

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

It should be made clearer to the data subject they have no entitlement to full copies of documents solely the PII which maybe within the documents/systems. For example... and scenarios given for the private sector, not just financial/public sectors. We process a high number of SAR's and fundamentally data subjects expect a right to access all information not just personal information a private company may be processing or holding. No consideration is given to commercial sensitivity or risk to the business in providing all this information. Employee SAR's require further specific guidance many of which are used by third parties for fishing. If a SAR is made to seek information during a grievance, tribunal etc...confidentiality to other staff members named, whistleblowing, etc.. This guidance should be clear on what employment circumstances refusal maybe considered particually if it is clear the intention of the SAR is not for data protection purposes but to barter a settlement payment.

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

in general yes but there are still grey areas - See Q1

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

See Q1 for recommendations

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).

Repeat requests by Employees within the same month for non-data protection purposes to harass the employer The use of a SAR to preempt settlement negotiations particularly if facing redundancy - although exemptions may apply in certain circumstances Employees - the right of confidentiality, whistleblowing cases which may contain material about the data subject's actions against another Employee, such as bullying/harassment cases, this could harm to the individual making the claim against the Employee - this would prejudice the outcome of the case Thousands of emails, many repetitions and no scope, invasion of privacy rights of all - define what would be reasonably considered to be excessive - time worked for the private sector? If the Employee is under a live disciplinary for an alleged case of sexual harassment or has committed a crime

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 are still a lot of grey areas which require further clarity and could be open to incorrect interpretation by a data controller

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.

In-depth guidance about CCTV access, social media access, SMS and photo images

- 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:

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

Thank you for taking the time to complete the survey