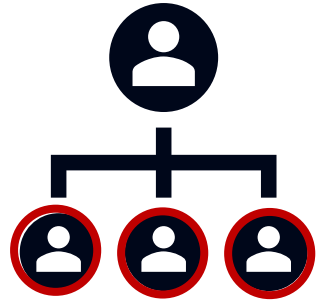
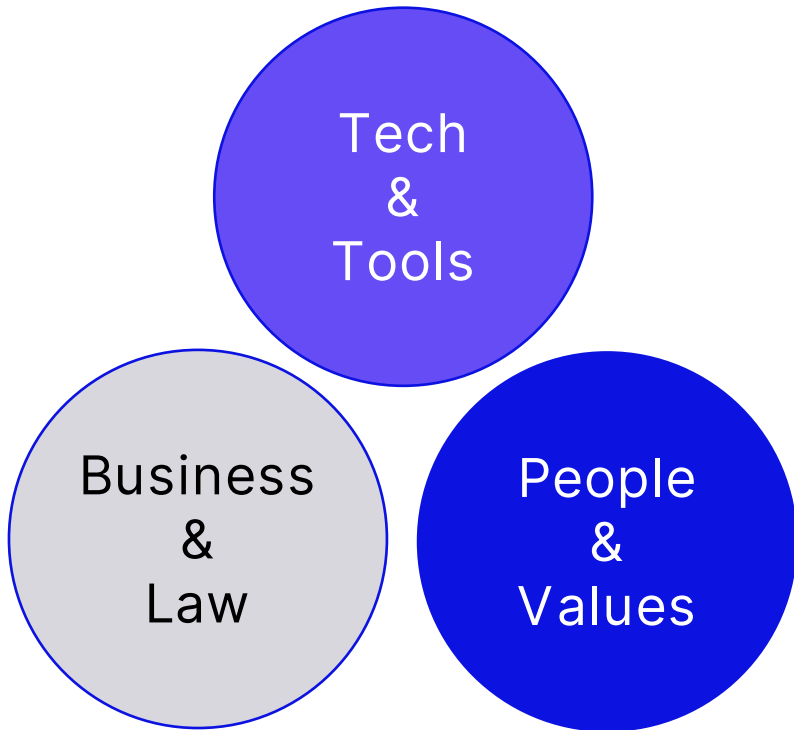


Data Protection Competency Framework

Competency Card



Business Process
Owners



Depends
Data Protection



How to use these competency cards

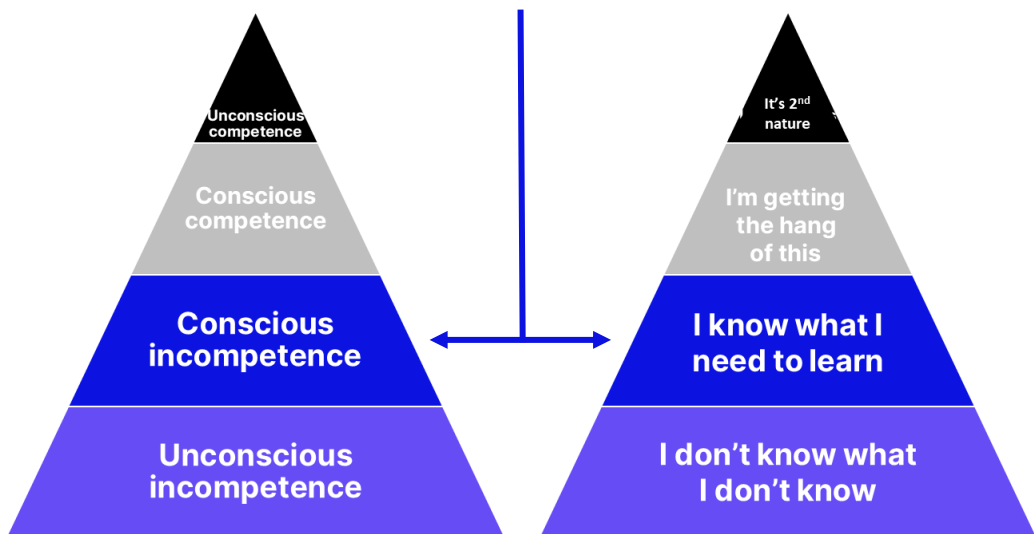
There are 16 behaviours that support compliance and good practice in data protection.

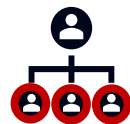
1. Consider each of the 16 “You” statements.
2. Rate how competent you feel about meeting what the statement says, using the scales below.

For example:

To what extent do “*You play an active role in aligning business practices with data protection obligations?*”

Response: “*I’m pretty active but could do more! – I know what I need to do and learn*”





Data Protection Law

Language
&
concepts

Principles
& Rights

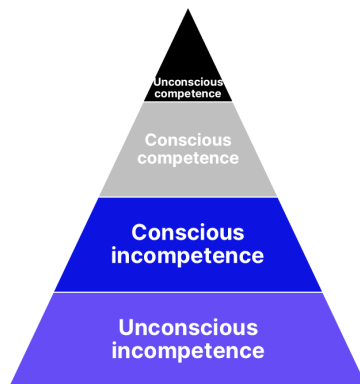
Human
risk

Strategy

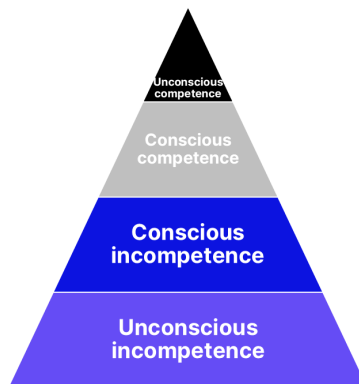
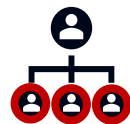
Vision,
Mission,
Strategy

Business
risk

Risk
Management



Depends
Data Protection



You can describe the purposes and lawful bases of the processing activities within your area of responsibility, taking appropriate steps to create and maintain evidence requirements to support lawful processing

You take steps to integrate data protection by design and by default as a core component in the business processes you are responsible for

You play an active role in aligning business practices with data protection obligations

You consider potential and actual conflicts between business and human risk when developing or supervising processes resolving these according to organisational policy and risk tolerances

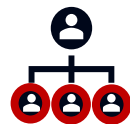
You pay attention to data protection risks and contribute to measures necessary to prevent them from turning into issues

Vision

Risk Management



Depends
Data Protection



Culture

Communication

Values
&
Ethics

Sharing for
good

Policies
&
Procedures

Transparency

Decision
making

Reporting

Unconscious
competence

Conscious
competence

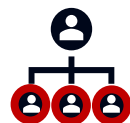
Conscious
incompetence

Unconscious
incompetence

Accountability
&
Governance

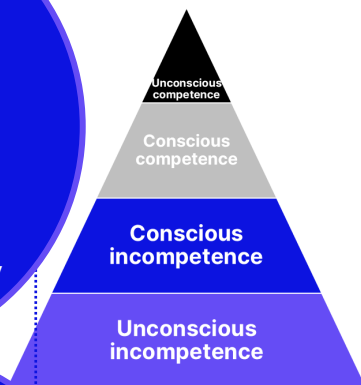


Depends
Data Protection



You include consideration of organisational values and ethics when making decisions that relate to processing of personal data

You only direct, or permit, personal data to be disclosed outside the organisation when you are confident it will be done so safely and lawfully in practice



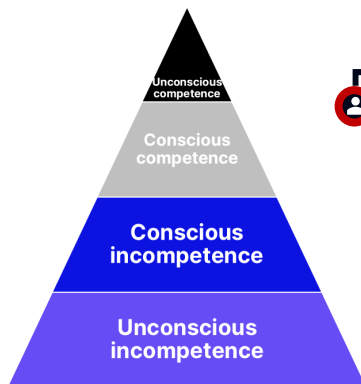
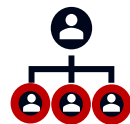
You write clear, accessible policies and procedures which are aligned with data protection requirements and effective in practice

You take steps to update and maintain privacy information provided to individuals

You obtain advice from the DPO to inform your own decision-making; your decisions have data protection as a key aspect from the start (rather than attempting to add it on later)

You encourage and support reporting of data protection risk, concerns or problems; and engage constructively with data protection reporting





Technology

Literacy
&
Acceptable
Use

Privacy
Enhancing
IT

Quality
&
Monitoring

Assurance

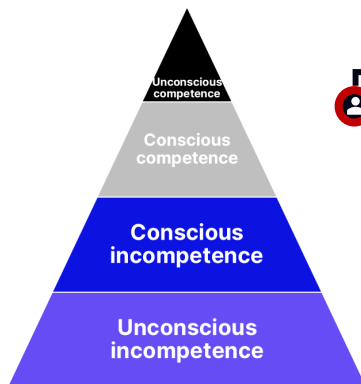
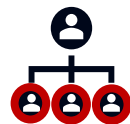
Data
Protection
Records

Data
Management

Record
keeping



Depends
Data Protection



You seek advice and consider data protection risks before introducing new technologies or changes to how technology is used

You give consideration to the benefits of PETs

You foster a fair and consistent approach to risk and problem reporting

You make use of the organisation's ROPA, setting a good example of data protection record-keeping in your own activities

You make provisions for suitable data management resources within the business processes you oversee

