

TRAINING AND COMPLIANCE: The role of municipal public servants in effectiveness of the LGPD

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SUMMARY

This article aims to analyze how the training of municipal public servants influences the effectiveness of internal controls related to compliance with the General Data Protection Law (LGPD). The research used a qualitative approach, conducting a multiple case study in two medium-sized Brazilian municipalities, Municipality A and Municipality B. Data collection was conducted through semi-structured interviews with employees from different departments and document analysis of internal regulations. The results showed that Municipality A, which provided formal training, presented better compliance indicators, with the appointment of a data manager, the existence of documented manuals and workflows, as well as a more secure and conscious perception among employees. Municipality B, however, lacked structured training initiatives and demonstrated operational weaknesses, a lack of clear internal policies, and insecurity in data processing. The analysis indicates that training plays a strategic role in internalizing a data protection culture, strengthening internal controls, and mitigating institutional risks. It follows that efforts to comply with the LGPD depend not only on the creation of standards but also on the ongoing training of the teams involved. Municipal administrations are recommended to include ongoing training programs as part of their data governance policies, linking them to regulatory and operational frameworks focused on privacy and information security.

Keywords: LGPD. Training. Public Servants. Internal Controls. Municipal Public Administration.

ABSTRACT

This article aims to analyze how the training of municipal public servants influences the effectiveness of internal controls related to compliance with the General Data Protection Law (LGPD). The research employed a qualitative approach through a multiple case study conducted in two medium-sized Brazilian municipalities, referred to as Municipality A and Municipality B. Data collection was carried out through semi-structured interviews with employees from different departments and documentary analysis of internal regulations. The results showed that Municipality A, which implemented formal training programs, achieved better compliance indicators, including the appointment of a data protection officer, the existence of manuals and documented workflows, as well as a more secure and informed perception among employees. In contrast, Municipality B, which lacked structured training initiatives, exhibited operational weaknesses, unclear internal policies, and uncertainty in information handling. The analysis indicates that training plays a strategic role in fostering a culture of data protection, strengthening internal controls, and mitigating institutional risks. It is concluded that efforts to comply with the LGPD depend not only on the establishment of regulations but also on the continuous qualification of the teams involved. It is recommended that municipal administrations incorporate ongoing training programs as part of their data governance policy, aligning them with normative and operational structures focused on privacy and information security.

Keywords: LGPD. Training. Public Servants. Internal Controls. Municipal Public Administration.

SUMMARY

This article aims to analyze how the capacity of municipal public servants influences the effectiveness of internal controls related to compliance with the General Personal Data Protection Law (LGPD). The investigation adopted a qualitative approach, through a multiple case study carried out in two Brazilian municipalities of medium size, called Municipality A and Municipality B. Data collection was carried out through semi-structured interviews with employees from different areas and documentary analysis of internal regulations. The results showed that Municipality A, which promoted formal training, presented better compliance indicators, with the designation of a data supervisor, the existence of manuals and documented flows, as well as a safer and more conscious perception on the part of servers.

However, Municipality B, without structured training actions, showed operational weaknesses, lack of clear internal policies and insecurity in the handling of information. The analysis shows that capacity plays a strategic role in the internalization of the data protection culture, in the strengthening of internal controls and in the mitigation of institutional risks. It is concluded that LGPD compliance efforts depend not only on the creation of standards, but also on the continuing qualification of the involved equipment. It is recommended that municipal administrations include permanent training programs as part of their data governance policy, linking them to normative and operational structures oriented to privacy and information security.

Keywords: LGPD. Capacity. Public Servants. Internal Controls. Municipal Public Administration.

1. INTRODUCTION

The increasing digitalization of administrative processes in the Brazilian public sector has driven profound transformations in the way personal data is processed and protected. The emergence of information technologies, combined with the expansion of governance digital, requires public administrations to adopt more transparent, secure and compatible with the fundamental rights of citizens. In this context, the General Law of Personal Data Protection (Law No. 13,709/2018), known as LGPD, represents a milestone highly relevant regulation, establishing guidelines for the processing of personal data by public and private entities.

Although the LGPD was enacted in 2018 and has been in force since 2020, many municipalities still face significant difficulties in its effective implementation. The budgetary limitations, the lack of technological infrastructure and, mainly, the absence of qualified servers to deal with the challenges imposed by legislation are obstacles recurring in the municipal scenario. In this sense, the training of public servants assumes strategic role, functioning as a link between normative requirements and administrative practice.

Several studies have shown that institutional compliance with the LGPD depends not only the creation of internal regulations, but above all the continuous training of teams involved in information management. The qualification of servers allows the internalization of data protection principles, recognition of the risks associated with improper processing of information and the construction of an organizational culture focused on privacy and ethics in public administration.

Considering this panorama, this article aims to analyze the influence of training of municipal public servants in the effectiveness of internal controls aimed at compliance with the LGPD. To this end, a multiple case study was carried out in two medium-sized Brazilian municipalities, referred to in this work as Municipality A and Municipality B. The methodological approach used was qualitative, with the application of interviews semi-structured interviews and documentary analysis. The choice of this methodology aimed to understand the institutional dynamics and the perceptions of the employees themselves about the relationship between training and administrative practices compatible with the LGPD.

The relevance of this study lies in the need to understand the factors conditions for the implementation of the LGPD at the local level, contributing to the debate on the professionalization of public management, strengthening internal controls and promoting information security in the public sector. Furthermore, the results obtained can support practical recommendations for municipal administrations seeking to structure policies data protection more effectively and sustainably.

The article is organized into five sections, in addition to this introduction. The second section presents the methodological procedures used. The third section presents the review of literature on the main concepts that underpin the study: LGPD, internal controls and training. In the fourth section, the empirical results obtained in the municipalities analyzed. The fifth section presents the final considerations, highlighting the main findings, limitations of the study and suggestions for future research.

2. METHODOLOGY

This research was conducted using a qualitative approach, of a applied, with an exploratory and descriptive objective. The case study method was chosen multiple, which allowed an in-depth analysis of two distinct institutional contexts – referred to in this work as Municipality A and Municipality B. This methodological strategy made it possible to compare administrative practices related to compliance with the LGPD, with specific focus on staff training and the existence of internal controls.

The choice of the municipalities analyzed was intentional, considering criteria such as accessibility to information, institutional disposition for cooperation, administrative structure comparable and relevance of the topic to the local reality. Both are medium-sized municipalities located in different states, with a similar socioeconomic profile, although they present different levels of institutional maturity regarding the application of the LGPD.

Data collection was carried out through semi-structured interviews and analysis documentary. The interviews were conducted with 12 civil servants, six from each municipality, distributed among managers, information technology professionals, technicians administrative staff and members of committees or internal groups related to data protection. The interview script was prepared based on the research objectives and covered topics such as knowledge about the LGPD, institutional training practices, perception about risks, existence of internal regulations and functioning of control mechanisms.

The documents analyzed included municipal decrees, ordinances, and manuals procedures, internal reports, process flowcharts and training materials made available by municipal agencies. The triangulation between the data obtained through the interviews and the documentation consulted ensured greater reliability to the analyses and allowed verify the coherence between the interviewees' discourse and the institutional practices actually implemented.

For data analysis, the thematic analysis method was used, as proposed by Bardin (2016), which allows the identification of recurring patterns of meaning in speeches of the interviewees and in the documentation examined. The categories of analysis were defined previously based on the reviewed literature: (i) institutional capacity; (ii) controls internal; (iii) perception of compliance; and (iv) organizational culture.

The ethical aspects of the research were fully respected. All participants were informed about the objectives of the study, ensuring the anonymity of their identities and the confidentiality of shared information. Participation was voluntary and formally authorized by municipal administrations.

This methodology was chosen because it allows for a more comprehensive understanding and contextualized analysis of the factors that influence the effectiveness of the LGPD in public environments locations, considering the operational and cultural specificities of each institution.

3. THEORETICAL FRAMEWORK

Building a consistent theoretical framework is essential for understanding in-depth analysis of the factors that influence the effectiveness of the General Data Protection Law

(LGPD) within the scope of municipal administrations. According to Gil (2010), the literature review allows the researcher to situate the research problem in the context of existing knowledge produced, facilitating the identification of gaps and the formulation of well-founded hypotheses. In this study, the theoretical review is organized into six thematic axes that are articulated to support the empirical analysis developed.

Initially, a normative and institutional contextualization of the LGPD will be presented and its application in municipal spheres, considering the operational challenges faced by local entities in implementing legislation (Cunha, 2020). Next, the concept is explored of internal controls in light of the COSO model and international security standards information, with emphasis on ISO/IEC 27002:2022, highlighted by authors such as Silva and Andrade (2021) as fundamental for compliance in institutional environments.

The third theoretical axis deals with the training of civil servants as an institutional strategy to mitigate risks and ensure the effectiveness of the LGPD. Studies such as those by Meireles (2020) and Lima and Barros (2023) demonstrate the correlation between training and performance in identifying of vulnerabilities and the adoption of good data protection practices.

Next, empirical research carried out in different contexts is examined. municipal, with the aim of comparing initiatives and extracting evidence on critical factors for the implementation of the LGPD in local administrations (Costa; Silva, 2022; Rodrigues et al., 2021). Finally, the review concludes with a theoretical synthesis that articulates the main concepts analyzed, providing the basis for interpreting empirical data and for discussions later.

Next, each of these axes will be explored in greater depth, establishing the conceptual foundations necessary to understand the problem investigated and justifying the methodological choices of the present study.

3.1 LGPD and Municipal Public Administration

The General Personal Data Protection Law (Law No. 13,709/2018), enacted in August 2018 and in force since 2020, constitutes a fundamental regulatory framework for ensure the privacy and security of personal information in Brazil. Inspired by international regulations such as the European Union's General Data Protection Regulation (GDPR) European, the LGPD establishes the principles, rights and duties related to the processing of personal data by public and private organizations (BRAZIL, 2018).

In the public sector, the application of the LGPD represents an even greater challenge, given the heterogeneity of administrative structures and the limitation of human resources and

technological, especially in municipal administrations. According to Cunha (2020), Brazilian municipalities face structural difficulties in adapting to legislation, including the absence of internal regulations, the lack of trained employees and the lack of organizational policies aimed at data governance.

The mandatory legal compliance imposed by the LGPD requires public entities the adoption of technical and administrative measures capable of protecting the data in its custody. Article 23 of the aforementioned law highlights that the processing of data by public authorities must observe the principles of purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination and accountability (BRASIL, 2018). To this end, legislation requires the appointment of a data protection officer (Data Protection Officer – DPO), the preparation of reports on the impact on personal data protection (RIPD) and the adoption of practices that guarantee the rights of holders.

At the municipal level, however, many of these devices have not yet been fully implemented. internalized. In a study carried out by Albuquerque (2025), it was found that most of the medium-sized municipalities analyzed had not formally appointed a person in charge of data, nor established commissions or technical structures aimed at compliance with the LGPD. The author highlights that, without a minimum of institutionalization, the risk of non-compliance of the norm and legal accountability increases significantly.

Furthermore, the organizational culture of municipalities often makes it difficult to implementation of the law. According to Rodrigues et al. (2021), there is a predominance of practices informal in information management, with little appreciation for data security and resistance to administrative changes. This reflects a historical gap in Brazilian public management, where topics such as privacy, digital ethics and data governance still occupy a secondary position in local political and administrative agendas.

In this scenario, it becomes evident that the effectiveness of the LGPD depends on the capacity institutional structure of municipalities, which includes not only normative and technological structure, but, above all, the technical training of public servants. The lack of specific training compromises not only compliance with legal requirements, but also credibility institutional and citizen trust in public management. Thus, understanding how training contributes to the effectiveness of internal controls and is essential to advance in consolidation of a more transparent, ethical and efficient public administration.

3.2 Internal Controls and Information Governance

Internal controls are fundamental instruments to ensure compliance, operational efficiency and accountability in public organizations. In the context of the Law General Data Protection Regulation (LGPD), its importance is even more pronounced, since since the proper handling of information requires continuous monitoring mechanisms, standardization of procedures and risk mitigation. According to the Committee of Sponsoring Organizations of the Treadway Commission (COSO), internal controls comprise a structured process, developed by management and other employees, with the objective to ensure the achievement of organizational objectives in three main categories: operations, reporting and compliance (COSO, 2013).

The COSO model, widely used in public management, is made up of five integrated components: control environment, risk assessment, control activities, information and communication, and monitoring. In the context of the LGPD, these elements allow structuring information governance oriented towards data protection personal, integrating legal principles into daily administrative practices. As points out Ribeiro (2021), the absence of a minimum internal control structure in the bodies public is one of the main causes of institutional fragility in the face of protection legislation of data.

Complementing COSO, the ISO/IEC 27002:2022 standard establishes guidelines for the implementation of information security controls. This standard provides a set comprehensive set of technical and administrative measures aimed at confidentiality, integrity and availability of information, being an international reference for organizations that wish to establish robust security policies. Albuquerque (2025), when analyzing the reality of Brazilian municipalities, identified that the lack of formal policies of digital security is directly related to the low effectiveness of internal controls and the legal vulnerability.

In this context, the concept of information governance emerges as a dimension essential for the alignment between the legal requirements of the LGPD and public management. The information governance involves defining responsibilities, policies, standards, processes and technologies to ensure the appropriate, safe and ethical use of data (Lima and Barros, 2023). This is a systemic and continuous process, which requires the involvement of leaders institutional, coordination between sectors and ongoing training of teams.

Wanderbilt Barros (2025), in a study focused on the public health sector, demonstrated that the adoption of formal digital security protocols, when integrated into a system of

efficient internal control, contributes significantly to the protection of privacy of users and to strengthen institutional transparency. Miranda (2025) also highlights that the integration of international frameworks, such as the NIST Cybersecurity Framework, strengthens organizational maturity in information security.

Thus, the relationship between internal controls and information governance is intrinsic and strategic. Compliance with the LGPD, especially in the municipal public sector, requires not only the formal compliance with legal provisions, but the institutionalization of a culture organizational culture focused on data protection. This culture can only be developed through consistent regulatory frameworks, effective control mechanisms and training policies continuous.

3.3 Training as a Compliance Instrument

The training of public servants constitutes a strategic pillar in the implementation of General Personal Data Protection Law (LGPD), especially in the municipal context, where limitations in technical personnel, infrastructure and organizational culture focused on to the protection of information. The implementation of the LGPD requires not only regulatory compliance of institutions, but the transformation of administrative practices, which demands technical knowledge, operational skills and ethical commitment of public agents.

According to Chiavenato (2014), training in the public sector must be understood as a continuous process of developing the skills of servers, involving the learning of technical content, the internalization of values institutional and improving the quality of services provided to the population. In the case of the LGPD, this training should cover topics such as data protection principles, recognition of sensitive data, preparation of impact reports, communication with holders and the adoption of preventive measures against security incidents.

Empirical studies have confirmed the correlation between training and legal compliance. Lima and Barros (2023), when analyzing the application of the LGPD in medium-sized municipalities, identified that the presence of systematic training is directly related to the existence safer institutional practices and greater engagement of employees with standards data protection. In contrast, organizations that have not invested in training face difficulties in implementing adequate flows and ensuring accountability for their teams.

At Must University, several Final Conclusion Projects reinforce this perspective. Barros (2025) showed that the adoption of training strategies in public institutions



health has increased the effectiveness of digital security measures and reduced the occurrence of failures operational. Ferri (2024), in turn, highlights that the perception of an organizational environment welcoming and safe is directly related to the provision of regular training, which promote greater well-being, engagement and responsibility on the part of employees.

Brazilian legislation also recognizes the centrality of training. Decree No. 10.046/2019, when dealing with data governance in the federal public sector, mentions explicitly the training of servers as one of the principles of good information management. Although the decree has restricted application to the federal administration, it serves as a reference for states and municipalities, and its replication has been advocated by authors such as Meireles (2020), which associates the effectiveness of governance with the maturity of technical teams.

Daniele Pereira (2025), when analyzing the implementation of the LGPD in a body of the indirect administration, noted that the lack of training was one of the main factors of institutional resistance and delay in complying with legal requirements. According to the author, the misinformation creates insecurity, fear and, ultimately, blocks innovation organizational.

Therefore, training cannot be treated as a secondary or accessory measure, but as a strategic and structuring policy. It is through training that civil servants understand the legal foundations of the LGPD, recognize their responsibility in the cycle of given and become able to adopt safe and compliant practices. In the municipal environment, where resources are scarce and staff turnover is high, investing in ongoing training is a guarantee the sustainability of information governance.

3.4 Similar Research and Recent Studies

In recent years, the number of studies dedicated to understanding how General Personal Data Protection Law (LGPD) has been implemented in administrations Brazilian public institutions, especially at the municipal level. This expansion of scientific interest reflects the concrete challenge faced by municipalities in adapting to a legal framework complex, technical and with strong institutional implications.

Costa and Silva (2022) conducted research in three municipalities in southern Brazil and found that, although everyone was aware of the obligations of the LGPD, only one had a structured adaptation process was initiated. The authors highlighted that the existence of trained servers and coordination between administrative sectors were determining factors to advance the compliance process.

Rodrigues et al. (2021) focused on the relationship between organizational culture and compliance with the LGPD, pointing out that institutional values such as responsibility, ethics and transparency contribute to a more effective implementation of legislation. On the other hand, environments marked by resistance to change and the absence of committed leadership tend to postpone or neglect legal requirements.

At Must University, several Final Conclusion Papers have also addressed the thematic. Leonardo Miranda's study (2025) investigated the use of NIST Cybersecurity Framework as a tool to support the training of public servants. Although the focus is not was exclusively the LGPD, the findings indicated that servers trained based on in consolidated frameworks demonstrated greater preparation to deal with digital threats and with the structuring of information security policies.

Another relevant example is the work of Daniele Pereira (2025), who analyzed the challenges faced by an indirect administrative body to implement the LGPD. The author highlighted the absence of formal training policies as a central obstacle, noting that the lack of technical knowledge directly impacted the preparation of impact reports, the classification of sensitive data and response to security incidents.

Wagner de Castro Albuquerque (2025) also contributed evidence significant in demonstrating, in their research focusing on municipal internal controls, that servers who had received training on data protection had higher clarity regarding their attributions and greater initiative in proposing institutional measures to accordance.

These studies converge in pointing out that the technical training of civil servants is one of the main differences between administrations that managed to advance in the implementation of the LGPD and those that remain stagnant or disorganized. Furthermore, they suggest that existence of effective internal controls, the definition of those responsible and the formalization of processes are aspects directly related to team formation.

Given this evidence, the present research is part of an empirical field that is still in consolidation, contributing to the understanding of local dynamics that facilitate or make compliance with the LGPD difficult. The analysis of the cases of Municipalities A and B, presented in the following section, it discusses these studies and seeks to broaden our understanding of the effects concrete results of training in data protection management in the public sector.

3.5 Theoretical Synthesis

The literature review carried out in this study allows us to consolidate a set of essential understandings about the factors that condition the effectiveness of the LGPD in municipal public administrations. Analysis of legal frameworks and control references internal, empirical evidence and academic contributions provides a solid basis for the discussion of research results and the formulation of practical recommendations.

Firstly, it is observed that compliance with the LGPD is a challenge multifaceted, which involves not only formal compliance with legal requirements, but also building an institutional culture focused on data protection. As demonstrated by Cunha (2020) and Albuquerque (2025), the absence of structured policies, the non-existence of capable leaders and the fragmentation of responsibilities contribute to the legal and operational vulnerability of municipalities.

The application of internal control models, such as COSO and ISO/IEC 27002:2022, emerges as an effective alternative to structure data protection processes in a way systemic. These models offer guidelines and instruments that enable greater predictability, security and transparency in administrative routines, contributing to the information governance in complex institutional environments.

The training of civil servants, in turn, appears as a critical variable. Work such as Lima and Barros (2023), Barros (2025), Trovão Rodrigues (2024) and Ferri (2024) demonstrate that technical qualifications directly influence the engagement of employees, effectiveness of practices and the sustainability of compliance actions. When agents public understand the legal foundations, recognize their responsibility in the cycle of given and master the operational tools, compliance with the LGPD becomes more viable and consistent.

Furthermore, empirical literature reveals that municipalities that promoted actions formative managed to advance in the structuring of internal controls, in the appointment of those in charge, in the development of internal regulations and in risk reduction. The experience of these municipalities reinforces the hypothesis that training is not only desirable, but necessary to that the LGPD is effectively implemented.

The articulation between the concepts analyzed indicates that the protection of personal data requires an integrated approach, involving governance, control, training and culture. The next chapter of this study presents the empirical findings resulting from the application of these references in two distinct contexts, allowing a critical analysis of the municipal reality in light of the theoretical evidence summarized here.

4. RESULTS AND DISCUSSION

This chapter presents and analyzes the empirical results obtained through the interviews and documentary analysis carried out in Municipalities A and B. The data collected are discussed in light of the reviewed literature, allowing to verify the correspondence between the theoretical references and the observed institutional reality.

The structure of the chapter follows a logic of analytical progression, starting with the characterization of the municipal contexts studied, followed by the description of the profile of the interviewees. Next, institutional training practices and the internal control mechanisms implemented in each municipality.

The following section presents a comparative table between the two cases, highlighting the most relevant contrasts. Finally, a critical discussion of the findings is promoted, relating them to the theoretical contributions discussed in previous chapters.

4.1 Characterization of the Cases Studied

The research was carried out in two medium-sized Brazilian municipalities, here called Municipality A and Municipality B, both with socioeconomic characteristics similar, but with different levels of institutional maturity regarding the implementation of LGPD. Municipality A has structured information technology departments, people management and legal sector, which allows for greater functional specialization and division of responsibilities. This municipality also demonstrates openness to administrative innovation and modernization of its internal processes.

In turn, Municipality B has a leaner structure, with administrative areas overlapping and accumulation of functions between servers, which makes specialization and adoption difficult of new compliance practices. Furthermore, no relevant initiatives were identified of modernization or investment in information governance.

The choice of these municipalities allowed us to compare how different levels of capacity institutional influence the application of the LGPD. The information collected revealed different forms of internal organization, available to face the challenges imposed by legislation. This initial characterization was essential to contextualize the other research findings.

4.2 Interviewee Profile

Twelve civil servants were interviewed, six from each municipality, with diverse backgrounds and working in strategic sectors such as administration, planning, IT, legal sector and management



documentary. The selection criteria considered the functional proximity of the interviewees with personal data processing flows and the ability to provide relevant information on the adoption (or not) of compliance mechanisms.

Most participants have more than five years of service and hold positions effective, which contributed to the reliability of the responses. Municipal Employees demonstrated greater familiarity with the concepts of the LGPD, while those from Municipality B showed less understanding and security regarding the application of the law in their routines.

This distinction in the knowledge profile of the interviewees revealed the importance of training as an instrument of institutional alignment. The responses also indicated divergent perceptions about the risks and legal responsibilities associated with treatment of data.

4.3 Staff Training

In Municipality A, the existence of a formal training program was found on LGPD, developed in partnership with external institutions. The training included legal aspects of the law, information security, and data protection practices. Servers reported having participated in workshops, online courses and seminars promoted by entities regional associations. As a result, there was an increase in understanding of the concepts of legislation and greater confidence in its application in administrative routines.

In Municipality B, on the other hand, no structured actions were identified. training. Respondents reported having received only generic informational materials, without in-depth. The lack of training directly compromised the understanding of processing flows, legal obligations and data subjects' rights.

The evidence reinforces that systematic training is a determining factor for application of the LGPD. In the contexts analyzed, the training of civil servants resulted in practical differences for complying with legal requirements.

4.4 Internal Controls and Compliance Practices

Municipality A presented positive indicators in the structuring of internal controls. There is internal normative documentation, defined procedural flows, formal appointment of data controller and the existence of a LGPD monitoring committee. These structures contribute to standardizing routines, preventing errors and ensuring greater legal security.

In Municipality B, the reality is different. No official documents were identified that regulate the processing of personal data. Nor is there a formal designation of

responsibilities or a committee to monitor the issue. The absence of protocols generates improvisation in administrative routines and exposes the municipality to institutional risks.

The interviews also revealed differences in the perception of the servers. While the Municipality A report security and clarity regarding legal responsibilities, those of Municipality B demonstrated ignorance and fear about the consequences of a possible non-compliance with the LGPD.

Comparative Table between the Cases Studied

Evaluated Dimension	Municipality A	Municipality B
Training of the Servers	Formal, with courses on LGPD, security information and good practices.	Non-existent or informal, with specific guidelines.
Appointment Person in Charge (DPO)	Formally appointed by order.	Absent.
Documentation of Processes	Exists: manuals, flows and internal regulations.	Non-existent.
Commission Follow-up	Created and active.	Non-existent.
Servers' Perception of Institutional Engagement	Security, clarity about responsibilities and Institutional Engagement.	Insecurity, doubts and low adherence to legal requirements.
Effectiveness of Controls	High, with preventive measures and standardization of routines.	Low, with high risk of not accordance.

The findings demonstrate that there is a direct relationship between the training of employees and the effectiveness of internal control mechanisms. Municipality A, with technical training and institutional organization, presented a structure and culture favorable to compliance. In contrast, Municipality B showed operational weaknesses and legal risks, attributable to lack of training and planning.

These results are in line with reviewed studies (Lima and Barros, 2023; Albuquerque, 2025), who point to training as a critical factor for internalizing LGPD. They also reinforce the need for ongoing investment in training and standardization of institutional flows.

The analysis of the two contexts shows that, even with structural limitations, the existence of institutional training and leadership can promote significant changes and enable the effectiveness of the controls required by the LGPD.

FINAL CONSIDERATIONS

This study had as its main objective to analyze the influence of the training of municipal public servants in the effectiveness of internal controls aimed at compliance with the General Personal Data Protection Law (LGPD). Based on an approach qualitative and guided by multiple case study, the research explored comparatively the reality of two medium-sized Brazilian municipalities, allowing us to identify patterns, contrasts and determining factors for the effective application of legislation.

The empirical findings revealed that the existence of formal and systematic actions of training is directly associated with the institutional maturity of public administrations regarding data protection. Municipality A, which provided specific training on LGPD, demonstrated to have organized normative mechanisms, procedures documented, servers more aware of their responsibilities and governance structure more solid. On the other hand, Municipality B, which did not invest in training, presented significant operational weaknesses, lack of internal regulations and lack of knowledge of legal principles by its public agents.

This empirical finding validates the theoretical hypothesis of this work: the training of servers is a sine qua non condition for the effectiveness of the internal controls required by LGPD. In addition to promoting technical knowledge, continuing education fosters a culture organizational structure focused on ethics, transparency and responsible management of personal data under the guardianship of the State.

It is important to recognize, however, the limitations of this research, especially with regard to refers to the reduced number of cases analyzed and the use of predominantly data qualitative, which limits the generalization of the results. For future research, it is recommended expand the universe of analysis, including municipalities from different regions and profiles administrative, as well as employing complementary methods, such as document analysis longitudinal and perception research with larger sampling.

From a practical point of view, the results presented here highlight the urgency of public policies aimed at training municipal employees, institutionalizing internal controls and the valorization of information governance. Such measures should not be understood as specific responses to current legislation, but as part of a strategy broader modernization and professionalization of public management.

It is therefore concluded that the effectiveness of the LGPD in Brazilian municipalities depends on necessarily through the qualification of public agents, through the formalization of processes institutional and strengthening an administrative culture committed to the fundamental rights of citizens. Investing in training is investing in citizenship, security legal and in the consolidation of a State that respects privacy, promotes transparency and ensures society's trust in its institutions.

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