



The corporate focus on information, training & awareness

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GDPR

AWARENESS: LET'S MAKE IT PRACTICAL

Accountability



**Creating Awareness
inside
&
(possibly)**

outside an Organization

**GLOBAL
AWARENESS**



A human-centric Culture

GDPR art. 1

This Regulation protects fundamental rights and freedoms of Natural Persons and in particular their rights to the protection of personal data

Spreading Awareness & Culture through ...

Positive actions

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graph TD; A[Positive actions] --> B[Information]; A --> C[Training];
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Information

Training

Effective Information & Training in practice

Guidelines?

Not in the GDPR, but ...



Legislative Decree n. 81 / 2008

Safety at the workplace

■ Art. 36: Information to the Staff

1. The employer ensures that each worker receives **adequate** information:

✓ on the **risks** to health and safety in the workplace *connected to the business in general ...*

✓ on the **name of the person in charge of the prevention and protection service ...**

✓ on the **specific risks** to which it is exposed in relation to the activity carried out, the safety regulations **and company provisions** on the matter...

✓ On the **protection and prevention measures and activities adopted....**

4. The content of the information must be easily understandable for workers and must enable them²⁰ to acquire the relevant knowledge. Where the information concerns immigrant workers, it takes place after verifying the understanding of the language used in the information path.

Information
or
spreading safe behaviours

INFO ON:

- ✓ Proper and adequate way of processing the personal data
- ✓ Durées and sanctions

INFO THROUGH:

- ✓ Signs and notices on the Company wall board
- ✓ Newsletters & blogs
- ✓ Sharing «near misses» and lessons learned
- ✓ Audiovisuals
- ✓ Chats and Q&A Days
- ✓ Privacy Champions of the Year

Legislative Decree n. 81 / 2008

Safety at the workplace

■ Art. 37: Staff active training : Who & What

1. The employer ensures that **each worker** receives **sufficient and adequate training** in health and safety, also with respect to language skills, with particular reference to:
 - ✓ a) concepts of risk, damage, prevention, protection, organization of company prevention, rights and duties of the various company subjects, supervisory bodies, control, assistance;
 - ✓ b) risks related to the duties and possible damages and consequent prevention and protection measures and procedures characteristic of the sector to which the company belongs, ...
2. The employer also ensures that each worker receives sufficient and adequate training regarding the **specific risks** referred to in the titles of this decree subsequent

28/01/2022

Legislative Decree n. 81 / 2008

Safety at the workplace

- **Art. 37: Staff active training: Who & What**

7. The **Managers in charge** receive from the employer adequate and specific training and **periodic updating in relation to their duties** regarding health and safety in the workplace. The contents of the training referred to in this paragraph include:

a) main parties involved and related obligations;

b) definition and identification of risk factors;

c) risk assessment;

d) identification of the technical, organizational and procedural measures of prevention and protection.

28/01/2022

Legislative Decree n. 81 / 2008

Safety at the workplace

- Art. 37: Staff active training : How

13. The content of the training must be easily understood by workers and must enable them **to acquire the necessary knowledge and skills** in the field of health and safety at work. Where the training concerns **immigrant workers**, it takes place after **checking the understanding and knowledge of the language used in the training course**.

5. The training is carried out by an **experienced person**.

Legislative Decree n. 81 / 2008

Safety at the workplace

■ Art. 37: Staff active training : When

6. The training of workers and their representatives must be **periodically repeated** in relation to the evolution of risks or the emergence of new risks.

4. **Training and, where foreseen, practical training must take place when :**

- ✓ An employment relationship is established;
- ✓ A transfer or change of duties takes place
- ✓ Following the introduction of new work equipment or new technologies ...

Legislative Decree n. 81 / 2008

Safety at the workplace

- Art. 37: Staff active training : Accountability

*14. The skills acquired following the performance of the training activities ... are recorded in the ... training booklet ... The content of the training booklet is considered by the employer for the purposes of **planning** the training and the supervisory bodies take it into account for the purpose of **verifying** the obligations referred to in this decree.*

Effective training

TRAINING PLANS - TRAINING *by* DESIGN

Training scope

TRANSFER OF

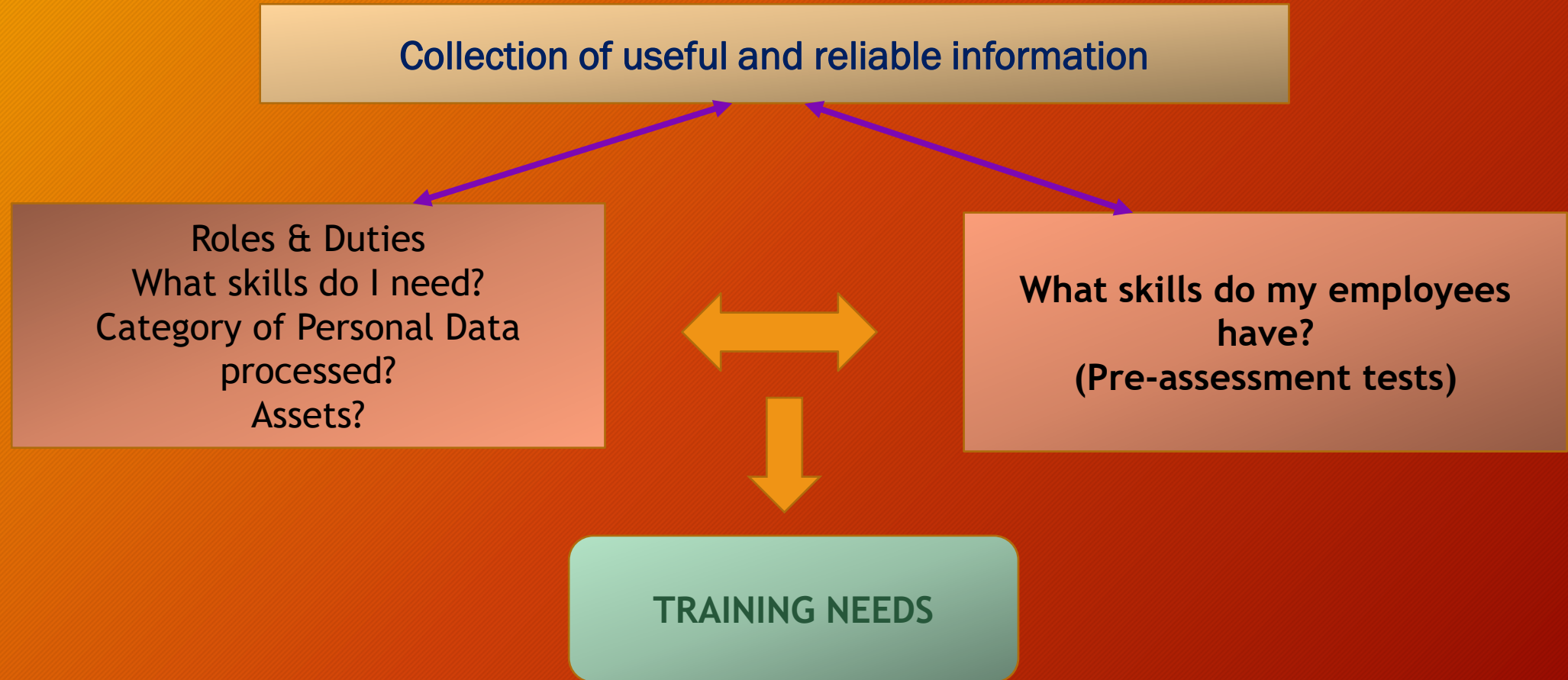
- ✓ Knowledge & competence
- ✓ Know-how & skills
- ✓ Behaviours

THE TRAINING CYCLE

Training by Design ...
... drafting a training plan



Needs analysis



Planning

- ✓ Macro Design
- ✓ Micro Design

Planning – Macro Design

Organizational goals: Data protection through accountable & customized training

- ✓ Who needs to be trained?
- ✓ Training onsite, online live, e-learning?
- ✓ Assessment methods & procedures (MCT, practical assessment, ...)
- ✓ Duration: one or + sessions
- ✓ Trainers

Planning – Micro Design

Didactic planning

- ✓ Who will join the training session: age, education, experience, employment contract, knowledge of the subject matter, previous similar courses attended, expectations, ...
- ✓ Define contents & degree of detail
- ✓ Define the teaching method
- ✓ Define tools and learning materials (slides, handbooks, ...)
- ✓ Define assessment tools
- ✓ Time needed (effective time + ½ hour + breaks accordingly)
- ✓ Trainer selection+ Trainer handbook (specific instructions)

Planning – Micro Design

Teaching method tips

- ✓ The learner must be at the center of the training activity
- ✓ Interactive approach: problem solving on specific and practical cases & procedures; teamwork, mootings, ...

Trainers

- ✓ Assess experience both as a trainer and in the subject matter
- ✓ CV

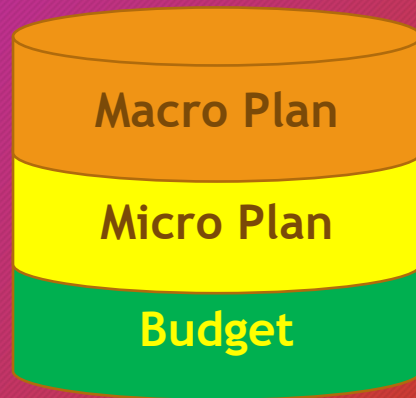
Planning – Micro Design

Training assessment

- ✓ During the training session (informal assessment)
- ✓ At the end of the training (formal assessment)
- ✓ Tests: closed (yes or no? MCT) & open questions
- ✓ Mistake individual revision (keep evidence)

Training plan for approval

The Plan



The
Board of
Directors



APPROVED

Awareness & the DPO

GDPR – art. 39, par.1, b)

(Life is hard...) 🤔

Awareness & the DPO

The Italian SRA's suggested Best Practices & Tips for the DPO

During the inspections carried out by the Authority a number of good practices emerged which it is considered useful to suggest. The DPO may propose activities to be carried out to improve the management of the processing activity in terms of regulatory compliance such as:

- ✓ Issuing **information documents** addressed both to the top management of the organization and to its employees and collaborators;
- ✓ **carrying out training and updating activities** aimed at people authorized to process data and **provide suitable documentation.**

Thank You !!!

More on training?
Feel free to contact me...

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