



## THE EUROPEAN COMMISSION: WHERE NOW? WHERE NEXT?

### Data Management Plan

#### 1. Assessment of existing data

Following the election of Commission President Jean-Claude Juncker in 2014, the European Commission designated itself a 'political Commission' and introduced new ways of working. [This project](#) assesses the impact of those changes. It investigates what Commission staff understand by the 'political Commission' and how they regard the operation of the new methods, including the introduction of policy teams led by Commission Vice Presidents. In order to assess how the Commission has changed over the last three administrations and how the Juncker Commission compares with its predecessors, it investigates three further areas:

- what attracts staff to work in the Commission, their careers before and after they joined the organization, and their experience of the Commission as a workplace
- how staff view the success of the Commission's gender action plan and talent management policy
- the attitudes, beliefs and values, and the motivation and expectations of personnel, with a view to assessing the extent to which, if at all, they have changed or evolved since 2008 and 2014, and how they differ, if at all, by gender, age group, cohort, nationality and staff grouping.

As well as advancing understanding of the European Commission, creating new knowledge concerning how the institution has changed since 2014, and testing accepted wisdoms about the EU civil service and the people who work for it, the project will deliver findings that will be used by the Commission as it takes decisions concerning its organization and operation. The analyses of the data collected as part of the project will be available: to the current Commission as it formulates its input into the MFF negotiations, mindful of recruitment issues and the attractiveness of the Commission as a workplace to qualified candidates at different career stages and from all EU member states; to the incoming Commission in 2019 when it makes decisions about how best to organize its working methods of the College; and to the current and incoming Commission when considering developments in the area of personnel policy, including diversity, career development, and management.

#### 2. Datasets to be produced

**Quantitative data:** Responses to an online survey administered to the population of European Commission staff. The purpose of the survey, the use to which the data collected will be put, and the identity of the researchers will be explained to respondents before they complete the survey. Throughout the survey respondents will have the options 'Do not know' and 'Prefer not to say', they will not be required to answer any questions and will be free to exit the survey at any point. Questions will cover: backgrounds, beliefs, views on today's EU, the European Commission as an organization, and experience of work and the working environment. The survey will be conducted using Qualtrics and the responses analysed in SPSS v25. The raw survey data will be anonymised and stored (and backed-up) by Qualtrics



in their EU data centres – we have signed Qualtrics Service Order and Master Services Agreement, which confirms that the data resides in the EU and the technical security of the data. All data held by Qualtrics will be destroyed at the end of this phase of the project. Anonymised data that is downloaded for analysis will be password-protected and encrypted. Data will be stored on the University centrally managed facilities backed up on a 24hr basis with access restricted to authorised individuals only.

**Qualitative data:** A short round of reflective interviews with a small self-selected sample, which will enable an initial exploration of responses to the online survey, will be followed by a structured programme of follow-up interviews with senior managers, Commissioners, members of Cabinet, and a random sample of managers, other AD staff members, and AST staff, and focus groups with non-management administrators, assistants, contract agents, temporary agents and seconded national officials. These will address the new working methods of the European Commission, the European Commission as a workplace, personnel policy, networking, and performance management. Interviews will be conducted in pairs. The purpose of the interview, the use to which the data collected will be put, and privacy/anonymity protection will be explained to interviewees or focus group participants in a letter of invitation, and repeated before the interview begins, which will allow respondents to decline either before or at any point during the interview or focus group.

Where respondents permit the interviews will be digitally audio recorded (MP3). Otherwise written notes will be taken. In the case of focus groups, participants will be offered the opportunity to protect their anonymity by using a name that they choose. Focus group sessions will be digitally recorded (MP3). Interview/focus group notes and recordings will be anonymised after the data has been collected. The anonymised digital recordings will be transcribed in MS Word and analysed using ATLAS. All versions of the data will be anonymised, password protected and encrypted. Data will be stored on the University centrally managed facilities backed up on a 24hr basis with access restricted to authorised individuals. Transcription will be undertaken by a third party based in the UK who will be required to undertake a data processing agreement (either standalone or within the contract), in which they will undertake a commitment to store the data in a secure manner within the EU and to destroy the recordings once the transcription is completed. The research team will retain securely stored anonymised recordings for a year after collection, to provide verification and quality checks of the transcriptions, and will thereafter destroy the recordings.

### 3. Quality assurance

The Principal Investigator (PI) Professor Hussein Kassim and main Co-Investigator (Co-I) Professor Sara Connolly will be jointly responsible for overall quality assurance and specific measures to ensure quality control. The online survey will be piloted and tested before its launch. Interview protocols will be developed, piloted and refined. Interviews will always involve two researchers. Quality control for the qualitative data collection will be assured through briefing sessions and interview templates circulated to team members and research assistants. Either the PI Kassim or main Co-I Connolly will check through each transcript for consistency with agreed standards.

Where translations are necessary, quality will be assured by one other researcher fluent in that language checking against the original survey, recording or notes.

Quality assurance protocols will be derived for all data collection and processing stages to



ensure data are collected as consistently as possible and filenames are standardised. Information on the quality and reliability of the data utilised by the project will be developed. This will also indicate the questionnaire, interview template and show cards used in the data collection and any statistical procedures (weighting or other coding) that have been applied to the data.

#### **4. Data back-up procedures**

All collected data will be anonymised, stored securely and regularly backed-up. The online survey will be administered using Qualtrics, the raw data collected through the online survey will be stored and backed-up (within the EU) for the duration of the data collection by Qualtrics. All digital data - the SPSS data files downloaded from the survey, the digital audio recordings, and the MS Word transcripts – will be password protected and encrypted.

All project data will be stored on UEA's secure Research Storage Infrastructure, based on IBM enterprise grade Storage Area Network (SAN) hardware housed in secure, environmentally controlled and monitored data centres. Data will be regularly backed up to tape with copies in both data centres at UEA. All of the secure Research Storage Infrastructure is located in a segregated part of the network to ensure that administrative access is limited to ITCS staff and it's support partners. Data access is controlled by security Access Control Lists (ACL) where only those assigned access by way of membership of security groups can gain access. Those user credentials and security groups are provided by the University's central Active Directory based domain.

#### **5. Data protection, anonymity and confidentiality**

The data from the online survey will be cleaned and prepared for analysis by Professor Sara Connolly, UEA. The preparation for analysis will involve aggregation across some personal and professional variables. For example, staff will be categorized by cohort rather than the particular year in which they joined the European Commission. Analysis will proceed on the basis of the aggregated data, which ensures a minimum cell size of 5 in any reported tables or cross-tabulations.

Data from the online survey will be presented or reported in aggregate form only. It will not be possible to identify any individual respondent in the published work produced by members of the research team. Nor will it be possible to identify any interviewee from comments cited in any written or published work. Where quotations from interviews are included in any text, the attribution will be no more specific than the following formulations: 'according to a senior manager in a policy DG', 'a head of unit commented . . .', 'an assistant remarked that . . .', etc.

Data will be collected, stored and used in compliance with the UK Data Protection Legislation, which shall henceforth mean the Data Protection Act 1998, or from the date it comes into effect in the UK the General Data Protection Regulation (EU) 2016/679 (as applicable). The totality of the online survey data will be viewed by three parties only: Qualtrics, the company that supply the proprietary software used to administer the online survey; the research team at the University of East Anglia; and the University of Edinburgh. Qualtrics has published a statement of assurance concerning the technical security of the data – see signed Qualtrics Service Order and Master Services Agreement. UEA and the University of Edinburgh will do the same. UEA and the University of Edinburgh will also establish a data sharing agreement, which specifies the terms of which data will be shared



by and transmitted between the two organizations.

All members of the research team, including research assistants will sign a formal agreement, drawn up at the University of East Anglia, by which, they will acknowledge their obligations under the UK Data Protection Legislation, and will commit themselves to respect the anonymity of all respondents and interviewees, and to the use of the data for the purposes specified by this project only. In practice, only Professor Sara Connolly, UEA and Professor Andrew Thompson, University of Edinburgh, will see the unprocessed data.

All information gathered is subject to a request submitted pursuant to the Freedom of Information Act 2000. Any party receiving such a request will inform all other parties and exemptions will be applied where appropriate.

## **6. Data availability and expected difficulties in data sharing**

Gaining access was extremely difficult given obvious political and organizational sensitivities. As a consequence, data collection with the European Commission was agreed under the following conditions.

- Access to the dataset will be restricted to authorised individuals and their researchers only: PI Professor Hussein Kassim and main CI Professor Sara Connolly, UEA, and Co-Is Professor Michael Bauer, German University of Administrative Sciences, Speyer, Professor Renaud Dehousse, European University Institute Florence, Professor Brigid Laffan, European University Institute Florence, Professor Andrew Thompson, University of Edinburgh, and Dr Pierre Bocquillon, UEA.
- We propose that consideration will be given in due course (and not before 2023) to depositing in the EUI archive partial data from the project in a form that safeguards the anonymity of all and every respondent for consultation by future students and scholars.

## **7. Data copyright/IPR ownership**

The ownership of copyright and intellectual property rights generated by an employee in the course of their employment will be assigned to the University of East Anglia as the organisation carrying out the research and in line with the University of East Anglia's Intellectual Property regulations, subject to any agreement to the contrary. This applies here because the terms of copyright for data collected by partners within this project is defined in the project collaboration agreement with the European Commission.

The European Commission will be invited to sign an agreement that permits the research team to collect the data, analyse the data, and to publish research findings based on the data. An embargo period may form part of that agreement. The agreement will recognize the PI's intellectual property and ownership of the data. The Co-Is will also be asked to sign an agreement which commits to the principles outlined in this document and recognizes the PI's intellectual property.

## **8. Data management**

The PI will have overall responsibility for implementing the data management plan. The University of East Anglia (HUM Faculty) IT Manager will be responsible for advising on all



aspects of data storage and security. Staff involved in the project at participating institutions will be responsible for following the same data management procedures.

## 9. Ethical issues

Approval for this project has already been sought and granted by the General Research Ethics Committee (<http://www.uea.ac.uk/research/research-integrity>) at UEA. All University Research Ethics Committees comply with the ESRC Framework for Research Ethics. The team has significant experience in undertaking research involving personal data that must comply with relevant ethical rules. We will address all consent, ethical, legal, social, and safety issues raised by the research activity in an appropriate manner. The main ethical issues will be safeguarding subjects' privacy and the confidentiality of the data collected. Therefore all data collection, storage and processing will be conducted in alignment with UK Data Protection Legislation. All data will be anonymised (the survey data will be anonymised at collection and the interview/focus group data will be anonymised after collection), when digital version of the data are created they will be encrypted and password protected, no identifying information will be available and tracking down individuals is impossible. Publications or presentations on the results will only report analyses on an aggregated level.

Individuals have a right to be informed of how their personal information is being collected and used by an organisation. The General Data Protection Regulation (GDPR) sets out the information that must be provided, and the most common way to do this is by means of a 'privacy notice'. The research team will write a privacy notice to tell people how and why their data will be used which will be made available to those who participate in the study at the point of data collection.