

## Written evidence submitted by My Wellbeing Analytics Ltd

# Concussion in Sport

Dear Committee Members,

Having reviewed the evidence that has been presented in the inquiry sessions on the 9 and 23 March there are some supplementary observations that I would like to make.

My name is Henry Kinniburgh and in presenting this evidence I look at the problem from two perspectives. Firstly, as a parent and a youth rugby coach of 12 years. Secondly, as the Founder of a new company, My Wellbeing Analytics Ltd, that is developing products to help athletes collect information on head injuries across their playing careers and provide a self-assessed cognition test that can be used to measure cognitive function on a repeatable basis.

Based upon research into the topic and my personal experiences there are two main observations that I would like to make, that don't seem to have been raised in the sessions to date:

### 1. Reporting of sports injuries, including head injuries, is not fit for purpose

When an employee, student or member of an organisation suffers an injury in the place of work, study or activity, it is the responsibility of that party to record the injury in an accident book. This happens routinely. When an athlete represents their school, university, club or country it should be the responsibility of that organisation to collect information on any injuries the athlete suffers as a result of their participation. This does not happen.

In practice, no records are created of the injuries an athlete suffers while participating in sport, it is only when referred to medical professionals that an injury record is generated. This is particularly important in relation to head injuries, as a [US study](#) suggests that over 50% of concussions go unreported or undiagnosed. Out-with elite sport, the onus is on the athlete to seek medical advice, with the vast majority of head injuries going unreported.

To validate these assertions, the following checks were carried out:

- Discussions with a range of youth sports coaches outlined that, in their experience, when a player suffers a head injury they are removed from play, where appropriate, and after the match a parent is asked to look out for relevant concussion symptoms and to go to the doctor if symptoms persisted or got worse. There was no requirement to record the injury.
- A recent Freedom of Information (FOI) request to Oxfordshire County Council (ref. 17903), indicated that in the period 2018-2020 there were 14 reported suspected concussions in primary schools and 1 in secondary schools (including 6<sup>th</sup> form). Based on typical rates of concussion, these reporting rates are remarkably low.
- Subject access requests were submitted to schools, sixth form college and sports clubs, on behalf of a family member who is known to have suffered a range of head injuries. In SAR responses the only head injuries recorded were when medical staff were involved. No data on other head injuries suffered while playing were recorded, although it is known that injuries were sustained.

Medical practitioners have been highlighting the lack of data relating to sport related concussion and the benefits of maintaining more structured records for a number of years. This need is identified in the following:

- The 2017 Concussion in Sport Group (CISG) [consensus statement](#) recommended that a detailed, structured SRC history would be of value, rather than the current dependence on the recall of athletes and coaches, which is unreliable.
- A [2015 paper](#) looking at 'Sports related injuries in children from NHS emergency care data in Oxfordshire' highlighted the need for improved classification for sports injuries in a medical context

On reviewing these findings, it is of significant concern that data relating to sports injuries, particularly concussive injuries, are not recorded in a repeatable, structured manner in the way that other injuries are. This is unacceptable and should be rectified if we are serious about managing sports related concussion.

## 2. It is difficult for athletes to view their concussion history

We highlighted above that there is a gap in the recording of head injury data. However, even if this data was available, it is still challenging for an individual athlete to get a holistic view of the head injuries they have suffered during their playing career.

Throughout an athlete's playing career they will represent a number of schools, clubs, universities and potentially international teams, all of whom will collect data on the athlete, along with the data collected by physios, club doctors and GP's. It may also be that the athlete has participated in multiple sports, making the task of collecting information even more challenging.

Any information held by the various parties on head injuries is special category personal data and covered by data protection law (UK General Data Protection Regulation). Therefore, athletes should be able to request access to their personal data via a subject access or data portability request.

In practice the relevant injury data is neither collected, nor retained. Sometimes this information is not recognised as personal data. When you look at the privacy notices of these organisations, very few outline that they collect special category personal data on athletes.

We believe that clubs, schools etc, need to recognise their data protection responsibilities in relation to head (and other) sports injuries, collecting and retaining data for the relevant timescales. We recognise that many clubs and schools will struggle to manage this from a knowledge and cost perspective.

An alternative approach would be to make coaches responsible for collecting injury data (on behalf of organisations) on a regular basis, providing reports that can be submitted to a governing body who would be responsible for maintaining head injury records over the long term. This would allow athletes to access head injury records more readily, being able to provide them if any medical condition arises. In today's information society this should not be a significant or onerous activity.

## Moving Forward

There has been discussion about new research and technology in the field of concussion, all of which is needed and could be accelerated. However, there are fundamental issues that need to be addressed if the output is to be leveraged once available. Today, there are concussion protocols in some sports, but not in others. Some sports have an understanding of head injury frequency, others do not. There is no consistency in how concussion is managed. In addition, at a macro level, no single body has been able to quantify the scale and impact of sport related concussion across the UK. Without this data it is impossible to make targeted interventions and reduce concussion injury rates.

We believe there are short term actions that could be taken to improve outcomes for athletes. The changes we believe would be beneficial are:

1. Either a government department (DCMS) or other bodies (such as Sport England) should be responsible for maintaining a record of overall sports injuries/ concussions;
2. Each sports governing body should be responsible for collecting head injury rates across their sport, at all levels.
3. Each organisation that runs sports teams should have a concussion policy in place, addressing fundamental issues including:
  - A common understanding of the condition and issues in their sport;
  - Club / coach responsibilities regarding concussive injuries;
  - Procedures for assessing concussion and dealing with head injuries / concussion;
  - Appropriate concussion training is put in place;
  - A requirement for head injuries to be recorded;
  - Annual reporting requirement.

We do not believe that these recommendations place an overly onerous responsibility on clubs or schools but will reinforce to all concerned that head injuries are a serious, life threatening issue.