

Innovative Approaches for Knowledge Transfer: A Case Study of PDPA Knowledge Transfer to SMEs in Thailand

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Abstract

Preparing for change is necessary for all organizations. Many organizations try to implement innovative approaches to transform their business in response to incurring challenges. Personal Data Privacy Act (PDPA), a privacy law in Thailand, has impacted to all organizations especially SMEs. To comply with the law, SMEs are required to change strategies, business processes and service.

This study presented an innovative free of charge project for transferring PDPA knowledge to SMEs in Thailand. It consisted of four phases: preparation phase, online-course training phase, intensive PDPA train-the-trainer (TTT) workshop phase and evaluation phase.

The results showed that managing project through collaboration with related partners helped distribute information to the target groups and persuade the right participants to join the project. The clear criteria for selection of participants to join TTT workshops helped to screen the right participants with strong intention and high potentials. An intensive TTT workshop provided by experienced trainers and gurus was also essential for transferring knowledge in depth to the learners or trainers at the end.

Keywords: Train-the-Trainer, Privacy law, PDPA, Knowledge transfer, SMEs

INTRODUCTION

The Personal Data Protection Act (PDPA) in Thailand sets out the rules for the collection, use, and disclosure of personal data by organizations operating in Thailand (PDPA, 2019). It's important for organizations in Thailand to understand their obligations under the PDPA and take steps to comply with this law to avoid potential legal risks. This may involve seeking legal advice, investing in data protection technologies, and training employees on the requirements of the PDPA.

Government organizations have central government agencies that supervise and follow up their organizational transformation. Large enterprises have experts or consultants and resources to support them to comply with PDPA whereas SMEs may not have such resources. Numbers of SMEs in Thailand are concerned about the impact of PDPA to their business in terms of compliance costs, changes of business processes/services and legal liability. Thus, transferring PDPA knowledge to SMEs is necessary for continuing their business.

Realizing the impacts of PDPA to Thai SMEs, a knowledge transfer project was initiated by the Digital Economy Promotion Agency (DEPA), a Thai Government Agency, in cooperation with other associations related to Thai SMEs. The project objectives were to assist SMEs in Thailand in complying with the PDPA by providing them the right information. With this regard, transferring PDPA knowledge to SMEs in Thailand with the right approach is important. The key outcome of the project was to develop 100 certified PDPA trainers under time and budget constraints.

LITERATURE REVIEW

SMEs in Thailand

Small and Medium Enterprises (SMEs) is used to define different types of small and medium business including manufacturing, service providing, wholesaling, retailing business and others. SMEs is a significant sector which drives the economy of the country in terms of employment and gross domestic product (GDP). SMEs contributes to the economy by creating jobs and providing product and service innovations. They also help to promote competition and innovation, which can lead to increased productivity and economic growth (Numprasertchai & Numprasertchai, 2013). SMEs plays a significant role in the economy of Thailand. The GDP of micro and SMEs in Thailand in 2021 was worth approximately 160,098,371,428 US dollars, accounting for 34.6% of national GDP (OSMEP, 2022).

A number of SMEs in Thailand have enhanced their own competitiveness using information system and tools for making better decisions and operations in their business processes (Kanyacome & Numprasertchai, 2019; Keedamrongkul & Numprasertchai, 2018). Thai government has implemented policies and programs aimed at supporting and promoting the growth of SMEs. These include providing access to financing and business development services, as well as promoting entrepreneurship and innovation through several government agencies and associations related to SMEs.

PDPA and its impacts to SMEs in Thailand

Thailand's Personal Data Protection Act (PDPA) is a Thai law published in the Government Gazette on 27 May 2019 and the enforcement started afterward in June 1, 2022 (PDPA, 2019). It regulates all companies operating in Thailand to protect privacy of its stakeholders. PDPA was designed to align with data protection standard based on General Data Privacy Regulation (GDPR) for personal data protection. The law was introduced to ensure the privacy and security of individuals' personal data, and to provide a framework for organizations to handle personal data in a responsible manner. It was applied to data processors and data controllers located within Thailand and provided guidelines to manage personal data in the data lifecycle. It is much stronger than the previous Bill, both in terms of its principles and its enforcement (Greenleaf & Suriyawongkul, 2019).

According to the PDPA, Thai SMEs are required to rethink and redesign their business processes which relate to personal data of their stakeholders both within and outside organizations. Identifying A privacy policy and notice must be developed and clearly communicated to each group of their stakeholders. A transparent process of managing personal data starting from collecting, analyzing, storing, and deleting data must be created and well implemented or it could be a risk of failure, not complying with the PDPA.

To respond and comply with the PDPA, many large enterprise and government organizations have assigned a specific team to study and implement their appropriate policy and process to respond to this regulation. However, SMEs facing the same challenge in compliance with the regulation, they have limited budget to invest in compliance measures such as implementing new processes and technology solutions. Most of Thai SMEs do not have their own experts or Data Protection Officers (DPO) to support them to comply their processes and documentations with the regulations. Accordingly, this new law could cause difficulty to SMEs. Referring to the work of Freitas and Silva (2018), it was concluded that given 10 SMEs in central region in Portugal lack of awareness of their obligations and duties in relation to Personal Data Protection, it is urgent to define a right approach to make them aware and be able to comply with GDPR.

Thai SMEs are taking risk of incurring penalties for non-compliance and problems related to the PDPA law. They doubt about how much they must spend time and resources on administrative tasks such as collecting, storing and updating data including reporting data breaches in compliance with the law. Realizing such a concern of Thai SMEs, the Digital Economy Promotion Agency (DEPA), a government agency under the Ministry of Commerce responsible for promoting and supporting Thai exports and foreign trade, found that the process of being compliant has helped Thai SMEs to improve their data management and security practices, which can be beneficial for the SMEs to reduce a non-compliance risk, gain trust from stakeholders, and sustain its business in the long run. Therefore, the project to provide necessary PDPA knowledge for SMEs was established and supported by DEPA and several Thai associations related to SMEs.

Knowledge Transfer through Online Learning and Train-the-Trainer (TTT) Methods

Knowledge transfer is the process of acquiring, sharing, and applying knowledge and information within an organization. There are several methods of knowledge transfer including formal training programs, mentoring, coaching, documentation sharing, communities of practice, and collaboration.

Online learning has become a new and/or improved version of distance learning (Benson,2002). An online learning is an educational program that is delivered over the internet and typically accessed through computer or mobile devices. It often includes multimedia content such as videos, readings, quizzes, and virtual interaction between instructors and learners. It is very popular based on convenience, flexibility, cost-effective and variety of contents. However, it has some limitation such as isolation, limited personal interaction and difficulty with hands-on subjects.

There are many free training programs for several purposes especially online programs conducted by academic and business organizations. Some of those program are free online courses available in several learning platforms. However, several problems were often found for a free online course, for example, participants' motivation and engagement, lack of time, low quality of training contents, limited interaction between trainers and trainees and insufficient support and resources (Khalil & Ebner, 2014). Wang and Baker (2015) presented that participants who completed the course were more interested in the course content, while those who dropped out perceived a massive open online courses (MOOCs) as a new learning experience. While Jia et al.,(2019) presented that only 7.14 percent of 4,049 registered social participants completed a 16-week Health Assessment MOOC on a Chinese MOOC platform. Therefore, the more effective free online program should be reviewed and redesigned.

A train-the-trainer program (TTT) is a type of professional development program that is designed to transfer knowledge to individuals for a particular subject or skill. It provides participants with tools and techniques they need to deliver effective training to others. Participants in this program can gain a deeper understanding of the subject matter they will be training others. It is frequently used in several sectors to disseminate knowledge and skills. Experts train curriculum content and the process of delivering the course to trainees, who are then in charge with transferring obtained knowledge to target groups. There are several types of knowledge transfer method in a TTT program such as mentoring, coaching, document and experience sharing and collaboration.

Rebecca et al., (2005) suggested that TTT is potentially a valuable tool, but it should be noted that there is no clear prescription for implementing it. Therefore, organizations and communities adopting TTT must be flexible and willing to revise the training plan as challenges emerge. Pearce et al., (2012) used a blended learning approach to deliver TTT programs combining different techniques such as interactive and multifaceted methods, accompanying with learning materials to distribute and implement guidelines and curricula to health and social care professionals.

The most effective knowledge transfer method depends on types of knowledge being transferred, audiences, and the available resources. Therefore, the integration of several types of knowledge transfer

methods may be better and more innovative to transfer PDPA knowledge to SMEs in Thailand without any training fee.

METHODOLOGY

In this study, the PDPA knowledge transfer for SMEs project called “PDPA Training Project for Business Sector” was designed and implemented from May 2022 to December 2022 to develop 100 certified PDPA trainers. This project was separated into 4 phases: 1) preparation phase, 2) online training phase, 3) intensive PDPA Train-The-Trainer workshop phase and 4) evaluation phase.

Obtained data in the first and second phase was collected through in-depth interviews and brainstorm with project manager and staffs, and online questionnaire survey. The data in the third phase was collected by one of PDPA trainers through observations. The last phase data were collected by using questionnaire survey and in-depth interviews with 4 certified trainers, PDPA gurus, project manager, and the chairman of Personal Data Protection Committee of Thailand (PDPC).

RESULTS AND DISCUSSION

The preparation phase

In this phase, several topics related to PDPA were identified and discussed for creating the appropriate learning curriculum. Experienced and well-known resource persons, who were keen in technological and legal aspects, from academic and business sectors were listed, selected, and invited as a knowledge provider for each topic. *“Famous and experienced lecturers can attract SMEs entrepreneurs feel interested in this project. They can provide interesting and necessary contents. While related partners will help us to persuade and select the right persons who are the target groups to join this project”,* explained by the project manager.

The project manager also commented that *“the more interested participants joined an online program the better opportunity to select the strong intention participants for the intensive TTT workshop. 30 percent of participants will be able to complete all topics on time, especially a free program”.*

Content and questions in each topic have been discussed, conducted, stored, and then published in the online training system. Six necessary PDPA topics were selected as a basic knowledge for training through the online course. The topics included “Fundamental of Personal Data Protection”, “PDPA Documentation Preparation”, “Data Flow Diagram (DFD)”, “Data Subject Request”, “PDPA for IT Management”, and “PDPA for SMEs”. All contents of each topic were published in the online training system sponsored by DEPA since June 17, 2022.

Important activities in this phase were to promote the project to the target groups and persuade the right participants to join the project. Several associations related to SMEs in Thailand were invited as project partners such as Thai SMEs Association, Thai Ecommerce Association, Thai Webmaster Association, ICDL and PDPA Thailand. Project partners helped to promote and persuade their members to join the project.

The announcement of free online PDPA training program was distributed to Thai SMEs through several media. 3,295 SMEs persons from country-wide registered to join the program to learn about basic knowledge of PDPA through the online program.

Online training phase

In this phase, all participants must complete and pass the examinations in 6 modules with scores above 75 percent before December 13, 2022. Only 1,010 from 3,295 participants completed 6 topics, passed the exam, and received the basic PDPA certificate. The overall scores for the online training program evaluated by the participants were 4.21 and 4.37 out of 5 for quality of online course system and the contents delivered by the trainers respectively.

Here are some feedbacks from the participants once they completed each module.

“There was a good and useful content in this program but I did not have enough time to learn all contents. I hope I can join this program again in the future”.

“Learning online is different from learning in a class. With interesting and necessary contents in each module, it encouraged me to spend time and pay attention to complete this program. I also registered to the TTT program for more understanding about PDPA.”

Intensive PDPA Train-The-Trainer workshop phase

Participants obtained the basic PDPA certificate could apply for 5-day intensive PDPA TTT workshops. These workshops were conducted between August – October 2022. Each workshop has limited the number of participants up to 30 persons.

There were only 126 participants were selected to join these 5-day intensive train-the-trainer workshops. All participants had to take a test and pass the digital skill standard exam of DCT ICDL PDPA. They had to learn, do assignments, and discuss with other participants and gurus in 5 days. All assignments were evaluated by gurus with useful feedbacks. Participants who passed this phase were promoted as a certified PDPA trainer.

The first intensive PDPA workshop was arranged in August 22-27, 2022. There were only 9 qualified participants joining this workshop. This was because there were very few participants completed an online PDPA course and passed all exams within 2 months after an online course had been publicized online. However, there were more participants, around 30, in the following intensive PDPA workshops.

Besides the defined activities during the workshop, there were also additional onsite and online activities originated by participants during the project period. For example, some PDPA gurus and participants were invited to join online communities to share information and discuss about PDPA and related topics since the first day of workshop, being a PDPA for SMEs community of practice.

The evaluation phase

There were 113 participants passed the standard DCT ICDL PDPA exam and received a PDPA trainer certificate. The results showed that 89.68 percent of selected participants can pass all conditions with high quality based on the selection and knowledge transfer methods that select only intentional and potential participants to join the workshops and worked closely with PDPA gurus during the workshop.

There were some comments and suggestions from the 4 participants with different background from various organizations; marketing manager, CEO, CIO, lawyer, etc., who were successfully promoted as PDPA certified trainers as the following.

“This was a high quality PDPA workshop. Not only interesting topics but also good and high experience trainers. They provided clear PDPA concept and good case studies in each part.”

“The obtained knowledge from this intensive PDPA workshop is beyond my expectation. This workshop helps me understand the concept of PDPA and how to comply with it.”

“This workshop provided both concept of PDPA and guidelines for managing data and necessary documentations. Now, I am confidence that I will be a good trainer.”

“This workshop is very good helping me understand the concept of PDPA. However, if it could provide longer than one day for each topic to practice in detail about ROPA and DPIA, it would be a perfect workshop.”

After completing the workshop, all new certified trainers were required to conduct their own PDPA training session of which the content was to be in related to their own business and provide an open PDPA training class with at least 20 audiences within 30 days after they completed the TTT workshop. All activities in training classes must be recorded and submitted to PDPA gurus for final evaluation of the quality of certified trainers.

One of the PDPA gurus who evaluated the quality of PDPA video conducted by new certified trainers suggested that *“Some participants just learned about PDPA at the first time but they can conduct a high quality training class and created interesting presentation slides. If they gain more training experiences, they will be good trainers”.*

The chairman of Personal Data Protection Committee of Thailand stated that *“this is a good project supporting the government by providing useful PDPA knowledge to SMEs and developing PDPA trainers.”*

The overall evaluation score of intensive TTT workshop was measured by 95 certified participants through online questionnaires. The results presented that the average score of quality of training contents and the training ability of experienced trainers/gurus were 4.75 and 4.73 out of 5 respectively.

CONCLUSION

The success of PDPA knowledge transfer project for SMEs was based on the following important things. Firstly, it is the project management through collaboration among key stakeholders and partners: DEPA,

several associations related to Thai SMEs, project organizing team for distributing training information to the target groups and persuading the right persons to join the project. Secondly, it is the selection of the right participants with intention and potential to join the intensive TTT workshop for promoting as a certified PDPA trainer. Thirdly, it is an interesting and high-quality contents of online program together with experienced trainers and gurus who conduct the sessions and workshops. Lastly, Motivating TTT workshop participants to pay more attention to PDPA details for achieving all conditions to be promoted as a certified PDPA trainer.

In summary, with innovative approaches of knowledge transfer this project delivered basic knowledge about PDPA to 1,110 persons and in-depth knowledge to certified 113 participants as PDPA trainers. It created accessible sources of PDPA knowledge to the public. Attractive and useful PDPA video clips related to SMEs in several business sectors conducted by these 113 certified trainers will be selected to be publicized afterward. This would enhance both speed and quality of PDPA knowledge transfer to SMEs locating scatteringly in Thailand.

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REFERENCES

- Benson, A. (2002) Using online learning to meet workforce demand: A case study of stakeholder influence. *Quarterly Review of Distance Education*, 3(4), 443-452
- Freitas, M. C. & M., Mira da Silva (2018). GDPR Compliance in SMEs: There is much to be done. *Journal of Information Systems Engineering & Management*, 3(4), 30-36.
- Greenleaf, G., & A. Suriyawongkul (2019). Thailand - Asia's Strong New Data Protection Law, 160 Privacy Laws and Business International Report 1, 3-6, Retrieved from <https://ssrn.com/abstract=3502671>
- Jia, M., D.Gong,J.Luo, J.Zhao,J.Zheng & K.Li (2019) Who can benefit more from massive open online courses? A prospective cohort study. *Nurse Education Today*,76, 96-102
- Khalil, H. & M.Ebner (2014). *MOOCs Completion Rates and Possible Methods to Improve Retention - A Literature Review*. World Conference on Educational Multimedia and Telecommunication (1236-1244). Chesapeake, VA: AACE.
- Kanyacome, S. & S. Numprasertchai (2019). *Information System Benefits Realization from Small and Medium Enterprises with Different Business Models*, 12nd the International Conference on e-Commerce, e-Administration, e-Society, e-Education, and e-Technology, Fukuoka, Japan, April 1-3, 2019
- Keedamrongkul,T. & S. Numprasertchai (2018) *Implementation of Tools for Increasing the Potential of SMEs in Travel Business Sector*, The 9th Engineering Science Technology and Architecture Conference 2018, KhonKhen, Thailand, September 7, 2018
- Numprasertchai, S. & H. Numprasertchai (2013), *Managing Knowledge to Enhance the Performance of the Grassroots Technological Innovation for Thai SMEs*, Technology Innovation and Industrial Management (TIIM 2013), Phuket, Thailand, May 29-31, 2013.
- Office of Small and Medium Enterprises Promotion (OSMEP) (2020). Executive Summary White paper on MSME 2020. Retrieved from https://www.sme.go.th/upload/mod_download/download-20201005123037.pdf

- Pearce, J., M.K. Mann, C. Jones, S.V. Buschbach, M., Olf, & J.I. Bisson (2012) The most effective way of delivering a Train-the-Trainers program: A systematic review. *Journal of Continuing Education in the Health Professions*, 32(3), 215-226.
- Personal Data Protection Act, B.E. 2562 (2019) Thai Government Gazette. No.136 Chapter 69 Gor. Retrieved from [https:// https://www.mdes.go.th](https://www.mdes.go.th)
- Rebecca, O.A., C. Joshua, C., Paul, W., Becky, J. Brenda & K. Howard. (2005) Train-the-trainer as an Educational Model in Public Health Preparedness. *Journal of Public Health management and Practice*, 11(6) 123-127
- Wang, Y. & R. Baker, (2015) Content or platform: Why do students complete MOOCs? *Journal of Online Learning and Teaching*, 11(1), 17-30.