

ID. Date of interview
date 11/12/19

ID. Time interview started
start 09:09:42

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

ID.end Time interview ended
09:16:19

ID. Duration of interview
time 6.62

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

A lot of organisations use email to process personal data in a variety of ways; this can present a burden to an organisation where retention hasn't been well managed. I think a stronger statement around refusal where personal data is intrinsically linked to that of a 3rd party would be welcomed, as would some guidance on how to judge if a SAR is manifestly unfounded or excessive.

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

There could be more examples covering other sectors

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).

Repeating requests, chained requests and unfocused requests which are designed to be punitive rather than truly discover what personal data is processed by a data controller. The biggest cost in returning SARs is dealing with email; this can span years and involve a huge amount of personal data relating to 3rd parties, yet the expectation seems to be that this should be made available with redactions of 3rd party data. Several SARs my team has dealt with in the last 12 months have taken over 1000 person hours to complete.

Q5 On a scale of 1-5 how useful is the draft guidance?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

I feel it needs stronger guidance, more definite statements and further examples.

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.

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:

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: