

Date: 15/05/2026
Our ref: 01/FOI/26/016836/B

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/016836/B

I write in connection with your request for information dated 07/05/2026, received by Greater Manchester Police (GMP) for the following information:

FOI Request A — GMP Written Policy on Amalgamation

Provide a copy of any written policy, standard operating procedure, internal guidance, or training material held by GMP that sets out when and how the force applies Regulation 5 of the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (the aggregation / amalgamation provision) to requests received from the same person within 60 working days. Include any internal guidance on what constitutes requests for "the same or similar information" for the purposes of that Regulation. If no such written guidance exists, confirm this explicitly.

FOI Request B — Amalgamation Notices Issued (Volume)

For the period 12 April 2024 to 12 April 2026, provide the total number of occasions on which GMP issued a notice to a requester stating that two or more of their FOI requests had been amalgamated, merged, or combined under Regulation 5 of the Fees Regulations 2004. Provide this as a single total figure only. If GMP does not record this as a distinct category, confirm this explicitly, as that answer is itself responsive to this request.

FOI Request C — Internal Review Challenges to Amalgamation Decisions

For the same period (12 April 2024 to 12 April 2026), of any amalgamation notices issued as described in Request B: provide (a) the total number that were subsequently challenged by the requester via the internal review process; (b) the total number of those internal reviews that resulted in the amalgamation being upheld; and (c) the total number that resulted in the amalgamation being reversed and the requests being treated separately. Provide as three figures only.

FOI Request D — ICO Complaints and Decisions Regarding GMP Amalgamation

For the period 12 April 2021 to 12 April 2026, provide the total number of complaints received by the Information Commissioner's Office in which GMP's use of the amalgamation or aggregation provision was specifically identified as a ground of complaint, and the number of ICO Decision Notices issued against GMP in which amalgamation was found to have been incorrectly applied. If GMP does not hold this information, confirm this explicitly and identify the correct route by which it may be obtained.

FOI Request E — Equality Impact Assessment of FOI Handling Practices

Provide any equality impact assessment, equality analysis, or Public Sector Equality Duty compliance document held by GMP that covers the force's FOI handling practices, including but not limited to the use of cost limit refusals, amalgamation notices, and the accessibility of the FOI request and internal review process to people with disabilities, mental health conditions, or other vulnerabilities. If no such assessment exists, confirm this explicitly.

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 unable to respond to requests B and C of this FOI without carrying out a review manually across GMP systems. Searches have been completed on our system and we have identified 1,115 records dated between 12th April 2024 -12th April 2026. However, to determine if any of these requests have been closed due to being amalgamated, merged, or combined would require a manual review of each individual record due to how this data is recorded and stored. In addition, the 1,115 records located would also have to be checked to see how many of these match all the elements you have asked in request C. At approximately 5-10 minutes to review each one, this FOI would take in the region of 130hrs to process.

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 reduced time frame. 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.

Although excess costs remove GMP's obligations under the Freedom of Information Act 2000, as a gesture of goodwill I have supplied some information relative to your request that was retrieved before it was realised that the fees limit would be exceeded (see below information). I hope that this is of use to you, but it does not affect our legal right to rely on the fee's regulations for the remainder of your request.

- A. No information held. – FOI caseworkers will follow the ICO guidance and make decisions based on this.
- B. See exemption above.
- C. See exemption above.
- D. GMP do not hold the **total** number of complaints received by the ICO as the applicants do not notify GMP on every occasion. Please contact the ICO for this information.
- E. No information held.