

ID. Date of interview
date 06/02/20

ID. Time interview started
start 10:00:55

ID.end Completion date of interview
Date 06/02/20

ID.end Time interview ended
10:16:11

ID. Duration of interview
time 15.27

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

There is no advice on redaction and how to properly respond to a request.

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

As above.

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

Need more realistic examples that public bodies face - our requests can be very complex and especially now that the ICO have changed their guidance regarding obtaining clarification.

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).

Excessive - getting the same requests or complainant slightly changing the request. Asking for the information in different formats - email and paper, asking for everything we hold - which could be 20 years worth of files, which by law we have to keep. Manifestly Unfounded - the current guidance still isn't clear to what this means and difficult to see where and how to apply this. There needs to be some training from the ICO regarding this - perhaps a video which can be posted on youtube. It would be useful if the ICO could provide some examples of the evidence you would require organisation to have in order to prove this - what evidence is acceptable. An ex-employee who has raised a grievance / whistleblowing and now making DSARs in order to get the organisation into trouble/make it difficult for us - perhaps only being done to get some sort of compensation.

Q5 On a scale of 1-5 how useful is the draft guidance?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

More guidance needed on redactions, the use of exemption and appropriate examples. Perhaps use the real life complaints the organisation receive.

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

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

It is too lengthy and does not apply to all organisation. It also not helpful that the ICO have changed the existing guidance regarding seeking clarification without any notice. Seeking clarification is required in our organisation as the request can be very vague - we cannot always confirm which department the request belongs too. This means that we have to email everyone in the organisation to see if they know them as the clock is ticking - but this could be wasting precious time. The guidance needs to change and go back to what it was before - we were always told that seeking clarification would mean the timescales would stop and now its suddenly changed. We have been given this advice for years and just last year from the ICO.

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:

Council

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: