



Date: 15/04/2026
Our ref: 01/FOI/26/016374/S

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/016374/S

I write in connection with your request for information dated 12/02/2026, received by Greater Manchester Police (GMP) for the following information:

I am writing to request information under the Freedom of Information Act 2000.

On April 1, 2024, the Human Tissue Act 2004 (Supply of Information about Transplants) Regulations 2024 came into force. This introduced a mandatory duty for clinicians to report suspicions of organ trafficking or transplants undertaken abroad to the Human Tissue Authority (HTA).

The HTA has confirmed that between April 1, 2024, and May 8, 2025, they referred 17 cases involving such reports to police forces in the UK. It is in the public interest to understand when and where this exploitation is taking place, and how.

Please provide the following information for the period April 1, 2024, to the present:

- 1. The number of reports or referrals received by your force from the Human Tissue Authority (HTA) regarding suspected violations of the Human Tissue Act, the Modern Slavery Act (related to organ harvesting), or the Supply of Information about Transplants Regulations 2024.*
- 2. For each of these referrals, please state the current status of the investigation (e.g., ongoing investigation, filed pending further information, closed with no further action, person charged).*
- 3. Please categorise whether the referral is related to:*
 - Suspected organ trafficking/harvesting within the UK; or*
 - Suspected illegal/unethical transplants carried out abroad (medical tourism).*
- 4. Please provide the date each referral was received by your force.*

If you cannot identify referrals specifically from the "HTA" or "Human Tissue Authority" via your recording system, please perform a keyword search of crime reports and intelligence logs for the terms "organ harvesting," "organ trafficking", "forced organ donation," and "unlicensed transplantation" within the specified date range.

I would prefer to receive this information electronically in a machine-readable format (e.g., .csv or .xlsx).

If you are encountering practical difficulties complying with this request, please contact me so that we can discuss the matter and, if necessary, I can modify the request.

Result of Searches

Greater Manchester Police (GMP) can neither confirm nor deny, that it holds the information you have requested by virtue of the following exemptions:

S23(5) - Information supplied by or Concerning Certain Security Bodies

S24(2) - National Security

S27(4) - International Relations

S31(3) - Law Enforcement

S40(5) - Personal Information

Sections 24, 27 and 31 are qualified exemptions and as such there is a requirement to articulate the harm and conduct a test of the public interest in confirmation or denial.

Evidence of Harm:

Confirming or denying whether information is held at force level about referrals from the Human Tissue Authority (HTA) relating to suspected organ trafficking, unlawful transplantation, or medical tourism would be likely to cause **real, significant, and foreseeable harm** across several sensitive areas of policing, national security, and international cooperation.

The effective conduct of international relations relies on maintaining trust and confidence between states and international organisations. A loss of such confidence would significantly undermine the UK's ability to protect and promote its interests internationally. In this context, confirming or denying whether the UK holds information about any countries that may have liaised with security bodies regarding alleged medical tourism would be likely to breach that trust. Such a breach would have wider implications for both international relations and national security.

Similarly, confirming or denying at force level whether information is held about alleged criminal activity involving any individuals would be likely to prejudice the prevention and detection of crime, as well as the apprehension and prosecution of offenders. Providing confirmation or denial responses in relation to unconfirmed allegations would allow the public to build a picture of who may have been subject to allegations or arrests. This would undermine policing functions, deter victims and witnesses from coming forward, and create a mosaic effect that reveals where investigations have taken place or where potential offending may have gone unreported.

Public Interest Considerations:

Factors favouring confirmation or denial information is held - s24 National Security:

We appreciate the importance of the public being informed on how public money is being spent and how public authorities conduct their activities and generate their income. Confirming whether any information regarding policing both to other international states and vice versa is held would increase public confidence and allow for better informed public debate.

Factors favouring not confirming or denying information is held - s24 National Security:

To confirm or deny whether any other information is held risks prejudicing national security. Organ trafficking and unlawful transplant activity frequently involve organised criminality operating across borders, often engaging with networks whose activities intersect with national security interests. Any confirmation or denial of whether the force holds information relating to HTA referrals could indicate where UK policing or intelligence partners are (or are not) active in monitoring specific groups or routes, reveal patterns that could be exploited by criminals to avoid scrutiny or adapt their methods and undermine the consistent NCND position required to prevent offenders identifying capability gaps through “mosaic” analysis. This would compromise the effectiveness of security arrangements designed to protect vulnerable individuals from exploitation and prevent the UK from becoming a location exploited by transnational criminal networks.

It is not in the public interest to compromise ongoing or future operations which protect the security or infrastructure of the UK by undermining the need to use the NCND approach to such requests consistently.

Factors favouring confirmation or denial information is held - s27 International Relations:

There is a clear public interest in making appropriate information available to the public. Confirmation or denial information is held would act to reinforce the commitment of (force name) as an open and transparent organisation, serving to maintain public confidence in the force and the wider policing service as a whole. Moreover, use of public money, as well as the income generated by public bodies is also a matter of strong public interest.

Factors favouring not confirming or denying information is held - s27 International Relations:

Confirming or denying information is held in this case is very likely to compromise the ability of the UK to promote and protect its interests abroad whilst also undermining the UK’s ability to form new and mutually beneficial relationships with other states. The damage that confirmation or denial is likely to cause to the UK’s international relations in this case cannot be said to be in the public interest. The UK depends on constructive, confidential bilateral and multilateral relationships to investigate and disrupt international exploitation. Any erosion of that trust would have wider and lasting implications beyond a single case or request.

Factors favouring confirmation or denial information is held - s31 Law Enforcement:

This FOIA request relates to the involvement of GMP in multi-agency, cross-border operations concerning organised criminality of organ harvesting, and there is likely to be a

public interest into what specific involvement each agency had within such an investigation. Therefore, this in itself favours confirming whether the information is held.

Factors favouring not confirming or denying information is held s31 - Law Enforcement:

There is an inherently strong public interest in public authorities carrying out investigations to prevent and detect crime. GMP need to be allowed to investigate crime effectively and ensure that offenders are brought to justice. To confirm or deny that the requested information is held could compromise law enforcement tactics in the area of organised criminality, which would hinder the UK Police service's ability to prevent and detect criminality in this area. By confirming GMP's involvement in an investigation or alternatively stating that they had no involvement in any such cases, would give vital information to criminals regarding areas of more or less policing activity. Those with intent could take steps to avoid detection if they are aware of force areas that do not take part in such operations. The ability of the UK police service to effectively investigate organised crime would be severely compromised. Given the niche nature of organ trafficking, even a nil response could be operationally damaging. A zero today followed by "one" in future would signal a new case has emerged, alerting offenders and undermining intelligence-led policing.

Section 40(5B)(a)(i):

Once information is disclosed under the FOI there is no control or limits as to who or how the information is shared with other individuals. Therefore, a release under FOI is considered a disclosure to the world in general.

To confirm or deny that GMP hold or do not hold information about an individual in relation to a specific matter could potentially disclose information about a living, identifiable individual. This would amount to a release into the public domain of personal information about an individual. The individual in question would have no expectation that this information would be released into the public domain, and therefore their rights under the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) would be breached by release.

In this instance, processing this information (by issuing a confirmation or denial) would breach the first principle, that of 'lawful, fair and transparent' processing. When balancing the legitimate interests of the public against the interests of the individual and the harm and distress that would be caused by a confirmation or denial, the processing of information in this way becomes unlawful and Section 40(5A)(a)(i) is made out.

Balance Test:

The Police Service is responsible for enforcing the law, preventing and detecting crime, and protecting the communities we serve. The security of the country is paramount, and therefore GMP Police will not confirm or deny whether information is held if doing so could endanger individuals, compromise law enforcement, or undermine national security.

While transparency and public reassurance about policing activity are important, there is a stronger public interest in safeguarding national security and protecting the integrity of sensitive investigations and operations.

For these reasons, the public interest favours neither confirming nor denying the existence of the requested information. This response should not be taken as indicating whether such information does or does not exist.