DATA PROTECTION PROTOCOL FOR ATHLETES
v.5

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A. Introduction to this Protocol

1. Who is this Protocol Relevant to?

This Protocol is relevant to "**Athletes**" involved in the high performance system. These are Athletes who are:

- identified and confirmed through a talent identification programme and are at Performance Foundation Programme level in a **National Governing Body** (**"NGB"**), who receive Performance Pathway support and assistance from **United Kingdom Sports Council** ("**UK Sport**") and the **UK Sports Institute** ("**UKSI**");
- nominated and selected by NGBs onto the **World Class Programme** ("**WCP**") and receive support and assistance from the Inter-disciplinary Support Team;
- serviced by UKSI or a **Home Country Sports Institute** ("**HCSI**"); and/or
- enrolled on the Athlete Medical Scheme because the NGB has paid for their inclusion or who are a member of the NGB's WCP.

Where Athletes are under the age of 18, an Adult at Risk[1] or lacks the legal capacity to make their own decisions then this Protocol is for the parents/guardians or a person with legal responsibility of the Athletes.

2. Whose practices does this Protocol Reflect?

This Protocol reflects the data protection practices of UK Sport and UKSI.

Please see Section B below for more information on the roles of both organisations.

This Protocol does not cover the Performance Data Management System ("**PDMS**"). UKSI developed the PDMS to provide NGBs with a secure online database to hold Athlete medical data.

For detailed information about the use of Athlete data in the context of PDMS, please see UKSI' updated Athlete Privacy Notice ('APN'), which can be found here:

https://uksportsinstitute.co.uk/wp-content/uploads/2023/05/UKSI-Athlete-Privacy-Notice.pdf

3. What information about Athletes is covered by this Protocol?

In order to function effectively, UK Sport and UKSI collect a range of "personal data" and "special categories of personal data" but only where relevant and proportionate to UK Sport and UKSI' services and activities. Details of the

1 The meaning of this is contained in the Safeguarding Vulnerable Groups Act 2006 (as amended) categories of personal data processed are set out in Section C (Data Life Cycle) of this Protocol, with further information given in Appendix 1.

(i) 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.

Personal data about Athletes is referred to in this Protocol as "**Athlete data**".

(ii) What are Special categories of Personal Data, and how do we treat it differently to Personal Data?

"Special categories of personal data" is personal data which is treated differently because it reveals 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.

All Athletes are fully informed of the intended scenarios for processing their special category personal data (see Appendix 1).

UK Sport or UKSI will process special categories of personal data where there is an appropriate lawful basis to do so, which could include:

- it has Athletes' explicit consent
- processing relates to personal data which are made public by the Athlete;
- UK Sport is under a legal obligation to do so;
- where processing is necessary for reasons of substantialpublic interest;
- where processing is necessary to protect the vital interests of the Athlete.

4. What happens if we change this Protocol?

We may update this Protocol from time to time so please check Athlete Zone or the UK Sport website for most up-to-date version. We will notify Athletesof the material changes where required by law to do so.

B. Role of UK Sport and UKSI

Role of UK Sport

UK Sport is responsible for investment into the high performance system at both a strategic and operational level. 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).

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

For more information on UK Sport, please visit our website: www.uksport.gov.uk

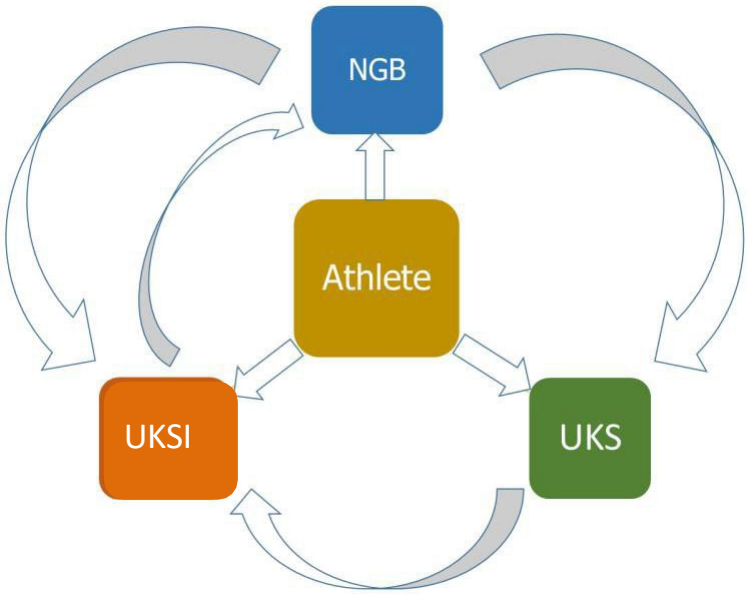
2. Role of the UKSI

The UKSI is a subsidiary of UK Sport and is the country's largest provider of sport science, medicine and technology, the UKSI also provides a range of added-value benefits to the sports UKSI works with, including world-class performance environments and access to cutting edge innovation and research. UKSI practitioners help coaches and performance directors to improve the performance of their athletes by delivering services which enable them to optimise training programmes, maximise performance in competition and improve the health and wellbeing of Athletes.

For more information on UKSI, please visit our website: www.eis2win.co.uk

C. Data Life Cycle

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 section uses examples from the major data flows involved in the data life cycle to illustrate how data flows in the high performance system.

1. Talent Identification



Note that boxes 3 and 4 may be repeated when new Athlete data is collected via consent forms and questionnaires.

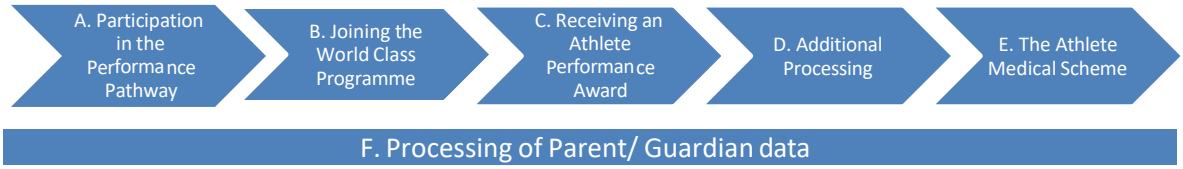
2. Nomination for and on the WCP Flowchart (UK Sport data flows)



D. Processing Purposes and Legal Bases

Appendix 1 to this Protocol explains the purposes to which UK Sport and UKSI put Athlete data and Parent/Guardian data, and the legal basis upon which UK Sport and UKSI relies to do so. For the purposes of this Section D and Appendix 1, the Athlete journey can be summarised as follows (although all stages may not apply to you).

1. Processing Purposes



	Which parts of Appendix 1 apply to me?
I am a talented or Performance Foundation Athlete starting on the Performance Pathway	**Part A**
I am an Athlete on the World Class Programme	**Parts A and B**
I am an Athlete who received an Athlete Performance Award	**Parts A, B and C**
Additional Processing	**Parts A, B, C and D**
The Athlete Medical Scheme	**Parts E (and any other of Parts A-D above applicable to you)**
I am a Parent/Guardian of an Athlete	**Part F** **(Note that Parts A – E, as applicable, above will apply to the Athlete themselves)**

2. Legal Bases

Legal Bases	Description
Consent (and explicit consent)	This is where UK Sport or UKSI will ask you to 'opt-in' to agree to processing your data in a certain way. E.g. we will ask for consent to send direct marketing to you via the Athlete Zone. If we ask for consent to process Special Category Data, this will be explicit.
Exercise of official authority	UK Sport is granted, under Royal Charter, official authority under its objects. Details of these can be found in our Royal Charter, found in Appendix 2.
Contract	We enter into grant agreements with Athletes (such as the APA). We are required to process data to complete actions required under these contracts.
Substantial public interest	We administer public funding, as well as providing a vital role in elite sports within the UK. As such, some processing activities will be in the public interest.
Legal obligation	We may be required to process data to comply with certain legal obligation, including compliance with anti-doping, contracts and other legal or regulatory frameworks which apply to us.
Vital interests	This lawful basis would only be used where it is in your vital interests e.g. in the event of an accident or injury.
Legitimate Interests	As a public body, we are only permitted to use legitimate interest where this is not in accordance with our public functions. If we use legitimate interest as a lawful basis, we would conduct an assessment to ensure your rights are protected.
Where data has manifestly been made public you	This will only apply to Special Category data which has been made public by you.
Necessary for scientific, historical or statistical research	This would apply to research that we perform, in particular statistical research. At all times we will ensure that personal data is kept securely and that any research will not be used to make decisions on specific individuals.

E. Third Parties which UK Sport/UKSI

This section sets out the parties with whom UK Sport and UKSI share Athlete data.

1. Performance Teams

a) High Performance Teams

High performance sport involves a wide range of parties often working collaboratively in an environment to provide expert services and solutions for all Athletes on the WCP. Athlete data needs to be shared between inter-disciplinary teams within UK Sport, NGBs, UKSI, 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 and UK Sport and/or the UKSI share data to administer these functions. 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.

- **UKSI** are service providers to the NGB's require Athlete data in order to provide these services and to improve, share best practice and knowledge across all sports. For further details on UKSI' use of your personal data, please see: https://uksportsinstitute.co.uk/wp-content/uploads/2023/05/UKSI-Athlete-Privacy-Notice.pdf

- UKSI and UKS receive Athlete data from **HCSI's** to improve practice across the UK high-performance system. As the HCSI where the Athlete lives (England, Wales, Scotland or Northern Ireland) may also fund similar schemes run by the relevant governing body that may have a connection with, or impact on the WCP and may involve the Athlete or the governing body receiving National Lottery funds from them directly we may share Athlete data with them. We will also share data so that HCSIs can offer sport science and sports medicine.

- **The British Olympic Association** and **The British 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.

- **Universities & Further Education** will require Athlete data where either UK Sport or UKSI commission academic research into the high performance system with by under graduate and post-graduate students.

b) Individual stakeholders

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

- **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, UKSI, 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
  - Performance Nutritionists
  - Performance Lifestyle practitioners
  - Strength and Conditioning practitioners
  - Massage Therapists
  - 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 **not** bound by professional codes of conduct with regard to confidentiality including:-
  - Coach

- Manager
- Performance Directors and Advisors, UKSI 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. Suppliers

In order for UK Sport and UKSI 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 UKSI ensure that all suppliers act strictly in accordance with specific instructions and are monitored and audited on a regular basis.

Name	Function
Microsoft Azure	Hosting IT services which UK Sport use to operate computer systems
BUPA	Arrange and provide medical services and treatments to Athletes under the Athlete Medical Scheme

Gracenote Inc.	Provide performance data and results data for analysis, selection onto the WCP and to assess any Athlete Performance Award. This data feeds into the existing Athlete data record. The Sport Intelligence teams at UK Sport and UKSI provide names and dates of birth to Gracenote to link to performance results.

Please note that this is not an exhaustive list and data may be shared with other providers of UK Sport and UKSI who supply services. This data will only be shared for the purposes set out in this Protocol.

3. Others

We will also provide Athlete data to:

- **Department for Digital, Culture, Media and Sport (DCMS) or MPs in the Athletes' constituency** – These may request information about Athletes, for example in order to write to Athletes in relation to the sport practiced by that Athlete.

F. Profiling

UK Sport and UKSI will process certain Athlete data (predominantly age and performance data) to create a rating system on Athletes. Situations where profiling occurs are:

- Talent Identification in the Pathway process before joining the WCP;
- Performance monitoring within sport intelligence.

UK Sport and UKSI will collate this Athlete data from a variety of sources to conduct this profiling. This includes:

- Results data obtained from Suppliers (such as Gracenote);
- Data direct from the athlete;
- Data provided by NGB's;
- Opinions from coaches.

UK Sport and UKSI will use the results of profiling activities to review, discuss and implement decisions in relation to:

- Funding decisions with NGBs;
- Nomination to podium and podium potential for APA funding.

It is important to note that decisions are made with human input i.e. they are not automated or determined by algorithms.

G. Athlete rights

Alongside relying on UK Sport and UKSI meeting their obligations, Athletes have a number of rights that they are entitled to exercise. UK Sport and UKSI are committed to protecting these rights and train all staff so that they can respond appropriately.

- **Right to be informed:** This is the right to be informed as to how Athlete data is processed, which this Protocol does.

- **The right to object:** This allows Athletes to object to processing based on 'legitimate interest' and right to ask UK Sport and UKSI not to process personal data to send direct marketing (this can be done by not opting in to contact or unsubscribing from emails).

- **Right of access:** Athletes have certain rights to request a copy of their own personal data held by UK Sport and UKSI.

- **Right to rectification:** Athletes have the right to ask us to rectify inaccurate or incomplete personal data which we have about them.

- **Right to erasure:** Athletes have the right to ask us to erase their personal data in some circumstances, including where the information which we hold is no longer necessary for the purposes for which we process it, the Athlete withdraws their consent to its use, or we can no longer lawfully process the data.

- **Right to restriction of processing**: Athletes can restrict our processing of their data in some circumstances.

- **Right to data portability**: This permits the Athlete to receive from UK Sport or UKSI 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 UKSI to another data controller or have the data transmitted directly between two data controllers.

- **Right to object to automatic processing**: Athletes have the right not to be subject to decisions based solely on automated processing which significantly affect them.

An Athlete can exercise each right by contacting UK Sport's or UKSI' Data Protection Officer, whose details are in Section I.

H. Sending Athlete Data Overseas

UK Sport and UKSI may transfer Athlete data to countries outside the UK and the European Economic Area (EEA) in situations such as:

- sending Athlete data to other organisations; and
- accessing Athlete data whilst in countries outside the EEA (such as whilst attending the Olympic Games overseas).

Whenever we transfer your personal data out of the UK and the EEA to other organisations, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government; or
- Where we use certain Suppliers, we may use specific contracts approved by the UK government which give personal data the same protection it has in the UK.

I. Questions and Complaints

1. How can I contact UK Sport and UKSI's Data Protection Officers about Data Protection matters or applying rights to Athlete data?

UK Sport 6th Floor 10 South Colonnade London E14 4PU E: dataprotection@uksport.gov.uk	**UK Institute Sports Institute** The Manchester Institute of Health and Performance, 299 Alan Turing Way, Manchester, M11 3BS E: dataprotection@Uksportsinstitute.co.uk T: 0870 759 0400

2. How can I complain to the Supervisory Authority about Data Protection matters?

Athletes have the right to complain about how UK Sport or UKSI treats Athlete data to the privacy regulator in the country in which you live. In the UK, this is the Information Commissioner's Office (the "**ICO**"). The ICO can be contacted at:

- **Address**: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Telephone**: 0303 123 1113 (local rate) or 01625 545 745
- **Email**: https://ico.org.uk/global/contact-us/email/

Appendix 1 - Purposes To Which We Put Athlete Data

This Appendix explains:

- the categories of data processed by UK Sport and UKSI;
- the purposes to which UK Sport and UKSI process Athlete data and Parent/Guardian data;
- the legal basis upon which UK Sport and UKSI relies to do so; and
- The retention period that applies (if applicable)

Categories

UK Sport and UKSI process a number of different types of data, which constitute Athlete data. To ensure the table is easy to follow, we have broken down the Athlete data into high-level categories. Please note that if a category is listed, not all the data included in that category is used for the purpose, both UK Sport and UKSI will take steps to minimise any data to what is necessary for each specific purpose.

CATEGORIES	ATHLETE DATA INCLUDED IN CATEGORY
Identity data	Name, Gender, DOB, Performance Reference Number, Photograph, Video, Age, Academic Background, Region, and social media accounts.
Contact data	Home phone number, email address, home address and mobile phone number
Sport & performance data	Athlete Performance Award grade (APA) and award value, training location, sport discipline, medals, attendance at games, home nation, time on programme, height, weight, test data, performance trajectory, sports intelligence, NGB feedback, eligibility data, criminal convictions, racial or ethnic origin, health data, right to work, physiological data, biometric data, athlete status, nationality, ranking information, event results, Olympic or Paralympic athlete, selection date, gender, leaving date, career aspirations and sporting interests.
Equal opportunities data	Gender, racial or ethnic origin, sexual orientation, age, criminal convictions.

Health data	Test data, sickness and injury, doping violations and biometric data, medical records and other athlete health/performance information.
Finance data	Benefits from Department of Work & Pensions, credit card statements, payslips, tax returns, company accounts, bank accounts

Retention

The column marked 'Retention' sets out how we long we keep Athlete data. Different retention periods are applied to different data categories depending on the activity for which the personal data is being used.

Once the retention period is over, Athlete data shall be securely deleted, destroyed or anonymised unless it is used for purposes of historical, scientific or statistical research, which will only take place with appropriate safeguards in accordance with Data Protection Law.

Please note that where Athlete data is shared with third parties (except Suppliers), their retention periods will apply.

PART A. ATHLETES ON THE PERFORMANCE PATHWAY

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Run assessment days • We collect the data provided from Athletes at sign-up stage and use this to make a decision/ assist NGBs to make a decision about whether to invite Athletes to testing days. • We use data from the various questionnaires to ensure that Athletes are able	Consent (which shall be explicit for any Special Category Personal Data)	Identity data Sport and Performance data Contact data Health data	Athletes Selected to a development programme/ WCP = 8 years after leaving WCP Athletes selected to attend assessment days = 8 years from completion of recruitment programme Not selected, not attended or not invited = 6

to come to testing days. • We collect data about Athletes on the testing day			months after assessment
Assist NGBs with selection of Athletes • Collecting performance data recorded during testing days/ assessment days. • Provide reports to NGBs to select athletes for their talent pool, Performance Foundation Programme Level of performance pathway or the World Class Programme, including by building a profile on Athletes; • Providing capability data based on historical performance and other observations.	Consent (which will be explicit for Special Category Personal Data)	As above	As above
Research and analysis to improve our understanding about potential talent within the UK	Consent (which will be explicit for Special Category Personal Data)	As above	8 years

Carrying out the Athlete Pipeline Health Check UK Sport and UKSI track information about Athletes and their progress to understand and learn how to improve the high performance system. UK Sport and UKSI provide information to NGBs to assist them to understand athlete pathways within their sport	Exercise of official authority Where Special Category Personal Data is used the legal basis is explicit consent		8 years after leaving WCP
Ad-Hoc Research Requests made by NGBs NGBs may commission research which requires Athlete data from UK Sport and UKSI	Consent (which shall be explicit for Special Category Personal Data)	As per the statement of work between NGB and UK Sport/UKSI at the time of request. By way of example, the Athlete data is likely to be: Identity data Sport and Performance data Health data	Duration of research project
Learning and Development To comply with the Whyte Review, UK Sport and UKSI collect data to support athlete development through mandatory and optional e-learning modules on safeguarding, wellbeing, and high-performance ethics, ensuring	Public task Consent (which shall be explicit for any Special Category Personal Data)	Identity data, Contact data	2 years after leaving WCP

compliance and tracking participation.			
Athlete Promotional Activities (Media and PR, and National Lottery Appearances) UK Sport may use information about Athletes (such as name, photographs, and information about your sporting activities) in order to promote UK Sport or the National Lottery: • on our website and other publications such as our Annual Review or that relate to the WCP and to ask you to make promotional appearances; • to make requests to attend photo shoots, meetings and other promotional events.	Exercise of official authority Contract with data subject Consent	Identity data Contact data (not to be released)	As set out in the contract with NGBs and Athletes.
Learning and Development To comply with the Whyte Review, UK Sport and UKSI collect data to support athlete development through mandatory and optional e-learning modules on safeguarding, and high-performance ethics, ensuring compliance and tracking participation.	Public task Consent (which shall be explicit for any Special Category Personal Data)	Identity data Contact data	2 years after leaving WCP

PART B. ATHLETES ON THE WORLD CLASS PROGRAMME

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Making decisions about Athlete eligibility to participate on the WCP • We monitor compliance with our 'Eligibility Policy' • We will make funding decisions about an Athlete's ability to receive public funding on the basis of this information.	Exercise of official authority Substantial public interest	Identity data Contact data Sport and Performance data Health data Equal opportunities data	Doping case – 5 years from the expiry of sanctions. Eligibility case which is not doping – 5 years from the expiry of sanctions or where date decision is taken not to give sanction.
Research and analysis by the Sports Intelligence team to improve our understanding about potential talent within the UK and therefore performance (APA) gradings	Consent (which will be explicit for Special Category Personal Data)	Identity data (limited) Sport and Performance data	25 years post the athlete coming off the WCP
Assessment of Sickness, Injury or Incapacity Issues UK Sport and UKSI may share information about Athletes (and where relevant, continuation of their APA) if the Athlete is unable to participate fully in the WCP due to sickness, injury or other incapacity within UK Sport and	Explicit consent	Identity data Health data Sport and Performance data	Selected Athletes = 6 years after leaving WCP

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
organisations set out in Section E			
Decision making and administering grants to NGBs for the purposes of the World Class Programme.	Exercise of official authority	Identity data Contact data Sport and Performance data	6 years after leaving WCP or last application
Communicating information to Home Country Sports Institutes (HCSIs) • As the HCSI where the Athlete lives (England, Wales, Scotland or Northern Ireland) may also fund similar schemes run by therelevant governing body that may have a connection with, or impact on the WCP and may involve the Athlete or the governing body receiving National Lottery funds from them directly we may share Athlete data with them. • We will also share data so that HCSIs can offer sport science and sports medicine treatments within their locality	Exercise of official authority	Identity data Contact data Sport and Performance data	N/A

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Providing information to the British Athletes Commission ("BAC")	Exercise of official authority	Identity data Contact data Sport and Performance data	N/A
Providing information to SportsAid	Exercise of official authority	Identity data Contact data	N/A
Promoting Drug-Free Sport • Ensuring compliance with the terms and conditions of the APA • Implementing the UK's National Anti-Doping Policy • Responding to queries from UK Anti-Doping, the Athlete's HCSI.	Exercise of official authority Contract Substantial Public Interest Legal obligation and compliance with the National Anti-Doping Policy.	Identity data Contact data Sport and Performance data Health data	6 years after leaving the WCP (unless eligibility case, as above)
Betting, Gambling and Corruption We will at any time share information about you with your governing body, International Federation, the Gambling Commission, the Police relating to suspected criminal and/or sporting offences involving sports betting, gambling and corruption.	Exercise of official authority Substantial public interest UK Sport will process Athlete data (including special category Athlete data) in this way where required to do so by law.	Identity data Contact data	6 years after leaving the WCP (unless eligibility case, as above)

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
UKSI Services (including PDMS)	Consent	Identity data Health data Contact data Sport and Performance data	25 years from when leave the WCP
Learning and Development To comply with the Whyte Review, UK Sport and UKSI collect data to support athlete development through mandatory and optional e-learning modules on safeguarding, and high- performance ethics, ensuring compliance and tracking participation.	Public task Consent (which shall be explicit for any Special Category Personal Data)	Identity data Contact data	2 years after leaving WCP

PART C. ATHLETES RECEIVING AN ATHLETE PERFORMANCE AWARD OR OTHER GRANT

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Administering APA & Performance Development Award ('PDA') Grants and other grants to athletes.	Contract with Athlete Exercise of official authority	Identity data Contact data Sport and Performance data Finance data	6 years after leaving the WCP
Making Payments to Athletes	Contract with athlete	Identity data Contact data Finance data	6 years after leaving the WCP

Prevention of Fraud In order to assist relevant authorities to prevent and detect fraud	Exercise of official authority Public interest Legal obligation	Dependent on request	N/A unless fraud investigation, in which 12 years
Equal Opportunities Monitoring	Explicit consent	Equal Opportunities data	N/A as anonymised for reporting purposes

PART D. ADDITIONAL PROCESSING

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Providing Information and marketing (including to notify me on talent transfer of elite training opportunities) We may use information about you to provide you with marketing from UK Sport and other marketing that may relate to Athletes being on the WCP.	Consent	Identity data Contact data	Until opt-out or unsubscribe from marketing materials
Perform Athlete Survey for the Culture Health Check and other research • send surveys to Athletes to participate in Culture Health Check and other research undertaken by UK Sport and/or UKSI; and • analyse the results, which will be used to: o provide the information to NGBs; o complete research projects; and o use the data to monitor UK Sport and UKSI own performance or the performance	Exercise of official authority Where special category data is processed the condition would be where the processing is necessary for archiving purposesin the public interest, scientific or historical research purposes or statistical purposes	Identity data Contact data Sport and Performance data	3 years post AHC

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
of our investments;			
Recording Volunteering Appearances UK Sport operates a web portal ('Athlete Zone') on which athletes and NGBs enter details of athlete volunteering appearances (AVAs) that have been completed and reported by UK Sport to DCMS.	Contract Exercise of official authority	Identity data	6 years after leaving WCP
Responding to the Department for Digital, Culture, Media and Sport (DCMS) or MPs for the purposes of marketing and/or events only e.g DCMS or MPs may wish to congratulate Athletes in certain constituencies or invite them to certain events.	Consent	Identity data Contact data Sport and Performance data	N/A
To provide information about the Athlete Futures Network and related events/opportunities • to provide Athletes with newsletters, career and	Consent	Identity data Contact data	Until opt-out or unsubscribe from marketing materials

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
networking events, knowledge sharing sessions and sporting events; • to connect Athletes which are or have been on the WCP.			

PART E. THE ATHLETE MEDICAL SCHEME

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Administering the UK Sport Athlete Medical Scheme • Sharing data with BOA to enrol Athletes onto the medical scheme so that our provider may provide services under the scheme; • reviewing which Athletes have open claims (asthey need to remain on the AMS member list if leaving WCP); • Planning ahead and budgeting forthe medical scheme.	Contract	Identity data Contact data Sport and Performance data Health data	6 years after leaving the WCP, deselection or leaving the sport

PART F. PARENTS/GUARDIANS OF ATHLETES AND ADULTS AT RISK

Purpose for which it is used	Legal basis for use of data.	Categories of Data	Retention
Managing relationships with Athletes under the age of 18, an Adult at Risk or lacks the legal capacity to make their own decisions. For example administration of the talent identification process.	Consent (which shall be explicit where Special Category Data is process).	Identity data Contact data	Record of consent kept for 8 years after Athlete leaves WCP
To make grants where the Athlete is under 18, an Adult at Risk or lacks the capacity to make their own decisions.		Identity data Contact data Finance data	Record of consent kept for 6 years after Athlete leaves WCP

Appendix 2 - Further Information on our Personal Data Practices

UK Sportand UKSI 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 UKSI will also ensure there are mechanisms to monitor and audit partners' compliance with this protocol and Data Protection Laws.

1. Where is data stored?

Personal data on existing and former Athletes and staff is held securely on UK Sport and UKSI 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 internal systems that UK Sport uses are the:

- Grant Management System - to manage Athletes on the WCP and, if applicable, their Athlete Performance Awards
- 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.
- Where the Sport uses UKSI services, UKSI holds athlete medical records on its secure system, PDMS, and 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.

2. Useful links

- UK Sport Royal Charter
- UK Sport website
- UKSI website