

Reference: 2026-007

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

Please disclose the following information, for the financial years 2019/20, 2020/21, 2021/22, 2022/23, 2023/24, and 2024/25:

- 1. How many investigations into individuals and firms (total) did the SFO terminate?**
- 2. What was the total spend (in GBP) on investigations into individuals and firms terminated by the SFO?**

Please note that the above refers to all kinds of investigations.

Response

Please see below our response to your questions.

Questions 1

We can confirm that the SFO terminated over 30 investigations during the period covered by your request. We hold information regarding the precise number of investigations terminated. However, we consider this more detailed information to be exempt from disclosure 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 SFO holds highly sensitive information which is of interest to others, including those we investigate. Disclosing the precise year-by-year breakdown would allow individuals to identify specific terminated investigations or to draw inferences about the SFO's operational priorities and resource allocation, including the types of cases we are likely to pursue to conclusion. Such intelligence could assist potential offenders in structuring their activities to reduce the likelihood of successful investigation and prosecution, 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 operational work against which it is essential to safeguard given the highly sensitive nature of the information held as a law enforcement agency. Releasing sensitive information regarding our investigations 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.

Questions 2

While the SFO holds the information you have requested, due to the scope of the question we are unable to provide the requested information as it is exempt under section 12 of the FOIA.

How the exemption is engaged

Under section 12 of the FOIA, a public authority does not have to comply with a request for information if complying with the request would exceed the appropriate cost limit, which has been set at £600. A flat rate of £25 per person, per hour, is given for determining whether information is held, finding and retrieving records and extracting the requested information. This means the appropriate limit of £600 will be exceeded if more than 24 hours are required to complete the work, which would be the case in this instance.

The information you have requested is not held in a single central location. To compile the total spend on all terminated investigations across six financial years, we would need to run reports on all costs posted to our systems and then calculate the hours posted to each relevant project. This work would require at least two members of staff and would take approximately one week (37 hours) to complete and review. As this significantly exceeds the 24-hour limit, we are not obliged to comply with your request.

Section 12 is an absolute exemption and therefore does not require a public interest test.

We recognise that under section 16 of the FOIA, we have a duty to provide reasonable advice and assistance. Therefore, you may wish to consider submitting a refined request with a narrower scope, which may enable us to respond within the cost limit.