



STAR

SUPPORT TRAINING ACTIVITIES ON THE DATA PROTECTION REFORM
project-star.eu

First coordination meeting

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Background to the STAR project

The STAR project (*Support Training Activities on the data protection Reform*) will provide support to the training activities of European Union (EU) Data Protection Authorities (DPAs) and data protection officers (DPOs) on the EU data protection reform, especially the General Data Protection Regulation (GDPR). The GDPR requires these two categories of data protection actors to undertake training activities (Arts 57(1) and 39(1)(b)). Each DPA developing such materials in isolation increases the overall cost, risks undermining the harmonising effect of the GDPR and puts greater pressure on its consistency mechanisms. STAR will thus provide them with necessary and efficient training materials and resources. In particular, STAR will:

- 1) formulate the training topics in close cooperation with stakeholders,
- 2) author the actual training materials,
- 3) validate and test them in pilot trainings.

This output will be freely and publicly available in a digital form. STAR is directly addressed to EU DPAs and DPOs; it also offers a benefit to other privacy professionals in the EU and beyond.

STAR supports the legal obligations of DPAs and DPOs to undertake training activities and, in order to facilitate their work, will provide them with ready-made, easy-to-customise and easy-to-run training materials, easily adaptable to specific training situations. STAR will also provide to the European Data Protection Board (EDPB) the common training programmes (Art 70 GDPR). The main outputs are thus the training materials and resources themselves. While their exact format and nature will be refined in cooperation with stakeholders, the following will at least be included:

- 1) Training scenarios for each training category,
- 2) A Seminars' Topics List, based on the training scenarios,
- 3) Seminar Material for each one of the seminars,
- 4) Webinars (selected from the Seminars' Topics List),
- 5) A training Handbook,
- 6) A takeaway reference GDPR checklist,
- 7) A ten-point GDPR introductory list.

Executive summary

This deliverable presents the minutes of the first two coordination meetings, held in M3 (15 January 2018) and M6 (27 April 2018). The meetings were necessary to align the work of the partners during the first main stage of the project (conducting interviews with stakeholders, mapping, assessing the state of the art of the existing training materials and identifying the needs of stakeholders to be addressed in the STAR training materials), furthermore to discuss the general requirements and specificities of the deliverables in Work Package 2.

List of Abbreviations

STAR	Support Training Activities on the data protection Reform
DPA	Data Protection Authority
DPO	Data Protection Officer
EAB	External Advisory Board
GDPR	General Data Protection Regulation

1 Minutes from the first coordination meeting

1.1 Date and place

Date:

Monday, 15 January 2018, from 15:00 till 15:30

Place:

Teleconference via Skype

1.2 Participants

- 1) **István Böröcz**, Vrije Universiteit Brussel (VUB) – Research Group on Law, Science, Technology & Society (LSTS)
- 2) **David Barnard-Wills**, Trilateral Research Limited (TRI)
- 3) **Filippo Marchetti**, Trilateral Research Limited (TRI)
- 4) **Gábor Kulitsán**, Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)

1.3 Minutes of the meeting

▪ Agenda item 1 - Opening remarks and the adoption of the agenda

The meeting was chaired by István Böröcz (VUB-LSTS). After preliminary remarks and the introduction of the participants, he invited participants to provide comments on the agenda, if any. No issue was raised, so the agenda was adopted.

▪ Agenda item 2 - the External Advisory Board

After the kick-off meeting partners started to engage experts to join the External Advisory Board of the STAR project. István briefed the partners that, according to previous internal discussions in November and in December, he collected the responses and suggestions of the partners regarding the composition of the EAB and after contacting the suggested members individually, on the 6th of January the External Advisory Board of the STAR project has been formally established. The members of the STAR EAB:

- Anna Johnston (Salinger Privacy)
- Attila Kiss (staff member at the Hungarian National Police Headquarters)
- Brendan van Alsenoy (legal advisor at the Belgian Data Protection Authority (CBPL-CPVP))
- Clara Guerra (International Service of the Portuguese DPA (CNPDP))
- Maria Michaelidou (staff member at the Office of the Commissioner for Personal Data Protection in Cyprus)
- Zsolt György Balogh (associate professor at Corvinus University Budapest)

The short biographies of the members have been published on the website of the project:

<http://www.project-star.eu>

▪ Agenda item 3 - Discussion on the design of materials for dissemination

The attendees discussed the design of the deliverable template. David stressed the importance of having the EU logo and the statement, saying “*The STAR project (Support Training Activities on the data protection Reform; 2017-2019) is co-funded by the European Union under the Rights, Equality and Citizenship Programme 2014-2020 (REC-RDAT-TRAI-AG-2016) under Grant Agreement No. 769138.*” on the front page of the deliverables. Gábor added that the language should be indicated as well.

▪ **Agenda item 4 - Discussion on the preparation to the interviews**

In M2 and the first half of M3 Trilateral developed 3 sets of questionnaires to gather the views of DPAs, DPOs and other stakeholders with training responsibilities (which have been submitted in M7 to the EC under D2.1 Questionnaires). Filippo elaborated on the importance and ways of gathering DPA views and expectations concerning trainings. He also emphasized the need to collect materials already deployed and used in the past. Partners went through the questions several times and after several corrections and modifications they agreed on the final version thereof. As the questionnaires were set, partners agreed that the work should proceed with the conduct of the interviews.

To help in the identification of the potential interviewees, Gábor shared an excel sheet containing the name, website and email address of DPAs and the respective contact persons, DPO associations, source of training materials in every EU Member State. Based on the excel sheet David and Filippo proposed an allocation of the countries among the project partners to carry out the interviews. Partners agreed on the date 15 March as the deadline to conduct the interviews. The drafts and the corresponding documents were put in the online repository.

▪ **Agenda item 5 - Other**

István shared the final version of the STAR logo with the partners and briefed them about the functioning of the online repository with special attention to the location of the server (VUB premises) and access rights (bound to authorization).

2 Minutes of the second coordination meeting

2.1 Date and place

Date:

Friday, 27 April 2018, from 14:00 till 16:00

Place:

Teleconference via Skype

2.2 Participants

- 1) **István Böröcz**, Vrije Universiteit Brussel (VUB) – Research Group on Law, Science, Technology & Society (LSTS)
- 2) **David Barnard-Wills**, Trilateral Research Limited (TRI)
- 3) **Filippo Marchetti**, Trilateral Research Limited (TRI)
- 4) **Gábor Kulitsán**, Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)

2.3 Minutes of the meeting

- **Agenda item 1 - Opening remarks and the adoption of the agenda**

The meeting was chaired by István Böröcz (VUB-LSTS). After preliminary remarks and the introduction of the participants, he invited participants to provide comments on the agenda, if any. No issue was raised, so the agenda was adopted.

- **Agenda item 2 - Discussion on the interviews**

Partners briefed each other about the conducted interviews with DPAs, DPOs and other stakeholders and shared their views on potential further interviews. Filippo said that the engaged stakeholders and corresponding numbers will be indicated in D2.2 Report on the findings of the interviews to illustrate the effectiveness of the cooperation with the stakeholders and the effectiveness of the interviews. They discussed the need to map the broadest set of industries/sectors in order to ensure the comprehensiveness of the training materials to be developed by the project. David emphasized that the GDPR is not the only binding law for data controllers in various sectors. Partners also stressed the importance of the critical review of the existing materials, but not only those which are provided by DPAs and are rather general in most cases but also those which focus on sector-specific issues.

Partners completed the address list with regard to stakeholders. Filippo asked István to contact the Project Officer regarding the actual content of D2.3 Contact lists, namely whether the European Commission requires the actual contacts of participants or only the description thereof.

- **Agenda item 3 - Discussion on the status of the deliverables due in M7**

Filippo and David briefed Gábor and István about the status of the deliverables due in M7 (by the end of May):

D2.1 Questionnaires was technically done. Just needed some finalizing but the content itself was set already in January (as the questionnaires were needed to conduct the interviews).

D2.2 Reports on the findings of the interviews was being written. Federico explained the following:

- Interviews have been carried out by every partner. Based on the allocation of countries partners contacted everyone and conducted the interviews with those who responded.

- The number of interviewees was overall satisfying and adequate to proceed with the analysis.
- The analysis had been done by Trilateral with the assistance of NAIH and VUB. Filippo shared an excel sheet with a set of criteria regarding the available training materials. The sheet was used by the partners to evaluate the training materials. More than 90 materials have been assessed, which provided a clear picture on the nature/depth/form/etc. of the materials.
- The preliminary findings had been identified and will form part of the deliverable.
- By the time of the teleconference the analysis was to be carried out.
- Preliminary feedback regarding the analysis had been sought. NAIH and VUB contributed to the analysis in forms of discussions and brainstorming with Trilateral.
- As there was no separate deliverable for activity 2.3 (maintain dialog with DPOs and other stakeholders) Filippo suggested to include the activities in D2.2 in a form of 'lessons learnt'. The others agreed.

D2.3 DPOs and other stakeholders contact list was a matter of question as partners didn't necessarily want to send the whole contact list but rather a description thereof (considering the principle of necessity). Partners agreed on contacting the PO prior to the submission of the deliverable for seeking her suggestions.

D2.4 List of training materials and associated report was being written as well. David proposed a list of aspects thereof to be discussed, such as:

- The structure of the deliverable. The partners discussed which structure would be the most optimal and reasonable for the deliverable. Eventually, they agreed on the inclusion of the following sections:
 - Guiding assumptions and general requirements for the training materials, which contains the findings of the interviews and the identified needs and preferences of the interviewees. This section would define the main principles and general requirements of the STAR training materials.
 - Definition of and agreement on the key topics of the training materials, based upon the results of the analysis of the interviews and the assessment of the existing training materials. After a lengthy discussion partners decided which are the most important elements of the General Data Protection Regulation (GDPR) and how to structure the training materials in order to cover the Regulation in the most comprehensive way. They discussed that the differences between the previous and current data protection regime are important only temporarily but the STAR materials will be developed for the future and for a longer use, therefore 'data protection' as such should be addressed in general instead of in a form of comparison. Partners also discussed the subtopics to be included as well as the rationale and additional considerations per topic. Furthermore, they agreed on need for case studies which could be added to each topic based on the identified and emphasized sectors. Additionally, sector-specific national laws could be listed in each topic as well (to allow trainers to find the most suitable case studies/legislation to their audience). The defined topics were the following:
 - Topic 1: Introduction to the European Union Data Protection Regime
 - Topic 2: Purposes and legal grounds for processing personal data
 - Topic 3: The rights of the data subject and their exercise
 - Topic 4: Responsibilities of data controllers and processors
 - Topic 5: The role of the Data Protection Officer
 - Topic 6: The role of the Data Protection Authority
 - Topic 7: Data protection in practice: Technical and organisational measures
 - Topic 8: Risk-based approach in the GDPR
 - Topic 9: Data protection impact assessments
 - Topic 10: Data protection communication
 - Topic 11: It's not just the GDPR - GDPR related laws and special provisions

Partners also discussed that in every session there should be a dedicated part which focuses on national and sector-specific rules.

- Training material specifications. Based on the findings of the interviews partners agreed on the preferred format of the materials, such as the format of the presentations, reading materials for participants, instructions for trainers and operational forms. They also discussed the possible inclusion of additional, complementary elements such as invitation letters, participant lists, feedback forms and web announcements.
- The key findings from the interviews - as they were being written up on D2.2. Partners discussed that despite of the flaws of the existing training methods and materials, the STAR project should follow a needs-based approach and target predominantly the needs of the trainers.
- Working assumptions for D2.4 (legislative, geographical and sectoral scope of the materials) with reference to the project's description of action. Partners discussed the difficulties of tailoring-down the materials, or staying on a general level, risking the lower level of applicability. They decided to stay on a general level, as the project should develop training materials regarding the GDPR but include dedicated
- Pending issues around language, translation, accessibility of training materials, and the types of training materials that would be developed. Partners discussed the potential platforms for dissemination and validation and how to foster stakeholders to translate and integrate the produced materials. The question remained open and will be further discussed during later stages of the project.

During the discussion David prepared a google sheet with notes, thus the others were able to edit the document simultaneously and add their comments and notes regarding the discussed matters. The document eventually formed the basis of Deliverable 2.4.

Filippo explained that the draft deliverables will be shared among partners for preliminary feedback and for the preliminary analysis of the training materials. István said that interviewed stakeholders should be contacted again in order to receive training materials. David asked Gábor and István whether the deliverables should be sent to the Advisory Board members for evaluation together or one by one. It has been decided to send D2.2 and D2.4 to them separately. Participants discussed the timeframe of engaging the EAB and seeking their feedback.

István asked whether the number of conducted interviews is enough or further ones should be carried out. Filippo, David and Gábor said the number is sufficient to proceed with the analysis. Waiting for additional feedback would hinder the efficiency of the analysis due to time constraints. Partners discussed that DPAs and other stakeholders could publish the project on their websites. David asked whether writing the materials only in English could pose a problem in terms of use. István said the materials will be developed under certain creative commons and user will be allowed to translate the materials and implement them into their own practices.