| | |
|---|---|
| ID.date | Date of interview<br>11/02/20 |
| ID.start | Time interview started<br>15:37:52 |
| ID.endDate | Completion date of interview<br>11/02/20 |
| ID.end | Time interview ended<br>15:48:39 |
| ID.time | Duration of interview<br>10.78 |

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Q1 Does the draft guidance cover the relevant issues about the right of access?

- [x] 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Q2 Does the draft guidance contain the right level of detail?

- [x] 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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don’t know, please provide any examples that think should be included in the draft guidance.

there are generic examples yes but some specific relating to emerging technologies need to be covered - this will be the biggest area of growth of and need for data eg learning algorithms/artificial intelligence

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).

patient data requests to third party imaging providers who support nhs services should be covered in greater detail

Q5 On a scale of 1-5 how useful is the draft guidance?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

Q6 Why have you given this score?

covers most of what is needed without specifically providing more detailed guidance about how might either deliberately and formally apply for exemptions i think there should be restrictions on how subjects can make requests - people tweet such rubbish/trolling content, yet you really want a twitter based request to be valid (and considered in the same sphere as the other tweets, done in the same vein)? Better to insist on email if 'electronic' and ask organisations to show their contact details if they have online presence

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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 |
|---|---|---|---|---|
| ○ | ○ | ○ | ◉ | ○ |

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

too many externals links if one wants to reference some of the other related content in trying to cover ALL the bases, the document is overly lengthy and there are no generic response templates - which would have been useful and standardised requests and responses better

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:

healthcare nhs and non-nhs

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: