

ID. Date of interview
date 12/02/20

ID. Time interview started
start 17:22:12

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

ID.end Time interview ended
17:34:20

ID. Duration of interview
time 12.13

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

Needs to additionally include what is the obligation on the controller to explain the process and how visible must it be. ie not start with "when someone makes a SAR here is what you do to respond to it," but "Here is what you must as minimum explain to people how to make a SAR, and what is an acceptable process / route to access it in order to enable people (especially children) to be able to make a request in the first place." The barrier to understanding the process, sometimes by design, dissuades people from making the SAR and the authority can then say "we didn't get any requests, so clearly no one has any concerns about this". As a case study, see how difficult and obtuse the Department for Education SAR process is -- which does not work at all > <https://defenddigitalme.com/my-records-my-rights/>

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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Q5 On a scale of 1-5 how useful is the draft guidance?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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6 Why have you given this score?

There needs to be a 'children or education only' document. Schools struggle with this, and giving them only part of a large document will be too much. A targetted approach by audience will be much more useful and used. (for example they struggle to know whether or not to include or not include personal data about the child, exchanged in emails between teachers / school staff, especially when schools may -- in order to preserve anonymity should the email get missent or lost-- only use a child's initials in the email -- but if you need to look for every email that referred to [REDACTED] (OR) can be a very hard search to make -- what should schools be doing instead -- using a name, pseudonym, or number instead perhaps?)

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

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

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:

defend didgital me

What sector are you from:

civil society

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: