

ID. Date of interview
date 11/12/19

ID. Time interview started
start 09:18:33

ID.end Completion date of interview
Date 11/12/19

ID.end Time interview ended
09:34:21

ID. Duration of interview
time 15.80

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

The xamples are useful to assist in understanding the ICOs approach to situations

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).

We have experienced individuals who make serial requests, all slightly different, or which could have been dealt with in one or two requests but which they for what ever reason they prefer to swamp the organisation in requests for searches of multiple data sources and types over varying time frames. Whilst a lay person might consider these vexatious, the legal definition and fear of the ICOs sanction and or lack of support mean that a less than robust position. While quite rightly an individual's data rights have to be respected little support is given to Controllers in such situations.

Q5 On a scale of 1-5 how useful is the draft guidance?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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6 Why have you given this score?

Because I feel that the ICOs statutory position (for all of the right reasons) makes it one sided, which is why any guidance from it to clarify its position is so useful.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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

Clearer guidance and examples of when a Controller can stand up to requestors who are effectively nuisance requestor. For example we have received 10 related/linked SARs from the same individual on the same issue, all slightly different in a 6 month period. When is that an abuse or process?

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:

falmouth 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: