



DELIVERABLE: SURVEY METHODOLOGY AND QUESTIONNAIRE

Project Acronym: **SMEDATA**

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Work Package: **2**

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CO	Confidential, only for members of the consortium (including the Commission Services)	



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Abbreviations

CPDP	Commission for Personal Data Protection (Комисия за защита на личните данни)
APIS	APIS Europa
SAJUZ	The Union of Bulgarian Jurists (Съюз на юристите в България)
EY	Ernst & Young Law Partnership (Адвокатско съдружие Ърнст и Янг)
EWLA - BG	European Women Lawyers Association Bulgaria
GPDPIT	Garante per la Protezione dei Dati Personali
UNIROMA3	Università degli Studi Roma Tre
GDPR	General Data Protection Regulation
EU	European Union
EC	European Commission
REC	‘Rights, Equality, Citizenship’ programme
WP	Work Package(s)
SME	Small and medium-sized enterprises



1. Project resume

The SMEDATA project (“Project”) was developed by the Consortium members - CPDP, APIS, SAJUZ, EY, EWLA – BG, GPDPIT and UNIROMA3 (“Partners”) with the main objective to promote the preparation for the effective application of the General Data Protection Regulation (GDPR) through awareness, multiplying training and sustainable capacity building for SMEs and their associations, including their in-house legal practitioners. The Project aims at ensuring sector specific and sustainable knowledge and implementation of the GDPR through self-assessment and awareness tool and assisting the understanding and compliance with the GDPR.

Work package 2 “Awareness and training” envisages a survey (“the Survey”) to assess the training and awareness raising needs of both target groups – SMEs and legal professionals within SMEs (for the purpose of this document they will be also referred to as “participants” or “respondents” interchangeably). In this regard, the current need assessment methodology and specialised questionnaire are with a purpose of gathering information and understanding on the two target groups in terms of:

- ▶ To what extent, the representatives of the target groups are informed and aware of the new GDPR requirements and the way it impacts them;
- ▶ What are the specific areas of the GDPR and the new personal data protection framework that are of a particular interest to them.

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Specifically, the current survey methodology aims to guide the Partners by providing a smooth implementation of the activity leading to improvement of the number and accuracy of responses as well as achieving both high quality and standardisation of the questionnaire.

The Survey aims to reach a broad number of respondents. The expected total number of representatives of the target groups is 600.

The results of the Survey will be assessed and compiled into a Survey report that will serve as a basis for the development of training methodology and training materials for the target groups.



2. Survey objectives

The objectives of the Survey are to identify, gather, and assess the needs regarding the understanding and the application of the GDPR among the two target groups.

The Survey is initiated and approved by the Partners at application level in order to provide smooth implementation of the particular Work package. It will involve expertise from all Partners at an early stage in drafting of questions in order to get relevant input and establish consensus among the consortium.

To attain concurrently cost efficiency and a satisfactory level of volume and quality of responses, a proven e-solution available on the market will be used to collect the results of the Survey.

2.1. Structure of the Survey

The Survey is structured in order to acquire two typologies of information: qualitative and quantitative. The qualitative information concerns needs regarding the understanding and the application of the GDPR. The quantitative information should be the basis to build inconsistency indicators among participants' knowledge of the GDPR and willingness to participate in the trainings.

The Survey comprises mainly of two types of questions: closed and semi-structured questions directed to both target groups. Open-end questions will be limited.

The Survey will start with a proper introduction and questions:

- Introductory part - type of participants (SMEs or legal practitioners within SMEs), their sectors, geographical area/s of operations (EU / EEA and / or third countries), a corporate group;
- Questionnaire - level of knowledge of the participants regarding the GDPR;
- Glossary for the Survey: An explanation of terminology to assist survey participants will be made available by hovering over data elements underlined in black throughout the survey

(Jointly referred to as “the Survey forms”).

When participants raise any issues, they should be expanded through further prompting via telephone call or email exchange.



In the course of the development and implementation of the Survey forms, much information about the quality of the Questionnaire will be gathered from various perspectives (e.g. level and timeliness of responses, channels of distributions; speed and quality of respondents' feedback). A structural feedback procedure is planned to assess this information.

2.2. Feedback gathering

The Survey will be conducted in electronic format anonymously and confidentially. To avoid prejudice or improper use of survey data, adequate technical, organizational and regulatory steps will be undertaken to guarantee complete anonymity of the respondents. An express statement will be published on the partners' websites and included in the Introductory part of the Survey to the effect that its results will be used only for developing of training materials for SMEs and their internal legal practitioners.

The announcement will be carried out using the following communication channels: by e-mail, public announcements via Partners' websites and social media campaign (LinkedIn).

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The Project will be presented, including comments to the effect that:

- ▶ The Survey is being undertaken by the SMEDATA project partners and is funded by the European Union's Justice Programme (2014-2020) & Rights, Equality and Citizenship Programme (2014-2020)
- ▶ The content focuses on the respondents' views on the application of the GDPR.
- ▶ The filling in of Survey forms should last no longer than 20 minutes.

The publication of an announcement of the Survey on the partners' websites will be designed to direct the potential participants to the website of SMEDATA (<http://smedata.eu>). The Partners will decide on which of their websites to publish the announcement to achieve a satisfactory level of responses considering the popularity and quick and easy access to those websites.



3. Rules and criteria to identify participants in the survey

A number of 600 representatives of both target groups are aimed to be reached within the Survey.

It is important to remember that the aim of the assessment is to survey key stakeholders in relation to their views towards the needs for a GDPR awareness raising and training events among representatives of the target groups. The outcome expected is to identify key areas of interest, and the knowledge and skills needs of relevant target groups, thereby ensuring the appropriateness of the modules and sessions suggested for the training program.

The Survey sets the framework and common starting point for many of the capacity building activities, as it will evaluate the requirements of the target groups and will define, based on existing knowledge and skills, the appropriate trainees' profiles and the required further training content.

Therefore, to select SMEs, the Partners will follow the definition of European Commission in regards to SMEs defined in the EU recommendation 2003/361, as follows:

"The category of micro, small and medium-sized enterprises (SMEs) is made up of enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding 50 million euro, and/or an annual balance sheet total not exceeding 43 million euro."

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In this regard, the expected participants are limited to:

- ▶ SMEs
- ▶ Legal professionals at a SME

4. Survey design

The Survey design will be simple, clear and well-structured. It will contain three levels of information:

- ▶ First level: Information on the Project, including the objectives of the Survey;
- ▶ Second level: General information on participants;
- ▶ Third level: Questions on specific issues related to data processing in the light of the GDPR (the Questionnaire).



The questions in the Questionnaire will be organized in two subsections: (i) Subsection 1 “General Overview of Data Protection under the GDPR” and (ii) Subsection 2 “Roles and responsibilities under the GDPR”.

The questions in Subsection 1 will be tailored towards obtaining information on the participants’ awareness and understanding of the general concepts, principles and requirements of the GDPR. The questions will be focused on the following themes:

- ▶ Categories of personal data;
- ▶ Legal grounds for processing of personal data;
- ▶ Purpose of processing;
- ▶ Retention periods.

The questions in Subsection 2 will be tailored towards obtaining information on the participants’ awareness and understating of their role, obligations and tasks related to personal data processing. The questions will be focused on the following themes:

- ▶ Information obligations;
- ▶ Technical and organizational measures;
- ▶ Data breach notification;
- ▶ Records of processing activities;
- ▶ Areas or topics in respect to which the participants identify a need to build deeper awareness or knowledge.

5. Methodology for Survey results evaluation

The e-solution applied to collect the Survey feedback will allow to examine each anonymous individual participant’s responses, as well as to generate summarized responses per question. Based thereon, the Survey feedback will indicate the main findings on the participants’ awareness, preparedness and needs to comply with the GDPR.

5.1. Quality of Survey feedback

To achieve satisfactory quality of the Survey feedback, a two-fold approach will be applied. At the first level, the e-solution should ensure that only fully completed Survey forms will qualify. At the



second level, the Introductory part will contain control questions which will be a ground to disqualify certain participants based on objective criteria. Such criteria will include: whether the participant is an SME or a legal professional within a SME, supplemented by an additional question asking whether the respondent is a part of a corporate group.

5.2. Evaluation of Survey feedback

The responses to questions in the Introductory part will not be used to evaluate the participants' awareness, preparedness and needs. Only the answers to the Questionnaire will be used for the stated objectives of the Survey.

Each response to the Questionnaire is weighted equally.

The evaluation of the Survey feedback will be presented in a comprehensive fashion in the Survey report.

6. Data processing

The data collected will be used only for the purposes of the SMEDATA project, in particular for the Survey report. Based on the results, the Partners will elaborate a package of training materials and training methodology to implement awareness and training events as well as training the trainers module.

The invited participants will take part voluntary and may choose not to participate. If the invited participants decide to participate in this Survey, they may withdraw at any time.

All responses are anonymous. None of the responses will be connected to identifying information.

All responses will be kept confidential. They will only be used for statistical purposes.



7. Road map and time plan

For the next 4 months the Partners will:

- ▶ Establish a working group to conduct the Survey, including:
 - Elaborate a web-based questionnaire;
 - Identify participants;
 - Distribute the questionnaire among the target group;
 - Evaluate the results of the Survey;
 - Conduct a rough planning of the following actions based on the results.

- ▶ Create a Survey report
 - Analyze the results of the survey;
 - Create training methodology.

#	Activities & Tasks	2019															
		2				3				4				5			
		Jan				Feb				Mar				Apr			
		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
1	Establish a working group to conduct the survey																
1.1.	Elaborate a web-questionnaire																
1.2.	Identify participants																
1.3	Distribute the questionnaire among the target group																
1.4	Review results of the survey																
1.5	Conduct a rough planning of the following actions																
2	Create a Survey report																
2.1.	Analyze the results of the survey																
2.2.	Create training methodology																
Legend:																	
	Project month																
	Duration of activity																
	Duration of task																

