Information Management & Data Directorate (IMDD)
Information Access Unit

Date: 14th October 2026
Our ref: FOI/26/017834/D

FREEDOM OF INFORMATION REQUEST REFERENCE NO: FOI/26/017834/D

I write in connection with your request for information dated 12/10/2026, received by Greater Manchester Police (GMP) for the following information:

FOIA: GMP use of invisible/white-on-white redactions

Under the Freedom of Information Act 2000, please provide recorded information concerning GMP's use of white-on-white or otherwise visually imperceptible redactions in documents disclosed to members of the public, particularly Subject Access Request disclosures.

For this request, "invisible redaction" means concealment using white boxes, white text, background-coloured overlays or similar methods whereby the recipient cannot readily identify where information has been withheld.

Please provide:

1. The earliest recorded date on which GMP introduced, approved or adopted invisible redaction for external disclosures.
2. The earliest policy, instruction, decision, email, implementation document or other record evidencing its introduction.
3. Any record identifying who authorised or approved the practice, including their name/rank/official role where disclosable, and the date of authorisation.
4. Whether the practice was approved or considered by GMP's Data Protection Officer, Information Governance, Legal Services or other senior management, and any recorded decision/minutes evidencing this.
5. Current policy, SOP, staff guidance or technical instructions governing invisible/white-on-white redactions.
6. Any superseded policy or guidance specifically addressing this practice.
7. Any recorded legal, data-protection or compliance assessment considering whether invisible redactions are compatible with the Data Protection Act 2018 and/or applicable ICO guidance.

8. Any recorded assessment of the risk that invisible redactions could cause recipients to believe that a passage is complete when information has actually been removed, thereby changing or obscuring its apparent context.
9. Any accessibility/equality assessment concerning invisible redactions, including their use in disclosures to disabled persons.
10. Any internal audit, quality-assurance review or recommendation since 1 January 2020 concerning the use of invisible redactions.
11. Any recorded complaint, ICO finding/recommendation or other regulatory criticism since 1 January 2020 specifically concerning GMP's use of invisible/white-on-white redactions. Personal information may be removed.
12. Whether current GMP policy permits or prohibits invisible redactions, and the date of the most recent review.
13. Any current instruction explaining how recipients are to distinguish genuine blank space from information deliberately removed from a disclosed document.

I seek existing recorded information, not the creation of new information or explanations.

For historical material, I seek the earliest identifiable authorisation/implementation records, not every subsequent document.

If no formal policy or authorisation for introducing invisible redactions is held, please confirm this. If the practice resulted from software configuration or an informal procedure, please provide any recorded information identifying that arrangement.

If s.12 FOIA is engaged, please provide s.16 advice and assistance. My priority is questions 1-5, 7, 8 and 12.

Where only part of a document is exempt, please disclose the remainder.

Please respond electronically. I require email-only communication as a disability-related reasonable adjustment.

Result of Searches

Following receipt of your request searches were conducted within Greater Manchester Police (GMP) to locate the requested information.

Question 1 – July 2023.

Question 2 – No information held. GMP do not have a relevant policy.

Question 3

Section 17 of the Freedom of Information Act 2000 requires Greater Manchester Police, when refusing to provide such information (because this 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.

Section 40 is an absolute exemption with no requirement to complete a public interest test.

The disclosure of this information constitutes personal data and is therefore exempt from disclosure. Personal data is defined by Article 4 of the GDPR and Part 1 of the Data Protection Act 2018 and means any information relating to an identified or identifiable natural person ('data subject'). An identified natural person is one who can be identified directly or indirectly from that data.

Section 40(2) of the FOIA, as to disclose this information would contravene the first of the data protection principles. This states that personal data should be processed lawfully, fairly and in a transparent manner. It is the fairness aspect of this principle which, in our view, would be breached by disclosure. In such circumstances Section 40 confers an absolute exemption on disclosure and therefore there is no requirement for us to conduct a public interest test.

Question 4 – Yes, Data Protection. No information held regarding meeting records or minutes.

Question 5 & 6 – No information held. GMP do not have a relevant policy, SOP, staff guidance or technical instruction.

Question 7 – No information held.

Question 8 – No recorded assessment.

Question 9 – No information held.

Question 10 – No information held.

Question 11

GMP cannot confirm if it holds all the information that you have requested without conducting a thorough search on your behalf.

We are unable to filter all complaints by topic. To determine if we have received any complaints relevant to this request would require a manual review of each complaint received between 1st January 2020 and 6th October 2026. From an initial search we have received over 350 complaints. At a conservative estimate of 5 minutes per complaint, this request will take in excess of 29 hours to confirm if we hold any data relevant to question 11.

Therefore, as per section 12(2) of the Freedom of Information Act 2000, the cost of searching for the information is above the amount to which we are legally required to respond i.e. the cost of locating 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.

Section 16(1) – the duty to provide advice and assistance – of the Freedom of Information Act 2000, Greater Manchester Police will be unable able to provide advice for you to reduce the request in order for the force to keep this within the fees limit as a manual review would still be required.

Question 12 – GMP do not have a relevant policy.

Question 13 – No information held.