



# Privacy and Data Protection Role Descriptor

## GLDF | Global Learning and Development Framework

The role descriptor will support the anti-doping industry by clarifying the main characteristics of key anti-doping roles. It can be used to support the development of a job description when an Anti-Doping Organization (ADO) aims to recruit a Privacy and Data Protection practitioner. ADOs should tailor this role descriptor to their specific needs and realities.

The Privacy and Data Protection role descriptor provides a high-level overview of this role and includes:

Key purpose of the Privacy and Data Protection role

Role summary

Key responsibilities

Qualities and attributes

Qualifications and experience

Typical employer organizations

Example of job titles

Career progression and professional development opportunities for the practitioner undertaking this role



## Key purpose of the role

The privacy and data protection role assists the anti-doping organization in maintaining accountability and trust in its handling of personal information by implementing privacy and data protection standards and fostering a privacy and data protection culture in the organization.

The allocation of functions covered by this role to one person or a team of people across the anti-doping

organization (ADO), or to external counsel, will depend on the size and capacity of the organization, as well as the national and/or international context. In many ADOs, the person responsible for carrying out this role internally might not be exclusively dedicated to privacy and data protection matters. However, some jurisdictions may impose independence requirements to this role that, in effect, prevent the individual from conducting other functions within the organization.



## Role Summary

The privacy and data protection role acts as the privacy and data protection champion within an ADO, supporting the organization in complying with the ISPPPI and applicable privacy and data protection laws, and fostering a culture of privacy and data protection throughout the ADO, raising the awareness of and training staff that process personal information.



## Key responsibilities

The responsibilities of the Privacy and Data Protection role typically involve:

To support the ADO in complying with the ISPPPI and applicable privacy and data protection laws, and to ensure the organization receives appropriate legal advice where necessary

To assist the ADO in ensuring it has valid legal grounds to process personal information for anti-doping purposes

To prepare and maintain records of data processing activities, and assess the privacy and data protection risks of such activities

To support the organization in embedding privacy and data protection into its operations, including with respect to privacy-by-design and data sharing/transfer matters

To support the ADO in adhering to retention times for personal information set out in Annex A of the ISPPPI, and defining appropriate retention periods for any other personal information processed by the organization

To prepare, implement and regularly review the organization's internal privacy policies and procedures

To serve as the main contact within and outside the ADO for privacy-related inquiries, requests, or complaints

If necessary, to provide notice of a security breach to the relevant individuals, regulators, and other organizations, and to coordinate the ADO's response to privacy and data incidents

To work with IT professionals to ensure appropriate safeguards for personal information are implemented

To foster a privacy and data protection culture within the organization, raising awareness and/or offering training where necessary



## Qualities and attributes

Common values in the anti-doping industry, regardless of the role a practitioner undertakes, which should be checked for in candidates to the position, are:

**Integrity** (equity, justice, fairness, courage, accountability)

**Excellence** (professionalism, innovation, quality, competence)

**Respect** (honesty, openness, inclusion, diversity)

**Collaboration** (engagement, teamwork)

**Dedication** (passion)

The Core Competency Framework for Anti-Doping Practitioners further describes these core values with descriptive statements and captures the competencies that are common across the various roles of the anti-doping industry. It is a useful tool to refer to if the ADO seeks to further develop the list of qualities and attributes that a candidate to any position in anti-doping should be able to demonstrate.

Based on the results of a survey that was circulated among privacy and data protection practitioners across the anti-doping industry in 2021, a list of skills was identified as necessary for the profession. The following list details skills deemed as essential by over 65% of respondents. Such skills should be assessed in candidates applying for a privacy and data protection role:

- Ability to work in compliance with code, standards, ethics

- Ability to work with sensitive information and maintain confidentiality
- Writing
- Listening
- Analytical and logical thinking
- Decision making
- Planning
- Project management
- Attention to detail
- Speaking
- Goal setting
- Ability to develop, write and edit legal documents
- Critical thinking
- Risk analysis
- Being able to use word processing spreadsheets, social media, data visualization and email communication
- Strategic thinking
- Ability to lead change
- Ability to give and receive feedback
- Teamwork collaboration
- Self-motivation
- Stress management
- Willingness and ability to learn

This role needs to be able to negotiate with and find common ground among other leaders across the organization.



## Qualifications and experience

The privacy and data protection role is significantly involved in identifying and monitoring legal requirements, ensuring compliance of the ADO's processing activities with these requirements, as well as ensuring appropriate IT safeguards are in place to protect personal information. Therefore, candidates for the role must be able to display a background, whether academic and/or professional, in law, preferably privacy law and/or information security, computer science or a similar field.

Depending on the profile of the candidate, to the following qualifications should be considered.

**For a candidate with a legal background:**

Knowledge of data protection laws and requirements

Knowledge of information security or IT an advantage, to be able to provide helpful guidance on risk assessments, security measures, and impact assessments

Ability to advocate for privacy within the organization

Demonstrated experience in privacy and/or compliance-related risk management positions

For a candidate with an information security or similar field background:

Knowledge of information security or IT

Knowledge of data protection laws and requirements, an advantage

Demonstrated experience in cybersecurity, information security, information technology, or a similar field

The risk associated with privacy and data protection are also industry dependent, which is why it is important that the privacy and data protection role

enjoys a good understanding of the ADO's operations, and the data handling needs of anti-doping activities. While this knowledge can be acquired on the job, prior knowledge and/or experience in the following areas would be useful advantages for a privacy and data protection role in anti-doping:

- Working knowledge of the sport and anti-doping systems' structures at national, regional, and international level
- Understanding of the relevant technical and governance aspects of anti-doping at national and international level



## Examples of job titles

Legal counsel

Privacy and Data Protection Officer

Privacy Lead

Privacy Manager

Data Protection Officer

Head of Risk and information



## Career progression and professional development

The privacy and data protection role is a new role for many anti-doping organizations and increasingly in high demand, because of the requirement in the ISPPPI and other legal frameworks to have a person designated as accountable for the organization's compliance with privacy and data protection requirements, but also because of a context of heightened privacy and data protection threats.

This results in an environment where a candidate with the ability to instruct an ADO on what is needed, what the role should include, and even the value the role can bring to the organization is highly sought after.

The inherent benefits of employing a privacy and data protection professional with specific anti-doping knowledge could nudge ADOs' senior management to invest in the development of in-house staff rather than outsourcing that role. Opportunities for professional development may include further education and obtaining professional privacy or security-related certifications (such as the International Association of Privacy Professionals (IAPP) ones in privacy, or the ISACA ones in governance and risk management).



## Typical employer organisations

National Anti-Doping Organization (NADO)

Regional Anti-Doping Organization (RADO)

International Sports Federation (IF)

Major Event Organization (MEO)

World Anti-Doping Agency (WADA)

## Collaborators

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WADA, while leading the standard setting work to develop the professional standards, works collaboratively with stakeholders and WADA technical teams. The development work for Privacy and Data Protection was conducted by the Technical Working Group composed of:

- Daniel Cooper - Covington & Burling LLP
- Frederique Horwood - WADA
- Johanna Szymczak - NADA Germany
- Julia Hardy - UKAD
- Nicholas Shepherd - Covington & Burling LLP
- Rachel Campbell - Osler Hoskin & Harcourt
- Regine Reiser - NADA Germany

This group was chaired an Education practitioner from the anti-doping industry:

- Katrien Daelman - WADA

## Quality Management

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## GLDF Overview

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One of WADA's six priorities under the World Anti-Doping Agency's 2020-2024 Strategic Plan is to 'Grow Impact'. As one of the key initiatives under this priority, the Agency has committed 'to developing training programs and qualifications standards for anti-doping professionals to improve professionalism and enhance the capabilities of the anti-doping workforce'.

Accordingly, in April 2020, WADA's Education Department commenced development of a Global Learning and Development Framework (GLDF), through which specific, standardized training for a range of anti-doping roles are being developed and made available for Anti-Doping Organizations (ADOs) and other stakeholders worldwide within the anti-doping ecosystem. The GLDF establishes role descriptors, professional standards and global learning and development activities for practitioner roles in the anti-doping industry.

The role descriptors have been used by WADA to develop competency-based training programs. They can be read alongside:

- (1) the professional standards for the corresponding role, which describe the expected standard of competence for a given role
- (2) the anti-doping core competency framework, which details the values and competencies that are common across the various roles in the anti-doping industry.

*\*\* The Professional (occupational) Standards are the benchmarks of good practice and describe the expected standard of competence for a given role. They should not be confused with the International Standards, which are a set of documents that, along with the World Anti-Doping Code, seek to harmonize anti-doping policies, rules and regulations among Anti-Doping Organizations (ADOs) for specific technical and operational parts of anti-doping programs.\*\**