

Justice Programme &

Rights, Equality and Citizenship Programme

Standard template

JUST-REC-AG

**Progress Report**

**Version 0.1**

**07 November 2018**

**Justice Programme &**

**Rights, Equality and Citizenship Programme**

# PROGRESS REPORT

## COVER PAGE

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| **PROJECT** |
| **Project number:** | 769138 |
| **Title:** | Support Training Activities on the data protection Reform |
| **Acronym:** | STAR |
| **Coordinator contact:** | Prof. Paul De Hert, VUB |
| **Starting date:** | 01/11/2017 |
| **Duration:** | 24 |
| **Amendments:** | not applicable |
| **Project website:** | <http://www.project-star.eu>  |

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| --- |
| **PERIOD COVERED**cid:image001.png@01D0B99B.7C10A740 *Please note that this is only a progress report. The information in this report must also be included in the next periodic report/final report.* |
| **Period (from last periodic report)**: | from [01/11/2017] to [31/10/2018] |

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## 1. DELIVERABLES, MILESTONES & CRITICAL RISKS

|  |  |
| --- | --- |
| **Deliverables, milestones & critical risks** | **YES/NO** |
| We confirm that we updated the following PP/SyGMa Continuous Reporting screens:* Deliverables
* Milestones
* Critical risks
 | YES |

##

## 2. OVERVIEW OF THE PROGRESS & ACTIVITIES

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| **WORK PACKAGES** |

### *Work package 1*

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| **Work package 1** **Management and Coordination of the Project** |
| **Activities** *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* |
| Task number(numbering Annex 1 GA) | Task name | Implemented?(Yes/No/Partially) | Justification (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| A1.1 | Launch of the action (kick-off meeting) [M1] |  |  |
| A1.2 | Project coordination [M1-M24] |  |  |
| A1.3 | Financial management [M1-M24] |  |  |
| Other issues *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* |  |
| **Milestones & deliverables***Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.**Ensure consistency with the SyGMa Milestones and Deliverables screens.* |
| Deliverable number (numbering SyGMa) | Deliverable name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D1.1 | Progress report |  |  |
| D1.2 | Kick-off meeting |  |  |
| D1.3 | First coordination meeting |  |  |
| D1.4 | Second coordination meeting |  |  |
| D1.5 | Third coordination meeting |  |  |
| D1.6 | Final, wrap-up meeting |  |  |
| Other issues  |  |

### *Work package 2*

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| **Work package 2: Scoping and stakeholder engagement** |
| **Activities** *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* |
| Task number(numbering Annex 1 GA) | Task name | Implemented?(Yes/No/Partially) | Justification (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| A2.1 | Training requirements capture with EU DPAs | Yes | This activity was broken into sub-activities A2.1.1 to A2.1.3 (see below for details) |
| A2.1.1 | Interview all (the majority of) EU DPAs | Yes | TRI developed appropriate interview questions to meet the project's information needs, then designed interview templates, validated these with the consortium and revised them accordingly.TRI also produced methodological guidance for the project's interviewers. TRI organised and conducted interviews with 9 EU DPAsTRI contacted using multiple contact methods (email, phone), then sent reminders to 8 EU DPAs who eventually did not agree to participate. The NAIH organised and conducted interviews with 5 EU DPAs VUB organised and conducted interviews with XX EU DPAsTRI coordinated the interviews, providing support to the partners as required.  |
| A2.1.2 | Maintain dialogue with DPAs | Partially (ongoing) | We will be shortly following up DPA contacts, reminding them of the project's deliverables and that training material will be forthcoming. The intention here is to keep these contacts involved with the project, access any relevant developments from them and seek their engagement in trialling the project's training material.  |
| A2.2 | Training requirements capture with other stakeholders | Yes | This activity was broken into sub-activities A2.2.1 to A2.2.3 (see below for details) |
| A2.2.1 | Identification of stakeholders | Yes | TRI built a contact list of DPOs by searching DPO associations, and identifying DPO@ email addresses for key industry sectors across the member states. The NAIH had contributed to the establishment of the contact list  |
| A2.2.2 | Interview a representative list of stakeholders | Yes | TRI developed appropriate interview questions to meet the project's information needs (for both interviewees with training responsibilities, and those without), then designed interview templates, validated these with the consortium and revised them accordingly.TRI organised and conducted interviews with 8 DPOs [out of a total of 20] VUB organised and conducted interviews withNAIH organised and conducted interviews withTRI coordinated the interviews, providing support to the partners as required.  |
| A2.2.3 | Maintain dialog with DPOs and other stakeholders | Partially (ongoing) | DPO interview participants were thanked by the consortium partner who interviewed them, for their effort and time, and then were sent a copy of the deliverable D2.2 when that was completed. (This activity is ongoing, and will ramp-up as training material becomes available from WS3. |
| A2.3 | Critical review and identification of best practices from other data protection training material | Yes | A critical analysis of existing data protection training material has been carried out to detect the current best practices, as well as to pinpoint the characteristics that the STAR training materials should have for them to be 1) easily adaptable to each training situation and, 2) easily understandable by audiences with different education, experience, and cultural backgrounds. The consortium requested existing materials directly from our interviewees. Where the circumstances did not allow the interviewees to share those materials, an open source search was carried out on several DPAs’ and organisations’ websites by TRI. A total number of 87 sample materials were been collected and catalogued by the consortium, and a sample of 60 of such documents were been analysed and evaluated based on the criteria of accuracy, comprehensiveness, suitability, coherence with the regulatory environment, delivery quality and clarity, certification, cross-border relevance, accessibility. The insights from this activity were synthesised and reported upon by TRI in D2.2The interview findings were reviewed by both VUB and NAIH |
| A2.4 | Defining and delineating the “Training Materials” | Yes | TRI synthesised the findings from the preceding activities into the requirements for the STAR training materials as reported in D2.3. This included generating guiding assumptions (based upon STAR scope, GDPR, training requirements, and the data protection context), generating general requirements for all training materials, and specifications for the training materials. TRI provided an initial outline of training topics, and then along with, VUB and NAIH conducted an online meeting to agree the key training topics/ seminar list, and debate the content of these. The finalised requirements were reviewed by both VUB and NAIH. |
| Other issues *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* | None |
| **Milestones & deliverables***Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* *Ensure consistency with the SyGMa Milestones and Deliverables screens.* |
| Milestone number(numbering SyGMa) | Milestone name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS1 | Questionnaires developed | Yes | TRI developed appropriate interview questions to meet the project's information needs, then designed interview templates, validated these with the consortium and revised them accordingly. questionnaires were developed for DPAs, DPO and other stakeholders with training responsibilities and stakeholders without training responsibilities. Available as D2.1 |
| MS2 | Interviews conducted and reported | Yes | TRI organised and conducted interviews with 9 EU DPAs, TRI contacted using multiple contact methods (email, phone), then sent reminders to 8 EU DPAs who eventually did not agree to participate. The NAIH organised and conducted interviews with 5 EU DPAs, VUB organised and conducted interviews with XX EU DPAs. TRI organised and conducted interviews with 8 DPOs [out of a total of 20], VUB organised and conducted interviews withNAIH organised and conducted interviews withThe synthesised findings from these interviews were reported in D2.2 authored by TRI. The report contains findings on training methodology (target groups, types of training, existing training materials), key required training topics, and determining future needs in GDPR training.  |
| MS3 | Requirements for training materials defined | Yes | D2.4, produced by TRI presents a finalised detailed list of the training materials to be developed by the STAR project, as well as detailed requirements and specifications for those materials.  |
| Deliverable number (numbering SyGMa) | Deliverable name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D2.1 | Questionnaires | Yes | TRI developed appropriate interview questions to meet the project's information needs, then designed interview templates, validated these with the consortium and revised them accordingly. questionnaires were developed for DPAs, DPO and other stakeholders with training responsibilities and stakeholders without training responsibilities.  |
| D2.2 | Reports for the findings of the interviews | Yes | The synthesised findings from these interviews were reported in D2.2 authored by TRI. The report contains findings on training methodology (target groups, types of training, existing training materials), key required training topics, and determining future needs in GDPR training. |
| D2.3 | DPOs and other stakeholders contact list | Yes | TRI research and compiled a contact list based around privacy@organisation type email addresses in order to minimise privacy risks with collecting and sharing individual email addresses. Following discussion on this point between the project partners, and the project officer, we determined that we were not legally able to collect individual email addresses of data protection officers, but that DPO@ or privacy@ institutional email addresses could be collected.  |
| D2.4 | List of Training Materials and associated report | Yes | D2.4, produced by TRI presents a finalised detailed list of the training materials to be developed by the STAR project, as well as detailed requirements and specifications for those materials. The first section of the report sets out the guiding assumptions for the training materials and rationale for these, as well as the general requirements that apply across all of the training materials, regardless of format. Guiding assumptions include focus upon EU law, language, the anticipated trainers and trainees, delivery formats (face to face and online), structure, temporal relevance and dissemination. General requirements include customisability, practicality, fostering discussion, and modularity. The second section sets out the seminar topics lists upon which training materials will be developed, provides the rationale for their selection, and identifies key sub-topics to cover and pertinent issues. The third section sets out the requirements for the various specific types of training materials – seminar material (including presentations), webinar, training handbook, GDPR compliance checklist for data controllers, and one-page introduction to the GDPR. |
| Other issues |  |

### *Work package 3*

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| **Work package 3: Development of the Training Materials** |
| **Activities** *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* |
| Task number(numbering Annex 1 GA) | Task name | Implemented?(Yes/No/Partially) | Justification (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| A3.1 | Development of Training Material for use by DPAs |  |  |
| A3.1.1 | Development of training scenarios |  |  |
| A3.1.2 | Development of the Training Materials for the training of DPA personnel |  |  |
| A3.1.3 | Development of the Training Materials for the training of DPOs |  |  |
| A3.1.4 | Development of the Training Materials for the training of judges and lawyers |  |  |
| A3.1.5 | Development of the Training Materials for the training of civil servants and public sector employees |  |  |
| A3.1.6 | Development of the Training Materials for the training of the private sector |  |  |
| A3.2 | Development of training material for use by DPOs |  |  |
| A3.2.1 | Development of training scenarios |  |  |
| A3.2.2 | Development of the Training Materials to be used in the public sector |  |  |
| A3.2.3 | Development of the Training Materials to be used in the private sector |  |  |
| Other issues *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* |  |
| **Milestones & deliverables***Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* *Ensure consistency with the SyGMa Milestones and Deliverables screens.* |
| Milestone number(numbering SyGMa) | Milestone name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS4 | Training materials for DPAs and DPOs drafted |  |  |
| Deliverable number (numbering SyGMa) | Deliverable name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D3.1 | Draft Training materials for use by DPA |  |  |
| D3.2 | Draft Training materials for use by DPO |  |  |
| Other issues |  |

### *Work package 4*

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| **Work package 4: Testing and validation** |
| **Activities** *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* |
| Task number(numbering Annex 1 GA) | Task name | Implemented?(Yes/No/Partially) | Justification (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| A4.1 | Validation of the Training Materials |  |  |
| A4.1.1 | Validation of the Training Materials with DPAs |  |  |
| A4.1.2 | Validation of the Training Materials with DPOs and other stakeholders |  |  |
| A4.2 | Testing of the Training Materials |  |  |
| A4.2.1 | Testing of the Training Materials with DPAs |  |  |
| A4.2.2 | Testing of the Training Materials with DPOs and other stakeholders |  |  |
| Other issues *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* |  |
| **Milestones & deliverables***Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* *Ensure consistency with the SyGMa Milestones and Deliverables screens.* |
| Milestone number(numbering SyGMa) | Milestone name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS5 | Training materials validated |  |  |
| MS6 | Training materials tested |  |  |
| MS7 | Training materials finalised |  |  |
| MS10 | Pilot events for DPAs |  |  |
| MS11 | Pilot events for other stakeholders |  |  |
| Deliverable number (numbering SyGMa) | Deliverable name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D4.1 | Web-based questionnaire |  |  |
| D4.2 | Finalised training materials |  |  |
| D4.3 | Feedback forms |  |  |
| Other issues |  |

### *Work package 5*

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| **Work package 5: Dissemination and outreach** |
| **Activities** *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* |
| Task number(numbering Annex 1 GA) | Task name | Implemented?(Yes/No/Partially) | Justification (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| A5.1 | Create and keep up to date the project website |  |  |
| A5.1.1 | Create and expand the project’s website |  |  |
| A5.1.2 | Maintain the project’s communication tools (social media accounts) |  | TRI set up and managed Linkedin and ResearchGate pages for the STAR project<https://www.linkedin.com/company/project-star-eu/><https://www.researchgate.net/project/Support-Training-Activities-on-the-data-protection-Reform-STAR>TRI has promoted STAR through its various Twitter accounts (@trilateral\_uk, @dbarnard-wills, and @fmarchetti\_tri)  |
| A5.2 | Journal articles and trade press articles | Partially | Press release on the launch of the STAR project on the website of the NAIH on 27.11.2017.(https://www.naih.hu/files/2017-11-27-STAR\_Projekt.pdf) |
| A5.3 | Dissemination of the Training Materials among EU DPAs, DPOs and other stakeholders |  |  |
| A5.3.1 | Set-up and hosting of invited webinars |  |  |
| A5.4 | Drafting of D5 report |  |  |
| Other issues *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* |  |
| **Milestones & deliverables***Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* *Ensure consistency with the SyGMa Milestones and Deliverables screens.* |
| Milestone number(numbering SyGMa) | Milestone name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS8 | Project's website & communication tools launched | Yes |  |
| MS9 | Journal articles prepared and submitted for consideration/ publication |  |  |
| MS12 | Weminars |  |  |
| Deliverable number (numbering SyGMa) | Deliverable name | Achieved?(Yes/No) | Justification (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D5.1 | STAR on-line communication tools (website, social media accounts) |  |  |
| D5.2 | Journal article |  |  |
| D5.3 | Press releases |  |  |
| D5.4 | Trade press articles |  |  |
| D5.5 | Dissemination report |  |  |
| D5.6 | Webinars |  |  |
| Other issues |  |

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| **Timetable** *Report on deviations from the description of the action (DoA) in Annex 1 GA.**Fill in the planned implementation in beige and the deviations in red. Repeat lines/columns as necessary.* |
| **ACTIVITY** | **MONTHS** |
| **M 1** | **M 2** | **M 3** | **M 4** | **M 5** | **M 6** | **M 7** | **M 8** | **M 9** | **M 10** | **M 11** | **M 12** | **M 13** | **M 14** | **M 15** | **M 16** | **M 17** | **M 18** | **M 19** | **M 20** | **M 21** | **M 22** | **M 23** | **M 24** |
| **Activity 1.1 - …**  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 1.2 - …** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity …**  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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## 3. BUDGET IMPLEMENTATION

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| --- | --- |
| **Budget implementation —****Use of resources** | **YES/NO** |
| We confirm that the overall budget consumption is in line with the advancement of the activities. *If there are major deviations, identify them and explain the reasons why.* |  |
|  |
| Indicate the amounts spent by the consortium on each budget category since the beginning of the project. |
| Budget category | Total amount(EUR) |
| A. Direct personnel costs | 3.659.090 HUF (1-3 quarter) |
| B.1 Direct travel costs | not applicable |
| B.2 Direct subsistence costs | 33.010 HUF (KOM dinner) |
| C. Direct subcontracting costs | not applicable |
| D. Direct costs of financial support to third parties | Not applicable |
| E. Other direct costs | 331.365 HUF (laptop, laptop case, webcam) |

***]***

## ANNEXES

**LIST OF ANNEXES**

***NA***

|  |
| --- |
| HISTORY OF CHANGES |
| VERSION | PUBLICATION DATE | CHANGE |
| 1.0 | 06.12.2017 | Initial version  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |