

ID. Date of interview
date 10/02/20

ID. Time interview started
start 10:10:42

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

ID.end Time interview ended
10:16:43

ID. Duration of interview
time 6.02

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

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).

An organisation employs 5000 plus member of staff. The President/Chief/Head submits a request for everything held about them. Every member of staff may hold information due to the high profile nature of the individual asking. To retrieve information would mean reviewing tens of thousands, possible hundreds of thousands of documents and emails that may have come back on a central search. To respond to the request could tie one or more individuals up for several months.

Q5 On a scale of 1-5 how useful is the draft guidance?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 type="radio"/>	<input checked="" type="radio"/>

Q6 Why have you given this score?
Good use of examples

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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 type="radio"/>	<input checked="" type="radio"/>

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

A concern I have is in relation to clarification and timescales. The guidance states that the start of the one month time period for compliance is no longer delayed until the controller receives any requested clarifying information from the data subject. This is a significant change from the previous guidance, which delayed the start of the time period for compliance until the receipt of any requested clarification. If the ICO does not change its position, controllers will still be able to ask the data subject for further information/clarification, but the clock will continue to run over this period.

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:

Swansea University

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: