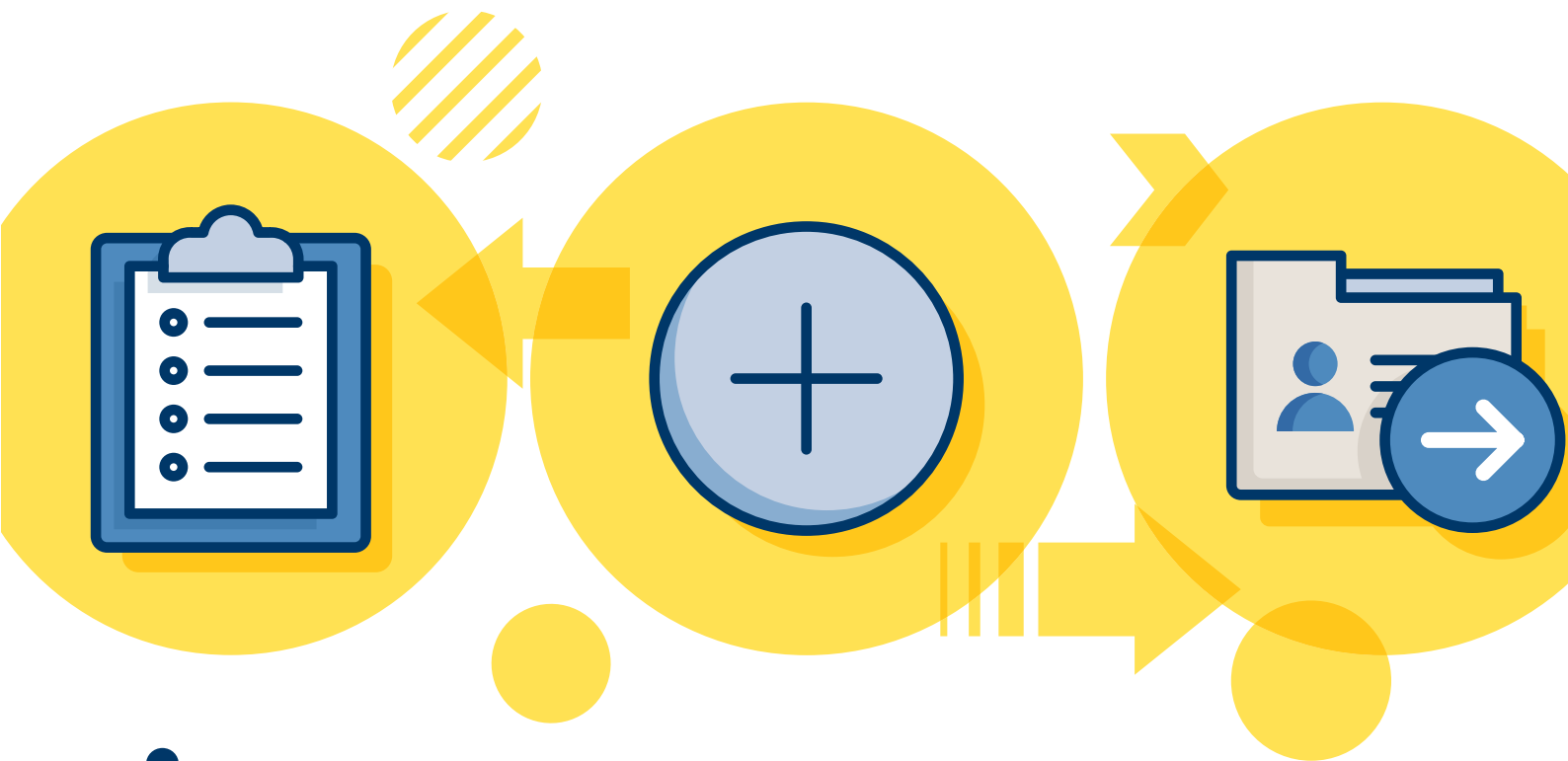


SME Data Essentials pilot final evaluation – technical research and analysis annexes

Economic analysis – impact and evaluation

February 2023



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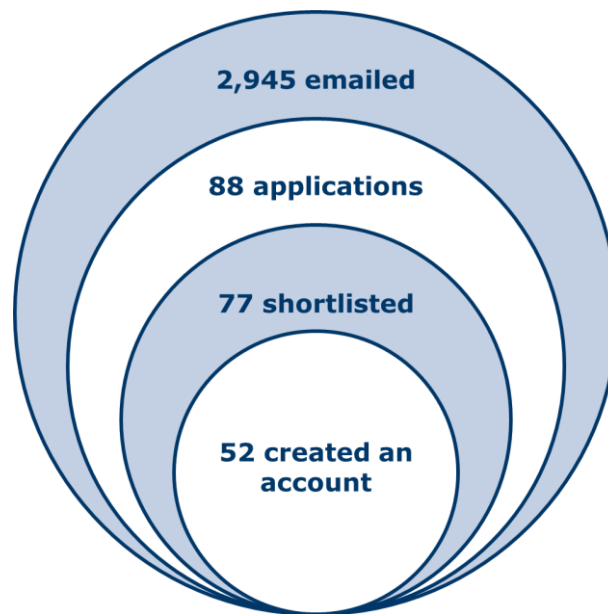
Annex A: SME characteristics and prior knowledge

Annex A presents analysis of the profile and characteristics of the Pilot’s participants based on the information captured by the ICO at sign-up. As discussed in the main report, 2,945 invitation emails were sent to data protection (DP) fee payers.

- 88 organisations expressed their interest, and from these, 77 organisations were shortlisted to participate.
- 52 of these shortlisted organisations created an account on the platform.

This Annex analyses and compares the cohort of 77 shortlisted organisations and the 52 organisations who created an account (active participants).

Figure 1: Pilot engagement



Source: ICO’s Economic Analysis team. Please note this diagram is not to scale.

The majority of shortlisted organisations were located in England, with close to a third of these concentrated in London (see Table 1). The location of organisations shortlisted for the Pilot broadly reflect the distribution of similar-sized businesses across the UK. There were a few notable exceptions: organisations in London and East Anglia were overrepresented in the selection, and organisations in the South East of England and West Yorkshire were underrepresented.

Table 1 also shows the distribution of active participants compared to the distribution of the UK SME business base. Take-up (ie share of shortlisted

organisations that have created an account) varied by region. In Wales and in East Anglia, only half of the shortlisted organisations have signed up, compared to Scotland where all shortlisted organisations have.

This analysis suggests that outreach has been generally effective in recruiting organisations around the UK. Whilst this is not of immediate concern for the success of the Pilot, future iterations should seek higher engagement outside of London (in particular, the South East of England and West Yorkshire).

Table 1: Active participants' locations

Location	Pilot			All UK SMEs ¹
	No.	% of all active	% active from shortlisted	
England	45	87%	65%	87%
East Anglia	5	10%	50%	10%
East Midlands	3	6%	100%	7%
London	15	29%	63%	19%
North East	1	2%	100%	3%
North West	4	8%	67%	10%
South East	6	12%	67%	15%
South West	4	8%	67%	9%
West Midlands	6	12%	67%	8%
West Yorkshire	1	2%	100%	7%
Northern Ireland	1	2%	100%	3%
Scotland	5	10%	100%	6%
Wales	1	2%	50%	4%
Total	52	100%	68%	100%

Source: Pilot monitoring data and ONS (2022) UK business: activity, size and location.

Shortlisted organisations' names were cross-referenced with Companies House and the charity register to obtain information on the type of organisation and their sector. Figure 2 shows the classification of shortlisted and active participants into businesses and not-for-profit² organisations.

- Businesses accounted for the majority of shortlisted organisations and active participants (66% and 62% respectively).

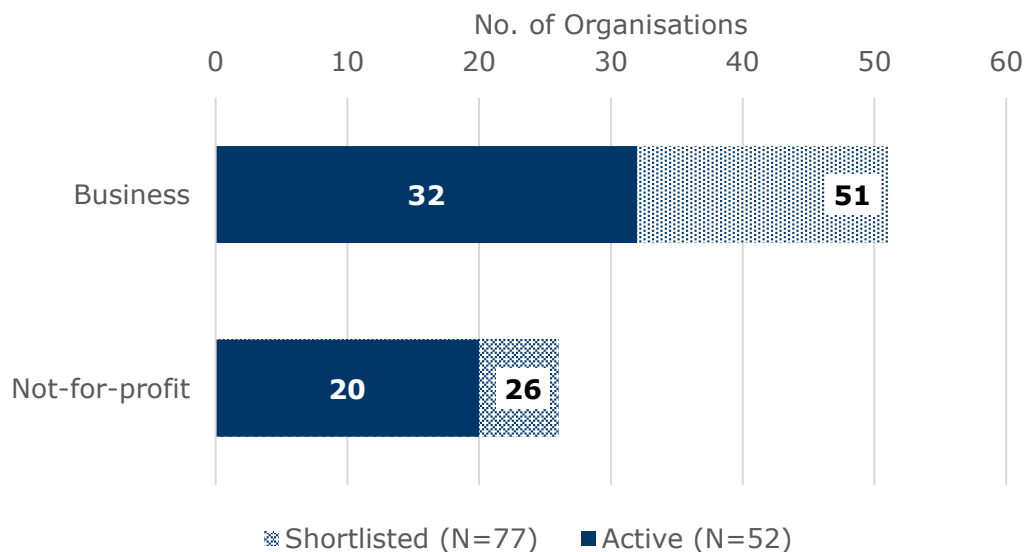
¹ The ONS's definition of an SME and the ICO's eligibility criteria for the Pilot are likely to differ making the two not directly comparable – this is however a useful proxy.

² These includes charities, trade bodies, and public bodies.

- Not-for-profit organisations had a higher take-up compared to businesses: 77% of shortlisted not-profit organisation activated their account, higher than 63% of businesses.

While not-for-profit organisations can deliver substantial social and economic impacts, they tend to have strategic objectives that differ from those of a business. This makes not-for-profit organisations less well placed to directly contribute to the ICO25 goal of creating sustainable economic growth³, which is the goal that the Pilot sits under in the ICO25 action plan.⁴ Businesses, on the other hand, are a more suited candidate to engage with when progressing this growth-related goal. It is worth noting, however, that engaging not-for-profit organisations allows the ICO to reach more vulnerable parts of the population, therefore contributing to another of the ICO25 goals.⁵ While engaging with both not-for-profit organisations and businesses can help work towards two distinct ICO25 goals, delivering one form of intervention to two distinct target audiences risks diluting and understating the contribution.

Figure 2: Shortlisted and active participants by type



Source: Pilot monitoring data and internal analysis by ICO’s Economic Analysis team.

Table 2 shows the breakdown of sectors for active participants who are businesses. The most common sector was ‘Professional, scientific and technical activities’, followed by ‘Administrative and support service

³ ICO25 objective 2: empower responsible innovation and sustainable economic growth.

⁴ ICO (2022) [Annual action plan: October 2022 – October 2023](#)

⁵ ICO25 objective 1: safeguard and empower people, especially the most vulnerable.

activities'. The latter also had higher than average take-up (80% vs 68%). One sector that had poor take-up was 'Financial and insurance activities', where neither of the two shortlisted businesses created an account.

Table 2: Sectors of active business participants

Sector	Pilot		
	No.	% of all active	% active from shortlisted
Administrative and support service activities	8	25%	80%
Arts, entertainment and recreation	2	6%	67%
Education	2	6%	100%
Financial and insurance activities	0	0%	0%
Human health and social work activities	3	9%	60%
Information and communication	3	9%	100%
Professional, scientific and technical activities	11	34%	58%
Real estate activities	1	3%	100%
Other service activities	1	3%	33%
N/A	1	3%	33%
Total	32	100%	63%

Source: Pilot monitoring data and Companies House.⁶

In line with the overall UK SME population, the majority of organisations who were shortlisted for, and were active in, the Pilot had fewer than 10 members of staff. However, both the shortlisted and the active cohorts had higher shares of organisations, with between 10 and 49 staff and over 50 staff compared to all UK SMEs. Table 3 also shows that larger shortlisted organisations were more likely to have activated their account compared to smaller ones. This means larger organisations were overrepresented in the Pilot relative to all UK SMEs.

Table 3: Active participants' staff size

Staff	Pilot			All UK SMEs ⁷
	No.	% of all active	% active from shortlisted	
0 staff	7	13%	47%	90%
1-9	29	56%	67%	
10-49	7	13%	78%	8%
50-249	8	15%	89%	2%

⁶ Companies House - GOV.UK (www.gov.uk)

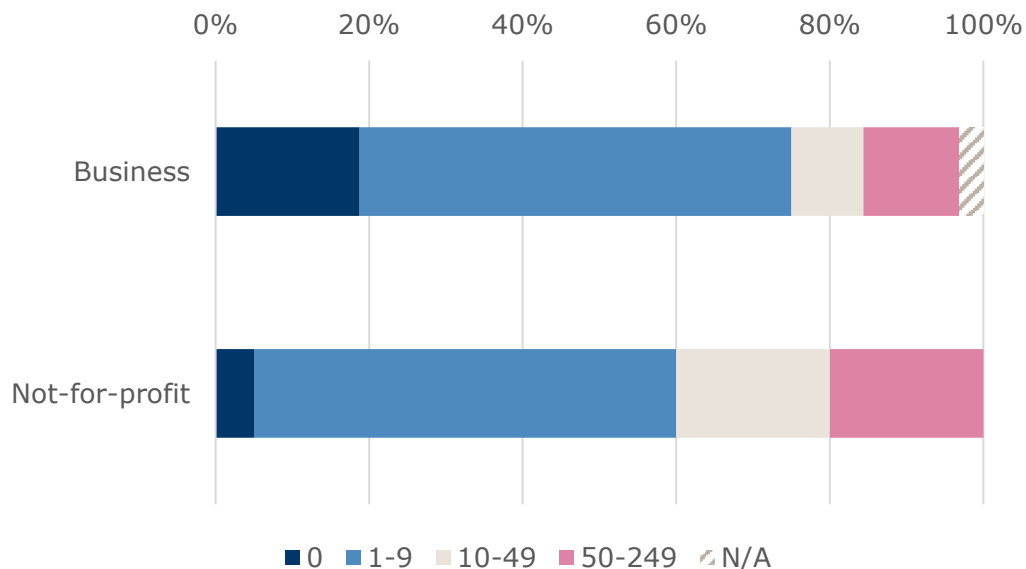
⁷ The ONS's definition of an SME and the ICO's eligibility criteria for the Pilot are likely to differ making the two not directly comparable – this is however a useful proxy.

N/A	1	2%	100%	-
Total	52	100%	68%	100%

Source: Pilot monitoring data and ONS.⁸

As Figure 3 shows, it is not-for-profit organisations that drive the larger-than-average size of active participants. Businesses that have activated their account are more likely to be micro, compared to their not-for-profit peers, and less likely to have 10 or more staff.

Figure 3: Active participants' staff size by organisation type



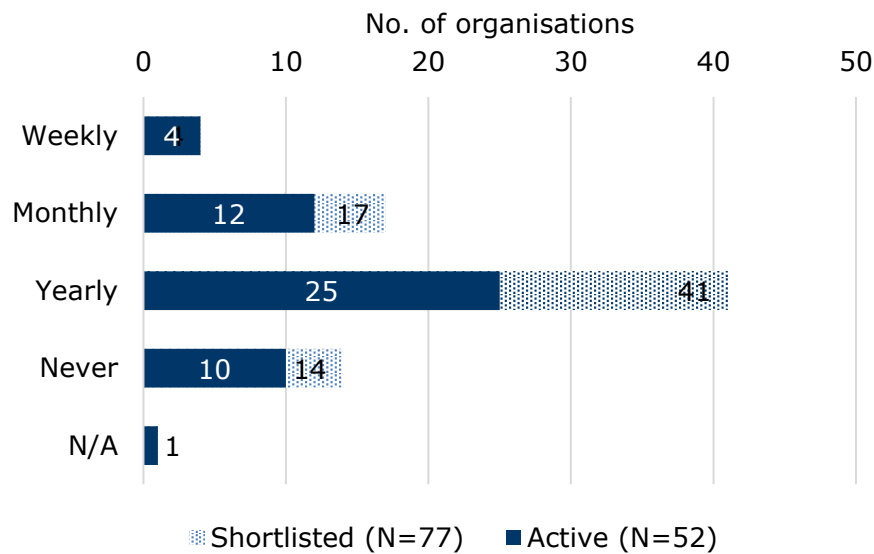
Source: Pilot monitoring data and analysis by ICO's Economic Analysis team.

Analysis of Pilot participant application data shows that half of the shortlisted organisations visited the ICO website yearly, and approximately 20% had never visited the ICO website, prior to engaging with the Pilot. Figure 4 shows that close to a third of active participants visited it more frequently.

There was no evidence of a link between take-up and the frequency of visiting the ICO website. That said, organisations that were already familiar with the ICO and its work were more likely to engage early, with the less familiar organisations taking more time to engage.

⁸ UK Business Counts, data retrieved from [Nomis](#)

Figure 4: Shortlisted organisations and active participants' frequency visiting ICO website



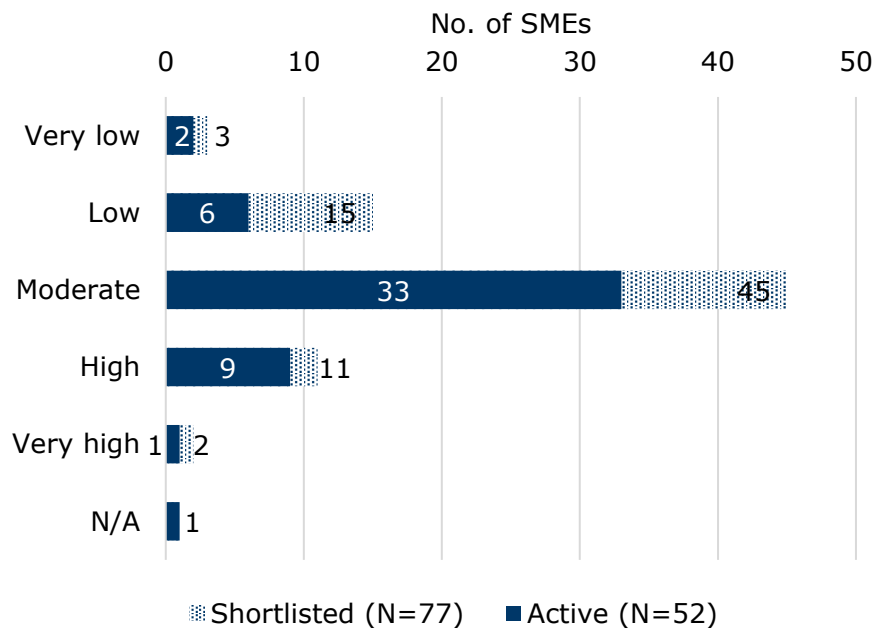
Source: Pilot monitoring data.

The majority of active participants indicated they had an average knowledge level, and the number of active participants decreased almost symmetrically going from moderate to very low and from moderate to very high. This means that the selection of the Pilot group was not skewed towards organisations with very low or very high knowledge.

Accessing the ICO website more often was linked to better data protection knowledge. Shortlisted SMEs who had never accessed the ICO website had very low to moderate knowledge, while shortlisted SMEs who accessed the ICO website weekly had moderate to high knowledge. This general trend remained true for the active cohort.

Account activation following shortlisting was the lowest for SMEs with low data protection knowledge. Only six out of the 15 shortlisted SMEs at this level activated their account. This represents a 40% take-up rate, considerably lower than the 68% take-up across the whole sample.

Figure 5: Shortlisted organisations and active participants' data protection knowledge level



Source: Pilot monitoring data.

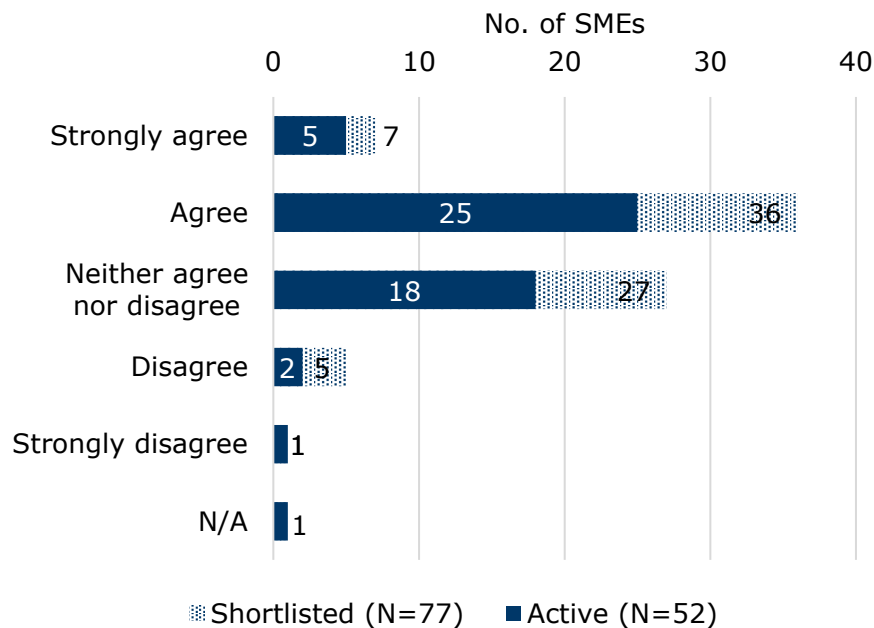
Across the entire shortlisted cohort, prior to engaging with the Pilot:

- 56% of shortlisted organisations strongly agreed or agreed that they were confident that their business got data protection right;
- 35% neither agree nor disagree; and
- 8% strongly disagreed or disagreed.

Only a handful of organisations who did not feel confident expressed interest in the Pilot and only three of these created an account.

Engagement was more likely from organisations that were more confident with their knowledge and application of data protection. This finding reinforces the idea that organisations with an ongoing interest in data protection were more likely to participate in the Pilot. Whilst expected given the nature of a Pilot, scaling up future Project iterations would reach organisations with less confidence in their knowledge of data protection, creating implications for take-up and completion rates.

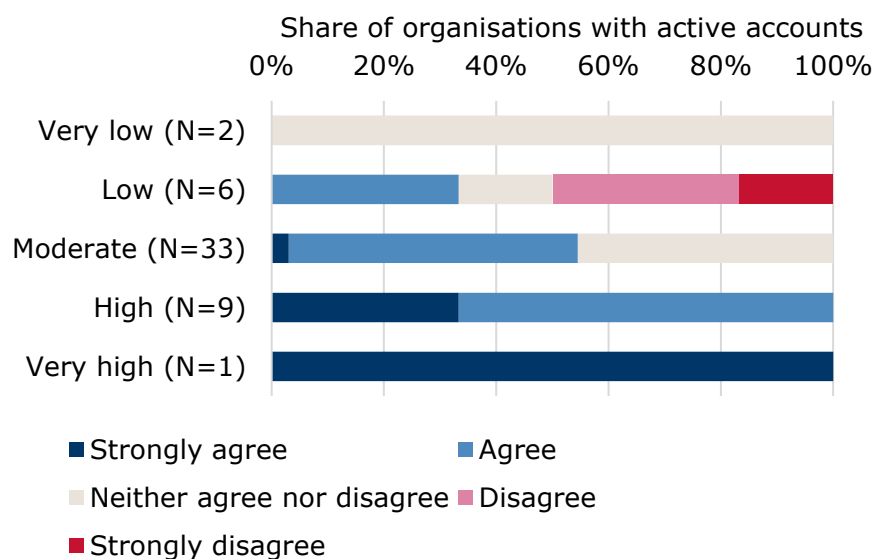
Figure 6: Shortlisted organisations and active participants' agreeing with "I'm confident that my business gets data protection right"



Source: Pilot monitoring data.

The level of confidence, in their application of data protection regulation prior to the Pilot, differed depending on the participant's data protection knowledge level. Figure 7 shows that active participants with lower knowledge levels were generally less confident that their business got data protection right, while active participants with higher knowledge levels were more confident. This trend was true for the wider cohort of shortlisted organisations as well.

Figure 7: Active participants level of agreement with "I'm confident that my business gets data protection right" by knowledge level

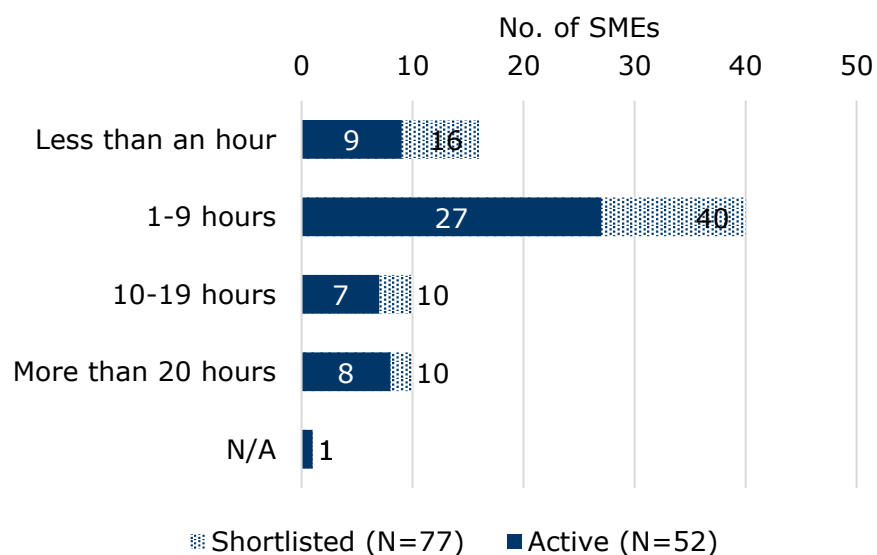


Source: Pilot monitoring data.

Organisations were asked how much time their business dedicated annually to learning about data protection and UK GDPR, or making changes to improve their compliance prior to the Pilot, as shown in Figure 8. One fifth of shortlisted organisations indicated they spent less than an hour on this annually, and about half of shortlisted organisations spent between one and nine hours. Generally, shortlisted organisations who invested less time in ensuring they were up to date in their data protection knowledge and compliance tended to have lower levels of data protection knowledge.

Take-up was higher amongst shortlisted organisations who spent more time learning and making changes. This is unsurprising given the Pilot is a form of learning about data protection.

Figure 8: Organisations' time spent learning or making changes (annually)



Source: Pilot monitoring data.

Overall, the Pilot was successful at engaging organisations who already valued data protection, who believed they had moderate to high data protection knowledge, and who were already implementing this knowledge. Engaging organisations who are less confident in their data protection knowledge and implementation, and who generally interact less with the ICO, might prove to be more challenging. This is a factor that will need to be considered for future phases of SME DE.

It should also be noted that participation in the Pilot required a time commitment on a relatively short timeframe. This could have discouraged some organisations.

Asked how much they spent on average in a year on data protection, the majority of organisations say they did not spend anything.

- This is the case for almost four out of five shortlisted organisations as well as organisations with active accounts.
- With only one fifth of organisations spending a positive amount on data protection, active participants had a higher average spend than shortlisted organisations at approximately £800 compared to about £660.

These are likely only direct costs and do not include the value of the time and effort spent on data protection within the organisation, and should therefore be taken with extreme caution. It does indicate relatively low levels of financial spend are committed to data protection issues.

Annex B: Module feedback surveys

This Annex explores the feedback surveys for modules 1-2, 3-4, 5-8, and 9-11. These were sent out between 9 September and 30 November 2022, with responses accepted until 16 December 2022.

As described in the main report, the number of responses varies across surveys, from a maximum of 22 responses to the feedback survey for modules 1-2 to a minimum of eight responses to the feedback survey for modules 5-8. This makes comparison between modules complicated. For example, it is possible, that the feedback for modules 1-2 is more negative than the feedback for modules 5-8 because the former includes participants who struggled with some features of the Pilot and decided not to carry on with the modules. Thus, when comparing feedback across modules, it should be borne in mind that the characteristics of cohorts of respondent will vary.

Overall, six respondents filled in every module feedback survey. We have identified this as the 'constant cohort', and in this case comparison between modules is possible. However, the constant cohort is relatively small and would not be considered robustly representative of the entire group of organisations who created an account.

To overcome this challenge we have used the two streams of evidence:

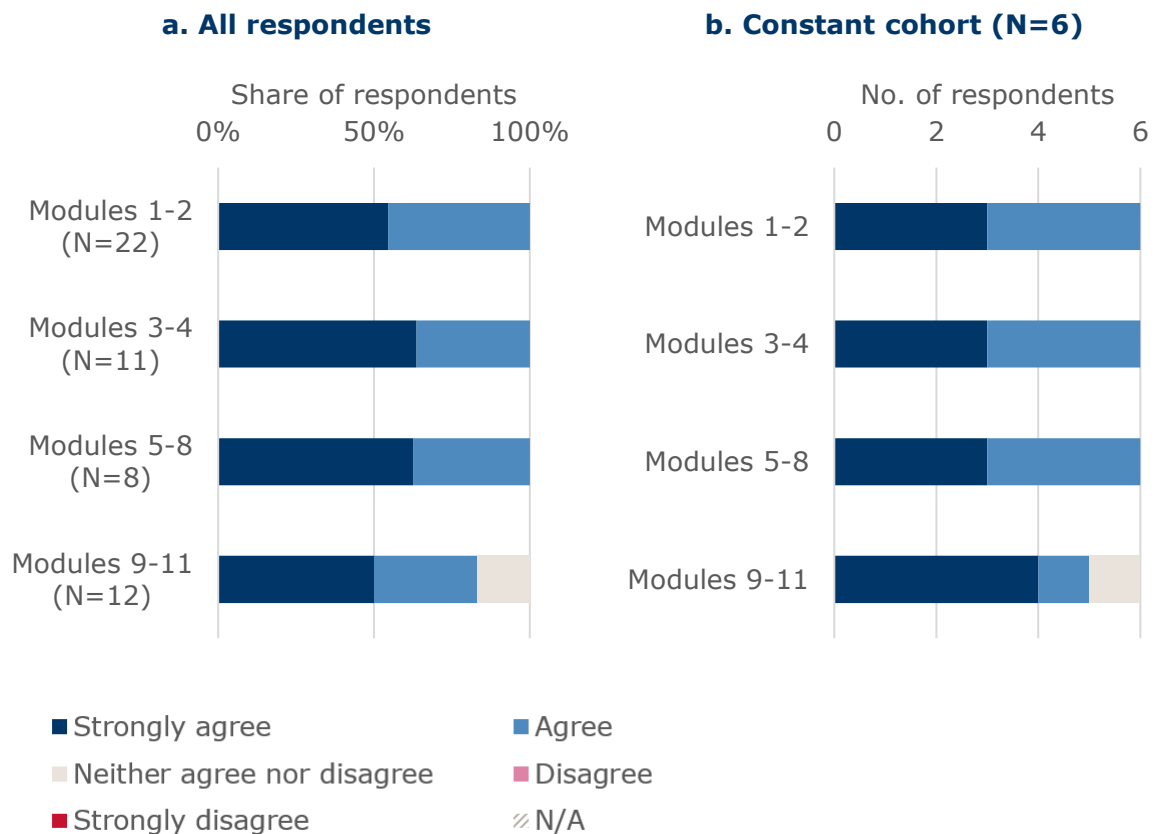
- panel a: all respondents (ie everyone that completed a module feedback survey); and
- panel b: the constant cohort.

We use the constant cohort to corroborate the findings that emerge from analysing all survey responses. And where the former validates the latter, we can be relatively confident that our findings are robust.

B.1. Feedback on content

Throughout the modules, respondents agreed that the vast majority of the content felt relevant, as seen in Figure 9. Some of the content of modules 9-11, which covered marketing, international transfers, and training, felt less relevant to some respondents, though other respondents noted that "the bits that weren't relevant to all were clearly marked".

Figure 9: 'The content feels relevant'

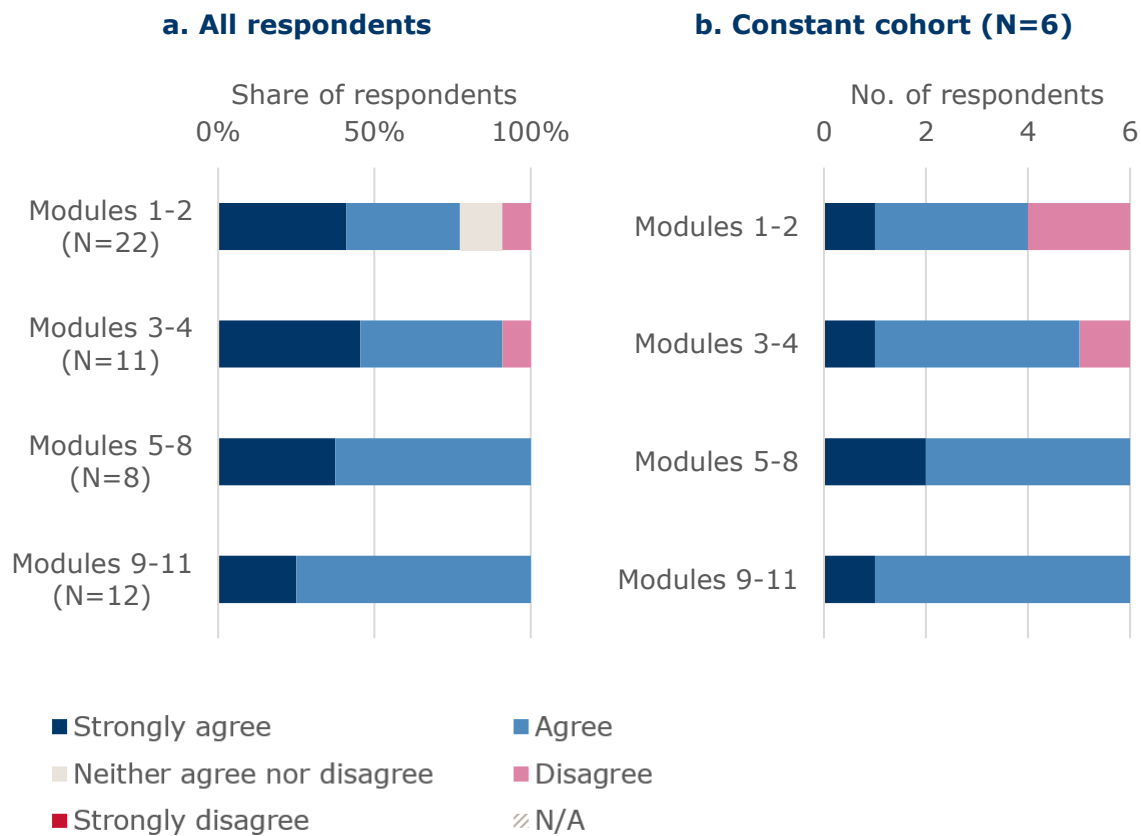


Source: Module feedback surveys.

Figure 10 shows that the content was initially not easy to understand for all, but this improved as the modules progressed, with all respondents agreeing or strongly agreeing that modules from 5 to 11 were easy to understand. The ICO team, reacting to early feedback to make the material easier to approach, contributed to this improvement. The evidence in Figure 10 also suggests that, while still reasonably easy to understand, modules 9-11 were not as easy to understand as modules 5-8.

Respondents often cited how helpful examples were in illustrating how rules apply, and in making the content easier to digest. One respondent cited “examples, particularly in rarer use cases, and links to further information for complex areas” as the most useful aspect of modules 5-8.

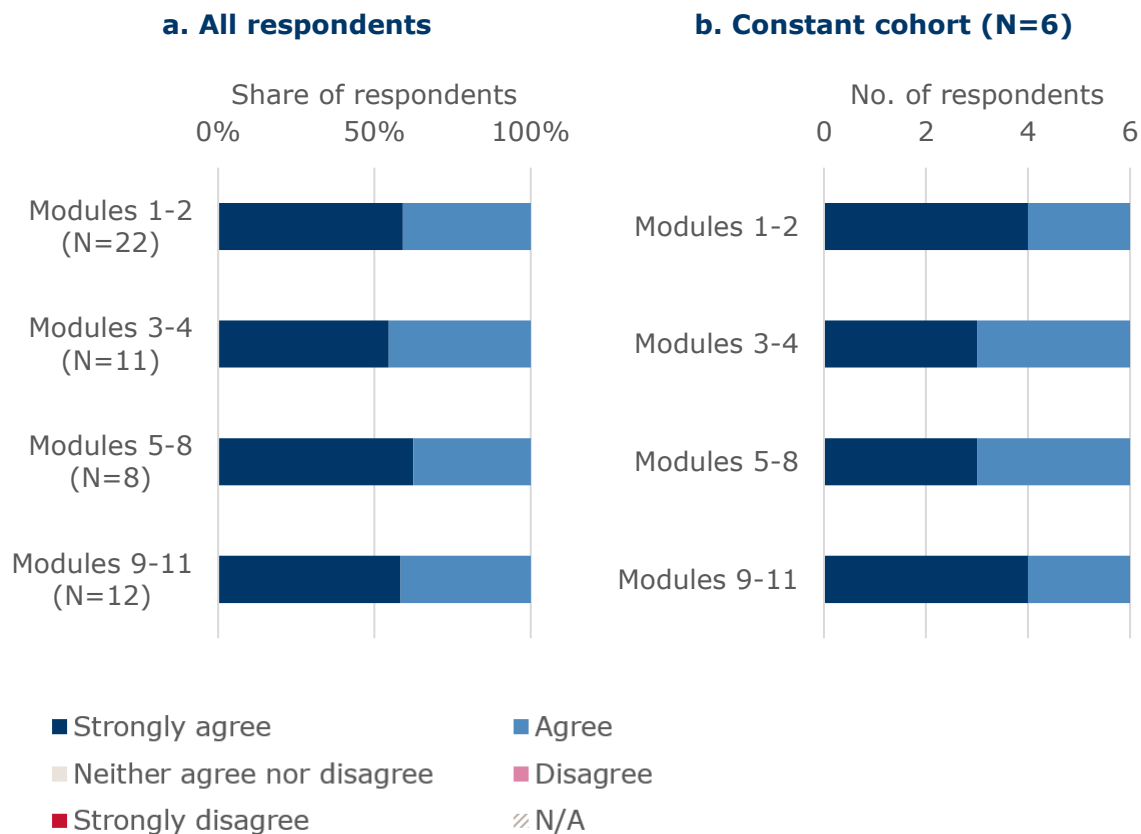
Figure 10: 'The content is easy to understand'



Source: Module feedback surveys.

All respondents found the content informative for all modules, as shown in Figure 11. Respondents indicated that the Pilot both built new knowledge and it clarified information they were not sure about. One respondent said “My awareness has been hugely enhanced. All kinds of things that I would not have classed as data I now will”.

Figure 11: 'The content is informative'

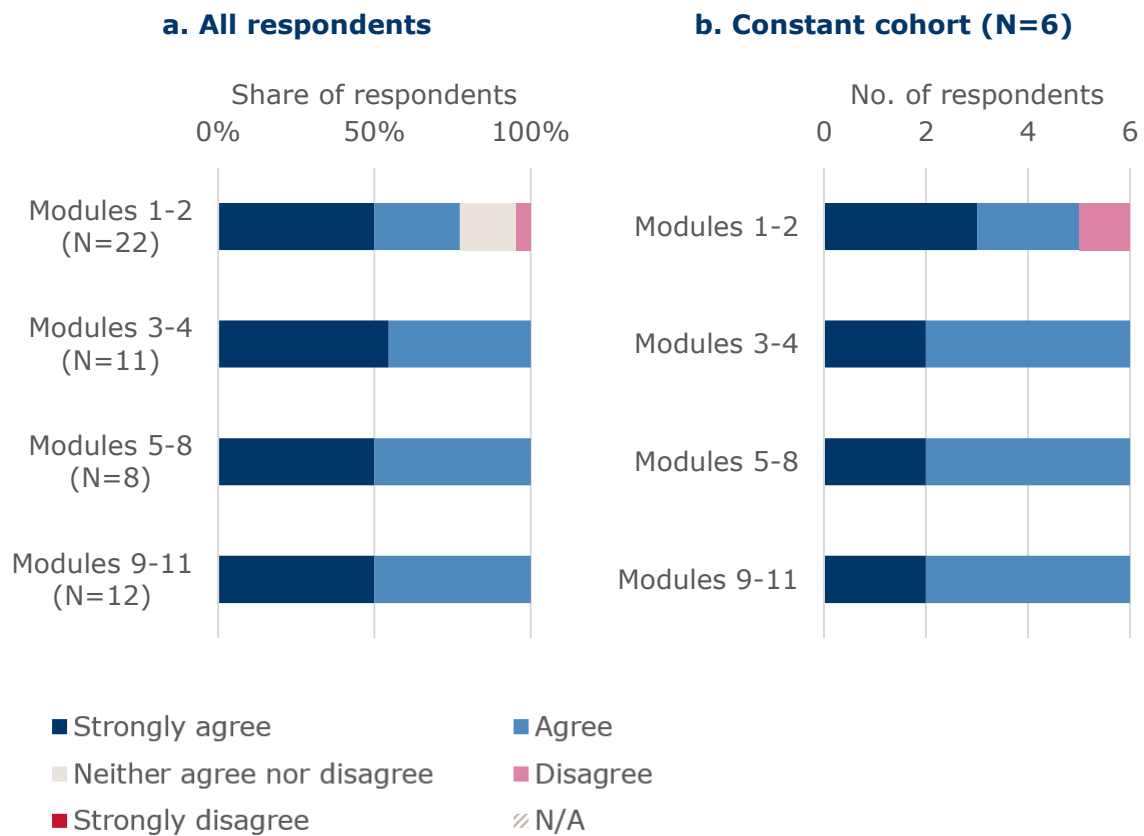


Source: Module feedback surveys.

Figure 12 shows that the language was initially found to be unclear by some respondents in modules 1-2; this later improved and was clear to all respondents for modules 3-11. The results suggest that unclear language in earlier modules might be partially responsible for the content not always being easy to understand (Figure 10).

In the feedback survey for modules 5-8, one respondent shared how the modules were easier to absorb when “much of the language and the concepts were more everyday experience of security on many aspects of ordinary records as well as professional/company data”.

Figure 12: 'The language used is clear'

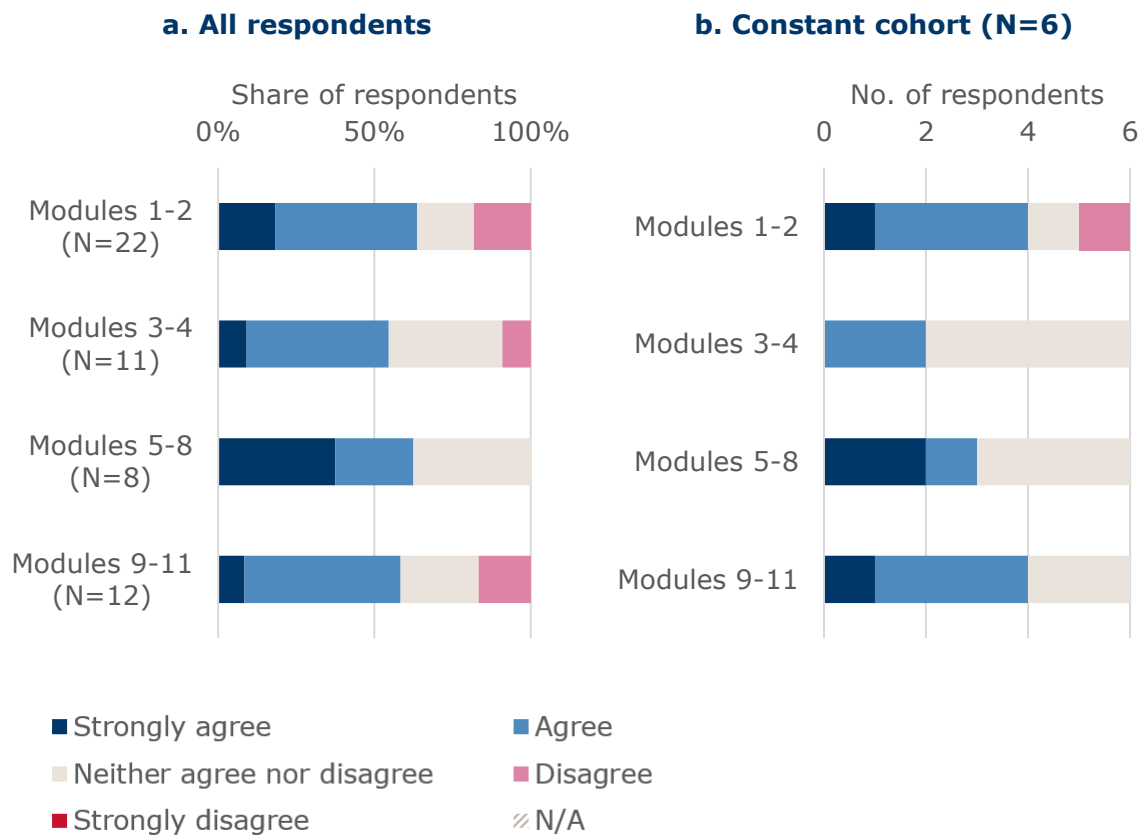


Source: Module feedback surveys.

B.2. Feedback on navigation, look and feel

Figure 13 clearly shows that some respondents did not find navigating through modules 1-2 easy. Panel b confirms that not all respondents agreed that navigation was easy for any of the modules. However, it is not possible to say with confidence whether the ease of navigation improved in later modules.

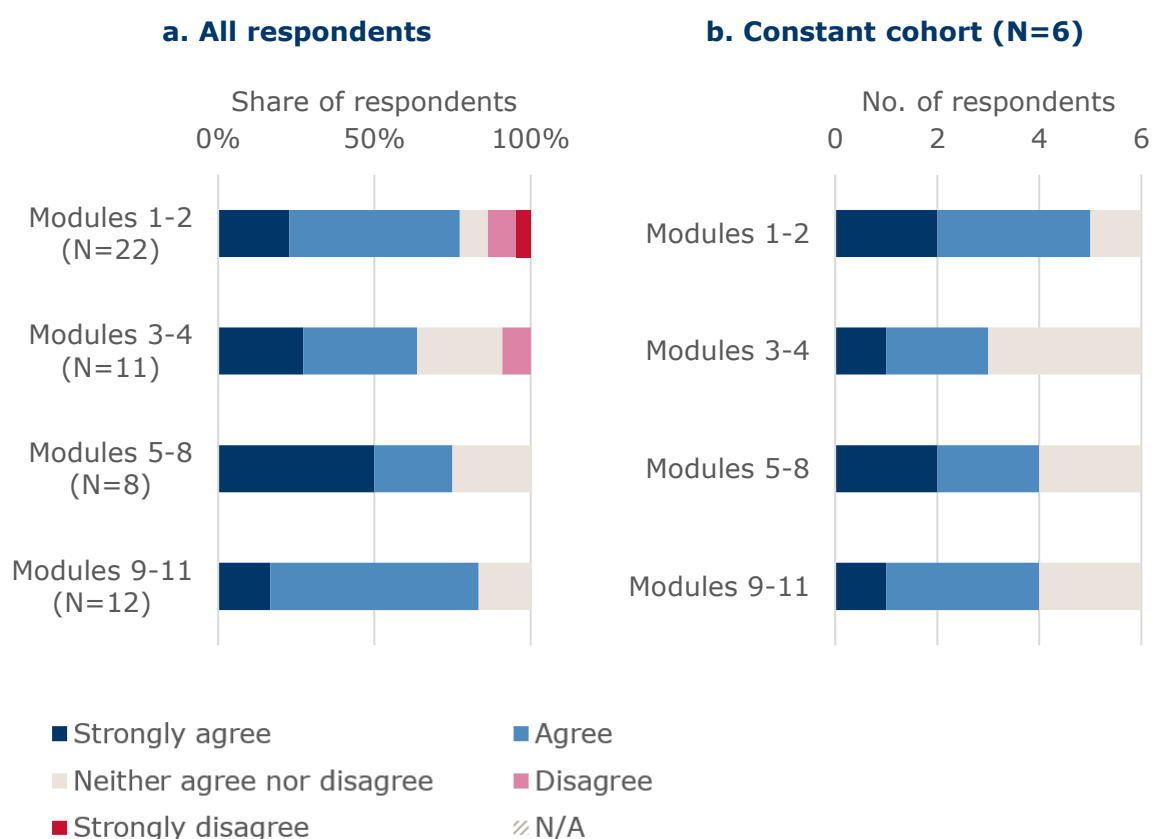
Figure 13: 'It's easy to navigate through the modules'



Source: Module feedback surveys.

Panel a of Figure 14 suggests that the look and feel of the modules might have improved from modules 1-4 to modules 5-11, however it is not possible to corroborate this as the feedback from the constant cohort has not seen a meaningful persistent improvement.

Figure 14: 'I like the look and feel of the modules'



Source: Module feedback surveys.

Modules 1-2 and modules 9-11 were the two groups of modules that saw the most respondents reporting issues, as shown in Table 4. It should be noted that multiple respondents could be reporting the same issue. Thus, Table 4 should not be interpreted to mean that modules 1-2 and 9-11 had a higher number of issues, rather that these module batches had issues that affected more respondents.

Table 4: Respondents reporting issues

Survey	No. of respondents who had issues	Total no. of respondents	% of respondents who had issues
Modules 1-2 feedback	8	22	36%
Modules 3-4 feedback	2	11	18%
Modules 5-8 feedback	2	8	25%
Modules 9-11 feedback	6	12	50%

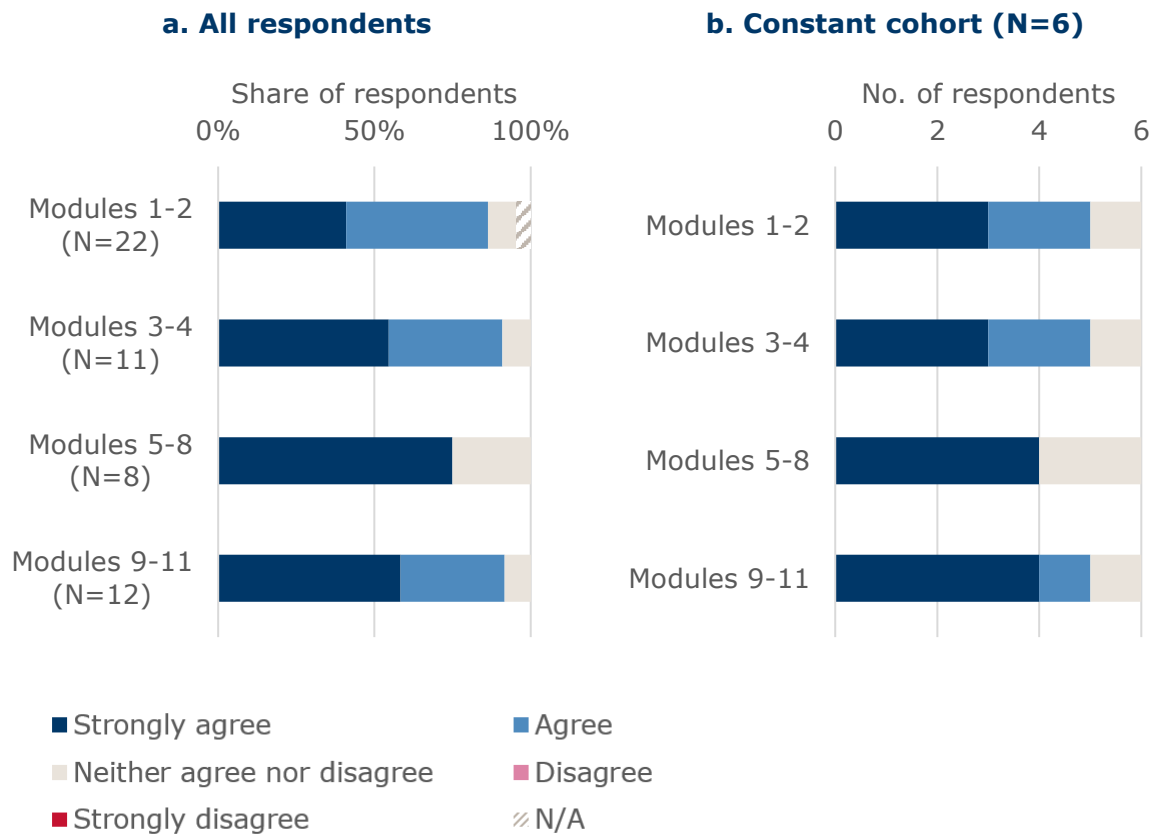
Source: Module feedback surveys.

B.3. Feedback on Impacts

Most respondents felt more confident handling personal data after completing each of the batches of modules, suggesting that all material

contributed to building their confidence. Figure 15 indicates that modules 5-8, while still improving on the majority of respondents' confidence, had the lowest levels of impact on confidence amongst all modules.

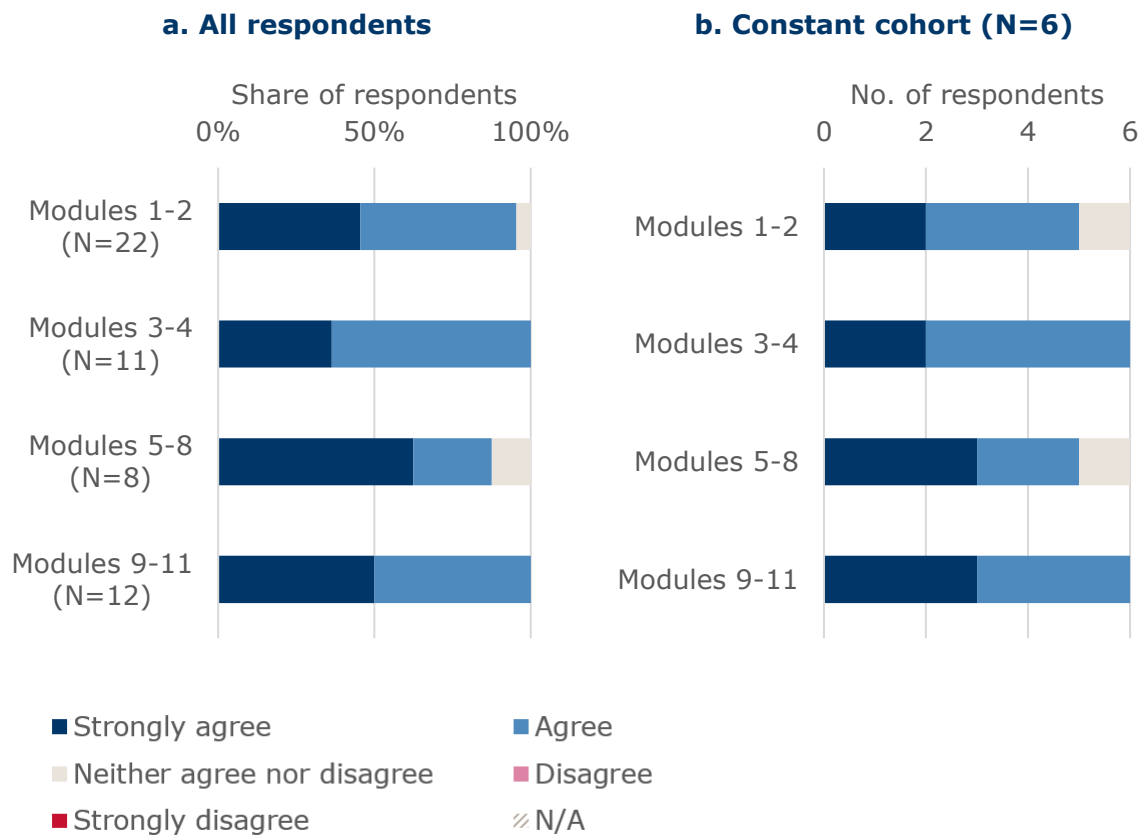
Figure 15: 'I feel more confident handling personal data'



Source: Module feedback surveys.

Most respondents found the content of the modules applicable, as all, or almost all, agreed that they could see how they would use what they'd learnt in their job (see Figure 16). Nobody disagreed with being able to apply what they'd learnt, which is positive. Modules 5-8 seem to be the most polarising, with the highest shares of respondents strongly agreeing and being neutral.

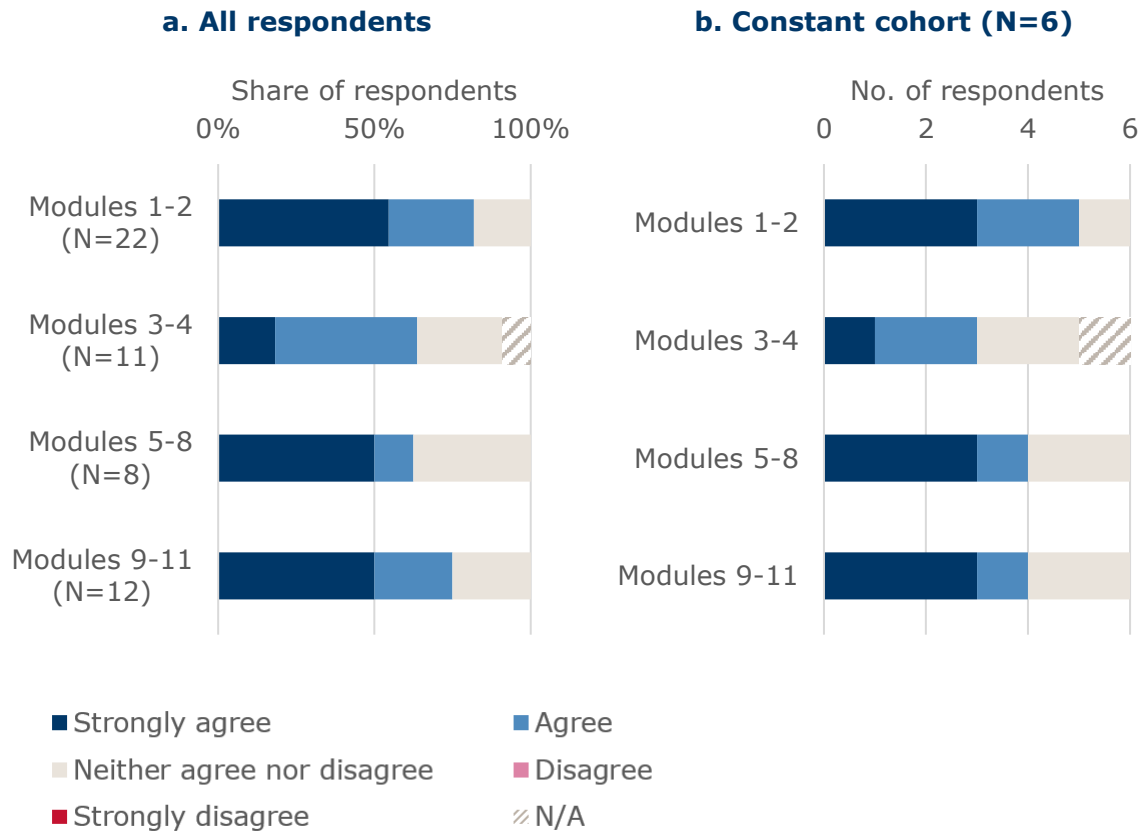
Figure 16: 'I can see how I will use what I've learnt in my job'



Source: Module feedback surveys.

Across all modules, most respondents strongly agreed, or agreed, that they were likely to introduce a new, or change an existing, process or procedure because of participating in the Pilot. Figure 17 indicated that modules 3-4 were the least likely ones to lead to new or changed processes and procedures.

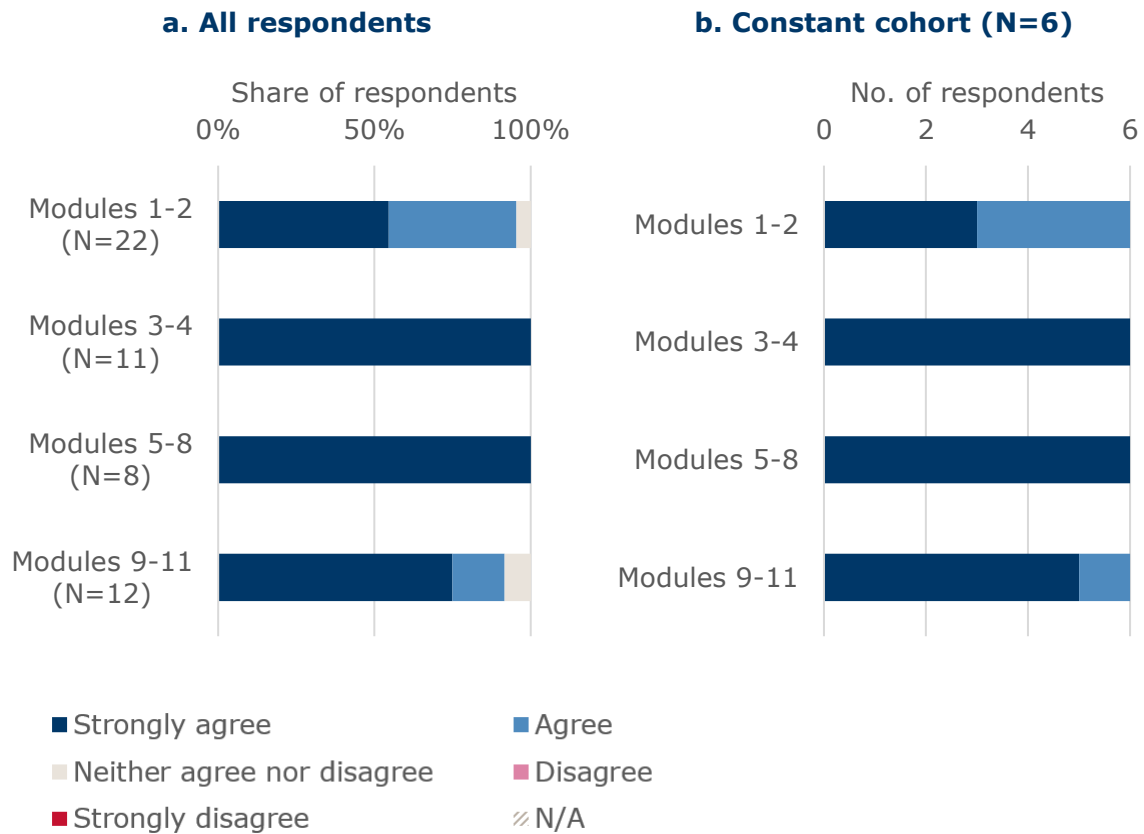
Figure 17: 'I will likely introduce a new or change an existing process / procedure because of the training'



Source: Module feedback surveys.

Finally, Figure 18 shows that almost all respondents would recommend the modules to their peers, which is very positive feedback. In particular, all respondents would strongly recommend modules 3-8. The reason behind more lukewarm praise for the other modules is likely to be early difficulties with clarity and navigation for modules 1-2, and less widespread relevance for modules 9-11.

Figure 18: 'I would recommend these e-learning modules to other SME owners'



Source: Module feedback surveys.

Annex C: Final feedback survey

This Annex presents the analysis of the final feedback survey responses. The survey was distributed either upon completion of module 11, or on 1 December 2022 for participants who had not completed all 11 modules by 30 November 2022. The survey sent out to participants differed depending on the number of modules that participants had completed. The survey closed on 16 December 2022, having collected a total of 27 responses out of a population of 52. Of these, 16 were businesses, 10 were not-for-profit organisations, and one was unclear.

C.1. Profile of respondents

Table 5 shows that, of the 27 respondents, 12 had completed all modules by 30 November 2022. Of those that hadn't completed all modules on the Pilot, one respondent could not be matched to their profile meaning it was not possible to establish exactly how many modules they took.⁹

Table 5: Module progression of final survey respondents

Last module completed	No.	% of all surveys
Module 1	2	7%
Module 2	2	7%
Module 3	3	11%
Module 4	2	7%
Module 5	1	4%
Module 8	1	4%
Module 9	1	4%
Module 10	2	7%
Module 11	12	44%
Not identifiable	1	4%
Total	27	100%

Source: Final feedback survey.

Larger-sized organisations were more likely to have completed more modules. There were no discernible differences between businesses and not-for-profit organisations in terms of their likelihood to progress further into the Pilot.

Prior to the Pilot, participants spent varying amounts of **time building their knowledge of and keeping up to date with data protection issues**. The time spent on this ranged from a few spending minimal or no

⁹ As they were administered the survey designed for respondents who had not completed the Pilot, we can assume they had completed less than 11 modules.

time at all, to some organisations where one person would spend a few hours each year getting updated and upskilled while other colleagues would spend around an hour refreshing their knowledge.

The staff time spent **dealing with data protection related issues** prior to participating in the Pilot also varied greatly among participants, ranging from no time at all to two FTEs¹⁰. Three participants mentioned spending time on Data Protection Impact Assessments (DPIAs), and a further two mentioned dealing with minor breaches.

Seven respondents said they had **bought external advice or assistance**. Of these, three had attended external training, and one had occasionally used expert data protection (DP) counsel.

As shown in Table 6, most respondents used the ICO as a source of advice and learning material on data protection before signing up for the Pilot.

Table 6: Sources of advice / learning material on data protection used before the Pilot

	All respondents (N=27)	
	No.	% of all respondents
The ICO	22	81%
Private company	5	19%
Other materials available on the web (eg search engine results, video streaming sites etc)	4	15%
International public sector data protection agencies (eg the European Data Protection Board, EDPB)	3	11%
Internal training materials only	3	11%
Another UK public body	1	4%
Did not use any materials or seek advice	2	7%

Source: Final feedback survey.

C.2. Experience with the Pilot

When asked about **motivations for signing-up** to the Pilot, almost all respondents indicated they wanted to improve their overall data protection knowledge, as seen in Table 7 below. Other common reasons were to learn how to apply data protection in specific circumstances, and to take advantage of a development opportunity. This indicates most respondents have an interest in learning about data protection.

¹⁰ Full Time Equivalent staff members

Furthermore, almost two thirds of respondents signed up for the Pilot because they wanted to support the development of ICO resources, showing strong engagement with data protection and an appreciation for the ICO’s objectives and activities. One respondent said that they were looking to “understand how the data essentials modules could be used by our 1400+ registered [members] to help them to increase their data protection knowledge”.

Table 7: What motivated respondents to sign up

	All respondents (N=27)	
	No.	% of all respondents
I wanted to improve my overall data protection knowledge	26	96%
I wanted to support the development of ICO resources	17	63%
I wanted to learn how to apply data protection in specific circumstances	16	59%
A personal or professional development opportunity	15	56%
I wanted to signal to my customers that I take data protection seriously	10	37%
I wanted to get ahead of my competitors	0	0%

Source: Final feedback survey.

For the 15 respondents who completed some but not all of the modules, timing conflict was the most common blocker, as seen in Table 8. The 8 respondents who could not complete the Pilot because of lack of time, tended to be smaller in size (smaller than both the average size for all 27 respondents, and the average size for the 15 who completed some but not all modules). This indicates that finding the time to participate was a particular challenge for smaller organisations. Small staff numbers often do not allow these organisations the flexibility that a larger organisation might have, especially in the face of unforeseen circumstances. One respondent said that they did not finish the Pilot because the final module was not applicable to their work.

Table 8: What prevented respondents from completing all modules

	Respondents who did not complete all modules (N=15)	
	No.	% of all respondents
Timing conflict	8	53%
Staff resource	3	20%
No longer interested or needed	1	7%
Did not meet my expectations	1	7%

Source: Final feedback survey.

One respondent highlighted that their non-completion of modules was linked to the fact that the Pilot did not meet their expectations (Table 8), and from Table 9 we can see that this was the only person whose expectations were not met. They explained that the Pilot “was so in-depth and complex - for what I do, it was far more that (sic) I needed to know”. This person, it should be noted, only completed one module. Overall, the Pilot met the expectations of the vast majority of respondents, which is very positive.

Table 9: Did the Pilot meet the respondents' expectations

	All respondents	
	No.	% of all respondents
Definitely	12	44%
To a large extent	13	48%
To a small extent	1	4%
It did not	1	4%
Total	27	100%

Source: Final feedback survey.

Respondents stated that this was driven by their satisfaction with the level of detail and the clarity of the content. Many also reported that the modules were engaging and the content useful, even when not all of it was directly relevant to them.

Whilst most comments were positive, a few highlighted some areas for reflection. First, some respondents did not find all topics to be relevant to their business or geared to a small organisation. Second, a respondent highlighted that the Pilot “was lengthier and much more intensive in knowledge than I anticipated”, which made the time commitment required greater than anticipated.

The one respondent who said that the Pilot did not meet their expectations is the only participant who would not recommend it. Of the other respondents, 25 participants would recommend this or a similar programme to other SME owners, and one is unsure.

Table 10 summarises the respondents’ suggestions on how to promote the Pilot to the wider SME population. The most common suggestion was to promote the Pilot through trade bodies, membership organisations, and similar.

Table 10: Respondents' suggestions on how to promote the Pilot

Suggestions
Use organisations that support SMEs, industry collectives, membership organisations, trade bodies, regulatory bodies, etc.
Free training with certification
Promoted when reminding SMEs about their DP fee
"Lead them in gently with a tailored approach appropriate to the scale and risks of their enterprise"
Promote on LinkedIn
More prominence on website, blog
"Engage with insurance companies to see if they can add it to their requirements for insuring SME's for both Cyber and other liability insurance as it will help to mitigate risk"
Include a starter pack with all the templates SMEs need to ensure they are compliant
"Perhaps offer the ICO registration fee at a reduced rate if they take the programme?"

Source: Final feedback survey.

C.3. Outcomes of the Pilot

All but one respondent said that they felt more confident in dealing with data protection issues since starting the Pilot. Table 11 shows that the majority of respondents were 'somewhat' rather than 'a lot more confident', suggesting that some uncertainty might remain even after taking part in the Pilot. The more modules respondents completed, the more likely they were to feel more confident.

Table 11: How confident respondents feel in dealing with data protection issues since starting the Pilot

	All respondents	
	No.	% of all respondents
A lot more confident	8	30%
Somewhat more confident	18	67%
As confident as before	1	4%
Somewhat less confident	0	0%
A lot less confident	0	0%
Total	27	100%

Source: Final feedback survey.

For the majority of respondents, their knowledge of data protection had increased since starting the Pilot, as shown in Table 12. Furthermore, the more modules respondents completed, the more likely they were to say that their knowledge had increased substantially.

Table 12: Respondents' knowledge of data protection now compared to before starting the Pilot

	All respondents
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	No.	% of all respondents
Much higher	4	15%
Higher	19	70%
The same	3	11%
Lower	1	4%
Much lower	0	0%
Total	27	100%

Source: Final feedback survey.

Respondents who completed all modules were asked how informed they felt about data protection issues, and Table 13 shows that over 80% of respondents feel somewhat or a lot more informed after completing the Pilot. The one respondent who felt 'as informed as before' said that their knowledge had not changed but, at the same time, they felt more confident about it.

Table 13: How informed respondents feel about data protection issues since starting the SME Data Essentials Pilot

	Respondents who completed all modules	
	No.	% of all respondents
A lot more informed	5	42%
Somewhat more informed	5	42%
As informed as before	1	8%
Somewhat less informed	0	0%
A lot less informed	0	0%
N/A	1	8%
Total	12	100%

Source: Final feedback survey.

Twenty respondents said they would be **making changes after participating** in the Pilot. Six of these have already started making changes and the remaining 14 plan to make changes soon. This is a positive result with almost 75% of respondents making or planning to make changes to their data protection policies, practices, and processes.

Table 14: Respondents' plans for changes to processes and procedures since starting the Pilot

	All respondents	
	No.	% of all respondents
I have already started making changes	6	22%
I plan to make changes soon	14	52%
I have no immediate plans but will revisit in the future	5	19%
I do not plan on making any changes	0	0%
Unsure	2	7%

Source: Final feedback survey.

One of the respondents with no immediate plans said that this was because the data protection practices in place were compliant already and do not need any changes, whilst the others did not give an explanation.

Respondents often said they'd be reviewing existing procedures and policies, and making changes where appropriate. These changes include:

- documented procedures for handling requests and incidents;
- retention policy;
- simplified DPIA process;
- stronger risk assessment;
- policy on how to handle Disclosure and Barring Service (DBS) information;
- new template for breaches log;
- new log of software providers; and
- changes to lawful bases.

Many respondents also indicated they'd be making adjustments or expansions to staff training. One membership organisation said they'd be publicising data rights to their members.

Respondents who took more modules were more likely to say that their knowledge had increased substantially, and that they were feeling more confident. More confident respondents, the data shows, were more likely to have already started making changes or planned to make changes soon. This indicates that the Pilot has empowered participants with knowledge and confidence allowing them to improve their data protection processes, regardless of their size and their sector.

When asked what benefits they expected from the changes, half of respondents who have made, or were planning to make, changes said they did not foresee any of the benefits listed in Table 15. They reported that they were making changes just because it was "the right thing to do". This was particularly the case for businesses. The fact that only four out of the 11 businesses who have made or were planning to make changes were likely to expect direct benefits from these changes strongly suggests that often businesses see data protection solely as a duty. Just

two businesses thought their changes would lead to increased customer confidence.

Table 15: Expected benefits of changes

	Respondents who have made or were planning to make changes (N=20)	
	No.	% of all respondents
Reduced potential for regulatory action	6	30%
Reduced potential for customer complaints	5	25%
Increase in customer confidence	3	15%
Increase in customer base	0	0%

Source: Final feedback survey.

Only one of the respondents said that they expected the changes to take less than an hour. Most changes were expected to require a substantial time investment, with half of changes expected to take more than 10 hours. A breakdown of responses is shown below in Table 16.

Table 16: How many hours the changes are expected to take

	Respondents who have made or were planning to make changes	
	No.	% of all respondents
Less than an hour	1	5%
1-9 hours	8	40%
10-19 hours	5	25%
More than 20 hours	5	25%
N/A	1	5%
Total	20	100%

Source: Final feedback survey.

Most often, these changes would only incur a cost in terms of time spent (and related wages). Only one respondent highlighted they were likely to outsource some aspects of the changes, and another might incur costs from their booking software if they need to update their mailing template or make other similar adjustments.

About two thirds of respondents said they were completely or to a large extent making changes due to participating in the Pilot. This is a very positive result, indicating that these **changes would not have happened or would have happened much later were it not for the Pilot**. Table 17 also shows that no respondent said that the changes were not attributable to the Pilot at all, reinforcing the positive impact of the Pilot. Finally, it is worth noting that all businesses said their changes were

completely, or to a large extent, attributable to the Pilot, which highlights the positive economic impact of the Pilot.

Table 17: To what extent the changes are due to participating in the Pilot

	Respondents who have made or were planning to make changes	
	No.	% of all respondents
Completely	7	35%
To a large extent	6	30%
To a moderate extent	4	20%
To a small extent	2	10%
They were not due to the Pilot at all / we would have made the changes anyway	0	0%
N/A	1	5%
Total	20	100%

Source: Final feedback survey.

C.4. Appetite for recognition

Thirteen respondents said that they planned on communicating to others that they took part in the Pilot, while 14 said they did not, splitting the respondents roughly in half on this matter. Businesses were more likely to say they would not, and not-for-profit were more likely to say they would.

Respondents who said yes, were **planning to communicate their participation** to their board and the rest of their staff, as well as their peers. One respondent said they'd be putting their participation on their CV/profile. Across all respondents, and without any prompt, two mentioned it would be useful to have a badge or certificate of completion when communicating participation to others.

Respondents were then asked how much they would benefit from a badge and a public register. The results are presented in Table 18 below. More respondents said they would benefit substantially from a badge compared to a public register (59% and 41%), and this preference remains even when looking at businesses alone (69% and 50%). Twenty-three respondents would benefit to some extent from a combination of badge and public register, four respondents would benefit from a badge alone, and no respondent indicated they would benefit from only the public register.

Table 18: To what extent would respondents benefit from obtaining the following from completing this or a similar programme

	A badge or similar accreditation	A public register
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	No.	% of all respondents	No.	% of all respondents
A lot	16	59%	11	41%
A little	11	41%	12	44%
Not at all	0	0%	3	11%
N/A	0	0%	1	4%
Total	27	100%	27	100%

Source: Final feedback survey.

The respondents who prefer the combination of badge and public register indicated that it would mostly benefit their organisation or both themselves and their organisation. The three respondents who prefer the badge only, all said it would benefit both. More detail can be found in Table 19.

Table 19: Who would benefit from badge and public register

	Badge and public register		Badge only	
	No.	% of all respondents	No.	% of all respondents
Myself	2	8.7%	0	0%
My organisation	10	43.5%	0	0%
Both	8	34.8%	3	100%
Unsure	2	8.7%	0	0%
N/A	1	4.3%	0	0%
Total	23	100%	3	100%

Source: Final feedback survey.

Asked how the benefits would materialise, respondents often said it would help customers feel more confident. In the words of one respondent, the benefits are: "For the organisation, more confidence in using the organisation by clients/procurement. For the individual, badging encourages others to gain the badge and looks good on profiles/CVs for employers". Another respondent said the badge and the public register would be a "tangible proof of good practice".

The majority of respondents believed a badge would be useful for SMEs upon completion of this or a similar programme. One respondent added that, on top of the already mentioned badge and public register, SMEs could benefit from having a way to validate completion on LinkedIn, as well as a certificate of attendance to be shared with their employer. Another respondent suggested "an optional 'adopter' badge for the organisation, showing that the course is in use", though they recognise this would show engagement but not guarantee approval. One respondent added that some form of output may be more important for organisations holding high risk or special category data.

C.5. Data protection going forward

Respondents most commonly expected the time spent building knowledge of, and keeping up to date with, data protection issues to increase after the Pilot. This can be linked to respondents spending time making changes, as discussed in relation to Table 16, and to participants introducing further training for staff. One respondent explicitly said they expected the time spent to initially increase but “once reviews have taken place and systems [are] set up, then time will be less”. Two other respondents said they expected a more efficient use of time.

Table 20: Change in time spent building knowledge of, and keeping up to date with, data protection issues (annual)

	All respondents	
	No.	% of all respondents
Increase	11	41%
Initial increase	1	4%
Initial increase, then decrease	1	4%
Decrease	2	7%
Unchanged	2	7%
N/A	10	37%
Total	27	100%

Source: Final feedback survey.

Table 21 below shows how respondents expected the time spent dealing with data protection issues to change after participating in the Pilot. Respondents who expected the time to increase after participating in the Pilot, stated that this was driven by factors similar to those outlined above (training and time making changes to processes). Respondents who expected the time to decrease or stay the same, stated that it was driven by a reduction in the time expected to be spent dealing with data breaches or subject access requests.

Table 21: Change in time spent dealing with data protection issues (annual)

	All respondents	
	No.	% of all respondents
Increase	8	30%
Initial increase, then decrease	1	4%
Decrease	4	15%
Unchanged	5	19%
Too soon to tell	1	4%
N/A	8	30%

Total	27	100%
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Source: Final feedback survey.

Prior to participating in the Pilot the majority of respondents were not buying in external advice or assistance, and Table 22 shows that many of them do not expect this to change. A considerable number of respondents (22%), however, are planning or considering the need to start doing so. This was often because the Pilot had made them increasingly aware of their responsibilities. In the words of a respondent, "I will make my own best efforts, but recognise for certain procedural and legal protections, I need to engage professional assistance as a sole owner SME".

Of the seven respondents who said they were buying in external advice or assistance prior to the Pilot, four said that after the Pilot they would be buying less. This indicates that the Pilot had reduced their need for external expertise. This provides a good indicator of how the Pilot, or a similar initiative, can reduce the cost of compliance for organisations. Two out of seven said they would likely continue as before, and the last one did not provide an answer.

Table 22: Change in buying in external advice or assistance (annually)

	All respondents	
	No.	% of all respondents
Continue not buying	9	33%
May or will start buying	6	22%
Buy less	4	15%
Continue buying as before	2	7%
Unsure	2	4%
N/A	4	15%
Total	27	100%

Source: Final feedback survey.

The majority of respondents said they would continue accessing the advice and learning materials they had used in the past, as seen in Table 23. A large number of respondents said they would access more free advice and materials, showing a growing engagement with data protection issues. Encouraging further learning in participants is certainly a positive outcome of the Pilot. Only a small minority said they'd be accessing more paid advice and materials, and nobody said they'd access advice and materials less.

Table 23: Sources of advice / learning material on data protection after the Pilot

	All respondents (N=27)
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	No.	% of all respondents
Continue accessing the advice and/or learning materials I have used in the past	20	74%
Access more free advice and/or learning materials	14	52%
Access more paid advice and/or learning materials	3	11%
Access less advice and/or learning materials	0	0%
Don't know / unsure	5	19%

Source: Final feedback survey.

Table 24 shows that two thirds of respondents said they would be visiting the ICO website more often compared to before the Pilot, showing that the Pilot both encouraged respondents to stay up to date with data protection and it had a positive reputational effect for the ICO.

Table 24: How often respondents will visit the ICO website compared to before the Pilot

	All respondents	
	No.	% of all respondents
More often	18	67%
As often	9	33%
Less often	0	0%
Total	27	100%

Source: Final feedback survey.

Table 25 reinforces the finding that the Pilot had a positive reputational effect for the ICO. The majority of respondents (85%) were more likely to engage with the ICO and its support after participating in the Pilot.

Table 25: Respondents' likelihood of engaging with the ICO and its support in the future

	All respondents	
	No.	% of all respondents
A lot more likely	10	37%
Somewhat more likely	13	48%
As likely as before	4	15%
Somewhat less likely	0	0%
A lot less likely	0	0%
Total	27	100%

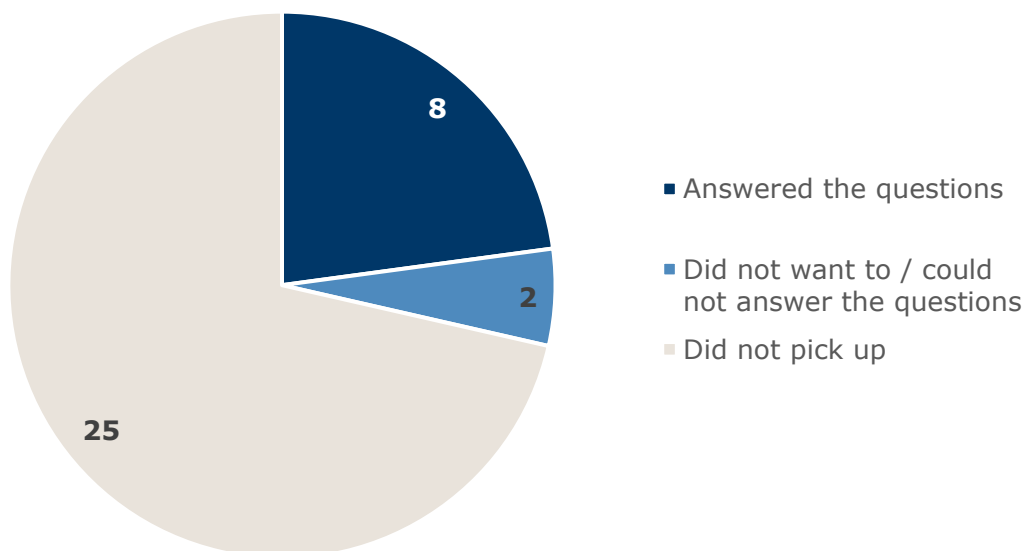
Source: Final feedback survey.

Annex D: Feedback from non-participants

This section focuses on the 35 organisations who either had been shortlisted for the Pilot after expressing an interest and did not activate their account, or had activated their account but did not complete any modules.

To help understand why some organisations didn't progress their participation, we conducted a series of short telephone interviews. The purpose of these telephone interviews was to enquire about motivations for expressing interest in the Pilot and then subsequently not engaging with the modules. As shown in Figure 19, eight of the 35 organisations engaged with this request for feedback. The relatively small sample size should be borne in mind when reviewing the analysis that follows.

Figure 19: Outcome of telephone engagement



Source: ICO's Economic Analysis team call records.

The most common reason cited for expressing interest was to improve overall data protection knowledge, followed by taking advantage of the development opportunity. Table 26 shows that none of the respondents were motivated by the desire to get ahead of their competitors. Comparing the answers in Table 26 to how final survey respondents answered the same question (Table 7), there were no remarkable differences - organisations who did not participate did not have a fundamentally different motivation for expressing interest in the Pilot.

Another reason cited by a respondent was that participation would be useful in advising the start-ups they support. One respondent could not recall why they expressed interest in the Pilot.

Table 26: What motivated non-participant respondents to express interest

Reason	Respondents (N=8)	
	No.	% of all respondents
I wanted to improve my overall data protection knowledge	4	50%
A personal or professional development opportunity	2	25%
I wanted to signal to my customers that I take data protection seriously	1	13%
I wanted to support the development of ICO resources	1	13%
I wanted to learn how to apply data protection in specific circumstances	0	0%
I wanted to get ahead of my competitors	0	0%
Other	2	25%

Source: ICO’s Economic Analysis team call records.

The most common reason for not participating was the lack of time, as reported in Table 27.

- One respondent in particular cited a change in their business as onerous for time and staff resources.
- Another respondent said they had been unable to participate because of health reasons.

This aligns with Table 8 in Annex C which reported difficulties with time commitments as a common challenge for participants. Changes in circumstances preventing respondents from having the time to participate are to be expected, especially for a Pilot over a relatively short timescale with smaller-sized organisations.

One respondent said they did not participate because they were not able to access the online portal.

Table 27: What prevented respondents from participating

Reason	Respondents (N=8)	
	No.	% of all respondents
Timing conflict	3	38%
Staff resource	2	25%
No longer interested or needed	0	0%
Did not meet my expectations	0	0%
Other	3	38%

Source: EA team call records.

Finally, four respondents said they would like to participate in the future, while one respondent said they are unlikely to participate in the future even if the support was less time intensive.