



PHARE PROGRAMME TWINNING PROJECT NO. LV/2002/IB/OT-01

DATA STATE INSPECTION

KR.BARONA 5-4, 1050 RIGA, LATVIA • TEL.: +371 7814492 • FAX.: +371 7223556

29th September 2005

Final Project Report

1 - Identification of the project

Project no. and title: LV/2002/IB/OT-01 Data State Inspection

Project partners: The administrative authority of the Republic of Latvia
represented by the Data State Inspectorate
("Beneficiary Country")

and

The Ludwig Boltzmann Institute of Human Rights,
entitled to act in lieu of the public administration of the
Federal Republic of Austria ("Member State")

Budget: 536.132,95 €

Implementation period: 12 months, 15 September 2004 – 14 September 2005

Legal duration: 9 December 2005

Date of notification: 10 September 2004

The project implementation started on 15 September 2004 when the RTA arrived in Riga and ended 12 months later on 14 September 2005.

This Final Report is submitted by the Project Leaders BC and MS.

2 – Executive summary

The overall objective of this Twinning project has been to strengthen the administrative capacity of the Data State Inspectorate (DSI) in Latvia to implement the data protection *acquis communautaire* (including the independence of the DSI), in particular by improving the legal base of the DSI and through training.

Consequently, one of the main tasks of the project was to improve a legal basis for a powerful supervision of personal data protection by the way of installing a supervisory authority acting with complete independence in exercising the functions entrusted to it.

The initiative by the Cabinet of Ministers to amend the Latvian Constitution, the *Satversme*, to strengthen *inter alia*, the position of an independent yet powerful and effective Data State Inspectorate, and the concerting of a legal draft with the Ministry of Justice to amend the Personal Data Protection law (PDP law), were perspectives in the context of this project.

The special emphasise on the legal framework dimension, beside the analysis of administrative structures and proceedings, shapes the characteristic of the project.

The project is composed of 4 components, which could be described in terms of a summary

- Accordingly, the work under Component 1 of the present project was characterized by the drafting of proposals for the amendment to the PDP law, as well as the concerting of these drafts with the Ministry of Justice – the institution in charge of this process.
- Component 2 was aimed at an “Improvement of the operational base of the DSI” – hence, at a strengthened Data State Inspectorate.
- It was noted positively that the existing standard in the area of data security is rather high, thus offering a good basis for the drafting of a manual for these purposes (Component 3).
- The material drafted under Component 4 is aimed at providing targeted information to specific groups of readers and/or situations.

The project Steering Committee consisted of representatives of the DSI – director and Project manager BC, the Latvian Ministry of Justice, the Latvian Ministry of Finance, the Project leader MS and the RTA.

3 – Background

Following the societal transformation of the late 1980's and the early 1990's, Latvia emancipated of Soviet occupation by tying up with the democratic tradition of its interwar independence period and leaning on its Republican Constitution dating from the year 1922, the *Satversme*. Latvia has been developing into a modern state which turned inter alia in a member of NATO on 29 March 2004 and a member of the EU on 1 May of the same year. The *acquis communautaire* of the European Union/Community, according to the provisions of Directive 95/46/EC, apart from substantive law guarantees of personal data protection standards comprises also the setting up of a supervising authority acting in complete independence in exercising the functions entrusted to it.

A proper balance between the individual freedom to process information about others, on the one hand, and each person's right to informational self-determination, on the other, presupposes accurate legislation of the substantive as well as in the procedural law. All norms of law must be fully compatible with the *acquis communautaire*, i.e. with the above-mentioned Directive.

The following topics should be mentioned:

- **Independence of the supervisory authority and strengthening the administrative capacity of DSI**

As established by Title 1 Article 1 of the Covenant, the Latvian PDP law has incompletely transposed Article 28 of the Directive. Section 29 provides that the DSI shall be an "institution of state administration" placed "under the jurisdiction of the Ministry of Justice". Its Director "shall be appointed and released from his position by the Cabinet of Ministers pursuant to the recommendation of the Minister of Justice". As opposed to that, Article 28 of the Directive 95/46/EC provides that the supervisory authorities "shall act in complete independence in exercising the functions entrusted to them". In line with pertinent commentaries, the Commission interpreted and précised the understanding of the term "complete independence" in its communiqués, most recently, in the letter of 5 July 2005 by Commission Deputy President Frattini to the German Minister for Foreign Affairs Fischer (2003/4820 C[2005] 2098) the understanding of the term "complete independence" was interpreted and précised.

Comment [h1]:

Comment [h2]:

Comment [h3]:

The legal and factual putting in place of a supervising authority that meets the aforementioned strict independence criteria within the framework of the wording of the present Latvian Constitution would be at least problematic, considering its Article 58:

"58. The state administration institutions shall be subordinated to the Cabinet of Ministers."

Therefore, on 17 May 2005, the Cabinet of Ministers conceptually approved a “model for the settlement of the status of the “independent”¹ or stand-alone public institutions” drafted by a special working group that had been installed to tackle this complex problem. The ‘model’ shall be cited here in excerpts:

“The working group is of the opinion that the DSI, or any other authority that may inherit its functions, must be taken out of the hierarchical structure under the authority of the Cabinet of Ministers.”

(...)

The amendments to the Article 58 of the Satversme should be stated approximately in the following wording:

“58. The administrative institutions of the State shall be under the authority of the Cabinet of Ministers.

Stand-alone institutions, that are not under the authority of the Cabinet of Ministers in exercising the functions entrusted to them, may be established by law in the areas of regulation of public utilities, financial and capital markets supervision, and national broadcasting supervision, as well as to ensure effective control of the public administration.

Where this is necessary to fulfil their tasks, the power to take externally directed administrative decisions may be delegated by law to these institutions. The law foresees an effective mechanism to provide for the rule of law.

The administrative institutions of the State operate according to the principles of good governance.”

The proposed amended wording of the constitutional provision does not specify the names of these institutions or the exact areas that they would control. Still, there can be no doubt about the fact that the institution that supervises personal data processing would belong to the number of those State bodies that control the public administration. Essentially, the above mentioned proposal for the amendment of Article 58 of the Latvian Constitution for the first time would explicitly provide for the possibility of certain administrative institutions of the State outside of the hierarchical structure of the Cabinet of Ministers, among them those entrusted with the task to ensure effective control of the public administration.

- Substantive law concerning DP

A constitutional guarantee for the protection of privacy rights can be found in Article 96 of the *Satversme*:

“96. Everyone has the right to the inviolability of a private life, place of residence and correspondence.”

The Latvian Constitution provides a substantive guarantee for informational self-determination and is therefore fully in line with the requirements of the EU *acquis*, in particular, the requirements of Directive 95/46/EC in that respect.

- Notification and registration

¹ The text of the conception can be found at the website of the Ministry of Justice:
http://www.tm.gov.lv/lv/tiesibu_akti/politikas_planoshanas_dokumenti.html

The PDP law currently provides that nearly all data processing operations in the public as well as in the private sector are subject to the notification procedure. This has led to a situation that the DSI, in the four-and-a-half years of its existence has registered nearly 12.000 data processing operations. The Latvian PDP Law and the Administrative Procedure Law give the registration the character of an administrative act ("application for registration" [Sec 22 para 3]; "certificate of registration" [Sec. 22 para 3]; "refusal to register [Sec. 23]; "cancellation of a certificate" [Sec. 29 para 4 no. 5]; "unregistered systems shall cease operations" [Transitional provision No. 2]).

Despite of the perspective of adaptation of the legal framework, strengthening the administrative capacity of the DSI was a special emphasis of the project as clearly stressed in the Covenant (Component 2).

4 - Summary of the twinning activities during the reporting period

General Remarks

Originally, the project start was planned for implementation in End of 2003. Unfortunately, due to the demanded replacement of the originally designated Project Leader MS and RTA MS, and due to the change of Latvia's status from accession country to member state (with a moratorium on final contracting [EDIS]), the project began with a delay of about one year on 10 September 2004. Since the deadline for disbursement was 15 October 2005, it was provisionally foreseen to shorten the project duration from 12 to 10 months. This would further have prompted a procedurally complicated re-clustering of all project activities, to fit them into a tighter timeframe. After initial considerations in this direction have already begun, the Latvian Minister of Finance and the Head of the EC Delegation to Latvia signed an addendum to the Financing Memorandum on 13 October 2004 to extend the disbursement period for the Financing Memorandum for the Phare National Programme 2002 by 6 months until 15 April 2006. By this, there was no more need for cutting the project duration, and the initial 12-month implementation period could be retained.

On 15 September 2004, the new RTA, Mr. Thomas Giesen, arrived in Latvia and introduced himself at the Data State Inspectorate, and in the following days, also at the Administrative Office (Ministry of Finance), at the Central Financing and Contracting Agency (Ministry of Finance), and in the Ministry of Justice.

On 6 October 2004, the Assistant BC to the RTA, Mr. Marcis Gobins, started his work.

The first Steering Committee was held on 29 November 2004 and the final on 27 September 2005.

Component 1

Guaranteed Results

Strengthened Data State Inspection:

Secondary legal acts, defining powers, rights, and functions of the DSI according to the EC Directive 95/46 analyzed and necessary amendments proposed;

Component 1 of the project targeted at an "Improvement of the legal base of the DSI". It consisted of 3 activities.

- **Activity 1.1: "Preparation of a gaps analysis regarding the Latvian data protection legislation"**

Time schedule: September 2004 – April 2005
Carried out: started on 9. November 2004
finished on 4 June 2005

The Covenant defines the objective of this activity as follows:

"The PAA assistant will translate the Latvian legislation concerning data protection issues that is not already translated into English. The MS experts will prepare an in-depth analysis of Latvian data protection legislation and compare it to the data protection acquis. The main focus will lie on the requirements of the acquis regarding the independence of the DSI and its Director.

Furthermore the analysis will serve to evaluate the current Latvian data protection legislation in respect of the efficiency and practicability of the implementation, taking into account the experience with the implementation of the data protection acquis in Austria and Germany."

STE Mr. Christian Schnoor, who worked four working days (WDs) from 9 November until 12 November, prepared a gaps analysis regarding the Latvian data protection legislation, with an emphasis on the question of independence of the supervisory authority. He undertook a comparison of the Latvian data protection legislation to the relevant *EU acquis*. Mr. Schnoor drafted a proposal for the amendment to the Latvian Constitution and to Art.29 and 30 of the Latvian Personal Data Protection Law (PDP law). The draft was submitted to Director DSI, who further submitted it to the Ministry of Justice.

STE Mr. Thomas Mauersberger, who worked 10 WDs from 22 November until 3 December, prepared a synopsis of regulations in 11 other EU Member States with regard to the independence of the supervisory authority. He also undertook an analysis of data protection regulations in the field of security services, police, and secret services.

STE Ms. Elisabeth Duhr, who worked five working days (WDs) from 23 May to 27 May 2005, drafted the Final Report for Activity 1.1., which has been submitted to the Project leader BC on 31 May 2005 for the approval.

Results achieved: Written analysis with recommendations was prepared and the Project Leader BC approved its reception according the Project Covenant.

- **Activity 1.2: “Preparation of recommendations and proposals for the improvement of the Latvian data protection legislation”**

Time schedule: September 2004 – September 2005
Carried out: started on 22.11.2004
finished 27.9.2005

The Covenant defines the objective of this activity as follows:

*“The above gaps analysis on the Latvian data protection legislation will be discussed at a workshop and presented to the Latvian experts. In close co-operation with their Latvian colleagues, the MS experts will prepare recommendations and proposals for amendments of the Latvian Legislation which are necessary to eliminate possible inconsistencies in the current legislation with the *acquis* and streamlining the legal base for an efficient implementation. Therefore a special focus will lie on the strengthening of the legal base of the DSI, especially regarding the independence of the DSI and its Director. A reasoning for the proposed legal amendments will be prepared, providing background information for the responsible political and legislative organs.”*

STE Mr. Tino Naumann, who worked 10 WDs from 22 November until 3 December, prepared an in-depth analysis of inconsistencies in the present Latvian PDP law from the point of view of the *EU acquis* in matters other than independence, including proposals for necessary legal amendments. He also undertook an analysis of data protection regulations in the field of Electronic Communications Law. Just like Mr. Schnoor’s study of the PDP law, his scrutiny of the Electronic Communications Law resulted in suggestions for amendments to the relevant law. These suggestions were discussed at a meeting in the Ministry of Transport, Communications Department, between Mr. Naumann and the RTA Assistant, Mārcis Gobiņš, and Ms Iveta Zeidaka, Deputy Head of the Department, and Ms Ingrīda Gailume, Head of the General and International Issues Division.

STE Ms. Elisabeth Duhr, who worked 5 WDs from 6 December to 10 December (but see section 3 penultimate paragraph, above), undertook an in-depth analysis of the existing Latvian regulations in the field of notifications, including rather detailed recommendations for a simplification of the procedure, as well as other relevant aspects.

STE Mr. Gerd Wippermann, who worked 5 WDs from 13 December to 17 December (but see section 3 penultimate paragraph, above), drafted an alternative amendment of the PDP law (without amendment of the Constitution) on the basis of the draft law on the Ombudsman by the Chancellery of the State President.

STE Mr. Tino Naumann worked another 5 WD from 7 February until 11 February 2005. During his second assignment, Mr. Naumann resumed the work begun during

his first assignment and produced a revised draft amendment to the Electronic Communications Law and met two experts of the Ministry of Transport and Communications to discuss the Electronic Communications Law with regard to data protection.

STE Mr. Christian Schnoor, who worked 5 WDs from 10 January until 14 January 2005, picked up the preparatory work by Mr. Wippermann, and, in collaboration with the RTA and his Assistant, finalised the Draft proposal on Law on the Ombudsman.

STE Mr. Thomas Mauersberger, who worked 5 WDs from 5 February until 11 February 2005, produced a further refined analysis of the data protection provisions and their practical application in the area of police, security and the prosecutor's office. Due to the efforts of the DSI he had the opportunity to meet representatives of the State Police, the Prosecutor General's office, and the Office for the Protection of the Constitution.

The STEs Ms. Duhr as well as Mr. Schnoor, Naumann, Mauersberger, and Wippermann have worked 35 WDs on the issue.

STE Dr. Tino Naumann worked 5 WDs from 24 April until 29 April 2005. During this assignment, Dr. Naumann resumed the work begun during his first assignment and produced a revised draft proposals for the amendment to the Personal Data Protection Law, with a focus on aspects such as notification/registration and appointing of (internal) personal data protection officials, i.e. other aspects than independence of the supervisory authority.

STE Mr. Thomas Mauersberger, who worked 5 WDs from 24 April until 29 April 2005, drafted proposals of the amendments to various laws in the area of police and security (with reasoning/commentary).

STE Prof. Dr. Hans-Ullrich Paeffgen, who worked 4 WDs from 17 May until 20 May 2005, picked up on the work by Mr. Mauersberger and focussed his analysis on some of the key aspects of data protection in the area of police and security.

STE Klaus Leroff, who worked 5 working days (WDs) from 6 June to 10 June 2005, worked on the draft proposals for the amendment to the Personal Data Protection Law (PDP law), with a emphasis on the Data Supervisor's interrelation with the Latvian Parliament.

STE Professor Dr. Marie-Theres Tinnefeld worked 10 WDs from 18 July until 29 July 2005, and drafted the final report for this activity, which includes further recommendations and proposals to the Latvian PDP law concerning the question of informed consent, transfer of personal data within the EU as well as to third countries, on the interrelation between data protection and freedom of scientific research, as well as on the interrelation between data protection and freedom of the media, and with regard to certain sectoral laws (Electronic Communications Law, Law on Police, Investigatory Operations Law, and other laws on security authorities).

STE Dr. Christian Schnoor completed the activity during his last secondment to Riga, which took place from 29 August to 2 September 2005 (5 WD's). Dr. Schnoor did a final check-up that includes a review of the draft proposals for the amendment to the

PDP law before it can be submitted to the Cabinet of Ministers via the Ministry of Justice.

STE Wolfgang Kilian and STE Nikolaus Forgó worked on completion of proposals for the Electronic Communication Law amendments and the final draft proposal for PDP law.

Results achieved: Recommendations and proposals for the improvement of the Latvian data protection legislation were elaborated and the Steering Committee of the project in general approved it on 27 September 2005. The recommendation will be submitted to the Cabinet of Ministers via the Ministry of Justice.

- **Activity 1.3: “Preparation of comments on the Latvian data protection legislation”**

Time schedule: May 2005 – September 2005
Carried out: started on 12. April 2005
finished on 19. August 2005

The Covenant defines the objective of this activity as follows:

“Based on the under 1.1. elaborated analysis, MS experts will prepare comments on the Latvian data protection legislation reflecting also the most important decisions of the European Court of Justice, the European Court of Human Rights as well as the Austrian and German Courts.

The comments will be translated into Latvian. These comments on the Latvian data protection legislation will serve as an important tool for the future day-to-day work of all institutions involved in data protection. The main aim of these comments will be to give examples from the Case Law of the European Court of Justice and national MS courts especially on the interpretation and implementation of unclear and vague terms of the data protection legislation.”

STE Prof. Dr. Hans-Werner Laubinger, who worked 4 WDs from 12 April until 15 April 2005, produced a commentary on the question of the legal nature and consequences of notification/registration of personal data processing systems.

STE Ms. Elisabeth Duhr, who worked five working days (WDs) from 30 May to 3 June 2005, wrote a legal commentary on Article 7 of the Latvian Personal Data Protection law (e.g. consent of a data subject to processing of his personal data).

STE Ms. Elisabeth Duhr, who worked five working days (WDs) from 15 August to 19 August 2005, wrote the final report on the activity, including commentaries on the PDP law.

Results achieved: Comments on the Latvian data protection legislation were elaborated and approved by the Project Leader BC.

Component 2

Guaranteed Results

Elaborated and implemented DSI capacity development strategy;

Data subject and data processors informed on data protection issues

Means for information of data subject developed:

Elaborated strategic plan on information of society functioning;

Elaborated publications on rights of data subject on rights and obligations of systems controllers, on sensitive data protection and on legal acts accessible to all levels of society and to all levels of administration;

Workshop and seminars on personal data protection organised;

Conference on Personal data protection for data protection specialists from Baltic States organised, because of necessity to consolidate data protection specialists and to promote future co-operation between similar institutions. It is essential to make co-operation closer between candidate states for Europe Union with a similar conditions.

2.2. Means for information of data controllers processing as state administrations and institutions as civil enterprises developed:

Seminars on safe and legal personal data processing systems and personal data processing organised (in particular respect of security administration and social welfare administration);

Component 2 targeted at an "Improvement of the operational base of the DSI". It consists of three activities.

- **Activity 2.1: "Preparation of a development strategy for the DSI"**

Time schedule: May 2005 – September 2005

Carried out: started on 29. March 2005
finished on 17. August 2005

The Covenant defines the objective of this activity as follows:

"Experts from MS Data Protection Authorities will analyse the tasks of the DSI and evaluate, based on the experience and needs of Data Protection Authorities in the MS, provided at a workshop, the current and expected future work load of the DSI, taking into account the Latvian circumstances.

Based on this analysis, the MS experts in co-operation with the Latvian experts will prepare a development strategy and resources needs forecast of the DSI, indicating the staff, number of employees and their qualification, budget, equipment etc. needed by the DSI to fulfil its tasks in a long term.

Regarding the required staff, the development strategy will include recommendations on staff relationship, in-house training and staff motivation.

In the workshop with its various topics (organisational issues, the internal information procedures of the DSI, the management of claims and complaints, the registration of notifications) the STEs will represent different approaches."

STE Mr. Klaus Leroff, who worked 10 WDs from 29 March until 11 April 2005, concentrated his work on possible organisational structures concerning the authority for personal data protection.

STE Mr. Peter Paul Klein, who worked 5 WDs from 11 April until 15 April 2005, summarised information on the organisational structure of the DSI (Data State Inspectorate). Mr. Klein also worked 5 WDs from 4 July until 8 July 2005, and a further 3 WD's from 15 August to 17 August 2005 (a total of 8 WDs in the fourth project quarter), completed his paper on the organizational structure of the DSI (Data State Inspectorate).

Results achieved: On the basis of the existing DSI development strategy a proposal for improvements was elaborated. It was in general approved by the project Steering Committee on 27 September 2005. The Project Leader BC, the Project Leader MS and the Steering Committee are not responsible for the opinions of the experts, especially in details.

- **Activity 2.2: "Preparation of manuals for the DSI on internal information flow, register of notifications and management of claims and complaints"**

Time schedule: January 2005 – September 2005
Carried out: started on 31 January 2005
finished on 12 August 2005

The Covenant defines the objective of this activity as follows:

"MS Experts will analyse the current practice of the DSI regarding the

- *internal information flow by means of the unitary internal information system*
- *the management of claims and complaints*
- *keeping of a register of notifications*

These analyses will mainly focus on an efficient and grass-roots handling of the above tasks.

Based on the above analyses and the experience of Data Protection Authorities of the MS provided at a workshop, manuals will be prepared to support the day-to-day work of the DSI regarding the above issues, and to increase efficiency."

STE Mr. Andreas Schneider, who was in Latvia from 31 January until 4 February 2005. Mr. Schneider discussed with DSI staff their work. He elaborated comments, namely "Complaints management of the Data State Inspectorate" of the Republic of Latvia (DSI)" and "Supplements concerning the internal registration notifications process of the DSI".

STE Ms. Claudia Golembiewski, who worked 5 WD's from 27 June to 1 July 2005, STE Dr. Tino Naumann, who worked 10 WD's from 27 June to 8 July 2005, STE Dr. Eva Souhrada, who worked 5 WD's from 4 July to 8 July 2005, and STE Mr. Thomas Mauersberger, who also worked 5 WD's from 4 July to 8 July 2005 elaborated written manuals to support the day-to-day work regarding internal information flows, the management of claims and complaints and the notifications. These manuals were submitted to the Project Leader BC and will be translated into Latvian according to the Project Covenant.

Results achieved: Manuals for the DSI on internal information flow, notifications and management of claims and complaints were elaborated by experts and their reception was approved by the Project Leader BC according the Project Covenant.

- **Activity 2.3: 'Study trips to Austrian and German Data Protection Institutions'**

Time schedule: April 2005 – September 2005
Carried out: started on 13 June 2005
finished on 7 September 2005

The Covenant defines the objective of this activity as follows:

"During a study trip to Austrian and German data protection institutions, the key staff of the DSI will get familiar with the methods of implementing data protection legislation in EU MS. The institutions to be visited will be selected jointly with the Beneficiary according to necessity for and fields of interests of the participating Latvian experts; they will include the Austrian Data Protection Commission at the Federal Chancellery and the Data Protection Commission of Saxony. Topics covered during the study trips will include practical issues regarding data processing and the prior checking as well as management of the institutions visited and the co-operation between the institutions."

A study trip to Vienna took place from 13 June to 17 June 2005. The following DSI staff participated at the study trip: Mr. Egons Ālers, Mrs. Aiga Balode, Mrs. Agnese Gusarova, Mr. Māris Leščinskis, Ms. Signe Plūmiņa, Mr. Reinis Riževs; from the project team, RTA Dr. Thomas Giesen, RTA Assistant Mr. Mārcis Gobiņš and translator/interpreter.

The programme that was prepared by the Ludwig-Boltzmann-Institute of Human Rights and by the Project Leader MS and conveyed valuable experience from the day-to-day work of the Austrian colleagues. An evaluation form for the study trip was submitted to the Project Manger BC on 12 July.

A secondment of Ms. Balode and Ms. Plūmiņa to the German Federal Data Protection Commissioner in Bonn took place from 11 July to 15 July 2005 and provided an introduction in the working areas and methods of the respective institution.

During a two days visit to the Independent Centre for Privacy Protection Schleswig-Holstein (ICPP) from 6 September to 7 September 2005 Mr. Marcis Ruikis and Mr.

Janis Volberts both DSI experts were studying the organizational structure and methods of work of the ICPP.

Results achieved: An introduction to the working methods of various institutions in the field of data protection on site was received during the study trips; reports on the study trips were prepared.

Component 3

Guaranteed results:

Component 3 of the project targeted at an “Improvement of DSI capacity in respect of inspections of personal data processing systems”. It consisted of 1 activity.

- **Activity 3.1: “Preparation of a manual on auditing the security of personal data processing systems”**

Time schedule: December 2004 – September 2005
Carried out: started on 31 January 2005
 finished on 15 July 2005

The Covenant defines the objective of this activity as follows:

“The MS experts will analyse the current practice of DSI regarding auditing the security of information systems (incl. personal data processing systems). Considering the results of this analysis and based on the best practice of the EU MS, international standards (ISO 17799, ISO15408) a draft manual will be prepared in cooperation with the experts of DSI. During the workshop draft manual will be discussed with the experts of DSI as well as how to implement the best practice of auditing the security of information systems (incl. personal data processing systems). Following the workshop, the MS experts in co-operation with Latvian experts will improve the manual on auditing the security of information systems (incl. personal data processing systems), with the aim to overcome the identified potential shortcomings and increase efficiency of the DSI. This manual is intended to be approved by the Project Leader CC/ Director of the DSI for further use of the DSI. The manual will be translated into Latvian. During the implementation of this activity the STEs coming from different institutions will represent different approaches.”

STE Mr. Roman Maczkowsky, who was in Latvia from 3 to 7 January 2005 (5 WD) and from 21 to 25 February 2005 (5 WD), during his first mission started to analyse the existing situation and could already started to work on manual on auditing the security of personal data processing systems.

STE Mr. Thomas Probst, who was in Latvia from 21 to 25 February 2005 (5 WD), worked together with Mr. Maczkowsky on further preparation of the manual on auditing the security of personal data processing systems.

STE Mr. Roman Maczkowsky, who was on a mission to Latvia from 4 April to 8 April 2005 (5 WD), during which he continued his work on a manual on auditing the security of personal data processing systems. He continued his work for 5 WDs from 11 July to 15 July 2005, during this assignment, in a joint effort with STE Mr. Jan Möller, who worked as well 5 WDs from 11 July to 15 July 2005, completed the work on a manual on auditing of personal data processing systems. The manual was submitted to the Project Leader BC.

Results achieved: A manual on auditing the security of personal data processing systems-Focusing on European Union Member States practice and taking into account specific requirements and circumstances in Latvia was elaborated and its reception was approved by the Project Leader BC according the Project Covenant.

Component 4

Guaranteed Results

Component 4 of the project targeted at "Information and awareness raising concerning data protection." It consisted of five activities.

- **Activity 4.1: "Development of a public awareness strategy for the general public"**

Time schedule: February 2005 – September 2005
Carried out: started on 16.February 2005
finished 23.August 2005

The Covenant defines the objective of this activity as follows:

"The MS experts will analyse the current practice regarding information campaigns for the general public in Latvia and the existing information material. The result of this analysis will be discussed during a workshop with the DSI experts, and an overall strategy for a public information campaign will be developed, taking into account the experience with public information campaigns in Austria and Germany.

The strategic plan for an awareness campaign will be approved by the Project Leader CC/ Director of DSI for implementation."

STE Ms. Kotschy has been at the DSI from 16 until 18 February 2005, 2,5 WDs in total. She produced a paper outlining some of the main features and contents of a public awareness strategy. She thereby considered the public awareness strategy of the DSI.

STE Ms. Kirsten Ruhnke, who worked 2 WD's from 22 August to 23 August 2005, picked up on the work begun by the STEs Mr. Bannasch and STE Ms. Kotschy, as well as on the basis of an existing DSI strategy. She drafted an awareness strategy on personal data protection issues for the general public on the basis of the existing DSI strategy.

Results achieved: public awareness strategy on the basis of the current DSI strategy was elaborated. The Project Leader BC according the Project Covenant approved its reception.

- **Activity 4.2: “Development of an awareness strategy for data controllers and processors (date protection in security administrations police, district attorneys, intelligence services) as far as it concerns the European law”**

Time schedule: April 2005 – September 2005
Carried out: started on 8.August 2005
finished on 12.August 2005

The Covenant defines the objective of this activity as follows:

*“The MS experts will analyse the current practice regarding information campaigns for data controllers and processors in Latvia and the existing information material. The result of this analysis will be discussed during a workshop with the DSI experts, and a written strategy for a public information campaign for data controllers and processors will be developed, taking into account the experience with such information campaigns in Austria and Germany.
The strategic plan for an awareness campaign among data controllers and processors will be approved by the Steering Committee for implementation.”*

STE Professor Dr.Dietmar Jahnel, who worked 5 WD's from 8 August to 12 August 2005, drafted an awareness strategy with strategic plan for data controllers and processors which were submitted to the Steering Committee.

Results achieved: strategy for public awareness raising campaign was prepared. It was in general approved by the project Steering Committee on 27 September 2005. The Project Leader BC, the Project Leader MS and the Steering Committee are not responsible for the opinions of the experts, especially in details.

- **Activity 4.3: ”Creation of material for an awareness campaign among data controllers and workshops / training for data controllers / processors and judges”**

Time schedule: May 2005 – September 2005
Carried out: started on 15 August 2005
finished on 26 August 2005

The Covenant defines the objective of this activity as follows:

*“Based on the under 4.2. developed strategy, the MS experts and the DSI experts will create concepts for a brochure including checklists on data protection issues for the day-to-day-work of data controllers.
MS experts will conduct training and information seminars for data controllers, processors by using the prepared information material. DSI experts will*

participate in these seminars and support the MS experts. All participants of these seminars will receive evaluation sheets, in order to review the acceptance of the training provided and adjust the training if appropriate. In a debriefing workshop, the DSI experts participating in these seminars and the MS experts holding these seminars will analyse the above evaluation sheets and develop recommendations to increase the quality of the training and information provided for data controllers and, if necessary, adjust the information material."

STEs Mr. Philip Scholz, who worked 3 WD's from 15 August to 17 August 2005, Mr. Gregor Scheja, who worked 4 WD's from 22 August to 25 August 2005 and Mr. Lukas Gundermann, who worked 10 WD's from 15 August to 26 August 2005 created material for awareness campaigns among data controllers.

A workshop on "Latvian Data Protection Law and coming changes and International Data Protection Law" was successfully carried out at 25 August by Mr. Lukas Gundermann and Mr. Gregor Scheja.

Results achieved: a brochure and material for awareness campaigns among data controllers was elaborated and training provided for data controllers and processors.

- **Activity 4.4: "Creation of material for an awareness campaign among the general public"**

Time schedule: February 2005 – September 2005
Carried out: started on 21 February 2005
finished on 5 August 2005

The Covenant defines the objective of this activity as follows:

"Based on the under 4.1. developed strategy, the MS experts and the DSI experts will create concepts for leaflets on the rights of data subjects under Latvian and EU legislation and the role of the DSI for the general public concerning social welfare.

The information material prepared will be presented to the Project Leader CC/ Director of DSI for approval for further general use."

STE Mr. Bernhard Bannasch, who worked 5 WDs from 21 February until 25 February 2005, made considerations for material for an awareness campaign among the general public. He also discussed with DSI staff their work.

On the basis of the work of STE Mr. Bannasch in February, the STEs Ms. Theresa Philippi and Mr. Nils Leopold (both 5 WD from 1 to 5 August) created material for the raising of public awareness among the general public. The results of the STEs' work were presented to the Steering Committee and then translated into Latvian.

Results achieved: The brochure for the awareness campaigns among the general public was elaborated.

- **Activity 4.5: “Seminars for Judges”**

Time schedule : May 2005 – September 2005
Carried out: started on 5 September 2005
finished on 9 September 2005

The Covenant defines the objective of this activity as follows:

“Two one day seminars for judges will be carried out by an MS Expert, who is Judge, to raise awareness among Latvian Judges in respect of the court as data controller and to make the Latvian Judges familiar with the most important case law concerning the implementation of the data protection acquis.

The first seminar will be on the obligations of the courts as data controllers, respectively data protection at courts.

The second seminar will be on the most prominent data protection case law of the ECJ and selected MS courts.”

The STEs Professor Dr. Nikolaus Forgó and Professor Dr. Wolfgang Kilian prepared and carried out a one-day seminar for judges and other lawyers on 6 September 2005 to increase awareness and knowledge in the field of data protection based on the *acquis communautaire*, and in particular, on the case law of the European Courts and the EU Member State Courts.

The STE Mr. Manfred Krause prepared and carried out a one-day seminar only for Latvian judges on 9 September 2005.

Results achieved: two seminars (together more than 100 persons) were organized.

5 - Evaluation of the Twinning project

5.1 Benchmarks

In the following chapter the benchmarks as defined by the Covenant will be verified and compared to the project results. The working results referred to below are listed in Detail in Chapter 7.

Component 1 “Improvement of the legal base of the DSI”

Activity 1.1: Preparation of a gaps analysis regarding the Latvian data protection legislation

Benchmark: *A written gaps analysis identifying potential shortcomings of the Latvian legislation especially in respect of the independence of the DSI and its Director and obstacles for an efficient implementation of the acquis was prepared and approved by the project Leader CC.*

✓ Done

Written results: documents No 1-No 3 according to list of annexes

Worked on in Quarter 1, Quarter 2

Activity 1.2: Preparation of recommendations and proposals for the improvement of the Latvian data protection legislation

Benchmark: *Recommendations and proposals for amendments to the Latvian data protection legislation, including amendments regarding the independence of the DSI and its Director were approved by the Steering Committee and submitted to the Latvian Council of Ministers for approval, supported with a written reasoning for the proposed amendments providing back ground information.*

✓ Done

Written results: documents No 4-No 9 according to list of annexes

Worked on in Quarter 1, Quarter 2, Quarter 3, Quarter 4

Activity 1.3: Preparation of Comments on the Latvian data protection legislation

Benchmark: *Comments on the Latvian data protection legislation were prepared, providing an interpretation and implementation guideline in the light of the case law of the European Court*

Twinning Project No. LV/2002/IB/OT-01, Final Project Report, 2005-09-29

of justice and selected decisions of MS courts and authorities. The comments were translated into Latvian.

✓ **Done**

According to the Project Covenant the comments were submitted for translation.

Written results: document No 10 according to list of annexes

Worked on in Quarter 3, Quarter 4

Component 2 “Improvement of the operational base of the DSI”

Activity 2.1: Preparation of a development strategy for the DSI

Benchmark: *A comprehensive development strategy for the DSI, including a forecast of the resources needs of the DSI in the future was prepared and approved by the Steering Committee.*

✓ **Done**

Written results: document No 11 according to list of annexes

Worked on in Quarter 3, Quarter 4

Activity 2.2: Preparation of manuals for the DSI on internal information flow, register of notifications and management of claims and complaints.

Benchmark: *Manuals for the day-to-day work of the DSI regarding*
- internal information flow
- management of claims and complaints
- keeping a register of notifications
were prepared, approved by the project Leader CC and translated into Latvian.

✓ **Done**

According to the Project Covenant the comments were submitted for translation.

Written results: documents No 12-No 17 according to list of annexes

Worked on in Quarter 2, Quarter 4

Activity 2.3: Study trip to Austrian and German Data Protection Institutions

Benchmark: *Key staff of the DSI got familiar with the working methods of MS data protection Institutions and received training on practical skills.*

After the study trip the PAA and the participating Experts prepared a report on which information received during the study trip is useful for the DSI and should be taken into account in respect of the day to day work of the DSI.

✓ **Done**

Written results: documents No 18 according to list of annexes

Carried out in Quarter 3, Quarter 4

Component 3 “Improvement of DSI capacity in respect of inspections of personal data processing systems”

Activity 3.1: Preparation of a manual on auditing the security of personal data processing systems

Benchmark: *Written manual for the day-to-day work of the DSI on auditing the security of personal data processing systems, translated into Latvian and approved by the Project Leader CC/ Director DSI.*

✓ **Done**

Written results: document No 19 according to list of annexes

Worked on in Quarter 2, Quarter 3, Quarter 4

Component 4 “Information and awareness raising concerning data protection.”

Activity 4.1: Development of a public awareness strategy for the general public

Benchmark: *A written strategy for a public awareness campaign for the general public was prepared, based on existing awareness campaigns / material in Latvia and based on the experience with awareness campaigns in the MS. The strategy was agreed on between MS and CC experts and was approved by the Project Leader CC/ Director of DSI. The strategy was translated into Latvian.*

✓ **Done**

According to the Project Covenant the comments were submitted for translation.

Written results: documents No 20-No 22 according to list of annexes

Worked on in Quarter 2, Quarter 4

Activity 4.2: Development of an awareness strategy for data controllers and processors (date protection in security administrations police, district attorneys, intelligence services) as far as it concerns the European law

Benchmark: *A written strategy for a public awareness campaign for data controllers and processors was prepared, based on existing awareness campaigns / material in Latvia and based on the experience with awareness campaigns in the MS. The strategy was agreed on between MS and CC experts and was approved by the Project Leader CC.*

✓ **Done**

Written results: document No 23 according to list of annexes

Worked on in Quarter 4

Activity 4.3: Creation of material for an awareness campaign among data controllers and workshops / training for data controllers / processors and judges

Benchmark: *Based on the under 4.2. prepared awareness campaign strategy, brochure and information to be published were produced for data controllers. This brochure and this information were translated into Latvian. During workshops data controllers and processors received training on their duties under Latvian and EU legislation and the prepared information material was introduced.*

✓ **Done**

According to the Project Covenant the comments submitted for translation.

Written results: document No. 24- No 26 according to list of annexes

Worked on in Quarter 4

Activity 4.4: Creation of material for an awareness campaign among the general public (in particular respect of a development of an awareness strategy for data protection in social welfare administrations)

Benchmark: *Based on the under 4.1. prepared awareness campaign strategy, the brochure to be published was produced for the general public. This brochure was translated into Latvian.*

✓ **Done**

According to the Project Covenant the comments were submitted for translation.

Written results: documents No 27 – No 32 according to list of annexes

Worked on in Quarter 2, Quarter 4

Activity 4.5: Seminars for Judges

Benchmark: *A minimum of 10 Latvian Judges received training and information on data protection at court and the case law of the ECJ and MS courts on the implementation of the data protection acquis.*

✓ **Done**

Worked on in Quarter 4

5.2 Time Schedule

	Sept. 2004	Oct. 2004	Nov. 2004	Dec. 2004	Jan. 2005	Feb. 2005	March. 2005	April. 2005	May. 2005	June. 2005	July. 2005	Aug. 2005	Sep. 2005
Month	1	2	3	4	5	6	7	8	9	10	11	12	13
Act. 1.1.	scheduled								carried out				
Act. 1.2.	carried out												
Act. 1.3.									scheduled				carried out
Act. 2.1.								carried out		scheduled			
Act. 2.2.					scheduled			carried out					
Act. 2.3								carried out		scheduled			
Act. 3.1.				scheduled									
Act. 4.1.					scheduled			carried out					
Act. 4.2.								carried out				scheduled	
Act. 4.3.								carried out			scheduled		
Act. 4.4.					carried out								
Act. 4.5.								carried out				scheduled	

scheduled
carried out

6 - Conclusions and recommendations

6.1 Conclusions

As an overall conclusion it can be stated that the legislation regarding personal data protection issues is generally in line with the *acquis communautaire* but improvements of practice and amendments to the law would be necessary.

One of the most important challenges will be the providing of the independent data protection supervision in the sense of the EU *acquis*.

An analysis which was carried out by several STEs revealed some uncertainties of the PDP Law which should be taken into account when next amending the law. Already during the project implementation phase some recommendations were forwarded to the Ministry of Justice which had started to work on the amendments to the legislation regarding the personal data protection issues meanwhile. The other recommendations will be submitted to the Cabinet of Ministers via the Ministry of Justice.

According to the overall objective of the current Twinning project, the administrative capacity of the Data State Inspectorate (DSI) was strengthened by information, analyses, proposals and discussions in order to implement the data protection *acquis*.

Data security issues are playing a more and more important role in connection with data protection and it was noted positively that the existing standards in the area of data security are rather high in Latvia.

It was also a focus of the project to raise awareness of the importance of data protection in Latvia.

All texts which were elaborated within the project and should be translated have been submitted for translation by the DSI. After the translation the project materials would be available on the website of the DSI.

The workshops foreseen in the Activities 1.2., 2.1., 2.2., 4.1., 4.2. were not carried out since both the Project Leaders agreed to transfer the Short term experts' work for other important activities (see the Side letters).

As far as the Final Report refers to the approvals of the Project Leader BC and the Steering Committee it does mean that the approval is given in general regarding the results and the outcomes of the project. The Project Leader BC, the Project Leader MS and the Steering Committee are not responsible for the opinions of the experts, especially in details.

6.2 Recommendations

- **Component 1:**

The work under Component 1 was characterized by the drafting of proposals to amendments to the PDP law and of the Electronic Communication Law, because the laws in their present version do not measure up to the standard of the *acquis* concerning the requirement of independence of the supervisory authority. Regarding this point there are following recommendations:

- To reach this standard it should be considered to amend the Art. 58 of *Satversme*.
- The PDP and the Electronic Communication Law should be amended in order to reach compliance.
- The overall objective is to install a fully independent supervisory authority for personal data protection in line with the requirements of the *acquis*.
- Proposals for the amendments to Art 58 of *Satversme* and to PDP and Electronic Communication Law can be found in annex No 4-No 6.

- **Component 2:**

Component 2 aimed at improving the operational base of the DSI. A development strategy from June 2004 based on 4 global targets and appending activities and milestones already exists. Regarding this point there are following recommendations:

- The basic targets are to ensure supervision of personal data protection in accordance with the requirements of the PDP Law as well as those of the European Union.
- Above all the DSI should continue the development to a reliable and competent assistant in the fields of privacy protection and freedom of information and to increase effectiveness and quality in the execution of the functions delegated to DSI.
- The development strategy, elaborated on the bases of existing DSI strategy, was proposed by the short term expert can be found in annex No 11.

Furthermore manuals for the day to day work of the DSI regarding internal information flow, management of claims and complaints and register of notification were elaborated. Regarding this point there are following recommendations:

- Concerning the manual on internal information flow organisation, legal requirements for the DSI can be found in annex No 15.
- Since the Administrative Violations Code does not foresee explicitly the differentiation between the levels of fines in the future the fines could be further adopted taking into account a differentiation between formal and substantive infringements.
- For the future data protection supervision institution it could be considered to solve some types of cases without administrative decision.
- An important goal also for the future should be the prevention of infringements before imposing fines.
- The existing development strategy of DSI was supplemented in order to provide information on specialisation of the employees.
- Concerning the technical aspect it would be useful to make more information available on the Internet website of the DSI and also to publish anonymized decisions of the DSI.

- Regarding to the manual for the register of notification, some forms for the notification of automatic personal data processing information were elaborated.

- **Component 3:**

It was noted positively that the existing standards in the area of data security are rather high, which offered a good basis for the drafting of a manual for these purposes. However, it has to be mentioned:

- For technical requirements in this field see the Manual on auditing the security of personal data processing systems (annex No 19).

- **Component 4:**

To promote the awareness of data protection issues among the general public, as well as among data controllers and data processors it was necessary to draft PR material, like brochures - the material drafted under Component 4 is aimed at providing information to specific groups of readers and/or situations. Regarding this point there are following recommendations:

- It is necessary to improve the public relations measures and create ready to read information on the DSI and its tasks.
- There should be at least one employee who is responsible for the awareness campaigns and public relations as it is now.
- A brief guideline of recommendations can be found in annex No 20-No 22.
- Concerning the development of an awareness strategy for data controllers and processors it would be necessary to establish a data protection curriculum for people who are interested to apply for the position of a data protection official. In this curriculum the rights and obligations of the data controllers and processors should be explained, and examples should be given how certain types of data protection relevant situations have been dealt with in Latvia so far, in other EU Member States and at the European Court of Justice.
- The Internet should be involved in the process of providing information. Therefore the webpage of the DSI should cover different aspects on data protection.
- Also an e-learning platform could be developed.
- For elaborated information see the brochures in annex No 24.

Furthermore, material for the general public in the field of social welfare and social security was elaborated. Regarding this point there are following recommendations:

- Awareness rising for data protection issues within the population should be based on the existence of procedural and organisational provisions in order to enable the inhabitants to address his or her individual complaint both to the controller and to the supervisory authority.
- The two Latvian legal acts of social policy, namely the Law on Social Services and Social Assistance and the Support for Unemployed Persons

and Persons Seeking Employment Law lack references to data protection issues. For specific recommendations see annex No 27.

Riga, 29 September 2005

Submitted by:

.....
Ms. Signe Plūmiņa
Director of the Data State Inspectorate
Innsbruck
Project Leader BC

.....
Dr. Friedrich Lachmayer
Professor at the University of

Project Leader MS

Approved by:

.....
Mr. Bērziņš
Deputy State Secretary on General Issues
Senior Programme Official

.....
Ms. Ruta Konstante
Director of Department of EU and International Affairs
Administrative Office
of the Ministry of Finance

7 – List of Annexes

No.	Comp.	Activity	Name of document	Author	Path on CD
1	Comp. 1	Act. 1.1	Act.1.1_Final Report	Duhr	Comp. 1 / Act. 1.1
2	Comp. 1	Act. 1.1	Act.1.1_DP in public security and criminal law	Mauersberger	Comp. 1 / Act. 1.1
3	Comp. 1	Act. 1.1	Act.1.2_Comparison Latvian PDP law & Directive	Gobiņš	Comp 1 / Act 1.1
4	Comp. 1	Act. 1.2	Act.1.2_Final Report	Tinnefeld	Comp. 1 / Act. 1.2
5	Comp. 1	Act. 1.2	Act.1.2_Draft Amendment to Latvian PDP law	Giesen Gobiņš	Comp 1 / Act 1.2
6	Comp. 1	Act. 1.2	Act 1.2_Art. 58 Satversme LV	Giesen Gobiņš	Comp 1 / Act 1.2
7	Comp 1	Act.1.2	Act.1.2_Directive 95/46/EC	Naumann	Comp. 1 / Act. 1.2
8	Comp. 1	Act. 1.2	Act.1.2_Draft Law Ombudsman	Wippermann Schnoor	Comp. 1 / Act. 1.2
9	Comp. 1	Act. 1.2	Act.1.2_teksts latviski	Paefgen	Comp. 1 / Act. 1.2
10	Comp. 1	Act. 1.3	Act.1.3_Final Report	Duhr Forgo	Comp. 1 / Act. 1.3
11	Comp. 2	Act. 2.1	Act.2.1_Final Report	Klein	Comp. 2/ Act. 2.1
12	Comp. 2	Act. 2.2	Act 2.2_Analysis status quo manag. claims&complaints1	Golembiewski	Comp. 2 / Act. 2.2
13	Comp. 2	Act. 2.2	Act 2.2_Analysis status quo manag. claims&complaints2	Souhrada- Kirchmayer	Comp. 2 / Act. 2.2
14	Comp. 2	Act. 2.2	Act.2.2_Manual Management Claims and Complaints	Souhrada- Kirchmayer	Comp. 2 / Act. 2.2
15	Comp. 2	Act. 2.2	Act.2.2_Manual Information Flow	Koenig Mauersberger	Comp. 2 / Act. 2.2
16	Comp. 2	Act. 2.2	Act.2.2_Manual Notification-Registration	Naumann	Comp. 2 / Act. 2.2
17	Comp. 2	Act. 2.2	Act.2.2_Manual Appointment Official	Naumann	Comp. 2 / Act. 2.2
18	Comp. 2	Act. 2.3	Act.2.3_Study Visits	Plūmiņa, Balode, Gusarova , Ālers Riževs, Lescinskis Ruikis, Volberts	Comp. 2 / Act. 2.3
19	Comp. 3	Act. 3.1	Act.3.1_Manual Audit Security Data Processing	Maczkowsky Möller	Comp. 3 / Act. 3.1
20	Comp. 4	Act. 4.1	Act.4.1_Final public awareness strategy	Ruhnke	Comp. 4 / Act. 4.1
20a	Comp. 4	Act. 4.1	Act.4.1_annex_examples	Ruhnke	Comp. 4 / Act. 4.1
21	Comp. 4	Act. 4.1	Act.4.1_Prep Public Awareness Strategy1	Kotschy	Comp. 4 / Act. 4.1
22	Comp. 4	Act. 4.1	Act.4.1_Prep Public Awareness Strategy2	Bannasch	Comp. 4 / Act. 4.1
23	Comp. 4	Act. 4.2	Act.4.2_Controllers Awareness strategy	Jahnel	Comp. 4 / Act. 4.2
24	Comp. 4	Act. 4.3	Act.4.3_Brochure_DP_Public_Sector	Gundermann	Comp. 4 / Act. 4.3
25	Comp. 4	Act. 4.3	Act.4.3_Legal Guidance Private Sector	Scholz Scheja	Comp. 4 / Act. 4.3
26	Comp. 4	Act. 4.3	Act.4.3_Video Surveillance	Scholz Scheja	Comp. 4 / Act. 4.3
27	Comp. 4	Act. 4.4	Act.4.4_Final Report	Philippi Leopold	Comp. 4 / Act. 4.4
28	Comp. 4	Act. 4.4	Act.4.4_Brochure Social Welfare	Philippi Leopold	Comp. 4 / Act. 4.4

Twinning Project No. LV/2002/IB/OT-01, Final Project Report, 2005-09-29

No.	Comp.	Activity	Name of document	Author	Path on CD
29	Comp. 4	Act. 4.4	Act.4.4_Articles of Directive	Philippi	Comp. 4 / Act. 4.4
30	Comp. 4	Act. 4.4	Act.4.4_Employment Law Analysis	Philippi Leopold	Comp. 4 / Act. 4.4
31	Comp. 4	Act. 4.4	Act.4.4_Leaflets for clients-Social Welfare	Philippi Leopold	Comp. 4 / Act. 4.4
32	Comp. 4	Act. 4.4	Act.4.4_Social Service and Assistance Law Analysis	Philippi Leopold	Comp. 4 / Act. 4.4



Ludwig Boltzmann Institut für Menschenrechte
Mandated Body



DATU VALSTS INSPEKCIJA

This publication has been produced with the assistance of the European Union. The contents of this publication can in no way be taken to reflect the views of the European Union.