



Date: 22/05/2025
Our ref: 01/FOI/25/014657/T

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/25/014657/T

I write in connection with your request for information dated 24/04/2025, received by Greater Manchester Police (GMP) for the following information:

This is the bills from only one site we require all sites under GMP.

Alternitively the email for the procurement manager that deals with the energy contracts.

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 would involve manual review and redactions to the gas and electricity bills so they do not contain operationally sensitive, commercially sensitive or personal information which could identify directly or indirectly a living human. Therefore, Section 31(1)(a)(b) Law Enforcement, Section 40(2) Personal Information and Section 43(2) Commercial Interests will be engaged. 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.

The electricity bill for the entire GMP estate for one month is 497 pages long. The gas bill for the entire estate is 120 pages. The time taken to review and redact these documents would cause a grossly oppressive burden on GMP.

Please note that all payments to EDF Energy over £500 are published on our expenditure reports on our website: [Expenditure over £500 | Greater Manchester Police](#).