

ID. Date of interview
date 11/02/20

ID. Time interview started
start 18:17:39

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

ID.end Time interview ended
18:24:32

ID. Duration of interview
time 6.88

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

It would be useful to have more sector specific guidance and therefore sector related examples, but appreciate this isn't possible. Would certainly help to have more examples for Higher Education

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).

Repeated requests from a data subject, each time expanding or varying the scope of his request, sometimes by a period of a week or two only, sometimes relating to data held by a named individual or the whole institution. Often requests would have only the very slightest difference to previous requests with the change of a phrase or a word. His requests would run to 15 - 20 pages long. On occasion the DS would simply repeat the same request because he believed we had withheld data, and ignored the explanations of why certain information was exempt or redacted. Individuals felt harassed and bullied by his requests and his aggressive correspondence.

Q5 On a scale of 1-5 how useful is the draft guidance?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?

Good guidance on interpretation of the provisions with examples and practical information.

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

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

Nothing further to add

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:

Data Protection Officer in 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: