

# GDPR Personnel Competence Assessment

*Bloor Research and Cognisco have joined forces to provide a human risk-based GDPR (EU General Data Protection Regulation) readiness assessment tool. People are central to an organisation understanding and maintaining consistent compliance with the new GDPR legislation. It isn't enough to have processes, policies or technology in place. The fundamental question the Regulator (or, indeed, an aggrieved data subject) will ask is whether your employees understood the rules and were confident and competent in applying them.*

For GDPR, Bloor's analysts have provided the scenarios, subject matter expertise and assessment content, with Cognisco's Occupational Psychologists ensuring assessment validity. The two organisations will work to provide consistent updates to the assessments as the regulation evolves and plan to work together to develop more assessment topics in the coming months.

Any realistic GDPR strategy will need to approach employee motivation and incentivisation – as well as delivering a positive business-value outcome.

## Opportunity

Cognisco are expert in the assessment and evidence of competence, confidence and compliance and Bloor Research are internationally renowned experts in IT and Data security. The two organisations have collaborated to develop a scenario-based Situational Judgement, Multiple Response Evaluation assessment which looks specifically at whether your employees understand and are confident in applying the new legislation.

A Software as a Service based assessment using Cognisco's unique competence/confidence correlation model and leading reporting and

analytics platform, my\*KNOW gives users access to a series of Bloor-developed scenarios and possible responses which might arise around GDPR.

## What you get

For a small, annual per-person fee, this short rigorous assessment will take no more than 30 minutes for each employee to work through (stopping and starting as they please). On completion, the employee, and the organisation, is presented with an intuitive, granular, report which highlights where each individual is both competent and confident in their understanding and application of GDPR policy; and also where they have knowledge gaps or misunderstandings which will require remediation.

Our tool is not designed to teach those surveyed but to discover whether an investment in further GDPR training, using a third party training specialist, is justified. Organisations (and learners) can then be linked or directed to appropriate learning sources (LMS) or policy documents and can then retake the assessment to evidence they've solved the problem.

Cognisco's my\*KNOW provides a real-time and auditable log of all assessments, results and actions, by

## What is GDPR?

The EU's General Data Protection Regulation (GDPR - "regulation" implies that it is law, intended to be more or less uniform across the EU, although there are still exceptions and specific rules for some states) will apply from 25 May 2018, when it supersedes EU member state implementations of the 1995 Data Protection Directive (DPD – merely being a Directive implies less uniformity across the EU).

In 2018, the UK is still a member of the EU and the GDPR applies in the UK. The UK Data Protection Act 1998 (DPA) will be superseded by a new DPA (which will apply post Brexit) that enacts the GDPR's requirements, from the UK's point of view, although this might not meet the 27 EU states' "equivalency requirements" for GDPR after the UK leaves the EU.

The GDPR means that organisations must significantly change the way in which organisations protect and process personal data. It gives the subjects ("owners") of personal data important new rights, including judicial remedies if these rights are infringed, and mandatory reporting of data breaches. Most importantly, organisations must introduce "appropriate technical and organisational measures" to protect personal data.

individual, for the organisation (people may progress through an assessment at their own pace but can't go back and restart, without Admin/Manager reset). This can support, in part, claims of the addressing of privacy culture. It can direct learners to educational assets or Learning Management Systems and presents evidence of competence and confidence for the compliance, risk and audit functions.

## Multiple-response assessments

Standard knowledge recall or multiple-choice tests only really serve to evidence that someone can recall facts and/or can guess the most likely correct answer from a series of options. They provide no evidence of understanding. In effect, there is no testing of judgement.

In contrast, Cognisco multiple-response assessments will evidence where an individual is both competent and confident in each area we assess, and where individuals do have the competence but lack the confidence to act. They identify knowledge gaps and specific learning requirements and where there are those who lack the required knowledge, but firmly believe they are working and behaving correctly.

The net result is that you will be able to see and evidence, at a granular level, where individuals require coaching (perhaps where they know what to do but lack the confidence), where they have specific learning requirements and where there is an immediate need for remediation. This encourages cost-effective resource utilisation.

Benefits for the individual assesses include:

- Instant feedback on where they're performing well and where they need to invest more effort.
- Direction to the next appropriate action.
- Assessment at a time and place that suits them.
- Assessment can be stopped and restarted in the same place (you can't return to the start), to fit around other commitments.

## Cognisco's Situational Judgement, Multiple Response Evaluation (SET)

Cognisco's standard approach to assessment is scenario based. Subject matter experts (e.g. Bloor) devise a series of scenarios (usually presented in narrative form) that represent the kind of situation or interaction encountered day-to-day. This enables it to test the application of desired skills and capabilities.

The testees are required to evaluate up to 6 responses or courses of action. For each response, they must say whether they think the course of action is correct or incorrect and then indicate how confident they are in their answer, for all the responses in turn, before they move to the next scenario.

Cognisco occupational psychologists work with the subject matter experts to ensure that there are enough "plausible, incorrect" responses in each scenario to differentiate someone who absolutely knows the right answers and approaches and one that might not. The individual will need to assess a situation or scenario from multiple perspectives and in each instance, evidence that they can and will take the correct course of action.

The real value of this approach is the insight it gives the individual and their organisation's leadership team, compliance function and CRO (Chief Risk Officer) into the human talent available to the organisation, both good and bad.

*Armed with this level of insight, organisations are well placed to make evidence based decisions and investments in terms of training and development as well as evidencing to the regulator that they are duly diligent in ensuring both a competent and confident workforce with regard to GDPR provision.*



Bloor is a company founded around one principle:  
*"To enable organisations to choose the optimal technology solutions for their needs"*

For over 25 years, Bloor's analysts and subject management experts ([www.bloor.eu/analysts/](http://www.bloor.eu/analysts/)) have assisted companies to evolve intelligently: by embracing technology, and by adjusting their strategies to achieve the best possible outcomes.

## Additional services available on request:

### Custom surveys

Bloor and Cognisco analysts can customise the tool to address the specific GDPR awareness requirements of particular organisations.

### Facilitated GDPR workshops

GDPR itself is non-negotiable, but its institutionalisation in different organisations will depend on geographical trading patterns and uses of personal information. A US business with limited trade with the UK (where it may well have EU citizens as customers) is still impacted by the GDPR; but the impact will not be as great as that on a European business, mainly trading across the EU and the UK. Companies need to sort out their own GDPR strategies; but external input and critique will help.

### Review of GDPR strategy and training

GDPR compliance requires a formal "data privacy by design" approach and this implies documented policies; and training that ensures that data privacy is an integral part of the organisational culture. The Bloor/Cognisco GDPR Awarenesses Tool can help an organisation monitor its progress towards a GDPR-aware culture but third party review and comment can offer additional material assistance.