

# 2027 Code & International Standard Update Process : Stakeholder Engagement Phase - International Standard for Education (ISE)

Showing: All (238 Comments)

## Concept #1 – Recognition of Education Programs (35)

### International Taekwon-Do Federation ITF Vienna

SUBMITTED

Frank Diaz, AD Education Officer (Spain)

Sport - IF – Other

I would redefine the word "Recognition, maybe acknowledgement or certification program.

### World Triathlon (ITU)

SUBMITTED

Jeanne Courbe, Anti Doping Manager (Spain)

Sport - IF – Summer Olympic

The Athlete's profile in ADAMS should have a tab for Education where the ADO could upload the Education certificate and could be consulted by any ADO for recognition.

### FEI

SUBMITTED

Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)

Sport - IF – Summer Olympic

The principle of "Recognition" would reach full potential if it was supported by a WADA certification system for ADOs education programmes.

### World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

The issue as we see it is perhaps more a need to make recognition easier by having more information about a programme, possibly over and above ISE and Code compliance (if such a thing could be achieved). We have provided some considerations on this point below.

Recognition of NADO programmes for IFs (or vice versa) is particularly important where the programme structure relies on some delivery by another signatory (for example Face-to-Face (FTF) learning in the athlete's own language delivered by a NADO on behalf of the IF). If the NADO is compliant, an IF can (if it chooses to) automatically recognise the programme without having to directly evaluate it and 'approve' its contents. However, the compliance process that this relies on, can only assess adherence to ISE requirements, and cannot go further (e.g. with a subjective assessment of content/quality), which means that the IF either has to evaluate each programme itself or assume that all compliant programmes are comparable. If the IF evaluates each national programme, this can be very resource-heavy and to a large extent impractical (and more so with certain languages), particularly for Face-to-Face (FTF) learning, as while e-learning is consistent in content and delivery, FTF has so many delivery parameters that past reviewing a presentation file, we have no idea whether what the educator actually delivers is of the quality we would be looking for. While we would not seek to reject a compliant programme, having more independent evaluation of a programme may identify cases where we can work with the NADO to meet what we felt our athlete needs were.

An additional means of informing recognition would help, but it would be important that this would be voluntary and/or designed in such a way as to encourage support, collaboration and development and not create unnecessary competition, or unfairly disadvantage less well-resourced signatories. One idea could be for an ADO to voluntarily submit its learning materials for evaluation, and allow independent in-person assessment of some of its FTF sessions. A small group of education practitioners (led by a WADA chair?) could review a programme and

provide an informative assessment, which could be agreed with the ADO and then shared with other organisations signed up to the voluntary scheme. This may of course be too similar to (and offer little more than) the compliance audit (as ADOs may want the chance to correct a less favourable assessment...). The only other obvious solution would be to extend the WADA compliance audit to include field audits!

As a final general point - there are of course some limitations with such hybrid systems and automatic recognition. Our own system for our IL athletes uses our IF e-learning and NADO-led FTF. However, if a NADO and National Federation agree that they would prefer to use the NADO e-learning and the NADO is Code-compliant then we would accept this (and reserve the right to review it). However, this has an impact on monitoring and evaluation which also needs to be considered. It's much more difficult to have meaningful statistics as an IF when we have countries completing a range of e-learning programmes (our own and NADO ) and each NADO is delivering a different FTF. There's a trade-off between convenience and our ability to effectively review/evaluate.

## ISU

SUBMITTED

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

Flexibility must be given to each of the stakeholder's to assess whether or not to recognize Education Program carried out by other signatories.

The minimum topics to be included in an Education Program could be defined for the recognition process. IFs might have difficulties to assess other Signatories Education Program due to the language barrier. An option could be to encourage the Lead AD Educator, whose Program needs to be recognized, to do the IF Education Program and obtain the Certificate. By doing so, the IF makes sure that the Lead AD Educator has a minimum level of understanding of its Education Program, which could facilitate the recognition.

## National Olympic Committee of the Republic of Kazakhstan

SUBMITTED

Olzhas Togizbayev, Senior manager (Kazakhstan)  
Sport - National Olympic Committee

The National Olympic Committee of the Republic of Kazakhstan having considered the International Standard for Education informs the following. NOC Kazakhstan provides feedback on the Concept #1 of the International Standard for Education.

Thanks to the four components of the international standard for education, it became possible to structure education programs by: type of sport, age, level of sport, including elite sports athletes and youth sport. The implementation of an education program created in accordance with the international standard for education increased the awareness of athletes about anti-doping information in sports.

In accordance with the international standard for education, an educational pool was created consisting of elite sports athletes competing at the international level.

## Botswana Football Association

SUBMITTED

Boago Diphupu, Mr (Botswana)  
Sport - Other

- first aid
- Anti-doping
- health and safety
- substance abuse
- **nutritious meal**

## UEFA

Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

SUBMITTED

Recognition of other ADOs education programmes is extremely challenging to implement. It is difficult to set standards and criteria to evaluate the other signatories' programmes. It would be useful therefore, if WADA provided more guidance on this matter. Potentially, it could be sufficient for recognition if the education is delivered by a Code Compliant ADO.

## USA Track & Field/American College Sports Medicine

Dr Mark Troxler DO MBA FACP FACSM, Chair, Anti-Doping Education Committee/Anti-Doping Interest Group (USA)  
Sport - Other

SUBMITTED

As long as an athlete receives resources that are complete from one Signatory that is compliant by Wada the recognition will be adequate. We want to emphasize complete.

## HADA (HELLENIC ANTIDOPING AGENCY)

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

SUBMITTED

Given the fact that the "recognition" concept may not be fit for purpose, as there may be a misalignment between its intention, its interpretation and its application in the field and concurrently keeping in mind that the ISE is a new IS and hence, the "recognition" concept may need a larger adjustment period, we as an Organization believe that a middle ground solution would be more practical, trustworthy and fruitful. Since the impact/effect of an education activity cannot be easily quantified, a safe measure would be to define the prerequisites and the wherewithal which the educator should bear. By attending the GLDF education training we believe that the level of the training, the interaction, and the variety of documented knowledge any trainee acquires are of the highest standards. Having experienced these engaging sessions, we would unequivocally trust all the coworkers of mine from these trainings to educate any target group -by the end of the program- and we are utterly certain that they would attain all the desired objectives. Therefore, we think that a great way to solve the recognition problem would be to recognise any education program which has been implemented/overseen by a GLDF trained staff.

## Swiss Sport Integrity

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

SUBMITTED

- SSI strongly agrees to review the concept of "Recognition" whether it is currently fit for purpose.
- SSI disagrees to give more "bedding-in" time, practical solutions have been proposed and shall be the preferred path.

## Organizacion Nacional Antidopaje de Uruguay

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

No comment. We find it practical and accurate

## Dopingautoriteit

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

The education program of Doping Authority Netherlands is known as the National Education Program. Our National

Olympic Committee (NOC\*NSF) recognizes this education program and uses it actively for athletes and support personnel in delegations under the NOC\*NSF flag. Coordination in this area is going well.

By contrast, coordination with international federations is proving difficult. We have the impression that many international federations are not actively working on education (or plans in that area). In most cases, when international federations do play an active role, they expect athletes and support personnel to complete e-learning modules from WADA or their own education program. In consultation with the Dutch sports federations, we recognize these options, or we ask the international federation – in order to ease the burden on athletes and support personnel – to recognize our education program. Our efforts in this respect are not always successful.

However, we do think it is important to retain this component in the International Standard for Education (ISE). The ISE was introduced relatively recently and rolling it out takes time, particularly given the corona pandemic since its introduction. In our opinion, it would be very helpful for coordination between the federations if there were to be an overview of the education plans of different signatories.

### Anti-Doping Agency of Serbia

Bojan Vajagic, Director's Assistant (Serbia)  
NADO - NADO

SUBMITTED

The ISE issue Recognition of Education Programs currently not best fit for purpose, since many signatories automatically recognize other education programs without deeper evaluation other signatories' education programs.

Since the ISE is one of the youngest IS, in this stage this issue should be less emphasized.

### JADA

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

"Recognition Program" - We understand its intention (ie. avoiding burden of athletes by duplications, 'education fatigue') and we agree with what stated with "Emerging Challenges", including the following observations we have:

- Although ISE 8.2 says "shall acknowledge the Education Programs", it is currently unclear if ADOs are gaining a full picture of Education Program from other ADOs before recognizing others' program. In practice, some only received the partial information or picture about education activities as part of ADOs' education program, and recognized.
- Before recognition, too much energies are made to understand the full picture of sporting system in one country or sport (thus needs/challenges identified and structure is placed) and their Education Program. Too much energies are also made to obtain information from others to know and understand the details. When you receive the information about Education Program, some are not necessarily unrecognizable (not necessarily one NADO would expect in terms of education objectives) or some just do not go into details but just recognize without asking.
- Process and criteria unclear practically - Some IFs reject/do not recognize one NADO but recognize other NADO's program or activity - it is unclear the reasons. Some NADOs cannot necessarily translate all information into English thus cannot share the full picture of Education Program and the related activities.
- ADOs are too passive for sharing Education Plan (until asked, not share).
- Because your Education Program is Code-compliant, why do we have to recognize?
- 

We suggest the followings:

**a) Recognition terminology itself to delete or change** We should avoid the use of "recognition" term because it is different from what "TUE recognition" does. The terminology does not capture the actual intention (ie. avoid education fatigue; avoiding overlapped education or reach for education) and this does not help for a quality practice.

**b) State more strongly and clearly about:**

i) the mandatory requirement of educating RTP/TP/Other Pool Athletes (Concept 4, 7);ii) the two Principles of ISE - we can possibly clarify ISE 7.2.3 a)ii, iii and ISE 7.3 regarding "educate before testing" and "educate before sending athletes/ASPs for competition"; andiii) the roles and responsibilities of IFs/NADOs/NFs/NOC-NPCs- so that "Recognition" process is not needed (Chapter 7 to revise)

Considering the responsibilities are split depending on the categories of athletes (ILA by IFs; NLA by NADOs) and considering the most significant Education target is placed on RTP/TP/Other Pool Athletes, IFs/NADOs can 'presume' that those Athletes are gone through a MANDATORY education in advance of including RTP/TP/Other Pools (as per ISE requirement/ Code compliance matter if not educated). In this way, this can 'mutually' be understood between IF and NADO - no need to go through 'recognition' process as such.

7.3.1 - it should be rephrased as "shall" rather than "should".7.3.3 - it should be "shall" and rephrased the sentence "Athletes and their Athlete Support Personnel participating at International Events should receive Education in advance of the Event and in accordance with Article 5." Because International Events are identified by IFs, IFs should be mandated to publish, and communicate to NFs, which International Events require prior-event education (this prior-event education activities can be specified either by IFs or shown in Guideline, ie. ADEL and/or NADO-certified/acknowledged Educator). Taking that into account, NADOs must coordinate with NFs at domestic level (--> state much clearly/specifically on this requirement in ISE 7.2.4, 7.3.4) to avoid duplications and better maximise resources.

**c) 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.** ADEL - PowerUser can see their sport/country's learners activities.ADAMS - it can be a consideration to create a tick box next to NLA/ILA box as "Pre-Inclusion Education", then both NADO/IF can be shared to view (in the same way they can mutually see one athlete's inclusion date on ADAMS). Surely, education staff may not necessarily have access to ADAMS, in the ISE and/or in the Guideline, it should mention that the coordination inside the ADO should be happening (which means more coordination inside the organisation). Compared to the "Recognition" process, this would be much feasible and practically done.

#### COCOM

Stephanie Sirjacobs, Legal adviser (Belgium)  
NADO - NADO

SUBMITTED

Si pour les rédacteurs, se limiter à dire qu'on reconnaît automatiquement les programmes éducatifs des autres signataires, pour autant qu'ils ne soient pas déclarés non conformes suffit, on peut ne rien faire et laisser du temps à la notion pour faire son chemin. Il pourrait néanmoins être ajouté dans les commentaires que cette pratique est autorisée et qu'il n'est pas attendu plus des signataires dans ce processus. Ceci permettrait de clarifier la situation et de rassurer certaines parties prenantes.

#### ONAD Communauté française

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

As explained in the concepts document for this Standard, it was introduced in January 2021.

This standard is therefore recent. It is clear that it has led to an increase in the financial and human resources of ADOs.

As a result and consistent with our general remarks on this overall update, this is a key area where a thorough impact assessment should be carried out before or in parallel with any proposed changes.

If new requirements are to be proposed, they should be accompanied by a correlative impact assessment both on financial and human resources.

Without prejudice to this necessary prior impact assessment

- Is this Standard fit for purpose? A priori yes, but this tool remains recent.

- Does it translate into practice as intended? The same: it's too soon to answer.

- Should it be more or less emphasized within the ISE? It's soon to answer, but generally speaking, it is an area and a Standard that must remain flexible.

Should it have increased or decreased requirements? Same answer, the instrument is still too new to be able to be fully evaluated. But again and in general, this Standard is already very detailed and already provides for numerous requirements in an area which must remain flexible. Given this need for flexibility, the trend would in any case not be towards an increase in requirements.

About the first concept in itself :

We share the view that ADOs do not always have the time and/or resources to set up a comprehensive program to recognize the education programs of other signatories.

Also, one possibility in this area would be to provide automatic recognition of education programs that comply with the Code and the Standard of other signatories.

In the opposite case, the athlete would not have followed a compliant education program, he would then have to follow it via Adel or via the program of the competent ADO.

WADA would keep signatories offering a compliant education program up to date. In this way, resources would be better distributed and used, duplication would be avoided and efficiency would be gained.

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

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

SUBMITTED

#### ***Clarification in the ISE between program and activity***

ISE 3.3 states: "Education Program: A collection of Education activities undertaken by a Signatory to achieve the intended learning objectives."

ISE 8.2.1 states: "Signatories shall acknowledge the Education Programs carried out by other Signatories and may recognize the completion of such programs by learners (in their Education Pool) of said program, provided that the program has been delivered as per Article 5."

Suggestion: ISE 8.2.1 should be changed to "...shall acknowledge Education Programs or Education activities...". Often a signatory does not need to recognize the whole program but only an activity (e.g., an eLearning-course). This would take a lot of pressure from the signatories because they would not need to assess the whole program of the other signatory but only recognize one small part of it.

#### ***No "mutual" recognition***

Recognition does not need to be mutual; it is fine if this is a "one way street". If a signatory recognizes an activity or just a program of another signatory, the other signatory does not need to recognize the program or activity of the signatory in return.

#### ***Clarification on responsibility***

There should be a clarification in the ISE (or even in the WADC) that recognition does not mean that the recognizing signatory is responsible for the other signatory's program or activity. If an activity had a wrong or



misleading content that, for example led to an ADRV, it should be clearly stated that that is not the problem of the signatory who recognized the activity.

Also, if a signatory tells another signatory that all the members of a team were educated according to the ISE and it turns out in the course of a possible ADRV that the person who committed the possible ADRV was not educated, it should be clearly stated that it is not the problem of the signatory who trusted that all team members were educated.

This would take a lot of pressure from the signatories who recognize other activities or even programs.

### ***Assessment of skills and knowledge***

Education programs are aiming to achieve not only knowledge but also how to use the knowledge in real life situations. There should 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.

### ***Term of validity***

There could be a recommendation in the ISE (or at least in the guidelines) to recognize an activity for max. 2 years (earlier than 2 years if there is a significant change of the WADC or an International Standard).

### ***Template / Form for Education Plans***

To better assess the education program and activities, the education plans need to be shared. However, since there are no templates, every education plan is different. There should be a template for the education plan which makes it easy to identify the important things because it has the same structure, same format, etc.

In this way, the education plans could also be uploaded on a central platform (e.g. ADEL) and would allow to use of searches, filter options, etc.

#### **RUSADA**

Kristina Coburn, Compliance Manager (Russia)  
NADO - NADO

SUBMITTED

RUSADA proposes to establish universal mechanisms and criteria for recognition of education programs, that should be implemented by IFs and NADOs

#### **NADA India**

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

1.

The concept of 'Recognition' aims to reduce duplication of education efforts and optimize the allocation of resources among anti-doping organizations. However, it seems that the concept may not be entirely fit for purpose in its current form. There are challenges related to the practicality of establishing recognition programs and the differing approaches taken by various Signatories. Many Signatories are automatically recognizing other

programs due to resource constraints, which may not align with the original intention of assessing and recognizing the sufficiency of education programs provided by other Signatories. Therefore, 'Recognition' may need to be re-evaluated and the requirements associated with 'Recognition' may need to be adjusted to make it more feasible for Signatories to participate. This could involve simplifying the recognition process, providing clearer guidelines, or offering alternatives to formal recognition programs, especially for organizations with limited resources.

2.

Therefore, the possible solution for this could be the comprehensive review of the concept of recognition involving input from various signatories, stakeholders, and experts to address the challenges and streamline the process. This may further be improved by developing **standardized guidelines, offering flexible and alternative options and continuous monitoring** by implementing a system for continuous monitoring and evaluation of "Recognition program".

### Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

Recognition of education in anti-doping basically means that the qualifications athletes and ASPs obtain in one country or program are acknowledged and accepted in another country or program. Recognition therefore eases the burden on Athletes and Athlete Support Personnel and minimize duplication of Education and reduce education fatigue (as outlined in the ISE). Furthermore, recognition can also ease the potential language barrier for athletes and ASPs.

Education in one's own language is not only a matter of linguistic proficiency but also an important element in promoting effective communication within a cultural setting that we believe is important for the learning environment.

In Denmark we prepare an individual anti-doping education plan in collaboration with each of our NF's. in continuation of this we have developed a template recognition letter, to try to meet the requests to our NFs from their IF's. In the letter we outline the core content of our program (limited to our online education program). The NF's use this to try to document parts of the educational planning we do together. It is our experience that the vast majority of If's automatically accepts our application, the same way we accept when NF's ask us to recognize education programs provided by their IF's, in cases where they do not recognize our education (or any other ADO's approach to education).

To support our athletes and ASPs in the best possible way we recognize other ADO's programs, but we still encourage our NFs to introduce our national program to provide the athletes with knowledge specific to Danish Sports System and tools that are available when you are active in a Danish setting.

When education programs are recognized, it implies that they meet certain standards of quality. This helps maintain a certain level of consistency and excellence in education. And this is where we meet the biggest challenges. There are no common systems, criteria's, templates, checklists or like that constitute a solid quality check.

It would be our suggestion to implement such guidance. Currently there is a working group in reign of the Council of Europe working with recognition. Their results might be valuable for the further development of guidance within this important area.

### NADA

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

SUBMITTED

In theory, the ISE Article 8.2 is fit for purpose, but does not translate into practice at all. It has been a struggle for ADOs to get International Federations to recognize the Education programme (or parts of it). In order to avoid any



language barrier for Athletes in Anti-Doping Education, it should be easier for NADOs' national Education programmes to be recognized.

Possible additional Article 8.2.2 and 8.2.3.:

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

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

### Drug Free Sport NZ

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

We support the concept of "Recognition" and the intention behind the system in place.

However, in our experience, the practical application is currently too labour intensive. In some examples, we are required to invest significant resource either to prove the quality of our programme for recognition from others, or to review someone else's programme for our recognition. At the same time some ADOs, IFs in particular, appear to recognise some education programmes without review specifically because they do not have the resources to review them properly.

?

We propose two possible potential solutions to this:

■

The first is that WADA reviews programmes and establishes a 'pool' of recognised education programmes, endorsed by WADA if they are ISE compliant so that others do not have to do it.

■

The second (alternate) is that WADA prepares and implements a single universal template for signatories to input all relevant information demonstrating their programme is compliant and should be recognised. This can be shared between signatories who are seeking and recognising recognition requests, allowing for a streamlined and standardised process.

WADA should note that DFSNZ's preference will always be that NZ athletes complete NZ education, due to supplementary information that is specific to New Zealand above and beyond the Code and ISE requirements. However, we understand the ideas and aspirations behind recognition. If recognition were to be provided, we would always look to provide 'kiwi specific' information as an addition that highlights information specific to NZ athletes i.e. Global DRO, Speak Out information etc.?

Finally, we fear for smaller/less-resourced ADOs here and the likelihood that they might get left behind because they do not have resources to review and recognise education programmes.?

### Anti-Doping Norway

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

SUBMITTED

From our understanding the initial intention was to free up resources and to avoid duplication of education. From our perspective and experience, it does not free up resources, as it is more demanding and time-consuming to set up a recognition program than to carry out education for the relevant groups. We believe that this concept is not fit

for purpose, because in our opinion this will cost too much to develop.

?

In addition, it is doubtful whether the aim of avoiding duplication of education is appropriate, as the research is clear that repetition is important for learning and that one-off education measures have marginal effect. We believe that repetitive learning can be positive. While mutual recognition may be relevant from a perspective of credential obtaining education, it is less so from a preventive perspective.

It is important to remember that the time an athlete spends on anti-doping education is still very limited. In our opinion, completing two e-learning programs per year (one from the NADO and one from the IF), will take limited time and energy, while reinforcing the messages. This would only apply to a small number of high-performing athletes completing the program, an ADRV would have great personal and professional implications. We know that for education to work, an athlete must be exposed to the message several times.??

This concept should be less emphasized in ISE or removed completely. Alternatively, we suggest that WADA makes a list of the Education programs that are recognized because it does not translate into practice as intended.

### **Sport Integrity Australia**

SUBMITTED

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

The intention of Recognition as a 'guiding principle' is broadly supported, however there have been significant challenges in implementing this in practice, and a lack of consistency across the sector in how Recognition is sought and implemented. Given this is a new IS, more 'bedding in' time is likely the best course of action, with some potential changes or support, outlined below.

As background to the implementation of Recognition in the Australia context, Sport Integrity Australia (SIA) works with each National Federation to develop an education plan which includes mandatory education for international level athletes (and other cohorts specific to each sport). This can sometimes lead to duplication of effort between IFs and NADOs, which risks education fatigue.

SIA's experience with IFs recognising our education has been mixed. In some instances, IF's have automatically recognised SIA education upon request by us (or an NF). In other instances IFs have reviewed our content and then provided recognition. We have also experienced IFs who have no desire to implement Recognition because it is easier to mandate that all athletes complete the same course (ie ADEL) – each of these is explored in more detail below.

SIA has not proactively sought to recognise IF education to replace SIA education. This is because, as a first principle approach, SIA believes that Australian athletes should receive information specific to the Australian sporting environment they spend their time in – particularly regarding unique threats facing Australian athletes, and tools to reduce inadvertent doping that are only available to Australian athletes (ie the Sport Integrity app, Global Dro, CBD advice, Supplement advice etc). This information would not be included in other Signatories education programs.

This position was supported by the Australian NFs who provided feedback to SIA, who said that Australian athletes felt 'closer' to their NF than to their IF and were more likely to seek anti-doping information from Australian sources than international ones. One NF also noted that CAS often considered the adequacy of athlete education in ADRV hearings, so the quality and relevance of education was important.

SIA has supported Recognition requests that have come from National Federations for athletes who compete/reside overseas for the majority of their athletic careers – i.e. where athletes competing in Australian competitions live in NZ SIA has recognised Drug Free Sport New Zealand (DFSNZ) education (after reviewing their content/programs).

When SIA becomes aware from an NF that an IF has set mandatory requirements for Australian athletes (ie to

complete their own IF course, or to complete ADEL), SIA has sought Recognition for SIA education completions with mixed results. Some IFs have strong engagement, and recognise SIA education and we work comfortably with them in this space.

In other instances, SIA has found that some IFs were unwilling to Recognise SIA education (or any NADO/RADO education).

For a handful of athletes in this scenario, we have recognised IF education completions in lieu of Australian completions as we were hesitant to make athletes do two online courses. We agreed in part because we were able to also provide Australian-specific face-to-face education to these athletes, and/or because we would reach them through our 'Annual Update' online course in the following years.

Some NFs in Australia also have their own online anti-doping courses (reviewed/recognised by SIA) which IFs may also choose to Recognise since they combine country specific and sport specific education, which SIA supports.

In our experience, it appears that there has been more demand from International Federations to seek Recognition from NADOs to ensure their athletes are educated, than there is for NADOs to seek Recognition from IF education to replace their own international athlete education program. Given the fluidity of athlete pathways over the course of their careers (i.e. they may be international level sometimes, and national level others), it would be problematic if NADOs only supported national level athletes and below, so SIA will always continue to educate international-level athletes.

SIA's view is that the cultural specifics of the athlete's primary nation of residence and competition could be prioritised above other factors, and are generally preferable to IF courses (or ADEL) which seek to educate broader communities (not withstanding some excellent resources and programs being produced). This is especially true if SIA is unable to reach a cohort through face-to-face education.

However where an IF has a well developed online course that is specific to their sport, we are happy to recognise the completion of sport-specific online training, especially when supported by Australian-specific F2F training.

Guidance from the ISE as to how to ensure athletes receive the 'most appropriate' online education through any Recognition program could assist. If there was agreement across ADOs as to whether sport-specific or region-specific education was preferable, and whose education could take precedence, this could go into such guidance. This could possibly be done in a way similar to the TUE Standards, which provide guidance on 'default custodianship'.

Finally, in SIA's experience, the majority of all Recognition requests focus on online education completions, which can be seen as stagnant and burdensome, as opposed to face-to-face education, where content can be adjusted and tailored each time it is delivered, reducing the risk of education fatigue. If this is the case worldwide, the Drafting Committee could consider restricting Recognition to online completions only. Online education is also significantly easier to review/monitor than F2F education.

In addition, it would be helpful if WADA (or another body) could collate a list of ADOs that offer online education course (outside of ADEL) for the visibility of all stakeholders. Any support from WADA (or a Taskforce) to review online courses and 'Recognise' them (with notes for IFs/NADOs to consider) would be gratefully received in this space to reduce effort on all ADOs.

One stakeholder consulted in this feedback also suggested that CISP could provide further resources such as an 'equivalency check' – a template that organisations share to identify duplication, or where gaps exist. The equivalency check could cover things like which target groups are targeted, what topics are being covered, what assessment/monitoring is in place etc.

**Canadian Centre for Ethics in Sport**

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

Recognition, as a concept, is strong, however, its implementation has been challenging for some Signatories and their interpretation of recognition has created burdensome loads.

Barriers to translation into practice include:

- **Overlapping education pools.** NADOs may communicate their requirements to national federations, which then receive different requirements for subsets of the same athletes from IFs.
- **Asymmetrical expectations of an education program.** NADOs may have different requirements than IFs, which can create confusion when those requirements are not communicated to all parties.
- **Poor or late communication of requirements from IFs to national federations.** The CCES has observed IFs implementing education requirements on their national federations, who have no educators and are not authorities in the field, without providing access to anti-doping education themselves. National federations are reliant on NADOs for anti-doping education and while it's encouraging to see IFs take a more direct role in encouraging education of international-level athletes, communicating requirements to national federations under their jurisdiction in a clear and timely manner is essential to ensure that activities delivered are more than "ticking a box."

Recognition should have more specific requirements. Code-compliance, confirmed by a successful WADA audit, should be all that are required for a Signatory's education program to be recognized by other Signatories. The ISE could set that requirement, *making recognition a default state for compliant signatories* in global anti-doping education.

Similarly, there may be room in Section 7 to define which Signatories' education requirements should take precedence. Per 7.2.1, the authority of NADOs, the scope of their domestic programs, and the fact that many international-level athletes will have domestic requirements *first* (e.g. TUEs, education) should be considered by IFs when they develop their education plans.

More, and clearer, understanding of what Signatories find burdensome about Recognition would help assess this more fulsomely, and may encourage Signatories to reflect on their approach and reassess how well their current recognition process fits the System Assessment (4.2.1) and Resources (4.2.3) as identified in their Education Plan. **Article 8.2 does not definitionally force Signatories to take on burdensome administrative loads**, and this should be emphasized in any reassessment of the value of Recognition.

The concept paper muses about the value of a "bedding-in" period for the concept of "Recognition." It is worth stressing that at time of writing, the ISE is **only two years old**. *Most* of its concepts are in a period of bedding-in and trial. Recognition is, all the same, identified as a particularly challenging pain point. Focused consultation on what those challenges are, and clear communication of the results of that consultation to Signatories who have not shared that experience, would help align Signatories' understanding with the problems faced by their peers and make any feedback and contributions stronger. It may be appropriate to make no change at this time, but instead to work to standardize Signatories' understanding of what is and is not necessary per the ISE.

## UK Anti-Doping

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

SUBMITTED

▪

This is something we should be striving for, to deliver an athlete centred learning experience.

▪

Refinement with the terminology is required as the ISE refers to recognition of "programs", which is broader than an individual education intervention, therefore clarity needed on whether signatories are recognising an entire

ADO program or a component of such a program required for a Major Games for example.

■

Agree it can be time consuming but should only need to be completed once formally with a review opportunity during the course of the Code validation period, to assess if the recognition process is still valid

■

Recognition can be a challenge for us as a NADO as we have additional detail to the topics that we require athletes to complete over and above the WADA ADEL education offering, which is culture and context specific. It can feel quite disjointed for athletes in terms of accessing several learning platforms e.g. WADA ADEL & NADO eLearning platform but ensures that there is no duplication on behalf of the learner.

■

There are challenges to recognise other education interventions and assume compliance with the Code (in terms of topic coverage) when specific mandatory education interventions that are not compliant with the 2021 Code and is without full coverage of all required Anti-Doping topics – the athlete is affected as they will need to complete significantly more education than is necessary.

■

Although the current recognition principle appears to not be fulfilling its original purpose, there is a requirement for some guidance in the area due to the dual jurisdictional issues.

■

WADA ADEL courses are used significantly as part of our recognition/equivalency checking process, e.g. in advance of an Olympic or Paralympic Games. A potential solution could be a recognition template to map signatories learning interventions, in effect a standardised equivalency assessment.

## USADA

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

SUBMITTED

**Recognition of Education Programs to reduce the burden on athletes is broadly supported by USADA, however, the guidance around this concept is unclear. Recognition programs as a concept have created significant challenges for signatories, as there is a lack of consistency about how to recognize education programs, and additional confusion exists for athletes, athlete support personnel, and ADOs. In addition to the challenge, it also fails to recognize that many countries have tools specific to their athletes, taking into account cultural factors, and country specific resources. By encouraging recognition, without a clear path forward, it weakens the education that is available to athletes and athlete support personnel.**

**Since the creation of the ISE, we have seen more overlap and duplication of education efforts rather than less. For example, the IFs are now required to work with their federations to add in more education, many of whom don't recognize the NADO's education, and if they do require significant reporting, it could increase the administrative workload on the NADO. The intent is good, but more guidance needs to be provided.**

**Currently, USADA has provided evidence of education for US athletes but has not recognized other programs.**

**One final thought here is that if there is not an annual, proactive approach for mutual recognition, it impacts our ability to achieve our education plan objectives. We find that often, mutual recognition is only considered in the 11th hour, days before an event. A process in which mutual recognition is established in advance is necessary.**

### **Agence française de lutte contre le dopage**

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

SUBMITTED

Le raisonnement derrière le concept de « reconnaissance des programmes d'éducation », qui vise à réduire au minimum la duplication des efforts d'éducation et éviter aux sportifs des doublons inutiles, est tout à fait valable.

En revanche, ce concept se traduit difficilement dans la pratique : les modalités de mise en œuvre ne sont pas clairement définies (et peuvent difficilement l'être), et la démarche en elle-même peut s'avérer chronophage pour les OAD et solliciter beaucoup de ressources. S'ajoutent à cela des différences d'interprétation et de mise en application.

Aussi, dans la mesure où l'AMA considère qu'une OAD est conforme au Code (et au SIE), le concept de « reconnaissance des programmes d'éducation » demeure-t-il pertinent ?

### **Caribbean Regional Anti-Doping Organization**

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

SUBMITTED

While the management of the 'recognition' concept poses some challenges, its application is relevant and should be maintained at this stage to avoid duplication of education initiatives and potential information fatigue for athletes who may be repeatedly exposed to the same information from different bodies (IF, NF, NOC, NADO) due to their level competition level.

Further consideration should also be given to how some programmes might be viewed as 'inherently better' than others simply due to the name/nature/geographic location of the organisation providing the education rather than an assessment of the content and/or deliver mode used.

### **Caribbean Regional Anti-Doping Organization**

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

SUBMITTED

The original intent of mutual recognition is to ensure that there is minimal duplication in athlete education. If there is a mechanism to ensure ADOs are meeting the requirements of ISE Article 5 in relation to their RTP and Education Pool athletes, captured in ADEL or other database/platform, perhaps it can alleviate the challenges of setting up recognition programmes so that organisations spend more time capturing athletes who may not have had any education training.

The concept of recognition seems fit for purpose if held to the original standard and removing the requirement to set up recognition programmes. Additionally, perhaps the 2027 goal is to ensure organizations communicate with, and not police, each other in this regard.

### **SEARADO**

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

SUBMITTED

The standard need to be clearer with regards to mutually recognized programs. The key elements that need to be clearly indicated to mutually recognized. Maybe, a verifying body to endorse it.



## University of Birmingham

SUBMITTED

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

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

The real benefit of adopting the ISE that all interviewed organisations referred to, was the structure and consistent language it brought. Another benefit some described was how the ISE was used as leverage for additional funding. Despite this overall positive reception, the majority of the education managers we interviewed expressed that their organisation had already implemented practices similar to those mandated by the ISE prior to its enactment (exemplar quotes: "What we probably needed in place, was already in place"; "For us it wasn't a struggle but a smooth transition... 85% of what is in the ISE, we were already implementing"; "What was going on before was close to what was expected... ISE was affirmation". These organisations appeared to have followed an adoption strategy, wherein existing operational frameworks were aligned with the ISE requirements rather than fully embracing the ISE and its underlying objectives. This meant that changes in delivery were not deemed necessary and potentially beneficial changes were not made. This retrofitting process sometimes aimed to identify and address any discrepancies and was reflective of the compliance mindset we expand upon later in the other comments/suggestions section. This approach was not reflective of the way all organisations had implemented the ISE though, and two education managers described how their organisation had started from what the ISE required and built their respective programmes from there. To help encourage organisations to adopt similar approaches in the future, we would recommend the inclusion of ways to formally recognise education programmes that fully embrace the ISE and capitalise on its underlying objectives to the benefit of education delivery within their regions.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

We fully agree and support the further development and refinement of the concept of recognition of education programs amongst ADOs.

We would recommend prioritizing the focus on streamlining practical implementation through clear guidance and best practices. While recognition is a valuable tool for fostering synergies and operational efficiencies, there seems to be a need for additional guidance to ensure its effective and efficient application, especially considering that each ADO independently manages the recognition process.

In relation to ISE Article 8.2, linking recognition to compliance with ISE Article 5 may introduce reservations in the practical application. ADOs should not be tasked with confirming or second-guessing the compliance of another ADO's education activities. We propose reconsidering or removing the reference to Article 5. Recognition is not meant for monitoring or enforcing compliance but for aligning objectives among ADOs and relieving athletes of unnecessary burdens when similar objectives are achieved through equivalent education programs. The wording could therefore underscore aligning purposes and content as the primary focus of recognition by another ADO, rather than compliance with the ISE requirements (which would anyway remain intrinsic in any evaluation).

Furthermore, we would recommend providing additional guidance to ADOs, either by expanding the International Standards for Education (ISE) Guidelines or by creating a dedicated document. This document could incorporate for instance a template for streamlining and simplifying administrative processes and records related to the recognition of education programs. Offering specific guidance on parameters and indicators during the recognition process would contribute to improved clarity and consistency across ADOs. Finally, a centralized database of recognitions (for instance leveraging ADEL, where possible) would help foster transparency.

## Aston University

SUBMITTED

Kris Lines, Senior Lecturer (UK)

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

There may be a risk of duplication here which a more harmonised system of accreditation might resolve? If a framework was implemented to establish minimum competencies akin to the quality assurance (QA) system that already exists in many educational establishments eg EQUIS / Triple Crown / AMBA etc, then this may reduce

some of the oversight requirements. There would also then be a greater confidence that the educational competencies were being met. The annual running costs of this accreditation / QA system could be met through organisations wishing to benchmark themselves against this system.

## Concept #2 – Educators (34)

### International Taekwon-Do Federation ITF Vienna

SUBMITTED

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

I totally agree that educators must have a certain standard in planning, implementing, and evaluating education sessions and programs, this can be done through online training programs and other educational materials.

### FEI

SUBMITTED

Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)  
Sport - IF – Summer Olympic

There should be a training curriculum for educators, also including generic considerations such as:- the soft skills necessary for the role - how to create a respectful and "safe" learning environment. This was touched on in WADA's pilot course for the GLDF ADO Practitioners and I found it useful.

### World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)  
Sport - IF – Summer Olympic

We would support the introduction of tighter/more specific guidelines for educators, particularly with regards to how often they are audited (and by whom) and how many FTF sessions they complete per year. A standardised knowledge exam (of the kind that WADA and the Council of Europe Education group have been working on) may also assist with this.

We would also suggest looking at how field audits could be incorporated into these competencies (or even WADA compliance) process. If this could not be a mandatory part of the compliance assessment (given it would be resource heavy and would need specific compliance parameters to be in the ISE – which may be too complex) it could perhaps be voluntary and encouraged via reciprocal agreements between ADOs. The current desk/paper audits of what is essentially a field-based activity (in relation to FTF education) have significant limitations, and as with the other large field staff group DCOs, ADOs can effectively mark their own homework. From our experience (as a larger IF working with worldwide NADOs), we witness a range of DCOs and though we don't get the chance to see educators in the same way, it can be reasonably assumed that educators worldwide will vary to a similar degree, and more needs to be done to support those who need it to support/develop their staff.

We therefore agree with the proposal that a demonstration of knowledge and competencies would be a useful addition to the ISE but it would be helpful for this to be an independent process as much as possible. An independent (WADA?) recognised assessment would solve half of this problem, and also useful would be a minimum requirement for the number of education sessions conducted per year. Standardising teaching/delivery skills may be outside the scope of what we can do with the ISE alone, but guidance/recommendations could still be provided.

### ISU

SUBMITTED

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

### IBSA - Virtus - World Abilitysport

SUBMITTED

Mohy Eldin Elgaafary, TUE Committe member (Egypt)  
Sport - IPC

As prohibited list consider the backbone of anti-doping, i suggest to be obligatory to include at least a pharmacist in each education team in each anti-doping organization

### **Botswana Football Association**

SUBMITTED

Boago Diphupu, Mr (Botswana)  
Sport - Other

- School teachers
- coaches
- parents

### **UEFA**

SUBMITTED

Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

Additional mandatory competencies for educators could be outlined in the ISE (communication skills, classroom management, ability to engage adult & youth learners etc). We would however, have concerns if minimum requirements on training/assessment of educators was introduced. ADO training may not be available in all countries and preventing extremely able educators, (such as team doctors) from speaking to athletes may have negative impacts.

### **USA Track & Field/American College Sports Medicine**

SUBMITTED

Dr Mark Troxler DO MBA FACP FACSM, Chair, Anti-Doping Education Committee/Anti-Doping Interest Group (USA)  
Sport - Other

We agree that knowledge and competencies are an important measure of educators competencies. The audience of the educator is also an important factor, i.e. athlete, coach or athlete support personnel.

### **Swiss Sport Integrity**

SUBMITTED

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

- SSI partly agrees with the concept of competencies. While SSI fully agrees to require the educators to demonstrate their implementing competencies, the evaluation is done independently by the University of Berne, following the principle of good governance. Hence, the focus should be on the delivery, the implementation of education.
- SSI fully agrees to consider a wider umbrella of professionals.

### **HADA (HELLENIC ANTIDOPING AGENCY)**

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

Despite this being a more vague concept than others, we consider that the definition, role and prerequisites of an educator, must be framed in a more clear manner so that they are completely perceivable by every stakeholder. At this point, there is a fog regarding the wherewithal an educator should bear/exhibit throughout planning, implementing and monitoring/evaluating education activities and programs. Should this become more comprehensible to every stakeholder, the average standards of the education community would increase and subsequently the education provision level would too.

### **Organizacion Nacional Antidopaje de Uruguay**

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

We consider it important. We Support Program Recognitions

### **SLOADO**

Nina Makuc, education coordinator (Slovenija)  
NADO - NADO

SUBMITTED

Annex in the ISE – similar to Annex G of ISTI – Educators requirements

There is a well-established system for Sample Collection Personnel (from requirements to training and accreditation)– it could be adapted and used for educators.

Supporting documents should be prepared and available in CIPS resources on ADEL – Guidelines for educators, educators training workshop agenda, educators' position descriptor.

### **Dopingautoriteit**

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

Doping Authority Netherlands recruits and trains educators at its own discretion. A clearer framework in terms of competences and knowledge is certainly desirable. However, the large differences between signatories should be taken into account here. A signatory in a small country may have one part-time educator, responsible for the entire education process, from setting up an education plan to organizing and delivering education sessions. A larger signatory, by contrast, may spread the education work between several employees. So the answer to the question 'what does an educator do?' is likely to vary widely from one signatory to another.

### **Anti-Doping Agency of Serbia**

Bojan Vajagic, Director's Assistant (Serbia)  
NADO - NADO

SUBMITTED

One of the most important concepts that the ISE should have is level of education and experience background of educators.

This concept should be more emphasized within the ISE, with increased requirements.

### **JADA**

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

Educators We are hoping to strengthen the status of ADOs regarding Educators.

Because it had been perceived that "Education can be done by everyone or anyone" because ISE did not exist or requirement as deliver was unclear, Educator definition and concept has been such a significance. In order to avoid some strong perception that anti-doping or anti-doping education is a medical professionals' field, the Code Article 18 and ISE can strongly mention that it is the professional area and Educators have a huge influence on a quality face-to-face Educaiton.

To maintain the quality/standards of "face-to-face Education" globally and to promote a quality education, it is important to set a minimum standard of competencies required as Eduactor in the updated ISE, including the followings:

- "be competent in Values-Based Education and on all topics (ISE 5.8)" must be maintained (be competent in Values-Based Education is VERY important to keep for ensuring Values-Based Education is happening). Educator

should be able to focus on youth-level athletes for Values-Based Education.

- Education is a professional area (we need to avoid anti-doping as medical or pharmacological field; still as perception in the field), thus competencies from educational perspectives must be stated in ISE, including the knowledge and skills of education (Pedagogy/Andragogy; skills to apply educational approach), skills to set learning objectives, plan a lesson (by writing/setting a lesson plan) and appropriate choice of materials (appropriate for each target groups) etc. Code Article 18 mentions about the introduction of Educator in comparison with a long-standing DCO, that part can possibly revise and make stronger sentence regarding the competencies from education perspective.

- The minimum level of shared completion of training program on Anti-Doping Knowledge can be stated in the ISE - like, completion of ADEL ILA course.

- In Guideline, it practically helps to identify more specifically how training programme looks like, including how to differentiate the pedagogical approach depending on target group, how to write lesson plan etc.

- Very useful to mention about "monitoring of Educator" as ADOs' requirement and responsibility in order to maintain their quality. Some Educators seem to feel that they can do 'anything' as far as they are certified by ADOs, unfortunately. They need to be working along with what or within the remit of ADOs allowed to do, thus this element of monitoring the Educators' performance by ADOs can be mentioned in ISE. Also, by monitoring and giving feedback by mentors (like by ADOs' staff or collaborated education expert), Educators can continuously be developed and maintained their quality. - possibly to revise ISE 5.8

- The desired minimum level of practical experiences in the file within the set period of certification/accreditation can be stated in the ISE - like minim 2 times a year for face-to-face session to re-accredited (as ISTI requirement for DCO).

## ONAD Communauté française

Julien Magotteaux, juriste (Belgique)

NADO - NADO

SUBMITTED

Currently, in practice, most educators work within ADOs. Their experience and expertise is a combination of knowledge and experience in the field.

Also, it would be unfair and probably unnecessary to now require them to complete additional formal training, as their training has been carried out on the field.

We can think about the question for the future, for the new educators, but not for those who are already in the field today.

On the other hand, we agree to allow already active educators who wish to do so, to complete their training if necessary, in particular on the form ( in relation to the educational approach and/or according to the public) but no new requirements concerning them.

Also, about :

- The requirements for educators to demonstrate particular knowledge and competencies as part of their role in planning, implementing, and evaluating education session and programs, we refer to our previous general remark on this subject.

There should be no additional requirements for current educators, who have been trained in the field.

Alternatively, it would be appropriate to provide for a transitional rule according to which educators who work in the field since 2021 are presumed to have the skills, competencies and appropriate knowledge.

For the future, from 2027, it can be a good idea, as long as the criteria remain broad and do not require the use of educators in the sense of professor or who have undergone such training. If educational activities require certain skills, it is not necessary to have real "teachers" to provide training, especially since the audience is very large. The diversity of the public should also be taken into account. We are aimed at young people, doctors, people with or without an educational background, etc. If it is necessary to ensure that the people who carry out the training have a good knowledge of the fight against doping, the professional training that they should follow should be left to the discretion of the signatories.

If necessary, WADA should offer or even provide this type of training itself. This would make it possible to standardize and provide essential knowledge in a uniform manner in this area, and thus relieve the burden on the NADOs. Additionally, WADA should consider creating a module on ADEL or a syllabus model document that could be provided to the learner educator. Or at least, the documents that must be mastered by new apprentice educators.

- A wider umbrella of professionals working within the education sector that may need to be considered in order to have their role acknowledged and/or described (e.g., facilitators, trainers, ambassadors, athlete educators, etc), it could be considered.

However, the key is to remain flexible and not to add additional requirements. We refer to our general remark on this standard according to which any new proposal in this area should be accompanied by an impact assessment on the financial and human resources of the signatories.

In addition, it would also be interesting and even necessary to be able to first have an evaluation of the implementation of the 2021 Standard before considering possible modifications.

#### **RUSADA**

Kristina Coburn, Compliance Manager (Russia)  
NADO - NADO

SUBMITTED

RUSADA considers it useful to broaden the notion of educators and add variety to the categories of educators.

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

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

SUBMITTED

#### ***Trained educators at national federation education***

The requirement to have educators who are trained properly is easier to achieve for signatories in their own program. It is more complex to follow this obligation when working together with national federations.

We don't have problems anymore because we have implemented this provision into the Austrian Federal Anti-Doping Act and now the national federations are only allowed to use educators accredited by us to fulfill the obligations of their education plan (that was developed in coordination with us). But before this obligation – and from what we are hearing from other colleagues – some federations educated with their own stuff or experts they knew, but they had no accreditation or sufficient training.

Since the national federations are not signatories, the responsibility to ensure this provision is through the international federations. ISE 7.3.4 states that international federations shall require national federations to conduct education in cooperation with the applicable NADO as per WADC 20.3.13. However, the obligation to use only trained educators is not explicitly there.



The suggestion is to state that the education delivery of a national federation must be done by trained educators. Otherwise these programs cannot be recognized by the international federation or NADO.

### ***Trained educators at school education***

An even more complex situation is the education delivery in schools. Although it is a priority for many ADOs, delivery of education is not always done by trained educators. NADA Austria's educators deliver education in 40 elite sport schools, soccer and ice hockey academies, but on a lower level we are only sending our educators on demand. From what we are hearing, many ADOs don't even have the resources to train teachers or other persons to serve as trained educators in schools.

We think this will be an issue that is hard to solve because stating that all education in schools needs to be done by trained educators would be great, but this is far from the reality. At this point, we don't really have a solution for this but wanted to raise the point for further discussion.

### ***Educator training as part of the GLDF framework***

It would be great if there was an educator (not only education managers) training in the GLDF Framework at some point in the future. We understand that the "field work"-employees (DCOs, Educators) are not the highest priority in the current phase, but these employees are – in our opinion – very important since they are in direct contact with the athletes and ASP and are the "face" of the ADOs.

They should receive proper training and it would be great if there is some kind of streamlined education. As a first step, a role descriptor and a professional (occupational) standard would help, even if there is no training within the GLDF in the near future.

### ***Distinction between educators and education managers***

There is no definition of an education manager in the ISE. In the guidelines there is a mixture between the roles and responsibilities of an educator and an education manager. The ISE states that an educator is a "person who has been trained to deliver Education and is authorized by a Signatory for this purpose". And it states that "Signatories shall assign Educators who will be responsible for delivering face-to-face Education."

Sometimes educator and education manager are the same person, but there needs to be a clear distinction. The GLDF professional standard for an education manager (also called "education role" and "education professional" at different occasions) states that this is a person whose role is to "provide an education program to enable athletes, their support personnel, and other target groups to make informed decisions and act in accordance with anti-doping rules and the values of clean sport." This is probably too broad for an ISE definition, but the primary functions of this role might be a good source to find a clear description.

The suggestion is to have an ISE definition of an Education Manager and to review the ISE guideline accordingly to have a clear distinction between education manager and educator role.

## **COCOM**

Stephanie Sirjacobs, Legal adviser (Belgium)  
NADO - NADO

SUBMITTED

Bonne idée, pour autant que les critères restent larges et n'imposent pas le recours à des éducateurs au sens de professeur ou ayant suivi une telle formation. Si les activités d'éducation supposent certaines skills, il n'est pas nécessaire d'avoir des vrais "teachers" pour dispenser les formations et ce d'autant plus que le public est très large. La diversité du public devrait aussi être prise en compte. On s'adresse à des jeunes, à des médecins, à des personnes avec un parcours scolaire ou pas, etc. S'il faut s'assurer que les personnes qui font les formations ont une bonne connaissance de la lutte contre le dopage, la formation professionnelle qu'ils devraient suivre devraient être laissés à la discrétion des signataires.

Le cas échéant, l'AMA pourrait proposer voire dispenser elle-même ce genre de formation. Cela permettrait d'uniformiser et de donner les connaissances essentielles de manière uniforme en la matière et décharger ainsi les Signataires. En outre, l'AMA devrait envisager la création d'un module sur ADEL ou d'un document type syllabus qui pourrait être fourni à l'apprenant éducateur. Ou du moins, les documents qui doivent être maîtrisés par les nouveaux éducateurs en apprentissage. Pour que ce soit plus clair et uniformisé entre les différents Signataires.

### **NADA India**

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

1. The concept of defining and setting expectations for "Educators" within anti-doping education programs is undoubtedly fit for purpose. Education in the field of anti-doping is a specialized area that requires qualified and competent professionals to deliver effective training.
2. The concept of "Educators" and their qualifications could be clarified further in the ISE by providing clarity and specificity regarding the qualifications and competencies expected of educators. Defining the nature and scope of an educator's role and considering other professionals in the education sector, such as facilitators and trainers, is also a valuable consideration to ensure comprehensive education programs.

### **Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

Education is a profession. And it is obvious that when an ADO employ or assign educators they should be trained and assigned by their employer. In the Guidelines for the International Standard for Education, section 4 there is a thorough description and guidance on recruiting, training, and authorizing educators. In Denmark we have used the guidelines to develop our program for "education guides" equivalent to educators.

In our program we invite people from our NF's, Municipalities etc. who have shown interest in – and often already provide – guidance on anti-doping within their environment. We believe that by training, monitoring, and authorizing this group we support and strengthen the work they already do. We also believe this group will add value to our program which today consists of 2 staff members in our NADO.

We do believe that it is important to look at what competencies an educator shall have, but also what role they are expected to fulfil, and what knowledge that will be sufficient within their scope.

We believe that it will be outside the scope of the ISE to mandating demonstration of competencies as part of the accreditation, re-accreditations, and training framework, because it potentially can narrow the basis for recruitment depending on the model used locally. But we do support that the guidelines encourage ADOs to focus on educators' competencies. Compared to the detailed Guidelines for Sample Collection Personnel[1] the ISE guidelines possibly could be more detailed and comprehensive to support ADOs even more on this topic.

We would also like to discuss whether it is within the scope of the ISE that ADO staff needs to be acknowledged for their competencies? We believe that staff hired for education within an ADO automatically can be expected to possess the relevant competencies. That said we acknowledge that less resourced ADO's might not have Subject Matter Experts within all areas of the anti-doping work. We believe it will be more fruitful to encourage and guide them to a better understanding of recruiting than demanding this. And secondly to whom should ADO's report that their educators possess the relevant competencies?

[1] [https://www.wada-ama.org/sites/default/files/2023-03/isti\\_sample\\_collection\\_personnel\\_guidelines\\_dec\\_2022\\_final\\_en\\_clean.pdf](https://www.wada-ama.org/sites/default/files/2023-03/isti_sample_collection_personnel_guidelines_dec_2022_final_en_clean.pdf)

**NADA**

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

SUBMITTED

The description of Article 5.8 regarding the role of Educators does not translate into practice as it is too loose and not strict enough. The trainings, contents and methods should be more emphasized within the ISE. It would help ADOs to describe more in detail what shall be part of the training. We recommend to not define the background of the educator, as the most important requirement (value of clean sports) are independent of that. If the education staff that organizes the training sessions of the educators are missing specific experiences (educational methods i.e.), they can work together with professional agencies.

Possible additional Article 5.8.1 and 5.8.2:5.8.1 "The competencies of Educators shall include (...)"  
5.8.2 "Signatories shall train Educators at least once per calendar year in a face-to-face session."

**Drug Free Sport NZ**

SALLY LOWE, Education Manager (New Zealand)

NADO - NADO

SUBMITTED

We strongly disagree with introducing a 'one-size-fits-all' model to Educators. We agree that Education is a technical profession that requires knowledge and skills related to pedagogical and andragogical methods, and these need to be represented within an ADO's Education team, but disagree that these need to be represented within the educators themselves.

Prescribing the competencies for educators would not cater to different organisational structures. In the NZ context, our education planning, monitoring and evaluation is designed by our in-house Education Team and it is then delivered by a separate team of Athlete Educators (educators). While we train our Athlete Educators to deliver content, they aren't responsible for its planning or monitoring and do minimal evaluation (only implement).

The drafting proposal also mentions focusing on the wider education team and staff and their competencies and we think a list of desired competencies could be beneficial. Again, we believe being too prescriptive on this does not cater to the many different structures that exist.

Our concern of over-mandated/prescriptive education background and competency requirements would result in doing the opposite of what we are trying to achieve in the work we have done with our Athlete Educators and the lived experience they bring.

Again, we foresee difficulties for smaller/less-resourced ADOs here.?

**Anti-Doping Norway**

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)

NADO - NADO

SUBMITTED

Securing that the educators have the appropriate skills is important. And it is most important to secure the knowledge and skills of those who work in-field as lecturers /speakers/educators. But it is also important to keep in mind that the skills required to deliver, may differ depending on cultural factors and context, including the target audience.??

As an example – creating an anti-doping culture and non-dopogenic environment may require different skills and knowledge, than the ability to communicate and transfer anti-doping knowledge. There are differences between education theory and prevention theory.?

Education theory and "teacher competences" are not a guarantee that one will be able to meet the needs to prevent doping. Neither is requiring Values-based education (5.8).??

We believe that "extensive knowledge in teaching methods" can be a limiting requirement, with the risk of defining

an educator so narrow that it becomes limiting for the preventative activity that should be carried out in different countries and cultures.?

The standard should have less focus on teacher competences and rather emphasize the importance of each organization making an assessment of which competence is most relevant and effective in their context to reach their prevention and educational goals.

### **Sport Integrity Australia**

SUBMITTED

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

Sport Integrity Australia is supportive of mandating demonstration of competencies as part the accreditation process for new educators. This aligns with the accreditation, re-accreditations and training framework we have put in place for all educators. This framework focuses on a theory training period, before a three-stage approach to accreditation; observation, co-presenting and assessment. All stages have structural evaluation and feedback opportunities built in.

In the Australian context, it would not be necessary to acknowledge the difference between facilitators, trainers and athlete educators as there is no distinction between these roles however an acknowledgement of ambassador expectations could be beneficial, including guidance on how these could be selected/trained/used.

It would also be helpful for the ISE to provide guidance for ADO staff who present education. For example – we do not require our permanent education staff members to undergo the formal accreditation process, nor do we require SMEs (eg Director Testing) if we are using them in presentations to answer questions with other educators. ADO staff could receive automatic accreditation (noting that they would only be selected to present on information within their expertise, and if SIA believed they met core educator competencies regarding being engaging, concise presenters). This would be important to address for all ADOs, especially ADOs who may not have capacity to engage external educators.

A GLDF program for educators could assist in this area.

If included in the ISE, emphasis could be given on why the requirement for educators to demonstrate knowledge etc is important i.e., it will support quality assurance of what (content) and how (facilitation) of the educator.

### **Canadian Centre for Ethics in Sport**

SUBMITTED

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

Having a defined role for Educators within the ISE is useful; its definition, however, leaves room for improvement.

Saying that a role requires competencies without defining what those competencies means little alignment between Signatories. The CCES supports the drafting team's effort to describe what those competencies and knowledge might entail.

Educators' requirements must be further explored and explained. More specific requirements, establishing a minimum standard, should be established.

The current requirements should be assessed, as well. Who, specifically, are Educators? Is this ADO staff who run a program? Frontline educators who work directly with athletes? Staff with national federations who receive supplemental training to deliver education? The answer will greatly affect the requirements that are specified. For example, ADO staff developing an Education Program need to be well-versed in the material in the Guidelines in order to run the program, but a frontline educator does not need to be able to develop curriculum or do program evaluation.

For consideration, three separate roles that could be considered for different sets of competencies would include:

- Those running education programs (i.e., a Signatory's staff),
- Frontline educators (i.e., staff or volunteers delivering key activities developed by a Signatory on behalf of that Signatory), and

- Third-party educators (e.g. national federations staff who have received training from a Signatory to conduct additional education activities, athlete ambassadors who communicate with their peers, medical practitioners who have undergone additional professional development to deliver clean sport messaging or support specific anti-doping needs, etc.).

Consulting with Signatories about what types of roles are currently doing education work would help clarify a) how to define Educators who have the requirements as defined in article 5.8, and b) what other roles exist in anti-doping education that might require standardized competencies.

## UK Anti-Doping

SUBMITTED

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

■

As a NADO [UKAD] we define the competencies required to become (& remain) an Accredited Educator. Any additional guidance would allow us to quality assure against international guidelines to maintain our high standards.

■

The 2027 ISE should include reference to ongoing competency requirements for Educators (beyond initial training), as per the recommendation, and where possible for consistency across signatories define the duration of accreditation, i.e. annual, 2 yearly or longer renewal process. Observations, co-delivery etc.

■

The quality of Educators is a critical component of the clean sport education landscape. By providing more prescriptive information, this should drive up standards, however, it should be noted that Educator training may need to be revised and extended if the gap between current and 'required' skillset and knowledge is significant.

■

Additional guidance for other roles would be welcomed. There is currently no guidance or criteria for other roles that impact on Education delivery, i.e., Ambassadors, Trainers – this would enable for consistency in roles and responsibilities (remit), knowledge, skills, qualifications, experience, etc.

■

WADA approval/recognition process would also be welcomed of a signatories Educator training program – to instil confidence if educators are being used at a Major Games by a MEO.

## USADA

SUBMITTED

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

**USADA generally supports the idea of educator competencies being added to the ISE.**

USADA currently has a robust educator training program that incorporates Bloom's taxonomy and other relevant learning theories. The program has built in recruiting, training, vetting, and quality assurance metrics as well as retraining and accreditation. While we want to ensure that globally ADOs are creating a robust education program we also need to take into consideration their anti-doping system and be sure not to create barriers to their ability to deliver. Generally, there is a need for oversight by way of the standards, but autonomy from each NADO will need to be considered as well. We would support the guidelines and encouragement of ADOs to create/adhere to educators' competencies.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

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

It is recommended that in determining the competencies and knowledge-base educators should have, that care must be taken not to make the requirements too onerous to attract personnel who are largely volunteers in many countries.

It is agreed that a wider umbrella of personnel could be considered as in some cases those who develop, monitor and evaluate education plans and initiatives might not be the personnel delivering the content or facilitating sessions.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

Consideration should be given to the fact that the educators trained to deliver the education might not be the same person who is planning and evaluating the education programmes. Educators in some jurisdictions might simply be people conducting the education sessions.

Any competency requirements will need to encompass at least these two dimensions so that potentially proficient educators are not eliminated because they do not possess the other competencies (required by an education trainer/education coordinator).

### SEARADO

SUBMITTED

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

Clearer guideline as to who ought to be an educator ( e.g. based on their background, e.g. teacher/trainer certification). If those who do not have any (including athletes, doctors) , a guideline on what they need to go through to qualify as an 'Educator'

### University of Birmingham

SUBMITTED

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

No relevant themes have been identified for this concept to date, but they are likely to be identified during our next stage of analysis when we analyse the interviews with ADO staff other than Education Managers.

### International Testing Agency

SUBMITTED

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

We fully support the further definition and specification of the nature and scope of an educator's profile, and we



would also recommend to complement any possible ISE change with practical guidance in the ISE Guidelines or other documents.

### **Aston University**

Kris Lines, Senior Lecturer (UK)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

While I would be supportive of minimum standards for educators, given the proposed increased number of Athletes / ASPs within the potential pool (Concept #7), this may necessitate a need for more educators. If the requirements were too onerous, this may mean that signatories struggle to appropriate resource this.

One way to streamline this process would be to accredit / recognise educators with "formal teaching qualifications for their jurisdiction" as they would have been trained in the pedagogical approaches to education, often to a much higher level than an internal IF/ NDO course might deliver to new applicants. I would be in favour of keeping this recognition broad as the wide range of ages and educational ability of the athletes in the education pool, may mean that there is a need for a variety of educators (from primary to tertiary or higher professional)

Similarly, sports-specific tutors for IFs/ NGBs will have undergone regular training and already deliver education programmes for coach education, so while they may not have formal educational qualifications, they are already accredited by the IFs to deliver education.

The more difficult question would then be whether to / or how to mandate awareness and competency of the sports-specific elements. Or whether this could be left to the signatory organisation to reach their own conclusions as to the appropriateness of this educator to deliver the core technical content, since they are already proven educators, and the technical syllabus is clearly listed.

At the moment, consideration of teachers and university staff is included in 4.3.5 as 'targets' within the education pool, rather than as part of the education team.

## **Concept #3 – Monitoring and Evaluation (31)**

### **International Taekwon-Do Federation ITF Vienna**

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

SUBMITTED

Feedback through monitoring and evaluation is vital to see if the ISE is fulfilling its purpose. To make things easier for each IF, National Federations, etc, a "universal" template would be of great use.

### **FEI**

Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)  
Sport - IF – Summer Olympic

SUBMITTED

Monitoring and evaluation is a time consuming, tedious work and it would help ADOs if WADA provided tools to carry out these tasks effectively.

### **World Rugby**

Ross Blake, Anti-Doping Education Manager (Ireland)  
Sport - IF – Summer Olympic

SUBMITTED

We consider that this is an important area (given how much we could be wasting effort and energy on poor education, as an industry) and forcing evaluation as a compliance requirement is in our view a good thing. The point is that it clearly is daunting and (we suspect) most problems are likely to be the result of a lack of resources to properly evaluate. If all the ADOs time and energy is spent on delivering education, where and when does it get the time to evaluate? We find this difficult enough, we have a team of 1.5 staff, but many ADOs will have less and if it's a decision between whether to deliver education, or evaluate it, the former will always be priority. As such, we would propose that some minimum (base level) and recommended (higher level) measures be stated in the ISE to make the process more accessible for ADOs.

However conversely, we also consider that in the same way that ADOs must publish test statistics annually,

education statistics (even if basic) should also be published annually as a compliance requirement as well. This will then mandate M&E and should lead to more compliance in this area.

We wonder whether M&E could be better set out in the ISE so that for each defined education activity, we define what the minimum (or recommended) activity would be to evaluate it. That way, M&E is embedded in the activities and shown as an integral part of the education activity (as opposed to just an add-on at the end of the cycle). This would also seem to start to help us gather a worldwide body of evidence on the general efficacy of each type of activity, as opposed to what is a more ad-hoc system currently.

## ISU

SUBMITTED

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

From the CISP it is proposed to provide webinars, factsheets, video tutorials, and presentations to educate and set-up an Education Program which is useful. However different tools should be given to help us monitoring and evaluating these resources and the AD Program and how to interpret and integrate these data efficiently.

We do not have constant direct access to our Skaters and/or to promptly monitor their grasp of anti-doping concepts and rules.

## Botswana Football Association

SUBMITTED

Boago Diphupu, Mr (Botswana)  
Sport - Other

To be honest Monitoring and Evaluation is needed in most cases it is not there mostly in small countries

## UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

We agree with the proposal to add additional weight and guidance behind this principle.

## USA Track & Field/American College Sports Medicine

SUBMITTED

Dr Mark Troxler DO MBA FACP FACSM, Chair, Anti-Doping Education Committee/Anti-Doping Interest Group (USA)  
Sport - Other

An education program is essential. However, assessing the effectiveness of the program is always a challenge. Typically after an education program we always have attendees complete an evaluation form in in order for each group (athlete or ASP) to receive credit.

## Sport NZ

SUBMITTED

Jane Mountfort, Principal Policy and Legal Advisor (New Zealand)  
Public Authorities - Government

This submission is made on behalf of Sport New Zealand, which is the Crown agency responsible for advising the New Zealand government on anti-doping policy and ensuring New Zealand's compliance with the International Convention against Doping in Sport 2005.

Sport NZ is supportive of the provision of additional guidance from WADA as to how signatories can fulfil the evaluation requirements in the International Standard for Education.

While assessing delivery is one aspect of evaluation, Sport NZ recommends WADA further consider guidance for how ADOs can monitor their education programmes for impact in order to assess the effectiveness of those

programmes in achieving a clean sport environment.

### Swiss Sport Integrity

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

SUBMITTED

- SSI fully agrees having monitoring and evaluation as an integral part of education.
- SSI fully agrees to add resources in the CISP.

### HADA (HELLENIC ANTIDOPING AGENCY)

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

SUBMITTED

To begin with, we think that the total absence of published data by default in the education sector, whilst education should precede all other antidoping functions / operations, is not reasonable. There should be something to be held upon (regarding the Monitoring and Evaluation) for the education departments, which could also assist us define more realistic, precise and attainable objectives in our education programs. We are inclined to say that the current social science research standard questionnaire is not the ideal textbook template to begin with, as some parts of it contain too stereotypical questions which would probably make the trainees uninterested; this would subsequently render the results unreliable and our future efforts non-consistent with the desired outcome. However, this is just a mere opinion and it may not coalign with reality. Nevertheless, this concept is a crucial one, and there is work to be done in order to clear up the air around it and set a common, efficient path for all partners regarding that subject.

### Organizacion Nacional Antidopaje de Uruguay

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

It is very important to be able to support the NADOs in creating financial support not only in social research and subsequent education but also in putting together a tool supported by the development and design of WADA so that each NADO can culturally involve and self-finance their areas of strength in each country emerging education

### Dopingautoriteit

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

The core education target groups of Doping Authority Netherlands are: elite athletes (aspiring and actual), trainer-coaches and parents of aspiring elite athletes. The education pool therefore exceeds the minimum WADA requirements. This automatically makes monitoring and evaluation more challenging.

In our case, the primary challenge is to set objectives in the education plan. We have invested a lot of time in the assessment of our education pool because we depend in this area on input from the Dutch sports federations. International federations work with one sport, or a small number; we work with 58 different sports federations. These sports federations may also cover multiple sports, and those sports in turn can have multiple disciplines. We also depend to a major extent on the efforts of the Dutch sports federations to deliver education. It is therefore very difficult to organize our efforts in line with specific goals.

Assessing the effectiveness of our educational activities is also a major challenge. We have found few useful examples in the Code Implementation Support Program (CISP). How do others address this issue?

### JADA

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

We strongly agree that Monitoring and Evaluation (M&E) is an integral part of Education. Highlighting M&E as an INTEGRAL part of Education can be made in ISE.

- One of the factors contributing to the CHALLENGES to conduct M&E appears to be a lack of clarity on What, How and Why of M&E. Hence, in the ISE, it would be useful to mention the elements of M&E (what), how and why - including Education Program, Education Plan, Educational Activity and Educator (the details can be in Guideline). We recommed to clarify what is to be monitored and evaluated, and describe the purpose and processes of the M&E in the ISE (the current Guideline illustrates somehow, however it is not practically be useful).
- Identifying individuals and monitoring their education paths/history is practicaly difficult. It would be useful to mention a minimum level of whom to monitor (as commented in Recognition), ie. the minimum required Education Pool (RTP/TP/Other Pool athletes). For this, it can be recommended to utilize the existing platform, ADEL and/or ADAMS. We would recommend ADAMS because of the shared history can be identified between IF and NADO if the athletes were educated or not in advance of testing (as per ISE principle). Some ADOs do not necessarily mandate ADEL as required platform to use for education.
- Though proposed in Concept paper, CISP sometimes becomes very difficult to understand, especially for non-English native people. CISP and GLDF is indeed helpful for building capacity as Education practitioner, but it would be more useful and helpful to provide multi-language resources or resources categorized depending on cultural/continental basis.
- Some countries may have done evaluation without necessarily including researchers. However, becuae of language barriers, we feel that some have not submitted or written a full evaluation report that had included researchers. It would be useful to identify what is a minimum level of Evaluation we are expected (as I&I International Standard, setting from a minimum - putting available information together to use to inform the next actions - to maximum - including researcher and multiple year of researches) - possibly in Guideline to clarify.

#### **Anti-Doping Agency of Serbia**

Bojan Vajagic, Director's Assistant (Serbia)  
NADO - NADO

SUBMITTED

Monitoring and evaluation as an integral part of education should be more emphasized and clearer explained within the ISE.

#### **NADA India**

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

The concept of monitoring and evaluation in anti-doping education is undeniably fit for purpose. It is essential to assess the effectiveness of education programs, ensure compliance, and identify areas for improvement. This may improve further by emphasizing in the ISE with increased requirements and clearer guidelines on how to carry out monitoring and evaluation effectively. This will help organizations capture data, assess the impact of education programs, and drive continuous improvement.

#### **Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

It is obvious and important that we monitor some key figures in the field of education. Naturally it can provide insight into effort, work, quality, scope, etc. Likewise, it will emphasize the importance of education in the global anti-

doping system when we also report education figures and not just testing figures.

It might be helpful to introduce some key areas for evaluation in the revised ISE.

### **Drug Free Sport NZ**

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

Because the ISE is in its early stages, we believe the role of monitoring and evaluation needs more time to grow and develop, reflecting that different ADOs are taking different approaches

However, we do think clearer guidelines on how to evaluate activities would be beneficial, and could potentially give WADA consistent evaluation information.

### **ONAD Communauté française**

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

We share the observation that education is one of the rare anti-doping areas that does not generate published data by default.

However, again, this Standard:

- is still recent and its implementation is still in progress;
- must remain flexible and not adding additional requirements.

Furthermore, we also share the observation that the evaluation was mainly implemented in the largest ADOS.

For smaller ADOs, who have fewer resources, the implementation of the program is still ongoing. The evaluation will therefore come in a second step.

The current lack of evaluation, especially for smaller ADOs, is therefore more related to a question of fewer resources and time.

About the ISE Drafting group proposal to review:

- the role of monitoring and evaluation as an integral part of education, which helps Signatories to further understand and deliver this concept in practice.

The intention is good but again, this Standard must remain flexible and additional requirements must not be added, particularly due to the limited resources of most signatories.

Ok to clarify and improve understanding of the concept and role of evaluation but not to add additional requirements.

- The mechanism by which this can be achieved through the ISE and other support mechanisms such as resources in the Code Implementation Support Program (CISP).

As explained before, this must be achieved by the more flexible mechanism possible (guidelines?);

There must be no additional requirements or increased resources.

Kristina Coburn, Compliance Manager (Russia)  
NADO - NADO

RUSADA proposes to expand ISE guidelines by sharing best practice and examples of basic monitoring and evaluation tools necessary for high-quality analytics for each education pool.

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

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

#### ***Output vs. Outcome***

First if all, it is understandable, that there is lack of knowledge among signatories when it comes to M&E. Historically, not many signatories did M&E in other fields of the anti-doping work, so why should they do it in the “new” field of Education.

It is interesting to see that education always has to prove its effectiveness while other fields don't have these obligations (at least not in the respective international standards). For example, there is no requirement in the ISTI whether the testing program shows any effect. The TDP also only focusses on proper distribution and the TDSSA focusses on a minimum level of certain analysis, but not on the effectiveness of the program in the long run. The only reference to M&E is that the ADO “shall monitor, evaluate and update its Risk Assessment and Test Distribution Plan during the year/cycle in light of changing circumstances and implementing the Test Distribution Plan.”

One possible solution to make M&E easier for signatories would be a clarification that the minimum requirement is to evaluate the output of the education program. The outcome / effectiveness of the education program is something far more difficult to assess and might for some only be feasible in cooperation with a university or scientific expert.

#### ***Education Report***

We suggest that there needs to be an education report that WADA is publishing similar to the testing figures report. The challenge will be to establish a harmonized reporting system to have comparable results, but this is needed to further promote the importance of education.

A starting point will be clear definitions of the different activities. The current CCQ already requires ADOs to report their figures. To serve as the basis for an education report, further though must be given to certain categories (e.g. there is a level of sport for athletes (RTP, International Level, National Level, etc.), but not in connection with ASP.

See also comment on Concept #7 “List of target groups”

#### ***Track Records necessary for every activity?***

We have had the discussions on an education passport where you can see all the different education activities a person participated in during his career. This would certainly be great, but there a lot of administration needed to cover everything. And sharing information might also lead to problems connected to GDPR.

And the question is if that is really necessary or even helpful. Would it not be enough to have an individual track record of the basic education (e.g. a mandatory eLearning course with a refresher every year or two that covers all the important topics) and record all the other activities that are on top of this only at a general level (e.g. national team x was educated on this day, there was an outreach at event y) without individual names?

For ADRV cases the basic information is enough to prove that the concerned athlete / ASP was educated. Maybe it would help the case to a certain extent to have multiple records on the education of the concerned athlete / ASP but if that is a justification to create all the administrative work is worth a discussion.



Also, for recognition it is enough to have records in the basic education and the records on the general level (e.g. the national team was educated before the international event).

### **COCOM**

Stephanie Sirjacobs, Legal adviser (Belgium)  
NADO - NADO

SUBMITTED

Vu les difficultés rencontrées et les constats posés lors du CCQ par l'AMA, attention à ne pas en faire une obligation plus contraignante ou encore plus difficile à atteindre. L'AMA devrait s'interroger sur les outils qui pourraient être mis à disposition des signataires pour les aider dans cette évaluation plutôt que renforcer l'obligation à ce sujet, peut-être via des lignes directrices pour commencer ? Et voir l'évolution que ça va amener au sein des signataires + s'ils sont prêts de voir le Code se modifier en 2033 à ce sujet (parce qu'amélioration des procédures et résultats d'évaluation au sein des EM) ?

### **Anti-Doping Norway**

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

SUBMITTED

We support continuation of the requirement of Annual evaluation.??

Now that an increasing number of resources are dedicated to education following the implementation of the ISE, it is important that the resources are put to good use. To achieve this, both monitoring and evaluation are important.??

Both monitoring and evaluation requirements should be continued in ISE.??

What distinguishes and characterizes monitoring and evaluation must be more clearly specified.?

At the same time, there must a degree of flexibility in monitoring and evaluation requirements in order for it to be adapted to the cultural context. Both the design and implementation of the education and prevention programs should be adjusted to the local culture and context to maximize its effect. We need to have this in mind, when developing monitoring and evaluation requirements. Otherwise there is a risk that the requirements will be too static and allow for the national adaption which is absolutely pivotal for the success of education and prevention programs.

### **Sport Integrity Australia**

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

SUBMITTED

SIA believes that monitoring is an integral part of an Education program, in the same way that the ISTI requires ADOs to monitor their TDP regularly. Consistency in expectations across both areas ensures that ADOs continue to increase their commitment to education.

Greater emphasis could be placed on signatories setting ambitious targets, and acceptance that not meeting all of them is ok. We are confident that we collect sufficient data for monitoring purposes but are always open to further guidance in the form of the ISE or implementation guidelines to improve our monitoring systems.

In our experience, evaluation is unfortunately often seen by many as a daunting requirement. Consideration could be given to removing or rewording section 6.3 to try to mitigate this perception, and moving engagement of academic partners to a guideline. Greater emphasis could also be placed on evaluating activity-based learning, and basic program evaluation rather than impact assessment.

Many ADOs may benefit from the publication of a template of priority areas to monitor and evaluate in a program, or the sharing of evaluation reports across ADOs, to increase awareness of options in this space. SIA would be willing to share our own monitoring report, noting the value we would gain from learning from others in exchange. Options provided which showed 'minimum monitoring requirements' and 'advanced recommended monitoring

requirements' would assist.

Australian stakeholders also noted that the CISP could emphasise the different aspects of evaluation i.e. evaluation of the education/content and separately of the quality of delivery/facilitator feedback. The latter is often minimised, so it would be useful if the CISP could support in the area of giving feedback and how to act upon it in a constructive way.

### Canadian Centre for Ethics in Sport

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

Article 6.0 is clear, but there is room for improvement and standardization. Standardized formats for reporting do not exist, and metrics do not appear to be consistent. Education plans may change during a given year – responding to weaknesses, taking advantage of strategic opportunities, or responding to specific threats can turn a solid education plan into a living document and require pivots in how evaluation is conducted.

Standardized metrics, both quantitative and qualitative, could help organizations. Some for consideration include:

- Have tested athletes been educated first? What percentage have received education prior to testing?
- Has the education pool, as defined, been educated via one or more activities?
- Have the required activities (awareness raising, information, anti-doping education, values-based education) been delivered to the pool?
- What qualitative feedback has been collected on the program? (This should explicitly include athlete voice, and an explanation of how athlete voice informs program development). What does it suggest about the current state of delivery? How can gaps or weaknesses be addressed?
- In which activities are the eleven key topics in Article 5.2 addressed?
- What measures of effectiveness have been established, e.g., are learners successfully able to demonstrate learning across “be aware of,” “understand,” and “be capable of doing” per Article 5.4? What are the results of those measurements?

The Guidelines can delve further into possible ways of evaluating these items, and why they are important.

The following clarifications could assist:

- Clearly articulating in Article 6.3 that that evaluation can be conducted internally and does not require, but can leverage if desired, external academic or professional help.
- The comment to Article 6.3 perhaps over-emphasizes the role of social science research in program evaluation, and would be better suited to the Guidelines than to the Standard.
- Regarding learning objectives as a way to structure evaluation of effectiveness, we should reconsider the verb “understand” in Article 5.4. What conversation, products, or conversations are indicative of understanding? Is the learner performing recall?

### UK Anti-Doping

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

SUBMITTED

- An additional challenge is the resource required by organisations (Sport Federations) to record the participation of individual athletes or ASP in education activities, especially when the organisation has significant numbers in their education pool (or very limited staffing and resource).

■ Agree that monitoring and evaluation is a key challenge across the landscape. Any advice/tools that could be easily implemented and universal would be beneficial. For example, how to monitor and evaluate impact within outreach activities has always been difficult and inconsistent. The focus since the introduction of the ISE has been on the delivery of education to the mandatory groups. 'Monitoring' processes are mixed across the organisations which deliver education, however, high quality 'evaluation' is much sparser.

■ Further emphasis in the Code on M&E would be welcomed and would give us more powers to influence Code signatory partners (and delegated federations) The mechanisms utilised in the initial launch were positive (CISP etc).

■ Receiving feedback and views and opinions from learners is a challenge, which creates an issue in having sufficient data to conduct in-depth evaluation.

■ Whilst in agreement with the principle of conducting an evaluation to inform the next years plan – in practice, the timing of this doesn't work in reality.

■ Given the challenges with reporting on M&E from across the CCQ, to make this more achievable for signatories, could Monitoring be kept as a mandatory reporting component of the ISE (similar to testing figures reporting) whilst formal evaluation shifts to being 'not mandatory' and seen as 'going above and beyond' - based on the challenges reported, and the resources available to ADOs in question?

## USADA

SUBMITTED

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

**USADA believes that processes of monitoring and evaluating are an integral part of an effective education program. These functions help Signatories to further understand and deliver this concept in practice and with the guidance and support from the CISP and GLDF, ADOs could feel more prepared to implement.**

**In our experience, this is an area in which practitioners feel least confident. More support by means of templates and data analysis could be offered in the guidelines. The terms 'monitor' and 'evaluation' are broad in nature, therefore, USADA recommends topics of focus be introduced in the ISE to help ADOs narrow down what to evaluate.**

## Caribbean Regional Anti-Doping Organization

SUBMITTED

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

It is agreed that monitoring and evaluation are key parts of the overall process. Revisions to the related mechanisms would be welcomed, with consideration given to delivery modes to ensure that one area is not prioritized/more heavily weighted over another (e.g. online modalities being seen as preferred to/more measurable than face to face interaction). It is hoped that any established reporting structure and associated timelines would not be too complex/demanding for entities already experiencing human resource challenges.

### Caribbean Regional Anti-Doping Organization

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

SUBMITTED

Comments here are based on the CCQ reporting of Tier 1-3 countries in relation to their education programmes. Tier 4 countries have not yet been evaluated and perhaps the findings might not differ greatly on this concept. However, recording participation can be considered separate from the determination of objectives set in the education plan being achieved. Additionally, evaluation not seen as an integral part of the education programme might be a reflection that given the lack of resources, it might seem more important for ADOs to conduct the education training than to do the evaluation AND education.

### SEARADO

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

SUBMITTED

Tied in to the Recognition of Programs. Need to be specific that monitoring and evaluation must cover all topics

### University of Birmingham

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

SUBMITTED

As described under Concept #1, several organisations appeared to follow an adoption strategy, wherein existing operational frameworks were aligned with the ISE requirements wherever possible. This retrofitting process aimed to identify and address discrepancies, only implementing changes where a clear discrepancy was apparent. One area with discrepancies that appears to have been overlooked – and therefore not addressed – is the establishment of comprehensive monitoring and evaluation (M&E) mechanisms. This is likely at least in part to be due to notable inconsistencies in the comprehension of M&E processes. Predominantly, organisations largely perceived monitoring as a continual review of educational activities, whereas evaluation was seen mostly as the collection of feedback forms post-session. There was one exception to this though, with one organisation having a more comprehensive grasp of M&E. However, even here there was recognition of weaknesses in applying M&E practices within the ISE framework and the need for further improvements.

### Aston University

Kris Lines, Senior Lecturer (UK)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

I was less clear on the KPI (key performance indicators) within this area. Was the monitoring and evaluation based on the number of athletes / pool members that had received 'education'? Or based on a measurable indicator? - attendance / delivery might be one indicator, but that does not necessarily mean that the athlete has learnt anything. Similarly, is there a disconnect between number of hours (quantity) and the quality of the delivery? - at the other end, one way to establish 'success' is through some sort of assessment. However, this raises its own problems - for example, should the athlete be proctored/supervised to ensure that they have taken the assessments? Does it matter if an athlete does not know the technical details as long as they have the right support teams around them? Similarly, some of the most valuable learning comes from reflective activities / discussion, but this can be very difficult to assess (and some would argue that the very process destroys true reflection!) I think there are also bigger questions about equivalency here - as to whether an online self-completion course equates to a live face-to-face group session; or whether an intense programme from a well resourced signatory is equivalent to a less ambitious plan from a smaller organisation? I would have liked to have seen more clarity as to what type of data is needed/ desired.

## Concept #4 – Athlete Support Personnel (33)

### International Taekwon-Do Federation ITF Vienna

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

SUBMITTED

I totally agree that further guidance and instruction should be provided on certain groups of ASP being included in an education pool by using the Code definition as a starting point and t

hat the most influential ASP specific to a given sport or country are identified so that they are included in an education pool.

## FEI

SUBMITTED

Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)  
Sport - IF – Summer Olympic

I agree with the ISE Drafting Group proposal.  
It would help if national training programmes for coaches and sport medical practitioners included anti-doping.

## World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)  
Sport - IF – Summer Olympic

We support the idea of looking more closely at how ASP education is managed and prioritised (and behaviours identified). However one of the issues with ASP as a group (for our sport at least) is often the wide range of ASP that may work with our teams/players/athletes at any given time during an annual or competition cycle. These individuals can change on a regular basis and it's difficult to track whether they have completed education or not (they may have also done education via their NADO, or in a previous role). There's also often a lot of peripheral team staff who work with our teams (to different levels of time commitment) but have no involvement with Anti-Doping, so it may mean a lot of ASP categories if we were going to define all of these separately. They wouldn't all need Anti-Doping education. On a related point (not about ASP) we tend to find that parents are less relevant as a target audience for an IF who have few if any minors competing at international-level.

## ISU

SUBMITTED

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

It seems to be very relevant to include ASPs in the education pool. Coaches and Team physicians often guide and/or decide on the athletes' sporting development, especially when the athlete is a minor.

## Botswana Football Association

SUBMITTED

Boago Diphupu, Mr (Botswana)  
Sport - Other

need to manage and support during sport life

## UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

We agree that the definition of ASP is very broad, and guidance should be given to support ADOs to identify the most key target groups so that education of ASP becomes more achievable.

## USA Track & Field/American College Sports Medicine

SUBMITTED

Dr Mark Troxler DO MBA FACP FACSM, Chair, Anti-Doping Education Committee/Anti-Doping Interest Group (USA)  
Sport - Other

We would support an Education Pool for ASP. As a result only certified ASP in the education pool will be allowed to be in contact with any athlete, including our youth athletes.

## Sport NZ

SUBMITTED

Jane Mountfort, Principal Policy and Legal Advisor (New Zealand)  
Public Authorities - Government

This submission is made on behalf of Sport New Zealand, which is the Crown agency responsible for advising the New Zealand government on anti-doping policy and ensuring New Zealand's compliance with the International Convention against Doping in Sport 2005.

New Zealand's National Anti-Doping Organisation is Drug Free Sport New Zealand (DFSNZ). DFSNZ operates an education pool that is primarily focussed on athletes, but some Athlete Support Personnel (ASP) are included in education pools.

DFSNZ reports that there is often a challenge in identifying ASP who are bound by New Zealand's Sports Anti-Doping Rules that implement the Code (SADR) who would benefit from anti-doping education. Unlike athletes, many ASP do not have a direct relationship with National Sporting Organisations who have adopted the SADR so it may be difficult to identify the precise pool of ASP for education purposes.

Sport NZ considers that further guidance on education of ASP would be beneficial. However, Sport NZ considers selecting any group of ASP to whom mandatory inclusion in the education pool would apply would require very careful consideration having regard to the identification issue discussed in the paragraph above and the potential resourcing implications for ADOs. It may be too early in the maturity of the ISE to provide for mandatory inclusion of ASP in the education pool.

We would want the opportunity to comment on any more refined proposals in due course. Any requirements for mandatory inclusion of ASP in the education pool could have resourcing implications for the New Zealand government. It would be beneficial if information could be provided on the relative priority of educating ASP compared with athletes to help us understand the implications of any change.

## Swiss Sport Integrity

SUBMITTED

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

- SSI fully agrees to expand the education pool to more athletes and to the ASP. ASP play a crucial role, education should be mandatory in order to protect clean athletes.

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

Trainer-coaches and parents are already part of the core groups targeted by Doping Authority Netherlands. We certainly believe it is a good thing to encourage signatories to focus more on support personnel as well and to provide them with guidance. The biggest challenge in reaching parents is that they often don't have a direct link with the Dutch sports federations, making them a harder to reach target group.

## HADA (HELLENIC ANTIDOPING AGENCY)

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

The reason why ASP is not as widely included as athletes in the education pool is that according to the ISE, there is no obligation for them to be included whereas there is for the RTP and sanctioned athletes. However, it has been proved from various researches that ASP members not only have an unequivocal effect on the athlete behavior and mindset, but they also have been found as culprits to many ADRV cases. Therefore, it would be more than



reasonable to review whether some target groups of the ASP should become mandatory. An indicative initial proposal could be to make the medical staff and coaching staff of international level athletes mandatory and to apply the same measure for international level minor athletes plus their parents.

### **Organizacion Nacional Antidopaje de Uruguay**

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

We understand that education processes must be mandatory for the athlete support staff. to be able to monitor and return information in real time to the ONAd or the Fi so that they, as WADA stakeholders, can report delays. diversion etc and be supported by WADA in collecting mandatory attention.

### **Anti-Doping Agency of Serbia**

Bojan Vajagic, Director's Assistant (Serbia)  
NADO - NADO

SUBMITTED

The priority ASP cohorts should be defined as mandatory pool and more emphasized in the ISE.

Guidance and instruction should be provided for ASP who will be included in defined education pool.

### **JADA**

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

We strongly agree on including ASPs in the required Education Pool.

Although ASPs have the strong influence on the athletes throughout their sporting career, the identified ASPs are practically difficult to reach (if we like to reach from schools to elite / national-representative level), and they are not necessarily enthused to take education even though it becomes mandated ("mandatory" terminology does not necessarily work and touch their heart). However, there should be stated as a "minimum standard" level with prioritization. We suggest:

- ISE 4.3.3 second para to be revised something as: "ASPs of RTP and Athletes returning from a sanction shall be included in Education Pool" (current sentence is unclear).
- ISE 4.3.3 third para can give a little more weight with priority; something as: "those national coach, trainers, managers and team staff who accompany for Olympic/Paralympic Games and continental Games shall be educated before such competitions" - in this way, two biggest multi-sport events can be captured. (therefore, this needs to be reflected in ISE Chapter 7)
- It can be recommended to include clean sport education as part of the coaching system in a country or a sport (making reaccreditation criteria too).

### **SLOADO**

Nina Makuc, education coordinator (Slovenija)  
NADO - NADO

SUBMITTED

At a minimum ASP working with athletes that are mandated to be included in education pool should be mandated to be included in education pool as well.

### **NADA**

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

SUBMITTED

NADA Germany supports the idea of the ISE Drafting Group to examine further guidance and instruction on certain

groups of ASP. In the ISE, the curriculum for ASP should be outlined and the ISE should include information on the role of different ASP for the athletes.

### **ONAD Communauté française**

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

We also share here the observation that there are no mandated cohorts of ASP and that may lead to a reduced focus in terms of targeted education activities.

But again:

- the implementation of the Standard is still recent and still in progress ;
- resources have already recently increased and are not unlimited, especially for smaller ADOs.

About the ISE Drafting group proposalsto review:

- If any further guidance and instruction should be provided on certain groups of ASP being included in an education pool by using the Code definition as a starting point.

Using the Code definition is indeed a good starting point.

But again, the key word is flexibility

Ok to further guidance but no additional requirements.

- Whether guidance or direction should be provided to ensure that the most influential ASP specific to a given sport or country are identified so that they are included in an education pool.

The same answer can be given.

Ok to further guidance but no additional requirements.

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

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

SUBMITTED

#### ***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."

## **Education before testing their athletes**

That said, there should also be the right for ASP to be educated as it is the right for athletes to be educated before testing. We don't have any in-depth suggestion yet where the level for this right for education starts but it could also be something in relation to testing (e.g. when ASP is working with athletes who are likely to be tested).

### **NADA India**

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

1.

The concept of educating Athlete Support Personnel (ASP) is essential, given their significant influence on athlete attitudes and behaviors. It is fit for the purpose of promoting clean sport and maintaining integrity in sports. The concept faces challenges in practice. ASP are not mandated to be included in education pool(s), leading to reduced focus on targeted education activities for this group. The expansive definition of ASP also complicates the identification of specific target groups.

2.

To address these challenges, it should be emphasized more within the ISE with increased requirements and clearer guidelines on how to identify and educate specific ASP groups effectively. This will help ensure that ASP understand and promote clean sport principles and contribute to maintaining the integrity of sports.

### **Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

In the current version of the ISE, ASP is defined as one very large and unspecific group of people – it can be everybody from coaches, team managers, doctors, physios, parents etc.

When we in Denmark started working with implementing Education Plans with our National Federations and NOC, we quickly decided to focus on the group of ASPs closest to the athletes namely coaches and team managers which also is the group of people the federations and we have the best access to. In some cases when working with minor athletes it can also be parents even though we only can encourage - not demand - parents to be educated.

We believe it will be applicable to outline in the revised ISE, that when an ADO work with a group of athletes it will be reasonable to ask minimum the connected coach/team leader to be educated as well.

It will for sure help the ADOs to focus on this relevant group of people with the possibly highest impact on the athletes, and possibly also the group of ASPs that is the easiest to access.

### **UK Anti-Doping**

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

SUBMITTED

■

As part of our Major Games Education Policy, we recognise the importance of ASP education and mandate

education for the most influential (High Performance) ASP supporting athletes who are trying to qualify for a Major Games. We encourage wider ASP to be included in education pools in National Federation Education plans across the landscape.

■  
Additional guidance and instruction would be welcomed to drive up education standards across the ASP landscape

### **Drug Free Sport NZ**

SUBMITTED

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

As a concept, we are supportive of what this is trying to achieve and DFSNZ currently includes ASP in some education pools. However, we believe the ISE is too early in its maturity to come to a firm position on this, and at this point, cannot be mandated. In our experience, the ASP set-up within each sport can be very different and this makes a singular approach very difficult.

A very important point to consider is that not all ASP are bound by the code. For example, not all ASP are members of sports - they are often contractors (such as nutritionists or physios) who are therefore not bound and not in our jurisdiction.

The cost and funding implications also need to be considered here, along with the practicalities of increased Education Pool requirements for smaller/less-resourced ADOs.

### **Anti-Doping Norway**

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

Athlete support personnel are an important resource for athletes. There is an expectation from athletes that coaches and managers have knowledge of the anti-doping rules.

There is often a large turnover of support personnel around athletes, so it is important that a minimum knowledge requirement is expected of support personnel. There should be a requirement in the ISE that NADOs offer training program adapted to support personnel. However, there should not be a requirement that the NADO shall secure that the support personnel have received the education, as this in many contexts will be beyond the NADOs mandate, and not possible to implement.?

On a practical note, however, given the broad definition of Athlete Support Personnel (including "Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competition"), it is important to set the expectations/requirements on the basis of a risk assessment to ensure an appropriate balance/level of expectations.

### **Sport Integrity Australia**

SUBMITTED

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

It is viewed as essential that ASP are mandated in an Education Pool, however there is difficulty in how accessible these individuals are to the ADO.

In an Australian context, we have found the broad definition of ASP has, at times, created difficulty in our efforts to develop tailored education plans with our National Federations.

ASP cannot be included as a holistic group in any planning due to large variance in access and influence among

the different personnel included. For example, paramedical personnel may have limited exposure to an athlete outside of acute healthcare scenarios, and in many sports there is no compliance lever that can be used to engage parents on education requirements.

Conversely, coaches play an integral role in the decision making of an athlete and should be included in any effective education program. Our approach has been to identify the most important personnel, and those who can be mandated to be educated by their sport and have developed those specific education pools accordingly. Direction could be provided in the ISE as to how these integral personnel are engaged in the education pool. Noting that in some sports, it is common for elite level coaches to work across multiple countries through their careers, having standardised approaches would assist.

One Australian stakeholder also suggested that WADA provide advice on who the most influential ASP are in WADA's view (ie as identified through research). This would support any sport/country who may not be clear on who these people are/ or how to identify them and they reach a decision based on assumptions rather than research – through research can WADA not be confident in mandating education for as an example, coaches of international athletes? If the research is unclear or unable to determine the most influential specific ASP roles globally, discretion could be given to the sport/country. To help sports/countries identify the ASP to target, WADA could consider providing some resource/s e.g. an athlete – ASP perception survey template, which an ADO could run and take guidance from.

### **Canadian Centre for Ethics in Sport**

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

As Athlete Support Personnel have many more points of contact with athletes than many Signatories do, it is imperative that they are addressed in the ISE.

The CCES created a dedicated category of designated Athlete Support Personnel who have a mandatory annual education requirement, which addresses the requirements in article 4.3.3.

The requirements present a wide range that allows Signatories to decide for themselves how far they are going to go in educating Athlete Support Personnel. Article 4.3.3 establishes a floor that “Signatories shall, within their means, ensure that Athlete Support Personnel have access to the information required to understand their roles and responsibilities and positively influence their athletes.”

Perhaps requiring ASP working with RTP athletes and athletes returning from sanctions to participate in anti-doping education, as well as receiving information, would be a more appropriate floor. However, the problems faced by some Signatories in accessing and tracking Athletes' participation in activities would translate to ASP as well.

“The most influential Athlete Support Personnel” is vague. Is there research to show which ASP are more influential? Is this something that an individual Signatory is to determine individually, based on how they construct their Education Pool?

It may be worth revisiting the Guidelines' section on developing an Education Pool and constructing a matrix of priority audiences for different ages, stages, and levels of competition (e.g., coaches and parents for youth athletes, therapists and other medical practitioners for national team members, mission staff for Games teams). This would expand on and perhaps codify more clearly the prompts given in the Guidelines' Chapter 4.

### **USADA**

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

SUBMITTED

**USADA supports further guidance and instruction to certain groups of ASP and believes the minimum pool requirements should be revised to include not only sanctioned athletes, but ASP returning from a sanction. Given the difficulty in identifying ASP, it is our recommendation that there be further guidance around what is considered a “should” vs. “shall” within the guidelines and, at a minimum, should include anyone who receives a credential for major Games (this is one way to identify them more easily).**

**USADA also supports using evidence-based research and findings to identify who the most influential ASP are to better identify who should be prioritized in the education pool. There should be room left for ADOs to consider their unique sport system when identifying who should be in the pool.**

#### **Agence française de lutte contre le dopage**

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

SUBMITTED

La définition du personnel d'encadrement du sportif (PES) est très large (et peut parfois créer de la confusion dans l'utilisation du terme « PES »).

Elle offre néanmoins la souplesse nécessaire aux OAD qui évoluent dans des contextes sportifs et/ou nationaux différents d'identifier les « catégories » de PES les plus pertinentes.

L'article 4.3.3 pourrait être révisé afin d'indiquer, par exemple, que le PES des sportifs inclus dans le pool d'éducation doit lui aussi obligatoirement être inclus dans le pool d'éducation (en demandant aux OAD de préciser les catégories de PES, comme par exemple les entraîneurs et les médecins d'équipe).

Toutefois, imposer des catégories de PES spécifiques devant obligatoirement faire partie d'un pool d'éducation risquerait de créer des difficultés pour plusieurs signataires.

#### **Caribbean Regional Anti-Doping Organization**

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

SUBMITTED

Education for ASPs is important. Additional guidance could be provided to Code signatories to reach/target this grouping. Mandatory inclusion in education pools might prove difficult to manage for some organizations. The notion of "most influential" might also require further discussion.

#### **Caribbean Regional Anti-Doping Organization**

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

SUBMITTED

Some ADOs, especially in our jurisdiction, already include ASP in their education sessions (not necessarily the education pool) so there is support to include the broad definition of ASP in education plans and perhaps the, date informed, most influential ASP in the education pool.

#### **SEARADO**

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

SUBMITTED

ASP to include ASP handling youth athletes

#### **University of Birmingham**

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

SUBMITTED



No relevant themes have been identified for this concept to date, but they are likely to be identified during a later stage of analysis when we analyse the interviews with ASP.

### **Aston University**

Kris Lines, Senior Lecturer (UK)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

While I agree with the broad thrust of this review, I wonder whether this could be further differentiated, as medical / paramedical personnel would need very different information or focus to coaching staff?

The inclusion of parents is interesting as while this group would likely be influential on athlete behaviour (depending on age / level of the athlete), they may not be within the jurisdiction of a signatory organisation if they did not perform a specific role or hold a specific licence. This may represent challenges in mandating that they undertake education? Again, this may demonstrate a need for differentiated educational programmes/ resources as this might be better resourced as a lighter-touch system that allows a greater focus on more regulated or sports-specific personnel/ the athletes themselves.

### **International Testing Agency**

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

SUBMITTED

We fully support the concept and vision to further define and include relevant Athlete Support Personnel (ASP) in education pools, starting with coaches of athletes included in the education pools and other influential ASP. This could be achieved via the use of more prescriptive language in ISE Art. 4.4.3. Equally, we would support the requirement to include sanctioned ASP in the ADO's education pool (mirroring the requirement for athletes) and also the requirement/recommendation to educate ASP associated with athletes found to have committed an Anti-Doping Rule Violation.

## **Concept #5 – Signatories Overseeing other Organizations' Education Programs (25)**

### **International Taekwon-Do Federation ITF Vienna**

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

SUBMITTED

It is vital that both IF and NADO have the same or similar education requirements (including third parties service providers) for the same National Federations, meeting the same ISE standards.

### **FEI**

Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)  
Sport - IF – Summer Olympic

SUBMITTED

Code article 20.3.13 requires that IFs "[To] plan, implement, evaluate and promote anti-doping Education in line with the requirements of the International Standard for Education, including requiring National Federations to conduct anti-doping Education in coordination with the applicable National Anti-Doping Organization". This is a huge undertaking for IFs and at the same time, a necessity, as IFs often end up waste precious resources in attempts to effectively reach their athletes. I fully support the proposal of the ISE Drafting Group, as IFs need to focus on doing the work rather than figuring out how to do it.

### **World Rugby**

Ross Blake, Anti-Doping Education Manager (Ireland)  
Sport - IF – Summer Olympic

SUBMITTED

We would always support any idea to improve oversight and accountability within the ISE implementation process, so any move to develop such a system would be a good idea in our view.

The quality of education is as important as the quality of a test, as both can impact on an athlete equally. As such, it

would seem imperative that all third-party providers must be bound by some defined standard/framework which would help maintain oversight (and quality assurance/accountability). Otherwise, it's impossible for an ADO to be able to ascertain the quality of a programme delivered by a national third party, and whether this should be considered effective education for their athlete or not.

As a general point, for FTF as an IF we would not use any educator who had not been directly accredited by a NADO (though of course we also have to be confident in the NADOs capacity to do their accreditation and quality control effectively). Where our National Federations want to train their own staff to educate, we require them to be accredited by their NADO if they wish us to recognise an FTF session, so we would consider that any third-party education provider would have to be held to the same standard.

## ISU

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

SUBMITTED

Flexibility should be given to the IF to oversee AD Program of National Federations or Third Party and should not be included in the ISE

## Botswana Football Association

Boago Diphupu, Mr (Botswana)  
Sport - Other

SUBMITTED

yes that could help

## UEFA

Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

SUBMITTED

National Federations have a crucial role in coordinating and/or delivering education to athletes under their jurisdiction. Given that they are not Signatories, the only way to structure this is to give NADOs and IFs responsibility for overseeing the delivery. The role of the IF should be to require the NF to collaborate with the NADO on the development of education plans and support the NADO when this is not being implemented.

## Swiss Sport Integrity

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

SUBMITTED

- SSI agrees on more accountability.

## Dopingautoriteit

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

At Doping Authority Netherlands, we need the involvement of Dutch sports federations in order to deliver education to the core target groups. This is not an option. We need the Dutch sports federations to map out our education pool, and they are also our link with the core target groups. At the same time, we cannot oblige sports federations to be involved: they are not signatories. That is a major challenge.

## HADA (HELLENIC ANTIDOPING AGENCY)

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

SUBMITTED

First, the assumption that in some cases, both an IF and a NADO can mandate different education requirements is something expected and completely normal. However, the antidoping education departments and the education plans of all stakeholders (NADOs, IFs e.tc.) are built on the same pillars. It is conspicuous that each sport may present various differentiations which will subsequently amend some specifics in the education planning and hence, in the programs. However, the main foundation remains the same -because we speak the same language and the desired outcome is common- and it is applicable for all three of this unnecessary stalemate. To alleviate this problem though, we should consider that there are two links between these three sides. The first one is the common sport link between the NF and the IF and the other one is the common jurisdiction limits which lie into the same borders for the NADO and the NF. Since prioritizing one link instead of the other would create an imbalance which would seem unfair for either side according to each case, the only feasible solution would be for both the NADO and the IF to provide the requisitioned support and the know-how regarding the filling structure and the organising needed to implement both education plans and to attain the programs objectives to the fullest.

#### **Organizacion Nacional Antidopaje de Uruguay**

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

No comment.

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

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

SUBMITTED

Recognition is important here – see comment on Concept #1

For educators see comment on Concept #2

#### **JADA**

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

We strongly agree and specify the role of ADOs as "overseeing other organizations program", especially for creating a 'sustainable structure/system' for clean sport education, at a national level in particular. Creating a 'sustainable' structure requires NADOs (in particular) a huge amount of negotiations, shared understanding and constant guidance and support. Therefore, the "overseeing role" can be stated as part of ADOs' role.

In order to avoid the "Challenges" stated (re. ...mandate education requirements for the same NFs), we agree to articulate the oversight or accountability framework in ISE.

Because NFs are in-between the requirements IFs and NADOs (communicated separately), we understand as "Challenge" mentioned. For this, Chapter 7 "Roles & Responsibilities" can be revised on the respective roles. This goes to the NOC and NPC too as per the requirement set by the IOC and IPC.

At a national-level, in Chapter 7 or 4, it should mention about the roles and responsibilities of those organisation in charge of or engaged in the institution for high performance development and high performance center. The role of high performance center for the development of elite athletes and youth talent as well as those working for the national team are on the high performance development policy, thus government roles for creating athlete performance pathway should also mention in ISE in order to work together with a NADO (because of government investment for such pathway to create) - **this point goes to Concept #6 too.**

#### **Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

In Denmark we mainly experience education activities from third-party service providers' when IF's provides event-based education activities through international competitions hosted in Denmark.

Obviously, we have no opportunity to oversee these activities, but we try to insist that at least Danish athletes must be trained before the competition.

### **Drug Free Sport NZ**

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

We are not in support of this. The ISE does not have a role in implementing an accountability framework for NFs or third-party providers and it is not practical to consider.

### **ONAD Communauté française**

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

Developing and implementing a framework for the accountability of National Federations (or third-party service providers) is not articulated in the ISE. However, a number of Signatories have nonetheless established this oversight role, for example, certain NADOs and IFs require the submission of National Federations' education plans. This may lead to some emerging challenges specifically in circumstances where both IF and NADO mandate different education requirements for the same National Federations.

That's right and it may imply a lot of work for nothing, in particular for smaller NFs.

In the NADO's perspective we do prefer imply the NFs to cooperate with NADOs but not mandating them to adopt a specific plan which may have contradiction with the requirements of IFs.

About the ISE Drafting group proposalsto review:

- Whether the ISE can effectively articulate the role of implementing an oversight or accountability framework to be implemented by Signatories as it relates to National Federations' or third service requirements.

It's the same comon position, the key word is to remain flexible and not to create additional requirements for NADOs or NFs.

### **NADA India**

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

1.

The concept of Signatories overseeing other organizations' education programs is relevant and can be effective in increasing the reach of anti-doping education. It allows for leveraging the expertise and closer proximity of certain stakeholders and partners to athletes and ASP. Concept faces challenges in practice, as the ISE does not explicitly articulate the role of implementing an oversight or accountability framework for Signatories in relation to National Federations or third-party service providers' education requirements. This can lead to discrepancies and challenges when multiple organizations mandate different education requirements for the same National Federations.

2.

Therefore, clear and detailed guidelines should be provided in the ISE for Signatories regarding their role in overseeing other organizations' education programs. This should include a framework for accountability and coordination. Increasing requirements and providing solutions for coordination and conflict resolution can help ensure that education efforts are effective and consistent across different organizations.

## Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

We believe it's important that the NF take ownership of the anti-doping work by developing action plans and contingency plans. We think it should be more emphasized within the ISE. While we recognize that there is a risk of different education requirements, our experience has been, that the NFs can manage those expectations. Our experience is that the risk of setting different requirements, have been outweighed by the access to code-compliant education in the native language of the athlete, by both athlete, NF, IF and NADO. ?

## Sport Integrity Australia

SUBMITTED

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

In Australia there are some 'third party providers' of anti-doping education outside of SIA, including within National Federations and private businesses. SIA strives to have oversight of these of these programs through building partnerships with these organisations by adding value – i.e. offering to review content, providing co-presenters etc. This is successful in most circumstances but not all.

If the ISE were to articulate requirements on an ADO to implement oversight/accountability for these organisations, it may assist us in gaining traction with these partners. However, any ISE requirements could also be ignored by private businesses, where SIA has no compliance levers to pull. Any ISE compliance measures would need to consider the reality that accountability/oversight may still not be achievable in practice for an ADO.

If IFs only accepted education by educators accredited by a NADO this might assist as an option.

If introduced, a CISP template to use to have oversight of what content is being delivered and how would assist.

## Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

As noted in the concept paper, the ISE does not explicitly suggest these relationships let alone make them mandatory, but these collaborations – and oversight over the Activities conducted – could be beneficial.

The tools already largely exist within the ISE to guide Signatories in their dealings with other organizations. If, for example, a Signatory partners with a national federation to deliver education, it is incumbent on the Signatory to ensure that Educators within the national federation meet the requirements of the ISE. Those human resources, the access to athletes represented by that partnership, the Activities that are conducted as part of that partnership, and the assessment and evaluation that is done on those Educators and Activities should be represented in the Education Plan and Evaluation Report and consistent with the ISE's requirements on those items.

The fact that these relationships and structures can and do exist within anti-doping education warrants their acknowledgement, along with a clearer understanding of what we mean when we talk about third parties conducting education.

## UK Anti-Doping

SUBMITTED

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

■

The implementation of UKAD's Assurance Framework has been a great success, having raised the bar in enabling NFs to commit to being more proactive with their Anti-Doping responsibilities. It is a robust and significant function of our work in ensuring compliance with the National Anti-Doping Policy, requiring

submission of National Federations' education strategies (and wider evidence). Progress is monitored on an annual basis, and an ongoing support program is in place. We have provided a significant amount of support to over 150 sport federations, ratifying their education plans; the model of support was based on the content and requirements of the ISE to ensure consistency.

■  
Guidance regarding how to implement an accountability framework would allow us to baseline our Assurance Framework against the global standard. This point also relates to the issues regarding equivalency or recognition programs as in many instances, the plans do overlap and this is often the key point of contention.

### **USADA**

SUBMITTED

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

**USADA supports further guidance and instruction to certain groups of ASP and believes the minimum pool requirements should be revised to include not only sanctioned athletes, but ASP returning from a sanction. Given the difficulty in identifying ASP, it is our recommendation that there be further guidance around what is considered a “should” vs. “shall” within the guidelines and, at a minimum, should include anyone who receives a credential for major Games (this is one way to identify them more easily).**

**USADA also supports using evidence-based research and findings to identify who the most influential ASP are to better identify who should be prioritized in the education pool. There should be room left for ADOs to consider their unique sport system when identifying who should be in the pool.**

### **Caribbean Regional Anti-Doping Organization**

SUBMITTED

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

Just like the principle of strict liability, the responsibility for the education programme lies with the Signatory. To consider DTPs or other status organisations delivering education on behalf of a Signatory should not be contained within the ISE. The risk here is similar to that outline in the Recognition of Education Programmes Section; having to create mechanisms to evaluate the merits of these programmes (another layer or monitoring) and should be avoided.

### **Caribbean Regional Anti-Doping Organization**

SUBMITTED

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

Collaboration between Code Signatories and other sporting bodies is to be encouraged in anti-doping education delivery. However, it should be considered that establishing a framework in the ISE to vet, oversee or hold accountable other third-party providers might introduce a future/additional challenge for Code Signatories who have already outlined a challenge in the process of recognizing other existing education programmes. Guidance could be given to NFs and third-party providers to consider adopting programmes which exist in their operating environment (from the NADO, IF etc).

### **University of Birmingham**

SUBMITTED

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

Education managers described how organisations engaged in various strategies to share information, and these assisted with their implementation of the ISE. First, partnerships with other ADOs (e.g., Council of Europe, iNADO;



Penrose Club) were useful mechanisms for informal oversight of other organisations' education programmes. These partnerships involved pre-planned meetings and events (e.g., annual meetings) that often addressed high-level issues. Some organisations described how they had received mentoring from other larger ADOs, as well as mentoring other smaller ADOs. It was perceived that this was often beneficial for both the mentor and the mentee. Second, managers within ADOs used established networks with other ADO managers to share information (e.g., via a WhatsApp group). Such mechanisms were seen to be useful for troubleshooting day-to-day education delivery issues to find quick solutions to emergent issues (e.g., education delivery during Covid-19). There could be benefit in further encouraging oversight of other organisations' education programmes – through formal and informal mechanisms – within the ISE update.

### **Aston University**

SUBMITTED

Kris Lines, Senior Lecturer (UK)  
Other - Other (ex. Media, University, etc.)

There may be a risk of duplication here which a more harmonised system of accreditation might resolve? If a framework was implemented to establish minimum competencies akin to the quality assurance (QA) system that already exists in many educational establishments eg EQUIS / Triple Crown / AMBA etc, then this may reduce some of the oversight requirements. There would also then be a greater confidence that the educational competencies were being met. The annual running costs of this accreditation / QA system could be met through organisations wishing to benchmark themselves against this system.

## **Concept #6 – National Coordination of Organizations (29)**

### **International Taekwon-Do Federation ITF Vienna**

SUBMITTED

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

The ISE should be coordinated in each country taking into consideration the NADO's, government agencies, National Federations, etc., otherwise it will be chaotic with every body implementing different programs.

### **FEI**

SUBMITTED

Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)  
Sport - IF – Summer Olympic

I agree with the proposal, keeping in mind that due to prioritization between sports, depending on the sport it's very difficult if not impossible for IFs to ensure that NFs and NADOs work together. More responsibility should be placed on NADOs on this point.

### **ISU**

SUBMITTED

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

### **National Olympic Committee of the Republic of Kazakhstan**

SUBMITTED

Olzhas Togizbayev, Senior manager (Kazakhstan)  
Sport - National Olympic Committee

The National Olympic Committee of the Republic of Kazakhstan having considered the International Standard for Education informs the following. NOC Kazakhstan provides feedback on the Concept #6 of the International Standard for Education.

In case of Kazakhstan, NOC Kazakhstan works closely together with NADO in accordance with the international standard for education. NOC Kazakhstan provides assistance in compiling educational pools, coordinating and regulating work in this direction. NOC Kazakhstan under its zero policy to doping by general approval with the national sports federations have appointed responsible people on anti-doping work on types of sports of each

federation.

In preparation for multisport events, together with NADO, we provide a pool of athletes for anti-doping training. For example, for the 19th Asian Games in Hangzhou (China) made a list of athletes and worked together with NADO to provide information on key anti-doping issues. Some of the athletes completed ADEL (Anti-Doping Education and Learning) online anti-doping educational course on the WADA website and the other half of the athletes completed the Triagonal online anti-doping educational course on the NADO website, and individual work was carried out with all athletes.

#### **Botswana Football Association**

Boago Diphupu, Mr (Botswana)  
Sport - Other

SUBMITTED

good thinking

#### **UEFA**

Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

SUBMITTED

The athlete pathway and the sport system varies so much from country to country and sport to sport, we are concerned that specific guidance as to how the coordination should be managed could cause additional confusion.

#### **Swiss Sport Integrity**

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

SUBMITTED

- SSI agrees on the importance of coordination. However, the structures and roles may vary a lot from country to country. Therefore, it is difficult to develop a one size fits all proposal, but the coordination between the stakeholders is definitely an important issue.

#### **HADA (HELLENIC ANTIDOPING AGENCY)**

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

SUBMITTED

First, it is established that coordinating activities at an operational level has proved to be more perplexing when it comes to education programs implementation. Especially at the national level, the provision of high-quality education experiences along the athlete pathway has been unattainable when it comes to outsource the educator role to other partners, for whom the training needed, to become one, is not utterly and clearly described by the ISE, whilst concurrently they are not specifically required by the ISE to play such a role (e.g. NF representatives). To further elaborate, the Code (20.3.13) and the ISE (7.3.4) state that one of the responsibilities of the IFs is to "plan, implement, evaluate and promote antidoping Education in line with the requirements of the International Standard for Education, including requiring National Federations to conduct anti-doping Education in coordination with the applicable National Anti-Doping Organization.". However, this is not applicable in some cases, as the NADO bears the whole education program implementation responsibility whereas the NFs do not actively participate in it. Therefore, the education roles of all stakeholders and especially national partners (such as NFs, NOCs, and other bodies) should become more clear and precise both generally and along the athlete pathway, so that NADOs can implement their education programs effectively and also base their partnerships and outsourcing on more solid grounds, which will accordingly avail the national partners collaboration.

#### **Organizacion Nacional Antidopaje de Uruguay**

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

Although it is the central idea to strengthen the arrival mechanisms. Operational coordination requires a lot of time

and weakens the speed of access to an educational program that matches the school year and changes in anti-doping processes to reduce the number of athletes in training.

### **Dopingautoriteit**

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

In order to deliver education to the core target groups, Doping Authority Netherlands needs to collaborate with organizations that play a role in guidance for elite athletes (aspiring and actual). As Doping Authority Netherlands, we work with organizations including NOC\*NSF, Dutch sports federations and government agencies. However, Doping Authority Netherlands is the authority with respect to the content of educational activities and how they can be used. We think WADA should not aim to direct national coordination too much since the arrangements will differ from country to country.

### **Anti-Doping Agency of Serbia**

Bojan Vajagic, Director's Assistant (Serbia)  
NADO - NADO

SUBMITTED

The ISE established roles and responsibilities related to education for different Signatories. However, the most enforcement and activities come from NADOs.

Signatories' roles and responsibilities should be explained more clearly.

### **JADA**

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

Create "educate along the pathway" concept should more explicitly be expressed in ISE. If "from playground to podium" is a strong concept to sell, it should mention in ISE.

This is not only "transition" matter but it is a matter of extensiveness of reviewing one's sporting system. It would be good to review if Chapter 7 captures the possible responsible bodies at international and national levels. It is NOT feasible to make all target groups' responsibility for education sat with NADO. Although ISE 4.2.2 mentions "identify other agencies / organizations who may be responsible for delivering or have the potential to deliver Education", the role of ADOs' on those delivery bodies are not mentioned. Hence, we would suggest:

- NADO's roles can be mentioned in Chapter 7 when other bodies are assigned to deliver to certain target groups.
- Mention where the transition happens.
- NFs' role can be mentioned in Chapter 7, including promotion-level, youth athletes in pipeline and the roles of NOC/NPC - sending athletes abroad for Games/ continental events etc. and sharing the delegate (long) list with NADOs.

It would also be good NOT to have an overlooked target groups over whom have roles and responsibility by the relevant organisation, thus we should include the followings:

- Article 7.2.3: NADO should have a close cooperation with NFs in terms of educating youth and promotional/grass roots level (to whom NFs should be more responsible as a reach).
- Article 7.3.4 and Article 7.5.3: NFs are required to do Education in cooperation with NADOs along with the requirement by IFs and NOCs/NPCs. It could specifically mention about youth athletes/ASPs and the national teams to participate multi / single international events.

In a daily operation, it often happens that IFs and NOCs are just asking NADOs/NFs to deliver education activities (just relying on NADOs to do everything). It would be useful if a further guidance in ISE or Guideline is provided that more effective cooperation can be developed at more practical level (not just in a document based).

In Guideline, WADA should share good practices widely how and when transition along the athlete pathway can be coordinated at the national level by having a wide range of examples by NADOs. \* Please also see the comment in Concept #5 re. government role and high performance institution/ center.

It is mentioned that Signatories are encouraged to engage and leverage other relevant institutions such as governments, researchers and educational institutes as a part of ISE's third main objectives. It would be better to emphasize more about the importance of the engagement of high performance institution (like sport council of a country) and government who funds / invests for high performance sport and promotion of sport at grass roots.

#### **Drug Free Sport NZ**

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

We support this concept and further guidance would be beneficial. We know that NADOs carry out the majority of education around the world and therefore for this proposal to be successful we think this may require WADA to check that other signatories are fulfilling their ISE requirements.

#### **ONAD Communauté française**

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

ISE Article 8 requires that Signatories coordinate their activities and cooperate where necessary.

About the ISE Drafting group proposalsto review:

- Whether further guidance should be provided as to how and when transition along the athlete pathway should be coordinated at the national level between NADOs, government agencies, National Federations, and other bodies.

Further guidance or possible guidelines, why not. But again, it is important to remain flexible and not create additional requirements. The resources of the signatories are limited.

Another issue related to this point is that neither Governments nor FNs are Signatories.

#### **Anti-Doping Norway**

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

SUBMITTED

We think that further guidance on how and when the transition along the athlete pathway should be coordinated based on the national context between NADOs, government agencies, National Federations, and other bodies. The NADOs can develop this themselves based on experience and special adaptations to their program. However, non-mandatory guidance/resources could be welcomed as an inspiration for the national set-up.

#### **RUSADA**

Kristina Coburn, Compliance Manager (Russia)  
NADO - NADO

SUBMITTED

RUSADA supports establishment of guidance coordinating anti-doping education at the national level.

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

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

SUBMITTED

ISE 7.2.1 states that each NADO shall be the authority on education as it relates to clean sport within their respective country. The Austrian Federal Anti-Doping Act requires individual education plans for every national federation in coordination with NADA Austria. Only educators accredited by NADA Austria (or any other ADO) are allowed to deliver education that is recognized in the course of the education plan. NADA Austria conducts an annual evaluation of the implementation of the education plans and gives feedback.

NADA Austria must publish a summary of the evaluation in the annual report to the minister of sport and the Austrian parliament. If the requirements are not met, funding may be withdrawn by the ministry of sport.

This system is time consuming but has led to a much better harmonization of education activities in Austria and a better cooperation with the national federations. We believe that this approach might help many other NADOs to coordinate the national efforts, but this is too demanding for small NADOs. So this might only be a recommendation or something for the guidelines.

### **NADA India**

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

1.

The concept of National Coordination of Organizations is essential for ensuring that quality education experiences are provided along the athlete pathway. It is fit for the purpose of establishing coordination and cooperation among Signatories at the national level. The concept faces challenges in operationalizing coordination effectively, especially at the national level. Implementing the roles of Signatories and ensuring seamless transition along the athlete pathway can be complex in practice.

2.

Therefore, this concept should be more explicitly emphasized within the ISE to provide clear guidance on how and when transition along the athlete pathway should be coordinated at the national level. Clearer instructions can help address the challenges faced in practice.

### **Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

In Denmark we work based on the motto that The NADO is the anti-doping expert. we have knowledge about anti-doping content and best practices, and we have access to either internal educational resources (e-learning, seminars, webinars, leaflets or similar) or to external educational resources such as WADA's online educational resources. In the same way the NOC and the NFs are experts on their respective target groups. They know their target groups; they organise and lead their target groups. They have all contact information for the relevant athletes and ASP within their organisation and sport. When we combine these components; ADD's expertise and resources in anti-doping with NOC DEN's and NF's access to the target groups. Then we can reach our common goal and educate the right people at the right time.

Our collaboration is based on a high degree of trust. And it is crucial to have a clear collaboration agreement, including guidelines for roles, responsibilities, and potential outcomes of the collaboration. Regular communication and evaluations can help address any issues that may arise during the collaboration and ensure its success.

We acknowledge that this way of collaboration might not be the case for the sporting system around the world, and therefore some further guidance could be provided as to how and when transition along the athlete pathway should be coordinated at the national level between NADOs, government agencies, National Federations, and other bodies.

Another important thing is that the athlete's pathway can/will differ depending on the sport. This is equally true for para-athletes who can jump along the athlete pathway almost 'overnight'. Something we see often especially for the Paralympics.

### USADA

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

SUBMITTED

**This feels like an addition that can/should be added to the guidelines. By providing guidance on how and when, Signatories may be able to better cater to the educational needs of athletes.**

### Sport Integrity Australia

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

SUBMITTED

A key component of SIA's education strategy is the development of education plans with all NFs, which has significantly improved education uptake and reach at all levels of the athlete pathway and allowed for monitoring/evaluation by pathway cohort. This process, and a fortunate sporting landscape in Australia where delineation between competition levels is generally clear and consistent means that further guidance in this space is not required for our program, however we appreciate that many other signatories have sporting systems which would benefit from further guidance.

### Canadian Centre for Ethics in Sport

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

The concerns as defined in this concept strike the CCES as being outside the remit of the ISE.

The proposal is appropriate – providing *further guidance*, in the form of the Guidelines, sharing case studies, and/or research projects, about how Signatories can collaborate effectively with different levels to achieve the broadest possible catchment along the athlete pathway, consistent with the Signatory's resources and capabilities. This should be considered and explained to Signatories in clearer terms, and it should further emphasize the important role of values-based education at all levels and especially at early entry points in sport.

### UK Anti-Doping

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

SUBMITTED

■

The current guidance provides sufficient clarity regarding roles and responsibilities for our NADO, although operationally it is complex where a number of stakeholders are involved e.g. NADO, National Federations, IFs, National Olympic and Paralympic Committees and Commonwealth Games Agencies

■



Further advice and guidance would always be considered and welcomed, however, there is an awareness that this has to be compatible with a global Anti-Doping infrastructure.

■  
Consideration should be given to continental/regional organisations that are not Code signatories e.g. European Athletics, which mandate Anti-Doping education.

### Anti-Doping Sweden

Christine Helle, CEO (Sweden)  
NADO - NADO

SUBMITTED

#### Comments about *Event-Based Education* in general, and specifically in art 7.3.3 and 7.4.1-7.4.2.

The term and concept of *Event-Based Education* in ISE is not working properly in Anti-Doping Sweden's (ADSE) opinion. Also, there seem to be ambiguities about when to deliver Event-Based Education by Signatories. ADSE has in several occasions experienced that the writing recommending International Federations (in art 7.3.3) and Major Event Organizations (in art 7.4.1 and 7.4.2) *to deliver Event-Based Education at events* are read literally as a requirement that IF's and MEO's must deliver education activities during the event. Even though the writing in art 7.3.3 and 7.4.2 express that athletes and ASP shall receive education prior to the event, the Signatories interpretation of the ISE are that they shall deliver education in connection with events. This interpretation by some IF's and MEO's has resulted in Signatories expecting ADSE, as the Swedish NADO, to deliver lectures to athletes and athlete support personnel during international events (e.g. world championships) held in Sweden. We have for instance given lectures the evening before the opening of a championship and during the first days of championships.

In ADSE's opinion, it is not appropriate nor effective to educate athletes during an event or in the days prior to an event. Also, we have in several occasions experienced that only very few athletes and ASP are attending the lectures we have delivered during events. As stakeholders in elite sport we have to understand and appreciate that athletes want to put their energy in to their performance rather than anti-doping when they are attending international competitions. Athletes do not want and should not devote time and energy to educate themselves about anti-doping during events. The main principle in ISE is that athletes should be trained before participating in international competitions. It then becomes contradictory to simultaneously call for education at international competitions. Rather, all Signatories have to plan education activities for athletes during training periods and in connection with elite gatherings or camps to make sure the athletes are properly educated before they leave home to compete at international events.

ADSE proposes that the concept and writing on *Event-Based Education* in ISE be deleted or reworded so that it becomes a clearer recommendation and goal that all athletes should be educated well in advance of an international event. This can be achieved with good cooperation between all Signatories and a continuous focus on anti-doping education throughout the year.

### Caribbean Regional Anti-Doping Organization

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

SUBMITTED

No comment

### Caribbean Regional Anti-Doping Organization

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

SUBMITTED

The athlete pathway might differ across regions, as will the relationships among NADOs, government agencies and NSFs. There needs to be enough flexibility in the national coordination to allow for the dialogue between organisations. As is, the ISE framework allows for the variability in coordination. The challenges with coordination might be better resolved through CISP than more concrete 'guidance' in the ISE.

#### **Aston University**

SUBMITTED

Kris Lines, Senior Lecturer (UK)  
Other - Other (ex. Media, University, etc.)

I think this concept links back to Concept #3 - as to whether further guidance is needed as to the nature of the quality education experiences?  
Does this guidance already exist for other disciplines beyond doping - for example LTAD looks at transitioning by chronological age and performance level?

#### **University of Birmingham**

SUBMITTED

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

A challenge that two larger ADOs articulated was the quality assurance of education delivery by national federations. As with M&E practices for education delivery by ADOs, current assurance activities seem to predominantly focus on quantitative delivery metrics, such as session counts and participant numbers, with scant attention to the qualitative impact of education on athlete behaviour. One organisation notably monitors the engagement of 160 National Federations, and another 100+. This was viewed as being very resource intensive for larger ADOs, as well as indicating a significant gap in holistic programme evaluation. Development of recommendations to assist (larger) ADOs in their assurance activities could help with national coordination of organisations. Creating a working group to develop guidance on efficient and effective means of quality assurance of national federations as part of the ISE update could prove useful here, too.

#### **International Testing Agency**

SUBMITTED

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

We support a review and further expansion of this concept, to more precisely articulate regulatory expectations regarding cooperation among Signatories. In this context, it is recommended that the wording of ISE Art. 7.3.3 be changed from "this should be done" to "this can be done", which would appear more in line with the ISE objective of "Encouraging Signatories to cooperate with others and coordinate their Education activities to minimize duplication. Whilst minor, the use of "can" would imply a sense of flexibility. It would suggest that the recommended action is not mandatory but rather an option that Signatories may choose to adopt based on their specific circumstances and needs. This would align with the spirit of encouraging cooperation without imposing a rigid requirement.

### **Concept #7 – Broadening of the Education Pool (31)**

#### **International Taekwon-Do Federation ITF Vienna**

SUBMITTED

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

It is extremely important that the education pool should be broadened to include more categories of athletes and ASP. Signatories must include most, if not all, of their athletes.

#### **World Triathlon (ITU)**

SUBMITTED

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

Coordination should be done between the ADO for the Education Pool not to have the same athletes in the Pools.

**FEI**  
Catherine Bollon, Coordinator Athlete Legal Services and Human Anti-Doping (Switzerland)  
Sport - IF – Summer Olympic

SUBMITTED

I believe that anti-doping education should primarily be provided by national bodies as part of sport education curriculums, with an additional layer provided by the IFs for the athletes competing internationally. Also, I believe that the Code should make mandatory for NADOs and IFs to require anti-doping education as a condition for affiliation for athletes. For an IF it's difficult to obtain a political consensus from their members to vote this kind of rule.

**ISU**  
Christine Cardis, Anti-Doping Director (Switzerland)  
Sport - IF – Winter Olympic

SUBMITTED

ISE Drafting Group proposal to include more categories of athletes and ASP is a good proposal. Giving some criteria on how the Education Pool could be broaden would certainly help.

**Botswana Football Association**  
Boago Diphupu, Mr (Botswana)  
Sport - Other

SUBMITTED

yes

**UEFA**  
Rebecca Lee, Anti-Doping Team Leader (Switzerland)  
Sport - Other

SUBMITTED

We would recommend that athletes submitting testing pool whereabouts should also be included in the education pool. As per the ISTI, athletes submitting testing pool whereabouts must be tested at least once a year therefore, if we need to deliver on the 'education before testing' concept then they should be included alongside RTP athletes.

**Sport NZ**  
Jane Mountfort, Principal Policy and Legal Advisor (New Zealand)  
Public Authorities - Government

SUBMITTED

This submission is made on behalf of Sport New Zealand, which is the Crown agency responsible for advising the New Zealand government on anti-doping policy and ensuring New Zealand's compliance with the International Convention against Doping in Sport 2005.

New Zealand's National Anti-Doping Organisation is Drug Free Sport New Zealand (DFSNZ). DFSNZ operates an education pool that includes over 3000 national-level athletes. The DFSNZ education pool therefore captures a much larger group of athletes than the mandatory RTP and return from sanction group.

An extension of the populations covered by the mandatory education pool may be consistent with DFSNZ's current practice and may not therefore have significant resourcing implications. However, this would depend on the scope of any extension. We note that smaller ADOs in other jurisdiction may be less able to manage any extension within their existing resourcing.

Careful drafting of any extension to the education pool would be critical to provide clarity on the group to be captured.

We would want to reserve a final position on any extension until we have had the opportunity to consider more specific proposals when they are available and assess the implications for DFSNZ.

## Swiss Sport Integrity

SUBMITTED

Jonas Personeni, Director of Prevention & Communication (Switzerland)  
NADO - NADO

- SSI strongly agrees on this point! In the past, there have been many athletes that are defined as ILA but have not received education by the IF, which is very problematic regarding testing and also TUE.

## HADA (HELLENIC ANTIDOPING AGENCY)

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

HADA believes that this is the most crucial concept among those which are being reviewed upon the 2027 ISE update. Broadening the mandatory target groups of the education pool would ensue a greater amount of transparency in the sports regime. Furthermore, this would also facilitate the effort of those who bear the responsibility to provide adequate and up-to-date antidoping education to an already wide and vague education pool. As an aftermath it would confine any person's right -who is uninterested or unwilling to participate and is currently not included in the mandatory target groups- to evade any kind of antidoping education activity and eventually make them get submitted into one. We think that this amendment has the potential to be an imperative tool for a subsequent immaculate sports environment.

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

We believe it would be a good thing to encourage signatories more to broaden the education pool and provide them with more guidance in this area. However, the ISE was established relatively recently and, in our opinion, it is too early to make the broadening of the education pool mandatory.

## SLOADO

SUBMITTED

Nina Makuc, education coordinator (Slovenija)  
NADO - NADO

Suggestion for additional target groups that are mandated:

- ASP working with RTP athletes and athletes returning from sanctions
- athletes and ASP competing/participating at major events
- athletes and ASP competing/participating at major events for youth

## JADA

SUBMITTED

YaYa Yamamoto, Director (Japan)  
NADO - NADO

Although we agree on "Broadening of the Education Pool", some ADOs (small ADOs: Tier3-4) may not be able to meet the requirements of ISE if/when Education Pool gets broadened.

The starting point, therefore, would be with the ASP of athletes in a RTP/TP/Other Pool and those returning from sanction; they should definitely be included in an Education Pool.

We also agree to have a guidance or direction to identify the most influential ASP to include them in an Education Pool. It is often difficult to coordinate at a national level with those organisation to certify coaches. Hence, setting an additional minimum of Education Pool (for example) with the national coaches for Olympics/Paralympics and continental Games would be good.

Since many IFs have some coaching certification programs for ASP, it can be a consideration to include those coaches (who would be certified by IFs) as IF's Education Pool. Identifying the appropriate education objectives for all levels / categories of ASPs (including medical doctors, pharmacists, parents) are challenges (although WADA published the curriculum). This can be mentioned in the Guideline or possibly to consider publishing a curriculum.

### **Drug Free Sport NZ**

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

We agree in concept, and at DFSNZ we already go beyond the minimum requirements of returning from sanction athletes and RTP athletes.??

We believe that informing ADOs of, and discussing with them, who they should be educating, and why, is a better approach than enshrining these details in updated rules and requirements.

Again, need consideration around potential funding issues and implications for smaller/less-resourced ADOs.

### **ONAD Communauté française**

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

Currently, the mandatory pool for education consists of the RTP and athletes returning from a sanction.

The ISE Drafting Group wonders whether the population that are mandated to be included in the education pool should not be broadened to include more categories of athletes and ASP.

Again, there could be recommendations or guidelines on this matter.

On the other hand, it is necessary to remain flexible and not create additional requirements, given the limited resources of most signatories.

On the background, priority groups may also vary depending on the nature of the signatory. An IF would have it easier/it would make more sense, that they train support staff and coaches where NADOs could have a focus on parents or doctors. This therefore refers to the necessary flexibility that must be demonstrated in this area, without adding additional requirements for ADOs.

### **Anti-Doping Agency of Serbia**

Bojan Vajagic, Director's Assistant (Serbia)  
NADO - NADO

SUBMITTED

This concept is fit for purpose. Requirements should be increased within the currently mandatory groups as well as newly added pools.

Suggested groups to be add as mandatory:

1. TG (The Code defines this pool separately than RTG, however this group has simillar antidoping requirements as RTG in practise).
2. National team players

The incorporation of the term mandatory should be explained in a practice, given that there are difficulties in the implementation of mandatory education. Defining possible consequences for the athlete if athlete does not want to pass mandatory antidoping education.

## **RUSADA**

Kristina Coburn, Compliance Manager (Russia)  
NADO - NADO

SUBMITTED

RUSADA proposes to mention a new education pool: athletes and ASP receiving a sanction.

RUSADA developed and introduced a separate education program for this education pool in addition to a program for athletes and ASP returning from a sanction. It is crucial for such athletes and ASP to understand their rights, what are restrictions and consequences of violating these restrictions during the period of disqualification.

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

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

SUBMITTED

The education pool of an ADO is closely related to the resources available. Many IFs focus on top level athletes participating in their international events, NADOs – in general – have a broader focus.

There are many ADOs who are still struggling to fulfil the requirements of the current ISE. The new ISE will only come into force on January 1st, 2027 so there is still some time for improvement, but demanding too much will have to be done with caution.

### ***List of target groups***

ISE 4.3.2 states: "At a minimum, Signatories shall include Athletes who are included in their Registered Testing Pool and Athletes returning from a sanction." One future requirement might be to educate the coaches of these athletes. Or the mentioning of certain important target groups that need to be considered and where a rationale as to why they have not been included needs to be provided.

So instead of leaving everything open as it is right now in the ISE, there could be a list of target groups that should be included in the education plan unless the ADO has a rationale why this is not possible. For the list of target groups see also comment on Concept #3 "Education Report"

### ***Education before testing***

To really live up to this concept, ADOs must conduct coordination meetings with testing department. There should be a check if a target group, that the testing department is considering, was already educated. This requirement would help to prevent unintentional ADRVs, but limits the flexibility of the testing programs.

## **COCOM**

Stephanie Sirjacobs, Legal adviser (Belgium)  
NADO - NADO

SUBMITTED

Vu la jeunesse du SI, il pourrait être intéressant de laisser le groupe obligatoire comme ça et d'établir une liste (par ordre de priorité ou non) de catégories de personnes qui pourraient être éduquées. Premièrement parce qu'avec le groupe "restreint" actuel, vous constatez que beaucoup de Signataires vont plus loin -> si vous augmentez l'obligatoire, risque que tout le monde n'arrivera pas à suivre. Les groupes prioritaires peuvent aussi varier selon la nature du signataire. Une FI aura plus facile/ça aurait plus de sens, qu'elle forme le personnel de support et les



coach là où les NADOs pourraient avoir un focus sur les parents ou les médecins.

### **NADA India**

NADA India, NADO (India)

NADO - NADO

SUBMITTED

1.

The concept of broadening the Education Pool is essential for expanding the reach of anti-doping education and ensuring that a wider population of athletes and ASP receive education. It is fit for the purpose of reducing the risk of doping across various categories of individuals.

2.

The concept has translated into practice by increasing education activities and expanding the reach to larger populations. However, there is a challenge in ensuring that certain athletes and ASP, who are not mandated to be educated, are not disregarded, even if they are at high risk of doping.

3.

Therefore, by creating a tiered system within the Education Pool, where different categories of athletes and ASP are identified and assigned education requirements based on their level of risk to doping. High-risk individuals would receive more comprehensive education, while lower-risk individuals would receive less intensive but still relevant education.

In summary, the concept of broadening the Education Pool is essential for comprehensive anti-doping education but requires clearer guidance and increased requirements within the ISE. Implementing unique and inclusive solutions can help ensure that high-risk individuals are reached and educated effectively.

### **Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

SUBMITTED

As mentioned under the feedback to concept #6 we already in Denmark conduct education planning with our NOC and our National Federations. This means that we have a very large education pool that goes far beyond the current requirements in ISE. This is positive! But it is also worth to acknowledge that we in our work depend highly on the NOC and NF's engagement in the educational work and their desire to support their athletes and ASPs for their best.

Whether it is possible to expand the education pool to a wider population of athletes depends on the access to the athletes and what is possible from a system perspective. In education we work with cohorts while in testing we work with individuals. We depend on the access to the cohort.

What we do believe relatively easy can be implemented is a more specific definition of ASPs in order to reach the closest connected coach/team leader (please see feedback to #4).

### **USADA**

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

NADO - NADO

SUBMITTED

**USADA believes the minimum ISE requirement for return from a sanction should be extended beyond athlete to include ASP returning from sanction. Other than that, USADA believes the mandate should remain the same, and ADOs should have autonomy to add desired requirements based on their unique**

sport system.

### Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

The need for anti-doping training is probably greater for athletes at a lower level. And as mentioned the ASP.?

For this reason, the NADOs should be encouraged to offer training or awareness-raising to athletes at a lower level. At the same time, however, we are hesitant towards putting in place requirements of monitoring activities at this level, as it will require a lot of resources, which could be better spend at education and prevention activities. Thus, these groups should probably not be defined in the Education pool, but covered by a requirement of making information and education available to the group.

### Sport Integrity Australia

SUBMITTED

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

Sport Integrity Australia would be supportive of expanding the education pool to athletes and ASP outside of those with the most contact with the anti-doping system. This is a practice currently undertaken in the SIA education program, via the use of NF education plans and large focus on emerging athletes and those competing at a level with any exposure to anti-doping testing.

In particular, the requirement for education on return from a sanction should be extended to ASP in the ISE at a minimum.

### Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

Signatories must define an Education Pool. If the Signatory does not have access to Athletes and Athlete Support Personnel within their Pool, or lack jurisdiction to educate those audiences, then they may not be appropriate to include within the Education Pool in the first place. This is a scoping problem; the Education Pool must reflect the resources available to the Signatory and our reach should not exceed our grasp to the point that effective education to the Pool is impossible.

Similarly, if the Signatory is aware of groups that are at high risk of doping, who may be subject to testing, or are under the jurisdiction of their local anti-doping program, then they are already bound – via Article 4.3.4 – to justify why those athletes are being excluded from the Education Pool.

In WADA's review of Education Plans through the audit process, it would be worthwhile to see if there are patterns emerging of excluding high-risk audiences from the Education Pool, who those athletes are, and what justifications exist for their exclusion.

High-risk athletes should be prioritized. Athletes likely to be tested should be prioritized, consistent with an "education before testing" principle. The Athlete Support Personnel who work with them should be prioritized.

If anything should be prioritized or clarified within the ISE, it is the following:

- The Education Pool must be defined in accordance with the jurisdiction, resources, and capabilities of the Signatory, and
- Not all Activities need to be delivered in the same way to all groups within the Education Pool.

Low-risk, far-upstream athletes do not require anti-doping education in the same way that a high-risk RTP athlete

competing in international events does. Perhaps access to information and awareness-raising is enough for that group. A talented athlete on a high-performance path can and should have a different emphasis than either of those groups, with appropriate Activities – according to the resources and capabilities of the Signatory to provide – delivered to them. Ultimately, this too strikes the CCES as a challenge in implementation, rather than a gap in the Standard itself.

### UK Anti-Doping

SUBMITTED

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

■

As a NADO, this is an ongoing challenge to ensure that we embrace the principle of 'education before testing'. There is overall agreement with the principle to widen the pool, however NADOs would have to carefully manage this, for NADO/RADOs with limited resource.

■

The success of implementing a wider education pool for some ADOs will be through their Sport Federations and professional (ASP) bodies, therefore the relationships between the ADO and these stakeholders will be central to the successful implementation of this concept – linked to concept 5.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

The education pool of most small ADOs (Tier 4) is wider than the RTP athletes stipulated in the ISE simply because their potential RTP athletes might already be covered by an IF. However, the consideration to include a broader section of athletes is welcome and might simply need to stipulate RTP, International Level and National Level athletes.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

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

At present, it is not felt that the list of mandatory groups should be broadened in the ISE in general. Some Code Signatories already cover wider groups, while an increase in the number of mandatory groups might exacerbate the current human and financial resource challenges already facing some Signatories. However, further guidance could be provided to Code Signatories desirous of expanding their specific pools, outlining additional potential target groups; or guidance for identifying what could be deemed an 'at-risk' group in the respective country or operating environment.

### SEARADO

SUBMITTED

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

Athlete pool. The emphasis now is on RTP in the ISE. Need to include National Athletes, TP athletes and others slated for testing.

### University of Birmingham

SUBMITTED

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

No relevant themes have been identified for this concept to date, but they are likely to be identified during our next stage of analysis when we analyse the interviews with ADO staff, and/or the one following that when we interview athletes and ASP.

### Aston University

Kris Lines, Senior Lecturer (UK)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

Could this be differentiated so these wider groups were included within an education pool, but at a lesser level? This would mean that they were still exposed to the core concepts / obligations, but not at the same level that an RTP athlete would be?

This would also help to reduce the burden on signatories as while they were expected to deal with an increased level of education, this would have less resourcing impacts for them?

### International Testing Agency

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

SUBMITTED

We support the concept and recommend to place particular emphasis on the definition of categories of Athlete Support Personnel to be mandatorily included in the education pools.

## Other Comments / Suggestions (20)

### International Taekwon-Do Federation ITF Vienna

Frank Diaz, AD Education Officer (Spain)  
Sport - IF – Other

SUBMITTED

We need ore tools for the ISE and a specific program to train educators and help maintain a high standard.

### World Rugby

Ross Blake, Anti-Doping Education Manager (Ireland)  
Sport - IF – Summer Olympic

SUBMITTED

**P4 - 1.0 (d) Encouraging Signatories to engage and leverage the resources and expertise of others, including governments, researchers and educational institutions.** Is this point significant enough to be an objective? Or could it be worded better? It would seem quite an obvious point that could be moved elsewhere.

**P8 - 3.3 Anti-Doping Education: Delivering training on Anti-Doping topics to build competencies in clean sport behaviors and make informed decisions.** The 'and make informed decisions' part here is not 100% clear grammatically. It would seem better as: "and help the recipient to make informed decisions"

**P8 - 3.3 Education Plan: A document that includes: a situation assessment; identification of an Education Pool; objectives; Education activities and monitoring procedures as required by Article 4.** Should this be "learning objectives" for consistency.

**P8 - 3.3 Education Pool: A list of target groups identified through a system assessment process.** Are we clear on the differentiation between 'target groups' and 'education pool'? Why would you identify a group as a target and then leave it outside the education pool? Is this rationale entirely clear in the ISE and if it's needed, could it be made clearer.

**P8 - 3.3 Educator: A person who has been trained to deliver Education and is authorized by a Signatory for this purpose.** We would suggest the addition of the word "accredited" here somewhere as well as authorised. 'Authorised' would seem to mean less in terms of quality control.

**P10 - PART TWO: STANDARDS FOR EDUCATION Anti-Doping Education: Delivering training on Anti-Doping topics to build competencies in clean sport behaviors and make informed decisions.** We would consider changing the title to "Anti-Doping skills". The repetition of 'education' in the first and fourth bullet points have always stood out a bit as being a bit in conflict and a bit circular, given how often the term 'education' is used in the document.

**P10 - PART TWO: STANDARDS FOR EDUCATION All components should be aligned in the Education Program. All activities should be complementary, underpinned by values, and foster and protect the spirit of sport.** We're not sure what this paragraph adds, if anything?

**P10 - 4.1.1 Signatories shall document their Education activities through an Education Plan. The plan shall be provided to WADA and other Signatories upon request with an overview/summary in English or French.**

We would consider that the distinction between the education plan and the education programme may need clearer definition in the document.

**P11 - 4.2.1 System Assessment: Signatories shall describe the environment within which they operate, including the sports system/structures and the national/international context.** We wonder whether this requirement could probably do with more explanation - perhaps identifying what the purpose of the system assessment is?

**P11 - 4.2.2 Identification of Target Groups: Signatories shall list all potential target groups for their Education Program, primarily Athletes and Athlete Support Personnel. Signatories shall also identify other agencies/organizations who may be responsible for delivering or have the potential to deliver Education.**

The word 'primarily' doesn't help here. This should be clear in terms of what should and shouldn't be included.

**P12 - 4.3.5 Other Target Groups: In addition to Athletes and Athlete Support Personnel as described above, other target groups should also be considered as part of the planning process including, but not limited to:** Are 'target groups' really needed as a term? Can we not just say "you may wish to consider the following groups for inclusion in your education pool".

**P12 - 4.3.5 Commercial sponsors** This would seem potentially redundant - is anyone really looking to formally educate commercial sponsors?

**P14 - 5.9 Signatories should include Athletes in the planning and development of the Education Plan to ensure activities are appropriate for the stage of development of the Athletes. Signatories should consider involving Athletes in the delivery of Education activities where appropriate.** Examples of how co-production of educational programs with athletes could/should be done is important. We need to ensure that we're not just adding an athlete's name as tokenism. Parameters to guide sports to successful co-production would be helpful.

**P14 - 6.1 Signatories shall evaluate their Education Program annually. The evaluation should inform the following year's Education Plan. The evaluation report shall be provided to WADA upon request with an overview/summary in English or French.** Should we not require that this is published in the same way that a testing report is required annually? Why would we not require this if the equivalence of education and testing is the same?

**P18 - 8.1 (a) Signatories shall consult with other relevant Signatories when planning Education activities.** This is very vague and could perhaps do with some more detail as to what is meant?

#### Other General Comments

We consider it imperative that we start to develop an athlete education passport in ADAMS to help avoid duplication. Education should be held to the same standard as testing. This would also help with ensuring athletes have a full education history and would prevent duplication and education fatigue.

The standard may need to acknowledge education fatigue (though this may be something for the ADO to do themselves when defining their athlete pathway and education priorities). Older IL athletes can get to the age of about 25 and have been bombarded with education (which can be repetitive by nature given the cost of developing materials which means they need to last a few years). This links to the passport idea stated above, that once we know an athlete has received a certain number of (WADA approved/compliant) e-learning and FTF sessions in their career this could then make certain education non-mandatory. They clearly need to still receive updates, and repeat education from time to time, but this may help with fatigue, and disassociation with education in general.

#### ISU

SUBMITTED

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

In assessing the implementation of the ISE, the resources and circumstances of each stakeholder must be taken into account, and flexibility must be shown. For example IFs and NADOs have not the same access to athletes and language is a barrier that should be taken into account.

#### Botswana Football Association

SUBMITTED

Boago Diphupu, Mr (Botswana)  
Sport - Other

The standards for Education should be international to prevent future problems.together we can, together we will.

#### SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (Souoth Africa)  
NADO - NADO

Consider adding to: - "Risks of supplement use" - include doping risks of using unregulated substances, such as CBD/THC products

### **HADA (HELLENIC ANTIDOPING AGENCY)**

SUBMITTED

Dimitris Braoudakis, Education Manager (GREECE)  
NADO - NADO

1. Another point of emphasis is the fact that the main education of people's lives, which is the school years, does not include a very important course in its curriculum, whereas the antidoping education does, according to article 18.2 of the code. What we are referring to is morals, ethics, and principles (values based education). Even though they are intangible concepts, they shape our lives and the way we lead them. It is a common practise to neglect and diminish the importance of including them in education as a self-sufficient course, under the naïve point of view that these concepts can be embedded into anything, and they are implied whenever the requisite occurs. However, the code has outlined these concepts as a distinct course and the need to treat it as the most important subject in our outline is greater than ever. We should find ways to make this chapter more intriguing to our audience, as we think that the biggest challenge we face in our education programs is the magnitude of effect we have on their already instilled moral code. We should find ways to sensitize them and make their minds think. We should find ways to trouble them and make them wonder and put positive "what ifs" in their heads and make them linger. That's why we need each other and also need to work as a team on this. We believe that this is our biggest challenge and should we overcome this, the sports landscape will unequivocally improve.

2. All colleges / universities with sports science bachelors should incorporate a mandatory antidoping course in their curriculum. In other countries some have already done this, but all should follow. This would be more attainable if an international legislation was constituted instead of leaving it to each institution's discretion.

### **Dopingautoriteit**

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

1. We find it difficult to determine the exact distinction between the 'education program' and the 'education plan'. These two terms are used interchangeably. In our view, the ISE (and the accompanying documents) are not clear enough in this regard.

2. The principle underlying the ISE is: education prior to doping controls. At the same time, the only obligation incumbent on signatories is to include athletes in the RTP, and athletes returning after a sanction, in the education pool. However, these athletes will already have undergone doping controls in the past. We see this as an area involving contradiction.

3. We would like to receive more direction/guidance with respect to collaboration with commercial parties such as the ITA. They are not a signatory but they are very active in the field of education. How can we manage this factor? And who monitors the educational activities of organizations of this kind?

4. We think it would be beneficial to provide more clarity on the four components and how they should be aligned in the education program.

### **Anti Doping Danmark**

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

We'll propose to change the wording in the ISE from parents to guardians in order to be more inclusive of athlete family dynamics



**JADA**

YaYa Yamamoto, Director (Japan)  
NADO - NADO

SUBMITTED

Two important terminologies can be defined for helping the daily practices, for gaining financial resources and for communicating and getting understanding by stakeholders:

- Clean Sport - this should be included values-based and integrity of sport component -- if included, we suggest to include in the Code.
- Clean Sport Education - values-based anti-doping education

Consistency between the Code and ISE is necessary, including Purpose (strategic area), Article 18.

Education Programs can be 'evidence-informed' as opposed to 'evidence-based'.  
ISE 5.6 can also mention about Protected Person (not only as Minors).

**Drug Free Sport NZ**

SALLY LOWE, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

In general, we are concerned that introducing too many additional mandatory requirements will see a 'gold standard' achieved by a handful of larger and greater resourced ADOs and a widened gap with those that are smaller/less resourced that may struggle with increased requirements.

The focus on proposed reviews looks to include increased regulations to drive consistency, but we believe it would be better to have clearer definitions, guidelines, resources, and templates and these will be a far better way to achieve this.

**ONAD Communauté française**

Julien Magotteaux, juriste (Belgique)  
NADO - NADO

SUBMITTED

As explained in the concepts document for this Standard, it was introduced in January 2021.

This standard is therefore recent. It is clear that it has led to an increase in the financial and human resources of ADOs.

As a result and consistent with our general remarks on this overall update, this is a key area where a thorough impact assessment should be carried out before or in parallel with any proposed changes.

If new requirements are to be proposed, they should be accompanied by a correlative impact assessment both on financial and human resources.

Without prejudice to this necessary prior impact assessment

- Is this Standard fit for purpose? A priori yes, but this tool remains recent.
- Does it translate into practice as intended? The same: it's too soon to answer.
- Should it be more or less emphasized within the ISE? It's soon to answer, but generally speaking, it is an area and a Standard that must remain flexible.

Should it have increased or decreased requirements? Same answer, the instrument is still too new to be able to be fully evaluated. But again and in general, this Standard is already very detailed and already provides for numerous requirements in an area which must remain flexible. Given this need for flexibility, the trend would in any case not be towards an increase in requirements.

## **SLOADO**

Nina Makuc, education coordinator (Slovenija)  
NADO - NADO

SUBMITTED

1) Following suggestion for additional target groups there should be a change in wording in Part three, Article 7 Roles & responsibilities of Signatories

- IFs, Major event Organizers and National Olympic Committees shall mandate education of all participants in advance of the event (starting with youth category) (Article 7.3.3; Article 7.4.2; Article 7.5.2)

Comment to this suggestion: if this would be the case it would be necessary to set clear recognition criteria. Additionally, IFs, Major Event Organizers and National Olympic Committees should clearly define for which events education is mandated (e.g. publish on their website (or share in some other way with their respective stakeholders) the date and the name of the event at least one year ahead). Furthermore there should be a time limitation - for example participants shall be educated in the last year before the event.

2) Suggestion for adding an article about Athletes and athletes support personnel roles and responsibilities for education (or adding it to the Code in the article 21.1 and Article 21.2):

Since one of athletes' rights is a right to education (Athletes' Anti-Doping Right Act, point 7) it should also be their responsibility. I suggestion adding an article about Athletes (and athletes support personnel) roles and responsibilities for education (or adding it to the Code in the article 21.1 and Article 21.2) - Responsibility to participate in education programs provided by an Anti-Doping Organisation (or by signatories)

Additional for ASP:

- To use their influence on Athletes and encourage them to participate in education programs

- To cooperate with anti-doping organisations (signatories) in delivery of education programs (Comment to this – many times ADOs need to schedule a delivery of education program with ASP and many times ASP are not cooperating or making excuses that their schedule is too busy etc.)

## **Sport Integrity Australia**

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

SUBMITTED

Parents could be reworded as parents/guardians for inclusivity.

One key stakeholder in Australia, Paralympics Australia, also provided the following additional feedback regarding accessibility and inclusion. Much of this could be considered across the full spectrum of the Code and International Standards:

1. The language of the ISE and wider WADA resources are considered to require a high level of literacy. Easy read and digital support versions of the resources are recommended to support understanding in people with low levels of English literacy (eg non native English speakers, persons with intellectual disabilities etc).

2. Content should also be universally designed to support access for people with print disabilities or other print preferences (eg vision impairment, dyslexia, non-neurotypical etc).

3. The ISE should consider mandating that education plans and subsequent resources consider the accessibility of the content, delivery techniques and mode of education to suit the specific needs of the target group eg web resources developed in accordance with WCAG standards. We appreciate the ISE CISP resources do encourage multiple modes of education, but additional requirements need to be identified when the above listed impairments are present. This can be reflected in several aspects of the ISE some examples may include: A. Concept 2 – When mandating the knowledge and competencies of educators there should be an aspect to include considerations for development of content and facilitation for persons with an impairment. B. Concept 7 – Where relevant the standard should encourage Education Plan to include key persons in Para-sport i.e., Guides, Pilots and Classifiers.

C. Concept 7 - Also, consideration for athletes who are underage and athletes who lack legal capacity requiring legal guardian with completion.

## Canadian Centre for Ethics in Sport

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

### Values-Based Education

The general tone around values-based education continues to emphasize it as a specific separate activity which is most appropriate for younger athletes, whereas we firmly believe that values-based education can and should be a component of clean sport education at all ages and stages.

### Article 5.5 – Accessibility

It is unclear whether Article 5.5 goes far enough in ensuring that learners with impairments or learners with different learning preferences (formerly *learning styles*) are represented here.

### Article 5.9 – Centering the Athlete Voice

It is similarly unclear whether this article goes far enough. That an education program “should” involve athletes may need to rise to the level of “shall.” There are many ways to include athlete voice in a program’s development and delivery, and many of them are not burdensome requirements. At the very least, it should be a requirement of the Education Plan to identify how, why, and where athlete voice is included in developing and delivering Activities.

## USADA

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

SUBMITTED

International Standard of Education 2021 Comments:1.0 - Introduction and Scope (Pages 4 and 5)-b) Encouraging Signatories to cooperate with others and coordinate their education activities to minimize duplication.-c) Encouraging Signatories to consider the benefits of educating a wider population through Values-Based Education programs to instill the spirit of sport and foster a clean sport environment.-d) Encouraging Signatories to engage and leverage the resources and expertise of others, including governments, researchers and educational institutions. Consider changing all 3 of these to “signatories should” instead of “encouraging signatories” to stay consistent with language throughout the document. For c) consider the following “through a broad range of educational approaches to include values based education to instill the spirit of sport and foster a clean sport environment” Instead of “population through Values-Based Education programs to instill the spirit of sport and foster a clean sport.”

3.0 - Definitions and Interpretations (pages 5 and 9)-Consider adding the definition of spirit of sport-Values-Based Education: Delivering activities that emphasize the development of an individual’s personal values and principles. It builds the learner’s capacity to make decisions to behave ethically. There is an extra space between values-based and education and then again after the :Consider changing this definition to read "delivering activities that emphasize the identification, development and/or refinement of individual's" This is in order to consider that learners could be at various phases of values based learning.

4.0 - Planning an Education Program (pages 10 and 11)-To develop their Education Plan, Signatories shall undertake the following steps: assess the current situation; establish an Education Pool; set clear objectives and related activities; and outline monitoring procedures. Consider adding evaluation to monitoring procedures “monitoring/evaluation procedures”-As defined in the Code, the following groups shall be considered as part of this process: coaches, trainers, managers, agents, team staff, officials, medical/paramedical personnel, parents or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competition. Anywhere it says “parents” it should say “parent/guardian” to be more inclusive

5.0 - Implementing Education Programs (Pages 12 and 13)-Values-Based Education should remain a focus,

particularly in children and youth through school and/or sports club programs, and in cooperation with the relevant public authorities and other stakeholders. Consider adding “where possible” between club programs and in cooperation with-Testing procedures, including urine, blood and the Athlete Biological Passport, Consider adding to dried blood spot-Requirements of the Registered Testing Pool, including whereabouts and the use of ADAMS, No other resource is named (e.g. speak up for reporting doping) and some organizations do not use ADAMS for whereabouts filing).

7.0 Roles & Responsibilities of Signatories (Page 15)-Each National Anti-Doping Organization shall be the authority on Education as it relates to clean sport within their respective country. National Anti-Doping Organizations should support the principle that an Athlete’s first experience with anti-doping should be through Education rather than Doping Control. Consider adding “expert” to read “expert authority”-Each National Anti-Doping Organization shall devise an Education Program for those under their authority and who are in their Education Pool. National Anti-Doping Organizations shall document an Education Plan to demonstrate how their Education Program will be implemented and monitored. National Anti-Doping Organizations shall evaluate their Education Programs annually. Consider changing to “jurisdiction” instead of “authority.”

### **Caribbean Regional Anti-Doping Organization**

SUBMITTED

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

It is noted in the Executive Summary that "The impact of the ISE is currently being reviewed and analyzed through the Code Compliance Questionnaire (CCQ) exercise". The findings mentioned related to an increase in financial and human resources. However, as the CCQ for Tier 4 countries has not been issued as yet; there is the concern that the detailed considerations of/implications for this grouping might be overlooked. This is important as Tier 4 countries are somewhat heavily evaluated based on education-related areas.

### **Caribbean Regional Anti-Doping Organization**

SUBMITTED

Sasha Sutherland, Executive Director (Barbados)  
NADO - RADO

Athletes mandated to be in a testing pool are not always under the jurisdiction of smaller ADOs so to have a robust programme, evaluated and monitored, for other tiers of athletes is a requirement that might need some tailoring to meet the resource capabilities of those ADOs.

New challenges can arise from the CCQ responses of Tier 4 countries; where the ISE has major implications and where there are more resource challenges for implementing the standard.

Otherwise, great job to the team thus far. Looking forward to seeing if any of the proposals change after receiving the Tier 4 country CCQ responses next year; since any proposed change to the ISE might have a greater impact on those programmes.

### **SEARADO**

SUBMITTED

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

Role of RADOs (7.6)Present articles include 'support', shall work'..... this does not provide any cloud or bite for the RADOs. We can support... they (NADOs) can agree but not follow up

### **University of Birmingham**

SUBMITTED

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

The previous comments as well as those that follow below, are based on the initial findings from interviews with Education Managers from six ADOs conducted as part of the WADA-funded social science research project “Evaluating the Impact of the WADA International Standard for Education (ISE) at the Global and Anti-Doping Organisation (ADO) Levels”. The next stage of analysis will include the interviews with other ADO staff, as well as athletes and ASP who have received education since the ISE was implemented. The themes that follow below are ones identified as part of our initial data analyses that don’t fit within the earlier categories.

## Translation and Cultural Considerations

Implementation of the ISE by some organizations was complicated by language issues. First, the ISE, guidelines, and support materials are only in a limited number of languages. This creates obstacles to comprehension of the ISE for some. Second, this affects delivery and raises the possibility of nuanced messages being distorted when delivered by someone who does not have fluent English/Spanish/French. It may be possible in the future to utilise machine learning approaches that can efficiently and effectively translate the ISE and associated supporting documents for organisations that do not have English/Spanish/French as a core language.

In addition, cultural considerations were recognized by organizations as potentially helping or hindering ISE implementation. In one case, this had been capitalised on by linking the vision for education with the national culture which has the potential to facilitate engagement and effectiveness. Others saw culture as a barrier though, describing how the ISE doesn't account for cultural differences across the globe (exemplar quote, "Your instruments are restraining us"). That some have successfully incorporated cultural values within their delivery of the ISE shows this is not necessarily a barrier though, so allowing for and encouraging cultural nuances in education delivery could be incorporated within the upcoming update of the ISE. To assist here, WADA could provide examples of how some organisations have capitalised on cultural differences to make the delivery of education – still within the ISE framework – culturally relevant.

## Compliance Mindset

Although the ISE was embraced by organizations and the value of education endorsed, many organizations in their efforts to meet the requirements of the ISE adopted a compliance mindset. This manifested in ways beyond the programming-requirement matching exercise described under Concept #1. While the ISE guidelines emphasize setting a vision for educational programming, several organisations relied on one of the underpinning principles of the ISE, that education should come before testing, as the basis of their vision. This has resulted in a narrow focus that characterises these visions more as tactical objectives rather than strategic foresight. That is, rather than contemplate their own vision they adopted an existing ISE principle. What was described in these cases was not really a vision, but more an objective derived directly from the ISE. At times, this has even led organisations to urgently deliver education to individuals who were due target testing to make sure this requirement was met. Redirecting organisational efforts from mere compliance towards optimisation and demonstrable efficacy of education should be a principal objective in the forthcoming update of the ISE.

A small number of organisations had taken a more thoughtful approach, embedding their national cultural nuances into their visions. Additionally, the vision of one organisation was also informed by their own social science research. This culturally tailored perspective not only distinguished their programme from others, but also enhanced its pertinence to the educational beneficiaries. Such an approach, which elevates the vision beyond mere compliance to a strategic enabler of cultural integration, is exemplary and should be emulated.

## Organisational Resources and Capabilities

Our findings also suggested a need to account for differing resource, legislative, and political environments that different ADOs work within (in terms of how the ISE should be implemented/evaluated). Some organisations have limited funding that is meant to cover all of their roles (e.g., testing as well as education) which clearly limits what education can be provided around competition time. Also, some organisations receive their funding from different sources, which can limit what they are allowed to do (e.g., one education team was not allowed to be involved with whistleblowing detection because of funding constraints). Still, organizations, regardless of size or funding levels, struggle with resources, and being bigger or having more funding was accompanied by greater responsibilities (e.g., delivery to a larger athlete pool), negating any presumed advantage. Moreover, larger organisations have to deal with increased organisational complexity and diverse programming delivery. Some organisations did report creative approaches to ISE implementation, particularly when the ISE was built from the ground up and new programming developed, rather than matching existing delivery to the ISE requirements (see Concept #1). Providing cases studies for organizations of different sizes could help ADOs develop creative and effective approaches to education delivery within their specific resource constraints.

## Knowledge Development

Knowledge generation strategies were employed by some, primarily relating to social science research. Some organisations described how they had commissioned their own social science research to address key issues they faced, such as developing their organisational vision. Some organisations had an internal budget for social science research, whereas others sought funding from the WADA social science research grant scheme to fund research projects. Others described how they had identified specific research groups whose work they relied upon. Finally, some organizations either did not engage with – or questioned the utility of – social science research to aid their education delivery. Thus, further encouragement of engagement with – or even commissioning of – social science research within the ISE update may be beneficial.

## Desire for, and Resistance to, ISE Updates.

When asked, there were very few specific suggestions for ISE revisions/updates from education managers. In fact, some suggested it should remain as it is so that organisations can focus on delivering what it requires of them. This

again seems to reflect a compliance mindset, fearing that if the ISE is updated then they would need to change what they were doing in order to meet the updated requirements. Implicit within the interviews analysed to date though is the need to emphasise and more formally mandate the need for a focus on maximising education effectiveness – as opposed to mere compliance – going forward. This would be facilitated through strengthening of monitoring and evaluation by facilitating greater understanding of it and providing enhanced support for it through clear explanations of intent and guidance. Future compliance exercises should ideally require evidence of education effectiveness so this can be evaluated globally as well as within specific regions.

### **International Testing Agency**

SUBMITTED

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

- Evaluate whether any addition to the mandatory subjects outlined in ISE Art. 5.2 is necessary to ensure the continued coverage of crucial topics that effectively mitigate the risk of anti-doping rule violations. This may include topics pertaining to correlated integrity and ethical challenges, promoting a more holistic approach.
- Assess the practicality of allowing athletes the option to request their International Federation (IF) or National Anti-Doping Organization (NADO) to require mandatory education activities for their Athlete Support Personnel (ASP) as a preventive measure, which shall be implemented by the concerned ADO.
- Further explanation of the concept of values-based education for adult athletes would be welcome.
- consider making clearer the difference between clean sport education and anti-doping education.
- consider incorporating examples or further practical guidance (including via the ISE Guidelines) of how to tailor education activities to learners with impairments or specific needs.