D.2.7 The Joint DPO VET Curriculum support material

WP2: Design or improvement of a Joint Qualification in VET

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Introduction

Welcome to DataPro, a co-funded by the Erasmus+ project under Key Action 3: Joint Qualifications in Vocational Education and Training.

This Handbook is specifically designed to support the Employer throughout their engagement in the project's activities. It offers an overview of the project's scope, key activities and expected outcomes and provide concrete information on the pilot implementation of the newly developed Joint DPO VET Curriculum through a Work Based Learning (WBL) Scheme.

WBL will offer an opportunity to learners or future employees to test the applicability of knowledge gained through the online courses and understand the context and challenges of a DPO professional career in a real working environment.

In specific, the following issues will be dealt with:

- Importance of WBL approaches for learners and employers
- Benefits for the employer (see below a brief reference)
- Content of the Work-Based Learning in alignment with the Joint DPO Curriculum
- Providing feedback according to the criteria and milestones set
- Efficient mentoring

DataPro Objectives

DataPro project aims at responding to the challenges of the new European Data Protection regime in the aftermath of the adoption of the General Data Protection Regulation (GDPR) 2016/679 by addressing the skills mismatches that are currently being observed in the sector and incorporating the new digital mentality that is being shaped to companies, employees and young learners. Besides, it intends to bridge the fragmented certification system in the field, by establishing a solid regional partnership among Greece, Cyprus and Germany which may serve as a model for further advancements across the EU.

More specifically, the project's objectives are to:

- **Foster employability** of young learners and employees;
- **Enhance transparency and harmonization** of sectoral skills and qualifications;
- **Support the preparation and setting-up of a new Joint VET Curricula**;
- **Create a standardized VET Certification** for DPOs;
- **Develop a new Work-Based Learning Scheme**;
- **Foster** cross-border, transnational and interregional **mobility**

The project targets:
- Stakeholders: Chamber Unions, Chambers of Commerce and Industry, employers
- End-users: lawyers, current and future employees, learners & trainers

You may find more information about the project, the educational material and the WBL on the link**:** https://datapro-project.eu/site/en/index.html**.**

DataPro Online Course and WBL The development of an online training course which will be piloted through a Work Based Learning Scheme are the core activities of the project. As a partnership, we have developed two courses:

- the Joint DPO VET Curriculum, a more sophisticated course which is addressed to current and future DPO Officers
- the Awareness Raising Training Course, a simplified version which is addressed to the general population who wishes to have an idea on the rights and obligations the GDPR generates and the way it affects our personal and professional lives.

Both courses are offered on a modular form and are available on a MOODLE online platform: Dashboard | DATAPRO Project (datapro-project.eu). They are delivered as asynchronous courses and are accessible 24/7, enabling the learner to decide on the time of attendance, based on his/her preferences and personal schedule. Learners are quite independent as they can download the educational material and complete the training on their own pace, interrupt the course at any time and return later. The access is free and it requires a simple registration. The platform will be supported by technical staff and tutors/trainers who will address the learners' inquiries within 48 hours.

Course Structure and Content DataPro Pilot Implementation of the Joint DPO VET and Data Protection Awareness Raising Curricula will be divided into 2 phases:

1st phase

It entails the learner's **theoretical training**, which will be conducted individually through an online course, as described in the previous section. The Joint DPO VET course is designed to last **2 weeks**. The actual duration of the course depends on the acquired knowledge, the level of engagement and the time dedicated by each learner within the day.

After registration, the learner is requested to take a pre-course survey in order to self-assess their current knowledge on the field. The training materials are structured as follows:

- **Module 1: The European Framework for Data Protection**: It introduces the learners to the nature and concept of personal data, the content of the new EU Data Protection Regulation 2016/679 and the changes in the interpretation of personal data against the previous legal regime, the competent authorities and respective governance system.

- **Module 2: Protection of Personal Data during management. Legal status and Information Security Governance:** It provides a general overview on the significance of the new GDPR, its territorial scope, the rights born by GDPR for the individuals and their restrictions, their applicability to Internet and e-commerce, the rules that govern international data flows, the protocols for storage, processing and transfer of data and the concept of sensitive data.

- **Module 3: The Role and Responsibility of DPO**: It gets us to the core of this project as it crystallizes the role of DPO Officer, duties and responsibilities, their necessary qualifications in order for the businesses to meet the standards and legal requirements the GDPR sets forth. It also analyses the responsibilities of DPOs towards the Supervisory Authorities and showcases Risk Reduction and Personal Liability Strategies. Last, it describes the DPO Code

of Conduct, its indicative content and its benefits if adopted by the Data Protection Department of a company.

- **Module 4: Internet, e-commerce and Personal Data:** The last module presents basic concepts about Information Security, techniques on user and access management in alignment with Data Protection within companies, the causes and consequences of data breach and the respective Response Actions, Impact Assessment techniques and Monitoring Requirements. It also focuses on raising awareness among employees to prevent or effectively respond to a data breach.

All modules are supported by case studies that show the enforcement of GDPR in real life conditions. Each one contains a short quiz at the end of the section which enables the learner to check their knowledge.

At the end of the project, the learner will be asked again to fill in a post-course survey. This will help them test their newly-acquired knowledge and will contribute to the overall assessment of the quality of the course and its improvement if this is considered necessary.

The course is supported by additional resources for those interested to go a step further and enhance their knowledge on the field.

2ⁿᵈ *Phase*

Theoretical training is followed by a virtual Work-Based-Learning Scheme of a total duration of 20 hours in total. The Work Based Learning is an opportunity for learners to acquire a short-term working experience as part of a process "learning by doing".

The original plan of the project was to conduct the WBL with physical presence inside the businesses where the learners would come in contact with the daily routine of a DPO and the actual conditions of their work. However, due to COVID-19 outbreak in the beginning of 2020, it became clear that this option was no longer available. Therefore, the WBL was shifted in being delivered virtually.

No matter what, the learners will have the opportunity to apply what they have learned and check their relevance with the actual demands of the market in accordance with the skillset described on the Joint DPO VET Curriculum.

The modes of delivery of the virtual WBL in each country will be specified and mutually determined between the national social partners participating in the project and the employers.

The alternative modes include:

- Practical assignments: The participating organizations will draft realistic scenarios in relation to DPOs work, data threats or security incidents and learners will be requested to write down in detail their actions, responses or workplan on how to solve the issue in reference, based on the areas covered by the training materials. Employers *will be asked to review these scenarios and make any necessary adjustments* or modify them in order to be in line with their internal practices or actual daily routine. After being completed, the practical assignments will be handed over to tutors/trainers for being checked and graded (and may be forwarded to employers if they wish to be further involved). It is highly recommended that tutors/trainers will have a conversation with the employers on the correct or acceptable responses to the scenarios in order to give more credible and market- oriented feedback to the learners while checking their assignments.

- Mentoring sessions/conversations in groups or in pairs: Separate online meetings with the participation of both learners and DPOs (or the employers' representatives) will be organized at national level where the two parties will discuss on the opportunities and challenges the DPO career is offering, the tasks and responsibilities, the legal and technical requirements and the changes the GDPR has brought in a real workplace. The participation of tutors/trainers is optional but it is encouraged.
- Virtual Classrooms: it could be either organized at national level or transnationally (provided that all partners have a consensus on delivering the WBL this way), where tutors and employers will jointly present the outline of the DPO career, their tasks and responsibilities. In that case, it would be interesting to put together employers from different sectors, giving the learners an opportunity to explore alternative career pathways or develop a better understanding on the various activities Data Protection is affecting inside an organization. The duration of virtual classrooms may not exceed 12 hours, divided in different days.
- Video presentations: Tutors/trainers will be provided actual case studies by the employers who wish to be involved in the process; they will analyze them, trying to focus on the actions that were taken/should be taken as the theoretical framework will have been covered by the individual training. The duration of the videos should not exceed 10 minutes each, so that the learners' attention is not distracted and they will get the maximum benefit from their attendance. A total of 2-4 videos is highly recommended.
- Combination of alternative modes: To diversify the sources of learning and keep the learners' interest vivid, we strongly recommend a combination of the below described methodologies based on the identified scheme at national level, on the one hand, and the capacities and resources of each participating company, on the other.

The framework of the Work-Based Learning could be summarized as follows:

DataPro Pilot Course Timeline of Activities	
Activity	**Duration**
A. Online training	2 weeks (approximately 20h of study/week – total 40h of study)
B. Work-based learning	2 weeks (approximately 10h of work/week)

Involvement in WBL

Learners

The virtual WBL can be completed by learners having attended Data Protection online course and current employees who already work in the Data Protection sector and wish to benefit from an upskilling/reskilling opportunity, bringing new ideas or workplans into their companies inspired by the project.

Employers

The term "employer" refers primarily to the categories of businesses that can take part in the WBL process. This entails:

- Companies dealing with Personal Data
- Healthcare centers
- Legal firms

- IT companies
- Interdisciplinary private or public-funded organizations dealing with Personal Data
- Any business that stores and processes Personal Data

The professionals that can be involved in the process on behalf of their companies are:

- DPOs or Head of Data Protection Departments
- Legal Departments
- HR Departments
- IT Departments

Tutors/Trainers

The WBL process will be supported by a tutor/trainer who will have a mediating role between the learner and the employer. The tutor/trainer will be responsible for collecting feedback from the employer, checking and grading the practical assignments (in cases this mode is selected) and participating in the mentoring sessions/conversations (unless otherwise agreed with the employer). They will be also the contact point of the learner, solving any potential issues that may arise or responding to any inquiries after the completion of the WBL. Therefore, it is important for the three parties (learner-tutor-employer) involved in the WBL scheme to communicate and collaborate.

All the parties will be also involved in the assessment of the WBL, replying to an online questionnaire that will be distributed after the end of the WBL and evaluating its quality, comprehensiveness, relevance with actual market needs or suggesting improvements that will be used for the refinement of the Curriculum and as lessons learnt.

Supporting the trainer through WBL

Under this chapter "Strategies on how tutors/trainers create a good learning environment for the learner" are highlighted:

- *Build a relationship of mutual trust*; the learner should feel comfortable to express his thoughts, concerns, doubts or incidents that are taking place in the workplace.
- *Ensure that the learner is aware of his/her learning objectives* and how his/her tasks contribute to reaching these objectives.
- *Encourage the learner to describe his/her impressions or opinion* in the workplace but ensure that he/she knows how to do that in an appropriate and professional way!
- *Remind the learner of the importance of being proactive* when carrying out tasks and showing the right attitude, even when he/she is requested to deliver tasks that might not interest him/her as much as others! Make him/her aware that a positive approach to every task will get him/her noticed and remembered.
- *Support the learner when he/she receives negative feedback*; help them handle frustration and explain them that a possible failure is an indispensable part of the career path and will help them to improve themselves. As it has been clearly indicated, the participation of the Employers in the WBL is of utmost importance as they will offer an insight into the real needs and working conditions of the sector. They will also help them develop the necessary qualifications and skillset that are required for a launch or a successful career in the field. Last, they will also contribute in bridging the gap between VET Education and Employment Market as these two fields remain quite isolated.

Indicative sections to be covered by the employer during the WBL

- Definition of data of personal character and concrete examples on how to safeguard them in line with the GDPR.
- Restrictions in making use of GDPR and obligations of the companies
- Naming the competent authorities involved with Data Protection at national and EU level
- Description of the processes of safely store, process and transfer data from EU to third countries
- Applicability of GDPR regulations in the daily work of a DPO Officer/employee
- Setting up of a detailed Data Breach Response Plan for an IT threat that has affected a company
- Internet, e-commerce and Data Protection: Rights and obligations of the consumers/citizens
- Outline of DPO career, their tasks and responsibilities, the legal framework and Code of Conduct as specified within a given company
- Opportunities for employment in the sector, necessary skillset, portals/channels for job-hunting, tips for interviews tailored in the DPO profile, employers' expectations
- New areas under development/milestones/future challenges related to Data Protection

Portfolio of resources

Under the specialization course, the learner should read the potential bibliography that is attached to each module. Moreover, within this handbook he/she/it is able to have access to a wide variety of electronic resources, like the following:

Resources
• Dentons' Global Privacy and Cybersecurity group: https://www.privacyandcybersecuritylaw.com/about-us/
• European Commission-Data Protection: https://ec.europa.eu/info/law/law-topic/data-protection_en
• Council of Europe-COVID-19 Data Protection Resources: https://www.coe.int/en/web/data-protection/covid-19-data-protection-resources
• Iapp: https://iapp.org/resources/topics/eu-gdpr/
• Handbook on European Data Protection law: https://book.coe.int/en/human-rights-and-democracy/7748-pdf-handbook-on-european-data-protection-law-2018-edition.html
• European Data Protection Board: https://edpb.europa.eu/edpb_en
• Understanding the New European Data Protection Rules: https://www.routledge.com/Understanding-the-New-European-Data-Protection-Rules/Lambert/p/book/9780367657680

Feedback Feedback is one of the most significant parts of the WBL process, as it will not only assist to monitor the learner's progress but to measure the overall success of the project. Thus, you will train the trainers both to educate employers on the appropriate feedback techniques and processes and learners on receiving and integrating it in their job. A triangle communication among learners, trainers and employers is a prerequisite for the achievement of learner's maximum potential and tutors/trainers will play a key role in establishing effective channels of communication.

Feedback should be given in a way that:

- Is clear and conceivable by the learner; perplexed analysis with indicators/data may not serve the real purpose
- Specific; general and indefinite feedback does not help the learner to improve himself/herself. On the contrary, it may confuse him/her
- Objective; the feedback must not be based on personal bias or opinions but on results, performance and professional requirements
  - Not offensive and intimidating, gender/age/nationality etc. neutral
  - In private;
  - On time;
  - Is balanced;
- it focuses on the characteristics that could be improved but also highlights the individual's strengths or is formulated in a positive way

How learners should react when getting feedback:

- Not take it personally and avoid emotional reactions; the purpose of feedback is to help learners to become better. Even if learners do not agree, they have to respectfully express their objections
- Listen carefully
- Focus on future improvement and suggest options or solutions
- Ensure that you understand the next steps and you are committed to implement what you have listened.