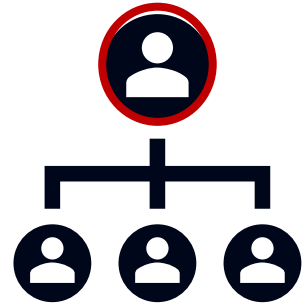


# Data Protection Competency Framework

Competency Card



Executives

Tech  
&  
Tools

Business  
&  
Law

People  
&  
Values



**Depends**  
Data Protection



# How to use these competency cards

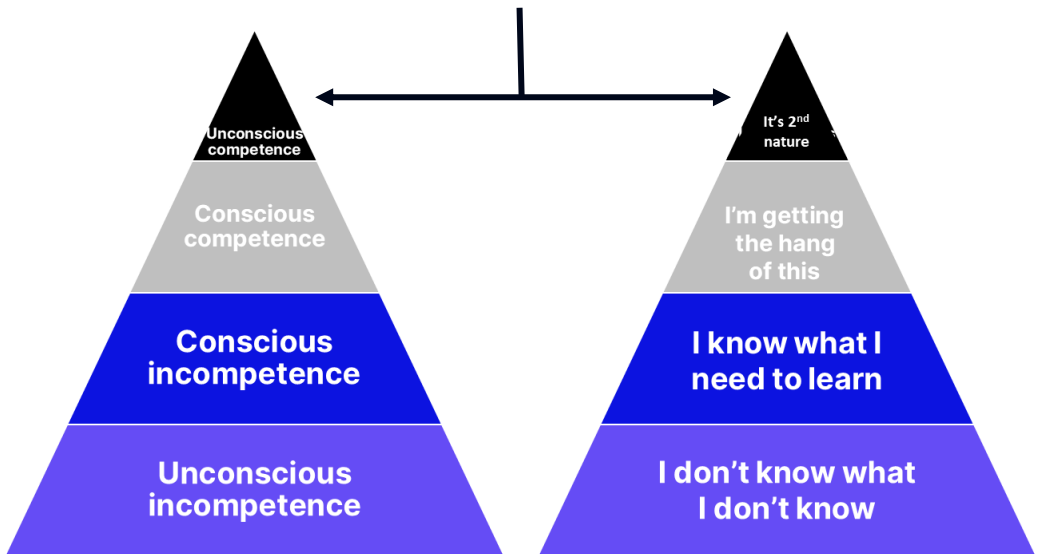
There are 16 behaviours that support compliance and good practice in data protection.

1. Consider each of the 16 “You” statements.
2. Rate how competent you feel about meeting what the statement says, using the scales below.

For example:

To what extent do *“You accept accountability for making business decisions which have data protection implications?”*

Response: *“Yes, I do this along with the senior management team – it’s how we operate”*





## Data Protection Law

Language  
&  
concepts

Principles  
& Rights

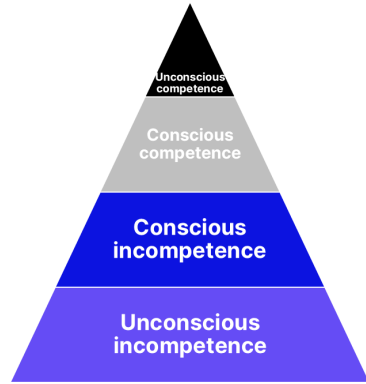
Human  
risk

Strategy

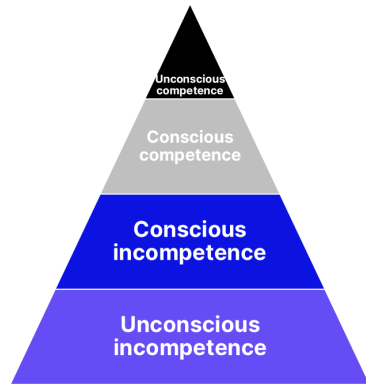
Vision,  
Mission,  
Strategy

Business  
risk

Risk  
Management



**Depends**  
Data Protection



You play an active role in aligning organisational strategy and governance arrangements with the requirements of data protection law

You uphold and affirm data protection principles and rights within your leadership role

You frame robust data protection practices as a strategic enabler, when addressing your organisation's compliance position and operational standards

You give human risk due consideration in setting strategic policy and operational priorities for data protection

You encourage and model an effective risk management approach

on,  
mission,  
Strategy

Risk  
Management



**Depends**  
Data Protection



Culture

Communication

Values  
&  
Ethics

Sharing for  
good

Unconscious  
competence

Conscious  
competence

Conscious  
incompetence

Unconscious  
incompetence

Policies  
&  
Procedures

Transparency

Decision  
making

Reporting

Accountability  
&  
Governance



**Depends**  
Data Protection



You establish the organisation's values and ethics, lead by example in demonstrating them; and are open to feedback on the effectiveness of these measures

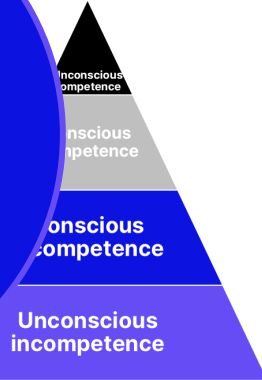
You are realistic and circumspect about the resourcing necessary to carry out disclosures safely and lawfully, incorporating these requirements into planning and budgeting

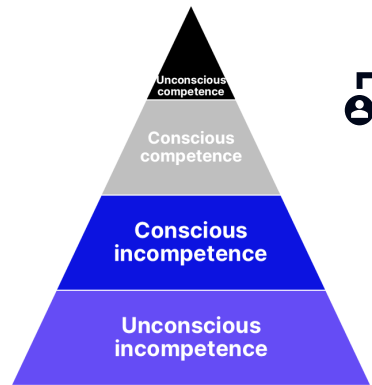
You establish data protection policy by evaluating and communicating an appropriate balance of legal, operational, commercial and ethical risk for your organisation

You recognise transparency obligations as an opportunity to effectively communicate important information to individuals

You accept accountability for making business decisions which have data protection implications

You pay attention to data protection reporting, and are open to hearing about risks, improvements or concerns





## Technology

Literacy  
&  
Acceptable  
Use

Privacy  
Enhancing  
IT

Quality  
&  
Monitoring

Assurance

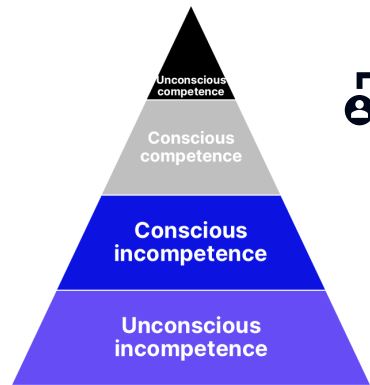
Data  
Protection  
Records

Data  
Management

Record  
keeping



**Depends**  
Data Protection



You make provisions for improving / maintaining staff tech literacy in organisational strategy and planning

You are willing to consider the value of recommended PETs in terms of human risk and ethics, alongside financial cost

You seek to mitigate systemic factors which present barriers to data protection quality and compliance

You identify and allocate adequate resources to maintaining essential record-keeping activities, while leading good practice by example

You recognise and factor the organisation's data management needs into technology strategies and planning

