

Showing: All (345 Comments)

Article 1 (12)

**Brazilian Olympic Committee**

SUBMITTED

André Rodrigues, Technical Scientific Coordinator (Brazil)  
Sport - National Olympic Committee

General Comments

Anti-Doping Organizations are contributors to clean sport.  
Signatories are contributors to clean sport.  
Signatories' members (including National Federations and their members) are contributors to clean sports.  
All these responsibilities should be shared with all sports community.  
As more shoulders we have, lighter is the load for each participant.

Suggested changes to the wording of the Article

Anti-Doping Organizations, signatories and signatories' members are contributors to clean sport and are obliged to ensure Education forms a core component of their anti-doping programs so that such programs are balanced and focused on Prevention.

**Council of Europe**

SUBMITTED

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

General Comments

Art. 1-3: Introduction and Overview  
  
Promotion and Reputation: suggestion to emphasize the role of Anti-Doping Support Personnel (ASPs) in promoting fair play, earning public trust, and building a clean reputation.

**Swiss Sport Integrity**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

SSI supports the benefits of clean sport education and understand why it is athlete centered. However, as the ASP play a crucial part, it should be emphasized in the introduction and scope and added in the benefits.

**ONAU**

SUBMITTED

JOSE VELOSO, Antidoping Medical Director (Uruguay)  
NADO - NADO

General Comments

No Comments

Japan Anti-Doping Agency

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

SUBMITTED

General Comments

1.0

■Illustrating the benefits of education is a very good way to promote understanding of its importance among athletes and stakeholders.

■In order to ensure consistency with international standards, is it not necessary to illustrate the benefits of other international standards as well? By sharing the importance of this with athletes and stakeholders in other areas besides education, we can expect to see the promotion of anti-doping programmes.

Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

SUBMITTED

General Comments

General comments (on the whole standard)

Overall, the working group deserves recognition for their efforts in updating the ISE. The expansion and clarification of several points are especially commendable. Since its implementation in 2021, the ISE has generally had a very positive impact on the entire anti-doping education sector. Our comments mainly focus on specific details and the need for additional explanation in certain areas.

As the authoring group is already aware, there is a need for templates to guide processes. For example, it is important to have education plan templates available promptly when the ISE comes into force (with reference to 9.4: *Documenting the Education Plan*). This will help ensure standardization and reduce uncertainties. This applies to several articles, including 10.1: *Sharing the Education Plan*, 11.0: *Evaluating the Education Program*, and 11.3: *Evaluating the Education Program*.

We also request that the drafting group consider moving some of the proposed changes to the guidelines, and/or revising certain mandatory 'shall' requirements to the more flexible 'should'. We anticipate that the changes, as they stand, will create a significant administrative burden, reducing the time available for education delivery. This will particularly impact smaller ADOs, making it difficult for them to comply with the ISE.

Sport Ireland

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

SUBMITTED

General Comments

Very clear intro

Suggested changes to the wording of the Article

N/A

National Anti-Doping Agency (NADA Austria)

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)

NADO - NADO

SUBMITTED

General Comments

We want to recognize and thank the drafting group for all their hard work on the ISE. We support and are encouraged by the overall direction the ISE is heading.

One of the main general comments the group identified is that the new draft is certainly more demanding than the current version of the ISE. We would ask that the drafting group highly considers moving several of the changes to guidelines and/or changing many of the “shall” to “should”.

The overwhelming comments from many ADOs we have talked to (CoE, CEADO, PEERS, etc.) is that these changes will create an immense amount of administrative burden reducing the amount of time for education delivery. Some smaller ADO’s have even shared the anxiety and stress

of just seeing the changes has impacted them, and there is a great fear they will not be able to follow, comply, and/or be successful with all the changes.

Suggested changes to the wording of the Article

Athlete Support Personnel’s Anti-Doping Rights Act  
Inclusion of Athlete Support Personnel  
Positive Language

Reasons for suggested changes

Athlete Support Personnel’s Anti-Doping Rights Act

Out of the 11 Anti-Doping Rule Violations, 7 also apply to ASP. ASP have roles and responsibilities in the WADC and IS and so they should also have rights. One could also argue that ASP want to work in a professional environment and have a right to participate in doping-free sport not only because they are affected by ADRVs, but also because they suffer from doping directly (e.g. because one of their athletes used doping and they did not know) or indirectly (e.g. because their athletes were not as successful as they competed against athletes who used doping).

A first step to acknowledge the importance of the role and influence of ASP would be an ASP Anti-Doping Rights Act like the Athletes’ Anti-Doping Rights Act.

This idea is already reflected in the current draft of the key purpose of Anti-Doping which was developed during the GLDF4CleanSport-project: “Promote clean sport by working collaboratively to develop and deliver a world programme which protects the right of all athletes and their support personnel to participate in a doping-free environment.”

In light of this, we welcome the new sentences “Athletes have a right to Education as identified in the Athlete’s Anti-Doping Rights Act. Athletes and Athlete Support Personnel also have a right to Education as per the UN Sustainability Goal 4 – Quality Education.” However, if, - according to this - ASP have the right to be educated –there should also be an “Athlete Support Personnel’s Anti-Doping Rights Act”.

Inclusion of Athlete Support Personnel

The sentence “The benefits of Education and compliance with the Code and International Standard for Education are significant for Athletes, organizations, and the integrity of sport.” should be amended to include ASP: “The benefits of Education and compliance with the Code and International Standard for Education are significant for Athletes, ASP, organizations, and the integrity of sport.”

The sentence “Education contributes to a level playing field by preventing doping practices. It helps to maintain the integrity of sport Competitions by instilling and reinforcing the value of fair play in Athletes.” should be amended to include ASP: “Education contributes to a level playing field by preventing doping practices. It helps to maintain the integrity of sport Competitions by instilling and reinforcing the value of fair play in Athletes and ASP.”

The sentence “When Athletes and organizations follow anti-doping regulations, fans and sponsors have confidence in the authenticity of results.” should be amended to include ASP: “When Athletes, ASP and organizations follow anti-doping regulations, fans and sponsors have confidence in the authenticity of results.”

Positive Language

The ISE in general maintains a rather positive language (no fight against the scourge of doping as in other standard). However, the last sentence is rather negative: “Building a clean reputation. Educated and compliant Athletes, Athlete Support Personnel and organizations maintain their reputations and their integrity. Doping scandals tarnish reputations and can have long-lasting negative consequences.” We suggest using a more positive language or simply delete the last sentence.

USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

General Comments

1. USADA wants to recognize and thank the drafting group for all their hard work on the ISE. We support and are encouraged by the overall direction the ISE is heading.
2. One of the main general comments heard internationally is that the new draft is certainly more demanding than the current version of the ISE. We would ask that the drafting group highly considers moving several of the changes to guidelines and/or changing many of the new “shall” comments to “should” comments.
3. The overwhelming comments from many are that these changes will create an immense amount of administrative burden reducing the amount of time for education delivery. Some smaller ADOs have expressed anxiety and stress regarding their ability to implement these changes.
4. The sentence “The benefits of Education and compliance with the Code and International Standard for Education are significant for Athletes, organizations, and the integrity of sport.” should be amended to include ASP: *“The benefits of Education and compliance with the Code and International Standard for Education are significant for Athletes, ASP, organizations, and the integrity of sport.”*
5. The sentence “Education contributes to a level playing field by preventing doping practices. It helps to maintain the integrity of sport Competitions by instilling and reinforcing the value of fair play in Athletes.” should be amended to include ASP: *“Education contributes to a level playing field by preventing doping practices. It helps to maintain the integrity of sport Competitions by instilling and reinforcing the value of fair play in Athletes and ASP.”*
6. The sentence “When Athletes and organizations follow anti-doping regulations, fans and sponsors have confidence in the authenticity of results.” should be amended to include ASP: *“When Athletes, ASP and organizations follow anti-doping regulations, fans and sponsors have confidence in the authenticity of results.”*

General Comments

De manière générale, par rapport à l'ensemble du processus de mise à jour du Code et des Standards, nous saluons cette première version du Code et des Standards révisés.

En particulier, nous saluons le fait qu'il s'agisse davantage d'une mise à jour plutôt que d'une révision profonde (le Code et les Standards étant arrivés à un bon niveau de maturité et aussi pour des raisons de sécurité juridique).

En revanche, nous regrettons le fait qu'aucune évaluation d'impact n'ait été réalisée, que ce soit par rapport aux règles et législations applicables ou par rapport aux ressources humaines et financières des signataires.

Aussi et comme l'AMA s'y était engagée au début du processus, nous lui redemandons à nouveau que cette évaluation d'impact soit réalisée et ce, le plus rapidement possible, afin que les différentes propositions de modifications (du Code et des Standards) puissent être examinées et évaluées de manière complète et sous tous leurs aspects.

Pour ce qui concerne le Standard éducation, une évaluation d'impact globale sur l'ensemble des propositions serait la bienvenue.

Toujours concernant ce dernier Standard, il est à noter qu'il est encore relativement récent. En ce sens, une évaluation générale de son application serait également très utile.

General Comments

The structure of the ISE is different than for other IS (including whether the definitions specific to this IS is placed in the end (like in the Code) or in art. 3. (like in all other IS). We recommend consistency in the structures across IS.

General Comments

*Athlete Support Personnel’s (ASP) Anti-Doping Rights Act*

Out of the 11 Anti-Doping Rule Violations, 7 also apply to ASP. ASP have roles and responsibilities in the WADC and IS and so they should also have rights.

One could also argue that ASP want to work in a professional environment and have a right to participate in doping-free sport not only because they are affected by ADRVs, but also because they suffer from doping directly (e.g. because one of their athletes used doping and they did not know) or indirectly (e.g. because their athletes were not as successful as they competed against athletes who used doping).

A first step to acknowledge the importance of the role and influence of ASP would be an ASP Anti-Doping Rights Act like the Athletes' Anti-Doping Rights Act.

This idea is already reflected in the current draft of the key purpose of Anti-Doping which was developed during the GLDF4CleanSport-project: *“Promote clean sport by working collaboratively to develop and deliver a world programme which protects the right of all athletes and their support personnel to participate in a doping-free environment.”*

*Educators*

The IST Annex G establishes requirements on Sample Collection Personnel. Something similar should be considered for educators adapted to their role and responsibilities.

Article 2 (8)

Brazilian Olympic Committee

André Rodrigues, Technical Scientific Coordinator (Brazil)  
Sport - National Olympic Committee

SUBMITTED

General Comments

The signatories' members should be part of an educational plan. They have a close contact with athletes and cannot stay apart of this matter.

Suggested changes to the wording of the Article

2.2 Key Principles

- ...
- Knowledge-focused Education Programs are not sufficient. The outcome of an Education Program is the development of Clean Sport Behaviors and the reinforcement of values.
- Signatories' members, including National Federations shall support, provide, and offer education to their athletes and athletes support personnel.

Bhutan NADO

Nima Gyeltshen, Director (Bhutan)  
NADO - NADO

SUBMITTED

General Comments

Who have grantee that athlete start clean? *Athletes start in sport clean, and the first priority should be to keep them that way.*

Suggested changes to the wording of the Article

*First priority should be to educate athletes in staying clean and living healthy.*

Reasons for suggested changes

To make it simple and straight. Actually, point one and two can be merged as one so as to make document compact and user freindly.

ONAU

JOSE VELOSO, Antidoping Medical Director (Uruguay)  
NADO - NADO

SUBMITTED

General Comments

No Comments

Japan Anti-Doping Agency

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

SUBMITTED

General Comments

- 2.2**
- We welcome the fact that the key principles clearly states that one education session does not constitute an 'educated Athlete'. Athletes should be educated throughout their sporting careers.
  - The current description is impactful and easy to understand, but we propose the following as a style for key principles;
    - Athletes should be educated throughout their sporting careers. One education session does not constitute an 'educated Athlete'.
    - The outcome of an Education Program is the development of Clean Sport Behaviors and the reinforcement of values. This is why a knowledge-focused educational programme is not sufficient.

General Comments

In Articles 2.2, 4.0, 6.2, 13.1.2, 13.2.2, 13.3.2. the term “influential” is used to refer to athlete support personnel. The CCES would request WADA provides guidance to clearly define how an ADO should determine which athlete support personnel are “most influential.”

General Comments

SIA acknowledge the critical importance of protections being in place at an early stage in the process, to ensure the protection of every minor participating in sport. As such, we suggest that WADA consider strengthening the education of minors to ensure they must be educated prior to testing.

This would go above and beyond ISE article 6.1.2 Requirements of Signatories, where a minor shall be included on an Education pool if they compete at International Events where testing takes place.

Suggested changes to the wording of the Article

No suggested changes.

Reasons for suggested changes

To ensure that minors are aware of the testing process and understand what is required of them during the witnessing of the sample. Additionally, minors and their parents are able to make more fully informed decisions regarding complying with anti-doping control and if not, the potential consequences.

General Comments

Signatories are encouraged to adopt the following principles that underpin the International Standard for Education, to inform their own Education Programs.

Suggested changes to the wording of the Article

Replace "are encouraged to" with "should".

Reasons for suggested changes

These ISE principles are important and should be adopted by all ADOs.

General Comments

Good inclusion of the Key Principles (2.2), particular the written emphasis places on programmes being balanced and should 'support and prevent' vs 'catch and punish'; as well as the positive framing being adopted.

It is noted that with respect to education activities, that the focus is on tailoring them to meet the learners' needs and delivered using a variety of formats. It is hoped that this is maintained despite the emphasis placed on 'e-learning'.

Article 3 (2)

ONAU

JOSE VELOSO, Antidoping Medical Director (Uruguay)

NADO - NADO

SUBMITTED

General Comments

No Comments

Sport Ireland

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

SUBMITTED

General Comments

N/A

Article 4 (12)

Brazilian Olympic Committee

André Rodrigues, Technical Scientific Coordinator (Brazil)

Sport - National Olympic Committee

SUBMITTED

General Comments

The sinatories' members should be included.

Suggested changes to the wording of the Article

" ...  
  
Signatories shall take into consideration cultural and sport contexts, the needs of the learners, the resources available and the cooperation and support of their members when developing the Education Program."

Council of Europe

Council of Europe, Sport Convention Division (France)

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

SUBMITTED

General Comments

1. Implementation and Clarity:

- A flexible implementation timeline considering the varying capacities of signatories is recommended to support strategic planning and funding.

- Concerns about the phrase "to address" in the third paragraph, which caused confusion regarding whether in-person education delivery is mandatory.

- Clearer guidance on the timing and nature of education delivery is needed.

2. Educational Focus and Definitions:

- The introduction of new concepts, such as "Clean Sport Behaviors," should be placed at the beginning of ISE for clarity.

- While the framework for education programmes is necessary, the implementation could be challenging; flexibility in interpretation for signatories is welcome;

- The integration of values, behaviors, and evidence-informed, theory-based education into program language is welcome. However, terms like "evidence-informed" and "theory-based" require clearer definitions or examples, potentially supported by a WADA-provided library of approved materials.

- The need to define "Sport System"

- consistent reference to the spirit of sport as outlined in the Code.

3. Vulnerable Groups:

- The sub-article on supporting those most vulnerable to doping should be clarified and potentially split into more focused sections to avoid confusion.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

From a terminology point of view the Plan (=strategy) seems bigger than the program, followed by the activity. This logic has now been adapted to Program - Plan - Activity.

FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

General Comments

At a general level, the requirements of the revised International Standard for Education increase significantly. It remains questionable whether it is reasonable or even possible for all signatories to realistically implement the entirety at this scale. A clear framework is necessary, but it should not be so burdensome that documentation takes precedence at the expense of practical education. There must be enough flexibility and leeway in the interpretation of implementation, considering the constraints of one's own operations and operating environment. For example, defining the needs of the sports system, athletes, and athlete support personnel is not a simple task. Additionally, the requirement to translate an increasing number of documents into English adds extra costs for non-English speaking countries.

It's great that support is being shown to those in the most vulnerable positions (the highest risk for doping use) and/or those who have the best opportunities to strengthen clean sport. How are these groups practically defined and assessed by each signatory?

It is essential to reassess which of these new requirements should reasonably be included in the standard, can be practically implemented equally by all signatories, and which should instead be moved to recommendations and guidelines.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

General Comments

4.0

We request that the concept of a 'learner-centred approach' be explained in the ISE or guidelines so that there is a common understanding among the signatories.

4.0 - Evidence-informed and theory-based Education development and practice;

Depending on the capacity of the ADOs, there may be cases where opportunities and means for data collection are limited. In order to promote evidence-informed and theory-based education, we request that the WADA share ADEL survey data with ADOs and that ADOs be able to customize some of the questionnaires.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

General Comments

**4.0. Second Section:** “... Signatories shall take into consideration cultural and sport contexts, the needs of the learners and the resources available when developing the *Education Program*...”



Signatories shall develop, document and deliver the Education Program to address the following:

- In person delivery by Educators.
- A curriculum that incorporates values, Clean Sport Behaviors and Mandatory Core topics.
- ...

FEEDBACK 4.0

We agree that it is ideal for cultural and sports contexts to be considered in this process. However, we are curious about how International Federations (IFs) can effectively incorporate cultural contexts, and more importantly, how they can document this consideration. The same applies to 'in-person delivery by Educators'.

Additionally, we believe that it is essential to include a statement that any education program must take into account the resources available to the program or organization.

Therefore, we recommend changing 'shall' to 'should' for this article. We also suggest reordering the bullet points to improve the overall coherence of the text.

Lastly, there is a need for a clear definition of what is meant by 'clean sport behavior'.

Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

General Comments

Clear Overview

USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

General Comments

From the PEERS group:

Evidence based theories

We recommend there be a definition added for Evidence based theories and examples be added to the guidelines.

Vulnerable

There should be some clarification what “vulnerable” means, either here or in the definitions.

USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

General Comments

1. The sentence “Signatories shall develop, document and deliver the Education Program to address the following” should be changed to include a “should” to read: “*Signatories shall develop, document and deliver the Education Program that considers the following*”.
2. “Shall” take into consideration cultural context, we recommend changing “shall” to “should”
3. Define and clarify “vulnerable” and “most influential”

Change “in person delivery by educators” to “mode of education”

Reasons for suggested changes

1. “Address” implies mandatory action whereas “consider” implies thoughtful evaluation and may/ may not require action.
2. While we support NADOs evaluating culture considerations, this is incredibly difficult for IFs given the many cultures represented in their organizations.
3. This is very subjective

Other types of education are not outlined, the consideration should be what kind of education.

#### Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

SUBMITTED

##### General Comments

In-person delivery by Educators;

The delivery of education sessions in-person could take place either in the same room or online.

##### Suggested changes to the wording of the Article

We suggest adding a definition of “in-person delivery” to clarify that “in-person” means physically or online. This would also simplify the text.

##### Reasons for suggested changes

Clarification and increased readability.

#### Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

SUBMITTED

##### General Comments

Article 4.0 makes note that "Signatories shall take into consideration cultural and sport contexts, the needs of the learners and the resources available when developing the Education Program." However, there is concern that this International Standard in general does not fully consider the lack of human resources in some NADOs/IFs with the levels of documentation etc which will be required.

#### International Testing Agency

International Testing Agency, - (Switzerland)

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

SUBMITTED

##### General Comments

Regarding this part: "Signatories shall take into consideration cultural and sport contexts, the needs of the learners, and the resources available when developing the Education Program." We agree with this principle but we believe it may be challenging IFs can effectively take "cultural contexts" into account and we wonder how they would document this. The same concern applies to NADOs, as it may not be straightforward for them to tailor content to the specific context of each sport.

This high-level principle might be more appropriately addressed in secondary documents, such as guidelines, providing also practical examples.

### Article 5 (11)

#### World Rugby

David Ho, Senior Manager Anti-Doping Operations (Ireland)

Sport - IF – Summer Olympic

SUBMITTED

##### General Comments

World Rugby considers the changes to Article 5 are a positive development to the standard

Council of Europe

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

SUBMITTED

General Comments

Cooperation Among Federations1. Targeted Language and Structure:

- Rewording of Article 5.1 is recommended to better account for differences among signatories and to clarify its applicability across various organizations (IFs, NADOs, MEOs).
- National Federations need to cooperate not only with International Federations but also with National Anti-Doping Agencies in implementing educational programs.
- Cooperation between the ADO’s education and testing departments is essential, particularly if the goal is to introduce athletes to the anti-doping system through education rather than doping control.

2. Educational Pathways and Inclusion:

- focus on diverse athlete pathways is welcome, but concerns about resource limitations, particularly for smaller nations.
- The inclusion of pharmacists and dietitians under medical professionals was suggested.
- "Talented athletes" should be explicitly added to Article 6.1.3 to ensure they are included in educational efforts.

FINCIS

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

SUBMITTED

General Comments

There is a need for a simple and concise model for assessing and documenting the sports system, one that can be reasonably implemented by each signatory. Describing the sports system and its structures should be manageable with a reasonable effort. The same applies to the typical or general athlete pathway. It is difficult to envision how creating such a model is even possible, as each sport has its own specific characteristics.

Japan Anti-Doping Agency

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

SUBMITTED

General Comments

5.0

- It is important that the signatories consider educational programmes based on the assessment of the sports system. In order to carry out the assessment effectively, it is preferable that guidelines include procedures and worksheets, etc.
- The criteria and definitions of ‘vulnerable’ may differ between countries and cultures. The guidelines need to include an explanation of the concept of vulnerability (e.g. the difference between vulnerability and risk) and examples of items.

NADA India

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

General Comments

Consider ensuring that guidance on creating and implementing a curriculum is easily accessible to smaller or resource-constrained Signatories.

Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

SUBMITTED

General Comments

**5.0 Sport System Assessment, *First Section:*** *In addition, Signatories shall identify those most vulnerable and at risk of doping.*

*FEEDBACK 5.0*

This is ideal and good in principle. However, 'those most vulnerable and at risk' is a very broad definition that lacks explanation, guidelines, or references to specific groups.

Sport Ireland

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

SUBMITTED

General Comments

Clear outline of the sport system assessment

National Anti-Doping Commission of Barbados

Adrian Lorde, Chairman (Barbados)

NADO - NADO

SUBMITTED

General Comments

This is onerous. A template is needed to assist in implementation of this requirement

USADA

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

SUBMITTED

General Comments

1. Recognizing that it remains important to prioritize the focus on specific sports, however, we have chosen to replace language like “top 20” and “high risk sports” and “high risk countries” to “risk assessment”
2. It seems that 5.1. is more focused on the national level (although the wording sometimes tries to include IFs as well). We suggest separating this article to have clearer language on what is expected from which type of signatory.

Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

SUBMITTED

General Comments

While it is agreed that some baseline measure is helpful, there are concerns about the feasibility of / ease with which such a Sport System Assessment can be conducted by lesser resourced organizations.

International Testing Agency

International Testing Agency, - (Switzerland)

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

SUBMITTED

General Comments

We support the principle, but we believe that more practical guidance (via supporting materials, templates, Guidelines) will be needed to assist ADOs in effectively conducting a systematic sport system assessment and the determination of "those most vulnerable and at risk of doping." Without such guidance, there's a risk that this process could lack depth and impact, and essentially become a procedural exercise.

Article 5.1 (6)

**UEFA**  
Thomas Rossier, Anti-doping Coordinator (Switzerland)  
Sport - Other

SUBMITTED

General Comments

It is a good change to specify Education plan and Education Program.

Yes, it is good that the curriculum is in line with the athelte pathway but when drafting the pathway, it must be taken into consideration tha tthe athelte pathway is very different from sport to sport and also from team and individual sport. However some guidelines yes would be great but not in the ISE.

**Swiss Sport Integrity**  
Ernst König, CEO (Switzerland)  
NADO - NADO

SUBMITTED

General Comments

As the Sport System Asessment is part of the Education progam, the content will be published. However, SSI is strongly against publishing of risk countries or risk sports, that shall be included. This will not benefit anybody whatsoever but just create a lot of questions regarding how and why the sport or country has ended up on the high risk list.

**Anti Doping Danmark**  
Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

General Comments

**5.1 Conducting a Sport System Assessment:** *Signatories* shall describe the sporting environment within which they operate. This shall include the following information at a minimum: "

- ... Top 20 high-priority sports or countries
- ... High-risks sports or countries for doping
- ... Professional associations or bodies, including but not limited to those for: sports coaches, medical professionals, pharmacists, dieticians".

FEEDBACK 5.1

Risk assessments are complex and require expert knowledge to interpret correctly. Information about high-risk sports or countries could easily be misinterpreted or overanalyzed, leading to misunderstandings. It is crucial for organizations to operate effectively without having to disclose all of their sensitive strategies and insights. From our perspective, there are valid reasons for keeping risk assessments internal, as this not only protects the organization's position and the important work they are doing, but also helps prevent potential misinterpretations.

For these reasons, the phrases 'Top 20 high-priority sports or countries' and 'high-risk sports or countries for doping' should be removed from the article.

As for 'professional associations or bodies,' it may be challenging for International Federations (IFs) to provide this information. It might be more appropriate to address this issue at the national or NADO level.

**RUSADA**  
Viktoriya Barinova, Deputy director (Russia)  
NADO - NADO

SUBMITTED

General Comments

We suggest adding he criteria for defining High-risk sports or countries or give the example in Comments

#### Reasons for suggested changes

The easiest way is to take the data resulting the process of Risk assessment for Testing, but if there are any other criteria it would be useful to have the example.

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

Clarity might be required on the level of detail needed in the Sports System assessment so as not to overburden under-resourced organizations and federations. The provision of a template would be helpful here.

#### University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

#### General Comments

The need for further clarification on the difference between the terms “Education Program” and “Education Plan” was evident in the interviews we conducted with ADO staff. Staff often demonstrated misunderstandings about the difference between the two and what information should be included in each document. Of the six organizations, only one made a clear and consistent distinction between the two. This was also evident in our analysis of ADO's education plans, which varied greatly in the information contained and how it was presented.

The templates now being provided for the education program and education plan are welcome updates and may help less resourced ADOs. In both interviews and document analyses, we observed marked differences in content and level of detail between organizations of different sizes and scales. Providing templates may assist ADOs that lack the capacity to develop bespoke documents. It may also help clarify what should be included in each document, even for organizations that do not ultimately use the templates for their final documents. The definitions for education plan and education program are also helpful.

#### Suggested changes to the wording of the Article

Possible further additions that could benefit ADOs include an explanation of what a curriculum is, what it should do, and how it might typically look in Appendix I.

#### Reasons for suggested changes

It is evident from our interviews that ADO education staff are not always from an education background and might therefore benefit from these additions.

### Article 5.2 (3)

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

#### General Comments

Article 8.4 already covers the documenting of the education program. It does not seem necessary to repeat the “Documenting” part in each section.

#### Suggested changes to the wording of the Article

Delete 5.2 altogether, as well as articles 6.4 and 7.4 and other articles that are covered by 8.4.:

- Vision, aims and program objectives as per Article 8.0;
- The Sport System Assessment as per Article 5;
- The Athlete Pathway as per Article 5.1;
- The Education Pool as per Article 6;
- The process for how Educators are recruited, trained, assessed, accredited and reaccredited as per Article 7;

- The resources needed to deliver as per Article 7.2.

#### Reasons for suggested changes

To improve readability and streamline the ISE.

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

Clarity might be required on the level of detail needed in the Sports System assessment so as not to overburden under-resourced organizations and federations. The provision of a template would be helpful here.

#### SEARADO

SUBMITTED

Gobinathan Nair, Director-General (Singapore)  
Other - Other (ex. Media, University, etc.)

#### General Comments

Presently, there are Regional Multi event competitions (eg South East Asian Games) where close to 800 samples are collected. However, they are a non signatory and was not able to use the ADAMS. This has resulted in other issues such as RM not heard on time, positive cases in SEA Games heading to the Asian Games (though the MEO here is a signatory, they are not purview to the positive cases as it is not in ADAMS).

#### Suggested changes to the wording of the Article

Add additional statements to 5.3.1

1. Multi sports event organizers at a regional level where the athlete participation is big (Panam Sports for the Pan American Games or **regional multi-sports Games of an equivalent magnitude**) shall have the authority to conduct Testing

#### Reasons for suggested changes

Reasons as follows:

1. Participation number is greater than the PanAm Games... yet for one game it is official and signatory but the SEA Games is not).
2. As mentioned, how can an athlete test positive head for another major games..... these are cracks that need to be addressed

### Article 6 (13)

#### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

#### General Comments

World Rugby have some concerns with the mandatory addition of the parents of minors to the pool. Though we fully appreciate the potential benefits of educating this group, the lack of direct relationship (certainly from a formal andragogical point of view) between IFs and parents and even NFs and parents could make this very difficult in practice, certainly to monitor compliance. This seems to present a level of complexity/degree of separation too far, particularly when we are still struggling to find effective collective means of tracking education records for athletes.

#### Council of Europe

SUBMITTED

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

## General Comments

Challenges in ImplementationCoordination and Resource Allocation:

- Emphasis should be placed on the importance of collaboration between the ADO's Testing and Education teams, particularly in educating athletes before testing;
- Concerns about the practicality of implementing broad educational programs for minors and parents, especially in resource-limited settings.
- Signatories with limited financial or human resources may face difficulties in implementing the standard, which could have compliance implications.
- The concept of an Education Pool may be challenging for some organizations to implement fully without additional budget and staff support.

## NADA

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

SUBMITTED

## General Comments

'In the articles 6.0 and 6.1 seem to have conflicting norms regarding athletes in the Education Pool.

6.0 "Consequently, both Athletes and Athlete Support Personnel SHALL form part of the Education Pool"

6.1 "Signatories SHOULD consider all Athletes (...) for inclusion in their Education Pool"

Furthermore the combination of 6.1.1 and 6.1.2 might create confusion:

6.1.1 "At a minimum (...) NADOs shall includes National-Level Athletes (...)"

6.1.2 "all Signatories shall include (...) Athletes included in the Testing Pool (...) [and] Registered Testing Pool"

It would draw a clearer and more distinctive picture if the ISE would solely focus on the type of Testing Pool instead of mixing up International-Level Athletes/National-Level Athletes on the one hand and Testing Pool and Registered Testing Pool on the other hand.

Proposal:

### 6.1.1 Requirements for Specific Signatories

At a minimum the following groups of Signatories shall include specific categories of Athletes in their Education Pool:

- International Federations shall include Athletes in the Registered Testing Pool in their Education Pool;
- National Anti-Doping Organizations shall include Athletes in the Testing Pool and Registered Testing Pool in their Education Pool;
- Major Event Organizations shall include participants of their Events in their Education Pool.

### 6.1.2 Requirements for all Signatories

In addition, all Signatories shall include the following Athletes in their Education Pool:

- Minors competing at International Events where Testing takes place;
- Athletes returning from a period of Ineligibility.

## UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

SUBMITTED



General Comments

UKAD is overall supportive of this proposed change of expanding the Education Pool. We currently include Minors competing at international events as part of the major event pre-games education policy and have a process for checking the education status of athletes prior to being added to testing pools, with tools and mechanisms to complete education prior to being added if required.

Also, overall supportive of the philosophy of Playground to Podium.

Suggested changes to the wording of the Article

6.0 - 'A core principle of the International Standard for Education is that Athletes ~~are educated~~ **have access to education** from 'Playground to Podium'.

Reasons for suggested changes

Current wording infers they must be or will be educated, but the numbers associated with individuals at each stage of the athlete pathway, especially lower down the pathway (schools and junior sports clubs), are beyond our resource capability and potentially of other signatories.

Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)  
NADO - NADO

General Comments

Anti-Doping Sweden supports the suggestion to broaden the mandatory education pool.

After discussions with other NADOs there seems to be confusion or different interpretations to which extent the Signatory should make education mandatory for the mandatory target groups in the Education Pool. The questions are: Is the mandatory requirement considered fulfilled when the Signatory provides the different education activities such as E-learning, webinars, face-to-face lessons etc which are tailored and available for each mandatory target group? Or does the Signatory also have to examine and record that every individual in these target groups has completed the education activity? For example, the latter could be easily done for the RTP athletes, but it would be very difficult for ADOs to identify every individual in the target group “Minors competing at international events where testing takes place and their parents”.

ADSE suggests a text with clarification on this to be included in the ISE. There is a sentence in the document “Summary of major changes” that clarifies this to a certain extent, but it is not written in the ISE draft. The text is:

*“It should be noted that the mandatory inclusion in an Education Pool does not mean that every single person in these groups will be required to receive in-person education in a given year. Rather, such groups of individuals shall be actively identified and included in a Signatory’s Education Plan with specific targeted education activities to ensure that they are educated regularly and have access to the relevant information and are fully aware of their responsibilities under the Code.”*

ADSE suggests this text to be included in Article 6 with a change of wording of the term “in-person education” to the term “a certain education activity” since education could include other activities than in addition to in-person education.

The text that ADSE suggests being included in Article 6 is:

*“It should be noted that the mandatory inclusion in an Education Pool does not mean that every single person in these groups will be required to receive a certain education activity in a given year. Rather, such groups of individuals shall be actively identified and included in a Signatory’s Education Plan with specific targeted education activities to ensure that they are educated regularly and have access to the relevant information and are fully aware of their responsibilities under the Code.”*

NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

General Comments

Provide more guidance on how to engage minors and parents/guardians in anti-doping education, as they may require tailored approaches.

Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

#### General Comments

The expansion of the mandatory Education Pool to include a broader group of athletes as well as ASP is a positive addition. This change ensures that athletes who may be more vulnerable to unintentional or deliberate doping are reached earlier, preventing doping incidents through education rather than through punitive measures.

#### Malaysia Anti Doping Agency (ADAMAS)

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)  
NADO - NADO

#### General Comments

Specific elements suggested to be included:

- 1.1) Level of education, pool for age or participation of athletes in sports in general; and
- 2) Athletes support personnel (ASP) to be amended i.e. on agent and parents education with certain level only.

#### Suggested changes to the wording of the Article

1. Suggested for WADA:
  - 1) Need to clarify the age of athletes (playground to podium) to differentiate the modules; and
  - 2) Challenging to accommodate parents/ agents.

#### USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

#### General Comments

1. In general, we would like to see “target groups” remaining and feel it is important to not have to ‘prioritize all groups’ in the Education Pool but still have groups that are ‘target’ and have an education pathway, but not top priority of an Education Pool.

#### Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)  
NADO - NADO

#### General Comments

- We are wary of the proposal for International Federations to be primarily responsible for International Level Athletes. We believe education tailored to the athlete/participant (based on sport, or geography, or both) is more beneficial than generic education.
  - Most IF based education is eLearning focused, due to the challenges of reaching people around the world in multiple languages.
  - Very few IFs have custom eLearning courses specific to their sports. By contrast, many NADOs have customised eLearning courses.
  - Therefore most IFs are likely to refer athletes to ADEL (the generic WADA e-Learning courses) unless there is a recognition process in place with a NADO (but many IFs do not have the capacity to establish their own recognition processes)
  - If an international athlete commits an ADRV, that has a huge implication for the NADO – it is often the NADO who comes under criticism, especially if their education is inadequate. By contrast, the IF rarely comes under criticism, unless it is a top 5 international athlete.
- We are concerned that if the ISE is promoting a position that the IFs have responsibility for International Level athletes, this could likely lead to less recognition agreements, and more uptake of ADEL over custom NADO resources – which could potentially be a worse outcome for athletes.

***“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”***

Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

SUBMITTED

General Comments

Some athletes fall in the three categories, which could create duplication of education and increase the risks of “education fatigue”. For example, for the Olympic Games, many international-level athletes will be educated by NADOs, while also being part of both IFs and MEO education pools.

Suggested changes to the wording of the Article

Delete 6.1.1

Reasons for suggested changes

To simplify the planning of clean sport education, we suggest adjusting the responsibilities outlined in “Part Three: Roles & responsibilities of signatories and others”. Please see General Comments in Article 13.0.

Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

SUBMITTED

General Comments

While the inclusion of Athlete Support Personnel in writing in the IS is welcomed, there are concerns about full incorporation of this group into an Education Pool. Some ASP might not reside in country or operate under the auspices of an NF or NOCs which might make assessing them different.

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

Education Pool

We strongly support the notion that every athlete’s first interaction with the anti-doping system should be through education and not testing. Therefore we support the expansion of the Education Pool to move beyond just the RTP and athletes returning from a sanction, to include:

- all athletes for whom a Signatory is directly responsible (international-level athletes for IFs, national-level athletes for NADOs, event participants for MEOs)
- athletes in a Testing Pool
- minor athletes competing in international events

We also know that athletes most often do not dope alone, so we support the expansion of the Education Pool to include Athlete Support Personal (ASPs), especially head coaches and medical staff.

While we understand the importance of educating all of these groups, we are concerned about the capacity of Anti-Doping Organizations to provide quality education to this drastically increased number of learners. And with the overlapping responsibilities of IFs, NADOs, and MEOs to educate athletes, we are concerned that athletes will face a greater likelihood of duplicative education. This must be avoided, not only to respect athletes’ time, but to ensure that their experience with anti-doping education is positive.

Article 6.1 (17)

Tug of War International Federation

Peter Dyer, Senior Vice President (England)  
Sport - IF – IOC-Recognized

SUBMITTED

General Comments

There should be a note here that Athletes should not be in two or more education pools. For instance, in my sport, MEOs are for International events only, and therefore the Education pools for them would include athletes already in the IF education pool.

The inclusion of minors at international events being included in the education pool, needs to be carefully considered such that they are not subjected to greater stress of undertaking Education courses while preparing for, what is most likely, their first international event.

## UEFA

SUBMITTED

Thomas Rossier, Anti-doping Coordinator (Switzerland)  
Sport - Other

### General Comments

Mandatory education of all minors could be a challenge for certain country especially to exactly track who has been educated. If we think about face to face education which is how it needs to be especially for minor.

For sure as you stated in the last paragraph it does not need to be face to face but then they won't really be "educated".

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

### General Comments

Minors competing at International Events where Testing takes place is the most challenging situation for all involved organizations. A NADO cannot know where an IF is planning to test beforehand. A NADO often will not know who will participate, even the NF often doesn't yet know who will be selected (i.e. Athletics). The only organisation who can guarantee education before testing, is the IF with requirements before competing at their events.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

### General Comments

6.1.2. Further clarity required regarding Minors competing at International Events (where testing takes place). Potential for duplication of resource as it states that '*all Signatories* shall include the following athletes in their Education Pool: Minors competing at International Events where testing takes place'.

Based on the ISE definition of an *International Event*, we see this as an area of concern, as aside from what we currently cover under our Major Games Clean Games Policy, e.g. Youth Commonwealth Games, Youth Summer and Winter Olympic Games, etc. This definition infers Minors *at all* International Events outside of Olympic, Paralympic, IF World/ European/level events, at various age groups e.g. U16, U17, U18 etc, and would equate to a significant number of events and in turn athletes that would need to be educated prior to competing. We are therefore concerned about resource implications of directly supporting this portion of the athlete pool.

Suggestion to provide greater clarity in 6.1.2 about working collaboratively with the respective IF/NFs to deliver education to Minors at the events listed in the definition.

### Reasons for suggested changes

This will provide greater clarity around the interpretation of the definition in the context of the signatory.

## FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

### General Comments

Reaching the group of 'Minors competing at International Events where Testing takes place' is very difficult for the NADO's.

How the specific categories of athletes are defined? For example, who will be included into National-Level athletes.

## Suggested changes to the wording of the Article

We propose that all international-level athletes participating in international competitions, including minors, should fall solely under the responsibility and education pool of the IF's.

### Reasons for suggested changes

Currently there is no way for NADO's of obtaining information about international competitions in which different sports participate, as there are a vast number of them. Additionally, there is no information available on whether there are minors in the team or whether the event involves testing.

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

### General Comments

#### 6.1.2 - Minors competing at International Events where Testing takes place;

From the perspective of protecting minor athletes, we agree with including minors competing at international events in the education pool.

On the other hand, if the education is not shared by the IF before the international events, or is shared just before the events, it may be difficult to provide education to these minors.

Because International Events are identified by IFs, IFs should be mandated to publish, and communicate to NFs, which Internatioanl Events require pre-event education.

#### 6.1.2 - Athletes returning from a period of Ineligibility

If an Athlete serving a period of Ineligibility retires and then returns to the sport as a ASP, is he/she included in the education pool?

#### 6.1.2 - Athletes returning from a period of Ineligibility.

In some cases, it is better to provide education immediately after the ineligibility period begins, rather than just before the athlete returns from the ineligibility period (for example, in cases where the athlete has ADRV because they misunderstood the rules).

It would be beneficial for ADOs to share best practice in terms of the timing of educational interventions during the ineligibility period in the future.

#### 6.1.3 - Masters Athletes

The definition of 'Masters Athletes' needs to be more clearly stated.

## Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

### General Comments

**6.1.1 Requirements for Specific Signatories;** *At a minimum the following groups of Signatories shall include specific categories of Athletes in their Education Pool:*

- *International Federations shall include International-Level Athletes in their Education Pool;*
- *National Anti-Doping Organizations shall include National-Level Athletes in their Education Pool;*

#### FEEDBACK 6.1.1

The underlying principle is fundamentally sound and ideal. However, the current wording may give the impression that the responsibility for education activities for International-Level Athletes and Athlete Support Personnel (as referenced in Article 10.4) rests solely with the International Federations (IFs).

We believe that National Anti-Doping Organizations (NADOs) should play a role in educating international-level athletes in cooperation with the relevant International Federation. Many IFs may opt for the simpler route, such as relying on ADEL, which could result in international athletes missing out on important national-specific information like medical search tools, Speak Up processes, and more.

If the responsibility is placed entirely on the IFs, it could undermine efforts from National Anti-Doping Organizations (NADOs) to provide comprehensive education and lead to unnecessary duplication of education, potentially to the disadvantage of the athletes.

**6.1.2 Requirements for all Signatories;** In addition, all *Signatories* shall include the following *Athletes* in their *Education Pool*: *Minors competing at International Events where Testing takes place;*

#### FEEDBACK 6.1.2

The principle behind this requirement is sound and ideal, but its practical implementation poses challenges, especially regarding responsibilities.

First, International Federations (IFs) would be responsible for identifying and publishing which events may involve testing. Then, National Federations (NFs), in collaboration with their National Anti-Doping Organization (NADO), would need to ensure that athletes selected for events involving minors are properly educated. However, this is challenging to execute since many athletes at this level are often chosen at the last minute and may not typically be part of the education pool. Additionally, since NFs are not signatories to the Code, there is uncertainty and confusion around their specific roles and responsibilities in this process.

**Canadian Centre for Ethics in Sport**

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

**General Comments**

**Article 6.1.2:** Consider moving “Minors competing at International events where testing takes place” to Article 6.1.1 as a specific requirement for Ifs, as they have full knowledge of all international events where testing is taking place. Alternatively, this group could be downgraded from “shall” to “should.”

**Dopingautoriteit**

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

**General Comments**

The article leads to confusion, as it first states Signatories should consider all athletes (6.1) Then, it states which groups must be included (6.1.1 and 6.1.2). Lastly, it states which group should also be considered (6.1.3).

Also, how do we prevent the groups mentioned in 6.1.2. will be over-educated by multiple Signatories as they all need to include them in their respective Education Pools?

We also question who’s responsible for minors competing at International Events where testing takes place. We believe it should be the IF’s / MEO’s responsibility.

**Malaysia Anti Doping Agency (ADAMAS)**

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)  
NADO - NADO

**General Comments**

**6.1.3:**

1. Suggested for WADA to define “*Masters Athletes*” such as level of ages, senior athletes or elite athletes.

**Suggested changes to the wording of the Article**

- 1.

**RUSADA**

SUBMITTED

Viktoriya Barinova, Deputy director (Russia)  
NADO - NADO

**General Comments**

1. We suggest to include in the Standard and the Code the definition of Master athletes from art. 6.1.3. Currently there is no definition.
2. To add new category to 6.1.2

6.1.2 - *Athletes* entering a period of *Ineligibility*

## Reasons for suggested changes

Inclusion of *Athletes* entering a period of *Ineligibility* into Educational pool would help to address detailed information on conditions of ineligibility, athletes rights and obligations during this period

## USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)

NADO - NADO

## General Comments

## From the PEERS group

## 6.1.2 Minors competing at International Events where Testing takes place

The requirement “Minors competing at International Events where Testing takes place.” is very difficult to fulfil for some ADOs. E.g. NADOs cannot know if and where Testing takes place at an International Event. On the other hand, IF sometimes can also not know where testing takes place (e.g. in the event they delegated this to a service provider or the NADO requests to test at an International Event in a shorter notice).

It is also difficult for some ADOs to know which minors are competing there without support from the National or International Federation.

With the current information policies of international federations, it is impossible to know or find out which events are international events. Some federations publish the relevant information on their website, many don't.

We fully support the idea of putting the focus on minors. However, this needs some rethinking. If this approach is upheld, WADA must provide a database where every ADO can easily check the current regulations for ILA (important for TUEs, Testing, Education, RM, etc.).

## Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

## General Comments

*International Federations* being required to include all *International Level Athletes* in their *Education* Pool without additional commentary on the role of recognising *NADO Education*, and the prevention of duplication, is likely to create undue burden on *International Level Athletes* receiving duplicate education requirements. The current process of recognition can be difficult and time-consuming for signatories, which may lead to an approach that minimises burden on signatories (i.e. ease of compliance reporting) but creates education duplication.

For many sports, those competing at international level are required to compete in national level competitions at various times during the 12-month cycle to qualify for *International-Level Events*, and the often years-long pathway at national level to get to the elite level of sport (during which times they have *NADO/NF Education* requirements).

Additionally, *NADOs* and *NFs* have significant investment in ensuring their *Athletes* are fully educated ahead of competing internationally including reputational risk to the nation. Therefore, SIA would prefer to have assurances they are the owners of the *Education* compliance for their *International Level Athletes*, with a valuable geographical/cultural lens applied to the content.

From a *NADO* perspective, it would be preferable for the *IFs* to prioritise *Education* compliance to *International-Level Athletes* from countries/regions where *NADOs* are unable to ensure compliance and/or offer geographically/culturally customised education. Wording should encourage *IFs* to recognise education delivered by *NADOs* to *Athletes* competing internationally. WADA should consider adding wording to the effect that “In considering recognition, *Anti-Doping Organisations* should prioritise/recognise cultural or sport specific eLearning courses.”

**6.1.1** – The expanded *NADO* requirements to include all *National-Level Athletes* in the *Education* Pool will be relatively straight forward for well-resourced education teams, however there is potentially concerns around how a smaller *NADO/RADO* would be able to meet this requirement.

## Suggested changes to the wording of the Article

6.1.1 Requirements for Specific *Signatories*

At a minimum the following groups of *Signatories* shall include specific categories of *Athletes* in their *Education* Pool:

- International Federations shall include *International-Level Athletes* in their *Education* Pool, with IF's prioritising their *Education* efforts to athletes from countries/regions where *NADOs/RADOs* are unable to ensure adequate *Education*. *NADO Education* recognition is encouraged for those from countries/regions that are able to ensure adequate *Education*;
- *National Anti-Doping Organizations* shall include *National-Level Athletes* in their *Education* Pool;
- *Major Event Organizations* shall include participants of their *Events* in their *Education* Pool.

#### Reasons for suggested changes

To reduce duplication of *Education* for *Athletes*, who are often elevated from National-level to International-level, therefore, existing in *Education* Pools overseen by two different organisations. Whilst it is appreciated that IFs play an important role assessing the education compliance of their athletes, wording to reduce duplication would be welcomed by NADOs who feel the IFs are best placed to do so in the global anti-doping system.

#### USADA

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

SUBMITTED

#### General Comments

1. 6.1.1: There should be some language here about duplication of efforts. In general (here and in Article 13) we strongly recommend clarifying the roles considering the following:
  - The main education efforts are carried out by NADOs up until the athletes compete in international events / become international level athletes (ILA).
  - Duplication is mainly happening for ILA
  - IFs should be responsible on ILA, if they were not already educated sufficiently by NADOs.
  - Country specific information is also relevant for ILA
  - If IFs educate athletes that have already been educated sufficiently by NADOs, IFs should focus on the (additional) requirements of their events.
  - MEOs have a responsibility to require the IFs for event-specific education. However, MEOs don't need to educate themselves if the system is working (= athletes are educated already by NADOs and IFs). Therefore, we suggest deleting the requirement for MEOs to have an education pool.

#### Suggested changes to the wording of the Article

Change "shall" to "should"

#### Anti-Doping Sweden

Christine Helle, CEO (Sweden)  
NADO - NADO

SUBMITTED

#### General Comments

ADSE suggests simplifying the structure of the text in Article 6.1-6.3. We suggest that all target groups that are mandatory be included in one heading, regardless of whether they are athletes or ASP, and all target groups that are considerable/optional under another heading.

ADSE also suggests a change in the wording in Article 6.1.2 as described below.

#### Suggested changes to the wording of the Article

Article 6.1.2 Requirements for all Signatories

In addition, all Signatories shall include the following Athletes in their Education Pool:

- Minors **who could be eligible for participation in** ~~competing at~~ International Events ~~where Testing takes place~~;
- Athletes included in a Testing Pool;
- Athletes included in Registered Testing Pool;
- Athletes returning from a period of Ineligibility.

#### Reasons for suggested changes



Article 6.1.2: In ADSE’s opinion it will be very difficult for Signatories to identify the group “*Minors competing at International Events where Testing takes place*” as an ADO not always know beforehand if testing will take place in an event. ADSE therefore suggests a change of wording to “*Minors who could be eligible for participation in International Events*”. An International Event is defined in the Code and there is implied that doping tests could occur at these events, thereby the term “where Testing takes place” is unnecessary.

**University of Birmingham**

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

**General Comments**

The inclusion of additional groups in the education pools of signatories is welcome, including those that signatories are primarily responsible for. This will ensure consistency. Our analysis of current education plans suggests many signatories include most of the mandatory groups, but it is good to have this included in the ISE for consistency across the board.

**International Testing Agency**

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

**General Comments**

6.1

While we agree with the principle, this statement may lack clarity, as IFs and NADOs have broad jurisdiction, with all athletes in a given sport subject to the IF ADR, and all athletes in certain countries subject to the NADO ADR. Conducting an assessment of all athletes under their jurisdiction to determine the appropriate education pool could prove impractical. This general statement appears somewhat redundant and could be removed to prevent potential confusion, given that more detailed guidance is provided in the following provisions.

6.1.2

Regarding the additional requirements for all Signatories, particularly the part mandating the inclusion of "Minors competing at International Events where Testing takes place," we appreciate the principles behind this, but find the requirement impractical. It is often challenging, if not impossible, for IFs and NADOs to predict, when establishing the pool and with sufficient lead time for educational activities, which minors will be competing in events with testing. This could impose an unenforceable burden on ADOs, potentially leading to legal challenges and claims if they are unable to demonstrate effective implementation of this requirement.

**Article 6.2 (17)**

**World Triathlon (ITU)**

SUBMITTED

Jeanne Courbe, Anti Doping Manager (Spain)  
Sport - IF – Summer Olympic

**General Comments**

For an International Federation, educating the parents of minors Athletes competing in international events where testing is taking place might be very challenging due to different factors: identifying the parents is not always easy, as this is the National Federation who is the main speaker for them. Languages could be an issue as well, ressources of the IF to educate the parents.

As an example, per year World Triathlon has around 250/300 minors Athletes competing at international events where testing is taking place.

This requirement should fall under the NADO and the National Federations: they would be able to deliver education to the parents of Athletes still minors, in their own language and with the specificities of the country

**Suggested changes to the wording of the Article**

6.2.1 Requirements for all Signatories

(...)

In addition, Signatories shall include, or where not possible, shall seek cooperation with the relevant Anti-Doping Organisation to include the following Athlete Support Personnel in the Education Pool:

(...)

**Reasons for suggested changes**

As explained in the general comments

## UEFA

SUBMITTED

Thomas Rossier, Anti-doping Coordinator (Switzerland)  
Sport - Other

### General Comments

ASP should be precisely defined.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

### General Comments

Consideration to include a footnote to 6.2.1 to clarify the various roles under the broad term 'medical personnel', e.g. Doctors, Physiotherapists, Strength & Conditioning Coaches, Rehabilitation Therapists, Massage Therapists, Psychologists, etc.

### Reasons for suggested changes

This will provide greater clarity of interpretation and ensure that key roles will not be missed out.

## FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

### General Comments

It is important to refer back to the comments on the previous article.

### Suggested changes to the wording of the Article

The responsibility for education of athlete support personnel should be defined for IF's or MEO's. (Parents/Guardians of Minors competing at International Events where Testing takes place)

### Reasons for suggested changes

For the same reasons, the athlete support personnel of minors participating in international competitions should fall solely under the responsibility and education pool of the IF's or MEOs. NADOs do not have access to this group.

The biggest practical challenge is likely to be including the guardians or parents of minor athletes competing at international competitions in the education pool, as they are not directly subject to the code and regulations.

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

### General Comments

#### 6.2.1 Requirements for all Signatories

At a minimum this **shall include coaches and medical personnel** of the groups of Athletes listed in 6.1.1 and 6.1.2.

The 'coaches' 'medical personnel' are very large and unidentifiable groups. For example, the 'coaches' include everything from national coaches to private coaches for individual athletes. In the case of 'medical personnel', there is a wide range from doctors who accompany national teams to athletes' personal doctors. It is not realistic to provide education to athletes' personal doctors.

#### 6.2.1 - Parents/Guardians of Minors competing at International Events where Testing takes place;

From the perspective of protecting minor athletes, we understand the importance of including 'the guardians of underage athletes who participate in international competitions where testing is carried out' in the education pool.

However, the Education Pool must reflect the resources available to the Signatory and reaching parents/guardians may be beyond our grasp to the point that effective education to the Pool is impossible.

It should be moved to '6.2.2 other athlete support personnel'

#### 6.2.1 - The most influential Athlete Support Personnel should be given priority.

Guidelines should include examples of procedures and tools for how to select the 'most influential ASP'.

### HADA (HELLENIC ANTIDOPING AGENCY)

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)

NADO - NADO

#### General Comments

There is a reference in the 6.1.3 for the University athletes.

There should be a proportional way of thinking for the ASP and there is a solid reasoning behind this. There is no higher education degree for becoming an athlete, whereas there are plenty for supporting the athletes or in layman's terms for becoming ASP. There should be a way for NADOs to educate people who study to become future coaches, trainers, physiotherapists, orthopedics, pathologists -and all other doctors who may be associated with athletes-, dieticians, sports lawyers and sports journalists in the context of their academic studies. All these categories are either directly or indirectly associated with athletes and their uninformed choices/conduct could potentially lead to an ADRV or the perplexion of a result management.

We believe that an initiative should take place regarding the incorporation of an anti-doping course in the curriculum of the universities where the upcoming ASP study. If not for a mandatory course, at least for a non-mandatory. That course could not necessarily be implemented by the NADOs' educators. However, the NADO should provide the education material or its expertise regarding the significant parts of the anti-doping information which each category of the ASP should be aware of.

### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

#### General Comments

**6.2.1 Requirements for all *Signatories*;** At a minimum this shall include coaches and medical personnel of the groups of *Athletes* listed in 6.1.1 and 6.1.2.

In addition, *Signatories* shall include the following *Athlete Support Personnel* in the *Education Pool*:

Parents/Guardians of *Minors* competing at *International Events* where *Testing* takes place; ....

#### FEEDBACK 6.2.1

The principle is ideal, but these groups, particularly Parents/Guardians, are difficult to reach. We suggest changing the wording from "shall include" to "should consider" to provide more flexibility. For example, Parents/Guardians of Minors competing at International Events where Testing takes place are not directly bound by the rules. Perhaps the wording could be revised to state that they should be included and encouraged to understand the rules that their child is subject to, rather than implying a direct obligation.

### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

#### General Comments

6.2 states Signatories should consider Athlete Support Personnel, who are subject to their anti-doping rules for inclusion in their Education Pool. However, the parents / guardians mentioned in 6.2.1. are often not bound by the doping rules. This is partially also true for medical personnel.

How should a Signatory decide/know who the most influential athlete support personnel is? We believe there can be great differences regarding different sports, age groups, and development/performance level. More guidance is needed.

We suggest to add 'requirements per specific signatory' to 6.2

### Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

#### General Comments

6.2.1 Any Athlete Support Personnel accredited by a Major Event Organization....

Something to note which has come up in conversation this year is the difficulty of getting ASP of athletes who are training abroad to complete the training requirements when the relationship with that ASP may not be there. Is it worth noting "Any Athlete Support Personnel accredited by a Major Event Organization must complete the training requirements set out of the country their athlete is representing"

In addition to the comment above, Article 10.3 regarding recognition of prior learning may help with the comment above, however, the concerns and questions raised in Article 10.3 still stand.

#### Suggested changes to the wording of the Article

See above

#### Reasons for suggested changes

See above

### USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

#### General Comments

From the PEERS group:

#### 6.2.1 Parents/Guardians

The requirement "Parents/Guardians of Minors competing at International Events where Testing takes place" is very difficult to fulfil for some ADOs (see comment on 6.1.2).

ADOs don't have contact information from parents and we believe even many federations don't have this information.

We fully support the idea of putting the focus on Parents/Guardians of minors. However, this needs some rethinking. If this approach is upheld, there would need to be a database where every ADO can easily check the current regulations for ILA (important for TUEs, Testing, Education, RM, etc.).

This would also need a requirement for national federations to provide the contact information of Parents/Guardians to ADOs.

### National Anti-Doping Commission of Barbados

SUBMITTED

Adrian Lorde, Chairman (Barbados)  
NADO - NADO

#### General Comments

The use of shall is questioned. Recommended is suggested.

#### Reasons for suggested changes

Too onerous a requirement for a small NADO.

### Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)  
NADO - NADO

#### General Comments

ADSE suggests simplifying the structure of the text in Article 6.1-6.3. We suggest that all target groups that are mandatory be included in one heading, regardless of whether they are athletes or ASP, and all target groups that are considerable/optional under another heading.

**Malaysia Anti Doping Agency (ADAMAS)**

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)  
NADO - NADO

**General Comments**

1. Athlete Support Personnel (ASP) signatories requirements:  
Parents or Guardians of Minors International Events - Suggested for WADA to define International Events organized by International Federation only or listed sports under Sports Commissioner.

**Agence française de lutte contre le dopage**

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

**General Comments**

6.2.1

The definition of “Medical personnel” is broad and could be interpreted differently by Signatories.

**Suggested changes to the wording of the Article**

At a minimum this shall include coaches and the most relevant medical personnel (i.e. team doctors, physiotherapists, etc.) of the groups of Athletes listed in 6.1.1 and 6.1.2.

**Reasons for suggested changes**

To ensure the most relevant education pool.

**Caribbean Regional Anti-Doping Organization**

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

**General Comments**

With the expansion of the recommended Education Pool participants, there are concerns over whether organizations would be 'penalized' if parents and other ASP are not accessible as they might fall outside of the organization's jurisdiction.

Article 6.2.2 the keeping of the wording "within their means" is welcomed.

**University of Birmingham**

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

**General Comments**

The requirement to include ASP specifically in education pools is welcome. However, some interviewees from ADOs discussed the range of categories for ASP and their differing requirements. As such, the specification that coaches and medical personnel in particular should be included is welcome.

**Suggested changes to the wording of the Article**

Given this is a new addition, it might be worth directing signatories to guidance on what to include in education for minors and their parents, and whether they should receive education together or separately. ADO staff did recognize the potential importance of parents, so this is a welcome addition.

Although the 2027 ISE requires signatories to specify what education particular groups will receive, providing some direction for groups that have become mandatory to include between ISE 2021 and ISE 2027 could be helpful to many signatories. Further clarification on whether all parents of athletes competing in international events must receive education, and if so, how this will be documented and ensured by signatories, may be helpful.

It could be worth stating in 9.3 that the education plan should tailor their education activities to the specific needs of coaches versus medical professionals when providing education for ASP. It might be useful to specify who “the most influential” ASP are in 13.3.2.

Attempts could also be made to avoid a reactive approach whereby ASP receive education at the last minute to be compliant with the ISE, rather than receiving it earlier in their involvement with an athlete to increase the likelihood of ASP instilling clean sport behaviors in the athletes they support.

Reasons for suggested changes

The one group we have seen included less frequently is parents, so the requirement to include parents of minors in the education pool may affect different signatories differently, with some being better prepared than others to include this group.

The requirements of coaches and medical personnel are likely to differ considerably, so direction on what education each group should receive may be helpful.

We have heard of reactionary approaches during interviews, whereby education is delivered to be compliant with the ISE rather than as a logical part of the education program/plan to achieve the stated learning outcomes.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

6.2.1

We support the principles outlined in this provision, but the current language is unclear, and certain revisions may be necessary:

- The provision references the groups in sections 6.1.1 and 6.1.2 but does not clarify which organization is responsible for each group listed. It should be made explicit that the respective ADO mentioned in 6.1.1 and 6.1.2 is responsible for the education of the relevant ASP
- This clarification is particularly important for the second part of the provision, where it is unclear who is accountable for each group mentioned (e.g., the ADO that imposed the ineligibility on the ASP or the Major Event Organizer for the ASP accredited at the event).
- With respect to Parents/Guardians of Minors competing at International Events, as noted in our comment on section 6.1.2, this requirement is difficult to enforce. IFs often lack advance visibility on which minors will compete, and reaching Parents/Guardians is even more challenging. Additionally, IFs/MEOs may not be best suited to handle this (e.g., due to language barriers).
- A thorough reassessment of the use of "shall" (as opposed for instance of "should consider") in this provision is advised, as it may result in unintended legal ramifications.

Article 6.3 (5)

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

General Comments

The list includes 'Commercial sponsors'; this is a broad definition and we recommend that this be more specific and relevant to clean sport, or to include “appropriate” commercial sponsors.

Reasons for suggested changes

This will reduce any ambiguity should a Signatory wish to include commercial sponsors in their Education Pool.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

The scope of having all athletes educated and part of the Education Pool is a good ambition, but very far from being realistic. For example, for a well-developed NADO like SSI, it will never be possible to follow up with 2 Mio. people who would be in the Education Pool in Switzerland - the budget and resources for this will never be available. This is addressed in 6.4.

### Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)  
NADO - NADO

#### General Comments

ADSE suggests simplifying the structure of the text in Article 6.1-6.3. We suggest that all target groups that are mandatory be included in one heading, regardless of whether they are athletes or ASP, and all target groups that are considerable/optional under another heading.

### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

#### General Comments

The definition of Athlete Support Personnel can already be found in the Definitions section of both the ISE and the Code. For conciseness, articles 6.2.2 and 6.3 could be merged and the list of ASPs deleted.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

The recommendation for the "Other" group in the Education Pool section is helpful for further guidance. However, based on capacity limitations, these extensions could be onerous if they ever become mandatory of under-resourced organizations.

## Article 6.4 (2)

### Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

#### General Comments

The addition of "...based on the resources and capacity to deliver" is important to acknowledge the difference in team sizes and resources of the various Signatories.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

Article 6.4 the acknowledgement of the potentially varying levels of resources and capacity is welcomed.

## Article 7 (18)

### Tug of War International Federation

SUBMITTED

Peter Dyer, Senior Vice President (England)  
Sport - IF – IOC-Recognized

#### General Comments

This comment applies to all articles in this section. The inclusion of all these requirements takes no consideration of the type of sport and resources available.

While professional sports may well have both the human and financial resources to support this, I would suggest that most minority amateur sports do not. Again, this is WADAs approach of 'one sizes fits all', rather than being targeted and proportionate. There has to be , as a minimum, a differentiation between professional and amateur sport and the resources they have available.

**World Triathlon (ITU)**

SUBMITTED

Jeanne Courbe, Anti Doping Manager (Spain)  
Sport - IF – Summer Olympic

**General Comments**

no mention of the number required by a Signatory.

Are Educators required only in the case of in-person education ? In the event the main education delivered by a Signatory is online through E-Learning, would the requirement be the same regarding the Educators?

**World Rugby**

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

**General Comments**

World Rugby would consider this to be a positive change, though we wonder whether it will place some challenges on less well-resourced ADOs or those where the educators are volunteers. Notwithstanding this, in order to ensure education remains effective after the initial training is completed, we would suggest that the wording on oversight (ie. reaccreditation) could be made even tighter/stricter.

It may also be of use (perhaps in the ISE Guidelines) to include wording to encourage ADOs to recruit educators from their National Federation staff/volunteer group where possible to better utilise resources (as less travel would be needed for educators if they are embedded with teams/athlete groups) and to avail of potential benefits resulting from the existing relationships these individuals would have with the group they are educating, and their knowledge of the sport.

**Council of Europe**

SUBMITTED

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

**General Comments**

Educator Accreditation and Responsibilities1. Accreditation and Training:

- The comprehensive requirements for educators could pose challenges, particularly for smaller signatories.
  - Clearer guidelines on accreditation, including the timing and frequency of assessments, were requested.
  - Educators should ideally have a background in sport, such as former athletes or physical education teachers.
  - Criminal background checks are considered appropriate given the work with young people.
  - The training process should clarify the division of responsibilities between International Federations and Anti-Doping Agencies, considering socio-cultural differences, which might require national anti-doping agencies to handle these processes.
2. Reaccreditation and Interpretation:
- Reaccreditation should be based on assessments, and there should be flexibility in interpretation to accommodate different national contexts.
  - While the framework is good, there is room for interpretation, which should be clarified to avoid inconsistencies.

**UK Anti-Doping**

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

**General Comments**



UKAD is very supportive of the future direction and emphasis placed on the role of the Educator in clean sport.

**Japan Anti-Doping Agency**

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

**General Comments**

7.0  
We welcome the clear indication of the direction in which athletes will also be involved in the delivery of education.

**NADA India**

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

**General Comments**

Consider adding specific competency frameworks or templates that Signatories can use to standardize educator training and assessment processes.

**FINCIS**

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

**General Comments**

Do all signatories have sufficient resources to meet the increasing demands for educators?

**Sport Ireland**

SUBMITTED

Cóleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

**General Comments**

See comment under 7.3

**Dopingautoriteit**

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

**General Comments**

We support the education of educators by Signatories. However, we suggest to make it clear that a qualified educator from one Signatory is not automatically a qualified educator for another Signatory, as education should be tailored to specific groups and should consider cultural aspects. Therefore, Signatories should be encouraged to align expectations regarding recognition of educators

**National Anti-Doping Agency (NADA Austria)**

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

**General Comments**

We feel that some parts of this section are too explicit and read more like a job description and is not reflective of different structures. That said, an annex for this (as compared to the Annex for DCOs in the IST) may be an option, but this annex should be a “should” not a “shall”.

The head office should plan and develop content, and educators should be responsible for delivery. This could be pointed out more clearly.  
Note: This statement is also supported by the PEERS group which consists of Education Experts from (among others) the NADOs of Australia, Austria, Denmark, Germany, New Zealand, Switzerland and USA.

**USADA**

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

**General Comments**

From the PEERS group:  
7.0 Educators

We feel that some parts of this section are too explicit and read more like a job description and is not reflective of different structures. That said, an annex for this (as compared to the Annex for DCOs in the IST) may be an option, but this annex should be a “should” not a “shall”.

The group agreed that the head office should plan and develop content, and educators should be responsible for delivery. This could be pointed out more clearly.

**Sport Integrity Australia**

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

**General Comments**

Whilst we are supportive of the Article 7 as it is written to strengthen the *Education* programs of signatories, there is potentially a concern around how smaller NADOs will be able to meet the more extensive accreditation requirements, whilst they are also required to educate more cohorts of *Athletes*, *Persons* and other *Persons* (Article 6.1).

**Suggested changes to the wording of the Article**

No suggested changes.

**National Anti-Doping Commission of Barbados**

SUBMITTED

Adrian Lorde, Chairman (Barbados)  
NADO - NADO

**General Comments**

Signatories shall assign educators but it must be recognized limitations of human resources.

**Reasons for suggested changes**

Should not be mandatory

**Caribbean Regional Anti-Doping Organization**

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

**General Comments**

The acknowledgement of the formal role of educators in writing in the IS is good. However, there are also concerns that the level of formality assigned in some areas might alienate volunteers.

**Chair**

SUBMITTED

Athlete Council, WADA (Canada)  
Other

General Comments

Educators

Qualified educators are of course central to providing athletes with quality education. In order for Signatories— in particular those with fewer resources— to be able to comply with the standards for recruitment, training and assessment, and accreditation of educators set out in Article 7, it is critical that the “Comment to 7.1” be realized:

“WADA has published a Professional Standard for Educators as part of its Global Learning and Development Framework. Will be done on or before January 2027.”

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

General Comments

The 2027 ISE states that signatories should train and assess educators, and that educators should be trained using a blended learning approach (online, in-person delivery, peer learning, simulated delivery) with an assessment process included. However, it stops short of explaining where such training or accreditation should come from.

Another relevant issue here is how active current educators are.

Suggested changes to the wording of the Article

It may be worth providing more direction on where such training or accreditation should come from.

Although challenging, in an ideal world it might be useful to provide centralized resources to support the training and accreditation of educators to improve parity across organizations/countries.

If possible, it could be helpful to disseminate elements from existing educator training programs to help less-resourced organizations develop their own programmes.

Reasons for suggested changes

A key finding when reviewing the education plans and interviewing ADO staff is the significant disparity in resources between different organizations/regions. For smaller organizations with few staff fulfilling multiple roles on very tight budgets, not specifying this might lead to large disparities in how this is addressed. As a result, national standards for education may vary significantly across countries.

One organization identified the need to conduct a root-and-branch review to help understand how many educators are currently active, and another estimated that only around 50% of the educators they have trained are currently delivering education.

ADO staff during interviews questioned who trains the trainers who are training the educators, how they are assessed, and whether it might be useful to have one organization responsible for this globally. Although organizations of differing sizes and scales had given thought to improving and standardizing the training of educators, larger organizations had more resources to act on their visions for this. Some larger organizations we interviewed have well-established training programs for educators.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

General Comments

7.0

We recommend replacing "in-person" education with "face-to-face" throughout the document to clarify that "in-person" education can include both physical (in-person) and/or virtual delivery methods, as referenced in Article 11.11 and the previous paragraph of Article

Article 7.1 (5)

UEFA

SUBMITTED

Thomas Rossier, Anti-doping Coordinator (Switzerland)  
Sport - Other

#### General Comments

It is important to really define well what are the core competencies of an educator, not only the knowledge they need to have but also their soft skills , presentation skills. Article 7.1 and 7.2 are good.

#### HADA (HELLENIC ANTIDOPING AGENCY)

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

#### General Comments

[Comment to Article 7.1: WADA has published a Professional Standard for Educators as part of its Global Learning and Development Framework. Will be done on or before January 2027.]

1. Additionally to the professional standard which is in the works, there should be a specific complementary guideline which will define precisely the content of the program and how it should be implemented. If this is already scheduled to be integrated in the professional standard then ignore this comment.

However, we would like to point out the importance of the exact framing of the educators' education program. In the education pool's education programs there is a lot of room for adjustments according to the target group and its needs. This gives educators around the world the liberty to form a variety of programs for the same target group. That cannot be the case for the educators. The educators program should have a specific structure and conspicuous guidelines from start to finish, as they will need to perform at the highest of standards and they will be held both responsible and accountable for their reach and effectiveness.

2. If an ADEL e-course was designed for the educators it would unequivocally avail the whole educators training and evaluation/accreditation process.

#### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

#### General Comments

Is the mentioned Professional Standard for Educators the same as the Education Professional Standard, developed within the GLDF program? Or this this a new Professional Standard?

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

#### General Comments

Some people, including athletes, have a great profile to be Clean Sport Educators, without having education experience.

#### Suggested changes to the wording of the Article

Delete "Education": Signatories should have a process in place to recruit Educators with relevant experience.

#### Reasons for suggested changes

Cf. General Comments

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

The notion of relevant Education experience might be subjective.

## Article 7.2 (8)

### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

#### General Comments

7.2 - For the sentence; "Signatories should identify appropriate personnel (i.e. Educator Trainers) to train and assess Educators". UKAD feels greater clarity is needed on the role of the Educator Trainer and whether this will be outlined in the Professional Standard. Reference to "appropriate personnel" is too vague and Educator Trainer criteria is recommended to ensure the quality and consistency of Educator Training across signatories.

If this isn't considered to be within the scope of the Professional Standards for Educators, whether consideration can be given to having a section on Education Trainers or to be included within the Guidelines as this would be welcomed.

### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### General Comments

While appreciating the more detailed requirements for Educators, the comprehensive requirements for educators could pose challenges, particularly for smaller signatories. In the view of SSI, Educators should ideally have a background in sport to connect with the target group.

### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

#### General Comments

We feel the need for more information regarding the mentioned competencies and we wonder whether this information will be provided by the Professional Standard for Educators

### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

#### General Comments

**7.2 Training and Assessment of Educators;** *Signatories* shall train and assess Educators. Educators should be trained using a blended learning approach (online, in-person delivery, peer learning, simulated delivery) and shall include an assessment process.

Educators shall be competent in the following areas:

- *Education* session planning and activity development;
- Use assessment to evaluate learning

#### FEEDBACK 7.2

Educators shall not necessarily be required to both develop activities and assess learning outcomes, as this may be too rigid, especially when a program is already in place. We believe that educators should, at a minimum, be responsible for and competent in delivering the activities, but it should not be mandatory for them to develop or evaluate the activities. These tasks can be handled by the organization.

### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 7.2:** The wording “simulated delivery” is unusual. Consider replacing with “mock” or “practice” session.

**Article 7.2:** Consider removing the phrase “activity development” from “*Education* session planning and activity development.” It is noted that an Educator, as defined in Article 7.0 as one who “leads the delivery of formal in-person *Education* (physical or virtual) and may be supported by other *Persons*,” does not necessarily need to be competent in activity development. Defining learning objectives, designing the learning experience, assessment and evaluation design, etc., is a different skills set than delivering the activity. Additionally, as *Education Activity* is a defined term, the use of activity here could cause confusion if used inconsistently.

## Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

### General Comments

SIA acknowledges that sport plays a pivotal role in highlighting and setting standards regarding social issues. Therefore, we acknowledge that the code and relevant international standards could be strengthened to support and reflect social standards.

As part of article 7.2: Training and Assessment of Educators we suggest that WADA assess whether Signatories consider whether their Educators could undertake training related to basic human rights i.e. gender diversity, child safeguarding training and potentially others that could include anti-racism or anti-harassment and discrimination training.

### Suggested changes to the wording of the Article

Educators shall be competent in the following areas:

- Presentation and interpersonal skills;
- Effective communication skills;
- Education session planning and activity development;
- Create and maintain a positive learning environment;
- Facilitate learning through scenario-based activities;
- Use assessment to evaluate learning;
- Self-reflection skills and action planning;
- Anti-doping technical knowledge - all topics outlined in Code Article 18.2.

Signatories may consider Educators have relevant knowledge of the following:

- Transgender and gender diversity;
- Child safeguarding;
- Anti-racism;
- Anti-harassment and discrimination knowledge

### Reasons for suggested changes

This will assist in ensuring that Educators are proficient at creating a safe and inclusive environment for all athletes regardless of their background ensuring non-bias and ruling out discrimination. This will additionally support a person-centred approach as addressed in feedback on Annex L: Modifications for Transgender and Gender Diverse Athletes.

## USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

### General Comments

- 7.2: Practically speaking, the head office plans and develops content, and educators should be responsible for delivery. This should be pointed out more clearly.

7.2: We recommend the removal and addition of the educator competencies to the guidelines as best practice recommendations (instead of a “shall”)

**International Testing Agency**

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

**General Comments**

7.2

Regarding the section: "Educators shall be competent in the following areas:

- Education session planning and activity development;"

Educators should not necessarily be required to develop activities themselves. This requirement may be too rigid, especially when a program is already in place. We believe that, at a minimum, educators should be capable of delivering the activities, but it should not be mandatory for them to also develop them.

**Article 7.3 (5)**

**Japan Anti-Doping Agency**

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

**General Comments**

**7.3 - the professional development needs**

It is unclear what 'professional development needs' specifically refers to, so examples should be given.

Is this in line with the 'Professional Standard for Educators' that will be released in the future?

**Sport Ireland**

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

**General Comments**

The importance of Educators who are accredited is invaluable. Furthermore, having a global standard is equally as invaluable to ensure consistency and fairness across the globe. A standardized global educator accreditation program would ensure an international recognition of educator qualifications for example all lead educators to complete the ITA's ICSE programme would ensure all lead educators have received a high standard of education who then can pass that knowledge on and help to establish an accreditation pathway for the other educators within their Signatory.

**National Anti-Doping Commission of Barbados**

SUBMITTED

Adrian Lorde, Chairman (Barbados)  
NADO - NADO

**General Comments**

A template is needed for this requirement.

**Reasons for suggested changes**

In order to standardized this requirement.

**Malaysia Anti Doping Agency (ADAMAS)**

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)  
NADO - NADO

General Comments

Suggested for WADA to provide a specific period of time to accredit and reaccredit the educators. (To produce qualified educators with a higher competency and latest updates)

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

A formal accreditation and reaccreditation process will have an impact on less resourced organizations as such processes come at a cost. One would not want a situation where competent educators should be deemed not valid as a result of a lack of formal reaccreditation etc, or that programmes are deemed invalid because educators where not formally accredited.

Article 7.4 (2)

Brazilian Olympic Committee

SUBMITTED

André Rodrigues, Technical Scientific Coordinator (Brazil)  
Sport - National Olympic Committee

General Comments

Substances of Abuse are Specified Substances. The text, as it is, could cause confusion and misunderstanding.

Suggested changes to the wording of the Article

Just remove the "Substance of Abuse".

7.4.1 Mandatory Provisional Suspension after an Adverse Analytical Finding or Adverse Passport Finding The Signatories described below in this paragraph shall adopt rules providing that when an Adverse Analytical Finding or Adverse Passport Finding (upon completion of the Adverse Passport Finding review process)<sup>46</sup> is received for a Prohibited Substance or a Prohibited Method, other than a Specified Substance or, Specified Method, a Provisional...

Reasons for suggested changes

The Prohibited List presents two classifications: specified and non specified substances. Including Substances of Abuse as another category could make the understanding there is another classification/category, what I think is not true.

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

The level of documentation required could have a negative impact on organization with little human resources.

Article 8 (12)

Council of Europe

SUBMITTED

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

General Comments

Planning and Documentation<sup>1</sup>. Documentation and Implementation:



- Increased documentation requirements may place a significant burden on smaller Anti-Doping Organizations (ADOs), potentially detracting from direct athlete education. Simplified documentation processes and clear templates were suggested to ease this burden.
  - Annual plans, rather than strategies, should be the focus, and there needs to be clarification on the difference between "documenting" and "developing." Excessive documentation can hinder flexibility, particularly if changes are needed during the year.
2. Research and Theory:
- While WADA's role in housing social science research is welcomed, smaller ADOs are concerned about their ability to implement these findings without additional support. Practical examples of how to apply education theory are welcome.

**FINCIS**

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

**General Comments**

Increased documentation requirements jeopardize and/or may divert an organization's resources away from education itself, which must absolutely be at the center of operations. For this reason, simple and easily followed guidelines, templates, and tools should be created to facilitate as light, efficient and cost-effective documentation as possible.

Many comments from previous articles relate to this point.

**Swiss Sport Integrity**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

**General Comments**

Increased documentation requirements may place a significant burden on smaller Anti-Doping Organizations (ADOs), potentially detracting from direct athlete education. Simplified documentation processes and clear templates were suggested to ease this burden.

**Anti Doping Danmark**

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

**General Comments**

**8.0 Developing the *Education* Program;** *Signatories* should reflect on the role of *Education* in their organization, be clear on their vision and the desired aims of the *Education* Program.

*Signatories* shall use their Sport System Assessment as described in Article 5 and the *Education* Pool as established in Article 6 to determine the program objectives of the *Education* Program. The *Education* Program shall be evidence informed and based on *Education* theory.

*FEEDBACK 8.0*

It is a significant expectation for signatories with only 1-2 employees, who are responsible for all aspects of anti-doping, to also be knowledgeable about education theory. This may be overly demanding for smaller organizations.

**Sport Ireland**

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

**General Comments**

Clear outline of expectations, no further comments

National Anti-Doping Agency (NADA Austria)

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)

NADO - NADO

SUBMITTED

General Comments

We suggest changing the “shall” into a “should” here: “Signatories shall use their Sport System Assessment as described in Article 5 and the Education Pool as established in Article 6 to determine the program objectives of the Education Program. The Education Program shall be evidence informed and based on Education theory.”

Note: This statement is also supported by the PEERS group which consists of Education Experts from (among others) the NADOs of Australia, Austria, Denmark, Germany, New Zealand, Switzerland and USA.

USADA

Tammy Hanson, Elite Education Director (USA)

NADO - NADO

SUBMITTED

General Comments

From the PEERS group:8.0 Developing the Education

We suggest changing the “shall” into a “should” here: “Signatories shall use their Sport System Assessment as described in Article 5 and the Education Pool as established in Article 6 to determine the program objectives of the Education Program. The Education Program shall be evidence informed and based on Education theory.”

For us it is unclear why “Governance of the anti-doping system” is in this list.

National Anti-Doping Commission of Barbados

Adrian Lorde, Chairman (Barbados)

NADO - NADO

SUBMITTED

General Comments

A template should be developed to allow for this to be implemented or the requirement lessened.

USADA

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

SUBMITTED

General Comments

1.

We suggest changing the “shall” into a “should” here: “*Signatories shall use their Sport System Assessment as described in Article 5 and the Education Pool as established in Article 6 to determine the program objectives of the Education Program. The Education Program shall be evidence informed and based on Education theory.*”

2.

For us it is unclear why “Governance of the anti-doping system” is in this list. Stakeholders could use a better understanding.

Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

SUBMITTED

General Comments

Suggestion: This section could be moved to the beginning, after 4.0, as it gives an overview of what an Education Program is, and could be followed by articles 5 to 11 that present the various components of an education program.

Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

SUBMITTED

General Comments

The emphasis placed on an evidence-informed education programme based on Education Theory is noted. There are concerns that this level of expertise may not lie within less resourced NADOs/IFs. As such, if this is to be maintained, the provision of templates would be required.

International Testing Agency

International Testing Agency, - (Switzerland)

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

SUBMITTED

General Comments

8

It may place a considerable burden on signatories with limited resources to also be expected to have expertise in education theory. In some cases, this could be overly demanding and may remain a requirement only on paper. The use of "shall" could be re-assessed in this context.

Article 8.1 (10)

Japan Anti-Doping Agency

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

SUBMITTED

General Comments

8.1.1 - Governance of the anti-doping system

■Unlike other topics, this is not something that is included as a rule in the Code and/or Internationl Standerds, so it is necessary to include an expression or explanation that makes it easy to understand what kind of content is included.

■Article 18 of the Code also requires a description of ‘Governance of the anti-doping system’.

Swiss Sport Integrity

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

General Comments

For small signatories, developing the curriculum will be very challenging. Templates and also support are essential for this new requirement.

Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

SUBMITTED

General Comments

8.1 Curriculum:

Signatories shall use a curriculum that includes all mandatory topics listed [below] and identifies the learning outcomes for each group in the Education Pool. These learning outcomes state what the learner should be ‘aware of’, ‘understand’ and ‘be capable of doing’ for each topic.

FEEDBACK 8.1

Similar to our feedback on section 8.0, we find this requirement to be a significant burden for smaller signatories. To ensure consistency and feasibility, there is a strong need for either a template curriculum or very clear, detailed guidelines to help signatories meet these requirements effectively.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

**Article 8.1.1:** Clarify what is intended as “Governance of the anti-doping system” as a mandatory topic. It is unclear if this requires content on national governance, international governance, or both.

CHINADA

SUBMITTED

MUQING LIU, Coordinator of Legal Affair Department (CHINA)  
NADO - NADO

General Comments

Knowledge Requirements

We have noted the revision and addition in Article 8.1.1 “Mandatory Topics” to Article 8.1 “Curriculum” in the Draft 2027 International Standard for Education. We recommend that WADA further refine and clarify the knowledge requirements for each of these topics, particularly the newly added topics, in the International Standard for Education or Guidelines to ensure consistency of content and standards when anti-doping organizations (ADOs) deliver anti-doping education based on these topics.

Suggested changes to the wording of the Article

We recommend that WADA further refine and clarify the knowledge requirements for each of these topics, particularly the newly added topics, in the International Standard for Education or Guidelines to ensure consistency of content and standards when anti-doping organizations (ADOs) deliver anti-doping education based on these topics.

Reasons for suggested changes

It can help to ensure consistency of content and standards when anti-doping organizations (ADOs) deliver anti-doping education based on these topics.

National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

General Comments

For us it is unclear why “Governance of the anti-doping system” is in this list.

National Anti-Doping Commission of Barbados

SUBMITTED

Adrian Lorde, Chairman (Barbados)  
NADO - NADO

General Comments

A template for the curriculum should be made available

#### Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)  
NADO - NADO

##### General Comments

The ISE draft proposes a curriculum to be a mandatory part of the Education Program. ADSE supports the idea of identifying learning outcomes for the mandatory topics for the different target groups in a NADO Education Pool. That said, we are questioning the benefit of making a curriculum mandatory compared to the workload and administration an ADO will need to create such a curriculum/document. Also, we are questioning for whom an ADO are creating this? This document will need to include at least 11 rows (topics) and approx. 8-10 columns depending on how many target groups an ADO have in the Education Pool. At ADSE we are planning different education activities for our different target groups, and we are therefore already processing this and identifying the learning outcomes in activity plans. In our opinion this requirement is covered in the ISE text as it is written that an ADO must follow up and evaluate their educational efforts.

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

##### General Comments

"Governance of the anti-doping system" is currently not listed in article 18.2 of the Code.

##### Suggested changes to the wording of the Article

We need to harmonise - either we add it to the article 18.2 of the Code or we delete it from the ISE.

##### Reasons for suggested changes

Cf. General Comments

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

##### General Comments

The provision of a curriculum template would be helpful for those organizations who might not have such expertise in-house and/or lack the resources to engage consultants in this area.

### Article 8.2 (3)

#### HADA (HELLENIC ANTIDOPING AGENCY)

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

##### General Comments

1. In the International anti-doping conferences and meetings we have attended, there have been quite a few references by prestigious WADA executives regarding the bear minimum budget percentage that should be invested for education purposes. If we recall correctly it was around 5-7% of total budget. We believe that this should be included and clearly phrased in the ISE.

2. It would be fruitful to employ Social science research to a higher extent and to apply it in a more detailed manner according to each sport tendencies. For example, in some sports there is a tendency for specific prohibited substances, or supplements, or TUES, whereas in other sports there are other tendencies. The education and its evaluation as well could be adjusted not only per target group but per sport as well.

Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

General Comments

There are concerns about whether lesser resources signatories may be 'penalized' during a compliance process if the recourse identified are deemed inadequate.

Chair

Athlete Council, WADA (Canada)

Other

General Comments

Resources

Many athletes are not served by an advanced, well-funded NADO, and some are not served by any NADO at all. These athletes are at an especially high risk for doping, either intentionally or otherwise. The comment to 8.2 states that “WADA will publish educational materials.” We want to highlight the importance of this, as it pertains to reaching athletes from all corners of the globe.

Article 8.3 (3)

Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

**8.3 Use of Research:** Where possible, *Signatories* should seek partnerships in the academic field or with other research organizations, subject-matter experts with research experience to provide support for *Education* Program development, program evaluation and other research purposes

**FEEDBACK 8.3**  
The proposed approach is generally supported, but it may be too demanding for smaller organizations. During the GEC, there was a discussion about storing research on CISP in a searchable format, with a clear link to how the research can be practically integrated into educational programs.

HADA (HELLENIC ANTIDOPING AGENCY)

Dimitris Braoudakis, Education Manager (GREECE)

NADO - NADO

General Comments

Social science is very helpful. However many times we have come across questions which are related with the prohibited substances inclusion process to the prohibited list. People are not covered by just knowing the 2 out of 3 criteria which need to be met for a substance to get designated as prohibited. They need the actual science behind it. NADOs should have access to all the existing and ongoing data of the researches which lead to a substance becoming prohibited. To have this kind of data available would avail NADOs to impact the education pool and to prove to them that serious work is getting done to protect them and that taking prohibited substances is no joke for their health. They need to see what is actually happening when someone uses these substances to his/her health.

University of Birmingham

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)

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

General Comments

In 8.3, it now states that social science research should be used to inform the Education Program. This is a welcome directive but likely represents a significant step from where we are currently.

## Suggested changes to the wording of the Article

Initiatives to encourage less siloed organizational approaches could be helpful, as could further facilitation of collaborations with universities. Additionally, access to scientific research can be limited (e.g., journal paywalls), and the ability to critically assess such research in order to incorporate findings into education is a significant learned skill that many organizations, especially smaller ADOs and federations, will likely not possess. It would be useful to provide centralized resources that summarize key findings in plain language and perhaps provide a framework for using such findings in the development of education initiatives. In addition, ADOs that have received SSR funding could be asked to show how this has informed their education program/plan/activities.

### Reasons for suggested changes

Out of the education plans reviewed to date, only two mention the use of social science research. Consistent with this, when ADO staff were asked about their use of social science research, we saw significant disparities in its use to inform education. This ranged from smaller organizations showing no recognition of the benefits of using social science research at all, to larger organizations that commission social science research to fill gaps in knowledge related to their learning outcomes. However, not all larger organizations could articulate effective use of social science research, with departments closest to social science research not working alongside those designing and delivering education.

## Article 8.4 (8)

### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

#### General Comments

'Possibly conflicting norms:

8.0 "The Education Program SHALL be evidence informed (...)"

8.3 "Social science SHOULD be used to inform the Education Program"

Proposal:

8.0 "The Education Program should be evidence informed (...)"

### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

#### General Comments

UKAD is supportive of this proposed change, however we feel that some of the terminology hasn't been amended. As per the criteria list in 8.4; the definitions listed in 16.3 of the ISE are contradictory to 8.4 therefore may not have been changed.

#### Reasons for suggested changes

This will provide greater clarity for signatories, to avoid any confusion in terminology.

### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

#### General Comments

We would appreciate some examples of program objectives for NADOs in the guidelines.

### HADA (HELLENIC ANTIDOPING AGENCY)

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

#### General Comments

[Comment to Article 8.4: Whilst not mandatory to use, WADA will provide a template as part of its Code Implementation Support Program that can be used by Signatories to summarize their Education Program.]

It would be useful to know when this template is scheduled to be released.

#### National Anti-Doping Commission of Barbados

SUBMITTED

Adrian Lorde, Chairman (Barbados)

NADO - NADO

#### General Comments

Education plans should be published on their website.

#### Suggested changes to the wording of the Article

A summary of the Education Program **shall be encouraged to be** published on Signatories' websites **where possible**.

#### Reasons for suggested changes

Some signatories are by default the NOC. May not have websites or access to these.

#### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

#### General Comments

SIA welcomes the clarity of this new article and feels it will be helpful to signatories preparing code compliant documentation.

#### Suggested changes to the wording of the Article

No suggested changes.

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

#### General Comments

"Mandatory Education requirements" are requested to be shared in both the Education Program and the Education Plan summaries (as outlined in ISE article 10.1 for the Education Plan summary).

#### Suggested changes to the wording of the Article

Delete "The summary shall include any mandatory Education requirements and specify which groups these requirements apply to."

#### Reasons for suggested changes

It seems more relevant to us to request signatories to share the mandatory Education requirements as part of their annual Education plan. This would avoid potential duplication with the Education Program, and would ensure up to date Education requirements as they would be shared on an annual basis.

Please refer to our comments on article 10.1 for comments and suggestions on the use of "mandatory Education requirements".



### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

There remains concern over the level of detail required for the documentation of the Education Programme with NADOs/IFs with limited human capacity in mind.

Consideration of an additional publishing mechanism might be required for Signatories who do not have a website.

## Article 9 (6)

### Council of Europe

SUBMITTED

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

#### General Comments

Articles 9-11 Education and Compliance 1. Template and Guidance Development:

- Importance of having templates for education plans available promptly to aid standardization and reduce uncertainties; concerns about the practicality of translating documents into multiple languages.

2. Educational Appropriateness:

- Education activities should be tailored to the athlete's pathway, age, and other relevant factors.

- More clarification and specificity for international-level athletes, particularly for those who might face language barriers or other challenges before competitions.

3. In-Person vs. eLearning:

- It is recommended that signatories prioritize in-person education before recognizing eLearning, with content clearly set out in separate bullets for clarity.

- There is suggested to replace "shall" with "should" in certain compliance-related statements to reflect practical implementation challenges.

### ONAU

SUBMITTED

JOSE VELOSO, Antidoping Medical Director (Uruguay)  
NADO - NADO

#### General Comments

Greater emphasis is placed on the management of educators from the recruitment process to (re)accreditation

### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### General Comments

In an ideal world, the education activity is well-planned, well-delivered, well-monitored, and well-evaluated. However, the ADO often depend on the setting they are able to get, i.e. 30min slot in a full day activity. Therefore, the focus should always be on the delivery, not on the documentation.

### Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

General Comments

Clear distinct definitions of the Education Program and the Education Plan are good, perhaps more examples of successful programs could be provided in addition to the ISE to allow signatories to aim for the highest standard.

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

Comments placed in their respective section for Article 9

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

General Comments

9.1

We suggest to re-consider the obligation ("shall") to provide the Education Plan to other Signatories upon request, as this may lead to unintended challenges or tensions. Additionally the principle is already covered in ISE art. 10.1.

For the purposes of recognition, this revolves around specific activities rather than the entire program; therefore, information about these activities should be shared instead of the complete plan.

Article 9.1 (7)

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

UKAD is supportive of this proposed change, however we feel that some of the terminology hasn't been amended. As per the criteria list in 9.1; the definitions listed in 16.3 of the ISE are contradictory to 9.1 therefore may not have been changed.

Reasons for suggested changes

This will provide greater clarity for signatories, to avoid any confusion in terminology.

FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

General Comments

"All objectives shall be measurable and time-specific" as a principle and goal is a good idea, although it is challenging to verify 100 percent.

Suggested changes to the wording of the Article

We propose that the verb 'shall' be replaced with 'should.'

Reasons for suggested changes

In practice, verifying this for each target group is impossible, as NADOs cannot directly reach all target groups themselves.

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

### General Comments

The difference between the education program and education plan is still not completely clear. We think a concrete example in the form of a filled out annual education plan template will help.

## National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

### General Comments

There should be some clarification around the wording of timelines and time-specific.

Note: This statement is also supported by the PEERS group which consists of Education Experts from (among others) the NADOs of Australia, Austria, Denmark, Germany, New Zealand, Switzerland and USA.

## USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

### General Comments

From the PEERS group:

### 9.1 Timelines and time-specific

There should be some clarification around the wording of timelines and time-specific.

## Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

### General Comments

Clarity might be required for "The Education Plan shall be provided to WADA and other Signatories upon request in English or French" as it raises questions of whether a signatory demand to see/vet another signatory's programme and the implications of this.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

### General Comments

9.1

We suggest to re-consider the obligation ("shall") to provide the Education Plan to other Signatories upon request, as this may lead to unintended challenges or tensions. Additionally the principle is already covered in ISE art. 10.1.

For the purposes of recognition, this revolves around specific activities rather than the entire program; therefore, information about these activities should be shared instead of the complete plan.

## Article 9.3 (2)

|   |           |
|---|-----------|
| <b>FINCIS</b><br>Tomi Tolsa, Education Manager (Finland)<br>NADO - NADO   | SUBMITTED |
| <b>General Comments</b><br><br>Adapting and tailoring is an important concept. However, organizations should be allowed discretion and flexibility in determining how and for which groups customization and adaptation are realistically most sensible and feasible to implement.  |           |
| <b>Japan Anti-Doping Agency</b><br>Chika HIRAI, Director of International Relations (Japan)<br>NADO - NADO  | SUBMITTED |
| <b>General Comments</b><br><br><b>9.3 - adapt Education Activities</b><br>It would be better if it were made clearer that ‘adapt education activities’ includes not only adjusting the content of activities, but also expanding the scope of ASPs who attend as necessary (for example, in the case of blind RTP athletes, family members who may accompany them in OOCT), as well as follow-up on learning. |           |

## Article 9.4 (3)

|  |           |
|--|-----------|
| <b>Dopingautoriteit</b><br>Robert Ficker, Compliance Officer (Netherlands)<br>NADO - NADO  | SUBMITTED |
| <b>General Comments</b><br><br>We wonder what the difference is between Identification of Education Activities and Type of Education Activities.                       |           |
| <b>National Anti-Doping Agency (NADA Austria)</b><br>David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)<br>NADO - NADO                 | SUBMITTED |
| <b>General Comments</b><br><br>We suggest changing the wording “When Education Activities will be delivered” as frequency is more applicable here.                     |           |
| <b>Caribbean Regional Anti-Doping Organization</b><br>Marsha Boyce, Communications & Projects Coordinator (Barbados)<br>NADO - RADO                                    | SUBMITTED |
| <b>General Comments</b><br><br>Consideration should be given to the additional level of 'paper' required and the impact on organizations with limited human resources. |           |

## Article 10 (4)

|   |           |
|---|-----------|
| <b>NADA</b><br>NADA Germany, National Anti Doping Organisation (Deutschland)<br>NADO - NADO | SUBMITTED |
|---|-----------|

#### General Comments

All paragraphs of article 10.2 and 10.3 should be structured with numbers 10.2.1, 10.2.2....

Signatories should be able to have their activities recognized in order to ease the burden on Athletes.

#### Proposal for an additional paragraph in 10.3:

"In absence of a recognition of the Education Activity by an Anti-Doping Organization within thirty-one (31) days, the requesting Anti-Doping Organization may transfer the request to WADA for further review".

"WADA shall review the circumstances and decide if the Education Activity or parts of it must be recognised."

#### Dopingautoriteit

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

SUBMITTED

#### General Comments

We suggest to use a two-year validity period for received education, using a certification system. We would like to avoid having multiple education requirements to enter subsequent events, leading to over-education

#### Sport Ireland

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

SUBMITTED

#### General Comments

See comments below

#### Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

SUBMITTED

#### General Comments

The inclusion of efforts to minimize duplication of education delivery is welcomed.

#### Article 10.1 (7)

#### FINCIS

Tomi Tolsa, Education Manager (Finland)

NADO - NADO

SUBMITTED

#### General Comments

What is referred to here: 'Make publicly available any mandatory Education requirements for their Education Pool'? Is this the same document as in Article 8.4, 'Summary of the education pool'?

Regarding the statement, 'Consult with other relevant Signatories when planning Education Activities for International-Level Athletes,' IF's should primarily approach NADOs, as IF's are responsible for international-level athletes and their own events.

## Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Denmark)

NADO - NADO

### General Comments

**10.1 Sharing the *Education Plan*** In particular *Signatories* shall:

- Make publicly available any mandatory *Education* requirements for their *Education Pool*;
- Consult with other relevant *Signatories* when planning *Education* Activities for *International-Level Athletes*;
- Share *Education* records with *WADA* and other *Signatories* upon request, and in line with the *International Standard* for Data Protection

*FEEDBACK 10.1*

The principle of coordination amongst signatories is supported. Regarding the requirement for particular information to be publicly available does this mean on an individual ADO webpage, and in which language? Could this be “Make available on request...”

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

### General Comments

Consulting with relevant other Signatories should not only happen when planning education activities for International-Level Athletes, but also for all groups mentioned in article 6.1.2.

For the sharing of education records with WADA and other Signatories privacy laws (e.g. GDPR) will be a legal limitation.

## National Anti-Doping Commission of Barbados

SUBMITTED

Adrian Lorde, Chairman (Barbados)

NADO - NADO

### General Comments

It might not always be practical to document or record all persons attending educational activities if done online.

### Suggested changes to the wording of the Article

**Be encouraged** to share Education records **when available** with WADA and other Signatories upon request, and in line with the International Standard for Data Protection

### Reasons for suggested changes

Might not always have these records

## Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

### General Comments

*A. Make publicly available any mandatory Education requirements for their Education Pool;*

This comment is linked with the comment on article 8.4.

The term “mandatory Education requirements” has not been defined in the ISE and could be interpreted differently by stakeholders. A definition of “mandatory Education requirements” explaining the rationale would be helpful for ADOs to know what the expectations are regarding these “mandatory Education requirements”, where to record them (Education Program or Education Plan?) and the best way to share this information with other signatories.

In addition, if the aim is to share information about the Education program of an ADO, we are concerned that sharing only “mandatory Education requirements” may be not enough. For some ADOs, the Education requirements for their Education Pool are not mandatory (and/or can hardly be made mandatory). As a result, those ADOs may not share many Education activities and therefore reduce the scope of the requirements.

B. *Consult with other relevant Signatories when planning Education Activities for International-Level Athletes;*

The consultation “with other relevant Signatories when planning Education Activities for International-Level Athletes” potentially means for ADOs to consult with numerous signatories. If this is what is meant, it doesn't seem practical, nor realistic.

**Suggested changes to the wording of the Article**

A. In particular Signatories shall:

Make publicly available **any relevant and/or mandatory** Education requirements for their Education Pool on their websites;

B. **As much as possible**, consult with other relevant Signatories when planning Education Activities for International-Level Athletes;

**Reasons for suggested changes**

Cf. General Comments

**Caribbean Regional Anti-Doping Organization**

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

**General Comments**

The provision of education records should be done upon reasonable request.

**Suggested changes to the wording of the Article**

☐ Share Education records with WADA and other Signatories upon **reasonable** request, and in line with the International Standard for Data Protection

**Reasons for suggested changes**

Requests should be within reason to preempt any perceived disparities that might arise.

**International Testing Agency**

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

**General Comments**

10.1

Regarding the first bullet point, we recommend clarifying that the information should be made available to the relevant groups, rather than to the general public. Typically, this is done through targeted communications to key groups (e.g., RTP) rather than through continuous public updates.

Regarding the second bullet point, we suggest narrowing the scope (e.g., in relation to major events), as it seems impractical to consult with other relevant Signatories every time when planning education activities for ILA.

**Article 10.2 (4)**

**UK Anti-Doping**

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

**General Comments**

Based on the new definitions, we believe that Annual 'Education Plan' should read the 'Education Program', in the last sentence.

**Suggested changes to the wording of the Article**

Signatories shall document any such collaboration or delegation in the Education ~~Plan~~ **Program**.

#### Reasons for suggested changes

This will provide greater clarity for Signatories, to avoid any confusion in terminology.

#### FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

#### General Comments

Delegation should not occur unilaterally; instead, it should first be ensured that the other signatory is capable of carrying out the education within its own resource framework.

It is critical to note that IF's cannot delegate their responsibilities directly to NADOs without mutual agreement. For instance, some IF's are currently transferring their educational responsibilities to NADOs in a way that cannot be managed or resourced in advance.

#### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### General Comments

The collaboration and the clarity about the priorities is still not clear. As many NADOs have tailored education to culture, language and country specific topics (medication check), there should be more guidance on what to prioritize. If a 10-year-old ILA has to go through ADEL in English, because an IF is not collaborating with NADOs, there will be a lost opportunity for young athletes to understand the rules in a proper way.

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

#### General Comments

The objectives of Part III are clearly outlined. With clear and defined roles and responsibilities of signatories in Part III, there should be limited discussions around the delivery of education.

#### Suggested changes to the wording of the Article

*Refer to Article 13 on roles and responsibilities for the delivery of Event-Specific Education where applicable.*

*Coordinate with governments or other Public Institutions and National Federations as outlined in Articles 13 and 14.*

#### Reasons for suggested changes

Signatories should be able to refer to Part III of the ISE, which defines Roles & Responsibilities of Signatories and Others.

#### Article 10.3 (13)

#### World Triathlon (ITU)

SUBMITTED

Jeanne Courbe, Anti Doping Manager (Spain)  
Sport - IF – Summer Olympic

#### General Comments

No mention on the article of the language that should be use in the certificate of the ADO. Recognition should be able only if the certificate delivered by the ADO is in english or french



## Brazilian Olympic Committee

SUBMITTED

André Rodrigues, Technical Scientific Coordinator (Brazil)  
Sport - National Olympic Committee

### General Comments

Face to face educations is always better, mainly when we intend deliver, not only information and knowledge, but values.

### Suggested changes to the wording of the Article

10.3 Recognizing Prior Learning

Specifically, Signatories should consider the recognition of eLearning Education Activities as a ~~priority~~ possibility.

## FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

### General Comments

This is a good addition: The responsibility of the quality of the Education remains with the Signatory delivering the Education, not the Signatory recognizing the Education.

However, overall, clear principles and models are needed for recognizing prior learning so that different target groups can effectively avoid the potential duplication issues referred to multiple times in the revised ISE. Currently, there are many challenges in recognizing prior learning among different organizations.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

### General Comments

For SSI, this is still the most complex and frustrating part in education. Recognition is simply to subjectiv and not formalized, which creates a lot of work load. While WADA is auditing ADOs and also reviewing and approving Education Plans / Education Programs, there should be automatic recognition for Code Compliant signatories. Why doulbe and tripple the same work and process?

## RUSADA

SUBMITTED

Viktoriya Barinova, Deputy director (Russia)  
NADO - NADO

### General Comments

We suggest that in clause 10.3 “The responsibility of the quality of the education remains with the Signatory delivering the education, not the Signatory recognizing the education.” specify the criteria of **quality** as well as **the responsibility**.

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

### General Comments

**Article 10.3:** As written, this article is essentially asking ADOs to evaluate education plans of other Code signatories. ADOs should operate under the assumption that all Code signatories have in place an education plan compliant with the ISE unless WADA has confirmed non-compliance through the Code compliance process.

*Proposed Wording:* Signatories **shall** acknowledge the Education Activities carried out by other Signatories and **may** recognize the completion of such Education Activities by learners (in their Education Pool). When determining whether to recognize the completion of Education Activities by learners, the Signatory recognizing the education **should** ensure that the Education Activity has been delivered as per Article 9.2, unless WADA has confirmed non-compliance through the Code compliance process.

## National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)

NADO - NADO

### General Comments

#### Priority of delivery methods

The sentence "Signatories should consider the recognition of eLearning Education Activities as a priority." Seems unclear since in other parts of the ISE "in-person" is the priority.

The last sentence "It can also help Signatories to prioritize and focus their efforts on in-person Education." appears to be very prescriptive. Maybe it is better to say "focus their efforts on other Education Activities (e.g. in-person Education)". On the other hand, if this sentence should say that in-person Education is the best way of education (which it is in many aspects) it should be stated in the key principles in the introduction, not here.

Note: This statement is also supported by the PEERS group which consists of Education Experts from (among others) the NADOs of Australia, Austria, Danmark, Germany, New Zealand, Switzerland and USA.

#### Delivery according to 9.2.

It is not possible to assess whether "the Education Activity has been delivered as per Article 9.2." or not. It may be possible (but also not easy) to assess if the Activity was planned according to Article 9.2., but the delivery can't be assessed by the recognizing ADO.

Since Education programs are aiming to achieve not only knowledge but also how to use the knowledge in real life situations there could be more emphasis on the assessment of the knowledge, understanding and capability of athlete and ASP rather than on the content of the resource that should be recognized.

An example to illustrate this approach: If an athlete wants an eLearning certificate, that was issued by a NADO, recognized by an international federation / MEO, the athlete should be able to demonstrate that they are able to apply their knowledge. They must correctly answer a series of practice-relevant questions that cover all the 11 topics of WADC 18.2. If all questions have been solved correctly, the certificate is recognized. If a question is answered incorrectly, it is obvious that they need more education, and the athlete must complete the respective module to which the question refers (not the whole course).

This approach ensures that the athletes and ASP do not need to finish two courses, but still know the most important topics and how to apply their knowledge. These practice-relevant questions can be adapted according to the athlete pathway.

Maybe this approach is something for the guidelines, but it could also be mention in the ISE as possible assessment strategy.

## Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

### General Comments

While we support the recognition of prior learning, it raises a couple of important questions/concerns.

"The responsibility of the quality of the Education remains with the Signatory delivering the Education, not the Signatory recognizing the Education."

This statement prompts the following concern: If an athlete or ASP competing for Signatory A tests positive and claims they weren't adequately educated or were unaware of the regulations—having been educated by Signatory B—does the responsibility lie solely with Signatory B? Furthermore, would this hold up in a legal case?

If the responsibility rests entirely with Signatory B, there's a risk that when the athlete or ASP competes for Signatory A, the situation could be seen as a "box-ticking" exercise, where Signatory A considers the individual as having been educated without further action required. This poses a concern if the education provided by Signatory B does not meet the standards or requirements of Signatory A, and no attempt is made to upskill the athlete or ASP.

Additionally, under Section 10.1 (Sharing of activities with other signatories), if Signatory B requires a higher standard than Signatory A and requests a meeting or call with the athlete or ASP to address educational gaps, but the athlete or ASP is unable to attend, the responsibility would then shift to Signatory A. This transfer of responsibility could lead to confusion and potential issues, particularly if the upskilling does not take place as needed.

## USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)

NADO - NADO

General Comments

From the PEERS group:

10.3 Recognizing Prior Learning

The sentence “Signatories should consider the recognition of eLearning Education Activities as a priority.” Seems unclear since in other parts of the ISE “in-person” is the priority.

The last sentence “It can also help Signatories to prioritize and focus their efforts on in-person Education.” appears to be very prescriptive. Maybe it is better to say “focus their efforts on other Education Activities (e.g. in-person Education)”. On the other hand, if this sentence should say that in-person Education is the best way of education (which it is in many aspects) it should be stated in the key principles in the introduction, not here.

USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

General Comments

1. 10.3: The sentence “Signatories should consider the recognition of eLearning Education Activities as a priority.” Seems unclear since in other parts of the ISE “in-person” is the priority.  
The last sentence “It can also help Signatories to prioritize and focus their efforts on in-person Education.” appears to be very prescriptive. Maybe it is better to say “focus their efforts on other Education Activities (e.g. in-person Education)”. On the other hand, if this sentence should say that in-person Education is the best way of education (which it is in many aspects) it should be stated in the key principles in the introduction, not here.

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

The recommendation for signatories to acknowledge the education related activities carried out by others is good and benefits athlete with respect to information fatigue.

However, given the tenants established earlier the International Standard, priority should not be given to the recognition of eLearning activities. By entrenching this in writing it potentially creates a negative impact/scenario for those organizations which might prioritize other modalities such as face-to-face delivery (for various reasons).

Suggested changes to the wording of the Article

It is suggested that the following wording be removed:

~~Specifically, Signatories should consider the recognition of eLearning Education Activities as a priority.~~

Reasons for suggested changes

It places emphasis on recognition of elearning activities over other valid delivery methods.

Chair

SUBMITTED

Athlete Council, WADA (Canada)  
Other

General Comments

## Recognizing Prior Learning

Recognition of prior learning is extremely important to athletes. When athletes have a unpleasant experience with education, for example, if it is duplicative and time-consuming, they may develop education-fatigue and ignore future educational efforts.

In the Stakeholder Engagement phase, many ADOs expressed that the process of recognizing previous learning under the 2021 Code was complicated and burdensome. We are concerned that the language proposed in the current red-line draft does not convincingly simplify that process:

“Signatories shall acknowledge the Education Activities carried out by other Signatories and may recognize the completion of such Education Activities by learners (in their Education Pool), provided that the Education Activity has been delivered as per Article 9.2.”

This version still puts onus on a Signatory to vet any prior education for its adherence to the standards set in 9.2, and importantly, makes optional the Signatory’s decision to recognize prior education which satisfies the vetting (“may recognize”). We think the ISE should guarantee the recognition of an athlete’s prior education delivered by a Code-compliant signatory.

### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

#### General Comments

10.3

We support the principles of this provision; however, we recommend refining the language for clarity and effectiveness. The phrase “shall acknowledge the Education Activities” lacks specificity. If the intention is to impose a mandatory obligation (i.e., if there are no alternative acknowledgment actions in the intention of the drafters), we suggest beginning directly with the principle that recognition shall occur, provided that the conditions outlined in Article 9.2 are met.

## Article 10.4 (14)

### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)

Sport - IF – Summer Olympic

#### General Comments

With regards to 10.4.4, it is not obvious to us what ‘at a minimum’ means here? Nor is it clear why the IF would not be involved in pre-Olympic coordination given that this covers IL athletes in most cases who would be captured under IF testing pools/programmes.

With regards to 10.4.6, we wonder whether more needs to be made of the word ‘reinforce’ here to make clear that this education should be supplementary to the pre-event education in 10.4.3 (and that educating an athlete/ASP for the first time at an event is not good practice). Also, if this requirement is mandatory, does this mean that the intention is to conduct event-based education at every INC test? If so we would consider this to be impractical and not a good use of resources for IFs who have a much higher frequency of events (than for example MEOs).

With regards to 10.4, we also wonder whether the content that includes “details unique to that event” should not be considered as information provision or awareness raising as opposed to education?

### Brazilian Olympic Committee

SUBMITTED

André Rodrigues, Technical Scientific Coordinator (Brazil)

Sport - National Olympic Committee

#### General Comments

The National Olympic/Paralympic Committees should be included

#### Suggested changes to the wording of the Article

10.4.3 Athletes and Athlete Support Personnel participating at Events should receive Pre-Event Education. This should be done in cooperation with the local organizing committee, National Anti-Doping Organization, National Olympic/Paralympic Committee and relevant International and National Federations.

### FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)

NADO - NADO

#### General Comments

Formal education should always take place before competitions so that, for example, athletes have enough time to arrange any necessary TUE's in advance. Additionally, during competitions, athletes must be guaranteed the opportunity to focus on their performance. Event-based education works better, for example, through introduction point activities.

10.4.1. Referring to previous comments, IF's should also be responsible for the education of these target groups, as well as the education of minor athletes and their support personnel participating in their events.

#### Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

#### General Comments

10.4.3  
NOC/NPC should also be listed as organisations that should cooperate  
(For example, the JOC/JPC, which is the dispatching organisation, is responsible for Pre-Event Education for the Olympic and Paralympic Games).

#### NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

#### General Comments

Consider adding case studies or examples of successful Event- Based Education initiatives to guide Signatories in organizing education at events.

#### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

#### General Comments

**OVERALL COMMENT: Sections 10.4.1-10.5 could be streamlined and combined into a single, cohesive paragraph:**

**10.4.1 International Federations shall have the authority on any mandatory *Education Activities* for *International-Level Athletes* and *Athlete Support Personnel* participating at their *Events*.**

#### FEEDBACK 10.4.1

We find the current wording problematic, as noted in our comments on Article 6.1.1, as it places full responsibility for mandatory education of International-Level Athletes and Athlete Support Personnel on International Federations (IFs).

NADOs play a key role in educating these groups alongside IFs, ensuring they receive both national-specific and event-specific information without duplicating efforts.

Placing the entire burden on IFs could complicate the process and lead to over-reliance on ADEL. To avoid this, IFs should encourage National Federations (NFs) to collaborate with NADOs for pre-event education. If local options are unavailable, ADEL can be used, but there should be other recognized alternatives for flexibility.

This approach aligns with the new ISE, which states that 'the responsibility for the quality of Education remains with the Signatory delivering the Education, not the Signatory recognizing the Education' (Article 10.3).

**10.4.2 Major Event Organizations shall have the authority on any mandatory *Education Activities* for *Athletes* and *Athlete Support Personnel* participating at their *Events*.**

#### FEEDBACK 10.4.2

This could become very administratively burdensome. We suggest revising the wording to: "Major Event Organizations (MEOs) shall require athletes and athlete support personnel participating at their events to be educated prior to participation." This would simplify the process while ensuring the necessary education is completed in advance.

(Suggestion for ISE Guideline: Documentation of education can be included as part of the information that is already being collected for all athletes.)

**10.4.3** *Athletes and Athlete Support Personnel* participating at *Events* should receive *Pre-Event Education*. This should be done in cooperation with the local organizing committee, *National Anti-Doping Organization* and relevant International and National Federations.

**FEEDBACK 10.4.3**

For the athletes' sake, this provision should be more specifically worded. Athletes participating in events are required to undergo pre-event education. However, since many athletes participate in multiple events throughout the year, it might be helpful to clarify that it should be documented prior to each event that they have received education.

**10.4.5** *Signatories* should deliver *Pre-Event Education* to national teams for major *Events* such as Continental Games, World Championships, and other multi-sport *Events*.

**FEEDBACK 10.4.5**

Please see feedback for 10.4.2

**10.4.6** *Signatories* shall deliver *Event-Based Education* at *Events* where *Testing* takes place to maximize the reach of the *Education Pool* and to reinforce learning. This should be done in accordance with the roles and responsibilities outlined in Article 13.

**FEEDBACK 10.4.6**

This wording is unclear. It would be impossible to reach all athletes at an event. We suggest to use "event-specific education" and clarify that it does not require the presence of an educator.

**10.4.7** At *International Events* International Federations shall deliver *Event-Based Education* to reach those in their *Education Pool*. This should be done in cooperation with the local *National Anti-Doping Organization*, or where applicable, with the *Regional Anti-Doping Organization*, the National Federation and the *Major Event Organization*. *Athletes* and their *Athlete Support Personnel* participating at *International Events* should receive *Pre-Event Education* in advance of the *Event* as per Article 10.4.3.

**FEEDBACK 10.4.7**

This section is confusing and overlaps with 10.4.6. It would be helpful to clarify the distinction between the two to avoid repetition and ensure a clear understanding of the roles and responsibilities regarding Event-Based and Pre-Event Education.

**#11 Evaluating the Education Program**

**Dopingautoriteit**

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

**General Comments**

We doubt the effect and feasibility of event-based education at all events where testing takes place.

Nationally, these events are often organized by the national federations and local event organizers. These organizations are no Signatories of the Code and the NADO can often not enforce event-based education on them.

**USADA**

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

**General Comments**

From the PEERS group:

"Event-Based Education" should be changed to "Event specific Education" here to better encompass what is meant in this with these articles. There does not need to be "Event based Education" at every (international) event.

## Sport Ireland

SUBMITTED

Cóilleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

### General Comments

Helpful to have the redefinition of Event-Based education into Pre-Event Education and Event Based Education. This will ensure athletes and support personnel are adequately prepared for the anti-doping rules and protocols of specific events.

### Reasons for suggested changes

10.4.6 Signatories shall deliver Event-Based Education at Events where Testing takes place to maximize the reach of the Education Pool and to reinforce learning. This should be done in accordance with the roles and responsibilities outlined in Article 13.

- More clarity needed on this. Is this at every event? Or events where the Signatory has the capacity to deliver? Is it in person education or could it be via flyers/infographics/posters etc?

10.4.7 At International Events International Federations shall deliver Event-Based Education to reach those in their Education Pool. This should be done in cooperation with the local National Anti-Doping Organization, or where applicable, with the Regional Anti-Doping Organization, the National Federation and the Major Event Organization.

- Again more clarity, is this every event? Is it in person education or could it be via flyers/infographics/posters etc?

## Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

### General Comments

The expanded explanation of '*Event-Specific Education*' is welcomed. However, "*Pre-Event Education*" is vague and potentially confusing in relation to whether an athlete has been educated recently enough. For example, education delivery in Australia works to ensure athletes receive adequate education at points in the year which may not align with a major event i.e. the start of a season and the National Championships may be at the end. This means an individual was educated six months prior, not necessarily because of an upcoming event but instead allowed them to be educated for greater proportion of their competitive season. We seek clarity as to whether this would be deemed compliant. If so, why? If not, why?

There may be benefit in providing greater clarity in the definition of "*Pre-Event Education*", potentially including a timeframe of relevance.

### Suggested changes to the wording of the Article

No suggested changes.

## USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

### General Comments

10.4: If needle policies are named here, the mention of medical equipment policies (oxygen, cryochambers) or prohibitions of boosting in Paralympics might also be relevant.

10.4.4: Since the (new) focus of the ISE is on minors, the ISE should not only name Olympic and Paralympic Games here, but also Youth Olympic Games and Youth Olympics Festivals (e.g. EYOF).

10.4.6 and 10.4.7: "Event-Based Education" should be changed to "Event specific Education" here to better encompass what is meant in this with these articles. There does not need to be "Event based Education" at every (international) event.

|   |           |
|---|-----------|
| <div>Anti-Doping Sweden</div> <div>Christine Helle, CEO (Sweden)</div> <div>NADO - NADO</div>   | SUBMITTED |
| <div>General Comments</div> <div>ADSE suggests including a definition of the content of Event-Specific Education in Article 10.4. to further emphasize the difference between Pre-Event and Event-Based Education. ADSE suggests including a text explaining that Event-Based Education does not refer to “basic Anti-Doping education” but rather to “information/education for the specific Even”. This will reduce the risk of Signatories delivering basic Anti-Doping education during an ongoing major event when the athletes are preoccupied with other duties.</div>   |           |
| <div>University of Birmingham</div> <div>Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)</div> <div>Other - Other (ex. Media, University, etc.)</div>   | SUBMITTED |
| <div>General Comments</div> <div>The proposed clarifications around education provided prior to and during events are welcome and should help ensure consistent interpretations regarding who has authority over education at events, how it should be coordinated, and the collaborative efforts that should take place.</div> <div>Suggested changes to the wording of the Article</div> <div>Clarifications that help ensure all athletes going to events receive the education they need, without any duplication, may be helpful.</div> <div>Reasons for suggested changes</div> <div>Due to the Paris 2024 Olympics and Paralympics, event-based education has been a major focus for the ADO staff we have been interviewing. Some organizations have suggested that the volume of education has increased significantly, with one suggesting there may be a degree of “education fatigue.” during Olympic years. This was reinforced by athletes we interviewed, who described how they are in “athlete mode” once at the event and do not want to receive education beyond what is required for them to compete cleanly.</div> |           |
| <div>International Testing Agency</div> <div>International Testing Agency, - (Switzerland)</div> <div>Other - Other (ex. Media, University, etc.)</div>   | SUBMITTED |

|   |
|---|
| <div>General Comments</div> <div>10.4</div> <div>We appreciate the aim to clarify roles and responsibilities. However, we believe the current language in arts. 10.4 does not achieve this objective, in particular:<ul style="list-style-type: none"><li>The phrase "shall have the authority" is ambiguous. It is unclear whether it is intended to define strict jurisdiction or merely to establish the authority to act, without implying exclusive responsibility. We recommend clarifying whether the provision grants exclusive jurisdiction to one ADO or if it simply assigns authority over specific educational activities. If exclusive responsibility is intended, this should be clearly stated.</li><li>Education inherently requires cooperation among various stakeholders, as emphasized elsewhere in the ISE. The rigid use of "jurisdiction" or "authority" appears to conflict with this collaborative approach. The term "authority" may not be the most appropriate for education, as it is a shared responsibility, rather than the prerogative of a single entity. In this regard, the current formulation of ISE art. 7.3 which revolves around "prioritizing" groups of athletes rather than creating a "jurisdiction", seems more appropriate.</li><li>The current drafting creates a complex matrix of responsibilities, leading to potential confusion regarding task allocation. The overlapping roles of IFs, MEOs, and NADOs, LOCs, NFs, "Signatories", make it difficult to determine ultimate accountability. This lack of clarity could result in situations where multiple entities assume (or refuse) responsibility, and none are fully accountable, weakening the effectiveness of the provision.</li><li>If the intent is to delineate clear responsibilities, we suggest aligning the language with other provisions in the Code/IS. For instance, using the IST concept of "custodian" could provide greater clarity. Moreover, some prescriptive elements are already addressed in ISE arts. 6.1 and 6.2, which define minimum requirements for education pools, thus reducing the need for further duplication in standalone provisions.</li><li>As a general comment applicable beyond art. 10.4, the increased obligations imposed on ADOs under the revised ISE could potentially create unintended legal risks. There may be a risk of challenges in disciplinary proceedings, particularly if athletes were to attempt to use non-compliance with education obligations as a defense to an ADRV. We recommend further assessing the legal implications of these expanded responsibilities and, if deemed necessary, clarifying that the failure to meet these obligations should not be interpreted as a defense to an ADRV. This is particularly important given the potential for the causal link in Code art. 3.2.3 to be invoked, which, even if unsuccessful, may still require resources to rebut.</li></ul></div> |
|---|



Given the complexities and potential for confusion, we would recommend a broader review of this provision along with art. 13. A third round of consultation would be beneficial to ensure that the language is clear, practical, and concretely enforceable.

## Article 11 (9)

### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

#### General Comments

11.0 - Recommendation to move the following sentence (the purpose) to the top of 11.0, to improve the flow of this section: “*The purpose of monitoring and evaluating is to measure progress....*” and then followed by “*The Education Program shall be evaluated to determine the effectiveness...*”.

11.0 - Suggestion to delete the following sentence; “~~Signatories shall monitor on an ongoing basis their Education Plans~~” – this is covered in 11.1 and thus not needed here.

11.0 - Correction to wording; Based on the new proposed definitions, UKAD believes the following sentence needs to change to say **Education Plan** - “The Education Program shall be evaluated to determine the effectiveness of the Education Program and to inform future Education Plans and Education Activities.”

#### Reasons for suggested changes

Suggestion to improve the flow of the section.

### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

#### General Comments

In an ideal world, the education activity is well-planned, well-delivered, well-monitored, and well-evaluated. However, the ADO often depend on the setting they are able to get, i.e. 30min slot in a full day activity. Therefore, the focus should always be on the delivery, not on the documentation.

### NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

#### General Comments

Consider developing a standardized monitoring and evaluation toolkit to help Signatories better assess their programs without overburdening them.

### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

#### General Comments

It's really hard to measure the effectiveness of an education program. We can at best measure some indicators which can inform future plans and activities.

Sport Ireland

Cóilleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

SUBMITTED

General Comments

Good Clarity as to what's expected

Sport Integrity Australia

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

SUBMITTED

General Comments

The greater clarity provided in relation to evaluation is welcomed – see comments to Article 11.3 Evaluating the *Education Program*

Suggested changes to the wording of the Article

No suggested changes.

Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

SUBMITTED

General Comments

Concern is raised over the level of documentation require to be produced by under-resourced organizations.  
  
However provision to tools and templates to assist will be welcomed.

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

Evaluating the Education Program  
  
We support the approach for evaluating the education program, which includes monitoring the total quantity of learners (11.1), as well as the qualitative impacts (11.2-4). Under 11.4, we would suggest that Signatories collect and monitor data on the percentage of first-time tested athletes who report never having received anti-doping education.

University of Birmingham

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

General Comments

One area in which we have seen the most misunderstandings, disparities, and confusion is monitoring and evaluation. These issues have been evident in both the analysis of education plans and the interviews with ADO staff. Primarily, there is confusion over what monitoring and evaluation are, how they are related but different, and how to address the requirements of the ISE when it comes to evaluation. There also appears to be a reluctance to evaluate the outcomes of education activities. As such, the inclusion of Article 11 to provide better guidance for stakeholders is a welcome addition. In particular, specifying that monitoring relates to the Education Plan and evaluation to the Education Program should help. Elevating information from the guidance document to the ISE is also welcome, as our interviews revealed that not all ADOs have read the guidance document, especially when language is a barrier.

Suggested changes to the wording of the Article

It may be worthwhile to place more emphasis on assessing learning against learning outcomes compared to assessing the learning experience (e.g., learner satisfaction and engagement), as some organizations might prioritize the latter if it is seen as easier (and potentially sufficient) to assess.

In the section on determining impact, it could be useful to elevate the importance of including metrics such as the intention to compete clean, perceptions of the legitimacy of the anti-doping system, vulnerability to doping, moral beliefs about doping, and confidence to stay clean, alongside the incidence of clean sport behaviors. This would provide a more comprehensive assessment of outcomes tied directly to learning outcomes with education provision. It may also be worth highlighting that these measures are most useful when assessing change over time, rather than being used as diagnostic tools.

It could also be helpful to include a template for the evaluation report that organizations could use as guidance when preparing this document for the first time. This might be particularly useful for smaller organizations.

**Reasons for suggested changes**

In some cases, we have seen little monitoring or evaluation, and in others, we have seen monitoring only. We have seen little evidence of effective evaluation to date, although some organizations recognize this and are actively seeking to address this omission. As such, we see assessing learning and evaluating the education program as the two requirements that will be most challenging for organizations and therefore require the most support.

Although a significant proportion of education is aimed at promoting clean sport behaviors, deterring unwanted behaviors remains a focus, so impact indicators should reflect both areas of education focus.

Article 11.1 (10)

World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

General Comments

World Rugby agrees that Article 11 is much more comprehensive and helpful. However:

1. We would request consideration as to whether the practical realities of education for an IF (and MEO?) could be acknowledged here (either in the comment or elsewhere). Typically a NADO will directly coordinate all the education they need to deliver (save for the odd emergency occasion where they might outsource to another NADO when an athlete or team are overseas), whereas for an IF, educating their athlete pool may involve liaison with a wide range of different NADOs and the IF is largely (or at least partly given the NF also have some responsibility, and in some cases may deliver education themselves under their NADO's educator regime/umbrella) reliant on the NADO to maintain these records.
2. We consider that the wording of 11.1.1 could be improved and that we should avoid using education-speak like 'the who, what and when', which risks confusion and seems out of place in a Code document. We acknowledge that the terms are explained in the bullet points below but it still seems incongruous wording.

Suggested changes to the wording of the Article

With regards to the comment to Article 11.1, we would suggest the following addition: "It is acknowledged that Signatories may not be able to record individual attendance at all in-person sessions such as those that are general open-access sessions or during Event-Based Education activities...or where education is outsourced to a local service provider (e.g. an IF outsourcing to a NADO)".

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

Question for clarity. Should the following sentence say *Plan* and not *Program*? As 11.1 refers to the Education Plan; “Monitoring requires the ongoing recording of data to track progress against the Education *Program* objectives”.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

General Comments

**11.1**  
Are the items listed as examples?

If the items listed are mandatory, it may be necessary to make significant changes to the educational tools currently in use, which would be a significant burden for the signatories.

#### 11.1.1 or could be other related location

■Better to utilize the existing WADA platform like ADEL and/or ADAMS to share the education activities between ADOs if one athlete / ASP has taken.

■Athletes and athlete committee members suggested that a platform that allows athletes to check their educational history would be effective for athletes to participate more in education. For example, if the athlete themselves can understand the topics they have learned and the topics they have not, it will not only positively affect their motivation to learn, but it will also help ADO to find out what the athlete needs. When considering the above platform, it would be even better if it could be considered in a style that allows athletes themselves to check (for example, starting with a limited target such as RTP/TP, rather than including recreational level).

### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Denmark)  
NADO - NADO

#### General Comments

**11.1.1 Education Records;** *Signatories* shall keep secure *Education* records of learners attending targeted in-person sessions or completing eLearning courses. At a minimum, records shall include the 'who, what and when' and be in line with the requirements of the *International Standard* for Data Protection.

The 'who' should include; the full name of the learner...

#### FEEDBACK 11.1.1

We suggest changing the text from "The 'who' should include; the full name of the learner," to "The 'who' should **preferably** include; the full name of the learner." This would allow for more flexibility in cases where full names may not be available or necessary.

### FINCIS

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

#### General Comments

Collecting data on the education of athletes at different levels and their support personnel is challenging, as the athlete's pathway varies across different sports. For example, individuals often register in systems only once with a specific profile, meaning that over the years, the athlete's profile does not update as they progress from a young athlete to a national-level competitor, change sports, etc.

### CHINADA

SUBMITTED

MUQING LIU, Coordinator of Legal Affair Department (CHINA)  
NADO - NADO

#### General Comments

### Recording the Number of Participants in Educational Activities

With respect to monitoring and recording the number of participants in the educational program, we note that Article 11.1 “Monitoring of the Education Plan” requires ADOs to record the number of participants in educational activities. Since the same individual may participate in different educational activities several times within a year, we recommend that the number of participation by each individual in different educational activities be recorded rather than the number of participants.

Suggested changes to the wording of the Article

We recommend that the number of participation by each individual in different educational activities be recorded rather than the number of participants.

#### Reasons for suggested changes

The same individual may participate in different educational activities several times within a year,

#### National Anti-Doping Commission of Barbados

SUBMITTED

Adrian Lorde, Chairman (Barbados)

NADO - NADO

#### General Comments

This is not always practical and possible. This should be encouraged.

#### Suggested changes to the wording of the Article

Signatories shall **be encouraged to** keep secure Education records of learners attending targeted in-person sessions or completing eLearning courses. At a minimum, records shall include the 'who, what and when' and be in line with the requirements of the International Standard for Data Protection.

#### Reasons for suggested changes

Not always possible.

#### Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)

NADO - NADO

#### General Comments

Regarding Article 11.1.1 on Education Records:

ADSE understands the purpose of holding individual records of learners attending targeted in-person sessions. That said, we think this will be challenging for Signatories both in developing an administrating digital system for this recording as well as getting an integration with other internal record systems such as E-learning platforms etc. It is only combined with the latter that it makes sense to keep these records. We believe that not all Signatories are ready for this requirement to be mandatory.

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

#### General Comments

Keeping education records of learners attending in-person sessions could prove difficult unless a tool or platform is provided to support signatories record such attendance.

Moreover, for some ADOs, the scope of the audiences attending in-person sessions can be very broad and could potentially represent hundreds of thousands of learners.

Finally, has WADA envisaged to support the clean sport community in the development and implementation of a technical solution to record Education attendance?

#### Suggested changes to the wording of the Article

Signatories **should** keep secure Education records of learners **in their Education Pool** attending targeted in-person sessions or completing eLearning courses.

#### Reasons for suggested changes

Given the difficulty to keep education records of learners attending in-person session and that this is a new requirement, we suggest to replace "shall" by "should" to allow to Signatories to find the appropriate tools and put solutions in place.

The scope of the learners attending in-person sessions can be very broad. We therefore suggest to limit the record of learners in the Education Pool attending targeted in-person sessions or completing eLearning courses.

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

##### General Comments

11.1.1

We fully support the need for improved recording of outcomes from education activities to facilitate effective compliance monitoring. However, we believe the implications of these recording obligations for ADOs should be carefully considered, particularly in relation to disciplinary proceedings and any potential associated risks. Consider whether “shall use best efforts to keep” could be more appropriate. Please refer to our comments on Article 10.4.

#### Article 11.2 (1)

#### Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

##### General Comments

##### Comment to 11.2

To consider the priorities of learning assessment, it would be helpful to add a comment about why ISE focus on in-person Education and e-learning.

#### Article 11.3 (6)

#### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

##### General Comments

This section reads as if it is referring to evaluating the Education *Plan* and not the *Program* based on the new definitions. Suggestion to review and determine if this is correct or whether this needs amending to *Plan* throughout 11.3.

#### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

##### General Comments

The education program consists of elements which are stable over the years (e.g.: vision, curriculum) while the education plan changes more over the years. The education plan is also constantly monitored throughout the year. Therefore, we feel it's more logical to evaluate the education plan on a yearly bases.

#### National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)

NADO - NADO

##### General Comments

A clarification or reference to a guideline document is needed to capture what needs to be evaluated. CCQ questions and other tools that are used by WADA to gather data could be compiled into this guideline so signatories are not surprised which statistics are expected from them.

Note: This statement is also supported by the PEERS group which consists of Education Experts from (among others) the NADOs of Australia, Austria, Denmark, Germany, New Zealand, Switzerland and USA.

## USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

### General Comments

### 11.3 Evaluating the Education Program

A clarification or reference to a guideline document is needed to capture what needs to be evaluated. CCQ questions and other tools that are used by WADA to gather data could be compiled into this guideline so signatories are not surprised which statistics are expected from them.

## USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

### General Comments

11.3: A clarification or reference to a guideline document is needed to capture what needs to be evaluated. CCQ questions and other tools that are used by WADA to gather data could be compiled into this guideline so signatories are not surprised which statistics are expected from them.

## Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

### General Comments

SIA seeks further clarification regarding how WADA require ADOs to evaluate *Education* Programs, and what detail should be captured in the report- ultimately delivered to WADA upon request. A list of examples would be welcomed to ensure consistency and harmonisation of reports from an ADO year to year and additionally, across ADOs in general.

### Suggested changes to the wording of the Article

No suggested changes.

## Article 11.4 (5)

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

### General Comments

### 11.4 - The incidence of Clean Sport Behaviors

As the 'incidence of Clean Sport Behaviors' is unclear, an explanation or example should be given in the guidelines.

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

### General Comments

It's unclear what's meant with the incidence of Clean Sport Behaviors.

### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

#### General Comments

**11.4 Determining Impact** *Signatories* should attempt to determine the impact of their *Education* Program through the monitoring of wider anti-doping data such as: ..... [ ... .. ]

#### FEEDBACK 11.4

The content highlights key data points for monitoring the impact of education programs, such as Clean Sport Behaviors, missed tests, whereabouts violations, TUE applications, and other anti-doping rule violations. While these metrics are valuable, it's unclear how they directly correlate to the success of education initiatives. For example, does a reduction in missed tests or an increase in TUE applications reflect the effectiveness of the education program, or are other factors involved?

Broader metrics, such as athletes' intentions to compete clean, perceptions of anti-doping system legitimacy, and moral beliefs about doping, offer insights into long-term effectiveness. However, clearer guidance on linking these outcomes to education efforts and more specific examples on measuring Clean Sport Behaviors would be helpful.

Monitoring this data is a shared responsibility beyond just the ISE, and effective measurement will require collaborative efforts.

### National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

#### General Comments

Signatories should not only attempt to determine the impact of their Education Program, but of the whole anti-doping programs. Not only is it difficult to be sure if changes in numbers indicated in the list below changed to the Education Program alone, it would also mean a huge step forward for other areas of the anti-doping program if e.g. the impact of testing needs to be evaluated.

The publication of a WADA Education report (as compared to the ADRV Report or Testing Figures report) might also help in this regard.

### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

#### General Comments

11.4

We recommend considering whether all or certain elements of this provision would be more appropriately placed in the Guidelines rather than in the ISE.

## Article 12 (9)

### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

#### General Comments

Please consider revising Figure 1 in Article 12 or removing it from the document. It is very busy and difficult to decipher. We're not sure what it adds?



Council of Europe

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

SUBMITTED

General Comments

Articles 12-15: Roles, Responsibilities, and Future Directions1.      Roles and Authority:

- The roles and responsibilities of different signatories (IFs, NADOs, MEOs) need clearer definition, particularly concerning education. Participants questioned the balance of power between IFs and NADOs, with suggestions to prioritize NADO certification for educators to ensure quality. National anti-doping organizations should have authority over all athletes, not just at the national level.
- Concerns about the discrepancy in authority over athletes between NADOs and IFs, especially regarding who is responsible for educating athletes at different levels (e.g., NOCs vs. NADOs).

2.      Visual and Conceptual Clarity:

- The complexity of the graphic in Article 12 was criticized, with suggestions to simplify it and clarify the relationships between signatories, especially the role of governments, which are not direct signatories but play a significant role. The visual structure should clearly reflect the functions of each signatory and the scope of their authority.

3.      Consistency in Education:

- There is a need for consistency in educational responsibilities and the availability of ASPs for education, with concerns about the consequences if ASPs fail to make themselves available.
- Clarifications on the use of batch-tested supplements and other practical details related to compliance.

Japan Anti-Doping Agency

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

SUBMITTED

General Comments

12.0  
■The orange arrows in the figure should be explained.  
  
■(If the orange arrows indicate a direct relationship with responsibilities, then) don't you think an orange arrow is needed between MEO and NOC/NPC?  
For example, in the case of the Olympic and Paralympic Games, not IFs, but the NOC/NPC, which is the delegation organisation, has the role of providing education to the participating athletes and ASPs. In order to ensure education by the NOC/NPC, the NF and NADO cooperate in domestic level.

Swiss Sport Integrity

Ernst König, CEO (Switzerland)  
NADO - NADO

SUBMITTED

General Comments

While SSI appreciates the attempt to create more clarity about roles & responsibilities, there are a lot of contradictions and problematic definitions. Also the word "authority" raises a lot of questions, prompting conflicts between IFs and NADOs instead of promoting collaboration.

FINCIS

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

SUBMITTED

General Comments

It is important to clarify the roles of different stakeholders in the image or diagram. As it stands, it seems that IF's are positioned above NADOs, although they should be considered equal actors. The image also gives the impression that NADOs are not involved in the education of international-level athletes, whereas in practice, NADOs primarily carry out the education of international athletes at the national level.

Sport Ireland

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

SUBMITTED

General Comments

Not sure the "Athletes education before they leave their country" and arrow associated with it is very clear?

National Anti-Doping Agency (NADA Austria)

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

SUBMITTED

General Comments

The division of responsibilities graphic is quite confusing and doesn't allow the nuance we have tried to provide in various comments about the risk of non-sport or culturally specific education duplication for ILA.

USADA

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

SUBMITTED

General Comments

1. The division of responsibilities graphic is quite confusing and doesn't allow the nuance we have tried to provide in various comments about the risk of non-sport or culturally specific education duplication for ILA.

We also believe that international level athletes should be educated by their NADO to incorporate cultural context and use of country specific tools and resources.

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

Roles and Responsibilities (12 - 14)

We appreciate the aim of Articles 12-14 to clarify the roles and responsibilities of Signatories. Overlapping roles and responsibilities create a risk to athletes of duplication or confusion.

Article 13 (13)

Bhutan NADO

Nima Gyeltshen, Director (Bhutan)  
NADO - NADO

SUBMITTED

General Comments

13.1.4 In addition to the above, National Anti-Doping Organizations may have a role in educating the following: ☐ Youth Athletes, in cooperation with National Federations; and ☐ Children and youth through school and/or sports club programs in cooperation with public authorities, which may include promoting the integration of Values-Based Education into the existing Education or sport system.

- Add point: Need to consider adding colleges and coaches institutes.

Suggested changes to the wording of the Article

13.1.4 In addition to the above, National Anti-Doping Organizations may have a role in educating the following: ☐ Youth Athletes, in cooperation with National Federations; and ☐ Children and youth through school and/or sports club programs in cooperation with public authorities, which may include promoting the integration of Values-Based Education into the existing Education or sport system.

- incorporate Clean sports education in the colleges, teachers training college, and coaches institutes as part of their border learning.

Reasons for suggested changes

Providing Clean sports education as part of the college, teacher training and coaches institutes will have greater and more impact as they get placed in schools.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

While SSI appreciates the attempt to create more clarity about roles & responsibilities, there are a lot of contradictions and problematic definitions. Also the word "authority" raises a lot of questions, prompting conflicts between IFs and NADOs instead of promoting collaboration.

NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

General Comments

Provide more detail on how Signatories should engage with Governments and National Federations that may have competing priorities. (Related to both - Articles 13 and 14)

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

Consider combining Article 6 and Article 13. As currently written, there is a need to refer to two separate Articles to gain a wholesome understanding of Signatories roles and responsibilities. Consolidating all information at the onset of the ISE would allow for an easier comprehension of the Standard.

National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

General Comments

The whole article needs reconsideration, see comment to article 6 on this.

Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

General Comments

Roles and responsibilities are clear

USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

General Comments

From the PEERS group:

The whole article needs reconsideration, see comment to article 6 on this.

Authority vs. responsibility

As opposed to a “Testing Authority” there is no definition what an “Education Authority” means and what consequences there are if this term is defined. Therefore we suggest to either define this term or change the wording from authority to “Responsibility”.

Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

General Comments

SIA acknowledges that the scope of the Guidelines for the *International Standard for Education* (ISE) could be expanded and potentially could include that ADOs should consider that sample collection personnel, educators and investigators undertake training related to basic human rights i.e. gender diversity, child safeguarding training and potentially others that could include anti-racism or anti-harassment and discrimination training. See comments to 5.3 (5.3.2) of the ISII and to Annex L of the IST.

Reasons for suggested changes

To ensure all personnel involved in anti-doping activities are better prepared to interact with *Athletes* who are vulnerable (i.e. minors and those with impairments) and those from different backgrounds including those who are gender diverse. Code Article 18 emphasizes the importance *Education* plays in anti-doping, aiming to preserve the spirit of sport and protect *Athlete* rights. Although SIA is not recommending a change to Code Article 18, future iterations of the Code could consider other social standards to ensure that no individual is at risk of being subjected to discrimination or harassment. The way education or sample collection is delivered and / or implemented, significantly impacts how *Athletes* perceive and trust ADOs. The respect and rights of athletes should be at the forefront when making any changes to the Code and International Standards.

USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

General Comments

1. The whole article needs reconsideration, see comment to article 6 on this.
2. Authority vs. Responsibility
3. As opposed to a “Testing Authority” there is no definition what an “Education Authority” means and what consequences there are if this term is defined. We suggest to either define this term or change the wording from “authority” to “responsibility”.

Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)  
NADO - NADO

General Comments

- As mentioned in the feedback for Article 6, we are wary of the requirement for International Federations to take responsibility over the education of International Level Athletes.

*“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”*

Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

General Comments

When it comes to the education pool and international-level athletes, we very often hear from athletes about duplication of education and “education fatigue”. We think that a slightly different and subtler distribution of audiences could help minimize the duplication and the “education fatigue” they refer to.

Because international-level athletes very often mix with national-level athletes, this wouldn’t represent an additional burden for a NADO since they already cover national-level athletes.

Finally, this could potentially result in more tailored education.

Below is a suggested distribution:

Education Pool

- International Federations: responsible for RTP/TP athletes and ASP
- NADOs: responsible for all other international-level athletes (not in IFs RTP/TP) and national-level athletes
- MEOs: responsible for participants to their event (except for the delegations – athletes and ASP, already covered by IF or NADO)

Event-specific Education

- International Federations: set the requirements for their events; responsible for the education delivery for their RTP/TP athletes and ASP, unless delegated to the NADO
- NADOs: responsible for the delivery of pre-event education for all athletes and ASP taking part in this event (unless already covered by the IF) in cooperation with NOC/NPC and NFs
- MEOs: set the requirements for pre-event education; responsible for the delivery of Event-based education (not Pre-event)

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

The inclusion of the roles and responsibilities of signatories is welcomed.

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

General Comments

Clarifying the roles and responsibilities of a broader range of signatories is a useful addition. This should help specify what signatories are—and are not—responsible for. Related to this, our interviews revealed significant resources being invested by some ADOs into recognizing education delivered by others. As such, we see deemphasizing recognition in ISE 2027 compared to ISE 2021 as a welcome update, one that should help ensure resources are used more effectively towards the ambitions of the ISE.

Alongside this, the inclusion in 10.3 that “The responsibility of the quality of the Education remains with the Signatory delivering the Education, not the Signatory recognizing the Education” should also help prevent organizations from allocating too many resources towards activities related to the recognition of education delivered by others.

Suggested changes to the wording of the Article

In addition to the changes already made, it may be worthwhile to encourage organizations to ensure awareness-raising activities are either the direct responsibility of the education team within an ADO, or at the very least, that the education team has oversight of communications from an ADO. This applies to Article 14 as well.

Reasons for suggested changes

This suggestion is based on interviews with ADO staff that revealed communications departments sometimes disseminate messages without input from the education department, which can result in communications that are at odds with the messages the education department wants to convey. This relates to Article 14 as well, because RADOs may also benefit from ensuring communication departments are conveying messages consistent with their education departments awareness raising activities.

Ministry of Health, Welfare and Sport

Bram van Houten, Policy adviser (Netherlands)

Public Authorities - Government

SUBMITTED

General Comments

As with Code-article 20.5.9, we propose to delete this article. While we understand the underlying thought of this article, whether a national anti-doping organization is able to live up to this requirement depends not only on its own activities, but to a large extent also on factors that are outside their control. If the article were to be limited to the nado’s actions, it could say that each nado should strive to be the authority. But an article with such a formulation would be very imprecise as to what actions are expected from a nado, and would be impossible to monitor. Therefore, despite the fact that we underline this ambition, we think this article should be deleted.

Suggested changes to the wording of the Article

Delete this article.

Reasons for suggested changes

While we understand the underlying thought of this article, whether a national anti-doping organization is able to live up to this requirement depends not only on its own activities, but to a large extent also on factors that are outside their control and thus brings the nado in a very vulnerable and impossible position.

If the article were to be limited to the nado’s actions, it could say that each nado should strive to be the authority. But an article with such a formulation would be very imprecise as to what actions are expected from a nado, and would be impossible to monitor. Therefore, despite the fact that we underline this ambition, we think this article should be deleted.

Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

SUBMITTED

General Comments

13.1.5 - National Federations are key partners when it comes to clean sport education. However, for harmonization purposes (content, key messages, up-to-date information, etc.), the training of educators should remain the responsibility of the NADO.

Suggested changes to the wording of the Article

A. Insert a general paragraph at the beginning of article 13.0, rather than having it in each sections : “*Signatories should support the principle that an Athlete’s first experience with anti-doping should be through Education rather than Doping Control.*”

B. *National Anti-Doping Organization shall support National Federations to conduct education when required by International Federations as per Code article 20.3.13. Where in-person Education takes place, National Federations shall use trained and accredited Educators.*

*National Anti-Doping Organizations shall be responsible for the training and accreditation of Educators used by National Federations.*

Reasons for suggested changes

A. This principle should be supported by all signatories.

B. Cf. General Comments on 13.1.5

International Testing Agency

International Testing Agency, - (Switzerland)

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

SUBMITTED

General Comments

13.1.7

We suggest to better clarify the intent and practical application of the provision

## Article 13.2 (6)

### World Triathlon (ITU)

SUBMITTED

Jeanne Courbe, Anti Doping Manager (Spain)  
Sport - IF – Summer Olympic

#### General Comments

It seems that recruiting Educators should be done by the ADO together: IF and NADO can work together to recruit Educators that will speak to Athletes in the country in their own language (specialy for the Youth Athlete, and the Master Athlete ect).

### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

#### General Comments

Footnote comment to 13.2.4 - UKAD disagrees with this approach of the ISE empowering NFs to train and accredit their own Educators. Please consider removing.

#### Reasons for suggested changes

Keeping this would create a number of quality assurance and control challenges over who and what is being delivered, as well as resource challenges for a NADO. From a UK perspective, accrediting and quality assuring a third-party NF's Educator training programme, as well as running our own Educator training programme is not something we will have resource or capacity to do, as may be the case for other signatories.

### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

#### General Comments

**13.2.2** International Federations shall be the authority for *International-Level Athletes* and associated *Athlete Support Personnel*. This shall be their primary responsibility for *Education*.

#### FEEDBACK 13.2.2

Please see feedback for 6.1.1. and 10.4.1

**13.2.4** The International Federation shall require National Federations to conduct *Education* in cooperation with the applicable *National Anti-Doping Organization* as per *Code* Article 20.3.13, in particular for *Event-Specific Education*.

#### FEEDBACK 13.2.4

Please note that National Federations (NFs) are not signatories to the Code. The wording should be adjusted accordingly. For example, it could be rephrased to state that International Federations (IFs) can request their National Federations to ensure that their athletes and support personnel are educated, and this can be done in cooperation with the applicable NADO.

### Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

#### General Comments

[Comment to Article 13.2.4: It is acknowledged that National Federations may train and accredit their own Educators. Where this is the case they shall have such Educator training programs and/or individual Educators authorized by a Signatory to help maintain standards of Education delivery.]

### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

#### General Comments

Please refer to comments in Article 6.1 in relation to concerns around IF sole authority for International Level athletes.

#### Suggested changes to the wording of the Article

##### 13.2.2

“International Federations shall be the authority for International-Level Athletes and associated Athlete Support Personnel. This shall be their primary responsibility for Education **with prioritization of effort given to athletes from countries/regions where NADOs are unable to ensure adequate education. NADO education recognition is encouraged for those from countries/regions that are able to ensure adequate education.**”

#### Reasons for suggested changes

The comment provided to Article 13.2.2 provides some reassurance that there is acceptance that *NADOs* will look to educate their *International-Level Athletes* and ASP. However, noting the requirements on *NADOs* educating *National-Level Athletes* and the likely pathway for most sports – our view as a *NADO* is that the onus should be on the *IF* to recognise the education of the *NADO* as standard in order to reduce duplication, allowing them greater resource to work with *Athletes* in their sport who may not have access to adequate *Education* via their *NADO/RADO*. For *NADOs* to ensure *Athletes* are being educated at earlier stages on their way to the international level, will provide greater confidence in an *Athlete's* first experience with anti-doping should be through *Education* rather than doping control.

### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

#### General Comments

Article 13.1.1 states that “each National Anti-Doping Organization shall be the authority on Education as it relates to clean sport within their respective country”. For harmonization purposes (content, key messages, up-to-date information, etc.), the training and accreditation of educators should remain under NADO competency.

#### Suggested changes to the wording of the Article

Delete Comment to Article 13.2.4

#### Reasons for suggested changes

Cf. General Comments

## Article 13.3 (5)

### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 13.3:** The role of the MEO described in this article appears to duplicate work already being completed by ADOs (NADOs and IFs) during a pre-Games period. It is therefore suggested that the MEOs role be focused on the timely and clear publication of rules and guidelines to allow ADOs to adequately educate their event-bound teams in advance of Games.

### USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO



General Comments

From the PEERS group:

13.3.4 Deletion of “any”

We suggest deleting the word “any” since it is not needed and only confuses.

Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

General Comments

Article 13.3.4: SIA suggests removing the word ‘any’ for clarity and that it is a must for MEOs.

Suggested changes to the wording of the Article

13.3.4 *Major Event Organizations* shall set ~~any~~ *Pre-Event Education* requirements for their *Events* and ensure that the necessary information such as the anti-doping rules for the *Event* is made publicly available

Reasons for suggested changes

The Regional Conversations at the 2024 GEC showed that one of the biggest struggles facing ADOs was mandating education. ADOs welcomed the education mandate set for participation at the Asian Games because it provided a ‘stick’ to mandate education and increase completions. Given the impact MEOs can have on supporting education efforts, SIA believes that the task of setting education requirements should be a requirement for all major events.

USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

General Comments

- 1. 13.3.4 Deletion of “any”: We suggest deleting the word “any” since it is not needed and only confuses.

13.3.5 Last sentence: The sentence “Event-Based Education has the potential to reach and positively impact wider audiences, including the spectators, general public and media.” We recommend moving this sentence to the Introduction.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

13.3.3

We suggest to reconsider whether it should be the role of MEOs to “recruit, train, assess, accredit, reaccredit and authorize Educators as per Article 7 of the *International Standard for Education*”.

Article 13.4 (1)

USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)

NADO - NADO

General Comments

From the PEERS group:

### 13.3.5 Last sentence

The sentence “Event-Based Education has the potential to reach and positively impact wider audiences, including the spectators, general public and media.” is well written but there is no point in having it in this place since this is about roles and responsibilities. We suggest moving this sentence to the Introduction.

## Article 14 (6)

### NADA

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

SUBMITTED

#### General Comments

Proposed additional 14.5.7:

"If an Anti-Doping Organization does not respond to the request of recognition from another ADO within 31 days, WADA shall review the circumstances of recognition among those Signatories and decide if an Education Activity or parts of it shall be recognised."

### Swiss Sport Integrity

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

#### General Comments

While SSI appreciates the attempt to create more clarity about roles & responsibilities, there are a lot of contradictions and problematic definitions. Also the word "authority" raises a lot of questions, prompting conflicts between IFs and NADOs instead of promoting collaboration.

### Sport Ireland

Cóilleen Devine, Director of Anti-Doping & Ethics (Ireland)

NADO - NADO

SUBMITTED

#### General Comments

All clear

### Sport Integrity Commission Te Kahu Raunui

Jono McGlashan, GM Athlete Services (New Zealand)

NADO - NADO

SUBMITTED

#### General Comments

- As mentioned in the feedback for Article 6 and 13, we are wary of the requirement for International Federations to take responsibility over the education of International Level Athletes.

*“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”*

### Caribbean Regional Anti-Doping Organization

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

SUBMITTED

#### General Comments

Article 14.4.3 clarity is required as to the role being outlined for RADOs here, particularly as it relates to making content and material "available to ". This is unclear.

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

Athletes’ Right to Education

We support the inclusion of this language in the ISE, in line with Article 7 of the Athlete Anti-Doping Rights Act.

Article 14.1 (1)

National Anti-Doping Agency (NADA Austria)

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

SUBMITTED

General Comments

ASP have a right to be educated. This needs to be reflected here as well. See also comment on 1.0 Introduction and Scope - Athlete Support Personnel’s Anti-Doping Rights Act.  
NADA Austria fully supports that Athletes and Athlete Support Personnel shall make themselves available for Education and actively participate as required to comply with Code Article 21. However, when working with adults it must also be accepted that they deliberately decide not to participate. If they choose to do so, they should be warned about the potential consequences (inadvertent doping, not having the latest infos, weaker position in anti-doping proceedings regarding no-fault, negligence, etc.) and maybe even sign a letter stating that they don’t want to be educated (again), but it cannot be the fault of the ADO if adults (or parents/guardians of minors) decide that they don’t want to participate.

Article 14.2 (5)

Brazilian Olympic Committee

André Rodrigues, Technical Scientific Coordinator (Brazil)  
Sport - National Olympic Committee

SUBMITTED

General Comments

National Olympic or Paralympic Committees, sometimes have a greater possibility to support their National Federations in terms of delivering anti-doping education.

Suggested changes to the wording of the Article

14.2.4. National Federations can request support from their National Olympic or Paralympic Committee to deliver education, mainly with their National teams previously for Major events, like World Championships and Olympic/Paralympic Games.

Reasons for suggested changes

National Olympic/Paralympic Committees are "closer" of the athletes than NADOs. Because it, the educational activities can happen in a more profitable way.

UEFA

Thomas Rossier, Anti-doping Coordinator (Switzerland)  
Sport - Other

SUBMITTED

General Comments

Good to highlight the role of NF in the ISE. Would be good to precise that NF not only needs to cooperate with NADO but also with IF for the purpose of anti-doping education.

Anti Doping Danmark

Silje Rubæk, Legal Manager (Denmark)

NADO - NADO

SUBMITTED

General Comments

**14.2 National Federations** should support the principle that an Athlete's first experience with anti-doping should be through Education rather than Doping Control

**14.2.1** National Federations should consider the role and contribution they can make in the development and delivery of Education Programs.

**14.2.2** National Federations should proactively cooperate with the National Anti-Doping Organization in their country where one exists for the purposes of Education.

**14.2.3** National Federations should enable the delivery of Education by providing access to *Athletes* and *Athlete Support Personnel*.

*FEEDBACK 14.2 – 14.2.3*

We agree with the principle and believe it is a positive approach. However, we find it challenging to assign responsibility to a group that is only indirectly subject to the rules. This makes it difficult to formalize their role in the regulations.

National Anti-Doping Agency (NADA Austria)

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)

NADO - NADO

SUBMITTED

General Comments

Although it may not be possible to make this mandatory, but at least a strong recommendation, that National Federations should only use Educators (trained and accredited as stated in the definition) for the delivery of Education Activities would be beneficial. There might even be a statement that the International Federation may decide not to recognize activities which are not delivered by Educators.

USADA

Tammy Hanson, Elite Education Director (USA)

NADO - NADO

SUBMITTED

General Comments

From the PEERS group:

**14.2.2 Include Educators**

Although it may not be possible to make this mandatory, but at least a strong recommendation, that National Federations should only use Educators (trained and accredited as stated in the definition) for the delivery of Education Activities would be beneficial. There might even be a statement that the International Federation may decide not to recognize activities which are not delivered by Educators.

Article 14.3 (3)

Ministry of Health, Welfare and Sport

Bram van Houten, Policy adviser (Netherlands)

Public Authorities - Government

SUBMITTED

General Comments

This article should be deleted from the standard. Its contents go beyond a public authority’s commitments under the UNESCO Convention, and it ignores the fact that legislation and governments are not subject to the Code and are not accountable to WADA. As such, this article gives a false representation of facts, and should be deleted.

**Suggested changes to the wording of the Article**

This article should be deleted.

**Reasons for suggested changes**

This article should be deleted from the standard. Its contents go beyond a public authority’s commitments under the UNESCO Convention, and it ignores the fact that legislation and governments are not subject to the Code and are not accountable to WADA. As such, this article gives a false representation of facts, and should be deleted.

**RUSADA**

SUBMITTED

Viktoriya Barinova, Deputy director (Russia)  
NADO - NADO

**General Comments**

We propose to introduce in art.14.3. the requirement for the Governments to assist NADO in the implementation of educational programs.

**Suggested changes to the wording of the Article**

14.3.3. Governments should cooperate with the National Anti-Doping Organization in their country where one exists for the purposes of education

**Reasons for suggested changes**

This point can be a support in building a coherent and coordinated system of Education, taking into account the authority of NADO according to the Standard

**Caribbean Regional Anti-Doping Organization**

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

**General Comments**

Article 14.4.3 clarity is required as to the role being outlined for RADOs here, particularly as it relates to making content and material "available to ". This is unclear.

**Article 14.4 (1)**

**USADA**

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

**General Comments**

- 1. 14.4.2 & 14.4.3 : clarity around “for all” – does this encompass countries globally or within their region

**Article 14.5 (1)**

**USADA**

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

**General Comments**

Define “periodically”

**Article 15 (9)**

**World Rugby**

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

**General Comments**

World Rugby considers that this is an excellent addition to the Standard.

**ONAU**

SUBMITTED

JOSE VELOSO, Antidoping Medical Director (Uruguay)  
NADO - NADO

**General Comments**

No Comments

**NADA India**

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

**General Comments**

Consider developing templates for the key documents to help Signatories ensure compliance without excessive administrative burden.

**Anti Doping Danmark**

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

**General Comments**

*FEEDBACK 15.1 – 15.4*

Please consider the feedback provided in the previous sections. Additionally, take into account any potential consequences that may arise from these suggestions.

**FINCIS**

SUBMITTED

Tomi Tolsa, Education Manager (Finland)  
NADO - NADO

**General Comments**

This sentence seems incomplete: "The Code Compliance process and associated consequences as outlined in the International Standard for Code Compliance by Signatories"

**Sport Ireland**

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

**General Comments**

All clear

**Sport Integrity Australia**

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

**General Comments**

SIA welcomes the clarity provided throughout Article 15

Suggested changes to the wording of the Article

No suggested changes.

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

While accountability is key for programmes to run effectively and be impactful, there is concern over the level of documentation required to be produced by lesser resourced organizations.

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)  
Other - Other (ex. Media, University, etc.)

General Comments

Whilst the templates that will be provided for the education program and education plan are welcome, it would be useful to also provide these for the curriculum and evaluation report.

Suggested changes to the wording of the Article

Given the curriculum and evaluation report are being included for the first time, it could be helpful to also provide and make reference to templates for these documents.

Reasons for suggested changes

Given these documents are being included for the first time, it is likely that this is where we might see the most confusion. There appears to be a wide disparity in the interpretation of requirements for mandatory documentation, and it appears that some organizations are simply trying to comply with ISE checklists rather than produce meaningful plans and evaluations. This may be due to a lack of appropriate expertise within some organizations, and exemplar documents and templates would provide significant support in such cases.

Article 15.2 (2)

National Anti-Doping Agency (NADA Austria)

SUBMITTED

David Müller, Head of Information & Education, Quality Manager, Medicine (Austria)  
NADO - NADO

General Comments

We suggest changing “Learning outcomes” to “Learning Objectives” here and in other parts of the ISE where the planning process described and not the evaluation process (e.g. 8.1, 9.1., 9.2., 15.3.).

USADA

SUBMITTED

Tammy Hanson, Elite Education Director (USA)  
NADO - NADO

General Comments

From the PEERS group:

15.2 Learning Objectives

We suggest changing “Learning outcomes” to “Learning Objectives” here and in other parts of the ISE where the planning process described and not the evaluation process (e.g. 8.1, 9.1., 9.2., 15.3.)

World Rugby

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

SUBMITTED

General Comments

Re: the definition of Pre-event education, World Rugby wonders whether this definition needs to be refined with regards to the point: ""...with the aim of sharing the specific anti-doping requirements related to that Event"". We are concerned that if we share specific AD requirements related to an event (though accepting its not 100% clear what this would be) wouldn't this give some degree of advanced notice of testing taking place at an event? This makes sense for Major Events and World Championships where it's obvious testing will take place (because of the level of competition), but there are some lower level events where this may not be the case. "

Japan Anti-Doping Agency

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

SUBMITTED

General Comments

**16.3 - Event-Specific Education:**

■In particular, at the major events (i.e. Olympic and Paralympic Games), the organisation that delivers education differs between the period of the events and before the events, so we understand the intention to clarify the roles of each organisation and emphasise education before the event.

However, there is a possibility of confusion due to the close similarity of the words `Event-Specific` and `Event-Based`. Therefore, it is preferable to only use the terms `Event-Based Education` and `Pre-Event Education`.

■Needle policy is not under the Code or international standards, so there is no need to include it in the ISE as an example.

**16.3 - Clean Sport Behaviors:**

■We strongly agree with the definition of `Clean Sport Behaviors`. In order to ensure that there is a common understanding among stakeholders including athletes and ASPs, we would like to see the ISE or guidelines include specific details that can be linked to the education outcomes/objectives and learning objectives.

■Given that education is emphasised as a prevention strategy in the Code, the key words of the `Clean Sport Behaviors` should be included and referred to in the Code as well as in the ISE.

Dopingautoriteit

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

General Comments

The appendix is not completely updated yet. It has 2021 definitions which need to be changed for the ISE 2027 (like education program and education plan)

We suggest to include a definition of medical personnel.

Sport Ireland

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

SUBMITTED

General Comments

Clear definitions and good additions made

USADA

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

SUBMITTED



General Comments

- Definition of face-to-face
- Definition of other delivery methods
- Pre-Event Education
- Clean Sport Behaviors

Suggested changes to the wording of the Article

We recommend including a definition of face-to-face in the definitions which clarifies that face-to-face may include physical and virtual in-person sessions and then use the term “in person” education throughout the ISE.  
In addition to the definition of face-to-face, there should also be other definitions, e.g. for eLearning, outreach.  
The definition Pre-Event Education is without a specific timeline. It seems feasible to define what is to be considered as Pre-Event Education

There are many references to “Clean Sport Behaviors”, but if mandatory, these need to be specified in ISE.

Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

General Comments

Event-specific Education: for clarification purposes, perhaps the definitions around event-specific education could be reviewed to have only two definitions: Pre-event education and Event-based education (in this case rendering Event-specific Education not necessary).

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

General Comments

General comment to the entire Standard:

We recommend conducting a further review of the use of "should" and "shall" throughout the entire document to ensure consistency with other standards. Additionally, we suggest considering whether certain sections might be more appropriately placed in the Guidelines rather than the Standard, in order to maintain the focus and clarity of the Standard.