

ID. Date of interview
date 11/02/20

ID. Time interview started
start 13:19:47

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

ID.end Time interview ended
13:22:02

ID. Duration of interview
time 2.25

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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 helpful if examples can be given per sector – for example in the education sector (schools) there are issues faced that are sector specific for example out of term time requests, parent requests on behalf of pupils, safeguarding etc.

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).

Parents of pupils at a school who ask for a copy of every record including every record and communication that refers to the pupil. Responding within a one month timeframe is incredibly difficult if a parent chooses to make their request at the start of a holiday period when the School will then be closed/out of term time. It would be very useful to have guidance on defining unfounded or excessive where the time period for responding to a request falls within a school holiday/out of term time period. The examples 'Applying an exemption that involves large volumes of particularly sensitive information' and 'Clarifying potential issues around disclosing information about a child to a legal guardian', are welcomed.

Q5 On a scale of 1-5 how useful is the draft guidance?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

This provides a lot more up to date relevant advice and helps advise on some of the issues our organisation has faced in the last couple of years.

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.

Sector specific examples on the website would also be helpful.

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:

Independent School

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: