

Data Controller Study 2026

Qualitative findings report

Economic analysis

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ico.

Information Commissioner's Office



Contents

1. Background	3
2. General interactions with regulators	5
3. Awareness of data protection law	6
4. Application of data protection	8
5. Views about the ICO	10
6. Engaging small businesses	12

1. Background

In February and March 2026, IFF Research conducted 20 qualitative follow-up interviews with organisations that participated in Year 3 of the Data Controller Study survey.

The interviews were focused on sole traders and micro organisations (organisations with less than 9 employees) that reported being unaware of the Information Commissioner's Office (ICO) prior to taking part in the survey.

This area of focus was determined by reviewing the quantitative survey findings of the Data Controller Study. The Data Controller Study shows that 21% of data controllers were not aware of the ICO. This is driven primarily by sole traders and micro organisations (78% and 17% respectively), as comparably, less than 1% of medium (50-249 employees) and large organisations (250+ employees) reported they were unaware of the ICO.

As a result of the quantitative survey findings, the qualitative research aimed to delve into identifying awareness and communication barriers between the ICO and data controllers, what their views and expectations are after having been made aware of the ICO and insights about improving engagement.

This document summarises the key findings from the qualitative interviews with unengaged data controllers. Although the small sample size means that we should be careful when generalising the findings to the wider population, the summary of the main themes of the responses provides valuable additional insight to the quantitative findings of the Data Controller Study.

The key themes are summarised below:

- **Organisations reported limited engagement with regulators:** The majority of organisations believed they were not impacted by regulators day to day and expected regulators would only get involved when compliance issues arose.
- **Awareness of data protection legislation was low:** Organisations reported understanding the concept of data protection through a 'common sense' approach rather than having heard of or learnt about it in a formal context. There was an

expectation that regulators should make them aware of data protection laws when compliance is mandatory.

- **Data protection was seen to be of limited relevance:** As a result of the data processing that organisations were undertaking, small data controllers often believed that data protection had limited relevance to their business. Despite little to no measures being in place to ensure data protection practices, many businesses felt confident in the way their business handled personal data.
- **Engagement with the ICO had often not been considered:** Organisations were unaware of the resources provided by the ICO and were unaware of the ICO's registration requirements. Whilst some participants expressed interest, several participants failed to see the resources' relevance to their activities or did not view their use as a priority during the interview.
- **Proactive engagement would help small businesses become more aware and educated about their data protection obligations:** The findings indicated that businesses favour communication approaches that are direct, accessible, and require minimal time investment. Addressing views that data protection had limited relevance to their businesses will be key to future engagement.

The Technical Report published alongside the Data Controller Study details the methodology underpinning the Study and provides supplementary information about the methodology followed for the qualitative interviews.

2. General interactions with regulators

Organisations reported a vague understanding of UK regulators. Many highlighted the role that regulators have in keeping people safe and upholding laws, ensuring appropriate standards are followed and intervening when businesses fail to comply.

Most businesses believed they were not impacted by regulators day to day. Engagement with regulators was generally viewed as reactive, occurring primarily in response to complaints or compliance failures, rather than as part of ongoing business activity.

“I guess the role of regulators is to keep people safe”

- Sole trader, Psychotherapist

Their experience with regulators was heavily shaped by the existence of sector specific regulators. For example, health and safety associations in the cleaning industry, professional bodies for psychotherapy, industry standard inspections for electricians and professional registration boards for architects were mentioned as regulators they were aware of.

Some organisations were also broadly aware of the existence of regulators like Ofwat or Ofsted, but few understood their role across the UK economy. The majority of organisations could not name a cross sector regulator, providing context for the lack of awareness of the ICO among respondents.

“Can’t name any [regulators] as far as my business is concerned, but you’ve got the Ofwats and all those sort of people...”

- Sole trader, Home Brewing Supply Retailer

3. Awareness of data protection law

Businesses demonstrated a basic understanding of data protection laws, often framed as a 'common sense' approach. Learning about data protection was typically described as informal and self-directed.

"As a sole trader [who is] self-employed, a lot of this you have to learn and pick up yourself – some of it is common sense"

- Sole trader, Martial arts instructor

Some respondents referenced specific legislation such as the UK General Data Protection Regulation (UK GDPR), others cited outdated legislation (Data Protection Act 1988 which has since been replaced with the Data Protection Act 2018). Whilst most businesses were unable to name specific laws or regulatory bodies, many were able to reference several key principles such as:

- not retaining data longer than necessary;
- not sharing data with unauthorised individuals; and
- using data only for legitimate business purposes.

Despite the low awareness amongst the sample, the majority of businesses reported that the responsibility of ensuring people's personal data is handled fairly and securely should lie primarily with the organisations that collect and process the personal data.

Regulators and government bodies were seen as having a supporting or oversight role, providing guidance on requirements and intervening in the event of complaints and non-compliance.

Some participants also identified a degree of responsibility for consumers to be aware of how and with whom they share their data. Others suggested that consumers have limited control once data has been shared with an organisation, thereby moving the burden towards organisations.

Whilst businesses did identify their own role in ensure people's data is handled responsibly, there was a general expectation that other businesses in their sector, particularly sole traders, would face similar challenges of being unaware of their data protection obligations.

There was an expectation that if compliance is mandatory, regulators should make affected businesses aware of data protection laws. After

being made aware of the ICO, there was an expectation that this responsibility lay with the ICO.

"If this was a requirement... I would expect that the ICO would contact every business..."

- Sole trader, Domestic cleaning

Case study: Sole trader, Pest control

This sole trader collects names, phone numbers and physical addresses directly from clients when they book their services over the phone. The data is stored to remember previous services provided to customers and establish if there are long term pest control problems from repeat customers.

The sole trader reported having some awareness of data protection laws, spotlighting the obligation to keep information they hold confidential. They explained that they do not regularly keep up to date with data protection requirements. The last time they recalled reviewing their requirements for data protection compliance was 2 or 3 years ago, which the respondent "basically left it to [their] wife to sort out".

"As far as I know, I'm above all that. My wife, she's pretty tuned in to that sort of thing [and] I basically know [data protection laws] through her".

They reported lack of awareness as the biggest challenge the business faces considering data protection. They felt they have not received any guidance or advice informing them that this was a business requirement.

"Like everything, [data protection] is important but I don't know what is expected of me, so I do what I can to treat people's information securely".

Their partner handles storing of personal data from their business on their computer, which they consider to have a "pretty robust system" so the risk of being hacked was "pretty unlikely".

When asked whether other businesses in the same sector were aware of data protection responsibilities, the respondent reported "I suspect very, very unaware because it's a pretty unregulated industry".

4. Application of data protection

Across the sample, formal data protection measures were often limited or absent. Most of the businesses interviewed did not actively monitor or review data protection compliance and few had ever completed a formal review of their processes.

“[I] wouldn’t know if [I] was violating some rule or not.”

- Micro business, Music publisher

Data protection was often viewed as having limited relevance to business operations. Reasons included:

- collection of low volumes of personal data;
- collection of “basic” personal data (e.g. names, contact details) and data required to provide their products or services;
- storage of data on password-protected devices or in physical formats; and
- reliance on third-party service providers (e.g. payment platforms, email systems).

“I don’t think that my business is involved in anything which would come under any data protection law... apart from very, very basic data...”

- Sole trader, Pest control

As a result, data protection was generally not seen as a priority area for businesses. Many participants reported that limited time and resources constrained their engagement with data protection compliance. Businesses felt that core business activities and customer relationships took precedence. Many businesses mentioned that other regulatory areas (e.g. health and safety, tax, financial compliance) were of a higher priority, which left little time for keeping up to date with data protection.

“Everyone’s probably aware [of data protection], but I can imagine as a small business or sole trader it is nowhere near the top of their priority list.”

- Micro business, Manufacturer of vehicle security products

Despite little to no measures being in place to ensure data protection, many organisations expressed confidence in the way they handled personal data. This confidence was linked to the perceived simplicity and low volume of the data they processed, as well as the absence of complaints or known breaches. In addition, participants frequently described their activities as low-risk. Some businesses reported confidence, even while acknowledging that they did not fully understand compliance requirements.

“I'm not saying the law doesn't apply to me, but I don't think what I'm doing, is of any interest to the law”.

- Sole trader, Pest control

Case study: Sole trader, Psychotherapist

Our participant is a sole-trader psychotherapist and trainer, providing workshops, services, and professional supervision. They collect contact details, such as names, phone numbers and addresses from clients and also collect sensitive therapy notes during sessions.

Contact information is stored electronically on a password-protected computer, which is kept updated. Sensitive therapy notes are recorded by hand and stored in a physical safe, with identifying information kept separately using a coding system.

They understand the broad principles of UK GDPR and know they are responsible for keeping client data safe, but they haven't reviewed the rules in over a decade. They prioritise their responsibility to clients over formal compliance.

After learning more about the ICO, they feel its tools may be more useful than expected, especially the Data Protection checklist and self-assessment tool. They highlight that clearer, more supportive messaging, tailored towards sole traders and small organisations, would make compliance feel more approachable.

5. Views about the ICO

Across the sample, awareness of the ICO prior to the survey was low. After being introduced to the ICO during the research process, responses varied about prospective engagement with the ICO. Some participants indicated that they would explore ICO resources, while others continued to view them as irrelevant or not a priority. This was driven by the views that data protection had limited relevance to their business.

When informed of the registration requirement, businesses were not aware of the requirement to register with the ICO as a data controller. Generally speaking, all organisations that collect, process and store personal data have to register and pay a fee to the ICO as a data controller, or inform the ICO that they are exempt.

Exemptions could, in part, drive these low rates of awareness amongst sole traders. For example, organisations processing personal data only for the purposes of staff administration, accounts and records or processing personal information without an automated system such as a computer are exempt from paying a fee.

Given the nature of processing that some organisations reported, it may be that they are exempt from registering, however, we would still expect these organisations to be aware of the ICO in order to know of such exemptions.

When informed of the registration requirement, participants expressed a range of views. Some indicated willingness to register if the process was straightforward, noting that this process is consistent with fees associated with other professional obligations.

Some described it as a deterrent or questioned its value given the scale of their data processing and limited perceived relevance of data protection to their businesses.

“I’d be reluctant to pay that fee seeing as I’ve had zero help and interaction from them.”

- Sole trader, Martial arts instructor

Others raised concerns about the additional regulatory burden, highlighting that they already face mandatory registrations from their own industry bodies. Suggestions included removing the fee for small

businesses or redistributing the cost through general taxation to reduce resistance.

"It's just another thing that small businesses need to do, and in this world, small businesses struggle, and it's just something else that I'm not a huge fan of."

- Micro business, Art gallerist

Participants often expected that the fee would support the ICO's operational activities, as well as provide access to compliance support and updates on legislative changes.

"I would want to be made aware of any new regulations that I need to adhere to."

- Sole trader, Door importer

There was also an expectation that the fee would provide tangible benefits, such as certification, accreditation, or mentions on the ICO website that could be shared with clients to show compliance with data protection law.

"I would hope it pays for... some kind of registration to say that you are registered... something competitive."

- Micro business, Acting Talent Agency

6. Engaging small businesses

Many businesses attributed their limited awareness of the ICO to a perceived low public profile of the organisation. To address this, the majority of businesses requested proactive engagement directly from the ICO where compliance obligations are mandatory. Businesses requested direct communication such as:

- leaflets or letters through the post;
- emails and newsletters; and
- workshops or networking meetings in industry contexts.

Increased visibility through media or advertising was also described as a useful way to raise baseline awareness of the ICO and its role.

“They’ve never sent me a leaflet, email, or text. And I’ve never seen any adverts on the TV [about them]”

- Sole trader, Driving instructor

Businesses highlighted that such outreach should include clear communication about the relevance of data protection law to their business or highlight changes in legislation that would affect their business in a timely manner. They highlighted that this would assist sole traders and micro businesses in becoming more educated about their data protection obligations. For some businesses, communication from the ICO would resonate more if they frame their role as supportive and focused on client protection, rather than enforcement against non-compliance.

Several businesses reported not knowing where to go for clear or reliable information about data protection. Many reported they would rely on search engines, AI tools, and GOV.UK to find relevant information. Businesses also expressed concerns that the ICO resources would not be tailored to small businesses like their own, thereby wondering whether ICO guidance would be relevant to them.

Many suggested that greater signposting from the GOV.UK website or webpages targeted towards small businesses (such as tax self-assessment or industry body communication) could improve awareness of data protection.

In terms of services provided by the ICO, businesses favoured services that are direct, accessible, and require minimal time investment. Short,

practical resources such as the self-assessment checklists were described as appealing. Guidance and advice should be easy to find, clearly worded, and presented in a range of formats including e-learning and written guidance, to suit different preferences.

Participants expressed interest in having access to human or personalised support, with less enthusiasm for automated tools such as chatbots. After hearing of the services that the ICO provides, several businesses highlighted that the one-to-one ICO helplines or Business Advice Services could be helpful resources for future questions around data protection.

However, several organisations reiterated that they would be unlikely to engage with the ICO resources, without prior engagement from the ICO. This reflected their broader perception that data protection obligations do not significantly apply to their business, the personal data they hold is minimal and they see little need for external guidance or support in the way they process personal data. Others highlighted challenges around capacity and other business activities taking priority.

“I probably wouldn't [use ICO resources], unless somebody got in touch [...] and said [...] you need to check out whether you're doing the right thing.”

- Sole trader, Music publisher

Case study: Sole trader, Martial arts instructor

Our participant is a sole-trader martial arts instructor managing around 100 customers. They collect customer information such as names, addresses and telephone numbers through a membership form during a trial session. They sometimes also collect relevant medical information to safely carry out the kickboxing sessions and they hold medical data for underage customers, where parents will advise them of conditions verbally or via the membership form.

Membership forms are kept in a box under their desk. Information is never stored on a computer and rarely on other digital devices, except for names and phone numbers on their personal mobile which is password protected.

If a customer decides not to join after the trial session, their forms are shredded. Old forms are also reviewed at random intervals, and any older member forms are shredded.

They believe most data protection laws do not apply to their small, low-tech business and they feel confident in how they handle personal data to ensure information is kept confidential.

They recognise that their biggest challenge is knowing where to find clear guidance. They believe the ICO could help small businesses by increasing visibility and offering straightforward, practical resources, including e-learning videos and checklists.