



Support Through Sport CIO

POLICIES & PROCEDURES

Data Protection

Last Review Date: 17/11/2025 | Next Review Date: 17/11/2026

Support Through Sport CIO is a Charitable Incorporated Organisation registered in England and Wales under charity number 1212065. Registered office: 63–67 St Peter's Street, Nottingham, Nottinghamshire, NG7 3EN.



1. Overview

Support Through Sport respects the privacy of all individuals and takes very seriously its responsibilities under the General Data Protection Act 2018 (“GDPR”).

This policy is designed to ensure that all information held on individuals is properly handled in all cases. The GDPR requires that the “personal data” of living individuals that is kept by Support Through Sport on computer or well-structured paper files must be “processed” in accordance with eight principles (which are described in Appendix 1).

- Personal data is defined very widely and is any data from which a living individual can be identified either from the information alone, or with other information which is in (or likely to come into) the possession of Support Through Sport.

Examples of personal data include names, addresses, photographs, CCTV images of individuals, salary/job titles or opinions which allow individuals to be identified.

Personal data also includes “sensitive personal data” – this is information about an individual’s racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, trade union membership, physical or mental health or condition, sexual life or criminal offences/proceedings.

- “Individuals” could be any living person – for example, employees, agency staff, volunteers and job applicants.
- “Processing” includes obtaining, recording, holding, using, disclosing or erasing the personal data. In effect almost any activity involving personal data will fall within the scope of the GDPR.

Support Through Sport’s policy is to comply with the GDPR and it does not condone anyone processing personal data inappropriately on its behalf.

Any breach by Support Through Sport of the GDPR may lead to fines and/or enforcement action being taken against Support Through Sport by the Information Commissioner (the body that enforces compliance with the GDPR). Of equal concern is that any breach may attract media scrutiny and may lead to a potentially adverse impact on our reputation.

This policy applies to Support Through Sport and all staff working within (including employees, agency workers, contractors and temporary staff) who may process personal data about employees or other individuals. Compliance with this policy is mandatory.

The Senior Leadership Team has the responsibility for establishing and implementing effective practices and procedures across it to give effect to this policy.

2. Requirements

Support Through Sport must appoint a Data Protection Officer (“DPO”) (Tranai Todd) whose role is to ensure compliance by their operating company with the DPA, this policy and any relevant operating company procedures and practices. Specific responsibilities include assessing the current knowledge of data protection within the operating company, ensuring that appropriate training on data protection is provided to staff as required and managing any data security breaches (such as the loss of a laptop or memory stick with personal data stored on it).

A process must be established so that any data security breach (such as a loss of personal data) is immediately reported to the DPO and all staff must co-operate with the DPO in the investigation and management of that breach.

Support Through Sport must satisfy itself that any third party that it appoints to process personal data on its behalf understands its responsibilities under the GDPR. Support Through Sport should enter into a written contract with that third party that requires the third party to act only on instructions and to comply with obligations equivalent to those imposed on the operating company relating to security of the personal data.

Personal data must be processed in accordance with the eight principles set out in the GDPR, and the practices and procedures of Support Through Sport.

Our reputation and our ongoing relationships with our employees and customers are some of our most valuable assets.

By adhering in our daily business work to this policy we will all contribute to maintaining Support Through Sport's good name and its good relationships with its partners and other stakeholders. If you have any questions about this policy or need further assistance on data protection matters, please ask the Senior Leadership Team.

Although not mandatory email disclaimers can be very useful in ensuring your business complies with data protection rules. One of the primary purposes of the GDPR is to ensure that companies have tight control over personal information. Email disclaimers seek to prevent information leakage within business emails and marketing.

3. Email Communications

Support Through Sport request that anyone receiving an email from Support Through Sport complies with the email disclaimer as below:

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This e-mail and any attachments are confidential and intended solely for the addressee, they may also be privileged or exempt from disclosure under applicable law. If you are not the addressee, or have received this e-mail in error, please notify the sender immediately, delete it from your system and do not copy, disclose or otherwise act upon any part of this e-mail or its attachments. Internet communications are not guaranteed to be secure or virus-free. Support Through Sport CIO does not accept responsibility for any loss arising from unauthorised access to, or interference with, any Internet communications by any third party, or from the transmission of any viruses. Replies to this e-mail may be monitored by Support Through Sport CIO for operational purposes. Any opinion or other information in this e-mail or its attachments that does not relate to the business of Support Through Sport CIO is personal to the sender and is not given or endorsed by Support Through Sport CIO.

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4. Personal Data

Personal data must be processed fairly and lawfully. Support Through Sport must;

- only use information in a way that individuals would reasonably expect; and
- ensure individuals are made aware of, in a "privacy notice" that Support Through Sport will be processing the personal data, the purposes for which it is processed and any other additional information necessary to ensure that the processing is fair in the circumstances.

Privacy notices do not have to be actively communicated each time personal data of the individual is processed, provided that the individual has been made aware of the privacy notice, that he or she has the right to see it if he/she wishes and where to find it/who to contact for a copy. Privacy notices could be written (eg: in job application forms, employment contracts or privacy policy) or electronic (eg: published on a website).

For processing to be fair and lawful, the GDPR requires that one of the following conditions must also be met:

- (i) The individual consents to the processing; or (ii)
The processing is necessary:

- to enter into or perform a contract with the individual;
- to comply with a legal obligation of the operating company (other than a contractual one); or • for the legitimate interests of the operating company or a third party to whom the data is disclosed.

Although not mandatory email disclaimers can be very useful in ensuring your business complies with data protection rules. One of the primary purposes of the GDPR is to ensure that companies have tight control over personal information. Email disclaimers seek to prevent information leakage within business emails and marketing.

5. Appendix 1

Particular care should be taken with sensitive personal data and any processing of it should first be discussed with the DPO as it is likely to be necessary to first obtain the express consent of the individual to that processing.

Personal data must be obtained and processed only for a lawful purpose and must not be further processed in a manner which is incompatible with that process.

Personal data should only be collected if it is really needed. Duplicate files of the same personal should not be kept where possible.

Support Through Sport conducts regular reviews to see if personal data held is still accurate.

Support Through Sport conducts regular reviews of the personal data held and safely delete/dispose of outdated data.

Support Through Sport responds to requests by individuals for details of the individual's personal data held by the operating company (known as "data subject access requests") within the time period set out in the GDPR.

Support Through Sport will use measures such as password protection or encryption or restricting access to personal data to those who have a legitimate need to know.

Personal data held must be relevant and not excessive given the purpose for which it is processed. Personal data should only be collected if it is really needed.

Personal data held must be accurate and kept up to date. This should be checked regularly.

Personal data processed for a specific purpose must not be kept for longer than is necessary. This should be checked regularly.

Personal data must be processed in accordance with the rights of the individual.

Support Through Sport should respond to requests by individuals for details of the individual's personal data held by the operating company (known as "data access requests") within the time set out in the GDPR.

Appropriate measures must be taken to prevent unauthorised or unlawful processing, loss or damage to personal data.

Each UK operating company should consider using measures such as password protection or encryption or restricting access to personal data to those who have a legitimate need to know.

Personal data must not be transferred outside the EEA unless the destination country has adequate protection.

Special care must be taken to ensure that transfers to our joint venture partners are permitted under the GDPR – there is no automatic right under the GDPR for such transfer.

Support Through Sport is also registered with the Information Commissioner's Office under registration number ZB721481. More information can be found online at ico.org.uk.

6. Review

Support Through Sport are committed to reviewing this policy annually. Support Through Sport's Data Protection policy is fully supported by the Senior Leadership Team. This policy will be reviewed annually.

Signed as reviewed (date on cover page) Tranai Todd - Chief Executive Officer


