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| logo_ec_17_colors_300dpi | EUROPEAN COMMISSION  DIRECTORATE-GENERAL JUSTICE AND CONSUMERS  **Unit 04: Programme management** |

**JUST/2017/Action grants**

**PART B - Submission TEMPLATE**

**PROJECT DESCRIPTION AND IMPLEMENTATION**

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| **Proposal number:** | SEP-210496763 |
| **Proposal acronym:** | STAR II |

**NOTICE**

All personal data (such as names, addresses, CVs, etc.) mentioned in your application form will be processed in accordance with Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data. Your replies to the questions in this form are necessary in order to assess your grant application and they will be processed solely for that purpose by the department responsible for the Union grant programme concerned. On request, you may be sent personal data to correct or complete it. For any questions relating to this data, please contact the Commission department to which the form must be returned. Beneficiaries may lodge a complaint against the processing of their personal data with the European Data Protection Supervisor at any time (Official Journal L 8, 12.1.2001).

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# Part 1 – General Description of the project and applicant organisation

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| 1.1. Abstract ***(max. 2000 characters)***  Describe briefly the project's objectives, its activities, the type and number of persons who will benefit from the project, the expected results and the type and number of deliverables to be produced. The type and number of deliverables should be in line with the "Indicators" excel sheet that is to be provided as an Annex 3 to this application. See also point 1.11 below.  **This part should be identical to the abstract provided in Part A.**  ***Note****: You are requested to include information under all headings mentioned below and to respect the limit of 2000 characters indicated above. If your proposal is written in a language other than English, please include an English version of this abstract under point 1.17 of this document.* |

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| There are pressing needs to (1) assist European Union (EU) data protection authorities (DPAs) in raising awareness among businesses, especially small and medium enterprises (SMEs), about the new EU legal framework for personal data protection, particularly the General Data Protection Regulation (GDPR), and (2) assist these SMEs in ensuring compliance therewith. The new law and all its novelties create for many stakeholders confusion and uncertainty as to its practical application, magnified by its upcoming applicability (May 2018). Some 22 million European SMEs, who are the focal point of the EU enterprise policy, are particularly vulnerable as personal data protection law affects them as any other business, yet SMEs rarely can afford professional legal advice. Thus, they merit special support from public authorities.  The STAR II project will directly address these needs and will: (1) review the state of the art in DPA awareness-raising activities, (2) analyse SMEs’ experience with first months of the functioning of the GDPR, (3) run an awareness-raising campaign for SMEs and (4) a trial hotline (12 months) to respond to SMEs’ questions, measuring its performance and the most frequently asked questions, and – on that basis – (5) prepare a digital guidance ~~guidance~~ for DPAs on good practices in running a hotline and raising SME awareness, and (6) a handbook (digital and printed) for SMEs on EU personal data protection law. These results will be prepared in consultation with stakeholders (especially via validation workshops and the External Advisory Board) and widely disseminated. STAR II outputs will be freely available, openly accessible and copyright-unrestricted, thus easily reusable and adaptable.  STAR II is addressed to 28 EU DPAs and millions of EU SMEs. It will deliver tangible and long-term results to SMEs, directly assisting them in compliance with the GDPR (by hotline and guidance material) and – indirectly – to DPAs, to fulfil their awareness-raising mission. |

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| 1.2. Definition of the problem, needs assessment and objectives of the project What are the problems and/or the current situation? Which are the needs that the project aims to address?  In relation to these problems and needs, what are the major objectives that the project should attain? Who are the target group(s) of your activities and why were they chosen?  ***Note:***  *You are expected to provide here a needs assessment for your proposed activities. Such needs assessment should include relevant and reliable data and should contain a robust analysis clearly demonstrating the need for the action. The applicant can refer to existing research, studies, previous projects which had already identified the need. The needs assessment must make it clear to what extent the action will meet the need and this shall be quantified. You are requested to be specific and focus on the actual needs that your project will aim to address and not limit the analysis to general statements and information about the problems and needs of the target group in general.* |

There are two primary beneficiary groups for the STAR II project: (1) small and medium enterprises (SMEs) in the EU – according to the latest estimations, around 22 million [1] – who will be affected by the upcoming changes of the EU regulatory framework on personal data protection, and (2) EU data protection authorities (DPAs) (both at a national level and – where appropriate – regional or sub-federal-level Member State DPAs as well as the European Data Protection Supervisor [EDPS] and the European Data Protection Board [EDPB], around 40+ organisations) – who need to supervise and assist these SMEs, among others, in the practical application of the GDPR [2]. STAR II has a secondary audience in privacy and data protection regulators and professionals inside and outside of the EU. Its outputs can be easily adapted and reusable in the European Economic Area (EEA), Switzerland and – perhaps with a bit more effort – anywhere else in the world. In other words, the STAR II project is targeted to the EU, i.e. SMEs and DPAs therein, and focuses solely on the key part of EU data protection law, namely the GDPR.

The EU data protection reform, comprised essentially of the GDPR (Regulation 2016/679) and the Police and Criminal Justice Data Protection Directive (Directive 2016/680; Directive), was only concluded on April 2016. There is a lot of uncertainty around the new law. The GDPR will become applicable across the EU on 25 May 2018. This has left a short period of time for SMEs to adapt into the new regulatory environment. The novelties it brings to the fore, such as a data protection by design and data protection impact assessment (DPIA), only add to this complication. They often need external assistance to understand the gravity of the new Regulation; they need guidance on how to follow their respective Member State national legislation to give full effect of the GDPR; they need to adapt their routine practices; they need to acquire information, solve new or hitherto unnoticed issues and follow trainings on the new legislation; they often need to create and execute an action plan to apply the new framework. In addition, a considerable number of SMEs will need to appoint a data protection officer (DPO), who should immediately become locus of knowledge and expertise on the GDPR compliance and assist them in the implementation of the new regulatory framework requirements. All of the above, on top of their routine, day-to-day work, a new ePrivacy Regulation is currently being developed [3], which is expected to place even more burden on SMEs dealing with information and communication technologies (ICTs). [add about any specific provisions in GDPR re SMEs, to prove they are a different audience] NAIH: Art 30 (5) GDPR !!

The objective of achieving a high level of protection of personal data in the EU, especially through the uniform application of the GDPR, will depend in part upon its unvarying understanding and implementation, yet adjusted to local conditions. However, as these activities evoke significant expenses, not every SME has enough resources to spend, e.g. on professional legal advice. Therefore, as they are a focal point of the EU enterprise policy, they merit special attention and adequate support from the public authorities, including DPAs.

DPAs are normally tasked with a range of activities, of which perhaps supervision is *primus inter pares*. Among these, the public awareness-raising activities of DPAs are not a novelty. DPAs have engaged in these since their inception in 1970s and these activities have taken multiple shapes [4]. They continuously need to adapt their awareness-raising activities to the needs and social and technological progress. Yet, similarly to SMEs, DPAs often have not enough resources, knowledge and know-how to engage in these public awareness-raising activities. Thus, these authorities merit special support from the EU and its Member States.

Recently, the GDPR explicitly made it one of their tasks (cf. Arts 58 and 70). Nevertheless, recent research by consortium members, within the ARCADES project (2014-15) – preoccupied with these efforts with regard to children and minors – demonstrated a growing interest amongst all EU DPAs in being assisted in that regard [3]. Furthermore, the currently ongoing STAR project (2017-19) targets compliance with the GDPR and related instruments through developing training materials for DPAs, DPOs and other officials touching upon personal data protection law in their daily practice. Already in its early months, it demonstrated fast growing interested in assistance [5].

It is therefore necessary and desired to expand the scope of this ‘popularisation of data protection knowledge’ activities to other groups of stakeholders. The STAR II project will build on and expand on the on-going STAR project, yet it will target a different group of stakeholders, namely SMEs, who are structurally different, encounter different problems with GDPR compliance and have different needs.

Consistent with the foregoing, the STAR II project will have four main outputs:

(1) a trial hotline for SMEs,

(2) a trial awareness-raising campaign for SMEs,

(3) a digital guidance for DPAs on ruining a hotline for SMEs and an awareness-raising campaign for SMEs, and

(4) a handbook for SMEs on EU data protection law (both digital and printed).

[1] Cf. <http://ec.europa.eu/eurostat/statistics-explained/index.php/Statistics_on_small_and_medium-sized_enterprises>.

[2] On the role of DPAs, cf. e., g. Colin Bennett & Charles Raab, *The governance of privacy: policy instruments in global perspective*, Ashgate Publishing 2003.

[3] Cf. COM(2017) 10 final.

[4] Gloria González Fuster, Dariusz Kloza & Paul De Hert, “The many faces of privacy Education in European schools”, in: González  Fuster, G. & Kloza, D. (eds.), *The European Handbook for Teaching Privacy and Data* *Protection at Schools*, Intersentia, Cambridge 2016; <http://arcades-project.eu/images/pdf/arcades_teaching_handbook_final_EN.pdf>.

[5] Cf. <http://www.project-star.eu>.

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| 1.3. Relevance and justification ***(max. 4000 characters)***  How does your project address the call priority under which you are applying? What is the project's contribution in this area?  What are the innovative aspects of the project? |

[later]

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| 1.4. Expected results ***(max. 4000 characters)***  What are the expected results of the project? Who will benefit from these results and how?  How will the target groups of the project benefit concretely from the project results and what shall change for them?  How will these results contribute to achieving the objectives of the call priority under which you are applying?  ***Note:***  *Results are immediate changes that arise for the target groups after the completion of the project (e.g. improved knowledge, increased awareness). Results must be distinguished from deliverables, which are produced with the resources allocated to the project, e.g. training courses, conferences, leaflets.* |

STAR II is essentially a “support SMEs” project. It will result in concrete, ready-made, fully-customisable, white-label and freely available and reusable **handbook on EU data protection law to be provided to SMEs**. [indicate the envisaged TOC, i.e. “at minimum…”.]

Furthermore, it will result in **a guidance for DPAs how to establish and run a hotline and an awareness-raising campaign**, both activities targeted to SMEs, in view of effective implementation of the EU data protection reform package, and in particular the GDPR. [indicate the envisaged TOC, i.e. “at minimum…”.]

While developing these, the project will run **a trial hotline for a period of 12 months and an awareness-raising campaign** **for 1 month**, which, along with the related preparatory works, will constitute a basis for such a guidance. These materials will be designed, drafted, tested, validated and disseminated in cooperation with their intended users, DPAs and SMEs, throughout the project’s term.

This way, STAR II will result in relevant and timely materials, that will address DPAs’ and SMEs’ immediate need for such, so as to effectively promote application of the new EU data protection legal framework. Valuable human and financial resources that would otherwise be required by DPAs and SMEs for the development or acquisition of these materials under the STAR II project will be freed, so as to be used in actual training operations and other data protection work.

Contribution of the above results to the call priority is obvious: targeting SMEs’ needs are integral and necessary component in order to adequately give effect the new legal framework. By providing them with free, relevant, immediately usable materials, STAR II contributes directly to the effective implementation and application of the EU data protection reform, as per the call’s priority. Overall, this is expected to significantly contribute to increasing the level of protection of personal data in the EU.

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| 1.5. European added value ***(max. 2000 characters)***  What is the project's added value at European level?  How will you ensure that the project methodology and/or deliverables and/or results will be transferable at European level?  ***Note:*** *European added value of actions, including that of small-scale and national actions, shall be assessed in the light of criteria such as their contribution to the consistent and coherent implementation of Union law, and to wide public awareness about the rights deriving from it, their potential to develop mutual trust among Member States and to improve cross-border cooperation, their transnational impact, their contribution to the elaboration and dissemination of best practices or their potential to contribute to the creation of minimum standards, practical tools and solutions that address cross-border or Union-wide challenges.* |

STAR II’s European added value lies squarely at its conceptual core. Through the development and provision of its four main outputs – (1) a hotline for SMEs, (2) awareness-raising campaign for SMEs, (3) a guidance for DPAs on running such a hotline and an awareness-raising campaign, and (4) a handbook for SMEs on EU data protection law – it warrants:

1. **Aiding European SMEs in complying with the GDPR** through tangible, long term handbook; Indirectly, the project will present best practices on running a hotline and an awareness-raising campaign for SMEs, addressed to all EU DPAs, to encourage the latter and provide them guidance to that end;
2. In parallel, **increasing public awareness on the individual right to data protection**, because the materials the project will develop will not only be freely available, but also will be actively promoted among the EU data protection community and the whole society through the awareness raising campaign in various media platforms;
3. **Address the EU-wide imminent need for aiding and educating SMEs on the EU data protection reform** in a practical and standardised manner, and developing **best practices** to that end; [comment: proof needed about the need to educate SMEs]

NAIH: The Hong-Kong Privacy commissioner has recently released a relevant publication in the given matter:

**Guidance Note: Data Protection & Business Facilitation - Guiding Principles for Small and Medium Enterprises** [www.pcpd.org.hk/english/resources\_centre/publications/files/sme\_e.pdf](http://www.pcpd.org.hk/english/resources_centre/publications/files/sme_e.pdf)   
  
To view the media statement, please visit:[www.pcpd.org.hk/english/news\_events/media\_statements/press\_20180102a.html](http://www.pcpd.org.hk/english/news_events/media_statements/press_20180102a.html)**Consistent and coherent implementation of Union law**, in particular EU data protection law; the project’s outputs used across the EU will promote a singular, informed understanding of the relevant provisions and will result in promotion of the same implementation and practices;

1. **Improved cross-border cooperation** between DPAs, through the common use and dissemination of the same guidance for DPAs and handbook for SMEs;
2. Indirectly **contributing to the setting of a worldwide standard** (best practice) in personal data protection education, assistance and public awareness.

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| 1.6. Methodology Outline the approach and methodology. Explain why this is the best approach to attain the objectives and the proposed results.  Explain the structure and complementarity of the workpackages. |

[state that STAR II is a ‘needs-based’ project and its outputs will be adjusted as the research progresses; add something about **cost-efficiency** of this project.]

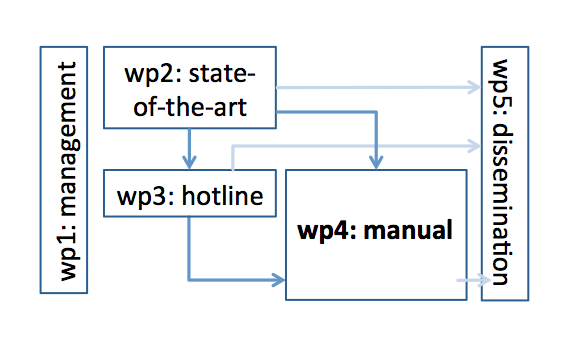
In the early stage of the STAR II project, the consortium envisages frequent and direct contacts with the main stakeholders (i.e. DPAs, SMEs and their DPOs and umbrella organisations) to identify the needs of DPAs, SMEs and their challenges with regard to the EU data protection reform.

In the subsequent stages, STAR II will also make use of comparative analysis and desk research. Eventually, the results of STAR II will be validated by survey and three public workshops. STAR II will also attempt to disseminate its results to relevant high-level conferences as well as in professional and academic publications.

Below, we indicate all research tools that will be used in STAR II, in order of their perceived importance:

1. **Desk research**. The partners will undertake desk analysis regarding the identification of stakeholders (particularly with regard to representative organisations of SMEs per Member State) to be contacted under the STAR II project. In addition, under the same method the drafting of the actual guidance materials to be developed under STAR II is also expected to fall.
2. **Interviews**. This is the preferred research tool in order to identify the needs and challenges. Experience in PHAEDRA I, PHAEDRA II projects as well as in STAR, has demonstrated that semi-structured interviews are the best way to gain the in-depth knowledge on challenges and needs of DPAs. The same is expected to be the case with DPAs and SMEs. While it poses little additional workload, it allows stakeholders to express freely their concerns and problems. It also allows the STAR II partners to immediately clarify any ambiguity in replies and hence is often more reliable than surveys. Additionally, it allows the partners to further strengthen the trust between DPAs and SMEs and the STAR II consortium.
3. **Hotline** would be a source of information about the needs and difficulties about the first months of functioning the GDPR [expand];
4. **Testing and validation**. Once materials have been developed in their first version, an awareness raising campaign will be launched, followed by the running of an actual hotline through 12 months. In this way, their basic assumptions, as well as findings from the interviews, will be learned and addressed in practice. The pilot tests’ results will be assessed and the outcome will be incorporated into the final materials, in view of their finalisation.

The figure below shows the structure of the STAR II project.



Finally, frequent interaction between partners will ensure consistency of results: Partners will participate in periodic coordination meetings, via e.g. instant messengers, to ensure the project is progressing as planned and discuss main research findings. The kick-off meeting at the outset of the project will set the scene therefore, especially by clarifying the exacts means of its realisation. The final wrap-up meeting between the partners will be devoted to discussing the final deliverables and to ensure their dissemination to the wider data protection and DPAs and SMEs community.

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| 1.7. Timeline by workpackage ***(max. 2000 characters)***  Provide in a structured manner the timing of the activities per workpackage by using, for instance, a Gantt chart. |



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| 1.8. The partnership and the core project team ***(max. 4000 characters)***  Describe the partnership of organisations implementing the project (applicant, partners). Explain how the partners were selected, and why is this partnership the best to attain the objectives of the project. Describe the value of the partnership, its strengths/weaknesses, the organisational arrangements within the partnership and how you will ensure coordination within the partnership.  Introduce the persons of the core project team and list the CVs (to be attached to the application) of the key people working in the project (project manager, financial manager and the key experts). |

Similarly to the STAR consortium, the STAR II consortium comprises:

(a) Nemzeti Adatvédelmi és Információszabadság Hatóság [National Authority for Data Protection and Freedom of Information] (NAIH), Hungary (co-ordinator; applicant);

(b) Vrije Universiteit Brussel – Research Group on Law, Science, Technology and Society (VUB-LSTS), Belgium (partner);

(c) Trilateral Research Ltd (TRI), Ireland (partner).

The Nemzeti Adatvédelmi és Információszabadság Hatóság (**National Authority for Data Protection and Freedom of Information**) [NAIH], the Hungarian DPA, … NAIH: The abbreviated version has already been sent to István!

The interdisciplinary **Research Group on Law, Science, Technology and Society** [LSTS] at the **Vrije Universiteit Brussel** [VUB], led by Prof. Dr. Paul De Hert and Prof. Dr. Serge Gutwirth, since its inception in 2003 is devoted to analytical, theoretical and prospective research into the relationships between law, science, technology and society (<http://vub.ac.be/LSTS>). Even if VUB-LSTS’s core expertise is legal, it also has a strong experience and track record in legal theory, philosophy of science and bio-ethics, and engages in criminological and science and technology studies (STS) research too. The VUB-LSTS is has a well-established reputation in research concerning privacy and data protection, profiling technologies, ambient intelligence and ‘autonomic computing’ in a broader sense. The VUB-LSTS counts 47 researchers, including seniors, post-docs, pre-docs and freelancers. The team has been involved in internationally networked research projects and publishes widely. The VUB-LSTS is the main organiser of the annual Computers, Privacy & Data Protection (CPDP) Conference ([www.cpdpconferences.org](http://www.cpdpconferences.org)) and is a host to two research facilities, namely: Brussels Privacy Hub (BPH) (<http://brusselsprivacyhub.org>) and the Brussels Laboratory for Data Protection & Privacy Impact Assessments (d.pia.lab) (<http://dpialab.org>). The VUB-LSTS closely cooperates with the Privacy Salon (<http://www.privacysalon.org>).

**Trilateral Research Ltd** [TRI] is based in Ireland and has a related entity in the United Kingdom, with which it shares resources and expertise (<http://trilateralresearch.com>). Trilateral is a multidisciplinary research services company. Its team collaborates across social science and technology development to bring insights from each into supporting data-driven innovation. Trilateral provides research, advisory and technology development services to private and public sector organisations. Trilateral is widely published in the field of privacy policy research, and has been closely tracking the impacts and changes arising from the GDPR across several domains (including big data, remotely piloted aerial vehicles, certification, impact assessment, and DPA co-operation). As a result of the PIAF, PHAEDRA, PHAEDRA II and STAR projects, its surveys and interviews with DPAs, Trilateral has excellent contacts with the DPAs and privacy commissioners leading the movement for improved co-operation. Trilateral offers bespoke training sessions or packages across all our areas of expertise. Trilateral has developed and delivered ‘Master classes’ and other forms of tailored training for experts and practitioners looking to further develop their organisation’s practice in key areas. Trilateral is also familiar with the development of learning content for online platforms and massive, multiple, open online courses (MOOCs). Training is delivered by domain experts intimately involved in Trilateral’s research and consultancy activity, as well as their wider fields of expertise. Trilateral team members have experience teaching at well-renowned higher education institutions across the EU as well as qualifications in teaching and learning. Trilateral’s research and advisory networks also allow us to bring in domain experts and diverse perspectives.

The partners have a track of long collaboration on EU co-funded action grants, in particular:

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|  | *PIAF* | *PHAEDRA* | *PHAEDRA II* | *ARCADES* | *STAR* |
| NAIH |  |  |  | partner | partner |
| VUB-LSTS | coordinator | coordinator | coordinator | partner | coordinator |
| TRI | partner | partner | partner |  | partner |

The NAIH and VUB-LSTS have collaborated previously in the ARCADES project (*Introducing dAta pRoteCtion AnD privacy issuEs at schoolS in the European Union*; AG DG JUST, 2014-2015; <http://arcades-project.eu>), which concerned training on data protection topics, in the form of the ‘training the trainers’, aimed at teachers in all EU Member States. It concluded with a set of teaching materials to be used in schools in Europe at various levels, culminated with 4-lingual, widely acclaimed *The European Handbook for Teaching Privacy and Data Protection at Schools*, edited by Gloria Gonzalez-Fuster and Dariusz Kloza (VUB-LSTS) [6].

The CVs of the core project team are attached to this application. The team is comprised of:

**- NAIH:**

Dr. Julia Sziklay, principal researcher

Gábor Kulitsán, principal researcher

Dr. Daniel Eszteri, principal researcher

Dr. Attila Péterfalvi, president of the Authority (no cost to the project)

*(two employees to be recruited)*

- **VUB-LSTS**:

Paul De Hert, project & financial manager

Vagelis Papakonstantinou, researcher

Dariusz Kloza, researcher

István Böröcz, researcher

*(a researcher to recruit)*

**- TRI:**

David Wright, Director

David Barnard-Wills, senior research analyst

Filippo Marchetti, junior research analyst

Desmond Faucher, finance manager (no cost to the project)

[6] Cf. <http://arcades-project.eu/images/pdf/arcades_teaching_handbook_final_EN.pdf>.

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| 1.9. Subcontracting ***(max. 2000 characters)***  If applicable, explain the reasons for any subcontracting in your project. |

Not applicable.

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| 1.10. Monitoring of the project implementation ***(max 2000 characters)***  How will you ensure that the project is implemented as planned and what methods will you use to monitor its progress? |

The consortium has proven its reliability in the EU co-funded action grants: PIAF, ARCADES, PHAEDRA I and PHAEDRA II, as well as in the ongoing STAR project. The STAR II consortium will adopt similar measures to monitor the progress of the project and to ensure quality of its work and final output. In particular, it will introduce:

1. **External Advisory Board** (EAB), which would include two representatives from DPAs, SMEs (including DPOs) and distinguished academics. The EAB will have sight of the project’s progress and will be able to comment thereon and provide suggestions on how the goals of the project can best be realised in the context of the planned activities;
2. A representative sample of European DPAs, SMEs, umbrella organisations and legal experts will assess the STAR II materials during three **validation workshops**;
3. **Internal, quarterly overview of project’s progress**, in order to review progress and discuss any unexpected events that might slow down the realisation of the project’s schedule. These calls will be minuted and each relevant milestone, deliverable and event will be tracked.

The consortium can envisage the following standard **risks**, although it does not regard them as very likely:

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| **Risk** | **Contingency measure** |
| 1. Difficulties in finding the participation necessary to conduct the research | Expansion of queries recipients’ list; Contacting DPAs and SMEs to address new requests; Interim contacts with participation requests recipients to anticipate delays and/or refusals |
| 2. Delays in conducting the research and development of the guidance and the handbook | Interim contacts among all project partners to anticipate delays; reallocation of work, if necessary; cooperation with the EC Project Officer (PO) |
| 3. One of the partners is unable to produce high quality training materials | Re-allocation of work among other project partners; Alerting and coordinating with the PO |
| 4. The project team is incapable of working as a team | Conditions for collaboration between the partners spelled out in the consortium agreement (CA); frequent, monthly project partners meetings (via teleconference) (cf. above) |
| 5. DPAs and/or SMEs are not interested in work of the project, esp. the hotline, the awareness-raising campaign, the guidance and the handbook | Edits/amendments to the materials according to evaluation and feedback; intensification of dissemination effort |
| 6. Failure to meet milestones | Coordinator’s responsibility; Regular monitoring of execution of work by project partners; cooperation and coordination with the PO |
| 7. The technical failure to run the hotline | Change of the software/hardware used; continuous backup [expand] |

Identification of any conflicts which arise in the project lies in the responsibility of each project participant. Any signs of disagreement between project participants should be notified to the project coordinator (as appropriate), who should then instigate the conflict resolution procedure. The coordinator will separately contact all parties to identify the different viewpoints. Based on a clarification of viewpoints, the coordinator should try to propose a solution. Consensus seeks to solve the problem. If consensus cannot be reached, each participant exercises a vote. If conflicts relate to matters related to project management, the views of the PO will be sought.

The consortium has an excellent reputation, experience in collaborating with each other, as well as experience and knowledge in the field of study of this new project. We have built some redundancy into the consortium (each partner will have two or more representatives working on the project). All partners have a proven track record of high quality deliverables and publications, and of cooperating together.

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| 1.11. Evaluation of the project activities, deliverables and results ***(max. 2000 characters)***  How will the project activities, the deliverables and the results be evaluated, and by whom?  Explain which quantitative and qualitative indicators you propose to use for the evaluation of the reach and coverage of project activities and project results.  Explain what data will be collected, according to what method and at what moments, including feedback from project participants (satisfaction surveys, evaluation forms, etc).  How will findings be analysed and reported and how will they be used.  ***Note****: For the evaluation of the activities you will be requested to use the participation evaluation questionnaire to be provided by the Commission.*  *You must identify which indicators you will use from the list provided in the Indicators excel sheet and include them in the indicators of your project. You will be asked to report on those indicators as part of the project's Final Report.*  *Where relevant, data must be disaggregated by gender and by age.* |

In order to monitor and evaluate the project activities, outputs and results, the STAR II project will collect and track the following indicators: [@DBW to expand]

* **Statistical, anonymous data on interviews**: number of people interviewed (quantitative), from which organisations, their roles and countries (qualitative); WP2;
* **EAB review of deliverables (qualitative)** – we will retain the feedback upon the deliverables and outputs of the project provided by the EAB; WP2-5;
* **Hotline feedback forms** (quantitative: number of participants, gender, age; qualitative: organisation type, area of activity, country); WP3;
* **Workshop feedback forms** (qualitative: when STAR II hosts workshops or events with DPAs and SMEs, it will circulate feedback forms to capture the participants assessment of the value and quality of the events; WP4;
* **Validation of the developed guidance and handbook** (qualitative): STAR II will capture the perspectives of DPAs and SMEs through their comments and perspectives on the circulated materials; WP4;
* **Expressions of interest and downloads of the hotline guidance and the SME handbook** – by placing the materials behind a log-in on the STAR II website, we will be able to track the number of people who have expressed an interest in the materials, and who have downloaded or accessed them. WP5
* **Confirmed use of hotline guidance and SME handbook** – We will ask that users of the materials inform us of their use, and provide qualitative feedback upon their experiences with the material. WP4-5. This is the absolute key indicator for the success of the project – widely used and well-regarded materials. However, some of this spread and uptake will occur after the lifetime of the project itself. STAR II will however start to track this use. This is somewhat reliant upon self-reports from trainers, but STAR II will set up a mechanism to request and receive such reports.
* **Feedback from DPA and SMEs on the final STAR II materials (qualitative)** – In the dissemination stages of the project we will collect qualitative feedback on the training materials in-use. WP5.

Progress against these indicators will be monitored by the relevant WP leads, and reported to the project manager in the project coordination meetings.

**Dissemination KPI:** As a result of STAR activities, we will achieve the expected impact in the targeted stakeholder communities. The following presents an overview of measureable indicators of the results to be achieved by means of the project’s dissemination and cooperation strategy:

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| * A website that generates over 1000 unique page views (<http://www.project-star.eu>); * At least 1 peer-reviewed scientific publication; * At least 2 publications published in international trade press; | * Presentation of project results in at least two international events; * Over 100 Twitter followers *(@projectSTAR\_eu*); * At least 10 ResearchGate followers; * Social media links with at least 10 representative groups across the EU; |

Progress against the dissemination KPI will be monitored by the WS2 leaders, reported to the project coordinator in the regular project coordination meetings and eventually reported to the EC.

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| 1.12. Dissemination strategy and communication tools How do you plan to disseminate (actively spread) information about the project, its activities and its results? Please specify in particular:   * **Communication needs and objectives**: What are the communication needs and objectives of the project? * **Target groups and multipliers**: What are the target groups? Which stakeholders or other organisations could possibly be supporters and multipliers of the communication activities? * **Key messages:** Which messages will the activities convey in order to meet the communication objectives? * **Distribution channels/tools:** Which communicationchannels/tools will be used to convey the messages to your target groups and multipliers? * How will your dissemination strategy facilitate further use and transferability of the project results? |

STAR II’s **communication needs** in the first phase of the project (M1-M6) are to inform the public about the launch of the project, its goals and means of their achievement. From M7 onwards, NAIH will conduct an awareness-raising campaign in the Hungarian media through a radio ~~and television~~ spot. This campaign aims to draw attention to the new regulatory framework on personal data protection and the particular forms of assistance STAR II will provide, namely the hotline for SMEs in the first place, and – subsequently – the handbook for SMEs and a guidance for DPAs.

The communication needs in the second phase of the project (M17-M24) and persisting beyond the project’s conclusion) shift to informing end-users about the existence and usefulness of the developed guidance materials. This is to ensure that they take-up and use them. This phase also includes capturing the experiences of SMEs as they start to adapt and deploy the training materials in the real world and feeding these back into the development process.

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| **Target group** | **Communication considerations** | **Communication multipliers** | **Primary communications channels and methods** |
| European SMEs | Some 22 million entities [expand] | XXX Professional associations, chambers and other representative organs | XXX newsletters, interviews, commercial/business press |
| EU DPAs | Relatively small number of organisations. High level of familiarity with English, digitally literate. Professionally networked through a number of forums well-known to the consortium. | - Article 29 Working Party/European Data Protection Board [(EDPB)  - European Commission  - ‘Spring Conference’  - International Conference of Data Protection and Privacy Commissioners  - Social media (both Twitter and LinkedIn have DPA presence)  - Advisory Board members | - Personal and institutional contacts  - Direct email  - Interactive webinar (invited participants)  - Presentations at conferences and workshops  - Social media  - Project website  - One-page summary of project results |
| Secondary audience (International data protection authorities and data protection professionals). | Larger and more diverse, but still relatively small number of organisations. Medium level of familiarity with English, digitally literate. Professionally networked through a number of forums well-known to the consortium. | - International professional organisations (e.g. International Association of Privacy Professionals [IAPP])  - Trade press  - Blogs  - Social media (Twitter, LinkedIn, ResearechGate etc. have strong privacy and data protection presence) | - Project website  - Press releases  - Trade press articles |
| Secondary audience (Existing data protection training providers) | Large number of heterogeneous actors, distributed across industry sectors across different countries. High linguistic variance. Potentially sceptical about project objectives. | - Specialist and trade press, including blogs  - Social media (both Twitter and LinkedIn have strong privacy and data protection presence) | - Direct email  - Project website  - Press releases  - Trade press articles |

The **key messages** are the same for the four target groups:

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| *1st phase:* | *2nd phase:* |
| - STAR II project funded, launched and research started  - STAR II project is developing hotline, awareness-raising campaign, guidance and handbook that will be useful to them  - How to become involved in the project’s work (esp. hotline and validation workshops) | - Guidance material exists or will shortly exist  - How to access training materials  - How to get the best use from them |

The consortium’s dissemination strategy comprises several **tools**:

* **Kick-off meeting**: The consortium intends to host a kick-off meeting that, apart from setting STAR II in place, will be communicated to the data protection community so as to inform all stakeholders that training materials on the EU data protection reform are intended to be drafted and made available in the near future;
* **Project digital communication tools (e.g. website, social media accounts)**,comprising information about the project, partners, deliverables and contact opportunities; and news alerts – the consortium will keep all stakeholders informed on the progress of its work, warranting in this way awareness and participation;
* **Several press releases**; targeted at the data protection trade press;
* At least **one paper for a peer-reviewed journal**;
* **Communication with stakeholders** via the partners’ extensive contact lists to inform DPAs and SMEs about progress of the project, its website and deliverables;
* **Communication with stakeholders’ representative organisations** (e.g. SMEs and their umbrella organisations), both at the EU and Member State level;
* Involving the **External Advisory Board** structured to help achieve even wider dissemination;
* Formal dissemination at **third party events** (e.g. the annual Computers, Privacy and Data Protection [CPDP] conference) and **informal communication** via e.g. briefings.

**Further use and transferability.** It is important that the guidance materials are taken and up and used beyond the lifespan of the project. As a DPA, NAIH is well positioned to continue to host the material on their website/maintain the project website. However, the STAR II project will negotiate with further DPAs (including the secretariat of the developing EDPB) to investigate the possibility of hosting, as well as continuing to maintain and advocate for the training materials. Further, the European Commission itself is in a strong position to make such a resource available over the longer term. In addition, the VUB-LSTS and TRI will incorporate the training materials into their own on-going training and consultancy work in the field of privacy and personal data protection.

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| 1.13. Sustainability and long-term impact of the project results ***(max. 2000 characters)***  What is planned as follow-up of the project after the financial support of the European Union has ended? How will the sustainability of the project's results be assured? Are the project results likely to have a long-term impact? How?  ***Note****:**In this part you should not list activities or deliverables of your project, but you should focus on the expected long-term impact of your project. The long-term impact refers to long-term socio-economic consequences that can be observed after a certain period following the completion of the project and may affect either the target groups of the project or other groups falling outside the boundary of the project, who may be winners or losers.* |

The project results are likely to have long-term legal and socio-economic impacts. By reducing the effort that DPAs will have to exert to interact with SMEs regarding the practical implementation of the GDPR, the project will provide resource saving over the lifetime of the Regulation (although with decreasing savings over time, given potential shifts in interpretation of the Regulation, relevant judicial rulings or implementing acts).

Additional longer term benefits come from harmonised implementation across the EU, and the diffusion of the functioning of SMEs outside of the EU. Sustainability of the project’s results is dependent upon whether DPAs and SMEs have confidence in the STAR II output, taking-it up, and using in their everyday practices. STAR II will produce the go-to, gold-standard, DPA-approved material for maintaining hotlines for SMEs and – directly for SMEs – a handbook on EU data protection law.

Identification of and continued dialogue with stakeholders in WP2 will create the necessary engagement with the project, whilst the set of dissemination and communication work under WP5 will make sure that the work is widely known and available. NAIH will host the launch event for the guidances before the conclusion of the project, and will continue to advocate for the material amongst the EU DPA community over the longer term. VUB-LSTS and TRI will incorporate the guidances into their own organizational practices, and the partners will maintain the project website (hosting the material) for two years (at least) following conclusion. All the material developed under STAR II will be provided under an open, unrestricted copyright license, such as Creative Commons licenses, and as such, they will be available for wide use and re-use.

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| 1.14. Ethical issues related to the project ***(max. 2000 characters)***  Describe any ethical issues which you could come across during the implementation of your project, including with regard to interactions with target groups or persons benefiting from the project, and present your strategy to address them. |

The STAR II project, especially the running of the hotline might raise significant ethical issues, therefore the main principles a hotline or call centre code of ethics contain will be carefully examined and followed throughout the lifetime of the project. Additionally, the consortium will develop a separate code of ethics for the hotline, which will contain principles are, *inter alia*, honesty, privacy, integrity, informed consent, equity, balance of power, dignity, respect, etc.

In all communication with all SMEs, DPAs and other stakeholders, the partners will inform them that any person no longer wishing to maintain connection through the hotline, receive news or information about the project activities can be removed from our contact list if they so wish with no negative consequences. We will inform all persons from whom we solicit or gather information that we intend to publish the information gathered in reports which will be publicly available on the project website. Communication with the hotline will be free and can be stopped or suspended at any time. The identities of the persons interacted with will be concealed in the publicly available reports and results. If, for any reason, anyone is opposed to such publication, their wishes will be respected and we will not include any information obtained from them. The partners will not repurpose any personal data (such as contact details) nor sell or give such data to third parties.

A further key ethical issue for STAR II could be the accessibility of the materials developed. These should be designed to follow best practices in accessibility in design [7]. For example, making presentation text large enough to be visible, using easy-to-read fonts with consistent thickness, and using sufficient colour contrast. This will ensure that materials are useable by the widest range of people, and that nobody is unfairly excluded.

[7] <https://www.w3.org/WAI/training/accessible>.

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| 1.15. Mainstreaming ***(max. 2000 characters)***  How do you plan to ensure mainstreaming of equality between women and men and the rights of the child, and respect of the Charter of Fundamental Rightsin the activities of your project?. |

Since 2014, VUB has the Gender Action Plan [8], combing objectives at faculty level with measures designed to ensure a sustainable culture change. Having more women among the academic corps and one-third of directors and of selection and promotion committees of the opposite sex, are two of the key goals of the Plan.

TRI is an SME with strong culture of gender equality, with women in many senior roles. Trilateral also has a workplace equality and diversity policy, with a commitment to equal treatment, employment and promotion based upon experience, aptitude and ability and a commitment to equal professional development.

As a public authority and an employer, NAIH acts in accordance with Hungary’s Fundamental Law and the Act on Equal Treatment and Promotion of Equal Opportunities (2003, amended 2006). As a DPA, NAIH is the competent authority in the field of the freedom of information and the right to privacy.

The key issues for gender mainstreaming and respect for fundamental rights in STAR II project itself are (1) ensuring equal inclusion and participation in the scoping process (primarily in WP2), (2) developing accessible hotline and conducting an awareness-raising campaign that do not exhibit gender bias (primarily in WP3), (3) ensuring equal inclusion and participation in the development of the guidance for DPAs and the handbook for SMEs (WP4). Where appropriate, STAR II will incorporate gender and equality issues within personal data protection law into its work, especially the handbook. The STAR II project will monitor participation in its scoping and validation work, report this to project meetings, and conduct additional recruitment as necessary to correct gender imbalances. Invitations to the EAB will also account for gender balance and to counter potential underrepresentation.

[8] <http://www.vub.ac.be/over/genderactieplan>.

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| 1.16. Description of child protection policy **IF APPLICABLE *(max. 2000 characters)***  If the applicant and/or any of the partners work directly with/have contact with children, provide a description of the child protection policy of these organisations, covering the following topics:   * purpose of the child protection policy; * application of the policy (applicable to which staff, in which situations); * responsibility: who is responsible for ensuring that the policy is adhered to; * description of recruitment and screening processes with regard to child protection policy (details of training on child protection policy and rights of the child, screening, vetting (criminal background check). Preventing harm to children: processes exist to help minimise the possibility of children being abused by those in positions of trust. |

No work or contact with children is anticipated as part of the STAR II project.

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| 1.17. English translation of the abstract **IF APPLICABLE *(max.2000 characters)*** |

Not applicable.

# Part 2 – Description of workpackages and activities

| In Part 2 describe in detail the activities that you will undertake in order to achieve the objectives you described in Part 1 of this document. This section is divided into several workpackages (WP), i.e.: set of activities leading to one or more specific deliverables that you wish to produce.  Any project will have a minimum of two WP: Workpackage 1 with the management and coordination activities and Workpackage 2 with deliverables related to the objective of your project. (This does not imply that a project with just two WP will necessarily score low). The division should be logical and guided by the different identifiable results of an activity. The application form contains boxes for projects with up to 5 Workpackages (including management and coordination). If you think your project has more than 5 WP, please try to group them to be able to present them in the space provided.  Under each WP you should then enter an objective, list specific activities that you will undertake and list the expected deliverables, milestones and critical risks. |
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| ⮞ Workpackage 1 - Management and Coordination of the Project | | |
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| **Workpackage 1** is intended for all activities related to the general management and coordination of the project (kick-off meetings, coordination, project monitoring and evaluation, financial management) and all the activities which are cross cutting and therefore difficult to assign just to one specific Workpackage. In such case, instead of splitting them across many Workpackages, please enter and describe them in Workpackage 1. For this reason, this Workpackage has a different layout, where you do not have to enter objectives and duration. Nevertheless, it will have its own deliverables and corresponding budget. | | |
| **I. Description of the work (activities)**  Be specific, give a short name for each activity and number them.  Indicate for each activity the partner, who will be responsible for its implementation. | | |
| No. | Name and description of the activity | Partner |

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| 1.1  1.2  1.3  1.4 | The Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) will provide the coordination, management and administration of the STAR II project.  **Launch of the action (kick-off meeting) [M1]**  Within the first month of the project, the project coordinator will organise a kick-off meeting in Budapest. This meeting will bring together representatives of the applicant and two partners as well as a representative of the European Commission’s Directorate-General for Justice and Consumers [DG JUST] (EC), the Project Officer (PO), to discuss in detail the actions to be undertaken within the project as well as to clarify the Commission's expectations and any administrative details.  **Project coordination [M1-M24]**  STAR II will be managed overall in accordance with standard project management and risk management best practices. The main tasks of NAIH as project coordinator include monitoring and supervising work progress, maintaining the project implementation plan, liaising with relevant contacts among the partners and the EC. It will be the point of contact with the EC.  In order to best monitor the work progress, the project coordinator will:   1. identify important issues, prepare meeting agendas, organise logistics, moderate the meetings and perform the follow-up with lists of action items and meeting reports; 2. manage and provide the project reporting on partners’ progress and use of resources compared to the contract and agreed work plan; 3. monitor and coordinate the review of deliverables; 4. manage the resolution of any conflicts between partners in the unlikely instance they should arise.   The project coordinator will ensure an effective communication and flow of information between the partners. This is done by the means of regular – quarterly – meetings (via GoToMeeting, telephone conference calls, e-mails and face-to-face, should the need be, meetings amongst partners).  Upon the conclusion of each Work Package, the project coordinator will submit the deliverables to the EC via the Participant Portal (PP) and report on progress of the project (M13 and after the conclusion of the project). At the outset of each Work Package, the partners will consider whether any changes are desirable in the modalities of that Work Package within the context of the overall project, whether there are any risks to the project and, if so, what should be done to contain those risks.  As mentioned above, progress meetings will be held every three months to effectively follow and review the activities of the partners. As part of the launch event of the guidance and the handbook, an internal (wrap-up) meeting will be held in Budapest in the last quarter of the project (M23), where partners will discuss their final outputs and activities. The meeting will aim to ensure coherence between overall results of the project.  **Financial management [M1-M24]**  NAIH will be in charge of project’s financial administration and managing diligently the project funding. Upon receiving funding from the EC, it will distribute it to partners in a timely fashion, under conditions spelled out in the Consortium Agreement (CA).  **External Advisory Board [M4-M24]**  The coordinator will also be responsible for setting up External Advisory Board (EAB). It will initiate the communication with potential members thereof, after a list of suggested members will be compiled by the consortium. The members of the STAR II EAB – by reviewing the project’s work, offering advice on specific issues concerning its subject-matter and actively taking part in certain events, namely validation workshops – will contribute to the project’s development and will ensure high quality of its work. (Members of the EAB will not be remunerated for their work.) | NAIH  NAIH  NAIH  NAIH |

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| **II. Deliverable(s) of this Workpackage**  List the deliverables to be produced by this Workpackage.  Deliverables of your planned activities can be **intangible** (e.g. conferences, seminars, trainings, events, professionals trained) **and tangible** (manuals, reports, leaflets, webpages, articles, training material packages, books). Limit their number and do not include minor sub-items or internal working papers. Indicate the language(s) in which your activity is organized and nationalities of the participants.  Be specific as to the scope and level of ambition and use a quantitative description where applicable, e.g.: X regional seminars; X participants. | | | |
| No. | Deliverable | Characteristics  (e.g. for meetings/trainings: number of participants)  (e.g. for publications, documentation: format (printed/electronic); language) | Target group |

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| 1.1  1.2  1.3  1.4  1.5  1.6 | Progress report  Kick-off meeting  Coordination meetings  Taking stock and ensuring feedback  Composition of Advisory Board  Final, wrap-up meeting | Described above  Described above  Regular and ongoing (every three months)  At the conclusion of each and before the start of the next Work Package, the project coordinator and partners will review the results of the completed and the plans for the next Workpackage. At the conclusion of the project, the project coordinator will review overall results, including, as appropriate with the EC. Some items, e.g. papers for peer reviewed journals and the project website, will continue beyond the contracted life of the project.  A fully operational External Advisory Board.  The meeting will be held during the last quarter of the project, with the aim of allowing the partners the direct discussions in the concluding stage of the project. A possibility to open this meeting to the public will be explored. The aim of which would be to present and further disseminate the materials as well as to further discuss with invited stakeholders (including the EAB) that will ensure the use of the resources and results even after the end of the project. | | | | EC  Project partners and European Commission  Project partners  Project partners and European Commission  NAIH  Project partners | |
| **III. Milestones for the Workpackage** | | MS1 Kick-off meeting (M1)  MS2 External Advisory Board (M4) | | | | | |
| **IV. Critical risks for the Workpackage** | | XXX | | | | | |
| **V. Estimated cost of this Workpackage by cost category** | | A – Direct Personnel Costs | B1 – Direct Travel Costs | B2 – Direct Subsistence Costs | C – Direct Costs of Subcontracting | | E – Other Direct Costs |
| 40 000 EUR | 3 500 EUR | 1 500 EUR | 0 EUR | | 6 000 EUR |
| **VI. Estimated human effort required for this Workpackage** (in person /months)**:** | | 8 person/months | | | | | |

| ⮞ Workpackage 2: Title: : STATE-OF-THE-ART | |
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| Duration in months: **6** | Leading partner: **TRI** |
| **I. Objective(s) of this Workpackage** | |

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| Interact with EU DPAs and EU SMEs in order to capture their experience with first months of the functioning of the GDPR, and to review the state-of-the-art in DPAs’ awareness-raising. At the end of this WP, the consortium will be positioned with enough knowledge to establish an awareness-raising campaign and a trial hotline for SMEs, both to the needs of its key stakeholders. It will also have established relationships with those stakeholders and made them aware of the project's activities. It will have created knowledge of the current reception of the GDPR among SMEs, their interaction with DPAs and identified gaps that the project's work must address. |

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| **II. Description of the work (activities)**  Be specific, give a short name for each activity and number them.  Indicate for each activity the partner, who will be responsible for its implementation. | | |
| No. | Name and description of the activity | Partner |

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| 2.1  2.2  2.3 | The PHAEDRA I, PHAEDRA II and STAR consortia have already established excellent contacts with all EU DPAs during the past four years of these projects’ duration. NAIH, as a Hungarian DPA, is an active part of the network of EU DPAs. VUB-LSTS is frequently collaborating with SMEs and their umbrella organisations. The STAR II consortium will take full advantage of these contacts. We will build on that recognition to learn the DPAs efforts to raise awareness among SMEs and SMEs’ early experience with the GDPR. Because we are so well known to DPAs and maintain good contacts with SMEs, they are forthcoming with us and share their views willingly, which is an indispensable component for the development of relevant and useful training material. The interim results of the EU co-funded STAR project (1 Nov 2017 to 31 Oct 2019) will be taken into account wherever possible.  **DPAs’ efforts to raise awareness among SMEs [M1-M6]**  The purpose of the semi-structured interviews is to gather the views and experience of European DPAs on their efforts, best practices, gaps, problems, uncertainties, needs and wishes to raise awareness with regard to the data protection framework among SMEs, before and after the GDPR entered into force (with special attention to the utilisation of hotlines). DPAs will be interviewed with regard to the challenges they face, their responses and the needs they have with regard to giving full effect of the EU data protection reform package. They will also be asked to confirm their interest in the scope of STAR II and to solicit their views, requirements and information with regard to the various awareness-raising and supporting tools planned in STAR II. Interviews will be aimed at gathering DPA views and expectations concerning awareness-raising, examples of best practice and measures they already deployed. The interviews will also help to define the strategic approach of DPAs to raising awareness in light of the national context in which they operate. TRI will prepare an interview protocol “script” which will serve as the template for the interviews. It will consult with the other STAR II partners and support their conduct of the interviews, taking advantage of the linguistic diversity in the consortium where necessary. The interviews will comprise a set of questions aimed at eliciting information needed to feed into or provide the basis for future Work Packages and activities. From the interviews, the consortium expects to deepen and clarify the scope of awareness-raising and assistance required for implementation of the EU data protection reform package, as well as establish the state of the art in the field of awareness-raising amongst SMEs. As the result of this activity a report will be developed containing a critical review of the activities of DPAs and identified good practices regarding awareness-raising among SMEs.  [**@DBW:** include also desk research here]  **SMEs’ experience with the GDPR [M1-M6]**  Similarly to activity 2.1, the consortium will contact at least 50 SMEs and gather their views on the new regulatory framework via semi-constructed interviews. The interviews will focus on SMEs biggest concerns, their level of awareness, their impressions about the GDPR, level of engagement with external assistants (e.g. through trainings, DPO organisations, DPAs, etc.) and on the mapping of their needs. Contacting them will also help the consortium to assess their level of knowledge regarding data protection and their willingness to change that. Existing surveys (including industry and academic research) of how aware SMEs and the public are about the GDPR will be also identified and analysed. [include also desk research here]  **First validation workshop (W1; Dublin) [M6]**  Once the information gathering processes and the interviews will be concluded, a workshop will be organised with the participation of the representatives of DPAs and SMEs, with a view of their validation. The outcomes of the workshop and the new experience, will be used to prepare the content and details of the awareness-raising campaign and the hotline. | All  All  All |

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| **III. Deliverable(s) of this Workpackage**  List the deliverables to be produced by this Workpackage.  Deliverables of your planned activities can be **intangible** (e.g. conferences, seminars, trainings, events, professionals trained) **and tangible** (manuals, reports, leaflets, webpages, articles, training material packages, books). Limit their number and do not include minor sub-items or internal working papers. Indicate the language(s) in which your activity is organized and nationalities of the participants.  Be specific as to the scope and level of ambition and use a quantitative description where applicable, e.g.: X regional seminars; X participants. | | | |
| No. | Deliverable | Characteristics  (e.g. for meetings/trainings: number of participants)  (e.g. for publications, documentation: format (printed/electronic); language) | Target group |

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| 2.1  2.2  2.3 | DPAs’ efforts to raise awareness among SMEs  SMEs’ experience with the GDPR  A report from the first Validation Workshop (Dublin) | Project scope delineation and relevance, with regard to its intended recipients’ experience and needs, will be warranted through initial interviews and continued dialog with DPAs. Project relevance also to be validated through the EAB.  Project scope delineation and relevance, with regard to its intended recipients’ experience and needs, will be warranted through initial interviews and continued dialog with SMEs. Project relevance also to be validated through the EAB.  Summary of the first workshop with the stakeholders which aims to validate the deliverables and materials produced under WP2. | | | | DPAs  SMEs  DPAs and SMEs | |
| **IV. Milestones for the Workpackage** | | None. | | | | | |
| **V. Critical risks for the Workpackage** | | XXX | | | | | |
| **VI. Estimated cost of this Workpackage by cost category** | | A – Direct Personnel Costs | B1 – Direct Travel Costs | B2 – Direct Subsistence Costs | C – Direct Costs of Subcontracting | | E – Other Direct Costs |
| 84 250 EUR | 4 000 EUR | 2 000 EUR | 0 EUR | | 0 EUR |
| **VII. Estimated human effort required for this Workpackage** (in person /months)**:** | | 15 person/months | | | | | |

| ⮞ Workpackage 3: Title: Hotline & awareness-raising campaign for SMEs | |
| --- | --- |
| Duration in months: **18** | Leading partner: **NAIH** |
| **I. Objective(s) of this Workpackage** | |

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| The establishment and running of a trial awareness-raising campaign for SMEs and the establishment and running of a trial hotline for SMEs. The campaign aims to reach out to SMEs to raise their awareness regarding the GDPR and that DPAs provide assistance. The hotline will build on this campaign and for 12 months it will respond to SMEs’ questions, assist them in compliance with the GDPR. Partners will monitor the hotline’s functioning and collect statistics and information of satisfactoriness thereof. This knowledge will form a basis for a guidance for DPAs and a handbook for SMEs. |

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| **II. Description of the work (activities)**  Be specific, give a short name for each activity and number them.  Indicate for each activity the partner, who will be responsible for its implementation. | | |
| No. | Name and description of the activity | Partner |

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| 3.1  3.2  3.3  3.4  3.5  3.6 | **Establishment of the awareness-raising campaign [M7-M8]**  Based on the information gathered in Activities 2.1 and 2.2, the partners will define the texts and scenarios of the proposed awareness-raising campaign via radio ~~and television~~ spots. Partners will explore the relevance of other platforms as well. The texts and scenarios will be first drafted in English and published online to be used by other DPAs as well; subsequently they will be translated into Hungarian. After the finalisation of the texts and scenarios, the radio ~~and TV~~ spots will be recorded. The communication channels (radio ~~and TV),~~ the length of the campaign (1 month), the frequency of broadcasting (two plus one spots per day) are based on the experience gained in the ARCADES project. A one-month-long campaign with 3 spots per day seems to be necessary and at the same time enough to deliver the message for a significant number of people. Therefore, NAIH requested bids/quotes from the Hungarian Media Service Support and Trust Fund (MTVA) on the expected costs of the recording and one-month-long broadcast. The awareness-raising campaign – with an estimated cost for the production of a spot of about 6 500 EUR) would target SMEs and it would concern the obligations of SMEs generated by the GDPR. The spot would be a short (max. 1-minute-long) advertisement, including animated elements, with a radio and television version as well.  **Running the awareness-raising campaign [M8-M10]**  The campaign will run in public media channels for approximately 1 month (preferably three times a day, once at prime-time). The radio spot will be broadcasted in Petőfi Rádió – a countrywide available public radio – which has the most listeners per day among the entire adult population in Hungary (1,882 million listeners – 22,9% (<https://www.radiosaleshouse.hu/news/Sajtokozlemeny.html>). ~~For a the TV spot, NAIH will negotiate with the MTVA and other commercial broadcasters to reach the widest audience.~~ The spots will run primarily between 06:00-18:00 as radio is often listened to at the workplaces. To advertise the campaign itself, representatives of NAIH will attend in various morning shows and radio programmes as well. NAIH expects that the campaign will further raise the target group’s awareness of the need to comply with the new data protection regime, encouraging them to take the necessary measures.  **Establishment of the hotline [M7-M8]**  Based on the information gathered in Activities 2.1 and 2.2, the partners willidentify best practices regarding hotlines (where they exist) and other practices aimed at raising awareness of SMEs about the GDPR. Physically, the hotline will be maintained at NAIH premises, who will provide the infrastructure (office, web interface, etc.) and the necessary workforce. As the hotline raises numerous issues, partners will create templates, policies, guidelines and code of conduct to address the legal and ethical concerns; to define the timeframe, work hours, and deadlines; and to set the conditions of assistance; the platforms of communication (primarily email but other platforms will be also made available); and to gather feedback from the SMEs via satisfaction surveys. Due to the similarities between their characteristics, the consortium expects to implement the main principles of the legal and ethical framework of legal clinics.  **Running the hotline [M9-M20]**  After the conclusion of Activities 3.2 and 3.3, a trial hotline will be deployed and run for a consecutive 12 months. This period will be sufficient to interact with SMEs, assist them to ensure compliance with the GDPR and gather valuable information about the difficulties they face. The hotline will be run primarily in English and Hungarian, but consortium members will assist NAIH in answering questions in other languages as well (including e.g. Italian, German, French, Dutch, Spanish, Greek, Polish, etc.). In parallel with the hotline, the consortium will create a two-to-four-page-long newsletters targeted at the news media to maintain or further increase SMEs awareness. The newsletter will feature blurbs about e.g. fines and penalties levied by DPAs, against whom and why; selected questions and cases in connection with the running of the hotline; and condensed education materials [re-write: don’t start with negative info!!!]. The newsletter will be sent out to the project’s media contact list on a bi-monthly basis. The aim of the newsletter is to stimulate the interest of journalists and SMEs in the GDPR and in getting them to write stories for SMEs in connection with the GDPR.  **Continuous monitoring of the hotline [M9-M20]**  The functioning of the hotline, the issues faced and questions answered will be continuously monitored by TRI and VUB, both qualitatively and quantitatively. The former process will focus on the demand for and effectiveness of the hotline service and resource, with special attention to the structural performance (as a validation of activity 3.3), to the content of the work (cases, nature of questions, difficulty of problems, etc.) and the satisfactoriness of the outcomes. This will be measured via satisfaction surveys. The latter, quantitative monitoring will be comprised of a statistical analysis of the functioning of the hotline (frequently appearing issues, level of difficulty, number of issues, statistical data of contacting SMEs, number of received and solved cases, used languages, geolocation information, etc.). Based on the monitoring activities, the functioning of the hotline will be periodically refined and adjusted to the needs.  **Second validation workshop (W2; Dublin) [M20]**  Once the awareness-raising campaign and the operation of the hotline will be concluded, a workshop will be organised with the participation of the representatives of DPAs and SMEs, with a view of their validation. The outcomes of the workshop and the experience from awareness-raising campaign and the still running hotline, will be used to prepare the guidance for DPAs and the handbook for SMEs. | NAIH  NAIH  All  NAIH  TRI, VUB  All |

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| **III. Deliverable(s) of this Workpackage**  List the deliverables to be produced by this Workpackage.  Deliverables of your planned activities can be **intangible** (e.g. conferences, seminars, trainings, events, professionals trained) **and tangible** (manuals, reports, leaflets, webpages, articles, training material packages, books). Limit their number and do not include minor sub-items or internal working papers. Indicate the language(s) in which your activity is organized and nationalities of the participants.  Be specific as to the scope and level of ambition and use a quantitative description where applicable, e.g.: X regional seminars; X participants. | | | |
| No. | Deliverable | Characteristics  (e.g. for meetings/trainings: number of participants)  (e.g. for publications, documentation: format (printed/electronic); language) | Target group |

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| 3.1  3.2  3.3  3.4 | Report on the awareness-raising campaign  Report on the hotline  Report on the statistics and efficiency of the hotline  Second validation workshop (Brussels) | Summary of the establishment and broadcast of materials, texts, furthermore public appearances, events and available statistics, with special attention to the reached audience.  Summary of the establishment and running of the hotline, including the infrastructure, policies, internal guidelines, difficulties and lessons learned during the operation.  Report based on satisfactory surveys and statistical analysis of the operation with special attention to the number and nature of issues, frequency of contacts, response time, effects of awareness-raising campaigns and public appearances, etc.  Summary of the second workshop with the stakeholders which aims to validate the deliverables and materials produced under WP3. | | | | DPAs, SMEs  DPAs and SMEs  DPAs and SMEs  DPAs and SMEs | |
| **IV. Milestones for the Workpackage** | | MS3 – Launch of the awareness-raising campaign (M7)  MS4 – Launch of the hotline for SMEs (M7) | | | | | |
| **V. Critical risks for the Workpackage** | | XXX | | | | | |
| **VI. Estimated cost of this Workpackage by cost category** | | A – Direct Personnel Costs | B1 – Direct Travel Costs | B2 – Direct Subsistence Costs | C – Direct Costs of Subcontracting | | E – Other Direct Costs |
| 124 500 EUR | 4 000 EUR | 2 000 EUR | 0 EUR | | 42 000 EUR |
| **VII. Estimated human effort required for this Workpackage** (in person /months)**:** | | 23 person/months | | | | | |

| ⮞ Workpackage 4: Title: Guidance for DPAs & handbook for SMEs | |
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| Duration in months: **12** | Leading partner: **VUB-LSTS** |
| **I. Objective(s) of this Workpackage** | |

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| Development, testing and validation of a digital guidance for DPAs on awareness-raising for SMEs, and a printed and digital handbook for SMEs on EU personal data protection law, based upon the requirements, demands and experience, previously collected during the state-of-the-art analysis and the functioning of the hotline and the awareness-raising campaign. Based on validation workshops these materials will be refined, in response to end-user feedback, and it will be ensured that they fit for their purpose and provide added value. |

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| **II. Description of the work (activities)**  Be specific, give a short name for each activity and number them.  Indicate for each activity the partner, who will be responsible for its implementation. | | |
| No. | Name and description of the activity | Partner |

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| 4.1  4.2  4.3  4.4 | **Draft versions of the guidance & handbook [M13-M16]**  The guidance for DPAs on how to establish and run a hotline targeting SMEs and the handbook for SMEs explaining the basics of data protection law and the GDPR will be developed under this activity.  Based on the knowledge gained through the project’s main activities (most notably, the information gathering process, the awareness-raising campaign and the running of the trial hotline) and the interaction with DPAs and SMEs throughout the project (via interviews, surveys, validation workshops, etc.) two documents will be produced:   * A guidance for DPAs to run a hotline for SMEs, containing *inter alia* good practices for raising awareness and responding to questions of SMEs about the GDPR; guidance to set up and run a hotline (with special attention to the required infrastructure, engaged personnel, internal policies, legal implications and ethical considerations); a detailed set of use cases, problems and solutions thereof. * A handbook for SMEs explaining the basics of data protection law and the GDPR, through illustrations, practical examples, templates and contacts for better understanding and easy utilisation. With such handbook, SMEs will be able to get accustomed with the basics of data protection law and the GDPR, implement it into their own practices and identify potential compliance issues. The handbook will predominantly reflect and build on the issues raised in Activity 3.4.   **Validation workshop (W3; Brussels) [M17]**  Once the guidance and the handbook have been developed in Activity 4.1, a workshop will be organised with the participation of the representatives of DPAs and SMEs, with a view of their validation. The outcomes of the workshop and the new experience from the still running hotline, will be used to finalise the two documents.  **Final versions of the guidance & handbook [M17-M24]**  Based on the outcomes of the validation workshop and the hotline, the guidance and the handbook will be refined and finalised. Subsequently, the guidance for DPAs will be published online and made available for the EU DPAs under a copyright-unrestricted licence, making it possible to adapt and translate, should the need be. The handbook for SMEs will be printed in 5000 copies and distributed among partners, involved DPAs and SMEs and further stakeholders.  **Launch event for the guidance & handbook (W4; Budapest) [M23]**  As a further awareness-raising activity, at the end of the project, the two developed documents will be introduced and promoted in an open event. | All  DPAs and SMEs  All  DPAs and SMEs |

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| **III. Deliverable(s) of this Workpackage**  List the deliverables to be produced by this Workpackage.  Deliverables of your planned activities can be **intangible** (e.g. conferences, seminars, trainings, events, professionals trained) **and tangible** (manuals, reports, leaflets, webpages, articles, training material packages, books). Limit their number and do not include minor sub-items or internal working papers. Indicate the language(s) in which your activity is organized and nationalities of the participants.  Be specific as to the scope and level of ambition and use a quantitative description where applicable, e.g.: X regional seminars; X participants. | | | |
| No. | Deliverable | Characteristics  (e.g. for meetings/trainings: number of participants)  (e.g. for publications, documentation: format (printed/electronic); language) | Target group |

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| 4.1  4.2  4.3  4.4 | Draft versions of the guidance & handbook  Third validation workshop (Dublin)  Finalised guidance & handbook  Launch event for the guidance & handbook (Budapest) | Guidance for DPAs to establish hotline for SMEs and handbook for SMEs to get accustomed with the foundations of EU data protection law and the GDPR. The guidance will contain lessons learned from the establishment and running of the hotline. The handbook will include *inter alia* use cases, templates, reading materials, guidance and a compliance checklist.  Summary of the third workshop with the stakeholders which aims to validate the deliverables and materials produced under WP4 .  Finalised versions of guidance and the handbook. The guidance will have only a digital version, but the handbook will be printed in 5000 copies.  Summary of the launch event of the guidance and the handbook. | | | | EU DPAs and SMEs  EU DPAs and SMEs  EU DPAs and SMEs  EU DPAs and SMEs | |
| **IV. Milestones for the Workpackage** | | MS5 – Validation of the draft guidance & handbook [M16]  MS6 – Printed handbook and digital guidance [M24] | | | | | |
| **V. Critical risks for the Workpackage** | | XXX | | | | | |
| **VI. Estimated cost of this Workpackage by cost category** | | A – Direct Personnel Costs | B1 – Direct Travel Costs | B2 – Direct Subsistence Costs | C – Direct Costs of Subcontracting | | E – Other Direct Costs |
| 113 000 EUR | 7 500 EUR | 2 500 EUR | 0 EUR | | 15 000 EUR |
| **VII. Estimated human effort required for this Workpackage** (in person /months)**:** | | 18 person/months | | | | | |

| ⮞ Workpackage 5: Title: Dissemination and outreach | |
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| Duration in months: **24** | Leading partner: **TRI** |
| **I. Objective(s) of this Workpackage** | |

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| Creating awareness, encouraging uptake and use of the guidance and handbook developed under the STAR II project through dissemination, communication, outreach and awareness-raising methods. |

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| **II. Description of the work (activities)**  Be specific, give a short name for each activity and number them.  Indicate for each activity the partner, who will be responsible for its implementation. | | |
| No. | Name and description of the activity | Partner |

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| 5.1  5.1.1  5.1.2  5.2  5.3 | **Create and keep up to date the project communication tools [M1-M24]**  **Create and expand the project’s website [M1-24]**  The consortium will continue using the existing website of the STAR project (<http://www.project-star.eu)>, subject to necessary amendments, e.g. a clear separation of materials for different audiences.  The website will be used as a focal point of reference for STAR II project purposes, with special attention to information of and access to the hotline. A member-only area will be incorporated therein, where DPAs, SMEs and other authorised stakeholders will be able to download the materials developed by STAR II (draft versions). Updates and project activities, as well as information about the consortium, will be included in the website. In addition, the existing STAR communication tools (social media accounts) will be used in STAR II too. The website will also include a news section for regular updates about the project, including key events and releases. Eventually, on this website, the final version of the guidance and the handbook as well as other relevant resources will be made publicly available for free under an appropriate open access licence.  **Maintain the project’s communication tools (social media accounts) [M1-M24]**  Social media accounts for the STAR II project will be created in all platforms deemed necessary by the consortium (based upon previous experience, LinkedIn, Twitter and Research Gate are the prime targets). They will be updated and regularly maintained, in order to increase visibility, report findings and project developments, create awareness of downloadable material (wherever applicable) and achieve maximum dissemination of project results.  **Journal articles and trade press articles [M21-M24]**  The partners will prepare at least one article for peer-reviewed journals, regarding some of the issues addressed in the STAR II project, particularly the maintenance of a hotline for SMEs and education materials for SMEs developed under WP4. If suitable, the partners will seek to publish in journal(s) that have open access arrangements. Potential journals that could be targeted include *International Data Privacy Law* (Oxford University Press), *Computer Law & Security Review* (Elsevier), *International Journal of Training and Development* (Wiley), *International Journal of Public Sector Management* (Emerald) and the *Journal of Small Business and Enterprise Development* (Emerald). The partners will also provide articles on the project and the project's developed training materials for the privacy and data protection (and broader IT law) trade press, for example, *Privacy Law and Business* and *The Register*.  **Distribution of the guidance and handbook among EU DPAs, SMEs and other stakeholders [M22-M24]**  In addition to open-ended communication with all interested parties in the STAR II project, direct communications with all EU DPAs, SMEs and other stakeholders identified under Activities 2.1 and 2.2 will be undertaken after finalisation of the guidance and the handbook. These communications will alert recipients on the availability of such materials, will provide instructions on their recommended use, as well as provide methods of accessing them (download links or other, as appropriate). | VUB  VUB  VUB  TRI  VUB |

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| **III. Deliverable(s) of this Workpackage**  List the deliverables to be produced by this Workpackage.  Deliverables of your planned activities can be **intangible** (e.g. conferences, seminars, trainings, events, professionals trained) **and tangible** (manuals, reports, leaflets, webpages, articles, training material packages, books). Limit their number and do not include minor sub-items or internal working papers. Indicate the language(s) in which your activity is organized and nationalities of the participants.  Be specific as to the scope and level of ambition and use a quantitative description where applicable, e.g.: X regional seminars; X participants. | | | |
| No. | Deliverable | Characteristics  (e.g. for meetings/trainings: number of participants)  (e.g. for publications, documentation: format (printed/electronic); language) | Target group |

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| 5.1  5.2  5.3  5.4 | STAR II on-line communication tools (website, social media accounts)  Journal article  Press releases  Trade press articles | Contemporary website – including landing page, introduction to the project, contact details, social media links, deliverables and publications, links to other DPAs and SME organisations, blog, downloads area for hosting the guidance and the handbook. Content in English. LinkedIn, Twitter and Research Gate accounts for STAR will continue to be used in STAR II; they will be updated across the lifespan of the project with announcements, key events, available material.  Article in a peer-reviewed academic journal, English.  Three press releases in English, distributed to relevant trade press. At project launch, when draft versions of training materials are available, and when final versions are available.  Two trade press articles (at least one in English, one in Hungarian) prepared. One at launch, the second in the dissemination phase. | | | | EU DPAs, SMEs, privacy and data protection professionals in the EU & beyond.  Privacy and data protection experts, SMEs.  EU DPAs, SMEs.  DPOs and privacy practitioners. | |
| **IV. Milestones for the Workpackage** | |  | | | | | |
| **V. Critical risks for the Workpackage** | | XXX | | | | | |
| **VI. Estimated cost of this Workpackage by cost category** | | A – Direct Personnel Costs | B1 – Direct Travel Costs | B2 – Direct Subsistence Costs | C – Direct Costs of Subcontracting | | E – Other Direct Costs |
| 46 250 EUR | 0 EUR | 0 EUR | 0 EUR | | 0 EUR |
| **VII. Estimated human effort required for this Workpackage** (in person /months)**:** | | 8 person/months | | | | | |

# Part 3 – Information concerning other grants / procurement

3.1 Grant applications or offers submitted under other grants/procurement procedures by the applicant to the EU institutions in the current year.

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| --- | --- | --- | --- | --- | --- |
|  | Year | EU Programme | Reference number and title | Applicant/  Partner | Amount  (Euro) |
| 1 | 2018 | *None.* | n/a | n/a | n/a |

3.2 EU Grants or contracts awarded to the applicant in the last 4 years.

Any project or contract that has been awarded funding from a European institution in the last 4 years should be listed. This includes awards under grants/procurement procedures.

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|  | Year | Name of EU programme | Title and reference of project (if applicable) | Amount received by applicant during the year of the latest certified accounts | Total amount of award[[1]](#footnote-1) | Project webpage |
| 1 | 2017 | REC-RDAT-TRAI-AG-2016 | 769138 **STAR** (Support Training Activities on the data protection Reform) | XXX | € 283,439.46 | [www.project-star.eu](http://www.project-star.eu) |
| 2 | 2014 | JUST/2013/FRC/AG | 6132 **ARCADES** (Introducing Data Protection And Privacy issues at schools in the EU) | XXX | € 230.194,45 | [www.arcades-project.eu](http://www.arcades-project.eu) |

1. If the funding was awarded to a partnership, only the amount awarded to the applicant should be noted. [↑](#footnote-ref-1)