



# SFO

SERIOUS FRAUD OFFICE



## ANNUAL REPORT AND ACCOUNTS 2024-25





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# ANNUAL REPORT AND ACCOUNTS 2024-25

For the period 1 April 2024 to 31 March 2025

Accounts presented to the House of Commons pursuant to Section 6(4) of the Government Resources and Accounts Act 2000

Annual Report presented to Parliament pursuant to Section 1(15) and Paragraph 3 of Schedule 1 to the Criminal Justice Act 1987

Accounts presented to the House of Lords by Command of His Majesty

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# Statement from the Director

I am delighted to present the Annual Report and Accounts for the Serious Fraud Office for the reporting year 2024-25.

Our five-year strategy is ambitious but the progress made in this reporting period demonstrates that the SFO has the energy and commitment to deliver on it. This year has seen significant developments, from building our workforce and reducing attrition to increasing the volume, pace and rigour of our investigations; from seizing the opportunities that AI presents to leading on important reform domestically and forging enduring partnerships with jurisdictions across the globe.

The SFO has achieved more in all these areas than ever before, further establishing itself as one of the UK Government's most effective global enforcement brands and most importantly, delivering on our mission to fight complex fraud, bribery and corruption.

Just some examples; eight new investigations opened, four major executive action operations undertaken, the charging of a complex fraud case within 15 months of opening the investigation; the creation of an international anti-corruption prosecutorial taskforce; a refreshed memorandum of understanding between the SFO and our equivalent agency in Indonesia; contributing significantly to important domestic reform, including the Fisher Review on disclosure and driving the argument for the incentivisation of whistleblowers; the first ever use of machine learning to facilitate disclosure in a live criminal prosecution.

All of this progress has been made possible by the combined efforts of the entire workforce and I would like to thank every member of staff for their specific contribution. It is also right to acknowledge senior executive and non-executive colleagues who have now moved on but who made a very real contribution to our success. I also thank our partners, both in the UK and abroad, who have supported us in our work through the provision of resource to support operational activity and in ongoing co-operation with our investigative teams over the lifetime of an investigation.

The year to come will no doubt present many new challenges, some foreseen, others that will emerge in due course. I am confident that the SFO has the will, the ambition and the optimism to rise to these challenges and continue to develop and innovate in pursuit of our mission.



**Nick Ephgrave QPM**  
**Director**

Serious Fraud Office  
4 July 2025



## Statement from the Chair

As Chair of the Board, I am pleased to present this message on behalf of the SFO's Non-Executive Directors.

In April 2024, the Board welcomed the publication of a new strategy for the SFO. As the agency's operating context continues to evolve, a strong sense of direction and purpose is more important than ever.

This reporting period was a time of significant change. Most significantly, it marked the transition to a new government and new Law Officers. The SFO engaged closely with the Attorney General's Office over the year, collaborating on ways in which the department can support the government's priorities along with plans for increased productivity and agility across government.

Throughout the year, the SFO took steps to strengthen its foundations. Recognising that its expert and skilled staff are its most powerful resource, the SFO embedded new values, developed leaders' skills and brought in fresh talent through recruitment drives and secondment opportunities. The organisation also further developed its technological capabilities; the successful pilot of Technology Assisted Review and the procurement of a case management system are significant steps forward.

This annual report is an impressive account of the first steps the SFO has taken towards the ambitions set out in its strategy. I and the other Non-Executive Directors will continue to support, shape and guide the organisation as it continues that journey in the coming year.



A handwritten signature in black ink, appearing to read 'Claire Bassett', written in a cursive style.

**Claire Bassett**  
**Chair of the Board**  
Serious Fraud Office  
4 July 2025



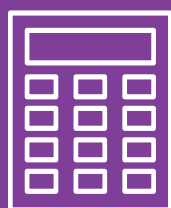
# 2024-25 Performance

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## Performance Overview

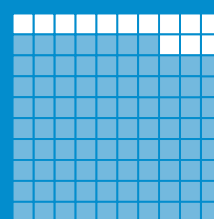
This section sets out a summary of the SFO's performance over the year. It outlines the mission, structures and objectives of the organisation, alongside a brief summary of the activities undertaken within the year to deliver against our ambitions and the risks that we have identified to success.

### SFO at a Glance



Annual budget for the year

**£99.8m**



**13.1%**

Vacancy  
rate

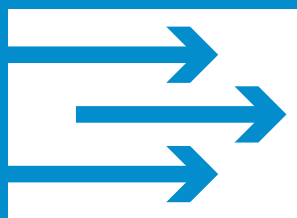
**c.35<sup>1</sup>**

Open  
criminal  
cases



**550**

Permanent, fixed  
term and backfill  
temporary officers  
working at the SFO



**c.1,450**

Referrals to our  
Intelligence division

**4**



Major multi-site operations  
to seize material across  
three cases

**>90**

Days at trial,  
across three cases



**21**

Witnesses  
supported to  
give evidence  
in court



**43.8%**

Leadership roles filled by women



**11**

People  
charged  
across two cases



<sup>1</sup> The SFO has a total caseload of c.130 cases, including criminal, civil, proceeds of crime and international assistance cases.

# SFO Structure



# Statement of Purpose and Activities

## Who we are

The SFO is a non-ministerial department superintended by the Attorney General's Office. A Framework Agreement sets out the relationship between the Attorney General, Solicitor General (the Law Officers) and the Director of the SFO.

Our core purpose is the investigation and prosecution of serious and complex fraud, bribery and corruption.

The SFO operates within the UK criminal justice system with jurisdiction over England, Wales and Northern Ireland.

## The SFO's mission

The SFO fights complex financial crime, delivers justice for victims and protects the UK's reputation as a safe place to do business. In so doing, the SFO also recovers proceeds of crimes and assists law enforcement agencies in the UK and overseas in their investigations into fraud, bribery and corruption.

## How the SFO delivers its mission

The investigation and prosecution of our cases is carried out by multi-disciplinary case teams of lawyers, investigators, forensic accountants, digital technology experts with external counsel and other specialists as required. This joint investigatory and prosecutorial case-team structure is a key component of the SFO model. Unique powers of compulsion under section 2 of the Criminal Justice Act 1987

enable the SFO to enforce the requirement of attendance at interview or the production of information<sup>2</sup> or, in certain circumstances, to apply for a warrant to enter and search premises to seize information.

The SFO will investigate cases which call for the legal powers and multi-disciplinary approach available to it. In considering whether to take on an investigation, the Director applies a Statement of Principle and considers the resources which the organisation has available to undertake an effective investigation:

The Director may investigate any suspected offence which appears to them on reasonable grounds to involve serious or complex fraud, bribery or corruption.

In considering whether to authorise an investigation the Director will take into account the actual or intended harm that may be caused to:

- The public, or
- The global reputation and integrity of the UK as an international financial centre and as a safe place to invest and do business, or
- The economy and prosperity of the UK

And whether the complexity and nature of the suspected offence warrants the application of the SFO's specialist skills, powers and capabilities to investigate and prosecute.

<sup>2</sup> Failure to comply is a criminal offence.

# Strategic Objectives

## Aims

The SFO's core responsibilities are outlined in its framework agreement with the Attorney General's Office:



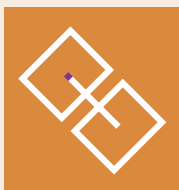
To investigate and prosecute the most serious or complex cases of fraud, bribery and corruption.



To uphold the rule of law, deliver justice for victims and recover the proceeds of financial crime.



To deter criminals and require offending companies to reform in order to protect the UK's economy and global reputation as a safe place to invest and do business.



To collaborate with partners in the UK and overseas to ensure there is no safe haven for those who commit serious financial crime.

## Strategy

In April 2024, the SFO published a new, ambitious five-year strategy. The four outcomes within it will guide the organisation's work over the coming years, providing the structure for each annual business plan. Performance will be tracked and monitored internally on a quarterly basis.





### MISSION:

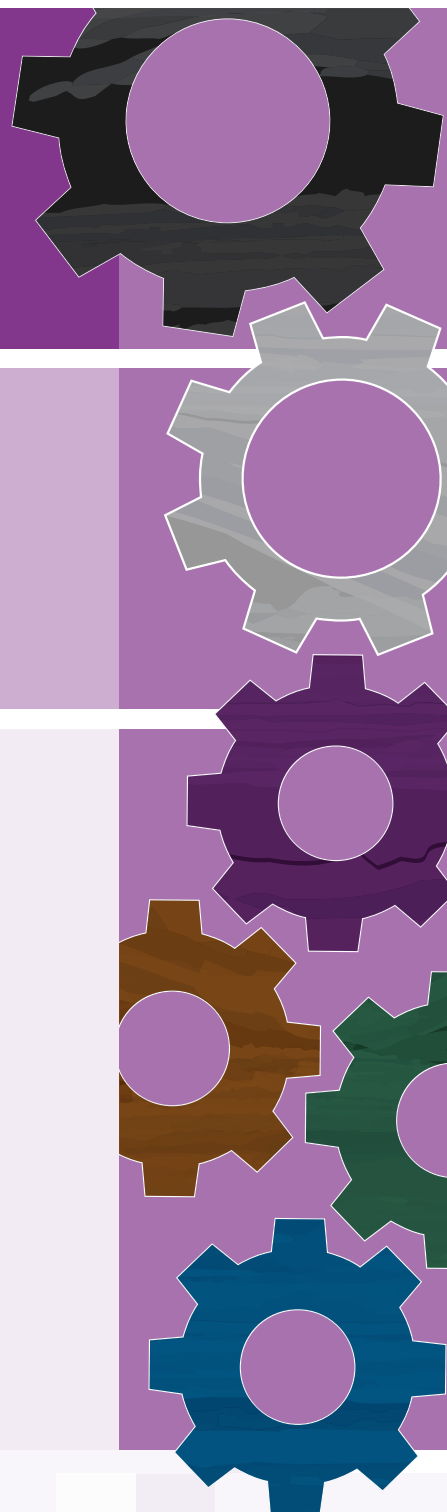
**We fight complex financial crime, deliver justice for victims and protect the UK's reputation as a safe place to do business.**

### 2029 VISION:

**We specialise, collaborate and innovate to lead the fight against serious fraud, bribery and corruption.**

### STRATEGY OUTCOMES:

-  We have a highly specialised, engaged and skilled workforce
-  We are ready and able to harness the technology and tools of a changing world
-  We combat crime effectively through intelligence, enforcement and prevention
-  We are a proactive, authoritative player in the global and domestic justice system





# Summary of Performance During the Year

2024-25 was the first year of the SFO's new strategy. The organisation laid strong foundations and took confident first steps towards delivery against each of its four outcomes.

## **We have a highly specialised, engaged and skilled workforce.**

The SFO's strategy begins with people; they are the organisation's greatest asset. During the year, we focused on ensuring that the SFO can attract and retain the experts it needs. We reshaped our Human Resources team into a People and Culture division with the skills and experience required to support a specialised, operational agency capable of investigating and prosecuting the largest and most complex cases of fraud, bribery and corruption.

We used those new capabilities to build the SFO's in-house expertise, receiving over 1,650 applications for our Trainee Investigator Programme and, for the first time, opening up new opportunities for permanent document reviewers. Over the year, our vacancy rate fell from 16.3% to 13.1% and our turnover rate fell from 16.6% to 13.2%.

We also created more opportunities for those within the SFO to develop their specialist skills and foster the collaborative, innovative culture we need to fulfil our mission. We launched a new leadership development programme for all staff at every stage of their career, which was attended by over 300 colleagues during this financial year. We updated our organisational values and published a new equity, diversity and inclusion action plan. The increase in the

employee engagement scores within the year's People Survey suggests that many of these steps are having a positive impact, although more work remains to be done. In 2025-26, we will continue to provide new ways in which our people can thrive.

## **We are ready and able to harness the technology and tools of a changing world.**

Expert, skilled specialists require effective and high-quality tools. During 2024-25, we took steps to strengthen and upgrade existing resources and set ourselves up to capitalise on new technological innovations in years to come.

We completed a ground-breaking pilot of Technology Assisted Review; initial findings suggested that use of this capability within the SFO's e-discovery platform could support teams to identify key documents faster, meet disclosure obligations, and accelerate decision-making. We also completed the procurement of a case management system. When launched, this will make it easier for the SFO to run cases as effectively and efficiently as possible.

We continued to invest in modern, efficient software, migrating staff onto a cloud-based document management system and preparing for the rollout of a new enterprise resource planning system to centralise our People and Finance information. Following

a review of project readiness, we decided to postpone the latter's full launch until early 2025-26; this was completed in April 2025.

### **We combat crime effectively through intelligence, enforcement and prevention.**

We made significant progress within our casework. We opened eight investigations during the year, made six arrests and carried out four major multi-site operations to seize material across three cases.

We brought charges against 11 people, including six in relation to allegations of corruption to benefit commodities giant Glencore's oil operations in West Africa and five in relation to the collapse of law firm Axiom Ince, just 15 months after opening the case. We are currently working hard to prepare for lengthy trials across multiple cases in the coming year.

In court, we secured a 30-month prison sentence and a £123k confiscation order in April 2024 against former Ministry of Defence official Jeffrey Cook. In May 2024, we prosecuted our two trials of this financial year, one of which resulted in the conviction of former investment manager David Kennedy for his part in a £100m investment fraud. In December 2025, Dr Gerald Smith, currently in prison for Covid loan fraud, was imprisoned for an additional 13 months for obstructing the SFO from seizing his properties on behalf of the taxpayer.

We pursued the proceeds of crime, securing over £1.3m during the year, including £1m in a confiscation order against David Kennedy's previously convicted co-defendant Timothy Schools in January 2025.

In the same month, we also made use of our first ever Unexplained Wealth Order on the same case, which was successfully obtained against Mr Schools' former wife.

We continued to review and drive the effectiveness of SFO casework. We carried on the work begun in 2023-24 to review our use of current and former e-discovery software after the identification of an encoding issue in the former and the decision to review the application of search terms within the latter.

Our Sharper, Faster Casework initiative focused on ensuring that case teams have access to robust, constructive assurance mechanisms within the investigation lifecycle. During the year, this approach supported the SFO to build strong, effective case strategies, work efficiently and – when appropriate – take informed decisions about whether to continue with investigations.

# 11

**people  
charged across  
two cases**



### **We are a proactive, authoritative player in the global and domestic justice system.**

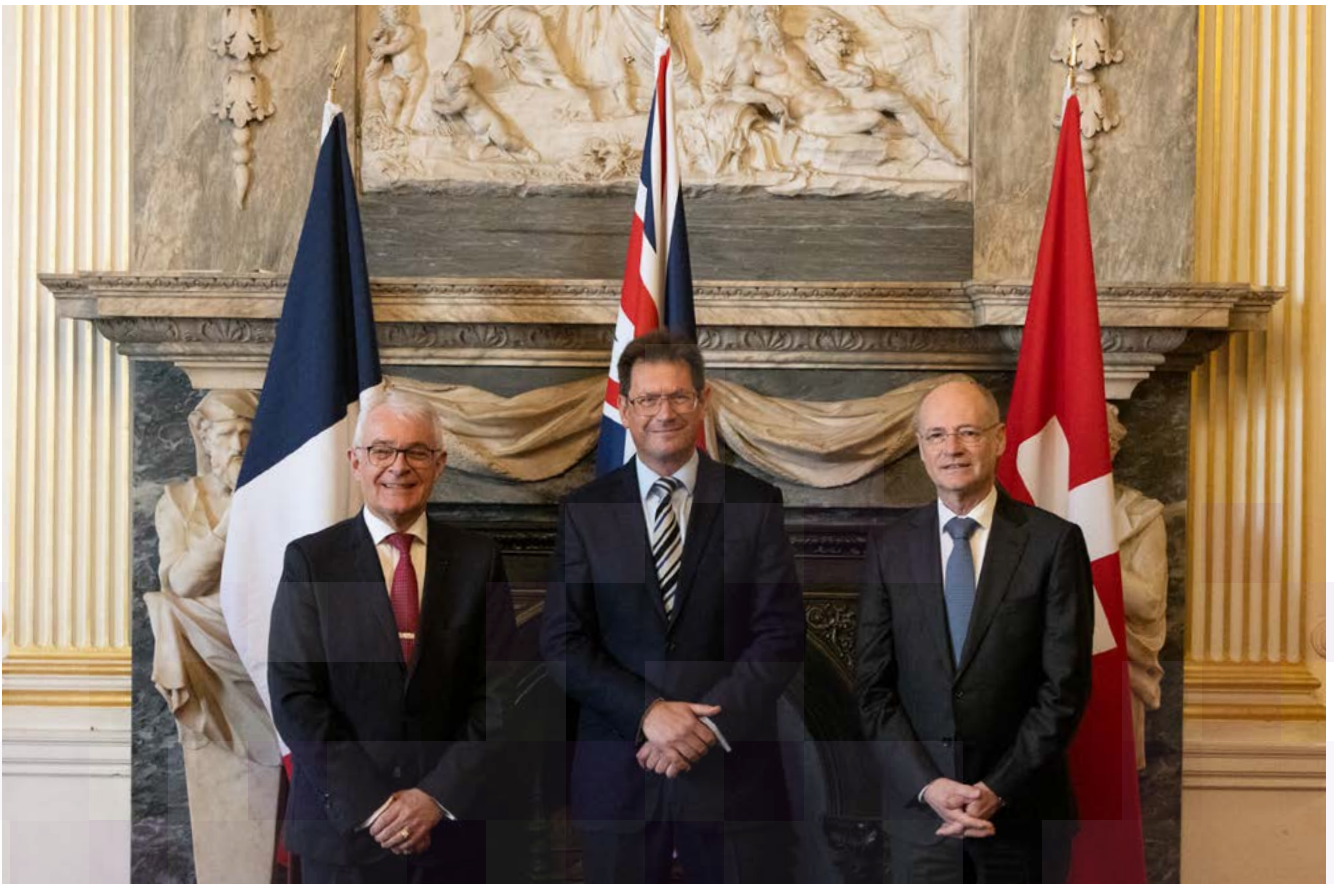
Serious fraud, bribery and corruption cases are complex, often spanning multiple jurisdictions. Cooperation with other law enforcement and prosecution agencies is therefore essential.

Over the last 12 months, we have continued to strengthen the relationships on which successful investigations and prosecutions depend. In March 2025, we created a new taskforce with France's Parquet National Financier and the Office of the Attorney General of Switzerland, emphasising the importance of working together to tackle international bribery and corruption. We met with partners in Europe and Asia and hosted delegations from all over the world to share best practice.

At home, we supported policy makers to understand the role of serious fraud, bribery and corruption within the wider justice system. We worked with Jonathan Fisher KC on his independent review into disclosure and fraud offences and welcomed his recommendations as a positive first step to reforming the outdated






criminal disclosure regime. We also led a growing debate about the potential value of whistleblower incentivisation for complex economic crime cases.





We continued to work closely with operational partners, collaborating on a new Southwark Crown Court Practice Note focused on trial preparation, management and disclosure. We made it easier for victims to report their experiences by completing the first stage of integrating the SFO's fraud referrals mechanism with the central Action Fraud portal hosted by the City of London Police.



## Risks in 2024-25

The SFO identifies risks which could affect the successful delivery of our mission and strategic objectives. Below is a description of the risks we faced as of 31 March 2025, their level of severity and an indication of their status compared to that outlined in the 2023-24 Annual Report and Accounts.

Risk category		Risk level	Risk description
NEW	Service to victims and witnesses	High	Risks arising from deficiencies and/or poor service delivery to victims and witnesses of crime.
	Legal decision-making and casework	Medium	Risks arising from a failure to take appropriate measures to meet legal or regulatory requirements.
	People	Medium	Risks arising from ineffective leadership and engagement, suboptimal culture, inappropriate behaviours, the unavailability of sufficient capacity and capability, industrial action and/or non-compliance with relevant employment legislation/HR policies resulting in negative impact on performance.
	Commercial	Medium	Risks arising from weaknesses in the management of commercial partnerships, supply chains and contractual requirements, resulting in poor performance, inefficiency, poor value for money, fraud, and/or failure to meet business requirements/objectives.
	Projects	Medium	Risks that change programmes and projects (including digital) are not aligned with strategic priorities and do not successfully and safely deliver requirements and intended benefits to time, cost and quality.
	Technological performance	Medium	Risks arising from the technological infrastructure not delivering the expected services (due to inadequate or deficient system/process development, performance or inadequate resilience).

Risk category		Risk level	Risk description
	Information	Medium	Risks arising from a failure to robustly manage data assets in accordance with cyber security standards and non-compliance with General Data Protection Regulation and Data Protection Act requirements.
	Financial	Medium	Risks arising from not managing finances in accordance with requirements and financial constraints resulting in poor returns from investments, failure to manage assets/liabilities or to obtain value for money from the resources deployed, and/or non-compliant financial reporting.
	Security	Medium	Risk arising from a failure to prevent unauthorised and/or inappropriate access to SFO systems and assets; includes the loss or compromise of sensitive information, cyber-attack and eavesdropping, leading to potential major disruption to core business operations.
NEW	Compliance	Medium	Risks arising from a failure to comply with statutory regulations or instruments from which fines, penalties or official censure may ensue.
	Governance	Medium	Risks arising from unclear or ineffective oversight or decision-making arrangements.
NEW	Reputation	Medium	Risks arising from adverse events, including systemic or repeated failures or poor quality or a lack of innovation, leading to media incidents, damages to reputation and/or destruction of trust and relations.
NEW	Property	Medium	Risks arising from property deficiencies or poorly designed or ineffective/inefficient safety management resulting in non-compliance and/or harm and suffering to employees, contractors, service users or the public.

Further information on how risks are managed can be found within the Governance Statement on page 40.

## Going concern basis

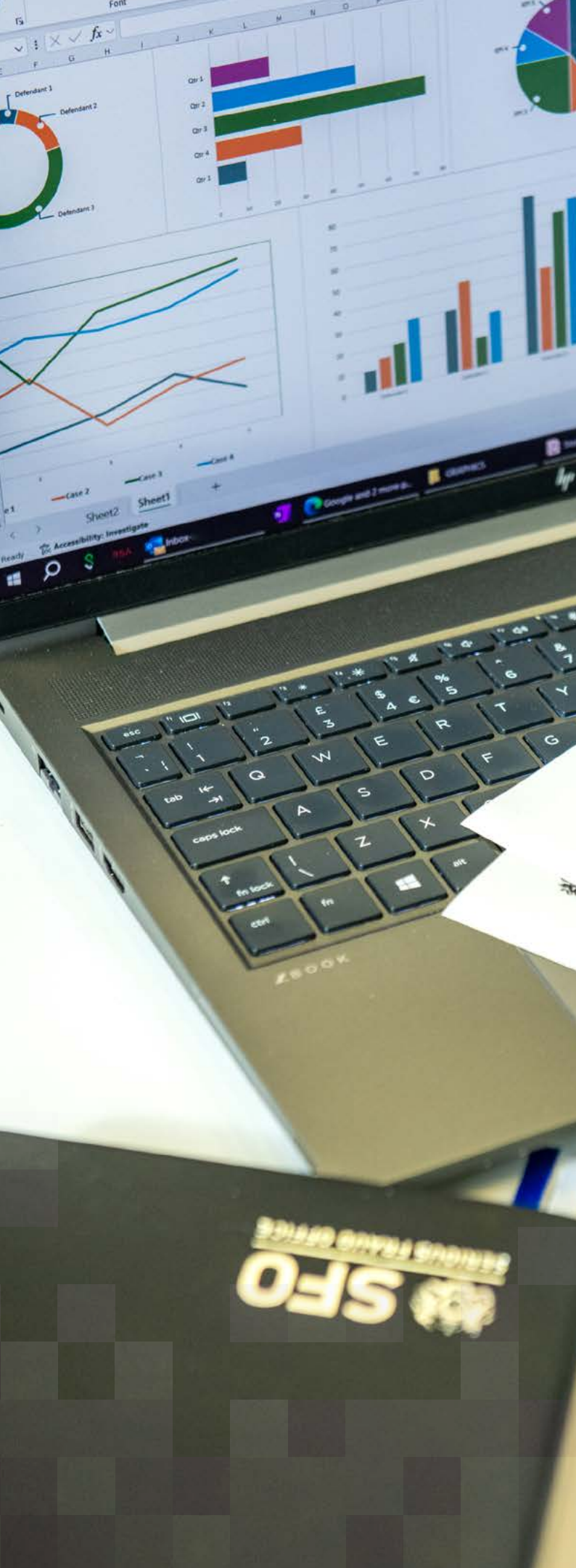
The SFO Statement of Financial Position shows a net liability as at 31 March 2025. However, these accounts are produced on a going concern basis in accordance with the Government Financial Reporting Manual. The SFO is a non-ministerial department providing services that are anticipated to continue. This is evidenced by the budget allocated at Spending Review 2025, providing the SFO with Resource DEL funding to 2028-29.

The Board reviews our going concern on an annual basis. It considers government funding, our business plan, our risk management framework and our principal risks. In common with other government departments, future financing of the SFO’s liabilities is met by future grants of supply and the application of future income, both of which are approved by Parliament each year. The SFO has secured funding for the next financial year via Spending Review 2025 and will agree future funding as part of the next Spending Review. In consequence, there is no reason to believe that future approvals will not be forthcoming. It was therefore appropriate to prepare these financial statements on a going concern basis.





# Performance Analysis



## Our Performance During the Year

This section provides a detailed examination of the SFO's performance. It includes a summary of progress on key indicators which are used to measure performance, as well as descriptions of significant milestones across all areas of the organisation in 2024-25 and a high-level overview of our financial outlook.

### Key indicators

On average,  
the time taken  
from formally  
opening an  
investigation  
to the first  
outcome is  
(2023-24: 4.4 years)

**4.3**  
years

**£1.7bn**

secured since 2015-16 to the  
end of this reporting period  
through the continued use  
of Deferred Prosecution  
Agreements (2023-24: £1.7bn)

**100%**

of cases successfully progressed past the  
'no case to answer' stage in criminal trials  
where a jury is sworn in and the judge allows  
the case to proceed to the jury at the end of  
the prosecution case (2023-24: 100%)

**100%**



of victims and witnesses  
who are called to give  
evidence are satisfied with  
the experience provided by  
the SFO (2023-24: 100%)

**12.3%<sup>3</sup>**



recovery rate  
against new financial  
orders secured on realisable  
assets, totalling £1.3m  
(2023-24: 64%)

<sup>3</sup> Of the £1.3m in financial orders, £1.1m was secured at the end of the reporting period. The value of these orders will be recovered in the next period (2025-26). The orders secured earlier in the year were recovered in full.

## Our People

**The SFO model relies on bringing together multi-disciplinary teams of experts under one roof. Together, we draw on specialist skills and expertise to deliver a shared mission.**

In 2024-25, we began working on the first pillar of our five-year strategy: We have a highly specialised, engaged and skilled workforce. We offered opportunities to those beginning new careers within the criminal justice system: our Trainee Investigator Programme had over 1,650 applicants. We also supported those already within the SFO to maintain and develop their skills, launching a new leadership development programme with modules open to everyone at every level, and designing risk management training for operational and non-operational teams.

We take pride in our people and the culture that we work together to create. During the year, we embedded the SFO's new values, Professional, Collaborative, Innovative, in policies and ways of working. We are committed to providing a supportive, inclusive environment for everyone who works at the SFO. We took steps to gather data on our readiness to tackle bullying, discrimination and harassment and launched a new equity, diversity and inclusion action plan. In December, the 2024 Civil Service People Survey results showed that our employee engagement score had increased once again and that there were significant improvements in scores related to leadership, managing change and the SFO's vision. Over the reporting period, our vacancy rate fell from 16.3% to 13.1% and our turnover rate fell from 16.6% to 13.2%.

We also undertook work to ensure that the SFO's people structures are as effective as possible. We reduced our reliance on temporary workers during the document review process, developing a recruitment campaign for 60 permanent document reviewers in a major change to the way we resource the disclosure process. We reviewed the design of our human resources function to ensure it had the capacity and capabilities required to meet the needs of the SFO, transforming it into a People and Culture division of experts in attraction, retention and inclusion. This enabled the first phase in developing a long-term people strategy, which will be completed in 2025-26. We also streamlined leadership ways of working by refreshing Executive team titles, role descriptions and reporting lines.

We continued to support staff to engage in the decisions affecting them, working closely with our three recognised Trade Unions: First Division Association (FDA), Prospect, and the Public and Commercial Services Union (PCS). Our 2024-25 pay award gave staff in Bands A to E an increase of 5% of the mean of their salary band and those in Bands F and G an increase of 6%, recognising the risk that economic pressures could disproportionately affect those in lower pay bands. We carried out a series of engagement sessions to understand people's perspectives on alternative pay models and people's experience of working at the SFO.



## Chief Investigator's Office

**The Chief Investigator's Office leads the investigation and accountancy professions within the SFO, as well as being the centre of casework assurance. It oversees the teams that support operational deployments, provides training and maintains the SFO's security operations.**

During 2024-25, the Chief Investigator's Office oversaw four major multi-site operations to seize material across three cases.

We also trialled new ways to fulfil the SFO's mission. We worked with stakeholders in other government departments, academia and the private sector to design and

test a prevention programme, laying the groundwork for a key priority of our five-year strategy. We have been working to identify ways in which the SFO can help companies to protect themselves from the threat of serious fraud, bribery and corruption, and will continue the implementation of this programme in 2025-26.

During the year, we continued to seek new and innovative ways to identify and seize the proceeds of crime. We developed a dedicated crypto cadre, increasing the agency's ability to respond to the use of cryptoassets by creating new operational guidance and training for staff.



## Intelligence

**The Intelligence division handles the sourcing and development of new cases and provides support to ongoing investigations. Cases can be generated by the SFO or by referrals from law enforcement partners, government agencies, members of the public, whistleblowers and companies who wish to make a self-report.**

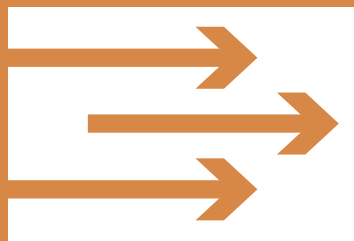
In 2024-25, the Intelligence division received c.1,450 referrals, all of which were triaged, assessed and processed. Of those, the SFO Intelligence division managed 167 whistleblowing disclosures, as defined by section 230(3) of the Employment Rights Act 1996, and/or 'making a disclosure in the public interest'.

The Intelligence division continued to expand its covert capabilities, utilising a variety of techniques to identify wrongdoing, recognising that those engaged in the most complex fraud, bribery, and corruption go

to great lengths in attempting to ensure their criminality remains hidden from law enforcement.

Analysts carried out threat assessments, analysing trends within the SFO's operating environment. The division also reviewed its ways of working and processes, focusing on ways to increase efficiency and flexibility.

At the end of October, we completed the first stage of the planned integration of the public referral process with the central reporting portal managed by the City of London Police, allowing those wishing to report an allegation of serious fraud to do so in the same place. This brings the SFO in line with all 43 national police forces and simplifies the reporting process, making it easier for victims to share their experience of alleged crime. Those wishing to report allegations of bribery and corruption may continue to do so through the SFO's online portal.



# c.1,450

referrals to our Intelligence division

## Casework

**The SFO's casework divisions investigate and prosecute serious fraud, bribery and corruption. Multi-disciplinary teams of experts work together to develop cases, review evidence, interview witnesses or suspects and bring cases before the courts. The SFO currently has an active caseload of around 130 cases, including criminal, civil, proceeds of crime and international assistance cases. In 2024-25, the SFO opened eight criminal cases, took one to court and closed eight.**

During the year, we explored opportunities to further improve the speed of case progression. Our Sharper, Faster Casework initiative focused on using casework assurance mechanisms to track progress, ensuring that informed decisions can be made at the most effective point of the case lifecycle. We also identified new ways to use technology; the successful pilot of Technology Assisted Review tested

the impact of existing machine learning capabilities within the SFO's e-discovery platform on the disclosure phase. We will continue to explore more applications of these technologies during 2025-26.

We collaborated closely with operational partners. We worked with members of the judiciary, the Crown Prosecution Service, the Financial Conduct Authority and defence representatives to develop a new Southwark Crown Court Practice Note focusing on further improving trial preparation, management and disclosure in cases of complex fraud, bribery and corruption. We carried out a refresh of our counsel panel – a process which occurs every four years – engaged with the Home Office on the ongoing rollout of Overseas Production Orders and supported the publication of guidance in relation to the new failure to prevent fraud offence.

## Proceeds of Crime and International Assistance

**The Proceeds of Crime and International Assistance division seeks and seizes the proceeds of crime to recover funds for the benefit of the UK taxpayer and, where appropriate, compensate victims of crime. The division works with jurisdictions across the world to provide mutual support in the investigation and prosecution of serious fraud, bribery and corruption.**

In 2024-25, the team secured over £1.3m in proceeds of crime. The SFO does not retain any of the funds recovered<sup>4</sup>. The division also returned over £320k as compensation to victims and secured its first Unexplained Wealth Order.

<sup>4</sup> Assets secured through cash seizure, confiscation and civil forfeiture and recovery are returned to the Home Office through the Asset Recovery Incentivisation Scheme (ARIS). In-year activity may not always correspond directly with records of receipts in annual reports' Statement of Parliamentary Supply (page 76) due to processing timelines.



## Timeline

# 2024

### APRIL

We secured a 30-month prison sentence and a £123k confiscation order for Jeffrey Cook, a former Ministry of Defence (MoD) official. This followed his conviction for misconduct in public office for taking secret payments in exchange for commissioning work from offshore consultants. Cook and a second defendant were both found not guilty of the more serious offence of corruption.

All four defendants in the Patisseries Holding PLC case entered pleas of not guilty. They will stand trial in 2026.

### MAY

We recovered over £36k in proceeds of crime from the bank account of Emmanuel Okoyomon, the former managing director of the Nigerian stateowned banknote printing company, Nigerian Security Printing and Minting Plc.

We secured the conviction of former investment manager David Kennedy for his part in a £100m investment fraud in which hundreds of people lost their savings, following a re-trial at Southwark Crown Court.

### AUGUST

We arrested a key suspect at Manchester Airport and searched his home address in relation to a suspected fraudulent timeshare services scheme believed to be operated by an organised crime network. The following month, we went on to conduct four arrests of suspected accomplices and three searches of properties across England. The SFO was assisted by the National Crime Agency, Greater Manchester Police and Hertfordshire Constabulary in these operations.



## AUGUST

We charged five people with conspiring to make corrupt payments to benefit commodities giant Glencore's oil operations in West Africa. Two of these individuals were also charged with conspiring to falsify accounting documents. The following month, we also announced charges against a further individual for conspiring to make corrupt payments and falsify accounting documents.

We obtained a Section 22 uplift to recover an additional £86k from Shaun Kiely, who was originally convicted of operating a property investment fraud in 2011.

## SEPTEMBER

We recovered a further £295k from Virendra Rastogi, now known as Vareen Kumar or Veerain Kumarr, who we successfully prosecuted for an international metal trading scam 16 years ago.

## OCTOBER

We reached a confidential settlement on a civil case related to the Eurasian Natural Resources Corporation.

## NOVEMBER

After a thorough review, we closed our criminal investigation into Bombardier Inc on the basis that other overseas authorities are best placed to progress this case to its final stages.

We launched a joint investigation with France's Parquet National Financier into suspected bribery and corruption at multi-national aerospace and defence group Thales.

We informed the Court that we believe Guralp Systems Ltd had breached the terms of the Deferred Prosecution Agreement finalised in 2019 and requested a hearing to progress the matter through the courts.



## DECEMBER



Dr Gerald Smith was imprisoned for an additional 13 months for obstructing the SFO from seizing his properties on behalf of the taxpayer.



The two defendants in an investigation into suspected fraud in relation to the activities of the Raedex Consortium entered pleas of not guilty. They will face trial in 2026.



We arrested an individual in connection with an ongoing criminal investigation into the business practices of individuals associated with Arena Television Ltd and its linked entities.



We charged five individuals, including two solicitors, with offences including fraud, forgery, and the destruction of documents, following the collapse of the law firm Axiom Ince and alleged improper use of over £60m of client money. This investigation was opened 15 months prior and is one of the agency's fastest to result in criminal charges.

# 2025

## JANUARY



We secured over £1m in criminal assets in a confiscation order against the convicted solicitor Timothy Schools. Schools was found to have hidden some of the proceeds of a £100m fraud with members of his family, disguised as loans. The money recovered will be paid back to victims. We made use of our first Unexplained Wealth Order on the same case, which was successfully obtained against Mr Schools' former wife.

## MARCH



We recovered almost £60k in laundered proceeds of crime linked to the SFO's investigation into the collapsed London-based metal trading company RGB Resources.



Three former directors of Ethical Forestry Ltd pleaded not guilty to fraud charges brought by the SFO. They will stand trial in February 2026.

## Victim and Witness Care

**The SFO depends on the victims and witnesses in our investigations; without their support, we could not bring cases to trial. Our Victim and Witness Care team provides support by explaining processes, communicating developments, signposting to specialist advice and assisting those required to give evidence at court.**

During 2024-25, we supported 40 witnesses across three trials, enabling 21 to give evidence in person. Feedback showed that witnesses attending trial continue to highly value the assistance that we are able to provide.

We continued to strengthen the ways in which we support victims and witnesses and explored new ways of communicating with the hundreds or thousands of people affected by the crimes we investigate.

In December 2024, we issued a public appeal for information about a complex timeshare services scheme believed to be operated by an organised crime network, which succeeded in reaching dozens of previously unknown potential victims. In January 2025, we rolled out new mandatory training for all staff involved with taking witness statements to further build the skills of case teams in carrying out this important stage of case development.



## Policy and Engagement

**Our Policy and Engagement team works with law enforcement agencies, government departments and external partners to ensure that the SFO has the tools, powers and support that it needs to deliver swift, effective justice.**

In 2024-25, we continued to maintain strong working relationships with partners at home and abroad, in line with the five-year strategy's ambition for the SFO to be a proactive, authoritative player in the global and domestic justice system.

We maintained the UK's role as a leader in the global fight against serious fraud, bribery and corruption. In March 2025, we founded a taskforce with France's Parquet National Financier and the Office of the Attorney General of Switzerland, affirming a shared commitment to tackling international bribery and corruption. Through the taskforce, we will build a strengthened foundation for operational collaboration between the three agencies. During the year, the Director took steps to further strengthen global partnerships, speaking at the International Anti-Corruption Conference in Lithuania, travelling to the Hague to meet with Europol and Eurojust and the Dutch Fiscal Information and Investigation Service, attending the annual International Association of Prosecutors General Meeting in Azerbaijan, meeting with the Attorney General of Singapore and visiting the Corruption Eradication Commission in Indonesia, with whom he agreed to sign a new Memorandum of Understanding to work together and exchange information. In London, the SFO hosted partners from

across the world, including delegates from Australia, Pakistan and Italy, as well as hosting an online delegation from South Africa.

In the UK, we supported legislators to develop their understanding of the threat posed by serious fraud, bribery and corruption by giving evidence to the Justice Select Committee. We also collaborated with partners beyond Whitehall, giving one of the opening addresses at the Cambridge Symposium on Economic Crime and engaging with expert civil society stakeholders. We worked with the National Crime Agency to develop the practical requirements of the new directed tasking power in the government's Serious and Organised Crime Strategy. We also continued to work closely with the judiciary; in July, the Director was invited for the first time to speak to Resident Judges across England and Wales about the work and priorities of the SFO.

Throughout the year, we supported the government's work to reform the justice system and to address challenges created by the disclosure regime. We collaborated closely with Jonathan Fisher KC's Independent Review of Disclosure and Fraud Offences, welcoming the publication of his report on Part One, 'Disclosure in the Digital Age', in March.

We led discussions about new ways to innovate within the fight against serious fraud bribery and corruption, developing a stronger understanding of the potential benefits of whistleblower incentivisation.

## Technology

**The SFO's five-year strategy demonstrates the organisation's commitment to using technology in ways that allow staff to deliver work more quickly and efficiently, enabling better operational outcomes. Teams within our IT division develop innovative technological solutions, keep the SFO secure and provide day-to-day support.**

During 2024-25, we strengthened the tools available to staff. This included migrating to an updated document management system following successful pilots in 2023-24, increasing efficiency in the SFO's operations.

We took steps to further develop the SFO's capabilities in years to come, launching and completing the procurement process for a case management system. This represents a significant transformation of how the SFO will carry out investigations and allocate resources, improving case progression and assurance. It is a key element of the SFO's new five-year strategy and was highlighted as an important operational tool in a recent HMCSI report. Work to develop and rollout the new system will continue throughout 2025-26.

We carried out a review of our current and former e-discovery software use. First, we applied a technical fix to our current platform, Axcelerate, after the identification of an encoding issue affecting how some words appeared in documents ingested into the system. For data that was ingested prior to the underlying fix being applied, we have worked through cases to apply the fix to existing data. The encoding fix has now been successfully applied to all cases impacted

by the issue. All relevant defendants across our cases in court have been informed about the fix and we will continue to share information with future defendants via pre-trial proceedings.

We are also reviewing some cases that used the previous e-discovery platform, Autonomy. The software previously used by the SFO had some specific rules that governed the way search terms had to be constructed to be used effectively on case material. The SFO, like all prosecutors, has a legal obligation to disclose material to any convicted defendant which might cast doubt upon the safety of that person's conviction and to undertake enquiries to ascertain whether such material exists. We take this obligation very seriously and are conducting multi-stage reviews of past Autonomy cases to see how search terms were constructed and used by our case teams, prioritising cases in which defendants are serving custodial sentences. Following an initial review of every relevant case, in February 2025 we confirmed – publicly and to the representatives of relevant defendants – that many cases were not affected by the issue. In some cases, further enquiries are needed; the review remains ongoing. In all cases reviewed to date, we have not identified any material which undermines the safety of any conviction.



# Transformation



**The Transformation division (previously Change Delivery division) supports the management and delivery of major internal projects that change the way the SFO operates.**

The projects taken forward as part of the Transformation Portfolio this year strengthened the organisation's ability to deliver on its mission and react to its changing environment.

We supported frontline activities by completing the roll out of new tools to support document management and by managing the secure archiving of case material. We also supported the introduction of Overseas Production Orders, in partnership with the Home Office.

The implementation of a new enterprise resource planning system continues to be a significant project. In November, the launch was postponed due to data transfer challenges. Preparations took place over

the course of the year and rollout was completed in early 2025-26.

Our 2024-25 business plan included preparations for an office move. Following the decision to prioritise operational resourcing requirements at the Autumn Budget 2024, particularly the procurement and implementation of a new case management system, the organisation was unable to complete the move. The SFO remains committed to the Government Property Strategy and continues to review accommodation options in line with its operational needs and the resources available.

Several new projects have also been scoped and started this year, including a project to strengthen our evidence review processes through developments such as Technology Assisted Review and a project to review the core learning and development offer for our operational colleagues.

## Financial Performance

The SFO's net spending is broken down into several different spending totals, for which Parliament's approval is sought. The Department's running costs are covered by the Departmental Expenditure Limit (DEL) and our provision for legal costs arising from events in year but expected to be paid in future financial years are classified as Annually Managed Expenditure (AME).

Where costs are recovered on our cases, these are shown as receipts in DEL, up to the amounts agreed by Parliament. Any amounts in excess of this are surrendered to HM Treasury. Fines and penalties not included in the Trust statement, attached to these accounts, are paid directly to HM Treasury via HM Courts & Tribunals Service.

Resource DEL budgets are also divided into Programme and Administration budgets. Programme refers to expenditure that relates directly to delivery of departmental objectives and front-line services. All other income and spending is treated as Administration, which covers administrative functions and other overheads. In order to maximise spending on front-line services, departments are set limits on Administration expenditure. These limits are not voted on by Parliament but are still treated as control totals with any breach resulting in an Excess Vote.

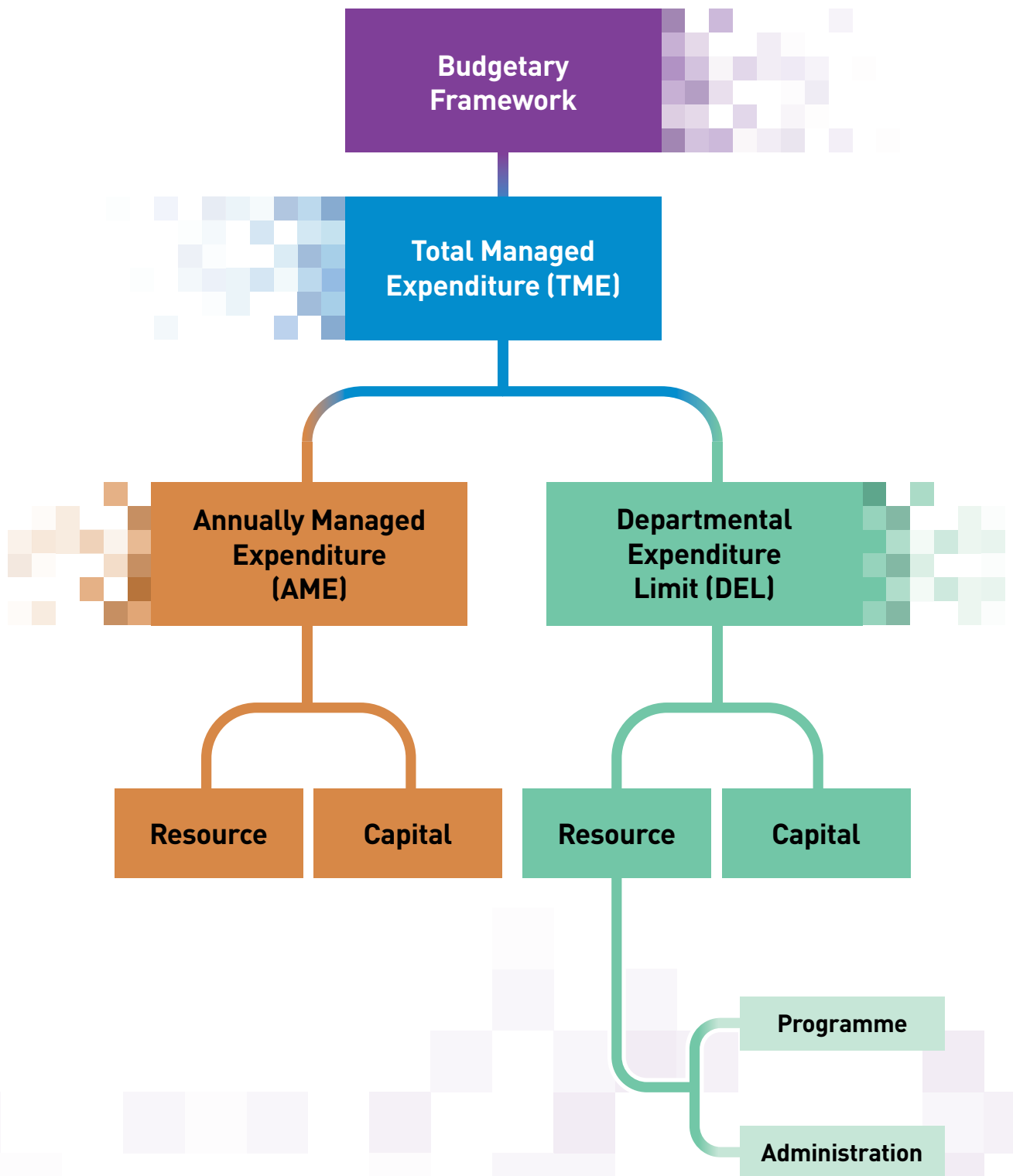
Resource AME budgets are always treated as Programme.

Departments are also set a limit on Net Cash Requirement. This is the cash funding requirement arising from Resource and Capital budgets, together with

planned movements in working capital. It is effectively the maximum amount of Parliamentary funding that the department can draw down; breaching this limit results in an Excess Vote.

Control totals are set on a net basis – there are no separate controls on income and expenditure and, subject to HM Treasury approvals on the retention of income, additional income can be offset against additional expenditure.

A further control on spending is that budgets for depreciation and impairment of assets are treated as ring-fenced. These elements of Resource DEL budgets may not be used for other spending without HM Treasury approval. However, the ring-fence is not a control voted on by Parliament.



## Where our funding comes from

Our funding comes directly from government as part of the Spending Review, which normally occurs every three to five years.

HM Treasury set limits for DEL budgets, as DEL budgets are understood and controllable. AME budgets are agreed with HM Treasury each year, as these capture spending which is more volatile or demand-led.

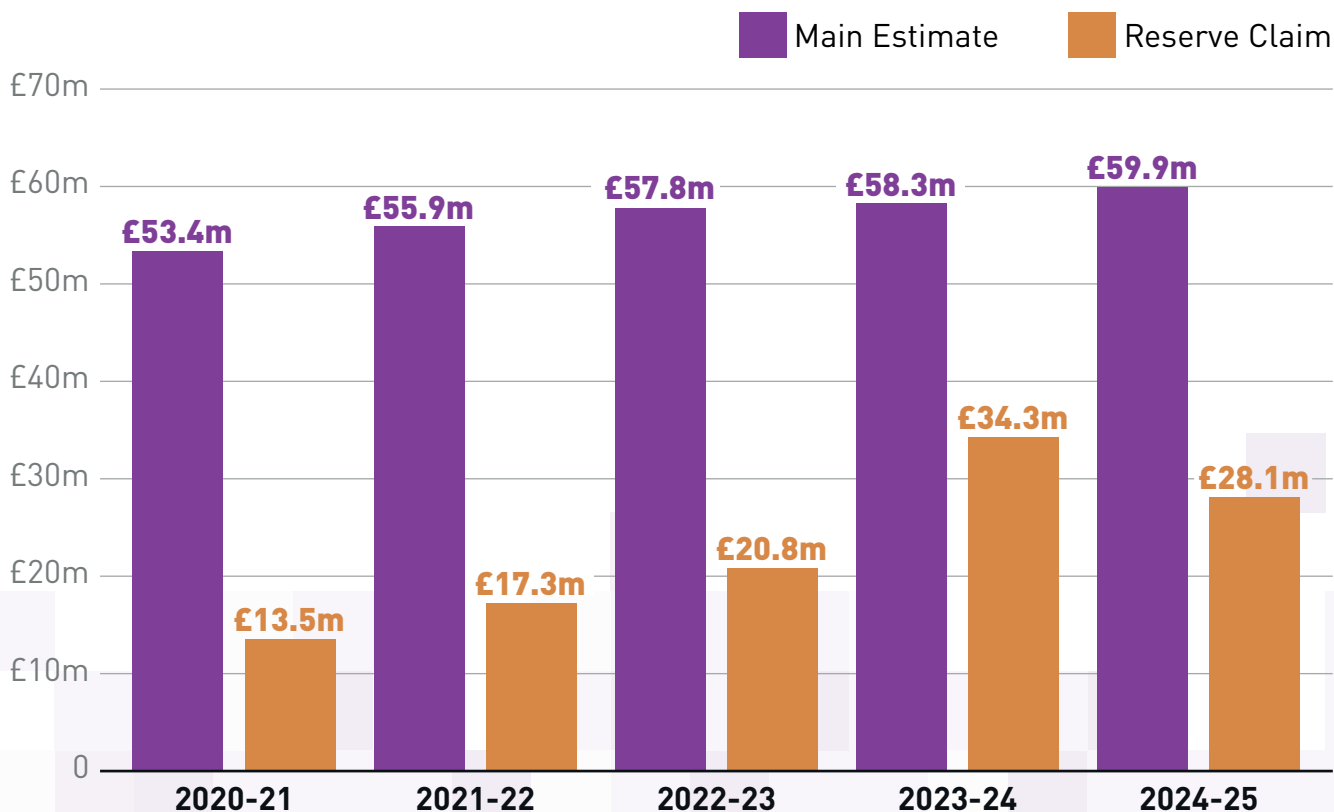
The 2021 Spending Review — and further amendments agreed through the 2024 Autumn Budget — set the SFO's financing for 2024-25. Additional funding will continue to be agreed with HM Treasury on

a year-by-year basis and confirmed in the Supplementary Estimate.

Specific control totals for the current financial year are then confirmed through Estimates, which are voted on by Parliament. There are two Estimate publications during the financial year: in May the Main Estimate sets the initial budgets for the year, whilst in February the Supplementary Estimate allows for adjustments to be made and confirms the final budgets against which outturn will be measured. If outturn exceeds the controls voted by Parliament, then this results in an Excess Vote.

The chart below shows our Resource DEL funding over the last five year period.

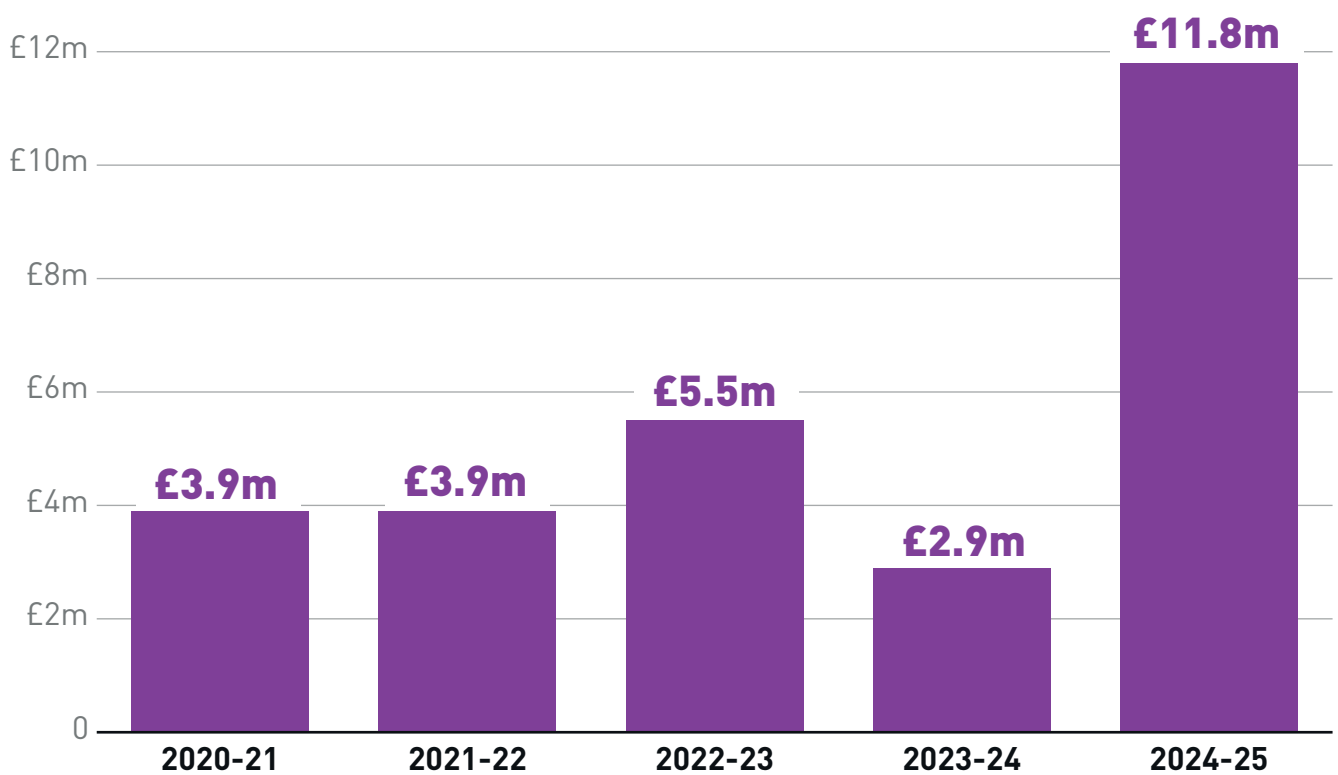
## Resource DEL funding



The net Resource DEL has increased by £28.1m since the Main Estimate was agreed. This comprises £24.3m for high-cost cases and £3.8m for accommodation costs, both agreed at the Autumn Budget 2024.

**The chart below shows our Capital DEL funding over the last five year period.**

## Capital DEL



Capital DEL was reduced by £21.2m during the Supplementary Estimate process. This reflects the surrender of IFRS16 funding originally allocated to capitalise a new office building lease but which was no longer needed following a decision in October not to move offices during 2024-25.

The core capital budget for this year of £2.4m was used to enable the SFO to continue to invest in essential IT and digital infrastructure to respond to the increasing complexity of case data and the challenges this poses for disclosure.

There is no in-year change to the AME control total.

Our summary expenditure

There were no breaches of Parliamentary control totals and we are confident that our future spending plans will continue to use a high proportion of our budget without the risk of a Parliamentary control total breach.

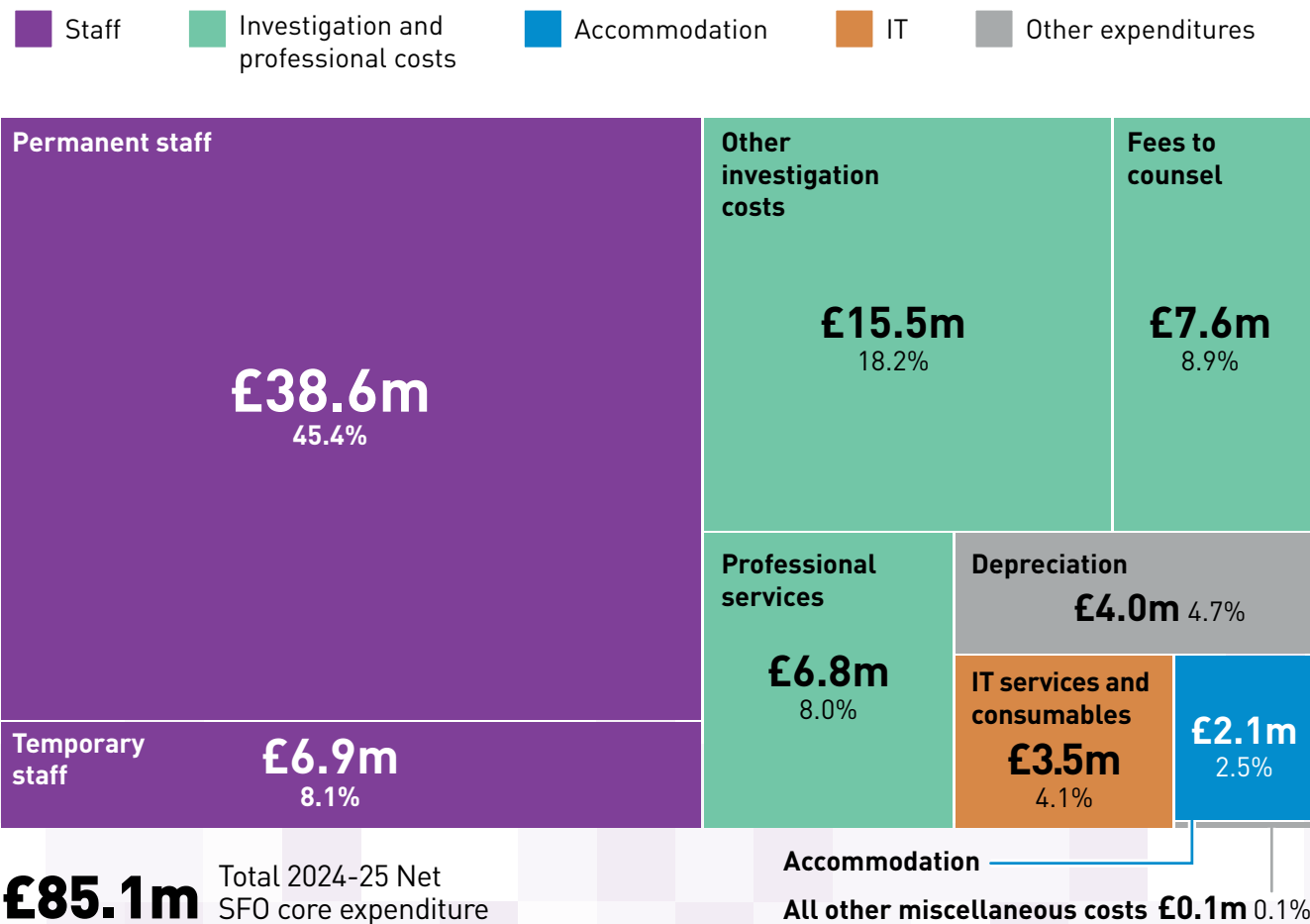
Significant variances between Estimate and outturn are discussed below.

Resource DEL

Operational expenditure			
	Funding £m	Outturn £m	Variance £m
Total RDEL	88.0	85.1	2.9

The SFO’s Resource DEL outturn for the year totals £85.1m, an underspend of £2.9m or 3.3%.

A summary breakdown of SFO expenditure is shown in the chart below. The main categories of spending are staff costs, counsel fees, accommodation and IT costs.



£85.1m Total 2024-25 Net SFO core expenditure



## Capital DEL

Capital investment			
	Funding £m	Outturn £m	Variance £m
CDEL <sup>5</sup>	2.4	2.3	0.1
IFRS16	9.4	4.3	5.1

Overall, our capital investment this year was £2.3m, which was £0.1m less than our Capital DEL funding.

Capital expenditure is in line with budget.

The SFO continues to engage in discussions about our future accommodation with the Government Property Agency. In 2024-25 we have reduced the likely remaining occupancy at Cockspur Street to 2.5 years, resulting in an underspend on IFRS16 CDEL of £5.1m.

## Resource AME

Annually Managed Expenditure (AME) outturn was -£206.8m, an underspend of £206.8m due to a reduction in our legal provisions.

## Our provisions

The existing provision in relation to civil action taken by ENRC against its former law firm Dechert, former lawyer Neil Gerrard and the SFO has reduced by £206.8m to £30.9m (page 104).

<sup>5</sup> Capital department expenditure limit.

# Sustainability

Information on SFO progress can be found at page 125.

## Contributions to the United Nations Sustainable Development Goals (SDGs)

We are committed to playing an important role in achieving the United Nations SDGs. Our remit means that we focus on Goal 16:

'Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.'

Within this goal, the SFO actively contributes to two targets:

16.5 – Substantially reduce corruption and bribery in all their forms.

16.10 – Ensure public access to information and protect fundamental freedoms in accordance with national legislation and international agreements.

## Future Plans

During 2025-26, the SFO will continue to focus on delivery against the ambitions set out in its five-year strategy. As planned at launch, this year we will prepare for a mid-point review of the strategy's content and direction, taking into account any significant or anticipated changes in the SFO's operating context.



**Nick Ephgrave QPM**  
**Accounting Officer**

4 July 2025

# Accountability Report

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The Accountability Report includes a corporate governance report, a remuneration and staff report and a parliamentary accountability and audit report. These sections reflect financial reporting and parliamentary accountability reporting requirements.

## Corporate Governance Report

### Reportable data related incidents

**44**

**Reportable data-related incidents**  
in 2024-25

**35**

**Reportable data-related incidents**  
in 2023-24

Targeted security awareness on the importance of reporting security incidents was delivered to all staff in 2024-25, leading to an increase in incidents being reported.

One personal data breach was reported to ICO (2023-24: 0).

### Auditors

The SFO's Accounts are audited by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General. No further assurance or other advisory services were provided by the auditors.

### Remuneration to auditors for non-audit work

The SFO did not pay any remuneration to its auditors for non-audit work. The notional fee for the audit of the Department's Accounts for 2024-25 was £71,000 (2023-24: £67,000), and £10,000 (2023-24: £9,500) for the audit of the Trust Statement.

# Statement of Accounting Officer's Responsibilities

Under Section 5(2) of the Government Resources and Accounts Act 2000, HM Treasury has directed the SFO to prepare for each financial year resource accounts detailing the resources acquired, held or disposed of during the year and the use of resources by the Department during the year. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of the SFO and of its net resource outturn, application of resources, changes in taxpayers' equity and cash flows for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual and in particular to:

- Observe the Accounts Direction issued by HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis
- Make judgements and estimates on a reasonable basis
- State whether applicable accounting standards, as set out in the Government Financial Reporting Manual have been followed, and disclose and explain any material departures in the accounts
- Prepare the accounts on a going concern basis

HM Treasury has appointed the Director of the SFO as Accounting Officer of the SFO. The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding the SFO's assets, are set out in Managing Public Money published by HM Treasury.

The Accounting Officer has taken all the steps that he ought to have taken to make himself aware of any relevant audit information and to establish that the SFO's auditors are aware of that information. So far as the Accounting Officer is aware, there is no relevant audit information of which the SFO's auditors are unaware.

The Accounting Officer confirms that the annual report and accounts as a whole are fair, balanced and understandable and that he takes personal responsibility for the annual report and accounts and the judgements required for determining that it is fair, balanced and understandable.

# Governance Statement

## Scope of responsibility

This statement covers the SFO's governance arrangements for the year ended 31 March 2025 for both the Departmental Resource Accounts and the SFO's Trust Statement at page 107.

The SFO was given its powers under the Criminal Justice Act 1987 and set up in 1988 as a non-ministerial department. Ministerial oversight and accountability to Parliament lies with the Attorney General.

The Director is responsible for the discharge of the organisation's functions through the SFO's Board, Executive Committee, Audit, Risk & Assurance Committee (ARAC) and other supporting governance forums. He is supported by the Chief Financial Officer

(CFO), Chief Operating Officer (COO), Director of Legal Services and General Counsel (DLS) and Director of Operations (DirOps). The COO, DLS and DirOps have direct responsibility for overseeing the organisation's corporate functions and operational work.

The Director is responsible for maintaining a sound system of internal control which supports the achievement of the SFO's aims and objectives and compliance with its policies. The Director is also charged with safeguarding public funds and departmental assets, for which he is personally responsible, in accordance with the responsibilities assigned to him in Managing Public Money.



## Governance structure

The SFO's governance arrangements are in line with HM Treasury's and Cabinet Office's Code of Good Practice for Corporate Governance. The three main governance forums are



the Board, its subcommittee ARAC, and the Executive Committee. There are also five committees and three sub-committees that support the Executive Committee in achieving the SFO's objectives. Alongside this, there are a number of supporting working groups, all of which feed into the work and responsibilities of at least one of the main governance forums.

A Framework Agreement defines the relationship between the Law Officers and the Director and was last updated in May 2024. This relationship is an essential component of our governance. The Director meets with the Law Officers regularly, in accordance with sponsorship and statutory superintendence arrangements. The Framework Agreement describes the Ministerial Strategic Board (MSB), which meets four times per year. The MSB's overarching aims are to oversee the strategic direction of the SFO and to hold the SFO to account for delivery of its strategic objectives. Other responsibilities include enabling the roles and responsibilities of the Law Officers and the Director, agreeing and supporting the SFO's engagement priorities and reviewing financial management, performance and efficiency. The MSB is chaired by the Attorney General or the Solicitor General and its membership comprises the Law Officers, the Director, the COO and/or the DirOps, the Director-General (AGO) and the Chair of the SFO Board (a Non-Executive Director). The Chief Inspector of HMCPsI attends by invitation as required. The Framework Agreement also describes Superintendence meetings, which take place at least three times a year. The purpose of Superintendence meetings is to keep the Law Officers apprised of – and allow them to scrutinise – relevant SFO casework matters. Superintendence meetings are chaired by the Attorney General or Solicitor General and attended by the Director, COO, DLS, Director General of the AGO and Director of the AGO.

The following sections set out the membership and arrangement of the SFO's key governance structures.



## The Board in 2024-25

Due to staff changes, membership of the Board changed during 2024-25. At the end of the reporting period, the Board was chaired by a Non-Executive Director on an interim basis and membership comprised the Director, CFO, COO, DLS, DirOps and the three other Non-Executive Directors.

### Membership as at 31 March:



**Claire Bassett,**  
Interim Chair and  
Non-Executive Director



**Nick Ephgrave QPM,**  
Director



**Caroline Firstbrook,**  
Non-Executive Director



**Tanya de Jager,**  
CFO



**Emma Luxton,**  
Interim DirOps



**Simon McKinnon CB CBE,**  
Non-Executive Director



**Graham McNulty QPM,**  
COO



**James Thomson CBE,**  
Chair of ARAC and  
Non-Executive Director



**Matthew Wagstaff,**  
Interim DLS General Counsel

## The Board:

The Board is advisory and supervisory, monitoring the implementation of the SFO's strategic objectives and providing constructive challenge to the Director and the Executive Committee. The role of the Board was reviewed during the reporting period.

The Board is responsible for approving:

- The SFO's vision, mission, direction and values
- The SFO's budget for the coming year
- The SFO's strategic priorities
- The SFO's annual business plan
- SFO corporate governance documents relating to the Board and its subcommittees

The Board is responsible for supporting, scrutinising and advising on:

- Strategic direction: Monitoring progress against the organisational strategy and annual business plan
- Financial management: Ensuring the Director is meeting his obligations as Accounting Officer, contained within Managing Public Money. This includes recommending the Accounting Officer sign the Annual Report & Accounts, including the annual Governance statement (after an endorsement from the ARAC)
- Development and use of resources: Providing independent, effective and robust challenge and support to the

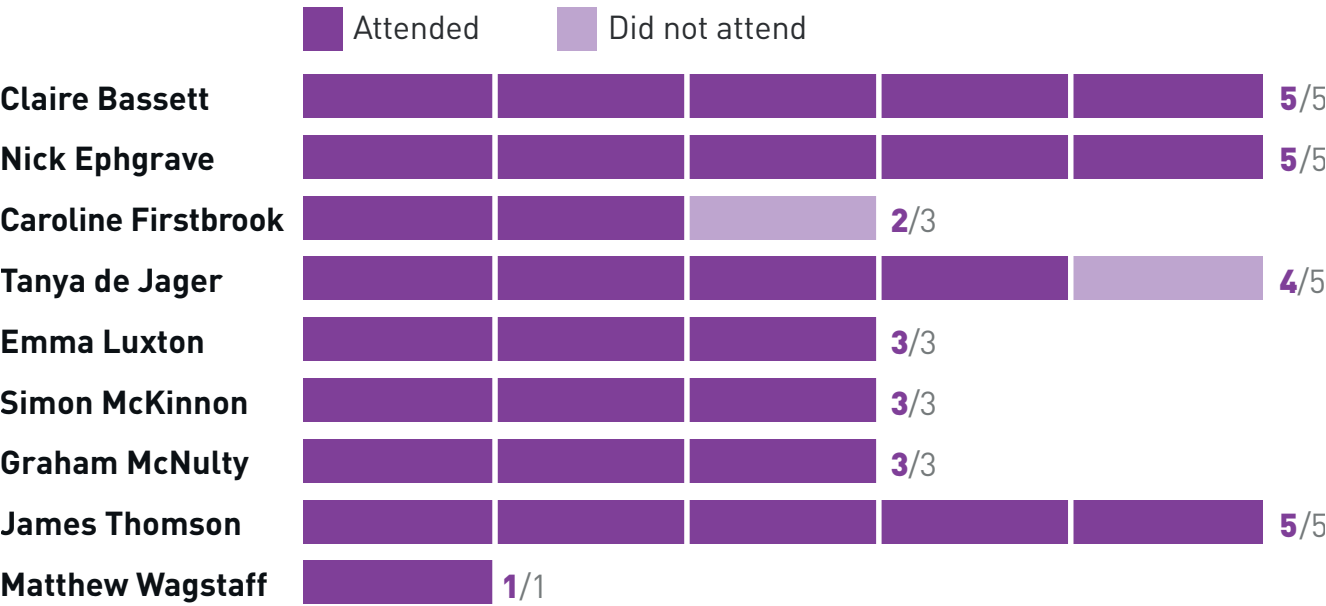
Executive team as appropriate whilst holding Executive members to account for delivery

- Risk and controls: Ensuring that a sound system of risk management, governance and internal control is maintained
- Performance: Ensuring functions are performing effectively, efficiently and delivered in an ethical manner

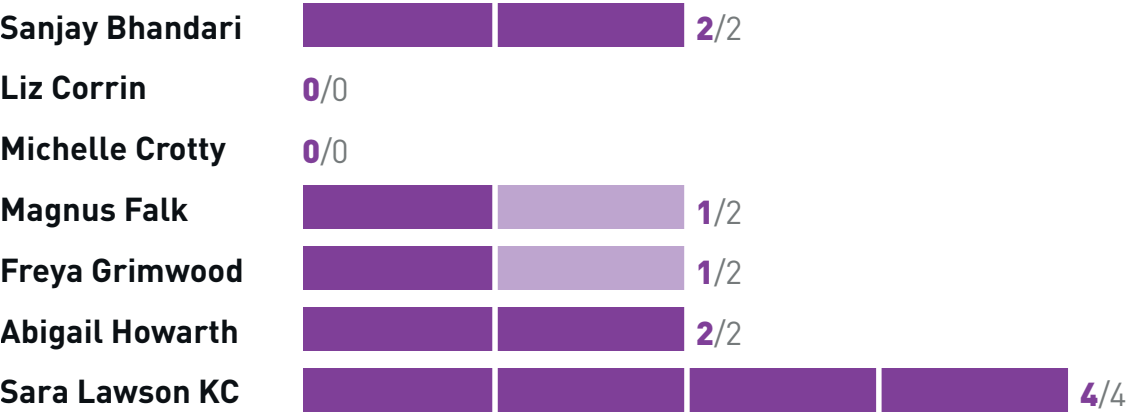
It aims to reach decisions by consensus but in exceptional cases a decision may be taken by the Director alone because of his ultimate personal responsibility for the SFO as Accounting Officer.

The Cabinet Office and HM Treasury's Code of Good Practice for Corporate Governance cites having a nominations committee as good practice. Because the SFO is a small, non-ministerial department, the Board does not consider that a separate nominations committee is necessary. Instead, the Board carries out the nominations and governance function itself.

Board attendance



Previous Board members:



This graph lays out attendance of Board members over the year<sup>6</sup>.

<sup>6</sup> Board members joined and left the committee during the year, affecting the total number of meetings that they could attend.

## Executive Committee

The Executive Committee, comprising the Director, COO, DLS and DirOps, is the principal senior management authority responsible for delivering the SFO's strategic plan effectively, efficiently and economically through its business planning process.

During the reporting period, the Executive Committee carried out a review of Executive team functions and titles: the roles of 'Chief Capability Officer', 'Chief Operating Officer' and 'General Counsel' were replaced by 'Chief Operating Officer', 'Director of Operations' and 'Director of Legal Services and General Counsel' respectively. As part of this review, the reporting line of the Chief Investigator's Office moved from the COO to the DLS.

The Executive Committee:

- Sets organisational strategy
- Approves policy and positions
- Makes decisions on organisational and strategic issues impacting the SFO's staff reputation and effectiveness
- Makes decisions on issues escalated from a sub-committee
- Discusses and makes decisions on matters as suggested by an Executive Team member and with the agreement of the Chair
- Provides regular oversight of organisational performance, risk and finances

The Executive Committee aims to reach decisions by consensus. In exceptional

cases a decision may be taken by the Director alone because of his ultimate personal responsibility for the SFO as Accounting Officer.

## Delegated Committees

The following committees have delegated authority from the Executive Committee.

**The Risk and Assurance Committee** is an Executive-level group chaired by the Director. Membership comprises the chairs of the four committees with delegated authority, the CFO and the Head of Strategy Group. It provides organisational-wide oversight of risk and issue management and assurance. It has one sub-committee: the Health & Safety Committee oversees the delivery of the SFO's Health & Safety Policy and compliance with statutory obligations.

**The Operations Committee** is chaired by the DirOps. It is responsible for governance and oversight of all operational activity and relevant working groups responsible for effective case progression, operational guidance and training and organisational learning. The Operations Committee ensures that all operational activity is conducted lawfully and in accordance with the DSFO's Statement of Principle.

**The People Committee** is chaired by the COO. It is responsible for ensuring that the SFO has a highly specialised, engaged and skilled workforce. It makes sure that the SFO has the right capacity, resource and expertise to deliver its mission and that the SFO's values and behaviours are embedded within the organisation. As part of these

responsibilities, it tracks progress against the SFO's equity, diversity and inclusion action plan.

It has two sub-committees. The Learning & Development Committee oversees and supports the identification and delivery of coherent operational, non-operational and professional training programmes and processes. The Recruitment Committee monitors and prioritises recruitment campaigns, assessing the scheduling of recruitment and considering and amending necessary recruitment policies.

**The Portfolio Committee** is chaired by the DLS. It oversees the effective assurance and delivery of the SFO's Transformation Portfolio, ensuring that it remains focused on achieving its objectives and realising the benefits associated with SFO's investment in major change and improvement.

**The Technology and Business Engagement Committee** is chaired by the Chief Technology Officer. It oversees the digital, data and technology strategy for the SFO and provides authority and guidance as required to ensure its delivery. It also ensures that the SFO's approach and solutions are underpinned by the requirements of the business and are fully aligned to its strategic objectives.

## Audit, Risk and Assurance Committee (ARAC)

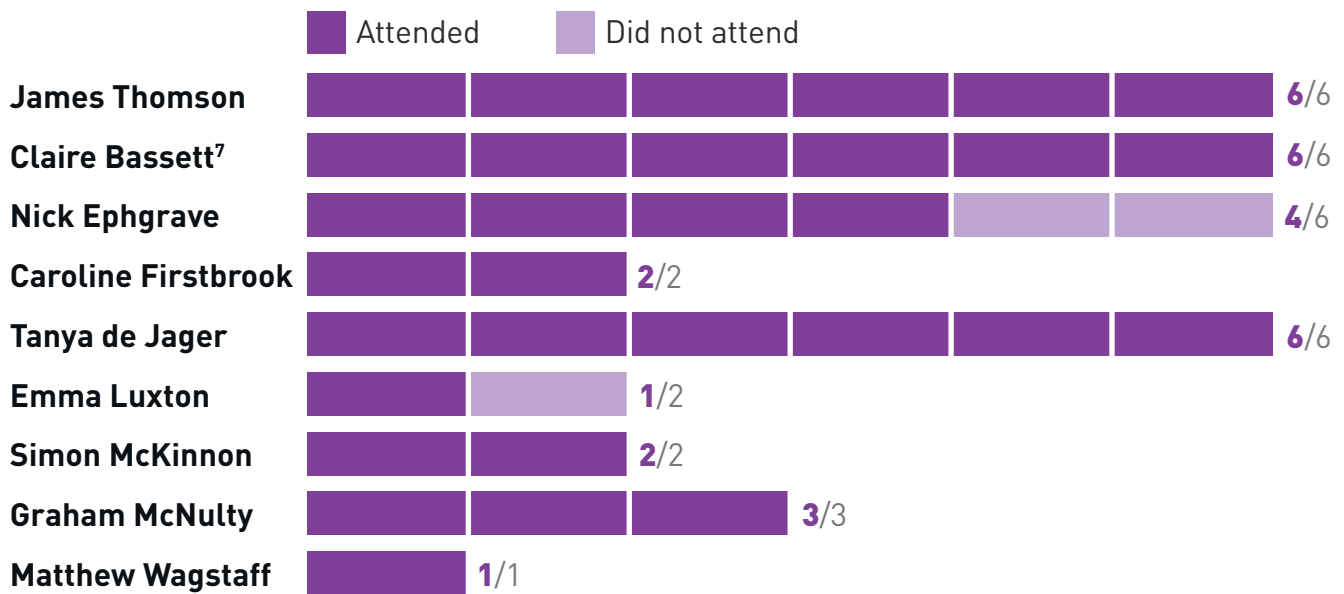
ARAC is chaired by a Non-Executive Director and membership comprises the Director (in his capacity as Accounting Officer), two other Non-Executive Directors, the CFO, COO, DLS and DirOps. Other attendees who receive standing invitations for each meeting

include the Chair of the Board and the Head of Strategy, Planning, Performance and Risk. Representatives from the Government Internal Audit Agency (GIAA), HM Crown Prosecution Service Inspectorate (HMCPSI) and the National Audit Office (NAO) provide ARAC with the independent assurance to discharge its responsibilities appropriately.

ARAC supports the Director in discharging his role as Accounting Officer. It reviews and assesses the reliability of the assurances that the Director and Executive Committee receive. ARAC oversees the organisation's internal and external audit arrangements, plans, results, and management responses. It also considers the adequacy of the SFO's risk assessment and risk management procedures.



## ARAC attendance



## Previous ARAC members:



This graph lays out attendance of ARAC by Non-Executive and Executive Board members over the year<sup>8</sup>.

## Other forums

### Intelligence Division Oversight Committee

The Oversight Committee provides the DirOps and her team with oversight of operations within the Intelligence division,

prioritising for Case Evaluation Boards as necessary and aligning appropriate resources across operational divisions.

<sup>7</sup> During the reporting period, membership of ARAC was reviewed in line with the Audit Committee Handbook guidance on maintaining adequate assurance mechanisms between ARAC and Board. The terms of reference were amended to reflect the Chair of the Board's role as a standing attendee.

<sup>8</sup> ARAC members joined and left the committee during the year, affecting the total number of meetings that they could attend as a result.

### Case Evaluation Board (CEB)

CEBs support the Director to decide to open or decline to open an investigation, as well as to decide to prosecute or close/discontinue a case. There are four CEB types which consider:

- The opening of a case
- The closure of a case pre-charge
- The charging of a case
- The discontinuation of a case post charge

Core members of the CEB are the Director, COO, DirOps, DLS, the relevant operational Head of Division, the Case Controller (if appointed), Associate General Counsel, the Communication team and the digital forensics and e-discovery teams.

### Case Review Meetings (CRM)

CRMs are chaired by the Head of Division with responsibility for the case in question and take place at least every six months. The purpose of the CRM is to ensure that sound judgement and appropriate investigative and legal expertise are being brought to bear on cases, and that cases are progressing in an appropriate manner in compliance with all relevant obligations and legal and operational guidance.

## Risk management and internal control systems

The SFO has a multi-layered approach to identifying and managing potential risks to the organisation which relies on clear leadership and delegating authority to appropriate levels. Each Head of Division is accountable for risk and risk mitigation in

their respective divisions.

The Board and Executive Committee members lead on the SFO's risk management, supported by the Risk and Assurance Committee and the four delegated committees. Within the Executive Committee, the DLS takes a lead role on risk and assurance and reports directly to the DSFO on its management.

The SFO has a risk management policy which is aligned to the HM Treasury Orange Book. It sets out the corporate approach to managing risk and the organisation's expectations and standards.

The SFO continued to strengthen its approach to risk management during the reporting period, developing additional resources and training for staff.

The SFO's risk profile as of 31 March 2025 are outlined on page 14.

## Risk registers

The SFO has three tiers of risk register:

- **The principal risk register:** This sits at the highest level of the organisation and consists of significant risks that have the potential to disrupt the SFO's ability to achieve its mission, goals, aims or objectives
- **Functional risk registers:** These are overseen and managed at an intermediate level by the four delegated committees or areas of the business with a particular remit

- **Local risk registers:** Local teams, projects and cases have a risk register. Where aggregated case risks are identified, they are escalated up to the relevant delegated committee

## Risk appetite

The SFO's risk appetite is measured in accordance with the standards, requirements and criteria outlined within the HM Treasury Orange Book. We use a linear five-bar scale to measure actual levels of risk against what is deemed acceptable by the Board. Our appetite thresholds are formally reviewed by the Risk and Assurance Committee each year and whenever a significant change in environmental or risk conditions occurs. This process ensures that organisational appetites reflect the Board's willingness to accept and tolerate changing risk conditions.

## Functional standards

Where appropriate, the SFO maintains compliance with relevant government Functional Standards, which are designed to promote consistent and coherent working within government organisations.

## Security assurance

The SFO's security programme delivers continuous protective security improvements with the aim of achieving full compliance with mandated government security standards.

The programme includes addressing recommendations from security assessments, providing information and

security assurance for new and existing services or solutions and prioritising organisational learning. By investing in a full review and update of security policies, clarifying role definitions, responsibilities and accountability and the use of mandatory in-person inductions, we can ensure that SFO assets (people, information, systems and property) are appropriately protected.

The SFO's security education and awareness plan includes:

- The delivery of information handling training to all staff to ensure information assets are classified and managed according to the Government Security Classifications Policy
- Access to industry standard cyber security awareness training for all staff provided by the City of London Police
- Strategic security training options for senior leaders and the testing of strategic cyber resilience and business continuity plans

The SFO's Departmental Security Unit provides expert protective security advice, working collaboratively with supporting agencies to strengthen the SFO's security posture. This year, the team focused on developing an insider threat programme to reduce the risk of potential harm caused by the misuse of SFO information and assets, reviewing the conflicts of interest policy and embedding cyber security capabilities through GovAssure and Secure by Design, both of which are cross-government assurance structures. The organisation also launched a new Technology Assurance Group to manage information risks arising

from the use of new technology.

## Casework assurance

The SFO's Operational Handbook defines the organisation's casework assurance mechanisms. A specific 'Casework Assurance' chapter sets clear expectations for staff on the processes to follow and the points at which casework decisions will be scrutinised. The SFO works continuously to strengthen and improve its casework assurance mechanisms.

## Register of interests

Senior managers within the SFO, including the Non-Executive Directors, are required to declare any interest.

Details of Board members' declarations of interest can be found on our website. Note 15 to the accounts, page 106, confirms that no member of the Board, including Non-Executive Directors, has any related-party interests and no conflicts of interest or potential conflicts of interest have been identified.

### Departmental assurance process on management of interests and business appointments

The SFO has a policy for the declaration and management of interests in place for all staff. This policy aims to ensure that all staff are able to recognise any potential conflict of interest and ensure that this does not affect or appear to allow their judgement or integrity to be compromised. The policy exists to protect the SFO and its investigations and prosecutions and adheres to the requirements of the Civil Service Management Code (section 4.3). It also

ensures that any outside employment held by senior civil servants does not present a conflict of interest.

In particular:

- All staff are required to complete a 'Register of Interests' form as part of the SFO recruitment checks, whether they have a conflict of interest or not
- All staff are required to re-submit the Register of Interest form whenever their circumstances change
- All staff must declare any new conflicts as part of the annual security appraisal process or if circumstances change
- All staff are required to declare conflicts before any access is granted to case information once they are assigned to a SFO investigation
- When an interest is declared, it must be risk assessed and a mitigation strategy must be agreed. All decisions must be recorded on the Register of Interests

## Internal Whistleblowing

Whistleblowing is covered by the SFO's 'Raising a concern (Whistleblowing)' policy which is available to all employees via the SFO intranet. The policy sets out how people can raise a concern and has a section specifically covering whistleblowing with a link to the Public Interest Disclosure Act (PIDA) 1998.

The SFO is committed to ensuring high standards of conduct in all that it does. We believe our people share this commitment

and understand that if they suspect wrongdoing, they have a responsibility to speak up.

We are committed to:

- Ensuring everyone understands their responsibility and feels able to speak up when they see something that does not feel right
- Listening to those who raise a concern and treating them with respect
- Handling concerns responsibly, professionally and in a positive manner
- Ensuring those raising a concern are afforded protection as detailed in the procedure
- Supporting those involved

## Complaints about the organisation to the Parliamentary Ombudsman

The Parliamentary Ombudsman has not received any complaints regarding the SFO in the financial year.

The Parliamentary Ombudsman allows victims to exercise their right to complain where their needs are not being met under the Victims' Code.

## Inspection

HMCPsi has a statutory duty to inspect the Crown Prosecution Service and the SFO. By providing independently assessed evidence, HMCPsi inspections drive improvement and build public confidence

in the criminal justice process. HMCPsi's inspection programme is set out in its annual business plan.

During 2024-25, HMCPsi planned to undertake one inspection of the SFO. Due to resourcing constraints within the inspectorate, this inspection was deferred to 2025-26.

In April 2024, the report of an inspection into disclosure carried out during the previous reporting period was published. It made six recommendations, focusing on changes to the SFO's guidance and disclosure review processes, the management of Legal Professional Privilege material, the incentivisation of Disclosure and Deputy Disclosure Officers and the need for the government to consider how the SFO is funded. Work to deliver against these recommendations was included within the SFO's business planning process.

During the reporting period, the SFO has continued to work closely with HMCPsi through the inspectorate's attendance at ARAC and regular meetings with SFO senior leaders. The SFO provides detailed updates on progress to deliver recommendations from past inspections and feeds into HMCPsi's annual planning process, which considers topics for future inspections.

## Effectiveness of the risk management and governance framework

The Director, as Accounting Officer, is responsible for reviewing the effectiveness of the system of internal control. His review of its effectiveness is informed by the work of the internal auditors, quality assurance and comments made by the external auditors in their Audit Completion Report and other reports. The Head of Internal Audit (HIA) provides an annual report and opinion on the adequacy and effectiveness of the SFO's framework of governance, risk management and controls. The SFO internal audit function is provided by the GIAA, an executive agency of HM Treasury.

The annual internal audit opinion is a key element of the assurance framework, which the Accounting Officer needs to inform his annual Governance Statement. It does not detract from the Accounting Officer's personal responsibility for the framework of governance, risk management and control, on the effectiveness of which he takes assurance from his senior management and format controls, as well as from internal audit.

The SFO Annual Opinion and Report covered the period 1 April 2024 to 31 March 2025. The Head of Internal Audit issued an annual opinion of Moderate. This means that some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management and control. During 2024-25, GIAA considered the work undertaken by HMCPSI to assess where each party can place reliance on each other's work and this working relationship will continue during 2025-26. GIAA has ensured that the

agreed audit plan was reviewed, prioritised and delivered. The planned internal audit programme, including revisions to the programme during the course of the year, were reviewed and endorsed by the ARAC and the Accounting Officer. GIAA has delivered a proportionate programme of internal audit engagements in 2024-25 which includes reviews of leadership, governance and project management.

The arrangements set out in this Governance Statement are adequate and meet the requirements set out in Managing Public Money and the Code of Good Practice for Corporate Governance, as they apply to the SFO. In line with recommendations received from the audit into governance during the reporting period, the SFO has reviewed its approach to Board Effectiveness Evaluation. The next evaluation, which will follow the updated process, is planned for Q2 of 2025-26. Data reported to the Board is based on existing SFO systems such as the central reporting database which are accurate and fit for purpose. Papers submitted to the Board during the year include the annual report of the ARAC on its activity, quarterly reports on performance and regular reports by the COO, DLS and DirOps. ARAC conducts a regular assessment of its arrangements.

The Board and ARAC have advised the Director on the effectiveness of the system of internal control. There is a continuing plan to address weaknesses and make sure the system is continuously improved. We continue to take action on the following:

- Regular reports by the internal auditors, based on the annual internal audit plan, and in line with the Government Internal



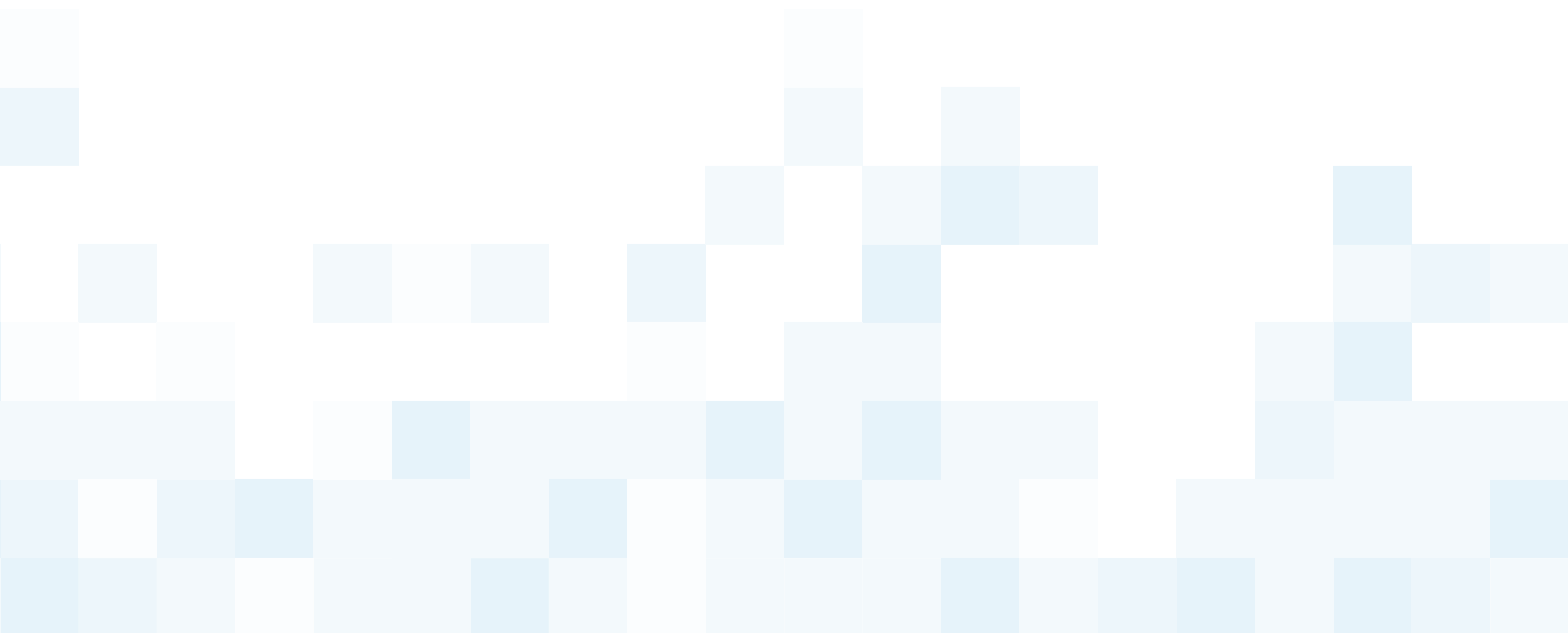
Audit Standards, together with any recommendations for improvement

- Improved business and strategic planning processes
- Improved data security procedures and supporting communications
- Regular reports from the chair of the ARAC to the Board
- Regular advice on the effectiveness of the system of internal control



**Nick Ephgrave QPM**  
**Accounting Officer**

4 July 2025



# Remuneration and Staff Report

## Remuneration

### Service contracts

The Constitutional Reform and Governance Act 2010 requires Civil Service appointments to be made on merit on the basis of fair and open competition. The Recruitment Principles published by the Civil Service Commission specify the circumstances when appointments may be made otherwise.

Unless otherwise stated below, the officials covered by this report hold appointments which are open-ended. Early termination, other than for misconduct, would result in the individual receiving compensation as set out in the Civil Service Compensation Scheme.

Further information about the work of the Civil Service Commission can be found at [www.civilservicecommission.org.uk](http://www.civilservicecommission.org.uk)

### Remuneration policy

The remuneration of senior civil servants is set by the Prime Minister following independent advice from the Senior Salaries Review Body.

In reaching its recommendations, the Review Body considers:

- The need to recruit, retain and motivate suitably able and qualified people to exercise their different responsibilities
- Regional/local variations in labour markets and their effects on the recruitment and retention of staff

- Government policies for improving public services including the requirement on departments to meet the output targets for the delivery of departmental services
- The funds available to departments as set out in the government's departmental expenditure limits
- The government's inflation target

The Review Body takes account of the evidence it receives about wider economic considerations and the affordability of its recommendations. The Director's salary is linked to that of a High Court Judge.

### Remuneration committee

The remuneration of senior civil servants (SCS) is determined in accordance with the report of the Senior Salaries Review Body.

The SFO's SCS Pay Committee meets annually to consider pay increases and bonus payments in accordance with these recommendations.

The committee is chaired by the Director and consists of two Non-Executive Directors and a senior HR professional from another government department.

### Performance appraisal

Performance management of staff below the SCS is covered by the SFO's performance appraisal system. The system supports all staff in improving their performance through continuous dialogue between managers and staff. It provides a framework for conversations about objective setting, how people have performed against

their objectives, and what development needs they have. Bonuses can be paid in-year to individuals to reward work on particularly demanding tasks or situations. The 2024-25 bonus budget was utilised in full for in-year bonus awards.

### Senior official appointments

On the 15 April 2024, Freya Grimwood was appointed as Interim Chief Capability Officer following the departure of Michelle Crotty on 12 April. She joined the SFO in 2023 from the Ministry of Justice, bringing experience from the Attorney General's Office and Foreign, Commonwealth and Development Office. She remained in the interim role until September, when Graham McNulty was appointed as the permanent Chief Capability Officer (later amended to COO). Following this, she returned to her permanent role as Head of Strategy Group.

Graham McNulty joined the SFO on 16 September. He spent seven years working on the Metropolitan Police's Economic Crime Command before becoming Chief Officer of the Met's response to fraud and serious and organised crime. From 2016-2023 he held the position of Deputy Assistant Commissioner at the Met, leading the local policing portfolio across London's 32 boroughs and then its specialist crime portfolio.

On 15 April 2024, Tanya de Jager was appointed as Chief Financial Officer following the departure of Liz Corrin on 5 April. She is a qualified chartered accountant and benefits from nine years' experience at HM Treasury, where she most recently held the position of Deputy Director for Exchequer Funds and Accounts and Treasury Accountant.

On 23 September 2024, Emma Luxton was appointed as Interim Chief Operating Officer (later amended to Interim Director of Operations) following the departure of Abigail Howarth on the same day. Before becoming Head of Division B in June 2024, she was Head of the Proceeds of Crime and International Assistance Division and previously a Case Controller. Recruitment of a permanent DirOps will take place in 2025-26.

On 1 February 2025, Matthew Wagstaff was appointed as Interim Director of Legal Services and General Counsel following the departure of the General Counsel, Sara Lawson KC on 31 January 2025. He joined the SFO in 2012 where, prior to his current role, he was an operational Head of Division. Before this, he was the Deputy Head of Fraud at the Crown Prosecution Service for three years and previously held similar positions at the Solicitor's Office of HM Customs and Excise and the Revenue and Customs Prosecutions Office.

## Remuneration (including salary) and pension entitlements

This information has been audited.

The following sections provide details of the remuneration and pension interests of the SFO's senior management (i.e. Board members) during the year.

## Non-Executive board members' remuneration

Name and title	Salary £000		Benefits in Kind (to nearest £100)		Total £000	
	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24
<b>Claire Bassett</b> Non-Executive Director and Interim Chair	35-40	15-20 (20-25 FYE)	-	-	35-40	15-20 (20-25 FYE)
<b>Sanjay Bhandari</b> Non-Executive Director	20-25	10-15	-	-	20-25	10-15
<b>Magnus Falk</b> Non-Executive Director	20-25	10-15	-	-	20-25	10-15
<b>Caroline Firstbrook</b> Non-Executive Director	5-10 (15-20 FYE)	-	-	-	5-10 (15-20 FYE)	-
<b>Simon McKinnon</b> Non-Executive Director	5-10 (15-20 FYE)	-	-	-	5-10 (15-20 FYE)	-
<b>James Thomson</b> Non-Executive Director	20-25	10-15	-	-	20-25	10-15

The Non-Executive Directors have been appointed on a three-year renewable contract with their remuneration determined by the number of days required for their duties at a rate per diem plus reimbursement of expenses. None of the current Non-Executive Directors are members of the Civil Service Pension Scheme as a result of their contract with the SFO.

## Executive board members' remuneration<sup>9</sup>

	Salary £000		Bonus payment £000		Pension benefits to nearest £1,000 <sup>10</sup>		Total £000	
	2024 - 25	2023 - 24	2024 - 25	2023 - 24	2024 - 25	2023 - 24	2024 - 25	2023 - 24
<b>Nick Ephgrave</b> Director	190-195	90-95 (180-185 FYE)	-	-	74	36	265-270	130-135
<b>Liz Corrin</b> CFO	5-10 (100-105 FYE)	95-100	-	-	34	68	40-45	165-170
<b>Michelle Crotty</b> CCO	5-10 (135-140 FYE)	135-140	0-5	0-5	3	53	10-15	185-190
<b>Freya Grimwood</b> Interim CCO	40-45 (105-110 FYE)	-	-	-	58	-	95-100	-
<b>Abigail Howarth</b> COO	70-75 (135-140 FYE)	125-130	0-5	-	27	50	100-105	175-180
<b>Tanya de Jager</b> CFO	90-95 (90-95 FYE)	-	-	-	36	-	125-130	-
<b>Sara Lawson KC<sup>11</sup></b> General Counsel	215-220 (160-165 FYE)	160-165	0-5	-	46	62	260-265	220-225

<sup>9</sup> Accrued pension benefits included in this table for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the legacy scheme for the period between 1 April 2015 and 31 March 2022, following the McCloud judgment. The Public Service Pensions 44 Remedy applies to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and 31 March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled back into the relevant legacy scheme for the remedy period and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the Alpha scheme for the period from 1 April 2015 to 31 March 2022.

<sup>10</sup> The value of pension benefits accrued during the year is calculated as (the real increase in pension multiplied by 20) plus (the real increase in any lump sum) less (the contributions made by the individual). The real increase excludes increases due to inflation or any increase or decrease due to a transfer of pension rights.

<sup>11</sup> Sara Lawson KC stepped down as General Counsel on 31 January 2025. Salary for 2024-25 includes £72k for an ex-gratia payment.

	Salary £000		Bonus payment £000		Pension benefits to nearest £1,000 <sup>10</sup>		Total £000	
	2024 - 25	2023 - 24	2024 - 25	2023 - 24	2024 - 25	2023 - 24	2024 - 25	2023 - 24
<b>Emma Luxton</b> Interim DirOps	55-60 (105-110 FYE)	-	0-5	-	50	-	105-110	-
<b>Graham McNulty</b> COO	75-80 (140-145 FYE)	-	-	-	30	-	105-110	-
<b>Matthew Wagstaff</b> Interim DLS	15-20 (110-115 FYE)	-	-	-	5	-	20-25	-

## Salary

'Salary' includes: gross salary; overtime; reserved rights to London weighting or London allowances; recruitment and retention allowances; and any other allowance to the extent that it is subject to UK taxation. This report is based on accrued payments made by the Department and thus recorded in these accounts.

## Benefits in kind

The monetary value of benefits in kind covers any benefits provided by the employer and treated by HM Revenue and Customs as a taxable emolument. There were no benefits in kind paid in the current or previous financial year.

## Bonuses

Bonuses are based on performance levels attained and are made as part of the appraisal process. Bonuses relate to the performance in the year prior to which they become payable to the individual. The bonuses reported in 2024-25 relate to performance in 2023-24, and the comparative bonuses reported for 2023-24 relate to performance in 2022-23.

## Fair pay

The SFO is required to disclose the relationship between the remuneration of the highest-paid individual and the median remuneration of the SFO's workforce.



	2024-25	2023-24
Highest paid individual (£000)	190-195	185-190
Median total (£)	42,989	40,951
Remuneration ratio	4.48	4.57

The ratios for 2024-25 have decreased compared to 2023-24 due to staff receiving pay increases in line with the pay remit.

Year	25th percentile pay ratio for pay and benefits	25th percentile pay ratio for salary only	75th percentile pay ratio for pay and benefits	75th percentile pay ratio for salary only
2024-25	35,190	35,190	60,092	59,661
	5.48	5.48	3.21	3.23
2023-24	32,797	32,797	58,372	56,672
	5.71	5.71	3.21	3.30

	2024-25 Total Remuneration	2024-25 Bonus Payments	2023-24 Total Remuneration	2023-24 Bonus Payments
Staff average	3.1%	-62.0%	13.6%	199.3%
Highest-paid director	2.9%	0.0%	0.0%	0.0%

In 2024-25, nil (2023-24: nil) employees received remuneration in excess of the highest-paid Board member. The figures include both permanent and non-permanent staff. Remuneration ranged from £20,000 - £25,000 to £190,000 - £195,000 (2023-24: £20,000 - £25,000 to £185,000 - £190,000).

Total remuneration includes salary, non-consolidated performance-related pay and benefits-in-kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions.

## Pension Benefits Board Executive Members

Accrued pension at pension age as at 31/3/25 or date of leaving and related lump sum £000		Real increase in pension and related lump sum at pension age £000	CETV at 31/3/25 £000	CETV at 31/3/24 £000	Real increase in CETV <sup>12</sup> £000
<b>Nick Ephgrave</b> Director	5-10	2.5-5	108	34	56
<b>Liz Corrin</b> CFO	65-70	0-2.5	1,359	1,316	30
<b>Michelle Crotty</b> CCO	35-40	0-2.5	623	584	2
<b>Freya Grimwood</b> Interim CCO	20-25	2.5-5	263	223	30
<b>Abigail Howarth</b> COO	20-25	0-2.5	355	315	19
<b>Tanya de Jager</b> CFO	15-20	0-2.5	218	187	18
<b>Sara Lawson KC</b> GC	20-25	2.5-5	355	289	32
<b>Emma Luxton</b> DirOps	25-30	2.5-5	466	417	38
<b>Graham McNulty</b> COO	0-5	0-2.5	26	0	21
<b>Matthew Wagstaff</b> Interim DLS	40-45 plus a lump sum of 25-30	0-2.5 plus a lump sum of 0	864	858	3

## Civil Service Pensions

Pension benefits are provided through the Civil Service pension arrangements. From 1 April 2015 a new pension scheme for civil servants was introduced – the Civil Servants

and Others Pension Scheme (CSOPS) or alpha, which provides benefits on a career average basis with a normal pension age equal to the member's State Pension Age

<sup>12</sup> CETV figures are calculated using the guidance on discount rates for calculating unfunded public service pension contribution rates that was extant at 31 March 2025.

(or 65 if higher). From that date all newly appointed civil servants and the majority of those already in service joined alpha. Prior to that date, civil servants participated in the Principal Civil Service Pension Scheme (PCSPS). The PCSPS has four sections: three providing benefits on a final salary basis (classic, premium or classic plus) with a normal pension age of 60; and one providing benefits on a whole career basis (nuvos) with a normal pension age of 65.

These statutory arrangements are unfunded with the cost of benefits met by monies voted by Parliament each year. Pensions payable under classic, premium, classic plus, nuvos and alpha are increased annually in line with Pensions Increase legislation. Existing members of the PCSPS who were within 10 years of their normal pension age on 1 April 2012 remained in the PCSPS after 1 April 2015. Those who were between 10 years and 13 years and 5 months from their normal pension age on 1 April 2012 switched into alpha sometime between 1 June 2015 and 1 February 2022. All members who switch to alpha had their PCSPS benefits 'banked', with those with earlier benefits in one of the final salary sections of the PCSPS having those benefits based on their final salary when they leave alpha. The pension figures quoted for officials show pension earned in PCSPS or alpha – as appropriate. Where the official has benefits in both the PCSPS and alpha the figure quoted is the combined value of their benefits in the two schemes. Members joining from October 2002 may opt for either the appropriate defined benefit arrangement or a 'money purchase' stakeholder pension with an employer contribution (partnership pension account).

Employee contributions are salary-related and range between 4.6% and 8.05% for members of classic, premium, classic plus, nuvos and alpha. Benefits in classic accrue at the rate of 1/80th of final pensionable earnings for each year of service. In addition, a lump sum equivalent to three years initial pension is payable on retirement. For premium, benefits accrue at the rate of 1/60th of final pensionable earnings for each year of service. Unlike classic, there is no automatic lump sum. Classic plus is essentially a hybrid with benefits for service before 1 October 2002 calculated broadly as per classic and benefits for service from October 2002 worked out as in premium. In nuvos a member builds up a pension based on their pensionable earnings during their period of scheme membership.

At the end of the scheme year (31 March) the member's earned pension account is credited with 2.3% of their pensionable earnings in that scheme year and the accrued pension is uprated in line with Pensions Increase legislation. Benefits in alpha build up in a similar way to nuvos, except that the accrual rate is 2.32%. In all cases members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004.

The partnership pension account is a stakeholder pension arrangement. The employer makes a basic contribution of between 8% and 14.75% (depending on the age of the member) into a stakeholder pension product chosen by the employee from a panel of providers. The employee does not have to contribute, but where they do make contributions, the employer will match these up to a limit of 3%

of pensionable salary (in addition to the employer's basic contribution). Employers also contribute a further 0.5% of pensionable salary to cover the cost of centrally-provided risk benefit cover (death in service and ill health retirement).

The accrued pension quoted is the pension the member is entitled to receive when they reach pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over pension age. Pension age is 60 for members of classic, premium and classic plus, 65 for members of nuvos, and the higher of 65 or State Pension Age for members of alpha. The pension figures quoted for officials show pension earned in PCSPS or alpha – as appropriate. Where the official has benefits in both the PCSPS and alpha the figure quoted is the combined value of their benefits in the two schemes, but note that part of that pension may be payable from different ages.

Further details about the Civil Service pension arrangements can be found at the website

[www.civilservicepensionscheme.org.uk](http://www.civilservicepensionscheme.org.uk)

## Cash Equivalent Transfer Values

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and

chooses to transfer the benefits accrued in their former scheme.

The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVs are worked out in accordance with the Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 and do not take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

## Real increase in CETV

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

## Staff

### Staff costs (subject to audit)

	2024-25 £000			2023-24 £000
	Permanently employed staff	Others	Total	Total
Wages and salaries	27,722	6,942	34,664	31,878
Social security costs	3,232	-	3,232	2,831
Other pension costs	7,608	-	7,608	6,438
<b>Total net costs</b>	<b>38,562</b>	<b>6,942</b>	<b>45,504</b>	<b>41,147</b>

No staff costs have been capitalised in 2024-25 (2023-24: £nil).

£6,942k of contingent labour<sup>13</sup> expenditure was incurred in 2024-25 (2023-24: £6,764k). There are nil members of staff on short-term loan and four on long-term loan to other government departments with an average duration of two years. The cost of staff on short-term loans are classified as programme.

For 2024-25, employers' contributions of £7,395k were payable to the PCSPS (2023-24: £6,333k) at one of four rates in the range of 20.0% to 25.5% of pensionable pay, based on salary bands.

The Scheme Actuary reviews employer contributions usually every four years following a full scheme valuation. The contribution rates reflect benefits as they are accrued, not when the costs are actually incurred and reflect past experience of the scheme.

Employees can opt to open a partnership pension account, a stakeholder pension with an employer contribution. Employers' contributions of £123k (2023-24: £100k) were paid to one or more of the panel of appointed stakeholder pension providers. Employer contributions are age-related and range from 3% to 12.5% of pensionable pay. Employers also match employee contributions up to 3% of pensionable pay. In addition, employer contributions of £nil (2023-24: £nil), were payable to the PCSPS to cover the cost of the future provision of lump sum benefits on death in service and ill-health retirement of these employees. Contributions due to the partnership pension providers at the balance sheet date were £14.4k (2023-24: £16k). Contributions prepaid at that date were £nil (2023-24: £nil).

<sup>13</sup> Non-Civil Service temporary labour – contractors, agency workers and temps – who will often, but not always, be recruited to undertake work.

## High paid off-payroll appointments

Following the Review of Tax Arrangements of Public Sector Appointees published by the Chief Secretary to the Treasury on 23 May 2013, departments must publish information on their high paid and/or senior off-payroll engagements.

For the SFO, these engagements are principally made up of temporary agency ICT staff to undertake specific IT tasks, in addition to some who have been there for longer periods.

### Off-payroll Engagements (e.g. contractors, consultants) as at 31 March 2025, for more than £245 per day and that last for longer than six months (not subject to audit)

<b>Number of existing engagements as at 31 March 2025</b>	<b>5</b>
of which:	
Number that have existed for less than one year at time of reporting	0
Number that have existed for between one and two years at time of reporting	3
Number that have existed for between two and three years at time of reporting	0
Number that have existed for between three and four years at time of reporting	1
Number that have existed for four years or more at time of reporting	1

All existing off-payroll engagements have been subject to a risk-based assessment as to whether assurance is required that the individual is paying the correct amount of tax and, where necessary, that assurance has been sought.

### Off-payroll temporary off-payroll appointments (e.g. contractors, consultants) engaged between 1 April 2024 and 31 March 2025, for more than £245 per day and that last for longer than six months (not subject to audit).

<b>Number of temporary off-payroll appointments engaged between 1 April 2024 and 31 March 2025</b>	<b>5</b>
of which:	
Not subject to off-payroll legislation	0
Subject to off-payroll legislation and determined as in-scope of IR35	5
Subject to off-payroll legislation and determined as out-of-scope of IR35	0
No. of engagements reassessed for compliance or assurance purposes during the year	0
Of which: No. of engagements that saw a change to IR35 status following review	0



All Board members, and/or senior officials with significant financial responsibility, between 1 April 2024 and 31 March 2025 were on payroll (2023-24: all Board members on payroll).

## Reporting of Civil Service and other compensation schemes – exit packages (subject to audit)

Exit package cost band	2024-25			2023-24
	Number of compulsory redundancies	Number of other departures agreed	Total number of exit packages by cost band	Total number of exit packages by cost band
<£10,000	-	-	-	-
£10,000 – £25,000	-	1	1	-
£25,000 – £50,000	-	1	1	-
£50,000 – £100,000	-	1	1	1
£100,000 – £150,000	-	-	-	-
£150,000 – £200,000	-	-	-	-
<b>Total Number of exit packages</b>	<b>-</b>	<b>3</b>	<b>3</b>	<b>1</b>
<b>Total cost £000</b>	<b>-</b>	<b>113</b>	<b>113</b>	<b>95</b>

Redundancy and other departure costs have been paid in accordance with the provisions of the Civil Service Compensation Scheme, a statutory scheme made under the Superannuation Act 1972. Exit costs are accounted for in full in the year of departure. Where the department has agreed early retirements, the additional costs are met by the department and not by the Civil Service pension scheme. Ill-health retirement costs are met by the pension scheme and are not included in the table.

## Average number of employees (subject to audit)

The average number of full-time equivalent employees during the year was as follows:

2024-25				2023-24
Permanently employed staff	Fixed Term Appointments	Agency Staff	Total	Total
496.3	28.0	119.0	<b>643.3</b>	<b>607.3</b>

The staff turnover percentage for 2024-25 for SFO was 13.2% (2023-24: 16.6%). This has been

calculated as the number of leavers within that period divided by the average of staff in post over the period (headcount) in accordance with the definition for 'Departmental Turnover' (staff leaving the Civil Service or a particular department) provided by the Cabinet Office.

## SCS by pay band

The number of SCS staff by pay band in the SFO as at 31 March 2025 was as follows:

	2024-25	2023-24
SCS 3	1	1
SCS 2	3	3
SCS 1	12	12
<b>Total (excluding non-executives)</b>	<b>16</b>	<b>16</b>

## Staff composition

The gender breakdown of permanent and fixed term staff at the SFO as at 31 March 2025 was as follows:

	Male	Female
SCS	9	7
Non SCS staff	323	314
<b>Total</b>	<b>332</b>	<b>321</b>

The SFO is committed to equality of opportunity and diversity in all its employment practices, policies and procedures. This means that no employee or potential employee will receive less favourable treatment due to their race, sexual orientation, nationality, ethnic origin, disability, religion and belief, gender identity or marital status. We are committed to the employment and career development of people with disabilities. To demonstrate our commitment we display the 'Disability Confident' symbol in all our recruitment literature.

As an accredited Disability Confident Employer we:

- Have undertaken and successfully completed the Disability Confident self-assessment

- Are taking all of the core actions to be a Disability Confident employer
- Are offering at least one activity to get the right people for our business and at least one activity to keep and develop our people

In addition, the SFO operates a guaranteed interview scheme which means that it is committed to interviewing all disabled applicants who meet the minimum criteria for a job vacancy and to consider them on their abilities. On a case-by-case basis the SFO seeks to make reasonable adjustments to support employees who are, or become, disabled to make sure they stay in employment.

The SFO is committed to providing an environment where everyone is treated with dignity and respect, recognising the differences between people and positively valuing the spectrum of skills and talent of its people. The SFO's Dignity at Work policy emphasises the importance of treating everyone with dignity and respect, irrespective of any of the protected characteristics. The SFO's policy offers guidance on what to do if unacceptable behaviour occurs.

The development and implementation of the SFO's equity, diversity and inclusion action plan is overseen by a Diversity Champion at SCS level.

## Staff feedback

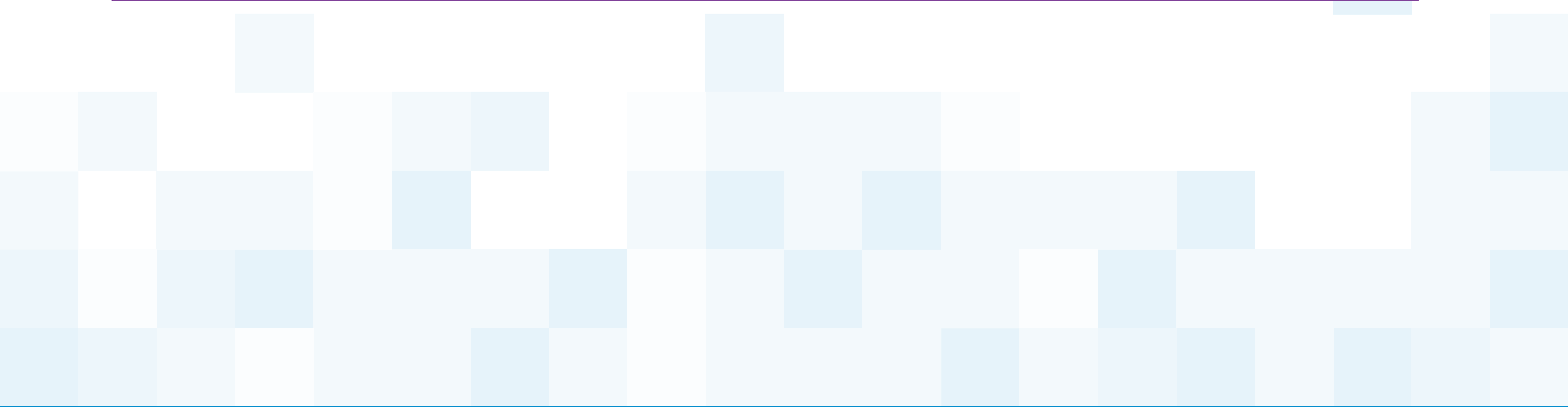
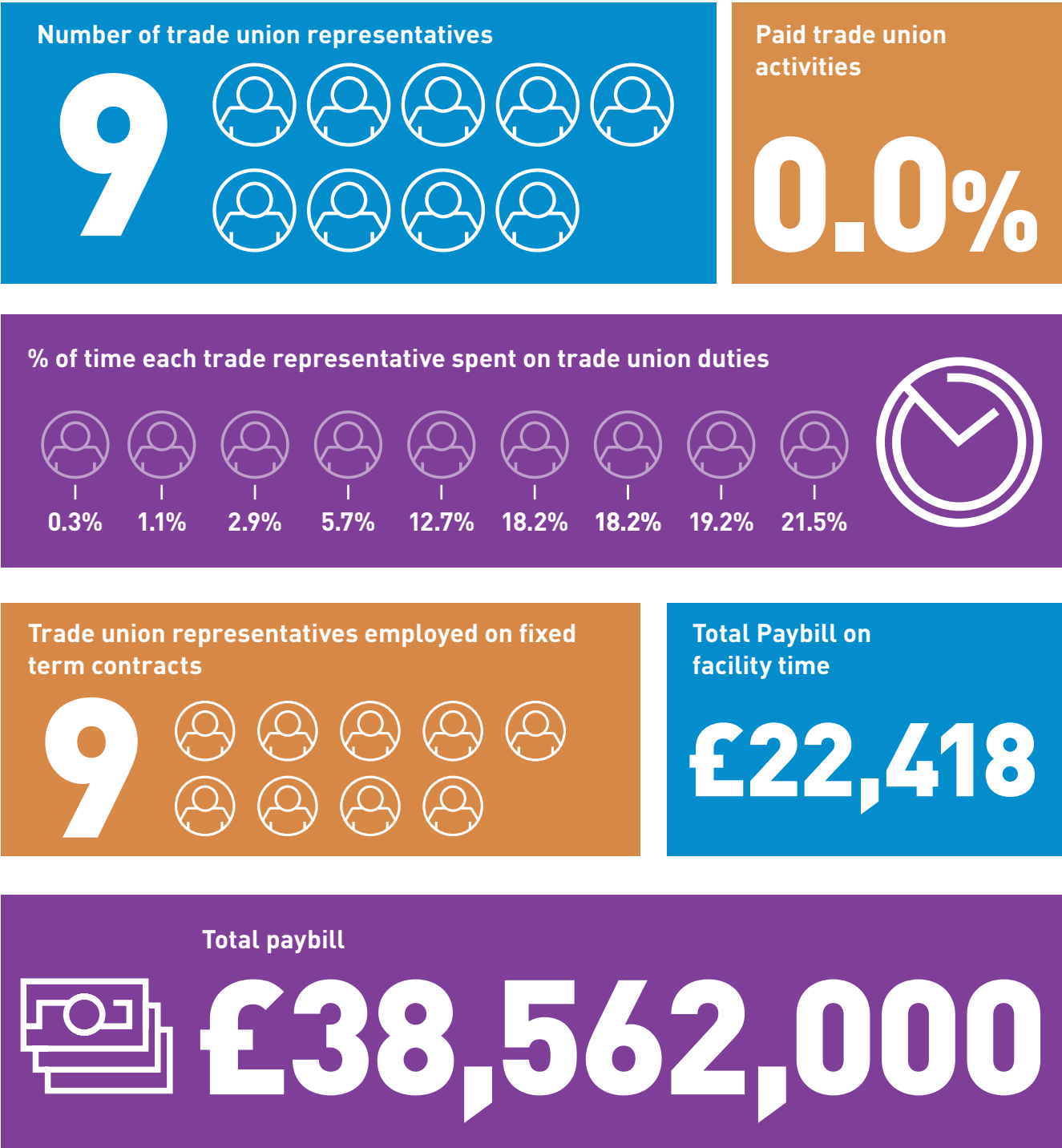
The SFO takes engagement with its people very seriously. The annual Civil Service People Survey is one of the tools that we use to gather feedback and understand what is important to our staff. In 2024-25, the SFO's engagement score was 64%, compared to 60% in 2023-24. There were material increases in the SFO's scores related to Leadership and Managing Change (13 percentage points) and Organisational Objectives and Purpose (six percentage points). Whilst Pay and Benefits increased by five percentage points, the overall score of 21% remains challenging. Scores across the remaining core themes remained relatively stable: there were small increases in Learning and Development (four percentage points) and Resources and Workload (two percentage points), whilst My Work, My Team and My Manager saw a small decline of one percentage point and Inclusion and Fair Treatment did not change. The organisation's response rate was lower than in the previous year (61% compared to 70%). The SFO developed organisational and divisional proposals to build on areas of good practice and work on areas requiring further improvement. These were factored into the development of the SFO's 2025-26 business plan.

## Sickness absence

There has been a decrease in Average Working Days Lost (AWDL)<sup>14</sup> from 5.11 days in 2023-24 to 4.95 days in 2024-25.

<sup>14</sup> Due to an update in methodology, the Average Working Days Lost figures are not directly comparable with those set out in the 2023-24 Annual Report and Accounts.

Trade union facility time information





# Parliamentary Accountability and Audit



# Statement of Outturn against Parliamentary Supply (SoPS)

In addition to the primary statements prepared under IFRS, the Government Financial Reporting Manual (FReM) requires the SFO to prepare a Statement of Outturn against Parliamentary Supply (SOPS) and supporting notes.

The SOPS and related notes are subject to audit, as detailed in the Certificate and Report of the Comptroller and Auditor General to the House of Commons.

The SOPS is a key accountability statement that shows, in detail, how an entity has spent against their Supply Estimate. Supply is the monetary provision (for resource and capital purposes) and cash (drawn primarily from the Consolidated Fund), that Parliament gives statutory authority for entities to utilise.

The Estimate details supply and is voted on by Parliament at the start of the financial year.

Should an entity exceed the limits set by their Supply Estimate, called control limits, their accounts will receive a qualified opinion.

The format of the SoPS mirrors the Supply Estimates, published on gov.uk, to enable comparability between what Parliament approves and the final outturn.

The SOPS contain a summary table, detailing performance against the control limits that Parliament has voted on, cash spent (budgets are compiled on an accruals

basis and so outturn will not exactly tie to cash spent) and administration.

The supporting notes detail the following: Outturn by Estimate line, providing a more detailed breakdown (SOPS 1); a reconciliation of outturn to net operating expenditure in the SOCNE, to tie the SOPS to the financial statements (SOPS 2); a reconciliation of outturn to net cash requirement (SOPS 3); and, an analysis of income payable to the Consolidated Fund (SOPS 4).

The SOPS and Estimates are compiled against the budgeting framework, which is similar to, but different to, IFRS. An explanation of the budgeting framework and of key terms is provided on page 30, in the financial performance section of the Performance Analysis. Further information on the Public Spending Framework and the reasons why budgeting rules are different to IFRS can also be found in Chapter 1 of the Consolidated Budgeting Guidance, available on gov.uk.

The SOPS provides a detailed view of financial performance, in a form that is voted on and recognised by Parliament. The financial performance section, in the Performance Analysis, provides a summarised discussion of outturn against estimate and functions as an introduction to the SOPS disclosures.



## Summary tables - mirrors part 1 of the Estimates

Summary table, 2024-25, all figures presented in £000's

	Note	2024-25 £000						2023-24 £000
		Outturn			Estimate			Outturn
		Voted	Non Voted	Total	Voted	Non Voted	Total	Total
<b>Departmental Expenditure Limit</b>								
Resource	1.1	85,058	-	85,058	87,957	-	87,957	89,588
Capital	1.2	6,619	-	6,619	11,800	-	11,800	1,896
<b>Annually Managed Expenditure</b>								
Resource	1.1	(206,788)	-	(206,788)	-	-	-	231,710
<b>Total Budget</b>		<b>(115,111)</b>	<b>-</b>	<b>(115,111)</b>	<b>99,757</b>	<b>-</b>	<b>99,757</b>	<b>323,194</b>
Total Resource		(121,730)	-	(121,730)	87,957	-	87,957	321,298
Total Capital		6,619	-	6,619	11,800	-	11,800	1,896
<b>Total</b>		<b>(115,111)</b>	<b>-</b>	<b>(115,111)</b>	<b>99,757</b>	<b>-</b>	<b>99,757</b>	<b>323,194</b>

Figures in the areas outlined in thick lines cover the voted control limits voted by Parliament. Refer to the Supply Estimates guidance manual, available on gov.uk, for detail on the control limits voted by Parliament.

## Net cash requirement

	2024-25 £000				2023-24 £000
	Outturn compared with Estimate: saving/ (excess)				
	SoPS Note	Outturn	Estimate		Outturn
Net Cash Requirement	3	104,768	116,400	11,632	72,394

## Administration costs

			2024-25 £000	2023-24 £000
	Outturn	Estimate	Outturn compared with Estimate: saving/ (excess)	Outturn
Administration Costs	13,256	13,406	150	9,910

Although not a separate voted limit, any breach of the administration budget will also result in an excess vote. Explanation of variances between Estimate and Outturn are given in SoPS Note 1.

## SoPS1 Outturn detail, by Estimate line

### SoPS1.1 Analysis of resource outturn by Estimate line

	2024-25 £000									2023-24 £000	
	Outturn						Estimate		Outturn		
	Administration			Programme			Net Total Virements	Net Total	Net total compared to Estimate	Total	
	Gross Income	Net		Gross Income	Net						
Spending in Departmental Expenditure Limit											
<b>Voted:</b> Investigations and Prosecutions	13,256	-	13,256	72,173	(371)	71,802	85,058	-	87,957	2,899	<b>89,588</b>
Spending in Annually Managed Expenditure											
<b>Voted:</b> New provision and adjustment to existing provisions	-	-	-	(206,788)	-	(206,788)	(206,788)	-	-	206,788	<b>231,710</b>
<b>Total</b>	<b>13,256</b>	<b>-</b>	<b>13,256</b>	<b>(134,615)</b>	<b>(371)</b>	<b>(134,986)</b>	<b>(121,730)</b>	<b>-</b>	<b>87,957</b>	<b>209,687</b>	<b>321,298</b>

#### Explanation of variation between Estimate and Outturn (net total resources):

There has been an overall underspend against the Estimate.

The underspend on Resource DEL was £2,899k. In line with HMT's consolidated budgeting guidelines, the SFO held a contingency of 5% to meet unforeseen pressures, which has contributed to the underspend. In addition, there were budgeted costs relating to our cases which did not crystallise as planned in the last quarter of the year.

The AME outturn is due to writing back a large portion of the provision made last year as not required.

The SFO's AME outturn represents our legal provisions, which by their nature are difficult to predict.

**SoPS1.2 Analysis of capital outturn by Estimate line**

	2024-25 £000						2023-24 £000
	Outturn			Estimate			Outturn
	Gross	Income	Net	Virements	Net Total	Net total compared to Estimate	Total
<b>Spending in Departmental Expenditure Limit</b>							
<b>Voted:</b> Investigations and Prosecutions	6,619	-	6,619	-	11,800	5,181	<b>1,896</b>
<b>Total</b>	<b>6,619</b>	<b>-</b>	<b>6,619</b>	<b>-</b>	<b>11,800</b>	<b>5,181</b>	<b>1,896</b>

**Explanation of variance between Estimate and Outturn:**

Capital DEL has an underspend of £5,181k. The underspend is largely due to IFRS16 Right of Use Asset capitalisation being lower than anticipated due to a projected shorter lease period for Cockspur Street.

**SoPS2 Reconciliation of outturn to net operating expenditure**

	SoPS Note	2024-25 £000	2023-24 £000
		Outturn	Outturn
Total resource outturn in Statement of Parliamentary Supply	1.1	(121,730)	321,298
Less income payable to the Consolidated Fund	4.1	(34,762)	-
<b>Net Operating Cost in Statement of Comprehensive Net Expenditure</b>		<b>(156,492)</b>	<b>321,298</b>

As noted in the introduction to the SOPS (page 70), outturn and the Estimates are compiled against the budgeting framework, which is similar to, but different from, IFRS. Therefore, this reconciliation bridges the resource outturn to net operating expenditure, linking the SOPS to the financial statements.

## SoPS3 Reconciliation of net resource outturn to net cash requirement

		2024-25 £000			2023-24 £000
	SoPS Note	Outturn	Estimate	Net total outturn compared with Estimate: saving / (excess)	
<b>Resource Outturn</b>	1.1	<b>(121,730)</b>	<b>87,957</b>	<b>209,687</b>	<b>321,298</b>
<b>Capital outturn</b>	1.2	<b>6,619</b>	<b>11,800</b>	<b>5,181</b>	<b>1,896</b>
<b>Accruals to cash adjustments: Adjustments to remove non-cash items:</b>					
Depreciation		(4,015)	(4,357)	(342)	(3,775)
New Provisions and adjustments to previous provisions		206,788	-	(206,788)	(234,620)
(Increase) / Decrease in payables		17,394	21,000	3,606	(19,193)
Increase / (Decrease) in receivables		2,033		(2,033)	2,083
Other non-cash items		156		(156)	(120)
Leased asset additions and adjustments		(2,477)		2,477	1,915
Use of provision		-		-	2,910
<b>Net cash requirement</b>		<b>104,768</b>	<b>116,400</b>	<b>11,632</b>	<b>72,394</b>

As noted in the introduction to the SOPS above, outturn and the Estimates are compiled against the budgeting framework, not on a cash basis. Therefore, this reconciliation bridges the resource and capital outturn to the net cash requirement. SoPS4 Income payable to the Consolidated Fund.

SoPS4.1 Analysis of income payable to the Consolidated Fund

In addition to income retained by the Department, the following income is payable to the Consolidated Fund.

	2024-25		2023-24	
	Outturn £000		Outturn £000	
	Income	Receipts	Income	Receipts
Income outside ambit of the Estimate	(34,762)	-	-	(1,623)
Excess cash surrenderable to the Consolidated Fund				
Total payable to the Consolidated Fund	(34,762)	-	-	(1,623)

Income outside the ambit of the Estimate primarily refers to receipts from the Asset Recovery Incentivisation Scheme (ARIS). The ARIS scheme permits investigators and prosecutors to receive a percentage of confiscated criminal assets and income from civil settlements.



Nick Ephgrave QPM  
Accounting Officer

4 July 2025





# Accountability

This information has been audited.

## Losses and special payments

HM Treasury’s Managing Public Money requires a statement showing losses and special payments by value and by type to be shown where they exceed £300k in total, and those individually that exceed £300k.

### Losses

No losses have been incurred in 2024-25. (2023-24, £2.9m).

### Special payments

No special payments have been incurred in 2024-25. (2023-24, £9m).

## Contingent liabilities

There are no contingent liabilities for 2024-25. (2023-24, none).



## Long-term expenditure trends (not audited)

Like all government departments, the SFO is subject to spending controls set by Parliament and administered by HM Treasury. Forward looking spending plans are set through Spending Reviews, which set the level of resources available to departments over the term of the review.

Specific control totals for the current financial year are then confirmed through Estimates, which are voted on by Parliament. There are two Estimate publications during the financial year: in May the Main Estimate sets the initial budgets for the year, whilst in February the Supplementary Estimate allows for adjustments to be made and confirms the final budgets against which outturn will be measured. If outturn exceeds the controls voted by Parliament, then this results in an Excess Vote. For details of the final outturn for the year see the Statement of Parliamentary Supply on page 70.

	<b>2020-21 £000</b>	<b>2021-22 £000</b>	<b>2022-23 £000</b>	<b>2023-24 £000</b>	<b>2024-25 £000</b>
Non-ring fenced DEL	50,677	53,214	52,434	317,523	<b>(125,745)</b>
Ring fenced DEL	2,700	2,700	5,339	3,775	<b>4,015</b>
<b>Resource DEL</b>	<b>53,377</b>	<b>55,914</b>	<b>57,773</b>	<b>321,298</b>	<b>(121,730)</b>
<b>Capital DEL</b>	<b>3,600</b>	<b>3,900</b>	<b>5,502</b>	<b>1,896</b>	<b>6,619</b>

The Resource Departmental Expenditure Limit (DEL) funding is to cover the costs of the SFO incurred in investigating and, where appropriate, prosecuting cases of serious or complex fraud, bribery and corruption. Ring fenced DEL is non cash funding to cover the anticipated costs of depreciation of non-current assets financed via Capital DEL.

In addition to the above the SFO currently has access to HM Treasury Reserve funding to finance the costs of investigating very large and complex cases. This financing is agreed with HM Treasury on a case by case and year by year basis.

The Capital DEL Funding is to enable the SFO to invest in improving and developing its IT infrastructure to meet its operational needs, procure a new Document Review and Case Management System and keep pace with technological developments.



**Nick Ephgrave QPM**  
Accounting Officer, 4 July 2025

# The Certificate and Report of the Comptroller and Auditor General to the House of Commons

## Opinion on financial statements

I certify that I have audited the financial statements of the Serious Fraud Office for the year ended 31 March 2025 under the Government Resources and Accounts Act 2000.

The financial statements comprise the Serious Fraud Office's

- Statement of Financial Position as at 31 March 2025;
- Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted international accounting standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Serious Fraud Office's affairs as at 31 March 2025 and its net expenditure for the year then ended; and
- have been properly prepared in accordance with the Government Resources and Accounts Act 2000 and HM Treasury directions issued thereunder.

## Emphasis of matter

I draw attention to the disclosures made in note 13 to the financial statements highlighting the significant uncertainty over the valuation of the provision for legal costs. As set out in this note 13, there is substantial reduction in the provision related to an ongoing legal case with ENRC from £237.7m at 1 April 2024 to £30.9m at 31 March 2025. Some judgments have been handed down relating to the claim, but a number of legal proceedings remain which could alter the value of the provision. My opinion is not modified in respect of this matter.

## Opinion on regularity

In my opinion, in all material respects:

- the Statement of Outturn against Parliamentary Supply properly presents the outturn against voted Parliamentary control totals for the year ended 31 March 2025 and shows that those totals have not been exceeded; and
- the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

## Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK)

(ISAs UK), applicable law and Practice Note 10 *Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2024)*. My responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's *Revised Ethical Standard 2019*. I am independent of the Serious Fraud Office in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

## Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Serious Fraud Office's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Serious Fraud Office's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities

of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Serious Fraud Office is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

## Other information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate and report thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based

on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

## Opinion on other matters

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000.

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000;
- the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

## Matters on which I report by exception

In the light of the knowledge and understanding of the Serious Fraud Office and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Reports.

I have nothing to report in respect of the

following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the Serious Fraud Office or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

## Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Accounting Officer is responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;

- providing the C&AG with additional information and explanations needed for his audit;
- providing the C&AG with unrestricted access to persons within the Serious Fraud Office from whom the auditor determines it necessary to obtain audit evidence;
- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view, in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with HM Treasury directions issued under the Government Resources and Accounts Act 2000; and
- assessing the Serious Fraud Office's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Serious Fraud Office will not continue to be provided in the future.

## Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Government Resources and Accounts Act 2000.

My objectives are to obtain reasonable assurance about whether the financial

statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

### Extent to which the audit was considered capable of detecting non-compliance with laws and regulations, including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

### Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the Serious Fraud Office's accounting policies;
- inquired of management, the Serious Fraud Office's head of internal audit and those charged with governance, including

obtaining and reviewing supporting documentation relating to the Serious Fraud Office's policies and procedures on:

- identifying, evaluating and complying with laws and regulations;
- detecting and responding to the risks of fraud; and
- the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Serious Fraud Office's controls relating to the Serious Fraud Office's compliance with the Government Resources and Accounts Act 2000, Managing Public Money and the Supply and Appropriation (Main Estimates) Act 2024;
- inquired of management, the Serious Fraud Office's head of internal audit and those charged with governance whether:
  - they were aware of any instances of non-compliance with laws and regulations;
  - they had knowledge of any actual, suspected, or alleged fraud,
- discussed with the engagement team regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Serious Fraud Office for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions and bias in management estimates. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to

the risk of management override.

I obtained an understanding of the Serious Fraud Office's framework of authority and other legal and regulatory frameworks in which the Serious Fraud Office operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Serious Fraud Office. The key laws and regulations I considered in this context included Government Resources and Accounts Act 2000, Managing Public Money, Supply and Appropriation (Main Estimates) Act 2024, Criminal Justice Act 1987, the Prosecution of Offences Act 1985, the Criminal Procedure and Investigations Act 1996, employment law, tax legislation and pensions legislation.

#### **Audit response to identified risk**

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Audit, Risk and Assurance Committee and in-house legal counsel concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board; and internal audit reports;
- In addressing the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing



whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of my certificate.

### **Other auditor's responsibilities**

I am required to obtain appropriate evidence sufficient to give reasonable assurance that the Statement of Outturn against Parliamentary Supply properly presents the outturn against voted Parliamentary control totals and that those totals have not been exceeded. The voted Parliamentary control totals are Departmental Expenditure Limits (Resource and Capital), Annually Managed Expenditure (Resource and Capital), Non-Budget (Resource) and Net Cash Requirement.

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

## **Report**

I have no observations to make on these financial statements.

**Gareth Davies**  
**Comptroller and Auditor General**

**9 July 2025**

National Audit Office  
157-197 Buckingham Palace Road  
Victoria  
London  
SW1W 9SP

# Financial Statements

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# Statement of Comprehensive Net Expenditure

For the year ended 31 March 2025

	Note	2024-25 £000	2023-24 £000
<b>Income</b>			
Cost awards and other income	4	371	96
Consolidated fund extra receipts	4	34,762	-
<b>Total operating income</b>		<b>35,133</b>	<b>96</b>
<b>Expenditure</b>			
Staff costs	2	45,504	41,147
Purchase of goods and services	3	33,707	39,419
Accommodation	3	2,128	2,313
Depreciation and impairment charges	3	4,015	3,775
Increase/(decrease) in provision	3	(206,794)	234,620
Other operating expenditure	3	81	120
<b>Total</b>		<b>(121,359)</b>	<b>321,394</b>
<b>Net (income)/expenditure</b>		<b>(156,492)</b>	<b>321,298</b>

No other comprehensive expenditure has been incurred. The notes on page 91 - 106 form part of these accounts.

# Statement of Financial Position

As at 31 March 2025

	Note	2024-25 £000	2023-24 £000
<b>Non-Current Assets:</b>			
Property, plant and equipment	5	3,722	3,133
Intangible assets	6	1,059	1,418
Trade and other receivables	11	6	6
Right-of-use asset	14	2,816	239
<b>Total non-current assets</b>		<b>7,603</b>	<b>4,796</b>
<b>Current Assets:</b>			
Trade receivables and other current assets	11	40,584	3,786
Cash and cash equivalents	10	11,632	20,333
<b>Total current assets</b>		<b>52,216</b>	<b>24,119</b>
<b>Total assets</b>		<b>59,819</b>	<b>28,915</b>
<b>Current liabilities:</b>			
Trade payables and other current liabilities	12	(58,471)	(48,101)
Provisions	13	(31,372)	(238,160)
Lease liability	14	(1,869)	(68)
<b>Total current liabilities</b>		<b>(91,712)</b>	<b>(286,329)</b>
<b>Non-current assets plus/less net current assets/liabilities</b>		<b>(31,893)</b>	<b>(257,414)</b>
<b>Non-current liabilities</b>			
Lease liability	14	(1,100)	(209)
<b>Total non-current liabilities</b>		<b>(1,100)</b>	<b>(209)</b>
<b>Assets less liabilities</b>		<b>(32,993)</b>	<b>(257,623)</b>
<b>Taxpayers' equity:</b>			
General fund		(32,993)	(257,734)
Revaluation reserve		-	111
<b>Total taxpayers equity</b>		<b>(32,993)</b>	<b>(257,623)</b>



**Nick Ephgrave QPM**  
Accounting Officer, 4 July 2025

The notes on pages 91 - 106 form part of these accounts.

# Statement of Cash Flows

For the year ended 31 March 2025

	Note	2024-25 £000	2023-24 £000
<b>Cash flows from operating activities</b>			
Net operating cost		156,492	(321,298)
Adjustments for non-cash transactions	3	(202,906)	238,441
(Increase)/Decrease in trade and other receivables less movements in receivables relating to items not passing through the Statement of Comprehensive Net Expenditure	11	(36,795)	(136)
Increase/(Decrease) in trade payables less movements in payables relating to items not passing through the Statement of Comprehensive Net Expenditure		10,370	20,599
		(27,764)	(3,356)
Use of provisions		-	(2,910)
<b>Net cash outflow from operating activities</b>		<b>(100,603)</b>	<b>(68,660)</b>
<b>Cash flows from investing activities</b>			
Purchase of property, plant and equipment	5	(1,560)	(1,092)
Purchase of intangible assets	6	(664)	(804)
<b>Net cash outflow from investing activities</b>		<b>(2,224)</b>	<b>(1,896)</b>
<b>Cash flows from financing activities</b>			
From the Consolidated Fund (Supply) – current year		96,067	77,700
Repayment of principal on lease		(1,918)	(1,915)
Finance cost on leases		221	74
<b>Net financing</b>		<b>94,370</b>	<b>75,859</b>
<b>Net increase/(decrease) in cash and cash equivalents in the period before adjustment for receipts and payments to the Consolidated Fund</b>		<b>(8,457)</b>	<b>5,303</b>

	Note	2024-25 £000	2023-24 £000
Payments of amounts due to the Consolidated Fund		(244)	-
<b>Net increase/(decrease) in cash and cash equivalents in the period after adjustment for receipts and payments to the Consolidated Fund</b>		<b>(8,701)</b>	<b>5,303</b>
<b>Cash and cash equivalents at the beginning of the period</b>	10	<b>20,333</b>	<b>15,030</b>
<b>Cash and cash equivalents at the end of the period</b>	10	<b>11,632</b>	<b>20,333</b>

The notes on pages 91 - 106 form part of these accounts.

# Statement of Changes in Taxpayers' Equity

For the year ended 31 March 2025

	Note	General Fund £000	Revaluation Reserve £000	Total Reserves £000
<b>Balance at 31 March 2023</b>		<b>(10,857)</b>	<b>111</b>	<b>(10,746)</b>
Net Parliamentary Funding		77,700	-	77,700
Net Parliamentary Funding – deemed		15,030	-	15,030
Supply (payable)/receivable adjustment	12	(18,386)	-	(18,386)
CFERS payable to the Consolidated Fund	4	-	-	-
Comprehensive Net Expenditure		(321,298)	-	(321,298)
<b>Non-Cash Adjustments</b>				
Non-cash charges - auditor's remuneration	3	77	-	77
<b>Balance at 31 March 2024</b>		<b>(257,734)</b>	<b>111</b>	<b>(257,623)</b>
Net Parliamentary Funding - drawn down		96,065	-	96,065
Net Parliamentary Funding – deemed		18,386	-	18,386
Supply (payable)/receivable adjustment	12	(11,632)	-	(11,632)
CFERS payable to the Consolidated Fund	4	(34,762)	-	(34,762)
Net operating expenditure		156,492	-	156,492
<b>Non-Cash Adjustments</b>				
Non-cash charges - auditor's remuneration	3	81	-	81
<b>Movement in Reserves</b>				
Transfer between reserves		111	(111)	
<b>Balance at 31 March 2025</b>		<b>(32,993)</b>	<b>-</b>	<b>(32,993)</b>

The notes on pages 91 - 106 form part of these accounts.



# Notes to the Accounts

## 1. Statement of accounting policies

These financial statements have been prepared in accordance with the 2024-25 Government Financial Reporting Manual (FReM) issued by HM Treasury. The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context.

Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the SFO for the purpose of giving a true and fair view has been selected. The particular policies adopted by the SFO are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

### Accounting convention

These accounts have been prepared under the historical cost convention and where material modified to account for the revaluation of property, plant and equipment and intangible assets at their value to the business by reference to their current costs.

### Going Concern

These accounts have been prepared on a going concern basis. Further information is included on page 16.

### Financial instruments

Financial assets and financial liabilities are recognised in the Statement of Financial Position when the SFO becomes a party to the contractual provisions of the

instrument. The Department is subject to a limited range of financial instruments as its cash requirements are met through the Estimates process, and it is not exposed to significant credit, liquidity or market risk.

### Borrowings

The SFO has limited powers to borrow money to fund short-term fluctuations in cash flow.

### Trade receivables

Trade and other receivables are non-interest bearing and stated at fair value. Provision is made where there is evidence that the balances will not be recovered in full. Note 11 on page 102 sets out the closing receivable values at 31 March.

### Cash and cash equivalents

Cash and cash equivalents include cash at bank and in hand, and short-term highly-liquid deposits with a maturity period of three months or less. Note 10 on page 102 sets out the closing cash balances held by the SFO.

### Trade payables

Trade payables are not interest bearing and are stated at their fair value. Note 12 on page 103 sets out the closing payable values at 31 March.

### Property, plant and equipment and intangible assets

The Department does not own any freehold land or buildings. Property, plant and equipment assets are included in the Statement of Financial Position at their fair values. Expenditure on property, plant and equipment and intangible assets is

capitalised when that expenditure, on an individual basis, is £2,000 or more. For IT expenditure the £2,000 threshold is applied to assets on a grouped basis. Development expenditure represents internally generated assets under construction.

Property, plant and equipment and intangible assets are subject to consideration for an annual impairment review if there are any indicators of such impairments arising. Notes 5.1 page 98 and 6.1 page 100 detail the closing position at 31 March.

**Revaluation reserve**

The unrealised element of the Revaluation Reserve is disclosed in the Statement of Financial Position. Realised elements are transferred from the reserve to the General Fund. Downward revaluations are charged to the existing balance brought forward for that particular asset. If there is no previous balance, the charge is expensed in-year and disclosed in the Statement of Comprehensive Net Expenditure.

**Depreciation and amortisation**

Depreciation and amortisation are provided monthly on a straight line basis at rates calculated to write off the valuation of property, plant and equipment and intangible assets, less the estimated residual value, over their estimated useful lives. Depreciation and amortisation are provided from the month of acquisition up to and including the month of disposal.

The useful lives, residual values and depreciation and amortisation methods are reviewed annually with any revisions to those estimates accounted for retrospectively. The respective useful lives

are as follows:

Property, plant and equipment	
Improvements to leasehold property	Over the unexpired term of the lease
Information technology	5 years
Furniture and fittings	5-10 years
Right of use assets	Over the unexpired term of the lease

Intangible assets	
Software licenses	Over the term of the software license
Information technology	5 years or over the unexpired term of the software license (whichever is the shorter)
Website	5 years

Development expenditure is not amortised until the assets are brought into use, at which point amortisation is applied in accordance with the asset category to which the asset is transferred on coming into use.

**Costs awarded to the SFO**

Costs may be awarded to the SFO as prosecutor under Section 18 of the Prosecution of Offences Act 1985 following a successful prosecution, or as a result of subsequent appeal proceedings. Where costs are awarded, they may subsequently be revoked or reduced as a result of a successful appeal by the defendant. The

court may order that they are not to be recovered without leave of the court, defer recovery until a future date, or subsequently vary the amount and/or timing of recovery or waive it altogether. Responsibility for the recovery of costs awarded rests with the appropriate magistrates' court. The SFO has no powers to recover costs awarded to it.

Where costs are awarded, they are shown as receivables on the Statement of Financial Position. Where they may not be recovered without leave of the court, full provision is made against them until leave is obtained. In other cases, the SFO makes a judgement on the likelihood of costs being recovered based on the circumstances of each case, and may make provisions accordingly. In practice, full provision is made one year after the debt becomes due except where the defendant is making regular payments to the SFO. Where costs are subject to appeal proceedings, full provision is made against them until all proceedings are finally determined. Subsequent treatment of these receivables and provisions will depend on the outcome of the proceedings.

Costs awarded to the SFO are written off after a period of five years unless there are compelling reasons to believe that payment will be received.

### **Costs awarded against the SFO**

Any costs awarded against the SFO are included under prosecution costs for the year in which the awards are made unless awarded against the SFO due to inadequacy on the part of the SFO. In such cases costs awarded against the SFO are included within the losses and special payments note on page 77 as part of the Parliamentary Accountability and Audit section.

### **Asset Recovery Incentivisation Scheme**

SFO receipts from the Asset Recovery Incentivisation Scheme (ARIS) for Civil Recovery and Confiscation Orders are recognised at the point that settlement is confirmed by the Courts and the Home Office agrees the allocation. From April 2014 all ARIS receipts are paid to the Consolidated Fund as a Consolidated Fund Extra Receipt (CFER) and recorded as such in the Statement of Parliamentary Supply note 4.1 on page 76. The SFO does not retain any receipts from ARIS.

### **Other income**

Any amounts relating to income not covered above is recognised at the point of payment and includes both budgetary and non-budgetary income. Non-budgetary income is outside the ambit of the Department and is surrenderable to the Consolidated Fund as a CFER and recorded as such in the Statement of Parliamentary Supply note 4.1 on page 76.

### **Foreign exchange**

The presentational currency used for the financial statements is sterling. Transactions which are denominated in a foreign currency are translated at the rate of exchange ruling on the date of the transaction, except where rates do not fluctuate significantly, in which case an average rate for the period is used.

### **Pensions**

Pension benefits are provided through the Civil Service pension arrangements. From 1 April 2015 a new scheme, alpha, was introduced with transition arrangements in place for staff who were members of the prior scheme the Principal Civil Service Pension Scheme (PCSPS). Both alpha

and PCSPS schemes are unfunded and are non-contributory except in respect of dependants' benefits. The Department recognises the expected cost of providing pensions on a systematic and rational basis over the period during which it benefits from employees' services by payment to the schemes of amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on alpha and the PCSPS.

### **Provisions – Legal, Leasehold and Other**

The Department provides for legal and constructive obligations, which are of uncertain timing or amount, at the reporting date on the basis of the best estimate of the expenditure required to settle the obligation.

Where the effect of the time value of money is significant, the estimated risk-adjusted cash flows are discounted using the HM Treasury discount rate. Note 13 on page 104 sets out the current value of provisions at the SFO.

### **Value Added Tax (VAT)**

Most of the activities of the Department are outside the scope of VAT, and in general output tax does not apply and input tax on purchases is not recoverable. Irrecoverable VAT is charged to the relevant expenditure category or included in the capitalised purchase cost of property, plant and equipment and intangible assets. Where output tax is charged or input VAT is recoverable, the amounts are stated net of VAT.

### **Third party assets**

The Department may seize monetary assets. If the Department retains any monetary assets, it invests the sums in an

interest-bearing account. The principal and the interest earned are held on behalf of the third party and are not a part of the Department's accounts, details of sums held are disclosed in note 16 on page 106.

### **Contingent liabilities**

In addition to contingent liabilities disclosed in accordance with IAS 37, the Department discloses for parliamentary reporting and accountability purposes certain statutory and non-statutory contingent liabilities where the likelihood of a transfer of economic benefit is remote, but which have been reported to Parliament in accordance with the requirements of Managing Public Money.

Where the time value of money is material, contingent liabilities which are required to be disclosed under IAS 37 are stated at discounted amounts and the amount reported to Parliament separately noted. Contingent liabilities that are not required to be disclosed by IAS 37 are stated at the amounts reported to Parliament.

### **Operating segments**

The Department does not have any operating segments to report.

### **Right of use assets**

Right-of-use assets are depreciated on a straight line basis over the associated lease term, or estimated useful life where this is shorter. Impairment losses are charged in the same way as those arising on property, plant and equipment.

As permitted by the FReM, right-of-use assets are subsequently measured using the cost model as a proxy for the measurement of the cost value in use. This is because lease terms require

lease payments to be updated for market conditions, for example, rent reviews for leased properties, which will be captured in the IFRS 16 cost measurement provisions.

Right-of-use assets also have shorter useful lives and values than their respective underlying assets and, as such, cost can be used as a proxy for assets with shorter economic lives or lower values in accordance with the FReM.

### Leases

The SFO adopted IFRS 16, as interpreted and adapted in the FReM, with effect from 1 April 2022.

Where a lease has been identified, the SFO recognises a right-of-use asset and a corresponding lease liability, except for short term leases and leases for which the underlying asset is of low value. For such leases, the lease payments are recognised as an expense on a straight line basis over the lease term.

The SFO has not set a specific threshold for identifying assets that are of low value, and applies the guidance in IFRS 16 on a case by case basis.

Where the interest rate implicit in a lease cannot be readily determined, the SFO calculates the lease liability using the HM Treasury discount rates promulgated in PES papers as the incremental borrowing rate. For leases that commence or are re-measured in the 2025 calendar year, this rate is 4.72%.

### IFRS 16 Leases

IFRS 16 "Leases" introduces a single lessee accounting model, removing the distinction

between operating and finance leases and requiring a lessee to recognise 'right of use' assets and liabilities for all leases (apart from the exemptions included below). For government bodies reporting under the FReM, IFRS 16 was implemented on 1 April 2022 and replaces IAS 17 (Leases).

The SFO leasing activities relate to being a lessee in respect of buildings occupied for operational purposes.

## 1.2 Application of newly issued accounting standards not yet effective

IFRS 17 Insurance Contracts, which replaces IFRS4, was issued in May 2017 and applies to the public sector for annual reporting periods beginning on or after 1 January 2025. An assessment has been made and this standard will have no impact on SFO's financial statements.

## 1.3 Significant judgements and estimates

Provisions (note 13) - The recognition and valuation of provisions relies on the application of professional judgement, historical experience, and other factors expected to influence future events. A provision is recognised where, on the balance of probability, we expect to have to settle an existing liability as a result of past event(s) at some point after 31 March 2025, and where we can make a reasonable estimate of that future liability, but where the timing or exact amount are uncertain. The liability may be a legal obligation or a constructive obligation. A constructive obligation arises from the entity's actions, through which it has indicated to others that

it will accept certain responsibilities, and as a result has created an expectation that it will discharge those responsibilities.

Right of use assets (note 14) - As noted above, the SFO has adopted IFRS16 Leases.

Management have applied their professional judgement in determining the period of the lease on Cockspur Street as a formal lease extension is currently in negotiation with our Landlords.

2. Staff costs

	2024-25 £000			2023-24 £000
	Permanently employed staff	Others	Total	Total
Wages and salaries	27,722	6,942	34,664	31,878
Social security costs	3,232	-	3,232	2,831
Other pension costs	7,608	-	7,608	6,438
<b>Total net costs</b>	<b>38,562</b>	<b>6,942</b>	<b>45,504</b>	<b>41,147</b>

£nil of other staff costs have been capitalised and are not included in the figures above (2023-24: £nil).



### 3. Operating costs

	Note	2024-25 £000	2023-24 £000
<b>Purchase of goods and services:</b>			
Counsel costs		7,618	7,266
IT costs		3,559	3,243
General administration		9,409	6,713
Rentals under operating leases		28	32
Costs awarded against the SFO		-	11,772
Accommodation costs		2,100	2,281
Other case costs		12,826	10,034
Travel and subsistence		235	263
Consultancy		60	125
Write off of asset expense		-	3
		<b>35,835</b>	<b>41,732</b>
<b>Non-cash items:</b>			
Depreciation		953	854
Amortisation		1,023	1,058
Lease depreciation		1,818	1,789
Lease interest		221	74
Increase/(decrease) in provision		(206,794)	234,620
Loss on disposal of property, plant and equipment		-	43
External Auditors' remuneration		81	77
		<b>(202,698)</b>	<b>238,515</b>
<b>Total</b>		<b>(166,863)</b>	<b>280,247</b>



## 4. Income

	2024-25 £000	2023-24 £000
Costs awards	371	96
<b>Total income within the ambit</b>	<b>371</b>	<b>96</b>
<b>Payable to the Consolidated Fund</b> Consolidated Fund Extra Receipts	34,762	-
<b>Total income</b>	<b>35,133</b>	<b>96</b>

## 5. Property, plant and equipment

### 5.1 Property, plant and equipment 2024-25

All assets are owned.

	Improvements to Leasehold Property £000	Information Technology £000	Furniture & Fittings £000	Total £000
<b>Cost or valuation</b>				
At 1 April 2024	1,820	8,746	210	<b>10,776</b>
Additions	-	1,560	-	<b>1,560</b>
Disposals	(621)	(2,855)	-	<b>(3,476)</b>
<b>At 31 March 2025</b>	<b>1,199</b>	<b>7,451</b>	<b>210</b>	<b>8,860</b>
<b>Depreciation</b>				
At 1 April 2024	1,820	5,739	84	<b>7,643</b>
Charged in year	-	938	20	<b>958</b>
Disposals	(621)	(2,842)	-	<b>(3,463)</b>
<b>At 31 March 2025</b>	<b>1,199</b>	<b>3,835</b>	<b>104</b>	<b>5,138</b>
<b>Net book value at 31 March 2025</b>	<b>-</b>	<b>3,616</b>	<b>106</b>	<b>3,722</b>
<b>Net book value at 31 March 2024</b>	<b>-</b>	<b>3,007</b>	<b>126</b>	<b>3,133</b>

**Reconciliation of cash flows to property, plant and equipment additions**

	<b>2024-25 £000</b>	<b>2023-24 £000</b>
Total property, plant and equipment additions	1,560	1,092
<b>Cash flows for property, plant and equipment additions</b>	<b>1,560</b>	<b>1,092</b>

**5.2 Property, plant and equipment 2023-24**

	<b>Improvements to Leasehold Property £000</b>	<b>Information Technology £000</b>	<b>Furniture &amp; Fittings £000</b>	<b>Total £000</b>
<b>Cost or valuation</b>				
At 1 April 2023	1,820	9,333	202	<b>11,355</b>
Additions	-	1,084	8	<b>1,092</b>
Disposals	-	(1,671)	-	<b>(1,671)</b>
<b>At 31 March 2024</b>	<b>1,820</b>	<b>8,746</b>	<b>210</b>	<b>10,776</b>
<b>Depreciation</b>				
At 1 April 2023	1,820	6,577	63	<b>8,460</b>
Charged in year	-	833	21	<b>854</b>
Disposals	-	(1,671)	-	<b>(1,671)</b>
<b>At 31 March 2024</b>	<b>1,820</b>	<b>5,739</b>	<b>84</b>	<b>7,643</b>
<b>Net book value at 31 March 2024</b>	<b>-</b>	<b>3,007</b>	<b>126</b>	<b>3,133</b>
<b>Net book value at 31 March 2023</b>	<b>-</b>	<b>2,756</b>	<b>139</b>	<b>2,895</b>

## 6. Intangible assets

### 6.1 Intangible assets 2024-25

	Information Technology £000	Software Licenses £000	Website Costs £000	Development Expenditure £000	Total £000
<b>Cost or valuation</b>					
At 1 April 2024	3,600	5,706	169	-	<b>9,475</b>
Additions	-	664	-	-	<b>664</b>
Disposals	(3,511)	(394)	(169)	-	<b>(4,074)</b>
<b>At 31 March 2025</b>	<b>89</b>	<b>5,976</b>	<b>-</b>	<b>-</b>	<b>6,065</b>
<b>Amortisation</b>					
At 1 April 2024	3,600	4,288	169	-	<b>8,057</b>
Charged in year	-	1,023	-	-	<b>1,023</b>
Disposals	(3,511)	(394)	(169)	-	<b>(4,074)</b>
<b>At 31 March 2025</b>	<b>89</b>	<b>4,917</b>	<b>-</b>	<b>-</b>	<b>5,006</b>
<b>Net book value at 31 March 2025</b>	<b>-</b>	<b>1,059</b>	<b>-</b>	<b>-</b>	<b>1,059</b>
<b>Net book value at 31 March 2024</b>	<b>-</b>	<b>1,418</b>	<b>-</b>	<b>-</b>	<b>1,418</b>

### Reconciliation of cash flows to intangible asset additions

	2024-25 £000	2023-24 £000
Total intangible asset additions	664	804
<b>Cash flows for intangible assets additions</b>	<b>664</b>	<b>804</b>

## 6.2 Intangible assets 2023-24

	Information Technology £000	Software Licenses £000	Website Costs £000	Development Expenditure £000	Total £000
<b>Cost or valuation</b>					
At 1 April 2023	3,600	4,902	169	42	<b>8,713</b>
Additions	-	804	-	-	<b>804</b>
Disposals	-	-	-	(42)	<b>(42)</b>
<b>At 31 March 2024</b>	<b>3,600</b>	<b>5,706</b>	<b>169</b>	<b>-</b>	<b>9,475</b>
<b>Amortisation</b>					
At 1 April 2023	3,600	3,230	169	-	<b>6,999</b>
Charged in year	-	1,058	-	-	<b>1,058</b>
Disposals	-	-	-	-	<b>-</b>
<b>At 31 March 2024</b>	<b>3,600</b>	<b>4,288</b>	<b>169</b>	<b>-</b>	<b>8,057</b>
<b>Net book value at 31 March 2024</b>	<b>-</b>	<b>1,418</b>	<b>-</b>	<b>-</b>	<b>1,418</b>
<b>Net book value at 31 March 2023</b>	<b>-</b>	<b>1,673</b>	<b>-</b>	<b>42</b>	<b>1,715</b>

## 7. Capital commitments and other commitments

### 7.1 Capital commitments

Capital commitments at 31 March 2025 totalled £nil (2023-24: £nil).

## 8. Other financial commitments

The Department has not entered into any non-cancellable contracts which are not leases, PFI contracts or other service concession arrangements.

## 9. Financial instruments

As the cash requirements of the Department are met through the Estimates process, financial instruments play a more limited role in creating risk than would apply to a non-public sector body of a similar size. The majority of financial instruments relate to contracts for non-financial items in line with the expected purchase and usage requirements and the Department is therefore not exposed to significant credit, liquidity or market risk.

## 10. Cash and cash equivalents

	2024-25 £000	2023-24 £000
Balance at 1 April 2024	20,333	15,030
Net change in cash and cash equivalent balances	(8,701)	5,303
<b>Balance at 31 March 2025</b>	<b>11,632</b>	<b>20,333</b>
The following balances at 31 March were held at:		
Government Banking Service	11,632	20,333
<b>Balance at 31 March 2025</b>	<b>11,632</b>	<b>20,333</b>

## 11. Trade receivables and other current assets

### 11(a) Due within one year

	2024-25 £000	2023-24 £000
<b>Amounts falling due within one year:</b>		
VAT receivable	171	157
Deposits and advances	4	(7)
Other receivables	-	90
Prepayments and accrued income	3,826	1,443
Costs awarded to the SFO	2,100	2,138
Provision for bad and doubtful debt	(35)	(35)
Consolidated Fund extra receipts	34,518	-
	<b>40,584</b>	<b>3,786</b>

**11(b) Due after more than one year**

	2024-25 £000	2023-24 £000
<b>Amounts falling due after more than one year:</b>		
Costs awarded to the SFO	6	6
	<b>6</b>	<b>6</b>

**12. Trade payables and other current liabilities**

	2024-25 £000	2023-24 £000
<b>Amounts falling due within one year:</b>		
Taxation and social security	786	733
Trade payables	-	1,653
Accruals and deferred income	8,799	24,680
Payable to other government departments	-	-
Pension providers	789	702
Amounts issued from the Consolidated Fund for supply but not spent at year end	11,632	18,386
<b>Consolidated Fund Extra Receipts due to be paid to the Consolidated Fund:</b>		
Received	-	1,947
Receivable	36,465	-
	<b>58,471</b>	<b>48,101</b>

## 13. Provisions for liabilities and charges

	Legal costs £000	Leasehold property dilapidations £000	Total £000
Balance at 1 April 2024	237,710	450	238,160
Provided in the year	-	6	6
Provisions not required written back	(206,794)	-	(206,794)
Provisions utilised in the year	-	-	-
<b>Balance at 31 March 2025</b>	<b>30,916</b>	<b>456</b>	<b>31,372</b>
Amounts falling due within one year	30,916	456	31,372
Amounts falling due after one year	-	-	-
<b>Total</b>	<b>30,916</b>	<b>456</b>	<b>31,372</b>

### 13.1 Leasehold property dilapidations

This provision is for the estimated costs of restoring the Cockspur Street property to a state specified within the property lease when the SFO's occupation of the building ends.

### 13.2 Legal claims

A judgment was handed down in December 2023 related to a claim by the ENRC. This judgment held the SFO liable for a share of the losses incurred by ENRC in the period from August 2011 to August 2023. There will be a Phase 2 trial to determine ENRC losses as a result of the opening of the SFO's criminal investigation (the period April 2013 to August 2023) and what share the SFO and other Defendants should respectively pay. A provision of £237.7m was recognised in 2023-24. The SFO successfully challenged ENRC's right to claim for Increased Borrowing Costs of its subsidiaries leading to a substantial reduction in ENRC's claim. On 15 April 2025, ENRC was granted leave to appeal. The appeal is due to be heard on 16 or 17 July 2025.

In August 2024, ENRC quantified its Phase 2 claim against the SFO in its "Further Information" document, reducing the total claim to (1) US\$ 76.98m for unnecessary legal and other costs, (2) US\$91.30m for increased borrowing costs for ENRC and its subsidiaries, and (3) interest on (a) the sums awarded in the Phase 1A consequential hearing (March 2024) and (b) the sums claimed at Phase 2. According to ENRC, their total Phase 2 claim at this stage including interest was circa US\$290m. The SFO would only be liable for its share of the cost.

The SFO challenged ENRC's right to claim on behalf of its subsidiaries. ENRC applied for permission to amend its Particulars of Claim, which was refused in January 2025, leading to a substantial reduction in ENRC's total Phase 2 claim. The liability split as between the SFO and the other Defendants has yet to be decided for Phase 2. We have adopted for the Phase 2 liability the split that the Judge adopted in Phase 1A - the SFO being 25% liable for post-March 2013 losses.



ENRC have been granted permission to appeal Waksman J's 23 January 2025 judgment on claiming losses incurred through ENRC subsidiaries. In the event ENRC are successful in their appeal the total Phase 2 costs will include the claim on behalf of its subsidiaries and revert to US\$290 including interest, and per the above, the SFO would be liable for its share of the cost. An incremental VAT liability

(estimated at circa US\$7.7 million, plus interest) may arise if HMRC rules that ENRC cannot recover VAT on its legal fees. This is contingent on the outcome of a pending HMRC determination and cannot be estimated precisely at the reporting date. Therefore, there remains significant uncertainty over the final outflow related to this liability.

## 14. Leases

### 14.1 Disclosures around right-of-use assets

2024-25	Buildings £000	Other £000	Total £000
<b>Right-of-use assets</b>			
Right of use assets at 1 April 2022	-	359	<b>359</b>
Recognised in year	2,162	-	<b>2,162</b>
Depreciation expense	(432)	(60)	<b>(492)</b>
Balance as at 31 March 2023	1,730	299	<b>2,029</b>
Depreciation expense	(1,730)	(60)	<b>(1,790)</b>
Balance as at 31 March 2024	0	239	<b>239</b>
Recognised in year	4,395	-	<b>4,395</b>
Depreciation expense	(1,758)	(60)	<b>(1,818)</b>
<b>Balance as at 31 March 2025</b>	<b>2,637</b>	<b>179</b>	<b>2,816</b>

### 14.2 Disclosures around lease liabilities of right-of-use assets

	2024-25 £000	2023-24 £000
<b>Buildings</b>		
Not later than 1 year	(1,928)	-
Later than 1 year and not later than 5 years	(1,011)	-
<b>Less interest element</b>	179	-
<b>Present Value of obligations</b>	<b>(2,760)</b>	<b>-</b>
<b>Other:</b>		
Not later than 1 year	(81)	(78)
Later than 1 and not later than 5 years	(142)	(223)

	2024-25 £000	2023-24 £000
<b>Less interest element</b>	14	24
<b>Present Value of obligations</b>	<b>(209)</b>	<b>(277)</b>
<b>Total Present value of obligations</b>	<b>(2,969)</b>	<b>(277)</b>
<b>Current portion</b>	(1,869)	(68)
<b>Non-current portion</b>	(1,100)	(209)
<b>Balance as at 31 March 2024</b>	<b>(2,969)</b>	<b>(277)</b>

Property lease commitments relate to office space and offsite IT hosting for business continuity purposes:

- Buildings: 2-4 Cockspur Street to 31 March 2025
- Other: Spring Park, Corsham and Farnborough to 31 March 2028

#### 14.3 Quantitative disclosures around cash outflow for leases

	2024-25 £000	2023-24 £000
<b>Total cash outflow for leases</b>	<b>1,918</b>	<b>1,915</b>

## 15. Related-party transactions

The SFO has had a small number of transactions with other government departments. No Board member, key manager or other related party has undertaken any material transactions with the Department during the year.

## 16. Third party assets

The SFO manages a small number of sterling interest-bearing accounts containing seized monies. These are not SFO assets but are held as part of the SFO's law enforcement activities and, as such, do not form part of these accounts. Once legal proceedings have been completed, any seized cash is forfeited to the Home Office, confiscated by the court or, if the defendant is found not guilty, returned.

The assets held at the reporting date to which it was practical to ascribe monetary values comprised monetary assets such as bank balances and monies on deposit. The balance held at 31 March 2025 was £224,865.82 (2023-24: £30,764).

## 17. Events after the reporting period

In accordance with the requirements of IAS 10, events after the reporting period are considered up to the date on which the accounts are authorised for issue. This is interpreted as the date of the Certificate and Report of the Comptroller and Auditor General.

There have been no events after the reporting period requiring disclosure.

# Trust Statement



# Accounting Officer's Foreword

## Scope

This Trust Statement reports on receipts arising from Deferred Prosecution Agreements concluded by the SFO during the financial year. These sums are paid in total into HM Treasury's Consolidated Fund. The SFO does not obtain any receipts from these agreements.

Deferred Prosecution Agreements are a means of disposing of cases involving corporate defendants and arise from the operational activity of the Serious Fraud Office, the costs of which are accounted for in the separate financial statements contained in this Annual Report.

## Statutory background

Deferred Prosecution Agreements were introduced on 24 February 2014, under the provisions of Schedule 17 of the Crime and Courts Act 2013. A Deferred Prosecution Agreement (DPA) is an agreement reached between a prosecutor and an organisation which could be prosecuted, under the supervision of a judge. They are available to the SFO and there is a Code of Practice for Prosecutors which was published jointly by the SFO and Crown Prosecution Service on 14 February 2014 after a public consultation.

A DPA allows a prosecution to be suspended for a defined period provided the organisation meets certain specified conditions. DPAs can be used for fraud, bribery and other economic crime. They apply to organisations only, never individuals. The key features of DPAs are:

- They enable a corporate body to make full reparation for criminal behaviour without the collateral damage of a conviction (for example, sanctions or reputational damage that could put the company out of business and destroy the jobs and investments of innocent people)
- They are concluded under the supervision of a judge, who must be convinced that the DPA is 'in the interests of justice' and that the terms are 'fair, reasonable and proportionate'
- They avoid lengthy and costly trials
- They are transparent, public events

Under a DPA, a prosecutor charges a company with a criminal offence but proceedings are automatically suspended if the DPA is approved by the judge. A company would only be invited to enter DPA negotiations if there was full cooperation with an SFO investigation.

If the negotiations go ahead, the company agrees to a number of terms, including paying a financial penalty, paying compensation, paying the costs of the SFO and co-operating with future prosecutions of individuals. If the company does not honour the conditions, the prosecution may resume. Arrangements for monitoring compliance with the conditions are set out in the terms of the DPA. Once all the terms of the DPA have been met at the conclusion of the time period of the DPA, the court is notified and DPA is agreed as concluded.

## Financial background

The receipts from DPAs relating to financial penalties and compensation are not retained by the SFO and are payable to HM Treasury's Consolidated Fund. Where the terms of the DPA include payment of the SFO's investigation costs in cases funded from the Reserve, the applicable portion of those costs is also payable to the Consolidated Fund and included in this Trust Statement.

In cases which are funded from the SFO's core vote, any relevant costs awards are retained by the SFO and accounted for as income in the accompanying separate financial statements for that vote. Costs in excess of SFO limits for retained income that arise from a DPA are also included in this Trust Statement.

No material expenditure was incurred in the process of collecting and processing these receipts.

## Business review

No DPAs were entered into during 2024-25.

## Results and appropriations

The net revenue for the Consolidated Fund for the year was £nil (2023-24: £nil). Total transfers to the Consolidated Fund from the Trust amounted to £nil (2023-24: £28m), which left a balance due to the Consolidated Fund of £nil at 31 March 2025 (2023-24: £2m). Cash balances at the year-end were £nil (2023-24: £nil).



**Nick Ephgrave QPM**  
**Director**

4 July 2025





# Statement of the Accounting Officer's Responsibilities

Under Section 2(3) of the Exchequer and Audit Departments Act 1921 HM Treasury has directed the SFO to prepare, for each financial year, a Trust Statement in the form and on the basis set out in the Accounts Direction. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of the Trust Statement and of its: Statement of revenue, other income and expenditure; Statement of financial position; and Statement of cash flows cash flows for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual and in particular to:

- Observe the Accounts Direction issued by HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis
- Make judgements and estimates on a reasonable basis
- State whether applicable accounting standards, as set out in the Government Financial Reporting Manual have been followed, and disclose and explain any material departures in the Trust Statement; and
- Prepare the Trust Statement on a going concern basis

HM Treasury has appointed the Director of the SFO as Accounting Officer. The

responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding the SFO's assets, are set out in Managing Public Money published by the HM Treasury.

## Accounting Officer's confirmation

As Accounting Officer, as far as I am aware, there is no relevant audit information of which the SFO's auditors are unaware. I have taken all of the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that the National Audit Office are aware of that information.

The annual report and accounts as a whole is fair, balanced and understandable and I take personal responsibility for the annual report and accounts and the judgements required for determining that it is fair, balanced and understandable.



**Nick Ephgrave QPM**  
**Director**

4 July 2025

# Performance Report and Accountability Report

The Department's Performance Report covering both the Department and the Trust Statement is shown on page 5.

The Department's Accountability Report covering both the Department and the Trust Statement is shown on page 77.

## Governance Statement

The Department's governance statement covering both the Department and the Trust Statement is shown on page 40.





# The Certificate and Report of the Comptroller and Auditor General to the House of Commons

## Opinion on financial statements

I have audited the financial statements of the Serious Fraud Office – Trust Statement for the year ended 31 March 2025 under the Exchequer and Audit Departments Act 1921.

The financial statements comprise: the Serious Fraud Office – Trust Statement's:

- Statement of Financial Position as at 31 March 2025;
- Statement of Revenue, Other Income and Expenditure, and Statement of Cash Flows for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted international accounting standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Serious Fraud Office – Trust Statement's affairs as at 31 March 2025 and its net revenue for the year then ended; and
- have been properly prepared in accordance with the Exchequer and Audit Departments Act 1921 and HM Treasury directions issued thereunder.

## Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied

to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

## Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 *Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2024)*. My responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's *Revised Ethical Standard 2019*. I am independent of the Serious Fraud Office – Trust Statement in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

## Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Serious Fraud Office – Trust Statement's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have

not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Serious Fraud Office – Trust Statement’s ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Serious Fraud Office – Trust Statement is adopted in consideration of the requirements set out in HM Treasury’s Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

## Other information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor’s certificate and report thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

## Opinion on other matters

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with HM Treasury directions issued under the Exchequer and Audit Departments Act 1921;
- the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

## Matters on which I report by exception

In the light of the knowledge and understanding of the Serious Fraud Office – Trust Statement and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Reports.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the Serious Fraud Office – Trust Statement or returns adequate for

my audit have not been received from branches not visited by my staff; or

- I have not received all of the information and explanations I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

## Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Accounting Officer is responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- providing the C&AG with additional information and explanations needed for his audit;
- providing the C&AG with unrestricted access to persons within the Serious Fraud Office – Trust Statement from whom the auditor determines it

necessary to obtain audit evidence;

- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view and are in accordance with HM Treasury directions issued under the Exchequer and Audit Departments Act 1921;
- preparing the Annual Report in accordance with HM Treasury directions issued under the Exchequer and Audit Departments Act 1921; and
- assessing the Serious Fraud Office – Trust Statement's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Serious Fraud Office – Trust Statement will not continue to be provided in the future.

## Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Exchequer and Audit Departments Act 1921.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error

and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

**Extent to which the audit was considered capable of detecting non-compliance with laws and regulations, including fraud**

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

**Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud**

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the Serious Fraud Office – Trust Statement’s accounting policies.
- inquired of management, the Serious Fraud Office – Trust Statement’s head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Serious Fraud Office – Trust Statement’s policies and procedures on:
  - identifying, evaluating and complying with laws and regulations;
  - detecting and responding to the risks of fraud; and
  - the internal controls established to

mitigate risks related to fraud or non-compliance with laws and regulations including the Serious Fraud Office – Trust Statement’s controls relating to the Serious Fraud Office – Trust Statement’s compliance with the Exchequer and Audit Departments Act 1921 and Managing Public Money.

- inquired of management, the Serious Fraud Office – Trust Statement’s head of internal audit and those charged with governance whether:
  - they were aware of any instances of non-compliance with laws and regulations;
  - they had knowledge of any actual, suspected, or alleged fraud,
- discussed with the engagement team and the relevant regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Serious Fraud Office – Trust Statement for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions and bias in management estimates. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Serious Fraud Office – Trust Statement’s framework of authority and other legal and regulatory frameworks in which the Serious Fraud Office – Trust Statement operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements

or that had a fundamental effect on the operations of the Serious Fraud Office – Trust Statement. The key laws and regulations I considered in this context included Exchequer and Audit Departments Act 1921 and Managing Public Money.

### **Audit response to identified risk**

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Audit, Risk and Assurance Committee and in-house legal counsel concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board; and internal audit reports; and
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting

Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of my certificate.

### **Other auditor's responsibilities**

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

## **Report**

I have no observations to make on these financial statements.

**Gareth Davies**  
**Comptroller and Auditor General**

**9 July 2025**

National Audit Office  
157-197 Buckingham Palace Road  
Victoria  
London  
SW1W 9SP

# Statement of Revenue, Other Income and Expenditure

For the year ended 31 March 2025

	Note	2024-25 £000	2023-24 £000
<b>Revenue</b>			
<b>Deferred Prosecution Agreements:</b>			
Financial penalties		-	-
Interest income		-	-
Compensation		-	-
<b>Total</b>		-	-
<b>Other income</b>			
DPA costs payable to the Consolidated Fund		-	-
Compensation		-	-
(Gain)/loss on DPA		-	-
<b>Total revenue</b>		-	-
<b>Expenditure</b>			
Impairment Loss		2,070	-
<b>Total operating expenditure</b>		<b>2,070</b>	-
<b>Net expenditure for the Consolidated Fund</b>		<b>2,070</b>	-



**Nick Ephgrave QPM**  
**Accounting Officer**

4 July 2025

The notes on pages 120-122 form part of these accounts.

# Statement of Financial Position

As at 31 March 2025

	Note	2024-25 £000		2023-24 <sup>15</sup> £000	
<b>Current Assets:</b>					
Trade and other receivables	2(a)	-		2,070	
Impaired receivables	2(a)	2,070		-	
Provision for doubtful debts	2(a)	(2,070)		-	
<b>Total current assets</b>			-		2,070
<b>Total assets</b>			-		2,070
<b>Current liabilities:</b>					
Trade payables and other current liabilities		-		-	
<b>Total current liabilities</b>			-		-
<b>Assets less liabilities</b>			-		2,070
<b>Balance on Consolidated Fund</b>			-		2,070

Nick Ephgrave QPM  
Accounting Officer

4 July 2025

The notes on pages 120-122 form part of these accounts

<sup>15</sup> Please refer to note 1, Restatement of competitive Balances.



# Statement of Cash Flows

**For the year ended 31 March 2025**

	Note	2024-25 £000	2023-24 £000
Cash flows from revenue activities		-	27,950
Cash paid to Consolidated Fund		-	(27,950)
Increase/(decrease) in cash and cash equivalents		-	-

## Notes to the Statement of cash flows

Reconciliation of net cash flows to movement in net funds	Note	2024-25 £000	2023-24 £000
Net revenue for Consolidated Fund		(2,070)	-
Decrease/(Increase) in non-cash assets	2	2,070	27,950
Increase in liabilities		-	-
Adjustments to non-cash transactions		-	-
<b>Net cash flow from revenue activities</b>		<b>-</b>	<b>27,950</b>

Analysis of changes in net funds	Note	2024-25 £000	2023-24 £000
Increase/(decrease) in cash in this period		-	-
Net funds as at 1 April (opening cash at bank)		-	-
<b>Net cash as at 31 March (closing cash at bank)</b>		<b>-</b>	<b>-</b>

The notes on pages 120-122 form part of these accounts.

# Notes to the Trust Statement

## 1. Principal accounting policies

### Basis of accounting

The Trust Statement is prepared in accordance with the accounts direction issued by HM Treasury in accordance with section 2(3) of the Exchequer and Audit Departments Act 1921. The Trust Statement is prepared in accordance with the 2024-25 FReM issued by HM Treasury.

The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the SFO for the purpose of giving a true and fair view has been selected. The particular policies adopted by the SFO are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

The income and associated expenditure contained in this statement are those flows of funds which the SFO handles on behalf of the Consolidated Fund and Treasury where it is acting as an agent rather than principal.

### Accounting convention

These accounts have been prepared under the historical cost convention.

### Revenue recognition

Receipts from DPA are recognised at the point that settlement is confirmed by the Courts. DPA cost awards, where they are payable to the Consolidated Fund are also

recognised at the point that settlement is confirmed by the Courts. Due to the uncertainty of the DPA process and a lack of historic data to indicate the probability of a DPA being agreed the SFO does not classify DPAs in progress as contingent assets. For the purposes of the accounting treatment DPA's are recognised at the point that the agreement is approved.

### Interest

Interest is recognised separately to the principal as it is based on future LIBOR rates and cannot be reliably estimated due to uncertainty about those rates.

### Payables

Payables are stated at their fair value and includes interest payable as specified in the DPA agreement where applicable.

### Receivables

Receivables are stated at their fair value and includes interest payable as specified in the DPA agreement where applicable, note 2 on page 121 refers.

### Expenditure

The notional audit fee for the Trust Statement is included within operating costs note 3 of the SFO accounts. Any expenditure included in the Trust Statement is the direct cost of collection of sums owing.

### Cash and cash equivalents

Cash and cash equivalents include cash at bank and in hand, and short-term highly-liquid deposits with a maturity period of three months or less.

### Foreign exchange

The presentational currency used for the financial statements is sterling. Transactions which are denominated in a foreign currency are translated at the rate of exchange ruling on the date of the transaction, except where rates do not fluctuate significantly, in which case an average rate for the period is used.

### Restatement of competitive Balances

The Statement of Financial Position as at 31 March 2024 has been restated to correct a receivable due within one year that had been incorrectly classified as a non-current asset. The misclassification has no impact on the total assets, it only affect the split of assets between current and non-current.

## 2. Receivables

### 2(a) Due within one year

	2024-25 £000	2023-24 £000
<b>Amounts falling due within one year:</b>		
Financial penalties and disgorgement of profits	-	-
Impaired financial penalties and disgorgement of profits	2,070	-
Provision for doubtful debts	(2,070)	-
Costs awarded to the SFO	-	-
	-	<b>2,070</b>

### 2(b) Due after more than one year

	2024-25 £000	2023-24 £000
<b>Amounts falling due after one year:</b>		
Compensation	-	-
Costs awarded to the SFO	-	-
	-	-

## 3. Events after the reporting period

There were no events after the reporting period.

The financial statements were approved by the Accounting Officer for issue on the date they were certified by the Comptroller and Auditor General.

## 4. Losses and Special Payments

HM Treasury’s Managing Public Money requires a statement showing losses and special payments by value and by type to be shown where they exceed £300k in total, and those individually that exceed £300k.

### Losses

There was one loss over £300,000 (2023-24: none). This was in respect of a loss within the income section of the Trust Statement following the SFO’s application to terminate its deferred prosecution agreement (DPA) with Guralp Systems over an alleged breach of the DPA’s terms. The value of the loss is estimated at £2.1m (Note 2). If the application is successful criminal proceedings against the company will be reinstated.



# Accounts direction given by HM Treasury in accordance with Section 2 of the Exchequer and Audit Departments Act 1921

1. This direction applies to those government departments listed in appendix 2.
2. The Department shall prepare a Trust Statement ("the Statement") for the financial year ended 31 March 2025 for the revenue and other income, as directed by the Treasury, collected by the department as an agent for others, in compliance with the accounting principles and disclosure requirements of the edition of the Government Financial Reporting Manual by HM Treasury ("FReM") which is in force for 2024-25.
3. The Statement shall be prepared, as prescribed in appendix 1, so as to give a true and fair view of (a) the state of affairs relating to the collection and allocation of taxes, licence fees, fines and penalties and other income by the Department as agent and of the expenses incurred in the collection of those taxes, licence fees, fines and penalties insofar as they can properly be met from that revenue and other income; (b) the revenue and expenditure; and (c) the cash flows for the year then ended.
4. The Statement shall also be prepared so as to provide disclosure of any material expenditure or income that has not been applied to the purposes intended by Parliament or material transactions that have not conformed to the authorities which govern them.
5. When preparing the Statement, the Department shall comply with the guidance given in the FReM (Chapter 11). The Department shall also agree with HM Treasury the format of the Principal Accounting Officer's Foreword to the Statement, and the supporting notes, and the accounting policies to be adopted, particularly in relation to revenue recognition. Regard shall also be given to all relevant accounting and disclosure requirements in Managing Public Money and other guidance issued by HM Treasury, and to the principles underlying International Financial Reporting Standards.
6. Compliance with the requirements of the FReM will, in all but exceptional circumstances, be necessary for the accounts to give a true and fair view. If, in these exceptional circumstances, compliance with the requirements of the FReM is inconsistent with the requirement to give a true and fair view, the requirements of the FReM should be departed from only to the extent necessary to give a true and fair view. In such cases, informed and unbiased judgement should be used to devise an appropriate alternative treatment which should be consistent with both the economic characteristics of the circumstances concerned and the spirit of the FReM. Any material departure from the FReM should be discussed in the first instance with HM Treasury.

- 7. The Statement shall be transmitted to the Comptroller and Auditor General for the purpose of his examination and report by a date agreed with the Comptroller and Auditor General and HM Treasury to enable compliance with the administrative deadline for laying the audited accounts before Parliament.
- 8. The Trust Statement, together with this direction (but with the exception of the related appendices) and the Report produced by the Comptroller and Auditor General under section 2 of the Exchequer and Audit Departments Act 1921 shall be laid before Parliament at the same time as the Department’s Resource Accounts for the year unless the Treasury have agreed that the Trust Statement may be laid at a later date.

Kevin Pertaub  
Deputy Director,  
**Government Financial Reporting**  
HM Treasury

**19 December 2024**

**Extract from Appendix 2**

No	Sponsoring Department	Income Stream	Responsible Entity
8	Serious Fraud Office	Deferred Prosecution Agreements	SFO



# Annex A – Sustainability Report

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# Sustainability Report

## Greening Government

The SFO continues to work towards the government's 2025 sustainability goals, measuring progress against the Greening Government Commitment (GGC) targets from a 2017-18 baseline. In future years, the SFO will take into account any new 2025 – 2030 targets in support of the longer-term aim of reaching the GGC ambition of net zero by 2050.

The GGCs for 2021- 2025 were published in 2020-21. They set out the actions that UK Government departments and their partner organisations need to take to reduce their impact on the environment. Targets set for the Attorney General's Office are applied to the SFO.

The headline targets for GGC for 2021- 2025 are:

- Reduce the overall greenhouse gas emissions from the 2017-18 baseline (Attorney General's Office: 49%) and reduce direct greenhouse gas emissions from estate and operations from the 2017-18 baseline (Attorney General's Office: 25%)
- Reduce the overall amount of waste generated by 15% from the 2017-18 baseline
- Reduce water consumption by at least 8% from the 2017-18 baseline
- Continue to buy more sustainable and efficient products and services with the aim of achieving the best long-term,

overall value for money for society

- Departments and partner organisations with the greatest potential to improve biodiversity should develop and deliver nature recovery plans for their land, estates, development and operations
- Develop an organisational climate change adaptation strategy across estates and operations
- Report on the adaptation of the [Greening Government: ICT and Digital Services Strategy](#) and associated targets and ensure they provide membership to the Sustainable Technology Advice and Reporting team, who manage and deliver the Greening Government Commitments ICT reporting

## Summary

Area		2024-25 Performance		2023-24
		2024-25	2025 Target	
<b>Greenhouse Gas emissions (Scopes 1, 2 &amp; 3 business travel including air and rail travel) (tCO2e)</b>		246.5	311.1	226.4
<b>Estate Energy</b>	Consumption (kWh)	814,113.0	-	985,295.0
	Expenditure (£k)	229.8	-	358.0
<b>Estate Waste</b>	Amount (t)	41.5	33.2	50.0
	Expenditure (£k)	8.1	-	5.0
<b>Estate Water</b>	Consumption (m <sup>3</sup> )	1,413.0	3,222.8	1,418.0
	Expenditure (£k)	16.5	-	13.0

Compared to last year our total greenhouse gas emissions increased by 8.9%. This can be attributed to a rise in international travel. Overall, total greenhouse gas emissions have decreased by 59.6% since 2017-18.

Energy consumption was reduced by 17.4%. This can be predominantly attributed to the landlord's completion of a chiller replacement project, during which time the cooling assets did not function.

In October, the landlord transitioned its electricity supply from a green energy provider to one that exclusively offers 100% renewable energy.

Estate waste has reduced by 17.0%. This represents a return to normal operations following the conclusion of projects which temporarily led to an increase in waste.

Water usage for the estate has decreased by

0.4%. Overall, water usage has reduced by 59.7% since 2017-18.

The negotiation of new contract rates in October 2024 resulted in the reduction of electricity pricing by 35.8%.

# Greenhouse Gas Emissions

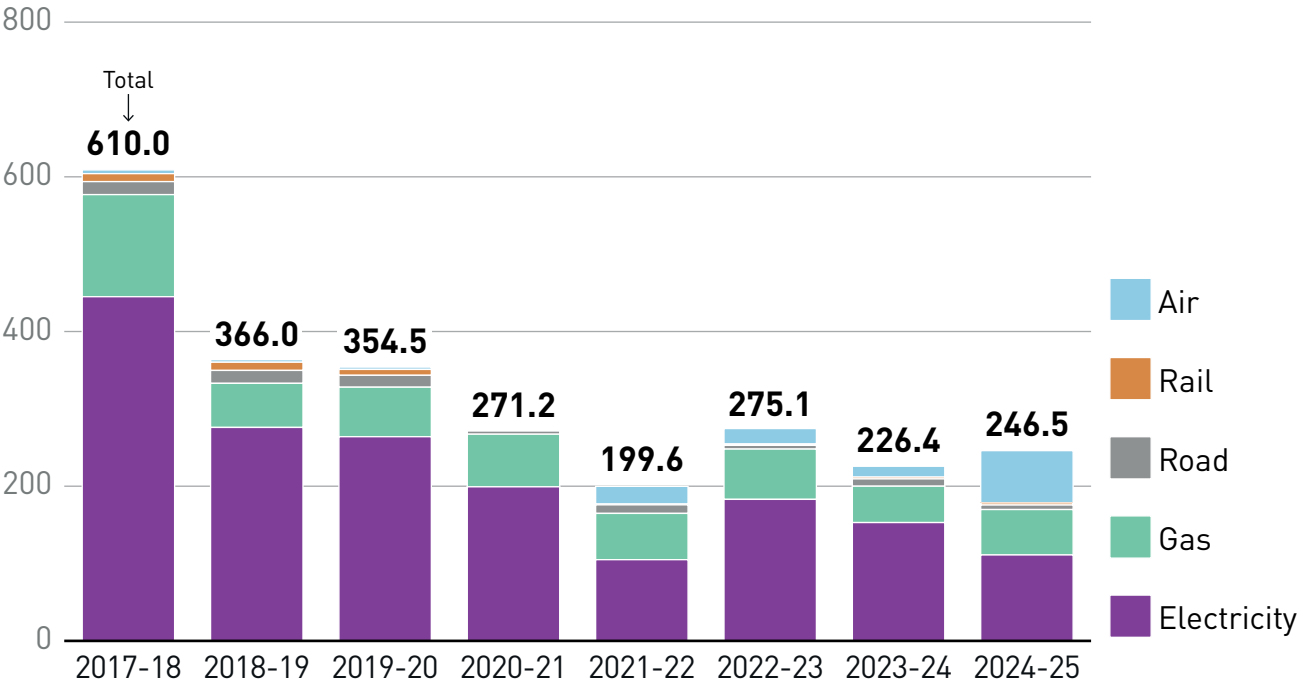
There are three different classifications of greenhouse emissions:

- Scope 1:** Direct emissions occurring from sources owned or controlled by the department. For example, emissions from combustible boilers and fleet vehicles.
- Scope 2:** Indirect emissions occurring from electricity consumed which is supplied by another party.
- Scope 3:** Other indirect emissions. All other emissions which occur because of our activity, but which are not owned or controlled by the department. For example, emissions because of staff travel on public transport, taxis, or airline flights.

Greenhouse Gas Emissions		2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Non-financial indicators (tCO2e)	Total <b>Gross</b> Emissions for Scopes 1 & 2	541.1	313.4	307.7	251.3	156.1	233.7	187.8	160.8
	Total <b>Net</b> Emission for Scopes 1 & 2	541.1	313.4	307.7	251.3	156.1	233.7	187.8	160.8
	Gross Emissions Scope 3 Business Travel	31.9	30.6	26.0	4.2	35.0	26.5	25.8	76.7
	Other Scope 3 Emissions Measured	37.0	22.0	20.8	15.7	8.5	14.9	12.8	9.0
	<b>Total</b>	<b>610.0</b>	<b>366.0</b>	<b>354.5</b>	<b>271.2</b>	<b>199.6</b>	<b>275.1</b>	<b>226.4</b>	<b>246.5</b>

Greenhouse Gas Emissions		2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Related Energy Consumption (kWh, 000s)	Electricity: Non Renewable	990.0	900.0	860.2	648.0	453.3	793.2	725.8	493.1
	Electricity: Renewable	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Gas	717.1	312.0	349.2	367.0	326.7	355.8	259.5	321.0
	<b>Total</b>	<b>1,707.1</b>	<b>1,212.0</b>	<b>1,209.4</b>	<b>1,015.0</b>	<b>780.0</b>	<b>1,149.0</b>	<b>985.3</b>	<b>814.1</b>
Financial Indicators (£k)	Expenditure on Energy	135.0	134.0	174.0	143.0	72.0	162.0	358.0	229.8
	CRC Licence Expenditure	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Expenditure on Accredited Offsets	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Expenditure on Official Business Travel	125.0	106.0	104.0	37.9	76.0	174.0	263.0	109.3
	<b>Total</b>	<b>260.0</b>	<b>240.0</b>	<b>278.0</b>	<b>180.9</b>	<b>148.0</b>	<b>336.0</b>	<b>621.0</b>	<b>339.1</b>

Emission source (tCO2e)



Emission sources (tCO2e)	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Electricity	445.0	278.0	264.3	199.0	104.8	183.3	153.2	111.1
Gas	133.1	57.4	64.2	68.0	59.8	65.2	47.4	58.7
Road	16.8	16.7	15.4	4.1	11.0	4.8	9.5	5.8
Rail	10.3	10.6	7.6	0.1	1.1	1.8	2.3	2.8
Air	4.8	3.3	3.0	0.0	22.9	20.0	14.0	68.1
Total	610.0	366.0	354.5	271.2	199.6	275.1	226.4	246.5

## Scope 1 – Direct emissions

The 2025 direct emissions target for the Attorney General's Office is an overall reduction of 25% against the 2017-18 baseline figure. In 2017-18 the SFO consumed 717,110kwh of energy via gas, which is within the scope 1 emissions. In 2024-25 the SFO consumed 321,013kwh, which is a reduction of 55.2% against the baseline.

## Overall greenhouse gas emissions

The 2025 overall emissions target for the Attorney General's Office is a reduction of 49% on the 2017-18 baseline figure. In 2017-18 the SFO generated 610 tCO<sub>2</sub>e, meaning that the 2025 target is a reduction to 311 tCO<sub>2</sub>e. In 2024-25 the SFO's greenhouse gas emissions were 246.5tCO<sub>2</sub>e, which is 64.5tCO<sub>2</sub>e below the 2025 target and a reduction of 59.6% against the baseline.

## Flights<sup>16</sup>

In 2024-25 there were 45 domestic flights covering a total of 22,935km.

In 2024-25 there were 78 international flights. This travel is demand-led and depends on operational requirements. The SFO's climate change adaptation strategy will be used to promote and aim to reduce the number of international and domestic flights where possible.

The table below show the details for international air travel for each category and class.

Flight Category	Short-haul		Long-haul	
	Flights	Distance (km)	Flights	Distance (km)
Business	4	15,913	10	116,095
Premium Economy	4	3,566	12	67,109
Economy	40	23,873	8	53,174
<b>Total</b>	<b>48</b>	<b>43,352</b>	<b>30</b>	<b>236,378</b>

<sup>16</sup> Due to an update in methodology, figures relating to the number of flights taken are not directly comparable with those set out in the 2023-24 Annual Report and Accounts.

## Hire cars

The SFO does not own any vehicles. All vehicles are hired from a supplier via a Crown Commercial Services framework contract. 77 vehicles were hired in 2024-25, of which 5% were electric vehicles. Overall, the number of vehicle hires has reduced by 43.4% compared to last year. The SFO have increased the number of electric vehicles it has hired during the reporting period and will continue to encourage this through its travel policies and practices the booking of electric and hybrid vehicles. The SFO is collaborating with its supplier to ensure that it is supplied with electric/hybrid vehicles where possible.

## Paper usage

In 2024-25 the SFO ordered 938 reams of A4 paper and 90 reams of A3, which is the equivalent to a total of 1,118 reams of A4. In 2017-18 the SFO ordered the equivalent of 4,414 reams of A4 paper. This represents a 74.7% reduction, which is attributable to the increasing use of digital data. This use is demand-led and dependent on operational and court requirements.

## Waste minimisation and management

The 2025 waste target for the Attorney General's Office is a reduction of 15% on the 2017-18 baseline figure. In 2017-18, the SFO generated 39 tonnes of waste, meaning that the 2025 target is a reduction to 33.15 tonnes. In 2024-25 the SFO generated 41.5 tonnes of waste. Opportunities to maximise waste reduction were limited by a project to reduce the number operational case files held offsite by transitioning to digital storage.

The SFO operates in a flexible working environment where waste is collected at focal points on each floor, encouraging recycling and an overall reduction in the volume of waste. The organisation recycles 100% of its wastepaper and uses 100% recycled paper for our floor printers. It follows the requirements of the Waste Electrical and Electronic Equipment Directive when disposing of IT equipment.

The SFO continues to collaborate with our landlord on initiatives to reduce and manage its waste further.

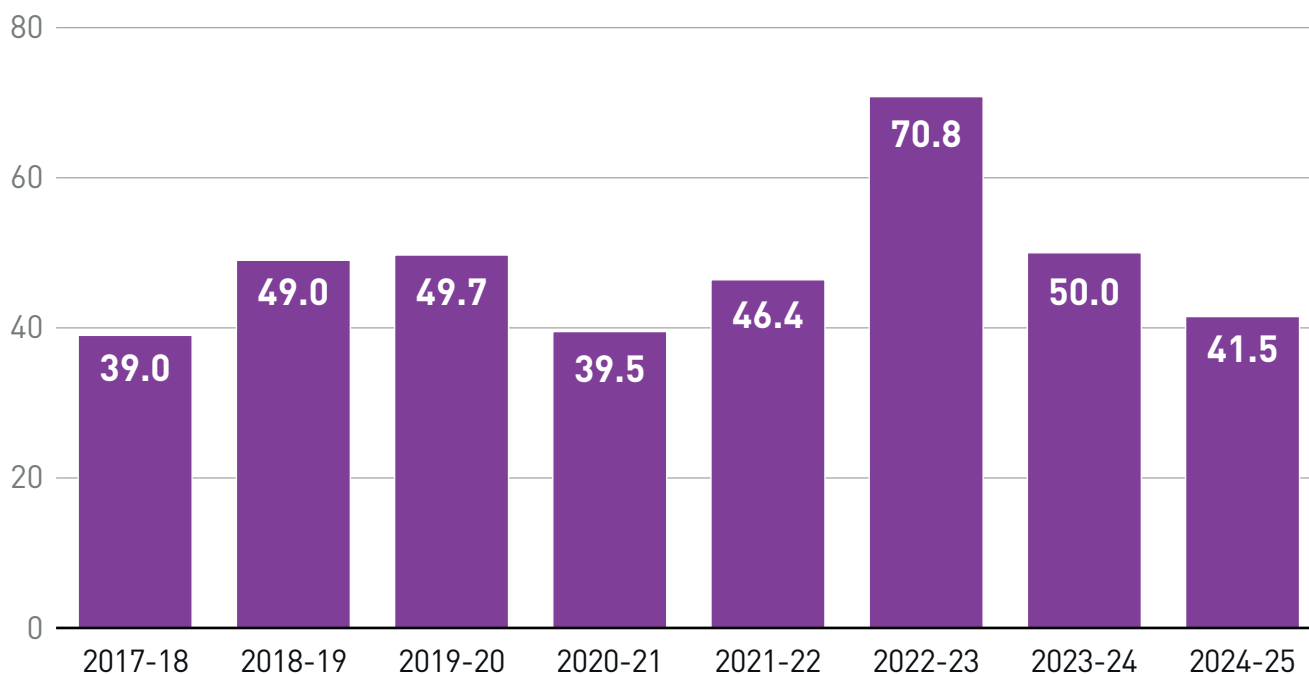
Westminster Council waste collection continues to use mixed recycling (processed depending on materials) and landfill materials are incinerated to produce electricity for 50,000 homes and businesses and the TFL tube system. Residual ash is used in road building and repair.

In 2024-25 the SFO used a total of 345 CSUP (consumer single use plastics) items compared to 363 in 2023-24. These items were all stationery items i.e. pens, highlighters, plastic wallets, and dividers. The organisation reduces use of CSUP items where possible but the volumes are dependent on operational needs. The SFO does not provide food and refreshments on its estate.



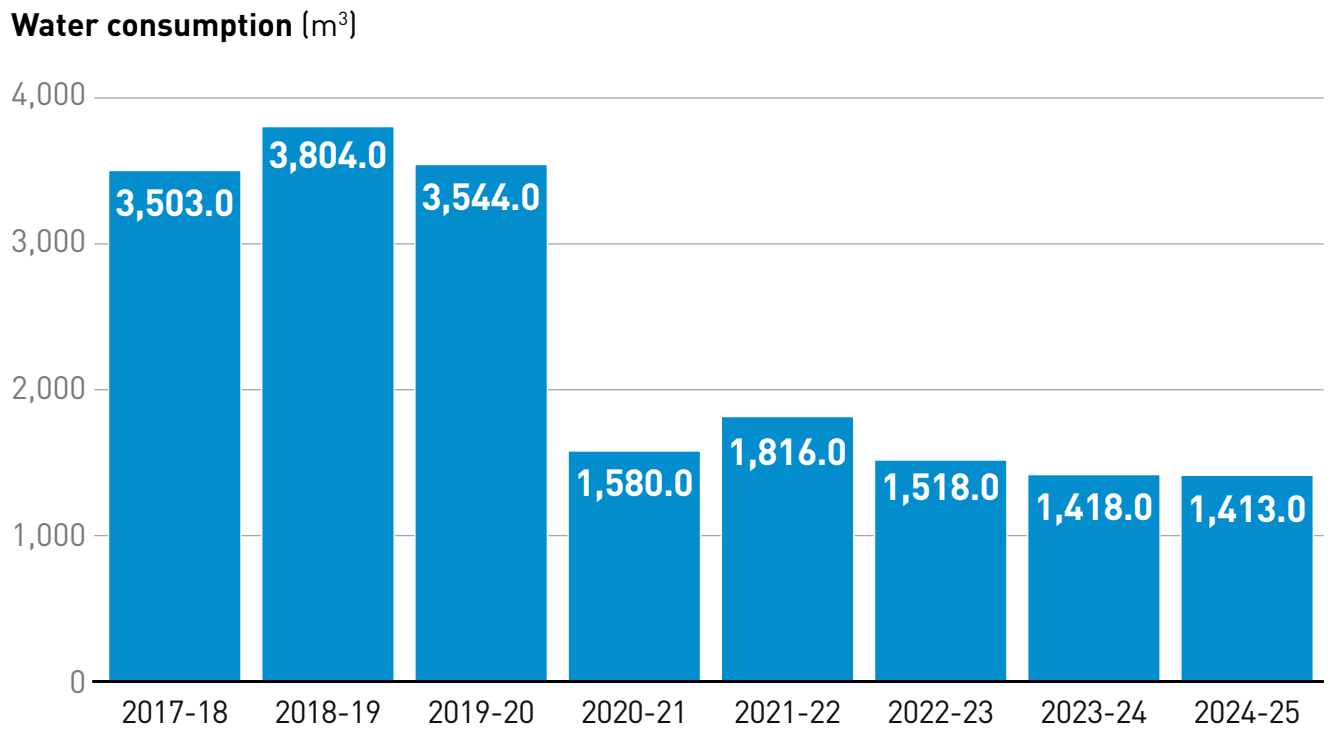
# Waste Volumes

## Non-hazardous waste (tonnes)



		2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Weight (t)	Non Hazardous Waste								
	Landfill	0.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0
	Reused/ Recycled	22.0	30.0	31.8	22.6	24.8	37.5	36.7	27.6
	Incinerated/ Energy from waste	17.0	17.0	17.9	16.9	21.6	33.3	13.3	13.9
	<b>Total</b>	<b>39.0</b>	<b>49.0</b>	<b>49.7</b>	<b>39.5</b>	<b>46.4</b>	<b>70.8</b>	<b>50.0</b>	<b>41.5</b>
Cost (£k)	Non Hazardous Waste								
	Landfill	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0
	Reused/ Recycled	3.0	3.0	3.0	0.7	14.7	7.0	5.0	5.0
	Incinerated/ Energy from waste	5.0	6.0	5.0	5.0	3.0	7.0	5.0	3.1
	<b>Total</b>	<b>8.0</b>	<b>9.5</b>	<b>8.0</b>	<b>5.7</b>	<b>17.7</b>	<b>14.0</b>	<b>10.0</b>	<b>8.1</b>

# Finite resource (Water) consumption



Finite Resource Consumption		2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Non-financial indicators (m³)	Water Consumption	3,503.0	3,804.0	3,544.0	1,580.0	1,816.0	1,518.0	1,418.0	1,413.0
Financial Indicators (£k)	Water Supply Costs	4.5	11.0	11.0	0.1	10.0	10.0	13.0	16.5

The SFO’s 2025 target for water usage is to achieve an overall reduction of 8% on the baseline figure of 3,503m³. Overall, total water consumption has decreased by 59.7% since 2017-18.

The SFO occupies a shared building and does not have overall control of water consumption throughout the estate. The landlord’s managing agent holds responsibility for water consumed on the estate and the agency pays a percentage through the service charge.

## Sustainable procurement

Where possible, the SFO makes use of centralised government framework contracts which embed Government Buying Standards (GBS) within them. If no centralised contracts are

available then contracts will meet the GBS requirements where appropriate.

## Climate change adaptation strategy

The SFO continues to work with the Government Property Agency to find suitable office space on the government estate and will work with future tenants, landlords or relevant authorities to develop and implement a climate change adaptation strategy.

## Governance

The Solicitor General represents the Law Officers' Departments on Sustainable Development matters. Targets set for the Attorney General's Office are applied to the SFO.

Results against the GGC targets are reported annually.

## Notes:

1. Electricity figures only relate to SFO consumption and do not include electricity consumption for common parts of the building.





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