

Reference: 2025-093

Thank you for your email in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

Investigative Systems

1. Do you have dedicated systems, databases, or platforms in place for fraud and financial crime investigations?
If so, please specify what systems are currently used (e.g. Companies House, credit reference agencies, internal databases, third-party platforms).

Data Sources & Access

2. Do you have a consolidated platform that brings together company, director, and financial intelligence from multiple verified UK sources?
Or do investigative staff currently access this information manually across multiple, disconnected systems?

Evidence Standards

3. Do you have processes in place to ensure that intelligence gathered for fraud investigations is disclosure-ready (i.e. date-stamped, unaltered, and admissible in court)?
If not, how is continuity of evidence assured?

Director & Network Mapping

4. Do you have tools to map cross-company directorships, disqualified directors, and hidden associations across multiple firms?
If not, how is this analysis currently carried out?

Monitoring & Alerts

5. Do you have live monitoring or watchlist capabilities to track suspect companies, directors, or entities in real time?
Or is monitoring carried out through periodic manual checks?

Financial Risk Profiling

6. Do you have the ability to automatically profile the financial resilience of companies (e.g. through balance sheets, P&L, cashflow, CCJs, or charges)?
If not, how is financial risk typically assessed during investigations?

Casework Efficiency

7. Do you have audit trails and secure collaboration tools in place for investigative teams working across cases?
Or are cases typically reliant on manual collation and file sharing?

Security & Compliance

8. Do you have systems accredited to ISO 27001 or equivalent for handling sensitive investigative data?
If not, what measures are currently in place to ensure security and GDPR compliance?

Fraud on the Corporate Risk Register

9. Do you have fraud, financial crime, or corruption risks recorded on your corporate risk register?
If so, please provide:
 - a) The specific risks listed (e.g. procurement fraud, payroll fraud, supplier collusion, grant misappropriation, etc.).

- b) The current risk ratings (likelihood, impact, or equivalent scoring used).
- c) Details of any mitigating controls identified.
- d) If fraud is not explicitly recorded on the corporate risk register, please confirm how the organisation records and monitors fraud-related risks.

Response

Please see our response to your questions in the order asked.

Questions 1, 2, 4, 5 and 9

You can find answers to some of the questions about 'Corporate Risk' in our Annual Report and Accounts 2024-25, which is available on our website at: SFO Annual Report and Accounts 2024-25 - GOV.UK

For the remaining questions, we do hold some of the information you have requested. However, this is exempt from release under section 31(1) of the FOIA.

Section 31(1)(a), (b), and (c) provides that:

Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice—

- (a) the prevention or detection of crime,*
- (b) the apprehension or prosecution of offenders,*
- (c) the administration of justice:*

How the exemption is engaged

As a law enforcement agency, the Serious Fraud Office (SFO) holds highly sensitive information which is of interest to others, including those we investigate. The disclosure of detailed information regarding our investigative systems, data sources, network mapping, and risk register could undermine our investigative functions and compromise our ability to maintain operational capacity, thereby prejudicing the interests at (a), (b) and (c) above.

Public interest test

Sections 31(a), (b), and (c) are qualified exemptions and require consideration of whether, in all the circumstances of the case, the public interest in exempting this data outweighs the public interest in disclosing it. More information about exemptions in general and the public interest test is available on the ICO's website at www.ico.org.uk.

It is recognised that there is a general public interest in publicising information about the SFO, so that the public knows that serious fraud, bribery, and corruption are being investigated and prosecuted effectively, and so that the public can be reassured about the general conduct of our organisation and how public money is spent.

However, having considered the public interest in releasing this information, we consider that the stronger interest lies in maintaining these exemptions of the FOIA. Primarily, the risk that this information could pose to the SFO's investigative functions against which it is essential to safeguard given the highly sensitive nature of the information held as a law enforcement agency. Releasing sensitive details about our investigative and operational functions risk compromising the SFO's ability to provide and maintain data security for the cases at pre-investigation, investigation, prosecution stages and beyond.

Having considered the opposing arguments, I believe that the stronger public interest lies in exempting the information from release.

Question 3

We have understood your question to be whether the SFO has processes in place to make sure that the evidence it obtained during the course of its investigations can be admitted in court. The SFO has a robust registration and control process which governs how material must be handled from the time it is obtained through to when it is either returned to the owner or destroyed in line with the SFO's Review, Retention and Disposal Policy. Adherence to this process ensures the integrity and continuity of the material.

Question 6

We do not have an automatic system. Financial risk is handled through the manual assessment by financial specialists.

Question 7

The SFO cases are reliant on manual collation and file sharing. We have appropriate measures in place when a system is used for collaboration across cases.

Question 8

The SFO does not hold this certification, however there are a number of measures in place which assure the SFO's position in respect of security and data protection.