

THE EUROPEAN COMMISSION: FACING THE FUTURE

Data Management Plan

1. Assessment of existing data

The aim of the project is to investigate the backgrounds, careers, and beliefs of all major staff groupings, as well as their experience of the Commission as a workplace, their attitudes to the 2013 reform of the Staff Regulations, and their perception of how the EU has been affected by the financial and economic crisis. A review conducted by the research team shows that no comparable data exists. The Commission collects only selective data about its staff – see its occasional staff surveys – and publishes even less. Academic studies have historically relied on relatively thin primary source material. While Coombes (1970) says little about the sources for his classic study; Michelmann (1978) drew on 172 formal interviews and two questionnaires with around 900 respondents, and Page (1997) on data on 2,300 officials from published biographical sources. Stevens and Stevens (2001), meanwhile, refer to more than 40 interviews. Ban (2012) is based on 140 in-depth interviews, Wille (2013) on 50. Even Kassim *et al* (2013), the largest study of the Commission conducted to date, drew on only 1901 responses to an online survey and 207 face-to-face interviews. In common with the aforementioned studies, moreover, it focused on administrators – only one sub-category of permanent officials (the other is administrators – which accounts for less than 40 per cent of the Commission’s overall workforce. Bibliographic directories are even narrower. Their coverage tends to be limited to an even narrower stratum of Commissioners, cabinet members, and managers. In short, the only way for the team to be able to carry out the project is for it to collect an entirely new dataset, centred on an online survey that will be circulated to employees within all major staff groupings; namely, officials (administrators and assistants), contract agents, temporary agents, and seconded national experts). The targeted sample is not only broader, but is six times the size of the population targeted in Kassim *et al* (2013).

2. Datasets to be produced

Quantitative data: Responses to an online survey administered to the population of Commission staff. Questions will cover: backgrounds, beliefs, views on today’s EU, the 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 v21. The raw survey data will be anonymised and stored by Qualtrics, a certified safe harbor, for the duration of the data collection. All data held by Qualtrics will be destroyed at the end of this phase of the project. Anonymised data which 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.

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 Commissioners, cabinet members, and a random selection of managers, and focus groups with non-management administrators, assistants, temporary agents, contract agents and seconded national experts. These will address the internal operation of the Commission, the functioning of the College and the interaction between cabinets and the services, and issues especially pertinent to managers – financial management and control, personnel policy, networking, and performance management. Interviews will be conducted in pairs. The purpose of the interview, and privacy/anonymity protection will explained at the outset, allowing respondent to decline. Where respondents permit the interviews will be digitally audio recorded (MP3). Otherwise written notes will be taken. 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 3rd party who will be required to sign appropriate confidentiality agreements and store data in a secure manner.

3. Quality assurance

The PI and Co-I Connolly will be jointly responsible for overall quality assurance and specific measures to ensure quality control. The online survey has been piloted and will be fully 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 which will be circulated to team members and researcher assistants. Either the PI or 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 for the duration of the data collection by Qualtrics a certified 3rd party safe harbour. All digital data - the SPSS data files downloaded from the survey, the GIF digital audio recordings and the MS Word transcripts – will be password protected and encrypted. Data will be stored on the University of East Anglia centrally managed facilities backed up on a 24hr basis to a safe and secure location/media away from the desktop, back-ups will be retained for the duration of the project.

Data is backed up using IBM Tivoli Storage Manager (TSM) which writes to IBM 3584 robotic tape libraries. Data is vaulted between libraries in physically separate data centres to provide off site disaster recovery. All hardware is hosted in two data centres with UPS power protection and air conditioning. All services are monitored by the University of East Anglia Information Services operations team, who routinely replace failed components with no service disruption due to in built resilience. Secure authorised connection to University of East Anglia computer systems from external computers is available by VPN or enabled by rules on the firewall, which will be approved and configured according to defined policies and procedures.

5. Data protection, anonymity and confidentiality

Data from the online survey will be presented in aggregate form only. It will not be possible, therefore, to identify any individual respondent in the published work reporting the findings. 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: 'as one Commissioner remarked . . .', 'according to the Director General of a spending DG', 'a head of unit from a smaller member state commented . . .', etc.

Data will be collected, stored and used in compliance with the UK Data Protection Act, which implements the EU Data Protection Directive. 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; and members of the research team at the University of East Anglia and the University of Edinburgh. All three parties will submit to the European Commission statements of assurance concerning the technical security of the data within each organization in advance of the administration of the online survey. All three parties will also present to the Commission a data processing agreement, which specifies the terms of which data will be shared by and transmitted between the three 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 Act, 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.

All information gathered is subject to a request submitted pursuant to the Freedom of Information Act 2000, although such claims may be considered prejudicial to UK interests in their international relations with the EU, Freedom of Information Act (Section 27). Exemptions for the

release of any personal data obtained by the research team will be claimed under the Freedom of Information Act, Section 40. Exception for other data will be sought on the grounds that it was obtained in confidence, Freedom of Information Act, Section 41. Exemption for communication received by the research team from participants will be sought on the same grounds.

6. Data availability and expected difficulties in data sharing

Gaining access was extremely difficult given obvious political and organizational sensitivities, as well as the timing of the project (i.e. elections to the European Parliament and selection of a new Commission). As a consequence, data collection with the European Commission was agreed under the following conditions.

- Access to the data will be restricted to authorised individuals only: PI Professor Hussein Kassim, UEA and Co-Is Dr Sara Connolly, UEA, Professor Michael Bauer, German University of Administrative Sciences, Speyer, Professor Renaud Dehousse, Centre d'Etudes Européennes, Sciences Po. Paris, and Professor Andrew Thompson, University of Edinburgh.
- At the discretion of the PI, certain segments of the data may at a later date be shared with Professor Liesbet Hooghe, Free University of Amsterdam, and Professor John Peterson, University of Edinburgh, as a courtesy following their participation in 'The European Commission in Question'. In this event, Professor Hooghe and/or Professor Peterson will be required to submit a similar statement of assurance and data processing agreement, to acknowledge their obligations under the UK Data Protection Act and, in a formal agreement drawn up at the UEA, to commit themselves to respect the anonymity of all respondents and interviewees and to use of the data for the specified purposes of this project only.

Regrettably, it will not be possible at this stage to make a commitment to deposit the data in the UK Data Archive. The PI does, however, undertake to revisit the agreement with the Commission following the completion of the project and seek its permission to make the data more widely available, subject to anonymity and confidentiality guarantees.

7. Data copyright/IPR ownership

The ownership of copyright and intellectual property rights generated by an employee in the course of their employment will rest with 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 PI will own the data generated.

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 University Research Ethics Committee (<http://www.uea.ac.uk/research/research-integrity>) at UEA. The University Research Ethics Committee complies 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 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 FP7 guidelines, Directive 95/46/EC of the European Parliament and of the Council and Directive 97/66/EC. All data will be anonymised, 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.