

**From:** [REDACTED] (NHS SOUTH, CENTRAL AND WEST COMMISSIONING SUPPORT UNIT) [REDACTED]  
**Sent:** 06 February 2020 15:24  
**To:** SARguidance  
**Subject:** Consultation Feedback

External: This email originated outside the ICO.

Dear ICO,

I would like to provide feedback on the Right of Access guidance on behalf of SCW CSU.

P23 – states that organisations cannot ‘stop the clock’ whilst seeking further information from applicants as to the information they are requesting. This potentially conflicts with Recital 63 of the GDPR which states ‘where the controller processes a large quantity of information .... The controller should be able to request that, before the information is delivered, the data subject specify the information or processing activities to which the request relates.’

Also, if the request is unclear and you need further information as to the location of the data or where they were seen or if the request is not clear – it seems unfair and puts the controller at a disadvantage that the time will start ticking away.

Kind regards

[REDACTED]  
**NHS South, Central and West**

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