

Date: 11/08/2025
Our ref: 01/FOI/25/014943/A

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/014943/A

I write in connection with your request for information dated 16/06/2025, received by Greater Manchester Police (GMP) for the following information:

Dear FOI Officer, I am submitting this request under the Freedom of Information Act 2000. I am seeking disclosure of the following information in connection with the Regulation 28 (Prevention of Future Deaths) report issued by HM Coroner on 19 February 2024 regarding the death of Samuel Jacob Curless:

- 1. Copies of all internal communications, including emails, memoranda, meeting notes, reports, or briefing materials generated by Greater Manchester Police in response to the PFD report.***
- 2. Documentation of any changes or proposed changes made to Greater Manchester Police training, operational policies, or procedures specifically arising from the recommendations of the Coroner's report.***
- 3. Any audit.***

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 to part 1 and 3 of this request.

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 can 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. This is particularly relevant at this time due to the ongoing demand on GMP's FOI unit which is currently experiencing high workloads and reduced levels of staffing.

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

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*
- 3) Any potentially exempt information cannot easily be isolated because it is scattered throughout the requested material.*

As such, **questions 1 and 3** of your request are 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 each piece of ***“internal communications, including emails, memoranda, meeting notes, reports, or briefing materials”*** and ***“Any Audits”*** 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.

It would require going through every document reading every word to remove personal data and assessing if any elements of these documents warranted any further exemptions or consultations with the corresponding units to ensure nothing causes harm to GMP's future law enforcement duties being carried out.

The number of located documents that potentially fit this request is 66 and due to the length of some correspondence it would take (at a very conservative estimate) of 20 minutes to review and redact each document and liaise with the relevant teams/individuals involved, it would take approximately 22 hours to ascertain the data required for these parts of your request.

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.

However, please see below for the result for the remaining question.

Result for question 2.

When refusing to provide such information because an exemption applies, Section 17(1) of the Freedom of Information Act 2000 requires GMP, to provide you - the applicant - with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies.

This question is exempt under **section 21 – Information accessible to applicant by other means**. The response to this request is available online. Please follow the link below.

[2024-0089 - Response from Greater Manchester Police](#)