

GDPR Implementation And Its Impact On Recruitment In SMEs In Ireland – Measures
Taken By Irish SMEs To Comply With GDPR In Recruiting Function

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Submitted to the National College of Ireland, August 2020

Submission of Thesis and Dissertation

National College of Ireland
Research Students Declaration Form
(Thesis/Author Declaration Form)

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Title of Thesis: GDPR implementation and its impact on recruitment in SMEs in Ireland- Measures taken by Irish SMEs to comply with GDPR in recruiting function

Date: 19-08-2020

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ABSTRACT

This paper reports the aftermath of GDPR implementation in small and medium-sized enterprises (SMEs) in Ireland, primarily within the recruiting function of HR. The paper summarizes the various policies and procedures that the SMEs incorporated into the recruiting criteria to be GDPR compliant. This work also throws light upon the easier, and harder approaches companies had to take, and the results of these policies from statistical data regarding the candidate inflow through applications. The paper discusses the extent to which GDPR affected the recruiting industry, and the changes made to be GDPR compliant by companies would exist if the law were to undergo amends shortly. The collection of research information is through semi-structured interviews with HR professionals working in Irish SMEs.

Keywords: GDPR, GDPR compliance, GDPR in recruiting, GDPR in SMEs, GDPR in an Irish context.

DECLARATION

I hereby certify that this material, which I submitted for assessment of the programme of study leading to the award of Master of Arts in Human Resource Management, titled “GDPR Implementation And Its Impact On Recruitment In SMEs In Ireland – Measures Taken By SMEs In Ireland To Comply With GDPR In Recruiting Function” is entirely my work and due acknowledgment have been given in the references made to all sources be they printed, electronic or personal.

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ACKNOWLEDGEMENT

Throughout the writing of this dissertation, I have received a great deal of support and assistance.

I would like to thank my supervisor Thomas McCabe, for all his guidance over the duration of this dissertation. The help and advice offered were invaluable in formulating the research and allowed me to complete the study to the best of my ability.

In addition, I would like to extend my thanks to my family for all their love and support they have given me over the past ten months. Finally, there are my friends and housemates who were of great support with their wise counsel and a sympathetic ear as well as providing a happy distraction to rest my mind outside of research.

TABLE OF CONTENTS

Abstract	i
Declaration	ii
Acknowledgment	iii
Table of Contents	iv
List of Figures	vii
1. Introduction	1
1.2 Context and Background	1
1.2.1 Technological Environment	2
1.2.2 Socio-Cultural Environment	2
1.2.3 Economic Environment	2
1.2.4 Political Environment	3
1.2.5 Legal Environment	4
1.2.6 Global Environment	4
2. Literature Review	6
2.2 Basic Concepts	6
2.2.1 Personal Data	6
2.2.2 Recruitment	6
2.2.3 Small to medium-sized Organisations SMEs	6
2.3 Evolution and Core Principles	7
2.3.1 Data Protection Laws in Ireland	7
2.3.2 Evolution of GDPR	7
2.3.3 Core Principles	8
2.3.4 Key Features	8
2.4 Human Resource. Data Collection and GDPR	9
2.4.1 Human Resource Management and Data Collection	9
2.4.2 Recruitment and Data Collection	10
2.4.3 GDPR and Recruitment	10
2.5 GDPR Implementation in SMEs	12
2.5.1 Preparation Guidelines for SMEs	12

2.5.2 Proposed Implementation Strategies.....	12
2.5.3 GDPR Compliance- A Headache for SMEs.....	13
2.5.4 Advantages and Disadvantages of GDPR Compliance for SMEs.....	14
2.6 GDPR Awareness.....	14
2.7 Conclusion.....	16
3. Research Question.....	17
3.2 Research Aims and Purpose of the Study.....	18
4. Research Methodology.....	20
4.2 Research Philosophy.....	20
4.3 Research Approach.....	21
4.4 Research Design.....	22
4.5 Data Collection.....	23
4.5.2 Sample and Sample Size.....	25
4.5.3 Sampling Method.....	25
4.5.4 Mode of Data Collection.....	25
4.6 Data Analysis.....	25
4.6.2 Thematic Analysis.....	26
4.6.3 Codes and Themes.....	26
5. Findings and Results.....	27
5.2 Themes.....	27
5.2.1 Adaptation.....	28
5.2.1.1 Consent Forms.....	28
5.2.1.2 Privacy Policy.....	28
5.2.1.3 Audits and Reviews.....	28
5.2.2 Implementation Phase.....	29
5.2.2.1 Training.....	30
5.2.2.2 GDPR Experts and Data Protection Officers.....	30
5.2.3 Challenges.....	31
5.2.3.1 Documentation.....	31
5.2.3.2 Additional Policies.....	31

5.2.4 Post-GDPR-Era.....	32
5.2.4.1 GDPR and its Effect on Internal Recruitment.....	32
5.2.4.2 Career Fairs, Campus Engagements, and No CV Policy.....	32
5.2.4.3 Number of Applications.....	33
5.2.5 Participant Perspective.....	34
6. Discussion.....	35
7. Conclusion.....	38
8. Recommendations and Limitations.....	40
8.1 Recommendations.....	40
8.2 Timeline for Implementation of Recommendations.....	41
8.3 Cost-Benefit Analysis.....	43
8.4 Limitations of the Study.....	45
8.5 Personal Learnings and Reflection.....	45
References.....	viii
Appendix 1.....	xv

LIST OF FIGURES

Figure 1: GDPR awareness among EU citizens

Figure 2: Country wise depiction of GDPR awareness

Figure 3: Process diagram of recommendations

Figure 4: Gantt chart showing the timeline of task implementation

CHAPTER -1

INTRODUCTION

It has been over two years since the General Data Protection Regulation (GDPR) has come into effect all over the EU, providing uniform regulations regarding personal data privacy protection with slight variations in every Member State. The GDPR came into force on 25th May 2018, an amendment of 1995 data protection directive after a two years transition period to follow up with regulations. GDPR is different from the previous data privacy regulations as it allows an employee to control their data in the desired manner and is considered extensively as a right to respect personal life, then as a factor of freedom and human liberty (Ogriseg, 2017). GDPR is essential in the fast-paced technological age, where a lot of data collection happens through the internet and multiple forums like LinkedIn and Indeed. Internet uses data including personal data for various purposes, including recruitment in organisations and is famous for the immediacy that it provides (David B.King, Norm O'Rourke, and Anita DeLongis, 2014). GDPR's short way from its implementation showcases the aftermath of this regulation on diverse levels affecting a plethora of factors, and many changes happened so far, even globally. GDPR affected global human resources as companies were to articulate strict policies, procedures, and strategies in the EU and at home countries to comply with the regulations (Harris, 2015) and was followed by other countries amending their data privacy regulation.

This research seeks to understand the several measures taken by SMEs to comply with GDPR when recruiting prospective candidates within an Irish context and explores the negative impression of GDPR on recruitment. The author examines the changes, policies, and procedures executed to be GDPR compliant while recruiting candidates. Previous researchers have guided organisations on how to follow and comply with GDPR when it comes to recruitment before the application of GDPR (Bika, 2019). Other studies emphasize the critical feature of consent formation to process data and harmful elements of losing independency when working with personal data and frequent reviews of documentations (Eclipse Software, 2017).

1.2 Context and Background

The GDPR brings implications on discrete factors of a business environment. The new law has consequences on the technological, political, legal, economic, and socio-cultural factors affecting business operation. The following section analyses the impression of GDPR on businesses, countries, and the EU.

1.2.1 Technological Environment

The GDPR came into practice in a time when the world's focussing on AI and technological advancements using big data. Multi-national organisations use their databases and access them from various parts of the world with a central system; this increases the risk of exposure of data to be stolen and utilised for illegal purposes (TILIUTE, 2019). The advanced measures in safekeeping the data calls for high costs. GDPR discourages companies headquartered elsewhere but has trade relations with EU member nations. Organisations that hold personal data of EU residents have to comply with GDPR regardless of the origin of the company. According to He Li, Lu Yu, and Wu He (2019), the impact of GDPR in global technological advancements is both considered as a challenge and opportunity for the tech companies. However, they mention that GDPR can adversely affect organisations by increasing the cost of the IT department through upgradations in technology and an increased workforce to take industrial actions that comply with GDPR (He Li et al., 2019). It is principally challenging as it increases overhead technical and labour costs while it can lead to competitive advantage by earning the trust of customers because of agreement with the law. He Li et al., (2019) correspondingly advises organisations to undergo internal assessments to check the status of their technical systems and architecture to seize the opportunity.

1.2.2 Socio-Cultural Environment

GDPR affects social researchers as it decapacitates many parts of social science research (Margaret Sleebloom Faulkner & James McMurray, 2018). Social science researchers often collect personal information of the samples' and observe without participant awareness to gain near accurate results. With the enactment of GDPR, the researchers and scholars of humanities have to undergo ethical reviews to check their compliance (Margaret Sleebloom Faulkner, James McMurray, 2018). Social enterprises collect personal data that are under the influence and have to focus more on their marketing and communication tools with consumers regarding the safety of the data (Ondrej Krocil, Richard Pospisil, 2020). This restricts the explorative education sector of the EU from discovering social theories. Socially, it also affects employment as it restricts small businesses from having relations within the EU, which is further discussed in the next section. The diversity in socio-cultural and economic conditions among the member states in the EU makes a one-size-fits-all law like GDPR difficult to launch evident from a similar study in Africa (Mannion, 2020).

1.2.3 Economic Environment

The degree of liberalisation and globalisation of countries influence the economy of a country. The trade relations between countries and the investments add up to the growth or downturn of an economy. Along with the global economy, the new digital economy in the world allows for cross border data flows, which, if not appropriately managed, can be a breach to the GDPR. The GDPR influences the EU economy and the universal digital economy adversely, creating trade disruptions. The US chamber's (ECIPE, 2013) analysis of the data protection laws' impact on the economy shows that the GDP (Gross Domestic Product) shrinks are directly proportional to the disturbances in trade, and GDPR induces shrinkage of 3.9 percent. While the GDPR affects the economy negatively, it causes a disturbance in the digital economy that thrives on personal data of consumers for target advertising.

The innovative economics in the digital market due to privacy regulation harms the revenue of companies that collect personal information of people (Darcy W E Allen, Alastair Berg, Chris Berg, and Jason Potts, 2018). While Guy Aridor, Yeon-Koo Che and Tobias Salz (2020) states this to be accurate, they add that users who agree to share their data have increased identifiability and are highly valued customers, which leads to better attributes in advertising. The increased identifiability, when used against the decreased data along with appropriate strategies, can ring in success (Guy Aridor et al., 2020). The economic implication of GDPR further affects through a decrease in foreign investments, deals, and ventures. A study by the Data Catalyst Institute (2020) depicts a reduction of 26.1 percent in the monthly EU deals with a 33.8 percent reduction in the amount raised per deal with an overall negative impact on investments.

1.2.4 Political Environment

The government in a country powers growth and development while improving the welfare of its citizens. The political stability and status of a country are imperative to the development of the nation so, is the government leading the nation. During elections, it is natural for the parties to gather personal information of the people to influence and predict the election results (Baker, 2019). The micro-targeting by parties using the personal information of citizens is evident in the Brexit referendum. Through GDPR execution, the political parties using the personal information for influencing people can be penalized up to 5 percent of their annual budget (Baker, 2019). GDPR in the political context assures the citizens of their information security and eradicates the doubt of being influenced to choose a people representative. With the

complexity of this GDPR compliance, the Irish Presidential elections were the primary election held in the EU.

1.2.5 Legal Environment

The GDPR itself is a complex law enacted in the EU but complemented by various data protection laws in each member state. While some nations have complimenting laws such as Ireland with DPA 2018, in some countries, the GDPR replaces laws that were in contrast with the regulation like the Italian Code Of Privacy (Ogriseq, 2017). The legal inferences of GDPR direct at guarding the privacy of the members in the country. The fines and the punishments for the breach of GDPR are stricter than previous regulations, and the Data Protection Agencies in each member nation overlooks the same. According to Rob Sobers (2020), the fines are lesser than expected previously, amounting to a total of 114 million dollars, of which 57 million dollars is that of Google. The data breaches count up to 89000, with 37 percent cases pending and 63 percent cases closed.

1.2.6 Global Environment

Further, the introduction of GDPR has advocated a global action for data privacy in other countries, including Brazil Lei Geral de Proteção de Dados (LGPD) and California Consumer Privacy Act (CCPA) (Brietbarth, 2019). The CCPA, even though it sounds parallel to GDPR, does not cover all aspects. The limitation of CCPA is its applicability to consumers and not employees and organisations making a revenue of more than 25 million dollars, operating in California, along with companies involved in collecting personal data (Cheryl L. Blount, Paul Bond, 2018). Whereas, another law IBPA (Illinois Biometric Privacy Act) restricts the collection of biometric information that came into effect following the GDPR in the EU. More countries globally are rooting for personal data privacy regulations in the wake of GDPR in the EU.

The global footprint of the regulation is not only visible through modifications in legal systems across nations but also in commerce. The companies that operate and have trade relations in the EU are affected by the GDPR. Most of the foreign SMEs operated in the EU shut down shortly after the implementation of GDPR. The budget restraint to upgrade to GDPR compliant technology and workforce remains the main reason for the downturn. The developing countries' companies shut down operating in EU markets due to extreme difficulty in complying with brand new GDPR due to the lack of similar laws in their country. The lower level of sophistication in the technical field and lesser supporting services in those countries

left the companies with no option other than to dismiss operation from the EU markets (Mannion, 2020). The speculation was that the Chinese and American companies operating in the EU expected to spend between 01 and 10 million dollars to be GDPR compliant and 9 percent more than 10 million dollars (He Li et al., 2019). Some noticeable alterations by companies owing to GDPR were the appointing of DPOs by Huawei while Youtube stopped serving third party advertising servers. Yeelight shut down its services to EU residents, although other organisations increased their investment in cybersecurity professionals and education and training (He Li et al., 2019). The consequences weigh more on the negative results rather than the positive side of the global spectrum on commerce.

The study intends to analyse the actual measures adopted by the organisations after the GDPR was implemented all over the EU on 25th May 2018 and the extent of negative impact on recruitment function in Irish SMEs. This research contributes to knowing how the recruitment scenario changed in Ireland due to GDPR introduction and can act as a base if the GDPR gets amended in the near future. The literature review discusses the knowledge gap in theory and the contradicting and similar views of previous researchers. The author intends to conduct this study with the help of HR professionals in Irish SMEs through in-depth semi-structured interviews led by the researcher. This paper then analyses the collected data from the HR professionals, whose direct link with recruitment in their respective organisations helps to make meaningful conclusions.

CHAPTER-2

LITERATURE REVIEW

This chapter discusses and critically assesses the literature behind different concepts such as data protection laws, privacy, personal data and processing of information, GDPR, online recruitment, recruitment and data collection, and application strategies of GDPR in SMEs. The theories concerning data protection and privacy begin with an explanation and origin of basic concepts, then trace the evolution of GDPR along with its core principles. The literature review also touches on the legal framework regarding personal data protection that existed in Ireland before the GDPR. It further examines the various proposed implementation strategies to adopt within the SMEs to comply with GDPR while critically analysing the pros and cons of the newly defined law. The literature review reflects lights on the data collected by HR as a whole and especially during recruitment and selection. It critically evaluates the recruitment scenario after the implementation of GDPR from various authors.

2.2 Basic Concepts

2.2.1 Personal Data

Personal data refers to any information regarding a living individual who can be identified from the data, including sensitive content such as age, gender, religious and political beliefs, ethnicity, and sexuality. The person whose information denotes to is the data subject as his data is held (Ticher, 2015) and the person who controls or access that information is the data controller. According to Goddard (2017), personal data correspondingly include online information that can identify a person such as IP addresses, cookies, digital fingerprinting, and even location data.

2.2.2 Recruitment

Recruitment refers to the attraction of prospective candidates at the right time for the right job. Recruitment involves the collection of personal data, which includes their name, address, contact details, and other personal information for processing. According to Ayling (2020) processing of the data mainly means obtaining, holding, retrieving, consulting, and using the data by carrying out any operations on it. The personal data is used for analysing if the candidate is the right one for the job and is stored for future references as well. SMEs consider recruitment as a crucial HR function that adds to the effectiveness and success of the organisation (Cucllari, Cini, and Gushi, 2014).

2.2.3 Small to medium-sized organisations SMEs

SMEs account for about 99 percent of businesses in the EU and creates around 85% of new jobs in the private sector, which is enormous (Wilkinson, 2018). Therefore, SMEs hold an enormous collection of structured and unstructured data. Organisation and employers must be careful while using, monitoring, and storing this data, that it is not misused, and that is where data protection comes in. Data protection laws protect individuals, from organisations mishandling their personal information (Ayling and Suff, 2018).

The next section of this literature review explores the data protection laws that existed in the Irish judiciary and other legal frameworks that complements the GDPR while tracing the origin of GDPR. It profoundly evaluates the central questions of why what, where, and how of the GDPR. The author does this by tracing the evolution and central principles surrounding GDPR.

2.3 Evolution and Core Principles

2.3.1 Data protection laws in Ireland

Under the Irish jurisdiction, privacy is an element and is enshrined into the Irish Constitution (Kearney, 2018). While Pinto (2018) has the same view, she advocates it more as a primary human right in the Irish context. In 1987 an Irish court recognised the right to privacy in the case of Kennedy v/s Ireland, “right to privacy must be formulated in a manner such that it ensures an individual’s dignity and freedom in a democratic and independent society.” Then in 2003, the Irish judiciary passed a new law called the European Convention on the Human Rights Act 2003 (Pinto, 2018). These laws were amended again in the year 2018. Data protection Act 2018 is often cited together as Data Protection Act 1988-2018, and these are the Data Protection Act, DPA 1988 (25/1988) Data Protection Act, DPA 2003 (6/2003), and Data Protection Act, DPA 2018 (7/2018) (Irish Statue Book-ISBN, n.d.). Three of these data protection laws combined to form the legal basis of data protection in Ireland (Kearney, 2018). Nevertheless, Pinto (2018) states that with the enactment of GDPR in the EU, it replaced two of the former laws i.e., DPA 1998 and DPA 2003, and is complemented by the 2018 Data Protection Act in Ireland.

2.3.2 Evolution of GDPR

The internet era made it easier for organisations to collect and store data on clouds and restricted individuals' rights to access or control and alter this information, which led the EU legislation to implement GDPR on 25th May 2018. Large amounts of data can be acquired and

analysed using technology at cheap rates leading the SMEs to accumulate more data than necessary, which further guides to the misuse of these data (Agarwal, 2016).

GDPR is an amendment of the 1998 Data Protection Act, and the principles primarily aim at preventing harm to individuals and secondly ensures at the fair treatment of the personal information Ticher (2015) whereas Ogriseq (2017) states that the primary GDPR Principle concerns to personal life and then as a factor of human freedom and liberty. The differences in the primary concerns of both Acts are visible, and the author perceives the latter because of the booming internet usage where personal information is easily collected and stored, whilst individuals are more concerned about their private life and privacy more than ever.

So the GDPR makes the data subject or the consumers the king of their data by assuring them various rights. According to Chorpash (2020), the GDPR differs in a way that involves multiple dimensions of data protection, limitations on data processing, transparency between the data controller and the data subject, notifications on data breach, data privacy rights, and finally the transfer of personal data outside the EU.

2.3.3 Core Principles

There are six core privacy principles to the GDPR, which include fairness and lawfulness, purpose limitation, data minimization, accuracy, storage limitation, and integrity. Nevertheless, confidentiality with the protection of personal data is at its center (Goddard, 2017). Regarding this Regulation (EU) 2016-679 and Menon (2019) state the various rights the consumers or employees have as data subjects in this context that revolve around the right to data access and rectification. The right to withdraw consent, erasure, right to be forgotten, and the right to object and lodge a complaint are also essential rights under GDPR Regulation (EU) 2016-679 and Chorpash (2020).

2.3.4 Key Features

The two key features of GDPR that make it diverse from all other previous regulations and maximises its intensity are the constant requirement of consents and the right to be forgotten. Goddard (2017) argues that the consent in GDPR should be freely given and have to be specific with explicit declarations backed by indication, while a higher standard of certifiable consent required to process sensitive personal data. Whereas, CIPD (2017) advises acting upon the consent with utmost transparency. Transparency by informing the data subjects behind the

purpose of personal data collection of the data subjects. Whereas Menon (2019) argues that the requirement of consent at all levels from the data subject can make the whole scenario more cumbersome, and consumers may lose interest.

Another key feature of GDPR is the right to be forgotten, which means an individual can ask the organisation that has its data to completely delete the information about the data subject Regulation (EU) 2016-679. Technology improvements and innovations seem contradictory to the right to be forgotten of the Article under GDPR as there is no point in these innovations if employees apply their right to be forgotten (Safari, 2017). This particular feature can, therefore, affect the technological developments in the EU that works on AI and cloud innovations.

The following section of this literature review explores the data collection and its relation to HR in an organisation and especially in the recruitment and selection function. It further explores the various kinds of personal data that HR collects and processes and its importance. The researcher presents and critically analyses the opinions and accounts of authors on the proposed change in HR scenario that GDPR brings in.

2.4 Human Resource, Data Collection and GDPR

2.4.1 Human Resources Management and Data Collection

Human resources in an organisation are responsible for the collection of personal information, also called personal data and the safekeeping of the same. Data can be both quantitative and qualitative, depending on if it is expressible in quantified terms. Remuneration rates, number of employees make up the quantitative part, and the record of training and development, skills, performance reviews make up qualitative data (Houghton, 2020). These data range from CV's and resumes to criminal records and policy violations. The personal information is collected and stored to improve the relationship between employees and the organisation (Ronkainen, 2018). Another purpose of safekeeping the personal data is to assess job vacancies or promotions in the organisation and to hire employees internally. The additional purpose of personal information of employees is for payroll, pension, perks and other benefits.

All the people or employee data has resulted in the new specialised area of people analytics. People analytics is the workforce data used to solve various business issues (Houghton, 2020). HR in an organisation deals with various processes that aim at managing people's resources. These progressions range from recruitment then through appraisals to compensation and exit

interviews (Ronkainen, 2018). HR collects sensitive data of the employees at various stages of its multiple functions, like the collection and storage of CV or resumes during the recruitment process. During the onboarding process, sensitive data such as criminal records, sexual, political, and ethnic orientations are collected. When it comes to evaluation of performance through appraisals, warnings, disciplinary notices, promotions, and performance reviews are considered sensitive. In compensation and benefits, the information about salary, bonuses, absence management data (Houghton, 2020) medical and health conditions and information under investigation about the employees is measured personal and sensitive. There is utmost care from the part of HR when collecting and storing these data (Ronkainen, 2018).

With the introduction of GDPR, organisations are responsible for facing the vital issue of storage and handling of personal data. For the same, TILIUTE (2019) advocates more security measures, especially pseudonymization, encryption, and anonymization, to accumulate and secure personal data in organisations. Whereas Room (2017) have similar views, he proposes to manage the risk by keeping frequent checks on the functionality. Blending the data protection principles to create a safe environment, recording the data life cycle, and being responsible are steps taken to be compliant with the new law (Room, 2017).

HR has the responsibility not only to safe keep this employee information but also to store it according to the national legislation or laws binding that particular country or geographical border. HR plays a huge role in an organisation by assessing what information about the employee is to be collected. Furthermore, what to be considered confidential and how to process that information under national laws. For that, HR needs to come up with various policies and procedures to handle employee data efficiently while adhering to national laws and regulations (Ronkainen, 2018).

2.4.2 Recruitment and Data Collection

Recruitment of employees includes minimal data collection, including CVs and resumes, and then stores it for future references and creates a talent pool that the organisation can easily access. This minimal data includes the personal information of the prospective candidates, and organisations convert it into HR files and stores it for a long time (Ronkainen, 2018). Organisations not only collect this personal information directly from the candidates applying to the vacancies but also through third parties like recruitment agencies or freelance recruiters (Wearelanded, 2018). Because of the high usage of the internet, recruitment has turned digital

or online. There are various sites, software, and applications that are used for applying to jobs and for professional networking. Personal information of the candidates is taken through these mediums like Glassdoor, LinkedIn, etc. Moreover, data is retained from the careers page of the company and talent pool of the organisation on their website where candidates submit their personal information. Signing up for these job boards and to LinkedIn and uploading their CVs, that individual is permitting the processing of their personal information (Farrell, 2018).

2.4.3 GDPR and Recruitment

Recruitment involves the collection and storage of personal data of the candidates, and GDPR restricts the usage, storage, transfer, and processing of personal data without the permission of the data subject. Because of this, the implementation of GDPR affects the recruitment process in a drastic way. With the enactment of GDPR, an employer has to issue a privacy notice when collecting the personal information of the candidate either through an agency, online, or directly (Wearelanded, 2018). If the candidate is applying through job boards or LinkedIn, they must ensure that the candidate knows who can access his/her personal information and on what dimensions. LinkedIn even introduced the option of 'career interests,' which allows individuals to notify various recruiters if they are looking for an opportunity (Farrell, 2018). Individuals can choose who sees their professional availability and personal information on LinkedIn while this is theorised as an effect of privacy regulations.

Another footprint of GDPR on recruitment is the need for consent from the data subjects for collecting, storing, and processing their personal or sensitive data. Under the GDPR, consent is one of the seven principles founded upon. Data subjects should also be made aware of the purpose and use of personal data and the operations done on the data (Ayling, 2020). According to Farrell (2018), consent should be given freely and expressly, demonstrated by affirmative action and not through silence or pre-ticked boxes. While Wearelanded (2018) agrees with the same, they recommend proper documentation of these consents crucial to be GDPR compliant, whereas Ayling (2020), suggests recording these data by dividing it into categories by the nature of the operations done on them. Ayling (2020) also suggests the updation of softwares and technology like ATS with boxes to tick for consent or permission to process the data from data subjects. Individuals will also have the right to alter this personal information and even erase the data and the right to withdraw the consent upon request to data controllers (Farrell, 2018).

Implementing GDPR in SMEs has its advantages and disadvantages, and in the upcoming section of this research, the author is shining light on the same. The strategies and procedures advocated by authors in a pre-GDPR era for the SMEs to be GDPR compliant are analysed. It also briefs about the advantages and disadvantages the SMEs have to endure while complying with the law.

2.5 GDPR Implementation in SMEs

2.5.1 Preparation Guidelines for SMEs

GDPR in the HR department applies to any data processing, which includes personal information of a person. The most common examples of data processing under Human Resource Management includes the storage of work contracts in soft copies or hard copies, CCTV recording, geolocation monitoring and the use of the internet, email or the use of various social media networking sites (Monica Florentina Calopereanu, Marian Suica, Alin Nicusor, 2019). SMEs have a higher burden of regulatory duty to comply with GDPR in comparison to large organisations due to financial constraints.

Wilkinson (2018) provides guidelines for SMEs to comply with GDPR, mainly through three steps. The author recommends starting with a gap analysis to find what areas are to have complied with GDPR and the current compliance status of the organisation, followed by data mapping. Wilkinson (2018) suggests an in-depth mapping of the existing processes, policies, and procedures as required by Article 30 of GDPR. The third step is to execute a scheme for change management, which bridges the gap to be fully obedient with GDPR. Gabriela, Cerasela, and Alina (2018) have similar views, including an audit of the data and analysis of current compliance status. In addition to this, they advise establishing security measures to safe keep and process the data and application of transparency policies all over the organisation (Gabriela *et al.*, 2018). When it comes explicitly to recruiting function, Monica *et al.* (2019) suggest eradication of personal data collected for recruitment as soon as the recruitment ends. The organisations that wish to keep the details for long have to attain candidate consent together with a legitimate reason and duration for which the company keeps the records.

2.5.2 Proposed implementation strategies

Preceding researches have shown how organisations can attain GDPR compliance by enacting multiple strategies. The research conducted by Almeida Teixeira, Mira da Silva, and Pereira (2019) includes a systematic literature review followed by planning, conduction, and reports

stating that the organisations can implement GDPR through adopting numerous protection policies and technical measures. In contrast, Menon (2019) suggests a more transparent process with justification provided for the particular data collection and secondly via creating excellent security for the information stored and processed along with acknowledging the right to access and rectification. The third stage, rendering to Menon (2019), is the acceptance and respecting the decision of data subjects to be forgotten if they wish to terminate the relationship.

Employing Data Protection Officers (DPO) for efficient application of GDPR was suggested by (Almeida Teixeira *et al.*, (2019). A DPO's first-hand role is to coordinate and oversee the implementation and to act as a link between the organisation and the law authority (Monica *et al.*, 2019). DPO's are also accountable for the creation and conduction of data protection impact assessment, called the DPIA (Chorpash, 2020). The organisation is responsible for giving adequate resources and independence to DPO's and cannot influence or dismiss them for doing their duties correctly (Ayling, 2020). Whereas, (Digitalize Me Now, n.d.) advocates those small and medium businesses with less than 250 employees are exempt from recruiting a DPO acknowledging their financial constraints under Article 30 of the GDPR. Human resource departments in the SMEs have a great deal in adhering to the regulations and made changes under the guidance of Data Protection Officers (Brietbarth, 2019) during the implementation phase.

2.5.3 GDPR compliance- A headache for SMEs?

The problems with the introduction of GDPR, which is a breakthrough in the legislation in the last 20 years (Goddard, 2017) are mainly three and revolves around the financial aspects. The estimation of the enactment, which includes the preparation and compliance of GDPR alone, accounts for about 7.8 billion euros. The opinion holds that the big organisations would not suffer as much as the smaller organisations and start-ups with minimal or no funds. The second issue with GDPR is technological redesigns. The GDPR does not keep up with the technology, especially blockchain algorithms, that are used extensively in organisations. The requirement of consent at every stage of web surfing makes users lose interest in the site and makes it more tedious (Goddard, 2017). The Information Commissioner's Office (ICO) provides a guide aimed at SMEs to have a better understanding of the GDPR (Ayling and Suff, 2018). The new requirement of GDPR also asks the data controllers to provide notification to the appropriate DPO within 72 hours of a data breach upon being aware of the same (Chorpash, 2020). Organisations will have to risk their goodwill, reputation, and even have to deal with potential

court persecutions upon ignorance (Ayling and Suff, 2018). SMEs proved with any breaches, have to pay 4% of their profits for the breach of the law (Digitalize Me Now, n.d.).

2.5.4 Advantages and disadvantages of GDPR compliance for SMEs

Every action has its advantages and disadvantages, and so does GDPR. GDPR's implementation in SMEs has opened up a debate on the pros and cons of its impact on SMEs. While Mortleman (2018), states the top side of the coin and focuses on how SMEs can benefit from GDPR compliant, Gabriela *et al.*, (2018) argues otherwise. The lack of awareness and directions from public institutions, lack of practical guides on implementation, and the budget constraints in SMEs are the hardships mentioned while implementing GDPR (Gabriela *et al.*, 2018). Whereas, Mortleman (2018) argues that the execution of GDPR and compliance is advantageous for SMEs. SMEs can scrap off 30-50 percent of the total data by eliminating duplicate and obsolete data, which does not serve any purpose for the organisation (Mortleman, 2018). Less data calls for lower IT costs, risks, and better marketing while Gabriela *et al.*, (2018) argue this leads to increasing consulting costs and employing DPO's for SMEs while considering the budget and financial constraints. According to Hoare (2018), SMEs in Ireland have spent more than 5000 euros on average getting ready for the GDPR, which shows a financial loss for the SMEs given the financial constraints. Being GDPR compliant can make SMEs more responsive, secure, efficient, and customer focussed (Mortleman, 2018).

2.6 GDPR Awareness

Organisations used to independently process, store and use personal data whenever, wherever, and however they wanted, but with the introduction of GDPR, this changed. Organisations now heavily rely upon data subjects for their permission to use their data. According to McCarthy (2019), data subjects or the customers and employees are aware of their data privacy rights and hold the companies responsible for the misuse of data more than ever. The European Commission reveals that there is an increase in general awareness among EU citizens about rights on data privacy rules. Special Eurobarometer in 2019 surveyed EU citizens on behalf of the European Commission to test the extent to which they are aware of the new law and rights. The upcoming figure shows the result of the survey.

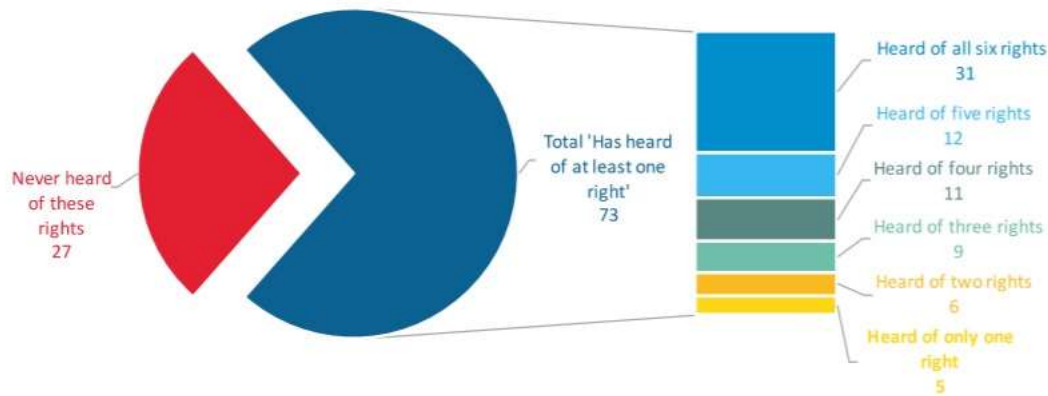


Fig. 1 GDPR awareness among EU citizens, Special Eurobarometer (2019)

The results showcase a whopping 73 percent of respondents to know about the rights that GDPR enshrines with them. The outcome depicts the underlying fact that people are attentive about privacy rights, which can harm the organisations that collect personal data of users. An exclusive survey by Special Eurobarometer (2019) points out that exactly half of the respondents from Ireland have heard about GDPR and are mindful of what it is. The figure below points out to the country-wise depiction GDPR knowledge among its citizens.

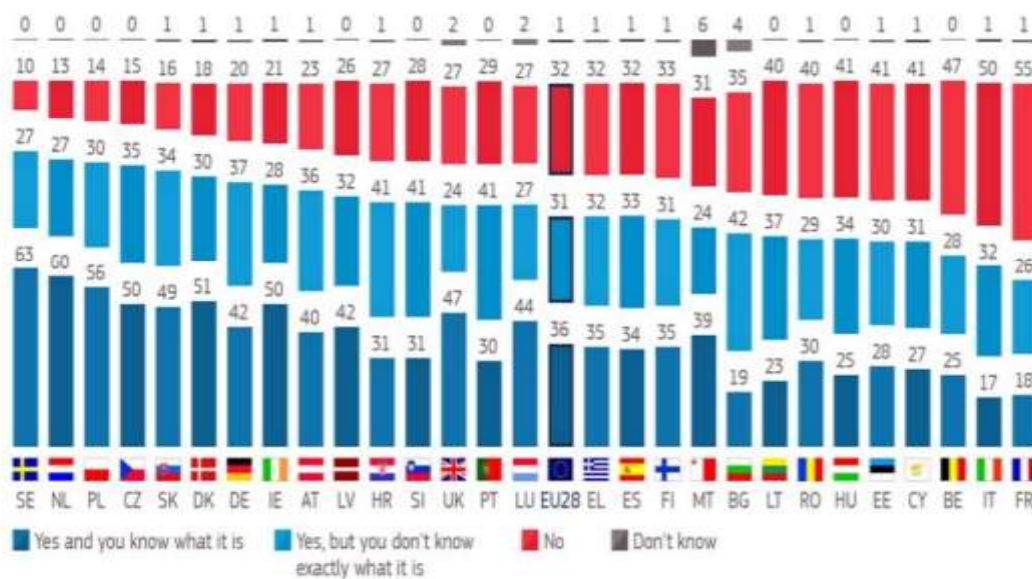


Fig. 2 Country wise depiction of GDPR awareness- Ireland 50 %, Special Eurobarometer(2019)

Though half of the respondents are aware of the GDPR, only 28 percent of Irish citizens are conscious of the public institutions and authorities accountable for data protection in the country (European Commission, 2019). The lack of knowledge resulted in campaigns by EC to encourage its citizens to check privacy policies and optimise privacy settings. Due to

extensive data subject rights and awareness on the topic, organisations are left with the option of tightening their data security. Planning out and finding what data to store and what to eliminate and how to ensure its security is something the organisation has to look after (Plassard, 2019).

2.7 Conclusion

Previous research and articles have provided SMEs with guidelines on GDPR application and how SMEs can take this opportunity to be more efficient and reduce costs while other authors have debated on how being GDPR compliant can increase costs for the organisation. Seldom research has been done post-GDPR time to know how SMEs became GDPR compliant. This research, therefore, intends to find out how SMEs in Ireland became GDPR compliant while explicitly focussing on the recruitment function.

CHAPTER -3

RESEARCH QUESTION

The literature considers the new law in a broader spectrum along with the views on how to implement and ensure GDPR compliance across organisations. A lot has been discussed and theorized about the changes organisations can incorporate and the possible aftereffects Mortleman (2018) and Chorpash (2020) of the GDPR compliance. Studies consider the influence GDPR can have on HR, especially in large organisations Plassard (2019) and the negative impact that can have on smaller organisations Eclipse Software (2017) in comparison. All the literature points out to the future, where the GDPR is in effect. Most of the research in the field to date took place in a pre-GDPR time with little focus on how it will affect SMEs in the post-GDPR time.

The problem here is the lack of knowledge on the actual changes implemented in the SMEs concerning recruitment to comply with the GDPR after GDPR came into force. The various steps taken by the management or by the HR in an organisation to comply with GDPR are vague to date. Previous researches Wilkinson (2018), Gabriela *et al.*, (2018) and Monica *et al.*, (2019) had shone a light on guidelines to be followed by organisations before GDPR came into force and includes suggestions and recommendations for human resource management and their compliance.

The knowledge gap in the literature is the lack of examination of the actual changes GDPR brought into recruitment function in SMEs in Ireland as it is one such area where the collection of personal data is required and stored for further queries and checks. It is vital to address the journey organisations undertook to attain GDPR compliance and the effect it has on organisations especially in SMEs. It is relevant to explore how SMEs overcame the pressure of complying with GDPR strictly within financial constraints and limited resources compared to large organisations and MNCs. SMEs cover a significant trade portion, with a total of 25 million SMEs operating in the European Union. In the European Union, the average value of SMEs' contribution to the economy is 56 percent; however, in the Republic of Ireland, this number comes down to 41.7 percent, making it below average (Clark, 2019). The journey of this negligible population of Irish SMEs with stricter data protection laws and huge fines on breaches of the GDPR and its effect on them remains unexplored. Therefore, the central question regarding this research is the impact of GDPR on the recruiting function of HR in SMEs within an Irish context.

3.2 Research Aims and Purpose of the Study

The purpose of this research is to find out the changes and new policies and procedures that SMEs adopt to recruit candidates while making sure the organisation complies with GDPR. The researcher chose to study the aftereffect of GDPR within an Irish context because of the comparatively strict data protection laws that existed in Ireland before the GDPR and complement GDPR to date DPA 2018 (7/2018) Irish Statute Book, ISB and Pinto(2018). Another reason to focus on the Irish SMEs is due to the negligible yet thriving population in a country dominated by power players and MNCs. The study is taking place in Dublin, Ireland, in the year 2020, 2 years into GDPR's implementation in the EU.

The data controllers, organisations in this context, are bound to register with the Data Protection Commission of Ireland (DPC), and the DPC report shows an additional 7143 entries in 2017 as the GDPR awareness spread (DPC, 2017). It was also evident from the DPC's reports that only 14 percent of the SME's in Ireland got ready for implementing changes to be compliant with GDPR (CIPD, 2017). The study intends to find answers for the following questions and fill the knowledge gap in the literature:

Overall research objective

What is the impact of GDPR on recruiting within SMEs in an Irish context?

Research Objective 1- What changes did the organisation (SMEs) implement to be compliant with GDPR while recruiting candidates?

Research objective 2- What policies and procedures were incorporated, which was different from previous policies that made the organisation more GDPR compliant?

Research objective 3 - What policies were easier/harder to implement?

Research objective 4 - Is there an increment or decrease in the number of applications received due to constant consent requirements?

Research objective 5- Did organisations recruit a GDPR expert to make sure the organisation is complying with GDPR?

Finding the answers to these research questions will allow the study to explore the changes and the journey of Irish SMEs in Ireland to GDPR compliance. The goal is to study the topic in-depth, how the Irish SMEs overcame the pressure of complying with GDPR with budget constraints and limited resources while competing with the larger companies in the industry. Alongside this, the research also hopes to understand how SMEs and recruiters would cope up with an amendment in GDPR law in the near future. Will an amendment lead the recruitment

process to be cumbersome and time-consuming or comfortable as the organisations are already compliant to the law and equipped to slight changes or variations in the future.

The next section explains the methods through which the answers to the questions are attained. The study requires data from the sample who knows the effects of GDPR inside-out. In order to explore the unexplored topics, the need for data from the HR professionals working in Irish SMEs through detailed interviews rather than single factual data is necessary. The section also covers the who, why, what, where, and how questions about the research methodology. The researcher also briefs about the analysis process to find results and conclusions.

CHAPTER-4

RESEARCH METHODOLOGY

The research follows a qualitative method, looking at various participants sharing their knowledge, views, and thoughts on the changes implemented in their respective organisations (SMEs) to comply with GDPR to recruit candidates. Qualitative research is concerned with experiences, and understanding these experiences is more important in the multi-dimensions of reality that flux over time rather than factual, single, agreed-upon outcome (Merriam and Grenier, 2019). The differentiation and uniqueness of HR in every organisation plays an enormous role in the success of the organisation, and it is impossible to measure in single word outcomes. This is especially true when it comes to the strategies an organisation adopts and leaves out, to be compliant with a law like the GDPR. The adopted procedures and strategies can make or break the organisation.

4.2 Research Philosophy

Research philosophy involves how knowledge acquisition happens. This means the particular belief and strategy behind data collection and its analysis used to conclude results. Research philosophy is heavily influenced by how the person perceives the world and data subjects. Research philosophy shows how the researcher acquires knowledge, and it depends on the nature of that particular kind (Mark Saunders, Philip Lewis, and Adrian Thornhill, 2009). According to Saunders *et al.*, (2009), the perspective of a researcher on the link between knowledge and its development influences the research philosophy.

In this research, interpretivism is the research philosophy that closely connects to the qualitative paradigm of research methodology. Interpretivism tries to understand general areas of study in a specific operation and opens up the conscious and unconscious explanations the data subjects have about the specific study (Lin, 1998). Interpretivism in this research is useful as the knowledge acquired is through communication to relevant data subjects in an in-depth manner to know about the changes that happened in their particular organisation to comply with a new law (GDPR). As noted by Saunders *et al.*,(2009), the social world of business and management is complicated to create specific laws or decisions based on factual data like in sciences. This broadly applies to this research area as Human Resource in itself is complex due to the connection with individuals who differ in every aspect. It is also a complicated area, as HR in every organisation is different and does not follow a one-size-fits-all strategy and procedures.

Interpretive research philosophy welcomes and trust ideologies rather than questioning them (Scotland, 2012). This research study involves gaining knowledge through in-depth communications involving data subjects, which directly differentiates the importance of doing a research study on people rather than objects, as emphasised by Saunders *et al.*, (2009). When studying HR in various companies and how they stack up with the updated laws, one needs to go deep in conversations with the HR personnel to get the relevant information. The author understands the subject and concerned areas from the individuals' perspective (Scotland, 2012) and intends to understand the research subjects without pre-conceived notions or bias.

4.3 Research Approach

A research approach is based on the research questions and how the researcher intends to gain the data required for the research (Pinto, 2018). The research approach is an integral part of the research methodology as it explains the mode of data collection and analysis of the data to make conclusions, in a specific detailed manner. It also helps to understand as to why that particular way is chosen to undertake the study (Johnston, 2014).

The main choices in this research study are deductive and inductive research approaches. An inductive research approach begins with an observation in the area of interest, which leads to a research question that was previously left unanswered either partially or entirely (Woichesyn and Daellenbach, 2018). The inductive approach is about the responses collected from the respondents, and this outcome of responses acts as a foundation for the analysis (Azungah, 2018). Whereas, the deductive research approach begins with a pre-existent theory to a specific area of study by revising the theory (Woichesyn and Daellenbach, 2018). When using both of these approaches, the data analysis will be different, respectively. According to Woichesyn and Daellenbach (2018), when using the deduction approach, as the name suggests, it deduces the existing theory to focus on something peculiar and specific while the induction approach observes and makes theories from the information to gauge on the broader or more general aspect. Whilst Azungah (2018) has similar views; he credits the formation and breakthrough of new theories to the inductive approach by exploring and answering unattended research questions while the deduction approach refines these theories.

In this research, the author intends to approach the study inductively with the help of the research question to explore the unanswered. The nature of the research question, data collection, and analysis lead to the choosing of an inductive approach. When having a question

about the strategies implemented in an organisation to comply with a law, it depends on organisation to organisation on the strategies they chose. Though the study concentrates on the organisational adaptations, it involves human subjects and requires comprehensive knowledge from the people associated with the area of study. Woichesyn and Daellenbach (2018) suggest it is ideal to select an inductive method while undertaking research on management or organisation and their working as this provides the readers with newfound knowledge exclusive to the organisations' insiders.

This research contributes to the creation of new theoretical knowledge that is previously unknown. For this reason, rigorous, detailed understanding and analysis of highly valued and attributed data (Struwig and Van Den Berg, 2017) that involve human experience and strategies are necessary. The inductive approach deems suitable to look at a small number of respondents, organisations' and their experiences with the organisational strategies and changes to comply with GDPR. The consideration for this as the most appropriate approach due to studying the pattern, the trends, forming concepts from the information providing new knowledge on the strategies implemented by the SMEs to comply with GDPR while recruiting candidates within an Irish context.

4.4 Research Design

Research design concerns with the type of methods and procedures a researcher adopt to gain the required data to solve the research problem. The research design framework, therefore, is about the type of method to be used to attain the relevant information (Sileyew, 2019). The choice of methods of research design is three; qualitative, quantitative, and mixed-method. The qualitative research methodology is concerned with the attainment of data or information by thoroughly studying the data subjects in their natural setting. This includes people doing any work together to accomplish new things in organisations (Gupta and Aswathy, 2015). According to Struwig and Van Den Berg (2017), qualitative kind of research will lead to the creation of new theory as opposed to revision and refinement of the theory, which happens in quantitative research. Quantitative research, on the other hand, is about filtering theory through factual or single data conclusions, usually figures, and scientific facts. Quantitative research, also according to Barnham (2015), is a product of years of scientific and statistical developments that discovers the solution through representations and are more valid and reliable due to the scientific and statistical analysis methods. Mixed methods, as the name suggests, is using a combination of both quantitative and qualitative techniques of research.

The usage of mixed methods in the social sciences research fields is vast due to its power of filling the space between existing theories through enhancement and simultaneous answering of how and why questions to the study (G.Headley and P.Clark, 2020).

In this study, the researcher adopts the qualitative research method to study the post-GDPR recruiting scenario in Irish SMEs. The HR procedures, operations, and HR strategies vary in organisations, as those could make or break the organisation. Due to this, it is nearly impossible to collect data and draw conclusions from figures and statistics. To find a solution for the research problem, the need to get down to profound conversation and understand the changes, strategies, and procedures each organisation went through to comply with GDPR, with all its duality, variations, and differences, is crucial. Qualitative research suits the study better because of the people concepts involved along with people in the organisations (Struwig and Van Den Berg, 2017) and the changes and adjustments they went through to comply with GDPR.

Further, the design of this research is narrative, as these narratives can tell us a lot about the changes in the organisation with a detailed insight (Cooke, 2018). The narrative research design acknowledges that HR in every organisation is diverse; the actions an organisation undertake to be compliant with the law are dissimilar and are meaningful in this context when every participant's perception is different. Historical data provides profundity in understanding the question at hand, and even the slightest of deviation can be positive by the creation of useful ideas, data, or an overall outcome (Golsteijn and Wright, 2013).

4.5 Data Collection

Data collection is about the various ways and methods through which the researcher can acquire relevant information to answer the research questions. Data collection in qualitative research studies are explorative and is attained through intense language data rather than exact numbers (Polkinghorne, 2005).

The various ways to collect the data essential to conduct this study are multi-fold. In qualitative research, the data often vital to conduct the study involves social settings and observation making it different from quantitative data. Qualitative researchers collect data through participant observation, focus groups, and interviews. The participant observation method usually involves observing the participant in his/her life over an extended period (Zahle, 2018).

The observation occurs in their usual social-personal setting while detecting and learning about them to conduct the study to solve research problems.

Another method researchers use to acquire the desirable data for the study is through focus groups. Focus groups are a set of four or more individuals with the same backgrounds and experiences who come together to discuss a particular topic. It is a setting where the participants' express their thoughts and views about that specific issue under pre-determined circumstances and guidance of a moderator who leads the discussion (David Wyatt Seal, 1998). The main advantage of conducting focus groups, according to Hopkins (2007) is the synergy created and the opportunity to combine other methods of qualitative research like participant observation. Focus groups similarly have some disadvantages as it is a one-off meeting and the pressure of participants to behave in a certain way that appeals to the social norms (Hopkins, 2007). It leads to participants faking their views or not being original while discussing the topic. At the same time, David Wyatt Seal (1998) argues that the presence of a moderator ruins the usual natural setting and can influence participants hugely to provide artificial ideas that can alter the outcome of the study.

The third type of data collection method is the interview method. Interviews for data collection is subdivided into three, structured, semi-structured, and unstructured interview. In structured interviews, the researcher prepares a set of interview questions related to the study and gain answers from the participants while leading and sticking to the pre-determined questions. While in the semi-structured interviews, the researcher asks pre-determined questions with diversions and variations to the participant. This technique of data collection allows the participant to express their concerns while responding to the questions (Zahle, 2018). While Zahle (2018) also explains that unstructured interviews resemble an ordinary conversation about the topic study due to the lack of pre-determined questions. The interviews are a combination of questions and participant observation. Interviews have turned online and telephonic due to the technological advancements rather than face-to-face. When the data collection is through interviews, the research question develops over time and can lead to other important issues that remain unanswered.

The upcoming section of the research briefly discusses how the author collects the required data. It explains over whom, how many of them, and the medium through which the data collection occurs.

4.5.2 Sample and Sample Size

The sample of this study is the employees working in SMEs in Ireland within the HR function. The interviewer has chosen a small set of sample size as the individual perspective and thought process of these interviewees is valuable than a broad set of sample size with single agreed-upon responses. The small sample size will provide in-depth, wide-ranging, reflexive, and flexible data (Crouch and McKenzie, 2006). When measuring the impact and aftereffects of GDPR in an organisation, it is essential to acquire flexible and extensive data; thus, the researcher chose a sample size of 10 HR professionals from Irish SMEs who can give detailed information about the effect and the actions taken to be compliant with GDPR. The identity of the samples' or the organisations they are working for is kept confidential due to ethical reasons.

4.5.3 Sampling Method

A mix of convenience and snowball sampling is chosen as the researcher has access to participants who work in the Human Resource department in various SMEs in Ireland. The intention is to contact the participants who are accessible to conduct interviews and then get recommendations for other participants to continue the research. Snowball sampling suits because of its link tracing techniques and takes advantage of the social networks of the respondent to provide a vast set of potential contacts (Atkinson and Flint, 2001).

4.5.4 Mode of Data Collection

The data collection for this research is through semi-structured interviews of participants. The semi-structured interview method is ideal as it can provide extensive, detailed knowledge about the area, and the interviewer can interfere with the interviewee to diverge from the current question to pursue another idea (P.Gill, K.Stewart, E.Treasure and B.Chadwick, 2008). A semi-structured interview method helps in knowing the participants' perspectives, and the organisations stand on GDPR the impact it caused. This aligns with the theory of Struwig and Van Den Berg (2017) that the information attained through semi-structured interviews provides a basis for issues that were previously unavailable. The researcher chose to do a telephonic semi-structured interview with the participants with a pre-prepared interview questionnaire while allowing the divergence and expansion of responses with independence for participants, even raising their concerns. The participant observation method is combined with the interview to record the emotions in the responses delivered by the participants.

4.6 Data Analysis

Data analysis in which conclusions are drawn and research questions answered with the use of collected information and data. The analysis of the collected information in qualitative research brings out exploratory research outcomes and makes the data more meaningful and valuable (Jessica Nina Lester, Yonjoo Cho, and Chad R. Lochmiller, 2020). The unit of analysis in this study is the changes implemented in the organisations to comply with GDPR while recruiting candidates. An additional unit is the degree of impact of those actions in the organisation regarding recruiting and HR.

4.6.2 Thematic Analysis

The thematic analysis interprets the data collected in themes from the semi-structured interviews with the samples. In the thematic analysis, the researcher tries to find layers of themes and tries to bind it all together to interpret the data (Cassell and Bishiop, 2019). When analysing data and drawing themes from the data, it gives tremendous flexibility and aids the researcher to add their perspective to supplement more meaning to the analysis (Lester *et al.*, 2020). Thematic analysis assists the researcher to have more elasticity with previous theory and help in drawing better conclusions.

Thematic analysis benefits to answer a wide variety of questions than getting answers to a subjective question with little information. During the process, themes that share similarities get grouped and stretches a sense of analytical study and are beneficial to analyse any set of sample sizes (Lester *et al.*, 2020). The leniency in the usage of theory and the nature of the research questions, which includes multiple dimensions about GDPR compliance in organisations makes thematic analysis best suited for this study.

4.6.3 Codes and Themes

The collected data or the secondary data in this research is analysed thematically with the help of themes and codes. The researcher gets acquainted with the collected data through reading and rereading it to find similarities and dissimilarities out of it. Codes are short words that describe the meaning of a category or analytical interest (Lester *et al.*, 2020). Coding aids to explore layers to the data collected and then connect those layers grouping accordingly. Categories form when one or more codes are grouped, which leads to the creation of themes. Themes are similar categories that benefit from understanding and explaining the data collected. The researcher intends to interpret these themes by creating meaningful statements out of the themes.

CHAPTER-5

FINDINGS AND RESULTS

This section of the study concerns the findings and results of research after the thematic analysis is done on the collected data. The data collected is from 10 HR professionals working in Irish SMEs through semi-structured interviews. Further, the author familiarised with the data acquired to infer codes from the data to group them into themes. The themes are the results arising out of the overall study and help in answering the research questions.

5.2 Themes

Themes are similar concepts or ideas that arise from the analysis of the collected data. The mutual points of reference through which the whole study connects are called themes (Mojtaba Vaismoradi, Sherril Snelgrove, 2019). These are also called categories that are grouped based on concepts, ideas, activities, or actions or from varying opinions. The author talks about the themes from the data collected, which is essential to solving the research problem through further discussion.

In this chapter of the research, the analysis of the data follows the grounds by (Virginia Braun, Victoria Clarke, 2006) as in their guidelines to thematic analysis. The analysis of data follows the techniques, as discussed previously, in sections of the data analysis. Rereading the collected data aided in finding codes before grouping similar concepts into themes. The themes are the indistinguishable findings that emerged from the study that provides the answers to the research questions.

The main themes that the author recognised from the collected data after careful analysis are:

Theme 1: Main changes incorporated in the Irish SMEs to comply with GDPR, titled Adaptation

Theme 2: Challenges in complying with GDPR, titled Challenges

Theme 3: Participant perspective, where the researcher identified the participant's perspective about various elements involved in the study.

Theme 4: Futuristic outlook, detecting the futuristic perspective looking exclusively at the amendments GDPR can have in the next few years.

5.2.1 Adaptation

The adaptation theme deals with the research objective concerning the different changes that the organisation incorporated to be GDPR compliant. Additionally, it concerns with change in the policies and procedures that were incorporated to comply with the previous data protection laws different from the GDPR. Organisations in Ireland had to integrate several changes with varying intensity to comply with the GDPR compliance. From the data collected, it was evident that the changes the SMEs had to inculcate when it came to recruitment function were similar.

5.2.1.1 Consent forms

The introduction of consent forms from the applicants during the application phase to collect and use the personal data of individuals stands as a drastic alteration incorporated. All the interviewees stated that their organisations ask for consent from the candidates to process and store their data. Participant 2 said, "Yes, the main change in recruiting is the consent form that the applicant has to read and decide on to agree or disagree" while participant 7 echoed that "the introduction of forms for consent was the first main step towards being GDPR compliant in the recruitment function." Participant 9, however, said, "the most visible or explicit change is the consent form that pops up when one applies to a job but includes others as well."

5.2.1.2 Privacy Policy

Privacy policies regarding personal data procurement, processing, and storage during the application stage and on further steps of the recruitment are another change that is second common among Ireland SMEs. Participant 1 quoted, "Yes, we have a privacy policy that is four paragraphs long with the company name and address and even stating that it is a private organisation." Participant 2 responded to the interview question stating that the privacy policy, along with the consent form, acts as the clause for the organisation to store and process the candidate data. The privacy policy, as explained by the interviewees, is a statement provided by the organisation which explains the purpose of personal data collection and the duration the data is stored. Privacy policies also include the name and address of the concerned organisation.

5.2.1.3 Audits and Reviews

To comply with GDPR, the organisations frequently review the privacy policies and hold regular audits to assure they destroy the personal data after one year of storage. From the data collected, it is evident that most of the SMEs were review their privacy policies every six months to one year. Participant 6 said, "audits in the organisation happens every month, which

is conducted by the HR team and annually by a team from headquarters.” Participant 10 responded similarly to that of participant 6, saying that “Our company holds the annual review while there are audits conducted by an outsourced HR company quarterly.” Whereas Participant 5 had a slightly different response stating that “the IT teams review privacy policies and such things bi-annually.”

Findings reveal the noticeable change in SMEs in the recruitment function is the introduction of the consent form, which pops up when an applicant applies to a job. The applicant can either agree or disagree with providing their consent. For HR professionals associated with recruitment, consent forms act as the backbone of GDPR compliance. The HR professionals cannot process, store, or use the applicant data without the consent of the applicant and are considered the utmost critical and a primarily explicit step towards GDPR compliance when it comes to recruiting.

Another discovery revealed that the privacy policy strengthens the consent form from the organisation's view by providing them with an extra layer of protection not to breach the GDPR. A privacy policy is a clause with the name and address of the organisation and includes details about the information collected. It also includes details about the processing of the data along with the duration for it is stored. Agreeing to this privacy policy by an applicant while applying for a job makes him fully aware of the consequences.

The GDPR causes recurrent audits and reviews of databases and files in the organisations. Most organisations conduct inspections and investigations of databases, data, and documents, privacy policies, cookies, and consent forms to check if they are all in accordance with GDPR or to check if any updation is needed. The majority of the organisations conduct these reviews and checks bi-annually, whereas others hold it annually. A small percentage of the organisations also have it quarterly to confirm and maintain GDPR compliance and to avoid fines.

5.2.2 Implementation Phase

The implementation phase of GDPR was for about one year in Ireland, wherein the organisations prepared everything to comply with the new law. The preparations in the SMEs were multidimensional. This theme explores the various procedures taken by the organisation or SMEs in Ireland to implement GDPR. While some organisations trained their employees, '

others hired a GDPR expert or Data Protection Officers, and while some organisations opted for a mixed method.

5.2.2.1 Training

Employees from some of the SMEs within Ireland provided training from their respective organisations. Participant 7 said, "Some employees from various departments were selected to undergo training on GDPR," while participant 10 said, "Yeah, there were brief training sessions for some of the employees, which included employees from the HR department as well." Participant 10 said, "I, along with my colleagues, attended training sessions at IBEC, which were useful."

5.2.2.2 GDPR expert and Data protection officers

A GDPR expert or data protection officer helps the organisation in securing their database regarding personal data of customers and employees. They ensure that the organisation is GDPR compliant. Participant 1 said, "No, our organisation did not hire a DPO or a GDPR expert." While participant 4 echoed the same while adding the reason behind it, "Nope, we received the required training and was confident that our team could single-handedly do it." Furthermore, participant 10 replied by saying that the financial constraint did not allow them to hire an expert and employees to receive training and decided to provide instructions rather than appointing a DPO or GDPR expert.

Findings associated with the implementation phase depicts that training, although in brief sessions were provided to employees in Irish SMEs. The employees selected from various departments, especially from Human resources and IT departments, underwent training in GDPR. Some of the employees from the SMEs in Ireland were given training in GDPR by the Irish Business and Employer's Confederation known as IBEC. Hiring an expert in GDPR in organisations or a data protection officer were suggested by the government during the implementation phase, but it is evident from the research that most of the organisations that are small-medium sized did not hire an expert or DPO during the implementation phase. The reasons, however, were different from organisation to organisation but the prominent ones were because of financial constraints and the confidence in the employees that they can do it with some training. This depicts that SMEs in Ireland were blindly following the suggestions from the government during the implementation phase of GDPR.

5.2.3 Challenges

To implement the new policies and procedures, the SMEs strategized and created an original path to comply with GDPR. The theme of challenges gives the results for the research objective of finding the problematic policies that were to be implemented in the organisations to attain GDPR compliance. As previously stated, even with changes like consent forms, privacy policies and audits, and reviews, challenges were evident while implementing these procedures. Some were easy to apply, and others were complicated as well as challenging to execute in organisations.

5.2.3.1 Documentation

Documentation in this context refers to the paperwork the organisations had to undergo, digitally, and manually in the organisation during the implementation phase. Participant 8 said, “ with GDPR came the challenge of paperwork, we had to review all the databases and documents that existed from the formation of the organisation and had to destroy everything which was against the rule.” Participant 4 responded with, “ Our company is 12 years old, and we had to go through every file to review to comply with”, while participant 9 said, “ yeah, a lot of documentation and checks when we were getting ready for GDPR, it was huge as we had to go through old documents while handling the present and new records we were receiving as applications.”

5.2.3.2 Additional policies

The SMEs in Ireland incorporated various policies to make sure their organisation complies with the GDPR. Additional procedures were introduced that complimented the GDPR compliance but were equally new in the organisation. Participant 5 said,” We implemented a few new policies recently which did not include GDPR as a major contributing factor but complimented it.” While Participant 1 had the same thought and said,” Some other procedures are incorporated, which acts as an additional protective shield to the GDPR compliance.” These new policies that tagged along with GDPR policies is another complexity.

The findings suggest that some policies and procedures were indeed problematic and challenging to execute rather than others. The responses from the interviewees depict that the documentation and new strategies that complimented the GDPR were most challenging. Most SMEs were 5-8 years old and went through a lot of paperwork and checks to inspect then destroy data stored for so long from the formation of the organisation. This extra step meant

longer hours to check and review the old documents as well as the present documents following GDPR. The introduction of new policies that were indirectly related to the GDPR but complimented the implications was tough to take it all in by the employees during the initial phase, not to mention the increased workload during that time.

5.2.4 Post-GDPR-Era

After the execution of the GDPR in organisations, changes happened, one needed a consent form from the applicant to process and store their data. This theme benefits to answer the research issues related to the extent of change in internal recruitment and change in the volume of applications after the GDPR compliance. The section also throws light on the effects of no CV policy on career fairs and campus engagements. The acceptance of CV from students during campus interactions and career fairs are scrapped out. The shift in internal and external recruitment, along with the difference in the number of applications received for job vacancies, could have altered because of the strict new formalities and procedures.

5.2.4.1 GDPR and its effect on internal recruitment

Because GDPR arrived with several restrictions and constant consent requirements from the part of the applicants, it might have lead to a change in the internal recruitment scenario. Participant 2 said, "No, there has been no change in the internal recruitment primarily due to GDPR" while participant 9 agreed there had been no impact on by adding, "Personal development and career progression are values of the organisation, the first preference always goes to our employees and its not because of the GDPR."

5.2.4.2 Career fairs, campus engagements, and no CV policy

When the companies go in to meet the young budding talent in colleges as part of campus engagements or career fairs, students and graduates can easily hand over their CVs to the respective companies. Nevertheless, with GDPR, students cannot pitch in their CVs anymore, and organisations are not in the position to take CV's from them as well. Participant 3 stated that there are no issues related to that, "Students can apply to the company they want via online applications, so GDPR does not affect that." Participant 5 said, "No, students understand the reason behind and are interested in engaging in conversation with us." While Participant 8 said, "No, I do not think we are missing out on great young talents because we do get a high volume of applications for graduate opportunities in the company even though we do not accept CVs during campus fairs or meetups."

5.2.4.3 Number of applications

After the GDPR came into force, there was an increase in restrictions, and this meant extra steps from the part of candidates applying for jobs. Many pop up boxes and dialogue boxes open up, asking the consent for applicants at every stage making the whole process cumbersome. Participant 10 said, "no, there has not been any change in the number of applications we receive for any job vacancy because of GDPR." While participant 5 said, "even though there has been no change in the quantity of the applications received; however, I feel the quality has increased." While most of the participants had similar responses, participant 6 said, "I am unsure about the increase or decrease because we just get the forwarded CV's from the recruiters (third party) that we have tie-ups with."

Findings depict the modifications and differences in the functioning of recruitment scenarios in a post GDPR era. The post GDPR era is the time that came after the implementation phase that started on the 25th of May 2018. The responses from the interviewees show that the GDPR has not affected internal recruitment. The change in internal recruitment, be it, positive or negative, has nothing to do with the new law and is solely based on values and career progression aspects of the organisation which varies from organisation to organisation.

Another area of research speculation is the volume of applications after the enactment of GDPR in Ireland. The researcher speculated the negative change in the sum of applications received for a job application due to the constant consent requirement needed while applying to jobs. However, according to responses received, it is understood that there is no adverse variation in the volume of applications received due to GDPR. The amount of applications remains unaffected, and SMEs still receive approximately the same amount of applications for a vacancy as earlier.

The no CV policy during the campus fairs or campus engagements by the organisations does not affect the recruitment of young professionals into the organisation in any way. Even though not taking CVs from the students and graduates like earlier periods, this does not affect the graduate programs or entry-level jobs in any way. Students and graduates engage with the organisation during campus fairs in quality conversations and apply to internships and graduate programs online.

5.2.5 Participant Perspective

The way the participant views and thinks about GDPR is also an element in understanding the intensity caused by GDPR in HR, especially in the recruiting function. The thematic analysis of the data collection benefits to answer the afterthoughts of GDPR implementation, specifically on future amendments in the law. The partaker's viewpoint in this particular scenario is taken into the study though it was not the main objective of the research study.

Many instances during the interview suggested that the participants have a broader perspective on the new law, even catering to a whole continent. Participant 1, when questioned about the no cv policy, stated GDPR has not had any effect on that but added by saying, "it improves the quality of conversation between the organisations and the students on the campus." Participant 4 said, "GDPR is essential, and everyone understands why that includes me as well." While participant 9 similarly had the view, however, added that "Even when I am applying to another job, I would not want my personal data to be stored or processed for a long time and used without my consent, and in that way GDPR is essential."

While conversing about the possibility of an amendment of GDPR in the near future, the participants opened up and revealed their views. Participant 8 said, "no, it won't cause many difficulties even with an amendment because we are used to it now." While participant 1 echoed a similar response, the respondent added that "if it gets amended anytime soon, I believe, it would be for the good of the people."

Findings portray that all the interviewees have a favorable view of the GDPR. This means that the interviewees have positive personal thoughts and opinions about GDPR even after going through many fluctuations to attain compliance in the workplace. Interviewees think it is vital to have a law regarding the processing, storage, and use of personal data, especially these days, when everything is easily accessible over the internet. The responses illustrate total support and acceptance of the new law as something essential to the present and for future generations.

The following section of the research concerns the link-up of findings of the study to existing literature available up-to-date. The discussion of findings and results, however, do not alter or manipulate them. The analysis strictly adheres to the current research literature available and shows the author drawing inferences with the results and findings of the study without interrupting them.

CHAPTER -6

DISCUSSION

This section of the study interprets the results and findings of the research and associates with the existing literature on GDPR and its implications on recruitment in Ireland and other European countries.

Similar to the literature of CIPD (2017) and Goddard (2017) the findings indicate that the critical feature of the GDPR that makes it different from previous laws and regulations regarding personal data protection is, in fact, the seeking of consent. The discoveries show that consent forms are not only an essential feature but the visible focal change after the application of GDPR in the organisations. Because most of the organisations recruit online, this is the first thing that an applicant witnesses when they visit the webpage asking them for consent to collect and process their data. All the SMEs in Ireland abide by this central feature, as evident from the results of the study.

The consent forms do not consist of an exhaustive record of the processing of the data, whereas privacy policies do. Results indicate that the organisations use privacy policies when recruiting candidates, which is a general clause stating how the organisation will use the data. Privacy policies backs up the literature as suggested by Ayling (2020) as organisations being transparent to the applicants in terms of how their data is used, stored, and the duration of storage. While literature advocates privacy policies for its transparency, in reality, organisations consider it as additional safety that compliments the consent forms that usually accompany job applications. It acts as an extra shield of security from the part of organisations to avoid the hefty financial fine if they breach the law.

Many individuals exercised the two key features of GDPR; right to rectification and right to be forgotten. Mentioned by Chorpash (2020) Farrell (2018) and Menon (2019) as the most significant way data subjects can have control over their data. The findings reflect that the data subjects exercise their right more than ever, especially after they leave an organisation.

When it comes to GDPR in SMEs in Ireland, organisations are cautious, which is visible from the outcomes of the study. The outcome points out that organisations use various protective measures from their part that includes consent forms, privacy policies, and frequent reviews to

be GDPR compliant precisely as suggested by Almeida Teixeira *et al.*, (2019). The technical measures consist of frequent reviews of cookie policies, databases, and updation of ATS, observable from the findings linkable to Almeida's literature on the issue.

While various authors like Almeida Teixeira *et.al.*, (2019) Ayling (2020) Chorpash (2020) Monica *et.al.*, (2019) recommends hiring a GDPR expert and a DPO as essential, findings, however, depicts it contradicting. SMEs in Ireland, as the results reveal, are not keen on hiring a DPO for GDPR implementation mostly because of budget and financial constraints. This issue of finance in Irish SMEs was previously mentioned by (Digitalize Me Now, n.d.) in their article. While SMEs in Ireland did not deploy DPOs, they trained their employees to be GDPR compliant. Outcomes disclose that SMEs in Ireland were positive about providing training to its selected employees and even partnered with IBEC for brief sessions. Though the main reason behind this is the financial restrictions, partial credit goes to the management's confidence in their employees.

When SMEs introduced GDPR in their organisations, some incorporated measures were comparatively more comfortable to follow while others gave a hard time to the organisations. In the initial phase of GDPR execution, organisations dealt with a lot of documentation and database management to erase data that were more than one year old to comply with GDPR. Mortleman (2018) advocated GDPR is efficient in helping organisations to erase unwanted data, which stands right from the findings excluding the extra workhours it demanded.

The results demonstrate the effect of GDPR on the recruitment function of HR in SMEs in Ireland. GDPR in recruitment came with multiple consent forms and privacy policies, which generated much doubt if it would make the applicants frustrated and give up on the application, as mentioned by Goddard (2017). In comparison, findings point out to instances where multiple consent forms make the application process time consuming and cumbersome similar to Goddard (2017) it does not have any effect on recruitment. The results imply no reduction in the volume of applications received by any organisation nor has any effect on internal recruitment due to GDPR. Internal recruitment is directly proportional to the values and career progression opportunities adhered to by the organisations. The fear of missing out on young talent due to restrictions caused by GDPR does not affect recruitment. The SMEs in Ireland has a positive outlook as they believe it encourages young people to have meaningful conversations and engagements with the organisations' representatives during career fairs.

Results reflect resemblance to the theories of Chorpash (2020), stating that GDPR differs and is stricter from the previous data protection laws and regulations. Employees and individuals are generously using the right to rectification and the right to be forgotten. These rights make GDPR more of human rights, as stated by Pinto (2018) and Ogriseq (2017), and people consider it vital.

The recurrent reviews and audits in the organisations portray the importance and strictness of the GDPR, as compared to other laws on data protection that existed in the country previously. The discoveries point out that the audits and reviews are new for the SMEs in Ireland, which shows how lightly the organisations thought of previous data protection policies. The results of the study describe how vigilant the organisations in Ireland are with handling the personal information of employees and applicants by incorporating additional policies that complement the GDPR centric policies and procedures.

In deduction, the study reveals that the GDPR restricts the organisations from processing, using, and storing personal information of applicants without their permission, including many others. However, this new law of data protection does not have a drastic change in the recruitment scenario in SMEs in Ireland. The volume of applications and the quality are the same as the pre-GDPR era, even though the process has become time-consuming and tiring due to multiple consent requirements and privacy policies.

CHAPTER-7

CONCLUSION

The European Union passed the law of GDPR 3 years ago while providing a gap of one year until its implementation in 2018 for organisations to adapt to the new rule all over Europe. The introduction of GDPR is to protect the right of privacy in this Internet era by restricting the access, usage, and storage of personal information by organisations and other people. The GDPR in Ireland updated the Data Protection Act 1988 and Data Protection Act 2003 and is complemented by the updated Data Protection Act 2018 under the Irish judiciary. The new law saw the organisations transforming its old, outdated personal data policies and procedures to brand new customer and employee-centered systems. The application of GDPR required modifications in policies and procedures regarding personal information in organisations. Many authors had previously stated how to go about with the changes providing insights for the implementation of GDPR compliance. The strategies, as suggested by various authors, include gap analysis, data mapping, and security measures, along with change management. The researcher studied this transformation journey of SMEs in Ireland while focussing on the talent hunting sector in organisations. The actual changes that SMEs incorporated in order to achieve GDPR compliance in Ireland and the challenges they faced until its execution and the effect of GDPR on various elements of recruiting are identified.

Organisations in Ireland exercised the one year gap before the GDPR enactment to its maximum potential. The study reveals that many of the changes that took place in the organisations were in line with implementation guidelines. The alignment with the ICO's GDPR implementation guide is not surprising given the legal implications and considerable fines in case of a GDPR breach. The specific and most visible change in the recruitment scenario in the organisations is the consent forms that ask the employees or potential candidates for consent in collecting, processing, and storing their data. The researcher finds this critical, especially in this fast-Internet based period where data can be accessed with ease; this makes the employee or an individual the controller of their data. The other changes were not explicitly visible to the outsiders, but the organisations and employees came across frequent reviews and audits to check in with GDPR compliance that continues. Some policies and procedures like the initial documentation were challenging, but the training sessions for some employees in the organisations and ICO's guide made the whole process easier for SMEs.

The SMEs in Ireland faced issues while implementing the GDPR compliant strategies as they were unable to use the available resources due to financial constraints. The government guides and strategies from authors during that time mentioned appointing DPO's and experts in GDPR to help the organisations with the initial phase, but as speculated, the SMEs did not avail of these methods due to financial constraints. Some of the SMEs in Ireland outsource HR, and thus these companies helped the SMEs during the implementation phase.

The function of recruitment was not affected much from GDPR as visible from the study, though the application process became longer with consent forms and privacy policies and restrictions on storing personal data of employees and candidates. The talent hunters in Ireland, however, has the sole opinion that they are not missing on talents due to GDPR. The professionals also believe that there has been no decrement in the volume of applications they receive, nor they find it challenging to acquire external talent. The study also points out how even the organisations are supporting GDPR, which shows their positive perception of the law and restrictions on the accessibility of personal data. The researcher thinks that this perception is mainly since these professionals, as individuals in their own life, want them to be the controller of their data.

The results depict most of the elements of the study to be aligned in the grounded theory while rejecting the hypothesis of the researcher that GDPR harms recruiting in Irish SMEs. It is mainly visible in the way the changes or transformations that happened in organisations in Ireland are the same as the authors suggested it in the literature. With little changes in practicality, most of the study shows resemblance to the application of theory ranging from implementation strategies from authors in a pre-GDPR period to guidelines from government bodies. Except for the changes inside an organisation, GDPR did not affect any element of recruitment in Ireland. The researcher finds this study contributing to the knowledge development of the post GDPR era and the transformation of organisations to comply with GDPR and how the recruitment scenario changed in Ireland due to GDPR.

CHAPTER 8

RECOMMENDATIONS AND LIMITATIONS

The upcoming part of the research provides a futuristic outlook and includes suggestions, a timeline for the execution of suggestions along with a cost-benefit analysis. It also includes the limitations and personal learnings arising out of the study, which is required by CIPD.

8.1 Recommendations

The recruitment scenario in Irish SMEs is not majorly affected with the introduction of GDPR. The results from the study depict the changes and the extent to which the law affected organisations. The recommendations are aimed at organisations and governments in the country while other instructions are aimed at future amendments of the law. While, further research is needed in the area of the global effects of GDPR, below are some recommendations from the author.

When a law is introduced in the country that affects companies, organisations and the government should ideally work together to make it a success. Accordingly, the execution was poorly done and maintained by the government with little help to the SMEs. The government can help the SMEs to attain GDPR compliance by providing them assistance through DPOs and GDPR experts. Since most of the SMEs have to work within a budget and struggle to hire GDPR experts and DPOs, the assistance from the government can work wonders and help with future amendments in the law.

The government in the country can also help the SMEs financially with some form of tax exemptions and subsidies to take the burden of stealth mode companies. In that way, the organisations can use finances for technology updations to comply with GDPR. The financial help from the government encourages start-ups and SMEs in a country and conceives more employment opportunities increasing the GDP and employment rate, boosting socio-economic factors in the long run.

Another proposal is to introduce courses in the field of data privacy and security in colleges as a primary subject. This helps to mainstream the data privacy and security as a core element of the right to life and freedom of expression. The introduction of GDPR- focussed courses with government accreditation helps the struggling SMEs to hire graduates and aids the government

with staffing issues in the field. With GDPR creating more global advocacy for personal data privacy regulations and adapting to GDPR, these professionals can be useful to other nations in their journey of data protection and regulations.

Introducing CPD (Continuous Personal Development) training and development in the Irish SMEs for the employees can support the organisations in adhering to GDPR compliance. The investment made in employees in the organisations helps to have a more capable and insightful workforce. Creating an internal talent pool in the area of GDPR helps an organisation to cut costs against external recruitment. SMEs can be self-sufficient with their workforce and do not have to opt for GDPR experts or DPOs from outside. Providing CPD to employees keeps them motivated and loyal to the organisation and can aid in the successful execution of GDPR amends in the future. The SMEs in Ireland can acquire GDPR compliance and maintain the same through technology updates and introduction of complementing policies. Organisations can automate the reviews and audits through technology developments and use more caution in the dealings with third party alliances and agencies.

Further, the organisations in EU or Ireland, along with the assistance of the government, can establish an association for professionals of data protection and privacy, like CIPD (Chartered Institute of Professional Development). The initiation of such a board can assist the professionals in gaining more knowledge through courses at discounted prices with the accreditation from the institute. The association can assist the SMEs and large organisations in the time of an amendment of GDPR. With the rise in work from home options and everything turning online, the pressing need for data privacy increases. The initiation of a professional body can assist organisations and the government in safekeeping the individuals' data.

8.2 Timeline for implementation of recommendations

The recommendations suggested can be executed promptly in Ireland with the help of the ruling government and organisations. The government only can directly initiate some of the suggestions to Ireland, such as relieving the SMEs with tax exemptions and subsidies and providing help with DPOs and GDPR experts. The ideal processing of the suggested recommendations is, as shown in the process diagram below.



Fig 3. Process diagram of recommendations

While this can be the ideal sequencing of processes, the start dates, and the approximate duration each step takes-up can range from weeks, months, and years. The approximate duration of execution of recommendation is based on current and past events of a similar nature. The suggestions and the duration is shown below in Fig 1.2 using a Gantt chart.

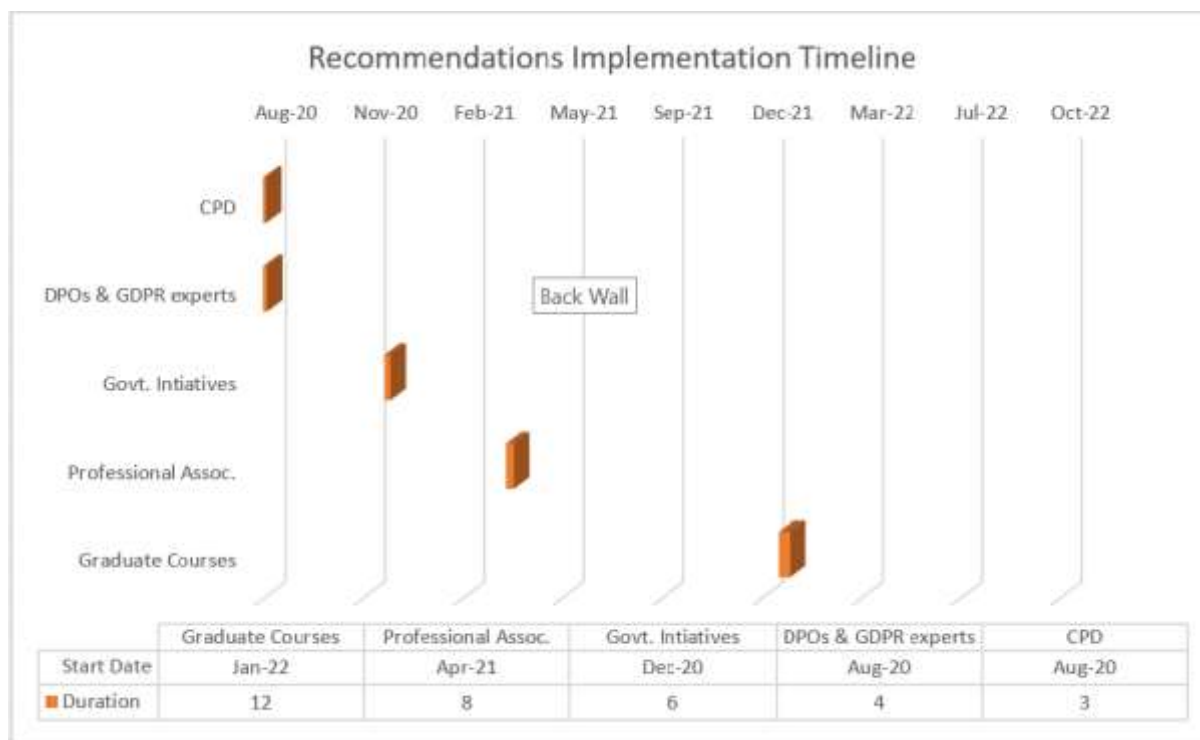


Fig. 4 Gantt chart showing the timeline of task implementation

The x-axis and y-axis depict recommendations and start dates, respectively. The duration of each task is calculated in months, and the five recommendations start from August of 2020, the first one being the introduction of CPD for employees by organisations. At the same time, the Government can also start with providing help to SMEs in the form of DPOs and GDPR experts with four months deadline. Following that, the government can initiate tax redemptions and

subsidies to SMEs and start-ups and encourage tech breakthroughs and developments. The initiation expects to be more time consuming and takes up to six months ending around May 2021. The introduction of a professional association starts in early April 2021, with the collaboration of GDPR professionals and government and expects to run throughout the year. The last recommendation in the timeline starts in 2022, the introduction of third-level courses in GDPR, which can help in the time of a GDPR amendment. To execute the last task, the new professional body and the government have to work hand in hand. With the right strategies, the course can be introduced in the curriculum at third-level institutions in the year 2023. While the introduction of GDPR courses is cumbersome and takes up the most time in the process, it can turn fruitful and cater to staff issues and create a talented pool of people resources.

8.3 Cost-Benefit Analysis

The cost-benefit analysis is a technique that uses the many costs involved in projects against the benefits of the project in the long run. It is a helpful economic method to make decisions or to choose a specific project from others. According to Rus (2020), cost-benefit analysis is a breakdown of a project's value to the economy and people related to the project, and he completely ignores the monetary element attributed to it. Therefore, in this section, the cost-benefit model analyses the value of the execution of the recommendations.

The various elements involved in finding the value of the project implementation are costs, benefits, and other considerations. The various recommendations the researcher put forward influence the inputs associated with this project. These involvements are mainly four and are labour costs, technical, educational, and straight out monetary values. The technical costs arise from the CPD programmes and from introducing GDPR as part of the curriculum in Irish universities. The expenses can be from something basic, like creating and maintaining the educational websites or via the online delivery of curriculums in Irish universities. The costs incurred from the educational aspects links with the CPD programmes and GDPR as a core subject in colleges due to the requirement of professors and educators. The monetary aspect is evident in all the recommendations but mainly from government initiatives though the costs are born by the government. This can mean less governmental budget for other welfare activities in the country. Furthermore, all suggestions involve the employment of people, be it for managing events, campaigns for government initiatives, or technical developments. Other implicit costs include the documentation, policy formulations, and time-period involved in the accomplishment of each task.

The benefits from the tasks are the creation of employment, smooth functioning of HR in organisations and possible economic and competitive advantages. Because there is a need for people in tasks and the need stays that way even after accomplishing the tasks, it rings in employment opportunities. The HR innovations through professional bodies and technological developments can make the process of recruitment easy, while government initiatives help take the burden of financial constraints from SMEs. Together with the initiatives from the government and through GDPR courses, Irish SMEs can attain self-sufficiency and efficiently function. This can further lead to economic advantage as the GDP increases with the growth of the SME sector in the country, not to mention the global advantage from outsourcing services in a time of global advocacy of privacy rights. Another benefit is on a personal level due to training and courses that enable the individual personal development and career progression opportunities along with a greater sense of awareness about their rights.

The cost-benefit analysis also reflects the many considerations related to the project, which in the context of the study are time, flexibility, and the risks involved. The uncertain and changing times with increment in online presence day by day affects the project. The COVID-19 pandemic accelerated the work from home and digital presence that positively aligns with the project apart from the uncertainty that the future holds. Amendments in GDPR and privacy rights, along with HR innovations and technological advancements like AI, reflects the flexibility of the project. While amendments in laws positively influences the project, innovations, and AI does otherwise. The most significant risk involved in this project is the uncertainty of the benefits and the future.

Over the period, the profits of the project can deteriorate but will not entirely go in vain. Most of the benefits can be reaped intact from the execution of the project. Any HR innovation or cutting edge technological development to tackle the issue can result in the depreciation of the advantages. Nevertheless, for Irish SMEs to update to those upheavals result in huge expenses and prolonged periods. The inaction of this project can result in losses from both organisational and national perspective. Organisations and Ireland can take the opportunity of increased global recommendations for data privacy and the improved online presence of individuals for growth. Not taking the steps can also harm in creating a compliance culture and can upsurge costs in the future. While the project takes another 2-3 years to be fruitful, it is in perfect alignment with the long term goals. It lowers the unemployment rates while accelerating the growth of

GDP and SMEs through self-sufficiency and possible outsourcing of services. The project is in perfect position with future amends, if any, accompanying satisfaction and trust of citizens with an outlook of the greater good for the general public.

8.4 Limitations of the study

Limitations are a few arising from personal issues and general drawbacks of the methodology used. The sample size of 10 participants is quite small to acquire accurate results to make generalised findings. The analysis of the collected data resulted in varied perspectives makes it more challenging to come to a single outcome conclusion for the research questions. The time constraint was also a factor in choosing the mono method of study with limited participants instead of selecting mixed methods for the study. The literature about GDPR is negligible, due to its newness, resulting in limited access to data affecting the initial phase of discovering the diverse perspective of authors. At the same time, COVID-19 pushed to change the mode of data collection to telephonic interviews while restricting the scope of observing the participants' reactions and body language

In contrast, the comprehensive conversations with the partakers helped in exploring the unexplored in a limited amount of time, though the compact sample size is considered a drawback for the generation of accurate results. While the time constraint drove to choose the mono method rather than mixed methods, it was essential to traverse through the topic and form a base as the grounded theory for further researches and studies. The various perspectives derived from the data collection, even though challenging to put together, makes sense when one realises that each organisation is different and has its values, systems, strategy, and culture. The significant and unexpected factor that obstructed the study was the change in the mode of data collection because of COVID-19. It reduced the possibility of spotting the reaction and body language of the participants, but it was essential to keep a safe distance and stay home due to complete lockdown in Ireland as advised by the government.

The limitations faced by the author can overcome in the future by accurately selecting the methods of the study in detail and looking into the existing literature. Further research on the topic with different sample sets from other counties in Ireland can help to determine the results accurately catering to a broader population. In that case, this study can form the basis of the future for integrated studies in the field.

8.5 Personal Learnings and Reflection

The nearly nine-month-long journey of reading, acquiring, and analysing data to contribute to the literature made me realise a few things about myself and the subject matter equally. The most meaningful aspect arose from continuous and extensive reading of the existing literature on the subject of GDPR. As an HRM student and someone who wants to develop a career in the same field, the knowledge base it provided is immense. The research embedded me with insights into the link between GDPR and HR functions in the organisations, and the influence a regulation can have on global business and legal systems. Critically analysing other literature made me think of the thought process of other authors and the different interpretations and ideas they have to offer. However, I realised that interpretation and ideas provided with evidence and linked back to the theory only could convince the readers. The initial phase of reading through literature got me in the habit of reading while commuting to college and work and has stuck with me since and makes my commute time more productive.

While COVID-19 affected my process of data collection, my most relevant experience resulted from the same. The mode of collection of data from samples changed from face-to-face interviews to telephonic interviews due to COVID-19. At first, the thought of the unexpected made me uncomfortable only to realise later that I am adaptable to changes and can work smoothly even in upheavals. The interviews helped me connect with like-minded professionals and widen my professional circle. As a result of telephonic interviews, my communication and networking skills improved, which is useful throughout my life.

I learned to create Gantt charts and other new elements while analysing and depicting the results of the study. Discussing the results made me understand the value of perceiving and interpreting ideas authentically against the pre-conceived notion of perceiving it right or wrong. It also made me keep an open mind while reading research papers with contradicting viewpoints and eliminate publication bias. The self-knowledge acquired from the final phases of the study and the rights of an individual with GDPR can prove useful in my personal life in the future.

The irony now is my curiosity in reading privacy policies and consent forms. During the study, I understood the extent to which personal data is collected and the degree of leakage of those data leaving an individual with zero privacy. Therefore, I started reading privacy policies and consent while applying to vacancies and while accessing websites. While the whole process of research went well, the only thing I would change if I had a chance is to change the method of

data collection. Instead of using qualitative methods, I prefer an approach of mixed methods. This is due to the hardship I faced while finding the sample (HR professionals working in Irish SMEs) and having meaningful conversations amid the pandemic. The mixed methods of research provide the opportunity of exploring the topic and verifying it using the quantitative spectrum. In mixed methods, the elements acquired from the explorative method can be used as a base or grounding theory to verify the correctness of the study further. Alternatively, the adversity was perhaps due to the pandemic hitting the country to shut down and pushing people to work from home and changing their routines and getting health check-ups and keeping well. The ten month long experience was exciting and productive with its upturns and downturns and I enjoyed exploring the particular topic.

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APPENDIX 1

Interview Questionnaire

1. What position do you currently hold in your organisation?
2. What is the size of your organisation?
3. Is your organisation an Equal Employees Opportunity employer?
4. Do you (your organisation) store personal or employee data outside of the European Economic Area (EEA Countries)
5. What main changes did the organisation had to go through to be GDPR compliant, according to you?
6. Do you (your organisation) store or transfer personal data to companies outside of your direct control?
7. How do you ask for consent to process or store personal or sensitive data- is it using a clause in the contract that is signed or by a separate consent form or a policy on the website during the application process.
8. How often do you review the following:
 - a) T&Cs specific to job applications
 - b) Privacy policies
 - c) Cookie policy
 - d) Terms of use of the website- candidate pool, 'vacancies,' and 'join us' pages.
 - e) Consent form allowing your company to process personal data
 - f) Any policy relating to the process of personal data for the third party.
9. Did your organisation hire a GDPR expert during the implementation phase?
10. Do you have a dedicated DPO?
11. Has anyone in your organisation received any kind of training on the GDPR?
12. What were the primary policies and procedures incorporated to make the recruiting function more GDPR compliant in your organisation?
13. Did you find implementing any one policy easier or more challenging?
14. Do you find it more difficult to find candidates for internships or graduate roles due to the 'no CV policy' during Graduate fairs and On-campus meets?
15. Do you think you are missing out on great talent because of the restriction on data collection and storage after the implementation of GDPR?

16. Do you have a privacy policy specially catering to the recruitment function? (with the name and address of your company and a statement that any data requested will be for recruitment purposes)
17. How long do you keep the data of the applicants or the candidates?
18. Have you used this stored personal data to recruit new people in that period?
19. Is there an increase or decrease in the number of applications received due to constant consent requirements during the recruitment and application phase.
20. Has internal recruitment increased or decreased after the implementation of GDPR?
21. The clause of 'right to be forgotten' from the GDPR, has anyone requested or exercised their power to be forgotten.
22. If there could be an amendment to the GDPR law in the near future, do you think it would be more challenging for the employers or the organisation to find talent or smoothly handle the function of recruitment?