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Q1 Does the draft guidance cover the relevant issues about the right of access?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

The advice on SAR provision to third party requests is unclear for special category data (health) As a GP i am responsible for provision of health records. there are largely requested by solicitors looking for a free way to access notes and avoid AMRA. Patients rarely know what they are consenting to. The appropriate safeguard would be to provide the SAR direct to the subject- this would allow them to decide on the data they would like to share. They may not be fully aware of the data through a third party consent process. Your advice that a surgery 'may' provide direct to the third party ,means we have little course to decline and make sure the subject gets their info. Surely, after all a SAR is just that: A SUBJECT's access to their records

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

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Q3 Does the draft guidance contain enough examples?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If no or unsure/don’t know, please provide any examples that think should be included in the draft guidance.

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).

Repeat requests for medical records. or requests for medical records in cases of complex care- these can run to multiple ring binders full of information and use literally days of admin time to prepare.

Q5 On a scale of 1-5 how useful is the draft guidance?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

It is not specific enough for health records, especially as it places us at such high risk of legal challenge and high cost to small businesses (GP surgeries)

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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.

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:

Witley and Milford Medical Partnership

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

Thank you for taking the time to complete the survey