DATA PRIVACY TRAINING PROGRAM

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EXECUTIVE SUMMARY

The office's data privacy training program ensures government employees understand how to responsibly manage and protect personal data. Utah law requires all employees who access personal data, or supervise those who do, to complete a mandatory training within 30 days of hire and annually thereafter.

The program also offers optional advanced resources, including workshops, micro-trainings, infographics, templates, and one-on-one consultations, to support employees with more specialized privacy responsibilities.

All materials are available through privacy.utah.gov, making them easily accessible to entities of all sizes and resource levels. This structure ensures consistent baseline knowledge while providing targeted support where needed, strengthening privacy practices across all jurisdictions.

PART 1:

WHAT THE PROGRAM ACCOMPLISHED THIS YEAR

HIGH LEVEL METRICS

- Privacy.utah.gov launched less than a year ago with 29 pages. Since then, we've expanded the site to 43 pages and generated more than 44,000 views from over 7,900 active users.

- A total of 8,641 files were downloaded from privacy.utah.gov in 2025.

- The privacy awareness training was uploaded to YouTube to improve access for entities that lack resources. That training has 17,000+ views.

- We delivered eight unique virtual workshops this year, with an average of 15 governmental entities participating in each session. With monthly offerings, we estimate that more than 600+ entities across all jurisdictions have attended our workshops over the course of the year.

- We presented at 42 events.

- We've created 10 infographics, 16 micro-trainings, 11 templates, and 6 static slide decks from our workshop series.

KEY IMPROVEMENTS

Along with the workshop series, some of the more important content that we've produced include:

- A revamped privacy framework 2.0 with a 2.1 version coming soon.

- Templates for general privacy policy, website privacy notice, personal collection notice, request to amend or correct a record, at-risk employee form, request for a privacy notice, privacy program report, privacy impact assessment, data sharing agreement, and data privacy terms and conditions.

PART 2:
WHAT WORKED / LESSONS LEARNED

- Maintained strong engagement from state agencies in our monthly Privacy Council, with an average of around 40 privacy professionals attending each meeting.

- Held monthly meetings with the Privacy Education Subcommittee, fostering meaningful and productive discussions.

- Expanded workshop participation beyond state agencies: while early-year attendance was primarily state-focused, local government engagement has grown steadily since late summer, and now local entities make up the majority of participants.

- Annual Training Surveys: The most recent survey reached 119 recipients and received 54 responses, providing a solid feedback sample to guide program improvements.

PART 3:
FOCUS AREAS FOR NEXT YEAR

- Launching new privacy councils focused on local government and higher education.

- Developing a statewide privacy directory to help connect individuals serving in similar roles.

- Expanding our virtual workshop series by adding two new monthly sessions: a Records Management workshop (in partnership with the Division of Archives and Records Services) and a dedicated Incident Response workshop.

- Collaborating with a graphic design intern to enhance document design and implement standardized formatting.

- Creating 2–3 new training videos tailored to specific roles and key privacy practices.

- Expanding training and awareness campaigns to broaden reach and engagement.
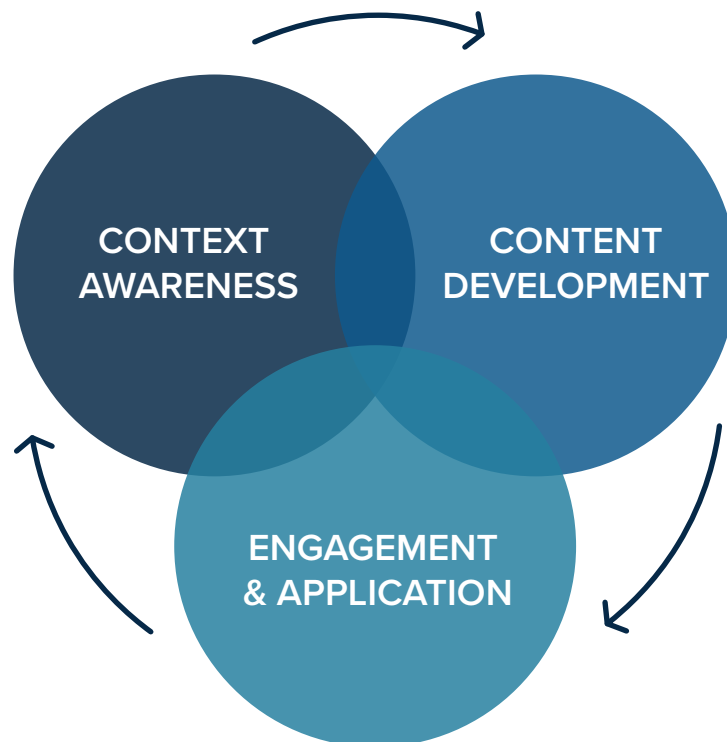
LEARNING CONTINUUM

The learning continuum illustrates the typical phases employees progress through as they develop knowledge and skills in managing personal data. It helps privacy professionals scaffold learning and align training to the needs of staff across all jurisdictions. Our continuum is represented as a three-part Venn diagram:

- **Context Awareness** – Why we do what we do. Focuses on the purpose, principles, and legal requirements that guide privacy practices.

- **Content Development** – How we do it. Concentrates on building practical skills, knowledge, and processes for effective data governance.

- **Engagement and Application** – What's next. Emphasizes applying learning in real-world scenarios, planning for future challenges, and fostering sustainable privacy practices.

This continuum provides a structured, scalable framework that ensures all employees gain a foundational understanding while supporting ongoing growth and consistent privacy practices across state government.

PRIVACY FRAMEWORK

The Utah Office of Data Privacy Training Program is tied to the privacy practices outlined in our Framework. A detailed explanation can be found here.

CATEGORY	IDENTIFIER	PRIVACY PRACTICE NAME
GOVERN	1.1	Chief Administrative Officer (CAO) Designation
	1.2	Records Officer Appointment
	1.3	Records Officer Training and Certification
	1.4	Statewide Privacy Training
	1.5	Privacy Program Report
IDENTIFY	2.1	Record Series Creation and Maintenance
	2.2	Record and Record Series Designation and Classification
	2.3	Inventorying
	2.4	Statement Filed with State Archivist
	2.5	Retention Schedule Proposal and Approval
	2.6	Record Series Privacy Annotation
	2.7	Privacy Impact Assessments (PIA)
	2.8	Record and Personal Data Sharing, Selling, and Purchasing
CONTROL	3.1	Data Subject Requests for Access
	3.2	Data Subject Requests for Amendment or Correction
	3.3	Data Subject Requests for an Explanation
	3.4	Data Subject Requests by At-Risk Employees for Restricting Access
COMMUNICATE	4.1	Privacy Notice (Notice to Provider of Information)
	4.2	Website Privacy Notice and Website Privacy Policy
PROTECT	5.1	Minimum Data Necessary
	5.2	Retention and Disposition of Records Containing Personal Data
	5.3	Incident Response and Notification to the Cyber Center and Attorney General
	5.4	Breach Notification to Affected Individuals

CONTENT TRACKER

The content tracker displays the following information:

    1. Program Component - The artifact or event

    2. Status - Completed, In progress, Backlog, Hold

    3. Privacy Practice - Which practice does the artifact/event tie into. N/A if not applicable.

    4. Learning Continuum - Which phase of the venn diagram does the artifact/event tie into?
Context (why), Content (How), Engagement (What's next)

🎤 FIELD WORK

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
Training Council	In progress	N/A	3- Engagement
Booth Exhibit	Completed	N/A	1- Context
Speaking Events	Completed	N/A	1- Context

📊 INFOGRAPHICS

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
Guidance on Website Tracking	Completed	COM 2	2- Content
50 State Law Tracker	Completed	N/A	2- Content
HB 444 Summary	Completed	N/A	2- Content
GDPA Summary	Completed	N/A	2- Content
GRAMA Summary	Completed	N/A	2- Content
DARS Statute Summary	Completed	N/A	2- Content
CAO Summary	Completed	Gov 1	2- Content
ARO Summary	Completed	Gov 2	2- Content
Inventory Guide	Completed	IDE 5	2- Content
Role Comparison	Completed	N/A	2- Content

Handbook	Backlog ▼	N/A ▼	2- Content ▼
Awareness Webpage	Backlog ▼	N/A ▼	1- Context ▼
ODP Newsletter	Backlog ▼	N/A ▼	1- Context ▼
Partner Newsletters	In progress ▼	N/A ▼	1- Context ▼
Gemini Storybook	Backlog ▼	N/A ▼	1- Context ▼
Gemini VEO	Backlog ▼	N/A ▼	2- Content ▼
PIA - Video	Hold ▼	IDE 7 ▼	2- Content ▼

☑️ MANDATORY TRAINING

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
General Privacy Awareness Training	Completed ▼	Gov 4 ▼	1- Context ▼
2026 Training Plan	In progress ▼	N/A ▼	1- Context ▼

⏱️ MICRO-TRAINING

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
Gov 1 Micro-Training	Completed ▼	Gov 1 ▼	2- Content ▼
Gov 2 Micro-Training	Completed ▼	Gov 2 ▼	2- Content ▼
Gov 3 Micro-Training	Completed ▼	Gov 3 ▼	2- Content ▼
Gov 4 Micro-Training	Completed ▼	Gov 4 ▼	2- Content ▼
Gov 5 Micro-Training	Completed ▼	Gov 5 ▼	2- Content ▼
IDE 1 Micro-Training	Completed ▼	IDE 1 ▼	2- Content ▼
IDE 2 Micro-Training	Completed ▼	IDE 2 ▼	2- Content ▼
IDE 3 Micro-Training	Completed ▼	IDE 3 ▼	2- Content ▼
IDE 4 Micro-Training	Completed ▼	IDE 4 ▼	2- Content ▼
IDE 5 Micro-Training	Completed ▼	IDE 5 ▼	2- Content ▼
IDE 6 Micro-Training	Completed ▼	IDE 6 ▼	2- Content ▼
IDE 7 Micro-Training	Hold ▼	IDE 7 ▼	2- Content ▼

Program Component	Status	Privacy Practice	Continuum
Con 2 Micro-Training	Backlog ▼	CON 2 ▼	2- Content ▼
Con 3 Micro-Training	Backlog ▼	CON 3 ▼	2- Content ▼
Con 4 Micro-Training	Backlog ▼	CON 4 ▼	2- Content ▼
Com 1 Micro-Training	Completed ▼	COM 1 ▼	2- Content ▼
Com 2 Micro-Training	Completed ▼	COM 2 ▼	2- Content ▼
Pro 1 Micro-Training	Completed ▼	PRO 1 ▼	2- Content ▼
Pro 2 Micro-Training	Backlog ▼	PRO 2 ▼	2- Content ▼
Pro 3 Micro-Training	Backlog ▼	PRO 3 ▼	2- Content ▼
Pro 4 Micro-Training	Backlog ▼	PRO 4 ▼	2- Content ▼
Con 1 Micro-Training	Completed ▼	CON 1 ▼	2- Content ▼
Data Governance Summit	Hold ▼	N/A ▼	3- Engagement ▼
Mailing List	Completed ▼	N/A ▼	3- Engagement ▼
CIPM Training	Hold ▼	N/A ▼	3- Engagement ▼
Ide 8 Micro-Training	Completed ▼	IDE 8 ▼	2- Content ▼
Privacy Directory	Hold ▼	N/A ▼	3- Engagement ▼

TEMPLATES

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
Framework 1.0	Completed ▼	N/A ▼	2- Content ▼
Privacy Policy	Completed ▼	N/A ▼	2- Content ▼
Website Privacy Notice	Completed ▼	COM 2 ▼	2- Content ▼
Request to Amend or Correct a Record	Completed ▼	CON 2 ▼	2- Content ▼
Privacy Notice - Collection	Completed ▼	COM 1 ▼	2- Content ▼
PIA	Completed ▼	IDE 6 ▼	2- Content ▼
Privacy Program Report	Completed ▼	Gov 5 ▼	2- Content ▼
Request for a Privacy Notice	Completed ▼	CON 3 ▼	2- Content ▼
Framework 2.0	Completed ▼	N/A ▼	2- Content ▼
At-Risk Employee Form	Completed ▼	CON 4 ▼	2- Content ▼

Con 2 Maturity Model	Backlog ▼	CON 2 ▼	2- Content ▼
Pro 4 Maturity Model	Backlog ▼	PRO 4 ▼	2- Content ▼
Pro 2 Maturity Model	Backlog ▼	PRO 2 ▼	2- Content ▼
Data Sharing Agreement	Completed ▼	IDE 8 ▼	2- Content ▼
Data Privacy Terms & Conditions	Completed ▼	IDE 8 ▼	2- Content ▼
Gov 1 Maturity Model	Backlog ▼	Gov 1 ▼	2- Content ▼
Gov 2 Maturity Model	Backlog ▼	Gov 2 ▼	2- Content ▼
Gov 3 Maturity Model	Backlog ▼	Gov 3 ▼	2- Content ▼
Gov 4 Maturity Model	Backlog ▼	Gov 4 ▼	2- Content ▼
Gov 5 Maturity Model	Backlog ▼	Gov 5 ▼	2- Content ▼
IDE 1 Maturity Model	Backlog ▼	IDE 1 ▼	2- Content ▼
IDE 2 Maturity Model	Backlog ▼	IDE 2 ▼	2- Content ▼
IDE 3 Maturity Model	Backlog ▼	IDE 3 ▼	2- Content ▼
IDE 4 Maturity Model	Backlog ▼	IDE 4 ▼	2- Content ▼
IDE 5 Maturity Model	Backlog ▼	IDE 5 ▼	2- Content ▼
IDE 6 Maturity Model	Backlog ▼	IDE 6 ▼	2- Content ▼
IDE 7 Maturity Model	Backlog ▼	IDE 7 ▼	2- Content ▼
Con 1 Maturity Model	Backlog ▼	CON 1 ▼	2- Content ▼
Con 3 Maturity Model	Backlog ▼	CON 3 ▼	2- Content ▼
Con 4 Maturity Model	Backlog ▼	CON 4 ▼	2- Content ▼
Com 1 Maturity Model	Backlog ▼	COM 1 ▼	2- Content ▼
Com 2 Maturity Model	Backlog ▼	COM 2 ▼	2- Content ▼
Pro 1 Maturity Model	Backlog ▼	PRO 1 ▼	2- Content ▼
Content Redesign (Intern)	In progress ▼	N/A ▼	1- Context ▼
Pro 3 Maturity Model	Backlog ▼	PRO 3 ▼	2- Content ▼

▶️ VIRTUAL WORKSHOPS

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
CAO	Completed ▼	Gov 1 ▼	1- Context ▼
Overview	Completed ▼	N/A ▼	1- Context ▼
Privacy Impact Assessments	Completed ▼	IDE 6 ▼	1- Context ▼
Notice/Scanning	Completed ▼	COM 1 ▼	1- Context ▼
GDPA Req.	Completed ▼	N/A ▼	1- Context ▼
Data Sharing/Selling	Completed ▼	IDE 8 ▼	1- Context ▼
Privacy Report	Completed ▼	Gov 5 ▼	1- Context ▼
Incident Response	Hold ▼	PRO 3 ▼	1- Context ▼
CAO - Static Slides	Completed ▼	Gov 1 ▼	1- Context ▼
Overview - Static Slides	Completed ▼	N/A ▼	1- Context ▼
PIA - Static Slides	Completed ▼	IDE 6 ▼	1- Context ▼
Notice/Scanning - Static Slides	Completed ▼	COM 1 ▼	1- Context ▼
GDPA Req. - Static Slides	Hold ▼	N/A ▼	1- Context ▼
Data Sharing/Selling - Static Slides	Completed ▼	IDE 8 ▼	1- Context ▼
Privacy Report - Static Slides	Completed ▼	Gov 5 ▼	1- Context ▼
Records Management Workshop	Hold ▼	N/A ▼	2- Content ▼
GDPA Legislative Updates	In progress ▼	Gov 4 ▼	1- Context ▼
Incident Response - Static Slides	Hold ▼	PRO 3 ▼	1- Context ▼

🌐 WEBSITE

PROGRAM COMPONENT	STATUS	PRIVACY PRACTICE	CONTINUUM
Website 'Contact Us'	Completed ▼	N/A ▼	3- Engageme... ▼
Partner Resources	Completed ▼	N/A ▼	3- Engageme... ▼
Gov 1 Webpage	Completed ▼	Gov 1 ▼	2- Content ▼
Gov 2 Webpage	Completed ▼	Gov 2 ▼	2- Content ▼

Gov 3 Webpage	Completed ▼	Gov 3 ▼	2- Content ▼
Gov 4 Webpage	Completed ▼	Gov 4 ▼	2- Content ▼
Gov 5 Webpage	Completed ▼	Gov 5 ▼	2- Content ▼
IDE 1 Webpage	Completed ▼	IDE 1 ▼	2- Content ▼
IDE 2 Webpage	Completed ▼	IDE 2 ▼	2- Content ▼
IDE 3 Webpage	Completed ▼	IDE 3 ▼	2- Content ▼
IDE 4 Webpage	Completed ▼	IDE 4 ▼	2- Content ▼
IDE 5 Webpage	Completed ▼	IDE 5 ▼	2- Content ▼
IDE 6 Webpage	Completed ▼	IDE 6 ▼	2- Content ▼
IDE 7 Webpage	Completed ▼	IDE 7 ▼	2- Content ▼
Con 1 Webpage	Completed ▼	CON 1 ▼	2- Content ▼
Con 2 Webpage	Completed ▼	CON 2 ▼	2- Content ▼
Con 3 Webpage	Completed ▼	CON 3 ▼	2- Content ▼
Con 4 Webpage	Completed ▼	CON 4 ▼	2- Content ▼
Com 1 Webpage	Completed ▼	COM 1 ▼	2- Content ▼
Com 2 Webpage	Completed ▼	COM 2 ▼	2- Content ▼
Pro 1 Webpage	Completed ▼	PRO 1 ▼	2- Content ▼
Pro 2 Webpage	Completed ▼	PRO 2 ▼	2- Content ▼
Pro 3 Webpage	Completed ▼	PRO 3 ▼	2- Content ▼
Pro 4 Webpage	Completed ▼	PRO 4 ▼	2- Content ▼
Website Accessiblity	Hold ▼	N/A ▼	3- Engageme… ▼