

Reference: 2025-100

Thank you for your email dated 4 September 2025 in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

I am writing to request information under the Freedom of Information Act Collar Crime under Serious Fraud, Bribery and Corruption My request specifically concerns the following:

- 1. What investigative measures do you take when you suspect that there is an individuals or group, solely or joint authority, business organisation or corporation involved in collar crimes? Please provide details on the operational actions being implemented or advised for addressing this issue?**
- 2. What investigative measures are planned? Kindly share as a diagram if available online. If any further investigative steps are anticipated, please outline the proposed procedures.**
- 3. Are there any operational actions being implemented or advised for addressing this issue? This includes any policy changes, procedural adjustments, or preventative measures taken or proposed to mitigate the risk of similar future incidents.**
- 4. Are any external agencies involved in the investigation?**

Response

Questions 1, 2 & 3

Some limited information in relation to our ways of working is available via our website: SFO Statement of Principle - GOV.UK. Beyond this, we confirm we hold relevant information, however, it 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. Releasing detailed information about our techniques and processes could therefore undermine our investigative functions, compromise our ability to protect SFO investigative material, and provide insight which could provide excessive information into the public domain which would be accessible to criminals. This thereby prejudices 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. The SFO therefore releases information

about specific cases and our methods where applicable and where it has been judged that this will not impact our core functions. The SFO is held to account publicly through its external communications (including press releases and attendance at public events), its Annual Report and Accounts, which are laid in Parliament, and through appearances in front of Select Committees. Additionally, the SFO is held to account by the Attorney General and Solicitor General; the agreement that dictates this is in the public domain.¹

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 information about the cases we investigate 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 4

We have understood this question to refer to the specific investigation which is referenced in your emails to our Public Enquiries team. We can confirm that no information is held.

¹ www.gov.uk/government/publications/framework-agreement-between-the-law-officers-and-the-director-of-the-serious-fraud-office