



Date: 19/05/2025
Our ref: 01/FOI/25/014461/N

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/014461/N

I write in connection with your request for information dated 21/03/2025, received by Greater Manchester Police (GMP) for the following information:

1. *Does the Greater Manchester police force have an Information Asset Register for logging significant information assets? Please see this fact sheet published by the National Archives (<https://cdn.nationalarchives.gov.uk/documents/information-management/info-asset-register-factsheet.pdf>) for further clarity on what an Information Asset Register is. The Greater Manchester police may use a different terminology internally to describe this document.*
2. *If yes, please share the most up to date Information Asset Register.*

If this request is too wide or unclear, I would be grateful if you could contact me as soon as possible, as I understand that under the Act you are required to advise and assist requesters. If any of this information is already in the public domain, please can you direct me to it, with page references and URLs if necessary.

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 all the information as an exemption applies.

The information requested exempt under **Section 14(1) - Vexatious 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 public 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 to your request: **Burden on the Authority**. [How do we consider burden, motive and harassment? | ICO](#)

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

As such, your 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 GMP. To provide the data requested in question 2 of your request would involve manual review and redactions to the Records of Processing Activity (ROPA) so they do not contain operationally sensitive and personal information which could identify directly or indirectly a living human therefore Section 31(1)(a)(b) Law Enforcement and 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.

As can be seen from the information provided below in response to question 1 of your request, there are thousands of assets over approximately 50 ROPAs that would have to be manually reviewed and redacted. The time taken to review and redact these documents would cause a grossly oppressive burden on GMP.

The information requested in your other question is not exempt and is provided below.

1. Yes, GMP have multiple asset registers across the different areas of business. We refer to them as our Record of Processing Activity (ROPA). Currently, there are multiple thousands of assets across approximately 50 ROPAs.