

Why can't you just search emails?

When you make a Subject Access Request (SAR), it is important to understand that the University cannot run an automated search of all staff emails for references to you. **We must contact the relevant staff directly** and carry out **manual, targeted searches**. This is because of the following:

1. Automated searches only work well for structured systems

Automated searches work well in systems where people are consistently identified (e.g. full name, date of birth, ID number).

Emails do **not** use these identifiers. Email content is:

- unstructured
- conversational
- inconsistent in how people are referred to
- not categorised in a way that allows accurate automated searching

In emails, individuals may be mentioned by *first name, initials, or not named at all*, making automated searches ineffective.

2. Most email “mentions” are not personal data

Even where a name appears, it is not usually personal data. Routine work references (meetings, tasks, scheduling, updates) are not biographical or about an individual personally. Automated searches cannot distinguish between:

- genuine personal data
- routine, irrelevant internal communication

This produces thousands of false matches.

3. High risk of disclosing other people's personal data

A search using your full name would return little or no results, as this is not how people are referred to in everyday email communication. For this reason, any automated search would have to rely on first name only.

Searching by first name returns emails relating to **many different individuals**.

The SAR team cannot reliably determine which emails relate to you and which relate to someone else with the same name, meaning automated results carry **a very high risk** of releasing another person's personal data.

4. Excessive intrusion into staff email accounts

Automated searches would require broad access to staff inboxes, and as the search would be on first name only, this would result in the SAR team viewing large numbers of emails unnecessarily. These emails may contain:

- highly sensitive staff or student issues
- confidential HR matters
- private pastoral or welfare discussions

- legally privileged or complaint related information

Such access would be **disproportionate, intrusive, and inappropriate**.

5. Significant duplication makes automated results unmanageable

Email systems generate many duplicate messages through replies and forwards, as each message repeats all earlier content in the chain. When this duplication is combined with the issues above — first name matches, routine work references and emails about other people — the volume of irrelevant material increases dramatically. The result is an unmanageable set of automated returns that cannot be reviewed safely or proportionately.

Why searches must be limited and targeted

For these reasons, all email searches must be:

- **manual**
- **limited**
- **targeted**
- **proportionate**

Broad requests covering many years, large numbers of staff or undefined subject matter cannot be processed safely or in line with data protection requirements.

Legal basis

UK data protection law requires organisations to take **reasonable and proportionate steps** to locate personal data.

Whilst every request is considered on a case-by-case basis, the following types of requests will not normally be regarded as reasonable and proportionate:

- **Excessive in scope** – for example, requests that span very long time periods, cover multiple colleagues or departments, and have no clearly defined subject matter.
- **Speculative** – for example, “*Send me anything you hold about me from anywhere within the University*”. These requests require a search of all systems without any indication of what data is likely to exist.
- **Disproportionate** – requests that would require extensive searching, review or redaction that is out of proportion to the amount or relevance of personal data likely to be retrieved.

Requests of this nature place an unreasonable burden on University resources and undermine our ability to process other requests fairly and within statutory timescales.

These principles apply specifically to unstructured information such as email content.

What we need from you to process your request

Providing a focused scope helps us respond more quickly and accurately. Please include:

- **Who** or **which team** is likely to hold the information remembering, as above, that this must be reasonable and proportionate (we would not normally expect more than **five named staff**)
- **What** the communication relates to (subject matter / issue)
- **When** it occurred (a clear date range)

This enables us to carry out a safe, proportionate and effective manual search.