



Date: 22/07/2026
Our ref: 01/FOI/26/017116/G

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/017116/G

I write in connection with your request for information dated 23/06/2026, received by Greater Manchester Police (GMP) for the following information:

Thank you for your response dated 23 June 2026 regarding FOI reference 01/FOI/26/017107/F.

I note GMP's position that the original request, particularly Parts 2 and 5–10, would exceed the section 12 cost limit because the relevant information is not held in an easily retrievable format and because initial searches returned over 76,000 results requiring manual review.

In light of your section 16 advice and assistance, I am refining the request. To avoid any ambiguity, please treat the following as two separate refined FOI requests. They are intentionally separated because Request 1 should be answerable without any manual review of individual incident/crime records, while Request 2 is a narrowed data request.

Refined Request 1 — recording, searchability, policy and guidance

This request does not seek counts, incident-level data, crime-level data, keyword-search results, free-text review, or manual review of case files.

Please confirm the following:

1. *Whether GMP has any searchable flag, tag, marker, qualifier, occurrence type, crime category, incident category, VAWG marker, stalking/harassment marker, vulnerability marker, repeat-victimisation marker, public-place sexual harassment marker, or other recording mechanism that could be used to identify reports involving:*
 - *sexualised graffiti;*
 - *graffiti or written material publishing a named person's telephone number or other personal data;*
 - *graffiti or written material naming a person as sexually available;*

- anonymous written sexual harassment in public toilets or publicly accessible venues;
 - public-place harassment involving a phone number or other contact details.
2. *If there is no specific searchable mechanism for the above, please say so clearly.*
 3. *Please provide copies of any policy, guidance, training material, briefing note, crime-recording guidance, risk-assessment guidance or safeguarding/VAWG guidance held by GMP concerning how officers or staff should respond to reports involving:*
 - sexualised graffiti;
 - phone-number graffiti;
 - publication of personal data in public places;
 - anonymous sexualised written harassment in public toilets or public venues;
 - sexual harassment in publicly accessible places;
 - links between such conduct and stalking, harassment, domestic abuse, safeguarding, repeat victimisation or VAWG.
 4. *If no such policy, guidance, training material, briefing note, crime-recording guidance, risk-assessment guidance or safeguarding/VAWG guidance is held, please say so clearly.*

For the avoidance of doubt, this refined request is about GMP's systems, recording mechanisms, policies and guidance. It should not require review of individual case files or incident/crime narratives.

Refined Request 2 — narrowed keyword-count request

This is a separate narrowed request. Please provide the number of recorded reports, incidents, crimes, logs or occurrences containing one or more of the following terms, to the extent this can be done by electronic keyword search without manual review of individual records:

- "toilet graffiti"
- "sexual graffiti"
- "sexualised graffiti"
- "phone number"
- "mobile number"
- "escort"
- "prostitute"
- "slut"
- "whore"
- "call me"
- "sexual harassment"

Please limit this request to the period:

1 January 2025 to the date of search.

If the above still exceeds the section 12 cost limit, please provide section 16 advice and assistance by confirming:

1. *which of the listed search terms creates the highest volume of results;*
2. *whether a shorter time period would bring the request within the cost limit;*
3. *whether limiting the search to crimes only, incidents only, public-order records only, harassment/stalking records only, or VAWG/safeguarding-flagged records only would bring it within the cost limit;*

4. *what searchable fields or recording categories GMP can use without manual review;*
5. *what wording GMP would suggest for a request capable of being answered within the cost limit.*

For clarity, I am not asking GMP to manually review records to determine whether each result substantively relates to targeted sexualised graffiti. If a caveat is required, I am content for GMP to provide raw keyword counts with an explanation that they may include false positives and have not been manually validated.

Please confirm receipt and confirm that these are being treated as two separate refined FOI requests.

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.

CAVEATS

REQUEST 1:

1. There is no specific flag for crimes that would fit these descriptions.
2. There is no specific flag for crimes that would fit these descriptions.
3. 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 this question of your request would involve manual review and redactions to ten separate policy & procedure documents that have been identified as within the scope of your request, 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.

There are 240 pages of policy documents 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.

Request 2:

CAVEATS:

In July 2019, GMP implemented one of the largest IT infrastructure changes in UK policing. The systems are in continual development and the data provided for this request is what the systems currently hold.

The crime data is excluding cancelled crimes and crimes classified as non-counting fraud. Further information about cancelled crimes can be obtained from the Home Office Counting Rules. Details regarding fraud crime can be obtained by contacting the NFIB.

The incident data is excluding incidents with a closing code of L10 Duplicate, L19 Error or L22 Test or training.

The keyword methodology does not account for spelling errors.

Please note, just because these words/phrases are contained within these fields, it doesn't mean these are relevant to the desired context of this request.

There are 4,785 crimes with crime MO description or crime description fields containing the requested keywords/phrases, and 8,327 incidents with the title, details, or contact comments fields containing the requested keywords/phrases.