

Date: 03/09/2026
Our ref: 01/FOI/26/017537/X

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/017537/X

I write in connection with your request for information dated 28/08/2026, received by Greater Manchester Police (GMP) for the following information:

I request copies of recorded information held by Greater Manchester Police concerning how GMP assesses whether a complainant has been "adversely affected", distressed, traumatised, or otherwise personally affected for the purposes of complaint eligibility, complaint recording, or complaint handling.

Please provide:

- 1. Any policy, procedure, guidance, checklist, training material or decision-making framework used by PSD, complaint handlers, appropriate authorities or supervisors when deciding whether a person has been "adversely affected".***
- 2. Any guidance or training on assessing distress, trauma, psychological impact, emotional impact, public-confidence harm, or other non-physical adverse effect in police complaints.***
- 3. Any guidance or training on whether a person can be adversely affected by viewing police-published footage, social media footage, CCTV, body-worn video, mobile-phone footage, online material, or other recorded material.***
- 4. Any guidance or training on whether complainants need medical evidence, a doctor's letter, diagnosis, or other external proof before GMP accepts that they have been adversely affected.***
- 5. Any guidance, template wording, internal advice or legal advice summaries used when refusing to record a complaint because the complainant was not physically present at the original incident but viewed footage or police-published material.***

6. Any guidance or training on the distinction between being adversely affected by the underlying incident and being adversely affected by GMP's own publication, captioning, retention, promotion or governance of that material.

7. Any guidance or training on when an organisational complaint about GMP communications, Corporate Communications, publication decisions or public messaging should be recorded under the police complaints framework.

For the avoidance of doubt, I am asking for recorded policies, training materials, guidance and decision-making materials. I am not asking for personal data of individual officers. If names or direct identifiers appear, please redact those rather than refusing the request in full.

8. Finally, given [REDACTED] refusal to answer the accountability questions and his indication that I should not continue emailing PSD colleagues, please identify the correct senior PSD contact or appropriate authority contact for escalation of the refusal to answer those questions.

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 the information requested is held by GMP.

However, I am not obliged to supply all of the information you have requested as an exemption applies.

When refusing to provide such information because an exemption applies, Section 17(1) of the Freedom of Information Act 2000 requires GMP, 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.

Questions 1, 2, 3, 5, 6 & 7 are exempt under **Section 21 – Information accessible to applicant by other means**. The response to these questions is available online. GMP follow the national IOPC guidance to establish who is eligible to make a complaint Please follow the link below.

[Statutory guidance - 2020 | Independent Office for Police Conduct \(IOPC\)](#)

In addition, 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.

Question 8 is exempted from disclosure under **Section 40(2) Personal Information** –Some information you have requested constitutes personal data of an identifiable living individual/s, and to disclose this information would breach the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Personal data is defined by Section 1 of the Data Protection Act 2018 and means data that relates to an individual who can be identified directly or indirectly from that data.

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

The remainder of this request is below.

Question 4.

No information held – Medical evidence is not a requirement.