



# SPORT + RECREATION ALLIANCE

## DCMS Tailored Review of UK Anti-Doping (UKAD)

*Submission by the Sport and Recreation Alliance*

### **The Sport and Recreation Alliance**

The Sport and Recreation Alliance believes that the power of sport and recreation can change lives and bring communities together. Together with our members and in partnership with the wider sector, we make the most of opportunities and tackle the areas that provide a challenge. We provide advice, support and guidance to our members and the sector, who represent traditional governing bodies of games and sport, county sports partnerships, outdoor recreation, water pursuits, and movement and dance exercise. As the voice of the sector, we work with Government, policy makers and the media to make sure grassroots sport and recreation grows and thrives. Having an active nation is important as it delivers huge benefits to society and the millions of participants, volunteers, staff and spectators.

### **General comments**

We very much welcome the opportunity to comment on the review. Although our focus is on grassroots sport, we believe that high performance sport can inspire and encourage others to participate and as a result it is essential that UKAD is effective and retains the confidence of athletes and wider sports stakeholders. In this context, the review provides an important opportunity to take stock and identify what has worked well and any areas for future improvement.

While the Alliance response represents the broad views across our membership, we recognise that individual members will provide additional, specific feedback on the review based on their own experience of working with UKAD. As such, the Alliance response should be read alongside those of our individual members.

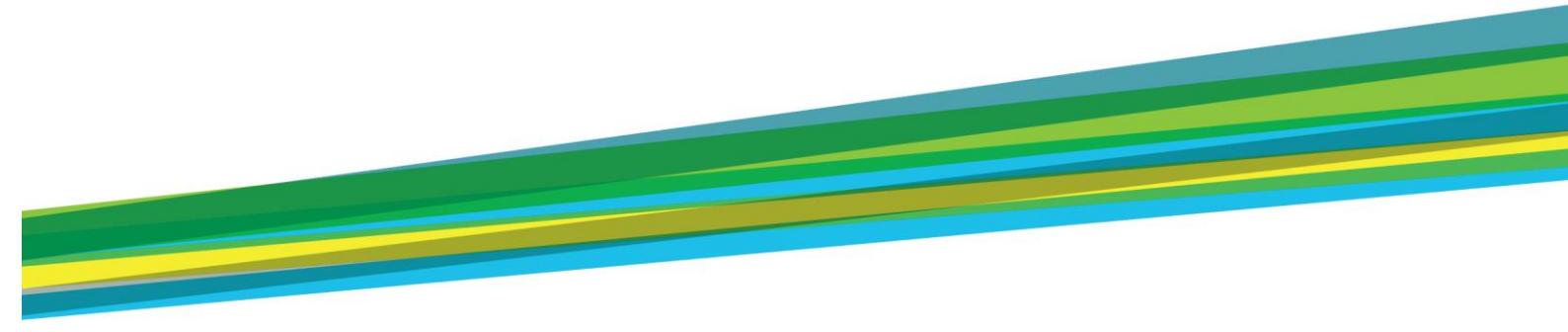
### **Comments on specific questions**

Where appropriate, we have responded to the relevant questions set out in the online questionnaire below.

### **SECTION 1 - About you**

***Q4 Are you responding as an individual or does this response represent the views of an organisation?***

Organisation.



**Q5 What is the name and address of the organisation?**

Sport and Recreation Alliance  
Burwood House  
14-16 Caxton Street  
London  
SW1H 0QT  
United Kingdom

**Q6 We may wish to contact you in order to discuss your response in more detail. If you are happy to be contacted, please provide your details below. If not, please move on to the next question.**

Emma Boggis  
Chief Executive  
[eboggis@sportandrecreation.org.uk](mailto:eboggis@sportandrecreation.org.uk)  
0207 976 3900

**Q9 Which of the following best describes your organisation?**

Other (please specify) – Representative body.

**Q13 Is your organisation linked to a specific sport?**

Yes – with multiple sports.

**Q15 Which of these areas are you mainly based or work in?**

London-based but work across much of England and Wales.

**SECTION 2 - Your contact with UKAD**

**Q31 The 100%me education programme is a UKAD service, were you aware of this?**

Yes.

**Q36 In your view which is the most appropriate organisation to deliver anti-doping education to athletes, coaches and support personnel?**

Other (please specify) – Combination of UKAD and NGBs and schools, colleges and universities.

**Q37 Considering everything, in general, how satisfied/dissatisfied are you with UKAD's education and awareness raising programmes?**

Somewhat satisfied.

**Q38 Thinking about the different types of materials used to convey clean sport information, how satisfied/dissatisfied are you with the following anti-doping resources provided by UKAD in the last 12 months? (For each of the eight statements on the left hand side, select your answers from the top of the grid)**

	Extremely satisfied (1)	Somewhat satisfied (2)	Neither satisfied nor dissatisfied (3)	Somewhat dissatisfied (4)	Extremely dissatisfied (5)	Don't know (6)
1. UKAD website (1)		X				
2. Global Drug Reference Online (UK) (2)						X
3. Report Doping in Sport (3)						X
4. Updates on Twitter (4)		X				
5. Posters (5)						X
6. Updates on Facebook (6)						X
7. Updates on YouTube (7)						X
8. Clean Sport app (8)						X

**Q39 How would you prefer to receive information about anti-doping? (Please select up to three options)**

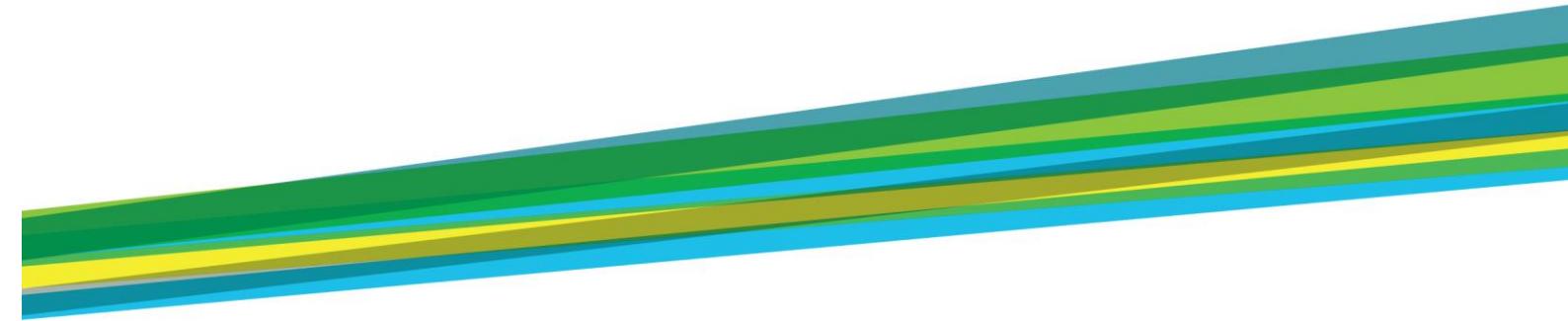
- Website
- Online interactive tutorials / e-learning
- Seminars and presentations

**Q46 What direct contact have you had with UKAD staff over the last 12 months? (Select all that apply)**

For general information on anti-doping matters.

**Q47 In your dealings with UKAD please state whether you agree/disagree with the following statements? (For each of the four statements on the left hand side, select your answers from the top of the grid)**

	<b>Strongly agree (1)</b>	<b>Agree (2)</b>	<b>Neither agree nor disagree (3)</b>	<b>Disagree (4)</b>	<b>Strongly disagree (5)</b>	<b>Don't know (6)</b>
1. The information and advice provided by my contact(s) at UKAD are normally helpful to me in my role (1)		X				
2. I am satisfied with my dealings with UKAD and the responses I receive to enquiries (2)		X				
3. My contact(s) at UKAD are timely in getting back to me (3)		X				
4. I would like more regular contact from UKAD (4)			X			



## SECTION 3 - UKAD as an organisation

**Q50 How strongly do you agree/disagree with the following statement about UKAD's status as a public body? "It is the right thing to do to have a public body like UKAD which undertakes anti-doping measures, with core funding from government"**

Strongly agree.

**Q51 Why do you feel this way?**

Having UKAD as a public body with core funding provided by Government is important in ensuring that anti-doping is given appropriate importance and prominence at senior Government level and in the eyes of sport and the wider public. In addition, Government funding provides a degree of independence from sport which is important in enabling UKAD to carry out its functions effectively.

**Q54 These are the activities which UKAD routinely carries out:**

- **Advising Government on National Anti-Doping Policy and support for WADA (World Anti-Doping Agency)**
- **Programme of testing athletes**
- **Providing scientific and medical advice and research Education and athlete support programmes**
- **Intelligence and investigation into doping**
- **Helping NGBs and Home Country Sports Councils to comply with the National Anti-Doping Policy**
- **International assistance to other National Anti-Doping Organisations on a commercial basis**
- **International assistance to other National Anti-Doping Organisations on a pro bono basis**
- **Working with major events organisers (testing, consultancy, planning)**

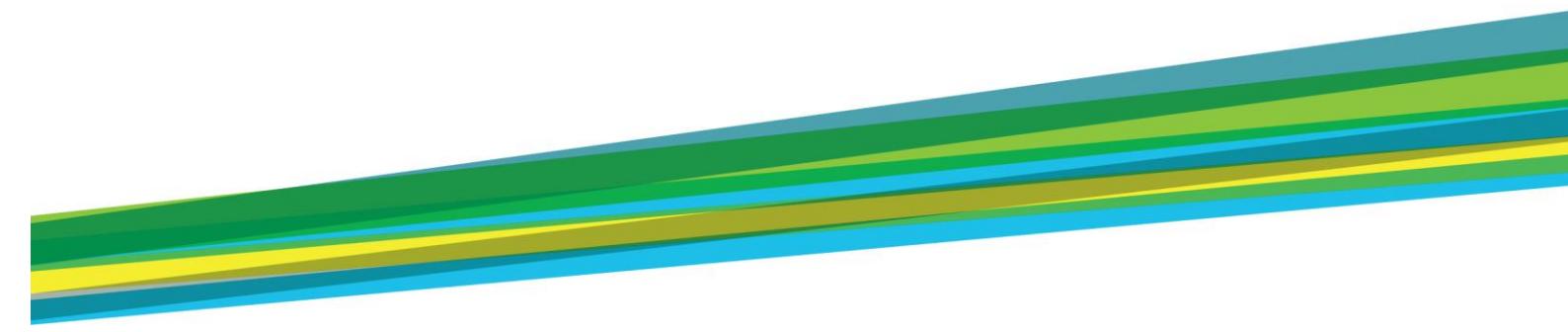
**Thinking of the activities above, which of the following statements do you agree with?  
Select one)**

UKAD's activities are about right.

**Q58 Funding for UKAD has been protected in real terms throughout the current Parliament. If UKAD needed more resources and these were not provided by Government, where would you suggest that increased resources for more UKAD activity should come from? (Select all that apply)**

Increased UKAD commercial activity, charging for services

New fees for assurance activities, for example via licensing of sports events



**Q59 Thinking about UKAD's functions, are there areas where other organisations could do more to support UKAD in delivering clean sport? (Select up to three choices)**

Programme of testing athletes

Helping NGBs and Home Country Sports Councils to comply with the National Anti-Doping Policy  
Working with major events organisers (testing, consultancy, planning)

**Q61 Programme of testing athletes - which type of organisation could assist?**

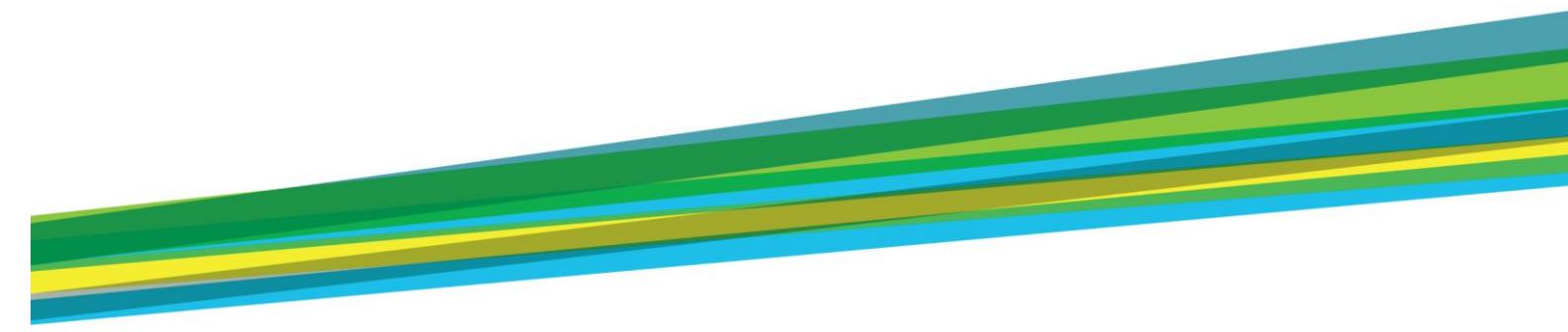
NGBs may be able to assist in terms of supplementing UKAD testing with additional, specific testing where appropriate (but see answers to Q74 and Q98 below).

**Q70 How strongly do you agree or disagree with the following statement? "Sports bodies and event organisers who consistently break anti-doping rules should incur sanctions"**

Strongly agree.

**Q71 Thinking about potential areas for cost savings in UKAD's operations, how strongly do you agree/disagree with the following statements? (For each of the four statements on the left hand side, select your answers from the top of the grid)**

	Strongly agree (1)	Agree (2)	Neither agree nor disagree (3)	Disagree (4)	Strongly disagree (5)	Don't know (6)
1. To avoid any conflicts of interest, UKAD's operations should be run independently of other sporting organisations (1)			X			
2. UKAD should share back office functions with other sporting organisations (2)		X				
3. UKAD should share back office functions with other non-sporting public organisations (3)		X				
4. UKAD should be based outside London and the South East (4)			X			



*Comment to Q71:* We believe it is important UKAD operates independently and is accountable for its decisions in relation to delivery of the national anti-doping programme. Nonetheless, we consider that this should not preclude UKAD from exploring the opportunities to share relevant back office functions with other organisations, including sports organisations, in order to deliver further efficiencies.

***Q72 Overall, do you consider that UKAD represents good value for money?***

Probably yes.

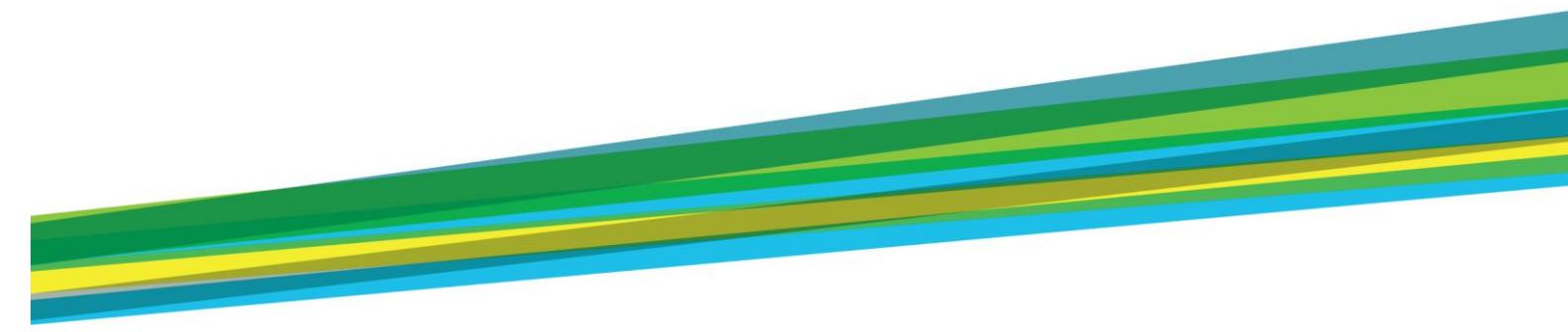
***Q73 Like many UK public bodies, UKAD is encouraged to charge for its services where appropriate and to generate more resources for clean sport activities. In which areas do you think UKAD could seek to generate more income? (Select all that apply)***

Exploring sponsorship of education programmes  
Providing consultancy for other National Anti-Doping Organisations  
Testing programmes at Major Events  
Value-in-kind partnerships

***Q74 If you have any comments about UKAD and its current or potential commercial activities, please detail below.***

We would make the following points in relation to UKAD's current and potential future commercial activities:

- A number of NGBs purchase additional testing from UKAD to supplement the core testing UKAD provides. Based on feedback from members, there is concern that the costs of drug testing has risen substantially in recent years and we understand that the costs of testing at the Kings College London lab are significantly higher compared to the costs of testing undertaken at other facilities across Europe. Given the responsibility on NGBs to maximise the amount of money reinvested in the development of grassroots sport, both core and additional testing must demonstrate it is value for money. In this context, we feel there is a case for disaggregating and benchmarking the costs of various tests and their constituent elements (e.g. urine and blood, in and out of competition, lab analyses and courier costs) against international comparators to identify opportunities to reduce costs. Further, there may be value in reviewing whether or not tests can be undertaken at facilities other than Kings College London, providing minimum standards can be met.
- Looking forward, while we understand the importance of UKAD generating additional income to support its activity, it is important it does not impair UKAD's focus on delivering its core functions to ensure, so far as is possible, sport in the UK is clean and that the national anti-doping programme is run efficiently and effectively. In this context, consideration should be given to ensuring a sufficient degree of separation exists between income generation activities and core functions.



**Q75 Thinking about the vision, mission and objectives above, do you think the focus of UKAD is broadly in the right place?**

Yes.

**Q77 By ‘clean’ we mean that competitive sports are free from the illegal use of performance enhancing substances and methods by athletes in sports known as doping. On balance, do you think sport in the UK is clean?**

Yes.

*Comment to Q77:* While we understand this is a question designed to elicit an overall view of the current climate in UK sport, it nonetheless highlights the broader issue of how success in anti-doping is measured and communicated. At present, we are aware that UKAD reports progress against a number of KPIs however these are primarily input- or compliance-focussed, rather than output- or outcome-focussed. We would therefore encourage UKAD to consider developing KPIs that track performance of the national anti-doping programme in terms of its impact on doping prevalence and/or athlete and wider stakeholder perceptions of effectiveness.

**Q80 By ‘doping’ we mean the illegal use of performance enhancing substances and methods by athletes in sports. How confident are you in UKAD’s ability to detect doping?**

Confident.

**Q82 How effective do you feel UKAD has been in deterring athletes and support personnel from using/supplying prohibited substances and methods?**

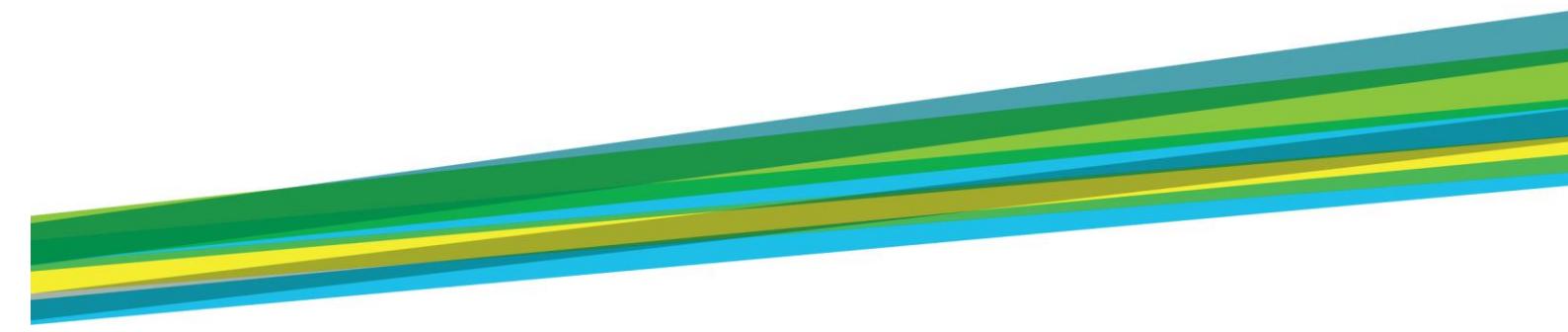
Moderately effective.

**Q84 How satisfied are you with UKAD’s responses to doping issues over the last 12 months?**

Somewhat dissatisfied.

**Q85 If you have any further comments on this or any recommendations, please detail below.**

We believe it is important that UKAD, like any other sports body, is transparent and accountable for its actions, including where things have gone wrong. While sports national governing bodies are ultimately responsible for the integrity of their respective sports, UKAD has a central role in the delivery of the national anti-doping programme through its carrying out of testing, results management and education. In this context, where a doping problem arises or is uncovered, UKAD must also be subject to scrutiny in order to ensure lessons can be learned and improvements to the anti-doping regime can be identified quickly. In the longer term this should provide confidence to all stakeholders that systems are being continually reviewed and improved.



From a transparency perspective, as noted in our response to Q74 above, we believe it is important for UKAD to publish information on its costs to enable benchmarking and to identify further opportunities to drive value for money.

***Q87 Overall, how well do you think UKAD performs as an organisation?***

Moderately well.

***Q88 How influential do you consider UKAD in comparison to other National Anti-Doping Organisations?***

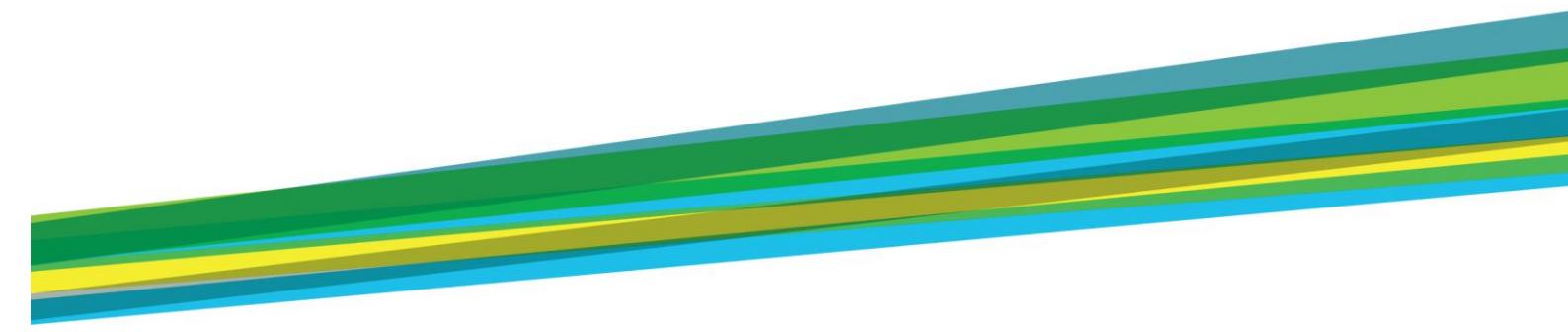
Don't know.

***Q89 In order to achieve a level playing field for athletes in international competition, how important do you think it is for UKAD to have a strong influence on international doping policy and approaches?***

Extremely important.

***Q94 Do you think UKAD should work with the following sectors to promote 'clean sport and physical activity' (For each of the statements on the left hand side, select your answers from the top of the grid)***

	<b>Yes (1)</b>	<b>No (2)</b>	<b>Don't know (3)</b>
1. Sports supplement industry (1)	X		
2. Pharmaceutical companies (2)	X		
3. Gyms and fitness industry (3)	X		
4. Amateur sports endurance events (cycling, cross-fit, outdoor challenge events etc) (4)	X		
5. Martial arts, such as Mixed Martial Arts (MMA) (5)	X		
6. Dance (6)	X		
7. Other (if applicable, please specify) (7)			



*Comment to Q94:* While we have indicated that we believe UKAD should work with all sectors to deliver its objectives, it is important that limited resources are targeted efficiently. In this context, we are of the view that UKAD's should as a priority work with those sectors most closely associated with doping in high performance and elite sports, notably the sports supplement industry and pharmaceutical companies. The remaining sectors (with the exception of mixed martial arts) are largely focussed on amateur sport and in these sectors, UKAD's involvement should probably be less of a priority, perhaps focussing on education, awareness raising and information sharing with relevant partners e.g. public health agencies.

**Q95 Doping is considered a threat to the integrity of sport competitions. Some countries run anti-doping activities alongside other sports integrity functions. Which of the following statements do you agree with?**

UKAD should stand alone as an organisation with a sole focus on anti-doping.

*Comment to Q95:* The Alliance chairs and provides the secretariat to the Sports Betting Group which brings together representatives from sport to share information and good practice on betting corruption. In our view, the existing arrangements regarding betting integrity work well and, in line with the [Sports Betting Group Code of Practice](#), all major sports have well-established rules and sanctions in place alongside a designated point of contact on betting integrity issues. We are therefore of the view that further structural change and/or a transfer of responsibilities on integrity matters is unnecessary and, with regard to betting integrity, could in fact undermine the progress that has already been achieved. Nonetheless, it is important to ensure that information and good practice on managing sports integrity risks is shared between different organisations and we would be happy to engage further if this would be helpful.

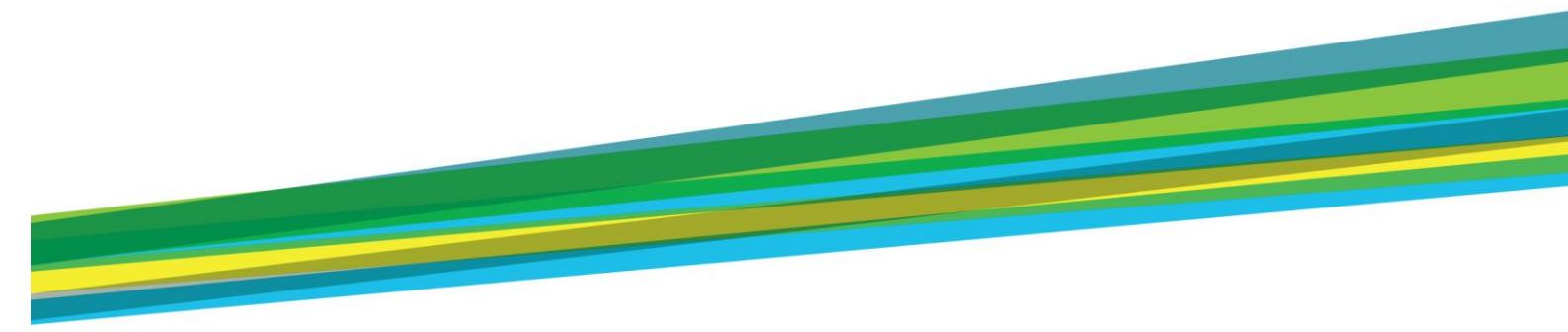
**Q97 By 'doping' we mean the illegal use of performance enhancing substances and methods by athletes in sports. By 'clean' we mean that competitive sports are free from the illegal use of performance enhancing substances and methods by athletes in sports known as doping. Which term for anti-doping work do you find more helpful?**

Clean Sport.

**Q98 If you have anything else you wish to say about UKAD's work, please detail below.**

We would make the following additional comments:

- UKAD's funding must ensure that the national anti-doping programme is genuinely effective i.e. it has sufficient breadth in terms of coverage but also sufficient depth in terms of the extent and sophistication of testing and education provided to participants. It also means ensuring that UKAD's staff have the skills, capabilities and systems required to deliver the highest integrity standards. Against this background, and having consulted with our members, we are of the view that the existing funding levels are insufficient to achieve these objectives and that Government should



consider increasing UKAD's core funding, albeit recognising that any such decision needs to be set against the scope for further efficiencies e.g. in testing identified above.

- Alongside additional funding, we believe it is important that the scope of UKAD's activities is clearly defined to prevent any 'mission creep' and ensure that limited resources are targeted to best effect. In this context, it is important to identify the potential for partnership working with other organisations, for example to deliver education, but also to identify areas where other bodies have a primary role to play, either in regulating the conduct of certain participants (e.g. professional bodies such as the General Medical Council) or in terms of education and awareness raising (e.g. public health agencies).
- We are conscious that Government has commissioned a review which may ultimately lead to doping being made a criminal offence. In our view, such a change would present significant legal and regulatory challenges and our strong preference would be to maintain the existing sports regulatory framework with use of the law reserved for instances involving serious criminality e.g. trafficking and similar offences.

**Sport and Recreation Alliance**

**May 2017**