

# Applying the SAFE principles framework to the sport and physical activity sector



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### About the Sport and Physical Activity Workforce Observatory

The workforce observatory is the gateway to shaping the future of the sport and physical activity sector; through data-driven insights, bridging theory and practice, and fostering meaningful collaboration between academia and the sector.

**S+PA  
Workforce  
Observatory**

The observatory provides access to the latest real-world data and cutting-edge research into the UK sport and physical activity workforce; helping to develop curriculums; future-proof organisations; inform policy development; support workforce management, development, and planning; and foster new research collaborations and interdisciplinary studies.

[Find out more about the observatory here.](#)

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## Introduction

As the custodian of workforce data and intelligence in the UK sport and physical activity sector the S+PA Workforce Observatory, supported by CIMSPA, is committed to using data in a way that is secure, ethical, and impactful.

The Board will work with CIMSPA to establish a Trusted Research Environment (TRE) – a framework that collects, stores and promotes public access to key data dashboards or raw data for research and analysis. It is anticipated that some data sources will be sensitive and require restricted access, data use agreements, and pre-approval of research projects.

Developing a secure national S&PA Trusted Research Environment for workforce planning data will support the highest data governance and security standards to undertake ethical research that supports effective decision making in our sector.

This document presents the SAFE principles framework which the Board has agreed are essential to guide overall management and governance of this specialist TRE ensuring that we handle sensitive information with the highest standards of integrity and transparency.

This policy sets out a clear, structured approach to data access and governance - making sure that only the right people use data for the right projects, in the right settings, with the right protections in place.

By adopting the SAFE principle, we strengthen trust in our work, uphold public confidence, and empower researchers, policymakers, and partners to use our data confidently and responsibly. Ultimately, this framework enables us to deliver insights that drive better decisions for the sector in a collaborative way that will drive efficiencies, save time and reduce costs - without compromising privacy or ethics.

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## Background

As the Sport and Physical Activity Workforce Observatory seeks to establish safe principles around the workforce data and accessibility, the Standard Architecture for Trusted Research Environment (SATRE) framework has been identified as the benchmark of best practice within the UK. This framework is employed by the Office of National Statistics as well as other [trusted research environments](#) (TREs) to ensure that data is being accessed and interrogated safely, responsibly and effectively.

By emulating and adapting this framework for use within sport and physical activity workforce research, we can be confident that our principles will protect the use of data, support researchers and maximise the impact of the data.

Further information on SATRE [can be found here](#).

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## Introduction to the 5 SAFE Framework

The main principles for a TRE include the 5 SAFE principles. The 5 SAFE Framework is a robust methodology designed to ensure the secure, ethical, and effective use of sensitive data in research and analysis. Originating from the health data sector and advocated by SATRE, it is increasingly being adapted to other fields where safeguarding sensitive information and maintaining public trust are paramount.

### The framework comprises:

#### **SAFE People**

Ensuring access to data is restricted to trained, authorised individuals.

#### **SAFE Projects**

Ensuring data is only used for ethical, approved purposes that align with the public or organisational benefit.

#### **SAFE Settings**

Providing secure environments where data can be accessed and analysed without risk of breaches.

#### **SAFE Data**

Ensuring data is appropriately anonymised or de-identified to protect individual privacy.

#### **SAFE Outputs**

Ensuring data results or outputs meet strict criteria to prevent inadvertent disclosure of sensitive information.

For the Sport and Physical Activity Workforce Observatory, led by CIMSPA (Chartered Institute for the Management of Sport and Physical Activity), implementing the SAFE framework, particularly SAFE People, will be critical to achieving its objectives of gathering, analysing, and reporting on workforce trends while maintaining trust among stakeholders.

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## The framework in detail

### SAFE Data: tier 1 – aggregated industry trends (public):

Data is aggregated to reflect broad industry trends, thereby minimising the risk of individual disclosure. Sources can be accessed and cited from the data dashboards.

<b>SAFE People</b>	<b>General enquiries plus provisional accredited researchers</b> Entry-level users (students, early career researchers, or industry professionals beginning research activities). No formal degree is required
<b>SAFE Projects</b>	Projects typically focus on broad, descriptive analyses that inform public policy or sector-wide trends. They are subject to an open access project approval process with no ethical oversight and minimal data minimisation requirements. Data sources can be cited in student or academic studies and industry reports.
<b>SAFE Settings</b>	Minimal restrictions due to the low sensitivity of aggregated data. Secure environments are standard platforms with basic encryption and monitoring—sufficient for managing low-risk, aggregated data while preventing unauthorized modifications.
<b>SAFE Outputs</b>	Outputs are intended for public dissemination (e.g., public dashboards or summary reports) and undergo basic disclosure checks (e.g., minimum cell count rules) to ensure that no individual details are revealed.



## SAFE Data: tier 2 – de-identified workforce insights (restricted):

Data has been anonymised and deidentified, allowing for more detailed analysis while safeguarding individual privacy.

<b>SAFE People</b>	<p><b>Provisional Accredited Researchers</b></p> <p>These can be entry-level users (students, early career researchers, or industry professionals beginning research activities) under the supervision of Accredited Researchers Level 1 or above.</p> <p><b>Accredited Researchers Level 1</b></p> <p>These typically hold an undergraduate degree or equivalent industry experience. They must complete mandatory data protection and ethics training and demonstrate relevant research output.</p>
<b>SAFE Projects</b>	<p>Projects utilising tier 2 data focus on targeted, in depth analysis. They require a clear, ethically approved research purpose, demonstration of proportionality and data minimisation, and are reviewed by an ethical board to confirm alignment with public or organisational benefit.</p> <p>Outputs must pass automated disclosure control measures—ethical approval codes and threshold checks—and undergo independent review to ensure no risk of re identification prior to release..</p>
<b>SAFE Settings</b>	<p>Access is controlled via role based protocols; users must adhere to accredited training, data use agreements, and ethical guidelines ensuring that only necessary data is accessed.</p> <p>Secure environments are established as dedicated trusted research environments (TREs) featuring role based access, multi-factor authentication, continuous monitoring, and strict controls on data processing and export.</p>
<b>SAFE Outputs</b>	<p>Outputs are intended for public dissemination (e.g., public dashboards or summary reports) and undergo basic disclosure checks (e.g., minimum cell count rules) to ensure that no individual details are revealed.</p>

## SAFE Data: tier 3 – raw pseudonymised data (highly restricted):

Granular, raw data that has been [pseudonymised](#) retains a high level of detail and, if mismanaged, presents significant reidentification risks.

<b>SAFE People</b>	<b>Senior Accredited Researcher / Chartered Researcher Level 3 / Senior Chartered Researcher</b>  These senior-level roles require advanced clearance and extensive research leadership experience, often demonstrated through postgraduate qualifications or equivalent expertise and a proven track record in handling sensitive data.
<b>SAFE Projects</b>	Projects requiring Tier 3 data involve advanced research that necessitates granular insights. They must be supported by explicit, robust justification and undergo a stringent project approval process with heightened ethical scrutiny and accountability to ensure that the benefits justify the risks while adhering strictly to data minimisation principle
<b>SAFE Settings</b>	Strict access protocols are enforced, including enhanced security training, comprehensive audit trails, and additional legal agreements. Access is strictly limited to projects with a demonstrable need for highly detailed data. Environments for Tier 3 data are highly secure, featuring restricted access, robust encryption, no local downloads or external transfers, continuous security reviews, and advanced monitoring to ensure the utmost protection of sensitive information.
<b>SAFE Outputs</b>	Outputs from Tier 3 data must undergo both automated and manual disclosure controls, with comprehensive <a href="#">Statistical Disclosure Control</a> (SDC) checks and a tiered approval process—often resulting in outputs being aggregated further to prevent re identification.

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## SAFE People

SAFE People address the “who” of data access, ensuring that only appropriate, trained, and authorised individuals can handle sensitive workforce data. In the context of the Observatory, this principle ensures that data related to sport and physical activity professionals is managed securely, ethically, and in alignment with GDPR and other legal requirements.

### Key considerations for SAFE People in the Observatory:

#### Access restrictions:

- Limit access to data only to individuals with verified credentials.
- Establish a [role-based access control](#) (RBAC) system ensuring that users only access the data necessary for their specific responsibilities.

#### Accreditation and training:

- Require individuals accessing the Observatory’s workforce data to undergo mandatory training on data protection, ethics, and information security.
- Adopt a standardised accreditation scheme like the ONS Approved Researcher Scheme, ensuring consistency in eligibility criteria.

#### Transparency and accountability:

- Maintain a transparent record of who has access to data and their purposes, aligning with public trust objectives.
- Ensure all data agreements explicitly cover compliance obligations and security incident reporting.
- Implement a legal agreement framework for all individuals and organisations accessing the data. Agreements should include clauses on:
  - Not attempting to re-identify anonymised data.
  - Reporting any security incidents immediately.
  - Acknowledging penalties for non-compliance.

#### Broad inclusivity for non-traditional researchers:

- Open data access to diverse stakeholders, including private organisations, non-profits, and independent researchers, while ensuring they meet all training and accountability standards. This will enhance the breadth of research in the workforce sector without compromising security.

#### Identity verification:

- Use [multi-factor authentication](#) (MFA) and institutional logins to verify identities.
- Partner with CIMSPA and other accrediting bodies to vouch for the credentials of individuals and organisations accessing data.



## SAFE People: Implementation for the Observatory

- **Onboarding system:** Develop an onboarding system that ensures all researchers and analysts meet the SAFE People standards. This could include a portal for training certification, identity verification, and legal agreements.
- **Audit and monitoring:** Set up audit trails to track access and ensure compliance with SAFE People requirements, providing regular reports to stakeholders.
- **Stakeholder engagement:** Build trust by engaging workforce professionals, researchers, and the public through transparent communication about who is accessing the data and for what purposes.

### SAFE People – researcher accreditation

This accreditation framework for the Observatory not only provides clarity and structure for researchers in access levels to sensitive information but a framework for how researchers within sport and physical activity can gain professional status with access to CIMSPA membership.

The starting point for developing this has been the Vitae Research Development framework but we're mindful that the framework should be accessible to industry and academic researchers alike. More information on the complete framework [can be explored here](#).

## Researcher accreditation table

Researcher	Level	Eligibility	Requirements
<b>Provisional Accredited Researcher</b>	Entry level	<ul style="list-style-type: none"> <li>Open to students, early career researchers, or industry professionals beginning research activities.</li> <li>No formal degree requirement: relevant industry experience or an equivalent research role is acceptable.</li> </ul>	<ul style="list-style-type: none"> <li>Completion of foundational research methods and data protection training.</li> <li>Demonstrates basic research skills through coursework, small-scale projects, or industry related research.</li> <li>May contribute to non-peer-reviewed outputs.</li> <li>No requirement for prior published research.</li> </ul>
<b>Accredited Researcher</b>	Level 1	<ul style="list-style-type: none"> <li>Holds an undergraduate degree or equivalent industry experience in research roles.</li> <li>Completed mandatory data protection and ethics training.</li> </ul>	<ul style="list-style-type: none"> <li>Evidence of conducting one piece of published or industry-reviewed research relevant to S+PA workforce in the past three years.</li> <li>Demonstrates ability to manage research projects, analyse data, and communicate findings effectively.</li> <li>Engages in collaborative research activities and applies for small-scale funding.</li> </ul>
<b>Senior Accredited Researcher</b>	Level 2	<ul style="list-style-type: none"> <li>Holds a postgraduate qualification or has significant research leadership experience.</li> <li>Demonstrates research leadership in applied settings.</li> </ul>	<ul style="list-style-type: none"> <li>Leads research projects and critically evaluates findings.</li> <li>Mentors junior researchers and contributes to sector policy recommendations.</li> <li>Holds multiple peer-reviewed publications or equivalent industry contributions.</li> <li>Successfully manages research funding.</li> </ul>
<b>Chartered Researcher</b>	Level 3	<ul style="list-style-type: none"> <li>Holds a relevant postgraduate qualification or demonstrates equivalent professional experience.</li> <li>Recognised for advancing methodologies and innovative research.</li> </ul>	<ul style="list-style-type: none"> <li>Leads major research initiatives influencing industry practices.</li> <li>Holds a strong publication record, including white papers, technical reports and policy briefings.</li> <li>Plays a leadership role in securing significant research grants.</li> </ul>
<b>Senior Chartered Researcher</b>	Level 4	<ul style="list-style-type: none"> <li>Holds a senior research leadership position.</li> <li>Demonstrates significant contributions to the field through policy development and advocacy.</li> </ul>	<ul style="list-style-type: none"> <li>Shapes national or international research agendas.</li> <li>Holds a distinguished record in high-impact journals, industry reports, and governmental advisory roles.</li> <li>Secures substantial funding and leads multi-disciplinary research programs.</li> </ul>

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## SAFE Projects

SAFE Projects ensures that data is only used for well-defined, ethical, and approved purposes that align with public or organisational benefit. For the Sport and Physical Activity Workforce Observatory, this principle ensures that research and analysis contribute meaningfully to workforce development, policy improvements, and sector-wide innovation while maintaining trust and compliance with data governance laws.

### Key considerations for SAFE Projects

#### Project approval and justification

- Every data access request must be tied to a clearly defined research or analysis project.
- Projects should demonstrate tangible benefits for the sport and physical activity sector, such as workforce planning, diversity and inclusion studies, or policy recommendations.
- Establish a project approval process through a Data Governance Committee to ensure alignment with the Observatory's mission.

#### Ethical oversight and public interest

- Ensure that all projects adhere to ethical guidelines, including GDPR compliance and principles of public benefit.
- Involve workforce representatives, policymakers, and researchers in project evaluations to maintain transparency.
- Implement a public data use register, listing approved projects and their objectives.

#### Proportionality and data minimisation

- Access should be granted only to the specific data required for the approved project, following the principle of data minimisation.
- Different tiers of access should be established (e.g., aggregated data for general insights, restricted access for workforce-level analysis).

#### Accountability and compliance

- Researchers and analysts must sign data use agreements, committing to responsible data handling and ethical reporting.
- Introduce a data stewardship program to monitor project progress and adherence to approved objectives.

## SAFE Projects: Implementation for the Observatory

- Develop a structured project application process ensuring all research aligns with the Observatory's goals.
- Establish an [ethical review board](#) to assess the risks and benefits of data use.
- Create automated tracking systems to monitor project activities and data interactions.

## SAFE Data

SAFE Data ensures that information used within the Observatory is appropriately anonymised, de-identified, and structured to prevent unauthorised identification of individuals while maintaining research value. For the Observatory, this principle protects workforce professionals' privacy while enabling meaningful workforce analysis.

### Key considerations for SAFE Data

#### Data anonymisation and pseudonymisation

- Convert personally identifiable information (PII) into non-identifiable formats before analysis.
- Use pseudonymisation techniques where necessary to enable data linking without exposing identities.

#### Data minimisation and sensitivity levels

- Classify data into sensitivity tiers:
  - **Tier 1:** Aggregated industry trends (public).
  - **Tier 2:** De-identified workforce insights (restricted).
  - **Tier 3:** Raw pseudonymised data (highly restricted).
- Apply differential privacy methods to prevent re-identification risks.

#### Data quality and standardisation

- Ensure consistent formatting and metadata documentation for workforce datasets.
- Implement automated validation checks to prevent errors and inconsistencies.

#### Data linkage and integration

- Enable secure data linkage with other relevant sources (e.g., employment data, training records).
- Establish explicit approval criteria for integrating data sources.

## SAFE Data: Implementation for the Observatory

- Establish a data governance policy defining anonymisation and access levels.
- Deploy automated de-identification processes for incoming data.
- Implement a secure data catalogue where researchers can discover datasets with clear metadata descriptions.

## SAFE Settings

SAFE Settings focuses on providing secure environments where data can be accessed and analysed without the risk of breaches, leaks, or misuse. In the context of the Sport and Physical Activity Workforce Observatory, it ensures that sensitive workforce data is protected from unauthorised access while still enabling legitimate research and analysis.

### Key considerations for SAFE Settings

#### Secure data infrastructure

- All data must be stored in a secure, cloud-based Trusted Research Environment (TRE), ensuring data never leaves a controlled setting.
- Implement role-based access controls (RBAC) with expiration policies to restrict access based on user credentials and project needs.
- Use end-to-end encryption for data storage and transfer.

#### Access controls and monitoring

- Implement multi-factor authentication (MFA) for all users accessing the Observatory's data.
- Maintain detailed access logs and audit trails to track who is interacting with the data and when.
- Conduct regular security reviews and penetration testing to identify vulnerabilities.

#### Data processing and analysis tools

- Enable secure, interactive research environments.
- Restrict copying, downloading, or exporting of raw data to prevent unauthorised data leakage.
- Prohibit local data downloads or transfers outside of the secure research environment.

## User support and training

- Ensure that all researchers undergo data security training before accessing the system.
- Offer ongoing technical support to help users navigate the secure research environment without compromising security.

## SAFE Settings: Implementation for the Observatory

- Deploy a centralised data access platform with integrated security controls.
- Implement GDPR aligned definitions for data controllers and users.
- Establish continuous monitoring systems for real-time detection of unauthorised activities.

## SAFE Outputs

SAFE Outputs ensures that all data results shared externally comply with strict disclosure controls to prevent sensitive workforce information from being unintentionally revealed. For the Workforce Observatory, this principle guarantees that insights generated from workforce data remain statistically robust, non-disclosive, and aligned with ethical standards.

### Key considerations for SAFE Outputs

#### Statistical disclosure control (SDC)

- Implement automated and manual checks to prevent the release of personally identifiable workforce data.
- Apply minimum cell count rules (e.g., suppress data where fewer than five individuals are represented).

#### Approval process for data release

- Require all reports and publications to go through an independent security review before external release.
- Develop a tiered approval system for different types of outputs (e.g., internal reports vs. public dashboards).



## Transparency and public communication

- Ensure that all published findings are explained in accessible, non-technical language to build trust with workforce professionals and policymakers.
- Maintain an open research registry listing all published reports derived from Observatory data.
- Researchers must cite sources and follow data referencing guidelines.

## Alignment with SAFE Settings

- Outputs should be cross-checked with security measures.

### SAFE Outputs: Implementation for the Observatory

- Develop automated SDC tools for pre-checking outputs.
- Establish a data release committee to review all major reports.
- Provide guidelines on ethical workforce data reporting to researchers.

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# Glossary

## **Trusted research environment (TRE)**

A secure computing environment where researchers can analyse sensitive data without extracting it.

## **Anonymisation**

The process of removing personally identifiable information from data.

## **Pseudonymisation**

Replacing private identifiers with fake identifiers to allow data linkage without exposing identities.

## **Multi-factor authentication (MFA)**

A security system requiring multiple forms of identity verification.

## **Statistical disclosure control (SDC)**

Methods to ensure that published research does not accidentally reveal private information.

## **Data minimisation**

Ensuring only the necessary data is accessed for research purposes.

## **Ethical review board**

A committee overseeing the ethical considerations of research projects.

## **Role-based access control (RBAC)**

A system that restricts access to data based on user roles.

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– through data-driven insights, bridging theory and practice, and fostering  
meaningful collaboration between academia and the sector.