

**Date:** 23<sup>rd</sup> September 2024  
**Our ref:** FOI/24/013261/E

**FREEDOM OF INFORMATION REQUEST REFERENCE NO: FOI/24/013261/E**

I write in connection with your request for information dated 13/09/2024, received by Greater Manchester Police (GMP) for the following information:

***Please disclose every incident reported to the force involving either 'Santa' or 'Santa Clause' for each of the following calendar years - 2022 / 2023 / 2024***

***For each incident, please disclose:***

***\* A full log of the incident, as recorded by your own force. Please redact any names or addresses that would prohibit disclosure***

**Result of Searches**

Following receipt of your request searches were conducted within Greater Manchester Police (GMP) to locate information relevant to your request. I can confirm that the information you have requested is held by GMP. However, I am not obliged to supply you with all the information as an exemption applies.

The Freedom of Information Act is a piece of legislation designed to give the public access to information held by public authorities. It exists to make the decisions of those authorities transparent and to keep the populace better informed regarding matters which affect them.

A Public Authority is able to refuse requests which can divert resources away from more deserving requests and other public business, or threaten to undermine the credibility of the freedom of information system. It is recognised that dealing with unreasonable requests can place a strain on resources and get in the way of delivering mainstream services.

When identifying potentially vexatious requests the indicators contained within the Information Commissioner's guidance on Section 14(1) should be considered. In this case we feel the following indicator applies specifically to question 3 of your request:

*Burden on the Authority*

Pursuant to the provisions of Section 14(1) of FOIA a request deemed as overly burdensome does not oblige GMP to comply with a request for information.

The ICO confirms within their guidance that they consider there to be a high threshold for refusing a request on such grounds if there is a viable case in line with the below recommendations:

- 1) The requester has asked for a substantial volume of information and
- 2) The authority has real concerns about potentially exempt information, which it will be able to substantiate if asked to do so by the ICO and
- 3) Any potentially exempt information cannot easily be isolated because it is scattered throughout the requested material.

As such **'a full log of the incidents'** is being refused due to the amount of time required to review and prepare the information for disclosure, which would impose a grossly oppressive burden on the organisation.

To provide the data requested would involve manual redactions to the incident logs of each incident as they do contain sensitive and personal information which could identify directly/indirectly a living human therefore Section 40(2) Personal Information will be engaged as this represents information that identifies a living individual, to disclose this information would breach the principles of the GDPR and the Data Protection Act 2018. Personal data is defined by Article 4 of the GDPR and Part 1 of the Data Protection Act 2018 and means any information relating to an identified or identifiable natural person ('data subject'). An identified natural person is one who can be identified directly or indirectly from that data.

The number of incidents recorded where the keywords 'Santa' and 'Santa Claus' is mentioned is 703 incidents. Therefore, at a very conservative estimate of 5 minutes to review and redact each incident description, it would take approximately 58.5 hours to ascertain the data required.

For this reason, any further requests of this nature will be refused under Section 14(1) of the Act, which states that requests that are considered to be vexatious do not have to be complied with.