

## INTERNATIONAL STANDARD FOR EDUCATION (ISE) Consultation - First consultation phase

**Showing: All (128 Comments)**

### PART ONE: INTRODUCTION, CODE PROVISIONS AND DEFINITIONS (15)

#### International Floorball Federation

SUBMITTED

Merita Bruun, Anti-doping Manager (Finland)  
Sport - IF – IOC-Recognized

General feedback on the ISE:

- ADOs should have the freedom to decide how to best organise the education activities. I believe for example, that the IFs know best themselves what approach is best for which international event. There is no idea to run very broad education activities at all international events as the events differ a lot. At some events there are national teams, others are for club teams (lower level), some events are only 1-2 day events, others 10 days, some involve only 1 IF staff members etc. etc. Also the same athlete might participate in a number of international events within a short period of time.

- What is also very essential is to listen to the athletes (or other target group). Involve them in the planning process, because it is important to have them motivated. This is somehow mentioned in annex B, but could perhaps be communicated more. For example athletes commission members should be included in the planning process and evaluation as they represent the voice of the athletes and at the same time it is a group that the IFs/ADOs have ongoing contact to.

#### World Rugby

SUBMITTED

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

#### 1. General comments:

i. Firstly, we consider the creation of this standard to be a step in the right direction towards giving education and prevention the platform and prominence it merits as part of the overall fight against doping in sport.

ii. Some of the wording of the document is very complex with long clauses/paragraphs. We appreciate that there is a need to retain the stylistic consistency with other WADA International Standards (and of course the inclusion of points like Code references are accepted), but as it is one of the few Standards not directly intended for scrutiny by legal experts, it may risk being overly impenetrable for educators less familiar with such documents.

iii. Although they are not Code signatories, there's no mention of regional federations in the document. Many fulfil an educational function for athletes in their region, so some reference to their inclusion (when suitable) in education planning may be helpful.

iv. Even more emphasis could perhaps be placed in the document on research both as a means to understand the target audience at the outset, and then to evaluate the efficacy of an intervention. Otherwise despite the excellent guidance in the document, we (the ADO educators as a group) may still risk spending money on education that misses its target. This advice may perhaps be better suited to a guidance document than the Education Standard, but emphasising somewhere the simplicity of cheap and simple on-line sampling packages and the potential benefits of link-ups with local universities to assist with analysis may increase the likelihood of money being spent wisely and the good framework/ideas in the Standard bearing fruit.

#### China Anti-Doping Agency

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

As part of models of best practice of the Code, the Information and Education Guidelines to Prevent Doping in Sport has been implemented since 2016. Therefore, it is recommended to incorporate the Guidelines into the International Standard for Education.

### Gouvernement du Canada

SUBMITTED

Francois Allaire, Agent Principal de Programme (Canada)  
Public Authorities - Government

The Code must not only recognise and facilitate the implementation of the new International Standard for Education but also embed it within the introduction of the Code. The role of education as part of a comprehensive and integrated response to doping alongside testing and investigations needs to be emphasized throughout the Code.

### Council of Europe

SUBMITTED

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

#### General comments

- The ISE draft version 1.4 is largely and broadly accepted at concept and principle level.
- A general observation is the use of [Comments] within the ISE and consideration could be given to refining or indeed including some of the comments text in the actual Standard.
- Consistency of terminology should be improved to aid understanding.

When developing, the Council of Europe proposals for the ISE, the following principles were applied:

**Principle 1** - The main purpose of the Code is to serve as the basis for clean sport environment through prevention, bearing in mind that:

- a) prevention consists inter-connectedly of education, deterrence, detection and enforcement;
- b) Code and International Standards' language needs to focus on positive outcomes (rather than fight against doping).

**Principle 2** - Scope and mechanisms for coordination of education activities between different Signatories needs to be clarified, in order to maximise reach and minimise duplication. NADO's as the natural cross over point between sport and public authorities should act as the central, national coordinators.

**Principle 3** - Roles and responsibilities of all stakeholders responsible for education must be considerably enhanced.

**Principle 4** - The importance and responsibility of the athlete support personnel has to increase.

**Principle 5** - Quality assurance process and specific indicators are needed for measuring effectiveness and impact of education within the anti-doping system.

**Principle 6** - Clearly defined testing pool (or specific education pool) as the target group for compulsory education with the view that if an athlete can be tested they should be informed;

**Principle 7** - Consequences be applied as part of the Code Compliance process for ADOs if anti-doping education is not being implemented.

**Principle 8** - To help implementation of anti-doping education, ISE should be accompanied with guidelines, explanations, model programs, tools and templates. The Council of Europe offers to help WADA in developing those.

### Antidoping Switzerland

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

ADCH supports the introduction of the International Standard for Education (ISE). It is important that all stakeholders of the sporting world commit to play an active role in education athletes on antidoping. While it is important to have certain guidelines on how to implement and conduct an education program, it is also important not to have too rigid requirements and thereby restrict ADOs in their freedom to run their education program. The best way to educate athletes depends on the sport and will vary heavily from country to country. Education is not one size fits all, therefore there must be the flexibility for ADOs to tailor their education programs specifically to their target audience in their target country.

### Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)

NADO - NADO

SUBMITTED

- Thank you for the opportunity for the first consultation on 1st ISE. We feel that the ISE will become the most important document for the World Anti-Doping Program. With this in mind, we have made an extensive consultation internally and also with the JADA Athlete Committee members. We set up the JADA's ISE Working Group and met to discuss the contents of ISE and its applicability and feasibility when it is accepted.

- Overall, the first draft is well thought through considering the very 'minimum standard' for Education, which will be mandatory field for all ADO. However, it would be necessary to make the ISE more understandable as possible.

- There are some concerns, however, regarding the definitions and clarities on the descriptions in the ISE. There are some terminologies missing when we consider the significance of the world of sport at the moment and the future, especially the wording like "integrity" / "integrity of sport". It would be ideal that anti-doping/doping can be related to a wider integrity matter of sport therefore the overall 'integrity' in sport/through sport can be protected and promoted.

- More clarities in prioritisation/target with the required program/activities as minimum are necessary. Implementation strategy can be specified in the Information/Education Guideline. However, the ideal and realistic pictures should be well combined and balanced in ISE.

- Balance between the ISE and Guideline where the practical implementation should be maintained.

- Given the ISE is the mandatory field of World Anti-Doping Program, it is important to state/clarify that if AAF occurs, the degree and depths of Education Program cannot be argued for by the Athlete concerned during the Result Management procedure. For example, this Athlete cannot argue for his/her AAF if an ADO missed covering any of the topics stated in 4.3.2.

<ISE Overall x Code>1. In the Code, it would be ideal to mention what "minimum requirement" in Information/Education Programme means, which we think will be reflected on the Code compliance matter. Understanding "minimum standard" can be specified one way or another, an Education programme or Education Plan seeking for "maximum" could also be illustrated. 2. Evaluations

How do we / are we evaluated on Education Plan/Program which is planned/prepared by ANOs?

If we keep the door open to NADO/IF and their specifies/resources, how can we ensure education "Quality" (at least minimum)? It would be preferable to avoid the objectives of Education Plan is based on "numbers".

The Quality standard should be mentioned both in the Code and ISE. 3. Stages of implementation

At the implementation stage, it would be better to set some phases of implementation based on the ISE. 4.

ADRV / AAF case against Education deliverable

It is preferable to mention in the ISE if an Athlete with AAF could argue against being not educated (the answer is no we think). 5. ADO requirement for compliance

It would be better to specify (possibly in Guideline) that the minimum requirement can be met when an ADO can submit its Education Plan which describes their 'coordination' role for ensuring the National Federations to develop and implement the Anti-Doping Education Programme (meaning, the ADO are not the direct deliverer but NFs take responsibility of establishing Anti-Doping Education Programme for their sport, and for this, the ADO provides the structure and support).6. Roles of Athletes / ASP in Education

It would be good to describe the roles of Athletes and ASP in Education to require them to ensure the positive/ values-message are delivered by athletes to athletes and to ensure athletes engagement in

Education. 7. Individual vs Team - given it is the individual's responsibility to complying with the Code, educating the 'team' as a whole as target group should be mentioned in the ISE. 8. Athlete engagement and the role of role model athlete and the possible programme areas can be mentioned in the ISE in light of their right.

### Anti-Doping Norway

SUBMITTED

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

Anti-Doping Norway agree with the increased emphasis on education and welcome an International Standard for Education. Please note that several suggestions relating to Education have been addressed in the Code-hearing.

Experience indicate that by using a positive approach applying words like "clean" is more acceptable to all then words like "anti-doping". A quick search on ADOs websites identity "clean sport" more often. "Anti-doping" tends to be hidden behind and underneath other sources. WADA is using words like "play true", "fair play" and "parents' guide to support clean sport" etc. With this in mind Anti-Doping Norway suggest replacing wording such as "anti-doping education" to "clean sport education".

### Drug Free Sport NZ

SUBMITTED

Sian Clancy, Education Manager (New Zealand)  
NADO - NADO

We are supportive of the introduction of an International Standard for Education (ISE). There is inconsistency, and therefore potential confusion, between responsibilities of ADOs, NADOs and Signatories throughout the ISE.

### Anti-Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Scientific Manager (Netherlands)  
NADO - NADO

On behalf of the four Dutch stakeholders, being the Ministry (Health, Welfare and Sports), the NOC (NOC\*NSF), the Athlete's Committee, and the NADO (Dopingautoriteit).

We would like to refer to the specific and detailed comments made by the Advisory Group on Education of the Monitoring Group of the Council of Europe.

### Anti Doping Denmark

SUBMITTED

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

#### General Comments

Prevention is an overall terminology. Prevention consists inter-connectedly of education, deterrence, detection and enforcement. We suggest prevention is addressed as such in the introduction of the Code, throughout the WADC and the ISE.

It is important to focus on a positive language and positive outcomes (protect clean sport rather than fight against doping). The general suggestion is that the positive wording is considered in the WADC and the ISE.

The phrase "Other Person" is used throughout the WADC and ISE. 'Other person' could be anybody not necessarily covered by the WADC. We suggest using the wording "Athlete Support Personnel". The phrase will refer to a range of 'other persons' supporting the athlete. In continuation the importance and responsibility of the athlete support personnel has to increase.

Clear definition of the target group for education. The phrase "testing pool athletes" must change to "education pool athletes" with reference to the target group prioritized for education by the NADOs in

accordance with the minimum standard. The “education pool athletes” shall include athletes in the RTP and athletes competing at international events.

To help implementation of anti-doping education, ISE should be accompanied with guidelines, explanations, model programs, tools and templates.

Comments Associated with Version 1.4 of the proposed International Standard for Education

We support The Advisory Group on Education of the Monitoring Group of the Council of Europe contribution, and thereby have the following general comments.

The ISE draft version 1.4 is largely and broadly accepted at concept and principle level.

A general observation is the use of [Comments] within the ISE and consideration could be given to refining or indeed including some of the comments text in the actual Standard.

Consistency of terminology should be improved to aid understanding.

## PART ONE: INTRODUCTION, CODE PROVISIONS AND DEFINITIONS

We support The Advisory Group on Education of the Monitoring Group of the Council of Europe contribution, and co-proposes the proposal of changes to the draft International Standard for Education. There might occur minor adjustments by ADD to the proposed text

### Introduction and scope

P4, paragraph 6, The phrase “testing pool athletes” must change to “education pool athletes” with reference to the target group prioritized for education by the NADO’s. (general comment)

### Code provisions

Comment (pages 5 – 8): We support The Advisory Group on Education of the Monitoring Group of the Council of Europe contribution, and co-proposes that once the proposed text for a new Article 18, and additional comments and proposals for other Code Articles that relates to Education have been reviewed, these would then replace the existing Part 2.0 of the ISE.

### 3.0 Definitions and interpretation

The definition and associated text that refers to ‘Athlete’ should match the same text included in Article 18.

The definition for Athlete Support Personnel be amended:

*Athlete Support Personnel:* Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person treating or assisting an athlete to improve sports performance or preparing for competition.

#### 3.2.1 Prevention

This text should match the text proposed for the Code as it relates to the term Prevention and how that is defined.

#### 3.2.2 Education

The 1-5 list of education activities should be reordered to better reflect the degree to which they impact on learning.

*Awareness* – highlighting topics/issues within the framework of anti-doping such as values, why it is important to prevent doping, key terms and messages. Normally conducted as campaigns or by social media, to promote, support and reinforce a clean sport environment as the only accepted standard.

*Information* – providing accurate, and up to date anti-doping material directly related to Article 18 of the Code, and how to access further reliable information from websites or Apps as examples.

*Communication* – establishing channels that allow the learner to exchange information, and engage with the education program, or be officially updated on changes within the wider anti-doping system.

*Values-Based Education* – (no changes to text)

Anti-Doping Education – (no changes to text)

The definition for Mutual Recognition should be considered to be removed to be consistent with other parts of the anti-doping system where mutual recognition exists such as TUEs.

We propose the concept of Mutual Recognition be moved to the actual ISE text, Article 5.3.

The definition of Prevention should be amended to reflect the proposed new definition of prevention.

The definition of Testing Pool should be altered and reframed to Education Pool:

**Education Pool:** The identified pool of athletes and athlete support personnel as defined by an ADO for the purposes of the Education Program that as a minimum shall include national-level and international-level athletes, athletes part of a Registered Testing Pool.. Prioritization of such athletes and athlete support personnel within the Education Pool to be targeted should be justified as part of the Education plan.

[Comment – WADA has a range of education tools for ADOs to use to meet the requirements of the ISE for all priority target groups.]

#### 4.2.4 Current Situation Assessment

proposed text

*Risk Assessment:* ‘.....This will provide directions for content emphasis as well as indications of those most at risk of and vulnerable to doping who will be considered as most in need of Education. An assessment of the wider.....’

In the paragraph ‘Target Groups’ we propose the wording is amended.

*Target Groups:* The Anti-Doping Organization must seek to quantify target groups within their jurisdiction and to identify the stakeholders who could assist with access or engagement to such target groups. This will include recording the overall number of *Athletes*, *Athlete Support Personnel* and other relevant *Persons*, including those stipulated in Article 18 of the *Code* and outlined in 4.2.5. This will help to establish the scale in which the Anti-Doping Organization’s Education Program will be delivered in order to set realistic goals and to prioritize them based on risk in accordance with the Anti-Doping Organizations (sporting) environment.

#### 4.2.5 Prioritization of Target Groups

The term Testing Pool should be replaced with the term Education Pool throughout the Article. Reference should be made to ADO’s having to provide a rationale for the prioritization of target groups.

Proposed Text (Insert into the first paragraph): ‘..... In terms of prioritizing target groups who will be the focus of the Education Program, the Anti-Doping Organization should consider the assessment process conducted in Article 4.2.4 and have a clear rationale as to why such target groups have been prioritized.’

Comment (page 19): We propose that the second paragraph be amended to be consistent with the revised definitions of athlete support personnel proposed and consistent with the priorities as set out in Article 18 of the *Code*. In addition, we propose that target groups out of the WADC jurisdiction are excluded from the WADC. They may be included in the ISE or the Guidelines

Proposed Text: ‘...As per Article 18.2 of the *Code*, it is the Athlete Support Personnel’s’ duty and responsibility to support the fostering of a clean sport environment, and inform and counsel Athletes on ethical sporting practice, and anti-doping rules and procedures pursuant to the *Code*. Anti-Doping Organizations shall within their means, ensure that Athlete Support Personnel are well informed to the standards required to counsel their Athletes accordingly. This is an effective investment of resources as they will continue to counsel all Athletes who come under their authority. Athlete Support Personnel of Education

Pool athletes and Athletes who compete at International Events shall be educated, in priority order, as per Article 4.3.4. In the first instances this refers to the coach and medical personnel. For younger athletes, parents and teachers should be the next priority.

In addition to the target groups stated in the definitions of Athlete and Athlete Support Personnel in Article 3.1, specific target groups shall be considered as part of the Education Program as outlined in Article 18 of the Code include;

- Youth Athletes
- Sports Science personnel
- Sports Officials
- Team Managers
- Agents

#### 4.2.8 Monitoring.

Reference to qualitative research should be made.

Proposed Text: ‘.....This monitoring should include documented qualitative feedback, and quantification of the Anti-Doping Organization’s Education activities” such as reach and impact metrics. Further guidance on conducting monitoring is provided in the Guidelines for Education. The monitoring.....

#### 4.3 Implementing effective Education

4.3.2 The Anti-Doping Organization shall include the following topics in their Education Program as outlined in Article 18.2 of the Code:

Proposed Text

- Principles and values associated with clean sport
- Athletes rights and responsibilities
- Consequences of doping including health, social, psychological effects and the case management process
- Anti-doping rule violations
- The prohibited list, including in- and out-of-competition periods
- Risks with medications and supplements, including health consequences
- TUEs
- Testing procedures
- Requirements of a registered testing pool, including Whereabouts and use of ADAMS
- International competition (for those attending a major games or international sporting event)
- Speaking up to share concerns about doping
- Importance of anti-doping and its governance, including jurisdiction

#### **UK Anti-Doping**

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

SUBMITTED

#### **GENERAL COMMENTS:**

- Reference to how education programmes should and could be adapted for Athletes with impairments needs to be strengthened. Further guidance should be provided in the revised Model Guidelines.
- WADA should operate a mutual recognition process to enable all ADO's to have WADA approved programmes, whereby ADO's looking to apply mutual recognition can do so fairly and easily. Monitoring of that quality should then form part of the Compliance Audit process, undertaken by WADA.
- Link should be made between Athlete Charter (if approved) and the ISE as it relates to the 'Right to education'.
- Somewhere and possibly not in the ISE, clarity on what Whereabouts information is needed for non-RTP athletes attending a Major Games should be outlined in the Code to avoid further inconsistencies in approach and systems used to gather such information. There should be a consistent standard for all Major Games, should such information be essential to collect.
- Linked to the above, a timeframe by which the anti-doping rules associated with a Major Games should be published should be set. We suggest this should be as a minimum 12 months prior to the start of the Games for which they apply.

### **Kamber-Consulting**

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)  
Other - Other (ex. Media, University, etc.)

#### General:

The draft is too long and is overregulating education. Instead of focusing on effects on the ground that are based on cultural, lingual and regional differences it tries to put a "one size fits all" approach on education. It is proven that such an approach will only crate more administration, bureaucracy and will deviate the already today too scarce resources in anti-doping education from real measures to help athletes and their entourage to administrative measures.

The current draft is a mixture of an IS and a Guideline. Therefore, anti-doping needs no such a ISE but rather good Guidelines (or Best Practices). Such a Guideline for Education is foreseen and should be elaborated without IS. The provision in the Code under article 18 (education) and a relevant Guideline for Education is enough to help anti-doping organizations.

The ISE does not take into account different school and tertiary education systems and different responsibilities for educating the athletes' entourage in a country. Therefore, an ADO will mostly not be able to influence such education as requested in the current art 4.2.5 or 5.2.1.

### **International Paralympic Committee**

SUBMITTED

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

General:The draft is too long and is over regulating education. Instead of focusing on general principles that can be adapted based on cultural, lingual and regional differences, it tries to put a "one size fits all" approach on education. It is proven that such an approach will only create more administration, bureaucracy and will deviate the already today too scarce resources in anti-doping education from real measures to help athletes and their entourage to administrative measures.

The current draft is a mixture of a Guideline and a Best Practice. Therefore, and education standard should only provide the guidelines and minimum requirements of an education programme (as can be seen with testing in the ISTI).

### **Institute of National Anti-Doping Organisations**

SUBMITTED

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

General comment. Great care must be taken to ensure that this document is drafted and presented in a manner which shows it to be helpful to, and manageable by, a NADO (the type of organisation to which it is most applicable). While we can not base it on the lowest common denominator it must be pitched at a level which encourages and enables NADOs to embark on its full implementation with a sense that its goals can be achieved over a reasonable time frame.

## 1.0 Introduction and scope (7)

### China Anti-Doping Agency

Zhaoqian LUAN, . (China)  
Sport - Other

SUBMITTED

The International Standard for Education claims to have minimum standard. Many signatories will be assessed whether they have enough resources to develop the minimum standard of anti-doping education. For those who cannot meet the minimum standard, it is recommended that WADA provide appropriate support to help them reach the requirement of the minimum standard as soon as possible.

### Department of Health - National Integrity of Sport Unit

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

SUBMITTED

The ISE states that the objective of education is to 'prevent the intentional or unintentional use by athletes of prohibited substances and prohibited methods'. Australia is of the view that the aim of education should not be constrained to just the physical act of 'use'. There are other violations in the Code, for example complicity and administration, and the aim of education should be to prevent all breaches of the Code.

It would be beneficial if the ISE expressly stated two separate aims of education:

- o Improving understanding of violations to prevent breaches of the Code (informing); and
- o Changing behaviour to prevent the use of prohibited substances and methods (influencing).

### Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

#### 1. Specificities of Objective

- If the descriptions of the ISE objective is kept in the line as "practice-focused solutions and seeks to provide clear guidance on what Signatories shall and should do in order to meet the minimum standard", it would be preferable to give a little more clarity on what "minimum standard" means.
- The mandatory field of Education should be given for clarity.
- "more prescriptive standard" is better clarified.
- prioritising and targeting "Testing Pool Athletes and Athletes competing at International Events as well as their Support Personnel" is referred here as the prioritized target and a "minimum standard". There could be mis-understanding on the wording of "Testing Pool Athletes" which can be defined by ADOs in various ways.

There is also a mis-conception that testing is first, then education is next.

- "...while also requiring minimum standards for all Persons referred to in Article 18 of the Code" - description in the Art 18 Code is not clear. It would be better to specify what "minimum standards" mean herein and if this is related to the Code compliance matter. Since "Media" for example is included here, it would be a huge task for many of ADOs to ensure reaching the Media.
- Since the target group for Anti-Doping Education (both rules- and values-based) is wide, realistically all the target groups cannot be reached for many of ADOs. Therefore, it would be better to highlight and specify the prioritisation of target groups as well as prioritisation of education contents (both knowledge/ information-based) and the process of prioritisation and the required approach at minimum.
- "...focus efforts initially on Athletes who are already within the anti-doping system" - would this be related to the meaning on targeting "Testing Pool Athletes and Athletes competing at International Events as well

as their Support Personnel"? It would be better to specify what "Athletes who are already within the anti-doping system" means.

Prioritisation can be illustrated along with the 'athlete development pathway', possibly such examples can be provided in Guideline.

- It would be better to specify what "to complement the Testing program" mean and how does this look like (possibly in Guideline). It would be better to avoid the 'impression' that Testing is first considerations then Education next.

2. Objectives depending on Signatories (NADO, IF, Event Organiser and also target groups) can be mentioned - this can be specified in Guideline if not in ISE.

3. Conceptual separation between the "Rules-based INFORMATION" vs "Values-based EDUCATION" used in 2015Code can be better adapted/ used in ISE.

<Suggested changes>- Outcome of Education should be widely defined with future perspectives and societal scope

The outcome of the Education Program (both rules-based and values-based) should be set broadly. The outcome should be specified like fostering / developing the "role model in sport and in society" and "character building for role model in society". Avoid a narrow focus on the objectives in anti-doping, which will minimise the significance of Education Program given the Code itself is overweight to Testing anyway.

## NADA Austria

SUBMITTED

Alexander Sammer, Head of Legal (Austria)

NADO - NADO

We propose the number of changes to the WADC in order to be consistent, we place them here as well.

Changes in the WADC:

Definitions

We propose to implement the definition for Anti-Doping Activities of the ISCCS into the WADC since it is a good definition and summary of our activities:

"Anti-doping education and information, test distribution planning, maintenance of a Registered Testing Pool, managing Athlete Biological Passports, conducting Testing, organizing analysis of Samples, gathering of intelligence and conduct of investigations, processing of TUE applications, results management, hearings, monitoring and enforcing compliance with any consequences imposed, and all other activities related to anti-doping to be carried out by or on behalf of a Signatory, as set out in the Code and/or the International Standards."

Introduction of the Code

We propose the following Draft Text:

"The ultimate goal of the Anti-Doping System is to preserve the spirit of sport and to help foster a clean sport environment.

There are four Prevention strategies that encompass all the strands of an Anti-Doping Program.

Education – Awareness, Information, Communication, Values Based Education and Anti-Doping Education

Deterrence – to divert potential dopers, through ensuring that robust rules and sanctions are in place and salient for all stakeholders.

Detection – an effective testing and investigations system not only enhances a deterrent effect, but also is effective in catching those committing Anti-Doping Rule Violations, while also helping to disrupt anyone engaged on Doping behaviour.

Enforcement – to adjudicate and sanction those found to have committed ADRVs.”

These four Prevention strategies set the framework for the wider Anti-Doping System.

#### 10.12.1 Prohibition against Participation during ineligibility

We propose the following Draft Text:

“...other than education or rehabilitation programs or another defined activity that is agreed by the ADO, the sports federation or equivalent organization and the athlete.”

[Comment to Article 10.12.1: Athletes and/or Athlete Support Personnel returning to sport after a period of ineligibility should be made aware of current anti-doping information, such as the Prohibited List and Code changes to prevent the recurrence of an ADRV. This should be the responsibility of the prosecuting organization unless delegated upon agreement to another ADO.]

#### Article 18 Education

We propose the following Draft Text:

##### **“18.1. Principle and Primary Goal**

**The main principle for Education Programs is to actively contribute to the Anti-Doping System as one of the four prevention strategies intended to preserve the spirit of sport and to help foster a clean sport environment as described in the Introduction to the Code.**

The primary goal of Education is to raise awareness, inform, to instil values, develop life skills and decision-making capability to promote clean sport and to prevent intentional and unintentional Anti-Doping Rule Violations.

All Signatories, shall within their scope of responsibility (as defined in Article 18 and Article 20 and Article 21) and in cooperation with each other, plan, implement, monitor and evaluate Education Programs in line with the principles set out in the International Standard for Education (ISE) to protect clean sport.

##### **18.2. Education Plan**

Each Signatory shall develop and implement an effective, intelligent and proportionate Education Plan that prioritizes appropriately between sports, disciplines and categories of target groups and starting with a risk assessment, setting of clear objectives, documenting an action plan for implementation and monitoring and evaluation procedures all in compliance with the requirements of the International Standard for Education. Each Signatory shall provide WADA upon request with a copy of its current Education Plan.

##### **18.3. Program and Activities**

Any Education intervention as part of Information and Education Programs of a Signatory shall be delivered by a trained and authorized person according to the responsibilities in the International Standard for Education.

Signatories shall, at least annually, publish publicly a general statistical report of their Information and Education Programs, with a copy provided to WADA. WADA shall, at least annually, publish statistical reports summarizing the information that it receives from Signatories.

#### 18.3.1 Information Programs

Information programs shall, at a minimum, provide Athletes and Athlete Support Personnel identified as highest priority according to the Education Plan with updated and accurate information on at least the

following issues as defined in the International Standard for Education:

- Principles and values associated with clean sport
- Athletes rights (in general as they relate to the Charter of Athletes Rights)
- Consequences of doping including health, social, psychological effects and the case management process
- Anti-doping Rule Violations
- The Prohibited List, including in- and out-of-competition periods
- Athletes and Athlete Support Personnel rights and responsibilities (as they relate to specific Anti-Doping Activities)
- Risks with medications and supplements, including health consequences
- TUEs
- Testing procedures, including urine, blood and the biological passports
- Requirements of a registered testing pool, including Whereabouts and use of ADAMS
- Speaking up to share concerns about doping

Importance of the anti-doping System

### 18.3.2 Education programs

Education programs shall be delivered according to the Education Plan and be directed especially at young Athletes and different other target groups as defined in the ISE. These programs shall promote the

spirit of sport in order to establish an environment that is strongly conducive to clean sport and will have a positive and long-term influence on the choices made by Athletes and Athlete Support Personnel.

Education programs should follow educational principles and focus on the levels of learning that each target group will need to achieve in order to be fully competent in each topic. They should

- be tailored to the target population, ensuring content and delivery are appropriate
- include interactive activities, allowing the learner to engage with the concept of with what is being taught, including case studies, scenarios,
- aim at developing core Life-Skills
- run over a period of time where key messages are repeated and reinforced,

include multi-modal communication, with consistent and simultaneous messages coming from different sources, such as home, school, club or community.

#### **18.4. Coordination and Cooperation**

Information and Education Programms shall be coordinated by the NADO at national level or if applicable the RADO, working in collaboration with their respective national sports federations, NOC, NPC, Governments and wider educational institutions. This coordination should maximize the reach of education programs across sports, Athletes and Athlete Support Personnel and minimize duplication of effort.”

#### **Article 18.3. Professional Codes of Conduct**

We propose that this article is repositioned and further clarified.

Our view is that 18.3 is trying to reflect the following two points:

1.

That Codes of Conduct should be in place, working in collaboration with relevant professional associations.

2.

That sports organizations should ensure that they have relevant disciplinary procedure in place should, as an example, an anti-doping organization have insufficient evidence to prosecute an anti-doping rule violation, but there is sufficient evidence to bring a disciplinary procedure. Equally, sports organizations much ensure they have sufficient polices in place to remove and sanction those from their sport when required.

In light of the above, we propose that Article 18.3 in its current form is clarified and point 1 is moved to Part 3 of the Code, and point 2 is moved to the Roles and Responsibilities section, since Codes of

Conduct are not necessarily an Education specific topic.

#### Article 20.1 Roles and Responsibilities of the International Olympic Committee

We propose the following Draft text:

“20.1.9 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.1.10 To actively encourage NOCs to ensure that Athletes and Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Olympic Games they aim to attend.

#### Article 20.2 Roles and Responsibilities of the International Paralympic Committee.

We propose the following Draft text:

“20.2.9 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.2.10 To actively encourage NPCs to ensure that Athletes and Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Olympic Games they aim to attend.”

#### Article 20.3 Roles and Responsibilities of International Federations

We propose the following Draft text:

“20.3.12 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.3.13 To require National Federations to develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### Article 20.4 Roles and Responsibilities of National Olympic Committees and National Paralympic Committees

We propose the following Draft text:

“20.4.11 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.4.12 To require National Federations to develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### Article 20.5 Roles and Responsibilities of National Anti-Doping Organizations

We propose the following Draft text:

“20.5.8 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### Article 20.6 Roles and Responsibilities of Major Event Organizations

We propose the following Draft text:

“20.6.7 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### Article 20.7 Roles and Responsibilities of WADA

We propose the following Draft text:

“20.7.6 To promote, conduct, commission, fund and coordinate anti-doping research and to support education through the development and promotion of anti-doping tools, resources and programs.”

#### Article 21.1 Roles and Responsibilities of Athletes

We propose the following Draft text:

“20.1.2 to actively participate and engage in Information and Education Programs of a Signatory”

#### Article 21.2 Roles and Responsibilities of Athlete Support Personnel Athletes

We propose the following Draft text:

“20.2.2 to actively participate and engage in Information and Education Programs of a Signatory”

#### Article 21.3 Roles and Responsibilities of Regional Anti-Doping Organizations

We propose the following Draft text:

“20.3.6 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.3.7 To require member countries to develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

### **Anti Doping Denmark**

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

SUBMITTED

Introduction of the Code.

COMMENT – proposed text.

The ultimate goal of the anti-doping system is to preserve the spirit of sport and to help foster a clean sport environment.

There are four prevention strategies that encompass all the strands of an anti-doping program.

- Education – to raise awareness, inform, communicate, to instill values, develop life skills and decision-making capability to prevent intentional and unintentional anti-doping rule violation as well as reform and rehabilitate in cases of transgressions.
- Deterrence – to divert potential dopers, through ensuring that robust rules and sanctions are in place ad salient for all stakeholders.
- Detection – an effective testing and investigations system not only enhances a deterrent effect, but also is effective in protecting clean athletes and the spirit of sport by those committing Anti-Doping Rule Violations, while also helping to disrupt anyone engaged on Doping behaviour.
- Enforcement – to adjudicate and sanction those found to have committed ADRVs.

These four prevention strategies set the framework for the wider anti-doping system.

#### Code Article 20 Additional Roles and Responsibilities of Signatories (ALSO IN WADC)

We support The Advisory Group on Education of the Monitoring Group of the Council of Europe contribution, and co-proposes the proposal to the following Proposed Text

#### 20.1 Roles and Responsibilities of the International Olympic Committee

20.1.9 To require participating countries/NOC to conduct anti-doping education programs in collaboration with the NADO, prior to the Olympic Games, which must as a minimum inform athletes of the anti-doping rules and changes in jurisdiction for the Games at which they intend to participate.

20.1.10 To actively encourage NOCs to ensure that Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Olympic Games they aim to attend.

20.1.11 To require NOC to have an anti-doping point of contact to support effective collaboration between NADO, National Federations and Governments.

[Comment to Article 20.1 – The IOC should ensure that NADOs of participating countries where the NADO is not part of the NOC, receive the anti-doping rules for the Olympic Games in a timely manner.]

#### 20.2 Roles and Responsibilities of the International Paralympic Committee

20.2.9 To require participating countries/NPC to conduct anti-doping education programs in collaboration with the NADO, prior to the Paralympic Games, which must as a minimum inform athletes of the anti-doping rules and changes in jurisdiction for the Games at which they intend to participate.

20.2.10 To actively encourage NPCs to ensure that Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Paralympic Games they aim to attend.

20.2.11 To require NPC to have an anti-doping point of contact to support effective collaboration between NADO, National Federations and Governments.

*[Comment – The IPC should ensure that NADOs of participating countries where the NADO is not part of the NPC, receive the anti-doping rules for the Paralympic Games in a timely manner.]*

#### 20.3 Roles and Responsibilities of the International Federations

20.3.12 To ensure that any anti-doping programs associated with international events they sanction consist of both education and testing. International federations should focus on event-based education, particularly at junior international competitions and consider working in partnership with the host countries NADO or RADO to implement.

20.3.13 To ensure an appropriate information and education program is in place for any athlete joining an international-registered testing pool.

20.3.14 To require National Federations to conduct education programs for athletes and ASP in collaboration with the applicable NADO/RADO, and to ensure they provide access to athletes for the purposes of education as well as testing.

20.3.15 To require National Federations to have an anti-doping point of contact to support effective collaboration between NADO/RADO, National Federations and Governments.'

20.4 Roles and Responsibilities of National Olympic Committees and National Paralympic Committees

20.4.11 To actively support education.

20.4.12 To require National Federations to conduct education programs for athletes and ASP (in priority order as outlined in the ISE) in collaboration with the applicable NADO/RADO, and to ensure they provide access to athletes for the purposes of education as well as testing.

20.5 Roles and Responsibilities of National Anti-Doping Organizations

20.5.8 To coordinate the education system for their country, working in collaboration with National Federations, NOC, NPC, Governments and wider professional associations.

and to cooperate with International Federations, IOC/IPC and MEOs in the implementation of education programmes for International-level athletes during international sport events.

20.5.9 To ensure an appropriate information and education program is in place for any athlete joining a national-registered testing pool.

20.6 Roles and Responsibilities of Major Event Organizations

20.6.7 To ensure that any anti-doping programs associated with international events they sanction consist of both education and testing. Major Event Organisations should focus on event-based education consider working in partnership with the host countries NADO or RADO to implement.

20.7 Roles and Responsibilities of WADA

20.7.6 To promote, commission, fund and coordinate anti-doping research and to activate education through the development and promotion of anti-doping tools, resources and programs.

21.3 Roles and Responsibilities of Regional Anti-Doping Organizations

21.3.6 To coordinate the education system for their region, working in collaboration with National Federations, NOC, NPC, Governments and wider professional associations.

21.3.7 To ensure an appropriate information and education program is in place for any athlete joining a national-registered testing pool.

### **Irish Sports Council**

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

SUBMITTED

Overall Sport Ireland supports the first draft of the International Standard for Education and hopes that it will harmonise and raise the standard of education delivered globally. Sport Ireland recommends that it should be clear which aspects of the Standard are mandatory (i.e shall be completed) and which aspects are aspirational (i.e. may or should be completed) as this is vital for compliance with the standard. As this is the first version of the Standard, Sport Ireland would recommend that in the first instance that there be a minimum level of mandatory articles to ensure that ADOs are in a position to implement the Standard effectively and also be compliant. The second version should further develop this Standard by increasing more mandatory articles.

Sport Ireland looks forward to reviewing the the New Guidelines for Education when developed.

### Institute of National Anti-Doping Organisations

SUBMITTED

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

4th last line of introduction (and elsewhere) the reference to "Testing Program" should be expanded to "Testing and Investigations Program". Failure to do this diminishes the role of investigations and fails to alert readers to its relevance.

## 2.0 Code provisions (6)

### Department of Health - National Integrity of Sport Unit

SUBMITTED

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

The ISE states WADA will act as a central clearinghouse for education resources developed by ADOs. If this is intended to achieve WADA becoming a repository of anti-doping education resources for widespread access, that is supported. There would however be concerns about WADA taking on formal approval responsibilities for national anti-doping education efforts as this would appear to be operating beyond jurisdiction, and would add an unnecessary layer of bureaucracy.

When discussing research, the ISE could be more specific and should reference behavioural and cultural change as well as the efficacy of intervention programs.

### ministère chargé des sports, direction des sports

SUBMITTED

Michel LAFON, Chef de bureau (France)  
Public Authorities - Government

The main point is that the coordination of prevention's policies is given to the NADOs (art. 18.5 and 20.5.9 of the draft code) and that they shall be the authority on Anti-Doping and education within their respective countries ((point 5.2.1 ISE). In some countries such as France, this provisions could be difficult to implement for legal and political reasons. Among this, the legitimacy of the NADO to lead a interministerial policy is not consistent. In France, the sport ministry is more legitimate to coordinate a national policy with the ministry of education, health and youth. This organization ensure the effectiveness of that policy. That's why, in our country we have a steering committee for anti-doping education plan and program, chaired by the ministry attended by the NADO and other actors.

So, our proposals below give more flexibility for the countries :

- 

Art. 18.5 of the code : *The Education Program shall be coordinated by of the NADO shall be coordinated at national level, working in collaboration with their respective national sports federations, NOC, NPC, Governments and wider educational institutions. This coordination should maximise the reach of education programmes across sports, athletes and ASP and minimise duplication of effort.*

- 

Art. 20.5.9 of the code : *To coordinate plan the their education programmes plan for their country, and to cooperate at national level with working in collaboration with National Federations, NOC, NPC, Governments and wider professional associations International Federations, IOC/IPC and MEOs in the*

*implementation of education programmes for International-level athletes during international sport events.*

## **Council of Europe**

SUBMITTED

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

Please see below the Council of Europe proposals to the Code revision with the new Article 18, and additional comments and proposals for other Code Articles that relate to Education. Once these have been reviewed, these would then replace the existing Part 2.0 of the ISE.

### **18 Education**

*Proposed changes to replace current 18.1, 18.2 and 18.4*

#### **“18.1 Principle and Primary Goal**

The main principle for Education Programs is to actively contribute to the anti-doping system as one of the four prevention strategies intended to preserve the spirit of sport and to help foster a clean sport environment as described in the Introduction to the *Code*.

The primary goal of Education is to raise awareness, inform, to instil values, develop life skills and decision-making capability to prevent intentional and unintentional anti-doping rule violation as well as reform and rehabilitate in cases of transgressions.

All Signatories, shall within their scope of responsibility (as defined in *Article 18* and *Article 20* and *Article 21*) and in cooperation with each other, plan, implement, monitor and evaluate Education Programs in line with the principles set out in the International Standard for Education (ISE) to protect clean sport.

The Education Program should encompass a range of interventions as outlined in *Article 18.3.1*.

#### **18.2 Target Groups and Education Pool**

##### **18.2.1 Athletes**

Athletes as defined by each Anti-Doping Organization that are subject to the anti-doping rules shall be considered as part of the education plan in line with the requirements of the International Standard for Education.

Competitive athletes below national-level, in sports clubs or schools, should be targeted where resources are available, specifically in high risk sports.

*[Comment to Article 18.2.1: Where a NADO decides to use its discretion to broaden its anti-doping activities to recreational-level athletes and those participating in fitness type activities, information should be established for these groups of athletes prior to any testing activities being implemented. Athletes at this level must be made aware of the rules they are subject to, their rights and responsibilities and key information to mitigate the risks of inadvertent doping relevant to them.]*

##### **18.2.2 Athlete Support Personnel**

Athlete Support Personnel (ASP) may influence athletes and their behaviour. ASP have a responsibility to inform and counsel Athletes regarding ethical sporting practice, and anti-doping rules and procedures pursuant to the *Code*. ASP who are bound by the *Code* and anti-doping rules and must be made aware of such, including the consequences of doping.

Therefore, ASP shall be considered as part of the Education Program, where coaches and medical personnel, shall be the primary focus. For younger athletes, parents should be included.

*[Comment to Article 18.2.2: ADO's should identify and where resources permit implement interventions for wider ASP such as; nutritional personnel, sport science personnel, team managers, sports officials, teachers, athlete agents and the media. For international competitions, ASP such as Chef de Missions for National Teams, or Heads of Delegation, may benefit from inclusion in the Education Program.]*

### **18.2.3 Education Pool**

Signatories/ADO's shall identify their target groups and form an Education Pool in line with the minimum requirements outlined in the ISE.

*[Comment to Article 18.2.3: The Education Pool should not be limited to National- or International-Level Athletes and should include all Persons, including youth, who participate in sport under the authority of any Signatory, government or other sports organization accepting the Code. (See definition of Athlete.) These programs must also include Athlete Support Personnel and consider wider, Persons, as defined in the Council of Europe Anti-Doping Convention and UNESCO Anti-Doping Convention. These principles are consistent with the UNESCO Convention with respect to education and training.]*

## **18.3 Education Program and Plan**

### **18.3.1 Education Program**

The programs and associated interventions shall promote the spirit of sport and focus on developing a clean sport environment to have a positive and long-term influence on the choices made by Athletes, Athlete Support Personnel and other Persons.

The Education Program shall include the following components; Awareness, Information, Communication, Values-Based Education, and Anti-Doping Education and cover as a minimum the following topics, as they are relevant for specific target groups:

- Principles and values associated with clean sport
- Athletes rights and responsibilities
- Consequences of doping including health, social, psychological effects and the case management process
- Anti-doping rule violations
- The prohibited list, including in- and out-of-competition periods
- Risks with medications and supplements, including health consequences
- TUEs
- Testing procedures, including urine, blood and the biological passports
- Requirements of a registered testing pool, including Whereabouts and use of ADAMS
- International competition (for those attending a major games or international sporting event)
- Speaking up to share concerns about doping
- Importance of anti-doping and its governance, including jurisdiction

Athletes who become part of a registered testing pool should be educated in understanding and fulfilling their Whereabouts requirements. For younger athletes, programs should be values-based, with a focus on instilling the spirit of sport, ideally through the school programmes.

### **18.3.2 Education Plan**

Signatories responsible for education must develop an Education Plan that demonstrates the Education Program interventions and who these are targeting. This plan should be long-term and include how the Education Program will be monitored and evaluated.

Signatories shall undertake a current situation assessment to establish risk areas, target groups and the resources required to deliver the plan.

Any prioritization of target groups or interventions should be justified based on a clear rationale as part of the Education Plan.

*[Comment to 18.3.2 – WADA Guidelines document the TDSSA already provides sport specific knowledge relating to the risk of doping with a sport. Such information can be used to inform the risk assessment process to identify priority target groups for education programs. WADA also provides information and education resources for ADO's to use to support their program delivery.]*

#### **18.4 Education Program Implementation**

Athletes and ASP must not be put at risk of inadvertent doping due to misinformation being presented, or disengaged from the anti-doping system through the provision of poor education.

Any education intervention of ADO shall be delivered by a trained and authorized person according to the responsibilities in the International Standard for Education.

ADOs should ensure that education delivery is appropriately quality assured, and data, as specified in the ISE, should be collected on an annual basis and reported to WADA.

*[Comment 18.4 - The purpose of this provision is to introduce the concept of an Educator. Education should only be delivered by a trained and competent person, similar to testing whereby only trained and appointed DCO's can conduct tests. In both cases, the requirement for trained personnel is to safeguard the athlete and maintain consistent standards of delivery. Further details of the requirements can be found in the ISE, and WADA Model Guidelines for Education, including best practice examples of interventions that can be implemented]*

#### **18.5 Coordination and Cooperation**

The Education Program shall be coordinated by the NADO at national level, working in collaboration with their respective national sports federations, NOC, NPC, Governments and wider educational institutions. This coordination should maximise the reach of education programmes across sports, athletes and ASP and minimise duplication of effort.

International-level athletes should be the priority for International Federations, where event-based education should become a mandatory element of any anti-doping programme associated with an International Event.

NADO and government should cooperate to embed values-based education into the school programmes.

All Signatories shall proactively support participation by Athletes and Athlete Support Personnel in education programs.

WADA will work with international partners to support the implementation of ISE and act as a central repository for information and education resources and/or programs developed by WADA or ADO's. Signatories shall cooperate with each other and Governments to coordinate their efforts

*[Comment to 18.2.1 – Further guidance for signatories with responsibility for education can be found in Article 20.]”*

#### **Current 18.3 Professional Codes of Conduct**

*We propose that this article is repositioned and further clarified as it. Our view is that 18.3 is trying to reflect the following two points:*

- That Codes of Conduct should be in place, working in collaboration with relevant professional associations.

- That sports organisations should ensure that they have relevant disciplinary procedure in place should, as an example, an anti-doping organisation have insufficient evidence to prosecute an anti-doping rule violation, but there is sufficient evidence to bring a disciplinary procedure. Equally, sports organisations must ensure they have sufficient polices in place to remove and sanction those from their sport when required.

*In light of the above, we propose that Article 18.3 in its current form is clarified and moved to Part 3 of the Code's, Roles and Responsibilities section:*

## **20 Additional Roles and Responsibilities of Signatories**

“All Signatories shall cooperate with each other and governments to encourage relevant sports organisations, educational institutions, and professional associations to develop and implement appropriate Codes of Conduct that reflect good practice and ethics related to sport practice regarding anti-doping, as well as sanctions, which are consistent with the Code.

[Comment: Such Codes should make provision for appropriate disciplinary action to be taken by sports bodies to either support the implementation of any doping sanctions, or for an organisation to take its own disciplinary action should insufficient evidence prevent an anti-doping rule violation being brought.]”

## **19 Research**

*Proposed amendment:*

### **New - 19.2 Social Science Research**

“Social science research should focus on sport educational practices, athlete education techniques and motives (psychosocial) reasons for doping behaviour.

Research studies to evaluate the reach and impact of education programmes and interventions should also be prioritised, including development of programs for less resourced ADOs to help them meet the requirements of the ISE.

WADA shall support the coordination of social science research, encouraging the research community to submit proposals in collaboration with ADO's. WADA will commit to sharing such research with the anti-doping community.”

## **20 Additional Roles and Responsibilities of Signatories**

### **20.1 Roles and Responsibilities of the International Olympic Committee**

*Proposed revision of current 20.1.10 and adding 2 new subarticles:*

“20.1.10 To require participating countries/NOC to conduct anti-doping education programs in collaboration with the NADO, prior to the Olympic Games, which must as a minimum inform athletes of the anti-doping rules and changes in jurisdiction for the Games at which they intend to participate.

20.1.10' To actively encourage NOCs to ensure that Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Olympic Games they aim to attend.

20.1.10” To require NOC to have an anti-doping point of contact to support effective collaboration between NADO, National Federations and Governments.

*[Comment to Article 20.1 – The IOC should ensure that NADOs of participating countries where the NADO is not part of the NOC, receive the anti-doping rules for the Olympic Games in a timely manner.]”*

### **20.2 Roles and Responsibilities of the International Paralympic Committee**

*Proposed revision of current 20.1.9 and adding 2 new subarticles:*

“20.2.9 To require participating countries/NPC to conduct anti-doping education programs in collaboration with the NADO, prior to the Paralympic Games, which must as a minimum inform athletes of the anti-doping rules and changes in jurisdiction for the Games at which they intend to participate.

20.2.9' To actively encourage NPCs to ensure that Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Paralympic Games they aim to attend.

20.2.9” To require NPC to have an anti-doping point of contact to support effective collaboration between NADO, National Federations and Governments.

*[Comment – The IPC should ensure that NADOs of participating countries where the NADO is not part of the NPC, receive the anti-doping rules for the Paralympic Games in a timely manner.]”*

### **20.3 Roles and Responsibilities of the International Federations**

*Proposed revision of current 20.3.13 and adding 3 new subarticles:*

20.3.13 To ensure that any anti-doping programs associated with international events they sanction consist of both education and testing. International federations should focus on event-based education, particularly at junior international competitions and consider working in partnership with the host countries NADO or RADO to implement.

20.3.13' To ensure an appropriate information and education program is in place for any athlete joining an international-registered testing pool.

20.3.13” To require National Federations to conduct education programs for athletes and ASP (in priority order as outlined in the ISE) in collaboration with the applicable NADO/RADO, and to ensure they provide access to athletes for the purposes of education as well as testing.

20.3.13”” To require National Federations to have an anti-doping point of contact to support effective collaboration between NADO/RADO, National Federations and Governments.

### **20.4 Roles and Responsibilities of National Olympic Committees and National Paralympic Committees**

*Proposed revision of current 20.4.12 and adding a new subarticle:*

“20.4.12 To actively support education.

20.4.12 To require National Federations to conduct education programs for athletes and ASP (in priority order as outlined in the ISE) in collaboration with the applicable NADO/RADO, and to ensure they provide access to athletes for the purposes of education as well as testing.”

### **20.5 Roles and Responsibilities of National Anti-Doping Organizations**

*Proposed revision of current 20.5.9 and adding a new subarticle:*

20.5.9 To coordinate the education plan for their country, working in collaboration with National Federations, NOC, NPC, Governments and wider professional associations and to cooperate with International Federations, IOC/IPC and MEOs in the implementation of education programmes for International-level athletes during international sport events.

20.5.9' To ensure an appropriate information and education program is in place for any athlete joining a national-registered testing pool.

### **20.6 Roles and Responsibilities of Major Event Organizations**

*Proposed revision of current 20.6.8:*

20.6.8 To ensure that any anti-doping programs associated with international events they authorize consists of both education and testing. Major Event Organisations should focus on event-based education consider working in partnership with the host countries NADO or RADO to implement.

## 20.7 Roles and Responsibilities of WADA

*Proposed revision of current 20.7.6:*

20.7.6 To promote, commission, fund and coordinate anti-doping research and to activate education through the development and promotion of anti-doping tools, resources and programs, for ADOs, especially NADOs as national coordinators of the anti-doping education plan

## 21 Additional Roles and Responsibilities of Athletes and Other Persons

### 21.3 Roles and Responsibilities of Regional Anti-Doping Organizations

*Proposed revision of current 21.3.6 and adding a new subarticle:*

21.3.6 To coordinate the education plan for their country or for RADO's their Region, working in collaboration with National Federations, NOC, NPC, Governments and wider professional associations.

21.3.6' To ensure an appropriate information and education program is in place for any athlete joining a national-registered testing pool.

### Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

\*Specific Code-related comments are submitted separately via 2021Code consultation. Below are some considered points separately in relation to the ISE.

- Although the significance of Media can be understood especially like the investigative media, it would be preferable to have some guidelines for education on media. Media tends to focus on "scandals" rather than the continued effort on sport values.
- Only Code19.1 is mentioned here but 19.2 and 19.3 should also be mentioned here.
- Promotion of social science research and the outputs of the research applying to the practical in particular can be mentioned in the ISE (if not, in Guideline).
- Educating on Individual is stressed through the Code. However, the team sport as a whole and the team's responsibility should be given more weight in the Code in light of the ISE is implemented.

### NADA Austria

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

Please see our proposals on the WADC and draft text for a new Article 18, and additional comments and proposals for other Code Articles that relate to Education. Once these have been reviewed, these would then replace the existing Part 2.0 of the ISE.

### Anti Doping Denmark

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

SUBMITTED

Proposed Code Revision, including proposed text for at new Article 18

We support The Advisory Group on Education of the Monitoring Group of the Council of Europe contribution, and co-proposes the proposal of changes to the current Code to the following adjustments and Proposed Text to Article 18. There might occur minor adjustments by ADD to the proposed text.

## Code Article 18 Education

COMMENT: In recognition and support of a new International Standard for Education we co-propose that changes to the current Code Articles should be considered.

The proposed text is provided as an example of how *Code* Article 18 could be adapted to set the required educational framework of anti-doping programs for the future, and to meet the needs to the new International Standard for Education. Please note that the proposed text includes an expanded number of articles and reordered articles.

### 18.1 Principle and Primary Goal

The main principle for Education Programs is to actively contribute to the anti-doping system as one of the four prevention strategies intended to preserve the spirit of sport and to help foster a clean sport environment as described in the Introduction to the *Code*.

The primary goal of Education is to raise awareness, inform, to instill values, develop life skills and decision-making capability to prevent intentional and unintentional anti-doping rule violation as well as reform and rehabilitate in cases of transgressions.

All Signatories, shall within their scope of responsibility (as defined in *Article 18* and *Article 20* and *Article 21*) and in cooperation with each other, plan, implement, monitor and evaluate Education Programs in line with the principles set out in the International Standard for Education (ISE) to protect clean sport.

The Education Program should encompass a range of interventions as outlined in *Article 18.3.1*.

All Signatories shall cooperate with each other and governments to encourage relevant sports organisations, educational institutions, and professional associations to develop and implement appropriate Codes of Conduct that reflect good practice and ethics related to sport practice regarding anti-doping, as well as sanctions, which are consistent with the *Code*.

### 18.2 Target Groups and Education Pool

#### 18.2.1 Athletes

Athletes as defined by each Anti-Doping Organization that are subject to the anti-doping rules shall be considered as part of the education plan in line with the requirements of the International Standard for Education.

Competitive athletes below national-level, in sports clubs or similar, should be targeted where resources are available, specifically in high risk sports.

*[Comment to Article 18.2.1: Where a NADO decides to use its discretion to broaden its anti-doping activities to recreational-level athletes and those participating in fitness type activities, information should be established for these groups of athletes prior to any testing activities being implemented. Athletes at this level must be made aware of the rules they are subject to, their rights and responsibilities and key information to mitigate the risks of inadvertent doping relevant to them.]*

#### 18.2.2 Athlete Support Personnel

Athlete Support Personnel (ASP) may influence athletes and their behaviour. ASP have a responsibility to inform and counsel Athletes regarding ethical sporting practice, and anti-doping rules and procedures pursuant to the *Code*.

ASP who are bound by the *Code* and anti-doping rules and must be made aware of such, including the consequences of doping.

Therefore, ASP shall be included as part of the Education Program in line with the requirements outlined in the ISE.

### 18.2.3 Education Pool

Signatories/ADO's shall identify their target groups and form an Education Pool in line with the minimum requirements outlined in the ISE.

## 18.3 Education Program and Plan

### 18.3.1 Education Program

The programs and associated interventions shall promote the spirit of sport and focus on developing a clean sport environment to have a positive and long-term influence on the choices made by Athletes, Athlete Support Personnel and other Persons.

The Education Program shall include the following components; Awareness, Information, Communication, Values-Based Education, and Anti-Doping Education should cover as a minimum the following topics;

Principles and values associated with clean sport

Athletes rights and responsibilities

Consequences of doping including health, social, psychological effects and the case management process

Anti-doping rule violations

The prohibited list, including in- and out-of-competition periods

Risks with medications and supplements, including health consequences

TUEs

Testing procedures

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

International competition (for those attending a major games or international sporting event)

Speaking up to share concerns about doping

Importance of anti-doping and its governance, including jurisdiction

Athletes who become part of a registered testing pool should be educated in understanding and fulfilling their Whereabouts requirements. For younger athletes, programs should be values-based, with a focus on instilling the spirit of sport.

### 18.3.2 Education Plan

Signatories responsible for education must develop an Education Plan that demonstrates the Education Program interventions and who these are targeting. This plan should be long-term and include how the Education Program will be monitored and evaluated.

Signatories shall undertake a current situation assessment to establish risk areas, target groups and the resources required to deliver the plan.

Any prioritization of target groups or interventions should be justified based on a clear rationale as part of the Education Plan.

*[Comment to 18.3.2 – WADA Guidelines document the TDSSA already provides sport specific knowledge relating to the risk of doping with a sport. Such information can be used to inform the risk assessment*

*process to identify priority target groups for education programs. WADA also provides information and education resources for ADO's to use to support their program delivery.]*

#### 18.4 Program Implementation

Athletes and ASP must not be put at risk of inadvertent doping due to misinformation being presented, or disengaged from the anti-doping system through the provision of poor education.

Any education intervention of ADO shall be delivered by a trained and authorized person according to the responsibilities in the International Standard for Education.

ADOs should ensure that education delivery is appropriately quality assured, and data, as specified in the ISE, should be collected on an annual basis and reported to WADA.

#### 18.5 Coordination and Cooperation

The Education Program shall be coordinated by the NADO at national level, working in collaboration with their respective national sports federations, NOC, NPC, Governments and wider educational institutions as described in the ISE. This coordination should maximize the reach of education programmes across sports, athletes and ASP and minimize duplication of effort.

All Signatories shall proactively support participation by Athletes and Athlete Support Personnel in education programs.

WADA will work with international partners to support the implementation of ISE and act as a central repository for information and education resources and/or programs developed by WADA or ADO's. Signatories shall cooperate with each other and Governments to coordinate their efforts

[Comment to 18.2.1 – Further guidance for signatories with responsibility for education can be found in Article 20.]

#### 19.2 Social Science Research

Proposed text:

Social science research should focus on sport educational practices, athlete education techniques and motives (psychosocial) reasons for doping behaviour.

Research studies to evaluate the reach and impact of education programmes and interventions should also be prioritised, including development of programs for less resourced ADOs to help them meet the requirements of the ISE.

WADA shall support the coordination of social science research, encouraging the research community to submit proposals in collaboration with ADO's. WADA will commit to sharing such research with the anti-doping community.

### 3.0 Definitions and interpretation (4)

#### Council of Europe

SUBMITTED

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

*The definition and associated text that refers to 'Athlete' should match the same text included in the Code Article 18. The definition for Athlete Support Personnel be amended.*

**Athlete Support Personnel:** Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person treating or assisting an athlete to improve sports performance or preparing for competition.

**Japan Anti-Doping Agency**

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

- In Guideline, the detailed examples of priority x target x methodology depending on the Education categories.  
- Definition on "Anti-Doping Organization" - this should be included on "Education". "...Doping Control Process and Education".

**NADA**

Regine Reiser, Result Management (Deutschland)  
NADO - NADO

SUBMITTED

**Comment (page 9)**

The definition and associated text that refers to 'Athlete' should match the same text

**Comment (page 10)****We propose the following Draft Text**

**Athlete Support Personnel:** Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person treating or assisting an athlete included in Article 18.

**NADA Austria**

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

Please see our proposals on the WADC and draft text for a new Article 18, and additional comments and proposals for other Code Articles that relate to Education. Once these have been reviewed, these would then replace the existing Part 2.0 of the ISE.

**3.1 Defined terms from the 2015 Code that are used in the International Standard for Education: (1)****Japan Anti-Doping Agency**

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

"International-Level Athlete" "National-level Athletes" "Testing Pool" (defined in P16)  
- Setting definition in ISE with "Testing Pool" or "Testing Pool Athletes and Athletes competing at International Events as well as their Support Personnel" in relation to "International-Level Athlete" and "National-Level Athlete" create confusions.  
--> These definitions are left open to IF and NADO. There are discrepancies in definition among NADOs and IFs regarding "International/National-Level Athlete" and "Testing Pool" Athlete. It would be better to provide the basic understanding of these target groups, which does not prioritise for testing purpose for Whereabouts or OOC. Evaluation criteria in Education should be clarified.

**3.2 Defined terms specific to the International Standard for Education: (10)****World Rugby**

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

SUBMITTED

**3.2.2 ref: (4) Values Based Education**

Is the intention that values are something specific and tangible to be taught (and measured), or that they are more a more common theme underlying all education? If it's the former, then some examples/clarity on how this may actually look (possibly in a comment), and be measured, could be beneficial. If the latter (which the comment to 4.3.2 would suggest), this could perhaps be made clearer.

### Council of Europe

SUBMITTED

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

#### 3.2.1 Prevention

*This text should match the text proposed for the Code as it relates to the term Prevention and how that is defined.*

#### 3.2.2 Education

*The list of education activities should be reordered to better reflect the degree to which they impact on learning. Proposed revision of current text:*

- 1) Awareness** – highlighting topics/issues within the framework of anti-doping such as values, why it is important to prevent doping, key terms and messages. Normally conducted as media or social media campaigns to promote, support and reinforce a clean sport environment as the only accepted standard.
- 2) Information** – providing accurate, and up to date anti-doping material directly related to Article 18 of the Code, and how to access further reliable information from websites, Apps or any other information tool or platform.
- 3) Communication** – establishing channels that allow the learner to exchange information, and engage with the education plan or be officially updated on changes within the wider anti-doping system.
- 4) Values-Based Education – (no changes to text)**
- 5) Anti-Doping Education – (no changes to text)**

### Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

The defined terms regarding "Education" which is defined under "Prevention" (3.2.1), "Education" (3.2.2), "Education Plan", "Education Program" (Definition) have some discrepancies in descriptions. It would be better to have a little more consistencies. Also, the detailed approach x methods would be necessary when it comes to implementation, which can be left to Guideline.

3.2.1 - "The ultimate goal of the anti-doping system is to preserve the sprit of sport and to prevent the behaviour of doping" - this phrase is narrow focused.

Change to "...to develop the future role model in sport and society"

- Definition and aim/objectives on "Education"

Too narrow definition. This should include 'to foster/develop a real champion/ role model in sport and society'.

- "reform and rehabilitate in cases of transgression" is difficult to understand. Rather, it would be better to include what the "values-based education" is aiming for. - anti-doping system => anti-doping program

3.2.2 - Use of "Communication" provides a misunderstanding (particularly for non-English speakers: normally 'communication' means media communication and communication message via some media to wider audience).

Use something like "Learner Channel" or "Information Exchange"" 5 Key Components" - confusing and some inconsistencies described in explanations. Each component should include values part.

- Detailed Education components can be illustrated in Guideline on Target groups, appropriate contents, methodology (pedagogical approach) and examples of programme areas.

<Suggested changes>- Each "Key Components" should define the objectives with particular target (where possible), followed by the program activities.

For example, "Awareness - to provide the basic understanding why sport values matters and why anti-doping matters, particularly targeted to youth athletes and those athletes coming into the performance pipeline as well as to public. This includes the outreach activity, public campaign and PR."

- "Information" x "Anti-Doping Education" can be described as "Anti-Doping Rules-based Education" or "Anti-Doping Information Program". The objective is to ensure the accurate, updated anti-doping rules in order to ensure avoiding the inadvertent doping and to ensure risk management and targeted to Athletes and their Support Personnel. This can be followed by 'methodology' on how to achieve this objective, and the necessary / expected materials.

- "Values-Based Education" - "integrity" of self and sport can be included.

- "Doping" - (practically) it's good to have the commonly understood definition as people (mistakenly sometimes) tend to refer anti-doping as doping. Also, people tend to 'assume' Doping only refers to Code Art 2.1, 2.2 violations.

More values components should be included in definition like - "Doping" is fundamentally contrary to the spirit of sport and breaks the integrity of sport and sport competitions as well as oneself.

### Anti-Doping Norway

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)

NADO - NADO

Definitions in the ISE should be short and descriptive. Activities and elements should be defined in an article of the standard and not in the definition.

Any definitions that are commonly found in a dictionary should address similar wording in the context of clean sport (e.g education and prevention).

Anti-Doping Norway have suggested that the following definitions should be addressed in the Code and not in the ISE. Prevention: The action of avoiding anti-doping rule violations from arising and promoting clean sport values. Clean Sport Education: Activities to increase knowledge and awareness of anti-doping

The word "deliver" is being used frequently in the ISE such as "deliver education to .....". An ADO may find it difficult to deliver an education program that an audience does not want. The wording could be replaced with a requirement of making Clean Sport Education available to an audience, or a requirement of offering Clean Sport Education to an audience.

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)

NADO - NADO

### 3.2.2 Education

#### We propose the following Draft Text

**1) Awareness** – highlighting topics/issues within the framework of anti-doping such as values, why it is important to prevent doping, key terms and messages.

**2) Information** – providing accurate, and up to date anti-doping material directly related to Article 18 of the Code.

**3) Communication** – establishing channels that allow the learner to exchange information, and engage with the education program, or be officially updated on changes within the wider anti-doping system.

**4) Values-Based Education – (no changes to text)****Anti-Doping Education – (no changes to text)****NADA Austria**

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

Since, according to our suggestion, the definition of Prevention is already in the Code, this definition is not necessary at this place since it would be part of 3.1. (Defined terms from the 2021 Code that are used in the International Standard for Education)

**3.2.2 Education**

**If Prevention is already a defined term in the WADC, this section would be 3.2.1.**

**We propose the following Draft text:**

**“Education will refer to all activities within an Information and Education Program. It is a broad term which encompasses key components of delivering an effective Information and Education Program, specifically:**

- Awareness – highlighting topics/issues within the framework of anti-doping such as values, why it is important to prevent doping, key terms and messages.
- Information – providing accurate, and up to date anti-doping material directly related to Article 18 of the Code, and how to access further reliable information.
- Communication – establishing channels that allow the learner to exchange information, and engage with Anti-Doping Activities, or be officially updated on changes within the wider anti-doping system.
- Values-Based Education – delivering Education activities that places the development of an individual’s personal values and principles at the heart of their evolving sport experience. It prioritizes the development of the learner’s Ethical Literacy by building their capacity to make decisions based on moral reasoning.
- Anti-Doping Education – delivering high quality anti-doping training to Athletes, Athlete Support Personnel and other defined Persons to ensure competence in all aspects related to anti-doping requirements.”

The following sentence starting with “The Anti-Doping Organization shall ensure that their...” is good, but not at the right position here, since it is the definitions part. We recommend to move it to Part Two.

**UK Anti-Doping**

SUBMITTED

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

**3.2.1** - Concern has been raised that the term 'life skills' may be too broad. Could this be limited to refer to sport, anti-doping or both?  
**3.2.2** - Under the definition of Education, there is a range of additional definitions. We query whether methods of how each thing is to be achieved should be removed from the sub-definitions, so that they are limited to what the terms are rather than how they are to be achieved.  
5) previous version of the ISE used the term 'Clean Sport Educators', and in our view this should be reinstated in place of 'Education Officer', to avoid confusion with any other 'Education Officer' operating within a sporting context.

**Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

3.2.2 5). Communication could be removed and certain elements of its definition could be moved to other bullet points within the article for example social media and websites could be included in information bullet point and e-learning and Education Officers could be included in the Anti-Doping Education bullet point.

**AFLD (Agence française de lutte contre le dopage)**

SUBMITTED

Catherine Coley, Director, Communications and prevention (France)  
NADO - NADO

3.2.2. 3) We suggest replacing *Anti-doping Education* with ***Anti-Doping Learning***

**Kamber-Consulting**

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)  
Other - Other (ex. Media, University, etc.)

**3.2.1 Prevention**

There is a 5th element in prevention: that is a clear strategy and procedure to inform and communicate about the 4 elements education, deterrence, detection and enforcement. Without this element in place, the other four parts of a prevention strategy will fall short and will not have the desired effect.

**3.3 Other Defined Terms: (10)****Department of Health - National Integrity of Sport Unit**

SUBMITTED

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

The definition of 'Testing Pool' does not appear fit for purpose in the ISE. It appears the concept of a testing pool, as defined in the ISE, is used to capture relevant athletes who are required to undertake education. The definition is confusing and could be better phrased.

**ministère chargé des sports, direction des sports**

SUBMITTED

Michel LAFON, Chef de bureau (France)  
Public Authorities - Government

Accreditation and certification of education officers systems such as described in the standard are too demanding in terms of organization and means. We think they are also too complex to be implemented.

So our proposal is to modify article 3.3 of ISE : *An ~~accredited~~ appointed official who has been trained and authorized by the Anti-Doping Organization to carry out the responsibilities given to Education Officers in the International Standard for Education.*

### Council of Europe

SUBMITTED

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

*The definition for **Mutual Recognition** should be considered to be removed to be consistent with other parts of the anti-doping system where mutual recognition exists such as TUEs. We propose the concept of Mutual Recognition be moved to the actual ISE text, Article 5.3.*

*The definition for **Testing pool** should be altered and reframed to Education Pool; the term Testing Pool should be replaced with the term Education Pool throughout the Standard.*

**Education Pool:** The identified pool of athletes and athlete support personnel as defined by an ADO for the purposes of the Education Program that as a minimum shall include national-level and international-level athletes, athletes part of a Registered Testing Pool, and those subjected to the Testing programme. Prioritization of such athletes and athlete support personnel within the Education Pool to be targeted should be justified as part of the Education plan.

[Comment – WADA has a range of education tools for ADOs to use to meet the requirements of the ISE for all priority target groups.]

*The definition for **Risk Assessment** revision:*

**Risk Assessment:** '.....This will provide directions for content emphasis as well as indications of those most at risk of and vulnerable to doping who will be considered as most in need of Education. An assessment of the wider.....'

### Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

"Education Officer"

- If this is assumed that all ADO must train and accredit (and reaccredit) the Education Officer, it would be preferable to mention the 'mutual recognition' of Education Officer whom trained by NADO or IF. This will encourage more cooperation between NADO and IF.

- What are the competencies, quality and experiences that ADO should look for? It would be better to mention these (competencies, qualities) as the minimum requirement for becoming an Education Officer ensuring the minimum standard - for example, what kind of training contents, what kind of 'education background' is desirable (not the must)

- Reaccreditation procedure - as for the DCO case, how long the accreditation can last (better to reaccredit every year)?

- Based on the practicalities, some NADOs use DCOs as the "Educator" playing the double roles (other NADOs do not ask DCOs to play any education role). It would be better to mention in the ISE (or also in ISTI) what kind of roles the DCOs could be expected to play even though they need to be competent.

"Medical Adviser" - must also be defined. They are not "Educator" but have specialist knowledge in medial or pharmaceutical field.

"Legal Adviser" - could also be defined.

**"Mutual Recognition"**

- how to mutually recognise between NADO and IF could be mentioned (as per ISTI).  
 - to avoid the 'education overload', the relationship between the NADO, NOC and NPC (and NF) can be illustrated.

"Prevention" - better to give a wider scope on values, rather than just "stopping the behaviour of doping".

If continued and used, the followings should also be defined:

"Clean Sport Environment"

"Clean Sport"

"Young people"

"Youth athletes" - Separations between young people/athletes can be mentioned given the fact that the values-based education is focused on Young people in general.

<Suggested changes>"Ethical Literacy" "Life Skills" - both terminologies are similar, which include making "reasoned decision" and "decision-making". These are very wide scope, hence the wording could be changed to (for example):

"Ethical Literacy" is aimed to develop the leaders or role model in society through sport. Those leaders have learned to acquire the "Life-Skills" which can be learned through xxxx (education intervention) - Very difficult to 'evaluate' what kind of "Life Skills" or "Ethical Literacy" has been acquired.

"Event-Based Education" - more clarities necessary. For example:

Not only awareness or promotional, marketing and branding campaigns like Outreach booth but also seminar before the competitions like technical/ team briefing should be included. This takes place at or leading up to a sporting event or at the actual event. Organising and delivery of the program is the responsibility of IF.

- the last sentence "The competition organizers like..." - "should" be replaced with "shall"

**NADA Austria**

SUBMITTED

Alexander Sammer, Head of Legal (Austria)

NADO - NADO

If Prevention is already a defined term in the WADC, this section would be 3.2.2.

We propose the term "Clean Sport Educator" instead of "Education Officer".

We propose to delete the last sentence of Event-Based Education ("The competition organizers like National and International Federations should initiate this and coordinate with relevant Anti-Doping Organizations.") since this is the definitions part. We recommend to move it to Part Two.

The definition for Mutual Recognition should be considered to be removed to be consistent with other parts of the anti-doping system where mutual recognition exists such as TUEs. We propose the concept of Mutual Recognition be moved to the actual ISE text, Article 5.3.

If Prevention is already a defined term in the WADC, there is no need to define prevention again.

We propose to delete the concept of a mandatory "testing or education pool" that has to be educated at all costs. Each Signatory has to develop and implement an Education plan, prioritize target groups for Education and will be held accountable through the ISCCS to deliver education. It is up to the assessment of Code Compliance to evaluate if the Standard is met. WADA should support all Signatories with a corresponding Guideline.

**UK Anti-Doping**

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

• Education Officer – as above, we think this should be renamed Clean Sport Education Officer, and we would propose that '...has been trained, assessed and authorised...' be added to the definition.  
 • Testing Pool – feedback continues on the term 'Testing Pool' and its use as it relates to the ISE minimum standards.

**AFLD (Agence française de lutte contre le dopage)**

SUBMITTED

Catherine Coley, Director, Communications and prevention (France)  
NADO - NADO

Education Officer: Move this definition to the Guidelines for Education.

Mutual recognition: Remove definition from art. 3.3 but keep concept of Mutual recognition in art. 5.3 of the ISE.

**Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

Life-Skills: Sport Ireland recommends the removal of this definition and that it be encompassed in the definition for Ethical Literacy. It is a large task for NADO's to be in some way responsible for "Life Skills". NADOs can certainly provide programmes for Ethical decision making and values.  
Prevention: The underlined could be inserted to the definition: Refers to the objective of stopping behaviour of doping from occurring before it occurs.

**Kamber-Consulting**

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)  
Other - Other (ex. Media, University, etc.)

**3.3 Other defined terms**

Event-based education: this definition is too specific. It should be formulated more openly. In a definition, there is no room for citing examples, this should be done (if at all) in a footnote. Then it should also include the work with role models on site.

**Institute of National Anti-Doping Organisations**

SUBMITTED

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

The term "Education Officer" introduces the wrong tone. Clean Sport Educator is a better term.

**PART TWO: STANDARDS FOR EDUCATION (5)****China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

The countries with a solid foundation for anti-doping education may not benefit much from the International Standard for Education. Consideration should be given as to how to increase the input and attention of anti-doping organizations in education, for example, new articles can be added to require anti-doping organizations to allocate a proportion of fund to anti-doping education in the light of their investment in testing, or a minimum proportion of the budget should be allocated to education by anti-doping organizations.

**Commonwealth Games Federation Medical Commission**

SUBMITTED

Michele Verroken, Anti-Doping Administrator (UK)  
Sport - Other

**4.2.4 Current Situation Assessment**

education should include an assessment of current knowledge (reviewing whether this is accurate knowledge that may need refining or challenging). It is not a risk assessment. This would relate to need for education.

**4.2.5 Prioritisation of Target Groups**

the list should refer to Medical and Scientific Personnel to reflect the wider group of support personnel now involved.

#### 4.3 Implementing Effective Education

Listing a series of topics required for Athletes and/or Support Personnel to be informed of is not a sound way to educate. It suggests that all topics must be covered whereas to educate there is an important role for the educator to help the learning experience relevant to the age and stage of the recipient.

4.3.5 core life skills are listed, these need defining, especially if this is to be evaluated/measurable.

4.4.3 Athletes should be at the centre of any evaluation. An ADO evaluation is limited in its objectivity. Should ADRVs be a measure of success of education?

Overall the Standard seems to be written for NADOs, if the assumption is that NADOs are responsible for the basic education of athletes, then defining the IF and MEO as event based makes more sense – except that requires each NADO to have similar resources to input to each athlete. ADOs contribute to the whole education of athletes at different ages and situations. Could the Standard help with this coordination?

#### Organizacion Nacional Antidopaje de Uruguay

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

SUBMITTED

An article should be established in which WADA will allow in its hemispheric education seminars to establish and monitor the basic educational aspects of each country as they are interrelated in each region. The RADOs and the associated NADOs must be integrated and these must be reflected as an obligatory action for the State to be able to make a network to share information on the results of the post-educational events. Information that will eventually serve for intelligence and anti-doping testing

#### NADA Austria

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

The ISE constantly refers to Anti-Doping Organizations. According to the WADC an Anti-Doping Organization is “A Signatory that is responsible for adopting rules for initiating, implementing or enforcing any part of the Doping Control process. This includes, for example, the International Olympic Committee, the International Paralympic Committee, other Major Event Organizations that conduct Testing at their Events, WADA, International Federations, and National Anti-Doping Organizations.”

Since this provision heavily relies on the Doping Control Process, we recommend to use the term Signatories throughout the ISE to include all Signatories to the WADC.

#### Drug Free Sport NZ

Sian Clancy, Education Manager (New Zealand)  
NADO - NADO

SUBMITTED

Part two sets out articles from the Code that relate to education.

Of note:

· Code article 18.1 says “...All **Signatories** shall within their means and scope of responsibility, and in cooperation with each other, plan, implement, evaluate and monitor information, Education, and Prevention programs for doping-free sport...” (emphasis added)

· Code article 18.2 says "...All **Signatories** shall promote and support active participation by *Athletes* and *Athlete Support Personnel* in Education Programs for doping-free sport..." (emphasis added)

· Code Article 20 is entitled "Additional Roles and Responsibilities of **Signatories**" (emphasis added) and sets out that the roles and responsibilities of all signatories includes promoting anti-doping education. Of note, no signatory has the responsibility to give or provide anti-doping education.

Article 4.1 states "Article 18.1 of the *Code* requires **Anti-Doping Organizations** to plan, implement and evaluate Education Programs within their means and scope of responsibility, and in cooperation with each other. The objective of Article 4 of the International Standard for Education is to establish standards for the delivery of these responsibilities by *Anti-Doping Organizations*." (emphasis added)

This is not accurate, as Article 18.1 of the Code requires this of signatories, not ADOs. Anti-Doping Organisations is then used repeatedly throughout this section, potentially in error.

Article 4 sets out the obligations of Anti-Doping Organisations (or signatories per the above). These appear to be obligations of National Anti-Doping Organisations. We do not believe IFs, MEOs and WADA, for instance, will be completing all parts of Article 4 (where "must" is used repeatedly).

### **4.3 Implementing effective Education**

#### **4.3.2 - Bullet 4**

In the current Code review, athlete 'health' has been given increased priority but in the ISE, 'health' is only articulated as an example of a consequence of doping: '*consequences of doping, sport (sanctions), health and social* (p. 21). There seems to be an inconsistent emphasis on athlete health between the Code and the ISE.

We suggest that consideration is given to keeping the existing point on health as a consequence of doping (from a technical perspective) and creating an additional bullet which addresses the social and health impacts of doping from a less technical, more holistic perspective.

#### **4.3.8**

Learning principles for adult athletes have been included as Annex B in the ISE. As priority audiences in the ISE also include non-adult athletes, we would like learning principles for adolescent athletes to also be made available as an additional Annex.

## **4.0 Planning, implementing and evaluating effective Education Programs (3)**

### **Department of Health - National Integrity of Sport Unit**

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

SUBMITTED

As currently worded, the ISE requires ADOs to record the overall numbers of parents, medical personnel, media, teachers and university support staff within their jurisdiction to establish the scale in which the ADO's Education Program will be delivered in order to set realistic goals and to prioritize them based on risk. This would prove difficult for an ADO. It would be more feasible for the ADO to record the numbers of athletes on the registered and domestic testing pool and estimate the numbers in the additional groups.

### **Japan Anti-Doping Agency**

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

- Although the ISE set ADO's responsibility in Education, considering the Athletes' roles and responsibilities described in the Code (21.1), the minimum requirement for the Athletes - like RTP Athletes are required 3 times OOC - could be mentioned (e.g. what kind of minimum information Athlete must understand or number of activities an athlete has undertaken).

**Anti-Doping Norway**

SUBMITTED

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

**Cooperation**

Cooperation between the Signatories relating to planning and delivering education should be encouraged stronger.

**Activities**

The bullet points in the Code 18.2 could be moved to the ISE as the ISE draft has copied these bullet points. The principles and values for a Clean Sport should nevertheless be added to the bullet points and addressed in the Clean Sport Education Plan, irrespectively of the bullet points being moved or not.

There should be a requirement for all ADOs that athletes and their support personnel have access to updated information concerning anti-doping rules and requirements at all times.

WADA has published an ADO reference guide to the 2015 WADC (July 2015). Section 2 in this excellent document is providing valuable understandings of definitions and what to include in a Clean Sport Education Plan and program. Anti-Doping Norway suggest that these principles and approaches are defined in the article 18 and the ISE as appropriate.

**4.1 Overview (3)****Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

"...Education Programs should be...also in tandem with other anti-doping activity...such as Testing.." --> This can be illustrated further, possibly in Guideline.  
- "components of Education are delivered in a systematic and planned way" --> These specific examples should be in Guideline.

- "minimum standard" is used elsewhere in ISE - it would be preferable to identify specifically on what this means (considering the fact that this will become Compliance matter).

**NADA Austria**

SUBMITTED

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

We propose the following Draft text:

"4.1.1 Article 18 of the Code requires Anti-Doping Organizations to plan, implement and evaluate Information and Education Programs according to the Education plan, and in cooperation with each other. The objective of Article 4 of the International Standard for Education is to establish standards for the delivery of these responsibilities by Signatories."

**UK Anti-Doping**

SUBMITTED

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

**4.1.1** Consistency of terminology – we would prefer the phrase 'Plan, implement, monitor and evaluate' be used throughout.

## 4.2 Planning effective Education (11)

### International Floorball Federation

Merita Bruun, Anti-doping Manager (Finland)  
Sport - IF – IOC-Recognized

SUBMITTED

When assessing the education needs one of the most important target groups should be:- Athletes and athlete entourage who do not receive education anti-doping education elsewhere

### World Rugby

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

SUBMITTED

#### 4.2.4 – Current Situation Assessment (1. Risk Assessment)

It may need consideration/recognition that due to the number of potential athletes to be covered, team sports may struggle to do such a detailed risk assessment at the individual level. This would not prevent a risk-assessment being done, it may just be done differently to a sport with a smaller elite athlete pool.

### Council of Europe

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

SUBMITTED

#### 4.2.4 Current Situation Assessment

*Proposed revision of current text:*

**2. Target Groups:** The Anti-Doping Organization must seek to quantify target groups within their jurisdiction and to identify the stakeholders who could assist with access or engagement to such target groups. This will include recording the overall number of *Athletes*, *Athlete Support Personnel* and other relevant *Persons*, including those stipulated in Article 18 of the *Code* and outlined in 4.2.5. This will help to establish the scale in which the Anti-Doping Organization's Education Program will be delivered in order to set realistic goals and to prioritize them based on risk in accordance with the Anti-Doping Organizations (sporting) environment.

#### 4.2.5 Prioritization of Target Groups

*Add this text in the first paragraph:*

'..... In terms of prioritizing target groups who will be the focus of the Education Program, the Anti-Doping Organization should consider the assessment process conducted in Article 4.2.4 and have a clear rationale as to why such target groups have been prioritized.'

*Revise the second and third paragraph:*

'...As per Article 18.2 of the *Code*, it is the Athlete Support Personnel's' duty and responsibility to support the fostering of a clean sport environment, and inform and counsel Athletes on ethical sporting practice, and anti-doping rules and procedures pursuant to the *Code*. Anti-Doping Organizations shall within their means, ensure that Athlete Support Personnel are well informed to the standards required to counsel their Athletes accordingly. This is an effective investment of resources as they will continue to counsel all Athletes who come under their authority. Athlete Support Personnel of Education Pool athletes and Athletes who compete at International Events shall be educated, in priority order, as per Article 4.3.4 and in line with the risk assessment and resources available. In the first instances this refers to the coach and medical personnel. For younger athletes, parents and teachers should be the next priority.

In addition to the target groups stated in the definitions of Athlete and Athlete Support Personnel in Article 3.1, specific target groups shall be considered as part of the Education Program as outlined in Article 18 of the Code include:

- Youth Athletes
- Sports Science personnel
- Sports Officials
- Team Managers
- Agents

#### 4.2.8 Monitoring

*Proposed revision:*

'.....This monitoring should include documented qualitative feedback and quantification of the Anti-Doping Organization's Education activities, such as reach and impact metrics. Further guidance on conducting monitoring is provided in the Guidelines for Education. The monitoring.....'

#### Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

#### "Planning effective Education"

Though it is true that ADO can decide on how to prioritise the target group, there are practical and realistic demands and risk, meaning, those who are potentially undergo the Doping Control would potentially face ADRV, hence higher priority. Therefore, prioritising the target groups can be illustrated in Guideline with the respective (risk) analysis.

#### 4.2.3 "Education Plan"

Steps for implementing the Education Plan and the minimum requirement for ADOs as "measurable and realistic" plan should be explained in Guideline.

4.2.4 We understand all "Current Situation Assessment" is left open to ADOs, especially in relation to resource and cultural considerations. The "minimum" standard of Education can be mentioned and specifically mention what Education is required for those participating in Olympic-Paralympic Games and World Championships/World Cup (IFs' highest competition).

Risk Assessment - better to provide the steps for Risk Assessment, detailed objectives and standard. "Current Situation Assessment"

- It is stated as "WADA's satisfaction": it would be better to specify on what condition the 'satisfaction' can be met. - "Clean sport environment" - provide the descriptions how this looks like so that the objectives of ISE will be clarified.

- "Realist Goals" - we are wondered if "minimum standard" is wider scope than "realistic goals" set by ADOs?- Reactive vs Proactive approach - it would be better to mention the significance and priorities on "Proactive approach" at the beginning of this section.

4.2.5 Better streamline what "Target Groups" mean and what are the objectives to achieve through Education Program.

Target Groups - Categorise Athletes and ASP and prioritisation process can be given examples in Guideline.

<Additional definitions>

Need the definitions on "Young People" and "Young Athletes" - where to draw line between these 2 groups? What are the necessary education program for these overlapped groups with what objectives?

- Coaches - in practice, Athletes are influenced by those Coaches who are not necessarily coached directly. How to approach Coach and requirement on Coach on Anti-Doping can be written specifically.

- (Student) Athletes belonging to the University

More ADRV cases can be found by the University-student athletes. Although they are "Adults" (mentioned in 4.3.8 & Annex B), it would be better to mention regarding the streamlined responsibilities between NF and University and effective approach.

- Include the Public, Sport Fun as Target Group
  - Retired Athletes - good to mention their roles even after they retire from active competition
  - Media - This is wide scope; not sure if Social Media is included. It would be an idea to show what this means and how to approach them in Education - in Guideline?
- 4.2.6- Very important part. The detailed or concrete process and examples can be written in Guideline.  
4.2.8 - Give example and process/steps in Guideline

**NADA**

SUBMITTED

Regine Reiser, Result Management (Deutschland)  
NADO - NADO

**We propose the following Draft Text** (as it relates to that paragraph)

**Risk Assessment:** ‘.....This will provide directions for content emphasis as well as indications of those most at risk of and vulnerable to doping who will be considered as most in need of Education. An assessment of the wider.....’

**Comment (page 18)****We propose the following Draft Text** (as it relates to that paragraph)

**Target Groups:** The Anti-Doping Organization must seek to quantify target groups within their jurisdiction and to identify the stakeholders who could assist with access or engagement to such target groups. This will include recording the overall number of *Athletes*, *Athlete Support Personnel* and other relevant *Persons*, including those stipulated in Article 18 of the *Code* and outlined in 4.2.5. This will help to establish the scale in which the Anti-Doping Organization’s Education Program will be delivered in order to set realistic goals and to prioritize them based on risk in accordance with the Anti-Doping Organizations (sporting) environment.

**Comment (page 19)**

In addition to the target groups stated in the definitions of Athlete and Athlete Support Personnel in Article 3.1, specific target groups shall be considered as part of the Education Program as outlined in Article 18 of the Code include;

- Young people (in schools and sports clubs)
- Youth Athletes
- Sports Science personnel
- Sports Officials
- Team Managers
- Agents
- Media

University Sports Staff/Lecturers.

**Comment (page 20)****We propose the following Draft Text**

‘.....This monitoring should include documented qualitative feedback, and quantification of the Anti-Doping Organization’s Education activities, such as reach and impact metrics such as surveys, digital feedback (social media hits, media coverage, eLearning analytics, etc. and staff reports. The monitoring.....’

**NADA Austria**

SUBMITTED

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

In the comment to 4.2.2, last sentence: The words “related to anti-doping” can be deleted since Education is a defined term.

#### 4.2.4 Current Situation Assessment

We propose the following Draft text:

“Target Groups: The Anti-Doping Organization must seek to quantify target groups within their jurisdiction and to identify the stakeholders who could assist with access or engagement to such target groups. This will include recording the overall number of Athletes, Athlete Support Personnel and other relevant Persons. This will help to establish the scale in which the Signatories Education Program will be delivered in order to set realistic goals and to prioritize them based on risk in accordance with the Signatories (sporting) environment.”

#### 4.2.5 Prioritization of Target Groups

We propose to delete the concept of a mandatory “testing or education pool” that has to be educated at all costs. Each Signatory has to develop and implement an Education plan, prioritize target groups for Education and will be held accountable through the ISCCS to deliver education. It is up to the assessment of Code Compliance to evaluate if the Standard is met. WADA should support all Signatories with a corresponding Guideline.

#### UK Anti-Doping

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

SUBMITTED

4.2.5 - UKAD strongly support this.

#### Irish Sports Council

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

SUBMITTED

4.2.4 It may be very difficult to quantify all stakeholders and this could be a very time consuming task for small ADOs. Sport Ireland suggests instead of quantifying all stakeholders that we identify and quantify target groups.

4.2.5 A number of specific target groups are listed alongside Athletes and ASP. For a small organisation this includes a high level of population to education therefore it might be worth while grouping these into priority groups so that NADO can priorities certain target groups as they may not be in a position to consider all groups listed.

#### Kamber-Consulting

Matthias Kamber, Independent Expert (Switzerland)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

#### 4.2.4 Current situation assessment

The sentence: “The *Anti-Doping Organization* must be able to demonstrate to WADA’s satisfaction that it has made a proper assessment of the relevant risks and has adopted an appropriate Education Plan

based on the results of that risk assessment.” Should not be in an IS. It is not based on clear principles and criteria and leaves doors open for bureaucratic harassment. It should be removed.

### Institute of National Anti-Doping Organisations

SUBMITTED

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

4.2.4 -2 The need to quantify all these groups is demanding (sometimes impossible) and frequently not necessary. For example, the recording of the overall number of Athlete Support personnel is a task which no NADO would currently be able to do with any accuracy. The focus must be on the primary target groups.

### International Paralympic Committee

SUBMITTED

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

4.2.4- The examples provided with regards to the risk assessment are too strict and should be more general. The listed examples requires a bureaucracy to monitor the information that is out of reach of most ADOs. It is strange that the Education risk assessment is more complicated than the Testing risk assessment found in 4.2 of the ISTI.

The requirement to provide education at all international competitions may not be possible for many ADOs.

4.2.5- The standard is being inconsistent in this section, Athlete Support Personnel is a catch-all term in the definition and it is therefore redundant to list additional target groups.

4.2.6- WADA should develop a guideline as to the types of outcomes and indications that should be expected, as many ADOs may not have the resources to engage with educators and academics.

4.2.8- Monitoring, specifically with the detail described, will limit the resources that can be allocated to the actual programme itself. In addition, the metrics described are not even indicators of an effective education programme, but rather indicators of awareness.

## 4.3 Implementing effective Education (11)

### ministère chargé des sports, direction des sports

SUBMITTED

Michel LAFON, Chef de bureau (France)  
Public Authorities - Government

Accreditation and certification systems such as described in the standard are too demanding in terms of organization and means. We think they are also too complex to be implemented.

So our proposals are :

- 

The provision in the article 4.3.9 of ISE is more like a recommendation (“*should endeavor*”) and should be transferred to the ad hoc guidelines.

- 

Should the provision be maintained in the ISE, we propose to modified Art. 4.3.9 of the ISE : *Anti-Doping Organizations should endeavor to employ and train ensure the consistent experience of Education Officers who will be responsible for their educating education programs to their target groups. Education Officers should ideally have experience in education and shall be competent in all the topics outlined in Article 4.3.2, understand how to deliver the framework presented in Annex A and be familiar with the learning principles explained in Articles 4.3.5 through 4.3.8. They should also be competent in Values-Based Education approaches, and all aspects of the ISE and Guidelines for Education. Anti-Doping Organizations should seek to establish an accreditation system for Education Officers with certification, regular assessment and professional development.*

**Council of Europe**

SUBMITTED

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

**4.3 Implementing effective Education****4.3.2 The Anti-Doping Organization shall include the following topics in their Education Program as outlined in Article 18.2 of the Code:***Proposed revision:*

- o Principles and values associated with clean sport
- o Athletes rights and responsibilities
- o Consequences of doping including health, social, psychological effects and the case management process
- o Anti-doping rule violations
- o The prohibited list, including in- and out-of-competition periods
- o Risks with medications and supplements, including health consequences
- o TUEs
- o Testing procedures, including urine, blood and the biological passports
- o Requirements of a registered testing pool, including Whereabouts and use of ADAMS
- o International competition (for those attending a major games or international sporting event)
- o Speaking up to share concerns about doping
- o Importance of anti-doping and its governance, including jurisdiction

**Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

4.3.1 "effective delivery methods for target groups" would be different among ADOs. It would be good to show examples in Guideline or in Comment in ISE.

4.3.2 "Whistle blowing", "cooperating with ADOs for investigations or ADRV-related information" can be included herein (therefore, Code18 should be revised too accordingly).

- Although it is important to specify the areas of Rules-based Education (Information), Values should be included as the fundamental principle of the rules.

4.3.3 - "[these learning outcomes] should be measurable through assessment." - clarify on who does assessment and what kind of measurable assessment would be required? - In 4.3.6. "effective education program" is described. Since assessing the core Life-Skills, multi-modal communication is difficult, "framework" can be specified in Guideline.

4.3.5- As part of overall Education Plan, the outputs and goals of Athletes or different target groups can be mentioned considering the depths and widths and importance of Education are different depending on the target groups. Influences of Athlete Support Personnel including Medical personnel can be mentioned.

4.3.6 It would be ideal to mention the importance of Government roles in delivering school-based programme, campaigns to public and values-based school education.  
 - "effective evidence-based methods of delivery" - this is important but if the examples can be provided in Guideline, there will be more practical understanding.

4.3.7 - Give other examples other than "Backhouse, McKenna & Patterson (2008)" since this was focused on the related areas of Anti-Doping but not directly on Anti-Doping.  
 Providing the below examples would be important but it is unsure if these are effectively provided herein. For example, systematic review highlighted no 'magical ingredients' for ensuring effectiveness, there were common 'recipes for success', including (i) targeting young participants – when attitudes and values are forming; (ii) providing interactive material that develops social skills; (iii) monitoring and delivering programmes with high degrees of fidelity; (iv) basing delivery on well-trained staff; (v) incorporating long-term 'booster sessions' to reinforce key messages.

4.3.9 Anti-Doping Organizations should endeavour to employ and train Education Officers who will be responsible for educating their target groups.  
 --> these descriptions is fine but "train the trainer" and "train the evaluator/ monitoring person" are also key part to ensure the "Education Officer" system.  
 --> Considerations could be given for misconduct or those mis-information given by Education Officers led to ADRV.  
 - Shall to "may"  
 Some smaller NADOs may find difficult to "employ" the educators although it is mentioned as "endeavour to".  
 It would be good to revise to "may train" and then the system or structure for training and employing "Education Officer" can be evolved over a few years, which can be specified in the ISE in a later version.  
 It would be good to require all ADO to publish own accreditation system or Education Officer development programme on the ADO Website, which should be "mutually recognised" between NADO and IF.

### Anti-Doping Norway

SUBMITTED

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

### Measuring knowledge

4.3.3 require an ADO to measure if an athlete has understood the message being delivered. Anti-Doping Norway does not agree with this requirement. A certificate for having received Clean Sport Education could be encouraged but should not be made mandatory. This will require too much efforts from the ADO and will also require measures if the level of knowledge is not as expected.

Some ADOs identify requirements for their athletes to undergo compulsory clean sport education programs. To support such approach other ADOs could be encouraged to "recognize" such education.

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)  
 NADO - NADO

Art. 4.3.2

### Comment (page 21)

References to the Code article 18 need to be changed and the term 'Harm of doping to the Spirit of Sport' should be rephrased using positive language.

The list should also be consistent with the list in Article 18.

### We (have) proposed the following Draft Text for Article 18.3.1

- Principles and values associated with clean sport

- Athletes rights and responsibilities (as they relate to specific anti-doping functions such as testing.
- Consequences of doping including health and social consequences as well as sanctions s
- Anti-doping rule violations
- The prohibited list
- Risks with medications and supplements, including health consequences
- TUEs
- Doping control procedures
- Requirements of a registered testing pool, including Whereabouts and use of ADAMS

**NADA Austria**

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

According to our suggestion, the reference to Article 18 in 4.3.1 would read:

Information programs shall, at a minimum, provide Athletes and Athlete Support Personnel identified as highest priority according to the Education Plan with updated and accurate information on at least the following issues as defined in the International Standard for Education:

- Principles and values associated with clean sport
- Athletes rights (in general as they relate to the Charter of Athletes Rights)
- Consequences of doping including health, social, psychological effects and the case management process
- Anti-doping Rule Violations
- The Prohibited List, including in- and out-of-competition periods
- Athletes and Athlete Support Personnel rights and responsibilities (as they relate to specific Anti-Doping Activities)
- Risks with medications and supplements, including health consequences

- 
- TUEs
- 
- Testing procedures, including urine, blood and the biological passports
- 
- Requirements of a registered testing pool, including Whereabouts and use of ADAMS
- 
- Speaking up to share concerns about doping
- 
- Importance of the anti-doping system

#### 4.3.4 Delivery of Education to Testing Pool

We propose to delete the concept of a mandatory “testing or education pool” that has to be educated at all costs. Each Signatory has to develop and implement an Education plan, prioritize target groups for Education and will be held accountable through the ISCCS to deliver education. It is up to the assessment of Code Compliance to evaluate if the Standard is met. WADA should support all Signatories with a corresponding Guideline.

#### 4.3.7 Mediums for delivering material and Education

The ISE tends to be very specific in certain points, but when it comes to actual delivery, it is rather unspecific. A reference to an Annex with examples (as in the WADC for case studies) would be useful or a reference to a Guideline.

#### Irish Sports Council

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

SUBMITTED

4.3.6 Sport Ireland recommends that Life-Skills be removed from the Standard and encompassed with the Ethical Literacy definition. The Standard needs to streamline the number of terms it is currently referring to. There are a number of terms referred to (e.g. education, prevention, awareness, information, life skills and ethical literacy and values based education) and these could be incorporate together and streamlined in the Standard as there needs to be consistency to which term is being used i.e. switching from prevention to education to values based education to ethical literacy to life-skills makes the document hard to interpret and more clarification is required.

4.3.9 Sport Ireland recommends that "to employ" be removed as many Education Officers that are trained may not be members of a ADO's staff.

#### UK Anti-Doping

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

SUBMITTED

4.3.2 - This list needs updating.

**4.3.5** - Wording should be consistent with the Framework in Annexe A for greater clarity – consider changing 'Recognition' to 'Awareness'.

**4.3.9** - Add in '...accreditation system for Education Officers with certification, regular assessment and quality assurance and opportunities for professional development'

### **Institute of National Anti-Doping Organisations**

SUBMITTED

Graeme Steel, Chief Executive (Germany)

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

4.3.2 This sets put a useful reference list of core topics which must be covered to ensure athletes and others know how to avoid ADRVs. This list may be amended but this seemingly constitutes the mandatory elements of the programme. It does not align with Annex A which goes on to introduce a whole host of additional items which also seem to be mandatory (see following comment under Annexes).

### **Kamber-Consulting**

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)

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

It should state a principle that equivalent or at least comparable treatment of athletes with an impairment. For example, ADO websites must be accessible to athletes with a visual impairment. The technology for this is well established. For further example: printed information about the doping control procedures or athletes' rights and responsibilities for Games-time use must have a multilingual braille or audio version for when athletes with a visual impairment compete.

### **International Paralympic Committee**

SUBMITTED

James Sclater, Director (Germany)

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

4.3.5-6- WADA assumes that ADOs have education experts on staff or have the resources to engage consultants, when in reality many ADOs it is the responsibility of the same staff that manage the testing programme.

4.3.9- While it would be best practice to recruit educators as Education Officers, developing a recruitment and training programme may not be possible many ADOs. This should only be a best practice.

## **4.4 Evaluating the effectiveness of Education (4)**

### **Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)

NADO - NADO

4.4.3 We understand the importance of Evaluation for sure. However "Standardized Survey", which has been put on Website by WADA, could be useful or widely known. In Guideline, the steps for Evaluation - how to do an Evaluation, how to adopt the Evaluation outcome (revising the Education Program) etc - can be given as example.

- Some research quote (like Donovan et al (2015) maybe less effective though we understand the evidence-based descriptions.

### **Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)

NADO - NADO

### **Kamber-Consulting**

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)

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

4.4.3 Standardized Survey: the mentioned survey is certainly suited for some of the more advanced countries, but will not be useful due to cultural differences and different interpretation of certain questions. It is however useful to make similar surveys, but how it is formulated here, it is too strict and just focused on the more developed countries.

### **International Paralympic Committee**

James Sclater, Director (Germany)

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

SUBMITTED

4.4.3 Standardised Survey: the survey is certainly suited for some of the more advanced countries, but will not be useful due to cultural differences and different interpretation of certain questions. It is however useful to make similar surveys, but in this case it is too strict and just focused on the more developed countries.

## **PART THREE: ROLES & RESPONSIBILITIES, COOPERATION AND ACCOUNTABILITY OF ANTI-DOPING (2)**

### **Commonwealth Games Federation Medical Commission**

Michele Verroken, Anti-Doping Administrator (UK)

Sport - Other

SUBMITTED

Overall the Standard seems to be written for NADOs, if the assumption is that NADOs are responsible for the basic education of athletes, then defining the IF and MEO as event based makes more sense – except that requires each NADO to have similar resources to input to each athlete. ADOs contribute to the whole education of athletes at different ages and situations. Could the Standard help with this coordination?

5.2.1 Role of NADOs, add Major Event Organiser after International Federation to emphasise the cooperative approach of all parties. For example IFs at an Olympic Games would look to IOC for leadership in education.

Please explain what is meant by 'Recognition Process'.

5.2.2 why should education only take place at events where testing takes place? where there is an opportunity to educate rather than test, this may be more effective, particularly in preparing young athletes for their career in sport.

5.2.3 MEO education in the lead up to an Event should not be dictated as an obligation on the Local Organising Committee. This body may not have the expertise or resource. MEO could require LOC fund education activities, why duplicate what already exists and MEO may wish to ensure international diversity and objectivity of education activities. LOC is not an anti-doping organisation. this section almost conflicts with 5.3 Cooperation with other Anti-Doping Organisations.

### **Drug Free Sport NZ**

Sian Clancy, Education Manager (New Zealand)

NADO - NADO

SUBMITTED

Article 5 includes the obligations of IFs, MEOs and WADA which is inconsistent with Article 4.

Article 5.1 quotes again, accurately, from WADC Article 18.1 relating to Signatories, though it goes on to refer specifically to Anti-Doping Organisations.

Article 5.2 relates to Roles and responsibilities of Anti-Doping Organisations but includes NOCs/ NPCs which are not ADOs. It may be that this section relates to signatories, but we note this section also includes WADA, which is not a signatory.

Article 5.4.1 a) b. It is not clear how the 'impact of the Education Plan' will be consistently evaluated across NADOs.

## 5.0 Roles & responsibilities of anti-doping organizations (5)

### Department of Health - National Integrity of Sport Unit

SUBMITTED

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

### Council of Europe

SUBMITTED

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

*The roles and responsibilities must match those as outlined in both Article 18 and Article 20, and Article 21. See our comment under Article 3.0*

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)  
NADO - NADO

### Comment (page 25 – 27)

The roles and responsibilities must match those as outlined in both Article 18 and Article 20, and Article 21.

### Anti Doping Denmark

SUBMITTED

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

Part 3, Article 5

The roles and responsibilities must match those as outlined in both Article 18 and Article 20, and Article 21.

### NADA Austria

SUBMITTED

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

The whole section should be inline with the WADC Article 20 and 21. Since we propose some changes there please we propose them here again for consistency:

WADC Article 20.1 Roles and Responsibilities of the International Olympic Committee

We propose the following Draft text:

“20.1.9 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.1.10 To actively encourage NOCs to ensure that Athletes and Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Olympic Games they aim to attend.”

#### WADC Article 20.2 Roles and Responsibilities of the International Paralympic Committee

We propose the following Draft text:

“20.2.9 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.2.10 To actively encourage NPCs to ensure that Athletes and Athlete Support Personnel who are members of the participating countries delegation have been made aware of the anti-doping rules and procedures for the Olympic Games they aim to attend.”

#### WADC Article 20.3 Roles and Responsibilities of International Federations

We propose the following Draft text:

“20.3.12 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.3.13 To require National Federations to develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### WADC Article 20.4 Roles and Responsibilities of National Olympic Committees and National Paralympic Committees

We propose the following Draft text:

“20.4.11 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.4.12 To require National Federations to develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### WADC Article 20.5 Roles and Responsibilities of National Anti-Doping Organizations

We propose the following Draft text:

“20.5.8 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### WADC Article 20.6 Roles and Responsibilities of Major Event Organizations

We propose the following Draft text:

“20.6.7 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

#### WADC Article 20.7 Roles and Responsibilities of WADA

We propose the following Draft text:

“20.7.6 To promote, conduct, commission, fund and coordinate anti-doping research and to support education through the development and promotion of anti-doping tools, resources and programs.”

#### WADC Article 21.1 Roles and Responsibilities of Athletes

We propose the following Draft text:

“20.1.2 to actively participate and engage in Information and Education Programs of a Signatory”

WADC Article 21.2 Roles and Responsibilities of Athlete Support Personnel Athletes

We propose the following Draft text:

“20.2.2 to actively participate and engage in Information and Education Programs of a Signatory”

WADC Article 21.3 Roles and Responsibilities of Regional Anti-Doping Organizations

We propose the following Draft text:

“20.3.6 To develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.

20.3.7 To require member countries to develop and implement an effective, intelligent and proportionate Education Plan in accordance with Article 18.”

## 5.1 Objective (1)

### **NADA Austria**

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

We propose the wording:

5.1.1 All Signatories, shall within their scope of responsibility (as defined in Article 18 and Article 20 and Article 21) and in cooperation with each other, plan, implement, monitor and evaluate Education Programs in line with the principles set out in the International Standard for Education (ISE) to protect clean sport.

## 5.2 Roles & responsibilities of Anti-Doping Organizations (7)

### **International Floorball Federation**

Merita Bruun, Anti-doping Manager (Finland)  
Sport - IF – IOC-Recognized

SUBMITTED

5.2.2 IFs Testing and Education should be kept separate from each other. It is by no means always smart to educate athletes at all the events where there is testing.

At some events there are national teams, others are for club teams (lower level), some events are only 1-2 day events, others 10 days, some involve only 1 IF staff members etc. etc. Also the same athlete might participate in a number of international events within a short period of time.

To conclude: There might be a reason to organise doping control at the event, but not smart to organise education at the same event. The best learning result is achieved when the target groups are involved in the planning process

### **World Rugby**

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

SUBMITTED

## 5.2.2 – Roles and responsibilities of International Federations

We would prefer that this decision is left to the IF. For example, World Rugby conducts testing at all rounds of its annual men's and women's Sevens World Series, but it would not consider it to be a good use of resources for itself or the NADO to repeat education before, or at every round of the series, given that the players will usually attend several consecutive (if not all) rounds of a Series, and may represent their country on the Series for several years.

### ministère chargé des sports, direction des sports

SUBMITTED

Michel LAFON, Chef de bureau (France)  
Public Authorities - Government

The main point is that the coordination of prevention's policies is given to the NADOs (art. 18.5 and 20.5.9 of the draft code) and that they shall be the authority on Anti-Doping and education within their respective countries ((point 5.2.1 ISE). In some countries such as France, this provisions could be difficult to implement for legal and political reasons. Among this, the legitimacy of the NADO to lead a interministerial policy is not consistent. In France, the sport ministry is more legitimate to coordinate a national policy with the ministry of education, health and youth. This organization ensure the effectiveness of that policy. That's why, in our country we have a steering committee for anti-doping education plan and program, chaired by the ministry attended by the NADO and other actors.

So, our proposals below give more flexibility for the countries :

- 

Art. 5.2.1 of the ISE :

~~The *National Anti-Doping Organization* shall be the authority on anti-doping and Education within their respective countries.~~

The *National Anti-Doping Organization* shall devise a program that focuses on target groups who are under their jurisdiction. This includes all youth athletes, competitive athletes, national level *Athletes, Athlete Support Personnel* and other *Persons* cited in Article 18.2 of the *Code* and outlined in Article 4.2.5 above. They may have a role in educating *International-Level Athletes* in cooperation with the relevant International Federation. They may also have a role in educating young people through the school curricula in cooperation with their governments and ministries, in line with the *Code* and The International Convention against Doping in Sport. This may include an advocacy role, which focuses on promoting the integration of Values-Based Education into the existing education system.

### Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

- Roles & Responsibilities of Government in Education can be mentioned.

5.2.1-5.2.4

Each Signatory's roles and responsibilities are described but not clear.

If those roles and responsibilities are not met, an ADO will be declared non-compliant?

5.2.1 Introducing "Sport Values-Based education" in School Curricular cannot be mandatory but it is desirable.

5.2.2- If ISE requires the IF to organise Event-Based Education for all international competition, it will be less effective and unrealistic. Hence, it should be mentioned that IF are required to "publish" which events are planned for IF's Event-Based Education with objectives and what requirements they request the participating Athletes and ASP (as per ISTUE, ISTI). \*JADA x IF partnership programme is well progressed. Such examples could be given in Guideline as a good practice.

- Much clearly state the roles and responsibilities of IF-NF (or Local Organising Committee) on Event-Based Education (not relying on the delivery of local NADO even NADO can assist). This is to avoid the current on-going struggles on streamlining responsibility of IF and NADO at an international

competition held in the country. One consideration for clarity is to set "collaboration criteria" by NADO to IF, like making sure the role model athletes to act as the communicator to fellow (young) athletes.

5.2.4 For Olympics and Paralympics, it is the responsibility of NOC/NPC/NF to deliver an Anti-Doping (rules-based) Education session in cooperation with NADO. It might be good to mention here that NOC/NPC has the responsibility not to select those athletes/ASAP unless they are required to undergo the designated session held by NOC/NPC.

To revise1 Paragraph - The NOC will be the => The NOC/NPC will be the ...

5.2.5 When the ISE is implemented, it is expected that the roles of RADO Office would become heavy loaded. More specific roles and responsibilities of RADO can be mentioned - for example, RADO train the RADO "Education Officers" who will become the trainer in the region.

### **AFLD (Agence française de lutte contre le dopage)**

SUBMITTED

Catherine Coley, Director, Communications and prevention (France)  
NADO - NADO

#### 5.2.3 Major Event Organizations

The *MEO* shall conduct Event-Based Education at all *Events* under their control where they are the *Testing Authority*. In order to increase the effectiveness of education, MEOs shall require *Athletes* and *Athlete Support Personnel* competing and participating at their *Events* to be informed on anti-doping ahead of the event. This shall be made a requirement for the *Local Organizing Committee* and ~~should~~ **shall** be done in cooperation with the *National Anti-Doping Organization as the national coordinator of the education system*, and relevant *International and National Federations*."

5.2.6 World Anti-Doping Agency (WADA) WADA shall ~~promote Education~~ **provide support and guidance on Education programs** as per Article 20.7.6 of the Code.

### **Kamber-Consulting**

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)  
Other - Other (ex. Media, University, etc.)

#### 5.2.3 MEOs

"...MEOs shall require *Athletes* and *Athlete Support Personnel* competing and participating at their *Events* to be informed on anti-doping ahead of the event." Yes, but then the MEOs have to finance such education to the organizations that are carrying out these programs.

5.2.4 This article is crucial, but what happens when a NOC/NPC has not the resources to do it (or only limited resources that do not cover a comprehensive program)? Or what happens to countries that do not do it appropriately? Will these athletes and their support personnel be excluded from the event? These questions should be addressed.

### **International Paralympic Committee**

SUBMITTED

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

5.2.3- This places a large burden on MEOs, given the different types of countries and languages. 5.2.4- This article is crucial, but what happens when a NOC/NPC has not the resources to do it (or only limited resources that do not cover a comprehensive program)? Or what happens to countries that do not do it appropriately? Will these athletes and their support personnel be excluded from the event? These questions should be addressed.

## **5.3 Cooperation with other Anti-Doping Organizations (3)**

### **World Rugby**

SUBMITTED

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

### 5.3.2 – Mutual recognition.

Although not mandatory this recognition process would seem a very good idea, however it would be very difficult to achieve in practice without some quality scheme or auditing process run by WADA or a similarly independent group/organisation, unless the intention is that this is clarified through the Code compliance process. The comment to 5.2.2 suggests that *International Federations are required to ensure that Event-Based Education programs conducted on their behalf by other Anti-Doping Organizations or National Federations are done so to a high standard*, but although laudable in intention, this would seem difficult without the IF conducting its own auditing, which in most cases would be cost-prohibitive.

As a related-point, there would also seem to be considerable need for a system to monitor when an athlete has been subjected to such an accredited programme without the ADO having to contact multiple other ADOs in order to discover this information. This is something that should be captured on ADAMS as a form of education passport. This would also prevent athletes from repeatedly being subjected to the same education/information from different sources.

### Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

5.3.2"Mutual Recognition" - more details are necessary since there are some confusions. Process on mutual recognition including the criteria for collaboration by NADO, publicising the IF's Education Plan and Objectives and international event with the Event-Based Education. NADO can also share the same planning.

### UK Anti-Doping

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

SUBMITTED

5.3.2 - This concept is supported however we would propose that WADA could take the lead on this. Otherwise, similar to the TUE mutual recognition process each individual ADO will have to undertake its own assessment as to whether or not it will recognise another ADO's programme. WADA could do this job once, publish on its website and then monitor as part of the compliance audit process.

## 5.4 Accountability (3)

### World Rugby

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

SUBMITTED

Is this intended to be a summary of the actual (compliance) requirements on each ADO, in other words those baseline criteria by which an ADO will be considered compliant or not with the Standard? If yes, this would seem quite light given the extensive detail contained in the standard around delivery, content and responsibilities related to education programmes. It's a lot of content if in the end this is all ADOs are being held accountable for. Also would point (a) not be part of point (b)?

### Education Plan.

Whilst the education plan is critical, there needs to be a more efficient means of sharing these documents, or housing them in a central location. Otherwise ADOs may have considerable difficulty in obtaining the plans of all the other ADOs with whom it works.

**Japan Anti-Doping Agency**  
YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

Evaluation process and format should be in Guideline

**UK Anti-Doping**  
Pola Murphy, Compliance Coordinator (United Kingdom)  
NADO - NADO

SUBMITTED

**5.4 (b)** - We would welcome further detail of the consequences of non-compliance with the ISE, with clarity on the sanctions that could be applied.

## 6.0 Education Outcomes (5)

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

SUBMITTED

*Reference to safeguarding or protecting an Athletes health should be made overtly as an outcome of the Education Program.*

**Japan Anti-Doping Agency**  
YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

- Define "Clean Sport Environment" - what are the criteria, what does this look like? The descriptions should be on values-based.

**NADA**  
Regine Reiser, Result Management (Deutschland)  
NADO - NADO

SUBMITTED

### Comment (page 28)

Reference to safeguarding or protecting an Athletes health should be made overtly as an outcome of the Education Program.

**NADA Austria**  
Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

Education is already a defined term in the WADC or ISE, so there is no need to define it again with other words.

**Anti Doping Denmark**  
Jesper Frigast LARSEN, Legal Manager (Denmark)  
NADO - NADO

SUBMITTED

Article 6.0 Education Outcomes.

*Reference to safeguarding or protecting an Athletes health should be made overtly as an outcome of the Education Program.*

## PART FOUR: ANNEXES (8)

### World Rugby

SUBMITTED

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

We would have some minor proposed modifications to Annex A, however given that this is a guideline and therefore non-mandatory, there would seem little benefit in including these here. None would diverge from the topic headings provided in section 4.3.2.

### China Anti-Doping Agency

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

Like other International Standards, International Standard for Education should be a more mature standardization system, attaching particular importance to operability. Similar to the International Standard for Testing and Investigations, it is recommended to add relevant appendixes, introducing the basic processes and requirements for WADA and other anti-doping organizations in carrying out their respective educational activities, as a guide and model of best practice for anti-doping education.

### Commonwealth Games Federation Medical Commission

SUBMITTED

Michele Verroken, Anti-Doping Administrator (UK)  
Sport - Other

the framework reads like a syllabus for Doping Control Officers!!  
Input from educators would improve this section. e.g. "use mental triggers which link similar chemical substances based on the chemical suffix"this does not take account of the different ages and intellectual capacities of athletes. Ultimately what does it mean? how will it be measured? what happens as List changes?

Part 4 Annex should be more practical and competence based to empower athletes and ASP to understand the process. How to ensure unique numbering and sealing of samples. How to check medications at home and abroad. How to apply for a TUE and when.

Given the importance of whistleblowing – should there be a learning outcome on how to raise concerns? What about how to respond to an allegation of a missed test, filing failure or adverse analytical finding?

### Japan Anti-Doping Agency

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

What is it Annexes plays a role in ISE and in Guideline?

### Drug Free Sport NZ

SUBMITTED

Sian Clancy, Education Manager (New Zealand)  
NADO - NADO

As priority audiences in the ISE also include non-adult athletes, we would like learning principles for adolescent athletes to also be made available as an additional Annex.

### Kamber-Consulting

SUBMITTED

Matthias Kamber, Independent Expert (Switzerland)  
Other - Other (ex. Media, University, etc.)

The annexes are rather annexes for a Guideline and not for an IS and can be removed.

### International Paralympic Committee

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

SUBMITTED

The annexes are rather annexes for a Guideline and not for an IS.

### Institute of National Anti-Doping Organisations

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

SUBMITTED

Annex A While this is an impressive and well thought out document it is simply far beyond a/ what is practical and b/ what is necessary to ensure athletes do not commit ADRVs (the most basic ambition of an education programme). Furthermore, in many environments it's inclusion in this form will be counterproductive. I would challenge any current ADO to be able to show that more than a tiny percent of athletes who complete their education programme can (for example) understand "the term chemical structure or biological effects" and explain that a day following receipt of the information. If that cannot apply in the best programmes we currently have how can we make it part of a mandatory standard for all? (Numerous other examples could be drawn.) This information may be nice to know but is not essential for an athlete. Where there is the opportunity for a number (many) hours of engagement with an athlete this programme may be applicable and of benefit. Practically many hours of access to an athlete (either in person or online) is the exception not the norm (and this is unlikely to change in the medium term). The more common scenario is a limited window of time (maybe an hour - often less) with an athlete and trying to run a programme like this will actually be counterproductive as the volume of information will distract from the core that is necessary. This document should be retained as a model of best practice but it simply cannot remain as a mandatory requirement (far exceeding what is listed elsewhere in the Standard) if this is to be regarded as in any way a practical (or even useful) document. A stepping stone to this best practice model, building on the items set out at 4.3.2 needs to be developed urgently to accompany the next version of the Standard.

## Annex A – Learning Framework for Testing Pool Athletes, Athletes competing at International Events and their Support Personnel (2)

### Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

SUBMITTED

Annex A example could be misunderstood by some ADOs because there are no description on a wider range of target groups but only Testing Pool Athletes & different performance level of athletes.

- Unclear on how to adapt/ utilise this AnnexA. This AnnexA should have more linkage with the Objectives of ISE.
- JADA is setting the overall Education Framework both for Anti-Doping rules and Values-based with "Phases" x Target (wider target including the Public and School Youth) x Education Objectives x Methods. This example can be used in AnnexA as an alternative example and Guideline.

<Prohibited List>

- Better to include more "behavioural change" perspective. The aspect of "understanding" of the List does not to be too details.

<ADRVs, Sanctions, Strict Liability>

- Mention in "Is able to" - to obtain from where the accurate and up-to-date information.- "has knowledge of"
- can include different sanctions

<TUE>

- Is aware of - Athlete right can be included

<Supplement> - include the point on risk management

Athlete Roles and Responsibilities should be included

**UK Anti-Doping**

SUBMITTED

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

We appreciate the acknowledgement expressed. Further practical examples as to how this could be applied should be presented in the revised Model Guidelines.

**Annex B – Adopting Principles of Learning for Adults (2)****Japan Anti-Doping Agency**

SUBMITTED

YaYa Yamamoto, Senior Manager (Japan)  
NADO - NADO

- Learning for Adults are wide scope and targeting those intentional dopers without morals or ethical skills has the most difficult approach. Hence, it would be better to provide more detailed examples in Guideline.  
- It would be better to give more clarities on the usefulness on "pedagogy" and "andragogy".  
- Other than "Learning for Adults", Social Desirability Response (SDR) could also be mentioned/ referred.  
(Ref)

Social Desirability and Doping 1

Running Head: SOCIAL DESIRABILITY AND DOPING

Substantive and Methodological Considerations of Social Desirability for Doping in Sport

Daniel F. Gucciardi, Geoffrey Jalleh, and Robert J. Donovan

[http://www.danielgucciardi.com.au/uploads/9/7/3/6/9736343/gucciardi\\_jalleh\\_&\\_donovan\\_\(2016\)\\_social\\_de](http://www.danielgucciardi.com.au/uploads/9/7/3/6/9736343/gucciardi_jalleh_&_donovan_(2016)_social_de)

**UK Anti-Doping**

SUBMITTED

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

Further practical examples as to how this could be applied should be presented in the revised Model Guidelines.