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## OUR AIM

*The Information Commissioner continues in his efforts to engage with and assist data controllers in relation to their data protection obligations.*

*The workshops for Data Protection Officers ("DPOs") provide a platform that promotes discussion and facilitates collaboration between DPOs, in an attempt to broaden their understanding of data protection law and how this should be applied in practice.*

*The workshops also provide an opportunity for the Information Commissioner's office to gain an insight into the issues and challenges faced by data controllers and DPOs.*

## COVID-19

*Due to the ongoing Covid-19 pandemic, the Information Commissioner was unable to proceed with a workshop in its usual in-person form. Instead, the fourth workshop was held virtually.*

## CONTACT

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# DPO WORKSHOP (R4)

Date: 20<sup>th</sup> April 2021  
Venue: Virtual Workshop

## AGENDA

09:10 – 09:15	Opening remarks
09:20 – 11:00	Part 1 - Data Protection Impact Assessments
11:00 – 11:15	<i>Mid-morning break</i>
11:15 – 12:30	Part 2 - DPO Tasks: Resources & Availability
12:30 – 13:30	<i>Lunch-time break</i>
13:30 – 14:40	Part 3 - The Rights of Individuals
14:45 – 15:00	<i>Mid-afternoon break</i>
15:00 – 16:30	Part 4 - Accountability

## SUMMARY

For each part of the workshop, a presentation was delivered using guidance issued by the Information Commissioner's office, the relevant provisions in law, and information about data protection incidents investigated by the Information Commissioner's office to date, where applicable. Some of the guidance notes referred to during the workshop, all of which are available on the Gibraltar Regulatory Authority's website, were as follows –

- [Guidance Note on Data Protection Impact Assessments](#)
- [Guidance Note on Data Protection Officers](#)
- [Guidance Note on The Rights of Individuals](#)

Each session included a variety of virtual exercises and/or case studies to encourage group discussion and allow for practical consideration of data protection issues, their resolution, and best practice.

The following are some examples of matters discussed:

- **Part 1 – Data Protection Impact Assessments ("DPIAs")**
  - An informative session focusing on the basic requirements under the Gibraltar General Data Protection Regulation ("Gibraltar GDPR") and Data Protection Act 2004 ("DPA") in relation to DPIAs.
  - The presentation discussed risks under the Gibraltar GDPR and DPA, advised when DPIA's are required, who should carry out the DPIA, and the information that should be contained therein.
  - A step-by-step DPIA example was provided. This followed a fictional scenario, affording participants a comprehensible insight into how a DPIA should be conducted to help identify the privacy risks of a proposed processing operation and help establish mitigation measures to reduce high risks.
- **Part 2 – Data Protection Officer Tasks: Resources & Availability**
  - This session involved a presentation providing an insight into the tasks of Data Protection Officers ("DPO") as required by the Gibraltar GDPR and DPA.

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- The session also discussed matters relating to the resources provided to a DPO to undertake such tasks, as well as the need to avoid conflicts of interest if the DPO is undertaking further roles.
- Interactive problem questions were provided throughout the presentation, relating to several problem areas identified.
- **Part 3 – The Rights of Individuals**
  - A brief overview of the definition of personal data was provided, followed by guidance on the rights of individuals under the Gibraltar GDPR and DPA.
  - Practical examples were presented throughout, prompting healthy group discussion, affording participants the opportunity to raise further questions on the topic.
  - Two interactive audio-visual activities followed, focusing in particular on the right of access and right to erasure. In addition, participants were invited to view the collection of short videos published by the Information Commissioner on the GRA's [YouTube channel](#).
  - To conclude, an insight into the regulatory perspective was provided. It was reiterated that the main aim of the Information Commissioner's Office is to improve the information rights practices of organisations where there is an opportunity to do so.
- **Part 4 – Accountability**
  - The presentation emphasised the concept of accountability, highlighting its importance in ensuring an organisation's ongoing compliance with data protection law.
  - The informative delivery described how the accountability principle applies in practice and clarified what the Information Commissioner's office looks for and expects from data controllers in terms of demonstrating compliance in this regard.
  - Practical guidance and examples were again provided throughout the session. The closing group activity prompted debate and afforded participants an opportunity to share with the Information Commissioner's office, their organisation's stance on accountability.

## SUBSCRIPTION

Our quarterly e-newsletters aim to provide subscribers with news, updates, developments and additions to our website in relation to data protection matters, as well as our work as the statutory body responsible for the enforcement of data protection laws.

To subscribe, please email: [dpsubscribe@gra.gi](mailto:dpsubscribe@gra.gi)

## DPO WORKSHOPS

Email [dpoworkshops@gra.gi](mailto:dpoworkshops@gra.gi) if you are a DPO and would like to attend future workshops for DPOs.

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## ATTENDEES

Participation in DPO workshops will likely contribute to a DPO's knowledge of data protection law, which is of importance as per Article 37(5) of the Gibraltar GDPR and/or section 79 of the Data Protection Act 2004.

<b>Name</b>	<b>Organisation</b>
Sharon Crippin	Betfred Blacktower Financial Management (Int.) Limited
Gema Ruiz	Charles Gomez & Company Collingwood Insurance Co. Ltd Deloitte Ltd
Ainhoa Gonzalez	Entain Group Entain Group
Anna Bailey	Gibdock Limited Gibraltar Defence Police Gibraltar International Bank
Jose Luis Martinez	Gibraltar Productions Gibraltar Treasury Department Gibraltar Treasury Department Greentube Internet Entertainment Solutions GmbH Greentube Internet Entertainment Solutions GmbH Herold Mediatel Ltd
Michelle Tavares	Herold Mediatel Ltd
Otman Messoudi	IDT Financial Services Limited IFAI Limited
Michael Adamberry	Isolas LLP Kindred Group
Albert Yome	Legal Services Regulatory Authority
Charles Fava	Logistable Ltd
Christina Jimenez	Logistable Ltd Lottoland Group Phillips Baristers & Solicitors
Viktorija Barnes	Providential Trust Ltd
Jimmy Imossi	Sapphire Networks
Esther Sanchez Del Pozo Fernandez	Steadfast Corporate Services
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