Co-funded by the Erasmus+ Programme of the European Union

MIND THE DATA

Innovative participatory approaches to learning about data protection in companies

Compendium

Contents

Introduction

The EU co-funded project **'mindtheDATA – Creating a data protection culture among SMEs'** under the frame of the European Commission's **Erasmus+** Programme (Duration: November 2019 – October 2021) combines the expertise of five EU countries through 7 organisations in Bulgaria, Greece, Spain, Poland and Cyprus, accounting for a high-quality, cross-fertilising approach and training interventions for SMEs drawing from diverse contexts both at national as well as intracompany, organisational level. The project **mindtheDATA** aims to promote the idea for SMEs to act towards how they can better comply with the GDPR, considering this as an opportunity for driving their business into innovation and differentiation, rather than if they are exempt from it.

The EU's General Data Protection Regulation (GDPR) came into force on May 25, 2018. It is not simply introducing, but enforcing a set of rules concerning privacy and data security. GDPR affects organisations and companies, virtually anyone holding data on EU citizens, creating a new data protection framework. GDPR expects broadly private sector SMEs to comply with the regulation. On the other hand, the GDPR framework doesn't want to put an extra bureaucratic burden on SMEs where it is not appropriate, bogging businesses and simply putting them on the defensive with imminent fines and non-compliance penalties. Along this vein, considering the new SME and business environment in the EU, it is of great importance to highlight how GDPR compliance for SMEs can function as a business differentiator for SMEs. Moving beyond the 'compliance-or-penalty' notion.

In this sense, the project is supporting business consultants as active facilitators towards this goal as they collaborate with SMEs in their standard support activities. The project wishes to make an intervention by the means of a set of tools, guidelines, practices to be used by business consultants to continuously support SMEs as parts of the European SME ecosystem to fully integrate the principles of data protection into their organisational culture and the mindsets of their human capital, not merely as a compliance element, but as a beneficial tool into their organisational culture.

To this goal, the project developed a modular set of online training material for business consultants (available in EN,BG, EL, ES, PL), covering the following issues:

- Pivotal, general aspects of the new data protection framework for EUs digital economy and society and the new SMEs environment;
- Integrated GDPR strategy according to their scope of activities and their GDPR 'readiness' - "data protection in EUs digital society and economy", "where does my SME stand and what should it do?", "data protection in everyday workplace".
- Training material to showcase the importance of GDPR for SMEs as a business differentiator, as well as the 'beyond compliance' multiple benefits for SMEs, which will methodologically transcend the training material as a whole, showcasing the four axes as mentioned above.

The online training provision is complemented by ***the Handbook*** for consultants to facilitate the use of the training material as an integrated provision adapted to the needs of SMEs (complemented by small-scale piloting among business consultants in the participating countries Bulgaria, Greece, Spain, and Poland). The ***Handbook*** is of high usability for consultants, VET trainers and facilitators, either as extra- or intra-company actors to support SMEs and staff in data protection issues as coupled with existing organisational structure and culture. Availability in EN, BG, EL, ES, PL guarantees impact as well as transferability on the potential for development in further languages.

The Handbook is be an elaborated guide serving two main objectives:

- The pedagogical aspect of the training provision accounting for the main axes of the methodological framework of the developed training material and the methodological path connecting the three thematic parts and their subjects in one training offer that can be followed either in a linear fashion or on demand by business consultants.
- The technical aspects of the training provision as available online and how to better exploit the online material as a curriculum for supporting SMEs.

The aim of ***this Compendium*** is to present innovative participatory learning methods that can be used to learn about data protection in companies.

*Read more about **mindtheDATA** project on our website.*
Go through the online training.
Follow us on Facebook.
Contact us here.

***mindtheDATA** project is coordinated by Yambol Chamber of Commerce and Industry in Bulgaria, and implemented together with Militos Consulting (Greece), the Business Support Centre for Small and Medium Enterprises – Ruse (Bulgaria), EQA HELLAS S.A. (Greece), Innovation Training Center (Spain), PAIZ Konsulting Sp. z o.o.(Poland) and RNDO (Cyprus).*

1. Inquiry-Based Project Methodology

SHORT DESCRIPTION

Inquiry-based learning is an approach to learning that emphasizes the learners' role in the learning process. Rather than the trainer telling learners what they need to know, learners are encouraged to explore the material, ask questions, and share ideas.
This approach might be particularly interesting for business consultants.

HOW TO USE IT

1. Learners must develop questions that they are "hungry to answer" (also so called "fat questions"). Have them develop a problem statement that requires them to pitch their question using a constructed response, further inquiry, and citation.

   Example: «Is Data protection a good thing for Innovation in companies?» Develop an enquiry-based project investigating how Data protection affects companies Innovation approaches.

2. Research the topic using time in class. It's crucial to have some of this be classwork so learners have access to the head researcher in the room—the facilitator. You aren't going to do the work for them, but you are going to guide them and model methods of researching reliably. Encourage them to take notes and identify the sources (reliable bibliography) to the key answers to our question «Is Data protection a good thing for Innovation in companies? ».

3. Have learners present what they've learned. Learners should create and present a culminating "something". Learners can develop a website using "Weebly", or perhaps a slideshow using Google Slides. Consider using a rubric.

BENEFITS/LIMITS

This methodology can bring many benefits: it provides learners the opportunity to develop stronger relationships with their classmates, improve their communication skills, and increase the confidence they have in their own ideas and ability to contribute to the classroom

TIPS

You can make this activity as long as you wish: a short 1-hour research and debate or a 3-4 hour activity including develop a website using "Weebly", or perhaps a slideshow using Google Slides.

For the assessment in Inquiry-Based Learning we hereby propose a set of strategies that can be combined:

- Formal and informal observations.
- Discussions, learning conversations, questioning, conferences.
- Tasks done in groups.
- Demonstrations, performances.
- Projects, portfolios.
- Peer and self-assessments.
- Self-reflections.

2. Panel Debate with Q&A

SHORT DESCRIPTION

Once participants are familiar with data protection in companies, you could implement a panel (group) debate with Q&A.

The exercise has 4 stages:
1. Preparation
2. Argumentation line
3. Debate
4. Change of perspective

HOW TO USE IT

1. **Preparation**: Divide participants into 2 groups. Explain to each group that they will have to choose a spokesperson.
2. **Argumentation line:** They have 30 minutes to read a list of actions enterprises could implement to innovate using data protection and prepare an argumentation line for each spokesperson to defend in the panel: Example of actions/scenarios:

   - **Product Abandonment:** *They can abandon the problematic product or idea to focus on others, that face fewer regulatory restrictions.*
   - **Compliance Innovation:** *They can innovate changes, to make the idea/product compliant, while preserving its basic architecture and value-proposition, e.g. by making default settings more privacy-friendly, or using anonymized data instead of personally-identifiable information. While we conceptualize compliance innovation as primarily about product design (i.e., own engineering work), it can also involve working with new suppliers to ensure that the*

final product is only built from regulation-compliant components and service.

- **Strategic Non-compliance:** *They can deliberately contravene the regulation, at the risk of running afoul of the authorities and facing punitive consequences (fines, closure, etc.)*

(Source: Martin, N., Matt, C., Niebel, C. et al, 2019)

Group 1. Benefits of the actions in the frame of Data protection. Presentation in 3 minutes (pitch)

Group 2: What would happen if these actions were not undertaken. Presentation in 3 minutes (pitch)

Group members who are not the spokesperson should prepare a list of questions to make the debate more challenging for the representatives of the other groups.

3. **Debate:** Ask the spokespersons to present results. Ask the spokesmen to present results (3 minutes each). Give each speaker 3 minutes (put a timer on) to present their argumentation. After the pitches turn to the audience and ask if they have any questions to the speakers. Give 1 minute for a question and maximum 2 minutes for each answer.
4. **Change of perspective:** Close the debate. End the exercise and ask participants to change the perspective, to stop looking from the point of view of the group they were in. Ask them which argumentation was the most convincing. If it was a TV debate who would have won? Make sure that participants understand that using only one activity would most probably never be enough to implement a real change.

BENEFITS/LIMITS

Upon completion of this activity, the participant will be able to:

- Identify the problematic issues regarding implementation of innovation in companies
- Argue and use facts regarding these issues
- Critically analyze and develop a deeper understanding of the issues developed in the training

RESOURCES

Suggested readings:

- Martin, N., Matt, C., Niebel, C. et al. (2019) How Data Protection Regulation Affects Startup Innovation https://link.springer.com/article/10.1007/s10796-019-09974-2

3. Brainstorming

SHORT DESCRIPTION

This is a technique used for finding solutions by means of stimulating ideas. A small group of people with or without conscious knowledge of the subject meets and contributes any suggestion or idea that strikes them, no matter how fantastic or impossible it may sound. All suggestions are encouraged and criticism is not allowed at this stage, although contributors are later invited to explain their ideas. Subsequently, all the ideas submitted are sifted and assessed.

HOW TO USE IT

Brainstorming is a large or small group activity that encourages learners to focus on a topic and contribute to the free flow of ideas.

1. The trainer may begin a brainstorming session by posing a question or a problem, or by introducing a topic.
2. Learners then express possible answers, relevant words and ideas.
3. Contributions are accepted without criticism or judgement and usually summarised on a whiteboard by the trainer or a scribe as the ideas are called out.
4. These ideas are then examined, usually in an open class discussion.

   Example: This technique can be used when discussing the topic suggested in the Card #1 “First…..follow your data!” in Unit 2 of Module 3 of the mindtheDATA training, i.e. How will personal data processing in learners’ organisations in 10 years from now? Which data will be collected and which will be not? How their protection will change?

BENEFITS/LIMITS

Benefits:

- It stimulates and provides varied instructional approach.
- Highly motivating.
- Increase task focus.
- Promotes spontaneity and creativity.
- Involves participants in ownership of ideas.
- Encourages creativity.

Limits:

- Time consuming
- High trainer skills required
- Some learners may not participate

RESOURCES

Suggested readings:

- Baumgartner, J. (n.d.). The complete guide to managing traditional brainstorming events. http://www.jpb.com/creative/brainstorming.pdf
- Baumgartner, J. (2005). Key factors to successful brainstorming. http://www.jpb.com/creative/keyfactors.php

4. Case Study

SHORT DESCRIPTION

This is a learning technique in which a real situation or series of events is presented to trainees for their analysis and consideration of possible solutions to the problems identified. Their findings can be compared subsequently with what actually occurred.

HOW TO USE IT

1. Provide learners with a real-world case to study (e.g. a description of a data breach). Alternatively, have learners find their own case to examine.
2. Individually, or in small groups, have learners analyze the case using guidelines and a framework provided by you (the instructor).
3. Have learners present their analysis to the class, or require groups to turn in written answers. If presenting in class, try to facilitate discussion such that learners connect the case with material in class.
4. After learners analysis has been completed, ensure that the group has concretely discussed how the case study illustrates application of theoretical or background concepts from course material.

   Example: Learners analyse a case study of a data protection implementation in a company.

they should answer which actions helped to protect the data and what could have been done better. More specifically, such case can be devoted to any of the data protection principles or, even more specifically, to the implementation of the data protection 'by design' and 'by default' (DPbDD) elements for each of the principles.

BENEFITS/LIMITS

Benefis:

- Provide concrete subjects for discussion
- Participants' experiences can be brought into use
- Provides opportunities for active participation
- Adaptable for for online learning.

Limits:

- Time consuming to produce good cases
- Difficulty in validating when there is no quantifiable solution
- Close relationship to 'real-life' may be difficult to achieve

RESOURCES

Suggested readings:

- Merriam, S. B. (1998). Qualitative research and case study applications in education. San Francisco: Jossey-Bass.
- Barkley, Elizabeth F. et al. Collaborative Learning Techniques A Handbook For College Faculty. Wiley, 2014. pp. 238-243.

5. Critical Incident

SHORT DESCRIPTION

Use problem situations to analyse advantages and disadvantages and possible solutions to a given situation.

HOW TO USE IT

1. Trainees are asked to recall an experience that happened in their workplace. The experience itself can be broad or very specific.
2. After they imagine the condition vividly in their head, they write the orientation part. This includes where, when, who, and what.
3. Trainees write the complication part consisting of the main problem of the experience.
4. They start to evaluate their experience.
5. They are asked to come up with key takeaways from revisiting their memorable experiences. First, they detail the outcome of the experience, whether it was something that they desired or not. Then, they are asked what additional things that they could do in that situation. After that, they are asked what will they do if the same situation happens again.

   Example: Learners can describe data protection breaches, if such situations have happened in their organisations.

BENEFITS/LIMITS

Critical incident technique maximizes the positive and minimizes the negative attributes of anecdotes, effectively turning anecdotes into data.

6. Small-Group Discussion

SHORT DESCRIPTION

Small-group discussions provide learners the opportunity to share ideas or opinions without having to address the entire class. Small-group discussions range in levels of structure. A simple small-group discussion asks trainees to divide into small groups and democratically discuss a prompt provided by the instructor. Groups often nominate a member to report highlights from their discussion to the entire group. Facilitating a highly-structured small-group discussion may take more planning but may also provide a richer and more inclusive experience for learners.

HOW TO USE IT

1. Break class into small groups. Each group discusses the topic or question on their own for a few minutes to generate arguments, answers, or ideas.
2. Once time is up, have each small group share one idea, answer, or argument with the whole group. Record ideas on the board.

   Example: Learners analyse a case study of a data protection implementation in a company. they should answer which actions helped to protect the data and what could have been done better. More specifically, such case can be devoted to any of the data protection principles or, even more specifically, to the implementation of the data protection 'by design' and 'by default' (DPbDD) elements for each of the principles.

BENEFITS/LIMITS

Use it when you want to...

- create an opportunity for learners to listen to and practice comments with a peer,
- increases learners' willingness and readiness to speak in a larger group,
- improve the quality of learners' contributions, or
- engage learners in a warm-up activity before a whole-class discussion.

7. 1-Minute Paper

SHORT DESCRIPTION

The 1-minute paper is a method in which learners are asked to take one minute (or more) to answer a question.

HOW TO USE IT

1. Provide learners with one question for brief reflection. Emphasize that responses should be concise.
2. Each trainee then records and submits their answers.
3. As needed, follow up on comments. Be sure to summarize and respond to any important questions or issues that arise in the learners' responses. (e.g. concepts that did not seem clear to learners).
   Example questions:
   - What was the most important thing you learned today/during this training?
   - What questions remained unanswered in your mind?
   - Of the concepts we learned (today), what would you NOT like to have to deal in a real-life situation?

BENEFITS/LIMITS

- Ending your training (day) with short writing assignments is a powerful way to assess the degree to which learners understood the presented material.
- Spontaneous writing also promotes confidence in writing quickly.
- 1- minute papers can also be used in the middle of lecture components if the group's concentration begins to wane.
- This is a great activity to use when:
  - You encounter a sticky/high-anxiety discussion topic. It allows learners to decompress and reflect on the topic and what happened in discussion.
  - Learners have just participated in an experiential learning activity, returned from a field

experience, or worked on a group project and you would like them to reflect on what they learned from the experience.

- Adaptable for online learning: online platforms will likely allow you to compile answers efficiently.

RESOURCES

Suggested readings:

- Bligh, D. A. (2000). What's the use of lectures? San Francisco: Jossey-Bass.

8. Complete Turn Taking

SHORT DESCRIPTION

This method can be used to discuss any topic or issue that remains unclear to the training participants.

HOW TO USE IT

1. Each trainee should be asked to bring a couple of questions to the training. These can either be questions to clarify, issues they think were left unresolved, or ideas or positions not yet considered.
2. Have the entire group arrange themselves in a circle. Alternatively, learners can be in small-medium size groups.
3. One trainee reads a question aloud. The trainee to their left then has one minute of uninterrupted time to speak and give their thoughts. This person signals that they are done speaking by saying, "OK, I'm done."
4. The next person to the left goes, has one minute of uninterrupted time to speak, and signals they are done by saying, "OK I'm done." Finally, the third trainee to the left goes, following the same pattern.
5. After three people have had a chance to speak, the conversation is opened up to the whole group for two minutes of discussion.
6. The next trainee gets to ask a question, and this cycle continues.

BENEFITS/LIMITS

A benefit of this activity is that it allows students to speak uninterrupted. It also allows the students to work through some of their issues, questions or concerns with the text together.

9. Group Text Reading

SHORT DESCRIPTION

Reading text in a group to increase its comprehension.

HOW TO USE IT

1. Select a ‘”difficult” text or passage. Break the large text up into 1-2 paragraph sections.
2. Break students up into groups of 2-4. Give each group of students a different section of the text/passage.
3. Give the students time (~15-20 minutes) to read through and discuss their section of the text. If possible, give students guiding questions such as: What is happening in this section? What is the important take-away point? What might be important for me to know later?
4. Bring the class back together. Each group (starting with the first part of the text) presents their section to the class.
5. As students present, the instructor should write/draw on the board, correct and add to student responses, and provide examples as needed in order to help tie the concepts together.

Example: this method is good for studying the GDPR original text.

BENEFITS/LIMITS

- This activity can help the students feel like the text is more manageable. It can also model to students what they should be doing when reading a text.
- Group text reading provides an opportunity for students to practice communication skills.
- Adaptable for online learning.

10. Respond, React, Reply

SHORT DESCRIPTION

Another method that increases understanding of a subject matter by exposing the learner to other learners' insights.

HOW TO USE IT

1. Break students up into small groups.
2. Provide students with a prompt. The prompt can be a targeted question, written passage/text, or argument.
3. Each student then responds to the prompt on their own in writing. After each student has had a chance to write their response, have them read and share their response with the group.
4. Each student then reacts to each of the other group members' responses.
5. Then, the student replies to each of the reactions to their own response.

BENEFITS/LIMITS

- In creating your prompt, make sure it cannot be answered with a simple "Yes/No." Try to create questions that will generate discussion.
- Be sure clear expectations and structure are provided to the students (e.g. how long responses/reactions/replies should be, as well as the structure they should take; how this activity will be evaluated; reminders of classroom rules; etc.).
- It iss a great activity for online classrooms. If a student is delayed in responding/ reacting/replying, the instructor can give "behind the scene" nudges.

11. Social Annotation of Text

SHORT DESCRIPTION

Learners annotate the text they are studying. This method can be used for studying the text of GDPR.

HOW TO USE IT

1. Select a text for the groups to annotate.
2. Select a platform for performing the social annotation, such as Google Drive, eMargins, or ClassroomSalon.
3. Have at least one learner from each group bring a computer to class (ideally, all students would have access to a computer). In small groups, have learners annotate the text. Encourage them to reply to each other's posts as well.

BENEFITS/LIMITS

- Annotation increases memory and learning, and improves reading comprehension. This activity allows learners to practice the activity of annotating a text, taking notes, and analyzing the text as a group. It can be run during a tutorial, in a class during lecture, or outside of class time as preparation.
- In an online setting, this could become an individual activity as well.

RESOURCES

Suggested readings:

- Kalir, R., Garcia, A. (2021) Annotation. Cambridge, MA: MIT Press.

12. Jigsaw Discussion

SHORT DESCRIPTION

A general topic is divided into smaller, interrelated pieces (e.g., a puzzle is divided into pieces). Each member of a team is assigned to read and become an expert on a different topic. After each person has become an expert on their piece of the puzzle, they teach the other team members about that puzzle piece. Finally, after each person has finished teaching, the puzzle has been reassembled, and everyone on the team knows something important about every piece of the puzzle.

HOW TO USE IT

1. Divide learners into 5-7-person jigsaw groups.
2. Appoint one learner from each group as the leader.
3. Divide the learning content into 5-7 segments.
4. Assign each learner to learn one segment.
5. Give learners time to read over their segment at least twice and become familiar with it.
6. Form temporary "expert groups" by having one learner from each jigsaw group join other learners assigned to the same segment.
7. Bring the learners back into their jigsaw groups.
8. Ask each learner to present her or his segment to the group.
9. Float from group to group, observing the process.
10. At the end of the session, give a quiz on the material.

Example: Can be used for studying Unit 3 of Module 1 of the mindtheDATA online course: "GDPR principles" (or any other source on the seven principles for the lawful processing of personal data, the GDPR itself being the first one).

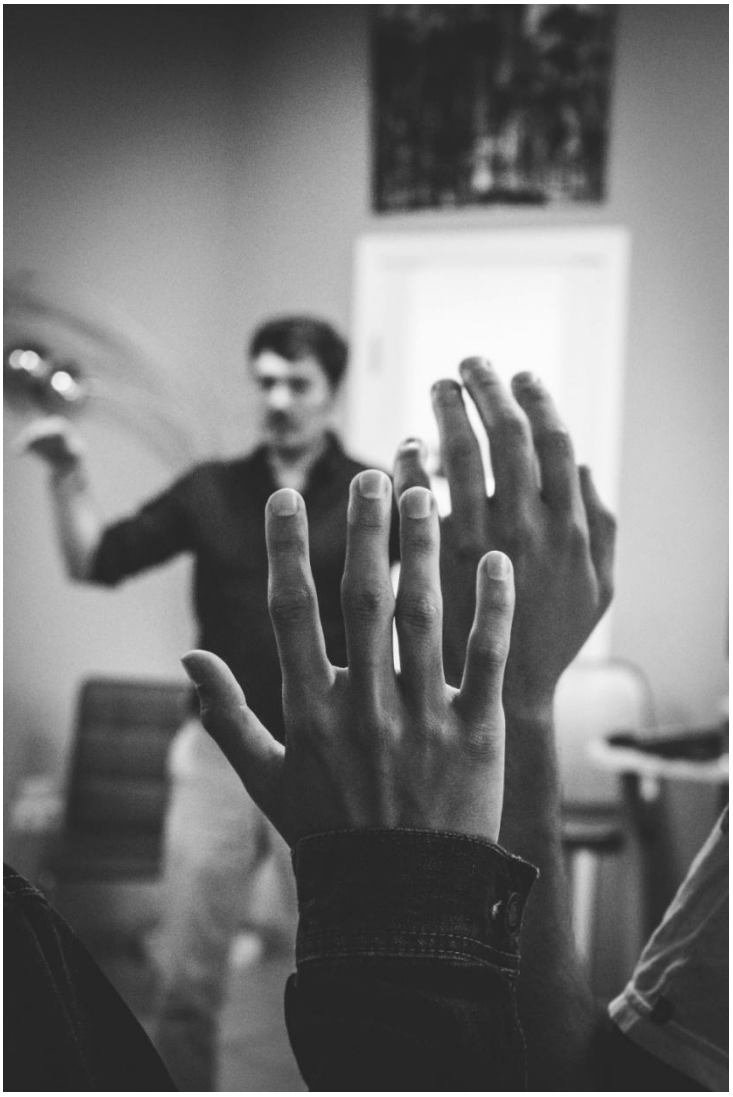
BENEFITS/LIMITS

- It helps build comprehension.
- It encourages cooperative learning among learners.

RESOURCES

Suggested readings:

- https://www.jigsaw.org/



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