GREATER MANCHESTER POLICE

Tuesday, 06 October 2026
Our ref: 01/FOI/26/017734/A

**FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/017734/A**

I write in connection with your request for information dated 28/09/2026, I note you seek access to the following information:

*I am conducting research on modern slavery/trafficking in persons victims' use of the Section 45 defence of the Modern Slavery Act 2015.*

*Noting that the most recent (2026) Group of Experts on Action against Trafficking in Human Beings (GRETA) report noted at paragraph 244 that 'As of April 2025, police forces in England and Wales are required to use a new Section 45 identifier, which will provide investigators with a standard operating procedure to record when the statutory defence has been raised on a crime record, and should allow to extract data', I would like to have:*

*For each year for the period 2025 to 2026 (and earlier (from 2015), where data is available):*

1. *How many individuals who claim that they are modern slavery/trafficking victims OR are suspected by your force to be victims, have been 1) arrested and 2) charges brought for administrative (immigration) and/or criminal offences that they were allegedly compelled to commit by human traffickers?*
   - *1a. How many of these individuals (#1) have explicitly raised the S 45 defence at the point of arrest or charging?*
   - *1b. How many have been 1) arrested and 2) charges brought for administrative/immigration-related offences?*
   - *1c. How many have been 1) arrested and 2) charges brought for less serious criminal offences?*
   - *1d. How many have been 1) arrested and 2) charges brought for serious criminal offences?*
   - *1e. What is the proportion of a) men, b) women, and c) children who make up the total number for #1?*
   - *1f. What is the proportion of foreign nationals who make up the total number for #1?*

2. *How many of the total number (#1) who allege that they are victims of trafficking have been referred by your force to the National Referral Mechanism (NRM)?*
3. *What percentage of the total number of cases (# 1) have had charges dropped by the force in light of the individual's potential (Reasonable Grounds Decision) or confirmed (Conclusive Grounds Decision) victim status?*
4. *What percentage of the total number of cases (#1) have had charges dropped by the force in response to their raising of the S 45 defence?*
5. *In what percentage or number of the total number of cases (#1) did the force proceed with recommending prosecution for the victims' alleged commission of offence/s?*
   *5a. Of this percentage or number (#5) what are the main offences for which the police have decided to pursue prosecution?*
   *5b. Of this percentage or number (#5), how many individuals have been adult foreign females?*
6. *If these questions cannot be answered, please provide a narrative summary of the force's engagement with potential modern slavery/trafficking in persons victims who are alleged to have committed administrative and/or criminal offences and who have raised the S 45 defence. Or an explanation of why data cannot be shared.*

**Result of Searches**

Following receipt of your request searches were conducted within Greater Manchester Police to locate information relevant to your request. I can confirm that the information you have requested is held by Greater Manchester Police.

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

Our system does not feature automated tools to extract S45 defences. Consequently, retrieving the requested information for Parts 1 to 5 will require a manual review of our crime records, and GMP record hundreds of thousands of crimes annually. We estimate that manually reviewing each log to identify relevant information would vastly exceed the 18-hour statutory cost limit.

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.

Although this removes GMP's obligations under the Act, as a gesture of goodwill, I have supplied information, relative to your request please see below.

Part 6 - As a narrative, if a S45 defence is raised, police will seek the PV's account of events if they are willing to provide this and follow any lines of enquiry that may result. Officers are also made aware of their 'positive obligation' upon the police to investigate 'situations of potential trafficking' & alert to the particular circumstances or situations where someone suspected of committing a criminal offence might also be a victim of trafficking or slavery without relying on the defence being raised by the individual or their legal representative. Specially trained MS TAC advisors (modern slavery tactical advisors) are used to provide advice regarding any investigative opportunities and the force has trained Modern Slavery VLOs (victim liaison officers) who can support any identified adult victim of modern slavery to understand the NRM process to make informed choices about consenting to any NRM referrals.

In accordance with Section 16(1), the duty to provide advice and assistance, of the Freedom of Information Act 2000. Greater Manchester Police will be unable to provide advice for you to reduce Part 1 to 5 of the request in order for the force to keep this within the fees limit as the only method to collate the data is reviewing the record individually.