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## STAR training scenarios

STAR is developing GDPR training material that is intended to be useable across a range of different training scenarios. A scenario is a set of descriptive criteria that describe how the training will be delivered and set out how the training material is to be used in practice. These scenarios are not binding, but make clear our assumptions about likely ways in which the training materials developed by STAR will be used (e.g. a particular DPA may give introductory staff two days training rather than a week). These assumptions derive from the research conducted by STAR contained in Deliverables D2.2 and D2.4. A user of the STAR training material can find the scenario that most closely matches their use for the training material, and then identify any particular pedagogic approaches, practical considerations and the best ways to use the materials provided by STAR.

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| Scenario #1 –DPO Self directed study | |
| Capsule description | The STAR training materials are used by an appointed data protection officer to reinforce and improve their own knowledge. They are likely downloaded directly from the STAR project website and used at the DPOs own pace. |
| Trainer | Data protection officer (self) |
| Expected knowledge of Trainer | Moderate to high in data protection, may require some updating to GDPR issues. Interested in new developments in the GDPR and accessing/identifying best practice. |
| Trainee | As trainer |
| Expected knowledge of Trainee | As trainer |
| Why use STAR? | To access freely available, good-quality training materials, developed with the support of EU DPAs. |
| Timing | One hour sessions, broken up over several weeks of real time, fitted around other workload commitments of the trainee |
| Delivery format | Online, downloaded Powerpoint slides |
| Self-directed or trained? | Self-directed |
| budgeting or other constraints | No budget/zero costs |
| Special considerations  (including pedagogic issues) | There is no trainer in this scenario.  Materials include notes on priority and importance to help guide.  Materials should be logically structured to help this user approach the material in the best order. |
| STAR Modules to use  (include key topics, and additional topics). | All (self-selected as required by the user, or taken in order) |
| slides to use or remove | No need to remove any slides |
| Supporting material to use |  |
| how to specify for sector or national differences. | N/A  However, this scenario would most likely benefit from the translation of STAR materials into common national languages. |
| Further adaption needed from trainer / host | None |
| Additional reading | Please see individual slide topics |
| Other comments |  |

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| Scenario #2 – New staff training at a data protection authority | |
| Capsule description | In this scenario, the STAR training materials are used internally within a data protection authority to introduce newly hired or recruited staff to the GDPR. |
| Trainer | Data protection authority, Staff |
| Expected knowledge of Trainer | Expected to be very high - data protection professional, with some years of experience. |
| Trainee | New staff |
| Expected knowledge of Trainee | Potentially low, including no previous data protection training. May have professional experience in other areas, but may also be a new recruit coming from education. May also include apprentices or interns. |
| Why use STAR? | To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To improve harmonisation with training delivered at other DPAs |
| Timing | One week |
| Delivery format | Classroom |
| Self-directed or trained? | Trained |
| budgeting or other constraints | Staff-time cost, premises |
| Special considerations  (including pedagogic issues) | Will probably require high tailoring to national practices to ensure that the trainee is not given generic training |
| STAR Modules to use  (include key topics, and additional topics). | * Topic 1: Introduction to the European Union Data Protection Regime * Topic 3: The rights of the data subject and their exercise * Topic 4 - Responsibilities of data controllers and processors * Topic 6: The role of the Data Protection Authority |
| slides to use or remove | Need to spend some time adapting the national slides to the relevant national context |
| Supporting material to use | Decisions and procedures of the relevant DPA |
| how to specify for sector or national differences. | Add national materials in the relevant, customisable slides |
| Further adaption needed from trainer / host | Insertion of organisational branding  Insertion of any organisational best practices  Linking to any other organisational training practices  (this will likely be done once, then that adapted material re-used for several training sessions) |
| Additional reading | Please see individual slide topics |
| Other comments |  |

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| Scenario #3 – Specialist training for data protection authority staff | |
| Capsule description | In this scenario, the STAR training materials are used internally within a data protection authority to introduce generalist staff to a specialist issue with the GDPR and take a deeper dive into a particular area. |
| Trainer | Data protection authority, Staff |
| Expected knowledge of Trainer | Expected to be very high - data protection professional, with some years of experience, and specialism in a particular domain of data protection |
| Trainee | Data protection authority, Staff |
| Expected knowledge of Trainee | Moderate to high, applied data protection experience.  The trainee has likely already completed the training in scenario #2 or equivalent. |
| Why use STAR? | To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To improve harmonisation with training delivered at other DPAs  To benefit from the specialised focus of some of the later STAR materials. |
| Timing | One to two hours. |
| Delivery format | Classroom |
| Self-directed or trained? | Trained |
| budgeting or other constraints | Staff-time cost, premises |
| Special considerations  (including pedagogic issues) | Trainer understands why this area requires some specific focus  Assumes that the train |
| STAR Modules to use  (include key topics, and additional topics). | Uses a single module, as appropriate, from:   * Topic 5: The role of the Data Protection Officer * Topic 7: Data protection in practice: Technical and organisational measures * Topic 8: Risk-based approach in the GDPR * Topic 9: Data protection impact assessments * Topic 10: Data protection communication * Topic 11: It’s not just the GDPR - GDPR related laws and special provisions |
| slides to use or remove | Need to spend some time adapting the national slides to the relevant national context |
| Supporting material to use | Decisions and procedures of the relevant DPA |
| how to specify for sector or national differences. | Add national materials in the relevant, customisable slides |
| Further adaption needed from trainer / host | Trainer's experience will add to the value of the slides. |
| Additional reading | * Opinion 4/2007 of the Article 29 Data Protection Working Party of the European Commission on the concept of personal data (WP136) 20 June 2007 * Opinion 1/2010 of the Article 29 Data Protection Working Party on the concepts of controller and processor (WP169) 16 February 2010 * Handbook on European data protection law - 2018 edition <http://fra.europa.eu/en/publication/2018/handbook-european-data-protection-law> |
| Other comments |  |

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| Scenario #4 – DPAs training for Civil servants and public sector employees | |
| Capsule description | A formal classroom scenario where a national data protection supervisory authority provides training to civil servants and public sector employees in that country. |
| Trainer | Data protection authority |
| Expected knowledge of Trainer | High |
| Trainee | Civil servants and public sector employees |
| Expected knowledge of Trainee | Moderate to high data protection knowledge. |
| Why use STAR? | To allow quick responses to requests for training from civil servants and public sector organisations (these training sessions can be ad-hoc and responsive for many DPAs).  To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To improve harmonisation with training delivered at other DPAs  As a basis for addressing more specific questions arising from the trainee's own experiences. |
| Timing | 2 Days |
| Delivery format | Classroom |
| Self-directed or trained? | Trained |
| budgeting or other constraints | It is unlikely given the resources involved, that the DPA would be responsible for all data protection training within a national civil service. It is more likely that this is delivered to data protection specialists, who can then further disseminate this knowledge through their departments. |
| Special considerations  (including pedagogic issues) | This training may be a statutory responsibility for national DPAs depending upon their formal constitution, or it may be a strategic service the offer to generally increase the level of data protection awareness and professionalism. |
| STAR Modules to use  (include key topics, and additional topics). | * Topic 1 – Introduction to the European Union Data Protection Regime (if required). * Topic 6 – the role of the data protection authority * Topic 4 – responsibilities of data controllers and processors * Topic 11 – Its not just the GDPR – GDPR related laws and special provisions * Additional specialist topics, potentially including:   + Topic 7: data protection in practice: Technical and organisational measures.   + Topic 8: risk based approach in the GDPR   + Topic 9: Data protection impact assessments   + Tropic 10: Data protection communication |
| slides to use or remove |  |
| Supporting material to use | Intro to GDPR, compliance checklist, operational forms |
| how to specify for sector or national differences. | Replace private sector examples with public sector examples  Include references to foundational legislation for the entities being trained. |
| Further adaption needed from trainer / host | Pay particular attention to the legal grounds for processing personal data related to legal obligations.  Identify and include any transparency obligations for civil service  Identify and include any relevant national security exemptions |
| Additional reading | * Opinion 4/2007 of the Article 29 Data Protection Working Party of the European Commission on the concept of personal data (WP136) 20 June 2007 * Opinion 1/2010 of the Article 29 Data Protection Working Party on the concepts of controller and processor (WP169) 16 February 2010 * Handbook on European data protection law - 2018 edition <http://fra.europa.eu/en/publication/2018/handbook-european-data-protection-law>   And see individual slide topics |
| Other comments |  |

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| Scenario #5 – DPAs training judges | |
| Capsule description | The STAR slides are adapted by a data protection authority to provide specific training for judges. The aim here is bring judges up to speed on data protection issues. |
| Trainer | Data protection authority |
| Expected knowledge of Trainer | High |
| Trainee | Judges |
| Expected knowledge of Trainee | Very high legal knowledge, assumed working knowledge of data protection law and rapid ability to become familiar with the text, however, potentially limited practical experience of data protection. |
| Why use STAR? | To reduce the time and effort required for the trainer  To access and use the added-value elements of STAR based upon current research and academic thinking around data protection.  To improve harmonisation with training delivered at other DPAs (particularly important the likelihood of cross-jurisdiction data protection cases).  To allow quick responses to requests for support from judges. |
| Timing | 1 day |
| Delivery format | In person, potentially individually or small groups. |
| Self-directed or trained? | Trained |
| budgeting or other constraints | Staff-time cost, premises |
| Special considerations  (including pedagogic issues) | Expect this scenario to be very strongly led by the needs and interests of the trainee. It is worth identifying these before the training session is delivered. |
| STAR Modules to use  (include key topics, and additional topics). | * Topic 1 – Introduction to the European Union Data Protection Regime (if required) * Topic 6 – the role of the data protection authority * Topic 8: Risk-based approach in the GDPR * Topic 7: data protection in practice: Technical and organisational measures. |
| slides to use or remove |  |
| Supporting material to use | Intro to GDPR, operational forms |
| how to specify for sector or national differences. | Need to spend some time adapting the national slides to the relevant national context (these are marked within the training materials). |
| Further adaption needed from trainer / host | Topic 1 may not be necessary, or can be passed through at some speed if the trainee is already familiar with this material. |
| Additional reading | * Opinion 4/2007 of the Article 29 Data Protection Working Party of the European Commission on the concept of personal data (WP136) 20 June 2007 * Opinion 1/2010 of the Article 29 Data Protection Working Party on the concepts of controller and processor (WP169) 16 February 2010 * Handbook on European data protection law - 2018 edition <http://fra.europa.eu/en/publication/2018/handbook-european-data-protection-law> * European Court of Human Rights, Press Unit (2018) *Factsheet – Personal Data Protection*, Council of Europe, Strasbourg; <http://echr.coe.int/Documents/FS_Data_ENG.pdf> * CJEU, C-275/06, Productores de Música de España (Promusicae) v. Telefónica de España SAU [GC], 2008 * ECtHR, Vereinigung bildender Künstler v. Austria, No. 68345/01, 2007 * CJEU, C-28/08 P, European Commission v. The Bavarian Lager Co. Ltd [GC], 2010 * CJEU, C-73/07, Tietosuojavaltuutettu v. Satakunnan Markkinapörssi Oy and Satamedia Oy [GC], 2008 * ECtHR, Axel Springer AG v. Germany [GC], No. 39954/08, 2012 * CJEU, C-101/01, Criminal proceedings against Bodil Lindqvist, 2003 * CJEU, C-582/14, Patrick Breyer v. Bundesrepublik Deutschland, 2016 |
| Other comments |  |

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| Scenario #6 – DPA training (new) DPOs | |
| Capsule description | National supervisory authorities delivering classroom training sessions to newly appointed data protection officers. |
| Trainer | Data protection authority staff |
| Expected knowledge of Trainer | High (specialist) |
| Trainee | Data protection officer |
| Expected knowledge of Trainee | Moderate. May require some updating to GDPR issues. |
| Why use STAR? | To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To improve harmonisation with training delivered at other DPAs  To provide trainees with take-home material on other topics |
| Timing | Two days |
| Delivery format | Classroom |
| Self-directed or trained? | Trained |
| budgeting or other constraints | Staff-time cost, premises – can potentially be charged to the trainees, depending upon DPA constitution, obligations and strategy. |
| Special considerations  (including pedagogic issues) | The aim of training here is likely to establish a good common baseline standard for DPOs and to set clear expectations about their interaction and relationship with the data protection authority. |
| STAR Modules to use  (include key topics, and additional topics). | * Topic 1: Introduction to the EU Data protection regime * Topic 2: the rights of the data subject and their exercise * The rights of the data subject and their exercise. * Topic 4: Responsibilities of data controllers and processors * Topic 5: The role of the Data Protection Officer * Topic 6: the role of the data protection authority |
| slides to use or remove |  |
| Supporting material to use | Intro to GDPR, compliance checklist, operational forms |
| how to specify for sector or national differences. | n/a |
| Further adaption needed from trainer / host | n/a |
| Additional reading | * WP29: Guidelines on Data Protection Officers <https://ec.europa.eu/information_society/newsroom/image/document/2016-51/wp243_en_40855.pdf>; * WP29 Guidelines on Data Protection Officers ANNEX - FREQUENTLY ASKED QUESTIONS, <https://www.alstonprivacy.com/wp-content/uploads/2016/12/2016-12-13-WP29-FAQs-on-DPOs-WP243-Annex.pdf> |
| Other comments |  |

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| Scenario #7 – DPA training (experienced or established) DPOs | |
| Capsule description | National supervisory authorities delivering specialist classroom training session on specific topics to experienced data protection officers. |
| Trainer | Data protection authority domain expert |
| Expected knowledge of Trainer | High (domain expertise and experience in the topic chosen). |
| Trainee | Data Protection Officers |
| Expected knowledge of Trainee | Moderate to high. Interested in new developments in the GDPR and accessing/identifying best practice. |
| Why use STAR? | To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To improve harmonisation with training delivered at other DPAs  To benefit from the specialised focus of some of the later STAR materials. |
| Timing | Half-day |
| Delivery format | Classroom |
| Self-directed or trained? | Trained |
| budgeting or other constraints | Staff-time cost, premises – can potentially be charged to the trainees, depending upon DPA constitution, obligations and strategy. |
| Special considerations  (including pedagogic issues) | These sessions are likely deployed to spread best practice, and to conduct deeper dives into specific areas. Concrete examples are likely paramount. The trainer should be prepared to engage with concrete questions arising from the practical experiences of the trainees.  DPAs also gain the potential to understand issues and challenges that DPOs are facing in practice. |
| STAR Modules to use  (include key topics, and additional topics). | Uses a single module, as appropriate, from:   * Topic 7: Data protection in practice: Technical and organisational measures * Topic 8: Risk-based approach in the GDPR * Topic 9: Data protection impact assessments * Topic 10: Data protection communication * Topic 11: It’s not just the GDPR - GDPR related laws and special provisions |
| slides to use or remove |  |
| Supporting material to use | Guidance on selected topic from the DPA,  Relevant Opinions on the selected topics from Article 29 Working party / EDPB. operational forms |
| how to specify for sector or national differences. | N/A |
| Further adaption needed from trainer / host | N/A |
| Additional reading | Please see individual slide topics |
| Other comments |  |

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| Scenario #8 -DPA training for private sector (different sectors e.g. healthcare, education) | |
| Capsule description | In this scenario, the STAR training materials are used by a DPA to offer training for representatives of different industries and sectors. |
| Trainer | Data protection authority, Staff |
| Expected knowledge of Trainer | Expected to be very high - data protection professional, with some years of experience. |
| Trainee | Private sector DPOs |
| Expected knowledge of Trainee | Variable, may be first point of interaction with data protection, but may be professional specialists in other areas (e.g. management, HR). |
| Why use STAR? | To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To improve harmonisation with training delivered at other DPAs |
| Timing | 1 day |
| Delivery format | Classroom |
| Self-directed or trained? | Trained |
| budgeting or other constraints | Staff-time cost, premises – can potentially be charged to the trainees, depending upon DPA constitution, obligations and strategy. |
| Special considerations  (including pedagogic issues) |  |
| STAR Modules to use  (include key topics, and additional topics). | * Topic 1: Introduction to the EU Data protection regime * Topic 2: Purposes and legal grounds for data processing * Topic 3: The rights of the data subject and their exercise * Topic 4: Responsibilities of data controllers and processors |
| slides to use or remove | Add in slides from Topic 11: Its not just the GDPR – GDPR related laws and special provisions - that are relevant to the sector being trained. |
| Supporting material to use | Intro to GDPR, compliance checklist, operational forms |
| how to specify for sector or national differences. | If delivered for a particular industry or sector (e.g. education or healthcare), then this training needs the highest degree of specification from the base STAR materials. Examples can be shifted to apply directly to the industry of sector involved.  This specification should include prior discussion with industry representatives to identify the key issues facing that sector. |
| Further adaption needed from trainer / host | None |
| Additional reading | Please see individual slide topics |
| Other comments |  |

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| Scenario #9 – Training to be published by a DPA for data controllers and processors | |
| Capsule description | A data protection authority customises the training material to take into account their organisational priorities, branding and national specific legislation, then makes this available on their website, or by request, as guidance for data controllers and processors to use as required. |
| Trainer | DPA (to adapt material) |
| Expected knowledge of Trainer | High |
| Trainee | Data controller or processor (self) |
| Expected knowledge of Trainee | low |
| Why use STAR? | To provide freely available, good-quality training materials, developed with the support of EU DPAs.  To improve harmonisation with training delivered at other DPAs |
| Timing | One hour sessions, broken up over several weeks of real time, fitted around other workload commitments of the trainee |
| Delivery format | Online, downloaded Powerpoint slides |
| Self-directed or trained? | Self-directed |
| budgeting or other constraints | No budget/zero costs |
| Special considerations  (including pedagogic issues) | There is no trainer in this scenario.  Materials include notes on priority and importance to help guide.  Materials should be logically structured to help this user approach the material in the best order. |
| STAR Modules to use  (include key topics, and additional topics). | All (self-selected as required by the user, or taken in order)  High priority for:   * Topic 1: Introduction to the EU Data protection regime * Topic 2: Purposes and legal grounds for data processing * Topic 3: The rights of the data subject and their exercise * Topic 4: Responsibilities of data controllers and processors |
| slides to use or remove | No need to remove any slides |
| Supporting material to use | Intro to GDPR, compliance checklist |
| how to specify for sector or national differences. | N/A  However, this scenario would most likely benefit from the translation of STAR materials into common national languages. |
| Further adaption needed from trainer / host | None |
| Additional reading | Please see individual slide topics |
| Other comments |  |

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| Scenario #10 – DPO internal training for staff involved in data protection | |
| Capsule description | A DPO uses the STAR training materials to deliver training to staff in their organisation with specialist data protection related roles (e.g. IT, HR, communications, or within a DP team). |
| Trainer | DPO |
| Expected knowledge of Trainer | Moderate to high data protection knowledge |
| Trainee | DP-adjacent staff |
| Expected knowledge of Trainee | Low to moderate |
| Why use STAR? | To access freely available, good-quality training materials, developed with the support of EU DPAs.  To benefit from the specialised focus of some of the later STAR materials.  To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities. |
| Timing | Multiple ½ day sessions |
| Delivery format | Small group discussions, mentor-led study |
| Self-directed or trained? | Hybrid – initial training sessions, followed up by self-directed use of the STAR materials. |
| budgeting or other constraints | None. |
| Special considerations  (including pedagogic issues) |  |
| STAR Modules to use  (include key topics, and additional topics). | All |
| slides to use or remove |  |
| Supporting material to use |  |
| how to specify for sector or national differences. |  |
| Further adaption needed from trainer / host | Little customisation is strictly required, but the training materials could be adapted to include organisational policies and procedures (e.g. internal process for responding to a subject access request, DPO contacts, etc). |
| Additional reading | Please see individual slide topics |
| Other comments |  |

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| Scenario #11 – DPO internal training for staff not involved in data protection, but who may encounter data protection issues. | |
| Capsule description | A DPO uses the STAR training materials as the starting point to roll out an organisation-wide data protection awareness training programme to ensure that all staff, even those without a data protection job element are aware of the organisation's responsibilities, policies and procedures around data protection. |
| Trainer | Organisational DPO |
| Expected knowledge of Trainer | Moderate to high |
| Trainee | All staff within an organisation (company, charity, etc) |
| Expected knowledge of Trainee | Potentially non-existent data protection knowledge. |
| Why use STAR? | To reduce the time and effort required for the trainer, and allow them to focus upon their organisational priorities.  To access freely available, good-quality training materials, developed with the support of EU DPAs. |
| Timing | 1 hour |
| Delivery format | Webinars |
| Self-directed or trained? | Trained |
| budgeting or other constraints |  |
| Special considerations  (including pedagogic issues) |  |
| STAR Modules to use  (include key topics, and additional topics). | * Topic 1: Introduction to the EU Data protection regime |
| slides to use or remove |  |
| Supporting material to use | Intro to GDPR |
| how to specify for sector or national differences. | Examples can be changed to examples drawn from the specific experience of the training organisation. |
| Further adaption needed from trainer / host | Potentially substantial adaption.  Trainer should include   * Organisational data protection processes and policies (e.g. subject access requests, data breaches reporting process) * Key contact details for reporting – e.g. DPO * Any organisational "philosophy" for data protection and GDPR compliance. |
| Additional reading | None. |
| Other comments |  |