

ID. Date of interview  
date 24/01/20

ID. Time interview started  
start 10:33:21

ID.end Completion date of interview  
Date 24/01/20

ID.end Time interview ended  
11:05:07

ID. Duration of interview  
time 31.77

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Q1 Does the draft guidance cover the relevant issues about the right of access?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

Would like to see tighter guidance on definition of "reasonable searches". What constitutes malicious, manifestly unfounded, excessive or unreasonable use of the right of access? Guidance on what to do with requests that require non-specific email searches and result in thousands of results. Currently having to manually check these. No software can tell one [REDACTED] from another without manual intervention. Volume seems to be played down in the guidance in favour of complexity. If we have to read through and redact hundreds of pages, the guidance could be more sympathetic to volume as a factor in extending past the calendar month.

Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Page12 - there are 2 types of Power of Attorney - guidance mentions one, but not the other. It's not clear whether one or both could be accepted for use on behalf of an individual. Page15 - can ICO elaborate on what requests could be processed under BAU rather than as SARs? Examples? Would like to see tighter guidance on definition of "reasonable searches". What constitutes malicious, manifestly unfounded, excessive or unreasonable use of the right of access?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

Links to relevant ICO case decisions from within the guidance document would make it easier to keep up with events and would perhaps minimise the need for fictional examples. For example, is it possible to tag a case decision document with relevant keywords and for a link per keyword be available at the relevant point in the document?

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).

Volume plays a large part, and the requester's unwillingness to specify what they do want. We can't ask them to limit their request. We have in the past had to process additional requests to the original where we know there is no further information.

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?

some of the guidance has been tightened up, but a lot of it is still general and could be read in different ways.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

P16 – “Calendar Month” with no acceptance of public holidays allows significantly fewer days for some requests than others, just specifically due to the date they came to us. For example, receipt at the start of October would allow for 31 days without any public holidays, but receipt in December would be 3 days shorter. In some cases, these public holidays have been the difference between compliance and not. Why aren’t public holidays taken into account? Wouldn’t just making it 20 working days and factoring in public holidays be easier and bring it into line with FOI? P55 – it would be good to get some specific guidance on personal information contained in routine weekly/ monthly management update reports that don’t focus on the individual and containing many dozens/hundreds of other people’s data. It's personal data with very little value to the requester.

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:

denbighshire county council

What sector are you from:

local authority

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: