



**Date:** 09/10/2023  
**Our ref:** 01/FOI/23/011327/C

**FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/23/011327/C**

I write in connection with your request for information dated 14/09/2023, received by Greater Manchester Police (GMP) for the following information:

*Please can you disclose, preferably by PDF, any terms in contracts that exist with suppliers that store personal data of police officers or staff that require the suppliers to have measures to deal with or to try to prevent cyber attacks, other misuse of personal data or data breaches.*

**Result of Searches**

Greater Manchester Police (GMP) does not hold the information that you have requested in an easily retrievable format. To provide the data requested would involve a manual search of all contracts, tenders and purchase orders as the specific terms used will vary. The terms and conditions attached to each contract will vary according to the date the contract was issued, the means of procurement and the requirements.

Contracts that are tendered by GMP are subject to the Greater Manchester Combined Authority (GMCA) General Terms and Conditions for Goods and Services. Clause 1.1.33 contains the Data Protection provisions, specifically at sub-clauses 1.1.33.4 to 1.1.33.25. [A copy of the GMCA General Terms and Conditions for the provision of Goods and Services can be found on the GMP website.](#) These clauses were based on the Generic Standard GDPR Clauses that were published by Crown Commercial Services (CCS) in the Procurement Policy Note – Changes to Data Protection Legislation & General Data Protection Regulation Action Note PPN 02/18 published in May 2018. It is to be expected that CCS Frameworks all

incorporate very similar terms. Please refer to the standard [Joint Schedule 1 – Processing Data](#) that applies to most CCS Frameworks where personal data is being processed.

Although other frameworks will incorporate broadly similar data processing clauses, to go through all such contracts to identify and provide the relevant clauses from individual clauses will take over 18 hours. Therefore, to comply with the whole of your request the process would take over 18 hours' work which exceeds the appropriate limit of £450.00, the amount to which we are legally required to respond.

As per section 12(1) of the Freedom of Information Act 2000, the cost of providing you with the information is therefore above the amount to which we are legally required to respond i.e. the cost of locating and retrieving the information exceeds the 'appropriate level' as stated in the Freedom of Information (Fees and Appropriate Limit) Regulations 2004.

In accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice.

GMP is obligated, pursuant to section 16(1) of the Act to provide you with advice and assistance on refining your request to bring compliance within the fees limit. In order for the force to keep this within the fees limit, the information that you are requesting will need to be reduced to a specific type of procurement framework or a list of specific suppliers. The resulting response cannot be guaranteed at this point as it will be dependent upon the number of records that fall within the scope of any new request, as they would still have to be manually assessed.

Should you wish to refine and resubmit your request in line with the advice above please respond to [freedomofinformation@gmp.police.uk](mailto:freedomofinformation@gmp.police.uk)