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Challenge Title: Data Management	
Use Case Author	Vittoria Russo, Maria Cristina Gaeta, Suor Orsola Benincasa University of Naples
Topic	Public Sector Legal
Overview	<p>“Lalaland City Council” in Italy, is preparing to digitize all the archives to create a section in transparent administration, accessible through access by ID, by all citizens.</p> <p>The digitization service will be outsourced and managed by an external company, whose employees will directly process the personal data of the citizens.</p> <p>The data will be merged into a single platform and will be managed by employees of “Lalaland City Council”.</p>
1. Engage	
Big idea	Focus on data management and subsequent availability.
Essential Question	If you were a DPO in the “Lalaland City Council”, what roles would you have assigned to the employees of the external company and then to the “Lalaland City Council” employees in the subsequent phases? What types of privacy policy would you give to citizens whose data are being processed? How would you have managed the next phase of access to the personal data?
Initial resources	<p>Project work digitization: The main objective of the project is the digitization of documents in the municipal population register: individual cards, family cards, ID cards and civil status registers. The documents will be filed and managed in digital format, linked to the Demographic Services management application, making them accessible and searchable on video with considerable savings both in terms of direct costs (paper, spaces) and indirect costs (time, efficiency).</p> <p>The project involves the creation of a database containing the data of the resident population for the subsequent data implementation in the software that will manage the services of the municipal population register.</p> <p>The project will be divided into six phases:</p> <ol style="list-style-type: none"> 1. Installation of software and driver scanners.

	<p>2. Verification of the quantity, of the state of conservation and subdivision by type of the documents to be digitized. At the end of this phase, a report will be drawn upon the status of the documents and on the choice of those to be digitized in order to be delivered to the customer.</p> <p>3. Digitization and implementation of the database with the insertion of all the data contained in the family cards, the individual ones and in the civil status registers.</p> <p>4. Preparation of documents for scanning, verification, and correction of errors and association of image files. At the end of the acquisition and verification of the documents will be made, together with the Office Manager and the Customer, the choice of indexing criteria, which will be identified by the type of deeds.</p> <p>5. Indexing according to the established criteria. Once the indexing phase is completed, while the service is being activated, the method for the extrapolation of the data from the municipal population register database for congruence checks is agreed. The extracted data are compared with those entered, proceeding to the manual correction of any anomalies.</p> <p>6. The last phase will be used to test the functionality of the final product with the use of the application at the branches, after disclosure of the results within the Public Entity and the subsequent publicity on the website of the City Council. The project to be implemented requires the availability of technical tools such as: PCs and scanners that will be made available by the City Council, together with the material to be digitized and the human resources that will have to collaborate actively.</p> <p>2.Verification of the quantity, of the state of conservation and subdivision by type of the documents to be digitized. At the end of this phase, a report will be drawn upon the status of the documents and on the choice of those to be digitized in order to be delivered to the customer.</p> <p>3. Digitization and implementation of the database with the insertion of all the data contained in the family cards, the individual ones and in the civil status registers.</p> <p>4. Preparation of documents for scanning, verification, and correction of errors and association of image files. At the end of the acquisition and verification of the documents will be made, together with the Office Manager and the Customer, the choice of indexing criteria, which will be identified by the type of deeds.</p> <p>5. Indexing according to the established criteria.</p>
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<p>Guiding Questions</p>	<p>Jointly, the students have to act like they are the DPO of the “Lalaland City Council” and DPO of the company that will manage the digitization. Before going deep on the subject, they have to analyse the facts and wonder what the City Council exactly wants to achieve with the planned data operation.</p> <p>Undertake a ‘situation room’ or ‘briefing room’ exercise with the students. They are your team. Encourage them to brainstorm to develop a list of questions.</p>
<p>Reflections</p>	<p>According to the list of questions: Individual reflections on the process.</p>

Other notes	<p>Suggestions for dealing with the brainstorming exercise:</p> <ol style="list-style-type: none"> 1. The teacher is the driver of the brainstorming exercise. 2. The teacher has to create an understanding atmosphere in which the students can express their ideas freely and confidently. <p>The teacher and students have to respect others ideas, because all ideas, although it can be initially seen as nonsense, have value to address the suggested problem.</p>
2. Investigate	
Activity Description	Encourage students to map out a process of the investigation they will follow for answering the questions above.
Resources	<ul style="list-style-type: none"> ▪ Reading resource ▪ General Data Protection Regulation (sections from 44 to 49). ▪ Communication from the Commission to the European Parliament and the Council, The exchange and protection of personal data in a globalized world, COM (2017) 7 final/2 of 15.2.2017. ▪ Commission Decision of 30 June 2003 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data in Argentina (Text with EEA relevance) (2003/490/EC) <p>Encourage students to collect and use resources to help them to address the question. Establish a method for collecting information and organize the lectures. Make sure you meet your own ethical and data protection requirements.</p>
Synthesis	<p>In this second stage the students should form teams of 3 or 4 people.</p> <p>By groups, they should use the bibliographic resources provided to solve the different questions or problematic ideas that arose during the brainstorming, with the help of the mind maps created for this purpose.</p> <p>Then, a representative from each group will orally present the solutions they have given to the different issues. Once the different opinions have been expressed, a discussion session will be opened, in which the students will have to take into account the details of the case.</p>

	<p>Finally, each group of students will submit a paper (on a maximum of 6 pages) answering those questions.</p> <p>Encourage students to summarise their answer.</p>
Reflections	<p>Encourage students to provide a reflection on the process:</p> <ul style="list-style-type: none"> ▪ How have you been organized in small groups: each one had a task assigned or have you been improvising? ▪ Do you think it is important to express your conclusions in public? ▪ Do you think your communication skills are essential to the DPO work? ▪ Do you think this way of approaching the problem will help you to become a DPO? ▪ Would you undertake your advising work in a different way than you have done? <p>(...)</p>
Other notes	
3. Act	
Solution Prototypes	<p>In order to carry out the DPO functions (sections 39.1 and 2 of the General Data Protection Regulation), students must individually prepare a report on the factual situation.</p> <p>The report should be structured as follows:</p> <ul style="list-style-type: none"> [1] Factual background [2] Legal bases [3] Conclusions <p>In addition, if it has been necessary to contact the Supervisory Authority, they must also point out those additional actions they have taken.</p> <p>At the end, one of these reports will be chosen and you will have to orally defend it before the commercial department of the company, indicating how they must legally act to be compliant with data protection rules and answering all their questions and doubts.</p>
Solution	<p>Students should have to provide a solution or options for different solutions in the format suggested above.</p>

Implementation plan	Students also should have to provide a plan for how at least one of the solutions should be delivered.
Evaluate	<p>Students should have to develop a journal entry to evaluate the different solutions, and how they might go differently about the exercise in future.</p> <ul style="list-style-type: none"> • What are the key challenges for the company in order to implement the plan you have identified? • Have you taken into account all the challenges involved in international data transfers? • If the company decides to change the strategy and transfer the data to the branch office in Peru, would they know how to find a quick solution? • Students might also be asked how the exercise itself could be further developed as a pedagogical process. • Would you undertake this task in a different way than you have done? <p>(...)</p>
Other notes	
4. Reflection and documentation	
Case notes	