



Medicines & Healthcare products
Regulatory Agency

MHRA Central Freedom of
Information Team
10 South Colonnade
Canary Wharf
London
E14 4PU

foi.request@mhra.gov.uk

[MHRA Website](#)

Our Ref: **FOI2026/00401**

30 April 2026

Dear [REDACTED]

Thank you for your Freedom of Information (Fol) request received on 15 April. You wrote:

I would like to request the following information under the Freedom of Information Act.

1. Please could you tell me how much was spent by staff in your organisation on the Government Procurement Card, or any other credit card paid using public funds, in each of the following years:

- a) 2026 to date
- b) 2025
- c) 2024
- d) 2023

2. For each year in question 1, please provide a full breakdown of the items purchased and if possible, please state the item, the amount spent, the date and any details you hold on the reason the item was purchased.

3. Please state how many of these Government Procurement cards (or other cards paid using public funds) were in use in your organisation in each of the following years:

- a) 2026 to date
- b) 2025
- c) 2024
- d) 2023

MHRA Response

We can confirm we hold the information, however some information is exempt under Section 14(1) of the Fol Act, since public authorities are not obliged to comply with a request which is deemed vexatious. By way of clarification, it is the request which is treated as vexatious not the person making the request.

A request may be treated as vexatious, if the amount of time required to review and prepare the information for disclosure would impose a grossly oppressive burden on the organisation.

A vexatious request is assessed with reference to all the circumstances of an individual case. There are four broad themes to consider when looking at whether an FoI request(s) is vexatious. These four themes are:

1. the burden (on the public authority and its staff);
2. the motive (of the requester);
3. the value or serious purpose (of the request); and
4. any harassment or distress (of and to staff).

These four broad themes are not a checklist, and they are not exhaustive they simply emphasise that a range of factors need to be considered when applying Section 14(1).

The MHRA is providing a Government Procurement Card (GPC) transactions report containing the information that can be disclosed without imposing a disproportionate burden on the Agency. To the extent that the report does not fully reflect the scope of your request and a full breakdown of the items purchased hasn't been provided. MHRA is treating that part of your request as vexatious for the following reasons:

- The request would require the manual review and redaction of approximately 7,800 individual transactions across four financial years, as the data is not held in a disclosure-ready format. Much of the information within the item breakdown fields contains sensitive, confidential, or staff-identifiable details, meaning compliance would impose a grossly oppressive burden on Agency resources.
- The Agency has not drawn conclusions about the requester's intent, and this decision is not based on who made the request. However, the exceptionally broad scope and level of transactional detail requested materially increase the burden of compliance.
- While transparency regarding public expenditure is recognised as important, the public value of disclosing detailed narrative descriptions for every individual transaction is limited. This is outweighed by the disproportionate effort required and the risks associated with large-scale manual redaction.
- Processing the request would require detailed examination of staff-linked purchasing activity over several years. This raises a risk of unwarranted concern or distress to staff and the accidental disclosure of sensitive contextual information.

On this basis, the Agency has decided that Section 14(1) of the FoI Act applies on this occasion.

If you have any queries about this letter, please contact us quoting the reference number above.

Yours sincerely,

MHRA Central Freedom of Information Team
Medicines & Healthcare products Regulatory Agency

Your right to complain under the Freedom of Information Act

If you are not happy with this response you may request an internal review by e-mailing foi.request@mhra.gov.uk or by writing to: MHRA Central Freedom of Information Team, 10 South, Colonnade, Canary Wharf, London, E14 4PU

Any request for an internal review must be received by us within 40 working days of the date of this letter. Please note we are not obliged to provide a review if it is requested after more than 40 working days.

If you are not content with the outcome of the internal review you may apply directly to the Information Commissioner's Office for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted our own complaints procedure. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Website: [ICO FOI and EIR complaints](#) or telephone 0303 123 1113.

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<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>