DELIVERABLE: Methodology for validation of SMEDATA Project's data protection learning

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Contents

I. Introduction to assessment of SMEDATA Project's learning activities

The SMEDATA Project aims at ensuring the highest degree of privacy and personal data protection through innovative tools for small and medium enterprises ("SMEs") and citizens. SMEDATA will organise a series of awareness and training events ("learning activities"), develop a self-assessment tool and a mobile application, disseminate and communicate project objectives and results.

Assessment of learning activities has two main goals:

(1)   providing personal feedback to the trainee,

(2)   evaluating the designed programme, the adopted methods and tools,

(3)   acquiring feedback from the users in order to update and develop the learning content– what works and what not; what are the general preferences for the teaching material to be comprehended, and to fulfil the main goal of raising-awareness

The first aspect of assessment concentrates on the trainee's performance in relation to the teaching content. It is meant to measure the trainee's effort, engagement and learning abilities invested into understanding the teaching content. Given the scope and the goals of the course, it should be concentrated on practical skills learned during the programme. Apart from providing feedback for the trainee, who will be able to measure his or her own achievement, this part will also allow to assess the efficacy of the entire training program. The final grades might be used in statistics in order to gauge the development of the training program (learning activities) and the influence of its modifications on the trainee's skills and knowledge.

The second aspect focuses on the quality of the designed course. It is proposed that it should be measured on the basis of two factors: (a) individual assessment

of the course as provided by trainees and (b) trainee's performance. The two factors should be co-related, because taken individually they cannot produce a full picture. Trainees' performance, analysed in itself, doesn't allow of abstracting from individual engagement and effort of participants, whereas their opinions on the course might not be sufficient in themselves to measure the extent to which learning goals are achieved. As a result, assessment of the course should be undertaken by including both factors. In this way a correlation might be found between the trainee's performance and his or her assessment of the course. This will lead to more independent approach and greater justification of the teaching objectives, and main activities behind the project.

The third aspect will primarily collect analytical data based on questionnaires and surveys over the feedback given by all users – both trainees and trainers/lecturers/. This feedback will monitor the overall performance of the training sessions. The results will be used to develop and update the learning content by taking into consideration what is more easily comprehended as compared to what is neglected or not fully understood and practiced by participants. Thus, this would give scope for further actions to be undertaken and expanded. The end-party feedback would be crucial for maintaining and sustaining the learning activities. One of the key objectives of the learning activities is to connect various natural persons in explaining the new data protection rules, and how they can easily detect and apply this knowledge in their everyday lives.

According to a broadly used methodology, assessment of learning activities might be undertaken at various stages:

1) during the development stage, to improve instructional courses or products (formative evaluation);

2)   during or immediately after the implementation stage, to measure the effectiveness of education, training and learning (summative evaluation); and

3)   sometime after the course has been implemented, to understand if it is still valid or needs to be updated or modified (confirmative evaluation).

According to the often used Kirkpatrick model[1], evaluation can encompass four levels:

1)   Learners' reactions: This level encompasses trainees' attitude to the course, their first impressions (encouraging or discouraging from continuing the course), the level of activeness, and participation which they display and take. Reactions might be measured with questionnaires and/or surveys, usually at the end of the course.

2)   Learning: This level concerns the direct achievements of a given course in relation to the goals it attempted to achieve. Knowledge and skills might be assessed separately or simultaneously. In digital non-formal teaching learning is usually assessed through test or assignments.

3)   Behaviour: This level measures changes in trainees' behaviour during the course as a result of the obtained knowledge and skills. Trainees might develop their path career, adopt new methods in their jobs, perform new tasks or simply carry out the old ones in a more informed and efficient manner. At this level, assessment allows of measuring the most practical effects of digital learning.

4)   Results: This level corresponds to the it attempts to measure the concrete objective results of trainees' new skills, language and behaviour. In this respect, the results section relates to the overall goals

[1] Kirkpatrick D.L. and Kirkpatrick J.D. (2006). Evaluating Training Programs. The Four Levels. San Francisco: Berrett-Koehler Publishers.

of the programme and measure its success. The results would be largely used also to work over and develop the learning activities and their content, in order to constantly improve it as user-friendly and choice-preferred to get to know more about privacy and data protection from a reliable source.

II.   Methodology of assessment for the data protection learning

Basing on the above-mentioned general remarks, the following methodology for assessment in the data protection learning project is proposed.

1.   Assessment should be performed with reference to the two following areas:

(a)   Trainees' individual performance,

(b)   Assessment of the learning materials and quality of facilitators.

2.   Trainees' individual performance should be assessed with the use of tests in order to maximise efficiency of performing learning and obtaining feedback.

(a)   As usual, assessment tests mainly consist of "closed- ended" questions associated with response options. They should use the methods of multiple choices, multiple responses, matching and ordering. Occasionally, in case of the most strategic concepts of the teaching content, the fill-in-the-blank method should be used.

(b)   At the end of the course, a general test should be provided, thus, users and trainers can check their performance, and to receive self-evaluation.

(c)   Questions should combine general questions, pertaining to concrete areas of data protection, with short case studies. Case studies should contain a description of a practical situation in the

field of data protection, a question about the trainee's desired reaction and a closed list of response options.

(d) An entry test is a recommendable option. It should be very brief and rely only on practical questions (for example, should the trainee demand a person's consent to processing personal data or doesn't have to do it).

3. Assessment of the course should be performed at the end of it. It is recommendable that it consists of two parts: the first one ensuing directly after the completed course and the second one which is performed approximately 4-6 weeks after completing the course. While the first one should be part of the training program, the second one should be accessed via a link sent to the participant in an automatic remainder e-mail message. With the use of two assessment tools, it is possible to measure not only trainees' reactions and increase in knowledge and skills, but also long-term effects of the course: gaining practical knowledge, changing one's behaviour, obtaining concrete results.

4. Assessment tools (Part one) should consist in closed-ended questions pertaining to:

(a) Trainee's general assessment of the course (very good / good / mediocre / bad / very bad / no opinion)

(b) Acquired skills of the participant (very good / good / mediocre / little / no acquired skills / no opinion)

(c) Usefulness of the course (very useful / useful / moderately useful / little useful / not useful / no opinion)

(d) Layout of the course (very good / good / mediocre / bad / very bad / no opinion)

(e)   Innovativeness of the course (very innovative / innovative / moderately innovative/ hardly innovative / not innovative / no opinion)

(f)   As well as open-ended questions on:

    i.   Biggest strengths of the course

    ii.   Biggest weaknesses of the courses

    iii.   Suggested improvements.

    iv.   Free remarks.

5.   Assessment tools (Part two, conducted sometime after completing the course) should consist in closed-ended questions pertaining to:

(a)   Trainee's general assessment of the course (very good / good / mediocre / bad / very bad / no opinion)

(b)   Usefulness of the course (very useful / useful / moderately useful / little useful / not useful / no opinion)

(c)   Acquired skills of the participant (very good / good / mediocre / little / no acquired skills / no opinion)

(d)   Application of the acquired skills in the trainee's practice (very often, often, seldom, rarely, never, no opinion)

(e)   Contribution of the completed course to the trainee's professional career (very much/much/moderately/little/no contribution/no opinion)

(f)   As well as open-ended questions on:

    i.   Biggest strengths of the course

    ii.   Biggest weaknesses of the courses

    iii.   What should be done in order to make the course more practically useful

         iv.   Free remarks.

         v.   Free remarks.

5. Assessment carried out according to the above principles should be analysed regularly by designers of the course. It is recommendable that the first round should take place as soon as feasible, e.g. 2-4 weeks after the course is delivered to the public. The outcomes should be scrutinised and lead to conclusions which retrospectively should determine the content and overall design of the course. If the first round of results is in general positive and conclude that the course is successful, yet, periodic and scheduled monitoring of feedback should be held, in order to deliver high-quality, regular, quick and efficient maintenance of the learning modules.

III. Initial design of SMEDATA's learning activities

The developed learning activities contain four Training Modules:

- Awareness raising for SMEs
- Training of trainers for SMEs and their associations
- Awareness raising for legal professionals working with SMEs
- Training of trainers for legal professionals working with SMEs and their organizations

The lecturers will impart knowledge about data protection to answer to the main challenge identified, namely the need of awareness regarding the changes in the Union and the respective EU Member-State legislation and their impact on the business.

The awareness raising Training Modules for both Target Groups will be focused on presenting an overview of achievable GDPR compliance by providing an opportunity for organizations to comprehend the basic standards and amendments in terms of terminology, organizational structure, and processes.

These Training Modules aim to create culture of awareness regarding the importance of (and consequences of not properly handling) personal data, including sensitive personal data.

As a follow-up activity, four dedicated two-days training seminars – two in Rome, Italy and two in Sofia, Bulgaria – will be organized. The aim of these seminars would be to introduce multipliers to the GDPR, namely a wide range of professional organizations of businesses and legal practitioners. The Participants would familiarize themselves with the skills they need to understand evolving data obligations and would be provided with practical experience through these intensive two-day workshops. In addition to knowledge about measures for achieving compliance with the GDPR, Participants will be prepared to help SMEs understand their existing obligations, implement appropriate systems for compliance and manage specific challenges as they arise. The workshops will be practical and interactive with plenty of time for discussion and group exercises including case studies. In addition, Participants would have the chance to discuss practical questions that have been raised during the Awareness Trainings for SMEs and legal professionals working with SMEs. In addition, these events would provide an opportunity to disseminate information about the current project development and some of the results that have been achieved.

Depending on the Target Group at which the respective training is aimed at, the content of the Training Sections will be tailored as to reflect the specific learning necessities of the respective Target Group. For instance, legal professionals will be provided with more information about the data-protection and privacy-related development of the European legislative framework and the relevant court practice of the ECHR and the ECJ, while with the representatives of SMEs the focus will be put on the practical guidance prepared at EU and national level by EDPB and national DPAs.

The organization and delivery of 24 regional awareness raising events (12 in Bulgaria and 12 in Italy) will be split equally between the two target groups – SMEs and legal professionals at SMEs. The expected number of participants to be reached within the 24 training events is 1600. Each training event is planned to last 8 hours, including one-hour lunch break, usually between 9 a.m. and 5 p.m. Half of the Training Sections, as described above, will take place in the morning, including a 30-minute coffee-break, and the other half, again including a 30-minute coffee-break, would be in the afternoon. These forums will be used as major dissemination and communication tools, for which organization the Partners will send several thousand invitations to potential Participants.

The Training Sections provided for hereunder reflect the gaps and needs identified throughout the Respondents' replies to the Survey questions. The Partners have agreed these modules would provide Participants with the necessary awareness, knowledge and skills to implement the requirements of the GPDR in their business activities and daily operations. It has been further agreed on by the Partners that the Training course would be divided into ten Training Sections aimed at a wide range of SMEs active in different fields and their legal professionals.

Each of the ten Training Sections would last approximately 45 minutes and would be followed by a short Q&A session, which will provide Participants with the opportunity to discuss data privacy issues of interest to them with the trainers. During these short Q&A sessions the content presented beforehand would be put in practical terms through the sharing of particular situations in the daily operations of SMEs which require the processing of personal data. Trainers would consequently share their experience in the capacity of data privacy professionals.

Lecture kits, presentation materials, information about practical issues and case studies, exercises, etc. will be provided to all Participants. Electronic copies of

the training materials, presentation slides and the schedule of the seminars to be organized by the Partners will be published on a designated section of the Project's website. An evaluation methodology will be developed as a tool to assist the Partners in adequately implementing a quality evaluation of the planned activities.