



Understanding the ICO's relationships with SMEs

Research findings

April 2021



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Background



With 90% of businesses in the UK being classed as a Small or Medium Enterprise (SME), it is imperative that the Information Commissioner's Office (ICO) has a strong relationship with them.

As part of its Service Excellence programme, the ICO has set up a SME Service Hub to provide a more joined-up service for these businesses, including educating and supporting them in relation to data protection (DP) compliance.

However, despite campaigns, only a minority of SMEs are registered with the ICO, indicating there may be insufficient knowledge about data protection obligations.

The ICO has commissioned baseline market research to help improve its market understanding.

Objective & methodology

The **main aim** of this research is:

To better understand the motivations and barriers for registration and data protection compliance, and identify how and where the ICO should target its communications.

In more detail:

- Understand the current view of/relationship with the ICO.
- Establish how SMEs perceive DP legislation.
- Identify the motivations/barriers towards DP compliance.
- Identify how and where future communications should be targeted.
- Test specific communications that the ICO could use.



208 x 10 minute online interviews
156 amongst SMEs with 0-9 employees
52 amongst SMEs with 10-49 employees



6 x 45 minute in-depth discussions via Teams
3 amongst SMEs with 0-9 employees
3 amongst SMEs with 10-49 employees



Participants met the following criteria:

- Business leader (not a DPO)
- Do not pay the DP fee
- Are not exempt from paying the fee.



Online survey: February 25th – March 4th 2021
Qualitative discussions: March 8th & 11th 2021
This research took place during the COVID-19 lockdown.

Executive Summary

1

A majority of SMEs who are not registered are not familiar with the ICO or how it can help small businesses. This is particularly true of micro SMEs.

2

DP/GDPR is often seen as not relevant to SMEs' businesses, particularly so micro businesses. More SMEs are unconfident in their understanding of its implications on their businesses than are confident. It is more likely to be seen as something that is relevant to larger businesses and customers – focusing on the customer will resonate for some, as will addressing specific barriers.

3

Only a minority are aware of the need to register and pay the DP fee, and even then don't always consider registering with the ICO. Reasons vary, but key is that many think the fee is for larger organisations or don't clearly understand what constitutes 'personal information'. Yet many businesses want to get DP/GDPR right, more so the larger SMEs. Creating greater awareness of not only the requirements but also the benefits will therefore be key.

4

Internet searching will remain key, but more trusted channels for information on DP/GDPR are accountants, trade associations and specialist consultants to help increase awareness and engagement. The ICO website would also be trusted, but is less frequently used due to low awareness. Emailed guides/updates direct from the ICO (within PECR requirements) will help engagement.

5

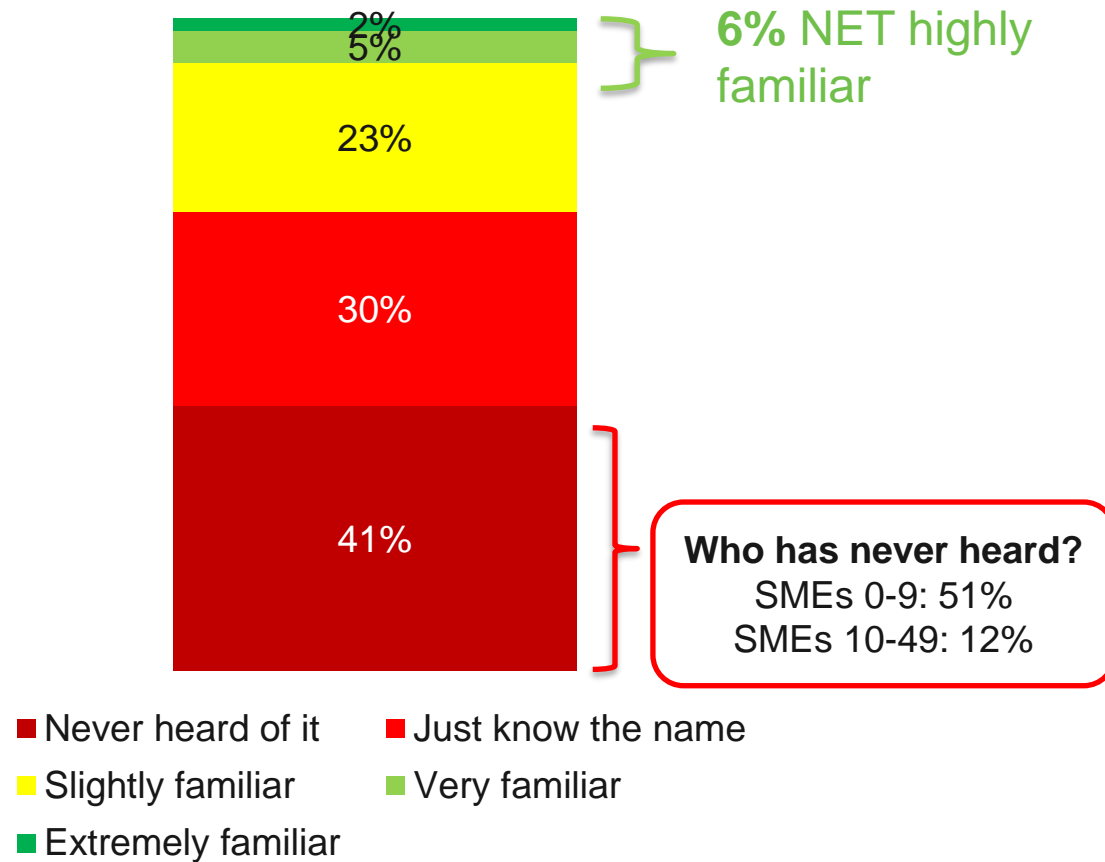
Of the messages tested, those addressing a lack of recognition and skill/ownership are deemed most relevant, particularly "GDPR is everyone's responsibility". However, there was no clear winner in terms of increasing the likelihood of paying the DP fee. A degree of 'stick' is important (i.e. fines) to prioritise attention, combined with clear information on potential benefits ('carrot'). Messages targeted directly at SMEs, delivered in an open and helpful manner are most likely to encourage SME's to visit the ICO website.



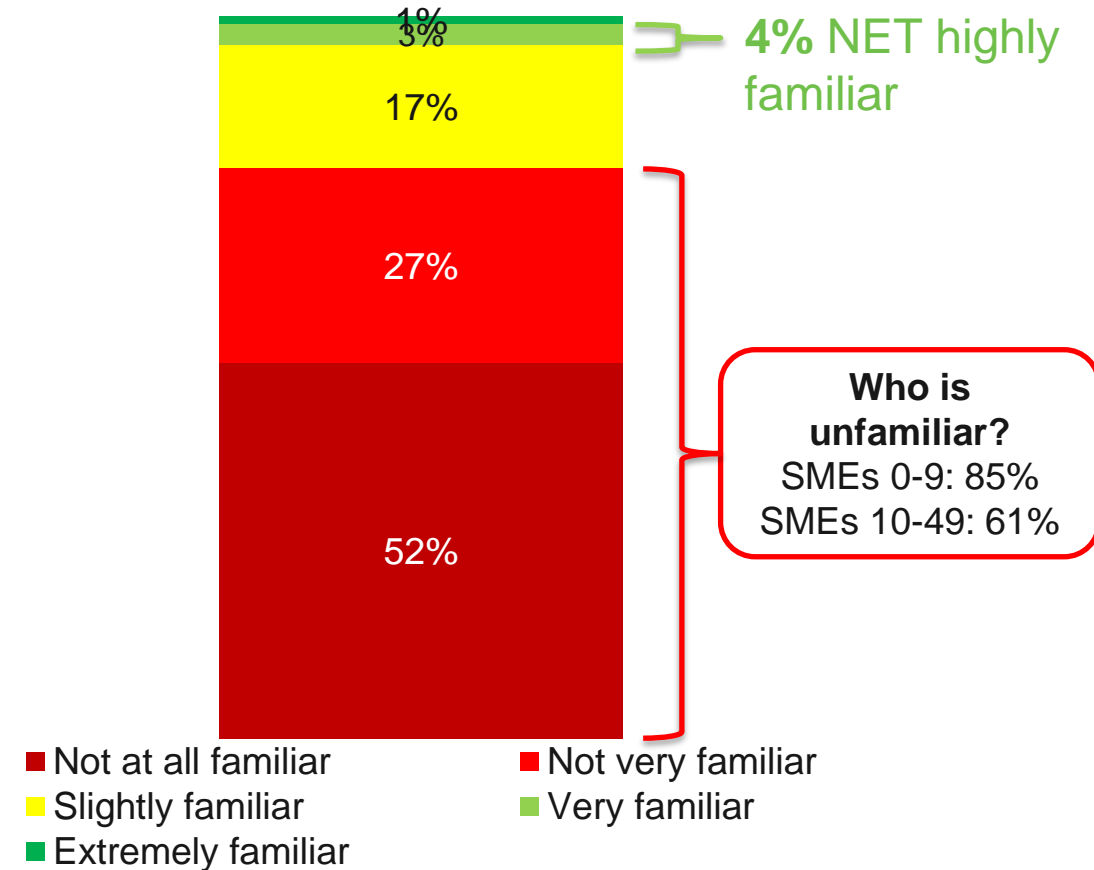
Key finding 1: **Perceptions of the ICO**

Only three in ten SMEs are familiar with the ICO, and even fewer are familiar with how the ICO can help small businesses. Micro SMEs are less likely to be familiar than larger SMEs.

To what extent are you familiar with the ICO?



To what extent are you familiar with how the ICO can help small businesses?



Perceptions of the ICO pre- and post- interview: better understanding of what the ICO is and feel far more positive about their supportive role

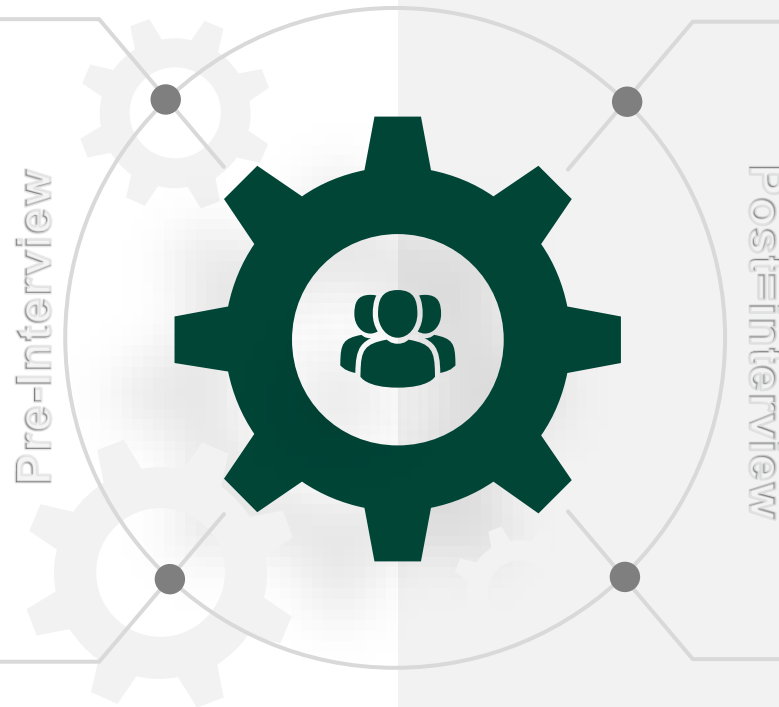
Inclination to Google ICO prior to interview

- Website itself not easy to follow for a 'first timer' who has no idea who or what the ICO is: am I in the right place?

>> separate links / sites for organisations and individuals would help

Received letter from ICO suggesting should consider registration

- Unsure if this is legitimate? Or a scam? Who are the ICO?



*“Small businesses are **overlooked** at times – ICO is a trusted company and it’s good to know you’ve got **help and back up**”*

Perception that ICO far more supportive than imagined

*“It’s opened my eyes to ICO – I wasn’t previously aware of them. I will look and see if I should be doing this, if it would be **beneficial** to mention to a new client – to make them aware **I’m registered with the ICO**”*

*“It’s **reassuring** that ICO are trying to be more involving – support more”*

Able and willing to help any organisation

*“I feel **more positive** about ICO – they are there to advise and support people more”*

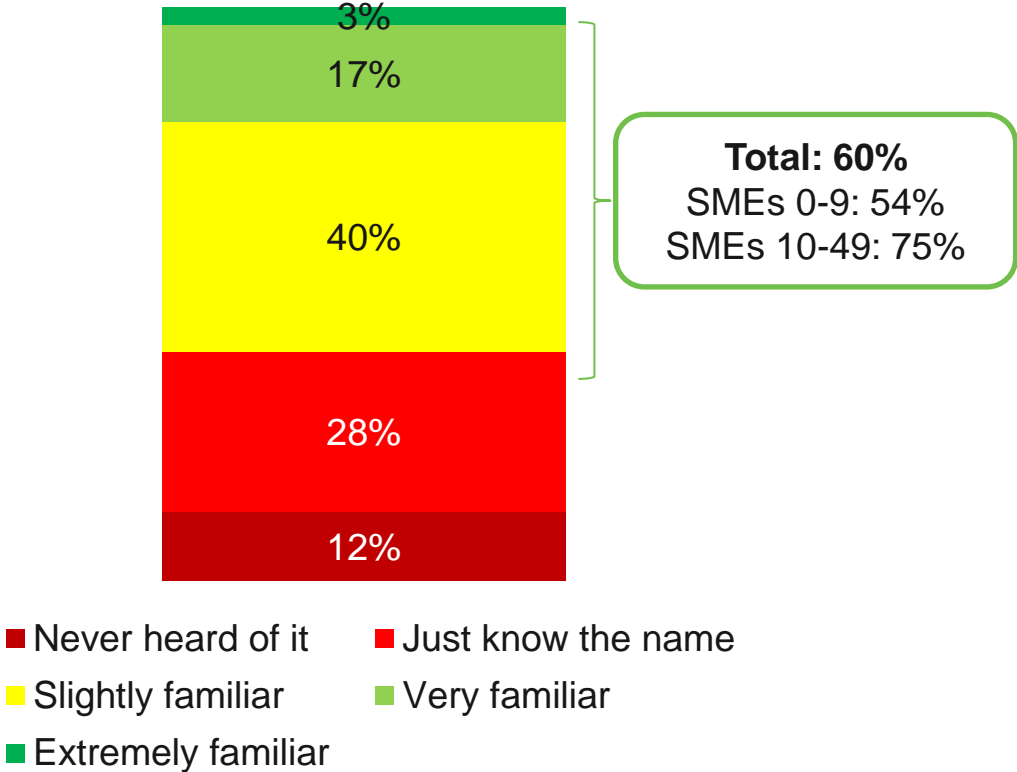


Key finding 2:

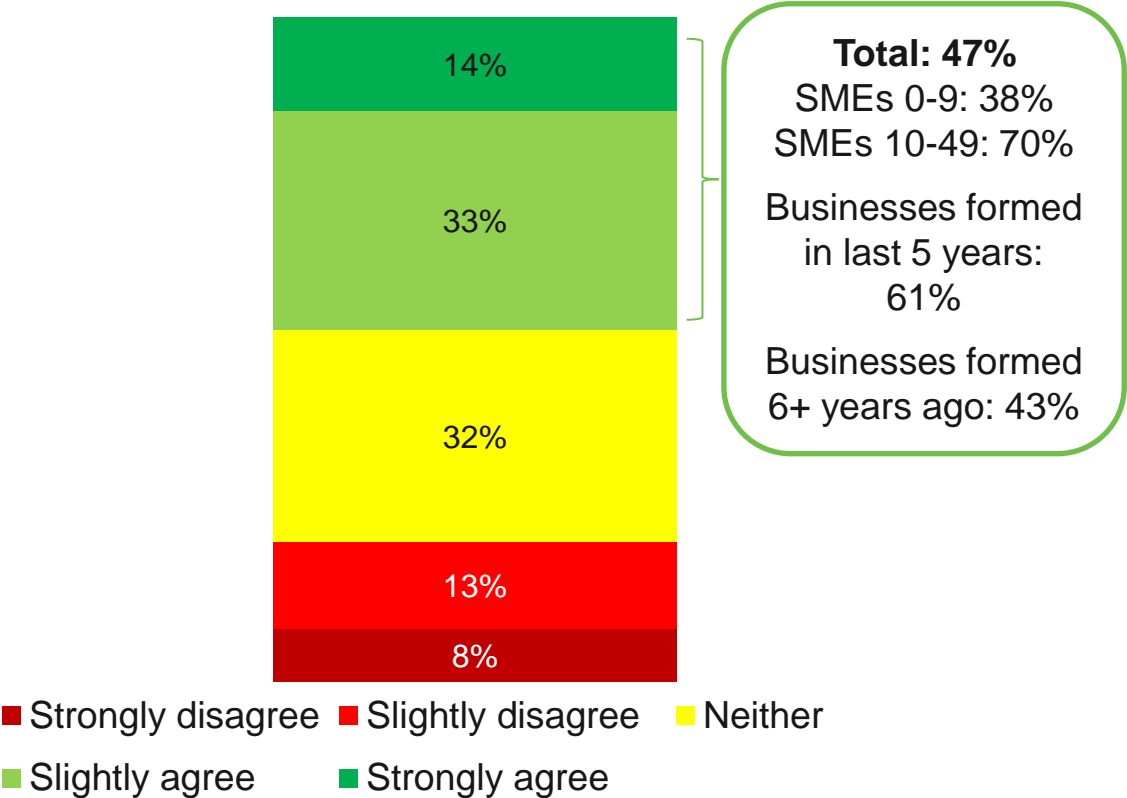
Understanding and perceptions of DP/GDPR

Three in five SMEs have some familiarity with DP/GDPR. Amongst those who have heard of it, fewer than half agree that they understand its implications for their business.

To what extent are you familiar with data protection/the UK GDPR (UK General Data Protection Regulation)?



To what extent do you disagree or agree that you understand data protection/GDPR and its implications for your business?

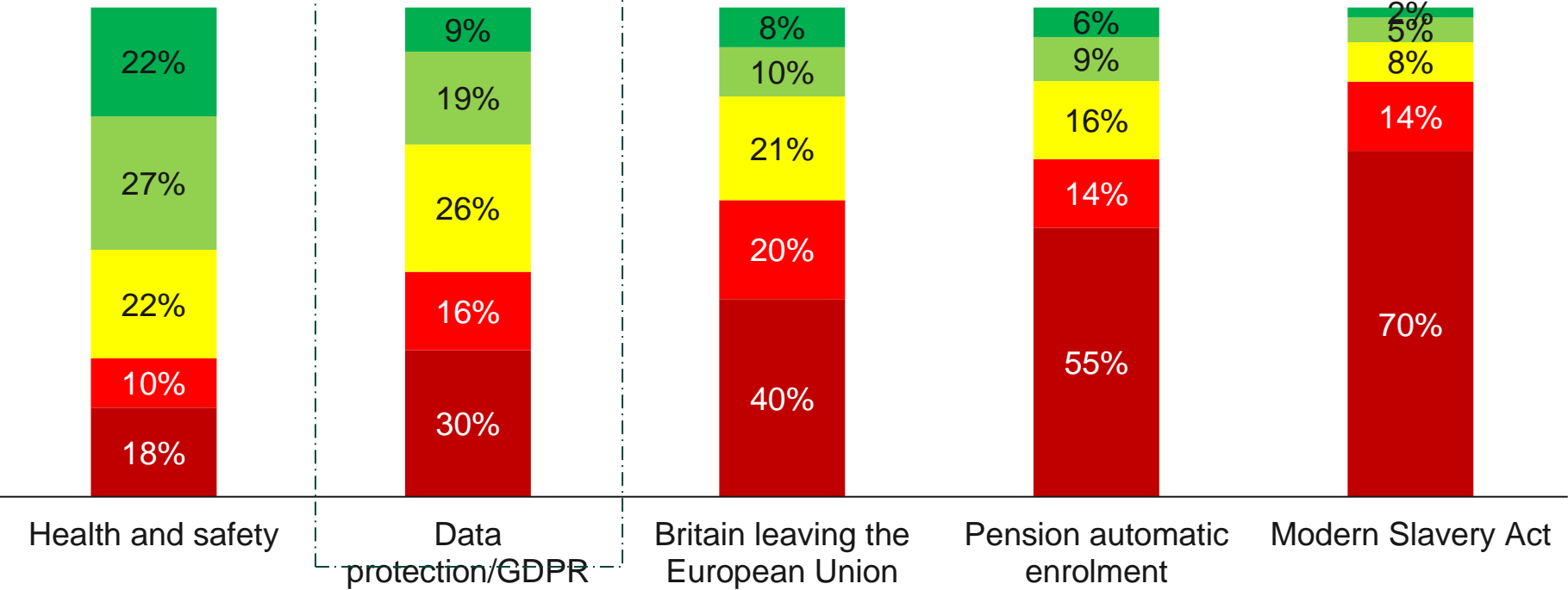


DP/GDPR is deemed less relevant than health & safety but more relevant than Brexit, automatic enrolment and the Modern Slavery Act. Almost half see it as not relevant. Larger SMEs are three times more likely to consider it relevant than micro SMEs.

NET highly relevant

How relevant are the following for your business?

Total	49%	28%	18%	15%	7%
SMEs 0-9	41%	18%	15%	7%	6%
SMEs 10-49	76%	58%	27%	39%	12%

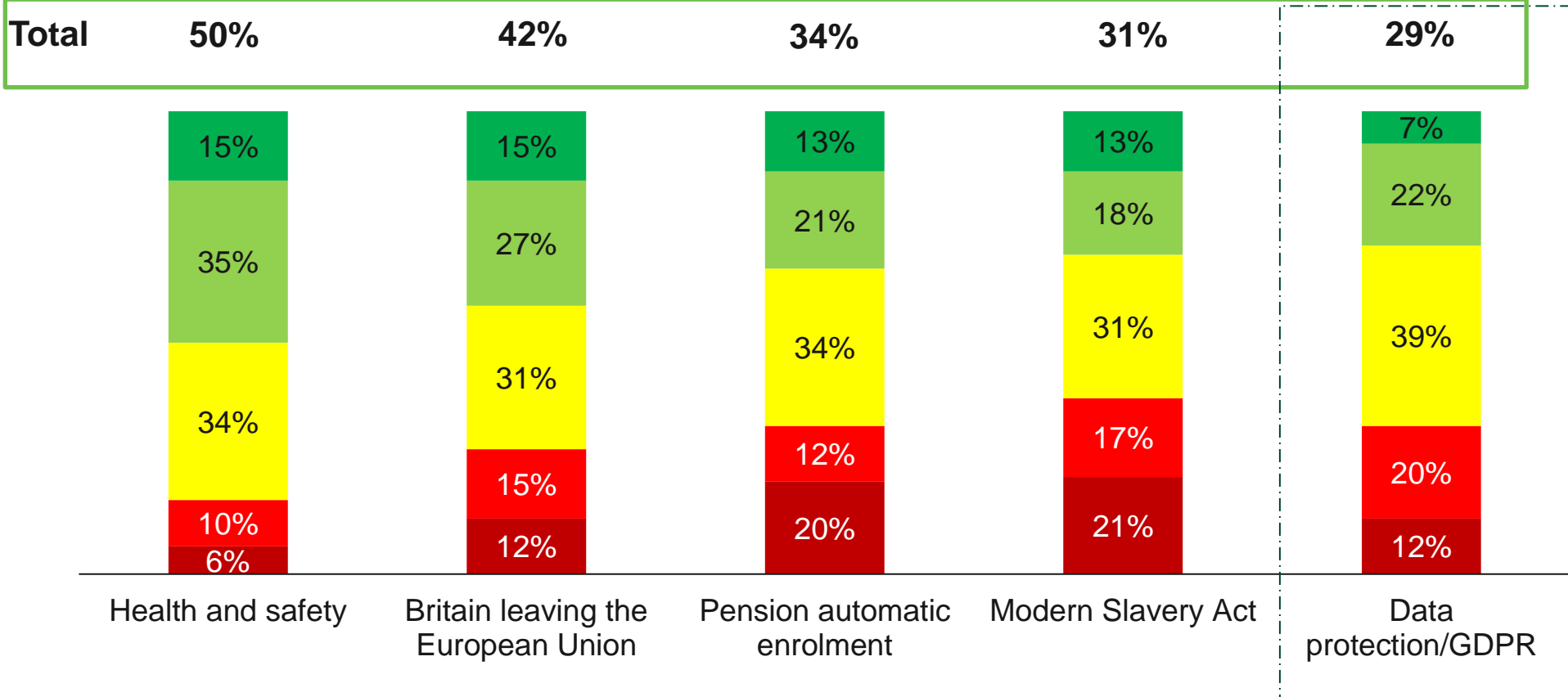


■ Not at all relevant ■ Not very relevant ■ Somewhat relevant ■ Very relevant ■ Extremely relevant

SMEs are less confident in understanding the implications of DP/GDPR on their business than the other regulatory areas. More are unconfident than are confident.

How confident do you feel in understanding the implications of the following on your business?

NET highly confident



% NET highly confident

0-9 employees
 Health & Safety: 47%
 DP/GDPR: 26%

10-49 employees
 Health & Safety: 58%
 DP/GDPR: 39%

% NET highly confident

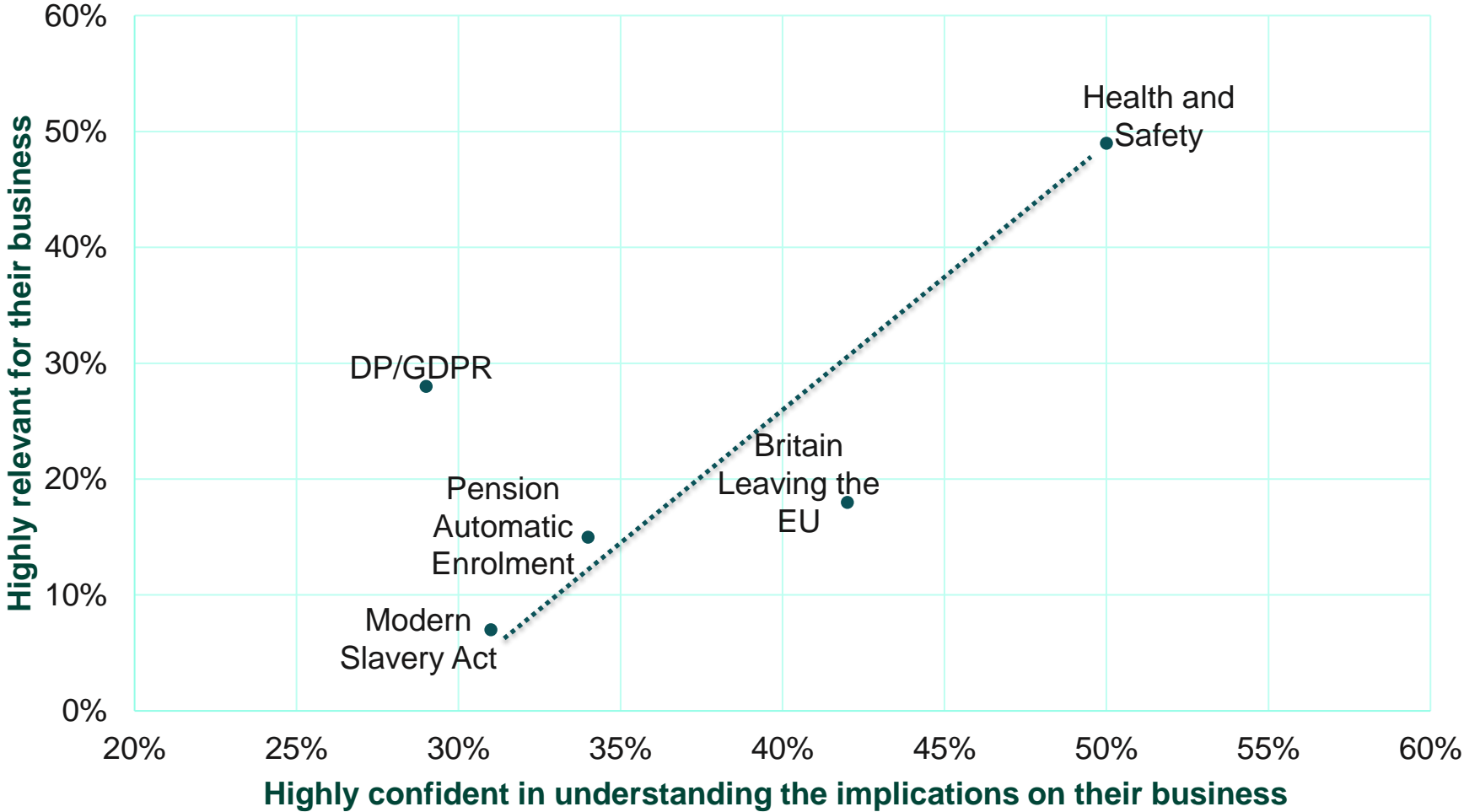
Those who think DP/GDPR is relevant to their business
 43%

Those who think DP/GDPR is irrelevant to their business
 22%

■ Not at all confident ■ Not very confident ■ Somewhat confident ■ Very confident ■ Extremely confident

DP/GDPR is an outlier. Confidence levels lag behind relevance in relative terms.

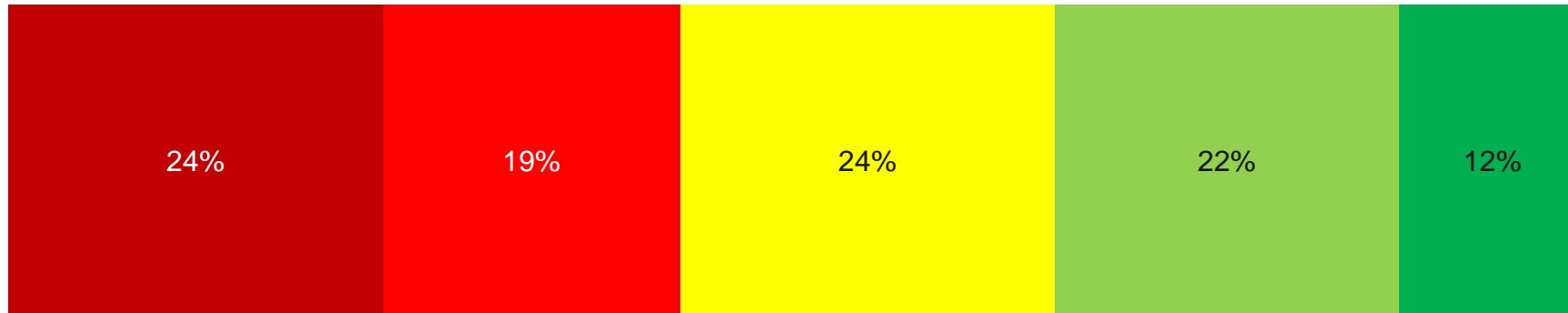
Relevance for their business vs. confidence in understanding implications on their business



One in three SMEs regard DP/GDPR as being of high importance to their business. Slightly more are likely to state that it is important to their clients/customers.

How important is data protection/GDPR to your business?

■ Not at all important ■ Not very important ■ Somewhat important ■ Very important ■ Extremely important

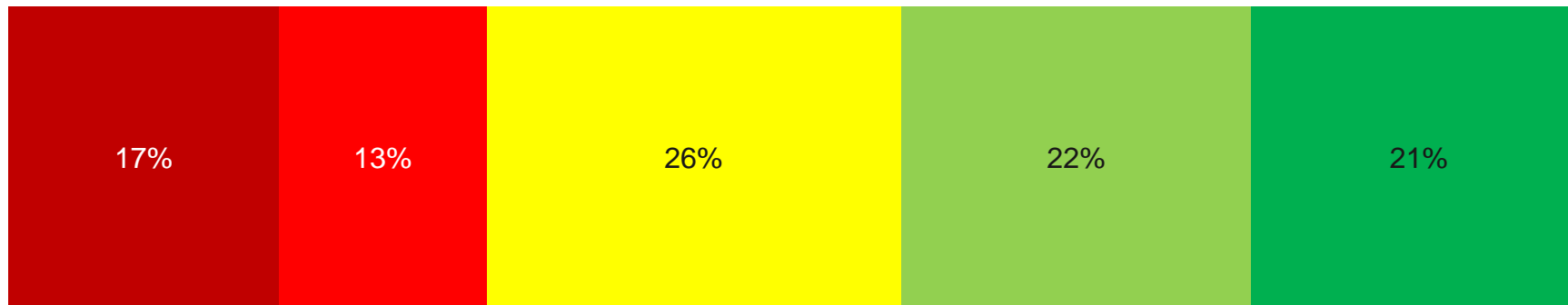


NET unimportant
Total: 43%

NET highly Important
Total: 33%
SMEs 0-9: 26%
SMEs 10-49: 55%

How important is data protection/GDPR to your customers/clients?

■ Not at all important ■ Not very important ■ Somewhat important ■ Very important ■ Extremely important



NET unimportant
Total: 30%

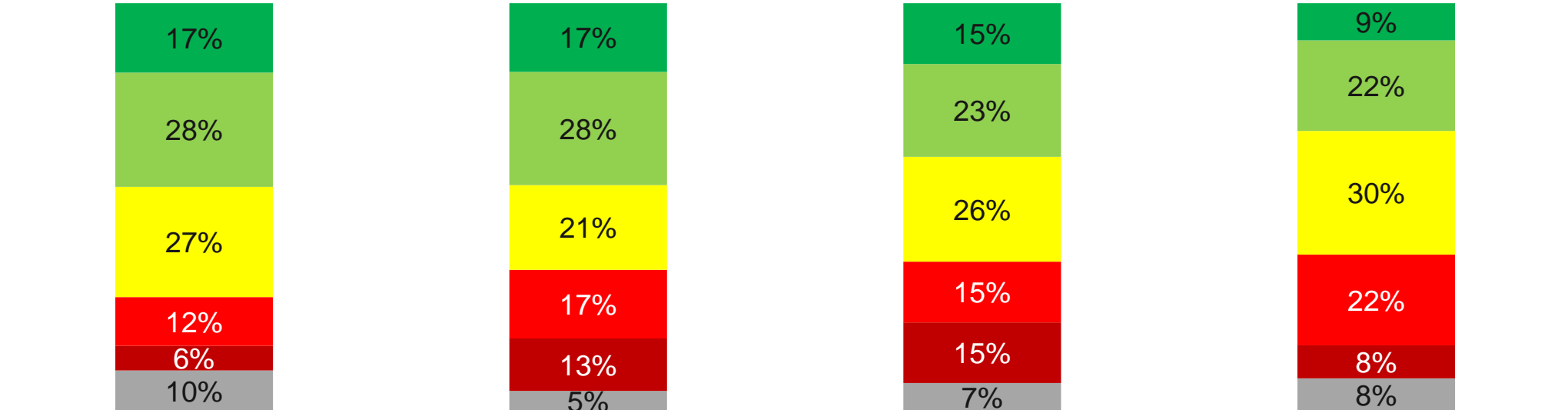
NET highly Important
Total: 43%
SMEs 0-9: 37%
SMEs 10-49: 64%

Many agree that DP/GDPR is unnecessary bureaucracy and only do the minimum necessary. Almost half agree it is easy to find out about regulations, although as many agree these are easy to understand as disagree.

To what extent do you disagree or agree with the following in relation to data protection/GDPR?

NET Agree

Total	45%	45%	38%	31%
SMEs 0-9	39%	46%	41%	29%
SMEs 10-49	64%	39%	30%	36%



It is easy to find out about data protection/GDPR regulations It feels like unnecessary bureaucracy We only do the minimum necessary It is easy to understand data protection/GDPR regulations

■ Don't know ■ Strongly disagree ■ Slightly disagree ■ Neither ■ Slightly agree ■ Strongly agree



Q24. To what extent do you disagree or agree with the following in relation to data protection/GDPR?
Base: All respondents : (208)

Perceptions of DP/GDPR pre- and post- interview: better appreciation of potential benefits as well as requirements

*“It’s very important for the **reputation** of the club or organisation to be registered”*

Very important (larger companies/ organisations handling lots of customer data)

- Consider themselves compliant
- But uncertain if we are registered or pay a fee ...

*“I saw the phrase coming up a lot a couple of years ago, but I thought **because I’m a one man business**, it doesn’t apply. That belongs to proper companies”*

Smaller/sole traders feel doesn’t apply to them

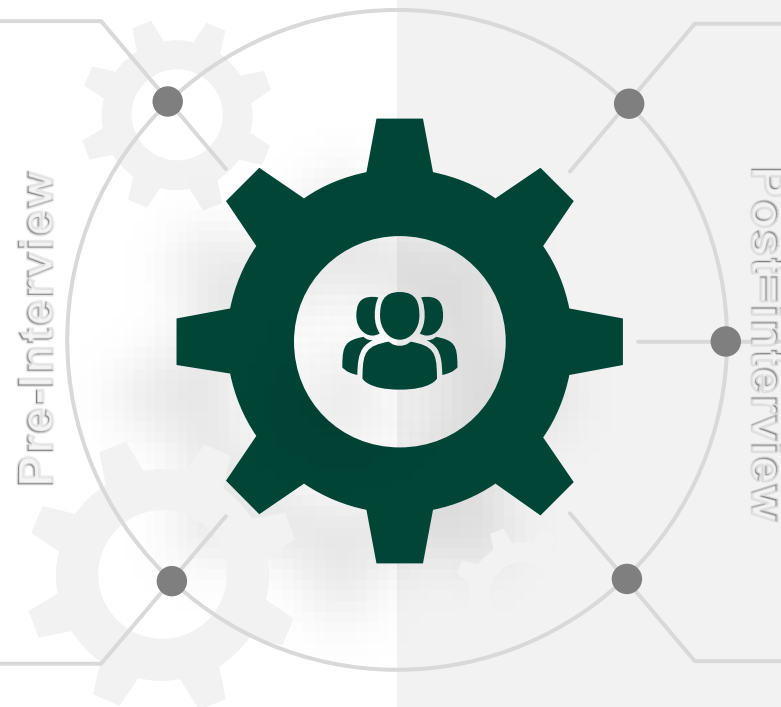
- Only data is contact details of clients
- Uncertainty over what data is/should be covered:
 - Financial data?
 - ‘Track & trace’ information?

More important than had appreciated - for company reputation [2] (trust if registered)

Educated about fee - will check that fee is paid and company registered

Will review again if need to be registered:

*“It’s probably more important than I thought because of the **reputation** of the company, and the trust if you are registered – that you are a trustworthy organisation”*





Key finding 3:

The barriers and motivations towards DP compliance and paying the DP fee

Only one in five are aware that SMEs need to register with the ICO and pay a DP fee, and only one in eight have considered doing this.

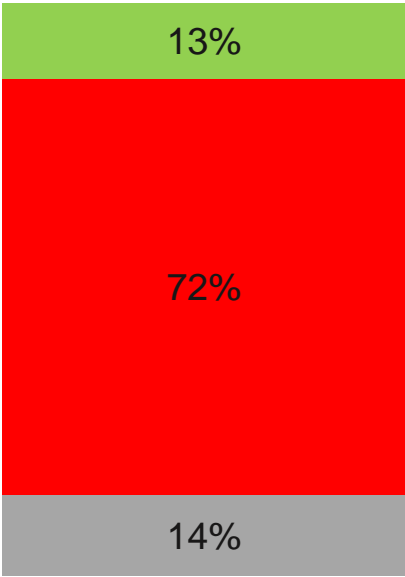
Before today, were you aware of the following? (% stating Yes)

22% are aware that small businesses need to register with the ICO and pay a data protection fee unless exempt

38% feel that some personal data breaches must be reported to the ICO

SMEs 0-9: 31%
SMEs 10-49: 58%

Before today, have you ever considered registering with the ICO and paying the data protection fee?

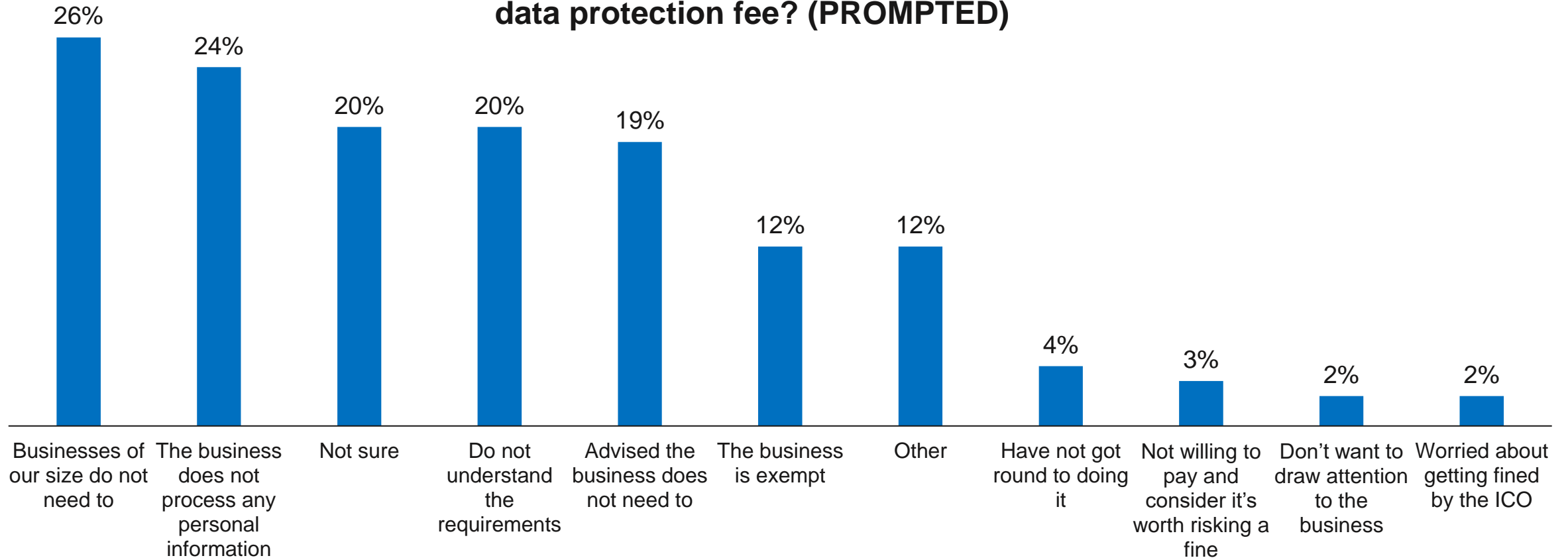


SMEs 0-9: 11%
SMEs 10-49: 21%

- Yes – I or someone else has checked
- No – never checked
- Don't know

When prompted, the most common reasons for not paying the DP fee are because of business size and not processing personal information.

Which of the following, if any, are reasons your business does not register with the ICO and pay a data protection fee? (PROMPTED)



Barriers to registration are often due to lack of clarity about what constitutes 'personal information'

3 smaller organisations believe they do not need to be registered

- One done questionnaire on website – 90% confident
- One sent in return to say exempt (only hold client details for invoicing and contact)
- One never considered reviewing
- 'Unnecessary' cost can be a hurdle, particularly in the current climate

3 larger organisations understand data protection to be important and felt certain they were compliant

- But were not sure if their organisation paid a fee

Messages need to address these specific rationales and address micro-businesses directly:

- *"Even if you only hold client contact details ..."*
- *"Let's make certain you are compliant ..."*
- *"Even if you are a freelancer ..."*
- *"Even if you have no online presence ..."*
- *"Data protection is not just about financial data ..."*

"The way I perceive data protection and GDPR – I think about sensitive data (financial or personal), not email or telephone numbers"

3

"I only keep clients' contact details for invoicing purposes"

"I've never been asked by a client ..."

"I don't have any formal databases"

"Our financial processing is secure (with Barclaycard)"

"Most information is just what's in my phone and email"

"We don't employ anyone other than family"

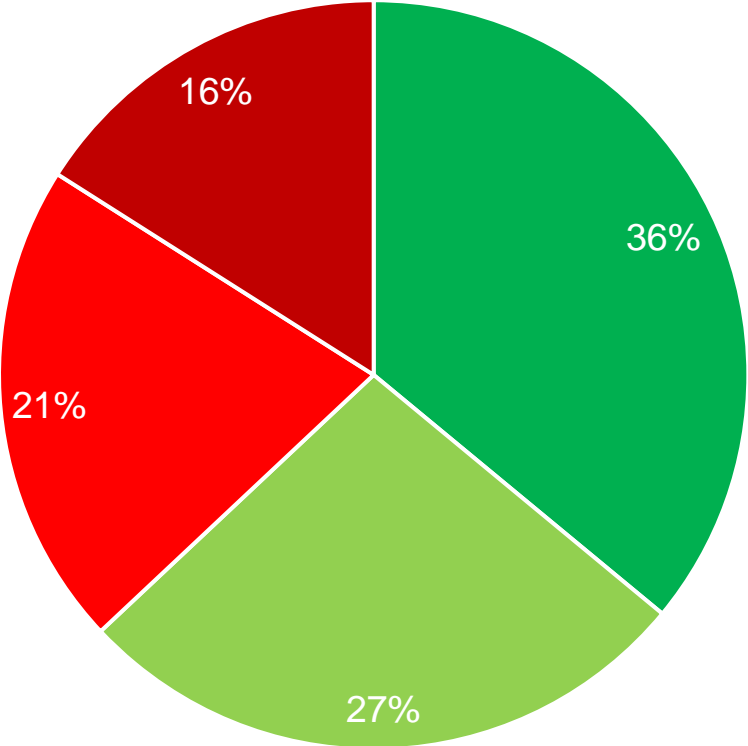
"I'm not selling data"

"I don't think I've got any information that couldn't be found out with a Google search"

"Our CCTV doesn't record"

Almost two in three SMEs have at least some desire to get DP/GDPR right within their business, rising to over four in five amongst those with 10-49 employees.

How much desire do you have to get data protection/GDPR right within your business?



NET A lot/some desire

Total: 63%
SMEs 0-9: 57%
SMEs 10-49: 82%

Businesses formed in last 5 years: 76%
Businesses formed 6+ years ago: 59%

Those aware that small businesses need to register with the ICO and pay a data protection fee unless exempt: 85%

Those not aware that small businesses need to register with the ICO and pay a data protection fee unless exempt: 57%

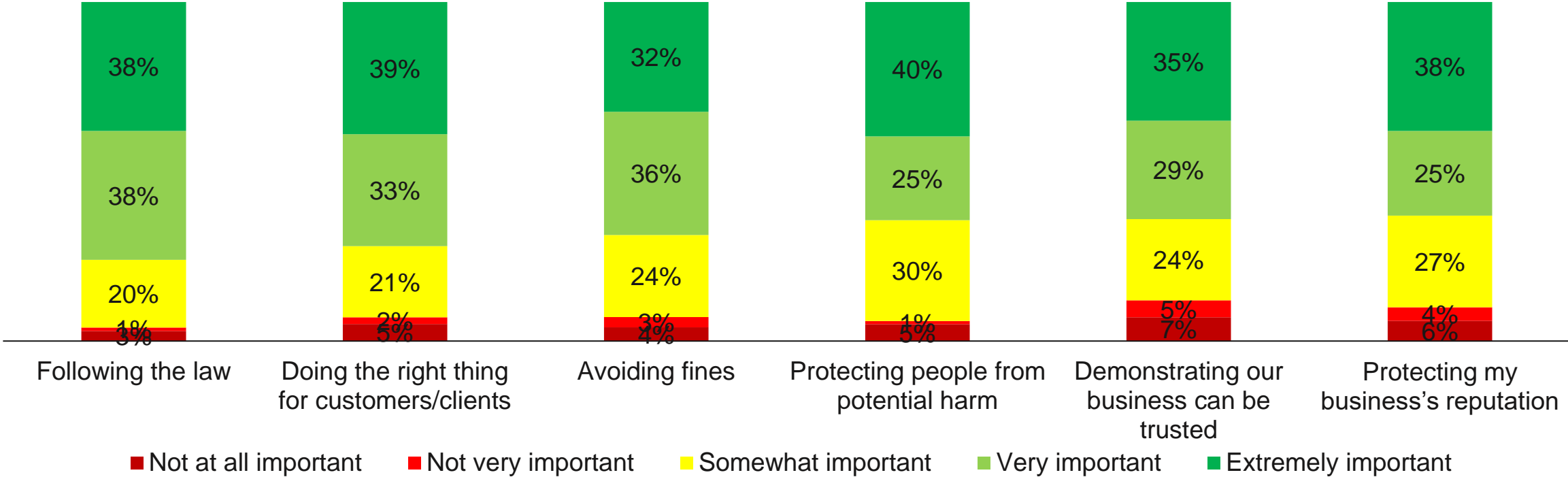
■ A lot of desire ■ Some desire ■ Not very much desire ■ No desire at all

“Following the law” and “doing the right thing for customers/clients” are deemed the two most important reasons for complying with DP/GDPR regulations. Demonstrating trust is the reason that most disagree with.

How important are the following reasons for complying with data protection/GDPR regulations?

NET highly important

Total	76%	71%	69%	64%	64%	63%
SMEs 0-9	70%	67%	62%	61%	59%	56%
SMEs 10-49	94%	85%	88%	76%	79%	85%



Some SMEs suggest that their business could improve their DP, with a mix of comments around improving practices and keeping abreast of regulations and trends. Others believe they are already doing enough or it is not relevant.

In what ways do you think your business could improve its data protection/GDPR?

By keeping abreast of technology and the threat of scams.

We could probably benefit from professional advice.

Not sure we can - we have introduced a lot of changes since GDPR. Make sure new staff are properly trained.

I am not too sure but no one else has access to my files.

I don't think there is much else we can do based on the insignificant amount of data we hold.

We could perhaps be a little more pro-active in researching the future GDPR requirements so we can be better prepared.

Not have paper to deal with - scan copies and send to lenders but customers insist on using paper or do not know how to operate digitally.

I am quite satisfied that my business complies with all legal requirements expected with regards to data protection.

It's not relevant to my business as far as I can tell.

As we hold no data, we have no need for data protection. If anything it is the responsibility of our franchisor.

I am not a big corporation, just a one-person business. So I know customer data is safe with me.

Maybe always looking for new ways of storing the information and new and different websites.

By deleting all old customers.

Nothing comes to my mind to be honest. I never store very sensitive data such as bank or debit card details to avoid data theft. Clients' documents like HMRC or medical letters are stored in a folder with a neutral name that does not reveal its content and a laptop is for my sole use.

SMEs suggest making them aware of their DP responsibilities at key moments, such as when registering businesses and annually thereafter

What would help you and your business in meeting its data protection/GDPR responsibilities?

Information sent via HMRC every year with tax return.

Clearer advice on what the requirements are, generally available on the internet.

The rules could be promulgated better. it should not be up to a small business to search for information that they do not know exists.

A quick and no hassle online course.

It would help if when you register your business that you are told about this and what you have got to do or haven't got to do.

Clear and easy instructions & regulations to be made readily available and free to use for small business.

Letter informing me if data protection is relevant to my specific business.

All information in one place and in simple English.

Maybe it would be helpful if the information was sent to you by either the inland revenue or maybe your insurance company when you insure your company for public liability insurance.

Public campaigns to raise awareness, working with trade bodies.

Proactive information from the ICO on a frequent basis.

To be better educated on the matter directly from source.

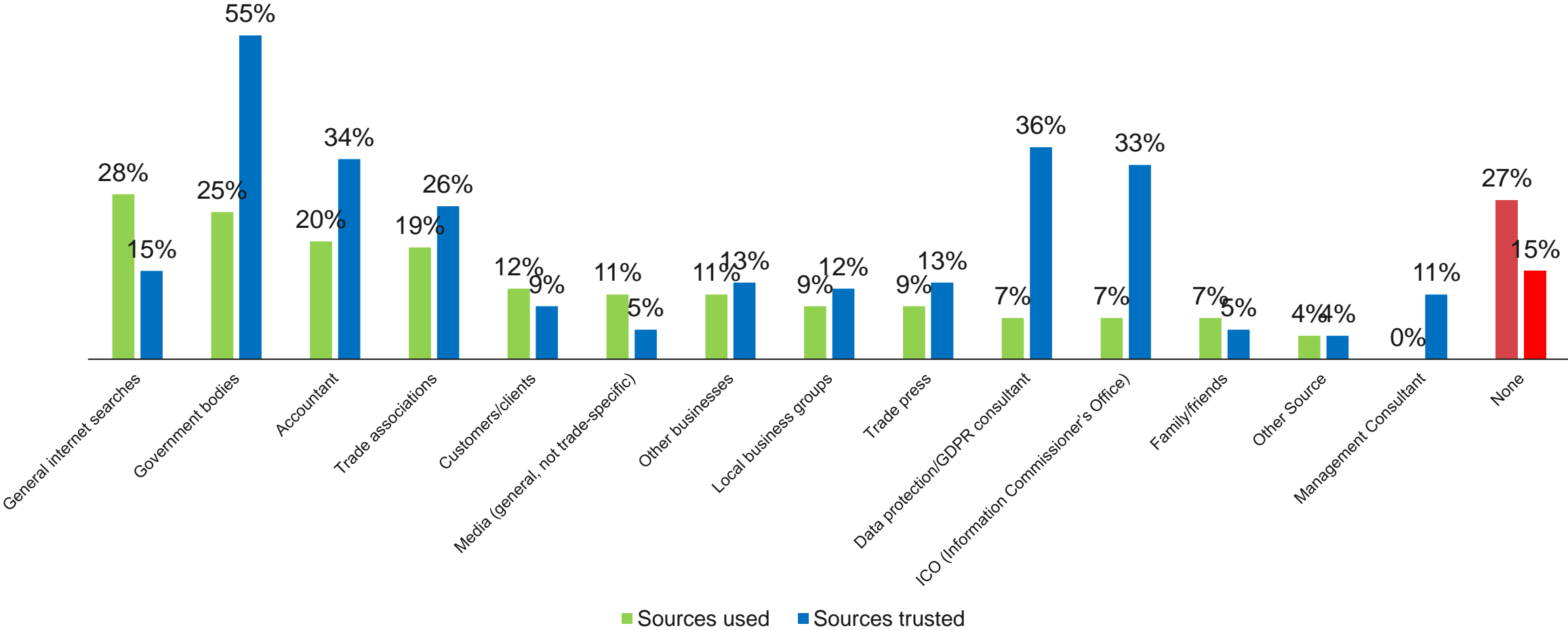
I do not really know what I need but some simple basic details should be easily available and made more accessible.



Key finding 4:
Targeting future comms

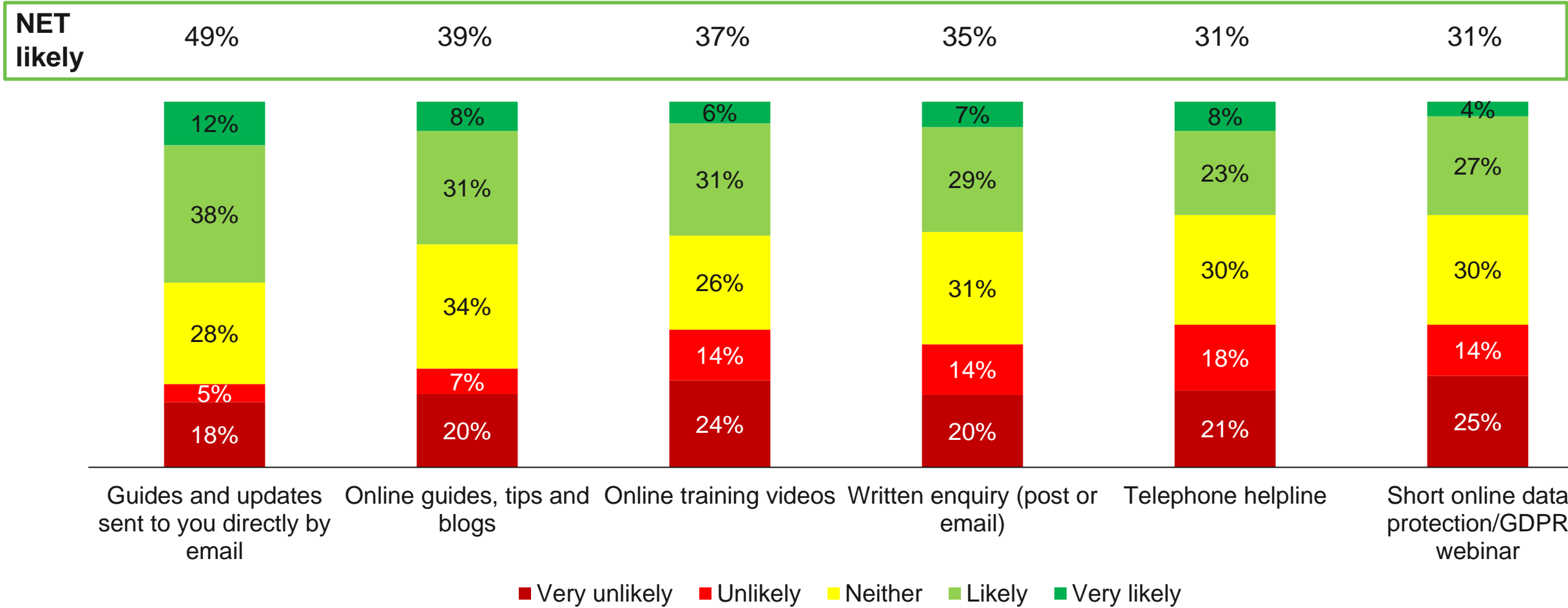
General Internet searches are the most commonly used source for DP/GDPR, but more trusted sources would be Government bodies, DP/GDPR consultants, accountants, the ICO and trade associations.

What sources do you use/trust for information and advice about data protection/GDPR?



Half of SMEs stated that they would be likely to use guides and updates sent to them directly by email to find out more about their DP/GDPR responsibilities.

How likely would you be to use the following free sources to find out more about your business' data protection/GDPR responsibilities? (those with highest likelihood)





Key finding 5:

Understanding and interpretation of messages

What’s required from an SME: action prompted by uncertainties that resonate – but it doesn’t address those who feel they do not have the ‘right’ data

Message

- You are / everyone in the organisation is responsible for any data you hold
- Ensure it is secure / you have control
- A checklist

TOV

- Positive; polite but firm, authoritative but not aggressive; serious; to the point
- Perhaps a little too forthright?

*“It’s in **straightforward language**, not flowery – it’s at my level – it’s not full of jargon: you have these responsibilities – it’s non-negotiable – you have to do it”*

Green text = words / phrases that are clear and directly stimulate reaction
 Red text = words / phrases that confuse or create doubt about how to react

Showcard 1: Description of what is required from an SME in terms of data protection/GDPR

- You need to know **what data your business holds about people, and why you have it**
- You must make sure the data you hold is accurate and secure, and **tell people what you’re doing with it**
- You need to know what rights people have when it comes to their data
- You should **make sure you know what to do if something goes wrong, such as if there’s a personal data breach**
- And you should make sure you’ve paid your **data protection fee, if it’s payable**

‘What data your business holds’, ‘secure’, ‘tell people what you’re doing with it’: unequivocal and informative
 ‘Make sure you know what to do ...’: need to check this
 ‘Personal data breach’: how do I know if I’ve had one?
 ‘If it’s payable’: how do I know if it is?

*“Suggests a **sense of responsibility** towards data ... I would be taking an active part in protecting information “for the safety of others”*

Aimed at businesses like you

Yes!

- Language is clear and simple: can understand it
- Personal reference: ‘you’
- Because we have lots of data ...

No!

- I have no data ...

Action:

Will check the areas I’m not sure about ...

- ‘I don’t tell people ...’
- ‘What data do we have exactly?’
- ‘Do we pay a fee?’
- “Who do we need to contact if something goes wrong”

*“There’s a **small bell ringing** from point 2 – should I have something on my communications?”*

Cost/benefits of registering: more ‘carrot & stick’ approach; feels to be more targeted at bigger organisations, not micro-businesses / sole traders

Message

- Do I need to pay?
- Register is interesting ...
- Hadn't thought about benefits ...

TOV

- Helpful; more explanatory
- Lighter; more personable

“Explains more about why it’s important and what the benefits are ... I didn’t know about a **searchable register** – that could be a useful addition to our message”

“It’s making me think that when business comes back, £40 isn’t too bad an investment for the **advantages**... It’s also **contributing** to the system which keeps things running properly”

Green text = words / phrases that are clear and directly stimulate reaction

Red text = words / phrases that confuse or create doubt about how to react

Showcard 2: Description of the cost of registering / benefits of registering

- *It’s the law to pay the data protection fee, which funds the ICO’s work, but it also makes good business sense. Whether or not you have paid the fee could have an impact on your reputation.*
- *Paying the fee and being listed on the ICO’s register of fee payers shows that your company take data protection/GDPR seriously. It is a strong message for your customers – it lets them know that you value and care about their information. It also lets other organisations know that you run a tight ship.*
- *Most companies will only need to pay £40 or £60 a year. For large organisations the fee is £2,900.*
- *If you need to pay and don’t pay, you could be fined.*

‘It’s the law ...’: surprised to learn this but clear in its message
 ‘ICO’s register’: new information; potentially a benefit
 ‘Strong message for your customers...’: how do they know?
 ‘Other organisations’: irrelevant because we are so small ...
 ‘If you need to pay’: it’s the law, isn’t it? Creates doubt ...
 ‘You could be fined’: clear and action-orientated

“Mention of fees ... **would reconsider**, especially reading ‘could be fined’ ... I see you are included on a **list of ‘approved’ providers** – that feels quite positive”

Aimed at businesses like you

- Yes!
 - Clear and unambiguous
- No!
 - For bigger businesses – those with staff (no reference to ‘you’)

Action:

- Reconsider / look into fee because of fine
- Check register – possible benefits
- Visit the ICO website; speak to accountant’, Google

“It’s **very clear** – especially the last point – that’s the bottom line. It makes me feel that I might **have another look** at whether I need to reconsider the exemption”

“The first thing I would do is try to **get some more information** to see if I should pay – I might speak to the accountant ... I’d probably Google and find out what I need to do”

Role of the ICO: a very clear and motivational message which positions ICO in a more positive light

Message

- Offering help
- 'You are not alone'
- 'Don't have to use your own judgement'
- Becoming compliant – getting it right first time

TOV

- Positive
- Supportive
- Reassuring
- Non-threatening

*"Here to help' is great – I feel a lot easier – I can **get in touch** ... give them your details and they'll help you **do it correctly**"*

*"I didn't know what ICO was! It's saying their role is mainly positive ... somewhere **central to help**"*

Green text = words / phrases that are clear and directly stimulate reaction

Orange text = works for some, not all

Showcard 3: Description of the role of the ICO in relation to helping SMEs

*Even though the ICO ultimately **has the power** to issue fines, most of our work with **small organisations** is focussed on helping them get data protection/GDPR right first time around, **through our events and our support and advice services. We're here to help.***

'has the power': kinder way of phrasing 'enforcer'
'small organisations': signals message for those other than ST
'through events Here to help': open and inviting – clear that 'open to all'

*"Here to help' – not just to crack the whip – they're **encouraging** you to speak to them, have an open dialogue"*

*"(Data protection and GDPR) is quite scary – there's a lot to take in and set up, so to know you have **support and advice** – it means a great deal to know you have someone to help out"*

Aimed at businesses like you

- Yes!
 - Focused on small organisations
- No!
 - Not speaking to sole traders or the self-employed

Action:

- Seeking real, specific communication about 'my business':
 - Visit website and look for email address
 - Ask about my business directly
 - Look for events

*"Now I've read SC3, I would **go to the website** and look for an email address – so that I can ask if I should pay a fee – rather than using my own judgement"*

*"**Need to reference freelance or self-employed** people – we feel separate to a small organisation which has a body of employees"*

Resources available: sound achievable – low hassle – suitable for busy people running their own business

Message

- It's going to be easy ...
- Accessible
- User-friendly

TOV

- Very helpful
- Friendly
- Approachable

*“Sounds like it's **for me** – someone getting on with doing a job”*

*“**It's easy** to do it – go on there, there's a simple guide, and live chat and a helpline if you need it”*

*“A **dedicated** service for small companies ... much more **user-friendly**”*

Green text = words / phrases that are clear and directly stimulate reaction

Orange text = works for some, not all

Showcard 4: Description of the resources available

*You'll find a range of top tips, **simple guides**, toolkits and **checklists** on our data protection hub for **small organisations** to help you understand and comply with your data protection/GDPR obligations.*

*We also run a **dedicated** advice service for **small organisations** including a helpline and **livechat** service.*

'simple guides and checklists': suitable for the layman
'small organisations': signals message for those other than ST but great that it is specifically for smaller organisations
'livechat': means I can communicate at any time

*“Makes it more **friendly** ... interested in **helping SMEs** rather than a lofty organisation who just expect people to know ... a less scary organisation”*

*“Feels more **legitimate** – lots of online resources ... not just taking but **giving back** ... a genuine reason why they (ICO) function – to support and advice”*

Aimed at businesses like you

- Yes!
 - A dedicated service
 - Demonstrates understanding of being a small business (out of hours access)
- No!
 - Not speaking to sole traders or the self-employed

Action:

- Need to make sure we are doing it right
- Go to website – try to understand what is needed
- Ask directly if struggling to understand

*“That has answered my question – I would definitely **use live chat** to see if I ought to be paying a fee”*

*“Feel **relieved** I can get in touch ... can do it now”*

Potential messages: clear, resonating business message in advisory tone is potentially effective

Showcard 5a: Message

As well as being the law, good data protection/GDPR also makes good economic sense because it saves you time and money.

Message

- ‘Time & money’ statement of fact – true and relevant
- Makes sense – resonates with small businesses

TOV

- Advisory rather than stern
- Business-like
- Authoritative

Preferred option: 3/6
Clear, business-like, relevant

Showcard 5b: Message

Good data protection/GDPR practices shows everyone at your business and the people you come into contact with that you care about their information, which is good for your reputation.

Message

- Less clarity around message
- Reputation is important – but unclear how necessarily linked to data
- Principle rather than instruction

TOV

- ‘Touchy feely’
- Friendly
- Advisory

Preferred option: 2/6
Larger organisations; reputation critical

Showcard 5c: Message

More and more, people are becoming aware of their personal data and how it’s being used, so any organisation that wants to be trusted has to get it right. If people don’t trust how their data is being used, they’ll stop giving it out.

Message

- Customers have to trust organisations
- Organisations have a duty of care
- Suggesting will lose customers
- Do not agree with premise [2/6]

TOV

- More negative
- Bossy
- Not friendly or helpful

Preferred option: 1/6
Relate personally: scams during Covid

Messages testing lack of recognition and lack of skill/ownership are deemed most relevant overall. There is no standout message in terms of likelihood to make businesses pay the fee, though “DP/GDPR is everyone’s responsibility” achieves the highest score.

Communications dashboard: Base Total (208)		Relevance (% NET highly relevant)	Likelihood of making you pay the DP fee (% NET highly likely)
[Testing lack of knowledge]	The ICO is here to help you understand the regulations around data protection/GDPR and what they mean for your business	27%	26%
	Paying the fee and being listed on the ICO’s register of fee payers shows that your company take data protection/GDPR seriously. It is a strong message for your customers – it lets them know that you value and care about their information. It also lets other organisations know that you run a tight ship.	23%	26%
[Testing lack of recognition]	If people don’t trust how their data is being used, they’ll stop giving it out	39%	28%
	Running a small business might seem vastly different from a large company or corporation. But the data protection/GDPR rules are the same because if personal data falls into the wrong hands, it makes no difference where the error came from.	37%	30%
[Testing lack of interest]	Data protection/GDPR is a core business function	29%	23%
[Testing lack of skill/ownership]	Data protection/GDPR is everyone’s responsibility	43%	33%
	The people who trust you with their data could come to harm if their personal data gets lost, damaged or stolen	39%	28%
[Testing lack of time/money]	Good data protection/GDPR practices makes good economic sense because secure, accurate, organised data ends up saving you time and money in the long-run.	33%	28%

Amongst those who have at least some desire to ensure that DP/GDPR is right within their business, communications testing lack of skill/ownership were deemed most relevant to their business and would have the greatest likelihood of making them consider to pay the DP fee.

Communications dashboard: Base: Those who have a lot/some desire to ensure that DP/GDPR is right within their business (126)		Relevance (% NET highly relevant)	Likelihood of making you pay the DP fee (% NET highly likely)
[Testing lack of knowledge]	The ICO is here to help you understand the regulations around data protection/GDPR and what they mean for your business	35%	36%
	Paying the fee and being listed on the ICO's register of fee payers shows that your company take data protection/GDPR seriously. It is a strong message for your customers – it lets them know that you value and care about their information. It also lets other organisations know that you run a tight ship.	33%	36%
[Testing lack of recognition]	If people don't trust how their data is being used, they'll stop giving it out	53%	36%
	Running a small business might seem vastly different from a large company or corporation. But the data protection/GDPR rules are the same because if personal data falls into the wrong hands, it makes no difference where the error came from.	49%	39%
[Testing lack of interest]	Data protection/GDPR is a core business function	38%	33%
[Testing lack of skill/ownership]	Data protection/GDPR is everyone's responsibility	57%	43%
	The people who trust you with their data could come to harm if their personal data gets lost, damaged or stolen	54%	39%
[Testing lack of time/money]	Good data protection/GDPR practices makes good economic sense because secure, accurate, organised data ends up saving you time and money in the long-run.	46%	38%

Ideas from SMEs for messages that might encourage businesses to pay the DP fee include helping SMEs understand their obligations and explaining the benefits – but greater awareness is key.

What other ideas for messages do you have that might encourage your business and other similar businesses to pay the data protection fee?

More detailed and easier to understand information and advice on compliance, consequences and costs.

Not so much a message, but more for the message to have a bigger presence in our field. Maybe more advertising? Also to enforce the idea of a small annual fee making a BIG difference.

Regular emails and postal communication.

I'm not sure, but something which creates a genuine need, rather than making me feel like I am being asked for £40 out of fear.

Clear public campaign about the legal requirement and how this affects small businesses.

Paying the data protection fee will make it far easier to receive information about the GDPR rules and requirements.

A clearer explanation of the benefits - as I see it the data protection act required us to introduce significant data management which I have no problem with. The fee feels like a tax - frankly we should be getting a grant to help us with the expense not being taxed for doing it. Government ploughs millions into big business and not only loads small business with regulations but charges us for them to exist.

Explain what the ICO does.

Accentuate the positives of the fee and this would encourage people.

How to reach small businesses and organisations



“Let people know that **everyone should look into it** – no matter how small”

“It’s most important that it’s **quick** to be able to do it (check) – the initial enquiry should take no longer than 10-15 minutes and then be able to come up with a first step solution “

“If you need to speak to them (ICO), they should be **helpful and friendly** – not talking down – able to explain in **layman’s terms** if someone doesn’t understand“





Recommendations

Recommendations (1)

- Messages must be clear and unequivocal
 - Speak directly to different types of organisation who have different levels of understanding and motivation:
 - ‘you’ for sole traders / freelancers / those with familial partners
 - ‘the business’ or ‘the organisation’ as a less personal approach for those with two or more employees (or maybe larger)
 - Address specific barriers and arguments:
 - different organisations and individuals have different perspectives on what is important to them e.g. bottom line ‘time & money’ is fundamentally important but speaks more to those in charge (owners/senior managers); reputation is perceived as more vital to those in certain sectors; some respond more to ‘doing the right thing’
- A friendlier, supportive message has greater potential to warm readers towards ICO, but may need to be combined with a ‘stick’ (fines/‘the law’) to prompt or prioritise action. Both need to be delivered in a direct and positive manner.
- Simple, targeted checklists, toolkits and case studies (by size and sector) all add to the perceived approachability and supportive element of ICO.
 - Specific, direct support in the form of live chat and helplines provide a ‘safety net’ and reassurance that specific answers will be available if and when needed

Recommendations (2)

- Building and communicating clearer, more tangible value to registration helps to substantiate and rationalise the fee:
 - The idea of a 'searchable register' has perceived tangible benefit to smaller organisations and sole traders - the principle of 'certification' but expressed in a more directly usable format
 - There may also be potential interest in training for employees via the ICO site, either free or at reduced rates as added value
- Improving the 'approachability' of the ICO website would be beneficial
 - Clearer definition of 'organisational' rather than 'personal'
 - Ideally a clear and direct route in for SMEs / sole traders
 - Live chat must be responsive – and give definitive assistance over and above what is available on the website



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