IFF Research

ICO Data Controller Study: Technical Report

The Information Commissioner's Office

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Contents

IFF Research

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 2,320 quantitative questionnaires completed followed by 20 qualitative interviews.

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[1] ICO25 strategic plan | ICO

Methodological Approach

Outline of methodological approach

The Data Controller Study (the Study) comprises a quantitative survey and qualitative interviews. This is the second wave of data collection for the Data Controller Study. It is intended that there will be a minimum of one further wave of the Study.

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

In order to inform the sampling and weighting approach and to ensure fair 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[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 2, we have replicated this approach utilising the most up-to-date data from both of these surveys, which in this case were 2024 surveys.

Table 2.1 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

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

[5] Business population estimates 2024 - GOV.UK (www.gov.uk)

We estimated the 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 BEIS 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 a source 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 2024 Business Population Estimates and 2024 DCMS Business Data Survey data (for private sector) are shown in Table 2.1.

Table 1.1 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	100.00%	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%

These are broadly consistent with the Year 1 population grid, which is reproduced in Table 2.2 for reference. The main difference is a slight decrease in the proportion of organisations with 0-1 employees and slight increase in micro and small organisations in Year 2 population figures, driven by private sector businesses.

Table 1.2 ICO Population Estimates: Overall population of data controllers by type and size used in year 1 of the study based on the 2023 DCMS Business Data Survey

	All	**Private Sector Business**	**Public sector organisation**	**Non-profit organisation**
All	100.00%	97.16%	0.36%	2.48%
0-1 employees	74.44%	73.37%	0.14%	0.93%
Micro (2-9 employees)	19.48%	18.38%	0.07%	1.03%
Small (10-49 employees)	4.84%	4.41%	0.04%	0.39%
Medium (50-249 employees)	0.96%	0.80%	0.06%	0.10%
Large (250+ employees)	0.28%	0.20%	0.05%	0.03%

Sample Design

As in Year 1 of the Data Controllers Study, in Year 2, the sample design was intended to achieve a broadly representative sample by organisation type and size. However, it was also imperative that sufficient sample sizes were achieved within the key subgroups to facilitate meaningful analysis. Table 2.3 shows what the sample would look like with no adjustments for increased sample sizes to allow for meaningful subsequent analysis.

Table 2.3 Fully representative sample based on ICO population estimates[6]

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
All	2250	2181	9	60
0-1 employees	1629	1603	3	22
Micro (2-9 employees)	460	433	2	25
Small (10-49 employees)	128	118	1	10
Medium (50-249 employees)	26	22	1	2
Large (250+ employees)	7	5	1	1

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 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 2.4 sets out the resulting sample targets after this rebalancing has been applied.

Table 2.4 Target sample of data controllers for year 2 of the study

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
	2250	1750	250	250
0-1 employees	1199	1099	50	50
Micro (2-9 employees)	533	433	50	50
Small (10-49 employees)	218	118	50	50

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

Medium (50-249 employees)	150	50	50	50
Large (250+ employees)	150	50	50	50

Table 2.4 outlines the target number of survey responses IFF aimed to achieve in each population subgroup. Throughout the fieldwork, these targets were closely monitored and adjusted due to difficulties reaching the required number of organisations for some of the population subgroups. More detail on this process can be found in Chapter 3.

Private sector targets

In line with the approach in Year 1, 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 2024 and applying the proportion of businesses that share personal data (other than employee data) from the 2024 DCMS Business Data Survey data.

Table 2.5 Proposed representative proportions of private business sectors in year 2 of the study[7]

Private business sector	%	(n)
	100%	1,750
A Agriculture, Forestry and Fishing	1.51%	26
B,D,E Mining and Quarrying; Electricity, Gas and Air Conditioning Supply; Water Supply; Sewerage, Waste Management and Remediation Activities[8]	0.52%	10
C Manufacturing	4.44%	78
F Construction	14.58%	255
G Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	7.16%	125
H Transportation and Storage	4.83%	85
I Accommodation and Food Service Activities	3.77%	66
J Information and Communication	5.40%	94
K Financial and Insurance Activities	2.42%	42
L Real Estate Activities	3.35%	59
M Professional, Scientific and Technical Activities	16.14%	282
N Administrative and Support Service Activities	8.43%	148
P Education	6.58%	115
Q Human Health and Social Work Activities	7.67%	134
R Arts, Entertainment and Recreation	6.40%	112

[7] When the number of interviews is calculated exactly as a percentage of the 1,750 interviews in each sector, rounding for each sector means that the raw total of interviews falls to 1,748. In order to ensure the interviews sum up to 1,750, we increased the target by one interview for sectors M and N, as these were closest to 0.5 to be rounded upwards instead of down.

[8] As an exact representation of the population, this would mean achieving 9 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, to ensure base sizes of at least 10 in each sector, we have increased this by one interview and reduced the largest sector (M Professional, Scientific and Technical Activities) by one interview.

S Other Service Activities	6.81%	119

Questionnaire Development

The ICO and IFF Research worked collaboratively in developing the questionnaire. The wave 1 questionnaire[9] was used as the base for wave 2. The ICO suggested some additions and removals for wave 2 and worked closely with IFF to refine the proposed changes. The questions that have been added and updated are discussed below. Survey design principles, including using simple and concise language, a logical question order and ensuring clarity and neutrality were followed 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 on the 6th and 7th of November 2024. The soft launch was conducted using panel providers and 58 surveys were completed in this stage. As part of the soft launch and questionnaire review, a number of questions were modified to streamline the survey or added in line with new areas of interest. These have been set out below:

Question D6a and D6b: Purposes of processing data and whether the purpose is innovative to the business/organisation

In Year 1, we asked Data Controllers if they collected personal data for purposes such as web analytics, supply chain efficiency and customer research, amongst others. In Year 2, we added an additional element to this question to help understand whether using these was innovative for the business/organisation. No changes were required for this question following the soft launch, both statements were asked of all Data Controllers and there was good comprehension of the question with low numbers of 'don't know' responses.

Question F8: Please select the statement about data protection registration with the ICO that best applies for your business / organisation

Question F8 was introduced as a new question which aimed to understand the extent to which organisations were aware of their obligations under UK GDPR to register and pay fees to the ICO. The risk before the launch of fieldwork was that organisations may interpret this question as a compliance check. Throughout

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[9] data-controller-study_technical-report.pdf

the soft launch, no organisations selected the 'prefer not to say' option. This demonstrated that the tone of the question was clear and was not a cause for concern regarding being checked for compliance. Therefore, this question did not require any changes following the soft launch.

Question F11: Check question relating to the number of employees responsible for managing data protection compliance

A check was introduced at question F11 to verify whether responses in questions B3 (size of organisation) and F8 (how many employees are responsible for data compliance) contradicted each other. This question was not required for any of the soft launch responses, with all giving consistent responses. Further information on this question can be found in Chapter 3.

Additional changes to the questionnaire

A handful of minor changes were made elsewhere in the questionnaire ahead of Year 2 and were therefore 'tested' in the soft launch. These included streamlining the routing at question C3 when asking about the types of activities that generate revenue and simplifying the types of costs faced because of complying with data protection from one off direct, one off indirect, ongoing direct and ongoing indirect, to one off and ongoing costs. This did not pose any issues during the soft launch, so did not require changes or reverting to Year 1 wording. The aim of these changes was to streamline the survey experience for respondents and analysis.

As no changes were made following the soft launch, all data collected as part of the soft launch study were included in the final data collected for the main quantitative survey and the 58 responses were included in the final sample of results for 2,320 organisations.

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

Table 2.6 Profile of soft launch

	All	Private Sector Business	Public sector organisation	Non-profit organisation
All	58	58	0	0
0-1 employees	5	5	0	0
Micro (2-9 employees)	5	5	0	0
Small (10-49 employees)	7	7	0	0
Medium (50-249 employees)	10	10	0	0
Large (250+ employees)	31	31	0	0

Overall, the soft launch was successful and no issues with the survey were found.

Data Collection / Fieldwork

Data Collection

For the quantitative survey, a total of 2,320 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 8th November 2024 and 28th January 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 11th November 2024 and 28th January 2024 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 8th November and 25th November 2024 with the aim of achieving 1,000 interviews.

On average the quantitative questionnaire took 29 minutes to complete by phone and 15 minutes to complete online. In year 1 this was 25 minutes to complete by phone and 15 minutes to complete online. 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 scheduling. In contrast, the panel surveys could reach many respondents at once, making data collection much faster overall. Additionally, the CATI approach was designed to target the remaining quotas following the completion of the panel surveys which led to an increased number of businesses screening out due to their quotas being maxed out.

Risks to the approach in advance of fieldwork

In advance of fieldwork IFF set out the risks to achieving the desired targets. Due to the mixed method approach, fieldwork was conducted using a blend of telephone (CATI) interviews and online panels. The reach of panels is limited in the smaller size bands of organisations meaning the CATI targets are partially restricted.

Whilst IFF aimed to achieve the targets outlined in Table 2.4, it was likely some flexibility would be needed during fieldwork, specifically in relation to:

- The accuracy of employee size band in the CATI sample for those with 0-1 employees. In Year 1, of 860 records that were recorded as 0-1 employees on sample, 330 'slipped' into larger size bands once asked over the phone about the number of employees in their organisation. It was anticipated that this could happen, thus reducing the number of responses achieved in the 0-1 employees category. We mitigated the effects of this as best as possible by significantly increasing the number of records ordered in the 0-1 employee category and prioritising this sample initially to allow for slippage into the 2-9 employee category.

- Achieving 50 interviews in some of the organisation types from smaller categories of the size-type combinations (public and non-profit organisations) in the population. The aim was to achieve 50 interviews with public and non-profit organisations in each size band. However, in total, they represent a very small proportion of the population so require a much higher level of engagement for IFF to identify them, more than would usually be assumed for this type of survey.

Fieldwork monitoring and changes

In order to ensure accuracy in 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 quotas, 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 on sample.

Responses were closely monitored throughout fieldwork and IFF introduced a Red, Amber Green (RAG) rating[10] for each quota based on how difficult it was going to be to reach each target based on progress and remaining sample. Feedback provided by the fieldwork monitoring indicated that some of the targets of 50 respondents in the subgroups relating to public and non-profit sectors were not going to be reached. These subgroups were:

- Medium sized (50-249 employees) public sector organisations;

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[10] 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.

- Small (10-49 employees) non-profit organisations;

- Medium (50-249 employees) non-profit organisations;

- Large (250+ employees) non-profit organisations.

It was decided that IFF would allow completed interviews in the remaining subgroups, where there were contacts available to make up any potential shortfall in the total sample size. This was done by retaining the overall public sector and non-profit targets of 250 but relaxing size band targets. Despite best efforts, we reached a total of 247 surveys before removals were made within the non-profit organisation type which fell to 244 surveys following removals.

Achieved sample

The final sample achieved, prior to removals, categorised by organisation size and type is outlined in Table 3.1.

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

	ALL	Private Sector business	Public sector organisation	Non-profit organisation	Don't know
	2,427	1,905	267	247	8
0 -1 employees	1,112	981	54	70	7
Micro (2-9 employees)	614	486	70	58	0
Small (10-49 employees)	318	201	69	47	1
Medium (50-249 employees)	189	121	21	47	0
Large (250+ employees)	188	114	52	22	0
Don't know / prefer not to say	6	2	1	3	0

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.

A total of 14 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, 93 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.[11]

Prior to removal of 107 responses from CATI and online combined, 2,427 interviews were completed. This included 1,250 interviews completed through the CATI route and 1,177 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	1177	1250	2427
Removal - panel (due to failing the quality checks including "speeders", outliers and non-sensical answers)	93	0	93
Removal - Sector unknown	0	8	8
Removal - Size unknown	0	6	6
Total sample - after exclusions	1084	1236	2320

After removals a final sample of 2,320 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.

- 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.

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

Table 3.3 Final sample of data controllers after removals (size x organisation type)

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
All	2320	1810	266	244
0 -1 employees	1071	952	51	68
Micro (2-9 employees)	593	461	73	59
Small (10-49 employees)	303	186	69	48
Medium (50-249 employees)	175	107	21	47
Large (250+ employees)	178	104	52	22

Table 3.4 outlines the breakdown by specific type of private sector organisation. The targets were monitored but not enforced during fieldwork.

Table 3.4 Achieved sample of data controllers – private business sector split

Private business sector	n	Target
	1,810	1,750
A Agriculture, Forestry and Fishing	24	26
B,D,E Mining and Quarrying; Electricity, Gas and Air Conditioning Supply; Water Supply; Sewerage, Waste Management and Remediation Activities	12	10
C Manufacturing	96	78
F Construction	135	255
G Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	166	125
H Transportation and Storage	63	85
I Accommodation and Food Service Activities	56	66
J Information and Communication	173	94
K Financial and Insurance Activities	103	42
L Real Estate Activities	73	59
M Professional, Scientific and Technical Activities	348	282
N Administrative and Support Service Activities	86	148
P Education	93	115
Q Human Health and Social Work Activities	80	134
R Arts, Entertainment and Recreation	136	112
S Other Service Activities	165	119
Not classified	1	

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, 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 3.5 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
'Audio podcasts'	Back-coded into existing answer code	Music and video streaming
'Religious education, home economics'	Back-coded into existing answer code	News / education websites / subscription services

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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 3.6 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 back coded to the technology (not routed to E3 but added to E2 base)	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)	2064	0	2064	2064	No
2_Anonymisation technology / processes	2059	0	2059	2059	No
3_Pseudonymisation technology / processes	2190	0	2190	2190	No

4_Facial or biometric recognition technology	2117	1	2116	2117	Yes
5_Cloud storage	1194	0	1194	1194	No
6_Physical data server	1732	40	1692	1732	Yes
7_Encryption	1650	2	1648	1650	Yes
8_Software/hardware for managing Data Protection compliance	1714	50	1664	1714	Yes
9_Statistical Analysis Tools	2038	0	2038	2038	No
10_Cloud Processing Facilities	1958	1	1957	1958	Yes

- 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_1 'Other privacy enhancing technology' is 2121 compared with 2300 that did not select other (following back coding). A consistent approach was taken to data production here as in Year 1.

- 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
Number of employees	11	2
Number of employees responsible for managing data protection compliance	31	4

In total 81 organisations were referred to question F11 and the majority maintained that their original response was correct. 15 corrected their number of employees and 9 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 3.5. The total number of organisations with 0-1 employees decreased slightly with most moving up to 2-9 employees. This is all incorporated into the final numbers outlined earlier in this chapter.

Table 3.7 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	-	11	2	1		14
	2-9 employees		-				0
	10-49 employees			-			0
	50-249 employees				-	1	1
	250+					-	0

	Total	0	11	2	1	1	-

Where organisations corrected the number of employees responsible for data protection compliance, a total of 9 organisations initially stated that the number they had previously given needed updating. The data was edited as below:

- 5 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.

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

Qualitative Interviews

A qualitative fieldwork stage was included subsequent to the completion of the quantitative survey, with a target of speaking with 20 organisations. The qualitative interviews aimed to engage with a range of organisation types, in order to complement findings from the quantitative survey. The interviews were conducted to further explore how organisations use different technologies to process personal data. The technologies of interest were Artificial Intelligence, Automated Decision Making, anonymisation, pseudonymisation, and facial/biometric recognition technology. The interviews covered the following:

- What organisations collect personal data for and how this is sourced;

- Understanding of different technologies;

- How organisations have adopted certain technologies to process personal data;

- Rationale, impact and challenges in implementing these technologies;

- Consideration and likelihood to adopt different technologies.

The qualitative survey participants were recruited from those agreeing to participate after having completed the quantitative survey.

The qualitative interview guide used is included in Annex B.

Qualitative Interviews Fieldwork

As part of the research in order to gather further insight, 20 qualitative interviews were carried out between 3rd February 2025 and 18th March 2025. Each interview fed into individual case studies, to provide further details on data controllers' processing activities, their understanding of different technologies, how they adopt these technologies and their considerations of adopting technologies they don't currently use.

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 3.7 shows the technologies used by respondents to the qualitative interviews as per their quantitative responses. During the qualitative follow ups it became apparent that a small number of organisations had misinterpreted their quantitative responses and did not use these technologies in a data processing capacity.

Table 0.8 Qualitative sample structure by size and type

	ALL	Private Sector business	Public sector organisation	Non-profit organisation
All	20	6	12	2
0 -1 employees	5	5	0	0
Micro (2-9 employees)	3	0	2	1
Small (10-49 employees)	2	0	2	0
Medium (50-249 employees)	3	1	2	0
Large (250+ employees)	7	0	6	1

Table 0.9 Qualitative sample structure by technology used

Technologies	Completed interviews based on quant response
TOTAL	20
AI decision making systems / Artificial intelligence as a service	7
Anonymisation	15
Pseudonymisation	12
Facial or biometric recognition technology	10

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	100.00%	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%

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	1.736096885	0.067858143	0.340267401
Micro (2-9 employees)	0.968594761	0.023033462	0.438624212
Small (10-49 employees)	0.653165991	0.013374941	0.206466086
Medium (50-249 employees)	0.216581082	0.066585191	0.050725167
Large (250+ employees)	0.049690084	0.025814569	0.034798332

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[12]:

$$\frac{71.24}{41.03} = 1.74$$

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.

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

Limitations

Outline of caveats and limitations to the method

There are a handful of limitations to the method used in this study due to logistical factors. 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 1,579 (compared with 2,320 achieved interviews), with a design effect of 1.47. 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	5	CONTINUE
Transferred to respondent	6	
Hard appointment	7	MAKE APPOINTMENT
Soft Appointment	8	
Engaged	9	CALL BACK
No reply / Answer phone	10	
Refusal	11	THANK AND CLOSE
Not available in deadline	12	
No reply / Answerphone	13	
Dead line	14	
Company closed	15	
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. IFF holds ISO/IEC 27001:2013 certification (the international standard for information security) as well as UK Cyber Essentials Plus. 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 2025. As part of our quality control procedures, all interviews are recorded. Is that OK?

SINGLE CODE

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

<div style="background-color:#e3efd3; padding:1em;">

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: Annie Avis at IFFdatacontrollerssurvey@IFFresearch.com or on 0800 804 8039**
- **I**

</div>

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 15 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.

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?

IFF Research operates under the strict guidelines of the Market Research Society's Code of Conduct and our research adheres to General Data Protection Regulation (GDPR). IFF holds ISO/IEC 27001:2013 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:** Annie Avis 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 (B4=2/3) AND ROUTE = CATI

B6 What is the main business activity of your business?

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?**

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 **And 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/partners etc) 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, ALSO KNOWN AS 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?**

D6b And has your business/organisation used personal data to try to innovate any of the following areas in the past 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

MULTICODE. READ OUT. RANDOMISE.

	D6a Our organisation processes personal data for this purpose	D6b This was innovative for our business/ organisation	
Web analytics	1	1	
D6a show: Product/service analytics necessary to deliver your core	2	2	

product / service offer ('service' also applies to public organisations, charities, etc.) [D6b SHOW product / service analytics]			
Insights for online and offline advertising	3	3	
Supply chain efficiency	4	4	
Direct Marketing	5	5	
Customer research	6	6	
Product development/innovation	7	7	
Internal research	8	8	
Regulatory and/or statutory requirements	9	9	
[IF D6A SHOW: Responding to requests from government authorities such as law enforcement] [IF D6B SHOW: Responding to requests from authorities]	10	10	
Sell/ trade data to other businesses or organisations	11	11	
Other (please specify)	12	12	
Don't know	13	13	
DNRO: Not applicable	14	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, ALSO KNOWN AS 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?**

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	

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 <u>NOT</u> 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

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

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

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?**

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	
Other (please specify)	9	
Don't know	10	EXCLUSIVE

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 IF F5=1

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

SINGLE CODE. READ OUT.

£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	
£50,000-£59,999	8	
£60,000-£69,999	9	
£70,000-£79,999	10	
£80,000-£89,999	11	
£90,000-£99,999	12	
Over £100,000	13	
Don't know	14	
Refused	15	

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.

	0-1 employees	2-9 employees	10-49 employees	50-249 employees	250+ employees	Don't Know
_1 Full time employees (FTE)	1	2	3	4	5	6
_2 Part-time employees	1	2	3	4	5	6

ASK IF NUMBER OF COMPLIANCE FTES IS GREATER THAN THE NUMBER OF FTES (F8_1>B3)

F11 **Earlier in the survey you said that your business / organisation had [B3 RESPONSE], however in the most recent question you said that [F8_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

	F9_1 Yes this figure is correct	F9_2 This figure is incorrect
Number of employees	1	(insert number)
Number of employees responsible for managing data protection compliance	1	(insert number)

G   About your organisation

ASK ALL

G1   **How does your business/organisation engage with its customers?**

SINGLE CODE. READ OUT

Online only business – no bricks and mortar premises for customers to access	1	
Bricks and mortar only, no engagement with digital economy, for example, no use of email or card payments	2	
In both ways - Bricks and mortar and online customer presence (potential sub-categories: website, social media, advertise online, using email, accepting card payments)	3	
Don't know	4	

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	
Don't know	13	

Refused	14	

ASK ALL

G3 **If you had to estimate the annual turnover of your business for the 12 months to the end of October 2024 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 NAME	1	ALLOW REFUSAL
WRITE IN EMAIL ADDRESS	2	ALLOW REFUSAL
WRITE IN TELEPHONE NUMBER	3	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 2025 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 2025 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.

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Annex B – Qualitative interview guide

A   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 data processing activities and interaction with the Data Protection compliance 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 interview should take around 60 minutes.

IF PRIVATE OR CHARITY

Just to remind you, as a thank you for participating in the research we are offering a £50 incentive paid directly to yourself through Wise or PayPal, or as a donation to one of our approved charities.

IF PUBLIC SECTOR

Just to remind you, as a thank you for participating in the research we are offering a £50 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. IFF holds ISO/IEC 27001:2013 certification (the international standard for information security) as well as UK Cyber Essentials Plus.

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 2025.

Recording
We would like to record the interview so that we can accurately capture everything that you tell us. Is that okay?
Thank you. Do you have any questions before we start?

B   Background – 5 minutes

I'd like to start by getting a bit of background about you, your organisation and your organisation's data processing activities.

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.

- ASK ALL

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.

- ASK ALL

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, OR ANY OTHER PERSONAL INFORMATION.

ASK ALL

Could you briefly summarise what personal data your organisation processes and for what purpose?

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

- ASK ALL

How does your organisation source the personal data that you process?

C   Anonymisation and pseudonymisation – 15 minutes

ASK ALL

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

We'd like to start by talking about whether your organisation uses anonymisation or pseudonymisation when processing personal data.

INTERVIEWER NOTE IF A RESPONDENT ASKS FOR EXPLANATION THIS CAN BE PROVIDED, BUT OTHERWISE DO NOT OFFER: Anonymisation is the process of turning personal data into anonymous information, so that it then falls outside the scope of data protection law. Data is anonymised when it does not relate to an identified or identifiable individual or is rendered anonymous in such a way that individuals are not (or are no longer) identifiable.

INTERVIEWER NOTE IF A RESPONDENT ASKS FOR EXPLANATION THIS CAN BE PROVIDED, BUT OTHERWISE DO NOT OFFER: Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

ASK ALL

If at all, how has your organisation used anonymisation or pseudonymisation when processing personal data?

INTERVIEWER NOTE: IF THEY USE BOTH, THEN ASK SPECIFIC PROCESS QUESTIONS FOR EACH THROUGHOUT THIS SECTION.

IF YES, PROBE:

For what purposes do you use anonymisation or pseudonymisation at your organisation?

What data is anonymised or pseudonymised?

How long has your organisation been doing this?

Has your use of anonymisation or pseudonymisation changed over time?

ASK ALL THAT ADOPTED ANONYMISATION OR PSEUDONYMISATION

Could you explain your rationale for implementing anonymisation or pseudonymisation when processing personal data in your organisation?

PROBE FOR

What were the expected benefits and drawbacks of anonymisation or pseudonymisation?

Was there support or pushback from stakeholders – senior leadership, customers, etc?

ASK ALL THAT ADOPTED ANONYMISATION OR PSEUDONYMISATION

Could you explain how the adoption of anonymisation or pseudonymisation when processing personal data has impacted your organisation and your customers?

PROBE FOR

What were the realised benefits and drawbacks of implementing anonymisation or pseudonymisation?

Have all the expected benefits been realised?

ASK ALL THAT ADOPTED ANONYMISATION OR PSEUDONYMISATION

Have you faced any challenges in implementing anonymisation or pseudonymisation when processing personal data?

INTERVIEWER NOTE: IF THEY HAVE ALREADY MENTIONED CHALLENGES, THEN PROBE ON THOSE CHALLENGES SPECIFICALLY. OTHERWISE, PROMPT FOR THE FOLLOWING TYPES OF CHALLENGES:

PROBE:

Risks

Compliance or difficulties in understanding or meeting the regulatory requirements

Challenges by data subjects, for example exercising of rights, complaints or queries

Financial or operational constraints

IF YES: Can you share an example?

IF YES: Were any of these challenges unexpected?

IF YES: Have these challenges changed over time?

IF YES: Were you able to mitigate potential challenges? How?

ASK ALL THAT DID NOT ADOPT ANONYMISATION OR PSEUDONYMISATION

Have you ever considered implementing anonymisation or pseudonymisation when processing personal data in your organisation?

IF YES, PROBE FOR

What was the primary reason for not implementing anonymisation or pseudonymisation?

What were the expected benefits and drawbacks of adopting anonymisation or pseudonymisation to your organisation?

Was there support or pushback from stakeholders – senior leadership, customers, etc?

Did you perceive any challenges in terms of understanding or meeting the legislative requirements for the technology?

ASK ALL

Looking to the future, do you think your use of anonymisation or pseudonymisation when processing personal data will change? If so, how?

PROBE:

Do you see potential for any new benefits or use cases arising in the future? What might these be?

Do you anticipate any new constraints going forward? What might these be?

D   Artificial Intelligence or Artificial Intelligence as a service – 15 minutes

Next, we'd like to understand whether your organisation uses artificial intelligence when processing personal data.

ASK ALL

Could you please explain what you understand the term Artificial Intelligence (AI) to mean?

INTERVIEWER NOTE IF A RESPONDENT ASKS FOR EXPLANATION THIS CAN BE PROVIDED, BUT OTHERWISE DO NOT OFFER: We will use Artificial Intelligence (AI) as an umbrella term for a range of algorithm-based technologies that solve complex tasks by carrying out functions that previously required human thinking.

ASK ALL

If at all, how has your organisation adopted any AI when processing personal data?

Note: We would like to focus on the use of AI where personal data is being processed.

> IF YES, PROBE:
>
> Tell me about the AI technology your organisation uses. (*INTERVIEWER NOTE: THIS COULD INCLUDE THINGS LIKE TECHNIQUES, HARDWARE, SOFTWARE).*
>
> For what purposes do you use AI at your organisation?
>
> Is the process fully automated or is there human review at certain stages?
>
> Tell me about the processes and the different stages of review.
>
> What types of data do you process (special category, children and young adults, criminal, financial) when using AI?
>
> Were there any relevant legislative considerations? (*INTERVIEWER NOTE: UK GDPR*)
>
> How do you explain your use of AI to people affected by them?
>
> How long has your organisation been using AI? How mature do you believe the technology you are adopting is?
>
> Has your use of AI changed over time?

> ASK ALL THAT ADOPTED AI

Could you explain your rationale for implementing AI when processing personal data in your organisation?

> PROBE FOR
>
> What were the expected benefits and drawbacks of adopting AI to your organisation and your customers?
>
> Have you considered alternative technologies? *INTERVIEWER NOTE: KEEN TO UNDERSTAND COMPARATIVE PERFORMANCE, STATISTICAL ACCURACY, UNDERSTANDING OF DATA, ETC*

Was there support or pushback from stakeholders – senior leadership, customers, etc?

ASK ALL THAT ADOPTED AI

Could you explain how the adoption of AI when processing personal data has impacted your organisation and your customers?

PROBE FOR

What were the benefits and drawbacks of implementing AI to your organisations and your customers?

Have all the expected benefits been realised?

ASK ALL THAT ADOPTED AI

Have you faced any challenges in relation to implementing AI when processing personal data in your organisation?

INTERVIEWER NOTE: WE ARE TRYING TO UNDERSTAND WHETHER ORGANISATIONS ARE AWARE OF THE BIASES OR HARMS THAT AI SYSTEMS COULD LEAD TO.

PROBE:

Have you faced any challenges with the quality of the training data used?

Have you faced any challenges with the quality of the output?

INTERVIEWER NOTE: IF THEY HAVE ALREADY MENTIONED CHALLENGES, THEN PROMPT ON THOSE CHALLENGES SPECIFICALLY. OTHERWISE, PROMPT FOR THE FOLLOWING TYPES OF CHALLENGES:

Risks

Compliance or difficulties understanding or meeting the regulatory requirements

Challenges by data subjects, for example exercising of rights, complaints or queries

Financial or operational constraints

IF YES: Can you share an example?

IF YES: Were any of these challenges unexpected?

IF YES: Have these challenges changed over time?

IF YES: Were you able to mitigate potential risks?

ASK ALL THAT DID NOT ADOPT AI

Have you ever considered implementing AI when processing personal data in your organisation?

PROBE FOR

IF YES: What were the expected benefits and what was the primary reason for not implementing AI?

Was there support or pushback from stakeholders – senior leadership, customers, etc?

Did you perceive any challenges in terms of understanding or meeting the legislative requirements for the technology?

ASK ALL

Looking to the future, do you think your use of AI when processing personal data will change? If, so how?

PROBE:

Do you see potential for any new benefits or use cases arising in the future? What might these be?

Do you anticipate any new constraints going forward? What might these be?

E   Automated decision making – 15 minutes

Next, we'd like to understand whether your organisation uses any automated decision making using personal data.

ASK ALL
Could you please explain what you understand the term Automated Decision Making (ADM) to mean?

INTERVIEWER NOTE IF A RESPONDENT ASKS FOR EXPLANATION THIS CAN BE PROVIDED, BUT OTHERWISE DO NOT OFFER: Automated decision-making is the process of making a decision by automated means without any human involvement. These decisions can be based on factual data, as well as on digitally created profiles or inferred data. Examples of this include:
- *an online decision to award a loan; and*
- *an aptitude test used for recruitment which uses pre-programmed algorithms and criteria.*

ASK ALL

If at all, how has your organisation adopted any automated decision making using personal data?

NOTE: IF RESPONDENT EXPLAINS THAT THEIR USE OF ADM IS THE SAME AS WHAT WAS DESCRIBED IN THE AI SECTION, THEN DON'T PROMPT WITH THE SAME QUESTIONS. PROBE TO SEE IF THEY DO ANY ADM THAT DOESN'T USE AI.

IF YES, PROBE:

For what purposes do you use ADM at your organisation?

Tell me about the tech you use to process using ADM?

What types of data do you process (special category, children and young adults, criminal, financial)?

Were there any relevant legislative considerations? (*INTERVIEWER NOTE: UK GDPR*)

How do you explain your ADM to people affected by them?

How long has your organisation been using these systems? How mature do you believe the process you are adopting is?

Has your use of ADM changed over time?

   ASK ALL THAT ADOPTED AUTOMATED DECISION MAKING

Could you explain your rationale for implementing ADM using personal data in your organisation?

PROBE FOR

What were the expected benefits and drawbacks of adopting ADM to your organisation?

Have you considered alternatives to ADM?

Was there support or pushback from stakeholders – senior leadership, customers, etc?

ASK ALL THAT ADOPTED AUTOMATED DECISION MAKING

Could you explain how the adoption of ADM using personal data has impacted your organisation and your customers?

PROBE FOR

What were the benefits and drawbacks of implementing AI to your organisations and your customers?

Have the expected benefits been realised?

ASK ALL THAT ADOPTED AUTOMATED DECISION MAKING

Have you faced any challenges in relation to implementing ADM using personal data in your organisation?

INTERVIEWER NOTE: WE ARE TRYING TO UNDERSTAND WHETHER ORGANISATIONS ARE AWARE OF THE BIASES OR HARMS THAT AUTOMATED DECISION MAKING COULD LEAD TO.

PROBE:

Have you faced any challenges with the quality of the input data used?

Have you faced any challenges with the quality of the decisions?

INTERVIEWER NOTE: IF THEY HAVE MENTION THEIR OWN CHALLENGES, THEN PROBE ON THOSE CHALLENGES SPECIFICALLY. OTHERWISE, PROMPT FOR THE FOLLOWING TYPES OF CHALLENGES:

Risks

Compliance or difficulties in understanding or meeting the regulatory requirements

Challenges by data subjects, for example exercising of rights, complaints or queries

Financial or operational constraints

IF YES: Can you share an example challenge?

IF YES: Were any of these challenges unexpected?

IF YES: Have these challenges changed over time? IF YES: Were you able to mitigate potential risks?

IF NO AT QUESTION 19 ASK ALL THAT DID NOT ADOPT AUTOMATED DECISION MAKING

Have you ever considered implementing automated decision using personal data making in your organisation?

PROBE FOR

What were the expected benefits and what was the primary reason for not implementing ADM?

Was there support or pushback from stakeholders – senior leadership, customers, etc?

Did you perceive any challenges in understanding or meeting the legislative requirements for the technology?

ASK ALL

Looking to the future, do you think your use of ADM using personal data will change? If so, how?

PROBE:

Do you see potential for any new benefits or use cases arising in the future? What might these be?

Do you anticipate any new constraints going forward? What might these be?

F   Facial and biometric recognition technology – 15 minutes

Finally, we'd like to talk about whether your organisation uses any facial or biometric recognition technology.

INTERVIEWER NOTE IF A RESPONDENT ASKS FOR EXPLANATION THIS CAN BE PROVIDED, BUT OTHERWISE DO NOT OFFER: Biometric recognition refers to the automated recognition of people based on their biological or behavioural characteristics.

Note: If respondent has already explained AI or ADM systems that uses facial or biometric recognition technology, then acknowledge that respondents have mentioned this. Use this section to probe additional questions specific to the processing of facial or biometric data where suitable.

ASK ALL

If at all, how has your organisation any facial or biometric recognition technology at your organisation?

IF YES, PROBE:

For what purposes do you use facial or biometric recognition technology at your organisation?

What type of biometric data do you process (face, fingerprint, iris scan, etc)?

Whose biometric data do you process (employee, customer, etc)?

How do you explain your use of facial and biometric technology to people affected by them?

How long has your organisation been using this technology? How mature do you believe the technology you are adopting is?

Has your use of facial or biometric recognition technology changed over time?

ASK ALL THAT ADOPTED FACIAL OR BIOMETRIC RECOGNITION TECHNOLOGY

Could you explain your rationale for implementing facial or biometric recognition technology in your organisation?

PROBE FOR

What were the expected benefits or drawbacks of adopting facial or biometric recognition technology?

Have you considered alternative technologies? *INTERVIEWER NOTE: KEEN TO UNDERSTAND COMPARATIVE PERFORMANCE, STATISTICAL ACCURACY, UNDERSTANDING OF DATA, ETC*

Was there support or pushback from stakeholders – senior leadership, customers, etc?

ASK ALL THAT ADOPTED FACIAL OR BIOMETRIC RECOGNITION TECHNOLOGY

Could you explain how the adoption of facial or biometric recognition technology has impacted your organisation and your customers?

PROBE FOR

What were the benefits and drawbacks of implementing AI to your organisations and your customers?

Have the expected benefits been realised?

ASK ALL THAT ADOPTED FACIAL OR BIOMETRIC RECOGNITION TECHNOLOGY

Have you faced any challenges in relation to implementing facial or biometric recognition technology in your organisation?

PROBE:

Have you faced any challenges with the quality of the decisions? Have you received any complaints?

INTERVIEWER NOTE: IF THEY HAVE MENTION THEIR OWN CHALLENGES, THEN PROBE ON THOSE CHALLENGES SPECIFICALLY. OTHERWISE, PROMPT FOR THE FOLLOWING TYPES OF CHALLENGES:

Risks

Compliance or difficulties in understanding or meeting the regulatory requirements

Challenges by data subjects, for example exercising of rights, complaints or queries

Financial or operational constraints

IF YES: Can you share an example?

IF YES: Were any of these challenges unexpected?

IF YES: Have these challenges changed over time?

IF YES: Did any of these challenges result in complaints?

ASK ALL THAT DID NOT ADOPT FACIAL OR BIOMETRIC RECOGNITION TECHNOLOGY

Have you ever considered implementing facial or biometric recognition technology in your organisation?

PROBE FOR

What were the expected benefits and what was the primary reason for not implementing facial or biometric recognition technology?

Was there support or pushback from stakeholders – senior leadership, customers, etc?

Did you perceive any challenges in understanding or meeting the legislative requirements for the technology?

ASK ALL

Looking to the future, do you think your use of facial or biometric recognition technology will change? If so, how?

PROBE:

Do you see potential for any new benefits or use cases arising in the future? What might these be?

Do you anticipate any new constraints going forward? What might these be?

G   Other tech – 2 minutes

ASK ALL

Are there any important technologies that your organisation uses for processing personal data that we haven't explored in this conversation or in the survey?

PROBE:

What would you say is the most influential technology your organisation uses to process personal data?

Why was this the most influential? What were the benefits of adopting this technology?

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

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?

ASK PRIVATE SECTOR AND NON PROFIT

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 this via PayPal, Wise Transfer or through a charity donation from a pre-selected list of charities. Which of these would you like us to process?

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.

IF NEEDED: Wise Transfer - A payment is sent through Wise using respondent's full name and email address. They will then receive an email from Wise notifying them that we have sent them the payment with the instruction to give their bank details so Wise can securely transfer the payment to their bank account. Respondents need to claim their payment within one week of receiving the email from Wise.

Paypal	
Wise transfer	
Charity donation	

[IF SELECTED WISE OR PAYPAL]: Please can you confirm your email address for us to send the payment,

WRITE IN RELEVANT DETAILS (RESPONDENT NAME AND EMAIL ADDRESS)

[IF SELECTED WISE OR PAYPAL]: Which of the following charities would you like us to donate to?

Great Ormond Street Hospital	
British Heart Foundation	
Macmillan Cancer Support	

Shelter	
Celia Hammond Animal Trust	
Mind	

ASK CENTRAL OR LOCAL GOVERNMENT

I2 **As mentioned at the start of the interview, as a thank you for taking part we would like to offer you a £50 charity donation from a pre-selected list of charities.**

Which of the following charities would you like us to donate to?

Great Ormond Street Hospital	
British Heart Foundation	
Macmillan Cancer Support	
Shelter	
Celia Hammond Animal Trust	
Mind	

ASK ALL

Thank you very much for taking the time to speak to us today. Would you be willing for us to call you back regarding:

This particular study – if we need to clarify any of the information	Yes	No

IF CONSENT TO RECONTACT

And could I just check, is [NUMBER] the best number to call you on?

Yes	1	
No - write in number	2	

THANK AND CLOSE

On behalf of the ICO and IFF Research, thank you very much for taking the time to speak to me about this important research.

Just to confirm, we will be keeping your anonymised responses to the interview for analysis purposes, and if you would like a copy of your data, to change your data, or for your data to be deleted then please get in contact with Annie Avis (annie.avis@iffresearch.com).

IF NECESSARY:

You also have a 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 declare that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct.
Interviewer signature:

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.

IFF Research