

ID. Date of interview  
date 03/02/20

ID. Time interview started  
start 16:53:00

ID.end Completion date of interview  
Date 03/02/20

ID.end Time interview ended  
17:07:39

ID. Duration of interview  
time 14.65

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Q1 Does the draft guidance cover the relevant issues about the right of access?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Q2 Does the draft guidance contain the right level of detail?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If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?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If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

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).

Repeated requests with short periods between them - the requestor is either trying to tie up resources or doesn't believe that no data is held/ all data has been disclosed Requests that don't give any clue about in what capacity an organisation might hold information - eg councils that provide many services, it is hugely impractical to search every single service when the requestor is interested in care records or communications about highways, rights of way or boundaries.

Q5 On a scale of 1-5 how useful is the draft guidance?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

It's largely clear and explanatory

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?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Q8 Please provide any further comments or suggestions you may have about the draft guidance.

I have a significant issue in the assertion that the clock continues to run while waiting for clarification from a requestor. In many authorities there are a range of services that an individual could have engaged with, and it is rare for someone who says "give me everything" to mean actually everything. In the FE sector they probably don't mean every library loan they've had, but that would fall within the definition of "everything". Equally, a person who's interest is with social services probably doesn't actually also want emails about extra waste collections or parking if they say "everything". Sometimes there are assumptions that all data is held on one central location or on one system or database. This is very unlikely to be the case. It feels as though the block on suspending the clock while waiting for clarification is based on an assumption that requestors are both always clear in their requests and that all systems are easy to navigate and every individual will have had one entry point for one service and is uniquely identifiable. In my 10 years of experience I can tell you that this is rarely the case, if ever. Even relatively simple requests from former employees will have HR, pay and health and safety records as a minimum.

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:

The University of East Anglia

What sector are you from:

HE/FE

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: