

ID. Date of interview
date 04/02/20

ID. Time interview started
start 09:01:55

ID.end Completion date of interview
Date 04/02/20

ID.end Time interview ended
10:29:34

ID. Duration of interview
time 87.65

Start of new case

Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

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).

Q5 On a scale of 1-5 how useful is the draft guidance?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 checked="" type="radio"/>	<input 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Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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Q8 Please provide any further comments or suggestions you may have about the draft guidance.

In the former code of practice, data processors "need not comply with the SAR" until the requester had provided clarifying information that was reasonably needed to find the personal data covered by the request - however, the new guidance states that asking for clarification does not affect the timescale for responding. We have serious concerns about this, as from our experience SARs are often complex and we frequently have cause to seek clarification from the data subject in order to provide a good service and supply them with the information that they need. Needing to respond within a shorter timescale places an unreasonable pressure upon data controllers - and we feel particularly those in the public sector that face high numbers of SARs and process considerable amounts of personal data with limited resources and capacity for these short timeframes. We would welcome an amendment that allows a reasonable period to seek clarification before the response must be fulfilled.

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:

Barnet Homes

What sector are you from:

Social housing

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: