



## RECOGNITION PROCESS OF THE TRAINING PROGRAMS

---

### **Security level**

Public

---

### **Important announcement**

This document is the property of ANF Certification Authority

Its reproduction and dissemination is prohibited without the express authorization of ANF Certification Authority

**Copyright © ANF Certification Authority 2018 - 2020**

---

**Direction:** Gran Via de les Corts Catalanes 996. 08018 Barcelona (Spain)  
**Telephone:** 902 902 172 (Calls from Spain) (+34) 933 935 946 (International)

**Fax:** (+34) 933 031 611  
**Web:** [www.anf.es](http://www.anf.es)

*This document is the property of ANF Certification Authority.  
Its reproduction and dissemination without the express authorization of ANF AC is prohibited.*

OID 1.3.6.1.4.1.18332.105.79  
V 1.2. 2020/01/20

## Document control

Version	Creation date	Author
1.0	2018/11/23	M. Carmen Mateo

## Upgrades

Version	Proposed by	Approved by	Date Modification	Date Approval	Author
1.1	Legal Department	M. Carmen Mateo	2020/01/20	2020/01/20	MC. Matthew

V 1.1: Adaptation to version 1.4 of the AEPD-DPD Scheme of December 23, 2019.

# 1. INTRODUCTION

The Certifying Entity ANF AC will carry out the recognition of the training programs of the Training Entities that request it, following the criteria established in the Certification Scheme of Data Protection Delegates (AEPD-DPD scheme), in the Regulation of the Certification Entity (EC) and what is established in this document.

The Training Centers that request recognition of their training program, must have accredited training experience, their name and history in the training field must be adequate to the knowledge imparted in the syllabus of the Scheme.

It is the responsibility of the Certification Entity to ensure the prestige of the Scheme, ANF AC reserves the right not to admit a request for recognition, said refusal will be motivated and communicated to the applicant.

ANF AC reserves the right not to accept a new request from a Training Entity to which it has withdrawn recognition, as well as requests that come from EF that, due to their trajectory, may discredit the scheme. The refusal will be motivated and communicated to the applicant.

## 2. REQUIREMENTS

### Initial recognition

The CB, in accordance with the provisions of Annex I, section II of the Scheme, must verify and, where appropriate, acknowledge the content of the program, duration, didactic methodology, validation method, requirements related to the training staff, the means and facilities, use, etc.

In accordance with what is published in the Scheme, the training of the Training Entity must be adjusted to:

1. The duration of the training program will be 60, 100 or 180 hours. They may be made up of several courses or modules.
2. The distribution for each training program must correspond to the percentages of training hours that the AEPD-DPD scheme establishes for each domain, that is:
  - For the 60 hour training:
    - Domain 1 - 30 hours
    - Domain 2 - 18 hours
    - Domain 3 - 12 hours
  - For the 100 hour training:
    - Domain 1 - 50 hours
    - Domain 2 - 30 hours
    - Domain 3 - 20 hours
  - For the 180-hour training, the distribution will be as follows:
    - Domain 1 - 90 hours
    - Domain 2 - 54 hours
    - Domain 3 - 36 hours
3. ECTS and LRU credits will be computed for 25 hours and 10 hours respectively in accordance with the provisions of the AEPD-DPD Scheme.
4. The didactic methodology must include imparting theoretical knowledge, carrying out practical exercises and developing collaborative exercises with a result and expository value (group work that includes exhibitions and debates, either face-to-face and / or tele-face-to-face).
5. The knowledge validation method will be by passing an exam. Mere attendance or participation in training is not enough.
6. The training may be given in person, blended or completely online.
7. The people who provide the training must be independent professionals of the scheme with knowledge and professional experience equivalent to or greater than that required of the candidate to be certified and with the ability to assess the training of the students. The Training Entity must provide the CV of the teaching staff.

The teaching staff will not be able to reconcile the training with the elaboration of questions, nor with the function of evaluator in the certification bodies.

The Training Entity must certify compliance with the aforementioned points, providing all its support to the CB so that it can carry out the review tasks imposed by the Scheme, both in the recognition phase, and at any other time when the CB consider it necessary to perform a health check.

Upon receipt of the application and necessary documentation by the Training Center, the CB will verify if it is complete and, if it is not, it will grant a period of 30 business days to the Entity of Training in order to correct defects or deficiencies.

After this period has elapsed, without the Training Entity having adequately addressed the request, the request will be rejected or, for duly justified reasons, a new period of 15 business days will be granted.

After the timely assessment by the competent person in charge of the Certification Entity, if the documentation presented conforms to the requirements of the AEPD-DPD Scheme (Annex II), a report will be submitted to the Governing Board of ANF AC, as the competent body to decide on the recognition of the training program.

Once the recognition has been approved by the Governing Board of ANF AC, the Certificate of recognition of training will be issued to the EF.

The conditions established in the AEPD-DPD scheme that are in force must be met.

The recognized programs will be published on the website [www.anf.es](http://www.anf.es) indicating:

- Name of the Training Entity with identification of its web page (the web address must point directly to the area of the web page where the training is offered).
- name of the recognized program,
- date of recognition,
- duration (60, 100 or 180 hours) and criteria for passing it,
- subject taught and distribution of hours for each of the three domains of the syllabus,
- program format (online or face-to-face) and,
- where appropriate, date and reasons for the loss of validity of the recognition. This same information will be transferred to the AEPD for publication.

RUs must publish clear and transparent information on recognized training programs on their website, including the following information:

- Full name of the Training Entity
- Name of the CB that has recognized the programs
- Name of the recognized program
- Date of completion of the program
- Duration and criteria for passing the program
- Subject taught and distribution of hours for each of the three domains of the syllabus
- Program format (online or face-to-face)
- List of teachers who teach each of the epigraphs by domain
- Updated curriculum of teachers

#### **Surveillance**

ANF AC, for the fulfillment of the surveillance and supervision functions entrusted to it by the AEPD-DPD Scheme, will review, when the situation requires it at least once a year, the maintenance of the recognition conditions. It may also request at any time, in order to verify that the contents and other requirements mentioned above comply with the provisions of the Scheme. For this, you can request that the Training Entity provide you with:

- a) access credentials to your online training platform or,
- b) access to the facilities where the course takes place in case of face-to-face training.
- c) If necessary, interviews with the trainers and administration staff who assess the suitability of the students to the training itineraries.

ANF AC, through any means (physical presence in the classroom, access to the platform, verification of practical cases, group work, documentation, knowledge acquisition tests, etc.), will inspect that the training processes:

- a) They are developed according to the recognized activity,
- b) That they be publicized with transparency and
- c) That in no case should there be an inappropriate use of the brand and logos of the entities that participate in the scheme.

ANF AC will supervise the website of the Training Entity in which the recognized program is published, demanding that it comply with the requirements of the AEPD-DPD scheme.

Likewise, it will endeavor, as far as possible, to control the advertising of this training offered by other means, for this purpose it may request information from the Training Entity about the promotional campaigns it carries out.

He will especially watch over the independence and impartiality, real and perceived, between the activities of the Certifying Entity and the Training Entity.

The EC will carry out control activities of the recognized training programs aimed at achieving an authentic qualification of the candidates and preventing them from focusing on a simple training to pass the exam rather than on their training.

The CB will inform the RUs that both ENAC and the technical staff of the AEPD may attend the courses they teach in an unannounced manner in order to evaluate the effectiveness of the control systems established by the CBs.

Likewise, the CB will inform the RUs that, in accordance with the provisions of the scheme, the AEPD reserves the right to request at any time the RUs to deliver their training programs for verification and, if not be in accordance with the Scheme, they may revoke them for reasons. Likewise, they will be able to take the pertinent tests to verify the rigor of the training given and the tests carried out on their students to pass the training.

The result of the annual supervision will be recorded in a report prepared by the competent person in charge of the CB. This report will contain the assessment and evidence of all the aspects required for recognition, as well as aspects related to transparency, independence and impartiality. In order for the RU to improve and assess the training given, the CB may send them statistical information on the number of passed in each call, with distribution of the results by domains or headings.

This information is confidential; CBs can only provide it to RUs whose programs they have recognized and must ensure that RUs do not exchange this type of information. RUs cannot publish this information on their website or use it for commercial purposes.

In case of non-compliance, according to severity of the incident:

- may withdraw the acknowledgment issued, or
- require correction within a specified period of time, failure to rectify or reiterate the incident will lead to the withdrawal of recognition.

In any case, ANF AC may withdraw the recognition of the training program for breach of the commitments acquired with ANF AC, when the prestige of the Scheme is breached or damaged.

Failure to comply with the requirements established for the recognition of RU training programs and their control by CIs may be grounds for termination of the trademark use contract.

ANF AC is subject to the criteria established by the AEPD and ENAC regarding the maintenance of the validity of the recognition of the programs granted due to legal or technological changes. In any case shall

### 3. SUSPENSION OF RECOGNITION

In the event that non-compliance is detected or its requirements are not met by the Training Entity, ANF AC may temporarily suspend an examination for a maximum period of 3 months until the Training Entity provides the necessary evidence to lift the suspension.

The suspension of recognition will be published on the website of ANF AC, [www.anf.es](http://www.anf.es)

### 4. SUSPENSION OF RECOGNITION

The recognition may be withdrawn for not having remedied the causes that led to the suspension within the period of time granted for this purpose or the evidence shown by the Training Entity being insufficient, at the discretion of the Certifying Entity to accredit the required correction.

At its discretion, ANF AC may directly withdraw the recognition when the breach is very serious, when it is repeated, due to lack of collaboration of the Training Entity in the investigation processes or for discrediting the scheme.

Loss of recognition will be published on the ANF AC website, [www.anf.es](http://www.anf.es)

ANF AC reserves the right not to accept a new request from a Training Entity to which it has withdrawn the recognition, the refusal will be motivated and communicated to the applicant.

### 5. RIGHTS OF APPLICANT FORMATION ENTITIES

It is the responsibility of the Certification Entity to ensure the prestige of the Scheme, ANF AC reserves the right not to admit a request for recognition, said refusal will be motivated and communicated to the applicant.

The Training Entities whose application has been admitted, inadmissible and obtain the recognition of their training programs in accordance with the AEPD-DPD scheme, will enjoy the following rights:

- a) To claim and appeal any unfavorable decision.
- b) To be informed of the procedure for recognition.
- c) To be treated with respect and fairness.
- d) To be informed of the moment of approval of the recognition by the Certifying Entity ANF AC, in order to be able to offer, from that moment, their training as recognized, in accordance with the AEPD-DPD scheme.
- e) To have the 60, 100 and / or 180 hour programs that meet the requirements of the AEDP-DPD scheme be recognized, with the limitations indicated above for cases of loss of prior recognition.
- f) That a certificate of recognition is issued with the content and in the terms of the AEPD-DPD scheme.
- g) That the recognition carried out by ANF AC have validity in the recognition processes of other certification entities.
- h) To the publication of the recognized programs on the ANF AC website with the content and in the terms of the AEPD-DPD scheme.



## 6. OBLIGATIONS OF RECOGNIZED TRAINING ENTITIES

The Training Entities that request and obtain the recognition of their training programs in accordance with the AEPD-DPD scheme, will have the following obligations:

- a) Use a name in accordance with the training program taught, which does not lead to confusion about the training of PE, or discredit the scheme.
- b) That the website on which the recognized training program is published maintains a professional appearance.
- c) Not to publish information that is solely the responsibility of the CB, such as exams, fees, or any other that may undermine the perception of impartiality and independence that should exist between the Training Entities and the Certifying Entity.
- d) Offer the programs informing of the provisional nature of the recognition, until ANF AC obtains the ENAC accreditation.
- e) Not to publish neither on the EF website, nor in its brochures, advertising material, facilities, etc., the logo or trademarks of the AEPD, ENAC, nor that of the ANF AC Certification Entity, while the recognition of your program is provisional. When it becomes definitive, you can make use of the trademarks in the manner provided in the AEPD-DPD scheme.
- f) That the teaching staff associated with the EF not use the logos of AEPD, ENAC, or ANF AC in their CV, social networks or professional platforms, or make any review that may appear to have some type of recognition from the AEPD, ENAC or the EC, except that they have obtained the certification as Delegate of Data Protection, after passing the corresponding certification exam and subsequent requirements, according to the AEPD-DPD scheme.
- g) That the professors who access the virtual campus offered by ANF as support for the preparation of their classes, do not appear that this training has a greater scope than the improvement of their knowledge. In no case is it a certificate that qualifies you as a teacher, or as a DPD.
- h) That the EF does not link the recognition of the training program by ANF AC, to the need for its students to take the certification exam with ANF AC.
- i) Respect the DPD Certification Scheme and all applicable procedures.
- j) Act in their professional field with due technical competence, ensuring the maintenance of the prestige of the recognition granted.
- k) Collaborate with the certification body in the activities of supervision of its performance.
- l) Inform the certification body about any professional situation that could affect the scope of the recognition granted.
- m) Do not use the recognition of the program for different uses other than those derived from carrying out activities within the scope of its participation as an agent of the scheme.
- n) Not to carry out harmful actions, of any nature, or damage the image of AEPD, ENAC, students and / or ANF AC.
- o) Communicate immediately any change in the recognized courses in order to maintain this recognition.
- p) Collaborate in the face of new demands arising from possible future versions of the scheme AEPD-DPD.

# ANNEX I

## Documents to be presented by the EF in an application for recognition.

1. Training program recognition contract.
2. Contract for the use of the mark of the scheme (Annex II B of the scheme)
3. Responsible declaration of compliance with the code of ethics (Annex III of the scheme)
4. Responsible declaration of compliance with the independence and impartiality requirements contained in the AEPD-DPD v 1.4 scheme.
5. Documentation accrediting all the information that is consigned in the application with relevance for the purposes of complying with the prerequisites defined in the AEPDDPD certification scheme (point 6.3) to recognize the training programs.
6. Documentation accrediting that the programs presented comply with the content, the hours of dedication of each domain, that the didactic methodology consists of imparting theoretical knowledge, practical exercises and group activities and that the validation method consists of passing the a test. In the event that its content does not correspond exactly to the headings and sub-headings of the program established in the AEPD-DPD scheme, it will be  
You will need to send a table of equivalences.
7. CV of the teacher or teachers who will teach the course.

## ANNEX II

### Criteria for recognition of training programs.

The aspects that are verified in this material correspond to the requirements set forth in the Scheme AEPD-DPD v1.3-

<b>Program name:</b>
<b>Web address:</b>
<b>Format:</b>
<b>Duration of training:</b>

Subject taught in accordance with the program defined in the Scheme.	Evidence		
	Yes	Not	I know requires
Weighted Domain List.			
Content of the training syllabus according to the AEPD Scheme-DPD.			
Distribution of the hours of the training programs according to the Training Route			

Validation method by passing an exam:	Evidence		
	Yes	Not	I know requires
Exam models, question banks and / or technical availability for technical evaluations in their virtual platforms (if they have them) that allow their verification.			

Didactic methodology that includes:	Evidence		
	Yes	Not	I know requires
It has didactic material that allows <b>imparting theoretical knowledge</b>			
It has didactic material that allows <b>carrying out practical exercises.</b>			
It has didactic material that allows <b>realization of practical exercises and development of group exercises.</b>			

Training staff:	Evidence		
	Yes	Not	I know requires
Has CV of the training staff			
The training staff has knowledge and professional experience equivalent to or greater than that required of the candidate to be certified and with the ability to assess the training of the students.			

Training Certificate:	Evidence		
	Yes	Not	I know requires
<p>It has a certificate model that includes:</p> <ul style="list-style-type: none"> <li>- Name of the Training Entity.</li> <li>- Name of the recognized program.</li> <li>- Date of completion of the same.</li> <li>- Duration and criteria for overcoming it.</li> <li>- Subject taught and distribution of hours for each of the three domains of the syllabus.</li> <li>- Program format (online or face-to-face)</li> </ul>			