**Interview with the representative of the French DPA (CNIL), Albine Vincent**

**23 March 2018**

1. **Do you offer some training on the GDPR now? If not, are you planning to develop training packages in the future? If yes, please describe the proposed structure and main elements of the packages.**

Yes. we don’t call our activity training – the accurate translation is workshop. when we are more than 50 persons in a room, we consider it more like a workshop or conference rather than a training. Very interesting for DPOs to understand, to participate, to listen to these kinds of trainings. We provide these workshops for 10 years for DPOs because in France the controllers can (not mandatorily) designate a DPO. We are 7 people at CNIL in the respective department to help DPOs and assist them in their activities. We help them in form of workshops. We have 1000 people a year that come to CNIL premises to participate in our workshops. The workshops last 1 day and there are several subjects. Basics of data protection, health issues, security issues, HR issues, public body issues, etc. These are the main subjects. We organise around 30 workshops per year. We don’t make workshops during vacations. There is a constant demand and satisfied demand. We can’t go to other places, thus everyone has to come to CNIL (we don’t have the human and financial resources to provide these workshops online or outside CNIL premises).

1. **To whom do you offer that training (e.g., DPA employees, lawyers, judges, civil servants, general public)? Do you provide training to DPOs as well?**

The audience is dedicated to the DPOs. But open also for people who want to be DPOs. You have to be appointed or close to be appointed. You have to fill in an online administrative form to get connected with the workshop. If you designate a DPO you have dedicated tools to assist them. We are about to offer certification. We want to regulate what we see in the landscape of trainings so maybe in 2-4 weeks we are about to communicate through a public consultation (April-May) in order to finalize the certification for DPOs.

1. **What is the scope of the GDPR training you provide? What topics or issues do you cover?**

What issues we do not cover might be a better question here. When we organize a GDPR session we present everything. The question is how deep we touch the issues. We cannot develop everything so we present a more basic view. The new obligations for controllers and processors, what is a DPO, new responsibilities of the controllers, DPIA, data breach notification, sanctions, material and territorial scope. information about all the new data subject rights and we have a specific workshop for DPIA. We have several levels. The first level is the basics of the GDPR. One day and we present everything about the GDPR. What is new, what is different. Then, you can go deeper in the subject with another kind of workshop, e.g. re DPIA or security issues. These are what we have now. In the last 2 years we developed and changed the content in order to support and give information step-by step to our audience.

1. **Please describe the type of training with special attention to its attributes, such as form of contact (online, face-to-face, etc.), size of groups, length of sessions, length of the whole training, evaluation process, further trainings, etc.**

We have no evaluation process (since it’s a workshop). It’s a face-to-face- event. Last time though we had 300 attendees. Before that only 50 in a room. We organized 10 little groups to work and make a DPIA in live to understand how to make it. It was a constructive way to understand the tips, keys to be efficient when you have to make a DPIA. The length of the session is 1 day. 9:30-17:00 with 1-hour lunch break. Whether it is enough or not – hard to answer. Depends whether you can train yourself in your professional time, etc. I don’t think this 1-day workshop is enough. The examples we give, the questions of the audience the discussions thereafter are very useful but I wouldn’t say it’s enough. But it also depends on your professional background.

1. **What are three topics you consider most important for trainees?**

Basics of the GDPR, security issues with all the pseudonymization and anonymization of data and DPIA.

1. **What kind of materials do you currently use for your training activities (slides, brochures, essays, books, case studies, legal materials etc.)? Would you be willing to share with us some of your current training materials for best-practices-identification purposes (even materials addressing the directive)?**

Most of the materials are slides but we have other tools on the website, guide to prepare for GDPR - 6 steps, we also have an open-source DPIA tool. During the presentation we have slides but we often go to our website to show and share our available content. We also use those materials actively during the sessions.

1. **Do you gather feedback on your training courses or training materials? How do you gather such feedback (e.g. online questionnaires, paper questionnaires, e-mail)? Based on the feedback you’ve received, what do you think would be the most effective way to provide training (e.g. webinars, videos, workshops, online courses, etc.)? What types of materials would you create?**

We have paper questionnaires regarding the feedback. They are quite precise so we can have information about the premises, the sound, the light, the person the content the speed the length, everything. Now we use another electronic form. The feedback is always the same. Even when the audience is different. People arriving in the data protection field or experts with decades of knowledge. It’s hard for us to present the concept of data protection and satisfy everyone in the room. I think the more feedback we have the more we will be able to satisfy our audience. It is very interesting to propose different levels of content. You can not train people in the same way through a digital device or live. you can present during hours face-to-face but through a digital platform it’s impossible. You need to maintain interest. Optimally, I would have a bunch of this content and tools. personal presentation more for experts or representatives of sectors – train the trainers. It’s more for experts or a small group of persons. Regarding digital tools – you can stop and continue to listen and understand the subject and also webinars are very interesting because you can have participation during the webinar and also share all the content – like a library of content with a short presentation. You can share with all the people.

1. **What variety of training level do you consider appropriate (e.g., general overviews vis-à-vis specialised training on selected issues, etc.)? Why?**

Depends on the length and on many other things.

1. **How long do you think training sessions should last (e.g. an hour-long webinar or a half-day workshop)?**

If it’s a webinar 30 minutes max and 15 minutes of questions and discussion because you don’t have time. For the face-to-face – if you as a trainee are outside your premises or outside work you can spend the whole day. The place of the training also matters. If the venue is far from your place you can have the whole day there – you won’t be disturbed by your work.

1. **According to your observations and expertise what would you suggest keeping in mind when preparing the STAR training materials?**

Many aspects – the ability to reuse the content. Not only for DPOs but also for the employees of the company. Materials for internal use would be very interesting. Another aspect is to use examples, solutions and real cases. Give solutions to highlight some links with content - directing to templates, guidelines, etc. Also probably a to-do-list and action points. We have a hotline, workshops, we give legal and technical advice through these platforms as well.

1. **Would you be willing to test the training materials in actual training sessions (in later stages of the project)?**

Yes.

1. **We aim at identifying best practices and evaluate existing training materials on the following criteria: comprehensiveness, suitability, coherence with the regulatory environment, delivery quality, certification, cross-border relevance, accessibility. Do you consider these criteria as appropriate for a proper assessment of best practices? Are there any other criteria you would recommend for consideration?**

I think these points are good – whether they are enough, it should be checked.

1. **As I mentioned at the beginning, the EU is funding the STAR project the aim of which is to develop training materials that DPAs and DPOs can use in providing training to their stakeholders. To what extent would DPAs need or could benefit from harmonised training materials?**

I think it is very wide already. The benefits are the matter of trust. I think you will have always national examples to give because the national legal frameworks cannot be avoided, especially for particular areas like health, police, HR. Most of these are national issues. harmonization will be hard in some areas.

1. **Would you be willing to participate in further interviews, should they be necessary?**

Yes.

1. **Do you wish to add anything?**

DPO guidelines by the art 29 WP should be considered as well. The trainings of DPOs and employees should be dealt with.