



Date: 19/05/2025
Our ref: 01/FOI/25/014639/V

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/014639/V

I write in connection with your request for information dated 22/04/2025, received by Greater Manchester Police (GMP) for the following information:

I am writing to make a formal Subject Access Request under Article 15 of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

I request disclosure of more data held by Greater Manchester Police in relation to stalking and harassment charges.

1. Training Records Relevant to the Officers Involved in My Case

Please provide the following information for all arresting or decision-making officers involved in my case relating to my arrest from [REDACTED] including but not limited to [REDACTED]

- Any data referencing diversity training, disability awareness training, mental health awareness training, or trans/LGBTQ+ inclusion training undertaken by these officers.*
- Please include the dates, locations, and descriptions of any such training sessions.*
- Any documentation that might support or refute the existence of training, guidance, or protocols intended to inform or improve the handling of vulnerable individuals, particularly those with bipolar disorder, or individuals who are gender-questioning or transgender.*

Legal Basis for Requesting Officer Training Information

This request is made under Article 15 of the UK GDPR, which grants individuals the right to access personal data concerning them. Where the behaviour, decisions, or treatment I received were informed (or potentially misinformed) by the officers' training, their training

records constitute indirectly personal data. That is, data which forms part of the context in which decisions about me were made, and which therefore falls within the scope of the GDPR and my right to access.

Furthermore, Recital 63 of the GDPR supports this view, as it affirms that individuals have the right to understand “the logic involved” in how their personal data is processed — particularly where that processing includes profiling, assessment, or decision-making by a public authority.

The presence or absence of adequate training is especially relevant when the police are dealing with individuals who belong to protected groups under the Equality Act 2010.

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 the information as an exemption applies.

Section 17 of the Freedom of Information Act 2000 requires Greater Manchester Police, when refusing to provide such information (because this information is exempt) 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. The information you have requested is exempt from disclosure by virtue of the following exemption: **Section 40(2) – Personal Information.**

Section 40(2) represents information that identifies a living individual, to disclose information relating to specific officers’ training records would breach the principles of the Data Protection Act 2018. Personal data is defined by Section 1 of the Data Protection Act 1998 and means data that relates to an individual who can be identified directly or indirectly from that data.

Section 40 is an absolute exemption and there is no requirement to conduct a public interest test for such data.