



LFS Methodology Workshop 2019 in Budapest

GDPR's impact on data collection of the Slovenian LFS

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Introduction

More than half of all responses in the Slovenian Labour Force Survey are proxy reports. Putting quality issues concerning proxy slightly aside, the paper will mainly focus on the issues caused by the implementation of the General Data Protection Regulation (GDPR) at Statistical Office of the Republic of Slovenia (SURS) and its influence on the data collection. As the consequence of the GDPR, modifications were needed in different stages of data collection and field work. Even though the solutions implemented in the LFS were part of the common implementation carried out at SURS, the paper will deal with major problems and dilemmas that we have faced within the LFS.

In the first stage changes were needed in the advance letters that inform and invite selected persons to participate in the interview, adding information on the contact for the questions on data protection and as well as deleting the part where we informed them of the monitoring of the interviewers by listening (not recording) to monitor the quality. By deleting the information on the listening of the interviewers, we have also stopped this kind of interviewers' monitoring. That all meant only minor developments and modifications were needed and those influenced mainly the organisational aspects of field work and data collection.

The issue we would like to address and emphasise in the paper is connected to the changes implemented in the CATI mode of data collection, CATI survey design and CATI monitoring. Since any person (old enough) of the contacted household could respond for all other household members, we had to make sure they are familiar with the purpose and content of the survey and with all the contacts for further information and data protection. This proposed step raised concerns whether the proxy respondent contacted via telephone would still be patient enough to listen to additional legal information before the start of the actual survey. Those additional elements in the first contact with the respondent could bring higher non-response. The paper will present our efforts to minimize the burden and effects of those obligatory elements. While the monitoring of those effects proved to be extremely difficult, some assessments of the impact on the responses could still be made.

The second part of the paper will focus on some other changes that implementation of the GDPR brought into the field work and data collection at SURS, e.g. additional contents in the interviewers training and instructions.

GDPR and national data protection laws

The General Data Protection Regulation (GDPR) went into effect on 25 May 2018. It has impacts on how institutions and companies collect, use and store personal data. The GDPR have therefore impacted also the household or individuals surveys. In the months following the implementation of the GDPR the awareness of the importance of the protection of personal data was at a high point. This was also present on the field since many interviewers shared experiences of being rejected or pressured due to the concerns regarding data protection and GDPR. It has happened both in personal and telephone interviews.

The GDPR is EU Regulation and there are also many (long existing) national regulations and laws concerning the data protection. National laws accompanied by the GDPR represent a great challenge not only in the field of the use and storage of personal data but probably even more on the field of the data collection. Therefore the National statistical institutes have to be agile and adapt to the changes brought by the new regulations and new even stricter rules of data protection - especially the sections dealing with the surveys of households and individuals.

In the Statistical Office of Slovenia we have tried to prepare a general solution for as many surveys possible. It may be too early to measure the effects of the adjustments implemented but nevertheless some first insights could be useful for the further improvements.

The changes implemented in the data collection

The latest results from the 4th quarter of 2018 show the rate of proxy interviews being at 60%. Having that information in mind one can be certain that any change brought to the proxy respondents could influence the survey. The changes we have implemented into surveys of households and individuals were not so drastic. As a consequence we have not expected any major effects seen in the results. Our major concerns were connected to the response rates.

What changes have we implemented regarding the personal data protection and which stages of data collection have those changes impacted?

Due to some revisions and new rules on personal data protection we had to make some changes of survey protocols. Changes were implemented in all the surveys allowing proxy response (LFS, SILC, Tourism Travels of Domestic Population). What was the main issue? The essential problem of proxy responses was the probability that the proxy respondent answering to the telephone interview had not necessarily been acquainted with the content of the survey, its legal basis and the respondent's rights (e.g. survey's non-compulsory, contact in case of questions or concerns regarding data protection etc.). All those information could be gained by reading the advance letter – letter that is sent to all the households with the invitation to participate in the survey with all other information included. The letter includes a statement that it is addressed to one member of a household but in intended for the whole household, as well as that the questions might be answered by any adult member on behalf of the entire household. The letter is always addressed to the certain person – to the selected person.

Before the January 2019, the month since changes have been implemented, the respondent who answered the phone call was only asked confirm their identity and invited to take part in the survey. Otherwise it was either marked to be called later (or at specific agreed time/date) or to be marked as refusal and consequently as a non-response. It was not important if it was proxy respondent or if it was the person to whom the advance letter was addressed. The changes of the Survey Protocol for the Labour Force Survey brought up some detailed summary of the content of the advance letter containing the brief content of the survey, legal basis and general contacts (for information on the survey and data protection) when further explanations were needed. It has changed only for person that have been answering the survey and not being the recipients of the advance letter. We have assumed that recipients of the advance letter, namely those to whom the advance letter was addressed to, have been aware of its content. For any others, so called proxy persons, the Survey Protocol have been changed to ensure the opportunity for everyone to be acquainted of the survey's content and their respondent's rights.

We have added a few questions to the Survey Protocol in all the household surveys where the CATI method is used. In the Annex the current Survey Protocol for the Labour Force Survey is presented. If the person who answer the phone is not the addressee of the letter, the interviewer asks the question on whether person is familiar with the content of the letter that the office have sent them (question T2). If not the interviewer has to inform them of the brief content of the letter (T3), including information on:

- The purpose of the survey,
- Legal basis – legal acts (national and EU regulations),
- Voluntary participation,
- Statement to protect the data,
- Contacts in case further information on the survey or on data protection is needed.

The above points are the mandatory elements of the letter, as well as the summary that has to be read to the respondents not familiar with the advance letter. If after the reading of the letter content the respondent allows the further questioning the interviewer proceeds with the survey as it was before the changes. In case of termination of the interview (refusal or interruption during the reading) the interviewer proceeds with the mark of non-response or later appointment. Among the reasons for the refusal we have added a category of refusal due to the acquaintance with the mandatory elements of the advance letter.

Apart from the changes of the Survey Protocol for the CATI, also the monitoring of the CATI interviewers has changed. Before the implementation of the GDPR the standard procedure of monitoring of the CATI was the listening (not recording) to the selected interviewers. The respondents were notified about the procedure in the advance letter. After the GDPR's implementation the sentence of monitoring was deleted from the letter and the controllers stopped with the procedure of listening to the telephone interviewers.

What do the first results show regarding the changes implemented to be more in line with the laws and regulations on personal data protection?

The first results of the impact of the changes in the Survey Protocol of CATI for the LFS

The first brief results for the 1st quarter of 2019, which was the first quarter when the new Survey Protocol was used for the LFS, show very low impact of the questions added to the CATI. Of 148 so called proxy persons, 10 were not familiar with the advance letter. Of those 10 proxy persons not familiar with the letter, 8 were willing to continue with the survey. Only 2 of proxy persons declined further interviewing or made a later appointment. Data on CATI response and added questions could be found in the table below.

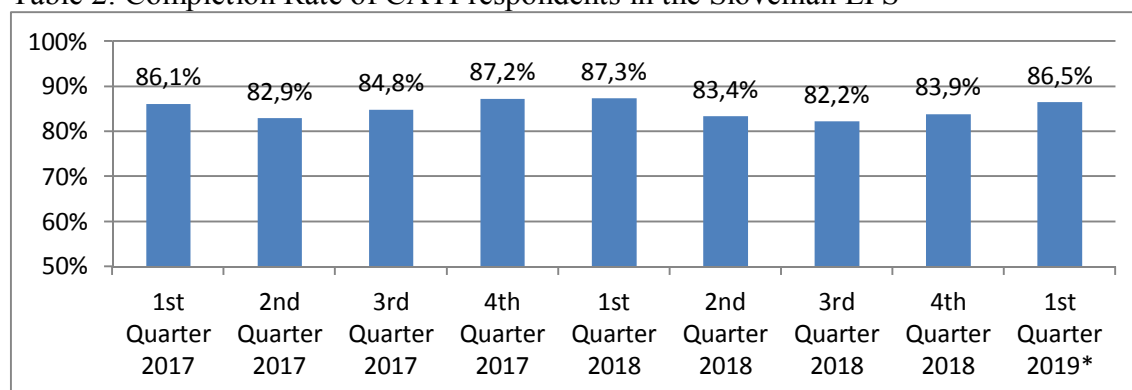
Table 1: Information on CATI respondents in the Slovenian LFS, 1st quarter 2019

Total CATI responses	4081
... addressee	3932
... proxy person	149
..... familiar with the content of letter	138
..... not familiar with the content of letter	10
..... continue the interview	8
..... refusal or appointment	2
Overall CATI completion rate	86.5%

Source: SURS, Labour Force Survey

Among all of the CATI non-responses we have recorded no answers to reason for non-response being the “getting familiar with the mandatory elements of the advance letter”. The initial concern that the changes might cause the higher non-response has currently not been shown in the first results based on the 1st quarter of 2019.

Table 2: Completion Rate of CATI respondents in the Slovenian LFS



* Preliminary data

If we look at the completion rate (responses/sample) by CATI data collection we even see it's increase after the introduction of GDPR information. Completion rate in last two years is quite variable and it was lower in the quarters when GDPR regulation came in force. But we see that it was the lowest in 2nd and 3rd quarter also in a year before the introduction of GDPR. So completion rate by CATI data collection in the last two years don't demonstrate concrete effects of GDPR introduction. It is very similar with completion rates for the first wave face-to-face CAPI data collection in LFS.

The overall experience with the changes implemented shows that even though some assessments could be made their impact proved to be extremely difficult to monitor. Mainly this has been due to the difficulty of measuring the impact of different elements on the non-response separately of one another.

Other changes and adjustments connected to data collection

The GDPR, national personal data protection laws and greater awareness of the data protection rights forces companies and as well statistical offices to adapt in many different field of their work. Beside the changes implemented in the telephone mode of data collection Slovenian statistical office have implemented also other changes or adjustments connected to the field work.

In the first stage all the interviewers were informed about the GDPR as well as on how to deal with questions and concerns regarding the higher awareness of the personal data collection rights. The legal department prepared the summary of main changes. All the methodological notes and instructions for the interviewers were checked (most of them were already in line with the personal data protection regulations).

The second adjustment is linked to the advance letters. Much has already been written in this paper about the advance letters that are addressed to the selected persons. The same as to the telephone interviews some additional elements were also added to the advance letter. SURS have a person responsible for everything regarding the personal data protection – for the monitoring of its implementation, for fulfilling the regulations, for dealing with the users' and respondents' question on this matter. The contact (e-mail address) of the SURS' Data Protection Officer was added to all of the different versions of advance letters (for all modes CAPI, CATI, CAWI), to the reminders and to the home web page for the currently active web survey.

Conclusions

The GDPR and stricter rules of personal data protection represent a great challenge for the data collection in the field of households and individuals surveys. Labour Force Survey is one of the biggest household surveys and as such under huge pressure when implementing changes. The action of bringing changes into the Survey Protocols of the CATI surveys initiated by the needs of even better personal data protection was an overall action for all the affected surveys. SURS tried to create a standardised procedure for all but quickly the task proved to be extremely difficult. All the surveys have their own characteristics which represented a great issue for the standardisation. In the end the presented Survey Protocol was made as a compromise to be in line with the regulations. Time will still be needed to finally make a conclusion of its impact on the data collection and on non-response.

The first results have been more or less in line with the expectations, even though only one quarter could not be completely enough for the final conclusions. Before the implementation of the changes our main concern at the office was the extent of the content of the additional questions and the burden they might represent to the respondents that would in the end cause the increase of non-response. It might be that even with more metadata on the non-responses and data on the respondents familiar/not familiar with all the mandatory elements that need to be presented to them, we could not distinguish the impact of those additional questions to the overall CATI non-response.

Annex: Current Survey Protocol for the Labour Force Survey

Survey Protocol for the Labour Force Survey - For cases where a proxy person is interviewed (a person who is not the addressee of the advance letter)

Phone number: [XXXXXXXXXX] Code: [XXXXXXXXXX]

T1 Good morning/afternoon, my name is ... I'm calling from the Statistical Office of the Republic of Slovenia, where we are conducting the Labour Force Survey, about which we have already informed you with our letter. Am I speaking with [Name and surname of the person who is the addressee of the advance letter (Year of Birth)]?

[Name and surname of the household member year of birth]

[Name and surname of the household member year of birth]

1. Yes → D1
2. No → T2

T2 Are you familiar with the content of the letter we have sent you?

The letter was addressed to the selected person (Name, surname and (year of birth)), and is intended for the whole household.

1. Yes → D1
2. No → T3

T3 I need to acquaint you with the content of this letter:

We are collecting data on persons in employment, unemployed and inactive persons. We want to find out the actual situation on the Slovenian labour market.

The survey is carried out in accordance with the National Statistics Act (published in the Official Gazette of the Republic of Slovenia, No. 45/95 and No. 9/01), the Annual Programme of Statistical Surveys (published in the Official Gazette of the Republic of Slovenia, No. 66/17) and Regulation (EC) No. 577/98.

Your participation is voluntary.

We will carefully protect all the information that you will entrust to us (in accordance with the Personal Data Protection Act).

For additional information regarding the protection of personal data, please contact us at dpo.surs@gov.si. For additional questions regarding the survey you can contact anketni-studio.surs@gov.si.

1. Continue → D1
2. Termination of the interview → Ctrl+S (Non-response, Appointment)

The other introductory section of the questionnaire remains unchanged.