

ID. Date of interview
date 05/02/20

ID. Time interview started
start 16:21:40

ID.end Completion date of interview
Date 05/02/20

ID.end Time interview ended
17:10:52

ID. Duration of interview
time 49.20

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.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Q5 On a scale of 1-5 how useful is the draft guidance?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 covers most of the relevant parts of subject access request, including all the exemptions. For an inexperienced data protection professional it is clear and concise. More experienced professionals find that it does not cover the nuances of dealing with real people.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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Q8 Please provide any further comments or suggestions you may have about the draft guidance.

Can we clarify the request? (Page 23) If you process a large amount of information about an individual, you may ask them to specify the information or processing activities their request relates to before responding to the request. However, this does not affect the timescale for responding - you must still respond to their request within one month. Comment: This departs from current ICO guidance and presents practical challenges. Currently, the start of the time period to comply is delayed until receipt of any request for clarification. Under the draft guidance, the clock is still running whilst we wait for clarification from the requester. The time to respond has already been reduced to one month under GDPR (which is effectively anywhere between 28-30 days). If a requester then takes up to 10 days to respond, that would only leave 20 days to provide the requested personal data. This will be almost impossible, given the reason a controller will have asked for clarification in the first place, is because of the large volume of personal data we process. Do we have to respond to requests made via a third party online portal? (page 12) You are not obliged to take proactive steps to discover that a SAR has been made. Therefore, if

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:

London Metropolitan University

What sector are you from:

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: