

Date: 25/02/2026
Our ref: 01/FOI/26/016439/S

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/016439/S

I write in connection with your request for information dated 22/02/2026, received by Greater Manchester Police (GMP) for the following information:

This request is made under the Freedom of Information Act 2000 (England and Wales), Freedom of Information (Scotland) Act 2002, and the Freedom of Information Act (Northern Ireland) 2000. I request the following information for the period 1 January 2016 to 31 December 2026, where centrally recorded and retrievable without exceeding the statutory cost limit.

For the purposes of this request, special category data includes data revealing or relating to gender, gender identity, legal gender recognition, gender history, and any previously used names.

1. Policy, Procedure & Guidance (Special Category Data)

Please provide copies of any:

- ***Written force policies***
- ***Standard Operating Procedures***
- ***Internal guidance***
- ***National guidance***
- ***Instruction documents that govern the rectification, amendment, or updating of gender marker data on the Police National***
- ***Computer (PNC) following a person's legal gender recognition, including guidance specific to special category data.***

2. Staff Guidance & Training (Special Category Data)

Please provide copies of any guidance, training materials, briefings, or internal instruction provided to:

- ***Professional Standards Teams***
- ***Data Protection Officers / IG Teams***
- ***Records/PNC administrators***

- **Custody and detention staff**
- **Vetting or Disclosure teams**
- **that covers processing requests to correct gender marker or special category data on PNC.**

3. Statistical Information (2016–2026)

Where centrally recorded, please provide in computer readable format (e.g., CSV, Excel, database export):

a. Number of requests received to rectify or amend gender marker / special category data on PNC.

b. Number of requests actioned and rectified.

c. Number of requests refused or not actioned.

d. Any recorded reasons for refusal or non action.

If these requests are recorded but not coded specifically as “gender marker” requests, please advise how they are recorded and provide equivalent statistics.

4. Complaints & Legal Escalations

For the period 2016–2026:

a. Number of formal complaints received relating to failure to rectify gender marker or special category data on PNC.

b. Number of times your force has engaged in specialist legal action or formal legal review to address gender marker/special category data correction requests.

c. Any recorded outcomes of such actions.

5. Recording & Categorisation

Please confirm whether your force records requests for gender marker/special category data correction as a distinct category or code in case management, CRM, records, or reporting systems, and provide details of how these are categorised.

6. Operational & Safeguarding Guidance

Please provide:

a. Policies or guidance that officers, custody staff, and other personnel must follow when encountering a person whose PNC gender marker does not reflect their legal gender.

b. Any training or guidance on handling such discrepancies safely and respectfully.

c. Records, summaries, or statistics of incidents where discrepancies between an individual’s legal gender and PNC gender markers resulted in safeguarding concerns, operational errors, or harm.

d. Current mechanisms for urgent correction or override of gender marker data to prevent harm.

e. Escalation protocols or processes followed when systemic failures in PNC gender marker or other special category data are identified.

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 some of the information requested is held by GMP.

However, GMP does not hold the information that you have requested in an easily retrievable format.

GMP would be required to carry out a substantial review manually on parts of this FOI to provide a full response on data held and to confirm if some data is held or not. In relation to questions 3 and 6d, it has been quickly recognised from how our systems record data that to rectify or amend PNC gender marker or special category data are not recorded under a distinct category or searchable code within our organisation.

To identify any relevant cases for the period 2016–2026, we would be required to manually review each general PNC amendment, correction, or data-quality request. We would need to read individual records to determine whether each request related to national PNC systems or local systems. We would also be required to liaise with multiple units to confirm whether actions were completed, refused, or otherwise handled; and finally, manually extract any outcomes or reasons for refusal. This would involve the individual examination of thousands of case records over a 10-year period. For these parts of the FOI alone this request would far exceed 18hrs and so cannot be completed.

If one part of the request engages a Section 12 response, the whole request will engage a Section 12 response. The reason being is locating, retrieving and extracting any further information would only add to the already exceeded time obligations and so no other searches have been completed at this stage.

Therefore, as per **Section 12(1)** of the Freedom of Information Act 2000, the cost of providing you with the information is above the amount to which we are legally required to respond i.e. the cost of locating and retrieving the information exceeds the 'appropriate level' as stated in the Freedom of Information (Fees and Appropriate Limit) Regulations 2004.

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

GMP is obligated, pursuant to section 16(1) of the Act to provide you with advice and assistance on refining your request to bring compliance within the fees limit. In order for the force to attempt to keep this within the fees limit, the information you are requesting will need revising with a reduction in the time frame and a major review of the volume of required information. Within each question there are multiple breakdowns requested and each one on its own would be a large scale piece of work to locate and extract anything held. Added up, this would potentially encroach on exceeding 18hrs and so the advice would be to dramatically scale this back to a smaller amount of required data. Included in this would be to review Q3. For example, limiting this question to 3A only with a smaller timeframe may assist.

With any request that requires a manual review there is always a chance of a request being refused under S12 due to the enormity of work that is usually needed to provide the data, therefore the resulting response cannot be guaranteed at this point as it will be dependent upon the number of records that fall within the scope of any new request, as they would still have to be manually assessed.

Should you wish to refine and resubmit your request in line with the advice above please respond to freedomofinformation@gmp.police.uk.