NAIH közlemény a 2017-2019 között az Európai Unió finanszírozásában, a NAIH részvételével futó STAR projekt (Support Training Activities on the data protection Reform) eredményeiről.

Budapest, 2019. november „5"

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Budapest, "5." November 2019

Announcement on the results of the STAR project

The STAR project (Support Training Activities on the data protection Reform) aimed at contributing to a more effective application of the EU data protection reform package, through supporting the training activities of EU Data Protection Authorities (DPAs) and data protection officers (DPOs) on the EU data protection reform, especially the General Data Protection Regulation (GDPR).

Each DPA and DPO developing training programmes and materials in isolation increases the overall cost involved, risks undermining the harmonising effect of the GDPR, spreading different sets of competing interpretations and best practices and puts greater pressure on the GDPR consistency mechanisms. The financial and human resources (including staff numbers) of EU DPAs and DPOs are also highly variable, meaning that not all have the capacity to generate training materials efficiently.

The STAR project provides freely available, ready-made and easily customizable training materials necessary to carry out their training operations. These training materials are easily adaptable to specific training situations and they are freely and publicly available in a digital form, saving thus time and reducing the workload of trainers and facilitating a harmonized training of the GDPR across the EU. With such materials, trainers can reduce their workload, as the ground-setting work has already been carried out for them by STAR.

The Partners based their work not only on the respective EU legal framework and academic literature, but engaged with stakeholders multiple times throughout the project, assessed their actual needs. In the project the Consortium carried out qualitative interviews in January-April 2018 with representatives of the Member States' DPAs and public and private sectors' DPOs and gathered information on the training methods applied by them and also identified the difficulties of the implementation of the new data protection regime. Based on the findings of the interviews the Partners developed the training materials.

The training materials include:
- 11 training topics focusing on the GDPR,
- seminar materials (i.e. Microsoft PowerPoint presentations) for each one of the topics with detailed guidance for trainers and suggested reading materials,
- training scenarios,
- a takeaway reference GDPR checklist,
- a ten-point GDPR introductory list,
- an evaluation questionnaire for attendees.

The topics were compiled by comparing the prioritized lists of topics from data protection authorities and other training stakeholders that emerged from the interviews the STAR Consortium conducted. The training topics, structure and materials are developed with an objective of meeting the learners' needs. The ten plus one topics are the following:

- Topic 1 - Introduction to the European Union Data Protection Regime
- Topic 2 - Purposes and legal grounds for processing personal data
- Topic 3 - The rights of the data subject and their exercise
- Topic 4 - Responsibilities of data controllers and processors
- Topic 5 - Role of the DPO
- Topic 6 - Role of the DPA
- Topic 7 - Technical and organisational measures
- Topic 8 - Risk-based approach to data protection
- Topic 9 - Data Protection Impact Assessments
- Topic 10 - Data Protection Communication
- Topic 11 - It's not just the GDPR

A presentation has been developed in Microsoft PowerPoint format for each of the above referred topics. These presentations are easily adaptable and customizable to different audiences as well as to the specific needs of the trainer. Trainers are further assisted in the preparation for the training activity. In particular, in the notes-section below each slide useful information can be found (i.e. the trainer's guidance on how to tailor down the materials to meet the needs of the audience and the format of the training):

- aim and objective of the slide,
- pedagogic strategies and guidance,
- timing (importance) of the slide,
- an indication of the slide's degree of difficulty [i.e. whether it is suited for data protection beginners or not],
- its target audience [everyone vs authorities, lawyers, data protection officers, etc.],
- list of respective legal provisions,
- list of respective case law,
- list of respective additional reading,
- further notes,
- its degree of importance [whether it is essential to deliver it, or if it can be removed without impacting the effectiveness of the training].

It must be underlined that the slides are not applicable immediately as they require customization and preparation. The trainers are responsible for adjusting the training material to the level of expertise of the training recipients.

The Microsoft PowerPoint presentations in .pptx format are available in the following link: http://www.project-star.eu/training-materials

Disclaimer!
Regardless of the changes in the layout, the training material should acknowledge the STAR project and its funding. The following text is advised to be used: "This material was developed by the STAR project, www.project-star.eu. (Support Training Activities on the data protection Reform; 2017-2019) and was co-funded by the European Union under the Rights, Equality and Citizenship Programme 2014-2020 (REC-RDAT-TRAI-AG-2016) under Grant Agreement No. 769138." Further guidance for the use and display of the European Union flag in relation to this acknowledgement can be found at: https://ec.europa.eu/easme/en/communication-toolkit.

To further support the work of the trainers a handbook was also edited during the project. This handbook serves as a guiding document for DPAs and DPOs on how to use these materials. It provides trainers with additional knowledge around GDPR training that has been gathered by the STAR Consortium, including feedback gathered through stakeholder interviews and trials of the STAR materials. The handbook sensitises trainers to issues that may emerge in GDPR training and provides pedagogic support to trainers who may lack previous training experience.

The handbook is not intended to contain all the factual content on the GDPR, this resides in the seminar material for each of the topics (e.g. in Microsoft PowerPoint presentations).

The results of the STAR project were presented on the final events organized by the Consortium:
- on 17 October 2019 in Brussels, Belgium
  - this event is dedicated specifically to Data Protection Officers
  - please see the details of the event here:
    https://brusselsprivacyhub.eu/events/17102019.html
- on 22 October 2019 Tirana, Albania Side Event of the International Conference of Data Protection and Privacy Commissioners
  - this event is dedicated specifically to representatives of Data Protection Authorities
  - please see the details of the event here:
    https://privacyconference2019.info/conference/side-events/

These events introduced and discussed the final results of the STAR project (co-funded by the European Union (EU) under its Rights, Equality and Citizenship programme (2014-2020)). The panel identified the challenges and best practices around data protection training. The panels then launched the ready-made, easy-to-customise and easy-to-run training materials, (i.e. 11 Microsoft PowerPoint presentations, training scenarios, further supporting forms as well as a handbook for trainers and users of the materials) targeted for DPAs and DPOs. During the event speakers guided the audience through the STAR materials and, in form of a discussion, gathered their feedback and experience from training activities thereafter.

The STAR project demonstrated fast growing interest in assistance, a need for expanding the data protection knowledge dissemination activities to other groups of stakeholders emerged. The STAR II (Support small And medium enterprises on the data protection Reform II) project builds on and expands the results of the STAR project, yet it targets a different group of stakeholders, namely SMEs, who are structurally different, encounter different problems with GDPR compliance and have different needs. Furthermore, in many instances, they fall into the scope of specific, often protective, legal frameworks.