

Ref: FOI-487

[REDACTED]  
Sent via email only:  
[REDACTED]

20 May 2025

Dear [REDACTED]

1. Thank you for your email of 23 April 2025 in which you requested information from UK Anti-Doping ('UKAD') under the Freedom of Information Act 2000 ('the Act'). Specifically, your request was as follows:

*Under the Freedom of Information Act 2000, please provide the following information about your procurement of any*  
*(i) external Data Protection Officer (DPO),*  
*(ii) Data protection GDPR compliance services for the period FY2022-23 to FY2024-25:*

*1. Current DPO arrangements*

*1.1 Is the organisation's DPO and other staff that work on data protection compliance:*

- (a) An internal employee*
- (b) A DPO provided by an external service provider*
- (c) Hybrid (internal staff with external service provider support)*

*1.2 Where services are provided by external providers, please share the following information:*

- (a) The Company name(s)*
- (b) Annual spend by your organisation (FY2022/2023 through to FY2024/2025)*
- (c) The highest day rate paid*
- (d) Contract dates (start/end/renewal terms)*
- (e) A brief description of the project or services provided (for instance, project title or internal reference)*
- (f) Services covered (e.g., audits, breach management, SAR management, delivery of DPIAs) • Please indicate what deliverables were produced • Procurement method (e.g., open competition, framework agreement, direct award) and name of the procurement framework, if applicable.*

## *2. Consultancy Spend*

*2.1 What is the organisation's, total annual expenditure on data protection/GDPR consultancy services?*

*2.2 For SoW/projects which have a spend of more than £5k), please share the following information:*

- Supplier company name*
- The scope of the Project (e.g., &quot;ICO investigation support&quot;[sic] ;, DPIA support, Internal Audit recommendation support)*
- Spend*
- Procurement method*

## *3. Data Protection Compliance staffing*

*3.1 The Number of in-house data protection staff in the organisation? (FTE)*

*3.2 Are there any vacant roles? (Yes/No)*

*3.3 Where there any ICO investigations, audits, or enforcement actions for the period from FY2022/2023 to FY 2024/2025?*

## *4. Future Plans*

*4.1 Is your organisation planning to put out to tender for any DPO/GDPR services in the current financial year?*

*4.2 If yes please provide the following:*

*Expected timeline*

*Budget range*

*Key service requirements*

*Procurement method*

## **Summary of Response**

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2. UKAD confirms that, subject to the explanations provided below, it holds some of the information relevant to your request.
3. In relation to Part 1 of your request, UKAD confirms that it holds the requested information.
4. In relation to Part 2 of your request, UKAD does not hold the information requested.

5. In relation to Part 3 of your request, UKAD confirms that it holds some of the information requested. However, where that information is held, it is subject to an exemption under the Act and is therefore withheld.
6. In relation to Part 4 of your request, UKAD does not hold the information requested.

### **Part 1 of your request**

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7. UKAD confirms that it holds information relevant to Part 1 of your request. UKAD's designated Data Protection Officer is an internal employee.

### **Part 2 of your request**

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8. In relation to Part 2 of your request, UKAD can confirm that it does not use data consultancy services. Therefore, UKAD does not hold information relevant to Part 2 of your request.

### **Part 3 of your request**

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9. In relation to Part 3.1 of your request, UKAD does not employ any staff specifically in data protection roles. However, there are multiple members of staff within UKAD that assist with data protection matters and queries on an ad hoc basis, alongside other responsibilities more directly associated with their roles. Therefore, UKAD confirms that it does not hold information relevant to Part 3.1 of your request.
10. Section 21 of the Act states:

#### ***21 Information accessible to applicant by other means.***

*(1) Information which is reasonably accessible to the applicant otherwise than under section 1 is exempt information.*

*(2) For the purposes of subsection (1) —*

- a. *information may be reasonably accessible to the applicant even though it is accessible only on payment, and*
- b. *information is to be taken to be reasonably accessible to the applicant if it is information which the public authority or any other person is obliged by or under any enactment to communicate (otherwise than by making the information available for inspection) to members of the public on request, whether free of charge or on payment.*

11. In relation to Part 3.2 of your request, UKAD confirms that it holds information regarding vacant roles. However, this information is withheld under section 21 of the Act as it is reasonably accessible to you by other means. Details of staff vacancies at UKAD are listed on UKAD's Careers Hub, which can be found [here](#).
12. In relation to Part 3.3 of your request, UKAD confirms that it holds the information requested. However, this information is withheld under section 21 of the Act as it is reasonably accessible to you by other means. Details of any ICO investigations, audits or enforcement actions are published on the ICO website, which can be found [here](#).

#### **Part 4 of your request**

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13. UKAD does not have any plans to put out to tender for any DPO/GDPR services in the current financial year. Therefore, UKAD confirms that it does not hold information relevant to Part 4 of your request.

#### **Conclusion**

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

Yours sincerely

A handwritten signature in blue ink that reads "UK Anti-Doping".

**UK Anti-Doping**