

ID. Date of interview
date 19/12/19

ID. Time interview started
start 16:42:27

ID.end Completion date of interview
Date 19/12/19

ID.end Time interview ended
16:54:22

ID. Duration of interview
time 11.92

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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Q5 On a scale of 1-5 how useful is the draft guidance?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

It's helpful to know the ICO's views on things. Even if it is just to confirm what you think the ICO will say when they update their guidance. But given the circumstances it really isn't that useful because professionals will have worked it out for themselves.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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Q8 Please provide any further comments or suggestions you may have about the draft guidance.

I disagree with this paragraph on page 4: "When responding to a subject access request (SAR), you must remember to supply this information in addition to a copy of the personal data itself." I do not see that the legislation requires you to proactively provide this without it being requested. I think this will lead to overcomplicated lengthy template responses being created when they're not really wanted. Most people when making a SAR, still just ask for a copy of the data, and many will be a bit bemused if they receive a list of this additional data. As you say, referring people to a privacy notice is sometimes going to be an option, but I think we should prepare to see some pretty spectacularly confusing responses from data controllers trying to follow this guidance to situations where the additional data doesn't apply very well.

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:

my views don't represent my organisation, they're hopelessly incompetent with data protection anyway

What sector are you from:

local government

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: