Date: 25/07/2025
Our ref: 01/FOI/25/015082/K

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/015082/K

I write in connection with your request for information dated 09/07/2025, received by Greater Manchester Police (GMP) for the following information:

Follow up to 01/FOI/25/014979/M*

" This is a request under FOIA for details of instances in which Greater Manchester Police (including, where applicable, any agencies, bodies, or units for which it is ultimately responsible for supplier payments) has failed to pay its suppliers on time, thereby causing liabilities for late payment compensation and/or interest on late payments to be incurred for the public purse.
Request
We request under FOIA that you provide, (preferably in Microsoft Excel or an equivalent machine-readable format) the following information in respect of suppliers which were not paid in within 30 days for the period starting 1 April 2019 to the date of this request:
The revised request is therefore limited to the following four fields:

- ***Supplier Name***
- ***Invoice Date***
- ***Gross Invoice Value***
- ***Payment Date***

These are standard fields routinely held in all finance and purchase ledger systems, and are essential for day-to-day financial oversight as well as statutory reporting (e.g. under the Better Payment Practice Code and Regulation 113 of the Public Contracts Regulations 2015). I am not asking for any filtering, assessment, or interpretation — just a raw extract of these fields.
I would be grateful if you could please reconsider the request on the above basis.

Result of Searches
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 supply you with the information as an exemption applies.

The exemption applicable to the information requested is **Section 14 – Vexatious or repeated requests.**

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.

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, this request 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 in line with the three points made out above.
Invoices may not be paid within 30 days of the invoice date for reasons other than failing to pay on time including suppliers raising invoices before goods / service are received and disputed invoices. This information is a very large spreadsheet containing over 50,000 invoices. GMP are aware this information gathered may contain sensitive information and therefore to determine whether the invoices engage any exemptions a thorough review to apply redactions would have to be carried out. This would involve-

- **Asking department heads to review their individual sections/invoices and identify any information that would be harmful to disclose into the public domain.**
- **Reviewing these comments to determine whether any exemptions under FOIA were engaged.**
- **Occasionally needing to seek further clarification from department heads / subject experts regarding their reasoning why they highlighted a certain part of the section as harmful.**
- **The FMS department completing a final check of any redactions and the arguments for / against applying the exemption before the redactions could be made and the response sent out to the requester.**

This process would divert department heads / subject experts and staff away from their core functions for significant periods of time. The ICO has provided the following guidance in relation to this:

Requests which would impose a grossly oppressive burden but are not covered by the Section 12 cost limits.

- **69**. An authority cannot claim Section 12 for the cost and effort associated with considering exemptions or redacting exempt information.
- **70**. Nonetheless, it may apply Section 14(1) where it can make a case that the amount of time required to review and prepare the information for disclosure would impose a grossly oppressive burden on the organisation.

The number of invoices located is over 50,000, therefore this request would far exceed a reasonable amount of time permitted to complete.

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