

Data protection in practice

A study of data protection in organisations
required to have a data protection officer

IMY report 2023:1



Summary

Data protection in practice is largely carried out by the data protection officers found throughout the country. These data protection officers (DPO) need sufficient time to fulfil their assignment, something that, according to our survey, many still lack. It is also concerning that less than half of the DPO believe that their own organisation works continually and systematically with data protection.

Sufficient time and the right resources important for the assignment

It is important that data protection officers receive both sufficient and appropriate resources to allow them to fulfil their assignment within their organisations. For example, DPO must have enough time for their tasks and have access to necessary information. DPO also need to maintain their expertise, such as through skills development.

Some important findings:

- A quarter of all DPO lack specific time allocated for data protection.
- Half feel that the allocated time for data protection is sufficient.
- Seven in 10 feel they receive sufficient training and skills development in their role.

Effective data protection requires good organisation

Systematic and continual privacy and data protection require both knowledge of GDPR and interest among the organisation's management in privacy and data protection. For this reason, it is concerning that less than half of DPO responded that their own organisation works continually and systematically with data protection.

Some important findings:

- Four of 10 feel that their own organisation works continually and systematic with data protection issues.
- Half can convince management and personal data controllers of the importance of personal data issues.
- Half feel that they are not included well in advance.
- Full-time DPO feel the assignment is more clear than those working part-time in the role.

The biggest challenges: Create practical procedures and coordinate the data protection rules with the organisation

Data protection in practice seems to have entered a new phase compared with 2019. There seems to be a clear decrease in the initial difficulties in understanding and implementing GDPR – at least in the organisations included in the survey. Instead, DPO argue that a big challenge is now that the regulations are seen as an obstacle to the organisation and that GDPR makes the work of the organisation more difficult.

Some important findings:

- The two biggest challenges are achieving functioning procedures and processes and ensuring the data protection rules do not inhibit or obstruct the organisation.
- More and more data protection officers feel that the biggest problem is a lack of commitment and knowledge by management.
- Fewer and fewer DPO see the interpretation of the regulations as a major challenge.

Key observations

DPO in nearly 800 organisations have responded to IMY's online survey. The following are some key observations based on these responses:

-
- Data protection work is a dynamic issue that requires persistence. It is now necessary to maintain and further develop the progress made after GDPR's initial enactment. It remains important to continually include the DPO in matters relating to privacy and protection of personal data within an organisation.
 - Active management, which sets the necessary priorities for security efforts, is required to take protection of personal data to the next level. The DPO should work closely with other relevant roles working with information management and security issues in the organisation, such as IT security, information security and cyber security. The DPO should also be included in matters relating to organisational development.
 - Work on organisational security measures needs to continue. For example, organisations need to introduce guidelines and routines for security work. IMY's follow-ups in recent years have shown that human error is behind a large proportion of data breach notifications to the authority. As such, training is a key factor in allowing employees to contribute to ensuring security within organisations.
 - The role of DPO needs to be clarified. Part-time DPO can experience the assignment as unclear.

Table of Contents

Summary	1
Key observations	3
Introduction.....	5

Chapter 1. Half of data protection officers have enough time to work effectively with data protection

A quarter lack specific time allocated for data protection issues	8
More data protection officers work part-time with data protection issues compared with 2019	9
Many work more than the time allocated for data protection issues	10
Half think they have enough time for data protection issues.....	11
Seven in 10 receive sufficient training and skills development	12

Chapter 2. Less than half feel that data protection work is systematic

Barely 4 in 10 believe that their own organisation works continually and systematically with data protection.	14
Almost half feel that they are not included in a timely manner	15
Half are able to convince management of the importance of data protection issues ...	16
Full-time data protection officers perceive the assignment as clearer.....	17
Fewer are included in decisions related to data protection than in 2019	18
Fewer can receive necessary support and help than in 2019.....	19
Most common to report to management.....	20
Fragmented picture	21
Half state that guidelines and procedures are followed to a large extent.....	23

Chapter 3. The biggest challenges: Create practical procedures and integrate the data protection rules with the organisation

The biggest challenges	25
------------------------------	----

Annex

Method and limitations.....	27
Additional figures and comparisons with 2019	30

Introduction

Welcome to IMY's study of the practical implementation of data protection work. One of our missions is to follow, analyse and describe what affects the protection of personal data. With this survey, we want to contribute facts and insights on how data protection officers experience their situation and their conditions for conducting data protection work within their own organisation four years after the General Data Protection Regulation (GDPR) was introduced in Sweden. The study also paints a picture of how far different organisations have come in their work with privacy and data protection.

In 2019, the Swedish Authority for Privacy Protection (IMY), which was then called the Data Inspection Authority, published the first survey of data protection work in practice in the report *Nationell integritetsrapport 2019* (National Privacy Report 2019). Our study follows up on some of that report's findings.

IMY's vision is a safe information society, where society's digitalisation takes place in a sustainable and privacy-friendly way.

Data protection officers ensure adherence to GDPR

GDPR was introduced in 2018. Since then, data protection officers (DPO) have had a central role in ensuring that the regulations are followed in practice in their organisation. This can involve collecting information about how personal data is processed, analysing and checking whether staff comply with the regulations on personal data processing, and making recommendations to personal data controllers or personal data processors.

While GDPR has strengthened the individual's basic rights when personal data is processed, the responsibility of the authorities, companies and other organisations that process personal data has also expanded. Organisations that process personal data must familiarise themselves with the regulations, adhere to them, and be able to point to what assessments have been made and what the organisation has done to

ensure secure processing of personal data and to improve protection of personal data in their own organisation.

All public authorities are required to appoint a DPO. Companies and other organisations whose core activity is to continually, systematically and extensively monitor individuals or process sensitive personal data or information about crimes must appoint a DPO.

It is part of IMY's mission to promote data protection in practice. With this study, we want to increase our understanding of the conditions DPO work under with data protection issues and find out how well privacy and data protection issues are integrated in public and private organisations. One reason we do this is to better be able to support DPO in their work.

Data protection officers from 800 organisations have participated

To answer our questions, in March 2022 we sent roughly 4,600 online surveys to organisations that had registered a DPO with IMY. DPO in 800 organisations, or just over 2 out of 10 organisations, responded to the online survey. This makes the participation rate relatively low, and the findings are therefore not representative of all organisations with DPO. Instead, the responses provide a picture of how the DPO in these 800 organisations experience the situation in their own organisations.

The questions dealt with

- if the DPO have sufficient resources to conduct effective data protection
- how to organise data protection effectively
- the biggest challenges at the moment for data protection in practice?

The relatively low participation by DPO in the online survey makes it difficult for us to draw conclusions when we compare the responses from this survey with the responses from the 2019 survey. For this reason, we are very cautious when drawing conclusions. The comparison primarily provides indications of short-term trends.

The report outline

Chapter 1 discusses whether DPO have sufficient resources to conduct data protection effectively. We examine such aspects as whether DPO feel that they have the right resources, whether the allocated work hours are sufficient and whether they receive sufficient skills development.

Chapter 2 discusses how to organise data protection work to make it effective. We investigate whether DPO think they have any influence, whether they receive support in their work and whether they feel that the organisation complies with its own guidelines and procedures.

Chapter 3 discusses the biggest challenges at the moment for data protection in practice. We compare the findings with the 2019 survey to identify significant changes over time.

Annex 1 describes the survey in more detail, and Annex 2 includes more detailed information with additional figures and comparisons with 2019.

Chapter 1.

Half of data protection officers have enough time to work effectively with data protection

Data protection in practice is largely carried out by the data protection officers (DPO) found throughout the country. It is important that DPO receive both sufficient and appropriate resources to allow them to fulfil their assignment within the organisation. For example, DPO must have enough time for their tasks and have access to necessary information. DPO also need to maintain their expertise, such as through skills development.

The findings in brief

- A quarter of all DPO lack specific time allocated for data protection issues.
- Half feel that the allocated time for data protection is sufficient.
- Seven in 10 feel they receive sufficient training and skills development in their role.

What does a data protection officer do?

Organisations that process personal data are required in certain cases to appoint a data protection officer. The data protection officer ensures that the organisation complies with GDPR by:

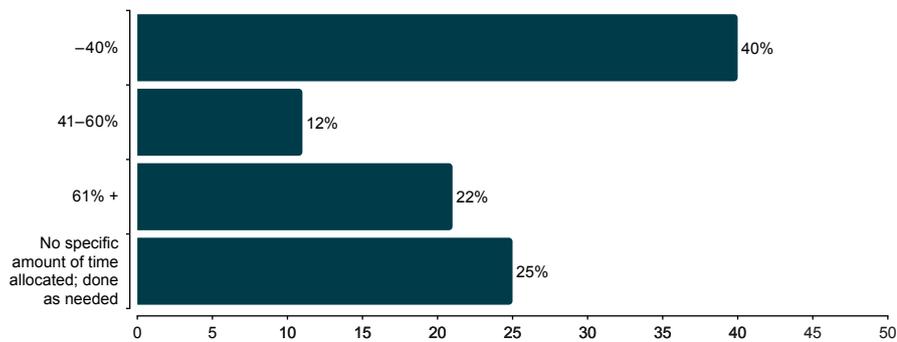
- inform and advise the controller
- monitor compliance with GDPR and other data protection regulations
- cooperate with the supervisory authority and act as the contact point at the organisation.

A quarter lack specific time allocated for data protection issues

Four out of 10 participating DPO have less than 40 per cent of their time devoted to data protection. A quarter lack specific time allocated for data protection issues. Instead, time is taken as needed. It is relatively unusual for DPO to devote most or all of their working time to data protection issues.

Figure 1

Approximately how much of your total work time is allocated to working with data protection?



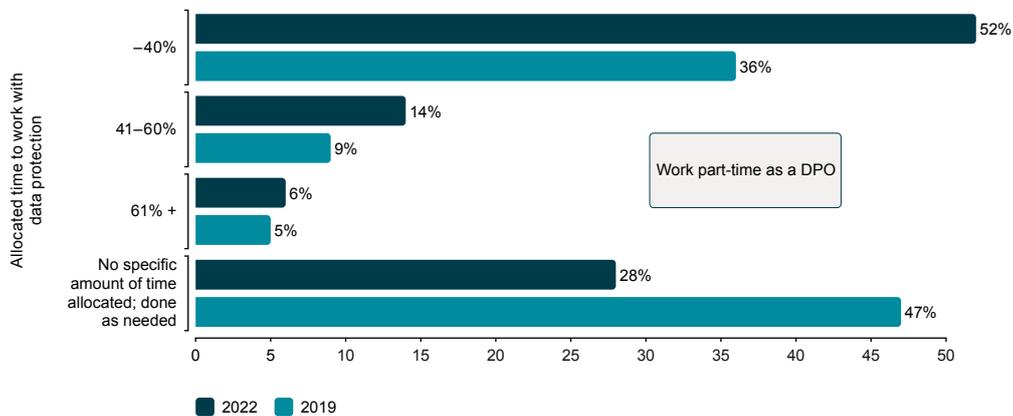
Source: Sifo. Base: All, 805 interviews.

More data protection officers work part-time with data protection issues compared with 2019

Half, 52 per cent, of those who work part-time as DPO state that less than 40 per cent of their time is devoted to work with data protection issues. Compared with 2019, significantly more part-time DPO have allocated time to work on these issues. At that time, significantly more respondents who worked part-time as DPO stated that they did not have specific time allocated for data protection issues. Instead, the work was done as needed. This change may be a sign that data protection work has become more formalised in the past three years.

Figure 2

Approximately how much of your total work time is allocated to working with data protection?

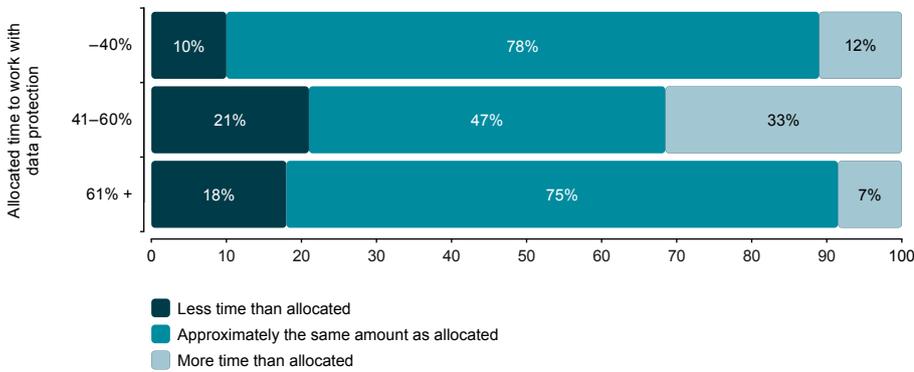


Source: Sifo. Base: Working part-time for comparison, 520 interviews (2022), 1,193 interviews (2019).

Many work more than the time allocated for data protection issues

Many DPO seem to work more than the time allocated for data protection issues. This is particularly true for DPO who have allocated 41–60 per cent of their working time for data protection issues.

Figure 3
Approximately how much of your total work time do you actually work with data protection?
Percentages calculated based on a 10 per cent interval for allocated time versus actual work time with data protection.

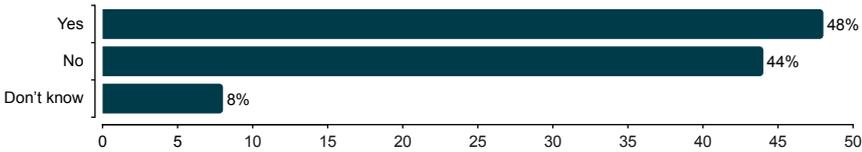


Source: Sifo. Base: Those who answered allocated work time 0–100%, 598 interviews, of which 318 interviews (0–40%), 100 interviews (41–60%), 180 interviews (61%+).

Half think they have enough time for data protection issues

Half of the DPO state that their allocated time for data protection issues is sufficient, 48 per cent. Almost as many state that the allotted time is not sufficient, 44 per cent.

Figure 4
Is enough time allocated for you to satisfactorily work with data protection?



Source: Sifo. Base: All, 805 interviews.

Comments

Another finding – which is not evident in the figure – is that a slightly larger proportion of DPO in private companies have enough time allocated for data protection issues, 54 per cent, than DPO in the public sector. It is also more common for DPO working full-time to feel that the allocated time for data protection is sufficient, 64 per cent, than DPO working part-time, 43 per cent.

It is positive that as many as half of DPO, especially in private companies and those who work full-time, felt they have enough time allocated. At the same time, almost as many think that they do not have enough time to work with data protection issues – at least not in a satisfactory way.

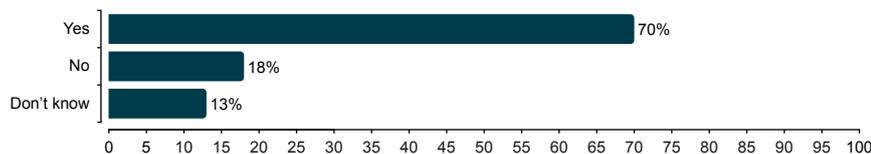
We believe that it is important that all DPO in the country be provided adequate conditions, including sufficient working hours, to be able to carry out their duties as DPO well.

Seven in 10 receive sufficient training and skills development

A majority of DPO feel they receive the training and skills development necessary to work with data protection in their organisation, 70 per cent. At the same time, one in five believes that they do not receive enough training and skills development in their role as data protection officer, 18 per cent.

Figure 5

Do you feel you receive the training and skills development necessary to work with data protection in the organisation?



Source: Sifo. Base: All, 805 interviews.

Comments

Data protection in practice is knowledge-intensive and places high demands on DPO and on their organisations. DPO need a good understanding of GDPR. In addition, they need to know their own organisation's operations, how the organisation processes personal data and how the organisation's information and IT security work. To succeed in establishing a data protection culture within their organisations, DPO need to receive training and skills development. This is crucial for data protection to work in practice.

We consider it positive that so many feel that they are receiving sufficient training and skills development for their role, but some organisations still need to do more.

Chapter 2.

Less than half feel that data protection work is systematic

Systematic and continual privacy and data protection require both knowledge of GDPR and commitment from the organisation's management. For this reason, it is concerning that less than half responded that their own organisation works continually and systematically with data protection.

The findings in brief

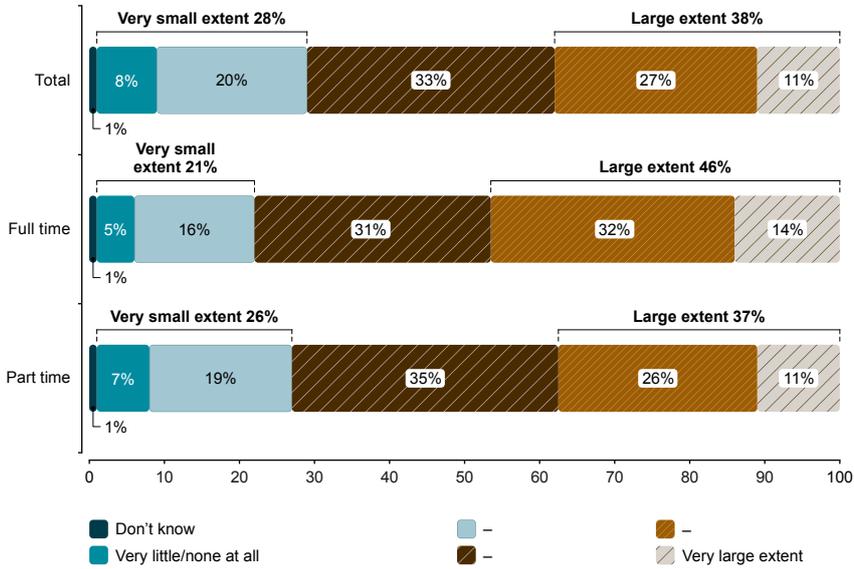
- Almost 4 in 10 believe that their own organisation works continually and systematically with data protection.
- Half feel they are able to convince management or personal data controllers of the importance of data protection issues.
- Half feel that they are not included in a timely manner.
- Full-time DPO perceive their assignment as clearer than those who work part-time in the role.

Barely 4 in 10 believe that their own organisation works continually and systematically with data protection.

Less than half responded that their own organisation to a large extent works continually and systematically with data protection, 38 per cent. Barely 3 in 10 report that data protection is only characterised to a limited extent or not at all by a systematic approach and continuity.

More full-time DPO believe that data protection is systematic and continual, 46 per cent. The corresponding figure for part-time DPO was 37 per cent.

Figure 6
To what extent does your organisation work regularly and systematically with data protection?



Source: Sifo. Base: All, 805 interviews, 189 (full time), 520 interviews (part time).

Comments

Systematic data protection involves working proactively and continuously with data protection in the organisation to strengthen the privacy of the individuals whose personal data is processed by the organisation.

By integrating data protection into the organisation's regular control, support and core processes, it becomes a natural part of development, change and improvement processes, along with other processes. This involves, for example, adapting organisational and technical measures based on the latest developments, the costs of implementation, the nature, scope, context and purpose of the processing, and the risks to the freedoms and rights of natural persons. The purpose is to ensure an appropriate level of security for personal data in relation to the risk to the freedoms and rights of individuals.

It is positive that almost 4 of 10 DPO report that their own organisation works systematically and continually with data protection to a large extent. At the same time, nearly 3 of 10 DPO in included organisations report the opposite: data protection in their own organisation is characterised only to a very small extent or not at all by a systematic approach and continuity four years after the introduction of GDPR.

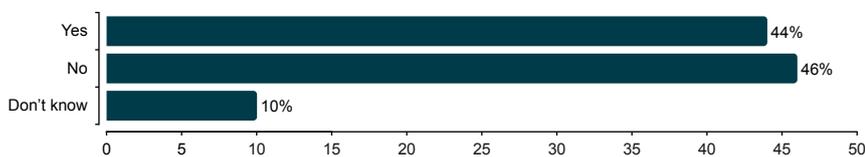
Almost half feel that they are not included in a timely manner

Nearly half do not feel they are included in a timely manner in projects where decisions impact data protection. A similar number feel that they are included in a timely manner.

It is most common for DPO to be included in innovation, development or change work that may impact personal data during the course of the work, 49 per cent. Only one tenth are included from the start. A fifth are included only in the final stage of the work. Sometimes DPO are not included at all or only after decisions have been made, as shown in Figure 8.

Figure 7

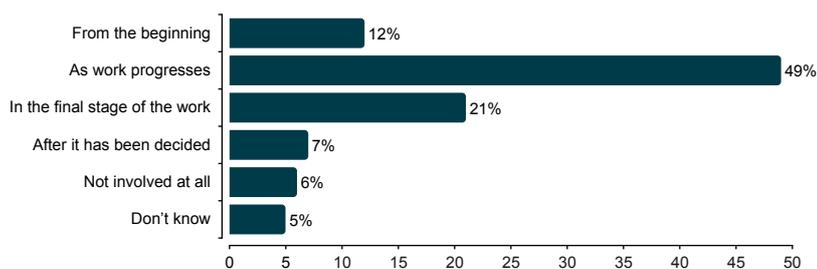
If you are included in this work, does this occur well in advance?



Source: Sifo. Base: Those that answer they are included to some extent in projects where decisions impact data protection, 757 interviews.

Figure 8

When are you generally included in innovation, development or change work that may impact personal data in your organisation?



Source: Sifo. Base: All, 805 interviews.

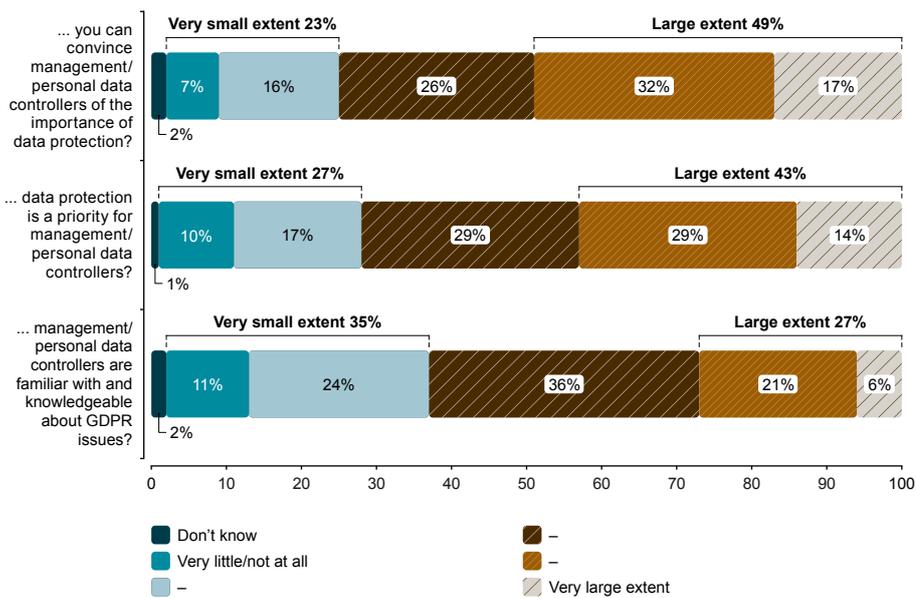
Comments

The results show that improvement is needed. DPO need to be included well in advance in data protection work, so that they can carry out the work in a continual and systematic manner. This applies not least to important processes and various development work that may affect the organisation's ability to protect the personal data processed by the organisation.

Half are able to convince management of the importance of data protection issues

Half of DPO feel it is relatively easy to convince management of the importance of data protection issues. Just over 4 of 10 think that management prioritises data protection issues. At the same time, only 1 in 4 feels that management is familiar with and knowledgeable about data protection issues.

Figure 9
To what extent do you feel that ...

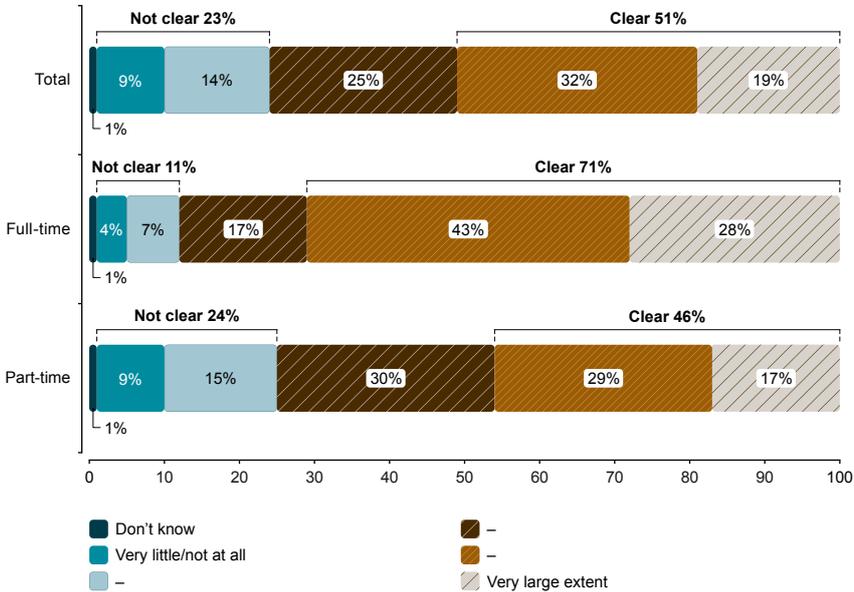


Source: Sifo. Base: All, 805 interviews.

Full-time data protection officers perceive the assignment as clearer

Half state that they think the assignment as a DPO is fairly or very clear in terms of what they have to achieve and deliver, 51 per cent. At the same time, almost one in four think that the mission is not clear, 23 per cent. It is more common for part-time DPO to consider that the assignment is unclear, 24 per cent, than full-time DPO, 11 per cent.

Figure 10
How clear is your assignment as data protection officer in terms of what you have to achieve and deliver?



Source: Sifo. Base: All, 805 interviews, 189 (full-time), 520 interviews (part-time).

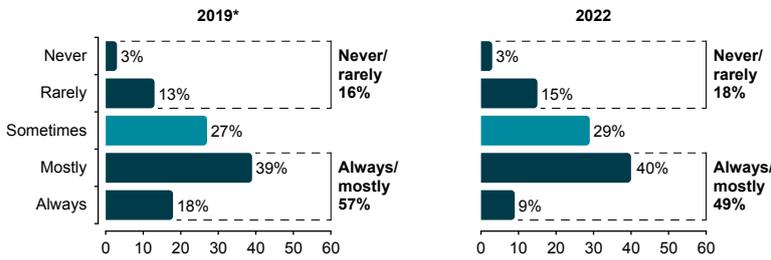
Comments

The findings indicate that data protection work conducted on a part-time basis is more often associated with an unclear assignment description. Part-time DPO do not know to the same extent what they are supposed to accomplish and deliver. Their work situation is more often characterised by unclear expectations.

Fewer are included in decisions related to data protection than in 2019

Fewer DPO in this year's survey believe that they are included in projects or decisions that affect data protection than in 2019. Half are often or always included in projects or other contexts where decisions are made that impact data protection, 49 per cent, while a fifth report that they are rarely or never included in projects, 18 per cent.

Figure 11
To what extent are you included in projects or other contexts where decisions impact data protection?



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).
 *NOTE: The alternative "Don't know" was not included in 2019; for 2022, 3% responded "Don't know".

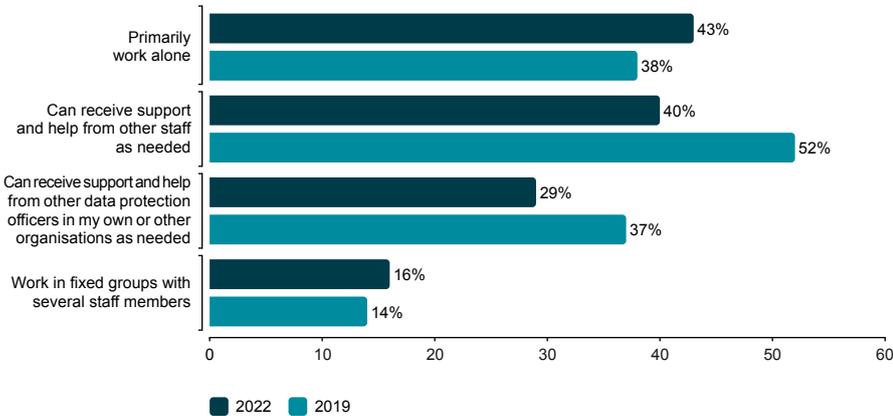
Comments

The findings for 2022 indicate that DPO in participating organisations are not yet regularly included when important decisions are made that impact the organisation's data protection work.

Fewer can receive necessary support and help than in 2019

Fewer DPO in this year's survey believe that they can receive support and help from others than in 2019. Nearly half state that they mainly work alone, 43 per cent. Almost as many believe that they can receive support and help from others as needed, 40 per cent. It is relatively unusual to work in fixed groups with several colleagues, 16 per cent.

Figure 12
Do you mainly work alone or can you receive support and help with data protection questions from other staff or other data protection officers at your workplace? *Multiple alternatives can be selected*



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).

Comments

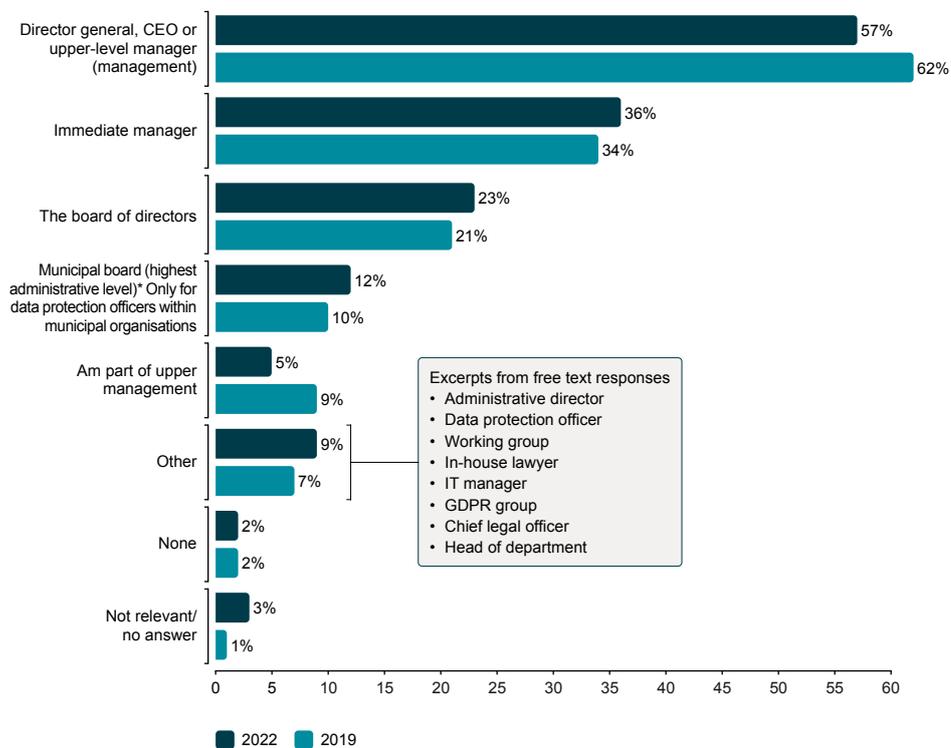
In the 2019 survey, DPO reported to a greater extent that they could receive support and help from others as needed. This may indicate that it has become more difficult for DPO to receive support and help and that work with data protection issues has increasingly become a solitary task.

■ Most common to report to management

Most DPO report to the director general, CEO or director (management), 57 per cent. Just over a third report to their immediate manager, 36 per cent. It is less common to report to the chief administrative officer, data protection coordinator, work group, in-house lawyer, IT manager, GDPR group, chief legal officer or head of department, 9 per cent.

Figure 13

Who do you report to in matters relating to data protection? *Multiple alternatives can be selected*



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).

*"Municipal board" alternative was only offered to respondents who stated that they were active within a municipality.

Comments

Compared with 2019, this year's survey shows relatively small changes in who DPO report to.

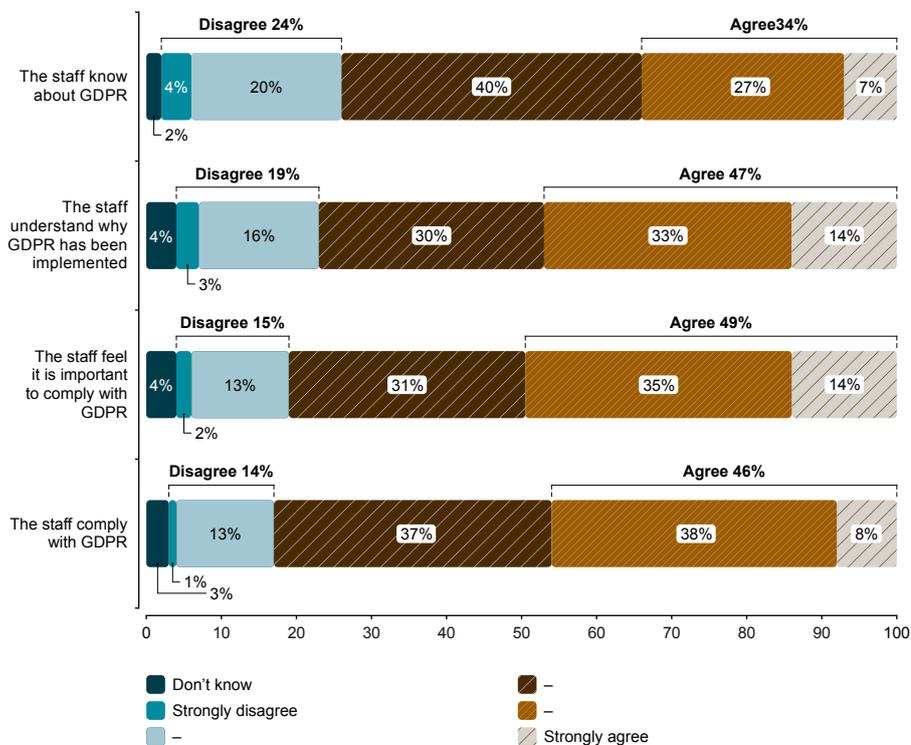
■ Fragmented picture

The results give a fragmented picture of the situation in different organisations. For example, every third DPO agrees with the statement that staff in their organisation have knowledge of GDPR, 34 per cent. However, every fourth DPO states that this is not the situation in their organisation, 24 per cent.

Similarly, almost half of DPO report that the staff in their organisation comply with GDPR, 46 per cent, while others describe the reverse situation, 14 per cent.

Figure 14

To what extent do you agree with the following statements about your organisation?



Source: Sifo. Base: All, 805 interviews.

Comments

The implementation of GDPR in practice requires coordination at several levels in the organisation. By investing resources and prioritising, management defines the framework for the organisation's data protection work. Management should also create good conditions for the DPO's work with data protection issues. But the individual employee is just as important. It is not possible to live up to the requirements of GDPR and ensure functioning data protection in practice without the individual employee following internal guidelines and procedures aimed at protecting personal data.

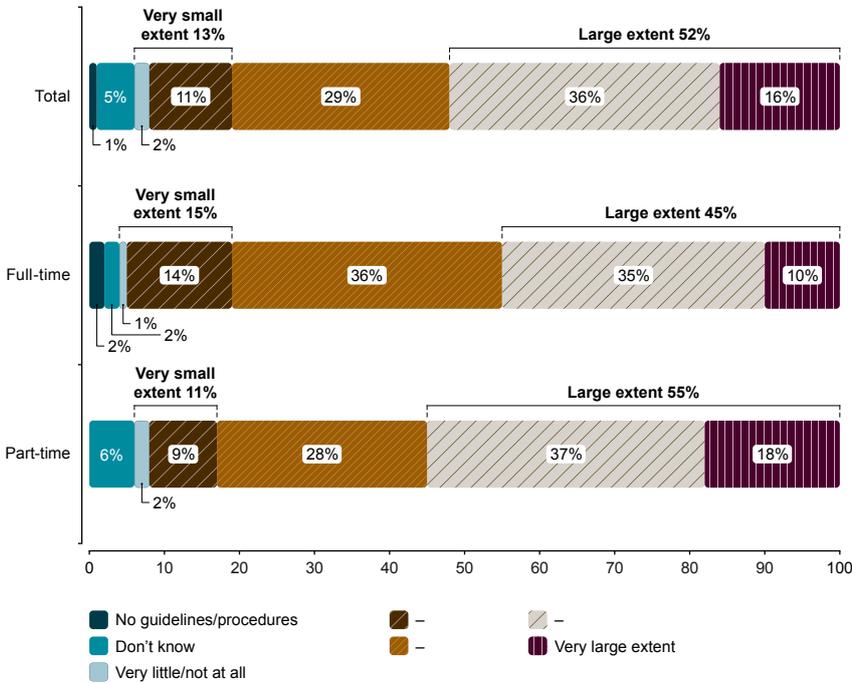
It is concerning if as many as half of employees do not have sufficient knowledge of their own organisation's internal guidelines and procedures for processing personal

data and thus are unable to follow them. It is also concerning if the attitude is that it is not important to comply with GDPR. This does not create good conditions for actual compliance. As a public authority, we see an increased risk of breaches in personal data in organisations unable to establish the understanding, knowledge and acceptance required for the entire organisation to be able to comply with the common European rules for privacy and data protection. In repeated studies of personal data breaches reported to IMY, we have been able to establish that human error is the most common cause. A recurring recommendation has thus been to ensure that staff can take their responsibility to ensure secure processing of personal data by offering regular training.

Half state that guidelines and procedures are followed to a large extent

Just over half state that the organisation largely follows its own guidelines and procedures for how personal data should be processed according to GDPR, 52 per cent. At the same time, 1 in 10 believes that they are only followed to a very small extent, or not at all, 13 per cent. Fewer full-time DPO believe that guidelines and procedures are followed to a large extent, 45 per cent. The corresponding figure for part-time DPO is 55 per cent.

Figure 15
To what extent are the organisation’s guidelines and procedures for managing and using personal data in accordance with GDPR complied with?



Source: Sifo. Base: All, 805 interviews, 189 (full-time), 520 interviews (part-time).

Comments

Internal guidelines and procedures exist to ensure and facilitate the entire organisation complying with the requirements defined by GDPR. It is therefore problematic that almost half of all DPO state that

- they do not know whether guidelines and procedures are complied with
- there are no guidelines or procedures in the organisation
- the guidelines and procedures that do exist are only followed to a very limited extent or not at all.

Chapter 3.

The biggest challenges: Create practical procedures and integrate the data protection rules with the organisation

Data protection in practice seems to have entered a new phase compared with 2019. The initial difficulties for personal data controllers in understanding and implementing the requirements of GDPR seem to have eased – at least in the organisations included in the survey. Instead, DPO argue that a big challenge is now that the regulations are seen as an obstacle to the organisation and that GDPR makes the work of the organisation more difficult.

The findings in brief

- The two biggest challenges are achieving functioning procedures and processes
- More DPO state that the biggest challenge is that data protection rules obstruct or hamper the organisation.
- More DPO feel that the biggest problem is a lack of commitment and knowledge on the part of management.
- Fewer DPO feel that interpreting the regulations is a major challenge.

■ The biggest challenges

Implementing GDPR requirements for processing personal data in daily operations is a constant effort for all such organisations. The primary challenges identified by DPO will evolve over time.

In this year's survey, DPO could choose from among twelve alternatives of the biggest challenges from GDPR. DPO could select multiple alternatives. Compiling the results revealed a list of what most DPOs find challenging.

Figure 16
Compilation of results from 2019 and 2022

The biggest challenges with the GDPR	2019		2022		Short-term trend
	Rank	Percentage	Rank	Percentage	
Achieving functioning procedures and processes	1	50%	2	47%	→
Unclear how to interpret the provisions	2	45%	5	29%	↓
GDPR is perceived as an obstacle/problematic for the organisation	3	36%	1	49%	↑
Balancing providing advice and supervision in the role of data protection officer	4	33%	3	39%	→
Old IT systems	5	32%	6	25%	→
Lack of staff	6	31%	4	36%	→
Difficult to get the organisation's staff to work according to GDPR	7	24%	7	24%	→
Lack of financial resources for such things as investments	8	18%	11	15%	→
Lack of involvement from management	9	15%	8	23%	↗
Lack of knowledge from management	10	14%	9	22%	↗
Difficult to convince management	11	11%	10	16%	→
To understand liabilities resulting from GDPR	12	6%	12	6%	→

Source: Sifo and Novus, respectively. Base: All, 805 interviews (2022), 1,687 interviews (2019).

Figure 16 shows the ranking of the twelve alternatives on the list in 2019 and 2022, respectively, and the percentage of DPO that chose each alternative. The arrows in the figure indicate the direction of the trend (↑ indicates a clear upward trend compared with 2019, ↓ indicates a clear downward trend compared with 2019, → indicates unchanged compared with 2019, ↗ indicates a slightly upward trend compared with 2019).



Excerpts from open responses

Big difference between practice and regulations.

Varying understanding and interest in the importance of legal compliance.

Managing to do everything that I as [data protection officer] believe should be done in the time allocated and finding training courses at the relevant level to build skills. Often think that courses are at a far too basic level.

To be forced to violate GDPR, such as third-country transfers, cloud services and to get [the personal data controller] to take responsibility. I feel that [the personal data controller] feels they have fulfilled their GDPR responsibility by appointing a data protection officer. Personal data is then sent to the United States and other places without reflection. IMY also offers no guidance, so it gets lonely.

Quick guides for training staff categories would be good to have.

Unclear regulations for non-profit organisations.

The owner is an international group with policies and guidelines in English.

More support from IMY is needed for interpreting legislation and acknowledgement of solutions.

Comments

Data protection in practice seems to have entered a new phase. There seems to be a clear decrease in the initial difficulties in understanding and implementing GDPR – at least in the organisations included in the survey. Although this is expected after four years of GDPR, we consider the development to be positive.

DPO now argue that it is a big challenge that the regulations are seen as an obstacle to the organisation and that GDPR makes the work of the organisation more difficult. We are sympathetic to this feeling and that change processes and implementing systematic and continual data protection work are demanding. It places new demands on all levels of the organisation – on the individual employee, on the DPO and on management.

It becomes even more challenging for DPO working in organisations with a passive management. More DPO than before point to both a lack of commitment and knowledge on the part of their own management. Management sets the tone, sets the ambition level for the organisation, prioritises resources and development funds, and describes what is expected of staff. Without upper management becoming involved in data protection issues, the organisation will continue to have challenges in implementing and complying with data protection regulations and the job of DPO will continue to be challenging.

Annex 1.

Method and limitations

About the survey

IMY commissioned Kantar Sifo to conduct an online survey about data protection work in practice. The survey aims to describe how DPO experience their situation and their ability to satisfactorily ensure the internal application of data protection within their own organisation. The study also gives a picture of how far organisations have come in their work with privacy and data protection four years after GDPR became law.

Review process in brief

- Method: Online survey
- Cohort: Interviews among DPO for organisations mandated to appoint a data protection officer to comply with GDPR.
- Cohort: 4,637 organisations
- The study cohort after attrition: 3,557 organisations
- No. of replies: 805
- Participation rate: 23 per cent
- Field period: 16–30 March 2022

About the respondents

Invitations to participate in the survey were sent to registered DPO for organisations mandated to appoint a data protection officer by GDPR. DPO who are responsible for 1–2 organisations received an invitation for each organisation. DPO who are responsible for 3 or more organisations received an invitation to 2 of the organisations, which were randomly selected to avoid an excessive workload for the DPO. Each email invitation clarified which organisation it applied to. During the field period, a reminder invitation was sent to those who had not yet completed the online survey.

Sources of error and attrition

Note that sources of error arose during the selection.

- New DPO had been appointed without being registered and updated in IMY's database.
- The database included out-of-date information on the number of organisations for which the DPO were responsible.

The incorrect or out-of-date information in IMY's database led to people who are no longer active as DPO being invited to fill in the online survey. For this or for other reasons, it became obvious that we did not always reach the target group when the online survey was returned to Sifo. Some respondents did not want to participate in the survey and others ended their participation. The attrition is reported in the table.

Figure 17

Survey of data protection officers	Total	1 organisation	2 organisations	3 and more organisations
Number of recipients in the cohort	4,637	2,813	712	1,112
Not in the target group (revealed by the survey)	693			
Refused to participate (revealed by the survey)	17			
Stopped answering the survey	370			
Number of recipients after attrition	3,557	2,047	588	922
Number of responses	805	426	137	242
Percentage of responses	23%	21%	23%	26%

Risk of skewed results

Due to the survey's relatively low participation rate (23 per cent), there is a risk that the results are skewed. This means that it is not certain that the DPOs who answered the online survey reflect the entire group. If more people had participated in the survey, the results might have changed somewhat. Thus, the results presented in this report are not representative, which severely limits our ability to draw far-reaching conclusions that apply at the group level. Instead, the results of the survey reflect the state of data protection in practice in the spring of 2022, as experienced by the DPO who participated in the survey.

Uncertainty in comparisons with 2019

The report includes figures that compare the results from our 2022 survey with the results from the corresponding 2019 survey, which is reported in the *Nationell integritetsrapport 2019* (National Privacy Report 2019) (Data Inspection Authority Report 2019:2). Note that the 2019 survey had a higher participation rate, 44 per cent, and a slightly larger study cohort, 3,851 organisations. Comparisons must be made with caution.

About Kantar Sifo

Kantar Sifo is an analysis and research company that was founded in 1954 and has its headquarters in Stockholm. The company follows the ethical rules for market research established by the European Society for Opinion and Market Research (ICC/ESOMAR). In addition, surveying in Sweden is monitored by the Ethical Council for Market Research (ERM), whose mission is to ensure that ESOMAR's guidelines are followed by the industry. Among other things, the guidelines deal with the protection of respondent anonymity.

Annex 2.

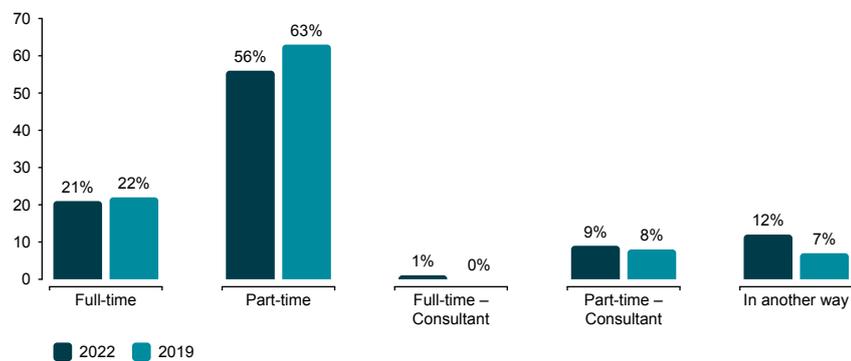
Additional figures and comparisons with 2019

■ Half work part-time with data protection

More than half of data protection officers (DPO) work part-time with data protection issues, while one in five works full-time with data protection issues. Data protection officers working as consultants state that they usually do so on a part-time basis. Every tenth data protection officer works as a part-time consultant with data protection issues.

Figure 18

Do you work full-time or part-time as a data protection officer?



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).

Comments

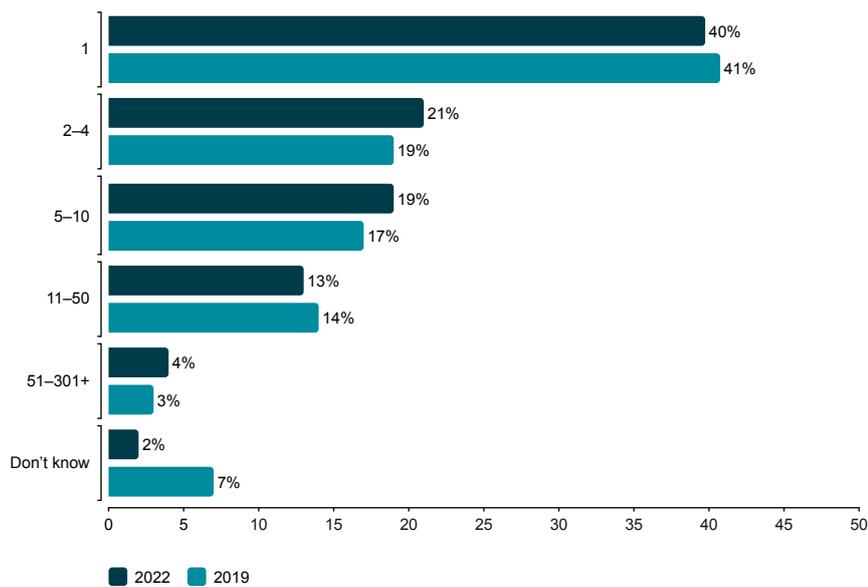
The overall pattern is unchanged from 2019. Part-time was most common even then.

■ Most are responsible for several organisations

More than half of the DPO are responsible for more than one organisation. Four out of 10 state that they are only responsible for one organisation.

Figure 19

How many organisations, i.e. personal data controllers, are included in your responsibilities as a data protection officer?



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).

Comments

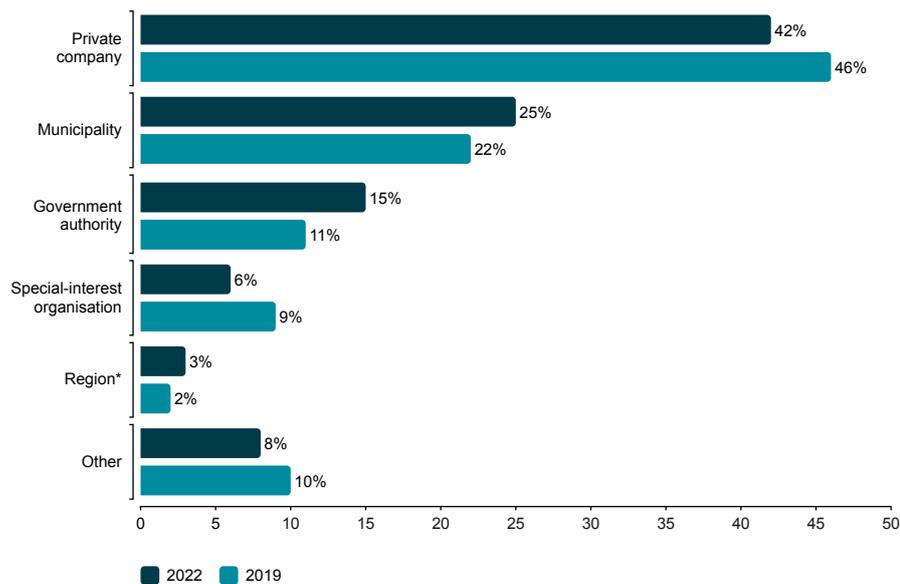
The overall pattern is unchanged from 2019. Serving as a DPO at multiple organisations was most common even then.

■ Most data protection officers work in private companies

Most DPO work in private companies, 42 per cent. The rest work in municipalities, 25 per cent, government authorities, 15 per cent, special-interest organisations, 6 per cent, regions, 3 per cent, and other, 8 per cent.

Figure 20

What type of organisation is your organisation/does your organisation belong to?



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).
*This answer alternative was called "County council" in 2019.

Comments

Note that the distribution does not reflect the actual distribution among DPO in Sweden. The distribution only reflects the distribution among the responses received. We do not know how well the responses in the survey reflect Sweden overall. Thus, we lack knowledge of whether our 2022 survey is skewed compared to Sweden as a whole, making the results non-representative for all organisations.

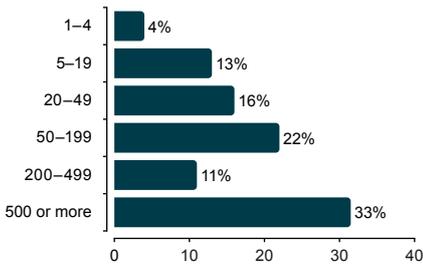
However, the overall pattern regarding the distribution among the participating organisations is basically unchanged from 2019.

Most work in smaller private companies, regions and organisations

Two-thirds of DPO state that they work in small or medium-sized private companies, regions or special-interest organisations. A third state that they work in a workplace with 500 or more employees, 33 per cent. Of the DPO who responded to the survey and who work for a private company, the majority are active in the following industries:

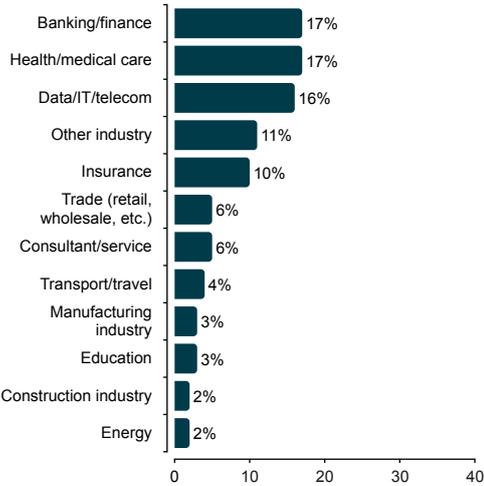
- banking/finance, 17 per cent
- medical care/health care, 17 per cent
- data/IT/telecom, 16 per cent.

Figure 21
 Organisation: *Private company/region/special-interest organisation*
How many employees does your workplace have in total?



Organisation: *Private company*
Which of the following industries are you active in?

NOTE: Only industries with at least 2 per cent of DPOs are listed



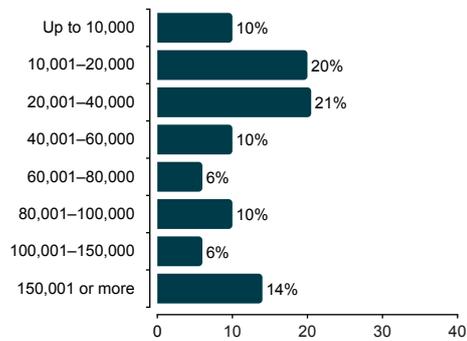
Source: Sifo. Base: Type of organisation, 124 interviews (government authority), 203 interviews (municipality), 28 interviews (region), 339 interviews (private company), 45 interviews (special-interest organisation).

■ About the organisation – private company

Figure 22

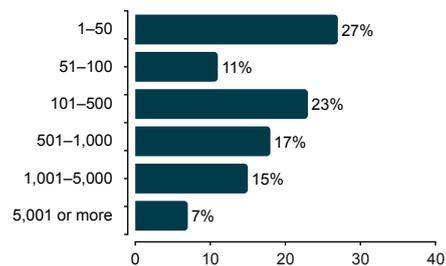
Organisation: Municipality

How many people live in the municipality where you are active?



Organisation: government authority

How many employees does the authority have in total?



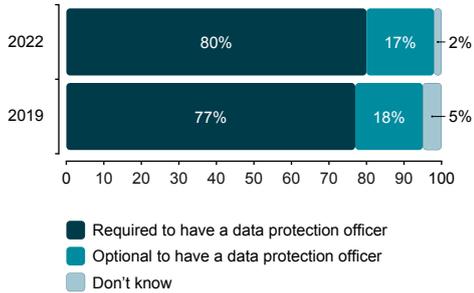
Source: Sifo. Base: Type of organisation, 124 interviews (government authority), 203 interviews (municipality), 28 interviews (region), 339 interviews (private company), 45 interviews (special-interest organisation).

Figure 22 presents background variables on the size of the municipality and the authorities within which the DPO in the survey are active.

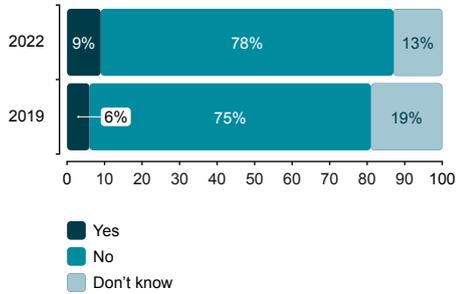
Most organisations are required to have a data protection officer

Eight out of 10 DPO state that their organisation is required to have a data protection officer, 80 per cent. One in 10 DPO state that the organisation is covered by the Criminal Data Act.

Figure 23
Is your organisation required to have a data protection officer or is it optional?



Is your organisation covered by the Criminal Data Act (2018:1177)?



Source: Sifo. Base: All, 805 interviews (2022), 1,687 interviews (2019).

Comments

Based on these figures, we cannot determine whether there has been any change since 2019; the data is too uncertain. However, the levels seem to be relatively similar. The overall pattern is unchanged from 2019.

This is IMY

The Swedish Authority for Privacy Protection (IMY) works to protect all citizens' personal data, for example about health and finances, so that it is handled correctly and does not end up in the wrong hands. We ensure that companies, authorities and others comply with GDPR – the data protection regulation. We train and guide those who process personal data. We also make recommendations on legislation. We want to see a sustainable and privacy-friendly digitalisation. We are convinced that it is possible to protect the security of citizens and the security of society without unjustified tracking and surveillance. Together with other data protection authorities in the EU, we work to ensure that the personal data of citizens has the same protection throughout the Union. We also work to ensure that credit reporting and debt collection are conducted properly. Our vision is a secure information society, where we work together to protect personal privacy.

Contact IMY

E-mail: imy@imy.se

Web: www.imy.se

Tel: +46-(0)8-657 61 00

Postal address:

IMY Swedish Authority for Privacy Protection
Box 8114, 104 20 Stockholm
Sweden