

Date: 08/04/2025
Our ref: 01/FOI/25/014502/F

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/014502/F

I write in connection with your request for information dated 31/03/2025, received by Greater Manchester Police (GMP) for the following information:

I am seeking information regarding the sharing of individuals' personal data by universities/university accommodation providers with the police in connection with protest activity, including (but not limited to) verbal or written statements, flyering, picketing, waving of banners, and encampments.

Please take a broad interpretation of protest activity, including where an individual could be said to fall under the scope of this request because of what the police or the university has considered to be wider misconduct/criminality related to their activism, such as criminal damage, rather than specifically their involvement in activism.

QUESTIONS

Please provide the following information:

(1) Copies of any and all Information Sharing Agreements between your force and universities or university accommodation providers within your police force area.

(2) If retrievable within the cost limit, the number of individuals whose personal data your force has requested and/or received from a UK university or university accommodation provider since 1 October 2023 under the terms of the ISAs disclosed in response to question 1.

(3) If retrievable within the cost limit, please break this down the figures disclosed in response to Q2 by:

A. The name of university or accommodation provider (eg Unite) the data was requested/received from B. The outcome of the data request, if police made one (eg provided / refused) C. The reason for sharing data, including, whether it was in connection with any protest activity the data subject was involved in (if so, please specify the type of cause eg Pro-Palestinian, Environmental, Animal Rights)

(4) Copies of any and all Community Impact Assessments (CIAs) conducted in relation to the policing of pro-Palestinian protests events in your police force area since 1 October 2023, as well as any overarching CIAs.*

(5) Copies of any and all Equality Impact Assessments conducted in relation to the policing of pro-Palestinian protests in your police force area since 1 October 2023, as well as any overarching EIAs.*

Result of Searches

GMP cannot confirm if it holds some of the information that you have requested without conducting a thorough search on your behalf.

GMP would be required to undertake a substantial review to see if we hold the information relating to question 5 of this request. We do not complete EIA's for specific protests, as the policies and processes that these may linked to are completed as part of daily business needs. This means we would be unable to locate any specific EIA's conducted in relation to the policing of pro-Palestinian protests without examination of all the policy and processes carried out. There are currently 458 policies and processes and to review each one and assess the EIA would take between 20 – 30mins. Therefore, to complete this part of the request would take in the region of 200 or more hours locate and retrieve.

If one part of the request engages a Section 12 response, the whole request will engage a Section 12 response. The reason being is locating, retrieving and extracting any further information would only add to the already exceeded time obligations and so no other searches have been completed at this stage.

as per section 12(2) of the Freedom of Information Act 2000, the cost of searching for the information is above the amount to which we are legally required to respond i.e. the cost of locating 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 attempt to keep this within the fees limit, the information you are requesting will need revising with a reduction in the volume of information required including question 5. However, 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 may 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.