**Interview with the DPO of University of Pécs, Gergely László Szőke**

**23 February 2018**

1. **Does your organisation provide 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.**

We do not have at the moment, but we are planning to make one. The whole plan has been created, but the details are yet unclear. Our targets would likely be the leaders and assistants of the major data processors. What is important now at the University – besides the GDPR – is what the current data protection act (Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information) changes into, how the national regulation will relate to GDPR. This is not clear yet. In addition the sectoral regulation is also important, because the daily data handling is still regulated by the Act of Higher Education in Hungary (Nftv. <http://njt.hu/cgi_bin/njt_doc.cgi?docid=142941.329824>). So this would be a training with a lot of different topics, obviously about the changes coming with the GDPR. I think teaching article by article would be pointless, only those which are to be applied directly.

1. **Does your organisation offer that training to everyone in your organisation? If not, who is the target audience (please define the audience and the reasons thereof)?**

Once we have already tried with everyone who was involved in data processing in any given level or form, it did not really work out, thus the target group should be the leaders and their assistants, although we do not want to exclude anyone. This means anyone can enrol this training, but it would be aimed more at the target group. This is important, just based on the capacity of the University: there are 6600 employees on the University from which 4000 surely comes into contact with personal data. We have no room with enough space for so many people. So the target group would be the middle level data processors with the power of decision making. In addition this could be catered to the needs of individual units.

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.**

I think one part would surely be contact lessons, there seems to be a demand to that, but maybe this will be just 2 times, 1,5 hours of a lesson. The way I see the content of the new regulation on the University will not change much, because it was already defined by the national regulation. That is why there will be no serious changes in the daily routine, rather just more administration. The aim of training is not to teach the material but to teach the more sensitive changes that are coming with the GDPR. I would be glad, if there would be a good e-learning material and an e-learning platform. It would not be as effective as the contact lessons, but it would be useful regardless. In mid-term there is a chance for this, but in short-term not, because it simply takes too many resources. The e-learning development is a significant step, the European Commission also supports this with a lot of money. If there were any material, it would surely be used.

The size of the groups depends on the different target groups, but differentiation based on the topics is also a possibility – for example the Marketing Department and the Student Department would be given different trainings. So the size of the group would also be dependent on the size of the department. But I think these would not be small groups, but more like between 20-100 people, depending on the size of the department, for each one day 2 times 1,5 hours.

So first the general regulation, then the department specific part. The whole training will be long, but for each target group not at all, because it would take up a lot of their time. I can imagine it being regular (e.g. in each semester). I do not plan any examination, the leaders do not like that, and its methods still need to be fleshed out. But with the e-learning I can imagine. If it happens to be automatic and they receive the result immediately, that would be interesting for them as well, also easier for the teacher. But I think any form of oral or written examination would not be possible.

Such evaluation could be an option, not like an exam but more like a feedback. Very much depends on our capacity, but there needs to be something. Maybe that the training could be periodic based on certain rotations.

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

We have already answered that in the previous questions. The new things with the GDPR, they should hear about data-protection impact assessment, notification of a personal data breach, etc.

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

The new things about the GDPR, which were non-existent until now. Otherwise there are not much, most of it was already the same before in Hungary. Another hot topic could be the data processing system of the University. The third topic would be e.g. the marketing part or focusing on the camera system and what to do with them. I can imagine this way: first about GDPR and general data protection, then the data processing system of the University and the third part is very specific. The target group is interested what to do in case of data breach or are they given sample document about the cameras.

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)?**

There is no training currently, so there is no material currently either.

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?**

It depends. In case of e-learning it would be obviously online. It would be useful not to let the trainee the platform until this feedback is filled. In case of contact lessons paper-based feedback would be more useful, but it can be done through e-mail as well.

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

I think it should be specialized, catered to certain target group, but filled with general information too. The training should focus on both, because without general knowledge special rules cannot be understand.

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

In case of contact lesson 2 times 1,5 hours and in addition an online course.

1. **Are you aware of any other organisations offering training on the GDPR? Is it free or does it cost?**

I know about some programs which can be accessed by anyone, but not about an internal training. But I do not know how other universities deal with this. Otherwise training which can be accessed by anyone are not free.

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

New things coming with the GDPR are necessary and maybe its effects for certain organizations. Examples from practise would especially good, e.g. about the accountability principle. In addition emphasizing the important parts could be good, e.g. data breach which is only a few articles in the GDPR, but very important.

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

I could only test it if I can access it in Hungarian, because I would not be able to translate it from English, I will not have the capacity for that. But I can give feedback.

1. **Do you have contacts with DPO association in other Member States? If yes, could you please provide us their contact?**

No.

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

Yes.

1. **Would you like to suggest someone whom we should interview in particular?**

Not at the moment but I will share later.

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?**

It would foster the unified understanding of data protection law not only in a country but also on an EU level.

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

Will send the contacts I referred to earlier.