

Date: 08/12/2025
Our ref: 01/FOI/25/015822/W

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/015822/W

I write in connection with your request for information dated 10/11/2025, received by Greater Manchester Police (GMP) for the following information:

Who / when / why the police are investigating Greater Manchester Friends of Palestine bank account?

GMP has confirmed to GMCA - twice as of this morning - that police investigation has been responsible for Virgin Money freezing the bank account of the Greater Manchester Friends of Palestine.

GMP has then, perhaps disingenuously, responded to inquiries from Greater Manchester Friends of Palestine, Greater Manchester MPs and our (GMFP) lawyers, that there is no such investigation - that is to say, on the part of GMP / NW Counter Terrorism.

It is utterly clear from the precise wording now provided by the Deputy Mayor of GMCA - as eventually forwarded from GMP - that our bank account has been frozen since 8/9th July 2025 "as a result of an investigation into Palestine Action" [another and quite different organisation]

Please can you tell us -

- 1. precisely which branch of which police / other forces of law and order / other statutory investigative bodies was conducting such investigation?***
- 2. precisely when this investigation started - and if it is still continuing?***
- 3. precisely who is being investigated and why?***
- 4. precisely who and how the Virgin Money bank was alerted to this investigation so as to cause them to take their drastic action against us?***

Result of Searches

Greater Manchester Police neither confirms nor denies that it holds information relevant to this request by virtue of the following exemptions:

Section 30(3) Investigations

Section 31(3) Law Enforcement

Section 40(5) Personal Information.

Section 30 is a class based qualified exemption and consideration of the public interest must be given as to whether neither confirming nor denying information exists is the appropriate response.

Section 31 is prejudice based and qualified which means that there is a requirement to articulate the harm in confirming or not whether information is held as well as carrying out a public interest test.

Harm for Sections 31

Any release under FOIA is a disclosure to the world, not just to the individual making the request and to confirm or not that information is held would disclose information that could prejudice the prevention and detection of crime, the administration of justice and the investigation of potential offences. Confirming or denying the existence of information relating to any ongoing or potential investigation would reveal whether specific individuals, locations or matters were under police scrutiny. Any confirmation could enable suspects to destroy any evidence, it could jeopardise any covert investigative activity and allow those involved to evade arrests or modify behaviours.

Furthermore, any confirmation or denial could unfairly identify, accuse, or associate individuals with criminal allegations, creating significant reputational harm.

Factors favouring confirmation or denial for S30

Confirming or denying whether information exists relevant to this request would lead to a better-informed general public. This fact alone may encourage individuals to provide intelligence in order to assist with investigations and would also promote public trust in providing transparency and demonstrating openness and accountability into where the police are currently focusing their investigations.

The public are also entitled to know how public funds are spent.

Factors against confirmation or denial for S30

To confirm or deny the information does or does not exist, would prejudice investigations that may or may not be ongoing and would likely undermine Greater Manchester Police's ability to prevent and detect future crimes. Greater Manchester Police need to be allowed to carry out investigations effectively away from public scrutiny until such times as the details need to be made public, otherwise it will be difficult for accurate, thorough and objective investigations to be carried out.

Factors favouring confirmation or denial for S31

There is public interest in transparency and accountability where the police service is concerned as public taxes fund the Police and this obviously favours confirmation or denial.

Factors against confirmation or denial for S31

Greater Manchester Police has a duty of care to the community at large and public safety is of paramount importance. Confirming or denying anything is held relating to this request could directly jeopardise investigative work, impact on the integrity of any evidence and undermine operational policing.

Disclosure of the existence or non-existence of any material would assist criminals in adapting their behaviours, evading detection or exploiting operational information. By neither confirming or denying, avoids revealing or appearing to reveal whether any named or identifiable person/s is or is not a subject to an investigation, which would avoid any unfair harm and safeguarding privacy rights.

Furthermore, maintaining the NCND approach prevents interference with potential or active judicial processes.

Section 40(5) - Personal Information refusal

Section 40(5) - Personal Information – giving information to a member of the public of the confirmation or denial that would have to be given to comply with section 1(1)(a) would (apart from this Act) contravene any of the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

To confirm that any information is held or not, could confirm personal data. In some circumstances confirming or denying whether information is held could itself identify a living individual and would therefore 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.

This use of neither confirm nor deny should not be taken as proof that such information does or does not exist.

Balance Test

To neither confirm or deny any further information is held would suggest that Greater Manchester Police take their responsibility to protect confidential information provided to them seriously and appropriately to ensure the smooth delivery of operational law enforcement.

GMP would never confirm or deny whether information was held if to do so could undermine the prevention or detection of crime and/or the apprehension or prosecution of offenders.

Anything that places that confidence at risk, no matter how generic, would undermine any trust or confidence individuals have in the Police Service.

Moreover, there is a public interest in transparency of policing operations and providing assurances that forces are appropriately and effectively dealing with crime, if disclosing information (including via a confirmation or denial that certain information was held) would identify sensitive investigative activity and risk prejudice to investigations.

The public interest in maintaining the NCND response outweighs the public interest in confirming or denying whether the requested information is held.

Therefore, it is our opinion that for these issues the balancing test for confirming or denying whether any information is held regarding this matter is not made out.

None of the above can be viewed as an inference that the information you seek does or does not exist.