IFF Research

ICO Data Controller Study: Technical Report

The Information Commissioner's Office

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1 Introduction

Objectives

The ICO's strategic vision, ICO25,[1] sets out four key objectives:

- Safeguard and empower people.
- Empower responsible innovation and sustainable economic growth.
- Promote openness and transparency.
- Continuously develop the ICO's culture, capacity, and capability.

To achieve each of the objectives in the ICO25, it is essential that the ICO has a detailed understanding of how data controllers operating within the UK collect, process and store personal data. This will be used to help the ICO build a comprehensive picture, which will in turn inform decision making and policy development.

The ICO commissioned IFF Research to conduct both quantitative data collection and qualitative interviews with organisations with the aim to understand:

- The demographic characteristics and personal data processing activities of data controllers.
- The technology used by data controllers.
- Innovation considerations of data controllers.
- The interactions between data controllers and the wider regulatory landscape.

A mixed-method approach was undertaken, with a total of 2,292 quantitative questionnaires completed followed by 20 qualitative interviews.

[1] ICO25 strategic plan | ICO

2 Methodological Approach

Outline of methodological approach

The Data Controller Study (the Study) comprises a quantitative survey and qualitative interviews. This is the third wave of data collection for the Data Controller Study. Fieldwork for wave 1 occurred in 2023 and was completed in 2024, while fieldwork for wave 2 was in 2024 and early 2025 and the project concluded in 2025.

The quantitative survey is a sample survey, designed to provide estimates of population values to support ICO25 objectives and measure outcomes. As the sample seeks to represent a diverse population of organisations, the weighting approach used to produce statistics that are consistent with the population is of particular importance to the survey design approach.

Research into the population of the in-scope organisations has informed the sampling approach taken. The first step was to identify and learn more about the population of interest. The data controller definition is provided in Article 4 UK General Data Protection Regulation (UK GDPR) as those organisations that determine the purposes and means of the processing of personal data, for the purpose of the Study we have excluded personal data processing for HR or related purposes.[2] This, therefore, is a subset of all organisations operating in the UK, many of which do not process personal data and so remain outside the scope of this survey.

Defining the Population of Data Controllers

The sampling and weighting approach has been kept largely consistent since the first wave of the research and has focused on ensuring representation of the population of data controllers. In year 1, the ICO identified a set of characteristics that were used to identify a representative sample of the target population of interest.

As in Year 1 and Year 2[3], we used data from the DCMS Business Data Survey to identify the percentage of organisations that are data controllers from the broader population of organisations[4] and data from the BEIS Business Population estimates to identify the population of organisations in different business sectors that are data controllers.[5]

In Year 3, we have replicated this approach utilising the most up-to-date data from both of these surveys, which in this case were the 2024 DCMS Business Data Survey and 2025 Business Population Estimates.

Table 2 of the Business Population Estimates provides breakdowns of the population of Private Sector, Central and Local Government and Non-Profit organisations by number of employees, providing a full picture of organisations operating in the UK that are within the scope of this survey.

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[2] UK GDPR for data controller definition Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation)(Text with EEA relevance)

[3] data-controller-study_technical-report.pdf / ICO Data Controllers Year 2

[4] UK Business Data Survey 2024 - GOV.UK (www.gov.uk)

[5] Business population estimates 2025 - GOV.UK

We estimated population weights, tabulated by two characteristics, organisation size and organisation type in order to identify a representative sample of data controllers. Organisation size was defined based on the number of employees, as follows:

- Sole Traders 0-1 Employees
- Micro 2-9 Employees
- Small 10-49 Employees
- Medium 50-249 Employees
- Large 250+ Employees

The second characteristic considered was organisation type and it was defined as:

- Private Sector
- Public Sector
- Not for Profit Organisations

The organisation characteristics were cross defined, so that for each organisation type there are five size bands, and for each size band there are three types of organisations. Hence, in total, 15 pairwise combinations of organisation size and type were identified. Each of these combinations was assigned a population weight, representing the proportion of the data controller population which had this pair of characteristics. Overall, these population weights add up to 100%, representing total coverage of the known population of data controllers.

By multiplying the number of private businesses in the Business Population Estimates data, by the percentage of data controllers in the DCMS Business Data Survey data, we obtain an estimate for the number of organisations in each type and size category that are data controllers. It should be noted that this estimation does introduce sources of error as both elements used in the calculation are sample estimates themselves, so there will be some unknown sampling error attached to the population proportions.

The population estimates based on 2025 Business Population Estimates and 2024 DCMS Business Data Survey data (for private sector) are shown in Table 1.1

Table 2.1 ICO Population Estimates: Overall population of data controllers by type and size based on the 2024 DCMS Business Data Survey

	All	Private Sector Business	Public sector organisation	Non-profit organisation
All	100%	97.175%	0.367%	2.458%
0-1 employees	73.204%	72.229%	0.149%	0.826%
Micro (2-9 employees)	19.807%	18.659%	0.070%	1.078%

Small (10-49 employees)	5.541%	5.083%	0.037%	0.421%
Medium (50-249 employees)	1.141%	0.986%	0.054%	0.101%
Large (250+ employees)	0.307%	0.218%	0.057%	0.032%

These are broadly consistent with the Year 2 population grid, which is reproduced in Table 1.2 for reference.

Table 2.2 Year 2 ICO Population Estimates

	All	Private Sector Business	Public sector organisation	Non-profit organisation
All	100.00%	96.94%	0.38%	2.68%
0-1 employees	72.39%	71.24%	0.15%	1.00%
Micro (2-9 employees)	20.43%	19.25%	0.07%	1.12%
Small (10-49 employees)	5.70%	5.24%	0.04%	0.43%
Medium (50-249 employees)	1.16%	1.00%	0.06%	0.10%
Large (250+ employees)	0.31%	0.22%	0.06%	0.03%

Sample Design

As in both previous years of the Data Controllers Study, in Year 3, the sample design was intended to achieve a broadly representative sample by organisation type and size. Table 2.3 shows what the sample would look like purely representatively and 2.4 shows what the sample would look like by rounding each grid to the nearest whole number. Due to this rounding the sum of some of the rows and columns in table 2.4 do not add up to the totals.

Table 2.3 Fully representative sample based on ICO population estimates

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
All	**2250**	**2186.3**	**8.325**	**55.35**
0-1 employees	1647	1625.2	3.375	18.675
Micro (2-9 employees)	445.73	419.85	1.575	24.3
Small (10-49 employees)	124.65	114.3	0.9	9.45
Medium (50-249 employees)	25.65	22.275	1.125	2.25
Large (250+ employees)	6.975	4.95	1.35	0.675

Table 2.4 Fully representative sample based on ICO population estimates[6]

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
All	**2250**	**2186**	**8**	**55**
0-1 employees	1647	1625	3	19
Micro (2-9 employees)	446	420	2	24
Small (10-49 employees)	125	114	1	9
Medium (50-249 employees)	26	22	1	2
Large (250+ employees)	7	5	1	1

It was also imperative that sufficient sample sizes were achieved within the key subgroups to facilitate meaningful analysis. In order to ensure sufficient data for subgroup analysis within all demographic distributions, population subgroups with fewer than 50 respondents in the estimated representative sample

[6] Some totals by row do not add up due to rounding.

were increased to this level. The sample size for private sector businesses with 0-1 employees was reduced to facilitate this due to the large sample size in this population subgroup. Table 2.5 sets out the resulting sample targets after this rebalancing has been applied. Throughout fieldwork these targets were closely monitored.

Table 2.5 Target sample of data controllers for year 3 of the study

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
	2250	**1750**	**250**	**250**
0-1 employees	1216	1116	50	50
Micro (2-9 employees)	520	420	50	50
Small (10-49 employees)	214	114	50	50
Medium (50-249 employees)	150	50	50	50
Large (250+ employees)	150	50	50	50

Private sector targets

In line with the approach in Year 1 and Year 2, in addition to overall organisation type, given the large proportion of private sector businesses it was important to consider that sectors for private sector businesses were reflected in the survey sample. Rather than setting specific targets and quotas, survey completions were monitored to reach a broadly representative sample and to make sure the distribution of respondents did not become too narrow. The proportion of businesses in each of the sectors is set out in Table 2.5, with the appropriate survey targets for a representative sample. These proportions are calculated by using the Business Population Estimates 2025 and applying the proportion of businesses that share personal data (other than employee data) from the 2024 DCMS Business Data Survey data. These proportions are then multiplied by the sample size for the private sector, 1,750, and numbers rounded to the nearest whole number, except as otherwise noted in Table 2.5.

Table 2.6 Proposed representative proportions of private business sectors in year 2 of the study

Private business sector	%	(n)
	100%	**1,750**
A Agriculture, Forestry and Fishing	1.44%	25
B,D,E Mining and Quarrying; Electricity, Gas and Air Conditioning Supply; Water Supply; Sewerage, Waste Management and Remediation Activities[7]	0.45%	10
C Manufacturing	4.55%	80
F Construction	14.28%	250
G Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	6.76%	118
H Transportation and Storage	4.89%	86
I Accommodation and Food Service Activities	3.98%	70
J Information and Communication	5.42%	95
K Financial and Insurance Activities	2.41%	42
L Real Estate Activities	3.49%	61
M Professional, Scientific and Technical Activities	16.86%	293
N Administrative and Support Service Activities	7.77%	136
P Education	6.64%	116
Q Human Health and Social Work Activities	8.25%	144
R Arts, Entertainment and Recreation	6.09%	107
S Other Service Activities	6.71%	117

Questionnaire Development

The ICO and IFF Research worked collaboratively in developing the questionnaire. The wave 2 questionnaire[8] was used as the base for wave 3. The ICO suggested some additions and small changes for wave 3 and worked closely with IFF to refine the proposed changes. Survey design principles, including using simple and concise language, a logical question order and ensuring clarity and neutrality were followed

[7] As an exact representation of the population, this would mean achieving 8 interviews with B,D,E Mining and Quarrying; Electricity, Gas and Air Conditioning Supply; Water Supply; Sewerage, Waste Management and Remediation Activities sector businesses. However, in order to ensure base sizes of at least 10 in each sector, we have increased this by two interviews and reduced the largest sector (M Professional, Scientific and Technical Activities) by two interviews.

[8] ICO Data Controller Technical report Year 2

and discussed during the development of the questions in order to minimise response bias wherever possible and ensure clarity of the questions.

The themes covered in the survey incorporated elements relating to the ICO25 measures, and specifically focused on the core objectives of this piece of research, which included:

- Gathering information on the **background of the data controllers**, such as the types of **services** they offer and whether they **store personal data**.
- What activities organisations undertake to **collect and process personal data**.
- **Technology and innovation** used and implemented when processing personal data; and
- Engagement with **data protection regulation and the ICO**, including costs incurred in complying with UK GDPR.

Panel soft launch

Prior to commencing mainstage quantitative fieldwork, a soft launch phase was conducted between the 17th and 20th of October 2025. The soft launch was conducted using panel providers and 171 surveys were completed in this stage.

The target for the soft launch was 50 responses (25 from each panel provider), however one panel provider underestimated how quickly some of the respondents would complete the survey leading to a larger number of responses from them. This had no impact on the final number of responses later in the work, but some Computer Assisted Telephone Interviewing (CATI) targets were updated to reflect panels exceeding individual quotas at this early stage.

A review of the data was conducted following the soft launch of the new or altered questions that had been included in year 3. It was determined that these questions performed well and did not require any changes.

A couple of minor alterations were made elsewhere in the questionnaire, as result of discussion with the interviewing team. A list of EU countries was displayed at D12 (Where does your business / organisation share UK residents' personal data internationally?) to help interviews be confident in providing accurate responses and F9 (Approximately, what has been the total cost of complying with UK GDPR regulations?) was updated so interviewers could prompt responses but did not have to read out all the codes.

All data collected as part of the soft launch study was included in the final data collected for the main quantitative survey. It is worth noting that all of the soft launch responses went through the same quality assurance process as the mainstage responses. All passed this process, meaning non were subsequently removed.

The profile of organisations that completed the soft launch are shown in Table 2.6. No specific organisation sizes, types or sectors were targeted. As anticipated by the nature of panel sample, all completed surveys were conducted with private sector organisations and mostly with larger organisations.

Table 2.6 Profile of soft launch

		Total	Percentage
Type of organisation	Private sector businesses	159	93.29%
	Public sector organisations	12	7.01%

	Non-profit organisations	0	0%
Size of organisation	**0-1 employees**	8	4.68%
	2-9 employees	5	2.92%
	10-49 employees	26	15.21%
	50-249 employees	54	31.58%
	250+ employees	78	45.61%
Total		171	100%

3 Data Collection / Fieldwork

Data Collection

For the quantitative survey, a total of 2,292 interviews were conducted using both Computer Assisted Telephone Interviewing (CATI) and an online survey.

A mixed approach was agreed between the ICO and IFF Research to pragmatically maximise the achieved sample size and make sure all organisation size and type combinations were represented with reference to the original target sample.

Quantitative fieldwork was conducted between 23rd October and 19th December 2025. All interviews were conducted with:

- Organisations that met the definition of a data controller: they collect, process or store personal data, other than for personnel, HR or related purposes.
- A person with responsibility for the processing of personal data within the organisation.

The questionnaire is included in Annex A., and was broadly structured into sections as follows:

- Main organisation profile screening.
- Data controller background.
- Personal data processing activities.
- Technology and innovation.
- Regulation and the ICO.
- About your organisation.

There were two sources used to recruit respondent organisations into the sample:

- **CATI approach:** For the CATI interviews, IFF Research sourced participant organisations' contact data from the Market Location database. This contained information on organisation type, size and nation. The survey was conducted by IFF interviewers between 23rd October 2025 and 19th December 2025 with the aim of achieving 1,250 interviews.
- **Online approach:** For online interviews, IRB and Toluna, the panel providers, invited organisations likely to be in scope. These invitations contained a link to the IFF Research administered survey. Prior to completing the online survey, participants completed a short screening process to ensure that they met the survey sample requirements. The online survey was conducted between 23rd October and the 13th November 2025 with the aim of achieving 1,000 interviews.

On average the quantitative questionnaire took 30 minutes to complete by phone and 14 minutes to complete online. In year 2 this was 29 minutes to complete by phone and 15 minutes to complete online (25 minutes and 1 minutes 5 online in year 1). The CATI approach required a longer fieldwork period than the online panel approach because interviews were conducted one-on-one by phone, often needing multiple call attempts and were subject to scheduling constraints. In contrast, the online panel surveys could reach many respondents simultaneously, making data collection much faster. Additionally, the CATI approach was designed to target the quotas remaining following the completion of the online panel surveys which led to an

increased number of businesses being screened out due to the quotas associated with their characteristics already having been fulfilled.

Fieldwork monitoring and changes

In order to ensure accuracy of the size and sector data, for both methodologies (online and CATI), organisation details were double checked during the screening process. The screening data was used for achieving quotas by type and size, and to confirm that the size information provided by the panel providers accurately represented the organisations' actual size. Small discrepancies were identified, implying there was some inaccuracy in the records held by Market Location, these were established and updated during screening. For example, a small number of data controllers moved up or down a size band once asked in the survey compared to what was recorded by Market Location.

Responses were closely monitored throughout fieldwork and IFF introduced a Red, Amber Green (RAG) rating[9] for each quota based on how difficult it was going to be to reach each target based on progress made and the remaining sample required. IFF managed to achieve the targets in most of the subgroups, however for Large (250+ employees) non-profit organisations this was not achieved. It was decided that IFF would allow completed interviews in the remaining subgroups to be included in the sample, where there were contacts available to make up any potential shortfall in the total sample size.

Achieved sample

The final sample achieved, after removals, categorised by organisation size and type is outlined in Table 3.1. A total of 2,337 interviews were completed and passed quality assurance checks; 45 responses were removed because respondents were not able to provide at least one of their size or sector.

Table 3.1 Achieved sample of data controllers(size x organisation type)

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
	2,292	1,765	270	257
0 -1 employees	1,231	1,078	54	65
Micro (2-9 employees)	535	439	57	54
Small (10-49 employees)	234	124	59	50
Medium (50-249 employees)	150	52	50	50
Large (250+ employees)	160	72	50	38

[9] Each category was allocated a colour based on likelihood to hit the target within that cell:

- Red indicated that this target would not be reached due to a lack of available sample;
- Amber indicated that it may be reached but was not guaranteed; and
- Green indicated the target had been met or would be met by close of fieldwork.

Quality assurance and exclusions

CATI interviews were regularly checked for issues by the internal IFF Research quality assurance team to ensure the correct respondents were being reached and questions were being asked as intended.

As discussed above, a total of 45 CATI surveys were removed because they responded either “don’t know” or “prefer not to say” to question B2 (whether the business or organisation was in the private, public, or non-profit sector) or question B7 (the number of people the organisation employed) and therefore could not be categorised and included in a weighted population estimate.

The IFF research team checked completed online surveys for any issues. In total, 182 responses, collected through the online panel, were excluded from the final data due to concerns around response quality. Responses were removed if they met the criteria for "speeders", defined as respondents who completed the survey in less than 30% of the average survey time. Responses were also excluded if there were concerns about the quality of open-ended answers, such as inconsistencies, nonsensical content, or outliers.[10]

Prior to removal of 227 responses from CATI and online combined, 2,529 interviews were completed. This included 1,252 interviews completed through the CATI route and 1,267 completed through the online panel. The exclusions and their reasons for exclusion are shown in Table 3.2.

Table 3.2 Responses removed from achieved sample

	Panel	CATI	Total
Total sample - before exclusions	1,267	1,252	2,529
Removal - panel (due to failing the quality checks including "speeders", outliers and non-sensical answers)	182	0	182
Removal - Sector unknown	13	7	20
Removal - Size unknown	10	8	18
Removal – Size and sector unknown	7	0	7
Total sample - after exclusions	1,055	1,237	2,292

After removals a final sample of 2,292 was achieved for the quantitative survey. In summary, the final achieved sample:

- Over-represented each of the larger organisation size bands (50-249 employees, 250+ employees), apart from medium public sector and large non-profit sector organisations.

[10] Outliers would be identified if responses to numeric questions were particularly extreme and contradictory with other responses in the survey.

- Over-represented all size bands of public sector organisations and non-profit organisations, apart from medium public sector and large non-profit organisations.
- Under-represented sole traders with 0-1 employees in the private sector to allow for a minimum number of 50 surveys in subgroups of the representative sample.

Table 3.3 outlines the breakdown by specific type of private sector organisation. The targets were monitored but not enforced during fieldwork.

Table 3.3 Achieved sample of data controllers – private business sector split

Private business sector	n	Target
	1,765	1,750
A Agriculture, Forestry and Fishing	32	26
B,D,E Mining and Quarrying; Electricity, Gas and Air Conditioning Supply; Water Supply; Sewerage, Waste Management and Remediation Activities	15	10
C Manufacturing	77	78
F Construction	178	255
G Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	156	125
H Transportation and Storage	102	85
I Accommodation and Food Service Activities	88	66
J Information and Communication	145	94
K Financial and Insurance Activities	109	42
L Real Estate Activities	64	59
M Professional, Scientific and Technical Activities	261	282
N Administrative and Support Service Activities	58	148
P Education	98	115
Q Human Health and Social Work Activities	73	134
R Arts, Entertainment and Recreation	118	112
S Other Service Activities	116	119
Not classified	74	

Notes on handling of raw data

Approach to back-coding

In some questions organisations were able to specify responses using open text boxes, commonly labelled as 'Other'. Where respondents enter verbatim responses into 'Other specify' and these were relevant to the existing response codes, available in the question originally, the IFF's coding team would back-code them into an existing code in the list. An example is laid out below:

Question: C2 And which of the following services do you provide online in the UK?

Possible answer codes in the questionnaire:

- Online marketplace for third party goods/services
- Online gaming / streaming
- Music and video streaming
- Social media services
- Online messaging or voice telephony service
- News / education websites / subscription services
- Educational Technology
- Electronic services controlling connected toys and other connected devices
- Preventative / counselling services
- Other (please specify)
- None of these services
- Don't know

Table 3.4 Example of 'other specify' responses at C2 and where they were coded during analysis

Other specify response	Back-coded or new code	Response coded to in analysis
'Online learning platform'	Back-coded into existing answer code	Education technology
'Bookable tennis courts via third party'	Back-coded into existing answer code	Online marketplace for third party goods / services

This coding approach ensures maximum insight and reduces the proportion of responses that sit in 'other'. However, in some instances, the back coding that takes place at the data production and analysis phase can impact follow-up questions due to routing that takes place during the fieldwork, meaning base sizes of these follow-up questions look incorrect.

Rather than making manual edits it was agreed to keep the total number of organisations who answered the question in the data as they were captured 'live' accepting that there will be a handful of discrepancies in the total base size for some questions.

- This impacts the **statements at E3** (Have you considered using any of the following technologies to help with processing personal data, but ultimately not used the technology?) in the data controllers survey.

- The statements at E3 are presented to those who **did not select the named technology at E2**. However, a small number of respondents did not select the named technology but were **back-coded to the relevant technology based on their response in 'other'**. This means they should not have been asked the follow up question E3 but were due to their original response, given before coding was completed. Their original response at E3 was retained to avoid manual edits. This leads to small discrepancies in the base size relating to consideration to use the technology at question E3. Table 3.6 below shows that these discrepancies are prevalent at E3_4 (Facial or biometric recognition technology), E3_6 (Physical Data Server), E3_7 (Encryption), E3_8 (Software / hardware for managing Data Protection compliance) and E3_10 (Cloud Processing Facilities).

Table 3.5 Data inconsistencies at E3 due to back-coding

Statement at E2/E3	Number of respondents who said they did not use the technology at E2 (routed to E3)	Number of respondents who selected "other" at E2 and were then back coded to the technology (were routed to E3)	Final base of respondents that did not use each technology E2 (following back coding)	Number of respondents who were presented E3 on the assumption that they didn't use the technology	Discrepancy present in the data
1_ AI decision making systems / Artificial intelligence as a service (AIaaS)	1,967	3	1,964	1,967	Yes
2_Anonymisation technology / processes	2,068	1	2,067	2,068	Yes
3_Pseudonymisation technology / processes	2,184	0	2,184	2,184	No
4_Facial or biometric recognition technology	2,102	0	2,102	2,102	No

5_Cloud storage	1,156	2	1,154	1,156	Yes
6_Physical data server	1,680	12	1,668	1,680	Yes
7_Encryption	1,581	1	1,580	1,581	Yes
8_Software/hardware for managing Data Protection compliance	1,564	35	1,529	1,564	Yes
9_Statistical Analysis Tools	1,996	0	1,996	1,996	No
10_Cloud Processing Facilities	1,868	0	1,868	1,868	No

- The number of responses in 'Other privacy enhancing technology (please specify)' in E2 reduced once back-coding was completed to the technologies in the above list. Thus, having the opposite effect as the above list on E3. The proportion those who did **not** select this increased rather than decreased and therefore the proportion that were asked the follow up at E3 is lower than might be assumed from looking at the data. This had a knock-on impact on the base size of E3 for whether they had considered an 'Other privacy enhancing technology'. The base size for E3_11 'Other privacy enhancing technology' is 2208 compared with 2321 that did not select other (following back coding). A consistent approach was taken to data production here as in Year 1 and Year 2.

Inconsistency in responses in questions B7 and F10

- During analysis of Year 1 responses it was noted that contradictory answers were given by some respondents for questions B7 'Approximately how many people does your organisation employ, excluding yourself?' and F10 'How many employees, including yourself, have at least some responsibility for managing Data Protection compliance in your organisation over the past 12 months?'

Some respondents indicated that more employees were responsible for managing Data Protection compliance than worked at their organisation, which may not be reasonable for all organisations. In the second-year survey we have introduced a question at F11 to capture responses that were inconsistent.

F11 Earlier in the survey you said that your business / organisation had [B7 RESPONSE], however in the most recent question you said that [F10 RESPONSES] had at least some responsibility for managing data protection compliance in your organisation over the past 12 months. Can you confirm both these figures are correct?

MULTI CODE

	F11_1 Yes, this figure is correct	F11_2 This figure is incorrect
F11_1 Number of employees	142	30
F11_2 Number of employees responsible for managing data protection compliance	156	18

In total 172 organisations were referred to question F11 and the majority (142) maintained that their original response was correct. 30 corrected their number of employees and 18 corrected the number of employees responsible for managing data protection compliance.

Where organisations corrected their number of employees, their response at B7 was edited to allocate them to the correct size band. This also impacted where they fell in the overall target grid by organisation type and size (as specified in Table 3.3).

The specific changes are outlined in Table 3.7. As can be seen the majority of changes came from the 0-1 size group (19), while there was one change from the 10-49 group.

Table 3.6 Change in organisation size when clarified at F10

Size of organisation		F10 response (banded)					
		0-1 employees	2-9 employees	10-49 employees	50-249 employees	250+	Total
B7 response	0-1 employees	-	16	2	1		19
	2-9 employees		-				0
	10-49 employees			-	1		1
	50-249 employees				-	0	0
	250+					-	0
	Total	0	15	3	2	0	20

Where organisations corrected the number of employees responsible for data protection compliance, a total of 30 organisations initially stated that the number they had previously given needed updating. The data was edited as below:

- 10 organisations gave the same number of employees responsible for data protection compliance as they originally stated. For these records, they were amended to state 'Yes – this figure is correct' at F11.

- 30 organisations gave a different response so their initial response at F10 was amended in line with their response at F11.

Qualitative Interviews

As part of the research in order to gather further insight, 20 qualitative interviews were carried out between 20th January 2026 and 21st February 2026. Each interview fed into individual case studies and were conducted with sole trader or micro private sector organisations which indicated from the survey that they had little knowledge of the ICO and how it worked.

The 20 interviews were conducted by members of the IFF research team, as well as two experienced qualitative specialists, and were split across different quotas, shown in Table 3.6.

Table 3.7Qualitative sample structure by size and type

	Private Sector business
All	20
0 -1 employees	15
Micro (2-9 employees)	5

4 Weighting

As the achieved sample was not representative of the population it was necessary to use the population weights to provide representative sample statistical estimates by organisation size and type. The weighting approach described has allowed us to produce statistics which better represent the overall population of data controllers.

The complete dataset was weighted to match the full population of data controllers by organisation size and organisation type as set out in the population estimates section earlier in this report. Table 4.1 outlines the proportion of the population for each combination of organisation size by organisation type.

Table 4.1 Population of data controllers by organisation size and organisation type (also shown in Table 2.2 in chapter 2 of this report)

	All	Private Sector Business	Public sector organisation	Non-profit organisation
All	100%	97.175%	0.367%	2.458%
0 -1 employees	73.204%	72.229%	0.149%	0.826%
Micro (2-9 employees)	19.807%	18.659%	0.070%	1.078%
Small (10-49 employees)	5.541%	5.083%	0.037%	0.421%
Medium (50-249 employees)	1.141%	0.986%	0.054%	0.101%
Large (250+ employees)	0.307%	0.218%	0.057%	0.032%

These weights can be applied to the sample response values within each of the size-type categories. The values, such as the percentage of respondents strongly agreeing with a statement are calculated for responses within each size and type category, for example the proportion of responders within a size-type category who are aware of the ICO, is weighted using the weights above for the same size and type category to form a population estimate. That is:

$$\bar{P} = \sum_{i=1}^{3} \sum_{j=1}^{5} P_{ij} \bar{S}_{ij}$$

Where $\bar{S}_{ij}$ is the response score/average for the i-j cell.

Pij is the population weight for i j category.

It is useful to note that there are two weight levels, and we can use either to produce summary statistics for either a given organisation size across the three sectors, or sector across the five organisation sizes. Applying both, as in the equation above yields the estimated population measure.

Weighting can also be achieved on an individual response level. The weighting was applied by IFF's Data Services team, with each individual response allocated a weight, taking into account the number of surveys completed by the organisation size-type against the proportion identified in the population. Every record in the same size and type category is applied the same individual weight, and these weights are shown in Table 4.2. Either of the approaches described here are equivalent and the two accomplish the same calculations at the population level.

Table 4.2 The weight applied to every individual record within each cell

	Private Sector Business	Public sector organisation	Non-profit organisation
0 -1 employees	1.535682469	0.063666687	0.292670813
Micro (2-9 employees)	0.974126173	0.02814738	0.458400046
Small (10-49 employees)	0.938611045	0.015538991	0.192528038
Medium (50-249 employees)	0.435480046	0.022920010	0.045840017
Large (250+ employees)	0.069396688	0.027504012	0.018094745

These weights are calculated using the formula below:

$$W_{ij} = \frac{\tilde{P}_{ij}}{S_{ij}}$$

Where $\tilde{P}_{ij}$ is the population proportion for the i-j size and organisation type and S_{ij} is the proportion of the total sample for the same combination.

For example, private sector businesses, 0-1 employees[11]:

$$\frac{73.2}{46.8} = 1.51$$

As the weighting is applied at an individual level, where tables are filtered on a particular base (e.g. those who offer online products), the findings will represent the population within that subgroup.

For questions which target a subgroup of the population the weighting applied to the relevant records rescales the proportions to reflect the composition subgroup population.

[11] There is some slight rounding here in the two proportions used.

5 Limitations

Outline of caveats and limitations to the method

There can be confidence in the approach as a significant number of interviews were achieved to ensure robustness. The findings are representative as they were weighted to represent the population of data controllers. However, it is worth noting some limitations to ensure appropriate use of the findings.

While the survey questions were designed to be administered both over the phone and online, there remains some risk of modal completion bias.

The use of panel providers for the online survey was highlighted as a limitation due to having less control over who completed the survey. Therefore, a mixed mode of completion was used to ensure a significant (1,250) number of interviews were conducted over the telephone to provide mitigation for this limitation. Strict screening criteria were applied to reach the right person within organisations and post-fieldwork QA checks mitigated this risk, though it is impossible to remove it entirely.

A quota sampling approach carries more risk of survey bias than a pure random probability approach to sampling. However, this method was considered to be appropriate to meet the budgetary and timescale requirements. As the largest businesses represent a very small proportion of the data controller's population, once weighted, the data is subject to design effect. Design effect refers to the total sample divided by the effective sample size, the closer to 1 this is, the smaller the design effect and therefore more robust the achieved sample is. Similarly, the higher the effective sample size, which refers to the total sample size once weighting has been applied, the more robust the achieved sample is. The effective sample size for this study is 1,709 (compared with 2,292 achieved interviews), with a design effect of 1.34. The design effect is calculated by dividing the effective sample size by the number of achieved interviews. Therefore, overall, the effective sample size is robust (despite being lower than the achieved sample size).

As this is a sample survey there remains an issue relating to sampling error and there are three known sources of this: the answers to this survey, the business population estimates and the sample error relating to the Business Data Survey estimates. As a result, there will be a complex, compound error resulting from the interaction of these three sources of error. The estimation of such errors is beyond the scope of this work, however those making use of the results should be aware of its existence and potential impact.

Annex A – ICO Data Controllers questionnaire

S Screener - Telephone

ASK ALL

S1 **Good morning / afternoon. My name is NAME, calling on behalf of the Information Commissioners Office (ICO). I am looking to speak to the person who has responsibility for the processing of personal data in your business/organisation please?**

ADD IF NECESSARY: THIS MAY INCLUDE THE OWNER, MANAGING DIRECTOR, FINANCIAL DIRECTOR, SENIOR DIRECTORS, INFORMATION OFFICER, COMPLIANCE OFFICER, DATA PROTECTION OFFICER (CHOOSE APPROPRIATE, DON'T SUGGEST ALL)

ADD IF NECESSARY: THIS IS NOT A COMPLIANCE EXERCISE

SINGLE CODE.

Respondent answers phone	2	CONTINUE
Transferred to respondent	3	
Hard appointment	4	MAKE APPOINTMENT
Soft Appointment	5	
Engaged	6	CALL BACK
No reply / Answer phone	7	
Refusal	8	THANK AND CLOSE
Not available in deadline	9	
No reply / Answerphone	10	
Dead line	11	
Company closed	12	
Request reassurance email	13	COLLECT EMAIL ADDRESS THEN CONTINUE OR MAKE APPOINTMENT
Refer to someone else at establishment/organisation	14	TRANSFER AND RE-INTRODUCE COLLECT NAME AND EMAIL ADDRESS

ASK IF S1=1/2

S2 Good morning/afternoon. My name is NAME, calling on behalf of the Information Commissioners Office (ICO) from IFF Research.

The reason for my call today is we are supporting the ICO with research to improve understanding of data processing activities, interaction with the data protection regulation & use of relevant technologies.

Your views are important to us & participation is entirely anonymous. It only takes 20 minutes & by taking part you could help improve & influence future experiences. It would be helpful if we could run through these questions now if possible, please?

ADD IF NECESSARY: A DATA CONTROLLER CAN BE LIMITED COMPANIES, ORGANISATIONS, CHARITIES, PUBLIC AUTHORITIES, ASSOCIATIONS, OR BUSINESSES OF ANY SIZE, INCLUDING SOLE TRADERS, WHO MAKE DECISIONS ABOUT HOW PEOPLE'S PERSONAL INFORMATION IS HANDLED, AND HOW IT IS KEPT SAFE WITHIN THE CONDUCT OF THEIR ACTIVITIES.

SINGLE CODE.

Willing to take part	1	CONTINUE
Hard appointment	2	MAKE APPOINTMENT
Soft Appointment	3	
Engaged / No reply / Answer phone	4	CALL BACK
Refusal	5	THANK AND CLOSE
Not available in deadline	6	
Request reassurance email	7	COLLECT EMAIL ADDRESS THEN CONTINUE OR MAKE APPOINTMENT

READ OUT TO ALL

S3 Before we begin, I need to read out a quick statement regarding GDPR legislation:

All information collected in this survey will be treated in the strictest confidence. You have the right to a copy of your data, to change your data or to withdraw from the research. If you'd like to do this or find out more, you can consult our website at iffresearch.com/gdpr. Any identifiable information will be kept securely on our servers and deleted within 12 months after the completion of the project, which will be no later than December 2026. As part of our quality control procedures, all interviews are recorded. Is that OK?

ADD IF NECESSARY: IFF holds ISO/IEC 27001:2013 certification (the international standard for information security) as well as UK Cyber Essentials Plus

SINGLE CODE.

Yes – agree to continue	1	
Refuse to continue	2	THANK AND CLOSE

REASSURANCES TO USE IF NECESSARY

The interview will take around 20 minutes to complete.

Please note that all data will be reported in aggregate form and your answers will not be reported to the ICO in any way that would allow you to be identified.

IFF holds ISO/IEC 27001:2013 certification (the international standard for information security) as well as UK Cyber Essentials Plus.

If respondent wishes to confirm validity of survey or get more information about aims and objectives, they can call:

- **MRS: Market Research Society on 0800 975 9596**
- **IFF: Chelsea Wells at IFFdatacontrollerssurvey@IFFresearch.com or on 0800 804 8039**
- **ICO: datacontrollersstudy@ico.org.uk**

A Landing page - Online

DISPLAY TO ALL

A2 **Welcome to the ICO data controllers survey.**

We are conducting a survey on behalf of the Information Commissioners Office (ICO). The purpose of the survey is to improve understanding of data controllers' personal data processing activities, use of relevant technologies, and interaction with the data protection regulation. We would like to hear from the person who has responsibility for the processing of personal data in your business/organisation.

DS INSTRUCTION: ADD DEFINITION FOR DATA CONTROLLERS WHEN USER HOVERS OVER THE TEXT.

DATA CONTROLLER: DATA CONTROLLERS CAN BE LIMITED COMPANIES, ORGANISATIONS, CHARITIES, PUBLIC AUTHORITIES, ASSOCIATIONS, OR BUSINESSES OF ANY SIZE, INCLUDING SOLE TRADERS, WHO MAKE DECISIONS ABOUT HOW PEOPLE'S PERSONAL INFORMATION IS HANDLED, AND HOW IT IS KEPT SAFE WITHIN THE CONDUCT OF THEIR ACTIVITIES.

We would like to reassure you that participation is entirely anonymous and the ICO will not know who is taking part in the survey.

The survey should take around 20 minutes to complete.

When completing the survey, please only use the 'next' button on the page, rather than the 'back' and 'forward' buttons in your browser.

You can pause the survey at any time by clicking on the pause symbol at the bottom of the screen and can re-enter by clicking on the link again. You can come back to it at any time.

SINGLE CODE.

Click here to complete the survey	1	CONTINUE
Click here if you do not want to complete the survey	2	THANK AND CLOSE

IF CLICKS 'HERE' FOR MORE INFORMATION

How do I complete the survey?

When completing the survey, please only use the 'next' button on the page rather than the 'back' and 'forward' buttons in your browser.

If you need to exit the survey, you can come back to it to continue your answers from where you left off at a later stage by clicking on the original link we sent you.

Please don't share this link with anyone else as it is your own unique survey invitation.

How will my answers be used?

certification (the international standard for information security) as well as UK Cyber Essentials Plus. If you would like to know more about IFF Research and our GDPR policy, you can visit our website: www.iffresearch.com.

If you do take part in the survey, your responses will be treated in the strictest confidence. Results from the survey will be reported to the ICO in an anonymised and aggregated format so they cannot be linked to you. IFF will not disclose who has taken part in the survey and responses will be used for research purposes only.

Where can I find out more information?

If you would like more information about the aims and objectives of the research, you can contact:

- **IFF Research:** Chelsea Wells at IFFdatacontrollerssurvey@IFFresearch.com or on 0800 804 8039.
- **ICO: datacontrollersstudy@ico.org.uk**
- **The Market Research Society** on 0800 975 9596 (they will be able to confirm that IFF is a genuine market research agency).

B Main Screening

We'd like to start by asking you some questions about your business/organisation, to help with our analysis.

ASK ALL

B1 **Does your organisation collect, process or store personal data, other than for personnel, HR or related purposes?**

By personal data we mean any information relating to a customer or member of the public such as a name, address, telephone number, or any other personal information.

Examples of how this might be used include marketing, creating customer profiles, web analytics and monitoring.

SINGLE CODE.

Yes	1	
No	2	THANK AND CLOSE
Don't know	3	THANK AND CLOSE

ASK ALL

B2 **Which of the following best describes your organisation?**

SINGLE CODE. READ OUT.

Private sector business	1	
Public sector organisation, including central and local government	2	
Non-profit / society / charity organisation	3	
Don't know	4	

ASK IF B2=2

B2a **Which of the following best describes your public sector organisation?**

SINGLE CODE. READ OUT.

Local government organisation (county council, district council, unitary authority, metropolitan district, London boroughs etc.)	1	
Central government department	2	

Organisations in the health sector (CCG, NHS Trusts and Foundation Trust, GP surgery etc.)	3	
Organisations in the Justice sector (Policing, Parole Boards, Tribunals etc.)	4	
Organisations in the education sector (FE institutions, Secondary Schools, Primary Schools, Exam Boards etc.)	5	
Other public authorities (Arts councils, regulators, executive agencies etc.)	6	
Don't know	7	

ASK IF B2=3

B3b **Which of the following classifications best describes the work of your non-profit / society / charity organisation?**

SINGLE CODE. READ OUT.

Culture and recreation	1	
Education and research	2	
Health	3	
Social services	4	
Environment	5	
Development and housing	6	
Law, advocacy and politics	7	
Philanthropic intermediaries and voluntarism promotion	8	
International	9	
Religion	10	
Business and professional associations, unions	11	
Other (please specify)	12	
Don't know	13	

ASK IF B2=1 AND ROUTE = WEB

B4 **Which of the following industry classifications best describes the primary sector your business/organisation operates in?**

SINGLE CODE.

A Agriculture, Forestry and Fishing	1	
B,D,E Mining and Quarrying; Electricity, Gas and Air Conditioning Supply; Water Supply; Sewerage, Waste Management and Remediation Activities	2	
C Manufacturing	3	
F Construction	4	
G Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	5	
H Transportation and Storage	6	
I Accommodation and Food Service Activities	7	
J Information and Communication	8	
K Financial and Insurance Activities	9	
L Real Estate Activities	10	
M Professional, Scientific and Technical Activities	11	
N Administrative and Support Service Activities	12	
P Education	13	
Q Human Health and Social Work Activities	14	
R Arts, Entertainment and Recreation	15	
S Other Service Activities	16	
Don't know	17	
None of these	18	
Refused	19	

ASK CATI ONLY

B5 I have [READ OUT SECTOR DESCRIPTION FROM SAMPLE] as a general description of your business' principal activity. Bearing in mind this is a general description only, does this sound correct?

SINGLE CODE

Yes	1	

No	2	
Don't know	3	

IF DISAGREE WITH SAMPLE SECTOR (B5=2/3) and route = cati

B6 What is the main activity of your business or organisation?

INTERVIEWER PROBE FOR THE FOLLOWING - START WITH FIRST PROBE AND ONLY USE THE OTHERS IF NECESSARY TO GET CLEAR INFORMATION

What is the main product or service of this establishment?

What exactly is made or done at this establishment?

WRITE IN. TO BE CODED TO 4 DIGIT SIC 2007.

ASK ALL

B7 Approximately how many people does your organisation employ, excluding yourself?
SINGLE CODE.

PROMPT IF NECESSARY

0-1 employees	1	
2-9 employees	2	
10-49 employees	3	
50-249 employees	4	
250+ employees	5	
Don't know	6	
Refused	7	

C Data controller background

Now we'd like to ask you about the services your business/organisation provides.

ASK ALL

C1 **Does your organisation provide an online or internet enabled service or product?**

ADD IF NECESSARY: BY PRODUCT WE MEAN AN ITEM, DIGITAL OR PHYSICAL, THAT YOU SEND TO CUSTOMERS. BY SERVICE WE MEAN WHERE YOU OFFER TO DO WORK FOR THE CUSTOMER.

SINGLE CODE.

Yes – products	1	
Yes – services	2	
Yes – both products and services	3	
No	4	
Don't know	5	

ASK IF C1=2,3

C2 **And which of the following services do you provide online in the UK?**

MULTICODE. READ OUT.

Online marketplace for third party goods/services	1	
Online gaming / streaming	2	
Music and video streaming	3	
Social media services	4	
Online messaging or voice telephony service	5	
News / education websites / subscription services	6	
Educational Technology	7	
Electronic services controlling connected toys and other connected devices	8	
Preventative / counselling services	9	
Other (please specify)	10	
None of these services	11	

Don't know	12	

ASK IF C1=1,2,3

C3 **Is the revenue you generate from the delivery of online, or internet-enabled, products/services received through…?**

SINGLE CODE. READ OUT.

Direct payment or subscription from customers	1	
Generating money from user's data (e.g. through advertising)	2	
Both	3	
We don't generate revenue	4	
Don't know	5	

ASK ALL

C4 **Is any of the personal data your organisation processes, other than for personnel, HR or related purposes, stored digitally?**

SINGLE CODE. DO NOT READ OUT

Yes	1	
No, all data is held physically	2	
Don't know	3	

D Personal data processing activities

The following questions refer to use and processing of personal data and exclude employee or HR data.

ASK ALL

D1 **How does your business/organisation acquire, receive or collect personal data?**

SELECT ALL THAT APPLY. DS INSTRUCTION: PROVIDE A DEFINITION OF PERSONAL DATA WHENEVER USER HOVERS OVER THE TEXT

PERSONAL DATA: ANY INFORMATION RELATING TO A CUSTOMER OR MEMBER OF THE PUBLIC SUCH AS A NAME, ADDRESS, TELEPHONE NUMBER, OR ANY OTHER PERSONAL INFORMATION.

MULTICODE. READ OUT.

Directly from customers/public, online or offline, through offering your own products or services (for example, collected from own website/app)	1	
Using Cookies or similar online tracking technologies	2	
Using different types of data intermediaries (for example, tech platforms, data brokers)	3	
From other businesses or organisations, in the course of providing your products or services	4	
From publicly available databases	5	
From international sources	6	
Other (please specify)	7	
Don't know	8	

ASK ALL

D2 **What was the volume of personal data that you processed in the last 12 months, i.e. how many people do you think your business/organisation handled personal data for (excluding staff or employees)?**

An approximate estimate is fine if you don't know the exact figure.

SINGLE CODE. READ OUT.

Less than 100	1	
100 to 999	2	
1,000 up to 9,999	3	

10,000 up to 49,999	4	
50,000 up to 99,999	5	
100,000 up to 499,999	6	
500,000 up to 2 million	7	
Over 2 million up to, but less than, 10 million	8	
More than 10 million	9	
Don't know	10	

ASK ALL

D3 **To what extent is your business/organisation dependent on processing personal data (belonging to people that aren't staff or employees) in providing its goods or services?**

MULTICODE OK 1-2. READ OUT

Essential to core functions of my business/organisational model	1	
Essential for supporting functions within my business/organisation (for example, accounting, invoicing and compliance)	2	
Useful but not necessary for my business/organisation	3	EXCLUSIVE
Not very important for any of the functions in my business/organisation	4	EXCLUSIVE
Don't know	5	EXCLUSIVE

ASK ALL

D4 **Does your organisation process any sensitive personal data?**
DS INSTRUCTION: PROVIDE A DEFINITION OF PROCESS AND SENSITIVE WHEN USER HOVERS OVER THE TEXT.

DATA PROCESSING: DATA PROCESSING IS THE COLLECTION AND MANIPULATION OF DIGITAL DATA TO PRODUCE MEANINGFUL INFORMATION.

SENSITIVE DATA: SENSITIVE PERSONAL DATA, WHICH ALSO INCLUDES SPECIAL CATEGORY DATA, IS A SPECIFIC SET OF CHARACTERISTICS INCLUDED IN THE EQUALITY ACT, FOR EXAMPLE, RACE, RELIGION, SEXUAL ORIENTATION, THAT MUST BE TREATED WITH EXTRA SECURITY.

SINGLE CODE. DO NOT READ OUT.

Yes	1	
No	2	

Don't know	3	

ASK IF D4=1

D5 **What type(s), if any, of sensitive personal data does your organisation process?**

MULTICODE. READ OUT.

Children and young people's data (personal data for under 18s)	1	
Data classified as 'Special Category' these include ethnic background, political, religious or philosophical beliefs, trade union membership, genetic, biometric or health data, and sexual orientation	2	
Criminal convictions & offences data	3	
Other (please specify)	4	
None	5	EXCLUSIVE
Don't know	6	

ASK ALL

D6 **D6a For what purposes does your business/organisation process the personal data you collect or acquire?**

PLEASE SELECT ALL THAT APPLY

MULTICODE. READ OUT. RANDOMISE.

Web analytics	1
Product/service analytics necessary to deliver your core product / service offer ('service' also applies to public organisations, charities, etc.)	2
Insights for online and offline advertising	3
Supply chain efficiency	4
Direct Marketing	5
Customer research	6
Product development/innovation	7
Internal research	8

Regulatory and/or statutory requirements	9
Responding to requests from government authorities such as law enforcement	10
Sell/ trade data to other businesses or organisations	11
Other (please specify)	12
Don't know	13

ASK IF ANY SELECTED AT D6A (D6A=1-11)

D6b [IF CATI: Thinking about the same complete list, IF WEB: And] were any of these uses innovative for your business/organisation in the last 12 months?

IF NECESSARY: Innovation is the process of creating and implementing new ideas, products, services, or processes that add value, enhance efficiency, or drive competitive advantage.

PLEASE SELECT ALL THAT APPLY. READ OUT.

DS: ONLY SHOW THOSE SELECTED AT D6A

Web analytics	1
Product/service analytics necessary to deliver your core product / service offer ('service' also applies to public organisations, charities, etc.)	2
Insights for online and offline advertising	3
Supply chain efficiency	4
Direct Marketing	5
Customer research	6
Product development/innovation	7
Internal research	8
Regulatory and/or statutory requirements	9
Responding to requests from government authorities such as law enforcement	10
Sell/ trade data to other businesses or organisations	11
Other (DS PIPE IN SPECIFY RESPONSE FROM D6A)	12
Don't know	13
None of the above	14

ASK ALL

D7 **Does your business share personal data outside of your organisation?**

SINGLE CODE. DO NOT READ OUT.

Yes	1	
No	2	
Don't know	3	

ASK IF D7=1 (YES)

D8 **What parties does your business/organisation share data with?**

MULTICODE. READ OUT.

Data intermediaries	1	
Other businesses or organisations	2	
Other branches of your own business or corporate group or associated organisations	3	
Employees	4	
Customers, stakeholders	5	
Public bodies, such as government departments, HMRC, NHS, etc.	6	
Charities or non-profit organisations	7	
Academic and research organisations	8	
Others (please specify)	9	
Don't know	10	EXCLUSIVE

ASK ALL

D9 **Does your business share special category / sensitive personal data?**
DS INSTRUCTION: PROVIDE A DEFINITION OF SENSITIVE PERSONAL DATA WHEN USER HOVERS OVER THE TEXT.

SENSITIVE DATA: SENSITIVE PERSONAL DATA, WHICH INCLUDES SPECIAL CATEGORY DATA, IS A SPECIFIC SET OF "SPECIAL CATEGORIES" THAT MUST BE TREATED WITH EXTRA SECURITY.

SINGLE CODE. DO NOT READ OUT.

Yes	1	
No	2	
Don't know	3	

ASK IF D9=1 (YES)

D10 **What parties does your business/organisation share special category / sensitive personal data with?**

MULTICODE. READ OUT.

Data intermediaries	1	
Other businesses or organisations	2	
Other branches of your own business or corporate group or associated organisations	3	
Employees	4	
Customers, stakeholders	5	
Public bodies, such as government departments, HMRC, NHS, etc.	6	
Charities or non-profit organisations	7	
Academic and research organisations	8	
Others (please specify)	9	
Don't know	10	

ASK ALL

D11 **Does your business/organisation share UK residents' personal data internationally?**

SINGLE CODE. DO NOT READ OUT.

Yes	1	
No	2	
Don't know	3	

ASK IF D11=1 (YES)

D12 **Where does your business/organisation share UK residents personal data internationally?**

EU COUNTRIES ARE: AUSTRIA, BELGIUM, BULGARIA, CROATIA, REPUBLIC OF CYPRUS, CZECHIA, DENMARK, ESTONIA, FINLAND, FRANCE, GERMANY, GREECE, HUNGARY, IRELAND, ITALY, LATVIA, LITHUANIA, LUXEMBOURG, MALTA, NETHERLANDS, POLAND, PORTUGAL, ROMANIA, SLOVAKIA, SLOVENIA, SPAIN AND SWEDEN.

MULTICODE. DO NOT READ OUT.

EU	1	
USA	2	
REST OF THE WORLD	3	
DON'T KNOW	4	EXCLUSIVE

ASK IF D12=3

D13 **Which countries does this include?**
This list does not include EU countries. If you share data with an EU country that is not on this list please ensure that you have selected EU at the previous question.

DS INSTRUCTION: PROVIDE DROP DOWN LIST OF COUNTRIES

MULTI CODE. DO NOT READ OUT

	1	
Don't know	2	

E Technology and innovation

Now we'd like to discuss the technologies you use when processing personal data.

ASK ALL

E1 **Which of the following best describes how your organisation manages its IT functions?**

SINGLE CODE. READ OUT.

In-House: All IT functions are performed by internal staff	1	
Outsourced: All IT functions are contracted to external service providers	2	
Hybrid: Some IT functions are performed in-house, while others are outsourced to external service providers	3	
Don't know	4	
None of the above	5	exclusive

ASK ALL

E2 **When you are processing personal data, do you use any of the following technologies?**
PLEASE SELECT ALL THAT APPLY

DS INSTRUCTION: PROVIDE DEFINITIONS BELOW WHEN USER HOVERS OVER THE TEXT

ARTIFICIAL INTELLIGENCE AS A SERVICE: ARTIFICIAL INTELLIGENCE AS A SERVICE, OR AIAAS, IS AN OUTSOURCED SERVICE MODEL AI THAT CLOUD-BASED COMPANIES PROVIDE TO OTHER BUSINESSES, GIVING THEM ACCESS TO DIFFERENT AI MODELS, ALGORITHMS, AND OTHER RESOURCES DIRECTLY THROUGH A CLOUD COMPUTING PLATFORM

MULTICODE. READ OUT.

	Yes	
1_ AI decision making systems / Artificial intelligence as a service (AIaaS)	1	
2_Anonymisation technology / processes	2	
3_Pseudonymisation technology / processes	3	
4_Facial or biometric recognition technology	4	
5_Cloud storage	5	
6_Physical data server	6	

7_Encryption	7	
8_Software/hardware for managing Data Protection compliance	8	
9_Statistical Analysis Tools	9	
10_Cloud Processing Facilities	10	
11_Other privacy enhancing technology (please specify)	11	
12_Don't know	12	
13_ We do not use any digital technologies as all data is held physically.	13	EXCLUSIVE

ASK ALL

E3 **Have you considered using any of the following technologies to help with processing personal data, but ultimately not used the technology?**
DS INSTRUCTION: ONLY PIPE THROUGH OPTIONS USERS HAVE NOT SELECTED AS PART OF E2.

SINGLE CODE PER ROW. READ OUT.

	Yes	No	Don't Know
1_AI decision making systems / AIaaS	1	2	3
2_Anonymisation technology / processes	1	2	3
3_Pseudonymisation technology / processes	1	2	3
4_Facial or biometric recognition technology	1	2	3
5_Cloud storage	1	2	3
6_Physical data server	1	2	3
7_Encryption	1	2	3
8_Software/hardware for managing Data Protection compliance	1	2	3
9_Statistical Analysis Tools	1	2	3
10_Cloud Processing Facilities	1	2	3
11_Other privacy enhancing technology	1	2	3

ASK IF THEY HAD CONSIDERED ADOPTING ANY TECHNOLOGIES (E3_1-12=1)

E4 **Where you have considered but ultimately did not use any of the technology(ies) in the previous question, which of the following were factors in your decision not to use the technology(ies) in question?**

MULTICODE. READ OUT.

High cost of the technology	1	
No time to implement	2	
Lack of expertise / staff training required	3	
Ultimately saw no need	4	
Effort required in understanding compliance requirements (i.e. time spent reading guidance)	5	
Legislative requirements (e.g. GDPR)	6	
Other (please specify)	7	
Don't know	8	

ASK ALL

E6 **Overall, how familiar would you say you are personally with Data Protection law?**

SINGLE CODE. READ OUT.

Very familiar	1	
Fairly familiar	2	
Not very familiar	3	
Not at all familiar	4	
Don't know	5	

ASK ALL

E5 **To what extent do you agree with the following statements in relation to your core activities over the past 12 months?**

SINGLE CODE PER ROW. READ OUT.

	Strongly agree				Strongly disagree	Don't Know
_1 Data protection law has provided clarity on the types of innovation that are compliant with personal data protection	1	2	3	4	5	6
_2 Data protection law has revealed data security and compliance gaps that we are addressing	1	2	3	4	5	6
_3 Data protection law has identified new uses of personal data to improve or expand our existing goods or services	1	2	3	4	5	6
_4 Data protection law has helped to identify, use and store personal data more efficiently and at a lower cost	1	2	3	4	5	6
_5 Data protection law has helped identify new processes to assist with innovating responsibly	1	2	3	4	5	6

ASK ALL

E7 **To what extent do you agree or disagree that data protection laws have been an enabler that have positively influenced you undertaking your core activities over the past 12 months?**

SINGLE CODE. READ OUT.

Strongly agree	1	
Tend to agree	2	
Neither agree nor disagree	3	
Tend to disagree	4	
Strongly disagree	5	
Don’t know	6	

ASK ALL

E8 **To what extent have data protection laws placed constraints on your core activities in the last 12 months?**

SINGLE CODE. READ OUT.

To a very large extent	1	
To a large extent	2	
To some extent	3	
To little extent	4	

To no extent	5	
Don't know	6	

ASK E8=1,2,3,4

E9 **What are the constraints that data protection laws have placed on your core activities?**
PLEASE SELECT ALL THAT APPLY

MULTICODE. READ OUT.

Unable to implement new or improved product or business model	1	
Uncertainty about adopting an innovative product or service with unclear compliance assurance	2	
Costs involved with DP compliance too high	3	
Lack of clarity about data protection law requirements	4	
It has identified new processes that restrict innovation	5	
It has made trading with other businesses challenging	6	
Other (please specify)	7	
Don't know	8	EXCLUSIVE

F Regulation and the ICO

Finally we'd like to ask you some questions about your relationship with the Information Commissioner's Office and data protection regulation.

ASK ALL

F1 **To what extent would you agree with the following statements?**

SINGLE CODE. READ OUT.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
1_ Before completing this survey, I was aware of the ICO and its work	1	2	3	4	5	6

ASK IF F1=1-2

F2 **To what extent do you agree with the following statements?**

SINGLE CODE PER ROW. READ OUT.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
1_ The ICO resources provide clarity about what the law requires	1	2	3	4	5	6
3_ The ICO understands the issues you face	1	2	3	4	5	6
4_ The ICO understands and anticipates developments in the markets it regulates	1	2	3	4	5	6
5_ The work of the ICO, for example the Business Advice Service and Certification Schemes, reduces your compliance costs	1	2	3	4	5	6

ASK F1=1-2

F3 **Which of the following ICO material or services has your business/organisation used in order to comply with data protection regulations in the past 12 months?**
PLEASE SELECT ALL THAT APPLY

MULTICODE. READ OUT.

Called the ICO to lay a complaint	1	
Accessed, read or used ICO guidance to improve understanding with UK GDPR, PECR, FOIA, EIR, and NIS	2	
Accessed, read or used ICO guidance to improve understanding of compliance activities such as ROPA, DPIA	3	
Subscribed to ICO newsletter	4	
Accessed information about the regulatory sandbox	5	
Accessed business advice services	6	
Accessed innovation advice services	7	
Accessed certification scheme	8	
Accessed information about codes of conduct	9	
Accessed guidance and support around children's privacy	10	
Requested an assessment of your data protection service or audit	11	
Accesses SME hub	12	
Reported a breach	13	
Others (please specify)	14	
Don't know	15	EXCLUSIVE
None of these	16	EXCLUSIVE

ASK ALL

F4 **To what extent do you agree or disagree that the following are challenges in processing personal data for your business/organisation?**

SINGLE CODE PER ROW. READ OUT.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Disagree strongly	Don't know
1_ Ensuring personal data is accurate.	1	2	3	4	5	6
2_ Ensuring personal data is not out of date	1	2	3	4	5	6
3_ Ensuring personal data is not easily retrievable/usable by people outside the business or organisation	1	2	3	4	5	6
4_ Cyber security concerns	1	2	3	4	5	6
5_Unauthorised access	1	2	3	4	5	6
6_Human error	1	2	3	4	5	6
7_Intentional non-compliant processing	1	2	3	4	5	6
8_Reducing personal data processing to avoid data subject complaints	1	2	3	4	5	6
9_Lack of clarity about regulatory requirements	1	2	3	4	5	6
10_Difficulties in understanding how to share data with other organisations	1	2	3	4	5	6
11_Lack of expertise in understanding data processing legal requirements	1	2	3	4	5	6
12_Lack of expertise in processing personal data taking into consideration external risks	1	2	3	4	5	6

ASK ALL

F5 **Over the past 12 months have you faced any financial costs in order to comply with UK GDPR?**

SINGLE CODE

Yes	1	
No	2	
Don't know	3	

ASK F5=1

F6 **Which of the following types of costs have you faced in complying with UK GDPR over the past 12 months?**

ADD IF NECESSARY: One-off costs are things your organisation has paid for once, such as buying new software, upgrading IT systems, or hiring a consultant to help with data compliance. Ongoing costs are regular or repeated expenses, like software subscriptions, hiring new staff, or running regular training.

SINGLE CODE

One-off costs	1	
On-going costs	2	
Both	3	

ASK IF F5=1

F7 **Which of the following types of costs have you incurred in complying with UK GDPR?**

PLEASE SELECT ALL THAT APPLY

MULTICODE. READ OUT. RANDOMISE

Existing employee undertaking regulatory compliance work	1	
Existing employee undertaking regulatory compliance training	2	
Data Protection Officer (Newly appointed or existing)	3	
Software	4	
Hardware	5	
Privacy Enhancing Technology	6	
Consulting	7	
ICO data protection registration fees	8	
Responding to Subject Access Request (SARs)	9	
Other (please specify)	10	
Don’t know	11	EXCLUSIVE

ASK IF F5=1

F9 **Approximately, what has been the total cost of complying with UK GDPR regulations?**

SINGLE CODE. PROMPT FINANCIAL BANDS IF NECESSARY.

£1-£999	1	
£1,000-£4,999	2	
£5,000-£9,999	3	
£10,000-£19,999	4	
£20,000-£29,999	5	
£30,000-£39,999	6	
£40,000-£49,999	7	
Over £50,000£99,999	8	
Over £100,000	9	
Don't know	14	
Refused	15	

ASK IF F7=1-10

F9b **Now breaking down this figure of [INSERT BAND AT F9]. In the past 12 months how much did each of the following cost your organisation?**

An approximate estimate is fine if you don't know the exact figure.

DS ONLY SHOW RESPONSES GIVEN AT F7

MULTICODE. READ OUT. RANDOMISE

_1 Existing employee undertaking regulatory compliance work	Write in	Don't know	Prefer not to say
_2 Existing employee undertaking regulatory compliance training	Write in	Don't know	Prefer not to say
_3 Data Protection Officer (Newly appointed or existing)	Write in	Don't know	Prefer not to say
_4 Software	Write in	Don't know	Prefer not to say

_5 Hardware	Write in	Don't know	Prefer not to say
_6 Privacy Enhancing Technology	Write in	Don't know	Prefer not to say
_7 Consulting	Write in	Don't know	Prefer not to say
_8 ICO data protection registration fees	Write in	Don't know	Prefer not to say
_9 Responding to Subject Access Request (SARs)	Write in	Don't know	Prefer not to say
_ 10 Other DS PIPE IN RESPONSE F7_9 RESPONSE	Write in	Don't know	Prefer not to say

ASK ALL

F8 **Please select the statement about data protection registration with the ICO, that best applies for your business / organisation.**

Please remember your answer to these questions is anonymised and will be used for research purposes only.

SINGLE CODE

I am aware of the ICO registration requirement, and my business / organisation is registered.	1	
I am aware of the ICO registration requirement, but my business / organisation is exempt from registering.	2	
My business / organisation is exempt from registering but my business / organisation has chosen to register.	3	
I am aware of the ICO registration requirement, but my business / organisation is not registered.	4	
I am unaware of the ICO registration requirement.	5	
Don't know	6	
Prefer not to say	7	

ASK ALL

F10 **How many employees, including yourself, have at least some responsibility for managing Data Protection compliance in your organisation over the past 12 months?**

SINGLE CODE PER ROW. READ OUT.

	1 employees	2-9 employees	10-49 employees	50-249 employees	250+ employees	Don't Know
Employees	1	2	3	4	5	6

ASK IF NUMBER OF COMPLIANCE FTES IS GREATER THAN THE NUMBER OF FTES (F101>B7)

F11 **Earlier in the survey you said that your business / organisation had [B7 RESPONSE], however in the most recent question you said that [F11_1 RESPONSE] had at least some responsibility for managing data protection compliance in your organisation over the past 12 months. Can you confirm both these figures are correct?**

MULTI CODE

	F12_1 Yes this figure is correct	F12_2 This figure is incorrect
Number of employees	1	(insert number)
Number of employees responsible for managing data protection compliance	1	(insert number)

ASK ALL

F12 **Are you aware of changes to data protection law that have been introduced as a result of the Data Use and Access (DUA) Act?**

SINGLE CODE. READ OUT.

Yes, I am aware of the changes	1	
No, I am not aware	2	
Don’t know	3	
Prefer not to say	4	

ASK F12=1

F13 **Will your organisation’s activities be affected bychanges to data protection law outlined in the Data Use and Access (DUA) Act?**

SINGLE CODE

Yes, my organisation would be affected	1	
No, it does not affect my organisation	2	
Don’t know	3	
Prefer not to say	4	

ASK F13=1

F14 **Do you foresee any new costs relating to complying with data protection brought about by the implementation of the Data Use and Access (DUA) Act?**

ADD IF NECESSARY: One-off costs are things your organisation has paid for once, such as buying new software, upgrading IT systems, or hiring a consultant to help with data compliance. Ongoing costs are regular or repeated expenses, like software subscriptions, hiring new staff, or running regular training.

SINGLE CODE. READ OUT.

Yes, one-off costs only	1	
Yes, on-going costs only	2	
Yes, both one-off costs and on-going costs	3	
No costs	4	
Don't know	5	
Prefer not to say	6	

G About your organisation

ASK ALL

G2 **Where is your business/organisation's head office located?**

SINGLE CODE. DO NOT READ OUT

East Midlands	1	
East of England	2	
London	3	
North East	4	
North West	5	
South East	6	
South West	7	
West Midlands	8	
Yorkshire and the Humber	9	
Northern Ireland	10	
Scotland	11	
Wales	12	
Outside of UK	13	
Don't know	14	
Refused	15	

ASK ALL

G3 **If you had to estimate the annual turnover of your business for the 12 months to the end of October 2025 into which of the following bands would the business fall?**

SINGLE CODE. READ OUT

Less than £50,000	1	
Over £50,000 up to £100,000	2	
Over £100,000 up to £500,000	3	

Over £500,000 up to £2 million	4	
Over £2 million up to £10 million	5	
Over £10 million	6	
Don’t know	7	
Refused	8	

H Close of survey – Telephone

ASK ALL

H1 **That is the end of the survey, thank you very much for your time.**

We would like to conduct some follow-up research on the topics covered in the survey. Are you happy to be re-contacted by IFF to be invited to take part in future research? It will take place in the next few weeks.

SINGLE CODE. DO NOT READ OUT.

Yes	1	
No	2	

IF YES:

H2 **What is the best way to contact you?**

WRITE IN EMAIL ADDRESS	1	ALLOW REFUSAL
WRITE IN TELEPHONE NUMBER	2	ALLOW REFUSAL

ASK ALL

H3 **On the behalf of the Information Commissioners Office (ICO) and IFF Research, thank you very much for taking the time to complete this important study.**

Just to confirm, we'll be keeping your contact details and answers until December 2026 and the ICO will hold the anonymised data for up to 6 years.

If you'd like a copy of your data, to change your data or for your data to be deleted then please go to http://www.iffresearch.com/gdpr/ for more information.

You also have the right to lodge a complaint with the Information Commissioners Office (ICO) and you can do so by calling their helpline on 0303 123 1113.

I Close of survey - Online

FINAL SCREEN

I1 **That is the end of the survey, thank you very much for your time.**

On the behalf of the Information Commissioners Office (ICO) and IFF Research, thank you very much for taking the time to complete this important study.

Just to confirm, we'll be keeping your answers until December 2026 and the ICO will hold the anonymised data for up to 6 years.

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Annex B – Qualitative interview guide

Data Controllers Survey - Topic Guide J12660.03 Date
22/6/26

Telephone

A Quota targets

From the quantitative survey of 2,000+ data controllers, where organisations have responded 'tend to disagree' or 'disagree' to the question:

'To what extent would you agree with the following statement: Before completing this survey, I was aware of the ICO and its work'.

Total number of interviews	No. of interviews
Total	20
Total number willing to participate	44

Sector	Variable	Current sample size	Interviews target
Private sector	B2 = 1	44	20

Size	Variable	Current sample size	Interviews target
0 – 1 employees	B3 = 1	34	11
2 - 9 employees	B3=2	9	9

B Introduction – 5 minutes

INTERVIEWER TO INTRODUCE THEMSELVES AND THE RESEARCH

Good [*morning/afternoon*]. Thank you very much for your time today.

As you are aware, the Information Commissioner's Office (referred to from here as the ICO) have commissioned IFF Research to carry out research to help them understand what types of activities organisations carry out with personal data and their interaction with regulation. I would like to thank you for taking part in the initial survey and flagging your interest in taking part in this call to go into more detail around some of your answers. Your input is greatly appreciated and will help to provide insight to the ICO.

Just to reassure you, nothing you say will be directly attributed to you or your organisation and the ICO does not know who is participating in this research. The questions in this guide are designed to gain a snapshot of business understanding; they're not designed to be a test. If you don't know the answer to something, please let me know and we can move on.

The interview should take around 60 minutes.

Just to remind you, as a thank you for participating in the research we are offering a £50 incentive, paid through an e-voucher or as a donation to one of our approved charities.

GDPR, Consent and Commercial In Confidence: All information collected in this survey will be treated in the strictest confidence. You have the right to a copy of your data, to change your data or to withdraw from the research. If you'd like to do this or find out more, you can consult our website at http://www.iffresearch.com/gdpr.

Any identifiable information will be kept securely on our servers and deleted within 12 months after the completion of the project, which will be no later than December 2026.

ADD IF NECESSARY: IFF holds ISO/IEC 27001:2013 certification (the international standard for information security) as well as UK Cyber Essentials Plus.

Recording: We would like to record the interview for quality and monitoring purposes, so that we may accurately capture everything that you tell us. The recording will also allow us to create transcriptions that will feed into our analysis. Is that okay?

Thank you. Do you have any questions before we start?

C Background – 5 minutes

INTERVIEWER NOTE: IF TALKING TO A SOLE TRADER OR MICRO BUSINESS USE "YOUR BUSINESS" INSTEAD OF "YOUR ORGANISATION" THROUGHOUT THE GUIDE. TAILOR ANY OTHER LANGUAGE TO FIT.

I'd like to start by getting a bit of background about you, your organisation and the types of activities your business carries out that involve personal data.

C1 **Could you briefly summarise your organisation and its main activities for me?**

INTERVIEWER NOTE: WE ARE NOT ASKING ABOUT THE ORGANISATION IN ITS ROLE AS A DATA CONTROLLER, AND A SHORT ANSWER HERE IS FINE.

C2 **What do you understand personal data to be?**

INTERVIEWER NOTE: BY PERSONAL DATA WE MEAN ANY INFORMATION RELATING TO A CUSTOMER OR MEMBER OF THE PUBLIC SUCH AS A NAME, ADDRESS, TELEPHONE NUMBER, CCTV FOOTAGE OR ANY OTHER PERSONAL INFORMATION RELATING TO SOMEONE.

C3 **Could you briefly summarise what types of personal data your organisation processes and for what purposes?**

INTERVIEWER NOTE: "PROCESSING" COULD INVOLVE USING, COLLECTING, STORING OR ANALYSING THIS DATA.

INTERVIEWER NOTE: WE ARE INTERESTED IN THE PROCESSING OF PERSONAL DATA OTHER THAN FOR PERSONNEL, HR OR RELATED PURPOSES.

C4 **How does your organisation collect or source the personal data that you process?**

D Awareness of regulation (10 minutes)

We'll now move on to the main questions.

D1 **Firstly, what do you think the role of regulators is in the UK? How do they interact with businesses such as yourself?**

- In what situations would regulators get involved?
- Can you give examples of some UK regulators?

D2 **Do any UK regulators have an impact on your day to day business practices?**

- IF YES: In what ways?

D3 **Are you aware of any data protection laws in the UK?**

IF YES, probe:

- Can you tell us briefly what aspects of data protection you know about?
- What obligations do you think organisations have?
- Which organisations do you think these laws apply to?
- Can you tell us briefly what you know about the rights people have over the use of their personal data by businesses?

D4 **As far as you are aware, how is the use of personal data regulated within the UK?**

- Which organisations or authorities are responsible for ensuring data protection?
- How do businesses know what they are expected to do?

D5 **Who do you think has a responsibility for ensuring that people's personal data is handled fairly and securely?**

Probe on:

- Consumers
- Businesses
- Regulators
- Anyone else

D6 **To what extent do you think businesses in your sector are aware of their data protection responsibilities? Why?**

E Interactions with data protection (15 minutes)

Thanks, the next questions will be on data protection legislation. Please be assured that nothing you say today will be reported back to the ICO in a way that would identify you or your organisation.

E1 **Businesses or organisations may have processes or technology in place to help with their personal data requirements. Does your business have any measures in place to meet requirements set out by data protection legislation?**

INTERVIEWER NOTE: WHEN TALKING ABOUT DATA PROTECTION LEGISLATION WE ARE REFERENCING TO 1) THE UK GENERAL DATA PROTECTION REGULATION (UK GDPR) AND 2) THE DATA PROTECTION ACT 2018. TOGETHER, THESE LEGISLATIONS SET OUT HOW ORGANISATIONS MUST COLLECT, USE, STORE, AND PROTECT PERSONAL DATA.

FOR EACH PROCESS OR TECHNOLOGY PROBE FOR DETAIL:

- Privacy notice
- Data retention schedules
- Security controls
- Reviewing processes in line with current regulation requirements
- How much did you spend in the past 12 months?

IF SAY NO MEASURES IN PLACE AT E1:

E2 **Is there a reason for not having any measure in place?**

E3 **Has your business experienced any data protection events, such as complaints, Subject Access Requests or data breaches in the last 12 months?**

INTERVIEWER NOTE: A SUBJECT ACCESS REQUEST IS WHEN AN INDIVIDUAL ASKS AN ORGANISATION FOR ACCESS TO THEIR PERSONAL DATA AND RELATED INFORMATION HELD ABOUT THEM.

Probes:

- What did this involve?
- How much time did you spend on resolving them?
- Which aspects were most difficult?
- What could have helped you resolve them more easily?

E4 **Thinking about data protection compliance more generally, what are the biggest challenges for your organisation?**

Probes:

- Knowing what regulations and information apply to your business
- Understanding current guidance/ guidance aimed at larger organisations
- Cost of safeguards
- Which of these is the biggest challenge? Why?

E5 **How confident are you in the way your business processes and controls personal data?**

E6 **How important do you think it is to stay up to date with data protection requirements?**

- Why?
- IF DOES NOT KEEP UP TO DATE: Why do you not keep up to date? Are there other types of regulations relevant to your business that you stay up to date with?
- PROBE ON: volume of personal data stored / lack of awareness of responsibilities / not enough time

ASK THOSE WHO HAVE AT LEAST PARTIAL DATA PROTECTION RESPONSIBILITIES AND REQUIREMENTS AS DATA CONTROLLERS

E7 **When was the last time your business reviewed the requirements for data protection compliance?**

- What prompted the review? PROBE FOR SPECIFICS
- Could you tell us more about what you did?
- What would typically trigger you to review your data protection practices? E.g.: Specific incident / changing regulation / business growth?
- If haven't reviewed recently: Is there a reason why you have you not reviewed recently?

ASK THOSE WHO HAVE AT LEAST PARTIAL DATA PROTECTION RESPONSIBILITIES AND REQUIREMENTS AS DATA CONTROLLERS

E8 **How do you keep yourself or your organisation up to date with data protection law requirements?**

- What resources do you use?
- Where would you look for information about processing personal data and complying with data protection law? PROBE ON: gov.UK; industry bodies; ICO, ICO's website with advice for small organisations
- How regularly do you review these resources? E.g., Only when prompted / Once during company set up / Annually / More regularly?

F Engagement with the ICO (10 minutes)

READ TO ALL: The ICO is the regulator for data protection legislation in the UK. This includes the UK General Data Protection Regulation and the Data Protection Act. The ICO has a duty to oversee implementation of data protection legislation, this includes ensuring that people's personal data rights are upheld. The ICO also provides material and services to assist organisations with processing personal data in an appropriate and proportionate way that complies with data protection legislation requirements.

This section will focus on engagement with the ICO and what could be done going forward to improve the level of engagement.

F1 **In the survey you said that you [DISAGREED/ STRONGLY DISAGREED] that prior to taking part you were aware of the ICO and its responsibilities. Can you tell me more about that?**

Probe:

- Were you aware of the ICO at all before the survey?
- What did you think their role was?
- IF COMPLETELY UNAWARE: why do you think the ICO had not previously come to your attention?

F2 **To the best of your knowledge, has your business ever engaged directly or indirectly with the ICO?**

Probes:

- If yes: What was the reason for this?
- If yes: How did you find that experience?

F3 **Now that you've heard about the ICO's role as the regulator for personal data protection, when would you expect to engage with the ICO?**

- Probe: Do you plan to visit their website? Do you plan to explore the services they offer?

F4 **Are you aware of the requirement to register with the ICO as a data controller if you are processing personal data?**

Probes:

- If aware: How did you learn about this requirement?
- What do you think registration involves?

- If not aware: What do you think about this requirement, now that you know?

F5 **Are you aware that registration with the ICO involves an annual fee?**

INTERVIEWER NOTE IF ASKED FOR MORE INFORMATION ON THE FEE: THE ANNUAL FEE FOR REGISTERING WITH THE ICO DIFFERS LARGELY DEPENDING ON THE BUSINESS' SIZE AND TURNOVER. THERE ARE THREE TIERS OF FEES RANGING FROM £52 AND £3,763. MOST COMPANIES FALL BETWEEN THE £52-£78 RANGE.

PAYING THE FEE HELPS FUND THE ICO'S WORK AND ALSO HELPS BUSINESSES STRATEGICALLY POSITION THEMSELVES AS TRUSTWORTHY, ACCOUNTABLE, AND PROACTIVE IN THE EYES OF THE PUBLIC AND OTHER COMPANIES. BEING LISTED AS A FEE PAYER ON THE ICO'S WEBSITE SHOWS THAT A BUSINESS VALUES PERSONAL DATA AND ARE AWARE OF THEIR DATA PROTECTION OBLIGATIONS.

- What do you think the fee pays for? What would you expect in return?
- Does paying a fee change how you think about the ICO?
- Do you think a fee is reasonable for a business like yours?

G ICO support (10 minutes)

Finally, we will be asking some questions on the ways the resources that businesses use ensure compliance with data protection law.

G1 **Have you used any resources or services that assist with data protection law compliance? What are these services and how do they assist?**

Probes:

- IF YES: Can you give examples of times you have used these resources or services?
- IF YES: Is there a cost associated with these resources or services?
- IF YES: What sources are most effective? Why do you say that?
- IF YES: Where do you hear or find out about these resources or services?
- IF NO: Have you ever considered looking for resources or services? IF NOT: Why not?

Prior to the interview we sent an email with the several services that the ICO offers to businesses. These include:

INTERVIEWER NOTE: JUST READ OUT THE BOLDED TEXT AND THEN PROVIDE MORE INFORMATION IF ASKED / IF THEY HAVE NOT READ / CANNOT ACCESS THE EMAIL.

- **Online guidance**: The ICO's practical advice, tips and tools show businesses how to use people's information confidently and lawfully.
- **Data protection checklist**: Self-assessment checklist has been created with small business owners and sole traders in mind to improve understanding of data protection and find out what is needed to do to make sure businesses are keeping people's personal data secure.
- **Business Advice Services**: The ICO offer an advice helpline and live chat service for organisations to speak to a team of experts from the ICO who answer questions and provide advice on data protection compliance.
- **Innovation Advice Service**: fast, direct service for organisations doing new or innovative things with personal data. The ICO give advice to help solve the data protection issues holding up the progress of a new product, service, or business model.
- **Privacy notice generator**: The ICO have developed a quick and easy generator tool to help businesses create a bespoke privacy notice in simple steps. Designed for sole traders and start-ups, as well as small and medium-sized businesses and charities, the privacy notice generator can be customised for customers and suppliers or staff and volunteers to help make sure businesses are compliant with the law.
- **E-learning videos**: Short video guides covering a range of key data protection advice and tips for beginners, such as how to recognise a subject access request, how to deal with a data breach, and guidance on cyber security.
- **Self-assessment tool**: designed to help businesses assess the risks follow a data breach, and when to report it to the ICO.

G2 **Which of these services feel most relevant to your organisation?**

- Why?
- Which of these feels least relevant and why?

G3 **Now that you are aware of these services, would you look to access ICO support in the future?**

- Why / Why not?

G4 **Where should ICO information be located so it's easy for businesses like your to access? What type of content or delivery style would make you engage?**

G5 **Is there any additional support that would make managing data protection easier for you?**

- Templates; Helplines; diagnostics; webinars; sector specific guidance?
- What information should it include?
- What format would work best e.g., newsletters, email subscriptions, e-learning videos?
- Where would you expect to find this support?

G6 **Is there anything you think the ICO specifically could do to help sole traders and small sized organisations understand data protection – what it is, what it means for their organisations and their obligations?**

H Final comments and wrap up – 5 minutes

Thank you for your time so far, I just have one final question before we finish.

ASK ALL

H1 **Do you have any final comments or anything on the topics we have discussed today you would like us to pass on to the ICO?**

H2 **As mentioned at the start of the interview, as a thank you for taking part we would like to offer you a £50 payment to say thank you for taking part. Would you prefer in the form of an e-voucher or through a charity donation from a pre-selected list of charities?**

Explain that the processing of incentives is done through the IFF accounts team and it can take a couple of weeks for their payments to arrive.

e-Voucher	
Charity donation	

H3 **[IF SELECTED E-VOUCHER] Please can you confirm your email address for us to send the voucher to?**

WRITE IN RELEVANT DETAILS (RESPONDENT NAME AND EMAIL ADDRESS)

H4 **[IF SELECTED CHARITY DONATION]: Which of the following charities would you like us to donate to?**

Great Ormond Street Hospital	
British Heart Foundation	
Macmillan Cancer Support	
Shelter	
National Literacy Trust	
Mind	
Woodlands Trust	
Single Homeless Project	

IFF Research illuminates the world for organisations businesses and individuals helping them to make better-informed decisions.

Our Values:

1. Being human first:

Whether employer or employee, client or collaborator, we are all humans first and foremost. Recognising this essential humanity is central to how we conduct our business, and how we lead our lives. We respect and accommodate each individual's way of thinking, working and communicating, mindful of the fact that each has their own story and means of telling it.

2. Impartiality and independence:

IFF is a research-led organisation which believes in letting the evidence do the talking. We don't undertake projects with a preconception of what "the answer" is, and we don't hide from the truths that research reveals. We are independent, in the research we conduct, of political flavour or dogma. We are open-minded, imaginative and intellectually rigorous.

3. Making a difference:

At IFF, we want to make a difference to the clients we work with, and we work with clients who share our ambition for positive change. We expect all IFF staff to take personal responsibility for everything they do at work, which should always be the best they can deliver.

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