

ID. Date of interview  
date 11/02/20

ID. Time interview started  
start 11:28:46

ID.end Completion date of interview  
Date 11/02/20

ID.end Time interview ended  
11:38:42

ID. Duration of interview  
time 9.93

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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

N/A

Q5 On a scale of 1-5 how useful is the draft guidance?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

Q6 Why have you given this score?

It's much more detailed than the current live guidance, particularly around complex, manifestly unfounded or excessive requests.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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Q8 Please provide any further comments or suggestions you may have about the draft guidance.

I do have to disagree with the new timescale of the SAR deadline. I do feel that, if an organization is requesting more information around what data the subject wants, or for any clarity about their request (excluding for identification purposes), the deadline should not be started. If we believe a request is excessive or manifestly unfounded, we would ask for this information to either prove or disprove our initial judgement. I believe it is entirely valid to hold on the deadline until this information has been confirmed by the data subject, especially if it is a data subject whom we hold a large amount of data for on a variety of systems. I do not believe this would greatly affect the data subject or their rights but would make it much more difficult for organizations to comply with the request. I feel as long as it is made clear by the organization that the deadline will not start until we have received all relevant information, this should be sufficient.

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:

What sector are you from:

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: