

ID. Date of interview
date 20/01/20

ID. Time interview started
start 14:43:48

ID.end Completion date of interview
Date 20/01/20

ID.end Time interview ended
15:21:02

ID. Duration of interview
time 37.23

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

Definition of 'filing system'. It would be useful to have an example of a 'day book', diary or personal note book and whether this is a structured filing system. This is always questioned by line managers and would be easier to clarify if given as a specific example. What other exemptions are there? - include IR35 as example for 'the assessment or collection of a tax or duty or an imposition of a similar nature.'. This is extremely relevant to businesses and may not be considered as a matter of course - it's worth highlighting this by example.

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).

Employee has worked for engineering business for more than 40 years making a request for all their personal data. Despite repeated requests for that individual to set clearer parameters the persistent response 'I want all my data' received. This resulted in c100,000 documents to be reviewed and redacted. Based on this request being identified as 'excessive' made the decision to respond to the individual with all personal data held in HR files (paper and electronic) and other business documents covering a period of three years. Further to the decision no response from the individual.

Q5 On a scale of 1-5 how useful is the draft guidance?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

Information is relevant to the subject. It would be a 5 if the document was shorter (see comment below).

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.

'How should we supply information to the requester?' - suggest guidance includes 'It is your responsibility to check with the requester how they wish to receive the response and not assume that because the request was made electronically that they want the response via the same means'. Example: we received a request from a very senior director using their work e-mail. Knowing that other people have access to this e-mail account (a PA for example) means that it's important to check before automatically assuming it's agreeable for them to receive the response in the same way. For a non-business example they may have a coercive partner monitoring a personal e-mail account. General: This is a very long document. It would be fairly easy to separate public and private sector so solely commercial organisations can reference a shorter document that is far more relevant and public sector organisations do the same.

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:

ultra electronics

What sector are you from:

defence / civil manufacturing and engineering

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: