



Date: 11/06/2026  
Our ref: 01/FOI/26/016710/O

**FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/016710/O**

I write in connection with your request for information dated 15/04/2026, received by Greater Manchester Police (GMP) for the following information:

1. *Any local policies, guidance, training materials, or standard operating procedures used by GMP officers relating to the use of the Police National Computer (PNC), including the application of warning markers or signals.*
2. *Any local guidance or instructions provided to officers regarding the recording of personal descriptors, including sex, gender, or previous names, when using PNC or related systems.*
3. *Any internal documents, training materials, or briefing notes used by GMP which reference how officers should interpret or apply national PNC guidance in practice.*

*This request is limited to information held by GMP.*

**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, but I am not obliged to provide it as an exemption applies. Section 17 of the Freedom of Information Act 2000 requires GMP, when refusing to provide such information (because the 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 requested in question 3 is exempt from disclosure by virtue of **Section 31(1)(a) - Law Enforcement, Section 41(1) – Information Provided in Confidence** and **Section 43(2) – Commercial Interests**.

Section 31 is a prejudice-based and qualified exemption. There is a requirement to articulate the harm in disclosing such information as well as carrying out a public interest test.

### **Section 31 - Evidence of Harm**

Disclosure of the information on training materials for Police Officers could be of intelligence value to a person or persons with criminal or malicious intent. The disclosure could provide and enable targeted malicious actions, be that some form of attack on an operational team or officer or avoiding that team for example where strengths and weakness may be perceived (whether incorrectly or not). Providing details of training provides opportunities for criminality to benefit, or for risks to be extended to members of the public.

### **Public Interest Test Section 31 - Factors favouring disclosure**

Providing this information would make members of the public more aware of the level of training Police Officers receive. It will also show accountability and that public funds are being spent appropriately.

### **Section 31 - Factors favouring non-disclosure**

The Police Service exists to protect and serve the public through the prevention and detection of crime. To provide such information at force level, it could compromise law enforcement tactics which would hinder GMP's ability to successfully investigate crimes. The threat of crime will increase as more crimes are committed because of criminals gaining knowledge about the capabilities of the forces. Therefore, the public will be placed at a greater risk. A fear of crime will be realised as criminals identify different levels of training regarding different officers and target and exploit this resulting in the public being in fear of more criminal activity occurring. The safety of the public is of paramount importance to Greater Manchester Police and to release the requested information would compromise the safety of the community that Greater Manchester Police serve to protect and place individuals at risk.

### **Balancing Test**

When balancing the public interest Greater Manchester Police must consider whether the information should be released into the public domain. Arguments need to be weighed against each other. The most persuasive reason for disclosing the information would be openness. However, this needs to be weighed against the strongest reason for non-disclosure which is the fact that individuals may be placed at risk and the effect it may have on the prevention and detection of crime and protecting the people and communities we serve. Having considered all the factors for and against disclosure, the reason against disclosure outweighs the reason for disclosure and so the decision at this time to maintain the above exemption and withhold the information from disclosure.

**Section 41** is an absolute exemption and there is no requirement to consider the public interest. We are satisfied that all criteria can be met in line with the Information Commissioner's guidance. This information is exempt as it was provided to GMP under license from The College of Policing and the disclosure of the requested information to the public, would constitute a breach of confidence actionable by The College of Policing. Details of the license terms can be found on The College of Policing's website: [Licensed products | College of Policing](#).

**Section 43** is a qualified, class-based exemption. There is a requirement to conduct a public interest test.

### **Section 43 – Factors in Favour of Disclosure**

Providing this information would make members of the public more aware of the level of training Police Officers receive. It will also show accountability and that public funds are being spent appropriately.

### **Section 43 – Factors Against Disclosure**

However, we must also consider the wider impact of disclosing detail about licensed training materials. Releasing this information under FOIA would render the licensing process obsolete, forces would no longer have to obtain the material from the College because it would be publicly accessible to the world-at-large. This means the authors of the training materials would have no control over how the material is used nor would the College of Policing be able to generate income via the licensing process.

### **Section 43 – Balancing Test**

When balancing the public interest Greater Manchester Police must consider whether the information should be released into the public domain. Arguments need to be weighed against each other. The most persuasive reason for disclosing the information would be openness. However, this needs to be weighed against the strongest reason for non-disclosure which is the risk to the College of Policing's ability to protect its products and commercial revenue streams. Having considered all the factors for and against disclosure, the reason against disclosure outweighs the reason for disclosure and so the decision at this time to maintain the above exemption and withhold the information from disclosure.

In accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice