

ID.	Date of interview
date	23/12/19
ID.	Time interview started
start	14:21:24
ID.end	Completion date of interview
Date	23/12/19
ID.end	Time interview ended
	14:34:12
ID.	Duration of interview
time	12.80

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

guidance in defining unfounded or excessive request is very broad. Also I think it will be good if they include more examples on complex requests and perhaps some guidance on Automation roadmap. ICO could clarify more in the guidance on what they mean by technical difficulties. I think (and I am only guessing here) what they really mean is when there are technical difficulties extracting the data – for whatever reason – and more time is needed to manually extract it. I don't think the example they have given - of data electronically archived -provides any clarity on what to take into account when there are technical difficulties

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

no it doesn't, more details about automation and technical matters is needed, for example if the system we are currently operating wasn't initially designed to automatically extract data in a report form that was intelligible to provide to the data subject, would we be expected to incur significant costs to rectify the technology, especially if there was no business benefit to it, just to answer a subject access request?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

more example is required particularly on complex cases, and more example to demonstrate how to extend

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).

in the context of social housing and social landlords, we have tenants who do various mutual exchanges of their properties throughout their length of tenure and those examples tend to take a lot of time specially of those tenants have been our residents for a long period time with complex health condition

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?

the guide not to be more detailed capturing controllers across all sectors (public, private, charities)

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

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

ICO should involve organisations in the process of issuing those guidance, as this will enable ICO to have a better understanding and an operational picture of the nature of the beast we deal with

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:

notting hill genesis housing group

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: