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CNIL International Enquiry concerning Initiatives Conducted by Data Protection Authorities with Regard to Digital Education

Final Summary Report

With the support of the CNIL

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Background Information

Following the 35th International Conference of Data Protection and Privacy Commissioners held at Warsaw in 2013, a working group, run by the French authority, was entrusted with implementing the operational objectives defined in the "*Resolution on Digital Education for All*", adopted on 24th September 2013.

Meeting at the time of the 7th General Assembly of the AFAPDP – *Association Francophone des Autorités de Protection des Données Personnelles* – in Marrakesh in November 2013, the *francophone* authorities also adopted a "*Résolution pour promouvoir une éducation au numérique pour tous*" ["Resolution for the Promotion of Digital Education for All"] and decided to take part in the work of this international group.

To date, 28 authorities have joined the working group and 9 other authorities wish to be kept informed of the progress of its work and results *(cf. geographical distribution and detailed list in the appendices).*

A roadmap was submitted to the working group, at the initiative of the French authority, with a certain number of proposed initiatives, including the undertaking of an international enquiry for the purpose of **drawing up an inventory of the available initiatives and resources aimed at raising the awareness of young people and the public at large about the uses of digital technology and assessing requirements in this regard.**

This international enquiry thus pursues a double objective, on the one hand, that of establishing a precise picture of the national actions and initiatives undertaken by the data protection authorities with regard to digital education (awareness, training, types of media, key partners) and, on the other hand, that of having the benefit of this feedback in order to define a common digital education action programme by the time of the next International Conference in 2014.

At the end of February 2014, the French Authority therefore sent a questionnaire *(cf. Appendix 1)* to the whole accredited authorities, asking them to respond within a deadline of three months.

This questionnaire comprised three questions which were respectively aimed at:

1. collecting the experiences, materials and media resources developed by the personal data protection authorities, within the framework of campaigns of awareness-raising and training in digital education, conducted either independently, or in partnership with other key (public/private) actors;

2. initiating a quantitative and qualitative assessment of these initiatives;

3. establishing a list of national digital awareness policies.

38 data protection authorities replied[1] (out of a total of 98 accredited members of the International Conference - including 33 regional authorities- 3 observer authorities of

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[1] Of which 36 questionnaires

the Conference and 4 *francophone* authorities of the AFAPDP not officially accredited by the Conference) *cf. geographical distribution below).*

Responses of DPAs by Geographical Area

- Asia-Pacific 6%
- Latin America 6%
- Africa 8%
- North America 11%
- Europe 69%
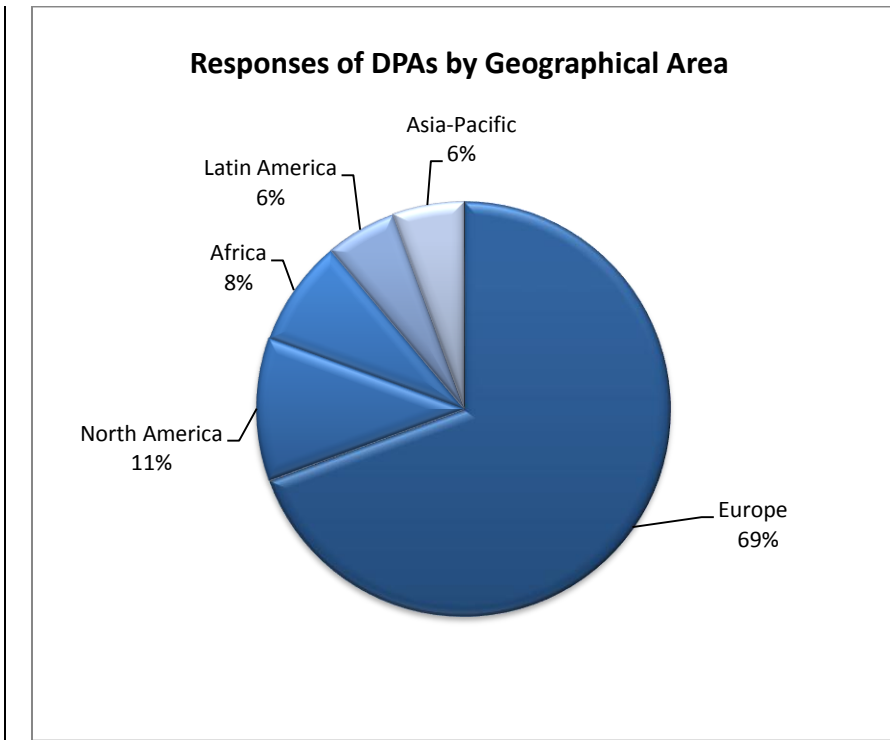
Responses are still expected in particular on the part of authorities having significant experience with regard to digital education.

This report therefore constitutes an initial summary of these extremely rich and varied responses. In order to bring out the main lines, a classification of types of resources and educational initiatives has been made according to various criteria, highlighting similar experiences aimed at young people, the public at large and the initiatives which appeared the most original, as well as initiatives conducted in cooperation with the Authorities (cf. 4 appended detailed tables and graphs).

The detailed responses are available and appended to the main Report in the form of another analytical table per authority and classified (by geographical zone[2], target audience, initiatives in partnership etc.), in accordance with the questionnaire topics.

This report and the corresponding detailed tables are subject to rereading by the contributors to the questionnaire for any corrections or additions.

Finally, in the conclusion of the report recommendations are made aimed at creating synergies between the data protection authorities, in order to take advantage of the best education and training practices for online privacy protection.

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[2] NORTH AMERICA – ASIA-PACIFIC – LATIN AMERICA – AFRICA – EUROPE

I.   PRINCIPAL FINDINGS OF THE STUDY

In the light of the answers given by the data protection authorities, several findings emerge from this international study.

In the first place, the data protection authorities have, quite naturally, aimed to their education and awareness-raising initiatives at young people in priority, making use of an array of tools and media, of course, including the Internet medium. In this respect, training actions for teaching staff were prioritised by a large number of authorities and many have established partnerships with public and private actors. Finally, one can only note that few indicators are currently available in order to assess the effectiveness of the awareness-raising actions undertaken.

A.   Privacy Protection Education for Young People: a Priority for Data Protection Authorities as a whole

The vast majority of data protection authorities having replied to the questionnaire have undertaken awareness-raising campaigns, more particularly devoted to the target of children – minors and adolescents – families and schools. Thus more than 70% of authorities have created websites for young people. Similarly, authorities having replied to the questionnaire have developed initiatives in schools, established a presence at trade fairs aimed at young people (31%) and introduced other forms of awareness-raising such as competitions, comics, cartoons and videos (36%). It is to be noted that the "youngest" authorities, created in recent years, were extensively involved in this approach. On the other hand, few authorities mentioned other targets: seniors (apart from parents and teachers), companies and professionals.

Among an array of educational tools, ranging from the most traditional to the most innovative, Internet is of course used extensively by the authorities in order to disseminate their awareness-raising messages, to young people in particular, whether by means of websites or pages on the social networks, as well as videos and serious online games (60%).
It is thus a matter of making use of the same communications media as those used by young people, drawing inspiration from their practices with regard to use of the social networks. Overall, although the Internet medium is becoming predominant in the array of resources, it nevertheless remains coupled with the use of more "traditional" communication media such as TV campaigns, radio broadcasting of scripted clips and messages (36%) and the written media more routinely distributed by the authorities (43%). On the other hand, it is to be noted that very few authorities indicated that they have made use of new forms of educational initiatives, such as MOOC (massive online open courses), of which there have been none to date, and a single "webinar" initiative in direct liaison with school networks in addition to webcast seminars. Finally, an original and media-friendly initiative is to be noted, used by a few "young" authorities in order to attract young audiences, who are naturally little-inclined to visit the official websites of authorities and institutions: making use of personalities known to the public at large and young people, in order to echo the authorities' messages. Thus famous writers and popular singers were invited to take part in awareness-raising campaigns, as "Privacy Ambassador" VIPs. Initiatives

which should be closely followed with regard to feedback, their impact and their capacity to give our authorities a less institutional image?

B. Training of Educational Staff: initiatives undergoing marked expansion

More than half of the authorities (20) have elaborated "ready-to-use" courses, training seminars and books aimed at the community of educational staff (teachers and directors), thus offering them privacy awareness-raising educational content to be included in school programmes. In particular, these include resources that are adaptable according to the age of the pupils, designed in the form of booklets and packs of topical pedagogical fact sheets aimed at helping teachers to approach these subjects with young people. For example, they provide class exercises in which paired students determine, on the basis of personal profiles, what personal information (age, hobby, addresses, personal telephone number, illnesses, password etc.) can be shared with which persons (friends, teachers, doctor, neighbours, clients, in a cafe etc.), the teachers are then thus invited to engage in exchange and comment with the pupils as a whole with regard to the answer sheets and to encourage role-playing in order to verify the information that is indeed appropriate for the right persons. To date, these various different modules appear to be used on an occasional basis. With a view to bringing such initiatives into general use, it would be worthwhile to produce specific and co-ordinated modules on the right to the protection of data and privacy, with which trainers can be provided within the framework of in-service/continuing training.

C. Assessment of Digital Education Practices: Limited Availability of Homogenous Indicators

In view of the responses, few authorities appear to have assessed the effectiveness of their initiatives. Yet how should assessments be conducted? Which indicators should be used? The authorities that provided responses on this point for the most part (two thirds of the latter) mention indicators based on figures: results of measurement of TV audiences, numbers of visits to dedicated websites, viewing rates of videos and tutorials, as well as the numbers of initiatives in school environments, pupils and teachers reached and documents distributed. Only 4 authorities mentioned more qualitative assessments, e.g. with regard to satisfaction feedback following adult training seminars and the launch of publication of educational tools aimed at young people connected to the quality of websites, for the purposes of improvement.

On the other hand, no assessments based on assessment tests among young people themselves, or upon feedback from teachers, were found. It would be worth going into greater depth with regard to this first finding, which it appears should lead the authorities to try to define a method of assessment and relevant common indicators together, and to compare their feedback with regard to these aspects. For example, it is not only a matter of analysing these quantitative indicators with regard to other indexes of website visits, but also of making use of assessment surveys

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among selected targets, and of taking the analyses of experts in learning sciences and training into account.

D. Public Policies and Partnerships with the Authorities: Data Protection is attracting real interest of which the long-term durability still needs to be established

Unsurprisingly, the whole of the authorities that replied noted that, overall, all of their respective governments have undertaken strategic digital development plans or incorporated the latter into their political agendas. Digital education of course constitutes a priority initiative for numerous States. For some of them, this appears as a digital skills acquisition pack, as well as by targeted programs for the protection of children online / or the fight against cyberbullying. It is nonetheless much rarer to find any mention of a data protection constituent within e-learning and in-service/continuing training programmes. Approaches based on privacy-aware digital citizenship have to date only found openings in rare public consultations. In order to be heard, the authorities concerned place their recommendations for providing the public at large with sound digital knowledge, in the service of market confidence, productivity and digital growth.

Conversely, it is interesting to note that a majority of authorities (20) state that they have established partnerships with the public authorities, and in particular, with their respective national Ministries of Education in order to disseminate personal data protection training content, aimed at pupils according to age and the nature of the subjects taught, at both the national and regional levels. For all that, there is no shortage of agreements with the private sector and half-public, half-private agreements, insofar as close to twenty or so authorities have been identified that are cooperating in common initiatives in favour of protection on the Internet and the promotion of educational resources in national competitions, for example, or are involved in national and private digital and Media training organisations.

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## II.   OVERALL ANALYSIS OF THE 3 QUESTIONS

A.   ACTIONS AND MATERIAL (Question 1)

This question concerned the whole of the actions and material developed by the authority, individually or in association with other actors, that is to say: awareness-raising campaigns, tutorials, education packs, videos, games; types of audiences targeted (children, young people, students, schools, teachers, parents etc.); the languages in which the resources are available and any useful web links.

1.   Awareness-Raising Initiatives among Young People

The national authorities mentioned a wide range of different initiatives and educational tools aimed at raising young people's awareness of the importance of protecting their privacy online when using social media and other digital technologies. These efforts, specifically aimed at the social category of young Internet users, bear witness to the authorities' mobilisation directed at this target group over the last several years.

This range of resources includes the creation of young people's websites/web platforms dedicated to Internet practices, educational games, videos, clips, cartoons, self-assessment tests, initiatives and events in schools, competitions for young people and educational resources for pupils and the teaching community – booklets, leaflets, posters, youth magazines and comics.
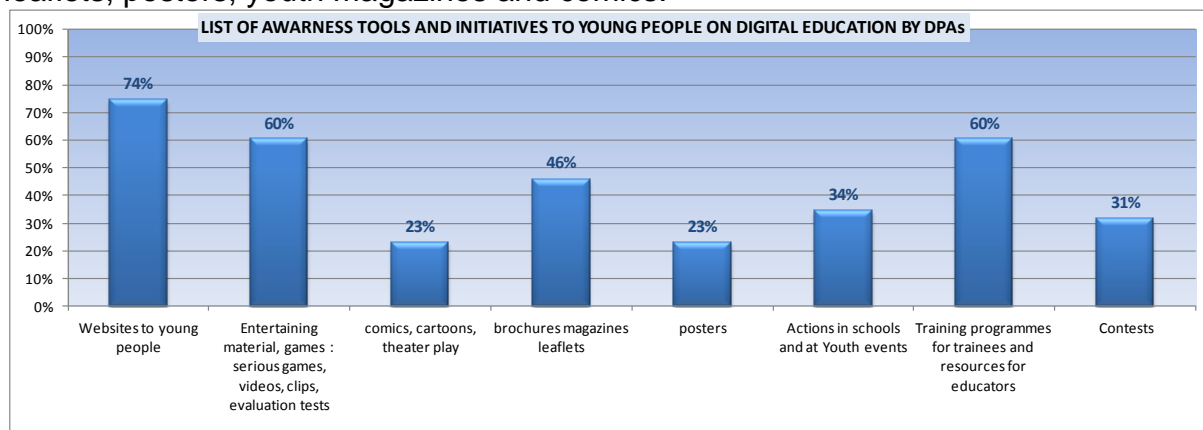
The Creation of Youth Websites/Educational Platforms concerning Internet Practices constitutes one of the authorities' essential tools, in support of major awareness-raising campaigns and the launching of interactive aids: indeed 74% of the authorities (i.e. 26) that replied to the questionnaire have a website of this kind. These websites offer a wide range of online resources, interactive educational tools and advice fact sheets which can be consulted and downloaded. In order to facilitate access to the supply of services and content, they are often classified according to target audience, into sections devoted to young people, in particular, as well as to parents and teachers; several authorities thus mention approaches of this kind (*the Belgian, Canadian, American, Hong Kong, British, Spanish, French, Estonian and Macedonian authorities etc.*).

The creation of fun educational material in the form of serious games, videos, clips, topical self-assessment tests (online quizzes) constitutes a much-used medium

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since it represents 60% of responses (*the authorities of the Provinces of Catalonia, of Ontario, Albania, Croatia, Gibraltar, Greece, Hungary, Ireland, Italy, France, Mexico, Macao, Switzerland and the United States etc.*); This comprises an entertaining manner of presenting situations (publication of videos of imaginary evenings, mazes for finding out on which websites a photo posted online is likely to be found, tests showing the multitude of ways of modifying an original photograph following successive downloads, a scenario illustrating the quantities of data that we leave on the Internet every day through everyday actions (in cybercafés, publishing the photos of a party on one's favourite social network website, ordering clothes and books online, playing an online videogame with unknown persons etc.). Good practices for building an online identity and protecting oneself from the risks arising from new technologies and social media (scripted messages from young people aimed at other young people, reminding them to "think before you click" and control their online information) are also set out. These online and paper media resources as a whole are available for use in educational plans as part of awareness-raising activities and programmes with pupils and can also, of course, be consulted by young people themselves. The quiz results are in general accompanied by final recommendations at the end of tests. Use of these online tools can be counted (number of pages viewed, downloads per month, per year, length of viewing etc.).

The production of written paper format materials (which may also be made available in electronic format) aimed at young people and pupils such as booklets, magazines and leaflets for young people and posters, as well as comics, cartoons and theatrical plays, highlighting advice and recommendations, by means of an entertaining educational approach, accounts for 46% (16 authorities), 23% (5) and 23% (8) of responses for each item. In general, these paper format materials emphasise detrimental behaviours on the Internet and, in particular, on social networks, providing key answers in the language of very young children and teenagers. They are distributed to pupils, teachers and parents, by the authorities, within the framework of initiatives in schools and days devoted to the topic of data protection. The creation of comics, cartoons and theatrical plays have been developed by 6 authorities in particular (*Canada, Croatia, Belgium, Estonia, Spain and Switzerland*). It is to be noted that the Canadian comic encountered great success in its dissemination and has been translated by other authorities, in particular, by its Hungarian counterpart (downloadable on its website). Similarly, several authorities (*France, Province of Quebec*) noted continuing high levels of demand for young people's posters that put forward 10 key recommendations, distributed in classes in particular.

Initiatives conducted by the authorities in schools and libraries, as well as within the framework of events aimed at young people (e.g. careers fairs), today constitute a means of action and raising awareness that is used by 34% of authorities (12) and appears to be meeting with great success. This is demonstrated, according to these authorities, by the increase in the number of requests made by other classes within the same educational establishments and by new schools volunteering to host data protection training courses as from the following year. In this respect, certain authorities nonetheless pointed to a limit in terms of human and financial resources in order to face up to the increased number of requests for actions in school environments, which are difficult to cover for the national or regional territory as a whole. It is to be noted that other authorities have chosen to extend their field of

action by organising a presence at fairs aimed at young people and through meetings in educational premises such as libraries (*the authorities of Canada, the Province of Catalonia, and Croatia*).

The creation of modules, courses, (online) educational programs and manuals on privacy aimed at teachers appears to be quite widely developed by the authorities (60%, i.e. 21 of the latter). This trend, which appears to be coming into general use in relation to the teaching community, is aimed at making available, either <u>presentations that can be adapted</u> to teaching programmes (developed in particular by the authorities of *Albania, Belgium, Bulgaria, the Province of Catalonia, Spain, Finland, Hungary, Ireland, Macedonia, Mexico, Poland, the Rhineland-Palatinate region and Switzerland*), or <u>ready-to-use course materials</u> according to class levels (resources created by the authorities of *Canada, the Province of Ontario, Colombia, Gibraltar, Great Britain, Hong Kong, Ireland, Macedonia, Mauritius, Mexico, Moldavia, the Rhineland-Palatinate region and the United States*). No mention is made of any MOOC (massive online open courses); the Greek authority is the only authority making use of a webinar connecting schools, the data protection authority and the administration together with the Authority of Hong Kong making use of Webcast seminars.

It therefore appears that more than half of the authorities have given priority to this type of initiative, which presents the advantage of organising the raising of awareness of privacy protection and the keys to understanding digital risks for all pupils in programmes. The enquiry reveals that these initiatives are the fruit of either cooperation with the national or regional academic authorities, or of the initiative of the authorities alone, which have produced resources corresponding to the targeted training levels (primary and secondary).

This survey also shows workshops and seminars put in place for the **training of trainers**, the targets and contents of which remain to be specified (the authorities of *Albania, the Province of Catalonia, Croatia, Great Britain, Latvia, Macedonia, Mexico, Poland and the Rhineland-Palatinate region).*

The creation of teaching resources with the assistance of education and communication professionals alongside the authorities: it emerges from certain contributions on this subject that, although the incorporation of courses and modules into educational programmes constitutes a new means of raising awareness, which is making marked progress, as noted above, ensuring the accessibility of resources to young audiences requires real educational know-how. To this end, 4 authorities in particular (*Belgium, Great Britain, Hungary and the Rhineland-Palatinate region*) stated that they had called upon professionals from the educational world and communications consultants, educationalists and sociologists as well as educational mediators in order to construct contents adapted and adaptable to various age groups, which can be reused as aids by teachers.

The organisation of competitions on digital education privacy for young people in primary and secondary schools and higher education constitutes a relatively well-developed means of raising awareness, since it is mentioned by 31% of respondents (i.e. 11 authorities).

Competitions aimed at attracting young people's attention and encouraging them to explain the measures to be taken in order to protect their privacy in case of use of new technologies, social networks (*the authorities of Italy, the province of Catalonia and Canada*), mobile apps (*the authorities of Poland and Hong Kong*), or to cast light upon the universe of privacy in the 21st century (*the authority of Ireland*). These practice situation approaches may comprise the making of documentaries and videos (the authorities of *Hong Kong* and *Ireland*), technological aids and photos, including artistic and literary media illustrating the protection of privacy in a digital world (*the authorities of Albania and Bulgaria*) and the completion of poems and stories relating to the Internet and privacy, the first lines of which are provided by famous authors (the authority of *Croatia*).
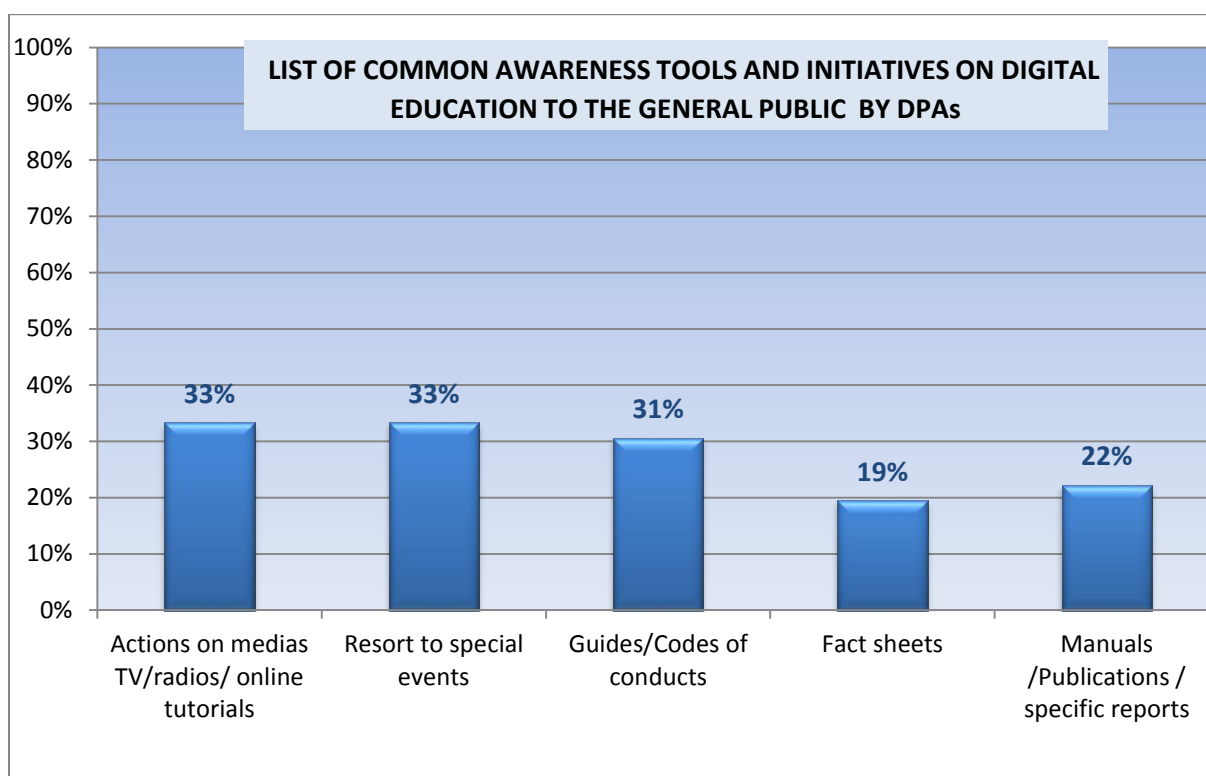
These initiatives provide an opportunity for both raising the awareness of the young people who take part in the competitions and providing information to as well as cooperating with schools and their teaching teams, while enabling the authorities to extensively promote the initiatives and media for which the prizes are awarded and, of course, increase their visibility.

It is interesting to note that external partners, sponsors and/or service providers, are sometimes involved in putting these competitions in place, taking care of their organisation in various different capacities (financial, logistic etc.) alongside certain authorities (e.g.: Google *in the case of the Irish authority,* Facebook *in the case of the Croatian authority* and a firm of consultants *in the case of the Italian authority*). Nevertheless, other authorities have chosen to organise these types of events alone (*Albania, Spain and the province of Catalonia*).

The launching of competitions and the awarding of prizes often forms a part of the media initiatives conducted at the time of the European Data Protection Day on 28th January.

2. Awareness-Raising Initiatives Aimed at the Public at Large

Media initiatives conducted by the authorities aimed at the public at large principally refer to the broadcasting of TV commercials, radio programmes and the organisation of events – conferences, open days and debates. Similarly, they rely upon the publication of written materials, reference works that can be used by the public at large, guides, codes of conduct, topical information fact sheets, topical study reports on key aspects of the Internet for children, with the data protection authorities, and comparative analysis of experiences concerning data protection education in Europe.

LIST OF COMMON AWARENESS TOOLS AND INITIATIVES ON DIGITAL EDUCATION TO THE GENERAL PUBLIC BY DPAs

Actions on medias TV/radios/ online tutorials	33%
Resort to special events	33%
Guides/Codes of conducts	31%
Fact sheets	19%
Manuals /Publications / specific reports	22%

The broadcasting of spots on TV/Radio stations constitutes one of the "traditional" means of raising awareness, with a broadcasting cost that has a measurable audience impact. Although 33% of authorities (12) indicated that they have given priority to this type of media for broadcasting video and radio clips, within the framework of campaigns on national TV channels and radio stations, it is to be emphasised that opportunities for repeat broadcasts are henceforth increased by the possibilities provided by the Internet.

In general, these video media offer messages and scenarios of between 30 seconds and several minutes, broadcast over periods of several days at peak audience times, aimed at a wide audience. In this respect, the interesting initiative undertaken by the *Romanian authority* should be noted, which organised the broadcasting of such videos in public and school transport, thus making it possible to reach adults, in addition to the audience of young people.

For their part, online video tutorials are posted on the authorities' institutional websites – and can be accessed in the website areas for both young people and teachers. They disseminate practical advice, on the following technological subjects in particular: *"configuring one's options on the social networks", "browsers", "cookies", "the use of smart phones" and "mobile apps", "changing of the password", "Wi-Fi", "geolocation"* (authorities of *Spain, France and Hong Kong*).

The provision of written materials for the public at large in the form of guides, practical and educational information fact sheets, codes of good conduct, manuals and reference works in paper and downloadable electronic format is also organised, but on a smaller scale; a quarter of respondents (i.e. 10 authorities) indicated that they distribute guides and codes of conduct, and practical information sheets in the case of 19% (7 authorities), which are increasingly downloadable on the authorities'
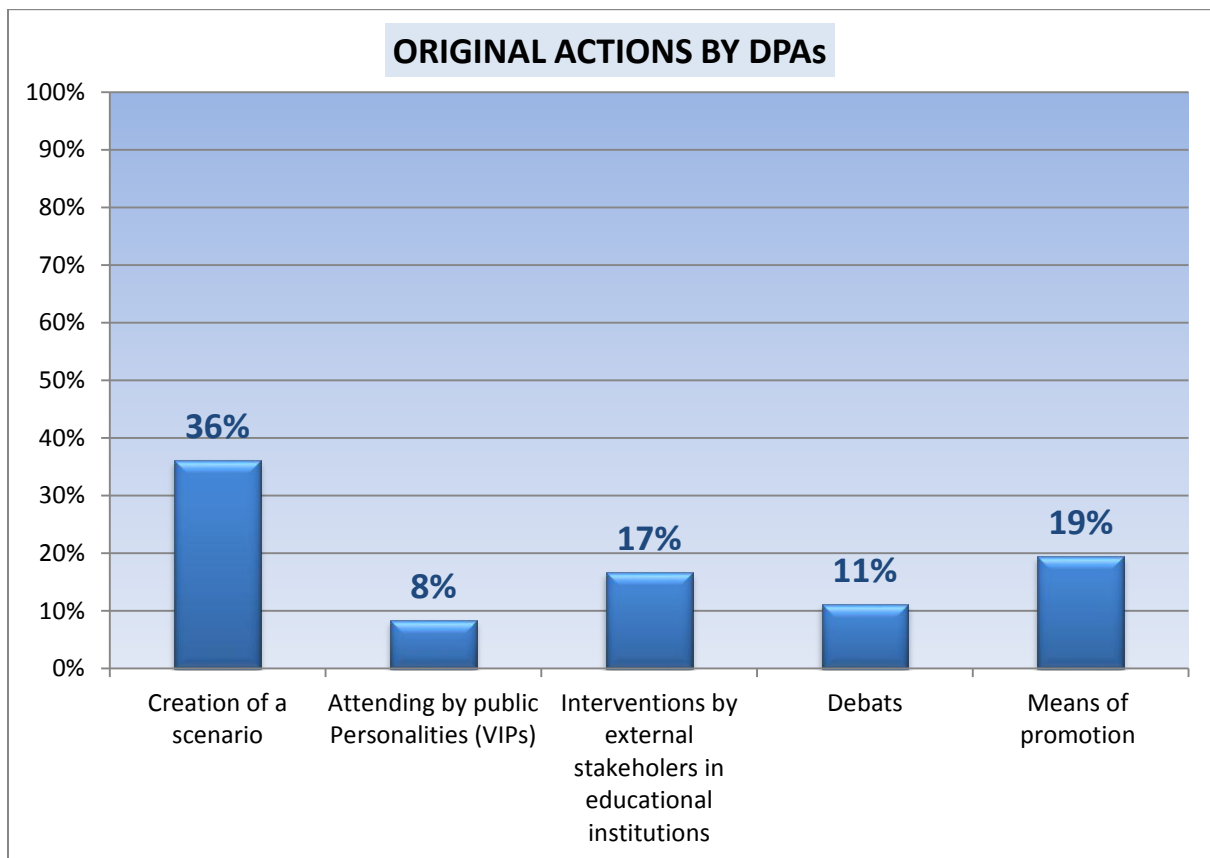
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websites. Specific works and reports relating to digital media use practices with regard to privacy, represent 22% of the resources mentioned in the case of 8 authorities.

The success of the reference work written by the Irish authority is to be emphasised: "*Sign up, Log In, Opt Out-Protecting your Privacy & controlling your Data*" produced in cooperation with the Ministry of Education and aimed at the educational community, as well as the public at large. Several authorities mentioned this work or have translated it. The manual is aimed at raising young people's awareness of their right to privacy, of the importance of taking control of their personal data and of their rights. It presents the role of technology in daily life and the practical implications thereof in terms of privacy. It also provides a medium which can be adapted in terms of training at several teaching levels (primary and secondary) within the framework of education packs.

Two studies mentioned and published in 2013, by two newly formed authorities in Europe, are interesting in terms of their analyses; one at the level of awareness and practices among young people with regard to Internet risks, conducted by the authority of Hungary in its country with a focus that takes the good practices of several data protection authorities into account; and the other, for its analysis of the integration of subjects and teaching with data protection, as well as with fundamental rights in countries both within and outside Europe, by the Macedonian authority.

3.   Original Initiatives on the Part of Authorities

Certain authorities have introduced original initiatives such as the creation of cartoons, comics, theatrical plays and national competitions as well as participation in fairs and exhibitions, mentioned in detail earlier in the report.

ORIGINAL ACTIONS BY DPAs

The bar chart titled "ORIGINAL ACTIONS BY DPAs" shows the following values:
- Creation of a scenario: 36%
- Attending by public Personalities (VIPs): 8%
- Interventions by external stakeholers in educational institutions: 17%
- Debats: 11%
- Means of promotion: 19%

The means of promotion of these media may also have an original character in order to make an impact upon the various different young target audiences, their family and educational environments and media generally speaking. Use of original channels of communication (*cf. infra*) was identified at a level of 19%, in view of initiatives undertaken in a more widespread manner by authorities. It appears that it was partly the newly formed European data protection authorities (*Croatia* and *Hungary*) which introduced innovative media-friendly approaches (famous personalities known to young audiences, "Privacy Ambassadors") in order to reach this target audience of young people.

2 authorities used famous singers, popular music groups or writers as Privacy Ambassadors; the Croatian authority thus chose to appoint personalities known to the public at large as Privacy Ambassadors for one year, chosen on criteria of moral standards and values, undertaking to promote the protection of privacy for a period of one year. As far as competitions aimed at producing the best story or scenario ("*My Facebook Story*") are concerned, the same authority asked famous writers to write the openings of stories about privacy, young people then being asked to write the rest. In Hungary, a TV video was made by a popular singer, famous among young people, warning against the dangers of unlimited use of Internet.

It is interesting to note that some DPAs' contests in the field of digital education may be officiated by **heads of government or Ministries of Education** as it was namely
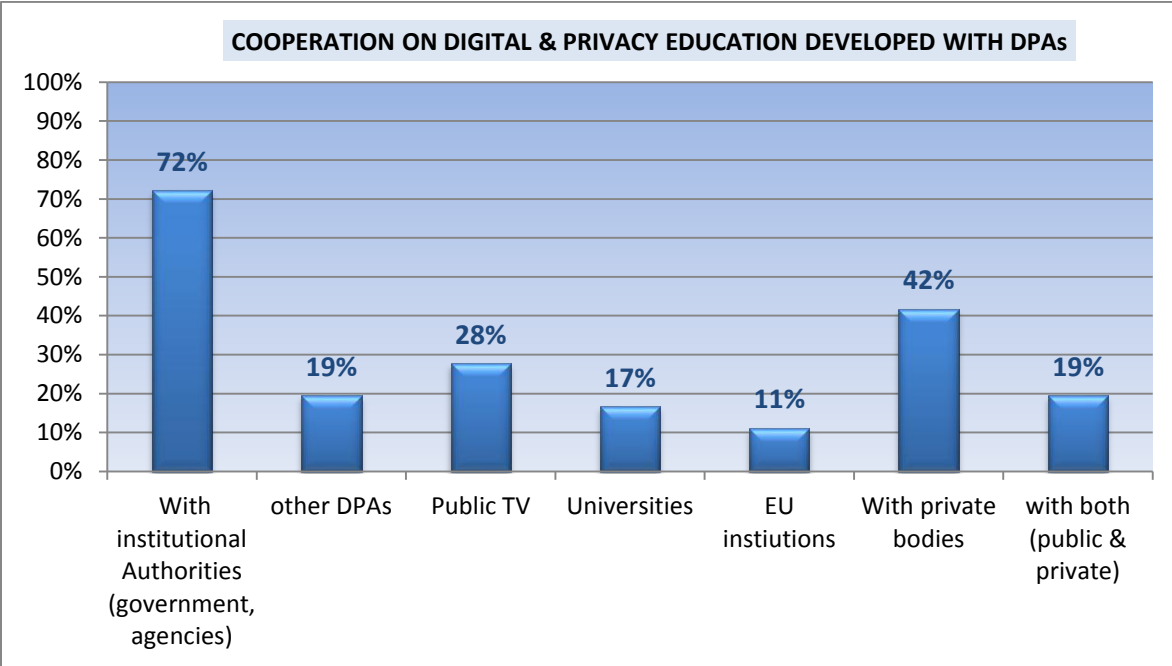
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the case in Hong Kong at the inauguration Ceremony of the Students Ambassadors of Privacy Programme and in Ireland when launching privacy online-competition targeted at young people.

Finally, it is to be noted that a few authorities have conducted targeted communication campaigns by means of SMS and mailing: the sending of targeted mailings to libraries (*the Belgian and Canadian authorities*), and the sending of SMS messages to a list of 100,000 addressees (population group targeted in advance), inviting them to protect their personal data and avoid sharing it with third parties (*the Moldavian authority*) are to be noted. The Greek authority indicates that it conducted a webinar with volunteer schools on the subject of data protection; this involved the establishment of an extranet network connecting (volunteer) schools, the administration and the DPA for initiatives on this topic.

3 authorities organised **debates** in the presence of teachers and NGOs in order for them to engage in discussion with young people, and with members of national Parliaments, within the framework of the showing of emblematic films such as "The Social Network" and "Minority Report" (*Belgium, Italy and France*).

4. Cooperation Developed by the Authorities

Most of the authorities that replied to the enquiry indicated that they have conducted many of their initiatives in cooperation with the public authorities (26 data protection authorities in particular). Cooperation has also been established between data protection authorities (in the case of 6 of the latter), as well as with private actors in a non-negligible proportion of cases (14 authorities).

COOPERATION ON DIGITAL & PRIVACY EDUCATION DEVELOPED WITH DPAs

- With institutional Authorities (government, agencies): 72%
- other DPAs: 19%
- Public TV: 28%
- Universities: 17%
- EU instiutions: 11%
- With private bodies: 42%
- with both (public & private): 19%

-   <u>Cooperation with Public Actors</u>

It is interesting to note the presence of National Ministries of Education, Youth, Digital Technologies and the independent authority charged with the defence and promotion of children's rights (Le *Défenseur des Droits des enfants*) in the capacity of institutional partners alongside the data protection authorities. Sectorial initiatives involving Justice and Interior Ministries, as well as IT Security agencies and NGOs are also to be found.

Cooperation with national governments covers, in particular, the putting in place of educational programmes linked to the protection of privacy on the Internet, the fight against cyber-bullying, and specific training for teachers, including the production of models and resources for the educational community concerning the data protection right.

Moreover, 6 authorities have engaged in cooperation with universities. In this regard, the competitions on the topic of privacy aimed at students, which have been repeated for the last 4 years by the Hong Kong authority, are to be noted; these mobilise the University community as a whole in the production of editorial documentaries, films broadcast on campus channels, interactive games and the provision of a "grand oral" on questions of privacy, as part of the appointment of the winner.

Furthermore, it should be noted that several authorities (as at least 4 of the latter informed us) have been successful in making use of programmes financed by the European Union in order to elaborate tools, micro-websites, studies and action programmes aimed at raising the awareness of young audiences with regard to digital technologies.

In this respect, it should be emphasised that several authorities mentioned the development of cooperation with the European Union "Safer Internet" programme, aimed at protecting children in the use of Internet and other communication technologies (long-term European project launched in 1999, which currently numbers more than 30 Member States). The "Safer Internet" Centres" constitute units established in each of the countries, whose duties also include the collection and reporting of illegal online content and the provision of answers to families' questions by means of telephone call centres. This programme continues to collaborate in the creation of tools, materials and other awareness-raising initiatives aimed at children, parents and the educational community in an effective manner, in partnership with the data protection authorities, as well as other public and private actors and associations. Today, **Safer Internet Day** (11th February) is a regular event celebrated throughout the world. It includes specific programmes, conferences and even a schools competition for the best children's website, that is to say educational initiatives which add to our initiatives in favour of Safer Internet.

-   <u>Cooperation with the Broadcasting Media</u>

The study also brings out the fact that a quarter of the authorities (10) have entered into agreements, for the most part with public, but also private TV channels and radio stations for awareness-raising campaigns aimed at the public at large.

- <u>Cooperation with the Private Sector</u>

As far as partnerships with private organisations are concerned, two types of cooperation may be distinguished.

On the one hand, 42% of respondents (i.e. 15 authorities) have developed partnerships with digital technology actors, including Microsoft, Facebook, Google and Mozilla. This cooperation was manifested, in particular, in the organisation of competitions on privacy, with Google contributing to the prizes of the winners of a competition for the best videos to the amount of €10,000 in the case of Ireland, and with Mozilla and Facebook contributing to the production of preventive resources and messages on the risks of loss of control on the Internet aimed at pupils and students, in the case of the province of Ontario. Moreover, Microsoft was involved in training initiatives in Mauritius and awareness-raising campaigns in Croatia.

On the other hand, partnerships associating data protection authorities (6) with private and public actors. In particular, these involve national and private Digital Technologies and Media training Centres: the "Privacy Education Centre" (*province of Ontario*), the "Medias and Broadcasting Education Centre" (*Finland*) and the "Partners for Education" Association (*Croatia*); organisations are also invited to participate in the joint creation of websites (*Estonia*), digital training projects "*MedienBilding*" (*the Rhineland-Palatinate region), education consultants (Great Britain)* and in debates with partners from filmmaking forums "*Cinépintcom*" and NGOs "Child Focus" (*Belgium*).

- <u>Cooperation between Data Protection Authorities</u>

It is interesting to note the synergies established between data protection authorities and their propensity to establish mutual partnerships, for joint operations; 19% of respondents (i.e. 7 authorities) indicated that they had pooled their resources in order to organise either study days, assessment exercises, conferences, advertising campaigns or other joint work. This statistic also takes into account the reuse noted by certain DPAs of awareness-raising campaigns with educational tools developed by their counterparts and reference works taken up and translated (case of the Norwegian "*You Decide*" campaign and of the Irish "*Sign up, Log In, Opt Out-Protecting your Privacy & Controlling your Data*" book, reproduced and translated by several authorities).

- <u>Other Cooperation:</u>

Finally, the initiative undertaken by the French authority may be emphasised, the latter having formed a collective of almost 60 actors from the world of education and research, child protection, parents' school associations and consumer associations, trade federations representing software publishers, large companies and SMEs, as well as public service TV channels. This partnership is based upon the extensive experience of each of the partners with regard to digital education, in order to reach a very wide range of audiences, thanks, in particular, to each organisation's networks

present on the territory as a whole. The purpose of this partnership consists of developing joint initiatives, such as educational packs aimed at young children, a reference content platform on digital technology and a national competition, as well as educational television series for the promotion of general digital technological culture and the provision of keys enabling the digital universe to be understood by all.

B.   QUANTITATIVE AND QUALITATIVE ASSESSMENT OF ACTIONS UNDERTAKEN IN DIGITAL EDUCATION (Question 2)

This question was intended to establish whether the data protection authorities had assessed their digital education practices.

Around three quarters of the authorities provided information in response, the nature of which is rather varied in quantitative and qualitative terms.

A third of the responses are principally composed of quantitative indicators. The authorities provided measurements of TV audiences (and number of appearances on channels), number of visits to dedicated websites, monthly and annual viewing and downloading statistics (comics, tutorials) and rates of participation in competitions (from one edition to the next, *Croatian and Hong Kong authorities*). These results are interesting initial indicators for measuring the development of consultations by visitors from one year to the next, and for quantifying the impact of isolated operations and the success of specific media (broadcasting, downloading).

With regard to the reports containing figures which were also passed on by a third of authorities, indicators were put forward with regard to the number of actions in school/extracurricular environments, the number of pupils and teachers present at the time of days and workshops and the number of documents distributed to date.
It would be interesting to make more detailed use of the figures of certain results passed on by the authorities, of which a statistically large number of audiences reached may be noted; I might mention for example, almost 3 million banners viewed on websites within the framework of a campaign conducted by the Bulgarian authority, a total of 100,000 views for the French authority's video "Share the Party" (on YouTube), as well as 100,000 downloads for the Canadian authority's comic, moreover distributed to 69,000 teachers, parents and public libraries, websites dedicated to young people receiving numbers of visits of more than 100,000 per month in the case of the French authority, and in the same order for the FTC platform focused on online practices; in terms of publics having received training or awareness raising, either within the framework of operations such as "The Super Party" which brought together 400,000 children at an exhibition mentioned by the authority of the province of Catalonia, and within the framework of workshops devoted to data protection and privacy: around 1,300 workshops are to be noted in the Rhineland-Palatinate region alone, training around 36,840 children and adolescents in almost 600 schools (primary, secondary, colleges and vocational training colleges) in a space of 4 years, this scheme being based on a growing number of trained external teachers, that is to say 29 to date; 411 training courses

organised by the Polish authority up to 2013, within the framework programme on data protection aimed at schools; more than 4,000 downloads of training tutorials on the right of protection of personal data aimed at primary and secondary education measured in 2013, since their launch by the authority for Great Britain.

In qualitative terms, on the other hand, it appears that use of satisfaction surveys measuring the quality of the online tools developed and the impact of training operations and campaigns undertaken by the authorities, still remains a little-used means of assessment (4 to 6 authorities). This approach is only very occasionally mentioned: thus the *FTC and the Canadian authority* respectively launched assessments, concerning their website and comic; the *Mauritian authority* had surveys conducted among the public concerning mini-films broadcast on TV channels. Satisfaction questionnaires launched following training courses are also mentioned (*the Bulgarian authority*) and feedback on the success of training operations (*authorities of the province of Québec and of the Rhineland-Palatinate region*). The distinctive assessment procedure of the authority for Great Britain is to be noted, which published a group of testimonies from pupils and students recorded on a dedicated website (designated Vimeo) giving their impressions after viewing educational resources on the right to protection of privacy.

Finally, the enquiries conducted by five authorities (*Mauritius, Great Britain, Ireland, Macedonia and Poland*) should be noted, aimed at measuring the level of interest and knowledge among the public on questions of data protection rights. The British authority indicated that it conducted these investigations in the form of a benchmark study with the teaching community, before making dedicated tutorials available.

C.   PUBLIC POLICIES CONCERNING DIGITAL EDUCATION (Question 3)

The final question concerned public policies with regard to digital education, target audiences and implementation schedules for these policies.

Overall, the authorities reported, in a rather convergent manner, the existence of digital strategic development plans comprising, either a digital education component, the creation of public digital spaces, provision of training for the public at large in schools in the use of Internet and the risks associated with new technologies, media training and the putting in place of codes of conduct with Internet access as well as active contact networks between citizens, young people and police departments in particular.

These initiatives are placed under the responsibility of a wide range of Ministries according to the country: Education, Health and Social Affairs, Industry, Digital Technology, Economy, Family, Childhood and Youth, Interior (Police), Justice, Consumption, and Regulation of Telecommunications etc.

Data protection does not as such appear to constitute a part of action priorities, with the exception of the Swiss plan aimed at German language cantons, which provides for the introduction of data protection teaching modules. Overall, public policies remain more focused on the protection of children online and the fight against cyber-bullying, as well as working in favour of digital training and the raising of awareness of secure use of new technologies in educational programmes.

However, 2 authorities mentioned open public consultations on the orientation of national strategies with regard to digital technologies. These authorities, the Canada and Hong Kong authorities respectively, indeed seized these opportunities to assert their observations and support the introduction of a sound privacy culture within the framework of digital citizenship and training modules in the protection of data and privacy in schools programmes.

III.   CONCLUSION / RECOMMENDATIONS

At the end of this report, which constitutes a first stage, it is possible to make several recommendations.

- Envisage making the whole of the educational resources mentioned by the authorities in their responses available on a platform website accessible to all;

- List, in particular, the educational resources and tools aimed at teaching on data protection and privacy;

- Thus determine the best practices and promote the creation of trainer training packs (to be produced in an adapted manner according to the target groups and the categories of trainers concerned: teachers, data protection Officers etc.);

- Continue the enquiry by means of targeted studies with the data protection authorities that appear to be at the leading edge of certain training initiatives (for example, role and feedback as regards the duties entrusted to "VIP" privacy ambassadors, the advantages of webinars in terms of the creation of networks and mode of distribution of training plans, the contributions of education and communication professionals alongside the authorities in the creation of teaching resources etc.);

- Go into greater depth, in particular, from the point of view of assessment (impact, cost/benefits), the effectiveness of different modes of action and organisation to be selected and, in particular, with regard to the initiatives that the working group wishes to launch: trainers' packs, best initiatives for national competitions devoted to digital education etc.;

- Generally speaking, give priority to analysis of the effectiveness of our practices with regard to digital education and, in particular, the initiatives conducted on the Internet by means of the available indicators (measurements of audiences etc.), as well as for authorities which have had data protection modules incorporated within school and exam programmes, envisage the assessment of these initiatives;

- This assessment point could be the subject of a debate at a specific workshop, at the time of the next International Conference in Mauritius: Are our awareness raising practices effective? How should they be assessed? What partnerships should be envisaged, which could be devoted to the digital education issue?

IV.   LIST OF APPENDICES

1.   APPENDIX 1:   LIST   OF   AUTHORITIES   HAVING CONTRIBUTED   TO   THE   QUESTIONNAIRE   (&   graphic representation)

2.   APPENDIX 2: QUESTIONNAIRE

3.   APPENDIX   3:   MEMBER   AUTHORITIES   OF   THE INTERNATIONAL WORKING GROUP ON DIGITAL EDUCATION (& graphic representation)

APPENDIX 1: QUESTIONNAIRE

Questionnaire on Digital Education to Data Protection Authorities of the International Conference of Data Protection and Privacy Commissioners

This questionnaire has been drafted to:
- Establish an inventory of national initiatives, resources and other available materials and documents at Data Protection authorities level, that aim at raising awareness and training the public on the use of digital technologies;
- Identify the needs for awareness tools and other training materials in digital literacy/ education

The CNIL coordinates this assessment and would welcome your answers to the questions below by Friday 28 February 2014 at the e-mail address pserrier@cnil.fr or cchatain-marcel@cnil.fr (Pascale RAULIN-SERRIER / Carina CHATAIN)

	Name of organization
1.	What actions and material (written documents, videos) have been developed individually or in association with other organisations (awareness raising campaigns, tutorials, PowerPoint slides/ speaking notes, inquiries, websites, guides of good practices or others, education packs, videos, games), what is the targeted audience (children, youth, students, schools, teachers, parents, …) ? - if any, could you mention in which language they are available - please add any useful web links

2.	Has a quantitative and/or a qualitative assessment of the actions undertaken in Digital Education been performed?

3.	Do Public Authorities (Ministries, Parliament…) in your country take a stand on the issue of digital education? If yes, please specify and describe the outline of the public initiative(s), target audiences and its implementation schedule

Thank you very much for your responses. They will help us in taking this important issue forward!

APPENDIX 2: LIST OF AUTHORITIES HAVING RESPONDED TO THE ENQUIRY

36 QUESTIONNAIRES RECEIVED:

- EUROPE: 25 responses
Albania, Germany – represented by the Rhineland-Palatinate state, Belgium, Bosnia-Herzegovina, Bulgaria, the province of Catalonia, Croatia, Spain, Estonia, France, Finland, Gibraltar, Greece, Hungary, Italy, Ireland, Latvia, Lithuania, Luxembourg, Macedonia, Moldavia, Poland, Romania, the United Kingdom and Switzerland.

- NORTH AMERICA: 4 responses
United States, Canada: federal authority and provincial authorities of Ontario and Québec

- AFRICA: 3 responses
Gabon, Senegal and Mauritius

- LATIN AMERICA: 2 responses
Columbia, Mexico

- ASIA-PACIFIC: 2 responses
Hong Kong, Macao,

APPENDIX 3: MEMBER AUTHORITIES OF THE INTERNATIONAL WORKING GROUP ON DIGITAL EDUCATION

28 AUTHORITIES:

19 Europe*: Albania, Rhineland-Palatinate state (Germany), Belgium, the province of Catalonia, Spain, Estonia, France, Finland, Gibraltar, Hungary, Italy, Ireland, Latvia, Lithuania, Luxembourg, Macedonia, Poland, Portugal, Romania, the United Kingdom
3 Africa: Burkina Faso, Gabon, Morocco
3 North America: United States, Canada, province of Ontario
2 Latin America: Columbia, Mexico
1 Asia-Pacific: Macao

9 AUTHORITIES: kept informed of the progress of work and of the principal results: Bosnia-Herzegovina, Croatia, Finland, (federal) Germany, Greece, Switzerland, Senegal, province of Québec and Hong Kong.

Digital Education Working Group Member DPAs

Region	Percentage
Asia-Pacific	4%
Latin America	7%
Africa	11%
North America	11%
Europe	67%