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Ref: FOI-471

Sent via email only:

23 April 2025

- 1. Thank you for your email of 26 February 2025 in which you requested information from UK Anti-Doping ('UKAD') under the Freedom of Information Act 2000 ('the Act'). Specifically, your request was as follows:
 - 1. The number of reports through the protect your sport system in the years: 2020,2021,2022,2023 and 2024.
 - 2. The number of tests in the 2024 Olympics and Paralympics and the age, ethnicity and gender of sportsperson the test was administered on.
 - 3. The number of positive drug tests in the 2024 Olympics and Paralympics and the age, ethnicity and gender of the sportsperson.
 - 4. The number of drug tests administered during the 2024,2023,2022,2021 and 2020 football seasons.
 - 5. The number of tests and the age, ethnicity and gender of sportsperson the test was administered on during the 2024,2023,2022,2021 and 2020 football seasons.
 - 6. The number of positive drug tests during the 2024, 2023, 2022, 2021 and 2020 football seasons.
- 2. On 24 March 2025, in response to a request from UKAD, you provided clarification of your request. You clarified that parts 4, 5 and 6 of your request relate to tests conducted in men's and women's football, under the jurisdiction of The Football Association ('The FA'), across the 2020-21 to 2023-24 football seasons (inclusive).

Summary of Response

- 3. UKAD confirms that, subject to the explanations provided below, it holds some of the information relevant to your request.
- 4. In relation to Part 1 of your request, the information is exempt under Section 21 of the Act as it is information reasonably otherwise accessible to you.
- 5. In relation to Parts 2 and 3 of your request, UKAD does not hold the information requested.
- 6. In relation to Part 4 of your request, UKAD confirms that it holds the requested information and discloses it in the annex to this response.
- 7. In relation to Part 5 of your request, UKAD confirms that it holds some of the information requested. However, whilst UKAD discloses some of the information it holds in the annex to this response, parts of the information held are subject to an exemption under the Act and are therefore withheld.
- 8. In relation to Part 6 of your request, UKAD confirms that it holds the information requested and discloses it in the annex to this response.

Part 1 of your request

9. Section 21 of the Act states:

21 Information accessible to applicant by other means.

- (1) Information which is reasonably accessible to the applicant otherwise than under section 1 is exempt information.
- (2) For the purposes of subsection (1)
 - a. information may be reasonably accessible to the applicant even though it is accessible only on payment, and
 - b. information is to be taken to be reasonably accessible to the applicant if it is information which the public authority or any other person is obliged by or under any enactment to communicate (otherwise than by making the information available for inspection) to members of the public on request, whether free of charge or on payment.
- 10. In relation to Part 1 of your request, this information is reasonably accessible to you by other means, as it is freely available on UKAD's website. The requested

information for 2020-2023 can be found here, and the requested information for 2024 can be found here.

Parts 2 and 3 of your request

- 11. UKAD does not hold information relevant to Parts 2 and 3 of your request.
- 12. The 2024 Paris Olympic and Paralympic Games were conducted under the governance of the International Olympic Committee ('IOC'). Since 2019, the IOC has delegated the responsibility for the organisation and management of Doping Control at the Olympic Games to the International Testing Agency ('ITA'). As such, UKAD does not hold any information regarding the number of drug tests carried out, nor the number of 'positive drug tests' at the 2024 Paris Olympic and Paralympic Games.

Part 4 of your request

13. In respect of Part 4 of your request, UKAD confirms that it holds the requested information. The number of tests carried out in men's and women's football, under the jurisdiction of The FA, across the 2020-21 to 2023-24 seasons (inclusive) is detailed in the annex to this response.

Part 5 of your request

- 14. In respect of Part 5 of your request, UKAD confirms that it holds some of the requested information, specifically in relation to the age and gender of Athletes tested. UKAD discloses some of this information, but part of it is not being disclosed because the information is subject to an exemption under the Act, as is more particularised below.
- 15. In respect of an Athlete's ethnicity, Article 7.4.5 of the WADA International Standard for Results Management ('ISRM') stipulates the minimum information to be recorded when a Sample is collected from an Athlete. An Athlete's ethnicity is not included as part of that minimum information and is not otherwise recorded by UKAD. UKAD therefore holds no information relating to the ethnicity of each Athlete tested across the 2020-21 to 2023-24 football seasons (inclusive).
- 16. As to an Athlete's gender, as per Article 7.4.5 of the ISRM, the Athlete's sport gender shall be recorded as part of the minimum information. This is recorded as either 'male' or 'female' and is the gender of the event in which the Athlete competes. UKAD holds information relating to the gender of Athletes tested in men's and women's football, under the jurisdiction of The FA, across the 2020-21

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- to 2023-24 seasons (inclusive). Please find this information in the accompanying annex under sections 5.
- 17. In respect of an Athlete's age at the time of a test, UKAD holds this information and discloses it in the annex at 5(b). Please note that UKAD is withholding the number of Athletes that were either under the age of 18, or over the age of 36 at the time of the test. This information is withheld under the exemption provided for in section 31 of the Act on the grounds that releasing the information would likely prejudice the exercise by UKAD of its regulatory functions.
- 18. Section 31 provides as follows:

Section 31 Law Enforcement

(1) Information which is not exempt by virtue of section 30 is exempt information if its disclosure under the Act would, or would be likely to, prejudice –

. . .

(g) the exercise by any public authority of its functions for any of the purposes identified in subsection (2),

...

(2) The purposes referred to in subsection 1(g) to (i) are –

...

- (b) the purpose of ascertaining whether any person is responsible for any conduct which is improper.
- 19. One of UKAD's core functions is to identify and prosecute any Athlete or other person who commits an ADRV contrary to the UK Anti-Doping Rules ('the Rules'). This function falls within section 31(1)(g) of the Act, as it is exercised for the purpose set out in section 31(2)(b) of the Act. UKAD uses its Testing programme to discover ADRVs.
- 20. UKAD considers section 31 of the Act to be engaged in this context because there are a sufficiently small number of Athletes in the age categories 'under 18' and 'over 36' that if UKAD were to disclose these figures, it could lead to the identification, or misidentification, of individual Athletes.

- 21. In carrying out its regulatory function, UKAD must be in a position to confidentially plan and implement a Testing programme. If UKAD were to disclose the information requested, it would undermine the confidentiality and associated success of UKAD's Testing programme, as it would indicate to athletes of a certain age the likelihood of being tested at any given time. A fundamental principle of drug testing is that it is conducted without advance notice.
- 22. More generally, it would give an insight into UKAD's Testing strategy and may enable testing patterns to be identified, providing assistance to any Athletes who may seek to cheat by attempting to evade testing or avoid the detection of ADRVs.
- 23. Having determined to withhold the information pursuant to section 31 of the Act, UKAD has considered the public interest arguments in favour of releasing the information. UKAD recognises the importance of transparency and accountability in general, and specifically in providing the public with more understanding of its Testing process¹.
- 24. Conversely, UKAD considers that the more important public interest lies in the effective and confidential management of its Testing, investigation and prosecution processes, and compliance with its confidentiality obligations as provided for by the ADR, so that UKAD can work towards its public policy objective of eliminating doping in sport. Disclosing the information requested would undermine the effectiveness of the Testing program as it would be likely to reduce both its deterrent effect and its effectiveness in detecting Prohibited Substances.
- 25. UKAD has concluded that the public interest in disclosing the information requested is outweighed by the public interest in ensuring the effectiveness of its Testing, investigation and prosecution processes, and compliance with its confidentiality obligations. UKAD therefore withholds this information under section 31 of the Act.

Part 6 of your request

26. In respect of Part 6 of your request, UKAD confirms that it holds the requested information. The number of 'positive drug tests' in men's and women's football, under the jurisdiction of The FA, in the 2020-21 to 2023-24 season (inclusive) is as detailed in the annex to this response.

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¹ UKAD does publish a significant amount of Testing information, available here.

Conclusion

- 27. If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of this response and should be addressed via email to foi@ukad.org.uk. Please remember to quote the reference number above in any further communications.
- 28. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely

UK Anti-Doping

W. Anti-Doping

Part 4 - Drug tests carried out in men's and women's football across the 2020-21 to 2023-24 seasons (inclusive)

	2020-21	2021-22	2022-23	2023-24	Total
Total	2,210	2,972	2,934	2,732	10,848

Part 5 - Drug tests carried out in men's and women's football across the 2020-21 to 2023-24 seasons (inclusive), broken down by gender

Sport Gender	2020/21	2021/22	2022/23	2023/24	Total
Female	154	205	287	290	936
Male	2,056	2,767	2,647	2,442	9,912
Total	2,210	2,972	2,934	2,732	10,848

Part 5(b) Drug tests carried out in men's and women's football across 2020-21 to 2023-24 seasons (inclusive), broken down by the age of Athlete at test

Age at test	Season 2020/21	2021/22	2022/23	2023/24	Total
Under 18	Not Disclosed	Not Disclosed	Not Disclosed	Not Disclosed	Not Disclosed
18	36	124	120	132	412
19	58	144	160	130	492
20	97	160	164	164	585
21	99	170	174	150	593
22	137	214	181	204	736
23	191	229	209	174	803
24	210	242	219	242	913
25	190	244	267	184	885
26	179	185	230	241	835
27	205	197	200	188	790
28	168	192	162	138	660
29	183	175	164	144	666
30	125	166	167	131	589
31	109	117	131	102	459
32	70	93	75	80	318
33	63	57	74	60	254
34	35	41	42	40	158
35	31	33	21	22	107
36	10	25	18	16	69
Over 36	Not Disclosed	Not Disclosed	Not Disclosed	Not Disclosed	Not Disclosed
Total	2196	2808	2778	2542	10324

Part 6 - Positive drug tests in football seasons 2020-21 to 2023-24 (inclusive)

	2020-21	2021-22	2022-23	2023-24	Total
Total	2	2	4	2	10