Consider to rename the term "**Event-Based Education**" to "Event-Related Education" mentioned in the section 3.2 Defined terms specific to the International Standard for Education:

D) Add to the term "**Guidelines for Education**" reference that it is a not mandatory document;

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

1) "Awareness" - the current phrase can be replaced to: highlighting topics/issues within the framework of anti-doping and values of the spirit of sport. --> Better to highlight the awareness (including public campaign) is composed of both rules and values matter.

3) Anti-Doping Education could be replaced to "Anti-Doping Rules-Based Education" to make it more specific. - The phrase can be changed to "...to ensure competence in all aspects related to anti-doping rules and to bring a behavioural change"

- Some clarifications necessary though some points can be incorporate in the Guideline rather than ISE as principle: a) Education, Education Program, Education Programs, Education activity, Education activities - differences in-between; use of plurals? Some wording are overlapped in intentions. b) "Education Pool" - Easy to understand the steps for streamlining and making the pool should be included in the Guideline.

c) "Educator" - authorized can be replaced to "certified" - indication of minimum requirement necessary - like completing ALPHA (or NADO's assigned platform) as an exemplified) "school programs" - unclear on intention. In Guideline, it is better to illustrate what it looks like.

In the Guideline, the detailed illustrations of these terms can be further illustrated.

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

3.2 Defined terms specific to the International Standard for Education:

Education: In relation to clean sport, the process of raising awareness, providing information, delivering anti-doping education underpinned by the values of the spirit of sport, to contribute to the prevention of intentional and unintentional doping. The components of education referenced here can be further defined as:

- 1) **Awareness** – highlighting topics/issues within the framework of anti-doping.
- 2) **Information** – providing accurate, up to date anti-doping material.
- 3) **Anti-Doping Education** – delivering high quality anti-doping training to ensure competence in all aspects related to anti-doping topics.
- 4) **Values-Based Education** – delivering activities that emphasize the development of an individual's personal values and principles. It builds the learner's capacity to make decisions based on moral reasoning.

Refine the term "**Education**":

- consider how to not limit the education to "prevention of intentional and unintentional doping",
- reflect education's role to helping fostering clean sport environment, character development and protecting clean athletes;

Education Pool: an identified list of target groups, determined through the process outlined in Article 4 of the International Standard for Education. At a minimum, it must include the *Registered Testing Pool* of each *Signatory* and *Athletes* serving a suspension period.

The term "*Athletes* serving a suspension period" need better explanation either here (3.2) or in 1.0 or in the 4.3.1 or in definitions; the practical implications of these requirements need explanation – when, where and how to reach out to these very specific persons; especially as this is a mandatory part of the ISE;

Event-Based Education: Any type of Education activity which takes place at or leading up to an *Event*.

a. Consider to rename the term "**Event-Based Education**" to "Event-Related Education" mentioned in the section 3.2 Defined terms specific to the International Standard for Education:

Guidelines for Education: A Level 3 document in the World Anti-Doping Program that provides guidance on all aspects of Education.

Add to the term "**Guidelines for Education**" reference that it is a not mandatory document;

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

1.0 Page 8

Program and Plan are used interchangeably throughout the ISE. If these terms are different, they require clear definition.

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

Event-Based Education: Consideration to rename the term “**Event-Based Education**” to “Event-Related Education” mentioned in the section 3.2 as this will include all education conducted in the lead to major games not just education conducted at major games.

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

· We suggest to make no distinction between the defined terms *Education* and *Education Program* and use the defined term *Education Program* only.

· *Education* is defined by wording which includes the term *education*, namely *anti-doping education* and *values-based education*. We feel it is better to take out this self-reference and to change *anti-doping education* and *values-based education* to *anti-doping training* and *values-based training*.

· We suggest to explicitly state in the definition that the *Guidelines for Education* are a non-mandatory document

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

CCES notes that in some cases, “Education Program” appears to refer to the defined terms but in some instances it appears to have been specifically edited so that it does not. Is there a reason for this change?

CCES recommends terms within the definition of “Education” which are defined terms under the ISE be identified as such: “The process of raising Awareness, providing Information, and delivering Anti-Doping Education underpinned by Values-Based Education. These components are further defined as...”

CCES recommends the following wording for the definition of “Education Program”: “The totality of Education activities undertaken by a given *Signatory*.”

In the definition of “Prevention,” the four strategies listed are italicized. Given that the italics formatting is typically reserved for defined terms from the Code, CCES recommends the italics formatting be removed. Even though these terms aren’t capitalized, the italics may cause confusion. Also, “education” is a defined term under the ISE, and therefore should be capitalized and underlined.

Institute of National Anti-Doping Organisations

SUBMITTED

Graeme Steel, Chief Executive (Germany)
Other - Other (ex. Media, University, etc.)

Education: In relation to clean sport, the process of raising awareness, providing information, delivering anti-doping education underpinned by the values of the spirit of sport, to contribute to the prevention of intentional and unintentional doping.

This is a circular definition where it defines "education" as "education". Suggest: In relation to clean

sport, the process of raising awareness, and providing information, which is underpinned by the values of the spirit of sport, contributing to the prevention of intentional and unintentional doping.

PART TWO: STANDARDS FOR EDUCATION (4)

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

a. Move the comment after the section “**Overview**” to the Part 1 as it doesn’t refer to the text of the section;

Anti-Doping Norway

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

Anti-Doping Norway strongly support that athletes should be heard and that their opinion and experience should be used for educational purposes. We also support that this should be mandatory and be reflected in mandatory documentation such as the Code and the Standard.

The word “educator” is used in the standard when addressing education, particularly towards young athletes. An athlete would not necessarily be a suitable tutor simply by being an athlete without any further tutorial education, thus we suggest avoiding the word “educator” (article 5.10 and 7.3). We suggest that the wording be revised so that it reads that athletes should preferably be used to communicate their thoughts concerning clean and fair sport and to convey their experiences.

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

CCES notes that many articles are worded not as “shall” but as “should.” As such, this could cause confusion for Signatories in terms of compliance (e.g. confusion regarding whether an action described in a “should” article is required or not) and reporting (e.g. in the event that WADA requests reporting on activities, is a Signatory to include activities described in “should” articles).

CCES recommends moving the “shoulds” to comments on related articles to support implementation and “go beyond the minimum requirements.”

Alternately, CCES recommends moving the “shoulds” to the Guidelines and make specific reference to the Guidelines, e.g. “for more information on implementation see Section # in the Guidelines...”

Conseil supérieur des sports

SUBMITTED

Matheo TRIKI, Sportif Rugby (Espagne)
WADA - Others

4.0

4.1.2 Signatories shall document their Education activities through an education plan. This shall be available for review on request by WADA [overview/summary to be provided in English or French].

4.1.3 The main activities related to developing an education plan are: a current situation assessment, prioritizing target groups, setting of clear objectives, documenting an action plan and outlining monitoring and evaluation procedures. Each of these is described below.

4.2 Current Situation Assessment

The assessment process shall consider three main strands:

Planning effective Education Programs

Developing an education plan

The objective of Article 4 is to set out the steps that are necessary to develop an education plan that fulfills the requirements of the International Standard for Education.

4.3 Prioritization of Target Groups

Based on the list of target groups identified above, Signatories shall conduct a process to identify the highest priority targets to be included in the Education Pool to which the Education Program will be delivered.

4.4 Objectives

The education plan shall include a clear statement of the overall objectives of the

Education Program.

In addition, the plan should identify specific objectives and activities for the target groups identified within the Education Pool. All objectives shall be measurable and time-specific.

4.5 Monitoring

The education plan shall include monitoring procedures for its activities in order to ensure that all aspects of the Education Program are recorded to aid reporting and evaluation. Guidance on monitoring procedures is provided in the Guidelines for Education.

6.0 Evaluating the effectiveness of education programs

6.1 Signatories shall evaluate their Education Programs on a yearly basis and maintain documentation related to this. The outcome of the evaluation will be made available to WADA upon request.

6.2 The evaluation shall be based on the objectives outlined in Article 4.4. The evaluation should determine to what extent these objectives have been met. Signatories should seek partnerships in the academic field or with other research institutions to provide support for evaluation and research purposes.

Comment to 6.2: The evaluation should inform the following year's education plan. The evaluation should be based on all available information and data, particularly the monitoring of the Education activities as set out in Article 4.5.

4.0 Planning effective Education Programs (2)

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)

Public Authorities - Government

SUBMITTED

Suggest some considerations that may impact the Education Program are structural and demographic rather than cultural. For example, the structure of Australian sport, and of individual sports, and the demographics of our athletes are more likely to impact our program in a sport than Australian culture.

TYPOS:

Overview first sentence – “Evaluate” should not be underlined.

Second paragraph – Awareness should be underlined.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

Article 4.2.1 – 4.2.3:We would recommend that this section is reordered slightly to better depict an effective planning process. Therefore, we propose the following structure: 4.2.1 System assessment 4.2.2 Identification of target groups 4.2.3 List of current education activities 4.2.4 Supporting agencies 4.2.5 Resources Further, we provide the following comments and proposed amendments to each section.

4.2.1 System Assessment - Consider adding in 'stages of Athlete development' to the system assessment, as this is critical to understand the potential opportunities for education. Also, the core (influential) ASP roles should be documented. We would also suggest that this is the first step, and that the statement on documenting current education activities becomes a new point – 4.2.3 where the current activities should be mapped against their system assessment. This will provide a helpful gap analysis which will then inform the education plan.

Therefore, we suggest the following wording: 4.2.1 System Assessment: Signatories shall describe the environment within which they operate, including the main stages of Athlete development, the core Athlete Support Personnel roles working with Athletes, the sports system/structures, and the national/international context as outlined in the Guidelines. Signatories shall then document all their current Education activities against the system assessment to develop a gap analysis as the first step in the education planning process.

4.2.2 Identification of Target Groups: Signatories shall list all potential target groups of their Education Programme including all those referenced in Article 18 of the Code.

4.2.3 List of current education activities: Signatories shall identify and document their current educational activities and map these against their system assessment and identification of target groups to demonstrate which areas of the sport system and target groups are being reached and where any gaps are. This gap analysis should then inform the Education Plan.

4.2.4 Supporting Agencies: Signatories shall identify other agencies/organisations that may be responsible for delivering clean sport Education or have the potential to deliver Education in the sport system and to help reach target groups not currently met. This should include National Federations.

4.2.5 Resources..... As is.

4.1 Developing an education plan (1)

Department of Health - National Integrity of Sport Unit

SUBMITTED

Luke Janeczko, Policy Officer (Australia)

Public Authorities - Government

Use of the words 'are necessary' implies the steps are mandatory for Code-compliance.

Suggest:

4.1.1 The objective of Article 4.2 is to set out the steps that will assist to develop an education plan that fulfils the requirements of the International Standard for Education.

4.2 Current Situation Assessment (5)

Department of Health - National Integrity of Sport Unit

SUBMITTED

Luke Janeczko, Policy Officer (Australia)

Public Authorities - Government

The article state "For youth athletes, programs should be values-based....."

Youth athletes is not defined in Code or IS – Code defines protected persons as youths - this should be consistent.

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

a. Reorder the sequence of actions of the section “**4.2. Current Situation Assessment**” – starting with target groups;

Rename the “System Assessment” to underline that it is the current system that’s being assessed;

Therefore, we propose the following structure:

4.2.1 System assessment

4.2.2 Identification of target groups

4.2.3 List of current education activities

4.2.4 Supporting agencies

4.2.5 Resources

Further, we provide the following comments and proposed amendments to each section.

4.2.1 System Assessment: Signatories shall describe the environment within which is operates, including the main stages of athlete development, the core athlete support personnel roles that work with athletes, the sports system/structures and the national/international context as outlined in the Guidelines. Signatories shall then document all their current Education activities against the system assessment to develop a gap analysis as the first step in the education planning process.

4.2.2 Identification of Target Groups: Signatories shall list all potential target groups of their Education Programme including all those referenced in Article 18 of the Code.

4.2.3 List of current education activities: Signatories shall identify and document their current educational activities and map these against their system assessment and identification of target groups to demonstrate which areas of the sport system and target groups are being reached and where the gaps are. This gap analysis should then inform the Education Plan.

4.2.4 Supporting Agencies: Signatories shall identify other agencies/organisations that may be responsible for delivering clean sport Education or have the potential to deliver Education in the sport system and to help reach target groups not currently met. This should include National Federations.

4.2.5 Resources..... As is.

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- "clean sport education" should be defined and the differences between Values-Based Education are unclear.

4.2.3 "ensuring an effective and achievable education plan" is very realistic description. It can be considered as contradictory to "high quality anti-doping training" for example stated in 3.2. It is better to clarify the "minimum standard" looks like in the Guideline because "achievable education plan" may not change the current status.

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

4.0 Planning effective Education Programs - 4.2 Current Situation Assessment

The assessment process shall consider three main strands:

4.2.1 System Assessment: *Signatories* shall document all their current Education activities as the first step in the education planning process. *Signatories* shall describe the environment within which it operates, including the sports system/structures and the national/international context as outlined in the Guidelines.

4.2.2 Identification of Target Groups: *Signatories* shall list all potential target groups of their Education Program including all those referenced in Article 18 of the *Code*. It shall also identify other agencies/organizations who may be responsible for delivering clean sport Education to these target groups or have the potential to deliver Education.

4.2.3 Resources: *Signatories* shall document all available resources to the Education Program. An important consideration in ensuring an effective and achievable education plan is to clearly document the capacity of *Signatories* to deliver the Education Program by assessing the human, financial and material resources available to deliver the plan.

These resources will then inform what is possible to deliver as part of the Education Program. *Signatories* will assign resources to activities accordingly based on the prioritization process outlined in Article 4.3.

a. Reorder the sequence of actions of the section “**4.2. Current Situation Assessment**” – starting with target groups;

Rename the “System Assessment” to underline that it is the current system that’s being assessed;

4.2.1 Reword the first sentence: *System Assessment: Signatories* shall outline or describe.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

CCES suggests rewording Article 4.2.3: “Resources: Signatories shall document all available human, financial and material resources available to the Education Program. An important consideration in ensuring an effective and achievable Education Plan is to clearly document the capacity of Signatories to deliver the Education Program.”

4.3 Prioritization of Target Groups (7)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

4.3.1 Athletes in RTP are Top Level Athletes, they are tested a lot compare to other athletes and are already educated; it should not be mandatory to include RTP or TPs athletes in the Education Pool, they are not the priority target of an Education program.

Council of Europe

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

SUBMITTED

1) Add the risk assessment and relation to major events calendar to the process of “**4.3. Prioritization of Target Groups**”;

2) The term “*Athletes* serving a suspension period” need better explanation either here in the **4.3.1** or in definitions; the practical implications of these requirements need explanation – when, where and how to reach out to these very specific persons; especially as this is a mandatory part of the ISE;

The reference to school programs should be removed from the paragraph two of the section **4.3.1** to avoid controversy about ADOs relations with formal education systems, and also considering that the school may be seen as a part of early stage of athlete pathways depending of sport system in different countries;

E.g. For youth athletes, programs should be values-based, with a focus on integrity and instilling the spirit of sport, ideally through school programs or sports clubs and through the early stages of athlete pathways within the sport system.

3) As the ASP is not directly responsible for the Code implementation, the first paragraph of the section **4.3.2** needs rewording in less demanding manner;

Suggest removing the word ‘educate’ from text

E.g.

....it is the Athlete Support Personnel’s mandatory responsibility to counsel Athletes regarding anti-doping polices and rules adopted pursuant to the Code. Signatories....

4) Consider adjusting the definition of the “**Athlete support personnel**” (ASP) or change the definition in the World Anti-Doping Code:

- Is every ADO responsible for educating all ASP? Can a limited definition be proposed for the ISE?

- Are parents valid only for athletes under 18?

- Consider providing ADOs with guidelines to identify and prioritise the groups of ASP, while not imposing ADOs to educate all ASP;

- Consider acknowledging at the Code level the role of other stakeholders in educating majority of ASP, thus empowering ADOs to approach them and cooperate/support.

5) The second paragraph of the section **4.3.2** may need revision in order to clearly define that different ASP groups shall be considered, while prioritization should be given to some of them;

6) The list of target groups in the **4.3.4** could be reordered alphabetically;

7) The term “sport administrator” in the **4.3.4** could be defined or subdivided to, e.g., directors, officers, employees and volunteers of Signatories;

Antidoping Switzerland

Ernst König, CEO (Switzerland)
NADO - NADO

SUBMITTED

The ISE should clearly mention that athlete and ASP populations that are likely to be exposed to a higher risk of doping (e.g. sports or nations) should be prioritized for education. This is likely to go beyond the smaller number of athletes in testing pools and with sanctions.

4.3.2: According to 4.3.2 it is the «ASP’s mandatory responsibility to educate ... athletes”. This does not reflect Code articles 18.3.3 and 21.2! No mentioning of “mandatory” there.

Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

SUBMITTED

- Educating the Athlete Support Personnel is the priority along with those athletes tested. However, though it is mentioned as a "mandatory responsibility", reaching the ASP is very difficult in reality.--> it is not clear whose responsibility this will be? IF? NFs? NADOs? - this can also be

mentioned.

- 4.3.1 "For youth athletes, programs should be values based" --> possible change to "For youth athletes, the Values-Based Education is a priority".
- In the Draft3 2021Code, "The Recreational Athletes" as the new category of athlete is included. Hence, specifically "The Recreational Athletes" should be mentioned.

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

"4.3 Prioritization of Target Groups

Based on the list of target groups identified above, *Signatories* shall conduct a process to identify the highest priority targets to be included in the Education Pool to which the Education Program will be delivered.

4.3.1 *Athletes*: *Signatories* shall consider *Athletes* as defined in its anti-doping rules and who are subject to those rules, for inclusion in the Education Pool. As a minimum, *Signatories* shall include *Athletes* who are included in their *Registered Testing Pool* as part of the Education Pool and *Athletes* serving a suspension period." - Add the risk assessment and relation to major events calendar to the process of "**4.3. Prioritization of Target Groups**"; - The term "*Athletes* serving a suspension period" need better explanation either here in the **4.3.1** or in 1.0 or in 3.2. or in definitions; the practical implications of these requirements need explanation – when, where and how to reach out to these very specific persons; especially as this is a mandatory part of the ISE;

"For youth athletes, programs should be values-based, with a focus on integrity and instilling the spirit of sport, ideally through school programs and through the early stages of athlete pathways within the sports system." - The reference to school programs should be removed from the paragraph two of the section **4.3.1** to avoid controversy about ADOs relations with formal education systems, and also considering that the school may be seen as a part of early stage of athlete pathways depending of sport system in different countries;

"4.3.2 *Athlete Support Personnel*: As per Articles 18.3.3 and 21.2 of the *Code*, it is the *Athlete Support Personnel's* mandatory responsibility to educate and counsel *Athletes* regarding anti-doping policies and rules adopted pursuant to the *Code*. *Signatories* shall, within their means, ensure that *Athlete Support Personnel* are well informed of the standards required to ensure they are able to counsel their *Athletes* accordingly." - As the ASP is not directly responsible for the Code implementation, the first paragraph of the section **4.3.2** needs rewording in less demanding manner;

"*Signatories* shall consider *Athlete Support Personnel* of the *Athletes* identified above, for inclusion in the Education Pool. The most influential *Athlete Support Personnel* of the *Registered Testing Pool* should be given priority in the consideration process to be included in the Education Pool. As defined in the *Code*, the following groups shall be considered as part of this process:" - The second paragraph of the section **4.3.2** may need revision in order to clearly define that different ASP groups shall be considered, while prioritization should be given to some of them;

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

4.3.2. It is not the Athlete Support Personnel's mandatory responsibility to educate. This is up to the Educators. We suggest to change the wording to: "it is the Athlete Support Personnel's mandatory responsibility to foster a clean sport culture."

4.3.4. We suggest to put the examples in alphabetical order.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)

NADO - NADO

SUBMITTED

With respect to Article 4.3.2, Athlete Support Personnel is currently an extremely broad term and this Article offers little guidance on prioritizing audiences within this group. A comment here about prioritizing education of Athlete Support Personnel who are working with Athletes participating in national and/or international competition would be helpful to ensure a minimum threshold is met.

Article 4.3.4 mentions “young people.” Is this intentionally broad? Post-secondary student-athletes should be included in the list as a separate cohort. University sports staff/lecturers are specifically mentioned, but not the student-athletes themselves. Perhaps “young person” is intended to capture them (as “schools” are mentioned), but given that they typically would be 18 years of age or older – legal adults in many countries – “young people” doesn’t seem like an accurate term to capture this group.

5.0 Implementing effective education programs (1)**Anti Doping Denmark**

Jesper Frigast LARSEN, Legal Manager (Denmark)

NADO - NADO

SUBMITTED

- The Anti-Doping Charter of Athlete Rights:

THIRD BULLET: Should be revised and aligned with eventual changes proposed for the Anti-Doping Charter of Athletes rights.

Add: "& responsibilities"

Fundamental rights go hand in hand with fundamental responsibilities. Therefore, it is recommended to rename the charter and add a separate section named Athletes Responsibilities. Pls. see separate comment.

- Risks with medications and supplements, including health consequences:

SEVENTH BULLET: Delete the phrase “including health consequences” from the seventh bullet point of **5.2**; detailed description of this topic should be given in the Education Guidelines

- *Testing* procedures, including urine, blood and the biological passports:

NINTH BULLET: Delete the phrase “including urine, blood and the biological passports” from the ninth bullet point of **5.2**; detailed description of this topic should be given in the Education Guidelines;

5.2 (8)**World Rugby**

David Ho, Anti-Doping Science and Results Manager (Ireland)

Sport - IF – Summer Olympic

SUBMITTED

We propose that the list of education topics in the Code/ISE is amended to specifically acknowledge recreational illicit drug use either as a separate category or within existing categories. Regardless of the Prohibited List categorisation of substances such as cocaine, cannabinoids and amphetamines, ADRVs for these substances remain high across sport, and this wastes considerable resources in prosecuting cases that are unlikely to be related to performance-enhancement, as well as potentially skewing perceptions of the objectives of the anti-doping movement. The change to the status of

cannabidiol, and recent commercial proliferation of cannabis-related supplements further exacerbates the need for this change. Additionally, the bullet point that currently reads “Requirements of a Registered Testing Pool, including Whereabouts and use of ADAMS” would be better as ‘whereabouts requirements, including RTP and use of ADAMS where applicable’ to take account of the range of whereabouts requirements that are wider than just the RTP.

ISU

SUBMITTED

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

- Requirements of a ~~registered testing pool, including Whereabouts~~ and use of ADAMS

Requirement for Athletes in RTP /TP including Whereabouts is specific to defined athletes; this information should be delivered to these Athletes specifically and not be part of the Education program.

Department of Health - National Integrity of Sport Unit

SUBMITTED

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

We suggest the article be amended to include:

‘Signatories shall include, at a minimum, the following topics...’

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

- 1) Add “economic” to the list of consequences of doping in the fourth bullet point of **5.2**;
- 2) Delete the phrase “including health consequences” from the seventh bullet point of **5.2**; detailed description of this topic should be given in the Education Guidelines
- 3) Delete the phrase “including urine, blood and the biological passports” from the ninth bullet point of **5.2**; detailed description of this topic should be given in the Education Guidelines;

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- Even though this part illustrates the topics to be covered, it is better to state how depth the topic should be covered and depending on target groups, some topics can be eliminated. The suggested revise text : "...as outlined in Article 18.3.1 of the Code. However, the topics and methodology of covering these topics must be tailored to the target groups identified in 4.3".
- "Ethical reasoning" could also be mentioned.

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

Delete the phrase “including health consequences” from the seventh bullet point of **5.2**; detailed description of this topic should be given in the Education Guidelines

Delete the phrase “including urine, blood and the biological passports” from the ninth bullet point of **5.2**; detailed description of this topic should be given in the Education Guidelines

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

We suggest the following addition -

Consequences of doping including health, social, psychological, economic and sport sanctions

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

CCES suggests rewording the fourth bullet from “Consequences of doping including health, social, psychological and sport (sanctions)” to “Consequences of doping including health (including mental health), social, sport (sanctions) and economic consequences.”

The eight bullet appears to be conflating a number of issues into one. CCES recommends changing “Risks with medications and supplements, including health consequences” to three separate points, as follows:

- The risk of inadvertent doping violations from prohibited but medically necessary medications
- The risk of doping violations through the improper use of medications to alter performance
- Risks associated with supplements

In the final bullet, CCES suggests changing “Speaking up to share concerns about doping” to “Reporting, or opportunities to share concerns about, doping.”

5.3 (5)

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

SUBMITTED

“The topics identified in Article 5.2 shall be delivered in full to Athletes and Athlete Support Personnel in the Education Pool.”

Suggest that this is too prescriptive and that the words need to be adjusted to reflect that education messages will be tailored to the needs of groups in the Education Pool – including being tailored to athletes at different levels.

For example, not all athletes included in the Education Pool will need to know about the requirements of the RTP and use of ADAMS.

“Values-Based Education should be the underpinning component of all activity.”

Under the current definition of Values Based Definition in section 3.2 (which refers to pedagogical activities which build the learners capacity to make decisions based on moral reasoning), it would be impractical to have Values Based Education underpin all activity.

Suggest that values-based messaging may be more appropriate to underpin all activity, eg: “Signatories should include the values of the spirit of sport and promotion of integrity as an underpinning component of all activity.”

Alternatively, the statement could recognize that there are some instances where providing knowledge of the rules is paramount to values based education. While all efforts are made to include some values based education in all activity, saying that it should be THE underpinning component may not be appropriate at all times.

For example, at the senior elite level, if someone has not received education before, ensuring they know the rules that apply to them takes priority over values based education, especially for older athletes where values are largely already determined.

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

Consideration to be given to practical implementation of all 11 topics in education programs, especially when an athlete is included in the RTP with short notice and/or for short period of time; **5.3** could be revised to reflect this concern; or a further comment added to explain this.

E.g.[Comment: Where an athlete is included in the Education Pool at short notice and/or for a short period Signatories shall ensure they have a mechanism to inform or educate such athletes, so they are not put at risk of an ADRV. This may require an adaption to the normal education programme or planned activities.

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- The same with the comment 5.2 - it is better to mention (possibly in the Guideline for more details) some topics do not need to be covered in depth and full as relevancy and significance.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

Suggest that greater flexibility exists to allow education content to be tailored to the specific audience and their respective needs. E.g. where youth athletes are concerned, the additional focus should be placed on values-based education in lieu of considerable time spent on the more complex item of the athlete biological passport.

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

5.3 The topics identified in Article 5.2 shall be delivered in full to *Athletes and Athlete Support Personnel* in the Education Pool. *Signatories* shall ensure that all four components of Education are considered when delivering these topics in order to ensure messages are tailored specific to the audience. Values-Based Education should be the underpinning component of all activity:

Consideration to be given to practical implementation of all 11 topics in education programs, especially when an athlete is included in the RTP with short notice and/or for short period of time; **5.3** could be revised to reflect this concern;

5.4 (3)

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

Consideration should be given to the reference to schools in the **5.4** as IFs have no direct links with formal education system; replace the phrase starting with “through school programs...” with “through school programs or sports clubs, at early stage of athlete pathways, ideally in cooperation with the relevant public authorities, sport clubs and other entities;

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

5.4 In relation to other target groups identified in Article 4.3.4 who have been included in the Education Pool, *Signatories* should tailor the topics and messages specific to each group. A focus should be maintained on Values-Based Education with the objective of instilling the spirit of sport, particularly in young people through school programs, ideally in cooperation with the relevant public authorities.

Consideration should be given to the reference to schools in the **5.4** as IFs have no direct links with formal education system; replace the phrase starting with “through school programs...” with “at early stage of athlete pathways, ideally in cooperation with the relevant public authorities, sport clubs and other entities;

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

Consideration should be given to the reference to schools in this article. As IFs and some NADO'S have no direct links with formal education system due government structures etc; school programs could be replaced with “at early stage of athlete pathways, ideally in cooperation with the relevant public authorities, sport clubs and other organisations”.

5.5 (2)**Department of Health - National Integrity of Sport Unit**

SUBMITTED

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

This appears to contradict section 5.3 which says that the topics shall be delivered in full to Athletes and ASP.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

Appears to contradict 5.3 which lists the topics that must be delivered in full to all athletes and support personnel.

5.6 (3)**Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- More strong wording for the Athletes with impairments can be done. "Signatories shall tailor Education activities ..."

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Specific reference to Athletes with an impairment is welcomed.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

Article 5.6 says that "Signatories shall take particular note of the need to tailor Education activities to Athletes with impairments..." but does not imply any specific action nor implications for compliance or program delivery. Perhaps this Article should be clearer and more direct in the obligation to provide such education: "Signatories shall tailor Education activities to Athletes with impairments and other target groups within the Education Pool in order for them to be able to fully access and experience Education as required."

5.7 (3)

Council of Europe

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

SUBMITTED

If the term "Protected persons" will be introduced in the Code, consider how it may impact the reference to Minors in the section **5.7**;

Doping Authority Netherlands

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

SUBMITTED

We suggest to change the term *Minors* into *Protected Persons*, which is in line with the Code.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

Article 5.7 uses the term "Minors" for the first and only time, while "young people" is used previously. Is the use of "Minors" here distinct from the "young people" mentioned previously?

5.9 (7)

World Rugby

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

SUBMITTED

With reference to the involvement of athletes in education, we support this idea but consider that more emphasis could be placed on the dual responsibility of (i) ADOs to make it easier for athletes to

volunteer to get involved in education, and conversely (ii) athletes to make themselves available to support educational activities.

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

In the section **5.9** replace the first part with “*Signatories* should train and shall authorize Educators” - to allow other entities to do training, while ADOs will have to recognise their competence;

In the section **5.9** revise the reference to Athletes – “*Signatories* should consider using *Athletes* as ambassadors for clean sport messages.

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- A bit more concrete examples for "ambassadors for clean sport" can be stated - possibly in the Guideline at minimum.

- Signatories "shall" rather than "should train and authorize"

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

5.9 *Signatories* should train and authorize Educators who will be responsible for educating the target groups in their Education Pool. Educators should be competent in Values-Based Education and all the topics outlined in the *Code*, International Standard for Education and Guidelines. *Signatories* should consider using *Athletes*, particularly more senior or retired *Athletes*, as Educators or at least as ambassadors for clean sport messages:

In the section **5.9** replace the first part with “*Signatories* should train and shall authorize Educators” - to allow other entities to do training, while ADOs will have to recognise their competence;

In the section **5.9** revise the reference to Athletes – “*Signatories* should consider using *Athletes* as ambassadors for clean sport messages.

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

We suggest to transfer this article to the Guidelines. Furthermore, we feel Educators should primarily be chosen based on their education skills, not based on their elite athlete experience.

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

In Article 5.9, CCES sees there is perhaps there is room for guidance as to when would it be appropriate/not appropriate to use current or former athletes as part of education sessions. Related to this, consider if there are there ethical concerns regarding an Anti-Doping Organization compensating athletes for participating in anti-doping education.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

We believe that ‘Educators should be competent...’ should be changed to ‘...shall be competent...’. It is unfair to Athletes and could potentially put them at risk if the person responsible for delivering education has not been trained or assessed in any way to do so. Similar to testing, and other areas of sport, we would not subject an Athlete to the testing process with untrained people nor would be advise an Athlete to seek support from an untrained/unqualified medic. Athletes deserve assurance that the information they have access to or the education they are receiving is correct and factual. The consequences for misinformation to an Athlete could end their careers.

As a minimum, a statement should be added that says only people with relevant anti-doping experience that have been authorised by their ADO can deliver education.

5.10 (4)**Department of Health - National Integrity of Sport Unit**

SUBMITTED

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

“Signatories should also consider involving Athletes in the delivery of Education activities where possible, including training them as Educators as referenced in 5.10”

Reference to 5.10 should be replaced with 5.9

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

Consider deleting the section **5.10** and move it to the Education Guidelines or simplify the requirements “to consult, obtain feedback from athletes”

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

The article reference of 5.10 (at the end of this paragraph) is incorrect and should read 5.9.

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

Given that Article 5.10 is worded as something Signatories “should” do, CCES suggests this Article becomes a comment to 5.9, rather than a separate article.

6.0 Evaluating the effectiveness of education programs (4)**Council of Europe**

SUBMITTED

Council of Europe, Sport Convention Division (France)

Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

The title of the section **6.0 Evaluating the effectiveness of education programs** could be revised to “6.0 Monitoring of education programs”; and consequently changed from evaluation to monitoring in 6.1 and 6.2;

Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

SUBMITTED

- In the Guideline, the evaluation criteria can be mentioned to ensure the learners' competencies in understanding of the Code, for example.

Anti Doping Denmark

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

SUBMITTED

6.0 Evaluating the effectiveness of education programs

The title of the section **6.0 Evaluating the effectiveness of education programs** could be revised to “6.0 Monitoring of education programs”; and consequently changed from evaluation to monitoring in 6.1 and 6.2;

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

The title of Section **6.0 Evaluating the effectiveness of education programs** could be revised to “6.0 Monitoring of education programs”; and consequently changed from evaluation to monitoring in 6.1 and 6.2;

6.2 (5)

World Rugby

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

SUBMITTED

This may need to define more clearly what the intended outcome/standard of evaluation is. A simple review/feedback survey may be considered sufficient (at least while the ISE is in its first iteration) as a minimum requirement, but it is at a very different end of the evaluation spectrum from a validated scientific study (which would seem the intention of the point made around academic partnerships). The ISE must of course account for resource limitations across ADOs but it should also encourage the use of scientific rigour as a gold standard. Money spend on an ineffective programme does little more than place a tick in the compliance box, and may let athletes down. Basic evaluation is a good first step but all organisations should be striving to contribute to the evidence base.

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

SUBMITTED

“Signatories should seek partnerships in the academic field or with other research institutions to provide support for evaluation and research purposes.”

Suggest this should say “where possible or relevant”

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

The section 6.2 could be revised in order to not make an impression that every ADO need a huge scientific paper every year to fulfil this requirement; ADOs need to understand that this monitoring exercise can be simple;

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

Due to the potentially significant costs which may be incurred in this area, it is our suggestion that 'where possible' is included as outlined below: "Signatories should seek partnerships in the academic field or with other research institutions to provide support for evaluation and research purposes where possible".

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

The section 6.2 could be revised in order to not make an impression that every ADO are required to conduct huge changes; ADOs need to understand that this monitoring exercise can be simple;

PART THREE: ROLES & RESPONSIBILITIES, COOPERATION AND ACCOUNTABILITY OF SIGNATORIES (3)

Swedish Sports Confederation

SUBMITTED

Tommy Forsgren, Results Management Manager (Sweden)
NADO - NADO

art 8.1 The SSC suggests WADA to establish a web- based “service center” where signatories can report and share their Education plans and Education Programmes to other Signatories.

Conseil supérieur des sports

SUBMITTED

Matheo TRIKI, Sportif Rugby (Espagne)
WADA - Others

The objectives of Article 7 are; one, to provide clarity on the scope of the responsibility for each Signatory as it relates to their primary functions for Education; two, to outline the means by which cooperation can be achieved in order to avoid duplication and maximize efforts and effectiveness of Education Programs; and three, to outline the Accountability framework by which Signatories will be held accountable in relation to the International Standard for Education.

7.2 National Anti-Doping Organizations (NADOs)

Each National Anti-Doping Organization (NADOs) shall be the authority on Education within their respective countries.

Each National Anti-Doping Organization shall devise a program that focuses on target groups who are under their jurisdiction. This includes all Athletes who are subject to Testing and their Athlete Support Personnel as well as all other groups identified as the Education Pool in Article 4.

7.3 International Federations

International Federations shall ensure that Education is provided for all International- Level Athletes as determined by their own criteria in reference to Article 4.3.2 of the International Standard for Testing and Investigations.

At International Events where Testing will take place, the International Federation shall consider Event-Based Education at all Events under their control where they have Testing authority. This should be done in cooperation with the local National Anti-Doping Organization and National Federation (and Major Event Organizations where applicable). In order to increase the effectiveness of Education, International Federations shall require Athletes and their Athlete Support Personnel participating at International Events to be educated in advance of the event and in accordance with Article 5 of the International Standard for Education.

7.4 Major Event Organizations

The Major Event Organizations shall ensure provision of Education activities for the Events that are directly under their jurisdiction as per Article 20.6.7 of the Code.

Major Event Organizations shall conduct Event-Based Education at all Events under their control where they are the Testing Authority. Major Event Organizations shall require Athletes and Athlete Support Personnel competing and participating at their Events to be informed on anti-doping ahead of the Event. This shall be done in cooperation with the local organizing committee, National Anti-Doping Organization and relevant International and National Federations.

Event-Based Education also has benefits in reaching a wider audience with the clean sport message, including the general public and media. Further guidance on delivering effective Event- Based Education can be found in the Guidelines for Education.

7.5 National Olympic Committees/National Paralympic Committees

Where a National Anti-Doping Organization does not exist, the National Olympic Committee (or, as applicable, the National Paralympic Committee) will be the authority on Education in their respective countries, as per Article 20.4.6 of the Code and be subject to International Standard for Education Article 7.2.2.

The National Olympic Committee (or, as applicable, the National Paralympic Committee) shall cooperate with the applicable National Anti-Doping Organization, shall ensure that Athletes and Athlete Support Personnel selected to participate in the Olympic/Paralympic Games (or any Event

7.6 Regional Anti-Doping Organizations (RADOs)

Regional Anti-Doping Organizations shall support member countries to conduct

Education Programs. It shall promote Education as per Article 21.3.6 of the Code.

Regional Anti-Doping Organizations shall work with governments and National Olympic Committees within their regions to provide support for the coordination and delivery of Education Programs.

RADOs should be a central knowledge center for Education whereby they collect all relevant content and material related to NADO Education Programs in their region and to make this available for all.

7.7 World Anti-Doping Agency (WADA)

WADA shall provide Education materials for use by Signatories or to be used by any other Person directly as per Article 20.7.6 of the Code. WADA shall support its stakeholders to develop and deliver effective Education Programs. WADA shall be responsible for ensuring compliance with the International Standard for

Education and the Code through the Code compliance process and in line with the International Standard for Code Compliance by Signatories.

8.0 Cooperation with and recognition of other Signatories

8.1 Signatories shall coordinate their Education efforts to avoid overlapping activities and to

Clear agreement on roles and responsibilities for Event-Based Education shall be agreed in advance. This should be done in accordance with the roles and responsibilities outlined in Article 7.

Signatories shall share information on their Education Programs with other relevant Signatories, specifically at a minimum, their education plans.

Recognition of Education

Signatories shall institute a recognition process whereby they will acknowledge the Education activities carried out by another Signatory provided that these activities have been carried out in accordance with Article 5 of the International Standard for Education. Signatories shall make their Education activities available to other Signatories through the publication of their education plan in English or in French.

9.0 Accountability

including the status of all objectives set as part of this plan. b) The Code compliance process

International Standard for Education. Education activities targeting the Education Pool must be outlined in the education plan. For Athletes and Athlete Support Personnel not included in the Education Pool, a clear rationale must be provided for this with a description of how this will be rectified in the future. It is mandatory for Athletes in the Registered Testing Pool and Athletes currently serving a suspension period to be included in the Education Pool.

The education plan shall endeavor to focus on the positive aspects of clean sport, focusing on the avoidance of inadvertent doping for those subject to anti-doping rules in the first instance, while also acknowledging that the vast majority of Athletes wish to compete clean, with Education activities supporting them to do this directly, or indirectly through the Education of other target groups.

The education plan shall identify an Education Pool as described in Article 4 of the

University of Stirling

Paul Dimeo, Senior Lecturer (UK)

Other - Other (ex. Media, University, etc.)

SUBMITTED

I agree wholeheartedly with the statement on p.4 that

"An Athlete's first experience with anti-doping should be through Education rather than doping control."

I also think this is essential for protecting athletes' rights and welfare.

However, I do question whether the remainder of the document focuses sufficiently on that aspiration, especially as many countries are both widening testing to non-elite groups and seriously considering criminalisation. We all know that inadvertent doping is a serious issue that requires education. We also know that some countries do not have the resources or political will to implement anti-doping seriously. The ISE is an opportunity for a global framework that ensures all athletes have sufficient knowledge to make the right choices.

I also question whether the focus on ASP is appropriate. It seems to assume that ASP are supportive of anti-doping, whereas in fact the opposite can be the case. Athletes need to be educated to be critical of the advice they get from coaches, doctors, parents etc, and to be resilient to peer pressure.

Education seems central to maintaining the integrity and fairness of anti-doping. I hope this document can be revised in order to make obligatory before testing, to include resilience and risk reduction strategies, and to ensure athletes have a reason for investing themselves in anti-doping when the temptations of success are probably much stronger.

Research from other contexts can be used to develop such strategies.

7.0 Roles & responsibilities of Signatories (1)

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

Replace the text of 7.1.1 with the new 2021 Code;

7.1 Objective (1)

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

7.1.1 Code Article 18.1 states that: “All Signatories shall within their means and scope of responsibility and in cooperation with each other, plan, implement, evaluate and monitor information, Education and prevention programs for doping-free sport”: Replace the text of 7.1.1 with the new 2021 Code;

Each *National Anti-Doping Organization* shall devise a program that focuses on target groups who are under their jurisdiction. This includes all *Athletes* who are subject to *Testing* and their *Athlete Support Personnel* as well as all other groups identified as the Education Pool in Article 4: The second sentence of the section 7.2 would need adjustment in case changes to ASP and Article 4 of ISE would be agreed.

7.2 National Anti-Doping Organizations (NADOs) (4)

Department of Health - National Integrity of Sport Unit

SUBMITTED

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

“overlap considerably with other Signatories,” – Signatories should be italicized

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

In the first sentence of section 7.2 clarify that it refers to the anti-doping education within the context of ISE; E.g. Each National Anti-Doping Organization (NADOs) shall be the authority on Education as it relates to clean sport in accordance with the International Standard for Education within their respective countries.

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- In the Guideline, the Educator training and education (and recertification/ re-authorisation) can be illustrated in details in order to avoid the different understanding of the rules in particular.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

The second paragraph conflicts with the minimal requirements for those to be included in the Education Pool. We refer to our earlier comments on the minimum inclusion in the Education Pool. We reference in particular the statement *'This includes all Athletes who are subject to Testing and their Athlete Support Personnel'*.

7.3 International Federations (6)

World Rugby

SUBMITTED

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

We support the amendments to International Federation responsibilities, particularly with regards to flexibility on providing education at events. However, at the start of paragraph 2, we would propose removing the text "at international events where testing will take place", given that this point is non-mandatory anyway.

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

In the second sentence of 7.3 and as proposed already in the definitions, consider replacing "Event-Based" to "Event-Related";

In the third sentence of the section 7.3 more consideration should be given to the definition of an International Event, e.g. are club competitions international?

In the section 7.3 a reference to Education Guidelines for IF-NF-NADO cooperation could be included;

Section 7.3 should describe the principle of recognition by IFs of the education done by NADO (and RADO?) as required by the section 8.2 of ISE;

Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- As per pre-event education (where it says "In order to increase the effectiveness of Education..."), one consideration for the IFs roles and responsibilities is to state that:"IF may like to make a policy for education as mandatory before accessing accreditation of highest IF event. This should be incorporate with the local NADO's existing education programme".

- the same sentence from 7.4 can also be mentioned for IFs - i.e. "reaching a wider audience with the clean sport message".

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

7.3 International Federations

International Federations shall ensure that Education is provided for all *International-Level Athletes* as determined by their own criteria in reference to Article 4.3.2 of the International Standard for Testing and Investigations.

At *International Events* where *Testing* will take place, the International Federation shall consider Event-Based Education at all *Events* under their control where they have *Testing* authority. This should be done in cooperation with the local *National Anti-Doping Organization* and National Federation (and *Major Event Organizations* where applicable). In order to increase the effectiveness of Education, *International Federations* shall require *Athletes* and their *Athlete Support Personnel* participating at *International Events* to be educated in advance of the event and in accordance with Article 5 of the International Standard for Education.

The *International Federation* shall require National Federations (and Regional Federations where appropriate) to conduct Education in cooperation with the applicable *National Anti-Doping Organization* as per Article 20.3.12 of the *Code*.

Comment to 7.3: Nothing prevents an International Federation from educating Athletes under its jurisdiction who are not International-Level Athletes, if it sees fit, e.g., where they are competing in an International Event. International Federations are required to ensure that Event-Based Education programs conducted on their behalf by other Signatories, National Federations or other third parties are done so to a high standard.:

In the second sentence of 7.3 and as proposed already in the definitions, consider replacing “Event-Based” to “Event-Related”; In the third sentence of the section 7.3 more consideration should be given to the definition of an International Event, e.g. are club competitions international? In the section 7.3 a reference to Education Guidelines for IF-NF-NADO cooperation could be included; Section 7.3 should describe the principle of recognition by IFs of the education done by NADO (and RADO?) as required by the section 8.2 of ISE;

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

Section 7.3 should describe the principle of recognition by IFs of the education done by NADO as required by the section 8.2 of ISE;

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

We refer to our earlier comment on the definition of Event-Based Education and our belief that this should refer specifically to education activities at an Event, not prior to it.

7.4 Major Event Organizations (2)

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

We feel it is not feasible to state that “Major Event Organizations shall conduct Event-Based Education at all Events under their control where they are the Testing Authority.” We suggest to change the wording to “Major Event Organizations should consider conducting Event-Based Education at all Events under their control where they are the Testing Authority”.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

We propose that reference be made to the publication of anti-doping rules and procedures by MEOs being done in a timely manner, and as a minimum 12 months before the event is due to start. This will then allow ADOs the time to produce relevant anti-doping information or education specific to the Games in which Athletes or ASP intend to participate in.

7.5 National Olympic Committees/National Paralympic Committees (1)**Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

- change the order of paragraph "Where a National Anti-Doping Organization..." and the paragraph of "The National Olympic Committee..."

8.0 Cooperation with and recognition of other Signatories (1)**World Rugby**

SUBMITTED

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

We support the principle of mutual recognition of education plans/programmes stated in the ISE, but retain some concern around the practical application of this, particularly for team sports where players are transferred from one territory to another. Two players of the same age playing in the same team could have had very different historical exposure to education if they have passed through different educational pathways in their own countries. Although the mandated education plans provide a record of education that theoretically should mitigate major discrepancies between players/countries, in practice (at least initially) such consistency may not exist. This will place a responsibility on the team/NADO to evaluate the non-national player's education history, and for them to be able to easily obtain this from the player's home NADO.

Though we acknowledge that the ISE can only be the first step in a long process towards consistent education, a system of accreditation (of programmes) would seem a crucial long-term goal. Without this, mutual recognition is likely to be a very inexact science (and in most cases largely based on trust). It is crucial that athletes are not let down by education that looks impressive on paper, but has negligible practical impact.

8.1 (3)**Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

b) Unclear sentence - who should make an agreement whom? -- "Clear agreement shall be agreed in advance..." --> replace this sentence to "Clear agreement between the IFs or Major Event Organiser and the NADO concerned shall be made on the roles and responsibilities for Event-Based Education".

Swedish Sports Confederation

SUBMITTED

Tommy Forsgren, Results Management Manager (Sweden)
NADO - NADO

art 8.1The SSC suggests WADA to establish a web- based "service center" where signatories can report and share their Education plans and Education Programmes to other Signatories.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

c) consider including the following amendment, ‘.... *specifically, at a minimum, an overview or summary of their education plans*’

8.2 (6)

Department of Health - National Integrity of Sport Unit

SUBMITTED

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

There is a risk that NADOs with more advanced education programs may be required to acknowledge education programs that, whilst compliant, may not satisfy the NADO's requirements for its athletes. This strengthens the need for partnership internationally to boost the standard of education worldwide.

Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

The process mentioned in the 8.2 should be better described to avoid confusion; for example a reference to a central clearinghouse or WADA approved lists of recognised programs or lists of recognised ADOs or lists of educators or lists of eLearning programs;

Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)
NADO - NADO

8.2 Recognition of Education

Signatories shall institute a recognition process whereby they will acknowledge the Education activities carried out by another *Signatory* provided that these activities have been carried out in accordance with Article 5 of the International Standard for Education. *Signatories* shall make their Education activities available to other *Signatories* through the publication of their education plan in English or in French.

The process mentioned in the 8.2 should be better described to avoid confusion; for example a reference to a central clearinghouse or WADA approved lists of recognised programs or lists of recognised ADOs or lists of educators or lists of eLearning programs;

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

We feel stakeholders should mutually recognize Education Programs (just like the mutual recognition of TUEs). Stakeholders should only be able to decline the recognition of an Education Program if:

1. the program does not comply with the general conditions of accountability as stated in the ISE, or if;
2. the stakeholder gives clear substantiated arguments for its decision.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

We accept and welcome the intent of this article whereby educational activities can be “recognised” to minimise duplication. However, we believe this current wording is unworkable and suggest again that WADA should take the lead of recognising ADO education programmes.

WADA should implement a quality assurance process, as part of the audit schedule to assess and recognise ADO education programmes. This should also feed into the compliance process. WADA should then publish those ADO programmes that are both compliant, and of appropriate quality, enabling all ADOs to consider such recognition when setting education policies or developing new programmes.

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

CCES agrees with the spirit of the comment made by the Advisory Group on Education (T-DO ED) regarding article 8.2. This needs to be clarified as to processes and/or authority; e.g. which education program or organization is authoritative?

9.0 Accountability**9.1 (1)****Council of Europe**

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

If the comment for section 6.0 is approved the reference in 9.1.a) b. should be changed to monitoring (replacing evaluation);

The word “impact” should be deleted from in 9.1.a) b. and the concept of impact assessment be described in the Education Guidelines;

9.2 (3)**Council of Europe**

SUBMITTED

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

As section 9.2 and 9.3 is repeating text from elsewhere in ISE, it could be revised, renamed to a new section “Conclusion” or deleted altogether unless it is a standard approach for all WADA IS.

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

We suggest to remove this article, as it only repeats earlier stated information

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

We would makes the same comments on the minimum inclusion in the Education Pool.

9.3 (1)**Doping Authority Netherlands**

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

SUBMITTED

We suggest to remove this article, as it only repeats earlier stated information