

Headline 3.4 Internal communication and consultation

1. Definition

Internal communication is the exchange of information, messages and opinions between various actors within an organisation, as well as between an organisation and its direct member organisations. Different channels of internal communication can be used including email, collaboration/communication platforms, or other technological means which can facilitate the exchanges. Communication with members should be structured around web-based communication, regular events and meetings as well as personal exchanges. This communication should allow members to receive information from the organisation but also to share their own relevant activities.

Besides informing and facilitating communication, internal communication channels can also be used to consult staff members as well as member organisations. Internal communication can therefore contribute to balanced, informed and democratic decision-making. A smooth information flow within the organisation allows all components to make informed decisions and actions and to perform their tasks more efficiently, in line with other departments. Beyond technical means, the regular occurrence of information exchange is crucial.

Another important element of (internal) communication is the need to safeguard the confidentiality and the protection of data of all persons linked to the organisation and its members. In this regard, sound confidentiality, privacy and data protection regulations should be in place aligned with the relevant GDPR requirements. Sports organisations collecting and processing personal data, such as athlete information or medical records must comply with GDPR requirements to ensure the privacy and security of individuals' data. This becomes specifically relevant when considering confidential internal reporting mechanisms for any type of breach of the organisation's regulations.

Internal communication and consultation are closely linked to "Decision-making processes" (4.3), "Democratic process and elections" (4.2), "Availability of documents" (3.3) and "External communication" (3.5).

2. Ideal scenario

The organisation has implemented a comprehensive internal communication strategy to effectively engage with staff, athletes, board members, volunteers, and member organisations. This strategy integrates a variety of communication channels, including an interactive website, traditional events, personal contacts, regular staff meetings, and dedicated communication and collaboration platforms. These channels facilitate seamless remote collaboration and are essential for maintaining a continuous consultation process with members on topics and issues that impact the organisation and its stakeholders.

To ensure that the communication strategy remains effective and responsive to the dynamic environment, the organisation regularly assesses its communication methods. This ongoing evaluation helps to achieve the organisation's objectives and adapt to changing needs.

In addition to enhancing communication, the organisation is deeply committed to upholding data protection and confidentiality. It enforces strict confidentiality rules in line with national regulations and relevant standards across all communication platforms. This commitment extends to board members, staff, athletes, their entourages, and member organisations, ensuring the secure and ethical handling of sensitive data throughout the organization’s network. Special attention is given to maintaining accessible reporting mechanisms that minimize the risk of retaliation.

The organisation designates a responsible individual, potentially within the HR department, to oversee GDPR compliance and ensure adherence to data protection laws. Misconduct reporting is a critical component of this framework, with options to report to an ethics commission, a central reporting body within the organization, or an external ombudsman. The organisation guarantees that whistleblowers will not face any disadvantages for their reports, regardless of the outcome, unless the report was intentionally false. This protection encourages individuals to report any misconduct they encounter, reinforcing the organisation's commitment to integrity and accountability.

3. Risks

- Inability to spread internal information.
- Lack of ownership by members in the organisation’s activities.
- Lack of knowledge by members of the organisation’s activities.
- Waste of time and resources.
- Democratic deficit.
- Difficulties in implementing strategic decisions by the board.
- Decisions by the organisation that are not supported or that cannot be implemented by staff and/or members.
- Legal proceedings on breaches of confidentiality or data protection.
- Wrong perception of members’ expectations.

4. Instruments and key elements

<i>Instruments</i>	<i>Key elements</i>
Internal communication strategy	<ul style="list-style-type: none"> • General principles for internal communication. • Strategy regarding web presence and the various features of the website (including intranet space). • Regular personal exchanges (e.g. staff meeting – bilateral meeting with members). • Responsible person for internal communication (e.g. communication manager). • Timing of communication (e.g. publishing of agendas and consultation documents of events). • Availability of documents. • Link with the consultation process. • Link with confidentiality and data protection arrangements.
Consultation process/strategy	<ul style="list-style-type: none"> • Regular consultation of members. • Consultation on wide range of topics and issues of relevant to the organisation or affecting the member organisation.

	<ul style="list-style-type: none"> • Responsible person for consultation of members. • Timing of consultation. • Availability of documents (to ensure informed positioning by members). • Use of technological means for consultation. • Link with confidentiality arrangements.
Confidentiality / Privacy and Data Protection Policy	<ul style="list-style-type: none"> • Clear rules on confidentiality and privacy. • Clear rules on the protection of Personal Data and transfer of data within the organisation. • Contact person for questions regarding confidentiality, privacy or data protection. • Based on applicable national and international standards. • Linked with external communication strategy. • Reference on website for externals providing personal data.
Whistleblower:	<ul style="list-style-type: none"> • The whistleblower will not suffer any disadvantages because of the tip-off, regardless of whether the information ultimately proves to be true or not, unless there is an intentionally false accusation. • Any person who discovers misconduct is encouraged to report it. • For this it is important that the whistleblower is protected and does not suffer any personal disadvantages as a result of the report.

5. Good practice examples

Example “Privacy policy”

Organisation: International Olympic Committee (IOC)

Description: This Privacy Policy outlines how the International Olympic Committee (“IOC”) processes personal data within its digital activities, including but not limited to websites, mobile applications, connected TV applications, registration systems, digital marketing, online professional services, business resources, and various engagement and information services. These activities, managed either solely by the IOC or in collaboration with other members of the Olympic Movement, are collectively referred to as the “Services” in this Privacy Policy.

The policy further explains how the IOC processes personal data received from other organizations, as well as data collected via cookies and similar technologies integrated into third-party digital properties, for the benefit of the IOC.

Further information: [Privacy Policy | Olympics.com](#)

Example “Internal communication strategy”

Organisation: International Ski Federation (FIS)

Description: The International Ski Federation (FIS) has implemented a comprehensive internal and external communication strategy focused on cooperation and engagement with all stakeholders. This includes national ski associations, athletes, FIS Committee members, officials, Organising Committees, media, sponsors, suppliers, service providers, other sports organizations, and public authorities. The strategy emphasizes effective communication to convey messages and provide timely and informative updates within the organization. FIS utilizes various channels for internal communication, ensuring transparency and responsiveness in sharing information.

- Newsflash available to membership as well as via sign-up.
- Documents that are freely accessible on the FIS website.
- Specific member section for the national federations. In this member section, users can find the minutes of the General Assembly (“FIS Congress”), the Board (“FIS Council”) and commissions (“FIS Committees”)
- Press releases after each General Assembly and Board meeting listing key decisions A fully-fledged external communication strategy including the FIS website, social media and networking channels and a FIS App complement this internal strategy.

Further information: <https://www.fis-ski.com/en/inside-fis/organisation/promotion>

Example “Data Protection Policy”

Organisation: National Handball Federation of Ireland

Description: The Irish Handball Federation has adopted a very detailed Data Protection Policy. The document, which is publically available on their website, lists an overview of the applicable policy, its rules and provisions and provides more information on the policy as well as practical advice for clubs, players, coaches and other stakeholders.

In terms of the Data Protection Rules, the federation lists 7 main principles in line with the national Data Protection Act:

- Lawfulness, Fairness, Transparency
- Purpose Limitation
- Data Minimisation
- Accuracy
- Storage Limitation
- Integrity and Confidentiality
- Accountability

Further information:

[Policies & Safeguarding \(olympichandball.org\)](https://olympichandball.org/policies-safeguarding)

[Privacy & Data Protection \(olympichandball.org\)](https://olympichandball.org/privacy-data-protection)

Example “Data Protection Policy”

Organisation: Sport and Recreation Alliance UK

Description: The Sport and Recreation Alliance UK provide a highly detailed privacy policy, readily available for the public. It clearly states from the beginning that there is not one specific person for this role, but instead a team which oversees data protect compliance. Contact details are provided. Alongside the privacy policy are privacy notices, which provide specific details on how they manage data depending on type of type of information being received;

- [Member privacy notice](#)
- [Volunteer privacy notice](#)
- [Job applicant privacy notice](#)
- [Privacy notice for everyone else external to our organisation](#)

In addition, other topics of privacy and data protection such as basic security measures, online cookies, and even the rights of the individual concerned are explained.

Further information: <https://www.sportandrecreation.org.uk/pages/privacy>

Example “Data Protection Policy”

Organisation: World Triathlon

Description: World Triathlon has produced a comprehensive privacy policy, easily accessible on their website. Explanations on the type of data collected from visitors to registered users and media are available. In addition, the organisation published a World Triathlon Data Project which is a guide to respond and comply with the obligations that the GDPR brings to all organisations that process data of EU citizens. This guide provides templates to each section to respond easily and quickly to the requirements of the data subjects in use of their rights on several aspects:

- Request of the rights of the data subject,
- Right to erasure,
- Obligation of notification,
- Data breach of violation,
- Information to provide where the personal data have not been obtained from the data subject.

Further information:

[Microsoft Word - World Triathlon GDPR.docx](#)

[Microsoft Word - Personal Data Policy AA.docx
\(triathlon.org\)](#)

[World Triathlon](#)

Example “Data protection notice”

Organisation: FIBA

Description: The Fédération Internationale de Basketball (FIBA) and Basketball Australia (BA), including subsidiaries such as FWBWC 2022 Limited, are committed to protecting personal information. This Data Protection Notice explains how they collect, use, and safeguard Personal Data, which includes any information that can identify the person, such as the name or contact details. Personal Data is used

lawfully, either to fulfil contractual obligations, based on a given consent, or to pursue legitimate interests. Specifically, data may be used to provide information about the FIBA Women's Basketball World Cup 2022, manage the Competition, inform participants about our products and services, and improve offerings. FIBA and BA uphold strict data protection standards and will only share Personal Data with third parties if legally required or with given consent.

Further information: [Microsoft Word - FIBA Data protection Notice FINAL.docx](#)

Example "Appeal policy"

Organisation: International Union of Modern Pentathlon (UIPM)

Description: The UIPM Court of Arbitration's composition, competences, and proceedings are detailed in the UIPM Code of Ethics.

The UIPM disciplinary procedure involves the Executive Board appointing an independent Disciplinary Panel to handle cases, with appeals against its decisions directed to the UIPM Court of Arbitration. Members can nominate arbitrators for the eligible list, and the Court has jurisdiction over disputes involving UIPM and its members, including appeals against Disciplinary Panel and executive board decisions. Appeals require permission and must be lodged within 21 days, detailing the decision's errors. The Court considers appeals based on issue viability, fresh evidence, and other factors, issuing decisions within 14 days. Costs of proceedings are determined by the Court, with initial fees applicable. Further appeals can be made to the Court of Arbitration for Sport (CAS) in Lausanne.

If UIPM delays a decision on an anti-doping rule violation, WADA can appeal directly to CAS.

Further information:

[UIPM 2021 Code of Ethics](#)

[UIPM 2023 Rules of international organisation](#)

Example "Privacy policy"

Organisation: United World Wrestling (UWW)

Description: The privacy policy explains how the UWW and some of the companies it works with collect, use, disclose, share, store, dispose of and protect information relating to customers' use of the website and platform. This policy also states customers' privacy rights and how the law protects them.

UWW's cookie policy explains how UWW and some of the companies it works with use cookies on their websites and platforms and how users can deactivate them.

Further information:

[UWW Privacy policy](#)

[UWW Cookie policy](#)

[UWW Terms and Conditions](#)

Example “Data protection policy”

Organisation: World Baseball Softball Confederation (WBSC)

Description: Data protection/ IT Security

The WBSC Data Protection Policy is issued in accordance with the International Standard for the Protection of Privacy and Personal Information (ISPPPI) as set forth by the World Anti-Doping Agency (WADA). This Policy outlines the WBSC’s main obligations and commitments towards the protection of personal data relating to anti-doping activities, including the collection, processing, and disclosure of personal information in connection with anti-doping activities. The following principles guide the WBSC’s collection, processing, and disclosure of personal data in relation to anti-doping activities:

- **Lawfulness, Fairness & Transparency:** the WBSC shall ensure that personal data is collected, processed, and disclosed in a lawful, fair, and transparent manner.
- **Purpose Limitation:** personal data shall only be collected, processed, and disclosed for specific and legitimate purposes related to anti-doping activities authorized under the World Anti-Doping Code and International Standard, provided such processing activities do not conflict with applicable privacy and data protection laws.
- **Necessity & Proportionality:** the WBSC shall ensure that personal data is processed only where necessary and proportionate.
- **Data Minimisation:** the WBSC shall collect, process, and disclose only the minimum amount of personal data necessary for the purposes of anti-doping activities.
- **Accuracy:** the WBSC shall take reasonable steps to ensure that personal data is accurate and up to date.
- **Storage Limitation:** the WBSC shall retain personal data for no longer than necessary for the purposes of anti-doping activities.
- **Integrity & Confidentiality:** the WBSC shall ensure that personal data is kept secure and confidential.
- **Accountability:** the WBSC shall take responsibility for ensuring compliance with this Policy and all applicable data protection laws and regulation

Further information:

[WBSC Privacy Policy](#),

[WBSC Anti-doping Privacy Notice](#),

[WBSC Anti-doping Data protection policy](#)

6. Steps to the next level

To level 2 ★★ “Emerging”	To level 3 ★★★ “Developing”	To level 4 ★★★★ “Established”	To level 5 ★★★★★ “Embedded”
<ul style="list-style-type: none"> Discuss the internal communication of your organisation towards your staff and members in a Board meeting. Explore ways to enhance this communication for improvement. Consider possible ways to consult your member organisations on relevant issues (e.g. at the General Assembly). 	<ul style="list-style-type: none"> Evaluate internal communication towards members, assessing the potential use of your website and other technological platforms to facilitate it. Ensure that all members have the contact details of all personnel/staff within your organisation. Use your General Assembly as an annual opportunity for formal and informal consultation with members. Consider additional possibilities for consultation are feasible. Maintain updated email lists of representatives from member organisations. Consider internal reporting mechanisms and ensure compliance with 	<ul style="list-style-type: none"> Use and adapt your website as a source of information for your members and consider using e-mail alerts as communication directly to your members. Publish a directory/organigram of your organisation and update this directory regularly. Provide contact details for each department and staff member. Consult members regularly on key issues and leverage technological tools like online surveys and feedback forms to facilitate the process. Maintain updated email lists for direct consultation on specific topics. Establish an internal reporting mechanism for any type of breach of the organisation’s regulations. Define clear provisions and rules on confidentiality, 	<ul style="list-style-type: none"> Enhance your website, share important ad-hoc information via e-mail alerts or other text message services and facilitate direct contact with relevant staff members and representatives. Institute a regular formal consultation process covering various relevant issues and topics for the organisation and its stakeholders. Ensure regular member consultation with defined procedures for timing and feedback incorporation into decision-making. Have a clearly established, easily accessible internal reporting mechanism that minimises the risk of retaliation. Ensure robust protections are in place to safeguard whistleblowers from any form of retaliation or



	<p>confidentiality, privacy, and data protection regulations.</p>	<p>privacy, and data protection in line with national and international standards. Ensure that all staff members and member organisations are aware of these rules.</p>	<p>personal disadvantage resulting from their report, including clear policies, confidentiality measures, and support mechanisms.</p> <ul style="list-style-type: none"> Implement a robust fully-fledged confidentiality/privacy/data protection policy covering all staff members and member organisations. Ensure compliance of these rules with applicable national and international standards. Publish this policy and ensure that all members know its existence and provisions. Provide a direct contact person for dealing with enquiries/concerns related to this policy.
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