

CCES Submission to International Standards Second Review Phase: International Standard for Education (ISE)

In response to WADA's request for comments as part of Phase 2 of the International Standards review process, the CCES submitted the following comments with respect to the **International Standard for Education (ISE)**.

1.0 Introduction and Scope

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

3.0 Definitions and Interpretation

3.2 Defined terms specific to the International Standard for Education

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

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

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

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

Part Two: Standards for Education

General Comments to Part Two

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

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

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

4.0 Planning Effective Education Programs

4.2 Current Situation Assessment

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

4.3 Prioritizing Target Groups

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

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

5.0 Implementing Effective Education Programs

5.2

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

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

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

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

5.6

Article 5.6 says that “Signatories shall take particular note of the need to tailor Education activities to Athletes with impairments...” but does not imply any specific action nor implications for compliance or program delivery. Perhaps this Article should be clearer and more direct in the obligation to provide

such education: “Signatories shall tailor Education activities to Athletes with impairments and other target groups within the Education Pool in order for them to be able to fully access and experience Education as required.”

5.7

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

5.9

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

5.10

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

8.0 Cooperation with and Recognition of other Signatories

8.2

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