



# DATA PROTECTION PROTOCOL FOR ATHLETES ON THE WORLD CLASS PROGRAMME

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# A. Role of UK Sport

The United Kingdom Sports Council ("**UK Sport**") is responsible for investment into the high performance system at both a strategic and operational perspective. One of UK Sport's primary elite sport activities is to invest into a programme designed and operated to systematically nurture and sustain Athletes capable of succeeding at the highest level of international competition (the "**World Class Programme**" or "**WCP**").

UK Sport has a number of important roles as the UK national agency for high performance sport funded by the UK Government and the National Lottery:-

## 1. Core Functions

- 1. It leads on the on-going evolution of a sustainable and efficient high performance system.
- 2. It ensures that the resources available to support the most talented and successful Athletes are sufficient to maximise their changes of medal success at the Olympic and Paralympic Games.
- 3. It works in partnership with the Home Country Sports Institutes ("**HCSI**") to help shape underpinning performance foundations investment, to ensure the World Class Programme investment is built on a system of support for athletes and sports as they enter the World Class performance pathway.
- 4. It directly funds individual Athletes on the World Class Programme for sporting and living costs ("Athlete Performance Awards"). It sets investment principles which describe and guide its investment approach into the high performance system.
- 5. It makes investment decisions into Athletes and sports capable of winning medals in the Olympic and Paralympic Games. It monitors, manages and reviews the progress of all National Governing Bodies ("NGBs"), Athletes and World Class Programmes.
- 6. It makes investments into partner organisations such as The English Institute of Sport Limited ("EIS"), Home Country Sports Institutes, the British Olympic and Paralympic Associations.

Whilst this Protocol has been written with Athletes on the WCP in mind it does seek to cover talent identification stage of an Athletes' journey on the performance pathway. The Protocol is also focussed on an Athlete on the WCP who utilises the services of EIS and UK Sport's working relationship with EIS. However, there are Athletes on the WCP who receive support services from their applicable HCSIs (who have access to PDMS) and not EIS and whilst this Protocol does not cover that relationship, readers can apply the principles and processes set out in this Protocol on the basis that they are

substantially similar. This Protocol will be reviewed each year to ensure it is up to date and fit for purpose.

# 2. Support Services

## **Strategic Support Services**

UK Sport runs a number of centralised strategic support services to the WCP including:

- 1. Development Programmes for World Class Coaches
- 2. Performance Pathways (Performance Foundation / Talent Identification)
- 3. Sports Intelligence
- 4. Athlete Medical Scheme

## **Specialist Support Services**

In all aspects of its work, UK Sport works closely with National Governing Bodies and the Home Country Sports Institutes to deliver expertise and quality services to World Class Programmes and their Athletes. The most significant partner and sports institute investment is into EIS.

The range of services provided by EIS (or where applicable HCSIs) are as follows:

- 1. Performance Management
- 2. Performance Coaching
- Performance Science
- 4. Performance Analysis
- 5. Performance Psychology
- Performance Nutrition
- 7. Performance Pathways (Performance Foundation / Talent Identification)
- 8. Performance Lifestyle
- 9. Sports Science
- 10. Sports Medicine
- 11. Strength & Performance Conditioning
- 12. Physiotherapy and Soft Tissue Therapy
- 13. Physiology
- 14. Biomechanics
- Performance Innovation

#### 3. Investment Decisions

UK Sport's investment principles and underpinning policies describe and guide its investment approach which are set out in its investment guide for the relevant Olympic and Paralympic cycle. The investment principles have been agreed and approved by the UK Sport Board and are outcome based.

# 4. A Relationship of Trust

In order to fulfil its objectives, UK Sport and EIS must work with a number of parties. UK Sport, EIS, HCSIs, NGBs, British Olympic and Paralympic Associations, performance teams and Commercial Partners share Athlete data for a number of purposes (as described in Section B (*Performance Teams and Commercial Partners*) of this Protocol). Sharing of Athlete data is done with the aim of improving the high performance system, maximising Athlete performance and securing medals for Team GB and Paralympics GB.

UK Sport and EIS are committed to ensuring a relationship of utmost trust with its Athletes and works with the NGBs, HCSIs and commercial partners to ensure that all members of the high performance system handle Athlete data fairly and lawfully. The key principles governing the use and sharing of Athlete data within the high performance system are described in Section D (*Complying with the law*) of this Protocol. UK Sport, EIS, HCSIs, their commercial partners and performance teams strive to comply with applicable laws, including data protection laws, and professional codes of practice in using and sharing Athlete data. Without limiting their obligations under such laws and professional codes of practice, key principles governing how UK Sport and its partners use and share Athlete data are as follows:

- Transparency and consent: Athletes are informed of how their data will be used, by which parties, and for what purposes. Wherever appropriate and required by law, Athletes will be given the opportunity to consent to that usage.
- Security: Athlete data needs to be held securely and accessible only by relevant Performance Teams and Commercial Partners, as further detailed in Section B (Performance Teams and Commercial Partners) below.
- Data minimisation: Athlete data is useful for a number of purposes, but these
  need to be clearly specified in advance, and only that data which is needed to
  fulfil the purpose is collected and used.

# **B. Performance Teams and Commercial Partners**

## 1. Performance Teams

## a) High Performance Teams

The world of high performance sport involves a wide range of different parties often working collaboratively in an inter-disciplinary environment to provide expert services and solutions for all Athletes on the WCP. Athlete data and confidential performance information needs to be shared between inter-disciplinary teams within UK Sport, NGBs, EIS, HCSIs, the British Olympic and Paralympic Associations and with Commercial Partners to ensure each WCP can deliver Athletes that can win medals for Team GB and Paralympics GB .

UK Sport requires Athlete data to perform its Core Functions, to make Investment Decisions, provide Strategic Support Services and pay Athlete Performance Awards.

Each NGB requires Athlete data in order to perform multiple functions; it is the member of the international federation for its sport, the body with jurisdiction over Athletes participating in its sport and the body responsible for identifying, supporting, developing, selecting and obtaining accreditations for Athletes to represent the British Team at international competitions, events, world cups and Olympic or Paralympic Games. In addition, the NGB delivers the WCP and receives investment from UK Sport to do so, it commissions Specialist Support Services to Athletes, organises national competitions and liaises with its members.

EIS and HCSIs require Athlete data because they are service providers of Specialist Support Services and employ or contract with people who form part of an Inter-disciplinary Support Team. In addition EIS use Athlete data for the benefit of the high performance system and to improve, share best practice and knowledge across all sports. EIS also shares Athlete data to advance knowledge in sports science and sports medicine by working in collaboration with academic institutions and their students on research projects and for the purposes of continuing professional development.

The British Olympic and Paralympic Associations will require Athlete data because they are responsible for all matters relating to the Athlete when they are a member of Team GB or Paralympics GB at the Olympic or Paralympic Games. This is to ensure Athletes are best prepared for the Games. They cover a range of benefits from administration services for entry, accreditation to and participation in the Games, provision of team kit, travel to and from the Games, access to preparation and training facilities (including rest and relaxation), accommodation, access to venues, specialist advice (including performance and medical), treatment from team medical officers and management of media requests.

UK Sport and EIS have set up protocols and systems to ensure that all Athlete data is treated in accordance with the key principles of transparency, consent, security and data minimisation and that there is monitoring and auditing of compliance with such

protocols and systems. The basis on which these protocols have been agreed is rooted in laws and/or professional codes of practice.

# b) Individual stakeholders

The various stakeholders involved, parties employed or contracted within a high performance system have been categorised under the following headings:-

- Athlete means athletes who are;
  - identified and confirmed through a talent identification programme and are at performance foundation level in an NGB who receive support and assistance from Performance Pathways; and/or
  - nominated and selected by NGBs onto the WCP and receive support and assistance from the Inter-disciplinary Support Team; and/or
  - serviced by EIS or an HCSI; and/or
  - not on a recognised pathway of an NGB but are enrolled on the Athlete Medical Scheme.
- Inter-disciplinary Support Team —means members of the Athlete's team or Athlete's support staff consisting of Medical and Scientific Support Staff and Performance Management Staff. It is important to highlight that the Inter-disciplinary Team is made up of staff from NGBs, EIS, HCSIs, UK Sport and in some instances non-staff. It is therefore anticipated that this Protocol will apply to all stakeholders including all permitted contract service providers, the Athlete's personal coaches and other permitted individuals involved in the medical care and support of the Athlete.
- Medical and Scientific Support Staff means members of the Athlete's team,
   Athlete's support staff, Athlete Medical Scheme staff and BUPA staff (including staff
   from relevant onward referrals) who are bound by professional codes of conduct
   with regard to confidentiality including:-
  - Sports Doctors
  - Physiotherapists
  - Clinical, Exercise and Sports Psychologists
  - Podiatrists
  - Osteopaths
  - Chiropractors
  - Counsellors
  - Performance Nutritionists
  - Performance Lifestyle practitioners
  - Skill Acquisition practitioners
  - Strength and Conditioning practitioners
  - Massage Therapists
  - Performance Scientists
  - Sports Science Technicians

Please note that this is not an exhaustive list and therefore other support staff could fall within this category.

- Performance Management Staff means members of the Athlete's team or Athlete's support staff who are <u>not</u> bound by professional codes of conduct with regard to confidentiality including:-
  - Coach
  - Manager
  - Performance Directors and Advisors, EIS Performance Analysts,
     Performance Pathways team and High Performance Manager
  - Institute Network Manager
  - Athlete Investment Officers
  - Sports Intelligence Analysts

Please note that this is not an exhaustive list and therefore other support staff could fall within this category.

# 2. Performance Partnerships

High performance sport in the UK relies on close operational and strategic partnerships between a number of parties. UK Sport and EIS partner with the following parties:-

- National Governing Bodies
- International Sports Federations and Organisations
- British Olympic Association
- British Paralympic Association
- Home Country Sport Institutes
- Universities & Further Education
- British Athletes Commission

## 3. Commercial Partnerships

UK Sport and EIS partner with various private sector organisations that provide Support Services to the WCP. These Commercial Partners are listed on <a href="www.uksport.gov.uk">www.uksport.gov.uk</a> and <a href="www.uksport.gov.uk">www.uksport.gov.uk</a>

UK Sport and EIS are committed to the principles of transparency, consent, security, data minimisation and only transfer data where necessary to achieve a benefit for the Athletes. UK Sport and EIS will also ensure there are mechanisms to monitor and audit partners' compliance with this protocol and Data Protection Laws.

Of UK Sport's and EIS' commercial partners:

- BAE may require access to Athlete data from time to time when providing engineering support to NGBs or an individual Athlete;
- BUPA may require access to Athlete data to be able to provide medical services and treatments to Athletes;
- CGI may require access to Athlete data from time to time in order to provide infrastructure systems integration services to the UK Sport's Sports Intelligence Team;

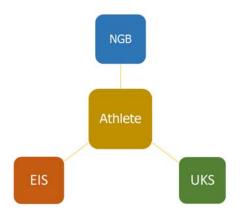
- Nissan may require access to Athlete data from time to time when providing engineering support to NGBs or an individual Athlete; and
- Contractors engaged by the EIS Performance Innovation Team may require access to Athlete data in specific R&I projects over the Olympic and Paralympic cycle.

# 4. Suppliers

In order for UK Sport and EIS to perform their functions as described in this Protocol, a number of service providers are contracted to support various functions where the expertise cannot be sourced internally; these suppliers require access to Athlete data in certain circumstances to perform their roles. UK Sport and EIS ensure that all suppliers act strictly in accordance with specific instructions and are monitored and audited on a regular basis. For example EIS are supported by key suppliers which may also have access to Athlete data by the nature of the work they perform e.g. Rocketmakers (the current developers of PDMS) have access to Athlete data through development activity; migrating one system to another; information technology suppliers or internal auditors. Any services provided by third parties will include contractual obligations to ensure privacy and confidentiality, and access to PDMS will be shut and any data held will be destroyed once the project has been completed. Personal data will then only be held in accordance with the retention periods set out in Section D 5 below.

# C. Contractual Arrangements, Consents and Policies

The significant investment in the WCP and EIS services demands a sophisticated network of professional processes and systems that maximise the return on investment by minimising the risk and above all safeguarding and protecting Athletes and the WCP. These processes and systems are underpinned by contractual arrangements, consents and policies agreed between the stakeholders and performance teams discussed above. Consents are also obtained by Athletes where appropriate to support the sharing of Athlete data. Athlete data lies at the heart of the WCP and high performance system and each Athlete shares its data with UK Sport, EIS and NGBs, as depicted below. The data flows within the WCP and high performance system are further detailed in Section F (*Data Life Cycle*).



The current contracts, consents and policies underpinning these relationships are as follows:

- This Data Protection Protocol
- Athlete Data Protection Consent and Fair Processing Notice (between the Athlete and UK Sport)
- Athlete Data Consent and associated PDMS guidance note (between the Athlete and EIS)
- PDMS Acceptable Use Policy and Data Protection Notice (between user of the EIS's PDMS system and EIS)
- Athlete Performance Award (between the Athlete and UK Sport)
- Athlete Performance Agreement (between the Athlete and the NGB)
- NGB Funding Agreement (between the NGB and UK Sport)
- NGB Services Agreement (between the EIS and NGB)
- BOA/BPA Team Members Agreement
- Supplier Contracts (between Supplier and UK Sport/ EIS) note that such suppliers will only have limited access to Athlete data where necessary in the course of providing relevant services.

# D. Complying with the law

## 1. Data Protection Laws

UK Sport and EIS abide by applicable data protection laws. The principal legal instrument is the Data Protection Act 1998. UK Sport and EIS are committed to complying with the incoming EU General Data Protection Regulation 2018 (or any equivalent implemented in the UK in the event of a departure from the EU) when the same comes into force ("Data Protection Laws"). Staff who need to understand UK Sport's obligations under Data Protection Laws, including administrative support staff, are regularly trained and are aware of their responsibility in relation to personal and sensitive personal data.

Data Protection Laws require that certain data protection principles are followed in the handling of personal data. These principles are that personal data must:

- be fairly, lawfully and transparently processed;
- be processed for limited explicit purposes and not in any manner incompatible with those purposes;
- be adequate, relevant and necessary;
- be accurate and, where necessary, kept up to date;
- not be kept for longer than is necessary;
- be processed in accordance with individuals' rights;
- be secure; and
- not be transferred to countries outside of the European Economic Area without adequate protection.

The policies and procedures adopted by UK Sport and EIS endeavour to ensure that these data protection principles are adhered to.

The Data Protection Laws apply to NGBs and it is a principle under the "UK Sports Governance Code" that NGBs must comply with all Data Protection Laws. UK Sport and EIS expect each NGB to understand its obligations under Data Protections Laws and ensure it has appropriate policies and procedures in respect of these obligations.

## 2. Data Collection

In order to function effectively, UK Sport and EIS collect a range of personal data and sensitive personal data but only where relevant and proportionate to providing Core Functions and Support Services. UK Sport and EIS will not process personal data which is irrelevant or unnecessary in the context of the Core Functions and Support Services referred to above.

#### What is personal data?

Personal data is any information relating to an Athlete who can be identified directly or indirectly from the information. This includes reference to identifiers such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. Details of different categories of personal data processed are set out in Section G of this Protocol.

## What is sensitive personal data?

Sensitive personal data is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Details of different categories of sensitive personal data processed are set out in Section G of this Protocol.

#### Where is data stored?

Personal data on existing and former Athletes and staff is held securely on a variety of UK Sport and EIS computer systems and in structured manual filing systems. The Athlete data held on computer systems are hosted on encrypted servers located within Europe and are backed up daily and duplicated again on encrypted servers located within Europe. The main systems that UK Sport uses are the:

- Grant Management System to manage Athletes on the WCP and, if applicable, their Athlete Performance Awards
- Sports Intelligence Athlete Data Warehouse (a series of different databases which are listed in this section and from which data is copied and added to commercially available athlete results data supplied by licensed third parties (currently Gracenote)) – for the purposes of analysing Athlete performances
- Athlete Medical Scheme Database for the purposes of claims handling
- AthleteZone SharePoint creates Athlete profiles on 'Athlete Zone', the online portal which Athletes can access information about their Athlete Performance Awards and WCP generally.

EIS has developed the Performance Data Management System ("PDMS") to provide NGBs with an online database to hold Athlete data. PDMS is accessible to NGBs, Coaches, Athletes, EIS, HCSIs, BOA and BPA and data is inputted by all parties, either online or via mobile apps. The data held on PDMS includes medical records which are accessible only to medical practitioners at EIS, NGB, BOA, BPA, HCSIs. Access to medical records is secured by two factor authentication. Medical records are held more securely as a higher standard of data protection applies. The Athlete medical data stored on the Athlete Medical Scheme and PDMS databases have additional layers of security to meet these higher standards of data protection.

EIS also holds video capture of Athletes for performance analysis and CPD purposes on Dartfish software. The data can only be accessed by authorised users who have received secure log in details.

## 3. Consent

UK Sport and EIS process many categories of personal data; some of this processing requires the consent of the Athlete. If this information is sensitive personal data, Data Protection Laws require that explicit consent is sought, that extra care is taken to keep this information safe and that it only be used for very clear and restricted purposes. All Athletes are fully informed at their induction of the intended scenarios for processing his or her personal sensitive data. Explicit consent will be achieved through asking all Athletes to sign the relevant Athlete consent form, or where the Athlete is under the age of 16 (or for some sports under 18), an adult at risk or lacks legal capacity to make decisions for themselves then the parent, carer or legal guardian of the Athlete will be asked to attend the Athlete's induction and provide explicit consent on behalf of the Athlete. In medical emergency situations it may not be appropriate to obtain consent in accordance with the process below, in such a situation consent around a specific data type is likely and obtained directly with the Athlete (or their parent, carer or legal guardian) on a case by case basis, as required.

# a) Process of obtaining consent

## 1. Initial contact:

 Athletes may come into contact with an NGB through a Talent Identification Programme. If this is the case, the Athlete will consent to the use of their data through the initial sign up form. The Athlete will also provide data on an assessment day form and a health questionnaire at a subsequent assessment day with the NGB. Alternatively, an Athlete may make direct contact with an NGB whereby they will follow the induction process set out below.

## 2. Induction:

 At their induction, Athletes must be supplied with a data protection and privacy notice by the NGB and be given the opportunity to consider an Athlete Consent Form. Any consent should be freely given and the awarding of a grant should not be conditional on obtaining an Athlete's consent. Athletes should be fully informed and be aware of each party their personal data will be shared with and the purposes of such data sharing.

## Performance Management staff:

- Performance Management staff (who may also support the provision of care i.e. a coach or another Athlete) may not be covered by professional codes of conduct, however their involvement in discussion with medical and scientific staff also requires the explicit consent of the Athlete. Such consent should be obtained in accordance with the Data Protection Laws.
- All parties will respect the medical and scientific professional codes of conduct. If by chance, any ambiguity arises with regard to professional

obligations and performance practice, additional guidance will be sought from the relevant professional body.

 In order to ensure breaches of confidentiality are avoided staff must comply with their organisations data protection and information security policies and procedures. As part of their induction, all staff should be trained in Data Protection Laws.

## 4. Objection:

- UK Sport and EIS will respect the wishes of any Athlete who objects to their personal data being shared with the Performance Management Team. The implications of the objection will be explained to the Athlete to ensure they are fully informed.
- If an Athlete objects to the disclosure of his or her information, and the member of the Medical and Scientific Support Staff consider this to be essential to the provision of care, the Athlete must be informed that it may be difficult to provide treatment and or care without that information being disclosed to other parties.

# 4. Athlete rights

As noted above, in accordance with the Data Protection Laws, UK Sport and EIS have a number of obligations in relation to how it handles Athlete personal data. UK Sport and EIS are committed to their key principles of transparency, consent, security and data minimisation. Alongside relying on UK Sport and EIS meeting their obligations, Athletes have a number of rights that they are entitled to exercise. UK Sport and EIS are committed to protecting these rights and train all staff (including administrative support staff) appropriately so that they can appropriately respond when an Athlete exercises his or her rights.

- Right to information: UK Sport and EIS must provide information about the collection and processing of Athlete data. It does this through the data protection notices given to the Athletes at the outset of their relationship with UK Sport/the NGB.
- Right of access: In accordance with the provisions of the Data Protection Laws, Athletes have certain rights to request a copy of their own personal data held by UK Sport and EIS.
- Right to prevent processing: Athletes have the right to object to processing
  which they think might cause them substantial damage or distress which is
  unwarranted or any processing for the purposes of profiling or direct marketing.
- Right to rectification/erasure/restriction: Athletes have the right to contact UK Sport or EIS to correct errors in personal data held, or delete unnecessary personal data processed by UK Sport or EIS. They also have the right to restrict

processing in certain circumstances. If these rights are exercised then UK Sport or EIS has an obligation to inform third parties it has disclosed to, that the Athlete has exercised the right of rectification, erasure or restriction.

- Right to data portability: This permits the Athlete to receive from UK Sport or EIS a copy of his or her personal data in a commonly used machine-readable format, and to transfer their personal data from UK Sport or EIS to another data controller or have the data transmitted directly between two data controllers.
- Automatic processing: Athletes have the right not to be subject to decisions based solely on automated processing which significantly affect them.

## 5. Retention

The records of UK Sport and EIS form its corporate memory and a record of its activities and achievements. However, this does not mean that all records can or should be retained indefinitely. UK Sport and EIS comply with their obligations under the Data Protection Laws (in particular, the obligation not to retain personal data for longer than is necessary and ensuring there are compelling reasons and justification for retaining sensitive personal data). Personal data will only be retained where it is relevant to fulfilling the Core Functions and/or Support Services or where otherwise required by law or regulations. Different retention times are applied to different data categories to take into account the activity for which the personal data is originally being processed. Once the personal data has served its purpose is shall be deleted, destroyed or anonymised as identified in Appendix 3. UK Sport and EIS have data retention policies which details retention periods for different categories of records and is reviewed annually.

Readers are referred to Section F which sets out the categories of data that are being retained for the relevant periods and Section G for definitions of the data categories.

The retention periods are set out at Appendix 3.

The exceptions to the retention periods are where Athlete data (i) is passed to any HCSI which will be retained by the HCSI in accordance with the HSCI's retention policy (ii) is passed to EIS's insurer which shall be retained by the insurer until settlement of any claim or potential claim; (iii) is passed to the BOA or BPA prior to an Olympic or Paralympic Games and shall be retained by BOA and BPA under their respective retention policies.

# **E.** Athlete Journey

The flowcharts below depict the journey an Athlete may take as he or she progresses through different stages of the high performance system. You can double click on the picture below to open a pdf version of the flowchart. Section F (*Data Life Cycle*) details the data flows that underpin this journey.

## **Talent Identification**



## Nomination for and on the WCP - UKS

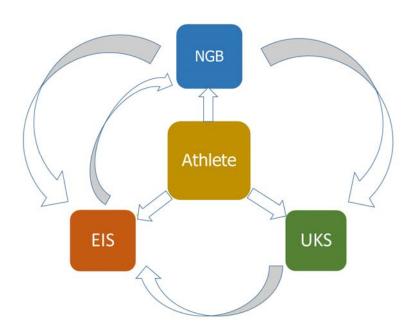


# On the WCP - EIS



# F. Data Life Cycle<sup>1</sup>

In order to maximise the chance of an Athlete's medal success at the Olympic and Paralympic Games a number of parties share Athlete data. This is detailed in each data privacy notice supplied to Athletes and the flow of information is summarised as follows:



#### What is the flow of Athlete data?

The data flows can be categorised into three major flows as follows:

## 1. DATA COLLECTION: ATHLETE -> NGB / TALENT ID PROGRAMME

# 1.1 Athlete supplies data to NGB

The Athlete is initially engaged with the high performance system. In doing so he or she supplies personal data which the NGB holds and shares with other parties. Further data may be supplied if the Athlete is enrolled on the Performance Foundations Programme or the WCP. If the Athlete is engaged through a formal Talent Identification programme the data will be shared between the NGB, UK Sport and the EIS under their collaboration agreement.

Categories of data collected: Athlete biographical data, Athlete identity proofing and verification data and Athlete contact details.

# 1.2 Talent identification programme supplies data to UK Sport, NGB and EIS

<sup>&</sup>lt;sup>1</sup> The lifecycle may be different for athletes on the WCP but who receive support from a HCSI and not EIS.

Certain Athletes come through talent identification programmes. These programmes share the data they collect with UK Sport, NGB and EIS

Categories of data collected and shared: Athlete biographical data, Athlete identity proofing and verification data, Athlete contact details and Athlete talent identification data.

# 2. FUNDING: NGB -> UK SPORT/ ATHLETE -> UK SPORT/ NGB -> EIS

# 2.1 NGB supplies Athlete data to UK Sport

The NGB shares data of Athletes either for the purposes of enrolling such Athletes on the Athlete Medical Scheme (this is irrespective of where the athlete is on the performance pathway) or for nominating the Athlete onto the World Class Programme.

Categories of data supplied: Athlete genealogical data, Athlete identity proofing and verification data, and Athlete contact details.

## 2.2 Athlete supplies data to UK Sport

If the Athlete makes an Athlete Performance Award application he or she will provide additional data directly to UK Sport.

Categories of data supplied: Athlete biographical data, Athlete identity proofing and verification data, Athlete personal financial data and Athlete contact details.

# 2.3 UK Sport processes Athlete data

## 2.3.1 UK Sport then processes this data in order to:

- (a) assess Athlete Performance Award applications and, if successful, make payments of the award to the Athlete;
- (b) enrol the Athlete on the Athlete Medical Scheme via the BOA and onwards to BUPA;
- (c) share Athlete data with various government bodies to prevent and detect misuse of the Athlete Performance Award (e.g. HMRC, DWP or the police);
- (d) share Athlete data with Athletes' Home Country Institute for Sport (e.g. English Institute for Sport) to notify them of Athletes' APA Awards;
- share personal data with the British Athlete's Commission and Sports Aid (in which case is a list of Athlete names only) for membership purposes;

- (f) share personal data with UK Anti-Doping or other anti-doping organisations or the gambling commission authorities; or
- (g) use Athlete's profile in media and publications.
- 2.3.2 UK Sport also receives competition result data from Gracenote (a supplier of international competition and event results data) which feeds into its existing Athlete Data records. The Sports Intelligence team at UK Sport/EIS provide Athlete names and Date of Birth only from its Grant Management System to Gracenote to link to the Athlete's individual performance results. The service offered by Gracenote may also be used by NGBs, EIS and HCSI.

Categories of data processed: Athlete biographical data, Athlete identity proofing and verification data, Athlete personal financial data, Athlete contact details, Athlete official competition data and Athlete WCP programme affiliation data.

# 2.4 NGB supplies personal data to EIS/Home Country Sports Institutes

NGB contracts out sport science, medicine and talent services to EIS or HCSIs. In order to perform this function the NGB transfers Athlete data for the purposes of induction/nomination by EIS.

Categories of data shared: Athlete identity proofing and verification data and Athlete contact details.

## 3. RESEARCH: EIS -> NGB / EIS -> THIRD PARTIES

# 3.1 EIS generates reports for NGB

EIS provide NGBs with analysis and reporting services (e.g. performance analysis reports and data (including video footage which would be provided via Dartfish TV)) to assist with training monitoring and evaluation.

Categories of data shared: Athlete biographical data, Athlete health / medical data, Athlete Talent Identification Data, Athlete Official Competition Performance Data, Athlete Training Monitoring and Evaluation Data, Athlete Support Team Generated Competition Performance Data.

## 3.2 EIS independently processes Athlete data

EIS may process Athlete data outside of the PDMS system and this data may not be shared with the NGB on the request of the Athlete or in accordance with professional codes of confidentiality. This will be explained to the Athlete at induction meetings as noted above and would include Performance Lifestyle services and Psychology services.

EIS may process Athlete data for the purpose of providing Performance Innovation services with the aim of ultimately providing technology which will enhance the Athlete's performance.

EIS may also conduct and/or commission with higher education establishments involving the Athlete data. Steps will be taken to anonymise the data prior to conducting the research, but where this is not possible the consent of the Athlete would be sought.

## Categories of data processed:

Athlete biographical data, Athlete health / medical data, Athlete Talent Identification Data, Athlete Official Competition Performance Data, Athlete Training Monitoring and Evaluation Data, Athlete Support Team Generated Competition Performance Data.

# 3.3 EIS shares Athlete data with third parties

EIS will also share Athlete data with various relevant third parties including HCSI, insurers, Commercial Partners, research bodies (higher education establishments), suppliers and EIS related platforms.

# Categories of data shared:

Athlete biographical data, Athlete health / medical data, Athlete Talent Identification Data, Athlete Official Competition Performance Data, Athlete Training Monitoring and Evaluation Data, Athlete Support Team Generated Competition Performance Data.

# 3.4 Performance Data Management System

EIS has developed the Performance Data Management System (and mobile apps) which stores Athlete personal data including medical records. NGBs and HCSIs can access this system to add Athlete data in order that data is shared. PDMS is also made available to and accessed by the BOA and BPA prior to an Olympic and Paralympic Games. Medical records on PDMS are only accessible to specific medical practitioners who are allocated to a specific sport/Athlete. Athletes can also add their own data to PDMS via the online system or via the mobile app.

PDMS is also made available to and accessed by the BOA and BPA prior to an Olympic and Paralympic Games. EIS may provide NGBs with analysis and reporting services (e.g. the number of Athletes that had a consultation with a doctor in the last week).

Categories of data processed: Athlete biographical data, Athlete identity proofing and verification data, Athlete contact details, Athlete health/medical data, Athlete training and monitoring evaluation data, Athlete competition performance data and Athlete WCP programme affiliation data.

# **G. Data Categories**

UK Sport and EIS are committed to the principles of transparency, security and data minimisation and only process data where necessary to achieve a benefit for the Athletes.

The categories of data processed, as described in Section F (*Data Life Cycle*), are detailed in the appendices to this Protocol. Appendix 1 sets out the broad descriptions of the data categories whilst Appendix 2 further details the sub-categories of data that are processed on the WCP and in the high performance system generally.





# APPENDIX 1 – DATA CATEGORIES (BROAD)

Broad Data	Categories					
Data category ID	Data category description (broad)	Sub-category (foreseeable at present time)	Description	Purpose of collection / storage / analysis	Description of potential benefit of using aggregated data for research to develop future UKS funding strategies and/or DCMS reporting	Description of potential benefit of using aggregated data for research on enhancing individual Athletic performance
1	Athlete biographical data	Athlete Birth data; Athlete Genealogical data; Athlete Educational data; Athlete Ethnographic data; Athlete Career data (sporting and non-sporting)	Details of an Athlete's personal history, including date and location of birth, family background, education background, sports participation experience, and geographical location of residence(s)	Development of a better understanding of the individual Athlete to optimise communication, engagement, and targeting of relevant services; Meta-analysis of the biographical profiles of funded Athletes for the purposes of research (e.g. on-going UKS research into the distribution of social-economic backgrounds of the funded Athlete population) that supports policy delivery (i.e. DCMS)	Longitudinal analysis <b>would</b> inform better understanding of geographical and/or socioethnographic trends of funded Athlete population, thereby acting as a guide for informing strategic action	Unlikely to be of use since individual high-performing Athletes are statistical outliers by definition and socio-ethnographic and/or biographical markers of high-performance potential are likely to be complex and multi-factorial
2	Athlete identity proofing and verification data	Level 1 identity data; Level 2 identity data; Level 3 identity data; Level 4 identity data (all as defined in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015)	Various means of proving and verifying the identity of individual Athletes; this can range from a recent utility bill (level 1) all the way to a UK Biometric Residence Permit (Level 4)	Proving and verifying the identity of individual Athletes receiving direct and/or indirect financial support via UK Sport	No foreseeable research value	No foreseeable research value

3	Athlete contact details data	Next-of-kin emergency contact details	Various means of contacting the Athlete or their immediate next-of- kin, such as residential address, telephone number(s), email addresses, social media handles etc.	Maintaining contact with Athletes for the purposes of general and specific communication, distribution of relevant information, and for appropriate actions in the event of an emergency situation (e.g. informing next-of-kin)	No foreseeable research value	No foreseeable research value
4	Athlete personal financial data	Bank account details; Financial income and wealth data	Data that relates to the administration and monitoring of payments from UK Sport to supported Athletes	Administration and delivery of grant funding awards to supported Athletes (including means-testing)	Longitudinal analysis <b>could</b> inform better understanding of patterns relating to the financial status of successful vs. nonsuccessful Athletes, thereby acting as a source of knowledge for future development of individual Athlete funding strategies	Unlikely to be of use since individual high-performing Athletes are statistical outliers by definition and relationship between financial status and high-performance potential is likely to be complex and multi-factorial
5	Athlete WCP programme affiliation data	WCP membership data; WCP programme level data; WCP funding level data	Data related to an individual Athlete's membership of a UKS funded WCP and the designated level of support that they receive	Longitudinal analysis of the WCP funding (direct and indirect) support provided to individual Athletes	Longitudinal analysis would inform better understanding of funded Athlete population wide trends regarding the relationship between funding trajectory / history and performance outcomes; this knowledge would influence the development of future funding strategies	Understanding of the funding history of the individual Athlete against known trends from the funded Athlete population could help to contextualise understanding of the development and/or performance level of said individual Athlete
6	Athlete social media data	None specified	Social media metrics to track volume, type, and nature of the published (i.e. openly searchable) social media activity undertaken by individual (or groups of) Athletes	Measuring the effectiveness of any centrally and/or WCP delivered Athlete influence / engagement campaigns	Little foreseeable research value	Little foreseeable research value
7	Athlete health / medical data	Athlete Anthropometric data; Athlete Biological data; Athlete Physiological data; Athlete Biomechanical data; Athlete Kinesiological data; Athlete Psychometric data;	Data derived from tests, examinations, and investigations that seek to provide diagnostic information to inform clinical treatment of reported and/or observed symptoms of illness/injury	Optimising the individual treatment of Athletes suffering illness/injury; Regulatory compliance for clinical practitioners governed by chartership or legislative bodies; Meta-analysis of illness and/or injury trends that affect the funded Athlete population	Longitudinal analysis of injury/health trends across the entire funded Athlete population would inform understanding of the broad probability of 'failure' (Athlete career terminated by injury or illness) associated with investing in an individual Athlete, thereby increasing knowledge of the baseline 'loss ratio' associated with UKS portfolio of investment	Unlikely to be of use since individual high-performing Athletes are statistical outliers by definition and injury/illness within a particular individual is likely to be complex and multifactorial

I		Athlete Medical				
		History data				
		(conditions treated,				
		treatment				
		interventions,				
		pharmaceutical				
		history, etc.)				
8	Athlete Talent	Athlete Biological	Data derived from tests,	Selection of candidates onto	Longitudinal analysis of the outcome of	Unlikely to be of use since
	Identification	data; Athlete	examinations, and investigations that	specific 'Talent ID' Athlete	Talent ID exercises would increase	individual high-performing
	Data	Physiological data;	seek to provide evidence of aptitude	Development programmes	understanding of the impact of funding such	Athletes are statistical
		Athlete	and/or inclination towards	funded directly or indirectly by	initiatives through knowledge of the	outliers by definition and
		Anthropometric	specifically identified athletic	UK Sport; Meta-analysis of the	baseline 'loss ratio' associated with such	markers of high-performance
		data; Athlete	activities that are believed to be	profiles of successful and/or	schemes	potential are likely to be
		Biomechanical data;	associated with the likelihood of an	unsuccessful candidates		complex and multi-factorial
		Athlete	individual attaining elite level sports			
		Kinesiological data;	performance			
		Athlete				
		Psychometric data				
9	Athlete Official	Athlete official	Data derived from the completion of	Longitudinal analysis of	Longitudinal analysis of competition	Understanding of the
	Competition	competition	individual races (e.g. 'heats', 'semi-	competition performance	performance trends across the entire	competition performance
	Performance	performance	finals', and 'finals'), attempts, runs,	outcomes as a means of growing	funded Athlete population would inform	history of the individual
	Data	outcomes (i.e.	lifts, bouts, rounds, etc. undertaken	understanding of the	understanding of the broad probability of	Athlete against known
		rankings) data;	within the context of an organised	development of an individual	'failure' (Athlete not delivering desired	trends from the funded
		Athlete official	athletic competition	Athlete's ability to perform	competition performance outcomes)	Athlete population could
		competition		within the context of an	associated with investing in an individual	help to contextualise
		performance data		organised athletic competition;	Athlete, thereby increasing knowledge of	understanding of the
		(various metrics of		Meta-analysis of competition	the baseline 'loss ratio' associated with UKS	development and/or
		performance as		performance trends across	portfolio of investment	performance level of said
		recorded and		groups of Athletes to identify		individual Athlete
		published by official		patterns across the funded		
		competition		Athlete population		
		organisers including				
		but not limited to				
		distance / height				
		covered, duration,				
		judges' scores,				
<u> </u>		weight lifted, etc.)				
10	Athlete	Athlete development	Data derived from coaching	Longitudinal analysis of the	Longitudinal analysis of Athlete training and	Understanding of the
	Training	objectives data;	processes that generate (and review	generation and review of specific	development trends across the entire	training and development
	Monitoring	Athlete development	performance against) specific	athletic development objectives	funded Athlete population would inform	history of the individual
	and Evaluation	key results (i.e. rated	athletic development objectives for	for individual Athletes and	understanding of the broad training and	Athlete against known
	Data	performance against	individual Athletes for the purposes	associated prescription, delivery	development norms associated with elite	trends from the funded
		defined objectives)	of planning, prescribing, delivering,	and review of athletic training	performers	Athlete population <b>could</b>

		data; Athlete	and reviewing athletic training	programmes as a means of		help to contextualise
		prescribed training	programmes; Data derived from the	continuously improving the		understanding of the
		session data; Athlete	completion of individual efforts (or	preparation of individual Athletes		development and/or
		•	'repetitions'), and/or groups of	· ·		performance level of said
		completed training	, , , , , , , , , , , , , , , , , , , ,	for the demands of competition		•
		session data; Athlete	efforts (or 'sets'), and/or entire	performance; Meta-analysis of		individual Athlete
		performance data	sessions of general and/or specific	training delivery and review		
		(various metrics of	athletic training that aims to prepare	trends across groups of Athletes		
		performance	Athletes for the demands of	to identify patterns across		
		including but not	competition performance	coaching groups and/or athlete		
		limited to distance /		development programmes;		
		height covered,		Longitudinal analysis of training		
		duration of effort,		performance indicators /		
		speed of effort,		outcomes as a means of		
		mechanical power,		optimising the quantity and type		
		judges' scores,		of training to prepare individual		
		weight lifted, etc.);		Athletes for the demands of		
		Athlete Biological		competition performance; Meta-		
		data; Athlete		analysis of training performance		
		Physiological data;		trends across groups of Athletes		
		Athlete		to identify patterns across		
		Anthropometric		coaching groups, Athlete		
		data; Athlete		development programmes, and		
		Biomechanical data;		the entire funded Athlete		
		Athlete		population		
		Kinesiological data;				
		Athlete				
		Psychometric data;				
		Athlete's Subjective				
		Rating of Training				
		Performance data;				
		Coach's Rating of				
		Athlete Training				
		Performance data				
		(including actual				
		feedback provided)				
11	Athlete	Athlete official	Data generated by an Athlete's	Longitudinal analysis of	Longitudinal analysis of competition	Understanding of the
1	Support Team	performance data	Coaching Support Team derived from	competition performance	performance trends across the entire	competition performance
	Generated	(various metrics of	the completion of individual races	indicators as a means of growing	funded Athlete population <b>would</b> inform	history of the individual
	Competition	performance	(e.g. 'heats', 'semi-finals', and	understanding of the	understanding of the broad probability of	Athlete against known
	Performance	including but not	'finals'), attempts, runs, lifts, bouts,	development of an individual	'failure' (Athlete not delivering desired	trends from the funded
	Data	limited to distance /	rounds, etc. undertaken within the	Athlete's ability to perform	competition performance outcomes)	Athlete population <b>could</b>
		height covered,	context of an organised athletic	within the context of an	associated with investing in an individual	help to contextualise
		duration of effort,	competition	organised athletic competition;	Athlete, thereby increasing knowledge of	understanding of the
L		adiation of chort,	competition	orbanised atmetic competition,	Admicte, dicreby increasing knowledge of	anacistanding of the

speed of effort,	Meta-analysis of competition	the baseline 'loss ratio' associated with UKS	development and/or
mechanical power,	performance trends across	portfolio of investment	performance level of said
judges' scores,	groups of Athletes to identify	portions of investment	individual Athlete
weight lifted, etc. as	patterns across coaching groups,		marviadar/temete
provided by sensors	Athlete development		
owned and operated	programmes, and the entire		
by the official	funded Athlete population		
competition	runded Atmete population		
organisers); Athlete			
non-official			
performance data			
(various metrics of			
performance			
including but not limited to distance /			
height covered,			
duration of effort,			
speed of effort,			
mechanical power,			
judges' scores,			
weight lifted, etc. as			
measured by sensors			
owned and operated			
by the Athlete's			
coaching and			
support team);			
Athlete Biological			
data; Athlete			
Biomechanical data;			
Athlete			
Kinesiological data;			
Athlete			
Psychometric data;			
Athlete's Subjective			
Rating of			
Competition			
Performance data;			
Coach's Rating of			
Athlete Competition			
Performance data			
(including actual			
feedback provided)			

# **APPENDIX 2 – DATA CATEGORIES (SUB-TYPES)**

Data sub-types	Data sub-types						
Data category ID	Data category description (broad)	Sub-type	Meaning	Example(s)			
1	Athlete biographical data	Athlete Birth data	Data pertaining to date and location of Athlete's birth	Date of birth			
2	Athlete biographical data	Athlete Genealogical data	Data pertaining to an Athlete's family history	Identity of Mother, Father, etc.			
3	Athlete biographical data	Athlete Educational data	Data pertaining to an Athlete's educational history	Qualifications attained (e.g. GCSEs), Academic institutions attended and relevant dates			
4	Athlete biographical data	Athlete Ethnographic data	Data pertaining to an Athlete's social, ethnic, and/or cultural identity	Ethnic origin, religious beliefs			
5	Athlete biographical data	Athlete Career data (sporting and non-sporting)	Data pertaining to an Athlete's sporting and non-sporting (employment) history	Sports club membership / affiliation (with relevant dates), Coaching relationships, work history and employer details, employment status			
2	Athlete identity proofing and verification data	Level 1 identity data	As defined in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)	As provided in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)			
2	Athlete identity proofing and verification data	Level 2 identity data	As defined in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)	As provided in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)			
2	Athlete identity proofing and verification data	Level 3 identity data	As defined in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)	As provided in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)			
2	Athlete identity proofing and verification data	Level 4 identity data	As defined in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)	As provided in CESG Good Practice Guide No. 45, Validating and Verification of an Individual, Issue 2.4, published October 2015 (available online)			
3	Athlete contact details data	Next-of-kin emergency contact details	Data pertaining to the identity of, and means of contacting, an Athlete nominated responsible kinsperson who should be contacted in the event of an emergency situation involving the Athlete	Identity of an Athlete nominated kinsperson (e.g. their Mother) with full details of that person's name, domestic address, telephone number(s), and email address, etc.			
4	Athlete personal financial data	Bank account details	Data pertaining to an Athlete's nominated personal bank account	Bank Account number, sort-code, and designated branch address			

4	Athlete personal	Financial income and wealth data	Data pertaining to an Athlete's current	HMRC P60 data, employee wage slips, HMRC Tax Return, Records of monetary
	financial data		personal income and accumulated wealth	savings, Records of property ownership
5	Athlete WCP programme affiliation data	WCP membership data	Data pertaining to an Athlete's history of affiliation to defined UKS supported World Class Programmes	Records of membership of defined UKS supported World Class Programmes with relevant dates
5	Athlete WCP programme affiliation data	WCP programme level data	Data pertaining to an Athlete's programme level (e.g. Podium, Podium Potential, etc.) progression during their history of affiliation to defined UKS supported World Class Programmes	Records of membership of defined UKS supported World Class Programmes with relevant dates and details of programme level attained
5	Athlete WCP programme affiliation data	WCP funding level data	Data pertaining to an Athlete's funding level (e.g. Band A, Band B, etc.) progression during their history of affiliation to defined UKS supported World Class Programmes	Records of membership of defined UKS supported World Class Programmes with relevant dates and details of funding level attained
6	Athlete social media data	None specified	Data relating to the published social media activity generated by an individual Athlete	Twitter posts
7	Athlete health / medical data	Athlete Anthropometric data	Data pertaining to measurements of an Athlete's physical stature and body dimensions	Height, bodyweight, limb length, body composition (e.g. lean body mass and % body fat)
7	Athlete health / medical data	Athlete Biological data	Data pertaining to monitoring or analysis of biological sub-systems within the body	Chemical analysis of metabolites in extracted blood or urine
7	Athlete health / medical data	Athlete Physiological data	Data pertaining to monitoring or analysis of the physiological functioning of the Athlete's body	Lung function tests (e.g. spirometry to measure lung volumes), Tests of maximal oxygen uptake
7	Athlete health / medical data	Athlete Biomechanical data	Data pertaining to mechanical forces acting on, or exerted by, the Athlete's body	Hand grip-strength dynonometer testing, force plate testing during a 'jump test'
7	Athlete health / medical data	Athlete Kinesiological data	Data pertaining to analysis of the movement characteristics of the Athlete's body	Specific joint range-of-motion tests conducted by a qualified Physiotherapist
7	Athlete health / medical data	Athlete Psychometric data	Data pertaining to measurement and analysis of the Athlete's mood / psychological status	Profile of Mood States (PoMS) questionnaire
7	Athlete health / medical data	Athlete Medical History data (conditions treated, treatment interventions, pharmaceutical history, etc.)	Data pertaining to the history of medical consultations, diagnoses, and treatments prescribed during the course of official interactions between an Athlete and an accredited medical practitioner	Medical notes and records produced by a Physiotherapist, Psychologist, Nutritionist, or Clinical Medical practitioner during the course of consultations / treatments involving an individual Athlete

8	Athlete Talent Identification Data	Athlete Biological data	Data pertaining to monitoring or analysis of biological sub-systems within the body	Chemical analysis of metabolites in extracted blood or urine
8	Athlete Talent Identification Data	Athlete Physiological data	Data pertaining to monitoring or analysis of the physiological functioning of the Athlete's body	Lung function tests (e.g. spirometry to measure lung volumes), Tests of maximal oxygen uptake
8	Athlete Talent Identification Data	Athlete Anthropometric data	Data pertaining to measurements of an Athlete's physical stature and body dimensions	Height, bodyweight, limb length, body composition (e.g. lean body mass and %body fat)
8	Athlete Talent Identification Data	Athlete Biomechanical data	Data pertaining to mechanical forces acting on, or exerted by, the Athlete's body	Hand grip-strength dynonometer testing, force plate testing during a 'jump test'
8	Athlete Talent Identification Data	Athlete Kinesiological data	Data pertaining to analysis of the movement characteristics of the Athlete's body	Specific joint range-of-motion tests conducted by a qualified Physiotherapist, running stride length / frequency
8	Athlete Talent Identification Data	Athlete Psychometric data	Data pertaining to measurement and analysis of the Athlete's mood / psychological status	Profile of Mood States (PoMS) questionnaire
9	Athlete Official Competition Performance Data	Athlete official competition performance outcomes (i.e. rankings) data	Data provided via competition organisers that classifies the official final outcome of a competitive sporting event	The final ranking of individual competitors or teams in a particular competition event
9	Athlete Official Competition Performance Data	Athlete official competition performance data (various metrics of performance as recorded and published by official competition organisers including but not limited to distance / height covered, duration, judges' scores, weight lifted, etc.)	Data provided via commercial suppliers and/or competition organisers that pertains to the performance outcomes delivered by an individual Athlete and/or teams participating in a competitive sporting event	Distance thrown in each round by individual Athletes in a Track and Field Javelin competition, weight lifted by individual Athletes during each round of a Weightlifting competition, Goals scored by teams competing in a Field Hockey match
10	Athlete Training Monitoring and Evaluation Data	Athlete development objectives data	Data describing personal development objectives assigned to an individual Athlete for the purposes of enhancing their overall competition performance potential	A description of a body composition improvement objective (e.g. increase lean body mass), a description of an event 'pacing' improvement objective
10	Athlete Training Monitoring and Evaluation Data	Athlete development key results (i.e. rated performance against defined objectives) data	Data describing an agreed performance rating metric that relates to a defined Athlete development objective	RAG (Red, Amber, Green) rating, rating out of 10 (perhaps from Coach's and Athlete's perspective)
10	Athlete Training Monitoring and Evaluation Data	Athlete prescribed training session data	Data describing the type and quantity of performance-related training <b>prescribed</b> by a Coaching team working with an individual Athlete	Exercises/Weights/Sets/Reps for a Strength and Conditioning programme, Metres of swimming during an individual training session (potentially including some measure of swimming speed and/or 'intensity')

10	Athlete Training Monitoring and Evaluation Data	Athlete completed training session data	Data describing the type and quantity of performance-related training <b>completed</b> by an individual Athlete	Exercises/Weights/Sets/Reps for a Strength and Conditioning programme, Metres of swimming during an individual training session (potentially including some measure of swimming speed and/or 'intensity')
10	Athlete Training Monitoring and Evaluation Data	Athlete performance data (various metrics of performance including but not limited to distance / height covered, duration of effort, speed of effort, mechanical power, judges' scores, weight lifted, etc.)	Data describing the performance outcomes delivered by an individual Athlete during the course of their performance-related training activities	Time to 15m for a Swimmer, 'Flying' 30m for a Track and Field Sprint Athlete, Distance thrown by a Discus Thrower
10	Athlete Training Monitoring and Evaluation Data	Athlete Biological data	Data pertaining to monitoring or analysis of biological sub-systems within the body	Chemical analysis of metabolites in extracted blood or urine
10	Athlete Training Monitoring and Evaluation Data	Athlete Physiological data	Data pertaining to monitoring or analysis of the physiological functioning of the Athlete's body	Lung function tests (e.g. spirometry to measure lung volumes), Tests of maximal oxygen uptake
10	Athlete Training Monitoring and Evaluation Data	Athlete Anthropometric data	Data pertaining to measurements of an Athlete's physical stature and body dimensions	Height, bodyweight, limb length, body composition (e.g. lean body mass and %body fat)
10	Athlete Training Monitoring and Evaluation Data	Athlete Biomechanical data	Data pertaining to mechanical forces acting on, or exerted by, the Athlete's body	Hand grip-strength dynonometer testing, force plate testing during a 'jump test'
10	Athlete Training Monitoring and Evaluation Data	Athlete Kinesiological data	Data pertaining to analysis of the movement characteristics of the Athlete's body	Specific joint range-of-motion tests conducted by a qualified Physiotherapist, running stride length / frequency
10	Athlete Training Monitoring and Evaluation Data	Athlete Psychometric data	Data pertaining to measurement and analysis of the Athlete's mood / psychological status	Profile of Mood States (PoMS) questionnaire, Athlete self-rating of sleep quality, Athlete self-rating of current fatigue state
10	Athlete Training Monitoring and Evaluation Data	Athlete's Subjective Rating of Training Performance data	Data pertaining to an individual Athlete's self-rating of their own performance during the course of performance-related training	Rating of Perceived Exertion (RPE), Duration of individual training sessions
10	Athlete Training Monitoring and Evaluation Data	Coach's Rating of Athlete Training Performance data (including actual feedback provided)	Data pertaining to a Coach's rating of an individual Athlete's performance during the course of performance-related training	Rating of perceived effort by the athlete, Duration of individual training sessions, Qualitative observations on the quality and/or quantity of training activity

11	Athlete Support Team Generated Competition Performance Data	Athlete non-official performance data (various metrics of performance including but not limited to distance / height covered, duration of effort, speed of effort, mechanical power, judges' scores, weight lifted, etc. as measured by sensors owned and operated by the Athlete's coaching and support team)	Data provided by an Athlete's Coaching Support Team that pertains to the performance outcomes delivered by an individual Athlete and/or teams participating in a competitive sporting event	Athlete's velocity and/or distance covered as measured by Athlete-mounted GPS or Accelerometry sensors, Mechanical power output generated by a Track Cyclist as measured by a Crankset strain-gauge (e.g. SRM Powercranks) type system, Athlete split-distance times as derived from video-based timing systems
11	Athlete Support Team Generated Competition Performance Data	Athlete Biological data	Data pertaining to monitoring or analysis of biological sub-systems within the body	Chemical analysis of metabolites in extracted blood or urine (e.g. post-event Blood lactate concentration)
11	Athlete Support Team Generated Competition Performance Data	Athlete Biomechanical data	Data pertaining to mechanical forces acting on, or exerted by, the Athlete's body	Peak mechanical torque generated by a Track Cyclist as measured by a Crankset strain-gauge (e.g. SRM Powercranks) type system
11	Athlete Support Team Generated Competition Performance Data	Athlete Kinesiological data	Data pertaining to analysis of the movement characteristics of the Athlete's body	Running stride length / frequency, Distance-per-stroke for a Sprint Canoeist or Rowing Crew
11	Athlete Support Team Generated Competition Performance Data	Athlete Psychometric data	Data pertaining to measurement and analysis of the Athlete's mood / psychological status	Athlete self-rating of sleep quality evening prior to event, Athlete self-rating of current fatigue state or energy level on competition day
11	Athlete Support Team Generated Competition Performance Data	Athlete's Subjective Rating of Competition Performance data	Data pertaining to an individual Athlete's self-rating of their own performance during the course of performance-related training	Rating of Perceived Exertion (RPE), Qualitative observations on the perceived quality of race/event performance
11	Athlete Support Team Generated Competition Performance Data	Coach's Rating of Athlete Competition Performance data (including actual feedback provided)	Data pertaining to a Coach's rating of an individual Athlete's performance during the course of performance-related training	Rating of perceived effort by the athlete, Qualitative observations on the quality of the competition performance

## **APPENDIX 3 – DATA RETENTION**

#### **RETENTION PERIODS**

- 1. Retention Periods only relate to UK Sport and EIS and not NGBs.
- 2. Reference data will be deleted no later than the end of the relevant quarter following expiry of the stated retention period.
- 3. Retention periods are set for practical reasons and depending on an athlete's progression through the performance pathway.
- 4. Except for indefinite periods the retention periods cannot be extended unless the athlete has provided their consent or the data is anonymised.

Activity	Data Types	Retention Period	Comments	Data Type Deleted and/or Destroyed	Data kept for research and trend analysis purposes
Talent Identification (see section F 1.2)	Athlete contact details Athlete identity proofing and verification data Athlete biographical data Athlete talent identification data	Selected Athletes 7 years after leaving the WCP  Non-Selected Athletes 7 years after the talent identification programme has ended	Kept for the period the athlete is on the WCP and retained for 7 years after leaving the WCP  Retained for 7 years after the talent identification programme the Athlete has applied for has ended	Athlete contact details Athlete identity proofing and verification data	Athlete biographical data

Activity	Data Types	Retention Period	Comments	Data Type Deleted and/or Destroyed	Data kept for research and trend analysis purposes
Enrolment on to Athlete Medical Scheme (see section F 2.1)	Athlete contact details Athlete identity proofing and verification data Athlete genealogical data	6 years	Retained for 6 years after the Athlete has been deselected for enrolment or has left the sport	Athlete contact details Athlete identity proofing and verification data	Athlete genealogical data
Nomination on to the WCP (see section F 2.1)	Athlete contact details Athlete identity proofing and verification data Athlete genealogical data	6 years after leaving the WCP	Kept for the period the Athlete is on the WCP and retained for 6 years after leaving the WCP	Athlete contact details Athlete identity proofing and verification data	Athlete genealogical data
Athlete Performance Award Application (see Section F 2.2 & 2.3)	Athlete contact details Athlete identity proofing and verification data Athlete personal financial data Athlete biographical data	6 years after last application or leaving the WCP	Kept for the period the athlete is on the WCP and retained for 6 years after last application or leaving the WCP.	Athlete contact details Athlete identity proofing and verification data Athlete personal financial data	Athlete gender, age, town, home country and sport  Athlete biographical data,
Sports Intelligence Database and Data licensed to UK Sport by Gracenote (see Section D 2 and F 2.3)	Athlete biographical data Athlete Official Competition Data Athlete WCP programme affiliation data	Indefinite	No Athlete contact details Athlete identity proofing and verification data would be retained. Indefinite because this is licensed from Gracenote who collate this from	N/A	Yes this is necessary to identify long term trends and conduct analysis that will shape future athlete selection, progress through the performance pathway

Activity	Data Types	Retention Period	Comments	Data Type Deleted and/or Destroyed	Data kept for research and trend analysis purposes
			publicly available results data		and support UK Sport funding decisions
NGB commissions sports science, medicine etc. services from EIS (see sectionF 2.4)	Athlete contact details Athlete identity proofing and verification data	25years	The data is kept whilst the athlete is on the WCP and are being provided to the sport and then for starting from end of 6 months period after the athlete has left the WCP. This is because the athlete continues to receive certain services for a period of 6 months after leaving the WCP	No Athlete contact details Athlete identity proofing and verification data would be retained	None
EIS WCP Services (see section F 3.2 and F 3.3)	Athlete biographical data, Athlete health / medical data, Athlete Talent Identification Data, Athlete Official Competition Performance Data, Athlete Training Monitoring and Evaluation Data, Athlete Support Team Generated	25 years	The data is kept whilst the athlete is on the WCP and are being provided to the sport and then for 25 years starting from end of 6 months period after the athlete has left the WCP. This is because the athlete continues to receive certain services for a period of 6 months after leaving the WCP	Athlete biographical data, Athlete Talent Identification Data,	Athlete health / medical data, Athlete Training Monitoring and Evaluation Data, Athlete Support Team Generated Competition Performance Data

Activity	Data Types	Retention Period	Comments	Data Type Deleted and/or Destroyed	Data kept for research and trend analysis purposes
	Competition Performance Data				
EIS PDMS (see section F 3.1 and 3.4)	Athlete biographical data, Athlete identity proofing and verification data, Athlete contact details, Athlete health/medical data, Athlete training and monitoring evaluation data, Athlete competition performance data and Athlete WCP programme affiliation data.	25 years	The data is kept on the system for the period the athlete has consented and retained for a period of 25 years following the date of the last entry on to the system	Athlete biographical data, Athlete identity proofing and verification data, Athlete contact details,	Athlete health/medical data, Athlete training and monitoring evaluation data, Athlete competition performance data and Athlete WCP programme affiliation data in order to enhance the quality of care available for future athletes.