

ID. Date of interview  
date 12/02/20

ID. Time interview started  
start 15:24:04

ID.end Completion date of interview  
Date 12/02/20

ID.end Time interview ended  
15:35:56

ID. Duration of interview  
time 11.87

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

P23 – How do we find and retrieve relevant information – this section is not clear in relation to deletion, archiving and backups and whether something is deleted or not. P25 states that something is deleted when you try to permanently discard it and have no intention of ever using it again but then the guidance suggests that an onerous search of archives, backup and deleted data should be carried out. It would be helpful if it set out a practical 'how to' approach on receipt of a SAR particularly around wide requests and in light of the guidance stating that you can ask for additional details to help locate the data.

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

If would be helpful if it contained some examples from Higher Education. Usually SARs are very wide and contain a mixture of information relating to 3rd parties and non-personal data.

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).

Aside from the sheer volume of an 'all of my personal data' request, they are complex in that the information often contains data relating to third parties, sensitive matters and where other exemptions may apply. Such requests are extremely time consuming and resource intensive. It is not helpful if, when we request it, that individuals do not have to give any additional information to help us to locate the information which would help speed up the process.

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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q6 Why have you given this score?

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 useful and welcomed but would be of more assistance if the points raised above could be clearer.

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:

Higher Education

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: