



Date: 10/04/2025
Our ref: 01/FOI/25/014392/R

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/014392/R

I write in connection with your request for information dated 11/03/2025, received by Greater Manchester Police (GMP) for the following information:

*I would be grateful if you could please provide the following in relation to 37 of the 160 people arrested as part of Operation Navette, namely those whose order of arrest in this operation is a prime number (i.e. not the first, but the second, third and fifth, proceeding as follows & see below * for full details)*

(i) The total number who have had any reports of domestic abuse made against them

(ii) If possible within the time limit, please provide the nature of the offences for which these individuals have been reported

I trust allowing almost 30 minutes per person should allow this to fall within the allowed 18-hour time limit for requests, but if this needs to be refined further in order to be provided I am more than happy to consent to any refinement.

I note that this is a refined request in response to the previous request FOI/25/014292/O where a Section 40(2) – Personal Information exemption was applied.

Ahead of time, rather than at an internal review I would like to highlight that for this exemption to be engaged the ICO guidance states that a public body needs to make clear what the route to identification is. It is not sufficient to simply say as previously that "Although, the information requested is only statistical information this could be used to piece together details about individuals and could lead to identifying domestic violence perpetrators."

ICO guidance indicates that "when assessing if a disclosure could lead to people being identified, you need to think about how actual identification is possible. You should consider all the practical steps and all the means reasonably likely to be used by someone who is motivated to identify the people to whom the information relates to." Meaning that if data can be successfully anonymised to the extent that the public would not be able to identify the individual (even if the public authority could still identify them using other data in its possession), then the data is not subject to a Section 40 exemption and may be disclosed.

While you indicate "The media coverage includes press releases detailing individuals that were sentenced (especially at the start). These details include offender names and sometimes photographs." not all of those arrested have and there would be no way to link an anonymised figure to specific individuals in a way that would enable them to be identified. This would be the case if I asked for the figure for (i) to be broken down further by say age & nationality, but not for the overall figure.

Similarly, though odd no one other than the Greater Manchester Police knows the order in which individuals were arrested as part of Operation Navette meaning there is no way whatsoever for me (or any 'motivated intruder' when carrying out this test) to link any information provided about these 37 people to any of the individuals named in the media.

**{2 3 5 7 11 13 17 19 23 29 31 37 41 43 47 53 59 61 67 71 73 79 83 89 97 101 103 107 109 113 127 131 137 139 149 151 157}*

I also not your clarification, provided on 12/03/2025:

Thank you for your email, I'd like you to proceed with it and also ask you to note two aspects of my initial request:

*(i) The information requested is not just a smaller sample size, but a specific subset of the 160 that would be impossible for anyone external to GMP to identify from any public reporting. In response to **FOI/25/014292/O** you mentioned in particular the high level of media coverage of these arrests "especially at the start". Rather than requesting an internal review I have chosen to submit a refined request with an entirely new sample size to avoid the potential for identification that you have highlighted hence the reason for proceeding with a new request*

(ii) I copy and paste the ICO guidance again that indicates "when assessing if a disclosure could lead to people being identified, you need to think about how actual identification is possible. You should consider all the practical steps and all the means reasonably likely to be used by someone who is motivated to identify the people to whom the information relates to." You appear to have taken an automatic assumption that this would be the case for this FOI even before conducting any initial search, I would hope any response makes clear that you have followed the ICO guidance and fully employed the 'motivated intruder' test

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.

Following receipt of your request searches were conducted within Greater Manchester Police (GMP) to locate the requested information and I can confirm the information requested is held by GMP. However, I am not obliged to provide the information requested as exemptions apply.

The requested information is exempt by the following exemptions: **Section 40(2) Personal Information Section** and **38(1)(a)(b) Health and Safety** Section 40 is an absolute exemption with no requirement to complete a public interest test.

With Section 38 being a prejudice based, qualified exemption there is a requirement to articulate the harm that would be caused in disclosing or withholding information as well as carrying out the public interest test.

Harm

Any release of information under the Freedom of Information Act 2000 is a disclosure to the world, not just the individual making the request. When considering the disclosure or non-disclosure of information Greater Manchester Police must consider the harm that may be caused to the public, this includes the offenders and their family members.

Operation Navette is a high-profile operation which has featured within the media. The media coverage includes press releases detailing individuals that were sentenced (especially at the start). These details include offender names and sometimes photographs. Although, the information requested is only statistical information this could be used to piece together details about individuals and could lead to identifying domestic violence perpetrators. This could lead to a breach of personal data and would no doubt impact the physical and mental health of the perpetrators and their family members.

Factors favouring disclosure

There may be occasions when it is appropriate to disclose information that would have an impact on the health and safety of an individual or the public in general. In this case, I cannot identify any benefit to the wider public (in terms of health and safety) to disclose the statistical information which could lead to perpetrators being identified and then cause harm to those individuals. There are, however, more general arguments that must be considered such as openness and transparency.

Factors favouring non-disclosure

To disclose statistical information about the 37 of the offenders linked to Operation Navette and if there are reports of domestic violence against them has the potential risk of causing significant mental and physical harm not only to the perpetrators but to their family and friends. If the level of statistical data is too low or high this could lead to the individuals being identified in correlation with the information already in the public domain. Protecting the safety of the public is of paramount importance to Greater Manchester Police and information that would compromise the health and safety would not be disclosed within a response to a Freedom of Information request.

Balancing Test

When balancing the public interest Greater Manchester Police must consider whether the information should be released into the public domain. Arguments need to be weighed against each other. The most persuasive reason for disclosing the information would be openness. This needs to be weighed against the strongest reason for non-disclosure which is the concern of individuals being identified and their mental and physical health being put at risk.

Having considered all the factors for and against disclosure it is my belief that in this case, the reason against disclosure outweighs the reasons for disclosure and so the decision at this time is to maintain the above exemption and withhold the information from disclosure.