

ID. Date of interview
date 10/02/20

ID. Time interview started
start 17:06:01

ID.end Completion date of interview
Date 10/02/20

ID.end Time interview ended
17:23:55

ID. Duration of interview
time 17.90

new case

ICO consultation on the draft right of access guidance

Q1 Does the draft guidance cover the relevant issues about the right of access?

Yes

No

Unsure / don't know

If no or unsure/don't know, what other issues would you like to be covered in it?

Q2 Does the draft guidance contain the right level of detail?

Yes

No

Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?

Yes

No

Unsure / don't know

If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

I think the area of requests about children particularly for school settings should have an example. Particularly in who the response should be returned to, should the child be asked if they want their parent to receive the information (or indeed if they concur with the parent's reasoning for asking for the information). There is lots of scope for confusion in this area especially for secondary schools where parents may disagree with school sanctions and submit a SAR that their child is not in agreement with in order to find information that does not exist or to be vexatious. This type of request is becoming more frequent.

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

None experienced

Q5 On a scale of 1-5 how useful is the draft guidance?

- | | | | | |
|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| 1 - Not at all useful | 2 – Slightly useful | 3 – Moderately useful | 4 – Very useful | 5 – Extremely useful |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Q6 Why have you given this score?

It is very detailed and covers all the areas that are required.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

- | | | | | |
|-----------------------|-----------------------|----------------------------|----------------------------------|-----------------------|
| Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

The guidance is extremely detailed and has many good examples. I would advocate a the release of a simplified version in parallel with this document which could include a flow chart or tick list for users and contain cross references into the relevant sections of the main document.

Q9 Are you answering as:

- An individual acting in a private capacity (eg someone providing their views as a member of the public)
- An individual acting in a professional capacity
- On behalf of an organisation
- Other

Please specify the name of your organisation:

What sector are you from:

Business and Industry

Q10 How did you find out about this survey?

- ICO Twitter account
- ICO Facebook account
- ICO LinkedIn account
- ICO website
- ICO newsletter
- ICO staff member
- Colleague
- Personal/work Twitter account
- Personal/work Facebook account
- Personal/work LinkedIn account
- Other

If other please specify: