

Issued Decision

UK Anti-Doping and [Athlete J (a Minor)]

Disciplinary Proceedings under the Anti-Doping Rules of Swim England

This is an Issued Decision made by UK Anti-Doping Limited ('UKAD') pursuant to the Anti-Doping Rules ('ADR') of Swim England. It concerns Anti-Doping Rule Violations ('ADRVs') committed by [Athlete J] and records the applicable Consequences.

Capitalised terms used in this Decision shall have the meaning given to them in the ADR unless otherwise indicated.

Background and Facts

1. Swim England is the national governing body for the sport of swimming in England, and a member of Aquatics GB¹, the national governing body for Swimming in Great Britain. UKAD is the National Anti-Doping Organisation for the United Kingdom. Swim England has adopted, as its own ADR, the British Swimming Anti-Doping Rules², which are issued by Aquatics GB and subject to updates made by UK Anti-Doping, as necessary and in accordance with the UK Anti-Doping Rules and World Anti-Doping Code. The ADR apply to all members of Swim England.
2. [Athlete J] is a [Minor] swimmer and boarding pupil at [a school] ('the School'). At all material times, [Athlete J] was a member of Swim England and therefore subject and bound to comply with the ADR. Pursuant to ADR Article 7.2, UKAD has Results Management responsibility in respect of all Athletes that are subject to the jurisdiction of Swim England.
3. On 18 September 2024, [teachers at Athlete J's] boarding house at the School conducted a search of [Athlete J's] bedroom. The following Prohibited Substances were found in [Athlete J's] bedroom in a pair of [Athlete J's] trousers:
 - a) MK-677 (ibutamoren);
 - b) A4 andarine;
 - c) MK-2866 (ostarine); and

¹ Aquatics GB is the trading name of British Swimming, and is responsible internationally for the high performance representation of the sport.

² Version 1.0, in effect as from 1 January 2021

- d) Enclomiphene citrate (together, 'the Prohibited Substances').
4. Ibutamoren is listed at S2.2.4 of the 2024 WADA Prohibited List (the 'Prohibited List') as a growth hormone releasing factor. It is a non-Specified Substance that is prohibited at all times (i.e. In-Competition and Out-of-Competition).
 5. Andarine and ostarine are both listed at S1.2 of the Prohibited List as other anabolic agents. They are both non-Specified Substances that are prohibited at all times.
 6. Enclomiphene citrate is a hormone and metabolic modulator, specifically an anti-estrogenic receptor modulator (SERM). It is a Specified Substance that is prohibited at all times under S4.2 of the Prohibited List.
 7. Following the discovery of the Prohibited Substances, [Athlete J] admitted to [a teacher] that [they] had purchased them.
 8. On 14 November 2024, [Athlete J] participated in an interview with UKAD, where [they] admitted to purchasing and using the Prohibited Substances. [Athlete J] told UKAD that [they] had purchased the Prohibited Substances during the School's summer holiday. [They] confirmed that the Prohibited Substances belonged to [them] and that no other individual had access to the Prohibited Substances. [Athlete J] indicated that [they] had Used the Prohibited Substances [in] September 2024. [They] admitted that [they] had researched the Prohibited Substances, primarily via social media and artificial intelligence, before purchasing them. [Athlete J] stated that [their] research showed that the substances were banned and that taking the substances may have negative health impacts. [They] told UKAD that [they] had used the Prohibited Substances to improve [their] body image (in particular, to gain muscle mass and strength) and not to enhance [their] sport performance. [Athlete J] indicated that [they] had received anti-doping education from UKAD on one occasion.
 9. Following the interview, [Athlete J] provided UKAD with copies of order confirmation emails which showed that [they] had purchased one of the Prohibited Substances (MK-677 (ibutamoren)) on 13 August 2024 and the remainder of the Prohibited Substances on 29 August 2024.
 10. [Athlete J] does not have a Therapeutic Use Exemption ('TUE') for ibutamoren, andarine, ostarine and/or enclomiphene citrate.
 11. On 11 April 2025, UKAD sent [Athlete J] a letter (the 'Notice Letter'). The Notice Letter confirmed the imposition of a Provisional Suspension and formally notified [Athlete J], in accordance with ADR Article 7.8.1, that [they] may have committed ADRVs pursuant to ADR Article 2.2 (Use of a Prohibited Substance) and ADR Article 2.6 (Possession of a Prohibited Substance).
 12. In [their] response to the Notice Letter, [Athlete J] admitted to the ADRVs and acceded to a four (4) year period of Ineligibility. [Athlete J] stated that, at the time of the violations, [they were] in "*a very low psychological state*". [They] stated that [they were] struggling with [their] body image and became increasingly focussed on

training in the gym. [Athlete J] explained that [they] developed unrealistic expectations as to the results [they] should expect from [their] gym training because of *“the physiques of Instagram personalities with unattainable body standards”*. [They] stated that [their] decision to purchase the Prohibited Substances was influenced by Instagram personalities recommending the use of Selective Androgen Receptor Modulators to aid muscle gain. [Athlete J] nevertheless accepted that this was *“no excuse for [[their]] actions”* and stated that [they] took *“full responsibility for [[their]] poor decision to use these substances.”*

13. On 11 June 2025, UKAD proceeded to issue [Athlete J] with a Charge Letter in accordance with ADR Article 7.11.2. The Charge Letter asserted the commission of ADRVs pursuant to ADR Article 2.2 (Use of a Prohibited Substance) and ADR Article 2.6 (Possession of a Prohibited Substance).
14. In the Charge Letter, UKAD asserted a total period of Ineligibility of four (4) years commencing on 11 April 2025 (i.e. the date the Provisional Suspension was imposed by UKAD) and expiring at 11:59pm on 10 April 2029.

Admission and Consequences

15. On 15 June 2025, [Athlete J] responded to the Charge Letter, admitting both ADRVs and accepting the Consequences asserted by UKAD, being a period of Ineligibility of four (4) years, commencing on 11 April 2025.

16. ADR Article 2.2 provides that the following is an ADRV:

2.2 *Use or Attempted Use by an Athlete of a Prohibited Substance or a Prohibited Method, unless the Athlete establishes that the Use or Attempted Use is consistent with a TUE granted in accordance with Article 4.*

17. ADR Article 2.6 provides that the following is an ADRV:

2.6 *Possession of a Prohibited Substance and/or a Prohibited Method by an Athlete or Athlete Support Person*

2.6.1 *Possession by an Athlete In-Competition of a Prohibited Substance or any Prohibited Method, or Possession by an Athlete Out-of-Competition of any Prohibited Substance or any Prohibited Method which is prohibited Out-of-Competition unless the Athlete establishes that the Possession is consistent with a TUE granted in accordance with Article 4 or other acceptable justification.*

18. ADR Article 10.2 provides as follows:

10.2 *Imposition of a Period of Ineligibility for the Presence, Use or Attempted Use, or Possession of a Prohibited Substance and/or a Prohibited Method.*

The period of Ineligibility for an Anti-Doping Rule Violation under Article 2.1, 2.2 or 2.6 that is the Athlete's or other Person's first anti-doping offence shall be as follows, subject to potential elimination, reduction or suspension pursuant to Article 10.5, 10.6 or 10.7:

- 10.2.1 *Save where Article 10.2.4(a) applies, the period of Ineligibility shall be four (4) years where:*
- (a) The Anti-Doping Rule Violation does not involve a Specified Substance or a Specified Method, unless the Athlete or other Person can establish that the Anti-Doping Rule Violation was not intentional.*
 - (b) The Anti-Doping Rule Violation involves a Specified Substance or a Specified Method and UKAD can establish that the Anti-Doping Rule Violation was intentional.*
- 10.2.2 *If Article 10.2.1 does not apply, then (subject to Article 10.2.4(a)) the period of Ineligibility shall be two (2) years.*
- 10.2.3 *As used in Article 10.2, the term "intentional" is meant to identify those Athletes or other Persons who engage in conduct which they know constitutes an Anti-Doping Rule Violation or they know that there is a significant risk that the conduct might constitute or result in an Anti-Doping Rule Violation and they manifestly disregard that risk...*

Non-Specified Substances

19. In accordance with ADR Article 10.2.1(a), the period of Ineligibility imposed in relation to the non-Specified Substances (i.e. MK-677 (ibutamoren), andarine and ostarine) shall be four (4) years, unless [Athlete J] can establish on the balance of probabilities that the ADRVs were not intentional (within the meaning of ADR Article 10.2.3).
20. [Athlete J] has not sought to establish that the ADRVs involving the non-Specified Substances were not intentional within the meaning of ADR Article 10.2.3. Instead, [Athlete J] has admitted to the ADRVs and accepted the asserted period of Ineligibility of four (4) years. Accordingly, [Athlete J] is not entitled to a two (2) year period of Ineligibility pursuant to ADR Article 10.2.2, or any reduction pursuant to ADR Article 10.5 (No Fault or Negligence) or ADR Article 10.6 (No Significant Fault or Negligence) thereafter.

Specified Substance

21. In accordance with ADR Article 10.2.1(b), the period of Ineligibility imposed in relation to the Specified Substance (enclomiphene citrate) shall be two (2) years,

unless UKAD can establish, to the requisite standard of proof,³ that the ADRVs were intentional (within the meaning of ADR Article 10.2.3).

22. In [their] interview with UKAD, [Athlete J] admitted that, at the time of purchasing, possessing and using the Prohibited Substances, [they] knew that the Prohibited Substances were banned and “*against the rules*”.
23. UKAD therefore asserted that the ADRVs involving the Specified Substance were intentional (within the meaning of ADR Article 10.2.3) and asserted a period of Ineligibility of four (4) years. In [their] responses to the Notice Letter and Charge Letter, [Athlete J] admitted the totality of the ADRVs and accepted the Consequences asserted by UKAD.
24. Accordingly, [Athlete J] accepts a four (4) year period of Ineligibility in respect of the ADRVs concerning a Specified Substance, in accordance with ADR Article 10.2.1(b).

Application of ADR Article 10.9.4

25. For the purposes of imposing a sanction, the ADRVs will be considered together as a single first violation, pursuant to ADR Article 10.9.4 which states as follows:

10.9.4 Additional rules for certain potential multiple offences:

- (a) *For the purposes of imposing sanctions under Article 10.9, except as provided in Articles 10.9.4(b) and 10.9.4(c) an Anti-Doping Rule Violation will only be considered a second (or third, as applicable) Anti-Doping Rule Violation if UKAD can establish that the Athlete or other Person committed the additional Anti-Doping Rule Violation after they received notice, or after UKAD or its designee made a reasonable attempt to give notice, of the first (or second, as applicable) Anti-Doping Rule Violation. Otherwise, the first and second Anti-Doping Rule Violations (or the second and third Anti-Doping Rule Violations, as applicable) shall be considered as one single first Anti-Doping Rule Violation, and the sanction imposed shall be based on the Anti-Doping Rule Violation that carries the more severe sanction, including the application of Aggravating Circumstances. Results in all Competitions dating back to the earlier Anti-Doping Rule Violation will be Disqualified as provided in Article 10.10.*

³ ADR Article 8.4.1 states:

UKAD will have the burden of establishing that the Athlete or other Person has committed the Anti-Doping Rule Violation(s) charged. To meet that burden, UKAD must establish the Athlete's or other Person's commission of the Anti-Doping Rule Violation(s) to the comfortable satisfaction of the hearing panel, bearing in mind the seriousness of the allegations that are made. This standard of proof in all cases is greater than a mere balance of probability but less than proof beyond reasonable doubt.

Application of ADR Article 10.8.1

26. ADR Article 10.8.1 stipulates:

10.8.1 *One (1) year reduction for certain Anti-Doping Rule Violations based on early admission and acceptance of sanction:*

Where UKAD sends an Athlete or other Person a Charge Letter for an Anti-Doping Rule Violation that carries an asserted period of Ineligibility of four (4) or more years (including any period of Ineligibility asserted under Article 10.4), if the Athlete or other Person admits the violation and accepts the asserted period of Ineligibility no later than twenty (20) days after receiving the Charge Letter, they shall receive a one (1) year reduction in the period of Ineligibility asserted by UKAD. Where the Athlete or other Person receives the one (1) year reduction in the asserted period of Ineligibility under this Article 10.8.1, no further reduction in the asserted period of Ineligibility shall be allowed under any other Article.

27. [Athlete J] admitted both ADRVs and accepted the asserted period of Ineligibility of four (4) years within twenty (20) days of receiving the Charge Letter. Therefore, ADR Article 10.8.1 applies and [Athlete J] shall receive a one (1) year reduction to the four (4) year period of Ineligibility, meaning that after the applicable reduction, a three (3) year period of Ineligibility is imposed.

Commencement of period of Ineligibility

28. ADR Article 10.13 requires that the period of Ineligibility starts on the date Ineligibility is accepted or otherwise imposed where there is no hearing.
29. However, ADR Article 10.13.2 allows for credit to be given against the total period of Ineligibility to be served where an Athlete has been provisionally suspended and has respected the terms of that Provisional Suspension.
30. [Athlete J] has been subject to a Provisional Suspension since the date [they] received the Notice Letter, i.e., since 11 April 2025 and, as far as UKAD is aware, [they have] respected the terms of that Provisional Suspension. Therefore, affording [Athlete J] credit for the time [they have] spent provisionally suspended, [their] period of Ineligibility is deemed to have commenced on 11 April 2025 and will end at 11:59pm on 10 April 2028.

Status during Ineligibility

31. During the period of Ineligibility, in accordance with ADR Article 10.14.1, [Athlete J] shall not be permitted to participate in any capacity (or assist any Athlete participating in any capacity) in a Competition, Event or other activity (other than authorised anti-doping education or rehabilitation programmes) organised, convened, authorised or recognised by:
- a) Swim England;

- b) Any Signatory;
 - c) Any club or other body that is a member of, or affiliated to, or licensed by, a Signatory or a Signatory's member organisation;
 - d) Any professional league or any international or national-level Event organisation; or
 - e) Any elite or national-level sporting activity funded by a governmental agency.
32. [Athlete J] may return to train with a team or to use the facilities of a Swim England club or a Signatory's member organisation during the last two months of [their] period of Ineligibility (i.e. from 11:59pm on 10 February 2028) pursuant to ADR Article 10.14.4(b).

Publication of this Decision

33. ADR Article 8.5.1 provides:

Where the hearing panel determines that an Anti-Doping Rule Violation has been committed, the decision may be Publicly Reported immediately. If the decision is not appealed, or is upheld on appeal, the decision (if not previously Publicly Reported) shall be Publicly Reported within twenty (20) days of the expiry of the appeal deadline or the appeal decision (as applicable). However, this mandatory Public Reporting requirement shall not apply where the Athlete or other Person who has been found to have committed an Anti-Doping Rule Violation is a Protected Person, Minor or a Recreational Athlete. Any optional Public Reporting in a case involving a Protected Person, Minor or a Recreational Athlete shall be proportionate to the facts and circumstances of the case.

34. A Minor is defined in the ADR as "[a] natural person under the age of 18". [Athlete J] is [under the age of 18] and therefore a Minor within the meaning of the ADR.

35. A Protected Person is defined in the ADR as:

An Athlete or other natural Person who at the time of the Anti-Doping Rule Violation: (i) has not reached the age of sixteen (16) years; or (ii) has not reached the age of eighteen (18) years and is not included in any Registered Testing Pool and has never competed in any International Event in an open category; or (iii) for reasons other than age has been determined to lack legal capacity under applicable national law.

36. At the time of the ADRVs, [Athlete J] had not yet reached the age of eighteen (18) years, was not included in any Registered Testing Pool and had never competed in any International Event in an open category. [They] therefore [are] also a Protected Person within the meaning of the ADR.

37. UKAD has determined that any public reporting of this Decision should take place on an anonymised basis⁴. Such Public Disclosure is proportionate to the facts and circumstances of this case, having particular regard to:

- a) The purposes of the ADR;
- b) The seriousness of the ADRVs;
- c) [Athlete J's] age;
- d) [Athlete J's] status as both a Minor and Protected Person;
- e) [Athlete J's] present and future mental wellbeing; and
- f) The personal circumstances of [Athlete J] surrounding the ADRVs.

Summary

38. For the reasons given above, UKAD has issued this Decision in accordance with ADR Article 7.12.2, and records that:

- a) [Athlete J] has committed ADRVs pursuant to ADR Article 2.2 and ADR Article 2.6;
- b) In accordance with ADR Article 10.9.4(a), the ADRVs are considered as one single ADRV for the purposes of imposing a sanction;
- c) [Athlete J] is entitled to a one (1) year reduction to the asserted period of Ineligibility of four (4) years. A three (3) year period of Ineligibility is therefore imposed;
- d) Acknowledging [Athlete J's] Provisional Suspension, the period of Ineligibility is deemed to have commenced on 11 April 2025 and will expire at 11:59pm on 10 April 2028; and
- e) [Athlete J's] status during the period of Ineligibility shall be as detailed in ADR Article 10.14.

39. [Athlete J], Swim England, World Aquatics and WADA have a right to appeal against this Decision or any part of it in accordance with ADR Article 13.4.

40. Any Public Disclosure of this Decision will be done on an anonymised basis and via UKAD's website in accordance with ADR Article 8.5.3.

19 August 2025

⁴ For this reason, the non-anonymised version of this Decision is not to be publicly disclosed. Any amendment made by reason of anonymisation to this version of the Decision, is signified through the use of square brackets.