D.2.12 Report with Findings from the Adaptation Workshop

WP2: Design or improvement of a Joint Qualification in VET

PROJECT INFORMATION

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This document seeks to compile all the findings that resulted from the Adaptation Workshop, organized virtually a few days before the completion of the project, with the purpose to integrate the insight of different experts and stakeholders in Vocational Education and Training and the business sector.

The Report reflects the opinions of the National Stakeholders' Committee on the sectors that were identified as important during the preparation of the agenda and the guidelines for the Adaptation Workshop. The experts were given access to the Researches on the current status of the Data Protection Sector that were conducted in the beginning of the project, the developed Curricula and the training materials while they were updated on the way the Work-Based Learning was delivered in each country. Taking into consideration the national system of the Vocational Education and Training, the local market, the needs in skills and qualifications for DPOs and the existing mismatches, the experts assessed the Curricula and provided input for their improvement.

Most of the findings concerned the implementation of Work Based Learning, which, due to the extreme circumstances, could not be conducted as originally planned, meaning in the businesses' headquarters. On the contrary, it took place virtually, introducing a hybrid method which combined online discussions with market experts or professional trainers and realistic case studies with incidents that a DPO may be confronted with in his daily routine. This choice, imposed by force majeure, led to different results than the ones that would have been brought up if the WBL could be delivered on site; however, it gave the learners the opportunity to apply their theoretical knowledge and address varying levels and incidents of Data Protection security breaches, fulfilling the essence of the WBL as originally planned.

1.   Table of Contents

Guidelines and methodological framework for the adaptation of the curricula

Following the conduction of the Adaptation Workshops, we concluded to the necessary modification of the DataPro Curricula in order to ensure that a generic content, developed in collaboration of different partners featuring the actual market needs in the Data Protection Sector, is fit-for-purpose and suited to the context and specific requirements of a particular country. Modifications to the Curricula were, also, undertaken by the national VET Providers, while the curriculum was under preparation.

A set of methodological principles and guidelines for the adaptation of the curricula was developed by AMC – an effort which required particular attention. Key factors which were taken under consideration were:

a) Provisions based on the national legislation framework;
b) Learning outcomes, occupational profile and reference to each country's NQF;
c) Methodological approach and modes of delivery per country;
d) VET system structure in the participating countries;
e) Management structures that have an impact on the modes of delivery

General Observations and COVID-19 effects

AMC drafted the methodological guidelines for the adaptation of the Curricula with reference to the parameters mentioned above. The purpose of these guidelines was to ensure a unified approach in adaptation and modification of the Curricula from all relevant project partners, with a focus on the linguistic adaptation, the NQF reference and VET system structure, as these categories were deemed more necessary.

Nevertheless, it should be emphasized that the project had to overcome unexpected challenges due to COVID-19 and the subsequent lockdowns in the participating countries. The original planning proved to be ineffective in some parts of the project, especially the Work-Based Learning. The COVID-19 outbreak in Europe coincided with the production of the training materials, which were anyway designed to be delivered online. Despite the delays in the finalization of the materials, the individual learning was not affected; on the contrary, it was facilitated as learners had more time to focus and complete their courses online.

Hence, it proved to be more challenging when it came to the implementation of the WBL. Due to strict hygiene measures in both public and private sectors in all EU countries, business owners were susceptible to host learners in their workplace or to allow them connect on their systems without efficient surveillance. Therefore, the partnership had to adjust and come up with a viable alternative, allowing learners to be trained by "in-company" or business experts on realistic scenarios or case studies. Given the circumstances, the WBL proved to be as

effective as possible, providing the learners with an insight on the actual working life of a DPO and, at the same time, settling the concerns of employers.

Country adaptation workshops in each country

The Adaptation Workshops included representatives from the National Stakeholder Committee, as well as selected experts/practitioners with practical experience in VET, legal and IT sectors and businesses identified in each country. The workshop was planned on a 1-day agenda, aimed to take place after the piloting stages and/or in order to finetune and improved the learning materials for future learners who may be interested to enroll into the Curricula. The results, views and feedback were captured in separate meeting minutes, which were compiled by the partners.

As a result, one national workshop was organized in each country by the national Chamber a few weeks before the completion of the project. In Greece, the National Stakeholder Committee was coordinated by UHCC, with the participation of AMC and EOPPEP. Similarly, the Cypriot and German partners also organized a discussion with the main stakeholders.

Each workshop targeted the aspects that needed to be adapted per Curriculum in a way that added value to the specific needs of each country. The feedback collected from the Adaptation Workshops covered the categories mentioned below:

a) *Content outline*
b) *National Legislation for Data Protection – Translation – Terminology*
c) *National Framework for Professional Qualifications / Occupational Profile*
d) *Linking Learning Outcomes – Competences - Specific Tasks*
e) *Management structure*

In general, the findings summarized the alignment and relevance of the learning materials with the objectives of the course. According to participants, the online courses being supported by a WBL were useful for this type of course. Taking this principle into consideration, DataPro Curricula have served the short and long-term needs of learners, aiming to assist learning through development of simple to advanced skills and through acquiring appropriate attitudes.

A. Content Outline

DataPro project offers two Curricula which address the needs of 2 different target groups: (a) Joint DPO VET Curriculum which intends to provide the necessary knowledge and skillset to current and future Data Protection Officers (DPOs) and (b) Data Protection employees

Awareness-raising Training Programme which aspires to respond to the needs of employees who are involved in data management, processing or storage but without holding the position of DPO.

Overall, both Curricula aim at responding to the skills mismatches that have been brought out in the labour market after the introduction of GDPR 2016/679, covering the needs of a more specialized and in-depth training, in the first case, and generic but useful information, in the second. In that sense, the second Curriculum is a sub-programme of the first one.

As a result, DataPro project is addressed to a diverse audience, as it was the objective from the very beginning. Among its end users are not only learners, current and future DPOs but also lawyers, unemployed or professionals who are interested in or actually dealing with Data Protection, representatives of the market, members of Chambers or local authorities who are in a process of rapid transformation due to the technological progress, the stricter security protocols and the greater risk of breaches as well as the emerging business trends.

Based on the findings of the desk research and the gap analysis, parts of the Curricula that are offered in the national markets of the 3 participating countries focus on complex legal or technical aspects of Data Protection, without offering a practical view on DPOs responsibilities. Thus, we intended to offer a new dimension, structuring our project around the actual needs of the labour market, with the aim to respond to the skills mismatches that the results of the interviews and focus groups identified as the most pressing or necessary.

B. National Legislation and Terminology

Translation of the materials was one of the major adaptations that were foreseen to take place in order to enable the learners of the participating countries to grasp the actual meaning of the terminology contained into the courses and make studying of a complicated subject easier.

The necessary modifications in the terminology, however, proved to be limited due to the principles set from the partnership even at the most primary stages of the project and the nature of the project itself; looking to a unified framework in VET in order to respond to the new requirements of GDPR 2016/679 and the harmonization of legal systems in EU countries in terms of Data Protection, the project focused, from its start, in familiarizing the public with the European legislation and its everyday applications in working environments. From that sense, it does not address elements with localized character (e.g. contradictory practices, legislation etc.) which set the need for adaptation in national laws and regulatory frameworks out of the context.

As emphasized above, the national connotations of the legal terms and the precise translation – which was of utmost importance to avoid blurring legal concepts- were the first component to be taken into account. Translation of the training materials was performed by certified translators/companies which ensured that terminology was transferred or adjusted to the national linguistic contexts. As the project aims at responding to gaps in competences within a newly introduced sector which has recently started to being shaped (with the exception of Data Protection in the Healthcare Sector where this is performed for several decades), there is no reference to national legislations/regulations that affect these specific working aspects.

It should be emphasized that the partnership does not ignore the internationalization process of the EU regulation into national legal systems, nor any national laws that may specialize the content of GDPR 2016/679; however, we opted for differentiating our training programme from a legal-centered scheme and providing, instead, an overall update on the EU framework and its consequences for the business sector.

Alignment with European Qualifications Framework – EQF

DataPro Curricula were centrally developed which favored and promoted systematization of content and brought about uniformity of format. Among the key objectives of the designed Curricula is to ensure that the learning outcomes and the knowledge, the skills and competences which will be acquired through them are **comparable**, meeting the requirements of EQF.

Being recommended by the European Parliament and the Council of 23 April 2008, the **European Qualifications Framework for lifelong learning (EQF Framework)** established a common reference framework of eight levels of qualifications, starting from Basic Knowledge (Level 1) to Highest Expertise (Level 8), expressed as learning outcomes with improving levels of proficiency. Even if **EQF cannot, per se, lead to the harmonization of qualifications or qualification standards** between EU and Member States, nor it introduces the automatic recognition of qualifications among Member States, it may inspire the convergence of qualifications between two or more countries.

To this end, and to be able to identify the EQF level of DataPro project, we had, at first, to determine its lifelong learning framework. It could be perceived as a continuous VET programme, upskilling/reskilling current employees of a certain educational background (lawyers, ITs etc) and a level of working experience or training future employees who will be studying a relevant field.

Taking the aforementioned into consideration, we designed the DataPro Curricula to align with EQF Level 5. The Adaptation Workshops reaffirmed that the materials correspond to this Level as per our initial planning, which did not require further adjustments.

Reference to NQF levels

To further elaborate the relevance of DataPro Curricula to the national VET systems and labour markets of the three participating countries, a reference to NQF level is of utmost importance.

National qualifications frameworks (NQFs) classify qualifications by level, based on learning outcomes. This classification reflects the **content and profile of qualifications** - that is, what the holder of a certificate or diploma is expected to know, understand, and be able to do. In order to be able to set DataPro's EQF level, an alignment was made with the NQF levels of Greece, Cyprus and Germany.

As described in ***D.2.4 Recommendations for Designing and Delivering a Joint VET Curriculum and an Occupational Profile for DPOs***, the DPO Occupational Profile has not yet formulated in Greece and Cyprus; this means that the respective training seminars are voluntary for better equipping employees who respond to DPOs tasks. Germany, on the other hand, has already framed the DPO profession based on the Code of Practice for Data Protection Officers; however, this needs to be updated according to the new requirements of GDPR 2016/679.

Hence, the attempted alignment was conducted based on our general intuition on VET programmes of relevant subject and course structure and not grounded on pre-defined standards of the respective Occupational Profiles.

More specifically, the **Hellenic Qualifications Framework** (HQF) is consisted by an eight-level structure defined in terms of knowledge, skills and competence and based on the learning outcomes approach. DPO Occupational Profile is aligned to HQF Level 5 which is referencing to EQF Level 5.

The same applies to the **Cyprus Qualifications Framework** (CyQF) which follows an 8-level and input-based (quality of teachers, infrastructure, and length of education and training programmes) system. Assessment of learning outcomes has not been defined in national legislation or policy documents yet (CEDEFOP, 2018). DPO Occupational Profile is also, in the Cypriot case, aligned to CyQF Level 5.

Respectively, Germany's national qualifications framework for lifelong learning, **Deutscher Qualifikationsrahmen für Lebenslanges Lernen** (DQF), describes professional and personal competences on eight levels. As the only country which holds some kind of official recognition of DPOs as a distinctive Occupational Profile, it integrates it under DQR Level 5 which matches EQF Level 5.

Following the analysis of the three countries' NQF systems to the designed DataPro Curricula, the partnership concluded that the EQF level set for the purposes of the project would be EQF Level 5, addressing the current needs of DPOs and the continuous increase in the sectoral demands for up-skilled and re-skilled employees.

Linking Learning Outcomes – Competences - Specific Tasks

DataPro Curricula are designed to meet the increased demands of the world of work but they serve a different purpose: the Joint DPO VET Curriculum responds to Basic Qualifications that are a precondition for exercising the profession of DPO while the Data Protection employees Awareness-raising Training Programme offers Additional Qualifications to employees who are not going to perform DPO tasks but are in need of a generic training on Data Protection as their department of business sector deals with personal data.

Basic Qualifications are minimum knowledge, skills and competences that are:
- Non-comparative (requiring a level of prior experience/education/training);
- Objective (accompanied by a certificate which testifies for the assignment of specific knowledge);
- Relevant to performance of the particular position

The DPO profession, which has only recently started to be formulated, is grounded, for the time being, on the respective certification which enables employees with different educational background to work in the field or cover the position of DPOs within a company. As the EU market struggles to respond to a new framework, current DPOs are, most of the times, lawyers or persons having graduated from Law School who further attend specialized trainings or seminars with the aim to upskill or reskill themselves. Nevertheless, the DPO role requires more than that; it needs a set of technical, administrative and soft skills which will guarantee the successful delivery of a wide spectrum of activities intending to safeguard the company's interests and legal obligations and monitor the performance of different departments that are involved in data management, processing or storage.

In the light of moving from a transitional period where companies were focused in reflecting to the new direction, potential DPOs are now requested to fulfill the criteria in order to be

hired under this role. We are witnessing a turning point from additional qualifications to basic ones that should be proven before a person is offered the job.

On the other hand, for employees who do not hold the DPO role within a company, Data Protection training could be perceived as a strong asset. This could be also seen under an Additional Qualifications perspective, including knowledge, skills and competences that go beyond the regular training contents.

Additional Qualifications are:
- Behavioural Knowledge (enabling a person to excel at their work)
- Preferred set of qualifications (which, if missing, will not disqualify a person but they surely help them to perform at the best possible level)

It is possible to acquire either special qualifications tailored to one's own training occupation or comprehensive qualifications. Learners can develop their expertise, improve their skills and broaden their competences. The specialist knowledge they acquire enables them to open up new and interesting fields of work and thus improve their chances on the labour market.

Management structure

Regarding the structure of the VET system and market in the participating countries, this was taken into account during the preparation, implementation and follow-up of the Work Based Learning, in compliance with the specific regulations that are applied in each national system. More than that, both the theoretical training and the WBL had to adjust into the COVID-19 medical emergency. The original planning predicted for a blended learning methodology; there would be a combination of distant, individual learning and in-classroom sessions for the theoretical training; and an "in-business" WBL.

As highlighted also above, due to COVID-19 all lessons should have been delivered online as well as WBL. The partnership had to face, on the one hand, the restrictions and the limitations in the number of participants in VET and businesses and the reluctancy of business owners to host "in-house" WBL and expose both their employees and the learners into medical risks.

Adaptation Workshop Agenda – answers collected

<u>**Greece**</u>

Detail of participants and adaptation process	Completed
a. Sign-in sheets/ date/ how many were the participants?	4
b. Who organized the process?	AMC
c. Schedule and duration?	2 hours
d. Did it achieve its purpose?	Yes

What was presented to the respondents	Completed
a. Content presented?	• Joint DPO VET Curriculum • Data Protection employees Awareness-raising Training Programme
b. How was it presented?	Computer, PowerPoint presentations

What feedback was collected	Completed
a. How was spoken feedback collected?	Very good
b. Was there other means of feedback	No

Summary of Feedback	Completed
✓ Feedback comments on the *Content outline*	Very good
✓ Feedback comments on the *National Legislation for Data Protection - Translation – Terminology*	Linguistic adaptation has been already performed during the translation of the training materials to learners' national languages. There was no reference on national legislation.
✓ Feedback comments on the *National Framework for Professional Qualifications / Occupational Profile*	The Curricula have been aligned to the right EQF/NQF level, based on the content of the materials
✓ Feedback on *Linking Learning Outcomes – Competences - Specific Tasks*	Very Good;

	Curricula Outlines were well structured and informative
✓ Feedback on *Management Structure*	Clear and organized in steps; managerial processes regarding monitoring theoretical training and supporting WBL are well-defined
✓ Comments on the training platform	- User- friendly; - Accessible by multiple media; - Well- structured setting and easy on the eye; - All parties are actively involved and need to interact with each other for the delivery of the WBL on a weekly basis
✓ What aspects of Work-Based Learning should be adapted?	Due to COVID-19, the Work-Based Learning was adjusted to the new conditions; therefore it was difficult to evaluate it according to the original criteria set. Due to the circumstances, the Work-Based Learning was delivered online and learners were asked to apply theoretical solutions to actual case studies. Taking this into account, the learners demonstrated a good level of understanding and improvising in real-life scenarios, however they were not permitted to perform everyday work inside a company which would enable an assessment under critical circumstances
✓ What elements were considered easy to apply?	Training materials of different kind (powerpoints, audiovisual, live briefs)

✓ Any other suggestions	None

Guidelines for future training	**Completed**
✓ What aspects of Work-Based Learning should be adapted in future training?	To see the potentials of the Work-Based Learning in their whole spectrum, it should be implemented "in-house"
✓ What aspects of the Work Based Learning should not be adapted in future training?	1. An ongoing feedback mechanism and interaction between learners, trainers and employers should be maintained as it seems quite effective. 2. Prior "in-classroom" training using PowerPoint presentations, discussion groups and experiential learning are fit for the purpose for the successful delivery of the WBL.
✓ What changes are recommended	None.

Cyprus

Detail of participants and adaptation process	**Completed**
✓ Sign-in sheets/ date/ how many were the participants?	3
✓ Who organized the process?	CERIDES
✓ Schedule and duration?	2 hours
✓ Did it achieve its purpose?	Yes

What was presented to the respondents	**Completed**
✓ Content presented?	• Joint DPO VET Curriculum • Data Protection employees Awareness-raising Training Programme

✓ How was it presented?	Computer, PowerPoint presentations

What feedback was collected	Completed
✓ How was spoken feedback collected?	Very good
✓ Was there other means of feedback	No

Summary of Feedback	Completed
✓ Feedback comments on the *Content outline*	Clear and well-defined; Distinctive units dealing with a different subject; The duration is efficient (possibly a little stretched for the materials of the Curriculum only), considering that the learners may be interested in reading the additional resources provided.
✓ Feedback comments on the *National Legislation for Data Protection - Translation – Terminology*	There was no reference on national legislation, as the project itself is focused on the EU legislation
✓ Feedback comments on the *National Framework for Professional Qualifications / Occupational Profile*	The Curricula have been aligned to the right EQF/NQF level. Some sections of the Data Protection employees Awareness-raising Training Programme could be considered appropriate for EQF6, if taking into account that this Curriculum is broader in its scope.
✓ Feedback on *Linking Learning Outcomes – Competences - Specific Tasks*	All units are linked with Learning Outcomes and provide the general framework for a DPO's necessary qualifications. Specific tasks are not concretely stated but they can be assumed
✓ Feedback on *Management Structure*	In line with the national VET/business operation;

	coordinating efficiently VET and business collaboration after Chamber's liaison
✓ Comments on the training platform	• Well-organized • Easy to navigate
✓ What aspects of Work-Based Learning should be adapted?	Due to COVID-19, the Work-Based Learning was delivered online. Instead of working inside the companies, learners participated in a series of training sessions where they were given case studies for analysis. The sessions were of appropriate duration and covered the topics described in the units.
✓ What elements were considered easy to apply?	The whole training process was easy to follow
✓ Any other suggestions	None

Guidelines for future training	**Completed**
✓ What aspects of Work-Based Learning should be adapted in future training?	The whole WBL scheme should be organized as originally planned; currently, it was delivered online due to emergency circumstances. However, if the partnership decides to apply it online, then they should increase the duration
✓ What aspects of the Work Based Learning should not be adapted in future training?	Covered above
✓ What changes are recommended	Covered above

Germany

Detail of participants and adaptation process	**Completed**
✓ Sign-in sheets/ date/ how many were the participants?	2

✓ Who organized the process?	IHK - PG
✓ Schedule and duration?	2 hours
✓ Did it achieve its purpose?	Yes

What was presented to the respondents	**Completed**
✓ Content presented?	- Joint DPO VET Curriculum - Data Protection employees Awareness-raising Training Programme
✓ How was it presented?	Computer, PowerPoint presentations

What feedback was collected	**Completed**
✓ How was spoken feedback collected?	Very good
✓ Was there other means of feedback?	No

Summary of Feedback	**Completed**
✓ Feedback comments on the *Content outline*	Very good; well-structured and informative
✓ Feedback comments on the *National Legislation for Data Protection - Translation – Terminology*	Terminology was adapted during the translation; no need to make reference to national legislation
✓ Feedback comments on the *National Framework for Professional Qualifications / Occupational Profile*	Appropriate match with DQR Level
✓ Feedback on *Linking Learning Outcomes – Competences - Specific Tasks*	Excellent; it explains the structure of the courses in a very efficient and comprehensive way
✓ Feedback on *Management Structure*	Very good; no contradiction with the processes usually performed in VET Studies were observed
✓ Comments on the training platform	Good; The appropriate use of the platform including the monitoring and feedback

	process integrated, requires a prior training of all parties before being put in practice
✓ What aspects of Work-Based Learning should be adapted?	None. The requirements of "dual system" have been taken into account
✓ What elements were considered easy to apply?	All – nothing to report
✓ Any other suggestions	All topics covered above

Guidelines for future training	**Completed**
d. What aspects of Work-Based Learning should be adapted in future training?	A more extended period of WBL according to the scheduled one as the longer WBL lasts, the more accurate the results will be.
e. What aspects of the Work Based Learning should not be adapted in future training?	The existence of a Work-Based Learning Scheme itself
f. What changes are recommended	None.